

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR
AT CAMP COURT SWAT

Service Appeal No. 556/2019

Date of Institution ... 30.04.2019

Date of Decision ... 04.04.2022

Hazrat Ali S/O Mian Said Wahid Class-IV/Chowkidar at Divisional Forest Office Swat.

... (Appellant)

VERSUS

Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar Secretariat and four others.

... (Respondents)

MR. UMAR KHITAB,
Advocate

--- For appellant.

MR. NOOR ZAMAN KHATTAK,
District Attorney

--- For respondents.

MR. SALAH-UD-DIN
MS. ROZINA REHMAN

--- MEMBER (JUDICIAL)
--- MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Precisely stated the facts as alleged by the appellant in his appeal are that, his father was serving in Forest Department Swat, who died during service on 26.05.2021; that the appellant submitted an application for his appointment as Junior Clerk on deceased's son quota, however he was appointed as Chowkidar with verbal assurance by Chief Conservative Forest Malakand Forest Region-III Saidu Sharif Swat that he shall be appointed as Junior Clerk in the near future; that later on the appellant made several verbal requests to the respondents to appoint him as Junior Clerk but in vain, therefore, the appellant



submitted an application to the respondents for his appointment on the post of Junior Clerk, however the same was not responded; that the appellant then filed departmental appeal on 25.01.2019, which was also not decided within the statutory period, hence the instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions made by the appellant in his appeal.

3. Learned counsel for the appellant has argued that the appellant has passed Secondary School Certificate Examination and was qualified to have been appointed as Junior Clerk but the respondents appointed the appellant as Chowkidar despite availability of vacant post of Junior Clerk; that the appellant was entitled to have been appointed as Junior Clerk on deceased's son quota but he was wrongly and illegally ignored by the respondents, therefore, legal as well as constitutional rights of the appellant were violated; that after appointment of the appellant as Chowkidar, the respondents had assured the appellant that he will be appointed as Junior Clerk in near future, however they did not fulfill their commitment. In the last, he requested that the respondents may be directed to appoint the appellant on the post of Junior Clerk on deceased's son quota being eligible and qualified for the same.

4. On the other hand, learned District Attorney for the respondents has contended that the appellant had himself submitted an application for his appointment as Class-IV employee on deceased son quota, therefore, the competent Authority appointed him as Chowkidar; that the appellant had himself mentioned in his application for appointment as Class-IV employee that no post of Junior Clerk was available to be filled through an candidate on deceased's son quota; that existing rules did not allow re-appointment of Class-IV as Junior Clerk against deceased son quota, therefore, the request of the appellant could not be legally accepted; that the departmental appeal of the appellant was badly time barred,

therefore, his service appeal is liable to be dismissed being not maintainable.

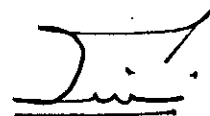
5. We have heard the arguments of learned counsel for the appellant as well as learned District Attorney for the respondents and have perused the record.

6. A perusal of the record would show that the appellant had initially submitted an application to be appointed as Junior Clerk on deceased's son quota, however later on he himself submitted an application to the competent Authority to appoint him on any Class-IV post due to non-availability of post of Junior Clerk. The appellant was thus appointed as Chowkidar upon his own written request. The appellant has though alleged that at the relevant time, post of Junior Clerk was available for filling through deceased's son quota, however he has been unable to support his contentions through any documentary proof. The correspondence between the office of Conservator of Forests, Malakand Forest Circle East, Saidu Sharif Swat and office of Divisional Forest Officer Swat Forest Division, Mingora regarding the appointment of the appellant as Junior Clerk would show that there was no vacancy of Junior Clerk at the relevant time.

07. In view of the above discussion, the appeal in hand being devoid of any merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

04.04.2022



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT SWAT



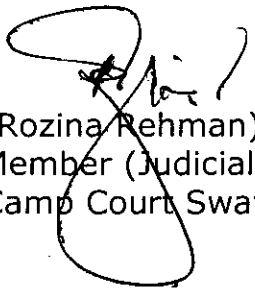
(ROZINA REHMAN)
MEMBER (JUDICIAL)
CAMP COURT SWAT

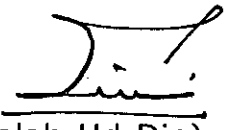
ORDER
04.04.2022

Learned counsel for the appellant present. Mr. Abdul Ghafoor, Forest Guard alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand being devoid of any merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
04.04.2022


(Rozina Rehman)
Member (Judicial)
Camp Court Swat

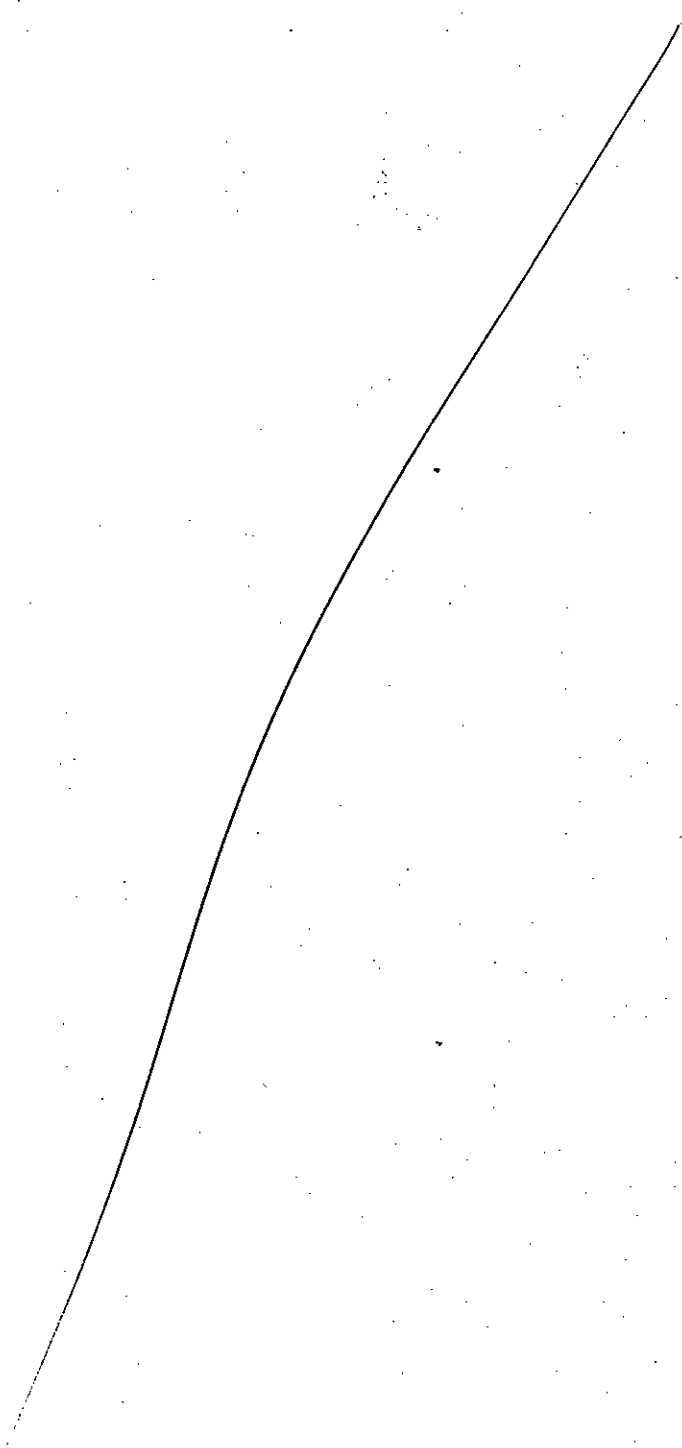

(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

07.02.2022

Tour is hereby canceled .Therefore, the case is adjourned
to 04.04.2022 for the same as before at Camp Court Swat.



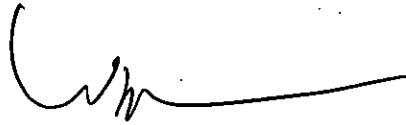
Reader



07.10.2021

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Abdul Ghafoor Forest Guard for respondents present

Learned Members of the DBA are observing Sogh over the demise of Qazi Imdadullah Advocate and in this regard request for adjournment was made; allowed. To come up for arguments before the D.B on 06.12.2021 at Camp Court, Swat.



(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat

06.12.2021

Appellant present through counsel.

Muhammad Rasheed learned Deputy District Attorney alongwith Abdul Ghafoor S.I (Legal) for respondents present.

Former made a request for adjournment in order to prepare the brief. Opportunity is granted. To come up for arguments 07.02.2022 before D.B at Camp Court, Swat.




(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

6.01.2021

Due to COVID 19, the case is adjourned to
3.03.2021 for the same as before.

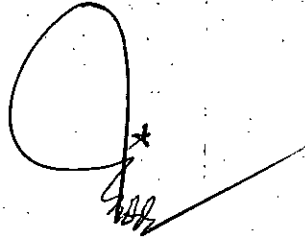

Reader

03.03.2021

Nemo for parties.

Riaz Khan Paindakheil learned Assistant Advocate General
present.

Preceding date was adjourned on a Reader's note,
therefore, both the parties be put on notice for
7/6/2021 for arguments, before D.B at Camp Court,
Swat.



(Mian Muhammad)
Member (E)
Camp Court, Swat



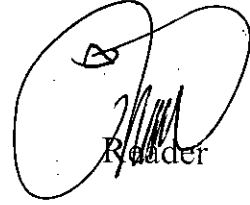
(Rozina Rehman)
Member (J)
Camp Court, Swat

*Due to COVID-19 the case
is adjourned to 7/10/21*

*On
Reader*

03.06.2020

Due to Covid-19, the case is adjourned. To come up for the same on 06.08.2020, at camp court Swat.



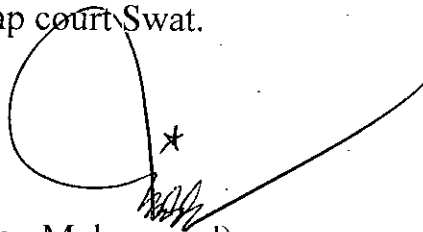
Reader

06.10.2020

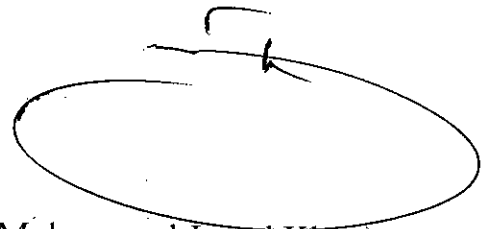
Appellant is present in person. Mr. Usman Ghani, District Attorney for respondents present.

Arguments could not be heard due to strike of the District Bar Association, Swat.

Adjourned to 04.11.2020 for arguments before D.B at camp court Swat.



(Mian Muhammad)
Member(E)



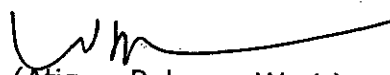
(Muhammad Jamal Khan)
Member
Camp Court Swat

04.11.2020

Appellant in person present.

Learned Assistant Advocate General for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 06.01.2021 for arguments, before D.B at Camp Court Swat.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat

04.02.2020

Appellant in person present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Mr. Abdul Ghafoor Forest Guard for the respondents present. Lawyers are not attending the courts today on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for further proceedings/arguments on 04.03.2020 before D.B at Camp Court Swat.

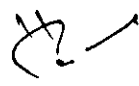

Member


Member
at Camp Court Swat

04.03.2020

Appellant with counsel present. Mr. Usman Ghani learned District Attorney alongwith Mr. Abdul Ghafoor Forest Guard for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 08.04.2020 before D.B.


Member



Member
Camp Court Swat

Due to corona virus tour
to camp Court swat has been
Cancelled. To come up for the same
on 03/06/20


Reader


07.10.2019

Appellant in person and Mr. Anwar-ul-Haq, Deputy District Attorney alongwith Mr. Rooh-ul-Amin, Forester for the respondents present. Written reply on behalf of respondents not submitted. Representative of the respondents requested for adjournment. Adjourned to 04.11.2019 for written reply/comments before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

04.11.2019

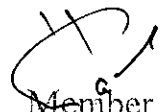
Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Ghafoor, Forest Guard for the respondents present. Written reply on behalf of respondents not submitted. Representative of the respondents requested for further adjournment. Adjourned to 03.12.2019 for written reply/comments before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

03.12.2019

Appellant in person present. Mr. Riaz Paindakheil learned Assistant Advocate General alongwith representative Najeeb Ullah SDFO present. Representative of the respondent department submitted written reply/comments. To come up rejoinder if any and arguments on 04.02.2020 before D.B at Camp Court, Swat.


Member


Member
Camp Court, Swat

03.07.2019

Learned counsel for the appellant present and submitted application for correction of clerical mistake of mentioning Education Department instead of Forest Department in the prayer/heading of the memo of service appeal. Application allowed. Moharrir is directed for necessary correction in the prayer/heading of memo of service appeal. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant was appointed as Chowkidar/Class-IV against the deceased son quota; that now the appellant wants to be appointed as Junior Clerk against the deceased son quota by resigning from the post of Chowkidar/Class-IV. Learned counsel for the appellant stressed that the appellant is legally entitled for appointment as Junior Clerk against the deceased son quota by resigning from the post of Chowkidar/Class-IV against which he was appointed on deceased son quota.

Submission made by the learned counsel for the appellant, needs consideration. The present service appeal is admitted for regular hearing subject to all the legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 07.10.2019 before S.B at Camp Court, Swat.

Appellant Deposited
Process Fee

5/7/19






Member
Camp Court, Swat.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. _____ 556/2019 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/04/2019	<p>The appeal of Mr. Hazrat Ali presented today by Mr. Umar Khitab Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p style="text-align: right;"> REGISTRAR 30/4/19</p>
2-	10-5-19	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>12-06-19</u></p> <p style="text-align: right;"> CHAIRMAN</p>
12.06.2019		<p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 03.07.2019 before S.B at Camp Court, Swat.</p> <p style="text-align: right;"> Member Camp Court, Swat.</p>

BEFORE THE SERVICE TRIBUNAL KHYBER
PUKHTOON KHWA PESHAWAR

Service Appeal No. 556 of 2019

Hazrat Ali Son of Mian Said Wahid Class IV/ Chawkidar Forest Department
Swat.

VERSUS

Secretary Forest Government of Kpk at Peshawar Secretariat & Others

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4	Copy of application & appointment order	B&B1	9-9A
5	Copies of applications	C&D	10-11
6	Copy of departmental appeal	E	12
7	Copy of applications right to information Act	F&G	13-14
8	Wakalat Nama	...	15

Appellant through

UMAR KHITAB
Advocate

District Courts Gulkada Swat.
Cell#0345-9524854

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service appeal No. 556 of 2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 678

Dated 30/4/2019

Hazrat Ali S/o Mian Said Wahid Class-IV / Chowkidar at Divisional
Forest Office Swat.....Appellant

VERSUS

- (1) Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar Secretariat.
- (2) Chief Conservator of Forest Region I Khyber Pakhtunkhwa.
- (3) Chief Conservator forest Malakand Forest Region III Saidu Sharif Swat.
- (4) Divisional Forest Officer at Gulkada Swat.
- (5) District Forest Officer Demarcation Swat.

.....Respondents

Appeal under Section 4 of Service Tribunal Act, 1974, for the appointment of the petitioner as junior clerk on deceased son's quota in education department.

Filed to-day

Registrar

30/4/19

Prayer:-

On acceptance of the instant service appeal, the petitioner may kindly be appointed on the post of junior clerk in forest department on deceased son's quota being eligible and qualified.

Respectfully Sheweth:

Brief facts of the case give rise for filing the instant service appeal are as under.

1. That the father of the appellant was performing his duty in forest department Swat and died during the service on 26-05-2011. (Copy of death certificate is attached as Annexure "A")

2. That the appellant on deceased son's quota submitted an application for his appointment as a Junior Clerk before the respondent No. 3 against the vacant post, but the appellant was appointed as Chawkidar / class IV through office order No. 131 dated 01-03-2017 and the respondent No. 3 verbally promised that the appellant shall be appointed as a Junior clerk in near future. (Copy of application is attached as Annexure "B") appointment order Annexure B1

3. That the appellant time and again orally requested the respondents to appoint the appellant on the post of Junior clerk as promised, but the respondent refused to do so, then the appellant filed an application before the respondent No. 3 to 5 for the appointment of the appellant on the post of Junior clerk but the respondent No. 3 to 5 keep the application of the appellant without any decision whatsoever. (Copies of applications are attached as Annexure "C" & "D")

4. That the appellant disappointed by the respondents No, 3 to 5 filed a departmental appeal on 25/01/2019 before the respondent No 2 but the respondent No 2 also not decided the departmental appeal of the appellant with the prescribed period of time illegally with out lawful authority. (Copy of the departmental appeal is attached as Annexure : E:

5. The appellant submitted applications through Registered AD to Respondents No, 3 & 5 vide post office Receipts No, RGL 12798346 & RGL 12798345 Dated 10/04/2019 to allow the copy of impugned order/ Rejection order , but the same were refused.(Applications Annexure "F & G ")

6. That the aggrieved from the inactions of the respondents the appellant has no other efficacious remedy but to file the instant service appeal before this Honorable Tribunal on the following amongst other grounds.

GROUND.

1. That the appellant is not treated an accordance with law by respondents and are trying to deprive the appellant of his legal constitution rights.

2. That the petitioner is well qualified and eligible for the post of junior clerk and he also submitted an application for his appointment as junior clerk, but the respondents inadvertently appointed the appellant as chawkidar /class IV with the malafide intention just to deprive the appellant from his due right illegally and without any cogent reason.


3. That at the time of appointment of the appellant the vacant post of junior clerk was lying vacant and also available now but the respondents illegally refusing to appoint the appellant

as a Junior clerk just for appointing on the same their blue eyed.

4. That the petitioner is entitled to be appointed on the subject post being eligible / qualified as employee son, but the respondents illegally refused to appoint the appellant.
5. That in the same situation some candidates who avail the chance of deceased son's quota were appointed on the post of class IV, but later on the same were again appointed as Junior clerk on deceased son's quota, therefore the appellant is also entitled to be treated the same and be appointed as Junior Clerk.
6. That the appellant was satisfied verbally by the respondents at the time of appointment on the post of class IV, that he will be appointed on the post of Junior clerk in the near future and the appellant time and again approached to the respondents to appoint him on the post of Junior clerk, but the respondents delayed the appointment of the petitioner as junior clerk on different pretext.
7. That from the inaction of the respondents the appellant disappointed and filed an application before respondent No. 3, 5 for his appointment on the post of Junior clerk, but the respondent No.3, 5 kept the application without any decision illegally just to deprived the appellant of his legal constitutional right by which the appellant filed departmental

appeal before respondent No. 2 on dated 25-01-2019 but the same has been also not decided by respondent No. 2 within the prescribed period. Resultantly the appellant approached this honorable tribunal by filing the instant appeal for the indulgence of exercising its appellate jurisdiction.

It is therefore, humbly prayed that on acceptance of the instant service appeal, the respondents may kindly be directed to appoint the appellant on the post of junior clerk in forest department on deceased son's quota being eligible and qualified.

Appellant
Hazrat Ali

Through


UMAR KHITAB

(Advocate)

Address: District Courts Gulkada Swat.
Cell No. 0345-9524854

Certificate:

It is certified that no such like appeal has earlier been filed by the appellant nor is pending or decided by this honorable tribunal.


UMAR KHITAB

(Advocate)

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

Service appeal No. _____ of 2019

Hazrat Ali S/o Mian Said Wahid Class-IV / Chowkidar at Divisional Forest Office Swat.....Appellant

VERSUS

- (1) Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar Secretariat.
- (2) Chief Conservator of Forest Region I Khyber Pakhtunkhwa.
- (3) Chief Conservator forest Malakand Forest Region III Saidu Sharif Swat.
- (4) Divisional Forest Officer at Gulkada Swat.
- (5) District Forest Officer Demarcation Swat.

.....Respondents

AFFIDAVIT

It is stated on oath that all the contents of this service appeal are true and correct to the best of my knowledge and belief. Moreover, no such like service appeal is pending before this honorable tribunal.

Deponent 

Hazrat Ali S/o Mian Said Wahid
Class-IV / Chowkidar at Divisional Forest Office Swat



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BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Service appeal No. _____ of 2019

Hazrat Ali S/o Mian Said Wahid Class-IV / Chowkidar at Divisional Forest Office Swat.....Appellant

VERSUS

Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar Secretariat & others.....Respondents

MEMO OF ADDRESSES

Address of appellant:-

Hazrat Ali S/o Mian Said Wahid Class-IV / Chowkidar at Divisional Forest Office Swat.


CNIC No. 15607-0406845-3 Cell No. 0348-9588044

Addresses of respondents:-

- (1) Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar Secretariat.
- (2) Chief Conservator of Forest Region I Khyber Pakhtunkhwa.
- (3) Chief Conservator forest Malakand Forest Region III Saidu Sharif Swat.
- (4) Divisional Forest Officer at Gulkada Swat.
- (5) District Forest Officer Demarcation Swat.

Appellant

Through


UMAR KHITAB
(Advocate)



حکومت خیبر پختونخوا پاکستان

Annex - (A)

8

THE GOVT OF KHYBER PAKHTUNKHWA PAKISTAN

وفات سرٹیفکیٹ

DEATH CERTIFICATE

CRMS No: D1560 2-12-0033

FORM No: P001490511

NATURE OF DEATH: NORMAL

درخواست دہندہ کا نام: میاں سید اقبال

درخواست دہندہ کا شناختی کارڈ نمبر: 1560216239247

پتہ: محلہ برکے گاؤں سیدو شریف، تحصیل سوات، ضلع سوات

مت علالت	وجہ موت	تاریخ دفن	جائے وفات/تاریخ	مذہب	جنس	تاریخ پیدائش	والد کا نام / شناختی کارڈ نمبر	متوفی کا نام / شناختی کارڈ نمبر
	طبعی	27-5-2011	سیدو شریف	اسلام	مرد	1-1-1959	میاں گل عہر 1560212662577	میاں سید واہد 1560203249671

APPLICANT NAME: MIAN SAID IQBAL

APPLICANT CNIC: 1560216239247 RELATION WITH DECEASED: Brother

ADDRESS: MOHALLAH BAR KALAY, VILLAGE: SAIDU SHARIF,

TEHSIL: SWAT, DISTRICT: SWAT

DECEASED NAME/ CNIC	FATHER NAME/ CNIC	DATE OF BIRTH	SEX	RELIGION	PLACE/DATE OF DEATH	DATE OF BURIAL	REASON OF DEATH	SICKNESS PERIOD
MIAN SAID WAHID 156020324 671	MIAN GUL AMBAR 1560212662577	1-1-1959	MALE	ISLAM	SAIDU SHARIF 26-5-2011	27-5-2011	NATURAL	

BLOOD RELATION PERSON CAUSING DISPOSAL OF BODY

قریبی رشتہ دار تدفین کنندہ

NAME: MIAN SAID IQBAL

نام: میاں سید اقبال

CNIC: 1560216239347

1560216239347

GRAVEYARD NAME: SAIDU SHARIF

قبرستان کا نام: سیدو شریف

ENTRY DATE: 17-7-2012

17-7-2012

ISSUE DATE: --

تاریخ اندراج:

ADDITIONAL INFORMATION:

تاریخ اجراء:

دستخط: _____

یونین کونسل سیکریٹری

سیدو شریف (62) ضلع سوات

Secretary
UNION COUNCIL
Saidu Sharif.

Umar Khitab
ADVOCATE

Annex B
جواب لٹریچر عملہ جنسولات والا لٹریچر ڈویژن سپر وائس چیمبر، لاہور

عنوان: درخواست برائے ملازمت

جواب عالی! تحریروں سے کہہ رہا ہوں کہ عملہ جنسولات میں ملازمت
درجہ ملازمت و نوائے چھانچے وفات کے وقت میں کم کر کے
آج میں 15 سال کا ہو چکا ہے۔ میرا فیلڈ ڈویژن میں ہے اس لیے
میں نے جو پندرہ لاکھ خالی اسٹیپنڈیوں پر درخواست دیا تھا، لیکن اس
خالی اسٹیپنڈی پر تبادلہ کر کے سے میرے تھوری کے اظہارات جاری ہیں
ہو سکتا۔


اپنے آپ میں سے استدعا ہے کہ میں بے روزگار
ہوں۔ اپنے اٹن اپ میں میری فرمائش کی کسی شکل کو
کے خالی اسٹیپنڈی پر لکھائی کریں، تو سہیلان ہوئی۔

شکر ہے

حوت علی ولد صاحب کمر و دروہم

سپر وائس چیمبر، لاہور

6/8/16


Umar Khitab
ADVOCATE

ADVOCATE

OFFICE ORDER NO. 131 DATED MINGORA THE: 01/03/2017, ISSUED BY
MR. MUHAMMAD YOUSAF KHAN, DIVISIONAL FOREST OFFICER SWAT FOREST DIVN:

Annex- B₁

9A

The Khyber Pakhtunkhwa, Appointment, Promotion and Transfer Rules, 1989, notified vide Government of Khyber Pakhtunkhwa Notification No.SOR-19 S&GAD 04-1/80, dated 31.01.1989 (Sub Rules-4 of Rules-10) further amended vide Govt. of Khyber Pakhtunkhwa Establishment and Administrative Department (Regulation Wing) Notification No.SOR-VI(E&D) 1-3/2003/Vol:II dated 05.09.2006 and No.SOR-VI(FEWD)1-3/2011.Vil:III dated 31.08.2012, provided that appointing authority may appoint one of the children of the deceased Government servant, who died during service period, to a post in any of the basic pay scale No.1 to 15 notwithstanding the recruitment proceedings, provided the child possesses the minimum qualification prescribed for appointment to the post.

Late Mian Said Wahid Bearerman who was serving in Forest Department in Swat Forest Division, died on 26.05.2011, the braved family of the deceased Bearermann also includes his son Mr. Hazrat Ali who has sought to be employed as Chowkidar in the Forest Department, who posses the minimum prescribed for the post.

Therefore, Mr. Hazrat Ali son of Late Mian Said Wahid is hereby appointed as Chowkidar against the existing vacancy under the above mentioned rules against the existing vacancy in BPS-3 (8040-325-17790) in Swat Forest Division.

The offer is subject to the following conditions:-

1. The appointment is purely temporary and can be terminated at any time with one month notice or on the payment of one month salary in lieu of the notice. If the incumbent intends to resign, he shall serve the department with one month notice or remit an amount equal to one month salary.
2. He will remain on probation for a period of one (1) year in terms of Section-6 (2) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
3. He shall be entitled to all service benefits/facilities admissible under the Govt. servants rules of the same cadre.
4. He shall be liable to and governed by the Govt. of Khyber Pakhtunkhwa Removal from service (Special Power) ordinance, 2000 as amended from time to time.
5. His appointment is subject to satisfactory report of verification of his character/antecedents.
6. He shall produce medical certificate of fitness from Medical Superintendent concerned as well as character certificate from the Principal of the School/College lastly attended by him.
7. The offer shall be valid for thirty days. In case the terms and conditions are acceptable to him he may report for duty within the prescribed period.

Sd/-

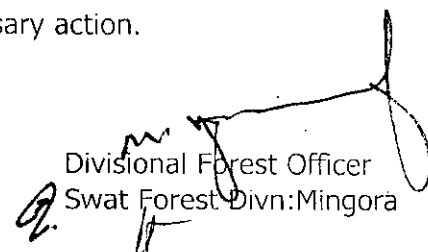
(Muhammad Yousaf Khan)
Divisional Forest Officer
Swat Forest Divn:Mingora

3845-48
No. /E,

Copy forwarded to the:-

1. Chief Conservator of Forests, Central Southern Region-I, Khyber Pakhtunkhwa Peshawar.
2. Conservator of Forests, Malakand Forest Circle East Saidu Sharif Swat.
3. Mr. Hazrat Ali son of Late Mian Saud Wahid R/O Bar Kaley Saidu Sharif Swat for information and further necessary action with reference to his application dated Nil.
4. Head Clerk/Accountant for information and necessary action.


Umar Khitab
ADVOCATE


Divisional Forest Officer
Swat Forest Divn:Mingora

15) مکلف جناب ڈی۔ ایف۔ اویس ڈیپارٹمنٹ قلعہ سورت

عنوان: درخواست برائے تقرری بحالت جوینر کلرک

جناب عالی! گھڑا شہ ہے۔ کہ میرا والد حب محمد جٹلات میں ملازمت

کے دوران انتقال ہوا ہے جس نے میرا سکینڈ ڈویژن میں پاس کیا ہے

میں نے (Deceased Okale) میں جوینر کلرک کے تقرری کیلئے درخواست

دی ہے۔ لیکن اس وقت جوینر کلرک کے اسامی نہ ہونے کے وجہ سے مجھے بحالت

کلکس فور ملازم پھرتی کیا۔ اور مجھے کیا۔ کہ جوینر کلرک کے اسامی آنے سے

آپ کو بحالت جوینر کلرک پھرتی کیا جائے گا۔

آپ لیجان سے استدعا ہے کہ ڈی۔ ایف۔ اویس ڈیپارٹمنٹ

دفتر میں جوینر کلرک کے اسامی خالی ہے۔

اسلئے اگر آپ لیجان میں رہائی فرما کر مجھے جوینر کلرک

کے اسامی میں پھرتی رہیں۔ تو دعا گو ہوں۔

✓

شکرہ
حوت علی جوینر کلرک

DFO Surat

15/01/2018

Umar Khitab
ADVOCATE

جناب کنز و سہر جب محمد جنملاں ملائڈ ڈوئٹرن سہر و شرف سہوت

عنوان :- درخواست برائے تقرری بحیثیت جوینر مکر

جناب عالی! گزارش ہے کہ میرا والد محمد جنملاں سے ملازم تھا

اور دوران ملازمت وفات پا چکا ہے۔ میں نے SSC

کیئڈ ڈوئٹرن سے پاس کیا ہے۔ اور گنیمو سہر پر بھی

مجبور حاصل ہے۔

اسیے اگر آپ عیان میرا بی وزما

جے بحیثیت جوینر مکر *Deceased Son of*

تحت ملائڈ ڈوئٹرن سے ایسی دفتر میں بحیثیت جوینر مکر


ہوتی رہے۔ توجہ ہائی ہوگی۔

لغہ کنہہ

صوت علی ولد بیان سہر و مرحوم

میر علی سہر و شرف سہوت

سہی



Umar Khitab
ADVOCATE

اعتراض :- حکمانہ آپیل برائے جوینر ملک تقرری Deceased کوٹہ

جناب عالی! اپیلانٹ حسب ذیل عرض گزار ہے۔

1۔ بہنہ آپیلانٹ کا والد حکمہ جینٹلات سموت ملازمت کے دوران وفات ہو چکا تھا۔

2۔ بہنہ من اپیلانٹ نے بتاریخ 16 اکتوبر 2016 کو Deceased کوٹہ کے تحت جوینر ملک کے تقرری کیلئے درخواست دے دیا۔

3۔ بہنہ آپیلانٹ 2016 کو سینڈ ڈریشن میں پاس کیا تھا۔ اور سابقہ کیونر ملک کا کورس بھی مکمل کیا تھا۔

4۔ بہنہ من اپیلانٹ درخواست دیتے وقت حکمہ جینٹلات سموت جوینر ملک کے اسامی خالی تھی۔ لیکن اپیلانٹ کے درخواست دیتے جوینر ملک کے خالی اسامی پر تبادلہ کیا گیا۔

5۔ بہنہ آپیلانٹ کو یہ کیا گیا کہ جوینر ملک کے خالی اسامی پر نہیں ہے۔ آپ ملاس فور کے تقرری کیلئے درخواست دے دیں۔

6۔ بہنہ جوینر ملک کے تقرری کیلئے میں نوزوں تھا۔ لیکن والد کے وفات کے وجہ سے گھر کا گزارہ مشکل تھا۔ اسلئے میں نے ملاس فور کے تقرری کیلئے درخواست دیکر حکمہ منبر تقرری بحیثیت ملاس فور بحوالہ ہوا آرڈر 3845-14 محررہ 3/17 جاری کیا۔

7۔ بہنہ اکثر محکوم میں جو اس دوران Deceased کوٹہ کے تحت ملاس فور کے اسامی پر برقی پورے ہیں۔ اور وہاں پر ~~ملاس فور~~ جیب ملکوں / اساتذہ کے خالی مسامی ہیں۔ تو وہ ملاس فور سے استعفیٰ دیکر اس ملک میں ملری یا استاد ہوتے پرتا ہے۔

8۔ بہنہ آپیلانٹ عرض گزار ہے کہ حکمہ جینٹلات میں جوینر ملک کے خالی اسامی پر میرے تقرری کیا جائے۔ تو میں ملاس فور اسامی سے استعفیٰ (Resign) دے دوں گا۔

لینڈ اسٹڈ عا ہے کہ منظوری درخواست پورا بلجوات

بالا آپیلانٹ کے ساتھ قانون کے مطابق پکسان برتاؤ کیا جائے۔ اور من اپیلانٹ کو تقرری بحیثیت جوینر ملک Deceased کوٹہ میں احکامات صادر فرمایا جائے۔

جسٹس کیندہ

حقوق علی ولد میان کیم و صوم
نائب قاضی 540 سموت

25/01/2019.

Umar Khitab
ADVOCATE

جناب نیشنل ٹریڈنگ کمپنی کے جنرل مینجنگ ڈائریکٹر اور چیف ایگزیکٹو آفیسر سے درخواست

درخواست برآمد لقیات اور ریشٹ

درخواست حسب ذیل ہے۔

1۔ بہرہ اہلانہ دو درخواستیں برآمد ملازمت جو سہ ماہی

Deceased Sons of Qatla کے تحت عمرہ 2016 کا آپ کے خدمت پیشہ

کے قے۔

2۔ بہرہ اہلانہ کو اور ریشٹ کے کارروائی کے تمام لقیات شدہ

فولڈ کے صورت 2۔

لہذا استدعا ہے کہ خیر محنتوں سے فورا

رائٹ لو انفارمیشن ایکٹ 2013 شیڈول 3 کے

تحت ہے تمام کارروائی اور ریشٹ کے لقیات شدہ فولڈ

کا پی میا کیا جائے۔ لو میربانی ہوگی۔

حرف علی جوید

ڈی۔ ایف۔ او سورت

03/04/2019

Umar Khitab
ADVOCATE

جناب ڈی. ایف۔ اوصب ڈیپارٹمنٹ قلعہ سمورت

درخواست محمد نقولت ارڈر شیٹ

درخواست حسب ذیل ۲۔

۱۔ پیمہ اپیلانٹ درخواست برائے تقرری جو سپرملرک محررہ 15/18

کو Deceased Sons Equata کے تحت اپ جہان کو پیش کیا تھا۔

۲۔ پیمہ اپیلانٹ کو ارڈر شیٹ کے کارروائی کے تمام بعدی شدہ

فوٹوکاپی کے ضرورت ۲۔

لینڈر اسٹاٹو ۲۔ کم خیر و محنتوں خواہ دائرہ لکھ

انفارمیشن ایکٹ 2013 شیٹ ۱۳ کے تحت میرا درخواست

پر مشل بر جو کارروائی ہو چکے ہیں۔ ان کے بعدی شدہ فوٹو

کا میا رے مکرز فائیں۔

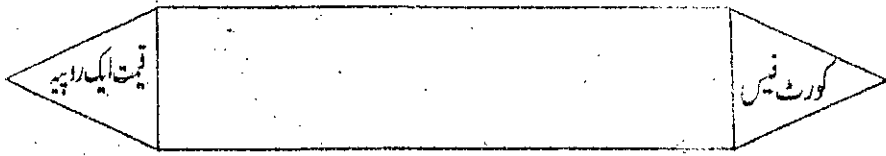
محمد
حرف علی جوگیدار

ڈی۔ ایف۔ اوصب

03/04/2019

Umar Khitab
ADVOCATE

بعد التواضع جیسے جیسے کہ اس کے ذریعے فیصلہ ہو گا کہ اس کے لئے



مورخہ ۲۰ مئی ۱۹۸۸ء
مقدمہ حضرت علی بیگم
دعویٰ کے لئے
جرم
باعت خیر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام محل کہہ لے کر اپنے لئے اس کے واسطے اس پر دستخط کرنے کا اختیار ہوگا۔ مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل احتیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برداختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ ہر جانہ التوا بے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا ادکالت نامہ لکھ دیا کہ سند ہے

حضرت علی بیگم کے لئے

السجده گواہ شدہ العہد
بمقام علی بیگم کے لئے منظور ہے

Umar Khitab
ADVOCATE
District Court Saidu Sharif Swat
0345-9524853

BEFORE THE SERVICE TRIBUNAL KHYBER
PUKHTOONKHWA PESHAWAR.

APPEAL NO _____/2019.

Hazrat Ali S/O Mian Said Wahid Class -IV /Chowkidar
Divisional Forest office Swat.....Appellant.

Versus.

1. Secretary Forest Government Khyber Puktoonkhwa
Peshawar & others. Respondents

APPLICATION FOR THE CORRECTION OF
"FOREST DEPARTMENT "INSTEAD OF
"EDUCATION DEPARTMENT" IN THE PRAYER OF
INSTANT APPEAL.

1. That the above title case is pending before this
Honorable service tribunal for today.

2. That at the time of filing the instant appeal
inadvertently the appellant wrote " Education
Department " instead of " Forest Department " in the
prayer of appeal.

3. That the above mentioned mistake was not
intentionally but occurred due to clerical mistake.

4. That there is no legal restraint on the correction of
the above clerical mistake.

It is therefore, must humbly prayed that the
correction mentioned in the Heading of this application may
kindly be ordered.

HAZART ALL.....APPELLANT.

THROUGH

UMAR KHITAB ADVOCATE.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.556 of 2019

Mr. Hazrat Alil Chowkidar of Swat Forest Division.....Appellant

Versus

- 1) Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar.
- 2) Chief Conservator of Forests, Region-I Khyber Pakhtunkhwa
- 3) Chief Conservator of Forests, Malakand Forest Region-III Saidu Sharif Swat.
- 4) Divisional Forest Officer, Swat Forest Division, Mingora
- 5) Divisional Forest Officer, Demarcation Forest Division, Mingora

Respondents

Preliminary Objection

- 1) That the appellant has got no locus standi against the respondent.
- 2) That appeal is barred by law.
- 3) That the appellant has got no cause of action.
- 4) That the appeal is incomplete.
- 5) That the appellant appeal is not maintainable.
- 6) That this Honrroubale Tribunal has got no jurisdiction.

Para-wise Comments on behalf of Respondent No.1 to 5

Respectfully Sheweth:

Facts

- 1) Pertain to the record hence no comments.
- 2) Incorrect. The appellant vide his application dated nil (**Annexure-A**) had approached DFO Swat Office for appointment as class-IV against deceased quota and accordingly he was appointed vide DFO Swat Office Order No. 131, dated 01/3/2017 (**Annexure-B**). it is the facts that the appellant not applied for the post of Junior Clerk nor any verbally promise was made with him and his request as Junior Clerk.
- 3) Incorrect as explained in para-1 above, as the appellant has exercised his option/opportunity for appointment against the post of class-IV. Therefore the request of the appellant for appointment as Junior Clerk is not justified under the rules as the opportunity of appointment against the deceased quota once availed cannot be re-considered to next high post after laps of 03 years time.
- 4) Incorrect, as per para-2 of appeal Rules 1986, stipulated period for submission of appeal to next higher authority is 30 days. However his appointment order issued on 01/3/2017 and he preferred 1st appeal to Divisional Forest Office Swat on 15/1/2018, i.e after laps of 11 months as well as wrong authority which was not processed in term of Rule 6 of the appeal Rules 1986. He preferred 2nd appeal to the Conservator of Forests on 15/1/2019, i.e after laps of 2 years time which was considered and filed being time barred, ~~which was considered and filed being time barred.~~
- 5) Incorrect as explained in Para-4 above. Impugned order/rejection order in the instant case is not issue from this office, hence not provided.
- 6) It is incorrect the appellant has appointed as Chowkidar class-IV against the deceased sons quota, and Department has given much positive response to the appellant, therefore the service appeal may kindly be dismiss on the following grounds.

Grounds

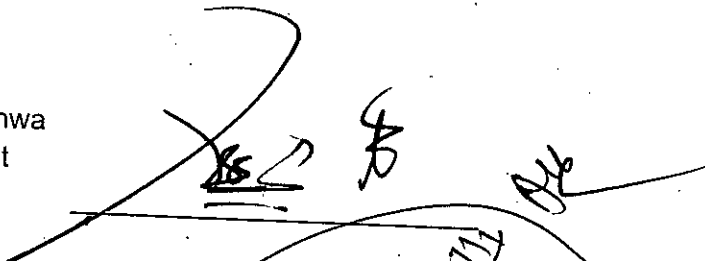
- 1) Incorrect, as explained in paras-1 & 2 of the facts above.

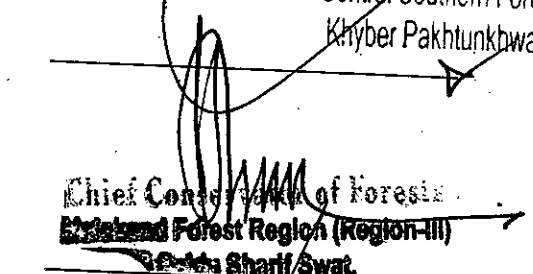
- 2) Incorrect, As explained above, the appellant may apply for appointment as Junior Clerk as and when the vacancies are available, through open competition.
- 3) Incorrect, as explained in paras-1,2 & 3 of the facts above.
- 4) In correct. He has already availed opportunity for appointed as Chowkidar and cannot be reconsidered at this belated stage.
- 5) No such positions for re-appointment of Class-IV against deceased quota as Junior Clerk are available on the record of this office.
- 6) Incorrect. No record of any such commitment whether in verbal or in written is available on our record.
- 7) Incorrect. Existing rules does not allow re-appointment of Class-IV as Junior Clerk against deceased quota.

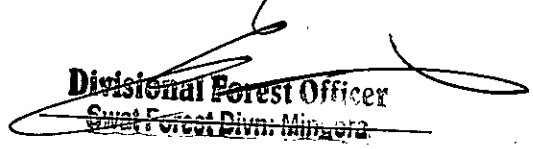
Keeping in view of the above narrated explained position, it is humbly prayed that this appeal may kindly be dismissed with cost and the entries are justified stand on solid footing.

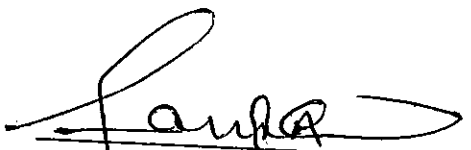
Respondents.

1. Secretary to Government of Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department Peshawar (Respondent No.1)
2. Chief Conservator of Forests, Khyber Pakhtunkhwa Central Southern Region-I Peshawar.
3. Chief Conservator of Forests, Malakand Forest Region-III Saidu Sharif Swat.
4. Divisional Forest Officer Swat Forest Division Mingora
5. Divisional Forest Officer Demarcation Forest Division Mingora


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


 Chief Conservator of Forests
 Malakand Forest Region (Region-III)
 Saidu Sharif Swat.


 Divisional Forest Officer
 Swat Forest Divn. Mingora


 Divisional Forest Officer
 Demarcation Forest Division
 Mingora Swat.

AFFIDAVIT.

It is solemnly stated on oath that all the contents of this reply/comments is true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable tribunal.


Divisional Forest Officer
Swat Forest Divn: Mingora

(Annexure-A)

جناب ڈی۔ ایف۔ او صاحب فیلسوف

عنوان :- درخواست برائے ملازمت

جناب عالی! گھڑاڑی ہے کہ میرا والد محمد حنیف صاحب سے ملازمت کے دوران انتقال ہوا تھا۔ وفات کے وقت میں کم عمر تھا۔ یہ وہ سال کا ہو چکا ہے کہ میرے والد نے ڈیڑھ سال سے باہر گیا ہے۔ میں نے جو پتہ ملازمت کے خالی اسامی پر درخواست دیا تھا لیکن اس خالی اسامی پر دوسرا ملازم بنا دیا گیا ہے۔ اس لیے میرا تفریق کی جگہ ملازمت پر یہ سزا۔

چونکہ بے روزگار ہیں۔ اپنے اراکے

جہاں میرا پانی تھا وہاں سے ملازمت کے خالی اسامی پر دوسرا ملازم بنا دیا گیا ہے۔ اس لیے میرا تفریق کی جگہ ملازمت پر یہ سزا۔

شکر

حسرت علی ولد میرا والد محمد حنیف صاحب

پتہ: سید اشرف پور

15/2/17

MOST IMMEDIATE
Court Matter

GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
(LITIGATION SECTION)

SO(Lit:)/E.D/3-335/2019
Dated Peshawar: 04/09/2019.

To,

The Divisional Forest Officer,
Swat Forest Division at Mingora.

Subject : SERVICE APPEAL NO. 556/2019 HAZRAT ALI S/O MIAN SAID
WAHID CLASS-IV/CHOWKIDAR VERSUS. SECRETARY FORESTS AND
OTHERS.

I am directed to refer to your letter No. 918/E dated: 20-08-2019 on the subject noted above and **to return herewith the draft parawise comments in the subject Service Appeal duly modified/corrected** with the request that the same may please be got **Fair/Rectified** and **resubmit to this Department/Section** for approval before further processing.

Being Court Matter may please be treated as **Most Urgent.**

Encl: As Above.

Endst: of even No. Date.


Section Officer (Litigation)

Copy is forwarded to the:

1. Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar w/r to this department letter of even No. dated: 06-08-2019.
2. Chief Conservator of Forest, Malakand Region-III. Swat for similar necessary action please.
3. Section Officer (Establishment) FE & Wildlife Department for information please.
4. PS to Secretary Forestry, Environment and Wildlife Department for information please.


Section Officer (Litigation)

** He preferred 2nd appeal to the CF on 15.1.2018 i.e after lapse of 2-year time which was considered and filed*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.556 of 2019. *Being time barred.*
 Mr. Hazrat Alil Chowkidar of Swat Forest Division.....Appellant

Versus

time barred.

- 1) Secretary Forest Government of Khyber Pakhtunkhwa at Peshawar.
- 2) Chief Conservator of Forests, Region-I Khyber Pakhtunkhwa
- 3) Chief Conservator of Forests, Malakand Forest Region-III Saidu Sharif Swat.
- 4) Divisional Forest Officer, Swat Forest Division, Mingora
- 5) Divisional Forest Officer, Demarcation Forest Division, Mingora

Respondents

Para-wise Comments on behalf of Respondent No.1 to 5

Respectfully Sheweth:

- 1) ~~It is correct.~~ *Partains to the second hence no comments.*
- 2) The appellant vide his application dated nil (Annexure-A) had approached DFO Swat Office for appointment as class-IV against deceased quota and accordingly he was appointed vide DFO Swat Office Order No. 131, dated 01/3/2017 (Annexure-B). *It is the fact that the appellant not apply for the post of J/C*
- 3) Due to non availability of vacancies of Junior Clerk the appellant was appointed as Class IV, which he joined. The request of the appellant for appointment as Junior Clerk is not justified under the rules as the opportunity of appointment against the deceased quota once availed cannot be re-considered to next high post after lapse of 03 years.

Incorrect

3. Incorrect. As explained in para-1 above. As the appellant has exercised his option for opportunity for appointment against the post of class-IV

- 4) *Incorrect. As per para-2 of Appeal Rules 1886, computed period for submission of appeal to next higher authority is 30-days. However his appointment order issued on 1-3-2017 and he preferred 1st appeal to DFO Swat on 15-1-2018 i.e after lapse of 11-months as well as wrong authority which was not processed in terms of Rule 6 of the appeal Rules 1886.*
- 5) Impugned order/rejection order in the instant case are not available on the record of this office, hence not provided.

not any provisionally promised was made with him for his appointment as J/C.

Grounds

- 1) While applying for appointment against deceased quota Class-IV vacancy was available against which request of the appellant was considered. If the appellant consider that the action was not in accordance with law, then why he availed the opportunity.

As explained in para 1, & 2 of the facts above

① Incorrect

- 2) As explained above, the appellant may apply for appointment as Junior Clerk as and when the vacancies are available, through open competition.

Incomet - As explained in para 1, 2 & 3

3) ~~The applicant while applying for appointment stated that due to non-availability of vacancies of Junior Clerks he may be appointed as Class-IV, which clearly shows that the vacancies of Junior Clerks were not available at the time of his appointment as Class-IV.~~

he has already worked

4) ~~In view of the opportunity stated cannot be re-considered at this belated stage.~~

for appointment as Charvats and

5) ~~No vacancies for re-appointment of Class-IV against deceased quota as Junior Clerks are available on the record of this office.~~

Incomet -

6) ~~Subject has not provided any records of any such commitment whether in letter or in written is available on our record.~~

Incomet -

7) Existing rules does not allow re-appointment of Class-IV as Junior Clerk against deceased quota.

Keeping in view of the above narrated explained position, it is humbly prayed that this appeal may kindly be dismissed and the entries are justified stand on solid footing.

With Lot

Respondents.

1. Secretary to Government of Khyber Pakhtunkhwa Forestry, Environment and Wildlife Department Peshawar (Respondent No.1)

2. Chief Conservator of Forests, Khyber Pakhtunkhwa Central Southern Region-I Peshawar.

3. Chief Conservator of Forests, Malakand Forest Region-III Saidu Sharif Swat.

4. Divisional Forest Officer Swat Forest Division Mingora

5. Divisional Forest Officer Demarcation Forest Division Mingora

Divisional Forest Officer Swat Forest Divn: Mingora

Amn generally promoter in this case for appointment as 'C' 11

15/2

Clerk atin

OFFICE OF THE
DIVISIONAL FOREST OFFICER
SWAT FOREST DIVISION MINGORA

No 2164 /E, Dated Mingora the: 21/12/2016.

Phone # 0946-9240260
Fax # 0946-9240260
Email. dfoswat2015@gmail.com

To,

The Conservator of Forests,
Malakand Forest Circle East,
Saidu Sharif at Shagai.

Subject:- APPOINTMENT AGAINST DECEASED QUOTA.

Memo:

Reference your office letter No.5214/E, dated 18.11.2016.

It is submitted that for the time being there is no vacancy for the post of Junior Clerk in Swat Forest Division. Therefore, the original application of Mr. Hazrat Ali son of Majid Said Wahid (late Berar man) is return herewith for faovur of further course of action, please.

Encl: As above.

Divisional Forest Officer
Swat Forest Divn: Mingora

OC

[Handwritten signature]
24/12/16

OFFICE OF THE
CONSERVATOR OF FORESTS,
MALAKAND FOREST CIRCLE EAST
SAIDU SHARIF SWAT.



Ph: 0946-9240281
Fax: 0946-9240239

No. S214 /E, Dated Saidu Sharif, the: 18/11/2016.

To

The Divisional Forest Officer,
Swat Forest Division, Mingora.

SUBJECT: APPOINTMENT AGAINST DECEASED QUOTA.

Memo:

Enclosed please find herewith application (in original) alongwith its enclosure preferred by Mr. Hazrat Ali S/O Mian Said Wahid late Naib Qasid of your division for necessary consideration as per rules.

Encl: As above.

A. J. J.
CONSERVATOR OF FORESTS,
MALAKAND FOREST CIRCLE EAST,
SAIDU SHARIF SWAT.

① E/C
[Signature]
D. F.O. Swat

② He/DFO Swat
put up for further order please
[Signature]

[Signature]
21/11

OFFICE OF THE
CONSERVATOR OF FORESTS,
MALAKAND FOREST CIRCLE EAST
SAIDU SHARIF SWAT.



Ph: 0946-9240281
Fax: 0946-9240239

No. 6403 /E,

Dated Saidu Sharif, the: 27/12/2016.

To

The Divisional Forest Officer,
Swat Forest Division, Mingora.

SUBJECT:


APPOINTMENT AGAINST DECEASED QUOTA.

Memo:

Reference your letter No.2164/E, dated 21/12/2016.

The transfer order of Junior Clerk against the vacant post in Swat Forest Division has since been withdrawn vide this office order No.21 dated 23/12/2016, therefore, the documents received with your letter under reference are returned herewith for further necessary action as per rules.

Encl: As above.


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

Swat



OFFICE OF THE
DIVISIONAL FOREST OFFICER
SWAT FOREST DIVISION MINGORA

No 2926 /E, Dated Mingora the: 24 / 01 /2017.

Phone # 0946-9240260

Fax # 0946-9240260

Email: dfoswat2015@gmail.com

To

The Conservator of Forests,
Malakand Forest Circle East,
Saidu Sharif at Shagai.

Subject:- APPOINTMENT AGAINST DECEASED QUOTA.

Memo:

P-231
Reference your office letter No. 6403/E, dated 27.12.2016.

P-7 file
It is submitted that on the withdrawal of office order No.21 dated 23.12.2016 vide your goodself office order No.26 dated 13.01.2017, there is no vacant post of Junior Clerk in this office, therefore the original application of Mr. Hazrat Ali son of Mian Said Wahid (late) is returned herewith for further course of action, please.

Encl:As above.

[Signature]
Divisional Forest Officer
Swat Forest Divn: Mingora

بسم الله الرحمن الرحيم
الحمد لله الذي هدانا لهذا
الذي كنا لنهتدي لولا أن هدانا الله
إن كرم الله ذو الجلال والإكرام
بإذن الله تعالى
والسلام على من أتى به
في ليلة القدر من ربه
والصلاة والسلام على سيدنا
محمد وآله الطيبين الطاهرين
في يومنا هذا
وآبائنا وأجدادنا
الطيبين الطاهرين
والسلام على من أتى به
في ليلة القدر من ربه
والصلاة والسلام على سيدنا
محمد وآله الطيبين الطاهرين
في يومنا هذا
وآبائنا وأجدادنا
الطيبين الطاهرين

DFO Swat
For Consideration a.s. per
rules / Policy

A. J. =
District Officer Swat
15/11

۲۵ - منوت ۱۰
داد - دار (۱۷۰۲۱۱۲۱۱)
تیم - سید (۱۷۰۲۱۱۲۱۱)
تیم - سید (۱۷۰۲۱۱۲۱۱)
تیم - سید (۱۷۰۲۱۱۲۱۱)

۲/۲/۱۷

خطاب کنز و بزرگوار محمد جنملاات قلعہ سہروت

عنوان :- درخواست برائے جوینر ملرک تھوری

جناب عالی! گزشتہ ہے کہ میرا و امیر صاحبان سے ملاقات میں ملازمت

کے دوران انتقال ہو چکا تھا۔ میں نے اپنی بہن کے حضور میں deceased
کو مل میں جوینر ملرک کے تھوری کیلئے درخواست دیا تھا۔ لیکن اس وقت جوینر ملرک
کے اسامی نہ پرنے کے وجہ سے تھوری نجیت قلعہ کی فوراً جوینر ملرک کے
اسامی پر پرنے ہے۔

آج سے معلوم ہوا ہے کہ F5 الیوری قلعہ شائع

میں جوینر ملرک کے اسامی خالی ہے۔ میں نے SSC سینڈ ڈوئٹرن میں
بھی کیا ہے۔ اور کیو بی بی بھی عبور حاصل ہے۔

اسی لئے اگر آپ بہن سے بات فرمائیں deceased کو مل میں

مجھے نجیت جوینر ملرک کے تھوری کے احکامات جاری کرے۔

تو عینہ لوڈ آرٹس ہوئی۔

شکر ہے

حوت علی ولد بہن صاحبان و امیر و ام

برقہ سہروت شہروت

Umar Khitab
ADVOCATE