


30.03.2021

Syed Noman Ali Bukhari, Advocate, for appellant is present and requested for further extension of time to deposit security and process fee. Request is accepted and last chance is given to learned counsel for the appellant to deposit security and process fee within 03 days. There-after notices be issued to the respondents for submission of written reply/comments for 15.07.2021 before D.B.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

15.07.2021

None present on behalf of the appellant.

On previous date, counsel for the appellant was present and on his request time was extended for deposit of security and process fee with last chance given to the appellant to deposit the security and process fee within 3 days. However, the same was not deposited even after availing the last chance and the appellant has also defaulted his appearance and to show cause as to why the last chance given for deposit of security and process fee was not availed. Therefore, this appeal is dismissed due to non-compliance of the order of this Tribunal. File be consigned to the record room.


Chairman

ANNOUNCED
15.07.2021

07.12.2020

Junior counsel for appellant present.

An application for grant of permission to deposit security and process was submitted which is allowed with direction to deposit the same within 3 days positively, where-after, notices be issued to respondents for submission of written reply/comments.

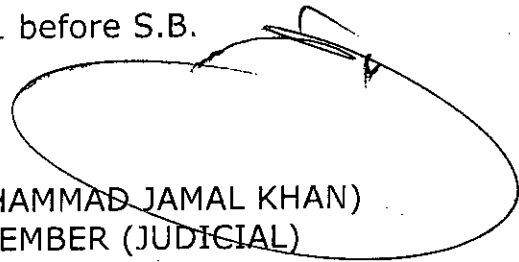
Adjourned to 27.01.2021 for reply/comments, before S.B.



(Rozina Rehman)
Member (J)

27.01.2021

Syed Noman Ali Bukhari, Advocate, for appellant is present. He submitted an application for extension in time for submission of security fee. The application is accepted with direction to deposit the security and process within three days positively, where-after, notices be issued to the respondents for written reply/comments for 30.03.2021 before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

12.08.2020

Syed Uzma, Advocate on behalf of counsel for the appellant present.

Requests for adjournment as learned counsel is engaged before the Honourable High Court in various cases today. Adjourned to 08.10.2020 before S.B. On the next date the copy of judgment in Writ Petition No. 3095/2019 shall positively be provided.

Chairman 

08.10.2020

Counsel for the appellant present.

Learned counsel referred to the notification dated 13.06.2019, whereby, a number of Naib Qasids BPS-2, including the appellant, were promoted to the post of Junior Secretary V.C/N.C BPS-09 on regular basis. On 09.08.2019 another notification was issued by respondents, whereby, the previous notification of 13.06.2019 was withdrawn. It was mentioned in the later notification that the same was being issued in pursuance to the judgment of Honourable Peshawar High Court passed in Writ Petition No. 3095-P/2019 on 01.08.2019. It is the argument of learned counsel that the appellant was never a party before the High Court in the Writ Petition. A petition under Section 12(2) CPC has, therefore, already been moved before the High Court. In addition, the appellant was never given any notice before issuance of notification dated 09.08.2019. Such act on the part of respondents tantamount to condemnation without hearing.

In view of the available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 07.12.2020 before S.B.


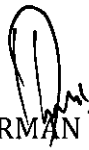

Chairman 

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4676 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/05/2020	<p>The appeal of Mr. Iftikhar Ali resubmitted today i.e 20.05.2020 by Mr. M. Asif Yousafzai 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 20/5/2020</p>
2-	11.06.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up on <u>11/06/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present.</p> <p>Learned counsel requests for adjournment in order to place on record the judgment of Hon'ble Peshawar High Court passed in Writ Petition No.3095/2019.</p> <p>May do the needful within fortnight. Adjourned to 12.08.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

P-22

PESHAWAR HIGH COURT, PESHAWAR.

ORDER SHEET

Date of Order or Proceeding	Order or other proceedings with Signature of Judge
2	3
01.08.2019	<p><u>W.P No. 3095-P/2019 with IR.</u> ✓</p> <p><u>Present:</u> Syed Saud Shah, Advocate for the petitioners.</p> <p>***</p> <p><u>MOHAMMAD IBRAHIM KHAN, J.-</u> Junaid ur Rehman alongwith 38 other petitioners, are imploring the constitutional jurisdiction of this Court with the perspective prayer:-</p> <p><i>"It is, therefore, humbly prayed that on acceptance of instant writ petition, this Hon'ble Court may very graciously be pleased to:</i></p> <ol style="list-style-type: none"><li data-bbox="722 1375 1138 1688">i. <i>Set aside/cancel the impugned letter dated <u>05.04.2018</u> and be declared as illegal, unlawful and without lawful authority and the recently amended recruitment rules be given prospective effect.</i><li data-bbox="722 1711 1138 1845">ii. <i>Direct the respondents/ department to, conduct interviews of the petitioners.</i><li data-bbox="722 1890 1138 2002">iii. <i>Direct issue appointment orders of the petitioners of their applied posts on</i>

*the basis of final merit list
issued by ETEA."*

2. The petitioners, being well qualified and bonafide residents of Khyber Pakhtunkhwa, had applied for different posts including village secretaries advertised in the month of October to December, 2017 and qualified the same through Educational Evaluation Testing Agency (ETEA) as result declared on 08.03.2018. A combined result/merit lists of the petitioners were sent to the Local Government Department, however, the respondent department notified amendment in Service Rules on 05.04.2018, wherein 20% promotion quota was reserved for Naib Qasid and in this respect issued an office letter SC(LG-1) 2-188 SSRC/2018, dated 05.04.2018, for promotion of Naib Qasid (s) to the post of Secretary.

3. Having heard arguments of learned counsel for the petitioner, available record with his valuable assistance gone through.

4. From bare perusal of the record it divulges

that in essence the petitioners prayed for declaring the office order dated 05.04.2018 as illegal, against the statute and liable to be set aside however, this Court at Abbottabad Bench through an elaborate judgment in W.P No. 86-A/2019 titled *Kamran Gulzar etc vs Government of Khyber Pakhtunkhwa through Secretary Local Government, Elections & Rural Development Department, & others* had decided the same question in para.No. 5 to 7, which reads that:-

“5. There is no cavil to the proposition that the government has got powers to amend the rules and prescribed any of the terms and conditions for its employees for betterment of service and that no one can legally object to such amendment, or consideration of their case in accordance with the earlier rules. Similarly, it is also by now well settled that the rules and regulations prevailing at the time of appointment is to be followed and not the one which were available at an earlier stage. Admittedly before the appointment order could be issued, the recruitment rules were amended through notification dated 05.04.2018 and as such whatever the amended rules provides, it is to be followed. However, in this case the interpretation given to the amended rules is not according to

law, because the earlier appointments made to the post of Junior Secretary Village/Neighborhood Council prior to the amended recruitment rules were made when at the relevant time there was 100% direct quota for initial recruitment and no promotion quota was prescribed. The recruitment rules now notified recently on 05.04.2018 cannot be given retrospective effect. The respondents/department is required to work out share for promotion as well as for initial recruitment from the available 24 vacant posts and to follow the same in accordance with the newly amended rules.

6. We have also noted that in almost all other districts, appointments were made of the advertised posts and no appointments were withheld on the ground of recent amendment.

7. For the reasons stated above, we partially allow this writ petition and direct that the recently amended recruitment rules be given prospective effect. The respondents are further directed to fill the 80% posts from the available vacant posts through direct recruitment in accordance with the advertisement so made. The respondents shall finalize the recruitment process within a period of 60 days positively."

5. Consequently, the petitioners, being

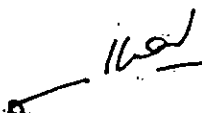
similarly placed with the petitioners of the W. P. No 86

A/2019, this writ petition is allowed in the like manner.

Announced

Dt. 01.08.2019.


JUDGE


JUDGE

(M. Fiaz) *D.B*


Hon'ble Mr. Justice Eal Jan Khattak, J
Hon'ble Mr. Justice Mohammad Ibrahim Khan, J

The appeal of Mr. Iftikhar Ali submitted today i.e. 28.04.2020 by Mr. Muhammad Asif Yousafzai, Advocate is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.

- 1- The appeal is not signed by appellant as well as advocates which may be done.
- 2- Index of the appeal is incomplete which may be completed.
- 3- Annexures of the appeal are illegible which may be replaced by legible one.
- 4- Copies of Writ Petition No. 3095/2019 and judgment of the Honourable Peshawar High Court mentioned in para-3 of the memo. of appeal are not attached with the appeal which may be placed on file.
- 5- The appeal is not pagewise/annexurewise which may be done.
- 6- Flags of annexures may be arranged.
- 7- Annexures of the appeal may be attested by the appellant or his counsel.
- 8- Facts of the appeal pertain to the case of Iftikhar Ali while grounds of appeal are taken from another appeal which may be corrected properly.
- 9- Five more copies of appeal alongwith annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1091 /S.T,

Dt. 28-4 /2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Asif Yousafzai, Advocate Peshawar.

Six

all objections

Remand

file

re-submitted.
27/5/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 4676 /2020

Iftikhar Ali

V/S

Govt: of KPK & etc.


INDEX

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-04
2.	Copy of amended rules	A	05-06
3.	Copy of promotion order	-B-	07-08
4.	Copy of seniority list	-C-	09-11
5.	Copy of 12(2) application	-D-	12-21
6.	Copy of impugned order	-E-	22
7.	Copy of departmental appeal	-F-	23-25
8.	Vakalat Nama	-----	26


APPELLANT

Iftikhar Ali

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT
OF PAKISTAN.


& 
(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

Room No. Fr-8, 4th Floor,
Bilour Plaza, Peshawar Cantt.
Contact No. 03339103240

①

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

. Appeal No. 4676 /2020

Khyber Pakhtunkhwa
Service Tribunal
Dinay No. 3115
Dated 28-4-2020

Iftikhar Ali S/o Ghualm Haider
R/O Magharbi Bandi Dhobi Tehsil & District Swabi.

APPELLANT

VERSUS

1. The Secretary Local Government & Rural Development Department Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Director General Local Government & Rural Development Department, Khyber Pakhtunkhwa, Peshawar.
3. The Assistant Director Local Government & Rural Development Department Swabi.

RESPONDENTS

.....

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 09.08.2019
COMMUNICATED ON 16.12.2019 , WHEREBY THE
PROMOTION ORDER OF THE APPELLANT HAS BEEN
WITHDRAWN ON THE BASIS OF WRONG
REFERENCE AND PRESUMPTION AND AGAINST NOT
TAKING ANY ACTION ON THE DEPARTMENTAL
APPEAL OF THE APPELLANT DESPITE THE LAPSE
OF STATUTORY PERIOD OF 90 DAYS.**

.....

PRAYER:

**THAT ON ACCEPTANCE OF THIS APPEAL, THE
ORDER DATED 09.08.2019 MAY BE SET-ASIDE BEING
WRONGLY BASED AND PRESUMPTED UPON THE
JUDGMENT OF PESHAWAR HIGH COURT WITH
FURTHER DIRECTION TO THE RESPONDENTS TO
RESTORE THE APPELLANT TO JUNIOR SECRETARY
VILLAGE POST WITH ALL BACK AND
CONSEQUENTIAL BENEFITS BEING PROPERLY
PROMOTED BY THE COMPETENT AUTHORITY
UNDER THE RELEVANT RULES. ANY OTHER
REMEDY, WHICH THIS TRIBUNAL DEEMS FIT AND
APPROPRIATE THAT MAY ALSO BE AWARDED IN
FAVOUR OF APPELLANT.**

Admitted to-day
Registrar
28/4/2020

Re-submitted to-day
and filed
Registrar
20/5/2020

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was working as Naib Qasid in District Swabi and as per Amendments in the Rules vide notification dated 05.04.2018 he was promoted to the post of Junior Secretary Village from Naib Qasid Post vide order dated 13.06.2019. **Copy of amended rules and promotion order is attached as annexure-A & B.**
2. That It is to be pointed out that while qualifying his promotion, the 20 % of the post in the Establishment in District Swabi at Tehsil level was taken into consideration by the Competent Authority which was correctly determined and about 23 Naib Qasid were promoted as Junior Village Secretaries of VCs according to their seniority lists. **Copy of seniority list is attached as annexure-C.**
3. That in meanwhile a writ petition No. 3095/2019 was filed some of the candidates alleging that the posts were advertised and they were having the rights to be appointed. In that writ petition the service rules notified on 05.04.2018 were also challenged to which the august Court was not agreed. However, the Court directed that 80% post from the available vacant post be given to initial recruitment. As he was not responded to that writ petition therefore he has filed 12(2) petitions under CPC bearing No. 39/2019 along with the prayer for not disturbing the promotion order of mine. The said petition is still sub-judice before the Peshawar High Court, Peshawar. **Copy of evidence of 12(2) application is attached as annexure-D.**
4. That At the very astonishment the order dated 09.08.2019 was passed by the Assistant Director LD&RDD Swabi and kept secret in the office whereby the promotion order dated 13.06.2019 was withdrawn while referring to the judgment of the Honorable Peshawar High Court, Peshawar without taking into consideration that no order has been passed by the Honorable Peshawar High Court wherein the promotion order dated 13.06.2019 was set aside or directed to be cancelled. Thus the one sided action was taken while wrongly referring to the directions of the High Court the promotion order dated 13.06.2019 was withdrawn by the worthy AD LG&RDD Swabi.
5. The appellant received order 09.08.2019 on dated 16.12.2019 and that too on the written request because the said order was never communicated to the appellant and also because the said order was passed without any giving any prior notice or hearing chance to the undersigned. **Copy of impugned order is attached as annexure-E.**

6. That the appellant feeling aggrieved from the impugned order dated 09.08.2019 received on 16.12.2019 filed departmental appeal which was not respondent within statutory period of 90 days. **Copy of departmental appeal is attached as annexure-F.**
7. That now the appellant comes to this august tribunal on the following grounds amongst the others.

GROUNDS:-

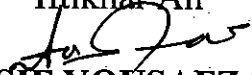
- A) That the order dated 09.08.2019 received on 16.12.2019 and not responding the departmental appeal within statutory period of 90 days are against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That the promotion order was withdrawn without proper chance of defence even without personal hearing, so the impugned order was void according to superior court judgment.
- C) That the appellant properly filed 12(2) application in which properly prayed not to disturbed the promotion order of appellant, but despite that the promotion order of the appellant has been withdrawn in violation of law and rules.
- D) That the impugned order was passed in violation of principle of Locus Poenitentiae, so the impugned order has nullity in the eye of law and liable to be set-aside.
- E) That the promotion orders dated 13.06.2019 has been passed according to law and after fulfilling all codal formalities, so the impugned order is passed without affording any opportunity to the appellant do the impugned order is void.
- F) That the promotion order was passed according to law and rules. Therefore the whole impugned action was one sided, and in violation of Article-10-A of the Constitution.
- G) That the appellant has not been dealt with in accordance with law, fair play, and principle of fair justice. Therefore, the impugned orders are liable to be set-aside.
- H) That the grounds taken in departmental appeal may also be considered as integral part of this service appeal.
- I) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

(4)

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.


APPELLANT
Iftikhar Ali

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT
OF PAKISTAN.


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

CPL 1222 / 131
 19
 Annexure II A
 05

Government Of Khyber Pakhtunkhwa
 Local Government, Elections & Rural
 Development Department

D. No. PTT
 DATED 6/4/18
 DG LOCAL GOVERNMENT

NOTIFICATION

Dated Peshawar, the 05th April, 2018

No. SO/LG-112-188/SSRC/2018.

In exercise of the power conferred by sub-rule (2) of the rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Local Government, Elections and Rural Development Department Khyber Pakhtunkhwa, in consultation with the Establishment & Administration Department and the Finance Department, hereby directs that in this Department's Notification No. DG(RWP)7(2)/73, dated 26.01.1978, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

for serial No. 10 the following shall be substituted, in the respective columns, namely:

10.	Supervisor	Atleast Second Class Bachelor's Degree from a recognized University.	21 to 30 years.	i) Seventy-five (75) per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Secretary Village / Neighborhood Council, with atleast five (05) year service as such; and ii) Twenty-five (25) per cent by initial recruitment.
-----	------------	--	-----------------	--

(b) after serial No. 15, the following new entries shall be inserted, in the respectively columns, namely.

15A.	Senior Secretary Village / Neighborhood Council.	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Secretary Village / Neighborhood Council, with atleast ten (10) year service as such. and
------	--	-----	-----	--

(c) for serial No. 16, the following shall be substituted, in the respective columns, namely:

16.	Junior Secretary Village / Neighborhood Council.	Atleast Second Class Intermediate or equivalent qualification from a recognized Board and atleast six (06) months Certificate in Computer from a recognized Institute with experience in MS-Office, Impage and Internet.	18 to 30 years.	i) Twenty (20) per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Naib Qasids and Chowkidars in the Village / Neighborhood Council, with seniority at tehsil level, having Secondary School Certificate in second division, from a recognized Board or Institute with three (03) year service as such; and
-----	--	--	-----------------	--

Scanned by CamScanner

Assistant Director (Coordination)
 Directorate General LG & RD
 Khyber Pakhtunkhwa Peshawar

Attested

P.T.O

AD (A)
 9/5
 AD (A)
 6/4/2018

P.O
 10/4
 Attested

			<p>(ii) Eighty (80) per cent by initial recruitment:</p> <p>Provided that the candidate shall be preferably a bonafide resident of the same Village / Neighborhood Council. If such candidate is not available in the same Village / Neighborhood Council then the candidates from adjacent Village / Neighborhood Council:</p> <p>Provided further that in case of non-availability of candidate from adjacent Village / Neighborhood Council then from any other Village / Neighborhood Council in that Tehsil Council.</p>
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SECRETARY TO GOVERNMENT OF KP
LOCAL GOVT. ELECTIONS & RURAL
DEVELOPMENT DEPARTMENT

No. SO(LG-12-188/SSRC/2018.-

Dated Peshawar, the 05th April, 2018

Copy forwarded to:-

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
2. All Divisional Commissioners in Khyber Pakhtunkhwa.
3. The Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
4. The PSO to Chief Minister, Khyber Pakhtunkhwa Peshawar.
5. The PSO to Chief Secretary, Khyber Pakhtunkhwa Peshawar.
6. The Director General, LG,E&RDD, Khyber Pakhtunkhwa Peshawar.
7. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
8. All Head of Attached Departments in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar, Peshawar High Court, Peshawar.
11. All District and Session Judges in Khyber Pakhtunkhwa.
12. All Assistant Directors, LG&RDD in Khyber Pakhtunkhwa.
13. The Manager Government printing press, Peshawar for publication in the next Government Gazette Notification, 40 copies of the Notification may be sent to this Department.
14. The PS to Senior Minister for LG,E&RD Khyber Pakhtunkhwa.
15. The PS to Secretary LG,E&RDD Peshawar.
16. The Office Order file.

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P.W.

Handwritten signature
Assistant Director (Coordination)
Directorate General, LG & RD
Khyber Pakhtunkhwa Peshawar

Handwritten signature
(Haji Muhammad)
SECTION OFFICER (ESTAB)
Phone # 091-9213224

Handwritten signature
Attosher

junior Secretary
order copy:
(Promotion)



**OFFICE OF THE ASSISTANT DIRECTOR
LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPTT:
SWABI**

No. 374 AD (SB -LG)/DPC

Dated Swabi the 13 /06/2019

NOTIFICATION.

Consequent upon the recommendation of the Departmental promotion committee the following Naib Qasids (BPS 02) of VC/NCs are hereby promoted to the post of junior secretary VC/NC (BPS 09) on regular basis in the best public interest with immediate effect.

Tehsil Razzar:-

S. No.	Name	Father Name
1	Inam Ullah	Wali Ullah
2	Imran Ullah	Rahim Ullah
3	Umer Ali Khan	Kamdar Khan
4	Bakhtiar Ali	Gulzar Muhammad
5	Zahir Khan	Feroz Khan
6	Ijaz Ali	Hakeem Khan
7	Safeer Ahmad	Farhan Ali
8	Said Ghani	Abdul Ghani

Tehsil Topi:-

S. No.	Name	Father Name
1	Liaqat Zaman	Bazwan
2	Islam Farooq	Muhammad Jan
3	Abdul Rahim	Nazir Muhammad
4	Bakht Zada	Noor Zaman Khan
5	Muhammad Naeem	Muhammad Saleem
6	Ramzan	Jamroz Khan

Tehsil Swabi:-

S. No.	Name	Father Name
1	Muhammad Ali	Sher Aman
2	Ayaz Ahmad	Juma Khan
3	Sohrab Muhammad	Nidar Muhammad
4	Ibrah Ahmad	Gul Raiz
5	Shah Haidar Khan	Shah Jehan
✓ 6	Iftikhar Ali	Ghulam Haider
7	Fayaz Imran	Dilawar Shah
8	Zahir Khan	Muhammad Israr Khan

Tehsil Lahor:-

S. No.	Name	Father Name
1	Muzzaffar Khan	Ihsan Ullah

Note:

1. All the above junior secretaries VC/NC will be on probation for one year extendable to next one year if required under the rules.
2. The above junior secretaries VC/NC will be attached for two weeks with their respective Tehsil Supervisors for on job training.
3. On the successful completion of their two weeks on job training their posting order will be issued separately.



ASSISTANT DIRECTOR

Local Govt: & Rural Dev: Deptt: SWABI

Endst: of Even No. & Date.

Copy to:-

1. PA To, Director General, Local Govt: & Rural Development Deptt: Khyber Pakhtunkhwa, Peshawar.
2. The District Accounts Officer.
3. Official concerned.
4. Office copy.



ASSISTANT DIRECTOR

Local Govt: & Rural Dev: Deptt: SWABI

8

Arrival Report
Copy:

To:
The Assistant Director
Local Govt: & Rural Dev: Deptt:
Swabi.

Subject: ARRIVAL REPORT
Reference: Your Office Order No:374 AD (SB-LG)/DPC dated Swabi the 13-06-2019.

In compliance of Assistant Director Local Govt: & Rural Dev: Deptt: Swabi. Office Order No:374 AD (SB-LG)/DPC dated Swabi the 13-03-2019, I beg to submit my arrival for duty today i.e 13-06-2019 (A.N) & Oblige:

Thanks

Your's Obedintly



Iftikhar Ali
Junior Secretary

Received
13/06/2019
[Signature]
Saf

~~Attested~~



**OFFICE OF THE ASSISTANT DIRECTOR
LOCAL GOVT. & RURAL DEVELOPMENT
SWABI**

Seniority list
copy

89

No. 2376 /AD (SB -LG)/DPC

Dated Swabi the 16 /11/2018.

To

All Naib Qasids,
District Swabi.

Subject: **TENTATIVE SENIORITY LIST OF NAIB QASID
VILLAGE/NEIGHBOURHOOD COUNCILS AS STOOD ON
31-10-2018 OF DISTRICT SWABI.**

Enclosed find herewith a copy of Tentative Seniority List prepared under the Rules of Naib Qasids in respect of District Swabi with the remarks that reservations on the said list, if any may be conveyed to this office on or before 20th November 2018 for consideration/ settlement before final declaration thereof. In case no objection is received by the target date, it would be presumed that no individual has any objection on the tentative seniority list.


Assistant Director*
Local Govt: & Rural Dev: Deptt:
Swabi.

Encl: Even: No. & Date.

Copy to:

The Director General, Local Govt: & Rural Development Deptt: Khyber
Pakhtunkhwa, Peshawar.


Assistant Director
Local Govt: & Rural Dev: Deptt:
Swabi.

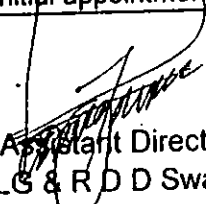
ASSISTANT

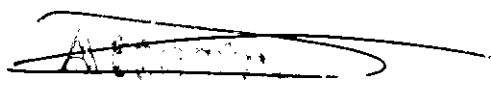
SENIORITY LIST OF NAIB QASID VILLAGE / NEIGHBOURHOOD COUNCILS OF TEHSIL SWABI AS STOOD ON 31-10-2018

S. No.	Name of Official	Date of Birth	Date of appointment in BPS	Qualification	Remarks
1	Said Ghwas	16/03/1960	29/12/1980	X	Initial appointment as Naid Qasid
2	Umer Rehman	2/2/1960	14/2/1998	Middle	Appointed in Naib Qasid in D.C Office & adjusted U/C in 2001
3	Muhammad Ali	6/4/1967	5/9/1990	FA (3)	Appointed in Naib Qasid in D.C Office & adjusted U/C in 2001
4	Muhammad Ali	1/1/1969	1/6/1992		Appointed in Naib Qasid in D.C Office & adjusted U/C in 2001
5	Sher zamin Khan	1/1/1970	23/6/1992		Appointed in Sweeper in D.C Office & adjusted as Naib Qasid U/C in 2001
6	Ayaz Ahmad	1/4/1970	27/4/1995	MA (2)	Appointed in Naib Qasid in Assistant Registrar Cooporative Society Swabi & adjusted U/C in 2001
7	Muhammad Wahab	5/4/1963	28/3/1992		Appointed in Naib Qasid in D.C Office & adjusted U/C in 2002
8	Laiq Zaman	1/1/1965	16/9/1993	Pimary	Appointed in Naib Qasid in D.C Office & adjusted U/C in 2002
9	Fida Muhammad	4/3/1966	24/09/1988		Appointed in Naib Qasid in D.C Office & adjusted U/C in 2002
10	Yousaf Maseh	1/1/1967	11/8/1990		Appointed in Naib Qasid in D.C Office & adjusted U/C in 2002
11	Awal Din	1/1/1969	30/11/1992		Appointed in Sweeper in D.C Office & adjusted as Naib Qasid U/C in 2002
12	Muhammad Hanif	1/1/1974	28/2/2007	Pimary	Initial appointment as Naid Qasid
13	Hussan Ahmad	6/4/1978	28/2/2007	Middle	Initial appointment as Naid Qasid
14	Muhammad Safdar Khan	3/3/1980	28/2/2007	BA (3)	Initial appointment as Naid Qasid
15	Qamar Zaman	7/5/1985	28/2/2007		Initial appointment as Naid Qasid
16	Umer Farooq	18/8/1985	28/2/2007		Initial appointment as Naid Qasid
17	Amjid Ali	1/1/1987	28/2/2007		Initial appointment as Naid Qasid
18	Sohrab Muhammad	20/12/1987	28/2/2007	Metric (4)	Initial appointment as Naid Qasid
19	Ibrar Ahmad	15/2/1989	28/2/2007	FA (5)	Initial appointment as Naid Qasid
20	Ilaqat Zeb	1/1/1976	17/3/2009	Middle	Initial appointment as Naid Qasid
21	Syed Nizar Ali Shah	2/3/1988	9/7/2009	Middle	Initial appointment as Naid Qasid
22	Shah Haider Khan	2/2/1973	1/8/2009	Metric (6)	Initial appointment as Naid Qasid

(4)

	Saeed Ullah	1/2/1978	4/2/2016	MA	Initial appointment as Naid Qasid
24	Ajmal Khan	17/3/1978	4/2/2016	Metric (2)	Initial appointment as Naid Qasid
25	Abdul Rahim	8/4/1981	4/2/2016		Initial appointment as Naid Qasid
26	Noor Ul Wahab	2/2/1982	4/2/2016	Middle	Initial appointment as Naid Qasid
27	Iftikhar Ali	13/3/1982	4/2/2016	BA (8)	Initial appointment as Naid Qasid
28	Fayaz Imran	16/3/1985	4/2/2016	BA	Initial appointment as Naid Qasid
29	Mujahid Ahmad	1/10/1985	4/2/2016	Middle	Initial appointment as Naid Qasid
30	Akhtar Ali	1/1/1986	4/2/2016	MA	Initial appointment as Naid Qasid
31	Amir Ali	1/1/1988	4/2/2016	Middle	Initial appointment as Naid Qasid
32	Zulqarnain	10/11/1989	4/2/2016	Nil	Initial appointment as Naid Qasid
33	Zahir Khan	2/2/1990	4/2/2016	FA	Initial appointment as Naid Qasid
34	Rawaid Ullah	1/1/1990	4/2/2016	Middle	Initial appointment as Naid Qasid
35	Muhammad Bilal	6/4/1990	4/2/2016	Metric	Initial appointment as Naid Qasid
36	Faiz ur Rahman	23/01/1992	4/2/2016	Metric	Initial appointment as Naid Qasid
37	Muhammad Bilal	30/03/1990	4/2/2016	Metric	Initial appointment as Naid Qasid
38	Muhammad Awais	22/6/1992	4/2/2016	MA	Initial appointment as Naid Qasid
39	Muhammad Haron	1/7/1992	4/2/2016	FA	Initial appointment as Naid Qasid
40	Tufail Ahmad	1/1/1996	4/2/2016	FA	Initial appointment as Naid Qasid
41	Yaseen	20/04/1996	4/2/2016	Metric	Initial appointment as Naid Qasid
42	Akhtar Ali	23/7/1988	18/8/2016	FA	Initial appointment as Naid Qasid


Assistant Director
LG & R D D Swabi



A D

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

12(2) CPC CM _____/2019

IN

WRIT PETITION NO. 3095-P/2019

Iftikhar Ali S/o Ghulam Haider,
R/o Magharbi Bandi Dodher Tehsil & District Swabi.

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat, Peshawar.
2. The Government of Khyber Pakhtunkhwa through Secretary, Local Election & Rural Development Department.
3. The Director General Local Government Khyber Pakhtunkhwa, Civil Secretariat at, Peshawar.
4. The Assistant Director, Local Government & Rural Development Department District Swat.
5. The Assistant Director, Local Government & Rural Development Department District Swat.
6. The Assistant Director, Local Government & Rural Development Department District Dir Upper.
7. The Assistant Director, Local Government & Rural Development Department District District Buner.
8. The Deputy Commissioner, Swabi,
9. The Deputy Commissioner, Buner.
10. The Deputy Commissioner, Swat.
11. THE deputy Commissioner, Dir Upper.

~~Attested~~

(A)

12. Junaid Ur Rahman S/O Maqood Ur Rehman
R/o Mohallah Moti Khel, Kunda, Tehsil Lahore, District Swabi.
13. Jahangir S/o Muhammad Ajmal Khan
R/o Ziam, Tehsil & District Swabi.
14. Zafar Ali S/o Noor Akbar
R/o Kabgani, Tehsil Topi, District Swabi.
15. Abe Hayat S/o Muhammad Hayat
R/o Karnal Sher Kallay, Tehsil Razar District Swabi.
16. Tahir Hussain S/o Fazal Said
R/O Sheikh Jana-II, Tehsil and District Swabi.
17. Hamdan Saeed S/o Umar Hayat
r/O Miany-I, Tehsil Top District Swabi.
18. Salman Khan S/o Muhammad Ali Khan
R/o Kota-I, Tehsil Top District Swabi.
19. Awais Khan S/o Muhammad Ismail
R/o Managi, Tehsil Razar, District Swabi.
20. Imran S/o Sultan Muhammad
R/o Boqo, Tehsil and District Swabi.
21. Sajjad Ahmad S/o Hayat Shah,
R/o Babbini, Tehsil and District Swabi.
22. Syed Zeeshan S/o Ghulam Shah
R/o Marghoz, Tehsil Top District Swabi.
23. Waqar Ali S/O Sabir Said
R/o Ghulaman Teshil and District Swabi.
24. Irfan Ali S/O Fazal Karim
R/o Saleem khan Tehsil and District Swabi.

Attested

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25. Akhtar Ali S/o Gul Bahadur
R/o Sheikh Jana-II, Tehsil and District Swabi.
26. Waseem Abbas S/o Muhammad Idrees
R/o Tarakai-I, District Swabi.
27. Haroon Shehzad S/o Munir Khan
R/o Yar Hussain, District Swabi.
28. Fazal Qayum S/o Mian Syed Ghafar
R/o Banarr New Kally District Swabi.
29. Farooq Shah S/o Rozi Khan
R/o Shalpin, District Swat.
30. Arif Shah S/o Bacha Khan
R/o Jora, District Swat.
31. Shahid Haroon S/o Haroon Ur Rashid,
R/o Damghar, District Swat.
32. Ikram Ullah S/o Sultan Zada,
R/o Shankad, District Swat.
33. Hazrat Ali S/o Rahim Khan
R/o Ghari Shamozi, District Swat.
34. Jamsheed Ali S/O Fazool Khan
R/O Lakhar, District Swat.
35. Gohar S/o Abdul Qayoom
R/o Dheri, District Swat.
36. Shafi Ullah S/o Shamsul Islam
R/o Arakot, District Swat.
37. Muddasir S/o Bakht Zadar
R/o Kogah, District Buner.

~~AKHTAR ALI~~

SP

38. Wajid Ali S/o Shamsher Ali
R/o Bar Gokand, District Buner.
39. Sami Ul Haq S/o Said Ghafoor Said
R/o Dheri, District Buner.
40. Fayaz Ali S/o Bashir Ul Haq,
R/o Ghor Dara, District Buner.
41. Humayon Khan S/o Said Ahmad Khan
R/O Nawagai-I, District Buner.
42. Suleman Khan S/O Bakhte Akbar
R/o Naway Killay, District Buner.
43. Tariq Ali S/o Noor Ul Haq
R/o Gul Bandi, District Buner.
44. Syed Saqib S/O Syed Mukhtar
R/o Regah-2, District Buner.
45. Syed Tariq S/o Muhammad Ali Khan
R/O District Buner.
46. Alamgir Khan S/o Muhammad Rasheed,
R/O Ali Gasir District Upper Dir.
47. Saeed Ullah S/o Sar Buland Khan
R/o Hatin Dara, District Dir Upper.
48. Sajid Ali Khan S/O Muhammad Ali Khan
R/o Ali Gasir, District Dir Upper.
49. Rizwan S/o Muhammad Wahid
R/o Chakyatan, District Dir Upper.
50. Jamil Ur Rehman S/o Gul Noor Shah,
R/o Datrorkas, Kalkot, District Dir Upper.

RESPONDENTS

Attested

PETITION UNDER SECTION 12 (2) CPC FOR SETTING ASIDE
IMPUGNED ORDER/JUDGMENT/DECREE DATED 01.10.2019
PASSED IN WRIT PETITION NO. 3095/2019 BY A DIVISIONAL
BENCH OF THIS HONORABLE COURT COMPRISING OF
HONORABLE JUSTICE MR. LAL JAN KHATTAK AND
HONORABLE JUSTICE MUHAMMAD IBRAHIM KHAN.

RESPECTFULLY SHEWETH:

FACTS:-

Brief facts giving rise to present petition are as under:-

1. That the respondents No. 12 to 50 filed a writ petition in this august Court bearing No. 3095/2019, wherein they challenged that their right of appointment was affected upon the promulgation of rules dated 05.04.2018 whereby 20% promotion quota was reserved by the respondent Local Government for promotion of Class-IV Naib Qasid. Copy of the memo of writ petition is attached as Annexure-A.
2. That the said writ petition was heard on 01.08.2019 and the case was decided without giving any notice to the respondents. Copy of the judgment/order of the Honorable Court is attached as Annexure-B.
3. It is pertinent to mention here that the petitioner of this CM was in the seniority list at Sr. no. 27 and being graduate he was promoted vide order dated 30.06. 2019.. the petitioner of this C.M reported his arrival on 13.06.2019 afternoon (A.N). The petitioner of the C.M belongs to Tehsil Swabi and was fully entitled under the law whereby 20% promotion quota was allotted for in service Class-IV eligible employees. Copies of promotion order, arrival report & seniority list are attached as Annexure-C, D & E.
4. That after receiving the copy of the judgment/order passed in writ petition No. 3095/2019, now the official respondents of District Swabi ~~and~~ intents to revert the petitioner of this C.M to Naib Qasid post despite the fact that the petitioner of this C.M was neither party to the Writ Petition nor any such defence was provided to him.

Attested

(B)

5. That as the respondents have obtained the judgment/order of the Court on the basis of misrepresentation because the respondent were fully aware of the fact that many Class-VI ^{have been} ~~should~~ promoted on the basis of notification dated 05.04.2018. therefore the petitioner of this C.M has no other remedy but to file ~~is~~ instant 12(2) application on the following grounds amongst the others.

GROUND:-

- A. That the respondents No. 12 to 50 have obtained the Honorable Court without disclosing the promotions already took place and without impleading the affectee /promotees in the main writ petition. Thus such act on the part of respondents amounts to misrepresentation and concealment of facts.
- B. That the ~~the~~ review of the Honorable Court is not based on the ^{True} ~~through~~ perspective of the law because as per law and practice, in calculating quota, the overall strength of sanctioned posts is to be taken into consideration whereas the decision is based and made effective to the available vacant post only.
- C. That the Honorable Court was also not properly assisted on the point that mere participation in test and interview, no right accrued whatsoever, ~~has~~ held in many cases by the Honorable Apex Court.
- D. That the promotion order of the petitioner of this C.M was passed on 13.06.2019 and was very much affected on the date of passing order of this august Court (01.08.2019). Therefore without impugning the promotion order of the petitioner of this C.M and without arraying him respondent in the main writ petition rights accrued to him could not be taken back.
- E. That as it is evident from the above facts and grounds the order of the Honorable Court dated 01.08.2019 passed in writ petition No. 3095/2019 by the respondents No. 12 to 50 on the basis of misrepresentation and without arraying the necessary parties and impugning their order. Therefore in such circumstances the petitioner of this C.M cannot be made to suffer in violation of principle and spirit of Article-10A of the Constitution.

~~*****~~

(E)

It is therefore most humbly prayed that on acceptance of this petition under 12(2) CPC the Judgment/order of the Court dated 01.08.2019 passed in Writ Petition No. 3095/2019 may be graciously be set aside and the petitioner of this C.M may be provided full chance of defence to meet the ends of justice

(Signature)
PETITIONER
Iftikhar Ali

THROUGH:

(Signature)
(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT
OF PAKISTAN.

(Signature)
ADVOCATE SUPREME COURT

19

8

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

12(2) CPC CM _____ /2019
IN
WRIT PETITION NO. 3095-P/2019

Iftikhar Ali

VS

Govt: of KPK & etc

AFFIDAVIT

I, Mr. Iftikhar Ali s/o Ghulam Haider, R/o Magharbi Banda Dodhera Tehsil & District Swabi petitioner do hereby solemnly affirm and declare that the contents of this C.M Application are true and correct to the best of my knowledge and belief.

DEPONENT

(Petitioner)

16202-3471842-1

ph: 03148003707

IDENTIFIED BY :

M. ASIF YOUSAFZAI
ADVOCATE, SUPREME COURT,
OF PAKISTAN.

7453

13
Sep 13
Ghulam Haider IFTIKHAR ALI
Swabi
Asif Yousafzai

13/9/19

7453

(20)

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BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

CM No. _____/2019

IN

12(2)CM No. _____/2019

IN

WRIT PETITION NO. 3095-P/2019

Iftikhar Ali

Versus

Govt: of KPK & etc.

**APPLICATION FOR RESTRAINING THE RESPONDENTS FROM
REVERTING THE PETITIONER TO THE POST OF NAIB QASID
ON THE BASIS OF THE JUDGMENT/ORDER DATED 01.08.2019
PASSED IN WRIT PETITION 3095/2019.**

1. That the petitioner has filed 12(2) petition under CPC AGAINST the judgment/order of the Honorable Court dated, 01.08.2019 along with this C.M in which no date has been fixed so far.
2. That the judgment / order of the Honorable Court in writ petition 3095/2019 dated 01.08.2019 was obtained without arraying the applicant as respondents and without affording him any chance of defence.
3. That the promotion order of the applicant dated 13.06.2019 is infield and the respondents are trying to revert the petitioner on the basis of the order/judgment of this Honorable Court to which the applicant was not a party at all. Thus the rights accrued to the applicant cannot be taken away on one sided decision.
4. That the main grounds of 12(2) Petition may also be considered as integral part of this application.
5. That the petitioner has good a prima facie case and balance of convenience is also in favour of applicant.

~~Attested~~



OFFICE OF THE ASSISTANT DIRECTOR, SWABI
LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT.


No. 570 AD (LG-SB)/ DPC

Dated Swabi the 09 10 / 2019

Notification

In compliance/pursuance to Honorable Peshawar High Court Peshawar order in Writ Petition No. 3095-P/2019 dated 01/08/2019.

The notification of promotion from Naib Qasids to post of Junior Village Secretaries issued vide No. 374 dated 13-06-2019 is hereby withdrawn.


ASSISTANT DIRECTOR
Local Govt: & Rural Dev: Deptt: SWABI

Endst: No. & date even:

Copy forwarded to:

1. The Registrar Honorable High Court Peshawar.
2. The Deputy Commissioner, Swabi.
3. The District Accounts Officer, Swabi.
4. PA to the Director General, Local Govt: & Rural Dev: Deptt., Khyber Pakhtunkhwa
5. Official concern.


ASSISTANT DIRECTOR
Local Govt: & Rural Dev: Deptt: SWABI

Received on 16 ¹²/₂₀₁₉


~~Attested~~

F
23

To,

The Director General,
Local Government & Rural Development Department
Peshawar.

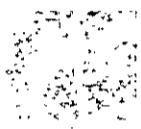
Subject: - APPEAL AGAINST THE ORDER DATED 09.08.2019
RECEIVED ON 16.12.2019 FROM THE OFFICE OF
ASSISTANT DIRECTOR LG&RDD DISTRICT SWABI.

Respectfully Sir,

1. Most profoundly it is submitted that while working as Naib Qasid in District Swabi and as per Amendments in the Rules vide notification dated 05.04.2018, I was promoted to the post of Junior Secretary Village Council from Naib Qasid Post vide order dated 13.06.2019.
2. It is to be pointed that while notifying my promotion, the 20 % of the posts in the Establishment in District Swabi at Tehsil level was taken into consideration by the Competent Authority which was correctly determined and about 23 Naib Qasid were promoted as Junior Village Secretaries of various VCs.
3. That in meanwhile a writ petition No. 3095/2019 was filed by some of the candidates alleging that the posts were advertised and they were having the rights to be appointed. In that writ petition the service rules notified on 05.04.2018 were also challenged to which the august Court was not agreed. However the Court directed that 80% post from the available vacant post be given to initial recruitment. As I was not respondent in that writ petition, therefore, I have filed 12(2) petitions under CPC bearing No. 39/2019 along with the prayer for not disturbing the promotion order of mine. The said petition is still subjudice before the Peshawar High Court, Peshawar.
4. At the very astonishment, the order dated 09.08.2019 was passed by the Assistant Director LD&RDD Swabi and kept secret in the office whereby the promotion order dated 13.06.2019 was withdrawn while referring to the judgment of the Honorable Peshawar High Court, Peshawar without taking into consideration that no order has been passed by the Honorable Peshawar High Court wherein the promotion order dated 13.06.2019 was set aside or directed to be cancelled. Thus the one sided action was taken while wrongly referring to the directions of the High Court the promotion order dated 13.06.2019 was withdrawn by the worthy AD LG&RDD Swabi.
5. The undersigned/applicant received that order dated 16.12.2019 and that too on the written request because the said order was never

Attested

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535



4/10/68

(20)

Handwritten notes and signature area, including the name "Leofax Co. Viet-Con" written vertically.

restricted to a sum of Rs. 100 per kg unless the shipper has made at the time when the cargo was handed over to Leopards a special declaration of the value of the consignment and has paid a supplementary rate. In that event Leopards liability for compensation will not exceed shippers declared value and for the claims admitted by the insurance company which ever is less. (iv) Leopards is authorized to carry the goods by Air, Train or road. 3 That Leopards reserves the right to check the cargo at the time of acceptance or delivery to ascertain the contents there in. 4 In case of damage and/or shortage of cargo, the person entitled to delivery must complain to the Leopards forth with after the discovery of the damage and in no case after seven days from the date of receipt of cargo. Every complaint must be made by notice in writing dispatched within the time stated above, failing which no action shall be valid against Leopards. 5. No agent, servant or representative of Leopards has the authority to alter modify or waive any provision of this contract. 6. The execution of the Consignment Notes is prime facie evidence of the conclusion of contract between Leopards and the consigner. **RIS**

MATERIALS NOT ACCEPTED FOR TRANSPORT

Leopards Will not carry:-

Currency, Stamps, Works of Arts, Jewellery, Precious Metal, Precious Stone, Bullion, Fire Arms, Explosive, Antique, Plants, Animals, Foodstuff, Liquor, Tobacco, Perishable, Negotiable instruments in bearer forms, Lewd obscene or Pornographic material, Industrial Carbons and Diamonds. IATA restricted article including hazardous or combustible materials, Property the carriage of which is prohibited by any law, regulation or statute of any Provincial or Federal Government of Pakistan. Leopards is not responsible for loss or damage of articles unless insured and insurance is the responsibility of the shipper



TERMS AND CONDITIONS OF CARRIAGE

Goods carried under the rules relating to liability established by the carriage by Air Act- 1934 (xx of 1934) as adopted and modified by the

Central Government of Pakistan for domestic carriage -14th March, 1963 (here in after called the Act)

Attention of the shippers is particularly invited to the following condition:- 1. Receipt by the person entitled to delivery of cargo without complaint is prime facie evidence that the goods have been delivered in good condition and in accordance with the contract of carriage. 2 Except as the Act or other applicable law otherwise requires:- (i) Leopards is not liable to shipper or to any other person for any damage, delay or loss in part or in full of what so ever nature arising out of or in connection with the carriage of the goods (ii) Leopards is not liable for any damage directly or indirectly arising due to compliance with laws, government regulation, order or requirement. (iii) In the carriage of cargo the liability of the Leopards in respect of the destruction, loss, damage, delay or non-delivery is restricted to a sum of Rs. 100 per kg unless the shipper has made at the time when the cargo was handed over to Leopards a special

VAKALAT NAMA

NO. _____/2020

IN THE COURT OF 1st Service Tribunal Peshawar

Iftikhar Ali (Appellant)
(Petitioner)
(Plaintiff)

VERSUS


Secy: LGRA etc (Respondent)
(Defendant)

I/We, Iftikhar Ali

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

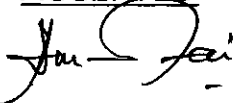
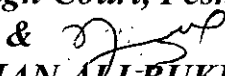
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20



(CLIENT)

ACCEPTED


M. ASIF YOUSAFZAI
Advocate Supreme Court Peshawar.
&
TAIMUR ALI KHAN
Advocate High Court, Peshawar
& 
SYED NOMAN ALI BUKHARI
Advocate High Court

OFFICE:
Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 4676/20

Iftikhar Ali Versus Local Government.

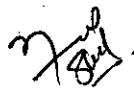
Subject: Application for extension in time for submission of security fee.

Respected Sir,

It is humbly stated that the above titled service appeal namely Iftikhar Ali versus Local Government in service appeal number 4676/20 is fixed for 'Reply' today. That due to some unavoidable reasons the appellant could not submit his security fee in time. It is, therefore, requested that an extension of 2 to 3 days may be given to the appellant for the submission of his security fee.

Appellant

Through



Syed Noman Ali Bukhari
Advocate High Court
Peshawar.

Dated 27.01.2021

Before the KP Service Tribunal, Peshawar
Appeal No: 4676/20

~~Shahzad Ali~~

vs

Yfshkor Ali

Grant of KP

Subject: Application for Extension in time for
Submitting Security Fee.

Respectfully sheweth:

1. That the above mentioned appeal is
pending before this Tribunal & is for
today in Reply stage.

2. That due to some unavoidable Reason
appeal cannot submitted the security fee.

3. That therefore the appellant requested
to extend time for submission of ~~the~~ security fee.

It is, therefore ^{requested} kindly allowed this
Application.

Appellant

through

~~the~~

Consel

STED x10 MAM Ali Bukhari

Date 7/12/20