### **BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.**

Service Appeal No. 6338/2020

Date of Institution ... 30.06.2020

Date of Decision ... 02.02.2022

Muhammad Abbas<sup>\*</sup>, Naib Qasid (BPS-03), Soil & Water Conservation, Agriculture Department, Haripur.

... (Appellant)

#### <u>VERSUS</u>

Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others.

(Respondents)

For appellant.

For respondents.

MŘ. SHAH FAISAL ILYAS, Advocate

MR. NOOR ZAMAN KHATTAK, District Attorney

MR. SALAH-UD-DIN MS. ROZINA REHMAN - MEMBER (JUDICIAL) - MEMBER (JUDICIAL)

#### JUDGMENT:

SALAH-UD-DIN, MEMBER:- Through this single judgment we intend to dispose of instant service appeal as well as connected Service Appeal bearing No. 6339/2020 titled "Hayat Khan Versus Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others" as common questions of law and facts are involved in both the appeal.

2. Brief facts forming the background of the instant service appeal as well as connected service appeal mentioned above are that the appellants Muhammad Abbas as well as Hayat Khan were appointed as Naib Qasids in Soil and Water <u>)...</u>.

Conservation Wing (Agriculture Department) in the year 1993 and 2009 respectively. No Rules were formulated for promotion of employees in Soil and Water Conservation Wing, however so many employees working in Extension as well as Engineering Wings of the same Department were promoted on the basis of rules notified on 21 November 1983, in pursuance of Rule-3(2) of APT Rules, 1989. The appellants were eligible for promotion to the post of Junior Clerks but they were not promoted, therefore, they filed separate Writ Petitions seeking their promotion to the post of Junior Clerks. In the meanwhile, rules were notified for the posts in Directorate of Soil Conservation, whereby 33% quota for promotion to the post of Junior Clerk was reserved for Naib Qasids, Chowkidars and Sweepers on the basis of seniority-cum-fitness. Upon commitment of learned AAG that the aforementioned quota will be fully observed in future, the Writ Petition No. 946-A/2017 filed by the appellant Muhammad Abbas was disposed of with the directions that the respondents shall fully observe and implement the 33% quota in letter and spirit. Similarly, Writ Petition No. 96-P/2018 filed by the appellant Hayat Khan, was disposed of with the observations that learned AAG had stated at the bar that rules were though framed, however seniority list was not prepared and that the appellant would be considered for promotion to the post of Junior Clerk, subject to availability of post. The appellants being senior most Naib Qasids were required to have been promoted to the post of Junior Clerks under the rules notified vide Notification dated 18.04.2018, however they were ignored, therefore, they filed COC in the august Peshawar High Court, Peshawar. On 20.11.2019, learned AAG stated before the worthy High Court that the appellants alongwith other candidates would be considered for promotion against the posts of Junior Clerks within a period of 04 months, therefore, COC Petition was disposed of with the directions to the respondents to live up to their commitment so made before the court and consider the appellants alongwith others for desired promotion within a period of 04 months. The order of

worthy Peshawar High Court was, however flouted by the respondents and posts of Junior Clerks were advertised despite the fact that no promotion to the post of Junior Clerk was made by the department since its establishment. The appellants filed another Writ Petition No. 3271-P/2019, which was disposed of on 19.08.2019 with the directions to the respondents to fully observe and implement the promotion policy of 33% quota reserved for Class-IV employees, in letter and spirit. The grievance of the appellants was still not redressed by the respondents rather they introduced amendments in the rules and categories of Field Watchers and Khalasis were also included in the categories of employees eligible for promotion to the post of Junior Clerks. The appellants thus filed COC Petition in the august Peshawar High Court, Peshawar, which was disposed of vide order dated 18.03.2020 with the observations that the appellants were civil servants and the controversy agitated in the Writ Petition pertained to promotion, therefore, the High Court was having no jurisdiction in the matter. It was further held that the appellants would, however be at liberty to approach the proper forum, against any action of respondents, detrimental to their rights. The appellants then filed separate departmental appeals, which were not responded within the statutory period of 90 days, therefore, the appellants preferred instant as well as connected service appeal for redressal of their grievance.

3. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions made by the appellants in their appeals.

4. Learned counsel for the appellants has contended that the appellants being senior most Naib Qasids were having prescribed educational qualification and were eligible for promotion to the posts of Junior Clerks but their promotions were not made despite availability of seats; that the appellants filed various Writ Petitions and after adopting of rules notified vide Notification dated 18.04.2018, it was committed by the respondents before the august Peshawar High Court that the

promotions to the post of Junior Clerk shall be made in compliance of the said rules but later on the respondents introduced amendments in the rules by inclusion of Field Watchers and Khalasis in the category of Class-IV for promotion to the post of Junior Clerk, thereby depriving the appellants of their due rights of promotion; that the impugned amendments in the rules have been made with mala-fide intention for the purpose of defeating the order dated 08.11.2018 passed by august Peshawar High Court, Abbottabad Bench in Writ Petition No. 946-A/2017 filed by the appellant Muhammad Abbas; that the respondents were required to have circulated the impugned amendments before notifying its, however the same were kept secret with mala-fide intention; that each cadre post has its own seniority and promotion quota, therefore, including of Felid staff with office cadres is ultra vires of service law/rules; that the right of the appellants for their promotion to the post of Junior Clerk had already matured prior to the impugned amendments in the concerned rules, therefore, the same are ineffective upon the rights of the appellant and are liable to be struck down.

5. On the other hand, learned District Attorney for the respondents has contended that according to newly framed Service Rules of Directorate of Soil and Water Conservation, 33% quota for promotion of Class-IV employees to the post of Junior Clerk is observed strictly and three Class-IV employees have already been promoted vide order dated 21.10.2020; that the appellants as per their seniority position in the seniority list of Class-IV employees shall be considered for promotion on their turn; that the impugned amendments in the Service Rules were made as per policy/rules of the Provincial Government, therefore, the appellants are having no *locus standi* to challenge the same.

6. Arguments heard and record perused.

7. The appellants are serving on the posts of Naib Qasid in Soil and Water Conservation Department. The appellant Muhammad Abbas filed Writ Petition No. 946-A/2017, seeking

promotion to the post of Junior Clerk. The aforementioned writ petition was disposed of by august Peshawar High Court, Abbottabad Bench vide order dated 08.11.2018, which is reproduced as below:-

> "Through this petition, petitioner seeks his promotion as Junior Clerk against 33% quota reserved for Class-IV employees.

> 2. Perusal of the record would reveal that vide Notification dated 18.04.2018, 33% quota for promotion to the posts of Junior Clerks has been reserved for the Naib Qasids, Chowkidars and Sweepers on the basis of seniority-cum-fitness. Learned AAG submitted at the bar that the prescribed quota will be observed in future on which learned counsel for the petitioner did not press this petition anymore.

3. In view of the above, this petition stands disposed of with directions to the respondents to fully observe and implement the 33% quota in letter and spirit."

8. Similarly, Writ Petition No. 96-P/2018, filed by the appellant Hayat Khan for his promotion to the post of Junior Clerk was disposed of by august Peshawar High Court, Peshawar vide order dated 18.12.2018, the relevant portion of which is reproduced as below:-

"When the case was taken up for hearing, learned AAG stated at the bar that rules in this regard has been framed but at the moment seniority list has not been prepared for the purpose. Further deposed that matter is in pipeline, though as and when completed petitioner will be considered for promotion to the post of Junior Clerk, subject to availability of post. Learned counsel for the petitioner when confronted with the situation, he also solicited the same.

3. With these observations, the petition in hand is disposed of."

9. While going through the orders so passed by august Peshawar High Court in the Writ Petitions filed by the appellants, it is crystal clear that the rules notified vide Notification dated 18<sup>th</sup> April 2018 were made applicable for

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recruitment/promotion initial to various posts in the Directorate of Soil and Conservation Department. According to serial No. 18 column No. 05 of the said rules, 33% posts of Junior Clerk were to be filled on basis of seniority-cum-fitness from amongst the Naib Qasids, Chowkidars and Sweepers with two years service as such, who have passed Secondary School Certificate from recognized Board. Admittedly, not a single post of Junior Clerk was filled through promotion till the rules notified vide Notification dated 18.04.2018. The appellants were serving as Naib Qasids and were having the prescribed educational qualification, therefore, respondents were required to have considered them for promotion on the basis of the rules notified vide Notification dated 18<sup>th</sup> April 2018 but promotions to the posts of Junior Clerks were delayed and in the meanwhile, vide Notification dated 18.09.2019, column No. 05 of serial No. 18 of the rules notified vide Notification dated 18.04.2018 was amended and categories of Field Watchers and Khalasis were also included in the category of employees for 33% quota of promotion to the post of Junior The amendment so Clerk. introduced vide impugned Notification 18.09.2019 affected seniority of the dated appellants adversely and their prospects for promotions were also affected adversely for the reason that Field Watchers and Khalasis were also included in the category of employees to be considered for promotion to the post of Junior Clerk. It is well settled that any amendment which deprives a person of his right has to be construed prospectively. August Supreme Court of Pakistan in its judgment reported as 2012 SCMR 965 has observed as below:-

> "8. The argument of the learned counsel for the appellant that such an approach of the Tribunal was against the spirit of the amended rule, is misconceived. The rule does not permit the department to overlook the rights of the employees created under the law by applying the amended rule to extend benefits to those who were not in run at the time when the right of the respondents for promotion was matured, but on account of unexplained reasons they were not

considered for promotion inspite of the fact that their names were mentioned in the seniority list besides the availability of the vacancies".

While seeking wisdom from the judgment of august Supreme Court of Pakistan reported as 2012 SCMR 965, we are of the view that the amendments introduced vide Notification dated 18.09.2019 could not be made applicable to the appellants, as they were entitled to be dealt with for their promotion to the posts of Junior Clerk under the rules notified vide notification dated 18.04.2018.

10. In light of the above discussion, respondents are directed to consider the appellants for their promotion to the posts of Junior Clerk on the basis of rules notified vide Notification dated 18.04.2018 as existed prior to amendments made vide Notification dated 18.09.2019. The appeal in hand as well as connected Service Appeal bearing No. 6339/2020 titled "Hayat Khan Versus Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others", are disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 02.02.2022

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(ROZINA REHMAN) MEMBER (JUDICIAL)

(SALAH-UD-DIN) MEMBER (JUDICIAL) Service Appeal No. 6338/2020

<u>O R D E R</u> 02.02.2022

Appellant alongwith his counsel present. Mr. Khalid Gohar, Deputy Director 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, respondents are directed to consider the appellants for their promotion to the posts of Junior Clerk on the basis of rules notified vide Notification dated 18.04.2018 as existed prior to amendments made vide Notification dated 18.09.2019. The appeal in hand as well as connected Service Appeal bearing No. 6339/2020 titled "Hayat Khan Versus Government of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar and two others", are disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 02.02.2022

(Rozina Rehman) Member (Judicial)

(Salah-Ud-Din) Member (Judicial)

01.02.2022

Appellant alongwith his counsel present. Mr. Khalid Gohar, Deputy Director alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Learned District Attorney sought time for arguments on the ground that he has not made preparation as the brief of the appeal was handed over to him very late. Adjourned. To come up for arguments on 02.02.2022 before the D.B.

(Rozina Rehman) Member (J)

(Salah-ud-Din) Member (J)

28.01.2022

Learned counsel for the appellant present. Mr. Khalid Gohar Deputy Director alongwith Mr. Kabir Ullah Khattak Additional Advocate General for the respondents present.

Learned counsel for the appellant submitted rejoinder, which is placed on file and copy of the same is handed over to learned Additional Advocate General. Adjourned. To come up for arguments on 01.02.2022 before the D.B.

(Rozina Rehman) Member (J)

(Salah-Ud-Din) Member (J)

28.07.2021

None for the appellant and Mr. Muhammad Adeel Butt, Learned Additional Advocate General alongwith Mr. Bilawal Shah, Stenographer for respondents present.

Due to general strike of the Peshawar Bar Association, the case is adjourned to 15.12.2021 for the same before D.B.

(Rozina Rehman) Member (Judicial)

15.12.21

DB is an Tow case to come up For the Same on Dated. 16-3-22

Chairman

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27.01.2022

Learned counsel for the appellant present. Mr. Bilawal Shah Stenographer alongwith Mr. Kabir Ullah Khattak Additional Advocate General for the respondents present.

Learned counsel for appellant seeks adjournment for submission of rejoinder. Adjourned. To come up for submission of rejoinder as well as arguments on 28.01.2022 before the D.B.

(Salah-Ud-Din) Member (J)

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(Rozina Rehman) Member (J) Nemo for the appellant. Kabirullah Khattak, Additional Advocate General and Mr. Khalid Gohar, D.D for the respondents are present.

Written reply on behalf of respondents not submitted. Representative of the department seeks further time to furnish written reply/comments. Adjourned to 31.12.2020 on which date to come up for written reply/comments before S.B

#### 31.12.2020

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney alongwith Syed Bilawal Shah, Stenographer for respondents present.

Written reply/comments on behalf of the respondents submitted which is placed on file. A copy of the same is also handed over to the appellant.

Adjourned to 13.04.2021 for rejoinder and arguments before D.B.

(Mian Muhammad) Member(E)

(MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

#### 13.04.2021

Due to demise of Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned to 28.07.2021 for the same.

21.09.2020

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Appellant Deposited

Counsel for the appellant present.

Learned counsel states that security and process fee have not been deposited by the appellant within the prescribed time due to lack of knowledge and submitted an application for permission to deposit the same. Application placed on record.

The appellant is required to deposit security and process fee within three working days from today. Thereafter, notices be issued to the respondents. To come up for written reply/comments on -09.10.2020 before S.B.

09.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

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Learned AAG seeks time to contact the respondents and procure written reply/comments. Adjourned to 11.11.2020 on which date the requisite reply/comments shall positively be furnished.

Chairman

#### Service Appeal No. 6338/2020

29.07.2020

Mr. Shah Faisal Ilyas, Advocate for appellant and appellant himself, are present.

According to the learned counsel for the appellant despite having a definite quota in the vacant seats of a given post case of the appellant has not been considered for promotion although the rules on the subject favour the case of appellant. According to the learned counsel certain posts of Junior Clerks have been advertised in the month of January directing the aspirants to apply within a period of 15 days, followed by conducting of test and interviews to the entire dis-satisfaction of appellant of which no outcome has come out so far thus jeopardizing the right of appellant who qualify the requisite criteria for being brought under consideration for the subject post and ultimate promotion.

The point agitated required proper resolution in the light of the law and rules framed, therefore, the instant appeal is admitted for regular hearing subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 01.10.2020 before S.B. Application for stay has been moved, notice of the same be also issued to the respondents for the date fixed.

> (MUHAMMAD JAMAL KHAN) MÉMBER

29.07.2020

Mr. Shah Faisal Ilyas, Advocate for appellant and appellant himself, are present.

According to the learned counsel for the appellant despite having a definite quota in the vacant seats of a given post case of the appellant has not been considered for promotion although the rules on the subject favour the case of appellant. According to the learned counsel certain posts of Junior Clerks have been advertised in the month of January directing the aspirants to apply within a period of 15 days, followed by conducting of test and interviews to the entire dis-satisfaction of appellant of which no outcome has come out so far thus jeopardizing the right of appellant who qualify the requisite criteria for being brought under consideration for the subject post and ultimate promotion.

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> (MUHAMMAD JAMAL KHAN) MEMBER

Ad attrette

Form-A

FORM OF ORDER SHEET

Court of

·/2020 Case No.-\_ 1S.No. Date of order Order or other proceedings with signature of judge proceedings 1. 2 3 The appeal of Mr. Muhammad Abbas resubmitted today by Shah 1-03/07/2020 Faisal Ilyas Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR This case is entrusted to S. bench for preliminary hearing to be put 2up there on 22/07/2020-CHAIRMAN 22.07.2020 Mr. Shah Faisal Ilyas, Advocate for the appellant is present. Preliminary hearing/arguments heard. File to come up for order on 29.07.2020 before S.B. (MUHAMMAD JAMAL KHAN) MEMBER

The appeal of Mr Hayat Khan, Naib Qasid received today i.e on 30-06-2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Annexures of appeal should be properly flagged and to be placed in sequence.

2- Memo of appeal may be got signed by appellant

NO. 1347 /S.T. Dt. 01-07/2020

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REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Shah Faisal Ilyas Adv.

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 6338 /2020

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . . RESPONDENTS

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5.	Copy of Notification and Seniority List	B	14-30
6.	Copies of Writ Petition No.946/2017, Judgment dated 08.11.2018, Rules and Seniority List	C	31-39
7.	Copy of the C.OC, Reply and Order	D	40-48
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9	Copy of the Advertisement, C.O.C No. 177-P/2020 and Order	F	61-72
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Through

feise

SHAH FAISAL ILYAS Advocate, High Court, Peshawar Cell: 0300-5850207

Dated: 29.06.2020

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

1

hyber Pakhtukhy Service Tribunal Diary No. 569 30-6-2

Service Appeal No. 6338 /2020

Muhammad Abbas, Naib Qasid (BPS-3) Soil & Water Conservation,

#### VERSUS

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar.
- Director General Agriculture, (Soil & Water Conservation), Office at Agriculture Training Institute (A.T.I) Near Khyber Teaching Hospital, Peshawar.

3. Director, Soil & Water Conservation, Haripur.

.....RESPONDENTS

# SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974.

### espectfully Sheweth:

Facts giving rise to the instant Appeal are as under:-Result of the appellant was appointed as Naib Qasid (BPSand filed. 3) on 06.04.1993, in Soil & Water Conservation Registration 3 | 7 | 7 > 2Department of Irrigation, at the time of appointment appellant was having the qualification of Matric. (Copy

#### OF THE ACADEMIC CREDENTIALS ARE ANNEXED).

- 2. That in Soil & Water Conservation Wing, there were no Rules for promotion, however, in the same Department of other wings such as Extension and Engineering dozens of persons were promoted on the strength of Rules notified on 21<sup>st</sup> November, 1983, in pursuance of the provision of Rule 3(2) of APT Rules, 1989. (Copy of THE NOTIFICATION AND SENIORITY LIST ARE ANNEXED).
- 3. That in order to get the same relief on the ground of discrimination, appellant filed a writ petition before the Hon'ble Peshawar High Court, Abbottabad Bench and thereafter respondents department notified their own Rules and thus appellant was promised to be promoted on the strength of these Rules. (Copies of the WRIT PETITION NO.946/2017, JUDGMENT DATED 08.11.2018, RULES AND SENIORITY LIST ARE ANNEXED).
- 4. That in utter violation of their own submitted Rules and judgment of Peshawar High Court, Abbottabad Bench, petitioners were not treated as per framed Rules against which C.O.C was filled in the Hon'ble Peshawar High Court, wherein reply again a U-turn was made by the Department, and after made commitment C.O.C stands disposed off. (Copy of THE C.OC, REPLY AND ORDER ARE ANNEXED).

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That again the order of the Worthy Peshawar High Court and Abbottabad Bench was tried to float and Junior Clerk posts were advertised, despite the fact that a single promotion on the same post was not made, since the formation of the department and now it was the due right of the appellant to be promoted on the strength of Rules under the prescribed quota, but the said act was challenged in the Peshawar High Court and the publication to the extent of Junior Clerk was stayed, and again on the respondents commitment of doing the needful, writ petition was disposed off. **(COPY OF THE ADVERTISEMENT, WRIT PETITION AND JUDGMENT ARE ANNEXED).** 

That again the seat of Junior clerk was advertised by the Department which was again challenged in another writ petition with a specific prayer of promotion, and the dismissed the same was on ground of maintainability, however, in C.O.C No.177-P/2020, the Hon'ble Peshawar High Court directed petitioner to go to the proper forum if any action detrimental to his right is taken. (COPY OF THE ADVERTISEMENT, C.O.C NO.177-P/2020 AND ORDER ARE ANNEXED).

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7. That amendments to the Rules of promotion were made, despite the fact that at the time of disposal of writ petitions and COCs the Rules dated 21.11.1983 were applicable. (COPY OF THE AMENDED RULES ARE ANNEXED).

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8. That appellant submitted departmental appeal to the Higher Authority i.e. Secretary, Agriculture vide proper register A.D and copies of the same duly given to the Chief Secretary, D.G, Secretary Establishment, C.M but after lapse of 90 days without any result, therefore filed the instant service appeal. (COPY OF THE DEPARTMENTAL APPEAL AND A.D EXTRACTS ARE ANNEXED).

### <u>GROUNDS:</u>

- A. That act of the respondents by not promoting the appellant is illegal, unlawful, void and ineffective, hence needs interference of this Hon'ble Tribunal.
- B. That the act of the respondents is also against the principles of natural justice, because the appellant is penalized for that wrong, which he has not done.

- C. That the act of the respondents is based on malafide and has been passed in arbitrary manner by bypassing the relevant law and facts on the subject.
- D. That performance of appellant was upto the standard as is entitled to be promoted.
- E. That amendments to the old Rules are made to defeat the judgment and adjust blue-eyed, which is illegal and malafide.
- F. That framing of Rules and placing the same before the court and then deviating from the same Rules shows malafide of respondents.
- G. The appellant has in his credit for about 27 years of continuous, regular and unblemished service record wherein he was never/ ever been punished for any disciplinary action.
- H. That no meaningful/ purposeful chance of personal hearing has been afforded to the appellant by the competent authority, so far.

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- That the impugned order is not based on true facts and figures/ rather the same is based on surmises & conjectures.
- J. That each cadre post has its own seniority and promotion quota, thus mixing field staff with office cadre is not allowed in Service Rules too.
- K. That prior to this, Department of Irrigation has already decided same nature cases in the favour of employees, thus the appellant is also entitled to be treated equally.
- L. That filling the posts of Junior Clerk amongst fresh blue-eyed shows malafide, because 36 posts of Junior Clerk have 16 posts for promotes that needs to be filled amongst employees first because since formation of Department promotion not observed.
- M. That aforementioned Rules are already challenged before this August Tribunal and are suspended to the extent of that appellants.
- N. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, humbly requested that on acceptance of this Service Appeal;

to struck down the amendment in the Rules to the extent of the appellant, being not applicable to him and appropriate orders may be passed for considering the appellant for promotion in accordance with the Rules prevalent at that very point of time;

ii. to direct respondents to comply with the ratio of promotion, which is not observed i.e. 12 out of 36 and no further appointment be made till filling the posts amongst promotes under promotion quota.

 iii. or struck down the amended Rules being not warranted under the law and Rules and based on malafide.

iv. any other relief, not specifically asked for, which this Hon'ble Tribunal deems fit and appropriate may also be granted in favour of appellant.

محمد عمب کس Appellant

Through

SHAH FAISAL ILYAS Advocate, High Court, Peshawar

# Dated: 29.06.2020

i.

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.\_\_\_\_/2020

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . . Respondents

### AFFIDAVIT

I, Muhammad Abbas, Naib Qasid (BPS-3), Soil & Water Conservation, Agricultural Department, Haripur, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPO NENT

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.\_\_\_\_/2020

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . . RESPONDENTS

APPLICATION FOR GRANT OF INTERIM RELIEF BY RESTRAINING THE RESPONDENTS FROM FURTHER FRESH APPOINTMENTS ON THE POST OF JUNIOR CLERK, TILL THE FINAL DISPOSAL OF THE CASE.

#### **Respectfully Sheweth:**

- That the above mentioned service appeal is being filed by the applicant/ appellant, in which no date of hearing has yet been fixed.
- 2. That on the face of it, the applicant/ appellant has got a strong arguable case and is sanguine about its success.

- 3. That the balance of convenience also in favour of applicant/ appellant.
- 4. That if the interim relief is not granted, then the applicant/ appellant would sustain an irreparable loss.
- 5. That grounds of main appeal may be considered as part and parcel of the instant application.

It is, therefore prayed that on acceptance of this application, the respondents may kindly be restrained from further fresh appointments on the post of Junior Clerk, till the final disposal of the main appeal.

Appellant

Through

Dated: 27.06.2020

**SHAH FAISAL ILYAS** Advocate, High Court, Peshawar

A la

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.\_\_\_\_/2020

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . . Respondents

### <u>AFFIDAVIT</u>

I, Muhammad Abbas, Naib Qasid (BPS-3), Soil & Water Conservation, Agricultural Department, Haripur, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

HIGH

DEPONENT

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.\_\_\_\_/2020

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . . Respondents

### **ADDRESSES OF THE PARTIES**

### <u>APPELLANT:</u>

Muhammad Abbas, Naib Qasid (BPS-3), Soil & Water Conservation, Agricultural Department, Haripur.

#### <u>RESPONDENTS:</u>

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Agriculture, Civil Secretariat, Peshawar.
- 2. Director General Agriculture, (Soil & Water Conservation), Office at Agriculture Training Institute (A.T.I) Near Khyber Teaching Hospital, Peshawar.
- 3. Director, Soil & Water Conservation, Haripur.

Appellant

- 3NC

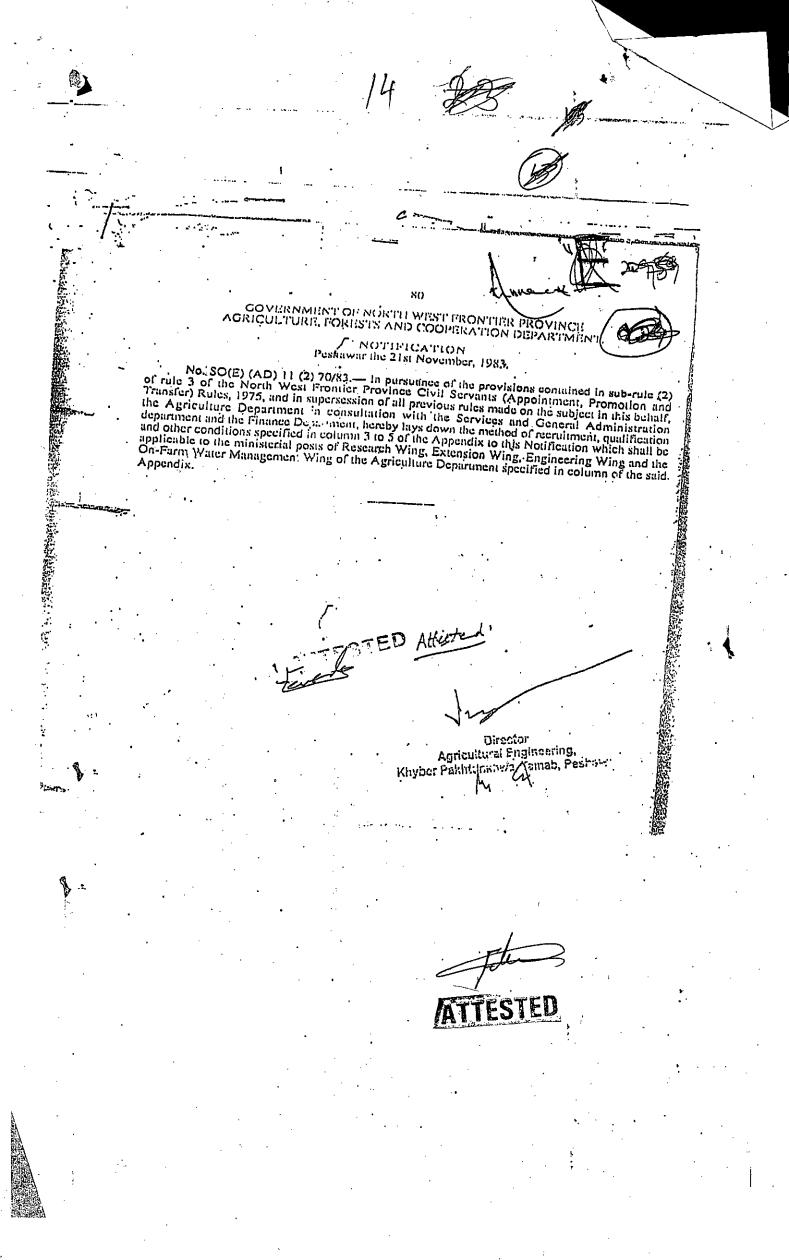
Through

Dated: 29.06.2020

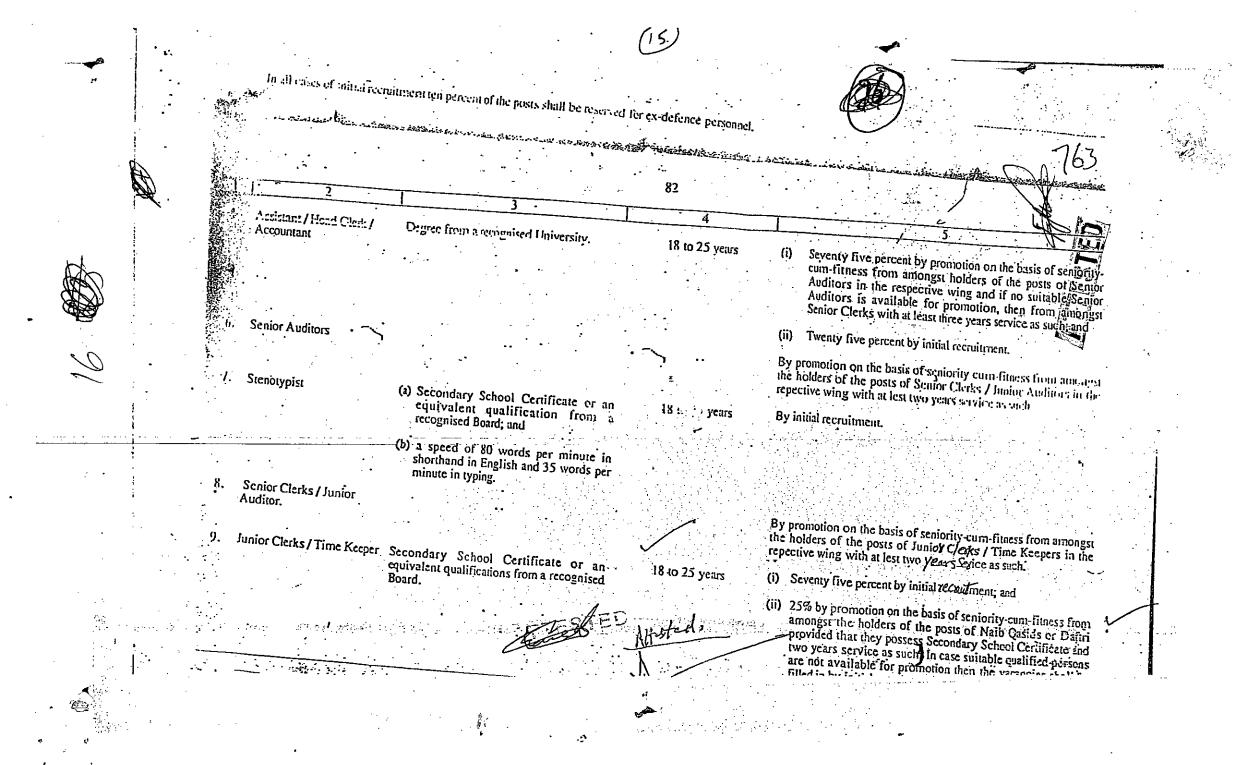
SHAH FAISAL ILYAS

Advocate, High Court, Peshawar

13 s.Nº 500311. 13302 Versen With AND SECONDARY Peshawar N.W.F.P. Pakistan Secondary School Certificate Examination SESSION 1985 SUPPLEMENTARY MAD ABBAS Roll No. THIS IS TO CERTIFY THAT \_ AEDUL LATIF Son/Daughter of . MANSEHRA DISTRICT and a student of ...... has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Peshawar held in October 1985 as 398 a Private Candidate, He/She obtained \_ \_\_\_\_ Marks out of 850 FAIR Representing \_\_\_\_ and has been placed in Grade D The Candidate passed in the following subjects: .5. PAK. STUDIES 7. GEN. MATHEMATICS 1. English 3, Islamiyat 4. GEN. SCIENCE 6. ISL: STUDIES 8. 2. Urdu He/She has been awarded Grade assessment by the Institution concerned. 10-4-1968 . . one thousand nine hundred and SIXTY EIGHT Secketan Asstt. Secretary ATTESTED



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		an and a second s		∧0 <b>−</b> 1	
Nomenta		- 81 APPENDIX	1	TESTED	
Nomenclature of Post	initial recruitment	Age Limit for appointment by initial recruitment 4	By promotion		
Administrative Officer			By promotion on the basis of seniority-cum-fitness from amoun holders of the posts of Administrative Officers / Superintrudent fife-respective wing who have passed such department examination in accounts as may be prescribed by Government the posts or equivalent to the required standard. By promotion on the basis of seniority-cum-fitnes; from amoun holders of the posts of Super-sendents in the researching	çin Stal Tor	
	•• • • • • • •	JESTED -	(i) Ninety percent by pre-notion on the basis of seniority cuffitness from amongst holders of the posts of Assistant Head Clerks / Accountants in the respective wing with least 5 years experience as such; and	5. 1917 1817 181	
Stenographer	<ul> <li>(i) Secondary School Certificate or an equivalent qualification from a recog- nised Board; and</li> </ul>	18 to 25 years	(ii) Ten percent by promotion on the basis of senierity-confitness from amongst holders of the posts of Stenographic in the respective wing with at least 5 years service experient as such who have passed departmental examination if an prescribed for Assistant.		
	nised Board; and	Attested	By promotion on the basis of seniority cum fitness from an on holders of the posts of Stenorypists in the respective wile with least three years service as such.	(N )। । 	× .
	-2 · x · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	In The second		



**N**1 5 Ø 83 Estai Middle pass 18 to 45 years By promotion from amongst the holders of the posts of Naib Qasids who are Middle passed. If no such candidate is available for promotion then the vacancy shall be filled by initial recruitment. From Qasid preferably literate 18 to 45 years By initial recruitment, Director Appientant Appiertaries, Khyber Pathafit , funch, Peshawar, in all cases of initial recruitment ten percent of the posts shall be reserved for ex-defence personnel. 



#### CHIEF MINISTER'S SECRETARIAT N-W.F.P.

No SCHECMSENWEEP4 1/2010 Dated Peshawar The 20th Fob: 2016

The Director General, Agriculture Extension, NWFP Peshawar,

Subject:-

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# ADJUSTMENT/APPOINTMENT AS JR CLI BK

Dear Sir. I am directed to forward herewith a copy of sell contained application alongwith enclosure of Mr. Nasir Ali Naib Ostaid in the office of District Officer Agriculture Mardan for adjustment/appointment on the subject post in the department and to say that he may be considered for adjustment as desired by the Honorable Chief Minister, NWFP.

#### Encl: as above

Yours faithfully

(GUL ZAREEN)

Copy to the:-

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Principal Secretary to Chief Minister, NWI P. PSO to Chief Minister, NWFP

SECTION OFFICER-II

ALA BALLAND LOUGH 12. St. X.

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## OFFICE ORDER

On the recommendations of Departmental Promotion Committee, the following Naib Qasids are hereby promoted to the post of Junior Clerk (BS-7) with i immediate effect.

1 Mr. Sher Muhammad

2. Mr. Inayat Khan.

On their promotion the following adjustment / transfer is hereby . . . ordered with immediate effect in the interest of public service.

	the second s		To
S.No.	Name	From	
1.	Sher Muhammad	DOA, Mardan	Junior Clerk
			Accounts Section
			DG's Office against
	1.		the vacant post.
		EADA, Khyber Agency.	-do- vice No.4.
2.	Inayat Khan	Junior Clerk DG's office.	Junior Clerk o/o.
3.	Akhtar Muhamamd	Junior Clerk DG & Unice.	DDA (Information)
· ·			Deshawar against
1 :			Peshawar against
Į.	• • • •		the vacant post.
		Junior Clerk / Dispatcher	Budget Section HQ
4.	l Intishamullah		office vice No.3.
		HQ office.	

Sd/-(SAIFULLAH KHAN) DIRECTOR GENERAL AGRICULTURE (EXTENSION) NWFP, PESHAWAR

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5 2008

Dated Peshawar: the InG No.18/159-A/Estt

Copy forwarded to:

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The Director Agriculture (FATA) NWFP, Peshawar.

The Deputy Director of Agriculture (FATA) Peshawar. The Extra Assistant Director of Agriculture, Khyber Agency,

The Agency Accounts Officer, Khyber Agency.

The Deputy Director of Agriculture (Information) Peshawar

The District Officer Agriculture, Mardan.

The District Accounts Officer, Mardan.

The Assistant Accounts Officer, HQ.

Officials concerned. Ē

For information and necessary action.

for record. File No.18/1/E

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DIRECTOR GENERAL

<u>\_O()</u> שימהיה התורניטסונהי אדרודיה לסורינאים בעליונסאר דור אס הנויים 1:000 TELAND The following paparticated relation/promotion goundttee is completenced for the groutedon of junior glerk grow? from the post of valb, wald annal. 1. austorul and augusteen. anaptel ernernotas 2. naprdsenvative of pictulet poordin-tion officer Hardan. . 16:201 3. section officer (sstabliehent Government of Revision Sectionalian errighture powercant Feshawr. "Lagred to W minutet officer goil geneervation. Monder. Hordena. SDEAR TOTAL STREET OFFICE . WILLIAM JEUTATUDIADA 4. eds inbang bosed(N)003 2012. 1: copy forwarded to-The Matrict Coordinenden officer Harden. The Soution Officer (astabilishafat ) (over anactof Explor pashtumkhya ariculture perartmant Reslavar. anbras of fleer concorrect in particle out - 54 STOLING POLITIC SVIIDOUS ATTESTE WOWH SEUTIOLSA: **G** ડો ' ન

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WORKI	IG PAPER.	
SUBJECT. PROMOTION	OF NATE CASID TO THE PO	ST OF JUNIOR CLERK.
1. mbere i	s only one post of juni	or clerk BPS-7 is
	meant in the office. of inservation Hardon The T	
to he f	illed by the promotion	of Naib Casid to the
	Junior Clerk, on the ba aving the following qua	sic geniority of Naib Qai
a/Becondar	y school Certificate fn	om recomised Board.
	years qualifying servi	
	of para-1 above one Nai moted to the post of ju	
	id.Dist; of Qualifi- D	
	posting. Cation. B	irth. Apptt. eligible for the
		post of Junior
1. 2 .		5 6 <u>Clerk</u> .
1. Mr. Hayat Khan.	Mardan. F.A. 9.	12.1983.9.12.09 will be decided by the commi-
		ttee.
3. Neither	disciplinary/pepartment	al proceeding/Anti-
officia		
	icial is contract employ icial isqualified as per	
Service	rules. of the official is attac	방법은 이 수요가 많이 많다.
7. The sen	lority of the official	s not attached as the
	l is only one Naib Qasid for the promotion of t	
to the post of junio	or clerk is placed befor	e the departmental
	for determining suited junior clerk at pistrict	
vation officer Mard	-	λ
j. Ne		E DISTRICT OFFICER
	ACRICU	III URE MARDAN.
	ATT	ESTER
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# QENAIB OASID (BS-03) OF SOIL CONSERVATION WING (AGRICULTURAL DEPARTMENT) KHYBER PAKHTUNKHWA PESHAWAR AS STOOD ON 31-12-2017

Sr.No		Qualification	Date of Birth	Date of 1st Appointment into Govt; Service	Date of Joining the present post	Domicile	Remarks	
<u> </u>	Mr. Muhammad Tariq		3	4	5			
2.	Mr. Khan Zada		21-01-1990	01-01-2009	01-01-2009	6	7	
3.	Mr. Azeem Khan	<del></del>	01-07-1946	08-02-1981	08-02-1981	D.I. Khan		
4.	Mr. Siraj Ali		25-03-1961	01-04-1981		Karak		
5.	Mr. Muhammad Israr.	Middle	01-07-1970	14-05-1986	01-04-1981	Peshawar -		- N CHI
6	Mr. Mumtaz Khan		22-10-1965	03-05-1987	14-05-1986	Abbottabad		
	Mr. Sadeed Gul		13-04-1963	07-05-1987	03-05-1987	Peshawar.		
8.	Mr. Haleem Jan		1956	09-05-1987	07-05-1987	Mardan	1	
9.	Mr. Bakhtawar.		01-04-1966	19-05-1987	09-05-1987	Nowshera		
10.	Mr. Umar Muhammad	Middle	16-03-1956	23-05-1987	01-05-1987	Dir Upper		
11.	Mr. Naeem Khan		01-07-1958	01-06-1987	23-05-1987	Dir Lower.		
12.	Mr. Sabz Ali		12-10-1969	29-03-1988	01-06-1987	Swat	3	
13.	Mr. Asal Din		01-07-1969	01-07-1988	29-03-1988	Swabi		10
14.	Mr. Muhammad Abas	, <u> </u>	1965	05 07 1000	06-01-2005	Mansehra.	n a se a companya a se a	0
15.	Mr. Amir Khan	Matric	10-04-1968	05-07-1992	05-07-1992	Lakki Marwat		
16.	Mr. Faiz Muhammad		01-07-1961	06-04-1993	06-04-1993 []	Haripur		
_	Mr. Fayaz Ahmad		01-01-1975	26-06-1993	<u>26-06-1993</u>	Mansehra		
18.	Mr. Farooq Khan	-	01-07-1975	15-09-1993	15-09-1993	Swat		
_	Mr. Muham		01-07-1971	15-09-1993		Swat	· • • • • • • • • • • • • • • • • • • •	
_	Mr. Muhammad Zaman Mr. Abdur Rab		12-04-1965	16-10-1994		ank		
	Ar E	]	1965	16-10-1994		barsadda		
	Mr. Farman Ali		1965	03-11-1994		attagram	•	
	Ar. Sar Anjam			19-01-1995				
	Ar. Sadir Khan		01-01-1968	03-08-1995			na cuita de la companya de la company	1
	fr. Muhammad Tariq Khan		01-07-1971	01-11-1995	^	ohat		u
<u>). [M</u>	Ir. Hayat Khan	F.A	12-01-1990				<u>/</u>	
). M	r. Atta-ur-Rehman		12-01-1983		0.0	lKhan		
<u></u> M	r. Abdul Malik (choudeidan)		01-10-1974	30.00.000		ardan		L L L
- 1 IVI	" An Sufime Mail of the	BBA (Hons)	05-02-1991	14.01.00		shawar.		l l l l l l l l l l l l l l l l l l l
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-As	adullah	T	1978	10.00	2015 Ba	ภทน	· · · · · · · · · · · · · · · · · · ·	
		B.A	08-02-1992	13-03-2015 16-02-2015				· · · ·

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# Sd/-**Director General** Soil Conservation Khyber Pakhtunkhwa Peshawar /2017 .12 -5728 /DGSC, Copy forwarded to all concerned Officials for information and with the direction to check seniority list with his official record if any query Dated at Pesh: the End: No. should be intimated to this office with a week time positively. In case of failure it will be considered as finally, Director General Soil Conservation Khyber Pakhtunkhw Peshawa NOTIFICATION. . .... In pursuance of Section -8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants

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In pursuance of Section -8 (1) of Khyber Pakhtunkhwa Crvu Servants Act, 1975 read that Kute 17 of August 1975 read that Kute 1975 read th

		Qualification.	Date of Birth.	Date of Ist	Date of Joining	Domicile > }	Remarks	
í	Sr.No.   Name and Designation	Quantication.	Date of Birth.	pare of 25.			<u> </u>	
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		42 - 44 MA	· .	<b>]</b>	· · · · · · · · · · · · · · · · · · ·			

DIRECTORATE GENERAL SOIL & WATER CONSERVATION KHYBER PAKHTUNKHWA Agriculture Services Academy (ASA) Campus, Opposite Islamia College, Jamrud Road, Peshawar, 2 http://soilconservation.kp.gov.pk @dgswckp@gmail.com (\$091-9224331 110-091-5842912 No. /DGSWC Dated: 2019 AUTHORITY LETTER Mr. Navced Hasham Soil Conservation Officer office of Director General Soil and Water Conservation, Peshawar is hereby authorized to attend and file comments in the Honorable High Court, Peshawar in COC No.200-P/2019 Hayat Khan Vs Govt: Khyber Pakhtunkhwa etc, on behalf of Respondent No.1,2,3 & 4. Director General , Soil & Water Conservation Khyber Pakhtunkhwa Peshawar - 19 - I

GOVERNMENT OF THE KEYBER PAKETUNKHWA AGRICULTURAL LIVESTOCK AND 69 COOPERATION DEPARTMENT NOTIFICATION Peshawar, dated the 18th April, 2018 No. SOE(AD)II(2)429/2015-16/SC: In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhiwa Civil Servants (Appointment Promotion and Transfer) Rules, 1989 and in supersession of all previous Notifications issued in this behalf, the Agriculture, Livestock and Co-operation Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of rescultment qualification and other conditions specified in column No.3 to 5 of the Appendix appended to this Notification, which shall be applicable to the pests mentioned in column No.2 of the said Appendix in the Directorate of Soil Conservation. APPENDIX PART-I PROFESSIONAL STAFF Nomenclature of Minimum qualification for the post. appointment by Initial recruitment Ago Limit Method of Recruitment. Director General. By promotion, on the basis of seniority cum-filness, from amongst the Directors Spil Conservation and Directors Soil Survey with at least five years' service as such in BPS-19 or seventeen years' service in BPS-17 and above, having undergone Senior Management Course. Note: A joined seniority list of Director Soil Conservation and Director Soil Survey shall be maintained for the Director purpose of promotion, By promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors Soil Conservation, Deputy Soil Conservation/ Director Soll Survey. Directors (Planning), Deputy Directors Soil Survey and District Officers Soli Conservation, having seven years' service in BPS-18 or twelve years' service in BPS-17 and above. Note: A joined seniority list of Deputy Directors. Soll Conservation, Deputy Directors (Planning), Deputy Directors Soll Survey and District Officers Soil Conservation, shall be maintained for the purpose of promotion, By Promotion; on the basis of seniority-Deputy Directors Soil · Conservation, cum-fitness, from amongst the Assistant Deputy Directors Directors (Planning Supervisory), Soll Planning, Deputy Conservation Assistants, Soil Conservation Assistants (Technical), Soil, Survey Research Officer and Directors Soil TTEST Survey/ District Оліселя Soil Assistant Soil Survey Research Officer Conservation. having five years' service as such, with minimum qualification, as prescribed in column No. 2, against serial No.4 of this Notification Notification, Note: A joined seniority list of Assistant Directors (Planning Supervisory), Soil

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Conservation Assistants, Soil Conservation Assistants (Technical), Soil Survey Research Moffleer and Assistant Soil Survey Research Offleer shall be maintained for the purpose of

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. 18.	Junior Clark	<ul> <li>(i) At least Secondary School Secondary School equivalent quality recognized Board</li> <li>(ii) a speed of the minute in typing.</li> </ul>	ication from a ; and	18 to 30 years.	
		j			<ul> <li>(b) sixty-seven percent by initial recruitment.</li> <li>Note: For the purpose of promotion, there shall , be maintained a joined seniority list of the officials i.e Naib Qasid, Chowkidar and Sweeper with reference to the dates of their acquiring the Secondary School Carificate:</li> <li>(a) If two or more officials having acquired -the Secondary School Carificate in the same session, the inter-se seniority in the lower post shall be maintained for the higher post; and the secondary in the higher post; and the secondary school Carificate in the same session, the inter-se seniority in the lower post shall be maintained for the higher post; and the secondary is the secondary in the higher post; and the secondary is the secondary in the secondary school carificate in the same session.</li> </ul>
19.	Driver.	Literate having valid license. Preference sha	I be ainma to		(b) where a senior official does not possess the requisite qualification at the time of filling of the vacancy, the official next junior to him possessing the reguisite qualification shall be promoted in preference to the senior official or officials.
20.	Driver.	in driving, repairing ar of vahicles.	ent experience	'18 to 32 years,	By initial recruitment.
-	Tracer.	At least Second Cla School Certificate with a recognized Board.	ss Secondary (Science) from	18 to 32, years,	By initial recruitment.
21.	Khlasi.	Literate,	·	18 to 40 years.	By initial recruitment.
22.	Field Watcher.	Literate.		,18 to 40	By initial recruitment.
23.	Naib Qasid.	Literate,		18 to 40	By initial requirment.
24.	Chowkidar.	Literate having sound ph	yslqu <b>e.</b>	18 to 40 years.	By initial recruitment.
25.	Sweeper.	Literate.	••	18 to 40 years,	By initial recruitment,

; Copy forwarded for information and necessary action to: -

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SD/-SECRETARY AGRICULTURE 1

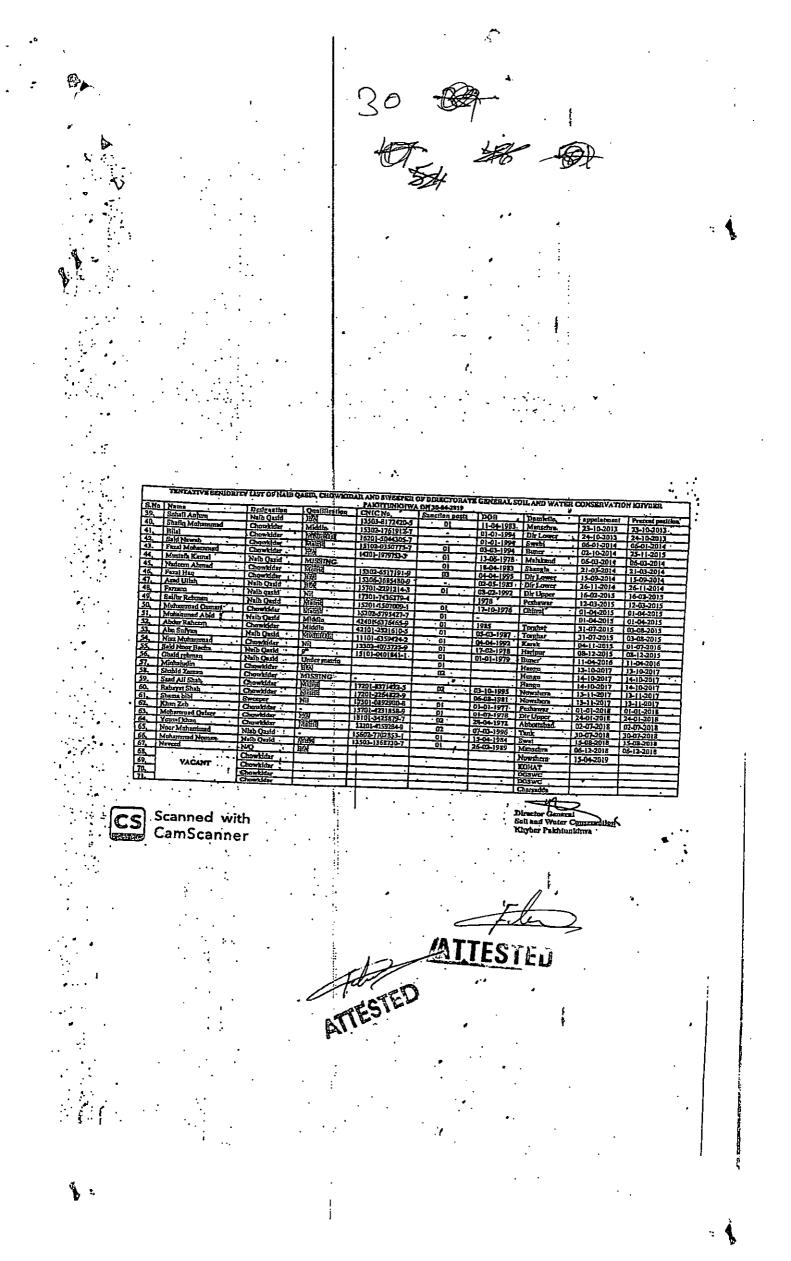
The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department. The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department. The Secretary to Govt. of Khyber Pakhtunkhwa Inance Department. The Secretary to Govt. of Khyber Pakhtunkhwa. The Director General, Soil Conservation, Khyber Pakhtunkhwa. The Director General, Soil Conservation, Khyber Pakhtunkhwa. The Manager Govt. Printing Press, Khyber Pakhtunkhwa, The Manager Govt. Printing Press, Khyber Pakhtunkhwa, Beshawar. He is requested that printed (preferable gazette) copies of the notification as and when published may be furnished to this Department, E&A and Law Department along with details of gazette in which is published. P.S to Secretary Agriculture. P.A to Deputy Secretary-Admn: Agriculture Department.

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Master file.

(MANZOOR AHMAD AFRIDI) SECTION OFFICER-ESTT: >

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# BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH

Writ Petition No. <u>946</u>-A/2017

Muhammad Abbas son of Muhammad Abdul Latif, resident of Bandi Labiyal, P.O Kund Kalu Khan, Tehsil & District, Haripur.

# ...PETITIONER

### VERSUS

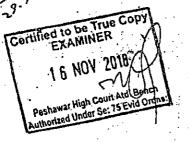
Govt. of Khyber Pakhtunkhwa, through Secretary Agriculture Livestock & Cooperative Department, Khyber Pakhtunkhwa, Peshawar.

Director General, Soil Conservation, Khyber Pakhtunkhwa, Peshawar: Section Officer Establishment, Agriculture Livestock & Cooperative Department, Khyber Pakhtunkhwa, Peshawar.

District Officer, Soil Conservation, Haripur.

ATTESTED

... RESPONDENTS



3.

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973, SOLICITING

DECLARATION TO THE EFFECT THAT PETITIONER BEING 'ELIGIBLE AND QUALIFIED TO BE APPOINTED, AS JUNIOR CLERK AGAINST 33% QUOTA OF CLASS-IV EMPLOYEES IN THE DEPARTMENT WHICH ILLEGAL, UNLAWFUL, WITHOUT IS LAWFUL AUTHORITY, WITHOUT JURISDICTION, MALAFIDE, AMOUNTS TO REFUSAL, ARBITRARY, UNILATERAL, PERVERSE, DISCRIMINATORY AND CONSEQUENTLY OF NO LEGAL EFFECT : UPON THE RIGHTS OF THE PETITIONER.

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PRAYER: ON ACCEPTANCE OF THE INSTANT WRIT PETITION, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO APPOINT THE PETITIONER AS JUNIOR CLERK AGAINST 33% QUOTA RESERVED FOR CLASS-IV EMPLOYEES ON THE NEXT AVAILABLE VACANCY OF JUNIOR CLERK. ANY OTHER RELIEF DEEMED FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

ATTESTED

Certified to be True

1 6 NOV 2018

Respectfully Sheweth:

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That the petitioner was appointed as Naib Qasid in the department vide order dated 901 - 04. Copy of appointment order is attached as Annexure "A"

That the petitioner is serving in the department with dedication and devotion. The petitioner is entitled for appointment as Junior Clerk against 33% quota reserved for Class-IV employees. Copy of relevant rulé, is attached as Annexure "B".

That respondents' de artment advertised 02 posts of Junior Cle but the petitioner is not being appointed/ Jmoted as Junior Clerk against 33% quot reserved for Class-IV employees.

That the petitioner has ad his level best to c. ince the respondence, but they paid no her whatsoever to the genuine and const tional right of the petitioner.

That feeling aggrieved of the afore-stated situation, the petitioner has come to this Honourable Court, assailing the impugned act of respondents being unwarranted at law and facts, inter-alia, on the following grounds;-

# GROUNDS:

5,

Cartified to be True Cop EXAMINER

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That the impugned act of respondents is illegal, unlawful, without lawful authority, malafide, discriminatory, arbitrary, perverse. The petitioner fulfills the requisite criteria for appointment as Junior Clerk.

That, respondents have not treated petitioner in accordance with law, rules and policy on the subject and acted in violation of Article-4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully ignored the petitioner on other occasions which is unjust, unfair,

illegal, hence not sustainable in the eyes of law.

That a right has accrued to the petitioner as and when the posts of Junior Clerks were fallen vacant, therefore, act of respondents is against the right duly accrued to the petitioner.

That as per recruitment policy, 30% of the appointments of Junior Clerks shall be made from amongst the Class-IV employees working in the department. In the instant case, the said policy has been violated. As such, the impugned act of respondents is not maintainable at law and the power is being misused arbitrarily to the detriment of the petitioner without any rhyme or reason. Therefore, the act of respondents is not legally maintainable and is liable to be set aside with the directions to appoint.

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the petitioner as Junior Clerk against the available vacancy.

That no other efficacious, speedy adequate remedy is available to the petitioner except the instant constitutional petition.

That notice/ intimation of filing the instant writ petition against the respondents has duly been served upon respondents through the registered post. Copies of notice & receipt are attached as Annexure "C".

That valuable rights of the petitioner g. . are involved in the matter.

That court fee stamp worth Rs. 500/is attached;

That other grounds shall be urged at the time of arguments. Cartified to be True Copy

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It is therefore, humbly prayed that on acceptance of the instant writ petition, respondents may graciously be directed to appoint the petitioner as junior clerk against 33% quota reserved for Class-IV employees on the next available vacancy of junior clerk. Any other relief deemed fit and proper in the circumstances of the case.

# Dated: 28.5 /2017

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3.

...PETITIONER

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TITIONER

# VERIFICATION:

Verified on oath that the contents of foregoing writ petition are true and conrect to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Certified

BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH

38

Writ Petition No. 246 -A/2017

Muhammad Abbas son of Muhammad Abdul Latif, resident of Bandi Laabian, P.O Kund Kalu Khan, Tehsil & District, Haripur.

... PETITIONER

### VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Agriculture Livestock & Cooperative Department, Khyber Pakhtunkhwa, Peshawar & others.

... RESPONDENTS

DEPONENT

OBL

# WRIT PETITION

# AFFIDAVIT

I, Muhammad Abbas son of Muhammad Abdul Latif, resident of Bandi Laabian, P.O Kund Kalu Khan, Tehsil & District, Haripur, do hereby declare on oath that the contents of foregoing writ petition are true and correct to the best of my knowledge and belief and that nothing has been suppressed form this Honourable Court.  $133_{2} - 0494673 - 1$ 

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# PESHAWAR HIGH COURT, ABBOTTABAD BENCH FORM OF ORDER SHEET

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Court of.....

39

Case No.....of

Date of Order of	Order du alter
Proceedings	Order or other Proceedings with Signature of Judge (s)
. 1	2
08.11.2018	WP No. 946-A/2017.
	Present: Mr. Arshad Khan Tanoli, Advocate for petitioner.
•	Mr. Yasir Zahoor Abbasi
	Muhammad Khan Divisional Assist: Director Food, Hazara, Abbottabad.
	***
·	LAT. JAN WHATTHE T
	LAL JAN KHATTAK, J. Through this petition, petitioner
	soons his promotion as Junior Clerk against 33% quote recommend
	2. Perusal of the record would reveal that vide
•. •.	addition dated: 18.04.2018, 33% quota for promotion to the
•	The station Clerks has been reserved for the North Clerks
	and Sweepers on the basis of seniority and the
	Learned AAG submitted at the bar that the prescribed quota will
	be fully observed in future on which learned counsel for
	petitioner did not press this petition anymore.
• • •	4. In view of the above, this petition stands disposed
	of with directions to the respondents to fully observe and
	implement the 33% quota in letter and spirit.
	in the spirit.
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High Court And Ar Sei 73 Ev	
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FORE THE HONOUR WAR HIGH ( PESH

C.O.C. No. 2001 In

W.P.No.96-P/2018

 Hayat Khan, Naib Qasid BPS-3, Soil Conservation Agricultural Department Mardan, Khyber Pakhtunkhwa.
 Muhammad Abbas Naib Qasid BPS-3 Soil Conservation Agricultural Department Haripur, Khyber Pakhtunkhwa.
 Asad Ullah, Naib Qasid, Soil Conservation Agricultural Department Upper Dir, Khyber Pakhtunkhwa.

Fazal Muhammad, Naib Qasid, Soil Conservation Agricultural Department Bathila Malakand, Khyber Pakhtunkhwa

### VERSUS

1. Mr. Israr, Secretary A igulture, Civil Secretariat, Peshawar.

2. Mr. Zahoor Khak, Director General, Agriculture (Soil & Water Conservation), Khyber Pakhtunkhwa, Peshawar.

3. Mr. Jamil Ur Rehman, Director, Soil & Water Conservation, M. Jan.

ATTESTE

Deputy Registrar 08 MAR 2019

DATA\Shah Falsel ilyes Adv\Hayat Khan C.O.C.

APPLICATION UNDER ARTICLE 204 OF THE CONSTITUTION R/W S: 3. 5 OF THE CONTEMPT OF COURT ORDINANCE 2003 ALL ENABLING PROVISIONS FOR NITIATING CONTEMPT OF COURT <u>PROCEEDING</u> AGAINST THE RESPONDENTS/ CONTEMNORS WELL ΔĊ AS FOR THE IMPLEMENTATION OF THE ORDER/ JUDGMENT OF THIS HON'BLE COURT DATED 18.12.2018 IN WRIT PETITION NO.96-P/2018,

# Respectfully Sheweth:

That

-FILED TODAY

Deputy Registrar 08 MAR 2019

That the petitioner No.1 had earlier filed a Writ Petition No.96-P/2018 for the red ssal of his grievance against the respondents, which is disposed of on 18.12.2018 in his favour. (Copies of V r Petition and Order/ Judgment DATED 18.12.2018 ARE TACHED AS ANNEXURE "A" & "B" RESPI (VELY).

> kewise petitioner 2.2 also moved Writ Petition: /2017 before this : unourable Court Abbottabad

> > AI

Bench for the same relief, which was disposed of in petitioner's favour, vide order/ judgment dated 08.11.2018. (Copies of Writ Petition and Order/ Judgment DATED 08.11.2018 are ATTACHED as ANNEXURE "C" & "D" RESPECTIVELY).

42

That petitioners approached the respondents through an application for their promotion in the light of order/ judgment dated 18.12.2018 passed by this Hon'ble Court (Principal Seat) and order/ judgment dated 08.11.2018 (Abbottabad Bench), which was processed by the office. (Copy of Application Alongwith Covering Letter IS ATTACHED AS ANNEXURE "E").

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That the respondents made a seniority list in which Field Watchers were given preference and were entered in the seniority with the petitioners and the petitioners have been deprived, despite of 33% promotion quota, on the basis of seniority-cum-fitness as per Part-III (Ministerial Staff) of the Notification dated 18.04.2018. (Copies of the Seniority List and Comments ALONGWITH Notification dated 18.04.2018 are ATTACHED as ANNEXURE "F" & "G" RESPECTIVELY).

FILED TODAY Deputy Registrar 0.8 MAR 2019 OC200-2019- Hayat Klash VS lar TFSI

That the respondents are badly failed to implement the order/ judgment of this Honourable Court and prolonging the matter:

5.

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7.

That on 01.03 2019, four persons were promoted from Junior Clerk to Senior Clerk and now four seats are vacant upon which the petitioners' case if the respondents/contemnors deem fit can consider. (Cory OFTHE NOTIFICATION FOR PROMOTION IS ATTACHED AS ANNEXURE "H").

That the act of the respondents against their own commitment/ the law on the subject and natural justice as well as the order/ judgment of this Hon'ble Court.

It is, therefore most humbly prayed on acceptance. of this application/ petition, the Contempt of Court proceeding may please be initiated, against the respondents and they may strictly be directed to implement the order of this Hon'ble. Court dated, 18.12.2018 in the best interest of justice.

Petitioners Through Shah Faisal Ilyas Dated: 07.03.2019 Advocate High Cou FILED TODAY Peshawar Deputy Kegistrar 08 MAR 2019 ERTIFIED TO BE CC200-20 ATTESTED

# BEFORE THE HONORABLE HIGH COURT, PESHAWAR.

# COC No.200-P/2019 Hayat Khan S/O Abdul Wahab

~1.96/18

### PETITIONER

# VERSUS

RESPONDENT

1. Mr. Israr Secretary Agriculture Civil Secretariat Peshawar. Mr. Yaseen Khan Director General Soil and Water Conservation Khyber Pakhtunkhwa, Peshawar. Mr. Jamil ur Rahman Director Soil and Water Conservation, Mardan. Mr. Noor ud Daula District Officer Soil Conservation, Haripur.

## INDEX

S.No	Description of Document		
1.	Para wise comments	Annexure	Pages
2.	Affidavit	· · · · · · · · · · · · · · · · · · ·	1-2
З.	Authority Letter		. 3'
4	Service Rules		4:
5.	Tentative Seniority List of	Armer A	5.
	Class-IV Employees.	Annen-B	6

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E Deputy Accessionat 2.1 MAY 2019 ATTESTED

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# BEFORE THE HONOURABLE HIGH COURT AWAR

COC.No. 200 - P /2019

Hayat Khan S/O Abdul Wahab .....

### VERSUS

- 1. Mr. Israr Secretary Agriculture Civil Secretariat Peshawar.
- 2. Mr. Yaseen Khan Director General Soll & water conservation Khyber Pakhtunkhwa
- 3. Mr. Jamil Ur Rahman Director Soll & Water conservation Mardan.
- 4. Mr Noor Ud Daoula District officer soll conservation Haripur.

REPONDENTS

PETITIONER

# O THE CONTEMPT PETITION

# Respectfully Sheweth

- Agreed
- 2. Agreed

3, Agreed

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Not agreed. As per service rules notified on 18-04-2018 (Annex-A), a joint seniority list of the officials (Annex-B) i.e Naib Qasid, Choikidar, and sweeper is prepared and is circulated in all sub- offices of directorate General Soll and Water Conservation for observation and confirmation. Not. Agreed, to the extent that Order/Judgment of this honorable court is not badly failed to implement and delayed, as this office has not made any recruitments / appointment from the date of verdicts of the petitioner 1 and 2 respectively till date. In this regards a tentative seniority list is circulated among all sub. Offices for observation and confirmation. Agreed. The case of petilioner is under process/ consideration. They should be promoted according to the approved final seniority list. No comments.

ATTESTER

TODAY

PRAYER

It is there for most most humbly prayed that on acceptance of this Para-wise comments, the appeal being devoid of legal footings and merit graciously be dismissed with cost.

(Respondent No.1)

Mr. Israr Secretary Agriculture Civil Secretariat Peshawar

Respondent No. 3

Mr. Jamil Ur Rahman Director Soil & Water conservation Mardan.

Respondent No. 2

Mr. Yaseen Khan Director General Soll & water conservation Khyber Pakhtunkhwa Peshawar,

**Respondent No.4** 

. . .

Mr Noor Ud Daoula District officer soil conservation Haripur.

# AFFIDAVIT

1 do hereby solemnly affirm and declare that the contents of the accompanying reply in the above titled case are true and correct to the best of my knowledge and belief.

STED

DEPONENT

FILED/IDDAY . 6. Deputy Registral 2 1 MAY 2

BEFORE THE HONORABLE HIGH COURT, PESHAWAR

# COC No. 200-P/2019

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Hayat Khan S/O Abdul Wahab .....

### PETITIONER

### VERSUS

1. Mr. Israr Secretary Agriculture Civil Secretariat Peshawar.

Mr. Yaseen Khan Director General Soil and Water Conservation Khyber Pakhtunkhwa, Peshawar. Mr. Jamil ur Rahman Director Soil and Water Conservation, Mardan. Mr. Noor ud Daula District Officer Soil Conservation, Haripur.

### RESPONDENT

### AFFIDAVIT

I Naveed Hasham (Soll Conservation Officer, Directorate General Soil and Water Conservation Khyber Pakhtunkhwa, Peshawar) do hereby solemnly affirm and declare on oath, that the content of accompanied parawise comments are true and correct to the best of my knowledge and belief & nothing has been suppressed from this Honorable Court.

Deponent

17301-2520811-1 D393-3656089

No:. 292 Certified that the above was verified on solemnly affirmation before me in office, this. day of who was identified b Who is personally htm ia ning

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Deputy legistrai 2 1 MAY 2818

# PESHAWAR HIGH COURT, PESHAWAR. FORM "A" FORM OF ORDER SHEET.

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	Serial No of order or proceeding	Date of Order . or Proceeding	Order or other proceedings with Signature of judge or Magistrate and that of parties or counsel where necessary	· · · ·
	<u> </u>	. 2	3	
·		20.11.2019.	COC No.200-P/2019 in W.P.No.96-P/2018, Present:- Mr.Shah Faisal liyas, Advocate for	
		. •	the petitioner.	
· ·			Mr.Moeen-ud-Din Hamayun, A.A.G for respondents.	
			LAL JAN KHATTAK, J:- The latter stated that	$\sum$
			the petitioner would be considered alongwith other	{ · · · ·
••			candidates for promotion against the post of Junior	
G	·	1	Clerk within a period of four months.	
			2. In view of the above, this petition stands	· · ·
			disposed of with direction to the respondents to live	
	•		up to their commitment so made before this court	>
<b>1</b>			and consider the petitioner alongwith others for the	).
			desired promotion within the above period.	
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			JUDGE	
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	<u>SAG</u>		HON'BLE NR JUSTICE LAL JAN RHATTAK A HON'BLE NR JUSTICE ANMED ALL	
of Presentation	of Application	-24////fc	CERTIFIED TO BETRUE	COPY
ying fee			Examiner Peshawar High Court_Peeh	awar
11	9/		Authorised Under Article 8, The Ganune-Shahadat Orde	.7 01
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sived By		- C.C.P.	ATTECT-	
	<u></u> 6	7	ALLESTED	
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# BEFORE THE HONBLE PESHAWAR HIGH COURT PESHAWA

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### Writ Petition No.\_\_\_/2019

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Hayat Khan, Nalb Qasid BPS-3, Soll Conservation Agricultural Department Mardan, Khyber Pakhtunkhwa. Muhammad Abbas Nalb Qasid BPS-3 Soil Conservation Agricultural Department Harlpur, Khyber Pakhturkhwa. Asad Ullah; Nalb Qasid, Soll Conservation Agricultural Department Upper Dir, Khyber Pakhtunkhwa.

Fazal Muhammad, Naib Qasid, Soil Conservation Agricultural Department Bathila Malakand, Khyber Pakhtunkhwa

VERSUS

Government of Khyber Pakhtunkhwa through Secretary. Agriculture, Civil Secretariat, Peshawar.

2. Director General Agriculture, (Soil & Walter Conservation), Office at Agriculture Training Institute (A.T.I) Near Khyber Teaching Hospital, Peshawar.

Director, Soil 8. Iter Conservation, Mardan,

4. District Officer, Conse

1.

Conservation, Haripur.....Respondents

AMINER

vp3271 2019 Hayal-khan ve Govi juli USB 51 PG

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WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973.

# Respectfully Sheweth:

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The petitioners very humbly submit as under:

That petitioners are law abiding citizen of Pakistan and having fundamental rights guaranteed by the Constitution of slamic Republic of Pakistan, 1973

That the petitioner No.1 had earlier filed a Writ Petition. No.96-P/2018 for the redressal of his grievance of promotion under the reserved quota against the respondents, which was disposed of on 18.12.2018 in his favour. (Cories of WRIT PETITION AND ORDER/ JUDGMENT DATED 18.12.2018 ARE ATTACHED AS (NNEXURE "A" & "B" RESPECTIVELY).

That likewise petitioner 0.2 also moved Writ Petition No.946/2017 before this Honourable Court Abbottabad Bench for the same relief, which was disposed of in petitioner's favour, vide order/ judgment j dated 08.11.2018. (Copies of WRIT PETITION AND ORDER/ Judgment DATED 08.11.2018 ARE ATTACHED AS ANNEXURE "C" & "D"

ESTED

That petitioners approached the respondents through an application for their promotion in the light of order/ Judgment dated 18.12.2018 passed by this Hon'ble Court (Principal Seat) and order/ Judgmenf dated 08.11.2018 (Abbottabad Bench), which was processed by the office

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5. That on 01.03.2019, four persons were promoted from Junior Clerk to Senior Clerk and now four seats are vacant upon which the petitioners' case if the respondents/confemnors deem fit can consider. (Copy OF THE NOTIFICATION FOR PROMOTION IS ATTACHED: AS ANNEXURE

6. That the said vacant posts were advertised in daily AAJ and Mashriq, on 30<sup>th</sup> & 31<sup>st</sup> of May, 2019 and the respondents are intentionally avoiding: Their own Commitment as well as judgment of this Honourable Court. (Copy of the Advertisement is Attached as ANNEXURE

"E");

p3271 2019 Heyes-khen ve Covi full USB 51 PG

TESTED

That the petitioners are serving in the Agriculture Department Soil Conservation Wing as Naib Qasid (BPS-03), on the strength of qualification of FA/B.A etci at the time of appointment and since the establishment of the wing no promotion was made and seats of the Junior Clerk were filled through initial recruitment.

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That in the Agriculture Department posts of Junior Clerks exist, and as per netification No. SO(E)(AD)11(2)429/15 dated 18<sup>th</sup> April 2018 in pursuance of the provision in Sub-rule (2) of the Rule 3 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules 1975, laid down the method of the recruitment, qualification and other condition, through the said notification the same can be filled through promotion but malafidely the said posts were advertised in order to adjust their blue eyed and petitionets are intent to make an escape goat, so that the petitioners in future cannot knock the doors of court/tribunals for their justified rights. (Copy of Notification bated 18:04.2018 is ATTACHED AS ANNEXURE "G").

p3271 2019 Hayat khan va Govt full U6B 51 PG

That in the part, 11 vacant posts of Juniar Clerk were filled, but the petitioners were neglected.

10. That as per seniority List of the department the petitioners are on top of qualification and are eligible/fit for promotion, but even then petitioners were neglected, despite the fact that C.O.C against The respondents is pending before this Honourable Court and in that very C.O.C, notice was issued and reply submitted. It is worth mentioning to note here that the said advertisement is made when the respondents failed in their first attempt of floating the Judgment of this Honourable Court, because Field Watcher was

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added in the sen ority list and the rules and commitment were violated by the respondents but this Honourable Court was pleased enough to came for the protection of the rights of the petitioners and issued notice to them in the C.O.C then the second drama of fresh appointment is staged. (Corres of Disputed MERIT LIST,

C.O.C AND ITS REPLY ALONGWITH SENIORITY LIST ARE ATTACHED AS

wp3271 2019 Hayal-khán va Govt full USB 51 PG

ATTESTED

That feeling aggrieved from the acts of the respondents, the petitioner shaving no other alternate efficacious remedy, approach this Hon ble Court for redressal of their grievances, on the following grounds inter-alia:

### <u>GROUNDS:</u>

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That the act of the respondents of not promoting the petitioners is illegal, unlawful, without lawful authority and thus of no egal effect, hence needs interference of this Hon'ble Court.

B. That the act of the respondents is the violation of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973, and all persons should be treated equally accordance with law, because the said rules had already adopted by the other wings of the Agriculture Department and dozens of employees were promoted under the said quota of promotion.

C. That the policy of promotion is not adopted in Soli Conservation Wing; thus the act of the respondents is

p3271 2019 Hayst-khan va Govt full USB 51 PC

ATTESTE

violation of already existing rules of the department for a

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D. That the act of the respondents violated the Article 4 of the Constitution of Islamic Republic of Pakistan, 1973, and all persons exercising the authority must do only in accordance with law.

E. That the petitioners are well qualified and most senior as per qualification in the senjority list prepared by the to respondents department, therefore eligible for promotion as Junior Clerk.

F. That other employees were promoted as per existing quota, and promotion rules in Agricultural Department Soil Conservation Wing, thus it will amount to discrimination too if not promoted fhe petitioners.

That this Hon'ble Court has got ample jurisdiction to entertain and disposed of the instant Writ Petition.

vp3271 2019 Hayal-khan vs Govt full USB 51 PG

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according to the facts and elicumstances of the case

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That any other ground or reasons if not me ioned at the time of hearing will be argued with the pointsion of this Hon'ble Court.

It is, therefore; most humbly prayed, that on acceptance of the instant Writ Petition, the advertisement dated 30th & 31st May, 2019 published in daily AAJ and Mashriq and if in any other newspaper, to the extent of Junior Clerk may kindly be declared as lllegal, void-ab-initio, ineffective upon the rights of the petitioners and in violation of judgment of this Honourable Court and is based on malafide; as per the rules the respondents are bound to fill in the promotion quota earlier than initial fresh induction.

Any other relief, if not specifically prayed, my also graciously be granted; if appears just, necessary and appropriate.

a Govt-full USB 5t PG

ATTES

#### INTERIM RELIEF:

Bay way of Interim relief, the respondents may graciously be directed to stop the proceedings of recruitment to the extent of Junior Clerk (BPS-11), till the final decision of the Writ Petition.

> Petitioners Through

Dated: 15.06.2019

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CERTIFICATE

SHAH FAISAL ILYAS Advocate High Court, Peshawar

ADVOC

ADVOCATE

Join A

As per instruction of my client, it is certified that no such like. Writ Petition has early been filed by the petitioners in this Hon ble Court.

### LIST OF BOOKS:

ATTESTEL

1. Constitution of Islamic Republic of Pakistan, 1973.

2. Any other law books according to need.

BE THUE S CRIMIFIED

Authorising Under Article 87 65 the danuty of analysis 199 2 2 AUT 2019

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ATTESTED

# PESHAWAR HIGH COURT, PESHAWAR

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••	. 181					Sinnatiire	

19.08.2019 ... W.P.No. 3271-P/2019.

Date of Order of

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Proceedings

Present: Mr. Shah Falsal Ilyas, Advocate, for the petitioners.

Mr. Muhammad Sohali, AAG alongwith Naveed Hashim, Soll Conservation Officer.

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بواقع عد

LAL JAN KHATTAK, J.- Petitioners through the Instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 have prayed this court for issuance of a writ declaring the advertisement dated 30<sup>th</sup> & 31<sup>s</sup> May, 2019 to the extent of appointments of the Junior Clerks as lilegal and ineffective upon their rights.

2. At the very outset, learned counsel for the petitioners, while placing reliance on the judgment of this court dated 08.11.2018 delivered in W.P.No. 946-A/2017, submitted at the bar that the petitioners would be satisfied if directions are issued to the respondents to consider them for promotion to the posts of Junior Clerks against the 33% quota reserved for Class-IV employees as per rules, to which the learned AAG has readily agreed.

3. In view of the above, this petition stands disposed of with direction to the respondents to fully observe and implement the promotion policy of \$3% quota, reserved for Class-IV employees, in letter and spirit.

JÜDG Houth TRUE CO 2 2 AUG 2019

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PESHAWAR HIGH COURT. PESHAWAR ORDER SHEET Date of Order of Order or other Proceedings w Proceedings 1 2 11.07.2019 W.P.No.3271-P/2019. Present: Mr.Shah Faisal Ilyas, Advocate for the petitioners. Comments of respondents No.1, and 2 be called for so as to reach this Court within a fortnight. Interim Relief. Notice. In view of the judgment dated 08.11 2018 in W.P.No.946-A/2017 whereby 33% quota for promotion to the posts of Junior. Clerks has been reserved for the Naib Qasids thereby the proceedings to the extent of recruitment of the Junior Clerks (BPS-11) on the basis of advertised posts shall be withheld. JUDGE Date of Presentation ( %) No of Page - تدسم ال Copying JUDG Total Date of Preparation of L TIFIED T Date of Delivery of copy Received By Hon'ble Mr.Justice Mohammad Ibrahim Khan, Jadge. Hon'ble Mr.Justica Abdal Shakaor, Judge. <u>F.Jan /\*</u> (DB)

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6. 7.	A second lager reference	MARGAND OF LEFERING	CII XII EF ADA MATA CHAILINA LA
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The competent authority reserves the right to cancel/postpone recruitment process at any stage or increase antidecrease the number of posts. Last date of submission of Application Form is 15 days from the date of publication of this

advertisement. In case of appointment the candidate must sen 10.

ve at least two years at his first appointing station? P.O.BOX NO. 1497 PESHAWAR UNIVERSITY

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# BEFORE THE HONOURABLE PESHAWAR HIGH COURT.

PESHAWAR

C.O.C. No.\_\_\_\_/2020 In C.O.C. No.200-P/2019 In W.P.No.96-P/2018

1. Hayat Khan, Naib Qasid BPS-3, Soil Conservation Agricultural Department Mardan, Khyber Pakhtunkhwa.

2. Muhammad Abbas Naib Qasid BPS-3 Soil Conservation Agricultural Department Haripur, Khyber Pakhtunkhwa.

.....PETITIONERS

#### VERSUS

1. Mr. Israr Khan, Secretary Agriculture, Civil Secretariat, Peshawar.

Mr. Yaseen Khan, Director General, Agriculture (Soil & Water Conservation), Khyber Pakhtunkhwa, Peshawar.
 ......Respondents/Contemnors

APPLICATION UNDER ARTICLE 204 OF THE CONSTITUTION R/W S. 3, 4, 5 OF THE CONTEMPT OF COURT ORDINANCE 2003 WITH ALL ENABLING PROVISIONS FOR INITIATING CONTEMPT OF COURT

Adv\Havai Kh

C.O.C 2020 4/

PROCEEDING AGAINST THE RESPONDENTS/ CONTEMNORS AS AS FOR WELL, THE OF THE IMPLEMENTATION ORDER/ JUDGMENT DATED 20.11.2019 OF THIS HON'BLE COURT PASSED IN C.O.C NO.200-P/ 2019 AND ORDER/ JUDGMENT DATED 18.12.2018 IN WRIT PETITION NO.96-P/2018.

#### **Respectfully Sheweth**

 That the petitioner No.1 had earlier filed a Writ Petition No.96-P/2018 for the redressal of his grievance against the respondents, which was disposed of on 18.12.2018
 in his favour. (COPIES OF WRIT PETITION AND ORDER/ JUDGMENT DATED 18.12.2018 ARE ATTACHED AS ANNEXURE "A" & "B" RESPECTIVELY).

2. That likewise petitioner No.2 also moved Writ Petition No.946/2017 before this Honourable Court Abbottabad
Bench for the same relief, which was disposed of in petitioner's favour, vide order/ judgment dated
08.11.2018. (COPIES OF WRIT PETITION AND ORDER/ JUDGMENT DATED 08.11.2018 ARE ATTACHED AS ANNEXURE "C" & "D" RESPECTIVELY).

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# HITORE THE FONOURABLE PESHAWAR HIGH COURT.

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C.O.C. No\_\_\_\_/2020 In C.O.C. No.200-7/2019 In W.P.No.96-P/2018

Heyat Khan & another. . . . . . . . . . . . . . . . PETITIONERS

VERSUS

Mr. I. rar Khan & another, .... REBFOIDEN-CONTEMNORS

# ADDRESSES OF THE PARTIES

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≤ **}** 

- 1. Hayat Khan, Naib Qasid BPS-3, Soil Conservation Agricultural Department Mardan, Knyber Pakhtunkhwa.
- 2. Muhammad Abbas Naib Qaeid BPS-3 Soil Conservation Agricultural Department Haripur, Klyber Polchtunkhwa.

# RESPONDENTS:

- 1. Mr. Israr Khan, Secretary Agriculture, Civil Secretariat, Peahawar.
- 2. Mr. Yaseen Khan, Director General, Agriculture (Soil & Weter Conservation), Khyber Pakhtunkhwa, Pezhawar.

Petitioners

Through " The

Dated: 02.03.2020

Shah Faisal Ilyaa Advocate High Court, Peshawar.

PESHAWAR HIGH COURT, PESHAWAR.

#### FORM 'A' FORM OF ORDER SHEET

Order or other proceedings with the order of Judge Date of order. 18.03.2020 COC No.177-P/2020 in COC No.200-P/2019 in WP No.96-P/2018 Present:- Mr. Shah Faisal Ilyas, Advocate, for the petitioners. Mr. Mujahid Ali Khan, AAG for the respondents along with respondent No.2. \*\*\*\* ROOH-UL-AMIN KHAN, J .- Petitioners, who are serving as Naib Qasid/Class-IV, in the respondents' filed a Writ Petition No.96-P/2018, seeking issuance of the following writ:-"On acceptance of the instant writ petition, the respondents may graciously be directed to promote them as Junior Clerk from the post of Naib Qasid, as per existing Rules of Promotion. Any other relief, if not specifically prayed, may

also graciously be granted, if appears just, necessary and appropriate".

2. The writ petition (supra) was decided vide order/judgment dated 18.12.2018, in the following terms:-

> "When the case was taken up for hearing, learned AAG stated at the bar that Rules in this regards has been framed, but, at the moment seniority list has not been prepared for the purpose. Further deposed that matter is in pipeline, though as and when completed, the petitioners will be considered for promotion to

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DB of Hon'ble Mr. Justice Rook al Amin Khan and Hon'ble Mr. Justice S.M.Attique Sh

PROCEEDING AGAINST THE RESPONDENTS/ **CONTEMNORS** AS WELL, AS FOR THE IMPLEMENTATION OF THE ORDER/ JUDGMENT DATED 20.11.2019 OF THIS HON'BLE COURT PASSED IN C.O.C NO.200-P/ <u>2019</u> AND ORDER/ JUDGMENT DATED 18.12.2018 IN WRIT PETITION NO.96-P/2018.

## **Respectfully Sheweth**

1

- That the petitioner No.1 had earlier filed a Writ Petition No.96-P/2018 for the redressal of his grievance against the respondents, which was disposed of on 18.12.2018 in his favour. (COPIES OF WRIT PETITION AND ORDER/ JUDGMENT DATED 18.12.2018 ARE ATTACHED AS ANNEXURE "A" & "B" RESPECTIVELY).
- 2. That likewise petitioner No.2 also moved Writ Petition No.946/2017 before this Honourable Court Abbottabad Bench for the same relief, which was disposed of in petitioner's favour, vide order/ judgment dated 08.11.2018. (Copies of WRIT PETITION AND ORDER/ JUDGMENT DATED 08.11.2018 ARE ATTACHED AS ANNEXURE "C" & "D" RESPECTIVELY).

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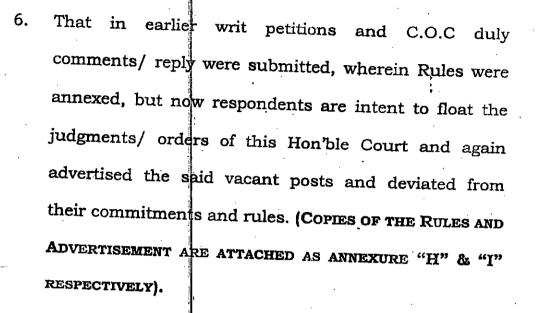
3. That petitioners approached the respondent's through an application for their promotion in the light of order/ judgment dated 18.12.2018 passed by this Hon'ble Court (Principal Seat) and order/ judgment dated 08.11.2018 (Abbottabad Bench), which was processed by the office. (Copy of Application Alongwith Covering Letter is Attached As Annexure "E").

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- 4. That the petitioners then filed a C.O.C. No.200-P/2019 against the respondents, which was disposed of by this Honourable Court vide order/ judgment dated 20.11.2019. (Copy of THE COC AND ORDER/ JUDGMENT DATED 20.11.2019 IS ATTACHED AS ANNEXURE "F").
- 5. That the respondents again floated the orders/ judgments of this Honourable Court and advertised the said posts by depriving the petitioners from their due promotion, thus the same was again challenged before this Hon'ble Court and again commitment was made, therefore, writ petition was disposed off. (Copy of THE WRIT PETITION AND JUDGMENT DATED 19.08.2019 IS ATTACHED AS ANNEXURE "G").

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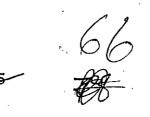


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- 7. That the respondents are badly failed to implement the orders/ judgments of this Honourable Court and prolonging the matter.
- 8. That on 01.03.2019, four persons were promoted from Junior Clerk to Senior Clerk and now four seats are vacant upon which the petitioners, if the respondents/contemnors follow the rules, can be considered. (COPY OF THE NOTIFICATION FOR PROMOTION IS ATTACHED AS ANNEXURE "J").

9. That the act of the respondents against their own commitment/ the Rules on the subject and natural justice as well as the orders/ judgments of this Hon'ble Court.

l Ilyas Adv\llayat Khan C.O.C 2020.de



- 10. That the act of the contemnors is totally in disregard of judgment and contemnors are intent to flout the orders/ judgments of this Honourable Court for their ulterior motives, thus this Honourable Court needs to interfere in the matter.
- 11. That non-compliance of the aforesaid orders/ judgments of the Honourable Court by the contemnors/ respondents is illegal, without lawful authority, without jurisdiction, malafide and void abinitio.
- 12. That every government functionary is under legal obligation to honour the judgment of the Court of competent jurisdiction, the contemnors/ respondents by not complying with the orders/ judgments, have not performed their duty in accordance with law.
- 13. That non-compliance of the orders/ judgments of the Honourable Court, speaks of malafide on the part of contemnors/ respondents and to lower the position of the judiciary in the eye of public at large.

Faizan DATA\Shah Faisal firms Adul Hanny Man Comment

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14. That from the facts, mentioned above, it has become crystal clear that the respondents have committed contempt of court.

It is, therefore most humbly prayed on acceptance of this application/ petition, the Contempt of Court proceeding may please be initiated against the respondents and they may strictly be directed to implement the orders/judgments of this Hon'ble Court dated 08.11.2018, 18.12.2018, 19.08.2019 & 20.11.2019 in the best interest of justice.

Through

Dated: 02.03.2020

**Shah Faisal Ilyas** Advocate High Court, Peshawar,

Petitioners

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PESHAWAR

C.O.C. No.\_\_\_\_/2020 In C.O.C. No.200-P/2019 In W.P.No.96-P/2018

Hayat Khan & another .

#### VERSUS

Mr. Israr Khan & another. ..... RESPONDENTS/CONTEMNORS

## AFFIDAVIT

I, Hayat Khan, Naib Qasid (BPS-3), Soil Conservation Agricultural Department Mardan, Khyber Pakhtunkhwa (Petitioner No.1), do hereby solemnly affirm and declare on oath that the contents of the accompanying **C.O.C**, Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

PETITIONERS

Identified By:

D E P O N E N T CNIC: 16101-9527502-1 Cell: 0333-9193497

No: 24001 Certified that the above anhanniv affirmation betw day of MAY sio N/QMid TOLN 18 trise sh4/h .... who was ida 💴 Who is personal? MITESTER

Shah Faisal Ilyas Advocate High Court, Peshawar.

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## BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

C.O.C. No.\_\_\_/2020 In C.O.C. No.200-P/2019 In W.P.No.96-P/2018

Hayat Khan & another

. PETITIONERS

#### VERSUS .

Mr. Israr Khan & another. .... Respondents/Contemnors

## ADDRESSES OF THE PARTIES

### <u>PETITIONERS:</u>

- 1. Hayat Khan, Naib Qasid BPS-3, Soil Conservation Agricultural Department Mardan, Khyber Pakhtunkhwa.
- 2. Muhammad Abbas Naib Qasid BPS-3 Soil Conservation Agricultural Department Haripur, Khyber Pakhtunkhwa.

### <u>RESPONDENTS:</u>

- 1. Mr. Israr Khan, Secretary Agriculture, Civil Secretariat, Peshawar.
- 2. Mr. Yaseen Khan, Director General, Agriculture (Soil & Water Conservation), Khyber Pakhtunkhwa, Peshawar.

### Through

# Petitioners

Shah Faisal Ilyas Advocate High Court, Peshawar.

ATTES

Dated: 02.03.2020

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PESHAWAR HIGH COURT, PESHAWAR.

#### FORM 'A' FORM OF ORDER SHEET

18.03.2020 COC

Date of order.

#### <u>COC No.177-P/2020 in COC No.200-P/2019</u> in WP No.96-P/2018

Order or other proceedings with the order of Judge

<u>Present:</u>- Mr. Shah Faisal Ilyas, Advocate, for the petitioners.

Mr. Mujahid Ali Khan, AAG for the respondents along with respondent No.2.

\*\*\*\*\* <u>ROOH-UL-AMIN KHAN, J.-</u> Petitioners, who are serving as Naib Qasid/Class-IV, in the respondents' filed a Writ Petition No.96-P/2018, seeking issuance of the following writ:-

> "On acceptance of the instant writ petition, the respondents may graciously be directed to promote them as Junior Clerk from the post of Naib Qasid, as per existing Rules of Promotion. Any other relief, if not specifically prayed, may also graciously be granted, if appears just, necessary and appropriate".

2. The writ petition (supra) was decided vide order/judgment dated 18.12.2018, in the following terms:-

"When the case was taken up for hearing, learned AAG stated at the bar that Rules in this regards has been framed, but, at the moment seniority list has not been prepared for the purpose. Further deposed that matter is in pipeline, though as and when completed, the petitioners will be considered for promotion to

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DB of Hos'ble Mr. Justice Rook al Amin Khan and Hon'his Mr. Justice S.M. Attique Shi

the post of Junior Clerk, subject to availability of post. Learned counsel for the petitioners when confronted with the situation, he also solicited the same".

3. Alleging contempt on the part of respondents to implement the judgment *(ibid)*, the petitioners, filed COC No.200-P/2019 before this Court, which was decided vide order 20.11.2019, in the following manner:-

> "The latter stated at the bar that petitioners would be considered along with other candidates for promotion against the post of Junior Clerk within a period of four months. ) In view of the above, this petition stands disposed of with direction to the respondents to live up to their commitment so made, before this Court and consider the petitioner along with others for the desired promotion with the above period."

4. Alleging refusal on the part of respondents to implement the aforesaid judgment/Order, the petitioners have filed the instant COC petition.

5. Having heard learned counsel for the parties, it appears from record that petitioners are civil servants and the controversy agitated by them in the writ petition pertains to promotion. Under Article 212 of the Constitution, this Court lacks the jurisdiction in the matter. Besides, no order has been passed by the respondents' department violative of the orders/judgments of this Court. Resultantly, this COC petition is disposed of accordingly, however, the

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DB of Hon'ble Mr. Justice Rook pl Amin Khan and Hon'ble Mr. Justice S.M.Attique Sha

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72 + 84 petitioners would be at liberty to approach the proper forum, against any action of the respondents, detrimental to their rights. JUDGE announced: 18.03,2020 futter JUDGE M.Simj Adridi PS 'ble Mi

ATTESTED

GOVE RNMENT OF KHYBER PAKHTUNKHWA ESTABUSHMENT DEPARTMENT (REGULATION:WING) INO SOR III(E&AD)1-2/2014 (Vol. XI) Dated Peshawar the August #, 2019

The Secretary to Governor Knyber Pakhtunkhwa Agriculture Department

S.U.PCI GUIDANCE/OPINION ON PROMOTION OF CLASS-IV (BS-03)

Jean Sa

1.0

1 am directed to refer to Agriculta e Department letter No:SOE (AD) v-5/2019/SC dated 19<sup>th</sup> July 2019 on the subject cited above and to state that he Service Rules of the Junior Clerk is quite clear i.e. Serial No. 18 column 3(ii) a spece of 30 words per minute in typing is required for initial recruitment of Junior stark, while in column-5 the said condition is not applicable for promotion.

2 It is therefore, advised that Agriculture Department may proceed unther in the malter in light of the Service Rules accordingly.

Yours Faithfully

(Khalil-ur-Rahman) SECTION OFFICER(R-III) Phone # 091-921 1793



بخدمت جناب سبکٹر ، ایگریکلچر سول سیکٹریٹ ما هب

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# درخوا ست بمراد حکم ترقی

جناب عالى ! مود ما ندگز ارش مد ب که: سائلان محكمه سوائيل كنز روييثن خيبر پختونخواه كمختلف اصلاطع ميں نائب قاصدا در چوكيداركي يوسنوں پر \_1 تعنیات ہیں۔سائلان محکمہ ہٰذامیں اپنے فرائض مصبی بہتر پلن طریقے سے انجام دے رہے ہیں اور سائلان كوتر قى نېيس مل رہى ہے۔

سائلان خیبر پختونخواہ کے سروس رونز کے مطابق کلاس فور (4) ملا زمین جالیس فیصد کو شدرجو نیرکلرک کو \_2 ترقی کی حقدار میں اور محکمہ میں اعلیٰ حکام نے سائلان کوتر تی دینے سے سریح انکار کیا ہے۔

- 3۔ سائلان حکومت خیبر پختونخواہ کنز رویشن نے کلال فور (4) ملاز مین کے ترتی کے لئے سروس رولز میں کوئی گنجائش نہیں رکھیتھی تو سائلان نے پہلے عدالت سے بھی رجوع کیا اور عدالت نے سائلان کے ق میں فیصلہ بھی دیا۔ محکمہ ہذانے عدالتی فیصلوں کی وجہ سے سروس رولز میں تینتیس (33) فیصد کو ٹہ بھی سائلان کیلیے مختص کیا۔
- ۔ اپریل 2018 کوسروس دولز میں تبدیلی کے بعد آج تک ایک بھی کلاس فور (4) ملازم کوجو نیئر کلرک کی آسامی پرتر قی نہیں دی گئی۔دستیاب معلومات کے مطابق محکمہ میں جو نیئر کلرک کی کل آسامی 37 ہیں جس کا33 فیصد 12 اسامیاں بنتے ہیں۔

ستمبر 2019 کودوبارہ سروس رولز میں تبدیلی کی گئی ااور فیلڈوا چرکوبھی جونیئر کلرک کے آسامی پرترتی



75 86 کو شمي شامل کيا گيا حالانکه فيلدواچر، فيلد شاف کا حصب اور إس کواي بي بن ريد مي سرتي ملي چاہئے نہ کہ دفتری امور کے اسامی بر۔ لہٰذا آپ صاحبان مہر بانی کر کے سائلان کے دادری کے لیے احکامات صا در فرماویں تا کہ تحکمہ اِن غريب اورلاحا رکلاس فور (4) ملاز مين کے قتلفی نه کريں اور سائلان کوتر تی ديکر مشکور فرما کيں عمر بھردعا ئىي دىتار ہو گے۔ المرقوم:13.03.2020 حيات خان نائب قاصد سائل كنزرويشن مردان شناختى كارد نمبر:1-16101-9527502 مويائل نمبر:9193497-0333 کابھی برائے: ) ۲) محترم جناب چیف *سکیٹری خیبر پخ*تونخواہ ۲) محترم جناب وزیراعلی صاحب خیبر پختونخواه ٣) محترم جناب سيكثري الطبيلشمنك صاحب خيبر پختونخواه البليان مطغى: حلفا بیان کرتا ہوں کہ جملہ مراتب درخواست درست وضح ہے۔ NOTARY ATTESTED

76 Rs. io. 439 For Insurance Notices see reverse, Stamps affixed except in case of 87 uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgen/ey/t is due. Date-Stamp Received a registered\* Nito flere "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary." addressed to Writo Initials of Receiving Officer (in words) Insured Joy Rs. Mpfigure Kilo eight ] If insured. Grams (in words) Insurance fee Rs. (Name and address of sender No. 440 Ps. Rs. For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due. Received a registered\* Duje-Stamp addressed to with the word, "insured" before it when necessary. Write here 'llettor', Officer Initials of R words) Instit Kilo Veig If insured (in words) Grams Insurance fee Rs Ps Name and ress øf sender ATTESTET . .

DIRECTORATE GENERAL SOIL & WATER CONSERVATION KHYBER PAKHTUNKHWA Agriculture Services Academy (ASA) Campus, Opposite Islamia College, Jamrud Road, Peshawar. http://soilconservation.kp.gov.pk @deswicko@email.com © 091-9224331 1 091-5842912

No

Dated:



OFFICE ORDER

Consequent upon the recommendations' of the Departmental Promotion Committee in its meeting held on 26-02-2019 under the Chairmanship of Director General Soil & Water Conservation, Khyber Pakhtunkhwa, Peshawar, Mr. Zakir Hussain, Mr. Inyat Ullah Khan, Mr. Shaheen Shah and Mr. Aamir Khan, Junior Clerks (BS-11) of the Directorate General Soil & Water Conservation Khyber Pakhtunkhwa are hereby promoted to the post of Senior Clerk (BPS-14); the following posting / transfer/ adjustment are herby made with immediate effect in the interest of public service.

Sr. No.	Name of official		From	To.	Romarks.	
1.	Mr.Zakir Hussain	. Conservation, Batkhela, Offi	¢e	District Officer Soil & Water Conservation, Malakand at Batkhela, Office.	Vice Sr. No. 07	
12. 	Mr, Inyat Ullah Khan,	District Office Conservation R	Karak, Office.	District Officer Soll & Water Conservation Karak, Office.	Already working in his own pay	
3. 	Mr. Shaheen Shah		Dir Lower, Office.	District Officer Soil & Water Conservation Swat, Office.	Against the	
4. ·5. ·	Mr. Aamir Khan	Conservation N		Directorate General Soll and Water Conservation Khyber	Against the	
	Mr. Sabaz All Khan Senior Clerk (BS-14) Mr. Naveed Akhtar	Conservation D	Soil and Water ir Upper, Office.	Pakhtunkhwa, Peshawar, District Officer Soil and Water Conservation Dir Lower, Office,	Vacant post. Vice Sr. No. 06	
7.	Scalor Clerk (BS-14) Mr. Wisal Khan	Conservation D	Soil and Water ir Lower, Office.	District Officer Soll and Water Conservation Tor Ghar, Office.	Against the vacant post.	
· · ·	Senior Clerk (BS-14)	District Officer Conscrvation, M Batkhela, Office	lalakand et	District Officer Soil and Water Conservation Dir Upper, Office.	Vice Sr. No. 05	

Sd/-(Z. A. Khattak)

Director General Soll & Water Conservation

Khyber Pakhtunkhwa, Peshawar. 02

2019

Endst. No. 21:10

4.

Copy forwarded to:-

ł. 2.

The District Accounts Officers Karak, Dir Upper, Dir Lower, Mardan, Torghar and Swat. The Agency Accounts Officer, Malakand at Batkhela,

DGSWC, Dated at Peshawar, the

3.

The District Officers Soil and Water Conservation Karak, Dir Upper, Dir Lower, Mardan, Malakand at Batkhela, Torghar and Swat.

Officials concerned, for information and necessary action, please.

Director General Soil'& Water Conservation Khyber Pakhtunkhwa, Peshawar ATTE

la for				
1	n'rro	DE TUE DE	:รษ/	WAR HIGH COURT, PESHAWAR
	BEFU	<u>RE INE PE</u>	311/	
				SUD /2020
	Mr Bila	Ahmad, Soil	Cons	ervation Assistant (BPS-17),
	O/O th	e Director Ger	ieral I	Boll & Water Conservation
	Khyber	Pakhtunkhwa	, Pes	awar.
•		***********		Mar No.
				VERSUS
	1- T	he Governm	ent	of Khyber Pakhtunkhwa through Chief
. •				
	2- 7	The Secretary	/ ESY	BDIIstiment Department ette
				a, Peshawar. Ince Department, Civil Secretariat, Khyber
	4	Pakhtunkhwa,	live	Stock & Co-Operative Department, Khyber
• ·			Deebi	
	5-	The Director	Gene	al Soil & Water Conservation Departmency
•		Khyber Pakhtu	Inkhv	a, Peshawar. RESPONDENTS
				R SECTION-4 OF THE KHYBER
		APPEAL U	NDE	SERVICE TRIBUNAL ACT, 1974
		ACATRICT T	ГНЕ 🖁	TMPUGNED NOTIFICATION DATES
		10 0 7010 V	NHER	FRY THE 100% PROMOTION QUOTA
·		DECEDVED	FOR	THE CADRE OF THE APPELLANT MAS
		REEN REDI	CED	TO 75% AND AS SUCH THE REST OF
	• .	25% HAS E	EEN	ALLOCATED TO THE CADRE OF FIELD
Fledt	o-dav	ASSISTANT	AND	AGAINST NO ACTION TAKEN ON THE APPEAL OF APPELLANT WITHIN THE
1 and		DEPARIMEN	VIAL	TOD OF NINETY DAYS
Begis	24 212	STATUTORI	<u></u>	
2-2-1012	O PRA'	YER:		
	·	That on a	ccep	tance of this appeal the impugned
		Notification	date	ed 18.9.2019 may kindly be declared as
ATTES	STED	Ultra Vires	, ille	egal, unconstitutional and ineffective of the appellant. That the respondents
X	~/	may kindly	ho di	irected to restored the 100% promotion
	KER	guata of th	e ani	heliant to the posts of Deputy Directors
Khybert		Soil Conse	rvatio	on, Detaty Director Planning, Deputy
Service T Pesha		Director 9	Soil I	Survey and District Officers 30h
		C iservatio	on (B	BPS-18) and as such the appellant may
1		k⊨∴dly be c	onsiù	dered for promotion to the higher scale other remedy which this august Tribunal
		$0 \leftarrow PS-18.$	ANY ( that	may also be awarded in favour of the
		appellant.		

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ATTESTED

n.06.2020

Counsel for the appellant present.

Whether the judgment of August Supreme Court of taikistar, reported as 2015-SCMR-269 is applicable to the facts and circumstances contained in the instant appeal, more-so, when the amendment in service rules dated 18.0.2019 prima-facle appears to affect. The terms and conditions of service of appellant, is a question which requires to be resolved in the appeal in hand.

The appeal is therefore, 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 for submission of written reply/comments on 25.06.2020 before S.B.

Alongwith the appeal there is an application for restraining the respondents from acting upon the impugned notification clated 18.09.2(19. It is stated at the bar that a meeting of Provincial Selection Board is scheduled in the instant week. Notice of application be also given to the respondents for the date fixed. In the meanwhile, promotions to the post of Deputy Director Spil Conservation, Deputy Directors Planning, Deputy Director Soil Survey and District Officer Soil Conservation from amongst the Field Assistant (BPS-09) shall not be finalized.

Chairman

titied to patture copy. inkhu Tribuos(, Peshawar

Date of Pressent Number 67137 Copylary 7588 Urgonia Total Name of Concernations of Concerna

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لحد الت جنب مسرم م يبنعك ليك در <u>عرعيان بنام حومت وترو</u> موزخه مقدمته دعوك جرم: باعث تحريراً نكه مقدمه مندرجه عنوان بالامين ابني طرف سے داسطے بيردي دجواب دہي دکل کاردائي متعلقہ أن مقام مسروس تكريبيوك مي في الما من المال المال مقرركر بحاقراركياجا تابيج بركهصا حب موصوف كومقدمه ككل كاردائي كاكال اختيارة وكاير نيز وسیل صاحب کوراصنی نامه کرنے وتقرر رثالت ہ فیصلہ برحلف دیہتے جواب دہی اورا قبال دعوی اور بعسورت ذحرى كريية اجراءا درصولى چيك درويسة ارعرضي دعوى اور درخواست ہرتشم كى تصديق - زرای بردستخط کران کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کیطرفہ یا اپیل کی برایدگی ادر منسوخی نیز دائر کرنے اپیل نگرانی دنظر ثانی د پیروی کرنے کا اختیار ہوگا۔از بصورت ضرورت مقد مہ مذکور کے کل پاجز دی کاروائی کے داسط اور دلیل پا مختار قانونی کواپیے ہمراہ پااپنے بجائے تقرر کا اختیار ہوگا۔اورمیا حب مقرر شدہ کوبھی وہی جہلہ ندکور، بااختیا رات حاصل ہوں کے اوراس کا ساختہ یر داختہ منظور قبول ہوگا۔ دوران مقدمہ میں جوخ چہ دہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔ کوئی تاریخ بیشی مقام دورہ پرہویا حد ۔۔ باہر ہوتو دکیل صاحب پابند ہوں ہے۔ کہ بیر دی مدکورکریں۔لہذا وکالت نامہ کھدیا کہ سندر ہے،۔ المرقوم \_\_\_\_\_ ,20**20 6** ob Allotal Accepted

Before The Worthy Service Tribunel KP Pethower Mahammad Abbat VS Fort of KP Cothers Salset Application of Extension of time for Submitting Security Respected Sir, The above titled Service Appeal Admitted on previous date and Repondents were directed to submit written Comments but at The Same time Allelant way directed to fubmitt process bee, which was madvestently not fubmitted due to lack of knowledge It is Therefore most hundly requested that The time may gracionsly be Estended & So That The process fee is submitted Appelant Dated 21-9-2020 Theref Faire Coursel



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

#### Appeal No. 6338/2020

Muhammad Abbas, Naib Qasid (BPS-03) Soil & Water Conservation Haripur.....

Appellant

#### Versus

- 1. Government of Khyber Pakhtunkhwa through Secretary Agriculture.
- 2. Director General Soil and Water conservation Khyber Pakhtunkhwa, Peshawar
- 3. Director Soil & Water Conservation Haripur.

#### RESPONDENTS

#### **REPLY ON BEHALF OF RESPONDENTS NO. 1,2 & 3**

#### Respectfully Sheweth,

#### PRELIMINARY OBJECTIONS

- 1. That the appellant has no cause of action/ locus standi to file the instant appeal.
- 2. That the appellant has concealed the material facts from this Honorable Tribunal hence is liable to be dismissed on this sore.
- 3. That the appellant has stopped to agitate the instant matter before this Honorable Tribunal.

4. That this Honorable Tribunal has no jurisdiction to entertain the instant appeal.

#### **ON FACTS**

- Correct to the extent that the appellant was appointed as Naib Qasid (BPS-03) on 06-04-1993 in Soil and Water Conservation Directorate of Agriculture Department.
- Correct to the extent that the service rules for the promotion of Naib Qasid to the post of Junior Clerk were framed on 18-09-2019. (Annex-I)
- Correct to the extent that the appellant has filed writ petition no. 946-A/2017 in Peshawar High Court Peshawar Abbottabad Bench which was disposed off with the directions to the respondents to fully observe 33% quota (Annex-II). Hence the appellant will be promoted on his turn and on merit.
- 4. Not agreed as the COC was disposed off on the basis of merit with the directions to consider the petitioners along with others for the desired promotion within the period.
- 5. Not agreed as the position of Junior Clerk were advertised against initial quota as the service rules for promotion of Class-IV were framed on 18-09-2019 and the same were not applicable at that time resultantly the writ petition no. 3271-P/2019 was disposed of on merit.

6 The appellant is misleading this Honorable Tribunal as COC in the writ petition no 96-P/2018 is disposed of on merit.

- 7. Incorrect and not agreed the appellant is misleading this Honorable Tribunal by submitting incorrect/wrong facts and rules of Research, Extention, Engineering, On Farm Water Management Directorate which are not applicable to Soil and Water Conservation Directorate being separate attached formation of Agriculture Department.
- 8. Correct to the extent that the appellant has submitted his appeal on 13-03-2020 which was turned down being not matured and devoid of merits.

#### **GROUNDS:**

- A. No malafide intention is involved as 03 number of Class-IV have been promoted on 21-10-2020 (Annex-III) as Junior Clerk on the basis of newly framed service rules of the Directorate by implementing 33% quota. Moreover the appellant will also be promoted on the basis of their seniority and on their turn, purely on merit basis.
- B. The appellant has always been treated as per rules.
- C. As mentioned in ground (A) above.
- D. That the promotion is always based on seniority cum-fitness wherein the performance of the candidates also examined.
- E. Incorrect amendment to the existing service rules are made for promotion purely as per the policy/rules of the Provincial Government.
- F. As already explained in (B) above.

G. Pertain to the record.

- H. The appellant has always been treated as per rules and law of Provincial Government.
- I. No such order has been issued.
- J. Not agreed as only Class-IV employees of this department were included in the amendment.
- K. No comments, pertain to the record of Irrigation Department.
- L. 33% quota for promotion is already reserved as per service rules of the Directorate and the appellant will be promoted on his turn (Annex-IV) as the post of Junior Clerk which comes in the share of promotion quota, will be filled through promotion. Therefore the appellant may be directed to wait for his turn to be promoted as Junior Clerk.
- M. Incorrect as the service rules for the post of Junior Clerk are still in field and not suspended as yet.
- N. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is therefore humble prayed that the instant appeal having no lawful grounds may graciously be dismissed with cost along with directions to the appellant to wait for their turn in promotion on the basis of seniority cum-fitness as per rules.

(Respondent No.2)

18/2

Director General Soil and Water Conservation. Khyber Pakhtunkhwa, Peshawar

Agriculture Livestock and Cooperative Department, Government of Khyber Pakhtunkhwa, Peshawar.

(Respondent No.1)

(Respondent No.3) **District Officer** Soil & Water Conservation

Haripur

### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

#### Appeal No. 6338/2020

Muhammad Abbas, Naib Qasid (BPS-03) Soil & Water Conservation Haripur.....

Appellant

#### Versus

- 4. Government of Khyber Pakhtunkhwa through Secretary Agriculture.
- 5. Director General Soil and Water conservation Khyber Pakhtunkhawa, Peshawar
- 6. Director Soil & Water Conservation Haripur.

**RESPONDENTS** 

#### Affidavit

I do hereby solemnly affirm and declare that contents of above written reply are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable Tribunal.

Director General

Soil and Water Conservation Khyber Pakhtunkhwa, Peshawar.

# 194

#### GOVERNMENT OF THE KHYBER PAKHTUNKHWA Agriculture Livestock and Cooperation Department

#### **NOTIFICATION**

#### Peshawar, dated the 18/09/ 2019

<u>No. SOE(AD)II(2)429/2019/SC.</u> In pursuance of the provisions contained in sub-rules(2) of rule 3 of the Kbyber Rakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Agriculture, Livestock & Cooperation Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SOE(AD)II(2)429/2015-16/SC, Dated: 18<sup>th</sup> April, 2018, the following amendments shall be made, samely:

#### **AMENDMENTS**

in the Appendix.

APR

- (a) in PART-I, under the heading PROFESSIONAL STAFF, -
  - (i) for the existing entries, against Serial No. 03, the following shall be substituted in the respective columns, namely:

i	· 2	3	4	5
	"Deputy Directors Soil Conservation, Deputy Directors (Planning), Deputy Director (Monitoring), Deputy Directors Soil Survey, District Officers Soil Conservation.	-	-	<ul> <li>5</li> <li>(a) Seventy-five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Soil Conservation Assistants, Soil Conservation Assistants (Technical). Soil Conservation Officers, Soil Survey Research Officers and Assistant Soil Survey Research Officers having at least Second Class Master's Degree in Agriculture (Soil Sciences): or at least Second Class Bachelor's Degree (Hons) in Agriculture with (Soil Sciences) from a recognized Úniversity with five years service as such; and</li> </ul>
		[		

- (b) twenty-five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Soil Conservation Assistants, having at least Second Class Bachelor's Degree from a recognized University with twenty-five years total service as Field Assistant and above.
- Note: For the purpose of promotion, a joint seniority list of the Soil Conservation Assistants, Soil Conservation Assistants (Technical), Soil Conservation Officers, Soil Survey Research Officers and Assistant Soil Survey Research Officers, shall be maintained."; and

against Scrial No. 4, in Column No. 2, for the words "Assistant Director (Planning (ii)Supervisory)", the words "Soil Conservation Officer" shall be substituted; and

in PART-II, under the heading MINISTERIAL STAFF, -

(i)

:15.

against Serial No. 12, in Column No. 5, for the existing entries, the following shall be substituted, namely:

"By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographer with at least five years service as such or twelve years total service as Junior Clerk, Senior Clerk and Assistant.

Note: For the purpose of promotion, a joint seniority list of the Assistants and Senior Scale Stenographers to the post of Superintendent shall be maintained:

Provided that if the date of continuous officiating of an Assistant and Senior Scale Stenographer is the same, the Assistant shall rank senior to the Senior Scale Stenographer."; and

against Serial No. 18, in Column No. 5, for the existing entries, the following shall be substituted, namely:

> "(a) Thirty-three percent by promotion, on the basis of senioritycum-fitness, from amongst the Naib Qasids, Chowkidars, Field Watchers, Khalasis and Sweepers having Secondary School Certificate from a recognized Board with two years service as such; and

sixty seven percent by initial recruitment.". (b)

Sd/-

#### SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA AGRICULTURE, LIVESTOCK AND **COOPERATION DEPARTMENT.**

Endst. Of even No. & Date

- Copy forwarded for information and necessary action to: -
  - The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department.
- The Secretary to Govt. of Khyber Pakhtunkhwa Finance Department. 3.
  - The Secretary to Govt. of Khyber Pakhtunkhwa Law Department.
  - The Accountant General, Khyber Pakhtunkhwa, Peshawar.
  - The Director General, Soil & Water Conservation Wing of Agriculture Department, Khyber Pakhtunkhwa.
- The Secretary to Governor, Khyber Pakhtunkhwa. 6. 7.1
  - The PS to Secretary Establishment Department, Khyber Pakhtunkhwa.
- The PS to Minister for Agriculture, Khyber Pakhtunkhwa. 8. 9.

The Manager Govt. Printing Press, Khyber Pakhtunkhwa, Peshaw'ar. He is requested that printed (preferable gazette) copies of the notification as and when published may be furnished to this Department, E&A and Law Department along with details of gazette in which is published.

- P.S to Secretary Agriculture. 10.
- P.A to Deputy Secretary-Admn: Agriculture Department. 11.

12. Master file.

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sh/A. (SHAMS-UI **I**SLAM)

(ii)

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM OF ORDER SHEET

Case No.

Date of Order of . Proceedings	Order or other Proceedings with Signature of Judge (s)					
1	2					
08.11.2018	WP No. 946-A/2017.					
	Present. No. A					

Mr. Arshad Khan Tanoli, Advocate for petitioner. Mr. Yasir Zahoor Abbasi, Assist: AG with Imtiaz Muhammad Khan Divisional Assist: Director Food, Hazara, Abbottabad.

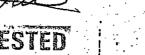
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LAL JAN KHATTAK, J. Through this petition, petitioner seeks his promotion as Junior Clerk against 33% quota reserved for class-IV employees.

2. Perusal of the record would reveal that vide notification dated: 18.04.2018, 33% quota for promotion to the posts of Junior Clerks has been reserved for the Naib Qasids, Chowkidars and Sweepers on the basis of seniority cum fitness. Learned AAG submitted at the bar that the prescribed quota will be fully observed in future on which learned counsel for petitioner did not press this petition anymore.

4. In view of the above, this petition stands disposed of with directions to the respondents to fully observe and implement the 33% quota in letter and spirit.

Table (P.S



ATTESTED

#### DIRECTORATE GENERAL SOIL & WATER CONSEL Agriculture Services Academy (ASA) Campus, Opposite

http://soilconservation.kp.gov.pk 🛛 🖾 🖉 dyser

### R PAKHTUNKHWA ud Road, Peshawar. 31 🛱 091-5842912

#### <u>" Save 🗄 </u>

#### OFFICE ORDER

Consequent upon the recommendations of the Departmental Promotion Committee in its meeting held on 20-10-2020 under the Chairmanship of the Director General Soil and Water Conservation, Khyber Pakhtunkhwa, Peshawar, the following Class-IV (BS-03) employees of the Directorate General Soil and Water Conservation Khyber Pakhtunkhwa are hereby promoted/ transferred/ adjusted against the vacant posts of Junior Clerk (BS-11) with immediate effect in the interest of public service, as per details below;

Sr. No.	Name of Official	From	То	Remarks.
1.	Muhammad Wali Shah	Office of the Director Soil and Water Conservation, Karak.	Office of the District Officer Soil and Water Conservation, Orakzai.	Against the vacant post of Junior Clerk
2.	Mr. Fazal Rahim Khan	Office of the District Officer Soil and Water Conservation, Nowshera.	Office of the District Officer Soil and Water Conservation, Nowshera.	Against the vacant post of Junior Clerk
3.	Mr. Latif ur Rehman	Office of the District Officer Soil and Water Conservation, Dir Upper.	Office of the District Officer Soil and Water Conservation, Chitral.	Against the vacant post of Junior Clerk

#### Sd/-(MUHAMMAD YASEEN KHAN) Director General Soil & Water Conservation Khyber Pakhtunkhwa

Peshawar.

Endst. No. 2064-76 /DGSWC,

Dated at Peshawar, the 2110/2020.

Copy forwarded to:-

- 1. The Section Officer (Establishment), Government of Khyber Pakhtunkhwa, Agriculture, Livestock and Cooperative Department, Peshawar.
- 2. The District Accounts Officers, Karak, Nowshera, Dir Upper, Orakzai and Chitral.
- 3. The Director Soil and Water Conservation, Karak.
- 4. The District Officer Soil and Water Conservation, Nowshera, Dir Upper, Orakzai and Chitral.
- 5. The Accountant of this office.
- 6. The Officials concerned.

for information and necessary action, please.

Allested DISTR OFFICER SOIL COMSERVATION NOWSHERA

Director General Soil & Water Conservation Khyber Pakhtunkhwa Peshawar. IN PURSUANCE OF SECTION-8(1) OF KHYBER PAKHTUNKHWA CIVIL SERV SERVANT (APPOINTMENT PROMOTION AND TRANSFER) RULES 1989 FINAL KHALASI AND SWEEPER) AS OF DIRECTORATE GENERAL SOIL AND WAT

FICATION

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#### AD WITH RULESE 17 OF KHYBER PAKHTUNKHWA CIVIL )F CLASS-IV (NAIB QASID, CHOWKIDAR FIELD WATCHER, )N KHYBER PAKHTUNKHWA AS IT STOOD ON 31-08-2020

NOTIFIED/CIRCULATED AS UNDER

S.No	Name	Designed			AS UNDER			-
1.		Designation	Qualification	CNIC No	Date of Birth	Home District.		Date of present
	Muhammad Wali Shah	Chowkidar	Metric	14203-7484300-7	18-07-1962	Karak	<b>appointment</b> 28-02-1981	<b>position</b> 28-02-1981
2.	Mehboob Rehman	Field Watcher	-	14203-7484300-7	15-01-1962	TZ 1		
3.	Bahram Khan	Field Watcher		15401-0709164-9	10-05-1961	Karak	26-06-1981	26-06-1981
4.	Wali Zoman	Field Watcher		14202-1351327-7	14-03-1961	Malakand	25-05-1983	25-05-1983
5.	Muhammad Zaman	Naib Qasid	NIL	17101-3828650-7	01-07-1965	Karak	09-08-1983	09-08-1983
6.	Mohad Saeed	Field Watcher	Illiterate	13504-2230212-9	01-07-1965	Charsadda	01-09-1983	31-01-2000
7:	Gul Raza	F/Watcher	-	12103-1475428-1	20-07-1963	Mansehra	12-05-1984	12-05-1984
8.	Khadim Hussain	Field Watcher	Middle	12105-1475420-1	21-12-1960	D.I.Khan	20-07-1986	22-09-2003
9.	Abdul Qayum	Chowkidar	-	12102-2139029-9	03-12-1960	Hangu	01-12-1986	01-12-1986
10.	Subhan Ali	Field Watcher	Under Matric	12102 2137029-9	17-01-1966	D.I.Khan	02-12-1986	02-10-2001
11.	Muhammad Ali	Chowkidar	Under Matric		01-07-1967	Lakki Marwat	05-05-1987	22-01-1994
12.	Fazal Rahim	Field Watcher	Matric	17201-8274024-5	15-11-1960	Lakki Marwat	05-05-1987	01-09-1997
13.	Mumtaz Khan	Naib Qasid	-	16102-2324720-9	13-04-1968	Nowshera	05-05-1987	01-10-1993
14.	Halim Jan	Naib Qasid	Under middle	15302-0910834-1	01-04-1968	Mardan	07-05-1987	07-05-1987
15.	Gul Sher	Field Watcher	-	17201-8554564-7	1966	Dir Lower	19=05-1987	01-12-1987
16.	Fazal Rabi	Field Watcher	-	15601-1001630-7	15-01-1967	Nowshera	21-05-1987	01-06-1987
17.	Rehman Said	Field Watcher	Middle	16101-7420975-9	05-04-1965	Swat	07-06-1987	07-06-1987
18.	Fazal shah	Field Watcher	Middle	16101-2317526-3	18-02-1962	Mardan	20-06-1987	30-10-1993
<u>19.</u> 20.	Latif ur Rehman	Field Watcher	Metric	15701-2282169-3	01-04-1968	Swabi	01-07-1987	01-07-1987
	Muhammad Israr	Chowkidar	-	14586030381		Dir Lower	01-12-1987	1-04-2014
21.	Sami Ullah	Field Watcher	F.A	15602-0262953-5	01-01-1968	Karak	06-12-1988	06-12-1988
22.	Inamullah	Field Watcher	Under Middle	15302-0202935-3		Swat	07-06-1990	07-06-1990
23.	Asal Din	Naib Qasid	Uner matric	15502-0505551-5	01-01-1967 1965	Dir Lower		01-12-1992
24.	Ismail Khan	Chowkidars	Under Matric			Lakki Marwat	05-07-1992	05-07-1992
25.	Tariq Mehmood	Field Watcher	Nil	13302-0379873-7	05-01-1973 02-10-1971	Lakki Marwat	28-09-1992	12-08-2005
26.	Noor Hussain Shah	Field Watcher	Illiterate	13503-0546537-3		Haripur		21-10-1992
	Inayatullah shah	Field Watcher	Matric	13301-1338460-5	03-03-1968		24-10-1992	24-10-1992
28.	Atta Ullah jan	Field Watcher	Matric	13301-0601500-1	14-02-1965	<b>YY</b> .		24-10-1992
				15501-0001500-1	30-10-1968	Haripur	24-10-1992	24-10-1992

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•	29.	Muhammad Sabir	Field Watcher	Metric	13101-0869987-9	08-05-1969	Abbottabad	26-10-1992	26-10-1992
ť	30.	Zakir Hussain	Field Watcher	Illiterate	13501-1296647-3	11-04-1966	Mansehra	21-12-1992	21-12-1992
	31.	Amir Khan	Field Watcher	Illiterate	13503-0603984-7	01-07-1961	Mansehra	26-01-1993	06-01-2005
	'32	Muhammad Abbas	Naib Qasid	Matric	13302-0494673-1	10-04-1968	Haripur	06-04-1993	06-04-1993
	33.	Abdul Rashid	Field Watcher	Illiterate	13503-8660787-7	01-07-1961	Mansehra	01-06-1993	01-06-1993
•	34.	Asmat Nawaz	Field Watcher	F.A	13301-1320470-5	01-01-1971	Haripur	01-08-1993	01-06-1995
	35.	Fayaz Ahmad	Field Watcher	Matric	15602-0955359-7	01-04-1976	Swat	15-09-1993	15-09-1993
,	36.	Maroof Khan	Field Watcher	Under metric	21103-3493977-7	01-01-1967	Bajawar	01-10-1993	01-04-2014
	37.	Misrat	F/W	Nill	17301-8577859-1	01-07-1964	Peshawar	02-08-1994	01-11-1994
-	38.	Muhammad Zahir	F/W (BPS 3)	NIL	17101-0254107-9	1972	Charsadda	02-08-1994	02-08-1994
		Shah					· · _		
$\bigcirc$	39.	Qudrat Ullah	Field Watcher	Nil	12102-6394597-1	01-01-1963	Tank	10-10-1994	16-10-1994
Ś	40.	M.Farooq Khan	Naib Qasid	Nil	12201-7759671-1	01-07-1971	Tank	10-10-1994	16-10-1994
	41.	Muhammad Nawaz	Chowkidar	matric	12201-4159284-9	23-03-1974	Tank	10-10-1994	16-10-1994
	42.	Missal Khan	Field Watcher	Under Matric	13202-6857262-1	1987	Battagram	03-11-1994	03-11-1994
ŗ	43	Abdur Rab	Naib Qasid	Under Matric	13202-0729087-3	1965	Battagram	03-11-1994	03-11-1994
	44. +	Muhammad Niqab	Chowkidar	Under Matric	13202-3191461-9	1967	Battagram	03-11-1994	03-11-1994
;	45.	Rashid Ali	Field Watcher	Metric	13101-5131746-1	01-06-1973	Abbottabad	26-12-1994	01-08-1995
	46. ·	Farman Ali	Naib Qasid	-	17201-2097722-9	1966	Nowshera	19-01-1995	19-01-1995
ĺ	47.	M.Ikram	F/Watcher	-	12102-9591292-7	01-07-1962	D.I.Khan	01-02-1995	02-05-1995
	48.	Sar Anjam Khan	Naib Qasid	Primary	11101-1470110-5	1968	Bannu	03-08-1995	07-01-2007
	49.	Naik Nawaz	Field Watcher	Metric	11101-1442083-5	01-01-1975	Bannu	17-08-1995	07-01-2007
ĺ	50.	M. Aziz	Chowkidar	Matric	12101-7490702-7	25-01-1976	D.I.Khan	16-10-1995	16-10-1995
ļ	51.	Sadar Khan	Naib Qasid	Under matric		01-07-1971	Kohat	01-11-1995	09-02-2000
	52.	Sher Ajam	Field Watcher	Primary	-	1969	Bannu	02-11-1995	02-11-1995
	53.	Saraj Ali Khan	Field Watcher	Primary	13101-0930113-7	01-07-1970	Abbottabad	14-05-1996	14-05-1996
	54.	Muhammad Khan	Field Watcher	Under Matric	-	05-10-1965	Lakki Marwat	22-05-1996	22-05-1996
	55.	Muhammad Javed	Field Watcher	Metric	13101-0899755-9	01-01-1973	Abbottabad	10-09-1996	10-09-1996
	56.	Dilawar Khan	Field Watcher	Matric		29-04-1967	Lakki Marwat	03-02-1999	03-02-1999
Ì	57.	Mehtab Alam	Field Watcher	Metric		14-05-1983	Kohat	01-07-2004	01-07-2004
	58.	Mukhtiar Ahmad	Chowkidar	F.A	16202-0898252-9	20-07-1979	Swabi	06-12-2004	06-12-2004
	59.	Israr ul Haq	Chowkidar	-	14203-5269534-3	03-04-1973	Karak	12-02-2005	12-02-2005
	60.	Amjad Ali	Field Watcher	F.A	15402-7826612-3	11-02-1987	Malakand	09-03-2005	05-11-2013
	61.	Salawat Khan	Field Watcher	Nil	13301-0516209-3	02-03-1981	Haripur	25-03-2005	25-03-2005
	62.	Fazal Hadi	Chowkidar	-	15602-0308775-3	01-01-1962	Swat	03-05-2006	03-05-2006
	63.	Shabab Hussain	Field Watcher	B.A		18-03-1986	Hangu	01-07-2006	01-07-2006
	64.	Naveed Ahmad	Field Watcher	Nil	13302-0468517-9	11-11-1984	Haripur	21-09-2006	21-09-2006
	65.	Khan Azam	Field Watcher	Under Matric		15-03-1986	Lakki Marwat	24-08-2007	24-08-2007

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	66. 67. 68. 69.	Zia ul Hassan Habib ur Rehman	Field Watcher	Middle					
	67. 68.		Field Watcher						
	68.	adio ur Kenman	T' 11 XX . 1			21-01-1986	Karak	01-07-2008	01-07-2008
. 7		March 4	Field Watcher	M.A	12201-1485172-9	08-09-1988	Tank	27-10-2008	01-11-2008
. 77		Mushtaq Ahmed	Field Watcher	F.A	12201-1867995-3	08-08-1988	Tank	27-10-2008	01-11-2008
		Noor Aslam	Field Watcher	F.A	12201-8025725-1	01-03-1989	Tank	27-10-2008	01-11-2008
	<u>70.</u>	Rehman Ullah	Sweeper	Middle	12201-8954606-1	01-01-1989	Tank	27-10-2008	01-11-2008
	71.	Gul Rahman	Field Watcher		12201-9759667-7	01-03-1989	Tank	01-11-2008	01-11-2008
	<u>72.</u>	Azeem Khan	Field Watcher	B.A	15402-5816668-7	16-06-1972	Malakand	04-11-2008	04-11-2008
	73.	M.Tariq	N/Qasid	-	12101-6628879-7	21-01-1990	D.I.Khan	01-01-2009	01-01-2009
	74.	Jamshad Iqbal	Field Watcher	Matric		02-03-1979	Lakki Marwat	27-02-2009	27-02-2009
	75.	Taj Ali	Field Watcher	F.A	17201-2298356-5	11-04-1977	Nowshera	15-04-2009	15-04-2009
	76.	M.Kamran	F/Watcher	F.A	12101-0375691-9	10-05-1986	D.I.Khan	01-07-2009	08-01-2015
· · · · · · · ·	7.	Akhtar Zaman	Field Watcher	Under Matric	13202-5509321-5	1987	Battagram	15-09-2009	15-09-2009
	/8.	Imran Ullah	Field Watcher	-	14203-4310750-9	20-04-1978	Karak	16-10-2009	16-10-2009
	<u>'9.</u>	Sabir Hussain	Field Watcher	S.S.C	14202-1318670-3	16-02-1981	Karak	16-10-2009	16-10-2009
	0.	Fahim Khan	F/W	F.A	17301-0670024-9	30-04-1985	Peshawar	07-12-2009	01-03-2012
	1.	Hayat Khan	Naib Qasid	FA	16101-9527502-1	12-01-1983	Mardan	09-12-2009	01-03-2012
8		Abdul Malik	Chowkidar	BBA (hons)	13504-3404360-3	05-02-1991	Mansehra	14-01-2010	14-01-2010
8		Didar Ali	Field Watcher	Middle	16202-7069584-9	01-01-1990	Swabi	22-01-2010	22-01-2010
_84		Ajmal Hussain	Field Watcher	F.A	15302-0845902-1	07-03-1989	Dir Lower	01-02-2010	22-01-2010
8		Tasleem Khan	Naib Qasid	Middle	16202-0774813-9	1975	Swabi	05-04-2010	05-04-2010
80		Niamatullah	Chowkidar	Middle	11101-1464752-5	11-10-1979	Bannu	18-05-2010	18-05-2010
87		Muhammad Naeem	Field Watcher	Matric	16202-9086671-1	10-04-1977	Swabi	23-09-2010	23-09-2010
88		Iftikhar Ahmad	Field Watcher	Illiterate	13503-5036031-7	28-10-1973	Mansehra	09-12-2010	09-12-2010
89		Sabir Hussain	Chowkidar	Primary	13101-4916240-1	10-09-1981	Abbottabad	16-08-2011	16-08-2011
90		Abdul Waheed Khan	F/W	D.Com	17301-3417825-9	25-10-1984	Peshawar	20-09-2011	23-10-2018
91	1.	Rafeel Shah	Chowkidar	Nil		01-07-1980	Kohat	01-11-2011	01-01-2011
92	2.	Zubair Khan	N/Qasid	Nill	17301-7741864-9	15-03-1988	Peshawar	25-01-2012	01-01-2011
·) _93	3.	Ismail Babo	Chowkidar	Matric	17201-3971147-1	08-03-1983	Nowshera	20-03-2012	01-10-2013
94	4.	Faiz Muhammad	F/W	Matric	17301-8176950-3	16-01-1979	Peshawar	31-05-2012	
95	5.	Muhammad Idrees	Chowkidar	Matric	15602-0483035-1	03-04-1980	Swat	29-06-2012	17-02-2015
96		Amjad Iqbal	Field Watcher	-	14202-3724788-3	01-09-1988	Karak		29-06-2012
_97		Muhammad Raees	Chowkidar	Matric	13503-0621453-9	05-02-1982	Mansehra	18-04-2013	18-04-2013
98		Muhammad Azeem	Field Watcher	Nil	12201-8921512-7	01-07-1982	Tank	22-10-2013	22-10-2013
99		Sohail Anjum	Naib Qasid	F.A	13503-8172420-5	11-04-1983	Mansehra	22-10-2013	24-10-2013
10		Shafiq Mohammad	Chowkidar	Middle	15302-1761912-7	01-01-1994		23-10-2013	23-10-2013
10	~~	Bilal	Chowkidar	Matric		01-01-1994	Dir Lower Swabi	24-10-2013	24-10-2013
10		Fazal Mohammad	Chowkidar	F.A	14301-1979753-3	13-06-1978		06-01-2014	06-01-2014
10		Farman Ullah	Field Watcher	Under middle	15302-5135011-5	11-06-1978	Malakand Dir Lower	06-03-2014 21-03-2014	06-03-2014 01-04-2014

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- [	104.	Mustafa Kamal	Naib Qasid	Missing		18-04-1983	Shangla	21-03-2014	21-03-2014
۲.	105.	Nadeem Ahmad	Chowkidar	Metric	15302-6517191-9	04-04-1995	Dir Lower	15-09-2014	15-09-2014
•	106.	Said Nawab	Chowkidar	Matric	15102-0350775-7	03-03-1994	Buner	02-10-2014	25-11-2015
-	T07.	Fazal Haq	Chowkidar	B.A	15306-3685480-9	02-05-1983	Dir Lower	26-11-2014	26-11-2014
	108.	Sanaullah	F/Watcher	-	32103-0301968-1	04-04-1977	D.I.Khan	15-12-2014	15-12-2014
	109.	Shafi Ullah	Field Watcher	Matric	15701-0602316-9	10-04-1990	Dir Upper	24-02-2015	16-02-2015
	110.	Roohullah	Field Watcher	Matric	15704-5648153-3	01-01-1991	Dir Upper	24-02-2015	16-02-2015
•	111.	Asad Ullah	Naib Qasid	B.A	15701-2291214-3	08-02-1992	Dir Upper	24-02-2015	16-02-2015
	112.	Farzana	N/Qasid	-	17301-7436279-4	01-01-1978	Peshawar	13-03-2015	23-05-2019
.	113.	Shamsul Hassan	F/W	F.A	15201-6816377-3	03-03-1991	Chitral	01-04-2015	01-04-2015
-	114.	S.Muneer Ali	F/W	Matric	15201-0876166-1	02-02-1993	Chitral	01-04-2015	01-04-2015
	115.	Saifur Rehman	Naib Qasid	Matric	15201-1507009-1	17-10-1976	Chitral	01-04-2015	01-04-2015
	116.	Muhammad Osman	Chowkidar	Matric	15202-5795427-7	-	Chitral	01-04-2015	01-04-2015
	117.	Asad Ali	Field Watcher	Matric	15701-2195922-1	20-04-1997	Dir Upper	04-06-2015	04-06-2015
	118.	Muhammad Abid	Naib Qasid	Middle	42401-6376465-9	1985	Torghar	31-07-2015	03-08-2015
	119.	Abdur Raheem	Chowkidar	Middle	42101-2521610-5	05-03-1987	Torghar	31-07-2015	03-08-2015
Ì	120.	Taj Nabi	Field Watcher	F.A	42101-8774454-3	04-01-1989	Torghar	31-07-2015	03-08-2015
~	121.	Zakirullah	Field Watcher	F.A	13502-6816222-7	04-03-1991	Torghar	31-07-2015	03-08-2015
	122.	Gul Malik Khan	Field Watcher	Metric	13601-0500968-5	15-04-1994	Torghar	31-07-2015	03-08-2015
ľ	123.	Ajmal Khan	Field Watcher	Middle	13504-332701-9	02-03-1994	Torghar	31-07-2015	03-08-2015
	124.	Sair Gul	Field Watcher	-	17201-0863725-7	01-01-1985	Nowshera	07-09-2015	25-10-2018
Ī	125.	Anwar Ali	Field Watcher	F.A	16202-0861078-7	15-02-1983	swabi	01-11-2015	01-11-2015
	126.	Abu Sufyan	Naib Qasid	-	11101-6359424-2	04-04-1992	Karak	04-11-2015	01-07-2016
[	127.	Niaz Muhammad	Chowkidar	Nil	13302-4075725-9	17-02-1978	Haripur	08-12-2015	08-12-2015
-	128.	Raj Mohammad	Field Watcher	F.Sc	15402-7462757-3	04-02-1987	Malakand	09-12-2015	09-12-2015
	129.	Said Noor Bacha	Naib Qasid	9 <sup>th</sup>	15101-0401841-1	01-01-1979	Buner	11-04-2016	11-04-2016
	130.	Hazrat Maaz	Field Watcher	-	15401-3258179-7	06-12-1996	Malakand	19-08-2016	19-08-2016
	131.	Muhammad Amin	Field Watcher	Matric	42401-1638926-9	06-09-1982	Swabi	31-03-2017	31-03-2017
	132.	Ahmad zaman	Field Watcher	Metric	13302-4262875-1	26-04-1993	Haripur	01-04-2017	01-04-2017
	133.	Mohammad Zahid	Field Watcher	Middle	16202-7536904-9	08-10-1984	Swabi.	01-07-2017	01-07-2017
	134.	Sheryar Ahmad	Field Watcher	B.Sc	15607-0362542-7	15-02-1997	Swat	31-08-2017	31-08-2017
	135.	Rashid Mehmood	F/Watcher		12103-8206947-9	14-05-1979	D.I.Khan	01-09-2017	01-09-2017
	136.	Sher Zada	F/W	Under matric			Hangu	13-10-2017	
	137.	Taib Rehman	F/W	Matric			Hangu	13-10-2017	
	138.	Obaid rehman	Naib Qasid	Under matric			Hangu	13-10-2017	
	139.	Minhajudin	Chowkidar	B.A			Hangu	14-10-2017	
	140.	Amjid Ahmad	Field Worker	Metric	17201-2187918-7	10-04-1977	Nowshera	09-11-2017	09-11-2017
	141.	Haris Hussain	Field Worker	F.SC	17201-7968349-1	29-04-1997	Nowshera	13-11-2017	13-11-2017

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1/0	Shad Ali Shah	Chowkidar	Metric	17201-8371422-5	03-10-1995	Nowshera	13-11-2017	13-11-2017
					06-08-1981	Nowshera	13-11-2017	13-11-2017
					06/02/1999	Charsadda	07-12-2017	07-12-2017
	······································		the second s		17-06-1984	Nowshera	05-01-2018	05-01-2018
					01-07-1978	Dir Upper	24-01-2018	24-01-2018
						Charsadda	26-01-2018	26-01-2018
						Bannu	01-02-2018	01-02-2018
			Motric				06-02-2018	07-02-2018
-							02-07-2018	02-07-2018
	······································						30-07-2018	30-07-2018
							· · · · · · · · · · · · · · · · · · ·	15-08-2018
			-					06-12-2018
• •							· · · · · · · · · · · · · · · · · · ·	06-12-2018
154.		· · · · · · · · · · · · · · · · · · ·						18-12-2018
155.	Hashim Khan							18-06-2019
156.	Raza Muhammad Khan							24-06-2019
157.	Naveed Anjum	Field Watcher	MA Islamiyat					26-06-2019
158.	Ali Rehman	Chowkidar	Metric				<u></u>	
159.	Haidar Hayat	Field Watcher	F.A					23-07-2019
160.	Kashif Shah	Chowkidar	F.SC	17301-2575897-9				23-09-2019
161.	Aizaz Ahmad	Chowkidar	Middle	17301-4242957-5	30-04-1994	Peshawar	23-09-2019	23-09-2019
	142.         143.         144.         145.         146.         147.         148.         149.         150.         151.         152.         153.         154.         155.         156.         157.         158.         159.         160.         161.	<ul> <li>143. Rahayat Shah</li> <li>144. Taimur jan</li> <li>145. Riaz Muhammad</li> <li>146. Khan Zeb</li> <li>147. Muhammad Qaiser</li> <li>148. Dur Kamil</li> <li>149. Farooq ahmad</li> <li>150. Mohammad Qaiser</li> <li>151. Yousaf khan</li> <li>152. Noor Muhammad</li> <li>153. Muhammad Noman</li> <li>154. Munir Ahmad</li> <li>155. Hashim Khan</li> <li>156. Raza Muhammad Khan</li> <li>157. Naveed Anjum</li> <li>158. Ali Rehman</li> <li>159. Haidar Hayat</li> <li>160. Kashif Shah</li> </ul>	143.Rahayat ShahChowkidar144.Taimur janF/W (BPS 3)145.Riaz MuhammadField Watcher146.Khan ZebChowkidar147.Muhammad QaiserF/W (BPS 3)148.Dur KamilField Watcher149.Farooq ahmadField Watcher150.Mohammad QaiserChowkidar151.Yousaf khanChowkidar152.Noor MuhammadNiab Qasid153.Muhammad NomanNaib Qasid154.Munir AhmadField Watcher155.Hashim KhanField Watcher156.Raza Muhammad KhanField Watcher157.Naveed AnjumField Watcher158.Ali RehmanChowkidar159.Haidar HayatField Watcher160.Kashif ShahChowkidar	143.Rahayat ShahChowkidarMetric144.Taimur janF/W (BPS 3)S.S.C145.Riaz MuhammadField WatcherMetric146.Khan ZebChowkidarNil147.Muhammad QaiserF/W (BPS 3)NIL148.Dur KamilField Watcher-149.Farooq ahmadField WatcherMatric150.Mohammad QaiserChowkidarMatric151.Yousaf khanChowkidarMatric152.Noor MuhammadNiab Qasid-153.Muhammad NomanNaib QasidMBA154.Munir AhmadField WatcherMatric155.Hashim KhanField WatcherUnder Metric156.Raza Muhammad KhanField WatcherMatric157.Naveed AnjumField WatcherMA Islamiyat158.Ali RehmanChowkidarMetric159.Haidar HayatField WatcherF.A160.Kashif ShahChowkidarF.SC	143.         Rahayat Shah         Chowkidar         Metric         17201-2264822-9           144.         Taimur jan         F/W (BPS 3)         S.S.C         17101-4766248-5           144.         Taimur jan         Field Watcher         Metric         17201-2368555-5           145.         Riaz Muhammad         Field Watcher         Metric         17201-2368555-5           146.         Khan Zeb         Chowkidar         Nil         15701-4231858-9           147.         Muhammad Qaiser         F/W (BPS 3)         NIL         17102-0496483-9           148.         Dur Kamil         Field Watcher         -         11101-1694743-9           149.         Farooq ahmad         Field Watcher         Matric         12201-8921512-7           150.         Mohammad Qaiser         Chowkidar         F.A         13101-3425879-7           151.         Yousaf khan         Chowkidar         Matric         12201-4159284-9           152.         Noor Muhammad         Niab Qasid         -         15602-7702853-1           153.         Muhammad Noman         Naib Qasid         MBA         13503-0674613-3           155.         Hashim Khan         Field Watcher         Matric         13202-5696425-5           156. <td>142.       Saad All Shah       Chowkidar       Metric       17201-2264822-9       06-08-1981         143.       Rahayat Shah       Chowkidar       Metric       17201-2264822-9       06-08-1981         144.       Taimur jan       F/W (BPS 3)       S.S.C       17101-4766248-5       06/02/1999         145.       Riaz Muhammad       Field Watcher       Metric       17201-2368555-5       17-06-1984         146.       Khan Zeb       Chowkidar       Nil       15701-4231858-9       01-07-1978         147.       Muhammad Qaiser       F/W (BPS 3)       NIL       17102-0496483-9       01/01/1989         147.       Muhammad Qaiser       Field Watcher       -       11101-1694743-9       20-4-1994         148.       Dur Kamil       Field Watcher       Matric       12201-8921512-7       02-07-1999         150.       Mohammad Qaiser       Chowkidar       Matric       12201-4159284-9       07-03-1996         151.       Yousaf khan       Chowkidar       Matric       13201-3425879-7       24-02-1984         153.       Muhammad Noman       Naib Qasid       -       15602-7702853-1       15-04-1984         153.       Muhammad Noman       Naib Qasid       Matric       13202-5696425-5       198</td> <td>142.Saad Ah ShahChowkidarMetric17201-0017100007-0017100143.Rahayat ShahChowkidarMetric17701-2264822-906-08-1981Nowshera144.Taimur janF/W (BPS 3)S.S.C17101-4766248-506/02/1999Charsadda144.Taimur janField WatcherMetric17201-2368555-517-06-1984Nowshera145.Kiaz MuhammadField WatcherMetric17201-2368555-517-06-1984Nowshera146.Khan ZebChowkidarNil15701-4231858-901-07-1978Dir Upper147.Muhammad QaiserF/W (BPS 3)NIL17102-0496483-901/01/1989Charsadda148.Dur KamilField Watcher-11101-1694743-920-4-1994Bannu149.Farooq ahmadField WatcherMatric12201-8921512-702-07-1999Tank150.Mohammad QaiserChowkidarMatric12201-4159284-907-03-1996Tank151.Yousaf khanChowkidarMatric12503-0674613-301-11-1984Swat152.Noor MuhammadNiab Qasid-15602-7702853-115-04-1984Swat153.Muhammad NomanNaib QasidMatric13203-0674613-301-11-1982Mansehra154.Munir AhmadField WatcherMatric13202-5696425-51986Battagram155.Hashim KhanField WatcherMatric17102-5351510-728-01-1978Charsadda156.Raza Mu</td> <td>142.       Saad Ali Shah       Chowkidar       Metric       17201-321422-9       06-08-1981       Nowshera       13-11-2017         143.       Rahayat Shah       Chowkidar       Metric       17201-2264822-9       06-08-1981       Nowshera       07-12-2017         144.       Taimur jan       F/W (BPS 3)       S.S.C       17101-4766248-5       06/02/1999       Charsadda       07-12-2017         145.       Riaz Muhammad       Field Watcher       Metric       17201-2368555-5       17-06-1984       Nowshera       05-01-2018         146.       Khan Zeb       Chowkidar       Nil       15701-4231858-9       01-07-1978       Dir Upper       24-01-2018         147.       Muhammad Qaiser       F/W (BPS 3)       NIL       17102-0496483-9       01/01/1989       Charsadda       26-01-2018         148.       Dur Kamil       Field Watcher       -       11101-1694743-9       20-4-1994       Bannu       01-02-2018         149.       Farooq ahmad       Field Watcher       Matric       12201-8921512-7       02-07-1994       Abbottabad       02-07-2018         150.       Mohammad Qaiser       Chowkidar       F.A       13101-3425879-7       24-02-1984       Abbottabad       02-07-2018         151.       Yous</td>	142.       Saad All Shah       Chowkidar       Metric       17201-2264822-9       06-08-1981         143.       Rahayat Shah       Chowkidar       Metric       17201-2264822-9       06-08-1981         144.       Taimur jan       F/W (BPS 3)       S.S.C       17101-4766248-5       06/02/1999         145.       Riaz Muhammad       Field Watcher       Metric       17201-2368555-5       17-06-1984         146.       Khan Zeb       Chowkidar       Nil       15701-4231858-9       01-07-1978         147.       Muhammad Qaiser       F/W (BPS 3)       NIL       17102-0496483-9       01/01/1989         147.       Muhammad Qaiser       Field Watcher       -       11101-1694743-9       20-4-1994         148.       Dur Kamil       Field Watcher       Matric       12201-8921512-7       02-07-1999         150.       Mohammad Qaiser       Chowkidar       Matric       12201-4159284-9       07-03-1996         151.       Yousaf khan       Chowkidar       Matric       13201-3425879-7       24-02-1984         153.       Muhammad Noman       Naib Qasid       -       15602-7702853-1       15-04-1984         153.       Muhammad Noman       Naib Qasid       Matric       13202-5696425-5       198	142.Saad Ah ShahChowkidarMetric17201-0017100007-0017100143.Rahayat ShahChowkidarMetric17701-2264822-906-08-1981Nowshera144.Taimur janF/W (BPS 3)S.S.C17101-4766248-506/02/1999Charsadda144.Taimur janField WatcherMetric17201-2368555-517-06-1984Nowshera145.Kiaz MuhammadField WatcherMetric17201-2368555-517-06-1984Nowshera146.Khan ZebChowkidarNil15701-4231858-901-07-1978Dir Upper147.Muhammad QaiserF/W (BPS 3)NIL17102-0496483-901/01/1989Charsadda148.Dur KamilField Watcher-11101-1694743-920-4-1994Bannu149.Farooq ahmadField WatcherMatric12201-8921512-702-07-1999Tank150.Mohammad QaiserChowkidarMatric12201-4159284-907-03-1996Tank151.Yousaf khanChowkidarMatric12503-0674613-301-11-1984Swat152.Noor MuhammadNiab Qasid-15602-7702853-115-04-1984Swat153.Muhammad NomanNaib QasidMatric13203-0674613-301-11-1982Mansehra154.Munir AhmadField WatcherMatric13202-5696425-51986Battagram155.Hashim KhanField WatcherMatric17102-5351510-728-01-1978Charsadda156.Raza Mu	142.       Saad Ali Shah       Chowkidar       Metric       17201-321422-9       06-08-1981       Nowshera       13-11-2017         143.       Rahayat Shah       Chowkidar       Metric       17201-2264822-9       06-08-1981       Nowshera       07-12-2017         144.       Taimur jan       F/W (BPS 3)       S.S.C       17101-4766248-5       06/02/1999       Charsadda       07-12-2017         145.       Riaz Muhammad       Field Watcher       Metric       17201-2368555-5       17-06-1984       Nowshera       05-01-2018         146.       Khan Zeb       Chowkidar       Nil       15701-4231858-9       01-07-1978       Dir Upper       24-01-2018         147.       Muhammad Qaiser       F/W (BPS 3)       NIL       17102-0496483-9       01/01/1989       Charsadda       26-01-2018         148.       Dur Kamil       Field Watcher       -       11101-1694743-9       20-4-1994       Bannu       01-02-2018         149.       Farooq ahmad       Field Watcher       Matric       12201-8921512-7       02-07-1994       Abbottabad       02-07-2018         150.       Mohammad Qaiser       Chowkidar       F.A       13101-3425879-7       24-02-1984       Abbottabad       02-07-2018         151.       Yous

Certified that the Seniority list is final, circulated and undisputed.

Director General Soil & Water Conservation Khyber Pakhtunkhwa

Endst: No. 1809 - 3,2 /DGSWC,

Dated at Peshawar the \_\_\_\_\_

08 2020

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Director General Soil & Water Conservation Khyber Pakhtunkhwa

1.

Service Appeal No.6338/2020

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **Respondents** 

#### **REJOINDER ON BEHALF OF APPELLANT**

## **Respectfully Sheweth:**

# **Rejoinder to Preliminary Objections:**

Preliminary objections from 1 to 4 are flimsy one, appellant has the locus standi, no fact is concealed, and this Hon'ble Tribunal has the jurisdiction because the cause of action accrued within the jurisdiction of this Hon'ble Tribunal, and that's why matter was referred to the Tribunal by the Hon'ble Peshawar High Court, Peshawar.

#### Rejoinder on Facts:

- 1. Para No.1 needs no rejoinder, being admitted.
- 2. Para No.2 needs no rejoinder, being admitted.
- 3. Para No.3 needs no rejoinder, being admitted.

4. In reply to Para No.4, it is submitted that real facts are tried to conceal by the respondents because the judgment is very much clear, and deviation from the same is made.

2 . .

- Para No.5 is against the law, because the rules are 5. framed for the department's employees and admittedly appellant is working therein, now the first priority is to be given to the employees for promotion vacant on posts, but malafidely respondents issued advertisement twice, for their blue eyed adjustment.
- Order of the Hon'ble Peshawar High Court, Peshawar by itself is clear, that's why appellant is now before this Hon'ble Tribunal.
- 7. The said reply is strong arguments of the appellant because since years there were no rules of the department, but the other departments under the same Secretary and D.G enjoyed the privileges but discrimination for years were made with the appellant, rather no fact is concealed.
- 8. As admitted that's why needs no reply.

# Rejoinder on Grounds:

As grounds "A" to "N" of the appeal are legal and in reply the same were tried to controvert, that's why not sustainable in the eye of law.

It is, therefore, most humbly prayed that the appeal of the appellant may be admitted and allowed with heavy cost on the respondents.

Through

Appellant

# Dated: 09.12.2021

Shah Faisal Ilyas Advocate High Court

Service Appeal No.6338/2020

#### VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . RESPONDENTS

#### <u>AFFIDAVIT</u>

I, Muhammad Abbas, Naib Qasid (BPS-3), Soil & Water Conservation, Agricultural Department, Haripur, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

N ÷١,

DÈPONÈNT

. . .

#### IN PURSUANCE OF SECTION-8(1) OF KHYBER PAKHTUNKHWA CIVIL SERVANT ACT, 1973 READ WITH RULESE 17 OF KHYBER PAKHTUNKHWA CIVIL SERVANT (APPOINTMENT PROMOTION AND TRANSFER) RULES 1989 FINAL SENIORITY LIST OF CLASS-IV (NAIB QASID, CHOWKIDAR FIELD WATCHER KHALASI AND SWEEPER) AS OF DIRECTORATE GENERAL SOIL AND WATER CONSERVATION KHYBER PAKHTUNKHWA AS IT STOOD ON 31-12-2021 NOTIFIED/CIRCULATED AS UNDER

S.No	Name	Designation	Qualification	CNIC No	Date of Birth	Home District.	Date of 1 <sup>st</sup> appointment	Date of prese position
1.	Muhammad Wali Shah	Chowkidar	Metric	14203-7484300-7	18-07-1962	Karak	28-02-1981	28-02-1981
2.	Fazal Rahim	Field Watcher	Matric	17201-8274024-5	15-11-1960	Nowshera	05-05-1987	01-10-1993
3.	Latif ur Rehman	Field Watcher	Metric	15701-2282169-3	01-04-1968	Dir Lower	01-12-1987	1-04-2014
4.	Sami Ullah	Field Watcher	F.A	15602-0262953-5	15-03-1974	Swat	07-06-1990	07-06-1990
5.	Inavatullah shah	Field Watcher	Matric	13301-1338460-5	14-02-1965	Haripur	24-10-1992	24-10-1992
6.	Atta Ullah jan	Field Watcher	Matric	13301-0601500-1	30-10-1968	Haripur	24-10-1992	24-10-1992
7.	Muhammad Sabir	Field Watcher	Metric	13101-0869987-9	08-05-1969	Abbottabad	26-10-1992	26-10-1992
8.	Muhammad Abbas	Naib Qasid	Matric	13302-0494673-1	10-04-1968	Haripur	06-04-1993	06-04-1993
9:	Asmat Nawaz	Field Watcher	F.A	13301-1320470-5	01-01-1971	Haripur	01-08-1993	01-06-1995
10.	Fayaz Ahmad	Field Watcher	Matric	15602-0955359-7	01-04-1976	Swat	15-09-1993	15-09-1993
11.	Muhammad Nawaz	Chowkidar	Matric	12201-4159284-9	23-03-1974	Tank	10-10-1994	16-10-1994
12.	Rashid Ali	Field Watcher	Metric	13101-5131746-1	01-06-1973	Abbottabad	26-12-1994	01-08-1995
13.	Naik Nawaz	Field Watcher	Metric	11101-1442083-5	01-01-1975	Bannu	17-08-1995	07-01-2007
14	M. Aziz	Chowkidar	Matric	12101-7490702-7	25-01-1976	D.I.Khan	16-10-1995	16-10-1995
1′5.	Muhammad Javed	Field Watcher	Metric	13101-0899755-9	01-01-1973	Abbottabad	10-09-1996	10-09-1996
16.	Dilawar Khan	Field Watcher	Matric		29-04-1967	Lakki Marwat	03-02-1999	03-02-1999
17.	Mehtab Alam	Field Watcher	Metric		14-05-1983	Kohat	01-07-2004	01-07-2004
18.	Mukhtiar Ahmad	Chowkidar	F.A	16202-0898252-9	20-07-1979	Swabi	06-12-2004	06-12-2004
19.	Amjad Ali	Field Watcher	F.A	15402-7826612-3	11-02-1987	Malakand	09-03-2005	05-11-2013
20.	Shabab Hussain	Field Watcher	B.A		18-03-1986	Hangu	01-07-2006	01-07-2006
21.	Habib ur Rehman	Field Watcher	M.A	12201-1485172-9	08-09-1988	Tank	27-10-2008	01-11-2008
22.	Mushtaq Ahmed	Field Watcher	F.A	12201-1867995-3	08-08-1988	Tank	27-10-2008	01-11-2008
23.	Noor Aslam	Field Watcher	F.A	12201-8025725-1	01-03-1989	Tank	27-10-2008	01-11-2008
24.	Azeem Khan	Field Watcher	B.A	15402-5816668-7	16-06-1972	Malakand	04-11-2008	04-11-2008
25.	Jamshad Iqbal	Field Watcher	Matric		02-03-1979	Lakki Marwat	27-02-2009	27-02-2009
26.	Taj Ali	Field Watcher	F.A	17201-2298356-5	11-04-1977	Nowshera	15-04-2009	15-04-2009
27.	M.Kamran	F/Watcher	F.A	12101-0375691-9	10-05-1986	D.I.Khan	01-07-2009	08-01-2015
28.	Sabir Hussain	Field Watcher	S.S.C	14202-1318670-3	16-02-1981	Karak	16-10-2009	16-10-2009

•	29. Fahim Khan								
	30. Hayat Khan	F/W	F.A	17301-0670024-	0				
	31. Abdul Malik	Naib Qasid	FA	16101-9527502		Peshawar	07-12-200	0 01 00 00	
· · ·	32. Ajmal Hussain	Chowkidar	BBA (hons)	13504-3404360-		Mardan	09-12-200		
	33. Muhammad Naeem	Field Watcher	· FA	15302-0845902-			14-01-2010		
	34. Abdul Waheed Khar	Field Watcher	Matric	16202-9086671-		Dir Lower	01-02-2010		
	35. Ismail Babo	the second se	D.Com	17301-3417825-9		Swabi	23-09-2010		
· · · · ·	6. Faiz Muhammad	Chowkidar	Matric	17201-3971147-1			20-09-2011		
3	7. Muhammad Idrees	F/W	Matric	17301-8176950-3			20-03-2012	10 2010	
3	8. Muhammad Raees	Chowkidar	Matric	15602-0483035-1		Peshawar	31-05-2012	10 201J	
39	9. Sohail Anjum	Chowkidar	Matric	13503-0621453-9		smat	29-06-2012		
40	0. Bilal	Naib Qasid	F.A	13503-8172420-5		Mansehra	22-10-2013	29-06-2012 22-10-2013	
41		Chowkidar	Matric	16201-5044305-7		Mansehra	23-10-2013	23-10-2013	
. 42	2. Mustafa Kamal	Chowkidar	F.A	14301-1979753-3		Swabi	06-01-2014	06-01-2014	
43	3. Nadeem Ahmad	Naib Qasid	Missing			Malakand	06-03-2014	06-03-2014	
44	. Said Nawab	Chowkidar	Metric	15302-6517191-9	18-04-1983	Shangla	21-03-2014	21-03-2014	
45	. Fazal Haq	Chowkidar	Matric	15102-0350775-7	04-04-1995	Dir Lower	15-09-2014	15-09-2014	
46.	. Shafi Ullah	Chowkidar	B.A	15306-3685480-9	03-03-1994	Buner	02-10-2014	25-11-2015	
47.	Roohullah	Field Watcher	Matric	15701-0602316-9	02-05-1983	Dir Lower	26-11-2014	26-11-2013	
48.	Asad Ullah	Field Watcher	Matric	15704-5648153-3	10-04-1990 01-01-1991	Dir Upper	24-02-2015	16-02-2015	
: 49.	Shamsul Hassan	Naib Qasid F/W	B.A	15701-2291214-3	08-02-1992	Dir Upper	24-02-2015	16-02-2015	
50.	S.Muneer Ali	F/W	F.A	15201-6816377-3	03-03-1992	Dir Upper	24-02-2015	16-02-2015	
51.	Saifur Rehman	Naib Qasid	Matric	15201-0876166-1	02-02-1993	Chitral	01-04-2015	01-04-2015	
52.	Muhammad Osman	Chowkidar	Matric	15201-1507009-1	17-10-1976	Chitral	01-04-2015	01-04-2015	-
53.	Asad Ali	Field Watcher	Matric	15202-5795427-7	-	Chitral	01-04-2015	01-04-2015	-
54.	Taj Nabi	Field Watcher	Matric	15701-2195922-1	20-04-1997	Chitral	01-04-2015	01-04-2015	1
55.	Zakirullah	Field Watcher	F.A	42101-8774454-3	04-01-1989	Dir Upper	04-06-2015	04-06-2015	-
56.	Gul Malik Khan	Field Watcher	F.A	13502-6816222-7	04-03-1991	Torghar	31-07-2015	03-08-2015	4
57.	Anwar Ali	Field Watcher	Metric	13601-0500968-5	15-04-1994	Torghar	31-07-2015	03-08-2015	}
58.	Raj Mohammad	Field Watcher	F.A F.Sc	16202-0861078-7	15-02-1983	Torghar	31-07-2015	03-08-2015	
59.	Muhammad Amin	Field Watcher		15402-7462757-3	04-02-1987	swabi Malakan I	01-11-2015	01-11-2015	
60.	z minau zaman	Field Watcher	Matric	42401-1638926-9	06-09-1982	Malakand Swabi	09-12-2015	09-12-2015	
61.	Sheryar Ahmad	Field Watcher	Metric B.Sc	13302-4262875-1	26-04-1993		31-03-2017	31-03-2017	
62.	Talo Kenman	F/W	Matric	15607-0362542-7	15-02-1997	Haripur Swat	01-04-2017	01-04-2017	
63.	Minhajudin	Chaulit	B.A			Hangu	31-08-2017	31-08-2017	
64.	Amjia Ahmad	D* 11774	Metric			Hangu	13-10-2017		
65.	Trails Hussain	F. 11.1.	F.SC	17201-2187918-7	10-04-1977	Nowshera	14-10-2017		
66.			N.C	17201-7968349-1	29-04-1997	Nowshera		09-11-2017	
7					03-10-1995	Nowshera		13-11-2017	
						rowsheld	13-11-2017	13-11-2017	

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· [	67.	Rahayat Shah	Chowkidar	Metric	1,7201-2264822-9	06-08-1981	Nowshera	13-11-2017	13-11-2017
- i-	68.	Taimur jan	F/W (BPS 3)	S.S.C	17101-4766248-5	06/02/1999	Charsadda	07-12-2017	07-12-2017
- I-	<u>69.</u>	Riaz Muhammad	Field Watcher	Metric	17201-2368555-5	17-06-1984	Nowshera	05-01-2018	05-01-2018
	70.	Farooq ahmad	Field Watcher	Matric	12201-8921512-7	02-07-1999	Tank	06-02-2018	07-02-2018
	71.	Mohammad Qaiser	Chowkidar	F.A	13101-3425879-7	24-02-1984	Abbottabad	02-07-2018	02-07-2018
-	72.	Yousaf khan	Chowkidar	Matric	12201-4159284-9	07-03-1996	Tank	30-07-2018	30-07-2018
r	73.	Muhammad Noman	Naib Qasid	MBA	13503-1368730-7	26-02-1989	Mansehra	06-12-2018	06-12-2018
F	74.	Munir Ahmad	Field watcher	Matric	13503-0674613-3	01-11-1982	Mansehra	06-12-2018	06-12-2018
┝	75.	Raza Muhammad Khan	Field Watcher	Matric	17102-5351510-7	28-01-1978	Charsadda	18-06-2019	18-06-2019
H			Field Watcher	MA Islamiyat	12101-8771738-1	-02-04-1985	D.I.Khan	24-06-2019	24-06-2019
	76.	Naveed Anjum	Chowkidar	Metric	17101-0250378-1	12-05-1977	Charsadda	26-06-2019	26-06-2019
Ļ	77.	Ali Rehman	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·		30-05-1991	Karak	23-07-2019	23-07-2019
	78.	Haidar Hayat	Field Watcher	F.A	14202-9780799-7				
ſ	79.	Kashif Shah	Chowkidar	F.SC	17301-2575897-9	10-03-1999	Peshawar	23-09-2019	23-09-2019

<sup>•</sup> Certified that the Seniority list is final, circulated and undisputed.

Å

Director General Soil & Water Conservation Khyber Pakhtunkhwa

DIRECTORATE GENERAL SOIL & WATER CONSERVATION K	HYBER PAKI	ITUNKHWA	st.
<sup>*</sup> Agriculture Services Academy (ASA) Campus, Opposite Islamia	College, Jamru	d Road, Peshawar.	
Whttp://soilconservation.kp.gov.pk 🛛 🖄 dgswckp@gmail.com 🕻	091-922433	1 091-5842912	
<u> "Save Soil and Water"</u>	No	/DGSWC	200
ತೆ. ಶ್ವೀತಿ ಇಗಲಿಗಳಾಗ ಭೇಷವಾರೆಗಳವನು 300 ಮೊದಲಾಗಿ ಸಾಮಾನಿಸಿ ಮತ್ತು ಎಂದು ಆರಂಭ ಸಂಗ್ರೆಯೆಗಳು ಕರ್ಷಾರ್ಶನ ಕರ್ಮಿಸಿಕೊಂಡಿದೆ. ಕರ್ಮಿಸಿಕೊಂಡಿ ಗೋರ್ ಭೇಷವಾಗಿ ಗಳವಾಗಿ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂದ ಕರ್ಮನಿಂ	Dated:	/ / 2022	

It is humbly submitted that in compliance of the order by the Honourable Peshawar High Court Dated 20-11-2019 in COC no.200 P/2019 in W.P no 96-P/2018, 03 No class IV have already been promoted on 21-10-2020 (Annex 1) as junior clerk on the basis of newly framed service rule of the Directorate General Soil and Water Conservation by implementing 33% quota.The remaining 33% qouta for class IV will be fully observed in next six month as 07 no vacancies for the post of junior clerk will be available before September 2022.

> Director General Soil and Water Conservation Khyber Pakhtunkhwa Peshawar

DIRECT UNATE Services Academy (ASA) Campus, Opposit

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# d, Peshawar. 1 091-5842912



Consequent upon the recommendations of the Departmental Promotion Committee in its meeting held on 20-10-2020 under the Chairmanship of the Director General Soil and Water Conservation, Khyber Pakhtunkhwa, Peshawar, the following Class-IV (BS-03) employees of the Directorate General Soil and Water Conservation Khyber Pakhtunkhwa are hereby promoted/ transferred/ adjusted against the vacant posts of Junior Clerk (BS-11) with immediate effect in the linterest of public service, as per details below;

ĺ	Šт. No.	Name of Official	From	То	Remarks.
	<u>No.</u> I.	Muhammad Wali Shah	Office of the Director Soil and Water Conservation, Karak.	Office of the District Officer Soil and Water Conservation, Orakzai.	Against the vacant post of Junior Clerk
	2.	Mr. Fazal Rahim Khan	Office of the District Officer Soil and Water Conservation, Nowshera.	Office of the District Officer Soil and Water Conservation, Nowshera.	Against the vacant post of Junior Clerk
	3.	Mr. Latif ur Rehman	Office of the District Officer Soil and Water Conservation, Dir Upper.	Office of the District Officer Soil and Water	Against the vacant post of Junior Clerk

Sd/-(MUHAMMAD YASEEN KHAN)

Director General Soil & Water Conservation Khyber Pakhtunkhwa Peshawar.

/ 2020.

Endst. No. 2064-76 /DGSWC,

Dated at Peshawar, the 21 10

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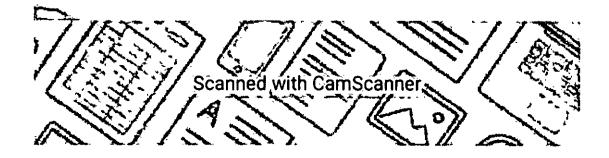
- 1. The Section Officer (Establishment), Government of Khyber Pakhtunkhwa, Agriculture, Livestock and Cooperative Department, Peshawar.
- 2. The District Accounts Officers, Karak, Nowshera, Dir Upper, Orakzai and Chitral.
- 3. The Director Soil and Water Conservation, Karak.
- 4. The District Officer Soil and Water Conservation, Nowshera, Dir Upper, Orakzai and Chitral.
- 5. The Accountant of this office.
- 6. The Officials concerned.

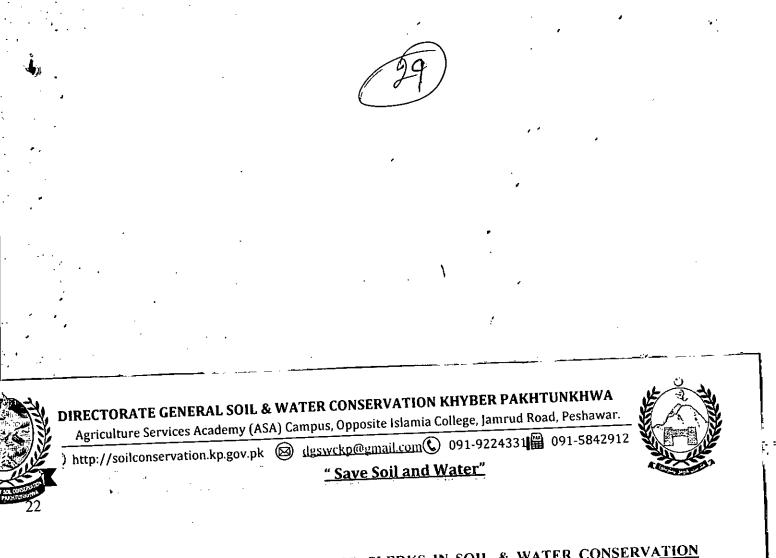
for information and necessary action, please.

Alleste J

**DISTRICT OFFICE** SOL CONSERVATION NUMBERA

Director General Soli & Water Conservation Khyber Pakhtunkhwa Peshawar.





# DETAIL OF SANCTIONED POSTS OF JUNIOR CLERKS IN SOIL & WATER CONSERVATION DEPARTMENT GOVERNAMENT OF KHYBER PAKHTUNKHWA.

S.	Nomeno ature	BPS	Number of Sæntioned Posts	Through initial recruitment	Through 100% deceased / Medical Quota	Through 33% under Employees quota	Vacant 03
1.	Junior Clerk	11	30	16	8	03	00

Director General

Soul & Water Conservation Khyber Pakhtunkhwa, Peshawar

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·	an shekaran T	•••••••••••	9.7 m s	<b>،</b> مرجع محمد ا	····	•	e ale	• •• •	4
<u>33.</u> 34.	Fahim Khan Hayat Khan	• F/W	· · · · · · ·	17301-0670024-9	130.04.1005		en Romana de	••••	
34. 35.	Hayat Khan Attà ur Rahman	F/W Naib Qasid Naib Qasid	FA	17301-0670024-5 16101-9527502-1	12-01-1983		07-12-2009	01-03-2012	•
34.	Hayat Khan Attà ur Rahman Abdul Malik	Naib Qasid Naib Qasid Chowkidar	FA Matric BBA (hons)	16101-9527502-1	12-01-1983	Mardan Peshawar	09-12-2009	01-12-2010	•
34. 35. 36. 37. 38.	Hayat Khan     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem	Naib Qasid Naib Qasid Chowkidar Field Watcher	FA Matric BBA (hons) F.A	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1	12-01-1983 10-01-1979 05-02-1991	Mardan Peshawar Mansehra	09-12-2009 15-12-2009 01-01-2010	01-12-2010 15-12-2009 14-01-2010	
34. 35. 36. 37. 38. 39.	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Abduf Waheed Khan	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W	FA Matric BBA (hons) F.A Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977	Mardan Peshawar Mansehra Dir Lower	09-12-2009 15-12-2009 01-01-2010 01-02-2010	01-12-2010 15-12-2009 14-01-2010 23-05-1987	
34. 35. 36. 37. 38. 39. 40.	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Addul Waheed Khan Vismail Babo	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar	FA Matric BBA (hons) F.A Matric O.Com	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984	Mardan Peshawar Mansehra	09-12-2009 15-12-2009 01-01-2010 01-02-2010 23-09-2010	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010	
34, 35, 36, 37, 38, 39, 40, 39, 41,	Hayat Khan     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     ''Ismail Babo     Faiz Muhammad	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher Ff/w Chowkidar F/W	FA Matric BBA (hons) F.A Matric D.Com Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983	Mardan Peshawar Manschra Dir Lower Swabi Peshawar Nowshera	09-12-2009 15-12-2009 01-01-2010 01-02-2010	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018	
34. 35. 36. 37. 38. 39. 40. 39. 40. 39. 40. 39. 40. 39. 41. 42. 43.	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Abdul Waheed Khan Vismail Babo Faiz Muhammad Muhammad Idrees Muhammad Races	Naib Qasid Naib Qasid Chowkidar Field Watcher Ffw Chowkidar F/W Chowkidar	FA Matric BBA (hons) F.A Matric D.Com Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1979	Mardan Peshawar Manschra Dir Lower Swebi Peshawar Peshawar Peshawar	09-12-2009 15-12-2009 01-01-2010 01-02-2010 23-09-2010 20-09-2011 20-03-2012 31-05-2012	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013	
34 35 36 37 38 39 40 39 40 39 40 39 40 39 40 39 40 39 40 39 40 39 40 44	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Abdul Waheed Khan Vismail Babo Faiz Muhammad Muhammad Idrees Muhammad Races Sohail Anjum	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar F/W Chowkidar Chowkidar	FA Matric BBA (hons) FA Matric D.Com Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-08455902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621451-0	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-03-1980	Mardan Peshawar Manschra Dir Cower Swrabi Peshawar Nowshera Peshawar Swat	09-12-2009 15-12-2009 01-01-2010 23-09-2010 20-09-2011 20-03-2012 31-05-2012 29-06-2012	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012	
34 35 36 37 38 39 40 39 40 41 42 44 44 45	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Abdul Waheed Khan Yismail Babo Faiz Muhammad Muhammad Idrees Muhammad Idrees Sohail Anjum Mamrez Khan	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher Five Watcher F/W Chowkidar Chowkidar Chowkidar Naib Qasid	FA Matric BBA (hons) F.A Matric D.Com Matric Matric Matric Matric Matric F.A	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-08455902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621451-0	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983	Mardan Peshawar Manschra Dir Lower Swabi Peshawar Peshawar Peshawar Swat Manschra	09-12-2009 15-12-2009 01-01-2010 01-02-2010 23-09-2010 20-09-2011 20-03-2012 31-05-2012 29-06-2012 29-06-2012 22-10-2013	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-05-1987 23-09-2010 23-10-2013 01-10-2013 17-02-2015 29-06-2012 22-10-2013	
34 35 36 37 38 39 40 41 42 43 44 43 44 45	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Addul Waheed Khan Vismail Babo Faiz Muhammad Idrees Muhammad Idrees Muhammad Races Sohail Anjum Mamroz Khan Bilaj	Naib Qasid Naib Qasid Chowkidar Field Watcher Ff/W Chowkidar F/W Chowkidar Chowkidar Naib Qasid Field Watcher Chowkidar	FA Matric BBA (hons) F.A Matric O.Com Matric Matric Matric F.A Matric F.A Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-084/5902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-8172420-5	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985	Mardan Peshawar Manschra Dir Cower Swrabi Peshawar Nowshera Peshawar Swat	09-12-2009 15-12-2009 01-01-2010 01-02-2010 23-09-2011 20-09-2011 20-09-2011 20-09-2012 29-06-2012 22-10-2013 23-10-2013 23-10-2013	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 22-10-2013 22-10-2013	
34 35 36 37 38 39 40 41 41 42 43 44 45	Hayat Khan Attà ur Rahman Abdul Malik Ajmal Hussain Muhammad Nacem Abdul Waheed Khan Vismail Babo Faiz Muhammad Muhammad Idrees Muhammad Races Sohail Anjum Mamroz Khan Bilaj Fazal Mohammad	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Naib Qasid Field Watcher Chowkidar	FA Matric BBA (hons) FA Matric D.Com Matric Matric Matric F.A Matric F.A Matric F.A Matric F.A	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-084/5902-1 16202-9036671-1 17301-3417825-9 17201-8971147-1 17301-8175950-3 15602-0483035-1 13503-8172420-5 16201-5044305-7	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-04-1977 03-04-1983 16-01-1979 03-04-1980 03-04-1983 10-03-1985 10-03-1985	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar r Swat Mansehra Mansehra Kohat Swabi	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 20-03-2012 31-05-2012 22-10-2013 22-10-2013 22-10-2013 01-01-2014	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 22-10-2013 23-10-2013 01-01-2014	
34           35           36           37           38           39           40           41           42           43           44           45           46           47	Hayat Khan     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     Vismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Idrees     Sohail Anjum     Mammaz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar	FA Matric BBA (hons) F.A Matric D.Com Matric Matric Matric Matric F.A Metric F.A Metric F.A Metric F.A	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-8172420-5 16201-5044305.7 14301-1970753-3 15302-6517191-9	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985 01-01-1994 13-06-1978	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar Swat Mansehra Kohat Swabi Swabi	09-12-2009 15-12-2009 01-01-2010 01-02-2010 23-09-2011 20-09-2011 20-09-2011 20-09-2012 29-06-2012 22-10-2013 23-10-2013 23-10-2013	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 22-10-2013 23-10-2013 01-01-2014 06-01-2014	
34.           35.           36.           37.           38.           39.           40.           41.           42.           43.           44.           45.           46.           47.           48.           49.           50.	<ul> <li>Hayat Khan</li> <li>Attà ur Rahman</li> <li>Abdul Malik</li> <li>Ajmal Hussain</li> <li>Muhammad Nacem</li> <li>Abdul Waheed Khan</li> <li>'Ismail Babo</li> <li>Faiz Muhammad</li> <li>Fazal Mohammad</li> <li>Ramad Said Nawab</li> <li>Fazal Mohammad</li> </ul>	Naib Qasid Naib Qasid Chowkidar Field Watcher Ff/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar	FA Matric BBA (hons) F.A Matric O.Corn Matric Matric Matric Matric F.A Matric F.A Matric F.A Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404560-3 15302-0845902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-8172420-5 - 16201-5044303-7 14301-1979753-3 15302-6517191-9 15102-0350775-7	$\begin{array}{c} 12.01.1983\\ 10.01.1979\\ 05.02.1991\\ 07.03.1989\\ 10.04.1977\\ 25.10.1984\\ 03.03.1983\\ 16.01.1979\\ 03.04.1983\\ 16.01.1979\\ 03.04.1983\\ 10.02.1982\\ 11.04.1983\\ 10.03.1985\\ 01.01.1994\\ 13.06.1978\\ 04.04.1995\\ \end{array}$	Mardan Peshawar Manschra Dir Lower Swabi Peshawar Nowshera Peshawar / Swai Manschra Manschra Kohat Swabi Maiskand Dir Lower	09-12-2009 15-12-2009 01-01-2010 01-02-2010 23-09-2011 20-09-2011 20-09-2011 29-06-2012 22-10-2013 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-03-2014 15-09-2014	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 23-10-2013 01-01-2014 06-01-2014 06-01-2014 15-09-2014	
34           35           36           37           38           39           40           41           42           43           44           45           46           47           48           49           50           51	<ul> <li>Hayat Khan</li> <li>Attà ur Rahman</li> <li>Abdul Malik</li> <li>Ajmal Hussain</li> <li>Muhammad Nacem</li> <li>Abdul Waheed Khan</li> <li>'Ismail Babo</li> <li>Faiz Muhammad</li> <li>Fazi Muhammad Idrees</li> <li>Muhammad Idrees</li> <li>Muhammad Races</li> <li>Sohail Anjum</li> <li>Mamroz Khan</li> <li>Bilal</li> <li>Fazal Mohammad</li> <li>Nadeem Ahmad</li> <li>Sadi Nawab</li> <li>Fazal Haq</li> <li>Shamsul Hassan</li> </ul>	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar F/W Chowkidar Chowkidar Naib Qasid Field Watcher Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar	FA Matric BBA (hons) FA Matric O.Com Matric Matric Matric F.A Matric F.A Matric F.A Matric F.A Matric B.A	16101-9527502-1 17301-1612294-7 13504-3404160-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0631453-9 13503-8172420-5 	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985 01-01-1994 13-06-1978 04-04-1995 03-03-1983	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar / Swat Mansehra Mansehra Mansehra Swabi Malakand Dir Lower Buner	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 20-03-2012 31-05-2012 22-10-2013 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 05-01-2014 05-01-2014	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 23-10-2014 06-01-2014 06-01-2014 06-02-2014 15-09-2014 25-11-2015	
34           35           36           37           38           39           40           41           42           43           44           45           46           47           48           49           50           51           52	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Idrees     Sohail Anjum     Marraz Khan     Bilal     Fazal Mohammad     Said Nawab     Fazal Hag     Shamsul Hassan     S.Muneer Ali	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Naib Qasid Field Watcher Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar	FA Matric BBA (hons) FA Matric D.Com Matric Matric Matric F.A Matric F.A Matric F.A Matric F.A Matric B.A Metric Matric Matric Matric Matric E.A Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matr	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-084/5902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8175950-3 15602-0483035-1 13503-621453-9 13503-621453-9 16201-5044305-7 14301-1970753-3 15302-6517191-9 15102-0350775-7 15306-3685480-9 - 15201-6816377-3.	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985 01-01-1994 13-06-1978 04-04-1995 03-03-1994	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar Peshawar Swat Mansehra Mansehra Kohat Swabi Maiakand Dir Lower Buner	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2010 20-09-2011 20-09-2011 20-09-2012 21-05-2012 22-10-2013 23-10-2014 06-01-2014 05-01-2014 02-10-2014 02-10-2014 26-11-2014	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 22-10-2013 01-01-2014 06-01-2014 06-03-2014 06-03-2014 06-03-2014 25-11-2015 26-11-2015	
34           35           36           37           38           39           40           42           43           44           45           46           47           48           49           50           51           52           53	Hayat Khan     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Addul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Mamraz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     Sahuneer Ali     Saifur Rehman	Naib Qasid Naib Qasid Chowkidar Field Watcher Fftw Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar	FA Matric BBA (hons) FA Matric O.Com Matric Matric Matric F.A Metric F.A Metric F.A Metric B.A EA Matric B.A EA Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-0621453-9 14301-1979753-3 15302-6517191-9 15302-6517191-9 15302-365177191-9 15302-365177191-9 15302-365177191-9 15302-3651775-7 15306-3685480-9 15201-0876166-1	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-01-1994 13-06-1978 04-04-1995 03-03-1994 03-03-1994 03-03-1994	Mardan Peshawar Mansehra Dfr Cower Swabi Peshawar Nowshera Peshawar /Swai Mansehra Mansehra Kohat Swabi Malakand Dir Lower Dir Lower Dir Lower Chitral	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 20-09-2011 20-09-2011 20-09-2012 29-06-2012 29-06-2012 22-10-2013 23-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 17-02-2015 22-10-2013 23-10-2013 23-10-2014 06-01-2014 06-01-2014 06-02-2014 15-09-2014 26-11-2015 26-11-2015	
34           35           36           37           38           39           40           41           42           43           44           45           46           47           48           49           50           51           52	<ul> <li>Hayat Khan</li> <li>Attà ur Rahman</li> <li>Abdul Malik</li> <li>Ajmal Hussain</li> <li>Muhammad Nacem</li> <li>Abdul Waheed Khan</li> <li>'Ismail Babo</li> <li>Faiz Muhammad</li> <li>Faiz Muhammad Idrees</li> <li>Muhammad Races</li> <li>Sohail Anjum</li> <li>Mamroz Khan</li> <li>Bilal</li> <li>Fazal Mohammad</li> <li>Shamsul Hassan</li> <li>Shamsul Hassan</li> <li>Salfur Rehman</li> <li>Muhammad Ostian</li> </ul>	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar	FA Matric BBA (hons) FA Matric D.Com Matric Matric Matric F.A Matric F.A Matric F.A Matric H.A E.A Matric B.A E.A Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-0621453-9 13503-8172420-5 16201-5044305-7 14301-1979753-3 15302-6517191-9 15302-6517191-9 15302-365480-9 15201-6816377-3 15201-0876166-1 15201-1507009-1	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985 01-01-1994 13-06-1978 04-04-1995 03-03-1994 02-05-1983 03-03-1994 02-02-1993 17-10-1976	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar Peshawar Swat Mansehra Kohat Swabi Malakand Dir Lower Buner Dir Lower Chirral	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2010 20-09-2011 20-03-2012 31-05-2012 22-10-2013 22-10-2013 22-10-2014 06-01-2014 06-01-2014 06-01-2014 02-10-2014 02-10-2014 02-10-2014 02-10-2014 01-04-2015 01-04-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 23-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2014 25-11-2015 26-11-2015 01-04-2015	
34           35           36           37           38           39           40           42           43           44           45           46           47           48           49           50           51           52           53           54           55           56	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Idrees     Sohail Anjum     Mammad Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     Sidur Rahman     Muhammad Osman     Muhammad Osman     Mohammad     Shafi Ultah	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Naib Qasid Field Watcher Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar F/W F/W Naib Qasid Chowkidar Field Watcher	FA Matric BBA (hons) F.A Matric O.Com Matric Matric Matric Matric F.A Metric F.A Metric F.A Metric B.A B.A B.A B.A Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3471147-1 17301-8176950-3 15602-0483035-1 13503-8172420-5 13503-8172420-5 14301-1970733-3 15302-6517191-9 15302-365480-9 15201-6816377-3. 15201-0876166-1 15201-1507009-1 15201-507402-1 15201-507402-1 15201-1507009-1 15201-5545423-3	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1983 16-01-1979 03-04-1983 01-01-1978 01-01-1994 13-06-1978 04-04-1995 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-02-1993 17-10-1976 -	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar Peshawar Peshawar Swabi Mansehra Kohat Swabi Mansehra Kohat Swabi Dir Lower Buner Dir Lower Chitral Chitral	09-12-2009 15-12-2009 01-01-2010 21-09-2010 22-09-2011 20-09-2011 20-09-2011 20-09-2011 20-09-2012 22-10-2013 23-10-2013 23-10-2014 06-01-2014 06-03-2014 05-03-2014 02-10-2014 02-10-2014 01-04-2015 01-04-2015 01-04-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 17-02-2015 22-10-2013 23-10-2013 23-10-2014 06-01-2014 06-01-2014 06-02-2014 15-09-2014 26-11-2015 26-11-2015	
34           35           36           37           38           39           40           41           42           43           44           45           46           47           48           49           50           51           52           53           54           55           56           57	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Addul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Mamraz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     S.Muneer Ali     Saifur Rehman     Muhammad Osman     Roohullah     Shafi Ullah     Asad Ullah	Naib Qasid Naib Qasid Chowkidar Field Watcher F/W Chowkidar F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher	FA Matric BBA (hons) F.A Matric O.Com Matric Matric Matric Matric F.A Matric F.A Matric F.A Matric B.A E.A Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404160-3 15302-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 1500-38172420-5 	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-04-1977 25-10-1984 03-04-1983 16-01-1979 03-04-1983 10-03-1985 01-01-1994 13-06-1978 03-03-1984 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 15-10-1976 - 01-01-1991 04-04-1976 -	Mardan Peshawar Mansehra Dir Cower Swabi Peshawar Nowshera Peshawar Swati Mansehra Mansehra Kahat Swabi Malakand Dir Lower Dir Lower Dir Lower Chitral Chitral	09-12-2009 15-12-2009 01-01-2010 22-09-2010 22-09-2011 20-09-2011 20-09-2011 20-09-2012 29-06-2012 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-03-2014 02-10-2014 01-04-2015 01-04-2015 01-04-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2015 29-06-2012 23-10-2013 01-01-2014 06-01-2014 06-01-2014 05-01-2014 25-11-2015 26-11-2015 01-04-2015 01-04-2015 01-04-2015	
34           35           36           37           38           39           40.           41.           42.           43.           44.           45.           46.           47.           48.           49.           50.           51.           52.           53.           54.           55.           56.           57.           58.	Hayat Khan     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     Jismail Babo     Faiz Muhammad Nacem     Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Mamroz Khan     Bilal     Fazal Mohammad     Shair Anjum     Shamsul Hassan     S.Muncer Ali     Saifur Rehman     Muhammad Osman     Roohullah     Shafi Ultah     Asad Ultah     Asad Ultah	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher	FA Matric BBA (hons) FA Matric O.Com Matric Matric Matric F.A Metric F.A Metric F.A Metric B.A EA Metric B.A EA Matric Matric Matric Matric B.A EA Matric B.A EA Matric B.A EA Matric B.A EA Matric B.A	16101-9527502-1 17301-1612294-7 13504-3404160-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-8172420-5 16201-5044305-7 14301-1970751-3 15302-6517191-9 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-7 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-6816377-3. 15201-1507009-1 15202-5795427-7 15704-564815-3. 15701-2291214-1	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1983 16-01-1978 03-04-1985 01-01-1994 13-06-1978 04-04-1995 01-01-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 03-04-1990 03-04-1990 03-04-1990 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-04-1985 03-03-1994 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-194 03-03-194 03-03-194 03-03-194 03-03-194 03-03-194	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar Peshawar Swat Mansehra Mansehra Kohat Swabi Maiakand Dir Lower Chitral Chitral Chitral Dir Upper Dir Upper Dir Upper	09-12-2009 15-12-2009 01-01-2010 22-09-2010 20-09-2010 20-09-2011 20-03-2012 21-05-2012 22-10-2013 22-10-2013 22-10-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 02-10-2014 26-11-2014 01-04-2015 01-04-2015 01-04-2015 01-04-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 23-10-2013 23-10-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2014 25-11-2015 26-01-2015 01-04-2015 01-04-2015 01-04-2015 16-02-2015	
34           35.           36.           37.           38.           39.           41.           42.           43.           44.           45.           46.           47.           48.           49.           50.           51.           52.           53.           54.           55.           56.           57.           58.           59.	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     'Ismail Babo     Faiz Muhammad Idrees     Muhammad Idrees     Muhammad Idrees     Sohail Anjum     Mammad Khan     Bilal     Fazal Mohammad     Said Nawab     Fazal Hog     Shamsul Hassan     Si.Muneer Ali     Saifur Rehman     Muhammad Osman     Roohullah     Shafi Ullah     Asad Ullah     Asad Ali     Zakirullah	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher	FA Matric BBA (hons) FA Matric D.Com Matric Matric Matric F.A Matric F.A Matric F.A Matric F.A Matric B.A E.A Matric Matric B.A Matric Matric Matric B.A Matric Matric Matric Matric Matric B.A Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric Matric	16101-9527502-1 17301-1612294-7 13504-3404160-3 15302-0845902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0631453-9 13503-8172420-5 	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985 01-01-1994 13-06-1978 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-1994 03-03-	Mardan Peshawar Mansehra Dir Lower Swabi Peshawar Nowshera Peshawar Peshawar Swat Mansehra Mansehra Kohat Swabi Maiakand Dir Lower Chitral Chitral Chitral Dir Upper Dir Upper Dir Upper	09-12-2009 15-12-2009 01-01-2010 01-01-2010 22-09-2010 20-09-2011 20-03-2012 21-05-2012 22-10-2013 22-10-2013 22-10-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 23-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2015 26-11-2015 26-11-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015	
34           35           36           37           38           39           41           42           43           44           45           46           47           48           49           50           51           52           53           54           55           57           58           59           60	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Addul Waheed Khan     'Ismail Babo     Faiz Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Marmaz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     S.Munoer Ali     Saifur Rehman     Muhammad Osman     Rochullah     Asad Ullah     Asad Ali     Zakirullah     Taj Nabi	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher	FA Matric BBA (hons) F.A Matric O.Com Matric Matric Matric Matric F.A Metric F.A Metric B.A Metric Matric B.A Matric Matric B.A Matric Matric B.A Matric Matric B.A Matric Matric F.A Matric F.A Metric B.A Matric Matric F.A F.A F.A F.A F.A F.A F.A	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 15202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-8172420-5 16201-5044305-7 14301-1979753-3 15302-6517191-9 15302-6517191-9 15302-6517191-9 15302-365480-9 15201-6876166-1 15201-1507009-1 15201-25795427-7 15704-2648153-3 15701-202316-9 15701-2195922-1 13502-6816222-7	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 10-03-1985 01-01-1994 13-06-1978 04-04-1995 03-03-1994 02-02-1993 17-10-1976 - 01-01-1991 10-04-1990 03-02-1992 20-04-1997 04-03-1991	Mardan Peshawar Mansehra Dir Cower Swabi Peshawar Peshawar / Swati Mansehra Mansehra Mansehra Kohat Swabi Malakand Dir Lower Buner Dir Lower Buner Dir Lower Chirral Chirral Dir Upper Dir Upper Dir Upper Dir Upper Torghar	09-12-2009 15-12-2009 01-01-2010 22-09-2010 22-09-2010 20-09-2011 20-09-2012 21-02-2012 22-00-2012 22-10-2013 23-10-2013 23-10-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 17-02-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 01-04-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 04-06-2015 04-06-2015	
34           35           36           37           38           39           41           42           43           44           45           46           47           48           49           50           51           52           53           54           55           56           57           58           59	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Addul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Mamraz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     S.Muneer Ali     Saifur Rehman     Muhammad Osman     Roohullah     Shafi Ullah     Asad Ali     Zakirullah     Taj Nabi     Gul Malik Khan	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher Field Watcher	FA         Matric         BBA (hons)         FA         Matric         O.Com         Matric         B.A         EA         Matric         Matric         Matric         Matric         Matric         Matric         B.A         Matric         Matric         F.A         Matric         B.A         Matric         F.A         Matric         F.A         Matric         F.A         Matric         F.A         Matric         Matric         F.A         Matric         F.A         Matric         Matric         F.A         Matric         F.A         Matric <td>16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-8172420-5 14301-1970753-3 15302-6517191-9 15302-6517191-9 15302-6517191-9 15302-6517191-9 15302-6517191-9 15201-1970709-1 15201-1970709-1 15201-1970709-1 15201-1970709-1 15201-1970709-1 15201-1970709-1 15701-2291214-3 15701-0602316-9 15701-2291214-3 15701-26816222-7 42101-8774454-3</td> <td>12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 01-01-1979 03-04-1985 01-01-1994 02-05-1983 17-10-1994 02-05-1983 17-10-1995 01-01-1991 10-04-1990 08-02-1992 20-04-1997 04-01-1989</td> <td>Mardan Peshawar Mansehra Dir Cower Swabi Peshawar Nowshera Peshawar Swabi Mansehra Mansehra Mansehra Mansehra Swabi Malakand Dir Lower Buner Dir Lower Dir Lower Chiral Chiral Chiral Dir Upper Dir Upper Dir Upper Dir Upper Torghar</td> <td>09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 22-09-2011 22-09-2011 22-09-2012 22-10-2012 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015</td> <td>01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015</td> <td></td>	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 13503-0621453-9 13503-8172420-5 14301-1970753-3 15302-6517191-9 15302-6517191-9 15302-6517191-9 15302-6517191-9 15302-6517191-9 15201-1970709-1 15201-1970709-1 15201-1970709-1 15201-1970709-1 15201-1970709-1 15201-1970709-1 15701-2291214-3 15701-0602316-9 15701-2291214-3 15701-26816222-7 42101-8774454-3	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 01-01-1979 03-04-1985 01-01-1994 02-05-1983 17-10-1994 02-05-1983 17-10-1995 01-01-1991 10-04-1990 08-02-1992 20-04-1997 04-01-1989	Mardan Peshawar Mansehra Dir Cower Swabi Peshawar Nowshera Peshawar Swabi Mansehra Mansehra Mansehra Mansehra Swabi Malakand Dir Lower Buner Dir Lower Dir Lower Chiral Chiral Chiral Dir Upper Dir Upper Dir Upper Dir Upper Torghar	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 22-09-2011 22-09-2011 22-09-2012 22-10-2012 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015	
34           35           36           37           38           39           40           41           42           43           44           45           46           47           48           50           51           52           53           54           55           56           57           58           59           60           61	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     Vismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Idrees     Sohail Anjum     Mammaz Khan     Bilal     Fazal Mohammad     Said Nawab     Fazal Hog     Shamsul Hassan     S.Muncer Ali     Saifur Rehman     Muhammad Osman     Reohullah     Shafi Ullah     Asad Ali     Zakirullah     Taj Nabi     Gui Malik Khan     Anwar Ali	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher	FA         Matric         BBA (hons)         FA         Matric         D.Com         Matric         BA         Matric         Matric         Matric         Matric         Matric         Matric         BA         Matric         F.A	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 15022-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176550-3 15602-0481035-1 13503-0621453-9 13503-8172420-5 14301-979753-3 15306-3685480-9 15201-5014305.7 15306-3685480-9 15201-6816377-3 15306-3685480-9 15201-577554-3 15201-6816377-3 15201-6816377-3 15701-2691214-3 15701-299522-1 13502-6816222.7 42101-8774454-3 13601-050968-5 16202-0861078.7	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1980 05-02-1982 11-04-1983 01-01-1994 13-06-1978 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 15-04-1990 15-04-1994	Mardan Peshawar Manschra Dir Lower Swabi Peshawar Nowshera Nowshera Peshawar / Swat Manschra Manschra Kohat Swabi Maiakand Dir Lower Dir Lower Dir Lower Dir Lower Dir Lower Dir Lower Dir Lower Dir Upper Dir Upper Dir Upper Dir Upper Dir Upper Torghar Torghar	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2010 20-09-2011 20-09-2011 20-09-2012 22-10-2012 22-10-2013 23-10-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 15-09-2014 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 04-06-2015 04-06-2015 04-06-2015 04-06-2015 04-06-2015 01-07-2015 01-07-2015 01-07-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2014 01-04-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 03-08-2015	
34           35           36           37           38           39           41           42           43           44           45           46           47           48           49           50           51           52           53           54           55           56           57           58           59           60           61           62           63           64	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Addul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Marmaz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     S.Muneer Ahi     Sail Nawab     Fazal Hag     Shamsul Hassan     Muhammad Osman     Rochullah     Asad Ali     Zakirullah     Taj Nabi     Gul Malik Khan     Anwar Ali     Raj Mohammad     Muhammad     Muhammad     Muhammad	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher	FA         Matric         BBA (hons)         F.A         Matric         O.Corn         Matric         B.A         B.A         Matric         F.A         F.A         F.A         F.A         F.A         F.A         F.A         F.A <td>16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 1303-0621453-9 13503-8172420-5 13503-8172420-5 14301-1970733-3 15302-6517191-9 15302-6517191-9 15302-6517191-9 15201-05763648-9 15201-1507009-1 15201-50740548153-3 15701-0602316-9 15701-2991214-3 15701-295922-1 13502-6816222-7 42101-8774454-3 13601-0500968-5 16202-0851078-7 1502-7462757-3</td> <td>12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1983 16-01-1979 03-04-1985 01-01-1994 13-06-1978 03-03-1985 03-03-1983 03-03-1984 03-03-1984 03-03-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1991 04-03-1997 04-03-1991 04-03-1991 04-03-1994 15-04-1994 15-04-1983</td> <td>Mardan Peshawar Mansehra Dfr Cower Swabi Peshawar Nowshera Peshawar Swati Mansehra Kohat Swabi Malakand Dir Lower Dir Lower Dir Lower Chirtal Chirtal Chirtal Dir Upper Dir Upper Dir Upper Dir Upper Torghar Torghar</td> <td>09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 20-09-2011 20-09-2011 20-09-2012 29-06-2012 22-10-2013 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-03-2014 02-10-2014 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 31-07-2015 31-07-2015 31-07-2015 01-01-2015</td> <td>01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015</td> <td></td>	16101-9527502-1 17301-1612294-7 13504-3404360-3 15302-0845902-1 16202-9036671-1 17301-3417825-9 17201-3971147-1 17301-8176950-3 15602-0483035-1 1303-0621453-9 13503-8172420-5 13503-8172420-5 14301-1970733-3 15302-6517191-9 15302-6517191-9 15302-6517191-9 15201-05763648-9 15201-1507009-1 15201-50740548153-3 15701-0602316-9 15701-2991214-3 15701-295922-1 13502-6816222-7 42101-8774454-3 13601-0500968-5 16202-0851078-7 1502-7462757-3	12-01-1983 10-01-1979 05-02-1991 07-03-1989 10-04-1977 25-10-1984 03-03-1983 16-01-1979 03-04-1983 16-01-1979 03-04-1985 01-01-1994 13-06-1978 03-03-1985 03-03-1983 03-03-1984 03-03-1984 03-03-1983 03-03-1994 02-05-1983 03-03-1994 02-05-1983 03-03-1991 04-03-1997 04-03-1991 04-03-1991 04-03-1994 15-04-1994 15-04-1983	Mardan Peshawar Mansehra Dfr Cower Swabi Peshawar Nowshera Peshawar Swati Mansehra Kohat Swabi Malakand Dir Lower Dir Lower Dir Lower Chirtal Chirtal Chirtal Dir Upper Dir Upper Dir Upper Dir Upper Torghar Torghar	09-12-2009 15-12-2009 01-01-2010 01-02-2010 22-09-2011 20-09-2011 20-09-2011 20-09-2012 29-06-2012 22-10-2013 22-10-2013 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-03-2014 02-10-2014 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 16-02-2015 31-07-2015 31-07-2015 31-07-2015 01-01-2015	01-12-2010 15-12-2009 14-01-2010 23-05-1987 23-09-2010 23-10-2018 01-10-2013 17-02-2013 29-06-2012 22-10-2013 01-01-2014 06-01-2014 06-01-2014 06-01-2014 06-01-2014 25-11-2015 01-04-2015 01-04-2015 01-04-2015 01-04-2015 16-02-2015 16-02-2015 16-02-2015	
34           35           36           37           38           39           40           41           42           43           44           45           46           47           48           49           30           51           52           53           54           55           56           56           57           58           59           60           61           62           63           64	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Addul Waheed Khan     'Ismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Races     Sohail Anjum     Mamraz Khan     Bilal     Fazal Mohammad     Nadeem Ahmad     Said Nawab     Fazal Hag     Shamsul Hassan     S.Muneer Ali     Saifur Rehman     Muhammad Osman     Roohullah     Shafi Ullah     Asad Ali     Zakirullah     Taj Nabi     Gul Malik Khan     Anwar Ali     Raj Mohammad     Muhammad     Muhammad	Naib Qasid Naib Qasid Chowkidar Field Watcher 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34           35.           36.           37.           38.           39.           41.           42.           43.           44.           45.           46.           47.           48.           49.           50.           51.           52.           53.           54.           55.           56.           57.           58.           59.           60.           61.           62.           63.           64.           65.           66.	Hayat Khan     Attà ur Rahman     Attà ur Rahman     Abdul Malik     Ajmal Hussain     Muhammad Nacem     Abdul Waheed Khan     Vismail Babo     Faiz Muhammad     Muhammad Idrees     Muhammad Idrees     Muhammad Idrees     Sohail Anjum     Mammaz Khan     Bilal     Fazal Mohammad     Said Nawab     Fazal Hog     Shamsul Hassan     S.Muneer Ali     Saifur Rehman     Muhammad Osman     Roohullah     Shafi Ullah     Asad Ali     Zakirullah     Taj Nabi     Gui Malik Khan     Anwar Ali     Raj Mohammad     Sheryar Ahmad	Naib Qasid Naib Qasid Chowkidar Field Watcher Field Watcher F/W Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Chowkidar Field Watcher Field Watcher	FA         Matric         BBA (hons)         FA         Matric         O.Com         Matric         BA         EA         Matric         Matric         Matric         Matric         Matric         Matric         B.A         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# STAFF POSITION OF SOIL & WATER CONSERVATION WING OF AGRICULTURE DEPARTMENT

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Dy. Director Monitoring BS018	2	0	0	0	0	0	0	0	Ō	0	Ő	0	0	0	0	0	0	0	0	0	0	0	0		0	00	00	00	00		00	00	3
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SCO Tech/Planning BS-17	04	00	00	00	00	00	00	00	00	00	00	00	00	00	0	00	00	00	00	00	-00	00	00	00	00	00		- 00		1			24
<u>S C A (BPS017)</u>	00	1	1	1	ī	2	1	2	1	1	1	}		1	<u> </u>	Ť		1					1		1	1			00	00	00	00	4
Asstt. Soil Survey Research Officer BS017	6	00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	00	00	00	00	-00	00	00	33
A A. Officer (BPS017)	1	00	00	00	00	00	00	00	00	00	00	00	00	00	0	- 00	00	00	- 00	- 00					-								
Officer Supdi (BPS017)	3	00	00	00	00	00	00	00	00	00	00	00	00	00	0	00	00	00	00 00	00	00	00	00	00	00	00	_00	00	00	00	00	00	1
Admin. Officer (BS016)	2	00	00	00	00	00	00	00	00	00	00	00	00	00	0	00	00	00	00	00	00	00	00	00	0 0	00	00	1 00	1 00	00	00	00	10
Assistant, (BS016)	4	1	1		- i		- <u>00</u>			-	00	1	00		- 1	- 00		00															2
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Computer Operator BPS016	3	00		00	00	00	00	00	00	00	00	00	00	00	0	00	00	00	00	00	00	00	00	00		00	00	00	00	00		•	1
GIS Analyst (BPS014)	1	00	00	00	00	00	00	00	00	00	00	00	<u></u> ეი	00		00	00	00	00	00	00		00	00	00 00	00	00	- 00 - 10	$-\frac{00}{0}$	6	00	00 U	3
Senior Clerk (BPS014)	2	1	1	1	Ωų			1		1	1				1			1							<u>(11)</u>	(H)		00		00		00	
Stenographert/II (BS014)	1	00	00	00	0Ù	00	00	00	00	00	00	00	00	00	0	00	00	00	00	- 00					1								25
Field Supervisor (BS014)	0	0	00	00	00	00	00	00		0	00	00	0	00	0	00	00	00	00	00	00	00	00	00	00	0	0		0	0	0	0	1
Soil Conservation Inspector (BPS011)	0	1	1	1	00	00	00	1 4	00	i	1	00	00	1	0	00	00	00	00		- 0	0	00			00	00 00	00	00 00	00	00	00	4
Junior Clerk (BPS011)	4	1 -	-1-	~1-			1	1		1		-		1																			
Sub-Engineer (PBS-11)	0	0 -		-0~	0	0	0	0	0	<u>-1-</u>	0	0			0	0	1	0	1	_!_	00	1	00		1	1	1	1	1	1	<u> </u>	-1-	30
Field Asstt (BPS09)	0		····		2	2	2		<u> </u>		<u> </u>			0	0	0	0	0	0	0		0	0	_0	0			ᆜ		1	1	1	7
Senior Auditor (BPS08)	1	00	- 00				·	2		2		2	2	3		2	2	3	2	3	2	1	2	2	3	2	2	2	2	2	2	2	59
Tracer BS007	$\frac{1}{2}$	00	00	00	00	00	00	00	00	_00	00	00	00	00	0	00	0Q	00	00	00	00	00	00	00	00	00	00	00	00	00	00	00	
Store Keeper (BPS06)		00	00	00	-00	0	0	0	0	0	0	0	0	0	00	0	0	. 0	0	0	0	0	0	0	0	00	00	00	00	00	00	00	2
Jeep Driver (B06)	6	-00	1	. 00	- 00	00	00	00	00	00	00	00	00	00	0	00	00	00	00	00	0	0	_00	00	00	00	00	00	00	00	00	00	1
Field Watcher (BPS03)	0	00	4	3	6	3	2		4								1					1	1	1	1	1	_1	1	t	Ι	_	1	37
Khalasi BS003	02	00	0	$\frac{3}{6}$	0	- 0	$\frac{2}{0}$	6		7	3	5	00	9	2	2	_6	6	8	6	_4	2	_4	7	5	4	4	4	4	4	4	4	132
Naib Qasid (B03)			<u>.</u>	<u></u>	· ·	<u> </u>		0	0	0	0	0	0	0	0		0		0	0		0	0	0	0	00	00	00	00	00	00	00	2
Chowkidar (B03)	6	0							1	1	1	1	<u> </u>	1	1	_!	I	1	1	1	1	I	<u> </u>	1	1	1	I	1	- I - [	1	1	1	37
Sweeper (B03)		00	1	00	2	2	1	3	2	2	1	2	00	3	2		2	2	1	2	1	1	ī	2	1	2	2	2	2	2	2	2	53
	<u>-</u>		00		00	00	00	00	00	00	<u>(</u> 0	00	00	00	_0	00	00		00	00	00	00	00	00	00	00	00	00	00	00	00	00	2
Total:	65	9	14	13	16	15	11	20	15	19	12	16	8	23	11	10	18	17	18	19	12	10	.13	20	18	15	15	15	15	15	15	15	527

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Soil Conservation Rhyber Pakhtankhing Misling

Service Appeal No.6338/2020

Govt. of Khyber Pakhtunkhwa & others. . . . **Respondents** 

# REJOINDER ON BEHALF OF APPELLANT

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# Respectfully Sheweth:

# Rejoinder to Preliminary Objections:

( .

Preliminary objections from 1 to 4 are flimsy one, appellant has the locus standi, no fact is concealed, and this Hon'ble Tribunal has the jurisdiction because the cause of action accrued within the jurisdiction of this Hon'ble Tribunal, and that's why matter was referred to the Tribunal by the Hon'ble Peshawar High Court, Peshawar.

# Rejoinder on Facts:

- 1. Para No.1 needs no rejoinder, being admitted.
- 2. Para No.2 needs no rejoinder, being admitted.
- 3. Para No.3 needs no rejoinder, being admitted.

1

Service Appeal No.6338/2020

#### VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . RESPONDENTS

# AFFIDAVIT

I. Muhammad Abbas, Naib Qasid (BPS-3), Soil & Water Conservation, Agricultural Department, Haripur, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

PESHAWAR Pakh

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.... APPLICANY/ APPELLANT mmad Abbas. . VERSUS eadin

Govt. of Khyber Pakhtunkhwa & others. . . . . Respondents accelerated to

#### week APPLICATION FOR EARLY HEARING FIXATION OF THE AND ABOVE TITLED CASE.

Respectfully Sheweth:

Rainort WITT

Service Appeal No. 6338/2020

In Re:

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1.

2.

That the above noted appeal alongwith application for interim relief is pending before this Hon'ble Tribunal, which is now fixed for 01.10.2020, in which case is admitted in preliminary hearing on previous date.

That the matter pertains to promotion of the applicant and in this respect interim relief is involved in the matter for restraining the respondents from further fresh appointments on the post of Junior Clerk. It is pertinent to mention here that the respondents have again advertised the said post through daily newspaper "Mashriq" dated 09.03.2020. (Copy of Advertisement IS ATTACHED).

That short question of law is involved in the matter and the date fixed i.e. 01.10.2020 is too far, and if the titled appeal is not fixed earlier, the very purpose of the same would become infructuous, hence this application.

That it is just, fair as well as in larger interest of justice that the titled appeal alongwith application for interim relief be fixed and heard at the earliest.

It is, therefore, prayed that on acceptance of this application, the titled appeal alongwith application for interim relief may kindly be fixed and heard at earliest, so as to secure interim relief.

Through

Applicant

**Shah Faisal Ilyas** Advocate High Court

Dated: 12.08.2020

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# AFFIDAVIT

It is stated on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

ΞĒ		DIREC	TORA	TE GENERAL SOIL & WATER	****	
Also a				ON KHYBER PAKHTUNKHWA		بشادر/اسلا)آبد
Ą	gric: lture Se	rvices Acade	my (ASA)	Campus, Opposite Islamia College, Jamruc F	Lond, Peshawar	
htt	p://soilcense	rvation.kp.go	ov.pk Erna	il:dgswckp@gmail.com, Ph:091-9424331, *a	x:091-5842912	Sunday 09 August / 2020
1	ľ S	ľΤU	A	ION VACAN	T	August / 2020
Apŗ	ications are	invited for a	the follow	ring vacant posts in the Directorate General	Soil and Wate	تصحيح ثيبندر نوئس
Lon	ervation K	hyber Pakh	tunkhwa	Peshawar. The requisite qualification an	d experience is	موالداشتهار ( نینڈرنوٹس ) نمبر INF(P)2609/20 (
S#.	Name of Post &	No. of Posts	Age	Minimum Education Qualification/	Domicile/	۔ تمام مینڈر دہندگان خیبر پخونخوا پروگرام پروکورمنٹ اتحارثی کے ساتھ
	BP\$.	Zone	ycar	Eligibility Criteria	Qucta	جر ڈہونالازی ہے۔ ۔ اد چنگ تاریخ برائے کوٹیشن 19گست کی بجائے بردز ہیر (10 اگست 2020 )
١.	Sub	07 (Merit/	20-32	At least 2nd class Secondary Schoo,	Khyoer	1 1
	Engineer (Civil)	Zones)		Certificate from a recognized Board with Three years Diploma of Associate	Pakhtunkhwa	إداباعه
	(BS-11)			Engineers (DAE), in 2nd Division from a		INF(P) د کتر محمد علی (شتر)
2		1		recognized institute in the relevant technology.		2609,20 میڈیکل سیرنٹنڈنٹ <sup>2609,20</sup>
2.	Junior Clerk	06 (Merit/ Zones)	18-30	i. At least second division Secondary School Certificate or equivalent	Khybe- Pakhtunkhwa	ڈی ایح کیو ہشپتال جارسدہ 🔄
	(BPS-11)			qualification from a recognized Bcard; and		المراجع
				ii. A speed of thirty words per minute in		ازمىي خاردىت الاستغارة بيجور ميست
3	Field	14 (Merit/	20-32	i. At least second class Secondary School	Khyber	مُسببت قبيل اسبامي خُنَّالي شبع
	Assistant (BPS-09)	Zones)		Certificate with (Science) from a recognized Board; and	Pakhtunkhwa	معربين فأربعه المراب المراجع المراجع والمراجع
ļ	•			ii. Three years Diploma of Field Assistant from a recognized Agriculture		توی کارڈیپ سفزکور درج ذیل خالی امیا می تح لیے درخواشی مطلوب جرب ایک کار میں اسان کا کار اس
			k-a	Training Institute.		بير المان
ote: hybe	er Preteren Fr Pachtunk	ce will be g hwa.	given to c	andidates belonging from the New y Me	rged Areas of	1. از المستنف (مد) ميش 10 ملى كان تك فيلم 02
ERA I.	General A		م سنال الم	adat to the second s		(BPS-7) جمح متحاد الم
	Ruy oci rau	ultunknwa.		admissible as per prescribed rules of G		
	produce MC	C at the thr	ne of inter	mment service may apply through proper view.		من ما المسط: 1. ما الاند آدی کار : کم سنرلامور کے ۲م درخواتی + CV جن ش تاریخ بیانش، ادمیکر
•	The reserve	a dnoraz Mil	li be obsei	will be counted from the last date of the active data per rules.		۲. ما مرتبه ای در یک مراد اور سر ۲۸ اوروا یک ۲۷ می ایس این به ۲۵ می ایس این این اور این ۲۰ مارد اور این ۲۰ مارد لقلی قابلیت ، کمپیوزائز و شاختی کا رو اور موجود و پاسپدرت ما تر تصویر یک 2 عدد جو
•	App cants	interested to	o apply fi	for each post.	bmit sepilrate	من مذا المير، عديق شد، بول بحد كمر كالدر لي كامل تعسيل ادرمو بال فون نبر
i	App.icants :	are advised t	to submit	their application forms within 15 days from	n the 'ssile of	اشتبار شائع بون کے بعد 30 دن کا غدر کماغان آر کی کار ذک سنز کے بام پر جوائم -
1. 1	Oni, cligio	e short liste	ed candid	eccived after due date will not be entertain lates will be called for written test after	ed., the complete	2 درج بالااسامين عم اك اماى رجرتى صوب لوچتان اورودمرى اساى رقمك ادر
i. I	incomplete :	oplication f	or applic	ation submitted with fake documents will I	e rejected at	-5-245
. 1	The compete	ent authority	has right	iss. to defer or cancel the recruitment process	at any stame	3 مرادی دیم مرکادی رفود تن ادارون ش کام کر ف وال طاز من تک کو سا
. 1	moone pho	in the test co	ons, cald	ulator or any other electronic dev ces	will not be	دد فواست ارسال کریں۔ ایڈ دانس موصول ہونے دالی درخواستوں برفور نیس کیا جائے گا۔
. i	Fee in not tr	ansferable of on will be en	r refundal	ble. hv hand		یا کمل در تا خرب موصول ہونے دالی درخواست مستر دکردی جا تمیں گی۔ میں مدینہ جدید مار ہو کی دالی درخواست مستر دکردی جا تمیں گی۔
i. 1	Application	form and c ps:/www.ats	other deta	ils may be download/obtained from the	ATS official	<ol> <li>عربی حد18 - 25 مال ب مرکی حد می مکیمت پاکستان کردانمک کے معالی 5 مال کی دنامہ دی جائے گی۔</li> </ol>
i. 1 ii. ,	At nitial sta	ige, copies o	of education	onal documents are not required to be attac	hed with the	لی رہا ہے۔ دن جانے ن ۔ 5۔ آری سے ریٹا ٹرڈا نراد کے لیے تمرکی عد 45سال ہے۔
i. 1 ii	hotographs.	iorm, exce	pt copy	of CNIC and two white back ground p	assport size	<ol> <li>۲۰ اول محرف ارد ارد مع المعالم المعال المعال المحمد المحم المحمد المحمد المحم المحمد المحمد المحمد المحمد المحمد المحمد المحمد المحمد المحم المحمد المحمد المحم المحمد المحم المحمد المحمد المحم المحمد المحمد المحم المحمد المحم المحمد المحمد المحمد المح</li></ol>
i. 1 ii /	anichicz, 1.	ie anità titic	eo in app	osited in any HBL & Silk Bank online c lication forms alongwith original deposit	elin escute	۵. الى بايد با ي مح م كين كون ف مرو ي من الم من من مل ك بارج
i. 1 ii / p  b	Cacil Mintre	10-days thre	ough any	courier service/ registered post after public Operations, Allied Testing Services (A	ation of this	أميدا.خراداكر_گ
i. 1 ii  		, Sector F-1	10/ I, Isla	mabad, for query or help dail#. 051-21535	77-9	7. المرود كيلية امل المداد مرتف كل ماتحد موالا فرك
i. ) ii. , /. , p . , p . , p . , p . , p . , p . , p . , p . , . ,	11 201 110-30	CTOR	GBN	ERAL SOIL AND WATER		8. مردو خواست کر تو ملغ -/200 رو ب کا تالل دایس ب آردر با بنک در ف مام
i. ) ii. , /. , p . , p . , p . , p . , p . , p . , p . , p . , . ,	11 201 110-30			SERVATION	- 1753	كماغ فت آرى كار ذيب مغرلا مورك نام مسلك موناج ب-
i. ) ii. , /. , p . , p . , p . , p . , p . , p . , p . , p . , . ,	11 201 110-30					
i. i. i. ii A A P P C A C A	11 201 110-30		1.5	L'ANTERUNK HAVA – L – -	F(P)	
i. i. i. ii A A P P C A C A	DIRI	K IN	BER	L'ANTERUNK HAVA – L – -	8/20	<u>كسم از گران آر</u> مسى كار ذيب مستنسكر مدر زيمان يوزران در كنين يون مُزمر: 042-36655079, 042-36655078

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Sefore The Khy	yber Pakhi	UNKHWA SI	ERVICE '	<b>TRIBUN</b>
SEFORE THE KHY	YBER PAKHI	UNKHWA SI	ERVICE	IRIDU

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# APPLICATION FOR EARLY HEARING

AND FIXATION OF THE ABOVE

## TITLED CASE.

## Respectfully Sheweth:

In Re:

 $\mathbf{2}.$ 

Service Appeal

1. That the above noted appeal alongwith application for interim relief is pending before this Hon'ble Tribunal, which is now fixed for 01.10.2020, in which case is admitted in preliminary hearing on previous date.

That the matter pertains to promotion of the applicant and in this respect interim relief is involved in the matter for restraining the respondents from further fresh appointments on the post of Junior Clerk. It is pertinent to mention here that the respondents have again advertised the said post through daily newspaper "Mashriq" dated 09.03.2020. (COPY OF ADVERTISEMENT IS ATTACHED).

- That short question of law is involved in the matter and the date fixed i.e. 01.10.2020 is too far, and if the titled appeal is not fixed earlier, the very purpose of the same would become infructuous, hence this application.
- 4. That it is just, fair as well as in larger interest of justice that the titled appeal alongwith application for interim relief be fixed and heard at the earliest.

It is, therefore, prayed that on acceptance of this application, the titled appeal alongwith application for interim relief may kindly be fixed and heard at earliest, so as to secure interim relief.

Through

Applicant

Dated: 12.08.2020

3.

Shah Faisal Ilyas Advocate High Court

# AFFIDAVIT

It is stated on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

In Re:

Service Appeal No.6338/2020



Muhammad Abbas. .... Applicant/Appellant Muhammad Abbas. ... Applicant/Appellant Wersus Govt. of Khyber Pakhtunkhwa & others. ... Respondents Kan and Abbas. ... Versus

# APPLICATION FOR EARLY HEARING AND FIXATION OF THE ABOVE TITLED

ou/01/2022

- That the above noted appeal alongwith application for interim relief is pending before this Hon'ble Tribunal, which is now fixed for 16.03.2022.
- 2. That the Service Appeal pertains to promotion of the applicant is pending and the case is complete in all respects and is ready for final arguments, but unluckily on previous date, the case was adjourned due to unavailability of D.B.
- 3. That the respondents have advertised the vacant posts of Junior Clerks and since the formation of the Department, no promotion has been carried out, despite the fact that the applicant is serving since 1996 (COPY OF ADVERTISEMENT IS ATTACHED).

That short question of law is involved in the matter and the date fixed i.e. 16.03.2022 is too far, and if the titled appeal is not fixed earlier, the very purpose of the same would become infructuous, hence this application.

That it is just, fair as well as in larger interest of justice that the titled appeal alongwith application for interim relief be fixed and heard at the earliest.

It is, therefore, prayed that on acceptance of this application, the titled appeal may kindly be fixed and heard at earliest, so as to decide the matter once for all.

Through

# Dated: 20.12.2021

## **Shah Faisal Ilyas** Advocate, Supreme Court

Applicant/Appellant

## AFFIDAVIT

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5.

It is stated on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

-a 12-21 ATT NOTARY F

## DEPONENT

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                                                            | Image: An intermediate in the second secon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 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| No. The reserved quotes will be observed as per rules. Applications revealed after their application forms within 15 days from the issue of this advertisement. Applications revealed after their application forms within 15 days from the issue of this advertisement. Applications rot applications or application submitted with fate documents will be rejected at any stage of the rerultment process.  Mil: The competent authority has right to defer or cancel the recultiment process at any stage.  Whether phones, weapons, calculated or any other electronic devices will not be permissible in the test contents.  Feel innot transformed or my other electronic devices will not be permissible in the test contents.  Feel innot transformed or regulated by hard.  A Replication or any other electronic devices will not be permissible in the test contents.  Feel innot transformed by and down while be advertisement to require the battacted will be application form except COV OTNO and the write back ground passport size photographs.  Permissible and the analysis down advertise advertisement will be application form except (ATS), 1714, Street No. 36, Sector F-1011, Islamabad, for query on bip Deil 051-2135577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-2135577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-213577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-213577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-213577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-213577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-213577.9.   PERMISSION That Scheed P-1011, Islamabad, for query on bip Deil 051-213577.9.   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The Manager Operations, Allied Testing Services are not exposed in any HEL & SiLe Back within 15-darys through any counter serviced registered post after publication of this advertisement to: The Manager Operations, Allied Testing Services (ATS), 171-G, Street No. 36, Sector F-10/1, Islamabad, forquery on help Daile, 051-2153577-9. <b>TETISIDEZI DIRECTOR GENERAL</b> SOIL AND WATER CONSERVATION, KHYBER PAKHTUNKHWA PESHAWAR <b>Construction of this advertisement to:</b> The Manager Operations, Allied Testing Services (ATS), 171-G, Street No. 36, Sector F-10/1, Islamabad, forquery on help Daile, 051-2153577-9. <b>TETISIDEZI DIRECTOR GENERAL</b> SOIL AND WATER CONSERVATION, KHYBER PAKHTUNKHWA PESHAWAR <b>Construction of this advertisement to:</b> The Manager Operations, Allied Testing Services (ATS), 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 174-2021, 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The duly filled in<br/>application forms alongwith onlinel deposition is bould reach within 5-days through any counter service/<br/>registered post after publication of this advertisement to: The Manager Operations, Allied Tasting Services.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               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| 119       المركز كان تجديد و تعدق المركز كان تجديد و تعدق المركز كان تعديد و تعديد تعد و تعديد و تعد                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   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| کوی کی کی تحصی التحت ا<br>روز المرکز اور الارز ریکر ایری ای که ا<br>روز المرکز اور الارز ریکر ایری ای که ا<br>الف) اساسی الم این الم این الم این ا<br>الف) اساسی الم اور ایری تجر<br>شرو تروی می مدو ای اور ایری تجر از کری تم<br>شرو تروی می مدو ایری اور ای ایکر ایک<br>سر سیکن اور تروی می حدو ای کی اور کاری تجر<br>سیکن اور تروی می حدو ای کی اور کاری تجر                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        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زیک بر مرجد کو<br>کار زیک بر مرجد<br>تالیع<br>ایک توادر کار<br>ایک توادر کار<br>ایک توادر کار<br>ایر یک توادر کار<br>ایر دیک توادر کار<br>ای داد<br>ای دیک توادر کار<br>ای داد<br>ای دیک توادر کار<br>ای داد<br>ای دیک توادر کار<br>ای دیک تواد کار<br>ای دیک تا دیک تواد کار<br>ای دیک تواد کا                                                                                                                       | کویت کی تحص تحص ا<br>زر ام تر زر ایر از رز را لیزی ای ای ا<br>زمان کی کوتی الی آشن اسیداروں<br>ال ای کی کوتی الی آشن اسیداروں<br>ال ای کی کرد و ای کی از کر ایک م<br>تر ایر تر ری کرد و ای حکوار کی از کر ایک م<br>تر ایر تر ری کرد و ایک از کر ایک م<br>تر ایر تی زن کرد و ای حکوار کی از کر ایک م<br>میس میکن اور تو رک می و ایک او کی ای کار<br>ال می ای اور تو رک می و ایک او کی ای کار<br>ال می ای اور تو رک می و ایک او کی ای کار<br>تر ایر تی وزی کر می و ایک ای کار کی ای کار<br>تر ایر تی وزی کر می و ایک ای کار کار کی م<br>م تر او تی وزی کر می و ایک ای کار کار کار<br>تر ای تو تی و تی تر ای می تو 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| T II BPS 12     DM BPS 15     PET (BPS-15)     CT BPS-15     SST (IT) BPS-16     SST (IT) BPS-16 <td>III BPS 12       DM BPS 15       PET BPS-15       CT BPS-15       SST (IT) BPS-16       SST (IG) BPS-16       ST (IG)</td> <td>۲۱۹ تا تین بلا<br/>۲۱۹ تر بلا<br/>۲۱۹ تر ۲۹۶<br/>۲۱۹ تر ۲۹۶<br/>۲۱۹ تر ۲۹۹<br/>۲۱۹ تر ۲۹۹<br/>۲۱۹ تر ۲۹۹</td> <td>میکی نیر بختر از از با تظام (م<br/>میکی نیر بختر از از با تظام (م<br/>با مرد 2011-2013 میک نیر با تظام (م<br/>با مرد الکردها ماد پر از تک ایا با<br/>المیک نیری بالای (زار) از کر<br/>المیکی میک<br/>المیک نیری بالای (زار) از کر<br/>المیک نیری بالای (زار) از کر<br/>المیک نیری بالای (زار) از کر<br/>المیک میک ایستالا<br/>المیک میک میک کر<br/>المیک المیک المیک کر<br/>المیک میک کر میک کر<br/>المیک میک المیک کر<br/>المیک کر میک کر<br/>المیک میک کر میک کر<br/>المیک کر میک کر<br/>المیک میک کر میک کر<br/>المیک کر میک کر میک کر<br/>المیک کر میک کر<br/>المیک کر میک کر<br/>المیک کر میک کر میک کر<br/>المیک کر میک کر میک کر میک کر میک کر میک کر<br/>المیک کر میک کر 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                                                                                                          | کویته کی تحسیم اندر اید از ریک لیزی ایک ا<br>روز امتر کوز و اور آن رز ریک لیزی ایک ا<br>الا از مال یک سکوتی اسی ایس ایستا و این<br>الا ایس کی سکوتی اسی ایستی اسیدادون<br>السی سکوتی سکوت این ایستی ایک تحکیم این<br>السی سکوتی سکوت او دین می تجار داری جم<br>می این تر دی کر بعد 9 ایک این اور نیک سکتی<br>اسی از من سکوت او تین می تجار داری این<br>اسی از من سکوت او تین می تجار داری این<br>اسی از من سکوت او تین می تجار داری این<br>اسی از من سکوت او تین می تجار داری این<br>اسی از من ایک ایس این<br>ایس از من ایک ایس این<br>ایس از من ایک ایستی این<br>ایس از من ایک ایس این<br>ایس از مان ایک ایس این<br>ایس از مان ایک ایس این<br>ایس از مان ایک ایک ایس<br>ایس از مان ایک ایک ایک ایک ایک<br>ایس از مان ایک ایک ایک ایک ایک ایک<br>ایس از مان ایک ایک ایک ایک ایک ایک ایک<br>ایس ایک                                                                                                                           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In Re:

Service Appeal No.6338/2020

Muhammad Abbas. . . . . . . . . . . . . . . . . . Applicant/Appellant

#### VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **Respondents** 

# APPLICATION FOR EARLY HEARING AND FIXATION OF THE ABOVE TITLED CASE.

**Respectfully Sheweth:** 

- 1. That the above noted appeal alongwith application for interim relief is pending before this Hon'ble Tribunal, which is now fixed for 16.03.2022.
- 2. That the Service Appeal pertains to promotion of the applicant is pending and the case is complete in all respects and is ready for final arguments, but unluckily on previous date, the case was adjourned due to unavailability of D.B.
- 3. That the respondents have advertised the vacant posts of Junior Clerks and since the formation of the Department, no promotion has been carried out, despite the fact that the applicant is serving since 1996 (Copy of Advertisement is ATTACHED).

- 4. That short question of law is involved in the matter and the date fixed i.e. 16.03.2022 is too far, and if the titled appeal is not fixed earlier, the very purpose of the same would become infructuous, hence this application.
- 5. That it is just, fair as well as in larger interest of justice that the titled appeal alongwith application for interim relief be fixed and heard at the earliest.

It is, therefore, prayed that on acceptance of this application, the titled appeal may kindly be fixed and heard at earliest, so as to decide the matter once for all.

Through

Dated: 20.12.2021

Shah Faisal Ilyas Advocate, Supreme Court

Applicant/Appellant

#### AFFIDAVIT

It is stated on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT