

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP COURT DERA ISMAIL KHAN

S.A # 5190/2021

Sana Ullah Sethi(Appellant)

V E R S U S

Govt. of Khyber Pakhtunkhwa through Secretary Excise
& Taxation & Others.(Respondents)

APPLICATION FOR PLACING ON FILE
DOCUMENTS TO BE ANNEXED IN THE
SUBJECT CASE.

Respectfully submitted that;

1. That the above titled civil suit is pending adjudication before this hon'ble Court and now fixed for 17/01/2023
2. That on previous date of hearing on para-wise comments on behalf of petitioners/respondents # 1 to 3 were submitted.
3. That the counsel for petitioners/respondents # 1 to 3 was proceeding from Peshawar to D.I.Khan at early in the morning, due to which some documents which were

necessary to be annexed with the reply/comments were not submitted.

4. That the said documents are pertaining to the instant appeal which are very necessary for just decision of the case/appeal.

Therefore, the petitioners/respondents # 1 to 3 may graciously be allowed to placed on file the documents pertains to instant appeal and issue direction to annexed the documents as part of the written reply/para-wise comments submitted on behalf of petitioners/ respondents # 1 to 3.

Dated 16/01/2023

Petitioners
Through
Aftab Hussain
Advocate High Court
Cell 03339222269

Aftab
16/01/2023

AFFIDAVIT

I, Aftab Hussain, Advocate (counsel for petitioners) do hereby affirm and declare as per information furnished by my client 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 Court.

Deponent

Aftab
Aftab Hussain 21201-9017753-5
Advocate





DIRECTORATE GENERAL, EXCISE AND TAXATION,
KHYBER PAKHTUNKHWA, PESHAWAR

Auqaf Complex, Shami Road, Peshawar.
Phone: 091-9212260

Anx A

ORDER

Dated Peshawar the 11 /05/2012

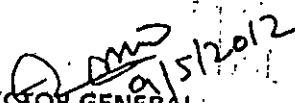
No. 11746 /Estb/XXXV-D-412. In pursuance to the recommendations of the Departmental Promotion Committee in its meeting held on 14-04-2012, the following Excise & Taxation Constables (BPS-05) are hereby appointed as Assistant Sub Inspector (BPS-07) on acting charge basis as admissible under the rules, with immediate effect.

1. Muhammad Iqbal
2. Mr. Amin Khan Durrani
3. Muhammad Shakeel
4. Mr. Lal Gul
5. Mr. Mazhar Ali
6. Mr. Khan Zaib
7. Mr. Zar Shad
8. Mr. Mushtaq Ahmed
9. Mr. Ilyas Khan
10. Muhammad Bilal
11. Mr. Sana Ullah Sethi
12. Muhammad Arshad
13. Muhammad Akram

Consequent upon the above, the following postings / transfers are hereby ordered with immediate effect:

S.#	Name of officials	From	To	Remarks
1.	Muhammad Iqbal	E.T.O, Malakand	E.T.O-I, Peshawar	Against Vacant post
2.	Mr. Amin Khan Durrani	E.T.O-V, Peshawar	Directorate General Excise & Taxation	Against Vacant post
3.	Muhammad Shakeel	E.T.O, Mardan	Directorate General Excise & Taxation	Against Vacant post
4.	Mr. Lal Gul	Directorate General Excise & Taxation	Directorate General Excise & Taxation	Against Vacant post
5.	Mr. Mazhar Ali	E.T.O IV, Peshawar	E.T.O IV, Peshawar	Against Vacant post
6.	Mr. Khan Zaib	E.T.O II, Peshawar	E.T.O II, Peshawar	Against Vacant post
7.	Mr. Zar Shad	E.T.O IV, Peshawar	E.T.O I, Peshawar	Against Vacant post
8.	Muhammad Mushtaq	E.T.O II, Peshawar	E.T.O II, Peshawar	Against Vacant post
9.	Mr. Ilyas Khan	E.T.O III, Peshawar	E.T.O II, Peshawar	Against Vacant post
10.	Muhammad Bilal	E.T.O, D.I.Khan	E.T.O, D.I.Khan	Against Vacant post
11.	Mr. Sana Ullah Sethi	E.T.O, D.I.Khan	E.T.O, Karak	Against Vacant post

	Name of officials	From	To	Remarks
12.	Muhammad Arshad	E.T.O, D.I.Khan	E.T.O, Kohat	Against Vacant post
13.	Muhammad Akram	E.T.O, D.I.Khan	E.T.O, Lakki	Against Vacant post

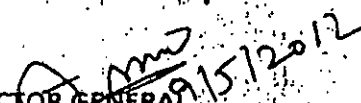

 9/5/2012
 DIRECTOR GENERAL,
 EXCISE & TAXATION,
 KHYBER PAKHTUNKHWA,
 PESHAWAR.

No. 11747-84/Estb/XXXV-D-412

Dated: 11/05/2012

Copy forwarded to:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. PS to Minister for Excise & Taxation Khyber Pakhtunkhwa, Peshawar.
3. PS to Secretary Excise & Taxation Department Khyber Pakhtunkhwa, Peshawar.
4. Excise & Taxation Officer-I, Peshawar.
5. Excise & Taxation Officer-II, Peshawar.
6. Excise & Taxation Officer-III, Peshawar.
7. Excise & Taxation Officer-IV, Peshawar.
8. Excise & Taxation Officer-V, Peshawar.
9. Excise & Taxation Officer, Mardan.
10. Excise & Taxation Officer, Malakand.
11. Excise & Taxation Officer, Swat.
12. Excise & Taxation Officer, Kohat.
13. Excise & Taxation Officer, Karak.
14. Excise & Taxation Officer, Lakki Marwat.
15. Excise & Taxation Officer, D.I.Khan.
16. District Accounts Officers, Peshawar, Mardan, Swat, Malakand, Kohat, Karak, Lakki Marwat, and D.I.Khan.
17. Assistant Director Accounts, Directorate General, Excise & Taxation Khyber Pakhtunkhwa, Peshawar.
18. Officials concerned.


 9/5/2012
 DIRECTOR GENERAL,
 EXCISE & TAXATION,
 KHYBER PAKHTUNKHWA,
 PESHAWAR.

Peshawar dated the 23/01/2017

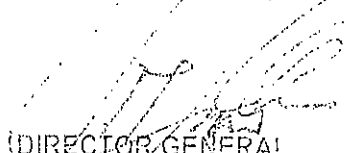
ORDER.

No. 9/2017 /Estb/XXXVD-412. In pursuance of the recommendations of the Departmental Promotion Committee of Excise, Taxation & Narcotics Control Department, Khyber Pakhtunkhwa in its meeting held on 04.01.2017 and in continuation of this Office Order No. 1452/Estb/XXXV-D-412, dated. 09.02.2017, the following Assistant Sub-Inspectors(BPS-08) appointed on acting charge basis are hereby promoted on regular basis with effect from 09.02.2017.

S.#	Name of official	Condition/remarks
01	Muhammad Shakeel	PERs completed. Promoted as ASI on regular basis
02	Mr. Ilyas Khan	PERs completed. Promoted as ASI on regular basis
03	Muhammad Bilal	PERs completed. Promoted as ASI on regular basis.
04	Sana Ullah Sethi	PERs completed. Promoted as ASI on regular basis.
05	Muhammad Arshad	PERs completed. Promoted as ASI on regular basis.
06	Mr. Saifdar Hussain	PERs completed. Promoted as ASI on regular basis.

Annex B

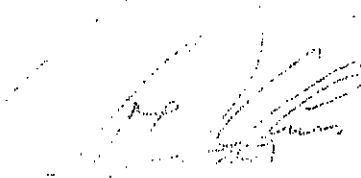
02. The Officials will remain on probation for a period of one year under Rule-15(1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 dated upto 31st January, 2009.


(DIRECTOR GENERAL,
EXCISE, TAXATION & NARCOTICS CONTROL
DEPARTMENT, PAKHTUNKHWA, PESHAWAR)

17609-21671
/Estb/XXXV D-412.

Copy forwarded for information to:-

1. Accountant General, Fort Road, Khyber Pakhtunkhwa.
2. All Regional Deputy Directors, Excise & Taxation, Khyber Pakhtunkhwa.
3. All Excise and Taxation Officer in Khyber Pakhtunkhwa.
4. All District Accounts Officers in Khyber Pakhtunkhwa
5. PS to Minister Excise & Taxation, Khyber Pakhtunkhwa.
6. PS to Secretary Excise, Taxation & Narcotics Control, Khyber Pakhtunkhwa, Peshawar
7. Officials concerned.
8. Personal files.


DIRECTOR GENERAL,
EXCISE, TAXATION & NARCOTICS CONTROL
DEPARTMENT, PAKHTUNKHWA, PESHAWAR



DIKHAN REGION DIKHAN.

No. 368-72 /Dir.ET&NC/ DIKHAN REGION Dated 10/04 /2018.

To

All Excise, Taxation & Narcotics Control Officers,
DIKhan Region.

Subject:- NOTIFICATION/SENIORITY LIST OF ASI (BPS-11)

Memo:-

Enclosed please find herewith Notification No. 3670/Estb/XXXV-A-227 (Seniority) dated 04/04/2018 alongwith seniority list received from Director General, Excise, Taxation & Narcotics Control, Khyber Pakhtunkhwa, Peshawar for information *and circulate amongst all concerned*.


Director

Endst. No. 373 /Dir.ET&NC/DIKHAN REGION

Copy to :-


The Director General, Excise, Taxation & Narcotics Control, Khyber Pakhtunkhwa, Peshawar for information with ref. to his No. & dated cited above.


Director

NOTIFICATION.

Annex - C

No. 3670- /Estb/XXXV-A-227(Seniority). In exercise of powers conferred under Section 8 of Khyber Pakhtunkhwa, Civil Servants Act, 1973, final seniority list of Assistant Sub-Inspectors (BPS-11) of the Excise, Taxation and Narcotics Control, Khyber Pakhtunkhwa as stood on 28.02.2018 is circulated for information of all concerned.



DIRECTOR GENERAL,
EXCISE, TAXATION & NARCOTICS CONTROL,
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 3671-73 /Estb/XXXV-A-227(Seniority),

Copy forwarded for information to:-

- 1- PS to Secretary to Government of Khyber Pakhtunkhwa, Excise, Taxation and Narcotics Control Department, Peshawar.
- 2- All the Regional Deputy Directors, Excise and Taxation, in Khyber Pakhtunkhwa with the direction to circulate the same within their respective regions.

*AS per
AS circulate
for information to
all concerned.
10/4/18.*


DIRECTOR GENERAL
EXCISE, TAXATION & NARCOTICS CONTROL,
KHYBER PAKHTUNKHWA, PESHAWAR.

*Director
South Region
D. 1. 12/18.*

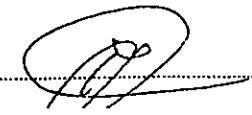
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7/18

AL SENIORITY LIST OF ASSISTANT SUB INSPECTOR (BPS-11) OF EXCISE, TAXATION AND NARCOTICS CONTROL, KHYBER PAKHTUNKHWA AS IT STOOD ON 28-02-2018.

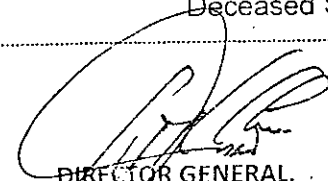
S #	NAME OF OFFICIAL	HOME DISTRICT	DATE OF BIRTH	DATE OF JOINING GOVT: SERVICE.	DATE OF APPOINTMENT/ PROMOTION AS ASI IN E&T DEPTT:	REMARKS
1-	2-	3-	4-	5-	6-	7-
1	Mr. Hidayatullah Khan	Lakki Marwat	01.03.1972	10.09.1995	10.09.1995	On Ex-Pakistan leave
2	Mr. Aminullah	Peshawar	01.06.1960	01.01.1981	22.10.2001	Surplus Pool Employees. Seniority fixed on the basis of Date of Joining Government Service.
3	Raja Ghazanfar	Peshawar	20.08.1965	14.01.1985	22.10.2001	
4	Mohammad Jamil	Peshawar	02.04.1968	01.04.1987	22.10.2001	
5	Mr. Shah Jehan	Peshawar	12.01.1969	19.08.1990	22.10.2001	
6	Mr. Aaqil Shah	Peshawar	13.05.1969	19.10.1991	22.10.2001	
7	Mr. Fayyaz Ali	Peshawar	01.01.1969	04.12.1991	22.10.2001	
8	Mr. Shaukat Ali	Peshawar	15.08.1966	20.04.1992	22.10.2001	
9	Mohammad Tariq Jan	Peshawar	05.04.1966	02.12.1992	22.10.2001	
10	Mr. Gohar Ali	Charsadda	04.02.1974	07.09.1994	22.10.2001	
11	Mr. Israr Hussain	Peshawar	01.01.1969	13.08.1991	23.10.2001	
12	Mr. Asadullah	Peshawar	04.04.1966	24.09.1993	23.10.2001	
13	Mr. Shah Nawaz	Peshawar	27.02.1971	14.04.1994	23.10.2001	



Abzada Saadullah	Charsadda	20.06.1990	27.08.2012	27.08.2012	Direct Appointee
Sajjad Ahmad	Peshawar	07.10.1990	27.08.2012	27.08.2012	Direct Appointee
Ismammad Ali	Buner	01.02.1983	30.08.2012	30.08.2012	Direct Appointee
Ismammad Daud	Peshawar	15.05.1970	24.09.2013	24.09.2013	Direct Appointee
Arza Sultan	Bannu	01.03.1997	10.06.2016	10.06.2016	Deceased Son Quota
Munusaqib	Malakand Agency	05.08.1994	11.08.2016	11.08.2016	Deceased Son Quota
Amin Khan Durrani	Peshawar	19.10.1971	17.07.1991	09.02.2017	Promotee
Ismammad Shakeel	Mardan	05.05.1973	31.08.1991	09.02.2017	Promotee
Muhammad Gul	Nowshera	10.08.1971	23.10.1996	09.02.2017	Promotee
Mazhar Ali	Peshawar	01.01.1970	22.10.2001	09.02.2017	Promotee
Khan Zeb	Peshawar	02.10.1972	22.10.2001	09.02.2017	Promotee
Arshad	Peshawar	01.01.1973	22.10.2001	09.02.2017	Promotee
Mushtaq Ahmad	Charsadda	08.09.1975	22.10.2001	09.02.2017	Promotee
Khan	Peshawar	10.10.1971	24.10.2001	09.02.2017	Promotee
Ismammad Bilal	D.I.Khan	07.08.1974	27.10.2001	09.02.2017	Promotee
Muhammad Ullah Sethi	D.I.Khan	20.04.1967	29.10.2001	09.02.2017	Promotee
Ismammad Arshad	D.I.Khan	10.01.1976	29.10.2001	09.02.2017	Promotee
Muhammad Akram	D.I.Khan	01.07.1970	01.11.2001	09.02.2017	Promotee

	Saida Gul	Swat	01.05.1968	01.12.2001	09.02.2017	Promotee
	Mr. Yousaf Khan	Swat	15.06.1972	01.12.2001	09.02.2017	Promotee
160	Mr. Barkatullah	Swat	01.01.1973	01.12.2001	09.02.2017	Promotee
161	Mr. Abdul Hassan	Buner	17.04.1976	11.12.2001	09.02.2017	Promotee
162	Mr. Sohna Khan	D.I.Khan	20.03.1965	13.12.2001	09.02.2017	Promotee
163	Mr. Hazrat Ali	Charsadda	01.12.1972	01.01.2002	09.02.2017	Promotee
164	Mr. Muhammad Javed	Kohat	21.04.1970	04.01.2002	09.02.2017	Promotee
165	Sardar Hussain	Hangu	12.12.1966	18.01.2002	09.02.2017	Promotee
166	Muhammad Taj ud Din	Chitral	18.04.1971	04.02.2002	09.02.2017	Promotee
167	Mr. Waris Khan	Mardan	14.02.1972	01.11.1990	01.11.2017	Promotee
168	Mr. Abdur Rashid	Swabi	17.04.1959	07.08.1994	01.11.2017	Promotee
169	Mr. Tariq Aziz	D.I.Khan	06.04.1967	28.10.2001	01.11.2017	Promotee
170	Mr. Muhammad Tahir	D.I.Khan	18.05.1968	29.10.2001	01.11.2017	Promotee
171	Mr. Agha Maqbool Hussain	D.I.Khan	04.07.1973	31.10.2001	01.11.2017	Promotee
172	Mr. Muhammad Azmat	Kohat	15.03.1961	16.05.2002	01.11.2017	Promotee
173	Mr. Muhammad Younas	Lakki Marwat	31.12.1966	27.06.2002	01.11.2017	Promotee
174	Mr. Muhammad Ishaq	Mardan	12.05.1968	16.07.2002	01.11.2017	Promotee
175	Mr. Nisar	Buner	11.10.1974	18.10.2002	01.11.2017	Promotee

	kram	Swabi	08.01.1968	01.02.2003	01.11.2017	Promotee
	Mr. Anwar Said	Dir	10.04.1977	21.03.2003	01.11.2017	Promotee
178	Mr. Shafi Ullah	Mardan	12.06.1965	01.04.2003	01.11.2017	Promotee
179	Mr. Naeem Khan	Peshawar	16.12.1971	01.04.2003	01.11.2017	Promotee
180	Mr. Muhammad Sareer	Mardan	01.04.1976	01.07.2003	01.11.2017	Promotee
181	Mr. Shamshad Khan	Charsadda	01.01.1963	18.07.2003	01.11.2017	Promotee
182	Mr. Abdur Rahid	Karak	01.01.1977	28.07.2003	01.11.2017	Promotee
183	Mr. Zulfiqar Ali	Mardan	02.05.1971	26.01.2004	01.11.2017	Promotee
184	Mr. Abdul Majeed	Abbottabad	13.05.1978	27.01.2004	01.11.2017	Promotee
185	Mr. Zahid Anwar	Peshawar	13.01.1984	15.03.2007	01.11.2017	Promotee
186	Mr. Ibrahim	Swat	01.04.1983	01.06.2007	01.11.2017	Promotee
187	Mr. Sher Shah	Mardan	16.03.1984	01.06.2007	01.11.2017	Promotee
188	Mr. Abdur Razaq	Mardan	11.04.1962	26.11.2007	01.11.2017	Promotee
189	Mr. Shakeel Munir	Charsadda	10.03.1988	30.11.2017	30.11.2017	Deceased Son Quota
190	Mr. Sajid Khan	Peshawar	06.06.1991	30.11.2017	30.11.2017	Deceased Son Quota


 DIRECTOR GENERAL,
 EXCISE, TAXATION & NARCOTICS CONTROL,
 KHYBER PAKHTUNKHWA PESHAWAR.