30.03.2018

None for the appellant present. Notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing on 20.04.2018 before S.B.

(Ahmad Hassan) Member

20.04.2018

None for the appellant present. Notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing on 08.05.2018 before S.B.

(Ahntad Hassan) Member

08.05.2018

The Tribunal is non-functional due to retirement of our Hon'ble Chairman. Therefore, the case is adjourned. To come up for same on 05.07.2018.

Reader

Ahmad Hassan) Member

05.07.2018

Counsel for the appellant present Counsel for the appellant requested for withdrawal of the instant appeal. In this respect his signature also obtained in the margin of the order sheet. Request accepted and the appeal in hand is therefore, dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED: 05.07.2018

Six, gursh to withdown the instant appeal

# Form-A FORMOF ORDERSHEET

Court of		
Case No.	276/2018	

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S:No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	28/02/2018	The appeal of Dr. Muhammad Javed Khan presented
	,	today by Mr. Tariq Kamal Advocate may be entered in the
		Institution Register and put up to Worthy Chairman for proper
ı.		order please.  REGISTRAR 28/2/18
2-	01/03/18.	This case is entrusted to S. Bench for preliminary hearing
	01/03/18.	to be put up there on $12/03/10$ .
		CHAIRMAN
12.03		None present on behalf of the appellant. Adjourned. To be up for preliminry hearing on 30.03.2018 before S.B
		(Muhammad Hamid Mughal) Member
	· }	Wiember
v		
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## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. <u>**276**</u>/2018

Dr. Muhammad Javed Khan SRO (Soil Chemistry) ARS Ahmad Wala Karak

.....Appellant

#### **VERSUS**

Secretary Agriculture Government of Khyber Pakhtunkwa, and others

.....Respondents

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Appellant

Through

Tariq Kamal 27/2/018

Advocate, High Court

Peshawar

Cell#0301-5932818

Dated: - 26.02.2018

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtukhwa Service Tribunal

Diary No. 28/

Service Appeal No. 276 /2018

Durco 28-2-20/8

Dr. Muhammad Javed Khan SRO (Soil Chemistry) ARS Ahmad Wala Karak

.....Appellant

### **VERSUS**

- 1. Secretary Agriculture Government of Khyber Pakhtunkhwa.
- 2. Chief Secretary Govt of Khyber Pakhtunkhwa.
- 3. Director General Agriculture Research IDS Building Agriculture University Peshawar.

.....Respondents

Fledto-day
Registrar

APPEAL U/S 4 OF KP SERVICES
TRIBUNAL ACT, 1974 TO THE
EFFECT THAT PROMOTION OF THE
APPELLANT BE CONSIDERED FROM
DATED 06.02.2006 WHEN THE
OFFICER JUNIOR TO THE
APPELLANT WAS PROMOTED.

#### PRAYER IN APPEAL:-

ON ACCEPTANCE OF THE INSTANT

APPEAL THE PROMOTION OF

APPELLANT MAY PLEASE BE

# CONSIDERED FROM DATED 06.02.2006 WITH ALL ITS BENEFITS ACCORDING TO RULES.

#### Respectfully Sheweth:-

#### **Brief Facts:-**

- 1. That an anomalous and defective procedure for determination of seniority and promotion was in practice in Agriculture Research System due to which the officer Junior to the appellant namely Dr. Zaheer Ullah was promoted on dated 06.02.2006.
- 2. That this issue of defective determination of seniority and promotion has been decided by the Hon'ble Services Tribunal vide its judgment dated 17.07.2012. (Copy of the Judgment is attached as Annexure "A").
- 3. That the appellant has been promoted to BS-18 vide notification dated 16.08.2016. (Copy of the Notification is attached as Annexure "B").
- 4. That the appellant submitted an appeal before the competent authority for considering the promotion of the appellant since 06.02.2006 according to rules as a junior officer to the appellant was promoted on the questioned date but to no avail, hence the instant appeal. (Copy of appeal dated 03.11.2017 is attached as Annexure "C").

#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.\_\_\_\_/2018

Dr. Muhammad Javed Khan SRO (Soil Chemistry) ARS Ahmad Wala Karak

.....Appellant

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

Secretary Agriculture Government of Khyber Pakhtunkwa, and others

.....Respondents

#### AFFIDAVIT

I, Dr. Muhammad Javed Khan SRO (Soil Chemistry) ARS Ahmad Wala Karak, do hereby solemnly affirm and declare on Oath that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by;-

DEPONENT

CNIC#/4203-2041419-7

of Law

Tariq Kamal 27/2/0/8
Advocate, High Court

**Peshawar** 



## BEFORE THE PAKHTUK LAWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1146/2011

Date of Institution

10.6,2011

Date of Decision

17.7.2012

Imrun Ali Research Officer, ARI, Tarnab.

(Appellant)

#### VERSUS

1. Director General, Agriculture Research, IDS Building, Agricultural University Khyber Pakhtunkhwa, Peshawar

2. Government of Khyber Pakhtunkhwa through Secretary, Food, Agriculture, Livestock and Cooperation Department, Peshawar.

3. Vice Chancellor, Khyber Pakhtunkhwa Agriculture University Peshawar.

(Respondent)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 19/4, AGAINST THE ORDER/LETTER DATED 13.5.2011 OF RESPONDENT NO. 1 WHEREBY RESPRESENTATION OF THE APPEAL HAS BEEN REJECTED.

MR. AKHTAR ILYAS, Advocate

For Appellant

MR. ARSHAD ALAM, Addl. Government Please

For respondents

SYED MANZOOR ALI SHAH, MR. FAREEDULAH KHAN,

MEMBER MEMBER

#### JUDGEMENT

SYED MANZOOR ALI SHAH, MEMBER:- This appeal has been filed by Mr. Imran Ali, Research Officer, Agriculture Research Institute, Tarnab Peshawar, under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 19/4, against the order dated 13.5.2011, whereby his representation has been rejected.

2. Brief facts of the case are that initially services of the employees of the Agriculture Research were governed by the general rules applicable to the civil servants in the Khyber Pakhtunkhwa. These rules were replaced by the Khyber Pakhtunkhwa Agriculture Department (Recruitment and Appointment) Rules, 1981. Vide notification dated 2.2.2008, some amendments were made in 1981 rules, introducing certain changes in the method of recruitment for various post.

ATTESTED

Yarid Advocate 37/2/018

in the Agriculture Research Wing. These rules do carry Schedule-II wherein subject groups are provided. These subject groups are practically followed by recruiting the officials having qualification of the same subject nor they provide for a separate cadre but separate seniority is awarded to the officers of each separate subject groups. These groups are optional and any officer having Bachelors Degree or above in any Agricultural related subjects can enter into any group. The officers in functional groups consisting of smaller number of officers/officials are getting rapid promotion than the officers/officers who happened to fall in larger functional groups. To remove the anomaly the Director General Agriculture Research office (respondent No. 1) addressed a letter dated 27.11.2010 to respondent No. 2 wherein he requested for abolition of Schedule II from the rules of 1981. Feeing aggrieved, the appellant filed Writ Petition No. 42/2011, vide order dated 15.2.2011, the writ was disposed of and it was treated as a representation before the departmental authority, and sent to Secretary, Food, Agriculture, Livestock and Cooperation Department, Peshawar for decision strictly in accordance with law within a month's time. The representation was rejected vide order dated 13.5.2011, hence the present appeal.

3. The appeal was admitted to regular hearing on 6.7.2011 and notices were issued to the respondents. Respondents No. 1 and 2 have filed their joint written reply and contested the appeal.

Arguments heard and record perused.

The learned counsel for the appellant argued that the functional groups (subject groups) formed vide schedule-II of the 1981 Rules are meant only for efficient working of specialized and well-trained scientists in their respective subjects and they do not constitute separate cadres that may justify seniority and promotion in each functional group. Such a practice adopted by the respondent department due to misinterpretation and misuse of rules. The functional groups are optional and are not subject related. He further argued that these functional groups and the separate promotion within the groups have given irrational results. The officers in smaller functional groups get rapid promotion while in the larger groups the process of promotion is very slow. He stated that functional groups do not constitute separate cadres notwithstanding, the matter of seniority in the respondent department is regulated by Section 8 of the Knyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, which provide that the interse seniority of the officers shall be maintained at a

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position of lower grade seniority based on their first entry into the service. This controversy has already been set at rest not only by the Establishment & Administration Department in the case of M/S Dilrosh and भर्मीडोडकम Jan but also by the Hon'ble High Court vide judgment dated 26.5.2004. Subsequent amendments in Rule 17 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989 also support the appellant's plea. The learned counsel for the appellant contended that Rules of 1981 are also discriminative in nature and are required to be brought at par with those of other Wings of the respondent department by abolishing/deleting the clauses of initial. recruitment, as envisaged by para (b) in column 6 against the post of Senior Research Officer (BFS-18). He further contended that the incumbent posts are mostly administrative and the higher qualification of Ph.D is seldom a need for running the affairs connected with these offices, rather it is the experience which should be more relevant for the efficient working against these posts, hence the initial recruitment on the basis of Ph.D degree against the administrative posts would serve no useful purpose. He requested that the appeal may be accepted and the respondents may be directed to treat the subject groups as envisaged by schedule-II to the 1981 rules as a single cadre and they be restrained from issuance of separate seniority lists for each functional group and abolish the subject/functional groups, If the functional groups remained intact, then the respondents be directed to award seniority to the officers on the basis of their initial induction in service:in accordance with notification of provincial government dated 19.11.2009 and judgment in Writ Petition No. 81/2002.

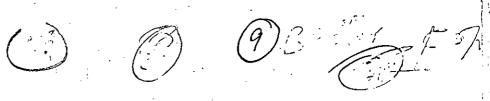
The learned AGP on the other hand argued that Rules of 1981 were framed by the provincial government to improve research system in the agriculture sector. Schedule II is meant for the purpose to accommodate the suitable candidates having specialized degrees in their relevant subject groups. The candidates having irrelevant degree cannot be appointed against the post of non-specialized vacancies. He further argued that no anomalies/irregularities have been done in the department. Every officer can easily work on their subject functional group after recruitment/appointment according to his subject functional group in the relevant group having the knowledge of all the instruments in their laboratory. He stated that the seniority of the officers is maintained in the department from the date of induction into service according to 1981 Rules (Schedule-II) which clearly mentioned that the interse seniority of civil servants in a certain cadre in which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of require

Yand Advocate 37/2/018 appointment/promotion of the civil servants in the lower posts. Certain cadre means functional group; every functional group maintained seniority of the Research Officer from their date of appointment under the rules. The question of pick & choose is not arise because highly qualified and Ph.D candidates are appointed after competitive examinations through Public Service Commission after advertisement of the posts in newspapers. He requested that the appeal may be dismissed.

The Tribunal observes that groups constituted are meant for efficient working and are not separate cadres, the groups are not subject related and does; not have specific criteria/requirements and optional. The matter of seniority, of civil servants is regulated under Section 8 of Khyber Pakhtunkhwa Civil Servants Act 1973, and Section 17 (amended) of the Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules 1989, according to which the inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post. Vide judgment dated 20.5.2004, the Hon'ble Peshawar High Court accepted Writ Petition No. 81/2002, No.: 437/2002 and 279/2007 set aside the impugned orders with direction to respondent department to prepare a fresh joint list of Senior Research Officers irrespective of their functional group and seniority within the group and to undertake fresh process for filling of posts in question strictly in accordance with the Khybert Pakhtunkhwa Agriculture Department (Recruitment and Appointment) Rules, 1981 with reference to Schedule-1 for the appointment of Director/Coordinator Agriculture Research. The decision of S&GAD in the case of M/S Dilrosh and Tasleem Jan also supports appellant's case. The Tribunal into view of the above accepts the appealato this extent whereas in case of Pprescribing specific qualifications for BPS-18 (Rh.D in this case) is the prerogative in the prerogative of the government as it deems fit for initial recruitment. Parties are left to bear their own costs. File be consigned to the record.

This judgment will also dispose of other connected appeals ino. 974/2011 Muhammad Hussain, No. 1147/2011 Manzoor Akbar, No. 1148/2011 Noora Jan, No. 1149/2011 Muhammad Iqbal, No. 1150/2011 Jan Muhammad, No. 1151/2011, Muhammad Rafiq, No. 1152/2011 Abdul Majeed, No. 1153/2011 Zubir, Shah, No. 1154/2011 Abdur Rauf, No. 1155/2011 Suleman Ali, No. 1156/2011 Imtiaz Ahmad, No. 1157/2011 Abdul Qayum, No. 1158/2011 Tehseenullah Khan, No. 1159/2011 Sahib Zada Rashid Ahmad, No. 1160/2011

Tand Advocate 37/2/018



Muhammad Ibrar, No. 1161/2011 Dr. Bashir Ahmad, No. 1162/2011 Akram Khan, No. 1163/2011 Zahoor-ul-Had, No. 1164/2011 Mir Abbas Khattak, No. 1165/2011 Mahabat Khan, No. 1166/2011 Muhammad Javed, No. 1167/2011 Sadur Rehman, No. 1168/2011 Tariq Jan, No. 1169/2011 Muhammad Aqeel, No. 1170/2011 Ayub Jan, No. 1171/2011 Zameer Hussain, No. 1172/2011 Shah Sawar, No. 1173/2011 Azim Khan, No. 1174/2011 Inayat Hussain, No. 1175/2011 Nazir Ahmad, No. 1176/2011 Humayun Khan, No. 1177/2011 Sharafat Gul, No. 1178/2011 Muhammad Anwar, No. 1179/2011 Habibullah, No. 1180/2011 Tahir Sajjad; No. 1181/2011 Ghulam Rasool in the same manner.

ANNOUNCED 17.7.2012

(FAREEDU (AH) HHAD)

(SYED MANZOOR ALI SHAH)

Certification to be the copy

EMANATURE

Khyber Patricking

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Date of President of Apriliantion 27-7-2012

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Taril Advocate 27/2/018





#### GOVERNMENT OF KLIYBER PAKHTUNKHWA AGRICULTURE LIVESTOCK & COOPERATIVE -DEPARTMENT

Dated Penhawar, the August 16, 2016.

NOTIFICATION.

NO. SOE (AD) V-7/2015/RW.-

On recommendations of the Provincial Selection

Board (PSB), the competent authority is pleased to promote the following BS-17 Officer of Agriculture Research to BS-18 on regular basis with immediate effect:-

Sr.No.	Name of Officer	Sr.No.	Name of officer
1	Mr. Abdur Rauf	2.	
3.11.	Dr. Imtiaz Ahmad	4	Dr. Manzoor Akbar Dr. Sadur Rehman
5.	Mr. Abdul Majeed	6	Mr. Muhamnad Subhan
7	Mr. Muhammad Suleman		Dr. Amjad Khan.
9.	Mr. Imran Ali	10.	Dr. Azim Khan
11.	Dr. Eariq Jan	12.	Dr. Bashir Ahmad
13.	Mr. Ahmad Said	14.	Mr. Hamayun Khan
15	Mr. Nazir Alimad	A 6,	Dr. Muhammad Javed Khan
17:	Mr. Innyat Hussain Shah	18.	Mr.Muhammad Shah Sawar
21.9	Dr. Ehsan Ullah	20:	Mr. Muhammad Anwar
21.	Mr. Nayyar Iqbal	22.	Syed Mehmood Shah Madni
23.	Dr. Barkat All Khan	24.	Mr. Noora Jan
25.	Mr. Abdur Ragib	26.	Mr. Muhabat Khan
27.	Mr. Shirin Khan	28	Mr. Muhammad Hyas
29.	Mr. Muhammad Aqcel	30.	Mr. Muhammad Akram
	Mr. Zubair Shah	32.	Mr. Muhammad Rafig
33.	Mr. Muhammad Sajjad	34	Dr. Muhammad Iqbal
	Dr. Khalifür Rehman	36.	Mr. Niaz Muhammad
	Mr.:Javed:Iqbal	38	Mr. Muhammad Ayaz
	Mr. Zafar Ali Khan	40.	Mr. Ziaullah
	Mr. Fazli Wahab	42.	Mr. Ahmad Zada
43	Mr. Abdul Qayyum	44.	Mr. Mirza Hassan
	Mr. Ayub Jan	46.	Mr. Tariq Ahmad Jan
	Mr. Muliammad Khan	48.	Dr. Shahzada Arshad Salim
	Ar Flafizur Rehman	50.	Mr. Falak Naz
	Ar Mahmoodur Rehman	52.	Mr. Tajir Hussain
	Ar: Muhammad Hyas	-54	Mr. Nisar Nacom
55: N	ItaRoslian Ali	56	Mr. Muhampad Tallir
	Ir Dazal Maula	58.	WAY A STEEL OF THE STEEL
596 - D	r. Kalimani Qul	60.	Mr. Amioulich
	ir Sartai Ali	62:	Mr. Pahir Sajiad
	m:Millabuddin		Dr. Ahmad Abbas.
	n-Wood Elabib		Mr. Ijaz Akhtar
	in the latest the same of the	66.	Mr. Irfan Ullah Khan
A CANCELLER		68	Mr. Muhammad Younus
Professional Commencer Contract Contrac		and realized by the source	As the process of the control of the second section of the control

ATTECTED

Taril Advocate

37/2/018





## GOVERNMENT OF KHYBER PAKHTUNKHWA AGRICULTURE LIVESTOCK & COOPERATIVE DEPARTMENT

Dated Peshawar, the August 16, 2016

	Name of Officer	Sr.No.	Name of officer
	Name of Officer	"Sr. No.	Name of officer
69:	Mrs. Rozina Naz	70.	Mr. Biland Iqbal
71.	Mr. Sajjad Anwar	72.	Mr. Nasiruddin
73.	Mr. Akhtar Ali	74	Mr. Amiad Ali
75.	Mr. Mushtaq Ahmad	76.	Miss Amna Sadozai
77.	Miss Isma Khurshid	78.	Miss Zishan Gul
79.	Mr. Muhammad Arif	80	Mr. Zahid Igbal
81.	Mr. Igrar Hussain	.82.	Mrs. Tavyeba Samreen
83	Mr. Abdul Qadoos	-84	Mr. Zahid Salim
85	Mr. Islam Zada	86	Mrs. Bibi Haleema
<b>*87</b> .:	Mr. Javed Rehman	-88	Dr. Ghazal Miraj
89.	Mr. Muhammad Khalid	90	Dr. Muhammad Asim
91.	Mr. Shahid Ali	92.	Mr. Mchboob Ahmad

2. They will be on probation for a period of one year extendable for another one year in terms of Rule-15 of APT Rule, 1989. Their posting order will follow subsequently.

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
AURICULTURE, LISTOCK AND COOP: DEPTT

#### Endst. of even No. & Date.

Copy forwarded for information and necessary action to the:-

- 1. Director General, Agriculture Research, Khyber Pakhtunkhwa, Peshawar.
- 2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 3. Officers concerned.
- 4. PS to Minister for Agriculture, Khyber Pakhtunkhwa.
- 5. PS to Chief Scotetary, Khyber Pakhtunkhwa.
- 60 PS to Secretary Agriculture, Khyber Pakhtunkhwa.
- L. Personal file of the officer's concerned.
- 8. Master file.

(Dr.Mir Ahmad Khan) SECTION OFFICER ESTI

グナナトラナート

Taril Advocate 37/2/01 To

The Honorable Chief Minister

Khyber Pakhtunkhwa

Subject:

REPRESENTION/ APPEAL FOR CONSIDERATION OF

PROMOTION OF APPELLANT FROM THE DATE 06/02/2006,

WITH ALL THE BENEFITS.

#### Respected Sir,

The appellant submits as under.

- 1. That in Agricultural Research System seniority and promotion of the officers were used to be determined and made in functional groups, without adhering to the service rules.
- 2. That due to the anomalous and defective procedure for the determination of seniority and promotions of the officers Junior to the appellant in initial appointment order namely Dr Zaheer Ullah Khan has been promoted to BS-18 on 06/02/2006 Copy of initial appointment order annexed.
- 3. That this procedure has been nullified by the Honorable Services Tribunal, vide its Judgment dated 17/07/2012 copy annexed.
- 4. That now the appellant has also been promoted to BS-18 vides notification dated 16/08/2016 with immediate effect copy annexed.
- 5. That according to civil servant Act 1973 and KP appointment Promotion and transfer rules 1989 the appellant's promotion with all benefits is to be considered from the date which is 06/02/2006, when his immediate junior (Dr Zaheer Ullah) was promoted.

Therefore it is humbly requested that promotion of the appellant with all its benefits may please be considered from dated 06/02/2006 according to rules.

**APPELLANT** 

Dr Muhammad Javed Khan

Senior Research Officer (soil Chem.)

Ahmadwala Research Station, Karak.

Tand Advocate 3-7/2/019

(14)

مورد (3 فروری مام میرفان بنام مقدم طارید فان بنام میرفان بنام فرد ما در فران فرد ما ورد فان میرفان فرد ما میرفان فرد می مام میرون می مودن میرون میرون

باعث تحريرآ نكه

مقدمه مندرجه عنوان بالا میں اپی طرف ہے واسطے پیروی وجواب دہی وکل کاروائی متعلقہ
آن مقام مشرکر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
و کیل صاحب کوراضی نامہ کرنے وتقرر ثالث وفیصلہ پر حلف دیے جواب دہی اورا قبال دعویٰ اور بین ساحب کوراضی نامہ کرنے وتقرر ثالث وفیصلہ پر حلف دیے جواب دہی اورا قبال دعویٰ اور درخواست ہرضم کی تصدین بصورت وگری کرنے اجراء اور وصولی چیک وروپیدار عرضی دعویٰ اور درخواست ہرضم کی تصدین زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یاڈگری کی طرفہ یا پیل کی برامدگ اور منسوخی نیز دائر کرنے اپیل گرانی ونظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ ندکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے مقدمہ ندکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ ندکورہ با اختیارات حاصل ہوں گے

اوراس کاساختہ پرداختہ منظور و قبول ہوگادوران مقدمہ میں جوخر چہ ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔کوئی تاریخ بیش مقام دورہ پر ہو یا صدہ باہر ہوتو وکیل صاحب پابند ہوں گے۔کہ پیروی مذکورکریں ۔لہذاو کالت نامہ کھدیا کہ سندر ہے۔

الرق ع الله فروزي (2018ء

Tand ravocate 3712/013

عدنان سنيشنري مارب چکشتگري پڻاورځي نون 2220193 م Mob: 0345-9223239 Jan X