

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Appeal No. 03/2022

Case No. 3990

Kifayat Ullah

Dated 2/3/2023
Appellant


VERSES

Govt; of Khyber Pakhtunkhwa & others.....

Respondents

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DEPONENT NO.3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**Appeal No.03/2022**

Kifayat Ullah, Junior Village Secretary (BPS-09),
Local Government & Rural Development Department, Peshawar.

.....**Appellant**

VERSUS

1. The Secretary Local Government, Elections & RDD, Khyber Pakhtunkhwa Civil Secretariat, Peshawar.
2. The Director General, Local Government & Rural Development
3. The Assistant Director, Local Government & RDD, Peshawar.
4. Kamran Ullah Khan S/o Ihsan Ullah, Junior Village Secretary (BPS-09) LG & RDD, Peshawar.
5. Noor Saleem S/o Shahi Akbar, Junior Village Secretary (BPS-09) LG & RDD, Peshawar.
6. Abdullah Bashir S/o Bashir Ahmad, Junior Village Secretary (BPS-09) LG & RDD, Peshawar.
7. Fawad Shah S/o Masal Khan, Junior Village Secretary (BPS-09) LG & RDD, Peshawar.
8. Zeeshan Pervez S/o Alhaj Parvez Akhtar, Junior Village Secretary (BPS-09) LG & RDD, Peshawar.
9. Israr Afzal S/o Fazal Dayan, Junior Village Secretary (BPS-09) LG & RDD, Peshawar.
10. Atta Ullah S/o Muhammad Alam Khan, Junior Village Secretary (BPS 09) LG & RDD, Peshawar.
11. Wakeel Ahmad S/O Shakeel Ahmad, Junior Village Secretary (BPS-09) LG&RDD,Peshawar.
12. Muhammad ali S/O Mukhtiyar Ahmad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
13. Faheem Ullah S/O Kifayat Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

14. Saira D/O Akhtar Munair, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
15. Muhammad Adnan S/O Lal Sher, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
16. Amjad Islam S/O Peer Islam, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
17. Muhammad Tariq Ajmal S/O Ajmal Ali, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
18. Habib Gul S/O Taj Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
19. Farid Ullah S/O Badshah Jee, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
20. Adnan Ullah S/O Amir Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
21. Ijaz Ali S/O Sher Afzal, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
22. Zeeshan Zafar S/O Zafar Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
23. Shahid Amin S/O Roohal Amin, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
24. Riaz Khan S/O Zirat Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
25. Sadar Alam Khan S/O Munir Ahmad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
26. Wajee Ul Hassan Sami S/O Anwar Ul Hassan , Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
27. Zia Ur Rehman S/O Rauf Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
28. Irfan Ullah S/O Sawab Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

29. Shah Nawaz S/O Haq Nawaz, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
30. Asif S/O Mukhtiar Ahmed, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
31. Muhammad Ilyas S/O Fazal Karim, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
32. Muhammad Kashif S/O Khadim Hussain, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
33. Anwar Nissar S/O Nisar Muhammad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
34. Ropoh Ullah S/O Rehmat Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
35. Sareer Ahamad S/O Fida Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
36. Wajid Amir S/O Iftikhar Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
37. Muhammad Shahab S/O Nawab Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
38. Mumrez Shah S/O Hussain Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
39. Sabeeh Ullah Shah S/O Mubarak Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
40. Maulood Ui Masood S/O Aman Ullan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
41. Babar Ali Khan S/O Maqbali Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
42. Hamid Khan S/O Masaood Ahmad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

43. Zohaib Akhtar S/O Muhammad Akhtar, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
44. Saadat Khan S/O Nasir Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
45. Imran Khan S/O Gul Akbar, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
46. Muhammad Nazir S/O Sher Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
47. Kaleem Ullah S/O Ihsan Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
48. Qaisar Khan S/O Aziz Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
49. Wahid Jan S/O Aman Ullah Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
50. Saif Ullah S/O Abdul Kareem Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
51. Babar Shehzad S/O Shakir Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
52. Imran Khan S/O Said Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
53. Shah Nawaz S/O Muhbat Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
54. Izhar Hussain S/O Saif Ur Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
55. Ismail Khan S/O Said Kamal, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
56. Zubair Shah S/O Sher Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

57. Zeeshan Khan S/O Gulfam, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
58. Manzoor Khan S/O Mirzali, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
59. Muhammad Ishtiaq Mehmood S/O Ghulam Mehmood, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
60. Faizan Khan S/O Mukarram Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
61. Jehangir Khan S/O Ajab Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
62. Rashid Menhas S/O Abdul Malik, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
63. Amin Jan S/O Malag Jan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
64. Izaz Ali Shah S/O Mubarak Ali Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
65. Aziz Ullah S/O Fazal Wahid, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
66. Syed Mahmood Hussain S/O Akhlaq Hussain, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
67. Attiq Ur Rehman S/O Aurangzeb, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
68. Muhammad Kamil Durrani S/O Muhammad Sohail Durrani, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
69. Ilyas Ahmad S/O Riaz Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
70. Nimat Ullah S/O Waris Khan Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

71. Siraj Khan S/O Shah Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
72. Noor Faraz S/O Noor Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
73. Zahoor Ahmad S/O Ameen Ur Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
74. Abdul Wahab S/O Toor Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
75. Sadar Ali S/O Khursheed Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
76. Said Rehman S/O Wazir Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
77. Zeeshan Sagheer S/O Sagheer Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
78. Safdar Khan S/O Hajid Waris Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
79. Amir Shehzad Khattak S/O Abdul Qayum Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
80. Muhammad Arif Khan S/O Nawaz Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
81. Abid Khan S/O Muhammad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
82. Saif Ul Islam S/O Muhammad Islam, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
83. Imran Hussain S/O Faqir Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
84. Yousaf Ali S/O Gul Zada, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

85. Muhammad Usman S/O Inayat Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
86. Ijaz Ullah S/O Rooh Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
87. Asim Ullah S/O Qismat Badshah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
88. Kabir Khan S/O Yousaf Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
89. Shaheen Shah S/O Jan Sahib, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
90. Akhtar Ali Shah S/O Ahmad Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
91. Muhammad Afsar Khan S/O Amir Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
92. Liaqat Ali S/O Gul Mast Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
93. Ajmal Khan S/O Purdil Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
94. Muhammad Yasir S/O Muhammad Tayyab, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
95. Saeed Ahmad S/O Ruhul Amin, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
96. Faheem Ahmad Khan S/O Irshad Ahmad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
97. Farmanudin S/O Misbah Uddin, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
98. Awais Alam S/O Mumtaz Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

99. Abdul Basit S/O Mumtaz Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
100. Waqar Khan Khalil S/O Bakhshish Khalil, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
101. Tariq Zaman S/O Gul Zaman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
102. Altaf Ur Rehman S/O Darwaish Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
103. Muhammad Arif S/O Nawab Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
104. Iqrar Zaman S/O Qamar Zaman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
105. Ajmal Khan S/O Rashid Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
106. Azmat Ullah S/O Aurangzeb Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
107. Khair Ullah S/O Rehman Jan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
108. Tariq Shah S/O Iqbal Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
109. Faiz Ur Rehman S/O Aziz Ur Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
110. Hafiz Abdul Majid S/O Almas Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
111. Khalil Ur Rehman S/O Noor Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
112. Kamran Khan S/O Behram, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

113. Imran Khan S/O Habib Ur Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
114. Salman Khan S/O Nehad Ali, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
115. Alamgir S/O Jehangir Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
116. Zohaib Khan S/O Mas Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
117. Amjad Khan S/O Ashraf Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
118. Gohar Rehman S/O Said Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
119. Hamid Iqbal S/O Miraj Ud Din, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
120. Naveed Alam S/O Javed Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
121. Shah Faisal S/O Abdul Akbar, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
122. Adil Ahmad S/O Saib Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
123. Bilal Khan S/O Sadar Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
124. Muhammad Shahab Daud S/O Abdul Wadood, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
125. Sohail Anwar S/O Abdul Latif, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
126. Muhammad Jalal S/O Muhammad Yousaf, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

127. Ibrar Hussain S/O Tilla Muhammad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

128. Irfan Ullah S/O Abdul Rahim, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

129. Murad Ullah S/O Shakir Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

130. Rehman Ullah S/O Haya Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

131. Muhammad Asif S/O Latif Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

132. Saeed Ullah S/O Rasool Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

133. Muhammad Bilal S/O Said Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

134. Naeem Ullah S/O Husam Uddin, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

135. Ashraf Zaman S/O Zaman Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

136. Farman Ullah S/O Khanzada, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

137. Shahid Ali S/O Noor Wali Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

138. Nadeem Khan S/O Utlas Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

139. Irfan Yousaf Afridi S/O Muhammad Yousaf Afridi, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

140. Irfan Wali S/O Wali Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

141. Usman Khan S/O Muhammad Irshad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
142. Mian Muhammad Sajid S/O Muhammad Latif, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
143. Zeeshan Ahmad S/O Mansoor Ahmed, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
144. Mohammad Nawaz S/O Zota Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
145. Muhammad Uzair S/O Abdul Qasim, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
146. Alamzeb S/O Farooq zeb, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
147. Sikandar Ahmad S/O Said Qamar Zaman Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
148. Zahid Ullah S/O Said Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
149. Ubaid Ur Rehman S/O Mujeeb Ur Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
150. Usman Ghani S/O Shafi Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
151. Nouman Shah S/O Hussain Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
152. Waseem Ahmad Khan S/O Astum Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
153. Usman zeb S/O Alam Zeb, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
154. Muhammad Irshad S/O Shamshed Khan Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

155. Saif Ullah S/O Aman Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
156. Mian Abdul Rehman S/O Mian Inyat Ur Rehman, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
157. Said Muhammad Musarat Shah S/O Said Ghulam Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
158. Zakir Ullah S/O Farhad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
159. Fazi-e-Rehman S/O Subahan Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
160. Awais Ahmad Khan S/O Masood Ahmad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
161. Muhammad Zubair S/O Zahid Hussain, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
162. Attiq Ur Rehman S/O Aman Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
163. Imran Ijaz S/O Ijaz Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
164. Muhammad Sajjad S/O Wahid Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
165. Kashif Ahmad S/O Shamshad Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
166. Nawab Khan S/O Parvez Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
167. Abdul Basit S/O Muhammad Ayub, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
168. Abdul Majid S/O Abdul Wahid, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

169. Sardar Hussain S/O Gul Hussain Afridi, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
170. Mubbashir S/O Abdul Rasheed, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
171. Aman Javed S/O Javed Saddique, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
172. Muhammad Hamid S/O Taj Muhammad, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
173. Muhammad Usman S/O Misri Khan Khalil, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
174. Irshad Rasool S/O Ghulam Rasool, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
175. Mian Usman KaKa Khel S/O Muhammad Ali Shah Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
176. Ayed Mussab Ali Shah S/O Syed Mussab Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
177. Fawad Ahmad S/O Sana Ullah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
178. Muhammad Javed S/O Said Haleem, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
179. Mian Farhan KaKa Khel S/O Muhammah Ali Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
180. Kamram Khan S/O Akram Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
181. Muhammad Arman Khan S/O Nadir Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
182. Muhammad Adil S/O Muhammad Bakhtiar, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.

183. Muhammad Waqas Khan S/O Muhammad Haris, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
184. Muhammad Hamayun S/O Muhammad Yaqoob, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
185. Abdul jamil Khalil S/O Abdul wakeel Khalil, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
186. Adnan Afzal S/O Rambail Afzal, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
187. Ayed Munawar Shah S/O Hayat Shah, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
188. Fayaz Ud Din S/O Shams Ud Din, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
189. Muhammad Khalid S/O Noor Zada, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
190. Irfan Ullah Khan S/O Saeed Gul, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
191. Zafar Ali Khan S/O Sher Ali Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
192. Siraj Ul Aslam S/O Sadrul Islam, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
193. Muhammad Saeed S/O Lal Mat Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
194. Inzamam Ul Haq S/O Muhammad Ayub, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.
195. Muhammad Israr S/O Masal Khan, Junior Village Secretary (BPS-9) LG&RDD, Peshawar.....**Respondents**

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO.1, 2, & 3)

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS:

- i. That the appellant in the instant case has no locus standi or cause of action to file the instant appeal.
- ii. That the appellant has not come to this honorable Service Tribunal with clean hands and has suppressed all relevant facts as available on record.
- iii. That the appeal is not maintainable in present form.
- iv. That the appeal of the appellant is barred by law and limitation.

OBJECTION ON FACTS:

- 1. Pertains to record.
- 2. Correct, up to the extent that though appellant was declared as successful candidate in the merit list yet he was at **(S.No-03)** in the merit list **(Annexure-A)** prepared for Village Council-144 Ahmed Khel and the topper at S.No.1, brother of the appellant was already appointed on 28-1-2016 **(Annexure-B)**.
- 3. Incorrect. As per policy in vogue circulated vide Director General letter No. Director(LG)3-1/Establishment/2013/3401,dated 26thJune, 2015 **(Annexure-C)**, Mr. Manzoor Khan, Senior Village Secretary already serving in the Department was adjusted against the vacant post of Village Secretary lying in the Village Council-144 Ahmed Khel. No fresh recruitment/appointment was made against the post.
- 4. Correct. Though the appellant has been appointed in compliance with the judgment of the honorable Peshawar High Court in writ petition **No-4362-P/2016**, yet Local Government & Rural Development Department has filed **CPLA No.597-P/2018** in the august Supreme Court of Pakistan against the said Judgment.
- 5. **Incorrect.** The appellant was appointed in compliance with the Peshawar High Court Judgment in writ petition No-4362-P/2016 **(Annexure-D)** after fulfillment of codal formalities, which took its legitimate time.
- 6. **Incorrect.** The appellant was appointed on 30.11.2018 **(Annexure-E)**. The inter-se seniority of the Village Secretaries was prepared strictly in accordance with the prescribed rules. No violation or any step was

ignored/neglected in the whole process regarding preparation of inter-se seniority of the Junior Village Secretaries (BPS-09).

- 7. **Correct**, the appellant filed a Departmental appeal against his position/status in the seniority list. The same was properly processed and disposed of on merit accordingly. **(Annexure-F)**
- 8. Incorrect.


OBJECTION ON GROUNDS:

- A. Incorrect**, the appellant has been treated in accordance with law & rules.
- B. Incorrect**, no irregularity/malafide has been committed by the Department being respondents. All the processes were carried out in a very transparent manner while preparing inter-se seniority of the Junior Village Secretaries (BPS-09).
- C. Incorrect**. The tentative inter-se Seniority list of Junior Village Secretaries (BPS-09) was prepared and displayed. The appellant submitted appeal against the same, which was properly processed and disposed of on merit, as the same was not based on facts.
- D. Incorrect**. the appellant was appointed on 30.11.2018, and his seniority will be fixed/counted from his date of appointment not from the date of advertisement of the post. Moreover, the Honorable Peshawar High Court has not given any direction regarding the fixation of the seniority of the petitioner in writ petition **No-4362-P/2016**.
- E. Incorrect**. As explained in **C&D**.
- F. Incorrect**. No discrimination has been made with the appellant in the process of preparation of inter-se seniority list, which was completely carried out strictly under the relevant rules.
- G. Incorrect**, the respondents have not violated any rule in the process of inter-se seniority list pertaining to the Junior Village Secretaries BPS-(09).
- H. Incorrect**. The appellant has not been deprived of his due right rather treated equally according to the rules.

I. Additional grounds will be added to the honorable Service Tribunal at the time of arguments on the appeal, if required.

PRAYERS:

It is, therefore, most humbly prayed that on acceptance of these joint Para-wise replies, the appeal being devoid of legal footings and merits may graciously be dismissed with cost.



**ASSISTANT DIRECTOR
LG&RDD, PESHAWAR
RESPONDENT NO.3**



**DIRECTOR GENERAL
LG&RDD, KHYBER PAKHTUNKHWA
RESPONDENT NO.2**



**SECRETARY
LG, E&RDD, KHYBER PAKHTUNKHWA
RESPONDENT NO.1**

13.1.2023

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

Service Appeal No. 03/2022

Kifayat Ullah Appellant

VERSES

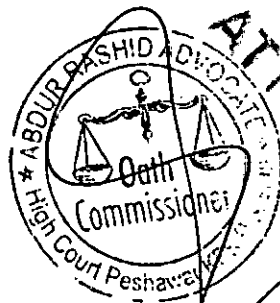
Govt of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

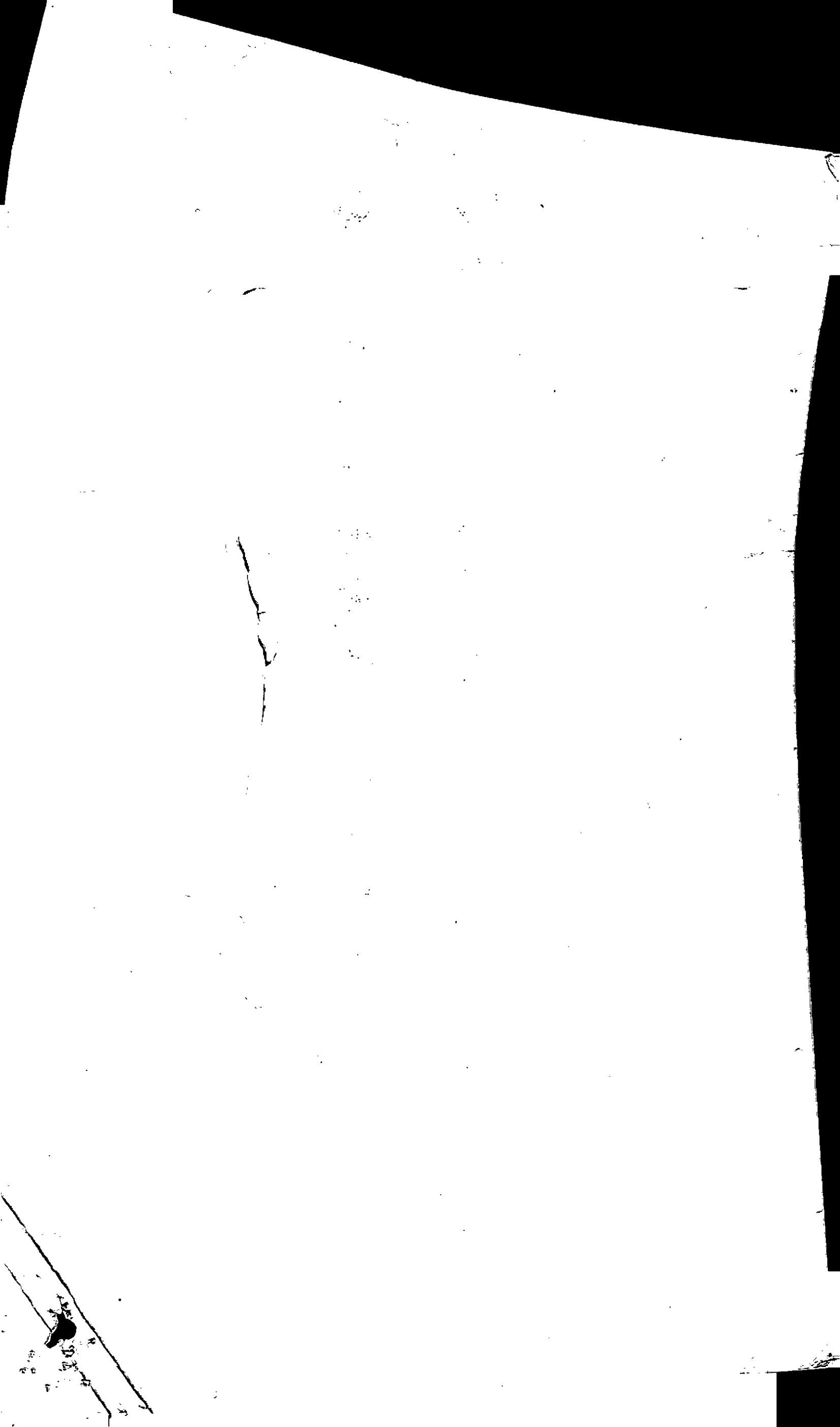
I, **Waheed Ur Rehman, Assistant Director Senior (BPS-18) LG & RDD, Peshawar/Respondent No.3** do hereby solemnly affirm and declare on oath that the content of this **joint Para-wise comments** are true and correct to the best of my knowledge and belief nothing has been concealed from this Honorable Court.

Waheed Ur Rehman

DEPONENT NO.3
CNIC:17301-5928097-5
Ph# 091-9211722



ATTESTED
94/2/2023



(32) B.C

Sl. No.	Name	Address	Name	Phone No.	Age	Height	Weight	Education	Remarks		
										Phone No.	Age
47.	Umer Bala	132. Yousaf Khel	Ajmal Khan								
		133. Umer Mera	Gohar Rehman	Abdar Khan	17301-4510805-1	61	5	0	66		
		134. Umer Bala-I	Wadaan Gul	Said Rehman	17301-9316657-9	78	6	0	84		
		135. Umer Bala-II		Qadar Gul	21201-8435856-1	67	5	0	72		
		136. Ghari Baghbanan							0	Shahid Ali S/O Noor Wali Khan	
		137. Ghari Faiz Ullah		Tariq Zaman					0	Israr Afzal S/O Fazal Dayan	
		138. Ghari Chandan		Gul Zaman	17301-0223159-1	78	4	0	82		
				Qadar Ahmad					0	Aqeel Afzal S/O Sher Afzal	
				Aqeel Afzal	Gul Abbas Khan	17301-7673746-9	78	7	0	85	
				Israr Afzal	Sher Afzal	17301-4095361-5	78	6	0	84	Place in VC- Ghari Faiz Ullah
				Shahid Ali	Fazal Dayan	17301-9828000-3	69	6	0	75	Place in VC-Urmar Bala-II
				Adnan Afzal	Noor Wali Khan	17301-3544364-5	68	7	0	75	Place in VC-Urmer Bala-I
		48.	Musa Zai	139. Musazai	Said Noor	Shaheem Nawaz	Ramsbail Afzal	17301-5105431-3	62	7	0
Hamid Zaman	M. Ibrar					17301-9558031-5	59	6	0	65	
Mian Atif Nisar	Awal Sher					17301-3530949-9	56	6	0	62	
M. Aakif	Nisar Ud Din					17301-4454135-7	78	7	0	85	
Majid Khan	M. Shah					17301-8050500-5	76	5	0	83	
M. Ikram Ud Din	Sanab Gul					17301-2233464-7	70	6	0	76	
Suleman	Mufarrah Ud Din					17301-9462969-1	70	7	0	77	
Ubaid Ullah	Sabir Zada					17301-6453088-7	70	5	0	75	
Dehaq Ahmad	Inayat Ullah					17301-0668155-7	62	4	0	66	
M. Tayyab	Jan M.					17301-2043430-7	61	6	0	67	
M. Tayyab	Qasam Khan					17301-0308861-5	59	4	0	63	
Sheheryar Khan	Atta Khan					17301-7007482-3	53	7	0	60	
Aman Ullah	Haji Sifat Ullah Khan					17301-5250436-7	48	6	0	54	
Shaheryar Khan	Samen Khan			17301-8942744-5	78	7	0	85			
Ihsan Ullah	Ishfaq Khan			17301-7594927-9	78	5	0	83			
Abdullah	Zarbat Khan			17301-7597680-7	76	8	0	84			
M. Sheraz	Zarbat Khan			17301-4916711-7	62	6	0	68			
Zubair Khan	M. Hussain			17301-4514653-3	70	6	0	76			
Irfan Ullah	Abdul Qayum			17301-5514308-3	61	6	0	67			
Saad Ullah	Saeed Gul			17301-9243362-5	70	4	0	74			
M. Ilyas	Saeed Gul			17301-3851330-7	53	5	0	58			
	Fazal Karim			17301-9584150-1	61	7	0	68			
							0	Tariq Imran S/O M. Rehan			
49.	Bazid Khel	141. Phando Bala	Ashfaq Khan	M. Tariq Imran	M. Rehan	17301-7850104-9	78	7	0	85	Place in VC-Scheme Chowk
				Kilayat Ullah	M. Rehan	17301-8012652-5	59	6	0	65	
				Sharif Hussain	Janas Khan	17301-5678693-9	68	4	0	72	
				Sher Ahmad Khan	Rahmat Ullah	17301-9656255-1	59	6	0	65	ASSISTANT DIRECTOR LOCAL GOVT. PESHAWAR Development Urban
50.	Sheikh Muhammadi	142. Kandi Malakanan		Naseem Ullah	Khan Sher	17301-6054930-7	79	8	0	87	
		143. Scheme Chowk		Fazal Manan	Abdul Jalil	17301-6027796-3	78	7	0	85	
		144. Ahmed Khel	Manzor Khan	Rooh Ul Amin							
		145. Marozai Deh Bahader									
		146. Sheikh Muhammadi									



33

B.C

OFFICE OF THE
DEPUTY COMMISSIONER / CHAIRMAN
DISTRICT RECRUITMENT COMMITTEE.
PESHAWAR.

Dated Peshawar the 28th January, 2016.

OFFICE ORDER:

No.716-21/-Consequent upon the recommendations of the Selection & Recruitment Committee of staff for Village / Neighborhood Councils in its meeting held on 13th January -2016, **Mr. Muhammad Tariq Imran S/O Muhammad Rehan R/O Ahmad Khel U,C Bazid Khel, Peshawar** as Village Secretary in BPS-07 plus usual Allowances as admissible under the rules, against the vacant post in the office on the Assistant Director LG&RDD, Peshawar.

The appointment of the candidate will be on regular basis subject to the following condition:-

1. He will get pay minimum of BPS-07 (7490-415-19940) plus usual allowance as admissible under the rules and will be entitled to annual increment as per existing policy.
2. He will produce Medical fitness/ age Certificate from medical superintendent Services Hospital Peshawar.
3. He will be governed by the Khyber Pakhtunkhwa Civil Servant Act-19736 and all the laws applicable to the Civil Servants and Rules made there -in.
4. He will, for all intents and purpose, be civil servants, in the prescribed manner as per existing policy.
5. His employment in this office is purely temporary for probation period one year extended upto two years and his services shall be liable to be terminated without assigning any reason on one month prior notice or on the payment of one month salary in lieu of the notice period. In case he wishes to resign at any time one month prior notice be necessary or in lieu thereof one month pay will be forfeited or deposited by him.
6. His services shall be considered terminated if any discrepancy is found during process verification of documents / experience etc.

SD/-
DEPUTY COMMISSIONER,
PESHAWAR

Endst: No. & Date Even.

Copy forwarded to the:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, LG&RDD, Khyber Pakhtunkhwa, Peshawar.
3. The Assistant Director, LG&RDD, Peshawar.
4. The PS to Minister, LGE&RDD, Khyber Pakhtunkhwa.
5. P/File
6. Mr. Muhammad Tariq Imran S/O Muhammad Rehan R/O Ahmed Khel Peshawar.

[Signature]
ASSISTANT DIRECTOR
Local Govt. & Rural
Development Department
Peshawar

SD/-
DEPUTY COMMISSIONER,
PESHAWAR



(VA) B.C.

**OFFICE OF THE DIRECTOR GENERAL
LOCAL GOVERNMENT & RURAL DEVELOPMENT
DEPARTMENT KHYBER PAKHTUNKHWA**

No. Director(LG)3-1/Establishment/2013/3401
Dated Peshawar, the 26TH June, 2015

To

All Assistant Directors,
LG&RDD, Khyber Pakhtunkhwa.

Subject: **ADJUSTMENT OF SURPLUS STAFF OF LOCAL COUNCILS AS
SECRETARY AND CLASS IV OF VILLAGE/ NEIGHBOURHOOD
COUNCILS**

Please, refer to the subject noted above and to enclose herewith list of surplus staff of District Council and Municipal Committees of your respective district for adjustment against the vacant post of village secretary and Class-IV, Village/Neighborhood Councils.

You are further directed to post the existing secretaries and Naid Qasid of Union Council in their native village councils or in the nearest Village/ Neighborhood Councils if the native Village/ Neighborhood Councils is filled and there after the surplus staff (BPS-07 and Naib Qasid) may be adjusted in their native village, or if the same is filled then in the nearest vacant VC/NC.

The Assistant Directors LG&RDD are further directed to involve the concerned CCOs/CMOs of the respective districts for helping them in the adjustment process of surplus staff.

The above instructions may be followed with letter and spirit.


Report compliance and the final list of remaining vacancies within three working days i.e on or before Wednesday 01/07/2015 positively.

Note:- All Assistant Directors are required to consider the list of surplus staff of District Council and MC of their respective district only.

Director General, LG & RDD

Cc:

1. PSO to the Chief Minister, Khyber Pakhtunkhwa.
2. Secretary, LCB, Khyber Pakhtunkhwa.
3. PSO to the Senior Minister, Khyber Pakhtunkhwa.
4. PS to Secretary, LG & RDD, Khyber Pakhtunkhwa.


**ASSISTANT DIRECTOR
Local Govt. & Rural
Development Department**

Director General, LG & RDD

11/8

Annexure - Z

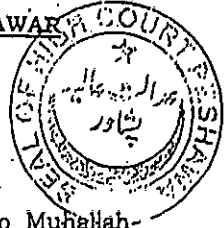
Annex-D P-22

47

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

4362-A

Writ Petition No. ___/2016



Kifayat Ullah S/o Muhammad Rchan Khan R/o Muhalah
Garhi Khel Ahmad Khel, Tehsil and District
Peshawar.....(Petitioner)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Local Government, Election and Rural Department, Khyber Pakhtunkhwa, Civil-Secretariat, Peshawar.
2. Chairman Local Council Board, Khyber Pakhtunkhwa, Hayatabad, Peshawar.
3. The Director General Local Government Election and Rural Department, Peshawar.
4. The Deputy Commissioner/ Chairman District Recruitment Committee, Deputy Commissioner Office, Khyber Road, Peshawar.
5. Manzoor Khan S/o Sardar Khan R/o Kanday Malakanan, Peshawar.....(Respondents)

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

ATTESTED
Deputy Registrar
18 NOV 2016

FILED TODAY
Deputy Registrar
18 NOV 2016

WP4362P2016-GROUNDS

Writ Petition

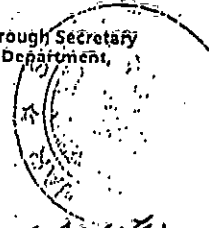
P-23

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JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

WP No.4362-P of 2016

"Kifayat-Ullah Vs. Government of KPK through Secretary
Local Government, Election and Rural Department,
Peshawar etc"



JUDGMENT

Date of hearing 22.05.2018

Petitioner by: Sofia Noreen Advocate

Respondent(s) by: Muhammad Iqbal Khan Advocate

IKRAMULLAH KHAN, J.- Through the instant
Writ Petition, under Article 199 of the Constitution of
the Islamic Republic of Pakistan, 1973, the petitioner
(Kifayat-Ullah) has made the following prayer: -

"It is therefore, humbly prayed
that on acceptance of this Writ
Petition, appropriate writ may
kindly be issued, declaring the
appointment of Manzoor
Khan/Respondent No.5 on the
post of Secretary Village Council
to be illegal, without lawful
authority, without jurisdiction,
malafide and may kindly be
cancelled, and the petitioner may
kindly be appointed on the post of
Secretary Village Council-144
Ahmad Khel being qualified and
eligible".

2

P-24



02. In essence, on 27.06.2015, respondent/department advertised some post of Village Secretary Council. Petitioner being eligible and qualified, applied for the same post. Written test was conducted by the NTS, which was declared by the petitioner. After conducting test and interview by the respondent/department, respondent No.5 namely Manzoor Khan was appointed as Secretary at Village Council 142 known as Kande Malakanañ instead of the petitioner who is permanent resident of Village Council 144 known as Ahmad KheL. Feeling aggrieved by the appointment of respondent No.5, petitioner time and again approached the respondent/department but in vain. Hence, the instant Writ Petition.

03. Learned counsel for the petitioner contended that petitioner had successfully qualified the required test and interview for the post of Village Secretary but he was not appointed by the respondents without any feasible explanation.

04. Further stated that no one shall be discriminated, insofar as appointment to public posts are concerned, if anyone is otherwise eligible and qualified for the public post.

Handwritten mark resembling a checkmark or the number '2'.

TESTED
 EXAMINED
 [Signature]

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05. On the other hand, learned could for respondent admitted that although petitioner had qualified the required test and interview but was not appointed as there was no any vacant post of Village Secretary in the concerned Village Council as private respondent was already adjusted on the only vacant post of Village Council No.144 Ahmad Khel, according to surplus policy of the government.

06. We have heard learned counsel for the parties in light of the available record.

07. The record reveals that according to Memo dated 26.06.2015, issued by the Director General, Local Government Rural Development Khyber Pakhtunkhwa it has been directed that all the surplus staff of District Council and Municipal Committees shall be first adjusted on all vacant post without the respective Union Councils and thereafter, if any vacancy was still existed, fresh candidates shall be appointed on the respective vacant post, which reads as:-

OFFICE OF THE DIRECTOR GENERAL
LOCAL GOVERNMENT & RURAL DEVELOPMENT
DEPARTMENT KHYBER PAKHTUNKHWA
No. Director (LG) 3-1/Establishment/2013/3401
Dated Peshawar, the 26th June, 2015

To

All Assistant Directors,
LG& RDD, Khyber Pakhtunkhwa.

P-26



Subject: ADJUSTMENT OF SURPLUS STAFF OF LOCAL COUNCILS AND SECRETARY AND CLASS IV OF VILLAGE NEIGHBOURHOOD COUNCILS.

Please, refer to the subject noted above and to enclose herewith list of surplus staff of District Council and Municipal Committees of your respective district for adjustment against the vacant post of Village Secretary and Class-IV, Village/Neighborhood Council.

You are further directed to post the existing secretaries and Naib Qasid of Union Councils in their native village councils or in the nearest Village/Neighborhood Councils if the native Village/Neighborhood Councils is filled and there after the surplus staff (BPS-07) and (Naib Qasid) may be adjusted in their native village, or if the same is filled than in the nearest village council.

The Assistant Directors LG&RDD are further directed to involve the concerned DCOs/CMOs of the respective districts for helping them in the adjustment process of surplus staff.

The above instructions may be followed with letter and spirit.

Report compliance and the final list of remaining vacancies within three working days i.e. on or before Wednesday 01.07.2015 positively.

Note: All Assistant Directors are required to consider the list of surplus staff of District Council and MCOs of respective district only.

Director General, LG&RDD

1. PSO to the Chief Minister, Khyber Pakhtunkhwa.
2. Secretary, LCB, Khyber Pakhtunkhwa.
3. PSO to Senior Minister, Khyber Pakhtunkhwa.
4. PS to Secretary, LG&RDD, Khyber Pakhtunkhwa.

Director General, LG&RDD

08. Record further reveals that test and interview for the post under consideration was held much after the target date mentioned in the directives/memo dated 26.06.2015.

09. No any first appointment order of the private respondent had been placed on record in order to determine that when and how the private respondent was previously appointed while the

ATTESTED
EXAMINER
Peshawar High Court
01.07.2015

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adjustment order of the private respondent is also not available on record to determine the veracity of the comments submitted by the respondents, which itself reveals that material facts were concealed purposely by the respondent by filing vague kind of comments.

10. The required test had conducted on 01.01.2016, while the target date, for adjustment of surplus employees was 01.07.2015, meaning thereby that on the day of test for the post under consideration, it was vacant but despite the fact that petitioner had qualified for the post was not appointed which clearly shows the factum of nepotism and other consideration, which had suffered the petitioner and had illegally deprived him of his vested legal right of appointment.

11. Insofar as the adjustment of private respondent on the post of Village Secretary Village Council No.144 namely Ahmad Khel is concerned, respondent had not denied that he was not resident of Village Council No.142 namely Kandi Malakanan. So in accordance with the directives dated 26.06.2015, at most he would have been adjusted on the vacant post of Village Council No.142 but his

ATTESTED
EXAMINER
Pondicherry High Court
07.06.2016

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adjustment in Village Council No.144, itself is violation of policy of the government, circulated through Memo dated 26.06.2015.

12. No one shall be accommodated on the cost of rights of an, eligible and deserving candidates.

13. Therefore, this Writ Petition is admitted and allowed accordingly. Respondents are directed to appoint the petitioner on the vacant post of Village Council No.144 as soon as possible but not later than 30-days from the date of announcement of this Judgment.

The case of private respondent shall be dealt with in accordance with law.

Announced.
22.05.2018.

JUDGE

JUDGE

08
Hon'ble Mr. Justice Anand K. Chaudhary
Hon'ble Justice Mr. Parasram Mishra
JUDGE

225/18

23704
237574
Presentation of Application
237
287
Operation of Court
2412/16
2417/16
2417/16
C-118

CERTIFIED TO BE TRUE COPY
Preserved in the Court's Record
with the original file
The Commissioner of District Court
C-1, JALPAIGURI
17 JUL 2018

Annexure - E P- (29) (36)
OFFICE OF THE
ASSISTANT DIRECTOR
LOCAL GOVT & RURAL DEVELOPMENT
DEPARTMENT PESHAWAR


Dated Peshawar.30.Nov,2018.

OFFICE ORDER:

No. ADLG-P(19-1)Recdt/2018/Appointment/2018 /2552-61
Consequent upon the decision/ Judgment of Peshawar High Court in writ Petition No.4362-P/2016,Dated 22-05-2018. Mr. Kifayat ullah s/o Muhammad Rehan, R/O Muhallah Garhi Khel, Ahmad Khel, Tehsil & District Peshawar, is hereby conditionally appointed as Junior Village Secretary BPS-09 (11770-730-33670) against the vacant post in the Office of the Assistant Director, Local Govt. & Rural Development Department, Peshawar till the final decision of CPLA No.597-P/2018,in the Supreme Court of Pakistan, with immediate effect.

Terms & Conditions:

1. He will get pay minimum of BPS-09 (11770-730-33670) plus usual allowance as admissible under the rules and will be entitled to annual increment as per policy.
2. He will produce Medical fitness/age certificate from Medical Superintendent, Services Hospital Peshawar.
3. He will be governed by the Khyber Pakhtunkhwa Civil Act -1973 and all the laws applicable to Civil Servants and Rules made there -in.
4. He will, for all intents and purposes, be civil servant, in the prescribed manner as per existing policy.
5. His employment in this office is purely temporary for probation of one year extended upto two years and his services shall be liable to be terminated without assigning any reason on one month prior notice or on the payment of one month salary in lieu of the notice period. In case he wishes to resign at any time one month prior notice be necessary or in lieu therefore one month pay will be forfeited or deposited by him.
6. His services shall be terminated if any discrepancy is found during process of verification of documents / experience et al.


Assistant Director (Sr.)
LG&RDD, District Peshawar.

Endst. Even No. and Date.

Copy is forwarded for information and necessary action to the

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Registrar, Peshawar High Court, Peshawar.
3. Deputy Commissioner, Peshawar.
4. Section Officer (Estt), LG&RDD, Khyber Pakhtunkhwa, Peshawar.
5. Assistant Director (Jr), LG&RDD, Peshawar.
6. Medical Superintendent, Services Hospital, Peshawar.
7. PA to Director General, LG&RDD, Khyber Pakhtunkhwa, Peshawar.
8. Accountant, LG&RDD, Peshawar.
9. Official Concerned.
10. Office record file.


Assistant Director (Sr.)
LG&RDD, District Peshawar.



OFFICE OF THE
ASSISTANT DIRECTOR
LOCAL GOVT & RURAL DEVELOPMENT
DEPARTMENT PESHAWAR


No.ADLG-P(1-3)/Estab/ 1698
Dated: 29-11-2021.

To,

Mr. Kifayat Ullah,
Junior Village Secretary,
LG&RDD, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE FINAL SENIORITY LIST OF JUNIOR VILLAGE SECRETARY VCS/NCS PESHAWAR


Reference your observations dated 18th June 2021 on the subject, it is submitted that after thorough investigation of your case, your application can't be entertained as per rules and regulations. You are thus retained at S.No 218 of the Final SeniORITY List of Junior Village Sectary (BPS-09). Moreover, as per the judgement of Peshawar High Court Peshawar, in your writ petition No.4362-P 2016, dated 22/5/2018, no relief regarding back benefit and seniORITY has been granted to you.

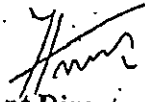

Assistant Director (Sr)
Local Govt & RDD
Peshawar

Even No. & Date

Copy of the above is forwarded to the:

1. PA to Directorate General LG&RDD, Khyber Pakhtunkhwa.
2. Office File.


ASSISTANT DIRECTOR
Local Govt. & Rural
Development Department
Peshawar


Assistant Director (Sr)
Local Govt & RDD
Peshawar