

Service Appeal No. 4826/2021

17.01.2023 Appellant alongwith counsel present.

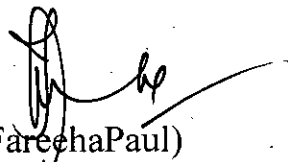
Naseer Ud Din Shah learned Assistant Advocate General alongwith Adnan Rasool SDFO for official respondents present. Counsel for private respondents present.

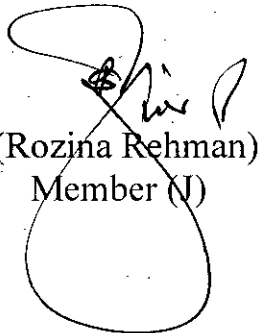
Learned counsel for the appellant submitted an application for withdrawal of the instant appeal as grievances of the appellant have been redressed.

In view of the above, instant appeal is hereby dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

17.01.2023


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

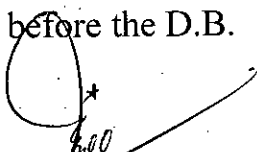
SCANNED
KPST
Peshawar

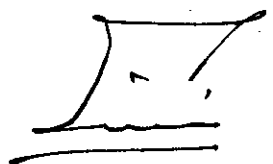
21.11.2022

Appellant in person present. Mr. Muhammad Jan, District Attorney for official respondents present. Private respondents No. 3, 4, 6 & 11 in person present.

Appellant requested for adjournment on the ground that his counsel is not available today due to strike of lawyers. Adjourned. To come up for arguments on application as well as main appeal on 16.01.2023 before the D.B.

SCANNED
KPST
Peshawar


(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)


16.01.2023

Appellant alongwith counsel present.

Naseer Ud Din Shah learned Assistant Advocate General alongwith Adnan Rasool SDFO for official respondents present. Counsel for private respondents present.

Learned counsel for the appellant submitted an application for withdrawal of the instant appeal as grievances of the appellant have been redressed.

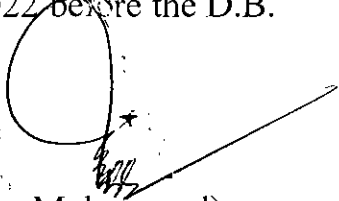
Miss. Fareeha Paul learned Member (Executive) is on leave today, therefore, case is adjourned to 17.01.2023 before D.B.


(Rozina Rehman)
Member (J)

04.11.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Irfan Ullah, Sub-Divisional Forest Officer alongwith Mr. Muhammad Jan, District Attorney for official respondents No. 1 & 2 and clerk of learned counsel for private respondents No. 3, 4, 6 & 11 present and submitted reply of the application, which is placed on file.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on application as well as main appeal on 21.11.2022 before the D.B.

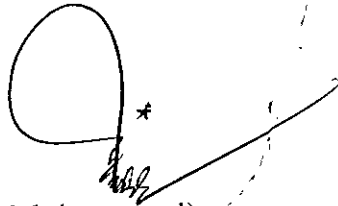

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

12.10.2022

Appellant alongwith his counsel present. Mr. Muhammad Irfan Ullah, Sub-Divisional Forest Officer alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for official respondents No. 1 & 2 present. Private respondents 4, 6 & 7 alongwith their counsel for private respondents 3 to 11 present.

Learned counsel for the appellant submitted an application seeking amendment in prayer made in the appeal. Copy of the same handed over to learned Assistant Advocate General as well as learned counsel for private respondents, who sought time for submission of reply. Adjourned. To come up for reply of the application as well as arguments on the same as well as main appeal on 04.11.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)


29.09.2022

Appellant in person present.

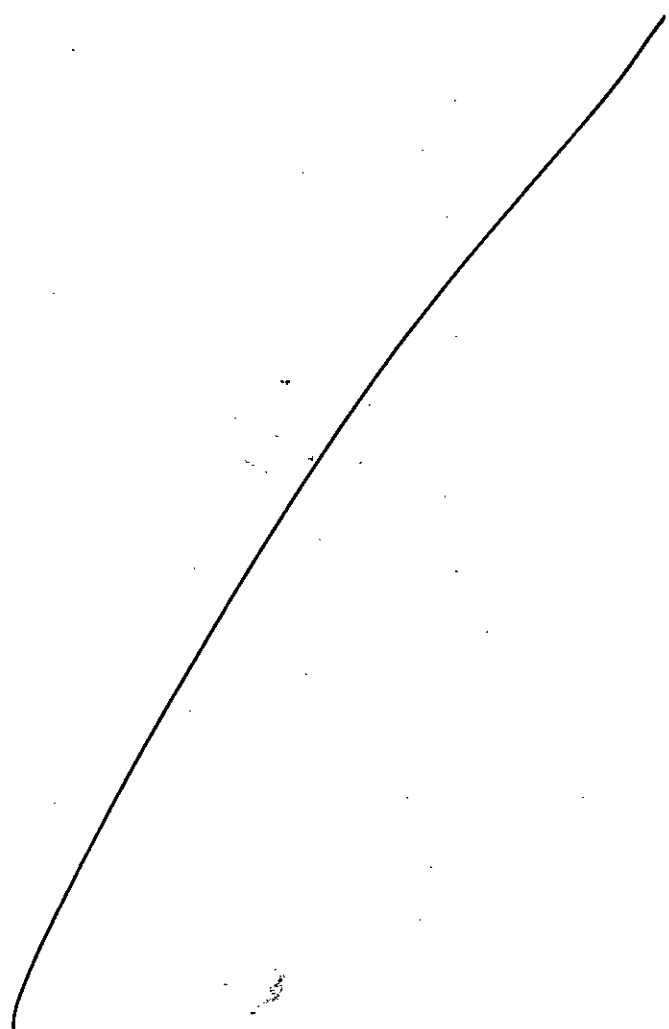
Muhammad Jan, learned District Attorney alongwith Irfan Ullah Muhammadi SDFO for official respondents No.1 & 2 present. Private respondents No.3 to 11 present through counsel.

Again a request for adjournment was made on the ground that learned counsel for appellant is busy in Service Tribunal Camp Court, D.I.Khan. Appellant is given last chance with direction to make sure the presence of his counsel at Principal Seat for arguments on 12.10.2022 before D.B, failing which, appeal will be decided in the light of available record.

Adjourned accordingly.


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)



13-5-22

Proper DB not available the case is
adjourned on 26-7-22

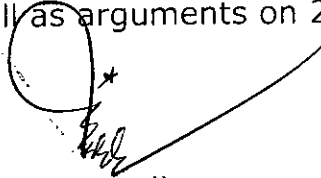
26-7-22


Proper DB not available to come
up for the same as before on 21/9/22
Redolent

21.09.2022

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 & 2 present. Private respondent No. 8 alongwith learned counsel for private respondents No. 8 to 11 present and stated at the bar that they have submitted an application for deletion of name of private respondents No. 7 to 10 from the panel of respondents, which is yet pending adjudication.

Appellant requested for adjournment on the ground that his counsel is busy in Service Tribunal Camp Court Abbottabad. Adjourned. To come up for reply of the application for deletion of name of private respondents No. 7 to 10 as well as arguments on 29.09.2022 before the D.B.


(Mian Muhammad)
Member (Executive)


(Salah-Ud-Din)
Member (Judicial)

03.11.2021

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Former made a request for adjournment in order to submit rejoinder; granted. To come up for rejoinder/arguments on 10.01.2022 before D.B.



(Rozina Rehman)
Member (J)

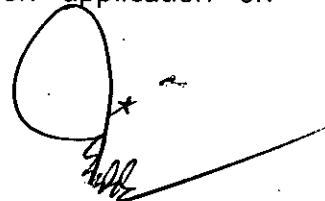


Chairman

10.01.2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney for respondents present. Mr. Tanveer Ahmad Din, Advocate present and submitted wakalatnama on behalf of private respondents No. 3,4,6,7 and 11 as well as submitted an application for setting aside ex-parte proceedings and order dated 15.10.2021 against respondents No. 3,4,6,7 and 11 which is placed on file. A copy of the same is also handed over to the appellant.

Due to non-availability of Hon'able Member (J), the case could not be heard. Adjourned. To come up for arguments on main appeal as well as reply/arguments on application on 18.02.2022 before D.B.



(MIAN MUHAMMAD)
MEMBER (E)

18-2-22

*due to Retirement to the Hon'ble Chairman
the case is adjourned to come up for the
same as before on 13-5-22*



12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.


Chairman

Stipulated period passed reply not submitted.


15.10.2021

Appellant with counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Syed Javid Ali S.D.F.O for official respondents No.1 & 2 present and submitted reply. Nemo for private respondents No.3 to 11, hence placed ex-parte.

An application has been submitted for restraining the respondents from finalizing the promotion cases from Forester to Deputy Ranger. Notice of the application be also given to the respondents. To come up for arguments on 03/11/2021 before D.B.

In the meanwhile, the respondents shall not finalize the promotion to the post subjudice before the Tribunal.


(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

08.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all legal and just objections. 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 in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 15.10.2021 before the D.B.

Appellant Deposited
Security & Process Fee

[Handwritten signature]
8/6/21


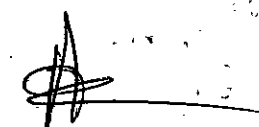
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Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4876 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/04/2021	<p>The appeal of Mr. Tahir Ayub resubmitted today by Syed Noman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p>
2-	27/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/06/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Tahir Ayub Forest Guard Lower Seeran Forest Division Shinkyari received today i.e. on 25/01/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- 1- Memorandum of appeal may be got signed by the appellant.
- ②- Copy of promotion order mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Appeal has not been flagged/marked annexures' marks.
- 4- Annexures of the appeal may be attested.
- 5- 13 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 205 /S.T.

Dt. 28/01 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv. Pesh.

Respected Sir,
All objections removed, file re-submitted.


BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2021


Tahir Ayub

V/S

Forest Deptt


INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	1-4
2.	Copy of service book	A	05-19
3.	copy of 1962 service rules	B	20-21
4.	Copy of seniority list	C	22
5.	Copy of seniority list	D	23-26
6.	Copy of departmental appeal	E	27-28
7.	Copy of rejection order	F	29
8.	Copy of judgment	G	30-35
9.	Copy of memorandum	H	36-39
10.	Copy of instruction	I	40-41
11.	vakalatnama	---	42


APPELLANT

Tahir Ayub

THROUGH:


SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)

Cell No: 0306-5109438

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 4826 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1633

Dated 25/1/2021

Mr. Tahir Ayub Forest Guard
Lower Seeran Forest
Division Shinkiyari, Mansehra

(Appellant)

VERSUS

1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad.
2. The Divisional Forest Officer Siran Forest Division, Mansehra.
3. Muhammad Nazir, Forester, Siran Forest Division, Mansehra.
4. Muhammad Alam Forester, Siran Forest Division, Mansehra.
5. Ali Ahmad Forester, Siran Forest Division, Mansehra.
6. Muhammad SadiQ Forester, Siran Forest Division, Mansehra.
7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra.
8. Muhammad Naseem Forester, Siran Forest Division, Mansehra.
9. Muhammad Shabir Forester, Siran Forest Division, Mansehra.
10. Muhammad Riaz Forester, Siran Forest Division, Mansehra.
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra.

Filed to-day

Registrar

25/01/2021

Re-submitted to-day
and filed.

Registrar

14/4/2021

(Respondents).

.....
APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974
AGAINST THE IMPUGNED SENIORITY LIST DATED

(2)

31.12.2019, WHICH IS NOT PREPARED AS PER SECTION 8 OF CIVIL SERVANT ACT, 1973 AND AGAINST REJECTION ORDER DATED 06.11.2020 RECEIVED BY THE APPELLANT ON 28.12.2020 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED WITHOUT SHOWING ANY COGENT REASON.

PRAYER

ON THE ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY PLEASE BE DIRECTED TO CORRECT THE IMPUGNED SENIORITY LIST OF APPELLANT FROM THE DATE OF JOINING SIRAN DIVISION ACCORDING TO 1962 RULES AND DIRECTED THE RESPONDENTS DEPTT TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF FORESTER FROM THE DATE JUNIOR WAS PROMOTED. ANY OTHER REMEDY WITH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER MAY ALSO BE AWARDED THE FAVOR OF THE APPELLANT.

RESPECTFULLY SHEWETH

FACTS

1. That the appellant is serving as Forest Guards, in Siran forest Division Mansehra and working with full zeal and zest with entire satisfaction of his superiors.
2. That the appellant is serving as forest guard in siran forest division Mansehra from 1993 while private respondents were transferred to siran forest division from other division i.e Kaghan etc, after the appellant which is evident from the service book. **Copy of the service books is attached as annexure-A.**
3. That all the forest guards who were transferred from the other division in appellant's division. According to 1962 rules all that forest guards kept at the bottom of the seniority list and juniors to the appellant. But despite that all the juniors were shown senior and also promoted to the post of forester but the appellant kept

deprived from the same which is evident from the seniority list dated 31.12.2019 of forester. **Copy of 1962 rules and seniority list is attached as annexure-B & C.**

4. That when 31.12.2019 seniority has been issued the appellant know about the fact that all juniors to the appellant not reflected in the same and shown in the seniority list of forester, so when all the efforts of the appellant went in vain. The appellant filed departmental appeal for the purpose of proper seniority and promotion but the same was rejected without showing any cogent reason vide order 06.11.2020 received by the appellant on 28.12.2020. Hence the appellant constrained to file this present appeal on following grounds amongst others. **Copy of seniority list, departmental appeal and rejection order is attached as annexure-D, E,& F.**
5. That the appellant come to this august tribunal on the following grounds amongst others.

GROUNDS


- A. That the impugned seniority list and rejection order dated 06.11.2020 is against the law, illegal, unlawful, without and lawful authority, thus calling interference of this learned tribunal.
- B. That the impugned seniority list is against the norms of service law and principles of natural justice and dictums of the apex courts.
- C. That the impugned seniority list is the worst example of favoritism, nepotism and colorful exercise of powers which is not warranted under law.
- D. That according to Section-8 of the Civil Servant Act 1973 and section-17 of APT Rules 1989, it is the legal right of every civil servant to properly placed in seniority list according to his seniority position, but the same benefits was not extended to the appellant which is the violation of law and rules.
- E. That the appellant was not treated according to the law and rules and has been deprived from his legal right of seniority in arbitrary manner without fault on his part.

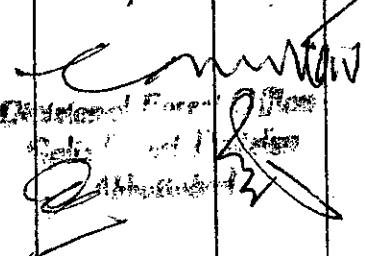
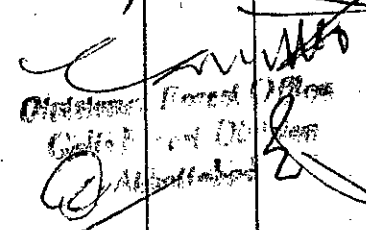


- F. That the appellant is serving as forest guard in siran forest division Mansehra from 1993 while private respondents were transferred to siran forest division from other division i.e Kaghan etc, after the appellant i.e 2002 etc which is evident from the service book. So according to 1962 rules all that forest guards kept at the bottom of the seniority list whom was transferred from other division to Siran Division and juniors to the appellant.
- G. That the same nature appeal was decided by the Hon'able tribunal in favor of the private respondent, as the seniority according to 1962 rules maintained at divisional level and the employee transferred from other division kept at bottom. So the, the present appellant also claimed the said relief which was decided in favor of private respondent in appeal no 1451/2013. So appellant also entitled the same relief. **Copy of judgment is attached as annexure-G.**
- H. That, so, according to office memorandum 2014 the seniority of the employees who was transferred from one division to other so the seniority of employee whom was transferred from other division, their seniority shall be maintained at bottom level. This principal was also supported by the forest department and issued instruction on 2nd August 2019. **Copy of memorandum 2014 and office instruction 2019 is attached as annexure-H & I.**
- I. That the appellant craves permission of this honorable tribunal to rely on other grounds at the time of arguments and produce any additional document if required in support of instant service appeal.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
Tahir Ayub

THROUGH:


SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)

9. Name and designation of Head of the office or other Attesting officer in column 8	10. Date of termination or appointment	11. Reason of termination (such as promotion, transfer dismissal etc.)	Signature of the Head of the office or other Attesting Officer	13. LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		
				فصلت کی نوعیت و معیار	Period Govt. to which debitable		
	تاریخ انقطاع ملازمت	وجبات انقطاع ملازمت یا برطرفی	دستخط افسر مجاز		چار ماہ تک کی رخصت کیلئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	سزا یا جزا یا غیر مناسبت کارکردگی کا ریکارڈ
		Allowed annual increment & pay fixed in revised pay scale in accordance with Finance Dept. Notification No. 1-1/2001 D 22-10-2001.	 Divisional Forest Officer Siron Forest Division			Service from 01-01-2001 to 31-12-2001 verified from salary bills.	
		Transferred to Siron Forest Division vide O.F.A.O No 144 D 2/2/02 & reported departure on 9/5/2002.	 Divisional Forest Officer Siron Forest Division			Service from 1-1-2002 to 30-4-2002 verified from salary bills.	
		Joined Siron Forest Division Manshera on the 14-5-2012 (AN).	 Divisional Forest Officer Siron Forest Division Manshera.			01-05-2012 31-12-2012 verified from salary bills.	
	30/2/12	Allowed annual increment	 Divisional Forest Officer Siron Forest Division MANSHERA.				

APPROVED

S. P. Singh

6

8	9	10	11	12	LEAVE		14	15
Signature of Government Servant	Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or reward or praise of the Government Servant
						Period	Government to which debitable	
								Services from 1-1-2000 to 31-12-2000 verified from salary bills.
			Transferred to Siran Division vide CP App No. 161 dt 30/7/2002 reported his departure on 11-5-2002 (A.N.)					Services from 1-1-2001 to 31-12-2001 verified from salary bills.
								Services from 01-01-2002 to 31/05/2002, verified from salary bills.
								Services from 01-06-2002 to 31-12-2002 verified from salary bills.
			Allowed annual increment					Services from 1-1-03 to 31-12-03 Verified from the salary bills.
			Allowed annual increment					

Transferred to Siran Division vide CP App No. 161 dt 30/7/2002 reported his departure on 11-5-2002 (A.N.)

Divisional Forest Officer
Siran Forest Division
B. S. Singh

Divisional Forest Officer
Siran Forest Division
B. S. Singh

Transferred to Siran Forest Division on 1-6-2002 (IA).

Divisional Forest Officer
Siran Forest Division
B. S. Singh

Services from 01-06-2002 to 31-12-2002 verified from salary bills.

30/2002




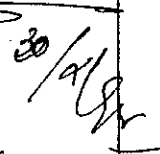
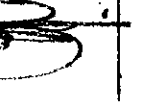
Services from 1-1-03 to 31-12-03 Verified from the salary bills.

DFO, Siran Manshra.


30/2003

Divisional Forest Officer
Siran Forest Division
B. S. Singh

ATTACHED

Nature and duration of leave taken	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer dismissal etc.)	12 Signature of the Head of the office of other Attesting Officer	13 LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		14 Signature of the head of the office or other Attesting officer	15 Reference to any recorded punishment, or censure or reward or praised of the Government servant
				Nature and duration of leave taken	Govt. to which debitable		
				Period			
	تاریخ انقطاع ملازمت	ذہبیات انقطاع ملازمت ترقی و تبادلہ یا برطرفی	دستخط افسر مجاز	وقت کی نوعیت و معیار	چار ماہ تک کی رعیت کیلئے اوسط دستخطیہ کا تعین	دستخط افسر مجاز	سزا یا جزا یا فہرست کارکردگی کا ریکارڈ
		Terminated from Service vide termination Notice No. 3023/E dated 15-6-97					
		Termination Notice No. 3023/E dated 15-6-97 is hereby withdrawn provisionally vide this office order no. 36 dt. 8/97					
		Transferred from Social Forestry (SFDP) Division Manshara to Galis Forest Division Abbottabad vide CCF, TFC NWFP O/O No. 23 dt. 5/98 and Forest Guard reported his departure on the forenoon of 16/98.					
		Divisional Forest Officer Galis Forest Division Abbottabad 31/98 Annual Increment					
		Divisional Forest Officer Galis Forest Division Abbottabad					

Service from 1-9-98 to 31-12-98
 received from salary 60.45


 Divisional Forest Officer Galis Forest Division Abbottabad

ATTACHED

Sd/- 10/10/05

8

8	9	10	11	12	13	14	15	
				LEAVE				
Signature and designation of the head of the office or other attesting officer in attestation (column 1 to 8)		Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to which debit to		
		30/97	Allowed Annual Increment					Service from 1/1/97 to 31/12/97 Verified from salary bill.
		30/98	Allowed Annual Increment					Service from 1/1/98 to 31/12/98 Verified from salary bill.
		30/99	Allowed Annual Increment					Service from 1/1/99 to 31/12/99 Verified from salary bill.
			Issued termination vide DFO SF letter no. 3415 dated 12-6-2000.					Termination Notice withdrawn vide DFO SF O/O No. 23 dated 8-2-2001.
			Transferred/adjusted in Lower Kachhan Forest Conservator of forests Siran Kachhan Forest Circle about 0/0 No. 49 dt 27-1-2001 reported departure on 1-2-2001 (An)					Service from 1/2000 to 21-8-2000 verified from salary bill.
			Allowed Annual Increment					

ATTENDED

(For use in and other similar Departments)

RECORD OF POSTINGS

9

No. of District Order	District and Post	No. of District Order	Date	District and Post	No. of District Order	Date
				Granted Selection grade BPS-7 (Rs. 1480-81-2695) w.e.f 5-12-96 vide Dfo Social Forestry O.O. No. 139 dt. 14-5-97		
12 1/97	30/97			Allowed Annual increment		Service from 1/97 to 31-12-97 verified from Salary bill
12 1/98	30/98			Allowed Annual increment		Service from 1/98 to 31/98 verified from salary bill
12 1/99	30/99			Allowed Annual increment		Service from 1/99 to 31-12-99 verified from Salary bill
12 1/2000				Issued termination notice No. 3453 dated 12-8-2000 by Dfo Social Forestry		Termination Notice withdrawn vide Dfo SF O/O No. 23 dated 8-9-2001
12 1/2001				Transferred/adjusted in Upper Kohan FD Balakot vide Conservator of Forests Sivan Kohan Forest circle A. A. Order Office order No. 49 dated 27-1-2001 & reported department on 27-1-2001 (AN)		

ATTACHED

Solo Order

(For use in _____ and other similar Departments)

10

RECORD OF POSTINGS

No. of District Order	District and Post	No. of District Order	Date	District and Post	No. of District Order	Date
12 01/2009 effect P-14 Staff Step Step Step	11 30/2009	Allowed annual Increment.		Service from 01-01-2009 to 31-12-2009 Verified from Salary bills.		
		Divisional Forest Officer Patrol Special Forest Division Abbotabad		Divisional Forest Officer Patrol Special Forest Division Abbotabad		
	Transfer to Siran Forest Division, Mansehra, vide CF O/C No 104 dated 15-02-2010 & reported departure on 18-02-2010.			Service from 01-01-2010 to 31-01-2010 Verified from Salary bills.		
		Divisional Forest Officer Patrol Special Forest Division Abbotabad		Divisional Forest Officer Patrol Special Forest Division Abbotabad		
(A-1)	Divisional Forest Officer Siran Forest Division Mansehra 21/2010			Post. rep. gradual vide Govt. of Khyber Pachtunkhwa Finance Deptt. Notification No. 50 (B.H.)/2010 dt: 22-6-2010		
	ATTACHED			Divisional Forest Officer Siran Forest Division Mansehra Services fr 1-7-2010 to 31-12-2010 Verified from the salary bills.		
	30/2010			Pay revised in accordance with Govt. Khyber Pachtunkhwa Finance Deptt. letter No. FDC/PR/1-1/2011 dt: 14-7-2011		
6 30/2011 11 2011	Allowed Annual Increment			Services fr 1-1-2011 to 31-12-2011 Verified from the salary bills.		
	Divisional Forest Officer Mansehra			Divisional Forest Officer Mansehra		

Feb. 19/21

11

9	10	11	12	13		14	15
				LEAVE			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				<p>30-11-2007</p> <p>Allowed Annual Increment</p> <p>D. F. O. Kishan</p>	<p>Deptt: Notification No. FD(PRC) 1-1/2007 dated 20/7/2007</p> <p>1-1/2007 (Rs. 5395)</p>		
<p>Allowed Annual Increment</p> <p>D. F. O. Kishan</p>	<p>Deptt: Notification No. FD(PRC) 1-1/2008 dated 10-02-2008</p> <p>1-1/2008 (Rs. 6527)</p>	<p>Deptt: Notification No. FD(PRC) 1-1/2008 dated 10-02-2008</p> <p>1-1/2008 (Rs. 6527)</p>	<p>Divisional Forest Officer Rajhan Forest Division Ghazipur</p>			<p>Services from 1-1-2008 to 31-12-2008 verified from salary bills.</p> <p>Divisional Forest Officer Rajhan Forest Division Ghazipur</p>	
<p>Transferred from Rajhan Forest Division Ghazi Habibullah to Ghazipur Forest Division Manshura vide CF, Abbottabad O/o No. 67-dt. 19/4/2009 & reported Departure on 12/02/2009 afternoon.</p> <p>Services from 01-01-2009 to 31-12-2009 verified from salary bills.</p>							
<p>30/2009</p> <p>Allowed Annual Increment</p> <p>Divisional Forest Officer Birew Forest Division</p>						<p>Services from 1-3-2009 to 31-12-2009 verified from Salary bills.</p> <p>Divisional Forest Officer Birew Forest Division</p>	

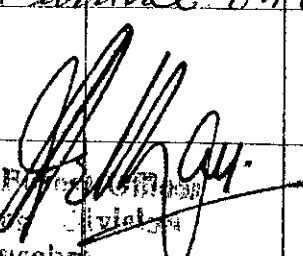
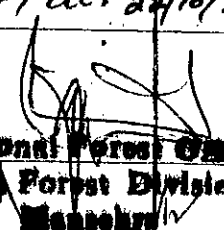
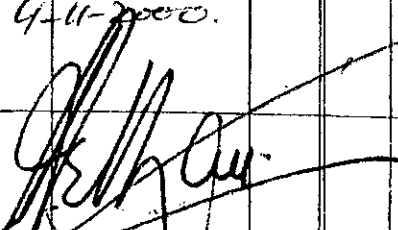
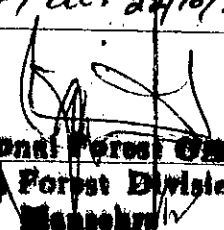
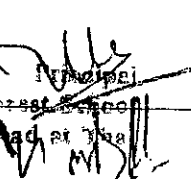
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9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	LEAVE		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
11 30/98	Allowed	Annual increment				Service from 1/98 to 31/98 Verified from Salary bill	12
11 30/99	Allowed	Annual increment				Service from 1/99 to 31/99 Verified from Salary bill	12
	Issued termination notice	wid DFO SF letter no 3487 dated 12-6-2000.			Termination notice withdrawn	wid DFO SF G.O.Ns. 2-3 dated 8-1-2001.	
	Transferred/adjusted in Lower Kasthan	wid conservator of Forest Shri Kasthan Circle, D/O No-49 dt 27-1-2001 reported departure on 2-2-2001 (AN)				Service from 1/2000 to 31-3-2000 Verified from salary bill.	12
Allowed annual increment							

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10	11	12	13	14	15	
Signature of head of office or other official	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the officer	Leave Allocation of period of leave on average pay upto four months for which leave salary is debit to Government Period Government to which debit	Signature of the head of the office or other arresting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
		Adjusted in Siran forest division vide CF/PO SUPPA-Meal of NO. 56 dt. 4.4.2000 and reported arrival on 6.4.2000 Permoon.		In view of an undertaking furnished by the P.S. on stamp paper to the effect that he will not claim any remuneration for the period during which he did not render any service in the Public Interest with Forest Dept., the intervening period from 12-11-1997 to 5/4/2000 treated as extra-ordinary leave without pay vide DPO Siran of No. 79 dt. 22/10/2007.	 Divisional Forest Officer Siran Forest Division Muzakhr	
		Deputed for training in Sarhad Forest School, Abbottabad vide this office NO. 1506-7/G dt. 3/2000 and reported departure on the afternoon of 4-11-2000.			 Divisional Forest Officer Siran Forest Division Muzakhr	
		Joined Sarhad Forest School Thar on the Afternoon of 06-11-2000	Principal Sarhad Forest School, Abbottabad at Thar	Relieved on the afternoon of 23/4/2001 after successful completion of 49th F.P.A. course 2000-2001	 Principal Sarhad Forest School, Abbottabad at Thar	

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8	9	10	11	12	13	14	15
					Leave		
					Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Government to which debitable		
	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
112 97	11 30/97	Allowed Annual increment					Service from 11/1/97 to 31/12/97 verified from salary bill.
2 98	11 30/98	Allowed Annual increment					Service from 1/1/98 to 31/12/98 verified from salary bill.
		Transferred to Siran Forest Division vide CF/PD SKFDP o/p No-205 dated 15-6-99 and reported departure on the after noon of 2-7-1999.					Service from 1/1/99 to 30/6/99 verified from salary bill.
9		Reported arrival in Siran Forest division Manshira on the P.M of 3-7-1999.					
	11 30/99	allowed Annual increment					Service from 1-7-1999 to 31-12-99 verified from salary bill.

Divisional Forest Officer
Social Forestry (S.F.D.P.)
Manshira

Divisional Forest Officer
Social Forestry (S.F.D.P.)
Manshira

Divisional Forest Officer
Social Forestry (S.F.D.P.)
Manshira

Divisional Forest Officer
Social Forestry (S.F.D.P.)
Manshira

Divisional Forest Officer
Social Forestry (S.F.D.P.)
Manshira

Divisional Forest Officer
Social Forestry (S.F.D.P.)
Manshira

Divisional Forest Officer
Siran Forest Division
Manshira

Divisional Forest Officer
Siran Forest Division
Manshira

Divisional Forest Officer
Siran Forest Division
Manshira

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9	10	11	12	13 LEAVE		14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
				Period	Government to which debitable			
				<p>As a result of enquiry conducted by DPO Lower Kachan on file of Singspurig of timber apprehended by the Staff of G. S. H. H. Range on 3-9-1997 and awarded the following punishment vide DPO Lower Kachan No. 63 dt 23-12-1997:-</p>				
				<p>i - Reverted to initial stage of his pay scale.</p>				
				<p>ii - Fine of Rs. 2500/- imposed which recovered in three equal instalment @ Rs. 1000/- from his pay (as compensation of Jeeptax).</p>				
				<p>30/11/97 Allowed annual increment. 31/12/97</p>				
				<p>Transferred to Sr. Div. Division Mansarovar vide 2198 dt 14/2/98 reported departure in the office on 10/3/98.</p>		<p>Semiconfirmed w.e.f. 01/12/1997 to 31/12/1997 from the salary bills.</p>		
				<p>10/3/1998</p>		<p>Semiconfirmed w.e.f. 01/10/1998 from the salary bills.</p>		
				<p>1998</p>				

9	10	11	12	13 LEAVE		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Government to which debitable		
	30/87	Poy fixed in Revised B.P.S. No 2 in accordance with Govt of N.W.F.P. F.D, Notification No, F.D(PRC) 1-1/87/WH dated 22-7-87 w.e.f. 1-7-87				<i>[Signature]</i> Divisional Forest Officer Siran Watershed Division Manshera	
	30/87	Allowed annual increment	<i>[Signature]</i>		Service verified	1.1.87	31.12.87
	30/11/88	Allowed annual increment	<i>[Signature]</i>			<i>[Signature]</i> Divisional Forest Officer Siran Watershed Division Manshera	Service from 1-1-1988 to 31-12-1988, verified from the salary bills
	30/88	Transferred from Siran W/S Divn to Upper Bagwan Forest Divn vide Cof NWFP No: 151 dt: 13-11-88 ad. upto deployment in the AM 25/12/88	<i>[Signature]</i> Divisional Forest Officer Siran Watershed Division Manshera			<i>[Signature]</i> Divisional Forest Officer Siran Watershed Division Manshera	
	30/88	Allowed annual increment	<i>[Signature]</i> Divisional Forest Officer Siran Watershed Division Manshera		Service verified from salary bills	1.1.88	To 31-12-87

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9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
Signature and designation of the head of the office or other attesting officer columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer dismissal etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debit to	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
	29/11/2005	Pay fixed in Revised pay scale vide Govt: of NWFP Finance Deptt: Notification No. FD(PRG) 1-1/2007 dated 20/7/07				Service from 1-1-2005 to 31-12-2005 verified from salary bills.	
D. F. O, Kaghan			Divisional Forest Officer Kaghan Forest Division Ghari Habibullah				
	30-11-2006					Service from 01-01-2006 to 31-12-2006 verified from salary bills.	
D. F. O, Kaghan		Pay fixed in Revised pay scale vide Govt: of NWFP Finance Deptt: Notification No. FD(PRG) 1-1/2008 dated 10-7-2008					
			Divisional Forest Officer Kaghan Forest Division Ghari Habibullah				
	30-11-2007					Service from 01-01-2007 to 31-12-2007 verified from salary bills.	
D. F. O, Kaghan			Divisional Forest Officer Kaghan Forest Division Ghari Habibullah				
						Services from 1-1-2008 to 31-12-2008 verified from salary bills.	
D. F. O, Kaghan		Transfer from Kaghan Forest Division to Gran Forest Division, Manshera vide C.P. lower category First Grade Attached ad offer vide no. 97 dated 28/01/2010 and reported departure on 15/2/2010.					
			Divisional Forest Officer Kaghan Forest Division Ghari Habibullah				
						Services from 01-01-2010 to 31-01-2010 verified from salary bills.	
Divisional Forest Officer Gran Forest Division Manshera			Divisional Forest Officer Kaghan Forest Division Ghari Habibullah				
		Post up gradual vide Govt: of NWFP Finance Deptt: Notification No. 50(6th)/Fm/1-4/2K dated 22/6/2010					
			Divisional Forest Officer Kaghan Forest Division Ghari Habibullah				

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Divisional Forest Officer Gran Forest Division

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GOVERNMENT OF WEST PAKISTAN
FOREST DEPARTMENT

WHEREAS the President of Pakistan has issued a Proclamation of the President of Pakistan in exercise of all powers enabling him in that behalf, the Government of West Pakistan is pleased to make the following rules regulating recruitment to the Forest Department Forest Guards (Divisional) Service and to prescribe conditions of service for the persons appointed thereto.

THE FOREST DEPARTMENT FOREST GUARDS (DIVISIONAL) SERVICE RULES, 1962

PART I - GENERAL

- 1. These rules shall commence on the date of their publication in the Gazette of West Pakistan and shall be deemed to have come into force from that date.
- 2. Definitions. In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them:—
 (a) "Commission" means the West Pakistan Public Service Commission;
 (b) "Divisional Forest Officer" means an officer of a Forest Department Government; and
 (c) "Recruitment" means the process of transfer, promotion, or appointment to the service in accordance with the provisions of these rules.
 (d) "Under-developed areas" means the areas in which the Government has decided to develop the economy and to provide employment opportunities for the people of such areas for the purposes of the Government of West Pakistan.

PART II - RECRUITMENT

- 3. Constitution and composition of the Service (I) The Service shall be a separate service and shall be subject to the provisions of these rules. (II) The Service shall comprise all the posts of Forest Guards in the Forest Department.
- 4. Appointing Authority—Appointments to the Service shall be made by the Commission.
- 5. Method of recruitment—A. Recruitment to the Service shall be by competitive examination. B. No person, who is less than 18 years of age, shall be appointed to the Service.
 (i) For a period of ten years from the coming into force of these rules, the Commission may, in the case of persons who are already in the service, make appointments to the service, provided that such appointments are made within the limit under this rule, he shall be appointed to the service, provided that such appointments are made within the limit under this rule.

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...with his ...
...the period of ...
...on the ...
...passed during or ...

...by a period not exceeding two ...
...of such period, pass such orders ...
...copy of the initial probational ...

3

...I-if no orders have ...
...of the initial probationary ...
...to be extended.

...made by the day following the ...
...period, the probation shall be ...

ir

...II-if no orders have ...
...period of probation expires, the ...
...in his appointment ...
...or may be deemed to have ...

...one day by the day on which the ...
...probationer shall be deemed to ...
...on the date his probation was ...
...or extended.

10

...shall be confirmed ...
...such training and passed ...
...by Government from time ...

...the service unless he success- ...
...such departmental examinations as ...
...to time.

he

...if a member of the service ...
...post any departmental examina- ...
...period or in such number of ...
...the Divisional Forest Officer ...

...to complete successfully any ...
...prescribed under sub-rule (4), ...
...attempts as may be prescribed by ...
...may dispense with his services.

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...seniority. The seniority inter ...
...be deemed in accordance with ...
...if two or more persons are ...
...or their inter or seniority ...
...of merit assigned by the ...

...of the members of the service ...
...orders of their appointment, ...
...appointed on the same date or by ...
...all be determined in accordance ...
...Divisional Forest Officer.

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...to transfer members ...
...transfer ...
...in any form ...
...set up or establi ...

...the service shall be liable ...
...district, and ...
...of any local authority ...
...by Government.

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...in all matters ...
...of the service shall be gov- ...
...prescribed by Govern ...

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...and made applicable to them.

...any of these rules ...
...in individual cases if ...
...of the rule would caus ...

...for reasons to be recorded ...
...Government is satisfied that a ...
...undue hardship to the individual ...
...to all or any of its powers under ...

...Government may dele- ...
...any officers subordinate to ...

...of Governor to safeguard ...
...of these rules, the ...
...in connection with ...
...by any law ...
...the Government ...
...to safeguard the ...

...rights of Government Servant when ...
...terms and conditions of service ...
...of the Province of ...
...the time being in force, and ...
...of West Pakistan, shall not ...
...national and local rights of such ...

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...of the Governor of West Paki- ...
...of West Paki- ...

TENTATIVE SENIORITY LIST OF FORESTERS IN RESPECT OF SIRAN FOREST DIVISION MANSEHRA AS IT STOOD ON 31.12.2019

22

#	Name Of Forester	Qualification	Home District	Any Test Passed	Date of Birth	Date of Appointment in		Cadre	Remarks
						Govt Service	Present grade		
1	2	3	4	5	6	7	8	9	10
1.	Naseem Khan Forester	F.Sc	Mansehra	Forester Course passed	6.06.1987	12.12.2007	12.12.2007	Forester	-
2.	Muhammad Naseem Forester	F.A	Mansehra	37 th Forester Course passed	5.02.1964	31.08.1982	06.03.2015	Forester	-
3.	Ahmad Nawaz Forester	Matric	Mansehra	39 th Forester Course Passed	01.01.1968	04.05.1986	10.04.2015	Forester	-
4.	Muhammad Shabir Forester	Matric	Mansehra	Un-trained	01.02.1965	05.01.1987	10.04.2015	Forester	-
5.	Muhammad Riaz Forester	Matric	Mansehra	Un-trained	20.03.1964	18.10.1982	30.06.2015	Forester	-
6.	Muhammad Alam Forester	Matric	Mansehra	Un-trained	03.07.1968	17.08.1987	04.12.2017	Forester	-
7.	Muhammad Nazir Forester	Matric	Mansehra	Un-trained	01.05.1967	10.10.1987	04.12.2017	Forester	-
8.	Muhammad Bashir Forester	Middle	Mansehra	Un-trained	15.02.1961	21.02.1981	27.03.2018	Forester	-
9.	Muhammad Pervaiz Forester	Matric	Mansehra	Un-trained	23.08.1962	15.06.1981	14.09.2018	Forester	-
10.	Ali Ahmad Forester	Matric	Mansehra	Un-trained	13.10.1965	15.08.1985	14.09.2018	Forester	-
11.	Muhammad Siddique Forester	Matric	Abbottabad	Un-trained	01.04.1965	02.12.1985	06.03.2019	Forester	-

Divisional Forest Officer
Siran Forest Division Mansehra

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 GOVERNMENT OF KHYBER PAKHTUNKHWA FORESTRY, ENVIROMNENT AND WILDLIFE DEPARTMENT (SIRAN FOREST DIVISION MANSEHRA)
 Final seniority list of Forest Guards BPS-08 in Siran Forest Division Mansehra as it stood on 31.12.2019

S.#	Name of Forest Guard	BPS	Birth	Domicile	Qualification	Date of:-			Name or No. of Course attended		Parent Division	Remarks
						Ist: entry into Govt. service	Appointment/ Adjustment	Selection grade	Regular Course	Up-gradation Course		
1.	Mr. Ishtiaq Ahmad	8	4-4-1970	Mansehra	Matric	27-04-1988	27.07.1988	-	25th	-do-	A.T Division	-
2.	Mr. Muhammad Altaf	8	1-3-1967	Mansehra	Matric	09-12-1989	09.12.1989	-	30th	-do-	Siran Division	-
3.	Mr. Zafeer Ahmad	8	1-10-1971	Mansehra	BA	12-12-1989	12.12.1989	-	28th	-do-	Siran division	-
4.	Mr. Muhammad Taseem	8	1-2-1968	Mansehra	Matric	22-01-1990	28.02.1990	-	34th	-do-	Soka Nullah Project (Defunct)	-
5.	Mr. Tahir Ayub	8	1-6-1970	Mansehra	F.A	15-07-1990	15.07.1990	-	49th	Not attended	A.T Division	-
6.	Mr. Muhammad Haroon-II	8	20-4-1970	Abbottabad	Matric	18-09-1991	09.09.1996	-	32nd	-do-	Hazara Social Forestry Project(Defunct)	Adjusted in SFD vide o.o No. 210 dt: 27.12.1997
7.	Mr. Sajjad Ahmad	8	20-3-1970	Mansehra	Matric	22-01-1990	19.11.1996	-	Trained	Attended 6th	Soka Nullah Project (Defunct)	-
8.	Mr. Rustum Khan	8	15-1-1968	Mansehra	Matric	09-05-1987	01.07.1997	-	30th	-do-	Intensive Forest Management Project	-
9.	S. Ejaz Hussain Shah	8	1-3-1972	Mansehra	Matric	01-09-1992	13.01.1999	-	34th	Attended 9th	Afforestation Siran Forest Development Project	-
10.	Niaz Ahmed Shah	8	12.2.1965	Abbottabad	Matric	16.04.1985	23.03.1999	-	25th	Not attended	Soka Nullah Project (Defunct)	Adjusted in Hazara Tribal Forest Division on 22.03.1999
11.	Mr. Muhammad Mushtaq	8	11-5-1966	Mansehra	Matric	22-01-1990	01.06.2001	-	31st	-do-	Soka Nullah Project (Defunct)	Regularized in SFD from the date of arrival vide o/o No.43 dt: 4.8.2003
12.	Mr. Muhammad Ilyas	8	4-4-1971	Abbottabad	FA	14-03-1993	07-10-2005	-	59th	Not attended	Siran Forest Division	-
13.	Mr. Muhammad Javed	8	15-5-1977	Mansehra	Matric	01-07-2004	19.03.2007	-	Un-trained	-do-	Siran Forest Division	-

38.	Hammad Arshad	8	28-8-1992	Mansehra	F. Sc	17-3-2015	17-3-2015	-	-	-	Siran Forest Division	-
39.	Assad-Ur-Rehman	8	01-3-1993	Mansehra	D.Com	17-3-2015	17-3-2015	-	-	-	Siran Forest Division	-
40.	Mati-Ul-Islam Khan	8	15-1-1994	Mansehra	FA	17-3-2015	17-3-2015	-	Under training	-	Siran Forest Division	-
41.	Rana Abdul Hameed	8	28-7-1996	Mansehra	F. Sc	18-3-2015	18-3-2015	-	-	-	Siran Forest Division	-
42.	Muhammad Usman	8	26.10.1990	Mansehra	D.Com	10.4.2015	10.4.2015	-	-	-	Siran Forest Division	-
43.	Tahir Fida	8	03.02.1991	Mansehra	F.A	10.4.2015	10.4.2015	-	Under training	-	Siran Forest Division	-
44.	Rashid Sadiq	8	15.05.1994	Mansehra	D.Com	10.4.2015	10.4.2015	-	79th	-	Siran Forest Division	-
45.	Khyzer Hayat	8	12.6.1995	Mansehra	F.Sc	10.4.2015	10.4.2015	-	Un-trained	-	Siran Forest Division	-
46.	Naeem Ahmed	8	12.11.1986	Mansehra	F.A	01.7.2015	01.7.2015	-	-	-	Siran Forest Division	-
47.	Sohaib Ali	8	06.02.1994	Mansehra	Bs Honor	19.10.2016	19.10.2016	-	-	-	Siran Forest Division	-
48.	Rehmat Ali	8	03.08.1989	Mansehra	B.Com	20.10.2016	20.10.2016	-	82 nd trained	-	Siran Forest Division	-
49.	Siraj Ahmed	8	12.02.1990	Mansehra	M.Com	20.10.2016	20.10.2016	-	Un-trained	-	Siran Forest Division	-
50.	Rana Muhammad Asad	8	23.11.1992	Mansehra	F.Sc	20.10.2016	20.10.2016	-	-	-	Siran Forest Division	-
51.	Waqas Hassan	8	02.02.1989	Mansehra	BSC	24.10.2016	24.10.2016	-	-	-	Siran Forest Division	-
52.	Majid Hussain Shah	8	09.05.1992	Mansehra	B.A	25.10.2016	25.10.2016	-	-	-	Siran Forest Division	-
53.	Waqas Ahmed Khan	8	01.01.1989	Mansehra	F.A	06.01.2017	06.01.2017	-	-	-	Siran Forest Division	-
54.	Syed Shujahat Ali Shah	8	01.03.1990	Mansehra	B.A	16.03.2017	16.03.2017	-	-	-	Siran Forest Division	-
55.	Waseem Anwar	8	09.02.1990	Mansehra	B.A	19.12.2017	19.12.2017	-	-	-	Siran Forest Division	-
56.	Mohammad Shoaib	8	11.3.1992	Mansehra	F.Sc	19.12.2017	19.12.2017	-	-	-	Siran Forest Division	-
57.	Usama Mumtaz	8	15.2.1995	Mansehra	D.Com	25.01.2018	25.01.2018	-	-	-	Siran Forest Division	-
58.	Waqar Bakht	8	09.04.1993	Mansehra	F.A	08.01.2018	08.01.2018	-	-	-	Kaghan Forest Division	-
59.	Amir Khan	8	25.6.1982	Mansehra	B.A	12.11.2018	12.11.2018	-	-	-	Siran Forest Division	-
60.	Saad Ali	8	21.8.1995	Mansehra	F.Sc	12.11.2018	12.11.2018	-	-	-	Siran Forest Division	-
61.	Uzair Sajjad	8	03.06.1998	Mansehra	F.Sc	12.11.2018	12.11.2018	-	-	-	Siran Forest Division	-

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62.	Muhammad Saqib	8	14.01.1995	Mansehra	F.Sc	11.01.2019	11.01.2019	-	-	-	Siran Forest Division	-
63.	Muhammad Sajjad	8	14.04.1998	Mansehra	F.Sc	11.01.2019	11.01.2019	-	-	-	Siran Forest Division	-
64.	Yasir Nawaz	8	14.08.1999	Mansehra	F.Sc	26.11.2019	26.11.2019	-	-	-	Siran Forest Division	-

Divisional Forest Officer
Siran Forest Division Mansehra

26

بخدمت جناب کنزرویٹور فارسٹ صاحب لوئر ہزارہ فارسٹ سرکل اینٹ

عنوان!

اپیل برائے سینارٹی و ترقی / انصاف دلانے

7000

21-1-2000

بوساطت جناب ایس ڈی ایف اوصاحب لوئر سرن فارسٹ سب ڈویژن شکیاری

جناب عالی!

مودبانہ گزارش ہیکہ فدوی بسلسلہ عنوان بالا جناب کی خدمت میں چند معروضات پیش کرنا چاہتا ہے۔

1۔ یہ کے فارسٹ گارڈ سروسز رولز 1962 کے مطابق فارسٹ گارڈ کی آسامی پر متعلقہ ڈویژن کی حدود میں رہائش پزیر افراد امر میں سے فارسٹ گارڈ بھرتی کئے جائیں گے اور اس قانون کے مطابق فارسٹ گارڈ کو ڈویژنل کیڈر قرار دیا گیا ہے۔ اور اسی ڈویژن سینارٹی کی بنیاد پر فارسٹ کے عہدے پر ترقی بھی پائے گا۔

2۔ یہ کے اسی قانون کے مطابق تمام ڈویژنز خواہ واٹرشید یا ٹریٹوریل فارسٹ ڈویژن فارسٹ گارڈ کو ڈویژنل کیڈر کی بنیاد پر ہی دے کر ترقی دی جاتی ہے۔ اور دوسرے کسی بھی ڈویژن سے آنے والے کسی بھی فارسٹ گارڈ کو ترقی نہیں دی جاسکتی۔ بلکہ ایسے ترقی کو سینارٹی لسٹ کے باٹم پر رکھا جاتا ہے۔

3۔ یہ کے برخلاف اس کے سرن ڈویژن میں باہر سے ایڈجسٹ ہونے والے یا تبدیل ہو کر آنے والے تمام ملازمین / فارسٹ گارڈ فارسٹ کے عہدے پر ترقیاں دی گئی ہیں۔ جو کے رولز مندرجہ بالا کی صریحاً خلاف ورزی ہونے کے ساتھ ساتھ سرن ڈویژن میں ہونے والے اور پہلے ایڈجسٹ ہونے والے ملازمین کے ساتھ ناجائز حق تلفی اور سراسر نا انصافی ہوئی ہے۔ اسی طرح تمام ملازمین گارڈ سرن ڈویژن کو ان کے بنیادی حق سے محروم کیا گیا ہے۔ جب بھی کوئی آسامی آتی ہے تو دوسرے ڈویژن کے فارسٹ گارڈ ہیں۔ اور میں سرن ڈویژن میں 1993 ایڈجسٹ ہونے کے باوجود ترقی سے محروم ہوں۔ اور مجھ سے دوسرے ڈویژن سے بعد والے فارسٹ کی پوسٹ پر ترقی پالیتے ہیں۔ جو کہ میرے ساتھ سراسر نا انصافی اور حق تلفی ہے۔ اور میں 30 سال سروس کے باوجود اب میں 27 سال کی سروس کے باوجود تاحال اس نا انصافی کی وجہ سے فارسٹ کے عہدے پر ترقی سے محروم ہوں۔

4۔ اس ضمن میں مزید عرض ہے کہ آپ جناب کے زیر سایہ لوئر ہزارہ سرکل کے دوسرے ڈویژن ہری پور فارسٹ ڈویژن گلپنہ فار ڈویژن کاخان فارسٹ ڈویژن اور اپر ہزارہ فارسٹ سرکل میں کے کوہستان فارسٹ ڈویژن اور اپر ہزارہ ٹرائبل فارسٹ ڈویژن سوائے سرن فارسٹ ڈویژن کسی بھی فارسٹ ڈویژن میں اس طرح نہ تو سینارٹی دی جاتی ہے۔ اور نہ ہی باہر سے آنے والے کو

فارسٹ گارڈ کو چاہے اس کی سروس کتنی ہی زیادہ ہو اس نئے ڈویژن میں وہ سینارٹی لسٹ میں باٹم پہ ہی رہے گا۔

سینارٹی / فارسٹ کے حق کے لئے اس میں اصرار ہے جس کی

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یہ حکم صادر فرمایا ہیکہ کسی بھی سرکل یا ڈویژن سے فارسٹر یا فارسٹ گارڈ کو دوسرے ڈویژن یا سرکل میں ٹرانسفر نہ کیا جائے اس سے ان ڈویژنز میں پہلے سے موجود فارسٹ گارڈز اور فارسٹر کی سینارٹی متاثر ہوتی ہے۔ اور Dispute پیدا ہونے میں اور نا انصافی ہوتی ہے۔

6۔ جناب سے گزارش ہیکہ اس سلسلے میں دوسرے اپنے زیر سایہ فارسٹ ڈویژن کے ڈی ایف اوز پر مشتمل فیکٹ فائینڈنگ کمیٹی بنا کر اس کی رپورٹ کی روشنی میں فدوی کو جب سے فدوی سرن ڈویژن میں سینارٹی لسٹ پر ٹاپ پر تھا پروموٹ کرنے کے احکامات صادر فرمائے جائیں۔ تاکہ انصاف کے تقاضے پورے ہوں۔

لہذا آپ جناب کی خدمت میں معروض ہوں کہ فدوی کی ایپل پر ہمدردانہ غور فرماتے ہوئے اور انصاف کے تقاضے پورے کرتے ہوئے دوسرے فارسٹ ڈویژن سے آنے والے جو کے مجھ سے بعد میں سرن ڈویژن سے سرن ڈویژن میں ایڈجسٹ یا تبدیل ہو کر آنے ہیں اور فارسٹر کے عہدے پر پروموٹ ہوئے ہیں کو مجھ سے سینارٹی میں جو نیئر کرتے ہوئے مجھے پروموٹ کر کے مجھے انصاف فراہم لیا جائے۔ اور میری حق تلفی کا ازالہ فرمایا جائے۔

فدوی آپ کے انصاف دلانے اور حق تلفی کا ازالہ کرنے پر تاعمر دعا گو رہے گا۔

عین نوازش ہوگی

العارض

فدوی طاہر ایوب فارسٹ گارڈ لوئر سرن فارسٹ سب ڈویژن شنکیاری
 طاہر ایوب
 F.S.D.

ایڈوانس کاپی برائے کنزرویٹو لور ہزارہ فارسٹ سرکل ایبٹ آباد

Forwarded to C.F. Lower Hazara Forest circle

The application of the applicant is forwarded to your good self through proper channel for information and further course of actions please

cc. [Signature]

Sub Divisional Forest Officer
 Lower Sindh Forest Sub Division
 Shinkari

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MR. MUHAMMAD ARIF
DIVISIONAL FOREST
OFFICER
SIRAN FOREST DIVISION
MANSEHRA
Ph. & Fax #. 0997-920140



NO: 5188 /GE
Dated: 06 /11/2020

Mr. Tahir Ayub Forest Guard
c/o SDFO Lower Siran

Subject: APPEAL REGARDING PROMOTION OF FOREST
GUARD IN RESPECT OF SIRAN FOREST DIVISION

Memo: Reference your application dated 02.11.2020.

Your application is not entertainable at this belated stage keeping in view
the provision contained in Rule 3(i) of Khyber Pakhtunkhwa Civil Servant
(Appeal) Rules 1986 being barred form time.

Divisional Forest Officer
Siran Forest Division Mansehra
[Signature]

Received by
Mr. Ayub / S.J.
28/12/2020

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[Signature]

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S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	08.12.2015	<p style="text-align: center;">3</p> <p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">APPEAL NO.1451/2013</p> <p>(Muhammad Sabir-vs-Govt: of Khyber Pakhtunkhwa through Secretary Environment Department, Peshawar and others).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>ABDUL LATIF, MEMBER:</u></p> <p>Counsel for the appellant (Mr. Shahzada Irfan Zia, Advocates) and Mr. Nisar Ahmed, Sub Divisional Forest Officer alongwith Mr. Ziaullah, GP for official respondents No. 1 to 4 and counsel for private respondents (Mr. Noor Muhammad Khattak, Advocate) present.</p> <p>2. The instant appeal has been filed by the appellant under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act-1974 against the impugned seniority list dated 20.10.2011 whereby the name of the appellant has been shown at S.No. 104 below the name of respondents No.5 to 105, who are far juniors to the appellant, and his departmental appeal against the impugned seniority list was rejected by respondent No.4 vide order dated 05.08.2013 communicated to the appellant on 14.10.2013. He prayed that on acceptance of this appeal the impugned final order of respondent No.4 dated 05.08.2013, and</p>

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the impugned seniority list No. 1053-56 dated 20.10.2011 stood on 30.09.2011 may graciously be set aside, being illegal, void, against the rules, directing the respondents No.1 to 4 to place the name of the appellant at appropriate place, showing the names of respondents No.5 to 105 below the name of the appellant by issuing a revised seniority list in accordance with the rules.

3. Brief facts giving rise to the instant appeal are that the appellant is a regular member of Provincial Civil Service, serving as Forest Guard in Forest Department under the administrative control of respondent No.4. That the appellant joined Forest Department on 12.3.1977. That on 1.3.2010 the appellant was transferred from Siran Forest Division Mansehra to Kaghan Forest Division, Garhi Habibullah in the interest of public service. Respondent No. 4 on 20.10.2011 issued/circulated the seniority list of Forest Guards of Kaghan Forest Division, but it was astonishing that name of the appellant in the said impugned seniority list was shown at serial No. 104, despite of the fact that the Forest Guards whose names have been shown at serial No. 1 to 102, they all are far juniors to the appellant, but their names have been shown above the name of the appellant due to certain underground reasons, without any justification against the principle and rules of seniority. That it is pertinent to mention that the date of initial appointment of the appellant and private respondents would reveal that the appellant is senior than his rival colleagues as per seniority dated 20.10.2011, but the appellant

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has been relegated to lower position at serial No. 104 while the name of his junior colleagues/respondents have been shown at serial No. 1 to 102. That against the impugned seniority list dated 20.10.2011 the appellant preferred departmental appeal which was rejected by the respondents No. 4 vide order dated 5.8.2013 communicated to the appellant on 14.10.2013. That the seniority of the appellant has been changed without the process of law, without serving any show cause notice, hearing to the appellant, hence the change in seniority position of the appellant is against the law/rules and natural justice, hence the present appeal.

4. The learned counsel for the appellant argued that the appellant was appointed as Forest Guard on 12.03.1977 in the Siran Forest Division and was transferred to the Kaghan Forest Division on 01.03.2010. He further argued that seniority list of Forest Guard issued by respondent No.4 on 20.10.2011 where name of the appellant was placed at S.No. 104 inspite of the fact that private respondents at serial No 1 to 102 of the seniority list were much junior to the appellant. He argued that transfer of the appellant to the Kaghan Forest Division was made in the public interests and appellant never gave any option/willingness for the said transfer, hence the placement of the appellant at the bottom of Forest Guards of the Kaghan Forest Division was illegal, without any lawful authority and not maintainable under the law. He further argued that seniority of the appellant was changed without any show cause notice and without process of law hence the same was against

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the law and natural justice. He prayed that on acceptance of this appeal, the impugned order dated 5.8.2013 may be set aside and the appellant may be restored at the relevant position in seniority list of the Forest Guards on the basis of his date of regular appointment as prescribed in the Appointment, Promotion and Transfer Rules of the Government of Khyber Pakhtunkhwa. He relied on 2014 SCMR 1289.

5. The learned counsel for private respondents argued that the appellant was appointed in a Project "Kunhar Valley Watershed Project Abbottabad" of the Forest Department funded by the Federal Government till 2010 and on winding up of the said Project the appellant was adjusted in the Kaghan Forest Division after obtaining of his willingness by the concerned conservator of Forests. He further argued that seniority of Forest Guards was maintained at Divisional level under the Forest Department Divisional Service Rules 1962 and on transfer from Siran Division to Kaghan Forest Division, seniority of the appellant was correctly fixed below the private respondents being permanent employees of the said Division. He also relied on Rule-8 of the APT Rules 1989 according to which seniority on Provincial transfer was fixed at the bottom and the same principle was also applicable to the case of the appellant. He also referred to Establishment Division Government of Pakistan OM. dated 31.1.2014 followed by Khyber Pakhtunkhwa Establishment Department Circular dated 25.02.2014 which clearly disallowed back-dated seniority to non-civil servants in terms of the judgment of

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Supreme Court of Pakistan dated 12.6.2013. The learned Government Pleader also adopted the arguments advanced by the counsel for private respondents and prayed that the appeal being devoid of any merits may be dismissed. He relied on 2013 SCMR 911, 2002 SCMR 875, 2006 SCMR 453, 2009 SCMR 1435, 2002 SCMR 875, 2002 SCMR 889, 2006 SCMR 453 and 2011 SCMR 676.

6. Arguments of learned counsels for the parties heard and record perused with their assistance.

7. From perusal of the record, it transpired that the appellant was initially appointed in a project in the Siran Forest Division which was funded by the Federal Government and on winding of the said scheme he was adjusted/absorbed in the Kaghan Forest Division on 31.3.2010. Besides being an employee of a project the appellant through-out remained an employee of the Siran Forest Division and his services were regulated for all practical purposes under the Forest Department, Forest Guard (Divisional Service Rules, 1962 where seniority was maintained at divisional level being borne on divisional cadre. Record also revealed that prior to his adjustment in Kaghan Forest Division, willingness of the appellant was also obtained by the relevant authorities to save him and other employees of the said scheme from rendering surplus. His seniority in the Kaghan Forest Division was thus correctly fixed at the bottom of the seniority list of the private respondents who had already got vested rights over the

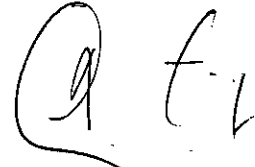
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particular seniority position by virtue of their being permanent members of the cadre . There was therefore no legal force in the claim of the appellant for back-dated seniority in the Kaghan Forest Division and the appeal being devoid of any merits is dismissed. Parties are left to bear their own costs. File be consigned to the record.



(PIR BAKHSH SHAH)
MEMBER



(ABDUL LATIF)
MEMBER

ANNOUNCED
08.12.2015

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H (36)

COPY OF LETTER NO.7813-15/E DATED 1.4.2014 FROM CCF, NORTHERN FOREST REGION-II ABBOTTABAD TO THIS OFFICE AND OTHERS.

Subject: CRL, ORIGINAL PETITION NO.89/11, CMA 309-K/12, CMA.310-K/2012, CRL.MAS42-K/2012, 80-K/2012, 87-K/2012, 3-K/2013, CMA 2453/13, CRL, M.A 29-K/2013, CMA.131-K/2013/CRL.M.AS 185-K/2012, 225-2013, 226/2013, 227/2013, CMAS, 224-K/2013, 257-K & 258-K/2013, CRL.M.A 263/2013, CRL, MA.282 IN CRL ORIGINAL PETITION NO.89/2011 (2013/SCMR/1752).

Memo:
Enclosed please find herewith a copy of Section Officer (Litigation) Government of Khyber Pakhtunkhwa Environment Department Peshawar letter no.SO(Lit)/E-D/II-62/92(Instruction)/1810-19 dated 11.3.2014, which is self contained for information, necessary action and strict compliance.
Encl: As above

Sd/-CHIEF CONSERVATOR OF FORESTS
NORTHERN FOREST REGION-II
KHYBER PAKHTUNKHWA
ABBOTTABAD

No. 6703-07 B&A dated Abbottabad, the 3 /April, 2014

Copy alongwith its enclosures forwarded to all Divisional Forest Officers in Lower Hazara Forest Circle Abbottabad for information, necessary action and strict compliance.
Encl: As above

CONSERVATOR OF FORESTS,
LOWER HAZARA FOREST CIRCLE,
ABBOTTABAD

Make a photo for the undersigned

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BC=465

GOVERNMENT OF PAKISTAN
CABINET SECRETARIAT
ESTABLISHMENT DIVISION

Islamabad, 31 January, 2014
Addl Secy: (Just Secy)
Library No. 376-24
Outlet 3-22-2014

OFFICE MEMORANDUM

CRL ORIGINAL PETITION NO. 89/2011, CMA.309-K/2012, CMA.310-K/2012, CrI.M.As.42-K/2012, 80-K/2012, 87-K/2012, 13-K/2013, CMA.2453/13, CrI.M.A.29-K/2013, CMA.131-K/2013, CrI.M.As.185-K/2012, 225/2013, 226/2013, 227/2013, CMA.244-K TO 247-K/2013, 257-K & 258-K/2013, CrI.M.A. 263/2013, CrI.M.A. 282 IN CRL ORIGINAL PETITION NO.89/2011(2013/SCMR/1752)

The undersigned is directed to say that the Honorable Supreme Court of Pakistan had passed judgment on 12-6-2013 on the subject petitions clubbed with a number of other petitions and had ordered that a copy of this judgment be sent to all the Chief Secretaries of the provinces as well as the Establishment Secretary with the direction to streamline the service conditions of civil servants in line with principles laid down in this judgment.

It was expected that afore-mentioned judgment was downloaded by all Ministries/Departments for compliance. However, for the sake of convenience, the following guidelines/principles are highlighted:-

The Honourable Court has declared the following practices as illegal:-

(1) A civil servant, who after passing the competitive exam in terms of the recruitment rules, is appointed on merits, loses his right to be considered for promotion, when an employee from any other organization is absorbed without competing or undertaking competitive process with the backdated seniority and is conferred the status of a civil servant in complete disregard of recruitment rules.

Absorption of a non Civil Servant conferring on him status of a Civil Servant and likewise absorption of a Civil Servant from non cadre post to cadre post without undertaking the competitive process under the recruitment rules.

Introduction of any validation law in the nature of multiple or parallel legislation in the subject of service law.

...with or without backdated seniority.

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- (v) The re-employment / rehiring of the retired Civil / Government Servants being violative of the constitution are declared nullity.

The Apex Court has further held that: -

- (a) No non-civil servant can be transferred and appointed by way of deputation to any cadre. The procedure provided under Esta Code has been approved by this Court in the case of Mohammad Arshad Sultan.
- (b) No civil servant of a non-cadre post can be transferred out of cadre to be absorbed to a cadre post which is meant for recruitment through competitive process.
- (c) The procedure provided under ESTACODE requires that a person who is transferred and appointed on deputation must be a govt servant and such transfer should be made through the process of selection. The borrowing Govt has to establish the exigency in the first place and then the person who is being transferred/ placed on deputation in Govt must have matching qualifications and expertise in the field with required experience.
- (d) An employee holding a post under any authority or corporation, body or organization established by or under any Provincial or Federal law or which is owned or controlled by Federal or Provincial Government or in which Federal Government or Provincial Government has controlling share or interest, could not be conferred status of a civil servant.
- (e) It is settled principle of law that if the right of promotion is not blocked by re-employment then such powers can be exercised, then too in exceptional cases for a definite period. Besides it violates the fundamental rights of the serving civil servants, on account of such rehiring on contract are deprived of their legitimate expectancy of promotion to a higher cadre, which is violative of the provisions of Articles 4, 9 and 25 of the Constitution.
- (f) The absorption and out of turn promotion will also impinge on the self respect and dignity of the civil servants, who will be forced to work under their rapidly and unduly promoted fellow officers, those who have been inducted from the services / cadres regardless of their (inductees) merit and results in the competitive exams (if they have appeared for exam at all), hence are violative of Article 14 of the Constitution.
- (g) Principle of locus poenitentiae is the power of receding till a decisive step is taken but it is not a principle of law that order once passed becomes irrevocable in part and closed transaction. If the order is illegal then perpetual rights cannot be based on the basis of an illegal order.

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(h) Any backdated seniority cannot be granted to any absorbée and his inter-
seniority, on absorption in the cadre shall be maintained at the bottom as provided
under the Rules regulating the seniority.

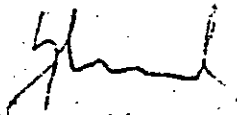
3. All Ministries / Divisions and Departments / Organizations under them are
requested to comply with the judgment of the Apex Court in letter and spirit.

(Muhammad Shakeel Malik)
Joint Secretary

All Ministries / Divisions/Departments

Copy forwarded for information to: -

1. Chief Secretary, Government of the Punjab, Lahore
2. Chief Secretary, Government of Sindh, Karachi
3. Chief Secretary, Government of KPK, Peshawar
4. Chief Secretary, Government of Balochistan, Quetta
5. Chief Secretary, Gilgit Baltistan, Gilgit.
6. Chief Secretary, Government of AJ&K, Muzaffarabad


(Naseer Ahmed)
Deputy Secretary

Go with
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NO.50(Estt)/FE&W/D/1-111/2019
Dated Peshawar the, 02nd August, 2019

- To
- 1) The Chief Conservator of Forests,
Central Southern Forest Region-I,
Khyber Pakhtunkhwa,
Peshawar.
 - 2) The Chief Conservator of Forests,
Northern Forest Region-II,
Civil Line Forest Offices,
Abbottabad.
 - 3) The Chief Conservator of Forests,
Malakand Forest Region-III,
Saidu Sharif, Swat.

**Subject: - POSTING/TRANSFER OF FORESTERS/FOREST GUARDS/OTHERS
ACROSS REGIONS/CIRCLES/DIVISIONS**

I am directed to refer to the subject captioned above and to say that the post of Forest Guard is divisional cadre and as per the service rules, the post of Forest Guard is to be filled in among the bonafide residents/domicile holders of the areas/districts falling within the jurisdiction of the Forest Division in which the post falls vacant.

2) It has been observed that Forest Department issues posting/transfer orders of Foresters and Forest Guards etc from one Forest Circle/Forest Division to another Forest Circle/Forest Division. As a result, this department receives certain appeals from Foresters and Forest Guards through your respective offices and lower offices as well directly from the applicants regarding seniority disputes arising due to their transfers from one Forest Circle/Forest Division to another Forest Circle/Forest Division as they claim seniority from the date of their initial appointment. This practice is against the rules. This avoidable practice gives rise to litigation due to which organizational work suffers.

3) In view of above, it is advised that henceforth no Forester and Forest Guard etc shall be transferred from their initially appointed Forest Circle/Forest Division to other Forest Circle/Forest Division in order to avoid such issues and litigation.

4) It is, therefore, requested that the above instructions may be complied with in letter & spirit and also be circulated amongst lower formation/offices for strict compliance.

ATTESTED

(HAFAZ ABDUL JALIL)
SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded to:-

- 1) All Conservators of Forests/Divisional Forest Officers in Forest Department. They are directed to ensure compliance of the above directions in letter & spirit.
- 2) PS to Secretary, FE&W department, Khyber Pakhtunkhwa.
- 3) PA to Additional Secretary, FE&W department, Khyber Pakhtunkhwa.
- 4) PA to Deputy Secretary-I, FE&W Department, Khyber Pakhtunkhwa.

GB
10/8
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15-5-19

(913)

(51)

Copy of letter No.4868/E dated 25-5-2011 from Chief Conservator of Forests
Khyber Pakhtunkhwa Peshawar addressed to this office

Subject

APPEAL AGAINST CONSERVATOR OF FORESTS
LOWER HAZARA FOREST CIRCLE LETTER No.2557/GE
DATED 12-1-2011

Memo.

Reference your letter No.1957/GE dated 16-5-2011.


The Seniority of Forest Guards is maintained at Divisional level therefore you are requested to decide the same at your own level under the rules / policy.

Sd/- CCF Khyber Pakhtunkhwa Peshawar

~~~~~

No. 4926 /GE dated Abbottabad the 8 /6/2011

Copy in continuation of this office endorsement No. 1624/GE dated 09-4-2011 forwarded to the Divisional Forest Officer Kaghan Forest Division Garhi Habibullah. He is directed to re-examine the service record of Forest Guards carefully and fix their seniority as per rules on the subject under intimation to this office.

  
Conservator of Forests  
Lower Hazara Forest Circle  
Abbottabad

EC

ATTENDED

DFO

14/6/11

VAKALATNAMA

NO. \_\_\_\_\_ /20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAW

TAHIR AYUB

Appellant  
Petitioner  
Plaintiff

VERSUS

Forest Dept ~~XXXXXXXXXXXX~~

Respondent (s)  
Defendants (s)

I/WE TAHIR AYUB

do hereby appoint and constitute the *SYED NOMAN ALI BUKHARI Advocate High Court* for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE \_\_\_\_\_ /20

Tahir

(CLIENT)

ACCEPTED

Syed Noman Ali Bukhari

SYED NOMAN ALI BUKHARI  
ADVOCATE HIGH COURT

CELL NO: 0306-5109438

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

Appeal No. 4826/2021

Mr. Tahir Ayub

V/S

Forest Deptt etc.

.....  
**APPLICATION FOR RESTRAINING THE  
RESPONDENTS FROM FINALIZING THE  
PROMOTION PROCESS FROM FORESTER TO  
DEPUTY RANGER AND GRANT STAY TILL THE  
DISPOSAL OF MAIN APPEAL.**  
.....

**RESPECTFULLY SHEWETH:**

1. That the above titled appeal is pending before this august Tribunal and fixed for today.
2. That the appellant's seniority/promotion is badly affected due to impugned seniority. So the appellant challenge the same in service tribunal. Wherein the Muhammad Naseem was also private respondent.
3. That now the divisional forest officer issue notification on 08.09.2021 and going to conduct meeting of PSB on disputed seniority list, and on which already appeal is pending in this Hon'able Tribunal. If the promotion was made against the said post then the appellant's case will be suffered a lot and will be become infructuous. **Copy of notification is attached as annexure-A.**
4. That the appellant has a good prima facie case and all the ingredients are in favour of appellant.

5. That if the respondents are not restrained from finalizing the promotion process till the Disposal of the above mention appeal. Then the appellant will suffer from irrespective loss.

It is, therefore, most humbly prayed that the respondents may be restrained from finalizing the promotion process on the disputed seniority and grant stay against the promotion from forester to deputy ranger till the disposal of main appeal. Any other remedy with this august Tribunal deems fit may also be awarded in favour of appellant.

  
**APPELLANT**  
Tahir Ayub

THROUGH:

  
(SYED NOMAN ALI BUKHARI)  
**ADVOCATE, HIGH COURT.**

**AFFIDAVIT:**

It is affirmed and declared that the contents of the above Application are true and correct.

  
Deponent



**Syed Muqtada Shah**  
Conservator of Forests  
Lower Hazara Forest Circle  
Abbottabad



Civil Line Forest Offices Abbottabad  
☎ 0992-9310232  
Fax: 0992-9310233  
E-mail: cflhfc@gmail.com

No.                      /GE dated Abbottabad the                      /                     /2021

The Divisional Forest Officers


- 1- Galis Forest Division, Abbottabad
- 2- Siran Forest Division Mansehra

Subject **PROMOTION OF FORESTERS (BPS-10) TO THE RANK OF DEPUTY RANGER (BPS-12)**

Memo

You are directed to supply the ACR files complete in all respect alongwith certificate of No disciplinary /Anti-Corruption /NAB cases and synopsis (**Five set**) on the prescribed format on the subject of the following Foresters on emergent basis for promotion to the rank of Deputy Ranger:-


| S. # | Name of Forester  | Place of posting                 |
|------|-------------------|----------------------------------|
| 1.   | Mr. Iltaf Hussain | Galis Forest Division Abbottabad |
| 2.   | Muhammad Naseem   | Siran Forest Division Mansehra   |
| 3.   | Mr. Zulfiqar      | Galis Forest Division Abbottabad |

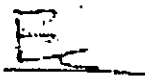
  
Conservator of Forests  
Lower Hazara Forest Circle  
Abbottabad

/GE

Copy forwarded to the:-

- 1- Chief Conservator of Forests, Central Southern Forest Region-I Khyber Pakhtunkhwa Peshawar for favour of information please.
- 2- Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information please.

  
Conservator of Forests  
Lower Hazara Forest Circle  
Abbottabad

  
Do as required

  
7/9

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

**TAHIR AYUB**

**V/S**

**FOREST DEPARTMENT**

**INDEX**

| <b>S.NO</b> | <b>DOCUMENTS</b>                                                                              | <b>ANNEXURE</b> | <b>PAGE</b> |
|-------------|-----------------------------------------------------------------------------------------------|-----------------|-------------|
| 1.          | Reply of Appeal                                                                               | -----           | 01-03       |
| 2.          | Establishment Department<br>Notification No. SOSR-III (FD) 4-<br>141/98 dated 11.7.1998       | A               | 04          |
| 3.          | Civil servant Rules KPK, appointment,<br>promotion & transfer Rules 1989<br>Part-VI Seniority | B               | 05-06       |

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub Division Shinkiari, Mansehra

.....Appellant

**Versus**

1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad
2. The Divisional Forest Officer, Siran Forest Division, Mansehra
3. Muhammad Nazir Forester, Siran Forest Division, Mansehra
4. Muhammad Alam Forester, Siran Forest Division, Mansehra
5. Ali Ahmad Forester, Siran Forest Division, Mansehra
6. Muhammad Siddique Forester, Siran Forest Division, Mansehra
7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra
8. Muhammad Naseem Forester, Siran Forest Division, Mansehra
9. Muhammad Shabir Forester, Siran Forest Division, Mansehra
10. Muhammad Riaz Forester, Siran Forest Division, Mansehra
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra

..... Respondents

**COMMENTS ON BEHALF OF RESPONDENTS**

**RESPECTFULLY SHEWETH,**

**PRELIMINARY OBJECTIONS**

- i. The appellant has no cause of action and locus standi.
- ii. That the appeal is bad for non joinder of necessary parties and mis-joinder or unnecessary parties.
- iii. That the appellant has been estopped by his own conduct to file the appeal.
- iv. That the appeal is against the Law/Procedure and not maintainable in its present form.
- v. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
- vi. That the appellant has not come to this honorable service tribunal with clean hands and suppressed the real facts from this Honorable Tribunal.
- vii. That the competent authority has passed the order after fulfillment of all the codal formalities. Hence the appeal is liable to be dismissed without any further proceedings.

**REPLY ON FACTS**

1. Pertains to service record.
2. Pertains to record, needs no comments.

3. It is incorrect. No junior forest guard was promoted to the rank of forester. The Forest Guards enlisted in the seniority list annexed by the appellant as "C" have rendered pensionable service in the Department in the light of Establishment Department Notification No. SOSR-III (FD) 4-141/98 dated 11.7.1998 (**Annexure-A**). The respondent foresters at serial no. 03 to 11 are appointee of 1981, 1982, 1985, 1986, 1987 and much senior than the appellant & entitled for seniority from the date of appointment, having pensionable service in the light of ibid notification.
4. It is incorrect as explained in para-3 above. The departmental appeal was rejected in the light of provision contained in rule 3(i) of KPK Civil Servant (Appeal) Rules, 1986 as it has no locus standi in the eye of law. The appellant has never objected on promotion of respondent foresters at Serial No. 03 to 11 earlier when their promotion cases were being processed, hence the appellant was agreed on their seniority at that time. Thus according to the law of estoppel, the appellant has accepted their seniority by not challenging at any forum. Hence, the appellant waived his right to appeal.
5. The appeal is barred by law and not maintainable in the present form.

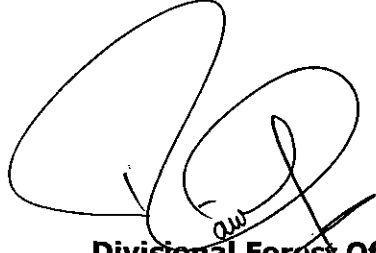
#### **REPLY ON GROUNDS**

- A. It is incorrect. The seniority list was prepared/ maintained according to the Manual of Civil servant Rules KPK, appointment, promotion & transfer Rules 1989, Part-IV Seniority (**Annexure-B**), which is correct. Moreover, the respondent Forester at serial No. 03 to 11 were promoted to the rank of foresters on 04.12.2017, 02.12.2018, 06.03.2019, 10.04.2015, 06.03.2015, 30.06.2015 and 02.12.2018, when the appellant has not agitated upon their seniority. Now the appellant has preferred appeal at this belated stage, which is barred by time and not entertain-able under the provisions of appeal rules 1986.
- B. It is incorrect, the seniority list maintained according to service of respondent foresters. If the appellant had any observation, he might have agitated prior to their promotion orders, but he failed in limitation period and now after lapse of six(06) years, he brought present appeal, which is time barred and not entertain-able under the rules.
- C. It is incorrect, as already elaborated that the seniority was maintained under the rule and law. The appellant is just misleading the honorable court by false, baseless, frivolous and self made story.
- D. It is incorrect. The appellant is rightly placed in the seniority list according to his position as provided in rules. The appeal is illegal & time barred.
- E. It is incorrect. As enunciated in above paras, the appellant has not been deprived from his right. The appellant has no legal point but is just reiterating unlawfully to exaggerate his baseless and extravagant appeal.

- F. It is incorrect. The appeal is time barred & not entertain-able at this belated stage.
- G. As explained in preceding paras, the appellant has no right to agitate the promotion of respondent foresters after passing 03 to 06 years period of their service as foresters. If the appellant had any objection, he might have objected earlier when promotion cases were being processed.
- H. It is incorrect. The administrative department instructions of 02.08.2019, have misinterpreted by the appellant. The administrative department has never instructed to maintain seniority of employees who transferred from other division at bottom level, but advised that:  
*"Henceforth no forester and forest guard etc shall be transferred from their initially appointed forest circle/forest division to other forest circle/forest division in order to avoid such issues and litigation"*  
These instructions are being implemented in whole department in letter and spirit.
- I. The respondents seek permission to raise additional grounds during arguments.

It is therefore, humbly prayed that the subject appeal being baseless, illegal and against the law may kindly be dismissed, please.

  
**Conservator of Forests**  
**Lower Hazara Forest Circle Abbottabad**  
**(Respondent No. 01)**

  
**Divisional Forest Officer**  
**Siran Forest Division**  
**Mansehra**  
**(Respondent No. 02)**

GOVERNMENT OF N.W.F.P.  
FINANCE DEPARTMENT.  
Dated Peshawar, the 11.7.1995

(Amendment - II)  
(Amendment - A)

To

The Director of Forests  
(for N.W.F.P.), Government of N.W.F.P.,  
Forestry, Fisheries & Wildlife  
Department, Peshawar.

Subject: - EMPLOYMENT OF STAFF

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Reference your memo. No. BAA/96-97/Finance/6646-47 dated 27.4.1995 on the subject noted above.

2. The Department advised that pursuant to Services & General Administration Department's letter No. SCRIII(SAG.D)3/B/96 dated 30.3.1995 and in view of that the Projects employees appointed after 30.3.1989 shall be on contract basis and their service shall not be regularized. For all the employees, the entire service of the employees recruited/appointed before 30.3.1989 shall count for the purpose of pensionary benefits provided under the Act and fulfilled. The Administrative Department shall take the necessary steps for the regularization of the employees. No. SCRIII(SAG.D)3/B/95 dated 30.3.1995 shall be taken into account.

1/11/95  
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Dist. No. SUB-III(D)-1111 Dated Peshawar, the 11.7.1995

A copy for information is forwarded to :-

1. The Section Officer (Regulation-III), Govt. of N.W.F.P., Peshawar, for information to the Director (SAG.D) No. SCRIII(SAG.D)3/B/95 dated 30.3.1995.
2. The Section Officer-X, Finance Department, Peshawar.

( MIHAFAT KHAN )  
Section Officer (SAG.D)

(Annexure - B)

(2) If no orders have been made by the day following the completion of the initial probationary period, the period or probation shall be deemed to have been extended, and if no orders have been made by the day on which the maximum period or probation expires, the probationer shall, subject to the proviso to sub-section(3) of section 6 of the North-West Frontier Province Civil Servants Act, 1973, be deemed to have satisfactorily completed his period of probation.

16. **Confirmation:-** After satisfactory completion of the probationary period, a civil servant shall be confirmed; provided that he holds a substantive post, provided further that a civil servant shall not be deemed to have satisfactorily completed his period of probation, if he has failed to pass an examination, test or course or has failed to complete successfully a training prescribed within the meaning of sub-section(3) of Section 6 of the North West Frontier Province Civil Servants Act, 1973

## PART-VI

### SENIORITY

17. **Seniority:-**(1) The seniority inter se of civil servants <sup>1</sup>(appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission <sup>2</sup>{or as the case may be, the Departmental Selection Committee;} provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

**Explanation.1:-** If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

<sup>1</sup> Substituted for the words "appointment to post in the same Basic Pay Scale in a cadre by Notification No. SOR 145 & GADM 1/80 dated 17.5.1980

**Explanation.II:-** If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incompleteness of record or for any other reason not attributing to his fault or demerit.

**Explanation.III:-** A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-a-viz those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

18. **General Rules:-** In all matters not expressly provided for in these rules, civil servants shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

19. **Repeal:-** The North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, are hereby repealed.

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(22)

SENIORITY LIST OF FOREST GUARDS OF SIRAN FOREST DIVISION MANSEHRA AS ON 31-3-2015

| Sl. No. | Name of Forest Guard   | BPS | Birth      | Domicile   | Qualification | Date of:-                     |                                       | Name or No. of Course attended |                  | Remarks                                                          |
|---------|------------------------|-----|------------|------------|---------------|-------------------------------|---------------------------------------|--------------------------------|------------------|------------------------------------------------------------------|
|         |                        |     |            |            |               | Ist. entry into Govt. service | Appointment/promotion as Forest Guard | Selection grade                | Regular Course   |                                                                  |
| 1       | Mr. Muhammad Marcof    | 7   | 3-10-1956  | Mansehra   | Matric        | 15-4-1977                     | 15-4-1977                             |                                | 50th             | -do-                                                             |
| 2       | Raja Zauq Akhtar       | 7   | 7-7-1958   | Mansehra   | FA            | 12-11-1977                    | 12-11-1977                            |                                | 37th             | -do-                                                             |
| 3       | Mr. Sakhi Sultan       | 7   | 15-11-1959 | Mansehra   | Matric        | 20-3-1980                     | 20-3-1980                             |                                | 35th             | Attended 4th                                                     |
| 4       | Mr. Muhammad Yousaf    | 7   | 12-5-1957  | Mansehra   | Matric        | 5-1-1981                      | 5-1-1981                              |                                | 20th             | -do-                                                             |
| 5       | Mr. Muhammad Bashir    | 7   | 15-2-1961  | Mansehra   | Middle        | 21-2-1981                     | 21-2-1981                             |                                | 40 <sup>th</sup> | -do-                                                             |
| 6       | Mr. Muhammad Riaz      | 7   | 20-3-1964  | Mansehra   | Matric        | 18-10-1982                    | 18-10-1982                            |                                |                  | Recommended for promotion in DPC, but waiting for Enquiry Report |
| 7       | Mr. Muhammad Razaqat   | 7   | 9-3-1959   | Mansehra   | Matric        | 1-3-1984                      | 1-3-1984                              |                                | 30 <sup>th</sup> | Attended 8th                                                     |
| 8       | Mr. Muhammad Saddique  | 7   | 1-4-1965   | Abbottabad | Matric        | 2-12-1985                     | 2-12-1985                             |                                | 24 <sup>th</sup> | -do-<br>Arrives from Pato Squad Dwn. Atc                         |
| 9       | Mr. Ahmed Nawaz        | 7   | 1-1-1968   | Mansehra   | F.A           | 4-5-1986                      | 4-5-1986                              |                                | 37 <sup>th</sup> | -do-                                                             |
| 10      | Mr. Muhammad Shabir    | 7   | 1-2-1965   | Mansehra   | Matric        | 11-4-1987                     | 11-4-1987                             |                                | 36th             | -do-                                                             |
| 11      | Mr. Rustam Khan        | 7   | 15-1-1968  | Mansehra   | Matric        | 9-5-1987                      | 9-5-1987                              |                                | 30 <sup>th</sup> | -do-                                                             |
| 12      | Mr. Muhammad Tayyub    | 7   | 12-4-1966  | Mansehra   | FA            | 17-8-1987                     | 17-8-1987                             |                                | 32 <sup>nd</sup> | Attended 2 <sup>nd</sup>                                         |
| 13      | Mr. Muhammad Alam      | 7   | 3-7-1968   | Mansehra   | Matric        | 18-8-1987                     | 18-8-1987                             |                                | 49th             | Not attended                                                     |
| 14      | Mr. Muhammad Nazir-II  | 7   | 1-5-1967   | Mansehra   | Matric        | 10-10-1987                    | 10-10-1987                            |                                | 28th             | Not attended                                                     |
| 15      | Mr. Ishliq Ahmad       | 7   | 4-4-1970   | Mansehra   | Matric        | 17-4-1988                     | 17-4-1988                             |                                | 25th             | -do-                                                             |
| 16      | Mr. Waqar Ahmad        | 7   | 3-4-1964   | Mansehra   | FA            | 3-8-1988                      | 3-8-1988                              |                                | 31 <sup>st</sup> | -do-                                                             |
| 17      | Mr. Muhammad Iltaf     | 7   | 1-3-1967   | Mansehra   | Matric        | 9-12-1989                     | 9-12-1989                             |                                | 30th             | -do-                                                             |
| 18      | Mr. Zafeer Ahmad       | 7   | 1-10-1971  | Mansehra   | BA            | 12-12-1989                    | 12-12-1989                            |                                | 28th             | -do-                                                             |
| 19      | Mr. Muhammad Mushtaq   | 7   | 11-5-1966  | Mansehra   | Matric        | 22-1-1990                     | 22-1-1990                             |                                | 31 <sup>st</sup> | Not attended                                                     |
| 20      | Mr. Muhammad Tasleem   | 7   | 1-2-1968   | Mansehra   | Matric        | 22-1-1990                     | 22-1-1990                             |                                | 34th             | -do-                                                             |
| 21      | Mr. Sajjad Ahmad       | 7   | 20-3-1970  | Mansehra   | Matric        | 22-1-1990                     | 22-1-1990                             |                                | Trained          | Attended 6th                                                     |
| 22      | Mr. Abdul Ghafoor      | 7   | 15-3-1968  | Mansehra   | FA            | 11-6-1990                     | 11-6-1990                             |                                | 33 <sup>rd</sup> | -do- 5th                                                         |
| 23      | Mr. Tahir Ayub         | 7   | 1-6-1970   | Mansehra   | FA            | 15-7-1990                     | 15-7-1990                             |                                | 49th             | Not attended                                                     |
| 24      | Mr. Ali Aachai         | 7   | 11-11-1958 | Mansehra   | Matric        | 2-10-1986                     | 30-7-1990                             |                                | 48th             | -do-                                                             |
| 25      | Mr. Muhammad Haroon-II | 7   | 20-4-1970  | Abbottabad | Matric        | 18-9-1991                     | 18-9-1991                             |                                | 32 <sup>nd</sup> | -do-                                                             |
| 26      | Mr. Ejaz Hussain Shah  | 7   | 1-3-1972   | Mansehra   | Matric        | 1-9-1992                      | 1-9-1992                              |                                | 34th             | Attended 9th                                                     |
| 27      | Mr. Abdul Waheed-I     | 7   | 1-4-1974   | Mansehra   | Matric        | 2-9-1992                      | 2-9-1992                              |                                | 60th             | Not attended                                                     |
| 28      | Mr. Muhammad Ilyas     | 7   | 4-4-1971   | Abbottabad | FA            | 14-3-1993                     | 7-10-2005                             |                                | 59th             | Not attended                                                     |
| 29      | Mr. Muhammad Ilyas     | 7   | 12-2-65    | AID        | Matric        | 1-7-85                        | 11-4-83                               |                                | 25 <sup>th</sup> |                                                                  |

**ATTENDED**

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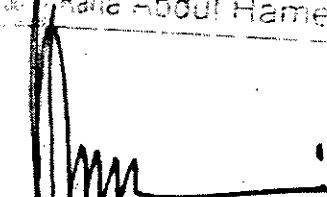
|    |                         |   |            |            |        |            |            |         |                  |            |
|----|-------------------------|---|------------|------------|--------|------------|------------|---------|------------------|------------|
| 29 | Mr. Muhammad Javed      | 7 | 15-5-1980  | Mansehra   | Matric | 1-7-2004   | 1-7-2004   |         |                  |            |
| 30 | Mr. Muhammad Gulab      | 7 | 31-3-1976  | Mansehra   | Matric | 26-3-2007  | 26-3-2007  | 17-2004 | Un-trained       | do         |
| 31 | Mr. Muhammad Arshad     | 7 | 1-1-1977   | Mansehra   | Matric | 14-3-2008  | 14-3-2008  |         | 59 <sup>th</sup> | Attended ? |
| 32 | Mr. Muhammad Saddique   | 7 | 17-2-1984  | Mansehra   | Matric | 14-3-2008  | 14-3-2008  |         | Un-trained       | do         |
| 33 | Mr. Asad Iqbal          | 7 | 16-12-1979 | Mansehra   | Matric | 15-3-2008  | 15-3-2008  |         | 73 <sup>rd</sup> | do         |
| 34 | Mr. Muhammad Anil-II    | 7 | 15-2-1978  | Mansehra   | Matric | 30-4-2008  | 30-4-2008  |         | 67 <sup>th</sup> | do         |
| 35 | Shahzad Anjum           | 7 | 19-12-1974 | Mansehra   | Matric | 28-2-2009  | 28-2-2009  |         | Un-trained       | do         |
| 36 | Mr. Muhammad Asif       | 7 | 8-4-1980   | Mansehra   | F.A    | 16-7-2009  | 16-7-2009  |         | do               | do         |
| 37 | Mr. Muhammad Bashir     | 7 | 15-2-1961  | Mansehra   | Middle | 21-2-1981  | 21-2-1981  |         | 72 <sup>nd</sup> | do         |
| 38 | Mr. Niaz Zubair         | 7 | 14-3-1980  | Mansehra   | Matric | 1-8-2009   | 1-8-2009   |         | 40 <sup>th</sup> | do         |
| 39 | Mr. Muhammad Pervaz     | 7 | 23-8-1962  | Mansehra   | Matric | 15-6-1981  | 15-6-1981  |         | 73 <sup>rd</sup> | do         |
| 40 | Syed Mujtaba Ali Shah   | 7 | 8-2-1990   | Mansehra   | F.Sc   | 12-10-2010 | 12-10-2010 |         | 35 <sup>th</sup> | do         |
| 41 | Mr. Aurangzeb           | 7 | 15-4-1972  | Mansehra   | Matric | 2-11-2010  | 2-11-2010  |         | 72 <sup>nd</sup> | do         |
| 42 | Niaz Muhammad           | 7 | 10-2-1981  | Mansehra   | Matric | 3-5-2011   | 3-5-2011   |         | 40 <sup>th</sup> | do         |
| 43 | Muhammad Iqbal          | 7 | 20-9-1968  | Abbottabad | Matric | 17-8-1987  | 17-8-1987  |         | Un-trained       | do         |
| 44 | Waseem Khan             | 7 | 4-8-1993   | Mansehra   | FSc    | 31-12-2013 | 31-12-2013 |         | 29 <sup>th</sup> | do         |
| 45 | Abdul Saboor            | 7 | 10-5-1986  | Mansehra   | FA     | 17-3-2015  | 17-3-2015  |         | Un-trained       | do         |
| 46 | Khuram Shahzad          | 7 | 20-5-1986  | Mansehra   | BA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 47 | Rasat Ali               | 7 | 12-9-1986  | Mansehra   | BA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 48 | Muhammad Safeer         | 7 | 10-1-1988  | Mansehra   | BA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 49 | Syed Hamad Hussain Shah | 7 | 15-5-1988  | Mansehra   | B.Com  | 17-3-2015  | 17-3-2015  |         |                  |            |
| 50 | Muhammad Adil           | 7 | 3-10-1988  | Mansehra   | MA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 51 | Syed Bilal Hussain Shah | 7 | 21-4-1989  | Mansehra   | BSc    | 17-3-2015  | 17-3-2015  |         |                  |            |
| 52 | Mr. Mehmood             | 7 | 24-9-1989  | Mansehra   | FA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 53 | Mr. Qasim               | 7 | 17-2-1990  | Mansehra   | BA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 54 | Ahmad                   | 7 | 15-7-1990  | Mansehra   | FA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 55 | Muhammad Farooq         | 7 | 11-12-1990 | Mansehra   | B.Com  | 17-3-2015  | 17-3-2015  |         |                  |            |
| 56 | Saidar Hussain Shah     | 7 | 01-2-1991  | Mansehra   | FA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 57 | Abd Khan                | 7 | 15-4-1991  | Mansehra   | BA     | 17-3-2015  | 17-3-2015  |         |                  |            |
| 58 | Muhammad Naseem Khan    | 7 | 20-4-1991  | Mansehra   | B.Com  | 17-3-2015  | 17-3-2015  |         |                  |            |
| 59 | Umer Sharif             | 7 | 26-8-1991  | Mansehra   | F.Sc   | 17-3-2015  | 17-3-2015  |         |                  |            |
| 60 | Muhammad Amir           | 7 | 3-11-1991  | Mansehra   | FA     | 17-3-2015  | 17-3-2015  |         |                  |            |

ATTESTED

Arrived from Kaghar Dwr

Arrived from Kunhar Watershed Division Mansehra

|    |                    |   |   |   |           |          |       |           |           |
|----|--------------------|---|---|---|-----------|----------|-------|-----------|-----------|
| 81 | Hamad Arshad       | ✓ | ✓ | 7 | 28-8-1992 | Mansehra | F.Sc  | 17-3-2015 | 17-3-2015 |
| 82 | Asad-Ul-Rehman     | ✓ | ✓ | 7 | 01-3-1993 | Mansehra | D.Com | 17-3-2015 | 17-3-2015 |
| 83 | Farid Hussain      | ✓ |   | 7 | 9-10-1993 | Mansehra | MA    | 17-3-2015 | 17-3-2015 |
| 84 | Mati-Ul-Islam Khan | ✓ | ✓ | 7 | 15-1-1994 | Mansehra | FA    | 17-3-2015 | 17-3-2015 |
| 85 | Miaq Ahmad         | f |   | 7 | 01-4-1994 | Mansehra | F.Sc  | 17-3-2015 | 17-3-2015 |
| 86 | Rana Abdul Hameed  | ✓ |   | 7 | 28-7-1996 | Mansehra | F.Sc  | 18-3-2015 | 18-3-2015 |

  
 Forest Officer  
 Forest Division Mansehra

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal NO: 4826/2021**

Tahir Ayub

Vs

Forest Depttt:

**SUBJECT:**

**APPLICATION FOR NECESSARY AMENDMENT  
IN THE INSTANT APPEAL DUE TO  
INADVERTENTLY PRAYER WAS NOT  
PREPARED ACCORDINGLY I.E  
INADVERTENTLY MENTIONED AGAINST THE  
SENIORITY LIST DATED 31.12.2019 WHICH  
WOULD BE AMENDED AS CONSEQUENTIAL  
BENEFITS REFUSED AFTER GIVING PROPER  
SENIORITY.**

**RESPECTFULLY SHEWETH:**

1. That the petitioner has filed the Service Appeal inadvertently against the seniority list dated 31.12.2019.
2. That the service appeal was heard and comments were called from the respondents, but the prayer of the service appeal was not prepared properly according to the facts of the case because the appellant filed application for correction of the seniority and the seniority was corrected vide seniority list dated 31.12.2019 and the seniority was properly prepared but benefits of the corrected seniority was refused to the appellant, but inadvertently corrected seniority list mentioned in the prayer as impugned seniority list
3. That now the claimed of the appellant was only to the extent of consequential benefits of the corrected seniority list, which was denied to the appellant by the respondents in appellate order.
4. That now to meet the legal requirement, it is necessary to amend the instant appeal to the extent of prayer as the consequential benefits of the corrected seniority list dated 31.12.2019 may be granted to the appellant to meet the ends of justice and also to avoid the legal complication to meet the ends of justice.

5. That the service appeal is in arguments stage and this august Court has the legal authority to give permission for amendment in the instant appeal and in the prayer of service appeal to the extent of consequential benefits.

It is, therefore, most humbly prayed that on acceptance of this application the permission may be granted for amendment in the instant appeal. Any other remedy which the august court deems appropriate that may also be awarded in the favor of petitioner.

  
**APPELLANT**  
Tahir Ayub

**THROUGH:**

  
**SYED NOMAN ALI BUKHARI**  
**ADVOCATE, PESHAWAR.**

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal NO: 4826/2021**

Tahir Ayub

Vs

Forest Deptt:

**AFFADAVIT**

I, Tahir Ayub Appellant do hereby affirm that the contents of this application are true and correct and nothing has been concealed from the Hon'ble Court.



*[Signature]*  
**Deponent**

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

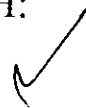
Mr. Tahir Ayub Forest **VERSUS** The Conservator etc.

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| 6    | Vakalatnama   | --         | 21    |

**PETITIONERS**

THROUGH:



**TANWEER AHMAD DIN**

**(ADVOCATE HIGH COURT)**

**PH# 03008110806**

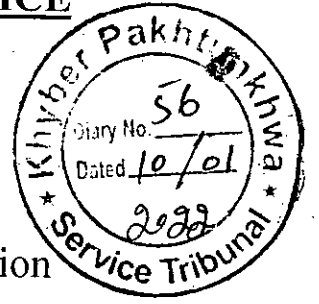
*Put up to the court with  
relevant appeal.*

*10/01/2024*

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

APPEAL NO. 2021



Mr. Tahir Ayub Forest Guard Lower Siran Forest Division  
Shinkiyari, Mansehra (Appellant)

**VERSUS**

The Conservator of Forests, Lower Hazara Forest Circle  
Abbottabad and others. (Respondents).

**APPEAL UNDER SECTION 4 OF THE 'KHYBER PAKHTUNKHWA  
SERVICE TRIBUNALS ACT, 1974**

**APPLICATION FOR SETTING ASIDE  
EX PARTE PROCEEDINGS AND  
ORDER DATED 15-10-2021 AGAINST  
RESPONDENTS NO. 3, 4, 6, 7 and 11**

**RESPECTFULLY SHEWETH**

1. That the above titled appeal is pending for adjudication before this tribunal. Today, the case is fixed for further proceedings. That respondent number 3, 4, 6, 7 and 11 are serving in Forest Department.
2. That Honourable court issued the notices to the respondents on 15-10-2021 for attendance. (Notice is attached with the application as Annexure A.)



(2)

3. That the Forest Department that is respondent number 2 after receiving the notices called us and prepared reply and obtained signatures of respondents on documents. Thereafter, Department assured the respondents that they filed reply on behalf of all the respondents. (Copy of reply on behalf of Department is annexed as **Annexure B.**)
4. That the respondent number 1 and 2 omitted the names of respondent number 3, 4, 6, 7 and 11 from the reply / comments submitted by the Department.
5. That on 7-1-2022 it came to the knowledge of respondents that Ex parte proceedings were initiated against them on 15-10-2021. (Copy of order is annexed as **Annexure C.**)
6. That after knowledge of proceedings, the instant application is well within time.

#### **GROUND**

1. That the respondents are serving under the respondent number 1 and 2 in Forest Department and valuable rights are attached with the instant appeal.
2. That the Ex parte proceedings passed by the Honourable tribunal against the respondents is not tangible in the eyes of law as absence of respondents is unintentional due to above-mentioned reasons.

2-A

3. That the Ex parte proceedings conducted against the respondents is against the law and the principle of natural justice and equity (NO PERSON SHOULD BE CONDEMNED UNHEARD).
4. That the Ex parte proceedings is against the fundamental rights which are guaranteed by constitution of Islamic Republic of Pakistan.
5. That the respondents were not given the opportunity to defend, submit reply and rejoining in the instant appeal which will cause irreparable loss.
6. That there is no personal service made to the respondents on their personal address.
7. That all the proceedings were carried out in absentia of the respondents.
8. Other points will be raised at the time of arguments.

**PRAYER**

It is therefore, most humbly prayed that on the acceptance of instant application the ex parte proceedings initiated against respondents number 3,4,6,7 and 11 may graciously be set aside and give opportunity of right to defend and reply and rejoining in appeal or any other efficacious remedy deemed fit may please be granted by this Honourable tribunal in favour of respondents.

Petitioners  
Through Counsel  
Tanweer Ahmad Din Advocate  
High Court  
District Courts Mansehra

3

**AFFIDAVIT.**

We, Muhammad Nazir Forester, Muhammad Alam Forester, Muhammad Sadiq Forester, Ahmad Nawaz Forester, Muhammad Parvaiz Forester all from Siran Forest Division, Mansehra, do hereby solemnly affirm and declare on oath that the contents of the foregoing application are true and correct and nothing has been concealed from this Honourable Tribunal.

**Dated 10.01.2022**

**(DEPONENTS)**

**Muhammad Siddique, Ahmad Nawaz, Muhammad Alam,**

*Muhammad Siddique*  
*M. Siddique*

*Ahmad Nawaz*

*Muhammad Alam*  
*M. Alam*



8

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

S.B

No.

Appeal No. 4826 of 20 21

Mr. Tahir Ayub Appellant/Petitioner

Versus

The conservator forest Hazara A. Abood. Respondent

Recd

Respondent No. 110

Notice to: —

Muhammad Perwaiz forest officer, Siran forest  
Division Manshera.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 15/10/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. .... dated .....~~

Given under my hand and the seal of this Court, at Peshawar this 10/10/2021

Day of ..... 20 21

(for Reply)

Be Jaffer  
do the need for  
2/10

Registrar

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub Division Shinkiari, Mansehra

.....Appellant

**Versus**

- 1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad
- 2. The Divisional Forest Officer, Siran Forest Division, Mansehra
- 3. Muhammad Nazir Forester, Siran Forest Division, Mansehra
- 4. Muhammad Alam Forester, Siran Forest Division, Mansehra
- 5. Ali Ahmad Forester, Siran Forest Division, Mansehra
- 6. Muhammad Siddique Forester, Siran Forest Division, Mansehra
- 7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra
- 8. Muhammad Naseem Forester, Siran Forest Division, Mansehra
- 9. Muhammad Shabir Forester, Siran Forest Division, Mansehra
- 10. Muhammad Riaz Forester, Siran Forest Division, Mansehra
- 11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra

..... Respondents

**COMMENTS ON BEHALF OF RESPONDENTS**

**RESPECTFULLY SHEWETH,**

**PRELIMINARY OBJECTIONS**

- i. The appellant has no cause of action and locus standi.
- ii. That the appeal is bad for non joinder of necessary parties and mis-joinder or unnecessary parties.
- iii. That the appellant has been estopped by his own conduct to file the appeal.
- iv. That the appeal is against the Law/Procedure and not maintainable in its present form.
- v. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
- vi. That the appellant has not come to this honorable service tribunal with clean hands and suppressed the real facts from this Honorable Tribunal.
- vii. That the competent authority has passed the order after fulfillment of all the codal formalities. Hence the appeal is liable to be dismissed without any further proceedings.

**REPLY ON FACTS**

- 1. Pertains to service record.
- 2. Pertains to record, needs no comments.

- (10)
3. It is incorrect. No junior forest guard was promoted to the rank of forester. The Forest Guards enlisted in the seniority list annexed by the appellant as "C" have rendered pensionable service in the Department in the light of Establishment Department Notification No. SOSR-III (FD) 4-141/98 dated 11.7.1998 (**Annexure-A**). The respondent foresters at serial no. 03 to 11 are appointee of 1981, 1982, 1985, 1986, 1987 and much senior than the appellant & entitled for seniority from the date of appointment, having pensionable service in the light of ibid notification.
  4. It is incorrect as explained in para-3 above. The departmental appeal was rejected in the light of provision contained in rule 3(i) of KPK Civil Servant (Appeal) Rules, 1986 as it has no locus standi in the eye of law. The appellant has never objected on promotion of respondent foresters at Serial No. 03 to 11 earlier when their promotion cases were being processed, hence the appellant was agreed on their seniority at that time. Thus according to the law of estoppel, the appellant has accepted their seniority by not challenging at any forum. Hence, the appellant waived his right to appeal.
  5. The appeal is barred by law and not maintainable in the present form.

#### **REPLY ON GROUNDS**

- A. It is incorrect. The seniority list was prepared/ maintained according to the Manual of Civil servant Rules KPK, appointment, promotion & transfer Rules 1989, Part-IV Seniority (**Annexure-B**), which is correct. Moreover, the respondent Forester at serial No. 03 to 11 were promoted to the rank of foresters on 04.12.2017, 02.12.2018, 06.03.2019, 10.04.2015, 06.03.2015, 30.06.2015 and 02.12.2018, when the appellant has not agitated upon their seniority. Now the appellant has preferred appeal at this belated stage, which is barred by time and not entertain-able under the provisions of appeal rules 1986.
- B. It is incorrect, the seniority list maintained according to service of respondent foresters. If the appellant had any observation, he might have agitated prior to their promotion orders, but he failed in limitation period and now after lapse of six(06) years, he brought present appeal, which is time barred and not entertain-able under the rules.
- C. It is incorrect, as already elaborated that the seniority was maintained under the rule and law. The appellant is just misleading the honorable court by false, baseless, frivolous and self made story.
- D. It is incorrect. The appellant is rightly placed in the seniority list according to his position as provided in rules. The appeal is illegal & time barred.
- E. It is incorrect. As enunciated in above paras, the appellant has not been deprived from his right. The appellant has no legal point but is just reiterating unlawfully to exaggerate his baseless and extravagant appeal.

(10) (11)

F. It is incorrect. The appeal is time barred & not entertain-able at this belated stage.

G. As explained in preceding paras, the appellant has no right to agitate the promotion of respondent foresters after passing 03 to 06 years period of their service as foresters. If the appellant had any objection, he might have objected earlier when promotion cases were being processed.

H. It is incorrect. The administrative department instructions of 02.08.2019, have misinterpreted by the appellant. The administrative department has never instructed to maintain seniority of employees who transferred from other division at bottom level, but advised that:

*"Henceforth no forester and forest guard etc shall be transferred from their initially appointed forest circle/forest division to other forest circle/forest division in order to avoid such issues and litigation"*

These instructions are being implemented in whole department in letter and spirit.

I. The respondents seek permission to raise additional grounds during arguments.

It is therefore, humbly prayed that the subject appeal being baseless, illegal and against the law may kindly be dismissed, please.

**Conservator of Forests  
Lower Hazara Forest Circle Abbottabad  
(Respondent No. 01)**

**Divisional Forest Officer  
Siran Forest Division  
Mansehra  
(Respondent No. 02)**

Annex "B"

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

(12)

**TAHIR AYUB**

**V/S**

**FOREST DEPARTMENT**

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| 2.          | Establishment Department<br>Notification No. SOSR-III (FD) 4-<br>141/98 dated 11.7.1998       | A               | 04          |
| 3.          | Civil servant Rules KPK, appointment,<br>promotion & transfer Rules 1989<br>Part-VI Seniority | B               | 05-06       |



(13)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub Division Shinkiari, Mansehra

.....Appellant

**Versus**

1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad
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3. Muhammad Nazir Forester, Siran Forest Division, Mansehra
4. Muhammad Alam Forester, Siran Forest Division, Mansehra
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7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra
8. Muhammad Naseem Forester, Siran Forest Division, Mansehra
9. Muhammad Shabir Forester, Siran Forest Division, Mansehra
10. Muhammad Riaz Forester, Siran Forest Division, Mansehra
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra

..... Respondents

**COMMENTS ON BEHALF OF RESPONDENTS**

**RESPECTFULLY SHEWETH,**

**PRELIMINARY OBJECTIONS**

- i. The appellant has no cause of action and locus standi.
- ii. That the appeal is bad for non joinder of necessary parties and mis-joinder or unnecessary parties.
- iii. That the appellant has been estopped by his own conduct to file the appeal.
- iv. That the appeal is against the Law/Procedure and not maintainable in its present form.
- v. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
- vi. That the appellant has not come to this honorable service tribunal with clean hands and suppressed the real facts from this Honorable Tribunal.
- vii. That the competent authority has passed the order after fulfillment of all the codal formalities. Hence the appeal is liable to be dismissed without any further proceedings.

**REPLY ON FACTS**

1. Pertains to service record.
2. Pertains to record, needs no comments.

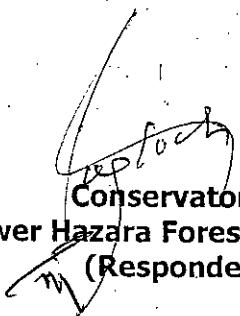
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- 5. The appeal is barred by law and not maintainable in the present form.


**REPLY ON GROUNDS**

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- B. It is incorrect, the seniority list maintained according to service of respondent foresters. If the appellant had any observation, he might have agitated prior to their promotion orders, but he failed in limitation period and now after lapse of six(06) years, he brought present appeal, which is time barred and not entertain-able under the rules.
- C. It is incorrect, as already elaborated that the seniority was maintained under the rule and law. The appellant is just misleading the honorable court by false, baseless, frivolous and self made story.
- D. It is incorrect. The appellant is rightly placed in the seniority list according to his position as provided in rules. The appeal is illegal & time barred.
- E. It is incorrect. As enūnciated in above paras, the appellant has not been deprived from his right. The appellant has no legal point but is just reiterating unlawfully to exaggerate his baseless and extravagant appeal.

- F. It is incorrect. The appeal is time barred & not entertain-able at this belated stage.
- G. As explained in preceding paras, the appellant has no right to agitate the promotion of respondent foresters after passing 03 to 06 years period of their service as foresters. If the appellant had any objection, he might have objected earlier when promotion cases were being processed.
- H. It is incorrect. The administrative department instructions of 02.08.2019, have mis-interpreted by the appellant. The administrative department has never instructed to maintain seniority of employees who transferred from other division at bottom level, but advised that:  
*"Henceforth no forester and forest guard etc shall be transferred from their initially appointed forest circle/forest division to other forest circle/forest division in order to avoid such issues and litigation"*  
These instructions are being implemented in whole department in letter and spirit.
- I. The respondents seek permission to raise additional grounds during arguments.

It is therefore, humbly prayed that the subject appeal being baseless, illegal and against the law may kindly be dismissed, please.

  
**Conservator of Forests**  
**Lower Hazara Forest Circle Abbottabad**  
**(Respondent No. 01)**

  
**Divisional Forest Officer**  
**Siran Forest Division**  
**Mansehra**  
**(Respondent No. 02)**

(16)

Annex 'C'

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 4826 /2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1633

Dated 25/1/2021

Mr. Tahir Ayub Forest Guard  
Lower Seeran Forest  
Division Shinkiyari, Mansehra



(Appellant)

VERSUS

1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad.
2. The Divisional Forest Officer Siran Forest Division, Mansehra.
3. Muhammad Nazir, Forester, Siran Forest Division, Mansehra.
4. Muhammad Alam Forester, Siran Forest Division, Mansehra.
5. Ali Ahmad Forester, Siran Forest Division, Mansehra.
6. Muhammad SadiQ Forester, Siran Forest Division, Mansehra.
7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra.
8. Muhammad Naseem Forester, Siran Forest Division, Mansehra.
9. Muhammad Shabir Forester, Siran Forest Division, Mansehra.
10. Muhammad Riaz Forester, Siran Forest Division, Mansehra.
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra.

Filed to-day

Registrar

25/01/2021

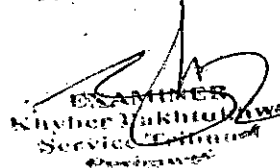
Re-submitted to -day  
and filed.

Registrar

14/4/2021

(Respondents).

.....  
APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974  
AGAINST THE IMPUGNED SENIORITY LIST DATED  
ATTESTED

  
Registrar  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

17



03.11.2021

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Former made a request for adjournment in order to submit rejoinder; granted. To come up for rejoinder/arguments on 10.01.2022 before D.B.

(Rozina Rehman)  
Member (J)

Chairman

**Certified to be true copy**

**EXAMINED**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 07-01-22  
 Number of Words 1600  
 Copying Fee 18/-  
 Urgent \_\_\_\_\_  
 Total 18/-  
 Name of Copyist \_\_\_\_\_  
 Date of Completion of Copy 10-01-22  
 Date of Delivery of Copy 10-01-22

Appeal No. 4826/2021  
Tahir Ayub vs Govt

18

12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

Stipulated period passed reply not submitted.

15.10.2021

Appellant with counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Syed Javid Ali S.D.F.O for official respondents No.1 & 2 present and submitted reply. Nemo for private respondents No.3 to 11, hence placed ex-parte.

An application has been submitted for restraining the respondents from finalizing the promotion cases from Forester to Deputy Ranger. Notice of the application be also given to the respondents. To come up for arguments on 03/11/2021 before D.B.

In the meanwhile, the respondents shall not finalize the promotion to the post subjudice before the Tribunal.

(Atiq-Ur-Rehman Wazir)  
Member (E)

(Rozina Rehman)  
Member (J)

ATTESTED  
EXAMINER  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR



19

08.06.2021 Counsel for the appellant present. Preliminary arguments heard.

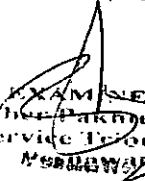
Points raised need consideration. The appeal is admitted to regular hearing, subject to all legal and just objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 15.10.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

8/6/21

  
Chairman

ATTESTED

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

20

Form- A

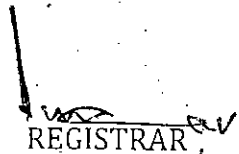
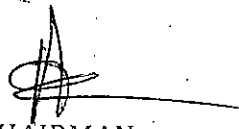
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. -

4876

/2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge                                                                                                                                                                                                                                                                                  |
|-------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1     | 2                         | 3                                                                                                                                                                                                                                                                                                                                   |
| 1-    | 14/04/2021                | <p>The appeal of Mr. Tahir Ayub resubmitted today by Syed Noman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><br/>REGISTRAR,</p> |
| 2-    | 27/05/21                  | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/06/21</u></p> <p style="text-align: right;"><br/>CHAIRMAN</p>                                                                                        |



DBAM No. 244

7950

District Bar Association  
MansheraBC No. 10-2876

S.No

Fee Rs. 100/- 21Name of Advocate تنویر احمد دین

وکالت نامہ

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar: بعدالت

Mr TAHIR AYUB FORESTER versus THE CONSERVATOR ETC.

APPLICATION IN SERVICE APPEAL RESPONDENT NO. 3,4,6,7,11

نوعیت مقدمہ:

منجانب:

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دی بہ مقام PESHAWAR کے لئے

TANVEER AHMAD DIN ADVOCATE HIGH COURT

کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر منظر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دہاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری کی طرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف کو بشرط ادا نیگی علیحدہ مختصانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پر داختم وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سندر ہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

مورخہ 7<sup>th</sup> JANUARY 2022

ACCEPTED

محمد یونس خان  
Respondent 11

کدھوں نا لکھ  
Respondent 6

محمد یونس خان  
Respondent 3

Respondent 4  
Respondent 7  
Respondent 11

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub Division Shinkiari, Mansehra

.....Appellant

**Versus**

1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad
2. The Divisional Forest Officer, Siran Forest Division, Mansehra
3. Muhammad Nazir Forester, Siran Forest Division, Mansehra
4. Muhammad Alam Forester, Siran Forest Division, Mansehra
5. Ali Ahmad Forester, Siran Forest Division, Mansehra
6. Muhammad Siddique Forester, Siran Forest Division, Mansehra
7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra
8. Muhammad Naseem Forester, Siran Forest Division, Mansehra
9. Muhammad Shabir Forester, Siran Forest Division, Mansehra
10. Muhammad Riaz Forester, Siran Forest Division, Mansehra
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra

..... Respondents

**INDEX**

| <b>S.NO</b> | <b>DOCUMENTS</b>                               | <b>ANNEXURE</b> | <b>PAGE</b> |
|-------------|------------------------------------------------|-----------------|-------------|
| 1.          | Parawise comments with affidavit               | -----           | 01-03       |
| 2.          | Corrected seniority list dated 31.12.2019      | 1               | 04-07       |
| 3.          | Tentative seniority list dated 31.12.2021      | 2               | 08-11       |
| 4.          | Final Seniority list dated 31.05.2022          | 3               | 12-15       |
| 5.          | DFO Siran office Order No: 32 dated 19.08.2022 | 4               | 16          |

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub Division Shinkiari, Mansehra

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10. Muhammad Riaz Forester, Siran Forest Division, Mansehra
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra

..... Respondents

**COMMENTS ON BEHALF OF RESPONDENTS 1 to 4**

**RESPECTFULLY SHEWETH,**

**PRELIMINARY OBJECTIONS**

- i. The appellant has no cause of action and locus standi to file the present appeal.
- ii. That the appeal is bad for non joinder of necessary parties and mis-joinder or un-necessary parties.
- iii. That the appellant has been estopped by his own conduct to file the appeal.
- iv. That the appeal is against the Law/Procedure and not maintainable in its present form.
- v. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
- vi. That the appellant has not come to this honorable service tribunal with clean hands and suppressed the real facts from this Honorable Tribunal.
- vii. That the competent authority has passed the order after fulfillment of all the codal formalities. Hence the appeal is liable to be dismissed without any further proceedings.
- viii. That the appeal is barred by law and limitation.

**REPLY FACTUAL**

1. It is correct. That the Petitioner has filed the service appeal inadvertently against the tentative seniority list of forest guard dated 31.12.2019 and corrected seniority list dated 31.12.2021 as such to seniority list of 31.12.2019 was circulated to all effective strength of forest guards but after lapse of one month no omission / discrepancies received from all forest guards including petitioner. The final seniority list dated 31.05.2022 was circulated to all effective strength of forest guards including petitioner and On the base of same seniority all senior most forest guards including petitioner promoted to the rank of forester against the existing posts vide DFO Siran office order No: 32 dated 19.08.2022(copy enclosed as **Annexure-1, 2, 3 & 4**).
2. It is correct. The service appeal heard in Service Tribunal Peshawar and comments /reply filed by the respondents, the petitioner admitted that service appeal was not prepared properly accordingly to the fact of the case and also requested for correction of seniority list. The seniority list corrected by the respondent No: 2 which was circulated dated 31.12.2021 and subsequently final seniority list was circulated dated 31.05.2022. On the basis of that seniority the petitioner was promoted to the rank of Forester as mentioned in para-1(Annexure-2 & 3)
3. Incorrect. Upon the corrected seniority list the petitioner resultantly promoted to the rank of Forester(BPS-10) vide DFO Siran office order 32 dated 19.08.2022. The seniority of Forester to be maintain by respondent No: 1 the petitioner needs to prayer of any issue i-e: seniority and top of that consequential benefit before respondent No:1.
4. It is incorrect. The consequential benefit so far relates to the petitioner has already been granted as explained in para-3.
5. Pertains to court. Needs no comments.

It is therefore, humbly prayed that the subject appeal being baseless, illegal and against the law may kindly be dismissed, please.

  
**Conservator of Forests**  
**Lower Hazara Forest Circle Abbottabad**  
**(Respondent No. 01)**

  
**Divisional Forest Officer**  
**Siran Forest Division**  
**Mansehra**  
**(Respondent No. 02)**

3

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

**Service Appeal No.4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub Division Shinkiari, Mansehra

.....Appellant

**Versus**

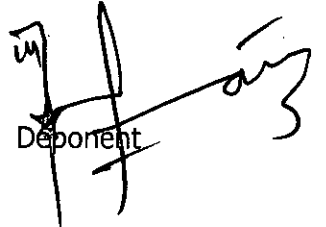
1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad
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..... Respondents

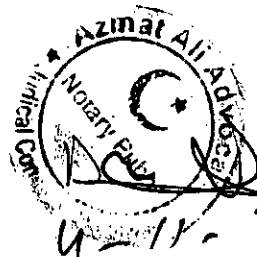
**AFFIDAVIT**

I Mr. Irfanullah Muhammadi, SDFO Upper Siran Forest Sub-Division, do hereby solemnly affirms and declare that the contents of the accompanying parawise comments submitted by respondent No: 1 & 2 are true and correct to the best of my knowledge and belief that noting has been concealed from this Honorable Court.

Identified by:

  
Deponent

**ATTESTED**



(17)

GOVERNMENT OF KHYBER PAKHTUNKHWA FORESTRY, ENVIRONMENT AND WILDLIFE DEPARTMENT (SIRAN FOREST DIVISION MANSEHRA)

No. 2111-14/GE dated Mansehra the 24<sup>th</sup> 08/2020: In pursuance of Section 8(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the competent authority is pleased to notify/circulate corrected seniority list of Forest Guard BPS-08 in Siran Forest Division Mansehra as it stood on 31.12.2019.

| S.# | Name of Forest Guard   | BPS | Birth     | Domicile   | Qualification | Date of:-                     |                         |                 | Name or No. of Course attended |                     | Parent Division                                | Remarks                                                                 |
|-----|------------------------|-----|-----------|------------|---------------|-------------------------------|-------------------------|-----------------|--------------------------------|---------------------|------------------------------------------------|-------------------------------------------------------------------------|
|     |                        |     |           |            |               | 1st: entry into Govt. service | Appointment/ Adjustment | Selection grado | Regular Course                 | Up-gradation Course |                                                |                                                                         |
| 1.  | Mr. Ishtiaq Ahmad      | 8   | 4-4-1970  | Mansehra   | Matric        | 27-04-1988                    | 27.07.1988              | -               | 25th                           | -do-                | A.T Division                                   | -                                                                       |
| 2.  | Mr. Muhammad Altaf     | 8   | 1-3-1967  | Mansehra   | Matric        | 09-12-1989                    | 09.12.1989              | -               | 30th                           | -do-                | Siran Division                                 | -                                                                       |
| 3.  | Mr. Zafeer Ahmad       | 8   | 1-10-1971 | Mansehra   | BA            | 12-12-1989                    | 12.12.1989              | -               | 28th                           | -do-                | Siran division                                 | -                                                                       |
| 4.  | Mr. Muhammad Tasleem   | 8   | 1-2-1968  | Mansehra   | Matric        | 22-01-1990                    | 28.02.1990              | -               | 34th                           | -do-                | Soka Nullah Project (Defunct)                  | -                                                                       |
| 5.  | Mr. Tahir Ayub         | 8   | 1-6-1970  | Mansehra   | F.A           | 15-07-1990                    | 15.07.1990              | -               | 49th                           | Not attended        | A.T Division                                   | -                                                                       |
| 6.  | Mr. Muhammad Haroon-II | 8   | 20-4-1970 | Abbottabad | Matric        | 18-09-1991                    | 09.09.1996              | -               | 32nd                           | -do-                | Hazara Social Forestry Project (Defunct)       | Adjusted in SFD vide o.o No. 210 dt: 27.12.1997                         |
| 7.  | Mr. Sajjad Ahmad       | 8   | 20-3-1970 | Mansehra   | Matric        | 22-01-1990                    | 19.11.1996              | -               | Trained                        | Attended 6th        | Soka Nullah Project (Defunct)                  | -                                                                       |
| 8.  | Mr. Rustum Khan        | 8   | 15-1-1968 | Mansehra   | Matric        | 09-05-1987                    | 01.07.1997              | -               | 30th                           | -do-                | Intensive Forest Management Project            | -                                                                       |
| 9.  | S. Ejaz Hussain Shah   | 8   | 1-3-1972  | Mansehra   | Matric        | 01-09-1992                    | 13.01.1999              | -               | 34th                           | Attended 9th        | Afforestation Siran Forest Development Project | -                                                                       |
| 10. | Niaz Ahmed Shah        | 8   | 12.2.1965 | Abbottabad | Matric        | 16.04.1985                    | 23.03.1999              | -               | 25th                           | Not attended        | Soka Nullah Project (Defunct)                  | Adjusted in Hazara Tribal Forest Division on 22.03.1999.                |
| 11. | Mr. Muhammad Mushtaq   | 8   | 11-5-1966 | Mansehra   | Matric        | 22-01-1990                    | 01.06.2001              | -               | 31st                           | -do-                | Soka Nullah Project (Defunct)                  | Regularized in SFD from the date of arrival vide o/o No.43 dt: 4.8.2003 |
| 12. | Mr. Muhammad Ilyas     | 8   | 4-4-1971  | Abbottabad | FA            | 14-03-1993                    | 07-10-2005              | -               | 59th                           | Not attended        | Siran Forest Division                          | -                                                                       |
| 13. | Mr. Muhammad Javed     | 8   | 15-5-1977 | Mansehra   | Matric        | 01-07-2004                    | 19.03.2007              | -               | Un-trained                     | -do-                | Siran Forest Division                          | -                                                                       |

Siran Forest Division

Annex - 1

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|    |                        |   |            |          |                |            |            |                          |                          |                       |
|----|------------------------|---|------------|----------|----------------|------------|------------|--------------------------|--------------------------|-----------------------|
| 14 | Mr Muhammad Gulab      | 8 | 1-2-1976   | Mansehra | Matric         | 26-03-2007 | 26-03-2007 | 59                       | Attended 3 <sup>rd</sup> | Siran Forest Division |
| 15 | Mr Muhammad Arshad     | 8 | 1-1-1977   | Mansehra | Matric         | 14-03-2008 | 14-03-2008 | Un-trained               | -do-                     | Siran Forest Division |
| 16 | Mr Muhammad Sidique II | 8 | 17-2-1984  | Mansehra | M.A(Economics) | 14-03-2008 | 14-03-2008 | 73 <sup>rd</sup>         | -do-                     | Siran Forest Division |
| 17 | Mr Asad Iqbal          | 8 | 16-12-1979 | Mansehra | Matric         | 15-03-2008 | 15-03-2008 | 67 <sup>th</sup>         | -do-                     | Siran Forest Division |
| 18 | Mr Muhammad Arsal      | 8 | 15-2-1978  | Mansehra | Matric         | 30-04-2008 | 30-04-2008 | Un-trained               | -do-                     | Siran Forest Division |
| 19 | Shahid Arjum           | 8 | 16-12-1974 | Mansehra | Matric         | 07.03.2009 | 07.03.2009 | -do-                     | -do-                     | Siran Forest Division |
| 20 | Mr Muhammad Ali        | 8 | 8-4-1980   | Mansehra | F A            | 16-07-2009 | 16-07-2009 | 72 <sup>nd</sup>         | -do-                     | Siran Forest Division |
| 21 | Mr Fiaz Iqbal          | 8 | 14-8-1980  | Mansehra | Matric         | 01-08-2009 | 01-08-2009 | 73 <sup>rd</sup>         | -do-                     | Siran Forest Division |
| 22 | Shee Muneza Ali        | 8 | 8-2-1980   | Mansehra | F. Sc          | 12-10-2010 | 12-10-2010 | 72 <sup>nd</sup>         | -do-                     | Siran Forest Division |
| 23 | Shee Ali Benman        | 8 | 01-12-1986 | Mansehra | Matric         | 25.10.2010 | 25.10.2010 | Un-trained               | Not attended             | Siran Forest Division |
| 24 | Mr Muhammad            | 8 | 10-02-1981 | Mansehra | Matric         | 03-5-2011  | 03-5-2011  | Un-trained               | -do-                     | Siran Forest Division |
| 25 | Muhammad               | 8 | 4-8-1983   | Mansehra | F Sc           | 31-12-2013 | 31-12-2013 | Un-trained               | -do-                     | Siran Forest Division |
| 26 | Mr Saad                | 8 | 10-5-1988  | Mansehra | FA             | 17-3-2015  | 17-3-2015  |                          |                          | Siran Forest Division |
| 27 | Mr Saad                | 8 | 20-5-1988  | Mansehra | BA             | 17-3-2015  | 17-3-2015  |                          |                          | Siran Forest Division |
| 28 | Mr Saad                | 8 | 12-9-1988  | Mansehra | BA             | 17-3-2015  | 17-3-2015  |                          |                          | Siran Forest Division |
| 29 | Mr Muhammad Ali        | 8 | 3-10-1988  | Mansehra | MA             | 17-3-2015  | 17-3-2015  | 82 <sup>nd</sup> trained |                          | Siran Forest Division |
| 30 | Mr Saad                | 8 | 24-9-1989  | Mansehra | FA             | 17-3-2015  | 17-3-2015  | Un-trained               |                          | Siran Forest Division |
| 31 | Mr Muhammad            | 8 | 17-2-1990  | Mansehra | BA             | 17-3-2015  | 17-3-2015  |                          |                          | Siran Forest Division |
| 32 | Mr Saad                | 8 | 15-7-1990  | Mansehra | FA             | 17-3-2015  | 17-3-2015  | 79th                     |                          | Siran Forest Division |
| 33 | Mr Muhammad            | 8 | 11-12-1990 | Mansehra | B Com          | 17-3-2015  | 17-3-2015  | 79th                     |                          | Siran Forest Division |
| 34 | Mr Saad                | 8 | 01-2-1991  | Mansehra | FA             | 17-3-2015  | 17-3-2015  |                          |                          | Siran Forest Division |
| 35 | Mr Muhammad            | 8 | 20-4-1991  | Mansehra | B Com          | 17-3-2015  | 17-3-2015  | 82 <sup>nd</sup> trained |                          | Siran Forest Division |
| 36 | Mr Saad                | 8 | 26-8-1991  | Mansehra | F Sc           | 17-3-2015  | 17-3-2015  | trained                  |                          | Siran Forest Division |
| 37 | Mr Muhammad Ali        | 8 | 3-11-1991  | Mansehra | FA             | 17-3-2015  | 17-3-2015  | 81th                     |                          | Siran Forest Division |

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Divisional Officer  
 Siran Forest Division

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(21)

|    |                        |   |            |          |          |            |            |                          |                        |
|----|------------------------|---|------------|----------|----------|------------|------------|--------------------------|------------------------|
| 38 | Hammad Anshad          | 8 | 28.8.1997  | Mansehra | F.Sc     | 17.3.2015  | 17.3.2015  |                          | Siran Forest Division  |
| 39 | Assad-Ul-Rehman        | 8 | 01.3.1993  | Mansehra | D.Com    | 17.3.2015  | 17.3.2015  |                          | Siran Forest Division  |
| 40 | Mah Ul-Islam Khan      | 8 | 15.1.1994  | Mansehra | F.A      | 17.3.2015  | 17.3.2015  | Under training           | Siran Forest Division  |
| 41 | Rana Abdul Hameed      | 8 | 28.7.1996  | Mansehra | F.Sc     | 18.3.2015  | 18.3.2015  |                          | Siran Forest Division  |
| 42 | Muhammad Usman         | 8 | 26.10.1990 | Mansehra | D.Com    | 10.4.2015  | 10.4.2015  |                          | Siran Forest Division  |
| 43 | Tahir Fida             | 8 | 03.02.1991 | Mansehra | F.A      | 10.4.2015  | 10.4.2015  | Under training           | Siran Forest Division  |
| 44 | Rashid Sadiq           | 8 | 15.05.1994 | Mansehra | D.Com    | 10.4.2015  | 10.4.2015  | 79th                     | Siran Forest Division  |
| 45 | Khyzer Hayat           | 8 | 12.6.1995  | Mansehra | F.Sc     | 10.4.2015  | 10.4.2015  | Un-trained               | Siran Forest Division  |
| 46 | Naeem Ahmed            | 8 | 12.11.1986 | Mansehra | F.A      | 01.7.2015  | 01.7.2015  |                          | Siran Forest Division  |
| 47 | Sohaib Ali             | 8 | 06.02.1994 | Mansehra | Bs Honor | 19.10.2016 | 19.10.2016 |                          | Siran Forest Division  |
| 48 | Rehmat Ali             | 8 | 03.08.1989 | Mansehra | B.Com    | 20.10.2016 | 20.10.2016 | 82 <sup>nd</sup> trained | Siran Forest Division  |
| 49 | Siraj Ahmed            | 8 | 12.02.1990 | Mansehra | M.Com    | 20.10.2016 | 20.10.2016 | Un-trained               | Siran Forest Division  |
| 50 | Rana Muhammad Asad     | 8 | 23.11.1992 | Mansehra | F.Sc     | 20.10.2016 | 20.10.2016 |                          | Siran Forest Division  |
| 51 | Waqas Hassan           | 8 | 02.02.1989 | Mansehra | BSC      | 24.10.2016 | 24.10.2016 |                          | Siran Forest Division  |
| 52 | Majid Hussain Shah     | 8 | 09.05.1992 | Mansehra | B.A      | 25.10.2016 | 25.10.2016 |                          | Siran Forest Division  |
| 53 | Waqas Ahmed Khan       | 8 | 01.01.1989 | Mansehra | F.A      | 06.01.2017 | 06.01.2017 |                          | Siran Forest Division  |
| 54 | Syed Snejahat Ali Shah | 8 | 01.03.1990 | Mansehra | B.A      | 16.03.2017 | 16.03.2017 |                          | Siran Forest Division  |
| 55 | Wasqem Anwar           | 8 | 09.02.1990 | Mansehra | B.A      | 19.12.2017 | 19.12.2017 |                          | Siran Forest Division  |
| 56 | Mohammed Shoaib        | 8 | 11.3.1992  | Mansehra | F.Sc     | 19.12.2017 | 19.12.2017 |                          | Siran Forest Division  |
| 57 | Usama Mumtaz           | 8 | 15.2.1995  | Mansehra | D.Com    | 25.01.2018 | 25.01.2018 |                          | Siran Forest Division  |
| 58 | Waqar Farhan           | 8 | 09.04.1993 | Mansehra | F.A      | 08.01.2018 | 08.01.2018 |                          | Kaghan Forest Division |
| 59 | Amir Khan              | 8 | 25.6.1982  | Mansehra | B.A      | 12.11.2018 | 12.11.2018 |                          | Siran Forest Division  |
| 60 | Saad Ali               | 8 | 21.8.1995  | Mansehra | F.Sc     | 12.11.2018 | 12.11.2018 |                          | Siran Forest Division  |
| 61 | Umar Sajjad            | 8 | 03.05.1998 | Mansehra | F.Sc     | 12.11.2018 | 12.11.2018 |                          | Siran Forest Division  |

Divisional Forest Officer  
 Siran Forest Division, Mansehra



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|    |                |   |            |          |      |            |            |                       |
|----|----------------|---|------------|----------|------|------------|------------|-----------------------|
| 62 | Muhammad Sagor | 8 | 14 01 1985 | Manshera | F Sc | 11 01 2019 | 11 01 2019 | Siran Forest Division |
| 63 | Muhammad Sajad | 8 | 14 04 1988 | Manshera | F Sc | 11 01 2019 | 11 01 2019 | Siran Forest Division |
| 64 | Yasir Nawaz    | 8 | 14 08 1990 | Manshera | F Sc | 26 11 2019 | 26 11 2019 | Siran Forest Division |

Divisional Forest Officer  
Siran Forest Division  
*[Signature]*

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Divisional Forest Officer  
Siran Forest Division  
*[Signature]*

GOVERNMENT OF KHYBER PAKHTUNKHWA FORESTRY, ENVIROMNENT AND WILDLIFE DEPARTMENT (SIRAN FOREST DIVISION MANSEHRA)

No. 1917-29 GE dated Mansehra the 13/01/2022: In pursuance of Section 8(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the competent authority is pleased to notify/circulate tentative seniority list of Forest Guard BPS-08 in Siran Forest Division Mansehra as it stood on 31.12.2021.

| S.# | Name of Forest Guard | BPS | Birth     | Domicile   | Qualification | Date of:-                     |                         |                 | Name or No. of Course attended |                     | Parent Division                                | Remarks                                                        |
|-----|----------------------|-----|-----------|------------|---------------|-------------------------------|-------------------------|-----------------|--------------------------------|---------------------|------------------------------------------------|----------------------------------------------------------------|
|     |                      |     |           |            |               | Ist: entry into Govt. service | Appointment/ Adjustment | Selection grade | Regular Course                 | Up-gradation Course |                                                |                                                                |
| 1.  | Mr. Ishtiaq Ahmad    | 8   | 4-4-1970  | Mansehra   | Matric        | 27-04-1988                    | 27.07.1988              | -               | 25th                           | -do-                | A.T Division                                   | -                                                              |
| 2.  | Mr. Muhammad Altaf   | 8   | 1-3-1967  | Mansehra   | Matric        | 09-12-1989                    | 09.12.1989              | -               | 30th                           | -do-                | Siran Division                                 | -                                                              |
| 3.  | Mr. Zafeer Ahmad     | 8   | 1-10-1971 | Mansehra   | BA            | 12-12-1989                    | 12.12.1989              | -               | 28th                           | -do-                | Siran division                                 | -                                                              |
| 4.  | Mr. Muhammad Taseem  | 8   | 1-2-1968  | Mansehra   | Matric        | 22-01-1990                    | 28.02.1990              | -               | 34th                           | -do-                | Soka Nullah Project (Defunct)                  | -                                                              |
| 5.  | Mr. Tahir Ayub       | 8   | 1-6-1970  | Mansehra   | F.A           | 15-07-1990                    | 15.07.1990              | -               | 49th                           | Not attended        | A.T Division                                   | -                                                              |
| 6.  | Mr. Muhammad Haroon  | 8   | 20-4-1970 | Abbottabad | Matric        | 18-09-1991                    | 09.09.1996              | -               | 32nd                           | -do-                | Hazara Social Forestry Project(Defunct)        | Adjusted in SFD vide o.o No. 210 dt: 27.12.1997                |
| 7.  | Mr. Sajjad Ahmad     | 8   | 20-3-1970 | Mansehra   | Matric        | 22-01-1990                    | 19.11.1996              | -               | Trained                        | Attended 6th        | Soka Nullah Project (Defunct)                  | -                                                              |
| 8.  | Mr. Rüstum Khan      | 8   | 15-1-1968 | Mansehra   | Matric        | 09-05-1987                    | 01.07.1997              | -               | 30th                           | -do-                | Intensive Forest Management Project            | -                                                              |
| 9.  | S. Ejaz Hussain Shah | 8   | 1-3-1972  | Mansehra   | Matric        | 01-09-1992                    | 13.01.1999              | -               | 34th                           | Attended 9th        | Afforestation Siran Forest Development Project | -                                                              |
| 10. | Niaz Ahmed Shah      | 8   | 15.2.1965 | Abbottabad | Matric        | 16.04.1985                    | 23.03.1999              | -               | 25th                           | Not attended        | Soka Nullah Project (Defunct)                  | Adjusted in Hazara Tribal Forest Division on 22.03.1999        |
| 11. | Mr. Muhammad Mushlaq | 8   | 11-5-1966 | Mansehra   | Matric        | 22-01-1990                    | 01.06.2001              | -               | 31st                           | -do-                | Soka Nullah Project (Defunct)                  | Regularized in SFD from the date of arrival vide o/o No.43 dt: |

|     |                            |   |            |            |                |            |            |   |                          |                          |                       |   |
|-----|----------------------------|---|------------|------------|----------------|------------|------------|---|--------------------------|--------------------------|-----------------------|---|
| 12. | Mr. Muhammad Ilyas ✓       | 8 | 4-4-1971   | Abbottabad | FA             | 14-03-1993 | 07-10-2005 | - | 59th                     | Not attended             | Siran Forest Division | - |
| 13. | Mr. Muhammad Javed ✓       | 8 | 15-5-1977  | Mansehra   | Matric         | 01-07-2004 | 19.03.2007 | - | Un-trained               | -do-                     | Siran Forest Division | - |
| 14. | Mr. Muhammad Gulab ✓       | 8 | 31-3-1976  | Mansehra   | Matric         | 26-03-2007 | 26-03-2007 | - | 59 <sup>th</sup>         | Attended 3 <sup>rd</sup> | Siran Forest Division | - |
| 15. | Mr. Muhammad Arshad ✓      | 8 | 1-1-1977   | Mansehra   | Matric         | 14-03-2008 | 14-03-2008 | - | Un-trained               | -do-                     | Siran Forest Division | - |
| 16. | Mr. Muhammad Siddique-II ✓ | 8 | 17-2-1984  | Mansehra   | M.A(Economics) | 14-03-2008 | 14-03-2008 | - | 73 <sup>rd</sup>         | -do-                     | Siran Forest Division | - |
| 17. | Mr. Assad Iqbal ✓          | 8 | 16-12-1979 | Mansehra   | Matric         | 15-03-2008 | 15-03-2008 | - | 67 <sup>th</sup>         | -do-                     | Siran Forest Division | - |
| 18. | Mr. Muhammad Arif-II ✓     | 8 | 15-2-1978  | Mansehra   | Matric         | 30-04-2008 | 30-04-2008 | - | Un-trained               | -do-                     | Siran Forest Division | - |
| 19. | Shahzad Anjum ✓            | 8 | 19-12-1974 | Mansehra   | Matric         | 07.03.2009 | 07.03.2009 | - | -do-                     | -do-                     | Siran Forest Division | - |
| 20. | Mr. Muhammad Asif ✓        | 8 | 8-4-1980   | Mansehra   | F.A            | 16-07-2009 | 16-07-2009 | - | 72 <sup>nd</sup>         | -do-                     | Siran Forest Division | - |
| 21. | Mr. Fiaz Zubair ✓          | 8 | 14-3-1980  | Mansehra   | Matric         | 01-08-2009 | 01-08-2009 | - | 73 <sup>rd</sup>         | -do-                     | Siran Forest Division | - |
| 22. | Syed Mujtaba Ali Shah ✓    | 8 | 8-2-1990   | Mansehra   | F. Sc          | 12-10-2010 | 12-10-2010 | - | 72 <sup>nd</sup>         | -do-                     | Siran Forest Division | - |
| 23. | Saqib-ur-Rehman ✓          | 8 | 01-12-1986 | Mansehra   | Matric         | 25.10.2010 | 25.10.2010 | - | Un-trained               | Not attended             | Siran Forest Division | - |
| 24. | Niaz Muhammad ✓            | 8 | 10-02-1981 | Mansehra   | Matric         | 03-5-2011  | 03-5-2011  | - | Un-trained               | -do-                     | Siran Forest Division | - |
| 25. | Waseem Khan ✓              | 8 | 4-8-1993   | Mansehra   | F.Sc           | 31-12-2013 | 31-12-2013 | - | Un-trained               | -do-                     | Siran Forest Division | - |
| 26. | Abdul Saboor ✓             | 8 | 10-5-1986  | Mansehra   | FA             | 17-3-2015  | 17-3-2015  | - | -                        | -                        | Siran Forest Division | - |
| 27. | Khurram Shahzad ✓          | 8 | 20-5-1986  | Mansehra   | BA             | 17-3-2015  | 17-3-2015  | - | -                        | -                        | Siran Forest Division | - |
| 28. | Riasat Ali ✓               | 8 | 12-9-1986  | Mansehra   | BA             | 17-3-2015  | 17-3-2015  | - | -                        | -                        | Siran Forest Division | - |
| 29. | Muhammad Adil ✓            | 8 | 3-10-1988  | Mansehra   | MA             | 17-3-2015  | 17-3-2015  | - | 82 <sup>nd</sup> trained | -                        | Siran Forest Division | - |
| 30. | Rashid Mehmood ✓           | 8 | 24-9-1989  | Mansehra   | FA             | 17-3-2015  | 17-3-2015  | - | Un-trained               | -                        | Siran Forest Division | - |
| 31. | Muhammad Qasim ✓           | 8 | 17-2-1990  | Mansehra   | BA             | 17-3-2015  | 17-3-2015  | - | -                        | -                        | Siran Forest Division | - |
| 32. | Ahmad ✓                    | 8 | 15-7-1990  | Mansehra   | FA             | 17-3-2015  | 17-3-2015  | - | 79th                     | -                        | Siran Forest Division | - |
| 33. | Muhammad Farooq ✓          | 8 | 11-12-1990 | Mansehra   | B.Com          | 17-3-2015  | 17-3-2015  | - | 79th                     | -                        | Siran Forest Division | - |
| 34. | Safdar Hussain Shah ✓      | 8 | 01-2-1991  | Mansehra   | FA             | 17-3-2015  | 17-3-2015  | - | -                        | -                        | Siran Forest Division | - |
| 35. | Muhammad Naseem Khan ✓     | 8 | 20-4-1991  | Mansehra   | B.Com          | 17-3-2015  | 17-3-2015  | - | 82 <sup>nd</sup> trained | -                        | Siran Forest Division | - |

Divisional Forest Officer  
 Siran Forest Division

|     |                        |   |            |          |          |            |            |   |                          |   |                        |   |
|-----|------------------------|---|------------|----------|----------|------------|------------|---|--------------------------|---|------------------------|---|
| 36. | Umer Sharif            | 8 | 26-8-1991  | Mansehra | F. Sc    | 17-3-2015  | 17-3-2015  | - | Trained                  | - | Siran Forest Division  | - |
| 37. | Muhammad Amir          | 8 | 3-11-1991  | Mansehra | FA       | 17-3-2015  | 17-3-2015  | - | 81th                     | - | Siran Forest Division  | - |
| 38. | Assad-Ur-Rehman        | 8 | 01-3-1993  | Mansehra | D.Com    | 17-3-2015  | 17-3-2015  | - | -                        | - | Siran Forest Division  | - |
| 39. | Mati-UI-Islam Khan     | 8 | 15-1-1994  | Mansehra | FA       | 17-3-2015  | 17-3-2015  | - | Under training           | - | Siran Forest Division  | - |
| 40. | Rana Abdul Hameed      | 8 | 28-7-1996  | Mansehra | F. Sc    | 18-3-2015  | 18-3-2015  | - | -                        | - | Siran Forest Division  | - |
| 41. | Muhammad Usman         | 8 | 26.10.1990 | Mansehra | D.Com    | 10.4.2015  | 10.4.2015  | - | -                        | - | Siran Forest Division  | - |
| 42. | Tahir Fida             | 8 | 03.02.1991 | Mansehra | F.A      | 10.4.2015  | 10.4.2015  | - | Under training           | - | Siran Forest Division  | - |
| 43. | Rashid Sadiq           | 8 | 15.05.1994 | Mansehra | D.Com    | 10.4.2015  | 10.4.2015  | - | 79th                     | - | Siran Forest Division  | - |
| 44. | Khyzer Hayat           | 8 | 12.6.1995  | Mansehra | F.Sc     | 10.4.2015  | 10.4.2015  | - | Un-trained               | - | Siran Forest Division  | - |
| 45. | Naeem Ahmed            | 8 | 12.11.1986 | Mansehra | F.A      | 01.7.2015  | 01.7.2015  | - | -                        | - | Siran Forest Division  | - |
| 46. | Sohaib Ali             | 8 | 06.02.1994 | Mansehra | Bs Honor | 19.10.2016 | 19.10.2016 | - | -                        | - | Siran Forest Division  | - |
| 47. | Rehmat Ali             | 8 | 03.08.1989 | Mansehra | B.Com    | 20.10.2016 | 20.10.2016 | - | 82 <sup>nd</sup> trained | - | Siran Forest Division  | - |
| 48. | Siraj Ahmed            | 8 | 12.02.1990 | Mansehra | M.Com    | 20.10.2016 | 20.10.2016 | - | Un-trained               | - | Siran Forest Division  | - |
| 49. | Rana Muhammad Asad     | 8 | 23.11.1992 | Mansehra | F.Sc     | 20.10.2016 | 20.10.2016 | - | -                        | - | Siran Forest Division  | - |
| 50. | Waqas Hassan           | 8 | 02.02.1989 | Mansehra | BSC      | 24.10.2016 | 24.10.2016 | - | -                        | - | Siran Forest Division  | - |
| 51. | Majid Hussain Shah     | 8 | 09.05.1992 | Mansehra | B.A      | 25.10.2016 | 25.10.2016 | - | -                        | - | Siran Forest Division  | - |
| 52. | Waqas Ahmed Khan       | 8 | 01.01.1989 | Mansehra | F.A      | 06.01.2017 | 06.01.2017 | - | -                        | - | Siran Forest Division  | - |
| 53. | Syed Shujahat Ali Shah | 8 | 01.03.1990 | Mansehra | B.A      | 16.03.2017 | 16.03.2017 | - | -                        | - | Siran Forest Division  | - |
| 54. | Waseem Anwar           | 8 | 09.02.1990 | Mansehra | B.A      | 19.12.2017 | 19.12.2017 | - | -                        | - | Siran Forest Division  | - |
| 55. | Mohammad Shoaib        | 8 | 11.3.1992  | Mansehra | F.Sc     | 19.12.2017 | 19.12.2017 | - | -                        | - | Siran Forest Division  | - |
| 56. | Usama Mumtaz           | 8 | 15.2.1995  | Mansehra | D.Com    | 25.01.2018 | 25.01.2018 | - | -                        | - | Siran Forest Division  | - |
| 57. | Waqar Bakht            | 8 | 09.04.1993 | Mansehra | F.A      | 08.01.2018 | 08.01.2018 | - | -                        | - | Kaghan Forest Division | - |
| 58. | Amir Khan              | 8 | 25.6.1982  | Mansehra | B.A      | 12.11.2018 | 12.11.2018 | - | -                        | - | Siran Forest Division  | - |
| 59. | Saad Ali               | 8 | 21.8.1995  | Mansehra | F.Sc     | 12.11.2018 | 12.11.2018 | - | -                        | - | Siran Forest Division  | - |

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|     |                 |   |            |          |      |            |            |   |   |   |                       |   |
|-----|-----------------|---|------------|----------|------|------------|------------|---|---|---|-----------------------|---|
| 60. | Uzair Sajjad    | 8 | 03.06.1998 | Mansehra | F.Sc | 12.11.2018 | 12.11.2018 | - | - | - | Siran Forest Division | - |
| 61. | Muhammad Saqib  | 8 | 14.01.1995 | Mansehra | F.Sc | 11.01.2019 | 11.01.2019 | - | - | - | Siran Forest Division | - |
| 62. | Muhammad Sajjad | 8 | 14.04.1998 | Mansehra | F.Sc | 11.01.2019 | 11.01.2019 | - | - | - | Siran Forest Division | - |
| 63. | Yasir Nawaz     | 8 | 14.08.1999 | Mansehra | F.Sc | 26.11.2019 | 26.11.2019 | - | - | - | Siran Forest Division | - |

Divisional Forest Officer  
Siran Forest Division Mansehra

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Divisional Forest Officer  
Siran Forest Division Mansehra

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GOVERNMENT OF KHYBER PAKHTUNKHWA FORESTRY, ENVIROMNENT AND WILDLIFE DEPARTMENT (SIRAN FOREST DIVISION MANSEHRA)

No. 12550-53/GE dated Mansehra the 21/06/2022: In pursuance of Section 8(1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973, read with Rule-17 Civil Servants (Appointment, Promotion and Transfer) Rules, 1959, the competent authority is pleased to notify/circulate *Final seniority list of Forest Guard BPS-08* in Siran Forest Division Mansehra as it stood on 31.05.2022.

| S.# | Name of Forest Guard | BPS | Birth     | Domicile   | Qualification | Date of                       |                         |                 | Name or No. of Course attended |                          | Parent Division                                | Remarks                                                                 |
|-----|----------------------|-----|-----------|------------|---------------|-------------------------------|-------------------------|-----------------|--------------------------------|--------------------------|------------------------------------------------|-------------------------------------------------------------------------|
|     |                      |     |           |            |               | Ist: entry into Govt. service | Appointment/ Adjustment | Selection grade | Regular Course                 | Up-gradation Course      |                                                |                                                                         |
| 1.  | Mr. Ishtiaq Ahmad    | 8   | 4-4-1970  | Mansehra   | Matric        | 27-04-1988                    | 27.07.1988              | -               | 25th                           | -do-                     | A.T Division                                   | Arrived on merger of Siran and AT Division during 2001                  |
| 2.  | Mr. Muhammad Altaf   | 8   | 1-3-1967  | Mansehra   | Matric        | 09-12-1989                    | 09.12.1989              | -               | 30th                           | -do-                     | Siran Division                                 | -                                                                       |
| 3.  | Mr. Zafeer Ahmad     | 8   | 1-10-1971 | Mansehra   | BA            | 12-12-1989                    | 12.12.1989              | -               | 28th                           | -do-                     | Siran division                                 | -                                                                       |
| 4.  | Mr. Muhammad Tasleem | 8   | 1-2-1968  | Mansehra   | Matric        | 22-01-1990                    | 28.02.1990              | -               | 34th                           | -do-                     | Soka Nullah Project (Defunct)                  | -                                                                       |
| 5.  | Mr. Tahir Ayub       | 8   | 1-6-1970  | Mansehra   | F.A           | 15-07-1990                    | 15.07.1990              | -               | 49th                           | Not attended             | A.T Division                                   | -                                                                       |
| 6.  | Mr. Muhammad Haroon  | 8   | 20-4-1970 | Abbottabad | Matric        | 18-09-1991                    | 09.09.1996              | -               | 32nd                           | -do-                     | Hazara Social Forestry Project (Defunct)       | -                                                                       |
| 7.  | Mr. Sajad Ahmad      | 8   | 20-3-1970 | Mansehra   | Matric        | 22-01-1990                    | 19.11.1996              | -               | Trained                        | Attended 6th             | Soka Nullah Project (Defunct)                  | -                                                                       |
| 8.  | Mr. Rustom Khan      | 8   | 15-1-1968 | Mansehra   | Matric        | 09-05-1987                    | 01.07.1997              | -               | 30th                           | -do-                     | Intensive Forest Management Project            | -                                                                       |
| 9.  | S. Ejaz Hussain Shah | 8   | 1-3-1972  | Mansehra   | Matric        | 01-09-1992                    | 13.01.1999              | -               | 34th                           | Attended 9th             | Afforestation Siran Forest Development Project | -                                                                       |
| 10. | Niaz Ahmed Shah      | 8   | 15.2.1965 | Abbottabad | Matric        | 16.04.1985                    | 23.03.1999              | -               | 25th                           | Not attended             | Soka Nullah Project (Defunct)                  | Adjusted in Hazara Tribal Forest Division on 22.03.1999                 |
| 11. | Mr. Muhammad Mushtaq | 8   | 11-5-1966 | Mansehra   | Matric        | 22-01-1990                    | 01.06.2001              | -               | 31st                           | -do-                     | Soka Nullah Project (Defunct)                  | Regularized in SFD from the date of arrival vide o/o No.43 dt: 4.9.2003 |
| 12. | Mr. Muhammad Ilyas   | 8   | 4-4-1971  | Abbottabad | FA            | 14-03-1993                    | 07-10-2005              | -               | 59th                           | Not attended             | Siran Forest Division                          | -                                                                       |
| 13. | Mr. Muhammad Javed   | 8   | 15-5-1977 | Mansehra   | Matric        | 01-07-2004                    | 19.03.2007              | -               | Un-trained                     | -do-                     | Siran Forest Division                          | -                                                                       |
| 14. | Mr. Muhammad Guwab   | 8   | 3-1-1976  | Mansehra   | Matric        | 26-03-2007                    | 26-03-2007              | -               | 59th                           | Attended 3 <sup>rd</sup> | Siran Forest Division                          | -                                                                       |
| 15. | Mr. Muhammad Arshad  | 8   | 1-1-1977  | Mansehra   | Matric        | 14-03-2008                    | 14-03-2008              | -               | Un-trained                     | -do-                     | Siran Forest Division                          | -                                                                       |

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Divisional Forest Officer  
Siran Forest Division Mansehra

|     |                       |   |            |          |                 |            |            |   |                          |              |                       |                                                                                                                  |
|-----|-----------------------|---|------------|----------|-----------------|------------|------------|---|--------------------------|--------------|-----------------------|------------------------------------------------------------------------------------------------------------------|
| 16. | Mr. Muhammad Siddique | S | 17-2-1984  | Mansehra | M.A(Economic s) | 14-03-2008 | 14-03-2008 | - | 73 <sup>rd</sup>         | -do-         | Siran Forest Division | -                                                                                                                |
| 17. | Mr. Assad Iqbal       | S | 16-12-1979 | Mansehra | Matric          | 15-03-2008 | 15-03-2008 | - | 67 <sup>th</sup>         | -do-         | Siran Forest Division | -                                                                                                                |
| 18. | Mr. Muhammad Arif-II  | S | 15-2-1978  | Mansehra | Matric          | 30-04-2008 | 30-04-2008 | - | Un-trained               | -do-         | Siran Forest Division | -                                                                                                                |
| 19. | Shahzad Anjum         | S | 19-12-1974 | Mansehra | Matric          | 07.03.2009 | 07.03.2009 | - | -do-                     | -do-         | Siran Forest Division | -                                                                                                                |
| 20. | Mr. Muhammad Asif     | S | 8-4-1980   | Mansehra | F.A             | 16-07-2009 | 16-07-2009 | - | 72 <sup>nd</sup>         | -do-         | Siran Forest Division | -                                                                                                                |
| 21. | Mr. Fiaz Zubeir       | S | 14-3-1980  | Mansehra | Matric          | 01-08-2009 | 01-08-2009 | - | 73 <sup>rd</sup>         | -do-         | Siran Forest Division | -                                                                                                                |
| 22. | Syed Mujtaba Ali Shah | S | 8-2-1990   | Mansehra | F. Sc           | 12-10-2010 | 12-10-2010 | - | 72 <sup>nd</sup>         | -do-         | Siran Forest Division | -                                                                                                                |
| 23. | Sayidur-Rahman        | S | 01-12-1986 | Mansehra | Matric          | 25.10.2010 | 25.10.2010 | - | 72 <sup>nd</sup> Trained | Not attended | Siran Forest Division | -                                                                                                                |
| 24. | Nasir Muhammad        | S | 10-02-1981 | Mansehra | Matric          | 03-5-2011  | 03-5-2011  | - | Un-trained               | -do-         | Siran Forest Division | Struck off from KPK Forest School due to failed in 1 <sup>st</sup> term examination of 82 <sup>nd</sup> F/Course |
| 25. | Waseem Khan           | S | 4-8-1993   | Mansehra | F.Sc            | 31-12-2013 | 31-12-2013 | - | 75 <sup>th</sup> trained | -do-         | Siran Forest Division | -                                                                                                                |
| 26. | Abdul Saboor          | S | 10-5-1985  | Mansehra | FA              | 17-3-2015  | 17-3-2015  | - | 83 <sup>rd</sup> trained | -            | Siran Forest Division | -                                                                                                                |
| 27. | Kurram Shahzad        | S | 20-5-1985  | Mansehra | BA              | 17-3-2015  | 17-3-2015  | - | 84 <sup>th</sup> Trained | -            | Siran Forest Division | -                                                                                                                |
| 28. | Raza Ali              | S | 12-9-1985  | Mansehra | BA              | 17-3-2015  | 17-3-2015  | - | Un-trained               | -            | Siran Forest Division | -                                                                                                                |
| 29. | Rashid Mahmood        | S | 24-9-1989  | Mansehra | FA              | 17-3-2015  | 17-3-2015  | - | Un-trained               | -            | Siran Forest Division | -                                                                                                                |
| 30. | Muhammad Qasim        | S | 17-2-1990  | Mansehra | BA              | 17-3-2015  | 17-3-2015  | - | Un-trained               | -            | Siran Forest Division | -                                                                                                                |
| 31. | Ahmad                 | S | 15-7-1990  | Mansehra | FA              | 17-3-2015  | 17-3-2015  | - | 79 <sup>th</sup>         | -            | Siran Forest Division | -                                                                                                                |
| 32. | Munazzat Farooq       | S | 11-12-1990 | Mansehra | B.Com           | 17-3-2015  | 17-3-2015  | - | 79 <sup>th</sup>         | -            | Siran Forest Division | -                                                                                                                |
| 33. | Sabir Hussain Shah    | S | 01-2-1991  | Mansehra | FA              | 17-3-2015  | 17-3-2015  | - | Un-trained               | -            | Siran Forest Division | -                                                                                                                |
| 34. | Muhammad Waseem Khan  | S | 26-4-1991  | Mansehra | B.Com           | 17-3-2015  | 17-3-2015  | - | 82 <sup>nd</sup> trained | -            | Siran Forest Division | -                                                                                                                |
| 35. | Umer Shahid           | S | 26-8-1991  | Mansehra | F. Sc           | 17-3-2015  | 17-3-2015  | - | 78 <sup>th</sup> Trained | -            | Siran Forest Division | -                                                                                                                |
| 36. | Munazzat Aqir         | S | 3-11-1991  | Mansehra | FA              | 17-3-2015  | 17-3-2015  | - | 81 <sup>th</sup>         | -            | Siran Forest Division | -                                                                                                                |

ATTESTED

Divisional Forest Officer  
Siran Forest Division, Mansehra

|     |                        |   |            |          |          |            |            |   |                          |   |                        |   |
|-----|------------------------|---|------------|----------|----------|------------|------------|---|--------------------------|---|------------------------|---|
| 37. | Assad-Ur-Rehman        | 8 | 01-3-1993  | Mansehra | D.Com    | 17-3-2015  | 17-3-2015  | - | Un-trained               | - | Siran Forest Division  | - |
| 38. | Maq-Ul-Islam Khan      | 8 | 15-1-1994  | Mansehra | FA       | 17-3-2015  | 17-3-2015  | - | 80 <sup>th</sup> trained | - | Siran Forest Division  | - |
| 39. | Rana Abdul Hameed      | 8 | 28-7-1996  | Mansehra | F. Sc    | 18-3-2015  | 18-3-2015  | - | 83 <sup>th</sup> trained | - | Siran Forest Division  | - |
| 40. | Muhammad Usman         | 8 | 26.10.1990 | Mansehra | D.Com    | 10.4.2015  | 10.4.2015  | - | Un-trained               | - | Siran Forest Division  | - |
| 41. | Tahir Fida             | 8 | 03.02.1991 | Mansehra | F.A      | 10.4.2015  | 10.4.2015  | - | 80 <sup>th</sup> trained | - | Siran Forest Division  | - |
| 42. | Rashid Saadiq          | 8 | 15.05.1994 | Mansehra | D.Com    | 10.4.2015  | 10.4.2015  | - | 79 <sup>th</sup> trained | - | Siran Forest Division  | - |
| 43. | Khyzer Hayat           | 8 | 12.6.1995  | Mansehra | F.Sc     | 10.4.2015  | 10.4.2015  | - | Un-trained               | - | Siran Forest Division  | - |
| 44. | Naseem Ahmed           | 8 | 12.11.1986 | Mansehra | F.A      | 01.7.2015  | 01.7.2015  | - | Un-trained               | - | Siran Forest Division  | - |
| 45. | Sohab A5               | 8 | 06.02.1994 | Mansehra | Bs Honor | 19.10.2016 | 19.10.2016 | - | Un-trained               | - | Siran Forest Division  | - |
| 46. | Rehmat A5              | 8 | 03.08.1989 | Mansehra | B.Com    | 20.10.2016 | 20.10.2016 | - | 82 <sup>nd</sup> trained | - | Siran Forest Division  | - |
| 47. | Siraj Ahmed            | 8 | 12.02.1990 | Mansehra | M.Com    | 20.10.2016 | 20.10.2016 | - | Un-trained               | - | Siran Forest Division  | - |
| 48. | Rana Muhammad Asad     | 8 | 23.11.1992 | Mansehra | F.Sc     | 20.10.2016 | 20.10.2016 | - | Un-trained               | - | Siran Forest Division  | - |
| 49. | Waqas Hassan           | 8 | 02.02.1989 | Mansehra | BSC      | 24.10.2016 | 24.10.2016 | - | Un-trained               | - | Siran Forest Division  | - |
| 50. | Majid Hussain Shah     | 8 | 09.05.1992 | Mansehra | B.A      | 25.10.2016 | 25.10.2016 | - | Un-trained               | - | Siran Forest Division  | - |
| 51. | Waqas Ahmed Khan       | 8 | 01.01.1989 | Mansehra | F.A      | 06.01.2017 | 06.01.2017 | - | Un-trained               | - | Siran Forest Division  | - |
| 52. | Syed Shujahat Ali Shah | 8 | 01.03.1990 | Mansehra | B.A      | 16.03.2017 | 16.03.2017 | - | Un-trained               | - | Siran Forest Division  | - |
| 53. | Waseem Anwar           | 8 | 09.02.1990 | Mansehra | B.A      | 19.12.2017 | 19.12.2017 | - | Un-trained               | - | Siran Forest Division  | - |
| 54. | Mohammad Shoaib        | 8 | 11.3.1992  | Mansehra | F.Sc     | 19.12.2017 | 19.12.2017 | - | Un-trained               | - | Siran Forest Division  | - |
| 55. | Usama Mumtaz           | 8 | 15.2.1995  | Mansehra | D.Com    | 25.01.2018 | 25.01.2018 | - | Un-trained               | - | Siran Forest Division  | - |
| 56. | Waqar Bakht            | 8 | 09.04.1993 | Mansehra | F.A      | 08.01.2018 | 08.01.2018 | - | Un-trained               | - | Kaghan Forest Division | - |
| 57. | Amir Khan              | 8 | 25.6.1982  | Mansehra | B.A      | 12.11.2018 | 12.11.2018 | - | Un-trained               | - | Siran Forest Division  | - |
| 58. | Saad Ali               | 8 | 21.8.1995  | Mansehra | F.Sc     | 12.11.2018 | 12.11.2018 | - | Un-trained               | - | Siran Forest Division  | - |

Siran Forest Division, Mansehra  
 Divisional Office  
 Mansehra



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|     |                 |   |            |          |      |            |            |   |            |   |                       |   |
|-----|-----------------|---|------------|----------|------|------------|------------|---|------------|---|-----------------------|---|
| 59. | Uzair Sajjad    | 8 | 03.06.1998 | Mansehra | F.Sc | 12.11.2018 | 12.11.2018 | - | Un-trained | - | Siran Forest Division | - |
| 60. | Muhammad Saqib  | 8 | 14.01.1995 | Mansehra | F.Sc | 11.01.2019 | 11.01.2019 | - | Un-trained | - | Siran Forest Division | - |
| 61. | Muhammad Sajjad | 8 | 14.04.1998 | Mansehra | F.Sc | 11.01.2019 | 11.01.2019 | - | Un-trained | - | Siran Forest Division | - |
| 62. | Yasir Nawaz     | 8 | 14.08.1999 | Mansehra | F.Sc | 26.11.2019 | 26.11.2019 | - | Un-trained | - | Siran Forest Division | - |
| 63. | Shehzad Ahmed   | 8 | 15.03.1996 | Mansehra | BA   | 10.09.2021 | 10.09.2021 | - | Un-trained | - | Siran Forest Division | - |
| 64. | Hamza Masood    | 8 | 01.01.1996 | Mansehra | DAE  | 10.09.2021 | 10.09.2021 | - | Un-trained | - | Siran Forest Division | - |
| 65. | Ibrar Ahmed     | 8 | 22.10.1995 | Mansehra |      | 20.05.2022 | 20.05.2022 | - | Un-trained | - | Siran Forest Division | - |
| 66. | Hasnain Arshad  | 8 | 03.03.2003 | Mansehra | F.Sc | 31.05.2022 | 31.05.2022 | - | Un-trained | - | Siran Forest Division | - |
| 67. | Shair Ali Khan  | 8 | 10.06.1999 | Mansehra | DAE  | 31.05.2022 | 31.05.2022 | - | Un-trained | - | Siran Forest Division | - |

Certified that the tentative seniority list of Forest Guards in Siran Forest Division Mansehra as it stood on 31/12/2021 was circulated vide this office letter No. 6917-20/GE, dated 13/01/2022. None of the Forest Guard has so far raised any observation, therefore, final seniority list has been circulated.

Divisional Forest Officer,  
Siran Forest Division Mansehra

ATTESTED

Divisional Forest Officer,  
Siran Forest Division Mansehra

Annex-4 06

**OFFICE ORDER NO. 32 DATED MANSEHRA THE 19/08/2022, ISSUED BY  
MUDDASIR HASSAN DIVISIONAL FOREST OFFICER, SIRAN FOREST DIVISION  
MANSEHRA**

On the recommendation of Departmental Promotion Committee meeting held on 04-08-2022 in the office of undersigned the following Forest Guards (BPS-8) of Siran Forest Division are hereby promoted to the rank of Forester in BPS-10 (18050-1190-53750) against the existing vacancies with immediate effect.

- |                           |                            |
|---------------------------|----------------------------|
| 1. Mr. Ishtiaq Ahmad      | 2. Muhammad Altaf          |
| 3. Mr. Zafeer Ahmad       | 4. Muhammad Tasleem        |
| 5. Mr. Tahir Ayub         | 6. Muhammad Haroon         |
| 7. Mr. Sajjad Ahmad       | 8. Mr. Rustum Khan         |
| 9. Syed Ejaz Hussain Shah | 10. Mr. Niaz Ahmed Shah    |
| 11. Muhammad Mushtaq      | 12. Sardar Muhammad Illyas |
| 13. Muhammad Gulab        | 14. Muhammad Siddique      |


1. This order is purely temporary and will not confer any right for continuity in case of abolition of the posts. In such an eventuality they will automatically stand reverted to original posts without assigning any reasons. Moreover they will be bound to join their new place of posting. In case of non compliance, their promotion orders will be withdrawn.
2. They will remain on probation for a period of one year in terms of section-6(2) of the Khyber Pakhtunkhwa Civil Servant Act 1973 read with rules- 15 (I) of the Khyber Pakhtunkhwa Civil Servant (Appointment, promotion and transfer) rules- 1989.
3. M/S Muhammad Altaf, Muhammad Tasleem, Muhammad Haroon, Rustum Khan at serial No. 2, 4, 6 & 8 FIRs have been lodged against them in Anti-Corruption Circle Mansehra which are under trial and officials M/S Muhammad Haroon and Rustum Khan at serial No: 6 & 8 against disciplinary proceedings are under process with enquiry committee, if their cases will be decided against them they will be reverted back to their original posts as Forest Guard.

**Sd/- (Muddasir Hassan)**  
Divisional Forest Officer  
Siran Forest Division Mansehra

Copy forwarded to the:-

1. The Chief Conservator of Forests Northern Forest Region-II Abbottabad.
2. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad.
3. Section Officer (Establishment) Forestry Environment & Wildlife Department Peshawar.
4. Divisional Wildlife Officer, Mansehra Wildlife Division, Mansehra.
5. All SDFO/RFO for information and necessary action.
6. Officials concerned.

  
Divisional Forest Officer  
Siran Forest Division Mansehra

**ATTESTED!**  
  
Divisional Forest Officer  
Siran Forest Division Mansehra

**INDIA SERVICE TRIBUNAL PESHAWAR**  
**Service Appeal No. 4826 of 2021**

Tahir Ayub, Forest Guard, Lower Siran Forest Sub-Division Shinklari, Mansehra

Appellant

**Versus**

1. The Conservator of Forests, Lower Hazara Forest Circle Abbottabad
2. The Divisional Forest Officer, Siran Forest Division, Mansehra
3. Muhammad Nazir Forester, Siran Forest Division, Mansehra
4. Muhammad Alam Forester, Siran Forest Division, Mansehra
5. Ali Ahmad Forester, Siran Forest Division, Mansehra
6. Muhammad Siddique Forester, Siran Forest Division, Mansehra
7. Ahmad Nawaz Forester, Siran Forest Division, Mansehra
8. Muhammad Naseem Forester, Siran Forest Division, Mansehra
9. Muhammad Shabir Forester, Siran Forest Division, Mansehra
10. Muhammad Riaz Forester, Siran Forest Division, Mansehra
11. Muhammad Pervaiz Forester, Siran Forest Division, Mansehra

Respondents

**COMMENTS ON BEHALF OF RESPONDENTS**

1604

**RESPECTFULLY SHEWETH**

**PRELIMINARY OBJECTIONS**

- i. The appellant has no cause of action and locus standi to file the present appeal.
- ii. That the appeal is bad for non joinder of necessary parties and mis joinder of unnecessary parties.
- iii. That the appellant has been estopped by his own conduct to file the appeal.
- iv. That the appeal is against the Law/Procedure and not maintainable in its present form.
- v. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
- vi. That the appellant has not come to this honorable service tribunal with clean hands and suppressed the real facts from this Honorable Tribunal.
- vii. That the competent authority has passed the order after fulfillment of all the codal formalities. Hence the appeal is liable to be dismissed without any further proceedings.
- viii. That the appeal is barred by law and Limitation.

1. It is correct. That the Petitioner has filed the service appeal inadvertently against the tentative seniority list of forest guard dated 31.12.2019 and corrected seniority list dated 31.12.2021 as such to seniority list of 31.12.2019 was circulated to all effective strength of forest guards but after lapse of one month no omission / discrepancies received from all forest guards including petitioner. The final seniority list dated 31.05.2022 was circulated to all effective strength of forest guards including petitioner and On the base of same seniority all senior most forest guards including petitioner promoted to the rank of forester against the existing posts vide DFO Siran office order No: 32 dated 19.08.2022(copy enclosed as Annexure-1, 2, 3 & 4).
2. It is correct. The service appeal heard in Service Tribunal Peshawar and comments reply filed by the respondents, the petitioner admitted that service appeal was not prepared properly accordingly to the fact of the case and also requested for correction of seniority list. The seniority list corrected by the respondent No: 2 which was circulated dated 31.12.2021 and subsequently final seniority list was circulated dated 31.05.2022. On the basis of that seniority the petitioner was promoted to the rank of Forester as mentioned in para-1(Annexure-2 & 3)
3. Incorrect. Upon the corrected seniority list the petitioner resultantly promoted to the rank of Forester(BPS-10) vide DFO Siran office order 32 dated 19.08.2022. The seniority of Forester to be maintain by respondent No: 1 the petitioner needs to prayer of any issue i-e: seniority and top of that consequential benefit before respondent No:1.
4. It is incorrect. The consequential benefit so far relates to the petitioner has already been granted as explained in para-3.
5. Pertains to court. Needs no comments.

It is therefore, humbly prayed that the subject appeal being baseless, illegal and against the law may kindly be dismissed, please.

Conservator of Forests  
Lower Hazara Forest Circle Abbottabad  
(Respondent No. 01)

*Vetted  
subject to correction  
answered all questions  
documents submitted  
under and original  
affidavit.*

Divisional Forest Officer  
Siran Forest Division  
Mansehra  
(Respondent No. 02)

*Submitted for vetting please. [Signature]*

*31/10 [Signature]*

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

Service Appeal NO: 4826/2021

Tahir Ayub Forest Guard Lower Siran Forest Division Shinkiyari, Mansehra

(Appellant)

VERSUS

The Conservator of Forests, Lower Hazara Forest Circle Abbottabad and others

(Respondents)

**SERVICE APPEAL**

**REPLY ON BEHALF OF RESPONDENTS 3, 4, 6, 11**

**INDEX**

| <b>S.No</b> | <b>Description of Documents</b>    | <b>Annex</b> | <b>Pages</b> |
|-------------|------------------------------------|--------------|--------------|
| <b>1.</b>   | <b>Reply on Application</b>        |              | <b>1-4</b>   |
| <b>2.</b>   | <b>Copy of Lists</b>               | <b>A</b>     | <b>5-28</b>  |
| <b>3.</b>   | <b>Copy of Appeal and Comments</b> | <b>B</b>     | <b>29-42</b> |
| <b>4.</b>   | <b>Copy of Promotion Order</b>     | <b>C</b>     | <b>43</b>    |
| <b>5.</b>   | <b>Copy of Service Book</b>        | <b>D</b>     | <b>44-45</b> |

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

**Service Appeal NO: 4826/2021**

Tahir Ayub Forest Guard Lower Siran Forest Division Shinkiyari, Mansehra

**(Appellant)**

**VERSUS**

The Conservator of Forests, Lower Hazara Forest Circle Abbottabad and others

**(Respondents)**

**SERVICE APPEAL**

**REPLY TO APPLICATION ON BEHALF OF 3,4,6 AND 11**

**RESPECTFULLY SHEWETH**

**PRELIMINARY OBJECTIONS**

1. The appellant/petitioner has got no cause of action and locus standi.
2. That the application is bad for non-joinder of necessary parties and mis-joinder of unnecessary parties.
3. That the appellant/petitioner has been estopped by his own conduct to file the application.
4. That the application is against the law and procedure and is not maintainable in the present form.
5. That the Honourable Tribunal has no jurisdiction to entertain the application.

6. That the application of the appellant comes under the ambit of concealment of facts, therefore not maintainable.
7. That the appellant/petitioner has already been promoted vide Office Order No. 32 Dated 19.08.2022 from Forest Guard BPS-8 to Forester BPS-19, hence the present as well as the application of the appellant/petitioner is not maintainable and therefore infructuous.
8. That after promotion order of the appellant/petitioner, one of the aggrieved persons Mr. Sajjad Ahmad filed an appeal vide appeal no. 283/2021 that is pending adjudication before the Honorable Tribunal.
9. That if the instant application filed by the appellant/petitioner is accepted, it will change the nature of appeal and cause of action which is not maintainable in the eye of law.
10. That the application of the appellant/petitioner is barred by law.
11. That through this instant application and the appeal the service rights of the respondents were held in peril and the respondents were unnecessarily harassed with the litigation process.
12. That due to this appeal and court order, the respondents were not considered for any service promotions and benefits which is detrimental to the fundamental and service rights of respondents.

### **FACTUAL OBJECTIONS**

1. That the para No.1 is incorrect, in reply the appeal of the appellant/petitioner is premature on grounds that the impugned seniority list was not finalized, therefore the appeal is not maintainable. That the appellant/petitioner did not challenge the previous seniority lists as issued by the department/respondents on different dates including (i) 31.11.2014, (ii) 31.03.2015, (iii) 31.01.2017, (iv) 31.01.2018, (v) 31.12.2019, (vi) 31.12.2020,

(vii) 31.12.2021, (viii) 31.05.2022 as according to these lists the appellant on completion of the term was also promoted. Furthermore, the appellant/petitioner unnecessarily involved the respondents in the instant petition which is clearly in violation of law and service rules.

(Copy of Lists is Annexed as "ANNEXURE A")

2. That the para No. 2 is incorrect, in reply that the appeal filed by the petitioner/appellant is premature, against the law, against the service rules and not maintainable. That the instant application is not in proper form and accordingly if Honourable Tribunal allows this petition, the nature and form of petition of the appeal as well as relief will be changed that is not allowed in the eye of law.

3. That the para No. 3 is incorrect, in reply, after completion of term, the department promoted vide Office Order No. 32 Dated 19.08.2022 the appellant/petitioner along with others. The seniority list Dated 31.12.2019 as already been challenged by one of the petitioners namely Sajjad Ahmad vide appeal No. 283/2021 which is pending adjudication before before the Honourable Service Tribunal. Furthermore, the matter which is already been sub-judice, then how the same matter can be decided which has not attained finality yet.

(Copy of Appeal and Comments along with Promotion Order and Service Book is annexed as "ANNEXURE B, C, D")

4. That the para No. 4 is incorrect, in reply, the promotion and seniority list has already been challenged before the Honourable Tribunal as mentioned in para No. 3, the matter is sub judice, therefore application of appellant/petitioner is liable to be dismissed and the appellant/petitioner is not entitled to any relief.

5. That the para No. 5 is incorrect, in reply it is stated that the appeal along with the application of the appellant/petitioner is not maintainable in the eyes of law therefore petitioner/appellant is not entitled for any relief or consequential relief.

6. That any other contention shall be raised by the counsel at the time of arguments with the permission of the Honourable Tribunal.



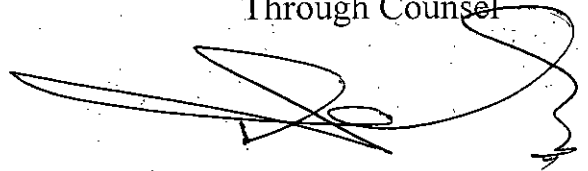
**PRAYER**

It is therefore humbly prayed that the application of petitioner/appellant may graciously be dismissed with heavy costs.

**RESPONDENTS NO 3, 4, 6, 11**

Ahmad Nawaz etc

Through Counsel



**Tanweer Ahmad Din**

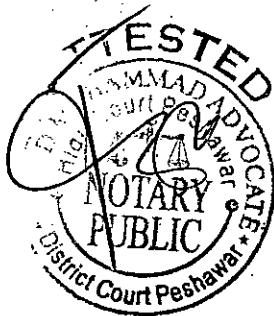
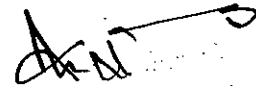
**Advocate High Court**

**Office District Courts Mansehra**

**AFFIDAVIT:**

I Ahmad Nawaz S/O Abdul Aziz Khan R/O Banda Geasuch, Tehsil and District Mansehra, do hereby solemnly affirms and declared on oath that the content of the above application are true and correct to the best of my knowledge and belief. And nothing has been concealed from this Honorable court.

Deponent



# ANNEXURE 'A'

|                                                                                                                   |                                                                                    |                                                 |
|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------|
| <b>MUDDASIR HASSAN</b><br>DIVISIONAL FOREST OFFICER<br>SIRAN FOREST DIVISION MANSEHRA<br>Ph. & Fax #. 0997-920140 |  | NO. <u>3674</u> /GE<br>Dated <u>26</u> /10/2022 |
|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------|

5

Mr. Muhammad Shabir Forester  
c/o SDFO Upper Siran Forest Sub-Division

Subject: **PROVISION OF INFORMATION**

Memo: Reference your application dated 14.10.2022

As requested by you vide your application cited under reference, the following documents are enclosed herewith for information and further necessary action.

1. Seniority list of Forest Guard w.e.f 30.11.2014 and onward.
2. Copy of Service book of Mr. Tahir Ayub Forester
3. Service appeal No: 2&3 filed by Sajjad Ahmad & Mushtaq the then Forest Guard
4. Departmental reply of service appeal No: 2&3 filed by Sajjad Ahmad & Mushtaq the then Forest Guard

**Encl: As Above**

Divisional Forest Officer  
Siran Forest Division Mansehra