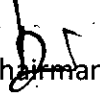


27.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Senior Research Officer (BPS-18) and was placed at Serial No. 20 of the seniority list as it stood on 1.6.2013 which position of the appellant was disturbed in the impugned seniority list dated 1.7.2014 and appellant placed at Serial No. 25 instead of Serial No. 20 regarding which he preferred departmental appeal which was rejected on 21.4.2015 and hence the instant service appeal on 20.5.2015.

That the position of the appellant is to be retained at Serial No. 20 and the impugned reduction to Serial No. 25 is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 13.10.2015 before S.B.


Chairman

13.10.2015

Agent of counsel for the appellant and Mr. Barkat Khan, Senior Research Officer alongwith Addl: A.G for official respondents No. 1 to 3 present. Requested for adjournment. To come up for written reply/comments on 21.12.2015 before S.B.


Chairman

21.12.2015

Appellant in person and Mr. Barkat Khan, Senior Research Officer alongwith Addl: A.G for official respondents present. Submitted application for withdrawal of appeal which is affirmed by the appellant before the Court.

Dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
21.12.2015


Chairman

21.12.15




Appellant Deposited
Process Fee
Sec.



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 627/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	11.06.2015	<p>The appeal of Mr. Dr. Hamid Ullah Khan resubmitted today by Mr. Bilal Ahmad Kakaizai Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	23-6-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>23-6-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	23.06.2015	<p>None present for appellant. Notice be issued to counsel for the appellant for 27.7.2015 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

To

The Chairman
Service Tribunal KPK
Peshawar

Subject: Withdrawal of Appeal No. 627/2015

Sir,

Refer to the above cited subject,

It is please stated that I Dr. Hamidullah Khan
(Senior Rank Officer) is hereby with ~~my~~^{draw} my
Service appeal No. 627/2015 titled
Dr. Hamidullah Khan Vs Govt of KPK etc.

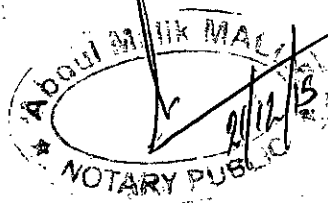
Kindly my request/application may
be entertained, please.

Dated: 21/12/2015

H. Khan

Dr. Hamidullah Khan
Appellant

ATTESTED




The appeal of Dr. Hamidullah Khan Senior Reseach Officer received to-day i.e. on 20.05.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Addresses of respondent no. 4 to 9 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 769 /S.T,

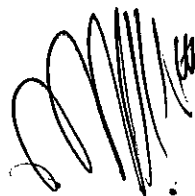
Dt. 21/5 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bilal A Kakaizai Adv. Pesh.

Resubmitted as per objections.

Please put before Tribunal.



BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. 627 / 2015.

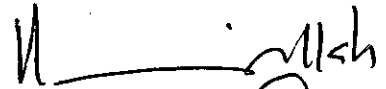
Dr. Hamid Ullah Khan

VS


Government of KPK etc

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Wakalat Nama		


Appellant

Through,


BILAL AHMAD KAKAIZAI
(Advocate, Peshawar)

213, SUNEHRI MASJID ROAD,
PESHAWAR CANTT.

0300-9020098

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

Service Appeal No. 627/2014.

**K.W.P. Province
Service Tribunal**

Diary No. 515

Dated 20-5-2015

Dr. HAMID ULLAH KHAN,
Senior Research Officer, Media & Sterilization Section, Veterinary Research
Institute, Peshawar.

..... Appellant

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHWA,
Through Chief Secretary, Civil Secretariat, Peshawar.
2. SECRETARY,
Agriculture, Livestock, Cooperative and Fisheries Department,
Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. DIRECTOR GENERAL RESEARCH,
Livestock & Dairy Development Department, Bacha Khan Chowk,
Peshawar.
4. Dr. Imtiaz Ali Shah, Senior Research Officer, Livestock Research &
Development Station, Surezai, Peshawar.
5. Dr. Muhammad Ilyas Khan, Senior Research Officer, Livestock Research &
Development Station, Surezai, Peshawar.
6. Dr. Anwar Ali, Senior Research Officer, Directorate General Research,
Livestock & dairy Development, Veterinary Research Institute, Bacha Khan
Chowk, Peshawar.
7. Dr. Jehangir Ali, Senior Research Officer, Directorate of Livestock,
Research and Development, Bacha Khan Chowk, Peshawar.
8. Dr. Safirullah, Senior Research Officer, Senior Research Officer,
Directorate General Research, Livestock & dairy Development, Veterinary
Research Institute, Bacha Khan Chowk, Peshawar.
9. Dr. Tariq Ali, Senior Research Officer, Livestock Research & Development
Institute, D.I.Khan.

..... Respondents

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST IMPUGNED SENIORITY LIST OF SENIOR RESEARCH
OFFICERS (BPS-18) WHEREBY THE PRIVATE RESPONDENTS NO. 4 TO 9**

re-submitted to-day
and filed.

Registrar

Filed to-day
20/6/15

20/6/15

HAVE BEEN SHOWN ABOVE THE NAME OF THE APPELLANT AND AGAINST
IMPUGNED APPELLATE ORDER NO. DG(RES)L&DD.EST.I
(10)/2012/VOL.III/17787 DATED 21.04.2015 WHEREBY THE
DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED /
DISMISSED.

Prayer: On Acceptance of this Appeal the Impugned Appellate Order be set aside being against the law and rules moreover the Impugned Seniority List may please be corrected and Appellant be placed at Serial No. 18 i.e. above the name of the Respondents No. 4 to 9, with such other relief as may deem fit in the circumstances of the case may also be granted.

Respectfully Sheweth,

Short facts giving rise to the present Service Appeal, are as under:

1. That, Appellant being a Research Officer (BPS-17), applied for the post of Senior Research Officer (BPS-18), through proper channel i.e. Public Service Commission, copy of the Advertisement is attached as Annexure A.
2. That, Public Service Commission vide Letter dated 15.09.2011 recommended the Appellant for the post of Senior Research Officer (BPS-18), in consequence whereof appellant was asked to furnish the Medical Certificates etc, copy of the Recommendation and Medical Certificates etc are attached as Annexure B.
3. That, in pursuance of report of the Standing Medical Board, the proposal for the adjustment of newly recommendees / appointees of Commission was issued by the Respondent No. 3, for the purpose of issuance of formal appointment order; copy of the Proposal is attached as Annexure C.
4. That, feeling aggrieved by the recommendation etc of the Appellant, one Dr. Tariq Ali i.e. Respondent No. 9 approached the Honourable Peshawar High Court, Peshawar and obtained an Interim order dated 17.11.2011 whereby the Department was restrained from issuance of Appointment Orders in respect of recommendees of the Public Service

Commission including the Appellant, copy of the Order dated 17.11.2011 is attached as Annexure D.

5. That, during the pendency of Writ Petition, the Respondents No. 4 to 9 were promoted, under the 75% quota reserved for promotion, to the post of Senior Research Officer (BPS-18), hence the Writ Petition was disposed-off being infructuous vide Order dated 16.01.2013, copy of the Promotion Order of the Respondents No. 4 to 9 dated 28.11.2012 and Order / Judgment dated 16.01.2013 of Peshawar High Court, Peshawar in Writ Petition No. 2475 / 2011 is attached as Annexure E & F.
6. That, after lifting of the bar contained in the Interim Order dated 17.11.2011, the Appointment Order of the Appellant in (BPS-18) was issued, copy of the Order dated 21.02.2013 is attached as Annexure G.
7. That, thereafter Seniority List as stood on 01.06.2013 was issued whereby the Appellant was assigned the seniority as per the date of the recommendation of the Public Service Commission, copy of the Seniority List and Order dated 24.06.2013 is attached as Annexure H & I.
8. That, another Seniority List was circulated whereby the earlier seniority position of the Appellant was reversed and he was placed at Serial No. 25 instead of Serial No. 18, copy of the Impugned List is attached as Annexure K.
9. That, feeling aggrieved from the Impugned Seniority List, Appellant preferred his Departmental Appeal which was rejected vide Order dated 21.04.2015, copy of the Departmental Appeal & Impugned Appellate Order is attached as Annexure L & M. hence this Service Appeal on following amongst other grounds.

GROUND:


1. That, the Impugned Seniority List as well as Impugned Appellate Order is illegal, unlawful, void and ineffective.
2. That, same is against the principles of Natural Justice, also.

3. That, as per recommendation of the Public Service Commission, the Appellant was eligible, competent and fit for appointment to the post of Senior Research Officer (BPS-18) in September 2011.
4. That, all the codal formalities for the purpose of appointment in BPS-18 in respect of Appellant was fulfilled in the year 2011.
5. That, the Private Respondents also applied through Public Service Commission to the post of Senior Research Officer BPS-18 but were not recommended for appointment.
6. That, when the Private Respondents failed to get any fruitful result in their favour through the Commission, they obtained Interim Order from Peshawar High Court, Peshawar under melafide intention in order to deprive the Appellant from his due seniority in BPS-18.
7. That, the Writ Petition was purposely delayed by the Private Respondents with the aim of getting promotion before the Appointment of the Appellant under the quota reserved for initial appointment.
8. That, when the Seniority List as stood on 01.06.2013 was prepared, the Appellant along with others agitated their grievance before the Competent Authority in consequence whereof the Departmental Appeal of the Appellant was accepted and he was assigned his seniority as per the date of recommendation of the Public Service Commission. It is important to mention here that the said Seniority List was never objected by the Private Respondents No. 4 to 9 before any court or tribunal hence the same attained finality.
9. That, the private Respondents are being preferred upon the Appellant due to delay caused and pendency of Writ Petition and Interim Order against the appointment of the Appellant in BPS-18 which is, otherwise, not a justified act of the Respondents.
10. That, since the respondents admitted the seniority position of the Appellant in earlier List along with other recommendees of the Commission hence the Impugned Seniority List is not tenable in the eyes of law.
11. That, while issuing the Impugned Seniority List and Impugned Appellate Order, the department ignored the earlier Seniority List and

Appellate Order whereby the Appeal of the Appellant was accepted and Appellant was given seniority as per the date of recommendation of the commission hence the Impugned Order is against the principle enshrined in section 24-A of the General Clauses Act wherein the Respondents / Government is bound to give valid and sound reasons. It is important to mention here that the Appellate Order dated 24.06.2013 is still intact and the same has not been reversed or set aside.

- 12. That, the act of the Respondents is against Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- 13. That, the contents contained in the Departmental Appeal of the Appellant may please treated as integral part of instant Appeal.

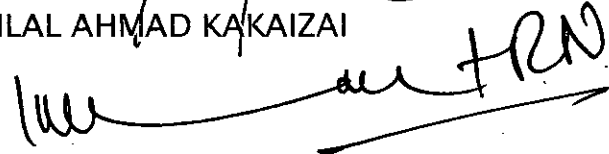
It is therefore requested that the Appeal be accepted as prayed for.


Appellant

Through,


BILAL AHMAD KAKAIZAI

&


INAYAT UR REHMAN
(Advocate, Peshawar)

6

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. _____ / 2015.


Dr. Hamid Ullah Khan

VS

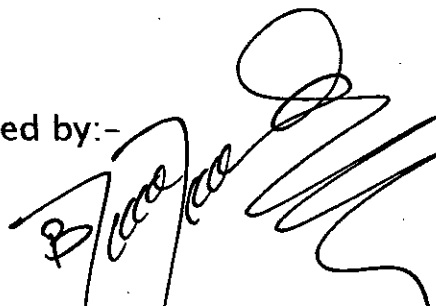
Government of KPK etc

AFFIDAVIT

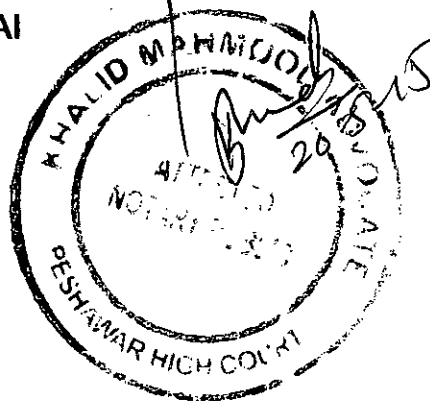
I, Dr. Hamid Ullah Khan, Senior Research Officer, Media & Sterilization Section, Veterinary Research Institute, Peshawar, Appellant do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.


Deponent.

Identified by:-



BILAL AHMAD KAKAIZAI
(Advocate, Peshawar)



BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. _____ / 2015.

Dr. Hamid Ullah Khan VS Government of KPK etc

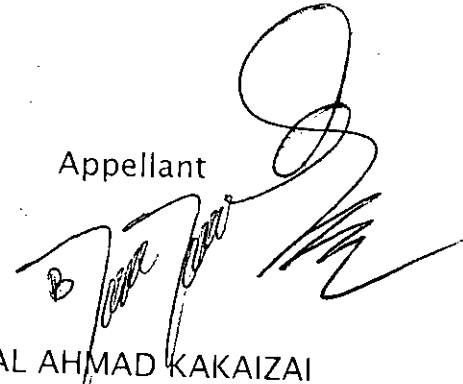
ADDRESSES OF PARTIES.

APPELLANT:

Dr. HAMID ULLAH KHAN, Senior Research Officer, Media & Sterilization Section,
Veterinary Research Institute, Peshawar.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa, Through Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary, Agriculture, Livestock, Cooperative and Fisheries Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Director General Research, Livestock & Dairy Development Department, Bacha Khan Chowk, Peshawar.
4. Dr. Imtiaz Ali Shah, Senior Research Officer, Livestock Research & Development Station, Surezai, Peshawar.
5. Dr. Muhammad Ilyas Khan, Senior Research Officer, Livestock Research & Development Station, Surezai, Peshawar.
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8. Dr. Safirullah, Senior Research Officer, Senior Research Officer, Directorate General Research, Livestock & dairy Development, Veterinary Research Institute, Bacha Khan Chowk, Peshawar.
9. Dr. Tariq Ali, Senior Research Officer, Livestock Research & Development Institute, D.I.Khan.

Appellant
Through, 
BILAL AHMAD KAKAIZAI
(Advocate, Peshawar)

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. _____ / 2015:

Dr. Hamid Ullah Khan

VS

Government of KPK etc

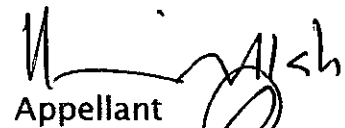
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Dr. Hamid Ullah Khan, Senior Research Officer, Media & Sterilization Section,
Veterinary Research Institute, Peshawar.

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2. Secretary, Agriculture, Livestock, Cooperative and Fisheries Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Director General Research, Livestock & Dairy Development Department, Bacha Khan Chowk, Peshawar.
4. Dr. Imtiaz Ali Shah, Senior Research Officer, Peshawar.
5. Dr. Muhammad Ilyas Khan, Senior Research Officer, Peshawar.
6. Dr. Anwar Ali, Senior Research Officer, Peshawar.
7. Dr. Jehangir Ali, Senior Research Officer, Peshawar.
8. Dr. Safirullah, Senior Research Officer, Peshawar.
9. Dr. Tariq Ali, Senior Research Officer, Peshawar.


Appellant

Through,


BILAL AHMAD KAKAIZAI
(Advocate, Peshawar)

⑧ "A"

42

KHYBER PUKHTOONKHWA PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 24.09.2010

ADVERTISEMENT No. 07 / 2010.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of **Khyber Pakhtunkhwa / F.A.T.A** by **22.10.2010** (candidates applying from abroad by **05-11-2010**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected without intimation to the candidates.

<i>AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:</i>	
1.	<p>FIVE (05) POSTS OF SENIOR RESEARCH OFFICER</p> <p>QUALIFICATION: (A) Ph.D in veterinary animal science/ bio-chemistry, after basic degree of Doctor of Veterinary Medicine or equivalent qualification recognized by PVMC OR (B) M.Sc (Hons)/ M.Phil/ MS in Veterinary animal Science/ bio-Chemistry after basic degree of Doctor of Veterinary Medicine or equivalent qualification recognized by PVMC having 2 years research experience with at least two research publications OR (C) Doctor of Veterinary Medicine or equivalent qualification in veterinary sciences recognized by PVMC having 5 years experience in the relevant field (research) with at least 2 research publications.</p> <p>Note: - Those candidates who have already applied against our Advertisement No. 4/2010 need not apply afresh.</p> <p>AGE LIMIT: 28 to 45 years. PAY SCALE: BPS-18 ELIGIBILITY: Both Sexes. ALLOCATION: Merit.</p>
2.	<p>FOUR (04) POSTS OF RESEARCH OFFICER IN VETERINARY RESEARCH INSTITUTE</p> <p>QUALIFICATION: Doctor of Veterinary Medicines (DVM) or equivalent qualification in Veterinary Science recognized by PVMC.</p> <p>AGE LIMIT: 22 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Merit, Zone-1, Zone-4 and Zone-5.</p>
3.	<p>ONE (01) POST OF RESEARCH OFFICER IN L&DD DEPTT:</p> <p>QUALIFICATION: M.Sc. (Agriculture) preferably in Agronomy or equivalent qualification from a recognized University.</p> <p>AGE LIMIT: 25 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes. ALLOCATION: Zone-2.</p>
4.	<p>SEVEN (07) POSTS OF RESEARCH OFFICER/ FARM MANAGER IN L&DD DEPTT:</p>

CORRIGENDUM

- (A) Three (03) posts of Assistant Advertiser in this Commission's Advertisement No. 07/2008 at Sr. No. 24 have been withdrawn by the Excise and Taxation Department.
- (B) The Qualification for the post of "Theater Nurse" appearing at S.No. 18 of Advertisement No. 4/2010 may be read as "A Grade qualified Nurse". Rest of the conditions will remain intact.
- (C) Two (02) posts of Professor Anatomy, Two (02) posts of Professor Physiology, Two (02) posts of Professor Biochemistry appearing at S.No. 04 respectively, Two (02) posts of Professor General Medicine appearing at S.No. 5, Three (03) posts of Associate Professor Physiology, Two (02) posts of Associate Professor Biochemistry appearing at S.No. 06 respectively and Two (02) posts of Assistant Professor Biochemistry appearing at S.No. 10 of our Advertisement No. 02./2010 for Bannu Medical College, Bannu may be read as under: -

S. No.	Nomenclature of Post	No. of Posts
1.	Professor Anatomy (BPS-20)	01
2.	Professor Physiology (BPS-20)	01
3.	Professor Biochemistry (BPS-20)	01
4.	Professor G.Medicine (BPS-20)	01
5.	Associate Professor Physiology (BPS-19)	02
6.	Associate Professor Biochemistry (BPS-19)	01
7.	Assistant Professor Biochemistry (BPS-18)	01

- (D) The 10 posts of Female Agriculture Officer (BPS-17) advertised in Advt: No. 01/ 2010 at Sr. No. 2 have been withdrawn by the Agriculture Department.
- (E) The name of Department of 05 posts of Female Librarian (BS-16) advertised in Commission's Advertisement No.8/2009 (S.No.01) may be read as "Higher Education Department" instead of "Directorate of Archives and Libraries".

GENERAL CONDITIONS

- (i) Age shall be reckoned on **22/ 10/ 2010**. Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service and upto 3 years for candidates belonging to backward areas specified in the appendix attached to the NWFP Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2008. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificates for all the examinations shall necessarily be required and these should be attached with the application forms.
- (iii) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications Govt / Semi Govt / Autonomous / Semi Autonomous Bodies employees may apply direct

- (iv) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK OF PAKISTAN. Application Fee is Rs.285/- (Rupees Two Hundred Eighty Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs.15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (v) Applications must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (vi) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (vii) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (viii) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (ix) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (x) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xi) In case the number of applications of candidates is disproportionately higher than the number of posts, short listing will be made in anyone of the following manner: -
- Written Test in the Subject.
 - General Knowledge or Psychological General Ability Test.
 - Academic and/or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra.
- Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

Note: -The candidate who apply for the post(s) are advised to make sure that they are eligible for the post in all respects because eligibility of the candidate will be determined strictly according to the rules after conduct of all essential tests.

Atta-ur-Rehman

(ATTA-UR-REHMAN)
Secretary
Khyber Pukhtoonkhwa
Public Service Commission
Peshawar

REGISTERED

Annex B

N.W.F.P. PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar Cantt. (Near Governor House)
PH No. 9213563



No. NWFP-PSC-SR-VI 50046

Office Date: 15/9/2011

COOPERATIVE

To

✓ Hamidullah Khan S/O M. Anwar Khan
Veterinary Research Institute,
Bacha Khan Chowk Peshawar

Subject: - RECTT. OF SENIOR RESEARCH OFFICER (BPS-18) IN
AGRICULTURE, LIVESTOCK & COOPERATIVE (VRI)
DEPARTMENT.

The Commission has recommended you to the Government for appointment, but please do not treat this as a letter of appointment for which Government is the final authority. The Commission cannot entertain any correspondence from you in this regard.


DEPUTY SECRETARY-II
NWFP PUBLIC SERVICE COMMISSION

Handwritten initials/signature



GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

No.SO(L&DD)AD-E-1(335)/2011
Dated Peshawar the 26th September, 2011.

To

The Medical Superintendent,
Police and Services Hospital,
Peshawar.

Subject:

RECRUITMENT OF FIVE POSTS OF SENIOR RESEARCH OFFICERS (BPS-18) IN VETERINARY RESEARCH INSTITUTE: (Advertisement No-04/2010 & 07/2010 S.No.01).

I am directed to refer to the subject noted and to state that the Khyber Pakhtunkhwa Public Service Commission, Peshawar Vide No.K.P.K-PSC-SR-VI/050041, dated 15.09.2011 (copy enclosed) has recommended the following recommends for the posts of Senior Research Officer (BPS-18) in Veterinary Research Institute:

Merit order	Name with Father's Name	Domicile / Zone
1.	Muhammad Ilyas s/o Khafo Khan	Peshawar / 02
2.	Muhammad Sajid s/o Muhammad Younas	Abbottabad / 05
3.	Hamidullah Khan s/o M. Anwar Khan.....	Mohmand Agy / 01
4.	Imtiaz Ali Shah s/o Asmat-ul-Wahab.....	Nowshera / 02
5.	Ishtiaq Ahmed s/o Banaras Khan.....	Abbottabad / 05

2. It is therefore requested to kindly arrange Standing Medical Board for determining the medical fitness of the above recommendees of Public Service Commission.

Encl: As above.

ENDST. NO. & DATE EVEN.

Copy to:

1. DG (Research), L&DD Khyber Pakhtunkhwa Peshawar with the request to submit adjustment proposal of the above named recommendee at earliest
2. Recommendee concerned.
3. P.S to Secretary Agriculture, Livestock and Cooperative Department.

(Dr. Mir Ahmad Khan)
SECTION OFFICER (L&DD)

SECTION OFFICER (L&DD)

DL

13

No. 7356 /MS/SMB Dated Peshawar 01 /10/2011.

From:-
The Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital,
Peshawar.

To:-
The Section Officer (I.&DD)
Govt: KPK Agriculture Livestock &
Cooperative Department.

Subject: - STANDING MEDICAL BOARD.
Sir,

The Following Five Senior Research Officers BPS-18 was examined by the Standing Medical board held in this office on 01/10/2011. The Proceedings of the Standing Medical Board are sent herewith for further necessary action. (List attached)

*Auto
Hand*

[Signature]
Chairman
Standing Medical Board
Medical Superintendent
Police/Services, Hospital,
Peshawar *[Signature]*

14

MEDICAL CERTIFICATE

Name of official HAMID ULLAH KHAN
 Caste or race MOHAMMAD
 Father's name MOHAMMAD ANWAR KHAN
 Residence VILL & POST OFFICE DAKKI,
TEHSIL TANGI, DISTT CHARSAKDA
 Date of birth 17-05-1972
 Exact height by measurement 5' 9"
 Personal mark of identification MOLE UNDER NECK
 Signature of the official [Signature]
 Signature of head of office [Signature]

Seal of office **Dr. Ikhwan Khan** [Signature]
 D.V.M. (U.A.E) M.Sc. (Hons) Pesh
 Principal Research Officer
 Veterinary Research Institute
 Peshawar

I do hereby certify that I have examined Mr. HAMID ULLAH KHAN a candidate for employment in the Office of the VETERINARY RESEARCH INSTITUTE (VRI) and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except 6/6 glasses & pit

I do not consider this as disqualification for employment in the office of the AS ABOVE
 His age according to his own statement 38 YEARS, 5 Months, 14 Days year and by appearance about year THIRTY NINE

[Signature]
 Secretary
 Standing Medical Board
 Police/Services, Hospital,
 Peshawar.
 01/10/11

[Signature]
 MEDICAL SUPERINTENDENT,
 CIVIL HOSPITAL
 Medical Superintendent
 Police/Services, Hospital
 Peshawar
 01/10/2011

LEFT HAND THUMB AND FINGER IMPRESSIONS

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[Signature]
 Physician
 Police/Services, Hospital

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DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR

No. DG (R) L&DD/Est-1 (78)/2007/Vol: III/
To

Dated Peshawar the 1/10/2011

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

Attention Section Officer (L&DD)

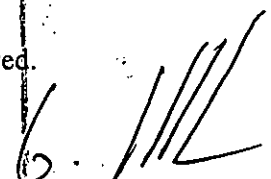
Subject: - **RECRUITMENT OF FIVE POSTS OF SENIOR RESEARCH OFFICERS (BPS-18) IN VETERINARY RESEARCH INSTITUTE, (Advertisement No-04/2010 & 07/2010 S.No.01).**


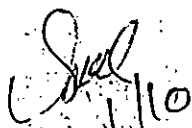
Kindly refer to letter No. SO (L&DD) AD-E-1 (335)/2011 dated 26-09-2011 on the subject noted above.

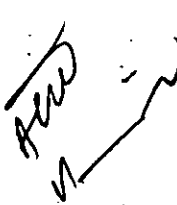
Following Proposal for the Adjustment of newly recommendees/appointees of Public Service Commission, Khyber Pakhtunkhwa is submitted for approval please.

S. No	Name of Recommendee of PSC	Adjustment Proposal
1.	Dr. Muhammad Ilyas	Against the vacant post of Senior Research Officer Poultry Breeding & Production (BS-18) at Veterinary Research Institute, Peshawar.
2.	Dr. Muhammad Sajid	Against the vacant post of Senior Research Officer (BS-18) at Veterinary Research & Disease Investigation Center, Abbottabad.
3.	Dr. Hamidullah Khan	Against the vacant post of Senior Research Officer Bacterial Vaccine (BS-18) at Veterinary Research Institute, Peshawar.
4.	Dr. Imtiaz Ali Shah	Against the vacant post of Senior Research Officer Mastitis (BS-18) at Veterinary Research Institute, Peshawar.
5.	Dr. Ishtiaq Ahmed	Against the vacant post of Senior Research Officer Farm Management (BS-18) at Livestock Research & Development Station Surezai.

It is, therefore, requested that the above proposal may please be approved.

6. 
(DR. GHUFRAN ULLAH)
Ph. D
Director General (Research)

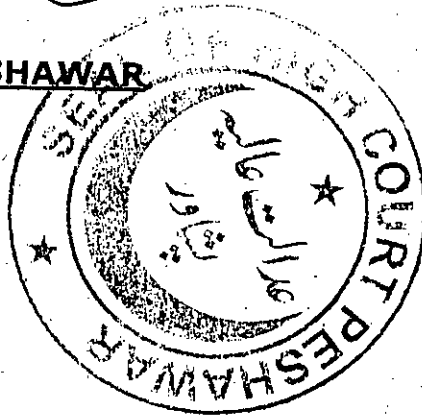





IN THE PESHAWAR HIGH COURT, PESHAWAR

16

D-4



Writ Petition No. 2475 / 2010

Dr. Tariq Ali s/o Rehmat Ali Research officer,
Live stock Research and Development Station Pahar Pur
D. I Khan.

.....PETITIONER

VERSUS

1. **Khyber Pakhtun Khwa** through Chief Secretary.
2. Secretary Agriculture, Live - stock and co-operative department Government of Khyber Pakhtun Khwa, Peshawar.
3. Khyber Pakhtun Khwa Public Service Commission, Peshawar through its chairman. .
4. **Dr. Fida Muhammad** Departmental Representative/Advisor ex. Director General Research Live Stock and Dairy development Department, Khyber Pakhtunkhwa.
5. Director General Research Live - Stock and Dairy development Department, Khyber Pakhtunkhwa
6. **Muhammad Ilyas** S/o Khalo Khan Research Officer Veterinary Research Institute, Bach Khan Cowk Peshawar.
7. **Muhammad Sajid** S/o Muhammad Yunus Research Officer Veterinary Research and Diseases Investigation center Abbotabad.
8. **Hamidullah Khan** S/o Muhammad Anwar Khan Research Officer Veterinary Research Institute, Bacha Khan Cowk Peshawar

ATTESTED

EXAMINER
Peshawar High Court

- Imtiaz Ali shah S/o Asmatul Wahab Research Officer
Veterinary Research Institute, Bach Khan Cowk Peshawar
- 10. Ishtiaq Ahmed S/o Banaras Khan Research Officer
Veterinary Research and Diseases Investigation center
Abbotabad.

..... RESPONDENTS

=====

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

=====

Respectfully Sheweth

1. **That in the year 2002**, the Petitioner obtained degree of Doctor of veterinary Medicine (Ist Class) from University of Agriculture Faisalabad which is one of the leading University imparting agriculture and related education in Pakistan. (Copy of Degree is annexed herewith as **Marked "A"**).
2. **That** in the year 2004 the petitioner after qualifying the examination from Public Service Commission was appointed as Veterinary Officer (Research) in the Live Stock and Diary Development Department. (Copy of the Appointment letter is annexed as **Marked "B"**).
3. **That on 17-8-2004** the petitioner was appointed as Veterinary Officer Research at Veterinary Research and Diagnostic Laboratory D.I Khan.
4. **That** in May 2009, the Petitioner was posted as Research Officer at Live Stock Research and development NWFP Peshawar. It would be important to note that at the time of such posting

2
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ATTESTED
EXAMINER
Peshawar High Court

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

Date of order. Order or other proceedings with the order of Judge

17.11.2011.

W.P. 2475/2011.

Present: Syed Arshad Ali, advocate for petitioner.

Comments called from respondents 3 and 4 are still awaited. Reminder be issued to them to furnish the same within 7 days positively.

Interim relief.

Notice. Till then respondents are restrained to issue appointment letters/appointing respondents 6 to 10 against the post of Senior Research Officers Livestock and Dairy Development Department, Khyber Pakhtunkhwa.

Sd/- Muzha Abu M...
Sd/- Wazir Abu Seth J

CERTIFIED TO BE TRUE COPY

[Signature]
Peshawar
27-11-11

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19-11-11

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

Dated Peshawar the 28th November, 2012.

NOTIFICATION:

NO.SO(L&F)AD-E-1(381)/2012/Vol-II: On the recommendation of the Provincial Selection Board, the Competent Authority is pleased to approve promotion of the following officers to BPS-18, of Livestock & Dairy Development (Research Wing), with immediate effect:

S#	Name of Officer
1.	Dr.Muhammd Ayaz.
2.	Dr.Imtiaz Ali Shah.
3.	Dr.Muhmmad Ilyas Khan.
4.	Dr.Anwar Ali Turi.
5.	Dr.Jehangir Ali.
6.	Dr.Safirullah.
7.	Dr.Tariq Ali.

2. The officers will be on probation for a period of one year in terms of section 6(2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 15 (1) of Khyber Pakhtunkhwa Civil Servants (*Appointment, Promotion & Transfer*) Rules, 1981.

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA,
AGRICULTURE, LIVESTOCK & COOPERATIVE
DEPARTMENT.

ENDST: NO. & DATE EVEN:

Copy to the:

1. ✓ The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. ✓ Director General (Research), Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar, with request to submit adjustment proposal of the above promotees.
3. Officers concerned.
4. Personal files of the officers concerned.
5. P.S to Minister for Livestock, Khyber Pakhtunkhwa.
6. P.S to Secretary, Agriculture, Livestock & Cooperative Department, Khyber Pakhtunkhwa.
7. Master File.

AS (E)
[Handwritten signatures]

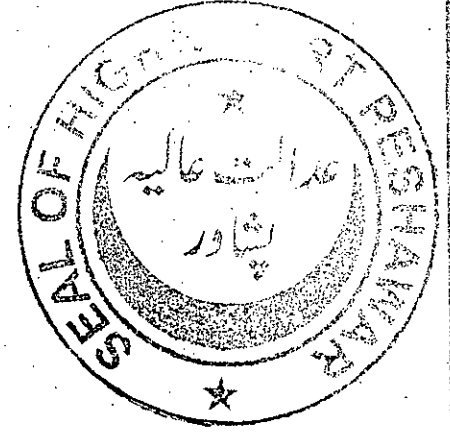
(Dr. Mir Ahmad Khan)
SECTION OFFICER (L&F)

IN THE PESHAWAR HIGH COURT, PESHAWAR

(20)

F 1

Writ Petition No. 2475 / 2010



Dr. Tariq Ali s/o Rehmat Ali Research officer,
Live stock Research and Development Station Pahar Pur
D. I Khan.

.....PETITIONER

VERSUS

1. **Khyber Pakhtun Khwa** through Chief Secretary.
2. Secretary Agriculture, Live - stock and co-operative department Government of Khyber Pakhtun Khwa, Peshawar.
3. Khyber Pakhtun Khwa Public Service Commission, Peshawar through its chairman. .
4. **Dr. Fida Muhammad** Departmental Representative/Advisor ex. Director General Research Live Stock and Dairy development Department, Khyber Pakhtunkhwa.
5. Director General Research: Live - Stock and Dairy development Department, Khyber Pakhtunkhwa
6. **Muhammad Ilyas** S/o Khalo Khan Research Officer Veterinary Research Institute, Bach Khan Cowk Peshawar.
7. **Muhammad Sajid** S/o Muhammad Younus Research Officer Veterinary Research and Diseases Investigation center Abbotabad.
8. **Hamidullah Khan** S/o Muhammad Anwar Khan Research Officer Veterinary Research Institute, Bach Khan Cowk Peshawar

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ATTESTED
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EXAMINED
Peshawar High Court.

26 AUG 2010

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- 9. Imtiaz Ali shah S/o Asmatul Wahab Research Officer
Veterinary Research Institute, Bach Khan Cowk Peshawar
- 10. Ishtiaq Ahmed S/o Banaras Khan Research Officer
Veterinary Research and Diseases Investigation center
Abbotabad.

..... RESPONDENTS

=====

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

=====

Respectfully Sheweth

- 1. **That in the year 2002**, the Petitioner obtained degree of Doctor of veterinary Medicine (Ist Class) from University of Agriculture Faisalabad which is one of the leading University imparting agriculture and related education in Pakistan. (Copy of Degree is annexed herewith as **Marked "A"**).
- 2. **That** in the year 2004 the petitioner after qualifying the examination from Public Service Commission was appointed as Veterinary Officer (Research) in the Live Stock and Diary Development Department. (Copy of the Appointment letter is annexed as **Marked "B"**).
- 3. **That on 17-8-2004** the petitioner was appointed as Veterinary Officer Research at Veterinary Research and Diagnostic Laboratory D.I Khan.
- 4. **That** in May 2009, the Petitioner was posted as Research Officer at Live Stock Research and development NWFP Peshawar. It would be important to note that at the time of such posting

26 AUG 2011

Signature
Peshawar

22

JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT
JUDICIAL DEPARTMENT.

Writ PetitionNo.....2475.....of....2011

J U D G M E N T

Date of hearing: 16th January, 2013

Petitioner(s): (Dr. Tariq Ali) By Mr. I. Ashraf Ali, Advocate.

Respondent(s): Gort. K.P.K. By Mr. Ubaid Razaq, N.A.S.

KHALID MEHMOOD, J.- Dr. Tariq Ali, petitioner

herein, through the instant constitutional petition, has asked for the issuance of an appropriate writ declaring that the entire process of interview for the posts of Senior Research Officers (BPS-18) in presence of respondent No.4 being nullity in the eye of law is of no effect whatever. He has also asked for the issuance of an appropriate writ directing the respondents to conduct a fresh interview for the aforesaid posts excluding respondent No.4 in the panel of interviewers.

Delivered

2. Since the grievance of the petitioner, as per Notification bearing No.SO(L&F)AD-E-1(381)/2012/Vol-II:, dated 28.11.2012, has been redressed as he has been promoted to BPS-18 and thereafter has been posted as Senior Research Officer (Livestock Management), Livestock Research and Development Station, Pahar Pur, D.I.Khan vide Notification bearing No.SO(L&F)AD-E-1(381)/2012/Vol-III, dated

ATTE
EXA
Peshawar

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20.12.2012, this writ petition besides having served out its purpose has become infructuous / redundant. It is, thus, disposed of.

Announced.
16. 01. 2013

Sh. Khalid mehmood
Sh. Shahjehan Akhundzada

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court Peshawar
Authorised Under Article 87 of
the Qanun-e-Shahadat Order 1984

16/1

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Date of Delivery	22-1-13
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Annexure G ~~100-13~~ 24



GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

Dated Peshawar the 21st February, 2013.

NOTIFICATION:

NO.SO(L&F)AD-E-1(335)/2011/Vol-IV: Consequent upon recommendation of the Khyber Pakhtunkhwa Public Service Commission, the Competent Authority is pleased to appoint the following candidates as Senior Research Officer (BS-18) (Rs.20000-1500-50000) plus usual allowances as admissible under the rules, on regular basis with immediate effect:-

Merit order	Name with Father's Name	Domicile / Zone
1.	Muhammad Sajid s/o Muhammad Younas ...	Abbottabad/05
2.	Hamidullah Khan s/o M. Anwar Khan.....	Mohmand Agy/01
3.	Dr.Ishtiaq Ahmad,Senior Research Officer.	Abbottabad/05

TERMS AND CONDITIONS:

- i. They will be governed by such Rules, Regulations, Orders, Acts and Ordinances etc relating to appointment, Promotion, Transfer, Leave, TA, Medical Attendance, Seniority, Efficiency & Discipline and Conduct as have been/may be prescribed by the Government for the category of Government Servants of their status, from time to time and as interpreted by the Government.
- ii. Their services will be on probation for a period of one year extendable for another one Year and will be liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to Government.
- iii. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the Khyber Pakhtunkhwa Government (Efficiency & Disciplinary) Rules, 2011 and the Rules framed from time to time.
- iv. Their inter-se seniority position shall be determined in accordance with the order of merit assigned by the Khyber Pakhtunkhwa Public Service Commission provided these persons selected for appointment to service in any earlier selection shall rank senior to them. Their seniority *vis-à-vis* those appointed otherwise will be determined as provided for in the relevant Service Rules.
- v. Their pay will be fixed under the normal rules of the Government of Khyber Pakhtunkhwa on joining their duties.

2. These officers will be on probation for a period of one year in terms of section 6(2) of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1981.

(cont.....next page)

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3. Consequent upon their appointment, the following adjustments / postings are hereby ordered:-

S.#	Name of Officer	From	To
1.	Dr. Mohaminad Sajid, Senior Research Officer	Veterinary Research Institute, Peshawar.	Senior Research Officer (Tuberculosis and Veterinary Public Health) BPS-18 at Veterinary Research Institute, Peshawar.
2.	Dr. Ishtiaq Ahmad, Senior Research Officer.	-do-	Senior Research Officer (Dairy Husbandry and Dairy Technology) B-18 at Livestock Research and Development Station, Surezai.
3.	Dr. Hamidullah Khan, Senior Research Officer.	-do-	Senior Research Officer (Animal Breeding and Genetics) BPS-18 at Livestock Research and Development Station, Surezai.

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA,
AGRICULTURE, LIVESTOCK & COOPERATIVE
DEPARTMENT.

ENDST. NO. & DATE EVEN.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General (Research), Livestock and Dairy Development, Khyber Pakhtunkhwa.
3. District Accounts Officer, Peshawar.
4. The Manager, Government Printing Press, Khyber Pakhtunkhwa Peshawar.
5. Officer concerned.
6. Personal file of officer concerned.
7. P.S to Chief Secretary, Khyber Pakhtunkhwa.
8. P.S to Minister Livestock and Cooperation Department.
9. P.S to Secretary Agriculture Livestock and Cooperation Department.
10. Master file.

(DR. MIR AHMAD KHAN)
SECTION OFFICER (L&F)

Ikrum Afridi

Aus
Mir

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Confirm the present status/progress in Higher Education Department where this cycle was recommended by the Service Tribunal.

Opinion of Establishment Department may be sought in a situation where promotion has been made on regular basis. Because it has been clearly mentioned under clause 17(2) of the Khyber Pakhtunkhwa, Appointment, Promotion and Transfer Rules, 1989 (Page-24 Esta Code 2011) which provides that:-

(2) "Seniority in various cadres of civil servants promoted by initial recruitment vis-a-vis 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"

Lengthy discussion held and finally it was concluded that:-

- The promotion cycle has never been implemented in research wing.
- The previous promotions/selections have been made on regular basis.
- Keeping in view the current situation the cycle seems impracticable in this department.
- Hence the appeals of Dr. Mohammad Sajid, Dr. Hamidullah Khan and Dr. Ishtiaq Ahmad Senior Research Officers are not maintainable. However they are placed in the seniority list on the basis of the date of recommendations of Public Service Commission before the officers promoted through Provincial Selection Board.

Now their seniority is beyond ambiguity and the modified lists they are placed in the appropriate order of seniority.

Accordingly the revised seniority list of Senior Research Officers as well as Principal Research Officers as well as Principal Research Officers and Research Officers are duly prepared and sent herewith for issuing proper notification please.

Encl: 03

Ghufra Nullah
(GHUFRA NULLAH PhD)
Director General (Research)

24/6/13

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DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT,
KHYBER PAKHTUNKHWA, PESHAWAR

No. DG(Res)L&DD/Est.I(10)/2012/Vol.II/7636 Dated Peshawar the 24/06/2013.

To

The Secretary,
Government of Khyber Pakhtunkhwa,
Agriculture, Livestock, Cooperatives and
Fisheries Department, Peshawar.

Attention Section Officer(L&F)

Subject:- DEPARTMENTAL APPEAL FOR FIXATION AND PLACEMENT IN THE SENIORITY LIST OF SENIOR RESEARCH OFFICERS(SROs) IN THE LIGHT OF ESTABLISHMENT & ADMINISTRATION DEPARTMENT (REGULATION WING)

Please refer to your letter No. SO(L&F)AD-E-I(335)/2011 dated 26-04-2013 on the subject noted above.

In this connection it is please stated that the following Officers (applicants) have claimed the seniority according to the cycle of selection and promotion (25:75)

- 1. Dr. Mohamad Sajid Senior Research Officer
- 2. Dr. Ishtiaq Ahmad -do-
- 3. Dr. Hamidullah Khan -do-

For the purpose to resolve the issue a meeting of all the Principal Research Officers was called on 16-05-2013 in chair of the undersigned wherein the background history of the seniority position of Senior Research Offices with particular scenario of the four tier structure of the department was examined. The seniority position of each officer (SROs) has been evaluated as per approved ratio of 25:75 as per the laid down recruitment rules as under:-

25% by initial recruitment and

75% by promotion on the basis of seniority-cum-fitness from amongst Research Officers/Farm Managers/Biochemists, having 05 years service in BS-17 in the cadre with two Research Publications and registered with PVMC.

All the participants expressed their views and tabled various suggestions to clarify the situation of cycle of selection/promotion like searching/asking those departments where the cycle has been implemented or otherwise.

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**SENIORITY LIST OF SENIOR RESEARCH OFFICER BS-18 AT DIRECTORATE GENERAL (RESEARCH) LIVESTOCK AND DAIRY DEVELOPMENT
DEPARTMENT KHYBER PAKHTUNKHWA, PESHAWAR. AS STOOD ON 01-06-2013.**

Sanctioned Strength 29
 RVDICs 15
 ADSS 05
 09

Name of Officers with Academic Qualifications	Date of Birth and Domicile	Date of 1 st entry into Govt service	Regular appointment/promotion to present posts			Present appointment	Remarks
			Date	BS	Method of recruitment		
Dr. Muhammad Ayyaz DVM, M.Phil. (Micro) 4 Months Training Course at Japan	01-02-1961 Mansehra	03-09-1985	21-12-2012	18	By Promotion	Senior Research Officer	
Dr. Khisro Kaleem DVM, M.Sc (Hons), EMBA	01-04-1970 Charsadda	28-10-2009	28-10-2009	18	By Initial recruitment	Senior Research Officer	
Dr. Willayat Hussain DVM, 11 months training in FR Germany	05-04-1962 Swabi.	02-07-1986 Extension Wing 29-12-1988 Research Wing	02.12.2010	18	By Promotion	Senior Research Officer	
Dr. Pervez Shah DVM, M.Sc (Hons) 11 months training Course in FR Germany	02-02-1966 Malakand Agency	i. 05-09-1990 Extension Wing ii. 25-07-1991 Research Wing	06.08.2011	18	By Promotion	Senior Research Officer	
Dr. Hameed Ullah, DVM, M.Sc (Hons)	14-03-1968 Bannu	22-05-1993	28-07-2009	18	By Promotion	Senior Research Officer	
Dr. Farhat Jan DVM, M.Sc (Hons)	15-08-1966 Khyber Agency	06-03-1995	01-06-2011	18	By Promotion	Senior Research Officer	
Dr. Rahim Ullah Shah DVM, M.Sc (Hons)	21-12-1967 Swat	06-03-1995	28-07-2009	18	By Promotion	Senior Research Officer	
Dr. Akhtar Ali, DVM	14-03-1966 Bannu	09-03-1995	28-07-2009	18	By Promotion	Senior Research Officer	
Dr. Barkat Khan, DVM, M. Sc (Hons)	01.03.1967 Peshawar	06-03-1995	02.12.2010	18	By Promotion	Senior Research Officer	
Dr. Abdur Raziq DVM, M.Sc (Hons)	12-05-1968 Karak	25-06-1995	02.12.2010	18	By Promotion	Senior Research Officer	
Dr. Faizul Hassan DVM, M.Sc (Hons)	25-02-1968 Swat	05-09-1995	02.12.2010	18	By Promotion	Senior Research Officer	
Dr. Fakhr-UI-Islam DVM, M.Sc (Hons)	04-10-1969 Mardan	30-05-2003	02.12.2010	18	By Promotion	Senior Research Officer	

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		1967					
	DVM, M.Sc (Hons)	Waziristan Agency	30-05-2003	02.12.2010	18	By Promotion	Senior Research Officer
14.	Dr. Khalid Khan DVM, M.Phil, Pharmacology & Toxicology	15-03-1975 Bannu	18-06-2004	02.12.2010	18	By Promotion	Senior Research Officer
15.	Dr. RafiUllah DVM	05-06-1970 Laki Marwat	21-06-2004	02.12.2010	18	By Promotion	Senior Research Officer
16.	Dr. Muhammad Mujtaba DVM	17-03-1976 Laki Marwat	25-06-2004	01-06-2011	18	By Promotion	Senior Research Officer
17.	Dr. Muhammad Bilal DVM, M.Sc (Hons), Pathology	28-08-1979 FATA Orakzai Agency	22-06-2004	01-06-2011	18	By Promotion	Senior Research Officer
18.	Dr. Muhammad Ilyas Khan DVM	04-04-1973 Peshawar	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
19.	Dr. Muhammad Sajid, DVM, M.Phil	25-08-1979 Abbottabad	17-08-2004	22-02-2013	18	By Initial recruitment	Senior Research Officer
20.	Dr. Hamid Ullah Khan, DVM, M.Sc (Hons)	17-05-1972 Mohmand Agency	17-08-2004	26-02-2013	18	By Initial Recruitment	Senior Research Officer
21.	Dr. Imtiaz Ali Shah, DVM	18-11-1973 Nowshera	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
22.	Dr. Ishtiaq Ahmad, DVM, M.Sc (Hons) Gold Medalist	02-04-1976 Abbottabad	28-05-2007	26-02-2013	18	By Initial Recruitment	Senior Research Officer
23.	Dr. Anwar Ali DVM	20-04-1972 Kuram Agency	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
24.	Dr. Jehangir Ali DVM	15-01-1976 Swabi	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
25.	Dr. Safir Ullah DVM	05-09-1976 Chitral	20-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
26.	Dr. Tariq Ali DVM	10-03-1978 Karak	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer

Note: - Certified that the seniority list is final, undisputed and circulated among all concerned

The Seniority of Officer at S.No. 18 to 22 as per order of merit of the Public Service Commission dated 08.01.2013.

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(GHUFRAN ULLAH, Ph.D.)
Director General (Research)

DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

Tel: 91-9210218-19

Fax: 91-9210220

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SENIORITY LIST OF SENIOR RESEARCH OFFICERS BPS-18 AS STOOD ON 01.07.2014

Total Sanctioned Strength 31
VRI 15
FMD Research Centre 01
VR&DICs 05
Livestock R&D Stations 10

S.#	Name of Officer With Academic Qualifications	Date of Birth and Domicile	Date of 1 st entry into Govt. Service	Regular Appointment / Promotion to present post			Present Appointment	Remarks
				Date	BPS	Method of recruitment		
1.	Dr. Muhammad Ayaz, DVM, M. Phil; (Micro), 4 Months Training at Japan.	01-02-1961 Mansehra	03-09-1985	21-12-2012	18	By Promotion	Senior Research Officer	Promotion deferred by the PSB held on 27/6/2009 due to his deputation to a Federal Government Project
2.	Dr. Wilayat Hussain DVM, 13 months training in FR Germany	05-04-1962 Swabi.	i. 02-07-1986, Extension Wing ii. 29-12-1988 Research Wing	02.12.2010	18	By Promotion	Senior Research Officer	Promotion deferred in the PSB dated 27/6/2009 due to non finalization of his representation against the adverse remarks recorded in his PER of year 200
3.	Dr. Pervez Shah DVM, M. Sc (Hons) Pathology 13 months training at Germany	02-02-1966 Malakand Agency	i. 05-09-1990 Extension Wing ii. 25-07-1991 Research Wing	06.08.2011	18	By Promotion	Senior Research Officer	Being on ex-Pakistan leave Promotion deferred by the PSB held on 27/6/2009.
4.	Dr. Hameed Ullah, DVM, M. Sc (Hons)	14-03-1968 Bannu	22-05-1993	28-07-2009	18	By Promotion	Senior Research Officer	
5.	Dr. Rahmat Jan DVM, M. Sc (Hons)	15-08-1966 Khyber Agency	06-03-1995	05-08-2011	18	By Promotion	Senior Research Officer	Being on ex-Pakistan leave Promotion deferred by the PSB held on 27/6/2009
6.	Dr. Rahim Ullah Shah DVM, M. Sc (Hons), Parasitology	21-11-1967 Swat	06-03-1995	28-07-2009	18	By Promotion	Senior Research Officer	
7.	Dr. Akhtar Ali DVM	14-01-1966 Bannu	09-03-1995	28-07-2009	18	By Promotion	Senior Research Officer	

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17

Annex - page - 17

New
List

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DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

Tel: 91-9210218-19

Fax: 91-9210220

8.	Dr. Khisro Kaleem DVM, M. Sc (Hons) LM, EMBA	01-04-1970 Charsadda	28-10-2009	28-10-2009	18	By Initial recruitment	Senior Research Officer
9.	Dr. Barkat Khan DVM, M. Sc (Hons)	01.03.1967 Peshawar	06-03-1995	02.12.2010	18	By Promotion	Senior Research Officer
10.	Dr. Abdur Raziq DVM, M. Sc (Hons) LM	12-05-1968 Karak	25-06-1995	02.12.2010	18	By Promotion	Senior Research Officer
11.	Dr. Faizul Hassan DVM, M. Sc (Hons)	25-02-1968 Swat	05-09-1995	02.12.2010	18	By Promotion	Senior Research Officer
12.	Dr. Fakhr-UI-Islam DVM, M. Sc (Hons) Poultry Science	04-10-1969 Mardan	30-05-2003	02.12.2010	18	By Promotion	Senior Research Officer
13.	Dr. Muhammad Rashid Khan DVM, M. Sc (Hons)	01-11-1968 FATA North Waziristan Agency	30-05-2003	02.12.2010	18	By Promotion	Senior Research Officer
14.	Dr. Khalid Khan, DVM, M. Phil Pharmacology & toxicology	15-03-1975 Bannu	18-06-2004	02.12.2010	18	By Promotion	Senior Research Officer
15.	Dr. RafiUllah DVM, M. Sc(Hons) LM	05-06-1970 Lakki Marwat	21-06-2004	02.12.2010	18	By Promotion	Senior Research Officer
16.	Dr. Muhammad Mujtaba DVM	17-03-1976 Laki Marwat	25-06-2004	01-06-2011	18	By Promotion	Senior Research Officer
17.	Dr. Muhammad Bilal, DVM, M. Sc (Hons), Pathology	28-08-1979, FATA Orakzai Agency	22-06-2004	01-06-2011	18	By Promotion	Senior Research Officer
18.	Dr. Imtiaz Ali Shah DVM, M S Epidemiology & Public Health	18-11-1973 Nowshera	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
19.	Dr. Muhammad Ilyas Khan DVM	04-04-1973 Peshawar	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
20.	Dr. Anwar Ali DVM, M. Sc (Hons) LM	20-04-1972 Kurram Agency	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
21.	Dr. Jehangir Ali DVM	15-01-1976 Swabi	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer
22.	Dr. Saif Ullah, DVM, M. Phil Livr	05-09-1976 Chitral	20-08-2004	21-12-2012	18	By Promotion	Senior Research Officer

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DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

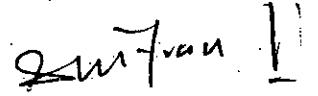
Tel: 91-9210218-19

Fax: 91-9210220

(32)

23	Dr. Tariq Ali, DVM, M. Phil L M	10-03-1978 Karak	17-08-2004	21-12-2012	18	By Promotion	Senior Research Officer	
24	Dr. Muhammad Sajid, DVM, M. Phil Epidemiology	25-08-1979 Abbottabad	17-08-2004	22-02-2013	18	By Initial recruitment	Senior Research Officer	Selected through Public Service Commission
25	Dr. Hamid Ullah Khan, DVM, M. Sc (Hons), LM	17-05-1972 Mohmand Agency	17-08-2004	26-02-2013	18	By Initial Recruitment	Senior Research Officer	-Do-
26	Dr. Ishtiaq Ahmad, DVM, M. Sc (Hons), Poultry Science	02-04-1976 Abbotabad	28-05-2007	26-02-2013	18	By Initial Recruitment	Senior Research Officer	-Do-

Note: - Certified that the seniority list verified by members of the committee specially constituted for ascertaining the seniority of SROs as per directives of the Administrative Department letter # SO(L&F)AD-E-1(335)/2014 dated 13th March 2014 in reference to Establishment Department letter # SOR.III(E&AD)1-2/2014(KC) dated March 5, 2014 is final.
The inter se Seniority of Officers at S. No. 24 to 26 is as per order of merit of the Public Service Commission dated 08.01.2013.


(Dr. Ghufuranullah)
Director General (Research)



(19)

No: 294/Media

Dated: 02/04/2015

To

The Secretary,
Agriculture, Livestock, Cooperative and Fisheries,
Government of Khyber Pakhtunkhwa, Peshawar

Through Proper Channel

Subject: Departmental Appeal For Fixation and Placement in the Seniority List of Senior Research Officers (SROS) in the Light of Establishment & Administration Department (Regulation Wing) Letter NO. SOR.III (E&AD) 1-2/09/Agri Deptt Dated 26/01/2010 and Agriculture, Livestock & Cooperative Department Letter NO. SO (L&DD) AD-E-1(335)2009/VOL: III Dated 19/02/2010 & Letter NO. SO (L&DD) AD-2(121)/PF/2011 Dated 31/05/2012

Sir

Kindly refer to the above cited subject and to the below paras for your kind, sympathetic and urgent considerations:

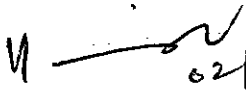
- 1- That I have appealed for the fixation and placement in the seniority list of Senior Research Officer vide letter Nos: LR & DS/AB&G/No-26 dated 05/04/2013 and LR & DS/AB&G/No-187 dated 21/04/2014 (**Annexure-page: 1-4**).
- 2- That according to the Establishment & Administration Department (Regulation Wing) letter NO. SOR.III (E&AD) 1-2/09/Agri Deptt dated 26/01/2010 (Annexure-page: 5), Agriculture, Livestock & Cooperative Department letter NO. SO (L&DD) AD-E-1(335)2009/VOL: III dated 19/02/2010 (Annexure-page: 6) & letter NO. SO (L&DD) AD-2(121)/PF/2011 dated 31/05/2012 (Annexure-page: 7) and as per the decision of Service Tribunal of Khyber Pakhtunkhwa, the first vacancy of the first cycle and every first vacancy of the next cycle of each set of vacancies have to be reserved for initial recruitment where the quota of initial recruitment is applicable (Annexure-page: 8-12).
- 3- That I have been recommended by the Khyber Pakhtunkhwa Public Service Commission for the post of SRO under the 25% reserved quota to be filled in by initial recruitment (**Annexure-page: 13-16**). But at this stage the further processing of my case i.e appointing and posting was stayed by the Honorable Peshawar High Court in a writ petition for about a long period of 18 months.
- 4- That this period of stay was badly exploited by the department and even six (06) other officers, recommended for promotion by the Provincial Selection Board 18 months later were astonishingly placed senior to the undersigned.
- 5- That it is worthwhile to mention that the decision of Khyber Pakhtunkhwa Service Tribunal as mentioned in Para- 2 has already been adopted for other officer/officers during the fixation and placement of their seniority as Senior Research Officers in this department.

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6- That the latest seniority list (Annexure-page: 17-19) sent by this department vide letter No: DG(R)L&DD/Est.I/4996 dated 05-11-2014 certified by DG (Research) is disputed and the views/comments of the undersigned have not been sorted out nor it is vetted by the undersigned.

Thus keeping in view the facts mentioned in the above Paras, It is therefore requested that:

- a- The seniority of the undersigned may please be fixed and placed at serial No. 10 in the Seniority list of Senior Research Officers (Refer to paras Nos- 1, 2 and 3).
- b- That the exploitation of the court stay order made by the department may be corrected (**Refer to para No- 4**)
- c- That a justified and uniform policy may be adopted for everyone during fixation of seniority (**Refer to para No- 5**).
- d- That the latest seniority list (**Refer to para No- 6**) sent to your good office vide letter No: DG(R)L&DD/Est.I/4996 dated 05-11-2014 may be returned as disputed until vetted/viewed by all concened officers before certification, please



H  02/04/2015
(Dr. Hamid Ullah Khan)
Senior Research Officer
Media & Sterilization Section
Veterinary Research Institute
Peshawar

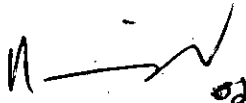
No: 295-96/Medis

Dated: 02/04/2015

CC:

- 1- Copy of the above in advance is forwarded to the Secretary Agriculture, Livestock & Cooperative Government of Khyber Pakhtunkhwa, Peshawar
- 2- Copy of the above for information is forwarded to the Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar

H  02/04/2015
(Dr. Hamid Ullah Khan)
Senior Research Officer
Media & Sterilization Section
Veterinary Research Institute
Peshawar



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**DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK AND DAIRY DEVELOPMENT DEPARTMENT,
KHYBER PAKHTUNKHWA, PESHAWAR**

No. DG(Res) L&DD/Est.I(10)/2012/Vol.III/
To

17787

Dated Peshawar the 21/04/2015.


✓
Dr. Hamid Ullah Khan,
Senior Research Officer
Veterinary Research Institute,
Peshawar.

Subject:- DEPARTMENTAL APPEAL FOR FIXATION AND PLACEMENT IN THE SENIORITY LIST OF SENIOR RESEARCH OFFICERS(SROs) IN THE LIST OF ESTABLISHMENT & ADMINISTRATION DEPARTMENT (REGULATION WING) LETTER NO. SOR-III(E&AD)1-2/09/AGRI DEPTT DATED 26-01-2010 AND AGRICULTURE, LIVESTOCK & COOPERATIVE DEPARTMENT LETTER NO. SO(L&DD)AD-E-1 (335)2009/VOL.III DATED 19-02-2010 & LETER NO. SO(L&DD)AD-2 (121)/PF/2011 DATED 31/05/2012.

Reference your appeal No. 294/Media dated 02-04-2015 on the subject noted above.

In this connection it is to inform you that proper seniority list of Senior Research Officers was prepared and submitted to the Administrative Department for onward submission to the Establishment Department for proper determination, authentication and notification but the Establishment Department vide their letter No.SOR-III(E^AD)1-2(2014(KC) dated 05-03-2014 has quoted their ruling which follows as ***“Seniority in various cadres of civil servants appointed by initial recruitment vis-à-vis 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”.***

In light of the above ruling, a committee comprising of senior most PROs was constituted to examine and prepare a fresh seniority list according to the law and acts as per the opinion of Establishment Department as mentioned above you have been placed in the exact position in the seniority list.


(GHUFRAN ULLAH PhD)
 Director General(Research)

No. DG(Res) L&DD/Est.I(10)/2012/Vol.III/

Dated Peshawar the __/04/2015.

Copy of the above is forwarded to the Section Officer(LFC) Government of Khyber Pakhtunkhwa, Agriculture, Livestock, Cooperatives and Fisheries Department for information with reference to endorsement No. -295-96 dated 02-04-2015 by the appellant regarding his subject appeal please.




(GHUFRAN ULLAH PhD)
 Director General(Research)

Before KPK Service

بعدالت

Tribunal, Peshawar

Appellant
Govt. of F.K.

Dr. Hamid Ullah Khan

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام Peshawar کیلئے Bilal A. Kakaiyal
Nayat-ur-Rishwan

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساتھ

پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 20 _____ ماہ _____ 2015

العبد _____ واہ العبد _____

کے لئے منظور ہے۔

بمقام

DR. Hamid Ullah Khan

Accepted & Accepted
Bilal A. Kakaiyal
Nayat-ur-Rishwan