

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 5048

Dated 3/5/2023

C. M. No. _____ of 2023
IN
Service Appeal No.7608/2021

Muhammad Waqas. Appellant

VERSUS

Forestry, Environment & Wildlife Department & 8 others Respondents

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APPELLANT / APPLICANT

Through

Amin ur Rehman Yusufzai

Khalid Khan Mohmand

&

Muaz Ashraf Khalil

Advocates, Peshawar
3-A, Park Avenue, Bethani Plaza,
University Town, Peshawar

Cell No.0321-9022964 & 0342-9101124

Dated: 03.05.2023

(1)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
P E S H A W A R**

C. M. No. _____ of 2023
IN
Service Appeal No.7608/2021

Muhammad Waqas. **Appellant**

V E R S U S

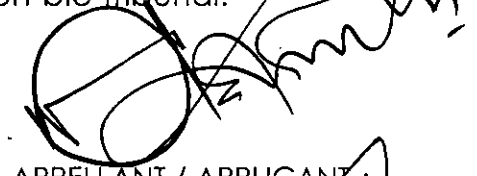
Forestry, Environment & Wildlife Department & 8 others **Respondents**

**APPLICATION, FOR AND ON BEHALF OF APPELLANT, FOR PLACING ON
FILE ADVERTISEMENT NO.03/2016 DATED: 16.06.2016, BEING ESSENTIAL
FOR JUST DECISION OF THE CASE AND PROPER ASSISTANCE OF THIS
HON'BLE TRIBUNAL.**

Respectfully Sheweth:

1. That the titled Appeal is pending adjudication before this Hon'ble Tribunal and fixed today i.e. 03.05.2023, for onward proceedings.
2. That at the time of filing of the titled appeal, the subject mentioned advertisement dated: 16.06.2016, although was available however not annexed therewith inadvertently, hence the instant application.

It is therefore, most humbly prayed that on acceptance of instant application, the subject mentioned advertisement dated: 16.06.2016 may be ordered to be placed on main file of the titled Appeal, being essential for just decision of the case and proper assistance of this Hon'ble Tribunal.



APPELLANT / APPLICANT

Through

Amin ur Rehman Yusufzai

Khalid Khan Mohmand

&

Muaz Ashraf Khalil

Advocates, Peshawar
3-A, Park Avenue, Bethani Plaza,
University Town, Peshawar

Cell No.0321-9022964 & 0342-9101124

Dated: 03.05.2023

(2)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
P E S H A W A R**

C. M. No. _____ of 2023
IN
Service Appeal No.7608/2021

Muhammad Waqas. **Appellant**

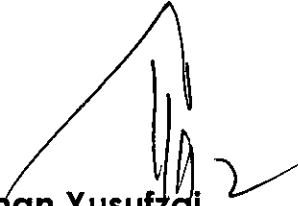
V E R S U S

Forestry, Environment & Wildlife Department & 8 others **Respondents**

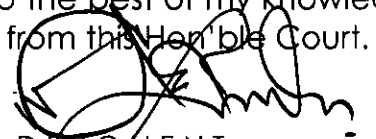
A F F I D A V I T

I, Muhammad Waqas Khan, SDFO(BPS-17), Unit-3, Forestry Planning & Monitoring Circle, Peshawar, do hereby solemnly affirm declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and that nothing has been kept concealed from this Hon'ble Court.

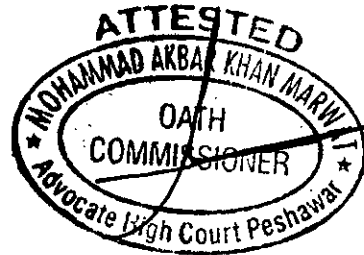
Identified by:



Amin-ur-Rehman Yusufzai
Advocate, Peshawar.



DEPONENT
CNIC #: 11101-2900035-7
Cell: 0333-9737274



03/5/23

(3)

**KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION**

2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

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

Dated: 16.06.2016

ADVERTISEMENT No. 03 / 2016.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **15.07.2016**. Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

AGRICULTURE LIVESTOCK & COOPERATIVE DEPTT:	
1.	<p>ONE (01) POST OF ASSISTANT FODDER BOTANIST IN LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT (RESEARCH)</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-1.</p>
2.	<p>TWO (02) POSTS OF VETERINARY OFFICER (HEALTH) (WOMEN QUOTA) IN DIRECTORATE OF LIVESTOCK & DAIRY DEVELOPMENT (EXTENSION).</p> <p>QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Science from recognized University and registered with Pakistan Veterinary Medical Council (PVMC).</p> <p>AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Female. ALLOCATION: Merit.</p>
3.	<p>FOUR (04) POSTS OF MALE LIVESTOCK PRODUCTION OFFICER (HEALTH) IN LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT (EXTENSION).</p> <p>QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry from a recognized University; Or (ii) Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Science from a recognized University and registered with Pakistan Veterinary Medical Council (PVMC).</p> <p>AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Male. ALLOCATION: One each to Merit Zone-1, 2 and 3.</p>
COMMUNICATION & WORKS DEPARTMENT	
4.	<p>FOUR (04) POSTS OF ASSISTANT ENGINEER CIVIL IN C&W DEPARTMENT.</p> <p>QUALIFICATION: Degree in B.E/B.Sc Engineering (Civil) from a recognized University.</p> <p>AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Merit, Zone-1, 2 & 5.</p>

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5.	<p>SIX (06) POSTS OF SUB ENGINEER CIVIL IN C&W DEPARTMENT</p> <p>QUALIFICATION: Diploma of Associate Engineering Civil (D.A.E) from a recognized Board of Technical Education.</p> <p>AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11 ELIGIBILITY: Both Sexes. ALLOCATION: One each to Zone-1, 3, 4, & 5 and Two to Zone-2.</p>
6.	<p>ONE (01) POST OF SUB ENGINEER CIVIL (MINORITY QUOTA) C&W DEPTT:</p> <p>QUALIFICATION: Diploma of Associate Engineering Civil (D.A.E) from a recognized Board of Technical Education.</p> <p>AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11 ELIGIBILITY: Both Sexes. ALLOCATION: Merit.</p>
7.	<p>ONE (01) (LEFTOVER) POST OF JUNIOR SCALE STENOGRAPHER IN C&W DEPARTMENT.</p> <p>QUALIFICATION: (i) Intermediate or equivalent from a recognized board (ii) A speed of 60 words per minute is Shorthand in English and 35 words per minute in Typewriting in English and knowledge of Computer in using MS Word and MS Excel.</p> <p>AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14 ELIGIBILITY: Both Sexes. ALLOCATION: Zone-5.</p>
ENVIRONMENT DEPARTMENT	
8.	<p>NINE (09) POSTS OF SUB DIVISIONAL FOREST OFFICER IN THE OFFICE OF CHIEF CONSERVATOR OF FORESTS.</p> <p>QUALIFICATION: Master's Degree in Forestry from a recognized University / Institute OR Second Class Bachelor's Degree in Forestry from a recognized University / Institute. OR Second Class Bachelor's Degree in Agriculture or other Science subject from a recognized University. Preference will be given to those having qualification prescribed first.</p> <p>Note: - Appointment of candidates selected for the posts by the Public Service Commission shall be made subject to the following conditions: -</p> <ol style="list-style-type: none"> i. The selected candidates shall undergo and successfully complete the training at the Pakistan Forest Institute leading to Master's Degree in Forestry. Those already having Master's Degree in Forestry from PFI shall be exempted from such training. ii. The selected candidates shall produce certificate from the standing Medical Board at Peshawar regarding their physical and mental fitness for performing the duties required of them. iii. The selected candidates shall execute a bond with the Forest Department to the effect that on successful completion of the training they shall serve the Government for at least five years and in default shall refund all the expenses incurred in connection with their training and education. <p>AGE LIMIT: 21 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Male. ALLOCATION: Two each to Merit, Zone-1 & 3 and One each to Zone-2,4 & 5.</p>
9.	<p>ONE (01) POST OF SUB DIVISIONAL FOREST OFFICER (MINORITY QUOTA) IN THE OFFICE OF CHIEF CONSERVATOR OF FOREST.</p> <p>QUALIFICATION: Master's Degree in Forestry from a recognized University / Institute OR Second Class Bachelor's Degree in Forestry from a recognized University / Institute. OR Second Class Bachelor's Degree in Agriculture or other Science subject from a recognized University. Preference will be given to those having qualification prescribed first.</p>

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- (v) Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) 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 not be accepted which shall be rejected. Candidates can also apply online through the Commission's website (www.kpppsc.gov.pk). However the application fee needs to be deposited in State Banks of Pakistan or a National Bank of Pakistan Branch under head of account No. C02101- Organs of State-Examination Fee of KP PSC through Challan on or before the closing date. The same alongwith attested copies of all the documents need to be submitted to the Commission within 10 days.
- (vii) 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.
- (viii) Applicants married to Foreigners are considered only on production of the Govt: Relaxation Orders.
- (ix) 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).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) 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.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) The candidates applying for posts requiring experience are advised to fill in the requisite proforma and provide the experience certificate available on the Commission's website and submit it alongwith the application form. The application form without this proforma and certificate shall not be accepted/ processed.
- (xiv) 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: -
 (a) Written Test in the Subject.
 (b) General Knowledge or Psychological General Ability Test.
 (c) Academic and/or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

- (1) Main Branches of:
 Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra
- (2) Saddar Road Branch, Tehkal Payan Branch, G.T Road (Nishtar Abad) Branch and University Campus Branch Peshawar.
- (3) 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.

(Sharif Hussain)
Secretary
 Khyber Pakhtunkhwa
 Public Service Commission
 Peshawar

ATTESTED

وکالت نامہ

بعدالت سے سے شریعتی عدالت
مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام

مخانب **Appellant** دعویٰ اجرم

تھانہ " ایف آئی آر " تاریخ " "

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام

امین الرحمن یوسفزئی و خالد خان مہمند

ایڈووکیٹس ہائی کورٹ

کو بدین شرط 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 مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بڑور تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد ثالثی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا ایگلی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند رہے مورخہ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED

امین الرحمن یوسفزئی
ایڈووکیٹ ہائی کورٹ اینڈ فیڈرل شریعت کورٹ آف پاکستان
ایڈووکیٹ آئی ڈی نمبر: BC-10-7562
موبائل نمبر: 0321-9022964
شناختی کارڈ نمبر: 17301-5813582-3

خالد خان مہمند
ایڈووکیٹ ہائی کورٹ، پشاور
ایڈووکیٹ آئی ڈی نمبر: BC-18-1115

آفس: 3-A، بھٹنی پلازہ، پارک ایونیو، یونیورسٹی ٹاؤن چوک،

ایڈووکیٹ معاز اسرف خلیل
BC-19-1719