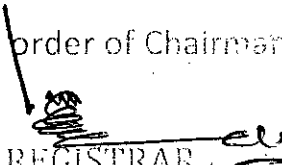


FORM OF ORDER SHEET

Court of _____

Implementation Petition No. 248 /2023

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1 | 14.04.2023 | <p>The execution petition of Mr. Hanif Ur Rehman submitted today by Mr. Taimur Haider Khan Advocate. It is fixed for implementation report before Single Bench at Peshawar on _____ . Original file be requisitioned. AAG has noted the next date.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> |

HAG

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE
TRIBUNAL, PESHAWAR.

248

Execution/Implementation petition No. _____/2023
In
Service Appeal No. 1227/2020

Hanif Ur Rehman Petitioner/Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary &
another Respondents

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| 5. | Copy of appeal and its judgment dated 14.01.2022 | A | 11-36 |
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Petitioner/
Through

Appellant

Taimur Haider Khan
Advocate, Supreme Court
Taimur Law Associates
Office: Office No.37th, 2nd Floor,
Malik Tower, Pajjagi Road,
Peshawar (0346-9192561)

1

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

Execution/Implementation petition No. 247/2023

In

Service Appeal No. 1227/2020

Hanif Ur Rehman, Assistant (BPS-16), at Climate Change, Forestry, environment & Wildlife department at Civil Secretariat, Peshawar.

..... Petitioner/Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary Establishment, Khyber Pakhtunkhwa, Peshawar.

..... Respondents

**EXECUTION PETITION AGAINST THE
RESPONDENTS BY NOT COMPLYING
WITH THE CLEAR CUT
DIRECTION/JUDGMENT OF THIS
HON'BLE TRIBUNAL VIDES DATED
14.01.2022, WHEREBY THE APPEAL OF
THE PETITIONER/APPELLANT HAS
BEEN ALLOWED BY THIS HON'BLE
TRIBUNAL, BUT UNFORTUNATELY
SINCE THE INCEPTION OF THE IBID
JUDGMENT THE RESPONDENTS ARE
LETHARGIC TO OBEY THE ORDER,
KEEPING IN VIEW, THE RESPONDENTS
SATISFIED THE PETITIONER BY**

ASSURING TO COMPLY WITH THE
ORDER OF THIS HON'BLE TRIBUNAL IN
ITS TRUE LETTER AND SPIRIT IN THE
PREVIOUS EXECUTION PETITION VIDES
ORDER DATED 10TH OCTOBER, 2022,
BUT UNFORTUNATELY VIDES UNDUE
AND UNTRUE COMMITMENTS DILLY
DALLYING THE MATTER EVEN AFTER
THE LAPSE OF ABOUT 16 MONTHS OF
THIS HON'BLE COURT TRIBUNAL
JUDGMENT.

Prayer:

It is therefore most humbly prayed by acceptance of instant execution petition, on the basis of expounded subjects, facts, the respondents may kindly be directed to execute the clear cut direction of this Hon'ble tribunal in its true letter and spirit and stern action may kindly be taken against the violator as per law.

Respectfully Sheweth;

- 1) That the petitioner has filed service appeal No. 1227/2020 in the Hon'ble tribunal against the notification dated 25.06.2019, whereby the petitioner has been placed in surplus pool. Accordingly the petitioner prayed that the impugned notification dated 25.06.2019 of the respondents may kindly be set aside being illegal, unlawful against the surplus policy of 2001 as the petitioner does not fall under the surplus policy and the petitioner may kindly be retained/adjusted against the secretariat cadre born at the strength of establishment department of Civil Secretariat and the seniority/promotion may also be given to the petitioner since the inception of the

employment in the government department with retrospective back benefits as per the judgment titled Tikka Khan & others Vs Syed Muzafar Hussain Shah. **(Copy of Appeal and its judgment dated 14.01.2022 is attached as annexure "A")**

- 2) That accordingly after acquiring the judgment of this Hon'ble court dated 14.01.2022, the petitioner time and again approached the respondents for executing of this Hon'ble Court direction/order, but turned to deaf ear and having no other remedy, the petitioner preferred a execution petition before this Hon'ble court vide execution petition No. 242/2022, wherein, the respondents has made assurance before this Hon'ble court to execute this Hon'ble court judgment in its true letter and spirit being cleared from order dated 10th October, 2022, but unfortunately a drama was staged and till date the needful has not been done. **(Copy of execution petition order dated 10th October 2022 of this Hon'ble court order is annexed as Annex-B)**
- 3) That as expounded above, despite the clear cut order/direction of this Hon'ble court and even the commitment made before this Hon'ble court, the respondents have violated its own assurance made before this Hon'ble court and purposely dilly dallying the matter of the petitioner/appellant even after the lapse of 1 years and 4 months of the judgment of this Hon'ble tribunal. So much so, the respondent has with held the vested fundamental right for the last 10 years.
- 4) That it is also rudimentary to bring into the kind knowledge of this Hon'ble tribunal that despite the clear cut judgment of this Hon'ble court and further order via execution petition No. 242/2022 dated 10th October 2022, the respondents are bent upon/adamant to comply with the direction of this Hon'ble tribunal in favour of the petitioner. So much so, very recently vide respondent letter No. SOE.IV(E&AD) 1-13/2023 dated 08.02.2023 tentative seniority list of Secretariat employee have

been carried out but unfortunately even in the entire list of employees of Assistant BS-16 the name of the petitioner has not been included purposely and in light of the ibid letter the respondents vide further order/Letter No. SO(Policy)E&AD/2-3/General dated Peshawar April 04th 2023 instruction regarding processing of promotion cases and holding of the meeting of departmental promotion committee and the same has been acceded by the commission and direction has been given to the provincial government department to process the same an vice versa for complete detail. **(Copy of letter dated 08.02.2023 along with tentative seniority list of Assistant BS-16 as well as letter No. 04.04.2023 etc are attached as annexure C & D respectively)**

- 5) That the respondent is willfully flouting and violating the judgment and order of this Hon'ble Court, and had made themselves liable to be proceeded against for the contempt of Court.
- 6) That omission of respondents to act upon the order of this Hon'ble tribunal speaks of the fact that respondents has undermined the authority of this Hon'ble tribunal and have not moved even an inch for implementation/execution of the same.
- 7) That the law demands justice may not only be done but it should manifestly be seen to be done, keeping in view the violation of the fundamental right of the petitioner and most importantly the reluctant approach of the respondents is clear from the fact that even they are not complying with the clear cut direction of this Hon'ble tribunal.
- 8) That any other points may be raised at the time of arguments for the best assistance of this Honorable Tribunal.

Prayer:

(5)

It is therefore most humbly prayed by acceptance of instant execution petition, on the basis of expounded subjects, facts the respondents may kindly be directed to comply with the clear cut direction of this Hon'ble tribunal and also humbly submit to take stern action as per the domain of law against the concern respondent by not giving the fundamental vested right of promotion to the petitioner/appellant.

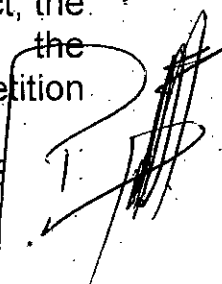

Petitioner/Appellant

Through

Taimur Haider Khan
Advocate, Supreme Court
Taimur Law Associates
Office: Office No.37th, 2nd Floor,
Malik Tower, Pajjagi Road,
Peshawar (0346-9192561)

CERTIFICATE:-

It is stated that previously an execution petition has been preferred by the petitioner, but as expounded in the subject, the respondent are lethargic to comply with, therefore, the petitioner move instant execution/implementation petition before this Hon'ble Tribunal.

ADVOCATE 

6

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

Execution/Implementation petition No. _____/2023

In

Service Appeal No. 1227/2020

Hanif Ur Rehman **Petitioner/Appellant**

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary &
another **Respondents**

AFFIDAVIT

I, Hanif Ur Rehman, Assistant (BPS-16), at Climate Change, Forestry, environment & Wildlife department at Civil Secretariat, Peshawar. do hereby solemnly affirm and declare on oath that the contents of instant **execution/implementation petition** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

Hanif Ur Rehman

DEPONENT

21103-9749311-1

(7) (7)

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

Execution/Implementation petition No. _____/2023

In

Service Appeal No. 1227/2020

Hanif Ur Rehman Petitioner/Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary &
another Respondents

**APPLICATION IN RESPECT TO KINDLY
SUSPEND THE IMPUGNED LETTER NO.
LETTER NO. SOE.IV(E&AD) 1-13/2023 DATED
08.02.2023 & ORDER/LETTER NO.
SO(POLICY)E&AD/2-3/GENERAL DATED
PESHAWAR APRIL 04TH 2023 OF THE
RESPONDENTS, WHEREIN, THE PETITIONER
NAME HAS NOT BEEN ENLISTED, DESPITE
THE CLEAR CUT JUDGMENT OF THIS
HON'BLE TRIBUNAL, KEEPING IN VIEW FOR
THE NEEDFUL/ FUNDAMENTAL VESTED
SINCE 2008 THE PETITIONER IS SEEKING HIS
RIGHT OF PROMOTION ETC AND IF THE
NEEDFUL IS NOT DONE, THE APPLICANT
WILL SUFFER IRREPARABLE LOSSES.**

Respectfully Sheweth:-

1. That the contents of the execution petition may kindly be considered as integral part of this application.

(8)

2. That the case has already been decided in favour of the petitioner and if the impugned Departmental Promotion Committee vides ibid impugned letters is not suspended, the fundamental right of the petitioner will be further violated and would be pampered in further litigation.
3. That the applicant has got a good prima facia case/execution in his favour and has every hope of his success.
4. That if the needful is not done the petitioner will suffer irreparable loss.

It is, therefore humbly prayed that on acceptance of this application, the impugned letter via proceeding in the subject may graciously be suspended.

Through


Applicant/Appellant

Taimur Haider Khan
Advocate, Supreme Court
Taimur Law Associates
Off: 37th, 2nd Floor, Malik
Tower, Peshawar
Cell No.0346-9192561

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

Execution/Implementation petition No. _____/2023
In
Service Appeal No. 1227/2020


Hanif Ur Rehman **Petitioner/Appellant**

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary &
another **Respondents**

AFFIDAVIT

I, Hanif Ur Rehman, Assistant (BPS-16), at Climate Change,
Forestry, environment & Wildlife department at Civil Secretariat,
Peshawar., do hereby solemnly affirm and declare on oath that the
contents of instant **Application** are true and correct to the best of
my knowledge and belief and nothing has been kept concealed from
this Hon'ble Court.



DEPONENT

21103-9749311-1

(7) (10)

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

Execution/Implementation petition No. _____/2023

In

Service Appeal No. 1227/2020

Hanif Ur Rehman Petitioner/Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary &
another Respondents

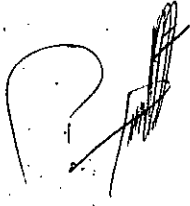
ADDRESSES OF THE PARTIES

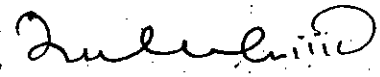

APPELLANT:

Hanif Ur Rehman, Assistant (BPS-16), at Climate Change,
Forestry, environment & Wildlife department at Civil Secretariat,
Peshawar.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Chief
Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary Establishment, Khyber Pakhtunkhwa,
Peshawar.




Petitioner/Appellant
Through 

Taimur Haider Khan
Advocate,
Supreme Court of Pakistan
Taimur Law Associates
Off: 37th, 2nd Floor, Malik
Tower, Peshawar
Cell No.0346-9192561

A

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Anwar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Hanif Ur Rehman

VS

Government of Khyber Pakhtunkhwa & Others.

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| 4. | Copy of the C.O.Cs along with relevant documents | B ✓ | 48-61 |
| 5. | Copy of the impugned order dated: 25.06.2019 vides Notification No. SO(O&M)/E&Ad/3-18/2019 | C ✓ | 62-65 |
| 6. | Copy of the Government Surplus Pool Policy of the year 2001 along with the respondent letter no. Ps/Fs/A, I&C/2019 dated: 22.03.2019 | D ✓ | 66-72 |
| 7. | Copy of the all the Notifications along with relevant documents of the respondent department | E | 73-97 |
| 8. | Copy of W.P No 3704-P/2019 and Judgment dated 05-12-2019 of the Hon'ble Peshawa High Court Peshawar, comments etc | F ✓ | 98-119 → |
| 9. | Copy of the Order dated 04-08-2020 In C.P No. 881/2020 of the apex Court of Pakistan | G | 120-133 |
| 10. | Copy of the unjustifiable office letter NO SO(B & A)FD/NMAS/4-1/2019/SNE/185 DATED 11-06-2020 | H | 134-154 |
| 11. | Wakalatnama | | 155 ✓ |

1
2

Through Appellant

Taimur Haider Khan
Advocate, High Court
Taimur Law Associates
Room No.37th, 2nd Floor,
Malik Tower, Pajjagi
Road, Peshawar
Cell No.0346-9192561

Office:

Taimur Haider Khan
Advocate Supreme Court
Attested

12

12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service Appeal No: _____/2020

Hanif Ur Rehman, Assistant (BPS-16), Directorate of
Prosecution Khyber Pakhtunkhwa.

....Appellant

VERSUS

- 1) Government of Khyber Pakhtunkhwa through its chief
Secretary at Civil Secretariat Peshawar.
- 2) Government of Khyber Pakhtunkhwa through
Secretary, Finance Department at civil Secretariat
Peshawar:

....Respondents

Tahir Haider Khan
Advocate Supreme Court
Attended

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974, (AS PER THE ORDER DATED
04-08-2020 OF THE AUGUST SUPREME
COURT OF PAKISTAN) AGAINST THE
UNJUSTIFIABLE AND IMPUGNED
NOTIFICATION NO.SO(O&M)/E&AD/3-
18/2019 DATED 25-06-2019, WHEREBY
THE APPELLANT HAS BEEN PLACED
SURPLUS AS PER THE SURPLUS POOL
POLICY AND LATER ON DURING THE

13

2

PENDENCY OF W.P NO 3704-P/2019
HAVE NOT ONLY ADJUSTED IN OTHER
DEPARTMENTS ILLEGALLY BUT THE
APPELLANT' SENIORITY & PROMOTION
HAS ALSO BEEN HIGHLY AFFECTED IN
ORDER TO FAVOR THE BLUE EYED
PEOPLE VIA POSTING NOTIFICATION
DATED 17-06-2020.

DESPITE THE FACT THE HON'BLE
PESHAWAR HIGH COURT PESHAWAR
IN WP NO 3704-P/2019 VIDE
JUDGMENT 05-12-2019 VERY
CATEGORICALLY DIRECTED THE
RESPONDENTS TO TREAT/ DETERMINE
THE SENIORITY OF THE APPELLANT IN
THE RATIO AS CONTAINED IN THE
JUDGMENT TITLED "TIKKA KHAN &
OTHERS VS SYED MUZAFAR HUSSAIN
SHAH & OTHER (2018 SCMR 332) AS
WELL AS THE SAME FACT HAS ALSO
BEEN CATEGORICALLY ORDERED BY
THE LARGER BENCH OF HON'BLE
PESHAWAR HIGH COURT PESHAWAR
IN WP 969/2010 VIDE JUDGMENT
DATED 07-11-2013 IN FAVOR OF THE
APPELLANT BUT UNFORTUNATELY THE
RESPONDENTS ARE RELUCTANT TO DO
SO (TO GIVE SENIORITY AND
PROMOTION FROM THE DATE OF
REGULAR APPOINTMENT DT:01.07.2008.

Taimur Haider Khan
Advocate Supreme Court
Attested

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3

Respectfully Submitted:-

- 1) That the appellant was initially appointed in the Fata Secretariat 01.12.2004 and since the appointment, the appellant, earned good reputation amongst the officers. Due to the pain staking and sedulous hardworking, ever tried to keep the morale of the department high and during the entire service of more than 16 years is having unblemished service carrier.
- 2) That for the fundamental right, the appellant has preferred series of application to the competent authority but of no avail, finally for the regularization, put up the matter before the Honorable Peshawar High Court, Peshawar and the Hon'ble Peshawar High court has been pleased to allow the writ petition No.969 of 2010 vide judgment dated: 30.11.2013. The respondents have challenged the matter before the Supreme Court of Pakistan vides CPLA No.29-P of 2013 dated: 30.05.2013, the apex court has been pleased remanded back to the Honorable Peshawar high Court, Peshawar in order to dispense justice in its true letter and spirit. Accordingly, the Honorable Peshawar High Court Peshawar, larger bench has been pleased to allow the appellant writ petition No. vide detail judgment dated: 07.11.2013 and besides other remedy, the appellant along with hundreds of other employees of the erstwhile FATA Secretariat on the same footing has been regularized from

Taimur Haider Khan
 Advocate Supreme Court
 Attested

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01.07.2008 and vice versa for the complete detail. (Copy of the aforesaid whole proceedings, apex court decision along with appointment/regularization orders etc is annexed as annexure "A").

3) That the stroke of misfortune hit the appellant, when the respondents were reluctant to comply with the clear cut order/judgments of the Hon'ble Peshawar High Court, Peshawar. The appellant has tried his level best even from pillar to post via series of application but of no avail and finally having no other option but filed contempt of court petition. Though some portion/remedy of the judgment was redressed/complied with but unfortunately respondents were reluctant to formulate the service structure of the appellant as well as promotion and seniority were not determined. As the matter pertains to the year 2013 and despite the commitment made before Honorable Peshawar High Court, Peshawar, the respondents mendaciously were lethargic to comply with the clear order of the Honorable Peshawar High Court, Peshawar and after the lapse of further 03 years, the appellant has again filed another C.O.C via C.M No. 667/2017 in C.O.C No. 178-P/2014 in W.P No.969/2010. (Copy of the C.O.Cs along with relevant documents is annexed annexure "B").

4) That it is rudimentary to mention here, that since 2013, the appellant vested right have been violated

Taimur Haider Khan
Advocate Supreme Court
Attested

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and in such a doldrums sort of situation, the appellant was shocked and astonished to know that the respondent vide illegal, unjustifiable and unlawful Notification dated: 25.06.2019 has placed the appellant along with other employees, in the Surplus Pool and declared them as Surplus. (Copy of the impugned notification dated: 25.06.2019 vides Notification No. SO (O&M)/E&Ad/3-18/2019 is annexed as annexure "C").

5) That the impugned order is not only illegal, unlawful against the surplus pool policy and tantamount to quench the thirst by the respondents as already 03 different C.O.Cs have been filed against the respondents by not complying with the clear cut judgment of the apex court dated: 30.05.2013 in CP No.29-P of 2013 as well as the Honorable Peshawar High Court Peshawar (larger bench) judgment dated: 07.11.2013 in W.P No.969/2010 being passed in favor of the present appellant.

6) That after the 25th amendment in the constitution of Pakistan 1973, the respondents has declared the appellant as surplus despite the fact the appellant has never opted to be placed surplus nor the option has been taken from the appellant, which is mandatory as per section 5 (a) of the government surplus pool policy of the year 2001 (8th June, 2001) as amended in 2006 as well as the unwillingness of the appellant is also cleared from the respondent letter No. PS/FS/A,1&C/2019 dated: 22.03.2019

Attorney General
Advocate Supreme Court
Attended

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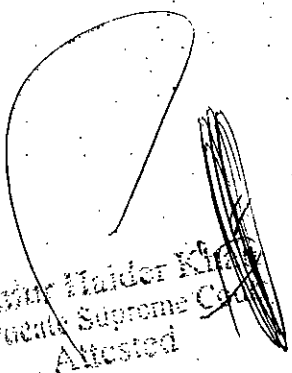
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appeal
X

"Information report on the protest launched by merged areas secretariat employees/appellant on 22.03.2019" whereby the appellant very categorically contended that they should not be placed in the surplus pool as their matured service of about 15 years may spoil and lose. (Copy of the Government Surplus Pool Policy of the year 2001 along with the respondent letter no. Ps/Fs/A, I&C/2019 dated: 22.03.2019 is annexed as annexure "D").

- 7) That the illegal and untoward act of the respondent is also cleared from the notifications i.e. No. SO(E-1)/E&AD/9-126/2019 DATED: 08.01.2019, the erstwhile Fata secretariat departments and directorates have been shifted and placed under the administrative supervision and controller of the Khyber Pakhtunkhwa government department in order to ensure better coordination and seamless transaction. besides billions of rupees have been given by the government for the merged/erstwhile Fata secretariat departments etc (for present appellant/posts) but unfortunately despite of having same cadre of posts (appellant) at civil secretariat, the respondents have carried out the unjustifiable, illegal and unlawful impugned order dated: 25.06.2019 which is not only the violation of the apex court/high Court judgment but the same will further violate the fundamental right of the appellant being enshrined in the constitution of Pakistan, 1973, will seriously affect the promotion /seniority,

in part


Advocate Haidar Khan
Advocate Supreme Court
Attested

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so much so, the appellant was extremely shocked to know and put in doldrums by the respondent, of having the stance, if the same impugned Notification is not accepted, the consequences will be grimed and as such the impugned order has further aggravated the agonies of the appellant and seriously traumatized their families. (Copy of the all the Notifications along with relevant documents of the respondent department are annexed as annexure "E").

- 8) That the mendacious approach and clear discrimination of the respondents is cleared from the Notification No. SO(E)P&D/19-37/PPS/2018. Dated: 22.03.2019, whereby the employees of erstwhile Fata Secretariat have not been placed Surplus "In Pursuance of Order of Peshawar High Court, Peshawar dated: 07.11.2018 in writ petition No.3722-P/2016 titled Muhammad Masood Afridi & others Versus Government of Khyber Pakhtunkhwa through Chief Secretary & others and in light of decision of the meeting held on 15.11.2018 under the Chairmanship of Chief Secretary, Khyber Pakhtunkhwa, the Competent Authority is pleased to include the following posts in BS-17 and above of erstwhile Agency Planning Cells P&D Department, Merged Areas (Tribal Districts) in the schedule of Provincial Planning Service (PPS) cadre and the incumbents as Provincial Planning Service Officers in their respective grades, with immediate effect, in the best public interest". (Copy of the

Tahir Nadeem Khan
Advocate Supreme Court
Attested

Notification dated: 22.03.2019 is annexed as annexure "E").

9) that having no other option, the appellant along with other employee, have knocked the door of the Hon'ble Peshawar High Court Peshawar but due to the pendency of the same, mendaciously, the respondents have adjusted the appellant in other departments and after filing the comments, finally the Hon'ble Peshawar High Court vide judgment dated 05-12-2019 in W.P No 3704-P/2019 has been pleased to order the W.P as infructuous in light of article 212 of the constitution of Pakistan, 1973 via jurisdiction and in Para No 5 "Needless to mention and we expect that keeping in view the ratio as contained in the judgment titled TIKKA KHAN AND OTHERS VS. SYED MUZAFFAR HUSSAIN SHAH AND OTHERS (2018 SCMR 332), the seniority would be determined accordingly". (Copy of W.P No 3704-P/2019 and Judgment dated 05-12-2019 of the Hon'ble Peshawar High Court Peshawar, comments etc are annexed is annexure "F").

10) That feeling aggrieved from the Hon'ble Peshawar High Court Peshawar ibid Judgment; the appellant along with other employees has challenged the same before the apex Court of Pakistan and vide order dated 04-08-2020 in CP NO. 881/2020 the apex Court has been pleased to direct the appellant to redress the grievance before this Hon'ble service

Talibur Rehman Khan
Advocate Supreme Court
Attested

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tribunal (C.P dismissed as not pressed) and hence the instant appeal as per the apex court decision before this Hon'ble Court. (Copy of the Order dated 04-08-2020 in C.P No. 881/2020 of the apex Court of Pakistan is annexed as annexure "G").

11) That the mendacious and biased approach of the respondent is cleared from the further unjustifiable office letter NO SO(B & A)FD/NMAS/4-1/2019/SNE/185 DATED 11-06-2020. Whereby in order to favor the blue eyed people on the same post of the appellant, the respondents has shifted/ created same post in the civil Secretariat for their near and dears. Suffice it to say the same unjustifiable office letter has also been challenge in C.M.A No. 4608/2020 in C.P.L.A 861/2020 before the August Supreme Court of Pakistan and hence the same is also required to be set aside. (Copy of the unjustifiable office letter NO SO(B & A)FD/NMAS/4-1/2019/SNE/185 DATED 11-06-2020 is annexed as annexure "H")

12) That the law demands, justice may not only be done but it should manifestly be seemed to be done, keeping in view the unjustifiable order of the respondents. In such a scenario, if the same is not set-aside, the appellant will be further aggravated and will suffer irreparable losses.

13) That the expounded subjects, facts and circumstances may also be considered as ground of the instant writ petition and any other

Talimat Haider Khan
Advocate Supreme Court
Attested

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point/documents may be raised/ provided at the time of arguments for the best assistance of this Honorable Court.

PRAYER:

IT IS, THEREFORE, MOST HUMBLY PRAYED THAT BY ACCEPTANCE OF INSTANT APPEAL ON THE BASIS OF EXPOUNDED SUBJECT, FACTS AND CIRCUMSTANCES THE UNJUSTIFIABLE AND IMPUGNED NOTIFICATION NO.SO(O&M)/E&AD/3-18/2019 DATED: 25-06-2019 OF THE RESPONDENTS MAY KINDLY BE SET-ASIDE BEING ILLEGAL, UNLAWFUL, AGAINST THE SURPLUS POOL POLICY OF THE GOVERNMENT OF 2001 (AS THE APPELLANT DOES NOT FALL UNDER THE SURPLUS POLICY) AND THE VIOLATION OF THE FUNDAMENTAL VESTED RIGHT OF THE APPELLANT AND THE APPELLANT MAY KINDLY BE RETAINED /ADJUSTED AGAINST THE SECRETARIAT CADRE BORN AT THE STRENGTH OF ESTABLISHMENT DEPARTMENT OF CIVIL SECRETARIAT.

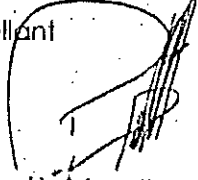
SIMILARLY THE SENIORITY/ PROMOTION MAY ALSO BE GIVEN TO THE APPELLANT SINCE THE INCEPTION OF THE EMPLOYMENT IN THE GOVERNMENT DEPARTMENT WITH


Talmer Hardesty
Advocate Supreme Court
Attested

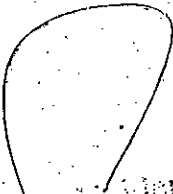

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RETROSPECTIVE BACK BENEFIT AS PER THE JUDGMENT TITLED "TIKKA KHAN & OTHERS VS SYED MUZAFAR HUSSAIN SHAH & OTHER (2018 SCMR 332) AS WELL AS IN THE LIGHT OF THE LARGER BENCH OF HON'BLE PESHAWAR HIGH COURT PESHAWAR IN W.P 969/2010 VIDE JUDGMENT DATED 07-11-2013 IN FAVOR OF THE APPELLANT FOR THE BEST ADMINISTRATION OF JUSTICE AND FAIR PLAY.


Any other relief deemed appropriate in the circumstances of the case may kindly granted in favor of appellant.

Appellant
Through 

Taimur Haider Khan
Advocate, High Court
& 
Malak Sajid Khan
Taimur Law Associates
Off: 37th, 2nd Floor, Malik
Tower, Peshawar
Cell No.0346-9192561


Taimur Haider Khan
Advocate Supreme Court
Attested 

Certificate: It is certify that no similar appeal on the above subject has earlier been filed before this Honorable Tribunal.


Advocate

Judgment



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No: 1227/2020

Date of Institution 21.09.2020

Date of Decision 14.01.2022

Hanif Ur Rehman, Assistant (BPS-16), Directorate of Prosecution Khyber Pakhtunkhwa. (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through its Chief Secretary at Civil Secretariat Peshawar and others. (Respondents)

Syed Yahya Zahid Gillani, Taimur Haider Khan & Ali Gohar Durrani, Advocates

... For Appellants

Muhammad Adeel Butt, Additional Advocate General

... For respondents

AHMAD SULTAN TAREEN ...
ATIQU-UR-REHMAN WAZIR ...

CHAIRMAN
MEMBER (EXECUTIVE)

JUDGMENT

ATIQU-UR-REHMAN WAZIR MEMBER (E):- This single judgment

shall dispose of the instant service appeal as well as the following connected service appeals, as common question of law and facts are involved therein:-

1. 1228/2020 titled Zubair Shah
2. 1229/2020 titled Farooq Khan
3. 1230/2020 titled Muhammad Amjid Ayaz
4. 1231/2020 titled Qaiser Khan
- ✓ 5. 1232/2020 titled Ashiq Hussain
6. 1233/2020 titled Shoukat Khan
7. 1244/2020 titled Haseeb Zeb

Taimur Haider Khan
Advocate Supreme Court
Attested

ATTESTED

CHAIRMAN
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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8. 1245/2020 titled Muhammad Zahir Shah

✓ 9. 11125/2020 titled Zahid Khan

10. 11126/2020 titled Touseef Iqbal

02. Brief facts of the case are that the appellant was initially appointed as Assistant (BPS-11) on contract basis in Ex-FATA Secretariat vide order dated 01-12-2004. His services were regularized by the order of Peshawar High Court vide judgment dated 07-11-2013 with effect from 01-07-2008 in compliance with cabinet decision dated 29-08-2008. Regularization of the appellant was delayed by the respondents for quite longer and in the meanwhile, in the wake of merger of Ex-FATA with the Province, the appellant alongwith others were declared surplus vide order dated 25-06-2019. Feeling aggrieved, the appellant alongwith others filed writ petition No 3704-P/2019 in Peshawar High Court, but in the meanwhile the appellant alongwith others were adjusted in various directorates, hence the High Court vide judgment dated 05-12-2019 declared the petition as infructuous, which was challenged by the appellants in the supreme court of Pakistan and the supreme court remanded their case to this Tribunal vide order dated 04-08-2020 in CP No. 881/2020. Prayers of the appellants are that the impugned order dated 25-06-2019 may be set aside and the appellants may be retained/adjusted against the secretariat cadre borne at the strength of Establishment & Administration Department of Civil Secretariat. Similarly seniority/promotion may also be given to the appellants since the inception of their employment in the government department with back benefits as per judgment titled Tikka Khan & others Vs Syed Muzafar Hussain Shah & others (2018 SCMR 332) as well as in the light of judgment of larger bench of high court in Writ Petition No. 696/2010 dated 07-11-2013.

03. Learned counsel for the appellants has contended that the appellants has not been treated in accordance with law, hence their rights secured under the Constitution has badly been violated; that the impugned order has not been

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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passed in accordance with law, therefore is not tenable and liable to be set aside; that the appellants were appointed in Ex-FATA Secretariat on contract basis vide order dated 01-12-2004 and in compliance with Federal Government decision dated 29-08-2008 and in pursuance of judgment of Peshawar High Court dated 07-11-2013, their services were regularized with effect from 01-07-2008 and the appellants were placed at the strength of Administration Department of Ex-FATA Secretariat; that the appellants were discriminated to the effect that they were placed in surplus pool vide order dated 25-06-2019, whereas services of similarly placed employees of all the departments were transferred to their respective departments in Provincial Government; that placing the appellants in surplus pool was not only illegal but contrary to the surplus pool policy, as the appellants never opted to be placed in surplus pool as per section-5 (a) of the Surplus Pool Policy of 2001 as amended in 2006 as well as the unwillingness of the appellants is also clear from the respondents letter dated 22-03-2019; that by doing so, the mature service of almost fifteen years may spoil and go in waste; that the illegal and untoward act of the respondents is also evident from the notification dated 08-01-2019, where the erstwhile FATA Secretariat departments and directorates have been shifted and placed under the administrative control of Khyber Pakhtunkhwa Government Departments, whereas the appellants were declared surplus; that billion of rupees have been granted by the Federal Government for merged/erstwhile FATA Secretariat departments but unfortunately despite having same cadre of posts at civil secretariat, the respondents have carried out the unjustifiable, illegal and unlawful impugned order dated 25-06-2019, which is not only the violation of the Apex Court judgment, but the same will also violate the fundamental rights of the appellants being enshrined in the Constitution of Pakistan, will seriously affect the promotion/seniority of the appellants; that discriminatory approach of the respondents is evident from the notification dated 22-03-2019, whereby other employees of Ex-FATA were not placed in surplus pool but Ex-FATA Planning Cell of P&D was placed and merged into Provincial

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EXAMINER
Khyber Pakhtunkhwa
Secretariat

P&D Department; that declaring the appellants surplus and subsequently their adjustment in various departments/directorates are illegal, which however were required to be placed at the strength of Establishment & Administration department; that as per judgment of the High Court, seniority/promotions of the appellants are required to be dealt with in accordance with the judgment titled Tikka Khan Vs Syed Muzafar (2018 SCMR 332), but the respondents deliberately and with malafide declared them surplus, which is detrimental to the interests of the appellants in terms of monetary loss as well as seniority/promotion, hence interference of this tribunal would be warranted in case of the appellants.

04. Learned Additional Advocate General for the respondents has contended that the appellants has been treated at par with the law in vogue i.e. under section-11(A) of the Civil Servant Act, 1973 and the surplus pool policy of the provincial government framed thereunder; that proviso under Para-6 of the surplus pool policy states that in case the officer/officials declines to be adjusted/absorbed in the above manner in accordance with the priority fixed as per his seniority in the integrated list, he shall loose the facility/right of adjustment/absorption and would be required to opt for pre-mature retirement from government service provided that if he does not fulfill the requisite qualifying service for pre-mature retirement, he may be compulsory retired from service by the competent authority, however in the instant case, no affidavit is forthcoming to the effect that the appellant refused to be absorbed/adjusted under the surplus pool policy of the government; that the appellants were ministerial staff of ex-FATA Secretariat, therefore they were treated under section-11(a) of the Civil Servant Act, 1973; that so far as the issue of inclusion of posts in BPS-17 and above of erstwhile agency planning cells, P&D Department merged areas secretariat is concerned, they were planning cadre employees, hence they were adjusted in the relevant cadre of the provincial government; that after merger of erstwhile FATA with the Province, the Finance Department vide

Mar Asad Khan
 v. *Syed Muzafar*
 Appellate Supreme Court
 Islamabad

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 Civil Service Tribunal
 Islamabad

order dated 21-11-2019 and 11-06-2020 created posts in the administrative departments in pursuance of request of establishment department, which were not meant for blue eyed persons as is alleged in the appeal; that the appellants has been treated in accordance with law, hence their appeals being devoid of merit may be dismissed.

05. We have heard learned counsel for the parties and have perused the record.

06. Before embarking upon the issue in hand, it would be appropriate to explain the background of the case. Record reveals that in 2003, the federal government created 157 regular posts for the erstwhile FATA Secretariat, against which 117 employees including the appellants were appointed on contract basis in 2004 after fulfilling all the codal formalities. Contract of such employees was renewed from time to time by issuing office orders and to this effect; the final extension was accorded for a further period of one year with effect from 03-12-2009. In the meanwhile, the federal government decided and issued instructions dated 29-08-2008 that all those employees working on contract against the posts from BPS-1 to 15 shall be regularized and decision of cabinet would be applicable to contract employees working in ex-FATA Secretariat through SAFRON Division for regularization of contract appointments in respect of contract employees working in FATA. In pursuance of the directives, the appellants submitted applications for regularization of their appointments as per cabinet decision, but such employees were not regularized under the pleas that vide notification dated 21-10-2008 and in terms of the centrally administered tribal areas (employees status order 1972 President Oder No. 13 of 1972), the employees working in FATA shall, from the appointed day, be the employees of the provincial government on deputation to the Federal Government without deputation allowance, hence they are not entitled to be regularized under the policy decision dated 29-08-2008.

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Chief Justice
Federal Shariat Court
Islamabad

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Service Tribunal
Peshawar

07. In 2009, the provincial government promulgated regularization of service Act, 2009 and in pursuance, the appellants approached the additional chief secretary ex-FATA for regularization of their services accordingly, but no action was taken on their requests, hence the appellants filed writ petition No 969/2010 for regularization of their services, which was allowed vide judgment dated 30-11-2011 and services of the appellants were regularized under the regularization Act, 2009, against which the respondents filed civil appeal No 29-P/2013 and the Supreme Court remanded the case to the High Court Peshawar with direction to re-examine the case and the Writ Petition No 969/2010 shall be deemed to be pending. A three member bench of the Peshawar High Court decided the issue vide judgment dated 07-11-2013 in WP No 969/2010 and services of the appellants were regularized and the respondents were given three months time to prepare service structure so as to regulate their permanent employment in ex-FATA Secretariat vis-à-vis their emoluments, promotions, retirement benefits and inter-se-seniority with further directions to create a task force to achieve the objectives highlighted above. The respondents however, delayed their regularization, hence they filed COC No. 178-P/2014 and in compliance, the respondents submitted order dated 13-06-2014, whereby services of the appellants were regularized vide order dated 13-06-2014 with effect from 01-07-2008 as well as a task force committee had been constituted by Ex-FATA Secretariat vide order dated 14-10-2014 for preparation of service structure of such employees and sought time for preparation of service rules. The appellants again filed CM No. 182-P/2016 with IR in COC No 178-P/2014 in WP No 969/2010, where the learned Additional Advocate General alongwith departmental representative produced letter dated 28-10-2016, whereby service rules for the secretariat cadre employees of Ex-FATA Secretariat had been shown to be formulated and had been sent to secretary SAFRAN for approval, hence vide judgment dated 08-09-2016, Secretary SAFRAN was directed to finalize the matter within one month, but the respondents instead of doing the needful

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Service Tribunal
Peshawar

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declared all the 117 employees including the appellants as surplus vide order dated 25-06-2019, against which the appellants filed Writ Petition No. 3704-P/2019 for declaring the impugned order as set aside and retaining the appellants in the Civil Secretariat of establishment and administration department having the similar cadre of post of the rest of the civil secretariat employees.

08. During the course of hearing, the respondents produced copies of notifications dated 19-07-2019 and 22-07-2019 that such employees had been adjusted/absorbed in various departments. The High Court vide judgment dated 05-12-2019 observed that after their absorption, now they are regular employees of the provincial government and would be treated as such for all intent and purposes including their seniority and so far as their other grievance regarding their retention in civil secretariat is concerned, being civil servants, it would involve deeper appreciation of the vires of the policy, which have not been impugned in the writ petition and in case the appellants still feel aggrieved regarding any matter that could not be legally within the framework of the said policy, they would be legally bound by the terms and conditions of service and in view of bar contained in Article 212 of the Constitution, this court could not embark upon to entertain the same. Needless to mention and we expect that keeping in view the ratio as contained in the judgment titled Tikka Khan and others Vs Syed Muzafar Hussain Shah and others (2018 SCMR 332), the seniority would be determined accordingly, hence the petition was declared as infructuous and was dismissed as such. Against the judgment of High Court, the appellants filed CPLA No 881/2020 in the Supreme Court of Pakistan, which was disposed of vide judgment dated 04-08-2020 on the terms that the petitioners should approach the service tribunal, as the issue being terms and condition of their service, does fall within the jurisdiction of service tribunal, hence the appellant filed the instant service appeal.

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Supreme Court of Pakistan
Service Tribunal
Peshawar

09. Main concern of the appellants in the instant service appeal is that in the first place, declaring them surplus is illegal, as they were serving against regular posts in administration department Ex-FATA, hence their services were required to be transferred to Establishment & Administration Department of the provincial government like other departments of Ex-FATA were merged in their respective department. Their second stance is that by declaring them surplus and their subsequent adjustment in directorates affected them in monetary terms as well as their seniority/promotion also affected being placed at the bottom of the seniority line.

10. In view of the foregoing explanation, in the first place, it would be appropriate to count the discriminatory behaviors of the respondents with the appellants, due to which the appellants spent almost twelve years in protracted litigation right from 2008 till date. The appellants were appointed on contract basis after fulfilling all the codal formalities by FATA Secretariat, administration wing but their services were not regularized, whereas similarly appointed persons by the same office with the same terms and conditions vide appointments orders dated 08-10-2004, were regularized vide order dated 04-04-2009. Similarly a batch of another 23 persons appointed on contract were regularized vide order dated 04-09-2009 and still a batch of another 28 persons were regularized vide order dated 17-03-2009; hence the appellants were discriminated in regularization of their services without any valid reason. In order to regularize their services, the appellants repeatedly requested the respondents to consider them at par with those, who were regularized and finally they submitted applications for implementation of the decision dated 29-08-2008 of the federal government, where by all those employees working in FATA on contract were ordered to be regularized, but their requests were declined under the plea that by virtue of presidential order as discussed above, they are employees of provincial government and only on deputation to FATA but without deputation allowances.

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 Khyber Pakhtunkhwa
 Service Tribunal
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hence they cannot be regularized, the fact however remains that they were not employee of provincial government and were appointed by administration department of Ex-FATA Secretariat, but due to malafide of the respondents, they were repeatedly refused regularization, which however was not warranted. In the meanwhile, the provincial government promulgated Regularization Act, 2009, by virtue of which all the contract employees were regularized, but the appellant were again refused regularization, but with no plausible reason, hence they were again discriminated and compelling them to file Writ Petition in Peshawar High Court, which was allowed vide judgment dated 30-11-2011 without any debate, as the respondents had already declared them as provincial employees and there was no reason whatsoever to refuse such regularization, but the respondent instead of their regularization, filed CPLA in the Supreme Court of Pakistan against such decision, which again was an act of discrimination and malafide, where the respondents had taken a plea that the High Court had allowed regularization under the regularization Act, 2009 but did not discuss their regularization under the policy of Federal Government laid down in the office memorandum issued by the cabinet secretary on 29-08-2008 directing the regularization of services of contractual employees working in FATA, hence the Supreme Court remanded their case to High Court to examine this aspect as well. A three member bench of High Court heard the arguments, where the respondents took a U turn and agreed to the point that the appellants had been discriminated and they will be regularized but sought time for creation of posts and to draw service structure for these and other employees to regulate their permanent employment. The three member bench of the High Court had taken a serious view of the unessential technicalities to block the way of the appellants, who too are entitled to the same relief and advised the respondents that the petitioners are suffering and are in trouble besides mental agony, hence such regularization was allowed on the basis of Federal Government decision dated 29-08-2008 and the appellants were declared as civil servants of the FATA

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Secretariat and not of the provincial government. In a manner, the appellants were wrongly refused their right of regularization under the Federal Government Policy, which was conceded by the respondents before three member's bench, but the appellants suffered for years for a single wrong refusal of the respondents, who put the matter on the back burner and on the ground of sheer technicalities thwarted the process despite the repeated direction of the federal government as well as of the judgment of the courts. Finally, Services of the appellants were very unwillingly regularized in 2014 with effect from 2008 and that too after contempt of court proceedings. Judgment of the three member bench is very clear and by virtue of such judgment, the respondents were required to regularize them in the first place and to own them as their own employees borne on the strength of establishment and administration department of FATA Secretariat, but step-motherly behavior of the respondents continued unabated, as neither posts were created for them nor service rules were framed for them as were committed by the respondents before the High Court and such commitments are part of the judgment dated 07-11-2013 of Peshawar High Court. In the wake of 25th Constitutional amendments and upon merger of FATA Secretariat into Provincial Secretariat, all the departments' alongwith staff were merged into provincial departments. Placed on record is notification dated 08-01-2019, where P&D Department of FATA Secretariat was handed over to provincial P&D Department and law & order department merged into Home Department vide notification dated 16-01-2019, Finance department merged into provincial Finance department vide notification dated 24-01-2019, education department vide order dated 24-01-2019 and similarly all other department like Zakat & Usher Department, Population Welfare Department, Industries, Technical Education, Minerals, Road & Infrastructure, Agriculture, Forests, Irrigation, Sports, FDMA and others were merged into respective Provincial Departments, but the appellants being employees of the administration department of ex-FATA were not merged into Provincial Establishment & Administration Department, rather they were

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 Service Tribunal
 Peshawar

declared surplus, which was discriminatory and based on malafide, as there was no reason for declaring the appellants as surplus, as total strength of FATA Secretariat from BPS-1 to 21 were 56983 of the civil administration against which employees of provincial government, defunct FATA DC, employees appointed by FATA Secretariat, line directorates and autonomous bodies etc were included, amongst which the number of 117 employees including the appellants were granted amount of Rs. 25505.00 million for smooth transition of the employees as well as departments to provincial departments and to this effect a summary was submitted by the provincial government to the Federal Government, which was accepted and vide notification dated 09-04-2019, provincial government was asked to ensure payment of salaries and other obligatory expenses, including terminal benefits as well of the employees against the regular sanctioned 56983 posts of the administrative departments/attached directorates/field formations of erstwhile FATA, which shows that the appellants were also working against sanctioned posts and they were required to be smoothly merged with the establishment and administration department of provincial government, but to their utter dismay, they were declared as surplus inspite of the fact that they were posted against sanctioned posts and declaring them surplus, was no more than malafide of the respondents. Another discriminatory behavior of the respondents can be seen, when a total of 235 posts were created vide order dated 11-06-2020 in administrative departments i.e. Finance, home, Local Government, Health, Environment, Information, Agriculture, Irrigation, Mineral and Education Departments for adjustment of the staff of the respective departments of ex-FATA; but here again the appellants were discriminated and no post was created for them in Establishment & Administration Department and they were declared surplus and later on were adjusted in various directorates, which was detrimental to their rights in terms of monetary benefits, as the allowances admissible to them in their new places of adjustment were less than the one admissible in civil secretariat. Moreover, their seniority was also affected

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 Services Commission
 Peshawar

as they were placed at the bottom of seniority and their promotions, as the appellant appointed as Assistant is still working as Assistant in 2022, are the factors, which cannot be ignored and which shows that injustice has been done to the appellants. Needless to mention that the respondents failed to appreciate that the Surplus Pool Policy-2001 did not apply to the appellants since the same was specifically made and meant for dealing with the transition of district system and resultant re-structuring of governmental offices under the devolution of powers from provincial to local governments as such, the appellants service in erstwhile FATA Secretariat (now merged area secretariat) had no nexus whatsoever with the same, as neither any department was abolished nor any post, hence the surplus pool policy applied on them was totally illegal. Moreover the concerned learned counsel for the appellants had added to their miseries by contesting their cases in wrong forums and to this effect, the supreme court of Pakistan in their case in civil petition No. 881/2020 had also noticed that the petitioners being pursuing their remedy before the wrong forum, had wasted much of their time and the service Tribunal shall justly and sympathetically consider the question of delay in accordance with law. To this effect we feel that the delay occurred due to wastage of time before wrong forums, but the appellants continuously contested their case without any break for getting justice. We feel that their case was already spoiled by the respondents due to sheer technicalities and without touching merit of the case. The apex court is very clear on the point of limitation that cases should be considered on merit and mere technicalities including limitation shall not debar the appellants from the rights accrued to them. In the instant case, the appellants has a strong case on merit, hence we are inclined to condone the delay occurred due to the reason mentioned above.

11. We are of the considered opinion that the appellants has not been treated in accordance with law, as they were employees of administration department of the ex-FATA and such stance was accepted by the respondents in their comment

Tahir Haider Khan
Advocate Supreme Court
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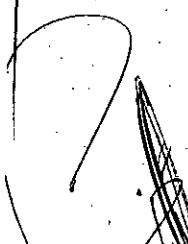
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Khyber Pak
North West
Frontier


submitted to the High Court and the High Court vide judgment dated 07-11-2013 declared them civil servants and employees of administration department of ex-FATA Secretariat and regularized their services against sanctioned posts, despite they were declared surplus. They were discriminated by not transferring their services to the establishment and administration department of provincial government on the analogy of other employees transferred to their respective departments in provincial government and in case of non-availability of post, Finance department was required to create posts in Establishment & Administration Department on the analogy of creation of posts in other Administrative Departments as the Federal Government had granted amount of Rs. 25505 million for a total strength of 56983 posts including the posts of the appellants and declaring them surplus was unlawful and based on malafide and on this score alone the impugned order is liable to be set aside. The correct course would have been to create the same number of vacancies in their respective department i.e. Establishment & Administrative Department and to post them in their own department and issues of their seniority/promotion was required to be settled in accordance with the prevailing law and rule.

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12. We have observed that grave injustice has been meted out to the appellants in the sense that after contesting for longer for their regularization and finally after getting regularized, they were still deprived of the service structure/rules and creation of posts despite the repeated directions of the three member bench of Peshawar High Court in its judgment dated 07-11-2013 passed in Writ Petition No. 969/2010. The same directions has still not been implemented and the matter was made worse when impugned order of placing them in surplus pool was passed, which directly affected their seniority and the future career of the appellants after putting in 18 years of service and half of their service has already been wasted in litigation.


 Faizur Haid Khan
 Adv. to Supreme Court
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 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

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13. In view of the foregoing discussion, the instant appeal alongwith connected service appeals are accepted. The impugned order dated 25-06-2019 is set aside with direction to the respondents to adjust the appellants in their respective department i.e. Establishment & Administration Department Khyber Pakhtunkhwa against their respective posts and in case of non-availability of posts, the same shall be created for the appellants on the same manner, as were created for other Administrative Departments vide Finance Department notification dated 11-06-2020. Upon their adjustment in their respective department, they are held entitled to all consequential benefits. The issue of their seniority/promotion shall be dealt with in accordance with the provisions contained in Civil Servant Act, 1973 and Khyber Pakhtunkhwa Government Servants (Appointment, Promotion & Transfer) Rules, 1989, particularly Section-17(3) of Khyber Pakhtunkhwa Government Servants (Appointment Promotion & Transfer) Rules, 1989. Needless to mention and is expected that in view of the ratio as contained in the judgment titled Tikka Khan and others Vs Syed Muzafar Hussain Shah and others (2018 SCMR 332), the seniority would be determined accordingly. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
14.01.2022

Justice Khairuddin Khan
Justice Supreme Court
Justice

(Signature)
(AHMAD SULTAN TAREEN)
CHAIRMAN

(Signature)
(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

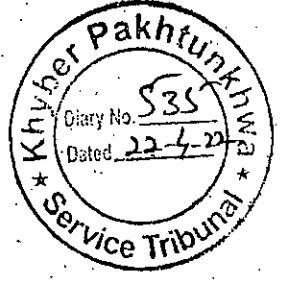
Date of Presentation of Application 01-03-22
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 Date of Delivery of Copy 01-03-22

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 MEMBER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

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



Execution Petition No. 242 /2022
In Service Appeal No.1227/2020

Hnaif Ur Rehman, Assistant (BPS-16),
Directorate of Prosecution Khyber Pakhtunkhwa.

PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through its Chief Secretary at Civil Secretariat Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Finance Department at Civil Secretariat Peshawar.

RESPONDENTS

.....
**EXECUTION PETITION FOR DIRECTING THE
RESPONDENTS TO IMPLEMENT THE
JUDGMENT DATED 14.01.2022 OF THIS
HONOURABLE TRIBUNAL IN LETTER AND
SPIRIT.**
.....

RESPECTFULLY SHEWETH:

1. That the petitioner has filed service appeal No.1227/2020 in the Honourable Tribunal against the notification dated 25.06.2019, whereby the petitioner has been placed in surplus pool. Accordingly the petitioner prayed that the impugned notification dated 25.06.2019 of the respondents may kindly be set aside being illegal unlawful against the surplus policy of 2001 as the petitioner does not fall under the surplus policy) and the petitioner may kindly be retained/adjusted against the Secretariat Cadre born at the strength of Establishment Department of civil Secretariat and the seniority/promotion may also be given to the petitioner since the inception of the employment in the Government Department with retrospective back benefits as per the judgment titled Tikka Khan & others VS Syed Muzafar Hussain Shah

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SECRETARY
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

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10th Oct. 2022

1. Counsel for the petitioner present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Abdul Majid Lodhi, Section Officer for the respondents present.

2. Representative of the respondents has submitted copy of notification No. SOE-IV(E&AD)/1-2/2022 dated 07.10.2022, whereby judgment, dated 26.07.2022 of this Tribunal has been implemented. Learned counsel for the petitioner is satisfied with the same. The petition is, therefore, filed. Consign.

3. Pronounced in open court at Peshawar under my hands and the seal of the Tribunal on this 10th day of October, 2022.

(Kalim Arshad Khan)
Chairman

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 06-10-22
 Number of Copies 2-D
 Copying Fee 16/-
 Urgent 5/10
 Total 15/10
 Name of _____
 Date of Copying 06-10-22
 Date of Delivery of Copy 06-10-22



39

NOTIFICATION :-

No.FS/E/100-19 (GS) Vol-2/ 8522-43 In pursuance of Peshawar High Court Peshawar Judgement dated 07-11-2013 in Writ Petition No.969/2010 and COC No 178-P/2014 dated 31-05-2014, the competent authority has been pleased to regularize the services of the following contract officials with effect from 01-07-2008:-

| S.No. | Name & Designation | BPS | Date of initial appointment | Present place of posting |
|-------|------------------------------|-----|-----------------------------|--|
| 1 | Mr Hanif-ur-Rehman Assistant | 14 | 01-12-2004 | Law & Order Department FATA Secretariat |
| 2 | Mr Astiq Hussain Assistant | 14 | 01-12-2004 | Admn Infra & Coord Department FATA Secretariat |
| 3 | Mr Zahid Khan Assistant | 14 | 01-12-2004 | Admn. Infra & Coord Department FATA Secretariat |
| 4 | Mr Qaiser Khan Assistant | 14 | 01-12-2004 | Directorate of Minerals Industries & Technical Education (FATA) Peshawar |
| 5 | Muhammad Zahir Shah Tracer | 5 | 14-10-2004 | Directorate of Minerals Industries & Technical Education (FATA) Peshawar |

ADDITIONAL CHIEF SECRETARY (FATA)

Dated: 13/6/2014

Copy to :-

- 1 Secretary States & Frontier Regions Division Government of Pakistan Islamabad
- 2 Secretary Establishment Division Government of Pakistan Islamabad
- 3 Secretary Finance Division Government of Pakistan Islamabad
- 4 Secretary Law Division Government of Pakistan Islamabad
- 5 Secretary Establishment Department Khyber Pakhtunkhwa
- 6 Secretary Finance Department Khyber Pakhtunkhwa
- 7 Secretary Law & Order Department FATA Secretariat
- 8 Registrar Peshawar High Court Peshawar with reference to letter No 9708/Jud dated 31-05-2014
- 9 Director (C&WS) FEB & GIBF Building Shahrah-e-Suhrawardy Zero Point Islamabad
- 10 Director Minerals, Industries & Technical Education (FATA)
- 11 Accountant General Khyber Pakhtunkhwa
- 12 Additional Accountant General (PR) Sub Office Peshawar
- 13 Deputy Secretary (Litigation) FATA Secretariat
- 14 Section Officer (Budget & Accounts) Admn. FATA Secretariat
- 15 Estate Officer/DDO FATA Secretariat
- 16 PS to Chief Secretary Khyber Pakhtunkhwa
- 17 PS to Secretary A.I&C Department FATA Secretariat
- 18 PS to Additional Chief Secretary FATA Secretariat
- 19 Bill Clerk A I&C Department FATA Secretariat
- 20 Officials concerned
- 21 Personal files
- 22 File No 100/90 (Task Force)

Taimur Haider Khan
Advocate Supreme Court
Attested

Section Officer (Estab)

17(3)



DIRECTORATE OF ESTABLISHMENT
KHYBER PAKHTUNKHWA

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(Establishment Wing)

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Dated Peshawar, the October 7th, 2022

NOTIFICATION

No. SO E-IV (E&AD)/1-2/2022: - In pursuance of Khyber Pakhtunkhwa Service Tribunal judgement in Service Appeal No. 1227/2020 dated 14.01.2022 and subsequent Execution Petition No. 242-252/2022 dated 26.07.2022 in Service Appeal No. 1227/2020 dated 14.01.2022, in compliance of the orders passed by Khyber Pakhtunkhwa Service Tribunal Mr. Hanif Ur Rehman, Assistant (BS-16), presently working as Assistant in Directorate of Prosecution, Home Department Khyber Pakhtunkhwa is hereby conditionally adjusted as Assistant (BS-16) in Civil Secretariat, Peshawar till final judgement of Supreme Court of Pakistan in CPLA No. 358-P/2022 dated 25.04.2022 which is pending adjudication before Supreme Court of Pakistan.

2. His seniority and other claims will be settled in due course of time.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Endst: Even No. & Date:

Copy of the above is forwarded to: -

1. Accountant General, Khyber Pakhtunkhwa.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Home Department.
3. Director General, Directorate of Prosecution, Home Department.
4. Section Officer (Admn), Administration Department.
5. Section Officer (Secret), Establishment Department.
6. Section Officer (Lit-III), Establishment Department for further necessary action.
7. P.S to Secretary Establishment Department.
8. P.S to Special Secretary (Estt), Establishment Department
9. P.A to Addl: Secretary (Estt), Establishment Department.
10. P.A to Deputy Secretary (Estt), Establishment Department.
11. Official concerned.

SECTION OFFICER (E-IV)

Tahmas Khan
Advocate Supreme Court
Attested



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(Establishment Wing)

C
Measure

(41)

No. SOE.IV (E&AD) 1-13/2023
Dated Peshawar, the 08.02.2023

To

1. All Section Officer (Gen./Admn/Estt) of the concerned Administrative Departments, Civil Secretariat, Khyber Pakhtunkhwa.
2. The Section Officer (Admn), Governor Secretariat, Khyber Pakhtunkhwa.
3. The Section Officer (Admn), Chief Minister Secretariat.
4. The Section Officer (Admn), Staff Training Institute, Khyber Pakhtunkhwa.
5. The Section Officer to MSG, Governor's House, Peshawar.

Subject:- TENTATIVE SENIORITY LISTS OF PRIVATE SECRETARIES CADRE/ SUPERINTENDENT CADRES OF THE CIVIL SECRETARIAT, KHYBER PAKHTUNKHWA.

I am directed to refer to the above cited subject and to enclose copies of tentative seniority lists of the following cadres of Khyber Pakhtunkhwa Civil Secretariat with the request to kindly circulate/bring the same into the notice of all officers / officials working in your respective departments. The same is also available on official website: <http://estab-admin.gkp.pk>. Reservations, if any, may be conveyed to this department on or before 07.03.2023 for consideration / settlement before final declaration thereof. Besides, the departments concerned would be required to issue a certificate to the effect that the said lists have been formally brought into the notice of all concerned so as to secure Govt.'s legal position viz-a-viz the claims/lame excuses of ignorance about such lists often resorted to by certain officials when it comes to litigations in the Courts:-

| | |
|-------|--------------------------------------|
| i. | Additional Private Secretary (BS-19) |
| ii. | Senior Private Secretary (BS-18) |
| iii. | Private Secretary (BS-17) |
| iv. | Sr. Scale Stenographer (BS-16) |
| v. | Stenographer (BS-14) |
| vi. | Superintendent (BS-17) |
| vii. | Assistant (BS-16) |
| viii. | Senior Clerk (BS-14) |
| ix. | Junior Clerk (BS-11) |

2. In case no objection is received by the target date, it would be presumed that no individual of your department has any objection to the tentative seniority list.

(SIRAJ MUHAMMAD)
SECTION OFFICER (E-IV)
9210461

Endst: No. & Date Even.

A copy of the above is forwarded to the:-

1. P.S. to Secretary Establishment Department.
2. P.S. to Special Secretary (Estt.), Establishment Department.
3. P.A to Deputy Secretary (Estt), Establishment Department.
4. Section Officer (Admn), Administration Department with the request to bring it into the notice of the all concerned employees of E&A Deptt.

SECTION OFFICER (E-IV)

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CERTIFICATE

Subject:- TENTATIVE SENIORITY LISTS OF PRIVATE SECRETARIES CADRES/
SUPERINTENDENT CADRES OF THE CIVIL SECRETARIAT, KHYBER
PAKHTUNKHWA.

It is certified that I have gone through my particulars mentioned at Serial No. _____ of the tentative seniority list of _____ (BPS-) and found them correct, except at the following columns:-

| S.# | Column No. | Present entry | To be replaced by (Attach copy, if any) | Remarks |
|-----|------------|---------------|--|---------|
| | | | | |

The following discrepancies are also brought into the notice:-

- 1.
- 2.
- 3.

Note:- Additional sheet may be used, if required, please.

Name: _____
Designation: _____
Department: _____
Date _____

Taimur Haider Khan
Advocate Supreme Court
Attested

(43)

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|------------------------|---------------|--------------------|------------------------------------|--|---|------------------------------------|-----------|
| 1 | Mudassar Khan S/O Mushtaq Ahmad | M.B.A | 09.09.1987 | Nowshera | 30.06.2015 | 30.06.2015 | Law Deptt. | By initial rectt. | Assistant |
| 2 | Mr. Muhammad Iqbal S/O Muhammad Ashiq | F.A | 14.08.1968 | Peshawar | 17.12.1992 | 02.11.2015 | Agriculture Deptt. | By promotion | Assistant |
| 3 | Mr. Aurangzeb S/O Khan Sahib | Matric | 21.04.1974 | Peshawar | 01.05.1992 | 12.02.2018 | Law Deptt. | By promotion | Assistant |
| 4 | Mr. Shuja-ud-Din | Matric | 10.02.1970 | Peshawar | 01.07.1990 | 28.01.2016 | Finance Deptt. | By promotion | Assistant |
| 5 | Mr. Hamayun Mustafa | M.Com | 15.12.1981 | Chitral | 15.01.2008 | 27.05.2016 | E&AD (O/O Minister for PHE) | By promotion | Assistant |
| 6 | Mian Muhammad Tariq | B.A | 19.12.1984 | Swat | 22.01.2008 | 27.05.2016 | Social Welfare Deptt. | By promotion | Assistant |
| 7 | Mr. Yousaf Khan | M.A | 07.03.1979 | Bannu | 15.01.2008 | 27.05.2016 | Higher Education Deptt. | By promotion | Assistant |
| 8 | Mr. Muhammad Ashraf Khan S/O Muhammad Zar Khan | M.A | 01.02.1979 | Dir Upper | 15.01.2008 | 27.05.2016 | E&AD (Admn Branch) | By promotion | Assistant |
| 9 | Miss. Noor Begum | M.A | 01.01.1981 | Mardan Female | 15.01.2008 | 27.05.2016 | Minerals Dev. Deptt. | By promotion | Assistant |
| 10 | Mr. Haider Ali | B.A | 06.12.1985 | Khyber .. | 15.01.2008 | 27.05.2016 | E&AD (O/O Special Assistant to for C&W) | By promotion | Assistant |
| 11 | Mr. Muhammad Sahir | B.A | 08.04.1981 | Peshawar | 15.01.2008 | 27.05.2016 | Ministry of Federal for Education & Professional Training for 03 years w.e.f 26.04.2022 | By promotion | Assistant |
| 12 | Mr. Asmat Ullah Khan S/O Taza Gul | B.A | 31.08.1982 | Lakki Marwat | 15.01.2008 | 27.05.2016 | Transport Deptt. | By promotion | Assistant |
| 13 | Mr. Imtiaz Khan S/O Abdul Wahid | B.Sc | 08.08.1983 | Mohmand .. | 15.01.2008 | 22.12.2016 | Energy & Power Deptt. | By promotion | Assistant |
| 14 | Mr. Muhammad Javed Akhtar | M.A | 01.08.1979 | D.I.Khan | 19.11.2001 | 22.12.2016 | E&A Deptt. (O/o CS) | By promotion | Assistant |
| 15 | Muhammad Jehangir Rehman | B.A | 04.09.1986 | Khyber .. | 15.01.2008 | 22.12.2016 | Environment Deptt. | By promotion | Assistant |
| 16 | Mr. Amjad Ali S/O Nawab Shah | B.A/LLB | 25.03.1983 | FR Peshawar | 16.01.2008 | 22.12.2016 | E&AD, (Lit-II) | By promotion | Assistant |
| 17 | Miss Shumaila D/O Muhammad Afzal | B.A | 04.04.1984 | Mansehra Female | 15.01.2008 | 31.05.2017 | Directorate of Aviation, Administration Deptt. | By promotion | Assistant |
| 18 | Mr. Fahim Ullah | B.Com | 20.03.1985 | FR Bannu | 15.01.2008 | 22.12.2016 | Information Deptt. | By promotion | Assistant |
| 19 | Mr. Raza Khan | M.A/ B.ed | 01.07.1985 | Mohmand . | 15.01.2008 | 22.12.2016 | Finance Deptt. | By promotion | Assistant |
| 20 | Mr. Naveed Alam | B.Sc | 15.03.1981 | Malakand .. | 15.01.2008 | 22.12.2016 | Minerals Dev. Deptt. | By promotion | Assistant |
| 21 | Mr. Mazhar-ul-Islam | B.Sc | 14.03.1982 | Mansehra | 17.01.2008 | 22.12.2016 | Health Deptt. | By promotion | Assistant |
| 22 | Mr. Muhammad Zaheer | B.A | 15.11.1984 | Abbottabad | 15.01.2008 | 22.12.2016 | Higher Education Deptt. | By promotion | Assistant |

Tahir Haider Khan
Advocate Supreme Court
Attested

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|------------------------|---------------|--------------------|------------------------------------|--|--|------------------------------------|-----------|
| 23 | Mr. Khan Zaman | B.A | 25.01.1977 | Lakki Marwat | 15.01.2008 | 22.12.2016 | Housing Deptt. | By promotion | Assistant |
| 24 | Mr. Gul Nawaz S/O Sharif Gul | B.Com | 22.03.1983 | Malakand | 15.01.2008 | 22.12.2016 | Housing Deptt. | By promotion | Assistant |
| 25 | Miss. Zunaira Rashid | F.A | 14.03.1985 | Mansehra Female | 24.01.2008 | 22.12.2016 | E&AD (E-IV Section) | By promotion | Assistant |
| 26 | Mr. Qasim Ali Awan S/O Shabbir Ahmad Awan | B.A | 21.02.1987 | Mansehra | 15.01.2008 | 22.12.2016 | Minerals Dev. Deptt. | By promotion | Assistant |
| 27 | Mr. Farmanullah S/O Tasleem Khan | M.A | 22.08.1987 | Lakki Marwat | 15.01.2008 | 22.12.2016 | Home Deptt. | By promotion | Assistant |
| 28 | Syed Mansoor Ahmad | B.A | 22.02.1986 | Malakand | 15.01.2008 | 22.12.2016 | Agriculture Deptt. | By promotion | Assistant |
| 29 | Mr. Aziz-ur-Rehman | B.A | 14.04.1974 | Dir Upper | 15.01.2008 | 22.12.2016 | Minerals Dev. Deptt. | By promotion | Assistant |
| 30 | Mr. Nisar Ahmad S/O Abdullah | B.A | 04.07.1978 | Chitral | 15.01.2008 | 22.12.2016 | Irrigation Deptt. | By promotion | Assistant |
| 31 | Said Shah Bacha | M.A | 11.04.1979 | Swat | 15.01.2008 | 22.12.2016 | E&AD (O/O Special Assistant to CM for Prison as PS (OPS)) | By promotion | Assistant |
| 32 | Mr. Muhammad Ashraf S/O Muhammad Sherin | B.A | 02.03.1981 | Swat | 15.01.2008 | 22.12.2016 | E&AD (E-V Section) | By promotion | Assistant |
| 33 | Mr. Akbar Zaman | B.A | 27.03.1984 | Haripur | 15.01.2008 | 22.12.2016 | Irrigation Deptt. | By promotion | Assistant |
| 34 | Saeed Ahmad Khan | F.Sc | 01.01.1987 | Chitral | 15.01.2008 | 22.12.2016 | Local Govt. Deptt. | By promotion | Assistant |
| 35 | Mr. Hanif Ullah | M.A / L.L.B | 20.02.1987 | Dir Lower | 15.01.2008 | 22.12.2016 | Finance Deptt. | By promotion | Assistant |
| 36 | Mr. Abdur Rashid Khan | MBA (Finance) | 18.02.1987 | Chitral | 15.01.2008 | 22.12.2016 | E&AD (E-II Section) | By promotion | Assistant |
| 37 | Mr. Ateeque-ur-Rehman S/O Muhammad Shafique | B.A | 27.01.1983 | Mansehra | 15.01.2008 | 22.12.2016 | Finance Deptt. | By promotion | Assistant |
| 38 | Syed Azam Shah | M.Com | 09.10.1986 | Mansehra | 15.01.2008 | 22.12.2016 | On deputation to Private School Regulatory Authority for 03 w.e.f 08.06.2022 to 07.06.2025) | By promotion | Assistant |
| 39 | Mr. Bilal Khan | B.A | 21.06.1985 | Abbottabad | 15.01.2008 | 22.12.2016 | Finance Deptt. | By promotion | Assistant |
| 40 | Mr. Muhammad Awais Ali S/O Safi Ullah | M.A | 03.02.1980 | Mansehra | 15.01.2008 | 22.12.2016 | On deputation to Private School Regulatory Authority for 03 w.e.f 06.08.2018 to 05.08.2021) extended for 2yrs w.e.f 06.08.2021 to 05.08.2023 | By promotion | Assistant |
| 41 | Mr. Muhammad Arif | F.Sc | 07.02.1984 | Mansehra | 15.01.2008 | 22.12.2016 | Home Deptt. | By promotion | Assistant |

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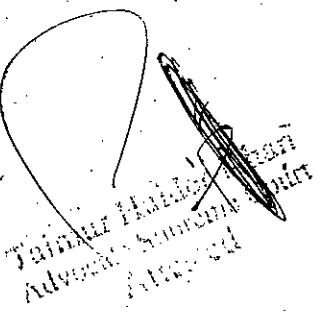
Advocate Supreme Court
Attested

(43)

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR.(AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt:/ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|--------------------------------------|------------------------|---------------|--|------------------------------------|--|---|------------------------------------|-----------|
| 42 | Mr.Arsalan Ahmad | B.Com | 07.02.1988 | Mansehra | 15.01.2008 | 22.12.2016 | On deputation basis in E&SE Deptt: for further posting in project. | By promotion | Assistant |
| 43 | Mr. Farid Khan | Matric | 20.03.1986 | Charsadda | 28.04.2008 | 22.12.2016 | Finance Deptt. | By promotion | Assistant |
| 44 | Mr. Vijay Hameed | Matric | 16.02.1987 | Peshawar Minority | 26.04.2008 | 22.12.2016 | P&D Deptt. | By promotion | Assistant |
| 45 | Mr. Abdul Basit S/O Muhammad Riaz | BA | 20.05.1989 | Kohat | 13.08.2008 | 22.12.2016 | E&AD O/O. Spl Astt. To CM for Population Welfare | By promotion | Assistant |
| 46 | Mr. Sohail Zafar Amin | F.A | 03.02.1988 | Karak | 22.11.2008 | 22.12.2016 | on deputation to KP-Culture, Tourism Authority for initial period of 03 years w.e.f. 04.11.2022 to 03.11.2025 | By promotion | Assistant |
| 47 | Mr. Naeem Shah S/O Rahmat Shah | M.A | 17.11.1990 | Peshawar | 22.11.2008 | 22.12.2016 | Sports Dept. | By promotion | Assistant |
| 48 | Mr. Sher Aziz Khan | Matric | 04.02.1973 | Chitral | 11.08.1991 | 22.12.2016 | ST&IT Deptt. | By promotion | Assistant |
| 49 | Mr. Abdul Haleem | FA | 04.09.1974 | D.I.Khan | 08.02.1992 | 22.12.2016 | Industries Deptt. | By promotion | Assistant |
| 50 | Mr. Ali Gohar | FA | 02.07.1972 | Peshawar | 09.08.1992 | 22.12.2016 | Law Deptt. | By promotion | Assistant |
| 51 | Syed Naseeruddin | Matric | 30.12.1974 | Peshawar | 07.02.1993 | 22.12.2016 | E&SE Deptt. | By promotion | Assistant |
| 52 | Mr. Fazle Akbar | FA | 03.02.1969 | Mardan | 24.04.1993 | 22.12.2016 | Finance Deptt. | By promotion | Assistant |
| 53 | Mr. Umar Gul | Matric | 05.11.1973 | Peshawar | 26.05.1993 | 22.12.2016 | LGE&RD Deptt. | By promotion | Assistant |
| 54 | Mr. Aziz Ud Din S/O Khoshwat Khan | MSc | 10.07.1992 | Chitral (Minority Quota) (Kelash) | 17.03.2017 | 17.03.2017 | E&AD (O/O Special Assistant to CM for Minority Affairs as PS (OPS) | By initial rectt. | Assistant |
| 55 | Mr. Atif Pervez S/O Pervez Bhatti | M.Com | 30.03.1987 | Peshawar (Minority Quota) (Christian) | 20.03.2017 | 20.03.2017 | CM Sectt. | By initial rectt. | Assistant |
| 56 | Mr. Kashif Munir S/O Munir | M.Com | 26.08.1990 | Peshawar (Minority Quota) (Christian) | 20.03.2017 | 20.03.2017 | E&AD (R-V Section) | By initial rectt. | Assistant |
| 57 | Mr. Abdul Rab S/O Abdul Rahim Bacha | M.A | 11.06.1975 | Bajour (Disable Quota) | 20.03.2017 | 20.03.2017 | P&D Deptt. | By initial rectt. | Assistant |
| 58 | Mr. Tasleem Gul | Matric | 02.05.1975 | Charsadda | 28.06.1993 | 31.05.2017 | CM Sectt | By promotion | Assistant |
| 59 | Mr. Abdul Majeed S/O Gul Ahmed | FA | 01.10.1968 | Bannu | 29.07.1993 | 31.05.2017 | Finance Deptt | By promotion | Assistant |

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 Tahir Haddad

 Deputy Secretary

 Peshawar

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|----------------------------------|---------------|------------------------------|------------------------------------|--|---|------------------------------------|-----------|
| 60 | Mr. Niaz Ali | FA | 01.03.1976 | Peshawar | 02.03.1994 | 31.05.2017 | Law Deptt. | By promotion | Assistant |
| 61 | Mr. Zar Bad shah | Matric | 01.02.1972 | Peshawar | 11.07.1994 | 31.05.2017 | Higher Education Deptt. | By promotion | Assistant |
| 62 | Mr. Raham Daraz | Matric | 25.01.1970 | Bannu | 02.08.1994 | 31.05.2017 | Environment Deptt. | By promotion | Assistant |
| 63 | Mr. Shahi Mand | FA | 01.11.1971 | Charsadda | 09.08.1994 | 31.05.2017 | Finance Deptt. | By promotion | Assistant |
| 64 | Mr. Imran Saheed | M.A | 30.03.1974 | Peshawar | 28.09.1994 | 31.05.2017 | Finance Deptt. | By promotion | Assistant |
| 65 | Mr. Mehboob Shah S/O Mir Badshah | BA | 07.10.1967 | Peshawar | 30.10.1994 | 31.05.2017 | E&AD (O/o CS) | By promotion | Assistant |
| 66 | Miss. Zakia Sumbal Khan D/O Ghulam Muhammad Khan | M.A | 01.08.1992 | Lakki Marwat Female Quota | 23.06.2017 | 23.06.2017 | Home Deptt. | By initial rectt. | Assistant |
| 67 | Mr. Muhammad Ali | Matric | 03.12.1972 | Peshawar | 13.11.1994 | 12.02.2018 | Finance Deptt. | By promotion | Assistant |
| 68 | Mr. Abdul Shakoor | F.A. | 23.03.1973 | Abbottabad | 01.12.1994 | 30.10.2017 | Governor House | By promotion | Assistant |
| 69 | Mr. Farhad Khan S/O Shamsad Khan | Matric | 10.07.1976 | Peshawar | 05.12.1994 | 30.10.2017 | Sports Deptt. | By promotion | Assistant |
| 70 | Mr. Rambail Gul | Matric | 05.02.1972 | Peshawar | 14.07.1990 | 30.10.2017 | Home Deptt. | By promotion | Assistant |
| 71 | Mr. Muhammad Latif | Matric | 30.05.1974 | Peshawar | 01.02.1995 | 30.10.2017 | Finance Deptt. | By promotion | Assistant |
| 72 | Mr. Ghulam Akbar | FA | 13.08.1964 | Charsadda | 06.03.1995 | 30.10.2017 | Irrigation Deptt. | By promotion | Assistant |
| 73 | Mr. Fahad Khan | F.A. | 12.04.1976 | Peshawar | 12.03.1995 | 30.10.2017 | Livestock, Fisheries & Cooperative Deptt. | By promotion | Assistant |
| 74 | Mr. Said Naeem | Matric | 02.09.1973 | Swabi | 19.03.1995 | 30.10.2017 | Finance Deptt. | By promotion | Assistant |
| 75 | Mr. Malang S/O Abdul Haq | F.A. | 25.02.1971 | Peshawar | 20.03.1995 | 30.10.2017 | E&AD (Estate Office) | By promotion | Assistant |
| 76 | Mr. Usman Javed S/O Javed Iqbal | M.A | 07.07.1987 | Nowshera | 18.09.2014 | 08.02.2018 | E&AD (Policy Section) | By initial rectt. | Assistant |
| 77 | Mr. Mubashir Khan S/O Farman Ullah | B.E (Comp Eng) | 08.02.1989 | Nowshera | 25.01.2018 | 25.01.2018 | On deputation to PSRA w.e.f 6.10.2021 to 5.10.2024 | By initial rectt. | Assistant |
| 78 | Syed Ali Ijlal Hussain Shah S/O Syed Lal Hussain Shah | MSc | 09.01.1987 | Mansehra | 07.02.2018 | 07.02.2018 | Galiat Development Authority on deputation basis w.e.f 06.04.2021 to 05.04.2024 | By initial rectt. | Assistant |
| 79 | Mr. Wajahat Raza Qureshi S/O Muhammad Tasaddiq | MSc (Electrical Eng) | 06.09.1988 | Mansehra | 01.10.2015 | 01.02.2018 | Health Deptt. | By initial rectt. | Assistant |
| 80 | Mr. Arab Gul S/O Sher Badshah | M.Phil (Pharmaceutical Sciences) | 06.04.1989 | Mardan | 24.01.2018 | 24.01.2018 | E-III Section, E&AD | By initial rectt. | Assistant |
| 81 | Mr. Muhammad Waqas S/O Muhammad Ayaz | MBA (Fin) | 19.03.1986 | Mardan | 25.01.2018 | 25.01.2018 | Finance Deptt. | By initial rectt. | Assistant |

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Taimur Haidar Khan
Advocate Supreme Court
Attended

(47)

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|--|------------------------|---------------|----------------------|------------------------------------|--|--|------------------------------------|-----------|
| 82 | Mr. Muhammad Hamid Ullah S/O Sana Ullah Khan | M.A | 24.10.1991 | Bannu | 25.01.2018 | 25.01.2018 | E&AD (O/O CS, Dairy Section) | By initial rectt. | Assistant |
| 83 | Mr. Sabz Ali Khan S/O Shahzada Khan | M.A | 24.03.1988 | Swat | 01.02.2018 | 01.02.2018 | Governor Sectt. | By initial rectt. | Assistant |
| 84 | Mr. Muhammad Ilyas S/O Amir Nawaz | M.A (English) | 07.03.1992 | Lakki Marwat | 25.01.2018 | 25.01.2018 | Finance Deptt. | By initial rectt. | Assistant |
| 85 | Mr. Izaz Iqbal S/O Mohammadia Gul | M.A | 01.07.1989 | Dir Upper | 26.01.2018 | 26.01.2018 | PHE Deptt. | By initial rectt. | Assistant |
| 86 | Mr. Fayyaz Khan | Matric | 06.09.1972 | Nowshera | 20.03.1995 | 12.02.2018 | Population Welfare Deptt. | By promotion | Assistant |
| 87 | Mr. Noor Wali | Matric | 01.03.1974 | Peshawar | 20.03.1995 | 12.02.2018 | Energy & Power Deptt. | By promotion | Assistant |
| 88 | Mr. Shahid Aziz | Matric | 24.04.1970 | Peshawar | 22.03.1995 | 12.02.2018 | Finance Deptt. | By promotion | Assistant |
| 89 | Mr. Muhammad Asif | Matric | 11.04.1975 | Peshawar | 26.03.1995 | 12.02.2018 | Auqaf Deptt. | By promotion | Assistant |
| 90 | Mr. Imtiaz Ali Khan S/O Mahboob Ali Khan | Matric | 05.08.1970 | Nowshera | 01.04.1995 | 22.01.2019 | Energy & Power Deptt. | By promotion | Assistant |
| 91 | Mr. Ajmal Khan | Matric | 05.04.1973 | Peshawar | 29.06.1995 | 12.02.2018 | STI - E&AD | By promotion | Assistant |
| 92 | Mr. Sawan Das | Matric | 07.03.1975 | Peshawar Minority | 01.07.1995 | 12.02.2018 | Finance Deptt. | By promotion | Assistant |
| 93 | Mr. Mukaram Khan S/O Fazal Wahab | Matric | 11.05.1972 | Peshawar | 10.07.1995 | 12.02.2018 | Law Deptt. | By promotion | Assistant |
| 94 | Syed Jehangir Shah | Matric | 15.05.1977 | Mansehra | 13.08.1995 | 12.02.2018 | Finance Deptt. | By promotion | Assistant |
| 95 | Mr. Farmanullah S/O Niaz Majan | FA | 20.12.1967 | Karak | 12.09.1995 | 12.02.2018 | CM Sectt. | By promotion | Assistant |
| 96 | Mr. Muhammad Irfan Anjum | BA | 23.07.1976 | Peshawar | 13.09.1995 | 22.01.2019 | PHE Deptt. | By promotion | Assistant |
| 97 | Mr. Muhammad Saeed | Matric | 06.03.1974 | Swabi | 12.12.1995 | 12.02.2018 | Sports Deptt. | By promotion | Assistant |
| 98 | Mr. Muhammad Imran Anjum | Matric | 01.06.1977 | Peshawar | 18.12.1995 | 25.05.2018 | E&AD, Special Assistant to CM for Information) | By promotion | Assistant |
| 99 | Mr. Shaukat Ali | Matric | 08.04.1975 | Peshawar | 01.02.1996 | 22.01.2019 | Social Welfare Deptt. | By promotion | Assistant |
| 100 | Miss Shumaila D/O Mir Daraz Khan | B.A | 11.11.1971 | Peshawar Female | 05.01.2009 | 12.02.2018 | E&AD, R-I Section | By promotion | Assistant |
| 101 | Mr. Zar Muhammad S/O Wazir Khan | M.A (Eng) | 22.04.1992 | Mohmand | 10.04.2018 | 10.04.2018 | E&AD (E-II Section) | By initial rectt. | Assistant |
| 102 | Mr. Zafeer Gul | Matric | 18.03.1972 | Peshawar | 18.09.1995 | 25.05.2018 | E&AD (CBA Section) | By promotion | Assistant |
| 103 | Mr. Amjad Ali S/O Feroz Khan | Matric | 04.10.1977 | Peshawar | 06.02.1996 | 25.05.2018 | Higher Education Deptt. | By promotion | Assistant |
| 104 | Mr. Fayyaz Ali | Matric | 13.08.1976 | Mardan | 03.03.1996 | 25.05.2018 | Environment Deptt. | By promotion | Assistant |

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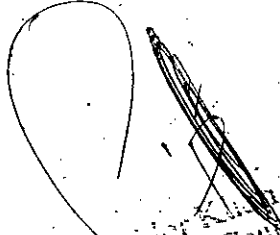
Taimur Haider
Advocate Supreme Court
Attested

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|-----------------------------|---------------|------------------------|------------------------------------|--|---|------------------------------------|-----------|
| 105 | Mr. Victor John | FA | 01.12.1973 | Peshawar Minority | 10.03.1996 | 25.05.2018 | E&A Deptt.(Cash Branch) | By promotion | Assistant |
| 106 | Mr. Hazrat Khan | Matric | 05.06.1970 | Peshawar | 18.03.1996 | 25.05.2018 | Finance Deptt. | By promotion | Assistant |
| 107 | Mr. Amir Bahadar Khan | Matric | 24.02.1968 | Dir | 01.04.1996 | 25.05.2018 | C&W Deptt. | By promotion | Assistant |
| 108 | Syed Wisal Ali Shah | FA | 04.10.1971 | Peshawar | 01.01.1996 | 25.05.2018 | Health Deptt. | By promotion | Assistant |
| 109 | Mr. Naheed Gul S/O Sardar Gul | Matric | 01.04.1976 | Charsadda | 01.04.1996 | 25.05.2018 | E&AD (Lit-II Section) | By promotion | Assistant |
| 110 | Mr. Ziaullah S/O Abdul Aziz | Matric | 15.04.1978 | Mardan | 10.05.1996 | 25.05.2018 | Minerals Dev. Deptt. | By promotion | Assistant |
| 111 | Mr. Inayat-ur-Rehman S/O Mir Rehman | Matric | 04.06.1975 | Peshawar | 12.05.1996 | 25.05.2018 | Finance Deptt. | By promotion | Assistant |
| 112 | Mr. Qaiser Khan | FA | 10.04.1978 | Peshawar | 13.05.1996 | 25.05.2018 | Home Deptt. | By promotion | Assistant |
| 113 | Mr. Mumtaz Ali Shah | Matric | 01.05.1972 | Nowshera | 21.05.1996 | 25.05.2018 | E&AD(O/O Advisor to CM for Excise & Taxation) | By promotion | Assistant |
| 114 | Mr. Sajjad Ali | Matric | 11.12.1976 | Mardan | 29.05.1996 | 25.05.2018 | E&AD O/o Minister for Irrigation | By promotion | Assistant |
| 115 | Mr. Parvez Khan | M.A. | 02.03.1974 | Peshawar | 05.06.1996 | 25.05.2018 | STI - E&AD | By promotion | Assistant |
| 116 | Mr. Hameed Khan | MA | 12.05.1970 | Peshawar | 17.06.1996 | 25.05.2018 | CM Sectt. | By promotion | Assistant |
| 117 | Mr. Abdul Akbar | Matric | 17.01.1977 | Mardan | 25.10.1995 | 25.05.2018 | Finance Deptt. | By promotion | Assistant |
| 118 | Mr. Liaqat Ali Khan | Matric | 22.02.1976 | Peshawar | 01.07.1996 | 25.05.2018 | E&AD (O/O Secretary Admn) | By promotion | Assistant |
| 119 | Mr. Arif Hussain Shah | Matric | 12.10.1979 | Haripur | 02.07.1996 | 25.05.2018 | CM Sectt. | By promotion | Assistant |
| 120 | Mr. Zafar Ullah | Matric | 30.03.1978 | Mardan | 10.07.1996 | 25.05.2018 | Home Deptt. | By promotion | Assistant |
| 121 | Fayyaz Hussain S/O Mumtaz Khan | B.A | 11.03.1979 | Peshawar | 09.07.1996 | 22.01.2019 | Finance Deptt. | By promotion | Assistant |
| 122 | Mr. Raza Muhammad S/O Din Muhammad | M.A. | 01.01.1994 | Mohmand | 17.08.2018 | 17.08.2018 | E&AD (Cabinet Section) | By initial rectt. | Assistant |
| 123 | Mr. Asad Mehmood S/O Hassan Mehmood | BS (CS) | 05.10.1995 | Hangu | 17.08.2018 | 17.08.2018 | Excise & Taxation Deptt. | By initial rectt. | Assistant |
| 124 | Mr. Ayat Ullah S/O Faiz ur Rehman | M. PHIL. (American Studies) | 03.08.1988 | Bajaur | 17.08.2018 | 17.08.2018 | E&AD (E-IV Section) | By initial rectt. | Assistant |
| 125 | Mr. Hammad Saleem Khan S/O Muhammad Saleem Khan | BS (Geology) | 06.01.1991 | Abbottabad | 06.09.2018 | 06.09.2018 | Irrigation Deptt. | By initial rectt. | Assistant |
| 126 | Mr. Mahmood Ullah S/O Noor Zali Khan | B.Sc (Civil Engineering) | 03.04.1992 | F.R Bannu | 20.08.2018 | 20.08.2018 | CM Sectt. | By initial rectt. | Assistant |
| 127 | Naseeb Khan S/O Lal Jan | M.A | 19.05.1986 | Khyber (Disable Quota) | 27.08.2018 | 27.08.2018 | P&D Deptt. | By initial rectt. | Assistant |

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 Faizur Raza Khan
 Advocate Supreme Court
 Attested

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|-------------------------------------|------------------------|---------------|--------------|------------------------------------|--|--|------------------------------------|-----------|
| 128 | Syed Asif Nawaz S/O Syed Amir Nawaz | BS (H) (Physics) | 30.08.1991 | Gadoon-Swabi | 10.05.2018 | 10.05.2018 | CM Sectt. | By initial rectt. | Assistant |
| 129 | Mr. Riaz-ul-Haq S/O Fazal-e-Akbar | Matric | 09.01.1977 | Mardan | 11.07.1996 | 22.01.2019 | Food Deptt. | By promotion | Assistant |
| 130 | Mr. Ijaz Khan | Matric | 09.05.1972 | Peshawar | 05.08.1996 | 22.01.2019 | LGE&RD Deptt. | By promotion | Assistant |
| 131 | S. Sakhawat Ali Shah | Matric | 13.04.1975 | Mansehra | 05.08.1996 | 22.01.2019 | Home Deptt. | By promotion | Assistant |
| 132 | Mr. Farman Ali | FA | 10.12.1974 | Peshawar | 11.08.1996 | 22.01.2019 | Finance Deptt. | By promotion | Assistant |
| 133 | Syed Sarwar Shah | Matric | 01.01.1972 | Peshawar | 01.08.1996 | 22.01.2019 | Finance Deptt. | By promotion | Assistant |
| 134 | Syed Yousaf Ali Shah | Matric | 15.02.1965 | Peshawar | 03.09.1996 | 22.01.2019 | E&SE Deptt. | By promotion | Assistant |
| 135 | Mr. Zarshaid | Matric | 02.03.1980 | Peshawar | 09.10.1996 | 22.01.2019 | Higher Education Deptt. | By promotion | Assistant |
| 136 | Mr. Haider Khan | FA | 12.09.1975 | Peshawar | 29.10.1996 | 22.01.2019 | PHE Deptt. | By promotion | Assistant |
| 137 | Mr. Muhammad Riaz | FA | 20.04.1976 | Mohmand | 01.01.1997 | 22.01.2019 | Finance Deptt. | By promotion | Assistant |
| 138 | Mr. Muhammad Wajid | Matric | 01.04.1978 | Abbottabad | 26.05.1997 | 22.01.2019 | Agriculture Deptt. | By promotion | Assistant |
| 139 | Mr. Wasi Ahmad | Matric | 06.04.1973 | Peshawar | 01.07.1997 | 22.01.2019 | Energy & Power Deptt. | By promotion | Assistant |
| 140 | Mr. Faizanullah S/O Muhammad Zaheer | B.A | 04.01.1990 | F.R Kohat | 23.04.2009 | 22.01.2019 | LGE&RD Deptt. (Perform duty in O/O LGE&RD) | By promotion | Assistant |
| 141 | Mr. Hameed Ullah | B.A | 20.05.1980 | Peshawar | 06.07.2009 | 22.01.2019 | E&SE Deptt. | By promotion | Assistant |
| 142 | Mr. Muhammad Naveed Tariq | B.A | 23.03.1979 | D.I.Khan | 18.11.2009 | 22.01.2019 | P&D Deptt. | By promotion | Assistant |
| 143 | Muhammad Adeel | D.Com | 13.03.1987 | Charsadda | 04.02.2010 | 22.01.2019 | Environment Deptt. | By promotion | Assistant |
| 144 | Mr. Hasham Ali Khan | Matric | 01.01.1976 | Peshawar | 02.09.1997 | 22.01.2019 | Irrigation Deptt. | By promotion | Assistant |
| 145 | Mr. Hazrat Ullah | Matric | 05.03.1977 | Khyber | 15.09.1997 | 22.01.2019 | Governor House | By promotion | Assistant |
| 146 | Mr. Muhammad Fayaz | F.A | 25.02.1978 | Haripur | 19.11.1997 | 22.01.2019 | E&SE Deptt. | By promotion | Assistant |
| 147 | Mr. Gul Hassan | Matric | 19.01.1976 | Mohmand | 06.03.1998 | 31.05.2019 | LGE&RD Deptt. | By promotion | Assistant |
| 148 | Mr. Muhammad Tahseen | Matric | 24.02.1978 | Mansehra | 30.03.1996 | 22.01.2019 | E&AD (Transport Section) | By promotion | Assistant |
| 149 | Mr. Muhammad Adnan | F.A | 02.02.1987 | Peshawar | 03.08.2010 | 22.01.2019 | Finance Deptt. | By promotion | Assistant |
| 150 | Mr. Hazrat Bilal | B.A. | 02.02.1987 | Nowshera | 12.08.2010 | 22.01.2019 | Administration Deptt | By promotion | Assistant |
| 151 | Mr. Sulaiman Shah | B.A | 05.03.1991 | Charsadda | 27.11.2010 | 22.01.2019 | P&D Deptt. | By promotion | Assistant |
| 152 | Mr. Muhammad Younas | Matric | 15.04.1979 | Karak | 11.09.2000 | 22.01.2019 | Higher Education Deptt. | By promotion | Assistant |
| 153 | Mr. Faisal Sarwar | Matric | 01.07.1980 | Peshawar | 11.09.2000 | 22.01.2019 | Environment Deptt. | By promotion | Assistant |
| 154 | Mr. Zahir Shah S/O ABDUL AZIZ | Matric | 07.01.1978 | Peshawar | 10.06.2000 | 22.01.2019 | Higher Education Deptt. | By promotion | Assistant |
| 155 | Mr. Aftab Ahmad | B.A. | 19.10.1978 | Peshawar | 10.06.2000 | 22.01.2019 | E&SE Deptt. | By promotion | Assistant |
| 156 | Mr. Muhammad Sabir | Matric | 01.01.1965 | Abbottabad | 01.10.2000 | 22.01.2019 | Governor House | By promotion | Assistant |
| 157 | Mr. Bakhtiar Khan S/O Sanobar Khan | F.A | 24.03.1979 | Peshawar | 19.10.2000 | 22.01.2019 | Governor Sectt. | By promotion | Assistant |

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt:/ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|--|------------------------|---------------|----------------------|------------------------------------|--|--|------------------------------------|-----------|
| 158 | Mr. Inayat ur Rehman S/O Saif ur Rehman | Matric | 20.03.1963 | Charsadda | 15.10.2001 | 22.01.2019 | Higher Education Deptt. | By promotion | Assistant |
| 159 | Mr. Zartaj Wali | Matric | 28.11.1975 | Peshawar | 28.01.2002 | 22.01.2019 | CM Sectt. | By promotion | Assistant |
| 160 | Mr. Imran Ahmad | Matric | 10.06.1981 | Peshawar | 28.01.2002 | 31.05.2019 | E&SE Deptt. | By promotion | Assistant |
| 161 | Mr. Said Karam | Matric | 08.02.1973 | Peshawar | 19.03.2003 | 31.05.2019 | Industries Deptt. | By promotion | Assistant |
| 162 | Mr. Abdul Basit S/O Kiramat Shah | B.Com | 21.11.1983 | Peshawar | 10.03.2011 | 31.05.2019 | ST&IT Deptt. | By promotion | Assistant |
| 163 | Mr. Anwar-ul-Habib | F.Sc | 23.12.1989 | Charsadda | 10.03.2011 | 31.05.2019 | Sports Deptt. | By promotion | Assistant |
| 164 | Mr. Sherdil Khan | Matric | 17.01.1985 | Peshawar | 11.03.2011 | 31.05.2019 | Social Welfare Deptt. | By promotion | Assistant |
| 165 | Miss Beenish | M.A./B.Ed | 14.08.1986 | Peshawar/ Female | 15.04.2011 | 31.05.2019 | Finance Deptt. | By promotion | Assistant |
| 166 | Mr. Zabeehullah | Matric | 24.02.1977 | Peshawar | 15.07.2006 | 31.05.2019 | Law Deptt. | By promotion | Assistant |
| 167 | Mr. Zeeshan Farukh | F.A | 15.09.1981 | Peshawar | 15.07.2006 | 31.05.2019 | CM Sectt. | By promotion | Assistant |
| 168 | Mr. Imran S/O Afzal | Matric | 13.03.1980 | Peshawar | 08.08.2003 | 31.05.2019 | Finance Deptt. | By promotion | Assistant |
| 169 | Mr. Abbas Jan S/O Ashraf Ud Din | B.A | 03.07.1984 | Charsadda | 08.08.2003 | 31.05.2019 | E&SE Deptt. | By promotion | Assistant |
| 170 | Mr. Naresh Lal Bhatti | Matric | 21.11.1979 | Peshawar Minority | 08.12.2003 | 08.11.2019 | E&AD (O/O Special Assistant to CM for Minority Affairs | By promotion | Assistant |
| 171 | Mr. Altaf Hussain | Matric | 16.06.1980 | Peshawar | 17.12.2003 | 08.11.2019 | Energy & Power Deptt. | By promotion | Assistant |
| 172 | Mr. Muhammad Bilal | M.A. | 20.11.1987 | Peshawar | 12.10.2011 | 08.11.2019 | P&D Deptt. | By promotion | Assistant |
| 173 | Mr. Aamir Salim | Matric | 18.08.1993 | Karak | 12.10.2011 | 08.11.2019 | CM Sectt. | By promotion | Assistant |
| 174 | Miss Faheema | B.A | 15.01.1991 | Peshawar/ Female | 13.10.2011 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 175 | Ms. Wajeeha Younas | M.Sc | 06.08.1986 | Haripur/ Female | 22.11.2011 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 176 | Mr. Usman Ali | Metric | 15.02.1983 | Dir Upper | 07.04.2004 | 22.01.2021 | LGE&RD Deptt. | By promotion | Assistant |
| 177 | Mr. Noor Elahi | Matric | 01.10.1974 | Peshawar | 13.07.2004 | 22.01.2021 | Transport Deptt. | By promotion | Assistant |
| 178 | Mr. Zar Ali | Matric | 02.02.1979 | Peshawar | 13.07.2004 | 22.01.2021 | PHE Deptt. | By promotion | Assistant |
| 179 | Mr. Irfan Ullah-I S/O Akhtar Shah | Matric | 12.05.1982 | Peshawar | 13.07.2004 | 22.01.2021 | Law Deptt. | By promotion | Assistant |
| 180 | Mr. Aurangzeb S/O Fazal ur Rehman | Matric | 03.04.1984 | Peshawar | 05.04.2004 | 22.01.2021 | E&AD (O/O CS) | By promotion | Assistant |
| 181 | Mr. Maqsood Ahmad | M.A. | 12.03.1971 | Peshawar | 01.01.1991 | 22.01.2021 | E&SE Deptt. | By promotion | Assistant |
| 182 | Mr. Waqas Muhammad | M.Sc | 01.03.1983 | Peshawar | 24.01.2012 | 22.01.2021 | KP-PSRA on deputation basis | By promotion | Assistant |
| 183 | Mr. Ahmad Ali Shah | M.A. | 16.04.1980 | Charsadda | 12.12.2002 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 184 | Mr. Farrukh Sair | M.A. | 10.03.1980 | Nowshera | 07.01.2004 | 22.01.2021 | Relief Deptt | By promotion | Assistant |

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Taimur Hanif Khan
Advocate Supreme Court
Attested

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt:- Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|--|------------------------|---------------|--------------|------------------------------------|--|---|------------------------------------|-----------|
| 185 | Mr. Zaheer-ud-Din, | B.A. | 01.04.1978 | Peshawar | 24.01.2012 | 22.01.2021 | E&AD (O/O Secy Estt) | By promotion | Assistant |
| 186 | Mr. Muhammad Javed | B.A. | 09.09.1972 | Peshawar | 24.01.2012 | 22.01.2021 | E&SE Deptt. | By promotion | Assistant |
| 187 | Mr. Imran Khan S/O Nasir Khan | M.A. | 10.03.1983 | Charsadda | 13.02.2008 | 22.01.2021 | Irrigation Deptt. | By promotion | Assistant |
| 188 | Mr. Imran Ullah | B.Sc | 05.01.1986 | Peshawar | 24.01.2012 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 189 | Mr. Iftikhar Ali | B.Sc | 10.01.1981 | Mohmand .. | 24.01.2012 | 22.01.2021 | Higher Education Deptt. | By promotion | Assistant |
| 190 | Mr. Assad Ullah Khan | M.A. | 26.12.1983 | Peshawar | 24.01.2012 | 22.01.2021 | P&D Deptt. | By promotion | Assistant |
| 191 | Mr. Masood Khan | M.A | 01.02.1981 | Peshawar | 24.01.2012 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 192 | Mr. Ashiq Hussain | M.A | 05.10.1982 | Peshawar | 24.01.2012 | 22.01.2021 | E&AD, O/O Minister for Housing | By promotion | Assistant |
| 193 | Mr. Muhammad Asad Sohail | B.A. | 10.09.1971 | Peshawar | 14.03.1993 | 22.01.2021 | Labour Deptt. | By promotion | Assistant |
| 194 | Mr. Farhan Baber | BBA(Hons) | 01.04.1985 | Peshawar | 24.01.2012 | 22.01.2021 | IPC Deptt. | By promotion | Assistant |
| 195 | Mr. Munir Khan S/O Sardar Khan | B.A. | 01.05.1985 | Lakki Marwat | 24.01.2012 | 22.01.2021 | Excise Deptt. | By promotion | Assistant |
| 196 | Mr. Hazrat Hilal | B.A | 05.03.1987 | Peshawar | 24.01.2012 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 197 | Mr. Abid Khan Abid S/O Abdul Marjan | M.Com | 04.02.1981 | Bannu | 24.01.2012 | 22.01.2021 | CM Sectt. | By promotion | Assistant |
| 198 | Mr. Kashif Hussain | DAE | 26.01.1987 | Charsadda | 24.01.2012 | 22.01.2021 | PHE Deptt. | By promotion | Assistant |
| 199 | Mr. Qamar Zaman S/O Muhammad Zaman | B.A | 06.02.1974 | Peshawar | 15.07.1997 | 22.01.2021 | Estate Office, E&AD | By promotion | Assistant |
| 200 | Mr. Jamshed Alam | M.Sc | 08.11.1982 | Chitral | 24.01.2012 | 22.01.2021 | E&AD (B.F Section) | By promotion | Assistant |
| 201 | Mr. Asmat Ullah Khan S/O Hazrat Ali Khan | M.Sc | 10.03.1985 | Bannu | 24.01.2012 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 202 | Mr. Ahsan Ullah | BIT (4 yrs) | 01.01.1986 | Khyber | 24.01.2012 | 22.01.2021 | Livestock, Fisheries & Cooperative Deptt. | By promotion | Assistant |
| 203 | Mr. Muhammad Hassan | M.A | 12.08.1985 | Lakki Marwat | 24.01.2012 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 204 | Mr. Habit Rizwan | M.Com | 04.12.1986 | D.I.Khan | 24.01.2012 | 22.01.2021 | Finance Deptt. | By promotion | Assistant |
| 205 | Mr. Iftikhar Ahmad | M.Sc | 01.05.1987 | Bannu | 24.01.2012 | 22.01.2021 | Finance deptt. | By promotion | Assistant |
| 206 | Mr. Ihsan Ullah S/O Shah Zada Khan | B.Sc | 17.04.1988 | Mohmand | 24.01.2012 | 31.05.2021 | Finance Deptt. | By promotion | Assistant |
| 207 | Mr. Tahsin Ullah | B.A. | 03.11.1984 | Karak | 24.01.2012 | 31.05.2021 | Relief Deptt. | By promotion | Assistant |
| 208 | Mr. Abdul Wahab | B.Sc | 16.12.1987 | Kohat | 24.01.2012 | 31.05.2021 | Home Deptt. (perform duty in O/O Advisor to CM for Home & Tribal Affairs) | By promotion | Assistant |
| 209 | Mr. Muhammad Amjad S/O Aurangzeb Awan | B.A. | 04.03.1985 | Mansehra | 24.01.2012 | 31.05.2021 | E&AD (E-I Section) | By promotion | Assistant |
| 210 | Syed Ihsanullah Shah | B.A. | 14.08.1987 | Karak | 24.01.2012 | 31.05.2021 | Health Deptt. | By promotion | Assistant |

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Tahir Ihsan Awan
Advocate Supreme Court
Attested

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|------------------------|---------------|---------------------|------------------------------------|--|---|------------------------------------|-----------|
| 211 | Mr. Shahab Ud Din S/O Sher Zada | B.A | 07.05.1985 | Malakand | 24.01.2012 | 31.05.2021 | Minerals Dev. Deptt. | By promotion | Assistant |
| 212 | Miss Uzma | M.A | 15.08.1984 | Peshawar/ Female | 24.01.2012 | 31.05.2021 | P&D Deptt. | By promotion | Assistant |
| 213 | Mr. Zahir Ahmad | B.A | 28.04.1986 | Tank | 24.01.2012 | 31.05.2021 | Irrigation Deptt. | By promotion | Assistant |
| 214 | Mr. Muhammad Irshad S/O Mahmood Khan | M.A | 08.03.1983 | Malakand | 24.01.2012 | 31.05.2021 | E&AD Admn Branch | By promotion | Assistant |
| 215 | Mr. Muhammad Farooq S/O Muhammad Naseem | B.A | 03.10.1981 | Abbottabad | 24.01.2012 | 31.05.2021 | Livestock, Fisheries & Cooperative Deptt. | By promotion | Assistant |
| 216 | Mr. Amir-ul-Haq S/O Bakhdoor Khan | M.A | 02.04.1982 | Chitral | 24.01.2012 | 31.05.2021 | Finance Deptt. | By promotion | Assistant |
| 217 | Mr. Riaz Khan | F.Sc | 15.04.1980 | Khyber | 24.01.2012 | 31.05.2021 | Accounts Section, E&AD | By promotion | Assistant |
| 218 | Mr. Muhammad Yaqub | B.A | 15.09.1988 | D.I.Khan | 24.01.2012 | 31.05.2021 | Administration Deptt. (Budget Section) | By promotion | Assistant |
| 219 | Mr. Irfan Ullah-II S/O Zar Gul Fida | F.Sc | 16.01.1984 | Karak | 24.01.2012 | 31.05.2021 | Law Deptt. | By promotion | Assistant |
| 220 | Mr. Muhammad Zubair Khan | B.A | 17.02.1992 | FR Peshawar | 24.01.2012 | 20.09.2021 | E&AD (O/o Minister for Environment) | By promotion | Assistant |
| 221 | Mr. Saleem Ullah Khan | BSc | 23.10.1990 | D.I.Khan | 24.01.2012 | 20.09.2021 | Health Deptt. | By promotion | Assistant |
| 222 | Mr. Hukam Khan | M.A | 12.01.1992 | Buner | 24.01.2012 | 20.09.2021 | E&AD (O/O Special Assistant to CM for Auqaf) | By promotion | Assistant |
| 223 | Mr. Imran Nabi | B.Sc | 02.02.1983 | Malakand | 24.01.2012 | 20.09.2021 | Industries Deptt. | By promotion | Assistant |
| 224 | Mr. Anwar Zaib S/O Muhammad Ullah | B.A. | 18.11.1983 | Khyber | 19.06.2006 | 20.09.2021 | E&AD (Secret Section) | By promotion | Assistant |
| 225 | Mr. Shahid Khan | M.A. | 20.08.1979 | Khyber | 24.01.2012 | 20.09.2021 | E&AD, (O/O Special Assistant to CM for Prison) | By promotion | Assistant |
| 226 | Mr. Hawas Ali | B.A | 12.12.1984 | Orakzai | 24.01.2012 | 20.09.2021 | Health Deptt. | By promotion | Assistant |
| 227 | Mr. Shams-ul-Haq | B.A | 03.03.1981 | Batagram | 24.01.2012 | 20.09.2021 | Finance Deptt. | By promotion | Assistant |
| 228 | Mr. Shams-ud-Din | M.A. | 02.03.1983 | Khyber | 24.01.2012 | 20.09.2021 | Finance Deptt. | By promotion | Assistant |
| 229 | Mr. Noor-ul-Islam | M.Com | 07.10.1990 | FR Peshawar | 24.01.2012 | 20.09.2021 | E&AD (R-II Section) | By promotion | Assistant |
| 230 | Mr. Sardar Dawood | B.A. | 01.04.1983 | Upper Dir | 24.01.2012 | 20.09.2021 | E&AD (Lit-I Section) | By promotion | Assistant |
| 231 | Mr. Yousaf-ur-Rahman | B.A. | 05.01.1986 | Chitral | 24.01.2012 | 20.09.2021 | Finance Deptt. | By promotion | Assistant |
| 232 | Mr. Muhammad Matloob | M.A | 01.03.1985 | Mansehra | 24.01.2012 | 20.09.2021 | E&AD (R-IV Section) | By promotion | Assistant |
| 233 | Mr. Naveed Ullah S/O Saif Ullah | B.A | 13.04.1991 | Khyber | 24.01.2012 | 20.09.2021 | On deputation to Private School Regulatory Authority extended for further .02 .years w.e.f 22.05.2021 to 21.05.2023 | By promotion | Assistant |

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(53)

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|--|------------------------|---------------|---------------------|------------------------------------|--|---|------------------------------------|-----------|
| 234 | Mr. Fakhr-ud-Din S/O Saif Ullah | F.A. | 28.05.1990 | Khyber | 24.01.2012 | 20.09.2021 | Health Deptt. | By promotion | Assistant |
| 235 | Syed Zeeshan Shah | D.Com | 18.04.1989 | Abbottabad | 24.01.2012 | 20.09.2021 | On deputation to Private School Regulatory Authority for 03 w.e.f 26.03.2021 to 25.03.2024. | By promotion | Assistant |
| 236 | Mr. Nisar Ahmad S/O Abdul Azeem | F.A. | 05.03.1986 | Batagram | 24.01.2012 | 20.09.2021 | Administration Deptt. | By promotion | Assistant |
| 237 | Mr. Yunas Bacha | B.A | 09.02.1982 | Lower Dir | 24.01.2012 | 20.09.2021 | Irrigation Deptt. | By promotion | Assistant |
| 238 | Mr. Mudassir Shah S/O Fazal Shah | M.A | 19.03.1989 | Swabi | 24.01.2012 | 20.09.2021 | LGE&RD Deptt. | By promotion | Assistant |
| 239 | Mr. Mujeeb-ur-Rehman | Matric | 18.01.1988 | Abbottabad | 24.01.2012 | 20.09.2021 | Auqaf Deptt. | By promotion | Assistant |
| 240 | Mr. Haider Rasheed | Matric | 01.08.1989 | Haripur | 24.01.2012 | 20.09.2021 | Health Deptt. | By promotion | Assistant |
| 241 | Mr. Muhammad Yasir | B.A. | 10.04.1984 | Abbottabad | 24.01.2012 | 20.09.2021 | Auqaf Deptt. directed to work in O/o Advisor to CM for Auqaf | By promotion | Assistant |
| 242 | Mr. Asghar Ali | B.Com | 03.11.1985 | Khyber | 24.01.2012 | 20.09.2021 | Health Deptt. | By promotion | Assistant |
| 243 | Mr. Fazal Ahad | M.A | 04.02.1990 | Malakand | 20.04.2009 | 20.09.2021 | E&AD, O/O Minister for | By promotion | Assistant |
| 244 | Ms. Sama Bukhari | D.Com | 25.03.1988 | Peshawar/ Female | 01.02.2012 | 20.09.2021 | E&SE Deptt. | By promotion | Assistant |
| 245 | Mr. Irfanullah-III S/O Muhammad Afzal | Matric | 24.04.1993 | Mardan | 01.02.2012 | 20.09.2021 | Law Deptt. | By promotion | Assistant |
| 246 | Mr. Danial Khan S/O Gul Amin | B.A | 18.08.1993 | Peshawar | 01.02.2012 | 20.09.2021 | Home Deptt. | By promotion | Assistant |
| 247 | Muhammad Shiraz-ud-Din | B.Sc | 22.10.1990 | Peshawar | 22.10.2012 | 27.05.2022 | Home Deptt. | By promotion | Assistant |
| 248 | Mr. Muhammad Sadiq Shah S/O Kiramat Shah | B.Sc | 08.06.1991 | Nowshera | 22.10.2012 | 27.05.2022 | E&Add (Policy Section) | By promotion | Assistant |
| 249 | Mr. Latif-ur-Rehman S/O Atiq ur Rehman | M.A | 25.08.1993 | Dir Upper | 22.10.2012 | 27.05.2022 | CM Sectt. | By promotion | Assistant |
| 250 | Mr. Asim Ali S/O Asghar Ali Khan | B.A | 03.02.1994 | Peshawar | 22.10.2012 | 27.05.2022 | Higher Education Deptt. | By promotion | Assistant |
| 251 | Mr. Zaheenuallah | Matric | 16.05.1985 | Karak | 13.07.2004 | 27.05.2022 | E&AD (Cabinet Section) | By promotion | Assistant |
| 252 | Mr. Said Shah S/O Said Bad Shah | F.A | 25.03.1987 | Charsadda | 22.07.2004 | 27.05.2022 | Social Welfare Deptt. | By promotion | Assistant |
| 253 | Mr. Sultane Rome | Matric | 15.09.1974 | Peshawar | 21.11.1994 | 27.05.2022 | E&AD (Accounts Branch) | By promotion | Assistant |

(53)

Tahir Ahmad
Advocate Supreme Court
Attested

(54)

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|--|------------------------|---------------|----------------|------------------------------------|--|--|------------------------------------|-----------|
| 254 | Mr. Arif Shah | Matric | 13.04.1974 | Khyber | 18.12.2004 | 27.05.2022 | On deputation to KP Culture & Tourism Authority for 03 years w.e.f 03.11.2020 to 02.11.2023. | By promotion | Assistant |
| 255 | Mr. Fayyaz Muhammad | Matric | 14.02.1971 | Peshawar | 01.10.1985 | 27.05.2022 | Social Welfare Deptt. | By promotion | Assistant |
| 256 | Mr. Noorul Amin | B.A | 19.01.1986 | Peshawar | 19.01.2005 | 27.05.2022 | Transport Deptt. | By promotion | Assistant |
| 257 | Mr. Nafees Ahmad S/O Ghulam Hafeez | Matric | 10.11.1982 | Peshawar | 16.05.2005 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 258 | Mr. Shakeel Hussain S/O Abdur Rasheed | Matric | 04.01.1971 | Nowshera | 17.05.2005 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 259 | Mr. Abdul Wali Khan S/O Muslim Khan | F.A | 06.10.1975 | Peshawar | 17.05.2005 | 27.05.2022 | Excise & Taxation Deptt. | By promotion | Assistant |
| 260 | Mr. Adrian Qureshi | FSc | 20.12.1992 | Haripur | 24.12.2012 | 27.05.2022 | E&AD (Admn Section) | By promotion | Assistant |
| 261 | Mr. Mohibullah Khan S/O Naqibullah Khan | D.Com | 13.08.1994 | Bannu | 24.12.2012 | 27.05.2022 | Governor's Sectt. | By promotion | Assistant |
| 262 | Mr. Saifullah S/O Abdul Dayan | B.A | 25.04.1994 | Charsadda | 21.12.2012 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 263 | Mr. Ali Asghar S/o Karam Dad | M.A | 01.01.1974 | Abbottabad | 15.02.2013 | 27.05.2022 | Agriculture Deptt. | By promotion | Assistant |
| 264 | Mr. Muhammad Zamir S/o Mozafar Gul | Matric | 03.02.1971 | Mardan | 15.02.2013 | 27.05.2022 | E&AD (E-II Section) | By promotion | Assistant |
| 265 | Mr. Aftab Ahmad S/o Shah Alam | B.A | 10.02.1970 | Karak | 15.02.2013 | 27.05.2022 | ST&IT Deptt. | By promotion | Assistant |
| 266 | Mr. Muhammad Tariq Khan S/o Mir Alam Jan | F.A | 03.04.1971 | Bannu | 15.02.2013 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 267 | Mr. Muhammad Farooq S/o Muhammad Anwar | Matric | 10.09.1968 | Abbottabad | 15.02.2013 | 27.05.2022 | Governor Sectt. | By promotion | Assistant |
| 268 | Mr. Nadeem Khan S/O Muhammad Mahroof Tanoli | B.A | 04.09.1976 | Mansehra | 08.03.2013 | 27.05.2022 | IPC Deptt. | By promotion | Assistant |
| 269 | Muhammad Fahad Iqbal S/O Muhammad Iqbal Awan | Matric | 11.02.1994 | D.I.Khan | 24.06.2013 | 27.05.2022 | PHE Deptt. | By promotion | Assistant |
| 270 | Mr. Fahim-ur-Rehman S/O Latif-ur-Rehman | B.A | 13.03.1992 | North Wazistan | 01.11.2013 | 27.05.2022 | Mineral Dev. Deptt. | By promotion | Assistant |
| 271 | Mr. Abbas Aziz S/O Aziz-ur-Rehman | BS (Com) | 31.08.1992 | Abbottabad | 01.11.2013 | 27.05.2022 | LGE&RD Deptt. | By promotion | Assistant |
| 272 | Mr. Muhammad Imran Khan S/O Jehanzeb Khan | MBA (HRM) | 26.03.1989 | Peshawar | 04.02.2014 | 27.05.2022 | E&AD (O/O AS (Judicial) | By promotion | Assistant |

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Fairuz Haider
Advocate Supreme Court
Attested

(55)

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|------------------------|---------------|--------------|------------------------------------|--|--|------------------------------------|-----------|
| 273 | Mr. Hammad Ahmad S/O Shabbir Ahmad | B.Com | 27.04.1991 | Charsadda | 04.02.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 274 | Mr. Muhammad Ikram S/O Jehanzeb | BSc (Hons) | 16.10.1989 | Peshawar | 20.05.2014 | 27.05.2022 | On deputation basis PMRU on 01.06.2022 to 30.06.2025 | By promotion | Assistant |
| 275 | Mr. Muhammad Tahir S/O Fazal Raziq | B.Tec (Hon) | 13.02.1990 | Malakand | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 276 | Mr. Abdul Hai S/O Khan Sher | M.Com | 10.04.1988 | Peshawar | 20.05.2014 | 27.05.2022 | P&D Deptt. | By promotion | Assistant |
| 277 | Mr. Muhammad Asif S/O Muhammad Shah | M.A | 30.05.1985 | Peshawar | 27.10.2004 | 27.05.2022 | E&AD (ASE) | By promotion | Assistant |
| 278 | Mr. Abdul Majeed S/O Haji Ahmad Khan | MSc (Encs) | 04.03.1985 | Peshawar | 20.05.2014 | 27.05.2022 | C&W Deptt. | By promotion | Assistant |
| 279 | Mr. Usama Salman S/O Intizar Bakht | MSc | 30.03.1983 | Peshawar | 20.05.2014 | 27.05.2022 | E&AD (PSB Section) | By promotion | Assistant |
| 280 | Mr. Muhammad Iqbal S/O Ghulam Muhammad | B.Com | 11.01.1983 | Peshawar | 20.05.2014 | 27.05.2022 | on deputation to PMRU for initial period of 03 years w.e.f.03.11.2022 to 02.11.2025 | By promotion | Assistant |
| 281 | Mr. Muhammad Zeb S/O Jehan Zeb | BA | 20.03.1983 | Charsadda | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 282 | Mr. Zulfiqar Ahmad S/O Raees Khan | BA | 01.05.1988 | Peshawar | 20.05.2014 | 27.05.2022 | On deputation to PSRA for 03 years w.e.f 31.05.2019 to 30.05.2022 extended to 30.05.2024 | By promotion | Assistant |
| 283 | Mr. Luqman Saeed S/O Fazli Saeed | B.Com | 15.05.1984 | Charsadda | 20.05.2014 | 27.05.2022 | CM Sectt. | By promotion | Assistant |
| 284 | Mr. Mahmood Salim S/O Qasim Khan | MCs | 27.07.1990 | Lakki Marwat | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 285 | Mr. Muhammad Abbas Khan S/O Amin Khan | M.Com | 22.04.1987 | Lakki Marwat | 20.05.2014 | 27.05.2022 | C&W Deptt. | By promotion | Assistant |
| 286 | Mr. Bashir Ahmad S/O Muhammad Yar | MA | 21.03.1986 | Bannu | 20.05.2014 | 27.05.2022 | E&SE Deptt. | By promotion | Assistant |
| 287 | Mr. Sami Ullah -Khan S/O Ajmal Khan | B.A | 20.11.1985 | Lakki Marwat | 20.05.2014 | 27.05.2022 | Home Deptt. | By promotion | Assistant |
| 288 | Mr. Ali Abbas Khan Marwat S/O Mir Abbas Khan Marwat | MCs | 21.05.1988 | Lakki Marwat | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 289 | Mr. Tahir Shah S/O Rashid Khan | B.Com | 11.04.1989 | Upper Dir | 20.05.2014 | 27.05.2022 | Relief Deptt. | By promotion | Assistant |

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Tahir Shah
Advocate Supreme Court
Attested

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|------------------------|---------------|---------------------------|------------------------------------|--|---|------------------------------------|-----------|
| 290 | Mr. Muhammad Raheem S/O Fazal E Raheem | M.A | 02.01.1992 | Malakand | 22.04.2014 | 27.05.2022 | E&AD (O/O CS) | By promotion | Assistant |
| 291 | Mr. Muhammad Azam S/O Muhammad Ayub | D.Com | 01.01.1990 | Mansehra | 20.05.2014 | 27.05.2022 | E&AD (O/O Special Assistant to CM for | By promotion | Assistant |
| 292 | Mr. Yahya Ullah S/O Rahmat Dool | M.A | 06.02.1989 | Chitral | 20.05.2014 | 27.05.2022 | E&AD (R-III Section) | By promotion | Assistant |
| 293 | Mr. Muhammad Naveed S/O Khan Afsar | BSc | 08.03.1991 | Haripur | 20.05.2014 | 27.05.2022 | STI - E&AD | By promotion | Assistant |
| 294 | Mr. Tahir Javed S/O Asghar Javed | BA | 28.04.1992 | Abbottabad | 20.05.2014 | 27.05.2022 | Agriculture Deptt. | By promotion | Assistant |
| 295 | Mr. Najeem Ullah S/O Shams Ul Qamar Baig | BA | 04.03.1987 | Chitral | 20.05.2014 | 27.05.2022 | P&D Deptt. | By promotion | Assistant |
| 296 | Mr. AWAIS KHAN S/O HABIB UR REHMAN | BA | 31.03.1992 | Haripur | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 297 | Mr. Sajad Muhammad Khan S/O Muhammad Khan | BA | 13.09.1991 | Lakki Marwat | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 298 | Mr. Zulfiqar Wali Khan S/O Wali Zar Khan Wali | BA | 16.10.1987 | Chitral | 20.05.2014 | 27.05.2022 | Law Deptt. | By promotion | Assistant |
| 299 | Mr. Zubair Shah S/O Mirkha Jan | M.A | 14.08.1990 | Mohmand | 20.05.2014 | 27.05.2022 | E&AD (O/o SSE) | By promotion | Assistant |
| 300 | Syed Fawad Rashid S/O Syed Haroon Rashid | B.A | 15.11.1990 | Swat | 20.05.2014 | 27.05.2022 | Law Deptt. | By promotion | Assistant |
| 301 | Mr. Ikram Ullah S/O. Haji Saad Ullah | D.Com | 22.03.1991 | Khyber | 20.05.2014 | 27.05.2022 | E&AD (perform duty in the O/O Minister for Food & ST&IT | By promotion | Assistant |
| 302 | Mr. Muhammad Shafiq S/O Gul Rasool | M.A | 01.05.1985 | Bajaur | 20.05.2014 | 27.05.2022 | Finance Deptt. | By promotion | Assistant |
| 303 | Miss. Tina Marry D/O Akram Nadeem | B.A | 15.03.1987 | Peshawar/ Female Quota | 20.05.2014 | 27.05.2022 | E&AD (O/o Secy (Estt) | By promotion | Assistant |
| 304 | Mr. Niaz Muhammad S/O Wazir Muhammad | M.A | 10.02.1989 | Mohmand | 20.05.2014 | 27.05.2022 | C&W Deptt. | By promotion | Assistant |
| 305 | Mr. Muhammad Shoaib Afridi S/O Muhammad Yar | B.A | 18.08.1989 | Khyber | 20.05.2014 | 27.05.2022 | Industries Deptt. | By promotion | Assistant |
| 306 | Mr. Maroof Khan S/O Fazl E Nabi | B.A | 18.04.1991 | Mohmand | 20.05.2014 | 27.05.2022 | E&AD (O/O AS Admn-I) | By promotion | Assistant |
| 307 | Mr. Qazi Muhammad Khalid S/O Qazi Muhammad | FA | 05.01.1994 | Khyber | 20.05.2014 | 27.05.2022 | Housing Deptt. | By promotion | Assistant |
| 308 | Muhammad Abubakar S/O Muhammad Ajmal Khan | BA | 11.03.1985 | Karak | 18.07.2014 | 27.05.2022 | Health Deptt. | By promotion | Assistant |

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Attested
Advocate Supreme Court

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TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt. service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---|------------------------|---------------|--------------|------------------------------------|--|---|------------------------------------|-----------|
| 309 | Mr. Amjad Ali S/O Jangi Khan | B.Com | 05.08.1992 | Lakki Marwat | 18.07.2014 | 27.05.2022 | Excise & Taxation Deptt. | By promotion | Assistant |
| 310 | Mr. Zahid Khan S/O Abdul Akbar | FSc | 15.04.1990 | Shangla | 18.07.2014 | 27.05.2022 | Health Deptt. | By promotion | Assistant |
| 311 | Mr. Islam Sher S/O Hassan Sher (Late) | B.A | 20.09.1983 | Peshawar | 06.01.2015 | 27.05.2022 | E&SE Deptt. | By promotion | Assistant |
| 312 | Mr. Usman Wali Khan S/O Mas Wali Khan | FSc | 01.05.1993 | Chitral | 06.01.2015 | 27.05.2022 | Directorate of Sports on deputation basis w.e.f. 06.07.2022 to 05.07.2025 | By promotion | Assistant |
| 313 | Mr. Muhammad Ibrahim S/O Hazrat Shah (Late) | Matric | 11.02.1993 | Peshawar | 06.01.2015 | 27.05.2022 | E&SE Deptt. | By promotion | Assistant |
| 314 | Mr. Sajeemullah Khan S/O Mir Alam Khan (Late) | Matric | 28.02.1995 | Lakki Marwat | 06.01.2015 | 27.05.2022 | Agriculture Deptt. | By promotion | Assistant |
| 315 | Mr. Muhammad Awais S/O Abdul Aziz (Late) | FSc | 28.06.1995 | Peshawar | 06.01.2015 | 27.05.2022 | Administration Deptt. | By promotion | Assistant |
| 316 | Mr. Muhammad Saqib S/O Inayatullah (Late) | B.A | 06.03.1996 | D.I Khan | 06.01.2015 | 27.05.2022 | Governor Sectt. | By promotion | Assistant |
| 317 | Mr. Khan Muhammad S/O Mughal Khan | Matric | 13.06.1968 | Charsadda | 25.04.1995 | 27.05.2022 | Transport Deptt. | By promotion | Assistant |
| 318 | Mr. Salahud Din S/o Sar Gul | F.A | 11.09.1970 | Bannu | 15.02.2013 | 15.12.2022 | Livestock Deptt. | By promotion | Assistant |
| 319 | Mr. Abdul Hanan S/o Alam Shah | F.A | 02.04.1973 | Khyber | 15.02.2013 | 15.12.2022 | Social Welfare Deptt. | By promotion | Assistant |
| 320 | Mr. Khan Muhammad S/o Yar Muhammad | Matric | 12.04.1976 | Mohmand | 15.02.2013 | 15.12.2022 | Food Deptt. | By promotion | Assistant |
| 321 | Mr. Muhammad Tariq Rasheed S/O Abdul Rasheed | M.Com | 27.03.1994 | Mansehra | 20.05.2014 | 15.12.2022 | On deputation to Galiyat Development Authority w.e.f 04.09.2020 to 03.09.2023 for 03 years. | By promotion | Assistant |
| 322 | Mr. Tahseen Ullah S/O Sad Ullah. | B.Com | 15.01.1989 | Khyber | 20.05.2014 | 15.12.2022 | E&AD (Transport Section) | By promotion | Assistant |
| 323 | Mr. Sajid Ali Shah | Matric | 07.01.1982 | Nowshera | 02.11.2015 | 15.12.2022 | Finance Deptt. | By promotion | Assistant |
| 324 | Mr. Zafar Khan | Matric | 21.03.1982 | Mardan | 02.11.2015 | 15.12.2022 | Agriculture Deptt. | By promotion | Assistant |
| 325 | Mr. Muhammad Javed S/O Khuda Bakhsh | Matric | 11.05.1979 | D.I.Khan | 28.01.2016 | 15.12.2022 | Finance Deptt. | By promotion | Assistant |


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Tahseen Ullah
Advocate Supreme Court
Attested

TENTATIVE SENIORITY LIST OF ASSISTANTS (BS-16) OF CIVIL SECRETARIAT, PESHAWAR (AS STOOD ON 19.01.2023).

| S.No. | Name of official | Academic Qualification | Date of Birth | Domicile | Date of 1st Entry in Govt: service | Date of Apptt./ Promotion as Assistant | Department | Method of Recruitment/ Appointment | Remarks |
|-------|---------------------------------------|------------------------|---------------|----------------------|------------------------------------|--|---|------------------------------------|-----------|
| 326 | Mr. Shakeel Khan S/O Muhammad Hamayun | Matric | 01.01.1983 | Mardan | 02.11.2015 | 15.12.2022 | Information Deptt. | By promotion | Assistant |
| 327 | Mr. Haider Ali | Matric | 01.02.1982 | Peshawar | 02.11.2015 | 15.12.2022 | Culture, Tourism, Archaeology & Museum Deptt. | By promotion | Assistant |
| 328 | Mr. Yousaf Khan S/O Momeen Khan | B.A | 01.04.1984 | Peshawar | 02.11.2015 | 15.12.2022 | Culture, Tourism, Archaeology & Museum Deptt. | By promotion | Assistant |
| 329 | Mr. Zain Khan | Matric | 20.11.1970 | Peshawar | 02.11.2015 | 15.12.2022 | E&SE Deptt. | By promotion | Assistant |
| 330 | Mr. Bahrullah | Matric | 01.01.1978 | Peshawar | 02.11.2015 | 15.12.2022 | E&SE Deptt. | By promotion | Assistant |
| 331 | Mr. Rahat Ullah | Matric | 01.04.1976 | Peshawar | 28.01.2016 | 15.12.2022 | Higher Education Deptt. | By promotion | Assistant |
| 332 | Mr. Abid Munir | F.A | 05.06.1981 | Peshawar | 02.11.2015 | 15.12.2022 | Irrigation Deptt. | By promotion | Assistant |
| 333 | Mr. Hidayatullah S/O SAHIB ULLAH | Matric | 09.04.1977 | Peshawar | 02.11.2015 | 15.12.2022 | Finance Deptt. | By promotion | Assistant |
| 334 | Mr. Safdar Jamil | Matric | 30.04.1978 | Peshawar | 02.11.2015 | 15.12.2022 | Health Deptt. | By promotion | Assistant |
| 335 | Mr. Wahab Ali | Matric | 08.02.1978 | Charsadda | 02.11.2015 | 15.12.2022 | IPC Deptt. | By promotion | Assistant |
| 336 | Mr. Rahat Khan | Matric | 16.09.1971 | Peshawar | 02.11.2015 | 15.12.2022 | Sports & Youth Affairs | By promotion | Assistant |
| 337 | Mr. Shakeel Ghulam | Matric | 30.04.1981 | Peshawar Minority | 02.11.2015 | 15.12.2022 | PHE Deptt. | By promotion | Assistant |

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 TARIK HANIF
 Advocate Supreme Court
 Attest

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10
Anwar



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(REGULATION WING)**

No. SO(Policy)/E&AD/2-3/General
Dated Peshawar, the April 04, 2023

To

1. The Additional Chief Secretary, P&D Department.
2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
4. All Divisional Commissioners in Khyber Pakhtunkhwa.
5. All Deputy Commissioners in Khyber Pakhtunkhwa.
6. All Heads of Attached Departments.
7. All Heads of Autonomous/Semi-Autonomous Bodies in Khyber Pakhtunkhwa.
8. The Registrar, Peshawar High Court, Peshawar.
9. The Registrar, Khyber Pakhtunkhwa Services Tribunal.
10. The Secretary, Khyber Pakhtunkhwa Public Service Commission.

Subject: - INSTRUCTIONS REGARDING PROCESSING OF PROMOTION CASES AND HOLDING OF THE MEETINGS OF DEPARTMENTAL PROMOTION COMMITTEE/ PROVINCIAL SELECTION BOARD.

Dear Sir,

I am directed to refer to the subject noted above and to state that section 230(2) of the Election Act, 2017 provides, inter alia, that Caretaker Government shall not make promotion or major appointments of public officials but may make acting or short term appointments in the public interest. Therefore the Election Commission of Pakistan was approached for necessary guidance as to whether meetings of PSB/DPC can be held or otherwise to consider promotion cases of the officers/officials who are otherwise eligible for promotion. The Commission vide its letter bearing No. F.10(1)/2023-Elec-II dated 11.03.2023 (copy enclosed) has conveyed that the Honorable Commission has been pleased to accede to the request made by the Provincial Government.

2. I am therefore directed that all the Provincial Government Departments may process the cases accordingly.

Yours faithfully,


Issa Muhammad Khan
Section Officer (Policy)


Advocate General
Enclosed As Above.

Copy forwarded to the:

1. PS to Secretary Establishment Department.
2. PS to Special Secretary (Regulation), Establishment Department.
3. PA to Additional Secretary (Reg-II), Establishment Department.
4. PA to Deputy Secretary (Policy), Establishment Department.


Section Officer (Policy)

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No.F.10 (1)/2023-Elec-II
ELECTION COMMISSION OF PAKISTAN



Secretariat,
Constitution Avenue, G-5/2,
Islamabad, 11th March, 2023.

To,

The Additional Secretary (Regulation-II),
Establishment Department,
Regulation Wing,
Government of Khyber Pakhtunkhwa.

Subject: - REQUEST FOR GUIDANCE WITH REGARD TO PROCESSING OF PROMOTION
CASES AND HOLDING OF THE MEETING OF DEPARTMENTAL PROMOTION
COMMITTEE/PROVINCIAL SELECTION BOARD.

Dear Sir,

I am directed to refer to your letter No. SO(Policy)/E&D/2-3/General
24th February, 2023, on the subject cited above and to say that the Hon'ble Commission has
been pleased to accede your request made vide above, referred letter.

Yours sincerely,

Tauqir Iqbal
(Tauqir Iqbal)
Deputy Director (Election-II)

Tauqir Iqbal
Advocate Supreme Court
Attested



(61)

Ref.# _____

POWER OF ATTORNEY

Date: _____

BEFORE THE HON'BLE SERVICE TRIBUNAL, PESHAWAR

Harif ur Rehman

(Petitioner)
(Appellant)
(Plaintiff)

Versus

Govt of K.P. through Chief Secretary & other.

(Defendant)
(Respondent)

I/We, the undersigned do hereby nominate and appoint

TAIMUR HAIDER KHAN
ADVOCATE, SUPREME COURT

On behalf of **APPELLANT**

Know all to whom these presents shall come that I/We the undersigned appoint; the above named Advocate in District Peshawar, in the above mentioned case to do all the following acts, deeds and things.

1. To act, appear and plead in the above mentioned case in this court or any other court in which same may be tried or heard in the first instance or in appeal or review or revision or application or at any other stage of its progress until its final decision.
2. To present pleadings, appeals, case objection or petitioners for execution, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution/defence of the said case at all stages.
3. To withdraw or compromise the said case or submit to arbitration any difference or disputes that shall arise touching or any manner relating to said cause.
4. To employee, authorize any other legal practitioner to assist or exercise the power in authority hereby conferred on the advocate whenever he may think to do so.

AND I/We, hereby agree to ratify whatever the advocate or his substitute shall do in this behalf and I/We hereby agree not to hold the advocate or his substitute responsible for the result of the case in consequences of his absence from the Court when the said case is called up for hearing.

AND I/We in case of expiry of the said advocate any full fee or part payment thereof, will not claim in any manner whatsoever, or in case of disengagement of the said advocate will not make any claim regarding fee.

Mob. 0303-8262855

Taimur Haider Khan
(Signature/thumb impression of the Executant)

Dated: 11-9-2023
Accepted subject of the terms
And full payment of Settlement Fee

Harif ur Rehman CNIC
21103-9749311-1
Assistant (BPS-16) at climate change
Forestry, environment & wildlife Department
at Civil Secretariat Peshawar

Taimur Haider Khan
Advocate Supreme Court
Attested by [Signature]