

15.02.2023

Appellant alongwith junior of his counsel present. Mr. Ghulam Mustafa, Superintendent alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondent present. Learned counsel for private respondents No. 2 & 3 also present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 22.05.2023 before the D.B.

SCANNED  
POST  
PESHAWAR



(Fareeha Paul)  
Member (E)




(Salah-ud-Din)  
Member (J)

31<sup>st</sup> Oct., 2022

Assistant to counsel for the appellant present. Mr. Naseerud Din Shah, Assistant Advocate General for respondents present.

Learned counsel for the appellant seeks adjournment in order to further prepare the brief. Adjourned To come up for arguments on 28.11.2022 before the D.B.

  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman


28<sup>th</sup> Nov. 2022


Counsel for the appellant present. Mr Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

**SCANNED**  
**KPST**  
**Peshawar**

Learned counsel for the appellant seeks adjournment in order to further prepare the brief. Granted but as last chance.

To come up for arguments on 15.02.2022 before the D.B.

  
(Fareeha Paul)  
Member (E)

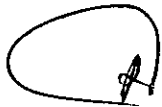
  
(Kalim Arshad Khan)  
Chairman

03.11.2021

Junior to counsel for appellant present.

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

Request for adjournment was made on behalf of appellant as senior counsel is not available today. Request is accorded. To come up for arguments on 08.02.2022 before D.B.



(Rozina Rehman)  
Member (J)



Chairman

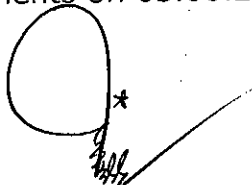
8-2-2022

Due to retirement of hon'ble Chairman the case is adjourned to come up for the same as before on 30-5-2022

30<sup>th</sup> May, 2022

Appellant alongwith counsel present. Mr. Muhammad Riaz, Painsdakhel, Assistant AG alongwith Raza ullah Assistant for the respondents present.

Learned counsel for the appellant seeks adjournment in order to properly assist the Court. Appeal pertains to the year 2019, therefore, last opportunity is granted. To come up for arguments on 03.08.2022 before the D.B.



(Mian Muhammad)  
Member(E)



(Kalim Arshad Khan)  
Chairman

3-8-2022

Proper DB not available the case is adjourned to 31-10-2022

Reads

01.06.2021

Nemo for appellant.

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

Bench is incomplete as learned Member Executive (Mian Muhammad) is on leave, therefore, case is adjourned to 16.08.2021 for hearing before D.B. Appellant/counsel be put on notice for the date fixed.

  
(Rozina Rehman)  
Member(J)

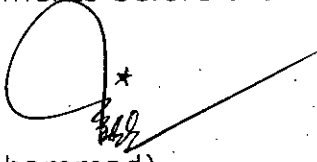
16.08.2021

Since 16.08.2021 has been declared as Public holiday on account of Moharram, therefore, case is adjourned to 29.10.2021 for the same as before.

  
Reader

29.10.2021

Learned counsel for the appellant present. Mr. Javed Ullah, Assistant Advocate General for official respondent No. 1 present. Mr. Noor Muhammad Khattak, Advocate, for private respondents No. 2 & 3 present and requested that the appeal in hand may be fixed for arguments in next week as respondents No. 2 & 3 are going to retire from service on next Friday. Adjourned. To come up for arguments before the D.B on 03.11.2021.


  
(Mian Muhammad)  
Member (E)

  
(Salah-Ud-Din)  
Member (J)

29.10.2020

Junior to counsel for the appellant, Addl. AG alongwith Razaullah, Head Clerk for official respondents and private respondent No. 2 in person present.

The Bar is observing general strike, therefore, the matter is adjourned to 21.12.2020 for hearing before the D.B.

  
(Atiq-ur-Rehman Wazir)  
Member

  
Chairman

21.12.2020

Junior to counsel for the appellant present. Addl: AG for respondents present.


Due to pandemic of Covid-19, the case is adjourned to 22.03.2021 for the same.

  
Reader

22.03.2021

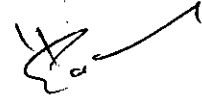
Counsel for the appellant and Asstt. AG for the respondents present.

Former requests for adjournment in order to further prepare the brief. Adjourned to 22.06.2021 for hearing before the D.B.

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

  
Chairman

17.01.2020 Appellant in person present. Raza Ullah Head Clerk representative of the respondent department present. Lawyers community is on strike on the call of Khyber Pakhtunkhwa Bar Council. Learned Member (Executive) is not available. Adjourned for 25.03.2020 before D.B.



Member

25.03.2020 Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 12.06.2020 before D.B.



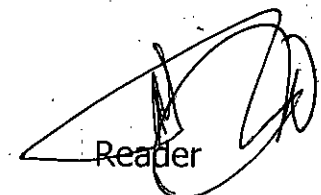
Reader

12.06.2020 Bench incomplete. Therefore, the case is adjourned. To come up for the same on 25.08.2020 before D.B.



Reader

25.08.2020 Due to summer vacation case to come up for the same on 29.10.2020 before D.B.



Reader

17.09.2019

Appellant in person, Addl. AG alongwith Razauallah Levy H.C for respondent No. 1 and respondents No. 2 & 3 in person present.

Respondents No. 2 & 3 again requests for time for submission of requisite reply. Last opportunity is granted to respondents No. 2 & 3 for submission of written reply/comments on 09.10.2019 before S.B.

Chairman



09.10.2019

Counsel for the appellant and Addl. AG alongwith Razauallah, H.C for respondent No. 1 and respondents No. 2 & 3 in person present.

Respondents No. 2 & 3 have furnished their joint reply which is placed on record. The appeal is assigned to D.B for arguments on 18.12.2019. The appellant may submit rejoinder, within a fortnight, if so advised.

Chairman



18.12.2019

Appellant in person present. Mr. Muhammad Jan learned Deputy District Attorney present. Appellant seeks adjournment as his counsel is not in attendance. Adjourn. To come up for arguments on 17.01.2020 before D.B.

Member



Member



20.06.2019

Appellant in person present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Raza Ullah, Clerk on behalf of official respondent No. 1 and Mr. Noor Muhammad Khattak, Advocate on behalf of private respondents No. 2 & 3 present and submitted his Vakalatnama. Written reply on behalf of official respondent No. 1 has already been submitted. Learned counsel for private respondents No. 2 & 3 requested for further adjournment to submit written reply. Adjourned. Case to come up for written reply/comments on behalf of private respondents No. 2 & 3 on 02.08.2019 before S.B.

  
(Muhammad Amin Khan Kundi)  
Member

02.08.2019 Appellant with counsel, Mr. Usman Ghani, District Attorney alongwith Mr. Mushtaq, Senior Clerk for official respondent no.1 and counsel for private respondents no. 2 and 3 present. Written reply/comments on behalf of the respondents no.2 and 3 not submitted, Learned counsel for private respondents no. 2 and 3 requests for further time to submit written reply/comments.

Adjourned to 17.09.2019 before S.B.

  
(Ahmad Hassan)  
Member



29.03.2019

Appellant in person present. Written reply not submitted. Ghulam Mustafa Superintendent representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 30.04.2019 before S.B



Member

30.04.2019

Appellant in person and Mr. Usman Ghani District Attorney alongwith Mushtaq Ahmad, Senior Clerk for the official respondents and private respondents No. 2 & 3 in person present.

Representative of respondent No. 1 has submitted parawise comments on behalf of respondent No. 1. The same are placed on record. Private respondents No. 2 & 3 request for adjournment.

Adjourned to 20.06.2019 on which date written reply/comments of respondents No. 2 & 3 shall positively be submitted.



Chairman

07.02.2019

Counsel for the appellant present.

Contends, inter-alia, that the corrigendum order to the original office order dated 14.11.2016, regarding promotion, was issued on 27.3.2018. The impugned order of corrigendum was passed after lapse of about two years, whereby, the prospective promotion of appellant was hindered. The appellant had duly submitted his reservations in response to notice by respondent No. 1 regarding the alteration/corrigendum; however, the same were totally disregarded by the said respondents.

Apparently there is a delay in submission of service appeal in hand, however, in view of submissions by learned counsel and the available record, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 28.03.2019 before S.B.

Appellate Deposited  
Security & Process Fee





Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 25/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/1/2019	<p>The appeal of Mr. Muhibullah presented today by Syed Dawran Shah Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 8/01/19</p>
2-	16-1-19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>07-2-2019</u>.</p> <p> CHAIRMAN</p>

**BEFORE THE HONORUABLE SERVICES TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 25 of 2019

Muhib Ullah


VERSUS

Commandant Dir Levies/Deputy Commissioner District Upper Dir

I N D E X

S.No	Description of Documents	Annexure	Pages
1.	<i>Memo of Service Appeal</i>		1-4
2.	<i>Affidavit</i>		5
3.	<i>Addresses of the parties</i>		6
4.	<i>Copy of Promotion Order dated: 14/11/2016</i>	A	7-9
4.	<i>Copy of impugned Order Dated: 27/3/2018</i>	B	10
5.	<i>Copy of application filled by Resplendent No. 2 and 3</i>	C	11
6.	<i>Copy of application/reply filled by Appellant's</i>	D	12
7.	<i>Copy application dated: 28/3/2018 filled by Appellant's</i>	E	13-14
8.	<i>Copy of Seniority List</i>	F	14-17
9.	<i>Copy of other Documents</i>		18-21
10.	<i>Wakalat Nama</i>		

Appellant

Through  
  
Syed Dawran Shah

Dated: 03/06/2016

Advocate, High Court Peshawar  
Cell No. 0300-5985384

Office Room No.109-B, Town Tower, Jahangir  
Abad University Road, Peshawar.

**BEFORE THE HONORUABLE SERVICES TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Services appeal No. \_\_\_\_\_/2019

1. MuhibUllah S/O Jamrooz Khan (naib subidar)  
Dir Levies District Upper Dir KPK

llant.....

*Versus*

1. Commandant Dir Levies/Deputy Commissioner District Up

2. Gul Badshah S/O Khaist Muhammad (naib subidar) Ds District  
Upper Dir

3. Jehan Zeb S/O Bacha Sardar (naib subidar) Dir Levies Diser Dir

ments.....

**APPEAL UNDER SECTION 4 OF THE K**  
**PAKHTUNKHWA SERVICE TRIBUNAL AC3**  
**AGAINST THE OFFICE ORDER/CORRIGEM**  
**NO:7375-80/DC/LHC DATED:27/03/2018 ISSU**  
**DEPUTY COMMISSIONER/COMMANDANT**  
**LEVIES DISTRICT UPPER DIR WHEREBY OCE**  
**ORDER NO:16059-63/DC/LHC/OFFICE ORDE**  
**DATED 14/11/2016 WAS ORDERED TO BE RE AS**  
**9/11/2016 INSTEAD OF 14/11/2016 FROM SIAL**  
**NO.1 TO SERIAL NO.3 I.E IN RESPEC OF**  
**RESPNDENT NO.2 AND 3**

Respectfully Sheweth,

1. That the appellant is naib subidar in DIR LEVIES KPK and serving under the command of Deputy Commissioner Upper Dir.
2. That the appellant was promoted to the rank of naib subidar as per the recommendation of departmental promotion committee meeting held on 4/11/2016 and notified on 14/11/2016 issued from the office of Commandant/Deputy Commissioner Upper DIR.( copy of office order no:16059-63/dc/LHC/office order/2016 dated 14/11/2016 is attached as annexure-A)
3. That respondent No 2 and 3 submitted an application to respondent no 1 for the review of the date of notification i.e. 14/11/2016 and requested that the same may be read as 9/11/2016 for the purpose of getting further promotion.(copy of application filed by Respondent No.2 and 3 is Annexure-B)
4. That the appellant filed reply/application to respondent No.1 that the date mentioned in office order no:16059-63 i.e. 14/11/2016 is absolutely correct and requested that the same may not be changed .(copy of application filed by appellant to Respondent No1 is annexure-C)
5. That Respondent No.1, while allowing the application of Respondent No.2 and 3 issued the impugned order/corrigendum no:7375-80 dated 27/3/2018 and ordered that the date of notification/office order no:7375-80 be read as 9/11/2016 instead of 14/11/2016 only in respect of Respondent No.2 and 3.(copy of office order no:7375-80 dated 27/3/2018 is Annexure-D)
6. That against the corrigendum/office order mentioned above and for the purpose of restoration of previous order dated 14/11/2016 mentioned above, appellant filed application to the Deputy commissioner/commandant Levies Upper Dir followed by several visits to Respondent No. 1 to set aside/modify the Corrigendum /Office Order and restore the Original office Order but until now no Order has been made upon that application and request of the appellant, hence this Appeal.(Copy of application Dated: 28/3/2018 is Annexure-E)
7. That feeling aggrieved from the corrigendum dated 27/3/2018 and having no other adequate and efficacious remedy, appellant is filing the instant appeal inter alia on the following grounds:

**Grounds:**

- a. That according to the seniority list issued in December 2017 Respondent No. 2 and 3 shall stand retired on 11/11/2021 while appellant shall retire on 14/11/2023 meaning there by that the promotion chances of the appellant will be more than the respondent's No. 2 and 3.(Copy of Seniority List is Annexure-F)
- b. That the corrigendum/order dated 27/3/2018 is against Law, Rules, Regulations, Policy and against Service Laws as well and is thus liable to be set aside/ varied.
- c. That the Act of respondent No. 1 is against the fundamental rights of the appellant and discriminatory in nature which needs to be set at naught.
- d. That the corrigendum/Office order referred above is in fact an amended order of the previous office order dated 14/11/2016 which is made malafidely by Respondent No.1 just to accommodate the blue eyed persons.
- e. That the corrigendum order dated 27/3/2018 has been given retrospective effect which is illegal, unlawful and void ab-initio.
- f. That the corrigendum order mentioned above has the effect of nullifying the legitimate expectation of appellant to be promoted to the next higher rank and this order is completely blocking all means of appellant's future promotion.
- g. That the purpose of a corrigendum ought to be to correct an apparent error or any typographical mistake and not to take away the legitimate right of any person. While in the instant case the corrigendum order adversely affected the legitimate expectation of promotion of the appellant which tantamount to miscarriage of justice and the said corrigendum order needs to be set aside/ modified.
- h. That office order No.16059-63 was issued on 14/11/2016 while the corrigendum No. 7375-80 was issued on 27/3/2018 with an unexplained delay which clearly shows the malafide intentions of the Respondents.
- i. That the matter of promotion is a recurrent cause of action and every denial of the respondents affecting the promotion of the appellant gives a fresh cause of action to the appellant. More over the corrigendum order, being a void order, is not sustainable in the eye of Law.
- j. That appellant approached the respondent many times and requested them to settle the matter according to Law, Rules and Regulations and further requested them to restore original Office Order dated 14/11/2016 but they

are deferring the matter on one pretext or another and lastly a few days ago refused to restore the original order which is illegal and unlawful.

k. That any other ground available to the appellant may be raised at the time of arguments with the prior permission of this Hon'ble Court.

It is therefore most humbly prayed that on acceptance of the instant appeal, Office order/corrigendum no: 7375-80/DC/LHC dated:27/03/2018 may kindly be set aside/ modified and office order no: 16059-63/dc/LHC/office order/2016 dated 14/11/2016 may kindly be restored in the best interest of justice.

Any other relief not specifically prayed for and is available to the appellant may also be awarded.

Appellant


Through



**Syed Dawran Shah**

**Advocate High Court**

And



**Shahid Hassan Akhunzada**

**Advocate Peshawar**



**BEFORE THE HONORUABLE SERVICES TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2019

**MuhibUllah**

**VERSUS**

**Commandant Dir Levies/Deputy Commissioner District Upper Dir**

**Affidavit**

I, MuhibUllah S/O JamroozKhan (naib subidar) Dir Levies District Upper Dir KPK do hereby solemnly affirm and declare on Oath that the contents of the accompanied Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*Deponent*

*MuhibUllah*

*CNIC#15701-5936702-9*

*Identified by*

  
*Syed Dawran Shah*

*Advocate High Court*

*Peshawar*

**BEFORE THE HONORUABLE SERVICES TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. \_\_\_\_\_ of 2019

MuhibUllah

Appellant.....

VERSUS

Commandant Dir Levies/Deputy Commissioner District Upper Dir

Respondents.....

**ADDRESSES OF THE PARTIES**

**Appellant**

1. MuhibUllah S/O Jamrooz Khan (naib subidar) Dir Levies District Upper Dir KPK

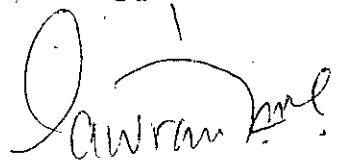
**Respondents**

- 1) Commandant Dir Levies/Deputy Commissioner District Upper Dir
- 2) Gul Badshah S/O Khaist Muhammad (naib subidar) Dir Levies District Upper Dir
- 3) Jehan Zeb S/O Bacha Sardar (naib subidar) Dir Levies District Upper Dir

Dated: 4/01/2019

Appellant

Through

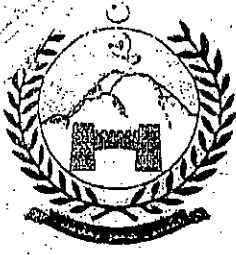


**Syed Dawran Shah**

**Advocate**

**High Court, Peshawar**

Annexure "A" ①



OFFICE OF THE  
COMMANDANT/DEPUTY COMMISSIONER  
UPPER DIR

No: 16059-63/DC/LHC/Office order/2016

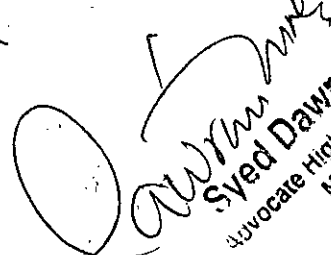
Dated Dir the: 14/11/2016.



OFFICE ORDER

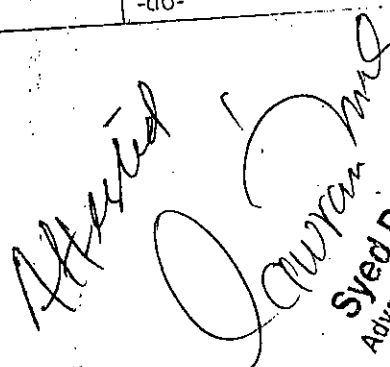
Consequent upon the recommendation of Departmental Promotion Committee meeting held on 04.11.2016 circulated vide letter No: 15567-68/DC/LHC/DPC meeting dated 07.11.2016. The following levy Personnel (Federal) are hereby promoted to the rank mentioned against each with immediate effect.

#	NAME OF OFFICIAL	FATHER NAME	PRESENT RANK	PROMOTED AS
1	Jehan Zeb	Shah Nawaz	N.Subidar	Subidar
2	Khaista Said	Swal Faqir	N.Subidar	Subidar
3	Rehman Uddin	Shah Zada	N.Subidar	Subidar
4	Izzat Khan	Sadat Khan	Hawaladar	N.Subidar
5	Mazhar Shah	Ali Haider	Hawaladar	N.Subidar
6	Muhaib Ullah	Jamroz Khan	Hawaladar	N.Subidar
7	Nasib Zada	Khan Zada	L.Naik	Naik
8	Naeem Ullah	Fazal Wahid	-do-	-do-
9	Jamal Shah	Shah Zamin Khan	-do-	-do-
10	Saeed ur Rahaman	Muhammad Yar	-do-	-do-
11	Shoukat Ali	Rahman Gul	-do-	-do-
12	Sajid Ullah	Muhammad Irshad	-do-	-do-
13	Rafi Ullah	Nadar Saeed	-do-	-do-
14	Bakht Rawan	Amir Rahman	-do-	-do-
15	Naveed Khan	Khalid Khan	-do-	-do-
16	Amin Ullah	Ranja Khan	-do-	-do-
17	Gul Hasan	Rasool Khan	-do-	-do-
18	Gul Sahib Zada	Muhammad Arif	-do-	-do-
19	Afzal Khan	Bazir Khan	-do-	-do-
20	Ikram ul Haq	Amin ul Haq	-do-	-do-
21	Muhammad Baz	Saeed Azim	-do-	-do-
22	Iftekhar Ali	Dilawar Khan	-do-	-do-
23	Alif Khan	Qadar Khan	-do-	-do-
24	Muhammad Munir	Amin Ullah	-do-	-do-
25	Hanif ur Rehman	Said Rahman	-do-	-do-
26	Muhammad Zubir	Umar Yar	-do-	-do-
27	Anwar Zeb	Amin Zada	-do-	-do-
28	Nasir Ullah	Asaf Khan	-do-	-do-
29	Umar Zada	Muhammad Sherin	-do-	-do-
30	Nasrullah	Bacha Zada	-do-	-do-
31	Khaista Rahmtan	Ghulam Hazrat	-do-	-do-

*Affected*  
  
**Syed Dawran Shah**  
 Advocate High Court Peshawar  
 M.A., L.L.B.

8

Alam Zeb	Sultan Muhammad	-do-	-do-
Fazal Rahman	Saifur Rahman	-do-	-do-
Kalim Ullah	Bahadar Khan	-do-	-do-
Muhammad Nisar	Muhammad Israr	-do-	-do-
Farman Ullah	Atta Ullah	-do-	-do-
Zubir	Aman Ullah Khan	-do-	-do-
Mushtaq Ahmad	Said Jan	-do-	-do-
Abdul Wahab	Amin Ur Rahman	-do-	-do-
Sultan Uddin	Muhammad Saeed	-do-	-do-
Ibrar Khan	Amin Khan	-do-	-do-
Nazir Ahmad	Muhammad Zamin	-do-	-do-
Ilyas Khan	Zamin Khan	-do-	-do-
Muhammad Ibrahim	Muhammad Ghani	-do-	-do-
Rahim Shah	Bacha Muhammad	-do-	-do-
Asadullah	Muhamamd Rahim	-do-	-do-
Imran Khan	Murad Khan	Sepoy	-do-
Zakir Ali	Sher Ghani	-do-	-do-
Samiu Rehman	Khaista Rehman	-do-	-do-
Inamullah	Yar Muhammad	-do-	-do-
Fazal Zada	Zardad Jan	-do-	-do-
Taj Rasool	Abbas Khan	-do-	-do-
Amjad Ali	Gul Azim	-do-	-do-
Khayal Zada	Shahzol	-do-	-do-
Karimullah	Naseeb Gul	-do-	-do-
Shahabuddin	Nasirudin	-do-	-do-
Samiullah	Masaf Khan	-do-	-do-
Zahid Rehman	Habib Rehman	-do-	-do-
Wahidullah	Shahzol Khan	-do-	-do-
Kalimullah	Muhammad Anwar	-do-	-do-
Bakht Rawan	Amroz Khan	-do-	-do-
Naveed Akhter	Ghulam Haider	-do-	-do-
Mubarak Bakht	Sultan Bakht	-do-	-do-
Irfanullah	Mutabar Khan	-do-	-do-
Gohar Jan	Gul Habibi Jan	-do-	-do-
Nisar Ahmad	Khaista Rehman	-do-	-do-
Samiu Rehman	Sahah Zol Fateh	-do-	-do-
Faiz ur Rehman	Jan	-do-	-do-
69	Muhammad Amin Khan	-do-	-do-
70	Khan Wali	-do-	-do-
Naveed Akhter	Muhammad Nisar	-do-	-do-
71	Said Nawab	-do-	-do-
72	Shahidullah	-do-	-do-
73	Fazal Wahid	-do-	-do-
74	Waseem Sajjad	-do-	-do-
	Amin Zada	-do-	-do-

  
**Syed Dawran Shah**  
 Advocate High Court Peshawar  
 M.A., LL.B.

9

Muhammad Saeed	Raz Muhammad	-do-	-do-
Hanifur Rehman	Bakht Shahzada	-do-	-do-
Shah Javaid	Bakht Zamin Khan	-do-	-do-
Naik Zada	Rehmanullah	-do-	-do-
Faiz Rehman	Azim Jan	-do-	-do-
Rohul Amin	Rohuddin	-do-	-do-
Hussian Shah	Shah Tamriz	-do-	-do-
Najmuddin	Nizamuddin	-do-	-do-
Misbahuddin	Salahuddin	-do-	-do-
Ajmal Ali Khan	Shahu Din	-do-	-do-

(Muhammad Usman Mehsud, PAS)  
Commandant Levies Force/  
Deputy Commissioner  
Dir Upper.

Even No; & Dated:-

Copy forwarded to:

1. The Commissioner Malakand Division at Saidu Sharif Swat.
2. The Deputy Secretary (LK&B) Ministry of SAFRON Division Islamabad.
3. The PS to Secretary Home & TA's Department Government of Khyber Pakhtunkhwa Peshawar.
4. The District Accounts Officer Dir Upper for information and necessary action.
5. The Officials concerned for compliance.

(Muhammad Usman Mehsud, PAS)  
Commandant Levies Force/  
Deputy Commissioner  
Dir Upper.

*As per lead*  
*Dawran*

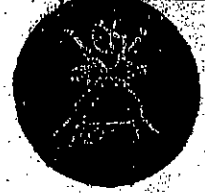
**Syed Dawran Shah**  
Advocate High Court Peshawar  
M.A. J.L.H.



**OFFICE OF THE  
COMMANDANT DIR LEVIES/  
DEPUTY COMMISSIONER**

**DIR UPPER**

No: 7375-80 /DC/LHC  
Dated Dir the: 27/05/2018.

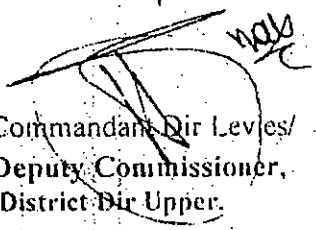


(10)

Annexure B

**CORRIGENDUM/OFFICE ORDER**


In continuation of this office order No. 16059-63/DC/LHC/Office Order/2016 dated 14-11-2016 and as approved by the undersigned in a meeting with Subidar Major Dir Levies, All Subidars, Naib Subidars & Hawldars held on 20-03-2018 at 03:00 PM. the issuance date of the Notification/Office Order referred above in respect officials from S. No 01 to S. No 03 may please be read as 09-11-2016 instead of 14-11-2016.

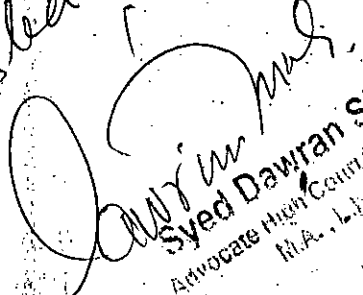
  
Commandant Dir Levies/  
Deputy Commissioner,  
District Dir Upper.

**Even No & date**

Copy forwarded to the:-

1. Commissioner Malakand Division Saidu Sharif Swat.
2. Deputy Secretary (LK&B) Ministry of State & Frontier Region Division Islamabad.
3. The PS to Secretary Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar.
4. The District Account Officer Dir Upper for information and necessary action
5. Subidar Major Dir Levies.
6. Official concerned for compliance.

  
Commandant Dir Levies/  
Deputy Commissioner,  
District Dir Upper.

*Attested*  
  
**Syed Dawran Shah**  
Advocate High Court Peshawar  
M.A., L.L.B.

Annexure "c"

(11)

## نوٹس

ان تمام لیویز اہل کاروں کو مطلع کیا جاتا ہے جن کی پروموشن 14-11-2016

آرڈر نمبر 16059-63/DQ/LHC/Officer Order/2016 کے تحت ہوئی ہے۔

دونائب صوبیداروں مسی گل بادشاہ اور جان زیب نے درخواست کی ہے کہ بوجہ

کی پروموشن مذکورہ آرڈر کو مورخہ 09-11-2016 کو جاری کیا جائے تاکہ ان کو 2021 میں

صوبیدار پوسٹ پر پروموشن مل سکے۔

اگر کسی اہل کار کو مذکورہ آرڈر کے 09-11-2016 پر جاری کرنے میں کسی قسم کی

شکایت ہو تو وہ اپنی شکایت 30 دن کے اندر اندر زیر دستخطی کو جمع کرائے بصورت دیگر مذکورہ آرڈر

کو 09-11-2016 کو جاری کیا جائے گا۔

کمانڈنٹ ڈیر لیویز / ڈپٹی کمشنر

ضلع دیر بالا

S. M.

All SDLOs

Attested

Syed Dawran Shah  
Advocate High Court Faisalabad

خدمتِ بنیاد ڈیٹی گنر صاحب / عارضہٴ دست و پیر سویر / ۱۰/۱۱/۱۵

عنوان  
درخواست شکایتی یا پتہ آرڈر ۱۴/۱۱/۲۰۱۶  
کمان رکھنے کے احکامات

بنیاد بنام

۱۰/۱۱/۱۵  
۱۱/۱۱/۱۵

کے تعلق سے ہے۔ درخواست میں  
ڈیٹی گنر صاحب / عارضہٴ دست و پیر سویر / ۱۰/۱۱/۱۵  
دس رپے ہیں۔ یہ رقم ہر دو وقتوں کے دو گھنٹہ کار پینے سے  
ہے۔ وہ دس اور حقیقت پر مبنی ہے۔ اور ہم اس میں کسی قسم  
کے تعلق نہیں جانتے۔

اور صوبہ داران صلی علیہم السلام اور جائزہ کے درخواست حقیقت کی  
شناختی ہیں۔ اور ہم اس سے متفق نہیں ہیں۔ اور اس سے خارج  
آئندہ کے ہر دو وقتوں کو نقصان پہنچ جائے۔

لکھنا آج صاحب کی خدمت سے عرض کیا جاتا ہے کہ سابقہ  
آرڈر جو کہ ۱۱/۱۱/۱۵ کو سوا ہے۔ اس کو کمان رکھنے کے احکامات  
جائزہ نہیں۔

عین خواہش ہوگی  
اعراضی

بنیاد بنام / عارضہٴ دست و پیر سویر / ۱۰/۱۱/۱۵  
نہایتا / عارضہٴ دست و پیر سویر / ۱۰/۱۱/۱۵

Attested  
Lawyer  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B



خدمت جناب ڈپٹی مشیر صاحب / کمانڈنٹ ڈیڈ بیویہ صلح دید جارا

Annexure E

عنوان: درخواست برائے سٹیٹی Corrigendum / Office Order

(13)

نومبر 27-03-2018 و بحالی مزکورہ آرڈر بموردہ 2016-11-14

LAC

جناب عالی

گزارش حسب ذیل میں

یہ کہ سائلین آپ کے ذریعہ سایہ ڈیڈ بیویہ میں بحیثیت نائب

صوبیداران اپنی فرائض منصبی بطریق احسن سرانجام دے رہے

یہ کہ گزشتہ دنوں میں نائب صوبیداران سٹیٹی جناب عزیز،

فاسٹ سید اور رحمن الدین نے بجا بجا سر فرائض آرڈر نمبر 14-11-2016

کے تاریخ کو برائے آئیڈے آپ جناب کے سامنے درخواست

گمراہی اور آپ صاحبان مزکورہ درخواست کو منظور کرتے

یہ آرڈر مزکورہ کے تاریخ کو 14-11-2016 سے تبدیل کر کے

2016-11-09 کر دیا۔

جناب عالی

مزکورہ آرڈر کے تاریخ کو تبدیل کرنے سے سائلین

کو اپنے ورگے وقت میں سر و صوص میں سٹیڈ سٹیٹ کا سامنا

کرنے پڑے گا اور سائلین اپنے قدر وقت سے اپنے دینا سٹیڈ

یہ نا پڑے گا۔ مزید یہ کہ بجا دایک ساتھی دور دراز میں قدر

مختل ملکوں کا رہنے والا ہے اور اسکو کسی قسم کا نوٹس وغیرہ

میں بھی ملے اور اسکے علم میں لائے بغیر مزکورہ آرڈر کا تاریخ

Attested  
Sayed Dawran Shah  
Advocate High Court Peshawar  
M.A., L.L.B

(124)

مقبول کیا گیا ہے۔ مزید کہ نائب صوبیدار <sup>سماں</sup> نظیر بھی آپ جہاں

کے سامنے پیش کش ہو چکی ہو کہ قرین اصراف میں ہیں۔

مقررہ بار علاقہ دوستی میں آپ کے خدمت میں گزارش

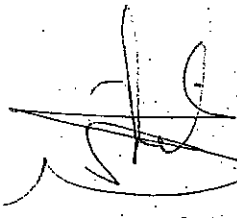
کے لئے ہمارے سر فوٹو میں آرڈر نمبر 16059-63/DC/LHC/0.order

کو اپنے اصلی تاریخ میں 2016-11-14 پر بحال کیا جائے


تاکہ بنائے ان کو کچھ دیکھنے سے۔

عقود آج کے تاریخ فرمان نائب صوبیدار عزت خان <sup>نظیر</sup>

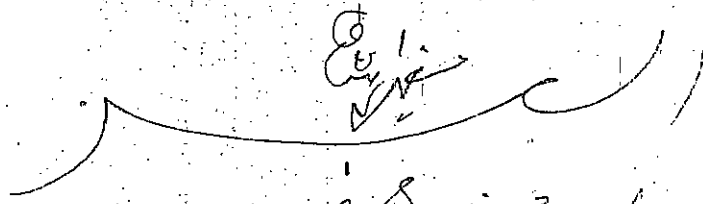
میں دیکھ کر دیکھ کر صلح دیکھنا

 ①

عزت خان نائب صوبیدار

 ①


عزت خان نائب صوبیدار

 ③

عزت خان نائب صوبیدار

28-03-2018

سید

Attested  
  
Syed Dawlat Shah  
Advocate High Court Peshawar  
M.A., LL.B.

Annexure "F"

15

## TENTATIVE SENORITY LIST OF FEDERAL DIR LEVIES DIR UPPER DECEMBER-2017

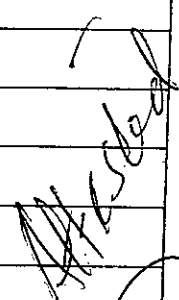
S.NO	NAME	FATHER NAME	BELT NO	DATE OF ENTRY IN TO GOVT SERVICE	DATE OF BIRTH	PRESENT RANK	BASIC PAY SCALE	DATE OF PROMOTION TO THE PRESENT RANK	DATE OF RETIREMENT AS PER RULES	REMARKS
<b>SUBIDAR MAJOR BPS-16</b>										
1	Misbah Ullah	Shafi Ullah	1395	04.10.1987	4/10/1963	S.Major	16	15.05.2015	15.05.2018	
<b>SUBIDAR BPS-13</b>										
1	Nasib Rawan	Feroz Khan	1398	07.01.1988	15/01/1965	Subidar	13	19.11.2013	19.11.2018	
2	Noor Zada	Toor Pacha	1399	11.02.1988	11/2/1970	Subidar	13	19.11.2013	19.11.2018	
3	Shah Yousaf	Bahadar Khan	1414	24.06.1989	24/06/1993	Subidar	13	19.11.2013	19.11.2018	
4	Bakht Zeb	Muhammad Zahid	1449	12.11.1991	12/11/1972	Subidar	13	19.11.2013	19.11.2018	
5	Fateh uddin	Muhammad Rawan	1459	01.03.1992	1/3/1968	Subidar	13	19.11.2013	19.11.2018	
6	Salih Hussian	Jalandar Khan	1461	09.06.1992	9/6/1969	Subidar	13	19.11.2013	19.11.2018	
7	Rafi Uddin	Feroz Khan	1462	09.06.1992	9/6/1969	Subidar	13	19.11.2013	19.11.2018	
8	Hussan Zada	Sada Khan	1466	25.11.1992	25/11/1972	Subidar	13	19.11.2013	19.11.2018	
9	Jehan Zeb	Shah Nawaz	1478	12.09.1993	12/9/1974	Subidar	13	14.11.2016	14.11.2021	✓
10	Khaista Said	Swal Faqir	1480	14.09.1993	14/09/1968	Subidar	13	14.11.2016	14.11.2021	
11	Rahman Uddin	Shah Zada	1483	16.03.1994	16/03/1974	Subidar	13	14.11.2016	14.11.2021	

Syed Rawan  
 Subordinate High Court Peshawar  
 H.A. LLB

16

## NAIB SUBIDAR BPS-11

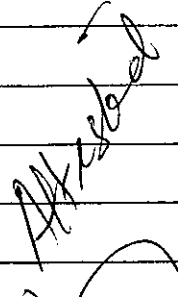
1	Muhammad Nazib	Anwar Zeb	1490	02.10.1994	2/10/1975	N.Subidar	11	11.11.2014	11.11.2021	
2	Noor Islam	Mubarak Said	1493	01.12.1994	1/12/1974	N.Subidar	11	11.11.2014	11.11.2021	
3	Munasib Khan	Nawsher Khan	1495	06.12.1994	6/12/1972	N.Subidar	11	11.11.2014	11.11.2021	
4	Faiz ul Hakim	Bashir	1497	01.01.1995	1/1/1970	N.Subidar	11	11.11.2014	11.11.2021	
5	Muhammad Israr	Naqshay	1499	01.01.1995	1/1/1973	N.Subidar	11	11.11.2014	11.11.2021	
6	Ihsan Ullah	Shah Muhammad	1500	18.01.1995	18/01/1976	N.Subidar	11	11.11.2014	11.11.2021	
7	Ghauso Rahman	Muhammad Amin	1505	11.08.1996	19/01/1971	N.Subidar	11	11.11.2014	11.11.2021	
8	Abdur Rashid	Faiz Muhammad	1508	11.08.1996	11/10/1974	N.Subidar	11	11.11.2014	11.11.2021	
9	Raza Ullah	Amir Muhammad	1509	11.08.1996	13/01/1975	N.Subidar	11	11.11.2014	11.11.2021	
✓ 10	Gul Badshah	Khaist Muhammad	1515	11.08.1996	10/12/1972	N.Subidar	11	11.11.2014	11.11.2021	
✓ 11	Jehan Zeb	Bacha Sardar	1516	11.08.1996	3/12/1972	N.Subidar	11	11.11.2014	11.11.2021	
12	Muhammad Iqbal	Bakht Zamin	1518	11.08.1996	3/1/1979	N.Subidar	11	11.11.2014	11.11.2021	
13	Nasib Zada	Muhammad Jan	1522	11.08.1996	1/1/1970	N.Subidar	11	11.11.2014	11.11.2021	
14	Rahmat Rehman	Fazal Rahman	1523	11.08.1996	25/05/1974	N.Subidar	11	11.11.2014	11.11.2021	
15	Muhammad Jawad Khar	Muhammad Nawshad	1524	13.08.1996	24/06/1975	N.Subidar	11	11.11.2014	11.11.2021	
16	Javed Iqbal	Muhammad Islam	1528	25.08.1996	4/3/1977	N.Subidar	11	11.11.2014	11.11.2021	
17	Fazal Raziq	Hakim Jan	1533	16.10.1996	16/10/1973	N.Subidar	11	11.11.2014	11.11.2021	
18 ✓	Izat Khan	Sadat Khan	1537	22.10.1996	22/10/1976	N.Subidar	11	14.11.2016	14.11.2023	
19 ✓	Mazhar Shah	Ali Haider	1539	22.10.1996	22/10/1974	N.Subidar	11	14.11.2016	14.11.2023	
20 ✓	Muhib Ullah	Jamroz Khan	1540	25.10.1996	01.07.1967	N.Subidar	11	14.11.2016	14.11.2023	

  
 Syed Dawlat Shah  
 Advocate High Court Peshawar  
 M.A., L.L.B.

(17)

## HAWALDAR BPS-08

1	Gulab Zada	Badshah Mula	1559	16.04.1998	16.04.1976	Hawalдар	08	19.11.2013	-	
2	Allauddin	Jan Bakht Khan	1560	18.04.1998	18.04.1977	Hawalдар	08	19.11.2013	-	
3	Gul Akbar Khan	Rahim Khan	1561	18.04.1998	18.04.1970	Hawalдар	08	19.11.2013	-	
4	Khaista Zada	Kamin Khan	1562	21.04.1998	21.04.1973	Hawalдар	08	19.11.2013	-	
5	Sahib Zada	Gul Ta Khan	1566	01.06.1998	01.06.1974	Hawalдар	08	19.11.2013	-	
6	Gul Ihsan Ullah	Jehan Zeb	1568	01.06.1998	01.06.1970	Hawalдар	08	19.11.2013	-	
7	Sher Nawaz Khan	Shah Nas Khan	1570	01.06.1998	01.06.1974	Hawalдар	08	19.11.2013	-	
8	Muhammad Tamin Khan	Jan Muhammad	1572	01.06.1998	01.06.1976	Hawalдар	08	19.11.2013	-	
9	Amir Badshah	Ghausul Alam	1577	11.06.1998	11.06.1979	Hawalдар	08	19.11.2013	-	
10	Badshah Uddin	Shahab Uddin	1588	01.03.1999	03.04.1975	Hawalдар	08	19.11.2013	-	
11	Shah Muhammad	Yar Muhammad Khan	1589	01.03.1999	03.12.1973	Hawalдар	08	19.11.2013	-	
12	Zahoor Uddin	Muhammad Zahir Khan	1600	17.08.1999	17.08.1980	Hawalдар	08	11.11.2014	-	
13	Amir Zeb Khan	Shah Nawaz Khan	1604	14.09.1999	01.06.1980	Hawalдар	08	11.11.2014	-	
14	Muhammad Tahir	Abdul Hamid	1606	20.09.1999	25.03.1973	Hawalдар	08	11.11.2014	-	
15	Ayub Khan	Rasool Shah	1619	08.05.2000	01.07.1976	Hawalдар	08	11.11.2014	-	
16	Hayat Ullah	Rahim Ullah	1632	16.11.2000	01.06.1977	Hawalдар	08	11.11.2014	-	
17	Bidar Khan	Toor Bacha	1716	01.12.1999	18.03.1976	Hawalдар	08	11.11.2014	-	
18	Jehan Zeb	Faqir Khan	1618	05.05.2000	05.06.1975	Hawalдар	08	11.11.2014	-	
19	Rafi Ullah Khan	Qarib Ullah	1638	09.01.2001	01.01.1973	Hawalдар	08	11.11.2014	-	
20	Jan Feroz	Muhammad Roz Khan	1642	14.02.2001	01.07.1981	Hawalдар	08	11.11.2014	-	

  
 Syed Rawshan Shah  
 Advocate High Court Peshawar  
 M.A., L.L.B.

OFFICE OF THE DEPUTY COMMISSIONER, LOWER DIR TIMERGARA.

No. \_\_\_\_\_ /A/10(LHC), dated Timergara, the 8/10 /1996.

OFFICE ORDER

The following persons are hereby appointed as Sepoys in Dir Levies against the vacant posts in the time pay scale No.I (1245-35-1770) plus usual allowances as admissible under the rules subject to the production of Health and Age Certificate from the Civil Surgeon Dir at Timergara :-

1. Mr.Izat Khan s/o Sadat Khan of Village Kalkot, Tehsil Kalkot.
2. Mr.Mohibullah s/o Jamroz of village Dodba, Tehsil Dir.
3. Mr.Fazli Raziq s/o Hakim Jan of village Hayagai, Tehsil Dir.
4. Mr.Monhar Shah s/o Fazli Haider of village and Tehsil Barawal.
5. Mr.Daulat Khan s/o Umar Gul of village Khungi, Tehsil Timergara.
6. Mr.Khurshid s/o Mohmandai of Village Makhai, Tehsil Munda.
7. Mr.Namir Hamid s/o Hazrat Alim of village Chakdar, Tehsil Adinzai.
8. Mr.Nasibur Rehman s/o Abdul Wahid of village Teknai, Tehsil Adinzai.
9. Mr.Mohammad Zubair s/o Abdul Ghani of village Haji Abad, Tehsil Balaubat.

Deputy Commissioner  
Lower Dir Timergara

No. 1517-261

Copy forwarded to the :-

1. District Accounts Officer, Dir at Timergara.
2. Subedar Major, Dir Levies.
3. Officials concerned.

For information and necessary action.

*Attested*

*Syed Dawran Shah*  
Syed Dawran Shah  
Advocate High Court, Peshawar  
M.A., L.L.B

*M. Muhammad*  
Deputy Commissioner  
Lower Dir Timergara

OFFICE OF THE DEPUTY COMMISSIONER, DIR.No. /A/10(AO), Dated Timergara the, 5<sup>th</sup> /8/1936.ORDER.

The following persons are hereby appointed as Sepoys in Dir Levies against the vacant posts in the time Pay Scale No. 1 (1245-35-1770) plus usual allowances as admissible under the rules subject to the production of Health and Age Certificate from the Civil Surgeon Dir at Timergara :-

1. Mr. Farid Khan s/o Khista Khan of village Paito Tehsil Timergara District Dir.
2. Mr. Abdul Karim s/o Inzar Gul of village Khanpur Tehsil Adenzai District Dir.
3. Mr. Noor Zaman s/o Sher Zaman of village Khanpur Tehsil Adenzai District Dir.
4. Mr. Farmanullah s/o Gulab Shah of village Paito (Markhano) Tehsil Timergara District Dir.
5. Mr. Khaider Zaman s/o Gul Shehzada of village Chakdara Tehsil Adenzai District Dir.
6. Mr. Badshah Rehman s/o Behramand of village Khanpur Tehsil Adenzai District Dir.
7. Mr. Jehan Zeb s/o Mohammad Jabbar of village Manogai Tehsil Adenzai District Dir.
8. Mr. Ghani Rehman s/o Dost Mohammad of village Rahim Abad Tehsil Munda District Dir.
9. Mr. Shah Zaman Khan s/o Afridi Khan of village Gusam Tehsil Munda District Dir.
10. Mr. Iqbal Hussain s/o Ajeebul Hassan of village Gusam Tehsil Munda District Dir.
11. Mr. Abdul Mabood s/o Abdur Rouf of village Kambat Tehsil Munda District Dir.
12. Mr. Rehmat Rehman s/o Fazal Rehman of village Akhagram Tehsil Wari District Dir.
13. Mr. Gul Badshah s/o Khista Mohammad of village Wari Tehsil Wari District Dir.
14. Mohammad Iqbal s/o Bakht Zamin of village Battan (Wari) Tehsil Wari District Dir.
15. Mr. Rehmatullah s/o Dawa Khan of village Toormang Tehsil Khall District Dir.
16. Mr. Abdur Rashid s/o Faiz Mohammad of village Panakot Tehsil Dir District Dir.
17. Razaullah s/o Amir Mohammad of village Panakot Tehsil and District Dir.
18. Mr. Nasib Zada s/o Mohammad Jan of village Palam Tehsil and District Dir.
19. Mr. Shakirullah s/o Mohammad Ali Khan of village Tikni Tehsil Adenzai District Dir.

Attested

*Syed Dawran Shah*  
 Syed Dawran Shah  
 Advocate High Court Peshawar  
 M.A., L.L.B.

(P....2)

20. Mr. Shah Faizal s/o Abdul Kalam of village Kassu Tehsil Timrgara District Dir.
21. Mr. Jehan Zeb s/o Bacha Sardar of village Jughabanj Tehsil Wari District Dir.
22. Mr. Ghausur Rehman s/o Mohammad Amin of village Chukiatan Tehsil and District Dir.
23. Mr. Said Alam s/o Sier Afzal of village Badwan Tehsil Adenzai District Dir.

DEPUTY COMMISSIONER, DIR.

1408

No. 1384-~~2378~~, A/1 (LHC),

Copy forwarded to the :-

1. District accounts Officer, Dir at Timrgara.
2. Subedar Major Dir Levies.
3. Officials concerned.

For information and necessary action.

*M. Amin ul*  
DEPUTY COMMISSIONER, DIR.

*as by*

*Attended*  
*Q*  
*M. Amin ul*  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., LL.B



21

Please refer to application submitted by M/S Gul Badshah & Jehan Zeb Naib Subedars of Dir PATA Federal Levies.

In this connection, it is stated that two DPCs for promotion of Levy Force Personnel were arranged on 07-11-2014 & 04-11-2016. The personnel promoted to the post of Subedars were included in the DPC arranged on 07-11-2014 for their promotion to the rank of Naib Subedar. In the said DPC, the applicants were also included & promoted to the rank of Naib Subedars. The personnel recommended for promotion to the rank of Subedars in the DPC held on 04-11-2016 but their Notification was issued on 14-11-2016, therefore they will be due for retirement on 14-11-2021 after rendering 05 years service as Subedar & as such their posts will be vacated, against which the applicants as per seniority list will be due for promotion but that time 03 days before, the applicants would have been retired after rendering 07 years service as Naib Subedar. Feeling this, the applicants have requested to review the date of Notification of promotion of Subedars recommended by the DPC on 04-11-2016 to give them further chance of promotion.

In the light of above to redress grievances of the applicants, if agreed the date of Notification of Subedars recommended for promotion on 04-11-2016 will be revised and the following corrigendum will be issued:

Corrigendum

"As approved by DPC on 04-11-2016 please read date of Notification/Office Order issued vide this officer order No.16059-63/DC/LHC/Office Order/2016 dated 14-11-2016 as 09-11-2016 instead of 14-11-2016".

Submitted for orders please.

DC/Commandant

Affected

Gul Badshah  
Advocate High Court Peshawar  
B.A., LL.B

LHC

Jehan Zeb Naib

Jehan Zeb Naib

LHC

تعمیرات کے لیے 15.15 بجے تک ناٹیکس  
Tehzeeb

## Better Copy

Please refer to application submitted by M/S Gul Badshah and Jehan Zeb Naib Subedars of Dir Pata Federal Levies.

In this connection, it is stated that two DPCs for the promotion of Levy Force Personnel were arranged on 07-11-2014 & 04-11-2016. The Personnel promoted to the post of subedars were included in the DPC arranged on 07-11-2014 for their promotion on the rank of Naib Subedars in the said DPC, the applicants were also included & promoted to the rank of Naib Subedars. The personnel's recommended for promotion on the rank of Subedars in the DPC held on 04-11-2016 but there notification was issued on 14-11-2016 therefor they will be due for retirement on 14-11-2021 after rendering 5 years of service as Subedars & as such their posts will be vacated, against which the applicants as per seniority list will be due for promotion but that time 3 days before, the applicants would have been retired after rendering 7 years of Naib Subedars. Feeling this, the applicants have requested to review the date of notification of promotion of Subedars recommended by the DPC on 04-11-2016 to give them further chance of promotion.

In the light of above to redress grievance of the applicants, if agreed the date of Notification of Subedars recommended for promotion on 04-11-2016 will be revised and the following corrigendum will be issued:-

### Corrigendum

"As approved by DPC on 04-11-2016 please read date of notification/Office Order issued vide this Officer Order No. 16059-63/DC/LHC/Office Order/2016 dated 14-11-2016 as 09-11-2016 instead of 14-11-2016".

Submitted for Orders Please.

DC/Commandant

Att-2/2016  
O  
Syed Dawran Shah  
Advocate High Court Peshawar  
M.A., J.L.S.

قیمت 50 روپے	<i>Lawran Shah</i>	ایڈوکیٹ: <u>سید دوران شاہ ایڈووکیٹ</u> بار کونسل ایسوسی ایشن نمبر: <u>BC-10-7799</u> رابطہ نمبر: <u>03005985384</u>	 	41923
			پشاور بار ایسوسی ایشن، خیبر پختونخواہ	

بعدالت جناب: سر جسٹس بیونل خیبر پختونخواہ ہائیکورٹ

مخانب: <u>ایڈوائس</u>	دعویٰ: <u>اسٹیل</u>
عبارت نمبر: <u>محبت اللہ</u>	موضوع: _____
بنام <u>حکومت پاکستان</u>	جرم: _____
	تھانہ: _____

**باعت تحریر آتکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام لسٹڈ کیلئے سید دوران شاہ ایڈووکیٹ کو وکیل مقرر کیا گیا ہے۔  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے  
 المرقوم:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

*Accepted by*  
Lawran Shah  
 Syed Dawran Shah  
 Advocate High Court Peshawar  
 M.A., L.L.B.

*[Signature]*

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

Muhib Ullah s/o Jamroz Khan .....APPLICANT.

V/S

Commandant Dir Levies/Deputy Commissioner Dir Upper & others  
.....RESPONDENTS.

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03	Application of respondent 2 & 3	"A"	4
04	Notice	"B"	5
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06	Corrigendum/Office Order	"D"	8

Razaullah

  
Levy Head Clerk

DC/Commandant Office Dir Upper

①

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

Service appeal No. 25 of 2019

Muhib Ullah s/o Jamroz Khan Naib Subidar Dir Levies District Dir Upper..... (Appellant)

**Versus**

- 1) The Commandant Dir Levies/Deputy Commissioner Dir Upper.
- 2) Gul Bacha s/o Khaista Muhammad (Naib Subidar) Dir Levies District Dir Upper.
- 3) Jehan Zeb s/o Bacha Sardar (Naib Subidar) Dir Levies District Dir Upper.

.....(Respondents)

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1973 AGAINST THE OFFICE ORDER/CORRIGENDUM NO. 3775-80/DC/LHC DATED 27-03-2018 ISSUED BY THE DEPUTY COMMISSIONER/COMMANDANT DIR LEVIES DISTRICT DIR UPPER WHEREBY OFFICE ORDER NO. 16059-63/DC/LHC/OFFICE ORDER/2016 DATED 14-11-2016 WAS ORDERED TO BE READ AS 0-011-2016 INSTEAD OF 14-11-2016 FROM S. NO. 01 TO S. NO. 03 I.E IN RESPECT OF RESPONDENT NO 02 AND 03.**

**PARAWISE COMMENTS ARE AS UNDER:-**

**PRELIMINARY OBJECTIONS:-**

- 1) That the appellant has no cause of action or locus standi.
- 2) That the appellant has been estopped by his own conduct to file the appeal.
- 3) That the appeal is not maintainable under Section-4 of the service Tribunal Act-1974.
- 4) That this Honorable Tribunal has no jurisdiction to entertain the appeal.
- 5) That the appellant has not come to the Tribunal with clean hand.

**RESPECTFULLY SHEWETH**

- 1) Para No. 1 is correct to the extent of posting.
- 2) Correct.
- 3) Correct to the extent that the respondent No. 02 and 03 submitted an application to the respondent No. 01/undersigned taking the plea that their DPC was held on 07-11-2016 and due to clerical mistake the office order/notification was issued on 11-11-2016 while the DPC of their fellow subidars was held on 04-11-2016 and due to the same clerical mistake the office order/notification was issued on 14-11-2016 (03 days after them) due to which they seems danger to their further promotion and requested that in order to redress their grievances the date of the same order may please be read as 09-11-2016 instead of 14-11-2016.

Consequently this office issued notice in the name of all those officials who have been promoted vide order No. 16059-63/DC/LHC/Office Order/2016 dated 14-11-2016, with the directions if anyone have any sort of objection regarding change in the issuance date of the said office order/notification he must have to file it in this office within thirty days after the issuance of the said notice. No written objection was received from the present

3

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR

Muhib Ullah s/o Jamroz Khan .....APPLICANT.

V/S

Commandant Dir Levies/Deputy Commissioner Dir Upper & others  
.....RESPONDENTS

AFFIDAVIT

I, Razaullah Levy Head Clerk office of the Commandant Dir Levies/ Deputy  
Commissioner Dir Upper, do hereby solemnly affirm and declare on oath that  
the contents of the accompanying Para wise Comments on behalf of Respondents  
No. 1 are true and correct to the best of my knowledge and behalf that nothing  
has been concealed from this Hon'ble Court.

Deponent 

CNIC No: 15702-2500720-3

Identified by

خدمت کے حوالے سے ڈپٹی کمشنر صاحبہ کی درخواست کے جواب دینے کے لیے  
ممنوعہ درخواست نمبر ۱۱۱/۱۶/۲۰۱۶ کے تحت جواب دینے کے لیے  
۱۶/۱۱/۲۰۱۶

جواب عالی  
سائیکل انجیل ڈیل ٹریڈنگ کمپنی سے

۱۱/۱۱/۲۰۱۴  
ڈپٹی کمشنر صاحبہ کی درخواست نمبر ۱۱۱/۱۶/۲۰۱۶ کے تحت جواب دینے کے لیے  
ممنوعہ درخواست نمبر ۱۱۱/۱۶/۲۰۱۶ کے تحت جواب دینے کے لیے

۱۱/۱۱/۲۰۱۴ اور نوٹیفکیشن ۱۱/۱۱/۲۰۱۴  
۱۱/۱۱/۲۰۱۴ اور نوٹیفکیشن ۱۱/۱۱/۲۰۱۴  
۱۱/۱۱/۲۰۱۴ اور نوٹیفکیشن ۱۱/۱۱/۲۰۱۴

(۳) یہ کہ سرورس رول کے مطابق نائیب سے مددگار مادہ وراثت سے  
سال سے اور مددگار کی ملازمت سے مادہ وراثت سے باخبر ہے  
۱۴۸۳  
۱۴۸۳  
(۴) یہ کہ خواستہ سید اور رحمان الدین مددگار کی DF سے سائیکل  
سے تین دن قبل ہونے سے اور نوٹیفکیشن سائیکل سے  
تین دن بعد ہونے سے جو کہ سائیکل کی حق تلفی ہونے سے  
اور آیت علیہ السلام سے (بقولت لف فدا ہے)

(۵) یہ کہ مذکورہ علیہ السلام سے دوبارہ نظر ثانی کرنا ضروری اور قرین  
انصاف ہے اور نظر ثانی نہ ہونے سے مددگار سے سائیکل  
کے پروموشن پر برے اثرات مرتب ہونے کا قوی امکان ہے  
حالات سے بالواسطہ ہے کہ سائیکل کے طالب پیرم  
نفاذ مذکورہ علیہ السلام اور حکم نمبر ۱۱/۱۱/۲۰۱۶  
کی طرف سے اقدامات ہمارے مفاد میں

الدریغہ  
فقط مدد

Handwritten signature

سائیکل انجیل ڈیل ٹریڈنگ کمپنی  
جہان ریٹ بیٹ ۱۵۱۶ واڑی سب ڈویژن دیر لاک

## نوٹس

ان تمام لیویز اہل کاروں کو مطلع کیا جاتا ہے جن کی پروموشن 14-11-2016 کو

آرڈر نمبر 16059-63/DC/LHC/Officer Order/2016 کے تحت ہوئی ہے۔

دونائب صوبیداروں مسی گل بادشاہ اور جان زیب نے درخواست کی ہے کہ بوجہ ان

کی پروموشن مذکورہ آرڈر کو مورخہ 09-11-2016 کو جاری کیا جائے تاکہ ان کو 2021 میں

صوبیدار پوسٹ پر پروموشن مل سکے۔

اگر کسی اہل کار کو مذکورہ آرڈر کے 09-11-2016 پر جاری کرنے میں کسی قسم کی

شکایت ہو تو وہ اپنی شکایت 30 دن کے اندر اندر زیر دستخطی کو جمع کرائے بصورت دیگر مذکورہ آرڈر

کو 09-11-2016 کو جاری کیا جائے گا۔

کمانڈنٹ ڈیپری لیویز / ڈپٹی کمشنر  
ضلع دیر بالا

S. M

All SDLOs



6) محترمہ عیان ڈیپٹی سسر / مکائنٹ ڈیپٹی سسر / صلیح ڈیپٹی سسر

معاون: درخواست برائے سٹوڈنٹ / Office Order / Convergence

نومبر 2018-03-27 و محالی بزکوردہ آرڈر نمبر 14-11-2016

عیان عالی

Handwritten signature/initials

گزارش حسب ذیل میں

یہ کہ مسائل آپ کے ذمہ سپاہیہ ڈیپٹی سسر میں بحیثیت نائب

صوبہ سیدان ایسی فرائض منصبی بطریق احسن سرانجام دے رہے

یہ کہ گزشتہ دنوں میں نائب صوبہ سیدان سنی جہا نزیب،

فرائض سید اور رحمن الدین نے ہمارے سرکوش آرڈر نمبر 14-11-2016

گزارش اور آپ سے ہمارے سید آپ عیان کے سامنے درخواست

گزارش اور آپ سے ہمارے سید آپ عیان کے سامنے درخواست کو منظور کرتے

ہوئے آرڈر نمبر 14-11-2016 سے تبدیل کرنے

2016-11-09 کر دیا۔

عیان عالی

مذکورہ آرڈر کے تاریخ کو تبدیل کرنے سے مسائل

کو اپنے وقت میں سرکوش میں سید یہ شکلیت کا سامنا

کرتا کرتے گا اور مسائل اپنے بقدر وقت سے اپنے رہنما سٹوڈنٹ

یوں نا پڑے گا۔ مزید یہ کہ ہمارے سابق دور دراز عملی

حقیقی مکتوبات کا اپنے ہوا ہے اور اسکو کسی قسم کا نوٹس وغیرہ

میں عملی ہے اور اس کے علم میں رائے بعینہ مذکورہ آرڈر کے تاریخ

تبدیل کیا گیا ہے۔ مزید کہ نائب صوبیدار نظیر علی آہ جہاں شاہ  
سائے پیش میں یہ واقعہ جو کہ قرین الصفا میں ہیں۔

مقرر علی بارہ حقان کی دوستی میں آپ کے خدمت میں گزارش  
ہے کہ چھارے سر و سوسن آرڈر نمبر 16059-63/DC/LHC/0.order

کو اپنے اصلی تاریخ میں 2016-11-14 پر بحال کیا جائے۔  
تا کہ مسائل ان کو کچھ دیکھنے سے۔

مقرر آہ کے تابع سر جان نائب صوبیدار عزت خان نظیر شاہ  
محمد اللہ دیر پورین صلح دیر بارہ

عزت خان نائب صوبیدار

محمد اللہ نائب صوبیدار

عزت خان نائب صوبیدار

محمد اللہ نائب صوبیدار

نظیر شاہ

نظیر شاہ نائب صوبیدار

28-03-2013



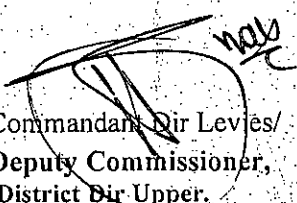
(8) Annex "D"

**OFFICE OF THE  
COMMANDANT DIR LEVIES/  
DEPUTY COMMISSIONER  
DIR UPPER**

No: 7375-80 /DC/LHC  
Dated Dir the: 27 /03/2018.

**CORRIGENDUM/OFFICE ORDER**

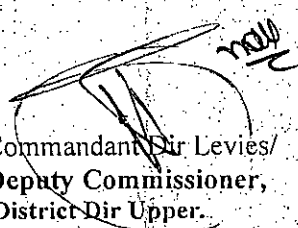
In continuation of this office order No. 16059-63/DC/LHC/Office Order/2016 dated 14-11-2016 and as approved by the undersigned in a meeting with Subidar Major Dir Levies, All Subidars, Naib Subidars & Hawldars held on 20-03-2018 at 03:00 PM, the issuance date of the Notification/Office Order referred above in respect officials from S. No 01 to S. No 03 may please be read as 09-11-2016 instead of 14-11-2016.

  
Commandant Dir Levies/  
Deputy Commissioner,  
District Dir Upper.

**Even No & date**

Copy forwarded to the:-

1. Commissioner Malakand Division Saidu Sharif Swat.
2. Deputy Secretary (LK&B) Ministry of State & Frontier Region Division Islamabad.
3. The PS to Secretary Home & Tribal Affairs Deptment Khyber Pakhtunkhwa Peshawar.
4. The District Account Officer Dir Upper for information and necessary action
5. Subidar Major Dir Levies.
6. Official concerned for compliance.

  
Commandant Dir Levies/  
Deputy Commissioner,  
District Dir Upper.

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

**Appeal No. 25/2019**

**MUHIB ULLAH**

**VS**

**DEPUTY COMMISSIONER  
& OTHERS**

**REPLY ON BEHALF OF PRIVATE RESPONDENT NO. 2  
& 3 (Mr. GUL BADSHAH & JEHAZEB)**

**R/SHEWETH:**

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appellant has not come to this Honorable Tribunal with clean hands.
3. That the appellant is estopped by his own conduct to file the instant appeal.
4. That the instant appeal is not maintainable in its present form.
5. That the appeal is bad due to Non-Joinder & Mis-Joinder of necessary parties.
6. That the appeal of the appellant is time barred.
7. That the appellant has concealed materials facts from this Honorable Tribunal.

**ON FACTS:**

1. Pertains to the appellant's own service record, hence needs no reply.
2. Admitted correct to the extent that the replying respondents No.2 & 3 submitted an application before the Commandant Dir Levies/Deputy Commissioner District Dir upper while the rest of Para is incorrect. That the replying respondents submitted application before the respondent No.1 for correction of date in the promotion order dated 14.11.2016 in respect of official at S.No.1 to S.No.3 may be read as 09.11.2016 instead of 14.11.2016. That the said officials were promoted to the Rank of Subedar who's DPC was held on 04.11.2016 and due to the said clerical mistake the

replying respondents seems to danger for their further promotion in future. (Copy of the record is attached as annexure.....R).

3. Admitted correct to the extent of submitting application while the rest of Para is incorrect. That the concerned authority accepted the application submitted by the replying respondents No.2 & 3 and issued a notice to all concerned with the directions if any sort of objection regarding change in the issuance date of the said office order/Notification he must have to file it in this office within thirty days after issuance of the said notice.
4. Pertains to official record hence needs no comments.
5. Admitted correct to the extent of acceptance of application of the replying respondents No.2 & 3 and issued corrigendum on 27.03.2018 by ordering that the date of Notification dated 14.11.2016 be read as 09.11.2016 instead of 14.11.2016. Furthermore, that the replying respondents No.2 & 3 are the senior most employees of the concerned Department and placed at serial No. 2 & 3 of the seniority list and due to the incorrect date of the Notification i.e. 14.11.2016 affects the legal rights of all other officials which were rightly corrected by the authorities.
6. Pertains to official record hence needs no comments.
7. No comments.

**GROUND:**

- A- Incorrect and misconceived. The act of the authority by issuing corrigendum regarding correction in the date of Notification is in accordance with law and rules, hence no violation have been in respect of Article-4 of the Constitution of Islamic Republic of Pakistan.
- B- All other grounds of main appeal are incorrect, baseless and not in accordance with law and rules hence not tenable in the eye of law.

It is therefore, most humbly prayed that on acceptance of this reply the appeal of the appellant may kindly be dismissed with cost.

**PRIVATE RESPONDENT NO. 2 & 3**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

~~A~~ R - (4)

OFFICE OF THE  
COMMANDANT/DEPUTY COMMISSIONER  
UPPER DIR.

No: 14070-7/DC/LHC/Upper Dir.  
Dated Dir the: 7/1/14/2014.

The Secretary  
Home & T.A.s Department  
Govt. of Khyber Pakhtun Khwa.

The Commissioner,  
Malkand Division at Sadu Sharif Swat.

Subject: MINUTES OF THE MEETING.

Please find herewith enclosed minutes of the meeting of Departmental Promotion  
Committee of Federal & Provincial levies held under the chairman ship of the undersigned is sent  
herewith as desired please.

Enclosures: 5

M. *[Signature]* 7/1/14  
Commandant Dir Levies /  
DEPUTY COMMISSIONER DIR UPPER  
#

5

Subject: MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE.

A meeting of the Departmental Promotion Committee was held on 07-11-2014 in the office of Deputy Commissioner /Commandant Dir Levies Dir Upper to consider the promotion of Federal Levies personnel to rank of Naib Subidar and Hawaldar.

The following attended the meeting:-

- |  |          |
|--|----------|
| 4. Deputy Commissioner Upper Dir         | In chair |
| 5. Representative of Home Department     | Member   |
| 6. Representative of Commissioner office | Member   |

The committee after scrutiny of the record i.e. Seniority list and Physical fitness etc recommended the following Hawaldars and Naiks of the Federal Levies to the rank of Naib Subidars and Hawaldars against the existing vacancies.

CaseNo 1: PROMOTION OF HAWALDAR TO THE RANK OF NAIB SUBIDAR

S#	NAME OF OFFICER	PRESENT RANK	NEXT RANK
1	Jehan Zeb	Hawaldar	Naib Subidar
2	Khaista Said	-do-	-do-
3	Rehmanuddin	-do-	-do-
4	Muhammad Nazif	-do-	-do-
5	Noor Islam	-do-	-do-
6	Muansab Khan	-do-	-do-
7	Faizul Hakim	-do-	-do-
8	Muhammad Israr	-do-	-do-
9	Ihsanullah	-do-	-do-
10	Ghus Rehman	-do-	-do-
11	Abdur Rasheed	-do-	-do-
12	Raza Ullah	-do-	-do-



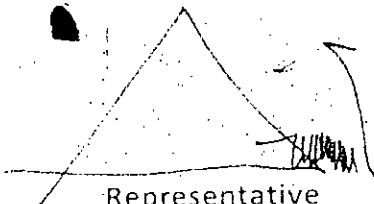
6

13	Gul Basdshah	-do-	-do-
14	Jehan Zaib s/o Bacha Sardar	-do-	-do-
15	Muhammad Iqbal	-do-	-do-
16	Nasib Zada	-do-	-do-
17	Rehmar Rehman	-do-	-do-
18	Muhammad Jawad Khan	-do-	-do-
19	Javeed Iqbal	-do-	-do-
20	Fazal Raziq	-do-	-do-

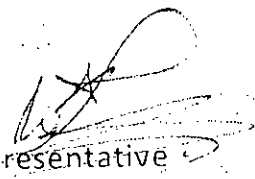
Case NO 2: PROMOTION OF NAIK TO THE RANK OF HAWALDAR.

Sl#	NAME OF OFFICAIL	PRESENT RANK	NEXT RANK
1	Zahoor-Uddin	Naik	Hawaldar
2	Amir Zaib	-do-	-do-
3		-do-	-do-
4	Muhammad Tahir	-do-	-do-
5	Bidar Khan	-do-	-do-
6	Jehan Zaib s/o Faqeer Khan	-do-	-do-
7	Ayub Khan	-do-	-do-
8	Hayat Ullah	-do-	-do-
9	Rafi Ullah Khan	-do-	-do-
10	Ian Feroz	-do-	-do-
11	Hazrat Sultan	-do-	-do-
	Hazrat Muhammad	-do-	-do-

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Representative  
Home & TAs Department  
(Member)



Representative  
Commissioner Office Malakand Division  
(Member)

DEPUTY COMMISSIONER DIR UPPER  
(Chairman)

Subject:

MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE.

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A meeting of the Departmental promotions committee was held on 04.11.2016 in the office of the Deputy Commissioner /Commandant Dir Levies Upper Dir to consider promotion of the Federal Levies personnel to the rank of Subidar, N.Subidar, Naik and Lance Naik.

The following attended the meeting:-

1. Deputy Commissioner Upper Dir. In chair
2. Representative of Home & TA's Department Member
3. Representative of Commissioner office Member

The committee after scrutiny of the record i.e. Seniority list and Physical fitness etc recommended the following N.Subidar to Subidar, Hawaldar to N.Subidar, Naik and Lance Naik. of the Federal Levies against the existing vacancies.

CASE NO 1: PROMOTION OF NAIB SUBIDAR TO THE RANK OF SUBIDAR.

S.#	Name	Father Name	DOB	DOA	Present Post	Post to be promoted
1	Jehan Zeb	Shah Nawaz	12-09-1974	12-09-1993	N.Subidar	Subidar
2	Khaista Said	Swal Faqir	14-09-1968	14-09-1993	N.Subidar	Subidar
3	Rehman Uddin	Shah Zada	16-03-1974	16-03-1994	N.Subidar	Subidar

CASE No 2: PROMOTION OF HAWALDAR TO THE RANK OF N.SUBIDAR

S.#	Name	Father Name	DOB	DOA	Present Post	Post to be promoted
1	Izzat Khan	Sadat Khan	22-10-1976	22-10-1996	Hawaldar	N.Subidar
2	Mazhar Shah	Ali Haider	22-10-1974	22-10-1996	Hawaldar	N.Subidar
3	Muhaib Ullah	Jamroz Khan	01-07-1967	25-10-1996	Hawaldar	N.Subidar

CASE No 3: PROMOTION OF L.NAIKS TO THE RANK OF NAIKS.

S.#	Name	Father Name	DOB	DOA	Present Post	Post to be promoted
1	Nasib Zada	Khan Zada	02.07.1991	01.02.2010	L.Naik	Naik
2	Naeem Ullah	Fazal Wahid	04.03.1991	01.02.2010	L.Naik	Naik
3	Jamal Shah	Shah Zamin	28.06.1988	01.02.2010	L.Naik	Naik

	Saeed ur Rahaman	Muhammad Yar	02.04.1989	01.02.2010	L.Naik	Naik
5	Shoukat Ali	Rahman Gul	21.06.1986	01.02.2010	L.Naik	Naik
6	Sajid Ullah	Muhammad Irshad	01.01.1987	01.02.2010	L.Naik	Naik
7	Rafi Ullah	Nadar Saeed	02.01.1988	01.02.2010	L.Naik	Naik
8	Bakht Rawan	Amir Rahman	03.07.1979	01.02.2010	L.Naik	Naik
9	Naved Khan	Khalid Khan	09.04.1990	01.02.2010	L.Naik	Naik
10	Amin Ullah	Ranja Khan	18.08.1989	01.02.2010	L.Naik	Naik
11	Gul Hasan	Rasool Khan	20.08.1990	01.02.2010	L.Naik	Naik
12	Gul Sahib Zada	Muhammad Arif	01.04.1987	01.02.2010	L.Naik	Naik
13	Afzal Khan	Bazir Khan	05.03.1987	01.02.2010	L.Naik	Naik
14	Ikram ul Haq	Amin ul Haq	02.04.1991	01.02.2010	L.Naik	Naik
15	Muhammad Baz	Saeed Azim	10.04.1991	01.02.2010	L.Naik	Naik
16	Iftexhar Ali	Dilawar khan	10.03.1990	01.02.2010	L.Naik	Naik
17	Alif Khan	Qadar Khan	12.04.1991	01.02.2010	L.Naik	Naik
18	Muhammad Munir	Amin Ullah	01.01.1988	01.02.2010	L.Naik	Naik
19	Hanif ur Rehman	Said Rahman	25.02.1991	01.02.2010	L.Naik	Naik
20	Muhammad Zubir	Umar Yar	25.10.1986	01.02.2010	L.Naik	Naik
21	Anwar Zeb	Amin Zada	01.01.1990	01.02.2010	L.Naik	Naik
22	Nasir Ullah	Asaf Khan	20.08.1989	01.02.2010	L.Naik	Naik
23	Umar Zada	Muhammad Sherin	25.04.1987	01.02.2010	L.Naik	Naik
24	Nasrullah	Bacha Zada	16.04.1982	01.02.2010	L.Naik	Naik
25	Khaista Rahman	Ghulam Hazrat	06.03.1979	01.02.2010	L.Naik	Naik
26	Alam Zeb	Sultan Muhammad-	02.02.1988	01.02.2010	L.Naik	Naik
27	Fazal Rahman	Saifur Rahman	20.05.1984	01.02.2010	L.Naik	Naik
28	Kalim Ullah	Bahadar Khan	20.01.1989	01.02.2010	L.Naik	Naik
29	Muhammad Nisar	Muhammad Israr	01.01.1987	01.02.2010	L.Naik	Naik
30	Farman Ullah	Atta Ullah	28.01.1977	01.02.2010	L.Naik	Naik

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	Zubir	Aman Ullah Khan	08.12.1984	01.02.2010	L.Naik	Naik
32	Mushtaq Ahmad	Said Jan	06.03.1984	01.02.2010	L.Naik	Naik
33	Abdul Wahab	Amin Ur Rahman	18.01.1985	01.02.2010	L.Naik	Naik
34	Sultan Uddin	Muhammad Saeed	01.01.1983	01.02.2010	L.Naik	Naik
35	Ibrar Khan	Amin Khan	06.04.1988	01.02.2010	L.Naik	Naik
36	Nazir Ahmad	Muhammad Zamin	31.03.1991	01.02.2010	L.Naik	Naik
37	Ilyas Khan	Zamin Khan	18.04.1988	01.02.2010	L.Naik	Naik
38	Muhammad Ibrahim	Muhammad Ghani	02.04.1984	01.02.2010	L.Naik	Naik
39	Rahim Shah	Bacha Muhammad	05.02.1987	01.02.2010	L.Naik	Naik
40	Asadullah	Muhammad Rahim	31.03.1991	01.02.2010	L.Naik	Naik

**CASE No 4: PROMOTION OF SPOYESS TO THE RANK OF LANCE NAIKS.**

1	Imran Khan	Murad Khan	18.03.1991	01.02.2010	Sepoy	L.Naik
2	Zakir Ali	Sher Ghani	13.03.1985	01.02.2010	Sepoy	L.Naik
3	Samiu Rehman	Khaista Rehman	15.03.1990	01.02.2010	Sepoy	L.Naik
4	Inamullah	Yar Muhammad	30.06.1991	01.02.2010	Sepoy	L.Naik
5	Fazal Zada	Zardad Jan	05.01.1991	01.02.2010	Sepoy	L.Naik
6	Taj Rasool	Abbas Khan	17.05.1989	01.02.2010	Sepoy	L.Naik
7	Amjad Ali	Gul Azim	07.05.1991	01.02.2010	Sepoy	L.Naik
8	Khayal Zada	Shahzol	12.06.1987	01.02.2010	Sepoy	L.Naik
9	Karimullah	Naseeb Gul	06.04.1989	01.02.2010	Sepoy	L.Naik
10	Shahabuddin	Nasarudin	10.04.1988	01.02.2010	Sepoy	L.Naik
11	Samiullah	Masal Khan	09.02.1991	01.02.2010	Sepoy	L.Naik
12	Zahid Rehman	Habib Rehman	20.04.1982	01.02.2010	Sepoy	L.Naik
13	Wahidullah	Shahzol Khan	20.03.1983	01.02.2010	Sepoy	L.Naik
14	Kalimullah	Muhammad Anwar	20.03.1989	01.02.2010	Sepoy	L.Naik
15	Bakht Rawan	Amroz Khan	03.03.1990	01.02.2010	Sepoy	L.Naik
16	Naveed Akhter	Ghulam Haider	06.12.1980	01.02.2010	Sepoy	L.Naik
17	Mubarak Bakht	Sultan Bakht	25.03.1986	01.02.2010	Sepoy	L.Naik
18	Irfanullah	Mutabar Khan	01.05.1991	01.02.2010	Sepoy	L.Naik

	Gohar Jan	Gul Habibi Jan	12.12.1988	01.02.2010	Sepoy	L.Naik
20	Nisar Ahmad	Khaista Rehman	10.04.1991	01.02.2010	Sepoy	L.Naik
21	Samiu Rehman	Sahah Zol Fateh	01.07.1981	01.02.2010	Sepoy	L.Naik
22	Faiz ur Rehman	Jan	03.11.1984	01.02.2010	Sepoy	L.Naik
23	Khan Wali	Muhammad Amin Khan	01.03.1982	01.02.2010	Sepoy	L.Naik
24	Naveed Akhter	Muhammad Nisar	01.12.1991	01.02.2010	Sepoy	L.Naik
25	Said Nawab	Siyasat Khan	16.04.1990	01.02.2010	Sepoy	L.Naik
26	Shahidullah	Salahuddin	25.02.1990	01.02.2010	Sepoy	L.Naik
27	Fazal Wahid	Fazal Saeed	02.02.1987	01.02.2010	Sepoy	L.Naik
28	Waseem Sajjad	Amin Zada	04.04.1991	01.02.2010	Sepoy	L.Naik
29	Muhammad Saeed	Raz Muhammad	10.04.1987	01.02.2010	Sepoy	L.Naik
30	Hanifur Rehman	Bakht Shahzada	02.04.1991	01.02.2010	Sepoy	L.Naik
31	Shah Javaid	Bakht Zamin Khan	05.04.1987	01.02.2010	Sepoy	L.Naik
32	Naik Zada	Rehmanullah	08.08.1984	01.02.2010	Sepoy	L.Naik
33	Faiz Rehman	Azim Jan	01.01.1985	01.02.2010	Sepoy	L.Naik
34	Rohul Amin	Rohuddin	25.10.1984	01.02.2010	Sepoy	L.Naik
35	Hussian Shah	Shah Tamriz	01.06.1990	01.02.2010	Sepoy	L.Naik
36	Najmuddin	Nizamuddin	14.05.1984	01.02.2010	Sepoy	L.Naik
37	Misbahuddin	Salahuddin	10.04.1990	01.02.2010	Sepoy	L.Naik
38	Ajmal-Ali Khan	Shahu Din	20.12.1978	01.02.2010	Sepoy	L.Naik

Representative

Home & TA's Department  
(Member)

Representative

Commissioner Office Malakand Division  
(Member)

Commandant Dir Levies Force/  
DEPUTY COMMISSIONER DIR UPPER  
(Chairman)

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FINAL SENORITY LIST OF FEDERAL DIR LEVIES DIR UPPER APRIL-2019

S.NO	NAME	FATHER NAME	BELT NO	DATE OF ENTRY IN TO GOVT SERVICE	DATE OF BIRTH	PRESENT RANK	BASIC PAY SCALE	DATE OF PROMOTION TO THE PRESENT RANK	REMARKS
<b>SUBIDAR MAJOR BPS-16</b>									
1	Shah Yousaf	Bahadar Khan	1414	24.06.1989	7/10/1969	S.Major	16	14.11.2018	
<b>SUBIDAR BPS-13</b>									
1	Jehan Zeb	Shah Nawaz	1478	12.09.1993	12/9/1974	Subidar	13	09.11.2016	
2	Khaista Said	Swal Faqir	1480	14.09.1993	14/09/1968	Subidar	13	09.11.2016	
3	Rahman Uddin	Shah Zada	1483	16.03.1994	16/03/1974	Subidar	13	09.11.2016	
4	Muhammad Nazib	Anwar Zeb	1490	02.10.1994	2/10/1975	Subidar	13	09.01.2019	
5	Noor Islam	Mubarak Said	1493	01.12.1994	1/12/1974	Subidar	13	09.01.2019	
6	Munasib Khan	Nawsher Khan	1495	06.12.1994	6/12/1972	Subidar	13	09.01.2019	
7	Faiz ul Hakim	Bashir	1497	01.01.1995	1/1/1970	Subidar	13	09.01.2019	
8	Muhammad Israr	Naqshay	1499	01.01.1995	1/1/1973	Subidar	13	09.01.2019	
9	Ihsan Ullah	Shah Muhammad	1500	18.01.1995	18/01/1976	Subidar	13	09.01.2019	
10	Ghauso Rahman	Muhammad Amin	1505	11.08.1996	19/01/1971	Subidar	13	09.01.2019	
11	Abdur Rashid	Faiz Muhammad	1508	11.08.1996	11/10/1974	Subidar	13	09.01.2019	
<b>NAIB SUBIDAR BPS-11</b>									

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1	Raza Ullah	Amir Muhammad	1509	11.08.1996	13/01/1975	N.Subidar	11	11.11.2014
2	Gul Badshah	Khaist Muhammad	1515	11.08.1996	10/12/1972	N.Subidar	11	11.11.2014
3	Jehan Zeb	Bacha Sardar	1516	11.08.1996	3/12/1972	N.Subidar	11	11.11.2014
4	Muhammad Iqbal	Bakht Zamin	1518	11.08.1996	3/1/1979	N.Subidar	11	11.11.2014
5	Nasib Zada	Muhammad Jan	1522	11.08.1996	1/1/1970	N.Subidar	11	11.11.2014
6	Rahmat Rehaman	Fazal Rahman	1523	11.08.1996	25/05/1974	N.Subidar	11	11.11.2014
7	Muhammad Jawad Khan	Muhammad Nawshad	1524	13.08.1996	24/06/1975	N.Subidar	11	11.11.2014
8	Javed Iqbal	Muhammad Islam	1528	25.08.1996	4/3/1977	N.Subidar	11	11.11.2014
9	Fazal Raziq	Hakim Jan	1533	16.10.1996	16/10/1973	N.Subidar	11	11.11.2014
10	Izat Khan	Sadat Khan	1537	22.10.1996	22/10/1976	N.Subidar	11	14.11.2016
11	Mazhar Shah	Ahmed Khan	1539	22.10.1996	22/10/1974	N.Subidar	11	14.11.2016
12	Muhammad Ullah	Jan Muhammad	1540	25.10.1996	01/07/1967	N.Subidar	11	14.11.2016
13	Gulab Zada	Badshah Mula	1559	16.04.1998	16.04.1976	N.Subidar	11	09.01.2019
14	Allauddin	Jan Bakht Khan	1560	18.04.1998	18.04.1977	N.Subidar	11	09.01.2019
15	Gul Akbar Khan	Rahim Khan	1561	18.04.1998	18.04.1970	N.Subidar	11	09.01.2019
16	Khaista Zada	Kamin Khan	1562	21.04.1998	21.04.1973	N.Subidar	11	09.01.2019
17	Sahib Zada	Gul Ta Khan	1566	01.06.1998	01.06.1974	N.Subidar	11	09.01.2019
18	Gul Ihsan Ullah	Jehan Zeb	1568	01.06.1998	01.06.1970	N.Subidar	11	09.01.2019
19	Sher Nawaz Khan	Shah Nas Khan	1570	01.06.1998	01.06.1974	N.Subidar	11	09.01.2019
20	Muhammad Tamin Kha	Jan Muhammad	1572	01.06.1998	01.06.1976	N.Subidar	11	09.01.2019
<b>HAWALDAR BPS-08</b>								
1	Amir Badshah	Ghausul Alam	1577	11.06.1998	11.06.1979	Hawaldar	08	19.11.2013
2	Badshah Uddin	Shahab-Uddin	1588	01.03.1999	03.04.1975	Hawaldar	08	19.11.2013



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184	Muhammad Saeed	Noor Saeed	299	01.02.2010	1/3/1987	Sepoy	05	-	
185	Asel Nawab	Amir Sawab	300	01.02.2010	1/10/1987	Sepoy	05	-	
186	Sher Badar	Gul Zarin	301	01.02.2010	1/1/1989	Sepoy	05	-	
187	Habib	Rehmatullah	302	01.02.2010	10/4/1989	Sepoy	05	-	
188	Jehan Zada	Sher Khan	303	01.02.2010	1/7/1989	Sepoy	05	-	
189	Najeebullah	Fateh Khan	304	01.02.2010	22/3/1990	Sepoy	05	-	
190	Zahid Shah	Zulum Khan	305	01.02.2010	25/4/1991	Sepoy	05	-	
191	Islam Sher	Sher Zada	306	01.02.2010	1/6/1991	Sepoy	05	-	

Commandant Dir Levies  
DEPUTY COMMISSIONER  
UPPER DIR



OFFICE OF THE  
COMMANDANT DIR LEVIES/  
DEPUTY COMMISSIONER




DIR UPPER

No: 7375-80 /DC/LHC  
Dated Dir the: 27 /03/2018.

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CORRIGENDUM/OFFICE ORDER


In continuation of this office order No. 16059-63/DC/LHC/Office Order/2016 dated 14-11-2016 and as approved by the undersigned in a meeting with Subidar Major Dir Levies, All Subidars, Naib Subidars & Hawldars held on 20-03-2018 at 03:00 PM, the issuance date of the Notification/Office Order referred above in respect officials from S. No 01 to S. No 03 may please be read as 09-11-2016 instead of 14-11-2016.

  
Commandant Dir Levies/  
Deputy Commissioner,  
District Dir Upper.

**Even No & date**

Copy forwarded to the:-

1. Commissioner Malakand Division Saidu Sharif Swat.
2. Deputy Secretary (LK&B) Ministry of State & Frontier Region Division Islamabad.
3. The PS to Secretary Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar.
4. The District Account Officer Dir Upper for information and necessary action
5. Subidar Major Dir Levies.
6. Official concerned for compliance.

  
Commandant Dir Levies/  
Deputy Commissioner,  
District Dir Upper.