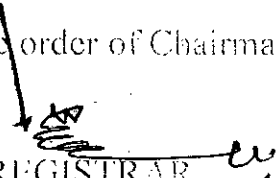


FORM OF ORDER SHEET

Court of _____

Case No.- 899 /2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/04/2023	<p>The appeal of Mr. Inamullah Khan resubmitted today by Mr. Umar Farooq Badshah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Inam Ullah Khan Computer Operator DC office Swat received today i.e. on 19.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Addresses of respondents no. 5 to 36 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Copy of report of enquiry committee mentioned in para-4 of the memo of appeal is not attached with the appeal.
- 3- Annexures of the appeal are unattested.
- 4- 38 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 1233 /S.T,

Dt. 19/4 /2023.


REGISTRAR
SERVICE TRIBUNAL -
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Umar Farooq Badshah Adv.
High Court Swat.

Respected Sir,
objection Nos 1, 3 & 4 removed. as far as objection No 2 is concerned, position is explained in Para No 5 of the memo of appeal. Further more, the Committee vide order dated 26-01-2022 did not prepared Final report due to ^{formation of} subsequent Committee vide order dated 23-09-2022, hence report not attached.
Re-submitted please. /


29/4/2023
Umar Farooq Badshah
Advocate

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

Service Appeal No. 899 / 2023

Inamullah Khan.

... Appellant

- VERSUS -

Deputy Commissioner, Swat and others.

... Respondents

INDEX

S #	Description of documents	Annexure	Pages
1.	Memorandum of service appeal	1-8
2.	Certificate	9
3.	Affidavit	10
4.	Memo Of Addresses	11-13
5.	Copies of notification / tentative seniority list, objection petition and merit list and order No. 3703-705/13/DC/Estt: dated 21.03.2023	A, B & C	15-26
6.	Copy of letter No. 3453/9/DC/Estt: dated 26-01-2022	D	27
7.	Copy of appellant's statement before Chairman and recommendations	E & F	28-30
8.	Copy of order / letter No. 37570/9/DC/Estt: dated 23-03-2022	G	31
9.	Copy of letters	H, I, J & K	32-35
10.	Copies of impugned notification dated 04-01-2023 and directions of respondent No. 2 dated 18-01-2023	L & M	36-40
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APPELLANT

INAMULLAH KHAN

COUNSELS





Umar Farooq Badshah & Muhammad Latif
Advocates High Court.

Off: 2nd Floor, Continental Plaza, Makanbagh,
Mingora, Swat.

Cell: 0333-2362446

Cell No. 0348-9177761

Dated: 19-04-2023

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

Service Appeal No. 899 / 2023

Inamullah Khan S/o Fazal Wadood, Computer Operator, PMRU
Branch, Office of the Deputy Commissioner at Gulkada, Saidu
Sharif, Swat.

... Appellant

- VERSUS -

1. Deputy Commissioner Swat at Gulkada, Saidu Sharif, Swat.
2. Commissioner Malakand Division at Saidu Sharif, Swat.
3. The Senior Member Board / Secretary to Government of
Khyber Pakhtunkhwa, Revenue and Estate Department
Peshawar.
4. Government of Khyber Pakhtunkhwa through Chief Secretary
at Civil Secretariat, Peshawar.
5. Faiz Muhammad (Computer Operator) *in* Office of the
Deputy Commissioner Swat at Gulkada, Saidu Sharif, Swat.
6. Akbar Ali (Computer Operator) *in* Office of the Deputy
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35. Rafiullah (Computer Operator) *in* Office of the Deputy Commissioner Swat at Gulkada, Saidu Sharif, Swat.
36. Imran Zeb (Computer Operator) *in* Office of the Deputy Commissioner Swat at Gulkada, Saidu Sharif, Swat.

... Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974, against the impugned tentative seniority list vide notification No. 13/DC/Est;/36 dated 03-01-2022, final seniority list bearing notification No. 13/DC/Estt;/10481 dated 04-01-2023 and order of respondent No. 1 bearing No. 3703-705/DC/Est dated 21-03-2023, whereby the appellant has illegally and unlawfully been placed, at serial No. 40 instead of placement at serial No. 8,

Prayer:

On acceptance of this appeal, the tentative seniority list vide notification No. 13/DC/Est;/36 dated 03-01-2022, final seniority list bearing notification No. 13/DC/Estt;/10481 dated 04-01-2023 and order of respondent No. 1 bearing No. 3703-705/DC/Est dated 21-03-2023, be declared illegal, unlawful, unconstitutional, void ab initio and the respondents be directed to place the appellant at serial No. 8, as per law in the seniority list.

Any other relief not specifically prayed for, but this August Court deems proper may also be granted.

Respectfully Sheweth;

1. That initially, the appellant was appointed as K.P.O (Key Punch Operator, BPS-11) by District Selection Committee vide order No. 8574/DCO/Est dated 27-04-2010 and later on the appellant was upgraded to BPS-16. Since then, the appellant is performing his duties in kind supervision of the respondents No. 1 to 4 to the best of his abilities and capabilities.
2. That respondent No. 1 vide notification No. 13/DC/Est:/36 dated 03-01-2022, issued tentative seniority list with the direction that in case of any issues, objections may be filed within fifteen days in the office of respondent No. 1. In response the appellant filed his objections on the said list within the stipulated period of time on the basis of merit list of the departmental selection committee. (Copies of notification / tentative seniority list, objection petition and merit list are annexure A to C respectively).
3. That upon receiving of objection / grievance petition of the appellant, the respondent No. 1 constituted a committee for report and recommendations (Copy of letter No. 3453/9/DC/Est: dated 26-01-2022 is annexure D).
4. That upon calling of the appellant by the Chairman of the above mentioned committee, the appellant made his submissions before the Chairman of the ibid committee. Where after the ibid committee continued their proceedings and made their recommendations, declaring the grievance of the appellant Genuine. (Copy of appellant's statement before Chairman and recommendations are annexure E & F).

5. That astonishingly, while ignoring the recommendation of the chairman of *ibid* committee, the respondent No. 1 constituted another committee vide order / letter No. 37570/9/DC/Estt: dated 23-09-2022, for the purpose, as stated in para No. 3 above, without any reason or justification (Copy of order / letter No. 37570/9/DC/Estt: dated 23-03-2022 is annexure G).
6. That the respondent No. 1 vide letter No. 136/6/DC/Estt: dated 19-10-2022 and letter No. 560/6/DC/Estt: dated 24-10-2022, solicited advice from the respondent No. 2. The respondent No. 2 vide letter No. 1241-42/2/28/Est: dated 07-11-2022, sought clarification to the effect that "*whether the seniority list was circulated amongst the computer operators on yearly basis and whether objections were raised by the applicants for rectification or otherwise*". The same was replied by respondent No. 1 vide letter No. 4958/6/DC/Estt: dated 15-11-2022 (Copies of letters are annexure H to K respectively).
7. That instead of waiting for reply and guidance of respondent No. 2, respondent No. 1 against the law, rules and norms of justice, in a very slipshod manner issued impugned notification No. 13/DC/Estt:/10481 dated 04-01-2023, though respondent No. 2 vide letter No. 279-80/2/28/Estt: dated 18-01-2023 directed, the respondent No. 1 to decide the subject case in accordance with laid down procedure/ rules. (Copies of impugned notification dated 4-1-2023 and directions of respondent no. 2 dated 18-01-2023 are annexure L & M respectively).
8. That when the appellant came to know through social media about the impugned seniority list, the appellant filed grievance petition against the impugned final seniority list. (Copy of application / grievance petition is annexure N).

9. That in response to appellant's grievance petition, respondent No. 1 issued the impugned order vide letter No. 3703-705/13/DC/Estt; dated 21-03-2023, vide which the request of the appellant was regretted against the law, rules and norms of justice, which is not sustainable in the eyes of law.

10. That appellant feeling aggrieved from the impugned orders / notifications and seniority lists issued by the respondent No. 1, is constrained to file the instant appeal on the following grounds amongst others.

Grounds:

- i. That the impugned orders / notifications and seniority list issued by the respondent No. 1 are illegal, unlawful, against the principles of natural justice and void ab initio.
- ii. That the impugned orders / notifications and seniority list are passed in a very hasty, cursory and slipshod manner.
- iii. That respondents are not authorized to deprive the appellant from his accrued right of promotion on the basis of seniority.
- iv. That appellant renders a long service in the department of respondent No. 1 and being senior from respondents No. 5 to 40 (mentioned at serials No. 8 to 39 in the impugned seniority list), the appellant is entitled to be placed at serial No. 8.
- v. That seniority list / notifications and the order of respondent No. 1 are clearly based on discrimination.
- vi. That the impugned seniority list is against the rules, policy and service laws on the subject.

- vii. That neither the respondent No. 1 has issued any tentative or final seniority list in accordance with law and rules on the subject nor served upon the appellant, which act of respondent No. 1 is against the law, rules and ineffective upon the rights of appellant and has no value in the eyes of law.
- viii. That the action and inaction of respondent No. 1 vide the impugned orders and notifications, are completely against their own rules, law and having no legal backing, hence liable to be set at naught.
- ix. That as per rules, the seniority shall be counted from the initial order of appointment in accordance with the order of merit and not from the date of arrival or charge assumption, which is completely been ignored in case of the appellant by the respondent No. 1, against the law, rules and policy. Hence, the impugned notifications / seniority lists issued by respondent No. 1 are illegal, unlawful, unconstitutional, against the rules, policy and void ab-initio.
- x. That respondent No. 1 has dealt the case of appellant in a very cursory and hasty manner, as evident from letter No. 279/80/2/28/Estt: dated 18-01-2023, which is great injustice with the appellant.
- xi. That there is not a single thing on record, which could suggest that above mentioned constituted Committee vide order/ letter 37570/9/DC/Estt: dated 23-09-2022 had made any recommendations or submitted any report before issuance of impugned list or order, thus, through the impugned notification and order, the respondents have also violated their own orders, which is gross illegality and material irregularity on part of the respondent No. 1.

- xii. That blue eyed candidates have been favoured in the impugned notifications / seniority lists, which has caused serious damage to the career of the deserving candidate / appellant, who is meritorious than those who are not even eligible.
- xiii. That eligibility criteria for the preparation of seniority list, has totally been ignored and even violated by the respondent No. 1, as being appointed on 27-04-2010, the appellant is legally eligible and lawfully entitled to be placed at serial No. 8, however, while placing the appellant at serial No. 40, the past as well as future service of the appellant has been caused with irreparable loss.
- xiv. That respondents No. 5 to 40 are neither eligible nor meritorious than the appellant.
- xv. That appellant has been condemned unheard and no proper opportunity of hearing has been provided to the appellant.
- xvi. That the conduct of respondent No. 1 is also clear from the fact that the appellant had once made his submission and appearance before the initially constituted Committee, but later on the said Committee has been changed by the respondent No. 1 without any reason or justification.
- xvii. Further grounds would be agitated during the course of arguments with prior permission.

It is therefore, humbly prayed that, on acceptance of this appeal, the tentative seniority list dated 03-01-2022, final seniority list dated 04-01-2023 and order of

respondent No. 1 bearing No. 3703-705/DC/Est dated 21-03-2023, be declared illegal, unlawful, unconstitutional, void and the respondent No. 1 be directed to place the appellant at serial No. 8 as per law in the seniority list.

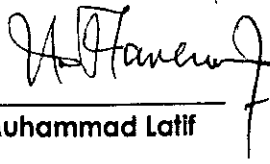
Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

Appellant:



Inamullah Khan

Counsel:



Umar Farooq Badshah & Muhammad Latif
Advocates High Court

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

Service Appeal No. _____ / 2023

Inamullah Khan.

... Appellant

- VERSUS -

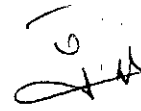
Deputy Commissioner, Swat and others.

... Respondents

Certificate

It is certified that as per instruction received from my client that no such like other service appeal has earlier been filed before this Hon'ble Court.

Appellant



Inamullah

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

Service Appeal No. _____ / 2023

Inamullah Khan.

... Appellant

- VERSUS -

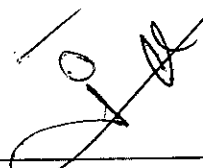
Deputy Commissioner, Swat and others.

... Respondents

Affidavit

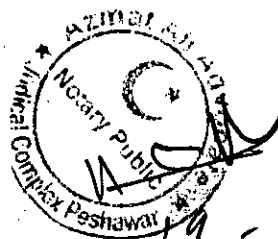
I, do hereby solemnly affirm and declares that, all the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein from this august court.

Deponent:



Inamullah
(Appellant In Person)

ATTESTED



19-4-23

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

Service Appeal No. _____ / 2023

Inamullah Khan.

... Appellant

- VERSUS -

Deputy Commissioner, Swat and others.

... Respondents

Address of Appellant:

Inamullah Khan S/o Fazal Wadood, PMRU Branch, Office of the
Deputy Commissioner at Gulkada, Saidu Sharif, Swat.

CNIC No. 15602-6306132-1

Cell No. 0333-9484463, 0345-0757517

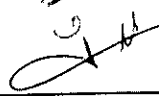
Addresses of Respondents:

1. Deputy Commissioner Swat at Gulkada, Saidu Sharif, Swat.
2. Commissioner Malakand Division at Saidu Sharif, Swat.
3. The Senior Member Board / Secretary to Government of
Khyber Pakhtunkhwa, Revenue and Estate Department
Peshawar.
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36. Imran Zeb (Computer Operator) C/o Office of the Deputy Commissioner Swat at Gulkada, Saidu Sharif, Swat.

Appellant



Inamullah



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336
Fax No: 0946-9240329

E-mail: Deputycommissionerswat1@gmail.com

No. 401-08 /13/DC/Estt:

Dated: 03/01/2022

To,

- 1- The Additional Deputy Commissioner (F&P), Swat.
- 2- All the Assistant Commissioners in Swat.


Subject:- TENTATIVE SENIORITY LISTS OF ASSISTANTS, COMPUTER OPERATORS, JUNIOR SCALE STENOGRAPHERS, SENIOR CLERKS, JUNIOR CLERKS, READER, RECORD KEEPER ALHAMD, CLASS-IV AS STOOD ON 31/12/2021.

Memo:

Enclosed please find herewith copies of the tentative seniority lists of the subject cadres as stood on 31/12/2021, for circulation among all concerned working in your respective offices for their information and necessary action.

Encls: As above.


DEPUTY COMMISSIONER,
SWAT


Assistant (BPS-16)
Deputy Commissioner office
SWAT



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

P = (16)

Dated: 03 /01/2022

NOTIFICATION NO. 13/DC/Estt: / 36

In pursuance of Section 8 (1) of the Khyber Pakhtunkhwa, Civil Servant Act, 1973, Tentative Seniority List of Computer Operators (BPS-16) of the office of Deputy Commissioner, Swat as stood on 31/12/2021 is hereby circulated for information of all concerned. Objections if any on the seniority list may be file in this office within 15 days, in case no objection received within the stipulated period this seniority list shall be deemed as Final:-

S. No	Name	Qualification	Date of Birth	Date of 1 st Entry into Govt. Service	Date of regular appointment/as Computer Operator	Remarks
1.	Mr. Anwar Hussain	MA	21/01/1978	17/04/2003	17/04/2003	
2.	Mr. Liaqat Ali	MS (CS)	05/06/1981	01/11/2005	01/11/2005	
3.	Mr. Sikandar Hayat	M.Sc	01/06/1977	01/11/2005	01/11/2005	
4.	Mr. Alam Khan	M.Sc (CS)	01/04/1978	01/11/2005	01/11/2005	
5.	Mr. Naeem Ahmad	B.Sc	01/12/1976	01/11/2005	01/11/2005	
6.	Mr. Muhammad Shoaib	FA	15/04/1972	10/11/2006	10/11/2006	
7.	Mr. Abdul Farid	MA	01/04/1982	14/07/2004 as Lab. Asst. in Agri. Res	27/04/2010	
8.	Mr. Faiz Muhammad	BA	01/01/1973	27/04/2010	27/04/2010	
9.	Mr. Akbar Ali -I	MA	01/04/1979	27/04/2010	27/04/2010	
10.	Mr. Fazal Wahab	MA	20/04/1978	03/06/2008 as Secretary UC	28/04/2010	
11.	Mr. Barkat Ali	MA	04/05/1969	28/04/2010	28/04/2010	
12.	Mr. Fazal Hayat-I	BA	01/01/1976	28/04/2010	28/04/2010	
13.	Mr. Usman Ali	MA	10/05/1976	28/04/2010	28/04/2010	
14.	Mr. Noor Muhammad	MA	01/01/1977	28/04/2010	28/04/2010	
15.	Mr. Akhtar Hussain	MA	12/04/1978	28/04/2010	28/04/2010	
16.	Mr. Farman Ali	MA	10/03/1979	28/04/2010	28/04/2010	
17.	Mr. Amir Zeb	MA	09/05/1979	28/04/2010	28/04/2010	
18.	Mr. Khaliq Dad Khan	MBA	04/12/1980	28/04/2010	28/04/2010	
19.	Mr. Qaisar Khan	BA	01/01/1981	28/04/2010	28/04/2010	
20.	Mr. Nadeem	BA	13/04/1981	28/04/2010	28/04/2010	
21.	Mr. Halder Hayat	BS (CS)	05/02/1982	28/04/2010	28/04/2010	

[Signature]
Assistant (BPS-16)
Deputy Commissioner
Swat

[Handwritten mark]

59.	Mr. Israr Ali	BS (EE)	03/03/1987	24/03/2016	24/03/2016
60.	Mr. Naveed Ahmad	BS (CS)	03/05/1987	24/03/2016	24/03/2016
61.	Mr. Javed Iqbal	BS (CS)	25/06/1987	24/03/2016	24/03/2016
62.	Mr. Shamsuddin	BS (CS)	30/01/1988	24/03/2016	24/03/2016
63.	Mr. Shehzad Ahmad	BS (CS)	01/08/1988	24/03/2016	24/03/2016
64.	Mr. Rizwan	BS (CS)	21/05/1989	24/03/2016	24/03/2016
65.	Mr. Muhammad Atif	MS	17/03/1990	24/03/2016	24/03/2016
66.	Mr. Luqman Tariq	BS (CS) <i>MS/CS</i>	05/05/1990	24/03/2016	24/03/2016
67.	Mr. Obaid Ahmad	BS (CS)	29/06/1990	24/03/2016	24/03/2016
68.	Mr. Abdullah	BS (CS)	05/08/1990	24/03/2016	24/03/2016
69.	Mr. Mehmood Khan	BS (CS)	11/08/1990	24/03/2016	24/03/2016
70.	Mr. Mujib Khan	BS (IT)	14/03/1991	24/03/2016	24/03/2016
71.	Mr. Abdul Nasir	BS (CS)	25/03/1991	24/03/2016	24/03/2016
72.	Mr. Abdul Ahad	M. Sc	18/03/1992	24/03/2016	24/03/2016
73.	Mr. Imran Khan	BS (CS)/LLB	11/04/1993	24/03/2016	24/03/2016
74.	Mr. Bahlool Jan	BS (CS)	20/07/1993	24/03/2016	24/03/2016
75.	Mr. Imran Ali Shah	BS (CS)	14/02/1994	24/03/2016	24/03/2016
76.	Mr. Saud Al Faisal	BS (EE) <i>MS PM</i>	05/02/1987	28/03/2016	28/03/2016
77.	Syed Noman Ali Shah	BS (CS)	07/11/1992	13/06/2016	13/06/2016
78.	Mr. Afrasiab Khan	BS (CS)	26/12/1988	29/04/2019	29/04/2019
79.	Mr. Salman Khan	BS (CS)	02/08/1992	16/12/2020	16/12/2020
80.	Mr. Muhammad Ashraf	Bs(EE)	15/09/1991	16/12/2020	17/12/2020

P = (17)

Fuzal
 Assistant (BPS-16)
 Deputy Commissioner Office
 SW4

No. 37-124 /13/DC/Estt:

Copy forwarded to:-


- 1- The Additional Deputy Commissioner (Finance & Planning), Swat.
- 2- All the Assistant Commissioners in Swat.
for circulation among the Computer Operators working in their respective offices.
- 3- All Computer Operators working in main office.

[Signature]
 DEPUTY COMMISSIONER
 SWAT

[Signature]
 DEPUTY COMMISSIONER
 SWAT

23.	Mr. Inayat Ur Rehman	BA	15/04/1982	28/04/2010	28/04/2010	
24.	Mr. Amin Ul Haq	MA	16/04/1982	28/04/2010	28/04/2010	
25.	Mr. Amjad Ullah	MA	01/01/1983	28/04/2010	28/04/2010	
26.	Mr. Akbar Ali-II	MA	05/04/1983	28/04/2010	28/04/2010	
27.	Mr. Qaisar Ali	BA	01/08/1983	28/04/2010	28/04/2010	
28.	Mr. Murad Ali	BA	14/02/1984	28/04/2010	28/04/2010	
29.	Mr. Fazal Haq	BA/LLB	05/01/1985	28/04/2010	28/04/2010	
30.	Mr. Feroz Khan	MA	25/01/1985	28/04/2010	28/04/2010	
31.	Mr. Muhammad Haleemuddin	MBA	13/04/1985	28/04/2010	28/04/2010	
32.	Mr. Irfan Ali	M.Sc	20/04/1986	28/04/2010	28/04/2010	
33.	Mr. Mushtaq Ahmad	MBA/MA	02/05/1986	28/04/2010	28/04/2010	
34.	Mr. Amjad Islam	BA	03/03/1987	28/04/2010	28/04/2010	
35.	Mr. Muhammad Ayaz	MA	12/03/1987	28/04/2010	28/04/2010	
36.	Syed Iftikhar Hussain	B.Sc	15/11/1988	28/04/2010	28/04/2010	
37.	Mr. Fazal Hayat-II	MA	12/03/1988	27/06/2008 in Agri. Rese	29/04/2010	
38.	Mr. Rafiullah	MCS	14/04/1979	29/04/2010	29/04/2010	
39.	Mr. Imran Zeb	MA/MBA	01/07/1980	30/04/2010	30/04/2010	
40.	Mr. Inamullah	MA/LLB	02/01/1982	06/05/2010	06/05/2010	
41.	Mr. Muhammad Saleem	MBA	01/10/1984	07/05/2010	07/05/2010	
42.	Mr. Haider Ali	M.Sc	01/04/1981	18/02/2009	18/06/2012	Transf BOR o
43.	Mr. Faheem Khan	M. Sc (CS)	15/10/1981	05/12/2013	05/12/2013	
44.	Miss. Sheema Habib	MS	15/04/1982	05/12/2013	05/12/2013	
45.	Mr. Ziaullah Khan	MA	04/02/1983	05/12/2013	05/12/2013	
46.	Mr. Mehboob Alam	BA	04/04/1983	05/12/2013	05/12/2013	
47.	Mr. Irshad Ahmad	MBA	15/08/1983	05/12/2013	05/12/2013	
48.	Mr. Shahid Ali	M.Sc	10/09/1983	05/12/2013	05/12/2013	
49.	Mr. Ikramullah	BS (IT)	11/11/1984	05/12/2013	05/12/2013	
50.	Mr. Assad Ali	MBA/MA	08/01/1985	05/12/2013	05/12/2013	
51.	Mr. Arshad	MS (CS)	03/03/1987	06/12/2013	06/12/2013	
52.	Mr. Habib Ur Rehman	MS MS (CS)	14/03/1988	09/12/2013	09/12/2013	
53.	Mr. Muhammad Junaid Khan	MS	02/03/1982	19/12/2013	19/12/2013	
54.	Mr. Naveedullah	BS (CS)	02/02/1988	01/06/2011 as CO in Infor. Deptt.	24/03/2016	
55.	Mr. Muhammad Akbar Khan	BS (CE)	13/03/1986	29/09/2015 as G. Operator	24/03/2016	
56.	Mr. Miraj Ul Haq	BS (CS)	10/04/1983	24/03/2016	24/03/2016	
57.	Mr. Abdur Razaq	BS (IT)	03/01/1985	24/03/2016	24/03/2016	
58.	Mr. Shujaat Ali	BS (IT)	01/03/1985	24/03/2016	24/03/2016	
		BS (SE)	12/03/1985	24/03/2016	24/03/2016	

P-18


 Assistant (BPS-1054)
 Deputy Commissioner
 Swat

P=19

To,

The Deputy Commissioner
Swat.

Subject: Tentative Seniority Lists of Assistants, Computer Operators, Junior Scale
Stenographers, Senior Clerks, Junior Clerks, Reader, Record Keeper Alhamd,
Class-IV as Stood On 31/12/2021

Respected Sir,

Reference letter 401-08/13/DC/Estt: dated 03.01.2022 on the subject noted above
regarding Notification No: 13/DC/Estt:/36 dated. 03.01.2022.

It submitted that I have an objection on the tentative seniority list of computer
operator and i.e. that calculating seniority I have been placed on arrival basis at serial No. 40 while
at merit list I had obtained/occupied Serial No. 02.

It is therefore requested, that the final seniority list may be made based on merit
list instead of arrival date and time please.

Copy of rules be submitted if required.

Yours faithfully

Inam Ullah Khan
Computer Operator.

EA
2/4
DC Swat
13/1/2022

Rub
Assistant (BPS-16)
Deputy Commissioner office
Swat

2010

P=20

MERIT LIST OF CANDIDATES APPEARED FOR THE POST OF KPO

S.No.	Name and Home address.	T. Marks	Interview Marks.	Total.
1-	Qaisar Ali s/o Sher Alam Khan of Moh: Banjarian Main Bazar Mingora.	18	08	26
2-	Inamullah Khan s/o Farid Wadood of Saidu Sharif.	15	07	22
3-	Akbar Ali s/o M. J. Wadood of Saidu Sharif.	15	06	21
4-	Qaisar Khan s/o Saadul Wahab of Saidu Sharif.	15	06	21
5-	Ranullah s/o Dost Muhammad Khan of Faiz Abad Swat.	15	06	21
6-	Noor Muhammad Khan s/o Nowsherwan Khan of K. Kheia.	15	06	21
7-	Amir Khan Khan s/o Fazal Jull of Kama Banda Swat.	15	06	21
8-	Amir Farid s/o Kabalay of Nalkot Matta.	13	08	21
9-	Yasir Akbar s/o Ghous Bahadur of Qambar Swat.	14	06	20
10-	Amir Farid s/o Ghous Bahadur of Qambar Swat.	13	06	19
11-	Amir Farid s/o Ghous Bahadur of Qambar Swat.	12	06	18
12-	Zaman Zeh s/o Arwan Zeh of Malyan Swat.	12	06	18
13-	Amir Khan s/o Ghous Bahadur of Qambar Swat.	14	04	18
14-	Amir Farid s/o Ghous Bahadur of Qambar Swat.	12	06	18
15-	Amir Farid s/o Ghous Bahadur of Qambar Swat.	10	08	18
16-	Amir Farid s/o Ghous Bahadur of Qambar Swat.	10	07	17
17-	Amir Farid s/o Ghous Bahadur of Qambar Swat.	13	08	21

Scanned with CamScanner

18.	Haider Hussain s/o Khalid Khan of Shingra Dangra Sewa	06	06	16
19.	Khalid Das Khan s/o Mirand of Qambar Sewa	06	06	16

20.	Irfan Ali s/o Shern Zada Wahan of Bahrain Sewa	09	09	19
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21.	Amir Zeb s/o Alam Zeb of Kuza Parda Sewa	06	09	16
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22.	Arifadullah s/o Nader Khan of Dangra Sewa	02	06	13
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23.	Fazal Hussain s/o Farid Maula of Qambar Sewa	09	07	15
-----	--	----	----	----

24.	Akbar Ali s/o Gobur Wali of Karia Sewa	10	07	15
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25.	Ikrampullah s/o Muhammad Zarna of Chagral Marra	03	07	13
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26.	Ghous Ali s/o Nawab Hussain of Sakhara Niagra	11	10	16
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27.	Muhammad Hussain s/o Muhammad of Badra Sewa	04	06	13
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28.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	06	13
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29.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	06	13
-----	--	----	----	----

30.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	06	13
-----	--	----	----	----

31.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	06	13
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32.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	07	13
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33.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	07	13
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34.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	07	13
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35.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	07	13
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36.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	07	13
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37.	Muhammad Hussain s/o Muhammad of Chagral Marra	06	07	13
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Handwritten signature and initials.

11. 10. 21

39-	Fazal Hayat s/o Faqir Illahi of Manglawar.	06	07	13
40-	Murad Ali s/o Ali karim of Qambar Swat.	06	06	12
41-	Inayatullah Rahman s/o Muhammad Rahman of Mingora.	06	05	11
42-	Farman Ali s/o Habibur Rahman of Amankot, Swat.	06	05	11

Handwritten initials and a circled number '23'.

1-5
15 First Ave (Habibpur)

- 6-11-05 - DCO Office
- 02 - (Habibpur) Niya
- 01 - (Habibpur)

- 13-

- 17-20 09 4...
- 18-20 03 ...
- 21-23 03 ...
- 24-25 02 ...

... with DCO office ...
Deployment/Part

LIST OF COMPUTER OPERATORS APPOINTED DURING THE YEAR 2010

S. No	Name	Date of Birth	Date of appointment	Date of arrival	Remarks <i>Interview Marks</i>
					26
1.	Qaisar Ali	14/02/1984	27/04/2010	28/04/2010	22
2.	Inamullah	01/10/1984	27/04/2010	07/05/2010	21
3.	Akber Ali-I	01/04/1979	27/04/2010	27/04/2010	21
4.	Qaisar Khan	01/01/1981	27/04/2010	28/04/2010	21
5.	Rafiqullah	01/07/1960	27/04/2010	30/04/2010	21
6.	Noor Muhammed Khan	01/01/1977	27/04/2010	28/04/2010	21
7.	Amjed Islem	12/03/1987	27/04/2010	28/04/2010	21
8.	Abdul Farid	01/04/1982	27/04/2010	27/04/2010	21
9.	Syed Ifikhar Hussain	12/03/1988	27/04/2010	28/04/2010	20
10.	Amin Ul Haq	01/01/1963	27/04/2010	28/04/2010	19
11.	Imran Zeb	12/01/1982	27/04/2010	06/05/2010	18
12.	Feroz Khan	13/04/1985	27/04/2010	28/04/2010	18
13.	Faiz Muhammad	01/01/1973	27/04/2010	27/04/2010	17
14.	Haider Hayat	05/02/1982	27/04/2010	28/04/2010	16
15.	Khaliq Dad Khan	04/12/1980	27/04/2010	28/04/2010	16
16.	Irfan Ali	02/05/1986	27/04/2010	28/04/2010	16
17.	Amir Zeb	09/05/1979	27/04/2010	28/04/2010	16
18.	Amjad Ullah	05/04/1983	27/04/2010	28/04/2010	15
19.	Fazal Haq	25/01/1985	27/04/2010	28/04/2010	15

Pg (24)

20.	Akbar Ali-II	01/08/1983	27/04/2010	28/04/2010	15
21.	Barkat Ali	04/05/19769	27/04/2010	28/04/2010	14
22.	Muhammad Haleemuddin	20/04/1986	27/04/2010	28/04/2010	14
23.	Mushtaq Ahmad	03/03/1987	27/04/2010	28/04/2010	14
24.	Muhammad Ayaz	15/11/1988	27/04/2010	28/04/2010	14
25.	Akhtar Hussain	12-4-79	27/04/2010	28/04/2010	13
26.	Fazal Hayat-I	01/01/1976	27/04/2010	28/04/2010	13
27.	Usman Ali	10/05/1976	27/04/2010	28/04/2010	13
28.	Fazal Khuda	15/04/1982	27/04/2010	28/04/2010	13
29.	Nadeem	13/04/1981	27/04/2010	28/04/2010	13
30.	Fazal Wahab	20/04/1978	27/04/2010	28/04/2010	13
31.	Fazal Hayat-II	14/04/1979	27/04/2010	29/04/2010	13
32.	Murad Ali	05/01/1985	27/04/2010	28/04/2010	12
33.	Inayat Ur Rehman	16/04/1982	27/04/2010	28/04/2010	11
34.	Farman Ali	10/04/1979	27/04/2010	28/04/2010	11
35.	Muhammad Saleem	01/04/1981	18/02/2009	18/06/2012	Transferred from BOR on 18/06/2012



P4 (26)

OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336
Fax No: 0946-9240329

No. 3703-705 /13/DC/Estt:

E-mail: Deputycommissionerswat1@gmail.com

Dated: 21/3 /2023

To,

1. Mr. Inamullah ,Computer Operator
2. Mr. Qaisar Khan, Computer Operator.
3. Mr. Abdul Nasar, Computer Operator.

Subject:- SENIORITY LIST OF COMPUTER OPERATORS

Reference your applications dated 30/1/2023 and 14/03/2023 regarding objection on the seniority list of Computer Operators. You are hereby informed that your request cannot be entertain at this stage.


DEPUTY COMMISSIONER,
SWAT

P# 27



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336
Fax No: 0946-9240329

No. 3453 /9/DC/Estt:

E-mail: Deputycommissionerswat1@gmail.com

Dated: 26/01/2022

ORDER.

A Committee comprises of the following is hereby constituted to redressed objection/grievances of the Computer Operators raised on the seniority list issued vide this office Notification No. 13/DC/Estt/36 dated 03/01/2022.

The committee shall submit its report alongwith recommendations upon the objection within 30 days to the undersigned.

- 1- Finance Officer DC office..... Chairman
- 2- Superintendent DC Office..... Member
- 3- Establishment Assistant..... Member

No. 345456 /9/DC/Estt:

Copy forwarded to the:-

- 1- Finance Officer, Swat
- 2- Superintendent of this office.
- 3- Establishment Assistant of this office

DEPUTY COMMISSIONER
SWAT

Assistant (BPS-16)
Deputy Commissioner office
SWAT

DEPUTY COMMISSIONER,
SWAT

To,

The Chairman.....PS to DC Swat,
Committee for Objections on Tentative
Seniority List.

P# 28

Subject:

OBJECTIONS ON SENIORITY LIST...FEW IMPORTANT POINTS.

Sir,

Following is submitted for consideration please:-

1. That I was appointed as Key Punch Operator vide DCO Swat order No. 8574/DCO/Estt dated 27.04.2010.
2. That Tentative Seniority List has been issued time and again and my objections have not been entertained.
3. That according to rules, seniority list of all employees appointed on the batch is maintained as per Merit list and not on arrival basis while the seniority list issued to me is maintained on arrival date/charge assumption.
4. That maintaining the same on arrival report basis will otentially cause me irreparable loss in my future career.
5. That after due consultation with other friends/colleagues, I have submitted application repeatedly but fate of the same is unknown.
6. That now a committee has been constituted to redress grievances of the employees under your chairmanship.
7. That my application still stands on time being fresh cause of action as a fresh tentative seniority list has been issued and I have submitted my objection within the stipulated time.

[Signature]
Assistant (BPS-16)
12-pet) (committee office
10/4

It is therefore very humbly prayed that on acceptance of this application the seniority list may be corrected and maintained on merit list instead of arrival time and date.

I shall be thankful for this act of kindness.

Yours faithfully

[Signature]
27/4/2022
Inam Ullah Khan

E A
[Signature]
27/4/22

P# (29)

Should be made on merit which assigned by the DSC. As the objection of the applicants seems genuine and the other hand perusal of the case is time barred, if agreed both the applicants alongwith other official whom suffered in the said seniority list may called for arbitration or otherwise. Submitted please

Sy/att

Para, 5/W.

ty
16/05/2022

9. Para 8/W is worth perusal please.

F.O.

In light of above para. It has been clarified that upto date no final seniority list has been issued by this office and on the tentative seniority list there is no any signature of the Computer Operators and no copy handed to any C.A for filing objections.

10- In pursuance to rule 1(b) d the objections of the applicants

P# 30

Merr

seems genuine,

11-

submitted for perusal
further orders please.

ADC (G)


18/8

P# 31



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336
Fax No: 0946-9240329

No. 37690 /9/DC/Estt:

E-mail: Deputycommissionerswat1@gmail.com

Dated: 23/09 /2022

ORDER.

A Committee comprises of the following is hereby constituted to redress objection/grievances of -the Computer Operators raised on the seniority list issued vide this office Notification No. 13/DC/Estt/36 dated 03/01/2022.

The committee shall submit its report alongwith recommendations upon the objection within 30 days to the undersigned.

- 1- Additional Deputy Commissioner (G)..... Chairman
- 2- Finance Officer DC office..... Member
- 3- Establishment Assistant.....Member

376773
No. _____ /9/DC/Estt:

[Signature]
DEPUTY COMMISSIONER,
SWAT

Copy forwarded to the:-

- 1- Additional Deputy Commissioner(G), Swat
- 2- Finance Officer, Swat
- 3- Establishment Assistant of this office

[Signature]
Assistant (BPS-16)
Deputy Commissioner office
SWAT

[Signature]
DEPUTY COMMISSIONER,
SWAT

OFFICE OF THE DEPUTY COMMISSIONER, SWAT

P# 32



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336
Fax No: 0946-9240329

No. 136 /6/DC/Estt:

E-mail: deputycommissionerswat1@gmail.com

Dated: 19-10- /2022

To

The Commissioner, Malakand Division
at Saidu Sharif swat

Subject: TENTATIVE SENIORITY LIST OF COMPUTER OPERATOR AS
STOOD ON 31-12-2021

Please refer the subject cited above.

It is stated that M/S Inamullah Khan and Qaiser Khan, Computer Operators of this office have submitted applications/objections on the seniority list of Computer Operators (BPS-16) by stating that the seniority list of Computer Operators has been prepared on the basis of arrival report/age instead of merit which has affected their seniority.

It worth to mention here that 35 x Computer Operators were appointed in the office of Ex-DOR/Collector, Swat by the then DCO Swat on 27/04/2010 and the seniority list was prepared on the basis of arrival reports/age. The same was frequently notified and circulated among the incumbents till date, however objection have been filed by the officials after lapse of almost 13 years.

Keeping in view the above, it is requested that this office may be advised that correction in the seniority list of Computer Operators at this stage can be made or otherwise, please.

[Signature]
Assistant (BPS-16)
Deputy Commissioner office
SWAT

[Signature]
DEPUTY COMMISSIONER,

OFFICE OF THE DEPUTY COMMISSIONER, SWAT

P # 33

Tel No: 0946-9240336

No. 560 /6/DC/Estt

Fax No: 0946-9240329

E-Mail: deputycommissionerswat1@gmail.com

Dated: 24-10- /2022

To:

The Commissioner, Malakand Division
At Saidu Sharif Swat.

Subject: TENTATIVE SENIORITY LIST OF COMPUTER OPERATOR AS
STOOD ON 31.12.2021.


In continuation this office letter No. 136/6/DC/Estt: dated 19-10-2022 on the subject cited above.

Tentative seniority list was issued by this office vide letter No. 13/DC/Estt:/36 dated 03/01/2022 under section 8(1) of the Khyber Pakhtunkhwa, Civil Servant Act, 1973 with the instructions that objections if any may be filed in this office within 15 days (copy attached).

Resultantly M/S Inam Ullah Khan and Qaisar Khan, Computer Operators of this office have submitted applications / objections on the seniority list of Computer Operators (BPS-16) with due time, by stating that the seniority list of Computer Operators has been prepared on the basis arrival report instead of final merit Departmental Selection Committee (DSC) which has affected their seniority.

It is worth mentioning that 35 X Computer Operators were appointed in the office of Ex-DOR/Collector, Swat by the then DCO Swat on 27.04.2010 and the seniority list was prepared on the basis of arrival reports.

Keeping the above in view it is requested that this office may ^{be} advised that whether the seniority list of Computer Operators may be notified on the basis of final merit list of DSC or on arrival reports/age under the prevailing rules/policy please.


Assistant (BPS-16)
Deputy Commissioner office
Swat


Deputy Commissioner
Swat

P # (34)

secretarytcmml@gmail.com

Commissioner Malakand Division

@commissionermlkd



OFFICE OF THE
COMMISSIONER MALAKAND DIVISION
SADC SUKHE SWAT

No. 1241-42 /2/21/Estt.:

Dated: 07/11/2022

To

The Deputy Commissioner, Swat.

Subject:-

TENTATIVE SENIORITY LIST OF COMPUTER OPERATOR AS STOOD ON
31.12.2021.

Dear Sir,

I am directed to refer to your letters No 560/6/DC, dated 24/10/2022 and No 136/6/DC/Estt., dated 19/10/2022, on the above noted subject

2. I am further directed to request that this office may be apprised whether the seniority list was circulated among the Computer Operators on yearly basis and whether objections were raised by the applicants for rectification in the seniority list or otherwise please.

Yours faithfully,

(MUIHAMMAD ILYAS)
ASSISTANT TO COMMISSIONER (REV/GEN)
MALAKAND DIVISION.

Endst:No & Date Even.

Copy forwarded to PS No Commissioner Malakand Division.

Assistant (BPS-16)
Deputy Commissioner office
Swat

ASSISTANT TO COMMISSIONER (REV/GEN)
MALAKAND DIVISION.

OFFICE OF THE DEPUTY COMMISSIONER, SWAT

P# 35



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336

Fax No: 0946-9240329

E-mail: deputycommissionerswat1@gmail.com

No. 4958 /6/DC/Estt;

Dated: 15-11- /2022

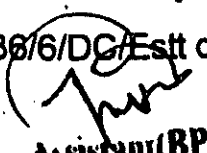
To

The Assistant to Commissioner (Rev/Gen)
Malakand Division

Subject: TENTATIVE SENIORITY LIST OF COMPUTER OPERATOR AS
STOOD ON 31-12-2021

Reference your letter No. 1241-42/2/28/Estt: dated 07-11-2022 on the subject cited above.

In this regard it is inform that the tentative/final seniority list was notified and circulated among the incumbents in first month of each year, and on 13-01-2022 two computer operators namely Mr. Inamullah and Mr. Qaisar Khan have raised objection on the subject seniority list and the case for advise has been sent your office vide letter No. 138/6/DC/Estt dated 19-10-2022, please.


Assistant (BPS-16)
Deputy Commissioner office
swat


DEPUTY COMMISSIONER,
SWAT

P# (36)



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Tel No: 0946-9240336

Fax No: 0946-9240329

E-mail: Deputycommissionerswat1@gmail.com

No. 10450-57/13/DC/Estt:

Dated: 04/01/2022

To,

- 1- The Additional Deputy Commissioner (F&P), Swat.
- 2- All the Assistant Commissioners in Swat.

Subject:- SENIORITY LISTS OF ASSISTANTS, COMPUTER OPERATORS, JUNIOR SCALE STENOGRAPHERS, SENIOR CLERKS, JUNIOR CLERKS, READER, RECORD KEEPER ALHAMD, CLASS-IV AS STOOD ON 31/12/2022.

Memo:

Enclosed please find herewith copies of the e seniority lists of the subject cadres as stood on 31/12/20221, for circulation among all concerned working in your respective offices for their information and necessary action.

Encls: As above.

DEPUTY COMMISSIONER,
SWAT



OFFICE OF THE DEPUTY COMMISSIONER, SWAT.

Dated: 04 /01/2023

NOTIFICATION NO. 13/DC/Estt: 1 10458

In pursuance of Section 8 (1) & (5) of the Khyber Pakhtunkhwa, Civil Servant Act, 1973, Final Seniority List of Computer Operator (BPS-16) (Revised) of the office of Deputy Commissioner, Swat as stood on 31/12/2022 is hereby notified for information and necessary action of all concerned.

S. No	Name	Qualification	Date of Birth	Date of 1 st Entry into Govt. Service	Date of regular appointment/as Computer Operator	Remarks
1.	Mr. Anwar Hussain	MA	21/01/1978	17/04/2003	17/04/2003	
2.	Mr. Liaqat Ali	MS (CS)	05/06/1981	01/11/2005	01/11/2005	
3.	Mr. Sikandar Hayat	M.Sc	01/06/1977	01/11/2005	01/11/2005	
4.	Mr. Alam Khan	M.Sc (CS)	01/04/1976	01/11/2005	01/11/2005	
5.	Mr. Naeem Ahmad	B.Sc	01/12/1976	01/11/2005	01/11/2005	
6.	Mr. Muhammad Shoaib	FA	15/04/1972	10/11/2006	10/11/2006	
7.	Mr. Abdul Farid	MA	01/04/1982	14/07/2004 as Lab: Asst In Agri: Res	27/04/2010	
8.	Mr. Faiz Muhammad	BA	01/01/1973	27/04/2010	27/04/2010	
9.	Mr. Akbar Ali -I	MA	01/04/1979	27/04/2010	27/04/2010	
10.	Mr. Fazal Wahab	MA	20/04/1978	03/06/2008 as Secretary UC	28/04/2010	
11.	Mr. Barkat Ali	MA	04/05/1969	28/04/2010	28/04/2010	
12.	Mr. Fazal Hayat-I	BA	01/01/1976	28/04/2010	28/04/2010	
13.	Mr. Usman Ali	MA	10/05/1976	28/04/2010	28/04/2010	
14.	Mr. Noor Muhammad	MA	01/01/1977	28/04/2010	28/04/2010	
15.	Mr. Akhtar Hussain	MA	12/04/1978	28/04/2010	28/04/2010	
16.	Mr. Farman Ali	MA	10/03/1979	28/04/2010	28/04/2010	
17.	Mr. Amir Zeb	MA	09/05/1979	28/04/2010	28/04/2010	
18.	Mr. Khaliq Dad Khan	MBA	04/12/1980	28/04/2010	28/04/2010	
19.	Mr. Qaisar Khan	BA	01/01/1981	28/04/2010	28/04/2010	
20.	Mr. Nadeem	BA	13/04/1981	28/04/2010	28/04/2010	
21.	Mr. Halder Hayat	BS (CS)	05/02/1982	28/04/2010	28/04/2010	

22.	Mr. Fazal Khuda	MA	15/04/1982	28/04/2010	28/04/2010	
23.	Mr. Inayat Ur Rehman	MA	16/04/1982	28/04/2010	28/04/2010	
24.	Mr. Amin Ul Haq	MA	01/01/1983	28/04/2010	28/04/2010	
25.	Mr. Amjad Ullah	MA	05/04/1983	28/04/2010	28/04/2010	
26.	Mr. Akbar Ali-II	M.A	01/08/1983	28/04/2010	28/04/2010	
27.	Mr. Qaisar Ali	BA	14/02/1984	28/04/2010	28/04/2010	
28.	Mr. Murad Ali	BA/LLB	05/01/1985	28/04/2010	28/04/2010	
29.	Mr. Fazal Haq	MA	25/01/1985	28/04/2010	28/04/2010	
30.	Mr. Feroz Khan	MBA	13/04/1985	28/04/2010	28/04/2010	
31.	Mr. Muhammad Haleemuddin	M.Sc	20/04/1986	28/04/2010	28/04/2010	
32.	Mr. Irfan Ali	MBA/MA	02/05/1986	28/04/2010	28/04/2010	
33.	Mr. Mushtaq Ahmad	BA	03/03/1987	28/04/2010	28/04/2010	
34.	Mr. Amjad Islam	MA	12/03/1987	28/04/2010	28/04/2010	
35.	Mr. Muhammad Ayaz	B.Sc	15/11/1988	28/04/2010	28/04/2010	
36.	Syed Ifikhar Hussain	MA	12/03/1988	27/06/2008 In Agri: Rese	29/04/2010	
37.	Mr. Fazal Hayal-II	MCS	14/04/1979	29/04/2010	29/04/2010	
38.	Mr. Rafiullah	MA/MBA	01/07/1980	30/04/2010	30/04/2010	
39.	Mr. Imran Zeb	MA/LLB	02/01/1982	06/05/2010	06/05/2010	
40.	Mr. Inamullah	MBA	01/10/1984	07/05/2010	07/05/2010	
41.	Mr. Muhammad Saleem	M.Sc	01/04/1981	18/02/2009	18/06/2012	Transferred from BOR on 18/06/2012
42.	Mr. Haider Ali	M. Sc (CS)	15/10/1981	05/12/2013	05/12/2013	
43.	Mr. Faheem Khan	MS	15/04/1982	05/12/2013	05/12/2013	
44.	Miss. Sheema Habib	MA	04/02/1983	05/12/2013	05/12/2013	
45.	Mr. Ziaullah Khan	BA	04/04/1983	05/12/2013	05/12/2013	
46.	Mr. Mehboob Alam	MBA	15/08/1983	05/12/2013	05/12/2013	
47.	Mr. Irshad Ahmad	M.Sc	10/09/1983	05/12/2013	05/12/2013	
48.	Mr. Shahid Ali	BS (IT)	11/11/1984	05/12/2013	05/12/2013	
49.	Mr. Ikramullah	MBA/MA	08/01/1985	05/12/2013	05/12/2013	
50.	Mr. Assad Ali	MS (CS)	03/03/1987	06/12/2013	06/12/2013	
51.	Mr. Arshad	M.Sc	14/03/1988	09/12/2013	09/12/2013	
52.	Mr. Habib Ur Rehman	MS	02/03/1982	19/12/2013	19/12/2013	
53.	Mr. Muhammad Junaid Khan	BS (CS)	02/02/1988	01/06/2011 as CO in Infor. Deptt.	24/03/2016	
54.	Mr. Naveedullah	BS (CE)	13/03/1986	29/09/2015 as G. Operator	24/03/2016	
55.	Mr. Muhammad Akbar Khan	BS (CS)	10/04/1983	24/03/2016	24/03/2016	
56.	Mr. Miraj Ul Haq	BS (IT)	03/01/1985	24/03/2016	24/03/2016	
57.	Mr. Abdur Razaq	BS (IT)	01/03/1985	24/03/2016	24/03/2016	
58.	Mr. Shujaat Ali	BS (SE)	12/03/1985	24/03/2016	24/03/2016	

59.	Mr. Israr Ali	BS (EE)	03/03/1987	24/03/2016	24/03/2016	
60.	Mr. Naveed Ahmad	BS (CS)	03/05/1987	24/03/2016	24/03/2016	
61.	Mr. Javed Iqbal	BS (CS)	25/06/1987	24/03/2016	24/03/2016	
62.	Mr. Shamsuddin	BS (CS)	30/01/1988	24/03/2016	24/03/2016	
63.	Mr. Shehzad Ahmad	BS (CS)	01/08/1988	24/03/2016	24/03/2016	
64.	Mr. Rizwan	BS (CS)	21/05/1989	24/03/2016	24/03/2016	
65.	Mr. Muhammad Atif	MS	17/03/1990	24/03/2016	24/03/2016	
66.	Mr. Luqman Tariq	BS (CS)	05/05/1990	24/03/2016	24/03/2016	
67.	Mr. Obaid Ahmad	BS (CS)	29/06/1990	24/03/2016	24/03/2016	
68.	Mr. Abdullah	BS (CS)	05/08/1990	24/03/2016	24/03/2016	
69.	Mr. Mehmood Khan	BS (CS)	11/08/1990	24/03/2016	24/03/2016	
70.	Mr. Mujib Khan	BS (IT)	14/03/1991	24/03/2016	24/03/2016	
71.	Mr. Abdul Nasir	BS (CS)	25/03/1991	24/03/2016	24/03/2016	
72.	Mr. Abdul Ahad	M. Sc	18/03/1992	24/03/2016	24/03/2016	
73.	Mr. Imran Khan	BS (CS)/LLB	11/04/1993	24/03/2016	24/03/2016	
74.	Mr. Bahool Jan	BS (CS)	20/07/1993	24/03/2016	24/03/2016	
75.	Mr. Imran Ali Shah	BS (CS)	14/02/1994	24/03/2016	24/03/2016	
76.	Mr. Saud Al Faisal	BS (EE)	05/02/1987	28/03/2016	28/03/2016	
77.	Syed Norman Ali Shah	BS (CS)	07/11/1992	13/06/2016	13/06/2016	
78.	Mr. Afrasiab Khan	BS (CS)	26/12/1988	29/04/2019	29/04/2019	
79.	Mr. Salman Khan	BS (CS)	02/08/1992	16/12/2020	16/12/2020	
80.	Mr. Muhammad Ashraf	Bs(EE)	15/09/1991	16/12/2020	17/12/2020	
Tentative						
81.	Mr. Irfan Ullah	MS, DIT	10/12/1994	06/09/2022	06/09/2022	
82.	Mr. Rafi Ullah	MS, DIT	15/05/1995	06/09/2022	06/09/2022	
83.	Mr. Inam Uddin	BS, DIT	05/03/1995	06/09/2022	06/09/2022	
84.	Mr. Shafi Ullah	BS(CS)	10/03/1997	06/09/2022	06/09/2022	
85.	Mr. Umar Mansoor Khan	BS(CS)	04/02/1999	06/09/2022	06/09/2022	
86.	Mr. Atta Ur Rhman	B.A, DIT	12/12/1990	15/01/2016	06/09/2022	

DEPUTY COMMISSIONER,
SWAT.

No. 10459-66 /13/DC/Estt.

Copy forwarded to:-

Malakand Division

@commissionerink

PH/408

OFFICE OF THE
COMMISSIONER MALAKAND DIVISION
SAIDU SHARIF SWAT

No. 279-80 /2/28/Estt.:

Dated: 18/01/2023

To The Deputy Commissioner, Swat.

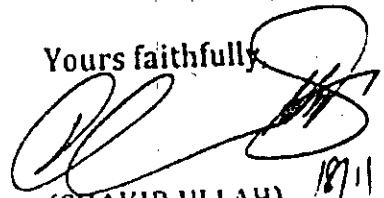
Subject:- TENTATIVE SENIORITY LIST OF COMPUTER OPERATOR AS STOOD ON 31.12.2021.

Dear Sir,

I am directed to refer to your letters No.4958/6/DC/Estt., dated 15/11/2022. on the above noted subject.

I am further directed to convey to decide the subject case in accordance with bid down procedure /rules please.

Yours faithfully,



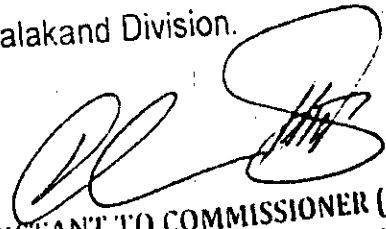
(SHAKIR ULLAH)

18/1/23

ASSISTANT TO COMMISSIONER (REV/GEN)
MALAKAND DIVISION. T

Inst:No & Date Even.

Copy forwarded to PS to Commissioner Malakand Division.



ASSISTANT TO COMMISSIONER (REV/GEN)
MALAKAND DIVISION. T

18/1/23

The Deputy Commissioner,
Swat.

PA# (41)

Subject: **REVIEW PETITION AGAINST SENIORITY LIST NO.
13/DC/ESTT/10481 ISSUED ON 04.01.223**

Respected Sir,

Humbly submitted as under:

1. That I was appointed by the then Departmental Selection / Departmental Promotion Committee Swat vide the then District Coordination Officer / District Magistrate Swat order No. 8574/DCCO/Estt. Dated 27.04.2010 as KPO (Key Punch Operator) later on upgraded to Computer Operator.
2. That I had obtained 2nd position in merit list
3. That as I came to know vide Tentative Seniority list that I was placed at Serial No. 41 instead of serial No. 9, therefore I submitted my objection timely to avoid any irreparable loss to my career.
4. A committee was constituted by your good-self and after a long process the committee turned our objection genuine and the file had to move forward for rectification of my seniority but unfortunately the said was forwarded to Commissioner Mulakand Division instead of decision.
5. Later on, on November 15, 2022 I, ^{and} along with Mr. Qaisar Khan Computer operator submitted an application for urgent disposal of our case and you kind good-self marked the same for inquiry.
6. Surprisingly through a social media group I came to know that final seniority has been issued by and decision of the committee has totally been ignored which is against the law / rules / norms of justice.
7. It is worth mentioning that I came to know today through a reliable sources that the same case has once been decided and seniority list was issued as per merit list and the file remained there pending while wrong file just kept on.

Keeping all the above facts, it is very humbly prayed that the current final seniority list totally against the rules / law / norms of justice therefore may be set aside and the same may be decided as per merit list.

I shall be thankful and shall be praying for you.

Received By

Dispatcher,
DC Office Swat 01
2/11/23

Yours faithfully
Imam Ullah Khan
13/01/2023

70553			
ایڈویٹ: عمار فاروقی صاحب	پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: BC-10-2386			
رابطہ نمبر: 03332362446			

بعدالت جناب: سید زین العابدین صاحب پختونخواہ منیجر پشاور

دعویٰ: سید زین العابدین	منجانب: امیر ایس
علت نمبر:	المنام: المنام
مورخہ:	بنام
جرم:	صوبہ خیبر پختونخواہ
تھانہ:	

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ سے
 آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف 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
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی 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 اختیار 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

المقوم: PESHAWAR BAR ASSOCIATION
 KHYBER PAKHTUNKHWA

المقام: سید زین العابدین صاحب کے لیے منظور ہے۔
 Accepted
 Umar Farooq Badshah
 Muhammad Latif
 Advocates High Courts

المنام: امیر ایس