

10th April, 2023

Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

During course of arguments, learned counsel for the appellant produced copy of office order bearing No. 177-E/233/CEC/C&WD dated 05.12.2022 whereby the appellant was promoted but with immediate effect. In the promotion order produced by learned counsel for the appellant three more persons were placed senior in the promotion order namely Fayaz Muhammad, Muhammad Nasir and Fayaz Khan. Learned counsel for the appellant requested that let the department be directed to produce copy of seniority list on the basis of which promotion order dated 05.12.2022 was made in order to further proceed with the matter. Order accordingly. To come up on 12.05.2023 before D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)
Member (E)

(Kalim Arshad Khan)
Chairman

SCANNED
KPST
Peshawar


07.11.2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate for the respondents present.

SCANNED
KPST
Peshawar

Former requested for adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 03.01.2023 before the D.B.


(Fareeha Paul)
Member (E)

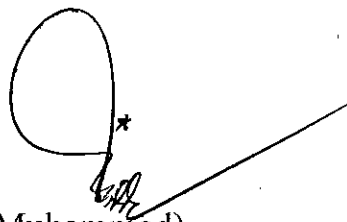

(Rozina Rehman)
Member (J)

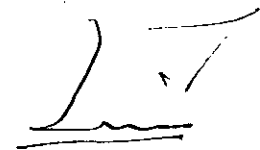
03.01.2023

Appellant alongwith his counsel present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 10.04.2023 before the D.B.

SCANNED
KPST
Peshawar


(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)

17th June 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Fazle Qadir, for the respondents present.

Learned AAG seeks time for submission of written reply/comments. Last chance is given. To come up for written reply/comments on 31.08.2022 before S.B.

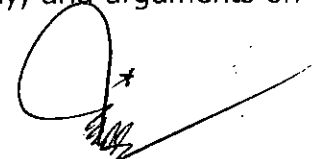


(Kalim Arshad Khan)
Chairman

31.08.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Habib Ur Rehman, Admin Officer for the respondents present.

Reply/comments on behalf of respondents submitted which are placed on file. Copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, and arguments on 07.11.2022 before D.B.



(Mian Muhammad)
Member (E)

04.04.2022

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant at the outset of his arguments stated that the appellant was appointed in the respondent-department as Chowkidar on 22.09.2010. In the year 2021, several posts of Junior Clerks were laying vacant for promotion under 33% quota 35 posts fall in cadre of Class-IV employees for promotion (who had SSC certificate) to the post of Junior Clerk. The respondent-department circulated seniority list of Class-IV employees whereby name of the appellant shown at serial No. 38 on 17.08.2021. He further contended that employees at serial No. 1 and 2 have forgone promotion while the case at serial No.4 was dropped having no SSC certificate, therefore, the appellant became entitled for the said promotion. The respondent-department issued impugned promotion order dated 03.09.2021 wherein 34 colleagues of the appellant have been promoted to the post of Junior Clerk (BS-11) while the appellant has been ignored. Feeling aggrieved, the appellant submitted departmental appeal on 23.09.2021 which was not responded to within statutory period, hence, the instant service appeal instituted invoking jurisdiction of the Service Tribunal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal, Act, 1974.

The appeal is admitted to regular hearing subject to all just legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 17.06.2022 before S.B.



(Mian Muhammad)
Member(E)

Rs-500/-
Appellant Deposited
Security & Process Fee

A. J. J. J.
04/04/22

SCANNED
KPST
Peshawar



Noted for
17/6/2022.
M. J. J. J.
26/5/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 191/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/02/2022 SCANNED KFST PESHAWAR	<p>The appeal of Mr. Muhammad Yousaf presented today by Mr. Mir Zaman Safi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>04-04-2022</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 190 /2022

MUHAMMAD YOUSAF

VS


C&W DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1-3.
2	Affidavit	4.
3	Order dated 03.06.2021	A	5-9.
4	Reminder	B	10-11.
5	Seniority list	C	12-16.
6	Application	D	17-18.
7	Impugned Order	E	19-21.
8	Departmental appeal	F	22.
9	Wakalat nama	23.

APPELLANT

THROUGH:


MIR ZAMAN SAFI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO. 191 /2022

Mr. Muhammad Yousaf, Chowkidar,
O/O Executive Engineer Highway Division-I, Peshawar.

.....APPELLANT

VERSUS

- 1- The Secretary to Govt. of Khyber Pakhtunkhwa C&W Department, Peshawar.
- 2- The Chief Engineer (Centre) C&W Department, Khyber Pakhtunkhwa.
- 3- The Executive Engineer Highway Division-I, Peshawar.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 03.09.2021 WHEREBY COLLEAGUES OF THE APPELLANT HAVE BEEN PROMOTED TO THE POST OF JUNIOR CLERK (BPS-11) WHILE THE APPELLANT HAS BEEN IGNORED INSPITE OF HAVING SENIORITY AND ELIGIBILITY AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER

That on acceptance of this appeal the impugned order dated 03.09.2021 may very kindly be modified to the extent of promotion of appellant to the post of Junior Clerk (BPS-11) with effect from the date when other colleagues of appellant have been promoted i.e. 03.09.2021 with all consequential benefits. Any other relief which this august Tribunal deems appropriate may also be granted in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That the appellant was appointed in the respondent department as Chowkidar on 22-9-2010 and right from the date of appointment the appellant is performing his duty against the said post quite efficiently and up to the entire satisfaction of his superiors.
- 2- That in the year 2021 several posts of junior clerks were lying vacant for promotion in the respondent department and under 33% quota 35 posts fall

in cadre of class-iv employees for promotion to the post of Junior Clerk (BPS-11). That the respondent Department called educational testimonials alongwith other required documents from the eligible class-iv employees vide letter/order dated 03.06.2021 and subsequently issued reminder regarding submission of documents vide dated 23-06-2021. Copies of the letter dated 03.06.2021 and reminder dated 23.06.2021 are attached as annexure..... **A & B.**

3- That it is pertinent to mention that the respondent department also circulated seniority list of class-iv employees vide dated 17.08.2021 whereby name of the appellant enlisted at serial No.38. Copy of the seniority list is attached as annexure.....**C.**

4- That it is also pertinent to mention here that the class-iv employees enlisted at serial No. 1 & 2 of the seniority list forgone their promotions to the post of junior clerk while the employee at serial No.4 namely (Mr. Sajjad Ahmad) differed from the said promotion due to not having the requisite qualification and as such he has also been submitted application for no objection on his deferment. Copy of the application is attached as annexure.....**D.**

5- That after forgoing and not eligibility of the candidates mentioned above for promotion to the post of junior clerk (BPS-11) the appellant became entitle for the said promotion i.e. to the post junior clerk (BPS-11) and the appellant has already been submitted his documents before the Departmental Promotion Committee.

6- That astonishingly the respondent department issued impugned promotion order dated 03.09.2021 whereby 34 colleagues of the appellant have been promoted to the post of junior clerk (BPS-11) while the appellant has been ignored inspite of having eligibility and seniority for the said promotion. Copy of the impugned order is attached as annexure.....**E.**

7- That the appellant feeling aggrieved from the impugned order dated 03-09-2021 preferred departmental appeal before the respondent No.1 but no reply has been received so far. Copy of the departmental appeal is attached annexure**F.**

8- That the appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

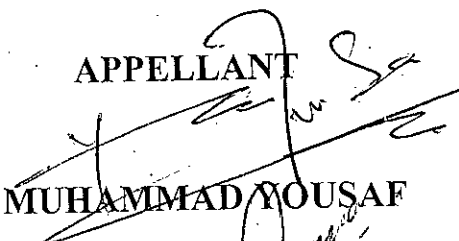
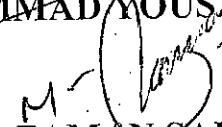
GROUND:

A- That the impugned notification dated 03-09-2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan-1973.
- C- That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 03-09-2021 by promoting colleagues of the appellant to the post of junior clerk (BPS-11) while ignoring the appellant from the same benefit of promotion, therefore, the impugned order dated 03.09.2021 is discriminatory in the eyes of law and the same is liable to be modified/rectified.
- D- That it is pertinent to mention here that as per seniority list the appellant is fully entitle for promotion to the post of Junior Clerk (BPS-11) but the respondent Department on the basis of malafide intention has not been promoted the appellant.
- E- That the appellant has served the Department for a long period with unblemished service record and having seniority cum fitness, therefore, the appellant has the due right to be promoted to the post of Junior Clerk (BPS-11).
- F- That the impugned order dated 03.09.2021 is violative of section-9 of the Civil Servant Act, 1973 read with Rule-7(3) of Khyber Pakhtunkhwa Civil Servant Appointment, Promotion & Transfer Rule, 1989.
- G- That the impugned order dated 03.09.2021 is against the principle of natural justice, hence not tenable and liable to be modified/rectified to the extent of promotion of the appellant.
- H- That the impugned order dated 03.09.2021 is also violative of the Article-38(e) of the Constitution of Islamic Republic of Pakistan, 1973.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for.

Dated: 14.02.2022.

APPELLANT

MUHAMMAD YOUSAF
THROUGH:

MIR ZAMAN SAFI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2022

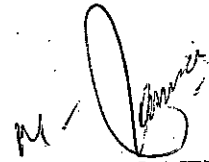
MUHAMMAD YOUSAF

VS

C&W DEPTT:

AFFIDAVIT

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



MIR ZAMAN SAFI,
Advocate
High Court, Peshawar

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 80-E / 2173 / CEC / C&WD

Dated Peshawar the 03 / 06 / 2021

To

1.	The XEN HW Division Bajaur	18.	The XEN Highway Division Peshawar
2.	The XEN C&W Division Chitral	19.	The XEN Mega Project-II Peshawar
3.	The CE (CDO) C&WD Peshawar	20.	The PCA C&WD Peshawar
4.	The XEN C&W Division Kohat	21.	The ARO RR&MT Lab Kohat
5.	The SE C&W Circle Peshawar	22.	The SE C&W Circle Mardan
6.	The SE C&W Circle Dir Lower	23.	The ARO RR&MT Lab Peshawar
7.	The XEN C&W Division Dir Lower	24.	The XEN C&W Division Charsadda
8.	The XEN Building-I Division Peshawar	25.	The XEN Highway Division Charsadda
9.	The XEN Building Division Kurram	26.	The CE (Mega Project) C&WD Peshawar
10.	The XEN C&W Division Haripur	27.	The XEN Mega Project-II Peshawar
11.	The SE C&W Circle Kohat	28.	The XEN C&W Division Mansehra
12.	The XEN C&W Division Kohat	29.	The SE C&W Circle Battagram at Mansehra
13.	The SE C&W Circle Dikhan	30.	The XEN C&W Division Dir Upper
14.	The XEN Highway Division Khyber	31.	The XEN C&W Division Swabi
15.	The SE Mega Projects Peshawar	32.	The XEN C&W Division Buner
16.	The CE (East) C&WD Abbottabad	32.	The Maintenance-I Peshawar
17.	The CE (North) C&WD Swat	33.	The SE Mega Projects Mardan

Subject: - PROVISION OF SERVICE DOCUMENTS

I am directed to refer to the subject noted above and to state that in order to ascertain the factual position you are requested to provide the service documents (in original alongwith attested photocopies) in respect of the following Class-IV working under your respective offices within three (03) days.

Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
1.	Mumtaz Khan	Chowkidar	XEN H/W Division Bajaur	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
2.	Sajjad Ahmad	Naib Qasid	XEN C&W Division Chitral	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
3.	Abidur Rehman	Chowkidar	XEN C&W Division Chitral	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
4.	Zahoor Ahmad	Chowkidar	CE (CDO) C&WD Peshawar	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
5.	Shafi ur Rehman	Chowkidar	XEN C&W Division Kohat	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
6.	Ghareeb Jan	Chowkidar	SE C&W Circle Peshawar	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
7.	Shahzad Gul	Naib Qasid	SE C&W Circle Dir Lower	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
8.	Shah Munir		XEN C&W Division Dir Lower	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
	S. Mehmood Ahmad	Naib Qasid	XEN Building-I Division Peshawar	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate

ATTESTED

569/E-3-d,
07/6/2021

6

Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
10.	Muzahir Hussain	Daftari	XEN Building Division Kurram	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
11.	Muhammad Saeed Khan		XEN C&W Division Haripur	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
12.	Khurshid Iqbal	Naib Qasid	XEN C&W Division Haripur	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
13.	Syed Nadeem Abbas	Chowkidar	SE C&W Circle Kohat	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
14.	Saqib Saleem	Chowkidar	XEN C&W Division Kohat	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
15.	Mukaram Shah	Naib Qasid	XEN C&W Division Kohat	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
16.	Muhammad Pervez		SE C&W Circle DIKhan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
17.	Shahid Ahmad	Naib Qasid	XEN Highway Division Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
18.	Javed	Naib Qasid	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
19.	Waheed Ahmad	Daftari	XEN Mega Project-II Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
20.	Zafar Iqbal	Daftari	PCA Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
21.	Muhammad Naeem	Chowkidar	SE C&W Circle Dir Lower	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
22.	Adnan Afridi		XEN Highway Division Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
23.	Muhammad Yousaf	Chowkidar	XEN Highway Division Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
24.	Alauddin	Chowkidar	XEN C&W Division Chitral	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
25.	Ainaz Ali	Chowkidar	RR&MT Lab Kohat	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
26.	Shah Faisal	Naib Qasid	PCA Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
27.	Abdul Wahab		SE C&W Circle Mardan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
28.	Muhammad Abbas	Naib Qasid	PCA Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
29.	Tahir Ali	Naib Qasid	SE C&W Circle Mardan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
30.	Khalid Hameed	Naib Qasid	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate

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Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
31.	Muhammad Arif	Naib Qasid	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
32.	Asif Khan	Naib Qasid	RR&MT Lab Peshawar	i. Service Book in original. ii. SSC in original. iii. Performance certificate iv. Non-involvement certificate
33.	Samiullah	Naib Qasid	SE C&W Circle Dikhan	i. Service Book in original. ii. SSC in original. iii. Performance certificate iv. Non-involvement certificate
34.	Ihsanullah	Naib Qasid	XEN C&W Division Chitral	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
35.	Liaqat Ali	Naib Qasid	RR&MT Lab Peshawar	i. Service Book in original. ii. SSC in original. iii. Performance certificate iv. Non-involvement certificate
36.	Alamzeb	Naib Qasid	XEN C&W Division Charsadda	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
37.	Wajid Ali	Naib Qasid	XEN Highway Division Charsadda	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
38.	Shaukat Hayat	Daftari	CE (Mega Project) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
39.	Muhammad Nadeem Jamal	Naib Qasid	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
40.	Siddique Ahmad	Daftari	XEN C&W Division Charsadda	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
41.	Zard Ali	Naib Qasid	XEN Mega Project-II Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
42.	Hameed Khan	Daftari	XEN C&W Division Charsadda	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
43.	Amir Tahir	Chowkidar	XEN C&W division Mansehra	i. Service Book in original ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
45.	Amir Shahbaz		SE C&W Circle Battagram at Mansehra	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
46.	Syed Irfan Shah	Chowkidar	SE C&W Circle Battagram at Mansehra	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
47.	Junaid		SE C&W Circle Battagram at Mansehra	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
48.	Saqib Waseem		SE C&W Circle Battagram at Mansehra	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
49.	Bashir Ahmad		XEN C&W Division Dir Upper	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
50.	Muhammad Kamal	Chowkidar	RR&MT Lab Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
51.	Saifur Rehman Khan		XEN C&W Division Dir Upper	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
52.	Rehmanuddin		XEN Highway Division Khyber	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate

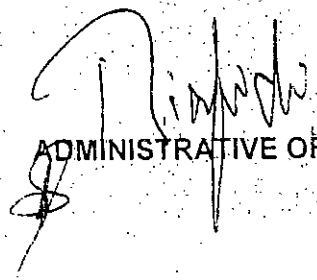
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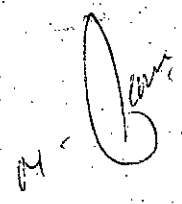
M. B.

Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
53.	Sohail Ahmad	Chowkidar	XEN C&W Division Swabi	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
54.	Ahmad Faraz	Naib Qasid	CE (Centre) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
55.	Sadiqur Rehman	Naib Qasid	CE (Centre) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
56.	Arvez Khan	Naib Qasid	CE (Centre) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
57.	Nasir Khan	Naib Qasid	CE (Centre) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
58.	Aftab Amin	Naib Qasid	CE (Centre) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
59.	Alamgir Khan	Daftari	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
60.	Parvaiz Khan	Daftari	XEN Building Division No.1 Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
61.	Irfanullah	Naib Qasid	SE Mega Projects Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
62.	Imran		SE C&W Circle Battagram at Mansehra	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
63.	Maian Gul Jan	Naib Qasid	XEN C&W Division Buner	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
64.	Nabeen Khan	Naib Qasid	XEN C&W Division Buner	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
65.	Tahir Shah	Chowkidar	XEN C&W Division Buner	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
66.	Muhammad Ayaz	Naib Qasid	XEN Highway Division Khyber	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
67.	Muhammad Fayaz	Naib Qasid	XEN Mega Project-II Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
68.	Muhammad Fiaz	Naib Qasid	CE (East) C&WD Abbottabad	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
69.	Shujat Ali	Chowkidar	XEN Maintenance Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
70.	Tariq Nawaz	Chowkidar	SE C&W Circle Battagram at Mansehra	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
71.	Muhamamad Amin	Naib Qasid	XEN Mega Project (South-II) Dikhan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
72.	Juma Gul	Naib Qasid	CE (North) C&WD Swat	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
73.	Hamid Ullah	Daftari	XEN C&W Division Mardan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate

M - [Signature]

Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
74.	Noor Wahid Jan	Daftari	XEN Highway Division Charsadda	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
75.	Adnan Khan	Daftari	CE (Centre) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
76.	Syed Zubair Ali	Naib Qasid	SE Mega Projects Mardan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
77.	Qadeer Ahmad	Daftari	PCA C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
78.	Muhammad Ilyas	Naib Qasid	XEN C&W Division Mardan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
79.	Munif Khan	Daftari	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
80.	Amjad Khan		XEN Mega Project-I Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate


ADMINISTRATIVE OFFICER



REMINDER 1ST
MOST IMMEDIATE

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 80-E / 2359 / CEC / C&WD

Dated Peshawar the 23 / 06 / 2021

To

- 1) The Chief Engineer (CDO)
C&W Department Peshawar
- 2) The Superintending Engineer
Mega Project Circle Peshawar
- 3) The Principal Consulting Architect
C&W Department Peshawar
- 4) The Executive Engineers
 - i. C&W Division Chitral
 - ii. Building Division-I Peshawar
 - iii. Building Division Kurram
 - iv. C&W Division Dir Upper
 - v. C&W Division Swabi
 - vi. Highway Division Khyber
 - vii. Highway Division Bannu
 - viii. Building Division Charsadda
 - ix. Building Division Mardan

B-10

Subject: **PROVISION OF SERVICE DOCUMENTS**

I am directed to refer to the subject noted above and to invite your attention to this office memo No.80-E/2173/CEC/C&WD dated 03/06/2021, whereby you were requested to provide the service documents (in original alongwith attested photocopies) in respect of the following Class-IV working under your respective offices within three (03) days, but the same is still awaited.

Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
1.	Sajjad Ahmad	Naib Qasid	XEN C&W Division Chitral	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
2.	Abidur Rehman	Chowkidar	XEN C&W Division Chitral	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
3.	Zahoor Ahmad	Chowkidar	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
4.	S. Mehmood Ahmad	Naib Qasid	XEN Building-I Division Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
5.	Muzahir Hussain	Daftari	XEN Building Division Kurram	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
6.	Alauddin	Chowkidar	XEN C&W Division Chitral	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
7.	Ihsanullah	Naib Qasid	XEN C&W Division Chitral	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
8.	Saifur Rehman Khan		XEN C&W Division Dir Upper	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
9.	Rahmanuddin		XEN Highway Division Khyber	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate

Signature	Initials
CE CDO C&W Dept: Pesh:	
Principal Engr: (Hwy)	
S.E. (HQ)	
Principal Engr (Buildings)	
Admn. Officer/ S&A Officer	
Dated	

ATTESTED

CE CDO C&W Dept: Peshawar	
Daily No	651/E-3 J,
Date	29/6/2021

F - (13)

To,

The Chief Executive Officer,
PESCO H/Q, Peshawar.

Subject: GRIEVANCE NOTICE AGAINST THE IMPUGNED ORDER
DATED 27.01.2007 WHEREBY THE APPLICANT HAS BEEN
REMOVED FROM SERVICE

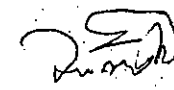
Respected Sir,

It is, most humbly stated that, the applicant was initially inducted/appointed in your good self-Company as Assistant Lineman vide office order No. 8238-41 dated 05.11.1983 and right from appointment the applicant served the Company quite efficiently and upto the entire satisfaction of his superiors. That during service the applicant was falsely implicated in FIR No. 33, dated 27.01.2006, Under Section 302/324//452/427/148/149 PPC read with Section 03 & 04 of the Explosive Act, registered at Police Station Badhber, Peshawar. That initially the applicant was escaped to prove himself as innocent, however later on the applicant submitted his arrest before the local police. That it is pertinent to mention that from the date of arrest the applicant was behind the bar due to which the applicant was unable to perform his duty. That on the basis of the above mentioned reasons the applicant was marked absence from his duty and vide order No. 916-21 dated 27.01.2007 the applicant was removed from his service without issuing any absence notice against the applicant. That before issuing the impugned order dated 27.01.2007 no chance of personal hearing has been provided to the applicant, which is mandatory as per judgment of the Superior Court. That after release on bail the applicant time and again visited the concerned quarter for joining of his duty but in vain. That the applicant has more than 22 years long service in your good self-Company but despite that the applicant awarded with a harsh punishment of removal from service. That the applicant feeling aggrieved from the impugned order dated 27.01.2007 preferred the instant grievance notice before your good self for re-instatement into service with all back benefits.

It is, therefore, most humbly requested that on acceptance of this grievance notice the applicant may very kindly be re-instated into service with all back benefits. Any other relief which your good self deems fit that may also be awarded in favor of the applicant.

Dated: 24.01.2022.

ATTESTED

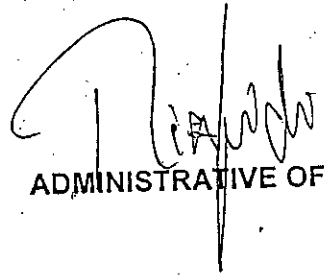


Yours obediently

ZAR MUHAMMAD
Ex- LM-II Cant Division,

11

Sl. No.	Name of official	Designation	Present place of posting	Remarks/ short comings
10.	Sohail Ahmad	Chowkidar	XEN C&W Division Swabi	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
11.	Alamgir Khan	Daftari	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
12.	Parvaiz Khan	Daftari	XEN Building Division No.1 Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
13.	Irfanullah	Naib Qasid	SE PBC Peshawar (now SE Mega Project Peshawar)	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
14.	Muhammad Ayaz	Naib Qasid	XEN Highway Division Khyber	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
15.	Muhammad Amin	Naib Qasid	XEN Highway Division Bannu	i. Service Book in original. ii. SSC in original. iii. Performance certificate iv. Non-involvement certificate
16.	Juma Gul	Naib Qasid	XEN Building Division Charsadda	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
17.	Hamidullah	Daftari	XEN C&W Division Mardan	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
18.	Qadeer Ahmad	Naib Qasid	PCA C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate
19.	Munif Khan	Daftari	CE (CDO) C&WD Peshawar	i. Service Book in original. ii. SSC in original iii. Performance certificate iv. Non-involvement certificate

I am once again directed to request you to provide the same without any further delay, so as to update the seniority list as per their Service Books, failing which this office will convene DPC meeting on the existing seniority list for which this office will not accept any responsibility if any error/ deficiency pointed out subsequently.


ADMINISTRATIVE OFFICER

ATTACHED
u- B

D-10

PESHAWAR ELECTRIC SUPPLY COMPANY LIMITED.

No. 916-21

Dated. 27/01/2007.

OFFICE ORDER.

READ.

1. Mr. Zar Muhammad LM-II was reported absent from duty w 28-01-2006 and involved in a murder case (FER No. 37/33 27-01-2006 lodged in Badkber Police Station Peshawar) A.M.O. PESCO P/Cantt letter No. 131 dated 28-01-2006.
2. He was served with a notice No. 150-51 dt. 01-02-2006 a home address, directing him to resume duty, otherwise d -linary action under removal from service (Special Power Ordinance-2000) will be taken against him.
3. Again he was informed through AMO P/Cantt notice No. 2 dt. 11-02-2006, advising him to attend his office, but there was no response from his side.
4. He was also directed vide EMO PESCO P/Cantt notice No 1704-06 dt. 18-02-2006, asking him to attend his office justify his absence w.e.f. 28-01-2006, but failed to comply with the orders.
5. Show Cause Notice alongwith statement of allegations served upon the official at his home address under Re A.D. vide EMO PESCO P/Cantt letters No. 4392 and 4393 dt 27-04-2006, directing him to attend this office within 3 days, but he did not avail this opportunity.
6. Absentee notice was published in the "Daily Mashriq Post and Daily Frontier Post Peshawar" dated 14-09-2006, directing him to attend his office within 07-days, otherwise disciplinary action under removal from service (Special Power Ordinance-2000) will be taken against him.
7. Final Show Cause Notice was served upon the official home address under Registered AD, Mx vide EMO PESCO P No. 12447 dt. 28-11-2006, directing him to attend this office but again he did not avail this final opportunity too.
8. Wapda publication notice was published in WAPDA Weekly "Khabarnama" from the period (01-12-2006 to 15-12-2006 part 30. S.No. 45-46.
9. Inquiry committee was constituted vide EMO PESCO P/Ca office order No. 13060-62 dt. 18-12-2006.
10. Inquiry Committee reported his willful absence & liable for disciplinary action under removal from Service (Special Power Ordinance-2000) vide AMO PESCO P/Cantt No. 2870-7 dt. 26-12-2006.

ORDERS. In exercise of the powers conferred under removal from service (Special Power Ordinance-2000) and in consideration of the above correspondence and conclusive facts on records, the undersigned being the competent authority has decided as under:

Mr. Zar Muhammad LM-II of P/Cantt S/Divn: is hereby removed from service on account of his willful absence from duty w.e.f. 28-01-2006 F/Noon.

(FAIZ-UL-ISLAM)

By: Manager Operation (PE)
Cantt Divn: Peshawar

- Copy to:-
01. Chief Executive PESCO Peshawar for information please.
 02. Manager Operation PESCO P/C Peshawar for information please.
 03. Finance Director PESCO Peshawar for information please.
 04. All EMOs PESCO in P/Circle, Peshawar for information.
 05. B.A.O. PESCO P/Cantt for information.
 06. Mr. Zar Muhammad LM-II, Village Badkber Moh. Daghun Khail Peshawar for information.

(FAIZ-UL-ISLAM)

ATTESTED

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C-12



OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR
No. 80-E / 79 / CE / C&WD
Dated Peshawar the 17 / 08 / 2021

REVISED FINAL SENIORITY LIST

In pusuance to-Section 8 (1) and (5) of the Khyber Pakhtunkhwa Civil Servants Acts 1973, read with C&W Department (Recruitment/Appointment) Rules 2010 notified vide No. 50E/C&WD/8-12/2009 dated 25/03/2010. The Revised Final Seniority List of Daftaries/Record Lifters/Naib Qasids/Chowkidar's of the C&W Department (Attached Level) (as stood on 16/08/2021) is hereby

Notified as under:-

Note: Seniority is fixed keeping in view the date of appointment and date of acquiring S.S.C, which ever is later.

1	2	3	4	5	6	7	8	9
SL. No	Name with Designation	Father Name	Domicile	D.O.Birth	Date of Appointment In C&W	Date of passing Matric with Session	Present place of posting	Remarks
1	S. Nighah Ali Shah (Chowkidar)	S. Sasiri Alam Shah	Chitral	07/08/1981	09/01/2008	Matric (2000)	XEN C&W Division, Chitral	i. Forgone his promotion. Application received vide Executive Engineer C&W Division Chitral No.892/11-E dated 12/11/2018 ii. Verification fo SSC & year of passing is awaited.
2	Shaidur Rehmat (Chowkidar)	Abdul Azim Khan	Chitral	15/01/1984	09/01/2008	Matric (2007)	XEN C&W Division, Chitral	i. Forgone his promotion. Application received vide Executive Engineer C&W Division Chitral No.892/11-E dated 12/11/2018 ii. Verification fo SSC & year of passing is awaited.
3	Mumtaz Khan (Chowkidar)	Muhammad Rasool Khan	Bajour	03/05/1971	01/07/2008	Matric (1989)	XEN H/Way Division Bajour	i. Re-designated on 01/07/2008 ii. Verification fo SSC & year of passing is awaited.
4	Sajjad Ahmad (Naib Qasid)	Nadir Khan	Chitral	27/03/1974	01/09/2008	Matric (1994)	XEN C&W Division Chitral	Original Service Book & SSC not yet provided
5	Abidur Rahman (Chowkidar)	Saimad Gul	Chitral	05/01/1990	01/09/2008	Matric (2006) M.A, D.I.T	XEN C&W Division Chitral	Verification fo SSC & year of passing is awaited.
6	Zahoor Shah (Chowkidar)	Mubbarak Shahi	Charsadda	01/01/1984	11/10/2008	Matric (2008) B.A	O/O Chief Engineer (CDO)	Verification fo SSC & year of passing is awaited.
7	Shafi Urehman (Chowkidar)	Ajar Khan	Kohat	01/01/1973	08/11/2008	Matric (March,1988)	XEN C&W Division Kohat	Verification fo SSC & year of passing is awaited.
8	Ghareeb Jan (Chowkidar)	Wahabi Gul	Charsadda	10/03/1988	24/11/2008	Matric (2005)	Superintending Engineer C&W Circle Peshawar	
9	Shahzad Gul (Naib Qasid)	Main Abdur Rehman	Dir Lower	25/12/1979	10/01/2009	Matric (2000) F.A	Superintending Engineer C&W Circle Dir Lower	
10	Shah Munir (Chowkidar)	Ranra Khan	Dir Lower	25/02/1986	10/01/2009	Matric (2004) F.A	XEN C&W Division Dir Lower	
11	S. Mehmood Ahmad (Naib Qasid)	S. Noor Ahmad Shah	Peshawar	20/04/1979	20/01/2009	Matric (1997)	XEN C&W Building Division -I Peshawar	Verification fo SSC & year of passing is awaited.
12	Muzahir Hussain (Daftari)	Nazir Hussain	Kurram	28/04/1988	14/04/2009	Matric (2007)	XEN Building Division Kurram Agency	Verification fo SSC & year of passing is awaited.
13	Mohammad Saeed Khan	Mohammad Ismail	Haripur	10/02/1972	11/09/2009	Matric (1988)	XEN C&W Division Haripur	

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درجہ اولیٰ ثانویہ 10335 - 10334
حوالہ سپریشن ڈویژن 23-8-08

پیشگی کیس نمٹانے کے لیے
بیتدائی اطلاع رپورٹ جسٹس جیولری
فائل نمبر 19-7-06
تاریخ 19-7-06
وقت 15:00
پلاٹ نمبر 17:00
V-3
P-45

بیتدائی اطلاع رپورٹ جسٹس جیولری
فائل نمبر 19-7-06
وقت 15:00
پلاٹ نمبر 17:00
تاریخ 19-7-06
وقت 15:00

تاریخ و وقت رپورٹ	19-7-06 وقت 15:00
نام و سکونت اطلاع دہندہ مستفید	عبدالمشید انکریٹو ٹرانسپورٹ
محقق کیفیت تحریم امور مخالف حال اگر کسی باغیانہ	13AE-21K-EX-P-148-149-353-324-302-A
جاتے و توجہ فاسد تھانہ سے اور بہت	نزد مکان تحصیل واقع سہ سورت سڑکی
نام و سکونت ملزم	سہ سورت سڑکی غمخیزی 17 لکھ نمبر درج رشتہ نا خانہ
بازاری قبضہ کیس کے متعلق کسی ایک اطلاع دہندہ کے پاس سے دریافت کر لی گئی ہے	سہ سورت سڑکی
تھانہ سے اطلاع کی تاریخ و وقت	سہ سورت سڑکی

بیتدائی اطلاع نیچے درج کردہ اس وقت ایک غمخیزی 17 لکھ نمبر درج رشتہ نا خانہ

540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

ملکی کمر خیمہ خان غمخیزی 17 لکھ نمبر درج رشتہ نا خانہ کی اطلاع دہندہ سے ملنے پر

غمخیزی 17 لکھ نمبر درج رشتہ نا خانہ کی اطلاع دہندہ سے ملنے پر

محمد عرفی خلیل و ملزم نے ملزم کو 18 لکھ نمبر درج رشتہ نا خانہ کی اطلاع دہندہ سے ملنے پر

پیارے ملزم کو 18 لکھ نمبر درج رشتہ نا خانہ کی اطلاع دہندہ سے ملنے پر

ساکن سنگھ نے ملزم کو 18 لکھ نمبر درج رشتہ نا خانہ کی اطلاع دہندہ سے ملنے پر

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

فراد خان 540 ٹرک نمبر دار خان 791 کو منسوخ ہو گیا ہے۔ جس سے 11 فائل نمبر 19-7-06

ATTESTED

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19

Sl. No	Name with Designation	Father Name.	Domicile	D.O.Birth	Date of Appointment in C&W	Date of passing Matric with Session	Present place of posting	Remarks
14	Niaz Muhammad (Naib Qasid)	Mashal Khan	Lakki Marwat	05/01/1980	09/04/2010	Matric (1996)	XEN C&W Division Lakki Marwat	Verification fo SSC & year of passing is awaited.
15	Khurshid Iqbal (Naib Qasid)	Abdul Aziz	Haripur	26-03-1962	12/04/2010	Matric (1983)	XEN C&W Division Haripur	
16	Syed Nadeem Abbas (Naib Qasid)	Syed Mehdi Shah Gul	Kohat	18/01/1979	30/04/2010	Matric (2000)	SE C&W Circle Kohat	
17	Saqib Saleem (Chowkidar)	Salim Nawaz Khattak	Karak	23/06/1990	30/04/2010	Matric (2006) F.A	XEN C&W Division Kohat	
18	Mukaram Shah (Naib Qasid)	Waris Ali	Orakzai	01/04/1991	30/04/2010	Matric (2010)	XEN C&W Division Kohat	
19	Muhammad Pervez (Naib Qasid)	Ghulam Qasim	D.I.Khan	23/03/1983	26/07/2010	Matric (1999)	Superintending Engineer C&W Circle D.I.Khan	
20	Asif Khan (Naib Qasid)	Mohammad Zarif Khan	Peshawar	29/08/1980	29/07/2010	Matric (1996) F.A	RR&MT Labe C&W.Deptt: Peshawar	Verification fo SSC & year of passing is awaited.
21	Shahid Ahmad (Naib Qasid)	Abdur Rashid	Nowshera	01/10/1990	29/07/2010	Matric (2008)	XEN Highway Div Peshawar	
22	Javed (Naib Qasid)	Abdur Rahim	Charsadda	01/01/1967	02/08/2010	Matric (1982)	Chief Engineer (COO)	
23	Waheed Ahmad (Daftari)	Jamshid Khan	Peshawar	16/03/1973	02/08/2010	Matric (1991) B.Com DIT	XEN PBC Division-II Peshawar	
24	Zafar Iqbal (Daftari)	Muhammad Bashir	Charsadda	01/03/1982	02/08/2010	Matric (2000)	Principal Consulting Architect Peshawar	
25	Sami Ulfah (Naib Qasid)	Allah Wasaya	D.I.Khan	10/03/1987	04/08/2010	Matric (2004)	SE Circle D.I.Khan	
26	Muhammad Naeem (Chowkidar)	Muhammad Zahid	Dir Lower	22/02/1982	12/08/2010	Matric (2002) F.A	Superintending Engineer C&W Circle Dir Lower	i. Appointed as Chowkidar In Estb: & Admin Deptt: on 07/09/2006 ii. Placed in surplus pool by E&A Deptt: in DCO Office Dir w.e.f 01/ 07/2010. iii. Adjusted in C&W Deptt: w.e.f 12/08/2010.
27	Ihsan Ullah (Naib Qasid)	Latif Ullah	Chitral	20/01/1986	25/08/2010	Matric (2002) F.A	XEN C&W Division Chitral	Verification fo SSC & year of passing is awaited.
28	Ala Ud Din (Chowkidar)	Muhammad Tahir	Chitral	14/02/1984	25/08/2010	Matric (14-12-2002) sup	XEN C&W Division Chitral	Verification fo SSC & year of passing is awaited:
29	Adnan Afridi (Naib Qasid)	Shah Jehan Afridi	Peshawar	13/07/1979	26/08/2010	Matric (1997)	Executive Engineer Highway Division Peshawar	
30	Bashir Ahmad	Amir Zada	Dir Upper	08/08/1986	01/09/2010	Matric (2002) B.A	Executive Engineer C&W Divison Dir Upper	
31	Ainaz Ali (Chowkidar)	Ali Afzal	Hangu	03/01/1983	17/09/2010	Matric (2003)	RR&MT Laboratory Kohat.	
32	Shah Faisal (Naib Qasid)	Safdar Khan	Mardan	14/02/1989	17/09/2010	Matric (2007) FA	Principal Consulting Architect Peshawar	
33	Abdul Wahab	Feroz Khan	Mardan	04/02/1981	20/09/2010	Matric (1998)	C&W Circle Mardan	

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SL. No	Name with Designation	Father Name	Domicile	D.O.Birth	Date of Appointment In C&W	Date of passing Matric with Session	Present place of posting	Remarks
34	Liaqat Ali (Naib Qasid)	Sakhi Mohammad	Mardan	03/04/1984	20/09/2010	Matric (2009)	RR&MT Labe C&W Deptt: Peshawar	
35	Muhammad Abbas (Naib Qasid)	Muhammad Nisar	Mardan	13/12/1988	20/09/2010	Matric (2008) F.A	Principal Consulting Architect Peshawar	
36	Tahir Ali (Naib Qasid)	Hasan Dad	Mardan	03/03/1991	20/09/2010	Matric (2008) F.A	SE C&W Circle Mardan	
37	Khalid Hameed (Naib Qasid)	Mohammad Aslam	Nowshera	01/03/1978	22/09/2010	Matric (1994)	Chief Engineer (CDO)	
38	Muhammad Yousaf (Chowkidar)	Bashir Khan	Peshawar	02/04/1985	22/09/2010	Matric (2003) B.A	XEN Highway Division, Peshawar.	
39	Muhammad Arif (Naib Qasid)	Islam Gul	Peshawar	15/01/1980	01/10/2010	Matric (1996) F.A	Chief Engineer (Centre)	
40	Muhammad Kamal (Chowkidar)	Fida Muhammad	Peshawar	02/4/1989	04/10/2010	Matric (2007)	RR&MT Labe C&W Deptt: Peshawar	
41	Muhammad Khalid Khan	Nasir Khan	D.I.Khan	24/03/1983	27/10/2010	Matric (1997) F.A 2012	S.E Circle D.I.Khan	
42	Alamzib (Naib Qasid)	Jehan Zeb	Charsadda	11/04/1984	28/10/2010	Matric (2000)	XEN C&W Division Charsadda	
43	Wajid Ali (Naib Qasid)	Bahadar Sher	Charsadda	05/01/1975	01/11/2010	Matric (1995) FA	XEN H/Way Charsadda	
44	Shaukat Hayat (Daftari)	Shah Jehan	Peshawar	17/03/1978	01/11/2010	Matric (1996)	Chief Engineer (North) C&WD Peshawar.	
45	Saif Ur Rehman Khan	Mir Abas Khan	Lakki Marwat	03/03/1981	01/11/2010	Matric (2002)	Executive Engineer C&W Division Dir Upper	Original Service Book & SSC not yet provided
46	Muhammad Nadeem Jamal (Naib Qasid)	Noor Jamal	Peshawar	15/04/1983	01/11/2010	Matric (1999) F.A	Chief Engineer (North) C&WD Peshawar.	
47	Siddique Ahmad (Daftari)	Said Nazir	Charsadda	15/04/1989	01/11/2010	Matric (2006)	XEN C&W Division Charsadda	
48	Zard Ali (Naib Qasid)	Sabz Ali	Charsadda	05/02/1988	03/11/2010	Matric(2004) F.A	XEN PBC-II Peshawar	
49	Hameed Khan (Daftari)	Khan Bahadar	Charsadda	01/02/1987	05/11/2010	Matric(2004) B.A	XEN C&W Division Charsadda	
50	Amir Tahir (Chowkidar)	Ghulam Sarwar	Mansehra	08/01/1980	15/11/2010	Matric (1996)	XEN C&W Division Mansehra	
51	Amir Shahzad (Chowkidar)	Qalandar Khan	Mansehra	28/02/1974	02/12/2010	Matric (1992)	SE C&W Circle Batagram at Mansehra	
52	Syed Irfan Shah (Chowkidar)	Syed Sabir Hussain Shah	Mansehra	11/06/1987	03/12/2010	Matric (2005) F.A	SE C&W Circle Batagram at Mansehra	
53	Junaid (Naib Qasid)	Muhammad Zahoor	Mansehra	15/05/1991	03/12/2010	Matric (2007)	SE C&W Circle Batagram at Mansehra	
54	Saqib Waseem (Daftari)	Shams-ul-Arifeen	Mansehra	20/04/1987	06/12/2010	Matric (2004) M.A	SE C&W Circle Batagram at Mansehra	
55	Rehman-ud Din (Naib Qasid)	Ferdos Khan	Khyber	08/02/1991	10/01/2011	Matric (2007) F.A.	XEN Highway Khyber Agency	Verification fo SSC & year of passing is awaited.

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No. 8238-41

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Mr. Zar Muhammad s/o Faqir Hussain

Sub-
Memo:

EMPLOYMENT UNDER WAPDA

Ref: your application dated _____

or appoint as Mr. Zar Muhammad s/o Faqir Hussain confirmed that he has been selected under the Pakistan Wapda and Power Development Authority on the following terms and condition.

1. (a) Pay at Rs. 490/- PM in the Revised NPS No. 3
(b) House Rent & Other allowances admissible from time to time and under the rule of the Authority
(c) Travelling allowance and leave at such rates as may be prescribed by the Authority from time to time.
(d) Provident fund benefit wef the date of appointment as per Rules of the Authority.
(e) Medical facilities is admissible under the Wapda Medical Attendance Rules as amended from time to time.
2. Probationary period One Year in the first instance. If his work or conduct during his period of probationary found satisfactory the appointing Authority may during that the period of probation has not expired dispense with his service immediately without giving any previous notice to the effect.
3. He will be governed by such condition of Service as the Authority may from time to time prescribe.
4. The Authority may charge his place of Service or appointment designation responsibilities of duties from time to time as it may think fit.
5. He should before reporting for duty produce a certificate of Medical fitness from the Chief Medical officer of Wapda refer his to a special 1st for opinion or if he is required to obtain as X-ray electiracction the cost of s Lucy consultation/servi will be borne by him.
6. He will be required to furnish two character certificates from person of re ute. He will also recurred to furnish a Declaration in writing to the effect that he has not been convicted screened out or otherwise removed from Government Wapda or other Statuory body service or from the Service of any Foreign or local organization/institution/office.
7. He will make a declaration in writing of all moveable and imoveable properties incouding certificate sourst insurance polociies and Jewellery of the vluue of Rs. 1000/- or mor belonging to him or held by him or bg member of his family individually or collectively defined to the West Pakistan Govt Servents conduct. Rules 1966 within ohne Month of his entering in Wapda Service. The member of the family according to the West Pakistan Government Servents (conduct) Rules 1966 or as below.
 1. Wife, Children and parents sisters and minor brothers residing with wholly dependent upon the Govt Service.

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SL. No	Name with Designation	Father Name	Domicile	D.O.Birth	Date of Appointment In C&W	Date of passing Matric with Session	Present place of posting	Remarks
56	Sohail Ahmad (Chowkidar)	Ali Said	Swabi	10/04/1990	11/01/2011	Matric (2010) F.A	XEN C&W Division Swabi.	
57	Ahmad Faraz (Naib Qasid)	Aurangzeb	Peshawar	11/10/1980	17/01/2011	Matric (1995)	Chief Engineer (Centre) C&WD Peshawar.	Verification fo SSC & year of passing is awaited.
58	Arvez Khan (Naib Qasid)	Gul Raiz Khan	Nowshera	25/01/1975	18/01/2011	Matric (1994)	Chief Engineer (Centre) C&WD Peshawar.	
59	Nasir Khan (Naib Qasid)	Muhammad Iqar	Charsadda	10/02/1986	18/01/2011	Matric (2007)	Chief Engineer (Centre) C&WD Peshawar.	Verification fo SSC & year of passing is awaited.
60	Aftab Amin (Naib Qasid)	Mian Khan	Peshawar	02/11/1990	18/01/2011	Matric (2011)	Chief Engineer (Centre) C&WD Peshawar.	Original Service Book & SSC not yet provided
61	Alamgir Khan (Daftari)	Jehangir Khan	Peshawar	01/01/1989	18/01/2011	Matric (2009)	Chief Engineer (CDO) C&WD Peshawar	
62	Saddiq-ur-Rahman (Naib Qasid)	Liaqat Khan	Peshawar	17/09/1992	18/01/2011	Matric (2010) F.A (2013) B.A	Chief Engineer (Centre) C&WD Peshawar.	
63	Paryaz Khan (Daftari)	Said-ur-Rahman	Lakki Marwat	11/09/1976	20/01/2011	Matric (1993) M.A.	XEN Building Division No.1 Peshawar	Original Service Book & SSC not yet provided
64	Irfan Ullah (Naib Qasid)	Rafiq Khan	Lakki Marwat	18/03/1987	22/01/2011	Matric (2004) B.A	SE PBC Peshawar	Original Service Book & SSC not yet provided
65	Imran (Naib Qasid)	Shulam Sarwar	Mansehra	21/03/1986	24/01/2011	Matric (2001)	SE C&W Circle Batagram at Mansehra	Verification fo SSC & year of passing is awaited.
66	Javaid Akber (Chowkidar)	Gul Zaman	D.I.Khan	01/04/1991	01/02/2011	Matric (2007) FA (2012)	XEN C&W Divn: D.I.Khan	Verification fo SSC & year of passing is awaited.
67	Mian Gul Jan (Naib Qasid)	Muhammad Jan	Bunair	15/05/1976	10/03/2011	Matric (1995) B.A	XEN C&W Division Bunair.	
68	Nabeen Khan (Naib Qasid)	Abdur Rahim	Bunair	30/03/1980	10/03/2011	Matric (2006) FA	XEN C&W Division Bunair.	
69	Tahir Shah (Chowkidar)	Sabir Shah	Bunair	01/04/1980	10/03/2011	Matric (1997)	XEN C&W Division Bunair	
70	Muhammad Ayaz (Naib Qasid)	Khitab Gul	Khyber	23/03/1991	01/04/2011	Matric (2009)	XEN Highway FATA Divison Khyber Agency	Verification fo SSC & year of passing is awaited.
71	Muhammad Fayaz (Naib Qasid)	Hakeem Khan	Peshawar	15/01/1983	23/04/2011	Matric (2002) M.A, D.I.T	XEN PBC Division-II Peshawar	
72	Muhammad Fiaz (Naib Qasid)	Muhammad Aslam	Abbottabad	18/09/1976	30/04/2011	Matric (1992)	Chief Engineer (East) Abbottabad	
73	Shujat Ali (Chowkidar)	Sher Ali	Swat	24/04/1978	15/05/2004	Matric (2011) F.A	XEN PBMC C&WD Peshawar	
74	Tariq Nawaz (Chowkidar)	Raj Muhammad	Battagram	30/12/1987	02/06/2011	Matric (2007)	SE Circle Battagram at Mansehra	Verification fo SSC & year of passing is awaited.
75	Muhammad Amin (Naib Qasid)	Sherous	Tank	20/01/1978	02/07/2011	Matric (2000)	XEN C&W Division FR Tank/ D.I Khan	Original Service Book & SSC not yet provided
76	Juma Gul (Naib Qasid)	Fateh Rahman	Charsadda	01/05/1976	11/08/2011	Matric (1994)	Chief Engineer (North) C&WD Peshawar.	Original Service Book & SSC not yet provided

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BEFORE THE PRESIDING OFFICER LABOUR COURT,
PESHAWAR

GRIEVANCE PETITION NO. _____/2022

ZAR MUHAMMAD

VS

CHIEF EXECUTIVE
PESCO & OTHERS

ADDRESSES OF PARTIES

Mr. Zar Muhammad, Ex-Lineman-II,
Office of the XEN (Opr:) PESCO, Cantt: Division, Peshawar.

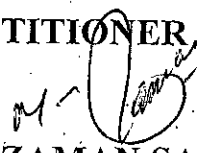
..... PETITIONER

VERSUS

- 1- The Chief Executive Officer, PESCO H/Q, Peshawar.
- 2- The Manager Operation, PESCO, Peshawar Cantt: Peshawar.
- 3- The Deputy Manager Operation, PESCO, Cantt: Division,
Peshawar..... RESPONDENTS

PETITIONER

THROUGH:


MIR ZAMAN SAFI
ADVOCATE

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SL. No	Name with Designation	Father Name	Domicile	D.O. Birth	Date of Appointment in C&W	Date of passing Matric with Session	Present place of posting	Remarks
221	Inam Ul Haq (Naib Qasid)	Muhammad Miraj uddin	Nowshera	07/07/1978	22/11/2019	Matric (1996) F.A 2005	XEN Bldg: Nowshera	i. Appointed as Chowkidar by FATA Secretariat on 24/12/2009. ii. In pursuance of integration & merger of FATA with KPK, placed in surplus pool w.e.f 01/07/2019 vide C&AD No. SO(O&M)/E&AD/3-18/19 dated 25/06/2019. iii. His services placed at the disposal of DC Nowshera vide E&A Deptt: No. SOE-III(E&AD)1-3/2019/Erstwhile FATA dated 19/07/2019 w.e.f 01/07/2019 and reported arrival in DC Office on 23/07/2019. iv. Adjusted as Chowkidar in Bldg: Divn: Nowshera vide DC Nowshera O/O No.958E-93/EA-08/DC/NSR/2019 dated 14/11/2019 & reported arrival on 22/11/2019
222	Kashif Nawaz (Naib Qasid)	Ahmad Nawaz	Malakand	02/02/1993	01/10/2012	Matric (09/12/2019)	XEN C&W Division Malakand	Appointed as Naib Qasid under Medically Invalidated Quota
223	Muhammad Rehan (Naib Qasid)	Muhammad Ramzan	Tank	15/04/1998	06/02/2020	Matric (2014)	XEN Bldg: Div: Tank	
224	Muhammad Naeem Jan	Muhammad Anwar Jan	Dir Lower	14/02/1984	04/03/2020	Matric (2002)	XEN C&W Division Dir Lower	
225	Faran Ahmad	Maqsood Ahmad	Peshawar	16/10/1992	26/12/2011	Matric (07/2020)	XEN Bldg: Div - II Peshawar	
226	Fazal Muhammad (Chowkidar)	Gul Muhammad	Bajaur	01/01/1988	09/01/2013	Matric (07/2020)	XEN Bldg: Div Bajaur	Designated / Adjusted as Chowkidar by XEN Bldg: Bajaur 09/01/2013
227	Bakhtawar Hussain	Ghulam Yaseen	D.I.Khan	04/02/1988	04/11/2020	Matric (2007)	XEN C&W Division D.I.Khan	
228	Asad Khan (Naib Qasid)	Noshad Khan	Peshawar	10/12/1997	20/11/2020	Matric (2013) FSC (2015)	Chief Engineer (M.A)	
229	Zahid Khan (Naib Qasid)	Deedar Muhammad	Peshawar	07/03/1999	11/12/2020	Matric (07/2020)	O/O Chief Engineer (Centre)	

Copy forwarded to:-

- 1) The Secretary to Govt. of Khyber Pakhtunkhwa C&W Department Peshawar.
- 2) All Chief Engineers in C&W Department, Khyber Pakhtunkhwa i/c Merged Areas (Ex-FATA).
- 3) All the Superintending Engineer's in C&W Department Khyber Pakhtunkhwa.
- 4) All the Executive Engineers in C&W Department i/c Merged Areas (Ex-FATA)
- 5) Deputy Director IT C&W Secretariat Peshawar. He is requested to upload the same on C&W official Website.

CHIEF ENGINEER (CENTRE)

ADMINISTRATIVE OFFICER

BEFORE THE PRESIDING OFFICER LABOUR COURT,
PESHAWAR

GRIEVANCE PETITION NO. _____/2022

ZAR MUHAMMAD

VS

CHIEF EXECUTIVE
PESCO & OTHERS

AFFIDAVIT

I, Mir Zaman Safi, Advocate on the instruction and on behalf of my client do hereby solemnly affirm that the contents of this grievance petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


MIR ZAMAN SAFI
ADVOCATE

خدمت خراب آگین صبا سی ایڈیٹڈ ڈیپارٹمنٹ ڈویژن چترال آپر

خواب دلا

D-17

آدیا گزارش ہے کہ ایش میں سلیب آئے توجہ سے فوری سے
کے سامان کو فانی کر کے روک کر جہم ٹینٹ کی تھی اس دوران میرے رشتہ دار
کہیں تم سے ہوتے ہیں۔ جو نام فوری سے پر موشن کے سلسلے میں کما سر ٹیسٹ مانا
جو نام فوری اس وقت نہیں کرتا۔ اس میں کے ٹیے پورڈ سے دربارہ سر ٹیسٹ نکالنا
آمد میں میں وقت لگے گا۔

اس ٹیے درخواست ہے کہ فوری کو مزید وقت دیا جائے تاکہ فوری پرو
ٹیکس کے ائید کے ٹینٹ تک یہ کاغذ پیش کر سکیں۔ اس وقت فوری یہ رستا و سزا نہیں
سے صبح بال و جو ہا کے بنیاد پر قائم ہے۔ موجودہ DPC پر میرا کوئی اعتراض نہیں ہے

درخواست برائے محدود کارروائی پیش خدمت ہے

فقط



Signature

جادو محمد
ناایب قاضی سی ایڈیٹڈ ڈیپارٹمنٹ

CNIC No. 15202-60771195

ڈویژن چترال آپر

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- E- That involvement of the petitioner in criminal case was in the best knowledge of the respondents but on the basis of malafie intention the respondents proceeded the petitioner on absentia and straight away issued the impugned order dated 27.01.2007 without fulfilling the codal formalities, hence the impugned order dated 27.01.2007 is illegal and unlawful.
- F- That the respondents were required to be suspended as per law and rules but the respondents directly removed the service of petitioner vide order dated 27.01.2007.
- G- That no regular inquiry has been conducted by the respondents which necessary as per judgment of the Superior Court, before taking punitive actions against the employees.
- H- That the impugned order dated 27.01.2007 is against the principle "Audi Alteram Partem".
- I- That petitioner seeks permission to advance other grounds and proofs at the time of hearing.

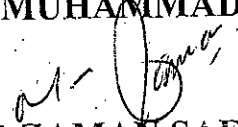
It is, therefore, most humbly prayed that the grievance petition of the petitioner may kindly be accepted as prayed for.

Dated: 15.02.2022.

PETITIONER

ZAR MUHAMMAD

Through:


MIR ZAMAN SAFI
ADVOCATE



OFFICE OF THE EXECUTIVE ENGINEER
COMMUNICATION & WORKS DIVISION
UPPER CHITRAL

PH & Fax 470014 chitralcnwcu@gmail.com

NO. 944 / 17-E dated the 24/8/2021

(8)

The Chief Engineer (Centre)
C&W Department Peshawar.

Subject:- FORGOING ON CURRENT DEPARTMENTAL PROMOTION COMMITTEE FOR
THE YEAR 2021-22.

Enclosed please find herewith an application in original received from Mr. Sajad Ahmad Naib Qasid which self explanatory for further necessary action please.

)/As above

~~Executive Engineer,~~

Copy forwarded to the Superintending Engineer C&W Circle Dir Lower at Timergira for information please.

Executive Engineer,

m-b

and in case FIR No. 507, dated 19.07.2006, under section 302-324-353-148-149/Exp-216/13AO, Police Station Badhber. Copies of the FIRs are attached as annexure.....**B & C.**

- 4- That due to involvement in false criminal cases and life threats the petitioner leave his home alongwith family and shifted to another place for safety of his life. That later on the petitioner was arrested by the police and put him into the prison.
- 5- That after his arrest the petitioner filed bail application before the Session Court, Peshawar and vide order/judgment dated 16.04.2020 the Learned Additional Session Judge, Peshawar the petitioner released on bail. Copy of the order/judgment dated 16.04.2020 is attached as annexure.....**D.**
- 6- That after release from prison the petitioner visited the quarter concerned and made several requests for his re-instatement but the respondents have not been given any response to the repeated requests of petitioner. That the petitioner feeling aggrieved from the impugned order dated 27.01.2007 preferred grievance notice before the respondent No.1 but no response has been given on the same within the statutory period. Copies of the impugned order and grievance notice alongwith acknowledgment is attached as annexure.....**E & F.**
- 7- That the petitioner feeling aggrieved and having no other adequate remedy but to file the instant grievance petition on the following grounds amongst others.

GROUND:

- A- That the impugned order dated 27.01.2007 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the petitioner has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondent acted in arbitrary and malafide manner by issuing the impugned order dated 27.01.2007 which is against the law and prescribed rules, hence not tenable in the eye of law and liable to be set aside.
- D- That the petitioner has more than 22 years' service on his credit but the respondents have been removed the petitioner from service on a single stroke of pen.



OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 177-E/206/CEC/C&WD

Dated Peshawar the 03/09/2021

OFFICE ORDER

On the recommendations of Departmental Promotion Committee in its meeting held on 25/08/2021, the following Class-IV (Daftaries/ Record Lifters/ Naib Qasids & Chowkidars) (having passed Secondary School Examination) have been cleared for promotion to the Cadre post of Junior Clerks (BS-11) in C&W Department on regular basis with immediate effect:-

- 1) Mumtaz Khan (Chowkidar) = As Junior Clerk on Regular basis.
- 2) Abidur Rehman (Chowkidar) = As Junior Clerk on Regular basis.
- 3) Zahoor Shah (Chowkidar) = As Junior Clerk on Regular basis.
- 4) Shafi-Ur-Rehman (Chowkidar) = As Junior Clerk on Regular basis.
- 5) Ghareeb Jan (Chowkidar) = As Junior Clerk on Regular basis.
- 6) Shahzad Gul (Naib Qasid) = As Junior Clerk on Regular basis.
- 7) Shah Munir (Naib Qasid) = As Junior Clerk on Regular basis.
- 8) S. Mehmood Ahmad (Naib Qasid) = As Junior Clerk on Regular basis.
- 9) Muzahir Hussain (Daftari) = As Junior Clerk on Regular basis.
- 10) Muhammad Saeed Khan (Naib Qasid) = As Junior Clerk on Regular basis.
- 11) Niaz Muhammad (Naib Qasid) = As Junior Clerk on Regular basis.
- 12) Khurshid Iqbal (Naib Qasid) = As Junior Clerk on Regular basis.
- 13) Syed Nadeem Abbas (Chowkidar) = As Junior Clerk on Regular basis.
- 14) Saqib Saleem (Chowkidar) = As Junior Clerk on Regular basis.
- 15) Mukaram Shah (Naib Qasid) = As Junior Clerk on Regular basis.
- 16) Muhammad Pervez (Naib Qasid) = As Junior Clerk on Regular basis.
- 17) Asif Khan (Naib Qasid) = As Junior Clerk on Regular basis.
- 18) Shahid Ahmad (Naib Qasid) = As Junior Clerk on Regular basis.
- 19) Javed (Naib Qasid) = As Junior Clerk on Regular basis.
- 20) Waheed Ahmad (Daftari) = As Junior Clerk on Regular basis.
- 21) Zafar Iqbal (Daftari) = As Junior Clerk on Regular basis.
- 22) Sami Ullah (Naib Qasid) = As Junior Clerk on Regular basis.
- 23) Muhammad Naeem (Chowkidar) = As Junior Clerk on Regular basis.
- 24) Ihsan Ullah (Naib Qasid) = As Junior Clerk on Regular basis.
- 25) Allauddin (Chowkidar) = As Junior Clerk on Regular basis.
- 26) Adnan Afridi (Naib Qasid) = As Junior Clerk on Regular basis.
- 27) Bashir Ahmad (Naib Qasid) = As Junior Clerk on Regular basis.
- 28) Ainaz Ali (Chowkidar) = As Junior Clerk on Regular basis.
- 29) Shah Faisal (Naib Qasid) = As Junior Clerk on Regular basis.
- 30) Abdul Wahab (Naib Qasid) = As Junior Clerk on Regular basis.
- 31) Liaqat Ali (Naib Qasid) = As Junior Clerk on Regular basis.
- 32) Muhammad Abbas (Naib Qasid) = As Junior Clerk on Regular basis.
- 33) Tahir Ali (Naib Qasid) = As Junior Clerk on Regular basis.
- 34) Khalid Hameed (Naib Qasid) = As Junior Clerk on Regular basis.

2- On their Regular Promotion as Junior Clerks, they will be on probation for a period of one year in terms of Section-6(2) of Civil Servant Act, 1973 read with Rules-15(1) of the Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3- Consequent upon above promotions as Junior Clerks, the posting/ transfer of the following officials of C&W Department is hereby ordered, in the public interest with immediate effect:-

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
1)	Mr. Mumtaz Khan Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Bajaur	Junior Clerk O/O XEN Building Division Bajaur	Vice Mustafa Kamal transferred.
2)	Abdid-Ur-Rehman Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Lower Chitral	Junior Clerk O/O XEN C&W Division Chitral Upper	Existing Vacancy
3)	Zahoor Shah Junior Clerk (BS-11)	Chowkidar O/O CE (CDO) C&WD Peshawar	Junior Clerk O/O XEN Highway Division Charsadda	Existing Vacancy
4)	Shafi-Ur-Rehman Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division Kohat	Junior Clerk O/O XEN Building Division Kohat	Existing Vacancy

BEFORE THE PRESIDING OFFICER LABOUR COURT
PESHAWAR

GRIEVANCE PETITION NO _____/2022

Mr. Zar Muhammad, Ex-Lineman-II,
Office of the XEN (Opr:) PESCO, Cantt: Division, Peshawar.

..... PETITIONER

VERSUS

- 1- The Chief Executive Officer, PESCO H/Q, Peshawar.
- 2- The Manager Operation, PESCO, Peshawar Cantt: Peshawar.
- 3- The Deputy Manager Operation, PESCO, Cantt: Division, Peshawar..... RESPONDENTS

GRIEVANCE PETITION UNDER SECTION-37 OF THE INDUSTRIAL RELATION ACT, 2010 AGAINST THE IMPUGNED ORDER DATED 27.01.2007 WHEREBY THE PETITIONER HAS BEEN REMOVED FROM SERVICE AND AGAINST NO RESPONSE HAS BEEN GIVEN ON THE GRIEVANCE NOTICE OF THE PETITIONER WITHIN THE STATUTORY PERIOD

PRAYER:

That on acceptance of this grievance petition the impugned order dated 27.01.2007 may very kindly be set aside and the petitioner be re-instated into service with all back benefits or the penalty of removal from service of the petitioner be converted into the compulsory retirement. Any other relief which this august Court deems appropriate may also be awarded in favor of the petitioner.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present grievance petition are as under:-

- 1- That the petitioner was initially inducted in the respondent company as LM-II vide order dated 05.11.1983. That after appointment the petitioner took over the charge against the said post and started performing his duty quite efficiently and upto the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure.....A.
- 2- That the petitioner has served the respondent company for more than 22 years with devotion, honesty and with all zeal and zest.
- 3- That during service the petitioner was falsely charged in a criminal case FIR No. 33, dated 27.01.2006, under section 302-324-148-149/3/4 Exp-Sub Act 452-427, Police Station Badhber

20

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
5)	Ghareeb Jan Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle Peshawar	Junior Clerk O/O CE (South-I) C&WD Peshawar	Existing Vacancy
6)	Shahzad Gul Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle Dir Lower	Junior Clerk O/O CE (North) C&WD Swat	Vice Muhammad Ali transferred.
7)	Shah Munir Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Dir Lower	Junior Clerk O/O XEN Building Division Dir Lower	Existing Vacancy
8)	S. Mehmood Ahmad Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division-I Peshawar	Junior Clerk O/O XEN Building Division-I Peshawar	Existing Vacancy
9)	Muzahir Hussain Junior Clerk (BS-11)	Daftari O/O XEN Building Division Kurram	Junior Clerk O/O XEN Building Division Kurram	Existing Vacancy
10)	Muhammad Saeed Khan Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Haripur	Junior Clerk O/O CE (East) C&WD Abbottabad	Existing Vacancy
11)	Niaz Muhamad Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Lakki Marwat	Junior Clerk O/O XEN C&W Division Lakki Marwat	Existing Vacancy
12)	Khurshid Iqbal Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Haripur	Junior Clerk O/O XEN Building Division Swabi	Existing Vacancy
13)	Syed Nadeem Abbas Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle Kohat	Junior Clerk O/O SE C&W Circle, Hangu.	Existing Vacancy
14)	Saqib Saleem Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Kohat	Junior Clerk O/O XEN Mega Projects Division (South-I) at Kohat.	Existing Vacancy
15)	Mukaram Shah Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Kohat	Junior Clerk O/O XEN Building Division Kohat	Existing Vacancy
16)	Muhammad Pervez Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle DIKhan	Junior Clerk O/O CE (South-II) C&W Department DIKhan	Existing Vacancy
17)	Asif Khan Junior Clerk (BS-11)	Naib Qasid O/O ARO RR&MT Laboratory Peshawar	Junior Clerk O/O XEN Mega Project Division-II Peshawar.	Existing Vacancy
18)	Shahid Ahmad Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Peshawar	Junior Clerk O/O XEN Building Division Buner	Vice Mr. Kamran Javed transferred.
19)	Javed Junior Clerk (BS-11)	Naib Qasid O/O CE (CDO) C&WD Peshawar	Junior Clerk O/O XEN Building Division-II Peshawar.	Existing Vacancy
20)	Waheed Ahmad Junior Clerk (BS-11)	Daftari O/O XEN Mega Project-II Peshawar	Junior Clerk O/O XEN Mega Project Division-I Peshawar	Existing Vacancy
21)	Zafar Iqbal Junior Clerk (BS-11)	Daftari O/O PCA C&WD Peshawar	Junior Clerk O/O XEN Mega Project Division-I Peshawar	Existing Vacancy
22)	Sami Ullah Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle DIKhan	Junior Clerk O/O XEN Mega Project Division DIKhan	Existing Vacancy
23)	Muhammad Naeem Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle Dir Lower	Junior Clerk O/O SE C&W Circle Swat.	Existing Vacancy
24)	Ihsan Ullah Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Chitral	Junior Clerk O/O XEN C&W Division Chitral Upper	Existing Vacancy

ATTESTED

BEFORE THE PRESIDING OFFICER LABOUR COURT,
PESHAWAR

GRIEVANCE PETITION NO. _____/2022

ZAR MUHAMMAD

VS

CHIEF EXECUTIVE
PESCO & OTHERS

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
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7	Bail order/judgment	E	11- 12.
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9	Wakalat nama	14.

PETITIONER

THROUGH:

MIR ZAMAN SAFI
ADVOCATE

21

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
25)	Allauddin Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Chitral	Junior Clerk O/O CE (North) C&W Department Swat.	Existing Vacancy
26)	Adnan Afridi Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Peshawar	Junior Clerk O/O XEN Mega Project Division-I Peshawar.	Existing Vacancy
27)	Bashir Ahmad Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Dir Upper	Junior Clerk O/O CE (North) C&W Department Swat.	Existing Vacancy
28)	Ainaz Ali Junior Clerk (BS-11)	Chowkidar O/O ARO RR&MT Lab Kohat	Junior Clerk O/O SE Mega Project Circle Kohat.	Existing Vacancy
29)	Shah Faisal Junior Clerk (BS-11)	Naib Qasid O/O PCA C&WD Peshawar	Junior Clerk O/O SE C&W Circle Mardan.	Existing Vacancy
30)	Abdul Wahab Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle Mardan	Junior Clerk O/O ARO RR&MT Laboratory Mardan.	Existing Vacancy
31)	Liaqat Ali Junior Clerk (BS-11)	Naib Qasid O/O ARO RR&MT Lab Peshawar	Junior Clerk O/O XEN Highway Division Mardan.	Existing Vacancy
32)	Muhammad Abbas Junior Clerk (BS-11)	Naib Qasid O/O PCA C&WD Peshawar	Junior Clerk O/O XEN Building Division Buner	Vice Hafeez Ahmad transferred.
33)	Tahir Ali Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle Mardan	Junior Clerk O/O XEN Building Division Buner.	Vice Zulqarnain Shah transferred.
34)	Khalid Hameed Junior Clerk (BS-11)	Naib Qasid O/O CE (CDO) C&WD Peshawar	Junior Clerk O/O CE (CDO) C&WD Peshawar	Existing Vacancy

CHIEF ENGINEER (CENTRE)

Copy is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- All Chief Engineers in C&W Department Khyber Pakhtunkhwa.
- 3- Superintending Engineers concerned.
- 4- Executive Engineers concerned.
- 5- Section Officer (Estb) C&W Department Peshawar/ Member DPC.
- 6- Administrative Officer O/O CE (CDO) C&WD Peshawar/ Member DPC.
- 7- District Accounts Officers, concerned.
- 8- Officials concerned.

ATTACHED
M

[Signature]

CHIEF ENGINEER (CENTRE)

F-13

To,

The Chief Executive Officer,
PESCO H/Q, Peshawar.

Subject: GRIEVANCE NOTICE AGAINST THE IMPUGNED ORDER
DATED 27.01.2007 WHEREBY THE APPLICANT HAS BEEN
REMOVED FROM SERVICE

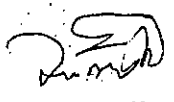
Respected Sir,

It is, most humbly stated that, the applicant was initially inducted/appointed in your good self-Company as Assistant Lineman vide office order No. 8238-41 dated 05.11.1983 and right from appointment the applicant served the Company quite efficiently and upto the entire satisfaction of his superiors. That during service the applicant was falsely implicated in FIR No. 33, dated 27.01.2006, Under Section 302/324//452/427/148/149 PPC read with Section 03 & 04 of the Explosive Act, registered at Police Station Badhber, Peshawar. That initially the applicant was escaped to prove himself as innocent, however later on the applicant submitted his arrest before the local police. That it is pertinent to mention that from the date of arrest the applicant was behind the bar due to which the applicant was unable to perform his duty. That on the basis of the above mentioned reasons the applicant was marked absence from his duty and vide order No. 916-21 dated 27.01.2007 the applicant was removed from his service without issuing any absence notice against the applicant. That before issuing the impugned order dated 27.01.2007 no chance of personal hearing has been provided to the applicant, which is mandatory as per judgment of the Superior Court. That after release on bail the applicant time and again visited the concerned quarter for joining of his duty but in vain. That the applicant has more than 22 years long service in your good self-Company but despite that the applicant awarded with a harsh punishment of removal from service. That the applicant feeling aggrieved from the impugned order dated 27.01.2007 preferred the instant grievance notice before your good self for re-instatement into service with all back benefits.

It is, therefore, most humbly requested that on acceptance of this grievance notice the applicant may very kindly be re-instated into service with all back benefits. Any other relief which your good self deems fit that may also be awarded in favor of the applicant.

Dated: 24.01.2022.

ATTESTED



Yours obediently

ZAR MUHAMMAD
Ex- LM-II Cant Division,

To

The Hon'ble Secretary to Govt. of
Khyber Pakhtunkhwa,
C&W Department Peshawar
(APPELLATE AUTHORITY)

24-5-2021

DYNol-9088

F-02

THROUGH

PROPER CHANNEL

Subject:

APPEAL FOR REGULAR PROMOTION TO THE POST OF JUNIOR CLERK (B-11)

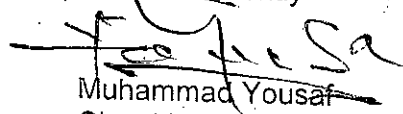
Sir,

It is most humbly submitted :-

- 1) That I am working as Chowkidar in the C&W Department since 2010 and appearing at Sl. No. 38 of the Seniority List of Matriculate Class-IVs.
- 2) That recently the Hon'ble Chief Engineer (Centre) C&WD has issued promotion orders of my colleagues, against the already reserved promotion quota for such cadre to the post of Junior Clerks (B-11).
- 3) That according to the ibid quota, a total 35-No. officials were due for promotion, but the competent authority promoted only 34-Nos. (upto Sl. No.37), resultantly the undersigned was left due to the reason that one official namely Mr. Sajjad Ahmad (From Chitral) was not promoted / deferred on his own request and the post was illegally / unlawfully reserved for him. Hence, it was the appellant, who could have been considered for promotion being next in the Seniority List, but it was not done, which amounts to illegality rather injustice.
- 4) On the other, Two officials at Sl. No. 01 and 02 were also deferred on their own request(s) and accordingly two other individuals (being next in number) were promoted against the said deferred persons in the same promotion order, but the injustice has only done in my case except all the others.
- 5) The above described action is also against the Judgment of Hon'ble Supreme Court of Pakistan in similar nature case (Civil Appeal) bearing No. 316-L of 2009 passed / decided on 21-07-2016, wherein reservation of post for a person (who was deferred from promotion) has been declared as illegal by the August Court (copy of order sheet attached for perusal).

Keeping in view the above explained facts, it is most humbly requested that the undersigned may please be considered for promotion to the cadre post of Junior Clerk (B-11) on regular basis, against the available existing vacancy, on humanitarian & sympathetic grounds and saving me from further financial losses and mental agony please.

Yours Obediently

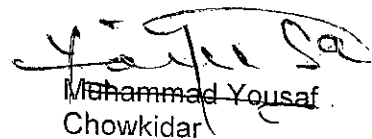


Muhammad Yousaf
Chowkidar
O/O Executive Engineer
Highway Division-I Peshawar

Copy in Advance to the Hon'ble Secretary C&W Department please.

Copy to the Executive Engineer Highway Division-I Peshawar for information please.





Muhammad Yousaf
Chowkidar

Dated 23/09/2021

Investigation in the present case has been completed and the accused/petitioner is no more required by the prosecution for further probe and investigation.

In light of the above, the instant bail petition is accepted and accused/petitioner is directed to be released on bail provided he furnishes bail bonds to the tune of Rs.100,000/- (One Lacs Rupees) with two local, reliable and resourceful sureties each in the like amount to the satisfaction of this Court.

It is pertinent to mention that findings of this Court are of tentative in nature and shall have no binding effect on the trial of the accused/petitioner as a mistaken relief of bail can be cured by convicting the accused but the liberty of a person cannot be curtailed if otherwise he makes his case good for the release on bail.

The requisitioned police record be sent back to the quarter concerned alongwith a copy of this order accordingly.

File of this Court be consigned to record room after its necessary completion and compilation.

Announced in open Court:
16th Day of April, 2020

ATTESTED
M

(Signature)
SHEHZAD AKHUNZADA,
ADDL: SESSIONS JUDGE, KIL,
PESHAWAR/DUTY JUDGE

No:	8799
Dated of Application	6-7-2020
Name of Application	
Word	2800 / 134-72
Fee	
Signature of Applicant	
Date of ...	6-7-2020

QUALIFIED TO BE TAUN
16 JUL 2020
Agency Sec.
Peshawar

VAKALATNAMA

BEFORE THE Khyber Pakhtunkhwa Service
Tribunal, Peshawar

_____ OF 2022

Muhammad Yousof

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

C&W Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Muhammad Yousof

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2022

Yousaf

CLIENT

M. Zaman Safi

ACCEPTED

**MIR ZAMAN SAFI
ADVOCATE**

OFFICE:

Room No.6-E, 5th Floor,
Rahim Medical Centre, G.T Road,
Hashtnagri, Peshawar.
Mobile No.0323-9295295

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.191/ 2022

Mr. Muhammad Yousaf (Chowkdiadar)
O/O Executive Engineer Highway Division-I Peshawar.

.....**Appellant**

Versus

1. The Secretary to Govt of Khyber Pakhtunkhwa C&W Department, Peshawar.
2. The Chief Engineer (Centre) C&W Department Peshawar.
3. The Executive Engineer Highway Division-I, Peshawar

.....**Respondents**

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4	Minutes of DPC dated 25.08.2021	II	6-8
5	Chief Engineer Centre letter No. 80-E/579/CE/C&WD dated 20.10.2021	III	9-10
6	Section Officer (Establishment) C&W Department letter No. SOE/C&WD/17-4/2021 dated 12.10.2021	IV	11

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
Service Appeal No. 191 of 2022

Mr. Muhammad Yousaf (Chowkidar)
O/O Executive Engineer Highway Division-I, Peshawar.

APPELLANT

VIS

1. The Secretary to Khyber Pakhtunkhwa, C&W Department, Peshawar.
2. The Chief Engineer (Centre) C&W Department, Peshawar.
3. The Executive Engineer Highway Division-I, Peshawar.

RESPONDENTS


REPLY OF OFFICIAL RESPONDENT(S)

Respectfully Sheweth!

PRELIMINARY OBJECTIONS

1. This Honorable Tribunal has got no jurisdiction to adjudicate the matter as no final or appellate orders have been passed nor any punishment is awarded.
2. The Appellant is estopped by his own conduct to prefer the appeal.
3. The Appellants has deliberately concealed the important facts/rules of the case from this Honorable Tribunal.
4. The Appellant has got no locus standi and cause of action.
5. The Appellant has not come to the Tribunal with clean hands.
6. The appeal is bad for misjoinder and non-joinder of necessary parties.
7. Respondent No.3 (XEN Highway Division-I, Peshawar) is irrelevantly impleaded as in the case of promotions to the post of Junior Clerk, he has no relevancy nor he is member of the Departmental Promotion Committee (DPC).

ON FACTS

1. Pertains to record.
 2. Correct to the extent that documents of Class-IV employees for whom 33% Quota is reserved for reservation to the post of Junior Clerks, were called in order to check the correct Educational qualification coupled with their length of service on the post.
 3. Correct to the extent that after checking the documents and ancillary informations, their final seniority was drawn and circulated accordingly.
 4. Not correct. Actually, the officials at S. No. 1 & 2 gave in writing to forego their promotion as on 12-11-2018, but the said Sub-Rule (5) of Rule-7 of the APPOINTMENT & PROMOTION RULES, 1989 was deleted by the Government of Khyber Pakhtunkhwa, Establishment Department vide Notification No.SO(Policy)E&AD/1-3/2020, dated 06-08-2020 (Annex-I) hence their case could not be considered as forgone, while on the others hand, their qualifications of Secondary School Certificate was awaited from the Board concerned. Similarly, the official at S. No. 4 (Mr. Sajjad Ahmad, Naib Qasid) did not provide his Secondary School Certificate and requested that he may be allowed to produce the Secondary School Certificate for the next Departmental Promotion Committee as the existing one was lost by him. So all the three posts were kept open for the three officials as their cases in the stated Departmental Promotion Committee meeting were deferred (minutes copy is Annexed-II), and not superseded.
- 

5. Incorrectly assumed. As replied in Para-4 above, and to compare with the claim of Petitioner as expressed in Para-4 of the main Appeal, appellant admits deferment of one who stands at S. No.4 of the seniority list, so under the rules, the posts had to kept reserved to him and other seniors.
6. Correct to the extent that out of 35 reserved posts (under 33% quota) 34-officials were promoted and one post was kept reserved for the official standing at S. No.4 as mentioned in Para-5, above, so the Appellant who is at S. No.38 of the list was not entitled for promotion under the circumstances as expressed in the above paras of reply. He should wait for his turn alongwith others till the post/vacancy under 33% Promotion quota becomes available.
7. Correct, the Appellant preferred Departmental Appeal (not through his office/Executive Engineer Highway Division-I, Peshawar) but direct to the Secretary C&W Department, (Respondent No.1). So far Respondent No.2 (Chief Engineer (Centre) is concerned, proper para-wise comments vide No.80-E/579/CEC/C&WD, dated 20-10-2021 were sent to Respondent No.1 in reference to Respondent No.1 memo No.SOE/C&WD/17-4/2021, dated 12-10-2021 (Annex-III & IV).
8. As expressed in above paras of reply, the Petitioner case is not fit in the present state, hence liable to rejection on the following replying grounds.

GROUNDS


- A- Incorrect, detailed reply has been given in above paras of reply.
- B- Incorrect, the appellant case is not worth consideration as per the position of post and the situation. The one post i.e. 35th post will have to be kept reserved for the person/persons senior to him as deferred by the Departmental Promotion Committee.
- C- Incorrect, the same as replied at-B, above.
- D- Incorrect. Any seniority by itself does not confer to base or term it for the purpose of promotion on the one hand and on the other, he has to wait for his turn.
- E- Every Civil Servant, when he is an employee of the Government shall perform, deliver good services at all the times. It does not, by itself, make a person to be benefitted without turn.
- F- Incorrectly drafted. The orders dated 03-09-2021 have been issued, observing all the relevant rules/regulations, which have attained the finality.
- G- Incorrect. In fact, it is the Appellant who is mis-quoting the rules/regulations only to get un-due benefit through this un-necessary and baseless litigations.
- H- Incorrect. The same as replied at-B, above.

I- The State counsel if allowed will place more proof /references before this Honorable Tribunal at the time of arguing the case.

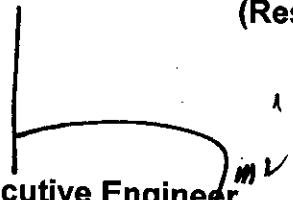
In the view of above stated facts and submissions, the Appeal before this Honorable Tribunal is without merit, hence liable to rejection with cost.



**Secretary C&W Department
(Respondent No.1)**



**Chief Engineer (Centre)
(Respondent No.2)**



**Executive Engineer
Highway Division-I, Peshawar
(Respondent No.3)
(Irrelevantly impleaded)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.191 of 2022

Mr. Muhammad Yousaf (Chowkidar)
O/O Executive Engineer Highway Division-I, Peshawar.

.....**APPELLANT**

Versus

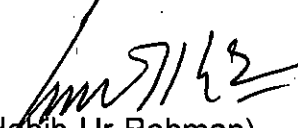
1. The Secretary to Khyber Pakhtunkhwa, C&W Department, Peshawar.
2. The Chief Engineer (Centre) C&W Department, Peshawar.
3. The Executive Engineer Highway Division-I, Peshawar.

.....**Respondents**

AFFIDAVIT

I, Habib-Ur-Rehman, Administrative Officer (BS-17) O/O Chief Engineer (Centre) C&W Department, Peshawar, do hereby solemnly state that the accompanying comments in the instant Service Appeal, drawn are correct to the best of my knowledge, belief and nothing has been kept secret/concealed from this Honorable Service Tribunal.

Deponent


 (Habib-Ur-Rehman)
 Administrative Officer
 O/O Chief Engineer (Centre)
 C&W Department, Peshawar.



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

NOTIFICATION

Dated Peshawar the, 06 / 8 / 2020

No. SO(Policy)E&AD/1-3/2020: In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the following further amendment shall be made, namely:

AMENDMENT

In rule 7, sub-rule (5) shall be deleted.

**CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA**

ENDST: NO & EVEN DATE

Copy is forwarded to:-

1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department.
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar Peshawar High Court, Peshawar.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. All Section Officers in Establishment & Administration Department.
15. The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.

Mardhalaj

Annex II

(6)

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE (DPC) MEETING HELD ON 25/08/2021 AT 1100 HRS UNDER THE CHAIRMANSHIP OF CHIEF ENGINEER (CENTRE) C&W PESHAWAR

A Meeting of the Departmental Promotion Committee (DPC) was held 25/08/2021 at 1100 Hrs under the Chairmanship of Chief Engineer (Centre) C&W Peshawar his office. The following attended: -

- | | |
|--|-----------|
| 1. Chief Engineer (Centre)
C&W Peshawar | Chairman |
| 2. Section Officer (Estb)
C&W Department Peshawar | Member |
| 3. Administrative Officer
O/O Chief Engineer (CDO)
C&W Peshawar | Member |
| 4. Administrative Officer
O/O Chief Engineer (Centre)
C&W Peshawar | Secretary |

The meeting was started with the recitation of Holy Quran.

The following items which were placed on the agenda were discussed in detail:

Item - I

PROMOTION OF HEAD DRAFTSMEN (BPS-14) TO THE CADRE POSTS OF CIRCL HEAD DRAFTSMEN (BPS-16)

Item - II

PROMOTION OF TRACERS (BPS-07) TO THE CADRE POSTS OF DRAFTSME (BPS-11/12)

Item - III

PROMOTION OF FERRO KHALASI/ FERRO PRINTER (BPS-02) TO THE CADRE POST OF TRACER (BPS-07)

Item - IV

PROMOTION OF DAFTARIES/ RECORD LIFTERS/ NAIB QASIDS/ CHOWKDIARS TO THE CADRE POSTS OF JUNIOR CLERKS (BS-11) (HAVING PASSED SECONDAR SCHOOL EXAMINATION)

The DPC after detailed discussion and keeping in view all pros & cons and Services Rules etc, in each case/ items, considered and cleared the following incumben officials to the next cadre posts as mentioned below: -

Item - I

Promotion of Head Draftsmen (BPS-14) to the Cadre posts of Circle Head Draftsmen (BPS-16)

SI No.	Name official	Remarks
1.	Waheed Zaman	Recommended for promotion to the cadre post of Circle Head Draftsman (BPS-16) on Regular basis.
2.	Muhammad Masood	Recommended for promotion to the cadre post of Circle Head Draftsman (BPS-16) on Regular basis.
3.	Khudadad Khan	Recommended for promotion to the cadre post of Circle Head Draftsman (BPS-16) on Regular basis.

Signature

Item-IV


Promotion of Daftaries/ Record Lifters/ Naib Qasids/ Chowkidars to the Cadre Posts of Junior Clerks (BPS-11)

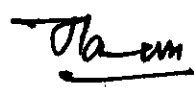
SI No.	Name official	Remarks
1.	S. Nighah Ali Shah (Chowkidar)	Deferred. Foregone his promotion/ not provided service documents.
2.	Shaidur Rehmat (Chowkidar)	Deferred. Foregone his promotion/ not provided service documents.
3.	Mumtaz Khan (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
4.	Sajjad Ahmad (Naib Qasid)	Deferred due to non-provision service documents.
5.	Abidur Rehman (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
6.	Zahoor Shah (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
7.	Shafi ur Rehman (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
8.	Ghareeb Jan (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
9.	Shahzad Gul (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
10.	Shah Munir (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
11.	S. Mehmood Ahmad (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
12.	Muzahir Hussain (Daftari)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
13.	Mohammad Saeed Khan	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
14.	Niaz Muhammad (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
15.	Khurshid Iqbal (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
16.	Syed Nadeem Abbas (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
17.	Saqib Saleem (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
18.	Mukaram Shah (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
19.	Muhammad Pervez (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
20.	Asif Khan (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
21.	Shahid Ahmad (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
22.	Javed (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
23.	Waheed Ahmad (Daftari)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.


Signature

SI No.	Name official	Remarks
24.	Zafar Iqbal (Daftari)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
25.	Sami Ullah (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
26.	Muhammad Naeem (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
27.	Ihsan Ullah (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
28.	Allauddin (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
29.	Adnan Afridi (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
30.	Bashir Ahmad	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
31.	Ainaz Ali (Chowkidar)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
32.	Shah Faisal (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
33.	Abdul Wahab	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
34.	Liaqat Ali (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
35.	Muhammad Abbas (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
36.	Tahir Ali (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.
37.	Khalid Hameed (Naib Qasid)	Recommended for promotion to the cadre post of Junior Clerk (BPS-11) on regular basis. He will be placed for probation for a period of one year.

The meeting was ended with vote of thanks from and to the Chair.


 (Mr. Muddasir Anwar)
 Administrative Officer
 O/O CE (CDO) C&W
 (MEMBER)


 (Mr. Zahoor Shah)
 Section Officer (Estb)
 C&W Department Peshawar
 (MEMBER)


 (Engr. Muhammad Uzair)
 Chief Engineer (Centre) C&W
 (CHAIRMAN)



Dated Peshawar the 20 /10/2021

Annex

9

To

The Secretary to Government of Khyber Pakhtunkhwa,
C&W Department Peshawar.

Subject:

APPEAL FOR REGULAR PROMOTION TO THE POST OF JUNIOR CLERK (B-11)

Enclose herewith please find an appeal in respect of Muhammad Yousaf Chwokddar office of XEN Highway Division Peshawar preferred before the worthy Secretary C&WD being appellate authority for promotion to the cadre post of Junior Clerk BPS-11 against the available vacancy.

In his application the said official stated that he is appearing at S. No 38 of the Seniority List of Matriculate Class-IV whereas promotion up-to S. No. 37 have been notified by the competent authority on the recommendation of Departmental Promotion Committee.

The said official refer to deferment of promotion of official at serial No . 1 & 2 for whom the posts were not kept reserved, whereas the official at Serial No. 04 was deferred and post kept reserved for him.

Annotated reply of the department is given as under:-

S.No	Content of Appeal	View Reply by the Department
1	That I am working as Chwokidar in the C&W Department since 2010 and appearing at Sl. No. 38 of the Seniority List of Matriculate Class-IVs.	No comments, Pertain to record.
2	That recently the Hon'able Chief Engineer (Centre) C&WD has issued promotion orders of my colleagues, against the already reserved promotion quota for such cadre to the post of Junior Clerks (B-11)	No comments, Pertain to record.
3	That according to the ibid quota, a total 35 No. officials were due to promotion, but the competent authority promoted only <u>34-Nos.</u> (upto Sl. No. 37), resultantly the undersigned was left due to the reason that one official namely Mr. Sajjad Ahmad (From Chitral) was not promoted/ <u>deferred on his own request and the post was illegally / unlawfully reserved for him.</u> Hence, it was the appellant, who could have been considered for promotion being next in the Seniority List, but it was not done, which amounts to illegality rather	As per existing Service Rules of C&W Department, 2010, 33% promotion quota for Matriculates Class-IV employees to the post of Junior Clerk has been reserved, which become 133 Nos posts. Out of which, 98-No. posts have already been filled from amongst Class-IV, while the remaining <u>35-No.</u> posts have recently been considered through DPC held on 25.08.2021 under the promotion policy.

injustice.	The DPC cleared, <u>34 Nos Class-IV</u> to the ranks of Junior Clerks. While Sajjad, Ahmad deferred by the D.P.C due to lack of ACRs, meaning thereby a post reserved by the D.P.C for the said deferred employee (Annexed-I).
4 On the other, Two officials at SL. No. 01 and 02 were also deferred on their own request(s) and accordingly two other individuals (being next in number) were promoted against the said deferred persons in the same promotion order, but the injustice has only done n my case except all others.	Incorrect, the requests of S. No. 1 & 2 were received and accordingly placed before D.P.C held on <u>14.12.2018</u> . The D.P.C accepted their requests and did not cleared them for promotion which are valid since <u>12.11.2018</u> to <u>11.11.2022</u> (4-years). However, the said policy has been discontinued by the Provincial government on <u>06.08.2020</u> (Annexed-II).
5 The above described action is also against the judgment of Hon'ble Supreme Court of Pakistan in similar nature case (Civil Appeal) bearing No. <u>316-L of 2009</u> passed / decided on <u>21.07.2016</u> , wherein reservation of post for a person (who as <u>deferred from promotion</u>) has been declared as illegal by the August Court (copy of order sheet attached for perusal)	Mr. Sajjad Ahmad (Naib Qasid) appearing at Sl.No. 04 of panel of promotion submitted an application on <u>24.08.2021</u> stating that he will manage/provide the relevant documents for the next D.P.C, therefore the D.P.C, deferred the said official under the Promotion Policy. Junior incumbent could be considered, if his senior was recommended for supersession, or senior person was involved in a serious inquiry and expected to be removed or dismissed from the service which was not the case.

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Amirul
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In view of above, the appellate authority (Secretary C&W Department) may like to reject the departmental appeal of the official, having no weightage, please.

Handwritten signature
CHIEF ENGINEER (CENTRE)



GOVT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Annex III

No. SOE/C&WD/17-4/2021
Dated Peshawar, the October 12, 2021

(11)

To

The Chief Engineer (Centre)
C&W Peshawar

Subject: APPEAL FOR REGULAR PROMOTION TO THE POST OF JUNIOR CLERK (BS-11)

I am directed to refer to the subject noted above and to forward herewith a copy of an appeal dated 23.09.2021 along-with its enclosure in respect of Mr. Muhammad Yousaf Chowkidar O/O XEN Highway Division No.1, Peshawar for immediate report, please.

Zahoor Shah

12.10.2021

(ZAHOOR SHAH)
SECTION OFFICER (Estb)

Endst even No. & date

Copy forwarded to PS to Secretary C&W Department, Peshawar

SECTION OFFICER (Estb)

G.E. C&W Deptt. (Centre)	
Diary No.	656
Date	4/10/2021
Case No.	
C.E. C&W	
S.E. (HQ)	
D.E. (P&T)	
T.O.	
A.O.	
B&AO	
C.D.	

AO



OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 177-E / 233 / CEC / C&WD

Dated Peshawar the 05 / 12 / 2022

OFFICE ORDER

On the recommendations of Departmental Promotion Committee in its meeting held on 02/12/2022, the following Class-IV (Daftaries/ Record Lifters/ Naib Qasids/ Chowkidars) have been cleared for promotion to the Cadre post of Junior Clerks (BS-11) in C&W Department on regular basis with immediate effect:-

1)	Mr. Fayaz Muhammad	=	Conditionally promoted on Regular basis
2)	Muhammad Nasir	=	On Regular basis
3)	Mr. Fayaz Khan	=	On Regular basis
4)	Mr. Muhammad Yousaf	=	On Regular basis
5)	Muhammad Arif	=	On Regular basis
6)	Muhammad Kamal	=	On Regular basis
7)	Muhammad Khalid Khan	=	On Regular basis
8)	Mr. Alamzib	=	On Regular basis
9)	Mr. Wajid Ali	=	On Regular basis
10)	Mr. Shaukat Hayat	=	On Regular basis
11)	Muhammad Nadeem Jamal	=	On Regular basis
12)	Mr. Siddique Ahmad	=	On Regular basis
13)	Mr. Zard Ali	=	On Regular basis
14)	Mr. Hameed Khan	=	On Regular basis
15)	Mr. Amir Tahir	=	On Regular basis
16)	Mr. Amir Shahzad	=	On Regular basis
17)	Syed Irfan Shah	=	On Regular basis
18)	Mr. Junaid	=	On Regular basis
19)	Mr. Saqib Waseem	=	On Regular basis
20)	Mr. Rehmanuddin	=	On Regular basis
21)	Mr. Sohail Ahmad	=	On Regular basis
22)	Mr. Ahmad Faraz	=	On Regular basis
23)	Mr. Arvez Khan	=	On Regular basis
24)	Mr. Nasir Khan	=	On Regular basis
25)	Mr. Sadiqur Rehman	=	On Regular basis
26)	Mr. Imran	=	On Regular basis
27)	Mr. Javaid Akbar	=	On Regular basis
28)	Mr. Mian Gul Jan	=	On Regular basis
29)	Mr. Nabeen Khan	=	On Regular basis
30)	Mr. Tahir Shah	=	On Regular basis
31)	Muhammad Ayaz	=	On Regular basis
32)	Muhammad Fayaz	=	On Regular basis
33)	Muhammad Fiaz	=	On Regular basis
34)	Mr. Tariq Nawaz	=	On Regular basis
35)	Mr. Shujat Ali	=	On Regular basis
36)	Mr. Aftab Amin	=	On Regular basis
37)	Mr. Juma Gul	=	On Regular basis
38)	Mr. Noor Wahid Jan	=	On Regular basis
39)	Mr. Adnan Khan	=	On Regular basis

2- On their Regular Promotion as Junior Clerks, they will be on probation for a period of one year in terms of Section-6(2) of Civil Servant Act, 1973 read with Rules-15(1) of the Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3- Consequent upon above promotions as Junior Clerks, the posting/ transfer of the following officials of C&W Department is hereby ordered, in the public interest with immediate effect:-

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
1)	Mr. Fayaz Muhammad Junior Clerk (BS-11)	Naib Qasid O/O CE (CDO) C&WD Peshawar.	Junior Clerk O/O CE (North) C&WD Saidu Sharif at Swat.	Conditional recommended as JC subject final decision of Supreme Court of Pakistan in CPLA No. 739-F/2021 Vice Zaid Iqbal promoted as SAC/CE
2)	Muhammad Nasir Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division Abbottabad.	Junior Clerk O/O XEN Building Division Abbottabad	

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
3)	Mr Fayaz Khan Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle Peshawar	Junior Clerk O/O XEN Highway Division Orakzai	Existing Vacancy
4)	Muhammad Yousaf Junior Clerk (BS-11)	Chowkidar O/O XEN Highway Division-I Peshawar	Junior Clerk O/O XEN Mega Project Division-I Peshawar	Vice Ali Rehman promoted as S/Clerk
5)	Muhammad Arif Junior Clerk (BS-11)	Naib Qasid O/O PCA C&WD Peshawar	Junior Clerk O/O XEN Mega Project Division-II Peshawar	Existing Vacancy
6)	Muhammad Kamal Junior Clerk (BS-11)	Chowkidar O/O RR&MT Lab C&W Deptt Peshawar	Junior Clerk O/O XEN Highway Division Orakzai	Existing Vacancy
7)	Muhammad Khalid Khan Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle DIKhan	Junior Clerk O/O XEN C&W Division Tank	Vice M. Raees promoted as S/Clerk
8)	Mr Alamzib Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Charsadda	Junior Clerk O/O XEN C&W Division Malakand	Existing Vacancy
9)	Mr Wajid Ali Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Charsadda	Junior Clerk O/O XEN Building Division Mardan	Vice M. Saeed Khan Lodhi promoted as S/Clerk
10)	Mr Shaukat Hayat Junior Clerk (BS-11)	Daftari O/O CE (Mega Projects) C&WD Peshawar	Junior Clerk O/O CE (North) C&WD Saidu Sharif at Swat.	Existing Vacancy
11)	Muhammad Nadeem Jamal Junior Clerk (BS-11)	Naib Qasid O/O CE (CDO) C&W Deptt Peshawar	Junior Clerk O/O XEN Maintenance Division-I Peshawar	Existing Vacancy
12)	Mr Siddique Ahmad Junior Clerk (BS-11)	Daftari O/O XEN Building Division Charsadda	Junior Clerk O/O XEN Highway Division Mardan	Vice Sajjad Nazar promoted as S/Clerk
13)	Mr Zard Ali Junior Clerk (BS-11)	Naib Qasid O/O XEN Mega Project Division-II Peshawar	Junior Clerk O/O *XEN Highway Division Mohmand	Vice Misbahullah promoted as S/Clerk
14)	Mr Hameed Khan Junior Clerk (BS-11)	Daftari O/O XEN Building Division Charsadda	Junior Clerk O/O XEN Building Division Mardan	Existing Vacancy
15)	Mr Amir Tahir Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Mansehra	Junior Clerk O/O XEN C&W Division Upper Kohistan	Existing Vacancy
16)	Mr Amir Shahzad Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle Mansehra	Junior Clerk O/O XEN C&W Division Upper Kohistan	Existing Vacancy
17)	Syed Irfan Shah Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle	Junior Clerk O/O XEN C&W Division Torghar	Existing Vacancy
18)	Mr Junaid Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle	Junior Clerk O/O XEN C&W Division Battagram	Existing Vacancy
19)	Mr Saqib Haseem Junior Clerk (BS-11)	Daftari O/O SE C&W Circle Mansehra	Junior Clerk O/O SE C&W Circle Mansehra	Existing Vacancy
20)	Mr Fehmanuddin Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Khyber	Junior Clerk O/O XEN Building Division Orakzai	Existing Vacancy
21)	Mr Sohail Ahmad Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division Swabi	Junior Clerk O/O XEN Building Division Swabi	Existing Vacancy
22)	Mr Ahmad Faraz Junior Clerk (BS-11)	Naib Qasid O/O CE (Centre) C&W Department Peshawar	Junior Clerk O/O CE (Centre) C&W Department Peshawar	Existing Vacancy
23)	Mr Arif Khan Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division Nowshera (drawing his pay & allowances against the post of Gauge Reader).	Junior Clerk O/O XEN Building Division Nowshera	Existing Vacancy
24)	Mr Nasir Khan Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division Charsadda (drawing his pay & allowances against the post of Mason)	Junior Clerk O/O XEN Highway Division Mohmand	Existing Vacancy
25)	Mr Sadique Rehman Junior Clerk (BS-11)	Naib Qasid O/O CE (Centre) C&W Department Peshawar	Junior Clerk O/O XEN Building Division-I Peshawar	Vice Zulfiqar promoted as S/Clerk
26)	Mr Imran Junior Clerk (BS-11)	Naib Qasid O/O SE C&W Circle Mansehra	Junior Clerk O/O XEN Mega Project Division-III Abbottabad	Existing Vacancy
27)	Mr Javid Aybar Junior Clerk (BS-11)	Chowkidar O/O XEN Building Division DIKhan	Junior Clerk O/O RR&MT Lab C&W Circle Bannu	Vice Akhtar Ali Gul promoted as S/Clerk
28)	Mian Gul Jan Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division Buner	Junior Clerk O/O XEN C&W Division-I Buner	Existing Vacancy

Sl No.	Name of officials	Existing posting	Proposed for actualization/ Adjustment	Remarks
29)	Mr. Nabeen Khan Junior Clerk (BS-11)	Naib Qasid O/O XEN C&W Division-I Buner	Junior Clerk O/O XEN C&W Division-I Buner	Existing Vacancy
30)	Mr. Tahir Shah Junior Clerk (BS-11)	Chowkidar O/O XEN C&W Division Buner	Junior Clerk O/O XEN C&W Division-I Buner	Existing Vacancy
31)	Muhammad Ayaz Junior Clerk (BS-11)	Naib Qasid O/O XEN Highway Division Khyber	Junior Clerk O/O XEN Building Division Khyber	Vice Asif Khan promoted as S/Clerk
32)	Muhammad Fayaz Junior Clerk (BS-11)	Naib Qasid O/O XEN Mega Project Division-II Peshawar	Junior Clerk O/O XEN Mega Project Division-II Peshawar	Existing Vacancy
33)	Muhammad Fiaz Junior Clerk (BS-11)	Naib Qasid O/O CE (East) C&W Department Abbottabad	Junior Clerk O/O XEN Mega Project Division-III Abbottabad	Existing Vacancy
34)	Mr. Tariq Nawaz Junior Clerk (BS-11)	Chowkidar O/O SE C&W Circle Mansehra	Junior Clerk O/O XEN C&W Division-II Buner	Existing Vacancy
35)	Mr. Shujat Ali Junior Clerk (BS-11)	Chowkidar O/O XEN Maintenance Division-I Peshawar	Junior Clerk O/O CE (North) C&WD Saidu Sharif at Swat	Existing Vacancy
36)	Mr. Aftab Amin Junior Clerk (BS-11)	Naib Qasid O/O CE (Foreign Aided) C&W Deptt Peshawar	Junior Clerk O/O XEN C&W Division Hangu.	Existing Vacancy
37)	Mr. Juma Gul Junior Clerk (BS-11)	Naib Qasid O/O XEN Building Division Charsadda	Junior Clerk O/O XEN Building Division Charsadda	Existing Vacancy
38)	Mr. Noor Wahid Jan Junior Clerk (BS-11)	Daftari O/O XEN Highway Division Charsadda	Junior Clerk O/O XEN Building Division Mohmand-	Existing Vacancy
39)	Mr. Adnan Khan Junior Clerk (BS-11)	Daftari O/O CE (Centre) C&W Department Peshawar	Junior Clerk O/O CE (Centre) C&W Department Peshawar	Vice Syed Rashid Raza promoted as S/Clerk

CHIEF ENGINEER (CENTRE)

Copy is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- Chief Engineers (Concerned) C&W Department.
- 3- Superintending Engineers (Concerned) C&W Department.
- 4- Principal Consulting Architect, C&W Department Peshawar.
- 5- Executive Engineers (Concerned) C&W Department.
- 6- Section Officer (Estb) C&W Department Peshawar/ Member DPC.
- 7- Administrative Officer O/O CE (CDO) C&WD Peshawar/ Member DPC.
- 8- District Accounts Officers, District (Concerned).
- 9- Cashier (Local).
- 10- Officials concerned.

CHIEF ENGINEER (CENTRE)