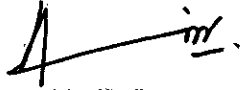


FORM OF ORDER SHEET

Court of _____

Appeal No. 1183/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/05/2023	<p>The appeal of Mr. Inayat Ullah presented today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>30-05-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1183 /2023

Inayat Ullah

V/S

Govt. of KP etc.

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S. NO	Documents	Annexure	Page No.
01.	Memo of Appeal	-----	01-04
02.	Certificate	-----	05
03.	Affidavit & Stay Application	-----	06-6a
04.	Copy of Upgradation dt; 07.03.2018	---A---	07
05.	Copy of Rules	---B---	08
06.	Copy of Seniority list	---C---	09-15
07.	Copy of covering letter of working paper	---D---	16
08.	Copy of Covering letter of working paper	---E---	17
09.	Copy of letter dated 05.12.2022	---F---	18
10.	Copy of departmental appeal	---G---	19
11.	Vakalat Nama	-----	20

APPELLANT

Inayat Ullah

THROUGH:

(M. ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,
OF PAKISTAN

(SYED NOMAN ALI BUKHARI)

ADVOCATE HIGH COURT,

&
(HILAL ZUBAIR)
ADVOCATE

Hilal
Zubair

Room No.FR-08, 4th Floor,
Bilour Plaza Peshawar Cantt:
Cell # 03339103240

1

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1183 /2023

Inayat Ullah SDO (OPS), sub engineer LBS (BPS-16)
CEW Deptt, Peshawar (APPELLANT)

VERSUS

1. The Secretary to Govt: of Khyber Pakhtunkhwa C&W Department, Civil Secretariat, Peshawar.
2. The Chief Engineer (Centre) Communication & Works Department, Khyber Pakhtunkhwa, Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNALS ACT, 1974 AGAINST THE LETTER DATED 05.12.2022 AND FOR NOT CONSIDERING THE APPELLANT FOR PROMOTION TO THE POST OF (ASSISTANT ENGINEER) BPS-17 BEING ELIGIBLE AS PER LAW AND RULES FROM DUE DATE i.e THE EXISTENCE OF VACANCY AND PROMOTION QUOTA AND AGAINST NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90-DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL THE RESPONDENT MAY DIRECTED TO CONSIDER THE APPELLANT FOR FOR PROMOTION TO THE POST OF (ASSISTANT ENGINEER) BPS-17 BEING ELIGIBLE AS PER LAW AND RULES FROM DUE DATE i.e THE EXISTENCE OF VACANCY AND PROMOTION QUOTA WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF THE APPELLANT.

RESPECTFULLY SHEWETH:**FACTS:**

1. That the appellant initially joined the C&W Department in the year 1986 as a Road Inspector and perform his duties with entire satisfaction of his superior, with full zeal and zest.
2. That the appellant promoted to Sub Engineer BPS-12 vide order dated 01.10.2006 and later scale was upgraded to BPS-16 on the basis of 10-Years service professional vide order dated 07.03.2018. **Copies of the upgradation letter is attached as Annex-A.**
3. That as per old rules of the respondent department, the appellant was on the Sr. No. 4 of the seniority list dated (21.02.2022), the appellant was senior, qualified and eligible, for promotion to the post of Assistant Engineer BPS-17 under old Rules. **Copy of the Rules & Seniority list are attached as Annex-B & C.**
4. That the appellant being eligible for promotion to the post of Assistant Engineer BPS-17, therefore, two times working paper prepared for promotion of the appellant but the same was delayed without any reasons. **Copy of the covering letters of working paper are attached as Annex-D & E.**
5. That the Establishment Department wrote a letter to Secretary to Govt. of Khyber Pakhtunkhwa C&W Department wherein stated the DPC may be postponed till the finalization of Standing Service Rules Committee which is illegal and against the Judgment of Supreme Court of Pakistan. **Copy of letter dated 05.12.2022 is attached as Annex-F.**
6. That in meanwhile the rules of respondent department was amended, which affect the seniority of the appellant now the department refused the promotion to the appellant for the reason that the service rules has been amended. The appellant being feeling aggrieved filed the departmental appeal for the promotion under the old rules but the same was not responded within statutory period of 90-days. **Copy of the departmental appeal is attached as Annex-G**

GROUND:-

- A) That not considering the appellant for promotion to the post of BS-17 under the Old Rules and not deciding the departmental appeal of the appellant within statutory period of 90-days are against the law, rules and natural justice.
- B) That according to the criteria of consideration for promotion, the appellant is eligible for the promotion from the post of BPS-16 to BPS-17 while the vacant post are also available and the appellant was on top of the seniority list.
- C) That the judgment of the Superior Court reported as (12-SCMR-965) is totally clear on this point, "*That rules operated prospectively and if a right was created in favour of an employee under the old rule, it could not be taken away on the ground that the amended rule had allowed other to compete*" the same principle is also follow in the latest judgment reported as 2023 SCMR-111.
- D) That it is clearly mentioned in the judgment of Superior Courts that, once the right of employee for promotion mature on the basis of the seniority list, that would not be suppressed by the new rules.
- E) That the regular vacancies are available and the appellant was on top of the seniority list dated 21.02.2022 but meanwhile rules of the respondent department are amended which would not apply on the appellant according to the judgment of Superior Courts.
- F) That as per new rules criteria for determination of seniority is change due to which the seniority and promotion which is already due badly affected. Therefore, as per Superior Court Judgment the appellant shall be treated under the Old Rules which was in field at the time posts were vacant and appellant was eligible.
- G) That despite having eligibility and seniority but due to the non-consideration for regular promotion according to old rules. The

appellant is kept deprived from the benefits of BPS-17 by the respondents is illegal and unwarranted.

- H) That the apeplant has not been treated as the spirit of Section-9 of Civil Servant Act, 1973 and the inaction of the respondents is against the spirit of Article-2A, 4, 9, 25 & 38 of the Constitution.
- I) That the promotion always be made from the date of vacancies, available in promotion quota, as per judgment of the Supreme Court.
- J) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT

Inayat Ullah
Inayat Ullah

THROUGH:

M. Asif Yousafzai

(M. ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,
OF PAKISTAN

Syed Noman Ali Bukhari

(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT,

Hilal Zubair

(HILAL ZUBAIR)
ADVOCATE

5

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. _____ /2023


Inayat-Ullah

V/S

Govt. of KP etc.

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.


APPELLANT

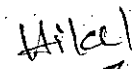
Inayat Ullah

THROUGH:


(M. ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,
OF PAKISTAN


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT,

& 
(HILAL ZUBAIR) ZUBAIR
ADVOCATE

6

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. _____/2023

Inayat Ullah

V/S

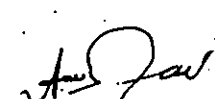
Govt. of KP etc.

AFFIDAVIT

I, Inayat Ullah, SDO (OPS) (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.


DEPONENT

IDENTIFIED BY:


(M. ASIF YOUSAFZAI)
ASC

69

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. _____/2023

Inayat Ullah

V/S

Govt. of KP etc.

.....

**APPLICATION FOR RESTRAINING THE
RESPONDENT DEPARTMENT FOR FILLING THE
VACANT POST ON PROMOTION ON THE BASIS
OF NEW RULES.**

RESPECTFULLY SHEWETH:

1. That the applicant has filed service appeal along-with this application in which no date has been fixed so far.
2. That the applicant has a good prime facie case and balance of convenience and also lies in favour of applicant.
3. That the grounds of main appeal may also be considered an integral part of this application.
4. That if the promotion was not stayed/the respondents are not restrained from making promotion under new rules.

It is, therefore, most humbly prayed that the respondents may be restrained from promotion against the post of Assistant Engineer BPS-17 under New Rules. Any other remedy, which this august Tribunal deems fit and appropriate that may also be awarded in favour of the appellant.

APPELLANT

Inayat Ullah
Inayat Ullah

THROUGH:

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)

ADVOCATE SUPREME COURT,
OF PAKISTAN

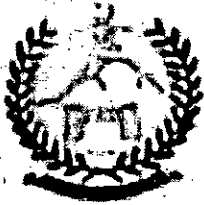
Syed Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)

ADVOCATE HIGH COURT,

&

Hilal Zubair
(HILAL ZUBAIR)

ADVOCATE



A 7

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

No SOI(FR)17-13/2017/253
Dated Peshawar, the 07-03-2018

NOTIFICATION

NO.FD/SOI(FR)17-13/2017/253, In pursuance of recommendations of the upgradation committee and approval granted by Competent Authority, sanction is hereby accorded to the upgradation of the post of Sub-Engineers from BPS-11/12 to BPS-16 (one time) as personal to the incumbents having 10 years or more service at their credit in the same scale in all the Government Departments of Khyber Pakhtunkhwa, with immediate effect

**SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT**

Endst No. & Date even.

Copy of the above is forwarded for information and necessary action to the:-

1. PS to Additional Chief Secretary, FATA
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar
4. Accountant General, Khyber Pakhtunkhwa, Peshawar
5. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
7. Secretary Provincial Assembly, Khyber Pakhtunkhwa
8. All Heads of Attached Departments in Khyber Pakhtunkhwa
9. Registrar, Peshawar High Court, Peshawar.
10. Registrar, Service Tribunal Khyber Pakhtunkhwa
11. The Treasury Officer, Peshawar.
12. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA
13. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar
14. PS to Finance Secretary
15. All Section Officers/Budget Officers in Finance Department


SECTION OFFICER (FR)



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Dated Peshawar, the March 26, 2018

NOTIFICATION:

No.SOE/C&WD/8-12/2014: In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Communication & Works Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department Notification No.SOE/C&WD/8-12/2009, dated 25th March, 2010, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix:-

i. against serial No.4, in column No.5, for the existing entries, the following shall be substituted, namely:

- (a) Sixty five percent (65%) by initial recruitment;
- (b) sixteen and half percent (16.50%) by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers who hold a Diploma of (Civil, Mechanical or Electrical) and have passed Departmental Professional Examination with 10 (ten) years service as such;
- (c) five percent (5%) by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers who possess Degree of B.E or B.Sc. Engineering (Civil, Mechanical or Electrical) at the time of their joining service and have passed Departmental Professional Examination with 05 (five) years service as such;
- (d) three and half percent (3.5%) by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers who acquired Degree of B.E or B.Sc. Engineering (Civil, Mechanical or Electrical) during service and have passed Departmental Professional Examination with 05 (five) years service as such; and
- (e) ten percent (10%) by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers having Degree of B-Tech (Hons) and have passed Departmental Professional Examination with 05 (five) years service as such;

ii. against serial No.26, in column No.5, for the existing entries, the following shall be substituted, namely:

"By promotion on the basis of seniority-cum-fitness, from amongst the Naib Qasids, Chowkidars and Barkandaz having qualification of Secondary School Certificate with at least three years service as such.

Note:- A joint seniority list of Naib Qasids, Chowkidars and Barkandaz shall be maintained for the purpose of promotion"

iii. after serial No.28, the following new serial shall be inserted, namely:

"29.	Barkandaz	Preferably literate	18 to 45 years	By initial recruitment"
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SECRETARY TO
Government of Khyber Pakhtunkhwa
Communication & Works Department

List of even number and date

Copy is forwarded to the:-

1. All Administrative Secretaries, Govt of Khyber Pakhtunkhwa
2. Secretary to Governor Khyber Pakhtunkhwa, Peshawar
3. Principal Secretary to Chief Minister Khyber Pakhtunkhwa, Peshawar
4. All Chief Engineers C&W Peshawar
5. Chief Engineer (FATA) W&S Peshawar
6. Chief Engineer (East) C&W Abbottabad
7. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar
8. All Superintending Engineers C&W Circles
9. All Executive Engineers C&W/Highway Divisions
10. Section Officer (R-VI) Establishment Department Peshawar
11. Assistant Legal Drafter-I, Law Department Peshawar
12. Manager Printing Press for publication in the issue of next Govt gazette. He is requested to provide 25 printed copies of the Notification, preferably gazetteed copies, when published to this Department along-with the details of the gazettee in which they are published.
13. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar
14. PS to Secretary C&W Department Peshawar
15. PA to Addl. Secretary C&W Department Peshawar
16. PA to Deputy Secretary (Admn) C&W Department Peshawar
17. Office File


(ABDUR RASHID KHAN)
SECTION OFFICER (Estb)



OFFICE OF THE CHIEF ENGINEER, CENTRE
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR
No. 266-EI/2116/CE/C&WD

Dated 21/02/2022

FINAL SENIORITY LIST

In pursuance 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. SOE/C&WD/8-12/2009 dated 25/03/2010, the Final Seniority List of Sub Engineers (BPS-16/12) B.Tech (Honors) Degree Holders (Other than Direct/Inservice Graduates Sub Engineers) of the C&W Department Khyber Pakhtunkhwa (as stood on 31/01/2022) is hereby Notified as under:-

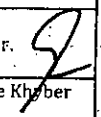
S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam	Remarks
1	Tariq Hussain	Muhammad Yousaf	Malakand	DAE(C)/ B.Tech (Hons) 08/2016	01-03-1969	28-06-1994	28-06-1994	B-16	2010	Seniority fixed as per merit order assigned by the NWFP PSC. (Panalized for 03-stages)
2	Murad Ali	Kiramal Khan	Bannu	DAE(C) + M.A + B.Tech (Honos), 11/2013	20/1/1964	31/10/1997	18/10/1999	B-16	2006	Promotee
3	Jawad Aamir	Muhammad Ikram	Mardan	DAE(C) B.Tech (Honos)	23-10-1982	01-08-2006	01-08-2006	B-16	Dec-2017	Appointed under deceased's son quota
4	Sami-ud-Din Shah	Saharud Din Shah	Kohat	DAE(C) B.Tech (Hons) 7/11	28-10-1966	24-11-1986	01-10-2006	B-16	2011	Service w.e.f 24/11/1986 to 30/09/2006 as Road Inspector
5	Inayatullah	Attallah	Lakki	DAE(C) / B.Tech (Honos), 08/2015	03-05-1969	03-04-1987	01-10-2006	B-16	2010	Service w.e.f 03/04/1987 to 30/09/2006 as Road Inspector.
6	Imdad Hussain	Jawad Hussain	Kohat	B.Tech (Hon)	10-04-1974	01-01-1995	01-10-2006	B-16	2010	Service w.e.f 01/01/1995 to 30/09/2006 as Road Inspector
7	Zahidullah Khan	Saadullah Khan	Kohat	DAE(C)/ B.Tech (Honos), 07/2016	20-10-1974	3/7/1995	1/10/2006	B-16	2010	Promotee
8	Fida Hussain	Gul Baz Khan	Kurram	B.Tech (Hon) 06/04/2020	22-04-1969	26-10-1995	01-10-2006	B-16	2008	Promoted from the post of Road Inspector
9	Zahidullah	Khaliq Dad	Kurram	DAE(C)/ B.Tech (Honos), 4/2013	14/4/1969	5/11/1995	1/10/2006	B-16	2010	Promotee
10	Arshad Ali Shah	Abdul Samad Khan	Mardan	DAE(C) / B.Tech (Honos), 01/2009	3/9/1970	9/4/1995	1/4/2008	B-12	2010	Promotee
11	Ziaullah Shah	Inayatullah Shah	North Waziristan	DAE(C) B.Tech(Hons) 08/2020	16/03/1991	14/01/2011	14/01/2011	B-12	Dec-2017	Appointed under deceased's son quota
12	Ahmad Ali	Afsar Khan	Bannu	DAE(C) B.Tech-(Hons)	04/05/1993	01/01/2012	01/01/2012	B-12	Oct-2018	Appointed under deceased's son quota
13	Muhammad Arif	Gul Muhammad	Malakand	DAE(C)/ B.Tech (Honos), (Civil) 2013	23/03/1986	01-09-2014	01-09-2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission.
14	Aftab Muhammad	Taj Muhammad	Charsadda	DAE(C) B.Tech	03/03/1991	01/09/2014	01/09/2014	B-12	Dec-2017	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam	Remarks
15	Niaz Muhammad	Taseer Khan	Dir Lower	DAE(C) B.Tech (Hons)	03/03/1992	01/09/2014	01/09/2014	B-12	Oct-2018	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
16	Sana Ullah ✓	Aam Khan	Charsadda	DAE(C) B.Tech (Hons) MS (Eng: Manag)	12/03/1993	01/09/2014	01/09/2014	B-12	Dec-17	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
17	Sana Ullah ✓	Syed Ghulam	Bannu	DAE(C) B.Tech	15/03/1991	01/09/2014	01/09/2014	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
18	Shah Faisal Khan	Fazli Haq	FR Bannu	DAE(C) B.Tech (Hons)	08/03/1991	01/09/2014	01/09/2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
19	Abdul Jamil ✓	Abdul Hameed	Lakki Marwat	DAE(C) / B.Tech (Hons) 11/2014	01/04/1981	01/09/2014	01/09/2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
20	Ghani Khan Khattak ✓	Tilawat Khan	Haripur	DAE(C) / B.Tech (Hons), (Civil) 2011	04/02/1988	01/09/2014	01/09/2014	B-12	Oct-2018	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
21	Anwar Badshah ✓	Shamsul Wahid	Malakand	DAE(C) / B.Tech (Hons) 01/2015	04/01/1990	01/09/2014	01/09/2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
22	Awais-ur-Rehman ✓	Haji Shah Daraz Khan	FR-Bannu	DAE(C) / B.Tech (Hons), (Civil) 2013	10/12/1989	01/09/2014	01/09/2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
23	Zia-ur-Rehman ✓	Muhammad Farooq	Abbottabad	DAE(C) / B.Tech (Hons), (Civil) 5/2011	17/08/1985	01/09/2014	01/09/2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
24	Farman Ullah ✓	Bait Ullah Khan	Karak	DAE(C) / B.Tech (Hons), (Civil) 8/2010	2/1/1979	01/09/2014	01/09/2014	B-12	2016	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
25	Babar Khan ✓	Zabardast Khan	Kohat	DAE(E) B.Tech	01/04/1973	17/09/1996	14/01/2015	B-12	2012	Promoted from the post of Supervisor
26	Tariq Shah ✓	Noor Hussain	Peshawar	(i) Matric (ii) DAE (C) B.Tech (Hons) 11/2013	24/04/1978	27/12/2008	14/01/2015	B-12	Dec-2017	Promoted from the post of Work Superintendent
27	Ibad-ur-Rehman ✓	Sher-Alam	Peshawar	(i) B.S.C (ii) DAE (C) B.Tech (Hons) 8/2011	03/03/1980	31/01/2007	14/01/2015	B-12	Dec-2017	Promoted from the post of Work Superintendent
28	Yasir Mehmood ✓	Zakir Ullah	Peshawar	DAE(C) / B.Tech (Hons) 11/2013	02/06/1989	24/01/2009	14/01/2015	B-12	Dec-2017	Promoted from the post of Work Superintendent
29	Hamad Pervez	Muhammad Pervez	Peshawar	(i) Matric (ii) DAE(C) / B.Tech (Hons)	13/03/1990	15/09/2009	14/01/2015	B-12	Oct-18	Promoted from the post of Work Supervisor
30	Muhammad Maaz	Gul Muhammad	Malakand	DAE(C) / B.Tech (Hons)	20/02/1990	06/06/2016	06/06/2016	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
31	Amir Aziz Wazir	Aziz ullah	F.R Bannu	DAE(C) B.Tech(Hon) 01/06/2018	14/01/1994	06/06/2016	06/06/2016	B-12	Dec-2017	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
32	Amir Ali	Noor Da Ali	Mardan	DAE(C) / B.Tech (Hons)	26/02/1989	18/08/2017	18/08/2017	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
33	Faheem Khan	Muhammad Aslam	Charsadda	DAE(C) / B.Tech (Hons)	20/04/1994	18/08/2017	18/08/2017	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
34	Inam Ullah	Mir Atta Ullah Khan	Bannu	DAE(C) / B.Tech (Hons)	05/12/1992	18/08/2017	18/08/2017	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
35	Akbar Khan	Shah Rawan	Swat	(i) B.A (2) B.Tech (Hons)	17/03/1986	08/09/2017	08/09/2017	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission

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15/11/2018
15/11/2018
BPS-27
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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam	Remarks
36	Waqar Ullah	Zia Ullah	S.W.A.	DAE(C) / B.Tech (Hons)	01/01/1993	18/08/2017	18/08/2017	B-12	Oct-18	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
37	Izhar Ul Haq	Aziz Ul Haq	Malakand	DAE(C) / B.Tech (Hons)	03/03/1990	29/01/2018	29/01/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
38	Babar-uz-Zaman Mughal	Qamar-uz-Zaman	Mansehra	DAE(C) B.Tech(Civil)	15/10/1989	06/02/2018	06/02/2018	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
39	Munir Ahmad	Muhammad Sadiq	S.W.A	DAE(C) / B.Tech (Hons) 03/2018	02/07/1994	01/02/2018	01/02/2018	B-12	Oct-2018	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
40	Mujahid Hussain	Munir Hussain	Kurram	DAE(C) / B.Tech	15/01/1996	30/01/2018	30/01/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
41	Muhammad Shoaib	Mashooq Jan	Mardan	DAE(C) B.Tech (Hons)	20/04/1989	30/01/2018	30/01/2018	B-12	Oct-2018	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
42	Saleem Javed	Inayat Ullah	Mohmand	DAE(C) / B.Tech (Hons)	14/01/1992	30/01/2018	30/01/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
43	Ishfaq Ullah Khan	Zarwali Khan	Bannu	DAE(C) / B.Tech (Hons)	18/05/1995	05/09/2018	05/09/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
44	Syed Faraz Shah	Ghulam Haider	Mardan	DAE (C) 2007 B.Tech (Civil)	25/01/1980	15/01/2011	30/03/2018	B-12	12/2020	Promoted from the post of Work Supervisor. Inter-se Seniority intact.
45	Muhammad Ibrar-ul-Haq	Shoaib Mahmood	Mardan	(ii) D.A.E (C) 2000 iii) B.Tech (Hon)	11/06/1981	17/01/2011	30/03/2018	B-12	OCT-2018	Promoted from the post of Work Supervisor. 
46	Hakeem Khan	Muhammad Anwar	D.I.Khan	B.Tech (Hon)	02/03/1992	16/07/2018	16/07/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
47	Zafran Ullah	Janat Gul	N.W	B.Tech (Hon)	10/04/1993	16/07/2018	16/07/2018	B-12	Oct-2018	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
48	Waseem Rizwan	Rizwan Ullah	Peshawar	B.Tech (Hon) 08/11/2020	01/03/1996	28/06/2018	28/06/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
49	Muqarab Khan	Sher Muhammad Khan	Bannu	DAE(C) B.Tech	25/03/1994	29/06/2018	29/06/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
50	Zia-ur-Rahman	Hsain Ullah Jan	Dir-Upper	B.Tech (Hon)	17/06/1993	29/06/2018	29/06/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
51	Muhammad Irshad	Zarif Gul	Mardan	B.Tech (Hon)	01/01/1991	28/06/2018	28/06/2018	B-12	01/2022	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
52	Kashif Ali Khan	Aftab Ali Khan	Swat	B.Tech (Hon)	09/02/1992	29/06/2018	29/06/2018	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
53	Farhan Ali Khan	Umer Ali Khan	Bannu	B.Tech (Hon)	10/12/1995	28/06/2018	28/06/2018	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
54	Ishfaq Ahmad	Muhammad Aslam	Mansehra	B.Tech (Hon)	31/05/1993	13/07/2018	13/07/2018	B-12		Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
55	Muhammad Saddiq	Fazli Wahid	Swabi	B.Tech (Hon)	20/04/1992	23/07/2018	23/07/2018	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam	Remarks
56	Muhammad Tufail	Subhanullah	Charsadda	DAE(C) B.Tech	23/03/1996	24/07/2018	24/07/2018	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
57	Kifayat Ullah Khan	Rafiullah Khan	Bannu	DAE(C) B.Tech	05/04/1995	23/07/2018	23/07/2018	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
58	Miraj Khan	Khalil Khan	Bannu	B.Tech (Hon)	08/04/1995	23/07/2018	23/07/2018	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
59	Fazl-e-Malik	Intizar Shah	Peshawar	B.Tech (Hon)	11/10/1994	23/07/2018	23/07/2018	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
60	Naveed-Ullah	Rahman-ud-Din	Mardan	B.Tech (Civil)	04/04/1995	03/01/2020	03/01/2020	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
61	Naeem Murad	Abdur Rehman	Peshawar	B.Tech (Hon)	24/02/1991	10/03/2020	10/03/2020	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
62	Irfan Ullah Khan	Obaid Ullah Khan	Bannu	B.Tech (Hon)	10/11/1995	06/01/2020	06/01/2020	B-12	01/2022	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
63	Muhammad Arif	Hassan Gul	FR Peshawar	B.Tech (Hon)	10/02/1991	03/01/2020	03/01/2020	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
64	Sohail Ahmad	Fazal Shah	Charsadda	B.Tech (Hon)	24/04/1992	06/01/2020	06/01/2020	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
65	Wahid Zaman	Rashid Khan	FR Bannu	B.Tech (Hon)	20/01/1993	06/01/2020	06/01/2020	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
66	Abdul Qadeer	Molvi Abdul Majeed	D.I.Khan	B.Tech (Hon)	05/01/1996	06/01/2020	06/01/2020	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
67	Ismail Khan	Sher Hameed	Dir Upper	B.Tech (Hon)	12/04/1992	06/01/2020	06/01/2020	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
68	Shakir Sultan	Muhammad Rasool	Karak	B.Tech (Hon)	01/04/1990	03/01/2020	03/01/2020	B-12	--	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
69	Ahmad Iqbal	Muhammad Iqbal	Mansehra	DAE (Civil) B.Tech (Civil)	21/04/1996	08/01/2020	08/01/2020	B-12	12/2020	Seniority fixed as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
70	Sajid Rehman	Rehman Gul	Peshawar	D.A.E (C) 2010 B.Tech (Hons) 30/11/2014	06/06/1991	22/01/2011	30/04/2021	B-12	--	Promoted from the post of Work Supervisor
71	Syed Owais Shah	Syed Sardar Shah	Kohat	DAE (Civil) B.Tech (Honor) 10/12/2018	26/10/1993	24/12/2021 A/N	24/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
72	Suliman Khan	Amir Laiq Khan	Dir Upper	DAE (Civil) B.Tech (Honor) 08/03/2018	06/04/1993	20/12/2021 A/N	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam	Remarks
73	Muhammad Waqar	Sarfraz Khan	Lakki Marwat	DAE (Civil) B.Tech (Honor) 30/11/2018	01/04/1995	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
74	Muhammad Imran	Abbas Khan	D.I.Khan	DAE (Civil) B.A D.Tech (Honor) 10/02/2016	05/10/1991	20/12/2021 A/N	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
75	Hayat Khan	Ghaz Noor	Charsadda	DAE (Civil) B.Tech (Honor) 30/11/2018	30/03/1994	21/12/2021	21/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
76	Said Alam	Yousaf Shah	Mohmand	DAE (Civil) B.Tech (Honor) 08/03/2018	28/05/1994	21/12/2021 A/N	21/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
77	Noor Ullah	Gul Afzal	Charsadda	DAE (Civil) B.Tech (Honor) 31/03/2017	03/03/1993	17/12/2021	17/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
78	Muhammad Shehzad Husain	Ghandal Khan	Charsadda	DAE (Civil) B.Tech (Honor) 12/01/2015	02/03/1991	21/12/2021	21/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
79	Javid Anwar	Gul Noor Khan	Dir Upper	DAE (Civil) B.Tech (Honor) 10/01/2015	20/03/1991	31/12/2021 A/N	31/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
80	Muhammad Toseef Arsalan	Muhammad Rafiq	D.I.Khan	DAE (Civil) B.Tech (Honor) 10/05/2017	10/04/1991	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
81	Gauhar Rehman	Wali Rehman	Dir Upper	DAE (Civil) B.Tech (Honor) 31/12/2016	02/08/1992	21/12/2021	21/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
82	Sohail Ahmad	Said Bacha	Mohmand	DAE (Civil) B.Tech (Honor) 07/10/2019	20/04/1994	17/12/2021	17/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
83	Farooq Ahmad	Gul Habib	Peshawar	DAE (Civil) B.Tech (Honor) 13/01/2014	15/04/1990	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam	Remarks
84	Niamat Ullah	Akhun Zada	Dir Upper	DAE (Civil) B.Tech (Honor) 08/03/2018	01/07/1993	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
85	Saeed Ullah Jan	Khaki Shah	Charsadda	DAE (Civil) B.Tech (Honor) 03/07/2014	10/10/1989	21/12/2021	21/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
86	Ihsan Rehman	Ghulam Khan	Dir Upper	DAE (Civil) B.Tech (Honor) 08/03/2018	14/06/1994	27/12/2021	27/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
87	Muhammad Baseer	Muhammad Usman	Karak	DAE (Civil) 11/11/2015 B.Tech (Honor) 16/06/2021	30/07/1995	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
88	Gul Sher	Gul Jabbin	Khyber	DAE (Civil) B.Tech (Honor) 19/04/2019	01/03/1996	17/12/2021 A/N	17/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
89	Deedar Khan	Stan Muhammad	Khyber	DAE (Civil) B.Tech (Honor) 16/01/2019	13/02/1995	17/12/2021	17/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
90	Sabir Hussain	Sardar Hussain	Swat	DAE (Civil) B.Tech (Honor) 15/05/2019	01/03/1989	18/12/2021	18/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
91	Adnan Yousaf	Rehman Yousaf	Dir Upper	DAE (Civil) B.Tech (Honor) 08/03/2018	12/10/1994	24/12/2021	24/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
92	Abdullah	Sher Muhammad Khan	Peshawar	DAE (Civil) B.A B.Tech (Honor) 18/02/2019	20/09/1992	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
93	Qaisar Mehmood	Muhammad Aslam	Haripur	DAE (Civil) B.Tech (Honor) 30/11/2014	05/04/1990	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
94	Munir Ahmad	Shahjehan	Mansehra	DAE (Civil) B.Tech (Honor) 15/11/2017	01/07/1994	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	BPS	Year of Passing prof. exam.	Remarks
95	Muhammad Suhail	Shamraiz Abbasi	Haripur	DAE (Civil) B.Tech (Honor) 31/12/2016	17/04/1992	20/12/2021	20/12/2021	B-12	--	Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).
96	Faisal Hayat	Fazal Rehman	Nowshera	DAE (Civil) B.Tech (Honor) 01/02/2015	30/06/1991	20/12/2021	20/12/2021	B-12	--	Disable Quota. Seniority fixed on the basis of Final Merit List of DSC in light of KP Civil Servant APT Rules-1989, Part-VI, Rule-17(1)(a).

Copy of the above forwarded to:-

1. The Secretary to Govt of Khyber Pakhtunkhwa, C&W Department Peshawar.
2. All Chief Engineers in C&W Department, Khyber Pukhtunkhwa.
3. The Managing Director, Pakhtunkhwa Highways Authority, Peshawar.
4. All Project Directors in C&W Department Khyber Pukhtunkhwa.
- 5 All the Superintending Engineers in C&W Department Khyber Pakhtunkhwa.
6. All the Executive Engineers in C&W Department Khyber Pakhtunkhwa.
7. The Assistant Director IT C&W Secretariat Peshawar. He is requested to upload the same on C&W official website. (www.cwd.gkp.pk)

CHIEF ENGINEER (CENTRE)

ADMINISTRATIVE OFFICER

GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

D 16



No SOE/C&WD/4-2/2022
Dated Peshawar the Nov 02 2022

To: The Chief Engineer (Genl) C&W Peshawar
The Special Secretary (Regulation) Establishment & Admin Department Peshawar
The Additional Secretary (Regulation) Finance Department Peshawar


Subject: MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE

Dear Sir

I am directed to refer to the subject noted above and to forward herewith working papers duly signed and to state that the Secretary C&W being chairman of the Departmental Promotion Committee has desired to convene meeting of Departmental Promotion Committee (DPC) on 10.11.2022 at 11:00 Hours under his chairmanship in the Committee Room of C&W Secretariat to discuss the promotion case of B-Tech (Hons) Sub Engineers to the rank of Assistant Engineer/SDO (BS-17). Working papers are enclosed.

It is requested to kindly make it convenient to attend the subject meeting on the scheduled date, time and venue, please.

Yours faithfully


(IJAZ KHAN)
SECTION OFFICER (Estb) 2/11/22

Encls even No. & date

Copy forwarded to the:

1 PS to Secretary C&W Department, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

E 17

No. SOE/C&WD/4-2/2022
Dated Peshawar, the Dec 01, 2022

- To
- 1 The Chief Engineer (Centre)
C&W Peshawar
 - 2 The Special Secretary (Regulation)
Establishment & Admn Department
Peshawar
 - 3 The Additional Secretary (Regulation)
Finance Department Peshawar


Subject **MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE**

Dear Sir

I am directed to refer to the subject noted above and to forward herewith working papers duly signed and to state that the Secretary C&W being chairman of the Departmental Promotion Committee has desired to convene meeting of Departmental Promotion Committee (DPC) on 05.12.2022 at 11:00 Hours under his chairmanship in the Committee Room of C&W Secretariat to discuss the promotion case of B-Tech (Hons) Sub Engineers to the rank of Assistant Engineer/SDO (BS-17). Working papers are enclosed

2. It is requested to kindly make it convenient to attend the subject meeting on the scheduled date, time and venue, please.

Yours' faithfully


(IJAZ KHAN)
SECTION OFFICER (Estb) 1/12/22

Endsl even No. & date

Copy forwarded to the:

1. PS to Secretary C&W Department, Peshawar
2. PA to Additional Secretary C&W Department, Peshawar
3. PA to Deputy Secretary (Admn) C&W Department, Peshawar

SECTION OFFICER (Estb)

F 18



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT & ADMN: DEPARTMENT
(REGULATION WING)

No.SOR-V(E&AD)/1-978/C&W/2022
Dated 5th December, 2022.

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
C&W Department.

Subject: **MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE**

Dear Sir,

I am directed to refer to your letter No.SOE/C&WD/4-2/2022 dated 01-12-2022 on the subject noted above and to state that the subject meeting scheduled for 05-12-2022 may be postponed till finalization of the Standing Service Rules Committee, please.

Your faithfully,

For. SECTION OFFICER (REG-V)

Endst: of even No. & Date.

Copy forwarded to the PA to Deputy Secretary Reg-III, Establishment Department.

SECTION OFFICER (REG-V)

G-1

To:

The Secretary to,
Government of Khyber Pakhtunkhwa,
Communication and Works Department.

Diary No: 1285
Date: 10-2-2023
Secretary C&W Dept

Subject: APPEAL FOR PROMOTION (Sub Engineer BPS 16 To BPS 17).
Reference: Notification No. SOE/C&WD/8-12/2023 Dated Jan 20, 2023

Respected Sir,

With all due respect it is stated to your kind honor that for the year 2022 the seniority list of B-Tech (Honors) Sub Engineers was revised & issued accordingly vide Notification No. 266-E/2116/CE/C&WD on dated Feb 21, 2022.

According to the above-mentioned list, a meeting of Departmental Promotion Committee (DPC) was called on Nov 10, 2022 at 1100 hours vide letter No. SOE/C&WD/4-2/2022 dated Nov 2, 2022, and was cancelled for unknown reasons.

Again, a meeting of Departmental Promotion Committee (DPC) was called on dated Dec:05, 2022 vide letter No. SOE/C&WD/4-2/2022 dated Dec: 01, 2022 and cancelled once again. As per prepared working papers for promotion, both the times we the appellants were entitled for promotion against the vacant seats and gravely suffered due to cancellation of DPC meetings during the year 2022.

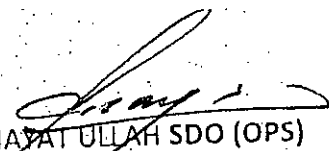
Now, before the revision of seniority list for the year 2023, a New Notification No. SOE/C&WD/8-12/2023 dated Jan 20, 2023 issued making amendments in existing Notification No. SOE/C&WD/8-12/2009 dated March 25, 2010 in which our promotion quota is divided & reduced from 10% to 4% and fixing the seniority on degree acquiring basis instead of date of appointments which will be another irreparable loss to our promotion.

Keeping in view our above grievances, we humbly appeal to your kind honor that before proceeding further with New Notification, promotion may please be granted to us according to working paper, seniority list and vacant seats of the year 2022.

We will be very thankful to you for this act of kindness.

Dated: 10 / 02 / 2023

APPELLANT


INAYAT ULLAH SDO (OPS)
(0346-9508376)

VAKALAT NAMA

NO. _____/2023

IN THE COURT OF KP Service Tribunal Peshawar

Inayatullah

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Govt of KP

(Respondent)
(Defendant)

I/We, Inayatullah

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court of Pakistan & Syed Noman Ali Bukhari, Advocate High Court & Hilal Zubair Advocate** 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 costs.

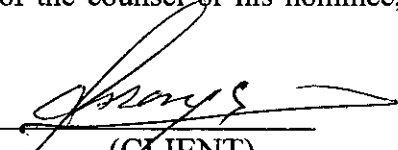
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.


AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

Dated _____/2023


(CLIENT)

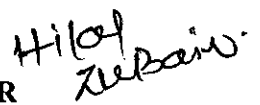
ACCEPTED


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
OF PAKISTAN.
(BC No. 10-7327)

 &
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