

SA7505/2021

20th Dec. 2022

Appellant alongwith counsel present.

Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate


SCANNED
KPST
Peshawar

General for the respondents present.

An application seeking permission to file amended appeal was submitted by the learned counsel for the appellant which was not objected to by the learned Assistant Advocate General. Hence, application stands accepted. Amended appeal filed. To come up for arguments on 21.03.2023 before the D.B.



(FAREEHA PAUL)
Member(E)



(ROZINA REHMAN)
Member (J)

21.03.2023

Appellant in person present.


Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

SCANNED
KPST
Peshawar

Former made a request for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 01.06.2023 before D.B. Parcha Peshi given to the parties.



(Muhammad Akbar Khan)
Member (E)




(Rozina Rehman)
Member (J)

13.10.2022

Appellant alongwith counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

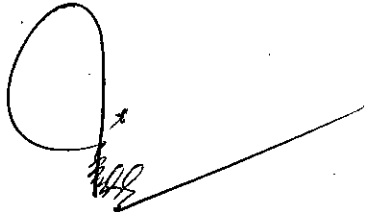
Written reply on behalf of respondents not submitted. Learned Additional AG seeks time for submission of written reply; granted subject to cost of Rs. 3000/-. Adjourned. To come up for written reply on 10.11.2022 before S.B.


(Fareeha Paul)
Member (E)

10.11.2022

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Abbas, Senior Clerk for the respondents present and submitted reply/comments which are place on file. Copy of the same handed over to the appellant. On previous order sheet cost of Rs. 3000/- stands imposed upon the respondents which is paid to the appellant. To come up for rejoinder, if any, and arguments before the D.B on 20.12.2022.

SCANNED
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Peshawar


(Mian Muhammad)
Member (E)

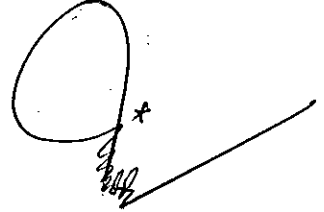
05.04.2022

Clerk of learned counsel for the appellant present.

Security and process fee not deposited. Clerk of learned counsel for the appellant submitted an application for submission of security and process fee. Application is allowed. Appellant is directed to submit security and process fee within one week, therefore, notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for Written reply/comments on 14.06.2022 before S.B.

Rs 500/-
Appellant Deposited
Security & Process Fee

Handwritten signature
08/04/22



(MIAN MUHAMMAD)
MEMBER(E)

14th June, 2022

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Abbas Khan, Asstt. for the respondents present.

Representative of the respondents seeks further time to furnish reply/comments. Request is accepted. To come up for written reply/comments on 26.07.2022 before S.B.

SCANNED
KPST
Peshawar



(Kalim Arshad Khan)
Chairman

26.07.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Reply on behalf of respondents is still awaited. Learned AAG requested for time to submit reply/comments; granted by way of last chance. To come up for reply/comments on 13.10.2022 before S.B.



(Rozina Rehman)
Member (J)

06.12.2021


Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is aggrieved of the impugned Notification dated 13.10.2015 whereby junior to the appellant on the seniority list dated 26.08.2015, were promoted as SDO and the appellant was ignored and deprived of his due rights despite the fact that the question of non-availability of his ACR's was no longer in the field. The appellant approached the Peshawar High Court, Peshawar in writ petition No. 3210-P/2017 which was disposed of on 05.12.2017 under Article 212(2) of the Constitution, hence, the instant service appeal filed in the Service Tribunal on 30.09.2021. Learned counsel for the appellant was confronted with the question of limitation as to whether it would run from the date of judgement of the Peshawar High Court on his writ petition dated 05.12.2017 or from the date of impugned Notification passed by respondent No. 1 on 13.10.2015?. He argued that promotion being a recurring cause, no limitation runs against such cases.

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 01.02.2022 before S.B.


(Mian Muhammad)
Member(E)

01.02.2022 Appellant in person present and submitted application for extension of time to deposit security and process fee. Application is allowed and appellant is directed to deposit security and process fee within 03 working days. Thereafter notice be issued to respondents for submission of reply/comments before the S.B on 05.04.2022.



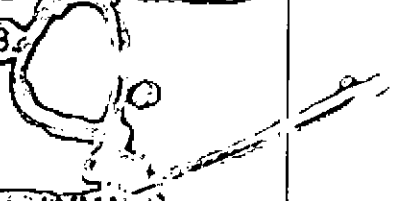

(Atiq-Ur-Rehman Wazir)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7505 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/09/2021	<p>The appeal of Mr. Zia Jan presented today by Mr. Fazal Shah Mohmand 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>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>06/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><u>06.12.2021</u> Junior of learned counsel for the appellant present. Junior of learned counsel for the appellant seeks adjournment on the ground that she has not prepared the brief to come up for preliminary hearing on 01.02.2022 before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Amended Service Appeal No _____/2022

Zia Jan.....Appellant

V E R S U S

Govt. & Others.....Respondents

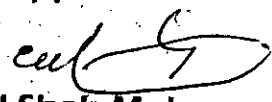
INDEX

S.No	Description of documents	Annexure	Pages
1.	Amended Service Appeal with Affidavit		1-4
2.	Application for condonation of delay with Affidavit		5A
3.	Copies of documents	A	5-7
4.	Copy of Seniority List dated 26-08-2015	B	8-19
5.	Copy of Notification dated 13-10-2015	C	20-
6.	Copies of Letters	D	21-22
7.	Copy of Writ Petition & Order dated 05-12-2017	E	23-29
8.	Copy of Comments & Letter dated 15-02-2018	F & G	30-38
9.	Vakalat Nama		40

Dated:- -12-2022

3
Appellant

Through


Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Amended Service Appeal No _____/2022

Zia Jan, Sub Engineer, (Retired), Office of Executive Engineer,
Communication & Works Division Charsadda**Appellant**

V E R S U S

1. Govt. of Khyber Pakhtunkhwa through Secretary, Communication & Works Department, Civil Secretariat Peshawar.
2. Chief Engineer, (Centre), Communication & Works Department, Civil Secretariat Peshawar.
3. Chief Secretary, Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.**Respondents**

AMENDED SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA, SERVICE TRIBUNAL ACT 1974 AGAINST
THE ORDER ISSUED VIDE LETTER DATED 15-02-2018 AND
COMMUNICATED TO THE APPELLANT ON 10-11-2022
WHEN RESPONDENTS FILED REPLY/COMMENTS IN THIS
HONORABLE TRIBUNAL, WHEREBY, DEPARTMENTAL
APPEAL OF THE APPELLANT HAS BEEN REJECTED

PRAYER:-

On acceptance of this appeal the impugned Order issued vide letter dated 15-02-2018 and communicated to the appellant on 10-11-2022, may kindly be set aside and the appellant may granted proforma promotion as Assistant Engineer/SDO (BPS-17) with effect from 13-10-2015 with all back benefits.

Respectfully Submitted:-

1. That the appellant had earlier filed the above the titled Service Appeal by which time, order on departmental appeal of the appellant was not communicated to the appellant, however respondents annexed copy of letter dated 15-02-2018 with their comments on 10-11-2022 whereby departmental appeal of the appellant has been rejected, hence, this amended service appeal.
2. That the appellant is highly qualified who has passed his Diploma of Associate Engineer with Bachelor of Civil Technology from the University of Engineering and Technology Peshawar. **(Copies of documents are enclosed as Annexure A).**

2

3. That the appellant was appointed as Sub Engineer on 22-02-1979 and remained posted to various Districts including Kurram Agency, Abbottabad, Dir etc and was lastly transferred to District Charsadda in the year 2001.
4. That since appointment, the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups with no complaint during his entire service career of 38 years.
5. That the name of the appellant was placed at serial No 2 of the Final Seniority of Diploma Holders, Sub Engineers dated 26-08-2015. **(Copy of Final Seniority List is enclosed as Annexure B).**
6. That in the year 2015, process for promotion of Sub Engineers (BPS-16) to Assistant Sub Engineers/SDOs (BPS-17) was initiated and the appellant being perfectly fit and eligible and coming up to the criteria was also considered but was deferred for the want of provision of PERs/ACRs for the period from 22-02-1979 to 31-12-2013, however Junior to him were considered and promoted including Mian Muzakkar Shah and Zahir-Ur-Rehman vide Notification dated 13-10-2015. **(Copy of Notification dated 13-10-2015 is enclosed as Annexure C).**
7. That the ACRs/PERs of the appellant were provided to the respondents for the period 22-02-1979 to 31-12-2014 and requested for his promotion as Assistant Engineer/SDO (BPS-17) w. e. f. 3-10-2015 but no action has been taken so far despite the lapse of about two years. **(Copies of Letters are enclosed as Annexure D).**
8. That the appellant approached the honorable Peshawar High Court by filing Writ Petition No 3210-P/2017 wherein respondents were directed to treat the same as departmental appeal and decide the same within stipulated period in accordance with law vide order dated 05-12-2017 but with no response. **(Copy of Writ Petition & order dated 05-12-2017 is enclosed as Annexure E).**
9. That the appellant then filed the stated service appeal however they annexed copy of letter dated 15-02-2018 with their comments on 10-11-2022, (which was never communicated earlier to the appellant), hence the appellant requested for permission to file amended

appeal hence this appeal. **(Copy of Reply/Comments & Letter dated 15-02-2018 is enclosed as Annexure F & G).**

10. That the impugned letter dated 15-02-2018, is against the law, facts and principles of justice on grounds inter-alia as follows:

GROUND:

- A. That the omissions and commissions of the respondents and letter dated 15-02-2018 are illegal, unconstitutional, and unlawful, without lawful authority and of no legal effect, therefore need the interference of this honorable Tribunal.
- B. That the appellant has served for about 38 years and retired from service in May 2016 with spotless service career, is senior, besides having excellent ACRs during this period and as such is perfectly fit and eligible to be promoted as Assistant Engineer/SDO (BPS-17) w.e.f. 13-10-2015.
- C. That the appellant is perfectly fit, eligible, senior and coming up to the criteria as per law and rules on the subject, while juniors to him have been promoted denying such right to the appellant for no fault on his part.
- D. That the appellant was deferred from promotion as Assistant the appellant duly provided to the respondents and the reasons of deferment cease to exist but even then the appellant is not promoted in violation of law and rules on the subject.
- E. That even the promotion policy and the instructions of the provincial Govt., are very much clear which also favor the prayer of the appellant in very clear words, the appellant is entitled to proforma promotion w.e.f. 13-10-2015.
- F. That promotion being recurring cause of action and Rule 17 of the Fundamental Rules protects such promotions.
- G. That Seniority cum fitness is the universal formula governing promotion which is also protected by law and rules on the subject, thus too the appellant is entitled to proforma promotion.
- H. That the fundamental rights of the appellant have been violated guaranteed in the Constitution and respondents are not ready to treat the appellant as per law and rules on the subject.

I. That the fundamental rights of the appellant guaranteed in the Constitution are badly violated and he is not treated as per law and rules governing the matter, he would suffer irreparable loss.

J. That the appellant seeks the permission of this honorable Court for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

Any other relief deemed appropriate in the circumstances of the case and not specifically asked for may also be granted in favor of the appellant.

Dated:- -12-2022


Appellant

Through



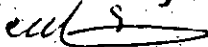
Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

AFFIDAVIT

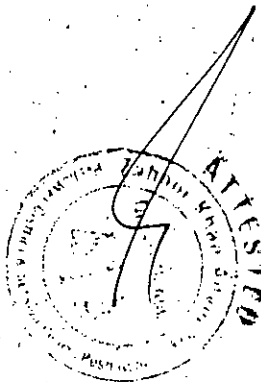
I, Zia Jan, Sub Engineer, (Retired), Office of Executive Engineer, Communication & Works Division Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Appeal**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.


DEPONENT

Identified by



Fazal Shah Mohmand
Advocate Peshawar



20 DEC 2022

5A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Amended Service Appeal No. _____/2022

Zia Jan.....**Appellant**

V E R S U S

Govt. & Others.....**Respondents**


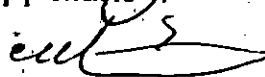
Application for the condonation of delay if any

Respectfully Submitted:-

1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
2. That the grounds of appeal may be considered as integral Part of this application.
3. That the appellant approached respondents for his promotion and he was time and again assured that his appeal will soon be decided due to which he visited time and again but to no avail.
4. That even juniors to the appellant have been promoted while denying such right to the appellant which is recurring cause of action and the loss is caused to the appellant every month.
3. That even otherwise law as well as the superior Courts dictas favors decision of cases on merit instead of technicalities.

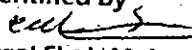
It is therefore prayed, that on acceptance of this application, the delay if any in filing of instant appeal may kindly be condoned

Dated:- -12-2022

Appellant 
 Through 
Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

AFFIDAVIT

I, Zia Jan, Sub Engineer, (Retired), Office of Executive Engineer, Communication & Works Division Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by 
Fazal Shah Mohmand
Advocate Peshawar



20 DEC 2022

DEPONENT 

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

5. 7 "A"

H. W. F. B. Board of Technical Education Peshawar

Serial No. 1034

S-E-S-S-I-O-N 1978

Roll No. 2377

ANNUAL SUPPLEMENTARY

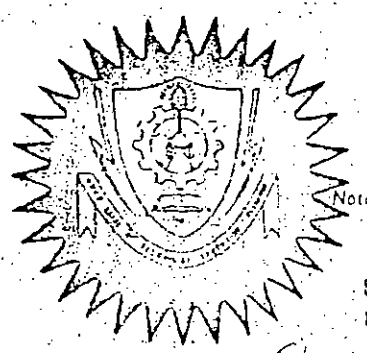
This is to certify that Mr. ZIA JAN son of Mr. MOHABAT KHAN Registration No. P.P/73-585 of Government Polytechnic Institute PESHAWAR has satisfactorily completed Three Years Programme of Instructions in CIVIL Technology, and has passed the Final Year Diploma of Associate Engineer Examination held in the month of JULY 1978 Securing 1733/3250 Marks and has been placed in SECOND Division.

In recognition thereof this Diploma of Associate Engineer is awarded at Peshawar.

on the 22nd day of the month of April 1979.

The Examination was taken ~~as~~ a whole/in part.

Note: THIS DIPLOMA IS ISSUED WITHOUT ANY ERASING/OVERWRITING



Abdul Qadir
SECRETARY
Dated, Peshawar 22-4-1979.

Majid Ahmed
CHAIRMAN

Handwritten signature
ATTESTED TO BE TRUE COPY

-6- (8) بسم الله الرحمن الرحيم

University of Peshawar (Pakistan)

Session: ANNUAL 1996

ZIA JAH son of MOHABAT KHAN and a student
of TEHRAMAN DISTRICT having passed the prescribed examination
in SCIENCE 1996, is this day admitted by the University of Peshawar
to the Degree of

Bachelor of Science

in the SECOND Division SCIENCE passed also in ISLAMIYAT
as an Additional/Optional Subject.

The examination was taken as a whole/in parts

Serial No. 000196

Registered No. DEP/A-3462

Roll No. 1274

28TH FEBRUARY 1997



[Signature]
Registrar

Countersigned

[Signature]
Vice-Chancellor

[Signature]
ATTESTED
TO BE TRUE COPY

C/E
P: 1

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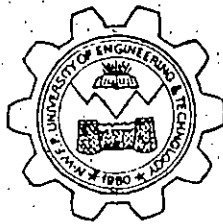


-7-

Roll No. 008

Registered No. 82-B.Tech/C-15

N-W.F.P.
UNIVERSITY OF ENGINEERING
AND TECHNOLOGY



Session 1984-85

This is to certify that

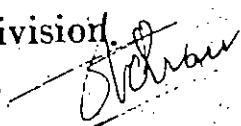
ZIA JAN SON OF MUHABAT KHAN


and a student of Government College of Technology, Peshawar

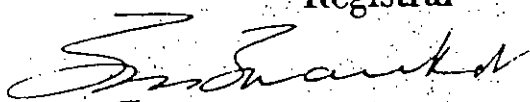
has been duly admitted to the Degree of

Bachelor of CIVIL Technology (Pass Course)


He has been placed in SECOND Division


Vice-Chancellor


Registrar


Controller of Examinations

Peshawar, the 31st March, 1986.


ATTESTED
TO BE TRUE COPY

-8- (11)

"B"

ATTESTED
TO BE TRUE COPYOFFICE OF THE CHIEF ENGINEER, CENTRE
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR
No. 266-E/ 106 /CE/C&W

Dated 26/08/2015

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&W/D/8-12/2009 dated 25/03/2010 (for S.No. 4(a) read with Law Department clarification No. OP.05(64)LD/2010/19101 dated 30/11/2010 and Secretary C&W Department memo No. SOE/C&W/D/13-21/2010 dated 09/01/2013, Final Seniority List of Diploma Holders, Sub Engineers (BPS-11/16) (Other than Direct/Inservice Graduates & B-Tech- Tech Hons Holder Sub Engineers) of the C&W Department as stood on 24/08/2015 is hereby notified as under:-

S.No	Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
1	Muhammad Zubair-I	Wasal Khan	Peshawar	BA/DAE(C)	15/03/1959	12/02/1979	12/02/1979	17/11/1991	2006	
2	Zia Jan	Mohabat Khan	Charsadda	DAE(C)/B.Tech(C) (Pass)	13/05/1956	22/02/1979	22/02/1979	B-11	2010	
3	Faiz Muhammad Faiz	Pazeer Muhammad	Mardan	DAE(C)	15/04/1958	05/03/1979	05/03/1979	07/08/1994	1996	
4	Mian Muzakkar Shah	Mehr Shah	Charsadda	DAE(C)	12/03/1957	10/03/1979	10/03/1979	17/11/1991	1996	
5	Zaheer-Ur-Rehman	Said Rehman	Peshawar	DAE(C)	25/03/1957	10/03/1979	10/03/1979	17/11/1991	2006	
6	Ghulam Habib	Ghulam Said	Lakki	DAE(E)	24/11/1957	18/03/1979	18/03/1979	07/08/1994	1996	
7	Muhammad Arif-III	Karim Bekhsh	Peshawar	DAE(M)	12/09/1956	17/10/1979	17/10/1979	04/09/2003	2002	
8	Gul Qadeer	Amir Taj Ali Khan	DI Khan	DAE (E)	19/03/1956	18/11/1979	18/11/1979	20/03/1995	1996	
9	Ali Asghar	Ghulam Akbar	Mardan	DAE(C)	20/05/1959	24/11/1979	24/11/1979	05/10/1995	1996	
10	Fazal Nabi	Sher Rehman	Khyber	(i) B.A/DAE(C) (ii) B.Tech (Hons) 11/2013	08/01/1958	26/11/1979	26/11/1979	17/11/1991	1993	The above mentioned official has given option/undertaking that his name may be deleted from the B.Tech (Hons) Degree Holders List and may be enlisted in the Seniority List of Diploma Holders Sub Engineers (BS-11/16)
11	Salim-ur-Rehman	Abdur Rehman	Abbottabad	DAE(C)	13/04/1959	27/11/1979	27/11/1979	04/12/1995	Not cleared	
12	Amin Jan	Ghulam Mohyuddin	Peshawar	DAE(C)	20/09/1958	29/11/1979	29/11/1979	04/12/1995	1993	
13	Fazal Raziq-II	Muhammad Umar	Charsadda	DAE(C)	12/01/1959	02/12/1979	02/12/1979	15/12/1995	1993	
14	Daulat Khan	Basir Khan	NWA	DAE(C)	09/03/1958	05/12/1979	05/12/1979	B-11	1993	
15	Zahir Gui	Saeed Gui	Mardan	DAE(C)	01/05/1957	09/12/1979	09/12/1979	B-11	1993	
16	Abdul Qayyum-I	Anwar Bagh	Khyber	DAE(C)	16/03/1959	21/01/1980	21/01/1980	B-11		

CTE
26/8

9-II

Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing Prof. exam	Remarks	
16	Arzeb Khan-III	Rehmanullah	Swabi	DAE(C)	01/10/1956	23/01/1980	23/01/1980	B-11	1993	
17	Muhammad Tariq	Aman ul Mulik	Swal	DAE(C)	04/04/1958	08/12/1979	30/01/1980	C4/09/2003	1996	(H) Previous service as Draftsman from 08/12/1979 to 23/01/1980 (H) Granted B-16 on decision of Service Tribunal vide C&WD order No.50F/C&WD/4-2/2013 dated 10-10-2013
18	Muhammad Shafiq-II	Kala Khan	Abbottabad	DAE(C)	14/05/1958	04/06/1980	04/06/1980	B-11	1993	
19	Abdul Hamid-I	Abdul Qudus	Malakand	DAE(C)	12/12/1955	05/06/1980	05/06/1980	B-11	2008	
20	Mutahir Khan	Muzaffar Khan	Malakand	DAE(C)	02/04/1960	05/06/1980	05/06/1980	B-11	2008	
21	Sanaullah-III-Tajon	Muslim Khan	Lakki	DAE(C)	02/02/1958	07/06/1980	07/06/1980	C8/04/2004	1996	
22	Malik Shakir Perveez	Malik Dilawar Khan	Kohat	DAE(C)	28/04/1959	08/06/1980	08/06/1980	B-11	1993	
23	Naushad Khan-I	Fazl Muhammad Khan	Peshawar	(H) B.A. DAE(C) (B) CT, 2002	12/12/1959	14/06/1980	14/06/1980	B-11	1997	
24	Zafarullah Khan	Ahbebulah	Nowshera	DAE(C)	10/03/1959	10/07/1980	10/07/1980	03/04/2004	2008	
25	Naushad Khan-II	Muhammad Saifur Khan	Nowshera	DAE(C)	15/04/1956	13/07/1980	13/07/1980	B-11	2008	
26	Ikramullah-II	Nasrullah	Peshawar	DAE(C)	24/09/1950	14/07/1980	14/07/1980	12/8/2003	1995	Granted B-16 on the decision of Service Tribunal vide Secretary Works & Service Department Order dated: 3/08/2009
27	Tariq Usman	Noor Sahib Khan	Karak	DAE(C)	05/04/1961	16/02/1981	16/02/1981	03/04/2004	2010	
28	Noorul-Basar	Umer Khitab	Peshawar	DAE(C) / B.Tech (C) Pass	16/02/1959	19/02/1981	19/02/1981	B-11	2006	
29	Muhammad-Javed Bahim	Abdur Rahim	DI Khan	DAE(C)	31/12/1958	01/04/1981	01/04/1981	03/04/2004	1996	
30	Nisar Ahmad	Haji Mir Sardar	SWA	DAE(C)	15/06/1956	08/06/1981	08/06/1981	B-11	2010	
31	Jamshid Khan-I	Saifur Rehman	Malakand	DAE(C)	21/03/1956	22/11/1981	22/11/1981	03/04/2004	2008	
32	Inamul Haq Babar	Shamsul Haq	Nowshera	DAE(C)	18/12/1958	15/11/1981	15/11/1981	B-11	1993	
33	Zain-ul-Abidin	Muhammad Idris	Swabi	DAE(C)	06/04/1961	15/11/1981	15/11/1981	B-11	2010	
34	Muhammad Ahmad Khan-II	Lal Muhammad Khan	Peshawar	DAE(C)	23/09/1961	18/11/1981	18/11/1981	B-11	2011	
35	Muhammad Hamid Zia	Muhammad Zia	Peshawar	DAE(C)	01/07/1961	22/11/1981	22/11/1981	B-11	1996	
36	Khalid Naeem	Raja Muhammad Ajab	Abbottabad	DAE(C)	01/10/1961	09/12/1981	09/12/1981	B-11	2010	
37	Sarfaraz Alam	Hakim Ali	Peshawar	DAE(C)	30/12/1956	16/12/1981	16/12/1981	B-11	2011	
38	Gul Malook	Sher Jhang	Lakki	DAE(C)	09/07/1959	16/12/1981	16/12/1981	C4/09/2003	1996	Granted B-16 on the decision of Service Tribunal vide Secretary SG&WD Order No.50F/C&WD/4-2/2013 dated 10-10-2013

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Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to pwn	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
1. Muhammad Nasim-II	Faqir Hussain	Mansehra	DAE(C)	01/12/1960	14/03/1988	14/03/1988	B-11	Not cleared	
2. Ghulam Rahim	Ghulam Rashid	Malakand	DAE(C)	20/04/1961	14/03/1988	14/03/1988	B-11	2006	
3. Syed Nawazish Ali Shah	Syed Miskeen Shah	Mansehra	DAE(E)	06/03/1962	14/03/1988	14/03/1988	B-11	2006	
4. Syed Tariq Mehmood	Syed Wazir Hussain Shah	Abbottabad	DAE(C)	01/01/1963	14/03/1988	14/03/1988	B-11	2006	
5. Sadiqullah	Haji Inayat Khan	NWA	DAE(C)	15/03/1963	14/03/1988	14/03/1988	B-11	2010	
6. Saeedulreh	Fazal Karim	Kohat	DAE(C)	13/07/1964	14/03/1988	14/03/1988	B-11	2006	
7. Fazal Rehman-IV	Said Muhammad	DI.Khan	DAE(C)	27/03/1965	14/03/1988	14/03/1988	B-11	2006	
8. Aurangzeb-V	Gul Muhammad Khan	NWA	DAE(C)	05/04/1965	14/03/1988	14/03/1988	B-11	2006	
9. Zubair Ullah Babar	Khairullah	Nowshera	DAE(C)	10/04/1965	14/03/1988	14/03/1988	B-11	2008	
10. Ahmad Ali	Maulana Muhammad Yaqoob	NWA	DAE(C)	11/04/1965	14/03/1988	14/03/1988	B-11	2008	
11. Shah Muhammad Khan	Haji Malang Khan	Mansehra	DAE(C)/MA	16/04/1965	14/03/1988	14/03/1988	B-11	2006	
12. Salah-ud-Din-I	Muhammad Abdullan	Mansehra	DAE(C)	26/06/1965	14/03/1988	14/03/1988	B-11	2008	
13. Aurangzeb-I	Abdul Marjan	Malakand	DAE(C)	30/03/1966	14/03/1988	14/03/1988	B-11	2010	
14. Jamshed Khan-I	Abdul Hakim	Swabi	DAE(C)	15/04/1967	14/03/1988	14/03/1988	B-11	2008	
15. Habib-Ur-Rehman	Alamgir Khan	Swat	DAE(C)	02/04/1959	15/03/1988	15/03/1988	B-11	2008	
16. Nazeem Ahmed Paracha	Bashir Ahmad	Kohat	DAE(M)	24/04/1960	15/03/1988	15/03/1988	B-11	2008	
17. Nihar Gul	Sher-Gul	Mardan	DAE(C)	07/01/1953	15/03/1988	15/03/1988	B-11	Not cleared	
18. Tariq Hussain Shah	Syed Irfan Shah	Mansehra	DAE(C)	01/04/1964	15/03/1988	15/03/1988	B-11	Not cleared	
19. Muneeb Khan	Jaffar Khan	Mohmand	DAE(C)	16/04/1964	15/03/1988	15/03/1988	B-11	Not cleared	
20. Mumtaz Ahmed Malik	Malik Ali Asghar	Haripur	DAE(C)	08/06/1966	15/03/1988	15/03/1988	B-11	2006	
21. Muhammad Saeed-II	Muhammad Yousaf	Mardan	DAE(C)	03/05/1960	16/03/1988	16/03/1988	B-11	Not cleared	
22. Muhammad Naeem Jan	Mohabat Khan	Charsadda	DAE(E)	15/04/1961	16/03/1988	16/03/1988	B-11	Not cleared	
23. Alamzeb-I	Rehmanullah Khan	Swabi	DAE(C)	01/03/1963	16/03/1988	16/03/1988	B-11	2006	
24. Syed Azmat Ali Shah	Wahid Ali Shah	Mansehra	DAE(C)	15/12/1963	16/03/1988	16/03/1988	B-11	2006	

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Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
109	Amullah-III	Haji Shalozan	NWA	DAE(C)	01/01/1964	16/03/1988	16/03/1988	B-11	
110	Mashal Khan	Bagu Khan	Lakki	DAE(C)	02/02/1964	16/03/1988	16/03/1988	04/09/2003	2008
111	Muhammad Shaukat	Abdur Rehman	Mansehra	DAE(E)	12/02/1964	16/03/1988	16/03/1988	B-11	
112	Abdul Saboor Khan	Abdul Nazir Khan	Swabi	DAE(E)	16/07/1964	16/03/1988	16/03/1988	B-11	2006
116	Ali Rehman	Abdul Qader	Malakand	DAE(C)	12/11/1954	16/03/1988	16/03/1988	B-11	2010
117	Rehman Saeed	Noor Baig	Karak	DAE(M)	15/01/1965	16/03/1988	16/03/1988	B-11	
118	Muhammad-Ajmal	Ghulam-Mustafa Khan	Mansehra	DAE(C)	05/03/1965	16/03/1988	16/03/1988	B-11	2010
119	Muhammad Zaka Khan	Muhammad Younis Khan	Abbottabad	DAE(C)	19/04/1965	16/03/1988	16/03/1988	B-11	2008
120	Muhammad Fahim A'am	Inayat Khan	Malakand	DAE(E)	14/04/1955	17/03/1988	17/03/1988	B-11	
121	Faizullah Khan-II	Abdur Rahim	Lakki	DAE(C)	02/03/1959	17/03/1988	17/03/1988	B-11	2008
122	Muhammad Irshad Khan	Rahmat Khan	Harpur	DAE(E)	12/04/1959	17/03/1988	17/03/1988	B-11	
123	Saifur Rehman-II	Khanan Khan	SWA	DAE(C)	05/02/1960	17/03/1988	17/03/1988	B-11	2010
124	Imtiaz Khan	Amir Zaman Khan	Bannu	DAE(C)	10/04/1960	17/03/1988	17/03/1988	B-11	2006
125	Abdullah Khan	Abdul Jamher	Bannu	DAE(C)	12/04/1961	17/03/1988	17/03/1988	B-11	Not cleared
126	Rohar Muhammad	Muhammad Islam	Malakand	DAE(C)	30/04/1961	17/03/1988	17/03/1988	B-11	Not cleared
127	Muhammad Naeem-III		Peshawar	DAE(C)	16/04/1962	17/03/1988	17/03/1988	B-11	
128	Akbar Ali	Muhammad Akbar	Charsadda	DAE(C)	11/03/1953	17/03/1988	17/03/1988	B-11	
129	Gul Khitab	Wilayat Khan	Mansehra	DAE(C)	25/04/1963	17/03/1988	17/03/1988	B-11	
130	Syed Jaffar Shah	S. Bahader Shah	Abbottabad	DAE(C)	01/02/1964	17/03/1988	17/03/1988	B-11	Not cleared
131	Shah Tamas Khan	Israr Khan	Bannu	DAE(C)	30/03/1964	17/03/1988	17/03/1988	B-11	
132	Muhammad Hayat	Luqman Hakim	Charsadda	DAE(C)	10/05/1964	17/03/1988	17/03/1988	B-11	2008
133	Muhammad Jamil-II	Amanullah	Mansehra	DAE(C)	12/05/1964	17/03/1988	17/03/1988	B-11	Not cleared
134	Ghulam Jalil	Yaqoob Khan	Chitral	DAE(C)	10/01/1958	19/03/1988	19/03/1988	B-11	
135	Khan Badshah	Jan Amir	Malakand	DAE(C)	10/10/1960	19/03/1988	19/03/1988	B-11	2008

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26/5

12

Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
138 Zoor Ahmed	Dawa Khan	Swat	DAE(C)	23/03/1951	19/03/1988	19/03/1988	B-11	Not cleared	
139 Rafiq Ahmed	Mian Said Wahid	Swat	DAE(C)	27/11/1961	19/03/1988	19/03/1988	B-11		
140 Muhammad Ishaq	Hayat Khan	Lakki	DAE(E)	17/01/1962	19/03/1988	19/03/1988	B-11		
141 Hamidullah Khan-II	Muhammad Jan	Lakki	DAE(C)	01/01/1963	19/03/1988	19/03/1988	B-11		
142 Muhammad Iqbal-iv	Muhammad Afzal	Ballagram	DAE(C)	20/03/1964	19/03/1988	19/03/1988	B-11	Not cleared	
143 Tanq Muhammad	Gul Muhammad Khan	Swabi	DAE(C)	15/04/1964	19/03/1988	19/03/1988	B-11	Not cleared	
144 Abdul Farooq	Muhammad-Ramzan Khan	DI Khan	DAE(C)	24/04/1964	19/03/1988	19/03/1988	B-11	1996	
145 Fida Muhammad	Taj Din	Mansehra	DAE(C)	13/12/1964	19/03/1988	19/03/1988	B-11	2006	
146 Muhammad Niaz	Abdur Rahman	Abbottabad	DAE(C)	24/03/1965	19/03/1988	19/03/1988	B-11	2011	
147 Noor Zeb	Mir Sadad Khan	Bannu	DAE(E)	10/04/1965	19/03/1988	19/03/1988	B-11	2006	
148 Muhammad Abdul Khair	Khan Sher	Mohmand	DAE(C)	07/10/1965	19/03/1988	19/03/1988	B-11	Not cleared	
149 Mushtaq Ahmed-ii	Muzaffar Khan	DI Khan	DAE(E)	20/05/1966	20/03/1988	20/03/1988	B-11	2006	
150 Ajmal Khan-I	Muhammad Hanan Khan	Nowshera	DAE(M)	01/05/1960	20/03/1988	20/03/1988	B-11	2006	
151 Pir Aftab Ali Shah	Muhammad Ishaq Shah	SWA	DAE(C)	01/04/1961	20/03/1988	20/03/1988	B-11	2008	
152 Muhammad Yaqoob-II	Hayat Zahid Khan	DI Khan	DAE(C)	02/02/1963	20/03/1988	20/03/1988	B-11		
153 Imtiaz Ali Khan	Farmanullah	Nowshera	DAE(C) B Tech (C) Pass	10/03/1963	20/03/1988	20/03/1988	B-11	2008	
154 Asmatullah Khan-II	Hamidullah Khan	Tank	DAE(C)	23/03/1964	20/03/1988	20/03/1988	B-11		
155 Salim Khan-III	Multan Khan	Charsadda	DAE(C)	03/09/1964	20/03/1988	20/03/1988	B-11	2008	
156 Luqman Tariq	Khani Gul	FR Bannu	DAE(C)	24/05/1967	20/03/1988	20/03/1988	B-11	2008	
157 Misal Khan-II	Yousaf Khan	FR Lakki	DAE(E)	22/02/1961	22/03/1988	22/03/1988	04/09/2003	2005	
158 Muhammad Saeed Kamal	Muhammad Laj Khan	Mansehra	DAE(C)	24/04/1960	22/03/1988	22/03/1988	B-11		
159 Hidayatullah-II	Amanullah Khan	Tank	DAE(M)	20/03/1963	22/03/1988	22/03/1988	B-11	2006	
160 Syed Ali Raza Gillani	M. Ahmad Gillani	Peshawar	DAE(E)	01/10/1966	22/03/1988	22/03/1988	B-11	2008	
161 Muhammad Iqbal-V	Awal Khan	Lakki	DAE(C)	22/01/1964	24/03/1988	24/03/1988	B-11		

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26/5

No.	Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
	Syed Ashiq Hussain	S. Shah Abas	Kurrām	DAE(C)	03/04/1962	26/03/1988	26/03/1988	B-11		ATTESTED TO BE TRUE COPY
151	Faisal Saeed	Muhammad Aslam	Mardan	DAE(C)/VA B.Tech (C) PAs	02/11/1962	28/03/1988	28/03/1988	B-11	2008	
152	Sardar Naeem Ahmad	Gulzar Ahmad	Abbottabad	DAE(C)	11/11/1958	30/03/1988	30/03/1988	B-11	2008	
163	Sardar Bahadar	Khan Bahadar	Peshawar	DAE(C)	02/09/1960	16/05/1989	16/05/1989	B-11		Completed in Accounts & Prof.
164	Muhammad Kamal	Hazrat Jamal	Mardan		03/04/1962	13/01/1988	13/01/1988	B-11		
165	Saidul Ibrar	Saeedullah	Charsadda	DAE(C)	18/11/1960	10/08/1982	07/04/1990	B-11	2006	Seniority fixed from the date of acq: Diploma and as per Inter-s-seniority
166	Azmat-Elahi-Malik	Manzoor Elahi-Malik	Peshawar	DAE(C)	03/10/1957	17/10/1952	07/04/1990	B-11		Seniority fixed from the date of acq: Diploma and as per Inter-s-seniority
167	Syed Sardar Shah	Sabirin Shah	Kohat	DAE(C)	05/01/1957	17/04/1952	01/04/1990	4/9/2003	2006	Seniority fixed from the date of acq: Diploma and as per Inter-s-seniority Selection Grade granted on the decision of Khyber Pakhtunkhwa Service Tribunal.
168	Abdur Rauf Babar	Muhammad Ashoor Babar	Nowshera	Matric	29/01/1956	24/02/1977	31/05/1990	B-11		Seniority fixed from the date of acq: Diploma and as per Inter-s-seniority
169	Muhammad Tariq-III	Ghulam Sadiq	DI.Khan	DAE(C)	14/08/1966	07/12/1990	07/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
170	Mudasar Shah	Musharat Khan	Charsadda	DAE(C)	04/04/1965	22/12/1990	22/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
171	Fayyaz Gul-II	Qader Gul	Mardan	DAE(C)	11/02/1957	23/12/1990	23/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
172	Alam Zeb-II	Mehar-Muhammad	Mardan	DAE(C)	19/09/1963	12/12/1990	12/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
173	Muhammad Tahir	Karim Khan	Nowshera	B.A/DAE(C)	03/03/1958	20/12/1990	20/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
174	Sageer-ud-Din	Wahabudin	Nowshera	DAE(C)	05/02/1963	29/12/1990	29/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
175	Hayat Ullah Khan	Muhammad Khan	Bannu	DAE(C)	27/07/1965	12/12/1990	12/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
176	Aurangzeb-VI	Jaffar Hussain	Peshawar	B.Sc/DAE(C) B.Tech (C) (Pass)	21/05/1964	13/05/1987	20/12/1990	E-11	1997	Presenting service with PHEQ as Sub-Engineer. Seniority fixed as per merit order assigned by the NWFP PSC in C&W Cadre
177	Syed Yaqoot Jan	Syed Muslim	Orakzai	BA/DAE(C)	15/02/1963	20/12/1990	20/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
178	Muhammad Rashid Butt	Mukhtiar Butt	DI.Khan	DAE(C)	02/10/1964	06/12/1990	06/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
179	Aurangzeb-IV	Mohabat Khan	Mansehra	F.Sc/DAE(C)	09/04/1965	16/12/1990	16/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
180	Muhammad Rafiq Shinwan-II	Abdur Rauf	Malakand	DAE(C)	15/04/1964	12/12/1990	12/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
181	Niamatullah-I	Abdul Ghaffar	Lakki	DAE(C)	10/03/1966	06/12/1990	06/12/1990	B-11	2011	Seniority fixed as per merit order assigned by the NWFP PSC
182	Azhar Ali	Farzand Ali	Peshawar	DAE(C)	28/10/1966	15/12/1990	15/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
183	Muhammad Iqbal-VI	Bakht-Rokhan	Swat	DAE(M)	01/12/1968	20/12/1990	20/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC

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-14- 18

Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to P.W.D.	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
Nasser Khan	Zarab Din	Karak	DAE(C)	02/01/1967	08/12/1990	08/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
Rehman	Aziz Khan	NWA	DAE(C)	13/09/1952	12/12/1990	12/12/1990	B-11	2006	Seniority fixed as per merit order assigned by the NWFP PSC
Malook	Aqal Jan	FR Bannu	DAE(C)	17/12/1963	12/12/1990	12/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Azam	Taza Khan	Mardan	DAE(C)	07/11/1969	16/12/1990	16/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Shaukat Ali	Serdar Bagga Khan	Abbottabad	DAE(C)/S. Tech. (C) Pass	01/12/1957	12/12/1990	12/12/1990	B-11	Company Account	Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Fiaz Ahmed	Muhammad Miskeen	Haripur	DAE(C)	10/09/1966	22/12/1990	22/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Javed Khan-III	Karim Abdullah Khan	Haripur	DAE(C)	01/05/1959	27/12/1990	27/12/1990	B-11	Not cleared	Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Rasool Khan	Tajbar Khan	Dir Lower	DAE(C)	06/01/1962	18/12/1990	18/12/1990	B-11	2006	Seniority fixed as per merit order assigned by the NWFP PSC
Nekzada	Shahzada	Bajaur	DAE(C)	04/05/1964	17/12/1990	17/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Damar Zaman	Aji Zaman	Kurram	DAE(E)	06/02/1965	08/12/1990	08/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Hashim Khan	Hussain Afzal	Khyber	DAE(C)	20/01/1964	22/12/1990	22/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
Fazal Wahid	Ajab Gul	Malakand	DAE(E)	03/02/1965	16/12/1990	16/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Sultan Zeb	Gulab Shah	Bajaur	DAE(C)	02/03/1965	13/12/1990	13/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
Zewar Gul	Haji Gul Zaman	Mohmand	DAE(C)	10/10/1965	10/12/1990	10/12/1990	B-11	2006	Seniority fixed as per merit order assigned by the NWFP PSC
Ghaniullah	Abdul Elahi	NWA	DAE(C)	27/02/1966	12/12/1990	12/12/1990	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Haroon Qaisar	Malik Aman	Mansehra	DAE(C)	12/12/1964	22/12/1990	22/12/1990	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Waqar Ahmed	Muhammad Farid	Mansehra	DAE(C)	01/02/1963	07/12/1990	07/12/1990	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Jamshed Khan-II	Jamdad Khan	Bajaur	DAE(C)	15/03/1971	04/07/1994	04/07/1994	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Khiyal Muhammad	Sher Muhammad	Swabi	DAE(C)	05/12/1972	28/06/1994	28/06/1994	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Farooq Sarwar Baluch	Ghulam Sarwar Baloch	DI Khan	DAE(C)	12/09/1968	28/06/1994	28/06/1994	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Tariq Hussain	Muhammad Yousaf	Malakand	DAE(C)	01/03/1969	28/05/1994	28/06/1994	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
Abid Hussain-II Bangash	Muhammad Younas	Kurram	DAE(C)	02/04/1965	30/06/1994	30/06/1994	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Masoor Khan	Walid Khan	Abbottabad	DAE(C)	04/04/1973	04/07/1994	04/07/1994	B-11	2010	Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Shaid Iqbal	Muhammad Akbar	Haripur	DAE(C)	08/12/1972	03/07/1994	03/07/1994	B-11		Seniority fixed as per merit order assigned by the NWFP PSC
Taseer Anwar	Anwar Gul	Mohmand	DAE(C)	25/12/1971	27/06/1994	27/06/1994	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Rokhan Gul Khattak	Raj Khan Gul	Karak	DAE(C)	01/01/1971	30/04/1995	30/04/1995	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC
Muhammad Zaher	Khalifa	Abbottabad	DAE(C)	09/04/1971	23/04/1995	23/04/1995	B-11	2008	Seniority fixed as per merit order assigned by the NWFP PSC

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15

Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to BWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
Attaullah Khan-II	Nizam Khan	SWA	DAE(C)	06/05/1967	27/04/1995	27/04/1995	B-11		Appointed as per merit order assigned by the NWFP PSC
Abdus Amin	Muhammad Amin	Abbottabad	DAE(C)	04/05/1970	23/04/1995	23/04/1995	B-11	2010	Appointed as per merit order assigned by the NWFP PSC
Aswar Ali	Shah Said	Swabi	DAE(C)	06/03/1963	28/08/1988	13/10/1999	B-11	2006	Promotee, Inter-seniority In tact
Muhammad Ayaz Khan	Nauroz Khan	Peshawar	DAE(C)	03/04/1962	15/05/1989	20/10/1999	B-11		Promotee, Inter-seniority In tact
Ghulam Sarwar	Faiz Muhammad	DI.Khan	DAE(C)	02/03/1960	02/08/1989	20/10/1999	B-11	2006	Promotee, Inter-seniority In tact
Pir Attaullah	Said Ahmad	Mardan	DAE(C)	01/04/1963	01/10/1989	12/10/1999	B-11		Promotee, Inter-seniority In tact
Ghulam Murtaza	Ghulam-Mustafa	Peshawar	DAE(M)	01/04/1958	01/04/1990	20/10/1999	B-11		Promotee, Inter-seniority In tact
Ajmal Khan-II	Bashi Khan	Peshawar	DAE(C)	01/05/1964	05/09/1990	20/10/1999	B-11	2006	Promotee, Inter-seniority In tact
Inamullah Khan-II	Muhammad Akram Khan	Nowshera	DAE(C)	01/04/1967	27/04/1992	12/10/1999	B-11		Promotee, Inter-seniority In tact
Anees Kalim	Abdul Rab Kalim	Swabi	BA/DAE(C)	30/03/1964	17/06/1997	15/10/1999	B-11	2006	Promotee, Inter-seniority In tact
Mohibullah	Abdullah Khan	DI.Khan	DAE(C)	31/12/1952	02/04/1988	11/05/2005	B-11		Promotion, Inter-seniority In tact
Jawad Aemir	Muhammad Ikram	Mardan	DAE(C)	23/10/1982	01/08/2006	01/08/2006	B-11		Appointed under deceased's son quota
Mian Tahir Shah	Mian Abdul Chafoor Shah	Swabi	DAE(C)	05/09/1957	01/09/1982	01/10/2006	B-11		Service wd 01/09/1982 to 30/09/2006 as Road Inspector
Rafiqullah	Madal Nawaz Khan	Bannu	DAE(C)	15/03/1963	25/07/1985	01/10/2006	B-11	Not cleared	Service wd 25/07/1985 to 30/09/2006 as Road Inspector
Abdul Naseer	Abdul Hayee	Mansehra	DAE(C)	25/04/1955	25/01/1986	01/10/2006	B-11		Service wd 25/01/1986 to 30/09/2006 as Road Inspector
Sikandar Javed	Abdul Rehman	DI.Khan	DAE(C)	12/02/1953	05/03/1986	01/10/2006	B-11	Not cleared	Service wd 05/03/1986 to 30/09/2006 as Road Inspector
Zia ul Haq	Manzoor Hussain	Swat	DAE(C)	01/07/1966	06/03/1986	01/10/2006	B-11		Service wd 06/03/1986 to 30/09/2006 as Road Inspector
M. Ihsan Rafiq	M. Rafiq Ahmad	Kohat	DAE(C)	28/05/1959	01/06/1986	01/10/2006	B-11	Compare Accounts & Vva	Service wd 01/06/1986 to 30/09/2006 as Road Inspector
Sami-ud-Din Shah	Saharud Din Shah	Kohat	DAE(C)	28/10/1966	24/11/1985	01/10/2006	B-11	2011	Service wd 24/11/1985 to 30/09/2006 as Road Inspector
Inayatullah	Attaullah	Lakki	DAE(C)	03/05/1969	03/04/1987	01/10/2006	B-11	2010	Service wd 03/04/1987 to 30/09/2006 as Road Inspector
Fariq Hussain-II	Mian Badshah	Swat	DAE(C)	10/01/1965	13/08/1987	01/10/2006	B-11	2010	Service wd 13/08/1987 to 30/09/2006 as Road Inspector
Raj Muhammad	Chamba Gul	Kohat	DAE(C)	01/11/1962	07/11/1987	01/10/2006	B-11	Compare Accounts & BAR Code	Service wd 07/11/1987 to 30/09/2006 as Road Inspector
Muhammad Arif	Ghulam Akbar	DI.Khan	DAE(C)	01/01/1963	21/08/1988	01/10/2006	B-11		Service wd 21/08/1988 to 30/09/2006 as Road Inspector
Niaz Muhammad-II	Ajab Khan	Battagram	DAE(C)	06/04/1959	07/03/1990	01/10/2006	B-11		Service wd 07/03/1990 to 30/09/2006 as Road Inspector
Pir Amanullah	Pir Ahmad Shah	Mardan	DAE(C)	01/04/1961	19/04/1990	01/10/2006	B-11		Service wd 19/04/1990 to 30/09/2006 as Road Inspector
Shamsul Qamar	Abdur Rab	Orakzai	DAE(C)	04/01/1965	30/11/1989	01/10/2006	B-11	2010	Service wd 10/11/1989 to 30/09/2006 as Road Inspector

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-16- (2)

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Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
237	Shafiqullah	Hamidullah Khan	Tank	DAE(C)	03/05/1959	01/09/1990	01/10/2006	B-11	Not cleared
238	Saleemullah-II	Amanullah Khan	Di. Khan	DAE(C)	08/04/1964	16/03/1991	01/10/2006	B-11	Service w.e.f. 16/03/1991 to 30/09/2005 as Road Inspector
239	Sajjad Ali-II	Muhammad Saleem Khan	Dir Lower	DAE(C)	01/04/1970	02/06/1994	01/10/2006	B-11	Service w.e.f. 02/06/1994 to 30/09/2005 as Road Inspector
240	Imdad Hussain	Jawad Hussain	Kohat	DAE(C)	10/04/1974	01/01/1995	01/10/2006	B-11	2010 Service w.e.f. 01/01/1995 to 30/09/2006 as Road Inspector
241	Zahidullah Khan	Saadullah Khan	Kohat	DAE(C)	20/10/1974	3/7/1995	01/10/2006	B-11	2010 Service w.e.f. 03/07/1995 to 30/09/2006 as Road Inspector
242	Naik Muhammad	Abdul Haleem	Kurram	DAE(C)	14/01/1969	25/10/1995	01/10/2006	B-11	2010 Service w.e.f. 25/10/1995 to 30/09/2006 as Road Inspector
243	Fida Hussain	Gul Baz Khan	Kurram	DAE(C)	22/04/1969	28/10/1995	01/10/2006	B-11	2010 Service w.e.f. 28/10/1995 to 30/09/2006 as Road Inspector
244	Shakir Kamal	Kamal Khan	Kohat	DAE(C)	01/03/1969	07/11/1995	01/10/2006	B-11	2010 Service w.e.f. 07/11/1995 to 30/09/2006 as Road Inspector
245	Shakeel Hussain	M. Yousaf Khan	Kurram	DAE(C)	11/04/1971	07/11/1995	01/10/2006	B-11	2010 Service w.e.f. 07/11/1995 to 30/09/2006 as Road Inspector
246	Ibrar Hussain	Haji Ahmad Ali	Kurram	DAE(C)	18/04/1972	17/12/1995	01/10/2006	B-11	2010 Service w.e.f. 17/12/1995 to 30/09/2006 as Road Inspector
247	Inamullah Khan	Haji Abdul Ghaffer	Di. Khan	DAE(C)	01/12/1969	05/05/1996	01/10/2006	B-11	2010 Service w.e.f. 05/05/1996 to 30/09/2006 as Road Inspector
248	Shabir Khan	Sharif Khan	Hangu	DAE(C)	05/01/1972	03/03/1995	01/10/2006	B-11	2010 Service w.e.f. 03/03/1995 to 30/09/2006 as Road Inspector
249	Sajjad Ahmad	M. Yaqoob Khan	Mansehra	DAE(C)	09/03/1967	07/05/1996	01/10/2006	B-11	2010 Service w.e.f. 07/05/1996 to 30/09/2006 as Road Inspector
250	Sabir Hussain	Safdar Hussain	Khyber	DAE(C)	01/01/1956	02/12/1991	01/10/2006	B-11	2010 Service w.e.f. 01/01/1997 to 30/09/2006 as Road Inspector
251	Khanzad Gul	Haji Khair Gul	FR Kohat	DAE(C)	20/09/1966	04/10/1997	01/10/2006	B-11	2010 Service w.e.f. 04/10/1997 to 30/09/2006 as Road Inspector
252	Akhtar Gul	Khial Gul	FR Kohat	DAE(C)	15/01/1972	04/10/1997	01/10/2006	B-11	2011 Service w.e.f. 04/10/1997 to 30/09/2006 as Road Inspector
253	Muhammad Naeem-V	M. Aisar Khan	Mansehra	DAE(C)	01/04/1972	01/09/1992	01/10/2006	B-11	2011 Service w.e.f. 01/09/1992 to 30/09/2006 as Road Inspector
254	Adnan Khan	Shamshad Khan	Mardan	DAE(E)	10/04/1961	02/03/2007	02/03/2007	B-11	Completed Professional Appointed under deceased's son quota
255	Aamir Aziz	Hajeemullah	NWA	DAE(E)	03/04/1965	02/03/2007	02/03/2007	B-11	Appointed under deceased's son quota
256	Mian Mushlaq ur Rehman	Mian Khalil ur Rehman	Bannu	DAE (M)	04/10/1958	11/11/1986	24/05/2007	B-11	Not cleared Service w.e.f. 11/12/1986 to 23/05/2007 as Estemeter with Pak-PWD. Absorbed in W&SD w.e.f. 24/05/2007 in DSC meeting held on 02/05/2007.
257	Muhammad	Gul Zamin Khan	Peshawar	DAE(M)	12/02/1956	04/09/1991	01/04/2008	B-11	2011 Promoted from the post of Draftsman. Inter-se-seniority kept intact
258	Rahmat Ali	Gul Nawaz	Bannu	DAE (C)	05/10/1970	19/02/1995	01/04/2008	B-11	2011 Promoted from the post of Tracers. Inter-se-seniority kept intact
259	Shahid Ali Shah	Pir Sarwar Shah	Bannu	DAE (C)	05/03/1973	26/03/1995	01/04/2008	B-11	Not cleared Promoted from the post of Tracers. Inter-se-seniority kept intact
260	Zaheer Ahmad	Manzoor Ahmad	Abbottabad	DAE(M)	24/08/1968	22/03/1995	01/04/2008	B-11	2011 Promoted from the post of Tracers. Inter-se-seniority kept intact
261	Niaz Muhammad-III	Muhammad Ghaffar	Shangla	DAE(M)	20/01/1971	30/04/1995	01/04/2008	B-11	2011 Promoted from the post of Tracers. Inter-se-seniority kept intact
262	Jehanzeb Shah	Aurengzeb Shah	SWA	DAE(C)	15/01/1980	10/05/2009	10/05/2009	B-11	2011 Appointed under deceased's son quota
263	Sheraz Jamshed	Aamir Jamshed	Dir Lower	DAE(C)	19/09/1979	14/01/2011	14/01/2011	B-11	2011 Appointed under deceased's son quota

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S.No	Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
256	Muhammad Jamshaid Iqbal	Buland Iqbal	D.I.Khan	DAE(C)	07/04/1982	14/01/2011	14/01/2011	B-11	-	Appointed under deceased's son quota
255	Syab Ali	Farman Ali	Malakand	DAE(C)	13/12/1988	14/01/2011	14/01/2011	B-11	-	Appointed under deceased's son quota
266	Afnan Jamshaid	Jamshaid Khalil	Bannu	DAE(C)	10/04/1989	14/01/2011	14/01/2011	B-11	-	Appointed under deceased's son quota
267	Ziaullah Shah	Inayatullah Shah	NWA	DAE(C)	16/03/1991	14/01/2011	14/01/2011	B-11	-	Appointed under deceased's son quota
268	Hussain Nazir Kazmi		Haripur	DAE(C)	01/06/1960	15/07/1982	01/04/2011	B-11	-	Promoted from the post of Draftsman.
269	Mr. Faheem Ullah Khan	Akhtar Zaman	Bannu	BA DAE(C)	21/09/1981	07/05/2005	01/04/2011	B-11	-	Promoted from the post of Work Supervisor
270	Mr. Tahir Zaman	Fazal Rehman	D.I.Khan	DAE(M)	10/2/1957	30/11/1995	01/04/2011	B-11	-	Promoted from the post of Superintendent (Mechanical)
271	Tariq Ali	Mazhar Ali	Abbottabad	DAE(E)	04/10/1976	03/12/1995	01/04/2011	B-11	-	Promoted from the post of Superintendent (E&M)
272	Zulfiqar Ali	Rahim Khan	FR Bannu	DAE(M)	22/01/1965	13/12/1986	01/04/2011	B-11	-	Promoted from the post of Supervisor.
273	Rabnawaz Khan	Wazir Muhammad	Mardan	DAE(M)	02/05/1972	05/05/1994	01/04/2011	B-11	2011	Promoted from the post of Supervisor.
274	Fazal-e-Rabi	Ghulam Sarwar	Peshawar	DAE(M)	20/04/1968	12/09/1961	01/04/2011	B-11	-	Promoted from the post of Supervisor
275	Ayaz Hussain Shah	S.Faqir Shah	Peshawar	S.S.C	28/09/1964	05/03/1985	01/04/2011	B-11	-	Promoted from the post of Superintendent (E&M)
276	Muhammad Jehangir	Tajamal Hussain	Peshawar	S.S.C	01/05/1957	03/05/1981	01/04/2011	B-11	-	Promoted from the post of Work Supervisor.
277	Khurram Ayaz	Ayaz Ahmad	Swabi	DAE(C)	18/02/1990	01/01/2012	01/01/2012	B-11	-	Appointed under deceased's son quota
278	Ahmad Ali	Afsar Khan	Bannu	DAE(C)	04/05/1993	01/01/2012	01/01/2012	B-11	-	Appointed under deceased's son quota
279	Tila Muhammad	Sahib Jan	Lakki	DAE(C)	08/02/1979	07/06/2012	07/05/2012	B-11	-	Appointed under deceased's son quota
280	Ghais-ud-Din	Musharaf Khan	NWA	DAE(C)	05/04/1984	07/05/2012	07/05/2012	B-11	-	Appointed under deceased's son quota
281	Muhammad Arif	Gul Muhammad	Malakand	DAE(C)	23/03/1986	01-09-2014	01-09-2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
282	Aftab Muhammad	Taj Muhammad	Charsadda	DAE(C)	03/03/1991	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
283	Misbah Ullah	Muhammad Zahir Shah	Mohmand	DAE(C)	13/04/1991	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
284	Niaz Muhammad	Taseer Khan	Dir Lower	DAE(C)	03/03/1992	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
285	Rameez Gul	Tameez Gul	Nowshera	DAE(C)	10/04/1992	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
286	Sher Hayat	Ilyas Khan	Karak	DAE(C)	01/01/1974	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
287	Sanaullah	Aam Khan	Charsadda	DAE(C)	12/03/1993	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
288	Rasool Nawaz	Mian Khan	NWA	DAE(C) + B.Sc Science	12/04/1988	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission
289	Shah Faisal Khan	Fazli Haq	FR Bannu	DAE(C)	05/03/1991	01/09/2014	01/09/2014	B-11	-	Security Guard as per merit order assigned by the Khyber Pakhtunkhwa Public Service Commission

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18

Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
Subhan Ali	Sher Bali	Mardan	DAE(C)	26/03/1993	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Abdul Jamil	Abdul Hameed	Lakki Marwat	DAE(C)	01/04/1981	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Anwar Badshah	Shamsul Wahid	Malakand	DAE(C)	04/01/1990	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Ijaz Ali	Shah Room	Malakand	DAE(C)	10/03/1991	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Sana Ullah	Syed Ghulam	Bannu	DAE(C)	15/03/1991	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Abdul Jalal	Khyal Bacha	Mohmand	DAE(C)	06/02/1991	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Ibraheem	Muhammad Saleem	Mansehra	DAE(C)	12/11/1984	01/09/2014	01/09/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Afzal Khan	Haibat Khan	Mansehra	DAE(C)	05/10/1990	01/01/2014	01/01/2014	B-11	...	Selected by the Commission under assigned by the Khyber Pakhtunkhwa Public Service Commission
Ashiq Muhammad	Arsala Khan	S.W.A.	B.A.	03/07/1959	06/07/1974	14/01/2015	B-11	...	Promoted from the post of Road Inspector
S. Tahir Ali Shah	S. Safdar Ali Shah	Peshawar	Matric	27/05/1957	01/11/1977	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Mr. Akbar Ali	Mian Hazrat Jamal	Swat	Matric	07/02/1957	09/05/1979	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Maqbool Hussain	Gharib Ali	Kohat	F.A.	05/11/1957	29/11/1980	14/01/2015	B-11	...	Promoted from the post of Superintendent (E&M)
Asmat Ullah	Muhammad Hashim Khan	Bannu	(i) Matric (ii) DAE (M)	08/02/1957	05/04/1981	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Younas Khan	Hassan Khan	Peshawar	Matric	15/03/1965	03/04/1982	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Waheed Murad	Reza Din	N.W.A.	F.A.	25/11/1956	01/12/1982	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Muzamil Shah	Bara Khan	S.W.A.	Matric	16/06/1965	01/02/1983	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Khadim Hussain	Ali Hussain	Kurram Agy.	Matric	02/05/1956	01/04/1985	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Zulfiqar Ullah Khan	Mahboob Khan	Nowshera	Matric	25/04/1961	01/01/1986	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Muhammad Anwar	Muhammad Sadiq	D.I. Khan	(i) Matric (ii) DAE (M)	07/02/1964	22/10/1986	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Mr. Noor Shad Khan	Shamshad Khan	Peshawar	B.A.	17/03/1964	07/01/1987	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Syed Ahmad Shah	S. Muhammad Shoaib	Dir Lower	F.A.	26/03/1965	20/01/1987	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Shamsher Ali	Mian Hazrat Room	Swat	F.A.	20/04/1963	03/08/1987	14/01/2015	B-11	...	Promoted from the post of Road Inspector
Javed Khan	Muhammad Zarif Khan	Khy. Agy.	B.A.	01/05/1964	25/02/1988	14/01/2015	B-11	...	Promoted from the post of Work Supervisor
Ahmad Khan	Ahmad Shah	Peshawar	M.A.	02/03/1965	01/03/1988	14/01/2015	B-11	...	Promoted from the post of Work Supervisor

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Reference to Section 8 (1) and (5) of the Khy
C&WD/8-12/2009 dated. 25/03/2010

19 **(2)**

Name of Official	Father's Name	Home District	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Date of Grant of BS-16	Year of Passing prof. exam	Remarks
14. Usar Ali	Zawar Ali	Kurram Agy	F A	10/03/1959	01/10/1988	14/01/2015	B-11		Promoted from the post of Road Inspector
15. Aslam Khan	Abdullah Khan	Mjakand	(i) B.A (ii) DAE (M)	06/11/1968	29/09/1991	14/01/2015	B-11		Promoted from the post of Road Inspector
16. Asifullah Khan	Faizullah Khan	D.I. Khan	(i) Metric (ii) DAE (E)	07/04/1965	14/03/1992	14/01/2015	B-11		Promoted from the post of Road Inspector
17. Sultan Mehmood	Zarif Khan	Kohat	(i) F.A (ii) DAE (E)	07/05/1968	01/08/1992	14/01/2015	B-11		Promoted from the post of Road Inspector
18. Amirullah Khan	Gul Payozad Khan	Bannu	(i) Metric (ii) DAE (M)	27/03/1967	29/06/1995	14/01/2015	B-11		Promoted from the post of Road Inspector
19. Umar Khitab	Muhammad Zaman	Bannu	(i) Metric (ii) DAE (E)	10/01/1970	26/09/1995	14/01/2015	B-11		Promoted from the post of Road Inspector
20. Babar Khan	Zabardast Khan	Kohat	(i) F.A (ii) DAE (M)	01/04/1973	17/09/1995	14/01/2015	B-11		Promoted from the post of Supervisor
21. Hidayat Ullah	Habib Ullah	D.I. Khan	(i) Metric (ii) DAE (M)	13/04/1963	07/06/2002	14/01/2015	B-11		Promoted from the post of Supervisor
22. Yasir Mehmood	Zakir Ullah	Peshawar	(i) Metric (ii) DAE (C)	02/06/1989	24/01/2009	14/01/2015	B-11		Promoted from the post of Superintendant
23. Hamad Pervez	Muhammad Pervez	Peshawar	(i) Metric (ii) DAE (C)	13/03/1990	15/09/2009	14/01/2015	B-11		Promoted from the post of Superintendant

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(Signature)
CHIEF ENGINEER (CENTRE)

- Copy of the above forwarded to:-
1. The Secretary to Govt of Khyber Pakhtunkhwa, C&W Department Peshawar.
 2. The Chief Engineer (North) C&W Department, Peshawar.
 3. The Chief Engineer (CDO) C&W Department, Peshawar.
 4. The Chief Engineer (FATA), W&S Department, Peshawar.
 5. The Chief Engineer (EQAA), C&W Department at Abbotabad.
 6. The Managing Director, Pakhtunkhwa Highways Authority, Peshawar.
 7. Project Director FMR/PMU C&W Department Peshawar.
 8. All the Superintending Engineers in C&W Department Khyber Pakhtunkhwa (i/c FATA).
 9. All the Executive Engineers in C&W Department Khyber Pakhtunkhwa (i/c FATA).

CTC
(Signature)

(Signature)
26/01/15
(ABDUR RASHID TAREEN)
ADMINISTRATIVE OFFICER



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Dated Peshawar, the October 13, 2015

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-20-

NOTIFICATION:

No SOE/C&W/4-2/2015(SDOs) On the recommendations of Departmental Promotion Committee (DPC), the Competent Authority has been pleased to promote the following Diploma Holder Sub Engineers to the post of Assistant Engineers/SDOs (BS-17) of C&W Department on regular basis, with immediate effect.

1. Mr. Muhammad Zubair-I --- On Regular basis
2. Mian Muzakkar Shah --- On Regular basis
3. Mr. Zahir-ur-Rehman --- On Regular basis

2. The officers will be on probation for a period of one year.
3. Consequent upon their promotion as Assistant Engineers/SDOs (BS-17) on regular basis, the Competent Authority is further pleased to order the transfer/posting of the following officers of C&W Department, with immediate effect, in the public interest:

Sl No	Name of Officers	Existing posting	Proposed for actualization/ Adjustment	Remarks
1	Mr. Muhammad Zubair-I (BS-17)	SDO (OPS) Highway Division Mardan	SDO Highway Division Mardan	---
2	Mian Muzakkar Shah (BS-17)	SDO (OPS) Highway FATA Sub Division Bara, Khyber Agency	SDO Highway FATA Sub Division Bara, Khyber Agency	---
3	Mr. Zahir-ur-Rehman (BS-17)	SDO (OPS) C&W Division Tank	SDO C&W Division Tank	---

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Government of Khyber Pakhtunkhwa
Communication & Works Department

Ends of even number and date

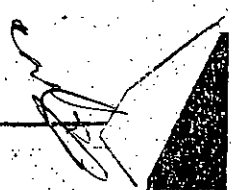
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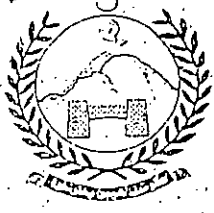
1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Accountant General PR (sub office) Peshawar
3. Secretary Admn, Infrastructure and Coord Department FATA Sectl Warsak Road Peshawar
4. Chief Engineer (Centre/North) C&W Peshawar
5. Chief Engineer (FATA) W&S Peshawar
6. Superntending Engineer C&W Circle Mardan/DIKhan
7. Executive Engineer Highway Division Mardan
8. Executive Engineer C&W Division Tank
9. Executive Engineer Highway FATA Division Khyber Agency
10. District Accounts Officer Mardan/Tank
11. Agency Accounts Officer Khyber Agency
12. Incharge Computer Cell, C&W Department, Peshawar
13. PS to Secretary C&W Peshawar
14. Officers concerned
15. Office order File/Personal File.

CTC
EWA

(USMAN JAN)
SECTION OFFICER (Estb)

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GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

No. SOE/C&WD/4-2/2015
Dated Peshawar, the May 14, 2015

"D" 8 1/2
-21-



TO

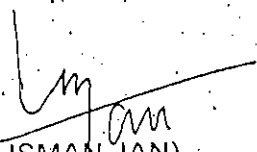
Mr. Zia Jan
Sub Engineer O/O
XEN C&W Division Charsadda

Subject: PROVISION OF ACRs/PERFORMANCE EVALUATION REPORTS

I am directed to refer to the subject noted above and to state that the working paper for promotion of Sub Engineers to the rank of Assistant Engineers/ SDOs (BS-17) is pending for want of provision of your PERs for the following periods:

1. 22.02.1979 to 31.12.2014

2. It is, therefore, requested that the aforesaid PERs may be provided to this Department within a week time positively, so that the case of promotion can be placed before the Departmental Promotion Committee (DPC) for consideration.


(USMAN JAN)
SECTION OFFICER (Estb)

• Ends even No. & date

Copy forwarded to the:

1. Chief Engineer (Centre) C&W, Peshawar
2. PS to Secretary C&W Department

SECTION OFFICER (Estb)

CTC
E/O

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

No. 48179 / CEC / C&WD

Dated Peshawar the 21 / 08 / 2015

-22-

22

To

The Section Officer (Establishment)
C&W Department,
Peshawar.

SUBJECT ANNUAL CONFIDENTIAL REPORTS.

I am directed to enclose herewith Annual Confidential Reports in respect of Mr. Zia Jan Sub Engineer, O/O XEN C&W Division Charsadda for the period from 22-02-1979 to 31-12-2014 for favour of further necessary action.

DA/As above

Administrative Officer

Copy to :-

- 1- Chief Engineer (Centre) C&W Peshawar w/r to his direction dated 20-8-2015.
- 2- Mr. Zia Jan Sub Engineer; O/O XEN C&W Division Charsadda.

Administrative Officer

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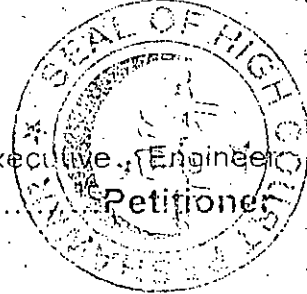
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IN THE PESHAWAR HIGH COURT PESHAWAR.

Writ Petition No. 3210/2017

Zia Jan Sub Engineer, (BPS-16) Office of Executive Engineer
Communication and Works Division Charsadda



VERSUS

1. Govt. of KPK through Secretary, Communication and Works Department, Civil Secretariat Peshawar.
2. Chief Engineer (Centre), Communication and Works Department, Civil Secretariat Peshawar..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN 1973.

Prayer In Writ Petition:-

On acceptance of this writ petition, an appropriate writ may please be issued to the respondents directing them to modify/amend Notification No SOE/C&W/4-2/2015 (SDOs) dated 13-10-2015, to the extent whereby juniors to the petitioner have been promoted as Assistant Engineers/SDOs (BPS-17), deferring the petitioner, thereby including the name of the petitioner and promoting the petitioner as Assistant Engineer/SDO (BPS-17) with effect 13-10-2015, with all back benefits.

Respectfully Submitted:-

1. That the petitioner is highly qualified has passed his BSc, Diploma of Associate Engineer with Bachelor of Civil Technology from the University of Engineering and Technology Peshawar. (Copies of documents are enclosed as Annexure A).

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10 AUG 2017

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EXAMINER
Peshawar High Court
08 DEC 2017

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-24-

2. That the petitioner was appointed as Sub Engineer on 22-02-1979 and remained posted to various Districts including Multineers ram Agency, Abbottabad, Dir etc and was lastly transferred to District Charsadda in the year 2001.
3. That since appointment, the petitioner performed his duties with honesty and full devotion and to the entire satisfaction of his superior officers with no complaint during his entire service career of 38 years.
4. That the name of the petitioner was placed at serial No 2 of the Final Seniority of Diploma Holders, sub Engineers dated 26-08-2015. (Copy of Final Seniority List is enclosed as Annexure B).
5. That in the year 2015, process was initiated for promotion of Sub Engineers (BPS-16) to Assistant Sub Engineers/SDOs (BPS-17) and the petitioner being perfectly fit and eligible and coming up to the criteria was also considered but was deferred for the want of provision of PERs/ACRs for the period from 22-02-197 to 31-12-2014, however Junior to him were considered and promoted including Mian Muzakkar Shah and Zahir-Ur-Rehmani vide Notification dated 13-10-2015. (Copy of Notification dated 13-10-2015 is enclosed as Annexure C).
6. That the petitioner provided his ACRs/PERs to the respondents for the period 22-02-1979 to 31-12-2014 and requested for his promotion as Assistant Engineer/SDO (BPS-17) wef 3-10-2015 but no action has been taken so far despite the lapse of about two years. (Copies of letters ate enclosed as Annexure D).
7. That this action of the respondents of not promoting the petitioner as Assistant Engineer/SDO (BPS-17) w.e.f. 13-10-2015, is against the law, facts and principles of justice on grounds inter alia as follows:

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-25-

GROUNDS:

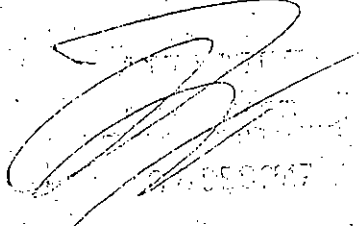
- A. That the omissions and commissions of the respondents are illegal, unconstitutional, and unlawful, without lawful authority and of no legal effect, therefore need the interference of this honorable Court.
- B. That the petitioner has served for about 38 years with spotless service career, is senior, besides having excellent ACRs during this period and as such is perfectly fit and eligible to be promoted as Assistant Engineer/SDO (PS-17) w.e.f. 13-10-2015.
- C. That the petitioner was deferred from promotion as Assistant the petitioner duty provided to the respondents and the reasons of deferment cease to exist but even then the petitioner is not promoted in violation of law and rules on the subject.
- D. That even as per the instructions of the provincial Govt., the petitioner is entitled to proforma promotion wef. 13-10-2015.
- E. That the fundamental rights of the petitioner have been violated guaranteed in the Constitution and respondents are not ready to treat the petitioner as per law and rules on the subject.
- F. That the fundamental rights of the petitioner guaranteed in the Constitution are badly violated and he is not treated as per law and rules governing the matter, he would suffer irreparable loss.
- G. That the petitioner seeks the permission of this honorable Court for further/additional grounds at the time of arguments.

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


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Any other relief not specifically asked for and deemed appropriate in the circumstances of the case, may also be granted in favor of the petitioner.

INTERIM RELIEF

By way of interim relief respondents may kindly be directed to promote the petitioner as Assistant Engineer/SDO (BPS-17) wcf 13-10-2015, till the final disposal of the instant Writ Petition.

Dated: -08-08-2017

Through


Petitioner

Fazal Shah Mohmand
Advocate Peshawar


LIST OF BOOKS

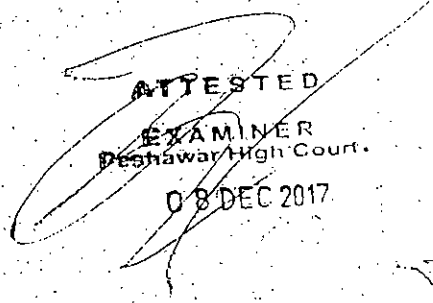
- 1. Constitution 1973.
- 2. Other books as per need

Certificate

Certified that as per instructions of my clients, no Writ petition on the same subject and between the same parties has been filed previously or concurrently before this honorable Court.


ADVOCATE


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EXAMINER
Peshawar High Court.
08 DEC 2017

FILED TODAY
Deputy Registrar
10 AUG 2017

-27-

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

JUDGMENT

W.P. NO. 3210-P/2017 with Interim Relief

Date of hearing: 05-12-2017

Petitioner (Zia Jan) By Mr. Fazal Shah Mohmand, Advocate

Respondents (Government of KP through Secretary C&W, Peshawar and another): By Mr. Muhammad Riaz, A.A.G. along with Mr. Abdur Rashid Tareen, Administrative Officer.



ROOH-UL-AMIN KHAN, J.- Through the petition in hand, Zia Jan, petitioner herein, has asked for the following relief:-

"On acceptance of this writ petition, an appropriate writ may please be issued to the respondents directing them to modify/amend Notification No. SOE/C&W/4-2/2015 (SDOs) dated 13.10.2015, to the extent whereby juniors to the petitioner have been promoted as Assistant Engineers/SDOs (BPS-17), deferring the petitioner, thereby including the name of the petitioner and promoting the petitioner as Assistant Engineer/SDO (BPS-17) with effect 13.10.2015, with all back benefits." (sic)

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02. In essence, the grievance of the petitioners is that by dint of Notification No. SOE/C&W/4-2/2015(SDOs) dated 13.10.2015 respondents/ Department has promoted Sub Engineers (BPS-16) to Assistant Sub Engineers/SDOs (BPS-17) though they are junior to him but he has been deferred.

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Peshawar High Court
08 DEC 2017

03. The learned counsel for the petitioner when confronted with the proposition that the matter of seniority and promotion squarely pertains to the Terms and Conditions of Service wherein the jurisdiction of this Court is barred under Article 212 (2) of the Constitution, he could not wriggle out of such situation. However, he stated that he will not press this petition if the instant Writ Petition is remitted to Respondent No.1 for treating it as Departmental Appeal and decision thereon in accordance with law.

04. Admittedly, the matter involved in this petition pertains to the Terms and Condition of Service, so this Court in the light of clear-cut embargo created by Article 212 (2) of the Constitution of Islamic Republic of Pakistan, 1973 is precluded to entertain such like petitions. However, the request of the petitioner for transmission of this petition to respondent No.1 for treating it as Departmental Appeal is genuine.

05. Accordingly, this Petition is transmitted to Respondent No.1 to treat it as Departmental Appeal and decide the same within stipulated period in accordance with law.

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EXAMINER
Peshawar High Court
08 DEC 2017

This petition is disposed of in the above

terms.

MR Rashed Amin

Announced.
Dated: 05.12.2017.

JUDGE

Muhammad Ghazanfar Khan

JUDGE

DB
Hon'ble Mr. Justice Rosh-ul-Amin Khan
Hon'ble Mr. Justice Muhammad Ghazanfar Khan

Muradullah_PS

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CERTIFIED TO BE TRUE COPY
Peshwar Examiner:
Authorized Under Article 67 of
The Punjab Civil Service (Amendment) Order 1962
08 DEC 2017

3171

No.

Date of Presentation of Application *07/12/17*

No. of Pa. *36*

Copies

Urgent

Totals *36*

Date of Deposition

Date of Delivery of Copy *07/12/17*

Received By *Muhammad Ghazanfar Khan*

20/12/22 DB

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

30

Service Appeal No.7505/2021.

Zia Jan
Sub Engineer (Retired)

Appellant

Versus

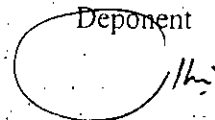
Govt of Khyber Pakhtunkhwa
through Secretary C&W and others

Respondents

INDEX

S.NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Parawise Comments on behalf of Respondent No.1 to 3	-	1-2
2	Affidavit		3
3	Govt of Khyber Pakhtunkhwa C&W Department Notification No.SOE/C&WD/8-12/2014 dated 14-10-2014	I	4
4	Govt of Khyber Pakhtunkhwa C&W Department Departmental Promotion Committee meeting minutes dated 01-09-2015	II	5-6
5	Govt of Khyber Pakhtunkhwa C&W Department letter No.SOE/C&WD/4-2/2015 dated 16-09-2015	III	7
6	Govt of Khyber Pakhtunkhwa C&W Department letter No.SOE/C&WD/8-21/2015 dated 15-02-2018	IV	8

Deponent



Zahid Ullah
Section Officer (Litigation)
C&W Department, Peshawar

Annex 'F'

31

1

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO. 7505 OF 2021**

Mr. Zia Jan, Sub Engineer (Retired) --- Appellant
Office of the XEN C&W-Division Charsadda

Versus

1. Secretary to --- Respondents
Govt of Khyber Pakhtunkhwa
C&W Department, Peshawar

2. Chief Engineer (Centre)
C&W Department

3. Chief Secretary
Govt of Khyber Pakhtunkhwa
Peshawar

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1, 2 & 3


Respectfully Sheweth;

PRELIMINARY OBJECTIONS:-

1. That the appeal is not maintainable for mis-joinder and non-joinder of necessary parties.
2. That the appellant has never challenged-in time any order in which his rights were alleged to be ignored.
3. That the appeal is premature.
4. That the appellant has got no cause of action and no locus standi to file the instant appeal.
5. That the appeal is time barred.

FACTS

1. Pertains to record, needs no comments.
2. Pertains to record, needs no comments.
3. Pertains to record, needs no comments.
4. Pertains to record, needs no comments.
5. Incorrect. According to the recruitment rules of C&W Department notified on 25.03.2010 which were amended on 14.10.2014, the method of recruitment for the post of Assistant Engineer/SDO is as under (**Annex-I**):
 - a. Sixty five percent (65%) by initial recruitment;
 - b. twenty percent (20%) 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. eight percent (8%) 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;


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- 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. three and half percent (3.5%) 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"

Note: The seniority in all cases shall be determined from the date of initial appointment

In light of instant above service rules, during the year 2015, a panel of Diploma Holder Sub Engineers, including the appellant was placed before the Departmental Promotion Committee (DPC). After threadbare discussion, the committee deferred the promotion of the appellant for the reason that his ACRs for the periods of 1980,1983, 1991 to 1994, 1997 to 2000 and 04.07.2001 to 31.12.2001 were not countersigned (**Annex-II**).

6. Incorrect, as explained in para-5 above. The ACRs of the appellant were placed before the DPC, the DPC in its meeting held on 01.09.2015 did not consider his promotion due to lack of his ACRs which were not countersigned. After the meeting of DPC, the appellant has been directed that this incomplete ACRs may be countersigned from the concerned officers and submit the same to this Department immediately, so that his promotion case could be placed before the DPC for consideration accordingly (**Annex-III**).
7. As per record of this Department, in light of Peshawar High Court Peshawar directions the appeal of the appellant examined in the department properly, However the Competent Authority rejected his appeal and informed him accordingly (**Annex-IV**).
8. No comments, as explained in para-5 above.

GROUNDS

- A. Incorrect. The appellant was correctly dealt with in accordance with law/equity. No rights of appellant has been infringed/jeopardized, because he is posted against his original post and scale i.e. BS-11 as Sub Engineer.
- B. Incorrect, as explained in para-5 of the facts.
- C. Incorrect. The promotion cases are considered by the Departmental Promotion Committee (DPC) as per service rules and on the completion of codal formalities, whereas the appellant posting as SDO in own pay and scale cannot be termed as promotion.
- D. Incorrect, as explained in para-C of the grounds.
- E. Incorrect, misconceiving, mere speculation of the appellant.
- F. Incorrect, there is no mala-fide, no discrimination and no violation of rights of the appellant, as the promotion cases are processed according to law and rules.
- G. Incorrect, as explained in para-A of the grounds.
- H. Incorrect. Since the appellants' case is not covered under the rules, he had not been deprived of any fundamental or constitutional rights.
- I. Incorrect, as explained in para-H of the grounds.
- J. The respondents would like to seek permission of the Hon'able Tribunal to advance more grounds during the time of arguments.

In view of the above, it is, therefore, humbly prayed that the appeal being without any substance, may kindly be dismissed with costs.

CHIEF ENGINEER (CENTRE)
C&W DEPARTMENT
(RESPONDENT NO.02)

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT
(RESPONDENTS NO. 1 & 3)

33

3

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No.7505/2021

Zia Jan
Sub Engineer (Retired)

Appellant

Versus

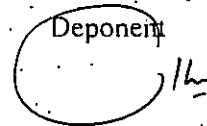
Govt of Khyber Pakhtunkhwa
through Secretary C&W and others

Respondents


AFFIDAVIT

I, Zahid Ullah, Section Officer (Litigation), C&W Department, Peshawar hereby affirm and declare that all the contents of the Parawise comments are correct to the best of my knowledge and belief and nothing has been concealed.

Deponent



Zahid Ullah
Section Officer (Litigation)
C&W Department, Peshawar


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Annex - I

34

4



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Dated Peshawar, the October 14, 2014

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 amendment shall be made, namely:

AMENDMENTS

In the Appendix, 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) twenty percent (20%) 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) eight percent (8%) 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) three and half percent (3.5%) 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*

Note: The seniority in all cases shall be determined from the date of initial appointment

SECRETARY TO
Government of Khyber Pakhtunkhwa
Communication & Works Department

End 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 EQAA 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. Managing Printing Press for publication in the issue of next Govt gazette
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

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(USMAN JAN)
SECTION OFFICER (Estb)

Annex-II

35

MINUTES OF DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD ON 01.09.2015 AT 10:00 A.M UNDER THE CHAIRMANSHIP OF SECRETARY COMMUNICATION & WORKS DEPARTMENT

Meeting of the Departmental Promotion Committee of the C&W Department was held on 01.09.2015 at 10:00 A.M under the Chairmanship of Secretary C&W in the committee room of C&W Department. The following attended the meeting:

1. Engr. Muhammad Asaf
Secretary to Government of
Khyber Pakhtunkhwa
C&W Department Peshawar --- In chair
2. Engr. Fazli Kabir
Chief Engineer (Centre)
C&W Peshawar --- Member
3. Mr. Wazir Muhammad Afgar
Section Officer
Finance Department --- Member
4. Mr. Kashif Iqbal Jilani
Section Officer
Establishment Department --- Member
5. Mr. Usman Jan
Section Officer (Estb)
C&W Department --- Secretary-cum-Member

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2. The meeting started with recitation of Holy Quran and the chair welcomed all the participants. The following two items were discussed in the meeting:

Item-I: Promotion of Diploma Holder Sub Engineers to the post of Assistant Engineer/SDO (B-17) in the C&W Department

The promotion case of Diploma Holder Sub Engineers to the post of Assistant Engineer/SDO (BS-17) was considered against six clear vacancies on regular basis and Departmental Promotion Committee considered the officials included in the panel in order of their seniority/fitness and made the following recommendations:-


1	Muhammad Zubair-I	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
2	Zia Jan	Deferred, as his ACRs for the periods of 01.01.1980 to 09.12.1980, 20.03.1983 to 20.12.1989, 01.01.1991 to 31.12.1994, 01.01.1997 to 30.04.1998, 01.01.1999 to 31.12.2000 and 04.07.2001 to 31.12.2001 are not countersigned.
3	Faiz Muhammad Faiz	Deferred due to pending inquiry
4	Mian Muzakkar Shah	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
5	Zahir-ur-Rehman	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
6	Ghulam Habib	Deferred as countersigning officer has recorded the remarks i.e. "General reputation is not good" on his ACRs for the periods 01.01.2008 to 31.05.2008, 12.06.2008 to 31.12.2008, 01.01.2009 to 11.05.2009, 12.05.2009 to 31.12.2009, besides clarification the position of his ACRs i.e. "period less than 03 months"

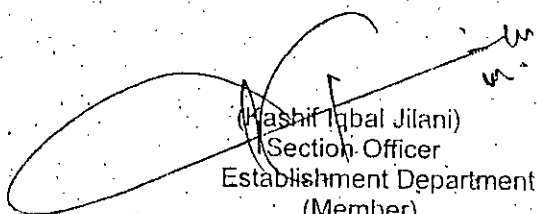
Item-II: PROMOTION OF DIRECT GRADUATE SUB ENGINEERS (BS-11) TO THE POST OF ASSISTANT ENGINEER/SDO (BS-17) ON REGULAR BASIS IN THE C&W DEPARTMENT

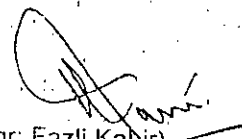
The promotion case of Direct Graduate Sub Engineers to the post of Assistant Engineer/SDO (BS-17) was considered against one clear vacancy on regular basis and Departmental Promotion Committee considered the officials included in the panel in order of their seniority/fitness and made the following recommendations:-

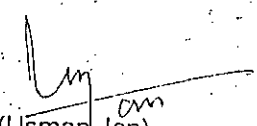
1	Sher Bahadar	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
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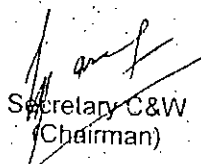
3. The meeting ended with mutual vote of thanks.



 (Wazir Muhammad Afgar)
 Section Officer
 Finance Department
 (Member)


 (Hashif Iqbal Jilani)
 Section Officer
 Establishment Department
 (Member)


 (Engr. Fazli Kabir)
 Chief Engineer (Centre)
 (Member)


 (Usman Jan)
 Section Officer (Estb) C&WD
 (Secretary-cum Member)


 Secretary C&W
 (Chairman)


 REPRODUCED
 TO BE TRUE COPY

Through Regd.

Annex-III

37



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

No. SOE/C&WD/4-2/2015
Dated Peshawar, the Sept 16, 2015

TO

Mr. Zia Jan
Sub Engineer O/O
XEN C&W Division Charsadda

and S
ANNEXED
TO BE TRUE COPY

Subject: PROVISION OF ACRs/PERFORMANCE EVALUATION REPORTS

I am directed to refer to subject noted above and to state that meeting of Departmental Promotion Committee held on 01.09.2015 under the chairmanship of Secretary C&W. In the meeting the promotion of Sub Engineers to the post of AE/SDO (BS-17) was considered. However you were deferred by the DPC due to the reasons that your ACRs for the periods of 01.01.1980 to 09.12.1980, 20.03.1983 to 20.12.1989, 01.01.1991 to 31.12.1994, 01.01.1997 to 30.04.1998, 01.01.1999 to 31.12.2000 and 04.07.2001 to 31.12.2001 have not be countersigned.

2. You are therefore, directed that the ACRs of the aforementioned periods may be countersigned from the concerned officers and submit to this Department immediately so that the case of promotion can be placed before the Departmental Promotion Committee (DPC) for consideration.

Uman Jan
(USMAN JAN)
SECTION OFFICER (Estb)

Endst even No. & date

Copy forwarded to the:

1. Chief Engineer (Centre) C&W Peshawar
2. PS to Secretary C&W Department

22
17-9-15

Uman Jan
SECTION OFFICER (Estb)



Annex-01

GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

38

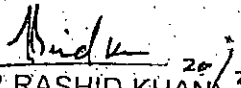
No. No. SOE/C&WD/8-21/2010
Dated Peshawar, the Feb 15, 2018

To

Mr. Zia Jan
the then Sub Engineer
C&W Division Charsadda
(Now retired)

Subject: WRIT PETITION NO.3210-P/2017—ZIA JAN V/S GOVT OF KHYBER
PAKHTUNKHWA SECRETARY C&W DEPARTMENT PESHAWAR ETC.

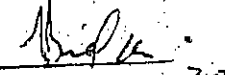
I am directed to refer to Peshawar High Court Peshawar judgment dated 05.12.2017 on the subject noted and to apprise that pursuant to Hon'able Court orders under reference, the case was examined in the light of Provincial Govt Promotion Policy. The Competent Authority has been pleased to reject your appeal/case.



(ABDUR RASHID KHAN) 20/2
SECTION OFFICER (Estb)

Endst even No. & date

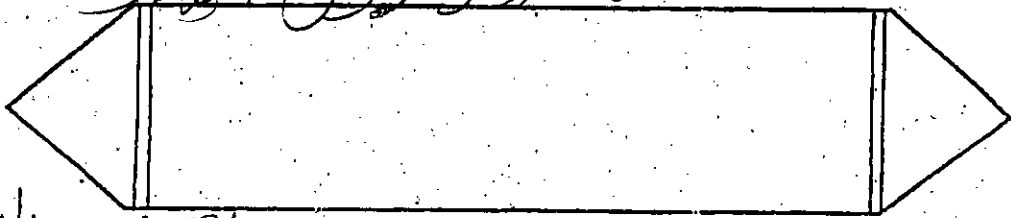
Copy forwarded to the:

1. Registrar Peshawar High Court Peshawar
2. Chief Engineer (Centre) C&W Peshawar w/r to his letter No.406-E/1734/CEC/C&WD dated 11.12.2017
3. PS to Secretary C&W Department, Peshawar


SECTION OFFICER (Estb) 20/2


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بعدالت جناب مسطور وفسر لٹریچر لکھنے کے لئے



اعتناء جناب ایڈیٹرز

صہبہ ہلالہ بنام گورنمنٹ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لئے ~~مقرر~~ کیے ~~مقرر~~ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور اصولی چیک و روپیہ ارضعی دعویٰ اور درخواست ہر قسم کی تصدیق
زرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنا التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہر یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم _____ ماہ _____ 20

کے لئے منظور ہے۔

بمقام

Fazal Sias Mohmand
ASC

(Signature)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No.7505/2021

Zia Jan
Sub Engineer (Retired)

Appellant

Versus

Govt of Khyber Pakhtunkhwa
through Secretary C&W and others

Respondents

INDEX

S.NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Parawise Comments on behalf of Respondent No.1 to 3	-	1-2
2	Affidavit		3
3	Govt of Khyber Pakhtunkhwa C&W Department Notification No.SOE/C&WD/8-12/2014 dated 14-10-2014	I	4
4	Govt of Khyber Pakhtunkhwa C&W Department Departmental Promotion Committee meeting minutes dated 01-09-2015	II	5-6
5	Govt of Khyber Pakhtunkhwa C&W Department letterNo.SOE/C&WD/4-2/2015 dated 16-09-2015	III	-7
6	Govt of Khyber Pakhtunkhwa C&W Department letterNo.SOE/C&WD/8-21/2015 dated 15-02-2018	IV	8

Deponent



Zahid Ullah
Section Officer (Litigation)
C&W Department, Peshawar

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO. 7505 OF 2021

Mr. Zia Jan, Sub Engineer (Retired) --- Appellant
Office of the XEN C&W Division Charsadda

Versus

1. Secretary to --- Respondents
Govt of Khyber Pakhtunkhwa
C&W Department, Peshawar
2. Chief Engineer (Centre)
C&W Department
3. Chief Secretary
Govt of Khyber Pakhtunkhwa
Peshawar

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1, 2 & 3

Respectfully Sheweth;

PRELIMINARY OBJECTIONS:-

1. That the appeal is not maintainable for mis-joinder and non-joinder of necessary parties.
2. That the appellant has never challenged-in time any order in which his rights were alleged to be ignored.
3. That the appeal is premature.
4. That the appellant has got no cause of action and no locus standi to file the instant appeal.
5. That the appeal is time barred.

FACTS

1. Pertains to record, needs no comments.
2. Pertains to record, needs no comments.
3. Pertains to record, needs no comments.
4. Pertains to record, needs no comments.
5. Incorrect. According to the recruitment rules of C&W Department notified on 25.03.2010 which were amended on 14.10.2014, the method of recruitment for the post of Assistant Engineer/SDO is as under (**Annex-I**):
 - a. Sixty five percent (65%) by initial recruitment;
 - b. twenty percent (20%) 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. eight percent (8%) 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. three and half percent (3.5%) 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"

Note: The seniority in all cases shall be determined from the date of initial appointment

In light of instant above service rules, during the year 2015, a panel of Diploma Holder Sub Engineers, including the appellant was placed before the Departmental Promotion Committee (DPC). After threadbare discussion, the committee deferred the promotion of the appellant for the reason that his ACRs for the periods of 1980,1983, 1991 to 1994, 1997 to 2000 and 04.07.2001 to 31.12.2001 were not countersigned (**Annex-II**).

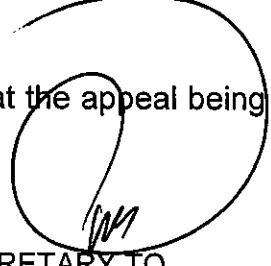
- 6. Incorrect, as explained in para-5 above. The ACRs of the appellant were placed before the DPC, the DPC in its meeting held on 01.09.2015 did not consider his promotion due to lack of his ACRs which were not countersigned. After the meeting of DPC, the appellant has been directed that this incomplete ACRs may be countersigned from the concerned officers and submit the same to this Department immediately, so that his promotion case could be placed before the DPC for consideration accordingly (**Annex-III**).
- 7. As per record of this Department, in light of Peshawar High Court Peshawar directions the appeal of the appellant examined in the department properly, However the Competent Authority rejected his appeal and informed him accordingly (**Annex-IV**).
- 8. No comments, as explained in para-5 above.

GROUND

- A. Incorrect. The appellant was correctly dealt with in accordance with law/equity. No rights of appellant has been infringed/jeopardized, because he is posted against his original post and scale i.e. BS-11 as Sub Engineer.
- B. Incorrect, as explained in para-5 of the facts.
- C. Incorrect. The promotion cases are considered by the Departmental Promotion Committee (DPC) as per service rules and on the completion of codal formalities, whereas the appellant posting as SDO in own pay and scale cannot be termed as promotion.
- D. Incorrect, as explained in para-C of the grounds.
- E. Incorrect, misconceiving, mere speculation of the appellant.
- F. Incorrect, there is no mala-fide, no discrimination and no violation of rights of the appellant, as the promotion cases are processed according to law and rules.
- G. Incorrect, as explained in para-A of the grounds.
- H. Incorrect. Since the appellants' case is not covered under the rules, he had not been deprived of any fundamental or constitutional rights.
- I. Incorrect, as explained in para-H of the grounds.
- J. The respondents would like to seek permission of the Hon'able Tribunal to advance more grounds during the time of arguments.

In view of the above, it is, therefore, humbly prayed that the appeal being without any substance, may kindly be dismissed with costs.


 CHIEF ENGINEER (CENTRE)
 C&W DEPARTMENT
 (RESPONDENT NO.02)


 SECRETARY TO
 GOVT: OF KHYBER PAKHTUNKHWA
 COMMUNICATION & WOKRS DEPARTMENT
 (RESPONDENTS NO. 1 & 3)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No.7505/2021

Zia Jan
Sub Engineer (Retired)

Appellant

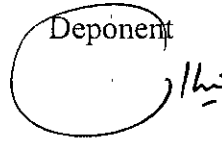
Versus

Govt of Khyber Pakhtunkhwa
through Secretary C&W and others

Respondents

AFFIDAVIT

I, Zahid Ullah, Section Officer (Litigation), C&W Department, Peshawar hereby affirm and declare that all the contents of the Parawise comments are correct to the best of my knowledge and belief and nothing has been concealed.

Deponent


Zahid Ullah
Section Officer (Litigation)
C&W Department, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Dated Peshawar, the October 14, 2014

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 amendment shall be made, namely:

AMENDMENTS

In the Appendix, 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) twenty percent (20%) 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) eight percent (8%) 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) three and half percent (3.5%) 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"

Note: The seniority in all cases shall be determined from the date of initial appointment

SECRETARY TO
Government of Khyber Pakhtunkhwa
Communication & Works Department

Endst 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 EQAA 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. Managing Printing Press for publication in the issue of next Govt gazette
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

Usman Jan
(USMAN JAN)
SECTION OFFICER (Estb)

**MINUTES OF DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD
ON 01.09.2015 AT 10:00 A.M UNDER THE CHAIRMANSHIP OF SECRETARY
COMMUNICATION & WORKS DEPARTMENT**

Meeting of the Departmental Promotion Committee of the C&W Department was held on 01.09.2015 at 10:00 A.M under the Chairmanship of Secretary C&W in the committee room of C&W Department. The following attended the meeting:

- | | | | |
|----|--|-----|----------------------|
| 1. | Engr. Muhammad Asaf
Secretary to Government of
Khyber Pakhtunkhwa
C&W Department Peshawar | --- | In chair |
| 2. | Engr. Fazli Kabir
Chief Engineer (Centre)
C&W Peshawar | --- | Member |
| 3. | Mr. Wazir Muhammad Afaq
Section Officer
Finance Department | --- | Member |
| 4. | Mr. Kashif Iqbal Jilani
Section Officer
Establishment Department | --- | Member |
| 5. | Mr. Usman Jan
Section Officer (Estb)
C&W Department | --- | Secretary-cum-Member |

2. The meeting started with recitation of Holy Quran and the chair welcomed all the participants. The following two items were discussed in the meeting:

Item-I: Promotion of Diploma Holder Sub Engineers to the post of Assistant Engineer/SDO (B-17) in the C&W Department

The promotion case of Diploma Holder Sub Engineers to the post of Assistant Engineer/SDO (BS-17) was considered against six clear vacancies on regular basis and Departmental Promotion Committee considered the officials included in the panel in order of their seniority/fitness and made the following recommendations:-

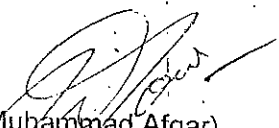
1	Muhammad Zubair-I	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
2	Zia Jan	Deferred, as his ACRs for the periods of 01.01.1980 to 09.12.1980, 20.03.1983 to 20.12.1989, 01.01.1991 to 31.12.1994, 01.01.1997 to 30.04.1998, 01.01.1999 to 31.12.2000 and 04.07.2001 to 31.12.2001 are not countersigned.
3	Faiz Muhammad Faiz	Deferred due to pending inquiry
4	Mian Muzakkar Shah	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
5	Zahir-ur-Rehman	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
6	Ghulam Habib	Deferred as countersigning officer has recorded the remarks i.e. "General reputation is not good" on his ACRs for the periods 01.01.2008 to 31.05.2008, 12.06.2008 to 31.12.2008, 01.01.2009 to 11.05.2009, 12.05.2009 to 31.12.2009, besides clarification the position of his ACRs i.e. "period less than 03 months"

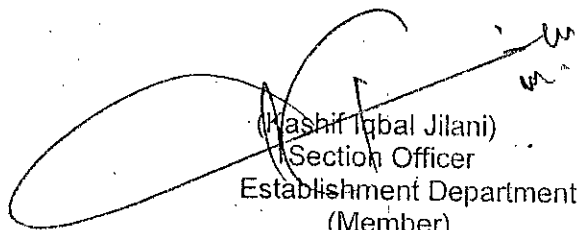
Item-II: PROMOTION OF DIRECT GRADUATE SUB ENGINEERS (BS-11) TO THE POST OF ASSISTANT ENGINEER/SDO (BS-17) ON REGULAR BASIS IN THE C&W DEPARTMENT


The promotion case of Direct Graduate Sub Engineers to the post of Assistant Engineer/SDO (BS-17) was considered against one clear vacancy on regular basis and Departmental Promotion Committee considered the officials included in the panel in order of their seniority/fitness and made the following recommendations:-

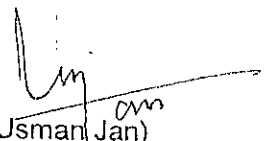
1	Sher Bahadar	Recommended for promotion to the post of Assistant Engineer/SDO (BS-17) on regular basis. He will be on probation for a period of one year.
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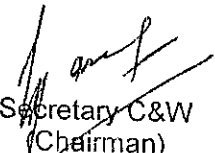
3. The meeting ended with mutual vote of thanks.


 (Wazir Muhammad Afaq)
 Section Officer
 Finance Department
 (Member)


 (Washif Iqbal Jilani)
 Section Officer
 Establishment Department
 (Member)


 (Engr. Fazli Kabir)
 Chief Engineer (Centre)
 (Member)


 (Usman Jan)
 Section Officer (Estb) C&WD
 (Secretary-cum Member)


 Secretary C&W
 (Chairman)

through Regd.

Annex-III

(7)



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

No. SOE/C&WD/4-2/2015
Dated Peshawar, the Sept 16, 2015

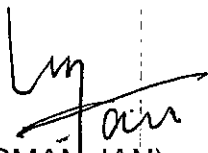
TO

Mr. Zia Jan
Sub Engineer O/O
XEN C&W Division Charsadda

Subject: **PROVISION OF ACRs/PERFORMANCE EVALUATION REPORTS**

I am directed to refer to subject noted above and to state that meeting of Departmental Promotion Committee held on 01.09.2015 under the chairmanship of Secretary C&W. In the meeting the promotion of Sub Engineers to the post of AE/SDO (BS-17) was considered. However you were deferred by the DPC due to the reasons that your ACRs for the periods of 01.01.1980 to 09.12.1980, 20.03.1983 to 20.12.1989, 01.01.1991 to 31.12.1994, 01.01.1997 to 30.04.1998, 01.01.1999 to 31.12.2000 and 04.07.2001 to 31.12.2001 have not be countersigned.

2. You are therefore, directed that the ACRs of the aforementioned periods may be countersigned from the concerned officers and submit to this Department **immediately** so that the case of promotion can be placed before the Departmental Promotion Committee (DPC) for consideration.

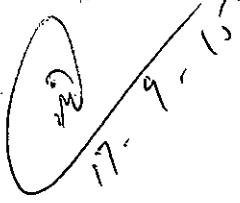

(USMAN JAN)
SECTION OFFICER (Estb)

Endst even No. & date

Copy forwarded to the:

1. Chief Engineer (Centre) C&W Peshawar
2. PS to Secretary C&W Department


SECTION OFFICER (Estb)


17-9-15

Annex-IV

GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

No. No. SOE/C&WD/8-21/2010
Dated Peshawar, the Feb.15, 2018



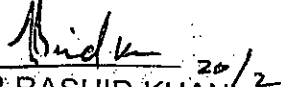
8

To

Mr. Zia Jan
the then Sub Engineer
C&W Division Charsadda
(Now retired)

Subject: WRIT PETITION NO.3210-P/2017—ZIA JAN V/S GOVT OF KHYBER
PAKHTUNKHWA SECRETARY C&W DEPARTMENT PESHAWAR ETC.

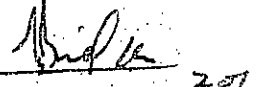
I am directed to refer to Peshawar High Court Peshawar judgment dated 05.12.2017 on the subject noted and to apprise that pursuant to Hon'able Court orders under reference, the case was examined in the light of Provincial Govt Promotion Policy. The Competent Authority has been pleased to reject your appeal/case.


(ABDUR RASHID KHAN)
SECTION OFFICER (Estb)

Endst even No. & date

Copy forwarded to the:

1. Registrar Peshawar High Court Peshawar
2. Chief Engineer (Centre) C&W Peshawar w/r to his letter No.406-E/1734/CEC/C&WD dated 11.12.2017
3. PS to Secretary C&W Department, Peshawar


SECTION OFFICER (Estb)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

C. M. No _____/2022
In
Service Appeal No 7505/2021

Zia Jan.....Appellant

VERSUS

Govt. & others.....Respondents

I N D E X

S. No	Description of Documents	Annexure	Pages
1.	Application for interim relief with Affidavit		1-3
2.	Copy of Order dated 15-02-2011	A	4

Dated:-20-12-2022


Applicant/Appellant

Through


Fazal Shah Mohmand
Advocate,

Supreme Court of Pakistan

OFFICE:- Cantonment Plaza Flat 3/B Khy
Email:- fazalshahmohmand@gmail.com

Bazar Peshawar Cell# 0301 8804841

BEFORE THE KHYBER PAKHTUNHWA SERVICE TRIBUNAL
PESHAWA

C. M. No _____/2022
In
Service Appeal No 7505/2021

Zia Jan.....Appellant

VERSUS

Govt. & others.....Respondents

APPLICATION FOR PERMISSION TO FILE AMENDED APPEAL

Respectfully Submitted:-

1. That the above titled Service Appeal is pending before this honorable Tribunal and is fixed for today, i.e 20-12-2022.
2. That earlier the applicant had filed the titled Service Appeal for the modification of Notification dated 13-10-2015 to the extent of promoting the applicant as Assistant Engineer/SDO (BPS-17) and had also filed departmental appeal for the purpose however at the time of filing the titled Service Appeal, order on departmental appeal was not communicated to the appellant which respondents have filed with their reply/comments, hence the applicant also want to challenge the same order. **(Copy of order dated 15-02-2018 is enclosed as Annexure A).**
3. That as by now the departmental appeal of the appellant has been rejected, which order has not been impugned in the Service Appeal, challenging which is necessary, for the just disposal of titled appeal, hence the applicant seeks leave of this honorable Tribunal to amend the titled Service Appeal to such extent.

3. That the valuable rights of the applicant are involved and the law as well as the dictums of the Superior Courts also favors the amendment of cases for the interest of justice.
4. That if the applicant is not allowed to amend his appeal, the very purpose of his appeal would be lost resulting in multiplicity of litigation.

It is therefore prayed, that on acceptance of this application, the applicant may kindly be allowed to file amended appeal thereby impugning the appellate order dated 15-02-2018 therein.

Dated:-20-12-2022


Applicant/Appellant

Through

Mazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

**BEFORE THE KHYBER PAKHTUNHWA SERVICE TRIBUNAL
PESHAWAR**

C. M. No _____/2022
In
Service Appeal No 7505/2021

Zia Jan.....Appellant

VERSUS

Govt. & others.....Respondents

AFFIDAVIT

I, Zia Jan, Sub Enginee (Retired), Office of Executive Engineer, Communication and Works Division, Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



DEPONENT

Identified by



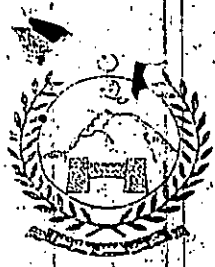
**Fazal Shah Mohmand
Advocate Peshawar**



20 DEC 2022

Annex - A

4



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

No. 1 SOE/C&WD/8-21/2010
Dated Peshawar, the Feb 15, 2018

To

Mr. Zia Jan
the then Sub Engineer
C&W Division Charsadda
(Now retired)

Subject: WRIT PETITION NO.3210-P/2017-ZIA JAN VIS GOVT OF KHYBER
PAKHTUNKHWA SECRETARY C&W DEPARTMENT PESHAWAR ETC.

I am directed to refer to Peshawar High Court Peshawar judgment dated 05.12.2017 on the subject noted and to apprise the pursuan to Hon'able Court orders under reference, the case was examined in the light of Provincial Govt Promotion Policy. The Competent Authority has been pleased to reject your appeal/case.

Abdul Rashid Khan
20/2
ABDUL RASHID KHAN
SECTION OFFICER (Estb)

Endst even No. & date

Copy forwarded to the:

1. Registrar Peshawar High Court Peshawar
2. Chief Engineer (Centre) C&W Peshawar 1734/CEC/C&WD dated 11.12.2017
3. PS to Secretary C&W Department, Peshawar

w/r to his letter No.406-E/

Abdul Rashid Khan
20/2
SECTION OFFICER (Estb)

APPROVED
TO BE
COPY