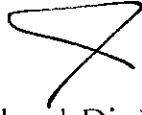


15th March, 2023

Appellant alongwith his counsel present. Mr. Fazal Shah Mohmand, Additional Advocate General for official respondents present. Private respondents in person present.

Learned counsel for the appellant produced copy of an order showing promotion of some Patwaris including the appellant to the post of Kanungo (BPS-11). Learned counsel for the appellant submits that the appellant has to take some appropriate steps in order to meet the new development. To come up for further proceedings on 20.04.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
REPORT
POSTMASTER



(Salah-ud-Din)
Member (J)



(Kalim Arshad Khan)
Chairman

20.04.2023

Counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

The Worthy Chairman is on leave today, the bench is, therefore incomplete. To come up for arguments on 23.06.2023 before the D.B. Parcha Peshi given to the parties.



(FAREEHA PAUL)
Member (E)

Fazle Subhan P.S

OFFICE ORDER

In pursuance of minutes of the meeting of Departmental Promotion Committee and its recommendations, dated 19-08-2022, the following Five (05) Nos of posts of Patwaris (BPS-09) are hereby promoted as Kanungo (BPS-11) against the vacant posts with immediate effect.

S.No	Name of Official with Designation	Promoted as
1	Azmat Ullah Khan, Patwari (BPS-09).	Kanungo (BPS-11) (DDO Code Kt 6316).
2	Inam U Haq, Patwari (BPS-09).	Kanungo (BPS-11) (DDO Code Kt 6316).
3	Muhammad Qasim, Patwari (BPS-09).	Kanungo (BPS-11) (DDO Code Kt 6316).
4	Kashif Jamal, Patwari (BPS-09).	Kanungo (BPS-11) (DDO Code Kt 6382).
5	Sana Zeb, Patwari (BPS-09).	Kanungo (BPS-11) (DDO Code Kt 6382).

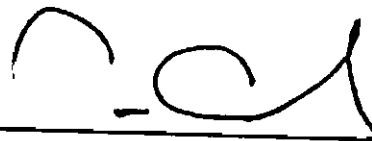
TERMS & CONDITIONS:-

- The officials will be on probation for a period of one year and will be reverted to lower scales if their performance is found unsatisfactory.
- Their seniority will be maintained/fixed with other Kanungos in accordance with their date of promotion.
- They can be transferred / posted anywhere in the District Kohat.


Deputy Commissioner
Kohat

Copy forwarded for information to the:

1. Additional Deputy Commissioner (G), Kohat
2. Additional Deputy Commissioner, (F&P) Kohat
3. Secretary to Commissioner, Kohat Division Kohat.
4. District Comptroller of Accounts, Kohat.
5. Assistant Commissioner, Kohat
6. Assistant Commissioner, Lachi.
7. Assistant Commissioner TSD Darra.
8. Account Officer, DC Office Kohat.
9. Superintendent to Deputy Commissioner, Kohat.
10. Tehsildar Kohat / Lachi/ Gumbat/TSD Darra.
11. Official, concerned for information and compliance.



31st Jan, 2023

Appellant in person present present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for official respondents and private respondents No. 4,5 and 6 in person present.

Appellant submitted wakalatnama of Mr. Ahmad Sultan Tareen, Advocate in his favour and seeks adjournment on the ground that his counsel is not available today. To come up for arguments on 27.02.2023 before the D.B. P.P is given to the parties.

SCANNED
F-3T
Peshawar



(Muhammad Akbar Khan)
Member(Executive)



(Kalim Arshad Khan)
Chairman

27.02.2023

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 3 present. Private respondents No. 4 to 6 also present.

Clerk of learned counsel for the appellant as well as private respondents No. 4 to 6 requested that their respective counsel are not available today, therefore, an adjournment may be granted to them. Adjourned. To come up for arguments on 15.03.2023 before the D.B. P.P given to the parties.



(Fareeha Raul)
Member (E)



(Salah-ud-Din)
Member (J)

30.09.2022

Appellant in person present.

Riaz Khan Paindakhel, learned Assistant Advocate General for respondents present.

Former made a request for adjournment as his counsel is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 25.11.2022 before D.B.



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

25.11.2022

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

Learned counsel for the appellant sought adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 31.01.2023 before the D.B.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

S.A No. 3243 / 2021
/2022/2023

Kashif Jamal

VS

GOVT. OF KP & OTHERS

I, Kashif Jamal do hereby nominated and appointed **AHMED SULTAN TAREEN**, Advocate High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred in the above matter as and is agreed to sign and file petition, appeals, statements, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc and to apply for and issue summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceedings that may arise there out; and to apply for and receive payment of any or all sums or submit the above matter to arbitration, and to employ an other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the advocate whenever he may think fit to do so.

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

AND I/WE hereby agree to ratify and confirm all lawful acts done on my/our behalf; under or by virtue of these present or of the usual practice in such matter. PROVIDED always that I/WE undertake at the time of calling of the case by the court I/MY authorized agent shall inform the advocate and make him appear in the court, if the case, may be dismissed in default, it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHERE OF I/We hereunto set MY/OUR hand to these presents, the contests of which have been explained to and understood by ME/US this _____ day of _____ 2022 / 2023.

EXECUTANT

(Kashif)

Accepted subject to the terms regarding fees:

Ahmed

AHMAD SULTAN TAREEN
ADVOCATE HIGH COURT, PESHAWAR
BC No.(BC-10-1583)
0333-9434837

Allahyar Khan
ALLAHYAR KHAN TAREEN
ADVOCATE HIGH COURT, PESHAWAR

Haider Ali
HAIDER ALI
ADVOCATE HIGH COURT, PESHAWAR

Inayat Ullah Khan
INAYAT ULLAH KHAN TAREEN
ADVOCATE HIGH COURT

OFFICE: **TF-338, 339**, Deans Trade Centre, Peshawar Cantt.
Contact#:

27th May, 2022

Clerk of the counsel present. Mr. Naseerud Din Shah,
Asstt. AG for respondents present.

Arguments could not be heard due to general strike of
the bar. Adjourned. To come up for arguments on 29.06.2022
before D.B.



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

29.06.2022

Appellant alongwith his counsel present. Mr. Shahid
Rehman, Subject Specialist alongwith Mr. Riaz Ahmad
Paindakhel, Assistant Advocate General for official respondents
No. 1 to 3 present. Private respondents No. 4 & 5 alongwith their
counsel Mr. Muhammad Iftikhar Khan, Advocate present and
submitted Wakalatnam, which is placed on file. Private
respondent No. 6 in person present.

Written reply on behalf of official respondents No. 1 to 3
submitted, which is placed on file and copy of the same is
handed over to learned counsel for the appellant, who sought
adjournment on the ground that he has not gone through the
written reply submitted today by the respondents. Adjourned. To
come up for rejoinder, if any, as well as arguments on
12.08.2022 before the D.B.



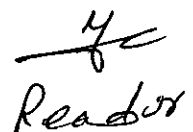
(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member (J)

12-8-2022


Proper DB not available the case is
adjourned to 30-9-2022


Reader

23.11.2021

Proper D.B is not available, therefore, case is adjourned to 2/3/2022 for the same as before.

2-3-22


Reader
Due to Retirement of the Hon.ble Chairman
the case is adjourned to come up for
the same as before on 9-5-22

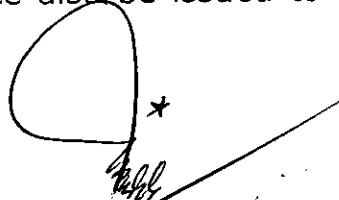

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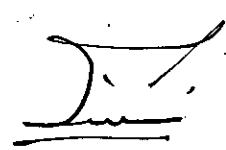
09.05.2022

Appellant alongwith his counsel present. Mr. Riaz Ahmed Paindakheil, Assistant Advocate General for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 to 6.

Replies/comments on behalf of private respondents No. 4 to 6 have already been submitted. Official respondents requested for submission of reply. Last opportunity given. To come up for submission of reply/comments on behalf of official respondents No. 1 to 3 as well as arguments before the D.B on 27.05.2022.

Notice also be issued to private respondents for the date fixed.


(Mian Muhammad)
Member (E)


(Salah-ud-Din)
Member (J)

3243/21

P.S

14.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.


Chairman

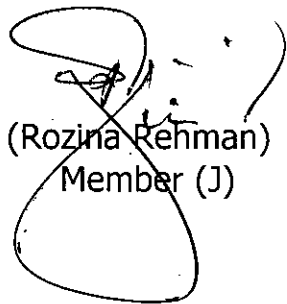
30.03.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to the respondents. To come up for written reply/comments on 2/07/2021 before S.B.

Annexed with the memo of appeal is an application for suspension of the operation of office order dated 11.12.2020 with a request for preventing the respondents from passing any other adverse order prejudicing the present case and service rights of the appellant. Notice of this application be served upon respondents and file to come up for reply/comments to the said application on the date fixed.

Appellant Deposited
Security & Process Fee


(Rozina Rehman)
Member (J)

02.07.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for official respondents, Private respondents No. 4 & 5 in person present. Mr. Fazal Shah Mohmand Advocate for respondent No. 6 present and Wakalatnama submitted which is placed on file.

Respondents have not submitted reply/comments and requested for time to submit the same. Learned AAG is required to contact the official respondents. All the respondents are directed to submit reply/comments within 10 days in office, positively. In case the respondents have not submitted reply/comments within stipulated time, office shall put up the appeal with a report of non-compliance. To come up for arguments on 23.11.2021 before the D.B.

Stipulated period has passed and reply has not been submitted.


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 32243 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1- CANNED KPST Peshawar	01/03/2021	<p>The appeal of Mr. Kashif Jamal resubmitted today by Mr. Abdul Zakir Tareen 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 01/03/2021</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30/03/21</u></p> <p style="text-align: right;">CHAIRMAN</p>

The appeal of Mr. Kashif Jamal son of Muhammad Mumtaz Patwari Darmalak Kohat received today i.e. on 19/02/2021 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Memorandum of appeal may be got signed by the appellants.
- 3- The law under which appeal is filed is not mentioned.
- ④ Addresses of respondent no. 5 & 6 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ⑤ Copy of seniority list mentioned in para-vi of the memo of appeal (Annexure-D) is not attached with the appeal which may be placed on it.
- 6- Copy of reversion order of the appellants mentioned in para-viii of the memo of appeal is not attached with the appeal which may be placed on it.
- ⑦ Copy of departmental appeal made by the appellants before respondent no.2 is not attached with the appeal which may be placed on it.
- ⑧ Pages no. 13, 14, 16 to 22, 24, 27 & 28 to 30 of the appeal are illegible which may be replaced by legible/better one.

No. 381 /S.T,

Dt. 22/02/2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Abdul Zakir Tareen Adv. Pesh.

Respected Sir,

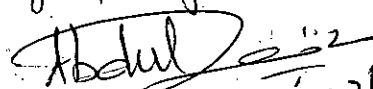
In view of above objections all the requirements are fulfilled.

1. Annexures are duly attested.
2. Memo of Appeal signed.
3. Law mentioned.
4. Addresses of Respondents 5 & 6 are given as per their residence.
5. Minutes of the meeting provided where Seniority is mentioned.
6. Reversion Order provided.
7. Attested copy of Departmental Appeal provided and it is page-9.
8. The pages are legible.

Be fixed before the Hon'ble bench for an earlier date being of urgent nature, please

counsel

For Appellant.



22/2/21

11397

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

APPEAL No. /2021

3243/21

KASHIF JAMAL..... VERSUSSMBR, AND OTHERS.

Index

S/No	Subject	Annexure	Page No
1	Appeal, CM & Affidavit & Departmental Appeal To Commissioner		1-10-A
2	Passing Departmental Exam for Patwari	A	11-13
3	Appointment order of Appellant	B	14
4	Passing Departmental Exam for Kanungo	C	15-20
5	Seniority proof	D	21
6	Promotion Order No. 110 Dated: 21/01/2019 of Appellant & NoC for appearance in the Exam of Naib Tehsildar	E & F	22-23
7	Reversion/Transfer Order No. 1258/DC/KT dated: 08/09/2020	G	24
8	Safdar Rehman Respondent No. 4 Applications refused Promotion	H & I	25-26
9	NOTIFICATION DATED: 22/10/2011	J	27
10	NOTIFICATION DATED: 23/01/2015 & Comments of Respondents No. 1 to 3 & Promotion Order No. 6550 of Respondents No.4 to 6	K & L	28-31
11	Departmental appeal to DC dated: 08/01/2021 and turning down ORDER NO. 249 DATED: 21/01/2021	M & N	32-35
12	Wakalat Nama		36

Dated: 19.02.2021

Abdul Zakir Tareen
ABDUL ZAKIR TAREEN

ADVOCATE, SUPREME COURT OF PAKISTAN

Appellant
Through

Kashif

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

APPEAL No. _____ /2021

**KASHIF JAMAL S/O Muhammad Mumtaz (Patwari)
Darmalak, KohatAppellant**

VERSUS

1. SMBR (Senior Member Board of revenue), Khyber Pakhtunkhwa, Peshawar.
 2. Commissioner, Kohat Division, kohat.
 3. Deputy Commissioner, Kohat Division, kohat.
 4. Safdar Rehman S/O Abdullah Khan (Kanungo) (Address Office Distt Kanungo, Distt courts, Kohat).
 5. Musharraf Masood S/O Maqbool Ahmed (Kanungo) R/O Mohallah Peer Abdullah Shah, Kohat City, Kohat (Address Office Distt Kanungo, Distt courts, Kohat).
 6. Miraj Khan S/O Abdul Rauf Khan (Kanungo) R/O Dhooda, Banda Muasum Khan, Tehsil & Distt Kohat (Address Office Distt Kanungo, Distt courts, Kohat).
-Respondents

APPEAL

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT

AGAINST THE IMPUGNED OFFICE ORDER NO. 6550/-/DC-KT/ESTB DATED: 11/12/2020 ISSUED FROM THE OFFICE OF DEPUTY COMMISSIONER, KOHAT, VIDE WHICH THE OFFICIAL RESPONDENTS WITHOUT WAITING FOR THE DECISION OF THIS AUGUST TRIBUNAL (IN APPEAL NO.1060/2018) (FILED AGAINST SENIORITY LIST) PASSED OUT OF TURN PROMOTION ORDER IN FAVOUR OF THREE JUNIOR PATWARIES (RESPONDENTS NO.4 TO 6) IGNORING THE APPELLANT FROM PROMOTION.

AGAINST WHICH THE DEPARTMENTAL APPEAL DATED: 08/01/2021 FILED BEFORE THE COMMISSIONER & PETITION DATED: 08/01/2021 FILED BEFORE THE DEPUTY COMMISSIONER, KOHAT WERE TURNED DOWN VIDE IMPUGNED ORDERS DATED: 21/01/2021 & 11/02/21.

PRAYER-IN-APPEAL

ON ACCEPTANCE OF THIS APPEAL BOTH THE IMPUGNED ORDERS:

- i. OFFICE ORDER NO. 6550/-/DC-KT/ESTB DATED: 11/12/2020; AND
- ii. ORDER ON DEPARTMENTAL APPEAL DATED: 11/02/2021 PASSED BY THE COMMISSIONER & ORDER DATED: 21/01/2021 PASSED BY DC, KOHAT ON APPLICATION. MAY KINDLY BE RE-CALLED/SET-ASIDE.
- iii. FURTHER DIRECTIONS FOR ANTE DATE PROMOTION OF THE APPELLANT TO THE POST OF KANUNGO BY TREATING HIM PROMOTED, WHILE ALLOWING HIM ALL BACK & CONSEQUENTIAL BENEFITS & ORDER OF CORRECTION OF HIS SENIORITY MAY VERY GRACIOUSLY BE ISSUED.
- iv. ANY OTHER REMEDY WHICH THIS HON'BLE TRIBUNAL DEEMS JUST & APPROPRIATE MAY ALSO BE ALLOWED.

Respectfully Submitted

1. The Appellant having B.A degree with best Academic record:
 - i. under gone the requisite Patwar course;
 - ii. Firstly appeared in the Patwar Examination by passing/ Declared Successful in 8-papers out of 9 on 26/11/1996.
 - iii. Appellant Passed the Departmental Exam for Patwari on 27/02/2003 was enlisted in the Patwar Candidates Register on 20/01/2004.
{Passing Departmental Exam for Patwari Proof Annex-A}
 - iv. Appellant was appointed as Patwari on 10/07/2006.
{Appointment order of Appellant Proof Annex-B}
 - v. Appellant serving the department devotedly and without any blame also passed Kanungo exam on 15/01/2016.
{Passing Departmental Exam for Kanungo Proof Annex-C}
 - vi. The appellant got place in the seniority list.
{Seniority/Minutes showing Appellant's Seniority Proof Annex-D}

vii. The Appellant was promoted (on temporary basis) to the post of ADK and issued NoC for appearance in the Exam of Naib Tehsildar on 27/03/2019.
{Promotion Order No. 110 Dated: 21/01/2019 of Appellant and NoC for appearance in the Exam of Naib Tehsildar Proof Annex-E & F}

viii. But subsequently Respondent No.3 illegally, unjustifiably and adversely reverted the appellant from the post of ADK/Kanungo to patwari and transfer him to darimalak vide Office Order No. 1258/DC/KT dated: 08/09/2020.
{Reversion/Transfer Order No. 1258/DC/KT dated: 08/09/2020 Proof Annex-G}

2. That the Appellant though passed Patwar exam earlier and got place at serial No. 22 of the Patwar Register was malafidely appointed late, on 10/07/2006.
3. That the Respondent No. 4 twice refused promotion on 9/6/2016 & 14/03/2018, so only one Sanazeb Patwari was at the race of Promotion with Appellant, who is shown senior in the Seniority list, for which the appellant already filed legal remedy, and that appeal is in the final stage of adjudication before Tribunal, in which Partial Arguments Heard.

{Safdar Rehman Respondent No. 4 Applications refused Promotion Proof Annex-H & I}

So as per NOTIFICATION DATED: 22/10/2011 he can't be promoted.

{NOTIFICATION DATED: 22/10/2011 Proof Annex-J}

4. That the Respondents No. 4, 5 & 6 passed Kanungo exam after the Appellant. So they being junior to the Appellant did not deserve promotion as per NOTIFICATION DATED: 23/01/2015 & Comments of Respondents No. 1 to 3 at P-30-A Para-6.

{NOTIFICATION DATED: 23/01/2015 Annex-K}

5. That the Official Respondents without waiting for the decision of this August Tribunal and without looking in to the matter that all of Respondents No. 4, 5 & 6 Passed Kanungo Exam after Appellant, issued out of turn promotion Order No. 6550/-/DC-KT/Estb dtd: 11/12/20 issued from the office of Deputy Commissioner, Kohat in favour of three junior patwaries (Respondents No.4 to 6).

{Promotion Order No. 6550 of Respondents No.4 to 6 Proof Annex-L}

6. That the Appellant filed Departmental appeal DATED: 08/01/2021 before the Commissioner & Petition Dated: 08/01/2021 were Turned Down Vide **Impugned Orders Dated: 11/02/21** By Commissioner & **Dated: 21/01/2021** by Deputy Commissioner, Kohat.

{Departmental appeal to Commissioner & ORDER Dtd:11/02/21 at P-9 to 10-A and ORDER Dtd: 21/01/2021 of DC Proof Annex-M & N}

7. That being dissatisfied with the **Impugned OFFICE ORDER NO. 6550/-DC-KT/Estb DATED: 11/12/2020 & ORDER ON DEPARTMENTAL APPEAL DATED: 11/02/2021 PASSED BY THE COMMISSIONER & ORDER NO. 249/-DC-KT/ESTB DATED: 21/01/2021 PASSED BY DC** on Application, the Appellant is invoking the Appellate jurisdiction of this August Tribunal, on the following grounds inter-alia:

GROUND:

- A. Because the present Appellant has not been treated in accordance with Law and hence his rights secured & guaranteed under the Law are badly violated.
- B. That the impugned **OFFICE ORDER NO. 6550/-DC-KT/Estb DATED: 11/12/2020 & ORDER ON DEPARTMENTAL APPEAL DATED: 11/02/2021 PASSED BY THE COMMISSIONER & ORDER NO. 249/-DC-KT/ESTB DATED: 21/01/2021 PASSED BY DC** on Application are against law, facts and in utter disregard of the material available on service record, without jurisdiction and without proper exercise of legal powers, hence the same are untenable.
- i. Because this order is issued out of turn without looking into Seniority-cum-fitness.
 - ii. Because out of these three one (SAFDAR REHMAN) Respondent No. 4 twice refused Promotion. So as per NOTIFICATION DATED: 22/10/2011 he can't be promoted.
 - iii. Because the Second Patwari (Musharraf Masood) Respondent No. 5 who passed Kanungo Examination on 15/02/19, so he as per NOTIFICATION dated: 23/01/2015 relevant serial No.6 & Comments of Respondents No. 1 to 3 at P-30-A Para-6 he did not complete 3-years Service after passing Kanungo Examination, so he was not deserving for promotion.
 - iv. Similar is the case of Third Patwari (Miraj Khan) Respondent No. 6 who Enlisted as Patwari in the Patwar List on 26/11/2004, while the Appellant Enlisted as Patwari in the Patwar List on 20/01/2004. The Appellant is Senior on this count too and deserve Promotion instead of this Respondent.
 - v. Further (Miraj Khan) passed Kanungo Examination on 15/02/2019, so he as per NOTIFICATION dated: 23/01/2015 & Comments of Respondents No. 1 to 3 at P-30-A Para-6 he also did not complete 3-years Service after passing Kanungo Examination, was also not eligible for Promotion.
 - vi. Beside this the Appellant passed Kanungo Exam on 15/01/2016 and he worked on this post for sufficient time on temporary basis, he under the Doctrine of Seniority-cum-fitness entitle for promotion (instead of Respondents No.4 to 6 and thus the promotion order of these Respondents is issued illegally, unjustifiably and against Rules. But with malafide intent and in-order to defeat and defy merits, promotion order is issued illegally, unjustifiably and out-of-turn during the pendency of Appeal No.1060 of 2018.

DETAILS OF APPELLANT AND RESPONDENTS NO.5 & 6 FOR COMPARISON

	KASHIF JAMAL (Appellant)		Proof
1	Date of Birth	15/03/1975	Page--11
2	Education	B.A	Page--11
3	Patwari Exam Passed	27/02/2003	Page--11
4	Enlistment as Patwari in the Patwar List	20/01/2004	Page—11 & 13
5	Number at Enlistment Register of Patwaris	22	Page--11
6	Appointment as Patwari	10/07/2006	Page--14
7	Kanungo Exam Passed	15/01/2016	Page—15 & 18

	Musharraf Masood (Respondent No. 5)		Proof
1	Date of Birth	05/03/1974	Page--12
2	Education	F.A	Page--12
3	Patwari Exam Passed	26/11/1996	Page--12
4	Enlistment as Patwari in the Patwar List		Page--
5	Number at Enlistment Register Of Patwaris	10	Page--12
6	Appointment as Patwari	25/06/2002	Page--
7	Kanungo Exam Passed	15/02/2019	Page--

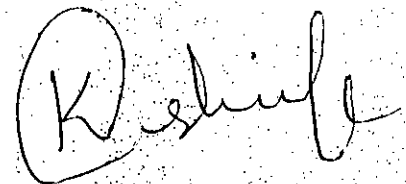
	Miraj Khan (Respondent No. 6)		Proof
1	Date of Birth	13/05/1977	Page--11
2	Education	B.A	Page--11
3	Patwari Exam Passed	10/07/2004	Page--11
4	Enlistment as Patwari in the Patwar List	26/11/2004	Page--11
5	Number at Enlistment Register Of Patwaris	23	Page--11
6	Appointment as Patwari	08/05/2006	Page--
7	Kanungo Exam Passed	15/02/2019	Page--

- C. That the Appellant has been greatly discriminated as junior patwaris were out of turn/against merits appointed & promoted to the posts of Kanungo, hence the impugned orders are un-sustainable.
- D. That the Appellant is Senior most and fit/eligible for promotion to the post of Kanungo, however he has been ignored for no fault on his part, hence the impugned Order are liable to be set at naught.

IT IS THEREFORE, MOST RESPECTFULLY PRAYED THAT on acceptance of this Appeal both Impugned Orders:

- i. **OFFICE ORDER NO. 6550/-/DC-KT/Estb DATED: 11/12/2020; and**
- ii. **ORDER ON DEPARTMENTAL APPEAL DATED: 11/02/2021 PASSED BY THE COMMISSIONER & ORDER DATED: 21/01/2021 PASSED BY DC, KOHAT ON APPLICATION.**
may kindly be re-called/set-aside.
- iii. **FURTHER directions for ante date Promotion of the Appellant to the post of Kanungo by treating him promoted, being ignored and discriminated in violation of Law & rules, while allowing him all back & consequential Benefits.**

Any other remedy which this Hon'ble Tribunal Deem just & appropriate May also be Allowed.



APPELLANT

THROUGH



ABDUL ZAKIR TAREEN

Dated: 19/02/2021

ADVOCATE, SUPREME COURT OF PAKISTAN

BEFORE THE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL, PESHAWAR.

CM NO...../2021
IN
APPEAL No...../2021

KASHIF JAMAL..... VERSUSSMBR, AND OTHERS

APPLICATION FOR SUSPENSION OF THE OPERATION OF:

- i. **OFFICE ORDER NO. 6550/-/DC-KT/Estb DATED: 11/12/2020** ISSUED FROM THE OFFICE OF DEPUTY COMMISSIONER, KOHAT, VIDE WHICH THE RESPONDENTS WITHOUT WAITING FOR THE DECISION OF THIS AUGUST TRIBUNAL (ON THE POINT OF SENIORITY) (IN SERVICE APPEAL NO.1060/2018) PASSED OUT OF TURN PROMOTION ORDER IN FAVOUR OF THREE JUNIOR PATWARIES. **FURTHER** IN THIS RESPECT GRANTING STATUS-QUO ANTE.
- ii. **AND PREVENTING RESPONDENTS FROM PASSING ANY OTHER ADVERSE ORDER PREJUDICING THE PRESENT CASE AND SERVICE RIGHTS OF APPLICANT.**

Respectfully Submitted

1. The above captioned Service appeal is being filed today in this August Tribunal; for the purpose of disposal of this CM the main Appeal may be considered as its integral part.
2. That the Respondents without waiting for the decision of this August Tribunal (ON THE POINT OF SENIORITY) (IN SERVICE APPEAL NO.1060/2018) issued out of turn promotion Order No. 6550/-/DC-KT/Estb dated: 11/12/2020 issued from the office of Deputy Commissioner, Kohat in favour of three junior patwaries .
3. This order is issued out of turn without looking into Seniority-cum-fitness.
4. Out of these three one (SAFDAR REHMAN) twice refused Promotion in this regard Rules are clear.
5. While the Second Patwari (Musharraf Masood) who passed Kanungo Examination on 15/02/2020, so he as per NOTIFICATION dated 23/01/2015 relevant serial No.6 did not complete three years Service after passing Kanungo Examination, thus his promotion order is issued illegally, unjustifiably and adversely to effect this Appeal.

6. Similar is the case of Third Patwari (Miraj Khan) who passed Kanungo Examination on 15/02/2019, so he as per NOTIFICATION dated 23/01/2015 was also not eligible for Promotion.

But with malafide intent and in-order to defeat and defy the merits, promotion order is issued illegally, unjustifiably and out-of-turn.

7. That the contents of main appeal may be considered as part of this petition.

8. The Applicant has a good and prima facie case. There are maximum chances of the success of main case. The balance of convenience also lies in favour of Applicant, if this interim relief is not granted; the Applicant would suffer irreparable loss.

IT IS THEREFORE, MOST RESPECTFULLY PRAYED THAT ON ACCEPTANCE OF THIS CM, THE OPERATION OF OFFICE ORDER NO. 6550/-/DC-KT/Estb DATED: 11/12/2020.....And

AND PREVENTING RESPONDENTS FROM PASSING ANY OTHER ADVERSE ORDER, PREJUDICING THE PRESENT CASE, AND SERVICE RIGHTS OF APPLICANT.

APPLICANT
THROUGH
ABDUL ZAKIR TAREEN

Dated: 19/02/2021

ADVOCATE, SUPREME COURT OF PAKISTAN

AFFIDAVIT

I, Kashif Khan S/O Muhammad Mumtaz R/O Jarwanda Road, Kohat city, Tehsil and District Kohat do hereby solemnly affirm and declare upon oath that the contents of the accompanying petition are true and correct to the best of my knowledge & belief and nothing has been concealed or with held there from this Hon'ble Tribunal.


Deponent

حیدرآباد کے محکمہ صحت کے کورسنگ آفیسر اور کورسنگ آفیسر کے ساتھ ساتھ دیگر کورسنگ آفیسر کے ساتھ ساتھ۔
عنوان: محمد امین ایمل برخواستہ آفس آرڈر نمبر

No: 6550/DC-KT/Estb. عباراد کا افسانہ نمبر کے دستخط کے ذریعے
Dated: 11-12-2020

سائل کا شرف جمال رابعہ قانونی / ADK حال نصیحت مجھے شواہد (ر)

(ای میل کے ذریعے)
Under Protest

Sami

11-1-2021

بنام
Estb: وغیرہ

(رہنما ڈسٹ)

Attested
B

عباراد کے ساتھ

نصیحت اختیار کرنا مزار شریف کے ایمل عنوان بالا آرڈر جاری ہے۔
1۔ یہ کہ سائل نے سٹیٹ کے خلاف جسے عبارتہ وغیرہ پر ایمل
سٹیٹس ٹریبیونل DB سٹیٹس ٹریبیونل کے آرڈر کے تحت ایمل نمبر 1060/2018
عنوان ایمل کا شرف جمال بنام SMBR دائر کر کے ہے
جو کہ حال بدستور رہتا ہے اور جسے اور جسے
آئندہ تاریخ معززہ 08/03/2021 ہے۔

2۔ یہ کہ بدوران زیر سماعت ایمل کے خلاف سٹیٹس جو کہ حال
زیر تجویز زیر سماعت ہے نیز بعد عنوان بالا آفس آرڈر نمبر
03 جو نمبر ٹریبیونل (قانونی ڈسٹ) کو مجھے
قانونی (BPS-11) (out of Turn) ٹریبیونل کے پاس
مذکورہ خلاف عبارتہ۔ خلاف تو اور یہ مخالفات کے ساتھ ہے۔

P.T.O

6 دسمبر 2021

آئی اے اینٹرپرائزس سے قانونگو (BPS-11) ترقی پانے والا عہدہ درجہ 11
02 سہ ماہیہ پختہ ہوا قانونگو پیرسوشن (پنس) سے انعام (پنشن) کے لئے (پنشن) کے لئے
اپریل 2021 روزانہ سرکاری مہل کے

دوران (سماعت) اپریل، روزانہ میں ترمیم کو خواہ مخواہ پختہ قانونگو
شرعی عدالت ہے اگرچہ دوران سماعت کے سن ہی ترمیم ہی روزانہ میں ترمیم
ممبرسٹریٹس ٹریبیونل DB شماره ریائی کورٹ کے سہ ماہیہ ناقابل ترمیم
جو کہ عدالت پیرسوشن کے بالا فورم ہے۔

Attested
[Signature]

دوسرے انٹرپرائزس مسعود اور سوئم انٹرپرائزس صاحبان نے انجان قانونگو

سہ ماہیہ 02-2019-15 کو یا سن کے ایک اور مطابق تاہم نقل ہونے دونوں

03 سال کا ٹائم پیئرڈ مورفہ 2022-02-15 کو پورا ہونا کے اسلئے

روانہ نو اعلیٰ حق الاموال سے منقاد قرار پانے میں پیرسوشن انٹرپرائزس مورفہ 01/15/2019
کے پیرسوشن کے قانونگو میں تبدیل شدہ ہیں۔

No: 6550/DC-KT/Estb آرڈر نمبر
Dated: 11/12/2020

قائم و مستوح ظہیر کے احکام صادر فرمائے جائیں جو کہ سن اپریل 2020 سے

پیرسوشن کے پورا انٹرایمز پختہ قانونگو اور تاہم نقل ہونے پیرسوشن
جو کہ شرعی دے کر جائزہ داری کی جائے۔

التعمیر

اپریل 2021 سے فاسف شمال آفریدی سابقہ قانونگو/ADIK حال سوانی علاقہ درجہ پختہ ہونے
منع کو عانت۔

103 درجہ
منع سوانی علاقہ درجہ
[Signature]
08/01/2021

قائم پیرسوشن
1- کورس ٹریبیونل DB شماره ریائی کورٹ
تو کہ سماعت / روزانہ۔

BEFORE THE COURT OF COMMISSIONER KOHAT DIVISION
KOHAT

Kashif Jamal Patwari.

(Appellant)

V/S

Deputy Commissioner Kohat

(Respondent)

Subject: - **PARAWISE COMMENTS IN APPEAL NO 1/2021 TITLED AS KASHIF JAMAL VS DC KOHAT.**

Parawise Comments are as under:-

Para No.1: Correct. It is pertinent to mention here that no doubt that the appellant case regarding his seniority list is in trial in the Honourable Service Tribunal Khyber Pakhtunkhwa Peshawar but his seniority issue is purely with the official named Mr Sanazeb Patwari (BPS-09) who has neither promoted to the next higher rank nor even considered to be promoted.

Para No.2: Incorrect. That the seniority of patwaris to further promotion i.e. Kanungo is considered from the date of their appointment as regular Patwari. It does not matter if a Patwari higher in rank passes Kanungo exam later than the Patwari lower in rank. So all the patwaris who have been considered for promotion in the DPC dated: 11/12/2020 and been promoted as Kanungo (BPS-11) are senior to the appellant.

Para No.3: Partially correct. That DPC dated: 27/05/2018, appellant was included just for completion of the panels as during that time the appellants senior colleagues had not passed the Kanungo exam.

Para No.4: Partially correct. That as per Board of Revenue, Service Rules Notification No 1942/Estt: 1/135/SSRC dated: 23/01/2015 (copy enclosed). The criteria for promotion to the post of Kanungo are as "*By promotion on the basis of seniority-cum-fitness, from amongst the Patwaris and Naib Office Kanungos of the district concerned with three years service as such and who have passed the Departmental examination of Kanungo*". So, there is no time frame of passing of Kanungo exam.

Para No 5&6: Incorrect. That the DPC dated: 11/12/2020, has been conducted within the aforementioned notification and as per Seniority list maintained on date of appointment. So, the appellant is junior most official amongst all officials (Patwaris) who have been promoted to higher rank i.e. Kanungo (BPS-11). Furthermore foregoing seniority for promotion has been deleted vide Establishment Department Notification dated: 06/08/2020 (copy enclosed).

In view of the above it is prayed that appeal may be dismissed/rejected as no substance is available in the case.


Deputy Commissioner,
Kohat.

ATTESTED
Reminer Copy to
Department. Kohat
17-02-21

IN THE COURT OF COMMISSIONER, KOHAT DIVISION KOHAT

Appeal No 01/2021 dated 11-01-2021

Q/A

Kashif Jamal Patwari DC Office Kohat.....appellant

Versus

Deputy Commissioner, Kohat.....Respondents

APPEAL AGAINST THE ORDER NO 6550/DC-Kt/Estb dated 11-12-2020

§


The instant appeal has been filed by the appellant against the order of Deputy Commissioner Kohat dated 11-12-2020 whereby three No of patwaris were promoted to the post of kanungo on the basis of seniority cum fitness. According to the appellant, the impugned order is liable to be set aside on the ground that the appellant is senior to the promoted patwaris namely Miraj Khan and Musharaf Masood. The appellant has further contended that patwari Safdar Rehman previously forewent his promotion and as such he is not entitled for promotion as per Service Rule No 07(05). Accordingly, notices were issued and record/para-wise comments were requisitioned from DC, Kohat.

Appellant present. Rep of DC Kohat also present. Arguments heard and record alongwith para-wise comments, perused

The appellant contended that he had passed kanungo exam in 2016 whereas the respondent Miraj Khan and Musharf Masood had passed kanungo exam in 2019. According to the appellant, he was therefore senior to the respondents Miraj Khan and Musharaf Masood. As per service rule vide notification dated 23-01-2015, the post of kanungo is to be filled by promotion from amongst the patwaris having passed kanungo exam with at least three years service. As per section 17 of KP Service Rules 1989, the seniority of officials of the same cadre is to be determined according to the first entry in that cadre. Since the appellant was recruited later than the respondents Miraj Khan and Musharaf Masood, therefore he is definitely junior to the respondents. So far as sub-section 05 of Rule 07 is concerned, the same has been deleted vide Notification dated 06-08-2020. Hence the order of Deputy Commissioner Kohat dated 11-12-2020 is maintained and the appeal having no force is dismissed.

Announced
11-02-2021

COMMISSIONER
KOHAT DIVISION KOHAT


Reader To Commissioner
Kohat Division, Kohat

11

1	10-2002	Mohamud Ayub Khan s/o Mohamud Ayub Khan s/o Sami Gumbast, Madaya Bay Tel: +91 41 201111	3.3.1975	FA	26.11.1996	Director Land Bank order No. 2513PE-II/ 102-ENL of 4-9-2002 and DOR & ENL of 9.10.2002	Wage of farming the farmer's expense with out etc.	en us
2	1-2004	Kashif Samad Rana s/o Moh: Shino Kheer New Abadi Sarwanda Road, Kohat City.	15-1975	B.A	27-2-2003	DOR & E, Kohat order. Encl. No. 154/DOR dated 20-1-2004		
3	11-2004	Mirza Khan s/o Rang Khan s/o Banda Hama, 12, Dial, Kohat	13-5-1977	B.A	10-7-2004	DOR & ENL order No. 2694/DOR dt 26.11.04		

A. Annex

ATTSTEE
15/11/06
Department, Kohat

Kod
No. 5162
15/11/2016
172/13/13/05
dated 20-1-2004

message

Wage of farming

Spent Kod
Ration

12

B

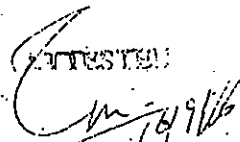
12

(APPENDIX G- (Forms)

FORM P-I--(Paragraph 3.6)

LIST OF PATWAR PASS PERSONS OF SUB-DIVISION _____ DISTRICT _____

1	2	3	4	5	6	7
SERIAL NO. OF ENTRY.	NAME, FATHER'S NAME, CASTE AND RESIDENT.	DATE OF BIRTH.	EDUCATIONAL QUALIFICATION.	DATE AND PLACE OF PASSING THE PATWAR EXAMINATION.	SIGNATURE OF OFFICER DIRECTING ONLY TO BE MADE WITH DATE.	REMARKS.
21-12-1995	Musharaf Mashhood S/o Maqbool Ahmed R/o Moh-Pir Abdullaah Shah Kohat City	5-3-1974	F-A	26-11-1996 D. c s Kohat in Kohat order dt-21-12-1995		Appointed G.S.C.

TESTED

 M. J. 1996
 Executive Copyist
 Department, Kohat

13

~~Amir Khan~~

OFFICE OF DISTRICT OFFICER REVENUE & ESTATE, KOHAT.

O R D E R.

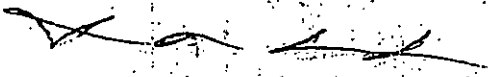
Mr. Kashif Jamal s/o Muhammad Mustaz
resident of Mohallah Shino Khel, New Abadi-Jarwanda Road,
Kohat Cantt is hereby enlisted as Patwari Candidate in
Kohat Tehsil with immediate effect.

District Officer Revenue & Estate
Kohat.

No. 154 /DOR

Dated 20-1-2004.

Copy forwarded to the Tehsildar, Kohat
for information and necessary action.


District Officer Revenue & Estate
Kohat.



14

ANNEX
"B"

OFFICE OF THE DISTRICT COORDINATION OFFICER, KOHAT.

P R O C E E D I N G S.

On the recommendation of Departmental Selection Committee, Mr. Kashif Jamal s/o Muhammad Muntasir s/o Muhammad Ahsan Khal, Tehsil and District Kohat, native candidate is hereby appointed as patwari in DPS-05 on the following terms and conditions:-

- 1) He will produce age and health certificate from Medical Superintendent Divisional Hospital, DDA.
- 2) His appointment will be on temporary basis and will be liable to be terminated with out any notice.
- 3) The period of probation will be 2-years from the actual taken over charge of the post.

-Sd/-

District Coordination Officer,
Kohat

No. 1802-08/SOR/KA.

Dated Kohat the 10-7-2006.

Copy forwarded to the:-

1. District Coordination Officer, Kohat.
2. Secretary, Board of Revenue, NWFP, Peshawar.
3. Director Land Records, NWFP, Peshawar.
4. District accounts Officer, Kohat.
5. Deputy District Officer, Revenue and Judicial, Kohat.
6. Tehsildar, Kohat/Naoni for necessary action.
7. Individual concerned for information & compliance.


District Officer,
Revenue & Estate, Kohat.

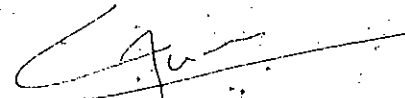
15

Annex
(c)

DIRECTORATE OF LAND RECORDS KHYBER PAKHTUNKHWA

TO WHOM IT MAY CONCERN.

This is to certify that Mr. Kashif Jamal Afridi s/o Muhammad Mumtaz Afridi, Patwari of District Kohat appeared in the Departmental Examination of Kanungo held in the month of November 2015 at Kohat and declared passed in all papers under R.No.121 vide Notification Endst: No. 3163-68/LR-I/DEK-Kohat ,dated, 15/01 /2016.



SUPERINTENDENT,
LAND RECORDS, KHYBER PAKHTUNKHWA

SUPERINTENDENT
Land Records
Khyber Pakhtunkhwa
Peshawar

Copy to the:-
Deputy Commissioner, Kohat for information please.

(16)

GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF LAND RECORDS

Peshwar dated the 15/10/2016.

ہالونو امتحان بتو

NOTIFICATION

No. 3162

J.L.R.-I/DEK/Kohat. The Director Land Records, Khyber Pakhtunkhwa has

been pleased to declared the following individuals to have passed/ failed in various papers of the Departmental Examination of Kamngos held from 26.27/11/2015 at Kohat.:-

S.No	District	Name of applicant	R. No.	Paper I 120/48.	Paper II 17/10	Paper III 17/10	Paper IV 60/24	Paper V 50/0	Remarks
1	Kohat	Musharaf Masood, Patwari	50	Fail	Pass	Pass	Fail	Pass	Failed
2	Kohat	Miraj Khan, Patwari	51	Fail	Pass		Pass	Pass	Failed
3	Kohat	Aslamdyar, Patwari	52	Fail	Pass	Pass	Fail	Pass	Failed
4	Kohat	Farez Khan, Patwari	53	Fail	Pass	Pass	Pass	Pass	Failed
5	Kohat	Safdar Rehman, Patwari	54		Pass	Pass			
6	Kohat	Mahammad Qasim, Patwari	55	Fail	Pass	Pass	Fail	Pass	Failed
7	Kohat	Fariq Hussain, Patwari	56			Pass			
8	Kohat	Amir Ahsan, Patwari	57			Pass			
9	Kohat	Farid Gul, Patwari	58	Fail	Pass	Pass	Pass	Pass	Failed
10	Kohat	Unwar Farooq, Patwari	59	Fail	Pass	Pass	Pass	Pass	Failed
11	Kohat	Azmatullah, Patwari	60	Fail	Pass	Pass	Fail	Pass	Failed
12	Kohat	Muhammad Asif, Patwari	61	Pass	Pass	Pass	Pass	Pass	Passed
13	Kohat	Mehran Gul, Patwari	62	Fail	Pass	Pass	Pass	Pass	Failed
14	Kohat	Nadir Khan s/o Nasim Gul	63	Pass	Pass	Pass	Pass	Pass	Passed
15	Kohat	Amir Ahsan s/o Nawab	64	Pass	Pass	Pass	Pass	Pass	Passed
16	Kohat	Fariq Hussain s/o Mosa Khan	65	Pass	Pass	Pass	Pass	Pass	Passed
17	Hangu	Abdul Ghaffar s/o Abdul Hameed, Patwari	66						
18	Hangu	Sanaullah Khan s/o Waris Khan, Patwari	67	Fail	Pass	Fail	Fail	Pass	Failed
19	Hangu	Syed Imtiaz Ali Shah s/o Syed Suraj Ali Shah, Patwari	68						
20	Hangu	Mohammad Iqbal s/o Onab Gul, Patwari	69	Pass	Pass	Pass	Pass	Pass	Passed
21	Hangu	Tajmal Khan s/o Silawar Khan, Patwari	70	Pass	Pass	Pass	Pass	Pass	Passed
22	Hangu	Noor Jamal s/o Mastanand Khan, Patwari	71	Pass	Pass	Pass	Pass	Pass	Passed
23	Hangu	Munassar Khan s/o Janat Gul, Patwari	72	Pass	Pass	Pass	Pass	Pass	Passed
24	Hangu	Abid Hussain s/o Ikhtiar Ali, Patwari	73						

D.C.

A.D.C

Br. *SP*

Dairy No. 429

Date 21/10/16

27

27	Hangu	Muhammad Zaheer-ud-Din s/o Zabat Khan	74	Fail	Pass	Pass	Fail	Pass	Failed
	Hangu	Momin Ali s/o Dostan Ali Patwari	75	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Haidar Habib s/o Habib Ali Patwari	76	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Muntazir Ali s/o Awan Ali Patwari	77	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Asir Muhammad s/o Khial Malook Patwari	78	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Salah-ud-Din Khan s/o Mastamand Khah Patwari	79	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Abdul Jamal Nasir s/o Musadig Hussain Patwari	80	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Obaidullah Khan s/o Rafiullah Khan Patwari	81	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Anjum Hanan s/o Abdul Hanan Patwari	82	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Sham-su-Zaman s/o Zermoch	83	Fail	Pass	Pass	Fail	Pass	Failed
	Hangu	Abdullah Shah s/o Rehmat Shah	84						
	Hangu	Zahidullah s/o Hazratullah Patwari	85	Pass	Pass	Pass	Pass	Pass	Passed
	Hangu	Muhammad Mujtaba Khan s/o Amanzeb	86	Fail	Pass	Fail	Fail	Pass	Failed
	Hangu	Abdul Wahab s/o Abdul Hahan Patwari	87						
	Hangu	Noorullah s/o Ghulam Nabi	88						
	Hangu	Hazrat Ali s/o Ghafar Ali Patwari	89	Pass	Pass	Pass	Pass	Pass	Passed
	Karak	Javed Iqbal No.III	90	Pass	Pass	Pass	Pass	Pass	Passed
	Karak	Hamayun Khan s/o Mashal Khan Patwari	91	Pass	Pass	Pass	Pass	Pass	Passed
	Karak	Hazratullah s/o Raghbat Shah Patwari	92	Pass	Pass	Pass	Pass	Pass	Passed
	Karak	Khurshid Iqbal s/o Abdul Muhammad Patwari	93	Fail	Pass	Fail	Pass	Fail	Failed
	Karak	Rehmatullah Patwari	94						
	Karak	Manz-ur-Rehman s/o Khan Shaur Patwari	95	Pass	Pass	Pass	Pass	Pass	Passed
	Karak	Miftah-ur-Rehman s/o Samiullah	96	Fail	Pass	Fail	Fail	Pass	Failed
	Karak	Miraj Ali s/o Gul Ali Patwari	97				Fail		Failed
	P.A. Kurrum	Asghar Hussain s/o Mukhtiar Ali Patwari	98	Fail	Pass	Fail		Fail	Failed
	P.A. Kurrum	Muhammad Zaman s/o Hussain Ghulam Patwari	99	Pass	Pass	Fail	Fail	Pass	Failed
	P.A. Kurrum	Israr Hussain s/o Hussain Ghulam Patwari	100	Pass	Pass	Pass	Pass	Pass	Passed
	P.A. Kurrum	Fida Hussain s/o Manzoor Hussain Patwari	101	Pass	Pass	Pass	Pass	Pass	Passed
	P.A. Kurrum	Harir Hussain s/o Dildar Hussain Patwari	102	Pass	Pass	Pass	Pass	Pass	Passed
	P.A. Kurrum	Shaukat Ali s/o Muhammad Younis Patwari	103	Pass	Pass	Pass	Pass	Pass	Passed

	P.A. Kurrām	Jamshaid Iqbal s/o Amiro Mian, Patwari	104	Fail	Pass	Pass	Fail	Pass	Failed
57	P.A. Kurrām	Dildar Hussain s/o Abdul Majan, Patwari	105						
	P.A. Kurrām	Imtiaz Khan s/o Hassan Khan, Patwari	106	Fail	Pass	Fail	Fail	Fail	Failed
58	P.A. Kurrām	Muhammad Mustafa s/o Muhammad Shah, Patwari	107	Pass	Pass	Pass	Pass	Pass	Passed
59	P.A. Kurrām	Imtiaz Hussain s/o Iqbal Hussain, Patwari	108	Pass	Pass	Pass	Pass	Pass	Passed
60	Kohat	Qaiser Shah s/o Nasrat Shah, Patwari	109						
61	P.A. Kurrām	Ghilaf Hussain s/o Israr Hussain, Patwari	110	Pass	Pass	Pass	Pass	Pass	Passed
62	Kohat	Sanazeb s/o Aurangzeb, Patwari	111	Pass	Pass	Pass	Pass	Pass	Passed
63	Kohat	Mohsin Iqbal, Patwari	112	Pass	Pass	Pass	Pass	Pass	Passed
64	Charsadda	Suliman, Patwari	113	Fail	Fail	Fail	Fail	Fail	Failed
65	Charsadda	Wajid Ali s/o Gul Faraz, Patwari	114	Pass	Pass	Pass	Pass	Pass	Passed
66	Karak	Amir Farooq s/o Ghulam Farooq	115	Pass	Pass	Pass	Pass	Pass	Passed
67	Karak	Adnan Farooq s/o Ghulam Farooq	116	Pass	Pass	Pass	Pass	Pass	Passed
68	Charsadda	Sijad Khan s/o Safdar Khan	117	Pass	Fail	Fail	Fail	Pass	Failed
69	Kohat	Syed Pervaiz Hussain Shah, Patwari	118	Pass	Pass		Pass	Pass	
70	Kohat	Asfandiyar, Patwari	119						
71	Kohat	Shurfiyar s/o Saifullah, Patwari	120	Pass	Pass	Pass	Pass	Pass	Passed
72	Kohat	Kashif Jamal Afridi s/o Muhammad Mumtaz Afridi, Patwari	121	Pass	Pass	Pass	Pass	Pass	Passed
73	Charsadda	Muhammad Sheraz s/o Gul Muhammad, Patwari	122	Pass	Pass	Pass	Fail	Pass	Failed
74	Kohat	Anwar Javed s/o Zarif Khan, Patwari	123	Pass	Pass	Pass	Fail	Pass	Failed
75	Kohat	Muhammad Waqar s/o Muhammad Nisar, Patwari	124	Pass	Pass	Pass	Pass	Pass	Passed
76	Kohat	Asif Shehzad s/o Muhammad Aman, Patwari	125	Pass	Pass	Pass	Pass	Pass	Passed
77	Kohat	Muhammad Kamran, Patwari	126	Pass	Pass	Pass	Pass	Pass	Passed
78	Charsadda	Salimullah, Patwari	127	Pass	Pass	Pass	Pass	Pass	Passed
79	Charsadda	Sirtaj Ahmad, Patwari	128	Pass	Pass	Pass	Pass	Pass	Passed
80	Buncr	Akhtar Ali Shah s/o Syed Usman Shah, Patwari	129	Fail	Pass	Pass	Fail	Pass	Failed
81	Buncr	Sani Mulla s/o Haji Mulla, Patwari	130	Fail	Pass	Fail	Fail	Pass	Failed
82	Charsadda	Abdur Rahim, Patwari	131	Pass	Pass	Pass	Pass	Pass	Passed
83	Charsadda	Sajid Ali, Patwari	132	Pass	Pass	Pass	Fail	Pass	Passed
84	Charsadda	Naseer Khan, Patwari	133	Pass	Pass	Pass	Pass	Pass	Passed
85	Charsadda	Ziaur Rehman, Patwari	134	Pass	Pass	Pass	Pass	Pass	Passed

19

19

86	Charsadda	Mukhtar Ahmad, Patwari	135	Pass	Pass	Pass	Pass	Pass	Passed
87	Karak	Said Rehman, Patwari	136	Pass	Pass	Pass	Pass	Pass	Passed
88	Karak	Amamullah, Patwari	137	Pass	Pass	Pass	Pass	Pass	Passed
89	Karak	Falak Naz, Patwari	138	Pass	Pass	Pass	Pass	Pass	Passed
90	Karak	Abdul Wase, Patwari	139	Pass	Pass	Pass	Pass	Fail	Failed
91	Karak	Abdul Ghaffar, Patwari	140	Pass	Pass	Pass	Pass	Pass	Passed
92	Karak	Muhammad Imran, Patwari	141	Pass	Pass	Pass	Pass	Pass	Passed
93	Charsadda	Shafiqullah s/o Rookhullah, Patwari	142	Pass	Pass	Pass	Pass	Pass	Passed
94	Charsadda	Alamzeb s/o Haji Bahader, Patwari	143	Pass	Pass	Pass	Pass	Pass	Passed
95	Chitral	Ali Akbar Taj s/o Mehri Ali Khan, Patwari	144	Pass	Pass	Pass	Pass	Pass	Passed
96	Chitral	Shafiqullah s/o Nazir Khan, Patwari	145	Pass	Pass	Pass	Pass	Pass	Passed
97	Chitral	Miraj Alam s/o Abdul Qayum, Patwari	146	Pass	Pass	Pass	Pass	Pass	Passed
98	Charsadda	Fahad Akbar s/o Jan Akbar, Patwari	147	Pass	Pass	Pass	Pass	Pass	Passed
99	Charsadda	Mujahid Shah, Patwari	148	Pass	Pass	Pass	Pass	Pass	Passed
100	Charsadda	Asif Saeed, Patwari	149	Pass	Pass	Pass	Pass	Pass	Passed
101	Kohat	Danish s/o Hafiez ur Rehman, Patwari	150	Fail	Pass	Pass	Pass	Pass	Failed
102	Kohat	Syed Arshiyamullah Shah, Patwari	151	Pass	Pass	Pass	Pass	Pass	Passed
103	Kohat	Syed Faisal Shah s/o Qaiser Shah, Patwari	152	Pass	Pass	Pass	Pass	Pass	Passed
104	Kohat	Inamul Haq, Patwari	153						
105	Kohat	Hasham Bashir s/o Bashir Ahmad, Patwari	154	Fail	Pass	Pass	Fail	Pass	Failed
106	Kohat	Irfan Khan s/o Suleman Khan, Patwari	155	Pass	Pass	Pass	Pass	Pass	Passed
107	Kohat	Zulfiqar Ali Shah, Patwari	156	Pass	Pass	Pass	Pass	Pass	Passed
108	Kurrum	Muhammad Yasen s/o Fazal ur Rehman, Patwari	157	Pass	Pass	Pass	Fail	Pass	Failed
109	Buner	Gul Sher Khan s/o Said Hakim Shah, Patwari	158	Pass	Pass	Pass		Pass	Failed
110	Buner	Bakht Sher s/o Sifr Ali, Patwari	159	Pass	Pass	Pass	Fail	Pass	Failed
111	Buner	Anwar Ali s/o Amir Nawab, Patwari	160	Pass	Pass	Pass	Pass	Pass	Passed
112	Buner	Said Imran s/o Fazali Rahman, Patwari	161	Pass	Pass	Pass	Fail	Pass	Failed
113	Charsadda	Kaleemullah s/o Fazal Subhan, Patwari	162	Pass	Pass	Pass	Pass	Pass	Passed
114	Charsadda	Javed Akhtar s/o Haji Gul, Patwari	163	Pass		Pass	Pass	Pass	
115	Swat	Habib Ahmad, Patwari	164	Pass	Pass	Pass	Fail	Pass	Failed
116	Kohat	Ahsan Mehmood s/o Abdullah Mehmood, Patwari	165	Pass	Pass	Pass	Fail	Pass	Failed
117	Kohat	Abdullah, Patwari	166	Pass		Pass	Fail	Pass	Failed
118	Charsadda	Shahid Khan s/o	167					Pass	

119	Kohat	Sahibzada Shahzad Khan s/o Abdul Khalig	168	Pass	Pass	Fail	Pass		
120	Kurram	Muhammad Farooq s/o Sardar Ali Khan	169	Pass	Pass	Fail	Fail	Pass	Failed
121	Charsadda	Muhammad Tahir s/o Ghulam Muhammad	170	Pass	Pass	Pass	Pass	Pass	Passed
122	Mansehra	Ahmad Abdullah s/o Muhammad Ilyas Quershi	171	Pass					
123	Kurram	Bismillah Khan s/o Gul Mat Khan	172	Fail	Pass	Pass	Fail	Pass	Failed
124	Mansehra	Sheraz Ahmad s/o Ghulam Sarwar	173	Pass	Pass				
125	Mansehra	Abdul Saboor Khan s/o Tahir-ul Mulk	174	Pass					
126	Kurram	Dildar Hussain s/o Sardar Hussain	175		Pass	Pass	Pass	Pass	
127	Chitral	Aamir Shahzad s/o Shahzada	176	Fail	Pass	Pass	Pass	Pass	
128	Kohat	Israr Khan s/o Baseer Khan	177	Fail	Pass	Pass	Pass	Fail	Failed
129	Kurram	Syed Adil Hussain s/o Syed Aqeel Hussain	178	Pass	Pass	Pass	Pass	Pass	Passed
130	Kohat	Inamul Haq s/o Abdul Hq. Patwari	179	Pass	Pass	Pass	Fail	Pass	Failed
131	Kohat	Syed Mushraf Shah s/o Syed Ghulam Shah	180	Pass	Pass	Fail	Fail	Pass	Failed
132	Charsadda	Waris Khan s/o Abdul Wadood	181	Pass	Pass	Pass	Pass	Pass	Passed
133	Kohat	Kamran Khan s/o Shafiq Khan. Patwari	182	Pass	Pass	Fail	Pass	Pass	Failed
134	Kohat	Faisal Shahzad s/o Muhammad Saddiq	183	Pass	Pass	Fail	Pass	Pass	Failed
135	Kohat	Aamir Naseer s/o Naseer Khan	184		Pass	Pass	Pass	Pass	Failed
136	Kohat	Imtiaz Ahmad Khan s/o Muhammad Akram Khan	185			Fail	Fail	Fail	Failed

DIRECTOR LAND RECORDS,
KHYBER PAKHTUNKHWA

Endr: No. 3163-68

L.R./IDEK/Kohat Div. Dated. /01/2016

Copy forwarded to the:-

- 1) Commissioner, Kohat Division, Kohat.
- 2) Deputy Commissioners/P.As concerned.
- 3) PS to Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
- 4) Government Printing Press.

DIRECTOR LAND RECORDS,
KHYBER PAKHTUNKHWA

(21)

Annex "D"

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD ON 29/05/2018 UNDER THE CHAIRMANSHIP OF DEPUTY COMMISSIONER KOHAT FOR SELECTION OF ONE PATWARI (BPS-09) TO THE POST OF KANUNGO (BPS-11).

The Departmental Promotion Committee meeting was held on 29/05/2018 under the Chairmanship of Deputy Commissioner Kohat for selection of one Kanungo (BPS-11) sanctioned for newly created Tehsil Gumbat amongst the Patwaris (BPS-09).

The following attended the meeting:

- | | |
|---|----------|
| a) Deputy Commissioner Kohat. | Chairman |
| b) Additional Deputy Commissioner Kohat. | Member |
| c) Accounts Officer Deputy Commissioner Office Kohat. | Member |
| d) Representative of Commissioner Office Kohat. | Member |
| e) Superintendent Deputy Commissioner Office Kohat. | Member |
| f) Tehsildar Kohat | Member |

The Service Books, Seniority List, Service Rules and Synopsis of ACRs of all eligible Patwaris were placed before Committee for selection of one Kanungo (BPS-11) against vacant post in Tehsil Gumbat. Under the rules the Kanungo post is filled amongst Patwaris who have passed Kanungo exam. From perusal of record, the following Patwaris were passed the said exam.

- | | |
|-------------------------------------|----------|
| 1. Safdar Rehman s/o Abdullah Khan | Patwari. |
| 2. Jehan Zeb Khan s/o Dauran Khan | // |
| 3. Sami Zeb s/o Aurangzeb | // |
| 4. Kashif Jamal s/o Muhammad Muhtaz | // |

The official at S No 1 was not willing to take promotion and written undertaking was obtained which was placed on file, while official No 2 (Jehan Zeb Khan) was willing to also fulfill the prescribed qualification as was required for the post under the rules.

The committee after thorough examination of all record, service rules as well seniority list /synopsis of ACRs recommend Mr Jehan Zeb Khan s/o Dauran Khan senior Patwari (BPS-09) for promotion as Kanungo (BPS-11) against vacant post with immediate effect.

[Signature]

Deputy Commissioner,
Kohat
(Chairman)

[Signature]

Additional Deputy Commissioner,
Kohat
(Member)

[Signature]

Accounts Officer DC Office,
Kohat
(Member)

[Signature]

Representative of Commissioner Office,
Kohat
(Member)

[Signature]

Superintendent DC Office,
Kohat
(Member)

[Signature]

Tehsildar Kohat
(Member)

ATTESTED

Examiner Copying
Department, Kohat



22

Annex
"E"

OFFICE OF THE
DEPUTY COMMISSIONER, KOHAT

No. F.O. /DC(K)/Rev. Famb
Dated: 11/1 /2019

OFFICE ORDER.

Due to exigency of services, the following senior most Patwaris of Kohat district are hereby assigned duty of Girdawar / ADK purely on temporary basis with immediate effect in the larger Public interest. They are directed to assume charge of the post of ADK in the office District Kanungo Kohat forthwith and submit compliance report:-

- 1) Mr. Sanazeb Patwari Halqa Lachi Payan.
- 2) Mr. Kashif Jamal Afridi, Patwari Halqa Lachi Bala.

DEPUTY COMMISSIONER,
KOHAT

Ends: of even No & date.

Copy forwarded for information to the:-

- 1) Addl. Deputy Commissioner, Kohat.
- 2) Assistant Commissioner, Kohat.
- 3) Tehsildar Kohat / Lachi.
- 4) District Kanungo Kohat.
- 5) Officials concerned for strict compliance.

DEPUTY COMMISSIONER,
KOHAT

23

Annex
"F"



OFFICE OF THE
DEPUTY COMMISSIONER
KOHAT



No. 825 /DC-K/Estb:

Dated 27/03/2019

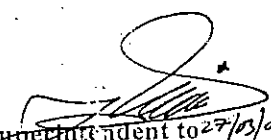
To
The Director Land Record,
Board of Revenue,
Khyber Pakhtunkhwa, Peshawar.

Subject:- NOC FOR APPEARANCE IN NAIB TEHSILDAR EXAMINATION.

Memo: Kindly refer to your office letter No. 249-73LR-1/Dent/2018 dated: 17/10/2018.

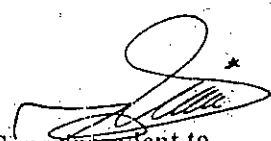
I am directed to state that this office has no objection regarding following officials for enrollment in appearance in the departmental examination of Naib Tehsildar, please.

1. Mr. Faheem Shah, Kanungo.
2. Mr Sanazeb, Kanungo.
3. Mr. Kashif Jamal Afridi, Kanungo.


 Superintendent to
 Deputy Commissioner,
 Kohat

Copy forwarded for information to the:

1. Additional Deputy Commissioner Kohat.


 Superintendent to
 Deputy Commissioner,
 Kohat

52

OFFICE OF THE
DEPUTY COMMISSIONER
KOHAT

(Under protest)

ANN SC
"R"

Dated 8/1/2020
No. 1528 DC/KT

OFFICE ORDER

The following posting/order of revenue staff is hereby made with immediate effect in the best public interest :-

No	From	To
1	Shirka (Additional charge) Kohat	Shirka (Additional charge) Kohat
2	Shirka Kohat	Shirka Kohat
3	Shirka Kohat	Shirka Kohat
4	Shirka Kohat	Shirka Kohat
5	Shirka Kohat	Shirka Kohat
6	Shirka Kohat	Shirka Kohat
7	Shirka Kohat	Shirka Kohat
8	Shirka Kohat	Shirka Kohat
9	Shirka Kohat	Shirka Kohat
10	Shirka Kohat	Shirka Kohat

Note: The above order is directed to ensure the additional charge of Muslim Aab to the...

[Signature]
Deputy Commissioner
Kohat

[Signature]
Deputy Commissioner
Kohat

- CC
- The Addl. Deputy Commissioner, Kohat
- The Assistant Commissioner, Kohat
- The Tehsildar, Kohat
- The DC, Kohat
- Superintendent, Establishment, Kohat
- Official in charge of compliance

No: 37/DK
10-09-2020

24-A



OFFICE OF THE
DEPUTY COMMISSIONER KOHAT.

No. 5716 /DC-K/Estb

Dated 29/09/2020

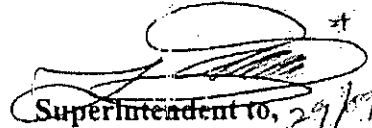
Attested
\$

To
The Secretary to Commissioner
Kohat Division Kohat.

Subject: - APPLICATION.

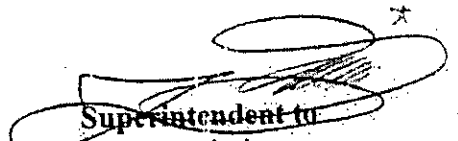
Memo: Kindly refer to your office letter No 1783/RA/Cmr-Kt dated 28/09/2020.

I am directed to refer to the subject cited above and state that this office posted the official Mr Kashif Jamal Patwari (BPS-09) to ADK on OPS basis. Later on his services were no more required to this office due to which he has been reverted to his original post and posted as Patwari in Halqa Darmalak vide this office order No 1258/DC-Kt dated: 08/09/2020.


Superintendent to, 29/09/20
Deputy Commissioner,
Kohat

Copy forwarded for information to the:

1. Deputy Commissioner Kohat.
2. Additional Deputy Commissioner, Kohat.
3. Kashif Jamal Patwari, DC Office Kohat, w/r to his application.


Superintendent to
Deputy Commissioner,
Kohat

25

Annex "B"

Annex



Handwritten text in Urdu, possibly a title or header, partially obscured by the logo.

Handwritten text in Urdu, likely a sub-header or introductory sentence.

Handwritten text in Urdu, first line of the main body.

Handwritten text in Urdu, second line of the main body.

Handwritten text in Urdu, third line of the main body.

Handwritten signature or name on the left side.

Handwritten signature or name on the left side.

14/3/19

Handwritten signature and date 14/3/18 on the right side.

Stamp: Executive Cashier, Department, Keshi

26

26

Annex

74

گزارش کے تحت صدر علی نقوی کے نام

Annex "9" کے بارے میں (تقریباً) مقررہ کارروائی کے لیے

حاجت ہے

لہذا صحیح پرورش سے ایشیا کے بارے میں

مشاورت

اور میری حکمت پر دوسرا نسخہ نقوی کی پرورش
نرمی کا رشتہ دار ہے۔ میرا کوئی بندہ ان کے پاس ہے

کنڈا علی احمد صاحب
9/6/51

ATTESTED
Deputy Commissioner, Kohat

Attested
Kohat
Superintendent
Deputy Commissioner Kohat
9/6/51



(27)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)

Dated Peshawar, the 22nd October, 2011

NOTIFICATION

No. SOR-VI (E&AD) 1-3/2009/Vol-VIII: - In exercise of the powers conferred by Section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), read with this Department's Notification No. SOR-III (S&GAD) 1-206/74/Vol-V, dated 18th April 1969, the Chief Minister of the Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following further amendments shall be made, namely:-

AMENDMENTS

1. In Rule-7, after sub-rule (4), the following new sub-rule shall be added, namely:-

(5) If on an order of promotion or before promotion any civil servant declines in writing, to accept promotion, such civil servant shall not be considered for such promotion for the next four years following the order:

Provided that if he declines to avail the benefit of promotion for the second time, then he shall stand superseded permanently for such promotion.

2. In rule 9, sub-rule (2) shall be deleted.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER
PAKHTUNKHWA

Serial No. and dated even.

- Copy forwarded to -
1. Additional Chief Secretary, Govt of Khyber Pakhtunkhwa, Planning & Development Department.
 2. Additional Chief Secretary (P.N.M.) PATA Secretariat Peshawar.
 3. The Joint Member, Board of Revenue, Khyber Pakhtunkhwa.
 4. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
 5. The Secretary to Governor, Khyber Pakhtunkhwa.
 6. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
 7. The Registrar, Peshawar High Court, Peshawar.
 8. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
 9. The Director General, Provincial Disaster Management Authority.
 10. All Additional Secretaries, Deputy Secretaries and Section Officers in Establishment & Administration Department.
 11. Private Secretaries to all Provincial Ministers in Khyber Pakhtunkhwa.
 12. Private Secretary to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
 13. Private Secretary to Secretary Establishment Department.
 14. Private Secretary to Secretary Administration Department.
 15. The Incharge Resource Centre, Estt & Admn. Department.
 16. The Manager, Government Printing and Stationary Department for Publication in the official Gazette and supply of 20-copies thereof at an early date.

(ASHTAQ KHAN)
SECTION OFFICER (REG: VI)

Annex
"D"

Annex 1/16
28

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE REVENUE AND ESTATE DEPARTMENT.

NOTIFICATION
Peshawar, dated 23-01-2015

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 read with the Cabinet Division Notification No. SRQ 457(1)/2001 dated 26th June, 2001 and in supersession of all previous rules issued in this behalf by the Revenue and Estate Department, in consultation with the Establishment and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 7 of the Appendix to this Notification and applicable to posts born on the cadre strength of Revenue and Estate Department specified in column 2 of the said appendix:-

APPENDIX

1	2	3	4	5	6	7
S.No	Notification of post	Appointing Authority	Minimum Qualification for appointment by initial recruitment or by transfer	Minimum Qualification for appointment by promotion	Age limit	Method of recruitment
1	Establisher (APS 16)	Administrative Secretary (SMBR)	Second class Graduation from any University recognized by the Higher Education Commission	Deleted	21 - 30 years for initial recruitment	(a) Twenty percent by initial recruitment and Sixty percent by promotion, on the basis of joint seniority cum seniority from amongst Naib Tehsildars, District Revenue Accountants, District Kamungos and Sub-Registrar with at least five years service. (b) (c) Twenty percent by promotion on the basis of joint seniority cum seniority from amongst Assistants of the office of Board of Revenue, officers of Commissioners, Deputy Commissioners and Political Agents having five years service as such.

29

1	2	3	4	5	6	7
	Member to Senior Member / Members Board of Revenue	Administrative Secretary (SMBR)				By transfer from amongst the Tehsildars
1.9	Inspector of Stamps	Administrative Secretary (SMBR)				By transfer from amongst the Tehsildars
2	Naib Tehsildar (BPS 14)	Administrative Secretary (SMBR)	Second class Graduation from any University recognized by the Higher Education Commission	Deleted	21 - 30 years For initial recruitment	(a) Fifty percent by initial recruitment, through NWFP Public Service Commission based on the result of a Competitive Examination conducted by it in accordance with syllabus; and (b) twenty five percent by promotion on the basis of Seniority - cum - fitness from amongst Kanungos with at least Five Years Service as such, who have passed the Departmental Examination of Naib Tehsildar. (c) fifteen percent by promotion, on the basis of joint Seniority - cum - fitness from amongst Senior Clerks of the office of Board of Revenue, Commissioners and Deputy Commissioners Offices in the Division concerned; and (d) Ten percent by promotion on the basis of seniority cum fitness from amongst Junior Clerks as Political Muharrirs of the offices of Political Agents with atleast ten years service.
3	District Kanungo (Saddar Kanungo) (BPS 14)	Administrative Secretary (SMBR)				By promotion on the basis of seniority-cum-fitness, from amongst the Kanungo of the concerned District with at least three years service as such
4	Head Clerk Revenue (BPS - 14)					By transfer from amongst Naib Tehsildar (Deleted) (Post has been abolished)

30

2	3	4	5	6	7
District Revenue Accountant (BPS 14)	Administrative Secretary (SMBR)				By promotion, on the basis of seniority-cum-fitness, from amongst the T. Accountant of the district with at least three years service as such.
6. Kanungo (BPS - 11)	District Collector				By promotion, on the basis of seniority-cum-fitness, from amongst the <i>Patwaris</i> and Naib Office Kanungos of the district concerned with three years service such and who have passed the Departmental examination of Kanungo.
7. Tehsil Accountant	District Collector				By promotion on the basis of seniority-cum-fitness from amongst the Naib Tehsil Accountants having three (03) years service as such.
8. Patwari (BPS - 09)	District Collector	Intermediate or equivalent qualification, who have passed the Patwar Examination.		18 to 35	"By initial appointment from amongst the Patwar passed candidate entered the Tehsil patwar candidate register maintained by District Collector of district concerned.
9. Naib Office Kanungo	District Collector				By transfer from amongst the Naib Office Kanungos of the district concerned.

Sd/-
 SECRETARY TO GOVERNMENT
 REVENUE AND ESTATE DEPARTMENT

18

30-A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No 1060/2018

Kashif Jamal s/o Muhammad Mumtaz, Patwari / Record Lifter Office of the Deputy Commissioner, Kohat.

(Appellant)

VS

1. Senior Member Board of Revenue, Khyber Pakhtunkhwa Peshawar.
2. Commissioner Kohat Division Kohat.
3. Deputy Commissioner Kohat.
4. Additional Deputy Commissioner, Kohat.
5. Additional Assistant Commissioner (Rev) Kohat.
6. Sana Zeb s/o Aurengzeb r/o Sector N0 3 KDA, Kohat.

Attested
B

(Respondents)

Joint Parawise Comments on behalf of Respondents are as under:-

PRELIMINARY OBJECTIONS:-

1. That the appellant has no cause of action or locus standi.
2. That the appellant has not come to the Tribunal with clean hands.
3. That the appellant has been estopped by his own conduct to file the instant appeal.
4. That the appeal is badly time barred.
5. That the appeal is not maintainable in its present form.
6. That the appeal is bad for misjoinder and non joinder of necessary parties.

FACTS:

Para No1: Correct. That the appellant has good academic qualifications according to prescribed qualifications for the post of Patwari.

Para No 2: Partially Correct. That the appellant after undergoing the necessary Patwar course appear in Patwar examination and according to result announced on 26/11/1996 he failed Patwar exam. His name was enlisted in Patwar pass persons on serial No 22 on dated 20/01/2004 via DOR&E, kohat order Endst: No 154/DOR dated 20/01/2004, after passing Patwar Exam on 27/02/2003 held in Karak. (Copy of the result 26/11/1996 and 20/01/2004 are "A" and "B".)

Para No 3: Correct. That the petitioner appear in the Patwar exam and passed all the papers and declare successful in year 2003 and his name was placed in seniority list of Patwaries.

Para No 4. Incorrect. That the appointments made by Departmental Selection Committee via its order in 08/05/2006 were made keeping in view rules and regulations and no malafied intentions were involved in the selection process. (Copy of regular appointment is "C".)

Para No 5. No comments.

Para No 6. Correct. That according to rules for further promotion from the post of Patwari to Kanungo the candidates must pass the departmental exam and must also have three years experience as such after passing the exam. (Copy of the rules is "D").

NXT
15/02/09

Para No 7: Correct. That the appellant appeared in departmental exam and declared successful and placed at the seniority of candidates who passed the exam of Kanungo.

Para No 8: Incorrect. That the respondent No 6 Sanazeb name was placed above the applicants name during the meeting of Departmental Selection Committee held on 20/05/2018 for appointment against the vacant post of Kanungo as Respondent No 6 entry into government service is 08/05/2006 while that of appellant is 11/07/2006, therefore Sanazeb (Respondent No 6) is senior to the appellant. (Copy of the seniority list as well as appointment order of Sanazeb is "E" and "F").

Para No 9: Incorrect. Seniority of Patwari are commenced from date of regular Patwari and not from passing departmental examination on indiraji nam register.

Para No.10: Incorrect. That the seniority is determined by entry into government service and the seniority list of the Patwari through the selection processed held on 29/05/2018 is according to law and rules.

Attested
B

GROUND:

- A. Incorrect. That the appellant has been treated in accordance with law.
- B. Incorrect. The seniority list is prepared in the month of December every year and issued and circulated in the month of January every year so if the appellant had any objections over his seniority then why had not he raised this objections since his appointment in 11/07/2006.
- C. Incorrect. The Establishment Section of Deputy Commissioner Office ask the reporting officers annually to submit ACRs of their subordinates for onward submission to the countersigning officer.
- D. Incorrect. The appellant failed his Patwar exam in 1996 while his passing colleagues were placed senior to him as they entered into government service before the appellant.
- E. Incorrect. The seniority of sanazeb is due to his entry into government service on date 08/05/2006 as compare to appellant entry into government service on 11/07/2006.
- F. Incorrect. It is the Departmental Promotion Committee comprising of Deputy Commissioner, Additional Deputy Commissioner, Representative of Commissioner Office and Tehsildar which determines suitable candidate for promotion following established rules.
- G. Incorrect. That seniority list is determined by entry into government service though the appellant has passed the exam but Departmental Promotion Committee put the seniors on top in panel.
- H. Incorrect. That the procedure followed is completely lawful.
- I. Incorrect. That not a single candidate of other districts had been adjusted and placed senior to the appellant in the seniority list.

J. Incorrect. That the appellat had failed his Patwar exam in 1996 while his other colleagues who had passed exam and entered into government service before him had been placed senior to him as per established rules and regulations.

K. No Comments.

L. As per Para above.

M. As per Para above.

Attested
B

Senior Member Board of Revenue
Govt of KPK Peshawar.

Commissioner Kohat Division Kohat

Deputy Commissioner Kohat.

Additional Deputy Commissioner Kohat.

Additional Assistant Commissioner (Rev), Kohat.



31

OFFICE OF THE
DEPUTY COMMISSIONER
KOHAT.

Annex
"L"

No 6550/- /DC-KT /Estb

Dated 11/12/2020

OFFICE ORDER

In pursuance of minutes of the meeting of Departmental Promotion Committee and its recommendations, dated 09-12-2020, the following three (03) Nos of Patwari BPS (09) are hereby promoted as Kanungo BPS (11) against the vacant post with immediate effect.

S.No	Name	Designation	Promoted as
1.	Safdar Rehman s/o Abdullah Khan	Patwari (BPS-09)	Kanungo (BPS-11)
2.	Musharraf Masood s/o Maqbool Ahmad	Patwari (BPS-09)	Kanungo (BPS-11)
3.	Miraj Khan s/o Abdul Rauf Khan	Patwari (BPS-09)	Kanungo (BPS-11)

TERMS & CONDITIONS:-

- The officials will be on probation for a period of one year and will be reverted to lower scales if their performance is found unsatisfactory.
- Their seniority will be maintained/fixed with other Kanungos in accordance with their date of promotion.
- They can be transferred/posted anywhere in the District.


Deputy Commissioner
Kohat

Copy forwarded for information to the:

1. Additional Deputy Commissioner, Kohat.
2. Additional Deputy Commissioner, (F&P) Kohat
3. Secretary to Commissioner, Kohat Division Kohat.
4. District Comptroller of Accounts, Kohat.
5. Assistant Commissioner, Kohat
6. Assistant Commissioner, Lachi.
7. Account Officer, DC Office Kohat.
8. Superintendent to Deputy Commissioner, Kohat.
9. Official concerned for compliance.


Deputy Commissioner
Kohat

(32)

Annex * 50 *
"M"

خدمت جناب ڈپٹی کمشنر صاحب کے محترمہ کو صاف
لو اسٹاف جناب سپرٹنڈنٹ صاحب کے محترمہ کو صاف

عنوان: محکمہ ایمل بر خلاف آفس آرڈر نمبر
No: 6557/DC-KT/11/2020
Dated: 11/12/2020
بمبارد کا عدم اختیار اور منسوخ فرمانے۔

سائل کا سٹف جمال سابقہ ADK حال تعیناتی مجھے بتواری۔

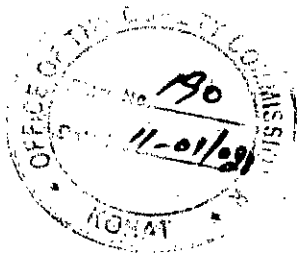
(ایسٹنٹ)

Under Protest

بنام

Est b دفتر

(ایسٹنٹ)



جناب عالی۔۔۔

لقد احتراماً گزارش ہے کہ ایمل عنوان بالا آرڈر جاری ہے۔

- 1- یہ کہ سائل نے سناریو کے خلاف جسے عذابہ طور پر ایمل جینرل
سرورس ٹریسٹنگ ڈی بی ڈی آرڈر یا ٹی آرڈر سے ایمل نمبر 2018/1060
بعض ان ایمل کا سٹف جمال بنام SMBR دائر کر رکھی ہے۔
جو کہ تاحال بدستور زیر سماعت و زیر تجویز ہے اور جس میں
آئندہ تاریخ نمبر 08/03/2021 ہے۔

- 2- یہ کہ بدوران زیر سماعت ایمل بر خلاف سناریو جو کہ تاحال
زیر تجویز و زیر سماعت ہے نیز یہ عنوان بالا آفس آرڈر نمبر
03 جو پٹر نمبر 11/2020 (قانونی و سیکریٹری) کو مجھے
قانونی (BPs-11) (out of turn) ترمیم دی
گئی ہے۔ لہذا برخلاف عذابہ خلاف قواعد صریحاً خلاف آراء ہے۔

PTO

3- فن سائل ایمل گزارے جملہ قانونی سہارا کی حقوق متاثر کیے گئے ہیں اور بلا جواز جملہ قانونی تقاضوں کو پس پشت سے ڈاکٹر فن سائل کی حقوق تلفی کی گئی ہے اگرچہ قبل ازین مورخہ 29/05/2018 کو منفقہ DPCC قانوننگوان کی نیشنل آف دی ہسٹنگ میں بھی فن سائل کا نام زیر غور وزیر پنجونہ رہا ہے اور جسکی توہینوں نما نذرہ کشتر صاحب نے بطور ممبر ممبر تعلیق بھی نسبت کی ہوئی ہے۔ قابل غور طلب ہے۔

4- یہ کہ فن سائل کا شرف جمال نے مورخہ 2016-01-15 کو امتحان قانوننگو پاس کیا ہے اور مطالبی نافذ العمل رولز 03 سال کا نام پیر پیر مورخہ 2019-01-15 کو پورا کیا ہوا ہے مذکورہ رولز زیر سماعت سے اسل سے شامل عدالتی مثل میں غیر مجتبیٰ قانوننگو (BPS-11) کی پانے والے دیکھ کر اور اسل کے زیر 15/12/2016 کے رولز سے قانوننگو میں قبل متصرف ہیں۔

5- یہ کہ مذکورہ آفس آرڈر نمبری: No: 6550/DC-KT/Estb
Dated: 11/12/2020

نافذ العمل رولز - قواعد و ضوابط اور پیرا میٹرز سے ہر لحاظ سے مستقام و متساوی ہے اسلئے فی الفور کا قدم اختیار کرنا ناگزیر ہے، منسوخ فرمایا جائے بغیر وجوہ سے بھی قانونی تقاضے کو پورا نہیں کیا جائے۔ چونکہ ایمل زیر سماعت برخلاف سبائٹ جوہرہ بحال رہوس پٹر پینل بشاد رہائی کورٹ سے زیر پنجونہ زیر سماعت سے ہے اور نافذ العمل رولز شامل عدالتی مثل ہیں۔

6- یہ کہ مذکورہ آفس آرڈر نمبری: No: 6550/DC-KT/Estb
Dated: 11/12/2020 کے تحت جن میں 03 پٹواربان کو مجتبیٰ قانوننگو (BPS-11) پٹواربان دیا گیا ہے۔ وہ درجہ نافذ العمل رولز - قواعد و ضوابط سے مستقام اور متساوی ہیں۔

PT 6

#05

X
-6
-13

... اول انٹرنیشنل کے قانون کو (BPS-11) ترقی پانے والا گھنڈر رحمان
02 سرگرمی محکمہ سرگرمی قانون کو پیرویشن لینے سے انکاری ہوئی ہے۔ شامل زیر سماعت
اپیل پر عدالتی فیصلے ہے۔

دوران سماعت رد لنز میں سرگرمی کو جواز بنا کر مجھے قانون کو ترقی
دی گئی ہے اگرچہ بدوران سماعت کسی بھی قسم کی رد لنز میں سرگرمی منسوخ
عدالت کے سامنے ناقابل تیز ترقی ہے چونکہ عدالت بہر صورت بالاد فوری ہے۔

... دوئم انٹرنیشنل مسٹریٹ مسعود اور سوئم انٹرنیشنل سراج خان نے امتحان
قانون کو مورخہ 2019-02-15 کو پاس کیا ہے اور مجاہد ناظرا نقل روکن
دونوں پر 03 سال بائٹائم پیرنڈ مسعود 2022-02-15 کو پورا

دعویٰ کے ساتھ رد لنز - قواعد و ضوابط سے متصادم قرار پائے ہیں -
سرگرمی انٹرنیشنل مسعود مورخہ 15-01-2020 کے قانون کو میں تسلیم شدہ ہیں -
اسد عابد مندورہ سڈارٹہ آفس آرڈر نمبر 11/12/2020

NS: 6550/DC-KT/Estt
Dated: 11/12/2020

کا عدم و نسخہ کثیرانے کے احکام صادر فرمائے جائیں چونکہ میں اپیل گزار
پورے ضلع کو بائٹے میں بحفاظت قانونی و سٹینڈی سٹریٹ ترقی شوری اور
ناظرا نقل روکن کے پیرا میٹرز پر بحفاظت سے پورا اترتا ہوں۔
مجھے قانون کو (BPS-11) ترقی کا اپیل و حقدار ہوں ترقی دے کر جائز
دادرسی بجا دئے۔

الغرض

اپیل گزار میں کاشف جمال آفریدی سابقہ قانون کو حال شوری عدالت درمیں تحصیل لایے ضلع کو بائٹ
نیز صیغہ آگاہی میراٹے اطلاع پانے سے اجزی توجہ ملی۔
1- جناب کسٹمر صاحب کو بائٹ ڈریننگ کو بائٹ۔
2- سرگرمی شریونل بونٹ سلمان / عزیز بوت۔
08/01/2021
ماشعہ شوری عدالت درمیں
03 اگست



(35) ANNEX N
OFFICE OF THE
DEPUTY COMMISSIONER KOHAT.

No. 249 /DC-K/Estb

Dated 21 / 01 / 2021

To

Mr Kashif Jamal, Patwari,
Patwar Halqa Darmalak.


Subject: - **APPLICATION.**

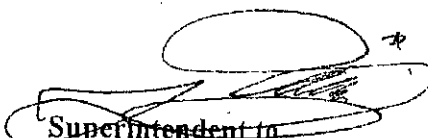
Memo: Kindly refer to your application No 190 dated 11/01/2021.


I am directed to refer to the subject cited above and state that the seniority of patwaries to further promotion i.e. Kanungo is considered from the date of their appointment as regular Patwari. It does not matter if a Patwari higher in rank passes Kanungo exam later than the Patwari lower in rank. So all the patwaries who have been considered for promotion in the DPC dated: 11/12/2020 and been promoted as Kanungo (BPS-11) are senior to you.

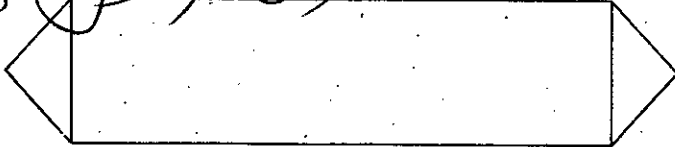
Copy forwarded for information to the:

1. Deputy Commissioner Kohat.
2. Additional Deputy Commissioner, Kohat.


Superintendent to,
Deputy Commissioner,
Superintendent
Deputy Commissioner
Kohat.


Superintendent to
Deputy Commissioner,
Superintendent at
Deputy Commissioner
Kohat.

ATTESTED

Zaidine Beyleng
Assistant Commissioner
Kohat
22-01-21



2021ء منجانب ایبلٹ

SMBR

کشف جمال بنام

مورخہ
مقدمہ
دعوی
جرم

Service Appeal

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام لٹیاور کیلئے عبدالکریم "سری" الدولہ کے سرگرم کوٹ مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرایں 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 مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔




کشف جمال ولد محمد مہار
Rushid
Appellant

المرقوم 19 ماہ فروری 2021ء

Accepted

عبدالکریم الدولہ کے لئے منظور ہے

مقام لٹیاور

50 روپے	71419			
ایڈویکٹ: <u>فضل شاہ مندر ASC</u>				
بار کونسل ایسوسی ایشن نمبر: <u>105547</u>				
رابطہ نمبر: <u>03339214136</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

بعدالت جناب: سروس ٹریڈنگ اور

مخانب: <u>6</u> Register No.:	دعویٰ: <u>S.A: 3243/202</u>
نام شخص/حاصل	عنوان: _____
بنام	صوبہ: _____
SMBR معتمد	جہیز: _____
	تھانہ: _____

بابت تحریر آنکہ

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

المرقوم: 21/7/21

العبد _____ واد شد _____
مقام _____ کے لیے منظور ہے۔

Attested & Accepted

(Adv)

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

عزیز خان ولد بہادر خان

Accepted

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR



In Re Civil Appeal # _____

Kashif Jamal

Versus

SMBR and others

PARA WISE COMMENTS ON BEHALF OF
RESPONDENTS NO.5

Respectfully Sheweth,
Preliminary Objections:

1. That the appeal of the appellant is not maintainable in its present form.
2. That the appellant is estopped by his own conduct to file the instant appeal.
3. That the appellant has got no cause of action to file the present appeal.
4. That the appeal is bad for misjoinder and non joinder of necessary parties.
5. That the appeal of the appellant is badly time barred.
6. That this Hon'ble Court has got no jurisdiction.

ON FACTS:-

Para No.1 of the appeal pertains to record and needs proof.

- i. Incorrect.
 - ii. Incorrect, ^{appellant} appeared but failed in patwar exams.
 - iii. Correct only to the extent the appellant passed Patwar examination on 27.02.2003 while respondent No.5 passed patwar exam on 26.11.1996.
 - iv. Correct while respondent No.5 appointed as patwari on 25.06.2002.
 - v. Pertains to record
 - vi. Incorrect.
 - vii. Pertains to record.
 - viii. Correct because court observations against appellant and order dated 08.09.2020 is legal (Copy of order sheet is attached).
2. Incorrect
 3. Pertains to record.
 4. Incorrect . /

5. Incorrect

6. Pertain to record.

7. Incorrect.

Grounds:-

A. Incorrect

B. Incorrect.

- i. Incorrect
- ii. Pertain to record.
- iii. Incorrect
- iv. Pertain to record.
- v. Pertain to record.
- vi. Incorrect.

D. Incorrect. The seniority of patwari to further promotion to kanungo is considered from the date of their appointment as regular patwari.

It is therefore requested that on acceptance of the parawise coments the appeal of the appellant may kindly be dismissed with cost.

Respondent No.5

In person



BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In Re Civil Appeal # _____

Kashif Jamal

Versus

SMBR and others

Affidavit:

I, Musharaf Mushood S/o Maqbool Ahmad R/o Mohallah Pir Abdullah Shah Kohat City, do hereby solemnly affirm and declare on oath that contents of the instant written statement are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

CNIC# 14301-1939068-9

Musharaf Mushood
ATTESTED



Musharaf Mushood
12-07-2021

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Kashif Jamal

VR

SMBR etc



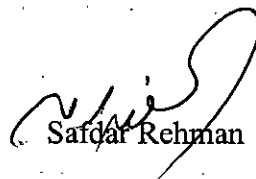
Subject: Parawise comments in appeal No. 3243/21 title as Kashif Jamal VS SMBR etc

R/Sir,

1. That the respondent No.4 refuse promotion due to his domestic problems because the mother of the respondent No. 4 is seriously ill by the reason respondent No.4 refuse his promotion in twice .
2. That the petitioner Kashif Jamal is not next senior from respondent No. 4. Respondent No.4 qualified his Qunoongo exam prior to the petitioner is so junior then Respondent No.4 For the reason petitioner Kashif Jamal is not entitled to file the present petition before this Hon'ble court.
3. That the respondent No.4 legally qualified his qualification therefore respondent No.4 appointed (Promoted) as office Qunoongo in district Kohat.

In view of the above it is prayed that appeal may please be dismissed rejected as no substance is available in the case. All concerned documents are attached herewith petition of the petitioner.

Dated 09-07-2021


Safdar Rehman

Respondent No.4
Office Qunoongo Kohat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 3243/2021

Kashif Jamal

VERSUS

SMBR ETC

AFFIDAVIT

I, Safdar Rehman S/o Abdul Jan R/o Office Qunoongo, Kohat City, ,
do hereby solemnly affirm and declare on oath that all the
contents of instant **PARAWISE COMMENTS** are true and correct to
the best of my knowledge and belief and nothing has been
concealed or misstated from this Honourable Tribunal.

Deponent


SAFDAR REHMAN

CNIC # 14301-8500439-1

Contact # 0333-4742916



BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No 3243/2021

Kashif Jamal.....Appellant.

V E R S U S

SMBR & Others.....Respondents

I N D E X

S.No	Description of documents	Annexure	Pages
1.	Reply with affidavit		1-3
2.	Copies of Seniority Lists & Appointment order	A & A/1	4-17
3.	Copy of Patwar Appointment Rules 1963, Land Record Manual & Notification dated 27-11-2001	B, C & D	18-28

Dated:- _____


Respondent No 6

Through


FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

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- 1 -

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No 3243/2021

Kashif Jamal.....Appellant

VERSUS

SMBR & Others.....Respondents

COMMENTS ON BEHALF OF RESPONDENT NO 6

Respectfully Submitted:-

Preliminary objections:

1. That the appellant has got no cause of action and locus standi to file instant appeal.
2. That the Instant appeal is not maintainable in its present form.
3. That the appellant is estopped by his own conduct to bring instant appeal.
4. That the appellant has not come to this honorable Tribunal with clean hands.
5. That the appellant has concealed material facts from this honorable tribunal.
6. That this honorable Tribunal has got no jurisdiction to entertain and adjudicate upon the matter.
7. That the appeal is bad due to non-joinder and mis-joinder of necessary parties.
8. That appeal of the appellant is time barred.

PARAWISE COMMENTS ON FACTS

1. Para No 1 pertains record.

I. Para under reply pertains to record.

II. Para under reply pertains to record.

III. Para under reply pertains to record.

IV. Para under reply pertains to record.

V. Para under reply pertains to record.

VI. Para under reply is misconstrued and incorrect as the appellant has concealed material facts regarding seniority lists issued from his appointment till 2019 wherein he has been placed junior to respondent No 6 but never objected the same. Even all the seniority lists have been prepared as per Section 8 of Civil Servants Act, 1973 and Rule 17 of Appointment, Promotion and Transfer Rules 1989. In previous Appeal, the appellant only challenged the Seniority of Sana Zeb patwari only.

- VII. Para under reply pertains to record however such order do not give any right in favor of appellant and even after reversion the appellant never challenged the same.
- VIII. Para under reply pertains to record and detailed reply has been given in preceding para. **(Copies of Seniority Lists & Appointment order are enclosed as Annexure A & A/1).**
2. Para No 2 relates to official respondents with explanation that after serving for more than fourteen years, the appellant cannot turn around, as he accepted the same and never objected the same, was even placed junior to respondent No 6, now at this belated stage how he can raise such plea being estopped by his conduct from doing so. **(Copy of Patwar Appointment Rules 1963, Land Record Manual & Notification dated 27-11-2001 is enclosed as Annexure B, C & D).**
 3. Para under reply not relevant to answering respondent; however the same condition has been deleted in 2020.
 4. Para 4 of the appeal is incorrect, as the appellant has tried to misinterpret the rules, as according to the same, passing Kanungo examination, doesn't create any right of seniority rather the condition in the relevant rules is having three years' service as patwari, while respondent No 6 is having more than the required service length and since appointment is placed senior to the appellant. There is no condition in the said rules that a patwari must have three years' service after he has passed his Kanungo exam.
 5. Para 5 incorrect, as the respondent No 6 being senior to the appellant has been promoted according to the universal principle of promotion of seniority cum fitness, thus respondent No 6 has never been granted out of turn promotion.
 6. Para 6 of the appeal pertains to record however departmental appeal of the appellant being unfounded has rightly been rejected.
 7. Para No 7 of the appeal needs no comments.


REPLY TO GROUNDS:

- A. Incorrect, as the appellant has been treated in accordance with law and no rights of the appellant have been violated.
- B. Incorrect, as the impugned orders are according to law, facts and record.

- I. Incorrect, as the promotion order has been issued according to the principle of seniority cum fitness.
 - II. Not relevant to answering respondent.
 - III. Incorrect and as stated above, the appellant is misinterpreting the law.
 - IV. Incorrect, the answering respondent has been appointed prior to the appellant and has been placed senior to him since the date of appointment which has never objected, further the seniority is governed under Section 8 of Civil Servants Act, 1973 and Rule 17 of Appointment, Promotion and Transfer Rules 1989, thus the appellant has got no cause of action even to claim seniority.
 - V. Incorrect as stated above the appellant is misinterpreting the law and rules on the subject.
 - VI. Incorrect as working against a post on temporary basis does not create any right of seniority, the details tabled are irrelevant.
- C. Incorrect the answering respondent is much senior to the appellant, thus he has rightly been promoted.
- D. Incorrect detailed reply has been given in preceding para and the appellant being junior to the answering respondent has rightly been ignored from promotion thus the impugned order is according to law.

It is therefore prayed that appeal of the appellant may kindly be dismissed with heavy costs.

Dated:- _____


Respondent No 6

Through


FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

AFFIDAVIT

I, Miraj Khan S/O Abdul Rauf Khan (Kanungo) R/O Dhoda, Banda Mausam Khan, Tehsil & District Kohat, (Respondent No 6), do hereby solemnly affirm and declare on oath that the contents of accompanying **Reply** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.


DEPONENT

-4-

01 "A"

FINAL SENIORITY LIST OF PATWARIS DISTRICT KOHAT FOR THE
YEAR 31-12-2012.

No.	Name & Parentage	Qualification	Date of Birth	Date of Appointment	Remarks
1.	Muhammad Arif s/o Hamz Ullah	Matric	3/5/1954	4/4/1973	
2.	Abdul Razzag s/o Muhammad Ramazan	Matric	29/5/1955	9/1/1975	
3.	Phool Badshah s/o Khan Badshah	Middle	9/4/1958	16/1/1981	
4.	Sarfraz Khan s/o Ameer Khan	Matric	25/12/1959	28/4/1981	
5.	S. Mujahid Shah s/o S. Charagh Shah	Matric	22/4/1954	5/12/1982	
6.	Nisrab Shah s/o Khan Badshah	Matric	01/10/1957	01/10/1984	
7.	Safdar Rehman s/o Abdullah Khan	Matric	1/9/1963	1/4/1985	
8.	Abdullah Jan s/o Suliman Khan	F.A	1/12/1968	1/12/1988	
9.	Hafeez Ullah s/o Maher Dil	Matric	28/3/1967	23/10/1991	
10.	Abdul Rauf Khan s/o Atta Khan	Matric	1/1/1960	9/12/1993	
11.	Shah Iran s/o Ghulam Rasool	Matric	2/2/1964	14/01/1996	
12.	Abid Iqbal s/o Muhammad Sharif	B.A	29/9/1967	15/3/2000	
13.	Abdul Shakoor s/o Muhammad Akbar	F.A	9/11/1969	15/3/2000	
14.	Hameed Khan s/o Ameer Khan	F.A	6/9/1971	15/3/2000	
15.	Daud Khan	B.A	15/06/1970	09/06/2001	
16.	Magsad Ali s/o Wahab Ali	F.A	30/3/1976	25/6/2002	
17.	Syed Gul Shah s/o Habib Shah	F.A	6/8/1974	25/6/2002	
18.	Samir Ullah s/o Asad Khan	B.A	11/2/1975	25/6/2002	Dead
19.	Muhammad Zubair s/o Muhammad Amin	F.A	1/5/1975	25/6/2002	
20.	Faheem Shah s/o Inam Shah	B.A	15/2/1976	25/6/2002	
21.	Musharaf Masood s/o Magbool Ahmad	F.A	05/03/1974	25/06/2002	
22.	Amir Naveed Hussain s/o S. Qarnain Hussain	M.A	10/8/1977	25/6/2002	
23.	Jahanzib Khan s/o Dauran Khan	F.A	15/2/1973	25/2/2002	
24.	Azmat Ullah Khan s/o Hidayat Ullah	F.A	19/11/1973	30/4/2003	
25.	Zafar Iqbal s/o Iqbal Khan	F.A	18/5/1971	25/10/2004	
26.	Inam Ul Haq s/o Abdul Haq	M.A	6/7/1969	11/1/2005	
27.	S. Pervaiz Hussain s/o S. Sahib Shah	F.A	23/3/1975	10/3/2006	
28.	Miraj Khan s/o Abdul Rauf Khan	F.A	15/3/1977	8/5/2006	
29.	Muhammad Qasim s/o Abdul Azeez	F.A	4/3/1982	8/5/2006	
30.	Sanazeb s/o Aurang Zeb	F.A	23/3/1983	8/5/2006	
31.	Kashif Jamal s/o Muhammad Mumtaz	B.A	15/3/1975	11/7/2006	
32.	Aslam Yar s/o Muhammad Ashfaq	F.A	9/3/1980	7/9/2006	
33.	Fareed Gul s/o Wazir Gul	F.A	15/12/1982	14/5/2007	
34.	Anwar Javid s/o Zureef Khan	F.A, D.Com	15/1/1984	14/5/2007	
35.	Umar Farooq s/o Afzal Khan	F.A	30/4/1981	14/5/2007	
36.	Muhammad Asif	F.A	28/3/1979	9/10/2007	
37.	Shahzad Khan s/o Abdul Khaliq	F.A	28/8/1983	11/3/2008	
38.	Abdullah s/o Gul Zaman	F.A	10/6/1985	9/4/2008	
39.	Mehran Gul s/o Hamish Gul	F.A	20/12/1985	9/4/2008	

-5-

40.	Eariq Hussain s/o Musir Khan	F.A	1/3/1982	9/1/2009
41.	Faisal Shalrizad s/o Muhammad Sadiq	F.A	5/4/1983	9/1/2009
42.	Abdul Waheed s/o Abdul Subhan	F.A	6/11/1980	10/9/2009
43.	Faraz Khan s/o Fareed Khan	F.A	6/4/1983	10/10/2009
44.	Amir Ahsan s/o Nawab Gul	B.A	1/3/1989	10/10/2009
45.	Nadir Khan s/o Nascem Gul	F.A	28/6/1990	19/12/2011
46.	Muhammad Waqar s/o Muhammad Nasir	F.A	15/6/1986	19/12/2011
47.	Irfan Khan s/o Suléman Khan	F.A	22/3/1984	19/12/2011
48.	Ahsan Mehmood s/o Abdul Mehmood	F.A	26/4/1989	19/12/2011
49.	Malik Shahreyar s/o Malik Saïd Ullah Khan	F.A	15/11/1982	19/12/2011
50.	Hashim Basher s/o Basher Ahmad	F.A	15/8/1987	19/12/2011
51.	Muhammad Shahid s/o Abdul Sitar	F.A	6/2/1984	19/12/2011
52.	Asif Shahzad s/o Muhammad Aman	F.A.C	15/3/1984	19/12/2011
53.	Muhammad Aqib Faiz s/o Faiz Muhammad	F.A	7/6/1989	19/12/2011
54.	Kamran Khan s/o Shafiq Khan	F.A	24/2/1986	19/12/2011
55.	Syed Arsham Ullah Khan s/o S. Mujahid Shah	B.A	9/9/1982	19/12/2011
56.	Imtiaz Ahmad s/o Akram Khan	F.A	22/3/1984	19/12/2011
57.	Muhammad Sajid s/o Ayub Khan	B.A	24/9/1982	19/12/2011
58.	Danish Rehman s/o Hafeez-Ur-Rehman	F.A	1-01-1988	28-06-2012

Deputy Commissioner,
Kohat

SENIORITY LIST OF PATWARIS OF DISTRICT KOHAT FOR THE END OF YEAR 31-12-2014

Taqd Saifianah = 3

No.	Name & Parentage	Qualification	Date of Birth	Date of Appointment	Exam Status	Remarks
1	Abdul Razaq s/o Muhammad Ramazan	Matric	29/5/1955	9/1/1975	kanungo Exam Not Passed	
2	Phool Badshah s/o Khan Badshah	Middle	9/4/1958	16/1/1981	kanungo Exam Not Passed	Rehm
3	Sarfraz Khan s/o Ameer Khan	Matric	25/12/1959	28/4/1981	kanungo Exam Not Passed	Wahid
4	Nisrab Shah s/o Khan Badshah	Matric	1/10/1957	1/10/1984	kanungo Exam Not Passed	malg
5	Safdar Rehman s/o Abdullah Khan	Matric	1/9/1963	1/4/1985	kanungo Exam Not Passed	Wahid
6	Abdullah Jan s/o Suliman Khan	F.A	1/12/1968	1/12/1988	kanungo Exam Not Passed	Leno
7	Hafeez Ullah s/o Maher Dil	Matric	28/3/1967	23/10/1991	kanungo Exam Not Passed	Shah No.
8	Abdul Rauf Khan s/o Atta Khan	Matric	1/1/1960	9/12/1993	kanungo Exam Not Passed	Lach
9	Shah Iran s/o Ghulam Rasool	Matric	2/2/1964	14/01/1996	kanungo Exam Not Passed	S/one
10	Abdul Shakoer s/o Muhammad Akbar	F.A	9/11/1969	15/3/2000	kanungo Exam Passed	Pranvi
11	Fameed Khan s/o Ameer Khan	F.A	6/9/1971	15/3/2000	kanungo Exam Not Passed	Wahid
12	Muhammad Zubair s/o Muhammad Amin	F.A	1/5/1975	25/6/2002	kanungo Exam Not Passed	Wahid
13	Muhammad Shah s/o Inam Shah	B.A	15/2/1976	25/6/2002	kanungo Exam Passed	Wahid
14	Musharraf Masood s/o Maqbool Ahmad	F.A	5/3/1974	25/06/2002	kanungo Exam Passed	Wahid
15	Amir Naveed Hussain s/o S. Qarnain Hussain	M.A	10/8/1977	25/6/2004	kanungo Exam Passed	ATRA
16	Jahanzib Khan s/o Duran Khan	F.A	15/2/1973	25/2/2002	kanungo Exam Passed	Shahid
17	Zinat Ullah Khan s/o Hidayat Ullah	F.A	19/11/1973	30/4/2003	kanungo Exam Passed	Wahid
18	Zafar Iqbal s/o Iqbal Khan	F.A	18/5/1971	25/10/2004	kanungo Exam Passed	Wahid
19	Inam Ul Haq s/o Abdul Haq	M.A	6/7/1969	11/1/2005	kanungo Exam Passed	Wahid
20	S. Perwaiz Hussain s/o S. Sahib Shah	F.A	23/3/1975	10/3/2006	kanungo Exam Passed	Wahid

15-2-1992 ✓

DOB 22-4-1961 ✓

TRA =

کمان شوریسی (FA) ✓

DOB Kohat = 15-7-1990 - 1995 -

Halgas = 10
AOK = 1
TRA = 1
ATRA = 1

D. of ATRA = 4-10-1986
Wahid = 15 7 100

21	Kiraj Khan s/o Abdul Rauf Khan	F.A	15/3/1977	8/5/2006	ضمانت
22	Muhammad Qasim s/o Abdul Azeem	F.A	4/3/1982	8/5/2006	حما
23	Banazeb s/o Aurang Zeb	F.A	23/3/1983	8/5/2006	اسپرزی
24	Kashif Jamil s/o Muhammad Mumtaz	B.A	15/3/1975	11/7/2006	ضمانت
25	Ashraf Yar s/o Muhammad Ashraf	F.A	3/3/1980	7/9/2006	ضمانت
26	Fareed Gul s/o Anzir Gul	F.A	15/12/1982	14/5/2007	ضمانت
27	Anwar Javid s/o Zureef Khan	F.A, D.Com	15/4/1984	14/5/2007	ضمانت
28	Umar Farooq s/o Afzal Khan	F.A	30/4/1981	14/5/2007	ضمانت
29	Muhammad Asif	F.A	28/3/1979	9/10/2007	ضمانت
30	Shahzad Khan s/o Abdul Khalig	F.A	28/8/1983	11/3/2008	ضمانت
31	Abulhasan s/o Gul Zaman	F.A	10/6/1985	9/4/2008	ضمانت
32	Mehran Gul s/o Hamish Gul	F.A	20/12/1985	9/4/2008	ضمانت
33	Fariq Hussain s/o Musa Khan	F.A	1/3/1982	9/1/2009	ضمانت
34	Faisal Shahzad s/o Muhammad Sadiq	F.A	15/4/1983	9/1/2009	ضمانت
35	Paraz Khan s/o Fareed Khan	F.A	16/4/1983	10/10/2009	ضمانت
36	Amir Ahsan s/o Nawab Gul	B.A	1/3/1989	10/10/2009	ضمانت
37	Nadir Khan s/o Naseem Gul	F.A	28/6/1990	19/12/2011	ضمانت
38	Muhammad Waqar s/o Muhammad Nasir	F.A	15/6/1986	19/12/2011	ضمانت
39	Ifan Khan s/o Suleman Khan	F.A	22/3/1984	19/12/2011	ضمانت

40	Ahsan Mehmood s/o Abdul Mehmood	F.A	26/4/1989	19/12/2011	محمد علی
41	Malik Shihreyur s/o Malik Saif Ullah Khan	F.A	15/11/1982	19/12/2011	محمد علی
42	Husnim Dasher s/o Dasher Ahmad	F.A	15/8/1987	19/12/2011	
43	Muhammad Shahid s/o Abdul Sitar	F.A	6/2/1984	19/12/2011	محمد علی
44	Asif Shahzad s/o Muhammad Aman	F.S.C	15/3/1984	19/12/2011	محمد علی
45	Muhammad Aqib Faiz s/o Faiz Muhammad	F.A	7/6/1989	19/12/2011	AOK - Kohat
46	Kamran Khan s/o Shafiq Khan	F.A	24/2/1986	19/12/2011	محمد علی
47	Syed Arsham Ullah Khan s/o S. Mujahid Shah	B.A	9/9/1982	19/12/2011	محمد علی
48	Imtiaz Ahmad s/o Akram Khan	F.A	22/3/1984	19/12/2011	
49	Muhammad Sajid s/o Ayub Khan	B.A	24/9/1982	19/12/2011	محمد علی
50	Danish Rehman s/o Hafeez Ur Rehman	F.A	1/1/1988	28-06-2012	
51	Amir Naseer s/o Naseer Khan	F.A	10/2/1983	12/2/2014	محمد علی
52	Malik Kashif Masood s/o Malik Abdul Rehman	F.A	13/4/1984	12/2/2014	محمد علی
53	Ashraf Khan s/o Musaddiq Khan	F.A	2/4/1986	12/2/2014	محمد علی
54	Mohsin Iqbal s/o Azhar Iqbal	F.A	15/4/1989	12/2/2014	محمد علی
55	Arar Khan s/o Baseer Khan	F.A	3/3/1989	30/6/2014	محمد علی
56	Syed Faisal Shah s/o Syed Qaiser Shah	F.A	25/5/1987	30/6/2014	محمد علی
57	Mehtab Ali s/o Ansaar Ali	F.A	25/5/1987	30/6/2014	محمد علی

Superintendent
By: Commissioner
Kohat

Deputy Commissioner
Kohat

58. Mushraf - DOB

18-2-2015

59. Binhan Sohail

4-11-1991

ATRA - Kohat

**MINI-SENIORITY LIST OF PATWARIS PERTAINING TO DISTRICT KOHAT
AS STOOD ON 12/2/2018**

Sanctioned Posts
Patwarl (BPS-09) =56
TRA (BPS-07) =01
ATRA (BPS-06) =02
AOK (BPS-05) =02

9-

S.No	Name & Presently	Qualification	Date of Birth	Date of Appointment	Kanungo Exam Passed/Not Passed	Remarks
1	Phool Badshah s/o Khan Badshah	Middle	9/4/1958	16/1/1981	kanungo Exam Not Passed	
2	Sarfaraz Khan s/o Ameer Khan	Matric	25/12/1959	28/4/1981	kanungo Exam Not Passed	
3	Nisrab Shah s/o Khan Badshah	Matric	1/10/1957	1/10/1984	kanungo Exam Not Passed	
4	Safdar Rehman s/o Abdullah Khan	Matric	1/9/1963	1/4/1985	kanungo Exam Not Passed	
5	Abdullah Jan s/o Suliman Khan	F.A	1/12/1968	1/12/1988	kanungo Exam Not Passed	
6	Hafeez Ullah s/o Maher Dil	Matric	28/3/1967	23/10/1991	kanungo Exam Not Passed	
7	Burhan Sohail	Matric	16/6/1967	4/11/1991	kanungo Exam Not Passed	ATRA Kohat
8	Kinan Ghafoor	Matric	22-4-1961	15-2-1992	kanungo Exam Not Passed	TRA Lachi
9	Abdul Rauf Khan s/o Alta Khan	Matric	1/1/1960	9/12/1993	kanungo Exam Not Passed	
10	Abdul Shakoor s/o Muhammad Akbar	F.A	9/11/1969	15/3/2000	kanungo Exam Not Passed	
11	Hameed Khan s/o Ameer Khan	F.A	6/9/1971	15/3/2000	kanungo Exam Not Passed	
12	Muhammad Zubair s/o Muhammad Amin	F.A	1/5/1975	25/6/2002	kanungo Exam Passed	
13	Fahem Shah s/o Inam Shah	B.A	15/2/1976	25/6/2002	kanungo Exam Passed	
14	Amir Navced Hussain s/o S. Qarnain Hussain	M.A	10/8/1977	25/6/2002	kanungo Exam Passed	
15	Musharaf Masood s/o Maqbool Ahmad	F.A	5/3/1974	25/06/2002	kanungo Exam not Passed	ATRA Lachi
16	Jehanzib Khan s/o Dauran Khan	F.A	15/2/1973	25/6/2002		
17	Azmat Ullah Khan s/o Hidayat Ullah	F.A	19/11/1973	30/4/2003		
18	Zafar Iqbal s/o Iqbal Khan	F.A	18/5/1971	25/10/2004		
19	Inam Ul Haq s/o Abdul Haq	M.A	6/7/1969	11/1/2005		
20	S. Pervaiz Hussain s/o S. Sahib Shah	F.A	23/3/1975	10/3/2006		
21	Miraj Khan s/o Abdul Rauf Khan	F.A	15/3/1977	8/5/2006		
22	Muhammad Qasim s/o Abdul Azem	F.A	4/3/1982	8/5/2006		
23	Sana Zeb s/o Aurang Zeb	F.A	23/3/1983	8/5/2006		
24	Kashif Jamal s/o Muhammad Akhtar	B.A	15/3/1975	11/7/2006		
25	Asfand Yar s/o Muhammad Ashfaq	F.A	9/3/1980	7/9/2006		
26	Anwar Javid s/o Zareef Khan	F.A, D:Com	15/4/1984	14/5/2007		
27	Fareed Gul s/o Wazir Gul	F.A	15/12/1982	14/5/2007		
28	Umar Farooq s/o Afzal Khan	F.A	30/4/1981	14/5/2007		
29	Muhammad Asif	F.A	28/3/1979	9/10/2007		

31	Abdullah s/o Gul Zaman	F.A	10/6/1985	9/4/2008	
32	Mehran Gul s/o Hamish Gul	F.A	20/12/1985	9/4/2008	
33	Tariq Hussain s/o Musa Khan	F.A	1/3/1982	9/1/2009	
34	Faisal Shahzad s/o Muhammad Sadiq	F.A	15/4/1983	9/1/2009	
35	Faraz Khan s/o Farced Khan	F.A	16/4/1983	10/10/2009	
36	Amir Ahsan s/o Nawab Gul	B.A	1/3/1989	10/10/2009	
37	Nadir Khan s/o Nassem Gul	F.A	28/6/1990	19/12/2011	
38	Muhammad Waqar s/o Muhammad Nasir	F.A	15/6/1986	19/12/2011	
39	Irfan Khan s/o Suleman Khan	F.A	22/3/1984	19/12/2011	AOK LACHI-
40	Ahsan Mehmood s/o Abdul Mehmood	F.A	26/4/1989	19/12/2011	
41	Malik Shahreyar s/o Malik Said Ullah Khan	F.A	15/11/1982	19/12/2011	
42	Hashim Basher s/o Basher Ahmad	F.A	15/8/1987	19/12/2011	
43	Muhammad Shahid s/o Abdul Sitar	F.A	6/2/1984	19/12/2011	
44	Asif Shahzad s/o Muhammad Aman	Fsc	15/3/1984	19/12/2011	AOK Kohat
45	Muhammad Aqib Faiz s/o Faiz Muhammad	F.A	7/6/1989	19/12/2011	
46	Kamran Khan s/o Shaflq Khan	F.A	24/2/1986	19/12/2011	
47	Syed Arshiam Ullah Khan s/o S: Mujahid Shah	B.A	9/9/1982	19/12/2011	
48	Imtiaz Ahmad s/o Akram Khan	F.A	22/3/1984	19/12/2011	
49	Muhammad Sajid s/o Ayub Khan	B.A	24/9/1982	19/12/2011	
50	Danish Rehman s/o Hafcez-Ur-Rehman	F.A	1/1/1988	28-06-2012	
51	Malik Kashif Masood s/o Malik Abdul Rehman	F.A	13/4/1984	12/2/2014	
52	Aamir Naseer s/o Naseer Khan	F.A	10/2/1983	12/2/2014	
53	Ashraf Khan s/o Musaddiq Khan	F.A	2/4/1988	12/2/2014	
54	Mohsin Iqbal s/o Azhar Iqbal	F.A	15/4/1989	12/2/2014	
55	Zulfqar All Shah	FA	5/5/1990	4/4/2014	
56	Israr Khan s/o Baseer Khan	F.A	3/3/1989	30/8/2014	
57	Syed Faisal Shah s/o Syed Qaiser Shah	F.A		30/8/2014	
58	Mehtab Ali s/o Ansaar Ali	F.A	25/5/1987	30/8/2014	
59	Mushraf Hussain	D COM	15-4-1985	18-5-2015	

-10-

Zarfar
Deputy Commissioner
Kohat

SENIORITY LIST OF PATWARIS PERTAINING TO DISTRICT KOHAT
 AS STOOD ON 31-12-2018

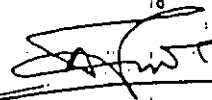
Sanctioned Posts
 Patwar (BPS-09) =56
 TRA (BPS-07) =01
 ATRA (BPS-05) =02
 AOK (BPS-05) =02

-11-

S.No.	Name & Parentage	Qualification	Date of Birth	Date of Appointment	Kanungo Exam Passed/Not Passed	Remarks
1	Phool Badshah s/o Khan Badshah	Middle	9/4/1958	16/1/1981	kanungo Exam Not Passed	
2	Sarfraz Khan s/o Ameer Khan	Matric	25/12/1959	28/4/1981	kanungo Exam Not Passed	
3	Nisrabi Shah s/o Khan Badshah	Matric	1/10/1957	1/10/1984	kanungo Exam Not Passed	
4	Sofdar Rehman s/o Abdullah Khan	Matric	1/9/1963	1/4/1985	kanungo Exam Not Passed	
5	Abdullah Jan s/o Suliman Khan	F.A	1/12/1968	1/12/1988	kanungo Exam Not Passed	
6	Hafeez Ullah s/o Maher Dil	Matric	28/3/1967	23/10/1991	kanungo Exam Not Passed	
7	Hurham Sobail	Matric	16/6/1967	4/11/1991	kanungo Exam Not Passed	ATRA Kohat
8	Kinn Ghafour	Matric	22-4-1961	15-2-1992	kanungo Exam Not Passed	TRA Lachi
9	Abdul Rauf Khan s/o Atta Khan	Matric	1/1/1960	9/12/1993	kanungo Exam Not Passed	
10	Abdul Shakoor s/o Muhammad Akbar	F.A	9/11/1969	15/3/2000	kanungo Exam Not Passed	
11	Hameed Khan s/o Ameer Khan	F.A	6/9/1971	15/3/2000	kanungo Exam Not Passed	
12	Mustharaf Masood s/o Amrbool Ahmad	F.A	5/3/1974	25/06/2002	kanungo Exam not Passed	ATRA Lachi
13	Jahanzeb Khan s/o Dauran Khan	F.A	15/2/1973	25/6/2002		
14	Azmat Ullah Khan s/o Hidayat Ullah	F.A	19/11/1973	30/4/2003		
15	Zafar Iqbal s/o Iqbal Khan	F.A	18/5/1971	25/10/2004		
16	Inam Ul Haq s/o Abdul Haq	M.A	6/7/1969	11/1/2005		
17	S. Pervaiz Hussain s/o S. Sahib Shah	F.A	23/3/1975	10/3/2006		
18	Miraj Khan s/o Abdul Rauf Khan	F.A	15/3/1977	8/5/2006		
19	Muhammad Qasim s/o Abdul Azeem	F.A	4/3/1982	8/5/2006		
20	Saim Zehr s/o Aurang Zeh	F.A	23/3/1983	8/5/2006		
21	Kushif Jamal s/o Muhammad Mumtaz	B.A	15/3/1975	11/7/2006		
22	Asfand Yar s/o Muhammad Ashfaq	F.A	9/1/1980	7/7/2006		
23	Anwar Javid s/o Zareef Khan	F.A, D Com	15/1/1984	14/5/2007		
24	Fareed Gul s/o Wazir Gul	F.A	15/12/1982	14/5/2007		
25	Hina Farooq s/o Afzal Khan	F.A	30/4/1981	14/5/2007		
26	Muhammad Asif	F.A	28/3/1979	9/10/2007		
27	Sitahzad Khan s/o Abdul Khaliq	F.A	28/8/1983	11/3/2008		

29	Adhullah s/o Gul Zaman	F.A	10/6/1985	9/4/2008		
29	Mehran Gul s/o Hamish Gul	F.A	20/12/1985	9/4/2008		
30	Tariq Hussain s/o Musa Khan	F.A	1/3/1982	9/1/2009		
31	Faisal Shahzad s/o Muhammad Sadiq	F.A	15/4/1983	9/1/2009		
32	Faraz Khan s/o Fareed Khan	F.A	16/4/1983	10/10/2009		
33	Amir Ahsan s/o Nawab Gul	B.A	1/3/1989	10/10/2009		
34	Nadir Khan s/o Naseem Gul	F.A	28/6/1990	19/12/2011		
35	Muhammad Waqar s/o Muhammad Nasir	F.A	15/6/1986	19/12/2011		
36	Irfan Khan s/o Sultan Khan	F.A	22/3/1984	19/12/2011		AOK LACHI
37	Ahsan Mehmood s/o Abdul Mehmood	F.A	26/4/1989	19/12/2011		
38	Malik Shahreyar s/o Malik Said Ullah Khan	F.A	15/11/1982	19/12/2011		
39	Hashim Basher s/o Basher Ahmad	F.A	15/8/1987	19/12/2011		
40	Muhammad Shahid s/o Abdul Sitar	F.A	6/2/1984	19/12/2011		
41	Asif Shahzad s/o Muhammad Aman	Bsc	15/3/1984	19/12/2011		AOK Kohat
42	Muhammad Aqib Faiz s/o Faiz Muhammad	F.A	7/6/1989	19/12/2011		
43	Kamran Khan s/o Shafiq Khan	F.A	24/2/1986	19/12/2011		
44	Syed Arsham Ullah Khan s/o S. Mujahid Shah	B.A	9/9/1982	19/12/2011		
45	Mintaz Ahmad s/o Akram Khan	F.A	22/3/1984	19/12/2011		
46	Muhammad Sajid s/o Ayub Khan	B.A	24/9/1982	19/12/2011		
47	Danish Rehman s/o Hafeez Ur Rehman	F.A	1/1/1988	28-06-2012		
48	Malik Kashif Masood s/o Malik Abdul Rehman	F.A	13/4/1984	12/2/2014		
49	Amir Naseer s/o Naseer Khan	F.A	10/2/1983	12/2/2014		
50	Ashraf Khan s/o Musaddiq Khan	F.A	2/4/1986	12/2/2014		
51	Mohsin Iqbal s/o Azhar Iqbal	F.A	15/4/1989	12/2/2014		
52	Zulfqar Ali Shah	F.A	5/5/1990	4/4/2014		
53	Israr Khan s/o Baseer Khan	F.A	3/3/1980	30/8/2014		
54	Syed Faisal Shah s/o Syed Qaiser Shah	F.A		30/8/2014		
55	Mehrab Ali s/o Ansaar Ali	F.A	25/5/1987	30/8/2014		
56	Muhsin Husain	D.COM	15-4-1985	18-5-2015		

- 2 -


Additional Deputy Commissioner
kohat

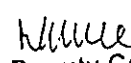
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TENTATIVE SENIOR LIST OF PATWARIS PERTAINING TO DISTRICT KOHAT
AS STOOD ON 31/12/2017

Sanctioned Posts
Patwari (BPS-09) = 58

No.	Name & Parentage	Qualification	Date of Birth	Date of Appointment	Kanungo Exam Passed/Not Passed	Remarks
1	Phool Badshah s/o Khan Badshah	Middle	9/4/1958	16/1/1981	kanungo Exam Not Passed	
2	Sarfraz Khan s/o Amcer Khan	Matric	25/12/1959	28/4/1981	kanungo Exam Not Passed	
3	Nisrab Shah s/o Khan Badshah	Matric	14/4/1960	8/5/1983	kanungo Exam Not Passed	
4	Sulair Rehman s/o Abdullah Khan	Matric	1/9/1963	1/4/1985	kanungo Exam Not Passed	
5	Abdullah Jan s/o Suliman Khan	F.A	1/12/1968	1/12/1988	kanungo Exam Not Passed	
6	Hafeez Ullah s/o Maher Dil	Matric	28/3/1967	23/10/1991	kanungo Exam Not Passed	
7	Durhan Sohail	Matric	16/6/1967	4/1/1991	kanungo Exam Not Passed	ATRA Kohat
8	Abdul Rauf Khan s/o Atta Khan	Matric	1/1/1960	9/12/1993	kanungo Exam Not Passed	
9	Abdul Shakoor s/o Muhammad Akbar	F.A	9/11/1969	15/3/2000	kanungo Exam Not Passed	
10	Hameed Khan s/o Amcer Khan	F.A	6/9/1971	15/3/2000	kanungo Exam Not Passed	
11	Musharaf Masood s/o Maqbool Ahmad	F.A	5/3/1974	25/06/2002	kanungo Exam not Passed	ATRA Lachi
12	Dalnazib Khan s/o Dauran Khan	F.A	15/2/1973	25/6/2002		
13	Armat Ullah Khan s/o Hidayat Ullah	F.A	19/11/1973	30/4/2003		
14	Zafar Iqbal s/o Iqbal Khan	F.A	18/5/1971	25/10/2004		
15	Inam ul Haq s/o Abdul Haq	M.A.	6/7/1969	11/1/2005		
16	S. Pervaiz Hussain s/o S. Sahib Shah	F.A	23/3/1975	10/3/2006		
17	Miraj Khan s/o Abdul Rauf Khan	F.A	15/3/1977	8/5/2006		
18	Muhammad Qasim s/o Abdul Azeem	F.A	4/3/1982	8/5/2006		
19	Sana Zeb s/o Aurang Zeb	F.A	23/3/1983	8/5/2006		
20	Kashif Jamal s/o Muhammad Mumtaz	B.A	15/3/1975	11/7/2006		
21	Asfand Yar s/o Muhammad Ashfaq	F.A	9/3/1980	7/9/2006		
22	Anwar Javid s/o Zareef Khan	F.A, D.Com	15/4/1984	14/5/2007		
23	Fareed Gul s/o Wazir Gul	F.A	15/12/1982	14/5/2007		
24	Umar Farooq s/o Afzal Khan	F.A	30/4/1981	14/5/2007		
25	Muhammad Asif	F.A	28/3/1979	9/10/2007		
26	Shahzad Khan s/o Abdul Khaliq	F.A	28/8/1983	11/3/2008		

27	Abdullah s/o Gul Zaman	F.A	10/6/1985	9/4/2008	
28	Mehran Gul s/o Hamish Gul	F.A	20/12/1985	9/4/2008	
29	Tariq Hussain s/o Musa Khan	F.A	1/3/1982	9/1/2009	
30	Faisal Shahzad s/o Muhammad Sadiq	F.A	15/4/1983	9/1/2009	
31	Farooz Khan s/o Farooz Khan	F.A	16/4/1983	10/10/2009	
32	Amir Ahsan s/o Nawab Gul	B.A	1/3/1989	10/10/2009	
33	Nadir Khan s/o Naseem Gul	F.A	28/6/1990	19/12/2011	
34	Muhammad Waqar s/o Muhammad Nasir	F.A	15/6/1986	19/12/2011	AOK LACHI
35	Irfan Khan s/o Suleman Khan	F.A	22/3/1984	19/12/2011	
36	Ahsan Mahmood s/o Abdul Mahmood	F.A	26/4/1989	19/12/2011	
37	Malik Shahreyar s/o Malik Sajid Ullah Khan	F.A	15/11/1982	19/12/2011	
38	Husaini Dasher s/o Dasher Ahmad	F.A	15/8/1987	19/12/2011	
39	Muhammad Shahid s/o Abdul Sitar	F.A	6/2/1984	19/12/2011	AOK Kohat
40	Asif Shahzad s/o Muhammad Aman	Fsc	15/3/1984	19/12/2011	
41	Muhammad Aqib Faiz s/o Faiz Muhammad	F.A	7/6/1989	19/12/2011	
42	Kamran Khan s/o Shafiq Khan	F.A	24/2/1986	19/12/2011	
43	Syed Arsham Ullah Khan s/o Syed Mujahid Shah	B.A	9/9/1982	19/12/2011	
44	Imtiaz Ahmad s/o Akram Khan	F.A	22/3/1984	19/12/2011	
45	Muhammad Sajid s/o Ayub Khan	B.A	24/9/1982	19/12/2011	
46	Danish Rehman s/o Inceez Ur Rehman	F.A	1/1/1988	28-06-2012	
47	Malik Kashif Masood s/o Malik Abdul Rehman	F.A	13/4/1984	12/2/2014	
48	Aamir Naseer s/o Naseer Khan	F.A	10/2/1983	12/2/2014	
49	Ashraf Khan s/o Musaddiq Khan	F.A	2/4/1988	12/2/2014	
50	Mohsin Iqbal s/o Azhar Iqbal	F.A	15/4/1989	12/2/2014	
51	Zulfiqar Ali Shah	FA	5/5/1990	4/4/2014	
52	Israr Khan s/o Baseer Khan	F.A	3/3/1989	30/6/2014	
53	Syed Faisal Shah s/o Syed Qaiser Shah	F.A	17/1/1990	30/6/2014	
54	Mehtab Ali s/o Ansaar Ali	F.A	25/5/1987	30/6/2014	
55	Mushraf Hussain	D-COM	15-4-1985	18-5-2015	
56	Adnan Khan s/o Noor Muhammad	B.A	1/3/1989	13/4/2017	


 Additional Deputy Commissioner
 Kohat
 19/12

TENTATIVE SENIORITY LIST OF PATWARIS PERTAINING TO DISTRICT KOHAT						
AS STOOD ON 30-09-2019						
Sanctioned Posts						
Patwar (BPS-09) = 68						
No.	Name & Parentage	Qualification	Date of Birth	Date of Appointment	Result of Last Written Exam	Remarks
1	Sarfraz Khan s/o Ameer Khan	Matric	25/12/1959	28/4/1981	Not Passed	
2	Nisrah Shah s/o Khun Badshah	Matric	14/4/1960	8/5/1983	Not Passed	
3	Safdar Rehman s/o Abdullah Khan	Matric	17/1/1963	14/1/1985	Passed	
4	Abdullah Jan s/o Suliman Khan	F.A	1/12/1968	1/12/1988	Not Passed	
5	Hafeez Ullah s/o Maher Ullah	Matric	28/3/1967	23/10/1991	Not Passed	
6	Burhan Sohail	Matric	16/6/1967	4/1/1991	Not Passed	
7	Abdul Rauf Khan s/o Alta Khan	Matric	1/1/1960	9/12/1993	Not Passed	
8	Abdul Shakoor s/o Muhammad Akbar	F.A	9/1/1969	13/12/2000	Not Passed	
9	Hameed Khan s/o Ameer Khan	F.A	6/9/1971	15/3/2000	Not Passed	
10	Musharaf, Masood s/o Najibullah Akbar	F.A	5/3/1974	25/06/2002	Passed	
11	Azmat Ullah Khan s/o Hidayat Ullah	F.A	19/11/1973	30/4/2003	Passed	
12	Zafar Iqbal s/o Iqbal Khan	F.A	18/5/1971	25/10/2004	Not Passed	
13	Inam Ul Haq s/o Abdul Haq	M.A	6/7/1969	11/1/2005	Passed	
14	Sajid Pervez Hussain s/o Sajid Shah	F.A	23/3/1975	10/3/2006	Not Passed	
15	Miraj Khan s/o Abdul Rauf Khan	F.A	15/3/1977	8/5/2006	Passed	
16	Muhammad Qasim s/o Abdul Azeem	F.A	4/3/1982	8/5/2006	Passed	
17	Nana Zoh s/o Amang Zoh	F.A	2/11/1981	8/5/2006	Passed	
18	Kashif Jamal s/o Muhammad Mumtaz	B.A	15/3/1975	11/7/2006	Passed	
19	Azfar Yar s/o Muhammad Ashfaq	F.A	9/3/1980	7/1/2006	Passed	
20	Anwar Javid s/o Zareef Khan	F.A, D.Com	15/4/1984	14/5/2007	Passed	
21	Fareed Gul s/o Wazir Gul	F.A	15/12/1982	14/5/2007	Passed	
22	Umar Farooq s/o Afzal Khan	F.A	30/4/1981	14/5/2007	Passed	
23	Muhammad Asif	F.A	28/3/1979	9/10/2007	Passed	
24	Shahzad Khan s/o Abdul Khaliq	F.A	28/8/1983	11/3/2008	Not Passed	
25	Abdullah s/o Gul Zaman	F.A	10/6/1985	9/4/2008	Not Passed	
26	Mehran Gul s/o Hameed Gul	F.A	20/12/1985	9/4/2008	Passed	
27	Tariq Hussain s/o Musa Khan	F.A	1/3/1982	9/1/2009	Passed	
28	Faisal Shahzad s/o Muhammad Sadiq	F.A	15/4/1983	9/1/2009	Passed	
29	Fareed Khan s/o Fareed Khan	F.A	16/4/1983	10/10/2009	Passed	
30	Amir Ahsan s/o Nawab Gul	B.A	1/3/1989	10/10/2009	Passed	

TENTATIVE SENIORITY LIST OF PATWARIS PERTAINING TO DISTRICT KOHAT
 AS STOOD ON 30-09-2019

Sanctioned Posts
 Patwar (BPS-09) -58

-16-

Sl. No.	Name & Parvaize	Qualification	Date of Birth	Date of Appointment	Result of Kanungo Exam Passed/Not Passed	Remarks
31	Nadir Khan s/o Naseem Gul	F.A	28/6/1990	19/12/2011	Passed	
32	Muhammad Waqar s/o Muhammad Nasir	F.A	15/6/1986	19/12/2011	Passed	
33	Hafiz Khan s/o Sulaiman Khan	F.A	23/3/1984	19/12/2011	Passed	
34	Ahsan Mehmood s/o Abdul Mehmood	F.A	26/4/1989	19/12/2011	Not Passed	
35	Malik Shauqiyar s/o Malik Said Ullah Khan	F.A	15/11/1982	19/12/2011	Passed	
36	Hafiz Hasher s/o Hasher Ahmad	F.A	15/8/1987	19/12/2011	Passed	
37	Muhammad Shahid s/o Abdul Nisar	F.A	6/2/1984	19/12/2011	Passed	
38	Aarif Shahid s/o Muhammad Aman	F.A	13/3/1984	19/12/2011	Passed	
39	Muhammad Aqib Faiz s/o Faiz Muhammad	F.A	7/6/1989	19/12/2011	Not Passed	
40	Kamran Khan s/o Shafiq Khan	F.A	24/2/1986	19/12/2011	Not Passed	
41	Syed Arsham Ullah Khan s/o S. Muhammad Shah	B.A	9/9/1982	19/12/2011	Passed	
42	Intiaz Ahmad s/o Akram Khan	F.A	22/3/1984	19/12/2011	Passed	
43	Muhammad Sajid s/o Ayub Khan	B.A	24/9/1982	19/12/2011	Passed	
44	Danish Rehman s/o Hafeez Ur-Rehman	F.A	1/1/1988	28-06-2012	Passed	
45	Malik Kashif Masood s/o Malik Abdul-Rehman	F.A	13/4/1984	12/2/2014	Passed	
46	Aamir Naseer s/o Naseer Khan	F.A	10/2/1983	12/2/2014	Not Passed	
47	Ashraf Khan s/o Musaddiq Khan	F.A	2/4/1986	12/2/2014	Not Passed	
48	Mohsin Iqbal s/o Azhar Iqbal	F.A	15/4/1980	12/2/2014	Not Passed	
49	Zulfiqar Ali Shah	F.A	5/5/1990	4/4/2014	Passed	
50	Israr Khan s/o Baseer Khan	F.A	3/3/1989	30/6/2014	Not Passed	
51	Syed Faisal Shah s/o Syed Qaiser Shah	F.A	17/1/1990	30/6/2014	Passed	
52	Mehtab Ali s/o Ansaar Ali	F.A	25/5/1987	30/6/2014	Not Passed	
53	Syed Musharraf Hussain Shah s/o Syed Ghulam Shah	D COM	15-4-1985	18-5-2015	Passed	
54	Adnan Khan s/o Noor Muhammad	B.A	1/3/1989	13/4/2017	Passed	
55	Syed Muneeb Shah s/o Syed Habib Ullah Shah	B.A	20/04/1986	15/05/2019	Not Passed	
56	Laiq Hussain s/o Wahab Ali	F.A	20/4/1987	15/05/2019	Not Passed	

*NO 3525/DC/ESTB
 dated 6-12-2019*

[Signature]
 Deputy Commissioner
 Kohat

"A"
-17-

O R D E R

On the recommendation of Departmental Selection Committee the following patwar candidates are hereby selected/appointed as patwar :-

1. Mr. Mirsaj Khan s/o Abdul Rauf r/o Banda Moosa Khan Doda, Tehsil District, Kohat.
2. Mr. Muhammed Qasim s/o Abdul Azeem r/o Jangle Khei, Tehsil District, Kohat.
3. Mr. Janna Sab s/o Kurang Sab r/o Sector No. 5, KDA, Kohat.

TERMS AND CONDITION.

- 1) They will produce age & health Certificate from Medical Superintendent Divisional Head Quarter, Hospital, Kohat.
- 2) Their appointment will be on temporary basis and will be terminated without any notice.
- 3) Their period of probation will be 2-years from the actual taken over charge of the post.

District Officer,
Revenue & Estate, Kohat.

No. 871-87 /2024/AA. Dated Kohat the 8.5.24

Copy forwarded for information to the:-

1. District Coordination Officer, Kohat.
2. Secretary, Board of Revenue, MTR, Peshawar.
3. Director Land Records, MTR, Peshawar.
4. District Accounts Officer, Kohat.
5. Deputy District Officer (Revenue), Kohat.
6. Deputy District Officer (Judicial), Kohat.
7. Tehsildar, Kohat.
8. Tehsildar, Lechi.

for compliance.

2/11. Officials concerned for information & compliance.


Distt. Officer, Rev. & Estate
Kohat.

WEST PAKISTAN (NORTHERN ZONE) PATWAR SUBORDINATE SERVICE RULES, 1963.

Services and General Administration Department

NOTIFICATION

The 31st January 1963

No. SO XIX-1-55/58. (Part II).—In exercise of the powers conferred on him by clause (2) of Article 178 of the Constitution of the Republic of Pakistan, the Governor of West Pakistan is pleased to make the following rules regarding recruitment to the West Pakistan (Northern Zone) Patwar Subordinate Service and prescribing conditions of service for the persons appointed thereto, namely:—

PART I—GENERAL

1. *Short title and commencement*—(i) These rules may be called the West Pakistan (Northern Zone) Patwar Subordinate Service Rules, 1963.

(ii) They shall come into force at once.

2. *Definitions*—In these rules, unless the context otherwise requires, the following expressions shall have the meanings hereby respectively assigned to them, that is to say:—

- (a) "appointing authority" means the authority specified in rule 4;
- (b) "Collector" means Collector of a district as defined in the Punjab Land Revenue Act, 1857, and includes a Settlement Officer, Colonisation Officer, Political Agent and any other Officer empowered to exercise the powers of a Collector under the said Act;
- (c) "Government" means the Government of West Pakistan;
- (d) "initial recruitment" means appointment made otherwise than by promotion or transfer from another Service/Department/Post;
- (e) "Northern Zone" means the Divisions of Peshawar, Dera Ismail Khan, Rawalpindi, Lahore, Sargodha, Multan, Bahawalpur, Quetta and Kalat and the District of Lashela in Karachi Division;
- (f) "Scheduled Castes" means the castes, races, tribes or parts or groups within castes, races or tribes, declared to be scheduled castes under any law in force in West Pakistan, or so declared by Government for the purposes of these rules;
- (g) "Service" means the West Pakistan (Northern Zone) Patwar Subordinate Service; and
- (h) "Under-Developed Areas" means Quetta and Kalat Divisions, Lashela District in Karachi Division, the Tribal Areas of Dera Ismail Khan and Peshawar Divisions, and such other areas as Government may declare to be under-developed areas for the purposes of these rules.

PART II—RECRUITMENT

3. *Composition of service*—(1) The Service shall consist of district cadres, members of one cadre not being eligible, save as provided in rule 10, for appointment to a post borne on any other cadre of the Service.

(2) Each cadre of the Service shall comprise the posts of Revenue Patwaris and such other posts as may be determined by Government from time to time.

Explanation—For the purposes of this rule, "district cadre" means the total number of sanctioned posts of Patwaris with a common appointing authority.

4. *Appointing authority*—Appointments to the Service shall be made by the Collector concerned.

5. *Method of recruitment*—(1) Recruitment to the Service shall be made by initial recruitment.

(2) Vacancies in the Service shall be reserved for *bona fide* residents of the district in which they occur.

6. *Age*—(a) No person shall be appointed to the Service by initial recruitment who is less than twenty-one years or more than thirty years of age.

1953 "B"
-18- till 2016
Amendments all

Provided that—

(i) for a period of ten years from the coming into force of these rules, the upper age limit in the case of a candidate from the Scheduled Castes or Under-Developed Areas shall be thirty-three years; and

(ii) in the case of a person whose services under Government have been terminated for want of a vacancy, the period of service already rendered by him shall, for the purpose of the upper age limit under this rule, be excluded from his age.

(2) For the purposes of this rule, age shall be reckoned—

- (i) where recruitment is to be made on the basis of a written examination, as on the 1st of January of the year in which the examination is proposed to be held; and
- (ii) in other cases, as on the last date fixed for submission of applications for appointment.

7. Qualifications—(1) No person shall be appointed to the Service unless he is able to read and write Urdu and has passed—

- (i) the vernacular Final Examination or Anglo-Vernacular Middle Examination; and
- (ii) the Patwar Examination from a Patwar School established in accordance with paragraph 3-10 of the Land Records Manual.

(2) No person, not already in Government service, shall be appointed to the Service unless he produces a certificate of character from the principal of character from two other responsible persons, not being his relatives, who are well-acquainted with his character and antecedents.

PART III—CONDITIONS OF SERVICE

8. Probation—(1) A person appointed to the Service against a substantive vacancy shall remain on probation for a period of two years.

Explanation—Officiating service and service spent on deputation to a corresponding or a higher post may be allowed to count towards the period of probation.

(2) If the work or conduct of a member of the Service during the period of probation has been unsatisfactory, the appointing authority may, notwithstanding that the period of probation has not expired, dispense with his services.

(3) On completion of the period of probation of a member of the Service, the appointing authority may, subject to the provisions of sub-rule (4), confirm him in his appointment, or if his work or conduct has, in the opinion of such authority, not been satisfactory—

- (i) dispense with his services; or
- (ii) extend the period of probation by a period not exceeding two years in all, and during or on the expiry of such period pass such orders as it could have passed during or on the expiry of the initial probationary period.

Explanation I—If no orders have been made by the day following the completion of the initial probationary period, the period of probation shall be deemed to have been extended.

Explanation II—If no orders have been made by the day on which the maximum period of probation expires, the probationer shall be deemed to have been confirmed in his appointment from the date on which the period of probation was last extended or may be deemed to have been so extended.

(4) No person shall be confirmed in the Service unless he successfully completes such training and passes such departmental examinations as may be prescribed by Government from time to time.

(5) If a member of the Service fails to complete successfully any training or pass any departmental examination prescribed under sub-rule (4) within such period or in such number of attempts as may be prescribed by Government, the appointing authority may dispense with his services.

*Amended
with
file*

9. *Seniority*—The seniority *inter se* of the members of the Service in the various grades thereof shall be determined in accordance with the order of merit assigned by the appointing authority; provided that persons selected for the Service in an earlier selection shall rank senior to the person selected in a later selection.

Explanation I—If a junior official in a lower grade is promoted to a higher grade temporarily in the public interest, even though continuing later permanently in the higher grade, it would not adversely affect the interest of his seniors in the fixation of his seniority in the higher grade.

Explanation II—If a junior official in a lower grade is promoted to a higher grade by superseding a senior official and subsequently that official is also promoted, the official promoted first shall rank senior to the official promoted subsequently.

Explanation III—A junior official appointed to a higher grade shall be deemed to have superseded a senior official only if both the junior and senior officials were considered for a higher grade and the junior official was appointed in preference to the senior official.

10. *Liability to transfer and serve*—Members of the Service shall be liable to—
(a) transfer anywhere in West Pakistan; and
(b) serve in any department of Government or any local authority or statutory body set up or established by Government.

11. *General Rules*—In all matters not expressly provided for in these rules, members of the Service shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

12. *Relaxation*—Any of these rules may, for reasons to be recorded in writing, be relaxed in individual cases if Government is satisfied that a strict application of the rule would cause undue hardship to the individual concerned;

Provided that wherever such relaxation involves a question on which consultation with the Commission is mandatory the Commission shall be consulted before the relaxation is made.

13. *Delegation*—Government may delegate all or any of its powers under these rules to any officer subordinate to it.

14. *Powers of Governor to safeguard rights of Government Servants*—Whenever in the application of these rules, the terms and conditions of service of any person serving in connection with the affairs of the Province of West Pakistan, as guaranteed by any law for the time being in force, are likely to be adversely affected, the Governor of West Pakistan shall make appropriate orders to safeguard the constitutional and legal rights of such persons.

(As amended by S&OA Department Notification No. 80-XVIII.2.4/64, dated 7.5.1965)

TO BE SUBSTITUTED FOR NOTIFICATION
BEARING THE SAME NUMBER AND DATE.

-21-(1)

GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE
SERVICES & GENERAL ADMINISTRATION DEPARTMENT
(RECRUITATION WING)

NOTIFICATION

Perthamur, dated the 10th September, 1978.

No. SORI(S&GAD)1-22/78. In exercise of the powers conferred by section 26 of the North-West Frontier Province Civil Servants Act, 1973 (N.W.F.P. ACT XVIIII of 1973), the Governor of the North-West Frontier Province is pleased to direct that in the West Pakistan (Northern Zone) Patwar Subordinate Service Rules, 1963, the following further amendment shall be made, namely:

AMENDMENT.

"In Rule 7, for sub rule (1), the following sub-rule shall be substituted, namely:

"(1) Qualification: - No person shall be appointed to the Service unless he has passed

- (i) the P.A. or equivalent examination from a recognized Board;
- (ii) the Patwar examination from a Patwar School established in accordance with paragraph 3.10 of Land Records Manual;

Provided that the provision of clause (i) above shall not be applicable to persons who have passed the Patwar Examination from a Patwar School established in accordance with paragraph 3.10 of Land Records Manual fully or partially, and have been registered as Patwar Candidates by the Competent Authority in the respective district on or before the 30th June, 1970.

CHIEF SECRETARY TO
GOVT. OF NORTH-WEST FRONTIER PROVINCE.

ہندوؤں کے لیے اس کتاب سے درج ذیل فوائد حاصل ہوں گے۔
 ۱۔ اس کتاب سے ہندوؤں کو اپنے مذہب کی حقانیت اور
 ۲۔ اس کتاب سے ہندوؤں کو اپنے مذہب کی حقانیت اور
 ۳۔ اس کتاب سے ہندوؤں کو اپنے مذہب کی حقانیت اور

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 ۳۔ اس کتاب سے ہندوؤں کو اپنے مذہب کی حقانیت اور

موجود ہے یا نہیں (ورٹیکل ٹائٹل کا امتحان) تمام درجوں اور تمام علاقوں کے پٹواری امیدواران کے لئے کم سے کم تعلیمی قابلیت بتا دینی جائیگی کسی ایسے امیدوار کا نام جو کم از کم مجوزہ تعلیمی قابلیت کا حامل نہ ہو کسی حالت میں درج نہیں کیا جائے گا۔
نوٹ ۱۔ ڈائرکٹر کاغذات اراضی حقیقیہ ناگفتہ بہ حالت میں کم سے کم تعلیمی قابلیت سے متعلق قواعد کو کالعدم قرار دینے سے منع ہے۔

ت اگر ان اور مسطور ایسا کر سکتے ہیں۔
ضی یا کاشتکار خاندان
ان کی ایک علیحدہ فہرست

۳۔ افسران بندوبست کی طرف سے منتخب کردہ امیدوار

کسی زیر بندوبست ضلع میں کوئی ایسا امیدوار جس نے بندوبست کے دوران پٹواریوں کے کام میں خاص راجحان کا ذکر کیا ہو اسے افسر بندوبست ضلع میں رہائش پذیر ہونے کی شرائط سے قطع نظر بطور پٹواری امیدوار منتخب کر سکتا ہے بشرطیکہ وہ بصورت دیگر مطلوبہ قابلیت کا حامل ہو۔

ام درج کرانے کے
ن خود اپنی درخواست
ے افسر کو دی جائے گی
جاری کرے گا کوئی

۳۔ ۹۔ رجسٹرڈ کسی امیدوار کا نام خارج کرنے کی وجوہات قبول شدہ کوئی بھی

امیدوار جو قرضہ پر ردیہ دینا ہو یا کوئی ایسا کاروبار کرنا ہو جو اگر وہ پٹواری ہوتا تو ملازمت سے برخاستہ کرانے کی وجہ بنتا۔ اس کا نام رجسٹر سے خارج کیا جا سکتا ہے۔ کلکٹر کو چاہیے کہ وہ کم از کم سال میں ایک بار رجسٹر کی پٹرنال کرے اور ایسے امیدواروں کے نام رجسٹر سے خارج کرے جو (۱) تین سال تک

ہوں۔ کلکٹر ان کو مسترد
ار کھا جائے۔

کے روزمرہ کام سے
کسی قسم کی مستقل ملازمتوں پر ناکرز ہوں (iii) انہیں پیش کردہ قائم مقام تقرریوں پر تعینات ہونے سے قاصر
ز میں یا (iv) بطور پٹواری یا نائب پٹواری کوئی مستقل تقرری حاصل کئے بغیر ۳ سال کی عمر تک پہنچ
ہوں یا (v) قائم مقام آسیوں پر تعیناتی کے دوران نا اہل ثابت ہوتے ہوں۔

ت اراضی کی خاص
زبان کی بنا پر کسی دیگر ملاز

نوٹ ۱۔ ڈائرکٹر کاغذات اراضی حقیقیہ ناگفتہ بہ حالات کی صورت میں عمر کی حد سے متعلق قواعد کو کالعدم قرار دینے سے منع ہے۔

سے اب "انوی سکول سرٹیفکیٹ امتحان" (سرورسز اینڈ جرنل ایڈمنسٹریشن حکومت پنجاب کا پنجاب گورنمنٹ کے
حصہ اول میں شائع شدہ ریگولیشنز برائیس۔ اے۔ آر۔ III-1-44/46 جرنل 15 ملاحظہ کیجئے۔ رسمی قسم کی صورت
10.9.90 16.05.1990-22-1-1990 (G.O. 5095) 15 ملاحظہ کیجئے۔ رسمی قسم کی صورت
سے اب حکومت اس میں رعایت دے سکتی ہے۔ ملازمت پٹواری کے قواعد ۱۹۲۳ء کا نامزد ۱۲ ملاحظہ کیجئے۔

ر کھا جائے کہ آیا کوئی آر

"D"-24-
72

GOVERNMENT OF THE NORTH-WEST FRONTIER
PROVINCE, REVENUE & ESTATE DEPARTMENT.

NOTIFICATION

DATED, PESHAWAR, THE 27th NOVEMBER, 2001

No. 27944 / Ad-I- In pursuance of the provisions contained in Sub-rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, read with the Cabinet Division Notification No. SRO 475(1)/2001, dated the 28th June, 2001, and in supersession of all previous rules issued in this behalf, the Revenue and Estate Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the Method of recruitment, qualifications and other conditions specified in column 3 to 6 of the Appendix to this notification, which shall be applicable to posts borne on the cadre strength of Revenue and Estate Department specified in column 2 of the said Appendix.

90

SECRETARY TO GOVERNMENT
OF THE NORTH-WEST FRONTIER PROVINCE
REVENUE DEPARTMENT

7

-25-

NO. 27946-51 / Ad-I,

Dated: 27-11-2001.

A copy is forwarded for information and necessary action to:-

1. The Secretary's to Govt. of NWFP:-

- (i) E&A Department.
- (ii) Finance Department.
- (iii) Law Parliamentary Affairs Department.

2. The Secretary's NWFP, Public Service Commission.

3. The Registrar, Peshawar High Court, Peshawar.

4. The Accountant General, NWFP Peshawar.

5. The All D.O (R/E)/ Collector, NWFP.

6. The Private Secretary to Minister for Revenue, NWFP.

7. The Controller, Govt. Printing Press, NWFP, Peshawar with the request that the notification may be published in the official gazette and to supply fifty printed copies to the undersigned.

DEPUTY SECRETARY TO GOVT. OF
THE NWFP, REVENUE DEPARTMENT.

26-

SCHEDULE

S.No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Qualification for appointment by promotion.	Age limit for initial recruitment.	Method of recruitment.	Remarks.
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1	2	3	4	5	6	7
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1/	Tehsildar	Graduation from a recognised University.	Passing of Tehsidari Departmental Examination and Successful completion of training as may be prescribed by the Government.	28 (a) years.	20% by initial recruitment; (b) 50% by promotion on the basis of seniority-cum-fitness from amongst Jaid Tehsildars; and (c) the remaining 30% vacancies shall be filled in by selection on merit from amongst;	
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NOTIFICATION NO. 23-28/Adm:I dated 31-10-2002.

1) in the entries in column 6 against serial No.1, in clause (c)

(a) for the existing entries of sub-clauses (i) and (ii), the following shall be substituted namely;

(i) Assistants & Senior Scale Stenographers in the offices of Board of Revenue, Director Land Records & Political Agents, & Assistants and Junior Scale Stenographers of the offices of District Officers, (R&E)/Collectors, who are graduate & have at least five years service as such; and

(ii) District Kamungos, District Revenue Accountants and Head Clerks (Revenue), with at least five years service as such; and

(b) clause (iii) shall be deleted

(i) Assistant and Senior Scale Stenographers working in the Office of Board of Revenue and District Collectors who are graduates and have at least three years service as such;

(ii) District Kamungos with at least three years service as such; and

(iii) Head Clerks (Revenue) in the district Collectors' offices with at least three years service as such;

Deleted

list of Subordinate service for the purpose of promotion against 30% quota of the posts of Tehsildars shall be called with reference to their respective date of eligibility.

NOTE: The office as Tehsildar's course in the Revenue School have to pass prescribed exam in the prescribed periods

S.No.	Nomenclature of the post.	Qualification for Appointment by initial recruitment.	Qualification for Appointment by Promotion.	Age limit for initial recruitment.	Method of recruitment.	Remarks.
1	2	3	4	5	6	7
2/	Naib. Tehsildar	Graduation from a recognized University.	Passing of Naib Tehsildari Departmental Examination and such training as may be prescribed by the Government.	21 to 28 Years.	(a) 50% by initial recruitment, of which 10% shall be reserved for ex-service man, through Public service Commission based on the result of a competitive examination conducted by it in accordance with the syllabus. (b) 34% by promotion on the basis of seniority cum-fitness from amongst Managers in the Division with at least five years service as such; (c) 12% by selection on merit from amongst Assistants and Senior Scale Stenographers of Board of Revenue, Director Land Records and the offices of the political Agents and Assistants and Junior Scale Stenographers in the offices of District Officer (Revenue & Estate) / Collectors with three years service as such;	

NOTIFICATION NO. 23428/Admn:I dated 31-10-2002.

(2) in the entries in column 6 against serial No.2.

- (a) in clause (b), for the words "five years", the words "three years" shall be substituted.
- (b) for clause (c), the following shall be substituted namely:
- (c) 12% by selection on merit from amongst Assistants and Senior Scale Stenographers of Board of Revenue, Director Land Records and the offices of the political Agents and Assistants and Junior Scale Stenographers in the offices of District Officer (Revenue & Estate) / Collectors with three years service as such;
- (c) the following Note shall be added in column 6 below the existing entries as amended above, namely;

Subs. Label

(c) 12% by selection on merit from amongst Assistants and Stenographers working in the offices of Board of Revenue, District Collectors and Director Land Records who have five years service as such;

NOTE:
"The official so appointed as Naib Tehsildar shall undergo a training course in the School save to the present with the probationary examination with the probationary period"

27

17

S. No.	Nomenclature of the post	Qualification for Appointment by initial recruitment	Qualification for Appointment by Promotion	Age limit for initial recruitment	Method of recruitment
1	2	3	4	5	6

3/	District Kanungo (Sadar Kanungo)		Passing of Naib Tehsilgari Departmental Examination and such training as may be prescribed by the Government		By promotion on the basis of seniority, length of service and age not less than 25 years and not more than 35 years
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4/	Kanungo		Passing of Kanungo Departmental Examination and successful completion of such training as may be prescribed by Government		By promotion on the basis of seniority, length of service and age not less than 25 years and not more than 35 years
----	---------	--	---	--	---

5/	patwar	7-A or equivalent qualification, who have passed the paway examination		18 to 30 years	By promotion on the basis of seniority, length of service and age not less than 18 years and not more than 30 years
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6/	Tensil Revenue Accountant/ Wasil 3841 Nawis/Adal Wasil 3841 Nawis	F. A or equivalent qualification from a recognised board			By promotion on the basis of seniority, length of service and age not less than 18 years and not more than 30 years
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28-

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Kashif Jamal

VR

SMBR etc

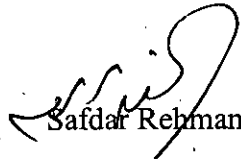
Subject: Parawise comments in appeal No. 3243/21 title as Kashif Jamal VS SMBR etc

R/Sir,

1. That the respondent No.4 refuse promotion due to his domestic problems because the mother of the respondent No. 4 is seriously ill by the reason respondent No.4 refuse his promotion in twice .
2. That the petitioner Kashif Jamal is not next senior from respondent No. 4. Respondent No.4 qualified his Qunoongo exam prior to the petitioner is so junior then Respondent No.4 For the reason petitioner Kashif Jamal is not entitled to file the present petition before this Hon'ble court.
3. That the respondent No.4 legally qualified his qualification therefore respondent No.4 appointed (Promoted) as office Qunoongo in district Kohat.

In view of the above it is prayed that appeal may please be dismissed rejected as no substance is available in the case. All concerned documents are attached herewith petition of the petitioner.

Dated 09-07-2021


Safdar Rehman

Respondent No.4
Office Qunoongo Kohat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 3243/2021

Kashif Jamal

VERSUS

SMBR ETC

AFFIDAVIT

I, Safdar Rehman S/o Abdul Jan R/o Office Qunoongo, Kohat City, ,
do hereby solemnly affirm and declare on oath that all the
contents of instant **PARAWISE COMMENTS** are true and correct to
the best of my knowledge and belief and nothing has been
concealed or misstated from this Honourable Tribunal.

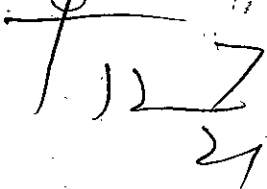
Deponent


SAFDAR REHMAN

CNIC # 14301-8500439-1

Contact # 0333-4742916




24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In Re Civil Appeal # _____

Kashif Jamal

Versus

SMBR and others

PARA WISE COMMENTS ON BEHALF OF
RESPONDENTS NO.5

Respectfully Sheweth,
Preliminary Objections:

1. That the appeal of the appellant is not maintainable in its present form.
2. That the appellant is estopped by his own conduct to file the instant appeal.
3. That the appellant has got no cause of action to file the present appeal.
4. That the appeal is bad for misjoinder and non joinder of necessary parties.
5. That the appeal of the appellant is badly time barred.
6. That this Hon'ble Court has got no jurisdiction.

ON FACTS:-

Para No.1 of the appeal pertains to record and needs proof.

- i. Incorrect.
- ii. Incorrect, ^{appellant} appeared but failed in patwar exams.
- iii. Correct only to the extent the appellant passed Patwar examination on 27.02.2003 while respondent No.5 passed patwar exam on 26.11.1996.
- iv. Correct while respondent No.5 appointed as patwari on 25.06.2002.
- v. Pertains to record.
- vi. Incorrect.
- vii. Pertains to record.
- viii. Correct because court observations against appellant and order dated 08.09.2020 is legal (Copy of order sheet is attached).

2. Incorrect

3. Pertains to record.

4. Incorrect . /

5. Incorrect

6. Pertain to record.

7. Incorrect.

Grounds:-

A. Incorrect

B. Incorrect.

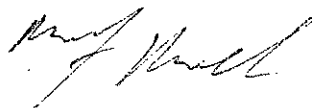
- i. Incorrect
- ii. Pertain to record.
- iii. Incorrect
- iv. Pertain to record.
- v. Pertain to record.
- vi. Incorrect.

D. Incorrect. The seniority of patwari to further promotion to kanungo is considered from the date of their appointment as regular patwari.

It is therefore requested that on acceptance of the parawise coments the appeal of the appellatnt may kindly be dismissed with cost.

Respondent No.5

In person



BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In Re Civil Appeal # _____

Kashif Jamal

Versus

SMBR and others

Affidavit:

I, Musharaf Mushood S/o Maqbool Ahmad R/o Mohallah Pir Abdullah Shah Kohat City, do hereby solemnly affirm and declare on oath that contents of the instant written statement are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

CNIC# 14301-1939068-9

Musharaf Mushood
ATTESTED



Musharaf Mushood
12-07-2021

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Kashif Jamal

VR

SMBR etc

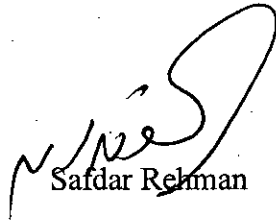
Subject: Parawise comments in appeal No. 3243/21 title as Kashif Jamal VS SMBR etc

R/Sir,

1. That the respondent No.4 refuse promotion due to his domestic problems because the mother of the respondent No. 4 is seriously ill by the reason respondent No.4 refuse his promotion in twice .
2. That the petitioner Kashif Jamal is not next senior from respondent No. 4. Respondent No.4 qualified his Qunoongo exam prior to the petitioner is so junior then Respondent No.4 For the reason petitioner Kashif Jamal is not entitled to file the present petition before this Hon'ble court.
3. That the respondent No.4 legally qualified his qualification therefore respondent No.4 appointed (Promoted) as office Qunoongo in district Kohat.

In view of the above it is prayed that appeal may please be dismissed rejected as no substance is available in the case. All concerned documents are attached herewith petition of the petitioner.

Dated 09-07-2021


Safdar Rehman

Respondent No.4
Office Qunoongo Kohat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 3243/2021

Kashif Jamal

VERSUS

SMBR ETC

AFFIDAVIT

I, Safdar Rehman S/o Abdul Jan R/o Office Qunoongo, Kohat City, ,
do hereby solemnly affirm and declare on oath that all the
contents of instant **PARAWISE COMMENTS** are true and correct to
the best of my knowledge and belief and nothing has been
concealed or misstated from this Honourable Tribunal.

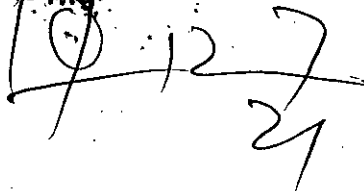
Deponent


SAFDAR REHMAN

CNIC # 14301-8500439-1

Contact # 0333-4742916




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