# BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No.1184/2022

Fida Hussain Patwari

(APPELLANT)

### **VERSUS**

Govt. of Khyber Pakhtunkhwa through SMBR and others.

(RESPONDENTS)

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(NOOR SAEED)

Superintendent O/o DC Kurrram CNIC # 14101-0805382-5 Mobile # 0331-9809900

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# **BEFORE THE KHYBER PAKHTUNKHWA SERVICE**

# TRIBUNAL PESHAWAR

Serven Tempunat

Appeal No.1184/2022

Fida Hussain Patwari

Date 20-06-23

#### Versus

Govt of Khyber Pakhtunkhwa through SMBR & others......Respondents

## PARA WISE COMMENTS ON BEHALF OF RESPONDANT NO-01 & 03

### Respectfully Shewith:-

### PRELIMINARY OBJECTIONS

- 1. That the appellant has got no locus standi/cause of action against the answering respondent as the seniority list in question has been properly issued by the answering respondent in accordance with rules and observations of this honorable Tribunal
- 2. That the instant appeal is based on mala fide and the appellant has not come to this Honorable court with clean hands.
- 3. That the appellant is estopped by his own conduct to bring the appeal in hand
- 4. That no vested legal or acquired rights of the appellant have been infringed to warrant interference

### **ON FACTS:**

- 1. As per record, this para is correct. However it is added and explained that the appellant was appointed as patwari on 21.07.1996 on <u>purely temporary</u> <u>basis</u> while later on his service confirmed on 17.02.2006(Copies annexed as "A" & "B")
- 2. This para relates to the record and is correct.
- 3. Correct.
- 4. No comments. Not related to the answering respondent.
- 5. No comments. Not related to the answering respondent.
- 6. Correct to the extent that the appellant preferred execution petition No.57/2020 before this honorable Service Tribunal
- 7. Correct to the extent that the appellant preferred COC NO.70/2020 in this honorable Tribunal.
- 8. This para of the appeal is correct to the extent that the seniority list has been issued by the answering respondent vide dated 18.01.2022 but the



P-02

remaining para is wrong and incorrect. The answering respondent No.03 in compliance of the judgment of this honorable Tribunal dated 26.11.2019 constituted a committee, comprising of Additional Deputy Commissioner Kurram, Assistant Commissioner Upper Kurram, Assistant Commissioner Lower Kurram and Tehsildar Upper Kurram(Mahal) who scrutinized all the relevant service record of the appellant and private respondents as per observations recorded by this honorable Service Tribunal and thereafter submitted comprehensive report to the answering respondent vide dated 02.12.2021 and in light of this report seniority list of the regular patwari of District Kurram was issued on 18.01.2022(Copy of the committee report and seniority list is annexed as "C" and "D" respectively). Accordingly implementation report was submitted in this honorable Tribunal and where after the execution petition No.57/2020 has been decided by this honorable Tribunal on 14.07.2022.It is pertinent to mention here that the said seniority list ,issued on 18.01.2022 and judgment of the this honorable Tribunal dated 15.07.2022 were also discussed in detail in the Departmental Promotion Committee in its meeting held on 06.12.2022 so as to consider promotion case of the private respondents. The Departmental Promotion Committee's members also satisfied with the aforementioned seniority list and accordingly promoted the private respondents Mr.Janat Khan and Muhammad Amin from the post of Patwari BPS-09 to the post of Field Kanungo BPS-11 (Minutes of the DPC meeting held on 06.12.2022 is annexed as "E")

- 9. This para of the appeal is correct to the extent that the appellant preferred Departmental appeal before the appellant authority.
- 10. In this connection it is submitted that directions of the respondant-02(Appellant authority) dated 18.05.2022 has been complied of by the answering respondent in letter & spirit. Detail reply has already been submitted in para No.08 above.
- 11. This para of the appeal is correct.
- 12. In this connection it is humbly submitted that the appellant has got no cause of action against the answering respondent in light of the above stated submission.

### **GROUNDS:**

A. This para of the appeal is totally wrong, incorrect and baseless, hence denied. The seniority list in question has rightly been issued by the answering respondent as explained in para-08 above.



- B. The appellant has been treated by the answering respondent in accordance with law & rules. The detail reply has been given in para-08 above.
- C. This para is totally incorrect and wrong, hence denied. The appellant has been treated in accordance with relevant law/rules. The detail reply has already been submitted in para-08 above.
- D. This para is totally incorrect and wrong, hence denied. The detail reply has already been submitted in para-08. In addition to the submission in para-08, it is submitted that the appellant was appointed as Patwari on **21.07.1996** on purely temporary basis and confirmed his service on **17.02.2006** while services of the private respondents were confirmed on **06.04.1998** vide order in case file No.07/SKGO,dated 29.09.1997(Copy of confirmation order of the appellant ,dated 17.02.2006 and the confirmation order in case file dated 29.09.1997 in respect of the private respondents are annexed as "B"& "F" respectively)
- E. This para is totally incorrect and wrong, hence denied. The detail reply has already been submitted in para-08 and para-D above.
- F. This para needs no reply
- G. This para needs no reply.

In view of the above mentioned facts it is humbly prayed that the instant appeal, being devoid of any merit, may very graciously be dismissed.

Commissioner Kohat Division

Kohat

(Respondent NO.02)

Deputy Commissioner

Kurram

(Respondent No. 03)

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# OFFICE OF THE POLITICAL AGENCT KURRAM

ORDER.

OKDEK.		,	. :		•
NO	· · · · //	Acctt: Conse	Pallent up on the	Dated: 21/7/19	96
Kanungo, the following	g Candida	tes are hereb	y appointed as Paty	omotion of Rajab Ali etc as vari in BPS-5 against the	s Field
posis with immediate e	ffect subjec	t to the produ	ction of health and a	ige certificate:-	vacant
<ol> <li>Muhammad Ya</li> <li>Parachinar</li> </ol>	iseen s/o Fa	ızal Rehman (	caste Matani village	Shublan, Kurram Agency	
2. Fida Hussain s	o Manzoor	Hussain cast	e Bangash village S	halozan ,Kurram Agency,	•
They will rema	in on probat	ion for a perio	od of one year.		
				ination without assigning at	<b>1</b> 17
reason.	٠.	I		· · · ·	1y
No.3773-73/Acctt:		1		Political Agent K	urram
Datad: 21/07/1025				•	

Dated: 21/07/1996

Copy to the -

- 1. Assistant Political Agent Upper Kurram, Parachinar
- 2. Tehsildar Mahal. Kurram for necessary action.
  - 3. Bill clerk

for Political Agent Kurram 21/7/96

AUA ed

# OFFICE OF THE POLITICAL

ORDER .

Dated 3//2 /1996

Acctt: Consequent upon the promotion of Rajab Ali etc as Field Kanungos, the following candidates are hereby appointed as Patwaris in BPS-5, against the vacant posts with immediate effect subject to the production of hodlin and age certificate:-

> Muhammad Yaseen s/o Fazal Rohman Caste Matani village Shublan, Kurram Agency Parachinar. Fida Hussain s/o Manzoor Hussain Caste Bangash villinge Challonan, Kolama Agency, Pleasachdinan-

They will remain on probation for a period of one

year.

Their appointments are purely on temporary basis and limble to termination without applicating an reason.

Political Agent, Kurran.

110, 2772 7 / Kaptt:

Dated 1/2 /1996 Copy to the:-

Assistant Political Agent, Upper Kurram, Parachinar.

Teherliar Mahal, Kurram for necessary secreption

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-Candidates.

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# OFFICE OF THE POLITICAL AGENT, KURRAM

NO.791/Acctt: dated 17/2/2006

# ORDER.

Consequent upon completion of probation period and having served for more than three years satisfactorily, vide Part-III, Part-9(3) of the West Pakistan Patwar subordinate service Rules 1863, the following patwari are hereby confirmed in service with immediate effect.

- 1. Mr.Fida Hussain
- 2. Mr. Muhammad Yasin

Political Agent Kurram

NO. Acctt

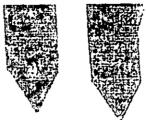
Copy to the:-

- 1. Assistant Polltical Agent Upper Kurram, Parachinar
- 2. Assistant Political Agent, Lower Kurram, Sadda
- 3. Tehsildar Mahal, Kurram Parachinar
- 4. Political Tehsildar Alizai, Lower Kurram
- 5. Official Concerned.

Political Agent Kurram

Augel

Olo Bebah Commissioner



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OFFICE OF THE POLITICISM AND FAMILIESAY.

110-1791 /A-ntt: 2-080 17/2/2006.

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Su (Sy) andent Olo Deblin Commissioner Kurrain

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# OFFICE OF DEPUTY COMMISSIONER TRIBAL DISTRICT KURRAM Phone No. 0926-310777, 313599,313532 Email: addl.pa.786@gmail.com

No	<u>80                                     </u>	_/ADC	; (G)/Reader/Kurram
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Dated: 02/12/12021

To

The Deputy Commissioner, District Kurram.

Subject:

SENIORITY LIST OF PATWARIS

Memo:

Reference to the Deputy Commissioner Kurram order No: 13141-43/DC(Kurram)/St-15 dated: 13/10/2021 regarding the Service Tribunal Peshawar appeal No. 603/17 dated26-11-2019 and High Court decision No.37 of the 2018 in WP No. 2751-P dated 21-06-2018 on the subject cited above.

It is stated that the perusal of the Khyber Pakhtunkhwa Service Tribunal Peshawar order dated 26-11-2019 state that "Janat Khan was appointed as Patwari on Adhoc basis, through order dated 14-09-1988. As his appointment was made on adhoc basis, therefore, he was not entitled to be assigned seniority from the date of adhoc appointment".

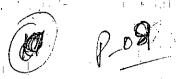
In this connection, all the available record including the initial appointment orders and the original service books record was perused. The same reveals that patwari Janat Khan was appointed on temporary/Adhoc basis vide order No. 10304-07/Acctt: dated 14-09-1988.

Later on, Janat Khan alongwith other patwaris were regularized/confirmed by the then Political Agent on dated 06-04-1998 (copy enclosed) through case file No. 07/SKGO dated 29-09-1997. The seniority of janat khan in light of the mentioned record as to be considered with effect from 06/04/1998 and not 14/09/1988.

It is further mention here that Fida Hussain was initially recruited as Pawtari in BPS-05 purely on temporary basis vide order No.3773-77/Acctt: dated 21-07-1996 while in the KP service tribunal Peshawar order dated:26/11/2019 it has been

AUMEN

Cho Debrith Commissioner



entioned that "Fida Hussain was appointed on regular basis vide order dated:21/07/1996" which does not tele with the original appointment order of Patwari fida Hussain. His service got regularized vide order No. 792-97/Acctt: dated 17-02-2006. Proper entries have been made in his service book. (Copy enclosed).

Thus, in light of above discussion, the seniority has to be withdrawn from the date of the confirmation of the Patwaries as mentioned in their service books.

Hence, seniority list with drawn in light of the rules in above discussion is attached as (annexure "A") and submitted for consideration please.

Tehsildar Mahal Parachinar

Assistant Commissioner Upper Kurram\_

Assistant Commissioner Lower Kurram

Additional Deputy Commissioner (G)
District Kurram

AUNTED

Cio Debnih Commissioner

Annor-Cpage-06

# SENIORITY LIST OF REGULAR PATWARIS DISTRICT KURPAM

S/No	Name & Parentage	Date Of	Qualification	Date Of	Date Of Confirmation	Remarks
•		Birth		Appointment		. =
1	Janat Khan S/O Nadar Khan	05-04-1969	Matric	14-09-1988	-06-04-1998	Promoted as FKGO On-
			,			Acting Charge Basis —
2	Muhammad Amin Khan S/O Baz Khan	16-01-1966	Matric	14-01-1990	06-04-1998	Promoted as FKGO On
		_ }				Acting Charge Basis
3	Ashiq Ali S/O Ghulam Ali	1964	ВА	14-01-1990	06-04-1998	Promoted as FKGO On-
		<u> </u>				Acting Charge Basis
4	Alamgir Khan S/O Sardar Khan	12-04-1966	Matric	14-01-1990	06-04-1998	
5	Asghar Hussain-S/O Mukhtar Ali	18-03-1963	-Matric	15-01-1990	15.01.1990 (confirmed on 15-	Not el gible to
			ŀ		01-1990 but dismissed due to	confirmation of he
		1	-		untrained on 25-12-1999 and	has not propert
		į		] }	re-instated on 04-03-2011	bone Dutwer Ex
		<u> </u>			without back benefits	-
5	Syed Mumtaz Ali Shah S/O Said	11-05-1970	Matric	18-01-1992	06-04-1998	
<u> </u>	Muhammad Akbar			•		
<i>i</i>	Muhammad Yasin S/O Fazal Rehman	02-04-1969	FA	22-07-1996	17-02-2006	
	Fida Hussain S/O Manzoor Hussain	15-02-1970	MA	22-07-1996	17-02-2006	_
	Muhammad Zaman S/O Hussain Ghulam	05-03-1967	FA	28-03-2000	28-02-2018	
0	Israr Hussain S/O Hussain Ghulam	20-03-1968	BSc	28-03-2000	19-07-2018	
1 :	Abrar Hussain S/O Dildar Hussain	03-01-1972	BA .	28-03-2000	19-07-2018	
2	Shoukat Ali S/O Muhammad Younas	26-05-1979	FA _	11-11-2004	_07-05-2013 -	·
3 .	Jamshid Iqbal Bangash S/O Miromian	05-05-1979	FA	01-02-2006	16-05-2014	
4	lmran Khan S/O Hassan-Khan	.06-02-1986	MA	21-09-2006	21-09-2007	

SAMS mut conclude

Tehsildar Wahal Upper Kurram

Assistant Commissioner Upper Rurram

Assistant Commissioner Lower Kurram

Additional Deputy Commissioner (G) Kurram

Caputy Commissioner Kurram

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Suker/Intendent

# SENIORITY LIST OF REGULAR PATWARIS DISTRICT KURRAM

S/No	Name & Parentage	Date Of Birth	Qualification	Date Of Appointment	Date Of Confirmation	Remarks-
 	-Muhammad Mustafa S/O Muhammad	07-04-1984	FSc	14-04-2008	14=04-2009	
_	Shah	22.02.1097	MA	16-06-2010	15-07-2013	
16 .	Timtiaz Hussain S/O Iqbal Hussain ♥	22-03-1987	BA	15-02-2011	24-07-2013	
17	Ghilaf Hussain S/O Israr Hussain	30-04-1985		-05-03-2012	23-01-2018	
18	Dildar Hussain S/O Sardar Hussain	13-02-1982	FA FA	24-06-2013	08-04-2020 -	
19	Bismillah Khan S/O Gul Mat Khan	06-03-1980		28-06-2013	10-11-2015	
20	Muhammad Faroog S/O Sardar Ali	20-03-1984	MA	28-06-2014	23-01-2018	
21	Syed Adil Hussain S/O Syed Aqil Hussain	03-03-1987	FSc	07-12-2018	07-12-2018	
22	Shoaib Hussain S/O Imran Ali	15-02-1988	MA	09-01-2020	09-01-2020	
23	Sved Rahim Shah S/O Syed Badshah	01-01-1984	FA	09-01-2020	09-01-2020	-
_ <del></del> _	Syed Asif Ali Shah S/O Syed Minhaj Ul	14=05-1995	FSc	03-01=5.050	05 01 2020	
-	Hassan		FC -	09-01-2020	09-01-2020	
25	Noor UI Haq-I S/O Qadar Khan	05-04-1993	FSc	09-01-2020	09-01-2020	· .
26	Iftikhar Hussain S/O Sajjad Hussain	05-04-1985	FSc	09-01-2020	09-01-2020	
27	Nasir Hussain S/O Mir Afzal	10-04-1993	FA _	09-01-2020	09-01-2020	
28	Noor Ul Haq-II S/o HajidAkhunzada	25-04-1993	FSc	03-01-2020	00 01 2020	

Tehsildar Mahal Upper Kurram

Assistant Commissioner Upper Kurram

Assistant Commissioner Lower Kurram

Deputy commissioner Kurram

Additional Deputy Commissioner (G) Kurram

AMNEX

# OFFICE OF THE DEPUTY COMMISSIONER

# KURRAM

NO.2749-54/DC(Kurram)/Estab

Dated Parachinar -7/12/2022

P-12 " - | | | | | | | | | | | | | |

# INUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD ON 06.12,2022 AT 11.00AM

The subject meeting was held on 06.12.2022 at 11.00AM under the chairmanship of the Deputy Commissioner Kurram in his office.

The following attended the meeting

- 1. Deputy Commissioner Kurram -----Chairman
- 2. Additional Deputy Commissioner (F/P) Kurram
- 3. Secretary to Commissioner Kohat Division Kohat/Representative of Board of Revenue, Khyber Pakhtunkhwa
- 4. Assistant Director (IT) DC office Kurram
- 5. Superintendent DC office Kurram

Meeting started with recitation from the holly Quran. The chair welcomed the participants and the following agenda was placed before the forum.

AGENDA POINT:

PROMOTION OF PATWARI (BPS-09) TO THE POST OF FIELD KANUGO (BPS-11).

The forum was apprised that there are total 03 sanctioned posts of the field Kanungo in the office of the Deputy Commissioner Kurram. Out of the sanctioned posts, two posts of the field Kanungo (FKGOs) are lying vacant since 2017 due to seniority dispute amongst the patwari. The case of seniority was decided by the Service Tribunal Khyber Pakhtunkhwa on 15.07.2022

According to the Seniority list dated 18.01.2022, Mr Janat Khan and Muhammad Amin are the senior most Patwari who are already working as Field Kanungo on acting charge basis since 01.02.2018.

The Patwari in panel have also passed the Departmental Examination of field Kanungo in the year 1999.

AUSTED

O/o Deputy Commissioner Kurram Page 01/02

In terms of the provision of the Notification 1942/Estt:1/135/SSRC,dated 23,01.2015 the post are required to be filled in by way-of promotion on the basis of seniority -cum-fitness from the amongst the Patwaris and Naib office Kanungo of the District Concerned with atleast three year service as such and who have passed the Departmental examination of Kanungo.

Accordingly the committee examined record of the following patwari in panel according to the seniority list as stood on 31.12.2021 and made the following recommendations.

S#	Name of Patwari	Recommendations/Remarks
1	Mr. Janat Khan	He was found suitable and recommended for promotion to the post of Field Kanungo(BPS-11) on regular basis subject to verification of his documents(i.e. Result of the departmental examination of Field Kanungo etc).
2	Muhammad Amin	He was found suitable and recommended for promotion to the post of Field Kanungo(BPS-11) on regular basis subject to verification of his documents (i.e. Result of the departmental examination of Field Kanungo etc).

The meeting ended with mutual thanks

Additional Deputy Commissioner (Finance & Planning) Kurram

Assistant Director (IT)

Secretary to Commissioner Kohat Division Kohat/Representative of Board of Revenue & Estate Department

Superintendent Deputy Commissioner Kurram

Deputy Commissioner Kurram

Commissioner

Ry

# ATTENDANCE SHEET, DPC MEETING HELD ON 06.12.2022

0.4	3.7		<u></u>	
S#	Name	Designation	Department	Signature
1	Asif Kamran	ADC(FqP)	in I	
2	Haide Hissan	Gray! 45 Quiny: Kot	at	man
3	Noor Saced	Supat	I office	(May)
5	Aman Ullah	AD-17 FEP KUNTAM	FIP 010 DC (Kumm)	hos.
6				•

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Film Synth March

## ORDER

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The following Patwari candidates are hereby appointed as Patwaris in Kurram Agency w.e.f. 9.9.1988 on temporary and adhoc basis subject to the production of age and health certificate.

- 1. Mr. Ashiq Hussain s/o Khadim Hussain of village Kunj Alizai
- 2. Mr. Janat Khan s/o Nadir Khan of village Dandar

Their appointment would be made regular only after they qualify the Patwar training from a Patwar training. School or the competent authority relax rule regarding non passing of Patwar examination in their case.

Political Agent Kurram Agency Parachinar

No:10304-07/Acctt

Dated 14.9.1988

Copy forwarded to the:

- 1. Agency Accounts Officer Kurram Parachinar
- 2. Tehsildar Mahal Kurram Parachinar
- 3. Official concerned.

Political Agent

Kurram Agency Parachinar

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# مثل نمبر 97/ SKGO/07/ مور خد 97-99-99، فائل نسبت اخراج نام پنواريان ومستقل پنواريان

جناب عالى:

بانغميل حكم الحضور مور نجه -1997-20- 23 عرض كي جاتى ہے-

اب امید وارن میں ہے امید وران نمبر روان نمبر 21 محمد زمان ولد حسین علام، نمبر وان نمبر 630 محمد طاہر ولد سر دار علی نے درخواست گزاری ہے۔ کہ فیل شدہ پٹوریان عابد حسین نمبر روان 05 واصعر حسلین، نمبر وران +34 کی جگہ ہماری تقررری کی جائے۔۔

عابہ حسین واصعر طسین کی سال 990 میں تقرری ہو چکی ہے۔ جس وقت پٹوار سکول نہیں کھولاتھا۔ جنہوں نے سال 1993–99 میں پٹوارٹریننگ سکول میں شمولیت احتیار ایک پرچہ نیل کر چکے ہیں۔ جنکے دو چانس حتم ہو چکے ہیں اور ایک چانس باقی ہے۔ جس کواس بارہ حسب ضابطہ نوٹس بھی دیا گیا ہے۔ کہ اس دفعہ آپ پھر فیل ہوئے تو نہ کی جگہ پاس شدہ امید وران کی تقرری کی جائیگی۔

پٹواری حلقہ کڑمان جو عرصہ چارماہ سے بخت بیار ہے۔ اور اب دوبارہ تین ماہ رخصت کی درخواست گزار چکے ہیں۔ جوسخت بیار ہے۔ اور فرایض منصی دینے سے قاصر ہے۔ تولہذااس کی جگہ سینئر امید وار محمد زمان کی رپورٹ بھی کر چکے ہیں،

عابد علی پٹواری حلقہ قباد شاہ خیل جوماہ روان جون میں پنشن لے رہے ہیں۔اسکی جگہ محمد طاہر کی تقرری کی جائے گیا۔اگر فیل شدہ پٹواریان اصعر حسین ،عابد حسین دوبارہ فیل ہوئے توان کی سینئر امید واران کی تقرری جائینگی۔

:01 علاوہ ازیں۔ مطابق فہرست مشمولہ برصفحہ نمبر 06 تا20 میں نمبر وران 23,20,18,16,11,10,09,04,03,01 کی عرصہ ملاز مت ابن مقررہ میعاد مستقل تجاوز کر چکاہے۔ جس کی امطابق مستقلی کی جاتی ہے۔

02۔ علاوہ از این نمبر روان 24،22،17،15،14،13،08،07،06،02 تا27 کل 13 امیدوران جو حالیہ پٹوارٹریننگ سکول میں شمولیت احتیار نہلین کی اور بعض نے دو سری ملاز مت احتیار کی ہے۔ جس کی مطابق لینڈریکارڈ مینول 9.3 کے تحت احراج نام از راجسٹر امیدوران ہونی جائے۔

پس آگرِ منظوری رائے عالی ہو تو مدنمبر 01 میں دہل پٹواریان کی مستقلی اور 13 کی اخراج کا تھم صادر فرمایا جاویں۔

-\$d-

-sd-(forwarded please)

Tehsildar Mahal (01.04.98)

Assistant Political Agent upper Kurram (01.04.98)

-sd-

Political Agent

Allowed per rule (06.04.98)

AUARd

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Super(M) ndent O/o Deputy C) mmissioner Kurram

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O/o Deputy Commissioner Kurram

V. Zam IK.



# OFFICE OF THE COMMISSIONER KOHAT DIVISION \_ KOHAT

Ph: 0922-9260001-3 0922-9260232

Fax:0922-9260105 0922-9260385

Commissioner Kohat Division, Kohat

/Reader/Cmr-Kt

commissionerkht commissionerkohat@gmail.com

Dated Kohat June, 16, 2023

# AUTHORIT LETTER

Superintendent, Deputy Commissioner Office, Kurram is hereby authorized and directed to attend Khyber Pakhtunkhwa Service Tribunal on 21-06-2023 and subsequent dates (if any) on behalf of the undersigned in Appeal No.1184/2022 titled as Fida Hussain Patwari vs Govt of Khyber Pakhtunkhwa through SMBR etc,

> COMMISSIONER KOHAT DIVISION KOHAT

Copy forwarded to the :-

Superintendent, Deputy Commissioner Office, Kurram with the direction to collect the joint para wise comments duly signed by Respondent No. 02 & 03 from this office and submit the same in Khyber Pakhtunkhwa Service Tribunal

2. PS to Commissioner, Kohat Division, Kohat.

Secretary to Commissioner, Kohat Division, Kohat.

# BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER

Service Appeal No.1184/2022

Fida Hussain Patwari

(APPELLANT)

### **VERSUS**

Govt. of Khyber Pakhtunkhwa through SMBR and others.

(RESPONDENTS)

## **AFFIDAVIT**

I Mr. Noor Saeed, Superintendent (BPS-17), O/o the Deputy Commissioner, District Kurram do hereby solemnly affirms and declared that the Parawise Comments in the instant service appeal are true and correct to the best of my knowledge and belief and nothing has been oath that concealed from this Honorable Court. H

(NOOR SAEED)

Superintendent O/o DC Kurrram CNIC'# 14101-0805382-5 Mobile # 0331-9809900