

**SCANNED  
KPST  
Peshawar**

16.10.2018

Counsel for the appellant present and seeks adjournment.  
Granted. Case to come up for preliminary hearing on 23.11.2018  
before S.B.

(Ahmad Hassan)  
Member

23.11.2018

Counsel for the petitioner present and requested for  
adjournment. Adjourned. To come up for preliminary  
hearing on 14.01.2019 before S.B.


  
Muhammad Amin Khan Kundi  
Member

14.01.2019

Nemo for appellant.

Case called several times. It is now 2.15 PM and no one  
is in attendance on behalf of the appellant.

Dismissed for non-prosecution. File be consigned to the  
record room.

  
Chairman




Announced:  
14.01.2019

Form -A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 897/2018


S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	17/07/2018  18-7-2018  20.08.2018	<p>The appeal of Mr. Tasawar Khan resubmitted today by Mr. Nasir Mehmood Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>The case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21-8-2018</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to Eidul Azha vocations The case is adjourned to 16/10/2018.</p> <p style="text-align: right;"> READER</p>

The appeal of Mr. Tasawar Khan Tehsildar Board of Revenue Peshawar received today i.e. on 04.07.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- 1- Addresses of respondent No. 3 to 21 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Copies of promotion orders of private respondents mentioned in para-A of the grounds of appeal (Annexure-D) are not attached with the appeal which may be placed on it.
- 5- 23 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1337 /S.T,

Dt. 05/07 /2018.

  
REGISTRAR 5/7/18  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Nasir Mehmood Adv. Pesh.

*Resubmitted After doing  
one set full*  


STAIT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No. 897/18

Tasawar Khan .....Appellant

Versus

Senior Member Board of Revenue and others.....Respondents

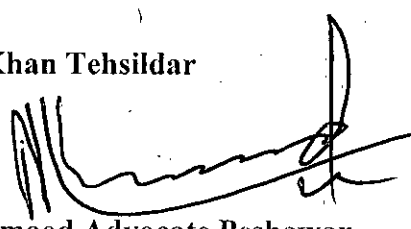
Subject: Service appeal.

Index

S.No	Documents	Annex	Page
1.	Memo of Service Appeal	---	1 to 3
2	Final Seniority List of Tehsildars	A	4-8
3	Departmental Appeal	B	9
4	Disposal of Departmental Appeal vide letter dated 7-6-2018.	C	10
5	Promotion order of Sub Registrars Abdul Qayum and Wahidullah	D & E	11-12
6	Upgradation of the post of Assistant	F	13
7	Affidavit	-	14
8			

Tasawar Khan Tehsildar

Through



Nasir Mehmood Advocate Peshawar

(A)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal NO 897 / 2018

Tasawar Khan Tehsildar Board of Revenue KPK Peshawar.

**APPELANT**

**Versus**

1. Chief Secretary, Govt of KPK Peshawar
2. Senior Member Board of Revenue Peshawar
3. Mr. Abdul Qayum Tehsildar Lahore District Swabi
4. Mr. Waheed Ullah Tehsildar Swabi
5. Mr. Ajam Khan Tehsildar Khar Bajaor Agency
6. Mr. Muhammad Javed Tehsildar Lower Tanawal District Abbottabad
7. Mr. Shah Nadeem Tehsildar Nowshera
8. Mr. Shakir Ullah Tehsildar Chitral
9. Mr. Munir Ahmad Tehsildar Settlement D.I.Khan
10. Mr. Rahamdad Ullah Khan Tehsildar Dosali North Waziristan Agency
11. Mr. Imtiaz Ali Shah Tehsildar Lachi District Kohat
12. Mr. Khalid Khan Tehsildar Mohmand Agency
13. Mr. Fazali Wadood Tehsildar Inspector Stamp Kohat
14. Mr. Irshad Ali Tehsildar Charsadda.
15. Mr. Amir Nawaz Tehsildar Lal Qilla District Upper Dir.
16. Mr. Shah Wazir Tehsildar Jamroad Khyber Agency
17. Mr. Sikandar Khan Tehsildar Daggar District Buner
18. Mr. Ishtiaq Ahmad Tehsildar Babozai District Swat
19. Mr. Shams-ul-Islam Tehsildar Landi Kotal
20. Mr. Allah Noor Tehsildar Paharpur D.I.Khan
21. Mr. Muhammad Ilyas Tehsildar Khodu Khel District Buner.

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 1113

Dated 07-7-2018

**Filed to-day**

**RESPONDENTS**

**Registrar**

Appeal under section – 4 of Khyber Pakhtunkhwa service Tribunal Act 1974, against the final seniority list Dated 4/4/2018, Wherein the private Respondents at serial No. 67,70 and onward upto Serial No. 87, and against the filing of departmental appeal vide letter Dated 7/6/2018.

**Re-submitted to -day  
and filed.**

*Somali*  
17/7/18  
**Registrar**

Respectfully Sheweth

1. That the appellant and private respondents at serial No. 67,70 and onward upto Serial No. 87 in final seniority list Dated 4/4/2018 were promoted on the same date i.e. 16/11/2017 (Final seniority list Annex – A).
2. That the appellant is placed at serial No. 91 and made him Junior to the above mentioned 19 private respondents, despite the fact that his date of appointment in lower post is 05.3.1992 much earlier than these other private respondents.
3. That the appellant moved departmental appeal against this injustice on 30/4/2018 in which he explained all reasons for which he may be made senior to these private respondents (Annex-B).
4. That vide letter NO EST – 1 / S. List / Tehsildars / 24452 – 58 dated 7/6/2018 the appellant was informed that his departmental appeal has been Filed.(Annex-C)
5. That seeking no other remedy, the appellant has come to this august service tribunal on the following grounds.

**GROUND**

- A. That the private respondents at serial No. 67 and 70 date of promotion to the post of Sub-Registrar is 15/10/2018 which is not shown correctly and wrongly or malafidely reflected in seniority list, their actual date of promotion that is 15/10/2008 is shown vide (Annex – D) ~~D~~ Annex E
- B. On the basis of common seniority lists of Assistant maintained according to which the appellate have been promoted as Tehsildar, the appellant was four step junior to Mr. Tahir Ashrif Tehsildar who has been placed at S.No. 65 of the seniority list of Tehsildar, while the appellant is placed at S.No. 91 of the impugned final seniority list of Tehsildars.
- C. There is no column in the seniority list which may indicate that the Tehsildar who have been placed senior to the appellant in the seniority list of Tehsildars were originally appointed on what posts, the seniority can be considered on the date of promotion as Naib Tehsildar, Sub Registrar, District Kanungo and District Revenue Accountant instead of regular date of appointment to junior posts.
- D. That from serial No. 74 to 87 are Naib Tehsildars recruited through initial recruitment on 02.02.2009.
- E. That the post of assistant was upgraded to BPS 16 on 20/5/2014 and the appellant was in BPS 16 since that date and despite the fact that the appellant was in BPS 16 and private respondents in BPS 14, the appellant is made junior to the private respondents, ( Annex – E)
- F. That as per APT rules 1989 section 17(4) “ The inter-se-Seniority of civil servant in a certain cadre to which promotion is made from different lower posts, Carrying the same pay scale shall be determined from the date of regular appointment / promotion of the civil servants in the lower Posts “

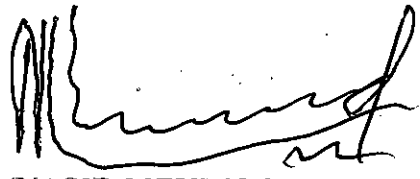
- G. That the impugned seniority list has been drawn in total violation of law and rules governing the principles of seniority.
- H. That the impugned seniority list offends the Article 25 of the 1973 Constitution of Islamic Republic of Pakistan and is liable to be set aside.
- I. That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

**PRAYER**

It is therefore humbly prayed that on acceptance of this appeal, the official respondents may be directed to correct the seniority list dated 4/4/2018 by showing the appellant senior to the above mentioned private respondents. Any other remedy, which this August Service Tribunal deems fit and proper that may also be awarded in favor of the appellant.

  
APPELLANT  
MR. TASAWAR KHAN  
TEHSILDAR

THROUGH

  
(NASIR MEHMOOD)  
ADVOCATE, PESHAWAR.

Annex A.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
BOARD OF REVENUE  
REVENUE & ESTATE DEPARTMENT

Peshawar Dated the 04/04/2018

OFFICE ORDER.

No.Estt:I/(S. List)/Tehsildar \_\_\_\_\_ . In pursuance of Section 8 (i) of the Khyber Pakhtunkhwa, Civil Servant Act, 1973, final seniority list of Tehsildars in Khyber Pakhtunkhwa as it stood on 31.12.2017 is hereby published for circulation of all concerned Tehsildars.

By order of  
Senior Member

No.Estt:I/(S. List)/Tehsildar 16878-84

Copy alongwith a copy of final seniority list is forwarded to the:-

1. All Commissioners in Khyber Pakhtunkhwa with the request to circulate the same amongst the Tehsildars working under their jurisdiction / control for their information.
2. Office order file.

  
Assistant Secretary (Estt)

C.T.C  
Certified to be  
True Copy



5

FINAL SENIORITY LIST OF REGULAR TEHSILDARS BPS-16 IN KHYBER PAKHTUNKHWA  
AS STOOD ON 31.12.2017.

S.No	Name of Tehsildar / Qualification	Date of Birth / Domicile	Date of First entry into Government Service	Date of promotion as Tehsildar on regular basis	Method of Recruitment	Remarks
1	2	3	4	5	7	8
1	Mr. Naveed Qadir (BSc)	16.01.1967 Kohat	01.07.1995	20.03.2008	Direct	Tehsildar
2	Mr. Muhammad Ikram Ullah (M.A)	09.3.1965 DIKhan	01.7.1995	06.09.2008	--do--	--do--
3	Mr. Kiramatullah (M.A)	20.1.1964 Tank.	08.1.1981	06.09.2008	--do--	--do--
4	Mr. Bakhtiar Ahmad (BA)	15.11.1958 Mansehra	26.01.1981	04.10.2010	--do--	--do--
5	Mr. Habibullah Wazir (MA)	08.10.1972 Bannu	24.04.2006	29.10.2011	--do--	--do--
6	Mr. Ali Sher Khan (BA LLB)	15.02.1978 Peshawar	14.02.2004	04.06.2013	--do--	--do--
7	Mr. Abdul Ghaffar (BA)	15.12.1974 DIKhan	14.02.2004	04.06.2013	--do--	--do--
8	Mr. Muhammad Ayub (B.A)	01.03.1964 Bannu	12.06.2006	18.06.2013	--do--	--do--
9	Mr. Hidayat Ullah (BA)	28.04.1962 Malakand	13.03.1991	04.06.2013	--do--	--do--
10	Mr. Shah Nawaz (BA)	01.10.1959 Lakki	11.11.1981	04.06.2013	--do--	--do--
11	Mr. Muhammad Israr (BA)	19.05.1959 Bannu	18.07.1985	04.06.2013	--do--	--do--
12	Mr. Abdul Hadi, MA	18.04.1960 Karak	23.06.1983	18.06.2013	--do--	--do--
13	Mr. Sher Qadar Khan, BA	19-08-1958 Bannu	01.10.1979	18.06.2013	--do--	--do--
14	Mr. Muhammad Rafiqe, MA	20.08.1963 Karak	01.02.1988	18.06.2013	--do--	--do--
15	Syed Ayub Shah, BA	20-06-1961 Peshawar	26.05.1981	18.06.2013	--do--	--do--
16	Mr. Gul Ghazi Khan (Matric)	26.01.1959 Karak	16.03.1983	10.02.2015	--do--	--do--
17	Mr. Asghar Shah (Matric)	25.12.1959 Haripur	25.05.1981	10.02.2015	--do--	--do--
18	Muhammad Taj (FA)	31.05.1966 Haripur	27.03.1986	10.02.2015	--do--	--do--
19	Mr. Said Rehman (Matric)	30.10.1958 Mardan	01.10.1980	10.02.2015	--do--	--do--
20	Mr. Abdur Rehman Shah (BA)	15.02.1985 Bannu	23.01.2007	10.02.2015	--do--	Reverted as Naib Tehsildar
21	Mr. Waheed Ahmad (FA)	01.01.1967 Mansehra	29.01.1986	10.02.2015	--do--	Tehsildar
22	Muhammad Hamayun (FA)	16.03.1969 Charsadda	16.03.1987	10.02.2015	--do--	--do--
23	Muhammad Riaz (Matric)	22.05.1958 Nowshera	06.08.1978	10.02.2015	--do--	--do--
	Syed Mir Laïq Shah (FA)	27.04.1963 Mardan	08.03.1983	10.02.2015	--do--	--do--
	Mr. Asmatullah (Matric)	13.03.1959 Lakki	06.04.1981	10.02.2015	Promotee	--do--

Certified to be  
True Copy

Backup of Tentative Seniority List of Tehsildar 31.12.2017

6

S.No	Name of Tehsildar / Qualification	Date of Birth / Domicile	Date of First entry into Government Service	Date of promotion as Tehsildar on regular basis	Method of Recruitment	Remarks
1	2	3	4	5	7	8
26	Mr. Fatehullah (FA)	10.10.1958 Tank	01.07.1984	10.02.2015	--do--	--do--
27	Muhammad Akram (Matric)	03.10.1959 Tank	01.12.1983	10.02.2015	--do--	--do--
28	Mr. Afzal Khan (FA)	15.03.1959 Swat	05.04.1981	10.02.2015	--do--	--do--
29	Muhammad Farooq Anwar (Matric)	10.09.1958 Tank	23.12.1985	10.02.2015	--do--	--do--
30	Mr. Ghulam Qasim (FA)	28.08.1958 D.J Khan		10.02.2015	--do--	--do--
31	Mr. Sikindar Hayat Shah (Matric)	20.01.1958 Bannu	18.02.1981	07.07.2015	--do--	--do--
32	Mr. Ibrahim Shah (BA)	04.04.1967 Malakand	17.09.1990	07.07.2015	--do--	--do--
33	Mr. Abdullah Jan (FA)	17-10-1958 Charsadda	01.09.1977	28.12.2015	--do--	--do--
34	Mr. Miraj Muhammad (FA)	30.09.1958 Charsadda	31.05.1975	28.12.2015	--do--	--do--
35	Mr. Niamatullah (BA)	11.08.1967 Tank	16.06.1990	28.12.2015	--do--	--do--
36	Mr. Naik Muhammad (B.A)	04.04.1971 Kohat	26.07.1995	28.12.2015	--do--	--do--
37	Mr. Ibrar Ahmad Wazir (MA)	16.11.1987 FR Bannu	01.02.2016	01.02.2016	Direct	--do--
38	Mr. Adnan Khan (BBA)	13.09.1987 Swat	01.02.2016	01.02.2016	--do--	--do--
39	Mr. Abdul Wali Khan (MA)	08.03.1982 Chitral	01.02.2016	01.02.2016	--do--	--do--
40	Mr. Rashid Ali (MBA)	10.01.1977 Peshawar	01.02.2016	01.02.2016	--do--	--do--
41	Mr. Shahab Ud Din (BSC)	30.09.1987 Mohmand Agency	01.02.2016	01.02.2016	--do--	--do--
42	Mr. Fahad Malik (MBBS)	17.12.1986 Peshawar	01.02.2016	01.02.2016	--do--	--do--
43	Mr. Umar Khitab (MA)	10.04.1989 Tank	01.02.2016	01.02.2016	--do--	--do--
44	Syed Asif Iqbal (M Phil)	22.04.1989 Swabi	01.02.2016	01.02.2016	--do--	--do--
45	Mr. Mehran Ilyas (MA)	15.09.1987 Kohat	01.02.2016	01.02.2016	--do--	--do--
46	Mr. Muhammad Junaid Khan (BSC)	10.02.1988 Mardan	01.02.2016	01.02.2016	--do--	--do--
47	Mr. Muhammad Jawad (BSC)	22.05.1989 Chitral	01.02.2016	01.02.2016	--do--	--do--
48	Mr. Muhammad Shafiq (MA)	17.12.1985 Khyber Agency	01.02.2016	01.02.2016	--do--	--do--
49	Mr. Amin Ul Hasan (BBA)	03.11.1986 Mansehra	01.02.2016	01.02.2016	--do--	--do--
50	Mr. Qasim Zia Malik (MA)	10.06.1984 Abbottabad	01.02.2016	01.02.2016	--do--	--do--

Certified to be

ETC

copy

7

S.No	Name of Tehsildar / Qualification	Date of Birth / Domicile	Date of First entry into Government Service	Date of promotion as Tehsildar on regular basis	Method of Recruitment	Remarks
1	2	3	4	5	7	8
51	Miss Mina Zahir (BSC)	06.08.1988 Mardan	01.02.2016	01.02.2016	--do--	--do--
52	Mr. Muhammad Umar (MA)	01.03.1966 Mardan	16.07.2002	15.12.2016	PROMOTEE	--do--
53	Mr. Farman Ali	04.02.1963 Mardan	16.07.2002	15.12.2016	--do--	--do--
54	Mr. Aftab Hussan Shah (BA)	04.05.1958 D.Ikhan	13.09.1980	15.12.2016	--do--	--do--
55	Mr. Raham Taj (Matric)	20.01.1958 Mardan	30.07.1984	15.12.2016	--do--	--do--
56	Mr. Shah Behram (BA)	20.11.1973 Tank	28.06.1997	15.12.2016	--do--	--do--
57	Mr. Amir Muhammad (BA)	06.04.1961 Swabi	28.08.1988	15.12.2016	--do--	--do--
58	Mr. Faiz Ahmad Qureshi (BA)	12.04.1962 Abbottabad	15.08.1982	15.12.2016	--do--	--do--
59	Mr. Abdul Muqsit (MA)	20.01.1965 Mardan	28.08.1988	15.12.2016	--do--	--do--
60	Mr. Jehan Said (M.Com)	10.01.1964 Mardan	28.08.1988	15.12.2016	--do--	--do--
61	Mr. Shahib Zada (BA)	10.11.1961 Mardan	04.09.1988	15.12.2016	--do--	--do--
62	Mr. Zahid Kamal (BA)	18.05.1964 Peshawar	01.03.1990	15.12.2016	--do--	--do--
63	Mr. Habib Ahmad Jan (MA)	01.03.1963 Swat	02.07.1987	15.12.2016	--do--	--do--
64	Mr. Gulibaz Khan (BA)	25.03.1958 Orakzai	24.03.1983	16.11.2017	Promotee	--do--
65	Mr. Tahir Ashraf (MA)	24.01.1970 Abbottabad	28.02.1988	16.11.2017	--do--	--do--
66	Mr. Iqbal Ahmad (Matric)	20.04.1959 Peshawar	14.01.1987	16.11.2017	--do--	--do--
67	Mr. Abdul Qayum (FA)	20.02.1965 Kohat	20.03.1988	16.11.2017	--do--	--do--
68	Muhammad Azam Khan (BA)	08.12.1959 Kohat	14.07.1982	16.11.2017	--do--	--do--
69	Mr. Qazi Ijaz Ahmad (BA)	06.06.1958 Mansehra	09.12.1978	16.11.2017	--do--	--do--
70	Mr. Waheedullah (MA/LLB)	10.02.1973 Dir Lower	20.09.1995	16.11.2017	--do--	--do--
71	Mr. Ajam Khan (BA)	15.06.1963 Khyber Agency	07.10.1987	16.11.2017	--do--	--do--
72	Muhammad Javed (BA)	22.04.1966 Haripur	25.09.1990	16.11.2017	--do--	--do--
73	Mr. Shah Nadeem (BSc)	02.04.1983 Mardan	09.08.2004	16.11.2017	--do--	--do--
74	Mr. Shakir Ullah (M.A M BA)	15.01.1978 Khyber Agency	02.02.2009	16.11.2017	Direct	--do--
75	Mr. Munir Ahmad (MSC)	20.03.1979 SWA	02.02.2009	16.11.2017	--do--	--do--

CTC  
Certified to be True Copy

8

S.No	Name of Tehsildar / Qualification	Date of Birth / Domicile	Date of First entry into Government Service	Date of promotion as Tehsildar on regular basis	Method of Recruitment	Remarks
1	2	3	4	5	7	8
76	Mr. Rahamdullah Khan (MSc. Chem)	18.04.1978 Lakki Marwat	02.02.2009	16.11.2017	--do--	--do--
77	Mr. Imtiaz Ali Shah (MSC)	14.04.1980 Karak	02.02.2009	16.11.2017	--do--	--do--
78	Mr. Khalid Khan(MA)	23.03.1978 Bajaur	02.02.2009	16.11.2017	--do--	--do--
79	Mr. Fazal Wadood (MA)	04.04.1982 Mohmand Agency	02.02.2009	16.11.2017	--do--	--do--
80	Mr. Irshad Ali (MA)	15.03.1978 Mohmand Agency	02.02.2009	16.11.2017	--do--	--do--
81	Mr. Amir Nawaz (BSc/MBA)	22.04.1975 D.IKhan	02.02.2009	16.11.2017	--do--	--do--
82	Mr. Shah Wazir (MSc)	30.03.1980 SWA	02.02.2009	16.11.2017	--do--	--do--
83	Mr. Sikandar Khan (MA)	10.12.1976 Swat	02.02.2009	16.11.2017	--do--	--do--
84	Mr. Ishtiaq Ahmad (MA)	30.04.1979 Malakand	02.02.2009	16.11.2017	--do--	--do--
85	Mr. Shamsul Islam (MA)	10.04.1979 Malakand	02.02.2009	16.11.2017	--do--	--do--
86	Mr. Allah Noor (MA)	11.04.1983 (FR) D.IKhan	02.02.2009	16.11.2017	--do--	--do--
87	Muhammad Ilyas (MSc)	03.03.1975 Swat	02.02.2009	16.11.2017	--do--	--do--
88	Mr. Arshad Mehmood (MSC/LLB)	04.02.1967 Haripur	17.09.1991	16.11.2017	--do--	--do--
89	Muhammad Hasrat Khan (BA)	15.04.1968 Haripur	17.09.1991	16.11.2017	--do--	--do--
90	Mr. Naimatullah (BA)	22.09.1965 Lakki	09.01.1992	16.11.2017	--do--	--do--
91	Mr. Taswar Khan (BA)	15.04.1968 Haripur	05.03.1992	16.11.2017	--do--	--do--
92	Mr. Ishaq Ali Khan (BA)	14.10.1963 Bannu	13.09.1992	16.11.2017	--do--	--do--
93	Muhammad Zaman (BA)	04.01.1968 Bannu	25.10.1992	16.11.2017	--do--	--do--
94	Muhammad Imran Zaman (BA)	05.05.1979 Mardan.	23.04.2008	16.11.2017	--do--	--do--
95	Mr. Khalid Mansoor (MA)	10.03.1974 Peshawar	12.08.2008	16.11.2017	--do--	--do--

etc  
Certified to be  
True Copy

Assistant Secretary (Estt.)

The Senior Member Board of Revenue,  
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL REGARDING CORRECTION IN FINAL SENIORITY LIST OF TEHSILDARS IN KHYBER PAKHTUNKHWA AS IT STOOD ON 31.12.2017.**

Respected Sir,

Kindly refer to Government of Khyber Pakhtunkhwa, Board of Revenue, Revenue & Estate Department, Peshawar Office Order No. Estt:I/(S.List)/Tehsildar/16878-84 dated 04.04.2018 on the subject noted above.

With due reverence, it is submitted that the applicant has been promoted as regular Tehsildar vide Board of Revenue, Khyber Pakhtunkhwa, Peshawar Order bearing No. Estt:I/DPC/Tehsildar/ 2017/25804-42 dated 16.11.2017 out of the seniority list of the Assistants (BPS-16) maintained at Provincial level as per criteria Notified by the Government of Khyber Pakhtunkhwa, Board of Revenue vide No. 1942/Estt:/135/SSRC dated 23.01.2015.

Joint seniority list of Tehsildars as stood on 31.12.2017 has been examined and found that:

- 1) The applicant has been placed at S. No. 91 of the joint seniority list of Tehsildars circulated vide ibid order.
- 2) The applicant was appointed as Assistant on 05.03.1992 in the office of the Deputy Commissioner, Haripur through initial recruitment under the Appointment, Promotion and Transfer Rules-1989.
- 3) On the basis of common seniority list of Assistants maintained at Provincial level, according to which I have been promoted as Tehsildar, the applicant was four step junior to Mr. Tahir Ashraf, Tehsildar who has now been placed at S. No. 65 of the Seniority list of Tehsildars.
- 4) Mr. Tahir Ashraf and the applicant were promoted as Tehsildar under same order issued by the Board of Revenue i.e. No. Estt:I/DPC/Tehsildar/2017/25804-42 dated 16.11.2017.
- 5) Mr. Tahir Ashraf, Tehsildar has been placed at S. No. 65 of the joint seniority list whereas the applicant has been placed at S. No. 91, which created gap of 25 Officers who have been made senior to me in the seniority list of Tehsildars.
- 6) I had joined the service on 05.03.1992 on regular basis as Assistant, as per seniority list the Officers from S. No. 74 to 95 have been shown as "Direct" out of which the Officers from S. No. 74 to 87 have been shown senior to me who are too junior to me both in age and length of service.
- 7) There is no column in the Seniority list which may indicate that the Tehsildars who have been placed senior to the applicant in the Seniority list of Tehsildars were originally appointed on what post, their seniority can be considered from the date of promotion as NT, Sub Registrar, DK and DRA instead of regular date of appointment to junior posts.

It is humbly prayed that combined seniority list of Tehsildars may very kindly be reviewed and proper seniority position may be assigned to the applicant according to the rule / law. In this regard, relevant provision of Khyber Pakhtunkhwa, Civil Servant Act-1973 is reproduced.

*"Civil Servants who are selected for promotion to higher post in one batch shall, on the promotion to the higher post, retain their inter-se-seniority as in the lower post from the date of regular appointment to the post"*

Yours obediently,

Dated: 30/04/2018.

CTC  
Certified to be  
True Copy

Tasawar Khan,  
Tehsildar (U/T),  
Tehsil Haripur.

Annex-c

10

GOVERNMENT OF KHYBER PAKHTUNKHWA  
BOARD OF REVENUE

REVENUE & ESTATE DEPARTMENT

No. Estt-I/S: List/Tehsildar/ 24452-58  
Peshawar dated the 07/06/2018

1. Mr. Niamatullah Kundi.
2. Mr. Ishaq Ali Khan.
3. Mr. Khalid Mansoor.
4. Mr. Muhammad Zaman.
5. Mr. Arshid Mehmood.
6. Mr. Muhammad Hasrat Khan.
7. Mr. Tasawar Khan

Tehsildars

Awaiting for posting in Board of Revenue.

**SUBJECT:- DEPARTMENTAL APPEAL AGAINST FINAL SENIORITY OF  
TEHSILDARS THAT STOOD ON 31.12.2017.**

Your Departmental appeal dated 30.04.2018 against final seniority list of  
Tehsildar for the year 2017 has been examined and filed by appellate authority.

Assistant Secretary (Estt)

CTL

Certified to be  
True Copy

5 No. 67

Annex D

(11)

20

OFFICE OF THE  
DIRECTOR LAND RECORDS/INSPECTOR  
GENERAL OF REGISTRATION, NWFP.

No. \_\_\_\_\_  
Peshawar dated the.....15/10/2008

OFFICE ORDER.

No. \_\_\_\_\_/LR-IV/12-F. On the recommendation of  
Department Promotion/Selection Committee Meeting Mr. Abdul Qayum, Registration  
Muharrir office of the Sub Registrar, Kohat is hereby promoted as Sub Registrar  
(BPS-14) on regular basis with immediate effect.

Sd

INSPECTOR GENERAL OF REGISTRATION,  
NORTH WEST FRONTIER PROVINCE.

No. 8622-27 /LR-IV/12-F.

Copy forwarded to the: -

- 1 All District Officers, (R&E) in NWFP.
- 2 All District Accounts Officer in NWFP.
- 3 Accountant General, NWFP.
- 4 All Sub Registrars in NWFP.
- 5 Official concerned.
- 6 Office order file.

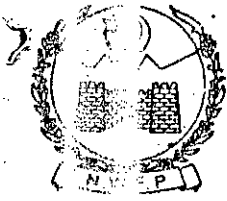
*[Signature]*

INSPECTOR GENERAL OF REGISTRATION,  
NORTH WEST FRONTIER PROVINCE.

*[Signature]*

CTC

Certified to be  
True Copy



AMM  
E

12

28

OFFICE OF THE  
DIRECTOR LAND RECORDS/INSPECTOR  
GENERAL OF REGISTRATION, NWFP.

No. \_\_\_\_\_ /

Peshawar dated the.....15-10-2008

OFFICE ORDER

No 8656 /LR-IV/S.R. In exercise of the power conferred upon under Rule-3 of the West Pakistan Registration Department (Northern Zone) Sub-Registrar Recruitment Rules 1962 and Section-6 of the Registration Act-1908 Mr. Waheed Ullah, (being qualified Registration Moharrir Candidate)/Junior Clerk office of Inspector General Registration, is hereby promoted as Sub-Registrar (BPS-14) on regular basis with immediate effect.

INSPECTOR GENERAL REGISTRATION,  
NORTH WEST FRONTIER PROVINCE.

Endost; No 8657-62 /LR-IV/12-F.

Copy forwarded to the :-

1. Accountant General, NWFP, Peshawar
2. All District Officers (R & E) in NWFP.
3. All District Accounts Officers, in NWFP.
4. All Sub-Registrars, NWFP.
5. Official Concerned.
6. Office Order File.

*Waheed*  
INSPECTOR GENERAL REGISTRATION,  
NORTH WEST FRONTIER PROVINCE.

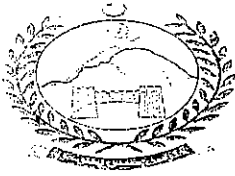
43-7c

CTC  
Certified to be  
True Copy



Annex - 1

13



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

Dated Peshawar, the 20-05-2014

**NOTIFICATION**

**NO.FD/SO(FR)10-22/2014** The competent authority has been pleased to accord sanction to upgradation of pay scales of the following posts in the Civil Secretariat of Khyber Pakhtunkhwa, with immediate effect.

S. No.	Nomenclature of the post	Existing Scale	Upgraded Scale
1	Superintendent	BS-16	BS-17
2	Assistant	BS-14	BS-16
3	Senior Clerk	BS-09	BS-14
4	Junior Clerk	BS-07	BS-11

- i. The pay of the existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.
- ii. The Establishment Department, will amend the service rules to the same effect in the prescribed manner.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

**Endst No. & Date even.**

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

1. PS to Additional Chief Secretary, FATA.
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.
11. Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
12. Registrar, Service Tribunal Khyber Pakhtunkhwa.
13. All the Autonomous and Semi Autonomous Bodies in Khyber Pakhtunkhwa.
14. Secretary to Govt. of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
15. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan.
16. The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Mansehra and Dir Lower.
17. The Treasury Officer, Peshawar.
18. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
19. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
20. PSO to Chief Secretary, Khyber Pakhtunkhwa.
21. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
22. PS to Finance Secretary.
23. PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department.
24. All Section Officers/Budget Officers in Finance Department.
25. Abbas Khan President of Khyber Pakhtunkhwa Civil Secretariat Superintendent, Assistant, Clerks Association with reference to his application No. PR/KPS/SACA/2-1/2013 dated 8-01-2014

(SHAUKAT ULLAH)  
SECTION OFFICER (FR)

CTC  
Certified to be  
True Copy


**Affidavit**

I, Mr Tasawar Khan R/O Haripur do hereby declare, and affirm on oath that the contents of accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' ble Service tribunal.



Deponent

Attested  
FIDA MOHAMMAD BANGASH  
Advocate  
Notary Public  
Date 4.7.18  
Distt. Court Peshawar



## بعدالت



2 مخاب  
بنام

سورخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی و جواب وہی وکل کاروائی متعلقہ

آن مقام کیلئے

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 ثالتہ فیصلہ برحلف دیئے جواب وہی اور اقبال دعویٰ اور  
لاسورت ڈگری کرنے اجراء اور صولی چیک دروپہ ار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یکطرفہ یا اپیل کی براندگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیردی کرنے کا اختیار 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 باختیارات حاصل ہوں گے اور اس کا ساختہ

پرداخت منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے لئے سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر و تو وکیل صاحب پابند ہوں گے۔ کہ پیردی کے لئے  
مذکور کریں۔ لہذا ادکالت نامہ گنہدیا کہ سند رہے۔

*(Handwritten signature and date)*  
20

المرقوم

واہ السی

کے لئے منظور ہے۔

بنام

Tasawar Khan  
Tehsildar