

S.A #. 1205/2018

4th July, 2023

1. Junior to counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.
2. Lawyers are on strike. Case is adjourned to 03.08.2023 for arguments before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar

Mutazem Shah



(Rashida Bano)
Member (J)



(Kalim Arshad Khan)
Chairman

03rd August, 2023

01. Clerk of counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mehtab Khjan, Law Officer for the official respondents present.
02. Former requested for adjournment due to engagement of learned counsel for the appellant before the Hon'ble Peshawar High Court, Peshawar today. Granted. To come up for arguments on 03.11.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

(FAREEHA PAUL)
Member(E)



(RASHIDA BANO)
Member (J)





Fazle Subhan, P.S

09.05.2023

Learned counsel for the appellant present. Mr. Mehtab Khan, Law Officer alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents present.

Learned counsel for the appellant requested for adjournment on the ground that as the brief of the appeal was misplaced, therefore, he has not made preparation. Adjourned. To come up for arguments on 30.05.2023 before D.B. Parcha Peshi given to the parties.


(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)


Kamranullah

30.05.2023

Appellant in person present. Mr. Mehtab Gul, Law Officer alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 04.07.2023 before the D.B. Parcha Peshi given to the parties.


(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

Naeem Amin

4th Nov. 2022

Lawyers are on strike today.

To come up for arguments on 14.12.2022 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

14th Dec. 2022

Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 01.03.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


SCANNED
KPST
Peshawar


(Fareeha Paul)
Member(E)

1st Mar, 2023

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mehtab Gul Law Officer for respondents present.

Counsel are on strike. The case is adjourned. To come up for arguments on 09.05.2023 before D.B. PP given to the parties.


(Rozina Rehman)
Member (J)



(Kalim Arshad Khan)
Chairman

SCANNED
KPST
Peshawar

07.04.2022

Mr. Adnan Aman, Advocate for appellant present and submitted fresh Wakalatnama which is placed on file. Mr. Kabirullah Khattak, Addl. AG alongwith Mehtab Khan Law Officer for the respondents present.

Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 09.06.2022 before the D.B.



(Mian Muhammad)
Member(E)



Chairman.

09.06.2022

Appellant in person present. Mr. Furqan Ahmad, Junior Clerk alongwith Mr. Muhammad Adeel Butt, Additional Advocate Genera for official respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today due to strike of lawyers. Adjourned. To come up for arguments on 30.08.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

30.08.2022

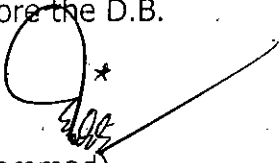
Bench is incomplete, therefore, case is adjourned to 04.11.2022 for the same as before.


Reader

05.10.2021

Mr. Munirud Din Lodhi, Associate of the learned counsel for the appellant and Mr. Muhammad Rasheed DDA, alongwith Shahid Iqbal, Litigation Assistant and Jamshed Akhtar, Legal Officer for the official respondents and counsel for private respondent No. 6 & 7 present.

D
Due to non-availability of learned counsel for the appellant request has been made for adjournment. Request is accorded. Case to come up for arguments on 04.01.2022 before the D.B.


(Mian Muhammad)
Member(Executive)


Chairman

04.01.2022

Appellant in person, Mr. Asif Masood Ali Shah, DDA alongwith Dr. Noor Badshah, V.O for official respondents and counsel for private respondents present.

Appellant seeks adjournment as his counsel is not available

05.04.2022

today. He is directed to make available his learned counsel on Mr. Adnan Aman, Advocate for appellant present and the next date positively. To come up for arguments on submitted fresh Wakalatnama which is placed on file. Mr. Kabirullah Khattak, Addl. AG alongwith Mehtab Khan Law Officer for the respondents present.


(Atiq-ur-Rehman Wazir)


Chairman

Learned counsel for the appellant seeks adjournment.

Adjourned. To come up for arguments on 09.06.2022 before the D.B.

(Mian Muhammad)
Member(E)

Chairman

11.12.2020

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General alongwith representatives of the department Mr. Mehtab Gul, Law Officer and Mr. Jamshaid, for the official respondents are also present.

Due to COVID-19, the case is adjourned to 05.03.2021 before D.B.


READER

04.03.2021


Due to COVID-19, the case is adjourned for the same on 10.06.2021 before D.B

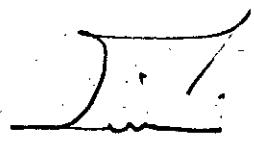

READER

10.06.2021

Mr. Naveed Akhtar, Advocate, for the appellant present. Mr. Hamid Saleem, Law Officer alongwith Mr. Muhammad Rasheed, Deputy District Attorney for official respondents present. Mr. Arbab Saif-ul-Kamal, Advocate, for private respondents No. 6 & 7 present.

Learned counsel for the appellant requested for adjournment being not prepared for arguments today. Adjourned. To come up for arguments before the D.B on 05.10.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

21-5 .2020

Due to COVID19, the case is adjourned to

13/8/2020 for the same as before.

Reader

13.08.2020

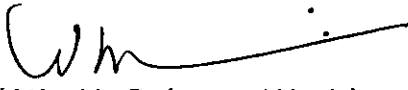
Due to summer vacations case to come up for the same on
16.10.2020 before D.B.

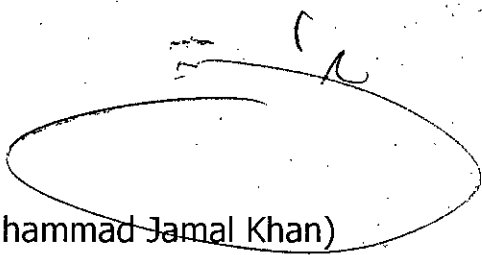
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16.10.2020

Junior counsel for appellant present. Mr. Riaz
Paindakhel learned Assistant Advocate General for
respondents present.

Former requests for adjournment as senior counsel
for appellant is busy before Hon'ble Peshawar High
Court. Adjourned. To come up for arguments on
11.12.2020 before D.B.


(Atiq-Ur-Rehman Wazir)
Member


(Muhammad Jamal Khan)
Member

03.02.2020


Learned counsel for the appellant present. Mr. Ziaullah, DDA for official respondents and private respondents no. 6 and 7 present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 19.03.2020 before D.B.


Member


Member

19.03.2020

None for the appellant present. Addl: AG for respondents present. Due to general strike on the call of Peshawar Bar Council, the case is adjourned. To come up for arguments on 21.05.2020 before D.B.


(MAIN MUHAMMAD)
MEMBER


(M.AMIN KHAN KUNDI)
MEMBER

26.09.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Kifayatullah, Assistant for official respondents and counsel for private respondents No. 6 & 7 present. Learned counsel for the appellant requested for adjournment. Adjourned to 29.10.2019 for arguments before D.B.


(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

29.10.2019

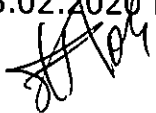
Clerk to counsel for the appellant present. Mr. Usman Ghani, District Attorney for official respondents and private respondent no.6 in person present. Clerk to counsel for the appellant seeks adjournment due to general strike of the bar. Adjourned. Case to come up for arguments on 05.12.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

04.12.2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney for the official respondents and junior to counsel for the private respondents present. Junior to counsel for the private respondents seeks adjournment as senior counsel for the private respondents is not available today. Adjourned. To come up for arguments on 3.02.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

20.06.2019

Appellant in person, Mr. Kabirullah Khattak, Additional AG for official respondents and counsel for private respondents No. 6 & 7 present. Written reply on behalf of official respondents No. 1 to 3 has already been submitted. Learned counsel for private respondents No. 6 & 7 submitted written reply today. None present on behalf of respondents No. 4 & 5 therefore, notice be issued to them to submit written reply on the next date by way of last chance. Case to come up for written reply/comments on behalf of respondents No. 4 & 5 on 05.08.2019 before S.B.


(Muhammad Amin Khan Kundi)
Member

05.08.2019

Nemo for appellant. Mr. Muhammad Jan, DDA for official respondents no. 1 to 5 and counsel for private respondents No. 6 and 7 present.


On the last date of hearing, the respondents No. 4 and 5 were allowed last chance for submission of written reply, today which they failed to.

To come up for arguments on 26.09.2019 before D.B.


Chairman

01.04.2019

Mr. Naveed Taimur, Advocate present and submitted wakalat nama on behalf of the appellant. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Jamshaid Akhtar, Legal Officer for official respondents present. Mr. Saad Ullah Marwat, Advocate present and submitted Wakalat Nama on behalf of private respondents no. 6 and 7. Written reply not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 02.05.2019 before S.B.


(Ahmad Hassan)
Member

02.05.2019

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Jamshed Akhtar, Legal Officer for respondents No. 1 to 3 and counsel for private respondents No. 6 and 7 present.

Parawise comments on behalf of respondents No. 1 to 3 submitted which are placed on record. Learned counsel for private respondents No. 6 and 7 requests for adjournment. Fresh notice be issued to respondents No. 4 and 5. To come up for written reply of respondents No. 4 to 7 on 20.06.2019, before S.B.


Chairman




18.02.2019

Learned counsel for the appellant present.

Contends inter-alia that the appellant was appointed through Public Service Commission under Advertisement No. 3/2017. Under the same advertisement the private respondents No. 6&7 were also appointed but on different date later to the date of appointment of appellant. The requisite qualification criteria of said respondent were also different. The appellant and private respondents underwent separate interviews. Initially, the inter-se seniority list issued by Public service Commission and ensuing appointment reflected the appellant to be at serial No. 1. It was further contended that on 27.03.2010 the respondent No.4 issued another inter-se seniority list wherein the name of the appellant was shown at serial No. 4. A further list was issued on 02.11.2010 whereby the appellant was pushed down to serial No. 6. He is of the view that the resettling of inter-se seniority of appellant was in violation to law as he was appointed three (03) months prior to the other veterinary officers i.e. sheep development officer, instructor & agrostologist.

The points raised warrant admission of instant appeal for regular hearing. Admit. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 01.04.2019 before S.B.


Appellant Deposited
Security & Process Fee


Chairman

01.01.2019

Counsel for the appellant Dr. Muhammad Zafar present. The case was fixed for preliminary arguments but today learned counsel for the appellant submitted application for impleadment of Khyber Pakhtunkhwa Public Service Commission through its Chairman, Dr. Abbas Ali S/O Munawar Khan, Veterinary Officer (BPS-17) Civil Veterinary Hospital Peshawar and Dr. Inam Ullah S/O Saad Ullah Khan, Assistant Director, Livestock District Kurram. The application is placed on record. Since the appeal is in initial stage therefore, the application is accepted and the Muharrar is directed to make entry of the above mentioned respondent in the panel of respondents. Learned counsel for the appellant is directed to furnish copy of the appeal of the impleadment of the aforesaid respondent. In the meanwhile learned counsel for the appellant has also submitted another application for placing some additional documents. The same are also placed on record. To come up for preliminary hearing on 18.02.2019 before S.B.


Muhammad Amin Khan Kundi
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1205/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/10/2018	<p>The appeal of Dr. Muhammad Zafar resubmitted today by Mr. Arifullah Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 01/10/18</p>
2-	2-10-18	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13-11-2018</u></p> <p style="text-align: right;"><i>M N</i> MEMBER</p> <p><i>Due to Retirement of Honorable Chairman the Tribunal is non functional therefore the case is adjourned to come up for the Bench on 1-1-2019</i></p> <p style="text-align: right;"><i>[Signature]</i> Reader</p>

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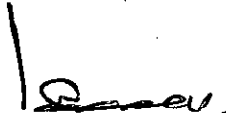
13-11-2018

The appeal of Dr. Muhammad Zafar Veterinary Officer (H) received today i.e. on 27.09.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of Seniority list dated 20.02.2009 mentioned in para-3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of impugned seniority list and departmental appeal against it are not attached with the appeal which may be placed on it.
- 3- Annexures of the appeal may be attested.

No. 1947/S.T.

Dt. 28-9/2018.

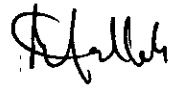

REGISTRAR 28/9/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Arifullah Adv. Pesh.

Sir,

- 1) Seniority list dt 20.2.2009 is already attached at annex: B P-17
- 2) Impugned Seniority list is already attached at annex: D P-21 while departmental appeal is at page-23.
- 3) All annexures are attested.

Re-submitted for placing it before
the Hon'ble Tribunal. Plz.


Arifullah
1-10-2018.

BEFORE THE LEARNED
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018

Dr. Mohammad Zafar

_____ (Appellants)

V E R S U S

Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar and others

_____ (Respondents)

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S. No.	Documents	Annex:	Page No.
1	Memo of appeal		1-7
2	Affidavit		8
3	Copy of advertisement	A	9-16
4	Copy of seniority list dated 20.02.2009	B	17
5	Copy of 2 nd Seniority List	C	18-20
6	Copy of third inter-se-seniority list	D	21
7	Copies of letters	E-F	22-24
8	Copies of letters	G-H-I-J	25-28
9	Copy of advertisement and seniority list	K-L	
10	Wakalat Nama		

Appellant

Through

Arif Ullah
Muhammad Zia Ullah
Advocates High Court,
Peshawar

Dated:

BEFORE THE LEARNED
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018

Dr. Mohammad Zafar, Veterinary Officer (H) Director General
(Extension) Livestock and Dairy Development, KPK Peshawar

_____ (Appellant)

V E R S U S

- 1) Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar
- 2) Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar Agricultural,
Livestock, Fisheries and Cooperative Department, Peshawar
- 3) Director General (Extension Live Stock and Dairy Development
Department) KPK, Peshawar
- 4) Director, Khyber Pakhtunkhwa Public Service Commission

_____ (Respondents)

**Service Appeal Under Section 04 of the Service
Tribunal Act, whereby the combined inter-se-
seniority of veterinary officers, instructors, sheep
development inspector and agrostologist issued on
02.11.2010 has been kept intact vide Letter No.
PSC/SR-1/09984 dated 05.04.2018 issued by the
respondent No. 4 is illegal by all aspect and require
to rectified.**

Prayer:

On acceptance of this appeal, the impugned inter-se-seniority list issued by the Public Service Commission dated 02.11.2010 is require to be rectified as in accordance with seniority list of the veterinary officers (health) dated 27.03.2010, because the appointments of the veterinary officers (H) has 3 months earlier having different qualification for each post made from the officers at Serial No. 7, 8 and 9 in the advertisement No. 7, 8 and 9 issued by Public Service Commission.

Respectfully Sheweth,

- 1) That the appellant appointment was made through Public Service Commission as Veterinary Officer (Health), through advertisement No. 3/2017, whereby several other posts were also advertised such as Sheep Development Instructor at Serial No. 7, agrostologist at Serial No. 8, Instructor at Serial No. 9, Veterinary Officer (research) and Veterinary Officer (Health) at Serial No. 10. It is pertinent to mentioned that required qualification criteria for all posts were different. (Copy of advertisement as Annexure A)
- 2) That after going through the selection process and interviews recommendation for the posts of the Veterinary Officer (Health) at Serial No. 10 were made

earlier than other posts at Serial No. 7, 8 & 9 respectively whose appointments were made after 3 months then the appellant.

- 3) That as the Veterinary Officers (Health) appointment was made earlier through a separate interview, therefore the inter-se-seniority list was issued by Public Service Commission KPK dated 20.02.2009. The appointments which were made by the competent authorities through the recommendation of the Public Service Commission are as follow:

S#	Name of the officer	No. & Date of Recommendations by the KP, PSC	No. & Date of Appointment orders
1	Muhammad Zafar	Letter No: 1182 dated 14.02.2007 (Anex-3)	No: SO(L&DD) AD-E-1 (141)/2008/KC dated 8 th April, 2008 (Annex-5)
2	Dr Abbas Ali	Letter NO: SRA/14667 dated: 19.03.2008, SRA/14666 dated: 19.03.2008, SRA/14754 dated: 20.03.2008 (Annex-4)	No: SO(L&DD) AD-E-1 (141)/2008/KC dated 3 rd June, 2008 (Annex-6)
3	Dr. Inamullah Khan		

It is pertinent to mention there that other candidates i.e. sheep development officer, instructor & agrostologist have not cleared the interview for the post of veterinary officer. (The seniority list dated 20.02.2009 is attached as Annexure B)

- 4) That on 27.03.2010 the respondent No. 4 issued inter-se-seniority list whereby the appellant was placed at Serial No. 4. (Copy of 2nd seniority list is attached as Annexure C)
- 5) That again the respondent No. 4 i.e. Public Service Commission issued third inter-se-seniority list on 02.11.2010 whereby the appellant was placed at Serial No.

6. It is also mention here that other Officers Instructor Agrostologist, Sheep Development Inspector whom appointments were made after three months letter were placed at the top of the seniority list. (Copy of third inter-se-seniority list is attached as Annexure D)

- 6) That appellant approached to the respondent No. 4 for provision of information under Right to Information Act 2013 whereby in response the appellant was informed that through Registered Letter No. PSC/SR-I/014914 dated 13.04.2016 that commission issued / sent a single seniority list of Veterinary Officer (Health) as per their record on 27.03.2010, whereby appellant was placed at merit order Serial No. 4. (Copies of letters are attached as Annexure E and F respectively)
- 7) That after receipt of reply of the respondent No. 4 the appellant approached to his parent department of rectification in the seniority list whereby it was crystal cleared that appellant position in the inter-se-seniority list is at Serial No. 4 where upon several correspondence were made with the respondents in that regard. (Copies of letters are attached as Annexure G, H and I respectively)
- 8) That again the Public Service Commission issued a letter No. PSC/SR-II/09984 dated 05.04.2018 whereby it was stated that combined inter-se-seniority of Veterinary Officer, Instructor, Sheep Development Inspector and Agrostoglogist issued on 02.11.2010 is intact. (Copy of letter dated 05.04.2018 is attached as Annexure J)

- 9) That feeling aggrieved of the order / letter dated 05.04.2018 and combined seniority list dated 02.11.2010, the appellant approach this hon'ble tribunal inter-alia on the following amongst other grounds:

GROUNDS

- a) That appellant appointment was made three months earlier than other Veterinary Officers i.e. Sheep Development Officer, Instructor and Agrostologist, it is therefore, required that appellant be placed senior then the other officers.
- b) That earlier the respondent No. 4 i.e. Public Service Commission issued to different inter-se-seniority lists of veterinary officers vide Notification No. NWFP/PSC-SR-VI/121137 dated 29.02.2009 and Notification No. NWFP-PSC-SR-VI/15272 dated 27.03.2010 wherein appellant was placed at Serial No. 4.
- c) That astonishingly third inter-se-seniority list was issued by respondent No. 4 Public Service Commission bearing No. 52914 dated 02.11.2010 wherein appellant was placed at Serial No. 6 while other three officers whose appointments were made in 03.06.2008 having less services than appellant was shown at the top position which is not according to the relevant law and rules.
- d) That interviews / recommendations by the respondent No. 4 KPK Public Service commission, Peshawar for the post of

Veterinary Officers (Health) were held earlier than that of sheep development officer, instructor and Agrostologist.

- e) That if the posts advertised in the Advertisement No. 3/2007 have been perused at Serial Nos. 7, 8, 9 & 10 then it would be very much crystal cleared all the posts criteria are totally different, their qualifications are different, their nomenclature are different, therefore have no links with each other.
- f) That astonishingly earlier vide Letter No. PSC/SR-II/014914 dated 13.04.2016 the respondent No. 4 cleared the fact that single seniority list has been forwarded to the department on 27.03.2010 where the appellant has been shown at merit order No. 4. It was further clarified that seniority list has been conveyed to the department according to appointment, promotion, transfer rules and esta code while no violation has been made in that regard. It is surprising that again the respondent No. 4 sent a letter No. PSC/SR-1/09984 dated 05.04.2018 whereby it was stated that combined inter-se-seniority of Veterinary Officer, Instructor, Sheep Development Inspector and Agrostologist issued on 02.11.2010 (appellant was placed at Serial No. 6) is intact. The dual statement of the respondent No. 4 also create a doubt which is against the seniority rules envisaged in the establishment code KPK.(Revised Edition) 2011 as well as service rules.
- g) That pathoral of judgments of the apex courts as well as decisions of the hon'ble tribunal favours the appellant which will be submitted at the time of arguments.

h) That earlier the advertisement No. 01/2014 Veterinary Officer (Health) and Post of the Search Officer (Research Wing) were advertised and after their selection the separate seniority list were made which was just according to law hence the same procedure is require to be made in the instant case, as earlier the precedent is available. (Copy of advertisement and seniority list is attached as K & L respectively)

It is, therefore, most humbly stated that on acceptance of this appeal, the impugned inter-se-seniority list issued by the Public Service Commission dated 02.11.2010 is require to be rectified as in accordance with seniority list of the veterinary officers (health) dated 27.03.2010, because the appointments of the veterinary officers (H) has 3 months earlier having different qualification for each post made from the officers at Serial No. 7, 8 and 9 in the advertisement No. 7, 8 and 9 issued by Public Service Commission.

Appellant

Through

Arif Ullah

Muhammad Zia Ullah

Advocates High Court,

Peshawar

Dated:

NWFP PUBLIC SERVICE COMMISSION
Scouts Building, Sector P-I, Phase-IV,
Hayatabad, Peshawar
Website: www.nwfppsc.gov.pk

Dated: 25-07-2007

ADVERTISEMENT NO. 03/2007.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 25-08-2007 (10-09-2007 for candidates from abroad). **Incomplete applications shall be rejected without intimation to the candidates. Moreover, applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.**

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No.1) 02 Senor Research Officer Plant Pathology.

QUALIFICATION: (a) Ph.D in any of the subjects relating to the groups specified in sch: II & (b) Publication of at least two research papers on problems encountered in **OR** Relevant to the conditions in NWFP, and of such a quality which have been used as reference by other research scientists of National and international repute.

AGE LIMIT: 25 to 35 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No.2) 01 Senor Research Officer Vegetable.

QUALIFICATION: (a) Ph.D in any of the subjects relating to the groups specified in sch: II & (b) Publication of at least two research papers on problems encountered in **OR** Relevant to the conditions in NWFP, and of such a quality which have been used as reference by other research scientists of National and international repute.

AGE LIMIT: 25 to 35 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No.3) 01 Senor Research Officer Horticulture .

QUALIFICATION: (a) Ph.D in any of the subjects relating to the groups specified in sch: II & (b) Publication of at least two research papers on problems encountered in **OR** Relevant to the conditions in NWFP, and of such a quality which have been used as reference by other research scientists of National and international repute.

AGE LIMIT: 25 to 35 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No.4) 02 Senor Research Officer in Cereal /Sugar Crops.

QUALIFICATION: (a) Ph.D in any of the subjects relating to the groups specified in sch: II & (b) Publication of at least two research papers on problems encountered in **OR** Relevant to the conditions in NWFP, and of such a quality which have been used as reference by other research scientists of National and international repute.

AGE LIMIT: 25 to 35 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No.5) 02 Senor Research Officer Chemistry.

QUALIFICATION: (a) Ph.D in any of the subjects relating to the groups specified in sch: II & (b) Publication of at least two research papers on problems encountered in **OR** Relevant to the

(S.No.6) 03 Research Officers Miscellaneous.

QUALIFICATION: (i) M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained after "4" Years instructions after F.Sc) from a recognized University Under Research programme in the subject relating to the subject group as specified in schedule -II attached with the Service Rules to which the Vacancies occurred.

AGE LIMIT: 21 to 32 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

ALLOCATION: one each to Merit, Zone-1 and Zone-2.

(S.No.7) 01 Sheep Development Inspector in L& DD Deptt:

QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc OR Doctor of Veterinary Medicine from a recognized University and (ii) Registration with Pakistan Veterinary Medical Council is must.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

ALLOCATION: Merit.

(S.No.8) 01 Agrostologist in L& DD Deptt:

QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc OR Doctor of Veterinary Medicine from a recognized University and (ii) Registered with Pakistan Veterinary Medical Council.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No.9) 02 Instructors in L& DD Deptt:

QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc, or Doctor of Veterinary Medicine from a recognized University and (ii) Registered with Pakistan Veterinary Medical Council.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

ALLOCATION: one each to Merit and Zone-1.

(S.No.10) 02 Veterinary Officers (Research) & 20 Officers (Health)

QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from a recognized University.

Registration with Pakistan Veterinary Medical Council (PVMC)

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

ALLOCATION: one each to Merit and Zone-3 (for Research)
5 to Merit 4 to Zone-3, 3 each to Zone-1,2,4 and 2 to Zone-5 (for Health)

(S.No.11) 24 Male Agriculture Officers.

QUALIFICATION: M.Sc Agriculture or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: 06 to Merit, 04 each to Zone-1, 2,3 and 03 each to Zone- 4 and 5.

(S.No.12) 01 Post of Junior Scale Stenographer.

QUALIFICATION: (a) Intermediate or equivalent qualification from a recognized Board and (b) A speed of 60 words per minute in English Shorthand and 35 words per minute in English Typewriting and knowledge of Computer in using MS Word and MS Excel.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-12. **ELIGIBILITY:** Both Sexes.

ALLOCATION: Zone-1.

BOARD OF REVENUE (REVENUE & ESTATE DEPARTMENT.)

ANNEX-

CONFIDENTIAL

N.W.F.P. PUBLIC SERVICE COMMISSION
Fort Road, Peshawar Cantt. (Near Governor House)
P.N. No. 92/3563



No. NWFP-PSC-SR-VI. 1115

Dated: 29.2.2009

The Secretary to Govt of NWFP.,
Agriculture Livestock & Cooperative Department.

Rectt: of 20 Posts of Veterinary Officer(Health)(B-17) in L&DD

Dear Sir

In continuation to our letter No. NWFP-PSC-SR-VI/0060 dated 13.2.2009 on the subject noted above and to state that the Commission recommends Mr Muhammad Bilal S/O Qabi Shah of District Mardan/2 to the Government for appointment for the subject cited posts.

Recommendation in favour of the recommendee is provisional subject to his

Medical fitness.

The case has been finalized and Inter-se-Merit / Zonal Allocation of the recommendees is enclosed as Annex - 'A'.

Original application (with enclosures) of the above recommendee is sent herewith for your record. Please acknowledge receipt.

Yours Faithfully

(SIRAJ-UD-DIN)

DEPUTY SECRETARY-III

18/21

GOVERNMENT OF NWFP,
AGRICULTURE, LIVESTOCK & COOPERATION
DEPARTMENT PESHAWAR

No. SO(L&DD)AD-E-1(141)2003.
Dated Peshawar the January 17, 2008.

To
The Medical Superintendent,
Police and Services Hospital,
Peshawar.

Subject: STANDING MEDICAL BOARD

I am directed to refer to the subject noted and to state that the NWFP Public Service Commission, Peshawar letter No. 1182 dated 14/12/2007 (copy enclosed) has recommended the following candidates for appointment as Veterinary Officer (Health) BS-17 in the Livestock & Dairy Development Department:-

S.No	Name and addresses of the PSC recommendees
1.	Mr Akbar Ali S/O Mr. Mutabar Khan Village, Safari P/O Timergara Tehsil Balamabat District Dir (Lower)
2.	Mr Haq Amanullah S/O Mr. Akhtar Ali Khan Village & P/O Paloski Tehsil Takhte Nasrati, District Karak
3.	Mr Muhammad Ubaidullah Qureshi S/O Mr. Muhammad Jamalullah Qureshi, Village & P/O Totalai Mohalla Qazi/Abad District Buner Via Sawabi
4.	Mr Muhammad Zafir S/O Muhammad Naseem, Kotka Abdul Qadir Shah Mandan P/O Baga Mir Abbas Khan Tehsil & District Bannu
5.	Mr Muhammad Tufail S/O Mr. Muhammad Bashir House No. 845, Sector P/4, Street No. 35 Phase No 1, Hayatabad, Peshawar
6.	Mr Hasham Khan S/O Dr. Ijaz Ahmad Village & P/O Mirpur, Tehsil & District Haripur
7.	Mr Rahit Ali S/O Mr. Daulat Maud Village & P/O Fatehpur Tehsil & District Swat
8.	Mr Saeed Khan S/O Mr. Abdur Rahman Village & P/O Jalal, Tehsil Takht Bhai District Mardan
9.	Mr Zaid Rahman S/O Shamsur Rahman Village & P/O Totalai Mohalla Jaffar Khan District Buner
10.	Mr Muhammad Ilyas Afridi S/O Mr. Shari Muhammad Afridi Mohalla Shara Khel Kohi Hassan Khel F R Peshawar
11.	Mr Aziz Ahmad S/O Mr. Attaullah Village & P/O Kokarai, Tehsil Saidu Sharif District Swat
12.	Mr Aniq Rahman S/O Mr. Haji Habib ur Rahman Village & P/O Ghoriwala Tehsil & District Bannu

It is therefore requested to kindly arrange Standing Medical Board for medical examination of the above recommendees. Fix the date and time for medical examination and inform this Department for intimation to recommendees in time.

Encl: As Above.

Your's Faithfully,

(NAFEMULLAH)

Section Officer (L&DD)

Encl. No. & Date even.

Copy forwarded to:-

1. The Director, Livestock & Dairy Development, NWFP Peshawar, in continuation to this department even number dated 26.12.2007 for information and further necessary action, please.

2. Deputy Secretary III, NWFP Public Service Commission, Scouts Building, Phase-2, Near Police Station Hayatabad, Peshawar with respect to his above referred letter for information Please.

3-14 Recommendees concerned.

15-18 PS to Secretary Agriculture.

Section Officer (L&DD)

GOVERNMENT OF NWFP,
AGRICULTURE, LIVESTOCK & COOPERATION
DEPARTMENT PESHAWAR

No.SO(L&DD)AD-E-1(141)2003
Dated Peshawar the March 26, 2008

P-12

To
The Medical Superintendent,
Police and Services Hospital,
Peshawar.

Subject: STANDING MEDICAL BOARD

I am directed to refer to the subject noted above and to state that the NWFP Public Service Commission, Peshawar vide letters No.SRA/14667 dated 19/03/2008, SRA/14666 dated 19/03/2008, and SRA/14754 dated 20/03/2008 (copies enclosed) has recommended the following candidates for appointment on the posts mentioned against their names in the Livestock & Dairy Development Department NWFP:-

S.No	Name and addresses of the PSC recommendees	Recommended for the post of
1.	Mr.Siraj-Ud-Din S/O Mohammad Younas C/O Younas Medicine company Khar Bjaur Agency.	Instructor (BS-17)
2.	Abbas Ali S/O Munawar Khan Village Banda Nabi P/O Dagi Banda, District and Tehsil Nowshera.	Instructor (BS-17)
3.	Mr.Inamullah Khan S/O Saadullah Khan, Tehsil & District Charsadda, Village Dagi Mukaram Khan, Post Office Tarnab.	Sheep Development Inspector (BS-17)
4.	Mr.Sahib Zada Shafiullah S/O Sahib Zada Nasarullah Village Landi Akhun Ahmad U.C Pushtakhara Tehsil/ District Peshawar.	Agrostologist (BS-17)

It is therefore requested to kindly arrange Standing Medical Board for determining the medical fitness of the above recommendees of Public Service Commission.

Encl: As Above.

Your's Faithfull

(NAEEMULLAJ)
Section Officer (L&D)

Endst. No. & Date even.

Copy forwarded to:

- 1 The Director, Livestock & Dairy Development, NWFP Peshawar information and further necessary action please.
- 2 Deputy Secretary III, NWFP Public Service Commission, Scouts Bldg Phase-IV, Near Police Station, Hayatabad, Peshawar w/r to his above ref letter, for information Please.
- 3-6. Recommendees concerned:

Section Officer (L&D)

GOVERNMENT OF PESHAWAR
AGRICULTURE, LIVESTOCK & COOPERATION
DEPARTMENT PESHAWAR

Dated Peshawar the April 8, 2008

NOTIFICATION

No.SO(L&DD)A-E-1(141)/2008/KC.

Consequent upon recommendation of the NWFP Public Service Commission, the competent authority is pleased to appoint the following as Veterinary Officer (Health) in BS-17 (Rs.8210-615-20510 plus usual allowances as admissible under the rules) on regular basis with immediate effect under the provision of Government of NWFP Establishment & Administration Department circular bearing No.SOR-6(E&AD)13-1/2005 dated 10.8.2005:-

1. Dr. Akbar Ali S/O Mr.Mutabar Khan Village, Safari P/O Timergara Tehsil Balanabat District Dir (Lower).
2. Dr. Haq Amanullah S/O Mr.Akhtar Ali Khan Village & P/O Paloski Tehsil Takhte Nasrati, District Karak
3. Dr. Muhammad Ubaidullah Qureshi S/O Mr.Muhammad Jannatullah Qureshi, Village & P/O Totalai, Mohalla Qazi Abul District Buner Via Sawabi
- ✓ 4. Dr. Muhammad Zafar S/O Muhammad Naseem, Kotka Abdul Qadir Shah Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu
- ✓ 5. Dr. Muhammad Tufail S/O Mr. Muhammad Bashir House No.845, Sector D/A, Street No.35 Phase No.1, Hayatabad, Peshawar
6. Dr. Hasham Khan S/O Dr. Ijaz Ahmad Village & P/O Mirpur, Tehsil & District Haripur
7. Dr. Rahit Ali S/O Mr.Daulat Mand Village & P/O Fatehpur Tehsil & District, Swat
8. Dr. Saced Khan S/O Mr.Abdur Rahman Village & P/O Jalala, Tehsil Takht Bhai District Mardan
9. Dr. Zia Ur Rahman S/O Shamsur Rahman Village & P/O Totalai Mohalla Jaffar Khan District Buner
10. Dr. Muhammad Hayas Afridi S/O Mr.Shaad Muhammad Afridi Mohalla Sharat Khel Kohi Hassan, Khel F R Peshawar
11. Dr. Aziz Ahmad S/O Mr.Ataullah Village & P/O Kokarai, Tehsil Saidu Sharif District Swat
12. Dr. Attiq Rahman S/O Mr.Haji Habib ur Rahman Village & P/O Ghoriwala Tehsil & District Bannu

2. On their appointment, they are hereby posted/adjusted on the following posts mentioned against their names, subject to the terms & conditions given below.

Sl.No.	Name of Officer	Place of posting	Remarks
1.	Dr. Akbar Ali	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Khal District Dir Lower	Against vacant post.
2.	Dr. Haq Amanulla	Veterinary Officer (H) In-charge Civil Veterinary Hospital Latambar District Karak	--do--
3.	Dr. Muhammad Ubaid Ullah Qureshi	Veterinary Officer (H) In-charge Civil Veterinary Hospital Topi District Swabi	--do--
4.	Dr. Muhammad Zafar	Veterinary Officer (H) In-charge Civil Veterinary Hospital Nahaqi District Peshawar	--do--

5.	Dr. Muhammad Tufail	Additional Veterinary Officer Civil Veterinary Hospital Peshawar	Against vacant post
6.	Dr. Hashim Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Baffa District Manshera	--do--
7.	Dr. Rahat Ali	Veterinary Officer (Health) In-charge Artificial Insemination Center Baidu Sharif Swat	--do--
8.	Dr. Saeed Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dheri Jalagram, Malakand Agency	--do--
9.	Dr. Zia-Ur-Rahman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Udhder Chowk District Swabi	--do--
10.	Dr. Aziz Ahmad	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Pusan District Shangla	--do--
11.	Dr. Atiq-ur-Rehman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Titer Khel District Lakki Marwat	--do--
12.	Dr. Muhammad Ilyal Afridi	His services are placed at the disposal of Civil-Secretariat PATA.	The officer may further be adjusted against vacant post of Veterinary Officer (Health) in the Livestock and Dairy Development Department PATA

TERMS AND CONDITIONS:

- i. Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to contributory Provident Fund in such a manner and at such rates as may be prescribed by the Government.
- ii. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice, their two month's pay/allowances shall be forfeited to Government.
- iii. The appointee should join their post within 30-days of the issue of this notification. The Director Livestock and Dairy Development NWFP would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- iv. They will be on probation for a period of two years extendable for another one year.
- v. They will be governed under such rules and regulations as may be issued from time to time by the Government.
- vi. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against the NWFP Removal from Services (Special Powers) Ordinance, 2000 and the Rules framed from time to time.

NOTIFICATION**No.SOR(E&DD)AD-E-1(141)/2008/KC.**

Consequent upon recommendation of the NWFP Public Service Commission, the competent authority is pleased to appoint the following as Veterinary Officers (Health) in the Livestock & Dairy Development Department NWFP in BS-17 (Rs.8210-615-20510 plus usual allowances as admissible under the rules) on regular basis with immediate effect under the provision of Government of NWFP Establishment & Administration Department circular bearing No.SOR-6(E&AD)13-1/2005 dated 10.8.2005:-

1. Mr. Siraj-Ud-Din S/O Mohammad Younas of Younas Medicine company Khac, Bajour Agency.
2. Mr. Abbas Ali S/O Munawar Khan Village Banda Nabi P/O Dagi Banda, District and Tehsil Nowshera.
3. Mr. Inamullah Khan S/O Saadullah Khan, Tehsil & District Charsadda, Village Dagi Mukaram Khan, Post Office Tarnab.
4. Mr. Sahib Zada Shafiullah S/O Sahib Zada Nasirullah Village Landi Akhun Ahmad, U.C Pushtakhara Tehsil/ District Peshawar

2. On their appointment, they are hereby posted/adjusted on the following posts mentioned against their names, subject to the terms & conditions given below:

S.No	Name of officer	Domicile	Place of posting
1.	Mr. Siraj-Ud-Din	Bajour Agency	Service of the officer are placed at the disposal of FATA Secretariat for his further posting against the vacant post of Veterinary Officer (Health) BS-17 in the Livestock & Dairy Development Department FATA
2.	Mr. Abbas Ali	Nowshera	Veterinary Officer (Health) BS-17, In-charge Civil Veterinary Hospital Shagi Bala, District Peshawar
3.	Mr. Inamullah Khan	Charsadda	Services of the officer are placed at the disposal of FATA Secretariat for his further posting against the vacant post of Sheep Development Inspector (BS-17) in Livestock & Dairy Development Department FATA
4.	Mr. Sahibzada Shafiullah	Peshawar	Veterinary Officer (Health) BS-17, In-charge Civil Veterinary Hospital Panam Dheri Tehsil and District Peshawar

TERMS AND CONDITIONS

- a. Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as may be prescribed by the Government.
- b. Their services will be liable to termination on one month's notice from either side. In case of extension...

Dated Peshawar the June 3, 2008

after one month of issue of this Notification, failing which their ~~condition~~
will expire automatically and no subsequent appeal etc shall be entertained.


- d. They will be on probation for a period of two years extendable for another one year.
- e. They will be governed under such rules and regulations as may be issued from time to time by the Government.
- f. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against the NWFP Removal from Services (Special Powers) Ordinance, 2000 and the Rules framed from time to time.
- g. Charge report should be submitted by all concerned.
- h. No TA/DA will be allowed to the appointees for joining their duty.

Sd/-
SECRETARY AGRICULTURE

Endst. No. & Date even.

Copy forwarded to:

1. The Accountant General, NWFP Peshawar.
2. The Accountant General PR Peshawar.
3. Director, Livestock & Dairy Development, NWFP Peshawar w/r to his letter No.5733 dated 03/05/2008.
4. Director Livestock & Dairy Development (FATA) Warsak Road Peshawar.
5. Section Officer (Estt) Civil Secretariat FATA Warsak Road Peshawar.
6. Manager Government Printing Press, NWFP Peshawar.
- 7-11. Officers concerned.
- 12-15. Personal files of officers concerned.
16. P.S to Chief Secretary, NWFP.
17. P.S to Minister Livestock NWFP.
18. P.S to Secretary Agriculture.


(NAEEMULLAH)
Section Officer (L&DD)

Subject: Inter se Merit/Zonal allocation of 20 posts of veterinary officers(health)(Advt.No.3/2007) Annex 'A'

Vacancy Relation	Allocation	Merit Order	Name with Father's name	Domicile/Zone	Adjustment
34/1a	Merit Zone-3	02	Akbar Ali S/O Mutabar Khan	Dir/3	Own quota
3RD BLOCK					
✓	Merit	01	Riaz Amanullah S/O Akhtar Ali Khan	Karak/4	Merit quota ✓
✓	Zone-1	09	Ahmad ur Rehman S/O Mati ur Rehman	NW Agy/1	Own quota
✓	Zone-2	07	Mohammad Bilal S/O Qabil Shah	Mardan/2	Own quota
✓	Zone-3	05	Muhammad Ubaidullah Qureshi S/O Muhammad Jamatullah Qureshi	Bunner/3	Own quota ✓
✓	Merit	04	Muhammad Zafar S/O Muhammad Naseem	Bannu/4	Merit quota ✓
✓	Zone-4	08	Muhammad Tufail S/O Muhammad Bashir	Bannu/4	Own quota
✓	Zone-5	14	Hashim Khan S/O Dr. Jaz Ahmad	Haripur/5	Own quota
✓	Zone-1	13	Fazli Elahi S/O Musharaf Shah	Mohmand Agy/1	Own quota
✓	Merit	06	Rahat Ali S/O Daulat Mand	Swat/3	Merit quota
✓	Zone-2	10	Saeed Khan S/O Abdur Rehman	Mardan/2	Own quota ✓
✓	Zone-3	17	Zia ur Rehman S/O Shams ur Rehman	Bunner/3	Own quota
✓	Zone-4	11	Shahid Zaman S/O Farooq Zaman	Bannu/4	Own quota
✓	Merit	15	Muhammad Hanif Khan S/O Azim Khan	Mohammad Agy/1	Merit quota
✓	Zone-5	11	Suhzab Naveed S/O Aurangzeb Khan	Ahlybottabad/5	Own quota
✓	Zone-1	16	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	FR Peshawar/1	Own quota
✓	Zone-2	18	Muhammad Ismail S/O Nasreem Jan	Nowshera/2	Own quota
✓	Merit	19	Ibadullah Jan S/O Pordil Khan	Charsadda/2	Merit quota
✓	Zone-3	22	Aziz Ahmad S/O Attaullah	Swat/3	Own quota
✓	Zone-4	28	Atiq ur Rehman S/O Haji Habibur Rehman	Bannu/4	Own quota

(Signature)
18/2
(SIRAJ UD DIN)
DY. SECRETARY-III
NWFP PUBLIC SERVICE COMMISSION
Peshawar

REGISTERED

ANNEX - 1

1-10/11

N.W.F.P. PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar Cantt, (Near Governor House)
PH No: 9213563
Fax No: 9211795



No. NWFP-PSC-SR-VII/3/1

Dated: 27/3/14



To,

The Secretary to Govt: of NWFP
Agriculture Livestock & Cooperative Department
Peshawar.

Subject: - INTER-SE-SENIORITY LIST OF VETERINARY OFFICERS
(B-17) IN VARIOUS SUBJECTS.

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith a combined Seniority list of Veterinary Officers (B-17) in various Subjects for your record and necessary action please.

Yours Faithfully,

(SYED ILYAS SHAH)
DEPUTY SECRETARY-III
NWFP PUBLIC SERVICE COMMISSION

Handwritten notes and signatures at the bottom of the page, including the number '3305' and various scribbles.

INTER-SE-SENIORITY LIST OF VETERINARY OFFICERS (B-17) IN VARIOUS SUBJECTS.

ADVT: NO.05/2003 + 07/2003

S.No	Marks Obtained	Date of Birth	Name with Father's Name	Subject	Domicile/Zone
1.	64/42	01.01.79	Syed Zahid Ali Shah S/O Syed Mian Said	Veterinary Officer	Swabi/2
2.	63/36	08.09.69	Ghulam Muhammad S/O Sher Muhammad	Veterinary Officer	Dir/3
3.	62/40	15.03.75	Khalid Khan S/O Muhammad Nazeef Khan	Veterinary Officer	Bannu/4
4.	61/43	08.01.69	Noor Daraz Khan S/O Zar Wali Khan	Veterinary Officer	F.R Bannu/1
5.	61/39	05.06.70	Rafi-Ullah S/O Muhammad Amir	Veterinary Officer	Lakki Marwat/4
6.	61/39	25.12.78	Sher Bahadar Khan S/O Bahadar Khan	Veterinary Officer	Mardan/2
7.	61/38	28.04.72	Umar Ayaz S/O Abbas Khan	Veterinary Officer	N.W Agy/1
8.	61/36	08.09.73	Murad Ali Khan S/O Muntaz Khan	Veterinary Officer	F.R Bannu/1
9.	61/36	01.02.75	Barkat Ali S/O Ali Bakht	Veterinary Officer	Swat/3
10.	60/40	17.03.76	Muhammad Mujtaba S/O Ghulam Sarwar	Veterinary Officer	Lakki Marwat/4
11.	60/40	28.08.79	Muhammad Bilal S/O Muhammad Umer	Veterinary Officer	Orakzai Agy/1.
12.	60/37	10.02.74	Hamayun Khan S/O Sardar Bahadur	Veterinary Officer	Swabi/2
13.	58/36	23.11.78	Muhammad Quid Zaman S/O Muhammad Zaman	Veterinary Officer	Haripur/5

ADVT: NO.03/2006

01.	64/39	02.04.76	Ishtiaq Ahmed S/O Banaras Khan	Veterinary Officer	Abbottabad/5
02.	61/39	11.12.82	Shahid Khan S/O Qadir Ullah	Veterinary Officer	F.R Bannu/1
03.	61/36	14.06.82	Farhan Anwar Khan S/O Muhammad Anwar Khan	Veterinary Officer	Peshawar/2

ADVT: NO.03/2007

1.	67/39	01.06.83	Haq Aman Ullah S/O Akhtar Ali Khan	Veterinary Officer Health	Karak/4
2.	63/42	01.01.76	Akbar Ali S/O Mutabar Khan	Veterinary Officer Health	Dir/3
3.	63/42	16.01.83	Muhammad Shahid S/O Noor Muhammad	Veterinary Officer Research	Moh:Agy/1
4.	63/42	01.12.83	Muhammad Zafar S/O Muhammad Nascem	Veterinary Officer Research	Bannu/4
5.	62/39	15.04.81	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Veterinary Officer Health	Buner/3
6.	60/39	19.08.80	Rahat Ali S/O Daulat Mand	Veterinary Officer Health	Swat/3
7.	60/36	04.05.80	Mohammad Bilal S/O Qabil Shah	Veterinary Officer Health	Mardan/2
8.	59/39	11.03.75	Muhammad Tufail S/O Muhammad Bashir	Veterinary Officer Health	Bannu/4

9.	59/39	08.05.79	Ahmad-Ur-Rehman S/O Mati-Ur-Rehman	Veterinary Officer Health	N.W Agen
10.	59/39	05.07.80	Saeed Khan S/O Abdur Rehman	Veterinary Officer Research	Mardan/2
11.	59/39	19.04.79	Shahid Zaman S/O Farooq Zaman	Veterinary Officer Research	Bannu/4
12.	58/36	04.04.82	Abdul Sajid S/O Abdul Ghani	Veterinary Officer Research	Mkd: Ager
13.	58/36	01.01.78	Fazli Elahi S/O Musharaf Shah	Veterinary Officer Health	Moh: Ager
14.	58/36	05.12.80	Hashim Khan S/O Dr. Ijaz Ahmad	Veterinary Officer Health	Haripur/5
15.	57/39	01.01.81	Muhammad Hanif Khan S/O Azim Khan	Veterinary Officer Research	Moh: Ager
16.	57/39	04.04.81	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	Veterinary Officer Health	F.R Peshaw
17.	57/36	01.04.80	Zia-Ur-Rehman S/O Shams-Ur-Rehman	Veterinary Officer Health	Buner/3
18.	57/36	01.06.80	Muhammad Ismail S/O Nasrem Jan	Veterinary Officer Research	Nowshera/
19.	57/36	04.10.84	Ibadullah Jan S/O Pordal Khan	Veterinary Officer Research	Charsadda/
20.	56/36	01.03.79	Aziz Ahmad S/O Atta Ullah	Veterinary Officer Health	Swat/3
21.	54/36	24.04.77	Attiq-Ur-Rehman S/O Haji Habib-Ur-Rehman	Veterinary Officer Health	Bannu/4
22.	53/36	07.05.79	Shahzad Naveed S/O Aurang Zeb Khan	Veterinary Officer Research	Ahottabac

ADVT. NO.03/2008

1.	67/45	05.04.85	Rajwali Khan S/O Sher Azam Khan	Veterinary Officer Research	Peshawar/2
2.	64/42	16.03.84	Kamran Farid S/O Mashal Khan	Veterinary Officer Research	Peshawar/2
3.	62/39	14.04.78	Din Muhammad S/O Nabi Gul	Veterinary Officer Research	Moh: Ager
4.	61/39	06.10.82	Muhammad Shahid S/O Gulzar Ahmad	Veterinary Officer Research	Manshra/5
5.	59/39	02.02.79	Muhammad Rizwan S/O Sulaiman Khan	Veterinary Officer Research	D.J.Khan/4

(SYED ILYAS SHAH)
DEPUTY SECRETARY-II

INTER-SE SENIORITY LIST OF OFFICERS (B-17) IN LIVESTOCK (EXTENSION WING) (03/2007)

S.No.	Marks	D.O.B	Name With Father's Name	Subject	Domicile
1.	77/47	01.01.84	Abbas Ali S/O Munawar Khan	Instructor ✓	Nowshera/2
2.	71/46	30.08.80	Inam Ullah Khan S/O Saad Ullah Khan	Sheep Devel: ✓ Inspector	Charsadda/2
3.	70/45	21.03.84	Sahibzada Shafti Ullah S/O Sahibzada Nasr Ullah	Agrostologist ✓	Peshawar/2
4.	67/39	01.06.83	Haq Aman Ullah S/O Akhtar Ali Khan	Veterinary Officer Health	Karak/4
5.	63/42	01.01.76	Akbar Ali S/O Mutabar Khan	Veterinary Officer Health	Dir/3
6.	63/42	01.12.83	Muhammad Zafar S/O Muhammad Naseem	Veterinary Officer Health	Bannu/4
7.	63/36	15.12.83	Siraj Ud Din S/O Muhammad Younis	Instructor ✓	Bajaur Agency/1
8.	62/39	15.04.81	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Veterinary Officer Health	Buner/3
9.	60/39	19.08.80	Rahat Ali S/O Daulat Mand	Veterinary Officer Health	Swat/3
10.	60/36	04.05.80	Mohammad Bilal S/O Qabil Shah	Veterinary Officer Health	Mardan/2
11.	59/39	11.03.75	Muhammad Tufail S/O Muhammad Bashir	Veterinary Officer Health	Banaru/4
12.	59/39	19.04.79	Shahid Zaman S/O Farooq Zaman	Veterinary Officer Health	Bannu/4
13.	59/39	08.05.79	Ahmad-Ur-Rehman S/O Mati-Ur-Rehman	Veterinary Officer Health	N.W Agency/1
14.	59/39	05.07.80	Saeed Khan S/O Abdur Rehman	Veterinary Officer Health	Mardan/2
15.	58/36	01.01.78	Fazli Elahi S/O Musharaf Shah	Veterinary Officer Health	Moh: Agency/1
16.	58/36	05.12.80	Hashim Khan S/O Dr. Ijaz Ahmad	Veterinary Officer Health	Haripur/5
17.	57/39	01.01.81	Muhammad Hanif Khan S/O Azim Khan	Veterinary Officer Health	Moh: Agency/1
18.	57/39	04.04.81	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	Veterinary Officer Health	F.R Peshawar/1
19.	57/36	01.04.80	Zia-Ur-Rehman S/O Shams-Ur-Rehman	Veterinary Officer Health	Buner/3
20.	57/36	01.06.80	Muhammad Ismail S/O Nasrem Jan	Veterinary Officer Research	Nowshera/2
21.	57/36	04.10.84	Ibadullah Jan S/O Pordal Khan	Veterinary Officer Health	Charsadda/2
22.	56/36	01.03.79	Aziz Ahmad S/O Atta Ullah	Veterinary Officer Health	Swat/3
23.	54/36	24.04.77	Attiq-Ur-Rehman S/O Haji Habib-Ur-Rehman	Veterinary Officer Health	Bannu/4
24.	53/36	07.05.79	Shahzad Naveed S/O Aurang Zeb Khan	Veterinary Officer Health	Abbottabad/5

(SYED ILYAS SHAH)
DEPUTY SECRETARY-II

Secretary / Public Information Officer,
Khyber Pakhtunkhwa, Public Service Commission,
Peshawar.

Subject: PROVISION OF INFORMATION UNDER THE RIGHT TO INFORMATION ACT 2013

R/ Sir

With due respect it is please stated that I was selected for the post of Veterinary Officer (Health) PBS-17 by the Khyber Pakhtunkhwa Public Service Commission and was recommended to the Government vide recommendation letter No: 51182 dated 14.12.2007 through the advertisement No. 03/2007 against the Post of Veterinary Officer (H) BPS-17 at serial No: 10. Four other posts having separate / different qualification criteria i.e. one each for Sheep Development Officer and Agrostologist and 02 posts of Instructors were also floated in the same advertisement at serial No. 7, 8 and 9 respectively.

Two Inter-Se-Seniority lists were issued by your office vide letters No: NWFP-PSC-SR-VI/1237 dated 29.02.2009 and vide letter No. NWFP-PSC-SR-VI/15272 dated 27.03.2010 wherein, I was placed at merit order No. 04 among the Veterinary Officers.

A third Inter-se-seniority list was issued bearing No: 52914 dated 02.11.2010 wherein, all the different cadres' posts were merged in a combined list i.e. (Veterinary Officer, Agrostologist, Sheep Development Officer and Instructor) and I was placed at merit order No. 06. Which means that all the different cadres posts having different qualification criteria were evaluated collectively

My recommendation to the Government was made on 14.12.2007 through separate interview while recommendations to the other cadre posts mentioned above were made on 20.03.2008 means that they are 3 months junior than me.

Now, therefore, you are requested to provide the following information under the Right to Information Act, 2013:

1. Why the other cadre officers have been merged in same Inter-se-Seniority list, while they have separate qualification criteria and having separate nomenclature.
2. Why they have been placed senior than me while they were recommended for selection to the government three months later.
3. Why three different inter-se-seniority lists have been issued by the commission.
4. Why the rules i.e. Government of Khyber Pakhtunkhwa, Civil Servants Appointment, Promotion and Transfer Rules 1989 and Estacode Khyber Pakhtunkhwa which clearly shows that "A Person appointed by initial recruitment by commission or departmental selection committee, provided that persons selected in an earlier selection shall rank senior to the person selected in later selection) has not been implemented.

(Dr. Muhammad Zafar)

NIC No: 212012258065-1

Mob: 0333-9393647

Address: Directorate General (Extension), Livestock & Dairy Development, Khyber Pakhtunkhwa,
near bacha khan chowk Peshawar.

Email: muhammadzafar83@gmail.com

Dated: 23/02/2016

K-23

To

The Director General (Extension),
Livestock & Dairy Development,
Khyber Pakhtunkhwa, Peshawar

Subject:

**RECTIFICATION OF THE SENIORITY LIST OF BS-17 OFFICERS (ADVERTISEMENT
NO: 03/2007).**

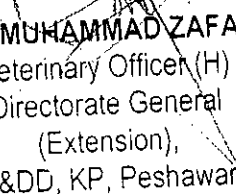
R / Sir

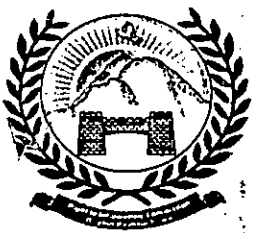
With due respect it is please stated that the matter of three inter-se-seniority lists was raised previously in the department wherein, two Veterinary officers namely Dr. Inamullah Khan and Dr. Abbas Ali were placed two steps senior than me (which have also bypassed 21 other veterinary officers) and produced a inter-se-seniority list in which the Administrative Department was also bypassed (copy attached as Annex-1). In this regard Khyber Pakhtunkhwa Public Service Commission was approached and was requested under Right to Information Act 2013 for solving the issue (Copy of application is attached as Annex-2). Assistant Director-III, Mr. Fazal Qayyum through registered letter bearing No: PSC/SR-II/014914 (copy enclosed as Annex-3) which was also endorsed to me by the Right to Information Commission Khyber Pakhtunkhwa, Peshawar bearing letter No: RTIC/AR/1-1941/16/4048 dated 18th April 2016 (copy enclosed as Annex-4), wherein, it is clearly stated that as per record of the KPPSC, KP the commission sent a single seniority list of veterinary officer (Health) on 27.03.2010 (copy enclosed as Annex-5), wherein, I was placed at merit order No: 4.

In this regard the rest of inter-se-seniority lists have been disowned by the Khyber Pakhtunkhwa, Public Service commission. It is further stated that fresh seniority list which is approved by the competent authority the actual date of appointment of the above named officers have been incorrectly incorporated deliberately to hide the facts.

Keeping in view the above facts, it is, requested that necessary correction in the seniority list of BS-17 officers in light of the Khyber Pakhtunkhwa, PSC, letter may kindly be made, please.

(Encl: A.A)


(DR. MUHAMMAD ZAFAR)
Veterinary Officer (H)
Directorate General
(Extension),
L&DD, KP, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
RIGHT TO INFORMATION COMMISSION
7th Floor, Tasneem Plaza, Near Benevolent Fund Building,
6th Saddar Road, Peshawar
Email: complaints@kprti.gov.pk
Ph: +92-91-9212643
Fax: +92-91-9211163

Annex: 1
P-24

No. RTIC/AR/1-1941/16
Dated: 18th April, 2016

To

Dr. M. Zafar,
Directorate General (Extension) Livestock & Dairy Development KPK,
Near Bacha Khan Chowk, Peshawar.

Ref: DR. M. ZAFAR VS. KPPSC, PESHAWAR.


Sub: **SUPPLY OF INFORMATION UNDER RTI. ACT, 2013**
(COMPLAINT NO. 01941)

Memo:

Enclosed please find the copy of letter received from Khyber Pakhtunkhwa, Public Service Commission, Peshawar bearing No. PSC/SR-II/014915, dated: 13-04-2016, addressed to you. As per contents of that letter, the requisite information has been provided to you by the Department.

You are advised to confirm in writing the receipt of complete and relevant information within seven days of the receipt of this letter.

In case we do not receive any response from you, we will close this case on 29th April, 2016.


Assistant Registrar
Right to Information Commission,
KPK, Peshawar.

Copy to:-

Mr. Fazal Qayyum, Assistant Director-III, Public Service Commission, KPK, Peshawar.

Assistant Registrar
Right to Information Commission,
KPK, Peshawar.

TO

Dr. Muhammad Zafar
Directorate General (Extension) Livestock & Dairy
Development Near Bacha Khan Chowk Peshawar
RIGHT TO INFORMATION COMMISSION

REGISTERED

**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

P-25

Phone : 091-9213750, 9213563
Ext : 1038
Website : www.kopsc.gov.pk



No. PSC/SR-II/ 014915

Dated: 13/4/16

To

Dr. Muhammad Zafar
Directorate General (Extension) Livestock & Dairy
Development, KPK Near Bacha Khan Chowk Peshawar.

Subject: PROVISION OF INFORMATION UNDER RTI ACT 2013 KPK.

Memo:-

I am directed to refer to your application on the subject cited above and to state that (i) Commission sent a single seniority list of Veterinary Officer (Health) as per record on 27.03.2010 wherein you are placed at merit order NO.4.

(i). Same as above.

(ii). Same as above.

(iii). Same as above.

(iv). According to Appointment, promotion, Transfer rules and Estacode

the seniority list has been conveyed to the parent Department and no violation has been made in this regard.

(FAZAL QAYYUM)
ASSISTANT DIRECTOR-III

Endst: No. _____ Dated: _____

Copy to:-

✓ Secretary Right to Information Commission, Khyber Pakhtunkhwa Peshawar, reference to his letter No.RTIC/AR/1-1941/16/3615 dated 1/04/2016.

Right to Information Commission Government of KPK.
Diary No: <u>2620</u>
Date: <u>14-4-16</u>
Section: <u>AR</u>

(FAZAL QAYYUM)
ASSISTANT DIRECTOR-III

AT

Annex - 7
P-25



DIRECTORATE GENERAL (EXTENSION) LIVESTOCK & DAIRY DEVELOPMENT KHYBER PAKHTUNKHWA

Bacha Khan Chowk, Charsadda Road Peshawar. Email: dglddext@yahoo.com Tel: 091-9210276, 9210249, Fax: 091-9210285

Dated Peshawar the 13/04/2016

No: DG L&DD (E) _____

To

The Secretary,
To Government of Khyber Pakhtunkhwa,
Agriculture, Livestock, Fisheries and Cooperative Department,
Peshawar.

Attention Section Officer (LFC)

Subject: RECTIFICATION OF SENIORITY LIST OF BPS-17 OFFICERS (ADVERTISEMENT NO: 03/2007)

With reference to the subject cited above and to state that Dr. Muhammad Zafar, Veterinary Officer (Health), has submitted an application for correction of seniority list of BPS-17 officers of this office. The officer was selected by the Khyber Pakhtunkhwa Public Service Commission through advertisement No: 03/2007 (Annex-1), whereby, various posts of BPS-17 officers were advertised for recruitment by the Public Service Commission i.e. (01 Sheep Development Inspector at Serial No. 7, 01 Agrostologist at serial No. 8, 02 Instructors at Serial No. 9, 2 Veterinary Officers (Research) & 20 Veterinary Officers (Health) at Serial No. 10). The required qualification criteria for all the posts were different.

The recommendations for the posts at serial no: 10 i.e (Veterinary Officer Health) were made earlier than the rest of posts at Serial No. 9, 8, & 7 and were appointed 3 months earlier through separate interview as narrated in the below table, wherein Dr. Muhammad Zafar was placed at serial 04 of the inter-se-seniority list issued by the Khyber Pakhtunkhwa Public Service Commission dated 20.02.2009 (Annex-2). The appointments made by the competent authority by the recommendations of the Public service Commissions are given below:

S #	Name of the officer	No: & Date of Recommendations by the KP, PSC	No. & Date of Appointment orders
1.	Muhammad Zafar	Letter No: 1182 dated: 14.02.2007 (Annex-3)	NO: SO (L&DD) AD-E-1 (141)/2008/KC dated: 8 th April, 2008 (Annex-5)
2.	Dr. Abbas Ali	Letter No: SRA/14667 dated: 19.03.2008, SRA/14666 dated: 19.03.2008, SRA/14754 dated 20.03.2008 (Annex-4)	NO: SO (L&DD) AD-E-1 (141)/2008/KC dated: 3 rd June, 2008 (Annex-6)
3.	Dr. Inamullah Khan		

Similarly, a 2nd Inter-Se-Seniority list was issued by the commission dated 27.03.2010 whereby, he was placed serial no. 4 (Annex-7). Third inter-se-seniority list was issued by the commission dated 02.11.2010 whereby Dr. Muhammad Zafar was placed at merit order No. 6 while, the officers at S # 2 & 3 of the above table were placed at the top of the inter-se- list (Annex-8).

The officer concerned approached Khyber Pakhtunkhwa, Public Service Commission for provision of information under Right to Information Act 2013 (Annex-9), whereby, he was informed through registered letter No: 014914 dated 13.04.2016 that the commission has issued single seniority list of Veterinary Officers (Health) as per their record on 27.03.2010 and have placed the applicant at serial No. 04 (Annex-10)

Keeping in view the above elucidation, it is requested that the Khyber Pakhtunkhwa, Public service commission may kindly be approached to clarify the merit positions of all the officers in the advertisement No: 03/2007 under the Appointment, Promotion & Transfer Rules, 1989, please.

(DR. SHEER MUHAMMAD)
DIRECTOR GENERAL

Phone : 091-9213551
Fax : 091-9211795
Website : www.kppsc.gov.pk



**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

No. PSC/SR-1/ 0998
Dated: 5-4-18

Annex H
P-26

To.

The Secretary, Govt of Khyber Pakhtunkhwa,
Agriculture Livestock and Cooperative
Department Peshawar:

Subject: **RECTIFICATION OF SENIORITY LIST OF (B-17) OFFICER
ADVT; NO.03/2007.**

Dear Sir,

I am directed to refer to your letter No.SO(LFC)AD-E-I(141)2016 dated; 08.05.2017, and to state that the combined inter-Se-Seniority of Veterinary Officer, Instructor, Sheep Development Inspector, and Agrostologist issued on 02.11.2010 copy enclosed is intact please.

Yours faithfully,

P 5/4

(Abdul Latif)
Assistant Director-III

REGISTERED

K.P.K PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar Cantt, (Near Governor House)
PH No. 9213563
Fax No. 9211795



No.K.P.K-PSC-SR-VI/

Dated: 2/11/20

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Amr: I
P-27

To,

The Secretary to Govt:of Khyber Pukhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject: - INTER-SE-SENIORITY LIST OF VARIOUS SUBJECTS
LIVESTOCK RESEACH WING AND EXTENSION WING.

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith
a combined Seniority list of various subjects relating to Livestock Research Wing and
Extension Wing for your record and necessary action please.

Yours faithfully,

(SYED ILYAS SHAH)
DEPUTY SECRETARY-III

Endost No. _____ dated _____

Copies alongwith copy of respective Inter-Se-Seniority is forwarded to :-

1. The Director General Livestock (Extension Wing) KPK Peshawar
2. The Director General Livestock (Research Wing) KPK Peshawar

(SYED ILYAS SHAH)
DEPUTY SECRETARY-II

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Annex: 5
 (21)
 P-28

INTER-SE-SENIORITY LIST OF OFFICERS (B-17) IN LIVESTOCK (EXTENSION WING) (03/2007)

S.No.	Marks	D.O.B	Name With Father's Name	Subject	Domicile
1.	77/47	01.01.84	Abbas Ali S/O Munawar Khan	Instructor	Nowshera/2
2.	71/46	30.08.80	Inam Ullah Khan S/O Saad Ullah Khan	Sheep Devel: Inspector	Charsadda/2
3.	70/45	21.03.84	Sahibzada Shafi Ullah S/O Sahibzada Nasr Ullah	Agrostologist	Peshawar/2
4.	67/39	01.06.83	Haq Aman Ullah S/O Akhtar Ali Khan	Veterinary Officer Health	Karak/4
5.	63/42	01.01.76	Akbar Ali S/O Mutabar Khan	Veterinary Officer Health	Dir/3
6.	63/42	01.12.83	Muhammad Zafar S/O Muhammad Naseem	Veterinary Officer Health	Bannu/4
7.	63/36	15.12.83	Siraj Ud Din S/O Muhammad Younis	Instructor	Bajaur Agency/1
8.	62/39	15.04.81	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Veterinary Officer Health	Buner/3
9.	60/39	19.08.80	Rahat Ali S/O Daulat Mand	Veterinary Officer Health	Swat/3
10.	60/36	04.05.80	Mohammad Bilal S/O Qabil Shah	Veterinary Officer Health	Mardan/2
11.	59/39	11.03.75	Muhammad Tufail S/O Muhammad Bashir	Veterinary Officer Health	Bannu/4
12.	59/39	19.04.79	Shahid Zaman S/O Farooq Zaman	Veterinary Officer Health	Bannu/4
13.	59/39	08.05.79	Ahmad-Ur-Rehman S/O Mati-Ur-Rehman	Veterinary Officer Health	N.W. Agency/1
14.	59/39	05.07.80	Saeed Khan S/O Abdur Rehman	Veterinary Officer Health	Mardan/2
15.	58/36	01.01.78	Fazli Elahi S/O Musharaf Shah	Veterinary Officer Health	Moh: Agency/1
16.	58/36	05.12.80	Hashim Khan S/O Dr. Ijaz Ahmad	Veterinary Officer Health	Haripur/5
17.	57/39	01.01.81	Muhammad Hanif Khan S/O Azim Khan	Veterinary Officer Health	Moh: Agency/1
18.	57/39	04.04.81	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	Veterinary Officer Health	F.R. Peshawar/1
19.	57/36	01.04.80	Zia-Ur-Rehman S/O Shams-Ur-Rehman	Veterinary Officer Health	Buner/3
20.	57/36	01.06.80	Muhammad Ismail S/O Nasrem Jan	Veterinary Officer Research	Nowshera/2
21.	57/36	04.10.84	Ibadullah Jan S/O Pordal Khan	Veterinary Officer Health	Charsadda/2
22.	56/36	01.03.79	Aziz Ahmad S/O Atta Ullah	Veterinary Officer Health	Swat/3
23.	54/36	24.04.77	Attiq-Ur-Rehman S/O Haji Habib-Ur-Rehman	Veterinary Officer Health	Bannu/4
24.	53/36	07.05.79	Shahzad Naveed S/O Aurang Zeb Khan	Veterinary Officer Health	Abbottabad/5

(SYED ILYAS SHAH)
 DEPUTY SECRETARY-II

**KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION**

2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 27.01.2014

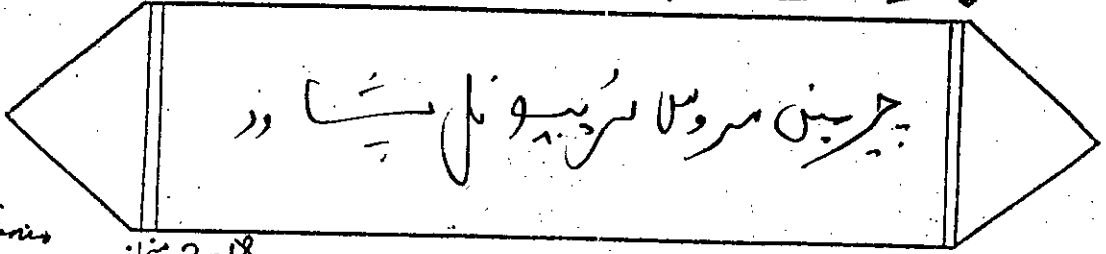
ADVERTISEMENT No. 01 / 2014.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **28.02.2014** (candidates applying from abroad by 14.03.2014). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

AGRICULTURE LIVESTOCK & COOPERATIVE DEPTT:						
1.	SEVENTY ONE (71) POSTS OF VETERINARY OFFICER (HEALTH) IN LIVESTOCK & DAIRY DEVELOPMENT DEPTT:					
	QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from a recognized University and registered with Pakistan Veterinary Medical Council (PVMC)					
	AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes					
	ALLOCATION:					
	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
	17	12	12	12	09	09
2.	EIGHT (08) POSTS OF FEMALE VETERINARY OFFICER (HEALTH) IN LIVESTOCK & DAIRY DEVELOPMENT DEPTT: (WOMEN QUOTA)					
	QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from a recognized University and registered with Pakistan Veterinary Medical Council (PVMC)					
	AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Female					
	ALLOCATION: Merit					
3.	TWO (02) POSTS OF VETERINARY OFFICER (HEALTH) (DISABLED QUOTA) IN LIVESTOCK & DAIRY DEVELOPMENT DEPTT:					
	QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from a recognized University and registered with Pakistan Veterinary Medical Council (PVMC)					
	AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes					
	ALLOCATION: Merit					
4.	THREE (03) POSTS OF RESEARCH OFFICER IN LIVESTOCK & DAIRY DEVELOPMENT DEPTT: (RESEARCH WING)					
	QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences recognized by Pakistan Veterinary Medical Council (PVMC)					
	AGE LIMIT: 22 to 32 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes					
	ALLOCATION: One each to Zone-1, 2 & 3.					

5.	<p>ONE (01) POST OF MALE LIVESTOCK PRODUCTION OFFICER (HEALTH) IN LIVESTOCK & DAIRY DEVELOPMENT DEPTT:</p> <p>QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry from a recognized University or (ii) Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized University and registered with Pakistan Veterinary Medical Council (PVMC)</p> <p>AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: Merit.</p>
6.	<p>TWO (02) POSTS OF FEMALE LIVESTOCK PRODUCTION OFFICER (HEALTH) IN LIVESTOCK & DAIRY DEVELOPMENT DEPTT:</p> <p>QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry from a recognized University or (ii) Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized University and registered with Pakistan Veterinary Medical Council (PVMC)</p> <p>AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Female ALLOCATION: One each to Zone-3 & Zone-4.</p>
7.	<p>ONE (01) POST OF INSTRUCTOR IN AGRICULTURE, LIVESTOCK & DAIRY DEVELOPMENT DEPTT:</p> <p>QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry from a recognized University or (ii) Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from recognized University and registered with Pakistan Veterinary Medical Council (PVMC)</p> <p>AGE LIMIT: 22 to 35 years. PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes ALLOCATION: Zone-2.</p>
BOARD OF REVENUE	
8.	<p>THREE (03) POSTS OF COMPUTER OPERATOR</p> <p>QUALIFICATION: 2ND Class Bachelor Degree from a recognized University with One Year Diploma in Information Technology from a recognized Board of Technical Education or its equivalent.</p> <p>AGE LIMIT: 18 to 28 years. PAY SCALE: BPS-12 ELIGIBILITY: Both Sexes ALLOCATION: Zone-1, 4 and 5..</p>
COMMUNICATION & WORKS DEPARTMENT	
9.	<p>TWO (02) LEFTOVER POSTS OF FEMALE SUB ENGINEER CIVIL (WOMEN QUOTA) IN C&W DEPTT:</p> <p>QUALIFICATION: Diploma of Associate Engineering (Civil) from a recognized Board of Technical Education.</p> <p>AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11 ELIGIBILITY: Female ALLOCATION: Merit.</p>
ENVIRONMENT DEPARTMENT	
10.	<p>FOUR (04) POSTS OF SUB DIVISIONAL WILDLIFE OFFICER IN OFFICE OF CHIEF CONSERVATOR OF WILDLIFE</p> <p>QUALIFICATION: i) Master Degree in Wildlife, Forestry or National Park Management from a recognized University/ Institute; or (ii) M.Sc Zoology or Botany in 2nd Division from a recognized University; or (iii) B.Sc Wildlife/ Forestry or Bachelor of Veterinary Science/ B.Sc Animal Husbandry or Doctor of Veterinary Medicine from a recognized University/ Institute.</p>

بعد الت بناب



Petition 2018ء منجانب

ڈاکٹر محمد ظفر بنام حکومت

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام Service Tribunal کیلئے کلف لائٹ حکم صلا اسٹہ انڈیکس 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 حالت فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک در و پیہا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہ 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 لکھدیا کہ سندر ہے۔

المرقوم _____ ماہ _____ 20

واہ العب _____

بمقام مندرجہ سربو نل سبب کے لئے منظور ہے۔

ڈاکٹر محمد ظفر بنام حکومت

Attested
Accepted
محمد ظفر بنام حکومت

بعد الت جناب سرس ٹریبونل صوبہ سندھ پشاور

R. No. 647 منجانب

ڈاکٹر محمد شفیع بنام محکمہ صحت پشاور

دعویٰ اپیل For R. No. 647

باعث شکریہ اینکہ

مقدمہ مذکورہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آل مقام پشاور کیسٹم سٹند اڈا خان سرودتے ایڈوکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر عطف دینے جواب دہی اور اقبال دعویٰ اور بھرتی ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور مرضی دعویٰ اور درخواست ہر قسم کی تعلیق اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مستثنیٰ ہوگا نیز دائر کرنے اپیل نگران و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مشاور قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور اس پر مقدمہ مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظر اور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام درورہ پر ہو یا عدت سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

الترتوم 31/3/59

العبد

العبد

العبد

سید اہد علی

سید اہد علی خان مروت

ایڈوکیٹ

ایڈوکیٹ

عن رؤیتہ تار

ایڈوکیٹ

Dr. Abbas Ali

Munir

Dr. Inamullah

Inamullah

50 روپے



15656

ایڈویکیٹ: فوزیہ احمد
بار کونسل ایسوسی ایشن نمبر: B.C. 107400
رابطہ نمبر: 0300-9596181

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: ممبر کونسل ایسوسی ایشن و جنرل کونسل پشاور

مخانب: <u>اسپرینٹ</u>	دعویٰ:
<u>ڈاکٹر محمد ظفر</u>	علت نمبر:
<u>بنام</u>	مورخہ:
<u>صورت و طرز</u>	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام اسپرینٹ کیلئے فوزیہ احمد، الکلیہ اسپرینٹ، مجلس ایسوسی ایشن پشاور 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 بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں 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 کاروائی 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 داختر منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حوالے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: _____
_____ واہ شد _____
_____ مقام _____

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

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR,
SERVICE APPEAL NO. 1205/2018

Dr. Muhammad Zafar.....**Petitioners**

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa & Others.....**Respondents**

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3.	Appointment order of the Appellant.	A	4-5
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5.	Several Correspondences regarding rectification in seniority list & Reply of Khyber Pakhtunkhwa Public Service Commission along with intact Seniority List.	C	7-13
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 1205/2018

Dr. Muhammad Zafar..... Appellant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa & Others..... Respondents

Para-wise comments on behalf of the respondent No.1, 2 & 3.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:

1. That the appellant has got no locus standi for filing this appeal.
2. That the appeal is liable to be dismissed on the ground of mis joinder or non joinder of parties.
3. The appeal is based on illegal and unlawful presumptions.
4. The appellant has got no cause of action to file the present appeal.
5. The appeal is not maintainable in its present form.

FACTS


1. Correct to the extent that the appellant along with 11 others were appointed as Veterinary Officers (Health) in Livestock and Dairy Development Department Khyber Pakhtunkhwa dated 08/04/2008 through serial No. 10 in advertisement No. 3/2007. (Annexure-A).
2. Correct.
3. Related to respondent No. 04 & 05.
4. Related to respondent No. 04 & 05.
5. Related to respondent No. 04 & 05.
6. Related to respondent No. 04 & 05.
7. Correct to the extent that respondent No. 03 after receiving application from the appellant regarding rectification in the seniority list of BS-17 officers, approached respondent No.02 through letter dated 13/10/2016 with request to clarify the merit positions of all the officers in the advertisement No. 03/2007 under the Appointment, Promotion and Transfer Rules, 1989. (Annexure-B). It is pertinent to mention here that the respondent No. 02 after several correspondences with the office of respondent No. 04 & 05 through letter No. SO (LFC)AD-E-I (141) 2016 Dated 26/01/2016 and subsequent letter No. SO (LFC)AD-E-I(141)2016 Dated 08/05/2017, received a letter No. 09984 Dated 05/04/2018 from the office of respondent No.04 and 05, which stated that the inter-se-seniority list issued on 02/11/2010 is intact. (Annexure-C).
8. As stated in Para No. 07.
9. No Comments.


ATTEND



Grounds

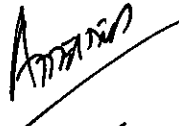
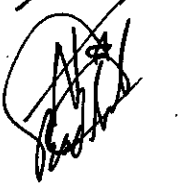
- A. Related to respondent No. 04 & 05.
- B. Related to respondent No. 04 & 05.
- C. Related to respondent No. 04 & 05.
- D. Related to respondent No. 04 & 05.
- E. Related to respondent No. 04 & 05.
- F. Related to respondent No. 04 & 05.
- G. The respondents seek permission to raise additional grounds at the time of arguments.
- H. No Comments.

In view of the parawise comments it is respectfully prayed that by accepting the same, The instant Appeal may kindly be dismissed in the best interest of public with cost.


Respondent No. 01
Chief Secretary, Government of
Khyber Pakhtunkhwa
Peshawar


Respondent No. 02
Secretary Agriculture, Livestock &
Cooperatives Department Khyber
Pakhtunkhwa Peshawar



Respondent No. 03
Director General (Ext) Livestock &
Dairy Development Department
Peshawar






Grounds

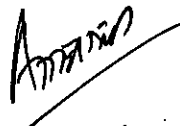
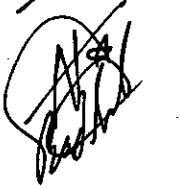
- A. Related to respondent No. 04 & 05.
- B. Related to respondent No. 04 & 05.
- C. Related to respondent No. 04 & 05.
- D. Related to respondent No. 04 & 05.
- E. Related to respondent No. 04 & 05.
- F. Related to respondent No. 04 & 05.
- G. The respondents seek permission to raise additional grounds at the time of arguments.
- H. No Comments.

In view of the parawise comments it is respectfully prayed that by accepting the same, The instant Appeal may kindly be dismissed in the best interest of public with cost.


Respondent No. 01
Chief Secretary, Government of
Khyber Pakhtunkhwa
Peshawar


Respondent No. 02
Secretary Agriculture, Livestock &
Cooperatives Department Khyber
Pakhtunkhwa Peshawar



Respondent No. 03
Director General (Ext) Livestock &
Dairy Development Department
Peshawar






Grounds

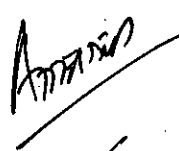
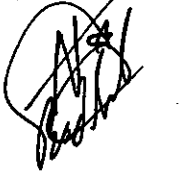
- A. Related to respondent No. 04 & 05.
- B. Related to respondent No. 04 & 05.
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- D. Related to respondent No. 04 & 05.
- E. Related to respondent No. 04 & 05.
- F. Related to respondent No. 04 & 05.
- G. The respondents seek permission to raise additional grounds at the time of arguments.
- H. No Comments.

In view of the parawise comments it is respectfully prayed that by accepting the same, The instant Appeal may kindly be dismissed in the best interest of public with cost.


Respondent No. 01
Chief Secretary, Government of
Khyber Pakhtunkhwa
Peshawar


Respondent No. 02
Secretary Agriculture, Livestock &
Cooperatives Department Khyber
Pakhtunkhwa Peshawar


Respondent No. 03
Director General (Ext) Livestock &
Dairy Development Department
Peshawar

GOVERNMENT OF PESHAWAR
AGRICULTURE, LIVESTOCK & COOPERATION
DEPARTMENT PESHAWAR

ANNEX - A

Dated Peshawar, the April 8, 2008.

(4)

NOTIFICATION

No. SO(L&DD)AD-E-1(141)/2008/KC. Consequent upon recommendation of the NWFP Public Service Commission, the competent authority is pleased to appoint the following as Veterinary Officer (Health) in BS-17 (Rs.8210-815-20510 plus usual allowances as admissible under the rules) on regular basis with immediate effect under the provision of Government of NWFP Establishment & Administration Department circular bearing No.SOR-6(E&AD)13-1/2005 dated 10.8.2005:-

1. Dr. Akbar Ali S/O Mr. Mutabar Khan Village, Safari P/O Timergara Tehsil Balamabat District Dir (Lower).
2. Dr. Haq Amanullah S/O Mr. Akhtar Ali Khan Village & P/O Paloski Tehsil Takht Nasrati, District Karak
3. Dr. Muhammad Ubaidullah Qureshi S/O Mr. Muhammad Jamalullah Qureshi, Village & P/O Totalai, Mohalla Qazi Abail District Buner Via Sawabi
- ✓ 4. Dr. Muhammad Zafar S/O Muhammad Jaseem, Kotka Abdül Qadir Shah Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu
- ✓ 5. Dr. Muhammad Tufail S/O Mr. Muhammad Bashir House No.845, Sector D/4, Street No.35 Phase No.1, Hayatabad, Peshawar.
6. Dr. Hasham Khan S/O Dr. Ijaz Ahmad Village & P/O Mirpur, Tehsil & District Haripur
7. Dr. Rahit Ali S/O Mr. Daulat Mand Village & P/O Fatehpur Tehsil & District, Swat
8. Dr. Saeed Khan S/O Mr. Abdur Rahman Village & P/O Jalala, Tehsil Takht Bhai Distarict Mardan
9. Dr. Zia Ur Rahman S/O Shamsur Rahman Village & P/O Totalai Mohalla Jaffar Khail District Buner
10. Dr. Muhammad Hayas Afridi S/O Mr. Shad Muhammad Afridi Mohalla Sharat Khel Kohi Hassan, Khel F R Peshawar
11. Dr. Aziz Ahmad S/O Mr. Attaullah Village & P/O Kokarai, Tehsil Saidu Sharif District Swat
12. Dr. Attiq Rahman S/O Mr. Haji Habib ur Rahman Village & P/O Ghoriwala Tehsil & District Bannu

2. On their appointment, they are hereby posted/adjusted on the following posts mentioned against their names, subject to the terms & conditions given below.

Sl.No.	Name of Officer	Place of posting	Remarks
1.	Dr. Akbar Ali	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Khal District Dir Lower	Against vacant post.
2.	Dr. Haq Amanulla	Veterinary Officer (H) In-charge Civil Veterinary Hospital Latambar District Karak	--do--
3.	Dr. Muhammad Ubaid Ullah Qureshi	Veterinary Officer (H) In-charge Civil Veterinary Hospital Topi District Swabi	--do--
4.	Dr. Muhammad Zafar	Veterinary Officer (H) In-charge Civil Veterinary Hospital Nahaqi District Peshawar	--do--

Approved
T. H. P. S. P. S.

(A)

5.	Dr. Muhammad Tufail	Additional Veterinary Officer Civil Veterinary Hospital Peshawar	Against vacant post
6.	Dr. Hashim Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Burfa District Mansohra	--do--
7.	Dr. Rahat Ali	Veterinary Officer (Health) In-charge Artificial Insemination Center Saidu Sharif Swat	--do--
8.	Dr. Saëed Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dheri Jolagram Malakand Agency	--do--
9.	Dr. Zia-Ur-Rahman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dhodher Chowk District Swabi	--do--
10.	Dr. Aziz Ahmad	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Puran District Shangla	--do--
11.	Dr. Attiq-ur-Rehman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Titer Khel District Lakki Marwat	--do--
12.	Dr. Muhammad Nyal Afridi	His services are placed at the disposal of Civil Secretariat FATA.	The officer may further be adjusted against vacant post of Veterinary Officer (Health) in the Livestock and Dairy Development Department FATA

5

TERMS AND CONDITIONS.

- i. Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005 They will however be entitled to contributory Provident Fund in such a manner and at such rates as may be prescribed by the Government.
- ii. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice, their two month's pay/allowances shall be forfeited to Government.
- iii. The appointee should join their post within 30-days of the issue of this notification. The Director Livestock and Dairy Development NWFP would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- iv. They will be on probation for a period of two years extendable for another one year.
- v. They will be governed under such rules and regulations as may be issued from time to time by the Government.
- vi. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against the NWFP Removal from Services (Special Powers) Ordinance, 2000 and the Rules framed from time to time.

Handwritten signature and initials.

To

The Director General (Extension),
Livestock & Dairy Development,
Khyber Pakhtunkhwa, Peshawar

Subject: **RECTIFICATION OF THE SENIORITY LIST OF BS-17 OFFICERS (ADVERTISEMENT NO: 03/2007).**

R / Sir

With due respect it is please stated that the matter of three inter-se-seniority lists was raised previously in the department wherein, two Veterinary officers namely Dr. Inamullah Khan and Dr. Abbas Ali were placed two steps senior than me (which have also bypassed 21 other veterinary officers) and produced a inter-se-seniority list in which the Administrative Department was also bypassed (copy attached as Annex-1). In this regard Khyber Pakhtunkhwa Public Service Commission was approached and was requested under Right to Information Act 2013 for solving the issue (Copy of application is attached as Annex-2). Assistant Director-III, Mr. Fazal Qayyum through registered letter bearing No: PSC/SR-II/014914 (copy enclosed as Annex-3) which was also endorsed to me by the Right to Information Commission Khyber Pakhtunkhwa, Peshawar bearing letter No: RTIC/AR/1-1941/16/4048 dated 18th April 2016 (copy enclosed as Annex-4), wherein, it is clearly stated that as per record of the KPPSC, KP the commission sent a single seniority list of veterinary officer (Health) on 27.03.2010 (copy enclosed as Annex-5), wherein, I was placed at merit order No: 4.

In this regard the rest of inter-se-seniority lists have been disowned by the Khyber Pakhtunkhwa, Public Service commission. It is further stated that fresh seniority list which is approved by the competent authority the actual date of appointment of the above named officers have been incorrectly incorporated deliberately to hide the facts.

Keeping in view the above facts, it is, requested that necessary correction in the seniority list of BS-17 officers in light of the Khyber Pakhtunkhwa, PSC, letter may kindly be made, please.

(Encl: A.A)

Amir
[Signature]

[Signature]
(DR. MUHAMMAD ZAFAR)
Veterinary Officer (H)
Directorate General
(Extension),
L&DD, KP, Peshawar



DIRECTORATE GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT
KHYBER PAKHTUNKHWA

Bacha Khan Chowk, Charsadda Road Peshawar. Email: dglddext@yahoo.com Tel: 091-9210276, 9210249, Fax: 091-9210285

No: DG L&DD (E) _____

Dated Peshawar the 13/04/2016

To

The Secretary,
To Government of Khyber Pakhtunkhwa,
Agriculture, Livestock, Fisheries and Cooperative Department,
Peshawar.

Attention Section Officer (LFC)

Subject: **RECTIFICATION OF SENIORITY LIST OF BPS-17 OFFICERS (ADVERTISEMENT NO: 03/2007)**

With reference to the subject cited above and to state that Dr. Muhammad Zafar, Veterinary Officer (Health), has submitted an application for correction of seniority list of BPS-17 officers of this office. The officer was selected by the Khyber Pakhtunkhwa Public Service Commission through advertisement No: 03/2007 (Annex-1), whereby, various posts of BPS-17 officers were advertised for recruitment by the Public Service Commission i.e. (01 Sheep Development Inspector at Serial No. 7, 01 Agrostologist at serial No. 8, 02 Instructors at Serial No. 9, 2 Veterinary Officers (Research) & 20 Veterinary Officers (Health) at Serial No. 10). The required qualification criteria for all the posts were different.

The recommendations for the posts at serial no. 10 i.e (Veterinary Officer Health) were made earlier than the rest of posts at Serial No. 9, 8, & 7 and were appointed 3 months earlier through separate interview as narrated in the below table, wherein Dr. Muhammad Zafar was placed at serial 04 of the inter-se-seniority list issued by the Khyber Pakhtunkhwa Public Service Commission dated 20.02.2009 (Annex-2). The appointments made by the competent authority by the recommendations of the Public service Commissions are given below:

S #	Name of the officer	No: & Date of Recommendations by the KP, PSC	No. & Date of Appointment orders
1.	Muhammad Zafar	Letter No: 1182 dated: 14.02.2007 (Annex-3)	NO: SO (L&DD) AD-E-1 (141)/2008/KC dated: 8 th April, 2008 (Annex-5)
2.	Dr. Abbas Ali	Letter No: SRA/14667 dated: 19.03.2008, SRA/14666 dated: 19.03.2008, SRA/14754 dated 20.03.2008 (Annex-4)	NO: SO (L&DD) AD-E-1 (141) /2008/KC dated: 3 rd June, 2008 (Annex-6)
3.	Dr. Inamullah Khan		

Similarly, a 2nd Inter-Se-Seniority list was issued by the commission dated 27.03.2010 whereby, he was placed serial no. 4 (Annex-7). Third inter-se-seniority list was issued by the commission dated 02.11.2010 whereby Dr. Muhammad Zafar was placed at merit order No. 6 while, the officers at S # 2 & 3 of the above table were placed at the top of the inter-se- list (Annex-8).

The officer concerned approached Khyber Pakhtunkhwa, Public Service Commission for provision of information under Right to Information Act 2013 (Annex-9), whereby, he was informed through registered letter No: 014914 dated 13.04.2016 that the commission has issued single seniority list of Veterinary Officers (Health) as per their record on 27.03.2010 and have placed the applicant at serial No. 04 (Annex-10)

Keeping in view the above elucidation, it is requested that the Khyber Pakhtunkhwa, Public service commission may kindly be approached to clarify the merit positions of all the officers in the advertisement No: 03/2007 under the Appointment, Promotion & Transfer Rules, 1989, please.

(DR. SHEH MUHAMMAD)
DIRECTOR GENERAL



GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE, LIVESTOCK & COOPERATIVES
DEPARTMENT

No. SO (LFC) AD-E-1 (141)/2016-17
Dated Peshawar the 26th January, 2017.

(Amendment - C)
8

185/
27/01/17
27/1/17

To

The Secretary,
Khyber Pakhtunkhwa Public Service Commission,
2-Fort Road, Peshawar Cantt.

Subject: **RECTIFICATION OF SENIORITY LIST OF BS-17 OFFICER
(ADVERTISEMENT NO. 03/2007).**

Dear Sir,

I am directed to refer to this department letter of even No. dated: 15.11.2016 on the above noted subject and to state that the requisite clarification is still awaited.

Therefore, it is requested that the separate inter-se-seniority of the Veterinary Officer(Research) and Veterinary Officer (Health) of Livestock & Dairy Development (Extension) already asked may please be furnished to this Department in order to finalize the Seniority list of BS-17 officers of Livestock & Dairy Development (Extension Wing), please.

Yours faithfully,

(Dr. MIR AHMAD KHAN)
SECTION OFFICER (LFC)

Endst: No. & date even:

Copy to:

1. Director General (Extension), Livestock & dairy development Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary Agriculture, Livestock & Cooperatives Deptt.

SECTION OFFICER (LFC)

Amended
[Signature]

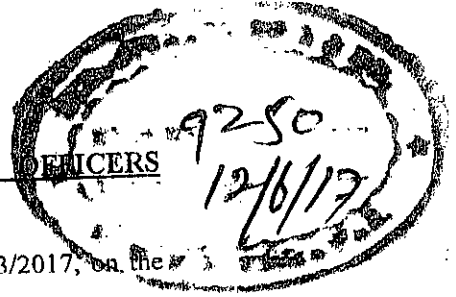


**GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT**

NO.SO(LFC)AD-E-I(141)2016
Dated Peshawar the 8th May,2017

To
The Assistant Director-III
Khyber Pakhtunkhwa Public Service Commission
Peshawar Cantt.

Subject:- RECTIFICATION OF SENIORITY LIST OF BS-17 OFFICERS
ADVERTISEMENT NO.03/2007



I am directed to refer to your letter No: PCS/SR-I/48623, dated 31/03/2017, on the above referred subject and to state that Dr. Muhammad Zafar, Veterinary Officer (Health), L&DD appointed on the recommendation of KPPSC vide Agriculture Department notification dated 8th April, 2008 (FLAG-A). The KPPSC through advertisement No.03/2007 advertised various posts including that of (01 post of Sheep Development Inspector at Sr.# 07, 01 post of Agrostologist at Sr.# 08, 02 posts of Instructors at Sr.# 09, 02 posts of Veterinary Officers (Research) & 20 Veterinary Officer (Health) at Sr.# 10) (FLAG-B). On the recommendation of KPPSC vide letter dated 14/02/2007 (FLAG-C) the appointment against the post at Sr.No.10 Veterinary Officer (Health) was made on 08/04/2008 and the rest of the post at Sr.No. 7,8 & 9 recommendation was separately received vide letters dated 19/03/2008 & 20/03/2008 (FLAG-D) subsequently appointed on 03/06/2008 (FLAG-E). The KPPSC issued first seniority list on 20/02/2009 (FLAG-F) and placed Muhammad Zafar on the inter-se-seniority / merit No. 04. The second seniority list issued on 27/03/2010 (FLAG-G) maintained his seniority position at 04 but his nomenclature of post was written as Veterinary Officer (Research) which was incorrect. The KPPSC issued another seniority list dated 02/11/2010 and placed Dr. Muhammad Zafar at Seniority No. 06 (FLAG-H).

12/6/17

2. Dr. Muhammad Zafar had also approached to KPPSC and asked information under RTI Act-2013 and he was informed vide letter dated 13/04/2016 that vide letter dated 27/03/2010 a single seniority list of Veterinary Officer Health was issued and he was placed at merit order No.4 (FLAG-I). Now vide above referred letter dated 31/03/2017; the KPPSC has responded that the combined inter-se-seniority of the Commission recommendees for the posts of Veterinary Officer (BS-17) against 5/2003, 7/2003, 3/2006, 3/2007 & 3/2008 has already been conveyed vide letter dated 23/03/2010. Later on the same list was revised due to correction of subject entry from Veterinary Officer (Research) to Veterinary Officer (Health) in respect of Muhammad Zafar S/o Muhammad Naseem of District Bannu/4 placed at serial no.06 with inclusion of three names of other candidates namely Abbas Ali S/o Munawar Khan, Inam Ullah Khan S/o Saad Ullah Khan and Sahibzada Sharif Ullah S/o Sahibzada Nasrullah for the post of Instructor, Sheep Development Inspector & Agrostologist respectively. The copy of revised merit list has already been conveyed vide letter dated 02/11/2010 and further advised to process the case accordingly.

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3. It is further to add that the posts of Agrostologist, Sheep Development Inspector, Instructor and Veterinary Officer (H) are single cadre having one seniority; whereas the Veterinary Officer (Research) is a separate cadre and separate attach department. The above contradictory correspondence of KPPSC has made the issue complex as the department had issued / notified seniority list annually and placed Dr. Zafar at Seniority No. corresponding to his position at S.No.06 of the inter-se-seniority communicated by the KPPSC. Now the officer has appealed for correction in light of the information provided to him by the KPPSC under RTI. Act.

SE.
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2
30/5

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GOVERNMENT OF KHYBER PAKHTUNKHWA
 AGRICULTURE LIVESTOCK & COOPERATIVE
 DEPARTMENT

(C)
 10

4. In view of the above, it is requested that KPPSC may clarify, whether the seniority position of Dr. Muhammad Zafar as per inter-se-seniority list is at Sr.No.06 or 04, so that the issue may be resolved once for all.

(DR. MIR AHMAD KHAN)
 SECTION OFFICER (LFC)

Copy of the above is forwarded to the:-

1. Director General (Extension), Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary, Agriculture Department.
3. PS to Deputy Secretary (Admin), Agriculture Department.

SECTION OFFICER (LFC)
 Ph: 091-9210973

NO. 18/33/B&H 11607 10th dt: 12.6.12/77

The case relates to Dy (Ext) Livestock
 and may be returned in original form.

Suppl: Yes
 20/1/17

[Signature]
 31/5/17

[Signature]
[Signature]

001-9213551
091-9211795
www.kppsc.gov.pk



KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-Fort Road, Peshawar Cantt.

No. PSC/SR-1/ 0998
Dated: 5-4-18

Annex: 1
P-11

To.

The Secretary, Govt of Khyber Pakhtunkhwa,
Agriculture Livestock and Cooperative
Department Peshawar:

Subject: RECTIFICATION OF SENIORITY LIST OF (B-17) OEMCER
ADVT; NO.03/2007.

Dear Sir,

I am directed to refer to your letter No.SO(LFC)AD-E-I(141)2016 dated; 08.05.2017, and to state that the combined inter-Se-Seniority of Veterinary Officer, Instructor, Sheep Development Inspector, and Agrostologist issued on 02.11.2010 copy enclosed is intact please.

Yours faithfully,

P 5/4

(Abdul Latif)
Assistant Director-III

Approved
[Signature]

REGISTERED

K.P.K PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar Cantt, (Near Governor House)
PH No. 9213563
Fax No. 9211799



No.K.P.K-PSC-SR-VI

Dated: 2/11/2010

Amr: E
129

To:

The Secretary to Govt of Khyber Pukhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject: - INTER-SE-SENIORITY LIST OF VARIOUS SUBJECTS
LIVESTOCK RESEACH WING AND EXTENSION WING.

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith
combined Seniority list of various subjects relating to Livestock Research Wing and
Extension Wing for your record and necessary action please.

Amr
[Signature]

Yours faithfully,

[Signature]
(SYED ILYAS SHAH)
DEPUTY SECRETARY-III

Endost No. _____ dated _____
Copies alongwith copy of respective Inter-Se-Seniority is forwarded to :-

1. The Director General Livestock (Extension Wing) KPK Peshawar
2. The Director General Livestock (Research Wing) KPK Peshawar

(SYED ILYAS SHAH)
DEPUTY SECRETARY-II

2/11/10
BS
So CAD

[Signature]
[Signature]
[Signature]

110441
02-11-10

D.No. 299
5/11/2010

INTER-SE-SENIORITY LIST OF OFFICERS (B-17) IN LIVESTOCK (EXTENSION WING) (03/2007)

3

S.No.	Marks	D.O.B.	Name With Father's Name	Subject	Domicile
1.	77/47	01.01.84	Abbas Ali S/O Munawar Khan	Instructor	Nowshera/2
2.	71/46	30.08.80	Ibrahim Ullah Khan S/O Sard Ullah Khan	Sheep Devel: Inspector	Charsadda/2
3.	70/45	21.03.84	Sahibzada Shafi Ullah S/O Sahibzada Nasr Ullah	Agrostologist	Peshawar/2
4.	67/39	01.06.83	Haq Aman Ullah S/O Akhtar Ali Khan	Veterinary Officer Health	Karak/4
5.	63/42	01.01.76	Akbar Ali S/O Mutabar Khan	Veterinary Officer Health	Dir/3
6.	63/42	01.12.83	Muhammad Zafar S/O Muhammad Nascem	Veterinary Officer Health	Bannu/4
7.	63/36	15.12.83	Siraj Ud Din S/O Muhammad Younis	Instructor	Bajaur Agency/1
8.	62/39	15.04.81	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Veterinary Officer Health	Buner/3
9.	60/39	19.08.80	Rahat Ali S/O Daulat Mand	Veterinary Officer Health	Swat/3
10.	60/36	04.05.80	Mohammad Bilal S/O Qabil Shah	Veterinary Officer Health	Mardan/2
11.	59/39	11.03.75	Muhammad Tufail S/O Muhammad Bashir	Veterinary Officer Health	Bannu/4
12.	59/39	19.04.79	Shahid Zaman S/O Farooq Zaman	Veterinary Officer Health	Bannu/4
13.	59/39	08.05.79	Ahmad-Ur-Rehman S/O Mati-Ur-Rehman	Veterinary Officer Health	N.W Agency/1
14.	59/39	05.07.80	Saced Khan S/O Abdur Rehman	Veterinary Officer Health	Mardan/2
15.	58/36	01.01.78	Fazli Elahi S/O Musharaf Shah	Veterinary Officer Health	Moh: Agency/1
16.	58/36	05.12.80	Hashim Khan S/O Dr. Ijaz Ahmad	Veterinary Officer Health	Haripur/5
17.	57/39	01.01.81	Muhammad Hanif Khan S/O Azim Khan	Veterinary Officer Health	Moh: Agency/1
18.	57/39	04.04.81	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	Veterinary Officer Health	F.R Peshawar/1
19.	57/36	01.04.80	Zia-Ur-Rehman S/O Shams-Ur-Rehman	Veterinary Officer Health	Buner/3
20.	57/36	01.06.80	Muhammad Ismail S/O Nasrem Jan	Veterinary Officer Research	Nowshera/2
21.	57/36	04.10.84	Ibadullah Jan S/O Pordal Khan	Veterinary Officer Health	Charsadda/2
22.	56/36	01.03.79	Aziz Ahmad S/O Atta Ullah	Veterinary Officer Health	Swat/3
23.	54/36	24.04.77	Attiq-Ur-Rehman S/O Haji Habib-Ur-Rehman	Veterinary Officer Health	Bannu/4
24.	53/36	07.05.79	Shahzad Naveed S/O Aurang Zeb Khan	Veterinary Officer Health	Abbottabad/5

[Handwritten Signature]

(SYED ILYAS SHAH)
DEPUTY SECRETARY-II

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S. A. No. 1205 / 2018

Dr. Muhammad Zafar

versus

Chief Secretary & Others

**WRITTEN STATEMENT ON BEHALF OF
RESPONDENT NO. 06 & 07 (DR. ABBAS ALI
& DR. INAM ULLAH):****Respectfully Sheweth:****Preliminary Objections:-**

1. That the departmental appeal of appellant annexed with the service appeal at P. No. 23 neither bare date nor stamp so the same cannot be treated as such.
2. That the appeal of the appellant is hopelessly time barred.
3. That combine inter-se seniority list was issued wherein appellant viz-a-viz R. No. 06 & 07 was assigned merit position wherein appellant was placed at S. No. 06 and respondents No. 06 & 07 were placed at S. No. 01 & 02 much senior than appellant.
4. That separate seniority list of any assignment does not give right to anyone of seniority.

ON FACTS:-

1. In response to Para No. 01 of the appeal, it is submitted that respondents No. 06 and 07 also applied to the said advertisement but appellant applied to the post of Veterinary Officer (Health) B-17 while Respondent No. 06 applied to the post of Instructor, Sheep Development Officer and Agrostologist B-17 in extension wing of the Live Stock Department. He qualified all the three assignments but choosed post of Instructor B-17. Respondent No. 07 applied to the

post of Sheep Development Officer B-17 which was too qualified by him.

For the post of Veterinary Officer (Health) of appellant, no test was conducted by the Commission but only interview was taken. For the post of Instructor and Sheep Development Officer of Respondent No. 06 and 07, written test was conducted which was qualified by them.

Here it would be not out of place to mention that cadre of all the post is one and the same.

2. Not correct. And as stated earlier, there was no written test for the post of appellant, so he was nominated by the Commission to the department while written test and interview was conducted for the post of Respondent No. 06 and 07 which took some time, yet the same were in the same session and in the same year.
3. Not correct. In the same advertisement, the Commission advertised different posts so different nominations were made and in the Seniority list of the Commission dated 20-02-2009 and 27-03-2010, he was placed at Serial No. 04. In the subsequent combined Seniority list issued by the Commission, Respondents No. 06 was assigned merit position at Serial No. 01 and the same to Respondent No. 07 at Serial No. 02 while appellant was assigned merit at Serial No. 06. Such position clears the status of appellant viz-a-viz Respondent No. 06 and 07. The department has maintained single Seniority List for all the posts for further promotions to the post of Senior Veterinary Officer/Senior Instructor/Sheep Development Officer, B-18.
4. Such position has been cleared in Para No. 03, above.
5. Admitted correct, to the position of appellant as well as of Respondent No. 06 and 07. To further clarify the position, it is stated that for the post of appellant, only interview was taken while for the post of Respondent No. 06 and 07 written test was conducted followed by interview which process took some time but when combined merit was determined, then appellant was placed at Serial No. 06, while Respondent No. 06 and 07 were placed at Serial No. 1 and 2 in the merit list. No matter whether recommendation of

- one post was made earlier than the others but all the posts were the products of one and the same advertisement and process..
6. Does not relate to Respondent No. 06 and 07. Yet the position has been explained in the preceding paras.
 7. Not correct. Appellant has attached the presentation submitted before Respondent No. 03 but this representation bears no date to ascertain as to whether the same was well within time or time barred but from the same, it is seen that the un-dated representation is hopelessly time barred, so the appeal is not maintainable.
 8. Admitted correct by the respondents. The department sought clarification from the Commission which was confirmed that the merit / seniority list is intact.
 9. In response to this Para of the appeal, it is clarified that appellant submitted time barred appeal before the hon'ble Tribunal which is not maintainable.

GROUND:-

- A. Not correct. The appointment of appellant and R. No. 06 & 07 is the product of the same advertisement. The Commission carried out some posts earlier, while some posts later on due to the burden over the Commission. When all the process of selection and recommendation of the Commission was finalized, then appellant and respondents were assigned merit position. Appellant obtained 63 marks, while R. No. 06 77 and R. No. 07 the same as 71. So appellant was placed at S. No. 06, while respondents No. 06 & 07 were placed at S. No. 01 & 02 in the merit list.

In pursuance of the aforesaid combined merit position, appellant was placed at S. No. 06, while respondents No. 06 & 07 were placed at S. No. 01 & 02.

- B. Needs no comments on behalf of R. No. 06 & 07. By then no combined seniority list was issued regarding merit position by the Commission, so such position does not give any right to appellant.

- C. In response to para No. "C" of the ground, after finalizing over all process of selection and recommendation by the Commission, combined inter-se seniority list of the same advertisement was issued wherein merit position was assigned to appellant as well as R. No. 06 & 07.
- D. Not correct. Holding of interview earlier or later does not entitle someone to high position but when all process comes to an end, then the Commission assigns position to the parties.
- E. Not correct. All the posts have one and the same category, same scale and same pay. Such posts are inter transferable having common seniority list B-17 of the posts.
- F. Not correct. The single seniority list for the single post / assignment does not give any vested right to claim preference over others of the same cadre. No violation in the matter was ever made by any one. The department rightly determined the inter-se seniority of the incumbents of the one and the same advertisement.
- G. Not correct. No such judgment ever exists of any forum which distinguishes similarly and equally placed from one and others.
- H. Not correct. The same advertisement never made difference from one and the same category.

It is, therefore, most humbly prayed, that the appeal of appellant, being divide of merit, without substance and miserably time barred, be dismissed with cost.

R. No. 06 & 07

Dr. Abbas Ali
&

Dr. Inam Ullah)

Through

Saadullah Khan Marwat

Amjad Nawaz
Advocates

Dated 19-06-2019

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S. A. No. 1205 / 2018

Dr. Muhammad Zafar

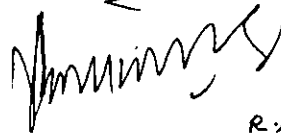
versus

Chief Secretary & Others

COUNTER AFFIDAVIT

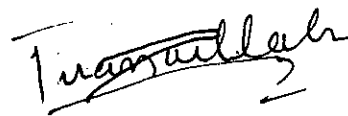
We, respondent No. 06 & 07 (Dr. Abbas Ali & Dr. Inam Ullah), do hereby solemnly affirm and declare that contents of the **Written Statement** are true and correct to the best of our knowledge and belief while that of appeal of appellant are illegal and incorrect.

I reaffirm the same on oath once again to be true and correct as per the available record.



R.No. 6.

DEPONENT



DEPONENT R.No. 07.

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

CM No. ____/2019

In Re
Appeal No. ____/2018

Dr. Muhammad Zafar **Applicant**

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa
Peshawar & Other **Respondents**

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application		1-2
2.	Affidavit		3
3.	Copy of the Notification dated. 08-07-2009.	"A"	4-6
4.	Copy of the Notification dated. 08-04-2008.	"B"	7-9
5.	Copy of the Letter dated. 14-12-2007.	"C"	10-11
6.	Copy of the Letter dated. 26-09-2017.	"D"	12
7.	Copy of the Letter dated. 08-09-2017.	"E"	13
8.	Copy of the Letter dated. 20-09-2016.	"F"	14
9.	Copy of Interview mark sheet	"G"	15-16

Applicant/Appellant

Through

Naveed Akhtar

Advocate Supreme Court
Cell No. 0300-9596181

Date: 01 /01 /2019

**IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

CM No. ____/2019

In Re
Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa
Peshawar & Other

.....Respondents

**APPLICATION FOR PERMISSION TO
BRING ON RECORD ADDITIONAL
DOCUMENTS FOR JUST AND FAIR
DECISION**

Respectfully Sheweth:

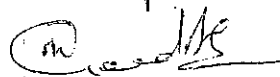
1. That the above titled appeal is pending adjudication before this Honourable Court and fixed for 01-01-2019.
2. That the annexed documents/references are very essential for the perusal of this Honourable Court to arrive at a correct conclusion. Hence, the applicant/appellant wants to place on file on original court file.
 - I. Copy of the Notification dated. 08-07-2009. Annexure "A"
 - II. Copy of the Notification dated. 08-04-2008. Annexure "B"
 - III. Copy of the Letter dated. 14-12-2007. Annexure "C"

- IV. Copy of the Letter dated. 26-09-2017. Annexure "D"
- V. Copy of the Letter dated. 08-09-2017. Annexure "E"
- VI. Copy of the Letter dated. 20-09-2016. Annexure "F"
- VII. Copy of Interview mark sheet . Annexure "G"

It is, therefore, most humbly prayed that on acceptance of this application the applicant may please be granted permission to annex occupying documents on the titled Appeal

Applicant / Appellant
Through

Dated: ___/___/2019


Naveed Akhtar
Advocate Supreme Court


ALTAF SIRAJ
Advocate High Court


Munir ud din Ghori
Advocate

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

CM No. ____/2019

In Re
Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS


Chief Secretary, Government of Khyber Pakhtunkhwa
Peshawar & Other

.....Respondents


AFFIDAVIT

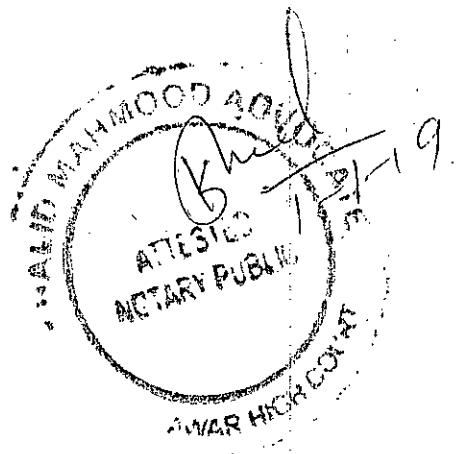
I, Dr. Muhammad Zafar, do hereby solemnly affirm and declare on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identify By


DEPONENT

21201-2258065-1


Naveed Akhtar
Advocate Supreme Court



Rumley
**GOVERNMENT OF NWFP
 AGRICULTURE, LIVESTOCK & COOPERATIVE
 DEPARTMENT**

4

Dated Peshawar the July 8, 2009

NOTIFICATION

No. SO (L&DD) AD-E-1(236)/2008/Ext. 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) Rule, 1989, the Agriculture, Livestock and Cooperatives Department, in consultation with the Establishment Department and the Finance Department hereby direct that in this department's Notification No.SO(L&DD)AD-E-1(236)/2006/Ext., dated 26.6.2007, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix, for Part-I, the following shall be substituted, namely:

**PART-I
 PROFESSIONAL STAFF**

S.No	Nomenclature of the Post	Qualifications For Appointment By Initial Recruitment	Age Limit	Method of Recruitment
1	2	3	4	5
1.	Director General Livestock and Dairy Development Department NWFP/Principal Animal Husbandry In-service Training Institute (AHITI) NWFP (BPS-20)	-----	-----	By selection on merit from amongst Directors/ Epidemiologists/Principal Veterinary Officers/ Executive District Officer (Agri)/ Training Coordinator AHITI/Wool Analyst having 10 years service in BPS-18 and above or having seventeen year service in BPS-17 and above and Registered with Pakistan Veterinary Medical Council.
2.	Director/ Epidemiologist/ Principal Veterinary Officers/ Executive District Officer (Agri)/Training Coordinator AHITI/ Wool Analyst (BPS-19)	-----	-----	By promotion on the basis of seniority-cum-fitness from amongst District Livestock Officers / Agency Livestock Officer /Deputy Directors/Senior Veterinary Officer /Senior Instructor /Deputy Epidemiologists/ Sheep Development Officers/ Livestock Economists having seven years service in BPS-18 or having twelve years service in BPS-17 and above and registered with Pakistan Veterinary Medical

District Livestock
Officers/ Agency
Livestock
Officer/ Deputy
Directors / Senior
Veterinary Officers /
Senior Instructor
AI/ITI/ Deputy
Epidemiologist/
Sheep Development
Officer
(BPS-14)

By promotion on the
basis of seniority cum
fitness, from amongst
Veterinary Officer (I-I),
Laboratory Manager/
Semen Distribution
Officer / Female
Veterinary Officers/
Livestock Production
Officers / Wholesaler/
Development Inspector/
Cattle Development
Inspector/ Instructor/
Field Dairy Assistant/
Agrostologist/ Livestock
Manager/ Female
Instructor/ Female
Programme
Coordinators, with five
years service in HPS-17
and registered with
Pakistan Veterinary
Medical Council
By initial recruitment

330
5

Livestock Economist
(BPS-18)

(i) Master Degree
in Agriculture
Economics /
Economics;
OR
(ii) Master in Business
Administration with
basic Degree of
PVM/D.Sc (Hons)
AI-I, from recognized
university with five
years experience in
Government/ Semi
Govt organization
in the relevant field
and registered with
Pakistan Veterinary
Medical Council.

30 to
35
years

Veterinary Officer
(I-I) / Laboratory
Manager/ Semen
Distribution Officer/
Female Veterinary
Officer
(BPS-17)

Doctor of Veterinary
Medicine (DVM)
OR
equivalent qualification in
Veterinary Sciences from
recognized university
and Registered with
Pakistan Veterinary
Medical Council

22 to
35
years

By initial recruitment

Director Livestock & Dairy
Dept. of K

Livestock Production
Officer/ Sheep
Development
Inspector/ Cattle
Development
Inspector/ Instructor/
Field Dairy
Assistant/
Agrostologist / Livo-
stock Manager/
Female Instructor/
Female Programme
Coordinator
(BPS-17)

(i) B.Sc. (Hons) Animal
Husbandry from a
recognized
university;
OR
(ii) Doctor of Veterinary
Medicine (DVM) or
equivalent
qualification in
Veterinary Sciences
from a recognized
university and
registered with
Pakistan Veterinary
Medical Council

22 to
35
years

By initial recruitment

Director H&A
Livestock & Dairy
Pakistan
Peshawar

Director H&A
Livestock & Dairy
Pakistan
Peshawar

7.	Veterinary Supervisor (Male/Female) (BPS-11)		---	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Veterinary Assistants (Male/Female) with ten years service in BPS-6 and above.
8.	Senior Veterinary Assistant (Male/Female) (BPS-9)		---	By promotion on the basis of seniority-cum-fitness from amongst the Veterinary Assistants (Male/Female) having seven years service as such.
9.	Veterinary Assistant (Male/Female) (BPS-6)	(a) Secondary School Certificate from a recognized board; and (b) Two years Veterinary Assistant training certificate from a recognized Training Institute.	18 to 32 Years	By initial recruitment.

(Signature)

(ATTAULLAH KHAN)
SECRETARY TO GOVT. OF NWFP,
AGRICULTURE, LIVESTOCK & COOPERATIVES
DEPARTMENT

Endst. No & Date even.

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

1. Secretary to Government of NWFP, Establishment and Administration Department Peshawar.
2. Secretary to Government of NWFP, Finance Department Peshawar.
3. Secretary to Government of NWFP, Law, Parliamentary Affairs & Human Rights Department w/r to his letter No. REG:I/(6)/1976/4398 dated 13.05.2009.
4. Director Recruitment, NWFP Public Service Commission, 2-Fort Road Peshawar Cantt. Peshawar
5. Director General (Extension), Livestock & Dairy Development, NWFP Peshawar.
6. PSO to Chief Minister NWFP.
7. PSO to Chief Secretary NWFP.
8. Manager, Government Printing Press, NWFP Peshawar. He is requested that printed (preferable gazette) copies of the notification as and when published may be furnished to this Department, Finance, Establishment and Law Departments along with details of gazette in which it is published.
9. PS to Minister for Livestock and Cooperative Department NWFP.
10. PS to Secretary Agriculture, Livestock and Cooperative Department.

(Signature)
(DR. MIR AHMAD KHAN)
SECTION OFFICER (L&DD)

736

AGRICULTURE, LIVESTOCK & COOPERATION
DEPARTMENT PESHAWAR

Dated Peshawar the April 8, 2008

NOTIFICATION

No. SO(L&DD)AD-E-1(141)/2008/KC.

Consequent upon recommendation of the NWFP Public Service Commission, the competent authority is pleased to appoint the following as Veterinary Officer (Health) in BS-17 (Rs.8210-615-20510 plus usual allowances as admissible under the rules) on regular basis with immediate effect under the provision of Government of NWFP Establishment & Administration Department circular bearing No. SQR-6(E&AD)13-1/2005 dated 10.8.2005:-

1. Dr. Akbar Ali S/O Mr. Mutabar Khan Village, Safari P/O Timergara Tehsil Balamabat District Dir (Lower).
2. Dr. Haq Amanullah S/O Mr. Akhtar Ali Khan Village & P/O Pajoski Tehsil Takhte Nasrati, District Karak
3. Dr. Muhammad Ubaidullah Qureshi S/O Mr. Muhammad Jamalullah Qureshi, Village & P/O Totalai, Mohalla Qazi Abul District Buner Via Sawabi
4. Dr. Muhammad Zafar S/O Muhammad Naseem, Kotka Abdul Qadir Shah Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu
5. Dr. Muhammad Tufail S/O Mr. Muhammad Bashir House No. 845, Sector D/4, Street No. 35 Phase No. 1, Hayatabad, Peshawar
6. Dr. Hasham Khan S/O Dr. Ijaz Ahmad Village & P/O Mirpur, Tehsil & District Haripur
7. Dr. Rabit Ali S/O Mr. Daulat Mand Village & P/O Fatehpur Tehsil & District Swat
8. Dr. Saeed Khan S/O Mr. Abdur Rahman Village & P/O Jalala, Tehsil Takht Bhai District Mardan
9. Dr. Zia Ur Rahman S/O Shamsur Rahman Village & P/O Totalai Mohalla Jaffar Khail District Buner
10. Dr. Muhammad Ilyas Afridi S/O Mr. Shah Muhammad Afridi Mohalla Sharat Khel Kohi Hassan, Khel F R Peshawar
11. Dr. Aziz Ahmad S/O Mr. Attaullah Village & P/O Kokarai, Tehsil Saidu, Sharif District Swat
12. Dr. Attiq Rahman S/O Mr. Haji Habib ur Rahman Village & P/O Ghoriwala Tehsil & District Bannu

2. On their appointment, they are hereby posted/adjusted on the following posts mentioned against their names, subject to the terms & conditions given below.

Sl.No.	Name of Officer	Place of posting	Remarks
1.	Dr. Akbar Ali.	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Khal District Dir Lower	Against vacant post.
2.	Dr. Haq Amanulla	Veterinary Officer (H) In-charge Civil Veterinary Hospital Latambar District Karak	--do--
3.	Dr. Muhammad Ubaid Ullah Qureshi	Veterinary Officer (H) In-charge Civil Veterinary Hospital Topi District Swabi	--do--
4.	Dr. Muhammad Zafar	Veterinary Officer (H) In-charge Civil Veterinary Hospital Nahaqi District Peshawar	--do--

✓ 8

5.	Dr. Muhammad Tufail	Additional Veterinary Officer Civil Veterinary Hospital Peshawar	Against vacant post
6.	Dr. Hashim Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Burfa District Mansehra	--do--
7.	Dr. Rahat Ali	Veterinary Officer (Health) In-charge Artificial Insemination Center Baidu Sharif Swat	--do--
8.	Dr. Saeed Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dheri Jolagram, Malskand Agency	--do--
9.	Dr. Zia-Ur-Rahman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dhodher Chowk District Swabi	--do--
10.	Dr. Aziz Ahmad	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Furra District Shangla	
11.	Dr. Atiq-ur-Rehman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Titer Khet District Lakki Marwat	--do--
12.	Dr. Muhammad Ilyal Afridi	His services are placed at the disposal of Civil Secretariat FATA.	The officer may further be adjusted against vacant post of Veterinary Officer (Health) in the Livestock and Dairy Development Department FATA

TERMS AND CONDITIONS:

- i. Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to contributory Provident Fund in such a manner and at such rates as may be prescribed by the Government.
- ii. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice, their two month's pay/allowances shall be forfeited to Government.
- iii. The appointee should join their post within 30-days of the issue of this notification. The Director Livestock and Dairy Development NWFP would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- iv. They will be on probation for a period of two years extendable for another one year.
- v. They will be governed under such rules and regulations as may be issued from time to time by the Government.
- vi. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against the NWFP Removal from Services (Special Powers) Ordinance, 2000 and the Rules framed from time to time.


- vii. Charge report should be submitted by all concerned.
- viii. No TA/DA will be allowed to the appointees for joining their duty.

Sd/-
SECRETARY AGRICULTURE

Endst. No. & Date even.

Copy forwarded to:

1. The Accountant General, NWFP Peshawar.
- ✓ 2. The Director, Livestock and Dairy Development NWFP Peshawar.
3. Section Officer (Estt) Civil Secretariat HATA Warsak Road Peshawar for information and further necessary action.
- 4-11. The District Accounts Officers, Dir Lower, Karak, Swabi, Mansehra, Swat, Mafakand, Shangla and Lakki Marwat.
12. The Manager, Government Printing Press, NWFP Peshawar.
- ✓ 13. Officers concerned.
14. Personal file.
15. P.S. to Chief Secretary, NWFP.


(NAEM MULLAH)
Section Officer (L&DD)

Telephone: 9217650

Recommendation
of Dr. Zafar

2

10



From: Secretary,
NWFP Public Service Commission,
Scouts Building, Phase-IV, Near Police Station,
Hayatabad, Peshawar.

To: The Secretary to Govt: of NWFP
Agriculture, Livestock and Coop: Department,
Peshawar.

No. / 51182

Dated 14/12/07

Subject:- Rectt: of Twenty Veterinary Officers Health (B-17) in L & DD
Department

Dear Sir,

I am directed to refer to your letter No. SO(L&DD)AD-E-1(141)2003 dated 27.03.2007 on the subject noted above and to state that the Commission recommends the following to the Govt: for appointment for the subject cited posts.

Sr No	Name with Father Name	Domicile/Zone
1.	Akbar Ali S/O Mutabar Khan	Dir/3
2.	Haq Aman Ullah S/O Akhtar Ali Khan	Karak/4
3.	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Buner/3
4.	Muhammad Zafar S/O Muhammad Naseem	Bannu/4
5.	Muhammad Tufail S/O Muhammad Bashir	Bannu/4
6.	Hashim Khan S/O Dr. Ijaz Ahmad	Haripur/5
7.	Rahat Ali S/O Daulat Mand	Swat/3
8.	Saeed Khan S/O Abdur Rehman	Mardan/2
9.	Zia-ur-Rehman S/O Shams-ur-Rehman	Buner/3
10.	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	F.R Pes
11.	Aziz Ahmad S/O Atta Ullah	Swat/3
12.	Attiq ur Rehman S/O Haji Habib ur Rehman	Bannu/4

Recommendations in favour of the recommendees are provisional subject to their medical fitness.

3- Recommendation in favour of Eight candidates have been kept pending and will be communicated subsequently.

4- The serial chronological order will not confer any right of seniority. The inter se-seniority of the selectees will be conveyed later -on.

5- Original applications (with enclosures) of the recommendees are enclosed for your record. Please acknowledge receipt.

Yours Faithfully

(Siraj-ud-Din)

Dy: Secy: III

13/12

0. No. 3087
18/12/27



GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

No.SO(LFC)AD-E-I(141)/2015/Vol-IV
Dated Peshawar the 26th Sep,2017

To.

The Director General (Extension)
Livestock & Dairy Development
Khyber Pakhtunkhwa, Peshawar.

Subject:-

COMBINED INTER-SE-SENIORITY OF THE PUBLIC SERVICE
COMMISSION RECOMMENDEES FOR VARIOUS POSTS IN
AGRICULTURE, LIVESTOCK & COOPERATIVES DEPARTMENT ADV:
NO. 01.2014

I am directed to refer to the above captioned subject and to enclose herewith a copy of Assistant Director-III, Khyber Pakhtunkhwa Public Service Commission letter No. PSC/SR-1/97437, dated 08/09/2017 which is self-contained for further necessary action at your end.

(DR. MIR AHMAD KHAN)
SECTION OFFICER

(LIVESTOCK, FISHERIS & COOPERATIVES)

Copy of the above is forwarded to the:-

1. Assistant Director-III, Khyber Pakhtunkhwa Public Service Commission with reference to letter referred to above.
2. PS to Secretary Agriculture Department.

SECTION OFFICER
(LIVESTOCK, FISHERIS & COOPERATIVES)

Ph: 091-9210973

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26/9/17
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**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

13



No. PSC/SR-1/ 97437
Dated: 8/9/2017

To
The Secretary to Govt: of Khyber Pakhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject: COMBINED INTER-SE-SENIORITY OF THE PUBLIC SERVICE
COMMISSION RECOMMENDEES FOR VERIOUS POSTS IN
AGRICULTURE LIVESTOCK & COOPERATIVE DEPARTMENT
ADVT: NO. 01.2014.

Dear Sir,

I have to honors to refer to subject cited above and to forward the combined inter-sc-seniority of the Public Service Commission recommendees against various posts as per detail giving below:-

(Advt:No.01/2014.)

Merit order	Total Marks	Interview marks	D.O.B	Name with Father's Name	Subject	District
1.	69	45	02.04.87	Momin Khan S/O Muzamin Khan	Instructor	Swabi/2
2.	68	44	01.05.87	Shazia Azeem D/O Azecm Khan	Production officer	Karak/4
3.	64	42	16.11.89	Arshia Mussadiq D/O Mussadiq Latif	Production officer	Swat/3
4.	64	40	03.03.87	Akhtar Ali S/O Muzamil	Production officer	Nowshera/2

Error / omission is acceptable for ratification subject to intimation.

Yours faithfully

(ABDUL LATIF)
Assistant Director-III

11.9.35
8-9-17

D.No. 651
21/9/2017

Handwritten signature and initials

Handwritten notes and dates

Phone : 091-9213750, 9213563
Ext : 1038
Website : www.kppsc.gov.pk

**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

14



No. PSC/SR-II/ 074852

Dated: 20-9-16

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject: INTER-SE-MERIT OF VETERINARY OFFICER (HEALTH)
(BPS-17) IN LIVESTOCK & DAIRY DEVELOPMENT
DEPARTMENT (EXTENSION).

Dear Sir,

I am directed to refer to the subject noted above and to state that Inter-Seniority of Veterinary Officer (Health) (BPS-17) General, Women Quota & Disabled Quota recommended by the Commission against (Advertisement No.01/2014, S.No.01, 02 & 03) vide recommendation letter No.PSC-SR-II/010445 dated 09.03.2016, PSC-SR-II/013781 dated 29.03.2016 and PSC-SR-II/015160 dated 15.04.2016 etc is enclosed herewith for your record and necessary action please.

The Department is also required to point out discrepancy, if noticed, within thirty (30) days after the receipt of this letter.

Yours faithfully,

(KAZAL QAYYUM)
ASSISTANT DIRECTOR-III

(Enclosed as above)

So (LPC)
Shi
22/9

AS

Secretary Agriculture
Diary
No. 41363
Dated 20-9-16

Received at
3:40 P.M

D.No. 822
27/9/2016

Subject:

INTER-SE-MERIT TO THE POSTS OF VETERINARY OFFICER
(HEALTH) (B-17) IN LIVESTOCK & DAIRY DEVELOPMENT
DEPARTMENT (EXTENSION WING)

15

(Advt: No.01/2014, S.No.01, 02 & 03)

Merit Order	Interview Marks	D.O.B	Name with Father's Name	Domicile / Zone
1.	71/45	01.03.86	Ihsan Ali S/O Muhammad Ameen	Swat / 3
2.	71/44	15.10.88	Shazia D/O Ziarat Sher (Women Quota)	Mardan/2
3.	70/45	02.04.84	Kamran S/O Muhammad Shamim	Bajaur Agy / 1
4.	69/46	28.01.89	Kalsoom Bibi D/O Amir Shahzada (Women Quota)	Karak/4
5.	69/45	23.03.89	Zardad Khan S/O Imdad Khan	Peshawar / 2
6.	69/43	16.02.87	Anwar Said S/O Itbar Khan	Buner / 3
7.	68/45	30.06.89	Midrar Ullah S/O Fazli Rabbi	Nowshera / 2
8.	68/44	26.07.87	Arbab Ali S/O Mahboob Ali	Kurram Agy / 1
9.	68/43	08.04.85	Naveed Khan S/O Aurang Zeb Khan	Swabi / 2
10.	68/43	01.11.86	Humera Obaid D/O Obaid Ur Rehman (Women Quota)	Nowshera/2
11.	68/42	28.03.90	Arsalan Ali Shah S/O Mian Jahanzaib	Nowshera / 2
12.	68/41	02.02.90	Syed Touseef Hussain Shah S/O Syed Matloob Shah	Abbottabad / 5
13.	67/45	01.04.86	Nasrullah S/O Fazal Qadar	Mardan / 2
14.	67/45	03.01.89	Muhammad Faryal Ahmed S/O Khushdil Khan	Mardan / 2
15.	67/44	15.04.83	Said Amir Jan S/O Mian Zarawar Jan	Swat / 3
16.	67/44	07.03.84	Amjad Ali S/O Sultane Rome	Swat / 3
17.	67/44	07.04.89	Abdul Wahab S/O Burhan-Ud-Din	FR Kohat / 1
18.	67/44	19.04.89	Abdul Ahad S/O Abdul Malik	Mardan / 2
19.	67/42	05.06.83	Fazal Hayan S/O Ashaq	Bajaur Agy / 1
20.	67/40	10.02.88	Shandana Miran D/O Miran Khan (Women Quota)	S.W Agency/1
21.	66/45	01.03.88	Kausar Shaheen D/O Saif-Ul-Islam (Women Quota)	Malakand/3
22.	66/45	03.05.89	Nawaz Sharif S/O Muhammad Sharif	Mardan / 2
23.	66/44	31.07.84	Anwar Ullah S/O Sana Ullah	Mardan / 2
24.	66/44	26.09.84	Inam Ullah Khan S/O Moanber Sharaf	Malakand Agency / 3
25.	66/44	18.03.87	Fida Muhammad Khan S/O Faiz Muhammad Khan	Shangla / 3
26.	66/44	01.08.90	Sher Muhammad S/O Zafar Khan	FR Peshawar / 1
27.	66/43	01.05.85	Mian Saeed Sarwar S/O Lalai Mian	Swat / 3
28.	66/43	01.03.88	Wajid Ali Khan S/O Ali Akbar	Swat / 3
29.	66/43	03.04.89	Zohaib Khan S/O Zahir Ud Din	FR Bannu / 1
30.	66/42	25.03.84	Islam Zeb Khan S/O Nawaz Khan	Lakki Marwat / 4
31.	66/42	16.04.84	Mohammad Riaz Khan S/O Sher Bahadur Khan	Bajaur Agy / 1
32.	66/42	10.02.86	Javed Akbar S/O Noor Gulab	Mardan / 2
33.	66/42	01.05.88	Saima Bibi D/O Abdul Jameel (Women Quota)	Peshawar/2
34.	66/42	12.05.88	Hameed Ali S/O Muhammad Zareen	Mansehra / 5
35.	66/42	02.03.90	Adnan Ali S/O Haji Ali Muhammad	Abbottabad / 5
36.	66/40	22.11.86	Sheikh Muhammad Ansar Azeem S/O Sheikh Muhammad Iqbal	Peshawar / 2
37.	65/45	01.03.86	Syed Zia Ullah Shah S/O Syed Muzarab Shah	Mohmand Agy / 1
38.	65/44	03.03.85	Gultaj Hussain S/O Gulfam Hussain	Orakzai Agy / 1

del
adi
Lahore
University

39.	65/44	13.08.88	Aisha D/O Haji Muhammad Bashir (Women Quota)	Peshawar/2
40.	65/44	03.02.91	Muhammad Jamal S/O Sadbar Khan	Peshawar / 2
41.	65/44	08.04.91	Ikram Ullah S/O Zair Gul	FR Peshawar / 1
42.	65/43	12.02.86	Ajmal Khan S/O Abdur Raziq	Mardan / 2
43.	65/43	01.04.86	Naseer Ahmad S/O Mian Said Room	Swat / 3
44.	65/43	03.04.87	Mazhar Ilyas S/O Mohammad Ilyas	Charsadda / 2
45.	65/43	27.10.87	Wajid Ali Khan S/O Wafa Muhammad	Swat / 3
46.	65/43	09.09.88	Abdul Basit S/O Abdul Khanan	Kohat / 4
47.	65/43	11.03.89	Sagheer Ahmad S/O Wazir Badshah	Nowshera / 2
48.	65/43	04.10.89	Khadim Hussain S/O Mir Azam Khan	Mohmand Agency / 1
49.	65/43	31.12.89	Mehmood Ul Hassan S/O Muhammad Pervez	Mansehra / 5
50.	65/42	05.01.84	Zia Ur Rehman S/O Said Jan	Bajaur Agy / 1
51.	65/42	19.11.87	Hina Ali D/O Muhammad Ali (Women Quota)	Peshawar/2
52.	65/42	04.04.88	Syed Muhammad Sulaiman S/O Syed Bakht Badshah	Bajaur Agy / 1
53.	65/42	14.05.89	Nauman Sadiq S/O Muhammad Sadiq	Abbottabad / 5
54.	65/42	15.02.90	Muslim Ghaffar Khan S/O Abdul Ghaffar Khan	Swat / 3
55.	65/42	16.12.90	Tahir Shah S/O Zahir Shah	Bajaur Agency / 1
56.	65/41	02.01.87	Sami Ullah S/O Sher Azam Khan	Peshawar / 2
57.	65/41	12.03.87	Attaullah S/O Amanullah	Swabi / 2
58.	65/41	02.03.88	Tauqeer Ahsan S/O Abdul Aziz	Mardan / 2
59.	65/41	22.07.89	Amir Shahab S/O Shah Pasand	Charsadda / 2
60.	65/40	20.03.83	Muhammad Arif S/O Muhammad Israr	Peshawar / 2
61.	65/38	30.03.90	Muhammad Shoaib Alam S/O Gul Ra Jan	S.w Agency / 1
62.	64/44	19.03.75	Mahboob Alam S/O Mufeez Ur Rahman	Lower Dir / 3
63.	64/44	11.03.80	Ibrahim Jan S/O Muhammad Rasan	Charsadda / 2
64.	64/44	07.03.88	Baseer Jamal S/O Azad Khan	Charsadda / 2
65.	64/42	15.03.86	Muhammad Jaffar S/O Aman Ullah	Khyber Agy / 1
66.	64/42	05.06.86	Tariq Ahmad S/O Habibul Haq	Swat / 3
67.	64/42	06.10.89	Sarwar Hussain S/O Fazal Khan	Chitral / 3
68.	64/41	12.04.87	Naseeb Ullah Khan S/O Habib Ullah Khan	Bannu / 4
69.	64/40	03.05.88	Muhammad Idrees S/O Aziz Ur Rehman	DI Khan / 4
70.	63/41	18.04.90	Imran Ullah Khan S/O Mir Gulab Khan	Bannu / 4
71.	63/40	11.04.90	Abdul Wadood Jan S/O Abdur Rauf Jan	DI Khan / 4
72.	62/44	04.11.79	Nasir Abbas S/O Muhammad Abbas	Abbottabad / 5
73.	62/43	21.04.80	Zaka Ullah Khan S/O Muhammad Ilyas	Bannu / 4
74.	62/43	11.04.88	Muhammad Tariq S/O Fazal Ur Rehman	DI Khan / 4
75.	62/42	31.05.86	Karwal Khan S/O Awal Khan	Mansehra / 5
76.	61/42	18.01.87	Saad Abdullah S/O Abdullah	Mansehra / 5
77.	60/42	22.02.88	Noor Badshah Khattak S/O Islam Badshah (Disable Quota)	Nowshera/2
78.	60/40	10.01.79	Muhammad Noman S/O Khan Badshah (Disable Quota)	Peshawar/2
79.	60/40	06.09.87	Amin Ul Haq S/O Muhammad Iqbal	Mansehra / 5

(FAZAL QAYYUM)
ASSISTANT DIRECTOR-III

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

CM No. ____/2019

In Re
Appeal No. ____/2018

Dr. Muhammad Zafar**Applicant**

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa
Peshawar & Other**Respondents**

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application		1-2
2.	Affidavit		3
3.	Copy of the Notification dated. 08-07-2009.	"A"	4-6
4.	Copy of the Notification dated. 08-04-2008.	"B"	7-9
5.	Copy of the Letter dated. 14-12-2007.	"C"	10-11
6.	Copy of the Letter dated. 26-09-2017.	"D"	12
7.	Copy of the Letter dated. 08-09-2017.	"E"	13
8.	Copy of the Letter dated. 20-09-2016.	"F"	14
9.	Copy of Interview mark sheet	"G"	15-16

Applicant/Appellant

Through

Naveed Akhtar

Advocate Supreme Court

Cell No. 0300-9596181

Date: 01 /01 /2019

**IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

CM No. ____/2019

In Re
Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa
Peshawar & Other

.....Respondents

**APPLICATION FOR PERMISSION TO
BRING ON RECORD ADDITIONAL
DOCUMENTS FOR JUST AND FAIR
DECISION**

Respectfully Sheweth:

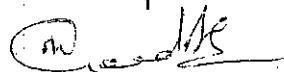
1. That the above titled appeal is pending adjudication before this Honourable Court and fixed for 01-01-2019.
2. That the annexed documents/references are very essential for the perusal of this Honourable Court to arrive at a correct conclusion. Hence, the applicant/appellant wants to place on file on original court file.
 - I. Copy of the Notification dated. 08-07-2009. Annexure "A"
 - II. Copy of the Notification dated. 08-04-2008. Annexure "B"
 - III. Copy of the Letter dated. 14-12-2007. Annexure "C"

- IV. Copy of the Letter dated. 26-09-2017. Annexure "D"
- V. Copy of the Letter dated. 08-09-2017. Annexure "E"
- VI. Copy of the Letter dated. 20-09-2016. Annexure "F"
- VII. Copy of Interview mark sheet . Annexure "G"


It is, therefore, most humbly prayed that on acceptance of this application the applicant may please be granted permission to annex occupying documents on the titled Appeal

Applicant / Appellant
Through

Dated: ____/____/2019


Naveed Akhtar
Advocate Supreme Court


ALTAF SIRAJ
Advocate High Court


Munir ud din Ghori
Advocate

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

CM No. ____/2019

In Re
Appeal No: ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS


Chief Secretary, Government of Khyber Pakhtunkhwa
Peshawar & Other

.....Respondents


AFFIDAVIT

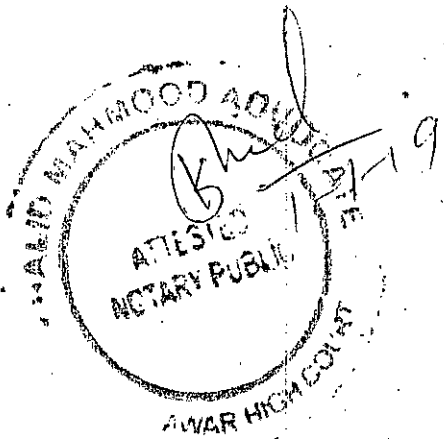
I, Dr. Muhammad Zafar, do hereby solemnly affirm and declare on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identify By


DEPONENT

21201-2258065-1


Naveed Akhtar
Advocate Supreme Court



Rimley
GOVERNMENT OF NWFP
AGRICULTURE, LIVESTOCK & COOPERATIVE
DEPARTMENT

4

Dated Peshawar the July 8, 2009

NOTIFICATION

No. SO (L&DD) AD-E-1(236)/2008/Ext. 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) Rule, 1989, the Agriculture, Livestock and Cooperatives Department, in consultation with the Establishment Department and the Finance Department hereby direct that in this department's Notification No. SO(L&DD)AD-E-1(236)/2006/Ext, dated 26.6.2007, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix, for Part-I, the following shall be substituted, namely:

PART-I
PROFESSIONAL STAFF

S.No	Nomenclature of the Post	Qualifications For Appointment By Initial Recruitment	Age Limit	Method of Recruitment
1	2	3	4	5
1.	Director General Livestock and Dairy Development Department NWFP/Principal Animal Husbandry In-service Training Institute (AHITI) NWFP (BPS-20)	-----	-----	By selection on merit from amongst Directors/ Epidemiologists/Principal Veterinary Officers/ Executive District Officer (Agri)/ Training Coordinator AHITI/Wool Analyst having 10 years service in BPS-18 and above or having seventeen year service in BPS-17 and above and Registered with Pakistan Veterinary Medical Council.
2.	Director/ Epidemiologist/ Principal Veterinary Officers/ Executive District Officer (Agri)/Training Coordinator AHITI/ Wool Analyst (BPS-19)	-----	-----	By promotion on the basis of seniority-cum-fitness from amongst District Livestock Officers / Agency Livestock Officer /Deputy Directors/Senior Veterinary Officer /Senior Instructor /Deputy Epidemiologists/ Sheep Development Officers/ Livestock Economists having seven years service in BPS-18 or having twelve years service in BPS-17 and above and registered with Pakistan Veterinary Medical

District Livestock
Officers/ Agency
Livestock
Officers/ Deputy
Officers (Senior
Veterinary Officers /
Senior Instructor
AI/IT/ Deputy
Epidemiologist/
Sheep Development
Officer
(DPS-14)

by promotion on the
basis of seniority and
fitness, from amongst
Veterinary Officer (I-I),
Laboratory Manager/
Semen Distribution
Officer / Female
Veterinary Officers/
Livestock Production
Officers / Sheep
Development / Instructor
/ Cattle Development
Inspector/ Instructor/
Field Dairy Assistant/
Agrostologist/ Livestock
Manager/ Female
Instructor/ Female
Programme
Coordinators, with five
years service in DPS-17
and registered with
Pakistan Veterinary
Medical Council
By initial recruitment

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Livestock Economist
(DPS-18)

(i) Master Degree
in Agriculture
Economics /
Economics;
OR
(ii) Master in Business
Administration with
basic Degree of
PVM/B.Sc (Hons)
AI-I, from recognized
university with five
years experience in
Government/ Semi
Govt organization
in the relevant field
and registered with
Pakistan Veterinary
Medical Council.

30 to
35
years

Veterinary Officer
(I-I) / Laboratory
Manager/ Semen
Distribution Officer/
Female Veterinary
Officer
(BPS-17)

Doctor of Veterinary
Medicine (DVM)
OR
equivalent qualification in
Veterinary Sciences from
recognized university
and Registered with
Pakistan Veterinary
Medical Council

22 to
36
years

By initial recruitment

Director Livestock & Sheep Dept
Govt of K...

Livestock Production
Officer/ Sheep
Development
Inspector/ Cattle
Development
Inspector/ Instructor/
Field Dairy
Assistant/
Agrostologist / Live
stock Manager/
Female Instructor/
Female Programme
Coordinator
(BPS-17)

(i) B.Sc (Hons) Animal
Husbandry from a
recognized
university;
OR
(ii) Doctor of Veterinary
Medicine (DVM) or
equivalent
qualification in
Veterinary Sciences
from a recognized
university and
registered with
Pakistan Veterinary
Medical Council

22 to
35
years

By initial recruitment

Director IHC
Livestock & Sheep Dept
Govt of K...

Director IHC
Livestock & Sheep Dept
Govt of K...

7.	Veterinary Supervisor (Male/Female) (BPS-11)		---	By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Veterinary Assistants (Male/Female) with ten years service in BPS-6 and above.
8.	Senior Veterinary Assistant (Male/Female) (BPS-9)		---	By promotion on the basis of seniority-cum-fitness from amongst the Veterinary Assistants (Male/Female) having seven years service as such.
9.	Veterinary Assistant (Male/Female) (BPS-6)	(a) Secondary School Certificate from a recognized board; and (b) Two years Veterinary Assistant training certificate from a recognized Training Institute.	18 to 32 Years	By initial recruitment

(Handwritten Signature)

(ATTAULLAH KHAN)
SECRETARY TO GOVT. OF NWFP
AGRICULTURE, LIVESTOCK & COOPERATIVES
DEPARTMENT

Endst. No & Date even.

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

1. Secretary to Government of NWFP, Establishment and Administration Department Peshawar.
2. Secretary to Government of NWFP, Finance Department Peshawar.
3. Secretary to Government of NWFP, Law, Parliamentary Affairs & Human Rights Department w/r to his letter No. REG:1(6)/1976/4398 dated 13.05.2009.
4. Director Recruitment, NWFP Public Service Commission, 2-Fort Road Peshawar Cantt. Peshawar
5. Director General (Extension), Livestock & Dairy Development, NWFP Peshawar.
6. PSO to Chief Minister NWFP.
7. PSO to Chief Secretary NWFP.
8. Manager, Government Printing Press, NWFP Peshawar. He is requested that printed (preferable gazette) copies of the notification as and when published may be furnished to this Department, Finance, Establishment and Law Departments along with details of gazette in which it is published.
9. PS to Minister for Livestock and Cooperative Department NWFP.
10. PS to Secretary Agriculture, Livestock and Cooperative Department.

(Handwritten Signature)
(DR. MIR AHMAD KHAN)
SECTION OFFICER (L&DD)

AGRICULTURE, LIVESTOCK & COOPERATION
DEPARTMENT PESHAWAR

Dated Peshawar the April 8, 2008

ANNEX - 8

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NOTIFICATION

No.SO(L&DD)AD-E-1(141)/2008/KC.

Consequent upon recommendation of the NWFP Public Service Commission, the competent authority is pleased to appoint the following as Veterinary Officer (Health) in BS-17 (Rs.8210-615-20510 plus usual allowances as admissible under the rules) on regular basis with immediate effect under the provision of Government of NWFP Establishment & Administration Department circular bearing No.SOR-6(E&AD)13-1/2005 dated 10.8.2005:-

1. Dr. Akbar Ali S/O Mr.Mutabar Khan Village, Safari P/O Timergara Tehsil Bularnabat District Dir (Lower).
2. Dr. Haq Amanullah S/O Mr.Akhtar Ali Khan Village & P/O Paloski Tehsil Takht Nasrati, District Karak
3. Dr. Muhammad Ubaidullah Qureshi S/O Mr.Muhammad Jamalullah Qureshi, Village & P/O Totalai, Mohalla Qazi Abul District Buner Via Sawabi
- ✓ 4. Dr. Muhammad Zafar S/O Muhammad Naseem, Kotka Abdul Qadir Shah Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu
- ✓ 5. Dr. Muhammad Tufail S/O Mr. Muhammad Bashir House No.845, Sector D/4, Street No.35 Phase No.1, Hayatabad, Peshawar
6. Dr. Hasham Khan S/O Dr. Ijaz Ahmad Village & P/O Mirpur, Tehsil & District Haripur
7. Dr. Rahit Ali S/O Mr.Daulat Mand Village & P/O Fatehpur Tehsil & District Swat
8. Dr. Saeed Khan S/O Mr.Abdur Rahman Village & P/O Jalala, Tehsil Takht Bhai District Mardan
9. Dr. Zia Ur Rahman S/O Shamsur Rahman Village & P/O Totalai Mohalla Jaffar Khail District Buner
10. Dr. Muhammad Ilyas Afridi S/O Mr.Shae Muhammad Afridi Mohalla Sharat-Khel Kohi Hassan, Khel F R Peshawar
11. Dr. Aziz Ahmad S/O Mr.Attaullah Village & P/O Kokarai, Tehsil Saidu Sharif District Swat
12. Dr. Attiq Rahman S/O Mr.Haji Habib ur Rahman Village & P/O Ghoriwala Tehsil & District Bannu

2. On their appointment, they are hereby posted/adjusted on the following posts mentioned against their names, subject to the terms & conditions given below.

Sl.No.	Name of Officer	Place of posting	Remarks
1.	Dr. Akbar Ali	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Khal District Dir Lower	Against vacant post.
2.	Dr. Haq Amanulla	Veterinary Officer (H) In-charge Civil Veterinary Hospital Latambar District Karak	--do--
3.	Dr. Muhammad Ubaid Ullah Qureshi	Veterinary Officer (H) In-charge Civil Veterinary Hospital Topi District Swabi	--do--
4.	Dr. Muhammad Zafar	Veterinary Officer (H) In-charge Civil Veterinary Hospital Nahaqi District Peshawar	--do--

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5.	Dr. Muhammad Tufail	Additional Veterinary Officer Civil Veterinary Hospital Peshawar	Against vacant post
6.	Dr. Hashim Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Baffa District Manselhra	--do--
7.	Dr. Rahat Ali	Veterinary Officer (Health) In-charge Artificial Insemination Center Saidu Sharif Swat	--do--
8.	Dr. Saeed Khan	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dheri Jolagram, Malakand Agency	--do--
9.	Dr. Zia-Ur-Rahman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Dhodher Chowk District Swabi	--do--
10.	Dr. Aziz Ahmad	Veterinary Officer (Health) In-charge Civil Veterinary Hospital Pufan District Shangla	
11.	Dr. Attiq-ur-Rehman	Veterinary Officer (Health) In-charge Civil Veterinary Hospital, Titer Khet District Lakki Marwat	--do--
12.	Dr. Muhammad Ilyal Afridi	His services are placed at the disposal of Civil Secretariat FATA.	The officer may further be adjusted against vacant post of Veterinary Officer (Health) in the Livestock and Dairy Development Department, FATA

TERMS AND CONDITIONS.

- i. Their services will be considered regular but without pension or Gratuity in term of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to contributory Provident Fund in such a manner and at such rates as may be prescribed by the Government.
- ii. Their services will be liable to termination on one month's notice from either side. In case of resignation without notice, their two month's pay/allowances shall be forfeited to Government.
- iii. The appointee should join their post within 30-days of the issue of this notification. The Director Livestock and Dairy Development NWFP would furnish a certificate to the effect that the candidates have joined the post or otherwise, after one month of issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- iv. They will be on probation for a period of two years extendable for another one year.
- v. They will be governed under such rules and regulations as may be issued from time to time by the Government.
- vi. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against the NWFP Removal from Services (Special Powers) Ordinance, 2000 and the Rules framed from time to time.

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- vii. Charge report should be submitted by all concerned.
- viii. No TA/DA will be allowed to the appointees for joining their duty.

Sd/-
SECRETARY AGRICULTURE

Endst. No. & Date even.

Copy forwarded to:

1. The Accountant General, NWFP Peshawar.
- ✓ 2. The Director, Livestock and Dairy Development NWFP Peshawar.
3. Section Officer (Estt) Civil Secretariat HATA Warsak Road Peshawar for information and further necessary action.
- 4-11. The District Accounts Officers, Dir Lower, Karak, Swabi, Manshara, Swat, Malakand, Shangla and Lakki Marwat.
12. The Manager, Government Printing Press, NWFP Peshawar.
- ✓ 13. Officers concerned.
14. Personal file.
15. P.S to Chief Secretary, NWFP.


(NAEM MULLAH)
Section Officer (L & DD)

Telephone: 9217650

Recommendation
of Dr. Zafar



From: Secretary,
NWFP Public Service Commission,
Scouts Building, Phase-IV, Near Police Station,
Hayatabad, Peshawar.

To: The Secretary to Govt: of NWFP
Agriculture, Livestock and Coop: Department,
Peshawar.

No. / 51182

Dated 14/12/07

Subject:- Rectt: of Twenty Veterinary Officers Health (B-17) in L & DD
Department

Dear Sir,

I am directed to refer to your letter No.SO(L&DD)AD-E-1(141)2003 dated 27.03.2007 on the subject noted above and to state that the Commission recommends the following to the Govt: for appointment for the subject cited posts.

Sr No	Name with Father Name	Domicile/Zone
1.	Akbar Ali S/O Mutabar Khan	Dir/3
2.	Haq Aman Ullah S/O Akhtar Ali Khan	Karak/4
3.	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Buner/3
4.	Muhammad Zafar S/O Muhammad Naseem	Bannu/4
5.	Muhammad Tufail S/O Muhammad Bashir	Bannu/4
6.	Hashim Khan S/O Dr. Ijaz Ahmad	Haripur/5
7.	Rahat Ali S/O Daulat Mand	Swat/3
8.	Saeed Khan S/O Abdur Rehman	Mardan/2
9.	Zia-ur-Rehman S/O Shams-ur-Rehman	Buner/3
10.	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	F.R Pes
11.	Aziz Ahmad S/O Atta Ullah	Swat/3
12.	Attiq ur Rehman S/O Haji Habib ur Rehman	Bannu/4

Recommendations in favour of the recommendees are provisional subject to their medical fitness.

3- Recommendation in favour of Eight candidates have been kept pending and will be communicated subsequently.

4- The serial chronological order will not confer any right of seniority. The inter se-seniority of the selectees will be conveyed later -on.

5- Original applications (with enclosures) of the recommendees are enclosed for your record. Please acknowledge receipt.

Yours Faithfully

(Siraj-ud-Din)

Dy: Secy: III

13/12

0. W. 3087
18/12/27



GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

No.SO(LFC)AD-E-I(141)/2015/Vol-IV
Dated Peshawar the 26th Sep,2017

To

The Director General (Extension)
Livestock & Dairy Development
Khyber Pakhtunkhwa, Peshawar.

Subject:- COMBINED INTER-SE-SENIORITY OF THE PUBLIC SERVICE
COMMISSION RECOMMENDEES FOR VARIOUS POSTS IN
AGRICULTURE, LIVESTOCK & COOPERATIVES DEPARTMENT ADV:
NO. 01.2014

I am directed to refer to the above captioned subject and to enclose
herewith a copy of Assistant Director-III, Khyber Pakhtunkhwa Public Service
Commission letter No. PSC/SR-1/97437, dated 08/09/2017 which is self-contained
for further necessary action at your end.

(DR. MIR AHMAD KHAN)
SECTION OFFICER

(LIVESTOCK, FISHERIS & COOPERATIVES)

Copy of the above is forwarded to the:-

1. Assistant Director-III, Khyber Pakhtunkhwa Public Service Commission
with reference to letter referred to above.
2. PS to Secretary Agriculture Department.

SECTION OFFICER
(LIVESTOCK, FISHERIS & COOPERATIVES)
Ph: 091-9210973

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26/9/17
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VD E
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26/9/17

**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

13



No. PSC/SR-1/ 97437

Dated: 8/9/2017

To
The Secretary to Govt: of Khyber Pakhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject: COMBINED INTER-SE-SENIORITY OF THE PUBLIC SERVICE
COMMISSION RECOMMENDEES FOR VERIOUS POSTS IN
AGRICULTURE LIVESTOCK & COOPERATIVE DEPARTMENT
ADVT: NO. 01.2014.

Dear Sir,

I have to honors to refer to subject cited above and to forward the combined inter-sc-seniority of the Public Service Commission recommendees against various posts as per detail giving below:-

(Advt:No.01/2014.)

Merit order	Total Marks	Interview marks	D.O.B	Name with Father's Name	Subject	District
1.	69	45	02.04.87	Momin Khan S/O Muzamin Khan	Instructor	Swabi/2
2.	68	44	01.05.87	Shazia Azeem D/O Azecm Khan	Production officer	Karak/4
3.	64	42	16.11.89	Arshia Mussadiq D/O Mussadiq Latif	Production officer	Swat/3
4.	64	40	03.03.87	Akhtar Ali S/O Muzamil	Production officer	Nowshera/2

Error / omission is acceptable for ratification subject to intimation.

Yours faithfully

(ABDUL LATIF)
Assistant Director-III

30/E

Secretary Agriculture
11.9.35
8-9-17

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S/O (LEAT)
14/9/17

D.No. 651
21/9/2017

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Phone : 091-9213750, 9213563
Ext : 1038
Website : www.kppsc.gov.pk

**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

14



No. PSC/SR-II/ 074852
Dated: 20-9-16

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject: INTER-SE-MERIT OF VETERINARY OFFICER (HEALTH)
(BPS-17) IN LIVESTOCK & DAIRY DEVELOPMENT
DEPARTMENT (EXTENSION).

Dear Sir,

I am directed to refer to the subject noted above and to state that Inter-Seniority of Veterinary Officer (Health) (BPS-17) General, Women Quota & Disabled Quota recommended by the Commission against (Advertisement No.01/2014, S.No.01, 02 & 03) vide recommendation letter No.PSC-SR-II/010445 dated 09.03.2016, PSC-SR-II/013781. dated 29.03.2016 and PSC-SR-II/015160 dated 15.04.2016 etc is enclosed herewith for your record and necessary action please.

The Department is also required to point out discrepancy, if noticed, within thirty (30) days after the receipt of this letter.

(Enclosed as above)

Yours faithfully,


(MAZAL QAYYUM)
ASSISTANT DIRECTOR-III

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AS
Secretary Agriculture
Diary
No. 4363
Dated 20-9-16

Received at
3:40 P.M

D.No. 822
27/9/2016

Subject: INTER-SE-MERIT TO THE POSTS OF VETERINARY OFFICER (HEALTH) (B-17) IN LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT (EXTENSION WING)

15

(Advt: No.01/2014, S.No.01, 02 & 03)

Merit Order	Interview Marks	D.O.B	Name with Father's Name	Domicile / Zone
1.	71/45	01.03.86	Ihsan Ali S/O Muhammad Ameen	Swat / 3
2.	71/44	15.10.88	Shazia D/O Ziarat Sher (Women Quota)	Mardan/2
3.	70/45	02.04.84	Kamran S/O Muhammad Shamim	Bajaur Agy / 1
4.	69/46	28.01.89	Kalsoom Bibi D/O Amir Shahzada ((Women Quota)	Karak/4
5.	69/45	23.03.89	Zardad Khan S/O Imdad Khan	Peshawar / 2
6.	69/43	16.02.87	Anwar Said S/O Itbar Khan	Buner / 3
7.	68/45	30.06.89	Midrar Ullah S/O Fazli Rabbi	Nowshera / 2
8.	68/44	26.07.87	Arbab Ali S/O Mahboob Ali	Kurram Agy / 1
9.	68/43	08.04.85	Naveed Khan S/O Aurang Zeb Khan	Swabi / 2
10.	68/43	01.11.86	Humera Obaid D/O Obaid Ur Rehman (Women Quota)	Nowshera/2
11.	68/42	28.03.90	Arsalan Ali Shah S/O Mian Jahanzaib	Nowshera / 2
12.	68/41	02.02.90	Syed Touseef Hussain Shah S/O Syed Matloob Shah	Abbottabad / 5
13.	67/45	01.04.86	Nasrullah S/O Fazal Qadar	Mardan / 2
14.	67/45	03.01.89	Muhammad Faryal Ahmed S/O Khushdil Khan	Mardan / 2
15.	67/44	15.04.83	Said Amir Jan S/O Mian Zarawar Jan	Swat / 3
16.	67/44	07.03.84	Amjad Ali S/O Sultane Rome	Swat / 3
17.	67/44	07.04.89	Abdul Wahab S/O Burhan-Ud-Din	FR Kohat / 1
18.	67/44	19.04.89	Abdul Ahad S/O Abdul Malik	Mardan / 2
19.	67/42	05.06.83	Fazal Hayan S/O Ashaq	Bajaur Agy / 1
20.	67/40	10.02.88	Shandana Miran D/O Miran Khan (Women Quota)	S.W Agency/1
21.	66/45	01.03.88	Kausar Shaheen D/O Saif-Ul-Islam (Women Quota)	Malakand/3
22.	66/45	03.05.89	Nawaz Sharif S/O Muhammad Sharif	Mardan / 2
23.	66/44	31.07.84	Anwar Ullah S/O Sana Ullah	Mardan / 2
24.	66/44	26.09.84	Inam Ullah Khan S/O Moanber Sharaf	Maiakand Agency / 3
25.	66/44	18.03.87	Fida Muhammad Khan S/O Faiz Muhammad Khan	Shangla / 3
26.	66/44	01.08.90	Sher Muhammad S/O Zafar Khan	FR Peshawar / 1
27.	66/43	01.05.85	Mian Saeed Sarwar S/O Lalai Mian	Swat / 3
28.	66/43	01.03.88	Wajid Ali Khan S/O Ali Akbar	Swat / 3
29.	66/43	03.04.89	Zohaib Khan S/O Zahir Ud Din	FR Bannu / 1
30.	66/42	25.03.84	Islam Zeb Khan S/O Nawaz Khan	Lakki Marwat / 4
31.	66/42	16.04.84	Mohammad Riaz Khan S/O Sher Bahadur Khan	Bajaur Agy / 1
32.	66/42	10.02.86	Javed Akbar S/O Noor Gulab	Mardan / 2
33.	66/42	01.05.88	Saima Bibi D/O Abdul Jameel (Women Quota)	Peshawar/2
34.	66/42	12.05.88	Hameed Ali S/O Muhammad Zareen	Mansehra / 5
35.	66/42	02.03.90	Adnan Ali S/O Haji Ali Muhammad	Abbottabad / 5
36.	66/40	22.11.86	Sheikh Muhammad Ansar Azeem S/O Sheikh Muhammad Iqbal	Peshawar / 2
37.	65/45	01.03.86	Syed Zia Ullah Shah S/O Syed Muzarab Shah	Mohmand Agy / 1
38.	65/44	03.03.85	Gultaj Hussain S/O Gulfam Hussain	Orakzai Agy / 1

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(16)

39.	65/44	13.08.88	Aisha D/O Haji Muhammad Bashir (Women Quota)	Peshawar/2
40.	65/44	03.02.91	Muhammad Jamal S/O Sadbar Khan	Peshawar / 2
41.	65/44	08.04.91	Ikram Ullah S/O Zair Gul	FR Peshawar / 1
42.	65/43	12.02.86	Ajmal Khan S/O Abdur Raziq	Mardan / 2
43.	65/43	01.04.86	Naseer Ahmad S/O Mian Said Room	Swat / 3
44.	65/43	03.04.87	Mazhar Ilyas S/O Mohammad Ilyas	Charsadda / 2
45.	65/43	27.10.87	Wajid Ali Khan S/O Wafa Muhammad	Swat / 3
46.	65/43	09.09.88	Abdul Basit S/O Abdul Khanan	Kohat / 4
47.	65/43	11.03.89	Sagheer Ahmad S/O Wazir Badshah	Nowshera / 2
48.	65/43	04.10.89	Khadim Hussain S/O Mir Azam Khan	Mohmand Agency / 1
49.	65/43	31.12.89	Mehmood Ul Hassan S/O Muhammad Pervez	Mansehra / 5
50.	65/42	05.01.84	Zia Ur Rehman S/O Said Jan	Bajaur Agy / 1
51.	65/42	19.11.87	Hina Ali D/O Muhammad Ali (Women Quota)	Peshawar/2
52.	65/42	04.04.88	Syed Muhammad Sulaiman S/O Syed Bakht Badshah	Bajaur Agy / 1
53.	65/42	14.05.89	Nauman Sadiq S/O Muhammad Sadiq	Abbottabad / 5
54.	65/42	15.02.90	Muslim Ghaffar Khan S/O Abdul Ghaffar Khan	Swat / 3.
55.	65/42	16.12.90	Tahir Shah S/O Zahir Shah	Bajaur Agency / 1
56.	65/41	02.01.87	Sami Ullah S/O Sher Azam Khan	Peshawar / 2
57.	65/41	12.03.87	Attaullah S/O Amanullah	Swabi / 2
58.	65/41	02.03.88	Tauqeer Ahsan S/O Abdul Aziz	Mardan / 2
59.	65/41	22.07.89	Amir Shahab S/O Shah Pasand	Charsadda / 2
60.	65/40	20.03.83	Muhammad Arif S/O Muhammad Israr	Peshawar / 2
61.	65/38	30.03.90	Muhammad Shoaib Alam S/O Gul Ra Jan	S.w Agency / 1
62.	64/44	19.03.75	Mahboob Alam S/O Mufeez Ur Rahman	Lower Dir / 3.
63.	64/44	11.03.80	Ibrahim Jan S/O Muhammad Rasan	Charsadda / 2
64.	64/44	07.03.88	Baseer Jamal S/O Azad Khan	Charsadda / 2
65.	64/42	15.03.86	Muhammad Jaffar S/O Aman Ullah	Khyber Agy / 1
66.	64/42	05.06.86	Tariq Ahmad S/O Habibul Haq	Swat / 3
67.	64/42	06.10.89	Sarwar Hussain S/O Fazal Khan	Chitral / 3
68.	64/41	12.04.87	Naseeb Ullah Khan S/O Habib Ullah Khan	Bannu / 4
69.	64/40	03.05.88	Muhammad Idrees S/O Aziz Ur Rehman	DI Khan / 4
70.	63/41	18.04.90	Imran Ullah Khan S/O Mir Gulab Khan.	Bannu / 4
71.	63/40	11.04.90	Abdul Wadood Jan S/O Abdur Rauf Jan	DI Khan / 4
72.	62/44	04.11.79	Nasir Abbas S/O Muhammad Abbas	Abbottabad / 5
73.	62/43	21.04.80	Zaka Ullah Khan S/O Muhammad Ilyas	Bannu / 4
74.	62/43	11.04.88	Muhammad Tariq S/O Fazal Ur Rehman	DI Khan / 4
75.	62/42	31.05.86	Kanwal Khan S/O Awal Khan	Mansehra / 5.
76.	61/42	18.01.87	Saad Abdullah S/O Abdullah	Mansehra / 5
77.	60/42	22.02.88	Noor Badshah Khattak S/O Islam Badshah (Disable Quota)	Nowshera/2
78.	60/40	10.01.79	Muhammad Noman S/O Khan Badshah (Disable Quota)	Peshawar/2
79.	60/40	06.09.87	Amin Ul Haq S/O Muhammad Iqbal	Mansehra / 5

(FAZAL QAYYUM)
ASSISTANT DIRECTOR-III

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Impleadment Application No. ____/2019

In Re

Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents


I N D E X

S. No.	Description of Documents	Annex	Pages
1.	Impleadment Application		1 - 2
2.	Affidavit		3


Applicants

Through

Dated: 01/01/2019


Naveed Akhtar
Advocate Supreme Court
Cell No. 0300-9596181


ALTAF SIRAJ
Advocate High Court

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Impleadment Application No. ____/2019

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IN THE COURT OF SERVICE TRIBUNAL, KHYBER
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Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents

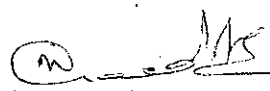
I N D E X

S. No.	Description of Documents	Annex	Pages
1.	Impleadment Application		1 - 2
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Applicants

Through

Dated: 01/01/2019


Naveed Akhtar
Advocate Supreme Court
Cell No. 0300-9596181


ALTAF SIRAJ
Advocate High Court

①

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Impleadment Application No. ____/2019

In Re

Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents

APPLICATION FOR IMPLEADMENT OF THE
KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION THROUGH ITS CHAIRMAN ,
DR. ABBAS ALI AND DR. INAM ULLAH KHAN
AS RESPONDENTS NO. 5 TO 7 IN THE ARRAY
OF RESPONDENTS BEING NECESSARY
PARTIES.

Respectfully Sheweth:

1. That the above titled appeal is pending before this Honourable Court and is fixed for hearing on 01.01.2019.
2. That the applicant pray for impleadment of :-
 - i. Khyber Pakhtunkhwa Public Service Commission through its Chairman,
 - ii. Dr. Abbas Ali S/o Munawar Khan, Veterinary Officer (BPS-17) Civil Veterinary Hospital Peshawar

iii. Dr. Inam Ullah S/o Saad Ullah Khan, Assistant Director Live Stock District Kurram.

in the above titled appeal as respondents inter alia on the following grounds;

GROUND:-


- A. That the applicant/ appellant has challenged the seniority list in which the above cited private respondents have been placed senior to the appellant.
- B. That since the seniority has been determined as per the list furnished by the worthy Khyber Pakhtunkhwa Public Service Commission, therefore, the KP Public Service commission is also a necessary party and is requested to be arrayed as respondent through its Chairman.

It is therefore, humbly prayed that the above mentioned parties in para 2 (roman i to iii) may kindly be impleaded as necessary parties in the array of respondents.

Applicant/appellant

Through

Dated: 01/01/2019


Naveed Akhtar
Advocate Supreme Court

&


ALTAF SIRAJ
Advocate High Court

**IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Impleadment Application No. ____/2019

In Rè

Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents

AFFIDAVIT

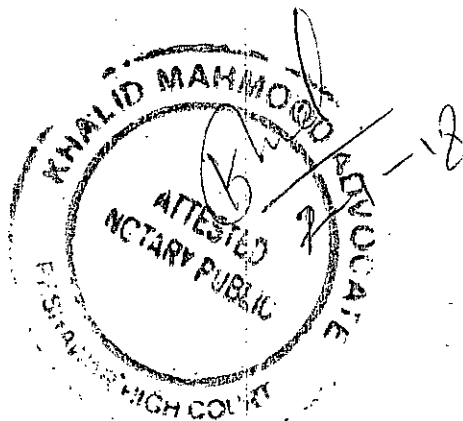
I, Dr. Muhammad Zafar, do hereby solemnly affirm and declare that
the contents of the Impleadment Application are true and correct to
the best of my knowledge and belief and nothing has been concealed
from this Hon'ble Court

Identified By

DÉPONENT

CNIC # 21201-2258065-1

**Naveed Akhtar
Advocate Supreme Court**



IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Impleadment Application No. ____/2019

In Re

Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant


VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents


I N D E X

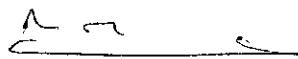
S. No.	Description of Documents	Annex	Pages
1.	Impleadment Application		1 - 2
2.	Affidavit		3


Applicants

Through

Dated: 01/01/2019


Naveed Akhtar
Advocate Supreme Court
Cell No. 0300-9596181


ALTAF SIRAJ
Advocate High Court

①

IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Impleadment Application No. ____/2019

In Re

Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents

APPLICATION FOR IMPLEADMENT OF THE
KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION THROUGH ITS CHAIRMAN ,
DR. ABBAS ALI AND DR. INAM ULLAH KHAN
AS RESPONDENTS NO. 5 TO 7 IN THE ARRAY
OF RESPONDENTS BEING NECESSARY
PARTIES.

Respectfully Sheweth:

1. That the above titled appeal is pending before this Honourable Court and is fixed for hearing on 01.01.2019.
2. That the applicant pray for impleadment of :-
 - i. Khyber Pakhtunkhwa Public Service Commission through its Chairman,
 - ii. Dr. Abbas Ali S/o Munawar Khan, Veterinary Officer (BPS-17) Civil Veterinary Hospital Peshawar


iii. Dr. Inam Ullah S/o Saad Ullah Khan, Assistant Director
Live Stock District Kurram.

in the above titled appeal as respondents inter alia on the
following grounds;

GROUND:-

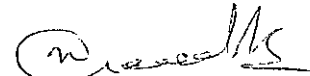
- A. That the applicant/ appellant has challenged the seniority list in which the above cited private respondents have been placed senior to the appellant.
- B. That since the seniority has been determined as per the list furnished by the worthy Khyber Pakhtunkhwa Public Service Commission, therefore, the KP Public Service commission is also a necessary party and is requested to be arrayed as respondent through its Chairman.

It is therefore, humbly prayed that the above mentioned parties in para 2 (roman i to iii) may kindly be impleaded as necessary parties in the array of respondents.


Applicant/appellant

Through

Dated: 01/01/2019


Naveed Akhtar
Advocate Supreme Court

&


ALTAF SIRAJ
Advocate High Court

**IN THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Impleadment Application No. ____/2019

In Re

Appeal No. ____/2018

Dr. Muhammad Zafar

.....Applicant

VERSUS

Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar &
Other

.....Respondents

AFFIDAVIT

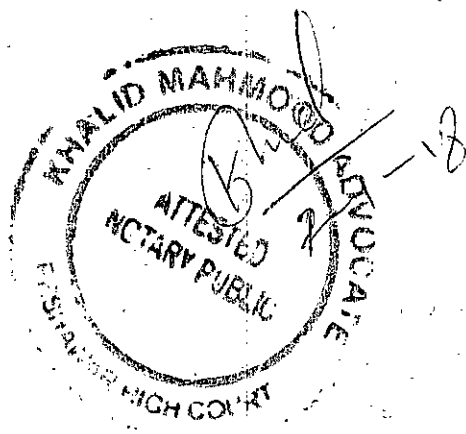
I, Dr. Muhammad Zafar, do hereby solemnly affirm and declare that the contents of the Impleadment Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court

Identified By

DEPONENT

CNIC # 21201-2258065-1

**Naveed Akhtar
Advocate Supreme Court**



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1205/2018

Dr. Muhammad Zafar Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others Respondents

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Civil Miscellaneous application		1-2
2.	Affidavit		3
3.	Copy of Order Dated 05-08-2019		4-5

put up to the court with
relevant app. no.

~~ew~~
8/3/2021.

Lawyer.

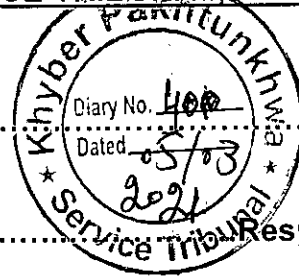


Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1205 / 2018

Dr. Muhammad Zafar.....



Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others.....


Respondents

Subject: APPLICATION FOR SETTING ASIDE THE ORDER DATED 05-08-2019
WHEREIN RIGHT OF THE RESPONDENTS TO FILE COMMENTS HAS
BEEN FORFEITED.


Respectfully Sheweth:

- (1) That the instant appeal was fixed for hearing before this honorable tribunal on 11-12-2020.
- (2) That reply / comments of Respondent No. 04 and 05 i.e. Director and Chairman, Khyber Pakhtunkhwa Public Service Commission was not submitted due to refusal of the Reader to entertain the same without Honorable Tribunal formal order in this regard.
- (3) That this honorable tribunal was pleased to pass the order dated 05.08.2019, "***On the last date of hearing, the respondent No. 4 and 5 were allowed last chance for submission of written reply, today which they failed to. To come up for arguments on 26.09.2019 before D.B.***"
- (4) That the replying respondents humbly submit as under:-
 - (a) That the respondents failed to file the written reply due to lack of proper communication. As a matter of fact, the Public Service Commission was subsequently impleaded and was not included in the original panel of the respondents.
 - (b) That the replying respondents were unaware of the last chance given by this honorable tribunal for filing comments. The Commission recently received copies of the order sheets.
 - (c) That the perusal of the reply / comments of the Respondent No. 04 and 05 by the honorable Service Tribunal is necessary for proper assistance and a just and proper decision of the instant case.

It is therefore humbly requested that the order wherein right of the respondents to file comments has been forfeited, may graciously be set aside and the respondents may be allowed / permitted to file their written reply.


DIRECTOR RECRUITMENT
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.04)


Shahid


CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.05)

AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

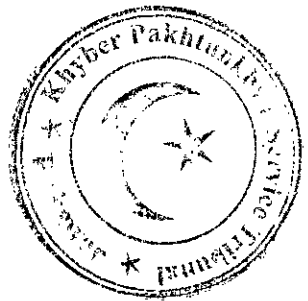
DEPONENTS


**DIRECTOR RECRUITMENT
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.04)**

4

(4)

BEFORE THE LEARNED
SERVICE TRIBUNAL, PESHAWAR



Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1205 /2018

Diary No. 1478

Dated 27/9/11

Dr. Mohammad Zafar, Veterinary Officer (H) Director General
(Extension) Livestock and Dairy Development, KPK Peshawar
(Appellant)

V E R S U S

- ✓1) Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar
- ✓2) Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar Agricultural, Livestock, Fisheries and Cooperative Department, Peshawar
- 3) Director General (Extension Live Stock and Dairy Development Department) KPK, Peshawar
- 4) Director, Khyber Pakhtunkhwa Public Service Commission
- 5. Khyber Pakhtunkhwa Public Service Commission through its Chairman.
- 6- Dr. Abbas Ali s/o Munawar Khan, Veterinary officer BPS-17 (Respondents) Civil Veterinary Hospital Peshawar
- 7- Dr. Inamullah s/o Saad ullah Khan, Assistant Director Live stock District Kurram.

*5, 6, 7
Imp. leaded as Respondents
vide order sheet date 1-1-19.*

Filed to-day Service Appeal Under Section 04 of the Service
Registrar Tribunal Act, whereby the combined inter-se-
27/9/11 seniority of veterinary officers, instructors, sheep
development inspector and agrostologist issued on
02.11.2010 has been kept intact vide Letter No.
PSC/SR-1/09984 dated 05.04.2018 issued by the
respondent No. 4 is illegal by all aspect and require
to rectified.

Re-submitted to -day
and filed.

Registrar

[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

5

20.06.2019

Appellant in person, Mr. Kabirullah Khattak, Additional AG for official respondents and counsel for private respondents No. 6 & 7 present. Written reply on behalf of official respondents No. 1 to 3 has already been submitted. Learned counsel for private respondents No. 6 & 7 submitted written reply today. None present on behalf of respondents No. 4 & 5 therefore, notice be issued to them to submit written reply on the next date by way of last chance. Case to come up for written reply/comments on behalf of respondents No. 4 & 5 on 05.08.2019 before S.B.

MA
(Muhammad Amin Khan Kundi)
Member

05.08.2019

Nemo for appellant. Mr. Muhammad Jan, DDA for official respondents no. 1 to 5 and counsel for private respondents No. 6 and 7 present.

On the last date of hearing, the respondents No. 4 and 5 were allowed last chance for submission of written reply, today which they failed to.

To come up for arguments on 26.09.2019 before D.B.

[Signature]
Chairman

ATTESTED
[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Petitioner's Copy

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1205/2018

Dr. Muhammad Zafar Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others Respondents

INDEX

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Parawise Comments and Affidavit		1-6
2.	Advertisement No. 03/2007	"A"	7
3.	Copy of KP Public Service Commission Recommendation dated 14.12.2007 and 15.02.2008	"B"	8-10
4.	Copy of Regulation 35-3 (a & b) of Khyber Pakhtunkhwa Public Service Commission Regulations 2017	"C"	11-13
5.	Copy of Khyber Pakhtunkhwa Public Service Commission letter dated 05.04.2018	"D"	14-15
6.	Copy of KP Public Service Commission recommendation letter dated 09.03.2016	"E"	16-18

P. Malik

Senior Law Officer
Public Service Commission

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1205/2018

Dr. Muhammad Zafar Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others Respondents

PARAWISE COMMENTS ON BEHALF OF (RESPONDENTS NO.4 & 5)

PRELIMINARY OBJECTIONS:

1. That the appellant has got no locus standi or cause of action against the replying respondent.
2. That the appellant has not approached this Honorable Court with clean hands.
3. That no discrimination / injustice has been done to the appellant.
4. That the appeal is not based on facts and contains unjustified and illegal demands against the lawful authority of the Commission.
5. The appeal is bad in the eyes of law.

ON FACTS:

1. Correct to the extent, that Khyber Pakhtunkhwa Public Service Commission advertised the posts of **Sheep Development Inspector, Agrostologist, Instructors, Veterinary Officers** vide Sr.No 07 to 10 respectively with the following qualifications.

(S.No.7) QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc **OR** Doctor of Veterinary Medicine from a recognized University and (ii) Registration with Pakistan Veterinary Medical Council is must.
AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17.
ELIGIBILITY: Both Sexes.
ALLOCATION: Merit.

(S.No.8) QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc **OR** Doctor of Veterinary Medicine from a recognized University and (ii) Registered with Pakistan Veterinary Medical Council.
AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17.
ELIGIBILITY: Male.
ALLOCATION: Merit.

(S.No.9) QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc, or Doctor of Veterinary Medicine from a recognized University and (ii) Registered with Pakistan Veterinary Medical Council.
AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17.
ELIGIBILITY: Both Sexes.
ALLOCATION: one each to Merit and Zone-1.

(S.No.10) QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from a recognized University.
 Registration with Pakistan Veterinary Medical Council (PVMC)
AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-17.
ELIGIBILITY: Both Sexes.
ALLOCATION: one each to Merit and Zone-3 (for Research)
 5 to Merit 4 to Zone-3, 3 each to Zone-1,2,4 and 2 to Zone-5 (for Health)

(Annex-A)

2. Correct. However the recommendation was sent to the concerned department under Regulation 2003, section 35-3 (a & b) and the same recommendation letter clearly stated that ***“the inter-se-seniority is linked with other posts of the same advertisement and will be communicated later on”*** recommendation letter (Annex-B).

Regulation 35-3 (a & b) is reproduced below:

“(a) Where a large number of subjects / specialties are included in an advertisement, recommendations may not be pended till the

finalization of the entire batch but instead zonal allocation be worked out subject-wise and recommendation conveyed to the Department without indicating to them the zonal allocation and the inter-se-seniority. In recommendations to the Department it shall be made clear that the inter-se-seniority of the recommendee is linked with other subjects and the overall merit position and zonal adjustment will be intimated on the completion of interviews in all subjects. The chronological order of the recommendees shall not confer any right of seniority.

- (b) The combined merit list shall be against a particular advertisement where the posts were advertised collectively but recommendations were staggered due to interview schedule or any other reason".
(Annex-C)**

- 3-4. Incorrect. The seniority list dated 20-02-2009 referred by the appellant was only inter-se-merit / Zonal allocation of 20 posts of Veterinary Officers conveyed by the Public Service Commission to the requisitioning Department and was not an inter-se-seniority list of all the subjects. The appellant misconceived the list of 20.02.2009 as seniority list which was infact inter-se-merit/ zonal allocation list of 20 veterinary officer health of advertisement No. 03/2007 S.No 10 only
5. Correct to the extent that appellant was placed at S. No 6 of the joint seniority list of 02.11.2010 which was prepared in respect of serial No 07, 08, 09 and 10 of advertisement No. 03 / 2007, because of the inclusion of other relevant posts of the requisitioning department concerned / Extension wing. The appellant has got no locus standi or cause of action keeping in view only the nomenclature of a particular post for the purpose of his seniority. Seniority list which the appellant has impugned was joint inter-se-seniority list of the Khyber Pakhtunkhwa Public Service Commission issued to the department concerned including other posts of the Extension wing of livestock department of BPS-17 of the same advertisement i.e Sheep Development Inspector, Agrostologist, Instructors, Veterinary

Officers Health. Appellant has mis-conceived the inter-se-merit with the joint inter-se-seniority.

6. Incorrect, replying respondent No 4 made correspondence regarding the posts of veterinary officers BPS-17 showing only the inter-se-merit list/ zonal allocation in respect of S. No. 10 of Advertisement 03/2007. And further the final joint inter-se-seniority can be well justified from the letter dated 05-04-2018 (**Annex-D**).
7. Correct to the extent that correspondence was made with the requisitioning department vide annexure-G, H & I of the appeal. The rest of the para pertains to the respondent No 2 and 3.
8. Correct.
9. As already explained, in above paras, the appellant has got no cause of action against the replying respondent, hence may not be allowed to raise further grounds at the time of arguments.

GROUND.

- a. Already explained in para 2 of the facts.
- b. As already explained that the inter-se-merit list/ zonal allocation dated 20.02.2009 was issued in respect of 20 posts of veterinary officers health advertisement No. 03./2007 S.No. 10, as actual seniority of the appellant is intact vide joint inter-se-seniority dated 02.11.2010. and this can be well justified from the Khyber Pakhtunkhwa Public Service Commission letter No PSC/SRI-09984 dated 05-04-2018.
- c. Already replied in facts.
- (d-e) Incorrect. Already explained in para 2 of the facts.
- (f) Incorrect. Explanatory reply has been given in para 6.
- (g) Khyber Pakhtunkhwa Public Service Commission had issued the combined seniority list vide letter date 02-11-2010, keeping in view the same nature posts of the Departmental Extension wing of directorate of Agriculture and Livestock as under Khyber Pakhtunkhwa Public Service Commission Regulations 2003.

Hence, the illegal relief sought by the appellant may not be allowed by this Honorable Tribunal.


- (h) As already replied in para 6, Agriculture, Livestock and Cooperative department is comprised of two directorates i.e of Directorate of Research and Directorate of Extension that is why the inter-se-seniority of posts concerned to any of the above wings is kept separate by the Khyber Pakhtunkhwa Public Service Commission. Para-5 of the recommendation of Veterinary Officers vide advertisement number 01/2014 clearly states:

“The inter-se-seniority of the recommendees is linked with other posts of the same advertisement and will be communicated later on. The serial chronological order will not confer any right of seniority”.

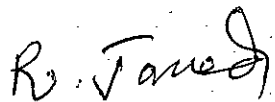
(Annex-E)

Furthermore the stance of the appellant in this para substantiates the submission of Khyber Pakhtunkhwa Public Service Commission that research and extension wings of the Agriculture, Livestock and Cooperative Department are different and that is why separate seniority lists are given for each wing with respect to different posts of the same basic pay scales.

It is, therefore, respectfully prayed that on acceptance of the submissions made herein above, the instant Appeal may please be dismissed having no legal footings.


 DIRECTOR RECRUITMENT
 KHYBER PAKHTUNKHWA
 PUBLIC SERVICE COMMISSION
 PESHAWAR
 (RESPONDENT NO.04)

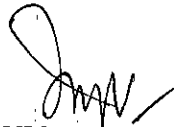
Shabi


 CHAIRMAN
 KHYBER PAKHTUNKHWA
 PUBLIC SERVICE COMMISSION
 PESHAWAR
 (RESPONDENT NO.05)

AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

DEPONENTS


**DIRECTOR RECRUITMENT
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.04)**

7

NWFP PUBLIC SERVICE COMMISSION

Scouts Building, Sector P-I, Phase-IV,

Hayatabad, Peshawar

Website: www.nwfppsc.gov.pk

Annex 'A'

Dated: 25-07-2007

ADVERTISEMENT NO. 03/2007.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by **25-08-2007 (10-09-2007 for candidates from abroad)**. **Incomplete applications shall be rejected without intimation to the candidates. Moreover, applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.**

(S.No.7) 01 Sheep Development Inspector in L& DD Deptt:

QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc **OR** Doctor of Veterinary Medicine from a recognized University and (ii) Registration with Pakistan Veterinary Medical Council is must. **AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

(S.No.8) 01 Agrostologist in L& DD Deptt:

QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc **OR** Doctor of Veterinary Medicine from a recognized University and (ii) Registered with Pakistan Veterinary Medical Council. **AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:** Merit.

(S.No.9) 02 Instructors in L& DD Deptt:

QUALIFICATION: (i) B.Sc (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the Degree of **four Years** course of B.Sc (Hons) Animal Husbandry after F.Sc, or Doctor of Veterinary Medicine from a recognized University and (ii) Registered with Pakistan Veterinary Medical Council. **AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** one each to Merit and Zone-1.

(S.No.10) 02 Veterinary Officers (Research) & 20 Officers (Health)

QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences from a recognized University. Registration with Pakistan Veterinary Medical Council (PVMC) **AGE LIMIT:** 21 to 35 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** one-each to Merit and Zone-3 (for Research) 5 to Merit 4 to Zone-3, 3 each to Zone-1,2,4 and 2 to Zone-5 (for Health)

Secretary

NWFP Public Service Commission
Hayatabad Peshawar Phone: 091-9217654



(8)

Annex (B)

From: **Secretary,**
NWFP Public Service Commission,
Scouts Building, Phase-IV, Near Police Station,
Hayatabad, Peshawar.

To: The Secretary to Govt: of NWFP
Agriculture, Livestock and Coop: Department,
Peshawar.

No. / 51182

Dated 14/12/07

Subject:- Rectt: of Twenty Veterinary Officers Health (B-17) in L & DD
Department

Dear Sir,

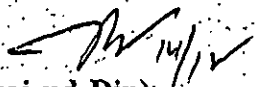
I am directed to refer to your letter No.SO(L&DD)AD-E-1(141)2003 dated 27.03.2007 on the subject noted above and to state that the Commission recommends the following to the Govt: for appointment for the subject cited posts.

Sr No	Name with Father Name	Domicile/Zone
1.	Akbar Ali S/O Mutabar Khan	Dir/3
2.	Haq Aman Ullah S/O Akhtar Ali Khan	Karak/4
3.	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Buner/3
4.	Muhammad Zafar S/O Muhammad Naseem	Bannu/4
5.	Muhammad Tufail S/O Muhammad Bashir	Bannu/4
6.	Hashim Khan S/O Dr. Ijaz Ahmad	Haripur/5
7.	Rahat Ali S/O Daulat Mand	Swat/3
8.	Saeed Khan S/O Abdur Rehman	Mardan/2
9.	Zia-ur-Rehman S/O Shams-ur-Rehman	Buner/3
10.	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	F.R Peshawar/1
11.	Aziz Ahmad S/O Atta Ullah	Swat/3
12.	Attiq ur Rehman S/O Haji Habib ur Rehman	Bannu/4

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- 2- Recommendations in favour of the recommendees are provisional subject to their medical fitness.
- 3- Recommendation in favour of Eight candidates have been kept pending and will be communicated subsequently.
- 4- The serial chronological order will not confer any right of seniority. The inter se seniority of the selectees will be conveyed later on.
- 5- Original applications (with enclosures) of the recommendees are enclosed for your record. Please acknowledge receipt.

Yours Faithfully


(Siraj-ud-Din)
Dy: Secy: III
13/12

CONFIDENTIAL

Telephone: 9217650, 9217652



N.W.F.P. Public Service Commission

Scouts Building behind Hayatabad Police Station,
Phase-IV, Sector P-I, Hayatabad Peshawar.

(Telegraphic address "Publicservis" Peshawar.)

No. 11268

Dated: 15/2/08

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To:

The Secretary to Govt: of NWFP
Agriculture, Livestock and Coop: Deptt:
Peshawar.

Subject: - RECRUITMENT OF 20 POSTS OF VETERINARY OFFICERS HEALTH (B-17) IN L&DD DEPTT:

Dear Sir,

In continuation of this office letter NO.SRA51182 dated 14.12.2007 on the subject noted above and to state that the Commission recommends the following to the Govt: for appointment to the subject cited posts:

<u>S.No.</u>	<u>Name with Father's Name</u>	<u>Domicile/Zone</u>
1	Mr. Ahmad-ur-Rehman S/O Farooq Zaman	N. W. Agy/1
2	Shahid Zaman S/O Farooq Zaman	Bannu/4
3	Muhammad Ismail S/O Nasrim Jan	Nowshera/2
4	Shehzad Naveed S/O Aurang Zeb Khan	Abbottabad/5
5	Muhammad Hanif Khan S/O Azim Khan	Mohmand Agency/1

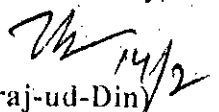
02. Recommendation in favour of the recommendees are provisional subject to the medical fitness.

03. The serial chronological order will not confer any right of seniority. The inter se-seniority of the selectees will be conveyed later on.

04. Recommendation in favour of three candidates will be conveyed subsequently.

05. Original applications (with enclosures) of the recommendees are sent herewith for your record. Please acknowledge receipt.

Yours faithfully:


(Siraj-ud-Din)
Deputy Secretary-III

(11)
Amended

¹[KHYBER PAKHTUNKHWA]
PUBLIC SERVICE COMMISSION

NOTIFICATION

15th December, 2003.

Notification No. ²KP/PSC/31550. In exercise of the powers conferred by Section 10(A) of the ³[Khyber Pakhtunkhwa] Public Service Commission (Amendment) Ordinance, 2002 ([Khyber Pakhtunkhwa] Ordinance XXVII of 2002), the Commission is pleased to make the following Regulations.

PART – I

GENERAL

1. (a) These Regulations may be called the ⁴[Khyber Pakhtunkhwa] Public Service Commission Regulations, 2003.
- (b) They shall come into force at once.
2. In these Regulations, unless the context otherwise requires: -
 - (a) “**Attached Department**” means the department as defined in the ⁵[Khyber Pakhtunkhwa] Government Rules of Business, 1985.
 - (b) “**Appointing Authority**” means the officer or authority designated as such in the Service Rules framed by the government for the post.
 - (c) “**Commission**” means the ⁶[Khyber Pakhtunkhwa] Public Service Commission.
 - (d) “**Member**” means the Member of the Commission and includes the Chairman.

¹ The word “NWFP” substituted with the word “KHYBER PAKHTUNKHWA” vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

² The word “NWFP” substituted with the word “KP” vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

³ The word “NWFP” substituted with the words “Khyber Pakhtunkhwa” vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁴ The word “NWFP” substituted with the words “Khyber Pakhtunkhwa” vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁵ The word “NWFP” substituted with the words “Khyber Pakhtunkhwa” vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

⁶ The word “NWFP” substituted with the words “Khyber Pakhtunkhwa” vide the Khyber Pakhtunkhwa Law (Amendment) Act, 2011.

(12)

PART - XI

MERIT LIST / ZONAL ALLOCATION / RECOMMENDATION

33. MERIT LIST.

- (1) When all the eligible candidates who applied in response to a particular advertisement have been interviewed, the Director Recruitment / Director Examination as the case may be, shall prepare a merit list as per the marks indicated on the evaluation sheet and submit the case for the Commission's consideration.
- (2) Merit list shall be prepared keeping in view the aggregate marks secured by various candidates.
- (3) When two or more than two candidates have secured equal marks in aggregate the candidate who has secured higher marks in the interview shall be marked senior. In case the marks in aggregate and also the marks in the interview are the same, the candidate who is older in age shall be placed senior to the one who is younger. In case all the above-mentioned factors are the same, marks obtained in the final examination of the prescribed qualification for the post shall be the deciding factor.
- (4) In the case of Competitive Examination the merit list shall be prepared in accordance with the laid down provisions of the syllabus of the respective service.

34. ZONAL ALLOCATION.

- (1) The zonal allocation of the vacancies shall be made in accordance with the zonal allocation formula wherever applicable.
- (2) Subject to Government Policy on zonal substitution, it is to be made, with prior approval of the Govt. due to deficiency of qualified candidates from the particular area(s). Such vacancies shall be filled in accordance with the proportionate ratio of the zones given in zonal allocation formula as contained in Regulation 3(a) from among the qualified candidates of other zones appearing on the merit list.

35. RECOMMENDATIONS.

- (1) A decision about recommendations to be made shall be approved by the Commission irrespective of the fact as to whether the interviews had been conducted by a panel or by full Commission. After approval the Director concerned shall

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convey the recommendations to the concerned Department. The candidates recommended for appointment shall be informed of their selection within three days of the release of recommendation to the department. Non-adjusted and Non-marked candidates shall also be informed of their results.

(2) Where the experience forms part of the requisite qualifications, the recommendation of in-service candidates shall be conveyed provisionally subject to perusal of their ACRs by the Commission and finding these satisfactory.

(3) (a) Where a large number of subjects / specialties are included in an advertisement, recommendations may not be pending till the finalization of the entire batch but instead zonal allocation be worked out subject-wise and recommendation conveyed to the Department without indicating to them the zonal allocation and the inter-se-seniority. In recommendations to the Department it shall be made clear that the inter-se-seniority of the recommendee is linked with other subjects and the overall merit position and zonal adjustment will be intimated on the completion of interviews in all subjects. The chronological order of the recommendees shall not confer any right of seniority.

(b) The combined merit list shall be against a particular advertisement where the posts were advertised collectively but recommendations were staggered due to interview schedule or any other reason.



Ann (D)

No. PSC/SR-1/ 0998

Dated: 5-4-18

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To.

The Secretary, Govt of Khyber Pakhtunkhwa,
Agriculture Livestock and Cooperative
Department Peshawar.

Subject: **RECTIFICATION OF SENIORITY LIST OF (B-17) OFFICER
ADVT; NO.03/2007.**

Dear Sir,

I am directed to refer to your letter No.SO(LFC)AD-E-I(141)2016 dated; 08.05.2017, and to state that the combined inter-Se-Seniority of Veterinary Officer, Instructor, Sheep Development Inspector, and Agrostologist issued on 02.11.2010 copy enclosed is intact please.

Yours faithfully,

P/5/4

(Abdul Latif)
Assistant Director-III

cu

Received by hand of Mr. A. Latif

R-SU-SENIORITY LIST OF OFFICERS
(G) (93/2007)

LIVESTOCK (EXTENSION)

SUS

(67)

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No.	Marks	D.O.B	Name With Father's Name	Subject	Domicile
1.	77/47	01.01.84	Abbas Ali S/O Munawar Khan	Instructor	Nowshera/2
2.	71/46	30.08.80	Inam Ullah Khan S/O Saad Ullah Khan	Sheep Devel. Inspector	Charsadda/2
3.	70/45	21.03.84	Sahibzada Shafti Ullah S/O Sahibzada Nasr Ullah	Agrostologist	Peshawar/2
4.	67/39	01.06.83	Haq Aman Ullah S/O Akhtar Ali Khan	Veterinary Officer Health	Karak/4
5.	63/42	01.01.76	Akbar Ali S/O Mutabar Khan	Veterinary Officer Health	Dir/3
6.	63/42	01.12.83	Muhammad Zafar S/O Muhammad Nascem	Veterinary Officer Health	Bannu/4
7.	63/36	15.12.83	Siraj Ud Din S/O Muhammad Younis	Instructor	Bajaur Agency/1
8.	62/39	15.04.81	Muhammad Ubaid Ullah Qureshi S/O Muhammad Jamal Ullah Qureshi	Veterinary Officer Health	Buner/3
9.	60/39	19.08.80	Rahat Ali S/O Daulat Mand	Veterinary Officer Health	Swat/3
10.	60/36	04.05.80	Mohammad Bilal S/O Qabil Shah	Veterinary Officer Health	Mardan/2
11.	59/39	11.03.75	Muhammad Tufail S/O Muhammad Bashir	Veterinary Officer Health	Bannu/4
12.	59/39	19.04.79	Shahid Zaman S/O Farooq Zaman	Veterinary Officer Health	Bannu/4
13.	59/39	08.05.79	Ahmad-Ur-Rehman S/O Mati-Ur-Rehman	Veterinary Officer Health	N.W Agency/1
14.	59/39	05.07.80	Saeed Khan S/O Abdur Rehman	Veterinary Officer Health	Mardan/2
15.	58/36	01.01.78	Fazli Elahi S/O Musharaf Shah	Veterinary Officer Health	Moh: Agency/1
16.	58/36	05.12.80	Hashim Khan S/O Dr. Ijaz Ahmad	Veterinary Officer Health	Haripur/5
17.	57/39	01.01.81	Muhammad Hanif Khan S/O Azim Khan	Veterinary Officer Health	Moh: Agency/1
18.	57/39	04.04.81	Muhammad Ilyas Afridi S/O Shad Muhammad Afridi	Veterinary Officer Health	F.R Peshawar/1
19.	57/36	01.04.80	Zia-Ur-Rehman S/O Shams-Ur-Rehman	Veterinary Officer Health	Buner/3
20.	57/36	01.06.80	Muhammad Ismail S/O Nasrem Jan	Veterinary Officer Research	Nowshera/2
21.	57/36	04.10.84	Ibadullah Jan S/O Pordal Khan	Veterinary Officer Health	Charsadda/2
22.	56/36	01.03.79	Aziz Ahmad S/O Alta Ullah	Veterinary Officer Health	Swat/3
23.	54/36	24.04.77	Atiq-Ur-Rehman S/O Haji Habib-Ur-Rehman	Veterinary Officer Health	Bannu/4
24.	53/36	07.05.79	Shahzad Naveed S/O Aurang Zeb Khan	Veterinary Officer Health	Abbottabad/5

(SYED ILYAS SHAH)
DEPUTY SECRETARY-II

Phone : 091-9213551
Fax : 091-9211795
Website : www.kppsc.gov.pk



Ann 'E'

CONFIDENTIAL
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-Fort Road, Peshawar Cantt.

No. PSC/SR-II/ 010445

16

Dated: 9/3/16

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
Agriculture Livestock & Cooperative Department,
Peshawar.

Subject:

RECRUITMENT TO SIXTY NINE (69) POSTS OF VETERINARY OFFICER (HEALTH) (BPS-17) IN LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT. (Advt:No.01/2014. S.NO.01).

Dear Sir,

I am directed to refer to your letter SO(L&DD)AD-E-1(141)/2011 dated 13.09.2013 on the subject noted above and to state that the Commission recommends the following candidates to Government for appointment against the subject cited posts.

S.No.	Name with Father Name	Domicile/ Zone
1.	Abdul Ahad S/O Abdul Malik	Mardan / 2
2.	Abdul Basit S/O Abdul Khanan	Kohat / 4
3.	Abdul Wadood Jan S/O Abdur Rauf Jan	DI Khan / 4
4.	Abdul Wahab S/O Burhan-Ud-Din	FR Kohat / 1
5.	Adnan Ali S/O Haji Ali Muhammad	Abbottabad / 5
6.	Ajmal Khan S/O Abdur Raziq	Mardan / 2
7.	Amin Ul Haq S/O Muhammad Iqbal	Mansehra / 5
8.	Amir Shahab S/O Shah Pasand	Charsadda / 2
9.	Amjad Ali S/O Sultane Rome	Swat / 3
10.	Anwar Said S/O Itbar Khan	Buner / 3
11.	Anwar Ullah S/O Sana Ullah	Mardan / 2
12.	Arbab Ali S/O Mahboob Ali	Kurram Agy / 1
13.	Arsalan Ali Shah S/O Mian Jahanzaib	Nowshera / 2
14.	Attaullah S/O Amanullah	Swabi / 2
15.	Baseer Jamal S/O Azad Khan	Charsadda / 2
16.	Fazal Hayan S/O Ashaq	Bajaur Agy / 1
17.	Fida Muhammad Khan S/O Faiz Muhammad Khan	Shangla / 3
18.	Gultaj Hussain S/O Gulfam Hussain	Orakzai Ay / 1
19.	Hameed Ali S/O Muhammad Zareen	Mansehra / 5
20.	Ibrahim Jan S/O Muhammad Rasan	Charsadda / 2
21.	Ihsan Ali S/O Muhammad Ameen	Swat / 3
22.	Ikram Ullah S/O Zair Gul	FR Peshawar / 1
23.	Imran Ullah Khan S/O Mir Gulab Khan	Bannu / 4
24.	Inam Ullah Khan S/O Moanber Sharaf	Malakand Agy / 3
25.	Islam Zeb Khan S/O Nawaz Khan	Lakki Marwat / 4
26.	Javed Akbar S/O Noor Gulab	Mardan / 2
27.	Kamran S/O Muhammad Shamim	Bajaur Agy / 1

(Next page)

(17)

28.	Kanwal Khan S/O Awal Khan	Mansehra / 5
29.	Khadim Hussain S/O Mir Azam Khan	Mohmand Agy / 1
30.	Mahboob Alam S/O Mufeez-Ur Rahman	Lower Dir / 3
31.	Mazhar Ilyas S/O Mohammad Ilyas	Charsadda / 2
32.	Mehmood Ul Hassan S/O Muhammad Pervez	Mansehra / 5
33.	Mian Saeed Sarwar S/O Lalai Mian	Swat / 3
34.	Midrar Ullah S/O Fazli Rabbi	Nowshera / 2
35.	Mohammad Riaz Khan S/O Sher Bahadur Khan	Bajaur Agy / 1
36.	Muhammad Arif S/O Muhammad Israr	Peshawar / 2
37.	Muhammad Idrees S/O Aziz Ur Rehman	DI Khan / 4
38.	Muhammad Jaffar S/O Aman Ullah	Khyber Agy / 1
39.	Muhammad Jamal S/O Sadbar Khan	Peshawar / 2
40.	Muhammad Shoaib Alam S/O Gul Ra Jan	S.W Agency / 1
41.	Munibullah S/O Abdul Ghafar	Swat / 3
42.	Muslim Ghaffar Khan S/O Abdul Ghaffar Khan	Swat / 3
43.	Naseeb Ullah Khan S/O Habib Ullah Khan	Bannu / 4
44.	Naseer Ahmad S/O Mian Said Room	Swat / 3
45.	Nasir Abbas S/O Muhammad Abbas	Abbottabad / 5
46.	Nasrullah S/O Fazal Qadar	Mardan / 2
47.	Nauman Sadiq S/O Muhammad Sadiq	Abbottabad / 5
48.	Naveed Khan S/O Aurang Zeb Khan	Swabi / 2
49.	Nawaz Sharif S/O Muhammad Sharif	Mardan / 2
50.	Saad Abdullah S/O Abdullah	Mansehra / 5
51.	Sagheer Ahmad S/O Wazir Badshah	Nowshera / 2
52.	Said Amir Jan S/O Mian Zarawar Jan	Swat / 3
53.	Sami Ullah S/O Sher Azam Khan	Peshawar / 2
54.	Shah Zeb Khan S/O Sana Ullah Khan	DI Khan / 4
55.	Sheikh Muhammad Ansar Azeem S/O Sheikh Muhammad Iqbal	Peshawar / 2
56.	Sher Muhammad S/O Zafar Khan	FR Peshawar / 1
57.	Syed Muhammad Sulaiman S/O Syed Bakht Badshah	Bajaur Agy / 1
58.	Syed Touseef Hussain Shah S/O Syed Matloob Shah	Abbottabad / 5
59.	Syed Zia Ullah Shah S/O Syed Muzarab Shah	Mohmand Agy / 1
60.	Tahir Shah S/O Zahir Shah	Bajaur Agency / 1
61.	Tariq Ahmad S/O Habibul Haq	Swat / 3
62.	Tauqeer Ahsan S/O Abdul Aziz	Mardan / 2
63.	Wajid Ali Khan S/O Ali Akbar	Swat / 3
64.	Wajid Ali Khan S/O Wafa Muhammad	Swat / 3
65.	Zaka Ullah Khan S/O Muhammad Ilyas	Bannu / 4
66.	Zardad Khan S/O Imdad Khan	Peshawar / 2
67.	Zia Ur Rehman S/O Said Jan	Bajaur Agy / 1
68.	Zohaib Khan S/O Zahir Ud Din	FR Bannu / 1

2. Recommendation in favour of the recommendees is provisional subject to their medical fitness and verification of all the documents / testimonials by your Department.

3. Upto date zonal state will be as under:-

	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total
Share:	51	34	34	33	25	25	202
Adjusted:	51	34	34	33	25	25	202
Balance:	-	-	-	-	-	-	-

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4. Recommendation of one (01) candidate has been kept pending due to vital deficient document and will be communicated later on.

5. The inter-se-seniority of the recommendees is linked with other posts of the same advertisement and will be communicated later on. The serial chronological order will not confer any right of seniority.

6. Original applications (*with enclosures*) of the above sixty eight (68) recommendees are enclosed herewith for your record.

7. Kindly acknowledge receipt the same.

Yours faithfully,

(GHULAM DASTAGIR AHMAD)
Director Recruitment

Encl: As above.

at etc

W A K A L A T N A M A
(Power Of Attorney)

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Dr Muhammad Zafar..... (Plaintiff)

The Govt of KP etc..... (Defendant)
VERSUS

I/we, the undersigned in the above noted S.A NO 1205/18, do hereby appoint **Mr. Adnan Aman, Advocate High Court(s)**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my /our counsel in the above noted case and with the authority to engage/ appoint any other Advocate/Counsel on my/our behalf in my/our case and that my/our counsel will not appear whenever a strike call is made by the PBA, PHCBA, KP Bar Council, Pakistan Bar Council or by any other representative body of the lawyers' community. Furthermore, my/our counsel shall not be liable for any acts on my/our behalf, if I/we have furnished an incorrect information or mis-statement and that my/our counsel shall not be liable for any disciplinary action in case of his default in the aforesaid delegated authority.

Attested & Accepted By.

Adnan Aman

Advocate High Court(s), Peshawar
B-15, Haroon Mansion, Khyber Bazar,
Peshawar Office: 091-2551553
Cell: 0321-9853530

Signature of Executants

Dr Muhammad Zafar
(Appellant)