


Appeal No. 1447/2013,  
Mr. Shahid Ali.

07.02.2014

Appellant with Counsel present. Preliminary arguments heard. Counsel for the appellant contended that the appellant is senior most Daftari (BPS-3) in the Office of Political Agent, Khyber Agency. On 05.06.2013 three Junior Clerks of the said office have been promoted to the post of Senior Clerk, hence three posts of Junior Clerk have become fallen vacant out of which one post can be allocated for promotion @ 33% quota reserved for Daftari, Naib Qasid, etc. The appellant filed application on 03.05.2012 followed by another application on 19.07.2012 before the Political Agent, Khyber Agency but not properly responded. Now the Office has asked for application for filling of vacant posts of Junior Clerk through Daily "AJJ" Peshawar dated 11.06.2013. Feeling aggrieved the appellant filed application on 28.06.2013, which is again not responded within the statutory period of 90 days. The appellant filed instant appeal before this Tribunal on 28.10.2013.

In view of the position as explain above read with Rule-27 of the Khyber Pakhtunkhwa Service Tribunal Rules 1974, the case is remanded to the Political Agent, Khyber Agency for decision on the application of the appellant in accordance with the law. So that the appellant if still aggrieved, may adopt proper course of action in accordance with law. The appeal is disposed of in limini on the above ~~terms~~. File be consigned to the record with no order as to cost.

ANNOUNCED  
07/02/2014

  
Member

3.  
26.11.2013

No one is present on behalf of the appellant. To come up for preliminary hearing on 10.12.2013.

  
Member

4.  
10.12.2013

Clerk of counsel for the appellant present and submitted amended memo of appeal with spare sets. To come up for further preliminary hearing on 14.01.2014.

  
Member

5.  
14.01.2014

Public Holiday has been declared by Government on account of Eid Miladun-Nabi. The case is adjourned to 07.02.2014.



  
Reader



Form- A  
FORM OF ORDER SHEET

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

Case No. 1447 /2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28/10/2013	<p>The appeal of Mr. Shahid Ali presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	4-11-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>26-11-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

APPEAL NO. 1447 /2013

**SHAIHD ALI**

**VS**

**A.C.S FATA**

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**APPELLANT**

THROUGH: 

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

APPEAL NO. 1447 /2013

As W.F. Secretary  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar  
Date: 28/10/13  
28/10/13

Mr. Shahid Ali, Daftari (BPS-03),  
O/O the Political Agent, Khyber Agency.....Appellant

**VERSUS**

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road Peshawar.
- 2- The Secretary Social Sector FATA, FATA Secretariat Warsak Road Peshawar.
- 3- The Political Agent Khyber agency.....Respondents

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION TO THE POST OF JUNIOR CLERK (BPS-07) UNDER THE 33% QUOTA RESERVED FOR CLASS-IV EMPLOYEES AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

**That on acceptance of this appeal the respondents may very kindly be directed to consider the appellant for promotion to the post of Junior Clerk (BPS-07) with all consequential benefits and seniority. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.**

**R/SHEWETH:**

**ON FACT:-**

- 1- That the appellant was appointed as Naib Qasid (BPS-2) in the respondent Department vide order dated 11-4-1996. That after appointment till date the appellant performed his duty quite efficiently and upto the entire satisfaction of his superiors. Copies of the promotion order and seniority list are attached as Annexure ..... **A.**
- 2- That after serving for more than 13 years as Naib Qasid (BPS-02) the appellant was promoted to the post of Daftari (BPS-03) against a vacant post vide order dated 30-4-2009.

That subsequently the appellant was placed at Serial No.2 of the seniority list of Class-iv employees of the office of respondent No.3. Copies of the service structure, representations and orders are attached as Annexure ..... **B and C.**

**3-** That later on due to promotion of one Mr. Musafar shah Junior Clerk (BPS-7) to the post of senior clerk (BPS-9) the appellant was ranked at the top of the seniority list. That appellant having eligibility and seniority filed representations before the respondent No.3 for promotion to the post of Junior clerk (BPS-7) in the light of service structure for the post of Junior clerk under the 33% quota reserved for class-iv employees. That the said representations of the appellant were not replied by the respondent No.2, though many other class-iv employees have been promoted under the said 33% quota. Copies of the promotion order and advertisement are attached as Annexure ..... **D, E, F & G.**

**4-** That vide order dated 5-6-2013 three Junior clerks namely Mr. Zaib Ullah khan, Mr. Mujahid khan and Mr. Rooh ul Amin have been promoted to the post of senior clerks (BPS-9). That appellant filed Departmental appeal before the respondent No.3 for promotion to the post of Junior clerk BPS-7 in the light of above mentioned 33% quota reserved for the class-iv employees but in response the respondent No.3 advertised all the three vacant posts in daily Aaj vide dated 11-6-2013. Copies of the promotion order and advertisement are attached as Annexure ..... **H & I.**

**5-** That feeling aggrieved and having no other remedy the appellant filed this appeal on the following grounds amongst the others.

**GROUND:**

- A- That not promoting the appellant to the post of junior clerk (BPS-07) by the respondent Department despite of having eligibility and seniority is against the law, facts and norms of natural justice.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That the respondent Department acted an arbitrary and malifide manner by not promoting the appellant t the post of junior clerk (BPS-7) despite of having eligibility and the seniority.
- D- That according to the service structure and promotion orders already issued by the respondent No.3 the appellant is fully entitled to be promoted to the post of junior clerk (BPS-07).
- E- That appellant is at the top of the seniority list of class-4 employees working at the office of the respondent No.3, therefore the appellant has the right to be promoted to the post of junior clerk (BPS-7) under the 33% quota reserved for class-4 employees.
- F- The appellant seeks the permission to advance other grounds and proofs at the time of hearing.

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

**APPELLANT**

*Sh. Ali*  
**SHAHID ALI**

**THROUGH:**

*N.M. Khattak*  
**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO. \_\_\_\_\_/2013

**SHAHID ALI**

**VS**

**A.C.S FATA**

**APPLICATION FOR RESTRAINING THE RESPONDENTS**  
**NOT TO MAKE APPOINTMENTS ON THE**  
**ADVERTISEMENT DATED 11.6.2013 TILL THE DISPOSAL**  
**OF THE ABOVE MENTIONED APPEAL**

**R/SHEWETH:**

- 1- That the appellant filed above mentioned appeal along with this application before this august service Tribunal in which no date has been fixed so for.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That appellant is the senior most employee of respondent Department and is also eligible for promotion to the post of Junior Clerk (BPS-07) under the 33% quota reserved for the class-iv employees.
- 4- That the grounds of main appeal is also be considered as integral part of this application.

It is therefore humbly prayed that on acceptance of this application the respondents may be directed not to make appointments on the post of junior clerk till the disposal of this appeal.

**APPELLANT**

*Shahid Ali*  
**SHAHID ALI**

**THROUGH:**

*Noor Mohammad Khattak*  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



OFFICE ORDER

A-5-2

Mr. Shahid Ali, son of Ghulam Farwar resident of Village Charkha Khel (Charkhans) District Peshawar is hereby appointed as Naib Qasid in BE-1 against the vacancy caused by the retirement of his father with immediate effect subject to the production of medical fitness certificate.

He will be on probation for two months.

S/1  
Political Agent, Khyber.

No. 1450 - 52 / Acctt dated Peshawar the  
Copy to:-

11/1/1996.

1. The Agency Accounts Officer, Khyber at Peshawar
2. The Accountant Main Office.
3. Mr. Shahid Ali, son of Ghulam Farwar.

for information and necessary action.

*[Signature]*  
Political Agent, Khyber,  
POLITICAL AGENT  
*[Signature]*

*[Signature]*  
**ATTESTED**

B-6

OFFICE OF THE POLITICAL AGENT, KHYBER AGENCY  
OFFICE ORDER.

No. /Acctt:/09 Dated Peshawar the 30/04 /2009.

As per recommendations of the Departmental Promotion Committee, the following promotions are hereby ordered with immediate effect:-

S No.	Name Of Official	Promoted AS	Remarks
01.	Mr. Iqbal Hussain, Senior Clerk (BPS-09)	Assistant (BPS-14)	Against Vacant Post
02.	Mr. Mukarram Khan, Senior Clerk, (BPS-09)	Assistant (BPS-14)	Against Vacant Post
03.	Muhammad Saeed, Junior Clerk (BPS-07)	Senior Clerk (BPS-09)	Against Vacant Post
04.	Mr. Zarin Khan, Junior Clerk, (BPS-7)	Senior Clerk (BPS-09)	Against Vacant Post
05.	Mr. Musafar Shah, Naib Qasid. (BPS-2)	Junior Clerk (BPS-07)	Against Vacant Post
06. ✓	Mr. Shahid Ali, Naib Qasid (BPS-02)	Daftari (BPS-03)	Against Vacant Post ✓

Political Agent, Khyber.

No. 102 - 10 /Acctt:/09.  
Copy forwarded to:-

1. The Assistant Political Agent, Bara.
2. The Assistant Political Agent, Jamrud.
3. The Assistant Political Agent, Landikotal.
4. The Agency Accounts Officer, Khyber.
5. The Superintendent, Main Office.
- ✓ 6. Officials concerned.

For information and necessary action.

**ATTESTED**

Political Agent, Khyber.

C-7  
3

List of Class IV Official of Political Agent, Khyber for promotion as Junior Clerk as stood on 31/07/2008

S#	Name	Designation	BPS	D.O.B	Date of Appointment	Qualification
1	Mr. Musafar Shah	N/Qasid	2	30/3/1968	1/1/1996	S.S.C
2	Mr. Shahid Ali	do <i>Daftry 23</i>	2	22/5/1973	1/4/1996	F.A
3	Mr. Falak Naz	do	2	0/11/1974	30/12/1996	do
4	Mr. Shukarullah	do	2	8/2/1983	4/5/2001	S.S.C
5	Sartef Aman	Chowkidar	2	1/7/1983	4/5/2001	do
6	Rajhan Khan	N/Qasid	2	22/11/1983	1/8/2002	do
7	Gul Hameed	Behshli	2	1/1/1973	15/4/2003	do
8	Shukat Ali	N/Qasid	2	6/9/1976	28/02/2004	M.A
9	Muhammad Iqbal	do	2	10/5/1964	17/03/2004	B.A
10	Fazal Mahmood	do	2	5/2/1969	17/03/2004	S.S.C
11	Nazar Hussain	do	2	25/9/1967	15/1/2005	F.A
12	Naveed Alam	do	2	14/6/1982	15/1/2005	do
13	Hashim Khan	Behshli	2	10/10/1976	14/1/2005	B.A
14	Gul Nawaz Khan	Mali	2	16/2/1977	14/1/2005	S.S.C
15	Ibarar Hussain	N/Qasid	2	20/03/1981	10/6/2005	F.A
16	S. Manzoor Hussain Shah	N/Qasid	2	3/3/1969	23/1/2007	B.A
17	Azizullah	N/Qasid	2	5/10/1983	1/8/2007	S.S.C

*Promoted*

*Promoted*

*Terminated*

*Not*

*Terminated*

*[Signature]*  
Political Agent, Khyber

**ATTESTED**

*now he is at the top of the  
S/ list of P/A Khyber  
Agency.*



# Khyber Pakhtunkhwa

**ESTA CODE**

**(Establishment Code)**

(Edition — 2012)

**ATTESTED**

Law Books Publishers

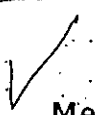
*Handwritten signature and text:*  
Khyber Pakhtunkhwa  
Law Books Publishers

9 2

ESTA CODE: [Establishment Code: Khyber Pakhtunkhwa]

357

- (v) If a period of report is less than 3 months, it shall be ignored for purposes of quantification.
- (vi) Quantification marks should be in round figure.
- (vii) If the overall grading in a PER is ambiguous e.g. placed between 'Good' and 'Average' the quantification will be based on the lower rating.
- (viii) Where Only two reports or less are available on an officer against posts in a particular basic pay scale, these PERs will be added to the PERs earned in the lower post for calculating the average marks.
- (ix) Where an officer appointed to a higher post on acting charge basis is considered for regular promotion that post, the PER earned during acting charge appointment will be added to PERs earned in the lower post for calculating average marks.



**Method of recruitment, qualifications and other conditions applicable to posts in the North-West Frontier Province, Civil Secretariat specified**

GOVERNMENT OF NWFP  
ESTABLISHMENT & ADMINISTRATION DEPARTMENT  
(REGULATION WING)

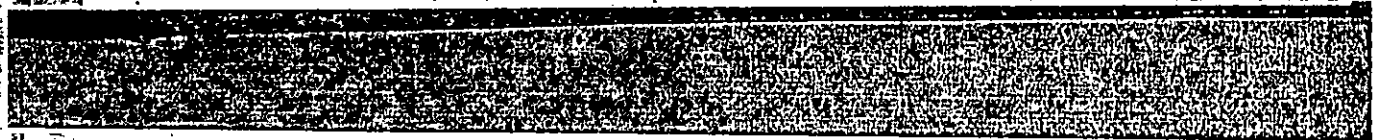
Dated Peshawar, the December 21, 1982

NOTIFICATION NO. SORI (SRGAD) 4-7/86 (A): In pursuance of the provisions contained in Sub Rule (2) of Rule-3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, and in supercession of all previous rules, issued in this behalf, the Services & General Administration Department, in consultation with the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification; which shall be applicable to posts in the North-West Frontier Province, Civil Secretariat specified in column 2 of the said appendix.

**APPENDIX**

S.No	Nomenclature of posts	Minimum qualification for appointment by initial recruitment	Age limit	Method of Recruitment.
1.	Superintendent			By promotion, on the basis of seniority-cum-fitness from amongst holders of the post of Assistant with at least five years services as such.

**ATTESTED**



10



2.	Private Secretary			By promotion, on the basis of seniority-cum-fitness from amongst holders of the post of Personal Assistant with at least two years services as such <sup>1</sup>
3.	Assistant	Degree from a recognized University	18 - 30 years <sup>2</sup>	<sup>3</sup> (a) 25% by initial recruitment; and (b) 75% by promotion on the basis of seniority-cum-fitness, from amongst Senior Clerk with at least five years service as Junior and Senior Clerk.
4.	Personal Assistant			By promotion, on the basis of seniority-cum-fitness from amongst holders of the post of Senior Scale Stenographers with at least three years services as such.
5.	Senior Scale Stenographer		18 - 30 years	<sup>4</sup> By promotion, on the basis of seniority-cum-fitness from amongst the Stenographers (BPS-12) with at least five years service as such; provided that if no suitable candidate is available for promotion then by initial recruitment.
6.	Senior Scale Stenographer (Urdu)	(i) Matriculation or equivalent qualification from a re-cognized Board. (ii) A speed of 80 words per minute in Shorthand in Urdu and 60 words per minute in typing.	18 - 30 years	a) By initial recruitment; or b) By promotion, on the basis of seniority-cum-fitness from amongst holders of the post of Stenographer (Urdu) with at least three years services as such.
7.	Stenographer	(i) <sup>5</sup> Intermediate or equivalent ualifications from a recognized Board; and	18 - 30 years	By initial recruitment

1. Substituted vide Notification No. SOR-I (S&GAD) 4-7/80; dated 10.11.1984 read with otification No.SOE.IV (E&AD) 1-35/2002 dated 27/11/2002.
2. Substituted vide Notification No. SOR-I (S&GAD) 4-1/80, (Vol.III) dated 12/06/1999
3. Substituted vide Notification No. SOR.I (S&GAD) 4-7/80, dated 05/10/1989. SOR-I (S&GAD) 4-7/80, dated 05/10/1985 & No.SOR.IV (S&GAD) 3-2/96(A), dated 16/9/1996
4. Substituted vide Notification No. SOR.I V (S&GAD) 1-1/95, dated 11/01/1996.
5. Substituted vide Notification No. SOR.IV (S&GAD) 3-16/94(A), dated 10/4/1996.
6. Substituted vide Notification No.SOE.IV (E&AD) 1-35/2002 dated 26/09/2002.

		(ii) A speed of 50 words per minute in Shorthand in English and 35 words per minute in typing and Knowledge of Computer in using MS Word, MS Excel.		
8.	Senior Clerk			By promotion, on the basis of seniority-cum-fitness from amongst the post of Junior Clerk with two years services as such.
9.	Junior Clerk	(i) Matriculation or equivalent qualification from a recognized Board; and  (ii) A speed of 30 words per minute in typing.	18-30 years	(a) 33% by promotion from amongst Daftaries, G/Operator, Qasid and Naib Qasids including other equivalent posts in the Secretariat with two years service as such, who have passed S.S.C. Examination; and  (b) 67% by initial recruitment.

Note: -For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc with reference to the dates of their acquiring the Secondary School Certificate provided that:

- i. If two or more official have acquired the SSC in the same session, the official having longer service shall rank senior to other officials.
- ii. Where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference of the senior official or officials

**ATTESTED**



ATTESTED

*[Handwritten signature]*

*[Handwritten signature]*  
19/11/12

19/11/12  
*[Handwritten signature]*

*[Large block of handwritten text, likely a certificate or affidavit]*

*[Handwritten signature]*

F-12





### دفتري سلسلے کے تحت

ذرا درج ذیل کے سائل 3 سال یا اس سے زیادہ سے ڈیڑھ سال تک رہنے والے (DPC) کے تحت رہنے والے اور  
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 ان کے ساتھ ساتھ یہ بھی بتایا جائے کہ ان کے ساتھ ساتھ  
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 ان کے ساتھ ساتھ یہ بھی بتایا جائے کہ ان کے ساتھ ساتھ

تاریخ: 03/07/19

مختار احمد  
 ڈی ایچ او، دفتر، لاہور

**ATTESTED**

F-14  
F-14

OFFICE ORDER

As per recommendations of the departmental promotion Committee, the following promotions are hereby ordered with immediate effect: -

1	Haji Aarangez No. Junior Clerk (BPS-5)	Senior Clerk (BPS-7)	Against vacant post
2	Haji Ali Raiza Junior Clerk (BPS-5)	Senior Clerk (BPS-7)	Against vacant post
3	Muhammad Abrar Khan Junior Clerk (BPS-5)	Senior Clerk (BPS-7)	Against newly created post
4	Mr. Shah Nawaz Naih Qasid (BPS-1)	Junior Clerk (BPS-5)	Against vacant post

161: 66/Accell

Political Agent, Khyber.

No. 161: 66/Accell

Dated

Peshawar the 22/4/2007.

Copy to: -

1. The Assistant Political Agent, Landi Kotal.
2. The Assistant Political Agent, Jamrud.
3. The Assistant Political Agent, Bara.
4. The Agency Account Officer, Khyber.
5. The Superintendent, Main Office.
6. Official concerned.

For information and necessary action.

Political Agent, Khyber.

*under 33 do Quota*  
*3 posts have become vacant*  
*under the control of S.P. Sapp*  
*No. 3.*

G-15

OFFICE OF THE POLITICAL AGENT KHYBER AGENCY.

OFFICE ORDER.

No

/Acctt

Dated

24 /04/2008

As per recommendations of the Departmental Promotion Committee, the following promotions are hereby ordered with immediate effect:-

S. No	NAME OF OFFICIAL	PROMOTED AS	REMARKS
1	Mr. Inayatullah Khan, Senior Clerk (BPS-9)	Assistant (BPS-14)	Against vacant post.
2	Mr. Jan Akbar, Senior Clerk (BPS-9)	Assistant (BPS-14)	Against vacant post
3	Mr. Shāh Jehan, Junior Clerk (BPS-7)	Senior Clerk (BPS-9)	Against vacant post.
4	Mr. Fareedullah, Junior Clerk (BPS-7)	Senior Clerk (BPS-9)	Against vacant post
5	Mr. Haq Nawaz, Naib Qasid (BPS-1)	Junior Clerk (BPS-7)	Against vacant post.

Political Agent Khyber.

No 998-1003 /Acctt:

Copy to:-

1. The Assistant Political Agent, Landi Kotal.
2. The Assistant Political Agent Jamrud.
3. The Assistant Political Agent Bara.
4. The Agency Accounts Officer, Khyber.
5. The Superintendent, Main Office.
6. Officials concerned.

For information and necessary action.

**ATTESTED**

Political Agent Khyber.

H-16

OFFICE ORDER.

As per recommendation of the departmental promotion committee the following promotions are hereby ordered with immediate effect:-

S No	Name Of Officials	Promoted as	Remarks
1	Mr. Ghazi Khan	Assistant (BPS-14)	Against the vacant post.
2	Mr. Minadar	Assistant (BPS-14)	Against the vacant post.
3	Mr. Zaibullah Khan	Senior Clerk (BPS-9)	Against the vacant post.
4	Mr. Mujahid Khan	Senior Clerk (BPS-9)	Against the vacant post.
5	Mr. Roohul Amin	Senior Clerk (BPS-9)	Against the vacant post.

Political Agent, Khyber.

No. 3746-51 /Acctt:-II Dated Peshawar the

15/06/2013

Copy forwarded for information and necessary action to the:-

1. Additional Political Agent, Khyber.
2. Assistant Political Agent, Bara.
3. Assistant Political Agent, Jamrud.
4. Assistant Political Agent, Landikotal.
5. Agency Accounts Officer, Khyber
6. Superintendent Political Agent, Khyber.
7. Official Concerned

**ATTESTED**

Recently 3 posts have become vacant due to promotions of 3 S class I/c to S/c

Political Agent, Khyber.

I-17  
15

پشاور ایبٹ آباد اسلام آباد راجھی سے بیک وقت شائع ہونے والا کثیر الاشاعت قومی روزنامہ

روزانہ کی قیمتیں مندرجہ ذیل ہیں

روزنامہ

پشاور پاکستان

عبدالواحد چوہدری

شمارہ 153

جلد 24

شکل 11 جون 2013

قیمت 12

1291-1434

due to which all the 3  
posts were advertised  
by ignoring the 55% promotion  
quota for class-IV employees

روزنامہ پاکستان پشاور

دفتر پشاور میں جو نیر کلرک (بی بی ایس-7) کی خالی آسامیوں پر مہرتی کیے مندرجہ ذیل  
کوائف کے حامل افراد سے درخواستیں مطلوب ہیں۔

- (1) کسی بھی تسلیم شدہ بورڈ سے سیکنڈری یا سادی قابلیت کم از کم سیکنڈ ڈیڑھ
- (2) عمر کی حد 18 سے 30 سال۔
- (3) امیدوار کا تعلق خیرا خیرا ہے ہو۔
- (4) ٹائپنگ سپید 30 الفاظ فی منٹ۔
- (5) کپیڈوز (ایم ایس آفس وغیرہ) کا تجربہ انسانی قابلیت تصور کیا جائے گا۔

درخواستیں محدود تعداد میں شائع شدہ تعلیمی اسناد شناختی کارڈ، ڈومیسائل سرٹیفکیٹ اور دو عدد تصاویر کے  
ساتھ دفتر پشاور میں کل ایبٹ آباد پشاور صدر میں مورخہ 20-06-2013 تک  
وصول کی جائیں گی۔

پشاور ایبٹ آباد اسلام آباد راجھی سے بیک وقت شائع ہونے والا کثیر الاشاعت قومی روزنامہ

The respondents mala fideley  
advertised all the three  
posts.

ATTESTED

درخواست برائے Promotion برائے آسانی جوئیٹر فلٹر

جناب عالی! یہ کہ سالانہ امتحان میں درجہ اولیٰ میں

مقامی طور پر دفتر ریکارڈ برائے میں ڈیوٹی سر انجام دے رہے ہوں۔ حال ہی میں دفتر میں (D.P.C) پروموشن کی گئی۔ جس میں میرا نام شامل نہیں ہے۔ اس سے پہلے

میں بھی پروموشن ہوئے ہیں۔ اس میں دفتر یا نائب قاضی پروموشن ہوئے ہیں۔

لہذا آپ صاحبان سے گزارش ہے کہ مجھے بھی دفتر سے جوئیٹر فلٹر پر ترقی دے کر میرا کو رفرع فرمائیں۔

سید عزیز گل

28/6/2013

آصف علی صاحبہ ڈیوٹی ریکارڈ برائے

Shiraz

ATTESTED

Handwritten signature

VAKALATNAMA

IN THE COURT OF KPK Service Tribunal Peshawar.

OF 2013

Shahid Ali

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

A. C. S Fata

(RESPONDENT)  
(DEFENDANT)

I/We Shahid Ali

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_/\_\_\_/2013

Shahid Ali

CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

Before the Khyber Pakhtunkhwa Service Tribunal  
Peshawar.

Appeal No. 1447/2013.


Mr. Shahid Ali vs A.C.S FATA

Application for allowing amended appeal 10/12/13

R/Sheweth:

1. That the above mentioned appeal is pending adjudication before this august Service Tribunal in which 10.12.2013 date is fixed for hearing.
2. That appellant filed the above mentioned appeal for the grant of promotion to the post of junior clerk (BPS-07).
3. That due to some clerical mistakes in the above mentioned appeal the appellant wants to submit amended appeal.

It is therefore most humbly prayed that on acceptance of this application the appellant may be allowed to submit amended appeal.

Appellant  
Through:   
Noor Mohammad Khattak  
Advocate