


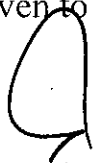
12th June, 2023

1. Clerk of counsel for appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

2. Lawyers are on strike. Therefore, case is adjourned to 20.09.2023 for arguments before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman


**Mutazem Shah **


20th Sep, 2023

1. Junior to counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Dr. Shahid Ullah, Veterinary Officer for the respondents present.

2. Junior to counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Last opportunity is granted. To come up for arguments on 15.01.2024 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Muhammad Akbar Khan)
Member (E)


(Kalim Arshad Khan)
Chairman

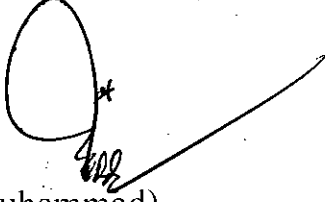
Kamranullah

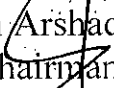
05.01.2023

Learned counsel for the appellant present. Mr. Muhammad - Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Last opportunity is granted to argue the case on the next date, failing which the case will be decided on available record without arguments. Adjourned. To come up for arguments on 03.04.2023 before D.B.

SCANNED
KFST
Peshawar


(Mian Muhammad)
Member (E)


(Kalim Arshad Khan)
Chairman

03.04.2023


Junior to counsel for appellant present.


Asif Masood Ali Shah learned Deputy District Attorney

alongwith Furqan Ahmad Assistant for respondents present.

File to come up alongwith connected Service Appeal No.1563/2019 titled "Ejaz Ullah Vs Government of Khyber Pakhtunkhwa" on 12.06.2023 before D.B. Parcha Peshi given to the parties.

SCANNED
KFST
Peshawar

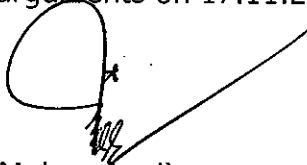

(Muhammad Akbar Khan)
Member (E)


(Rozina Rehman)
Member (J)

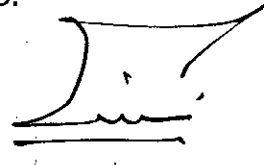
14.09.2022

Learned counsel for the appellant present. Dr. Noor Badshah, Veterinary Officer and Dr. Shahid Ullah, Farm Manager alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 17.11.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

17th Nov. 2022

Clerk of counsel for the appellant present.

Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

SCANNED
KPT
Peshawar

Lawyers are on general strike. To come up for arguments on 05.01.2023 before the D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member(J)

7-3-22

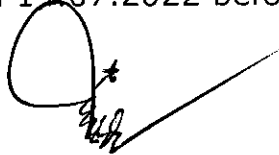
Due to Retirement of the Honble
Chairman the case is adjourned to
9-5-22

Spinal
Readin

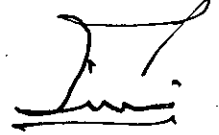
09.05.2022

Appellant in person present. Dr. Sajjad Ullah alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is out of station today. Adjourned. To come up for arguments on 14.07.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

14.07.2022

Mr. Imran Khan, Advocate (junior of learned counsel for the appellant) present. Dr. Anwar Bakhsh and Dr. Shahid Ullah alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 14.09.2022 before the D.B.



(Rozina Rehman)
Member (J)

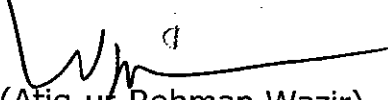


(Salah-ud-Din)
Member (J)

11.11.2020

Appellant in person present. Mr. Usman Ghani learned District Attorney alongwith Jamshaid Legal Officer for respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 27.01.2021 for hearing before the D.B.


(Atiq-ur-Rehman Wazir)
Member (E)


Chairman


27.01.2021

Due to pandemic of Covid-19, the case is adjourned to 15.04.2021 for the same.


Reader

15.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 04.08.2021 for the same as before.



Reader

04.08.2021

Appellant present through counsel.

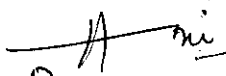
Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Shahid Ullah Form Manager for respondents present.

File to come up alongwith connected Service Appeal No. 1563/2019 titled Ejaz Ullah Vs. Government of Khyber Pakhtunkhwa on 29.11.2021 before D.B.


(Atiq-Ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

29.11.2021 Due to unavailability of DB, the case is adjourned to 07-03-2022.


Reader

16.04.2020


Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 16.07.2020 before D.B.



Reader

16.07.2020

Due to COVID-19, the case is adjourned for the same on 01.09.2020 before D.B.



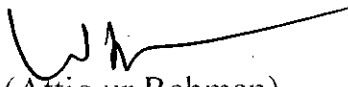
Reader

01.09.2020


Appellant present in person.

Mr. Muhammad Jan learned Deputy District Attorney alongwith Dr. Shahid Ullah Veterinary Officer for the respondents present.

Appellant submitted rejoinder and requested for adjournment as his counsel is not available. Adjourned. To come up for arguments on 11.11.2020 before D.B.



(Attiq ur Rehman)
Member (E)



(Rozina Rehman)
Member (J)

23.12.2019

Appellant with counsel present. Preliminary arguments heard.

The appellant (Class-IV) has filed the present service appeal being aggrieved against the promotion orders dated 15.05.2019 and 22.07.2019 on the ground that through the said promotion orders Class-IV colleagues junior to the appellant were promoted to the post of Junior Clerk in violation of relevant rules for promotion of Class-IV against 33% vacancies of Junior Clerks.

Points urged need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 21.02.2020 before S.B


Member

21.02.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith M/S Jamshad Akhtar, Legal Officer and Shahid Ullah, Veterinary Office for the respondents present. Representatives of the department submitted para-wise comments on behalf of respondents No. 1 to 3. The same is placed on record. Case to come up for rejoinder and arguments on 16.04.2020 before D.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

SCANNED
PESHAWAR

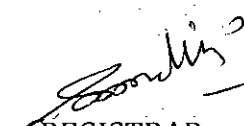

Appellant Deposited
Security & Process Fee
3/1/20

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1565/2019 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2019	<p>The appeal of Mr. Wazir Gul presented today by Mr. Zartaj Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/12/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

01.09.2020

Appellant present in person.

Mr. Muhammad Jan learned Deputy District Attorney alongwith Dr. Shahid Ullah Veterinary Officer for the respondents present.

Appellant submitted rejoinder and requested for adjournment as his counsel is not available. Adjourned. To come up for arguments on 11.11.2020 before D.B.

(Attiq ur Rehman)
Member (E)

(Rozina Rehman)
Member (J)

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1565/2019

Wazir Gul S/O Noorab Gul R/o Village Zore Mandi Tehsil
Dargai Malakand Agency.

(Appellant)

VERSUS

Director General (extension) Live Stock & dairy Development
Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa and others
(Respondents)

INDEX

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4	Copy of educational testimonials are attached	B	8-9
5	Copy of recruitment/ promotion rules is attached	C	10-12
6	Copy of application to RTI is attached	D	13
7	Copy of the departmental appeal is attached	E	14
8	Copies of the their promotion orders are attached	F	15-17
9	Other Documents		18
10	Vakalatnama		19

(Signature)
Appellant

Through .

Zartaj Anwar
Advocate High Court
Office FR , 3 Forth Floor
Bilour Plaza Peshawar Cantt.
Cell: 0331-9399185
Email: Zartaj9@yahoo.com

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2019

Wazir Gul S/O Noorab Gul R/o Village Zore Mandi Tehsil
Dargai Malakand Agency.

(Appellant)

VERSUS

1. Director General (extension) Live Stock & dairy Development
Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa.
2. Director Breed Improvement & Reforms, Bacha Khan Chowk
Peshawar, Khyber Pakhtunkhwa.
3. Director Cattle Breeding & Dairy Farm, Harichand District
Charsadda.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the promotion Orders dated 15.05.2019 and 22.07.2019 which is not communicated, whereas the junior colleagues Class-IV promoted to the post Junior Clerk, against which his departmental Appeal dated 02.08.2019 has not been responded after a lapse of statutory period of 90-days.

Prayer in Appeal: -

On acceptance of this Service Appeal declaring the Appellant fit and eligible to be promoted to the post of junior clerk against the reserve 33% quota for promotion from amongst the Class IV employees on the basis of seniority-cum-fitness, but quit illegally junior colleagues of the Appellant were promoted to the post of Junior Clerk

in violation of rules for promotion, against the reserve quota of Class-IV. The reluctance on the part of the respondents by not promoting the appellant to the post of Junior Clerk is thus to be declared illegal, unlawful, without lawful authority and in violation of the method of recruitment for the post in question and to be declared void ab-initio and need to be set aside. The Appellant has got prior right for the purpose of promotion against reserve quota with all back and consequential benefits.

Or

Any other remedy deemed proper may also be allowed.

Respectfully Submitted:

1. That the Appellant was appointed on 09.03.2011 in the respondent department, as Class IV and posted at Civil Veterinary Hospital, Harichand District Charsadda. **(Copy of appointment orders is attached as annexure A)**
2. That the Appellant is performing his duties at Civil Veterinary Hospital, Harichand District Charsadda for the last 8 years 4 months with no complaints what so ever from the superiors till date.
3. That as per law and rules of the respondent department any Govt. Servant working as Class IV having the requisite qualification has the right to be promoted to the post of Junior Clerk from Class IV with 33% reserve quota on the basis of seniority-cum-fitness. **(Copy of educational testimonials are attached as annexure B)**
4. That according to the method of recruitment / promotion in the respondent department all the Class IV having the requisite Qualification may be promoted to the post of Junior Clerk according to the 33 % promotion quota. **(Copy of recruitment/ promotion rules is attached as annexure C)**
5. That the petitioner since their appointment as Class IV performing their duties as with great zeal and devotion and with the passage of time improved his abilities and made himself eligible for promotion according to the rules.

6. That according to the promotion policy, prescribe quota for promotion from the post of Class IV to the post of Junior Clerk, which include all the Class IV employees.
7. That the Appellant since his appointment requested the department for his inter-se seniority through which he can understand his promotional turn according to the prescribed procedure as he has to be promoted on the basis of seniority-cum-fitness but the same is till date not provided to the Appellant with their ulterior and Malafide intention to adjust their own blue eyed ones, which they almost achieved by promoting juniors to the Appellant to the next higher post i.e. Junior Clerk and left behind the present Appellant without any proper and just reason.
8. That the Appellant when not succeeded by getting the information regarding his seniority position and also came to know about the promotion process of the junior colleagues submit applications to the respondent department and when the efforts were fruitless also approached to the RTI (Right to Information) by submitting application vide DD NO.5087 dated 27.09.2019, and also to the respondent department vide DD No.6511 dated 23.09.2019, requesting on the same plea which is also without any result and all the efforts is till date without any success. **(Copy of application to RTI is attached as annexure D)**
9. That cases were prepared and placed before the departmental promotion committee meeting in respect of Class IV employees promotion to the post of junior clerks, where the name of the Appellant was not included but promoted the junior most employees/ colleagues of the Appellant.
10. That the Appellant submitted appeal for promotion but the same is not being the responded and junior most colleagues were consider for promotion and promoted to the post of junior clerks violate the clear rules and laydown procedure. **(Copy of the departmental appeal is attached as annexure E)**
11. That the act and omission of the respondents by not promoting the present Appellant is illegal, unlawful without lawful authority and against the law and facts, hence liable to be set aside inter alia on the following grounds.

GROUNDS:

- A. That the Appellant has not been treated in accordance with law, his rights secured and guaranteed under the law and Constitution has been violated.
- B. That the respondents are not acting in accordance with law by not promoting the appellant to the post of junior clerk.
- C. That the conduct of the respondents is apparently tainted with malice, malafide and bias, similarly favoritism, nepotism & political interference prevailed in the process of promotion, thus the promotion with immediate effect so made is discriminatory.
- D. That according to the method of recruitment/Promotion all the Class-IV have the requisite qualification and most important the seniority in the cadre are to be consider for promotion under the 33% reserved quota of promotion to the post of junior clerk which is badly violated in the case of the present appellant as the junior most were promoted. *(Copies of the their promotion orders are attached as annexure F)*
- E. That the appellant has not been treated as per notified gazetted rules by the respondents which deprived the appellant from his due rights of promotion since his fulfillment of the required qualifications and experience.
- F. That the state is bound to ensure the elimination of all forms of exploitation and the gradual fulfillment of the fundamental principles. It is also the duties of the state to remove disparity in the income and earning of individuals under Article 37 & 38 of the Constitution.
- G. That under Article 25 of the Constitution of the Islamic Republic of Pakistan 1973, all citizen are equal before law, and that no discrimination is permitted in the similarly placed citizens, thus the discrimination meted out to the Appellant in the grant of regularization is illegal, highly discriminatory and not sustainable.
- H. That inaction on the part of respondents is adversely affecting the appellant career; hence the proprietary demands that the appellant should be promoted from the initial date of promotion as allowed to the similarly placed colleagues whom been promoted to higher posts.

- I. That the Appellant while posted in the respondents department performing their duties with honesty great zeal and devotion to the entire satisfaction of the superiors without any complaint what so ever.
- J. That the Superior Courts have repeatedly held that where a point of law is decided by the Superior Courts that cover the cases of all those civil servants who have not litigated than the good governance require that the benefit of such judgment should also be given to those who may not be parties to the litigation instead of compelling them to approach the Service Tribunal or any other forum. Reference can be made to case reported as SCMR 1996Page 1185, 2009 SCMR Page 1, the Appellant being similarly placed is also entitled to similar treatment meted out to their counter parts.
- K. That the appellant seeks the permission of this honourable Court to rely on additional grounds at the hearing of this appeal.

It is, therefore, prayed that the service appeal as prayed for in the heading of this Appeal may please be accepted in favour of the Appellant and against the respondents.


Appellant

Through

ZARTAJ ANWAR
Advocate Peshawar

&

IMRAN KHAN
Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2019

Wazir Gul S/O Noorab Gul R/o Village Zore Mandi Tehsil
Dargai Malakand Agency.

(Appellant)

VERSUS

Director General (extension) Live Stock & dairy Development
Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa and others

(Respondents)

AFFIDAVIT

I, Wazir Gul S/O Noorab Gul R/o Village Zore Mandi
Tehsil Dargai Malakand Agency, do hereby solemnly affirm
and declare on oath that the contents of the above service
appeal are true and correct and that nothing has been kept
back or concealed from this Honourable Court.

Wazir Gul

Deponent

15401-5120195-2

0346-5385940



7


A. M. Khan

**OFFICE OF THE DIRECTOR CATTLE BREEDING & DAIRY FARM
HARICHAND DISTRICT CHARSAZZA PH & FAX #: 091 - 6640187**

ORDER

As per Government of Khyber Pakhtunkhwa Policy, on the death of Mr. Noorab Gul Milk man, the Competent Authority is pleased to appoint Mr. Wazir Gul S/O Noorab Gul, Village Zore Mandi Tehsil Dargai Malakand Agency as Milk Man (BPS-01) at the permissible pay scale Rs.2970-90-5670/- plus regular allowances from the date of taken over the charge of the post on regular basis.

- His appointment shall be governed by the following terms and conditions.
- a. His appointment shall be on regular basis but with out pension & gratuity in terms of section 19 of the Khyber Pakhtunkhwa Services act 1973 as amended vide Khyber Pakhtunkhwa civil servant(Amendment) act 2005.
 - b. His appointment shall be subject to the medical fitness by the concerned Medical Superintendent.
 - c. He will be governed by such rules regulation orders acts and ordinance etc relating to appointment/transfer leave efficiency and discipline and conduct as have been /may be prescribed by the Government.
 - d. His service shall be liable to termination of the following condition:
 - i) At any time with out notice and with out assigning any reason during the period of his appointment on probation .
 - i) Two-years if their work during this period was not found satisfactory.
 - ii) On one-month notice by government on one side and by him on the other. In case the notice on either side is less then one month, a sum of equivalent to one month pay for the period by which the notice falls short of one month will be paid by government to them or in lieu of their of one month pay shall be forfeited.
 - iii) By Government with out provision notice if at satisfied on material evidence that they are unfit and/or likely to remain unfit for a considerable period by reason of it health or physical disability to discharge their duties. The decision on of the government as to what constitute considerable period shall be final.
 - iv) He shall not be entitled to any traveling allowance/daily allowance while joining first appointment.
 - v) He shall not contribute to provident fund in such a manner and it such as my be prescribed by the government.
3. If he is willing to accept the above-mentioned terms & condition, he should report to concerned officer with within 15-days.


Director,
Cattle Breeding & Dairy
Farm Harichand

No. 384-87/1/6 dated Harichand the 9-3 /2011

Copy of the above is forwarded to:

1. The Director General (Extension) Livestock & Dairy Development Khyber Pakhtun Khwa Peshawar, with reference to verbal discussion dated 08/03/2011.
2. The Director Breed Improvement & Farms Khyber Pakhtun Khwa Peshawar for information.
3. The District Accounts Officer Charsadda for information and further necessary action.
4. Mr. Wazir Gul S/O Noorab Gul village Zore Mandi Tehsil Dargi.


Director,
Cattle Breeding & Dairy
Farm Harichand



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MALAKAND (CHAKDARA) N.W.F.P PAKISTAN

INTERMEDIATE CERTIFICATE EXAMINATION



S.No.MB 021770

INTERMEDIATE (PART-II ANNUAL) EXAMINATION, 2010

Roll No: 39042

Group: Pre-Medical

Wazir Gul

Son of Noorab Gul

of MALAKAND AGENCY

has secured the marks shown against each subject in the H.S.S.C Examination held in the month of April/May as Private candidate.

Subjects	Marks	Marks Obtained					Marks in Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	52	--	59	--	111	One Hundred Eleven
Urdu	200	71	--	70	--	141	One Hundred Forty-One
Islamic Education	50	34	--	--	--	34	Thirty-Four
Pakistan Studies	50	--	--	37	--	37	Thirty-Seven
Physics	200	63	15	49	15	142	One Hundred Forty-Two
Chemistry	200	41	9	30	10	90	Ninety Only
Biology	200	47	14	41	12	114	One Hundred Fourteen
Total : 1100		Marks :		669-B	Six Hundred Sixty-Nine Only		
		Remarks :		MI			

Prepared By : Waqar- DPS

Checked By : Shahid- KPO

Note: Errors / Omissions excepted. Any mistake in Name etc must be intimated within 30 days after receiving the above certificate.

O.W.S. BISE, Malakand.

Date: 27.07.2010, 11:22 AM

Controller of Examinations
B.I.S.E, Malakand.

125

GOVERNMENT DEGREE COLLEGE DARGAI



MALAKAND AGENCY

CHARACTER CERTIFICATE

Name Wazir Gul

Father's Name Abdullah Gul

Class 11th year Class No: 626

Date of Admission 17. 08. 07

Date of leaving College 31. 05. 09

Academic Position passed F.Sc

Date of Birth 12. 03. 1990

Registration No: 422-B/DRC-M-07

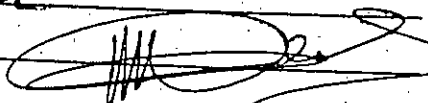
Extra - Curricular Activities NIL

Character Good

General Remarks by Tutor He bears excellent moral character

Tutor/c

Date


PRINCIPAL
Govt. Degree College Dargai
Malakand Agency
(Malakand Agency) *Dargai*

10

Approved: C



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ESTABLISHMENT AND ADMINISTRATION DEPARTMENT
(ESTABLISHMENT WING)

NOTIFICATION

Peshawar, dated the 6th December 2012.

No SOE.IV(E&AD)/1-35/2012:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous rules, issued in this behalf, the Establishment and 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 Khyber Pakhtunkhwa 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.	2.	3.	4.	5.
1.	Superintendent.			By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the post of Assistant with atleast five years service as such.

11

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
2.	Assistant.	Second Class Bachelor's Degree from a recognized University.	20 to 32 years.	(a) Seventy-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Clerks with atleast five years service as Junior and Senior Clerk. (b) twenty-five per cent by initial recruitment.
3.	Senior Clerk.		-	By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerk with atleast two years service as such.
4.	Junior Clerk.	(i) Matriculation with second division or equivalent qualification from a recognized Board; and (ii) a speed of 30 words per minute in typing.	18 to 30 years	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other <u>equivalent posts</u> in the Secretariat with two years service as such, who have passed S.S.C. Examination; and (b) sixty-seven per cent 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:

12

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
				Provided that- (a) if two or more officials have acquired the Secondary School Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; (b) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA.

10 Approved D D

6511
23/9/17

To,

The Director General,
Department of Livestock & Dairy Development KPK Peshawar,

Subject: -

INFORMATION REGARDING SENIORITY LIST FOR THE YEAR
2018-2019 UNDER RTI ACT 2013.

Memo,

It is for your kind information that we have much needed seniority list of (Class -IV) for the year 2018-2019 for some personal use.

It is therefore requested that please provide us the above mention list for the year 2018-2019 under RTI Act 2013 we will be thankful for your favorable consideration.

Yours Obediently,

Wazir Gul, Mahmood Razza,
Shamshad, Muhammad Ijaz
(Class-iv) Govt Dairy Faram
Jamal Abad Harichand

Copy is forwarded to the Information Officer RTI Commission KPK benevolent fund building Saddar Peshawar for information and further necessary action please.

Wazir Gul
Wazir Gul, Mahmood Razza,
Shamshad, Muhammad Ijaz
(Class-iv) Govt Dairy Faram
Jamal Abad Harichand

Cell # 0346 9338307

مختورین - دارالعلوم حیدرآباد حیدرآباد
 14 جون: اپیل
 14

عربوں کی گزارش ہے کہ مینڈہ ڈیرہ نامی ایک ایسی قوم ہے جو ہمیشہ سے دربارِ حیدرآباد
 کی خدمت میں رہا ہے۔ جو کہ گزشتہ سال کے دربار میں بھی اس کا اہم بیٹھ کر
 اس کی جوگتوں کو سمجھا۔ مینڈہ اس گنڈ میں شامل ہے۔ روایت کے مطابق
 مینڈہ کا اثر حق بیٹھ ہے۔ تو ایسا حال ان قوم اس طرف مینڈہ (روانا) میں ہے
 کہ مینڈہ ایسی قوم ہے جو اہل حق و اہل باطل میں بیٹھ ہے

اس بارے میں ایسا حال کی خدمت میں اس طرف اطلاع ہے
 کہ مینڈہ ان اپیل کے غور فرما کر مینڈہ کو دعا دینا کا موقع
 فراہم کروائیں۔

الکافی

سید۔ 1-8-2019

ڈائری نمبر 5187

ایک طالب علم کی طرف سے لکھی گئی

date 2-8-019

حاجی بیگم: ڈائری: الف 10



DIRECTORATE GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT KHYBER PAKHTUNKHWA
 Bacha Khan Chowk, Charsadda Road, Peshawar. Email: dgdexi@yahoo.com
 Tel: 091-9210276, 9210249, Fax: 091-9210285

13 ✓ KN/2019 F

F

No: 2226-51 /154 Promotion Dated Peshawar the 15 /5/2019

ORDER.

On recommendation of the Departmental Promotion Committee (DPC) in the meeting dated 30.04.2019, the competent authority is pleased to approve promotion of the following officials (Daftaris & Class-IV) to the post of Junior Clerk (BS-11) of the Livestock and Dairy Development Department (Extension Wing) Khyber Pakhtunkhwa, with immediate effect.

S.No	Name of Officials	Promoted to the post of
1	Fayaz Ahmed (Daftari B-05)	Junior Clerk (BPS-11)
2	Asad Iqbal (Daftari B-04)	Junior Clerk (BPS-11)
3	Aftab Anwar (Daftari B-04)	Junior Clerk (BPS-11)
4	Adnan Ahmad (Daftari B-04)	Junior Clerk (BPS-11)
5	Sareer Khan (Daftari B-04)	Junior Clerk (BPS-11)
(Class-IV)		
1	Mr. Zahid Jamal (Lab Attendant BS-03) <i>دیار 3</i>	Junior Clerk (BPS-11)
2	Mr. Muhammad Zain-ul-Abiddin (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
3	Mr. Saeed-ul-Hassan (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
4	Mr. Muhammad Ismail (Chowkidar BS-03)	Junior Clerk (BPS-11)
5	Mr. Rahat Shah (Naib Qasid BS-03)	Junior Clerk (BPS-11)
6	Mr. Muhammad Shaukat Khan (Chowkidar BS-03)	Junior Clerk (BPS-11)
7	Mr. Wali Ullah (Behishy BS-03)	Junior Clerk (BPS-11)
8	Mr. Muhammad Asif (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
9	Mr. Dil Jap Khan (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
10	Mr. Muhammad Junaid (Chowkidar BS-03) <i>دیار 7</i>	Junior Clerk (BPS-11)
11	Mr. Khanullah (Naib Qasid BS-03)	Junior Clerk (BPS-11)

Handwritten notes:
 10/1/2018
 10/1/2018
 10/1/2018
 10/1/2018

The official will be on probation for a period of one year in terms of Section 6 (2) of the Khyber Pakhtunkhwa Act, 1973 read with rule 15 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules 1989.

Sd/-
(Dr. SHER MUHAMMAD)
 DIRECTOR GENERAL

Copy of even number and date:

Forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director of Health, Peshawar and District Headquarters.
3. Director, Livestock and Dairy Development, Wazir Marged Area, Warsak Road, Peshawar.
4. District Director, Livestock and Dairy Development, Charsadda and Hangu.
5. District Accounts Officer, Peshawar, Charsadda, Orakzai and Hangu.
6. Assistant Director, Livestock and Dairy Development, Tribal District, Orakzai.
7. Office Nazir (Local).
8. Officials concerned.

Sd/-
(Dr. ALAM ZEB)
 DIRECTOR HEADQUARTERS



**DIRECTOR GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT, KHYBER PAKHTUNKHWA**
Office of the Director General, Livestock & Dairy Development,
Warsak Road, Peshawar. Email: dgce@yaho.com
Tel: (091) 9210276-9210249; Fax: (091) 9210285

16

No. 2446-80 / Promotion Dated Peshawar the 29/7/2019

ORDER

On recommendation of the Departmental Promotion Committee (DPC) of the promotion of the following officials (Daftaries & Class IV) to the post of Junior Clerk (BS-11) vide Director General, Livestock & Dairy Development, Department (Extension Wing) Khyber Pakhtunkhwa, order No. 2226-SI dated 15.05.2019, their further transfer / posting is hereby made as under in the best interest of public service with immediate effect.

S.No.	Name of official	From	To
1	Mr. Zahid Khan Junior Clerk (BS-11)	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Torgar, against the vacant post of Junior Clerk BS-11
2	Mr. Fayaz Ahmed Junior Clerk (BPS-11)	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 1
3	Mr. Zahid Jamal Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar against vacant post of Junior Clerk BS-11
4	Mr. Tariq Iqbal Junior Clerk BS-11	Office of the District Director, Livestock, Peshawar	Office of the Director, Livestock Experiment Station, Jaba District Manshera against the vacant post of Junior Clerk BS-11
5	Mr. Muhammad Ismail Junior Clerk BS-11	Office of the District Director, Livestock, Peshawar	Office of the District Director Livestock, Peshawar against S.No. 4
6	Mr. Masood Shah Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director, Livestock, Nowshera, against the vacant post of Junior Clerk BS-11
7	Mr. Saadullah Husain Junior Clerk BS-11	Office of the District Director, Livestock, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 6
8	Mr. Saadullah Khan Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Tank, against the vacant post of Junior Clerk BS-11
9	Mr. Rahim Shah Junior Clerk BS-11	Office of the Director, Cattle & Dairy Farm, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 8
10	Mr. Romal Mahfooz Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the Director, Livestock Experiment Station, Jaba District Manshera against the vacant post of Junior Clerk BS-11
11	Mr. Muhammad Shakib ul Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 10
12	Mr. Saif ur Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Kohat, against the vacant post of Junior Clerk BS-11
13	Mr. Saif ur Rehman Junior Clerk BS-11	Office of the District Director, Livestock, Mangu	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 12
14	Mr. Saif ur Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Karak against the vacant post of Junior Clerk BS-11
15	Mr. Mujib ul Islam Junior Clerk BS-11	Office of the District Director, Livestock, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 14
16	Mr. Faheem Ullah Khan Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Swabi against the vacant post of Junior Clerk BS-11
17	Mr. Muhammad Zahir Junior Clerk BS-11	Office of the District Director, Livestock, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 16
18	Mr. Saif ur Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road, Peshawar
19	Mr. Saif ur Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road, Peshawar

20	Mr. Anwar Ahmad Junior Clerk (BPS-1)	Office of the Director General Livestock & Dairy Development Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road, Peshawar.
21	Mr. Sarver Khan Junior Clerk (BPS-1)	Office of the Director General Livestock & Dairy Development Peshawar	Office of the Sheep Development officer, sub Division Hassan Khel, Peshawar against the vacant post of Junior Clerk BS-11
22	Mr. Dst Jaz Khan Junior Clerk BS-11	Office of the Director General Livestock & Dairy Development Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.
23	Mr. Muhammad Jamid Jan Junior Clerk BS-11	Office of the District Director Charsadda	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.
24	Mr. Khan Bah Junior Clerk BS-11	Office of the Assistant Director Livestock & Dairy Development Orakzai	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.

Sd/-
(Dr. SHER MUHAMMAD)
DIRECTOR GENERAL

Copy of even number and date

Forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Cattle Breeding and Dairy Farm, Harichand.
3. Director, Livestock and Dairy Development, Newly Merged Area, Warsak Road, Peshawar.
4. Director, Livestock Experiment Station, Jaba District, Manshera.
5. District Director Livestock, Torgar, Peshawar, Nowshera, Tank, Swabi, Kohat, Karak, Charsadda and Hangu.
6. District Accounts Officer, Torgar, Peshawar, Nowshera, Tank, Swabi, Kohat, Karak, Charsadda, Manshera and Hangu.
7. Assistant Director, Livestock & Dairy Development, Tribal District, Orakzai.
8. Sheep Development officer, sub Division Hassan Khel, Peshawar
9. Office Nazir (Local)
10. Officials concerned.

(Dr. ALAM ZEB)
DIRECTOR HEADQUARTERS

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Government of Khyber Pakhtunkhwa
District Accounts Office Charsadda
Monthly Salary Statement (July-2019)



Personal Information of Mr WAZIR GUL d/w/s of NOORAB GUL

Personnel Number: 00572221 CNIC: 1540151701957 NTN:
 Date of Birth: 12.03.1990 Entry into Govt. Service: 12.03.2011 Length of Service: 08 Years 04 Months 021 Days

Employment Category: Active Temporary

Designation: MILK MAN 80000993-GOVERNMENT OF KHYBER PAKH
 DDO Code: CA4145-DEPUTY DIRECTOR CATTLE BREEDING DAI FORM HARICHND CHARSAJDA
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: Interest Applied: Yes **GPF Balance:** 31,877.00
 Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 03 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	12,730.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	277.00	2199	Adhoc Relief Allow @10%	196.00
2211	Adhoc Relief All 2016 10%	999.00	2224	Adhoc Relief All 2017 10%	1,273.00
2247	Adhoc Relief All 2018 10%	1,273.00	2264	Adhoc Relief All 2019 10%	1,273.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription - Rs 770	-770.00	3501	Benevolent Fund	-300.00
3620	House Rent Deduction 5%	-636.00	3630	Water Charges	-20.00
4004	R. Benefits & Death Comp:	-451.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till JUL-2019: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 19,521.00 Deductions: (Rs.): -2,177.00 Net Pay: (Rs.): 17,344.00

Payee Name: WAZIR GUL
 Account Number: 4138330220
 Bank Details: NATIONAL BANK OF PAKISTAN, 230410 TEHSIL BAZAR, Charsadda, TEHSIL BAZAR, Charsadda.; Charsadda

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:
 City: F Domicile:- Housing Status: No Official
 Temp. Address:
 City: Email: wazirgulkpk@gmail.com

POWER OF ATTORNEY

In the Court of

1 Cyber Pukhtoon Lehna Sarda Tribunal Peshawar
Huzifa Gul

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

DB Live Stock & others

} Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/W, the undersigned, do hereby nominate and appoint

ZARTAJ ANWAR ADVOCATE, my true and lawful attorney, for me in my same and on my behalf to appear at PS to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

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

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____

Executant/Executants _____
Accepted subject to the terms regarding fee _____

Handwritten signature

Zartaj Anwar
Advocate High Courts

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3-4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Ph.091-5272154 Mobile-0331-9399185
BC-10-9851
CNIC:17301-1610454-5

POWER OF ATTORNEY

In the Court of

Khyber Pakhtunkhwa Service Tribunal

Wazir Gul

} For *Regms*
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

D.G and others

} Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____

Fixed for *23/12/2011*

I/W, the undersigned, do hereby nominate and appoint

MUBARAK ZEB ADVOCATE HIGH COURT PESHAWAR my true and lawful attorneys, for me in my same and on my behalf to appear at _____ and plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so. any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

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

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____ the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____

Qull

Mubarak Zeb
MUBARAK ZEB

Advocates High Court Peshawar

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Mobile-0334-4274247

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO.1565/2019

Wazir Gul.....Appellant

VERSUS

Director General (Ext), Livestock and Others.....Respondents

INDEX

S.No.	Description of Documents	Annexure	Page No
1.	Parawise comments on behalf of Respondent No.01, 02 & 03.	--	1-3
2.	Affidavit.	--	4
3.	Minutes of the DPC Dated 30/04/2019.	A	5-6
4.	Service Rules of the Department.	B	7-10
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7.	Typing test result of all the successful candidates.	E	15-44
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①

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 1565/ 2019

Wazir Gul S/O Naborab Gul of the cause of appeal Appellant

VERSUS

2

Director General (Ext), Livestock & Dairy Development Department, Peshawar & Others Respondents

Para-wise comments on behalf of the respondent No. 01, 02 & 03.

Respectfully Sheweth/ Daftari for

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no locus standi for filing this Service Appeal.
2. The Appeal is wrong and based on illegal and unlawful presumptions.
3. The Appellant has got no cause of action to file the present Appeal.
4. The Appeal is not maintainable in this present form.

FACTS

1. Correct to the extent that the appellant was appointed as Class-IV on the mentioned date by the office of Director Cattle Breeding and Dairy Farm Harichand, District Charsadda (Respondent No 03).
2. Pertains to record.
3. Correct to the extent that as per service recruitment rules of the Department, 33% reserved quota of Class-IV/Daftari for promotion to Junior Clerk should be filled in as per the eligibility criteria along with seniority, i.e. only candidate with matriculation and having typing speed of 30 words per minute. (Annexure - A & B).
4. Correct to the extent that all the Class-IV/Daftari of the Department having the requisite qualification along with typing speed of 30 words per minute are eligible for promotion to 33% reserved quota against the post of Junior Clerk, subject to seniority cum fitness.
5. Pertains to record.
6. Correct to the extent that the 33% promotion quota of Class-IV/Daftari to the post of Junior Clerk includes all the Class-IV employees subject to seniority cum fitness.
7. Incorrect. The appellant has never requested for their inter-se seniority list as per official record. Moreover, all the promotions have been made according to the service recruitment rules prescribed for 33% promotion of the Class-IV/Daftari to the post of Junior Clerk. It is pertinent to mention here that Appellant's name was included in the seniority list issued by the office of respondent No 03, did not appear for the interview on the mentioned date. (Annexure C).

Approved


- 3. Correct to the extent that the application of the Appellant received was considered by the office of respondents as per rules. Meanwhile, the Appellant filed the instant Appeal in the Khyber Pakhtunkhwa Service Tribunal, Peshawar; therefore, the said documents are hereby annexed in the para-wise comments. (Annexure-D).
- 9. Incorrect. The Appellant was considered to appear for an interview, but he did not appear for the said interview. It is worth to mention here that all the candidates promoted to the post of junior clerk appeared and qualified the typing test. (Annexure-E).
- 10. Incorrect. As stated above.
- 11. Incorrect. The act and omission of the respondents are quiet legal and based on service recruitment rules of the Department.

Grounds

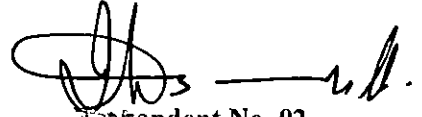
- A. Incorrect. The action of respondents is based on facts and law and the Appellant's opinion regarding violation of his secured rights is totally biased and based on false presumptions.
- B. Incorrect. The respondents have acted according to Law and service recruitment rules prescribed for 33% promotion of the Class-IV/Daftari to the post of Junior Clerk.
- C. Incorrect. The conduct of respondents is not tainted with any intension to harm someone, and the unlawful blaming of the Appellant toward respondents is totally based on mala fide intension.
- D. Incorrect. No violation has been made in case of 33% reserved quota of promotion, According to the service recruitment rules framed for said promotion of Class-IV/Daftari to the post of Junior Clerk, only candidate with matriculation and having typing speed of 30 words per minute were considered for promotion.
- E. Incorrect. The Appellant has been dealt as per rules laid down for the said promotion.
- F. No Comments.
- G. Incorrect. No Violation of Article 25 of the constitution of the Islamic Republic of Pakistan 1973 and discrimination have been made by the respondents and the Appellant has been treated as per rules.
- H. Incorrect. The Unlawful actions by the Appellant towards respondents clearly demands for the dismissal of the instant Appeal with cost.
- I. As replied above.
- J. Correct to the extent that the Appellant's case being not similarly placed to the mentioned SCMR, ordered by the August Supreme Court of Pakistan, Islamabad as the Appellant has been treated according to the Service Recruitment Rules of the Department.
- K. The respondents seek permission to raise additional grounds at the times of arguments

It is, therefore, most humbly prayed that the Service Appeal may kindly be dismissed in favor of the respondents against the Appellant with cost.

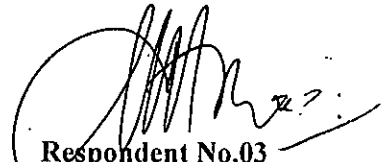
Amir
[Signature]

3

Respondent No. 01
Director General (Ext.) Livestock &
Dairy Development Department
Peshawar



Respondent No. 02
Director Breed Improvement &
Farms, Peshawar



Respondent No.03
Director Cattle Breeding & Dairy
Farm Harichand District
Charsadda

Approved





DIRECTORATE GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT
KHYBER PAKHTUNKHWA

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

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE MEETING FOR PROMOTION OF DAFTARIS / CLASS-IV SERVANTS TO THE POST OF JUNIOR CLERKS HELD ON 30.04.2019 AT 10.00 AM IN THE DIRECTORATE GENERAL (EXTENSION) LIVESTOCK & DAIRY DEVELOPMENT, KHYBER PAKHTUNKHWA, PESHAWAR.

A meeting of the Departmental Promotion Committee was held on 30.04.2019 at 10.00 am in the Directorate General (Extension) Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar. The following committee members attended the meeting.

1. Dr. Sher Muhammad, Director General (Ext) L&DD, Khyber Pakhtunkhwa, Peshawar.....Chairman.
2. Mr. Ajmal, Section Officer (Ltig), Representative of Administrative Department.....Member.
3. Dr. Sajjad Wazir, Assistant Director (HQs), L&DD, Newly Merged Areas, Warsak Road, Peshawar.....Member
4. Dr. Alam Zeb, Director (HQs) L&DD, Khyber Pakhtunkhwa, Peshawar.....Member
5. Dr. Ahmed Kamal, Director, Breed Improvement & Farms, L&DD, Peshawar.....Member
6. Dr. Ansar, Veterinary Officer (HQ Establishment).....Member / Secretary

The committee was informed that 16-posts of Junior Clerks were lying vacant in Livestock & Dairy Development (Extension) Khyber Pakhtunkhwa due to promotion of the incumbent of the posts to higher posts, and needed to be filled in from amongst the Daftari / Class-IV employees under 33% promotion quota. As per service recruitment rules of the department, the selection was to be made as per the eligibility criteria along with seniority, i.e. only a candidate with matriculation and having typing speed of 30 words per minute would be considered for promotion.

In the previous Departmental Promotion Committee meeting held on 27.12.2018, it was decided to scrutinize all the documents of the eligible officials, from the concerned institutions before considering them for promotion to the next higher scale.

Consequently, the committee after examining the SSC Certificate of the eligible candidates recommends the following officials for promotion to the post of Junior Clerk BPS-11 against the available clear vacant posts in Livestock & Dairy Development (Extension Wing) Khyber Pakhtunkhwa.

Daftari

1	Fayaz Ahmed (Daftari B-05)
2	Asad Iqbal (Daftari B-04)
3	Aftab Anwar (Daftari B-04)
4	Adnan Ahmad (Daftari B-04)
5	Saqeer Khan (Daftari B-04)

Class-IV

1	Mr. Muhammad Shakeeb-ur-Rehman, Chowkidar BPS-03
2	Mr. Muhammad Junaid Jan, Chowkidar BPS-03
3	Mr. Zaib-ul-Abideen, Cattle Attendant BPS-03
4	Mr. Saeed-ul-Hassan, Cattle Attendant BPS-03
5	Mr. Zahid Jamal, Lab Attendant BPS-03
6	Mr. Rahat Shah, Naib Qasid BPS-03
7	Mr. Muhammad Ismail, Chowkidar BPS-03
8	Mr. Khanullah, Naib Qasid BPS-03
9	Mr. Dil Jan Khan, Cattle Attendant BPS-03
10	Mr. Wali-Ullah, Behishti BPS-03
11	Mr. Muhammad Asif, Cattle Attendant BPS-03

Meeting ended with vote of thanks.

(A) 6

Representative of Administrative Department
(Member)

(Dr. Sajjad Wazir)
Assistant Director, L&DD, Merged Areas
(Member)

(Dr. Alam Zeb)
Director Headquarter
Khyber Pakhtunkhwa
(Member)

(Dr. Ahmad Kamal)
Director Breed Improvement & Farms
L&DD (Ext), Peshawar
(Member)

(Dr. Ansar)
Veterinary Officer (H) Estab
(Member/ Secretary)

(Dr. Sher Muhammad)
Director General
(Chairman)

Assistant

Annexure - B

GOVERNMENT OF NORTH WEST FRONTIER PROVINCE AGRICULTURE, LIVESTOCK & COOPERATIVE DEPARTMENT

Peshawar, dated the 26/06/2007

8126
27/8/07

NOTIFICATION

No. SO(L&DD)AD-E-(236)/2006/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) Rules, 1989, and in supersession of this Department's Notification No. SO(L&DD)AD-E-(236)/2006/Ext. dated 30.9.2003, the Agriculture, Livestock and Cooperatives Department, in consultation with the Establishment and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions as specified in column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts specified in column 2 of the said Appendix in Extension Wing of Livestock and Dairy Development Department of the North West Frontier Province.

APPENDIX

PART-I

PROFESSIONAL STAFF

S#	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Appointment (Recruitment and Appointment)
1	Director General, Livestock and Dairy Development (Extension Wing), NWFPP		4	By selection on merit from amongst the Directors/ Epidemiologists/ Principal Animal Husbandry in-Service Training Institute/ Executive District Officer (Agriculture) with three years experience as such or having ten years services in BPS-18 and above and registered with Pakistan Veterinary Medical Council.
2	Director/ Epidemiologist/ Principal Animal Husbandry in-Service Training Institute/ Executive District Officers (Agriculture)			By promotion on the basis of seniority-cum-fitness from amongst District Livestock Officers / Agency Livestock Officers/ Deputy Director (Headquarters)/ Senior Veterinary Officers/ Wool Analysts/ 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 Council.
3	District Livestock Officer/ Agency Livestock Officer/ Deputy Director (Headquarters)/ Senior Veterinary Officer (SVO)/ Training Coordinator Wool Analyst/ Sheep Development Officer	B.Sc. in Veterinary/ Animal Sciences with three years experience as such; OR M.Sc. (Hons)/ M.Phil/ M.S. in relevant subject with Seven Years experience as such; OR Doctor of Veterinary Medicine or B.Sc. (Hons) Animal Husbandry or equivalent qualification with Ten Years experience as such.	30 to 50 years	a) Seventy Five per cent by promotion on the basis of seniority-cum-fitness from amongst Veterinary Officer (Health)/ Laboratory Managers/ Semen Distribution Officers/ Livestock Production Officers/ Sheep Development Inspector/ Cattle Development Inspector/ Instructor/ Field Dairy Assistants/ Agrostologists/ Livestock Managers/ Female Instructors/ Female Programmers/ Coordinators/ Female Veterinary Officers having five years service as such and registered with the Pakistan Veterinary Medical Council; and b) Twenty Five per cent by initial recruitment.
4	Livestock Economist	Master's degree in Agriculture Economics or in Economics from a recognized University with Seven Years work experience in	30 to 40 years	By initial recruitment.

Approved
[Signature]

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		having Master's Degree in Agriculture, Economics or Economics after BVM/ B.Sc. (Hons) A.H. with required experience)		
5.	Veterinary Officer (Health)/ Laboratory Manager/ Semen Distribution Officer	a) Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences from a recognized University; and b) Registered with PVMC.	21 to 35 years	By initial recruitment.
6.	Livestock Production Officer/ Sheep Development Inspector/ Cattle Development Inspector/ Instructor/ Field Dairy Assistant/ Agrostologist/ Livestock Manager	a) 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 b) Registered with PVMC.	21 to 35 years	By initial recruitment.
7.	Female Instructor/ Female Programme Coordinator/ Female Veterinary Officer	a) 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 b) Registered with PVMC.	21 to 35 years	By initial recruitment.
8.	Veterinary Supervisor (Male/ Female)	a) Secondary School Certificate from a recognized Board of Education; b) Two Years Veterinary Assistant Training Certificate from a recognized Training Institute; and c) Second class Bachelors degree from a recognized university.	20 to 32 years	a) Seventy Five per cent by promotion on the basis of seniority-cum-fitness from amongst Senior Veterinary Assistants (Male/ Female) and b) Twenty Five per cent by initial recruitment.
9.	Senior Veterinary Assistant (Male/ Female)	a) Secondary School Certificate from a recognized Board of Education; b) Two Years Veterinary Assistant Training Certificate from a recognized Training Institute; and c) Second class Bachelors degree from a recognized university.	20 to 32 years	a) Seventy- five per cent by promotion on the basis of Seniority-cum-fitness from amongst the Veterinary Assistants (Male/Female) having attended the basis course of six weeks for Veterinary Assistants at AHITJ; and b) Twenty Five per cent by initial recruitment.
10.	Veterinary Assistant (Male/ Female)	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.

Approved
[Signature]

PART-II

MINISTERIAL STAFF

S.#	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Recruitment
1	2	3	4	5
1.	Accounts Officer			By promotion on the basis of seniority-cum-fitness from amongst Superintendents with at least Five Years service as such.
2.	Superintendent			a) Seventy Five per cent by promotion on the basis of seniority-cum-fitness from amongst Assistants with at least Ten Years service as such; and b) Twenty Five per cent by

				seniority-cum-fitness, from amongst Senior Steno Typists with at least Ten Years service as such.
3	Stenographer	a) Degree from a recognized University. b) A speed of Eighty words per minute in shorthand and Forty words per minute in typing, and c) Knowledge of Computer in using MS-Word, MS-Excel & In-page.	20 to 32 years	a) Fifty per cent by initial recruitment; and b) Fifty per cent by promotion on the basis of seniority-cum-fitness, from amongst Steno Typist with at least Ten Years service as such.
4	Office Assistant	Degree from a recognized University.	20 to 32 years	a) Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst senior clerk/storekeeper having at least five years service as such and who have passed the Departmental Examination if any; and b) Twenty five per cent by initial recruitment.
5	Computer Operator	(a) Second Class Intermediate certificate in statistics, economics, mathematics, physics or computer science as one of the subjects; and (b) one year diploma or equivalent qualification in Computer or Information Technology from a recognized Board of Technical Education.	18 to 32 years	By initial recruitment.
6	Steno-Typist	a) Intermediate or equivalent qualification from a recognized Board; and b) A speed of Sixty words per minute in short-hand in English and Thirty Five words per minute in typing; and c) Knowledge of Computer in using MS-Word, MS-Excel & In-page.	20 to 32 years	By initial recruitment.
7	Senior Clerk/Store Keeper			By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks with at least Five Years service as such.
8	Junior Clerk	a) Secondary School Certificate from a recognized Board; and b) Typing speed of Thirty words per minute.	18 to 30 years	a) Sixty Seven per cent by initial recruitment; and b) Thirty Three per cent by promotion, from amongst the Daftaries, Gestetners, Operators, Naib Qasids and other equivalent posts who possess Secondary School Certificate from a recognized Board and have typing speed of Thirty words per minute.

Approved
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**PART-III
NON-TECHNICAL STAFF**

1	2	3	4	5
	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Recruitment
1	Farm Manager	B.Sc. (Hons) Agriculture with Animal Science as major subject or equivalent qualification from a recognized University.	21 to 35 years	By initial recruitment.
2	Mechanical Supervisor (Liquid Nitrogen Plant)	Diploma in Mechanical Engineering from a recognized Polytechnic Institute.	20 to 32 years	By initial recruitment.
3	Field Assistant	Secondary School Certificate from a recognized Board with two years prescribed training/course from a	18 to 32 years	a) By initial recruitment. b) If no suitable candidate is available, then by transfer from any other

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				prescribed for initial recruitment.
4.	Carpenter/ Electrician/ Mechanic/ Blacksmith/Machine Operator.	Middle pass and proficiency in the trade.	18 to 32 years	By initial recruitment.
5.	Driver	Secondary School Certificate from a recognized Board and holder of L.T.V. license.	18 to 32 years	By initial recruitment.
6.	Tube Well Operator	Preferably literate with proficiency in the trade.	18 to 32 years	By initial recruitment.
7.	Daftar	Middle or equivalent qualification.	18 to 32	By promotion, on the seniority-cum- fitness from amongst Naib-Qasid /Chowkidar/Sweeper/Behishti/Cycc/Grass Cutter/Attendant/Shepherd/Plough man/Milkmaid/Mali/Cook, who passes middle pass certificate; or if no suitable qualified person is available then by initial recruitment.
8.	Naib Qasid/ Chowkidar/Sweeper/ Behishti/Cycc/Grass Cutter/Attendant/ Shepherd/ Ploughman/Milk Man/Mali/Cook.		18 to 35 years	By initial recruitment.

SECRETARY TO GOVERNMENT OF NORTH WEST FRONTIER
PROVINCE AGRICULTURE, LIVESTOCK AND COOPERATIVE DEPARTMENT

Order No. & Date etc.

Copy forwarded for information and necessary action to:

1. Secretary to Government of NWFP, Establishment Department.
2. Secretary to Government of NWFP, Finance Department.
3. Secretary to Government of NWFP, Law, Parliamentary Affairs & Human Rights Department
w/r to his letter No. LD/REG.II(6)/1976/6019-20 dated 18-06-2007.
4. Director, Livestock & Dairy Development, NWFP Peshawar.
5. 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 & Law Departments alongwith details of gazette in which it is
published.
6. PSO to Chief Minister, NWFP.
7. PSO to Chief Secretary, NWFP.
8. PS to Minister Agriculture, NWFP.
9. PS to Secretary Agriculture.

(NABEMULLAH)
Section Officer (L&DD)

Charsadda

Name	Father's Name	Domicile	Contact No.	Signature
Nadeem ali	Ali Gohar	Charsadda	0344-2446770	Nadeem ali
Ejazullah	Sheer Muhammad	Charsadda	0346-9338307	Ejazullah
Fasihullian	Shamsul Arif	Charsadda	032406618	Fasih
Wajid ali	Afzal Khan	Charsadda	0314770005	Wajid
Yasir ali	Lal Zada	Charsadda	03007005707	Yasir
Ahmad Ali Jan	Muslehuddin	Charsadda	03449011660	Ahmad
Muhammad Ali	Muhammad Ali	Charsadda	0302880000	Muhammad
Bader Muro	Harret Muro	Charsadda	03468332925	Bader
Kamranullah	Tahseerullah	Charsadda	03059694659	Kamran
FIRIF KHAN	Fazal Dayan	Charsadda	0315-9478190	Fazal Khan
Awais Jan	Shahjehan	Charsadda	0316-9935373	Awais
Gohar ALI	KAVIM KHAN	Charsadda	0313 6282825	Gohar
MUHAMMAD BICAI	Fida Muhammad	Charsadda	0301-8820048	Muhammad
Asif Khan	ISRARUDIN	Charsadda	03469371796	Asif Khan

Charsadda

No.	Name	Father's Name	Domicile	Contact No.	Signature
	WISAL Khan	Kahim Khan	Charsadda	03029591668	[Signature]
	NUSW Sheerwan	Khushroo Khan	Charsadda	03015181842	[Signature]
	M. Saleem	Mumtaz Gul	Charsadda	03009547063	[Signature]
	Daisar Alam	Gul Muhammad	Charsadda	03149011164	[Signature]
	Nowshad	GHAZI Khan	Charsadda	03120917211	[Signature]
	Rahat Khan	Shermuhamad	Charsadda	03419345742	[Signature]
	m. Qil	[Signature]	Charsadda	03059485385	[Signature]
	M. Junaid Jan	Kalle Jan	Charsadda	03159509815	[Signature]
	[Signature]				

OFFICE OF THE DIRECTOR CATTLE BREEDING & DAIRY FARM
HARICHAND DISTRICT CHARSADDA PH & FAX #: 091 - 6640187

(Annexure - B)
13

No. 2430 dated Harichand the 12/7/2018

To:
The Director General (Extension)
Livestock & Dairy Development Department
Khyber Pakhtunkhwa Peshawar.

Subject: LIST OF METRICULATE AN ABOVE QUALIFICATION OF CLASS-IV STAFF
IN CATTLE BREEDING & DAIRY FARM HARICHAND.

Memo:
Kindly refer your office telephonically message on 11/07/2018 on the above
noted subject.

The requisite information is as under:

NAME WITH FATHER NAME	DESIGNATION	DATE OF BIRTH	QUALIFICATION	DATE OF ENTRY INTO GOVT SERVICE	DOMICILE	PLACE OF POSTING
NAJMOOD RAZA S/O SULTAN MUHAMMAD	MILK MAN	26/2/1986	METRIC	28/06/2005	CHARSADDA	CB & DF HARICHAND
JANSAR S/O MUHAMMAD GUL	MILK MAN	2/3/1979	METRIC	17/01/2009	CHARSADDA	-DO-
JEWAN ZEB S/O GUL ZAMAN	CHOWKIDAR	18/4/1978	METRIC	17/01/2009	CHARSADDA	-DO-
MUHAMMAD IRSHAD S/O MUHAMMAD IQBAL	MILK MAN	20/11/1986	METRIC	17/01/2009	CHARSADDA	-DO-
SHANSHAD S/O BAGHISTAN	BEHISHITI	12/8/1974	B.A	17/01/2009	CHARSADDA	-DO-
MR. YOUSAF SHAH S/O MEHRAB SHAH	MILK MAN	11/3/1980	METRIC	17/01/2009	CHARSADDA	-DO-
MAHMAT ULLAH S/O PHAMAT ULLAH	MILK MAN	15/3/1979	(RABITUL MADRIS)	17/01/2009	CHARSADDA	-DO-
MUHAMMAD ALI S/O BACHA KHAN	MILK MAN	1/3/1975	METRIC	21/01/2009	CHARSADDA	-DO-
AMTAR ALI S/O HAKEEM KHAN	CHOWKIDAR	1/4/1975	METRIC	14/2/2009	CHARSADDA	-DO-
RAHAT SHAH S/O SHER MUHAMMAD	NAIB QASID	8/3/1986	F/A	09/03/2011	MARDAN	-DO-
MR. WAZIR GUL S/O NOORAS GUL	MILK MAN	12/3/1990	F/A	12/03/2011	MALAKAND AGENCY	-DO-
MUHAMMAD USMAN S/O SHERZADA	NAIB QASID	5/2/1978	METRIC	25/05/2015	MALAKAND AGENCY	CB & DF HARICHAND
SHAHID KHAN S/O AMIN ULLAH	CATTLE ATTENDANT	10/4/1994	METRIC	25/05/2015	MALAKAND	-DO-
MUHAMMAD SAJID S/O SADIO SHAH	CHOWKIDAR	1/4/1992	F/A	12/10/2015	MALAKAND AGENCY	-DO-
JAMIL SHAH S/O MUHAMMAD SAID	SWEEPER	1/12/1976	METRIC	01/11/2016	CHARSADDA	-DO-
SAEED ANWAR S/O MAIN SHER	CHOWKIDAR	15/3/1991	METRIC	01/11/2016	MALAKAND AGENCY	-DO-
NASEEM KHAN S/O SIYAR GUL	CATTLE ATTENDANT	14/11/1980	METRIC	01/11/2016	CHARSADDA	-DO-
MUHAMMAD IQBAL S/O SAID	CHOWKIDAR	13/8/1974	METRIC	02/11/2016	CHARSADDA	-DO-

Annexure
[Signature]

(E) 14

ASIF HUSSAIN S/O MOMEN	CATTLE ATTENDANT	15/4/1997	METRIC	02/11/2016	CHARSADDA	-DO-
SABED REHMAN S/O AJAB KHAN	CATTLE ATTENDANT	17/1/1979	METRIC	04/11/2016	MALAKANU AGENCY	-DO-
MUHAMMAD SHARIYAR S/O WAHID GUL	CATTLE ATTENDANT	8/7/1968	FIA	11/02/2017	CHARSADDA	-DO-
ABDUL HUSSAIN S/O USMAN KHAN	CATTLE ATTENDANT	6/7/1986	METRIC F/A	04/08/2014	CHARSADDA	-DO-

(Signature)
for Director,
Cattle Breeding & Dairy
Farm Harichand *(Signature)*

(Signature)

(Signature)

NOTE: ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 11/27/2013 BY [Signature]

Annexure E/13

The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Though the Universities and the department are playing their role, it is not at the level it is supposed to be.

In this regard the following issues are related to Veterinary Education and Research:

- The existing infrastructure of the faculties and laboratories are not sufficient according to the requirements of the degree/certificate programs, thus the graduates are facing difficulties in the field conditions.
- The existing infrastructure of the research establishment is below the required international standards.

Muhammed Asif s/o Marshal Khan

Muhammed Asif s/o Marshal Khan

CNIC 14203-2045073-9

CNIC 14203-2045073-9

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(Answer - E) (16)

The Livestock Research and Development Department is also striving for the betterment of Livestock sector of the province. However in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving.

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The existing infrastructure of the research establishment is below the required international standards.

The Livestock Research and Development Department is also striving for the betterment of Livestock sector of the province.

4, minutes

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Muhammad Asif s/o Mashal Iqbal

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0340 58 23194



(A) 30

Approved
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(E) (17)

Earlier, the Livestock and Dairy Development Department was mandated to provide extension services through its Animal Health work force. Of late, a separate Directorate of Livestock Production Extension and Communication has been established to look after the field extension services. The Directorate of Livestock Production Extension and Communication is also working on human resource management and its development. Due to increased productivity and efficiency of livestock, importance of knowledge in human resource management cannot be underestimated.

Livestock Extension Services and Human Resource Development is constrained by the following issues:

- Inadequate extension services to address the needs of farming communities
- Lack of the use of conventional and modern tools of communication
- Lack of resources to strengthen Farmer Field Schools approach, Livestock Extension through women workers, and need-based trainings

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(E) 18

Earlier, the Livestock and Dairy Development Department was mandated to provide extension services through its Animal Health work force. Of late, a separate Director of Livestock Production Extension and Communication has been established to look after the field extension services. The Director of Livestock Production Extension and Communication is also working on human resource management and its development. Due to increased productivity and efficiency of livestock, importance of knowledge in human resource management cannot be underestimated.

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Yaminullah

12/1/20

[Signature]



30 | *Yaminullah*

فان الله له سنتي ورسول

دائره NO. 21601. 0386314-7

Mob. 0333-5014662

Approved

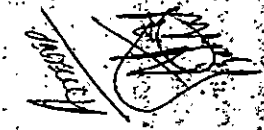
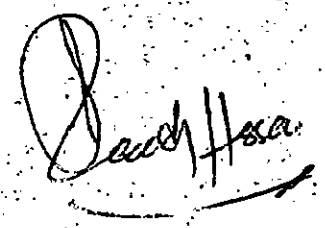
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(E)-19

Biotech Services is a privately held innovative company specialized in marketing medical, Radiology, Cardiology, Surgery and OBS/Gyn Equipment. In the years to come we intend to grow with our core business in existing and new markets. Our employees form a service driven team working for the common goal of the company. Their loyalty, qualifications, competence and training are rewarded and motivated by the management. The management actively supports and guides the team through latest information technology in order to direct the team to achieve the corporate goal. Our clients will be benefitted from this as they will recognize and respect our team for its personal and direct service from all levels of the company, up to the owners themselves.

Name: Saeed ul Hasani

Now: Raz Gul



Biotech services is a privately held innovative held innovative company specialized in marketing medical, Radiology, Cardiology, Surgery and OBS/ Gyn Equipment. In the years to come we intend to grow with our existing and new markets. Our employees form a service driven team working for the common goal of the company. Their loyalty, qualification, competence and training are rewarded and motivated by the management. The management actively supports and guides the team through latest information technology in order to direct the team to achieve the corporate goal. Our clients will be benefitted from this as they will recognize and respect our team for its personal and direct service from all levels of the company, up to the owners themselves.

Biotech services is a privately held innovative company specialized in marketing medical, radiology,

Name: Saeed Al Hessa

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Fi Name: Baz Gul

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(E) 21

The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Though the Universities and the department are playing their role, it is not at the level it is supposed to be.

In this regard the following issues are related to Veterinary Education and Research:

- The existing infrastructure of the faculties and laboratories are not sufficient according to the requirements of the degree/certificate programs, thus the graduates are facing difficulties in the field conditions.
- The existing infrastructure of the research establishment is below the required international standards

[Signature]
AFZANWAR S/O GOHAR ZAMAN
Contact # 0333-337375
CNIC # 17307-1673193-5

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The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholders is the key limiting factor in critical issue effective coordination among relevant stakeholders is the key limiting factor in playing their role, it is not at the level, it is supposed to be.

In this regard the following issues are related to Veterinary Education and Research:

The existing infrastructure of the facilities and laboratories are not sufficient according to the requirements of the degree/certificate programs, thus the graduates are facing difficulties in the field conditions.

The existing infrastructure of the research establishment is below the required international standards.

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AFTAB ANWAR S/O GOHAR ZAMAN

Contact No. 0333-9373735

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(E) (23)

The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Though the Universities and the department are playing their role, it is not at the level it is supposed to be.

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- The existing infrastructure of the research establishment is below the required international standards.

Mr. Waliullah S/O Sardar Khir

14101-0799113-5
0333-9601023

Amir

The Livestock Research and Development Department is also striving for the betterment of Livestock sector of the province. However in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Although the Universities and the department are playing their role, it is not at the level it is supposed to be.

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- The existing infrastructure of the research establishment is below the required international standards.

The Livestock Research and Development Department is also striving for the betterment of Livestock sector of the province. However in the current s

WA
Mr. Waliullah S/o Saeed Khan
14101-0799113-5
0335-8681023

Yamunab Das

30/1/2018

Addressed
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(E) (23)

(b) The role of a central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnose endemic, production-limiting diseases using fit-for-purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern technology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fit for purpose and to emphasise targeted diagnostic testing.

(c) Laboratory diagnosis shall be the mandate of the L&DD Department with certain diagnostic responsibilities being assigned to research institutes.

Zafar Iqbal

Zafar Iqbal

17201-7913898-7

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(a) The role of central laboratory in testing for the major infectious diseases will be emphasized with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnosis endemic, production limiting diseases using fir for purpose test. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fir for purpose and to emphasize targeted diagnostic testing.

(c) Laboratory diagnosis shall be the mandate of the L & dd department with certain diagnostic responsibilities being assigned to research institutes the role of central laboratory in testing for the major infectious diseases will be emphasized with district laboratories

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(b) The role of the central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnose endemic, production-limiting diseases using fit-for-purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern technology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fit for purpose and to emphasize targeted diagnostic testing.

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(a) The role of central laboratory in testing for the major infectious diseases will be emphasized with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnosis endemic, production limiting diseases using fir for purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fir for purpose and to emphasize targeted diagnostic testing.

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The role of central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for confirmation. District laboratories will be strengthened to diagnosis endemic, production limiting diseases and for purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fit for purpose and to emphasise targeted diagnostic testing. Laboratory diagnosis shall be the mandate of the I&DD department with certain diagnostic responsibilities being assigned to research institutes

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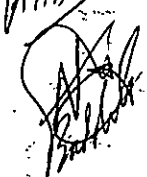
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(b) The role of the central laboratory in testing for the major diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnose endemic, production-limiting diseases. Specialized laboratories will be set up for special diagnostic tests. Rationalization and revamping of diagnostic services will be done to place to adopt more appropriate modern technology. After an audit of the existing capacity and capability and skills will be done to ensure that they are fit for purpose and to plan for targeted diagnostic testing.

(c) Laboratory diagnosis shall be the mandate of the L&D Department with certain diagnostic responsibilities being assigned to research institutions.

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(A) The role of central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnosis endemic, production-limiting diseases using fir for purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fir for purpose and to emphasise targeted diagnostic testing.

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**BEFORE THE KHYBER PAKHTUNKWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1565/2019

Wazir Gul S/O Noorab Gul

(Appellant)

VERSUS

Director General (Ext), Livestock & Dairy Development
Department, Peshawar and Others

(Respondents)

REJOINDER ON BEHALF OF THE APPELLANT

Respectfully Submitted:

The appellant submit his rejoinder as under:

Preliminary Objections:

1. That the appellant has locus standi and got cause of action to file the instant appeal
2. That the appeal is legal and based real facts.
3. That the appellant has cause of action against the respondents.
4. That the Appeal is maintainable in its present form.

ON FACTS:

1. Contents of Para No 1 needs no reply, as admitted by the respondents..
2. Contents of Para 2 needs no reply.
3. Contents of Para 3 needs no reply as admitted correct by the respondents.
4. Contents of Para 4 needs no reply as admitted correct by the respondents.
5. Contents of Para No 5 need no reply.

6. Content of Para No 6 needs no reply as admitted by the respondents.
7. Contents of Para 7 is incorrect and misleading, the appellant has the requisite qualification along with the seniority for promotion, but to adjust their own blue eyed ones, the respondents ignored the case of the appellant and promoted junior to appellant, which clearly shows the Malafide intention of the respondents.
8. Contents of Para 8 needs no reply as admitted correct by the respondents.
9. Contents of Para 9 is incorrect and misleading, the case of the appellant for promotion was not sent to the departmental promotion committee, no interview and no typing test were conducted by respondents department from the appellant.
10. Contents of Para 10 is incorrect, As explained in Para No 9.
11. Contents of Para 11 is Incorrect, As clearly explained in the main appeal.

Grounds

All the grounds are taken are legal and will be argue at the time of hearing

It is, therefore, Most humbly prayed that the *Service Appeal*, of the appellant may please be accepted as prayed for.

Appellant

Through


ZARTAJANWAR
Advocate Peshawar

Affidavit

I, do hereby solemnly affirm and declare that the contents of the *above Rejoinder* are true and correct and that nothing has been kept back or concealed from this Honourable Court.

Deponent