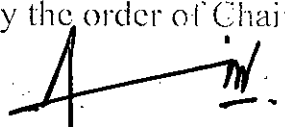


FORM OF ORDER SHEET

Court of _____

Appeal No. 1992/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/10/2023	<p>The appeal of Mr. Amcer Nawaz resubmitted today by Mr. Bilal Ahmad Kakaizai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>4/10/23</u> Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Ameer Nawaz Depot Control Office of the District Director Agriculture Upper Chitral received today i.e. on 20.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellant.
- 2- Appeal has not been flagged/marked with annexure marks.
- 3- Annexures of the appeal are unattested.
- 4- The law under which appeal is filed is not mentioned.
- 5- Annexures of the appeal are not in sequence be annexed serial wise as mentioned in the memo of appeal.
- 6- All the annexures of the appeal are illegible be replaced by legible/better one.
- 7- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3268/S.T.

Dt. 21/9/2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bilal Ahmad Kakaizai Adv.
High Court at Peshawar

All the objections have been addressed
Please put before Court.



BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No: 1992 / 2023

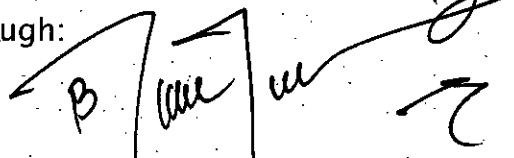
AMEER NAWAZ vs Government of Khyber Pakhtunkhwa etc

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<i>Annexure-B</i>	Educational Testimonials of the Appellant.	10-14
<i>Annexure-C</i>	Seniority List.	15-19
<i>Annexure-D</i>	Departmental Appeal along with Courier Receipt.	20-23
Wakalatnama		

Appellant

Through:


BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

213, Sunehri Masjid Road, Near HBL

Nothia Branch, Peshawar Cantt.

0300-9020098.

**BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No: 1992/2023

7716

20/09/23

AMEER NAWAZ,
Depot Coolie (BPS-1),
Office of the District Director Agriculture,
Upper Chitral.

..... APPELLANT

Versus

- 1. GOVERNMENT OF KHYBER PAKHTUNKHWA,
Through Secretary Agriculture,
Agriculture Department, Civil Secretariat, Peshawar.
- 2. THE DIRECTOR GENERAL,
Agriculture,
Peshawar.
- 3. THE DISTRICT DIRECTOR,
Agriculture,
Upper Chitral.

..... RESPONDENTS

Handwritten signature and date 20/09/23

DEPARTMENTAL APPEAL / REPRESENTATION FOR:

- 1. CORRECTION IN THE SENIORITY LIST OF MATRICULATE CLASS-IV GOVERNMENT SERVANT OF AGRICULTURE (EXTENSION) DEPARTMENT PESHAWARO WHEREBY AGAINST THE NAME OF APPELLANT, IN THE COLUMN OF QUALIFICATION, "MATRIC" HAS BEEN WRITTEN WHEREBY APPELLANT IS HOLDER OF DEGREE OF MASTER OF ARTS IN ECONOMICS FROM UNIVERSITY OF MALAKAND PAKISTAN ALONGWITH CERTIFIED ATTENDENT OF COURSE OF OFFICE AUTOMATION.

**BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No: _____ / 2023

AMEER NAWAZ,
Depot Coolie (BPS-1),
Office of the District Director Agriculture,
Upper Chitral.

..... APPELLANT

Versus

- 1. GOVERNMENT OF KHYBER PAKHTUNKHWA,
Through Secretary Agriculture,
Agriculture Department, Civil Secretariat, Peshawar.
- 2. THE DIRECTOR GENERAL,
Agriculture,
Peshawar.
- 3. THE DISTRICT DIRECTOR,
Agriculture,
Upper Chitral.

..... RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 FOR:**

- 1. CORRECTION IN THE SENIORITY LIST OF MATRICULATE CLASS-
IV GOVERNMENT SERVANT OF AGRICULTURE (EXTENSION)
DEPARTMENT PESHAWARO WHEREBY AGAINST THE NAME OF
APPELLANT, IN THE COLUMN OF QUALIFICATION, "MATRIC"
HAS BEEN WRITTEN WHEREBY APPELLANT IS HOLDER OF
DEGREE OF MASTER OF ARTS IN ECONOMICS FROM UNIVERSITY
OF MALAKAND PAKISTAN ALONGWITH CERTIFIED ATTENDENT
OF COURSE OF OFFICE AUTOMATION.

AND

2. CONSIDERATION FOR PROMOTION TO THE POST OF JUNIOR CLERK AS AGAINST THE QUOTA OF CLASS - IV EMPLOYEES.

Prayer: On acceptance of this appeal, it is requested that the relevant entries in the seniority list may please be replaced with original qualification and Appellant may please be considered for promotion on the basis of his length of service and acquired qualification to the post of junior clerk, with such other relief as may be deem fit in the circumstances of the case may also be granted.

Respectfully Sheweth,

Short facts, giving rise to present Service Appeal, are as under:

1. That, Appellant was appointed as Depot Coolie (BPS-1) by the Competent Authority vide Order dated 13.01.2009, in the Office of the then Executive District Office, Agriculture Chitral, copy of the Appointment Order etc of the Appellant is attached as Annexure A.
2. That, due to excellent performance of the Appellant, he has earned good reputation in his field moreover Appellant is highly qualified person with academic background of Master of Arts in Economics, copies of the Educational Testimonials of the Appellant are attached as Annexure B.
3. That, when the Seniority List of Matriculate Class-IV employees of Agriculture (Extension) Department was circulated, Appellant was shocked to see the column of qualification against his name, in which, his qualification was mentioned as Matric instead of Master of Arts in Economics, copy of the Seniority List is attached as Annexure C.
4. That, when enquired about the wrong entry inserted against the name of the Appellant, the officials were unable to answer the query of the Appellant, hence he submitted his Departmental Appeal before the Competent Authority for the subject purpose,

Filed to-day
Registrar

copies of the Departmental Appeal along with Courier Receipts are attached as Annexure D.

5. That, the Respondents failed to decide the fate of the Departmental Appeal of the Appellant within requisite statutory period, hence this appeal on the following amongst other grounds:

GROUNDS:

- A. That, not correcting the seniority list and not considering the Appellant for promotion to the post of Junior Clerk against the quota of Class-IV Matriculate / Intermediate Pass is illegal, unlawful, void and ineffective.
- B. That, same is against the principles of Natural Justice, also.
- C. That, apart from the wrong entry in the column of qualification in Seniority List, Appellant has also not been considered for promotion to the post of Junior Clerk against the quota reserved for the purpose of promotion of Class-IV Employees, since his Appointment.
- D. That, Appellant has unblemished service record of more than 14 years.
- E. That, the Appellant has been victimized due to no fault on her part.
- F. That, the actions and inactions of the Respondent's Department are against the principles enshrined in the Constitution of Islamic Republic of Pakistan, 1973.
- G. That, entering and showing the correct credentials of the Appellant in the Seniority List is the right of the Appellant which could not be denied.
- H. That, on the basis of entering the correct credentials, the Appellant would automatically become entitle to be

Filed to-day

Registered

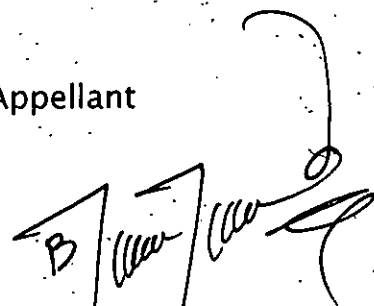
5

considered for the promotion however the Respondents are purposely and malafidely pushing the Appellant behind his colleagues.

It is, therefore, requested that Appeal of the Appellant be accepted as prayed for.

Appellant

Through:



BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.
213, Sunehri Masjid Road, Near HBL
Nothia Branch, Peshawar Cantt.
0300-9020098.

6

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2023

AMEER NAWAZ vs Government of Khyber Pakhtunkhwa etc

AFFIDAVIT


I, AMEER NAWAZ, Depot Coolie (BPS-1), Office of the District Director Agriculture, Upper Chitral, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.

Ahmed
Deponent

Identified by:

Bilal Ahmad Kakaizai

BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.

20 9-23

KHALID MAHMOOD TALPUR
OATH
COMMISSIONER
PESHAWAR HIGH COURT

(7)

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2023

AMEER NAWAZ vs **Government of Khyber Pakhtunkhwa etc**

ADDRESSES OF PARTIES.

APPELLANT:

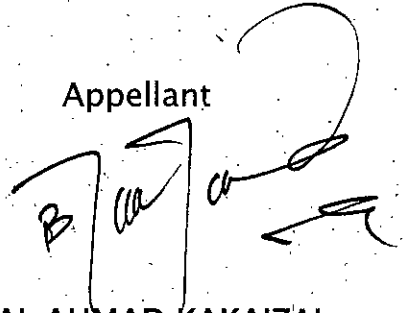
AMEER NAWAZ, Depot Coolie (BPS-1), Office of the District Director
Agriculture, Upper Chitral.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa, Through Secretary
Agriculture, Agriculture Department, Civil Secretariat, Peshawar.
2. The Director General, Agriculture, Peshawar.
3. The District Director, Agriculture, Upper Chitral.

Appellant

Through:



BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

213, Sunehri Masjid Road, Near HBL

Nothia Branch, Peshawar Cantt.

0300-9020098.

8A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER AGRICULTURE CHITRAL

ORDER

As recommended by the Departmental Promotion/Recruitment Committee in its meeting held on 26-11-2008 in the office of Executive District Officer Agriculture Chitral the following candidates are hereby appointed against the vacant posts of Depot Coolie BPS-01 on regular contract basis as admissible under the rule (Amendment Rule 2001) in the office District Officer Agriculture Extension Chitral.

S.No	Name & Address	Designation with BPS
1	Mr. Abdul Khaliq S/o Fazal Samdani R/o Broze Kore Tehsil & District Chitral.	Depot Coolie BPS-01(2970-90-5670)
2	Mr. Amir Nawaz Khan, S/o Zabar Khan R/o Dukandeh Booni Tehsil Mastuj District Chitral.	Depot Coolie BPS-01(2970-90-5670)
3	Mr. Rehmat Afzal S/o Mubarak Khan R/o Manoor Lotkoh Tehsil & District Chitral.	Depot Coolie BPS-01(2970-90-5670)

Their appointments shall be subject to the following terms & conditions.

1. They shall be on probation for a period of 6 months. On successful completion of their probation period their service shall be regularized. Otherwise their service can be terminated during the probation period.
2. Their appointment shall be subject to production of medical fitness certificate issued by the Medical Superintendent DHQ Hospital Chitral.
3. They shall be governed by such rules, regulations, order, acts and ordinance etc. relating to their appointment, transfer, level, efficiency and discipline and conduct as have been/may be prescribed by the government for the category of government servant of their status from time to time.
4. Their service shall be liable to terminated at any time in case of infringement of the rules, laws and terms and if their performance is found not satisfactory.
5. They shall not be entitled to any pension/gratuity.
6. 10% CP fund shall be deducted from their monthly pay in accordance with NWFP Civil Servants (Amendment) act-2005.

**Sd/-(Mahmood Khan)
Executive District Officer
Agriculture Chitral.**

No/06-13 /16/32/EDO, Agri:

Dated Chitral the 13/01/2009.

Copy to:

1. The District Coordination Officer Chitral.
2. The Director General Agriculture Extension Govt. of NWFP Peshawar.
3. The Executive District Officer Finance & Planning Chitral.
4. The District Accounts Officer Chitral.
5. The District Officer Agriculture Extension Chitral.
6. Officials concerned.

**Mahmood Khan
Executive District Officer
Agriculture Chitral.**

9

**OFFICE OF THE
DISTRICT DIRECTOR AGRICULTURE
UPPER CHITRAL**

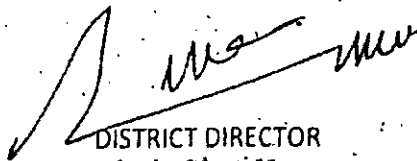
Agriculture Extension
Government of
Khyber Pakhtunkhwa

Tel: 0943-470501; Fax: 0943-470501; E-mail: ddachitral@gmail.com

No 19 // DDA CHITRAL UPPER Dated the 15/ 02/ 202

TO WHOM IT MAY CONCERN

Mr. Amir Nawaz has been working as a class-iv employee in the Agriculture Extension department District Chitral Upper since very long and he has earned a great reputation in the field activities of Agriculture. He is a highly qualified personal with academic background in M. Sc. Economics. Even a single member of ministerial staff was not posted in this very newly to run the official business of the office during my posting on March 30th, 2021 till date as a District Director, Agriculture Department District Upper. The task was assigned to Mr. Amir Nawaz Class-iv for managing and running the day today official work in the absence of a ministerial body to overcome the shortcomings and hardships being faced by this office till further order. It gives me immense pleasure to write that I had found him very hardworking and dedicated with excellent communication skills, decisive powers, analytical abilities and clear vision towards his work. He carried out his job with a very exceptional approach and came across successfully in No. /DDA (E) dated Chitral Upper the / /2021 routine matters as well as in special tasks assigned to him in the office management work in addition to his own primarily duty to work in the field with a farming community, simultaneously. I am confident that Mr. Amir Nawaz, Class-iv employee of this office has proved to be an asset to the Department and he will be an excellent candidate for any position in the ministerial categories if he has been considered or given a chance. I have no hesitation in recommending him for the post of junior clerk, junior stenographer or assistant as he is well aware of the duties that he needs to perform and familiar with the measures and facts that are needed for such types of assignments.


DISTRICT DIRECTOR
District Director
AGRICULTURE CHITRAL UPPER

10 B

S.No. 308862

Roll No 116492



Board of Intermediate and Secondary Education
Peshawar N.W.F. Pakistan

Secondary School Certificate Examination
SESSION 2004 - ANNUAL
(Humanities Group)

This is to Certify that Amir Nawaz Son / Daughter of Zabar Khan
and a student of Govt High School Booni Chitral has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2004 as a Regular
candidate. He / She obtained 486 Marks out of 850 and has been placed in Grade C Representing Good
The Candidate passed in the following subjects:
1. English 2. Urdu 3. Islamiyat 4. Pakistan Studies 5. Mathematics 6. General Science 7. Islamic Studies 8. Civics
Date of birth according to admission form March 06, 1987

Asst Secretary

Secretary

This certificate is issued without alteration or abrogation.

11

S.No. 184281

Roll No. 68499

Group. Humanities



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION

SESSION 2006- ANNUAL



This is to Certify that Amir Nawaz *Son of* Zabar Khan
and a student of Govt College Chitral *Registered No.* 065-B/CHT-2004
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2006 *as a* Regular *candidate. He obtained* 638 *Marks out of 1100 and*
has been placed in grade C *Representing* Good *. The examination was taken as a whole.*

Asstt Secretary

16

Jamil
Secretary

This certificate is issued without alteration or erasure.

12



UNIVERSITY OF MALAKAND

PAKISTAN
DETAILED MARKS CERTIFICATE

S.No. 13644

Name: AMIR NAWAZ
Father's Name: ZABAR KHAN
Registration No. 2006580056

G.D.C Chitral



Roll No. 52743

B.A PART-II ANNUAL EXAMINATION, 2008

Subject Name	Total Marks	Marks Obtained	Remarks
ECONOMICS	75	46	PASSED
ENGLISH(C)	75	34	PASSED
STATISTICS	75	31	PASSED
PAK. STUDY	46	18	PASSED
BA PART-I MARKS	285	154	PASSED
<small>Subject Passing Percentage 32 (Theory & Practice Separately), Aggregate Percentage 15</small>		550	273

Examination Held in: July 23---Jul 24, 2008

Result Declared on 18-Sep-2008



Errors and Omissions are subject to subsequent rectification
Examination was taken as a whole/in parts

Date of Issue: 18-Sep-2008

Prepared by: Amjad Shaukat

Jahangir Khan
Controller of Examinations
University of Malakand



University of Malakand Pakistan

DETAILED MARKS CERTIFICATE

Serial No. 029577

Name: AMIR NAWAZ
 Father's Name: ZABAR KHAN
 Registration No. 2006580056
 College/District: Private Candidate District Chitral
 Address: Vill: Bouni Dockandeh Tsh: Mastuj Distt: Chitral

Master of Arts in Economics

Roll Number: 1110 Annual Examination 2012

Subject Name	Previous	Maximum Marks	Obtained Marks	Remarks
Paper-I	MICRO ECONOMICS	100	40	PASSED
Paper-II	MACRO ECONOMICS	100	40	PASSED
Paper-III	MATHEMATICS FOR ECONOMISTS	100	41	PASSED
Paper-IV	BASIC STATISTICS & RESEARCH METHODS	100	62	PASSED
Paper-V	PUBLIC FINANCE & MONETARY ECONOMICS	100	47	PASSED
Examination held from Jun 27 to Jun 23, 2012		Result declared on 27-Dec-2012		500 / 230

Roll Number: 1104 Annual Examination 2014

Subject Name	Final	Maximum Marks	Obtained Marks	Remarks
Paper-VI	ECONOMETRICS	100	40	PASSED
Paper-VII	DEVELOPMENT ECONOMICS	100	40	PASSED
Paper-VIII	MANAGERIAL ECONOMICS	100	52	PASSED
Paper-IX	THE ECONOMY OF PAKISTAN	100	42	PASSED
Paper-X	AGRICULTURAL ECONOMICS	100	64	PASSED
Paper-XI	INTERNATIONAL ECONOMICS	100	65	PASSED
VIVA VOCE		100	65	PASSED
Examination held from Aug 12 to Sep 11, 2014		Result declared on 27-Nov-2014		700 / 368

Result Status:	Passed	1200	598	2nd Division
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The examination was taken *in Parts*
 Errors and Omissions are subject to subsequent rectification.

Issuance Date: 01-Dec-2014

Prepared by: Amjad Shabzad

Checked by:

Controller of Examinations
 University of Malakand

14

APTECH

It's more than an education it's a career.
INSTITUTE OF INFORMATION TECHNOLOGY
Affiliated with: NWFP BTE, TTB, SDC. Govt. of Pakistan

Reg No. AP/CER/6099

S. No. 6099

Certificate

-- This Is To Certify That --

Mr/Ms AMIR NAWAZ

Son/Daughter of ZABAR KHAN

Successfully Completed Course of
OFFICE AUTOMATION

He/She secured 84% Marks and placed in grade A+

From 01/01/09 To 01/04/09

In recognition thereof, this certificate is awarded to him/her

On 20TH Day of April-2009

Principal
INSTITUTE OF IT
Affiliated with TTB, B.T.E
Govt. of Pakistan.

[Signature]
Principal

[Signature]
Controller of Exam.



14

Amid Nawaz is at Serial No. 53

**TENTATIVE SENIORITY LIST OF MATRICULATE CLASS-IV GOVERNMENTSERVANT OF AGRICULTURE (EXTENSION)
DEPARTMENT KHYBER PAKHTUNKHWA, PESHAWAR AS STOOD ON 01.01.2022**

15

S.No	Name & Designation	Designation	Date of Birth	Date of appointment as class-IV	Qualification	Place of posting	Remarks
1.	Hazrat Qayum	N/Qasid	02.04.1963	06.07.1987	Matric	DDA Dir Lower	
2.	Allah Nawaz	Chowkidar	01.08.1965	09.12.1987	F.A	DDA D.I.Khan	
3.	Liaq Jan	S/Keeper	06.07.1969	13.08.1991	F.A	DDA (TD) Bajour	
4.	Muhammad Pervish	F/Worker	12.12.1968	06.10.1996	Matric	DDA Swat	
5.	Wahid Ullah	F/Worker	14.09.1980	01.07.2002	B.A	MA Peshawar	
6.	Shakeel Arshad	N/Qasid	05.01.1976	01.09.2002	B.A	MA Peshawar	
7.	Wahid Gul	Chowkidar	10.03.1982	29.07.2003	F.A	DDA Merged Areas	
8.	Qasim Khan	D/Keeper	30.09.1981	09.08.2003	Matric	DDA (TD) Khyber	
9.	Ishaq Zada	F/Worker	10.02.1972	16.10.2003	Matric	DDA Shangla	
10.	Muhammad Sadaqat		05.05.1984	04.02.2004	Matric	DDA Kohat	
11.	Muhammad Ishfaq Khan	Daftari	04.04.1975	13.04.2004	Matric	DDA A/ Abad	
12.	Muhammad Azam Khan	N/Qasid	06.08.1974	15.04.2004	Matric	DDA Dir Lower	
13.	Rahim Ullah	D/Cooli	03.07.1974	17.04.2004	M.A	DDA Dir Lower	
14.	Sher Muhammad	D/Cooli	01.05.1983	26.04.2004	Matric	DDA Swat	
15.	Said Azeem Khan	N/Qasid	02.01.1979	30.04.2004	Matric	DDA Dir Upper	
16.	Ehsan Ahmad (Masih)	Sweeper	06.04.1974	03.07.2004	B.A	ASA Peshawar	
17.	Muhammad Ismail	N/Qasid	10.04.1982	09.12.2004	F.A	DA Merged Areas	
18.	Niamat Ullah	F/Worker	21.07.1980	11.06.2006	Matric	DDA Malakand	
19.	Muhammad Tahir	F/Worker		14.07.2006	M.A	DDA Charsadda	
20.	Faiz Ullah Khan		03.10.1973	29.07.2006	Matric	DDA Kohat	
21.	Zaigham Abbas		03.08.1981	14.11.2006	M.A	DDA D.I.Khan	
22.	Muhammad Ramzan	Chowkidar	15.01.1988	22.11.2006	F.A	DDA D.I.Khan	
23.	Atta Muhammad	F/Worker	04.02.1968	23.11.2006	Matric	DDA Batagram	
24.	Muhammad Halim	F/Worker	03.08.1977	23.11.2006	Matric	DDA Batagram	
25.	Zai Ullah Khan	F/Worker	03.07.1987	23.11.2006	Matric	DDA Batagram	
26.	Iftikhair Ahmad	N/Qasid	02.01.1980	08.12.2006	M.A	DDA Manshera	
27.	Naiz Ali	F/Worker		09.12.2006	Matric	DDA Nowshera	
28.	Muhammad Raheem	F/Worker	03.01.1975	19.02.2007	Matric	DDA Dir Lower	
29.	Mehmood Ul Haq	N/Qasid	01.03.1978	01.03.2007	BA	DDA Shangla	
30.	Saifullah	F/Worker	01.10.1981	21.03.2007	Matric	DDA Batagram	
31.	Shahid Ullah	F/Worker	10.01.1978	27.03.2007	MA	DDA Bannu	
32.	Raza Ullah	F/Worker		31.03.2007	Matric	DDA Charsadda	
33.	Sajid Ali	F/Worker	06.04.1985	07.07.2007	BA	DDA Swabi	
34.	Muhammad Ibrahim	F/Worker	13.05.1988	10.08.2007	Matric	DDA DI Khan	
35.	Javid Ali		16.02.1976	05.10.2007	Matric	DDA Kohat	

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36.	Shakreen		11.02.1980	05.10.2007	B.A	DDA Kohat	
37.	Muhammad Aslam	Chowkidar	20.03.1969	25.07.2007	Matric	DDA D.I.Khan	
38.	Jehangir Shah		25.09.1978	27.05.2008	Matric	DDA Charsadda	
39.	Abdul Waheed	F/Worker		07.06.2008	Matric	DDA Nowshera	
40.	Ayaz ud Din		15.08.1987	08.06.2008	Matric	DDA Kohat	
41.	Imran Ullah	F/Worker	16.03.1988	14.06.2008	Matric	DDA Peshawar	
42.	Muhammad Jan	F/Worker	15.01.1987	26.07.2008	Matric	DDA Charsadda	
43.	Nisar Muhammad	N/Qasid	16.10.1989	03.08.2008	B.A	ASA Peshawar	
44.	Haider Hayat	F/Worker	16.02.1986	04.08.2008	F.A	JDDA Nowshera	
45.	Noor Zeb Khan	F/Worker	15.05.1977	29.08.2008	F.A	DDA Bunner	
46.	Aseem Khan	F/Worker	04.06.1979	29.08.2008	F.A	DDA Bunner	
47.	Abdul Khaliq	N/Qasid		01.11.2008	F.A	DDA Tank	
48.	Muhammad Ishtiaq	F/Worker	19.04.1985	17.11.2008	Matric	DDA Hangu	
49.	Naeem Dad	N/Qasid	08.08.1978	02.12.2008	Matric	DDA D.I.Khan	
50.	Tanveer Akhtar	N/Qasid	23.12.1989	01.01.2009	B.A	DDA Haripur	
51.	Sajjad Ahmad	N/Qasid	09.01.1982	12.01.2009	B.A	DDA Karak	
52.	Bashir Ahmad	F/Worker	01.02.1987	13.01.2009	F.A	DDA Chitral	
53.	Amir Nawaz	D/Cooli	06.03.1987	13.01.2009	Matric	DDA Chitral	
54.	Umar Hayat	Chowkidar	02.12.1979	18.01.2009	Matric	DDA Malakand	
55.	Gul Zar	F/Worker	04.04.1978	20.01.2009	Matric	DDA Haripur	
56.	Khan Dad	F/Worker	16.09.1974	28.01.2009	Matric	DDA Bunner	
57.	Waheed Akhtar	F/Worker	04.11.1976	01.03.2009	Matric	DDA Haripur	
58.	Shah Nawaz	F/Worker	15.03.1980	01.03.2009	Matric	DDA Haripur	
59.	Saqib Mushtaq	N/Qasid	22.06.1981	28.03.2009	B.A	DDA A/ Abad	
60.	Adnan Ahmad	N/Qasid	28.12.1985	28.03.2009	Matric	DDA A/ Abad	
61.	Muhammad Sultan		25.03.1985	04.04.2009	Matric	DDA Charsadda	
62.	Irfan Ullah S/O Waheed Gul	F/Worker	08.09.1986	17.06.2009	F.Sc	DDA Charsadda	
63.	Noor Rehman S/O Muhammad Nazir	F/Worker	12.04.1990	17.06.2009	F.Sc	DDA Mohmand	
64.	Zareen Shah S/O Abdullah Shah	N/Qasid	01.01.1968	16.07.2009	Matric	DG Office	
65.	Ubaid Ullah	F/Worker	02.05.1988	16.07.2009	B.A	DDA Bajour	
66.	Shams ur Rehman	F/Worker	16.02.1987	26.08.2009	B.A	DDA D.I.Khan	
67.	Hidayat Ullah	F/Worker		29.10.2009	F.A	DDA Peshawar	
68.	Inam Ullah	F/Worker	06.03.1976	05.11.2009	D.Cpm	DDA Bannu	
69.	Muhammad Jan	F/Worker	10.05.1973	30.12.2009	Matric	DDA Charsadda	
70.	Asif Khan		04.02.1990	06.01.2010	Matric	DDA Kohat	
71.	Asif Ayaz	F/Worker	20.01.1990	21.01.2010	Matric	DDA, Swabi	
72.	Shah Khalid	F/Worker	03.02.1990	27.01.2010	Matric	DDA, Swabi	
73.	Irshad Ali	F/Worker	15.03.1991	03.02.2010	FA	DDA, Swabi	
74.	Muhammad Dawood Jan		04.06.1974	05.03.2010	Matric	DDA Dir Upper	
75.	Imran Khan	F/Worker	01.04.1982	29.03.2010	Matric	DDA Charsadda	
76.	Muhd Dawood Jan	N/Qasid	06.04.1974	30.04.2010	Matric	DDA Dir Upper	
77.	Shahid Ali	F/Worker	03.03.1988	21.05.2010	F.A	DDA Hangu	
78.	Khurshed Ahmad	Sweeper	21.04.1982	11.06.2010	Matric	DDA Buner	

MA Economics
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79	Khyal Muhammad	S/Keeper	04.04.1979	21.06.2010	Matric	DDA Buner
80	Muhammad Saleem	Chowkidar	12.09.1974	23.05.2010	Matric	DDA Buner
81	Faizan Ali	F/Worker	03.04.1987	12.07.2010	F.A	DDA Swat
82	Mateen ur Rahman	F/Worker	18.03.1977	12.09.2010	Matric	DDA Manshera
83	Sardar Bahadar	F/Worker	15.08.1966	12.11.2010	Matric	DDA Manshera
84	Mr Gul Shan Din	F/Worker	05.04.1979	01.01.2011	Matric	DDA karak
85	Inshad Khan		05.03.1977	11.01.2011	Matric	DDA Mardan
86	Muhammad Idress Bacha	N/Qasid	05.03.1984	11.01.2011	F.A	DDA Mardan
87	Sufyan	S/Keeper	01.05.1989	01.02.2011	Matric	DDA Buner
88	Munir Javed	Chowkidar	01.02.1993	01.01.2011	Matric	DDA Dir Upper
89	Dasrat Khan	F/Worker	21.02.1993	22.02.2011	Matric	DDA D.I.Khan
90	Syed Mas Ullah Shan	T/W Opt	21.04.1982	24.03.2011	B.A	DDA Bannu
91	Hidayat Ullah	F/Worker	07.05.1959	03.05.2011	F.A	DDA Lakkimarwat
92	Wasim Khan	S/Keeper	01.02.1992	01.06.2011	Matric	DDA Nowshera
93	Javed Iqbal	N/Qasid	16.04.1988	14.06.2011	F.A	DDA D.I.Khan
94	Muhammad Shabir		19.03.1978	18.08.2011	Matric	DDA Manshera
95	Gul Savaif F/Worker	F/Worker	11.08.1978	01.12.2011	B.A	DDA Charsadda
96	Tawab Ali Store Keeper	S/Keeper	06.04.1990	01.10.2011	B.A	DDA Buner
97	Syed Shan Haroon	F/Worker	04.01.1951	21.12.2011	Matric	DDA Mardan
98	Aurangzaib	F/Worker	02.03.1983	21.12.2011	Matric	DDA Mardan
99	Muhammad Javid		02.01.1993	02.01.2012	Matric	DDA Dir Upper
100	Namat Ullah	F/Worker	24.10.1986	03.01.2012	Matric	DDA Hangu
101	Muhammad Shahid	F/Worker	22.03.1988	29.02.2012	F.A	DDA Lakkimarwat
102	Pir Azam Jan	F/Worker	02.08.1994	14.03.2012	Matric	DDA Charsadda
103	Syed Umer Ullah Shah	N/Qasid	08.07.1988	22.03.2012	F.A	ASA Peshawar
104	Imran Ali Khan	F/Worker	01.01.1987	24.03.2012	Matric	DDA Buner
105	Mian Zareen Shah	F/Worker	05.10.1991	24.03.2012	F.A	DDA Buner
106	Asraf Ali	F/Worker	27.01.1985	26.04.2012	Matric	DDA Peshawar
107	Amanat Ur Rehman	F/Worker	20.08.1986	26.04.2012	Matric	DDA Peshawar
108	Asraf Ali	F/Worker		26.04.2012	F.A	DDA Peshawar
109	Mukhtar Ali	Mess Boy	24.02.1981	28.04.2012	Matric	ASA Peshawar
110	Aman Ullah	S/Keeper	01.02.1986	21.05.2012	BSc	Dir Agri Information
111	Muhammad Waqas	F/Worker	09.08.1990	26.06.2012	Matric	DDA Charsadda
112	Said Mehmood	Cleaner	05.03.1993	13.08.2012	Matric	DDA Kohat
113	Doraj Khan	F/Worker		17.09.2012	B.A	DDA Kohistan
114	Sadbar Khan	F/Worker		17.09.2012	B.A	DDA Kohistan
115	Imran Ullah	F/Worker		17.09.2012	Matric	DDA Kohistan
116	Ghulam Ullah Chowkidar	Chowkidar		17.09.2012	Matric	DDA Kohistan
117	Aurangzaib Chowkidar	Chowkidar		17.09.2012	F.A	DDA Kohistan
118	Muhammad Shafi	F/Worker	05.01.1982	18.09.2012	Matric	AAO Mohmand
119	Saiful Islam	F/Worker	03.06.1977	24.09.2012	Matric	DDA Balagram
120	Zia Ullah	N/Qasid	22.04.1989	05.10.2012	Matric	DDA D.I.Khan
121	Ameer Sohail	T/WOper	21.04.1994	20.11.2012	FA	DDA D.I.Khan

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122.	Haseeb Ahmad Raza		15.09.1990	22.11.2012	Matric	DDA Karak
123.	Farooq Khan	N/Qasid	14.06.1993	21.02.2013	F.A	QA(MA), Peshawar
124.	Aftab Ali	F/Worker	05.02.1980	03.06.2013	Matric	DDA Mardan
125.	Tariq Muhammad	F/Worker	18.04.1979	01.01.2014	Matric	DDA Bunner
126.	Ali Rahman	N/Qasid	01.04.1989	21.03.2014	Matric	DDA Shangla
127.	Mohibullah	Typist	01.04.1990	19.05.2014	F.A	DDA Charsadda
128.	Sajeed Gul	Helper	06.01.1980	24.06.2014	Matric	DA (Information)
129.	Shahid Ali	F/Worker	15.02.1987	07.07.2014	Matric	DDA Nowshera
130.	Misbah Ullah	F/Worker	13.02.1992	07.07.2014	F.A	DDA Nowshera
131.	Zahoor Ahmad	N/Qasid	04.11.1978	07.08.2014	F.A	DGA Office
132.	Muhammad Zeeshan	O/Attendant	01.12.1992	27.08.2014	Matric	DDA D.I.Khan
133.	Tufail Ahmad	Cleaner	01.02.1971	30.10.2014	Matric	DDA Peshawar
134.	Sadaqatullah	N/Qasid	25.05.1994	07.11.2014	Matric	DG Office
135.	Mutasimbillah	F/Worker	05.02.1995	26.12.2014	Matric	DDA Shangla
136.	Sahib Zada	F/Worker	20.07.1998	29.12.2014	F.A	DDA Shangla
137.	Ifthikhar Ahmad			06.01.2015		
138.	Sami Ur Rehman, Naib Qasid	N/Qasid	20.02.1994	12.01.2015	F.A	DDA Buner
139.	Mehar Nawaz	F/Worker	08.04.1971	11.02.2015	Matric	DDA D.I.Khan
140.	MuhdSaiyab	F/Worker	03.05.1992	24.02.2015	F.A	DDA Peshawar
141.	Raees Ahmad	Chowkidar	30.12.1992	01.05.2015	Matric	DDA Shangla
142.	Mehran Zaman	F/Worker	08.09.1994	04.06.2015	F.A	DDA Bannu
143.	Abdul Waheed	F/Worker	02.04.1991	17.06.2015	F.A	DDA Mardan
144.	Wasem Shah	F/Worker	07.03.1992	18.06.2015	Matric	DDA Kohat
145.	Mumtaz Jamal	Trasher Op.	10.03.1987	24.07.2015	Matric	DDA Dir Lower
146.	Muhammad Nazeer	Cook	01.01.1978	24.11.2015	Matric	ASA Peshawar
147.	Rizwan Ullah	F/Worker	21.11.1982	02.02.2016	Matric	DDA Karak
148.	Hilal Murad	F/Worker		03.02.2016	Matric	DDA Charsadda
149.	Khalid Qudoos	F/Worker	11.04.1986	04.02.2016	Matric	DDA Karak
150.	Sabir Nawaz	F/Worker	10.08.1987	04.02.2016	Matric	DDA Karak
151.	Sadiq Ul Hassan	T/WOper.	17.02.1981	10.02.2016	Matric	DDA, DIKhan
152.	Qaiser Aziz	Chowkidar	07.04.1984	10.02.2016	FA	DDA, DIKhan
153.	Sher Baz	F/Worker	09.02.1985	10.02.2016	Matric	DDA, DIKhan
154.	Muhammad Ali	T/Cleaner	25.03.1986	22.02.2016	Matric	DDA D.I.Khan
155.	Hasan Ali	F/Worker	17.10.1986	04.03.2016	Matric	DDA Nowshera
156.	Latif Ullah	F/Worker	02.07.1987	04.03.2016	Matric	DDA Nowshera
157.	Waqar Khan	F/Worker	01.09.1988	04.03.2016	B.A	DDA Nowshera
158.	Jawad Khan	F/Worker	06.03.1995	04.03.2016	Matric	DDA Nowshera
159.	Amir Nawaz	Chowkidar	01.01.1991	24.03.2016	Matric	DDA, Hangu
160.	Azher Shahzad	S/Guard	20.04.1987	04.04.2016	Matric	DDA BAI Peshawar
161.	Syed Ishfaq Aman	F/Worker		11.04.2016	MSC	DDA, Charsadda
162.	Muhammad Khalid	F/Worker		08.08.2016	B.Ed	DDA, DIKhan
163.	Irfan Ullah	N/Qasid	11.07.1990	09.09.2016	B.A	DG Office
164.	Ghaffar Shah	F/Worker	06.07.1985	27.09.2016	B.A	DDA Bataqram

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165.	Saifullah	F/Worker	20.02.1985	25.01.2017	BA	DDA, Swat
166.	Ihsanullah	F/Worker	12.02.1986	25.01.2017	Matric	DDA, Swat
167.	All Aman	F/Worker	18.02.1993	01.03.2017	Matric	DDA, Peshawar
168.	Muhammad Kamal	F/Worker	07.03.1998	17.06.2017	Matric	DDA, Mardan
169.	Muht Naveed	N/Qasid	10.01.1989	13.07.2017	M.A	DDA, DIKhan
170.	Ghulam Subhan	F/Worker	08.09.1978	07.09.2017	B.A	DDA D.I Khan
171.	Ihsanullah	F/Worker	02.02.1983	20.09.2017	B.A	DDA Batagram
172.	Irfan Shah	F/Worker	30.03.1997	20.09.2017	Matric	DDA Batagram
173.	Tahir Iqbal	F/Worker	05.12.1986	03.10.2017	Matric	DDA, Kohat
174.	Ajmal Khan	Attendant	02.04.1995	03.10.2017	Matric	DDA, Kohat
175.	Salman Naeem	F/Worker	02.09.1991	19.12.2017	BA	DDA, Swat
176.	Yousaf Khan Yousafzai	F/Worker	25.01.1978	21.12.2017	Matric	DDA, Peshawar
177.	Manzoor Hussain	F/Worker	03.02.1983	21.12.2017	Matric	DDA, Peshawar
178.	Muhammad Nadeem	F/Worker	15.04.1992	21.12.2017	Matric	DDA, Peshawar
179.	Bilal Ahmad	F/Worker	02.01.1994	21.12.2017	Matric	DDA, Peshawar
180.	Muhammad Asif Ullah	N/Qasid	24.03.1990	31.01.2018	B.A	DGA Office
181.	Fahim Ullah	N/Qasid	13.04.1981	27.02.2018	B.A	MA Peshawar
182.	Yar Said		01.01.1980	11.04.2018	Matric	DDA Swat
183.	Mazhar Ur Rehman	T/WOper	29.03.1989	04.07.2018	B.A	DDA D.I Khan
184.	Shahzeb S/O Shah Faisal		30.03.1996	12.11.2018	BBA	DDA Kohat
185.	Waqas Mehmood S/O Arshad Mehmood		07.04.1993	14.03.2019	B.A	DDA Kohat
186.	Zaka Ullah	S/Guard	10.04.1979	29.05.2019	B.A	DDA Peshawar
187.	Seemab Qureshi	N/Qasid	02.03.1997	19.07.2019	F.A	DDA DI Khan
188.	Abdur Rasheed	Attendant	23.02.1995	19.07.2019	F.A	DDA DI Khan
189.	Adil Khan	F/Worker	12.04.1998	25.09.2020	F.A	DDA Peshawar
190.	Syed Kaleem Ullah	N/Qasid	01.02.1994	01.01.2020	F.A	BAI
191.	Adil Khan	F/Worker	12.04.1998	25.09.2020	F.A	DDA Peshawar

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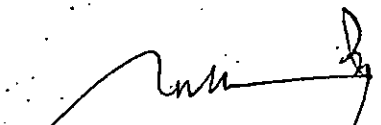
Endst. No.18/29/Est/ /DGA(E)


DIRECTOR GENERAL
 Dated Peshawar: the 31/01 /2021

Copy forwarded to: -

1. The Principal, Agriculture Services Academy, Peshawar.
2. The Director Agriculture Extension Merged Areas Hayatabad Peshawar.
3. All District Directors Agriculture in Khyber Pakhtunkhwa.

For information and necessary action.


DIRECTOR GENERAL

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To

1. THE DIRECTOR GENERAL,
Agriculture, Peshawar.
2. THE DISTRICT DIRECTOR,
Agriculture Upper Chitral.

Through Proper Channel:

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION FOR:

1. CORRECTION IN THE SENIORITY LIST OF MATRICULATE CLASS-IV GOVERNMENT SERVENT OF AGRICULTURE (EXTENSION) DEPARTMENT PESHAWARO WHEREBY AGAINST THE NAME OF APPELLANT, IN THE COLUMN OF QUALIFICATION, "MATRIC" HAS BEEN WRITTEN WHEREBY APPELLANT IS HOLDER OF DEGREE OF MASTER OF ARTS IN ECONOMICS FROM UNIVERSITY OF MALAKAND PAKISTAN ALONGWITH CERTIFIED ATTENDENT OF COURSE OF OFFICE AUTOMATION.

AND

2. CONSIDERATION FOR PROMOTION TO THE POST OF JUNIOR CLERK AS AGAINST THE QUOTA OF CLASS - IV EMPLOYEES.

Prayer: On acceptance of this appeal, requested that the relevant entries in the seniority list may please be replaced with original qualification and Appellant may please be considered for promotion on the basis of his length of service and acquired qualification to the post of junior clerk.

Respected Sir,

I, AMEER NAWAZ, Depot Coolie (BPS-3), Office of the District Director Agriculture Upper Chitral, submit instant Departmental Appeal / Representation for your honors sympathetic and benevolent considerations, as under:


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1. That, Appellant was appointed as Depot Coolie (BPS-3) by the Competent Authority vide Order dated 13.01.2009 in the Office of the then Executive District Office Agriculture Chitral.
2. That, due to excellent performance of the Appellant, he has earned good reputation in the field moreover Appellant is highly qualified person with academic background of Master of Arts in Economics.
3. That, when the Seniority List of Matriculate Class-IV employees of Agriculture (Extension) Department was circulated, Appellant was shocked to see the column of qualification against the name of Appellant, in which, the qualification of the Appellant was mentioned as Matric instead of Master of Arts in Economics.
4. That, when enquired about the wrong entry inserted against the name of the Appellant, the officials were unable to answer the query of the Appellant.
5. That, apart from the wrong entry in the column of qualification in Seniority List, Appellant has also not been considered for promotion to the post of Junior Clerk against the quota reserved for the purpose of promotion of Class-IV Employees since his Appointment.
6. That, Appellant has unblemished service record of more than 14 years.

It is, therefore, requested that Appeal / Representation of the Appellant be accepted as prayed for.

Thanking you,

Yours Faithfully


(AMEER NAWAZ) 24/05/2023
Depot Coolie (BPS-3),
Office of the District Director
Agriculture, Upper Chitral

Shipment Information		Client Information		Price Information		KPRA
Tracking No. 552574559		Consignee: <i>maestro de...</i>		Weight: <i>2.0</i>		
Origin:	Destination:	Address: <i>Ciudad de...</i>		Dimension:	Charged Weight:	
Booking Date:		Contact:		Value Declared:	Insurance:	
Booking Time:		Shipper: <i>Sh...</i>		Net Amount:	KPRA Sales Tax (6%):	
Route Code:		Address:		Payable Amount:	Description:	
NTN No.: <i>2824502-4</i>	Sales Tax Reg No.: <i>2824502-4</i>	Contact:				
*Leopard's Accepted Above Mentioned Items On Shipper Risk & Shipper Agreed All the Conditions Printed On Reverse		NTN:				
Leopard's Sign		CNC:				

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بعدالرت جناب خیبر پختونخواہ سروس ٹریبیونل، پشاور

مورخہ
مقدمہ
دعویٰ

منجانب
نام
Govt. of KPK etc.

امیر نواز

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور کے لیے
بلال احمد ککزئی ایڈووکیٹ سپریم کورٹ آف پاکستان مقرر کر کے اقرار کیا جاتا ہے۔ کہ وکیل
موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف
دینے، جواب دہی اور اقبال و دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی و دعویٰ اور
درخواست ہر قسم کی تصدیق و زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی
برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از ضرورت مقدمہ مذکور کے کل یا
جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو
بھی وہی جملہ منکورہ با اختیارات حاصل ہوں گے۔ اور اس کا ساختہ پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو
خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا یا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند
ہوں گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Hasham Abbas Muhammadzai
Advocate
0334-9067732

کے لیے منظور ہوا۔

Attested & Accepted

bilalahmad78@gmail.com

Bar Council No. bc-11-1062

Mobile No: 0300-9020098

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Before KP Service Tribunal,
Peshawar.

Appeal 1992/2023

AMEER NAWAZ ... v/s - Govt. of KP.

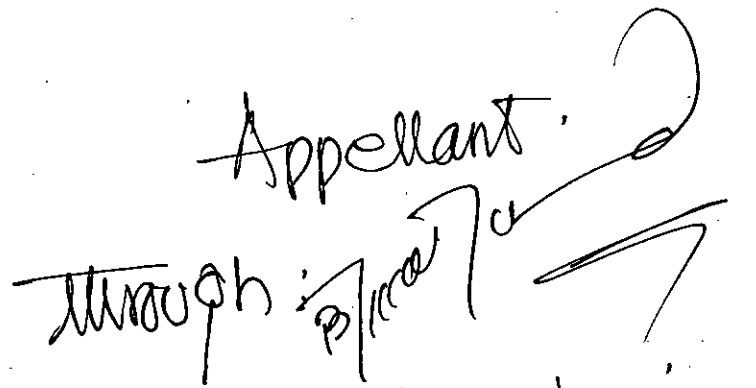
APPLICATION FOR ENLISTING
AND PROCEEDING ^{THE} TITLED
CASE BEFORE PRINCIPAL SEAT
AT PESHAWAR.

Respectfully Sheweth,

1. That, titled Service Appeal is filed today, in which no date ^{yet} has been fixed.
2. That, the disputed Seniority List of Matriculate Class-IV Employees has been issued from Peshawar in which the names & particulars of Class-IV staff from whole province have been mentioned.

3. That, amongst 3 respondents, two are stationed at Peshawar hence enlistment of proceedings of titled Appeal requires fixation before Principal Seat.

It is, therefore, requested that titled case be enlisted at Peshawar.

Appellant.
through: 
Bilal-A-Kakarizai
ASC, Peshawar.