

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION PETITION NO. 712 /2023

IN SERVICE APPEAL NO. 1227/2020

Aziz UllahPetitioner

VERSUS

Chief Secretary Khyber Pakhtunkhwa & others.....**Respondents.**

INDEX

Sr. No.	Description of Documents	Annex	Pages
1.	Para-wise Comments		2-4
2.	Affidavit		5
3.	Authority letter		6
4.	CPC 12(2) Petition No. 642/2022	I	7-23
5.	Surplus Pool Policy	II	24-28


 Section Officer (Litigation)
 Government of KP
 Establishment Department

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

EXECUTION PETITION NO. 712/2023

IN SERVICE APPEAL NO. 1227/2020

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 10/68

Dated 2-1-24

Aziz Ullah,Appellant

VERSUS

Chief Secretary Khyber Pakhtunkhwa & others **Respondents**

PARAWISE COMMENTS/REPLY ON BEHALF OF RESPONDENTS NO. 1, 2 & 3

RESPECTFULLY SHEWETH,

Preliminary Objections:

1. That 12(2) CPC petition No. 642/2022 Muhammad Sadiq & 1041 others has been filed by 1042 employees of Establishment Department against the adjustment of Mr. Hanif-ur-Rehman on the basis of fraud & misrepresentation from the Hon'ble Service Tribunal in Service Appeal No.1227/2020 for setting aside the Judgment/ order dated 14.01.2022, which is still pending adjudication before the Hon'ble Tribunal (**Annex-I**).
2. That the Appellant was not a party in the Service Appeal No. 1227/2020 and has different grounds/merit and grievances, therefore, cannot claim execution of the order/judgment of the Hon'ble Service Tribunal, KP in the instant case, hence this appeal may be dismissed in limini.
3. That the Appellant has got no cause of action to institute the instant Execution Petition.
4. That the Appellant has not come to this Hon'ble Court with clean hands.
5. That the appeal is not maintainable in the present form.
6. That the Appellant is estopped by his own conduct to file the instant Execution Petition.
7. That the Execution Petition has been filed with mala fide intention.

FACTS & GROUNDS:

1. Pertains to record
2. **Incorrect**, employees of FATA Secretariat were placed in the surplus pool for their expeditious adjustment in consequence to the 25th amendment in the constitution of Pakistan for merger of FATA with Khyber Pakhtunkhwa. As a result of the merger of FATA, its secretariat became redundant and so did its employees as the province of Khyber Pakhtunkhwa already had a dedicated Secretariat consisting of a sizable number of employees with terms and conditions different than that of employees of erstwhile FATA Secretariat.


- 3. Pertains to record.
- 4. **Correct**, the petitioners were adjusted in accordance with the existing Provincial Surplus Pool Policy, 2001 (**Annex-II**) and its legislative intent.
- 5. **Correct** to the extent that the said appeal had been filed and the appellants have been adjusted in the secretariat in light of its judgement, however, 1042 employees of Establishment Department have filed 12(2) CPC petition No. 642/2022 Muhammad Sadiq & 1041 others against the adjustment of Mr. Hanif-ur-Rehman on the basis of fraud & mis-representation from the Hon'ble Service Tribunal in Service Appeal No.1227/2020 for setting aside the Judgment/ order dated 14.01.2022 (**Annex-I**). The appeal under 12(2) CPC has yet to be decided.
- 6. **Correct**, however, as every case has its own merits/ grounds and the petitioner was not a party in the Service Appeal No.1227/2020, therefore, he cannot claim the benefit of the Order/Judgement of the Hon'ble Service Tribunal, Khyber Pakhtunkhwa, without having legal deliberations on the matter. Moreover, as the instant petitioner was not a party in the Service Appeal No.1227/2020, which had its own merits/grounds therefore, he cannot claim the execution of the order/judgment in the said service as it is not applicable to the appellant. Reliance is placed on the judgment of apex court in 2010 PLC (C.S) 924(b) which held that **"every case is to be decided on its own peculiar circumstances and fact"**. Besides, it is not the right of the appellants/petitioners to ask for absorption in Establishment Department. The Establishment Department has its own employees and the appellant is trying backdoor entry in Establishment Department which may violate rights of thousands of employees of Establishment Department which may lead to litigation against the department by its own employees. Moreover, it can also open a Pandora box for Establishment Department by paving the way for illegal absorption of 4000 project employees of Departments of ex-FATA Secretariat in the Establishment Department and would also increase the burden of unnecessary litigation for the Hon'ble Service Tribunal.
- 7. **Correct**
- 8. **Correct**
- 9. As already explained in detail in Para-6 above.
- 10. Irrelevant to cite in this particular case.
- 11. **Correct**, however, the petitioner was not a party in the Service Appeal No. 1227/2020 and he has different grounds/merits and grievances, therefore, cannot claim execution of the order/judgment of the Hon'ble Service Tribunal, Khyber Pakhtunkhwa in the instant case.
- 12. **Correct** to the extent that the petitioners had approached to the Establishment and Administration Department for implementation of the Order/Judgment of the Service Tribunal, Khyber Pakhtunkhwa announced in service appeal No.


1227/2020, dated 14.01.2022. The present petitioners had no relevancy with above mentioned Order/Judgment of the Service Tribunal, Khyber Pakhtunkhwa, even though the representation/request of the present petitioner had been thoroughly examined at Establishment Department and keeping in view of all facts/findings, the Competent Authority i.e. Chief Secretary, Khyber Pakhtunkhwa regretted the request of the petitioner purely on merit, being not relevant, baseless and not implementable in light of the Order / Judgment of the Service Tribunal, Khyber Pakhtunkhwa.

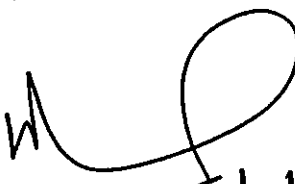
13.No Comments

Prayer:

In view of the above submissions, it is humbly prayed that the instant service appeal is not maintainable and devoid of any merit, therefore, may graciously be dismissed in limini with cost.


for **(NADEEM ASLAM CHAUDHARY)**
Chief Secretary,
KHYBER PAKHTUNKHWA
(Respondent No. 01)


for **(SHAHIDULLAH)**
Secretary,
ESTABLISHMENT DEPARTMENT,
(Respondent No. 02)


(AMER SULTAN HAREEM)
Secretary,
Finance Department,
(Respondent No. 03)

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION PETITION NO. 712 /2023

IN SERVICE APPEAL NO. 1227/2020

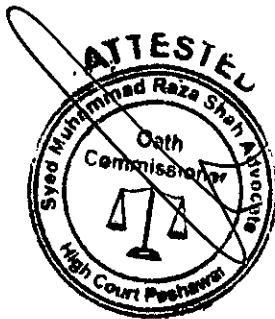
Aziz UllahAppellant

VERSUS

Chief Secretary Khyber Pakhtunkhwa & others.....**Respondents.**

AFFIDAVIT

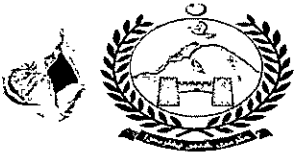
I, Mr. Shahid Ullah, Secretary Establishment Department (BS-20), respondent, do hereby solemnly declare that contents of the Reply in the Execution Petition are correct to the best of my knowledge and record and nothing has been concealed from this Hon'ble Tribunal. It is further stated on oath that in this Execution Petition, the answering Respondent has neither been placed ex-parte nor their defense/struck up.



f DEPONENT


CNIC No. 11101-1464320-1
Contact No. 0333,9744944

02 JAN 2024



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT


6


AUTHORITY LETTER

Mr. Khaliq Ur Rehman, Superintendent (BPS-17), Litigation-II Section, Judicial Wing, Establishment Department, is hereby authorized to submit Reply, in the Hon'able Services Tribunal, in Execution Petition No. 712/2023 in S.A No. 1227/2020 Titled "Aziz Ullah VS Govt. of Khyber Pakhtunkhwa & Others" on behalf of the undersigned.

for

**CHIEF SECRETARY,
KHYBER PAKHTUNKHWA,
(Respondent No. 01)**

for

**SECRETARY,
ESTABLISHMENT DEPARTMENT,
(Respondent No. 02)**


**SECRETARY,
FINANCE DEPARTMENT,
(Respondent No. 03)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

12(2) CPC Petition NO. 642/2022

- 1. Muhammad Sadiq s/o: Kiramat Shah E & Ad deptt Assistant
- 2. Latif Ur Rahman s/o: Atiq ur Rahman CM Sectt
- 3. Asim Ali s/o: Asghar Ali Khan Higher education deptt All are Assistants 1-to-4
- 4. Said Shah s/o: Said Badshah Social welfare deptt Assistants
- 5. Nafees Ahmad s/o: Ghulam Hafeez Finance deptt
- 6. Shakeel Hussain s/o: Abdur Rasheed Finance deptt
- 7. Abdul Wali Khan s/o: Muslim Khan excise and taxation deptt
- 8. Mohib Ullah Khan s/o: Naqib Ullah governor Sectt
- 9. Saifullah s/o: Abdul Dayan Finance deptt all are Assistants
- 10. Ali Asghar s/o: Karam Dad Agriculture deptt
- 11. Salahud Din s/o: Sar Gul Muham Senior Clerk PHE Dept Peshawar
- 12. Muhammad Zamir s/o: Mozafar Gul E & AD deptt Assistant
- 13. Muhammad Awais Sami Senior Clerk Health Dept Peshawar
- 14. Muhammad Sheraz ud din Home deptt Junior Clerk
- 15. Zaheen ullah s/o: Saif Ullah E & AD deptt Assistants
- 16. Sultane Romo s/o: Zarullah E & AD deptt
- 17. Arif Shah s/o: Sadiq Shah Kp- culture and Tourism deptt
- 18. Fryaz Muhammad s/o: Rnshan Khan sports deptt
- 19. Noorul Amin s/o: Gul Khan Transport deptt
- 20. Adnan Quraishi E & Ad deptt
- 21. Aftab Ahmad s/o: Shah Alam ST & IT deptt
- 22. Abdul Hanan s/o: Alam Shah Senior Clerk Social Welfare Dept Peshawar
- 23. Muhammad Tariq Khan s/o: Mir Alam Jan Finance deptt
- 24. Muhammad Farooq s/o: Muhammad Anwar Governor Sectt All are Assistants
- 25. Khan Muhammad s/o: Yar Muhammad Senior Clerk Food Dept Peshawar
- 26. Nadeem Khan s/o: Muhammad Maroof Tinoli IPC deptt
- 27. Muhammad Fahad Iqbal s/o: Muhammad Iqbal Awan PHE deptt
- 28. Fahim ur Rahman s/o: Latif Ur Rahman Mineral deptt
- 29. Abbas aziz s/o: Aziz ur Rahman LGE & RD deptt
- 30. Muhammad Imran Khan s/o: Jehanzalib Khan E & Ad Deptt
- 31. Hammad Ahmad s/o: Shabir Ahmad Finance deptt
- 32. Muhammad Ikram s/o: Jehnazalib PMRU on deputation basis
- 33. Muhammad Tahir s/o: Fazal Raziq Finance deptt
- 34. Abdul Hal s/o: Khan Sher P & D deptt
- 35. Muhammad Asif s/o: Muhammad Shah E & AD deptt
- 36. Abdul Majid s/o: Ejaji Ahmad Khan C & W deptt
- 37. Usama Salman s/o: Intezar Balcht E & Ad deptt
- 38. Muhammad Iqbal s/o: Ghulam Muhammad Environment deptt
- 39. Zulfiqar Ahmad s/o: Raees Khan KP- PSRA
- 40. Luqman Saeed s/o: Fazle Saeed CM Sectt
- 41. Mehmood Saleem s/o: Qasim Khan Finance deptt
- 42. Muhammad Abbas Khan s/o: Amin Khan C & W deptt
- 43. Bashir Khan s/o: Muhammad Yar E & SE deptt
- 44. Sami Ullah Khan s/o: Ajmal Khan Home deptt
- 45. Ali Abbas Khan Marwat s/o: Mir Abbas Khan Marwat Finance deptt
- 46. Tahir Khan s/o: Rashid Khan Relief deptt
- 47. Muhammad Rahim s/o: Fazle Rahman E & Ad deptt
- 48. Muhammad Azam s/o: Muhammad Ayoob E & Ad deptt All are Assistants
- 49. Janbaz Ahmad s/o: Mustajab Khan Senior Clerk Social PMS service Dept Peshawar
- 50. Muhammad Tariq Rashid s/o: Abdul Rashid Senior Clerk Ghilliyat Development Authority Dept Abbottabad
- 51. Yahya Ullah s/o: Rahmat Dool E & AD deptt
- 52. Muhammad Naveed s/o: Khan Afsar STI- E & AD deptt
- 53. Tahir Javed s/o: Asghar Javed Agriculture deptt
- 54. Nafeeb Ullah s/o: shams ul Qamar Baig P & D deptt
- 55. Owais Khan s/o: Habib ur Rahman Finance deptt
- 56. Sajjad Muhammad Khan s/o: Muhammad Khan Finance deptt
- 57. Naveed Hussain s/o: Ghulam Husn Senior Clerk in PMS Peshawar
- 58. Zulfiqar Wali Khan s/o: Wali zar Khan Wali Law deptt
- 59. Zubair Shah s/o: Mirchinjan E&AD deptt
- 60. Sayyed Fawad Rashid s/o: Sayyed Haroon Rashid Law deptt
- 61. Mr Ikram Ullah s/o: Haji Saad Ullah E & AD deptt
- 62. Muhammad Shafiq s/o: Gul Rasool Finance deptt All are Assistants
- 63. Tina Marry d/o: Akram Nadeem E & Ad deptt
- 64. Tehseen ullah s/o: Saad ullah Senior Clerk E&AD Dept Peshawar
- 65. Niaz muhammad s/o: Wazir Muhammad C & W deptt
- 66. Muhammad Shoab Afridi s/o: Muhammad Yar Muhammad Industries deptt
- 67. Maroof Khan s/o: Fazal Nabi E & AD deptt
- 68. Qazi Muhammad Khalid s/o: Qazi Muhammad Farooq Housing deptt
- 69. Muhammad Abubakar s/o: Muhammad Ajmal Khan Health deptt
- 70. Amjid Ali s/o: Jangl Khan Excise and taxation deptt
- 71. Zahid Khan s/o: Abdul Akbar LGE & RD deptt
- 72. Islam Sher s/o: Hassan Sher E & SE deptt

Section Officer (Litigation)
Government of KP,
Establishment Department

73. Usman Wali-Khan s/o: Mns Wali Khan Directorate of sports
 74. Muhammad Ibrahim s/o: Hazrat Shah E & SE deptt
 75. Saleem ullah Khan s/o: Mir Alam Khan Agriculture deptt
 76. Muhammad Awais s/o: Abdul Aziz Administration deptt
 77. Muhammad Sadique s/o: Inayat Ullah Governor Sectt
 78. Khan Muhammad s/o: Mughal Khan Transport section *All are Assistants*
 79. Sajid Ali Shah Senior Clerk Finance Dept Peshawar Senior Clerk Finance Dept Peshawar
 80. Zaffar Khan Senior Clerk Agriculture Dept Peshawar
 81. Muhammad Javed s/o: Khuda Bakhsh Senior Clerk Finance Dept Peshawar
 82. Mr Shidi Khan s/o: Muhammad Humayoon Senior Clerk Information Dept Peshawar
 83. Haidar Ali Senior Clerk Social Welfare Dept Peshawar
 84. Yousaf Khan s/o: Momin Khan Senior Clerk Industries Dept Peshawar
 85. Zain Khan Senior Clerk E&SE Dept Peshawar
 86. Bahar ullah Senior Clerk E&SE Dept Peshawar
 87. Rahmat ullah Senior Clerk Higher Education Dept Peshawar
 88. Abid Munir Senior Clerk Irrigation Dept Peshawar
 89. Hidayat Ullah s/o: sahib Ullah Senior Clerk Finance Dept Peshawar
 90. Saifdar Jamil Senior Clerk Excise & taxation Dept Peshawar
 91. Wahab Ali Senior Clerk IPC Dept Peshawar
 92. Rahmat Ullah Senior Clerk Sports Dept Peshawar
 93. Shaidi Ghulam Senior Clerk PHE Dept Peshawar
 94. Rizaz Muhammad s/o: Zair Muhammad Senior Clerk Finance Dept Peshawar
 95. Gul Zain Senior Clerk Social Welfare Dept Peshawar
 96. Jan Niaz Senior Clerk E&AD Dept Peshawar
 97. Sinaidr Ali Shah s/o: Aurangzab Shah Senior Clerk P&D Dept Peshawar
 98. Murtaza Ahmad s/o: Muhammad Shoaib Home deptt
 99. Qismat Ali Khan Senior Clerk E&SE Dept Peshawar
 100. Mehmi Abbas Senior Clerk Finance Dept Peshawar
 101. Humayoon Khan Senior Clerk P&D Dept Peshawar
 102. Tajuddin Senior Clerk P&D Dept Peshawar
 103. Qasim Mehmood Senior Clerk Mineral Dept Peshawar
 104. Mehmood Ali Khan s/o: Qalandar Khan Senior Clerk Labour Dept Peshawar
 105. Musawir Shah Senior Clerk Governor House Dept Peshawar
 106. Yousaf Ali Shah Senior Clerk Governor Secretariat Dept Peshawar
 107. Rashid Ali Senior Clerk Local Govt Dept Peshawar
 108. Muhammad Ali s/o: Liaqat Ali Senior Clerk Home Dept Peshawar
 109. Muhammad Jamil s/o: Bazurg Shah Senior Clerk Health Dept Peshawar
 110. Noman zain s/o: Aurangzab Senior Clerk Industries Dept Peshawar
 111. Sait Khan s/o: Dilshad Khan Senior Clerk E&AD Dept Peshawar
 112. Dawood Afzal s/o: Tajul Haq Senior Clerk PHE Dept Peshawar
 113. Lazim Shah s/o: qadeem Shah Senior Clerk Irrigation Dept Peshawar
 114. Zahir Abbas s/o: tajul Haq Senior Clerk Finance Dept Peshawar
 115. Sana Ullah s/o: Shams ur Rahman Senior Clerk P&D Dept Peshawar
 116. Qambar Shah s/o: Muhammad Shoaib Khan Senior Clerk Finance Dept Peshawar
 117. Sajid Ahmad s/o: Fozle Malik Senior Clerk Finance Dept Peshawar
 118. Muhammad Abbas s/o: Sher Azam Khan Senior Clerk P&D Dept Peshawar
 119. Amjid Ali s/o: Muhammad Ali Senior Clerk CM Secretariat Dept Peshawar
 120. Shaif Ullah s/o: Aman Ullah Senior Clerk Finance Dept Peshawar
 121. Zahoor ud din s/o: Abdul Ghafoor Senior Clerk E&AD Dept Peshawar
 122. Insan ullah s/o: Muhammad Zahir Senior Clerk IPC Dept Peshawar
 123. Sultan younsa s/o: Gul Muhammad Senior Clerk E&SE Dept Peshawar
 124. Nasir Khan s/o: Wasal Khan Senior Clerk E&AD Dept Peshawar
 125. Abdul Basit s/o: Pervaz Khan Senior Clerk E&AD Dept Peshawar
 126. Hidayat Ullah Khan s/o: Dost Muhammad Khan Senior Clerk Finance Dept Peshawar
 127. Abdul Qadir Senior Clerk PHE Dept Peshawar
 128. Zarmash Khan s/o: Wasil Khan Senior Clerk E&AD Dept Peshawar
 129. Nasrat Khan s/o: Mirza Khan Senior Clerk Governor House Dept Peshawar
 130. Sarzamin s/o: Gul Dad Senior Clerk E&SE Dept Peshawar
 131. Imdad Khan s/o: Zahir Ullah Senior Clerk C&W Dept Peshawar
 132. Shakil Khan s/o: Masam Khan Senior Clerk ST&IT Dept Peshawar
 133. Kher ul Amin s/o: Muhammad Rana Senior Clerk Finance Dept Peshawar
 134. Muhammad Tahir s/o: Liaqat Hussain Senior Clerk E&AD Dept Peshawar
 135. Rool Ullah s/o: Zahir Ullah Khan Senior Clerk Finance Dept Peshawar
 136. Nasir Ahmad s/o: Muhammad Nazir Senior Clerk Health Dept Peshawar
 137. Yousaf Ali s/o: Alam Sher Senior Clerk C&W Dept Peshawar
 138. Muhammad Azam s/o: Muhammad Sarfaraz Khan Senior Clerk Energy & Power Dept Peshawar
 139. Aqlb Khan Senior Clerk Mineral Dept Peshawar
 140. Yousaf Khan s/o: Khalid Khan Senior Clerk E&AD Dept Peshawar
 141. Fazal Hussain s/o: Umar Muhammad Senior Clerk Agriculture Dept Peshawar
 142. Gharib Nawaz Senior Clerk CM Sect Dept Peshawar
 143. Ramdad Ali Senior Clerk E&AD Dept Peshawar
 144. Arshid Habib Senior Clerk Home Dept Peshawar
 145. Raiz Balg s/o: Azam Balg Senior Clerk C&W Dept Peshawar
 146. Abdul Qayoom Senior Clerk Higher Education Dept Peshawar
 147. Zeeshan Ali Shah s/o: Moshraf Shah Senior Clerk Auqaf Dept Peshawar
 148. Ghulam Haider Senior Clerk Environment Dept Peshawar
 149. Fazal Haleem Senior Clerk E&AD Dept Peshawar
 150. Nadeem Khan s/o: Rahim Gul Senior Clerk Mineral Dept Peshawar
 151. Kamran Khan Senior Clerk Irrigation Dept Peshawar
 152. Bilal Khan s/o: Nasir Khan E & AD deptt
 153. Muzamil Hussain Senior Clerk E&AD Dept Peshawar
 154. Kifayat Ullah Senior Clerk Governor Sect Dept Peshawar
 155. Ibrar Hussain Senior Clerk Finance Dept Peshawar

nk
 Section Officer (Litigation)
 Government of KP
 Establishment Department

156. Muhammad Salim Senior Clerk Finance Dept Peshawar
 157. Muhammad Sarfaraz Ali Senior Clerk Local Govt Dept Peshawar
 158. Rashid Minhas Senior Clerk E&SE Dept Peshawar
 159. Javed Khan Senior Clerk PHE Dept Peshawar
 160. Bacha Naeem s/o: Muhammad Nazir E & Ad deptt Junior Clerk
 161. Aslam Khans/o: Wazir Khan Finance deptt " " J.C
 162. Sajid Saeed s/o: Abdul Saeed Senior Clerk E&AD Dept Peshawar " " J.C
 163. Kalsoom Bibi Senior Clerk P&D Dept Peshawar " " J.C
 164. Syed Muzaffar Shahs/o: Syed Lal Bndshah Senior Clerk Governor Sect Dept Peshawar
 165. Asad Farooq s/o: Umar Farooq Senior Clerk PHE Dept Peshawar
 166. Miss Sadia d/o: Amir Bahadar Senior Clerk Governor Sect Dept Peshawar
 167. Falak Niaz s/o: Muhammad Arshad Senior Clerk Law Dept Peshawar
 168. Uzair Gul s/o: Shama qd Din Senior Clerk PHE Dept Peshawar
 169. Muhammad Dawood Jan s/o: Muhammad Iqbal Senior Clerk E&AD Dept Peshawar
 170. Muhammad Adnanzalib s/o: Jehanzalib Khan Senior Clerk E&SE Dept Peshawar
 171. Shams ul Islam s/o: Safarish Khan Senior Clerk C&W Dept Peshawar
 172. Jawad Khan s/o: Naib Khan Senior Clerk Finance Dept Peshawar
 173. Taqdees Tahiro d/o: Falzan Hussain Junior Clerk
 174. Hazrat Bilal s/o: Musharruf Khan Senior Clerk Finance Dept Peshawar
 175. Zahid Hassan s/o: Muhammad Hassan Senior Clerk E&AD Dept Peshawar
 176. Fawad Hussain s/o: Faryad Hussain Senior Clerk Finance Dept Peshawar
 177. Abbas Khattak s/o: Muhammad Majeed Senior Clerk C&W Dept Peshawar
 178. Umair Khan s/o: Shakir Ullah Senior Clerk Information Dept Peshawar
 179. Muhammad Hamza s/o: Muhammad Mukhtiar Senior Clerk E&AD Dept Peshawar
 180. Muhammad Sohail s/o: Bostan Khan Senior Clerk Finance Dept Peshawar
 181. Summiya Imtiaz d/o: Muhammad Imtiaz Senior Clerk PMRU Dept Peshawar
 182. Hmaza Zahir Shah s/o: Zahir Shah Senior Clerk Finance Dept Peshawar
 183. Muhammad Naqash s/o: Muhammad Roshah Senior Clerk E&AD Dept Peshawar
 184. Muhammad Mumtaz Quralshi s/o: Muhammad Nawar Kha Quralshi Senior Clerk E&AD Dept Peshawar
 185. Saeed Lateef s/o: Abdul Lateef Senior Clerk ASR Dept Peshawar
 186. Saeed Anwar s/o: Anwar Khan Senior Clerk E&AD Dept Peshawar
 187. Baidar Ahmad Senior Clerk IPC Dept Peshawar
 188. Shah Nawaz Khan s/o: Amir Nawaz E & AD deptt Junior Clerk
 189. Fazil Dayan Senior Clerk C&W Dept Peshawar
 190. Ijaz Iqbal Senior Clerk Law Dept Peshawar
 191. Imran Khan Senior Clerk Environment Dept Peshawar
 192. Zorshad s/o: Irshad Khan Senior Clerk sports Dept Peshawar
 193. Muhammad Abbas s/o: Muhammad Shoaib Senior Clerk energy & power Dept Peshawar
 194. Melmoood ul Hassan Senior Clerk Agriculture Dept Peshawar
 195. Mohibullah s/o: Habibullah Senior Clerk PHE Dept Peshawar
 196. Azhar Iqbal s/o: Iqbal Ahmad Senior Clerk E&AD Dept Peshawar
 197. Farhan Manzoor Senior Clerk Law Dept Peshawar
 198. Sadar Nawaz Khan s/o: Muhammad Nawaz Senior Clerk Finance Dept Peshawar
 199. Saifullah Senior Clerk Finance Dept Peshawar
 200. Muhammad Ayaz Senior Clerk C&W Dept Peshawar
 201. Wasebullah s/o: Fazal Karim Senior Clerk KPSRA Dept Peshawar
 202. Naseebullah Khan Senior Clerk S&IT Dept Peshawar
 203. Wajahatullah s/o: Rafiqatullah Senior Clerk HOUSING Dept Peshawar
 204. Muhammad Ramceez s/o: Muhammad Saddiq Senior Clerk E&AD Dept Peshawar
 205. Iltam Ullah s/o: Jan Gul Senior Clerk E&AD Dept Peshawar
 206. Abubakar Sadiq s/o: Muhammad Naeem Senior Clerk E&AD Dept Peshawar
 207. Muhammad Fahad Awan s/o: Muhammad Farid Senior Clerk Relief Dept Peshawar
 208. Tayyab Gul s/o: Musharaf Gul Senior Clerk E&SE Dept Peshawar
 209. Muhammad Umer s/o: Zar Gul Senior Clerk state office Dept Peshawar
 210. Junaid Asif s/o: Muhammad Asif Senior Clerk C&W Dept Peshawar
 211. Hamad Alim s/o: Alamgir Senior Clerk CM sectt Dept Peshawar
 212. Ibrar Hussain s/o: Muhammad Ishaq Senior Clerk population welfare Dept Peshawar
 213. Waseem Khan s/o: Abdur Rauf Senior Clerk E&AD Dept Peshawar
 214. Muhammad Farhan s/o: raza Khan Senior Clerk Finance Dept Peshawar
 215. Saad Ali Shah s/o: Sayyed Zulfiqar Ali Shah Senior Clerk PHE Dept Peshawar
 216. Riaz Ahmad Senior Clerk HIGHER EDUCATION Dept Peshawar
 217. Sayeed Snamin Shah s/o: sayyed Iraq Shah Senior Clerk HEALTH Dept Peshawar
 218. Luqman Shah Senior Clerk CM SECTT Dept Peshawar
 219. Wali Jan Senior Clerk AGRICULTURE Dept Peshawar
 220. Rohmat Sher s/o: Zaman Sher Local govt deptt Junior Clerk
 221. Atif Amin s/o: Saleem ur Rahmnn Housing deptt Junior Clerk
 222. Saïd Amin Senior Clerk IRRIGATION Dept Peshawar
 223. Bashir Hussain Senior Clerk E&AD Dept Peshawar
 224. Shamsiand Khan Senior Clerk FinaExclse and taxation Dept Peshawar
 225. Haider Zaman Senior Clerk local govt Dept Peshawar
 226. Ameer Zada Junaid Muhammad Khan Durani Senior Clerk Home Dept Peshawar
 227. Waheed Ullah s/o: Banat Khan Mineral Dev deptt Junior Clerk
 228. Muhammad Amir Senior Clerk Finance Dept Peshawar
 229. Siltandar Khan s/o: Wakil Khan Senior Clerk E&SE Dept Peshawar
 230. Hidayat ullah s/o: Aziz Ullah IPC deptt
 231. Malik Faizan Nabl s/o: Malik Ghulam Nabl Senior Clerk CM Sect Dept Peshawar
 232. Asif Nazir s/o: Ralz Gul Senior Clerk Health Dept Peshawar
 233. Akhtar Naveed s/o: Arshid Naveed Senior Clerk CM Sect Dept Peshawar
 234. Iltam Ullah s/o: Murad Khan Senior Clerk E&AD Dept Peshawar
 235. Amjid Hussain s/o: Hussain Gul Senior Clerk Home Dept Peshawar
 236. Abid Ali s/o: Amjid Ali governor House Junior Clerk
 237. Faizan Raza s/o: Imdad Hussain Industries deptt " "

Section Office (Litigation)
 Government of KP
 Establishment Department

- 10
238. Qayoom Khan s/o: Taus Khan Energy & Power deptt
239. Muhammad Junaid s/o: Aman Ullah Khan Information deptt
240. Abdus Snmi s/o: Fazle Qadeem Khan Labour deptt
241. Yasin Khan s/o: Aurangzaib Law deptt
242. Ata Ullah s/o: Noor Muhammad Local govt deptt
243. Obaid Khan s/o: Bashir Khan Finance deptt
244. Fnyaz Ahmad s/o: Nasir Muhammad Law deptt
245. Snyyed Waqas Ali Shah s/o: Snyyed Zulfiqar Ali Shah CM Sectt
246. Malik Adnan Khan s/o: Tila Muhammad CM Sectt
247. Muhammad Aakif s/o: Muhammad Shah P & D deptt
248. Naveed Khan s/o: Sher Zada P & D Deptt
249. Muhammad Kashif Khan s/o: Muhammad Aurangzaib Finance deptt
250. Muhammad Shahab s/o: Raees Khan E & Ad deptt
251. Muhammad Afzal s/o: Niaz Ali KP-PSRA
252. Muhammad Arif s/o: Ali Halder Local Govt
253. Anwar Ali Shah s/o: Shad Muhammad Local govt
254. Kamal Khan s/o: Zahir ur Rahman Higher education deptt
255. Amir Sohail s/o: Fazle Qadir Energy & Power deptt
256. Muhammad Jawad s/o: Sobat Khan P & D deptt
257. Sayyed Muhammad Bilal s/o: Muhammad Saleem Finance deptt
258. Inaam ullah Khan s/o: Aman Ullah Khan PDMA
259. Jawad Ali s/o: Fzail Rahim CM Sectt
260. Rafiq Ullah s/o: Muhammad Ullah Finance deptt
261. Walid Ahmad s/o: Nazir Ahmad Energy & Power deptt
262. Sayyed Umar Saeed s/o: Sayyed Shaheen Shah Social welfare deptt
263. Zahid Ullah s/o: Abdul Mannan P & D deptt
264. Hassan Rahman s/o: Gul Sher, E & AD deptt
265. Gul Nawaz Khan Durani s/o: Tasleem Khan Durani P & D deptt
266. Muhammad Sheraz s/o: Muhammad Shafiq E & AD deptt
267. Shokat Ali Khan s/o: Mirza Ali Khan E & SE deptt
268. Rahmat ud Din s/o: Abdul Haq E & AD deptt
269. Asad Ullah s/o: Waheed Shah KP-PSRA
270. Sayyed Shoab Ullah Shah s/o: Snyyed Masoom Shah Finance deptt
271. Rizwan Ullah s/o: Muhammad Ishaq Auqaf deptt
272. Safer Ullah Quraishi s/o: Snmi Ullah Quraishi Finance deptt
273. Muhammad Naeem s/o: Samand Khan E & SE deptt
274. Ali Ahmad s/o: Afzal Aman IPC Deptt
275. Arif Ullah s/o: Jan Muhammad Relief deptt
276. Anees Ahmad s/o: Mulla Muhammad Mineral Dev deptt
277. Muhammad Shabir s/o: Qaisar Khan PSA
278. Muhammad Younas s/o: Jumabad Finance deptt
279. Noor Rahman s/o: Rustom Jan Relief deptt
280. Yasir Farid s/o: Farid Ullah Energy & power deptt
281. Vikash s/o: Omparkash Local deptt
282. Imran Ullah s/o: Faiz Ullah CM Sectt
283. Khaliq ur Rahman s/o: Muhammad Ismail Finance deptt
284. Saqlb Ali s/o: Sadiq Ali CM Sectt
285. Amjid Hussain s/o: Mirza Hussain E & AD deptt
286. Fazle Mola s/o: Umarzada E & AD deptt
287. Muhammad Ibrahim s/o: Fazal ur Rahman Social welfare deptt
288. Maqsood ur Rahman s/o: Fazal ur Rahman E & Ad deptt
289. Abdul Malik s/o: Ameer Khan CM Sectt
290. Muhammad Toqir Nasir s/o: Muhammad Fazil P & D deptt
291. Shafiqat Ullah s/o: Fazal Hannon CM Sectt
292. Jamal Ahmad s/o: Muhammad Raiz Quraishi E & Ad deptt
293. Muhammad wasim s/o: Habib ullah CBA branch
294. Tahir Khan s/o: Awais Khan KP- PSRA
295. Sadiq ullah s/o: Shaldr Ullah E & AD deptt
296. Bismillah Jan s/o: Haji Waris Environment deptt
297. Kamran ullah s/o: Habib ullah PMRU deptt
298. Irshad Ali Shah s/o: Ahmad Ali Shah Health deptt
299. Mohib ullah s/o: Kabir Khan Population welfare deptt
300. Alshn Khas s/o: Arshid Iqbal C&W deptt
301. Ismail Khan s/o: Khalista Jan PSRA
302. Abdussattar Khan s/o: Ahmad Gul Khan Finance deptt
303. Hamid ullah s/o: Bakhtai Gul CM Sectt
304. Umar Rahman s/o: Khalista Rahimn Finance deptt
305. Ijaz Ahmad s/o: Gul Shahzada PSRA
306. Muhammad Harris s/o: Abdul Rauf Irrigation deptt
307. Ishaq Ahmad s/o: Rahmat Khan Governor Sectt
308. Muhammad Qnsim Khan s/o: Muhammad Salim Finance deptt
309. Tehseen Javid s/o: Ghulam Muhammad STJ- E & AD deptt
310. Muhammad Farooq Khan s/o: Karim Khan Labour deptt
311. Faizan Nazar s/o: Nazar Muhammad Finance deptt
312. Muhammad Arshad Khan s/o: Salim Khan P & D deptt
313. Adnan Adil s/o: Mushtaq Ali IPC deptt
314. Majid Iqbal s/o: Nosherrwan R-I section E & AD deptt
315. Muhammad Zeeshan s/o: Jehangir Khan Housing deptt
316. Zeeshan Ahmad s/o: Muhammad Pervaiz Quraishi CM sectt
317. Wajahat ul Mujahid s/o: Mir Akbar Shah Finance deptt
318. Abdul Basir s/o: Khan Afsar Finance deptt
319. Shahzab Khan Jadoon s/o: Jehanzab Khan Housing deptt
320. Mehboob ur Rahman s/o: Khalid Khan CM sectt

Section Officer (Litigation)
Government of KP
Establishment Department

321. Aldb Javed s/o: Malik Aman E & AD deptt
 322. Waqas Jan s/o: Arshad Jan E & AD deptt
 323. Wasim ullah Khan s/o: Nasrullah Khan CM sectt
 324. Haji Akbar s/o: Hussain Akbar Information deptt
 325. Shahzad Afsar s/o: Khan Afsar Mineral deptt
 326. Awais ur Rahman s/o: Razi ur Rahman Higher education deptt
 327. Asif Ali s/o: Qaimar Ali E&AD deptt
 328. Muhammad Shoaib s/o: Muhammad Ayoob Information deptt
 329. Hazrat Ullah s/o: Bakhti Gul
 330. Niaz ur Rahman s/o: Abdul Hussain E & AD deptt
 331. Sajid Hussain s/o: Nalik Nazir Higher education deptt
 332. Muhammad Nadeem s/o: Muhammad Shabir E & AD deptt
 333. Muhammad Afzal Khan s/o: Muhammad Ismail E & AD deptt
 334. Jauas Khan s/o: Meer Hassan Shah E & AD deptt
 335. Shahzad Khan s/o: Faiz Ullah Finance deptt
 336. Mulkhtar Khan s/o: Bakhtiar Khan Finance deptt
 337. Awais Khan s/o: Ameer Nawaz E & AD deptt
 338. Roohul Amin s/o: Noshur Khan Industries deptt
 339. Afzal Hassan s/o: Muhammad Hassan CM sectt
 340. Khalid Mehmood Higher education deptt
 341. Tehseen Ali Khan s/o: Shokat Ali Mineral deptt
 342. Sayyed Akbar s/o: Akhtar Zaid E & AD deptt
 343. Muhammad Afzal Abbas s/o: Mian Faqir Gul Finance deptt
 344. Sayyed Tofiq Shah s/o: Sayyed Mubarak Shah Social welfare deptt
 345. Muqaddar Shah s/o: Maqbool Shah Higher education deptt
 346. Azaz Ahmad s/o: Riaz Ahmad PSRA
 347. Akmal Hassan s/o: Ghulam Hassan E & AD deptt
 348. Surjeet d/o: Sunil Singh ST & IT deptt
 349. Fazal Rabani s/o: Masal Khan E & AD deptt
 350. Zia ur Rahman s/o: Shukur Rahman Finance deptt
 351. Muhammad Qasim s/o: Muhammad Younas E & AD deptt
 352. Muhammad Hamid Iqbal s/o: Muhammad Iqbal Finance deptt
 353. Iqra Raees d/o: Raees Ahmad IT, HRD Wing
 354. Abdul Majid Khan s/o: Sultan Zaid P & D deptt
 355. Muhammad Tayyab s/o: Nisar Muhammad E & AD deptt
 356. Muhammad Waheed s/o: Muhammad Sneed Food deptt
 357. Abdul Baseer s/o: Abdul Hakim Sports deptt
 358. Sifat Ullah s/o: Waris Khan IPC deptt
 359. Jahangir Khan s/o: Ashraf Hussain Industries deptt
 360. Iftisham ul Haq s/o: Shahn Shah E & AD deptt
 361. Fayaz Ahmad s/o: Gul Nabi Finance deptt
 362. Naeem Shah s/o: Saif ur Shah Agriculture deptt
 363. Ahmad Saleem s/o: Muhammad Saleem E & SE deptt
 364. Rizwan Mehmood s/o: Muhammad Hanif State Office
 365. Ismail s/o: Liaqat Ali Local govt deptt
 366. Ahmad Mustafa s/o: Muhammad Nawaz Directorate of Aviation
 367. Jawad Khan s/o: Ichurshid Ali E & AD deptt
 368. Amir Khan s/o: Mehraban Shah E & AD deptt
 369. Fahad s/o: Ihsanullah Governor House
 370. Hammad Ullah Khan s/o: Najibullah Khan Social welfare deptt
 371. Kashif Ayaz s/o: Muhammad Aynz E & AD deptt
 372. Kanchal Sumair d/o: Samir Chohan Local govt
 373. Umar Zeb s/o: Muhammad Aurangzaid CM sectt
 374. Sayed Walid Ullah Shah s/o: Syed Hameed Ullah Shah E & SE deptt
 375. Haseeb Ullah s/o: Sardar Muhammad Information deptt
 376. Muhammad Bilal s/o: Muhammad Farooq finance deptt
 377. Ziyad Ahmad s/o: Ahmad Ali Governor House
 378. Zia ur Rahman s/o: Zafar Iqbal Auqaf deptt
 379. Zafar Iqbal Khanzada s/o: Khanzad Gul Home deptt
 380. Abdul Jalal s/o: Fazal Karim Mineral deptt
 381. Muhammad Luqman s/o: Hashim Khan Law deptt
 382. Muhammad Shehryar s/o: Muslim Khan CM Sectt
 383. Sohail ul Hadi s/o: Abdul Hadi E-I section
 384. Taimoor Khan s/o: Shrabat Khan Energy & power deptt
 385. Tayyab Jehangir s/o: Jehangir Ahmad Law deptt
 386. Osama Farooq s/o: Muhammad Farooq Finance deptt
 387. Muhammad Bilal s/o: Muhammad Jehangir Khan PHE deptt
 388. Zain ul Abidin s/o: Mukarram CM sectt
 389. Muhammad Farman s/o: Munsif Khan Finance deptt
 390. Dost Muhammad s/o: Bakht Baldar Mineral Dev deptt
 391. Imran Khan s/o: Muhammad Irfan Transport deptt
 392. Iqbal Hussain s/o: Muhammad Hussain E & SE deptt
 393. Muhammad Arshad Khan s/o: Hamid Khan Mineral Dev deptt
 394. Khuram Shehzad s/o: Muhammad Zamran Local govt deptt
 395. Farooq Khan s/o: Abdul Malik Finance deptt
 396. Fayaz Ahmad Khan s/o: Mian Muhammad Local govt deptt
 397. Sartaj Ali Khan s/o: Zafar Ali Khan Law deptt
 398. Imdad Ali s/o: Noor Karim E & AD deptt
 399. Saeed Ahmad s/o: Nozir Ahmad Irrigation deptt
 400. Munsif Ali s/o: Wahid Jamal Law deptt
 401. Siraj Khan s/o: Afridi Khan E & AD deptt
 402. Rehman Uddin s/o: Sano-ud Din Housing deptt
 403. Rahat Gul s/o: Khan Por Law deptt

Section Officer (Litigation)
 Government of K.P.
 Establishment Department

404. Akhtar Hussain s/o: Muntaq Khan Finance deptt
 405. Muhammad Adnan Khan s/o: Noor Afzal Finance deptt
 406. Irshad Ullah s/o: Insan Ullah Finance deptt
 407. Muhammad s/o: Saied Ullah Local govt deptt
 408. Muhammad Ibrahim s/o: Saida Jan Law deptt
 409. Imdad Ullah Governor sectt
 410. Kalimullah Jan s/o: Ali Jan CM Sectt
 411. Sallim Ghulam s/o: Ghulam Masih Law deptt
 412. Nawaz Khan s/o: Wakil Khan Energy & Power deptt
 413. Fazle Wajid s/o: Israil Khan E & AD deptt
 414. Muhammad Umair s/o: Hafiz Muhammad Salman Home deptt
 415. Ghulam Muhammad s/o: Haji Kher Muhammad Home deptt
 416. Haseeb ur Rahman s/o: Snayed Ata ur Rahman Higher education deptt
 417. Muhammad Arslad Anwar s/o: Anwar Khan E & AD deptt
 418. Arshad Khan s/o: Shamroz Khan E & AD deptt
 419. Mubshir Hassan Health deptt
 420. Roohul amin E & SE deptt
 421. Fazal Gul s/o: Samar Gul energy & power deptt
 422. Shabir Khan s/o: Rooidar Khan P&D deptt
 423. Jan Alam s/o: Sher Afzal Home deptt
 424. Abdullah Jan s/o: Naseer ul Haq Law deptt
 425. Rizwan Ahmad s/o: Bndhor Khan Local govt deptt
 426. Wasim ullah s/o: Khurshid Ali Khan Relief deptt
 427. Nawab Ali s/o: Raza Kha energy & power deptt
 428. Hassan Gul s/o Taj Gul Food deptt
 429. Sayyed Ibrahim Shah KP-PSRA
 430. Muhammad Faheem s/o: Hanif Shah afridi E & SE deptt
 431. Muhammad Ishfaq s/o: Abdur Razaq Khan Finance deptt
 432. Shah Nawaz s/o: Usman Jan Relief deptt
 433. Muhammad Mohsin Khan s/o Abdul Latife & AD deptt
 434. Muhammad Arif s/o: Roshan Khan E & AD deptt
 435. Sayyed Ayaz Hussain Shah s/o: Sayyed Imtiaz Hussain Shah Finance deptt
 436. Falz ur Rahman s/o: Abdur Rashid energy & power deptt
 437. Inayat ur Rahman s/o: Noor Ul Hadie & SE deptt
 438. Qaim Khan s/o: Zalbar Khan E & AD deptt
 439. Fazle Amin s/o: Madad Khan Higher education deptt
 440. Gul Faraz s/o: Gul baz Irrigation deptt
 441. Ajmal s/o: Mairajuddin Labour deptt
 442. Muhammad Arif s/o: Sher Zaman E & AD deptt
 443. Saif Ullah s/o: Habib ur Rahman transport deptt
 444. Muhammad Ijaz s/o: Gul Faraz-Law deptt
 445. Muhammad Ashfaq s/o: Muhammad Arif Agriculture deptt
 446. Umair Zulfiqar s/o: Zulfiqar Ahmad Transport deptt
 447. Sana ullah s/o: Saad Ullah Finance deptt
 448. Iqbal s/o: Lal Muhammad ST & IT
 449. Asif Khan s/o: Ayoob Khan E & SE deptt
 450. Kifayat ullah s/o: Naimat ullah CM Sectt
 451. Sayyed Azhar Zaidi s/o: Snayed Danish Raza Housing deptt
 452. Hazrat Ali Finance deptt
 453. Riaz Khan s/o: Darya Khan Socail welfare deptt
 454. Muhammad Imran s/o: Habib ur Rahman E & AD deptt
 455. Fida Muhammad Labour deptt
 456. Hassan Ali Environment deptt
 457. Imran Ali s/o: Nigah Hussain Agriculture deptt
 458. Umar Faraz s/o: Sarfaraz Khan Finance deptt
 459. Muhammad Irfan s/o: Mahboob ur Rahman CM sectt
 460. Zubair Ahmad s/o: syed Umar Finance deptt
 461. Shahjehan s/o: Faqir Muhammad Finance deptt
 462. Ashfaq Ahmad s/o: Khalsta Rahman STI, E & AD deptt
 463. Muhammad Ashraf s/o: Abdul Samad E & AD deptt
 464. Saleem Khan s/o: Farooq Shah Auqaf deptt
 465. Balchizada s/o: Gulzada E & AD deptt
 466. Roiman Khan s/o: Samin Jan Higher education deptt
 467. Malang Jan s/o: Nisar Ahmad Finance deptt
 468. Zakir ullah Governor Sectt
 469. Noman Ijaz s/o: Ijaz Ahmad Sports deptt
 470. Aneel Anwar s/o: Anwar Auqaf deptt
 471. Sajid Khan s/o: Naimat Ullah CM Sectt
 472. Naeem ullah s/o: Gul Hassan R-V section
 473. Muhammad Rizwan s/o: Muhammad Riaz E & SE deptt
 474. Amir Khan s/o: Gul Rahman Excise and taxation deptt
 475. Shakil Ahmad s/o: Sher Ahmad C & W deptt
 476. Sajjad Ahmad s/o: Asif Khan Irrigation deptt
 477. Sajid Khan s/o: sanab Gul Local deptt
 478. Balchbilah s/o: Hazrat Hussain Law deptt
 479. Gulam ullah s/o: Bashir Muhammad Health deptt
 480. Sedar Islam s/o: Muhammad Sultan Khan Health deptt
 481. Inaam ullah s/o Ahmad Khan Administration deptt
 482. Shah Hassan s/o: Faqir Muhammad Law deptt
 483. Naeem Abbas s/o: Qadir Bakhsh E & AD deptt
 484. Sajjad Ali s/o Noor Karim Finance deptt
 485. Asif Shabir s/o Malik Muhammad Sadiq Transport deptt
 486. Arshad Alam s/o: Alam Khan Population deptt

Section Officer (Litigation)
 Government of KP
 Establishment Department

- 487. Aziz Khan s/o: Sultan Khan PHE deptt
- 488. Fahim Khan s/o: Naseem Khan Home deptt
- 489. Amjid Hussain s/o: Mehr Muhammad energy and power deptt
- 490. Ikram Khan s/o: Alam Sher E & AD deptt
- 491. Asfand Yar Khan s/o: Mujahid Khan Sports deptt
- 492. Muhammad Rafi s/o: Muhammad Sndiq Khan Health deptt
- 493. Sherin Khan Finance deptt
- 494. Rooh ullah s/o: Inayat Ullah Excise and taxation deptt
- 495. Muhammad Tayyab Shokat s/o: Shokat Pervez E & AD deptt
- 496. Shahid Riz s/o: riz Ahmad IPC deptt
- 497. Adil Babar s/o: Saleem Javed Bahar E & AD deptt
- 498. Zarwali Kha s/o: Raj Wali Khan Finance deptt
- 499. Sifat Ullah s/o: Awal Khan E & AD deptt
- 500. Luqman Khan s/o: Mulhtiar Khan Higher education deptt
- 501. Gul Zamin Khan s/o: Gul Zarin Finance deptt
- 502. Yousaf Khan s/o: Nazar Muhammad Finance deptt
- 503. Bahadar Khan s/o: Saeed Khan P & D deptt
- 504. Imran Khan s/o: muhammad Ashraf Khan Home deptt
- 505. Nadir Khan Health deptt
- 506. Muhammad Zubair s/o: Unab PHE deptt
- 507. Jawad Tanwir s/o: Tanveer Ahmad Finance deptt
- 508. Kachkol Shah s/o: Mukamit Shah PHE deptt
- 509. Ramzan Hussain s/o: Gul Zarin PHE deptt
- 510. Abdul Shakoor s/o: Dolat Khan Finance deptt
- 511. Muhammad Sajid s/o: M. Zafar
- 512. Wahab Ali s/o: Mulhtar Ali Agriculture deptt
- 513. Muhammad Abbas Khan Higher education deptt
- 514. Shahfaisal Jan s/o: Ihsan Ullah Administration deptt
- 515. Noor Khan s/o: Gulab Sher PHE deptt
- 516. Sharafat Ali s/o: Muhammad Hanif Excise and taxation deptt
- 517. Rawalz Khan s/o: Sher amln Mineral Dev deptt
- 518. Muhammad Ihsan Jawad s/o: Fazal Dad Khan E & AD deptt
- 519. Afaq Ahmad s/o: Imtlaz Khan E & AD deptt
- 520. Faisal Zulfqar s/o Zulfqar Ahmad E & AD deptt
- 521. Llaqat Khan s/o: Sardar Khan C & W deptt
- 522. Israil Khan s/o: Ibrahim Khan Mineral deptt
- 523. Saseem Hussain s/o: Bashir Ahmad P & D deptt
- 524. Muhammad Anooz s/o: Muhammad Yasln Governor House
- 525. Ajwad Ali s/o: Mughaddas Ali (All are Junior clerks) Law deptt
- 526. Roza Amin s/o: Mira Khan Assistant E & AD Dept Peshawar
- 527. Sayyed Salamat Shah Superintendent E&SE Dept Peshawar
- 528. Lal Zahir Superintendent agriculture Dept Peshawar
- 529. Amna Khnn d/o: Abdul Rashid Khan Superintendent C&W Dept Peshawar
- 530. Jafar Khan Superintendent Home Dept Peshawar
- 531. Muhammad Imtlaz s/o: Zar Khan Superintendent Sport Dept Peshawar
- 532. Abdus Samad Khan s/o: Abdur Rahman Superintendent finance Dept Peshawar
- 533. Zeeshan Superintendent C&w Dept Peshawar
- 534. Muhammad Wajहत Superintendent E&AD Dept Peshawar
- 535. Raza Ali Bangash Superintendent Health Dept Peshawar
- 536. Muhammad Ammar Superintendent Relief Dept Peshawar
- 537. Muhammad Asad Superintendent E&AD Dept Peshawar
- 538. Furqan ud Din Superintendent E&AD Dept Peshawar
- 539. Zia ur Rahman s/o: Qazi Muhammad Nabi Superintendent Finance Dept Peshawar
- 540. Abdul Salam s/o: Muhammad Ibrahim PMS BS-17 in service quota.
- 541. Jamsied Alam Khan s/o: Muhammad Nawaz Khan
- 542. Mudassar Khan s/o: Mushtaq Ahmad Assistant Law Dept Peshawar
- 543. Abid Ahmad s/o: Muhammad Mobin Superintendent IPC Dept Peshawar
- 544. Akhtar Rasool s/o: Daud
- 545. Muhammad Hassan Shah s/o: Aftar Ali Shah PMS BS-17 in service quota
- 546. Muhammad Ilyas s/o: Muzaffar Hussain PMS BS-17 in service quota
- 547. Nizam ud Din Khan s/o: Muhammad Amin
- 548. Issa Muhammad Khan s/o: Nawab Khan PMS BS-17 in service quota
- 549. Mehtab Ali Khnn s/o: Muhammad Ashraf Khan
- 550. Muhammad Waseem Sajjad s/o: Sajjad Ali Khan
- 551. Abdul Aziz s/o: Abdul Karim PMS BS-17 in service quota
- 552. Nusrat bibi d/o: Amin Sahabi PMS BS-17 in service quota
- 553. Abrar Ali Shah s/o: Barkat Shah PMS BS-17 in service quota
- 554. Azim Ullah s/o: Taj Malook PMS BS-17 in service quota
- 555. Muneeb Ahmad s/o: Muhammad Hanif
- 556. Adil Rahim s/o: Abdur Rahim PMS BS-17 in service quota
- 557. Wasim Ullah Wazir Superintendent C&W Dept Peshawar
- 558. Imran Anwar Superintendent CM secretrait Dept Peshawar
- 559. Zeeshan Khan s/o: Badshah Khnn Superintendent Finance Dept Peshawar
- 560. Alomgir Khan Superintendent Governor Secretariat Dept Peshawar
- 561. Umar Ayyaz Superintendent Home Dept Peshawar
- 562. Ikram Ullah Superintendent Industries Dept Peshawar
- 563. Ijaz Khan Superintendent Local Govt Dept Peshawar
- 564. Fazli Aola Superintendent Aufaq Dept Peshawar
- 565. Ijaz Hussain Superintendent S&SE Dept Peshawar
- 566. Fazle Naeem Superintendent ST&IT Dept Peshawar
- 567. Jchanzeb Superintendent Agriculture Dept Peshawar
- 568. Raz Muhammad Superintendent Home Dept Peshawar
- 569. Albert David Superintendent Home Dept Peshawar

All are Junior clerks (160-10-525)

Assistant PMS BS-17

All are Assistants (544-10-556)

(Signature)
 Section Officer (Litigation)
 Government of KP
 Establishment Department

570. Iqbal Khan Superintendent Higher duction Dept Peshawar
 571. Mushtaq Khan Superintendent Excise Dept Peshawar
 572. Basharat Rasool Superintendent PHE Dept Peshawar
 573. Nawab Ali Finance Deptt *Assistant*
 574. Muhammad Iqbal s/o: Muhammad Ashiq *Assistant*
 575. Sher Azad Khan Superintendent PRMU Dept Peshawar
 576. Azam Khan Superintendent Local Govt Dept Peshawar
 577. Ghulamullah Superintendent Agriculture Dept Peshawar
 578. Imtiaz Ali s/o: Mumtaz Ali Superintendent Law Dept Peshawar
 579. Mazullah Superintendent Higher Education Dept Peshawar
 580. Jamshed Khan Superintendent Higher Education Dept Peshawar
 581. Shah Badshah Superintendent Finance Dept Peshawar
 582. Nimmat Ali Superintendent C&W Dept Peshawar
 583. Abdullah s/o: Matlur Rahman Superintendent Home Dept Peshawar
 584. Aurangzeb s/o: Khan Sahib law deptt. *Assistant*
 585. Raj wali Superintendent Housing Dept Peshawar
 586. Zaidur Hussain Superintendent Mineral Dept Peshawar
 587. Ijaz Ahmad Superintendent Excise Dept Peshawar
 588. Inaynt ur Rahman s/o: Sald Rehman Superintendent Finance Dept Peshawar Noorullah Jan s/o:
 Amir Nawaz Khan LGE & RD Deptt
 589. Saeeda Bano Superintendent E&AD Dept Peshawar
 590. Dastar Ali Superintendent C&W Dept Peshawar
 591. Saifi Ullah Superintendent Labour Dept Peshawar
 592. Raizullah Superintendent Irrigation Dept Peshawar
 593. Muhammad Iqbal s/o: Noor Muhammad Superintendent Information Dept Peshawar
 594. Noor un Nabi s/o: Sald Nabi Superintendent Finance Dept Peshawar
 595. Irfanullah s/o: Roghan Shah Superintendent Food Dept Peshawar
 596. Shuja ud Din s/o: Azim Khan Finance Deptt *Assistant*
 597. Lal Hussain Superintendent P&D Dept Peshawar
 598. Muhammad Ayyaz Khan s/o: Afridi Khan Superintendent Benevolent Fund Dept Peshawar
 599. Kashif Superintendent Health Dept Peshawar
 600. Farhanullah Superintendent E&A Dept Peshawar
 601. Kifayat Aziz Khan Superintendent CM Secretariat Dept Peshawar
 602. Muhammad Ahmad Superintendent Finance Dept Peshawar
 603. Muhammad Arshad Khan s/o: Muhammad Jamil Superintendent Home Dept Peshawar
 604. Muhammad Rafiq Khan Superintendent Finance Dept Peshawar
 605. Akhtar Gul s/o: Sher Muhammad Superintendent E&SE Dept Peshawar
 606. Abdur Rashid Superintendent Finance Dept Peshawar
 607. Muhammad Asim Siddique Superintendent Local Govt Dept Peshawar
 608. Shaikat Hussain Superintendent Finance Dept Peshawar
 609. Fazal Subhan Superintendent Home Dept Peshawar
 610. Imtiaz Ahmad s/o: Waqif Khan Superintendent Agriculture Dept Peshawar
 611. Hafiz Muhammad Khalid Superintendent Finance Dept Peshawar
 612. Ashraf Khan s/o: Amir Rahman Superintendent CM sect Dept Peshawar
 613. Syed Masood Shah Superintendent E&AD Dept Peshawar
 614. Syed Qaisar Ali Shah Superintendent Energy & Power Dept Peshawar
 615. Wasim ur Rahman Superintendent Finance Dept Peshawar
 616. Rahmanullah s/o: Hamid Home deptt
 617. Nayab Altaf d/o: Altaf Finance deptt
 618. Hamid Shah s/o: Sultan Shah E & AD Deptt
 619. Zahid Hussain s/o: Ali Muhammad Finance deptt
 620. Abdur Rahman s/o: Faki ur Rahman P & D Deptt
 621. Afzal Khan s/o: Zarghoi Shah E & SE Deptt
 622. Masaud Khan s/o: Said Afzal E & AD, HRD-I Section
 623. Muhammad Irshad Khan s/o: Muhammad Roshan P & D deptt
 624. Hamayoun Mustafa *Assistant*
 625. Mian Muhammad Tariq s/o: Muhammad Naseem Social welfare deptt
 626. Yousaf Khan s/o: Mamrez Khan Higher education deptt
 627. Muhammad Ashraf Khan s/o: Muhammad Zar Khan E & AD deptt
 628. Noor Begum d/o: Anwar Khan Mineral Dev deptt
 629. Halder Ali s/o: Mumtaz Khan E & AD deptt
 630. Muhammad Sahir s/o: Muhammad Akram Ministry of Federal for education and professional
 deptt
 631. Asmat Ullah Khan s/o: Taza Gil Transport deptt
 632. Imtiaz Khan s/o: Abdul Wahid Energy & power deptt
 633. Muhammad Javed Akhtar s/o: Khuda Bakhsh E & AD deptt
 634. Muhammad Jehangir Rahman s/o: Nabi ur Rahman Environment deptt
 635. Amjad Ali s/o: Nawab Shah E & AD deptt
 636. Shumalla d/o: Muhammad Afzal Home deptt
 637. Fahim Ullah s/o: Bilawal Khan Information deptt
 638. Raza Khan s/o: Bacha Khan Finance Deptt
 639. Naveed Alam s/o: Fazle Sattar Mineral Dev Deptt
 640. Mazhar ul Islam s/o: Muhammad Younas Malak Health Deptt
 641. Muhammad zaheer s/o: Muhammad Bashir Qurashi Housing deptt
 642. Khan Zaman s/o: Sher Bandi Khan Housing deptt
 643. Gul Nawaz s/o: Sharif Gul Housing deptt
 644. Zunaira Rashid d/o: Abdul Rashid E & AD
 645. Qasim Ali Awan s/o: Sabbir Ahmad Awan mineral Dev deptt
 646. Farmanullah s/o: Tasleem Khan Home deptt
 647. Syed Mansoor Ahmad s/o: syed Badshah Gul Agriculture deptt
 648. aziz ur Rahman s/o: Abdur Rehman Mineral Dev deptt
 649. Nisar Ahmad s/o: Abdullah Irrigation deptt

Section Officer (Litigation)
 Government of P.
 Establishment Department

650. Said Shah Bacha s/o: Fazle Moula Bacha E & AD deptt
651. Muhammad Ashraf s/o: Muhammad, Sherin E & Ad deptt
652. Akbar zaman s/o; Haider Zaman Irrigation deptt
653. Saeed Ahmad Khan s/o; Haji Ibrahim Khan Local govt deptt
654. Hanif Ullah s/o; Khan zareen Finance deptt
655. Abdur Rashid Khan s/o; Fida Muhammad Khan E & AD Deptt
656. Ateeque ur Rahman s/o; Muhammad Shafique Irrigation deptt
657. Syed Azam Shah s/o; Syed Rasool shah on deputation to private school regulatory Authority
658. Bilal Khan s/o; Pir Muhammad Finance deptt
659. Muhammad Awais Ali s/o; Saif Ullah on deputation to private school regulatory Authority
660. Muhammad Arif s/o; Jehanzeb Home deptt
661. Arsalan Ahmad s/o; Muhammad Shokat on EMA deputation basis
662. Farid Khan s/o; zareen Khan Finance deptt
663. Vijay Hameed s/o; Hameed Patras P & D deptt
664. Abdul Basit s/o; Muhammad Riaz E & Ad deptt
665. Sohail Zafar Amin Transprt deptt
666. Muhammad Shadman Saifi s/o; Amin Khan PMS BS-17
667. Naeem Shah s/o; Rahmat Shah sports deptt
668. Sher Aziz Khan s/o; Ghulam Sardar ST & IT deptt
669. Abdul Haleem s/o; Ghulam Akbar Industries deptt
670. Ali Gohar s/o; Fazal Yazdan Law deptt
671. Syed Naseeruddin s/o; Syed Akhtar Shah E & SE deptt
672. Fazle akbar s/o; rafiq gul Finance deptt
673. Umar Gul s/o; Wazeer Gul LGE & RD deptt
674. Aziz ud Din s/o; Khoshwnt Khan E&AD deptt
675. Atif Pervez s/o; Pervez Bhatti CM Sectt
676. Kashif Munir s/o; Mujnir E & AD deptt
677. Abdul Rab s/o; Abdul Rahim Bacha P & D deptt
678. Taseem Gul CM Sectt
679. Abdul Majeed s/o; gul Ahmad Finance deptt
680. Niaz Ali s/o; Sher Afzal Khan Law deptt
681. Zar badshah s/o; Said Asghar igher education deptt
682. Raham Daraz s/o; Moidar Ali Khan Environment deptt
683. Shahi Mand s/o; Ghufiran Finance deptt
684. Imran Saeed s/o; Mushtaq Ahmad Finance deptt
685. Mehboob Shah s/o; Mir Badshah E & AD deptt
686. Zakia Sumbal Khan d/o; ghulam Muhammad Khan Home deptt
687. Muhammad Ali s/o; Akbar Shah Finance deptt
688. Abdul Shakoor s/o; Abdul Rashid Governor House
689. Farhad Khan s/o; Shamshad Khan sports deptt
690. Rambal Gul s/o; Awni Gul Home deptt
691. Muhammad Latif s/o; Nadir Khan Finance deptt
692. Ghulam Akbar Ali Akbar Irrigation deptt
693. Fahad Khan s/o; Afsar Khan Mineral Dev deptt
694. Said Naeem s/o; Anwar Shan Finance deptt
695. Malang s/o; Abdul Haq E & AD deptt
696. Usman Javed s/o; Javed Iqbal E & Ad deptt
697. Mubashir Khan s/o; Farman Ullah on deputation to private school regulatory Authority
698. Syed Ali Ijaz Hussain Shah s/o; Syed Lai Hussain Shah Gallat Dev authority on deputation
699. Wajahat Raza Qureshi s/o; Muhammad Tasaddiq Health deptt
700. Arab Gul s/o; Sher Badshah E & AD Deptt
701. Muhammad Waqas s/o; Muhammad Ayaz Finance deptt
702. Muhammad Hamid Ullah s/o; Sana Ullah Khan E & AD deptt
703. Sabz Ali Khan s/o; Shahzada Khan governor House
704. Muhammad Ilyas s/o; Amir Nawaz Finance deptt
705. Izaz Iqbal s/o; Mohammadin Gul PHE deptt
706. Fayyaz Khan s/o; Aziz Gul population welfare deptt
707. Noor Wali s/o; Muhammad Usman Energy & power deptt
708. Shahid Aziz s/o; Abdul Aziz Finance deptt
709. Muhammad Asif s/o; Roshan Khan Auqaf deptt
710. Imtiaz Ali Khan s/o; Malikboob Ali Khan Energy & power deptt
711. Ajmal Khan STI - E 7 AD
712. Sawan Das Finance deptt
713. Mukaram Khan s/o; fazal Wahab Law deptt
714. Syed Jehangir Shah s/o; Muhammad Shah Finance deptt
715. Farmanullah s/o; Niaz Majan CM Sectt
716. Muhammad Irfan Anjum s/o; Muhammad Bakhsh Anjum Agriculture deptt
717. Muhammad Saeeds/o; shafi ullah sports deptt
718. Muhammad Imran Anjum s/o; Muhammad Bakhshish Anjum E & Ad deptt
719. Shaukat Ali s/o; Fazal Karim social welfare deptt
720. Shumaila d/o; Mir Daraz Khan E & Ad deptt
721. Zar Muhammad s/o; Wazir Khan E & Ad deptt
722. Zafeer Gul s/o; Alf Gul E & Ad deptt
723. Amjad Ali s/o; Feroz Khan higher education deptt
724. Fayyaz Ali s/o; gul dad shah environment deptt
725. Victor John s/o; gulzar Masih E & Ad deptt
726. Hazrat Khan s/o; Hassan Khan Finance deptt
727. Amir Bahadar Khan s/o; Shamshe Bahadar C & W deptt
728. Syed Wazir Ali shah s/o; Syed Jamal shah Health deptt
729. Nalheed Gul s/o; Sardar gul E & Ad deptt
730. Ziaullah s/o; Abdul Aziz Mineral deptt
731. Inayat ur Rahma s/o; Mir Rahman Finance deptt
732. Qaiser Khan s/o; nawab Khan Home deptt


Section 2 (b) (iii) (iv) (v) (vi) (vii) (viii) (ix) (x) (xi) (xii) (xiii) (xiv) (xv) (xvi) (xvii) (xviii) (xix) (xx) (xxi) (xxii) (xxiii) (xxiv) (xxv) (xxvi) (xxvii) (xxviii) (xxix) (xxx) (xxxi) (xxxii) (xxxiii) (xxxiv) (xxxv) (xxxvi) (xxxvii) (xxxviii) (xxxix) (xxxx) (xxxxi) (xxxxii) (xxxxiii) (xxxxiv) (xxxxv) (xxxxvi) (xxxxvii) (xxxxviii) (xxxxix) (xxxxx) (xxxxxi) (xxxxxii) (xxxxxiii) (xxxxxiv) (xxxxxv) (xxxxxvi) (xxxxxvii) (xxxxxviii) (xxxxxix) (xxxxxx) (xxxxxxi) (xxxxxxii) (xxxxxxiii) (xxxxxxiv) (xxxxxxv) (xxxxxxvi) (xxxxxxvii) (xxxxxxviii) (xxxxxxix) (xxxxxxx) (xxxxxxxi) (xxxxxxxii) (xxxxxxxiii) (xxxxxxxiv) (xxxxxxxv) (xxxxxxxvi) (xxxxxxxvii) (xxxxxxxviii) (xxxxxxxix) (xxxxxxxix) (xxxxxxxix) (xxxxxxxix)

733. Mumtaz Ali Shah s/o: Amir Shah E & Ad deptt
734. Sajjad Ali s/o: Ad deptt /o: Abdul Wahab
735. Parvez Khan s/o: Ghani ur Rahman STI- E & Ad deptt
736. Hameed Khan S/O: Kachkol Khan CM Sectt
737. Abdul Akbar s/o: Rafiq Gul finance deptt
738. Liaqat Ali Khan Qalandar Khan E & Ad deptt
739. Arif Hussain Shah s/o: Syed Godi Hussain Shah CM Sectt
740. Zafar ullah s/o: Ikram Ullah Health deptt
741. Fayyaz Hussain s/o: Mumtaz Khan Finance deptt
742. Raza Muhammad s/o: Din Muhammad E & Ad deptt
743. Asad Mehmood s/o: Hassan Mehmood Excise & Taxation deptt
744. Ayat ullah s/o: Faiz ur Rahman E & Ad deptt
745. Hammad Saleem Khan s/o: Muhammad Saleem Khan Irrigation deptt
746. Mahmood Ullah s/o: Noor Zali Khan CM Sectt
747. Naseeb Khan s/o: Lal Jan P & D deptt
748. Syed Asif Nawaz s/o: Syed Amir Nawaz CM Sectt
749. Riz ul Haq s/o: Fazal e Akbar Food deptt
750. Ijaz Khan s/o: Bahadar Sher LGE & RD deptt
751. Sakhawat Ali Shah s/o: Ahmad Shah Home deptt
752. Farman Ali s/o: Abdul Raziq Finance deptt
753. Syed Sarwar Shah s/o: Syed Feroz Shah finance deptt
754. Syed Yousaf Ali Shah s/o: syed Akbar Shah E & Ad deptt
755. Zarshaid s/o: Gulshaid Khan higher education deptt
756. Haider Khan s/o: Muhammad Ibrahim EHE deptt
757. Muhammad Riz s/o: Khushal Khan finance deptt
758. Muhammad Wajid s/o: Khan Muhammad Agriculture deptt
759. Wasil Ahmad s/o: Nazir Ahmad Energy and power deptt
760. Falzanullah s/o: Muhammad Zabeer LGE AND RD deptt
761. Hameed Ullah s/o: Falzullah E & SE deptt
762. Muhammad Naveed Tariq s/o: Muhammad Tariq P & D deptt
763. Muhammad Adeel s/o: Rahat Shah Environment deptt
764. Hasham Ali Khan s/o: Said Wali Khan Irrigation deptt
765. Hazrat Ullah s/o: H. Qooqat Khan Governor house
766. Muhammad Fayaz s/o M. Sarwar E & SE deptt
767. Gul Hassan s/o: Taws Khan LGE & RD deptt
768. Muhammad Tahseen s/o; M. Maskeen E & Ad deptt
769. Muhammad Adnan s/o: M. Younas Finance deptt
770. Hazrat Bilal s/o: raj Wali Shah Administration deptt
771. Sulaiman Shah s/o: Malik Aman E & AD deptt
772. Muhammad Younas s/o: Mir Khan Shah Higher education deptt
773. Faisal Sarwar s/o; M. Sarwar Environment deptt
774. Zahir Shah s/o: Abdul Aziz higher education deptt
775. Aftab Ahmad s/o: Irshad Gul E & SE deptt
776. Muhammad Sabir s/o: Abdul Rehman Governor House
777. Bakhtiar Khan s/o: Sanobar Khan governor house
778. Inayat ur Rahman s/o: Salf ur Rahman Higher education deptt
779. Zartaj Wali s/o: said wali Khan CM Sectt
780. Imran Ahmad s/o: Muhammad Afzal E & SE deptt
781. Said Karam s/o: Saeed ullah Khan Industries deptt
782. Abdul Basit s/o: Kiramat Shah ST & IT deptt
783. Anwar ul Habib s/o Rehmat Gul sports deptt
784. Sherdil Khan s/o Solibat Khan social welfare deptt
785. Beenish d/o: Abdul Qadeer Finance deptt
786. Zabeehullah s/o: Noor Rehman Law deptt
787. Zeeshan Faruq s/o: Mian Muhammad CM Sectt
788. Imran s/o: Afzal Finance deptt
789. Abbas Jan s/o: Ashraf ud Din E & SE deptt
790. Farhad Khan s/o: Gul Zaman E & AD deptt
791. Naresh Lal s/o: Hameed Lal Bhatti E & AD deptt
792. Altaf Hussain s/o: Masal Khan Energy & power deptt
793. Muhammad Bilal s/o: Muhammad Wali P & D deptt
794. Aamir Salim s/o: Khurshid ur Rehman CM Sectt
795. Faheema d/o: Arsala Khan Finance deptt
796. Waheela Younas d/o: Muhammad Younas Awan Finance deptt
797. Usman Ali s/o: Sakhi Rahman LGE & RD deptt
798. Noor Elahi s/o Muhammad Shafi transport deptt
799. Zar Ali s/o: Abdul Samad Khan PHE deptt
800. Irfan Ullah s/o: Akhtar Shah Law deptt
801. Aurangzeb s/o: Fazal ur Rahman E & AD deptt
802. Moqsood Ahmad s/o: Mohammad Iqbal E & SE deptt
803. Waqas Muhammad s/o: Muhammad Ullah KP-PSRA
804. Ahmad Ali Shah s/o: Mehrban Shah Finance deptt
805. Farrukh Saif s/o: Farid Khan Relief deptt
806. Zaheer ud Din s/o: Zahir Khan E & AD deptt
807. Muhammad Javed s/o: E & SE deptt
808. Imran Khan s/o: Nasir Khan Irrigation deptt
809. Imran Ullah s/o: Muhammad Khan Finance deptt
810. Iftikhar Ali s/o: Fazal Qadir Higher education deptt
811. Assad Ullah Khan s/o: Muhammad Iqbal E & D deptt
812. Masood Khan s/o: Rana Khan Finance deptt
813. Ashiq Hussain s/o: Abdullah Jan E & Ad deptt
814. Muhammad Asad Sohail s/o: M. Aslam Labour deptt
815. Farhan Baber s/o: Rizvan ullah IPC deptt

Section Officer (Litigation)
Government of K.P.
Establishment Department

816. Munir Khan s/o: Sardar Khan Excise deptt
817. Hazrat Hilal Finance deptt
818. Abid Khan Abid s/o: Abdul Marjan CM deptt
819. Kashif Hussain s/o: Riaz Hussain PHE deptt
820. Qamar zaman s/o: Muhammad zaman State office
821. Jamshed Alam s/o: Zafar Alam E & AD deptt
822. Asmat Ullah Khan s/o Hazrat Ali Khan Finance deptt
823. Ahsan Ullah s/o: aman ullah Agriculture deptt
824. Muhammad Hassan s/o: Taj Muhammad Finance deptt
825. Habit Rizwan s/o Nizam ud din Finance deptt
826. Ifthidar Ahmad Finance deptt
827. Ihsan Ullah s/o: Shah Zada Khan Finance deptt
828. Tahsin Ullah s/o: Mir Adam Khan Relief deptt
829. Abdul Wahab s/o: Fazlur Rahim governor Sectt
830. Muhammad Amjad s/o: Aurangzeb Awan E & AD deptt
831. Syed Ihsanullah Shah s/o: Mubarak Shah Health deptt
832. Shahab ud Din s/o: Sher Zada Mineral Dev deptt
833. Uzma d/o: Shahjehan E & D deptt
834. Zahir Ahmad s/o: Munir Ahmad Irrigation deptt
835. Muhammad Irshad s/o: Mehmood Khan E & Admn
836. Muhammad Farooq s/o: Muhammad Naseem Agriculture deptt
837. Amir ul Haq s/o: Bakhtoor Khan Finance deptt
838. Riaz Khan s/o: Ziarat Gul account section
839. Muhammad Yaqub s/o: Muhammad Nawaz Administration deptt
840. Irfan Ullah s/o: Zar Gul Fida Law deptt
841. Muhammad Zubair Khan s/o: Mumtaz Ghani E & Ad deptt
842. Saleem Ullah Khan s/o: Ihsan Ullah Health deptt
843. Hukam Khan s/o: Ayoob Khan E & Ad deptt
844. Imran Nabi s/o: Hazrat Nabi Industries deptt
845. Anwar zaib s/o: Muhammad Ullah E & AD deptt
846. Shahid Khan s/o: Qandahar Khan E & Ad deptt
847. Hawas Ali s/o: Munkif Ali Health deptt
848. Shams ul Haq s/o: Ghulam Hussain Finance deptt
849. Shams ud Din s/o: Qazi Sultan Muhammad Finance deptt
850. Noor ul Islam s/o: Noor Muhammad E & AD deptt
851. Sardar Dawood s/o: Ziarat Ghulam E & AD deptt
852. Yousaf ur-Rahman s/o: Yousaf Balg Finance deptt
853. Muhammad Matloob s/o: Muhammad Suleman E & Ad deptt
854. Naveed Ullah s/o: Saif Ullah Kp- PSRA
855. Fakhr ud Din s/o: Saif Ullah Health deptt
856. Syed Zeeshan Shah s/o: Syed Iqbal Shah KP- PSRA
857. Nisar Ahmad s/o: Abdul Azeem Administration Deptt
858. Yunas bacha Irrigation deptt
859. Mudassir Shah s/o: Fozal Shah LOE & RD deptt
860. Mujeeb ur Rahman s/o: farman Ali Auqaf deptt
861. Haidar Rasheed s/o: Abdur Rashid Health deptt
862. Muhammad Yasir s/o: Muhammad Qasim Law deptt
863. Asghar Ali s/o: Nawab Khan Health deptt
864. Fazal Ahmad s/o: Sahibzada E & AD deptt
865. Sama bukhari d/o: Khalid Mehmood E & SE deptt
866. Irfanullah s/o: Muhammad Afzal Law deptt
867. Danial Khan s/o: Gul Amin Home deptt
868. Saleem Ahmad Shah
869. Sultan Muhammad Superintendent Home Dept Peshawar
870. Roled Ullah Khan Superintendent law Dept Peshawar
871. Jan Nisar
872. Mustajab Khan
873. Amanullah s/o: Saib ali Jan
874. Dilshad Khan Superintendent E & SE Dept Peshawar
875. Zulfikar Ali Superintendent P & D Dept Peshawar
876. Khalil Khan Superintendent Home Dept Peshawar
877. Imtiaz Ali Superintendent Home Dept Peshawar
878. Khalid Hayat Superintendent Finance Dept Peshawar
879. Atta Khan Superintendent Higher Edu Dept Peshawar
880. Hakim Ullah Superintendent finance Dept Peshawar
881. Muhammad Ilyas Superintendent E & AD Dept Peshawar
882. Ali Haider Superintendent Home Dept Peshawar
883. Muhammad Farid s/o: Aziz ur Rahman
884. Abdur Razaq Superintendent ST & ET Dept Peshawar
885. Muhammad Fafique s/o: Fazle Ahmad Superintendent finance Dept Peshawar
886. Hazrat Shah s/o: Niqab Shah Superintendent population Dept Peshawar
887. Jauhar Akbar Superintendent population Dept Peshawar
888. Pervez Ahmad Superintendent E & ED Dept Peshawar
889. Abdul Latif s/o: Abdul Aziz Superintendent Agriculture Dept Peshawar
890. Imtiaz Ahmad
891. Tariq Mahmood
892. Ifthidar Ahmad
893. Wisal Muhammad
894. Sayyar Ahmad
895. Qabil Saib
896. Nadir Khan
897. Wilayat Khan
898. Hakim Khan

All are Assistants (624-to-867)


Section Officer (Litigation)
Department of
Establishment Department

899. Sher Zamin Khan Superintendent Governor Secretariat Dept Peshawar
 900. Muhammad Aylb s/o: Mir Azam Baig
 901. Muhammad Aftab Superintendent Finance Dept Peshawar
 902. Zarshad Khan s/o: Ulas Khan Superintendent population Dept Peshawar
 903. Muhammad Ayaz Superintendent Auqaf Dept Peshawar
 904. Rasool Muhammad
 905. Shakeel Ahmad s/o: Wajeed Gul
 906. Arshad Aziz Qureshi
 907. Ali Nawaz Khan s/o: Hassan Badshah
 908. Shah Baht
 909. Khan Raziq
 910. Nasib Khan
 911. Abdur Rahman s/o: Abbas Ali Khan
 912. Fazal ur Rahman Superintendent Excise & Taxation Dept Peshawar
 913. Syed Muhtashim Ahmad Shah s/o: Syed Noor Muhammad
 914. Zahid Shams
 915. Zahoor Shah
 916. Samin Jan
 917. Pervez Khan Superintendent transport Dept Peshawar
 918. Umar Zada
 919. Amanullah s/o: Karim Gul
 920. Muhammad Ilyas s/o; Muhammad Ishogue
 921. Feroz Khan
 922. Muhammad Ibrahim s/o: Akhtar Munir
 923. Irfanullah Superintendent Governor House Dept Peshawar
 924. Muhammad Iqbal s/o: Hazrat Shah
 925. Iftikhar Superintendent E & SE Dept Peshawar
 926. Muhammad Ishaq s/o: Ghulam Haider
 927. Shaikat Zaman
 928. Sahibzada Abbas Khan
 929. Aqil Javed
 930. Obaidullah Superintendent Home Dept Peshawar
 931. Dost Muhammad Superintendent IPC Dept Peshawar
 932. Savinder Kumar s/o: Kor Chand
 933. Shah Wali Khan s/o: Bakht Balidar
 934. Juma Khan Superintendent P&D Dept Peshawar
 935. Riaz Khan Superintendent E&AD Dept Peshawar
 936. Sald Faqir Superintendent P&D Dept Peshawar
 937. Khalil ur Rahman Superintendent E&SE Dept Peshawar
 938. Rahmat Khan
 939. Milan Shah Hussain
 940. Bakhtiar Wali Khan s/o: Wali Zar Khan Wali
 941. Hamayun Khan s/o: Waisul Khan Superintendent Housing Dept Peshawar
 942. Hashmatullah Superintendent law Dept Peshawar
 943. Shahmshad Hussain Superintendent E & SE Dept Peshawar
 944. Shal Muhammad Superintendent Mineral Dept Peshawar
 945. Umarbazz Superintendent PHE Dept Peshawar
 946. Shahbaz Khan Superintendent Health Dept Peshawar
 947. Atmal Kha s/o: Jehangir Khan
 948. Muhammad Kamran Superintendent law Dept Peshawar
 949. Syed Muhammad Asif Sattar Superintendent E&AD CS issue Dept Peshawar
 950. Muhammad Saleem Sajid
 951. Sher Ali Khan Superintendent IE&SE Dept Peshawar
 952. Sawab Gul Superintendent Environment Dept Peshawar
 953. Muhammad Javed s/o: Shah Zaman Superintendent law Dept Peshawar
 954. Rahmat Shah Superintendent Finance Dept Peshawar
 955. Muhammad Nawab Superintendent E&AD HRD II Section Dept Peshawar
 956. Muhammad Riaz s/o: Sher Khan Superintendent PHE Dept Peshawar
 957. Attiqur Rahman s/o: Muhammad Ayub Superintendent E&SE Dept Peshawar
 958. Muhammad Farooq Superintendent Transport Dept Peshawar
 959. Bahar ud Din Superintendent Finance Dept Peshawar
 960. Ijaz Rahim Superintendent Transport Dept Peshawar
 961. Shehryar Ahmad Superintendent excise Dept Peshawar
 962. Gul Nawaz Khan s/o: Nek Nawaz Khan Superintendent Information Dept Peshawar
 963. Zhaif Mehmood Superintendent C&W Dept Peshawar
 964. Fazli Rauf Superintendent law Industries Peshawar
 965. Sona Khan Superintendent P&D Dept Peshawar
 966. Muhammad Hashim Khan Superintendent CM secretariat Dept Peshawar
 967. Kifayatullah s/o: Abdus Samad Superintendent law Excise & Taxation Peshawar
 968. Miraj s/o: Niaz Muhammad Superintendent Agriculture Dept Peshawar
 969. Muhammad Bashir Superintendent E&AD Dept Peshawar
 970. Hazrat shah s/o: Ahmad Shah Superintendent PHE Dept Peshawar
 971. Muhammad Riaz s/o: Abdur Rahman Superintendent Higher edu Dept Peshawar
 972. Bakhtiarullah Superintendent E&AD Dept Peshawar
 973. Muhammad Hanif Superintendent information Dept Peshawar
 974. Inayatullah s/o: Abdur Rashid P&D Superintendent P&D Dept Peshawar
 975. Abdul Hannan Superintendent E&SE Dept Peshawar
 976. Ejaz Muhammad Superintendent Transport Dept Peshawar
 977. Muhammad Saleem s/o: Noor Muhammad Superintendent E & AD Dept Peshawar
 978. Mushtaq Shah Superintendent P&D Dept Peshawar
 979. Khizer Hayat Superintendent Finance Dept Peshawar
 980. Muhammad Tufail Superintendent Health Dept Peshawar
 981. Shamsul Islam Superintendent finance Dept Peshawar

Section Officer (Litigation)
 Government of KP
 Establishment Dept.

- 982. Mustafa Kamal Superintendent environment Dept Peshawar
- 983. Muhammad Qureshi Superintendent C&W Dept Peshawar
- 984. Jehanzeb Superintendent Home Dept Peshawar
- 985. Muhammad Aslam s/o: Sher Bandi Khan Superintendent Governor House Dept Peshawar
- 986. Sultan Shah Superintendent E & AD Dept Peshawar
- 987. Noureen Kayani Superintendent population Welfare Dept Peshawar
- 988. Umar Gul Afridi Superintendent E & AD Dept Peshawar
- 989. Shah Wali Khan s/o: Khoidad Khan Superintendent CM Secretariat Dept Peshawar
- 990. Ghulam Mustafa Haider Superintendent Finance Dept Peshawar
- 991. Abdul Qadeem Superintendent E & AD Dept Peshawar
- 992. Ayan Shih Superintendent E & AD Dept Peshawar
- 993. Zahir Shah s/o: Lal Muhammad Superintendent E & SE Dept Peshawar
- 994. Fazil Hison s/o: Fazil Wahid Superintendent Finance Dept Peshawar
- 995. Syed Obaidullah Shah Superintendent Environment Dept Peshawar
- 996. Abdul Khalq Superintendent CM Secretariat Dept Peshawar
- 997. Abdul Latif s/o: Ibrahim Khan Superintendent Finance Dept Peshawar
- 998. Iftekhar s/o: Abdul rauf Superintendent Labour Dept Peshawar
- 999. Badri Zaman Superintendent E & AD Dept Peshawar
- 1000. Amjad Ali Superintendent Sport Dept Peshawar
- 1001. Zelle Ali Haidari Superintendent Home Dept Peshawar
- 1002. Zahidullah s/o: Naqibullah Khan Superintendent C&W Dept Peshawar
- 1003. Asim Anwar Superintendent Finance Dept Peshawar
- 1004. Manzoor Ahmad s/o: Sher Muhammad Superintendent ST&IT Dept Peshawar
- 1005. Shah Faisal Khan Superintendent Mineral Dept Peshawar
- 1006. Muhammad Yasir Superintendent ICP Culture Tourism Dept Peshawar
- 1007. Saeeda Khan Superintendent Food Dept Peshawar
- 1008. Neelam Superintendent Finance Dept Peshawar
- 1009. Burhan ud Din Superintendent EMA Dept Peshawar
- 1010. Sidra Ahmad
- 1011. Noor sher
- 1012. Majid Hanan Lodhi Superintendent E&AD Dept Peshawar
- 1013. Laeeq Ahmad Superintendent law E&AD Peshawar
- 1014. Mustajabul Haq Superintendent Social Welfare Dept Peshawar
- 1015. Farman Ali Superintendent Health Dept Peshawar
- 1016. Wazir Muhammad Superintendent Finance Dept Peshawar
- 1017. Zafarullah s/o: Arsala Superintendent Irrigation Dept Peshawar
- 1018. Syed Farooq Shah Superintendent Admn Dpt Peshawar
- 1019. Shakeel Ahmad Superintendent Finance Dept Peshawar
- 1020. Faroh Seyar Superintendent E&AD Dept Peshawar
- 1021. Shaid Iqbal Superintendent Finance Dept Peshawar
- 1022. Mohsin mushfaq Superintendent E&AD Dept Peshawar
- 1023. Muhammad Noman Superintendent E&AD Dept Peshawar
- 1024. Saman Zaman Superintendent Finance Dept Peshawar
- 1025. Huma Bakhtiar Superintendent P&D Dept Peshawar
- 1026. Muhammad Kaleem Jan
- 1027. Usman Khan s/o: Aziz
- 1028. Asmat Ullah s/o: Ayub Khan
- 1029. Syed Sardar Badshah
- 1030. Aamir Shahzad Khattak
- 1031. Syed Muhammad Ihsan Superintendent mineral Dept Peshawar
- 1032. Muhammad Sohail Superintendent Home Dept Peshawar
- 1033. Sitwat Superintendent Energy & Power Dept Peshawar
- 1034. Muhammad Saleem Superintendent energy & power Dept Peshawar
- 1035. Muhammad Shafiq Superintendent Health Dept Peshawar
- 1036. Ijaz Muhammad Superintendent Sport Dept Peshawar
- 1037. Syed Akhtar Ali Shah Superintendent Finance Dept Peshawar
- 1038. Adnan yousaf Muhammad Aqeel Superintendent Home Dept Peshawar
- 1039. Adnan Shaukat Ali Khan
- 1040. Asif Nabi Superintendent PSRA Dept Peshawar
- 1041. Muhammad Aslam Superintendent Finance Dept Peshawar
- 1042. Imran Saleem Superintendent Finance Dept Peshawar
- 1043. Shih Jehan Superintendent Agriculture Dept Peshawar
- 1044. Sartaj Khan Superintendent Relief Dept Peshawar
- 1045. Sohbat Khan Superintendent E&SE Dept Peshawar
- 1046. Fizza Hassan Saeed d/o: Hassan Saeed Ahmad Shah

.....Petitioners

Versus

- 1. Hanif ur Rahman, Assistant (BPS-16), Directorate of Prosecution Khyber Pakhtunkhwa.
- 2. Government of Khyber Pakhtunkhwa through its Chief Secretary at Civil Secretariat Peshawar and others.
- 3. Government of Khyber Pakhtunkhwa through Secretary Finance Department at civil secretariat Peshawar.
- 4. Secretary Administration and Establishment civil Secretariat Peshawar.

.....Respondents

Section Officer (Litigation)
 Establishment of
 Establishment of

20

Application under Section 12(2) of Civil Procedure Code 1908, for setting aside judgment/ order dated: 14-01-2022 obtained by respondent No. 1 on the basis of fraud and mis-representation from the Hon'ble Service Tribunal Peshawar in service appeal No: 1227/2020.

Respectfully Sheweth:

The petitioners present their grievance as under:

1. That respondent No: 1 filed service appeal under section 4 of Khyber Pakhtunkhwa Service Tribunal Act 1974 on 21.09.2020 against respondents No 2-3 before Khyber Pakhtunkhwa Service Tribunal Peshawar. (Copy of service appeal is attached as annexure A)
2. That respondent No: 1 deliberately did not make party the respondent No: 4 and the petitioners in the instant appeal and obtained the judgment dated 14.01.2022 in his favour. (Copy of judgment is attached as annexure B)
3. That few days back before the institution of instant application the petitioners came to know about the judgment of the Hon'ble Court and soon thereafter the petitioners moved the instant application against the judgment dated: 14.01.2022 on the following grounds inter-alia:

GROUNDS:-

- A. That respondent No: 1 fraudulently obtained, the order from the Hon'ble Court and deliberately did not make party, the petitioners and the respondent No: 4. The impugned order adversely affect the petitioners being regular employees of the department and if the judgment of the Hon'ble Court is satisfied/complied in favour of respondent No: 1 and others, it will affect the seniority of petitioners who were neither party to the Service Tribunal nor they were heard before passing the judgment dated: 14.01.2022. (Copy of the seniority list of petitioners is attached as annexure C)
- B. That respondent no: 1 challenged the notification dated: 25.06.2019 according to which the competent Authority was pleased to declare the 117 employees appointed by FATA Secretariat as "Surplus" and placed them Surplus pool of Establishment and Administration Department for their further adjustment/placement w.e.f. 01;07.2019, respondent No: 1 challenged the notification of respondent no: 4, but fraudulently he did not make party the Respondent no 4 in an Service Appeal and in this garb he obtained the impugned judgment in his favour. (Copy of notification is attached as annexure D)
- C. That the Service Appeal of respondents was not maintainable for want of mis-joinder and non-joinder of necessary parties but respondent No: 1 deliberately and fraudulently did the same just to obtain judgment in his favour.
- D. That petitioners and other thousands of regular employees of Establishment department were condemned unheard as the issue in service appeal was directly involved with the petitioners and other employees of the department and the impugned judgment dated: 14.01.2022 will certainly affect the seniority of all cadres in civil secretariat and will also disturb promotion of all cadres in civil secretariat but respondent No: 1 deliberately and fraudulently misrepresented the said service appeal.
- E. That due to the 25th Constitutional Amendment Act 2018 the FATA was merged in to Khyber Pakhtunkhwa and due to that reason respondent no: 1 and other employees of FATA were placed in Surplus pool, Surplus was rightly created in accordance with section 11A of Civil Servant Act 1973, so as per Surplus pool

Section Officer (Litigation)
Government of KP
Establishment Department

policy, the seniority of the respondent No: 1 will be fixed as per para No: 6 of the policy but respondent No: 1 intentionally misguided the court to get the impugned order in his favour. (Copy of Surplus pool policy is attached as annexure E)

- F. That the petitioners were not in knowledge and totally unaware in respect of proceedings of the subject appeal and judgment passed in the back of Petitioners, hence the judgment is faultful, illegal and is void, needs to be rejected.
- G. That the Respondents fraudulently obtained the Judgment and deliberately concealed crucial points of the case from the Hon'ble Court.
- H. That the Order, Judgment dated: 14.01.22 passed by the Hon'ble court is erroneous, wrong and passed without considering the legal and factual grounds because that the court has overlooked the fact that the present petitioners and establishment/ respondent No: 4 were neither present before the court nor arrayed parties in the appeal filed by the appellants/Respondents which tantamount to raising objection which fact was not considered by the court and passed the impugned Order, Judgment.
- I. That the Hon'ble Court passed Order, Judgment only on the basis of appellants/respondents claim one sided and the petitioners were not heard, thus the Order arrived at by the court is based on misrepresentation that merits dismissal.

In view of these state of affairs, It is, therefore, most respectfully requested that while allowing this petition, the order dated: 14-01-2022 may graciously be set aside and recalled and all steps taken on the basis of this fraudulent and without jurisdiction order/judgment may also be recalled. Any other relief which the Hon'ble Court deems proper may also be awarded in favour of petitioners.

Dated: 23-09-2022

Petitioners
Through
M. Zia Ullah
M. Imran Khan,
Advocate High Court,
Peshawar




Verification:

It is verified upon oath that all the contents of this Petition are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this Hon'ble Court.

Through

Deponents

Attorney


Section Officer (Litigation)
Government of KP
Establishment Department

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

MUHAMMAD SADIQ AND OTHERS Versus HANIF UR RAHMAN AND OTHERS

APPLICATION FOR THE GRANT OF ORDER OF SUSPENSION OF EXECUTION
PETITION NO: 242/2022 OF JUDGMENT DATED: 14/01/2022 TILL THE FINAL
DISPOSAL OF INSTANT PETITION.

RESPECTFULLY SHEWETH!

The Petitioners most humbly submits as under:-

1. That the instant application for suspension of execution proceeding is filed along with petition under section 12 (2) CPC today in which no date of hearing has yet been fixed.
2. That the contents of the petition and the supportive documents may be considered as integral part of this application at the time of its disposal.
3. That in view of the contents of the petition and Annexures, the Petitioners have got a good prima- facie case and they are sanguine in respect of their success.
4. That the balance of convenience also lies in favour of Petitioners and in case of acceptance of subject petition, there is no inconvenience to Respondents/appellants.
5. That unless and until the subject application is allowed and execution is not suspended in favour of the Petitioners, the Petitioners will suffer irreparable loss and the petition will become meaningless and baseless.

IT IS, THEREFORE, MOST HUMBLY PRAYED THAT ON THE ACCEPTANCE OF THIS APPLICATION, AN ORDER OF SUSPENSION OF EXECUTION PROCEEDING AS REQUESTED HEREIN ABOVE MAY GRACIOUSLY BE PASSED IN FAVOUR OF PETITIONERS AND AGAINST RESPONDENTS/APPELLANTS TILL FINAL DISPOSAL OF THE PETITION.

Dated: 23-09-2022

APPLICANTS
Through
M. Zia Ullah
M. Imran Khan,
Advocate High Court,
Peshawar

Verification:

It is verified upon oath that all the contents of this Petition are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this Hon'ble Court.

Deponents
Through
Attorney

Section Officer (Litigation)
Government of K
Establishment De

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

MUHAMMAD SADIQ AND OTHERS Versus HANIF UR RAHMAN AND OTHERS

APPLICATION FOR THE GRANT OF ORDER OF CLUBBING THE ABOVE
CAPTIONED PETITION WITH EXECUTION PETITION NO: 242/2022 OF JUDGMENT
DATED: 14/01/2022 IN WHICH NEXT DATE OF HEARING IS 27.09.22

RESPECTFULLY SHEWETH!

The Petitioners most humbly submits as under:-

1. That the above captioned petition is filed today in which no next date of hearing is fixed till yet.
2. That petitioners also moved an application for suspension of execution petition No: 242/2022 which execution petition is fixed for hearing on 27.09.22.
3. That if the above captioned petition will not be clubbed with the said execution petition the petitioners will suffer great irreparable loss.

It is therefore requested that on acceptance of this application the above captioned petition may kindly be fixed/clubbed with the mentioned execution petition.

Dated: 23-09-2022

APPLICANTS
Through
M. Zia Ullah
M. Imran Khan,
Advocate High Court,
Peshawar

Section (Litigation)
Government of KP
Establishment Department

Surplus Pool Policy

Policy for declaring government servants as surplus and their subsequent absorption/ adjustment.

I am directed to refer to the subject noted above and to say that the Provincial Government has been pleased to make the following policy for absorption/adjustment of Government Servants declared as surplus in view of the transition of District System and resultant re-structuring of the Government Organizations/Departments etc.

1. POWER WITH REGARD TO THE DECLARATION OF POSTS AS SURPLUS.

The Finance Department in consultation with Department concerned and with the approval of competent authority would decide with regard to the declaration of a particular organization, set up or individual post as redundant or inessential.

2. CREATION OF SURPLUS POOL

There will be a surplus pools cell in the E&AD. After abolition of such posts in the concerned department, duly notified by the Finance Department, equal number of posts in the corresponding basic pay scales would be created in the E&AD for the purpose of drawl of pay and allowances etc by the employees declared surplus as such.

3. IMPLEMENTATION/MONITORING CELL

For the purpose of coordination and to ensure proper and expeditious adjustment/ absorption of surplus staff, the Government of NWFP has been pleased to constitute the following committee:-

- a. Additional Secretary(Establishment) E&AD.....Chairman.
- b. Deputy Secretary LG&RD Department.....Member
- c. Deputy Secretary Finance Department.....Member
- d. Deputy Secretary(Establishment) E&AD.....Secretary


4. CRITERIA FOR DECLARING A GOVERNMENT SERVANT AS SURPLUS AS A RESULT OF ABOLITION OF POST.

Consequent upon the abolition of a post in a particular cadre of a department, the junior most employee in that cadre would be declared as surplus. Such posts should be abolished in the respective departments and created in the surplus pool as indicated in para 2 above for the purpose of drawl of pay and allowances and also for consideration for subsequent adjustment.

5. PROCEDURE FOR ADJUSTMENT OF SURPLUS EMPLOYEES

Notwithstanding anything contained in any other law, rules or regulation to the contrary, for the time being in force, the following procedure for the adjustment of surplus staff would be followed:-


- (a) Before transferring an employee to the surplus pool, he should be given option by the concerned department.


 Section Officer (Litigation)
 Government of KP
 Establishment Department

- (i) to proceed on retirement with normal retiring benefits under the existing rules;
- OR
- (ii) to opt for readjustment/absorption against a future vacancy of his status/BPS which may not necessarily be in his original cadre/department.
- (b) Those who opt for retirement would be entitled for usual pension and gratuity according to the existing Government Servants Pension and Gratuity Rules of the Provincial Government. Those who opt for absorption/re-adjustment, a category-wise seniority list will be caused in the surplus pool for their gradual adjustment against the future vacancies as and when occurred in any of the Government Departments. These adjustments shall be on seniority-cum-fitness basis. For this purpose, the seniority list will be caused category-wise with reference to their respective dates of appointment in the cadre. In case where dates of appointment of two or more persons are the same, the person older in age shall rank senior and shall be adjusted first.
- (c) Adjustment shall be made on vacant post pertaining to initial recruitment quota from those in the surplus pool in the following manner:-
- (i) In case of occurrence of vacancies in their corresponding posts in any Government Department/ Organization, the senior most employee in the surplus pool should be adjusted first.
- (ii) In case of cross cadre adjustment, the persons with such minimum qualification as prescribed in the relevant Service Rules for the post in question shall be adjusted keeping in view their seniority position.
- (iii) If an employee possesses the basic academic qualification but lacks the professional/technical qualification, he may be adjusted against such post subject to imparting the requisite training.
- (iv) (a) The surplus employees holding such posts which fall to promotion quota in about all the Departments, he shall remain in the surplus pool till the availability of a post in the parent department.
- OR
- (b) Where no equivalent post is available the civil servant may be offered a lower post in such manner, and subject to such conditions, as may be prescribed and where such civil servant is appointed to a lower post the pay being drawn by him in the post immediately preceding his appointment to a lower post shall remain protected.
- (v) ⁸⁴In case an employee already adjusted against a lower post is declared surplus again, he shall regain his original pay scale.
- (vi) ⁸⁵ Surplus employees, who voluntarily opt, may be allowed adjustment in Autonomous/Semi-autonomous bodies with the concurrence of these bodies, where the job is pensionable. The Government will pay pension contribution for the period they rendered regular service under the Government.

⁸⁴ Sub para c (v) added to para 5 vide circular letter No.SORVI(E&AD)5-1/2005, dated 15.2.2006.

⁸⁵ Sub para c (vi) added to para 5 vide circular letter No.SORVI(E&AD)5-1/2005, dated 31.5.2006.


 Section Officer (Litigation)
 Government of KP
 Establishment Department

- (d) If no suitable person is available in the surplus pool to be adjusted against the vacant/revised post, such a post would be filled up by initial recruitment manner after getting clearance from the E&AD.
- (e) ⁸⁶Surplus Staff in BPS-01 to 15 shall not be adjusted in the district other than their district of domicile.
- (f) To facilitate the adjustment of surplus staff, it will be incumbent upon the Administrative Department to take up the case with Finance Department for revival of the essential posts so retrenched as a result of general directive issued by Finance Department from time to time, giving cogent reasons/justification. Against the resultant revival/restoration of the post, the concerned Department will place a requisition on the E&AD for transferring of suitable surplus employee against the said post.
- (g) Unless the surplus employees in Class-IV are fully adjusted/ absorbed against their respective graded posts in various Government Departments/Organizations, the general policy of the Finance Department regarding conversion of BPS-1 & 2 posts to posts in fixed salary @ Rs.2000/- per month for contractual appointed should be restricted to the above extent.

6. FIXATION OF SENIORITY

The inter-se seniority of the surplus employees after their adjustment in various Departments will be determined according to the following principles:-

- (a) In case a surplus employee could be adjusted in the respective cadre of his parent Department, he shall regain his original seniority in that cadre.
- (b) In case, however, he is adjusted in his respective cadre but in a Department other than his parent Department, he shall be placed at the bottom of seniority list of that cadre.
- (c) In case of his adjustment against a post in a corresponding basic pay scale with different designation/nomenclature of the post, either in his parent Department or in any other department, he will be placed at the bottom of seniority list.
- (d) ⁸⁷In case of adjustment against a post lower than his original scale, he shall be placed at the top of seniority list of that cadre, so as to save him from being rendered surplus again & becoming junior to his juniors.

⁸⁶ (3) Sub para (e) added to para 5 vide circular letter No.SORVI/E&AD/5-1/2005, dated 19.1.2007.

⁸⁷ Sub para d added to para 6 vide circular letter No. SORVI(E&AD)5-1/2005, dated 15.2.2006

Section Officer (Litigation)
Government of KP
Establishment Department

NOTE:-

In case the officer/official declines to be adjusted/absorbed in the above manner in accordance with the priority fixed as per his seniority in the integrated list, he shall lose the facility/right of adjustment/absorption and would be required to opt for pre-mature retirement from Government service

Provided that if he does not fulfill the requisite qualifying service for premature retirement he may be compulsorily retired from service by the competent authority.

7. COMPETENT AUTHORITY TO NOTIFY/ORDER ADJUSTMENT/ABSORPTION.

After the transfer of services of surplus employee to a Department for adjustment/absorption against a vacant/revived post, the Competent Authority to notify/order his absorption/adjustment, shall be the respective appointing authority under the relevant rules for the post.

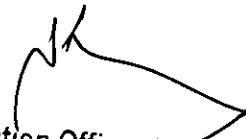
Provided that the decision of adjustment/absorption of surplus employees by the E&AD shall be binding upon the respective appointing authorities.

(Authority: letter NO.SOR-I(E&AD)1-200/98, Dated 8th June, 2001)

Decision of the meeting of chief secretary with district coordination officers, on the issue of surplus pool.

I am directed to refer to the subject noted above and to say that a meeting was held on 4.8.2001 in the Cabinet Room Civil Secretariat under the Chairman of Chief Secretary, NWFP to discuss the issues relating to adjustment of employees rendered surplus due to restructuring of the Government Departments and Devolution of Power Plan, 2000. The following decisions were taken in the said meeting:-


- i) Administrative Departments may reconsider adjustments already made against the available posts at District level. The guiding principle for reviewing the adjustment would be aimed at avoiding dislocation of the employees to the possible extent.
- ii) The DCOs will maintain the surplus pool of the employees, declared surplus in the District cadres and their subsequent adjustment against the vacant posts (District Cadres). It must be ensured that only the junior most employees in the scale in the cadre be declared surplus. At the stage of adjustment of Class-IV posts, the senior most be adjusted first. However, for the other posts besides seniority, the background of the individual and requisite experience of the posts shall be kept in view. The surplus pool of Divisional cadres be maintained by the DCOs posted at divisional headquarters.
- iii) The surplus pool of the employees of the Head Offices be maintained by the Head of the concerned Attached Department. Declaring employees surplus and their subsequent adjustment be made strictly according to the spirit of the policy of the Provincial Government issued vide circular letter No.SORI (S&GAD)1-200/98, dated 8.6.2001.


Section Officer (Litigation)
Government of KP
Establishment Department

- iv) The surplus pool of the Secretariat be maintained by the Establishment Department in consultation with the Department concerned.
- v) The salaries of the surplus employees be disbursed through their relevant offices for the time being.
- vi) It was also felt that the sanctioned staff for the office of DCO and other offices is not sufficient. The ministerial staff has no appropriate tiers for the purpose of control and promotion i.e. Senior Clerk and Superintendent etc. The post of Chowkidar/ Sweeper does not exist in the office of DCOs and other offices. Even the other required staff does not meet the bare minimum. The DCOs will, therefore, forward the required proposal for consideration of Finance Department. The budget for the same can be arranged from the available savings due to phasing away of magistracy etc.
- vii) The LR&RD Department may reconsider the adjustment of the employees of the Local Council Board, so as to find out whether any such employees have been adjusted against the regular Government posts funded from the Provincial Consolidated Fund.
- viii) For adjustment of regular Class-IV (BS 1- 4) Government Servant in surplus pool, Finance Department may consider conversion of fixed pay/ contract posts into regular.

2. It is requested that decisions taken during the meeting held on 4.8.2001 may kindly be implemented by all concerned in letter and spirit and compliance report be furnished accordingly.

(Authority; letter NO.SOR-I(S&GAD)1-200/98 (Vol.I), Dated 13th August, 2001)


Section Officer (Litigation)
Government of KP
Establishment Department

Clg
11/10/01