

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION PETITION NO. 716/2023

IN SERVICE APPEAL NO. 1227/2020

Shafqat Ullah	Petitioner
VERSUS	
Chief Secretary Khyber Pakhtunkhwa & others	Respondents

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Government of KP
Establishment Department



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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtukhwi Service Tribunal

IN SERVICE APPEAL NO. 1227/2020

Dated 2 - 1 - 2021

Shafqatullah,	Petitioner.	
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. Correct, the petitioners were adjusted in accordance with the existing Provincial Surplus Pool Policy, 2001 and its legislative intent (Annex-II).
- 4. 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. Hanifur-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 (Annex-I). The appeal under 12(2) has yet to be decided.
- 5. 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.
- 6. Correct
- 7. Correct
- 8. As already explained in detail in Para-5 above.
- 9. Irrelevant to cite in this particular case.
- **10.Correct,** however, the petitioners were 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.

11. No comments

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.

-(NADEEM ASLAM CHAUDHARY)

Chief Secretary, KHYBER PAKHTUNKHWA

(Respondent No. 01)

(SHAHIDULLAH)

Secretary,

ESTABLISHMENT DEPARTMENT,

(Respondent No. 02)

(AMER SULTAN TAREEN)

Secretary, Finance Department, (Respondent No. 03)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION PETITION NO. 716/2023

IN SERVICE APPEAL NO. 1227/2020

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.

DEPONENT

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

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10 2 JAN 2024



GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT

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. 716/2023 in S.A No. 1227/2020 Titled "Shafqat Ullah VS Govt. of Khyber Pakhtunkhwa & Others" on behalf of the undersigned.

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

SEĆRETARY, ESTABLISHMENT DEPARTMENT, (Respondent No. 02)

SECRETARY, FINANCE DEPARTMENT, (Respondent No. 03) BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

12(2) CFC Petition no 642/2022.

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Muhammad Sadiq s/o: Kiramat Shah E & Ad deptt
             Latif Ur Rahman s/o: Atiq ur Rahman CM Sectt
Asim Ali s/o: Asghar All Khan Higher education deptt
             Sald Shah s/o: Said Badshah Socail welfare deptt
            Nafees Ahmad s/o: Ghuinm Hafeez Finance deptt
Shakeel Hussain s/o: Abdur Rasheed Finance deptt
                                                                            Assistants
            Abdul Wall Khan s/o: Muslim Khan excise and taxation deptt
Mohib Ullah Khan s/o: Naqib Ullah governor Sectt
                                                                                                           Assisten
             Salfullah s/o: Abdul Dayan Finance deptt
   10.
             All Asghar s/o: Karam Dad Agriculture deptt
            Salahud Din s/o: Sor Gul MühamSenior Clerk PHE Dept Peshawar
Muhammad Zamir s/o: Mozafar Gul E & AD deptt
  13.
             Muhammad Awals SamiSenior Clerk Health Dept Peshawar
            Zaheen ullah s/o: Salf Ullah E & AD deptt Durier Clarke
Sultane Rome s/o: Zamilah E & AD deptt Accret
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            Sultane Rome s/o: Zarullah E & AD deptt ASS 13 buts
  16.
            Arif Shall s/o: Sadiq Shall Kp- culture and Tourism deptt
  18.
            Faynz Muhammad s/o; Rashan Khan sports deptt
  19.
            Noorul Amin s/o: Gul Khan Transport deptt
            Adnon Quraishi E & Ad deptt
  21,
            Aftab Ahmad s/o: Shah AlamST & IT deptt
  22,
            Abdul Hanan s/o: Alam ShaliSenior Clerk Social Welfare Dept Peshawa
            Muhammad Tariq Khan s/o: Mir Alam Jan Finance deptt
  23.
            Muhammad Farooq 2/0: Muhammad Anwar Governor Sectt
            Khan Muhammad s/o: Yar MuhammadSenior Clerk Food Dept Peshawar
  26.
            Nadeem Khan s/o: Muhammad Maroof Tinoli IPC deptt
  27,
            Muhammad Faliad Iqbai s/o: Muhammad Iqbal Awan PHE deptt
  28.
            Fahlm ur Rahman s/o: Latif Ur Rahman Mineral deptt
            Abbas aziz s/o; Aziz ur Rahman LGE &RD deptt
            Muhammad Imran Khan s/o: Jehanzalb Khan E & Ad Deptt
            Hammad Ahmad s/o: Shabir Ahmad Finance deptt
           Muhammad Ikram s/o: Jehnazaib PMRU on deputation basis
 33.
           Muhammad Tahir s/o: Fazai Raziq Finance deptt
            Abdul Hal slo: Khan Sher P & D deptt
 35.
           Muhammad Asif s/o: Muhammad Shah E & AD deptt
 36.
           Abdul Majld s/o: Hajl Ahmad Khan C &W deptt
 37.
           Usama Salman s/o: Intezar Baltht E & Ad deptt
 38.
           Muhammad Iqbal s/o: Ghulam Muhammad Environment deptt
 39.
           Zulfigar Ahmad s/o: Races Khan KP- PSRA
           Luqman Saeed s/o: Fazie Sneed CM Sectt
 40.
           Mehmood Saleem s/o: Qasim Khan Finance deptt
           Muhammad Abbas Khun s/o: Amin Khan C & W deptt
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 43.
           Bashir Khan s/o: Muhammad Yar E & SE deptt
 44.
           Sami Ullah IChan s/o: Ajmal IChan Home deptt
 45.
           All Abbas Khan Marwat s/o: Mir Abbas Khan Marwat Finance deptt
Tahir Khan s/o: Rashid Khan Relief deptt
           Muhammad Rahim s/o: Fazle Rahman E & Ad deptt
 47.
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           Muhammad Azam s/o: Muliammad Ayoob E & Ad deptt
                                                                                            are
 49.
           Janbaz Ahmad s/o: Mustajab KhanSenior Cierk Social PMS service Dept Peshawar
 50.
           Muliammad Tariq Rashid s/o: Abdul Rashid Senior Clerk Ghillyat Development Authoruty Dept
           Abbotabad
          Yahya Uliah s/o: Rahmat Dool E & AD deptt
Muhammad Naveed s/o: Khan Afsar STI- E & AD deptt
52.
          Tahir Javed s/o: Asghar Javed Agriculture deptt
Najeeb Ullah s/o: shams ul Qamar Baig P & D deptt
53.
54.
55.
          Owais Khan s/o: Habib ur Rahman Finance deptt
          Sojjad Muhammad Khan s/o: Muhammad Khan Finance deptt
          Naveed Hussain s/o: Ghulam HussinSenior Clerk in PMS Peshawar
          Zuifiqar Wall Klian s/o: Wali zar Khan Wali Law depit
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          Zubair Shah s/o: Mirkhajan E&AD deptt
                                                                                                           Section Officer (Litigition)
60.
          Sayyed Fawad Rashid s/o: Sayyed Haroon Rashid Law deptt
Mr Ikram Ullah s/o: Haji Saad Ullah E & AD deptt
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          Muhammad Shafiq s/o: Gul Rasoul Finance deptt
Tina Marry d/o: Akram Nadeem E & Ad deptt
Tehseen ullah s/o: Saad ullah Senior Clerk E&AD Dept Peshawar
                                                                                                           Establishment Department
          Niez muliammad s/o: Wazir Muhainmad C & W depit
Muhammad Shoaib Afridi s/o: Muhammad Yar Muhammad Industries depit
65.
66.
          Maroof Khan s/o: Fazsi Nabi E & AD deptt
          Qazi Muhammad Khalld s/o: Qazi Muhammad Farooq Housing deptt
         Muhammad Abubakar s/o: Muhammad Ajmal Khan Health deptt
Amjid Ali s/o: Jangi Khan Excise and taxation deptt
70.
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Zahld Khan s/o: Abdul Akbar LGE & RD deptt Islam Sher s/o: Hassan Sher E & SE deptt

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Usman Wall Khan s/ot Mas Wall Khan Directorate of sports
            Mulammad Ibrahim s/o: Hazrat Slinh E & SE deptt
            Salcem ullali Klinn s/o: Mir Alam Klinn Agriculture deptt
            Muhammad Awais s/o: Abdul Aziz Administration depit
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            Muhammad Sadique s/o: Innyat Ulinh Governor Sectt
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            Khan Muhammad s/o: Mughai Khan Transport section
  70
            Saild All Shah Senior Clerk Finance Dept PeshawarSenior Clerk Finance Dept Peshawar
  RA.
            Zaffar KhanSenior Clerk Agriculture Dept Pesinwar
            Muhammad Javed slo: Khuda BakhashSenior ClerkFinance Dept Peshawar
  81.
           Mr Shkil Khan sio: Muhammad HumayoonScalor Cierk Information Dept Peshawar
Haidar AliSenior Clerk Social Welfare Dept Peshawar
  82
  83.
            Yousaf Khan sio: Momin KhanSenior Clerk Industries Dept Peshawar
            Zoin KhanSenior Cierk E&SE Dept Peshawar
  86.
            Bahar ullah Senior Clerk E&SE Dept Peshawar
  87.
           Rahmat ullahSenior Clerk Higher Education Dept Peshawar
           Abid Munir Senior Clerk Irrigation Dept Pesliawar
Hidayat Ullah s/o: sahib Ullah Senior Clerk Finance Dept Peshawar
  88.
  89.
            Saldar Jamil Senior Clerk Excise & taxation Dept Peshawar
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            Wahab All Senior Clerk IPC Dept Peshawar
  92
           Rohmat UllaliSenior Clerk Sports Dept Peshawar
  93.
           Shaldl GhulamSenior Cleric PHE Dept Peshawar
           Riaz Muhammad s/o: Zar MuhammadSenior Clerk Finance Dept Peshawar
           Gul Zaib Senior Clerie Social Welfnre Dept Peshawar
  95.
           Jan NiszSenler Clerk E&AD Dept Peshawar
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           Shakir All Shah s/o: Aurangzaib ShahSenior Clerk P&D Dept Peshawar
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           Murtaza Ahmad s/o: Muhammad Shoalb Home deptt
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           Qismat Ali KhanSenior Clerk E&SE Dept Peshawar
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           Mehmi AbbasSenior Clerk Finance Dept Peshawar
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           Humayonn Klian Senior Clerk P&D Dept Peshawar
           Tajuddin Senior Clerk P&D Dept Peshawar
  102.
 103.
           Qalsar MehmoodSenior Clerk Mineral Dept Peshawar
           Melimood Ali Khan s/o: Qulandar KhanSenlor Clerk Labour Dept Peslin
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           Musawir ShahSenior Clerk Governor House Dept Peshawar
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           Yousaf All ShahSenlor Clerk Governor Secretariat Dept Peshawar
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           Rashid All Senior Clerk Local Govt Dept Peshawar
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           Muhammad All s/o: Liagat Ali Sentor Clerk Home Dept Peshawar
 109.
           Muliammad Jamil s/o: Bazurg ShahSenior Clerk HealthDept Peshawar
 110.
           Noman zalb s/o: AurangzaibSenior Clerk Industries Dept Peshawar.
 111.
           Salis Khan s/o: Diishahd KhanSenior Clerk E&AD Dept Peshawar
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           Dawood Aizal s/o: Tojul HaqSenlor Clerk PHE Dept Peshawar
 113.
           Lazim Shah s/o: qadeem ShahSenjor Clerk Irrigation Dept Peshawar
 114.
           Zahir Abbas s/o: tajul HaqSenior Clerk finance Dept Peshawar
           Sana Ullah s/o: Shams ur RahmanSenlor Clerk P&D Dept Peshawar
 115
          Qambar Shali s/o: Muhammad Shonib KhanSenlor Clork finance Dept Peshawar
Sajid Alimnd s/o: Fazle MalikSenior Clerk FinanceDept Peshawar
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 118.
           Muhammad Abbas s/o: Sher Azam KhanSenior Clerk P&D Dept Peshawar
           Amjid Ali s/o: Muhammad AliSenior Clerk CM Secretariat Dept Peshawar
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           Shafi Ullah s/o: Aman UllahSenior Clerk Finance Dept Peshawar
          Zalioor ud din s/o: Abdul GhafoorSenior Cierle E&AD Dept Peshawar
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 122.
          Ihsan ullah s/o: Muhammad Zahir Senior Clerk IPC Dept Peshawar
          Sultan younsa s/o: Gul Muhammad Senior Clerk E&SE Dept Peshawar
Nasir Khan s/o: Wasal KhanSenior Clerk E&AD Dept Peshawar
123.
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          Abdul Basit s/o: Pervair KhanSenior Clerk E&AD Dept Peshawar
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          Hidayat Ullah Khan s/o: Dost Muhammad KhanSenlor Clerk Finance Dept Peshaw
          Abdul Qadir Senior Clerk PHE Dept Peshawar
127.
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          Zarmash Khan sio: Wasli KhanSenior Clerk E&AD Dept Peshawar
129.
          Nasrat Khan s/o: Mirza KhanSenlor Clerk Governor House Dept Peshawar
          Surzamiń s/o: Gui DadSenior Cierk E&SE Dept Peshawar
Imdad Khan s/o: Zahir Ullah Senior Clerk C&WDept Peshawar
131.
          Shakil Khan s/o: Masam KhanSenior Clerk ST&ITDept Peshawar
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          Kher ul Amin s/o: Muhammad Rauf Senior Clerk Finance Dept Peshawar
134.
          Muhammad Tahir sio: Lingat HussninSenior Clerk E&AD Dent Peshawar
135.
          Rooh Ullah s/o: Zahir Ullah KhanSenior Clerk Finance Dept Peshawar
          Nasir Ahmad s/o: Muhammad Nazir Senior Clerk Health Dept Peshawar
          Yousaf All s/o: Alam SherSenior Clerk C&W Dept Peshawar ,
Muhammad Azam s/o: Muhammad Sarfaraz KhanSenior Clerk Energy & Power Dept Peshawar III. (Litigition)
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                                                                                                     Government of KP
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          Yousaf Khan s/o: Khalid KhanSenior Clerk E&AD Dept Peshawar
                                                                                                Establishment Denarment
141.
          Pazal Hussaln 1/0: Umar MuhammadSenlor Clerk Agriculture Dept Peshawar
         Gharib NawazSenior Clerk CM Sect Dept Peshawar
Ramdad All Senior Clerk E&AD Dept Peshawar
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         Arshid HabibSentor Clerk Home Dept Peshnwar
Raiz Balg s/o: Azam BnigSentor Clerk C&WDept Peshnwar
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         Abdul Qayoom Senior Clerk Higher Education Dept Peshawar.
Zeeshan Ali Shah s/o: Mucharat Shah Senior Clerk Augat Dept Dept Peshawa
146.
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         Ghulam HaiderSenior Clerk Enviroment Dept Peshawar
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         Fazal HalcemSenlor Glerk E&AD Dept Peshawar
Nadeem Khan s/of Rahlin Gul Senior Clerk Mineral Dept Peshawar
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149. 150.

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Kamran Khan Senior Clerk Irrigation Dept Peshawar Bilal Khan 2/0: Nasir Khan E & AD deptt

Muzamil Hussain Senior Clerk E&AD Dept Peshawar.

Klfayat UllahSenior Clerk Governor Sect Dept Peshawi Ibrar Hussain Schlor Clerk Finance Dept Peshawar

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Muhammad Salim Senior Clerk Finance Dept Peshawar
    156.
    157.
              Muhammad Sarfaroz All Senior Clerk Local Govt Dept Peshawar
    158.
              Rashid Minhas Senior Clerk E&SE Dept Peshawar
    159.
              Javed KhanSenior Clerk PHE Dept Peshawar
              Bacha Nacem s/o: Muhammad Nazir E & Ad deptt
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    161.
              Aslam Khans/o: wazir Khan Finance deptt
              Sajid Saced s/o: Abdul SacedSenior Clerk E&AD Dept Peshawar
    162.
             Kalsoom BibiSenior Clerk P&D Dept Peshawar

Kalsoom BibiSenior Clerk P&D Dept Peshawar

Syed Muzaffar Shahs/o: Syed Lal BadshahSenior Clerk Governor Sect Dept Peshawar

Asad Farooq s/o: Umar FarooqSenior Clerk PHE Dept Peshawar

Miss Sadia d/o: Amir BahadarSenior Clerk Governor Sect Dept Peshawar
    163.
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             Falak Niaz s/o: Muhammad ArshadSenior Clerk Law Dept Peshawar
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             Uznir Gui s/o: Shama ud DinSenior Clerk PHE Dept Peshawar
Muhammad Dawood Jan s/o: Muhammad IsrarSenior Clerk E&AD Dept Peshawar
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             Muhammad Adnanzaib s/o: Jehanzaib KhanSenior Clerk E&SE Dept Peshawar
   171.
             Shams ul Islam s/o: Safarish KhanSenior Clerk C&W Dept Peshawar
   172.
             Jawad Khan s/o: Naib KhanSenior Clerk Finance Dept Peshawar
             Taqdees Tahira d/o: Faizan Hussain
   173.
             Taqdees Tahira dio: Faizan Hussain
Hazrat Bilai sio: Musharraf KhanSenior Clerk Finance Dept Peshawar
   174.
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             Zahid Hassan s/o: Muhammad HassanSenior Clerk E&AD Dept Peshawar
   176.
             Fawad Hussain s/o: Faryad HussainSenior Clerk Finance Dept Peshawar
             Abbas Khattak s/o; Muhammad Majid Senior Clerk C&W Dept Peshawar
   178.
             Umair Khan s/o: Shakir UllahSenior Clerk Information Dept Peshawar
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             Muhammad Hamza s/o: Muliammad MukhtiarSenior Clerk E&AD Dent Peshawar
            Muhammad Sohail s/o: Bostan KhanSenior Clerk Finance Dept Peshawar
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            Summiya Imiliaz d/o: Muhammad ImiliazSenior Clerk PMRU Dept Peshawar
   181.
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             Hmaza Zahir Shah s/o: Zahir ShahSenior Clerk Finance Dept Peshawar
   183.
            Muhammad Nagash s/o: Muhammad RoshahSentor Clerk E&AD Dept Peshawar
   184.
            Muhammad Mumtaz Quraishi s/o: Muhammad Sawar Kha QuraishiSenior Clerk E&AD Dept
            Saced Lateef s/o: Abdul Lateef Senior Clerk ASR Dept Peshawar
            Saced Anwar sio: Anwar Khan Senior Clerk E&AD Dept Peshawar
   186.
            Baldar Ahmad Senior Clerk IPC Dept Peshawar
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   188.
            Shah Nawaz Khan s/o; Amir Nawaz E & AD deptt
                                                                     Funiar Clerk
  189.
            Fazii DayanSenior Clerk C&W Dept Peshawar
   190.
            Ijaz Iqbal Senior Clerk Law Dept Peshawar
            Imran KhanSenior Clerk Environment Dept Peshawar
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            Zarshad s/o: Irshad KhanSonior Clerk sports Dept Peshawar
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            Muhammad Abbas s/o; Muhammad ShoalbSentor Clerk energy & power Dept Peshawar
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            Mehmood ul HassanSenlor Clerk Agriculture Dept Peshawar
  195.
            Mohlbullah s/o Habibullah Senior Clerk PHE Dept Peshawar
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            Azhar Iqbal s/o: Iqbal AhmadSenior Clerk E&AD Dept Peshawar
            Farhan ManzoorSenior Clerk Law Dept Peshawar
  197.
            Sadar Nawaz Khan s/o; Muhammad NawnzSenior Clerk Finance Dept Peshawar
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            SaifuliahSenior Clerk Finance Dept Peshawar
  200.
            Muhammad AyazSenior Clerk C&W Dept Peshawar
            Wasebullah s/o: Fazal KarimSenlar Cierk KPSRA Dept Peshawar
  201.
  202.
            Naseebullah KhanSenior Clerk S&IT Dept Peshawar
  203.
            Wajahatuliah s/o: RefaqatuliahSenlor Clerk HOUSING Dept Peshawar
  204.
           Muhammad Rameez s/o; Muhammad SaddiqSenior Clerk E&AD Dept Peshawar
Ikram Ullah s/o; Jan GuiSenior Clerk E&AD Dept Peshawar
Abubakar Sadiq s/o; Muhammad NacemSenior Clerk E&AD Dept Peshawar
  205
  206
           Muhammad Fahad Awan s/o: Muhammad FaridSenior Clerk Relief Dept Peshawai
 207.
 208.
           Tayyab Gul s/o: Musharaf Gul Schlor Clerk E&SE Dept Peshawar
 209.
           Muhammad Umer s/o: Zar GulSenior Clerk state office Dept Peshawar,
           Junaid Asif s/o: muhammad AsifSenior Clerk C&W Dept Peshawar
Hamad Alam s/o: AlamgirSenior Clerk CM sectt Dept Peshawar
 210.
 211.
           Ibrar Hussain s/o: Muhammad IshaqSenior Clerk population welfare Dept Peshawar
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 213.
           Waseem Khan sio: Abdur RaufSenibr Clerk E&AD Dept Peshawar
 214.
           Muhammad Farhan s/o: raza KhanSenior Clerk Finance Dept Peshawar
 215.
           Snad All Shah s/o: Sayyed Zulligar All ShahSenlor Clerk PHE Dept Peshawar.
           Riaz AhmadSenior Clerk HIGHER EDUCATION Dept Peshnwa
           Sayeed Samin Shah s/o: sayyed Iraq ShahSenior Clerk HEALTH Dept Peshawai Luqman ShahSenior Clerk CM SECTT Dept Peshawar
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 218.
 219.
           Wall JanSenlor Clerk AGRICULTURE Dept Peshawar
          Rahmat Sher s/o: Zaman Sher Local govt deptt Junior Clerk
Atl Amin s/o: Saleem ur Rahman Housing deptt Junior Clerk
 220.
221.
          Said AminSenior Clerk IRRIGATION Dept Poshawar
Bashir Hussaln Senior Clerk
222.
          Bashir Hussaln Senior Clerk E&AD Dept Peshawar
223.
224.
          Shamshad KhanSenior Clerk FinaExcise and taxation Dept Peshawar
225.
          Halder ZamanSenior Clerk local govt Dept Peshawar
          Ameer Zada junald Muhammad Khan DuraniSenior Clerk Home Dept Peshawar Waheed Ullah s/o: Banat Khan Mineral Dev deptt Junior Clerk Wahammad AmirSenior Clerk Finance Dept Peshawar
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          Sikandar Khan s/o: Wakii KhanSenior Clerk E&SE Dept Peshawar
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          Hidayat ullah s/o: Aziz Ullah IPC deptt
          Malik Fnizan Nabi s/o: Malik Ghulam Nabi Senlor Clerk CM Sect Dept Peshawar
231.
232.
          Asif Nazir s/o: Raiz GuiSenior Clerk Health Dept Peshawar
233.
          Akhtar Naveed s/o: Arshid NaveedSenior Clerk CM Sect Dept Peshawar
          Ikram Ullah s/o: Murad KhanSenior Clerk E&AD Dept Peshawar
235.
          Amjid Hussain s/o: Hussain Gul Senior Clerk Home Dept Peshawar
         Abid Ali s/o: Amjid All governor House
Falzan Raza s/o: Imdad Hussain Industries deptt

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Section Officer (Litigition)
Government of KP
Establishment Department

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238.
              Qnyoom Kinn s/o: Taus Kinn Energy & Power deptt
              Muhaminad Junald s/o: Aman Ullah Khan Information deptt
Abdus Sami s/o: Fazle Qadeem Khan Labour deptt
    240.
    241.
              Yasin Klinn s/o: Aurangzaib Law deptt .
    242.
              Ata Ullalı s/o: Noor Mulammad Local govt depti
              Obaid Khan s/o: Bashir Khan Finance deptt
              Faynz Alimad s/o: Nasir Muhammad Law deptt
              Snyyed Waqas Ali Shah s/o: Snyyed Zulfiqar Ali Shah CM Sectt
Malik Adnan Khan s/o: Tila Muhammad CM Sectt
              Muhammad Ankif s/o: Muhammad Shah P & D deptt
    247.
    248.
              Noveed Khan s/o: Sher Zada P & D Deptt
    249.
              Muhammad Kashii Khan s/o: Muhammad Aurangzaib Finance deptt
    250.
             Muhammad Shahnb s/o: Races Khan E & Ad deptt
Muhammad Afzal s/o: Niaz Ali KP-PSRA
Muhammad Arif s/o: Ali Halder Local Govt
    252.
    253
              Anwar All Shah s/o: Shad Muhammad Local govt
              Kamil Khan s/o Zahir ur Rahman Higher education deptt
    254.
    255.
              Amir Schnil s/o: Fazle Qadir Energy & Power deptt
             Muhammad Jawad s/o: Sobat Khan P & D deptt
Sayyed Muhammad Bilal s/o: Muhammad Saleem Finance deptt
   257.
   258.
             Inanm ullah Khan s/o: Aman Ullah Khan PDMA
   259.
             Jawad Ali s/o: Fazal Rahim CM Sectt
   260.
             Rafi Ullah s/o: Muhammad Ullah Finance deptt
   261.
             Walld Alimad s/o: Nazir Ahmad Energy & Power deptt
   262.
             Sayyed Umar Saced slo: Sayyed Shaheen Shah Socall werfare deptt
             Zahid Ullah s/o: Abdul Mnnan P & D deptt
   263.
             Hassan Rahman s/o: Gul Sher E & AD deptt
   264.
   265.
             Gul Nawaz Khan Durani s/o: Tasicem Khan Durani P & D depit
             Muhammad Sheraz s/o: Muhammad Shafiq E & AD deptt
   266.
   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 Shoolb Ullah Shah s/o: Snyyed Masoom Slinh Finance deptt
   271.
            Rizwan Ullah s/o: Muhammad Isling Augnf deptt
   272.
            Safer Ullah Quraishi s/o: Sami Ullah Quraishi Finance deptt
   273.
            Muhammad Nacem s/o: Samand Khan E & SE deptt
  274.
            All Ahmad s/o: Afznl Aman IPC Deptt
            Arif Ullah s/o: Jan Muhammad Relief deptt
  275.
            Ances Alimad 2/0: Mulla Muhammad Mineral Dev deptt
Muhammad Shabir 2/0: Qalsar Khan PSA
  276.
  277.
  278.
            Muhammad Youngs s/o: Jumabad Finance deptt
  279.
            Noor Rahman s/o: Rustam Jan Relief depti
  280.
            Yasir Farid s/o: Farid Ulinh Energy & power deptt
  281.
            Vikash s/o: Omparakash Local deptt
  282.
            Imran Ullah's/o: Paiz Ullah CM Sectt
           Khilq ur Rahman s/o: Muhammad Ismail Finance deptt
Saqib Ali s/o: Sadiq Ali CM Secti
  283.
  284.
            Amjid Hussain s/o: Mirza Hussain E & AD deptt
  285.
            Fazle Mola s/o: Umarzada E & AD deptt
  286.
  287.
            Muhammad Ibrahim s/o: Fazai ur Rahman Socali werfare deptt
           Maqsood ur Rohman s/o: Fazal ur Rahman E & Ad deptt
  288.
  289.
           Abdul Malik s/o: Ameer Khan CM Sectt
  290.
           Muhammad Toqir Nasir s/o: Muhammad Fazii P & D deptt
Shafqat Ullah s/o: Fazal Hanan CM Sectt
 291.
 292,
           Jamni Ahmad s/o: Muhammad Raiz Qurnishi E & Ad dentt
 293.
           Muhammad wasim s/o: Habib ullah CBA branch
 294.
           Tahir Khan s/o: Awals Khan KP- PSRA
           Sadiq ullah s/o: Shakir Ullah E & AD deptt
Bismillah Jan s/o: Haji Waris Environment deptt
 296.
 297.
           Kamran ullalı s/o: Habib ullah PMRU dentt
 298.
           Irshad Ali Shah s/o: Ahmad Ali Shah Health deptt
 299.
           Mohib ullah 1/0: Kabir Khan Population werfare deptt
           Alsha Khas d/o: Arshid Iqbal C&W deptt
Ismall Khan s/o: Khaista Jan PSRA
 300.
 301.
           Abdussattar Khan s/o: Ahmad Gul Khan Finance deptt
Hamid ullah s/o: Bakhti Gul CM Sectt
 302.
 303.
304.
           Umar Rahman s/o: Khaista Rahman Finance deptt
305.
           IJaz Ahmad s/o: Gul Shahzada PSRA
          Muhammad Haris s/o: Abdul Rauf Irrigation deptt
          Ishfaq Ahmad s/o: Rahmat Khan Governor Sectt
Muhammad Qasim Khan s/o: Muhammad Salim Floance deptt
307.
308.
309.
          Tehseen Javid s/o: Ghulam Muhammad STI- E& AD deptt
310.
          Muhammad Farooq Khan s/o: Karim Khan Labour deptt
311.
          Falzan Nazar s/o: Nazar Muhammad Pinance depit
         Muhammad Arshad Khan s/o: Salim Khan P & D deptt
Adnan Adil s/o: Mushtng Ali IPC deptt
          Majid Iqbni s/o: Nosherwan R-I section E &AD deptt
         Muhammad Zeeshan s/o: Jehangir Khan Housing deptt
315.
          Zeeshan Ahmad s/o: Muhammad Pervaiz Quraishi CM sectt
          Wajnhat ul Mujahid s/o: Mir Akbar Shah Finance deptt
         Abdul Basir s/o: Khan Afsar Finance depti
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Shahzaib Khan Jadoon s/o: Jehanzaib Khan Housing deptt

Meliboob ur Rahman s/o: Khalid Khan CM sectt

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Section Officer (Litigation)
Government of M.C. Establishment Desagniell

Aldb Javed s/o: Mallk Amnn E &AD deptt Waqas Jan s/o: Arshad Jan E & AD deptt Wasim uliah Khan s/o: Nasruliah Khan CM secti 324. Haji Akbar s/o: Hussoln Akbar Information deptt 325. Shahzad Afsar s/o: Khan Afsar Mineral depit Awais ur Rahman s/o: Razi ur Rahman Higher education deptt 326. 327. Asif Ali s/o: Qamnr 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 Husşain E& AD depit 331. Sajid Hussain s/o: Naik Nazir Higher education deptt Muhammad Nadeem s/o: Muhammad Shabir E & AD deptt 332. 333. Muhammad Afzal Khan s/o: Muhammad Ismail E & AD deptt 334: 335. Janas Khan s/o: Meer Hassan Shah E & AD depti Shahzaib Khan s/o: Faiz Ullah Finance deptt 336. Mukhtiar Khan s/o: Bakhtlar Khan Finance deptt 337. Awais Khan s/o: Ameer Nawaz E & AD deptt 338. Roohul Amin s/o: Nosher Khan Industries deptt 339. Afzal Hassan s/o: Muhammad Hassan CM sectt 340. Khalld Mehmood Higher education deptt 341. Teliseen Ali Klinn s/o: Shokat Ali Mineral deptt 342. Sayyed Akbar.s/o: Akhtar Zaib E & AD deptt 343. Muhammad Afzal Abbas s/o: Mian Faqir Gul Finance deptt 344. Sayyed Tofail Shah s/o: Sayyed Mubarok Shah Socail werfare deptt 345 Muqaddar Shah s/o: Maqbool Shah Higher education deptt 346 Azaz Alimahd s/o: Rinz Ahmad PSRA 347. Akmal Hassan s/o: Ghulam Hassan E & AD deptt 348. Surject d/o: Sunli Singh ST &IT deptt Fazal Rabani s/o: Masal Khan E & AD deptt 349. Zis ur Rahman s/o: Shukur Rahman Finance deptt 351 Muhammad Qasim s/o: Muhammad Younas E & AD deptt 352 Muhammad Hammad Iqbal s/o: Muhammad Iqbal Finance deptt 353 Igra Races d/o: Races Ahmad IT, HRD Wing 354. Abdul Majid Khan s/o: Sultan Zaib P & D deptt 355. Muhammad Tayyab s/o: Nisar Muhammad E & AD deptt Muhammad Waheed s/o: Muhammad Saced Food deptt 356. 357. Abdul Baseer s/o: Abdul Hakim Sports deptt 358. Sifat Ullah s/o: Warls Khan IPC deptt 359, Jahangir Klian s/o: Ashraf Hussain Industries depti 360. Ihtisham ul Haq s/o: Shahin ShahE & AD deptt 361. Fayaz Ahmad s/o: Gul Nabl Finance deptt 362. Nacem Shah s/o: Salf ur shah Agriculture deptt 363. Ahmad Saleem s/o: Muhammad Saleem E & SE deptt 364. Rizwan Mehmood s/o: Muhnmmnd HanifState Office Ismail s/o: Liaqat Ali Local govt deptt 365 366. Ahmad Mustafa s/o: Muhammad Nawaz Directorate of Aviation 367. Jawad Khan s/o: Khurshid Ali E & AD deptt 368. Amir Khan s/o: Mehraban ShahE & AD deptt 369. Fahad s/o: Insanullah Governor House 370. Hammad. Ullah Khan s/o: Najibuliah Khan Social werfare depti 371. Kashif Ayaz s/o: Muhammad Ayaz E & AD deptt Kanchal Sumair d/o: Samir Chohan Local govt 372. 373. Umar Zeb s/o: Muhammad Aurangzaib CM sectt Sayed Walid Ullah Shah s/o: Syed Hameed Ullah ShahE & SE deptt 374. 375. Haseeb Ullah s/o: Sardar Muhammad Information deptt 376. Muhammad Bilal s/o: Muhammad Parooq finance deptt 377. Ziyad Ahmad s/o: Ahmad Ali Governor House Zio ur Rahman s/o: Zafar Igbal Augaf deptt 378. 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 Sohalb ul Hadi s/o: Abdul Hadi E-I section 383. 384. Tolmoor Khan s/o: Sharbat Khan Energy & power deptt 385. Tayyab Jehangir s/o: Jehangir Alimad Law deptt 386. Osama Farooq s/o: Muhammad Farooq Finance deptt Muhammd Bilal s/o: Muhammad Jehangir Khan PHE deptt Zain ul Abbidin s/o: Mukarram CM sectt 387. 388. 389. Muhammad Farman s/o: Munsif Khan Finance deptt 390. Dost Muhammad s/o: Butcht Baldar Mineral Dev deptt 391. Imran Khan s/o: Muhammad Irfan Transport dehtt 392. Iqbai Hussain s/o: Muhammad Hussain E & SE deptt 393. Muhammad Arshad Khan s/o: Hamld Khan Mineral Dev deptt 394. Khuram Shehzad s/o: Muhammad Zaman Local govt deptt 395. Farooq Khan s/o: Abdul Malik finance deptt Fayaz Alimad Khan s/o: Mian Muhammad Local govt deptt 396. Sartaj Ali Khan s/o: Zafar Ali Khan Law deptt 397. 398. Imdad Ali s/o: Noor Karim E & AD deptt

Sneed Ahmad s/o Nazir alımıd Irrigation deptt

Munsif All s/o: Wahld Jamal Law deptt

Rahat Gul s/o: Khan Por Law deptt

Siraj khan s/o: Afridi Khan E & AD deptt Rehman Uddin s/o: Sano ud Din Housing deptt

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401.

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Litiait on)

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Akhtar Hussain s/oi Muntaj Klina Finance deptt
              Muhammad Adnan Khan s/o: Noor Afzal Finance deptt
Irshad Ullah s/o: Insan Ullah Finance deptt
     406.
              Muhammad s/o: Saced Ulinh Local govt deptt
Muhammad Ibrahim s/o: Saida Jan Law deptt
Imdad Uliah Governor sectt
     407.
     408.
     409.
              Kalimuliah Jan s/o: All Jan CM Sectt
     410.
     411.
              Salim Ghulam s/a: Ghulam Masih Law deptt
              Nawaz Khan s/o: Wakii Khan Energy & Power deptt
     412
     413.
              Fazie Wajid s/o: Israil Khan E & AD deptt
              Muhammad Umair s/o: Hafiz Muhammad Salman Home deptt
              Ghulam Muhammad slo: Haji Icher Muhammad Home deptt
    415
              Haseeb ur Rahman s/o: Snyyed Ata ur Rahman Higher education deptt
    416.
    417
              Muhammad Arsliad Anwar s/o: Anwar Khan E & AD deptt
    418.
              Arshad Khan s/o: Shamroz Khan E & AD depti
             Mubashir Hassan Health depit
    419.
    420.
             Roohul amin E & SE deptt
             Fazat Gul s/o: Samar Gul energy & power deptt
    421.
    422.
             Slinbir Khan s/o: Rooldar Khan P&D deptt
    423.
             Jan Alam s/o: Sher Afzal Home deptt
    424.
             Abdullah Jan s/o: Nascer ul Hag Law deptt
             Rizwan Ahmad s/o: Badhor Khan Local govt deptt
    425.
    426.
             Wasim ullah s/o: Khurshid Ali Khan Relief deptt
             Nawab All s/o: Raza Kha energy & power deptt
    427.
    428.
             Hassan Gul slo Taj Gul Food deptt
    429
             Sayyed Ibrahim Shah KP-PSRA
    43Ó.
             Muhammad Faheem s/o: Hanif Shah afridi E & SE deptt
    431.
             Muhammad Ishfaq s/o: Abdur Razzaq Khan Finance depti
    432.
             Shah Nawaz s/o: Usman Jan Relief deptt
            Muhammad Molisin Khan s/o Abdul Latift & AD deptt
   433.
   434.
            Muhammad Arif s/o: Roshan Khan E & AD deptt
            Sayyed Ayaz Hussain Shah s/o: Sayyed Imtiaz Hussain Shah Finance deptt
   435.
            Falz ur Rnimen s/o: Abdur Rashid energy & power deptt
   436.
            Innyat ur Rahman s/o: Noor Ul HadiE & SE deptt
   437.
   438.
            Qaim Khan s/o: Zaibar KhanE & AD deptt
   439.
            Fazle Amin s/o: Madad Klinn Higher education deptt
   440.
            Gul Faraz s/o: Gul baz Irrigation deptt
   441.
            Almal s/o: Malrajuddin Labour deptt
  442,
            Multammad Arif s/or Sher zaman E & AD deptt
  443.
            Saft 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 Zulfigar s/o: Zulfigar Ahmad Transport deptt
  447.
            Sana ullah s/o: Snad Ullah Finance deptt
  448.
            Iqbal s/o: Lal Muhammad ST &IT
            Asif Khan s/o: Ayoob KhanE & SE deptt
Kifayat ullah s/o: Naima't ullah CM Sectt
  449.
  450.
  451.
            Sayyed Azhar Zaidi s/o: Sayyed Danish Raza Housing depit
  452
           Hazrat Ali Finance depit
  453.
           Rinz Khan s/o: Darya khan Socall welfare depti
  454.
           Muhammad Imran s/o: Habib ur RahmanE & AD deptt
           Fida Muhammad Labour deptt
           Hassan Ali Environment deptt
           Imran Ali s/o: Nigah Hussain Agriculture deptt
  457
  458.
           Umar Faraz s/o: Sarfarez Khan Finance deptt
  459.
           Muhammad Irfan s/o; Mahboob ur Rahman CM secti
           Zubair Ahmad s/o: syed Umnr Finance deptt
          Shahjehan s/o: Faqir Muhammad Finance deptt
Ashfaq Ahmad s/o: Khalsta Rahman STI, E & AD deptt
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 462.
          Muhammad Ashraf s/o: Abdul Samad E & AD deptt
 463.
 464
          Salcem Khan s/o: Farooq Shah Augaf depti
 465.
          Bakhtzada s/o: Gulzada E & AD depit
 466.
          Roman Khan s/o: Samin Jan Higher education deptt
          Malang Jan s/o: Nisar Ahmad Finance deptt
 467.
 468
          Zakir ullah Governor Sectt
 469.
          Noman Ijaz s/o; Ijaz Ahmad Sports deptt
 470.
          Ancel Anwar s/o: Anwar Augaf deptt
 471.
          Sajid Khan s/o: Nalmat Ullah CM Sectt
Nacem ullah s/o: Gul Hassan R-V section
472.
473.
          Muhammad Rizwan s/o: Muhammad Riaz E & SE deptt
474.
          Amir Khan s/o: Gul Rahman Excise and taxation deptt
          Shaldl Ahmad s/o: Sher Ahmad C & W deptt
476.
          Salfad Ahmad s/o: Asif khan Irrigation deptt
477.
          Sajid Khan s/o: sanab Gul Local deptt
          Bakhtbiland s/o: Hazrat Hussain Law deptt
478.
479.
         Gulfam ulinh s/o: Bashir Muhammad Health deptt
480.
         Sadar Islam slo: Muhammad Sultan Khan Health deptt
481.
         Ineam ullah s/o Ahmad Klian Administration deptt
482.
         Shah Hassan s/o: Faqir Muhammad Law deptt
         Nacem Abbas s/o: Qadir Bakhsh E & AD deptt
         Sallad All s/o Noor Karim Finance deptt
484.
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Asif Shabir s/o Malik Muhammad Sadiq Transport deptt

Arshad Alim s/o; Alam Kinn Population deptt

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Section Officer (L)Hgfflon Government of KP Establishment Department

Establishment Department

```
Aziz Khan s/oi Sultan Khan PitE deptt
                Fahlm Khan s/o: Naseem Khan Home depit
Amjid Hussain s/o: Mehr Muhammad energy and power depit
      488.
      489.
                Ikram Khan s/o: Alam Sher E & AD deptt
Asfand Yar Khan s/o: Mujahid Khan Sports deptt
Muhammad Rafi s/o: Muhammad Sadiq Khan Health deptt
      490.
      491.
      492.
               Sherin Khan Finance deptt
      493
                Rooh ullah s/o: inaynt Ullah Excise and faxation deptt
      494
               Muhammad Tayyab Shokat s/o: Shokat Pervez E & AD deptt
      495.
               Shahid Rinz s/o: rinz Ahmad IPC deptt
Adil Babar s/o: Saleem Javed Babar E & AD deptt
      496.
      497.
               Zarwali Kha s/o: Raj Wali Khan Finance deptt
Sifat Ulinh s/o: Awai Khan E & AD deptt
      498.
     499.
     500.
               Luqman Khan s/o: Mukhtiar Khan Higher education deptt
     501.
               Gul Zamin Khan s/o: Gul Zarin Pinance deptt
     502.
               Yousaf Klian s/o: Nazar Muhammad Finance deptt
     503.
               Bahadar Khan s/o: Sneed Khan P & D deptt
               Imran Khan s/o: muhammad Ashraf Khan Home deptt
     504.
     505.
               Nadir Khan Health deptt
               Muliammad Zubair s/o: Unab PHE deptt
     506.
     507.
               Jawad Tanwir s/o: Tanveer Ahmad Finance deptt
     508.
               Kachkol Shah s/o: Mukamil Shah PHE deptt
               Ramzon Hussein s/o: Gul Zarin PHE deptt
     509.
              Abdul Shukoor s/o: Dolat Khan Finnnce deptt
    510.
    511.
              Muhammad Sajid s/o: M. Zafar
    512.
              Wahab Ali s/o: Mukhtar Ali Agriculture deptt
    513.
              Muhammad Abbas Khan Higher education deptt
    514.
              Shahinisal Jan s/o: Ihsan Ullah Administration deptt
    515.
              Noor Khan s/o: Gulab Sher PHE deptt
              Sharafat All s/o: Muhammad Hanif Excise and taxation deptt
    516.
    517.
              Rawalz Khan s/o: Sher amin Mineral Dev deptt
              Muhammad Ihsan Jawad s/o: Fazal Dad Khan E & AD deptt
    518.
              Afaq Ahmad s/o: Imtinz Khan E & AD depit
    519.
             Falsal Zulfigar s/o Zulfigar Ahmad E & AD deptt
Liagat Khan s/o: Sardar Khan C & W deptt
    520.
    $21.
             Israll Khan s/o: Ibrahim Khan Mineral deptt
    522.
    523.
             Sascom Hussain s/o: Bashir Ahmad P & D deptt
   524.
             Muhammad Anocs s/o: Muhammad Yasin Governor House
                                                                                                            Funiar Clerks (160-to-525)
             Ajwad Ali s/ot Muqaddas Ali (All are Junior cierks) Law dept
Roza Amin s/ot Mira Khan Assistant E & AD Dept Peshawar
    525.
    526.
    527.
             Snyyed Salumat ShahSuperintendent E&SE Dept Peshawar
   528.
             Lal Zahir Superintendent agriculture Dept Peshawar
   529.
             Amna Khan d/o: Abdul Rashid KhanSuperintendent C&W Dept Peshawar
   530.
             Jafar Khan Superintendent Home Dept Peshawar
   531.
             Muhammad Imtiaz s/o: Zar KhanSuperintendent Sport Dept Peshawar
             Abdus Samad Khan s/o: Abdur RahmanSuperintendent finance Dept Peshawar
Zeeshan Superintendent C&wDept Peshawar
   532
   533.
             Muhammad Wejahat Superintendent E&AD Dept Peshnwar
  534.
   535.
             Raza Ali BangashSuperintendent Health Dept Peshawar
            Muhammad Ammar Superintendent Relief Dept Peshawar
Muhammad AsadSuperintendent E&AD Dept Peshawar
   536.
  538
            Furgan ud DinSuperintendent E&AD Dept Peshawar
            Zia ur Rohman s/o: Quzi Muhammad NabiSuperintendent Finance Dept Peshawar
Abdul Salam s/o: Muhammad IbrahimPMS BS-17 in service quota. ASSIST
  539.
  540. /
  541.
            Jamshed Alam Khan s/o: Muhammad Nawaz Khan
            Mudassar Khan s/o: Mushtaq Ahmad Assistant Law Deptt Peshawar
            Abld Ahmad s/o: Muhammad MobinSuperintendent IPC Dept Peshawar
  543.
  544.
            Akhtar Rasool s/o: Daud
  545.
            Muhammad Hassan Shah s/o: Aftar All Shah PMS.BS-17 in service quota
            Muhammad Ilyas s/o: Muzaffar HussainPMS BS-17 in service quota
  546.
  547.
            Nizom ud Din Khan s/o: Muhammad Amin
            Issa Muhammad Khan s/o: Nawab KhanPMS BS-17 in service quota
  548
            Mehtab Ali Khan s/o: Muhammad Ashraf Khan
  549.
           Muhammad Waseem Sajjad s/o: Sajjad Ali Khan
Abdul Aziz s/o: Abdul KarimPMS BS-17 in service quota
  550.
 551.
           Nusrat bibi d/o: Amin SahabiPMS BS-17 in service quota
           Abrar All Shah s/o: Barkat ShahPMS BS-17 in service quota
 553.
            Azim Ullah s/o: Taj MalookPMS BS-17 in service quota
 554.
                                                                                                Assistents (544-to-556)
 555.
           Munech Ahmad s/o: Muhammad Hanif
 556.
           Adil Rahim s/o: Abdur RahimPMS BS-17 in service quota Alf
                                                                                      aye
           WasimUllah Wazir Superintendent C&W Dept Peshawar
 558.
           Imran Anwar Superintendent CM secretrait Dept Peshawa
           Zeeshan Khan s/o: Badshah Khan Superintendent Finance Dept Peshawar
 559.
           Alamgir Khan Superintendent Governor Secretariat Dept Peshawat
Umar AyazSuperintendentHome Dept Peshawar
560.
561.
562.
          Ikram Ullah SuperintendentIndustries Dept Peshawar
563,
          Ijaz KhanSuperintendent Local Govt Dept Peshawar
564.
565.
          Fazii AalaSuperintendent Aufaq Dept Peshawar
          Ijnz Hussain Superintendent S&SE Dept Peshawar
         Fazie NacemSuperintendent ST&IT Dept Peshawar
JohanzebSuperintendent Agriculture Dept Peshawar
Raz Muhammad Spperintendent Home Dept Peshawar
Raz Muhammad Superintendent Home Dept Peshawar
566.
                                                                                                                 Section Officer (Litigitian)
                                                                                                                        Government of KP
568.
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Iqbal Khan Superintendent Higher ducation Dept Peshawar
               Mushtaq KhanSuperintendent Excise Dept Peshawar
Basharat Rasool Superintendent PHE Dept Peshawar
      572.
      573.
               Nawab All Finance Deptt
              Nawab Ali Finance Deptt

Muhammad Ighai s/o: Muhammad Ashiq

Sher Azad Khan Superintendent PRMU Dept Peshawar
     574.
     576.
               Azam Khan Superintendent Local Govt Dept Peshawar
               Ghulamullah Superintendent Agriculture Dept Peshawa
     577.
              Imtiaz Ali s/o: Mumtaz AliSuperintendent Law Dept Peshawar
     578.
     579.
              MazullahSuperintendent Higher Education Dept Peshawar
     580.
              Jamshed KhanSuperintendent Higher Education Dept Peshawar
     581:
              Shah Badshah Superintendent Finance Dept Peshawar
    582.
              Niamat AliSuperintendent C&W Dept Peshawar
              Abdullali s/o: Matiur RahmanSuperintendent Home Dept Peshawar
    583.
    584.
              Aurangzeb s/o: IChan Sahib law deptt,
                                                            A SSTSTAUT
    585.
              Ral wallSuperintendent Housing Dept Peshawar
    586.
              Zaldr Hussain Superintendent Mineral Dept Peshawar
              Ilnz Ahmad Superintendent Excise Dept Peshawar
             Inayat ur Rahman s/o: Said RehmanSuperintendent Pinance Dept PeshawarNoorullah Jan s/o:
    588.
             Amir Nawaz Klinn LGE & RD Deptt
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             Saceda BanoSuperintendent E&AD Dept Peshawar
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             Dastar Ali Superintendent C&W Dept Peshawar
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             Safi Ullah Superintendent Labour Dept Peshawar
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             Raizullah Superintendent Irrigation Dept Peshawar
             Muhammad Iqbal s/o: Noor MuhammadSuperintendent InformationDept Peshawar
    593.
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             Noor un Nabi s/o: Sald NabiSuperintendent Finance Dept Peshawar
             Irfanullah s/o: Roghan ShahSuperintendent Food Dept Peshawar
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    596.
             Shuja ud Din s/o: Azim Khan Finance Deptt
                                                                  Assistant
    597.
             Lai Hussein Superintendent P&D Dept Peshawar
             Muhammad Ayaz Khan s/o: Afridi khanSuperintendent Benovelent Fund Dept Peshawar
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             Kashif Superintendent Health Dept Peshawar
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             FarlianullahSuperintendent E&A Dept Peshawar
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            Kilayat Aziz KhanSuperintendent CM Secretariot Dept Peshawar
   602.
            Muhammad Ahmad Superintendent Finance Dept Peshawar
            Muhammad Arshad Khan s/o: Muhammad Jamil Superintendent Home Dept Peshawar
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            Muliamamd Rafiq KlinnSuperintendent Finance Dept Peshawar
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            Alchtar Gul s/o: Sher Muhammad Superintendent E&SE Dept Peshawar
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            Abdur Rasiild Superintendent Finance Dept Peshawar
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            Muliammed Asim SiddiqueSuperintendent Local Govt Dept Peshawar
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            Shaukat Hussaln Superintendent Finance Dept Peshawar
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            Fazal SubhanSuperintendent Home Dept Peshawar
            Imtiaz Ahmad s/o: Waqif KhanSuperintendent Agriculture Dept Peshawar
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            Hasiz Muhammad KhalidSuperintendent Pinance Dept Peshawar
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            Ashrof Klian s/o: Amir RahmonSuperintendent CM sectDept Peshawar
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            Syed Masood ShahSuper!ntendentE&AD Dept Peshawar
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            Syed Qalsar All Sheh Superintendent Energy & Power Dept Peshawar
            Wasim ur RahmanSuperintendent Finance Dept Peshawar
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           Rahmanullah s/o: Hamid Home depti
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           Nayab Altaf d/o: Altaf Finance deptt
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           Hamid Shah s/o: Sultan Shah E & AD Deptt
  619.
           Zahid Hussain s/o: Ali Muhammad Finance depti
  б20.
           Abdur Rahman s/o: Falk ur Rahman P & D Deptt
  621.
           Afzal Khan s/o: Zarghou Shah E & SE Deptt
          Masaud Khan s/o: Said Afzal E & AD, HRD-I Section
Muhammad Irshad Khan s/o: Muhammad Roshan P & D deptt
Hamayoun Mustafa

Man Muhammad Tariq s/o: Muhammad Naseem Social welfare deptt
  622.
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           Yousaf Khan s/o: Mamrez Khan Higher education deptt
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           Muhammad Ashraf Khan s/o: Muhammad Zar Khan E & AD deptt
           Noor Begum d/o: Anwar Khan Mineral Dev depti
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           Haider Ali s/o: Mumtaz Kiian E & ADideptt
          Muhammad Sahir s/o: Muhammad Akram Ministry of Federal for education and professional
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          Asmat Ullalı Klıan s/o: Taza G il Transport deptt
Imtiaz Khan s/o: Abdul Wahid Energy & power deptt
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          Muhammad Javed Akhtar s/o: Khuda Baichsh E & AD deptt
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          Muhammad Jehangir Rahman s/6: Nabi ur Rahman Environment deptt
          Amjad Ali s/o: Nawab Shah E & AD deptt
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          Shumalia d/o: Muhammad Afzai Home deptt
          Fahim Ullah s/o: Bilawar Khan Informetion deptt
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          Raza Khan s/o: Bacha Khan Finance Deptt
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          Naveed Alam s/o: Fazle Sattar Mineral Dev Deptt
         Mazhar ul Islam s/o: Muhammad Younas Maiak Health Deptt
Muhammad zaheer s/o: Muhammad Bashir Quraishi Housing deptt
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          khan Zaman s/o: Sher Bandi Khan Heusing deptt
         Gul Nawaz s/o: Sharif Gul Housing deptt
Zunaira Rashid d/o: Abdul Rashid E & AD
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         Qasim Ali Awan s/o: Sabbir Ahmad Awan mineral Dev deptt
         Farmanuliah s/o: Tasleem Khan Home deptt
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         Syed Mansoor Ahmad s/ot syed Badshah Gul Agriculture deptt
aziz ur Rahman s/o; Abdur Rehman Mineral Dev deptt
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Nisar Ahmad s/o: Abdulinh Irrigation deptt

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SyedWisni Ali shah s/o: Syed Jamai shah Health deptt

Innyat ur Rahmna s/o: Mir Rahman Finance deptt Qalser Khan s/o: nawab Khan Home deptt

Naheed Gul s/o: Sardar gul E & Ad deptt Zhullah s/o: Abdul Aziz Mineral deptt

Section Officer (Litigition) Government of MP Establishment Department

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Mumtaz Ali shah s/o: Amir shah E & Ad deptt
              Snijad Ali sE & Ad deptt /o: Abdul Waliab
    735.
              Parvez Khan s/o: Ghani ur Rahman STI- E & Ad deptt
    736.
             Hameed Khan S/O: Kachkol Khan CM Sectt
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              Abdul Altbar s/o: Rafiq Gul finance deptt
              Lingat Ali Khan Qalandar Khan E & Ad deptt
    739.
             Arif Hussnin Shah s/o: Syed Godl Hussain shah CM Sectt
             Zafar ullah s/o: Ikram Ullah Health deptt
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             Fayyaz Hussain s/o: Mumtaz Klian Finance depti
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             Raza Muhammad s/o: Din Muhammad E & Ad deptt
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             Asad Mehmood s/o: Hassan Mehmood Excise & Taxation deptt
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             Ayat ullah s/o; Faiz ur Rahman E & Ad deptt
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             Hammad Saleem Khan s/o: Muhammad Salcem Khan Irrigation deptt
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             Mahmood Ullah s/o:Noor Zali Khan CM Sectt
   747.
             Naseeb Khan s/o: Lal Jan P &D deptt
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             Syed Asif Nawaz s/o: Syed Amir Nawaz CM Sectt
   749.
             Riaz ul Haq s/o: Fazal e Akbar Food deptt
   750.
             Ijaz Khan s/o: Bahadar Sher LGE & RD deptt
            Sakhawat Ali Shali s/o: Ahmad Shali Home deptt
Farman Ali s/o: Abdul Raziq Finance deptt
   751.
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             Syed Sarwer Shah s/o: Syed Feroz shah finance deptt
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             Syed Yousef All Shah s/o: syed Akbar shah E & Ad deptt
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            Zarshald s/o: Guishnid Khan higher education deptt
            Haider Khan s/o: Muhammad Ibrahim EHE deptt
Muhammad Riaz s/o: Khushni Khan finance deptt
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            Muhammad Walid s/o: Khan Muhammad Agriculture deptt
Wasi Ahmad s/o: Nazir Ahmad Energy and power deptt
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            Falzanulinii s/or Muhammad Zaheer LGE AND RD deptt
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            Hameed Ullah s/o: Falzullah E & SE deptt
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            Muhammad Naveed Toriq s/o: Muhammad Tariq P & D deptt
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            Muliammad Adeel s/o: Rahat shah Environment deptt
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            Hasham Ali Khan s/o: Sold Wali Khan Irrigotion deptt
  765.
            Hazrat Ullah s/o: H. Qoowat Khan Governor house
            Muhammad Fayaz s/o M. Sarwar E & SE deptt
           Gul Hassan s/o: Taws Khan LGE & RD deptt
Muhammind Tahseen s/o; M. Maskeen E & Ad deptt-
Muhammad Adnan s/o: M. Younas Finance deptt
  767.
           Hazrat Bilni s/o: raj Wall shah Administration deptt
  771.
           Sulaiman Shah s/o: Mailk Amnn E & AD deptt .
  772.
           Muhammad Younas s/o: Mir Khan Shah Higher education depte
  773.
           Faisal Sarwar s/o; M. Sarwar Environment deptt
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           Zahir Shah s/o: Abdul Aziz higher education deptt
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           Aftab Ahmad s/o: Irshad Gul E &SE deptt
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           Muhammad Sabir s/o: Abdul Rehman Governor House
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           Bakhtiar Khan s/o: Sanober Khan governor house
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           Inaynt ur Rahman s/o: Saif ur Rahman Higher education deptt
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           Zartaj Wali s/o; sald wali khan CM Secti
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           Imran Ahmad s/o: Muhammad Afzal E & SE deptt
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           Said Karam s/o: Saced ullah Khan Industries deptt
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           Abdul Basit s/o: Kiramat Shah ST & IT deptt
          Anwar ul Habib s/o Rehmat Gui sports deptt
Sherdii khan s/o Solibat Khan social welfare deptt
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           Beenish d/o: Abdul Qadeer Finance deptt
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           Zabeehuliah s/o: Noor Rehman Law deptt
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           Zeeshan Farukh s/o: Mian Muhammad CM Secti
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          Imrnn s/o: Afzal Finance deptt
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           Abbas Jan s/o: Ashraf ud Din E & SE depti
          Farhad Khan s/o: Gui Zaman E & AD deptt
Narcsh Lat s/o: Hameed Lai Bhatti E & AD deptt
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          Altaf Hussaiu s/o: Masal Khan Energy & power deptt
Muhammad Bilal s/o: Muhammad Wali P & D deptt
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          Anmir Salim s/o: Khurshid ur Rehman CM Sectt
          Faheema d/o: Arsala Khan Finance deptt
Wajeeha Younas d/o: Muhammad Younas Awan Finance deptt
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          Usman Ali s/o: Sakhi Rahman LGE & RD deptt
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          Noor Elalif s/o Muhammad Shafi transport deptt
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          Zar Ali s/o: Abdul Samad Khan PHE depti
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          Irfan Ullah s/o: Akhtar Shali Law deptt
801.
          Aurangzeb s/o: Fazal ur Rahman E & AD deptt
802.
          Maqsood Alimad's/o: Mohammad Iqbal E & SE deptt
Waqas Muhammad s/o: Muhammad Ullah KP-PSRA
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          Ahamd All Shah s/o: Mehrban Shah Finance depit
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          Farrukh Sair s/o: Farid Khan Relief deptt
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          Zaheer ud Din s/o: Zahir Khan E & AD deptt
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          Muhammad Javed s/o: E & SE deptt
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          Imran Khan s/o: Nasir Khan Irrigation deptt
          Imran Ullah s/o: Muhammad Khan Finance deptt
Iftikhar All s/o; Fazat Qadir Higher education deptt
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          Assad Ullalı Khan s/o; Muhammad Iqbal E & D deptt
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          Masood Khan s/o: Rana Khan Finance depit
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          Ashiq Hussain s/o: Abdullah Jan E & Ad deptt
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          Mushammad Asad Sohnil s/o: M. Aslam Labour deptt
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Farhan Baber s/o: Rizwan ullah IPC deptt

Covernment of KP
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Sayyar Ahmad

Onbil Said

Nadir Khan

Wilnyat Khan

Hakim Khan

Section Officer (Litigition) Government of KP Establishment Department

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899.
            Sher Zamin Khan Superintendent Governor Secretariat Dept Peshawar
            Muhammad Aylb s/o: Mir Azam Balg
Muhammad Aftab Superintendent finance Dept Peshawar
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   902.
            Zarshad Khan s/o; Ulas Khan Superintendent population Dept Peshawar
Muhammad Ayaz Superintendent Augaf Dept Peshawar
   903.
   904.
            Rosool Muhammad
            Shakeel Alimad s/o: Wajeed Gul
   905.
   906.
            Arshad Aziz Quraishi
   907.
            All Nawaz Khan s/o: Hassan Badshah
   908.
            Shah Bakht
   909.
            Khan Raziq
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           Nasib Khan
   911.
            Abdur Rahman s/o: Abbas All Khan
   912.
            Fazai ur Rohmon Superintendent Excise & Texation Dept Peshawar
   913.
            Syed Mukhtiar Ahmad Shah s/o: Syed Noor Muhammad
  914.
           Zahid Shams
  915.
           Zahoor Shah
  916.
           Samin Jan
           Pervez Khan Superintendent transport Dept Peshawar
  918.
           Umar Zada
  919.
           Amanuliah s/o: Karim Gul
  920.
           Muhammad Ilyas s/o; Muhammad Ishague
  921.
           Feroz Khan
  922.
           Muhammad Ibrahim s/o: Akhtar Munir
  923.
           Irfanuliah Superintendent Governor House Dept Peshawar
  924,
           Muhammad Iqbal s/o: Hazrat Shah
           Iftikhar Superintendent E &SE Dept Peshawar
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  926.
           Muhammad Ishaq s/o: Ghulam Halder
  927.
           Shoukat Zaman
  928.
           Sahibzada Abbas Khan
  929.
           Agil Javed
  930.
           Obalduliah Superintendent Home Dept Peshawar
  931.
           Dost Muhammad Superintendent IPC Dept Peshawar
          Savindar Kumar s/o: Kor Chand
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          Shah Wali Klian s/o: Bakht Baldar
  934.
          Juma Khon Superintendent P&D Dept Peshawar
          Riaz Khan Superintendent E&AD Dept Peshawar
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          Said Fagir Superintendent P&D Dept Peshawar
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          Khaliq ur Rahman Superintendent E&SE Dept Peshawar
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          Rahmat Khan
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          Mian Shah Hussain
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          Bakhtiar Wali Khan s/o: Wali Zar Khan Wali
 941.
          Hamayun Khan s/o: Waisai KhanSuperintendent Housing Dept Peshawar
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          HashmatuliahSuperintendent law Dept Peshawar
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          Shahmshad Hussain Superintendent E & SE Dept Peshawar
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          Shal Muhammad Superintendent Mineral Dept Peshawar
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          UmarbazSuperintendent PHE Dept Peshawar
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          Shahbaz Khan Superintendent Health Dept Peshawar
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          Aimal Kha s/o: Jehangir Khan
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          Muhammad Kamran Superintendent law Dept Peshawar
          Syed Muhammad Asif Sattar Superintendent E&AD CS issue Dept Peshawar
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         Muhammad Saleem Sajid
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         Sher Ali KhanSuperintendent IE&SE Dept Peshawar
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         Sawab GulSuperintendent EnviromentDept Peshawar
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         Muhammad Javed s/o: Shah ZamanSuperintendent law Dept Peshawar
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         Rahmat ShahSuperintendent Finance Dept Peshawar
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         Muhammad NawabSuperintendent E&AD HRD il Section Dept Peshawar
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         Muhammad Riaz s/o: Sher Khan Superintendent PHE Dept Peshawar
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         Attique Rahman s/o: Muhammad Ayub Superintent E&SE Dept Peshawar
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         Muliammad FarooqSuperintendent Transport Dept Peshawar
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         Bahar ud Din Superintendent Finance Dept Peshawar
         Ijaz Rahim Superintendent Transport Dept Peshawar
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         Shehryar Ahmad Superintendent excise Dept Peshawar
         Gul Nawaz Khan s/o: Nek Nawaz Khan Superintendent Information Dept Peshawar
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         Zhaid Mehmood Superintendent C&W Dept Peshawar
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         Fazil Rauf Superintendent law Industries Peshawar
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         Sona Khan SuperIntendent P&D Dept Peshawar
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         Muhammad Hashim KhanSuperintendent CM secritoriat Dept Peshawar
        Kifayntullah s/o: Abdus Samad Superintendent law Excise & Taxtaition Peshawar
Miraj s/o: Niaz Muhammad Superintendent Agriculture Dept Peshawar
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         Muhammad Bashir Superintendent E&AD Dept Peshawar
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         Hazrat shah s/o: Ahmad ShahSuperintendent PHE Dept Peshawar
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         Muhammad Riaz s/o: Abdur RahmanSuperintendent Higher eduDept Peshawar
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         BakhtiarullahSuperintendent E&AD Dept Peshawar
        Muhamamd Hanif Superintendent information Dept Peshawar
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        Inayntuliah s/o: Abdur Rashid P&DSuperintendent P&D Dept Peshawar
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        Abdul HananSuperintendent E&SE Dept Peshawar
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        Ejaz Muhammad Superintendent Transport Dept Peshawar
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        Muhammad Saleem s/o: Noor Muhammad Superintendent E & AD Dept Peshawar
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Mushtaq ShahSuperintendent P&D Dept Peshawar

Khizer HayatSuperintendent Finance Dept Peshawar Muliammad Tufall Superintendent Halth Dept Peshawar

Shamsul Islam Superintendent finance Dept Peshawar

Section Officer (Litigitish) Government of KP Establishment Department

Mustafa KamalSuperintendent enviromentDept Peshawar 983. Muhammad QureshiSuperintendent C&W Dept Peshawar JehanzebSuperintendent Home Dept Peshawar Muhammad Aslam s/o: Sher Bandi KhanSuperintendent Governor House Dept Peshawar 984. 985 986 Sultan ShahSuperintendent E &AD Dept Pesliawar Nourcen KayaniSuperintendent population Weifare Dept Peshawar Umar Gul AfridiSuperintendent E & AD Dept Peshawar 987 988 Shah Wali Khan s/o: Khoidad Khan Superintendent CM SecretariatDept Peshawar Ghulam Mustafa HalderSuperintendent Fiannce Dept Peshawar 989. 990. 991. Abdul QadeemSuperintendent E &.AD Dept Peshawar Ayan ShahSuperintendent E& AD Dept Peshawar Zahir Shah s/o: Lal Muhammad Superintendent E &SE Dept Peshawar 993. Fazil Ilisan s/o: Fazil Wahid Superintendent Finance Dept Peshawar 994. 995. Syed Obnidullah ShahSuperintendent Enviroment Dept Peshawar 996. Abdul Khaliq SuperIntendent CM Secretarint Dept Peshawar 997. Abdul Latif s/o: Ibrahim Khan Superintendent Finance Dept Peshawar 998. Iftikhar s/o: Abdul rauf Superintendent Labour Dept Peshawar Badri ZamanSuperintendent E& AD Dept Peshawar Amjad AliSuperintendent Sport Dept Peshawar 999 1000. Zelle Ali HaldariSuperintendent Home Dept Peshawar 1001. 1002. Zahldullah s/o: Naqibullah Klian Superintendent C&W Dept Peshnwar 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. Muhammd YasirSuperintendent KP Culture Tourasim Dept Peshawar Saeeda Khan Superintendent Food Dept Peshawar 1007. 1008 Neelam Superintendent Finance Dept Peshawar Burhan ud Din Superintendent EMA Dept Peshawar 1000 Sidra Ahmad 1010. 1011. Noor sher 1012. Majid Hanan LodhiSuperintendent E&AD Dept Peshawar 1013. Laceq Ahmad Superintendent law E&AD Peshawar 1014, Mustajabul HaqSuperintendent Social Welfare Dept Peshawar 1015. Farman Ali SuperintendentHealth Dept Peshawar 1016. Wazir Muhammad Superintendent Finance Dept Peshawat 1017 Zafaruliah s/o: Arsala Superintendent Irrigation Dept Peshawai 1018. Syed Farooq ShahSuperintendent Admn Dpt Peshawar Slinkeel Ahmad Superintendent Finance Dept Peshawar 1019. 1020. Faroli Seyar Superintendent E&AD Dept Peshawar 1021. Shald Iqual Superintendent Finance Dept Peshawar 1022. Mohsin mushtaqSuperintendent E&ADDept Peshawar 1023. Mulinmmad NomanSuperintendent E&AD Dept Peshawar 1024. Saman ZamanSuperintendent Finance Dept Peshawar 1025. Huma Bakhtiar Superintendent P&D Dept Peshawar 1026. Muhammad Kaleem Jan 1027. Usman Klian s/o: Aziz Asmat Ullah s/o: Ayub Khan 1028. 1079 Syed Sardar Badshah 1030. Aamir Shahzad Khattak 1031. Syed Muhammad Ihsan Superintendent mineral Dept Peshawar 1032. Muhammad Sohall Superintendent Home Dept Peshawar 1033, Sitwat Superintendent Energy & Power Dept Peshnwar Muhammad Saleem Superintendent energy & power Dept Peshawar 1034. Muhammad Shafiq Superintendent Health Dept Peshawar 1035. 1036. Ijaz Muhammad Superintendent Sport Dept Peshawar 1037, Syed Akhtar Ali ShahSuperintendent Finance Dept Peshawar 1038. Adnan yousaf Muhammad Aqeel Superintendent Home Dept Peshawar Adnan Shaukat All Khan 1039. 1040. Asif NabiSuperintendent PSRA Dept Peslinwar Muhammad Aslam Superintendent Finance Dept Peshawar 1041. Imran Saleem Superintendent Finance Dept Peshawar 1042. Shah JehanSuperintendent AgRiculture Dept Peshawar 1043. 1044. Sartaj Khan Superintendent Relief Dept Peshawar 1045. Sohbat Khan Superintendent E&SE Dept Peshawar 1046. Fizza Hassan Saced d/o: Hassan Saced Ahmad Shah

Versuş Hanif ur Rahman, Assistant (BPS-16), Directorate of Prosecution Khyber 1. Pakhtunkhwa.

Government of Khyber Pakhtunkhwa through its Chief Secretary at Civil Secretariat Peshawar and others.

Governement of Khyber Pakhtunkhwa through Secretary Finance Department at civil 3. secretariat Peshawar.

Secretary Administration and Establishment civil Secretariat Peshawar.

......Respondents

Soction Officer (Litigation) Government of KP Establishment Department 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:

 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)

 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 misjoinder 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: Ideliberatly 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

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Government of KP
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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 inknowledge and totally un aware in respect of proceedings of the subject appeal and judgment passed in the back of Petitioners, hence the judgment is faultfull, illegal and is mob, needs to be rejection,
- 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. Zin 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 (Litigition)
Government of KP
Catablishment 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: 242/2022OF 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 Petitionershave 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.
- 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 EXECTUION PROCEEDING AS REQUESTED HEREINABOVE 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 (Litigition)
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 CLUBBING THE ABOVE CAPTIONED PETITION WITH EXECUTION PETITION NO: 242/2022OF 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: 242/2022which execution petition is fixed for hearing on 27.09.22.
- 3. That if the above captioned petition will not 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 fixed/clubbed with the mentioned execution petition.

Dated: 23-09-2022

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

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.

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.

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.

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:-

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

CRITERIA FOR DECLARING A GOVERNMENT SERVANT AS SURPLUS AS A 4. 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.

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:-

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

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- (i) to proceed on retirement with normal retiring benefits under the existing rules;
- OR

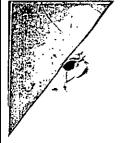
 (ii) to opt for readjustment/absorption against a future vacancy of his status/BPS which may not necessarily be in his original cadre/department.
- Those who opt for retirement would be entitled for usual pension and gratuity according to the existing Government Servants Pension and Gratuity Rules of 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.
 - (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) 84 In 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.

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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.



- (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.
- 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.
- 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.

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

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

NOTE:-

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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 loose 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-J(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.
- 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.

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- 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)

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