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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 1852/2023

SYED MOHSIN AHMAD BUKHERI APPELLANT

VERSUS

**CHIEF SECRETARY KHYBER PAKHTUNKHWA &
OTHERS.....RESPONDENTS**

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**Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1852 /2023

Syed Mohsin Ahmad Bukhari, Deputy Director Industries, Commerce & Trade (BPS-18)
Kohat Region, Kohat. **APPELLANT**

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary Finance Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Secretary Establishment Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. The Secretary, Industries, Commerce & Technical Education Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
5. The Director General Industries & Commerce, Khyber Pakhtunkhwa, Peshawar

.....**RESPONDENTS**

JOINT PARA-WISE-COMMENTS ON BEHALF OF RESPONDENTS NO.1, 2, 3, 4 &

5.

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS:

- A. That the Appellant has no locus standi to file this instant Appeal.
- B. That the Appellant has no cause of action.
- C. That the Appeal is bad for misjoinder of necessary parties.
- D. That the Appeal is based on malafide intention and it has been filed with ulterior motives to coerce and pressurize the respondents.
- E. That the Appellant is estopped by his own conduct from instituting this Appeal.
- F. That the instant Appeal is barred by law.

ON FACTS:

1. Correct.
2. Correct.
3. Correct, however after separation from Directorate of Mines & Mineral and from Labour Department, Directorate of Industries & Commerce was established in 2010. As a result of separation new posts were created for which Directorate of Industries & Commerce framed new service rules 2012 under Civil Servant Act 1973. Copy of service rules 2012 attached as **annexure-A** and copies of demerger Notification as **annexure-B**.
4. Incorrect. The Directorate of Industries & Commerce was not upgraded to Directorate General, Industries & Commerce in 2012 rather it was separated from Directorate of Labour in 2010 and became separate Directorate of Industries & Commerce. The Directorate of Industries & Commerce upgraded to Directorate General, Industries & Commerce in 2021. The Service rules for all the posts were framed in 2012 under Civil Servant Act 1973. The Service Rules for the recruitment of Additional Director(BPS-19) framed under the Civil Servant Act, 1973 and were thoroughly examined by the Standing Service Rules Committee (Chaired by the Secretary

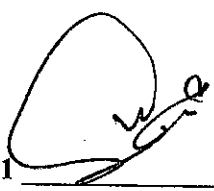
Industries, Commerce and Technical Education Department, representatives of Finance Department, Establishment Department and Law and Parliamentary Affairs Department being members of the (SSRC). After vetting by Public Service Commission and Law and Parliamentary Affairs Department, Service Rules were published in the official gazette on 08.06.2012 and equal opportunity is given to all the Officers.

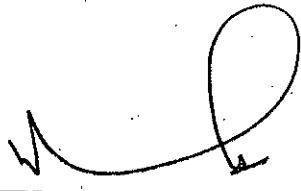
- 5. Correct. The tentative seniority list was issued according to approved Service Rules and circulated among all the concerned vide letter No.3039-46-DI-Admn:dated 10.03.2023 copy attached as annexure-C.
- 6. Incorrect. The appellant will be considered for promotion in due course of time based on seniority, suitability and availability of vacancy.
- 7. Incorrect, however, the appellant was responded vide this Directorate General letter No.7581-DI-Admn: dated 07.08.2023. Copy attached as annexure-D and the allegations of the petitioner are baseless and not true.
- 8. No comments.

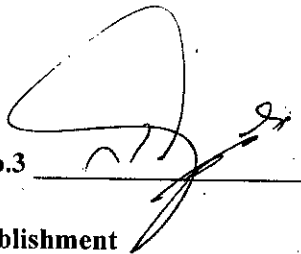
GROUND:

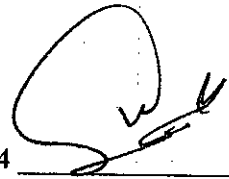
- A. Incorrect: The Service Rules were framed in 2012, whereas line of promotion was given to Chief Inspector of Boilers (BPS-18) to the post of Additional Director (BPS-19), hence opportunity for promotion was given to all officers in BPS-18. After creation of new posts in BPS-19 i.e., Director, Commerce & Trade (BPS-19) and Director, Industries (BPS-19), equal opportunity of promotion was given to all officers in BS-18. The appellant challenged the Service Rules of the department upon which he himself was recruited in 2015.
- B. Incorrect: Tentative seniority list was issued correctly in 2022 as per service rules.
- C. Incorrect. As explain above.
- D. No Comments.
- E. Incorrect. The Article 4 and 25 of the Constitution of Islamic Republic of Pakistant1973 were not violated but to comply by giving the right of promotion to the Chief Inspector of Boilers (BPS-18). The allegations are not true.
- F. Incorrect. The allegations of the appellant are not true as explained above.
- G. Incorrect. The allegations of the appellant are not true.
- H. Correct but it is worth mentioning that the line of promotion of Chief Inspector of Boiler (BPS-18) to the post of Additional Director (BPS-19) did not suffer the income and earning of the appellant while Section 25 of the Constitution of Islamic Republic of Pakistan states that: **All citizens are equal before law and are entitled to equal protection of law.**
- I. The respondents seek permission to advance other grounds and proofs at the time of hearing.

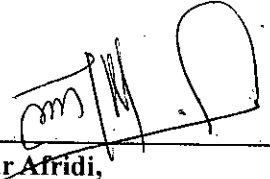
Keeping in view the above, it is very humbly prayed that the petition in hand being devoid of merit, may graciously be dismissed with cost.


Respondent No.1
Nadeem Aslam Chaudhary
Chief Secretary to
Government of Khyber Pakhtunkhwa,
Peshawar.


Respondent No.2
Amer Sultan Tareen
Secretary Finance
Government of Khyber Pakhtunkhwa,
Peshawar.

for

Respondent No.3
Shahidullah,
Secretary Establishment
Government of Khyber Pakhtunkhwa,
Peshawar.


Respondent No.4
Syed Zulfiqar Ali Shah
Secretary Industries
Government of Khyber Pakhtunkhwa,
Industries, Commerce & Technical
Education Department, Peshawar.
Secretary Industries, Commerce
and Technical Education Department
Khyber Pakhtunkhwa, Peshawar.


Respondent No.5
Muhammad Kabir Afridi,
Director General,
Industries & Commerce,
Khyber Pakhtunkhwa, Peshawar.

DIRECTOR GENERAL
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar



Amer "A"

GOVERNMENT OF KHYBER PAKHTUNKHWA
INDUSTRIES, COMMERCE AND TECHNICAL
EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the 8th June, 2012

No. SOI(IND)2-1/91/Vol-IV: In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supercession of all previous Rules and Notifications, issued in this behalf, the Industries, Commerce and Technical Education Department, in consultation with the Establishment Department and the Finance Department, hereby lays down, the method of recruitment, qualification and other conditions specified in Column 3 to 5 of the Appendix which shall be applicable to the posts borne in the Directorate of Industries and Commerce, Khyber Pakhtunkhwa, specified in Column No. 2 of the Appendix.

APPENDIX

DIRECTORATE OF INDUSTRIES AND COMMERCE, KHYBER PAKHTUNKHWA.

S.No.	Nomenclature of posts.	Qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2	3	4	5.
1	Director (BFS-19)			By transfer from amongst Officers of the District Management Group/Provincial Civil Services (Executive Group)/ Provincial Civil Service (Secretariat Group)/Provincial Management Services.
2	Additional Director (BPS-19)			By promotion, on the basis of seniority-cum-fitness, from amongst Deputy Directors and Chief Inspector of Boilers with at least seven years service in BS-18 or twelve years service in BS-17 and above.
3	Deputy Director (BFS-18)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors with five years service as such.

W. Ahmad
Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

from a recognized
Degree
R.Sc./L.L.B

4	Chief Inspector of Boilers (BPS-18).	(i) M.S in Mechanical Engineering (with at least 2 nd Division) from a recognized University with three years experience in the relevant field. (ii) B.Sc in Mechanical Engineering (at least 2 nd Division) from a recognized University with five years experience in the relevant field. (iii) 1 st class certificate of competency from the Board of Examining Engineering under the Boiler Act.	30 to 40 years	(i) By promotion from amongst the Inspector of Boilers with at least five years service as such. (ii) If no suitable person is available for promotion, then by initial recruitment.
5	Inspector of Boilers (BPS-17).	At least 2 nd Division B.Sc. Mechanical Engineering or B.Tch (Honour) Mechanical Engineering from a recognized University.	21 to 32 Years.	By initial recruitment.
6	Assistant Director (BPS-17).	At least 2 nd Division Master's Degree in Chemistry, Physics, Business Administration, Public Administration, Economics, Political Science, Statistics, commerce, Mathematics, Computer Science, Mechanical, Textile, Electrical, Agriculture Engineering or LLB from a recognized University.	21 to 32 years.	(a) Sixty percent(60%) by promotion, on the basis of seniority-cum-fitness, from amongst the Industrial Development Officers, with five years service as such, and (b) Forty percent(40%) by initial recruitment.
7	Administrative Officer (BPS-17).	—	—	By promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents, with five years service as such.
8	Accounts Officer (BPS-17).	Master's Degree with at least 2 nd Division in M.Com, MBA, CA or B.Com (Hons), from a recognized University.	21 to 32 years.	By initial recruitment.
9	Industrial Development Officer (BPS-16).	Master's Degree with at least 2 nd Division in Business Administration, Public Administration, Commerce, Political Science, Mathematics, Economics, Statistics, Chemistry, Physics or LLB from a recognized University.	21 to 32 years.	(a) Fifty percent(50%) by promotion, on the basis of seniority-cum-fitness, from amongst Assistant Industrial Development Officers with five years service as such, and (b) Fifty percent (50%) by initial recruitment.
10	Superintendent (BPS-16).	—	—	(a) Seventy-five(75%) percent by promotion, on the basis of seniority-cum-fitness, from amongst the Assistants with five years service as such; and (b) Twenty five percent (25%) by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers with five years service as such.
11	Senior Scale Stenographer	—	—	By promotion, on the basis of joint seniority-cum-fitness, from amongst Junior Scale Stenographers and Computer Operators subject to clearance of Departmental test of Shorthand with a

Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

				speed of fifty words per minute in English with three years service as such.
12.	Assistant (BPS-14).	Bachelor's Degree from a recognized University with at least 2 nd Division.	21 to 32 years.	(a) Sixty-five(65%) percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks, with three years service as such; and (b) Thirty-five(35%) percent by initial recruitment.
13.	Computer Operator (BPS-12).	Bachelor's Degree with at least 2 nd Division from a recognized University, with one year Diploma in Information Technology or its equivalent qualification from Board of Technical Education.	21 to 32 years.	By initial recruitment.
14.	Junior Scale Stenographer (BPS-12).	(a) F.C.S. (Faculty of Computer Science) with at least 2 nd Division from a recognized Board; and (b) a speed of fifty words per minute in shorthand in English and thirty five words per minute in typing.	18 to 32 years.	By initial recruitment.
15.	Assistant Industrial Development Officer (BPS-11).	Bachelor's Degree (at least 2 nd Division) from a recognized University, in Physics, Chemistry, Commerce, Economics, Mathematics or Statistics as one of the subject.	21 to 32 years.	By initial recruitment.
16.	Senior Clerk (BPS-09).			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks with three years service as such.
17.	Junior Clerk (BPS-07).	(a) Secondary School Certificate with at least 2 nd Division from a recognized Board; (b) a speed of thirty words per minute in typing, and (c) Computer literate.		(a) Thirty percent(30%) by promotion, on the basis of seniority-cum-fitness, from amongst the Daftaris, who have passed Secondary School Certificates Examination with two years service as such; or (b) If no suitable Daftari is available then by promotion from amongst the Naib Qasids, Chowkidars, Mali, Bhishti, Dak Runner and Sweeper etc, who have passed Secondary School Certificate Examination with two years service as such; and (c) Seventy percent(70%) by initial recruitment.
18.	Driver (BPS-04).	Having a valid Driving licence of Heavy Transport Vehicle/Light Transport Vehicle, with at least five years experience of practical driving.	18 to 32 years.	By initial recruitment.
19.	Daftari (BPS-02).			By promotion, on the basis of seniority-cum-fitness from amongst the Naib Qasids, Chowkidars, Mahs, Bhishtis, Dak Runners and Sweepers who have passed at least middle with

B.Sc./L.L.D

[Signature]
 Assistant Director Litigation
 Directorate General of
 Industries & Commerce
 Khyber Pakhtunkhwa, Peshawar

				two years service as such.
20.	Naib Qasid/ Dak-Runner (BPS-01).	Literate.	---	By initial recruitment.
21.	Chowkidar (BPS-01).	---	18 to 35 years.	By initial recruitment.
22.	Bhishti (BPS-01).	---	18 to 35 years.	By initial recruitment.
23.	Mali (BPS-01).	---	18 to 35 years.	By initial recruitment.
24.	Sweeper (BPS-01).	---	18 to 35 years.	By initial recruitment.

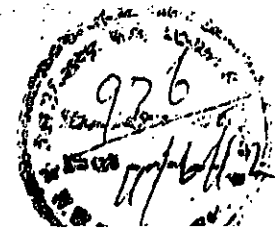
Secretary to Government of Khyber Pakhtunkhwa,
Industries, Commerce & Technical Education Department
Dated Peshawar the 8th June, 2012.

Endst. No. SOI (IND)2-1/91/Vol-IV 71 8607273
Copy forwarded to:-

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. All Head of Attached Department..
5. All DCOs in Khyber Pakhtunkhwa.
6. All Distt. & Session Judges, Khyber Pakhtunkhwa.
7. Registrar Peshawar High Court Peshawar.
8. Secretary, Board of Revenue, Khyber Pakhtunkhwa.
9. Registrar, Service Tribunal, Khyber Pakhtunkhwa, Peshawar.
10. P.S to Minister for Industries & Commerce, Khyber Pakhtunkhwa.
11. The section Officer (Regulation-I) Govt. of Khyber Pakhtunkhwa, Establishment Department.
12. The Director, Industries & Commerce, Khyber Pakhtunkhwa, Peshawar.
13. The Manager, Printing & Stationery Department, Peshawar with the request to provide ten printed copies of the Gazette notification for onward submission to Law Department.

Masood
Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

AD (Admin)
[Signature]



[Signature]
(Mohammad Ayaz Khan Momand)
Section Officer (Admin)



ESTABLISHMENT & ADMN: DEPARTMENT
(Regulation Wing)

Dated Peshawar the 6th March, 2010

9

NOTIFICATION

No. SO(O&M)E&AD/2-39/2010. In exercise of the powers conferred by Article 139 of the Constitution of the Islamic Republic of Pakistan, the Governor of the North West Frontier Province is pleased to direct that in the North-West Frontier Province Government Rules of Business 1985, the following further amendments shall be made, namely

AMENDMENTS

1. In Schedule-I -

(i) against serial No 12,-

(a) in column No 2, the comma and word "Labour" shall be deleted,
(b) in column No 3, for the clause (c), the following shall be substituted, namely

"(c) Directorate of Industries and Commerce", and

(c) in column No 4, for the clause (c), the following shall be substituted namely

(c) Director Industries and Commerce " and

(ii) after serial No. 15 the following new entries shall be inserted in the respective columns, namely

1	2	3	4
(a)	Labour Department	Directorate of Labour	Director Labour

2. In Schedule-II,-

(i) from the heading "INDUSTRIES, COMMERCE, LABOUR AND TECHNICAL EDUCATION DEPARTMENT", the comma and word "LABOUR" shall be deleted.

(ii) under the heading "INDUSTRIES, COMMERCE AND TECHNICAL EDUCATION DEPARTMENT", as so amended,-

(a) the sub-heading "Labour Welfare" and functions thereunder at serial No 15, 16, 17, 18, 19, 20 and 21 shall be deleted, and

(b) in the sub-heading "Technical Education", after serial No. 22, the following new entries shall be inserted, namely

*23. Resettlement and Employment of demobilized personnel.

24. Technical Training Centres

[Signature]
Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

GOVERNMENT OF N.W.F.P,
ESTABLISHMENT & ADMINISTRATION DEPARTMENT
(REGULATION WING)

Dated Peshawar, the 31st August, 2001

NOTIFICATION

No.SO(O&M)ExA/B-1/2001. The Competent Authority is pleased to order the merger of the Directorate of Industries NWFP with Directorate of Labour NWFP with immediate effect.

2. The newly Directorate after merger is renamed as "Directorate of Industries, Commerce & Labour NWFP " and will continue as an Attached Department of the Industries, Commerce, Labour, Mineral Development & Technical Education Department NWFP.

3. The existing Directorate of Industries NWFP will cease henceforth.

4. Necessary amendments in the NWFP Government Rules of Business 1988 will be made separately.

**CHIEF SECRETARY
GOVERNMENT OF NWFP**

Encls. No. & Date Even.

Copy forwarded to the :-

1. All Provincial Ministers, NWFP.
2. All Administrative Secretaries ,NWFP.
3. Secretary to Governor, NWFP.
4. COS HQrs 13 Corps Peshawar Cance
5. All District Coordination Officers NWFP.
6. Accountant General, NWFP.
7. All Heads of Attached Departments in NWFP.
8. Director Information NWFP.
9. All Heads of Autonomous /Semi Autonomous Bodies in NWFP.
10. Registrar Peshawar High Court, Peshawar.
11. Registrar, NWFP Services Tribunal ,Peshawar.
12. All Additional Secretaries/Deputy Secretaries in Establishment & Administration Department
13. Private Secretary to Governor, NWFP.
14. Private Secretary to Chief Secretary, NWFP.
15. Manager Government Printing Press, Peshawar
16. Section Officer (Admin) Government of NWFP, Industries, Commerce, Labour, Mineral Dev: & Technical Education Department with reference to his letter No.SOI(IND)9-1/2001, dated.21.08.2001.

Wameez
Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

[Signature]
31/8/2001

Annex "C"

11

TENTATIVE SENIORITY LIST OF DEPUTY DIRECTOR AND CHIEF INSPECTOR OF BOILER (IPS-19) AS STOOD ON 31.12.2022

TOTAL SANCTIONED PERMANENT POSTS OF DEPUTY DIRECTORS = 08-POSTS

S. No.	Name of the officer	Date of birth with domicile	Date of Retirement	Date of 1 st entry into Govt. Service	Date of regular appointment/promotion to the present post	Present posting/ District	Remarks
1.	Muhammad Hanif Khan, M.Sc. (Economics)	07.01.1966 Lakki Marwat	06.01.2026	11.06.1991	15.09.2014	Head Office, Peshawar	By Promotion
2.	Mr. Feroz Shah, B.A & Boilers Engineer.	02.01.1969 N. Waziristan	01.01.2029	02.12.1993	26.01.2021	Head Office, Peshawar	-do-
3.	Mr. Mujahid Khan, M.Sc.	02.01.1968 Molamand	01.01.2028	06.02.1995	31.01.2022	Head Office, Peshawar	-do-
4.	Syed Sajjad Ali Shah, M.Phil. (Economics)	25.04.1963 Nowshera	24.04.2023	24.07.1996	19.04.2022	Office of DD IC&T Hazara Region	-do-
5.	Mr. Shalab Nawaz, M.Sc. (Economics)	15.05.1985 Mabkand	14.05.2045	20.05.2013	19.04.2022	Head Office, Peshawar	-do-
6.	Syed Mohsin Ahmad Bukhari, MSBA + LLB + ACCA + M.Sc. (Economic)	30.11.1985 Peshawar	29.11.2048	24.03.2008	19.04.2022	Office of DD IC&T Kohat Region	-do-
7.	Syed Badshah, M.A (Polit. Science, Eng. & IR)	11.11.1984 Kurram	10.11.2044	07.10.2011	19.04.2022	Office of DD IC&T Peshawar Region	-do-
8.	Mr. Asif Raza, M.Sc. (Economics) + LLB	05.03.1985 Dir Lower	04.03.2045	02.06.2015	19.04.2022	Office of DD IC&T Mabkand Region	-do-

Encls: No. 3039-46/142-DI-Admn:

Director General, I&C
Khyber Pakhtunkhwa
Dated: 15/03/2023

Copy of the above is forwarded to all concerned officers for information. They are requested to confirm their placement in the list and if there is any objection on their placement in the seniority list, they can submit representation within 15-days of the receipt of this communication otherwise it will be presumed that their placement is correct and seniority will be finally notified.

Handwritten Signature
Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

Handwritten Signature
Administrative Officer
Directorate General Industries and Commerce,
Khyber Pakhtunkhwa, Peshawar



Amir D

12

**DIRECTORATE GENERAL,
INDUSTRIES AND COMMERCE
KHYBER PAKHTUNKHWA, PESHAWAR**

Printing Press Shami Road, Peshawar.

No. 7581 /1/42-DI-Admn:

Dated. 7-8/2023.

To,

Syed Mohsin Ahmad Bukhari,
Deputy Director, Industries, Commerce and Trade,
Kohat Region Kohat.

Subject: - **REPRESENTATION ON TENTATIVE SENIORITY LIST 2023 OF DEPUTY DIRECTORS & CHIEF INSPECTOR OF BOILERS (BPS-18) OF DIRECTORATE GENERAL OF INDUSTRIES & COMMERCE, KHYBER PAKHTUNKHWA, PESHAWAR.**

I am directed to refer to your representation alongwith its enclosures dated 11.04.2023 on the subject cited above and to state that tentative seniority list was issued according to notified Service Rules while objection on Service Rules may be raised in competent forum, please.

o/c
[Signature]
Administrative Officer,
Directorate General Industries & Commerce,
Khyber Pakhtunkhwa, Peshawar

Endst: No. 7581 /1/42-DI-Admn:

Dated. 7/8/2023.

Copy of the above is forwarded to: -

1. PS to Directorate General, Industries and Commerce, Khyber Pakhtunkhwa, Peshawar.
2. PA to Director Administration, Hqtrs Office, Peshawar

o/c
[Signature]
Administrative Officer,
Directorate General Industries & Commerce,
Khyber Pakhtunkhwa, Peshawar

[Signature]
Assistant Director Litigation
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

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SYED MOHSIN AHMAD BUKHERI APPELLANT

VERSUS

**CHIEF SECRETARY KHYBER PAKHTUNKHWA &
OTHERS.....RESPONDENTS**

AFFIDAVIT

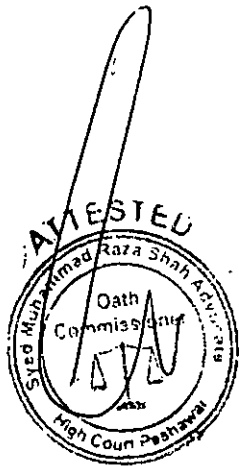
I, Muhammad Kabir Afridi, Director General (BPS-19) of Industries & Commerce, Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm and declare on oath that the contents of the accompanying comments/ reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court. It is further stated on oath that in this Appeal the answering respondent have neither been placed Ex-Parte nor their defense has been struck off/cost.



DEPONENT

Muhammad Kabir Afridi
CNIC: 15602-6093096-0
CELL: 0333-8393939

DIRECTOR GENERAL
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar





**DIRECTORATE GENERAL OF INDUSTRIES AND COMMERCE KHYBER
PAKHTUNKHWA, PESHAWAR.**

Government Printing Press Building, Shami Road, Peshawar. (091) 9210234

14

AUTHORITY LETTER.

Mr. Muhammad Mansoor, Assistant Director Litigation (BPS-17), H/Qtrs Office Peshawar is hereby authorized to defend Secretary Industries, Commerce and Technical Education Department, Khyber Pakhtunkhwa, Peshawar (Respondent No.04) and Director General, Industries and Commerce, Khyber Pakhtunkhwa, Peshawar (Respondent No.05) in the Service Tribunal, Khyber Pakhtunkhwa, Peshawar and to submit any documents on behalf of the aforementioned respondents whenever required by the Honourable Court in Service Appeal No.1852/2023 in the case titled as:

SYED MOHSIN AHMAD BUKHARI

VERSUS

CHIEF SECRETARY KHYBER PAKHTUNKHWA & OTHERS.

Respondent No. 04
Syed Zulliqar Ali Shah,
Secretary Industries, Commerce & Tech:
Education Department, Khyber Pakhtunkhwa,
Peshawar.

Secretary to
Govt of Khyber Pakhtunkhwa,
Industries, Commerce &
Technical Education Dept.

Respondent No. 05
Muhammad Kabir Afridi,
Director General,
Industries and Commerce,
Khyber Pakhtunkhwa, Peshawar.

DIRECTOR GENERAL
Directorate General of
Industries & Commerce
Khyber Pakhtunkhwa, Peshawar