

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No. 1129/2023

Attaullah APPELLANT

VERSUS

1. Govt of KPK through Secretary Forest KPk and others.

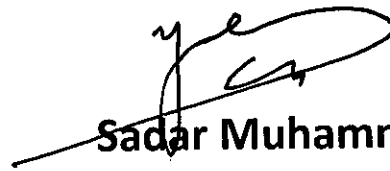
..... **RESPONDENTS**

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1.	Para-Wise Comments along with affidavit		1-6
2.	Copy of Rules	A	7-9
3.	Copy of Merit List of 2017.	B	10-12
4.	Copy of final seniority list of 2017 and 2023.	C	13-18

DATED: 08-01-2024

Respondent No. 4



**Sadar Muhammad Saleem
DIVISIONAL FOREST OFFICER
HAZRA TRIBAL FOREST DIVISION
BATAGRAM**

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①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10513

Dated 11-1-2024

Attaullah

APPELLANT

VERSUS

Govt of KPK etc

RESPONDENTS

SERVICE APPEAL

PARAWISE COMMENTS ON BEHALF OF

RESPONDENTS NO.1 TO 4

Respectfully Sheweth: That the respondents submit as under:

PERLIMINARY OBJECTION:

- 1) That the appellant has got no cause of action against the respondents.
 - 2) That the appellant is stopped to sue due to this conduct.
 - 3) That the instant appeal is not maintainable in its present form.
 - 4) That the appellant has not come to his Honorable Tribunal with clean hands.
 - 5) That appellant has got no locus standi to file the instant appeal.
 - 6) That the seniority list has been prepared accordance with the law and rules on the subject.
- ②

- 7) That the instant appeal is liable to be rejected with costs.
- 8) That the appeal is barred by law and limitation.

ON FACTS.

- 1. Pertains to record, hence need no comments.
- 2. In correct hence denied. As Forest Guard is a Forest Divisional cadre post, therefore, respondent No. 4 being appointing authority prepared seniority list of Forest Guard is accordance with law and rules on the subject. Specifically, section 8 (3) of the civil servant Rules 1973 and Rules-~~70~~17 (1) (a) of the Appointment Promotion and Transfer Rules-1989.
- 3. Departmental appeal was rightly rejected by the appellant authority as the same carried no legal weight, and devoid Rules.
- 4. In correct. The petitioner concealed the facts and quoted wrong precedents of other Forest Division regarding preparation of seniority lists. As reveals from the record the seniority list of Forest Guards always prepared according to Rules 17(1) (a) of the Appointment, Promotion and Transfer Rules-1989. Therefore, the plea of the petitioner regarding fixation of his seniority in light of Rules-17 (4) is not

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applicable. Rule-17 (4) is relate to seniority of Civil Servants in a certain cadre to which promotion is made from different lower posts earning the same pay scale from the date of regular Appointment Promotion of the Civil Servants in the lower post. (Annexed). Transfer Rules-1989 the specific rules is reproduced below.

"17. Seniority:- (1) The seniority inter se of civils servants (appointed to service cadre on post) shall be determined.

(a) In case of persons appointed by initial recruitment in accordance with the order of merit assigned by the commission or as the case may be the departmental selection committee. provided that persons selected for appointment to a post in earlier selection shall rank senior to the persons selected in a later selection! and." (Copy of Rule is annexed as Annexure "A".)

5. The petitioner treated according to rules hence this service appeal may kindly have dismissed on the following grounds.

ON GROUNDS: -

- a. Incorrect. As already explained in paras 2,3 & 4 of the facts the seniority list has been prepared in accordance with law and rules on the subject.
- b. In correct. As already explained in paras 2,3 & 4 of the facts hence no rights the present appellant has been infringed by the department.

c. In correct, As already explained in paras 2,3 & 4 of the facts.

Moreover

the Appointment, Promotion and Transfer Rules-1989 clearly provides for seniority of Civil Servants which reckons in accordance with the order of merit assigned by the commission or DSC as the case may be and not on the basis of age. Rule No 17 (4) has been misinterpreted by the petitioner. It is pertinent to mentioned here that after the initial recruitment Forest Guards vide office Order No. 19 dated 03.10.2016, final seniority list was prepared in the respect of Hazara Tribal Forest Division Battagram dated 14.12.2017 which was never challenged by the present appellant before any forum hence the instant appeal being devoid of any merits is liable to be dismissed. **(Copies of Final Merit list and seniority list of 2017 and 2023 are annexed as Annexure "B" & "C" respectively).**

d. Incorrect. As already explained in para 2,3 & 4 of the facts and para "C" of the grounds.

e. That the respondent also seek permission to the raise further point at the time Arguments.

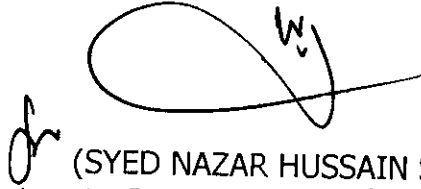
f. Incorrect.

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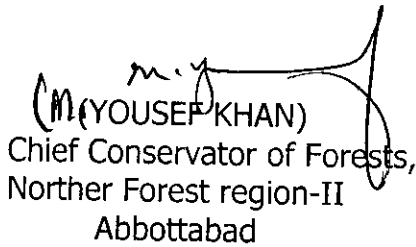
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PRAYER: -


It is therefore, humbly prayed that the instant appeal may please be dismissed with cost, state-away being devoid the rules.




(SYED NAZAR HUSSAIN SHAH)
Secretary to Government of Khyber Pakhtunkhwa
Climate Change, Forestry, Environment and Wildlife Department
Peshawar



(M. YOUSEF KHAN)
Chief Conservator of Forests,
Northern Forest region-II
Abbottabad



(FARRUKH SAIR)
Conservator of Forest
Upper Hazara Forest Circle
Mansehra



(SARDAR MUHAMMAD SALEEM)
Divisional Forest Officer
Hazara Tribal Forest Division Battagram

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BEFORE THE HONOURABLE SERVICES TRIBUNAL KPK, PESHAWAR

Appeal No.1129/23

Attaullah

(Appellant)

Versus

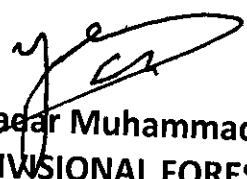
1. Govt of KPK through secretary forest KPk and others

(Respondents)

AFFIDAVIT:

I, Mr. Sardar Muhammad Saleem Divisional Forest Officer do hereby solemnly affirm and declare on oath that the contents of the para -wise Comments are correct up to the best of my knowledge and nothing has been concealed from this honorable Tribunal.

Respondent No. 4


Sardar Muhammad Saleem
DIVISIONAL FOREST OFFICER
HAZRA TRIBAL FOREST DIVISION
BATAGRAM

ATTESTED



CHAPTER-2

Section-1

Statutory provision regarding Appointment.

Section 5 of Civil Servants Act, 1973 - Appointment to a civil service of the Province or to a civil post in connection with the affairs of the Province shall be made in the prescribed manner by the Governor or by a person authorized by the Governor in that behalf.

The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

PART-I GENERAL

1. Short title and commencement:- (1) These rules may be called the Khyber Pakhtunkhwa (Appointment, Promotion, and Transfer) Rules, 1989.

(2) They shall come into force at once.

2. Definitions :- (1) in these rules, unless the context otherwise requires:-

(a) "Appointing Authority" in relation to a post, means the persons authorized under rule 4 to make appointment to that post;

(b) "Basic Pay Scale" means Basic Pay Scale for the time being sanctioned by Government, in which a post or a group of posts is placed;

(c) "Commission" means Khyber Pakhtunkhwa Public Service Commission.

(d) "Departmental Promotion Committee" means a committee constituted for making selection for promotion or transfer to such posts under a Department, or offices of Government, which do not fall within the purview of the Provincial Selection Board.

(e) "Departmental Selection Board" means a Board constituted for the purpose of making selection for initial recruitment /appointment to posts under a Department or office of Government in Basic Pay Scale 17 not falling within the purview of the Commission"

Provided that more than one such committees may be constituted for civil servants holding different scales of pay".

(e) "Departmental Selection Committee" means a committee constituted for the purpose of making selection for initial appointment to posts under a department, or office of Government {in Basic Pay Scale 17 and below not falling within the purview of the Commission}:

Attested
M. J. J.

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(3) In case no specific order of extension of probation period under sub-rule (2) is issued, on the expiry of one year within two months, the probation shall stand automatically terminated.

(4) In case of extension of probation period, through specific order for another year, under sub-rule (2), the probation shall stand automatically terminated on the completion of extended period. *Rule 15 Substituted vide No.SG(Policies) E & AD/1-3/2017 dated 07-12-2017

16. **Confirmation:**-After satisfactory completion of the probationary period, a civil servant shall be confirmed; provided that he holds a substantive post, provided further that a civil servant shall not be deemed to have satisfactorily completed his period of probation, if he has failed to pass an examination, test or course or has failed to complete successfully a training prescribed within the meaning of sub-section (3) of Section 6 of the Khyber Pakhtunkhwa Civil Servants Act, 1973.

PART-VI

SENIORITY

17. **Seniority :-**(1) The seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

(a) ✓ in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission [or as the case may be, the Departmental Selection Committee;} provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and

(b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation. I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely affect the interest of his seniors in fixation of his seniority in the higher post.

Explanation. II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

Explanation. III:- A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

Attested
4/10/17

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-a-viz those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

(3)* In the event of merger/restructuring of the Departments, Attached Departments or Subordinate offices, the inter-se- seniority of the civil servants affected by the merger/ restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

*Sub-Rule (3) of Rule 17 added vide No.SOR(E&A)/4-1/80(Vol:IV) Dated 28-5-2002

** (4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the lower post is the same, the civil servant older in age, shall be treated senior

** Sub-Rule (3) of Rule 17 added vide No.SOR(E&A)/1-3/2008 Dated 19-11-2009

*[The Secretary Establishment has been authorized to approve the issuance of the seniority lists of the members of service, cadre or posts for which the Chief Secretary KP is the appointing authority.] *No. SO(P) E&D/1-16/2011 Dated 7-12-2017

18. **General Rules:-** In all matters not expressly provided for in these rules, civil servants shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

19. **Repeal;-** The Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules,1975, are hereby repealed.

Attested
M. J. [Signature]

Annexure B
3 pages

(10)

FINAL MERIT LIST OF SHORT LISTED CANDIDATES FOR INTERVIEW (RECURTMENT) OF FOREST GUARDS IN RESPECT OF HAZARA TRIBAL FOREST DIVISION BATTAGRAM HELD ON 17/10/2016.

S.No.	Name & parentage home Address and CNIC Number	Date of Birth	Domicile	Physical Measurements				Academic Record					Total NTS Marks (A+B+C+D)	Interview Marks to be awarded by (DSC) Total 08 marks	G. Total	Position
				Height (Inches)	Chest Size e- Min	Chest Size- Max	Running	Merit Score (A)	Merit Score (B)	Merit Score (C)	Merit Score (D)	Total ESTA code Aggregate marks				
1-	Saifullah S/O Rustam Khan of Banna CNIC# 13201-7733371-3	10.3.091	Battagram	67.9	35	37	Ok	35	35	6		76	106	05	111	
2-	Tariq Aziz S/O Gulbar Khan of Btg CNIC# 13202-3531888-3	12.1.095	Battagram	68.1	35	36.5	Ok	35	35	6		76	102.5	05	107.5	
3-	Shahid Akbar S/O Muhammad Aseem of Battagram CNIC# 13202-3596427-1	31.1.092	Battagram	67.2	35	36.5	Ok	35	35	0	8	78	98	05	103	
4-	Sheryar Khan Niazi S/O Niaz Muhammad Khan Niazi of Batamori CNIC# 13202-4763480-1	5.4.093	Battagram	66.5	35.5	37	Ok	35	35	6		76	97	05	102	
5-	Syed Hammad Ali Shah S/O Syed Amir Afsar Shah of Biland Kot CNIC# 13202-0581548-9	12.4.089	Battagram	66.8	34.5	36	Ok	35	35	6		76	95	05	100	
6-	Farman ullah S/O Umer Sharif of Chiran Rabat Kanwo Allai CNIC# 13201-2088078-3	1.1.094	Battagram	68.5	35	36.5	Ok	35	35	6		76	94	05	99	
7-	Waheed S/O Muhammad Waheed of Jso Bazar CNIC# 13202-9602721-5	14.3.094	Battagram	67	36	38	Ok	35	35	0		70	91	05	96	
8-	Naeem ul Hadi S/O Muhammad IRshad of Battagram CNIC# 13202-4820518-9	12.12.092	Battagram	66	34	35.5	Ok	26	35	6		67	90.5	05	95.5	
9-	Atta ullah S/O Aurngzeb of Phagora CNIC# 13202-6359050-7	7.3.089	Battagram	71.3	34.5	36	Ok	35	27	0	8	70	89	05	94	

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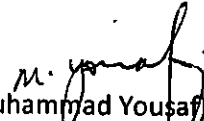
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10-	Ahmad Saeed Khan S/O Muhammad Parviat Khan of Saddeen Mera CNIC# 13202-8787983-3	10.3.096	Battagram	66.5	34	36	Ok	35	35	0		70	88	05	93	
11-	Muhammad Saeed S/O Ghulam Ghous of Shamlai CNIC# 13202-3268062-3	13.8.96	Battagram	67	34	36	Ok	35	27	0		62	87.5	05	92.5	
12-	Fazal Rabi S/O Faqeer Muhammad of Jambira CNIC# 13201-3318900-3	11.11.090	Battagram	69.6	42	43.5	Ok	35	27	6		68	87	05	92	
13-	Noshad Khan S/O Aurangzeb Khan of officer Colony Mirpoor Abbottabad CNIC# 13202-2943373-1	27.12.088	Battagram	69	34	35.5	Ok	35	27	0	8	70	87	05	92	
14-	Qazi Izhar ul Haq S/O Qazi Adress of Battagram CNIC# 13202-3806277-1	1.10.091	Battagram	66	36	38	Ok	35	27	0	8	70	86	05	91	
15-	Faiz ur Rehman S/O Fazal ur Rehman of Rabat Kandwo Allai CNIC# 13201-3424353-5	2.3.094	Battagram	70	35	36.5	Ok	26	35	6		67	86	05	91	
16-	Nisar Ahmad S/O Zahir Muhammad of Roopkani Allai CNIC# 13201-6847627-3	26.2.095	Battagram	66.9	34	35.5	Ok	35	27	0		62	85.5	05	90.5	
17-	Tariq Aziz S/O Jamshed Khan of Kani Allai CNIC# 13201-5408446-9	1.4.094	Battagram	70	34	35.5	Ok	35	35	0		70	85.5	Absent	85.5	
18-	Wali ullah S/O Ghulam Muhammad of Battagram CNIC# 13202-2748333-5	8.5.094	Battagram	70.1	34	35.5	Ok	35	35	0		70	85.5	05	90.5	
19-	Muhammad Tasleem S/O Sardar of Neeli Shang CNIC# 13202-0373008-7	1.4.93	Battagram	71.8	35.5	38	Ok	35	35	0		70	84.5	05	89.5	
20-	Sharif ullah S/O Hayyullah of Kund Besham CNIC# 13201-0918552-5	17.5.091	Battagram	66	37	38.5	Ok	26	27	6		59	83.5	05	88.5	

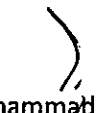
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21-	Iftikhar Ahmad S/O Gul Namrooz Khan of Gijbori CNIC# 13202-68771591-7	1.4.094	Battagram	66	34	36	Ok	35	27	6		68	83	05	88	
22-	Ikram ul Haq S/O Anwal ul Haq of Kakarshang CNIC# 13202-9474273-9	15.5.091	Battagram	67.9	35	36.5	Ok	26	27	6		59	81.5	05	86.5	
23-	Ahmad S/O Shah Alam Khan of Bansir CNIC# 13202-5913187-1	30.12.091	Battagram	70.3	36	38	Ok	26	27	6		59	81.5	05	86.5	
24-	Syed Sadam Hussain Shah S/O Syed Murtaza Shah of Biland Kot CNIC# 13202-6126802-7	14.3.092	Battagram	67.5	34	36	Ok	35	27	0		62	81	05	86	
25-	Ibrar Khan S/O Muhammad Zubair of Batamori CNIC# 13202-7108723-9	15.10.090	Battagram	68	40.5	42	Ok	26	27	6		59	80	05	85	

Note: seniority in the merit list prepared by NTS has been corrected at S.No. 13,14,17 and 18 in accordance to rules


(Muhammad Yousaf)
Divisional Forest Officer P/Squad
Representative of SO(Estt)
Govt of KPK FE&W Department
Member


Mr. Zafar Khan
Divisional Forest Officer
Hazara Tribal Forest Division
(Chairman)


(Muhammad Muzaffar)
Sub Divisional Forest Officer
Battagram Forest Sub Division
Battagram
Member

Attested


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Annexure-C
6 pages

(13)

SENIORITY LIST OF FOREST GUARD AS IT STOOD ON 14/12/2017 IN RESPECT OF HAZARA TRIBAL FOREST DIVISION BATTAGRAM

S.No	Name of Forest Guard	Father's Name	Home District	Qualification	Trained/un-trained	Date of Birth	Date of appointment/initial recruitment In Govt. Service	Present Grade	Remarks
1-	Fazal Rahim-I	Faizus	Battagram	Middle	-do-	22-03-1960	17-03-1979	08	-
2-	Ahmed Rizwan	Abdul Manan	Battagram	Middle	-do-	11-12-1959	02-04-1983	08	-
3-	Saeed-ur-Rehman	Ghulam Sarwar	Battagram	Middle	-do-	03-04-1961	13-06-1983	08	-
4-	Freen-ur-Rehman	Gul Samar	Battagram	Middle	-do-	05-01-1963	13-06-1983	08	-
5-	Abeedullah	Wazir Ahmed	Battagram	Middle	-do-	10-12-1963	09-08-1983	08	-
6-	Jumaraz	Gul Satbar	Battagram	Middle	-do-	15-03-1965	25-08-1983	08	-
7-	Zafar Ali Kher	Rustam Khan	Battagram	Matric	-do-	13-04-1965	01-10-1983	08	-
8-	Sherin Khan	Haroon Khan	Battagram	Matric	-do-	08-10-1960	03-10-1983	08	-
9-	Taza Gul	Sharab Khan	Battagram	Middle	-do-	01-01-1959	21-12-1983	08	-
10-	Mohammad Wakool	Abdul Wahim	Battagram	Matric	-do-	25-11-1959	22-02-1984	08	-
11-	Zarfaren	Jalandar	Battagram	Matric	-do-	09-10-1960	23-02-1984	08	-
12-	Mohammad Afzal	Jumaraz Khan	Battagram	Matric	-do-	01-01-1965	23-02-1984	08	-
13-	Dildar Mohammad	Faiz Khan	Mansehra	Matric	-do-	04-04-1965	23-02-1984	08	-
14-	Dilbar Khan	Ayyub Khan	Battagram	Matric	-do-	08-04-1965	02-05-1984	08	-
15-	Shah Nawaz	Faqir Mohammad	Mansehra	Matric	-do-	02-05-1960	14-04-1985	08	Transferred from W/Shed and reported arrival on 24-09-1986
16-	Said Hassan Shah	Noor Nabi Shah	Battagram	Matric	-do-	01-01-1962	07-12-1989	08	-
17-	Mohammad Anwar	Faiz ullah	Battagram	Matric	-do-	07-01-1966	07-12-1989	08	-
18-	Obaidullah	Mohammad Zareen	Battagram	Matric	-do-	08-03-1967	09-12-1989	08	-
19-	Akhtar Javed	Sarfraz Khan	Battagram	F.A	-do-	05-05-1967	07-12-1989	08	-
20-	Iqbal Mohammad Khan	Mohammad Khan	Battagram	Matric	-do-	01-01-1962	09-07-1981	08	Transferred from W/Shed and reported arrival on 19-02-1991
21-	Mohammad Pervez	Abdullah Jan	Battagram	Matric	-do-	03-03-1963	16-07-1985	08	Transferred form W/Shed and reported arrival on 07-06-1993
22-	Mohammad Iqbal	Mohammad Malook	Battagram	Matric	-do-	01-01-1975	09-11-1993	08	-
23-	Nisar Mohammad	Mohammad Ilyas Khan	Battagram	B.A	-do-	18-04-1976	26-07-1994	08	-
24-	Shams-ud-Din	Mohammad Maskeen	Mansehra	Middle	-do-	01-01-1961	03-01-1979	08	Transferred from W/Shed and reported arrival on 20/11/2002
25-	Tayyab Shah	Noor Nabi Shah	Battagram	Matric	-do-	04-04-1983	20-03-2007	08	-

Attested
H. J. [Signature]

26-	Atta -ur- Rehman	Attai Khan	Battagram	Matric	-do-	12-03-1968	07-11-2008	08	-
27-	Saif -ur- Rehman	Mir Ahmed	Abbottabad	Matric	-do-	10-06-1965	20-11-1984	08	-
28-	Asif Nawaz	Sherin	Battagram	Matric	-do-	10-04-1987	30-04-2009	08	Joined HTFD, on 08/4/2009.
29-	Jamshaid	Muhammad Farid Khan	Battagram	Middle	-do-	11-11-1961	09-01-1984	08	-
30-	Sardar Ali Shah	Said Malook Shah	Battagram	Matric	-do-	01-03-1975	26-11-2012	08	Transferred from Agror Tanawal Forest Division Mansehra reported arrival on 18/06/2010
31-	Abu Hanif	Ghulam Dawood	Battagram	FSC	-do-	26-06-1990	10-10-2013	08	-
32-	Rustam Khan	Jnaser	Battagram	Matric	-do-	20-02-1969	30-01-2014	08	-
33-	Ibrar Hussain Shah	Hussan Nawab Shah	Battagram	Matric	-do-	01-04-1976	29-02-1996	08	-
34-	Saifullah	Rustam Khan	Battagram	B.A	Un trained	10-03-1991	07-11-2016	08	Joined HTFD on 20/08/2013 and not yet completed the lien of 3 years
35-	Tariq Aziz	Gulbar Khan	Battagram	BSc	-do-	12-01-1995	07-11-2016	08	-
36-	Shahid Akbar	Muhammad Aseem	Battagram	M.A	-do-	31-01-1992	07-11-2016	08	-
37-	Sheryar Khan Niazi	Niaz Muhammad Khan Niazi	Battagram	BSc	-do-	05-04-1993	07-11-2016	08	-
38-	Syed Harunad Ali Shah	Syed Amir Afsar Shahi	Battagram	B.Com.	-do-	12-04-1989	07-11-2016	08	-
39-	Farmanullah	Umer Sharif	Battagram	BSc	-do-	01-01-1994	07-11-2016	08	-
40-	Naveed	Muhammad Waheed	Battagram	FSc	-do-	14-03-1994	07-11-2016	08	-
41-	Naeem ul Hadi	Muhammad Irshad	Battagram	M.A	-do-	12-12-1992	07-11-2016	08	-
42-	Attaullah	Aurangzeb	Battagram	M.A	-do-	07-03-1989	07-11-2016	08	-
43-	Ahmed Saeed Khan	Muhammad Parviaz Khan	Battagram	DAE	-do-	10-03-1996	07-11-2017	08	-
44-	Muhammad Saeed Khan	Ghulam Ghous	Battagram	HSSC	-do-	13-08-1996	07-11-2016	08	-
45-	Fazal Rabi	Faqeer Muhammad	Battagram	M.A	-do-	11-11-1990	07-11-2016	08	-
46-	Noshad Zaib Khan	Aurangzeb Khan	Battagram	M.A	-do-	27-12-1988	07-11-2016	08	-
47-	Qazi Izhar ul Haq	Qazi Adress	Battagram	M.A	-do-	01-10-1991	07-11-2016	08	-
48-	Faiz-ur-Rehman	Fazal ul Rehman	Battagram	BSc	-do-	02-03-1994	06-12-2016	08	-
49-	Zeenat ullah	Said Fareen	Battagram	M.A	-do-	20-12-1992	20-11-2017	08	-

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50-	Ikramullah	Noor Hussain	Battagram	HSSC	-d-	26-01-1997	20-11-2017	08	-
51-	Sharifullah	Hayyullah	Battagram	M.A	-d-	17-05-1991	20-11-2017	08	-
52-	Tariq Kamal	Mustafa Kamal	Battagram	B.A	-d-	05-01-1990	20-11-2017	08	-
53-	Shehzad Ahmad	Sharab Khan	Battagram	FSc	-d-	19-10-1995	20-11-2017	08	-

No 3284-80 /GE, dated 14/12/2017

Copy forwarded to the:-

- 1- Conservator of Forests, Upper Hazara Forest Circle Mansehra for information.
- 2- All SDFOs/RO in Hazara Tribal Forest Division for information & necessary action. They are directed to circulate the Seniority list among the Forest Guards of their Jurisdiction for scrutiny and direct them to furnish their observation, if any within one week from the receipt of seniority list to this official for further course of action.

[Signature]
 DIVISIONAL FOREST OFFICER
 HAZARA TRIBAL FOREST DIVISION
 BATTAGRAM

Divisional Forest Officer
 Hazara Tribal Forest Division
 Battagram

Attest
[Signature]

They will be governed by the rules with initial attendance etc as they belong to which they belong.

the rules with initial

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FINAL SENIORITY LIST OF FOREST GUARD AS IT STOOD ON 31/03/2023 IN RESPECT OF HAZARA TRIBAL FOREST DIVISION BATTAGRM

S.No	Name of Forest Guard	Father's Name	Home District	Qualification	Trained/un-trained	Date of Birth	Date of appointment/ initial recruitment In Govt: Service	Present Grade	Remarks
1	Sardar Ali Shah	Said Malook Shah	Battagram	Matric	-do-	01-03-1975	26-11-2012	08	-
2	Abu Hanif	Ghulam Dawood	Battagram	FSC	-do-	26-06-1990	10-10-2013	08	-
3	Rustam Khan	Janaser	Battagram	Matric	Un-Trained	20-02-1969	30-01-2014	08	-
4	Saifullah	Rustam Khan	Battagram	M.A	Trained	10-03-1991			
5	Tariq Aziz	Gulbar Khan	Battagram	BSc	Trained	12-01-1995	07-11-2016	08	-
6	Shahid Akbar	Muhammad Aseem	Battagram	M.A	Un-Trained	31-01-1992	07-11-2016	08	-
7	Sheryar Khan Niazi	Niaz Muhammad Khan Niazi	Battagram	BSc	-do-	05-04-1993	07-11-2016	08	-
8	Syed Hammad Ali Shah	Syed Amir Afsar Shah	Battagram	B.Com	Trained	12-04-1989	07-11-2016	08	-
9	Farmanullah	Umer Sharif	Battagram	BSc	Un-Trained	01-01-1994	07-11-2016	08	-
10	Naeem ul Hadi	Muhammad Irshad	Battagram	M.A	-do-	12-12-1992	07-11-2016	08	-
11	Attaullah	Aurangzeb	Battagram	M.A	-do-	07-03-1989	07-11-2016	08	-
12	Ahmed Saeed Khan	Muhammad Parviaz Khan	Battagram	DAE	-do-	10-03-1996	07-11-2016	08	-
13	Muhammad Saeed Khan	Ghulam Ghous	Battagram	HSSC	-do-	13-08-1996	07-11-2016	08	-
14	Fazal Rabi	Faqeer Muhammad	Battagram	M.A	-do-	11-11-1990	07-11-2016	08	-
15	Noshad Zaib Khan	Aurangzeb Khan	Battagram	M.A	-do-	27-12-1988	07-11-2016	08	-
16	Faiz-ur-Rehman	Fazal ul Rehman	Battagram	BSc	-do-	02-03-1994	06-12-2016	08	-
17	Ikramullah	Noor Hussain	Battagram	HSSC	-do-	26-01-1997	20-11-2017	08	-
18	Sharifullah	Hayyullah	Battagram	M.A	-do-	17-05-1991	20-11-2017	08	-
19	Tariq Kamal	Mustafa Kamal	Battagram	B.A	-do-	05-01-1990	20-11-2017	08	-
20	Shehzad Ahmad	Sharab Khan	Battagram	FSc	-do-	19-10-1995	20-11-2017	08	-
21	Rizwanullah	Bara Khan	Battagram	B.A	-do-	01-01-1995	01-03-2019	08	-

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22	Muhammad Zubair	Saleem Khan	Battagram	BS	Trained	15-03-1993	04-03-2019	08	-
23	Bilal Mirza	Mirza Khan	Battagram	MSc	-do-	26-01-1995	31-12-2018	08	-
24	Salah-ud-Din	Sarbiland Khan	Battagram	B.A	-do-	02-02-1999	05-10-2021	08	-
25	Tariq Ahmad	Ghulam Haqani	Battagram	B.A	-do-	10-10-1993	05-10-2021	08	-
26	Shahbaz Khan	Jan Muhammad	Battagram	B.A	-do-	01-01-1996	05-10-2021	08	-
27	Irfan ullah	Rahim Khan	Battagram	FSc	-do-	12-03-2000	05-10-2021	08	-
28	Ameer Saeed	Saeed Akhtar	Battagram	FSc	-do-	04-10-2000	05-10-2021	08	-
29	Muhammad Fawad	Muhajarin	Battagram	FSc	-do-	20-05-1999	05-10-2021	08	-
30	Abdullah	Umar Khan	Battagram	FSc	-do-	25-07-1997	05-10-2021	08	-
31	Ejaz Ahmad	Umar Ghani	Battagram	FSc	-do-	04-03-2000	05-10-2021	08	-
32	Hamid Ali Shah	Muhammad Zahir Shah	Battagram	FSc	-do-	20-05-1998	05-10-2021	08	-
33	Imran Shah	Mian Afsar Shah	Battagram	FSc	-do-	08-10-1997	05-10-2021	08	-
34	Sohail Khan	Banaras Khan	Battagram	FSc	-do-	25-06-1998	05-10-2021	08	-
35	Behrullah	Faiz-ur-Rehman	Battagram	FSc	-do-	05-08-1994	05-10-2021	08	-
36	Shah Fahad Muhammad Khan	Taj Muhammad Khan	Battagram	M.A	-do-	10-05-1992	10-06-2022	08	-
37	Ghani Rahman	Abdul Qayum	Battagram	FSc	-do-	03-01-1998	10-06-2022	08	-
38	Abdur Rahman	Riaz	Battagram	FSc	-do-	02-02-1997	10-06-2022	08	-
39	Ubaid Ullah	Usman Zareen	Battagram	FSc	-do-	04-01-1994	10-06-2022	08	-
40	Muhammad Arsalan	Muhammad Naeem	Battagram	FSc	-do-	05-02-2000	10-06-2022	08	-
41	Muhammad Usman	Husnus Sawab	Battagram	FSc	-do-	11-03-2002	10-06-2022	08	-
42	Azmat Shuaib	Muhammad Shuaib Khan	Battagram	FSc	-do-	18-12-1997	10-06-2022	08	-
43	Muhammad Riaz	Mukhtiyar Muhammad	Battagram	FSc	-do-	30-07-1998	10-06-2022	08	-
44	Junaid Shoaib	Muhammad Shoaib	Battagram	FSc	-do-	23-08-1998	10-06-2022	08	-
45	Muhammad Zakir	Sharif ullah	Battagram	FSc	-do-	15-08-2022	10-06-2022	08	-
46	Saeedullah	Muhammad Alam	Battagram	FSc	-do-	20-05-2000	10-06-2022	08	-
47	Rooh Ullah	Hafeez Ullah	Battagram	FSc	-do-	04-06-2002	10-06-2022	08	-
48	Imran Khan	Taj Muhammad	Battagram	FSc	-do-	25-01-2001	10-06-2022	08	-
49	Adil Anwar	Aimal Khan	Battagram	FSc	-do-	05-03-2002	10-06-2022	08	-
50	Usama Naz	Naz Muhammad	Battagram	FSc	-do-	08-08-1999	10-06-2022	08	-

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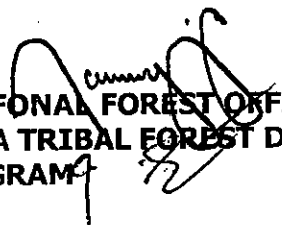
51	Izaz Ur Rehman	Ahsan Ur Rehman	Battagram	FSc	-do-	13-08-2000	10-06-2022	08	-
52	Abubakar Siddique	Ghulam Yousaf	Battagram	FSc	-do-	01-04-1999	10-06-2022	08	-
53	Abid Hussain	Khista Jan	Battagram	M.A	-do-	27-08-1995	10-06-2022	08	-
54	Syed Sajjad Hussain Shah	Abdul Tawab Said	Battagram	FSc	-do-	15-03-1997	10-06-2022	08	-
55	Toqeer Saraj	Muhammad Saraj	Battagram	FSc	-do-	27-01-1994	10-06-2022	08	-


No 3284-85 /GE,

dated 31 /03/2023

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- 2- All SDFOs//RO in Hazara Tribal Forest Division for information & necessary action.



DIVISIONAL FOREST OFFICER
HAZARA TRIBAL FOREST DIVISION
BATTAGRAM

Attested


AUTHORITY LETTER

Mr. Muhammad Zakir Khan Sub-Divisional Forest Officer of Hazar Tribale Forest Division Battagram is authorized to attend the Khyber Pakhtunkhwa service tribunal and submit the para-wise comments furnished by the respondents in service Appeal No. 1129/23 before the honorable Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of the Undersigned.

Respondent No. 4


Sadar Muhammad Saleem
DIVISIONAL FOREST OFFICER
HAZRA TRIBAL FOREST DIVISION
BATAGRAM