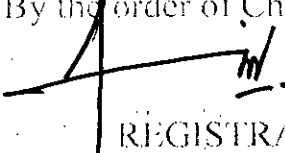


FORM OF ORDER SHEET

Court of _____

Appeal No. 99/2024

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	09/01/2024	The appeal of Syed Asad Ali received today by registered post through Mr. Muhammad Arshad Khan Tonoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A. Abad on _____
		By the order of Chairman  REGISTRAR

**BEFORE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 99 /2024

Syed Asad Ali Shah Girdwar Revenue, at Circle Bagan District Abbottabad.

...APPELLANT

VERSUS

Govt. of KP through SMBR, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

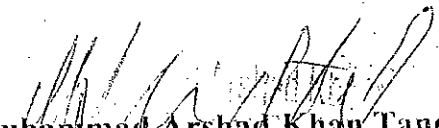
INDEX


S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 10	
2.	Copy of posting order dated 24/03/2016	11	"A"
3.	Copy of order dated 25/11/2021	12	"B"
4.	Copy of the seniority list of the Patwaris dated 31/12/2022	13-16	"C"
5.	Copy of departmental appeal	17-18	"D"
6.	Copy of seniority list of Girdawar in the Settlement Department	19	"E"
7.	Copy of promotion order of the appellant as Girdawar	20	"F"
8.	Wakalatnama	21	


...APPELLANT

Dated: _____ /2024

Through


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&

(Muhammad Ibrahim Khan)
Advocate High Court, Abbottabad

1

**BEFORE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 99 /2024

Syed Asad Ali Shah Girdwar Revenue, at Circle Bagan District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of KP through SMBR, Khyber Pakhtunkhwa, Peshawar.
2. Commissioner Hazara Division, Abbottabad.
3. Deputy Commissioner District Abbottabad.
4. Director Land Record Khyber Pakhtunkhwa, Peshawar.
5. Settlement Officer, Tehsil Havelian.

...RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974 FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT WAS POSTED AGAINST THE
POST OF FIELD KANUNGO BY
RESPONDENT NO.3 IN THE OFFICE OF
RESPONDENT NO.5. THE APPELLANT WAS
REGULARLY PROMOTED AS FIELD**

KANUNGO IN BPS-11 BY RESPONDENT NO.5
VIDE PROMOTION ORDER DATED
24/03/2016. THAT RESPONDENT NO.3
ILLEGALLY REPATRIATED THE
APPELLANT FROM SETTLEMENT
DEPARTMENT TO THE REVENUE
DEPARTMENT VIDE ORDER DATED
25/11/2021 AND THEREAFTER, THE NAME
OF THE APPELLANT WAS PLACED IN THE
LIST OF PATWARIS INSTEAD OF
GIRDAWARS VIDE IMPUGNED SENIORITY
LIST DATED 31/12/2022 THE APPELLANT
WAS SERVING AS GIRDAWAR/FILED
KANUNGO IN SETTLEMENT DEPARTMENT
W.E.F 24/03/2016 .THE REPATRIATION OF
THE APPELLANT FROM SETTLEMENT
DEPARTMENT TO REVENUE DEPARTMENT
AND PLACING THE APPELLANT IN THE
LIST OF PATWARIS IN THE REVENUE
DEPARTMENT IS ILLEGAL, PERVERSE,
DISCRIMINATORY AND THE APPELLANT IS
TO BE PLACED IN THE SENIORITY OF
GIRDAWAR W.E.F 24/03/2016 IN THE
REVENUE DEPARTMENT OR REPATRIATED

IN SETTLEMENT DEPARTMENT AS
GIRDAWAR/FIELD KANUNGO.

PRAYER:- ON ACCEPTANCE OF THE
INSTANT SERVICE APPEAL RESPONDENTS
MAY KINDLY BE DIRECTED TO:-

1. DELETE NAME OF THE APPELLANT AT
SERIAL NO. 8 OF IMPUGNED SENIORITY
LIST DATED 31/12/2022 OF THE
PATWARIES AND INCLUDE THE NAME
OF THE APPELLANT IN THE SENIORITY
LIST OF GIRDAWARS W.E.F 24/03/2021 IN
THE REVENUE DEPARTMENT.
 2. WITHDRAW REPATRIATION ORDER
DATED 25/11/2021 AND POST THE
APPELLANT IN THE SETTLEMENT
DEPARTMENT AS FILED QANOON GO AS
PER SENIORITY LIST OF SETTLEMENT
DEPARTMENT DATED 24/03/2021. ANY
OTHER RELIEF WHICH THIS
HONOURABLE TRIBUNAL DEEMS FIT
AND APPROPRIATE IN THE
CIRCUMSTANCES OF CASE MAY ALSO
BE GRANTED TO THE APPELLANT.
-

Respectfully Sheweth:-

That the facts forming the back grounds of the instant service appeal are arrayed as under:-

1. That the appellant got appointment as patwari in the revenue department on 01/09/2003. The appellant has served the respondents' department with due diligence and the entire satisfaction of his high ups.
2. That the appellant was posted/appointed in the settlement department as filed Kanungo in BPS-11. Copy of posting order dated 24/03/2016 is annexed as Annexure "A".
3. That as per posting/transfer order dated 24/03/2016 issued by respondent No.3 in settlement department as Field Kanungo, it was mentioned in it that the post will not be transferable to revenue side but after rendering services as Settlement Filed KANUNGO w.e.f 24/03/2016, he has been repatriated from settlement department to

Revenue Department vide order dated 25/11/2021. Copy of order dated 25/11/2021 is annexed as Annexure "B".

4. That the name of the appellant was to be placed in the seniority list of Girdawar but the appellant's name has been placed at serial No.8 of the seniority list of the Patwaris issued by respondents' department on 31/12/2022. The appellant received the impugned seniority list dated 31/12/2022 on 21/08/2023. Copy of the seniority list of the Patwaris dated 31/12/2022 is annexed as Annexure "C".

5. That the appellant submitted departmental appeal to the next higher authorities to the extent that either his name may be included in the list of Girdawars in the revenue department or may be repatriated in the settlement department as Filed Kanungo. Copy of departmental appeal is annexed as Annexure "D". Hence, feeling aggrieved the instant service appeal is filed inter-alia on the following grounds amongst others;-

GROUND:

- a. That the appellant was absorbed in settlement department and subsequently promoted as Girdawar/Kanungo in said department and thereafter, issued seniority list of Patwrai/Kanungo of the settlement department and the appellant is placed at serial No. 3 of the list. Copy of seniority list of Girdawar in the Settlement Department is annexed as Annexure "E".
- b. That as per law, transferred employees of revenue department to the settlement department can be absorbed in the settlement department on regular basis. Once, the appellant was absorbed and got promoted as Girdawar/Kanungo on regular basis in the settlement department, the appellant can not be repatriated from

the settlement department to the revenue department.

c. That respondent No.03 repatriated the appellant from the settlement department to the revenue department and the appellant was to be placed in the list of Girdawars instead of Patwaris. Hence, the act of the respondents' department is illegal and the same is liable to be set-aside.

d. That the appellant was promoted from the post of Patwari to the post of Girdawar in revenue department vide promotion order dated 22/03/2023 which should have been from the date as Naib Tehsildar of regular promotion because the appellant was serving as Girdawar in the settlement department. Copy of promotion order of the appellant as Girdawar is annexed as Annexure "1".

- e. That the matter relates to the terms and condition of service, therefore, the Honourable Tribunal has jurisdiction to entertain the service appeal.
- f. That the instant service appeal is being filed well within the period of limitation.
- g. That the valuable rights of the appellant are involved.
- h. That other points shall be urged at the time of arguments.

It is therefore, humbly prayed that on acceptance of the instant service appeal respondents may kindly be directed to;-

1. Delete name of the appellant at serial no. 8 of impugned seniority list dated 31/12/2022 of the patwaries and include the name of the appellant in the seniority list of girdawars w.e.f 24/03/2021 in the revenue department.

2. Withdraw repatriation order dated 25/11/2021 and post the appellant in the settlement department as filed qanoon go as per seniority list of settlement department dated 24/03/2021. Any other relief which this Honourable Tribunal deems fit and appropriate in the circumstances of case may also be granted to the appellant.



...APPELLANT

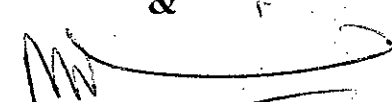
Through

Dated: _____/2024



(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

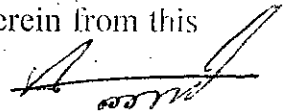
&



(Muhammad Ibrahim Khan)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

**BEFORE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____/2024

Syed Asad Ali Shah Girdwar Revenue, at Circle Bagan District Abbottabad.

...APPELLANT

VERSUS

Govt. of KP through SMBR, Khyber Pakhtunkhwa, Peshawar and others.

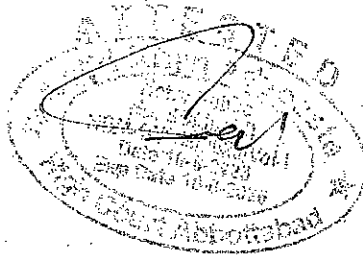
...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Syed Asad Ali Shah Girdwar Revenue, at Circle Bagan District Abbottabad*, do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


DEPONENT



08/01/2024



**OFFICE OF THE SETTLEMENT
OFFICER ABBOTTABAD**

No.DPC/DSC/2015-16/ 9786-60 /SO/ATD
Dated Abbottabad the; 24 / 03 /2016

P-11

OFFICE ORDER:

Annex - A

In exercise of the powers conferred upon me under Notification No.1982/Estt:I/135/SSRC dated 23-01-2015 read with Rule 2 (b) of West Pakistan Northern Zone Patwar Subordinate Service Rules 1963 and w/r to the minutes of the meeting regarding promotion of the staff in Settlement Operation circulated vide No.1468-73/Settl dated 18/11/2009 and subject to the recommendation of Departmental Promotion/Selection Committee in its meeting held on 16th March, 2016, Mr.Asad Ali Shah S/O Syed Sarwer Shah, Patwari (BPS-09) in Revenue Administration, Abbottabad is hereby appointed as Settlement Field Kanungo (BPS-11) on promotion basis against the vacant post in the Settlement Operation, Tehsil Havelian, Abbottabad on contract basis. His promotion will be effective within the Settlement Project/Operation Abbottabad.

TERMS AND CONDITIONS:

- i. The post will not be transferable to revenue side.
- ii. His appointment/transfer/promotion in the Settlement Operation is solely on contract basis and for the purpose of Settlement only.
- ← iii. The post will be on temporary/Contract basis and can be terminated/rewarded by the Competent Authority as and when desired.
- iv. The post will be filled in purely on temporary/contract basis on usual terms and conditions of contract policy.
- v. The post is likely to be continued on temporary contract basis and can be renewed on satisfactory performance of the incumbent.

Lahore
**SETTLEMENT OFFICER
ABBOTTABAD**

Endst: No. & Date Even.

Copy to the;

1. Director Land Records, Khyber Pakhtunkhwa, Peshawar
2. Secretary, Board of Revenue, Khyber Pakhtunkhwa, Peshawar
3. Deputy Commissioner, Abbottabad
4. District Accounts Officers, Abbottabad
5. Official Concerned.

Attested

[Signature]

Lahore
**SETTLEMENT OFFICER
ABBOTTABAD**

Annex-B

P-12

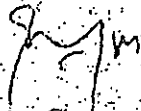


OFFICE OF THE
DEPUTY COMMISSIONER
ABBOTTABAD

No. 7241-20/ACR/03
Dated 25/11/2021

ORDER:

The services of Mr. Asad Ali Shah Patwari of this office earlier placed at the disposal of Settlement officer Abbottabad is hereby withdrawn with immediate effect and the Patwari concerned is directed to report in his parent office forthwith for further posting.


Deputy Commissioner
Abbottabad


Encls: No. & Date Even:

Copy forwarded to the:-

1. Director Land Records, Khyber Pakhtunkhwa, Peshawar.
2. Additional Deputy Commissioner, Abbottabad.
3. Assistant Commissioner, Abbottabad.
4. Settlement Officer, Abbottabad.
5. Additional Assistant Commissioner (Revenue), Abbottabad.
6. Tehsildar Abbottabad.
7. Official concerned for compliance.


Deputy Commissioner
Abbottabad





FINAL SENIORITY LIST OF PATWARIES AS STOOD ON 31.12.2022 OF ABBOTTABAD DISTRICT


S.No	Name of Patwarl	Qualification	Date of Entry Into Candidate Register of Patwarlan	Date of Birth	Date of appointment	Kanungo Exam: Passed/ Failed/ Not Appeared
1.	Hamayun Khan S/o Mehboob Khan	Matric	03-09-1985	08-05-1964	29-08-1997	Not passed
2.	Tahir Farooq S/o Qazi Muhammad Azam	F.A	30-12-1985	04-07-1964	12-09-1997	Not passed
3.	Ayaz S/O Ali Zaman	Matric	30-12-1985	08-01-1963	03-07-2001	Not passed
4.	Muhammad Hanif s/o Yousaf Khan	B.A	17-07-1997	03-05-1971	04-07-2001	Passed in year 2022
5.	Abdul Rauf Khan s/o Jhandad Khan	B.A	17-07-1997	10-05-1974	04-07-2001	Passed
6.	Javed s/o Abdul Rehman	Matric	30-12-1985	20-02-1967	18-06-2003	Not passed
7.	Ilyas Khan s/o Akram Khan	Matric	11-05-1986	10-04-1964	18-06-2003	Passed
8.	Syed Asad Ali Shah S/o Syed Sarwar Shah	B.A	17-07-1997	10-04-1974	01-09-2003	Passed
9.	Adil Nawaz s/o Nawaz Khan	F.A	17-07-1997	04-05-1974	01-09-2003	Passed
10.	Naheed Gul s/o Abdul Waheed	B.A	17-07-1997	04-05-1974	01-09-2003	Passed
11.	Akhlaq Ahmed s/o Abdul Rasheed	F.A	17-07-1997	06-04-1973	01-09-2003	Not passed
12.	Shafique Ahmed s/o Gul Zaman	MSC Pak.Studies	17-07-1997	21-04-1973	01-09-2003	Passed in year 2022
13.	Muhammad Sajjad s/o M. Farid Khan	F.A	17-07-1997	25-04-1976	01-09-2003	Passed
14.	Iftikhar Khan S/o Ali Bahadur Khan	F.A	17-07-1997	01-02-1973	01-04-2005	Passed in year 2022
15.	Mumtaz Khan s/o Anwar Khan	B.A	17-07-1997	15-05-1976	01-04-2005	Passed in year 2022
16.	Muhammad Banaris s/o Ghulam Farid	F.A	05-11-1997	03-03-1975	01-04-2005	Passed
17.	Jaber Khan S/o M. Afzal Khan	F.A	05-11-1997	16-03-1976	01-04-2005	Passed
18.	Tanveer S/o Muhammad Ayub	F.A	28.02.1999	01.01.1974	01-04-2005	Passed
19.	Faisal Khan s/o Jhangeer Khan	F.A	30-08-2000	22-06-1977	01-04-2005	Passed in year 2022
20.	Baber Rehman Qureshi s/o Abdul Rehman Qureshi	B.A	11-12-2003	31-12-1975	01-04-2005	Passed
21.	Shahid Khan s/o Munshi Khan	F.A	30-08-2000	04-01-1976	08-08-2005	Passed
22.	Mehboob s/o Naseem	B.A	30-08-2000	02-04-1973	01-11-2006	Passed
23.	Sajad Ahmed s/o Muhammad Nawaz Khan	B.A	11-12-2003	13-04-1976	06-12-2006	Passed in year 2022
24.	Zeeshan Jadoon s/o Fida Muhammad	B.A	11-12-2003	14-10-1981	18-12-2006	Passed
25.	Ajmal Khan s/o Mir dad Khan	F.A	11-12-2003	01-01-1978	03-04-2007	Not passed
26.	Ghulam Khasro s/o Muhammad Mumtaz Khan	B.A	11-12-2003	09-11-1978	21-09-2007	Not passed
27.	Amir Shahzad s/o Fazal Rehman	B.A	11-12-2003	12-09-1981	21-09-2007	Not passed
28.	Rashid Hameed S/o Abdul Hameed	B.A	11-12-2003	29-11-1981	21-09-2007	Passed

No.	Name of Patwari	Qualification	Date of Entry into Candidate Register of Patwarian	Date of Birth	Date of Appointment	Result/Status
29.	Muhammad Niaz s/o Lal Khan	F.A	11-12-2003	20-03-1983	22-11-2007	Passed
30.	Shoaib s/o Hamayon Khan	B.A	12-03-2005	24-04-1981	22-11-2007	Passed
31.	Ishtiaq Khan s/o Sarang Khan	B.A	12.03.2005	02-04-1980	22-11-2007	Passed
32.	Sardar Jhangeer s/o Sardar Gul Nawaz	B.A	21-09-2006	12-12-1984	22-11-2007	Passed
33.	Muhammad Khalil s/o Kala Khan	F.A	12-03-2005	10-12-1981	17-12-2009	Not Passed
34.	Muhammad Sajid s/o M. sadiq	B.A	21-09-2006	06-03-1981	17-12-2009	Passed
35.	Sajid Mehmood s/o Khoidad Khan	B.A	21-09-2006	01-01-1983	17-12-2009	Passed
36.	Asim Shahzad s/o Allah Dad	B.A	21-09-2006	14-05-1985	17-12-2009	Not Passed
37.	Fartamoz S/o Essa Khan	B.A	21-09-2006	01-07-1985	17-12-2009	Passed
38.	Shakir Hussain S/o Sabir Hussain	F.A	14-04-2008	13-06-1988	17-12-2009	Not Passed
39.	Waseem Khan s/o Walistan Khan	F.A	21-09-2006	05-11-1978	01-12-2010	Not Passed
40.	Tanveer Hussain s/o Muhammad Yaqoob	D.Com	21-09-2006	27-03-1981	01-12-2010	Passed
41.	Safeer Ahmed S/o Abdul Rasheed	F.A	21-09-2006	08-04-1985	01-12-2010	Not Passed
42.	Nisar Aziz s/o Aziz-u-Rehman	B.A	22-03-2007	03-02-1983	01-12-2010	Passed
43.	Faisal Afsar S/o M. Afsar	B.A	14-04-2008	17-03-1985	01-12-2010	Passed
44.	Waqar Ali S/o Abdul Mateen Khan	B.A	14-04-2008	12-03-1981	01-12-2010	Passed
45.	Waqas Khan S/o Gul Muhammad Khan	F.A	14-04-2008	22-04-1987	01-12-2010	Passed
46.	Dil Afsar s/o Muhammad Daud	F.A	14-04-2008	05-02-1982	01-12-2010	Passed
47.	Yasir Khan s/o Liaqat Khan	B.A	04-12-2010	13-03-1983	01-12-2010	Not passed
48.	Muhammad Asif S/o Habib ur Rehman	B.A	14-04-2008	01-01-1982	21-12-2011	Passed
49.	Hammad Ali S/o Aurangzeb Khan	F.A	14-04-2008	02-04-1989	14-06-2012	Passed in year 2022
50.	Ajmal Khan S/o Pervez Khan	B.A	14-04-2008	04-08-1987	14-06-2012	Passed
51.	Shah Murad S/o Niaz Hussain	B.A	14-04-2008	03-07-1983	14-06-2012	Passed in year 2022
52.	Tahir Jameel S/o Sher Ahmed Khan	B.A	14-04-2008	25-12-1982	14-06-2012	Passed
53.	Nasir Khan S/o Anwar Khan	F.A	14-04-2008	15-12-1978	14-06-2012	Not passed
54.	Murad Khan S/o Zirdad Khan	F.A	13-03-2010	17-12-1986	14-06-2012	Passed in year 2022
55.	Saqib S/o Mir Afzal	B.A	13-03-2010	15-07-1979	14-06-2012	Not passed
56.	Waseem Gul S/O Walayat Khan	B.A	13.03.2010	03-03-1988	14-10-2015	Passed in year 2022
57.	Saqib Sohail S/O Mohammad Afsar	F.A	13.03.2010	01-06-1982	14-10-2015	Not passed
58.	Muhammad Afsar S/o M. Daud	B.A	13.03.2010	01.01.1986	14-10-2015	Passed in year 2022
59.	Mohammad Riasat S/O M. Younis	F.A	13.03.2010	07-03-1982	14-10-2015	Passed in year 2022

[Handwritten signature]

Name of Patwari	Qualification	Date of Entry into Candidate Register of Patwarian	Date of Birth	Date of appointment	Kanungo Exam: Passed/ Failed/ Not Appeared
60. Asim Nawaz S/O Muhammad Nawaz	M.A	13.03.2010	07-09-1990	14-10-2015	Passed
61. Shahid Nawaz S/o Shah Nawaz	B.A	13.03.2010	02.02.1986	14-10-2015	Passed
62. Amjad Khan S/o M.Banaras Khan	B.A	13.03.2010	16.03.1986	14-10-2015	Not passed
63. Ehsan Khan S/O Sultan Bakhat	F.A	13.03.2010	15-01-1986	14-10-2015	Not passed
64. Touqeer Ahmed S/O Muhammad Riz	F.A	13.03.2010	16-01-1982	14-10-2015	Not passed
65. Waqas Nawaz S/O M. Nawaz	B.A	13.03.2010	28-11-1984	14-10-2015	Passed
66. Mohammad Shakir S/O M. Rafique	B.A	13.03.2010	02-03-1985	14-10-2015	Passed
67. Nasir Khan S/O Ahwal Khan	B.A	13.03.2010	15-03-1985	14-10-2015	Passed in year 2022
68. Qaiser Mehmood S/o M.Suleman	F.A	13.03.2010	27.07.1982	07-01-2016	Passed in year 2022
69. Qazi Muhammad Sajjad S/o Qazi Zardad	F.A	13.03.2010	05.10.1982	07-01-2016	Not passed
70. Mohammad Yasin S/o M. Miskeen	F.A	13.03.2010	10.02.1984	07-01-2016	Passed in year 2022
71. Yasir Imtiaz S/o Rawal Imtiaz	F.A	13.03.2010	10.04.1989	07-01-2016	Passed in year 2022
72. Sakhi Sultan S/o Rafi Sultan	B.A	13.03.2010	10.04.1989	07-01-2016	Passed in year 2022
73. Fawad Ali S/o Aurangzeb	F.A	13.03.2010	08.08.1986	07-01-2016	Not passed
74. Zeeshan Ashraf S/o M.Ashraf	B.A	13.03.2010	13.04.1987	07-01-2016	Not passed
75. Waqas Khan S/o Hamayun Khan	B.A	13.03.2010	04.03.1987	07-01-2016	Not passed
76. Nasir Nazeer Abbasi S/o Nazir Ahmed Abbasi	FA	13.03.2010	01.02.1981	02.06.2016	Passed in year 2022
77. Anzer Sultan S/o Mir Afzal	F.A	13.03.2010	05.12.1984	02.06.2016	Not passed
78. Hanif Gul S/o Gul Hassan Abbasi	B.A	13.03.2010	12.03.1989	02.06.2016	Passed in year 2022
79. Waqar Hussain S/o Manzoor Hussain	F.A	13.03.2010	12.12.1979	02.06.2016	Passed in Year 2022
80. Qazi Kaleem S/o Qazi Muhammad Naeem Asif	F.A	13.03.2010	05.06.1985	02.06.2016	Not passed
81. Adil Mansoor Khan S/o Shamarez Khan	F.A	13.03.2010	05.19.1985	25.10.2016	Passed in year 2022
82. Syed Bilal Hussain Shah S/o Syed Naqeeb Hussain Shah	F.A	13.03.2010	15.04.1981	25.10.2016	Not passed
83. Muhammad Liaquat S/o Fazal ur Rehman R/o Dalola	F.A	13.03.2010	02.03.1985	10.01.2018	Not passed
84. Khurram Naqvi S/o Nazeer Hussain Shah R/o Havelian	F.A	13.03.2010	20.08.1988	10.01.2018	Not passed
85. Imran Khan S/o Faridoon Khan	F.A	13.03.2010	20.03.1981	09.04.2018	Passed in year 2022
86. Muhammad Shiraz S/o Muhammad Anwar	F.A	13.04.2018	03.04.1986	18.01.2021	Passed
87. Aftab Suleman S/o Muhammad Suleman	F.A	13.04.2018	24.05.1985	18.01.2021	Passed in year 2022

No.	Name of Patwari	Qualification	Date of Entry into Candidate Register of Patwarian	Date of Birth	Date of appointment	Kanungo Exam: Passed/ Failed/ Not Appeared
88.	Umad Gul Khan Jadoon S/o Nazar Gul Khan	BSC	13.04.2018	07.12.1985	18.01.2021	Not passed
89.	Tariq Mehmood S/o Ali Sarwar	BA	13.04.2018	15.02.1982	18.01.2021	Not passed
90.	Asad Afsar S/o Khan Afsar	BSC	13.04.2018	20.08.1984	18.01.2021	Not passed
91.	Qazi Umair S/o Qazi Muhammad Fiaz	BA	21.01.2020	14.02.1992	14.04.2021	Not passed
92.	Abdul Razaq S/o Abdul Khaliq	FA	13.04.2018	01.03.1980	14.04.2021	Passed
93.	Naseer Ahmed S/o Bostan Lodhi	FA	13.04.2018	30.04.1986	14.04.2021	Not passed
94.	Muhammad Siddique S/o Muhammad Ayub	FA	13.04.2018	19.03.1990	14.04.2021	Not passed
95.	Sehar Gul S/o Ghulam Fareed	FA	13.04.2018	20.02.1990	14.04.2021	Not passed
96.	Muhammad Zubair S/o Muhammad Ilyas	BA	13.04.2018	01.04.1990	14.04.2021	Not passed
97.	Irshad S/o Muhammad Din	D.Com	13.04.2018	03.04.1979	14.04.2021	Passed in year 2022
98.	Umair Khan S/o Khan Bahadar Khan	BA	21.01.2020	22.04.1987	14.04.2021	Not passed

o/c

 DEPUTY COMMISSIONER
 ABBOTTABAD

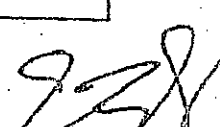
No. 1271-77 /AE(Rev)

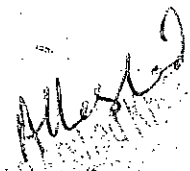

dated Abbottabad the 27-02 /2023

Copy forwarded to:-

1. Tehsildar Abbottabad.
2. Tehsildar Havelian.
3. Tehsildar Settlement Havelian.
4. Tehsildar, Lora.
5. Tehsildar, Lower Tanawal.
6. Tehsildar Land Acquisition, Abbottabad.
7. District Kanungo, Abbottabad.

For information and to circulate seniority list amongst the Patwaris under their control.

o/c

 DEPUTY COMMISSIONER
 ABBOTTABAD

Annex - D

To

P-17

The Commissioner Hazara Division,
Abbottabad

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED SENIORITY LIST OF PATWARI DATED 31/12/2022 WHICH WAS RECEIVED BY THE APPELLANT ON 21/08/2023.

Respected Sir,

1. That appellant got appointment as Patwari in Revenue Department on 01/09/2003. This fact is mentioned in the impugned seniority list of Patwaris to the extent of the appellant at serial No.8. Copy of seniority list of Patwaris issued on 31/12/2022 is attached herewith.
2. That the appellant was posted/appointed in the settlement department as settlement field Qanun-Go in BPS-11 on the basis of promotion. Copy of order dated 24/03/2016 is attached.
3. That as per posting/transfer order as the applicant settlement field Qanungo dated 24/03/2016, the post will not be transferable to revenue side, but after rendering services as settlement field Qanungo w.e.f 24/03/2016 to 25/11/2021, the appellant served as field Qanungo in BPS-11.
4. That, the appellant was repatriated in Revenue department on 25/11/2021. The name of appellant was to be placed in the seniority list of Girdawars, but unfortunately appellant has been shown at serial No.8 of the seniority list of Patwaris issued on 31/12/2022.

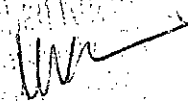
Appeal

Received
13/08/2023



25/09/2023

Appeal



5. That, the appellant is Girdawar and his name is either to be mentioned in the list of Girdawar in the Revenue Department or the appellant may be repatriated in the settlement department as field Qanungo.

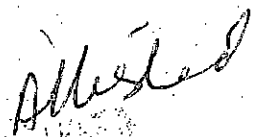
In view of the above, it is prayed that the name of the appellant may be mentioned in the seniority list of Girdawars in Revenue side or the appellant may be posted in the settlement department Havelian on his previous post of field Qanungo settlement with seniority.

Dated: 12-9 /2023



(SYED ALI SHAHID)

Patwari in Revenue Department



Annex - E

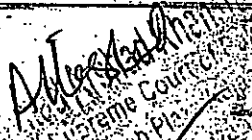
FINAL SENIORITY LIST OF SETTLEMENT MANAGERS OF SETTLEMENT OPERATIONS KHYBER PAKHTUNKHWA

P. 19

As stood on 31.01.2021

7543-59 in pursuance of Section 5 (1) of Civil Servants Act, 1973 and all subsequent Notifications issued on the subject. Final Seniority List of the Settlement Managers of Settlement Operations, Khyber Pakhtunkhwa as it stood on 31.01.2021, is herewith furnished for information to all concerned.

No.	Name with Designation of the official	Date of Birth	Qualification	Date of 1 st entry into Govt. Service	Date of regular promotion as Settlement Manager	Remarks
1.	Zabid Hussain S/o Nasir ul Haq	14.12.1976	FA	09.07.2003	10.06.2014	Normal
2.	Muhammad Abbas Khan S/o Muhammad Ayub Khan	08.02.1983	FA	17.02.2010	10.06.2014	Normal
3.	Amir Ali Shah S/o Syed Sarwar Shah	10.04.1974	B.A	01.01.2003	24.03.2016	Normal
4.	Sajid Ali Hashmi S/o Sarfaraz Khan	11.10.1986	B.A	21.03.2012	24.03.2016	Normal
5.	Muhammad S/o Muhammad Nasir Qureshi	02.04.1972	B.A	01.11.2005	18.01.2018	Normal
6.	Mirza Khan S/o Fazal Khan	05.04.1988	B.A	20.11.2007	10.01.2018	Normal
7.	Abdul Raheem S/o Abdul Ghafar	01.03.1989	FA	01.06.2012	18.01.2018	Normal
8.	Umar Khan S/o Nasir Khan	31.05.1977	FA	01.05.2012	14.07.2019	Normal
9.	Farhad Khan S/o Wahid Zaka	02.06.1980	M.A	01.01.2013	25.07.2019	Normal
10.	Sardar Muhammad Taha S/o Abdusamad Amir	01.06.1985	B.A	04.01.2012	25.07.2019	Normal
11.	Syed Bilal Iqbal S/o Syed Ghani Iqbal	14.09.1986	B.A	04.01.2012	25.07.2019	Normal
12.	Malik Shujaat S/o Mansoor ul Rehman	06.03.1987	B.A	04.08.2012	25.07.2019	Normal
13.	Shamir Ahmad S/o Ghulam Sarwar	02.07.1989	B.A	04.01.2012	25.07.2019	Normal


 Joint Secretary
 Supreme Court
 High Court

Serial No. A/100/2021

- 1. Copy forwarded to the Settlement Officer, Abbottabad, (Muzaffargarh) and
- 2. To Secretary to Govt. of Khyber Pakhtunkhwa, Peshawar
- 3. To Director Land Revenue, Khyber Pakhtunkhwa,
- 4. Official Concerned


 Joint Secretary



OFFICE OF THE
DEPUTY COMMISSIONER
ABBOTTABAD
No. 124/15 (11-527) (Rev.)
Dated 27/03/2023

ORDER:

Consequent upon the recommendations of Departmental Promotion/Selection Committee meeting held on 15.03.2023, the following Patwaris (BPS-09) of this office are hereby promoted/ appointed to the post of Kanungo (BPS-11) on regular/acting charge basis with immediate effect:-

S.No.	Name & Designation	Promoted/appointed
01.	Muhammad Hanif, Patwari (BPS-09)	Promoted to the post of Kanungo (BPS-11) on regular basis
02.	Asad Ali Shah, Patwari (BPS-09)	Appointed to the post of the Kanungo (BPS-11) on acting charge basis

On promotion, the official at S.No. 01 will be on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 15 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 198

Mahmud
DEPUTY COMMISSIONER
ABBOTTABAD

Endst No. & Date Even:

Copy forwarded to the:-

1. Commissioner Hazara Division, Abbottabad.
2. Additional Deputy Commissioner (General), Abbottabad.
3. Assistant Commissioner Abbottabad.
4. District Comptroller of Accounts, Abbottabad.
5. Additional Assistant Commissioner (Rev), Abbottabad.
6. Tehsildar Abbottabad and Havelian.
7. Officials concerned.

Mahmud

Mahmud
DEPUTY COMMISSIONER
ABBOTTABAD

کورٹ فیس

وکالت نامہ

Before the Service Tribunal Appellate بعدالت
Syed Ali Shah عنوان: Govt Appellate
Appellant منجانب:
Service Appeal نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام
M. Avshar Tanchi Adv S-C. M. Izbahim Adv. H-C
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل
صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری
کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت
ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی
بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا
ساختہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے
مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا
حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں
کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استخار سے نامہ بیغہ منفسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہے۔
لہذا وکالت نامہ تحریر کیا تاکہ سزا ہے۔

M. Izbahim
Adv H-C المقوم:

M. Izbahim
Adv H-C بمقام:
Office # 33 Jinnah Plaza Adjacent
Distt Bar Abbottabad