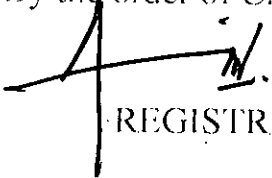


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal No.

115/2024

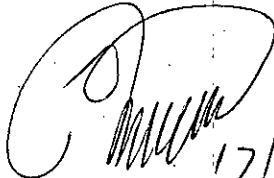
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	11/01/2024	<p>The appeal of Mr. Shaheed Ullah resubmitted today by Mr. Shahid Qayyum Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

This is an appeal filed by Mr. Shaheed Ullah today on 16/11/2023 against the order dated 08.9.2023 against which he made/preferred departmental appeal/representation on 26.09.2023 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action.

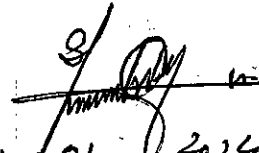
No. 3613 /ST,

Dt. 17/11 /2023.

  
17/11/23  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Shahid Qayyum Khattak Adv.  
High Court Peshawar.

The period of ninety days has now been completed  
Therefore, the same is resubmitted for further n/a &  
order please.

  
11/01/2024

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No. 115 /2023

Shaheed Ullah..... Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa home & Tribal affairs Department  
through its secretary & others..... Respondents

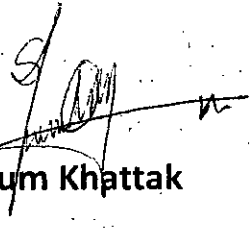
**I N D E X**

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-4
2.	Affidavit		5
3.	Application for interim relief		6-7
4.	Addresses of parties		8
5.	Copy of application and Seniority list	A-B	9-13
6.	Copy of the list	C	14-24
7.	Copy of appeal & order	D-E	25-27
8.	Copy of other relevant documents		28-29
9.	Wakalatnama		30

  
Appellant

Through

Dated 16.11.2023

  
Shahid Qayyum Khattak  
Advocate  
Supreme Court of Pakistan  
Cell No.0333-9195776

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

**Service Appeal No. 115 /2023**

Shaheed Ullah s/o Taj Ali Khan, Naib Qasid District public prosecutor office District Karak..... **Appellant**

**Versus**

1. Govt. of Khyber Pakhtunkhwa home & Tribal affairs Department through its secretary
2. Director General, Directorate of prosecution Home & Tribal Affair department, Peshawar.
3. Director administration, Directorate of prosecution, Home & Tribal department Peshawar
4. Assistant Director, Directorate of prosecution, Home & Tribal department Peshawar..... **Respondents**

**Appeal u/s 4 of the Service Tribunal Act  
KP Peshawar against the seniority list  
issued on 09.08.2023 and against the  
order dated 17.10.2023 whereby the  
departmental appeal has been filed.**

---

**Respected sir,**

1. That the Appellant was appointed as Naib Qasid in the Department of prosecution in 1994 and is having the qualification of Matric, thus rules of promotion dully applicable to the appellant.

2. That appellant filed an application on 21.11.2022 for correction in the seniority list and accordingly the necessary correction were made & his name was brought at serial No. 2 of the seniority list issued on 17.02.2023. **(Copy of application and Seniority list is attached as annexure "A" & "B")**
3. That the respondent No. 3 issued another list of seniority on 09.08.2023 where the appellant has been placed at serial No. 86 of the list **(Copy of the list is attached as annexure "C")**
4. That appellant filed departmental appeal against the above mentioned seniority list before the learned respondent No. 2 who vide order dated 17.10.2023 filed the same without providing any opportunity of hearing, nor the same order has been communicated to appellant but precured the same today i.e. 16.11.2023. **(Copy of appeal & order are attached as annexure "D" & "E")**
5. That appellant is at serial No. 2 of the seniority list but has been placed at wrong place and now the department making process of promotion and appellant being on the verge of retirement will be badly effect from the whole process, hence having no other remedy approach this Hon'ble court on following amongst other.

**GRUNDS:**

- A.** That the act of the respondents is the violation of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973 wherein it is directed that all persons should be treated equally in accordance with law.
- B.** That the act of the respondents violated the Article 4 of the Constitution of Islamic Republic of Pakistan, 1973, and all persons exercising the authority must do only in accordance with law.
- C.** That the petitioner has the requisite qualification and is most senior as per the seniority list of class IV prepared by the respondents department, therefore, eligible for promotion as Junior Clerk from Naib Qasid, thus now changing the seniority is based on malafide.
- D.** That as it is very much clear that officials appointed in first batch will be rank senior to the official(s) appointed in the subsequent batch, irrespective of the date of acquisition of SSC, which was the clear cut directions of the additional Registrar (admin) Peshawar High Court but still Appellant has been placed at wrong place in seniority list.
- E.** That respondents have not adopted proper procedure by subsequently changing the seniority list.
- F.** That changing of seniority list once corrected is totally illegal & without adopting codal formalities.

- G.** That this Hon'ble Tribunal has got ample jurisdiction to entertain and disposed off the instant Service appeal according to the facts and circumstances of the case in hand.
- H.** That any other ground or reasons if not mentioned at the time of hearing will be argued with the permission of this Hon'ble Tribunal.

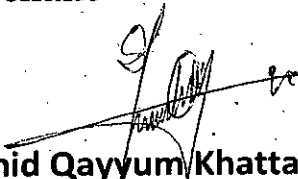
It is therefore, most humbly prayed that on acceptance of instant service appeal, the respondents may graciously be directed to promote the petitioner to the post of Junior Clerk (BPS-11) by making correction in the seniority list (as corrected seniority list issued on 17.02.2023) and the action of respondent by issuing wrong seniority list on 09.08.2023 be declare Illegal, void and without authority, as well as order dated 17.10.2023 be declare as illegal, void and without authority, hence liable to be set aside and the appellant being senior most is liable to be promoted.

Any other relief, if not specifically prayed, may also graciously be granted, if appears just, necessary and appropriate.

  
Appellant

Through

Dated 16.11.2023

  
Shahid Qayyum Khattak  
Advocate  
Supreme Court of Pakistan  
Cell No.0333-9195776

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

**Service Appeal No. \_\_\_\_\_/2023**

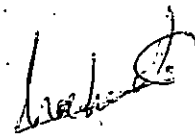
**Shaheed Ullah..... Appellant**

**Versus**

**Govt. of Khyber Pakhtunkhwa home & Tribal affairs Department  
through its secretary & others..... Respondents**

**AFFIDAVIT**

I, Shaheed Ullah s/o Taj Ali Khan, Naib Qasid District public prosecutor office District Karak, do hereby solemnly declare and affirm on oath that all the contents of accompanying this **Appeal** are true and correct and nothing has been intentionally concealed from this Hon'ble Court.



**DEPONENT**



**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

C.M No. \_\_\_\_/2023

In

Service Appeal No. \_\_\_\_/2023

Shaheed Ullah.....**Applicant/Appellant**

**Versus**

Govt. of Khyber Pakhtunkhwa home & Tribal affairs Department  
through its secretary & others.....**Respondents**

**APPLICATION FOR GRANT OF INTERIM  
RELIEF BY RESTRAINING THE  
RESPONDENTS NOT TO COMPLETE  
PROMOTION PROCESS AND  
MAINTAINED THE STATUS QUO, TILL  
THE FINAL DISPOSAL OF THE INSTANT  
APPEAL.**

---

**Respectfully Sheweth:**

1. That the titled Service Appeal is being filed before this Hon'ble Tribunal in which no date of hearing is fixed.
2. That the grounds of main appeal may be considered as integral part of this application.
3. That the balance of convenience also lies in favour of the appellant.
4. That the appellant has a good prima facie case and all the three ingredients are in favour of the appellant.

5. That if the process of promotion is completed the appellant/applicant will suffer irreparable loss and damages as he is at the verge of retirement.

It is, therefore, most humbly prayed that by accepting this application, the respondents may please be restrained from the completion of promotion process and to maintained status quo, till the final disposal of the main appeal.

*Ullah*

Applicant/Appellant

Through

Dated 16.11.2023

*Shahid Qayyum Khattak*

Shahid Qayyum Khattak  
Advocate

Supreme Court of Pakistan  
Cell No.0333-9195776

**AFFIDAVIT**

I, Shaheed Ullah s/o Taj Ali Khan, Naib Qasid District public prosecutor office District Karak, do hereby solemnly declare and affirm on oath that all the contents of this **Application** are true and correct and nothing has been intentionally concealed from this Hon'ble Court.

*Ullah*

DEPONENT

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No. \_\_\_\_\_/2023

Shaheed Ullah..... **Appellant**

**Versus**

Govt. of Khyber Pakhtunkhwa home & Tribal affairs Department  
through its secretary & others.....**Respondents**

**ADDRESSES OF PARTIES**

**APPELLANT**

Shaheed Ullah s/o Taj Ali Khan, Naib Qasid District public  
prosecutor office District Karak

**RESPONDENT**

1. Govt. of Khyber Pakhtunkhwa home & Tribal affairs  
Department through its secretary
2. Director General, Directorate of prosecution Home & Tribal  
Affair department, Peshawar.
3. Director administration, Directorate of prosecution, Home  
& Tribal department Peshawar
4. Assistant Director, Directorate of prosecution, Home &  
Tribal department Peshawar

Appellant

Through

Dated 16.11.2023

  
**Shahid Qayyum Khattak**  
**Advocate**

**Supreme Court of Pakistan**  
**Cell No.0333-9195776**

Through Proper Channel

9

Departmental Appeal برے درستی (Rectification) سینارٹی لسٹ ملازمین درجہ چہارم Class-IV Sarvent شعبہ

پراسیکوشن

جناب عالی۔

سائل نہایت مودبانہ گزارش کرتا ہے کہ سائل تعلیمی قابلیت میٹرک ہے اور 20/01/1994 یعنی گزشتہ تقریباً 29 سال سے پراسیکوشن میں بحیثیت نائب قاصد خدمات انجام دے رہا ہے۔ اب ڈائریکٹر ایڈمنسٹریشن پراسیکوشن ڈائریکٹوریٹ نے حال ہی میں درجہ چہارم ملازمین متعلقہ پراسیکوشن کی خلاف قواعد و خلاف ضابطہ سینارٹی لسٹ جاری کی ہے جو کہ civil servant کی قاعدہ نمبر 8 جز (4) Rule 8 Cluse (4) سینارٹی روڈ کے بالکل برعکس اور خلاف قواعد ہے۔ اس تنازعہ سینارٹی لسٹ کے ذریعے سال 2021 اور 2012 میں بھرتی شدہ ملازمین کو سال 1994 میں بھرتی شدہ سائل سے Senior بنایا گیا ہے۔ حالانکہ KP Civil Servant Act No. XV III seniority list appointment کے تحت سائل 1973 Rules 8 (4) اور APT Rules 1989 Rule 17 (2) کے تحت سائل 1994 لسٹ میں Top یعنی سریل نمبر 1 ہونا چاہیے۔ لیکن سائل کو seniority list کے Botome میں رکھا گیا ہے۔ اور سینارٹی روڈ کو یکے نظر انداز کیا گیا ہے حوالہ کے طور پر سول سرونٹ Act 1973 کے قاعدہ 8 جز (3) خیبر پختون خواہ APT Rules 1989 کے قاعدہ 17 جز (3) دونوں کا متن Content تحریر کرتا ہوں۔

Rule (8) (3) Seniroity on intial appointment to service cadre or post shall be determined as may be prescribed.

(4) Seniroiyt in a post, servcie or cadre to which a civil servant is promoted shall take effect from the dae of regular appointment to this post.

Rules 17 (2) of KP APT Rules 1989. Seniroity in various cadre of civil servants appointed by initial recruitment vis- vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to post in that cadre -----by intital recruitment.

چونکہ مذکورہ بالا قواعد کے تحت سینارٹی سرکاری ملازم کی اپنے عہدہ (post) پر باقاعدہ تعیناتی Regular Appointment سے شمار کی جاتی ہے۔ اور سائل کی تعیناتی کی تاریخ 20/01/1994 ہے۔ اس وجہ سے سائل سے سے زیادہ سنیئر ہے۔

استدعا ہے کہ منظور دی درخواست سائل کو سنیئر senior list قرار دے اور Seniroity list میں S. No. 1 پر رکھا جائے۔

مورخہ 20/11/2022

عریضہ

شہید اللہ نائب قاصد ڈسٹرکٹ پبلک پراسیکوشن آفس کرک



(16)

DISTRICT PUBLIC PROSECUTOR OFFICE,  
KARAK

No. DPP/KKI 915

Dated: 21/1/2022

Phone & Fax # 0927-290668

E-mail: dpkarak@yahoo.com

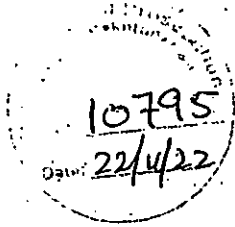
To

The Director General Prosecution,  
Govt. of Khyber Pakhtunkhwa,  
Peshawar.

Subject: **APPLICATION OF SHAHEED ULLAH NAIB QASID IN  
RESPECT OF SENIORITY LIST.**

Dear Sir,

Please find herewith the enclosed application in respect of Shaheed  
Ullah, N/Q which is self explanatory for consideration please.



*Handwritten signature and date: 22/1/22*

*Handwritten signature of the District Public Prosecutor*

District Public Prosecutor  
Karak

*Handwritten signature*

(11)

Annex - B  
2022

**TENTATIVE SENIORITY LIST OF NAIB QASID, CHOWKIDAR, SWEEPER AND IN  
DIRECTORATE OF PROSECUTION, KHELDER BAKHTUNKHA STOOD ON 17-02-2023**

No	Name	Qualification	Domicile	Date of Birth	Date of P Entry in to the service with designation and BS	Regular appointed / promotion present post			Place of Posting
						Date	BS	Method of recruitment	
1.	Anwar Said	B.A.	Swat	1-01-1989	7-11-2012 Naib Qasid (BS-01)	7-11-2012	03	Initial	Office of District Public Prosecutor, Swat
2. ✓	Mr. Shaheed Ullah	Matric	Karak	15-07-1975	20-01-1994 ✓ (Naib Qasid)	20-01-1994	-do-	-do-	District Public Prosecutor, Karak
3.	Asif ur Rehman	Matric	Lower Chitral	5-03-1992	7-11-2012 Chowkidar (BS-01)	7-11-2012	-do-	-do-	Office of District Public Prosecutor, Lower Chitral
4.	Muhammad Younas	BA	Swat	19-02-1989	7-11-2012 Chowkidar (BS-01)	7-11-2012	-do-	-do-	Office of District Public Prosecutor, Swat
5.	Ashraf Ali	Matric	Swat	4-02-1988	7-11-2012 Chowkidar (BS-01)	7-11-2012	-do-	-do-	Office of District Public Prosecutor, Swat
6.	Bakht Biland Shah	F.A.	Buner	20-03-1991	17-06-2014 Sweeper (BS-01)	17-06-2014	-do-	-do-	Office of District Public Prosecutor, Buner
7.	Akhtar Hussain Shah	Matric	Battagram	15-12-1990	25-07-2014 Chowkidar (BS-01)	25-07-2014	-do-	-do-	Office of District Public Prosecutor, Battagram
8.	Quraish Khan	BA.	Torghar	19-03-1994	25-07-2014 Naib Qasid (BS-01)	25-07-2014	-do-	-do-	Office of District Public Prosecutor, Torghar
9.	Naseer uddin saddique	FA	Torghar	06-01-1994	25-07-2014 sweeper (BS-01)	25-07-2014	-do-	-do-	Office of District Public Prosecutor, Torghar
10.	Afzal Hussain	FSc	Malakand	20-04-1995	27-07-2014 Sweeper (BS-01)	27-07-2014	-do-	-do-	Office of District Public Prosecutor, Malakand
11.	Barkatullah	Matric	Lower Chitral	10-03-1993	13-11-2014 Naib Qasid (BS-01)	13-11-2014	-do-	-do-	Office of District Public Prosecutor, Lower Chitral
12.	Adnan	FA	Swat	14-05-1996	6-03-2015 Naib Qasid (BS-01)	6-03-2015	-do-	-do-	Office of District Public Prosecutor, Shangla

	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BS	Regular appointed / promotion / present post			Place of Posting
						Date	BS	Method of recruitment	
13.	Abdur Rehman	F.A	Peshawar	07-03-1989	14-04-2015 Naib Qasid (BS-01)	14-04-2015	-do-	-do-	Office of District Public Prosecutor, Mohmand
14.	Sajjad Ali	BBA	Buner	02-03-1990	14-04-2015 Naib Qasid (BS-01)	14-04-2015	-do-	-do-	Directorate of Prosecution, Peshawar.
15.	Sajjad Ahmad	Matric	Peshawar	05-01-1983	28-07-2006 Chowkidar (BS-01)	28-07-2006	03	Initial	Office of District Public Prosecutor, Peshawar.
16.	Muhammad Iqrar Ullah	Matric	Peshawar	25-03-1991	05-12-2017 Naib Qasid (BS-01)	05-12-2017	-do-	-do-	RD Kohat
17.	Muhammad Ibrahim Khan	BTE(HONS)	Nowshera	15-05-1997	05-12-2017 Naib Qasid (BS-01)	05-12-2017	-do-	-do-	Directorate of Prosecution, Peshawar.
18.	Haseen Ur Rehman	BA	Mardan	10-04-1998	05-12-2017 Naib Qasid (BS-01)	05-12-2017	-do-	-do-	Office of District Public Prosecutor, Mardan.
19.	Sartaj Khan	F.A	Swabi	03-04-1976	16-10-1995 Naib Qasid (BS-01)	16-10-1995	-do-	-do-	Office of District Public Prosecutor SWABI
20.	Muhammad Minhas	FA	Abbottabad	15-04-1984	02-05-2014 (Chowkidar BS-02)	02-05-2014	-do-	-do-	District Public Prosecutor Abbotabbad
21.	Sabir shah	F.A	Khyber	01-04-1973	08-10-2004 NAIB Qasid (BS-01)	09-12-2020	-do-	Surplus employees adjusted against vacant posts in Khyber.	DPP Khyber
22.	Zamrud khan	Matric	Khyber	02-02-1978	08-10-2004 Chowkidar (BS-01)	09-12-2020	-do-	-do-	do-
23.	Sajid ullah	Matric	Khyber	03-03-1986	08-10-2004 NAIB Qasid (BS-01)	09-12-2020	-do-	-do-	do-
24.	Ikhlaq Khan	BA	Khyber	06-06-1984	31-03-2007 NAIB QASID (BS-01)	09-12-2020	-do-	-do-	District Public Prosecutor OFFICE khyber

(12)

	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BS	Regular appointed / promotion to present post			Place of Posting
						Date	BS	Method of recruitment	
	Muhammad Sharif	Matric	Khyber	01-01-1980	08-10-2004 NAIB QASID (BS-01)	-do-	-do-	-do-	District Public Prosecutor OFFICE khyber
26.	Muhammad Irfan	Matric	Mardan	22-04-1986	18-09-2012 (Chowkidar)	18-09-2012	-do-	-do-	District Public Prosecutor, Mardan.
27.	Shabeer Hussain	Matric	Mardan	25-02-1988	20-01-2020 (NAIB QASID)	20-01-2020	-do-	-do-	District Public Prosecutor, Mardan
28.	Tariq Ali	BA	Mardan	02-01-1981	20-01-2020 (NAIB QASID)	20-01-2020	03	Initial	District Public Prosecutor, Mardan
29.	Junaid Ahmad	FA	Charsadda	30-03-1996	20-01-2020 (CHAWKIDAR)	20-01-2020	-do-	-do-	District Public Prosecutor, Charsadda
30.	Zia Ullah	MA	Swat	05-02-1988	11-03-2020(NAIB QASID)	11-03 -2020	-do-	-do-	District Public Prosecutor, Swat
31.	Zakir Khan	FA	Swat	03-03-1988	11-03-2020(NAIB QASID)	11-03 -2020	-do-	-do-	District Public Prosecutor, Swat
32.	Muhammad Junaid	FA	D.I Khan	24-05-1992	11-03-2020(NAIB QASID)	11-03 -2020	-do-	-do-	District Public Prosecutor, DI Khan
33.	Fasihullah	FA	D.I Khan	10-08-1997	11-03-2020 (CHAWKIDAR)	11-03-2020	-do-	-do-	District Public Prosecutor, DI Khan
34.	Yaseen Khan	Matric	Swat	16-01-2001	11-03 -2020 (NAIB QASID)	11-03 -2020	-do-	-do-	District Public Prosecutor, Swat
35.	Muhammad Hamza	FSc	Swat	10-09-2000	11-03-2020 (Naib Qasid)	11-03-2020	-do-	-do-	District Public Prosecutor, Swat
36.	Meer Zaman	Matric	Lakki Marwat	15-06-1993	17-04-2020 (NAIB QASID)	17-04-2020	-do-	-do-	District Public Prosecutor, Lakki Marwat
37.	Muhammad	Matric	Mohmand	02-01-1981	07-08-2020	07-08-2020	-do-	-do-	District Public Prosecutor,

*[Handwritten Signature]*



	Name	Qualification	Domesticity	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BS	Regular appointed / promotion to present post			Place of Posting
						Date	BS	Method of recruitment	
	Younus				(NAIB QASID)				Mohmand
38.	Ijaz Ahmad	FSC	Peshawar	05-1999	04-09-2020(NAIB QASID)	04-09-2020	-do-	-do-	District Public Prosecutor, Peshawar
39.	Shahbaz Ahmad	FA	Abbottabad	28-06-1991	23-10-2020 (NAIB QASID)	23-10-2020	-do-	-do-	District Public Prosecutor, Abbottabad
40.	Zain ul Abideen	D.I.T	Bannu	05-04-1994	23-10-2020 (NAIB QASID)	23-10-2020	03	Initial	District Public Prosecutor, Bannu
41.	Muhammad Meraj	D.I.T	Bannu	31-03-1997	23-10-2020 (NAIB QASID)	23-10-2020	-do-	-do-	District Public Prosecutor, Bannu
42.	Khushanzeb Khan	D.A.E	Bannu	27-03-1999	23-10-2020 (NAIB QASID)	23-10-2020	-do-	-do-	District Public Prosecutor, Bannu
43.	Iftikhar Ahmad	BA	Karak	12-03-1988	04-11-2020 (NAIB QASID)	04-11-2020	-do-	-do-	District Public Prosecutor, Karak
44.	Anwar Ul Haq	FA	Karak	09-04-1990	04-11-2020 (NAIB QASID)	04-11-2020	-do-	-do-	District Public Prosecutor, Karak
45.	Wasim Afridi	BA	Charsadda	16-04-1995	04-11-2020 (NAIB QASID)	04-11-2020	-do-	-do-	District Public Prosecutor, Charsadda
46.	Ijaz Akhtar	FA	Malakand	08-02-1992	09-11-2020 (NAIB QASID)	09-11-2020	-do-	-do-	District Public Prosecutor, Malakand
47.	Haidar Khan	Matric	Malakand	25-03-1998	09-11-2020 (NAIB QASID)	09-11-2020	-do-	-do-	District Public Prosecutor, Malakand
48.	Abdul Ghafoor	Matric	Kohistan	01-01-1991	08-01-2021 (CHOWKIDAR)	08-01-2021	-do-	-do-	District Public Prosecutor, lower Kohistan
49.	Saif Ur Rehman	Matric	Kohistan	10-10-1999	08-01-2021(SWEEPER)	08-01-2021	-do-	-do-	District Public Prosecutor, lower Kohistan

(15)

	Name	Qualification	District	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BS	Regularly appointed, promotion, present post			Place of Posting
						Date	BS	Method of recruitment	
50.	Muhammad Iqbal	Matric	Mardan	01-03-1987	12-03-2021 (CHOWKIDAR)	12-03-2021	-do-	-do-	District Public Prosecutor, Mardan
51.	Amir Ali Shah	FA	Mardan	15-03-1998	12-03-2021(CHOWKIDAR)	12-03-2021	-do-	-do-	RD, Mardan
52.	Haris Khan	Matric	Nowshera	10-11-2002	12-04-2021(Chowkidar)	12-Apr-2021	03	Initial	District Public Prosecutor, Nowshera
53.	Muhammad Bilal Khan	MA	Bannu	14-04-1992	09-06-2021(CHOWKIDAR)	09-06-2021	-do-	-do-	District Public Prosecutor, Bannu
54.	Hamza Ali Shah	FSc	Bannu	25-03-1999	09-06-2021 (NAIB QASID)	09-06-2021	-do-	-do-	District Public Prosecutor, Bannu
55.	Jawad Ahmad	Matric	Charsadda	10-05-1995	16-06-2021 (NAIB QASID)	16-06-2021	-do-	-do-	District Public Prosecutor, Charsadda
56.	Muhammad Sajid Khan	Matric	Kohat	27-01-1982	22-06-2021 (NAIB QASID)	22-06-2021	-do-	-do-	District Public Prosecutor, Kohat
57.	Sheraz Hussain	FA	Kurram	10-04-1999	22-06-2021 (NAIB QASID)	22-06-2021	-do-	-do-	District Public Prosecutor, Kurram
58.	Fahim Saifullah	DAE	Kohat	17-01-1999	22-06-2021 (NAIB QASID)	22-06-2021	-do-	-do-	District Public Prosecutor, Abbottabad
59.	Sajjad Ali Shah	FA	Mardan	05-04-1999	14-07-2021 (Naib Qasid)	14-07-2021	-do-	-do-	District Public Prosecutor, Mardan
60.	Arif Jan	BA	Charsadda	14-02-1990	15-07-2021 (NAIB Qasid)	15-07-2021	-do-	-do-	District Public Prosecutor, Charsadda
61.	Adil Khan	FSc	North Waziristan	12-02-1991	15-07-2021 (NAIB QASID)	15-07-2021	-do-	-do-	District Public Prosecutor, North Waziristan

	Name	Qualification	District	Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BS	Regular appointed / promotion present post			Place or Posting
						Date	BS	Method of recruitment	
62.	Sajid Khan	DAE	North Waziristan	01-04-1995	15-07-2021 (Naib Qasid)	15-07-2021	-do-	-do-	District Public Prosecutor, North Waziristan
63.	Waqas Ali	Matric	Swabi	01-05-1994	27-07-2021 (CHOWKIDAR)	27-07-2021	-do-	-do-	District Public Prosecutor, Swabi
64.	Hammad Khan	DAE	Swabi	03-03-2000	27-07-2021 (Naib Qasid)	27-07-2021	03	Initial	District Public Prosecutor, Swabi
65.	Sana ul Haq Usmani	Matric	Battagram	15-05-1994	02-08-2021 (Naib Qasid)	02-08-2021	-do-	-do-	District Public Prosecutor, Battagram
66.	Naz Mir Khan	Matric	Bannu	01-07-1981	01-08-2012 (Chowkidar BPS-01)	01-08-2012	-do-	-do-	District Public Prosecutor, Bannu
67.	Tahir Khan	FSC	Peshawar	18-02-1996	29-03-2022 (Naib Qasid)	29-03-2022	-do-	-do-	DOP
68.	Shah Zeb	FSC	Mardan	30-05-1997	29-03-2022 (Naib Qasid)	29-03-2022	-do-	-do-	DOP
69.	Mr. Sana Ullah	FSC,	Mardan	12-03-2002	29-03-2022 (Naib Qasid)	29-03-2022	-do-	-do-	DOP

Director Administration  
Directorate of Prosecution  
Khyber Pakhtunkhwa.

**FINAL SENIORITY LIST OF MATRICULATE NAIB QASID, CHOWKIDAR AND SWEEPER IN  
DIRECTORATE OF PROSECUTION, KHYBER PAKHTUNKHWA AS STOOD ON 09-08-2023**

Annexure - C

S. No.	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
1.	Ashraf Ali	Matric	Swat	4-02-1988	7-11-2012 Chowkidar (BPS-01)	7-11-2012	01	Initial	Office of District Public Prosecutor, Swat
2.	Anwar Said	BA	Swat	1-01-1989	7-11-2012 Naib Qasid (BPS-01)	7-11-2012	-do-	-do-	Office of District Public Prosecutor, Swat
3.	Muhammad Younas	BA	Swat	19-02-1989	7-11-2012 Chowkidar (BPS-01)	7-11-2012	-do-	-do-	Office of District Public Prosecutor, Swat
4.	Asif ur Rehman	Matric	Lower Chitral	5-03-1992	7-11-2012 Chowkidar (BPS-01)	7-11-2012	-do-	-do-	Office of District Public Prosecutor, Lower Chitral
5.	Bakht Biland Shah	FA	Buner	20-03-1991	17-06-2014 Sweeper (BPS-01)	17-06-2014	-do-	-do-	Office of District Public Prosecutor, Buner
6.	Akhtar Hussain Shah	Matric	Battagram	15-12-1990	25-07-2014 Chowkidar (BPS-01)	25-07-2014	-do-	-do-	Office of District Public Prosecutor, Battagram
7.	Quraish Khan	BA	Torghar	19-03-1994	25-07-2014 Naib Qasid (BPS-01)	25-07-2014	-do-	-do-	Office of District Public Prosecutor, Torghar

S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
8.	Naseer Uddin saddique	FA	Torghar	06-01-1994	25-07-2014 sweeper (BPS-01)	-25-07-2014	01	Initial	Office of District Public Prosecutor, Torghar
9.	Afzal Hussain	F.Sc	Malakand	20-04-1995	27-07-2014 Sweeper (BPS-01)	27-07-2014	-do-	-do-	Office of District Public Prosecutor, Malakand
10.	Barkatullah	Matric	Lower Chitral	10-03-1993	13-11-2014 Naib Qasid (BPS-01)	13-11-2014	-do-	-do-	Office of District Public Prosecutor, Lower Chitral
11.	Adnan	FA	Swat	14-05-1996	6-03-2015 Naib Qasid (BPS-01)	6-03-2015	-do-	-do-	Office of District Public Prosecutor, Shangla
12.	Abdur Rehman	FA	Peshawar	07-03-1989	14-04-2015 Naib Qasid (BPS-01)	14-04-2015	-do-	-do-	Office of District Public Prosecutor, Mohmand
13.	Sajjad Ali	BBA	Buner	02-03-1990	14-04-2015 Naib Qasid (BPS-01)	14-04-2015	-do-	-do-	Directorate of Prosecution.
14.	Sajjad Ahmad	Matric (September 2016)	Peshawar	05-01-1983	28-07-2006 Chowkidar (BPS-01)	28-07-2006	-do-	-do-	Office of District Public Prosecutor, Peshawar.
15.	Muhammad Iqrar Ullah	Matric	Peshawar	25-03-1991	05-12-2017 Naib Qasid (BPS-01)	05-12-2017	-do-	-do-	Office of Regional Director Prosecution, Kohat
16.	Muhammad Ibrahim Khan	BTE (HONS)	Nowshera	15-05-1997	05-12-2017 Naib Qasid (BPS-01)	05-12-2017	-do-	-do-	Directorate of Prosecution, Peshawar.
17.	Haseen Ur Rehman	BA	Mardan	10-04-1993	05-12-2017 Naib Qasid (BPS-01)	05-12-2017	-do-	-do-	Office of District Public Prosecutor, Mardan

S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
18.	Sartaj Khan	FA	Swabi	03-04-1976	16-10-1995 Naib Qasid (BPS-01)	16-10-1995	01	Initial	Office of District Public Prosecutor, Swabi
19.	Muhammad Minhas	FA	Abbottabad	15-04-1984	02-05-2014 Chowkidar (BPS-02)	02-05-2014	02	-do-	Office of District Public Prosecutor Abbottabad
20.	Sabir shah	FA	Khyber	01-04-1973	08-10-2004 NAIB Qasid (BPS-01)	09-12-2020	01	Surplus employees adjusted against vacant posts in Khyber.	Office of District Public Prosecutor, Khyber
21.	Zamrud khan	Matric	Khyber	02-02-1978	08-10-2004 Chowkidar (BPS-01)	09-12-2020	-do-	-do-	-do-
22.	Muhammad Sharif	Matric	Khyber	01-01-1980	08-10-2004 Naib Qasid (BPS-01)	09-12-2020	-do-	-do-	-do-
23.	Ikhlaq Khan	BA	Khyber	06-06-1984	31-03-2007 Naib Qasid (BPS-01)	09-12-2020	-do-	-do-	-do-
24.	Sajid Ullah	Matric	Khyber	03-03-1986	08-10-2004 Naib Qasid (BPS-01)	09-12-2020	-do-	-do-	-do-
25.	Muhammad Irfan	Matric	Mardan	22-04-1986	18-09-2012 Chowkidar (BPS-03)	18-09-2012	03	Initial	Office of District Public Prosecutor, Mardan
26.	Tariq Ali	BA	Mardan	02-01-1981	20-01-2020 Naib Qasid (BPS-03)	20-01-2020	-do-	-do-	Office of District Public Prosecutor, Mardan
27.									

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S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
28.	Junaid Ahmad	FA	Charsadda	30-03-1996	20-01-2020 Chowkidar (BPS-03)	20-01-2020	03	Initial	Office of District Public Prosecutor, Charsadda
29.	Zia Ullah	MA	Swat	05-02-1988	11-03-2020 Naib Qasid (BPS-03)	11-03 -2020	-do-	-do-	Office of District Public Prosecutor, Swat
30.	Zakir Khan	FA	Swat	03-03-1988	11-03-2020 Naib Qasid (BPS-03)	11-03 -2020	-do-	-do-	Office of District Public Prosecutor, Swat
31.	Muhammad Junaid	FA	D.I Khan	24-05-1992	11-03-2020 Naib Qasid (BPS-03)	11-03 -2020	-do-	-do-	Office of District Public Prosecutor, DI Khan
32.	Fasihullah	FA	D.I Khan	10-08-1997	11-03-2020 Chowkidar (BPS-03)	11-03-2020	-do-	-do-	Office of District Public Prosecutor, DI Khan
33.	Muhammad Hamza	F. Sc	Swat	10-09-2000	11-03-2020 Naib Qasid (BPS-03)	11-03-2020	-do-	-do-	Office of District Public Prosecutor, Swat
34.	Yaseen Khan	Matric	Swat	16-01-2001	11-03 -2020 Naib Qasid (BPS-03)	11-03 -2020	-do-	-do-	Office of District Public Prosecutor, Swat
35.	Nasir Khan	FA	Lakki Marwat	21-02-1995	13-03-2020 as Naib Qasid (BPS-03)	13-03-2020	-do-	-do-	Office of District Public Prosecutor, Lakki Marwat
36.	Muhammad Jawad	FA	Lakki Marwat	11-02-1999	13-03-2020 as Chowkidar (BPS-03)	13-03-2020	-do-	-do-	Office of District Public Prosecutor, Lakki Marwat
37.	Meer Zaman	Matric	Lakki Marwat	15-06-1993	17-04-2020 Naib Qasid (BPS-03)	17-04-2020	-do-	-do-	Office of District Public Prosecutor, Lakki Marwat

S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
38.	Muhammad Younus	Matric	Mohmand	02-01-1981	07-08-2020 Naib Qasid (BPS-03)	07-08-2020	03	Initial	Office of District Public Prosecutor, Mohmand
39.	Ijaz Ahmad	F.SC	Peshawar	25-05-1999	04-09-2020 Naib Qasid (BPS-03)	04-09-2020	-do-	-do-	Office of District Public Prosecutor, Peshawar
40.	Shahbaz Ahmad	FA	Abbottabad	28-06-1991	23-10-2020 Naib Qasid (BPS-03)	23-10-2020	-do-	-do-	Office of District Public Prosecutor, Abbottabad
41.	Zain ul Abideen	D.I.T	Bannu	05-04-1994	23-10-2020 Naib Qasid (BPS-03)	23-10-2020	-do-	-do-	Office of District Public Prosecutor, Bannu
42.	Muhammad Miraj	D.I.T	Bannu	31-03-1997	23-10-2020 Naib Qasid (BPS-03)	23-10-2020	-do-	-do-	Office of District Public Prosecutor, Bannu
43.	Khushanzeb Khan	D.A.E	Bannu	27-03-1999	23-10-2020 Naib Qasid (BPS-03)	23-10-2020	-do-	-do-	Office of District Public Prosecutor, Bannu
44.	Iftikhar Ahmad	BA	Karak	12-03-1988	04-11-2020 Naib Qasid (BPS-03)	04-11-2020	-do-	-do-	Office of District Public Prosecutor, Karak
45.	Anwar Ul Haq	FA	Karak	09-04-1990	04-11-2020 Naib Qasid (BPS-03)	04-11-2020	-do-	-do-	Office of District Public Prosecutor, Karak
46.	Wasim Afridi	BA	Charsadda	16-04-1995	04-11-2020 Naib Qasid (BPS-03)	04-11-2020	-do-	-do-	Office of District Public Prosecutor, Charsadda
47.	Ijaz Akhtar	FA	Malakand	08-02-1992	09-11-2020 Naib Qasid (BPS-03)	09-11-2020	-do-	-do-	Office of District Public Prosecutor, Malakand
48.	Mahdar				09-11-2020 Naib Qasid (BPS-03)				Office of District Public Prosecutor, Malakand



S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
49.	Abdul Ghafoor	Matric	Kohistan	01-01-1991	08-01-2021 Chowkidar (BPS-03)	08-01-2021	03	Initial	Office of District Public Prosecutor, lower Kohistan
50.	Saif Ur Rehman	Matric	Kohistan	10-10-1999	08-01-2021 Sweeper (BPS-03)	08-01-2021	-do-	-do-	Office of District Public Prosecutor, lower Kohistan
51.	Zakir Ullah Khan	FA	Bannu	18-03-2002	25-01-2022 as Naib Qasid	25-01-2022	-do-	-do-	Office of District Public Prosecutor, Bannu
52.	Muhammad Iqbal	Matric	Mardan	01-03-1987	12-03-2021 Chowkidar (BPS-03)	12-03-2021	-do-	-do-	Office of District Public Prosecutor, Mardan
53.	Amir Ali Shah	FA	Mardan	15-03-1998	12-03-2021 (CHOWKIDAR)	12-03-2021	-do-	-do-	Office of Regional Director Prosecution, Mardan
54.	Haris Khan	Matric	Nowshera	10-11-2002	12-04-2021 Chowkidar (BPS-03)	12-04-2021	-do-	-do-	Office of District Public Prosecutor, Nowshera
55.	Shahab Habib	Matric/DAE	Peshawar	09-12-1998	21-04-2021 as Naib Qasid (BPS-03)	21-04-2021	-do-	-do-	Office of District Public Prosecutor Peshawar
56.	Muhammad Bilal Khan	MA	Bannu	14-04-1992	09-06-2021 Chowkidar (BPS-03)	09-06-2021	-do-	-do-	Office of District Public Prosecutor, Bannu
57.	Hamza Ali Shah	F. Sc	Bannu	25-03-1999	09-06-2021 Naib Qasid (BPS-03)	09-06-2021	-do-	-do-	Office of District Public Prosecutor, Bannu
58.	Jawad Ahmad	Matric	Charsadda	10-05-1995	16-06-2021 Naib Qasid (BPS-03)	16-06-2021	-do-	-do-	Office of District Public Prosecutor, Charsadda
59.	Muhammad Sajid Khan	Matric	Kohistan	27-01-1983	22-06-2021 Naib Qasid (BPS-03)	22-06-2021	-do-	-do-	Office of District Public Prosecutor, Kohistan

S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
60.	Fahim Saifullah	DAE	Kohat	17-01-1999	22-06-2021 Naib Qasid (BPS-03)	22-06-2021	03	Initial	Office of District Public Prosecutor, Abbottabad
61.	Sheraz Hussain	FA	Kurram	10-04-1999	22-06-2021 Naib Qasid (BPS-03)	22-06-2021	-do-	-do-	Office of District Public Prosecutor, Kurram
62.	Sajjad Ali Shah	FA	Mardan	05-04-1999	14-07-2021 Naib Qasid (BPS-03)	14-07-2021	-do-	-do-	Office of District Public Prosecutor, Mardan
63.	Arif Jan	BA	Charsadda	14-02-1990	15-07-2021 Naib Qasid (BPS-03)	15-07-2021	-do-	-do-	Office of District Public Prosecutor, Charsadda
64.	Adil Khan	F. Sc	North Waziristan	12-02-1991	15-07-2021 Naib Qasid (BPS-03)	15-07-2021	-do-	-do-	Office of District Public Prosecutor, North Waziristan
65.	Sajid Khan	DAE	North Waziristan	01-04-1995	15-07-2021 Naib Qasid (BPS-03)	15-07-2021	-do-	-do-	Office of District Public Prosecutor, North Waziristan
66.	Waqas Ali	Matric	Swabi	04-05-1994	27-07-2021 Chowkidar (BPS-03)	27-07-2021	-do-	-do-	Office of District Public Prosecutor, Swabi
67.	Hammad Khan	DAE	Swabi	03-03-2000	27-07-2021 Naib Qasid (BPS-03)	27-07-2021	-do-	-do-	Office of District Public Prosecutor, Swabi
68.	Abid Tanveer	Middle	Abbottabad	30-04-1994	02-08-2021 Chowkidar (BPS-03)	02-08-2021	-do-	-do-	Office of District Public Prosecutor, Abbottabad
69.	Sana ul Haq Usman	Matric	Battagram	15-05-1994	02-08-2021 Naib Qasid (BPS-03)	02-08-2021	-do-	-do-	Office of District Public Prosecutor, Battagram
70.					07-09-2021				

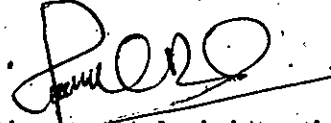
S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
71.	Mishqat Ullah	F.SC	Peshawar	12-05-1991	07-09-2021 Naib Qasid (BPS-03)	07-09-2021	03	Initial	Office of District Public Prosecutor, Peshawar
72.	Farman Ullah	BA	Peshawar	28-03-1992	07-09-2021 Naib Qasid (BPS-03)	07-09-2021	-do-	-do-	Office of Regional Director Prosecution, Peshawar
73.	Noman Khan	BA/DIT	Peshawar	15-04-1992	07-09-2021 Naib Qasid (BPS-03)	07-09-2021	-do-	-do-	Office of District Public Prosecutor, Peshawar
74.	Shah Fahad	FA	Peshawar	01-01-1997	07-09-2021 Naib Qasid (BPS-03)	07-09-2021	-do-	-do-	Office of District Public Prosecutor, Peshawar
75.	Hazrat Sohail	FA	Peshawar	12-07-1997	07-09-2021 as Naib Qasid BPS-03	07-09-2021	-do-	-do-	Office of District Public Prosecutor, Peshawar
76.	Ahmad Shah	BA	Peshawar	01-01-2000	07-09-2021 as Naib Qasid BPS-03	07-09-2021	-do-	-do-	Office of District Public Prosecutor, Peshawar
77.	Muhammad Hisam	FSC	Peshawar	20-03-2002	07-09-2021 as Naib Qasid BPS-03	07-09-2021	-do-	-do-	Office of Regional Director Prosecution, Peshawar
78.	Nadeem Khan	MA (IR)	Mardan	11-02-1994	13-09-2021 as Naib Qasid BPS-03	13-09-2021	-do-	-do-	Office of Regional Director Prosecution, Mardan
79.	Mehran Shah	BA	Mardan	12-01-1995	13-09-2021 as Naib Qasid BPS-03	13-09-2021	-do-	-do-	Office of District Public Prosecutor, Mardan
80.	Rizwan Ullah	FA	Mardan	08-03-1997	13-09-2021 as Naib Qasid BPS-03	13-09-2021	-do-	-do-	Office of District Public Prosecutor, Mardan
81.	Kifayat Ullah	FA	Mardan	11-01-1991	13-09-2021 as Naib Qasid BPS-03	13-09-2021	-do-	-do-	Office of District Public Prosecutor, Mardan

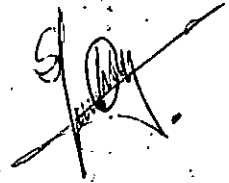
S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
82.	Murtaza Khan	B. Com	Mardan	16-03-1985	14-09-2021 as Naib Qasid BPS-03	14-09-2021	03	Initial	Office of Regional Director Prosecution, Mardan
83.	Muhammad Shabeer	F. Sc	Mardan	02-01-2000	22-09-2021 as Naib Qasid BPS-03	22-09-2021	-do-	-do-	Office of District Public Prosecutor, Mohmand
84.	Phool Nawaz Khan	FA	Mansehra	11-01-1992	23-09-2021 as Naib Qasid BPS-03	23-09-2021	-do-	-do-	Office of District Public Prosecutor, Mansehra
85.	Naz Mir Khan	Matric 28-09-2021	Bannu	01-07-1981	01-08-2012 Chowkidar (BPS-01)	01-08-2012	01	-do-	Office of District Public Prosecutor, Bannu
86.	Shaheed Ullah	Matric 08-03-2022	Karak	15-07-1975	20-01-1994 Naib Qasid (BPS-01)	20-01-1994	-do-	-do-	Office of District Public Prosecutor, Karak
87.	Jamshed	EA	Lakki Marwat	20-08-1996	28-09-2021 Sweeper (BPS-03)	28-09-2021	03	-do-	Office of District Public Prosecutor, Lakki Marwat
88.	Saeed Khan	Matric	Nowshera	20-05-2001	13-12-2021 Naib Qasid (BPS-03)	13-12-2021	-do-	-do-	Office of District Public Prosecutor, Nowshera
89.	Taimoor Babar	Matric	Peshawar	03-06-1999	23-02-2022 Naib Qasid (BPS-03)	23-02-2022	-do-	-do-	Office of District Public Prosecutor, Peshawar
90.	Muhammad Ukasha	Matric	Charsadda	23-03-2002	22-02-2022 Naib Qasid (BPS-03)	24-02-2022	-do-	-do-	Office of District Public Prosecutor, Charsadda
91.	Umair Ali	BA/DAE	Mardan	18-02-1987	29-03-2022 Naib Qasid (BPS-03)	29-03-2022	-do-	-do-	Directorate of Prosecution

S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
92.	Tahir Khan	F.SC	Peshawar	18-02-1996	29-03-2022 Naib Qasid (BPS-03)	29-03-2022	03	Initial	Directorate of Prosecution
93.	Shah Zeb	F.SC	Mardan	30-05-1997	29-03-2022 Naib Qasid (BPS-03)	29-03-2022	-do-	-do-	Directorate of Prosecution
94.	Sana Ullah	F.SC	Mardan	12-03-2002	29-03-2022 Naib Qasid (BPS-03)	29-03-2022	-do-	-do-	Directorate of Prosecution
95.	Aadil Nawaz	Matric	Peshawar	07-06-1999	21-04-2022 Naib Qasid (BPS-03)	21-04-2022	-do-	-do-	Office of District Public Prosecutor, Peshawar
96.	Sheraz Ali	BA	Haripur	23-11-1991	24-01-2022 Naib Qasid (BPS-03)	24-01-2022	-do-	-do-	Office of District Public Prosecutor, Haripur
97.	Mati Ur Rehman	Matric	Mardan	16-02-1992	29-03-2022 Naib Qasid (BPS-03)	29-03-2022	-do-	-do-	Directorate of Prosecution
98.	Muhammad Anees	MBA	D.I. Khan	02-05-1990	26-04-2022 Naib Qasid (BPS-03)	26-04-2022	-do-	-do-	Office of Regional Director Prosecution, D.I. Khan
99.	Muhammad Zubair	Matric	D.I. Khan	20-03-2002	26-04-2022 Chowkidar (BPS-03)	26-04-2022	-do-	-do-	Office of Regional Director Prosecution, D.I. Khan
100.	Abdus Samad	BA	Peshawar	03-05-1988	05-08-2022 Naib Qasid (BPS-03)	05-08-2022	-do-	-do-	Office of District Public Prosecutor, Peshawar
101.	Muhammad Ashfaq	Matric 15-08-2022	Abbottabad	01-01-1973	18-07-1996 Naib Qasid (BPS-01)	18-07-1996	01	-do-	Office of District Public Prosecutor, Abbottabad
102.	Amir Aslam	Matric	Peshawar	11-01-2002	19-08-2022 Naib Qasid (BPS-03)	19-08-2022	03	-do-	Office of District Public Prosecutor, Peshawar

*[Handwritten signature]*

S. No	Name	Qualification	Domicile	Date of Birth	Date of 1 <sup>st</sup> Entry in to the service with designation and BPS	Regular appointed / promotion to present post			Place of Posting
						Date	BPS	Method of recruitment	
103.	Shan Ahmad Naveed	Matric	Peshawar	10-04-1991	06-09-2022 Naib Qasid (BPS-03)	06-09-2022	03	Initial	Directorate of Prosecution
104.	Mudassir Gul.	Matric	Nowshera	01-04-1991	07-11-2022 Naib Qasid (BPS-03)	07-11-2022	-do-	-do-	Office of District Public Prosecutor, Nowshera
105.	Touqeer Ahmad	BA	Haripur	07-02-1988	10-11-2022 Chowkidar (BPS-03)	10-11-2022	-do-	-do-	Office of District Public Prosecutor, Haripur

  
**Director Administration**  
**Directorate of Prosecution**  
**Khyber Pakhtunkhwa.**



محضور جناب ڈائریکٹر جنرل پراسیکوشن ہوم ڈیپارٹمنٹ خیبر پختونخواہ پشاور

Through Proper Channel

ڈیپارٹمنٹل اپیل برائے درستی سیناری ٹی لسٹ درجہ چہارم ملازمین شعبہ پراسیکوشن بدیں امر کہ پہلے غلط تھا اور ڈیپارٹمنٹل اپیل کے ذریعے درستی کی گئی تھی اور اب دوبارہ سیریل نمبر 2 سے غلط طور پر سیریل نمبر 86 میں رکھا ہے۔

جناب عالی اسماں حسب ذیل عرض رساں ہے۔

(1) یہ کہ سائل مورخہ 20.01.1994 سے عرصہ 29 سال سے پراسیکوشن ڈیپارٹمنٹ میں بحیثیت نائب قاصد ملازم ہے۔

(2) یہ کہ سائل کی تعلیمی قابلیت میٹرک ہے۔ اور جو میٹرک کی پروموشن کیلئے موزوں ہے۔

(3) یہ کہ سال 2022ء کے جاری کردہ سیناری ٹی لسٹ درجہ چہارم ملازمین میں سائل کو غلط طور پر یا میرٹ کیخلاف سیریل نمبر 66 پر رکھا گیا تھا۔ جس پر سائل نے ڈیپارٹمنٹل اپیل کی اور درستی کے بعد سائل کو درست طور پر سیریل نمبر 2 پر لسٹ جاری شدہ مورخہ 17.02.2023 میں لایا گیا۔ (نوٹوکاپی لف ہے)

(4) یہ کہ اب سائل کو سیناری ٹی لسٹ جاری شدہ مورخہ 09.08.2023 میں ایک بار پھر غلط طور پر سیریل نمبر 2 کی بجائے سیریل نمبر 86 میں رکھا گیا ہے۔ (نوٹوکاپی لف ہے)

(5) یہ کہ مول سرونٹ ایکٹ 1973ء کے تحت ملازم کی سیناری ٹی appointment کے پہلے دن سے شمار ہوتی ہے نہ کہ میٹرک پاس کرنے کے دن سے۔ (ESTA CODE کی کاپی لف ہے)۔

(6) یہ کہ سائل کو بے بنیاد، غیر قانونی طور پر اور میرٹ کی خلاف ورزی کر کے میٹرک کی تعلیم کو بنیاد بنا کر سیریل نمبر 86 پر لایا گیا ہے جو کہ سراسر نا انصافی ہے۔

لہذا استدعا ہے کہ منظور در خواست ہذا سیناری ٹی لسٹ میں درستی کر کے سائل کو سیریل نمبر 2 پر لایا جاوے۔ تاکہ سائل کی دائر سی ہو سکے۔ سائل تاحیات دعا گو رہیگا۔

رضے

شہید اللہ نائب قاصد پبلک پراسیکوٹر آفس ضلع کرک  
26/09/23

محکمہ سرائے اعلیٰ دہری کاروانی  
ایڈیشنل سیکریٹری (س) محکمہ اعلیٰ سیکر

(26)



DISTRICT PUBLIC PROSECUTOR OFFICE,  
KARAK  
No. DPP/KKI/ 1157  
Dated: 27/09/2023  
Phone & Fax # 0927-290668  
E-mail: [dppkrk2022@gmail.com](mailto:dppkrk2022@gmail.com)

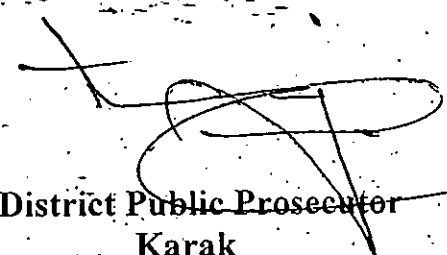
To

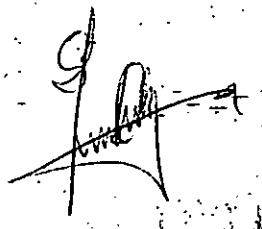
The Director General Prosecution,  
Govt. of Khyber Pakhtunkhwa,  
Peshawar.

Subject: APPLICATION OF SHAHEED ULLAH NAIB QASID IN  
RESPECT OF SENIORITY LIST.

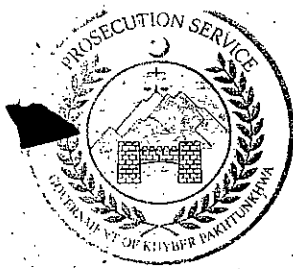
Dear Sir,

Please find herewith the enclosed application in respect of Shaheed  
Ullah, N/Q which is self explanatory for consideration please.

  
District Public Prosecutor  
Karak







27

**DIRECTORATE OF PROSECUTION  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT**

No.DP/ E. A 11(66)12824

Dated Peshawar the 17/10/2023

Office Landline#091-9212559

[dp.prosecution@kjp.gov.pk](mailto:dp.prosecution@kjp.gov.pk)

<https://prosecution.kp.gov.pk/>

<https://www.facebook.com/kpprosecution>

<https://twitter.com/kpprosecution>

To

**The Section Officer (Prosecution),  
Home and Tribal Affairs Department,  
Khyber Pakhtunkhwa, Peshawar.**

Subject: **DEPARTMENTAL APPEAL FOR CORRECTION OF SENIORITY LIST.**

Respected Sir,

I am directed to refer to your letter No. SO (Pros)/HD/ 1-28/Service Rules/2023 Dated: 09-10-2023 on the subject and to state that representation of Mr. Shaheed Ullah, Naib Qasid, District Public Prosecutor Office, Lakki Marwat has thoroughly been examined and as per office record his name has rightly been placed in the Final Seniority list of Class-IV issued in light of Minutes of the meeting dated 01-18-2023, hence, no illegality is found in the Final Seniority list.

In view of the above, request of the applicant is unjustifiable which may be filed without any further process, please.

Yours Sincerely,

Assistant Director Administration

Copy forwarded for information to the:

1. PA to Director General Prosecution, Khyber Pakhtunkhwa.

Assistant Director Administration



The PESHAWAR HIGH COURT Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58 Off: 9210135 Fax: 9210170

www.peshawarhighcourt.gov.pk info@peshawarhighcourt.gov.pk phcpsh@gmail.com

No: 6227-61 /SDJ/HRW/ADMIN

Dated Pesh the 30/03/2022

To

All the District & Sessions Judges/Zilla Qazis, Khyber Pakhtunkhwa.

Subject: GUIDELINES IN RESPECT OF MAINTAINING COMMON SENIORITY LIST OF NAIB QASIDS, SWEEPERS, CHOWKIDARS ETC. FOR THE PURPOSE OF PROMOTION TO THE POST OF JUNIOR CLERK

Dear Sir/Ma'am,

In continuation of this Court's letter No. 2315-49/SDJ/REG dated 29th April, 2019 (Page 503 & 504 of the Judicial Estacode 2021, Vol-II) with regard to maintaining common seniority list of the holders of various posts for promotion to the post of Junior Clerk, I am directed to say that in case where the officials in common seniority list have been appointed in two different batches with varying dates of acquisition of SSC, the official(s) appointed in the first batch will rank senior to the official(s) appointed in the subsequent batch, irrespective of their date of acquisition of SSC. Following illustration elucidates the situation.

If A, having acquired SSC in 2005, has been appointed in 2010 and; B, having acquired SSC in 2000, has been inducted in 2015; A will rank senior to B.

Sincerely yours,

[Handwritten signature]

AABID SARWAR ADDITIONAL REGISTRAR (ADMIN) FOR REGISTRAR 18.3.22

Endst No. 6262 SDJ/HRW/ADMIN

Dated Pesh the 30/03/2022

Copy forwarded to the District & Sessions Judge, Bannu, w/r to his letter No. 80/DSJ dated 19.01.2022.

No. 595 dt. 4.4.2022 Forwarded to the Senior Civil Judge Admin 1 smtc for information

AABID SARWAR ADDITIONAL REGISTRAR (ADMIN) FOR REGISTRAR 18.3.22

District & Sessions Judge Bannu 4/4/2022



29  
DIRECTORATE OF PROSECUTION  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
HOME & TRIBAL AFFAIRS DEPARTMENT

No. DP/E&A/1(100)13903

Dated Peshawar the 15/11/2023

Office Landline#091-9212559

[prosecution@kp.gov.pk](mailto:prosecution@kp.gov.pk)

<https://prosecution.kp.gov.pk/>

<https://www.facebook.com/kpprosecution>

<https://twitter.com/kpprosecution>

To

The Section Officer (Prosecution),  
Home & Tribal Affairs Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: REQUEST FOR NOMINATION OF MEMBER FOR  
DEPARTMENTAL PROMOTION COMMITTEE (DPC).

Respected Sir,

I am directed to refer to this office letter No. DP/E&A/1(100)13557 dated: 02-11-2023 on subject and to state that the Departmental Promotion Committee (DPC) meeting for promotion of "Class-IV to the post of Junior clerk (BPS-11)" is re-scheduled to be held on 17-11-2023 at 10:00 am in the office of Director General Prosecution, Directorate of Prosecution.

I am therefore, directed to request to attend the Departmental Promotion Committee (DPC) meeting on the scheduled date and time, please.

Yours faithfully,

Assistant Director Administration

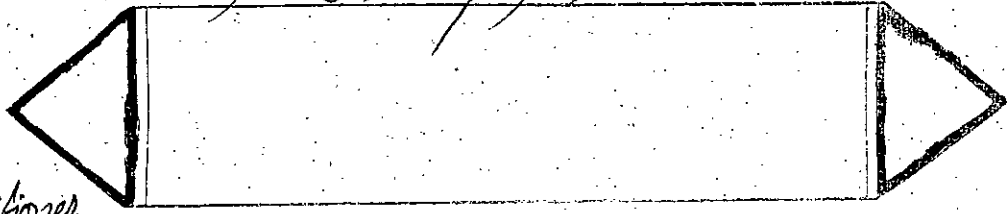
(Encl: as above)

Copy forwarded for information to the: -

1. Director Administration, Directorate of Prosecution.
2. PA to Director General Prosecution, Khyber Pakhtunkhwa.

Assistant Director Administration

بعد الت سرور کے لئے درخواستیں منظور



Appellant / Petitioner

Govt and others. نام Shaked Ullah

سورجہ  
مقدمہ  
دعوی  
نوم

باعث تحریر آنکہ

ذیشان  
ابو سعید

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیر کی اور جو اس پیر کی وکل کاروائی متعلقہ  
 آج ان مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو براہ حق نامہ کرنے و تقرر نامت و فیصلہ بر حلف دینے جازب رہی اور اقبال دعویٰ اور  
 بہدورت اذگری کرنے اجراء اور وصولی چیک، درو پیرا عرضی دہنی اور درخواست ہر قسم کی تقدیر  
 زرایں بردست خط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا اذگری منظر فیہ یا ایل کی برآمدگی اور منسوخی  
 نیز دائر کرنے اپیل گمرانی و نظر ثانی و پیردی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمزاد یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سامنے  
 پروا ختم منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے رہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیردی  
 مذکورہ کریں۔ لہذا ادا کاست نامہ لکھ دیا کہ مندر ہے۔

Shaked

شکیم اللہ ولد حاج علی خان  
سلنہ سوڈا کی فیصلہ و تحلیل سز  
14202-1352103-7

Attached  
as per  
prept

16 ماہ 11 20

ذیشان  
ابو سعید  
Shaked Ullah  
Govt and others