## <u>BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA</u> <u>PESHAWAR</u>

C.M.No.\_\_\_/2024

IN

Appeal No. 1365/2023

Shakel Ahmed.....Appellant

Versus

Director General Sports and others......Respondents

S.No.	Description of documents.	Annexure	Pages.
1.	Application for impleadment.		1-2
2.	Copy of Seniority List alongwith representation		3-8

INDEX

Applicant/ Appellant

Through

(W

Arbab Saif ul Kamal Advocate

## BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Χ\_

> APPLICATION FOR IMPLEADMENT OF MST. NAZIA ZAKI ASSISTANT DIRECTOR, SERVING AS DIRECTOR IN THE OFFICE OF DIRECTOR GENERAL SPORTS COMPLEX PESHAWAR CANTT, KP PESHAWAR AS RESPONDENT NO.13 IN THE PENEL OF RESPONDENTS.

Respectfully Sheweth;

- 1. That the appellant/ applicant has filed the instant service appeal before this Hon'ble Tribunal.
- That challenging the Seniority list dated 27.01.2023 stood on 18.01.2023, which is fixed for hearing today i.e. 01.02.2024.
- That during pendency of the instant appeal the official respondents has issued seniority list on 10.10.2023 stood on 18.08.2023 wherein Mst. Nazia Zaki has been placed at Serial No.1. (Copies attached).
- That in the interest of justice the said Mst. Nazia Zaki Assistant Director Sports be impleaded as respondent.

In view of the above, it is, humbly prayed that on acceptance of this application Mst. Nazia Zaki may kindly be impleaded as Respondent No.13 in the penal of respondents.

Applicant/ Appellant

Through

11

Arbab Saif ul Kamal Advocate

Date: 01.02.2024

## **AFFIDAVIT**

I, Shakel Ahmed (Applicant/ Appellant), do hereby solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Deponent



REGISTERED NO. PIIL

GAZETTE

GOVERNMENT

EXTRAORDINARY

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10th OGTOBER, 2023.

## **GOVERNMENT OF KHYBER PAKHTUNKHWA SPORTS & YOUTH AFFAIRS DEPARTMENT**

## NOTIFICATION

Peshawar Dated, the 10th October, 2023.

NO. SO (Sports)1-41/2023/1975-82: In pursuance of Section-8 (1) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following final seniority list of Assistant Directors, District Sports Officers and Administrators (BS-17) of Directorate General of Sports, Khyber Pakhtunkhwa as it stood on 18-08-2023 is hereby notified.

FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA

Eleven (11) Assistant Directors, Thirty-Five (35) District Sports Officer and Thirteen (13) Administrators (BPS-17) Total-sanctioned posts: 59

Filied: <u>27</u> 32 Vacant:

362

# 363 KHYBER-PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 10th OCTOBER, 2023

1.10 2000

والمتعدية والمعتدين فالمتحد والمتعورين

## FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS; DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA AS STOOD ON 18-08-2023

	Name of Officer with	Date of birth	Date of 1st			ient / promotion-to the ent posts	Present appointment with	Remarks
S.#	academic Qualifications	and domicile	entry into Govt. Service	Date	BPS	Method of recruitment	date	
1)	Mst. Nazia Zaki, M PED/ MBA	05-06-1986 Kurram	09-09-2013	09-09-2013	17	By regularization	Assistant Director 09-09-2013	Dy: Director (Estab:) o/o DG Sports
2)	Mr. Muhammad Jamshid, M.Sc.	05-05-1978 D.L.Khan	01-01-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Administrator o/o DSO Charsadda
3)	Mr. Muhammad Suleman, M.Sc.	01-04-1971 Dir Lower	06-06-1990	20-12-2017	17	By promotion	DSO 20-12-2017	District Sports Officer, Mohmand
4)	Mr. Anwar Kamal, B.A	27-03-1975 D.L.Khan	29-09-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Regional Sports Officer, D.1. Khan
5)	Mr. Amir Zahid Shah, M.Sc.	05-09-1967 Bannu	29-06-1992	20-12-2017	17	By promotion	DSO 20-12-2017	Dy. Director (operation) O/o Director General Soprts
6)	M.SC. Mr. Zakir Ullah, M.A/ M.Sc.	22-04-1977 Peshawar	29-09-2005	20-12-2017	17	By promotion	DSO 20-12-2017	Regional Sports Officer, Peshawar
7)	Mr.: Razi-Ullah Khan, M.A/ M.Sc.	01-10-1979 Tank	02-09-2002	20-12-2017	17	By promotion	DSO 20-12-2017	District Sports Officer, Tank
8)	Mr. Muhammad Ismail Khan, M.A/ M.Sc.	.02-06-1977 Banny	19-06-2005 -	08.03.2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Lakki Marwat
9)	Mr. Tariq Muhammad, MA/MSc.	22-10-1972 Swabi	26-06-1997	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Swabi
10)	Mr. Asad Khan, MA	20-05-1968 Mardan	20-03-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	AD o/o DG Sports Khyber Pakhtunkhwa
11)	Mr. Ahmad Zaman, M.Sc.	30-04-1980 Haripur	17-06-2009	08-03-2018	17	By Upgradation	DSO 08-03-2018	Regional Sports Officer, Abbottabad

- KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 10th OCTOBER, 2023 364

12)	MrMunir-Abbas, MBA	12-03-1984 Hangu	09-08-2006	08-03-2018	17	By Upgradation	DSO 08-03-2018	D.D (Dev:) (BPS-18) (OPS) o/o DG Sports Khyber Pakhtunkhwa
13)	Mr. Kashif Farhan, M.Phil	13-04-1984 Bannu	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Khyber
14)	Mr. Hazrat Ullah, PhD	01-01-1984 Karak	31-08-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Karak having additional charge Hangu
15)	Mrs. Gul Rukh Gulfam, M.Sc	01-06-1991 Abbottabad	29-09-2017	08-03-2018	17	By Upgradation	DSO 08-03-2018	District Sports Officer, Peshawar
16)	Mr. Amjad Iqbal, MSc Botany (Gold Medalist)	19-6-1967 Peshawar	15-8-1992	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	AD (Accounts) o/o DG Sports Khyber Pakhtunkhwa
17)	Mr. Shakil Ahmad, M.A	04-1-1971 Buner	18-1-2008	28-05-2019	17	By Promotion	Assistant Director 28-05-2019	Regional Sports Officer, Swat
18)	Mr. Hamid Ali, BIT (Hons:)	16-06-1985 Charsadda	14-07-2008	04-01-2022	17	By Promotion	Assistant Director 04-01-2022	Administrator, Mardan Sports Complex, Mardan
19)	Mr. Taj Muhammad, M.Sc (HPE)	07-07-1984 South Waziristan	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	Administrator, Swabi Sports Complex
20)	Mr. Noor Ullah, M.Sc (HPE)	09-08-1984 Sub- Division Bannu	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, South Waziristan
21)	Mr. Rahid Gul, M.Sc	24-08-1986 Khyber	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	AD (HQ) o/o DG Sports Khyber Pakhtunkhwa
22)	Mr. Saeed Akhtar, M.Sc (HPE)	10-03-1975 Mohmand	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022 -	District Sports Officer, Mardan
23)	Mr. Amjad Hussain, MSc. (Agriculture)	07-04-1977 Kurram	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, Kurram
24)	Mr. Sajid Khan, M.Sc (HPE)	15-01-1986 Sub- Division Kohat	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	DSO Kohat having additional charge of RSO Kohat
25)	Mr. Muhammad Hussain, BBA (Hon) & MSc. (HPE)	04-04-1990 Orakzai	13-01-2022	13-01-2022	17	By initial recruitment via Regularization Act-2021	DSO 13-01-2022	District Sports Officer, Orakzai

FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA AS STOOD ON 18-08-2023

### 365 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 10th OCTOBER, 2023

## FINAL JOINT SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS (BPS-17) OF THE DIRECTORATE GENERAL OF SPORTS, KHYBER PAKHTUNKHWA AS STOOD ON 18-08-2023

26)	Mr. Sheraz Khan Wazir, MCS	15-03-1985 North Waziristan	13-01-2022	13-01-2022	. 17	By initial recruitment via Regularization Act-2021		District Sports Officer, North Waziristan
27)	Mr, Irfanullah, MSc.	10-09-1977 Sub-Division Tank	13-01-2022	13-01-2022	17	By initial-recruitment via Regularization Act-2021	DSO 13-01-2022	Administrator, D.I. Khan Sports Complex

Note: -

The said seniority list is final, undisputed and not sub-judice in any court of law.

Secretary to Government of Khyber Pakhtunkhwa Sports & Youth Affairs Department

Printed and published by the Manager, Staty. & Ptg. Deptt., Khyper Pakhtunkhwa, Peshawar

Mar Se

بخدمت جناب چيف سيکرٹري خيبر پختونخواہ بمقام پشاور

عنوان: - محکمانها پیل برائے سینیارٹی کسٹ آسسٹنٹ ڈائر کیٹر، ڈسٹر کٹ سپورٹس آفیسر، ایڈمنسٹریٹر بحکمہ کھیل خیبر پختونخواہ بترا ریچ 25ھ چے - 18 \_\_\_\_ تیاریخ کو ٹیفی کیپیشن \_\_23 ہے - 0/- 0/

> جناب عالی! گزارش کی جاتی ہے کیہ

- 1۔ سال 2020 میں پہلاسینیارٹی کسٹ مورخہ 01/05/2020 کوشائع ہواجس پر میں نے مورخہ 22/06/2022 کواعتر اض جمع کیا مگرجواب ندارد۔(کابی لف ہے)
- 2۔ پھر محکمہ کھیل کے نوٹیفیکیشن نمبر 16-11/2020/2913-1(Sports)so(Sports) ہتاریخ 10/09/2020 کے تحت نظامت کھیل نے سینیارٹی لسٹ 17/Senoirty List/2021 بتاریخ 15/09/2021 شائع ہواجس پر میں بتاریخ 28/09/2021 عتر اض جمع مگر پھر بھی جوان ندراد۔(کا پی لف ہے)
- 3۔ پھرتیسرے مرتبہ سینارٹی کسٹ نمبر 17/Senoirty List/2021/5051 مورخہ 16/08/2022 کو شائع ہوا اُس پر میں نے تیسری مرتبہ مورخہ 29/08/2022 کو پھراعتر اض جنع کیا۔(کا یی لف ہے)

لیکن جناب سینیار ٹی لسٹ میں نازیہ زکی نام کی میڈیم کا نام شامل کیا گیا جو کہ مرج فاٹا سے تعلق رکھتی تھی میں نے اس پر بھی اعتراض جمع کیا۔اس بارے میں محکمہ کھیل نے جناب ڈائر کیٹر جنرل سپورٹس سے سر براہی میں ایک کمیٹی قائم کیا جس کے رپورٹ میں نازیہ زکی کوسینیا رٹی لسٹ سے خارج کرنے کی سفارش کی گئی۔(کاپی لف ہے)

4۔ سلمیٹی کے اس رپورٹ کے روشن میں مورخہ 18/01/2023 کو چوتھی مرتبہ سینیارٹی کسٹ شائع ہوااور مورخہ 21/01/2023 کو غیر متناز عہ سر ٹیفکیٹ دیا گیا ۔ جناب والا اس پر بھی میں نے بتاریخ 2023/101/01/اعتراض جمع کہا کیکن پھر بھی جواب ندراد۔(کایی لف ہے)

مندرجہ بالا رپورٹ کی روشن میں جب میری شنوائی نہ ہوئی تو پھر میں نے خیبر پختونخواہ سروس ٹریبۇل میں بتاریخ 17/06/2023 کوسروں اپیل فائل کیا جبکہ نظامت کھیل نے دوتاریخوں میں جواب بھی داخل نہیں کیا۔(کا پی لف ہے) جناب والا!

اس دوران پانچویں مرتبہ سینیارٹی لسٹ مورخہ 21/08/2023 کونا زیرز کی کا نام شامل کرتے ہوئے شائع کیا جس پر میں نے 01/09/2023 کو پھراعتراض جنع کیا۔(کا پی لف ہے) سروس اپیل کے باوجود حکمہ کھیل نے فائنل سینیارٹی لسٹ کوشائع کیا۔(کا پی لف ہے)

جناب والا!

اس فائنل سینیار ٹی لسٹ پر میرا اس تحکمانہ اپیل کوقبول کیا جائے اور فائنل سینیار ٹی لسٹ کوسروں ٹریپۇل کے فیصلہ تك رو كنے كى احكامات صا درفر مائىي تا كە مجھے میراحق مل جائے۔

July 181 BI

الرتوم:15/10/2023 كالى را فاطلاعها بى ۱) سیکرمری سپورٹ <u>ضیبہ ول</u>تو دواہ پیٹاور شكيل احمد ديجنل سيورش أفسرملا كندسوات y) مسلم من استبلیند. ط ضیب فیولواه کیشا ور 



312

Sports are essential for the development of a happy, healthy & vigorous society

DIRECTORATE GENERAL OF SPORTS

KHYBER PAKHTUNKHWA PESHAWAR SPORTS COMPLEX, PESHAWAR CANTT. Ph: # 9212767. Fax # 9212766

No. 17/Seniority List /Officers/2023/1665 Dated Peshawar, the 24<sup>th</sup> November, 2023.

То

The Secretary to Govt: of Khyber Pakhtunkhwa, Sports & Youth Affairs Department, Peshawar.

Subject: - DEPARTMENTAL APPEAL REGARDING SENIORITY LIST OF ASSISTANT DIRECTORS, DISTRICT SPORTS OFFICERS AND ADMINISTRATORS DIRECTORATE GENERAL SPORTS. (BPS-17) OF KHYBER PAKHTUNKHWA.

Dear Sir.

1 am directed to refer to your letter No. SO(Sports)1-41/Seniority list/2023/2868-72 dated 16-11-2023 on the subject noted above and to submit the comments/views on the application of Mr. Shakeel Ahmad, Regional Sports Officer, Swat as under:-

Paras 1-3. The statement of the applicant is correct.

Para 4. The statement of the applicant is correct. However, it is clarified that Ms. Nazia Zaki is employee of the erstwhile FATA Sports Directorate a subsidiary office of erstwhile FATA Education Directorate. No merger has so far been made.

Yours faithfully.

Additional Director Ceneral

## Endst: No. & date even.

A copy is forwarded to P.A. to Director General of Sports Khyber Pakhtunkhwa for information.

Additional Director General