

original

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.1992 of 2023

Ameer Nawaz, Depot Cooli
o/o District Director Agriculture,
Upper Chitral

VERSUS

Secretary to the Govt. of Khyber
Pakhtunkhwa Agriculture,
Department Peshawar & Others

INDEX

S.No	Description of Documents	Annexure	Page
1	Para-wise comments	--	1-3
2	Counter Affidavit	--	4
3	Seniority list stood on 01.01.2023	A	5-10
4	Notification dated 26.11.2023 Service Rules	B	11-12
5	Detail of Quota	C	13
6	Authority letter	D	14


DEPONENT

*one copy kholad
over to respondent
Muhammad Nouman.*

19-02-2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1992 of 2023
Ameer Nawaz, Depot Cooli
o/o District Director Agriculture, Upper Chitral

Diary No. 11227

Dated 19-02-2024

APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary Agriculture, Department, Civil Secretariat, Peshawar.
- 2- The Director General, Agriculture Extension Khyber Pakhtunkhwa, Peshawar.
- 3- The District Director Agriculture Upper Chitral.

RESPONDENTS

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

PRELIMINARY OBJECTIONS

Respectfully Sheweth:- That the respondents submit as under:-

- 1- That the instant appeal is baseless, frivolous and concocted based on malafide intentions and for ulterior motive, hence not tenable at all.
- 2- That the appellant wishes to waste the precious time of this Honorable Tribunal by filling the instant appeal.
- 3- That the appellant has got no prima facie to file the instant appeal.
- 4- That the appellant has deliberately concealed the important facts from this Honorable Tribunal.
- 5- That the instant appeal is not maintainable in its present form and liable to be dismissed.
- 6- That the appellant has no cause of action to file the instant appeal.
- 7- That the appellant has got no locus standi to file the instant appeal.
- 8- That the appellant has deliberately concealed the material fact from this Honorable Tribunal.
- 9- That the appellant has not come to this Honorable Service Tribunal with clean hands.

84

(1)

ON FACT PARA-WISE COMMENTS

(2)

- Para-1 Correct to the extent that the appellant was appointed as Depot Cooli BS-01 in the office of Respondent No. 3 Vide order dated 13.01.2009.
- Para-2 Correct to the extent that the appellant has got Master Degree from the University of Malakand.
- Para-3 Incorrect. The Respondent No.2 issued a Tentative Seniority list of Class-IV employees of Agriculture Extension Department Khyber Pakhtunkhwa as stood on 01.01.2022, which was circulated to all sub offices for information and necessary correction. The appellant did not file any appeal / application for correction against his name to the office of Respondent No.2 & 3.
- Para-4 Incorrect. Appeal of the appellant was accepted by Respondent No. 2 and the qualification of the appellant was changed from Matric to MA in the seniority list as stood on 01.01.2023. The name of appellant is at S.No.53 of the seniority list copy attached as **(Annexure-A)**.
- Para-5 Incorrect. As explained in Para-4 above.

GROUNDS

- Para-A Incorrect. The Govt. of Khyber Pakhtunkhwa Agriculture Department Peshawar amended the Service Recruitment Rules circulated vide Notification No. SOE (AD) 2(2) 429 / 2020 / EW/SSRC dated 26.11.2020 **(Annexure-B)**, wherein the criteria for promotion to the post of Junior Clerk BS-11 is mentioned at S.No.44. The appellant will be promoted on his own turn according to the seniority list of the post of Junior Clerk BS-11.
- Para-B Incorrect. Appellant has not been discriminated against by the respondents and no principles of natural justice have been violated.
- Para-C Incorrect. According to the quota reserved for Class-IV the Respondent No.2 promoted 16 out of 59 Class-IV employees. The remaining quota will be filled in as and when the post of Junior Clerk BS-11 becomes vacant. Statement showing detail of quota is attached as **(Annex-C)**.
- Para-D No comments, hence denied.
- Para-E Incorrect. Appellant has not been victimized by the respondents Department.
- Para-F Incorrect. Action and inaction of respondents department is not against the principles of natural justice and respondents have not violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- Para-G Incorrect. Detailed comments are given in Para-4 above.
- Para-H Incorrect. Detailed comments given in Para-A above.

It is hereby humbly prayed that on acceptance of the para wise comments, the appeal of the appellant may kindly be dismissed with cost.

It is hereby humbly prayed that on acceptance of the para wise comments, the appeal of the appellant may kindly be dismissed with cost.

Mohammad Javeed Marwat.

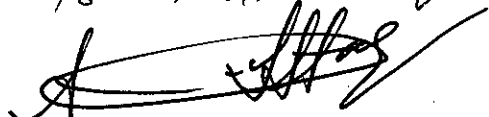


SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
AGRICULTURE DEPARTMENT, PESHAWAR
RESPONDENTS NO.1

Jam Mohammad

DIRECTOR GENERAL,
AGRICULTURE (EXTENSION)
KHYBER PAKHTUNKHWA, PESHAWAR
RESPONDENT NO.2

Islam-ul-Haq.



DISTRICT DIRECTOR AGRICULTURE
UPPER CHITRAL
RESPONDENT NO.3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

(4)

Service Appeal No. 1992 of 2023
 Ameer Nawaz, Depot Cooli
 o/o District Director Agriculture, Upper Chitral.

APPELLANTVERSUS

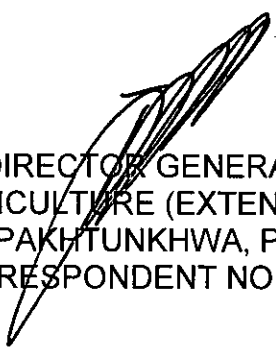
- 1- The Government of Khyber Pakhtunkhwa through Secretary Agriculture, Department, Civil Secretariat, Peshawar.
- 2- The Director General, Agriculture Extension Khyber Pakhtunkhwa, Peshawar.
- 3- The District Director Agriculture Upper Chitral.

RESPONDENTSCOUNTER AFFIDAVIT

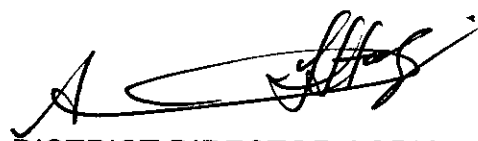
We the undersigned hereby solemnly declare / affirm that the contents of the Para-wise reply / comments are true and correct to the best of our knowledge and belief and nothing has been kept secret from this Honorable Tribunal.



SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
 AGRICULTURE DEPARTMENT, PESHAWAR
 RESPONDENTS NO.1

DIRECTOR GENERAL,
 AGRICULTURE (EXTENSION)
 KHYBER PAKHTUNKHWA, PESHAWAR
 RESPONDENT NO.2



DISTRICT DIRECTOR AGRICULTURE
 UPPER CHITRAL
 RESPONDENT NO.3

Amir - H.

**SENIORITY LIST OF MATRICULATE CLASS-IV GOVERNMENT SERVANT OF AGRICULTURE (EXTENSION) DEPARTMENT KHYBER
PAKHTUNKHWA, PESHAWAR AS STOOD ON 01.01.2023**

S.No	Name & Designation	Designation	Date of Birth	Date of appointment as class-IV	Qualification	Place of posting	Remarks
1.	Hazrat Qayum	N/Qasid	02.04.1963	06.07.1987	Matric	DDA Dir Lower	
2.	Allah Nawaz	Chowkidar	01.08.1965	09.12.1987	F.A	DDA D.I.Khan	
3.	Liaq Jan	S/Keeper	06.07.1969	13.08.1991	F.A	DDA (TD) Bajour	
4.	Muhammad Pervish	F/Worker	12.12.1968	06.10.1996	Matric	DDA Swat	
5.	Wahid Ullah	F/Worker	14.09.1980	01.07.2002	B.A	MA Peshawar	
6.	Shakeel Arshad	N/Qasid	05.01.1976	01.09.2002	B.A	MA Peshawar	
7.	Wahid Gul	Chowkidar	10.03.1982	29.07.2003	F.A	DDA Merged Areas	
8.	Qasim Khan	D/Keeper	30.09.1981	09.08.2003	Matric	DDA (TD) Khyber	
9.	Ishaq Zada	F/Worker	10.02.1972	16.10.2003	Matric	DDA Shangla	
10.	Muhammad Sadaqat	F/Worker	05.05.1984	04.02.2004	Matric	DDA Kohat	
11.	Muhammad Ishfaq Khan	Daftari	04.04.1975	13.04.2004	Matric	DDA A/ Abad	
12.	Muhammad Azam Khan	N/Qasid	06.08.1974	15.04.2004	Matric	DDA Dir Lower	
13.	Rahim Ullah	D/Cooli	03.07.1974	17.04.2004	M.A	DDA Dir Lower	
14.	Sher Muhammad	D/Cooli	01.05.1983	26.04.2004	Matric	DDA Swat	
15.	Said Azeem Khan	N/Qasid	02.01.1979	30.04.2004	Matric	DDA Dir Upper	
16.	Ehsan Ahmad (Masih)	Sweeper	06.04.1974	03.07.2004	B.A	ASA Peshawar	
17.	Muhammad Ismail	N/Qasid	10.04.1982	09.12.2004	F.A	DA Merged Areas	
18.	Muhammad Ismail	F/Worker	21.07.1980	11.06.2006	Matric	DDA Malakand	
19.	Niamat Ullah	F/Worker	01.05.1982	14.07.2006	M.A	DDA Charsadda	
20.	Muhammad Tahir	F/Worker	03.10.1973	29.07.2006	Matric	DDA Kohat	
21.	Faiz Ullah Khan	F/Worker	03.08.1981	14.11.2006	M.A	DDA D.I.Khan	
22.	Zaigham Abbas	F/Worker	03.08.1981	14.11.2006	M.A	DDA D.I.Khan	
23.	Muhammad Ramzan	Chowkidar	15.01.1988	22.11.2006	F.A	DDA D.I.Khan	
24.	Muhammad Ramzan	Chowkidar	15.01.1988	22.11.2006	F.A	DDA D.I.Khan	
25.	Atta Muhammad	F/Worker	04.02.1968	23.11.2006	Matric	DDA Batagram	
26.	Atta Muhammad	F/Worker	03.08.1977	23.11.2006	Matric	DDA Batagram	
27.	Muhammad Halim,	F/Worker	03.08.1977	23.11.2006	Matric	DDA Batagram	
28.	Muhammad Halim,	F/Worker	03.07.1987	23.11.2006	Matric	DDA Batagram	
29.	Zai Ullah Khan	F/Worker	03.07.1987	23.11.2006	Matric	DDA Batagram	
30.	Iftikhair Ahmad	N/Qasid	02.01.1980	08.12.2006	M.A	DDA Manshera	
31.	Iftikhair Ahmad	N/Qasid	02.01.1980	08.12.2006	M.A	DDA Manshera	
32.	Niaz Ali	F/Worker	03.08.1978	09.12.2006	Matric	DDA Nowshera	
33.	Muhammad Raheem	F/Worker	03.01.1975	19.02.2007	Matric	DDA Dir Lower	
34.	Muhammad Raheem	F/Worker	03.01.1975	19.02.2007	Matric	DDA Dir Lower	
35.	Mehmood Ul Haq	N/Qasid	01.03.1978	01.03.2007	BA	DDA Shangla	
36.	Mehmood Ul Haq	N/Qasid	01.03.1978	01.03.2007	BA	DDA Shangla	
37.	Saifullah	F/Worker	01.10.1981	21.03.2007	Matric	DDA Batagram	
38.	Saifullah	F/Worker	01.10.1981	21.03.2007	Matric	DDA Batagram	
39.	Shahid Ullah	F/Worker	10.01.1978	27.03.2007	MA	DDA Bannu	
40.	Shahid Ullah	F/Worker	10.01.1978	27.03.2007	MA	DDA Bannu	
41.	Raza Ullah	F/Worker	06.01.1982	21.03.2007	FSC	DDA Charsadda	
42.	Raza Ullah	F/Worker	06.01.1982	21.03.2007	FSC	DDA Charsadda	
43.	Sajid Ali	F/Worker	06.04.1985	07.07.2007	BA	DDA, Swabi	
44.	Sajid Ali	F/Worker	06.04.1985	07.07.2007	BA	DDA, Swabi	
45.	Muhammad Ibrahim	F/Worker	13.05.1988	10.08.2007	Matric	DDA DI Khan	
46.	Muhammad Ibrahim	F/Worker	13.05.1988	10.08.2007	Matric	DDA DI Khan	
47.	Javid Ali	F/Worker	16.02.1976	05.10.2007	Matric	DDA Kohat	
48.	Javid Ali	F/Worker	16.02.1976	05.10.2007	Matric	DDA Kohat	
49.	Shakireen	F/Worker	11.02.1980	05.10.2007	B.A	DDA Kohat	
50.	Shakireen	F/Worker	11.02.1980	05.10.2007	B.A	DDA Kohat	

37.	Muhammad Aslam	Chowkidar	20.03.1969	25.07.2007	Matric	DDA D.I.Khan
38.	Jehangir Shah	F/Worker	25.09.1978	27.05.2008	Matric	DDA Charsadda
39.	Abdul Waheed	F/Worker	02.09.1980	07.06.2008	Matric	DDA Nowshera
40.	Ayaz ud Din	F/Worker	15.08.1987	08.06.2008	Matric	DDA Kohat
41.	Imran Ullah	F/Worker	16.03.1988	14.06.2008	Matric	DDA Peshawar
42.	Muhammad Jan	F/Worker	15.01.1987	26.07.2008	Matric	DDA Charsadda
43.	Nisar Muhammad	N/Qasid	16.10.1989	03.08.2008	B.A	ASA Peshawar
44.	Haider Hayat	F/Worker	16.02.1986	04.08.2008	F.A	DDA Nowshera
45.	Noor Zeb Khan	F/Worker	15.05.1977	29.08.2008	F.A	DDA Bunner
46.	Aseem Khan	F/Worker	04.06.1979	29.08.2008	F.A	DDA Bunner
47.	Abdul Khalig	N/Qasid	14.10.1988	01.11.2008	F.A	DDA Tank
48.	Muhammad Ishtiaq	F/Worker	19.04.1985	17.11.2008	Matric	DDA Hangu
49.	Naeem Dad	N/Qasid	08.08.1978	02.12.2008	Matric	DDA D.I.Khan
50.	Tanveer Akhtar	N/Qasid	23.12.1989	01.01.2009	B.A	DDA Haripur
51.	Sajjad Ahmad	N/Qasid	09.01.1982	12.01.2009	B.A	DDA Karak
52.	Bashir Ahmad	F/Worker	01.02.1987	13.01.2009	F.A	DDA Chitral
53.	Amir Nawaz	D/Cooli	06.03.1987	13.01.2009	M.A	DDA Chitral
54.	Umar Hayat	Chowkidar	02.12.1979	18.01.2009	Matric	DDA Malakand
55.	Gul Zar	F/Worker	04.04.1978	20.01.2009	Matric	DDA Haripur
56.	Khan Dad	F/Worker	16.09.1974	28.01.2009	Matric	DDA Bunner
57.	Waheed Akhtar	F/Worker	04.11.1976	01.03.2009	Matric	DDA Haripur
58.	Shah Nawaz	F/Worker	15.03.1980	01.03.2009	Matric	DDA Haripur
59.	Saqib Mushtaq,	N/Qasid	22.06.1981	28.03.2009	B.A	DDA A/ Abad
60.	Adnan Ahmad	N/Qasid	28.12.1985	28.03.2009	Matric	DDA A/ Abad
61.	Muhammad Sulaiman	F/Worker	25.03.1985	04.04.2009	Matric	DDA Charsadda
62.	Irfan Ullah S/O Waheed Gul	F/Worker	08.09.1986	17.06.2009	F.Sc	DDA Charsadda
63.	Noor Rehman S/O Muhammad Nazir	F/Worker	12.04.1990	17.06.2009	F.Sc	DDA Mohmand
64.	Zareen Shah S/O Abdullah Shah	N/Qasid	01.01.1968	16.07.2009	Matric	DG Office
65.	Ubaid Ullah	F/Worker	02.05.1988	16.07.2009	B.A	DDA Bajour
66.	Shams ur Rehman	F/Worker	16.02.1987	26.08.2009	B.A	DDA D.I.Khan
67.	Hidayat Ullah	F/Worker	14.10.1987	29.10.2009	F.A	DDA Peshawar
68.	Inam Ullah	F/Worker	06.03.1976	05.11.2009	D.Com	DDA Bannu
69.	Muhammad Jan	F/Worker	10.05.1973	30.12.2009	Matric	DDA Charsadda
70.	Asif Khan	F/Worker	04.02.1990	06.01.2010	Matric	DDA Kohat
71.	Asif Ayaz	F/Worker	20.01.1990	21.01.2010	Matric	DDA, Swabi
72.	Shah Khalid	F/Worker	03.02.1990	27.01.2010	Matric	DDA, Swabi
73.	Irshad Ali	F/Worker	15.03.1991	03.02.2010	FA	DDA, Swabi
74.	Muhammad Dawood Jan	F/Worker	04.06.1974	05.03.2010	Matric	DDA Dir Upper
75.	Imran Khan	N/Qasid	01.04.1982	29.03.2010	Matric	DDA Charsadda
76.	Muhammad Dawood Jan	N/Qasid	06.04.1974	30.04.2010	Matric	DDA Dir Upper
77.	Shahid Ali	F/Worker	03.03.1988	21.05.2010	F.A	DDA Hangu
78.	Khurshed Ahmad	Sweeper	21.04.1982	11.06.2010	Matric	DDA Buner
79.	Khyal Muhammad	S/Keeper	04.04.1979	21.06.2010	Matric	DDA Buner
80.	Muhammad Saleem	Chowkidar	12.08.1974	23.06.2010	Matric	DDA Buner

*A list of
12/11/2010*

81.	Farman Ali	F/Worker	03.04.1987	12.07.2010	F.A	DDA Swat
82.	Mateen ur Rahman	F/Worker	18.03.1977	12.09.2010	Matric	DDA Manshera
83.	Sardar Bahader	F/Worker	15.08.1966	12.11.2010	Matric	DDA Manshera
84.	Mir Gul Shah Din	F/Worker	05.04.1979	01.01.2011	Matric	DDA karak
85.	Irshad Khan	F/Worker	06.03.1977	11.01.2011	Matric	DDA Mardan
86.	Muhammad Idress Bacha	N/Qasid	05.03.1984	11.01.2011	F.A	DDA Mardan
87.	Gul Siar	F/Worker	09.11.1978	12.01.2011	B.A	DDA Charsadda
88.	Suleman	S/Keeper	01.05.1989	01.02.2011	Matric	DDA, Buner
89.	Muhammad Javid	Chowkidar	01.02.1993	01.02.2011	Matric	DDA Dir Upper
90.	Dashat Khan	F/Worker	21.02.1993	22.02.2011	Matric	DDA D.I.Khan
91.	Syed Mati Ullah Shah	T/W Opt.	21.04.1982	24.03.2011	B.A	DDA Bannu
92.	Hidayat Ullah	F/Worker	07.05.1989	03.05.2011	F.A	DDA LakkiMarwat
93.	Waseem Khan	S/Keeper	01.02.1992	01.06.2011	Matric	DDA Nowshera
94.	Javed Iqbal	N/Qasid	16.04.1988	14.06.2011	F.A	DDA D.I.Khan
95.	Muhammad Shabir	F/Worker	19.03.1978	18.08.2011	Matric	DDA Manshera
96.	Gul Siayar	F/Worker	11.08.1978	01.12.2011	B.A	DDA Charsadda
97.	Tawab Ali	S/Keeper	06.04.1990	01.10.2011	B.A	DDA Buner
98.	Syed Shah Haroon	F/Worker	04.01.1981	21.12.2011	Matric	DDA Mardan
99.	Aurazaib	F/Worker	02.03.1983	21.12.2011	Matric	DDA Mardan
100.	Muhammad Javid	F/Worker	02.01.1993	02.01.2012	Matric	DDA Dir Upper
101.	Niamat Ullah	F/Worker	24.10.1986	03.01.2012	Matric	DDA Hangu
102.	Muhammad Shahid	F/Worker	22.03.1988	29.02.2012	F.A	DDA LakkiMarwat
103.	Pir Azam Jan	F/Worker	02.08.1994	14.03.2012	Matric	DDA Charsadda
104.	Syed Umar Ullah Shah	N/Qasid	08.07.1988	22.03.2012	F.A	ASA Peshawar.
105.	Imran Ali Khan	F/Worker	01.01.1987	24.03.2012	Matric	DDA Bunner
106.	Mian Zareen Shah	F/Worker	05.10.1991	24.03.2012	F.A	DDA Bunner
107.	Ashraf Ali	F/Worker	27.01.1985	26.04.2012	Matric	DDA Peshawar
108.	Amanat.Ur.Rehman	F/Worker	20.08.1986	26.04.2012	Matric	DDA Peshawar
109.	Asraf Ali	F/Worker	15.05.1984	26.04.2012	F.A	DDA Peshawar
110.	Mukhtiar Ali	Mess Boy	24.02.1981	28.04.2012	Matric	ASA Peshawar
111.	Aman Ullah	S/Keeper	01.02.1986	21.05.2012	BSc	Dir Agri Information
112.	Muhammad Waqas	F/Worker	09.08.1990	26.06.2012	Matric	DDA Charsadda
113.	Sajid Mehmood	Cleaner	05.03.1993	13.08.2012	Matric	DDA Kohat
114.	Doraj Khan	F/Worker	19.11.1992	17.09.2012	B.A	DDA Kohistan
115.	Sadbar Khan	F/Worker	24.02.1982	17.09.2012	B.A	DDA Kohistan
116.	Imran Ullah	F/Worker	09.08.1992	17.09.2012	Matric	DDA Kohistan
117.	Ghulam Ullah	Chowkidar	22.05.1988	17.09.2012	Matric	DDA Kohistan
118.	Aurangzaib	Chowkidar	04.10.1981	17.09.2012	F.A	DDA Kohistan
119.	Muhammad Shafi	F/Worker	05.01.1982	18.09.2012	Matric	AAO Mohmand
120.	Saiful Islam	F/Worker	03.06.1977	24.09.2012	Matric	DDA Batagram
121.	Zia Ullah	N/Qasid	22.04.1989	05.10.2012	Matric	DDA D.I.Khan
122.	Ameer Sohail	T/W Oper.	21.04.1994	20.11.2012	FA	DDA, DIKhan
123.	Haseeb Ahmad Raza	F/Worker	15.09.1990	22.11.2012	Matric	DDA Karak
124.	Farooq Khan	N/Qasid	14.06.1993	21.02.2013	F.A	DA(MA), Peshawar

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125.	Aftab Ali	F/Worker	05.02.1980	03.06.2013	Matric	DDA Mardan
126.	Tariq Muhammad	F/Worker	18.04.1979	01.01.2014	Matric	DDA Bunner
127.	Ali Rahman	N/Qasid	01.04.1989	21.03.2014	Matric	DDA Shangla
128.	Mohibullah	Typist	01.04.1990	19.05.2014	F.A	DDA Charsadda
129.	Sajeed Gul	Helper	06.01.1980	24.06.2014	Matric	DA (Information)
130.	Shahid Ali	F/Worker	15.02.1987	07.07.2014	Matric	DDA Nowshera
131.	Misbah Ullah	F/Worker	13.02.1992	07.07.2014	F.A	DDA Nowshera
132.	Zahoor Ahmad	N/Qasid	04.11.1978	07.08.2014	F.A	DGA Office
133.	Muhammad Zeeshan	O/Attendant	01.12.1992	27.08.2014	Matric	DDA D.I.Khan
134.	Tufail Ahmad	Cleaner	01.02.1971	30.10.2014	Matric	DDA Peshawar
135.	Sadaqatullah	N/Qasid	25.05.1994	07.11.2014	Matric	DG,Office
136.	Mutasimbillah	F/Worker	05.02.1995	26.12.2014	Matric	DDA Shangla
137.	Sahib Zada	F/Worker	20.07.1998	29.12.2014	F.A	DDA Shangla
138.	Iftikhar Ahmad	F/Worker	06.01.1983	06.01.2015		
139.	Sami Ur Rehman	N/Qasid	20.02.1994	12.01.2015	F.A	DDA Buner
140.	Mehar Nawaz	F/Worker	08.04.1971	11.02.2015	Matric	DDA D.I Khan
141.	MuhdSayyab	F/Worker	03.05.1992	24.02.2015	F.A	DDA Peshawar
142.	Raees Ahmad	Chowkidar	30.12.1992	01.05.2015	Matric	DDA Shangla
143.	Mehran Zaman	F/Worker	08.09.1994	04.06.2015	F.A	DDA Bannu
144.	Abdul Waheed	F/Worker	02.04.1991	17.06.2015	F.A	DDA Mardan
145.	Wasem Shah	F/Worker	07.03.1992	18.06.2015	Matric	DDA Kohat
146.	Mumtaz Jamal	Trasher Op.	10.03.1987	24.07.2015	Matric	DDA Dir Lower
147.	Muhammad Nazeer	Cook	01.01.1978	24.11.2015	Matric	ASA Peshawar
148.	Rizwan Ullah	F/Worker	21.11.1982	02.02.2016	Matric	DDA Karak
149.	Hilal Murad	F/Worker	08.09.1993	03.02.2016	Matric	DDA Charsadda
150.	Khalid Qudoos	F/Worker	11.04.1986	04.02.2016	Matric	DDA Karak
151.	Sabir Nawaz	F/Worker	10.08.1987	04.02.2016	Matric	DDA Karak
152.	Sadiq Ul Hassan	T/WOper:	17.02.1981	10.02.2016	Matric	DDA, DIKhan
153.	Qaiser Aziz	Chowkidar	07.04.1984	10.02.2016	FA	DDA, DIKhan
154.	Sher Baz,	F/Worker	09.02.1985	10.02.2016	Matric	DDA, DIKhan
155.	Muhammad Ali	T/Cleaner	25.03.1986	22.02.2016	Matric	DDA D.I.Khan
156.	Hasan Ali	F/Worker	17.10.1986	04.03.2016	Matric	DDA Nowshera
157.	Latif Ullah	F/Worker	02.07.1987	04.03.2016	Matric	DDA Nowshera
158.	Waqar Khan	F/Worker	01.09.1988	04.03.2016	B.A	DDA Nowshera
159.	Jawad Khan	F/Worker	06.03.1995	04.03.2016	Matric	DDA Nowshera
160.	Amir Nawaz	Chowkidar	01.01.1991	24.03.2016	Matric	DDA, Hangu
161.	Azher Shahzad	S/Guard	20.04.1987	04.04.2016	Matric	DDA BAI Peshawar
162.	Syed Ishfaq Aman	F/Worker	09.03.1985	11.04.2016	MSC	DDA Charsadda
163.	Muhammad Khalid	F/Worker	15.02.1986	08.08.2016	B.Ed	DDA, DIKhan
164.	Irfan Ullah	N/Qasid	11.07.1990	09.09.2016	B.A	DG Office
165.	Ghaffar Shah	F/Worker	06.07.1985	27.09.2016	B.A	DDA Batagram
166.	Saifullah	F/Worker	20.02.1985	25.01.2017	BA	DDA, Swat
167.	Ihsanullah	F/Worker	12.02.1986	25.01.2017	Matric	DDA, Swat
168.	Ali Aman	F/Worker	18.02.1993	01.03.2017	Matric	DDA, Peshawar

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9/12

169.	Muhammad Kamal	F/Worker	07.03.1998	17.06.2017	Matric	DDA, Mardan	
170.	Muht Naveed	N/Qasid	10.01.1989	13.07.2017	M.A	DDA, DIKhan	
171.	Ghulam Subhan	F/Worker	08.09.1978	07.09.2017	B.A	DDA D.I Khan	
172.	Ihsanullah	F/Worker	02.02.1983	20.09.2017	B.A	DDA Batagram	
173.	Irfan Shah	F/Worker	30.03.1997	20.09.2017	Matric	DDA Batagram	
174.	Tahir Iqbal	F/Worker	05.12.1986	03.10.2017	Matric	DDA, Kohat	
175.	Ajmal Khan	Attendant	02.04.1995	03.10.2017	Matric	DDA, Kohat	
176.	Salman Naeem	F/Worker	02.09.1991	19.12.2017	BA	DDA, Swat	
177.	Yousaf Khan Yousafzai	F/Worker	25.01.1978	21.12.2017	Matric	DDA, Peshawar	
178.	Manzoor Hussain	F/Worker	03.02.1983	21.12.2017	Matric	DDA, Peshawar	
179.	Muhammad Nadeem	F/Worker	15.04.1992	21.12.2017	Matric	DDA, Peshawar	
180.	Bilal Ahmad	F/Worker	02.01.1994	21.12.2017	Matric	DDA, Peshawar	
181.	Muhammad Asif Ullah	N/Qasid	24.03.1990	31.01.2018	B.A	DGA Office	
182.	Fahim Ullah	N/Qasid	13.04.1981	28.02.2018	B.A	RD DI Khan	
183.	Yar Said	F/Worker	01.01.1980	11.04.2018	Matric	DDA Swat	
184.	Mazhar Ur Rehman	T/WOper:	29.03.1989	04.07.2018	B.A	DDA D.I Khan	
185.	Shahzeb S/O Shah Faisal	F/Worker	30.03.1996	12.11.2018	BBA	DDA Kohat	
186.	Mohammad Arsalan	N/Qasid	04.05.1997	08.12.2018	F.A	RD DI Khan	
187.	Waqas Mehmood S/O Arshad Mehmood	F/Worker	07.04.1993	14.03.2019	B.A	DDA Kohat	
188.	Rahat Ali S/O Shaukat Ali	F/Worker	20.01.1991	21.05.2019	F.A	DDA Peshawar	
189.	Zaka Ullah	S/Guard	10.04.1979	29.05.2019	B.A	DDA Peshawar	
190.	Seemab Qureshi	N/Qasid	02.03.1997	19.07.2019	F.A	DDA DI Khan	
191.	Abdur Rasheed	Attendant	23.02.1995	19.07.2019	F.A	DDA DI Khan	
192.	Syed Kaleem Ullah	N/Qasid	01.02.1994	01.01.2020	F.A	BAI	
193.	Kashif Ali Khan	N/Qasid	11.09.1994	01.01.2020	F.A	BAI	
194.	Zahid Hamid	N/Qasid	12.09.2000	21.04.2020	B.A	RD DI Khan	
195.	Muhammad Irfan	N/Qasid	23.09.1989	17.07.2020	B.A	RD DI Khan	
196.	Adil Khan	F/Worker	12.04.1998	25.09.2020	F.A	DDA Peshawar	

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93
16

379

Endst. No. 8/29/Estt/ 6456-85 (GATE)

Dated Peshawar: the 13-3- /2023

Copy forwarded to: -

1. The Principal, Agriculture Services Academy, Peshawar.
2. The Director Agriculture Extension Merged Areas Hayatabad Peshawar.
3. All District Directors Agriculture in Khyber Pakhtunkhwa.

For information and necessary action:

DIRECTOR GENERAL



Amirul

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
 AGRICULTURE, LIVESTOCK, FISHERIES AND
 COOPERATION DEPARTMENT

NOTIFICATION

Peshawar, dated the November 26th, 2020

No. SOE(AD)2(2)429/2020/EW/SSRC: In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer Rules 1989, the Agriculture, Livestock, Fisheries and cooperation Department, in consultation with the Establishment Department and the Finance Department, hereby direct that in this department's Notification No.SOE(AD)2(2)429/2011, dated 20.04.2012, the following further amendments shall be made, namely.

AMENDMENTS

In the APPENDIX,-

- (a) in PART-I, under the heading "PROFESSIONAL STAFF".
- (i) against Serial No.4, in Columns No.2 and 5, for the existing entries, the following shall be substituted, namely:

2	5	
"Agriculture Officer / Public Relation & Publication Officer / Instructor (BPS-17)	(a)	Twenty-five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Agriculture Supervisors, with twenty years service as Agriculture Supervisor, Agriculture Inspector and Field Assistant; and
	(b)	Seventy-five percent by initial recruitment."

- (ii) against Serial No.5, in Columns No.2 and 3, for the existing entries, the following shall be substituted, namely:

2	3
"Instructor Islamiyat (BPS-17)	At least second Class Master's Degree in Islamiyat or equivalent qualification from a recognized university."

- (iii) against Serial No.6A, in Column No.5, for the existing, the following shall be substituted, namely:

5
"By promotion, on the basis of seniority-cum-fitness, from amongst the Agriculture Inspectors having twelve years service as Agriculture Inspector and Field Assistant,";

- (iv) against Serial No.7, in Columns No.2, 3 and 4, for the existing entries the following shall be substituted, namely;

2	3	4
"Artist (BPS-12)	(i) At least second class Higher Secondary School Certificate or equivalent qualification form a recognized board; and	18 to 30 years."

17/95

(ix) against Serial No.43, in Columns No.2, for the existing entries, the following shall be substituted, namely:

2
"Senior Auditor (BPS-14)"

(x) for Serial No.44, the following shall be substituted, namely:

1	2	3	4	5
"44	"Junior Clerk (BPS-11)	<p>(a) At least Second Class FA / F.Sc. or an equivalent qualification from recognized Board; and</p> <p>(b) A speed of 30 words per minute in typing and knowledge of computer in MS office</p>	18-30 years	<p>(a) Forty (40%) percent by promotion on the basis of seniority-cum-fitness, from amongst all Class-IV posts and Store Keeper, Typist, Depot Keeper and Laboratory Assistant with three years service as such having second class F.A. / F.Sc. or an equivalent qualification from recognized board The department maintained combined seniority list of the above officials on their initial regular recruitment.</p> <p>(b) Sixty (60%) percent by initial recruitment. Provided that: -</p> <p>i. If two or more official have acquired the FA/F.Sc. qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post.</p> <p>ii. Where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p> <p>Provided further that the condition of FA/F.Sc. or its equivalent qualification from a recognized board, as laid down at clause (a) shall not apply for a period till the expiration of period as specified in column No.5 against serial No.4 of the Establishment Department amendment Notification No. SOE-IV(E&D)/1-35/2014 dated 18.07.2019 to the existing matriculate incumbents of the post of all Class-IV as well as Store Keeper, typist, Depot Keeper and Laboratory Assistants including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11)."</p>

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**STATEMENT SHOWING THE DETAIL OF QUOTA AND APPOINTMENT OF JUNIOR CLERK (BS-11)
AGRICULTURE EXTENSION DEPARTMENT, KHYBER PAKHTUNKHWA**

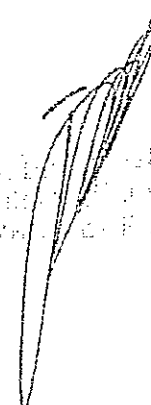
TOTAL SENCTION STRENGTH OF JUNIOR CLERKS IS 179

S.No.	Reserved Quota	Percentage Quota	Actual Quota	Appointment against quota	Remaining Quota to be observed	Remarks
1.	2 % Disabled	3.58	04	01	03	Did not appoint due to Ban
2.	5% Minority	8.95	09	03	06	Did not appoint due to Ban
3.	10 % Woman	17.90	18	0	18	Did not appoint due to Ban
4.	60% Initial Recruitment	88.80	89	122	+ 33	Over and above due to observance of Deceased/ Medical Board Out Son Quota.
5.	40% Class – IV	59.20	59	16	43	

Share of Each category, against 38 Vacant Seats

S.No.	Reserved Quota	Share
1.	2 % Disabled	01
2.	5% Minority	02
3.	10 % Woman	04
4.	60% Initial Recruitment	0
5.	40% Class – IV	12
	Qouta over to Initial 33 plus above	19

Only 1 Candidate of Class-IV has lodged a case in Court, namely Amir Nawaz of District Chitral.


 Director (BS-11) (A) (M)
 Agriculture Extension Department
 K.P.A. Peshawar



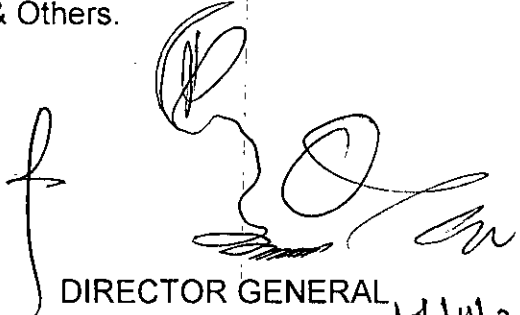
Annexure-C
 B-16

(14)

DIRECTORATE GENERAL, AGRICULTURE EXTENSION
KHYBER PAKHTUNKHWA, PESHAWAR

AUTHORITY LETTER

Mr. Asad Ud Din Asif Jah, HQ Office is hereby authorized for attending, vetting the para wise comments and submission of para wise comments in the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar in Service Appeal No.1992 of 2023 titled Ameer Nawaz v/s Govt. of Khyber Pakhtunkhwa through Secretary Agriculture & Others.


DIRECTOR GENERAL
H/M/23