

Cost of Rs. 2000 received in Service Appeal No. 1475/23,

Titled Shumal Khan VS. M. Gudi

in the office of Superintendent Vide Order 21/2/24

Dated: 4/3/2024,



SUPERINTENDENT
Khyber Pakhtunkhwa
Service Tribunal, Feshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR CAMP AT DERA ISMAIL KHAN.

Appeal No 1475 of 2023

Shumal Khan

VERSUS

Government Of Khyber
Pakhtunkhwa and Others

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Deponent

Engr: Muhammad Aqeel Azhar
Superintending Engineer
DIKhan Irrigation Circle DIKhan
CNIC# 12 101-93340-9

①

24

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP AT DERA ISMAIL KHAN.**

APPEAL NO. 1475 OF 2023.

Shumal Khan

Appellant

Versus

Government of Khyber Pakhtunkhwa and others.

Respondents.

Para-wise reply by the respondents.

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 11559

Dated 04-03-2024

Respectfully sheweth

The preliminary objections,

- 1) That the instant appeal is not maintainable.
- 2) That the appellant has got no cause of action.
- 3) That the appellant is estopped to file instant appeal.
- 4) That the appellant is bad for misjoinder and non-Joinder of parties.
- 5) That the appellant has not come to this Honorable Tribunal with clean hands.

ON FACTS.

Para-1. It pertains to record.

Para-2. Incorrect. Joint seniority list of Revenue Inspectors and Head Vernacular Clerks as it stood on 31/12/2022, was issued according to the Service Rules / policy of the Irrigation Department, notified vide Notification No.SO (E) IRR:/23-5/73 dated 17th February, 2011 (Annexure-A) according to the seniority. Revenue Inspectors are also employees of the Irrigation Department and they are senior to the Head Vernacular Clerks.

Para-3. Incorrect. The existing Service Rules / policy of the Irrigation Department, notified with the prior approval of the competent authority in the year 2011. Now, after lapse of about twelve years, the Appellant who is Head Vernacular Clerk, in Irrigation Department, has challenged the instant rule / policy of the Irrigation Department which is time barred.

Para-4. Incorrect. Prior to the challenged joint Seniority List of Revenue Inspectors and Head Vernacular Clerks, Joint seniority lists as it stood on 31/12/2021 and 31/12/2022 were also issued by the competent authority which was circulated amongst all the concerned officials including Appellant. But the Appellant did not challenge those joint seniority list at that time.

Para-5. Appellant has not come to this Honourable Tribunal with clean hands and also the instant Appeal is time barred. Hence the instant Appeal is not maintainable and in-competent. Moreover, the present Appellant is estopped due to his own conduct to bring the present Appeal and also concealed material facts from the Hon'ble Court. The Appellant has no legal grounds in support of his instant Appeal.

ON GROUNDS.

Para-1. Incorrect. As stated above the existing Service Rules / policy of the Irrigation Department, notified with the prior approval of the competent authority in the year 2011. No one had challenged these rules at that time. Now, after lapse of about twelve years, the Appellant who is Head Vernacular Clerk, in Irrigation Department, has challenged the instant rule / policy of the Irrigation Department which is time barred.

Para-2. Incorrect. As stated above. Joint seniority list of Revenue Inspectors and Head Vernacular Clerks as it stood on 31/12/2023, was issued according to the Service Rules / policy of the Irrigation Department, notified vide Notification No.SO (E) IRR:/23-5/73 dated 17th February, 2011, according to the seniority. Revenue Inspectors are also employees of the Irrigation Department and they are senior to the Head Vernacular Clerks.


Para-3. Incorrect. Revenue Inspectors were appointed for the supervision of Patwaris of Irrigation Department towards recovery of Abiana Dues. Moreover, they themselves also visit in the field for the recovery of Abiana Dues and achieved best results in this regard. Revenue Inspectors are well experience, well conversant with the record of Patwaris and deserve for promotion as Zilladar on their own turn according to the seniority-cum-fitness, under the existing Service Rules of the Irrigation Department.

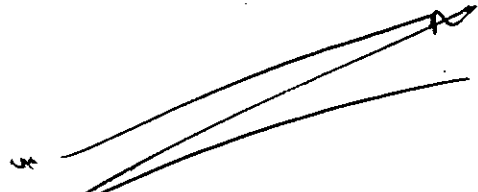
Para-4. Incorrect. The facts have been explained above.

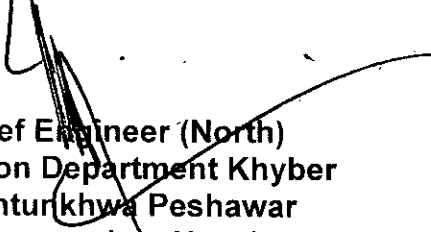
Para-5. According to the decision of the competent authority, the task of recovery of Abiana Dues was assigned to the Revenue Department, Khyber Pakhtunkhwa and services of Revenue Inspectors along with some Patwaris of the Irrigation Department were placed at the disposal of concerned Deputy Commissioners of the District for the purpose of recovery of Abiana Dues. However, task of recovery of Abiana Dues was once again assigned to the Irrigation Department. vide Revenue & Estate Department Notification No. Recovery-of-Abiana/2020-21/19500-547, dated 29/08/2023 and, in compliance of the decision of competent authority, Revenue Inspectors and Patwaris were relieved by Revenue Department and they were directed to report to concerned authorities of the Irrigation Department. Now, Revenue Inspectors are performing their duties under the supervision of authorities of Irrigation Department.

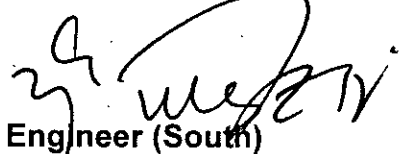
Para-6. Appellant has not come to this Honourable Tribunal with clean hands and also the instant Appeal is time barred. Hence the instant Appeal is not maintainable and in-competent. Moreover, the present Appellant has estopped due to his own conduct to bring the present Appeal and also concealed material facts from the Hon'ble Court. The Appellant has, no legal grounds in support of his instant Appeal.


In view of above, it is prayed that the instant Appeal, which is not maintainable and time barred, may please be dismissed with cost.


Superintending Engineer
 DIKhan Irrigation Circle DIKhan
 (Respondent No. 6)
 (Engr: Muhammad Aqeel Azhar)


Superintending Engineer (H.Qrs)
 Irrigation Department, Peshawar
 (Respondent No. 5)
 (Engr: Khalid Khatak)


Chief Engineer (North)
 Irrigation Department Khyber
 Pakhtunkhwa Peshawar
 (Respondent No. 4)
 (Engr: Muhammad Ishaq)


Chief Engineer (South)
 Irrigation Department Khyber
 Pakhtunkhwa Peshawar
 (Respondent No. 3)
 (Engr: Muhammad Yasin)

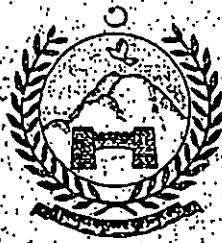

Secretary,
 Irrigation Department, Peshawar.
 (Respondent No. 2)
 (Mr: Muhammad Tahir Aurakzai)

Anexx(A)

3

EXTRAORDINARY
GOVERNMENT

REGISTERED NO. PIII
GAZETTE



KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, SATURDAY, 2ND APRIL, 2011.

GOVERNMENT KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT,

NOTIFICATION

Dated Peshawar, the 17th February, 2011

NO.SO(E)IRR/23-5/73: In pursuance of the provisions contained in sub rule (2) of Rule-3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous rules and notifications, issued in this behalf, except Notification No.SO(E)IRR/23-5/73 dated 20-12-2006, the Irrigation Department, in consultation with the Establishment Department and the Finance Department hereby lays down, the method of recruitment, qualification and other conditions specified in columns No. 3 to 5 of the Appendix (pages 1 to 5) to this Notification which shall be applicable to the posts in column No. 2 of the Appendix.

Secretary to Government of the Khyber Pakhtunkhwa Province
Irrigation Department.

688

Printed and published by the Manager,
Staty. & Ptg. Deptt., Khyber Pakhtunkhwa, Pesh.

Attached.

[Signature]
Deputy collector
Irrigation

689 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 2ND APRIL, 2011.

Handwritten signature/initials

APPENDIX

S#	Nomenclature of Post	Qualification for appointment	Age Limit	Method of recruitment
1	2	3	4	5
PART-I-ENGINEERING STAFF				
1.	Chief Engineer/ Director General (BPS-20)			By selection, on merit from amongst the Senior Superintending Engineers and Directors with at least seventeen years service in BPS-17 and above; possessing Degree in B.E/BSc Engineering (Civil) from a recognized University.
2.	Superintending Engineer/Director. (BPS-19)			By promotion, on the basis of seniority-cum-fitness, from amongst the Executive Engineers/Deputy Directors with at least twelve years service in BPS-17 and above.
3.	Executive Engineer/ Deputy Director (BPS-18)			By promotion, on the basis of seniority cum fitness, from amongst the Sub Divisional Officers, Assistant Engineers and Assistant Directors possessing Degree in B.E/BSc Engineering (Civil or Mechanical) from a recognized University, with at least five years service as such, and have passed the Profession or Revenue Examination under the prescribed rules.
4.	Assistant Engineer/Sub Divisional Officer/ Assistant Director (BPS-17)	BE/BSc Degree in Civil/Mechanical Engineering from a recognized University	21 to 32 years	<ul style="list-style-type: none"> a. Sixty five percent by initial recruitment. b. ten percent by promotion, on the basis of seniority cum fitness, from amongst the Sub Engineer's who has acquired during service degree in Civil or Mechanical Engineering from a recognize university. c. five percent by promotion, on the basis of seniority cum fitness, from amongst the Sub Engineer's who joined service as degree holders in Civil/Mechanical Engineering and d. twenty percent by promotion; on the basis of seniority-cum-fitness from amongst the Sub Engineer's, who hold a diploma of Civil, Mechanical, Electrical or Auto Technology and have passed Departmental Grade A examination with ten years service as such.
5.	Sub Engineer (BPS-11)	Diploma of Associate Engineering in Civil/Mechanical/Auto/Electrical Technology from a recognized Institute.	18 to 30 years	<p>Note: - Provided that where candidate under Clause (b) & (c) above is not available for promotion, the vacancy shall be filled in by initial recruitment.</p> <ul style="list-style-type: none"> a. Eighty percent by initial recruitment; and b. Twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Canal Inspectors, Work Takers, Gauge Readers, Surveyors and other establishments having Diploma of Associate Engineering in Civil, Mechanical, Electrical or Auto Technology from a recognized institute or Board of Technical Education of Government with at least ten years service, and have passed the departmental Grade B and Grade A examination.

6	Geologist (BPS-17)	MSc. Geology from a recognized University with 03 years experience in the relevant field.	18 to 32 years.	By initial recruitment.
PART-II-MINISTERIAL ESTABLISHMENT-				
7	Administrative Officer/ Budget and Accounts Officer (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst the Superintendents of the Department having at least three years service.
8	Superintendent (BS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants, Head Clerks and Senior Scale Stenographers with at least five years service as such. Note 1: For the purpose of promotion, a joint seniority list of Assistants and Senior Scale Stenographers shall be maintained. If the date of appointment of both the officials is the same, then Assistant shall rank senior. Note 2: Promotion to the post of Superintendents in Regional Office cadre shall be considered from amongst the Assistants, Head Clerks and Senior Scale Stenographers of Regional Office cadre and that of Circle Office Cadre from the Assistants, Head Clerks and Senior Scale Stenographers of Circle Office Cadre.
9	Senior Scale Stenographer (BPS-15)	a. Bachelor's Degree/ B.Com from a recognized University; and b. A speed of 100 words per minute in short hand in English and 40 words per minute in English typing.	18 to 30 years.	a. Forty percent by initial recruitment; and b. sixty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Junior Scale Stenographers with at least three years service as such.
10	Assistants/Head Clerk (BPS-14)	Second Class Bachelor's Degree with Economics/ Statistics as one of the subject or B.Com, from a recognized University.	18 to 30 years.	<u>In Regional Office Cadre</u> a. Twenty five percent by initial recruitment; and b. seventy five percent by promotion, on the basis of the seniority cum fitness, from amongst Accounts Clerks and Senior Clerks in Regional Office Cadre with at least 5 years service as such. <u>In Circle Office Cadre</u> By promotion, on the basis of seniority cum fitness, from among the Accounts Clerks and Senior Clerks with at least 5 years service as such, in the Circle where the vacancies occurs.

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11	Junior Scale Stenographer (BPS-12)	(a) Intermediate or D.Com From a recognized Board; and (b) A speed of 50 words per minute in Short hand in English and 35 words per minute in English typing with computer knowledge of Microsoft Words and Excel.	18 to 30 years	By Initial Recruitment.
12.	Accounts Clerk/ Senior Clerk (BPS-9)			By promotion, on the basis of seniority cum fitness, from among the Junior Clerks with atleast 5 years service in the respective regional or Circle cadre as such; Note: Promotion to the post of Accounts Clerk or Senior clerk in Regional Office cadre shall be considered from amongst the Junior Clerks of Regional Office Cadre and that of Circle Office Cadre from amongst the Junior Clerks of Circle Office Cadre).
13.	Junior Clerk (BPS-7)	(a) Secondary School Certificate from a recognized Board; and (b) A speed of 30 words per minute in English typing.	18 to 30 years	(a) Sixty Seven percent by initial recruitment; and (b) Thirty three percent by promotion, from amongst the Daftaries, Record Lifters, Naib Qasids, Chowkidars and other equivalent posts who have Secondary School Certificate and are under 45 years of age and have at least two years service as such in the respective Regional and Circle Office Cadre. Note For the purpose of promotion, there shall be maintained a joint seniority list of Daftaries, Record Lifters, Naib Qasids, Chowkidars with reference to the date of regular appointment to the post or that of acquiring the Secondary school certificate which ever is later, provided that if two dates are the same, the person older in age or having longer service, whichever is more beneficial to him, shall rank senior.
PART-III COMPUTER ESTABLISHMENT				
14	Data Processing Supervisor (BPS-14)	Bachelor's Degree from a recognized University with 03 years Diploma in Computer Science, from recognize Institute	18 to 30 years	(a) Twenty five percent by initial recruitment; and (b) Seventy five percent by promotion, on the basis of seniority cum fitness, from amongst the Data Entry Operators and Key Punch Operators with five years service as such.

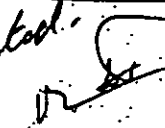
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KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 2ND APRIL, 2011.

15	Data Entry Operator/Key Punch Operator (BPS-12)	Intermediate with one year Diploma in computer science from a recognize institute with speed of 10000 key depression per hour.	18 to 30 years	By initial recruitment.
PART-IV. REVENUE ESTABLISHMENT				
16	Canal Collector (BPS-18)			By promotion, on the basis of seniority cum-fitness, from amongst the Deputy Collectors and Assistant Land Reclamation Officers with five years service as such.
17	Deputy Collector / Assistant Land Reclamation officer (BPS-17)			By promotion, on the basis of seniority-cum-fitness, from amongst Zilladars with atleast five years service as such.
18	Zilladar (BPS-14)	Bachelor's degree or equivalent qualification from a recognized University.	21 to 30 years	(a) Seventy percent by initial recruitment; and (b) thirty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Head Vernacular Clerks with six years experience and Vernacular Clerk/Revenue Inspector with ten years service and having passed Secondary School Certificate Examination from recognized Board. Note: Promotion of Head Vernacular Clerks (BPS-7) to the post of Zilladar (BPS-14) shall be considered only in the circle where no post of Head Vernacular Clerk (BPS-10) exist.
19	Revenue Inspector (BPS-10)	Intermediate or equivalent qualification from a recognized Board.	18 to 30 years	By initial recruitment.
20	Head Vernacular Clerk (BPS-10)			By promotion, on the basis of seniority-cum-fitness, from amongst the Vernacular clerks in the circle where the vacancies occur.
21	Vernacular Clerk (BPS-7)	Secondary School Certificate, from a recognized Board.		By promotion, on the basis of seniority-cum-fitness, from amongst the Patwaris having five years service as such in the Circle where the vacancies occur.
22	Patwari (BPS-5)	Secondary School Certificate from a recognized Board with one year Patwar training in Irrigation Department and have passed Irrigation Patwar Examination.	18 to 35 years	By initial recruitment.
PART-V DRAWING ESTABLISHMENT.				
23	Chief Draftsman (BPS-17)			By promotion, on the basis of seniority-cum-fitness; from amongst the Circle Head Draftsman with three years service as such.

Attested


KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 2ND APRIL, 2011.

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24	Circle Head Draftsman (BPS-16) (BPS-16)			By promotion, on the basis of seniority-cum-fitness, from amongst the Divisional Head Draftsman with three years service as such.
25	Divisional Head Draftsman (BPS-13)			By promotion, on the basis of seniority-cum-fitness, from amongst the Draftsman, who have passed the prescribed departmental examination for appointment as Head Draftsman with three years service as such.
26	Draftsman (BPS-10)	(a). Secondary School Certificate from a recognized Board; and (b). Two years Certificate course in Civil Draftsmanship from a recognized Institute/Board of Technical Education.	18 to 30 years.	a. Fifty percent by initial recruitment; b. twenty five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Tracers having Certificate of Civil Draftsman course of two years duration from a recognized Board of Technical Education with three years service as such; and c. twenty five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Tracers who have qualified the prescribed Departmental Examination of Draftsman and having three years service as such. Note: - If no suitable candidate is available for promotion against the quota at (b) then the vacancy shall be filled in by the way as prescribed at (c) and Vice Versa.
27	Tracer (BPS-5)	(a) Secondary School Certificate from recognized Board; and (b) Tracer Course of at least six months duration from a recognized Institute or Board of Technical Education.	18 to 30 years	By Initial Recruitment.

Attended
[Signature]



KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, MONDAY, 25TH JUNE, 2012.

**GOVERNMENT OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT.**

NOTIFICATION

Dated: 25th June, 2012.

No. SOE/IRRI/23-5/2010-11. — In pursuance of the provisions contained in sub-rule (2) of rule-3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Irrigation Department in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO(E)Irr./23-5/73 dated 17.02.2011, the following amendments shall be made namely:-

AMENDMENTS

In the Appendix,

Against Serial No. 4, in column No. 5, for the existing entries, in clause (b), (c) and (d), the following shall be respectively substituted, namely:

(b) twelve percent by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers, having degree in Civil Engineering or Mechanical Engineering from a recognized university and have passed departmental grade B&A examination with five year service of such.

Note- For the purpose of Clause (b), a Joint seniority list of the Sub Engineers having Degree in Civil Engineering or Mechanical Engineering shall be maintained and their seniority is to be reckoned from the date of their 1st appointment as Sub Engineer.

(c) eight percent by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers, having Degree in B. Tech. (Hons) and have passed departmental Grade B and A examination with five years service as such; and

Note- For the purpose of clause (c), a seniority list of Sub Engineers having Degree in B. Tech. (Hons), shall be maintained and their seniority is to be reckoned from the date of their 1st appointment as Sub Engineer.

(d) fifteen percent by promotion, on the basis of seniority-cum-fitness, from amongst the Sub Engineers, who hold a Diploma of Associate Engineer in Civil, Mechanical, Electrical or Auto Technology and have passed departmental Grade B and A examination, with five years service as such.

Note- For the purpose of clause (d), a seniority list of Sub Engineers having Diploma of Associate Engineering in Civil Mechanical, Electrical, or Auto Technology shall be maintained and their seniority is to be reckoned from the date of their 1st appointment as Sub Engineer.

Attended
[Signature]

Note- The quota of clause (b), (c) and (d), above respectively shall be filled in by initial recruitment, if no suitable Sub Engineer is available for promotion;

ii. against serial No. 5, in column No. 5, for the existing entries in clause (b), the following shall be substituted, namely:

✓(b) fifteen percent by promotion, on the basis of seniority-cum-fitness, from amongst the Canal Inspectors, Work Takers, Gauge Readers, Surveyors, having Diploma of Associate Engineering in Civil, Mechanical, Electrical or Auto-Technology from a recognized Board of Technical Education, having passed the departmental Grade-B and Grade-A examination, with at-least seven years service as such; and

✓(c) five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Canal Inspectors, Work Takers, Work Munshi, Surveyors, and work superintendent, having passed the departmental Grade-B examination with at-least ten years service as such;

iii. Against serial No. 7, in column No. 5, for the words "three years" the words "one year" shall be substituted;

iv. against serial No. 9, in column No. 3, for the existing entry the following shall be substituted, namely:

- a. Bachelor Degree or equivalent qualification from a recognized University; and
- b. A speed of 80 words per minute in short hand in English and 40 words per minute in English typing; and

v. against serial No. 13, in column No. 5, in clause (b), the words and figures "and are under 45 years of age" shall be deleted.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT.

Attached

[Handwritten signature]

Printed and published by the Manager,
Slaty. & Ptg. Deptt., Khyber Pakhtunkhwa, Pesh.



(11)

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE AND ESTATE DEPARTMENT

Dated: 29 August, 2023

NOTIFICATION

No. Recovery of Abiyana/2020-21/19300 ⁵⁶⁷ Consequent upon the approval granted by the care taker Chief Minister Khyber Pakhtunkhwa, collection of Abiyana (Arrears Included) is hereby transferred from Board of Revenue to Irrigation Department. The Irrigation Department shall henceforth carryout both assessment and collection of water charges (Abiyana) as per past practice.

Sd/-
Secretary to Government of Khyber Pakhtunkhwa
Revenue & Estate Department

Endst: No. & Date as above.

Copy of the above is forwarded to:-

1. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. The Secretary to Government of Khyber Pakhtunkhwa, Irrigation Department.
3. The Secretary to Government of Khyber Pakhtunkhwa Finance Department.
4. All the Divisional Commissioners, Khyber Pakhtunkhwa.
5. All Deputy Commissioners, Khyber Pakhtunkhwa.
6. The PSO to Chief Secretary, Khyber Pakhtunkhwa.
7. The SPS to Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
8. The Assistant Secretary (Receipt), Board of Revenue, Khyber Pakhtunkhwa.


DEPUTY SECRETARY-I

Attached -

M. S.

REVENUE AND ESTATE DEPARTMENT
BOARD OF REVENUE
GOVERNMENT OF KHYBER PAKHTUNKHWA



Dated: 17 August 2023

NOTIFICATION

No. Recovery of Whyaan\2020-21\1172 - Consequent upon the approval granted by the care taker Chief Minister Khyber Pakhtunkhwa, collection of Whyaan (areas included) is hereby transferred from Board of Revenue to Irrigation Department. The Irrigation Department shall henceforth carryout both assessment and collection of water charges (Whyaan) as per past practice.

Secretary to Government of Khyber Pakhtunkhwa
 Revenue & Estate Department

Encl: No. & Date as above.

Copy of the above is forwarded to:-

1. The Provincial Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. The Secretary to Government of Khyber Pakhtunkhwa, Irrigation Department.
3. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department.
4. All the Divisional Commissioners, Khyber Pakhtunkhwa.
5. All Deputy Commissioners, Khyber Pakhtunkhwa.
6. The PSO to Chief Secretary, Khyber Pakhtunkhwa.
7. The SPS to Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
8. The Assistant Secretary (Receipt), Board of Revenue, Khyber Pakhtunkhwa.


 DEPUTY SECRETARY

[Handwritten notes]

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR CAMP AT DERA ISMAIL KHAN.

Appeal No 1475 / 2023

Shumal Khan

VERSUS

Government Of Khyber
Pakhtunkhwa and Others

AFFIDAVIT

I, Engr: Muhammad Aqeel Azhar, Superintending Engineer DIKhan Irrigation Circle DIKhan do hereby solemnly affirm and declare on oath that the Parawise comments of the Service Appeal are correct to the best of my knowledge and belief and that nothing has been concealed or mis-stated.

it is further stated on oath that the consworn respondent have neither place evidence nor their defence struck off.

ADJESTED
Oath Commissioner
DIKhan



Deponent

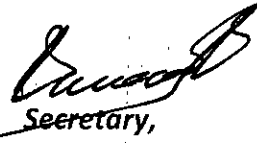
Engr: Muhammad Aqeel Azhar
Superintending Engineer
DIKhan Irrigation Circle DIKhan
CNIC# 12101-973340-9

20/

12

AUTHORITY LETTER

I do hereby authorized Mr. Muhammad Aslam Deputy Collector Paharpur Irrigation Division DIKhan to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp at DIKhan on behalf of the undersigned in connection with appeal No. 1475 of 2023 "Shumal Khan V/S Government of Khyber Pakhtunkhwa & others" on each hearing date.

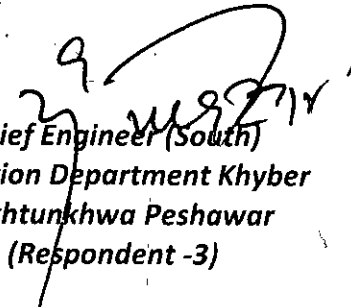


Secretary,
Irrigation Department Government
of Khyber Pakhtunkhwa Peshawar
(Respondent -2)

13

AUTHORITY LETTER

I do hereby authorized Mr. Muhammad Aslam Deputy Collector Paharpur Irrigation Division DIKhan to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp at DIKhan on behalf of the undersigned in connection with appeal No. 1475 of 2023 "Shumal Khan V/S Government of Khyber Pakhtunkhwa & others" on each hearing date.


Chief Engineer (South)
Irrigation Department Khyber
Pakhtunkhwa Peshawar
(Respondent -3)

(14)

AUTHORITY LETTER

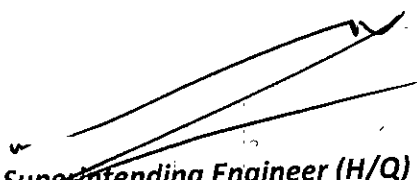
I do hereby authorized Mr. Muhammad Aslam Deputy Collector Paharpur Irrigation Division DIKhan to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp at DIKhan on behalf of the undersigned in connection with appeal No. 1475 of 2023 "Shumal Khan V/S Government of Khyber Pakhtunkhwa & others" on each hearing date.

*Chief Engineer (North)
Irrigation Department Khyber
Pakhtunkhwa Peshawar
(Respondent -4)*

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AUTHORITY LETTER

I do hereby authorized Mr. Muhammad Aslam Deputy Collector Paharpur Irrigation Division DIKhan to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar Camp at DIKhan on behalf of the undersigned in connection with appeal No. 1475 of 2023 "Shumal Khan V/S Government of Khyber Pakhtunkhwa & others" on each hearing date.


**Superintending Engineer (H/Q)
Irrigation Department Khyber
Pakhtunkhwa Peshawar
(Respondent -5)**



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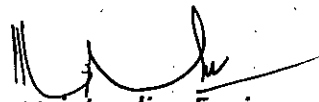
IV

**OFFICE OF THE SUPERINTENDING ENGINEER
DIKHAN IRRIGATION CIRCLE DIKHAN**

Phone & Fax No. 0966-9280238
Email: sedikirrigation@gmail.com

AUTHORITY LETTER

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**Superintending Engineer
DIKhan Irrigation Circle DIKhan
(Respondent -6)**