

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1649/2023

Arbab Muhammad Ahtisham.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

INDEX

S.NO.	PARTICULARS	ANNEXURE	PAGE NO
1.	Parawise Comments of the Commission with Affidavit		1-3
2.	Copy of PSC Advertisement 01/2015	A	4
3.	Copies of PSC Recommendation Letters	B	5-9
4.	Copy of Inter-Se-Merit and Seniority	C	10-12
5.	Copy of Rule 17(1)(a) of the Civil Servants Appointment, Promotion and Transfer Rules 1989	D	13-14

6. Authority Letters

15



Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission Peshawar

06-03-2024

Peshawar
D.B.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1649/2023

Arbab Muhammad Ahtisham.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 06Khyber Pakhtunkhwa
Service Tribunal

Entry No. 11629

Dated 06-03-2024

**RESPECTFULLY SHEWETH:
PRELIMINARY OBJECTIONS:**

1. That the instant Service Appeal is not maintainable against the replying respondent.
2. That the appellant has got no locus standi / cause of action.
3. That the instant Service Appeal is bad for mis-joinder / non-joinder of necessary parties.
4. That the appellant has got no locus standi or cause of action against the replying respondents.

ON FACTS:

1. Pertains to record / proof, needs no comments.
- 2-4. That the Khyber Pakhtunkhwa Public Service Commission advertised eighty nine (89) posts of Assistant Public Prosecutor (BPS-17) vide Advertisement No. 01/2015 S.No. 58, 59, 60 and 61 with the following Qualification: -

QUALIFICATION: (i) L.L.B at least 2ND Division from any recognized University and (ii) License from the Bar Council.

AGE LIMIT : 23 to 32 years.

PAY SCALE : BPS-16

ELIGIBILITY : Both Sexes.

ALLOCATION: Open Merit.

(Annex-A)

The appellant amongst other candidates also applied for the ibid posts. After conduct of Ability test and interview, the Recommendations for the ibid posts were forwarded to the requisitioning department (**Annex-B**). Since all the quotas i.e. General, Female, Disable and Minority Quota were advertised under the

same Advertisement, therefore, as per practice in vogue a combined Inter-Merit and Seniority was prepared and conveyed to the department (Annex-C). Moreover, it is pertinent to reproduce Rule 17(1)(a) of the Civil Servants (Appointment, Promotion and Transfer Rules, 1989) below for ready reference:

"In the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission 2[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection."

(Annex-D)

The candidates have been given due place in accordance with the merit orders.

Thus no illegality has been committed by the replying Respondent.

5-6. Does not pertain to replying respondent.

7. Incorrect. The appellant being not aggrieved person from any act of the replying Respondent may not be allowed to raise further grounds.

GROUND.

A-C) As far as the Khyber Pakhtunkhwa Public Service Commission is concerned, no illegality has been committed by it as explained in paras 2-4 of the facts.

D) No provision of the Constitution has been violated by the Khyber Pakhtunkhwa Public Service Commission.

E) As explained in preceding paras

F-G) Does not pertain to the replying Respondent.

It is, therefore, most humbly prayed that in light of the submissions made herein above the instant Service Appeal may kindly be dismissed with cost.

**CAPT. SIKANDER QAYYUM (RETD.)
CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
(RESPONDENT NO.06)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1649/2023

Arbab Muhammad Ahtisham.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

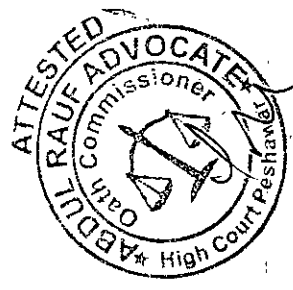
AFFIDAVIT

I, Capt. Sikander Qayyum (Retd.) Chairman Khyber Pakhtunkhwa Public Service Commission Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying Para-wise comments are correct and true to the best of my knowledge and belief, nothing has been concealed from this Honorable Tribunal and the answering respondent have neither been placed ex-parte nor defense has been struck off *costs*.

Sikander Q.

DEPONENT
CNIC: 17301-1277842-3
Phone: 091-9213500

Phllh



06-03-24

9

**KHYBER PAKHTUNKHWA PUBLIC SERVICE
COMMISSION**

2- Fort Road Peshawar Cantt:

Annex 'A'

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Dated: 01.01.2015

ADVERTISEMENT No. 01 / 2015.

Applications, on prescribed form, are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa / F.A.T.A by **30.01.2015** (candidates applying from abroad by **13.02.2015**). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall be rejected.

58.	<p>SEVENTY SIX (76) POSTS OF ASSISTANT PUBLIC PROSECUTOR IN DIRECTORATE OF PROSECUTION.</p> <p>QUALIFICATION: (i) L.L.B at least 2ND Division from any recognized University and (ii) License from the Bar Council.</p> <p>AGE LIMIT: 23 to 32 years. PAY SCALE: BPS-16 ELIGIBILITY: Both Sexes. ALLOCATION: 19 to Merit, 13 each to Zone-1, Zone-2, and Zone-3, and 09 each to Zone-4 and Zone-5.</p>
59.	<p>NINE (09) POSTS OF FEMALE ASSISTANT PUBLIC PROSECUTOR</p> <p>QUALIFICATION: (i) L.L.B at least 2ND Division from any recognized University and (ii) License from the Bar Council.</p> <p>AGE LIMIT: 23 to 32 years. PAY SCALE: BPS-16 ELIGIBILITY: Female. ALLOCATION: Open Merit.</p>
60.	<p>TWO (02) POSTS OF ASSISTANT PUBLIC PROSECUTOR (DISABLED QUOTA).</p> <p>QUALIFICATION: (i) L.L.B at least 2ND Division from any recognized University and (ii) License from the Bar Council.</p> <p>AGE LIMIT: 23 to 32 years. PAY SCALE: BPS-16 ELIGIBILITY: Both Sexes. ALLOCATION: Open Merit.</p>
61.	<p>TWO (02) POSTS OF ASSISTANT PUBLIC PROSECUTOR (MINORITY QUOTA).</p> <p>QUALIFICATION: (i) L.L.B at least 2ND Division from any recognized University and (ii) License from the Bar Council.</p> <p>AGE LIMIT: 23 to 32 years. PAY SCALE: BPS-16 ELIGIBILITY: Both Sexes. ALLOCATION: Open Merit.</p>

Attested
By
Law Officer
KPPSC

(Sharif Hussain)
Secretary
Khyber Pakhtunkhwa
Public Service Commission
Peshawar

Phone : 091-9213551
Fax : 091-9211795
Website : www.ppsc.org.pk



**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

No. PSC/SR-VI/ 030315
Dated: 15-06-2016

CONFIDENTIAL

To,

The Secretary to Govt. of Khyber Pakhtunkhwa,
Home and Tribal Affairs Department, Peshawar.

Subject:

**RECRUITMENT TO SEVENTY SIX (76) POSTS OF ASSISTANT PUBLIC
PROSECUTOR (B-16) IN DIRECTORATE OF PROSECUTION ADV: NO.
01/2015 S.NO. 58.**

Dear Sir,

I am directed to refer to this office letter No.PSC/SR-VI/013042-43 dated 21.03.2016 on the subject noted above and to state that the Commission recommends the following to the Government for appointment against the subject cited posts:-

S.No	Name with Father's Name	Domicile/Zone
1.	Rashid Ahmad S/O Munawar Khan	Dir Upper/3
2.	Asif Zeb S/O Jehan Zeb	Peshawar/2
3.	Farman Ullah S/O Jangi Mar Khan	SWA/1
4.	Fahim Ullah Khan S/O Jamshed Khan	Charsadda/2
5.	Waheed Ullah S/O Fazli Wahid	Dir Lower/3
6.	Zulfiqar Ali S/O Arsala Khan	Peshawar/2
7.	Kamran Aamir S/O Muhammad Ismail Khan	Bannu/4
8.	Zeeshan Taj S/O Taj Muhammad	Manshra/5
9.	Adnan Iqbal S/O Muhammad Jehangir	FR Kohat/1
10.	Sadeeq Anjum S/O Shams ul Qamar	Peshawar/2
11.	Muhammad Kamran S/O Shamsul Islam	Mardan/2
12.	Muhammad Latif Shah S/O Muhammad Hanif	Dir Lower/3
13.	Asad Anwar Khan S/O Muhammad Anwar Khan	L.Marwat/4
14.	Kamran Ullah S/O Rizwan Ullah	Peshawar/2
15.	Javed Yousaf S/O Muhammad Yousafi	Haripur/5
16.	Sheeraz Akbar S/O Ali Akbar	Moh: Agy/1
17.	Nazia Parveen D/O Mir Qasim Khan	Swabi/2
18.	Haroon Khan Safi S/O Muhammad Jamil Safi	Moh: Agy/1
19.	Ataullah S/O Alangeer Khan	Battagram/3
20.	Haroon Rashid S/O Abid Ullah	Tank/4
21.	Muhammad Usman Ali S/O Malik Muhammad Pervaiz	Abbottabad/5
22.	Sikandar Zaman S/O Nadar Khan	Charsadda/2
23.	Habib ur Rehman Orakzai S/O Abdul Hannan	Orakzai Agy/1
24.	Shah Saud S/O Abdul Ghaffar	Peshawar/2
25.	Mukhtyar Ahmad S/O Khybareen	Shangla/3
26.	Sohail Ahmad S/O Fida Muhammad	Mardan/2
27.	Sharif Ullah S/O Said Rasool	SWA/1
28.	Muhammad Saqib S/O Jan Muhammad	Peshawar/2
29.	Abdul Waheed S/O Abdul Hamid Khan	MKD Agy/3
30.	Muhammad Ali Shah S/O Muhammad Gul	Mardan/2
31.	Israr Ahmed S/O Abdul Ghaffar	Bannu/4
32.	Khuram Shahzad S/O Abdul Hakeem	Manshra/5
33.	Zohaib Ahmed Sher S/O Muhammad Sher Khan	NWA/1
34.	Umer Mehmood S/O Jehan Zeb Khan	Swabi/2
35.	Imran Khan S/O Parvez Khan	Swabi/2
36.	Mujeeb ur Rahman S/O Mahtab Khan	Buner/3
37.	Muhammad Sohail Khan S/O Hamid Ullah Khan	D.I.Khan/4
38.	Umar Zeb S/O Ikhranj	Peshawar/2
39.	Yasir Hussain S/O Muhammad Ishaque	Manshra/5
40.	Liaqat Khan S/O Sher Bahader	Moh: Agy/1
41.	Fazal Qayyum S/O Hidayat Shah Khattak	Charsadda/2
42.	Arshad Ali S/O Gul Muhammad	Mardan/2
43.	Muhammad Shoaib S/O Hazrat Bilal	Swat/3
44.	Tanseer Ali Mehdi S/O Altaf Hussain	D.I.Khan/4

Attended
Law Officer
KPPSC

6



45.	Imran Khan S/O Wilayat Khan		Haripur/5
46.	Minhaj Khan S/O Nasrullah Khan		Mardan/2
47.	Muhammad Shoaib S/O Rehman Gul	X	Moh: Agy/1
48.	Nigar Ahmad S/O Nazir Muhammad		Mardan/2
49.	Islah ud Din S/O Zaki ud Din		Dir Lower/3
50.	Becnish Gul D/O Muhammad Sakhi		Peshawar/2
51.	Hassan Khan S/O Talib Khan		Moh: Agy/1
52.	Daulat Khan S/O Gul Meer		Charsadda/2
53.	Asad Ullah S/O Khurshid Kamal		Swat/3
54.	Imran Ali S/O Liaqat Ali		Mardan/2
55.	Mudassar Hussain S/O H. Muhammad Rashid		D.I.Khan/4
56.	Bushra Ashraf D/O Muhammad Ashraf		Abbottabad/5
57.	Shehryar Khan S/O Ayub Khan		FR Peshawar/1
58.	Taimur Khan S/O Noor Muhammad		Mardan/2
59.	Sana Ajmal D/O Ajmal Khan		Swabi/2
60.	Amjad Ali S/O Muhammad Hamayun Khan		Battagram/3
61.	Sardar Ali S/O Haji Pakar Khan		Peshawar/2
62.	Lubna Shahzadi D/O Aurang Zeb		Abbottabad/5
63.	Farman S/O Raz Wali Khan		Moh: Agy/1
64.	Noshervan Khan S/O Ayub Khan		Peshawar/2
65.	Hayat Khan S/O Yousaf Khan		Peshawar/2
66.	Imtiaz Alam Khan S/O Said Maroof Khan	X	Swabi Gadoon/3
67.	Muhammad Shahab Alam Shah S/O Zahir Shah	?	D.I.Khan/4
68.	Haras Khan S/O Khalid Khan		Mansehra/5
69.	Junaid Alam S/O Khan Ghalib		Mardan/2
70.	Manzoor Khan S/O Waris Khan		Moh: Agy/1
71.	Syed Abdul Mujeeb S/O Syed Tilawat Shah		Charsadda/2
72.	Shakir Ullah Khan S/O Alif Khan		MKD Agy/3
73.	Amjad Ali S/O Khurshed Gul		Charsadda/2
74.	Muhammad Arif S/O Arsala Khan		Moh: Agy/1
75.	Arbab Muhammad Ahtisham S/O Arbab Muhammad Jahanzeb		Peshawar/2

2. Recommendation in favour of the recommendees is provisional subject to their medical fitness and verification of all the documents / testimonials etc: by the department.
3. Recommendation in respect of nominees, namely, Mr.Rashid Ahamd S/O Munawar Khan, Mr.Muhammad Latif Shah S/O Muhammad Hanif, Mr.Sohail Ahmad S/O Fida Muhammad, Mr.Muhammad Saqib S/O Jan Muhammad, Mr.Mudassar Hussain S/O Haji Muhammad Rashid and Miss Sana Ajmal D/O Ajmal Khan appearing at S.No.01, 12, 26, 28, 55 and 59 respectively is further provisional subject to decision of the Supreme Court of Pakistan in CP NO.663-P/2015, Government of KP VS Sana Ajmal and others.
4. Recommendation in respect of one (01) selectee will be conveyed later on.
5. Inter-se-Merit/ Zonal adjustment of all (76) recommendees will be conveyed later on.
6. Original applications (with enclosures) of the above (75) recommendees are enclosed herewith for your record.
7. Kindly acknowledge receipt the same.

Yours faithfully,

(GHULAM DASTAGIR AHMAD)
Director Recruitment

gc
14/6/16

Encl: As above.

Attested
Law Offices
KPPSC

7

**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.



The Secretary to Government, Khyber Pakhtunkhwa,
Home and Tribal Affairs Department,
Peshawar.

Subject: RECRUITMENT TO (02) POSTS OF ASSISTANT PUBLIC PROSECUTOR
(B-16) MINORITY QUOTA ADVT: NO. 01/2015 S.NO.61.

Dear Sir,

I am directed to refer to your letter No. SO(Pros)/HD/1-13/2015 Vol-XI dated 03.07.2015 on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment against the subject cited posts being Minority Quota: -

Merit Order	Name with father's Name	District / Zone
01	Huma D/O Danial Murad	Peshawar/2
02	Suncela D/O James Masih	Swabi/2

2. Recommendation in favour of the recommendees is provisional subject to their medical fitness and verification of all the documents / testimonials by the department.
3. Original applications (*with enclosures*) of the above two (02) recommendees are enclosed herewith for your record.
5. Kindly acknowledge receipt the same.

Yours faithfully,

(GHULAM DASTAGIR AHMAD)
Director Recruitment

Encl: As above.

AS(J), AS(J)
Attested
Law officer
KAPSC
h

Phone : 091-9213551
Fax : 091-9211795
Website : www.kppsc.gov.pk



**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

No. PSC/SR-VII

093247

Dated: 30-07-2015



To:

The Secretary to Govt. of Khyber Pakhtunkhwa,
Home and Tribal Affairs Department,
Peshawar.

Subject: **RECRUITMENT TO (02) POSTS OF ASSISTANT PUBLIC PROSECUTOR
(B-16) DISABLE QUOTA ADVT. NO. 01/2015 S.NO.60.**

Dear Sir,

I am directed to refer to your letter No. SO(Pros)/IID/1-4/2015/Vol- I dated 03.07.2015 on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment against the subject cited posts being Disable Quota: -

Merit Order	Name with father's Name	District / Zone
01	Muhammad Usman Ali S/O Fayyaz ur Rehman	Peshawar/2
02	Haider Ali S/O Hazrat ur Rehman	Mardan/2

2. Recommendation in favour of the recommendees is provisional subject to their medical fitness and verification of all the documents / testimonials by the department.
3. Original applications (*with enclosures*) of the above two (02) recommendees are enclosed herewith for your record.
5. Kindly acknowledge receipt the same.

Yours faithfully,

(GHULAM DASTAGIR AHMAD)
Director Recruitment

Encl: As above.

SO (Pros)
30/07/2015 AS(J)

AS(J)
R

Attended
Law Officer
KAPSC

Phone 091-9213551
Fax 091-9211795
Website www.kppsc.gov.pk

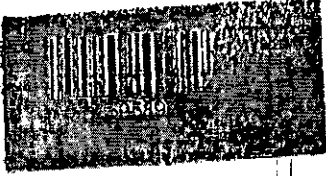
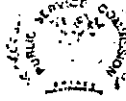
92

CONFIDENTIAL

**KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION**
2-Fort Road, Peshawar Cantt.

No. PSC/SR-VI/154510

Dated: 17-12-2015



To,

The Secretary to Govt. of Khyber Pakhtunkhwa,
Home and Tribal Affairs Department,
Peshawar.

Subject: **RECRUITMENT TO NINE (09) POSTS OF ASSISTANT PUBLIC
PROSECUTOR (B-16) (FEMALE QUOTA) IN HOME AND TRIBAL
AFFAIRS DEPARTMENT ADVT: NO. 01/2015 S.NO.59.**

Dear Sir,

I am directed to refer to this office letter No. PSC/SR-VI/15359 dated 17.09.2015 and letter No. PSC/SR-VI/139428 dated 10.11.2015 on the subject noted above and to state that the Commission recommends the following candidates to the Government, for appointment against the subject cited posts being Female Quota: -

Merit Order	Name with father's Name	District / Zone
01	Sidra Aslam D/O Muhammad Aslam	Haripur/5
02	Uzma Nasir D/O Nasir Khan	Peshawar/2
03	Meena Qaisar D/O Qaisar Khan	Nowshera/2
04	Andalceb Shabeer D/O Shabeer Ahmad	Manshera/5
05	Huma Farid D/O Farid Ullah Khan	Charsadda/2
06	Saba Jabeen D/O Muhammad Israr Khan	Dir/3
07	Fozia Durrani D/O Iftikhar Hussain	Peshawar/2
08	Parveen Gul D/O Mian Gul	Peshawar/2
09	Syeda Alvina Shah D/O Syed Azhar Ali Shah Bukhari	Peshawar/2

2. Recommendation in favour of the recommendees is provisional subject to their medical fitness and verification of all the documents / testimonials by the department. However miss Huma Farid D/O Farid Ullah Khan and Miss Parveen Gul D/O Mian Gul appearing in Merit No.5 and 8 respectively recommended conditionally subject to final decision of CPEA by the Supreme Court of Pakistan.

Original applications (with enclosures) of the above Nine (09) recommendees are enclosed herewith for your record.

Kindly acknowledge receipt the same.

Yours faithfully,

(GHULAM DASTAGIR AHMAD)

AS (S)

is (S)/So(Prosi)

12-15

Keep on Records.

Attested
Law Officer
KPPSC



Amir C.

BT

KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

APPENDIX-A

COMBINED INTER-SE-MERIT OF 89 POSTS OF ASSISTANT PUBLIC PROSECUTOR (B-17) (GENERAL/FEMALE/DISABLE AND MINORITY QUOTAS) OF ADVERTISEMENT NO. 01/2015 S.NO.58, 59, 60 AND 61.

Merit order	Name with Father's Name	Domicile/Zone	Adjustment
1.	Sidra Aslam D/O Muhammad Aslam	Haripur/5	Female Quota
2.	Asif Zeb S/O Jehan Zeb	Peshawar/2	General Seats
3.	Rashid Ahmad S/O Munawar Khan	Dir (U)/3	General Seats
4.	Waheed Ullah S/O Fazal Wahid	Dir (L)/3	General Seats
5.	Farman Ullah S/O Jangi Mar Khan	SWA/1	General Seats
6.	Uzma Nasir D/O Nasir Khan	Peshawar/2	Female Quota
7.	Fahim Ullah Khan S/O Jamshid Khan	Charsadda/2	General Seats
8.	Zulfiqar Ali S/O Arsala Khan	Peshawar/2	General Seats
9.	Sadeeq Anjum S/O Shams ul Qamar	Peshawar/2	General Seats
10.	Muhammad Kamran S/O Shamsul Islam	Mardan/2	General Seats
11.	Kamran Ullah S/O Rizwan Ullah	Peshawar/2	General Seats
12.	Sheeraz Akbar S/O Ali Akbar	Moh: Agy/1	General Seats
13.	Haroon Khan Safi S/O Muhammad Jamil Safi	Moh: Agy/1	General Seats
14.	Sikandar Zaman S/O Nadar Khan	Charsadda/2	General Seats
15.	Shah Saud S/O Abdul Ghaffar	Peshawar/2	General Seats
16.	Sohail Ahmad S/O Fida Muhammad	Mardan/2	General Seats
17.	Muhammad Saqib S/O Jan Muhammad	Peshawar/2	General Seats
18.	Meena Qaiser D/O Qaiser Khan	Nowshera/2	Female Quota
19.	Zeeshan Taj S/O Taj Muhammad	Mansehra/5	General Seats
20.	Andaleeb Shabeer D/O Shabeer Ahmad	Mansehra/5	Female Quota
21.	Ata Ullah S/O Alamgeer Khan	Battagram/3	General Seats
22.	Muhammad Ali Shah S/O Muhammad Gul	Mardan/2	General Seats
23.	Umer Mehmood S/O Jehan Zeb Khan	Swabi/2	General Seats
24.	Mukhtyar Ahmad S/O Khybareen	Shangla/3	General Seats
25.	Zohaib Ahmad Sher S/O M. Sher Khan	N.W.A/1	General Seats
26.	Imran Khan S/O Parvez Khan	Swabi/2	General Seats

total marks 66 +

total marks 64 +

Attended
Law Offices
KPSC

(Cont: P/2.....)

27.	Abdul Waliqod S/O Abdul Hamid Khan	MKD Agy/3	General Seats
28.	Mujeeb Ur Rahman S/O Mahtab Khan	Buner/3	General Seats
29.	Umer Zeb S/O Ikhranj	Peshawar/2	General Seats
30.	Fazal Qayum S/O Hidayat Ullah Shah Khattak	Charsadda/2	General Seats
31.	Muhammad Usman Ali S/O Fayyaz ur Rehman	Peshawar/2	Disable Quota
32.	Minhaj Khan S/O Nasrullah Khan	Mardan/2	General Seats
33.	Nigar Ahmad S/O Nazir Muhammad	Mardan/2	General Seats
34.	Huma Farid D/O Farid Ullah Khan	Charsadda/2	Female Quota
35.	Kamran Aamir S/OM. Ismail Khan	Bannu/4	General Seats
36.	Beenish Gul D/O Muhammad Sakhi	Peshawar/2	General Seats
37.	Asad Anwar Khan S/O Muhammad Anwar Khan	Lakki Marwat/4	General Seats
38.	Daulat Khan S/O Gul Meer	Charsadda/2	General Seats
39.	Imran Ali S/O Liaqat Ali	Mardan/2	General Seats
40.	Taimur Khan S/O Noor Muhammad	Mardan/2	General Seats
41.	Sana Ajmal D/O Ajmal Khan	Swabi/2	General Seats
42.	Islah Ud Din S/O Zaki Ud din	Dir (L)/3	General Seats
43.	Asad Ullah S/O Khurshid Kamal	Swat/3	General Seats
44.	Sardar Ali S/O Haji Pakar Khan	Peshawar/2	General Seats
45.	Hassan Khan S/O Talib Khan	Moh: Agy/1	General Seats
46.	Amjad Ali S/O Muhammad Hamayun Khan	Battagram/3	General Seats
47.	Israr Ahmad S/O Abdul Ghaffar	Bannu/4	General Seats
48.	Shehryar Khan S/O Ayub Khan	F.R Peshawar/1	General Seats
49.	Muhammad Sohail Khan S/O Hamid Ullah Khan	D. I Khan	General Seats
50.	Nosherwan Khan S/O Ayub Khan	Peshawar/2	General Seats
51.	Hayat Khan S/O Yousaf Khan	Peshawar/2	General Seats
52.	Tanseer Ali Mehdi S/O Altaf Hussain	D.I Khan	General Seats
53.	Junaid Alam S/O Khan Ghalib	Mardan/2	General Seats
54.	Manzoor Khan S/O Waris Khan	Moh: Agy/1	General Seats
55.	Amjad Ali S/O Khurshed Gul	Charsadda/2	General Seats
56.	Syed Abdul Mujeeb S/O Syed Tilawat Shah	Charsadda/2	General Seats
57.	Shakir Ullah Khan S/O Alif Khan	MKD AGY/3	General Seats
58.	Arbab Muhammad Ahtisham S/O Arbab Muhammad Jahanzeb	Peshawar/2	General Seats
59.	Farman S/O Raz Wali Khan	Moh: Agy/1	General Seats
60.	Javed Yousaf S/O Muhammad Yousaf	Haripur/5	General Seats
61.	Imran Hussain S/O Zafar Hussain	Peshawar/2	General Seats
62.	Abdul Haleem Khan S/O Abdur Razaq Khan	Chitral/3	General Seats
63.	Khalid Hussain S/O Muhammad Hussain	Mardan/2	General Seats

(Cont: P/3.....)

total marks 62

total marks 60 +

Attested
Law officer
KPPSC

64.	Mudasser Hussain S/O Muhammad Rashid	D.I KHAN/4	General Seats
65.	Muhammad Arif S/O Arsala Khan	Moh: Agy/1	General Seats
66.	Muhammad Usman Ali S/O Malik Muhammad Pervaiz	Abbottabad/5	General Seats
67.	Naid Wali S/O Haji Akbar Khan	FR Kohat/1	General Seats
68.	Muhammad Shahab Alam Shah S/O Zahir Shah	D.I Khan/4	General Seats
69.	Inam Ullah S/O Gul Nawaz Khan	L. Marwat/4	General Seats
70.	Saba Jabeen D/O Muhammad Israr Khan	Dir/3	Female Quota
71.	Hidayat Ullah S/O Abdul Karim	Dir (L)/3	General Seats
72.	Shoaib Ali Khan S/O Shoukat Ali Khan	Bannu/4	General Seats
73.	Ashraf Ali S/O Muhammad Ajmal Khan	Shangla/3	General Seats
74.	Fozia Durrani D/O Iftikhar Hussain	Peshawar/2	Female Quota
75.	Muhammad Imran S/O Taj Muhammad	M. Agy/1	General Seats
76.	Imran Khan S/O Wilayat Khan	Haripur/5	General Seats
77.	Haider Ali S/O Hazrat ur Rehman	Mardan/2	Disable Quota
78.	Huma D/O Danial Murad	Peshawar/2	Minority Quota
79.	Muhammad Javed S/O Abdul Sattar	M. Agy/1	General Seats
80.	Jauhar Ali S/O Habib Ullah	M. Agy/1	General Seats
81.	Syeda Alvina Shah D/O Syed Azhar Ali Shah Bukhari	Peshawar/2	Female Quota
82.	Muhammad Bilal Khan S/O Gul Sarwar Jan	F.R Bannu/1	General Seats
83.	Sumaira D/O Muhizullah	Mardan/2	Female Quota
84.	Bushra Ashraf D/O Muhammad Ashraf	Abbottabad/5	General Seats
85.	Lubna Shahzadi D/O Aurang Zeb	Abbottabad/5	General Seats
86.	Haras Khan S/O Khalid Khan	Mansehra/5	General Seats
87.	Bushra D/O Aurangzeb	Mansehra/5	General Seats
88.	Rabail Afsar D/O Khan Afsar	Abbottabad/5	General Seats
89.	Suneela D/O James Masih	Swabi/2	Minority Quota

(GHULAM DASTAGIR AHMAD)
Director Recruitment

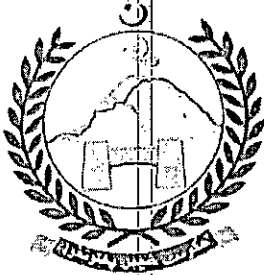
Attested
Law Officer
KPPSC

(B)

Annex D

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For official use



GOVERNMENT OF KHYBER PAKHTUNKHWA

**THE KHYBER PAKHTUNKHWA CIVIL SERVANTS
(APPOINTMENT, PROMOTION AND TRANSFER)
RULES, 1989**

Compiled by:

O&M SECTION, REGULATION WING
ESTABLISHMENT & ADMINISTRATION DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA

Attested
ND
Law Officer
KPPSC

SENIORITY

17. **Seniority :-** (1) the seniority inter se of civil servants ⁴⁷(appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission ⁴⁸[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Explanation-I:- If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

Explanation-II:- If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

Explanation-III:- A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

⁴⁹(3) In the event of merger/restructuring of the Departments, Attached Departments or Subordinate Offices, the inter se seniority of civil servants affected by the merger/restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

⁵⁰(4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the

⁴⁷ Substituted for the words appointment to a post in the same basic pay scale in a cadre by Notification No. SOR-I(S&GAD)4-1/80, dated 17-05-1989.

⁴⁸ The words inserted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 04-02-1996.

⁴⁹ Sub-rule (3) of Rule 17 added vide Notification No. SOR-I(E&AD)4-1/80/IV, dated 28-5-2002.

⁵⁰ Sub-rule (4) of Rule 17 added vide Notification No. SOR-VI (E&AD) 1-3/2008 dated 19-11- 2009.

Attested
 M
 Law Officer
 KPRSC



KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
2-FORT ROAD, PESHAWAR CANTT
(NEAR GOVERNOR HOUSE)

AUTHORIZATION

Mr. Mehtab Gul (CNIC No: 17301-1972107-9), Law Officer-II (BS-17), Khyber Pakhtunkhwa Public Service Commission, Government of Khyber Pakhtunkhwa is hereby authorized to do all the acts pertaining to litigation including appearance, vetting, submission and signing of Power of Attorneys, Affidavits, Reports, Para-wise Comments and Appeals etc. on behalf of the Khyber Pakhtunkhwa Public Service Commission before all the Courts of Pakistan, particularly the CPLA/Appeals against the orders of the High Court.

ATTESTED BY

**Deputy Director
Public Service Commission
K.P.K Peshawar**

**Secretary
Khyber Pakhtunkhwa
Public Service Commission**