

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA  
PESHAWAR

COC/petition No. \_\_\_\_\_/2017

In

Service App. No: 1387/2015

Execution Petition No. 222/17  
Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1009

Dated 29/11/2017

Shafiq Ur Rahman s/o Abdul Baqi,  
Ex-Executive District Officer,  
Agriculture Extension Department,  
District Swat.

.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary, Peshawar.
2. Secretary, Agriculture Livestock & Cooperative Department,  
Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Finance Department,  
Khyber Pakhtunkhwa, Peshawar.
4. Secretary, Establishment Department,  
Khyber Pakhtunkhwa, Peshawar.
5. Director General, Agriculture Extension Department,  
Khyber Pakhtunkhwa, Peshawar.
6. Accountant General, Khyber Pakhtunkhwa, Peshawar. .... Respondents

=====

IMPLIMENTATION / CONTEMPT OF COURT PETITION OF DECISION  
DATED 11-07-2017

=====

Respectfully Sheweth

1. The petitioner had filed a service appeal 1387 / 2015 before this Hon'ble Tribunal, with the request detailed as under;
  - (a) Directing the respondent department to consider / grant anti date promotion to the appellant from BPS-18 to BPS-19 w.e.f 15/10/2010 instead of 12/01/2012, as allowed to his junior colleague Mr. Fazli Rabbani who was granted promotion with retrospective effect from 15-10-2010 vide order dated 25-08-2015, in view of the judgment of Supreme Court of Pakistan in CP NO. 584-P/2013 and judgment of Khyber Pakhtunkhwa Service Tribunal in Execution Petition No. 47/2013 in Appeal No. 386/2013
  - (b) Directing the respondent department to extend the benefit of promotion to BPS-19 to the appellant w.e.f 15-10-2010, in view of the dictum laid down in 1996 SCMR 1185.

E.P No. 222/2017,

*Shafiq ur Rahman vs Govt*

03.09.2019

Nemo for appellant. M/S Jalal-ud-Din, Agronomist and Ajmal Khan, Section Officer alongwith Mr. Usman Ghani, District Attorney for the respondents present.

Representatives of the respondents states that the meeting of P.S.B was proposed on 29.08.2019 which was subsequently postponed and next date for the purpose has not been decided as yet. Adjourned to 18.10.2019 in order to avail the outcome of P.S.B meeting.

Representatives of the respondents had produced copies of working paper for antedate promotion of the petitioner. In this view of matter, the order dated 22.04.2019 requiring attachment of salary of respondent No. 2 is recalled. Salary of respondent No. 2, if attached, shall be released forthwith.

18.10.2019

CHAIRMAN  
Counsel for the petitioner and Addl. AG alongwith Jalalud Din, Agronomist for the respondents present.

The representative of respondents has produced copy of notification dated 15.10.2019 whereby the promotion of petitioner has been ante-dated to BPS-19 w.e.f. 15.10.2010. Placed on record.

Learned counsel for petitioner request for consigning of the implementation proceedings in view of notification produced by the respondents.

Order accordingly.

  
Chairman

E.P No. 222/2017,

*Shafiq ur Rahman vs Govt*

03.09.2019

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The representative of respondents has produced copy of notification dated 15.10.2019 whereby the promotion of petitioner has been ante-dated to BPS-19 w.e.f. 15.10.2010. Placed on record.

Learned counsel for petitioner request for consigning of the implementation proceedings in view of notification produced by the respondents.

Order accordingly.

CHAIRMAN

  
  
Chairman

12.06.2019

Syed Noman Ali Bukhari, Advocate present on behalf of counsel for the petitioner and seeks adjournment as counsel for the petitioner was not available today. Addl: AG for respondents present. Adjourned. Case to come up for further proceedings on 10.07.2019 before S.B.

  
(Ahmad Hassan)  
Member

10.07.2019

Counsel for the petitioner and Addl: AG alongwith Mr. Jalal Ud Din, Agronomist for respondents present.

The representative of the respondents has submitted a copy of letter dated 24.06.2019, whereby working paper for PSB has been sent to the S.O (PSB) Establishment Department, Government of Khyber Pakhtunkhwa. It is verbally stated that no date has yet been fixed for meeting of PSB and in the normal course such meeting is held once in three months.

In order to avail the outcome of proposed meeting of PSB, the instant matter is adjourned to 03.09.2019 before S.B.

  
Chairman

20.03.2019

Nemo for the petitioner. Mr. Kabirullah Khattak learned Addl; AG alongwith Mr. Norman Litigation Member for the respondents present. Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 22.04.2019 before S.B.

  
(Hussain Shah)  
Member

22.04.2019

Counsel for the petitioner, Addl: AG alongwith Mr. Muhammad Noman, Litigation Member and Zakiullah, Senior Auditor for respondents present.

Judgment announced by this Tribunal on 11.07.2017 is yet to be implemented. Delaying tactics are being used by the respondents to prolong the issue unnecessarily. In these circumstances, the Tribunal is left with no other option but to adopt coercive measures against the respondents. In the first instance salary of respondent no.2 (Secretary Agriculture Livestock and Cooperative Department, Khyber Pakhtunkhwa, Peshawar) is attached forthwith. In case implementation report is not submitted on the next date of hearing, further coercive measures in the shape of civil imprisonment would be taken against them. Case to come up for further proceedings on 12.06.2019 before S.B.

  
(Ahmad Hassan)  
Member

27.09.2018

Clerk of counsel for the petitioner present. Mr. Kabirullah Khattak, Addl. AG for the respondents present. Learned AAG made a request for adjournment. Granted. To come up for implementation report on 12.11.2018 before the S.B.

  
Chairman

12-11-2018

*Due to retirement of Honorable Chairman the Tribunal is non functional therefore the case is adjourned to come up for the same on 31-12-2018*

  
Referee

31.12.2018

Counsel for the petitioner present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Jalal-ud-Din, Agronomist for the respondents present. Implementation report not submitted. Learned Additional AG requested for further adjournment. Adjourned. To come up for implementation report on 11.02.2019 before S.B.

  
Muhammad Amin Khan Kundi  
Member

11.02.2019

Learned counsel for the petitioner present. Muhammad Noman litigation Assistant representative of the respondent department present and submitted copy of application in CPLA No.466-P/2017 for fixation of early date of hearing and transfer of CPLA from Registry Branch Peshawar to Principal Seat Islamabad and seeks adjournment. Adjourn. To come up for implementation report otherwise parawise comments on 20.03.2019 before S.B.

  
Member

E.P No. 222/2017

04.07.2018

Counsel for the petitioner and Mr. Sardar Shoukat Hayat, Additional AG for the respondents present. Implementation report not submitted. Requested for further adjournment. Adjourned. To come up for implementation report on 30.07.2018 before S.B.

  
(Muhammad Amin-Khan Kundi)  
Member


30.07.2018

Mr. Zafar Khan Tahir Kheli, Advocate counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Implementation report not submitted. Respondent no.2 is directed to submit implementation report through a responsible officer on 27.08.2018 before S.B.

  
Chairman

27.08.2018


Counsel for the petitioner present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Implementation report not submitted. Learned Additional AG seeks further adjournment. Last opportunity is granted. Respondent No. 2 is directed to submit implementation report through a responsible officer on 27.09.2018 before S.B.

  
(Muhammad Amin Khan Kundi)  
Member

E.P. No 222/2017

30.01.2018

Counsel for the petitioner and Mr. Usman Ghani, District Attorney alongwith Mr. Jalal ud Din, SS for respondents present. Implementation report not submitted. Requested for adjournment. Adjourned. To come up for implementation report on 22.03.2018 before S.B.

  
(Ahmad Hassan)  
Member(E)

22.03.2018

None present on behalf of the petitioner. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Jalal-ud-Din, Economist and Mr. Zakiullah, Senior Auditor for the respondents present. Notice be issued to petitioner and his counsel for attendance for 29.05.2018 before S.B.

  
(Muhammad Amin Khan Kundi)  
Member




29.05.2018

Petitioner absent. Counsel present on behalf of petitioner. Mr. Kabir Ullah Khattak, learned Additional Advocate General Jalal-ud-Din, Economist for the respondents present. Representative of the respondents department seeks time for implementation report. Adjourned. To come up for implementation report on 04.07.2018 before S.B

  
Member



Execution Petition No. 222 /2017

S.No.	Date of order Proceedings	Order or other proceedings with signature of Judge
1	2	3
1	29.11.2017	<p>The Execution Petition of Mr. Shafiq-ur-Rehman submitted to-day by Mr. M. Zaffar Tahirkheli Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;">                       REGISTRAR 29/11/17                 </p>
2	30/11/17.	<p>This Execution Petition be put up before S. Bench on <u>18/12/17.</u></p> <p style="text-align: right;">                       CHAIRMAN                 </p> <p>18.12.2017</p> <p>Notice of the present Execution Petition be issued to the respondent department. To come up for reply as well as implementation report on <u>30.01.2018</u> before S.B</p> <p style="text-align: center;">                       (Muhammad Hamid Mughal)                      MEMBER                 </p>

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA  
PESHAWAR

COC/petition No. \_\_\_\_\_/2017

In

Service App. No: 1387/2015

Execution petition No. 222/17

Shafiqu Ur Rahman

Versus

Govt. of KP etc

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Peshawar, Dated  
28<sup>th</sup> November, 2017

(MUHAMMAD ZAFAR TAHIRKHELI)  
Advocate

(Ansar Ullah Khan)  
Advocate

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA  
PESHAWAR

COC/petition No. \_\_\_\_\_/2017

In  
Service App. No: 1387/2015

*Execution Petition No. 222/17*

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1009

Dated 29/11/2017

Shafiq Ur Rahman s/o Abdul Baqi,  
Ex-Executive District Officer,  
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.....Appellant

**Versus**

1. Government of Khyber Pakhtunkhwa through  
Chief Secretary, Peshawar.
2. Secretary, Agriculture Livestock & Cooperative Department,  
Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Finance Department,  
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4. Secretary, Establishment Department,  
Khyber Pakhtunkhwa, Peshawar.
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6. Accountant General, Khyber Pakhtunkhwa, Peshawar. .... Respondents

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**IMPLIMENTATION / CONTEMPT OF COURT PETITION OF DECISION  
DATED 11-07-2017**

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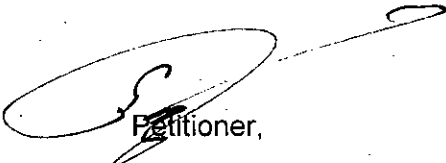
**Respectfully Sheweth:**

1. The petitioner had filed a service appeal 1387 / 2015 before this Hon'ble Tribunal, with the request detailed as under;
  - (a) Directing the respondent department to consider / grant anti date promotion to the appellant from BPS-18 to BPS-19 w.e.f 15/10/2010 instead of 12/01/2012, as allowed to his junior colleague Mr. Fazli Rabbi, who was granted promotion with retrospective effect from 15-10-2010 vide order dated 25-08-2015, in view of the judgment of Supreme Court of Pakistan in CP NO. 584-P/2013 and judgment of Khyber Pakhtunkhwa Service Tribunal in Execution Petition No. 47/2013 in Appeal No. 386/2012.
  - (b) Directing the respondent department to extend the benefit of promotion to BPS-19 to the appellant w.e.f 15-10-2010, in view of the dictum laid down in 1996 SCMR 1185.

(c) Further directing the respondent department to amend / modify the appellant's promotion order dated 12-01-2012, whereby he was promoted from BPS-18 to BPS-19, from immediate effect, and allow / consider him for promotion w.e.f 15-10-2010.

2. That the Hon'ble Tribunal accepted the appeal vide judgment & order dated 11-07-2017. The petitioner submitted an application to the department dated 20-07-2017 for implementation of the decision, but in vain. **(copies annexed)**
3. That the respondents have so far failed to implement the decision of the Hon'ble Tribunal, in spite of laps of almost four months.
4. That the respondents are willfully denying the legitimate right to the petitioner as allowed by Hon'ble Khyber Pakhtunkhwa, Service Tribunal vide judgment and order dated 11-07-2017, which needs immediate intervention of this Hon'ble Court by initiating contempt of court /implementation proceedings.
5. The matter is within the jurisdiction of this Hon'ble Tribunal.

It is, therefore, most humbly requested that by accepting this petition the Respondents may be directed to implement the decision of this Hon'ble Tribunal dated 11-07-2017, in case of failure proper contempt of court proceedings may kindly be imitated against them.

  
Petitioner,

Through,

Peshawar, dated  
24<sup>th</sup> November, 2017

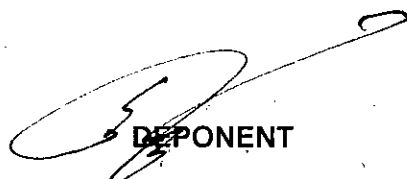
(MUHAMMAD ZAFAR TAHIRKHELI)  
Advocate

(Ansar Ullah Khan)  
Advocate

### Affidavit

I, the petitioner, stated on Oath that contents of the above petition are true and correct to the best of my knowledge and belief, and nothing has been kept concealed from this Hon'ble Tribunal.



  
DEPONENT

Appeal No. 1387/2015

Date of Institution ..... 14.12.2015  
Date of Decision ..... 11.07.2017



Shafiqur Rahman Ex-Executive-District Officer  
Agriculture Extension Department, District Svat

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary,  
Peshawar and others. ....  
(Respondents)

MR. MUHAMMAD ZAFAR TAHIRKHEL, Advocate

For appellant.

MR. MUHAMMAD JAN, Deputy District Attorney.

For respondents.

MR. NIAZ MUHAMMAD KHAN, CHAIRMAN

MEMBER

JUDGMENT

counsel for the parties heard and record perused.

NIAZ MUHAMMAD KHAN, CHAIRMAN.

Arguments of the learned

FACTS

2. The brief facts of this appeal are that the appellant was promoted to BPS-19 in the year 2012 but he was entitled for promotion from the date when the post fell vacant (15.10.2010). The departmental appeal was filed on 08.09.2015 and when the said appeal was not decided within the statutory period the present appeal filed on 14.12.2015. The departmental appeal was decided during pendency of the present appeal on 03.02.2016, rejecting the departmental appeal of the appellant.

**ATTESTED**  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

ARGUMENTS.

3. The learned counsel for the appellant argued that another colleague of the

appellant namely Fazle Rabi was given antedated promotion from 15.10.2010 and on the basis of rule of consistency involving similar point of law the appellant is also entitled for the same treatment. The learned counsel for the appellant in this respect relied upon a judgment entitled "Iameed Akhtar Niazi Versus the Secretary, Establishment Division, Government of Pakistan and others" reported as 1996-

SCMR-1185.

4. On the other hand the learned Deputy District Attorney argued that the

appellant was promoted in the year, 2012 but he preferred the departmental appeal

in the year, 2015 which is clearly time barred. That no application for condonation

of delay was preferred by the appellant to his departmental authority. That when the

departmental appeal is time barred then the present appeal is also time barred. He

also relied upon 2 judgments entitled "Abdul Hameed Vs. Ministry of Housing and

Works, Government of Pakistan Islamabad through Secretary and others" reported

as PLD 2008-Supreme Court-395 and "Dilawar Ali and another Vs. General

Manager Pakistan Railways, Lahore and others" reported as 2006-PLC(C.S) 1034

has already retired from service.

CONCLUSION

5. After hearing the arguments of both the learned counsel for the parties and

perusing the record this Tribunal reaches the conclusion that Mr. Fazle Rabi who

was junior to the appellant and both were promoted on the same date, was given

antedated-promotion on the basis of a judgment dated 31.12.2012 of this Tribunal in

service appeal No. 386/2012. In view of the judgments relied upon by the learned

counsel for the appellant and fair play the present

appellant should have been treated at par with said Fazle Rabi, though he was not a

ATTESTED  
EXAMINER  
Kyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

party to the earlier judicial proceedings. So far as the limitation is concerned it was the stance of the learned counsel for the appellant that limitation arose from the date of notification of Mr. Fazle Rabi dated 25.08.2015. This Tribunal is inclined to agree with the learned counsel for the appellant because the appellant has approached this Tribunal on the basis of treatment meted out to said Fazle Rabi though he was junior to the present appellant. This Tribunal therefore holds that the departmental appeal was well within time. The objection of the learned Deputy District Attorney regarding the retrospectivity of promotion after retirement as laid down in the quoted judgments of the august Supreme Court, this Tribunal is of the view that the present appellant seeks his antedated promotion on the basis of a judgment already delivered in Fazle Rabi case. Secondly the judgment pressed into service by the learned DDA covered antedated promotion but in the present case the appellant was already promoted. The appellant seeks that his promotion should have been from the date when the seat fell vacant. Therefore the facts of that reported cases are distinguishable from the facts of the present case.

6. As a result of the above discussion this Tribunal reaches the conclusion that the appellant is entitled for the relief as prayed for. The appeal is therefore, accepted. Parties are left to bear their own costs. File be consigned to the record room.

*Sd/- Niaz Muhammad Khan,*  
Members

*Sd/- Gul Zeb Khan,*  
Members

ANNOUNCED  
11.07.2017

Certified to be true copy

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 19-7-17  
Number of Words 1200  
Copying Fee 8-0  
Urgent 2-0  
Total 10-0  
Name of Copyist [Signature]  
Date of Completion of Copy 19-7-17  
Date of Delivery of Copy 19-7-17



6

To

The chief Secretary,  
Agriculture,  
Khyber Pakhtunkhwa,  
Peshawar.

Through: Proper Channel.

**Subject:** Implementation of judgement order of Honourable K.P service Tribunal date: 11/07/2017  
in appeal No 1387/15.

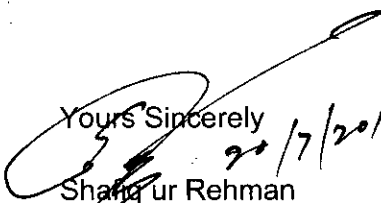
Respected Sir

1. That the appellant had filed a service appeal before K.P service tribunal for the grant of promotion with retrospective effect from 15/10/2010.
2. That the appeal no 1387/15 has been accepted by the honourable tribunal vide judgment dated 11/07/2017 and the applicant has been allowed for promotion in BPS-19 w.e.f 15/10/2010 (copy enclosed)

It is therefore requested that by implementing the decision dated 11/07/2017. The appellant may kindly be allowed the benefit in financial term w.e.f 15/10/2010 in BPS 19.

I will extremely grateful for this act of kindness, thanks

Yours Sincerely

  
Shahid ur Rehman  
Ex- Executive District Officer,  
Agriculture Extension Department,  
District Swat.

**TRUE COPY**



# VAKALATNAMA

In the Court of

**Khyber Pakhtunkhwa Service Tribunal, Peshawar**

Service Appeal No. \_\_\_\_\_ of 2017

Petitioner  
Plaintiff  
Applicant  
Appellant  
Complainant

**Shafiq ur Rahman**

Decree-Holder

**V**ERSUS

Respondent  
Defendant  
Opponent  
Accused

**Govt. of KP etc**

Judgment-Debtor

I / We Shafiq ur Rahman the above noted Appellant/Petitioner do hereby appointed and constitute, **Muhammad Zafar Tahirkeel & Ansar Ullah Khan Advocates High Court**, to appear, plead, act, compromise, withdraw or refer to arbitration for me / us as my / our counsels / advocates in the above noted matter, without any liability for his default and with the authority to engage any other Advocate / Counsel at my / our cost.

The Client / Litigant will ensure his presence before the Court on each and every date of hearing and the counsel would not be responsible if the case is proceeded ex-parte or is dismissed in default of appearance. All cost awarded in favour shall be the right of Counsel or his nominee, and if awarded against shall be payable by me/us.

I / We authorize the said Advocates to withdraw and receive on my / our behalf all sums and amounts payable or deposited on my / our account in the above noted matter.

  
Client

**M. Zafar Tahir**

Attested & Accepted (Advocates)

Dated 28/11/2017

Office **ATIQ LAW ASSOCIATES,**  
87, Al-Falah Street, Besides State Life Building,  
Peshawar Cantt, Phone: 091-5279529  
E-mail : [zafark.advocate@gmail.com](mailto:zafark.advocate@gmail.com)

**Ansar Ullah**

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 882 /ST

Dated 30-4- / 2019


To

The Accountant General,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

SUBJECT: - ORDER IN EXECUTION PETITION NO. 222/2017, MR. SHAFIQ UR RAHMAN.

I am directed to forward herewith a certified copy of order dated 22.04.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

*Defn copy*

IN THE SUPREME COURT OF PAKISTAN  
Appellate Jurisdiction

CMA. NO. \_\_\_\_\_/2019

IN

CPLA NO.466 -P/2017

Government of Khyber Pakhtunkhwa, through  
Chief Secretary Peshawar and others

-----PETITIONERS

VERSUS

Shafiq ur Rahman-----RESPONDENT

APPLICATION FOR EARLY HEARING AND  
TRANSFER OF CPLA No.466-P/2017 FROM  
REGISTRY BRANCH OF PESHAWR TO  
PRINCIPAL SEAT AT ISLAMABAD.

RESPECTFULLY SEWETH:

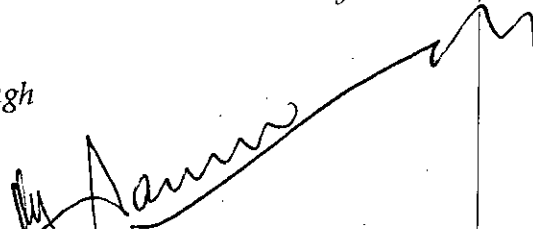
1. *That the petitioners have filed the above noted CPLA along-with stay application in the Registry Branch at Peshawar of this august Court.*
2. *That no date has yet been fixed in the case for hearing due to non-availability of the bench at the Registry Branch at Peshawar.*
3. *That the respondent has initiated implementation proceeding before the learned Khyber Pakhtunkhwa Service Tribunal Peshawar wherein notice has been issued to the petitioners for implementation and compliance report for 11-02-2019 (Copy of the order is attached).*

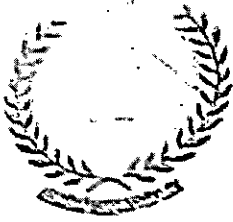
4. *That the learned Khyber Pakhtunkhwa Service Tribunal Peshawar is stressing for implementation of the impugned order in the CPLA mentioned above which is pending before this august Court at branch Registry at Peshawar.*
5. *That if the above mentioned CPLA is not fixed earlier for hearing the very purpose of the CPLA would be lost and the petitioners will face the execution proceeding of the Service Tribunal Peshawar.*
6. *That the facts and circumstances explain above an early date of hearing and transfer of case from Registry Branch at Peshawar to the Principal seat at Islamabad may please be order to save the petitioners from inconvenience.*
7. *That it is in the interest of justice and fair play if this august Court is pleased to fix the above mention CPLA as convenient to this August Court for hearing at Islamabad.*

*It is, therefore, humbly prayed that the above mentioned CPLA along-with stay application may kindly be transfer from Peshawar Registry Branch to Principal seat at Islamabad for early hearing as convenient to this August Court.*

Drawn & Filed by

Through

  
Mian Saadullah Jandoli  
Advocate on Record  
Supreme Court of Pakistan  
For Government/Petitioners



GOVERNMENT OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK & COOPERATIVE  
DEPARTMENT

Dated Peshawar, the 15<sup>th</sup> October, 2019

NOTIFICATION.

NO. SOE (AD) V-7/2019/EW: -

In pursuance of Service Tribunal Judgment of dated 11.07.2017 and recommendations of the Provincial Selection Board (PSB) meeting held on 23.09.2019, the Competent Authority is pleased to order antedated promotion of Mr. Shafiq-Ul-Rahman the then EDO Agriculture Swat to BPS-19 w.e.f 15.10.2010.

SD/-

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
AGRICULTURE, LIVESTOCK AND COOP. DEPT.

1. Dist. of even No. & Date.

Copy forwarded for information and necessary action to the: -

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, Agriculture Extension Department, Khyber Pakhtunkhwa Peshawar.
3. The District Accounts Officer, Swat.
4. PS to Minister for Agriculture, Khyber Pakhtunkhwa.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Secretary Establishment, Khyber Pakhtunkhwa, Peshawar.
7. PS to Secretary Agriculture, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Personal file.

(SHAMS-UL-ISLAM)  
SECTION OFFICER-ESTT

15/10/19

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUN  
PESHAWAR

COC/petition No. \_\_\_\_\_/2017  
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*Execution Petition No. 222/17*

Khyb  
Serv

Diary No.

Dated 21/12/18

Shafiq Ur Rahman s/o Abdul Baqi,  
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Appellant

Versus

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6. Accountant General, Khyber Pakhtunkhwa, Peshawar. .... Respondents

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IMPLIMENTATION / CONTEMPT OF COURT PETITION OF DECISION  
DATED 11-07-2017

=====

31.12.2018

Counsel for the petitioner present. Mr. Kabirullah  
Khattak, Additional AG alongwith Mr. Jalal-ud-Din,  
Agronomist for the respondents present. Implementation  
report not submitted. Learned Additional AG requested for  
further adjournment. Adjourned. To come up for  
implementation report on 11.02.2019 before S.B.

*MK*  
Muhammad Amin Khan Kundi  
Member

Certified to be true copy

*[Signature]*  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

*[Handwritten notes and signatures]*  
Date of Decision: 31-12-18  
Number of Pages: 5  
Copy Fee: 11  
Total: 21118  
Date of Decision: 31-12-18

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1615 /ST

Dated 18-9- / 2019

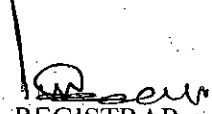
To

The Accountant General,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

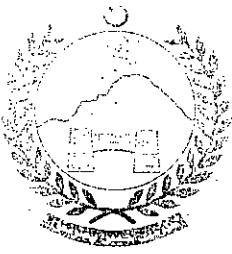
SUBJECT: - ORDER IN EXECUTION PETITION NO. 222/2017, MR. SHAFIQ UR RAHMAN.

I am directed to forward herewith a certified copy of order dated 03.09.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.





GOVERNMENT OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK & COOPERATIVE DEPARTMENT

No. SOE(AD)V-7/2019/Extension  
Date Peshawar the June 24, 2019

To

**The Section Officer (PSB),**  
Government of Khyber Pakhtunkhwa,  
Establishment Department.

**SUBJECT: - IMPLEMENTATION REPORT IN EXECUTION PETITION NO. 222/2017  
IN SERVICE APPEAL NO. 1387/2015 SHAFIQR REHMAN VS  
GOVERNMENT OF KHYBER PAKHTUNKHWA AND OTHERS.**

I am directed to refer to the subject noted above and to enclose herewith (07) seven sets of working papers alongwith the relevant documents regarding Ante-date promotion of officer from **BS-18 to BS-19** in respect of Mr. Shafiq-Ur-Rehman Ex-EDO Agriculture, Swabi duly signed by the Secretary Agriculture Department and complete in all respect for consideration and placement before the Provincial Selection Board (PSB), please.

Encl: As above.

  
(SHAMS-UL-ISLAM)  
SECTION OFFICER-ESTT:

Endst. of even No. & Date.

Copy to the:

1. the Section Officer (Litigation) Agriculture Livestock & Cooperative Department for information.
2. The Director General, Agriculture Extension Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S to Secretary Agriculture department Khyber Pakhtunkhwa, Peshawar.
4. PA to Deputy Secretary (Admn.), Agriculture Department.
5. Master file.

  
SECTION OFFICER-ESTT:

**DIRECTORATE GENERAL AGRICULTURE (EXTENSION)**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

No.11/83/Estt/\_\_\_\_\_/DG Dated Peshawar: the 11/16 /2019  
To:

The Section Officer (Estt)  
Government of Khyber Pakhtunkhwa  
Agriculture, Livestock and Cooperation  
Department, Peshawar.

Subject: **IMPLEMENTATION REPORT IN EXECUTIONS PETITION No.222/2017 IN  
SERVICE APPEAL No.1387/2015 SHAFIQR REHMAN V/S GOVERNMENT OF  
KHYBER PAKHTUNKHWA AND OTHERS**

Memo:

Kindly refer to your office letter No.SO(Lit)(AD)/3-4141/2016 dated  
30.05.2019 on the subject cited above.

Seven sets of working paper alongwith its relevant documents for ante-  
date promotion in respect of Mr. Shafiq-Ur-Rehman ex-EDO, Agriculture, Swabi for  
favour of further necessary action as desired.

Enc: seven sets.

DIRECTOR GENERAL

Endst. No. 11626-27

Copy forwarded to: -

1. The section Officer (litigations) Government of Khyber Pakhtunkhwa, Agriculture, Livestock and Cooperation Department, Peshawar for information and w/r to his office letter No. referred above.
2. The Incharge Litigation Cell HQ Office alongwith one set of Working Paper for information and necessary action.

DIRECTOR GENERAL

**WORKING PAPER FOR ANTE-DATE PROMOTION OF MR. SHAFIQ UR REHMAN  
TO BS-19 POST WITH EFFECT FROM 15-10-2010**

---

Mr. Shafiq ur Rehman (BS-18) officer of the Agriculture Extension Department was promoted to BS-19 post vide Government of Khyber Pakhtunkhwa Agriculture Livestock and Cooperative Department with effect from 12-01-2012 vide Notification No SOE(AD) V-7/2011/Ext. dated 12-01-2012, (Annexure-A).

The Ex-Officer lodged an appeal in the Khyber Pakhtunkhwa Services Tribunal Peshawar vide appeal No.1387/2015 versus Chief Secretary Government of Khyber Pakhtunkhwa and others with the prayer that the Notification dated 12-01-2012 may be modified to the extent his promotion may be ante-dated with effect from 15-10-2010 instead of with immediate effect. The Khyber Pakhtunkhwa Services Tribunal Peshawar observes that the appellant while serving in BPS-18 in the respondents department was eligible for promotion to BPS-19 post. He was considered and found fit for promotion by the Provincial Selection Board in its meeting held on 15-10-2010. Due to status quo order granted in Execution Petition No. 3/2010, he could not be promoted. On vacation of status quo order, the appellant was again considered and found fit for promotion. The appellant was entitled for promotion with effect from 15-10-2010 under the Law and in light of Judgments given in appeal No. 386/2012 filed by Mr. Fazli Rabbi v/s Govt. of Khyber Pakhtunkhwa dated 31.12.2012 (Annexure-B) but vide Notification dated 12-01-2012; he has been promoted with immediate effect. The Khyber Pakhtunkhwa Services Tribunal Peshawar accepted the above appeal that the appellant is entitled for the relief as prayed for and the respondents were directed to ante-date promotion of the appellant with effect from 15-10-2010 vide Judgment dated 11.07.2017 (Annexure-C). The Government of Khyber Pakhtunkhwa lodged an appeal in the August Supreme Court of Pakistan against the decision of Khyber Pakhtunkhwa Services Tribunal Peshawar in appeal No. 1387/2015. But the case is still under process in the August Court and no herring has been made in the above title case. The appellant filled Execution Petition No. 222/2017 in Service Appeal No. 1387/2015 for implementation of the judgment dated 11.07.2017. The honorable Tribunal directed Respondents to implement the said judgment and submit implementation report on 12.06.2019 vide Order Sheet dated 22.04.2019 (Annexure-D). The Govt. of Khyber Pakhtunkhwa directed the Advocate On Record office of the Advocate General, Khyber Pakhtunkhwa Peshawar with the request to file an early hearing application in Supreme Court of Pakistan along with applications for suspension of impugned order / judgment dated 11.07.2017 passed by Khyber Pakhtunkhwa Service Tribunal Peshawar in the subject case vide letter No. SOL/DG/Law/9-3(3)Agri./2017/6562-65 dated 30.05.2019 (Annexure-E).

The Provincial Selection Board Peshawar is requested that promotion of Mr. Shafiq Ur Rehman BS-19 (Rtd) may be ante-dated with effect from 15-10-2010 instead of 12-01-2012.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
AGRICULTURE, LIVESTOCK & COOPERATIVES,  
DEPARTMENT PESHAWAR**

GOVERNMENT OF  
KHYBER PAKHTUNKHWA Annex - A  
AGRICULTURE LIVESTOCK & COOPERATIVE  
DEPARTMENT

Dated Peshawar, the January 12, 2012

**NOTIFICATION.**

NO. SOE (AD) V-7/2011/Ext.- On the recommendations of the Provincial Selection Board (PSB), the competent authority is pleased to promote the following officers of Extension Wing of Agriculture, Livestock and Cooperative Department from BS-18 to BS-19 on regular basis with immediate effect except in case of officer at Sr. No.ii Mr. Shafiq-ur-Rehman with effect from one day before his retirement i.e. 27.12.2011 for actualization of his promotion:-

- i. Mr. Shafiq-ur-Rehman
- ii. Mr. Fazli Rabbi

2. The officers at Sr.No.ii will be on probation for a period of one year in terms of section 6(2) of the NWFP Civil Servants Act, 1973 read with rule 15 (1) NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1981.

3. On their promotion, the following postings/transfers are ordered in the best public interest:-

Sl.No.	Name of Officer	From	To
1.	Mr. Shafiq-ur-Rehman	Executive District Officer (Agriculture) (BS-19) Swat (in his own pay scale).	EDO (Agriculture) BS-19 Swat for one day before his retirement i.e 27.12.2011 for actualization of his promotion
2.	Mr. Fazli Rabbi	Director Coordination/Planning and Monitoring (BS-19) HQ (in his own pay scale)	Director Coordination/Planning and Monitoring (BS-19) HQ

Sd/-

SECRETARY AGRICULTURE

Endst. of even No. & Date.

Copy forwarded for information and necessary action to:-

1. The DG, Agriculture (Extension), Khyber Pakhtunkhwa, Peshawar.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The District Accounts Officers Swat.
4. PS to Chief Minister, Khyber Pakhtunkhwa.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Minister for Agriculture, Khyber Pakhtunkhwa.
7. PS to Secretary Agriculture, Khyber Pakhtunkhwa.
8. Personal file.

SECTION OFFICER-ESTT.

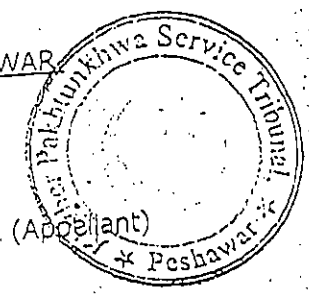
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14/1/12

Annexure - 1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 386/2012

Fazal Rabbi, Director Coordination, Directorate General Agriculture (Extention) Peshawar.



VERSUS

1. Chief Secretary, Government of Khyber Pakhtunkhwa Peshawar.
2. Secretary Agriculture, Livestock and Cooperative Department, Khyber Pakhtunkhwa, Peshawar.
3. Director General Agriculture (Extension) Khyber Pakhtunkhwa, Peshawar.
4. Secretary Establishment, Khyber Pakhtunkhwa, Peshawar. (Respondents).

S.No.	Date of Hearing	Order/other proceedings with signature of Judge/Magistrate
1	2	3
	31.12.2012	<p>Appellant with counsel, and Mr. Sherafgan Khattak alongwith Muhammad Khan, Superintendent for the respondents present. Arguments heard and record perused.</p> <p>2. This appeal has been filed by the appellant Fazal Rabbi, under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the notification dated 12.1.2012, whereby the appellant has been promoted with immediate effect instead of 15.10.2010. It has been prayed that on acceptance of the appeal, the notification dated 12.1.2012 may be modified to the extent his promotion may be ante-dated w.e.f. 15.10.2010 instead of with immediate effect.</p> <p>3. The learned counsel for the appellant argued that the appellant was appointed as Agriculture Officer in the respondent department on 29.4.1974. On 15.10.2010 the respondent department held its PSB meeting for consideration promotion cases of the appellant alongwith others. He was considered fit for promotion but due to status quo order dated 28.4.2011, granted by this Tribunal in Execution Petition No. 3/2010 in Service Appeal No. 504/2008 in favour of Faham Dil, Senior Instructor. Lateron the status quo was vacated and another PSB meeting was held on 18.10.2011 and the appellant was promoted from BPS-18 to BPS-19 with immediate effect instead of ante-dation of his promotion w.e.f. 15.10.2010. He further argued that the appellant was entitled to be promoted from the date of availability of the post under</p>

ATTESTED

EX-HONORABLE JUDGE  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

*[Handwritten signature]*

ACQUAINTANCE  
SECRETARY  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

189

the law. In support of his arguments, the learned counsel for the appellant relied on 2006-SCMR-1938 and unreported judgment dated 24.5.2012 of the august Supreme Court of Pakistan in Civil Appeals No. 860 to 861 of 2010. He stated that the appellant is also entitled to the same treatment under the law. He requested that the appeal may be accepted as prayed for.

4. The learned AAG argued that the case of appellant for promotion to BPS-19 was submitted to the Provincial Selection Board well in time but due to status quo order issued by this Tribunal in Execution Petition No. 3/2010, he could not be promoted. After vacation of status quo, he has been considered by the PSB and promoted vide notification dated 12.1.2012 with immediate effect. He requested that the appeal may be dismissed.

5. The Tribunal observes that the appellant while serving in BPS-18 in the respondent department was eligible for promotion to BPS-19. He was considered and found fit for promotion by the PSB in its meeting held on 15.10.2010. Due to status quo order granted in Execution Petition No. 3/2010, he could not be promoted. On vacation of status quo order, the appellant alongwith others, was again considered and found fit for promotion. The appellant was entitled for promotion with effect from 15.10.2010 under the law and in light of judgments as referred to above but vide notification dated 12.1.2012, he has been promoted with immediate effect. The Tribunal agrees with the arguments advanced by the learned counsel for the appellant.

6. In view of the above; the appeal is accepted and the respondents are directed to ante-date promotion of the appellant w.e.f. 15.10.2010. Parties are left to bear their own costs. File be consigned to the record.

ANNOUN:  
31.12.20:

Certified to be true copy

EA  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Sd/- Syed Mansoor Ali Shah  
Member  
Sd/- Faisal Ullah Khan  
Member  
Director Plant Protection  
Directorate General Agriculture  
(Ext), Khyber Pakhtunkhwa  
Peshawar

Number: 6-2  
Date of Presentation of Affidavit: 1-1-2013  
Total: 6-1  
No. of Pages: 6-2-2012

Appeal No. 1387/2015

Date of Institution ... 14.12.2015

Date of Decision ... 11.07.2017



Shafiqur Rahman Ex-Executive District Officer  
Agriculture Extension Department, District Swat.

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary,  
Peshawar and others. ... (Respondents)

MR. MUHAMMAD ZAFAR TAIHRKHELLI,  
Advocate

For appellant.

MR. MUHAMMAD JAN,  
Deputy District Attorney.

For respondents.

MR. NIAZ MUHAMMAD KHAN,  
MR. GUL ZEB KHAN

CHAIRMAN  
MEMBER

ATTEST  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN:- Arguments of the learned  
counsel for the parties heard and record perused.

FACTS

2. The brief facts of this appeal are that the appellant was promoted to BPS-19 in the year 2012 but he was entitled for promotion from the date when the post fell vacant (15.10.2010). The departmental appeal was filed on 08.09.2015 and when the said appeal was not decided within the statutory period the present appeal filed on 14.12.2015. The departmental appeal was decided during pendency of the present appeal on 03.02.2016, rejecting the departmental appeal of the appellant.

*Signature*  
AGRICULTURE EXTENSION DEPARTMENT  
DISTRICT SWAT  
PESHAWAR

3. The learned counsel for the appellant argued that another colleague of the

appellant namely Fazle Rabi was given antedated promotion from 15.10.2010 and on the basis of rule of consistency involving similar point of law the appellant is also entitled for the same treatment. The learned counsel for the appellant in this respect relied upon a judgment entitled "Iameed Akhtar Niaz Versus the Secretary, Establishment Division, Government of Pakistan and others" reported as 1996-SCMR-1185.

4. On the other hand the learned Deputy District Attorney argued that the

appellant was promoted in the year, 2012 but he preferred the departmental appeal in the year, 2015 which is clearly time barred. That no application for condonation of delay was preferred by the appellant to his departmental authority. That when the departmental appeal is time barred then the present appeal is also time barred. He also relied upon 2 judgments entitled "Abdul Iameed Vs. Ministry of Housing and Works, Government of Pakistan Islamabad through Secretary and others" reported as PLD 2008-Supreme Court-395 and "Dillawar Ali and another Vs. General Manager, Pakistan Railways, Lahore and others" reported as 2006-PLC(C.S) 1034 wherein it is held that no antedated promotion can be given to a civil servant.

has already retired from service.

CONCLUSION

5. After hearing the arguments of both the learned counsel for the parties with

perusing the record this Tribunal reaches the conclusion that Mr. Fazle Rabi who

was junior to the appellant and both were promoted on the same date, was given

antedated promotion on the basis of a judgment dated 31.12.2012 of this Tribunal in

service appeal No. 386/2012. In view of the judgments relied upon by the learned

counsel for the appellant and fair play the present

appellant should have been treated at par with said Fazle Rabi, though he was not a

MISSIVE

ATTESTED  
EXAMINER  
Kyber Pakhtunkhwa  
Service Tribunal,  
Peshawar



the stance of the learned counsel for the appellant that limitation arose from the date of notification of Mr. Fazle Rabi dated 25.08.2015. This Tribunal is inclined to agree with the learned counsel for the appellant because the appellant has approached this Tribunal on the basis of treatment meted out to said Fazle Rabi though he was junior to the present appellant. This Tribunal therefore holds that the departmental appeal was well within time. The objection of the learned Deputy District Attorney regarding the retrospectivity of promotion after retirement as laid down in the quoted judgments of the august Supreme Court, this Tribunal is of the view that the present appellant seeks his antedated promotion on the basis of a judgment already delivered in Fazle Rabi case. Secondly the judgment pressed into service by the learned DDA covered antedated promotion but in the present case the appellant was already promoted. The appellant seeks that his promotion should have been from the date when the seat fell vacant. Therefore the facts of that reported cases are distinguishable from the facts of the present case.

6. As a result of the above discussion this Tribunal reaches the conclusion that the appellant is entitled for the relief as prayed for. The appeal is therefore, accepted. Parties are left to bear their own costs. File be consigned to the record room.

*Sd/- Niaz Muhammad Khan,*  
*Member*

*Sd/- Gul Zeb Khan,*  
*Member*

ANNOUNCED  
11.07.2017

Certified to be true copy

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

DIRECTOR FOR EXTENSION  
AGRICULTURE (EXTENSION)  
KHYBER PAKHTUNKHWA PESHAWAR

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA  
PESHAWAR

COC/petition No. \_\_\_\_\_/2017

In  
Service App. No: 1387/2015

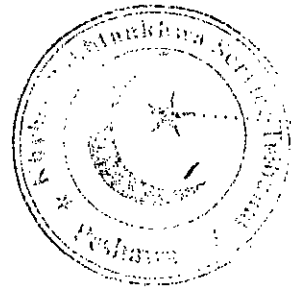
Execution Petition No. 222/17

Khyber Pakhtunkhwa  
Service Tribunal

Shafiq Ur Rahman s/o Abdul Baqi,  
Ex-Executive District Officer,  
Agriculture Extension Department,  
District Swat.

Diary No. 1009

Dated 29/11/2017



Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar.
  2. Secretary, Agriculture Livestock & Cooperative Department, Khyber Pakhtunkhwa, Peshawar.
  3. Secretary, Finance Department, Khyber Pakhtunkhwa, Peshawar.
  4. Secretary, Establishment Department, Khyber Pakhtunkhwa, Peshawar.
  5. Director-General, Agriculture Extension Department Khyber Pakhtunkhwa, Peshawar.
  6. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- ..... Respondents

=====

IMPLIMENTATION / CONTEMPT OF COURT PETITION OF DECISION  
DATED 11-07-2017

=====

Respectfully Sheweth

1. The petitioner had filed a service appeal 1387 / 2015 before this Hon'ble Tribunal, with the request detailed as under;

- (a) Directing the respondent department to consider / grant anti date promotion to the appellant from BPS-18 to BPS-19 w.e.f 15/10/2010 instead of 12/01/2012, as allowed to his junior colleague Mr. Fazli Rabbi, who was granted promotion with retrospective effect from 15-10-2010 vide order dated 25-08-2015, in view of the judgment of Supreme Court of Pakistan in CP NO. 584-P/2013 and judgment of Khyber Pakhtunkhwa Service Tribunal in Execution Petition No. 47/2013 in Appeal No. 386/2012.

Certified true copy

*[Handwritten signature]*



20.03.2019

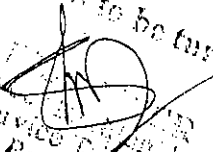
Nemo for the petitioner. Mr. Kabirullah Khattak learned Addl; AG alongwith Mr. Norman Litigation Member for the respondents present. Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 22.04.2019 before S.B.


  
(Hussain Shah)  
Member

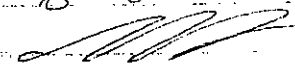
22.04.2019

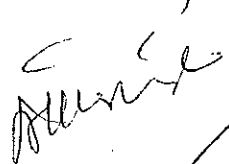

Counsel for the petitioner, Addl: AG alongwith Mr. Muhammad Noman, Litigation Member and Zakiullah, Senior Auditor for respondents present.

Judgment announced by this Tribunal on 11.07.2017 is yet to be implemented. Delaying tactics are being used by the respondents to prolong the issue unnecessarily. In these circumstances, the Tribunal is left with no other option but to adopt coercive measures against the respondents. In the first instance salary of respondent no.2 (Secretary Agriculture Livestock and Cooperative Department, Khyber Pakhtunkhwa, Peshawar) is attached forthwith. In case implementation report is not submitted on the next date of hearing, further coercive measures in the shape of civil imprisonment would be taken against them. Case to come up for further proceedings on 12.06.2019 before S.B.

Certified to be true copy  
  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

  
(Ahmad Hassan)  
Member

Date of Receipt ..... 25/4/19  
Number of Files ..... 800  
Copying Fee ..... 6.00  
Urgent ..... 2.00  
Total ..... 8.00  
Name of Officer ..... 

  
  
DIRECTOR  
AGRICULTURE AND  
LIVESTOCK  
KHYBER PAKHTUNKHWA  
PESHAWAR

Annex-E



DIRECTORATE GENERAL LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA, STREET B.2 PLOT NO. 21  
PHASE 5, HAYATABAD PESHAWAR

No.SOL/DG/Law/9-3(3)Agri/2017/ 6562-65  
Dated Peshawar the 20/5 /2019.

To

The Advocate General,  
Khyber Pakhtunkhwa, Peshawar.

Attention: Advocate on Record.

SUBJECT: CPLA TITLED GOVERNMENT OF KHYBER PAKHTUNKHWA AND  
OTHERS VS SHAFIQ UR REHMAN AND OTHERS.

Dear Sir,

I am directed to refer to Government of Khyber Pakhtunkhwa Agriculture, Livestock & Cooperative Department letter No.SO(Lit)AD/3-141/2016, dated: 15-05-2019 on the subject noted above and request you file and early hearing application in Supreme Court of Pakistan alongwith application for suspension of impugned order / judgment dated 11-07-2017 passed by the Khyber Pakhtunkhwa Service Tribunal, Peshawar in the subject case at an early date in the subject case, please.

Yours faithfully,

ASSISTANT SOLICITOR (Lit)

Endst: No & date even.

Copy forwarded to the:

1. Secretary to Government of Khyber Pakhtunkhwa Agriculture, Livestock & Cooperative Department with the request to depute well conversant Department Representative to the office of Advocate General Khyber Pakhtunkhwa alongwith complete record of the subject case doing the needful, please.
2. Director General Agriculture (Extension) Khyber Pakhtunkhwa, Peshawar.
3. PS to Secretary Law Department.

ASSISTANT SOLICITOR (Lit)

*[Handwritten signature]*  
*[Handwritten signature]*  
DIRECTOR GENERAL  
LAW & HUMAN RIGHTS  
KHYBER PAKHTUNKHWA  
PESHAWAR