


Form-A

FORM OF ORDERSHEET

Court of \_\_\_\_\_

Case No. 655/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	13.05.2024	<p>As per verbal direction of the Hon'ble Member Judicial the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 15.5.2024. Parcha Peshi given to the counsel for the appellant:</p> <p style="text-align: right;"> REGISTRAR</p>

Respected Sir,

It is submitted that the present appeal was received on 05.04.2024, which was returned to the counsel for the appellant for removing objection (Flag-A). Today i.e. 03.05.2024 the learned counsel re-filed the appeal without removing the objection no.1.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.



REGISTRAR


Hon'ble Member (J).

The appeal of Mr. Abdul Wahab received today i.e on 05.04.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Copy of impugned promotion order of respondent no.3 to 5 mentioned in the memo of appeal are not attached with the appeal be placed on it.
- 2- Copy of departmental appeal against the impugned promotion order is not attached with the appeal be placed on it.

No. 771 /S.T.

Dt. 8/4 /2024.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Fazal Shah Mohmand Adv.  
High Court Peshawar.

Respected Sir,

Resubmitted with the request that the appellant filed an application to XEN arrigation in which he prayed for the promotion orders of respondents No: 3 to 5 but no result. Copy of application is attached.

It is therefore requested that kindly the instant Service Appeal may kindly be put up to Hon'ble Court please.



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

Abdul Wahab.....**Appellant**

**V E R S U S**

Govt. of KPK and others.....**Respondents**

**APPLICATION FOR FIXATION  
ABOVE TITLED SERVICE APPEAL  
AT PRINCIPAL SEAT PESHAWAR**

**Respectfully Sheweth:-**


1. That the instant service appeal has been filed today in which no date of hearing is fixed.
2. That counsel for the appellant as well as respondents in the instant case belongs to Peshawar in this regard the counsel as well as the appellant request for fixation of the instant service appeal at Principal Seat of this Hon'ble Tribunal.

**It is, therefore, most humbly  
prayed that on acceptance of this  
application, the instant case may  
kindly be fixed at the principal seat at  
Peshawar of this Hon'ble Tribunal.**

Dated:- 5 / 4 / 2024

Applicant

Through

  
**Fazal Shah Mohmand**  
Advocate, Supreme Court of  
Pakistan

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Service Appeal No 655/2024

Abdul Wahab.....Appellant

**V E R S U S**

SE & others.....Respondents

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**Dated:-03-04-2024**

**Appellant**

**Through**

**Fazal Shah Mohmand**  
**Advocate,**  
**Supreme Court of Pakistan**

**&**

**Baseer Ahmad Shah**

**&**

**Ibad Ur Rehman Khalil**  
**Advocates, Peshawar**

**OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841**

**Email:- fazalshahmohmand@gmail.com**

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Service Appeal No. 655 /2024

Abdul Wahab S/O Sultan Mehmood, Beldar Malakand Irrigation Division,  
Malakand.....**Appellant**

**V E R S U S**

1. Superintendent Engineer, Irrigation Department, Circle Mardan.
2. Executive Engineer, Malakand Irrigation Division, Malakand.
3. Yaqoob Said S/O Rahim Said, Gauge Reader, Malakand Irrigation Division, Malakand.
4. Masaud Khan, Gauge Reader, Malaknad Irrigation Division, Malakand.
5. Muhammad Bashir S/O Jamshed, Gauge Reader, Malaknad Irrigation Division, Malakand.....**Respondents**

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE PROMOTION ORDERS OF THE RESPONDENTS NO 3 TO 5 AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT DATED 14-01-2020 HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:-**

**On acceptance of this appeal, the promotion Orders of the respondents No 3 to 5 may kindly be set aside and the appellant may kindly be ordered to be promoted as Gauge Reader (BPS-05) from 25-04-2019, i.e the date his juniors were promoted with all back benefits.**

**Respectfully Submitted:-**

1. That the appellant is highly qualified, has passed his Inter mediate and was initially appointed as Chowkidar BPS-01 on 07-04-2009 and was redesignated as Beldar on 18-10-2010 and since then he performed

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his duties with honesty and full devotion and to the entire satisfaction of his high ups. **(Copies of Orders dated 07-04-2009 & 18-10-2010 are enclosed as Annexure A & B).**

2. That since appointment/re-designation as Beldar the appellant has not been promoted despite having more than 14 years of unblemished service record while he is perfectly fit and eligible and coming up to the criteria for promotion to the post of Beldar.
3. That according to the rules 50% posts of Gauge Reader are to be filled by initial recruitment while 50% posts are to be filled by promotion on the basis of seniority cum fitness from amongst the Mate, Regulation Beldar and Beldar having SSC qualification and ten years' service in the circle. **(Copy of Rules is enclosed as Annexure C).**
4. That according to the Seniority of the Beldars of Malakand Irrigation Division, Malakand the appellant is placed at Serial No 44 while his other colleagues who are placed below the appellant, i.e respondent No.3 at Serial No 53 and respondent No 4 placed at Serial No 87 have been promoted in violation of law and rules on the subject. Respondent No 5 has been promoted as Gauge Reader on 25-04-2019 while he was transferred from other Division to Malakand Irrigation Division was thus required to had been placed at the bottom of seniority was promoted as Gauge Reader vide Order dated 16-03-2020. It merits mention that the despite request, copies of promotion orders of respondents No 3 and 4 were not provided to the appellant. **(Copy of Seniority List & Order dated 25-04-2019 is enclosed as Annexure D & E).**
5. That the appellant filed departmental appeal for his promotion as Gauge Reader (BPS-05) on 14-01-2020 to respondent No 1 however the same was not been responded so far despite the lapse of more than the statutory period of ninety days where after, the appellant approached this honorable Court by filing Service Appeal No 12173/2020 and during the pendency the respondents filed their comments/reply. **(Copy of departmental appeal, Post office receipts, Service Appeal & comments are enclosed as Annexure-F, G & H).**

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6. That the stated Service Appeal No 12173/2020 came up for final arguments on 13-03-2024 and during arguments, the appellant was confronted with point that since he has not challenged the promotion orders of private respondents therefore it would be appropriate to withdraw the appeal with permission to avail proper remedy, thus the appellant requested accordingly and the Service Appeal was disposed of accordingly vide Order dated 13-03-2024. **(Copy of Order dated 13-03-2024 is enclosed as Annexure I).**
7. That the impugned promotion Orders of respondents No 6 to 8 are against the law, facts and principles of justice on grounds inter-alia as follows:-

**GROUND:-**

- A. That the impugned Orders are illegal, unlawful without lawful authority and void-ab-initio.
- B. That mandatory provisions of law have been violated by the respondents and the appellant has not been treated according to law and rules and more particularly rules governing the subject.
- C. That the appellant is perfectly fit and eligible and coming up to the criteria set forth in law and rules but malafidely has not been promoted.
- D. That most of the seniors to the appellant are not eligible for promotion for not having the requisite qualification, hence the appellant is required to be promoted accordingly.
- E. That even as per the rules/law the appellant is entitled having more than the required length of service besides qualification for promotion as Gauge Reader.
- F. That even juniors including respondent No 3 & 4 have been promoted in violation of the rules on the subject denying the same treatment to the appellant.
- G. That so far respondent No 5 is concerned, he too is required to have been placed junior to the appellant, as he was recently transferred to



④

Malakand Irrigation Division, thus too he is not eligible to have been promoted.

- H. That even in reply to para "G" of the comments, official respondents have admitted that some posts were filled in Baizai Irrigation Scheme through initial recruitment, but strangely no posts were allocated to the promotion quota, thus too the appellant is required to be promoted as Gauge Reader.
- I. That there is no omission or commission on part of the appellant and he could not be punished for the fault of others if any.
- J. That respondents have appointed three Gauge Readers in the Baizai Irrigation Scheme of the same division, thus too the appellant is entitled to be promoted as Gauge Reader.
- K. That the appellant has more than 15 years of service with unblemished service record.

**It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.**

**Any other relief deemed appropriate in the circumstances of the case and not specifically asked for may also be granted in favor of the appellant.**

**Dated:-03-04-2024**

**Appellant**

**Through**

**Fazal Shah Mohmand  
Advocate,  
Supreme Court of Pakistan**

**&**

**Baseer Ahmad Shah**

**&**

**Ibad Ur Rehman Khalil  
Advocates, Peshawar**

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**LIST OF BOOKS:**

1. Constitution 1973.
2. other books as per need

**CERTIFICATE:**

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

**ADVOCATE**

**AFFIDAVIT**

I, **Abdul Wahab S/O Sultan Mehmood, Beldar Malakand Irrigation Division, Malakand**, (the appellant), do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

**DEPONENT**

⑥

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Service Appeal No \_\_\_\_\_/2024

Abdul Wahab.....Appellant

**V E R S U S**

SE & others.....Respondents

**Application for the condonation of delay if any**

**Respectfully submitted:-**

1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
2. That the grounds of appeal may be considered as integral Part of this application.
3. That the appellant approached respondents for his promotion and he was time and again assured that his appeal will soon be decided due to which he visited time and again but to no avail.
4. That even juniors to the appellant have been promoted while denying such right to the appellant which is recurring cause of action and the loss is caused to the appellant every month.
3. That even otherwise law as well as the superior Courts dictas favors decision of cases on merit instead of technicalities.

**It is therefore prayed, that on acceptance of this application, the delay if any in filing of instant appeal may kindly be condoned.**

**Dated:-03-04-2024**

**Through**

**Appellant**

**Fazal Shah Mohmand  
Advocate,  
Supreme Court of Pakistan**

**&**

**Baseer Ahmad Shah**

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&

**Ibad Ur Rehman Khalil  
Advocates, Peshawar**

**AFFIDAVIT**

I, Abdul Wahab S/O Sultan Mehmood, Beldar Malakand Irrigation Division, Malakand, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

**DEPONENT**

-8- (8) "A"

**OFFICE OF THE EXECUTIVE ENGINEER MALAKAND IRRIGATION DIVISION, MALAKAND.**

No. 811 / 7-E(5)

Dated Malakand, the 7/04/2009

To

Mr. Abdul Wahab S/O Sultan Mahmood, ✓  
R/O Jewar Banda Tehsil Takht Bai,  
District Mardan.

**Subject:- APPOINTMENT AS CHOWKIDAR BS-01.**


Consequent upon the recommendation of the Departmental Selection Committee meeting held on 02/04/2009, you are hereby appointed as "CHOWKIDAR"BS-01 (2970-90-5670) on temporary contract basis, at the rate of Rs.2970/- per month plus usual allowances as admissible to Civil Servant of the same status and grade with effect from the date of actual arrival for duty, in Irrigation Sub Division, Dargai subject to the following terms and conditions. The order is issued in light of the policy notified vide Government of NWFP Finance Department No. FD. (SOSR) (II) 12-1/2002. dated 20/10/2002 endorsed to this office vide Chief Engineer (O&M) Irrigation Department NWFP Peshawar No.19893-19900/IB/A/179-E (II), dated 20.08.2003.

**TERMS & CONDITIONS.**

1. You will be placed in Minimum of BPS-01 (2970-90-5670) with usual allowance as admissible to Govt. Servant of the same Pay Scale.
2. Your services will be governed under the Government of NWFP Contract Policy 2002 and concerned provincial Govt. policy notified time to time.
3. Either party can terminate the contract on 2 Months Notice or 2 Months salary in lieu thereof.
4. You will be provided same facilities under Benevolent Fund as admissible to Government Servants at the rates to be prescribed by the Government.
5. You will be entitled toward Contributed Provident Fund for which you will have to contribute at the Govt. prescribed rate.
6. You will not contribute to G.P.Fund and shall not be entitled for pension and gratuity benefits.


If the offer of the appointment on contract basis on the above-mentioned terms and conditions is acceptable to you, then you should report your self for duty to the undersigned with the production of the following documents.

- i. Domicile Certificate.
- ii. Medical Fitness Certificate from the concerned Medical Superintendent of District Head Quarter Hospital.
- iii. A Certificate to the effect that you are not dismissed Government servant.
- vi. You are required to produce an undertaking on Stamp Paper worth Rs.30/- duly attested by the Oath Commissioner stating therein the acceptance of all the above noted Terms & Conditions.

  
Executive Engineer  
(Phone #.410492)

Copy to the:-

1. Agency Comptroller of Accounts, Malakand Agency for information and necessary action, please.
2. Sub Divisional Officer, Irrigation Sub Division, Dargai.
3. Divisional Accounts Officer (Local) for information and necessary action.
4. Head Clerk (Local)
5. Service Book.

  
Executive Engineer  
(Phone #.410492)

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11 F (Sub)

Dated Malakand the 18 / 10 / 2010.

OFFICE ORDER

Mr. Abdul Wahab Chowkidar of Katling Section attached to Dargai Irrigation Sub Division Dargai is hereby re-designated as Balder against the vacant post on his own request in the same pay and scale with immediate effect.

Executive Engineer,  
Malakand Irrigation Division,  
Malakand

Copy forwarded for information to the :

1. Sub Di Officer, Dargai Irrigation Sub Division Dargai
2. Agency A Officer Malakand
3. Divisional Account Officer / Head clerk (Local)

Executive Engineer,  
Malakand irrigation Division,  
Malakand

PROFORMA SHOWING PROPOSED METHODS OF RECRUITMENT FOR THE VARIOUS POSTS IN IRRIGATION DEPARTMENT N.Y.P.

Sl. No.	Name of Post with BS	Minimum qualification for appointment by initial Recruitment or by transfer	Age Limit	Method of recruitment
55	Surveyor BS-6	SSC with one year certificate of survey from a recognized Institute	18-30 years	By initial recruitment
56	Security Sergeant BS-6	Retired Armed / Civil / Armed forces personnel or other rank of Police with SSC	upto 45 years	1. 50% by initial recruitment 2. 50% by promotion on the basis of seniority cum fitness from amongst the Security Guards/Barkandaz in the Division
57	Security Guard BS-1	Ex-service man	18-45 years	By initial recruitment
58	Barkandaz BS-1	Ex-service man	18-45 years	By initial recruitment
59	Land Reclamation Supervisor BS-6	SSC with Dalwar Course	18-60 years	By initial recruitment
60	Gauge Reader BS-5	SSC or equivalent Qualification from a recognized Institute or Board	18-30 years	1. 50% by initial recruitment 2. 50% by promotion on the basis of seniority cum fitness from amongst the Mate Regulation Beldar and Beldar having SSC qualification and ten years service in the Circle
61	Qamam Khatib BS-5	Either sanad in Urdu Sec. Nazam or a Sanad of Fazel-i-Arabi Preference a. Proficiency in Urdu b. Hafiz-Quran c. A sanad in Shahadat-e-Alama from the Jamia d. Certificate of having passed primary class examination	25-30 years	By initial recruitment
62	Telephone Attendant BS-5	SSC or equivalent qualification from a recognized Institute/Board	18-30 years	By initial recruitment
63	Painter BS-5	Three years experience certificate in the relevant field from a reputable Institue	18-30 years	By initial recruitment

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"C"

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**PROFROMA SHOWING PROPOSED METHOD OF RECRUITMENT  
FOR THE VARIOUS POSTS IN IRRIGATION DEPARTMENT NWFP**

S No.	Name of Post with BS	Minimum qualification for appointment by initial Recruitment or by transfer	Age Limit	Method of requirement
1	2	3	4	5
55	Surveyor BS-6	SSC with one year certificate of survey from a recognized Institute	18-30 years	By initial recruitment
56	Security Sergeant BS-6	Retired Armed/Civil Armed Forces as least in the rank of Hawaldar with SSC	Upto 45 years	1. 50% by initial recruitment 2. 50% by promotion on the basis of sonority cum fitness from amongst the Security/Barkandaz in the Division
57	Security Guard BS-1	Ex-service man	18-45 years	By initial recruitment
58	Barkandaz BS-1	Ex-service man	18-45 years	By initial recruitment
59	Land Reclamation Supervisor BS-6	SSC with Patwar Course	18-30 years	By initial recruitment
60	Gauge Reader BS-5	SSC or equivalent Qualification from a recognized Institute or Board	18-30 years	1. 50% by initial recruitment 2. 50% by promotion on the basis of sonority cum fitness from amongst the Mate. Regulation Beldar and Beldar having SSC qualification and ten years service in the Circle.
61	Imam Masjid BS-5	Either sanad in Dars-e-Nizami of Fazil-e-Arabi preference a. Proficiency in Qirat b. Hafiz Quran c. A sanad in Shahdat-e- Alamia from the Jamie d. Certificate of having passed primary class examination	25-30 years	By initial recruitment
62	Telephone Attendant BS-5	SSC or equivalent qualification from a recognized Institute/Board	18-30 years	By initial recruitment
63	Painter BS-4	Three years experience certificate in the relevant field from a reputable Firm/ Institute	18-30 years	By initial recruitment



**MALAKAND IRRIGATION DIVISION MALAKAND SENIORITY LIST OF BELDARS.**

S.L No	Name	Father Name	Designation	Qualification	D.O.B	Date of Appointment	Date of Promotion
1	Hussain Bacha	Chulam Bacha	Beldar		1968	10.3.1986	
2	Amir Hussain	Hazrat Hussain	Beldar		12.2.1968	1.3.1987	
3	Bacha Rahman	Azizur Rahman	Beldar		1965	1.11.1988	
4	Khatia Rahman	Masal Khan	Beldar		18.07.1965	1.9.1989	
5	Sher Zada	Siriland Khan	Beldar		1967	1.10.1989	
6	Javez Khan	Darvaish Khan	Beldar		1968	12.5.1990	
7	Sher Muhammad	Guam Sediq	Beldar		1968	12.5.1990	
8	Said Naem	Muhammad Amin	Beldar		1966	1.7.1990	
9	Sher Rahman	Saleem Khan	Beldar		1.1.1967	8.8.1990	
10	Muhammad Hussain NO.1	Alam	Beldar		1964	1.6.1992	
11	Maqbool Sher	Mr Muhammad	Beldar		1970	4.9.1984	
12	Fazal Muhammad	Said Akbar	Beldar		12.3.1973	13.09.1995	
13	Habibullah	Rahmawan	Beldar		8.2.1976	12.09.1995	
14	Javid Ahmad	Abdul Hamid	Beldar		1.1.1976	01.10.1995	
15	Qaiser Khan	Awai Khan	Beldar		2.2.1976	1.10.1995	
16	Muhammad	Gul Pur	Beldar		10.2.1978	16.07.1998	
17	Bahadar Khan	Sher Afzal	Beldar		1965	4.11.1996	
18	Muhammad Nawaz	Muhammad Ali Khan	Beldar		1972	6.11.1996	
19	Sherafat Ali Shah	Maqbool Shah	Beldar	BA	30.03.1978	13.03.2004	
20	Muhammad Basher	Shah Jansha	Beldar		5/2/1977	8.04.2004	
21	Muhammad Idrees	Muhammad Javed	Beldar	Metric	09.01.1985	10.04.2004	
22	Amir Jan	Khan	Beldar		1.7.1986	12.4.2004	
23	Abdul Hamid	Bismil Shah	Beldar		1.3.1988	12.4.2004	
24	Sher Jan	Muhammad Jan	Beldar		1.7.1973	12.4.2004	

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Date: 11/11/2010

25	Rahmatullah Khan	Zafar Khan	Beldar		1.7.1976	12.4.2004	
26	Javed Khan	Abdur Rahman	Beldar	SSC	1.1.1976	12.04.2004	
27	Muhammad Saeed	Gulzarin	Beldar		1.7.1976	12.4.2004	
28	Mustaqgem Becha	Abdur Raziq	Beldar		1.7.1977	12.4.2004	
29	Hujat Ali	Zagrawar	Beldar	MA	9.1.1978	12.4.2004	
30	Amin Said	Noor Ghanl	Beldar		1.7.1978	12.4.2004	
31	Mumtaz Gul	Taza Gul	Beldar	Matric	12.2.1979	12.4.2004	
32	Amin Badshah	Lal	Beldar	FA	12.2.1979	12.4.2004	
33	Muhammad	Muhammad	Beldar		2.2.1980	12.4.2004	
34	Yas Zamin	Momin Khan	Beldar		01-07-1973	22.04.2004	
35	Nizamuddin	Mubarak Ali	Beldar		31-12-1986	01-10-2007	
36	Shahid Khan	Abdul Khan	Beldar		02-02-1976	01-10-1995	
37	Umar Hayat	Sabir Khan	Beldar		3.3.1980	1.4.2009	
38	Muhammad Ali	Muhammad Ullah	Beldar		15.01.1986	8.04.2009	
39	Muhammad Ali	Muhammad Khan	Beldar		30.08.1978	9.4.2009	
40	Muhammad Ali	Muhammad Khan	Beldar		1978	10.4.2009	
41	Muhammad Ali	Muhammad Khan	Beldar		7.3.1982	10.4.2009	
42	Muhammad Ali	Mirza Khan	Beldar		7.3.1982	10.4.2009	
43	Muhammad Ilyas	Gul Hakeem	Beldar		7.8.1989	10.4.2009	
44	Sabir Khan	Hameed Khan	Beldar		20.02.1986	11.4.2009	
45	Wali Khan	Ibrahim	Beldar	SSC	12.02.1987	11.04.2009	18.10.2010
46	Abdul Wahab	Sultan Mehmood	Beldar	Matric	2.3.1973	11.4.2009	
47	Aisar Ali	Muhammad Jan	Beldar		1984	14.04.2009	
48	Shah Faisal	Naik Amal	Beldar	Matric	17.04.1985	20.04.2009	
49	Amal Khan	Saeed Gul	Beldar		12.6.1978	27.04.2009	
50	Muhammad	Fazal Khaliq	Beldar		22.03.1975	10.11.2009	
51	Ashfaq Ahmad	Sher Zamin	Beldar	FA	23.03.1980	13.07.2010	28.04.2019
52	Imran Khan	Abdul Khaliq	Beldar	Matric	16.02.1985	1.11.2010	

Ex-Officio  
 Head of Division  
 District Office  
 District of Beldar

محمد شجاع الدین  
 محمد شجاع الدین

53	Rehman Said	Faleh Said	Beldar	Matric	17.04.1975	1.11.2010	(13)
54	Muhammed Yaqoob Khan	Habib Rasool	Beldar		24.04.1968	1.11.2010	
55	Hassan Khan	Zigrawar Khan	Beldar	SSC	3.1.1985	23.11.2012	
56	Abdullah	Bacha Muhammed	Beldar		20.02.1964	26.11.2012	
57	Shah Zaman	Noor Zaman	Beldar	SSC	3.1.1988	9.10.2014	
58	Syed Samiullah	Sayed Gulab Shah	Beldar	SSC	14.04.1989	14.10.2014	
59	Mohsin Shah	Muzamil Shah	Beldar		15.03.1995	14.11.2014	
60	Hazrat Usman	Sawab Khan	Beldar		10.1.1990	15.12.2014	
61	Nizam-ud-Din	Muhammed Jah	Beldar		1.8.1991	11.3.2016	
62	Asif Ali	Wazir Zada	Beldar	SSC	15.04.1992	22.10.2015	
63	Abid Ullah	Zoortalab	Beldar		18.03.1994	17.12.2015	
64	Zafar Hussain	Sher Ali	Beldar	Matric	14.02.1992	22.12.2015	
65	Manzoor Ali	Bakht Zada	Beldar	FA & DITone eyer	16.03.1985	14.01.2016	
66	Naveed Shah	Amir Shah	Beldar	SSC	18.02.1996	16.01.2016	
67	Shah Zaib Ur Rahman	Gul Rahman	Beldar	Diplom a Aes:Eng g	10.2.1993	11.2.2016	
68	Ikram Khan	Muhammed Khan	Beldar	SSC	1.4.1984	1.4.2016	
69	Ayaz Muhammad	Nazir Muhammad	Beldar		1.1.1982	5.4.2016	
70	Safiullah	Hidayatulla h	Beldar		1.1.1998	29.04.2016	
71	Said Bacha	Izat Muhamma d	Beldar	Matric	19.02.1998	9.5.2016	
72	Asmat Ullah	Niamet Ullah	Beldar		14.03.1982	7.6.2016	
73	Nowshad	Shah Sawaar	Beldar		2.1.1981	11.7.2016	
74	Shahid Ali	Ghani Khan	Beldar	SSC	2.2.1986	11.7.2016	
75	Zia Ullah	Rahmullah	Beldar		1.1.1996	12.7.2016	
76	Muhammad Zia	Muhammed Khan	Beldar	DAE	25.04.1994	22.07.2016	
77	Bakht Amin	Rahim Khan	Beldar		8.9.1992	22.07.2016	
78	Nasar Khan	Noor Khan	Beldar		15/10/1990	22/7/2016	

*Asif*  
 Ex-RC Officer  
 Muzakki Investigation Division  
 Islamabad

Handwritten notes and stamps at the top of the page, including a signature and some illegible text.

105	Muhammad Azam	Ali Muhammad	Beldar	FA	07.1987	20.09.2017
104	Baqar Khan	Shah Nawaz Khan	Beldar		14.1991	8.9.2017
103	Haseeb Habib	Habib Ullah Khan	Beldar	Matric	20.01.1990	8.8.2017
102	Zeb Alam	Shah Bahader Khan	Beldar		1.1.1984	2.8.2017
101	Humayun Khan	Munir Khan	Beldar	O.A.E	1.1.1979	9.6.2017
100	Imran Khan	Baqeem	Beldar	Matric	7.4.1993	15.03.2017
99	Fazal Subhan	Sultan Muhammad	Beldar		1981	10.3.2017
98	Kabeem Ullah	Akram Ullah	Beldar	SSC	15.04.1998	8.3.2017
97	Bilal ud Din	Misbah-ud-Din	Beldar	Matric	25.02.1993	1.3.2017
96	Straj-ud Din	Palou-ud-Din	Beldar	Matric	4.4.1987	10.2.2017
95	Shahid Islam	Umar Zada	Beldar	Matric	10.2.1982	4.11.2016
94	Saimo Khan	Saqib Khan	Beldar	BA	25.03.1982	2.11.2016
93	Zubair Khan	Khan Zada	Beldar		1.1.1987	8.9.2016
92	Shahid Islam	Fazal Khan	Beldar	D.A.E	15.01.1990	10.8.2016
91	Yad Khan	Dava Khan	Beldar	Matric	1.4.1979	10.8.2016
90	Mehran Khan	Rahim Ullah	Beldar	Matric	13.07.1998	10.8.2016
89	Xadood Saif	Rahim Saif	Beldar	D.A.E	1.3.1989	10.8.2016
88	Muhammad Saif	Imdad Khan	Beldar	Matric	5.3.1988	10.8.2016
87	Ali Ali	Rab Nawaz	Beldar		20.03.1984	25.07.2016
86	Umar Rahman	Said Gul	Beldar		2.8.1984	26.7.2016
85	Muhammad Nawaz	Mudaza Khan	Beldar	FA	13.03.1992	25.07.2016
84	Nisar Ali	Muhammad	Beldar		1/1/1988	25/07/2016
83	Hoyal Ullah	Hameh Gul	Beldar		1.1.1977	25.07.2016
82	Khalid Khan	Naik Nasir	Beldar		1983	25.07.2016
81	Shah Ghani	Haseem Khan	Beldar		4.8.1970	25.7.2016
80	Qasir Khan	Zaullah Khan	Beldar		6.2.1987	23.07.2016



Imran Ali	Fazal Wahid	Beldar	Matric	10.03.1990	10.10.2017	(15)
Darya Khan	Feroz Khan	Beldar		30.04.1985	23.10.2017	
Hayat Ur Rahman	Ghani Ur Rahman	Beldar		06.04.1982	30.10.2017	
Ijaz Ahmad	Nawab Khan	Beldar	BA	08.01.1987	21.02.2018	
Iqbal Hussain	Gul Hussain	Beldar	SSC	10.03.1979	26.02.2018	
Basit Ali	Israr Ullah	Beldar		10.03.2000	22.11.2018	
Haseeb Ur Rahman	Zahid Hussain	Beldar	SSC	05.04.1999	22.01.2018	
Imran Bakh	Bakhtawar Zada	Beldar	SSC	10.04.1996	24.11.2018	
Farooq Zada	Hassan Zada	Beldar	FA	07.03.1998	15.03.2019	
Ateeg Ur Rahman	Bakhtawar Khan	Beldar	BA	14.01.1992	8.04.2019	
Saleem Ullah	Khan Sahib	Beldar	SSC	18.01.1989	28.02.2018	
Imran Ali	Nadar Khan	Beldar	SSC	16.03.1993	02.05.2019	
Pervaiz Khan	Zor Zamin	Beldar		01.01.1987	02.05.2019	
Jehan Zeb	Malk-e-Aman	Beldar		1984	02.05.2019	
Umar Ullah	Aze Ullah	Beldar	FA	01.05.1994	06.05.2019	
Muhammad	Fazal Wahid	Beldar		27.05.1998	07.05.2019	

*Asad*  
E/Clerk

*[Signature]*  
TNC  
Malakand Irrigation Division  
Faisalabad

Annex <sup>2</sup>E

8 (16)



**OFFICE OF THE EXECUTIVE ENGINEER**  
**MALAKAND IRRIGATION DIVISION MALAKAND**

Ph: No. 0932-410492

No. 702A /7-E (Sub),

Dated Malakand the 25/04/2019

**OFFICE ORDER.**

Consequent upon recommendation of the Departmental Promotion Committee in its meeting held on 25/04/2019, Mr. Yaqoob Said Beldar attached to Bazai Irrigation Sub Division, Katlang is hereby promoted as Gauge Reader (BS-07) with immediate effect in the public interest.

EXECUTIVE ENGINEER,

Copy forwarded for information & necessary action to the:-

- 1/ District Accounts Officer, Malakand.
- 2/ Sub-Divisional Officer Bazai Irrigation Sub Division, Katlang.
- 3/ D.A.O. (Local) / H.C (Local).

EXECUTIVE ENGINEER,

- (4) - انگریز انجینئر صاحب ذہن شیخ عابد علی صاحب
- (3) - جناب حفصہ انجینئر صاحبہ ذہن شیخ عابد علی صاحب
- (2) - انگریز انجینئر صاحب ذہن شیخ عابد علی صاحب
- (1) - جناب صاحب وقت وقت شیخ عابد علی صاحب

03469307899: رابطہ نمبر

انجینئر (ایئر کونڈیشننگ) صاحب ذہن شیخ عابد علی  
 انجینئر (پلمب) صاحب ذہن شیخ عابد علی  
 انجینئر

11-01-2020

میں نے انجینئر صاحب ذہن شیخ عابد علی صاحب سے رابطہ کیا اور ان سے کہا کہ انہیں انجینئر کے طور پر اپنا نام لکھنے کے لیے درخواست دی جائے۔ انہوں نے کہا کہ وہ انجینئر کے طور پر اپنا نام لکھنے کے لیے درخواست دیں گے۔ انہوں نے کہا کہ وہ انجینئر کے طور پر اپنا نام لکھنے کے لیے درخواست دیں گے۔ انہوں نے کہا کہ وہ انجینئر کے طور پر اپنا نام لکھنے کے لیے درخواست دیں گے۔

جناب عالی:

انجینئر صاحب ذہن شیخ عابد علی صاحب (انگریز انجینئر) صاحب ذہن شیخ عابد علی صاحب (انگریز انجینئر) صاحب ذہن شیخ عابد علی صاحب (انگریز انجینئر)

انجینئر صاحب ذہن شیخ عابد علی صاحب (انگریز انجینئر) صاحب ذہن شیخ عابد علی صاحب (انگریز انجینئر) صاحب ذہن شیخ عابد علی صاحب (انگریز انجینئر)

Chief Engineer Supervisor  
 Eng'g Deptt

(17)

18

No. 236

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Received a registered\* addressed to \_\_\_\_\_

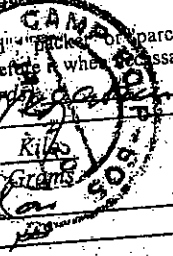
Date Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before, when necessary. (in words)

If insured. { Insured for Rs. (in figures) \_\_\_\_\_ Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ Weight (in words) \_\_\_\_\_ Kilo grams \_\_\_\_\_ Name and address of sender \_\_\_\_\_

#

50/





19

-B-

No. 245

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due. Rs. Ps.

Received a registered\* addressed to Chaf

Initials of Receiving Officer Chaf \*Write here "letter", "postcard", "packet" or "parcel" with the word "Post Office" when necessary.

Insured for Rs. (in figures) 11-01-20 (in words) 11 rupees 1 paise 20 Weight 200 Kilo Grams  
Insurance fee Rs. 01 Ps. (in words) one paise  
Name and address of sender Chaf

20

o. 241

For Insurance Notices see reverse. Rs. Ps. 50-  
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered\*  
addressed to \_\_\_\_\_  
Date Stamp \_\_\_\_\_  
\*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.  
Name of Receiving Officer \_\_\_\_\_  
Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_  
Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_  
Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_  
Name and address of sender \_\_\_\_\_  
14-01-22

o. 242

For Insurance Notices see reverse. Rs. Ps. 50-  
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered\*  
addressed to \_\_\_\_\_  
Date Stamp \_\_\_\_\_  
\*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.  
Name of Receiving Officer \_\_\_\_\_  
Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_  
Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_  
Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_  
Name and address of sender \_\_\_\_\_  
14-01-22

o. 243

For Insurance Notices see reverse. Rs. Ps. 50-  
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered\*  
addressed to \_\_\_\_\_  
Date Stamp \_\_\_\_\_  
\*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.  
Name of Receiving Officer \_\_\_\_\_  
Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_  
Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_  
Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_  
Name and address of sender \_\_\_\_\_  
14-01-22

(21) H

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No/2173/2020

Abdul Wahab S/O Sultan Mehmood, Beldar Malakand Irrigation Division,  
Malakand.....Appellant

**V E R S U S**

1. Superintendent Engineer, Irrigation Department, Circle Mardan.
2. Chief Engineer, Irrigation Department, South, Khyber Pakhtunkhaw, Peshawar.
3. Secretary, Irrigation Department, Khyber Pakhtunkhaw, Peshawar.
4. Executive Engineer, Malakand Irrigation Division, Malakand.
5. Ashfaq Ahmad S/O Sher Zamin, Gauge Reader, Malakand Irrigation Division, Malakand.
6. Yaqoob Said S/O Rahim Said, Gauge Reader, Malakand Irrigation Division, Malakand. ....Respondents

7. M. Bashir.

8. Masud Isha ) implemented order dt: 5-2-21

**APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR THE PROMOTION OF THE APPELLANT AS GAUGE READER AND FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT DATED 14-01-2020 HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:-**

On acceptance of this appeal the appellant may kindly be ordered to be promoted as Gauge Reader (BPS-05) from 25-04-2019, i.e date his juniors were promoted with all back benefits.

**Respectfully Submitted:-**

1. That the appellant is highly qualified, has passed his Intermediate and was initially appointed as Chowkidar BPS-01 on 07-04-2009 and was redesignated as Beldar on 18-10-2010 and since then he performed his duties with honesty and full devotion and to the entire satisfaction of his high ups. (Copies of Orders dated 07-04-2009 & 18-10-2010 are enclosed as Annexure A & B).
2. That since appointment/re-designation as Beldar the appellant has not been promoted despite having more than 11 years of unblemished service record while he is perfectly fit and eligible and coming up to the criteria for promotion to the post of Beldar.

22  
-2-

3. That according to the rules 50% posts of Gauge Reader are to be filled by initial recruitment while 50% posts are to be filled by promotion on the basis of seniority cum fitness from amongst the Mate, Regulation Beldar and Beldar having SSC qualification and ten years' service in the circle. **(Copy of Rules if enclosed as Annexure C).**
4. That according to the Seniority of the Beldars of Malakand Irrigation Division, Malakand the appellant is placed at Serial No 46 while his other colleagues who are placed below the appellant at Serial No 51 and 88 have been promoted in violation of law and rules on the subject. Respondent No 5 has been promoted as Gauge Reader (BPS-05) on 25-04-2019 while the exact date of promotion of respondent No 6 is not provided to the appellant. **(Copy of Seniority List is enclosed as Annexure D).**
5. That the appellant filed departmental appeal for his promotion as Gauge Reader (BPS-05) on 14-01-~~2019~~ to respondent No 1 however the same has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of departmental appeal & Post office receipts are enclosed as Annexure E).**
6. That ~~the~~ this action of the respondents of not promoting the appellant as Gauge Reader (BPS-05) in the quota reserved for the promotion, is against the law, facts and principles of justice on grounds inter-alia as follows:-

**GROUND:-**

- A. That the omissions and commissions of the respondents are illegal, unlawful without lawful authority and void ab initio.
- B. That mandatory provisions of law have been violated by the respondents and the appellant has not been treated according to law and rules and more particularly rules governing the subject.
- C. That the appellant is perfectly fit and eligible and coming up to the criteria set forth in law and rules but malafidely has not been promoted.
- b. That even as per the rules/law the appellant is entitled having more than the required length of service besides qualification for promotion as Gauge Reader.


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- E. That even juniors including respondent No 5 & 6 have been prompted in violation of the rules on the subject denying the same treatment to the appellant..
- F. That there is no omission or commission on part of the appellant and he could not be punished for the fault of others if any.
- G. That respondents have appointed three Gauge Readers in the Baizai Irrigation Scheme of the same division, thus too the appellant is entitled to be prompted as Gauge Reader.
- H. That the appellant has more than 11 years of service with unblemished service record.


**It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.**

**Any other relief deemed appropriate in the circumstances of the case and not specifically asked for may also be granted in favor of the appellant.**

**Dated:-08-10-2020**

  
**Appellant**  
**(Abdul Wahab)**

**Through**

  
**FAZAL SHAH MOHMAND**  
Advocate,  
Supreme Court of Pakistan.

(24) \$

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

**APPEAL NO. 12173/2020**

Mr. Abdul Wahab.....(Appellant)

**Versus**

1. Superintending Engineer, Mardan Irrigation Circle Mardan.
2. Chief Engineer (South), Irrigation Department Peshawar.
3. Secretary to Govt: of Khyber Pakhtunkhwa Irrigation Department Peshawar.
4. Executive Engineer, Malakand Irrigation Division Malakand.
5. Ashfaq Ahmad S/O Sher Zamin G.R Malakand Irrigation Division Malakand.
6. Yaqoob Said S/O Rahim Said G.R Malakand Irrigation Division Malakand.

**(Respondents)**

**A. PRELIMINARY OBJECTIONS:-**

1. That the appellant has got no cause of action.
2. That appeal of appellant is time bared, hence liable to be dismissed on this score.
3. That the appellant has preferred the appeal in order to pressurize the incumbent answering respondents.
4. That the appellant has not come to this court with clean hands.
5. That the appellant has no locus standi to prefer the present appeal.
6. The appeal is bad in its present form.
7. That this Honorable Tribunal has got no jurisdiction to entertained this appeal.

**RESPECTFULLY SHEWETH:**

1. The para is corrected to the extent that the appellant was appointed as Chowkidar BPS 01 on 07/04/2009 and latter on re-designated as a Beldar in the same basic pay scale i.e. BPS-01 on 18/10/2010 on his own request.
  2. The para is incorrectly drafted, as the appellant is already serving as a Beldar however the name of appellant has been included in the seniority list of Beldars of Malakand Irrigation Division Malakand and the promotion of the appellant would be considered on his turn subject to recommendation of departmental promotion committee.
  3. The rules as quoted for promotion are correct and would be followed by the Departmental Promotion Committee in its meeting/ meetings subject to availability of vacancy.
  4. The respondent No. 05 Mr. Ashfaq Ahmad S/O Sher Zameen have not yet been promoted as Gauge Reader rather re-designated as Beldar vide Executive Engineer, Malakand Irrigation Division Malakand office order No.831/7-E(Sub), dated 02-05-2019 (copy of
- Mr.

25

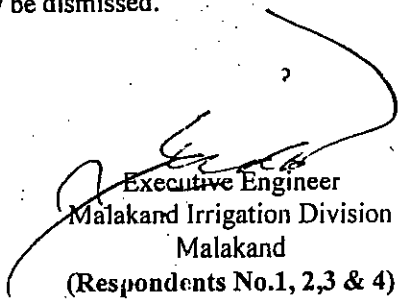
office order is attached as Annexure-A) whereas the respondent No.06 Mr. Yaqoob Said Beldar was promoted as Gauge Reader vide Executive Engineer Malakand Irrigation Division Malakand office order No 708/7-E(sub) dated 25/04/2019 (copy of office order is attached as Annexure-B) through Departmental Promotion Committee meeting held on 25-04-2019, minutes of the Department Promotion Committee meeting is attached as Annexure-C).

5. The para is correct to the extent that the appellant filed Departmental appeal on 14-01-2020 for cancellation of promotion of some already promotion officials & his promotion as Gauge Reader, which was not worth consideration at this belated stage and therefore not considered being badly time barred. However the promotion of the appellant will be considered at his own turn subject to availability of post and clearance by the Department Promotion Committee.
6. As explained in para-2 above, the promotion of Mr. Abdul Wahab, Beldar to the post of Gauge Reader would be considered at his own turn subject to recommendation of the Departmental Promotion Committee upon availability of the post.

#### GROUND

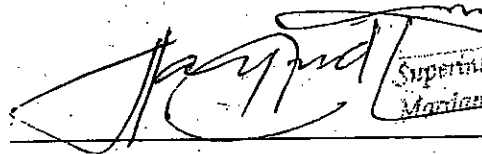
- A. No irregularity has been made by the incumbent respondents in the instance appeal.
- B. The respondent will be treated according to the law and rules by considering the promotion to the post of Gauge Reader on his own turn under relevant quota subject to recommendation of the Departmental Promotion Committee and availability of vacancy.
- C. The eligibility and fitness of the appellant according to the criteria set forth in the law and rules would be examined by the Departmental Promotion Committee at his own turn. The appellant cannot establish his right by himself.
- D. As per Para "C" above.
- E. The re-designation of respondent NO.5 and promotion of respondent No.6 have been considered by the Departmental Promotion Committee in its meeting held on 25-04-2019.
- F. The appellant has not been punished but the appellant was to be considered for promotion as explained in para 2 above.
- G. The 03-Nos Gauge Reader of Bazai Irrigation scheme were recruited through fresh appointment against the newly created post, therefore the appeal of the appellant for promotion against one of the mentioned posts is unjustified.
- H. As per Para "C" above.

Keeping in view the above explanation, it is therefore humbly prayed that upon the acceptance of above replies, the instance appeal of the appellant may kindly be dismissed.

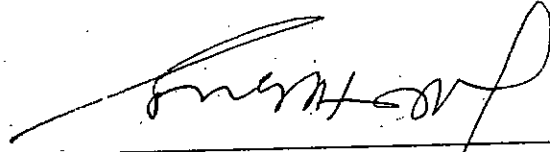
  
Executive Engineer  
Malakand Irrigation Division  
Malakand  
(Respondents No.1, 2,3 & 4)

26

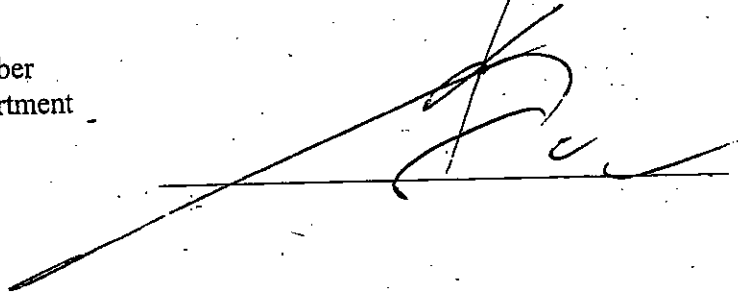
- 1- Superintending Engineer,  
Mardan Irrigation Circle,  
Mardan.  
(Respondent 01)

  
Superintending Engineer  
Mardan Irrigation Circle  
Mardan

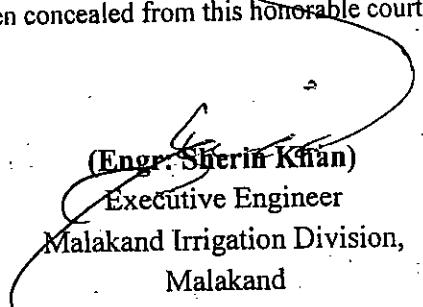
- 2- Chief Engineer (South),  
Irrigation Department  
Peshawar.  
(Respondent 02)

  
\_\_\_\_\_

- 3- Secretary to the Govt: of Khyber  
Pakhtunkhwa Irrigation Department  
Peshawar.  
(Respondent 03)

  
\_\_\_\_\_

I Engr: Sherin Khan Divisional Canal Officer/Executive Engineer, Malakand Irrigation Division Malakand do hereby solemnly affirm and declare on oath that the contents of the subject replies are true and correct to the best of my knowledge and nothing has been concealed from this honorable court.

  
(Engr. Sherin Khan)  
Executive Engineer  
Malakand Irrigation Division,  
Malakand  
(Respondent 04)



27

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No 12173 /2020

Abdul Wahab S/O Sultan Mehmood, Beldar Malakand Irrigation Division,  
Malakand.....Appellant



**V E R S U S**

1. Superintendent Engineer, Irrigation Department, Circle Mardan.
2. Chief Engineer, Irrigation Department, South, Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Irrigation Department, Khyber Pakhtunkhwa, Peshawar.
4. Executive Engineer, Malakand Irrigation Division, Malakand.
5. Ashfaq Ahmad S/O Sher Zamin, Gauge Reader, Malakand Irrigation Division, Malakand.
6. Yaqoob Said S/O Rahim Said, Gauge Reader, Malakand Irrigation Division, Malakand. ....Respondents

**APPEAL APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 FOR THE PROMOTION OF THE APPELLANT AS GAUGE READER AND FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT DATED 14-01-2020 HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:-**

On acceptance of this appeal the appellant may kindly be ordered to be promoted as Gauge Reader (BPS-05) from 25-04-2019, i.e date his juniors were promoted with all back benefits.

**Respectfully Submitted:-**

1. That the appellant is highly qualified, has passed his Intermediate and was initially appointed as Chowkidar BPS-01 on 07-04-2009 and was redesigned as Beldar on 18-10-2010 and since then he performed his duties with honesty and full devotion and to the entire satisfaction of his high ups. (Copies of Orders dated 07-04-2009 & 18-10-2010 are enclosed as Annexure A & B).

Certified to b2: That since appointment/re-designation as Beldar the appellant has not been promoted despite having more than 11 years of unblemished service record while he is perfectly fit and eligible and coming up to the criteria for promotion to the post of Beldar.

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

18.01.2024

Appeal No. 12173/2020 (28)  
Abdul Wahab vs Govt



Appellant in person present. Mr. Muhammad Bashir,

Sub-Engineer alongwith Mr. Muhammad Jan, District

Attorney for official respondents present. Private respondent

No. 8 in person also present.

Appellant requested for adjournment on the ground that his counsel is unable to attend the Tribunal due to strike of lawyers. Adjourned. To come up for arguments on 13.03.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED  
KEST  
Peshawar

\*Naeem Amin\*

(Muhammad Akbar Khan)  
Member (E)

(Salah-ud-Din)  
Member (J)

Appeal with permission  
to grant proper remedy  
against the pending orders  
directing to the appellant  
13-3-2024  
Adm

1. Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.
2. Former requested for withdrawal of the instant appeal to avail proper remedy. As a token of admission of his submission he signed the margin of order sheet. Disposed of accordingly. Consign.
3. Pronounced in open Court at Peshawar under our hands and seal of the Tribunal on this 13<sup>th</sup> day of March, 2024.

(Muhammad Akbar Khan)  
Member (E)

(Kalim Arshad Khan)  
Chairman

\*Adnan Shah\*

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

خدمت جناب اینٹیشن ایری کیشن ملاکنڈ

عنوان - فراہمی پروموشن آرڈرز  
28A  
Right to Information Act  
جناب عالی!

مکو دیا نہ گزارش ہے کہ بندہ کو جوابی

حکومت کے Right to Information ایکٹ کے تحت

درج ذیل بیلڈر جو کہ بیلڈر سے گنج آرڈرز کو

پوچھتے ہیں ان آرڈرز کا کیا مطالبہ ہیں -

مہربانی کر کے فراہم فرما کر شکور فرماویں -

① مسعود موجودہ عہدہ گنج رٹڈر

② بشیر موجودہ گنج رٹڈر

③ یعقوب سید گنج رٹڈر

الحارثی 23/4/24

محمد سکندر چیمبر

عبدالرحمن بیلڈر

آلو کائنات سیشن

0346 9307899

288

For Notices and Receipts  
Stamp No. 124693463

60

Weight  
The weight of the contents of the  
package must be indicated in the  
acknowledgment as follows:

Weight of  
contents of  
package  
in  
grams

Write here "letter", "postcard", "packet" or "parcel"  
with the word "insured" before it when necessary

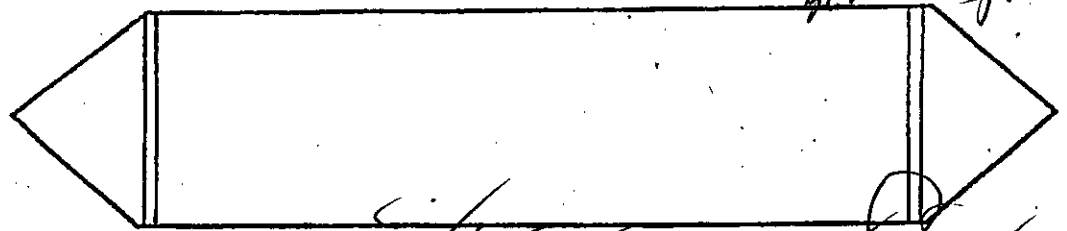
Insured for Rs. 18750/-

Insured for Rs. 18750/- (in words) Eighteen thousand

Name and  
address  
of sender  
Shri. S. S. S. S.

کتابخانه

وزن  
مقدار  
دستی  
گرم



بجائے کتب خانہ

(29)

مقدمہ

Dr. J. S. ...

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Dr. J. S. ...  
Fazal Shah Akhond  
آئی جی

