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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO

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Muhammad Raza VS Govt of K.P

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26/6/24

Muharir Compilation

25/6/24

Incharge Judicial Branch

(20)

ANX — E

OFFICE OF THE DISTRICT HEALTH OFFICER SWABI

Office Tel: 0938-300053, Fax: 0938-300051

No. 18876-78/M.7 DHO Swabi Dated: 22 / 11 / 2017

To

1. Dr. Subhanullah s/o Amir Sher Mursal Banda VPO Kalabat Tehsil Topi and District Swabi
2. Dr. Ijaz Ahmad s/o Shams Khan House No. 01 Education Colony Near Lady Griffth Girls Higher Secondary School Peshawar
3. Dr. Ishfaq Ahmad s/o Shams Khan House No. 01 Education Colony Near Lady Griffth Girls Higher Secondary School Peshawar

SUBJECT: NON VERIFICATION OF ONLINE PMDC VERIFICATION AND RECOVERY OF SALARIES PAID TO YOU

On instruction of Department of Health we conducted online verification of PMDC registration No. of all the doctors. Your PMDC registration was not confirmed online. When we called you to the office you did not come to the office and since then your mobile no. is OFF and you are absent from your duties. This confirm that your PMDC Registration was bogus and you manage to get it from PMDC by illegal means.

You are hereby directed to deposit salary drawn by you in the office of undersigned within 15 days otherwise police will be requested to take necessary action against you under Law for fraud.

District Health Officer
Swabi

No 18879-80/M.7 /DHO Swabi Dated 22-11-17

Copy forwarded to the: -

- Director General Health Services Khyber Pakhtunkhwa Peshawar with comments that salaries of above mentioned doctors was started on receipt of verification through letter as per standard procedure, it mean that they have some link with the staff of PMDC Office to managed all this for them. It is requested that PMDC authorities may please be approached to conduct proper inquiry and Health Department may please be approach for termination of their services.
- PS to Secretary Health Khyber Pakhtunkhwa Peshawar

District Health Officer
Swabi

C-T-C

S.A No. 1563/2019

17.05.2024 1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Dr. Noor Badshah, Veterinary Officer for the respondents present.

2. Representative of respondent stated that they will call the appellant and consider him for promotion to the post of Junior Clerk in the upcoming department promotion committee meeting subject to passing of typing test and if they otherwise fulfill the criteria. As a token of admission of his submission, he signed the margin of order sheet.

3. In view of the above, the instant appeal is disposed of accordingly. Consign.

4. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 17th day of May, 2024.*

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

Kaleemullah

(2)

18.04.2024 1. Learned counsel for the appellant present. Mr. Arshad Azam learned Assistant Advocate General alongwith Dr. Shahid Ullah, Veterinary Officer for the respondents present.

2. Record mentioned vide previous order sheet not submitted. Representative of respondent sought further time for submission of the same. Absolute last and final chance is given. To come up for record and arguments on 09.05.2024 before D.B. P.P given to parties.

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

Kaleemullah

09th May, 2024 1. Clerk to counsel for the appellant present. Dr. Noor Badshah, Veterinary Officer alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Counsel are on strike. Being an old case of the year 2019, therefore, adjourned for 17.05.2024 for arguments before the D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)
Member (Executive)

(Kalim Arshad Khan)
Chairman

Naeem Amin

(3)

15.01.2024 Clerk of learned counsel for the appellant present. Mr. Shahid Ullah, Veterinary Officer alongwith Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to attend the Tribunal due to strike of lawyers. Adjourned. To come up for arguments on 01.03.2024 before the D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)
Member (E)

(Salah-ud-Din)
Member (J)

Naeem Amin

01.03.2024 1. Counsel for the appellant present. Mr. Muhammad Jan District Attorney for the respondents present.

2. Respondents are directed to produce call letters issued to the appellant for typing test & interview alongwith working paper of the DPC meeting, before the date fixed. To come up To come up for arguments on 16.02.2024 before D.B. P.P given to the parties.

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

Fazle Subhan, P.S

(9)

12th June, 2023

1. Clerk of counsel for appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

2. Lawyers are on strike. Therefore, case is adjourned to 20.09.2023 for arguments before D.B. P.P given to the parties.

(Fareeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman

SCANNED KPST Peshawar

*Mutazem Shah *

20th Sep,2023

1. Junior to counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Dr. Shahid Ullah, Veterinary Officer for the respondents present.

SCANNED KPST Peshawar

2. Junior to counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Last opportunity is granted. To come up for arguments on 15.01.2024 before D.B. P.P given to the parties.

(Muhammad Akbar Khan)
Member (E)

(Kalim Arshad Khan)
Chairman

Kamranullah

05.01.2023 Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Last opportunity is granted to argue the case on the next date, failing which the case will be decided on available record without arguments. Adjourned. To come up for arguments on 03.04.2023 before D.B.

(Mian Muhammad)
Member (E)

(Kalim Arshad Khan)
Chairman

03.04.2023 Junior to counsel for appellant present.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Furqan Ahmad Assistant for respondents present.

File to come up alongwith connected Service Appeal No.1563/2019 titled "Ejaz Ullah Vs Government of Khyber Pakhtunkhwa" on 12.06.2023 before D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan)
Member (E)

(Rozina Rehman)
Member (J)

(6)

14.07.2022 Mr. Imran Khan, Advocate (junior of learned counsel) for the appellant) present. Dr. Anwar Bakhsh and Dr. Shahid Ullah alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 14.09.2022 before the D.B.

(Rozina Rehman)
Member (J)

(Salah-ud-Din)
Member (J)

14.09.2022 Learned counsel for the appellant present. Dr. Noor Badshah, Veterinary Officer and Dr. Shahid Ullah, Farm Manager alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 17.11.2022 before the D.B.

(Mian Muhammad)
Member (E)

(Salah-Ud-Din)
Member (J)

17th Nov. 2022 Clerk of counsel for the appellant present.

Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Lawyers are on general strike. To come up for arguments on 05.01.2023 before the D.B.

(Fareeha Paul)
Member(E)

(Rozina Rehman)
Member(J)

7

7-3-22

Due to Retirement of the Hon'ble Chairman the case is adjourned to 9-5-22

09.05.2022 Appellant in person present. Dr. Sajjad Ullah alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is out of station today. Adjourned. To come up for arguments on 14.07.2022 before the D.B.

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

11.11.2020 Appellant in person present. Mr. Usman Ghani learned District Attorney alongwith Jamshaid Legal Officer for respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 27.01.2021 for hearing before the D.B.

Chairman

(Atiq-ur-Rehman Wazir)
Member (E)

27.01.2021 Due to pandemic of Covid-19, the case is adjourned to 15.04.2021 for the same.

Reader

15.04.2021 Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 04.08.2021 for the same as before.

Reader

04.08.2021 Appellant present through counsel.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Shahid Ullah Form Manager for respondents present.

File to come up alongwith connected Service Appeal No. 1563/2019 titled Ejaz Ullah Vs. Government of Khyber Pakhtunkhwa on 29.11.2021 before D.B.

(Atiq-Ur-Rehman Wazir)
Member (E)

(Rozina Rehman)
Member (J)

29.11.2021 Due to unavailability of DB, the case is adjourned to 07.03.2022.

Reader

16.04.2020 Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 16.07.2020 before D.B.

Reader

16.07.2020 Due to COVID-19, the case is adjourned for the same on 01.09.2020 before D.B.

Reader

01.09.2020 Appellant present in person.

Mr. Muhammad Jan learned Deputy District Attorney alongwith Dr. Shahid Ullah Veterinary Officer for the respondents present.

Appellant submitted rejoinder and requested for adjournment as his counsel is not available. Adjourned. To come up for arguments on 11.11.2020 before D.B.

(Attiq ur Rehman)
Member (E)

(Rozina Rehman)
Member (J)

23.12.2019 Appellant with counsel present. Preliminary arguments heard.

The appellant (Class-IV) has filed the present service appeal being aggrieved against the promotion orders dated 15.05.2019 and 22.07.2019 on the ground that through the said promotion orders Class-IV colleagues junior to the appellant were promoted to the post of Junior Clerk in violation of relevant rules for promotion of Class-IV against 33% vacancies of Junior Clerks.

Points urged need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 21.02.2020 before S.B

Member

21.02.2020 Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith M/S Jamshad Akhtar, Legal Officer and Shahid Ullah, Veterinary Office for the respondents present. Representatives of the department submitted para-wise comments on behalf of respondents No. 1 to 3. The same is placed on record. Case to come up for rejoinder and arguments on 16.04.2020 before D.B.

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1566/**2019**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2019	The appeal of Mr. Mehmood Raza presented today by Mr. Zartaj Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR
2-		This case is entrusted to S. Bench for preliminary hearing to be put up there on 23/12/19 CHAIRMAN

D 12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SCANNED KPST Peshawar

Appeal No. 1566 /2019

Mahmood Raza S/O Sultan Muhammad R/o Jamal Abad Colony P.O Mandani Tehsil Tangi District Charsadda.

(Appellant)

VERSUS

Director General (extension) Live Stock & dairy Development Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa and others

(Respondents)

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Appellant

Through

Zartaj Anwar
Advocate High Court
Office FR , 3 Forth Floor
Bilour Plaza Peshawar Cantt.
Cell: 0331-9399185
Email:Zartaj9@yahoo.com

(13)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 1566 /2019

Mahmood Raza S/O Sultan Muhammad R/o Jamal Abad Colony P.O Mandani Tehsil Tangi District Charsadda.

(Appellant)

VERSUS

1. Director General (extension) Live Stock & dairy Development Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa.
2. Director Breed Improvement & Reforms, Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa.
3. Director Cattle Breeding & Dairy Farm, Harichand District Charsadda.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the promotion Orders dated 15.05.2019 and 22.07.2019 which is not communicated, whereas the junior colleagues Class-IV promoted to the post Junior Clerk, against which his departmental Appeal dated 02.08.2019 has not been responded after a lapse of statutory period of 90-days.

Prayer in Appeal: -

On acceptance of this Service Appeal declaring the Appellant fit and eligible to be promoted to the post of junior clerk against the reserve 33% quota for promotion from amongst the Class IV employees on the basis of seniority-cum-fitness, but quit illegally junior colleagues of the Appellant were promoted to the post of Junior Clerk

in violation of rules for promotion, against the reserve quota of Class-IV. The reluctance on the part of the respondents by not promoting the appellant to the post of Junior Clerk is thus to be declared illegal, unlawful, without lawful authority and in violation of the method of recruitment for the post in question and to be declared void ab-initio and need to be set aside. The Appellant has got prior right for the purpose of promotion against reserve quota with all back and consequential benefits.

Or

Any other remedy deemed proper may also be allowed.

Respectfully Submitted:

1. That the Appellant was appointed on 27.06.2005 in the respondent department, as Class IV and posted at Civil Veterinary Hospital, Harichand District Charsadda. **(Copy of appointment orders is attached as annexure A)**

2. That the Appellant is performing his duties at Civil Veterinary Hospital, Harichand District Charsadda for the last 14 years with no complaints what so ever from the superiors till date.

3. That as per law and rules of the respondent department any Govt. Servant working as Class IV having the requisite qualification has the right to be promoted to the post of Junior Clerk from Class IV with 33% reserve quota on the basis of seniority-cum-fitness . **(Copy of educational testimonials are attached as annexure B)**

4. That according to the method of recruitment / promotion in the respondent department all the Class IV having the requisite Qualification may be promoted to the post of Junior Clerk according to the 33 % promotion quota. **(Copy of recruitment/ promotion rules is attached as annexure C)**

5. That the petitioner since their appointment as Class IV performing their duties as with great zeal and devotion and with the passage of time improved his abilities and made himself eligible for promotion according to the rules.

6. That according to the promotion policy, prescribe quota for promotion from the post of Class IV to the post of Junior Clerk, which include all the Class IV employees.

7. That the Appellant since his appointment requested the department for his inter-se seniority through which he can understand his promotional turn according to the prescribed procedure as he has to be promoted on the basis of seniority-cum-fitness but the same is till date not provided to the Appellant with their ulterior and Malafide intention to adjust their own blue eyed ones, which they almost achieved by promoting juniors to the Appellant to the next higher post i.e. Junior Clerk and left behind the present Appellant without any proper and just reason.

8. That the Appellant when not succeeded by getting the information regarding his seniority position and also came to know about the promotion process of the junior colleagues submit applications to the respondent department and when the efforts were fruitless also approached to the RTI (Right to Information) by submitting application vide DD NO.5087 dated 27.09.2019, and also to the respondent department vide DD No.6511 dated 23.09.2019, requesting on the same plea which is also without any result and all the efforts is till date without any success. **(Copy of application to RTI is attached as annexure D)**

9. That cases were prepared and placed before the departmental promotion committee meeting in respect of Class IV employees promotion to the post of junior clerks, where the name of the Appellant was not included but promoted the junior most employees/ colleagues of the Appellant.

10. That the Appellant submitted appeal for promotion but the same is not being the responded and junior most colleagues were consider for promotion and promoted to the post of junior clerks violate the clear rules and laydown procedure. **(Copy of the departmental appeal is attached as annexure E)**

11. That the act and omission of the respondents by not promoting the present Appellant is illegal, unlawful without lawful authority and against the law and facts, hence liable to be set aside inter alia on the following grounds.

GROUNDS:

A. That the Appellant has not been treated in accordance with law, his rights secured and guaranteed under the law and Constitution has been violated.

B. That the respondents are not acting in accordance with law by not promoting the appellant to the post of junior clerk.

C. That the conduct of the respondents is apparently tainted with malice, malafide and bias, similarly favoritism, nepotism & political interference prevailed in the process of promotion, thus the promotion with immediate effect so made is discriminatory.

D. That according to the method of recruitment/Promotion all the Class-IV have the requisite qualification and most important the seniority in the cadre are to be consider for promotion under the 33% reserved quota of promotion to the post of junior clerk which is badly violated in the case of the present appellant as the junior most were promoted. ***(Copies of the their promotion orders are attached as annexure F)***

E. That the appellant has not been treated as per notified gazetted rules by the respondents which deprived the appellant from his due rights of promotion since his fulfillment of the required qualifications and experience.

F. That the state is bound to ensure the elimination of all forms of exploitation and the gradual fulfillment of the fundamental principles. It is also the duties of the state to remove disparity in the income and earning of individuals under Article 37 & 38 of the Constitution.

G. That under Article 25 of the Constitution of the Islamic Republic of Pakistan 1973, all citizen are equal before law, and that no discrimination is permitted in the similarly placed citizens, thus the discrimination meted out to the Appellant in the grant of regularization is illegal, highly discriminatory and not sustainable.

H. That inaction on the part of respondents is adversely affecting the appellant career; hence the proprietary demands that the appellant should be promoted from the initial date of promotion as allowed to the similarly placed colleagues whom been promoted to higher posts.

I. That the Appellant while posted in the respondents department performing their duties with honesty great zeal and devotion to the entire satisfaction of the superiors without any complaint what so ever.

J. That the Superior Courts have repeatedly held that where a point of law is decided by the Superior Courts that cover the cases of all those civil servants who have not litigated than the good governance require that the benefit of such judgment should also be given to those who may not be parties to the litigation instead of compelling them to approach the Service Tribunal or any other forum. Reference can be made to case reported as SCMR 1996Page 1185, 2009 SCMR Page 1, the Appellant being similarly placed is also entitled to similar treatment meted out to their counter parts.

K. That the appellant seeks the permission of this honourable Court to rely on additional grounds at the hearing of this appeal.

It is, therefore, prayed that the service appeal as prayed for in the heading of this Appeal may please be accepted in favour of the Appellant and against the respondents.

Appellant

Through

ZARTAJ ANWAR
Advocate Peshawar

&

IMRAN KHAN
Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No._____/2019

Mahmood Raza S/O Sultan Muhammad R/o Jamal Abad Colony P.O Mandani Tehsil Tangi District Charsadda.

(Appellant)

VERSUS

Director General (extension) Live Stock & dairy Development Bacha Khan Chowk Peshawar, Khyber Pakhtunkhwa and others

(Respondents)

AFFIDAVIT

I, Mahmood Raza S/O Sultan Muhammad R/o Jamal Abad Colony P.O Mandani Tehsil Tangi District Charsadda, do hereby solemnly affirm and declare on oath that the contents of the above service appeal are true and correct and that nothing has been kept back or concealed from this Honourable Court.

18-11-19

KHALID MAHMOOD ADVOCATE PESHAWAR HIGH COURT NOTARY PUBLIC

Deponent

17102-4535801-7

03430943355

Annex A
I-A
7

OFFICE OF THE DEPUTY DIRECTOR, CATTLE BREEDING & DAIRY FARM HARICHAND

19

ORDER

The following persons are appointed on the post noted against their names in Cattle Breeding & Dairy Farm Harichand in BPS-1 @ 4870-55-7500 with regular allowances on contract basis as laid down in Finance Department circular letter no.FD(SO(R)-II)12-1/2002 dated 26/10/2002 from the date of their taking over the charge of the posts:-

1. Mr.Azizullah S/O Zarawar (Cattle Man) Village Main Jan Killi Teh:Tangi District Charsadda.
2. Mr.Ejazullah S/O Sher Mohammad Village Spalmai P.O.Harichand Teh:Tangi District Charsadda Milk Man
3. Mr.Fazli Daood S/O Haji Manzoor Gul, Dakai Teh:Tangi Distt: Charsadda Cattle Man.
4. Mr.Mohammad Raza S/O Sultan Mohammad Village Jamal Abad Colony Teh:Tangi Distt:Charsadda Milk Man.
5. Mr.Nasir-ud-Din S/O Munkam-ud-Din Village Sarkhar Tehsil & Distt:Charsadda Milk Man
6. Mr.Hayatullah S/O Hakimullah Agrey Mian Killi Harichand Teh:Tangi District Charsadda Milk Man
7. Mr.Mian Qaiser Khan S/O Mian Abdur Rauf Harichand Farm colony Teh:Tangi Distt:Charsadda Milk Man

1. The following terms and conditions shall govern their appointment.

a. Theix appointlees should report for duty to the Deputy Director, Cattle Breeding & Dairy Farm Harichand on the following term and condition.

b. Their appointments shall be on contract policy 2002 referred above. Their appointments shall be subject to the verification of Character and Medical fitness by the concerned Medical Superintendent

C. They will be governed by such rules, regulations, orders, acts and ordinances relating to appointments, transfer, leave, efficiency and discipline and conduct as have been/may be prescribed by the Government for the Category of the Government Servants of their status from time to time. The Interpretation to be placed of the rules/regulations in case of any doubt arising is left to the Government.

2. Services shall be liable to termination on the following conditions.

i. At any time without assigning any reason during the period of the contract appointment if his work during thier period was not found satisfactory.

ii. On two months notice by the Government on one side and by then of the other. In case the notice on either side is less than two months, a sum equivalent to two months pay for the period by which the notice falls short of two months will be paid by Government to them or in liev there of two months pay shall be forfieted.

d. By Government as to what constitutes such considerable period being conclusion to continue to remain unfit be reasons of ill health or physical disability to discharge their duties.

e. The date of their jouning the appointment on contract basis or any other factor will have nobearing on the fixation of their seniority.

f. They shall not be entitled to any travelling allowance/daily allowance while joining first appointment.

(Next Page No.2)

Attested

تصدیق کی جاتی ہے کہ مسمی / مسماۃ محمود رضا

ولد / دختر سعد اللہ محمود ساکن خیال آباد کالونی

محلہ ____ گاؤں / شہر ____

تحصیل تگی ضلع چارسدہ

کا / کی رہائشی اور پیدائشی باشندہ ہے اور اس کے والدین / شوہر بھی علاقہ مذکورہ کا رہائشی اور پیدائشی باشندہ ہے۔ میں ان کو ذاتی طور پر جانتا / جانتی ہوں۔

24/2/04

8 20 Annexure-3

S.No. PB 6071

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 30331

PESHAWAR

PROVISIONAL AND DETAILED MARKS CERTIFICATE

INTERMEDIATE (SUPPLY) EXAMINATION, 2008

HUMANITIES (Part-II)

Mahmood Raza Son / Daughter of *Sultan Muhammad*

of *CHARSADDA*

has secured the marks shown against each subject in the H S S C Examination held in the month of *November 2008* as *Private Student*

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	33	–	34	–	67	Sixty-Seven
Urdu	200	35	–	52	–	87	Eighty-Seven
Islamic Education	50	35	–	–	–	35	Thirty-Five
Pakistan Studies	50	–	–	20	–	20	Twenty Only
Islamic History	200	33	–	46	–	79	Seventy-Nine
Islamic Studies	200	40	–	53	–	93	Ninety-Three
Pashto	200	51	–	56	–	107	One Hundred Seven

Total : 1100 | 488-D | Four Hundred Eighty-Eight Only

Remarks :

Checked By :

Date of issue: 21-01-09

Controller of Examinations

Note: Error(s)/Ommission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

ATTESTED

21 8

Serial No: 21160

Roll No: 21025

BOARD OF INTERMEDIATE ... EDUCATION

PESHAWAR

DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination: 2/02

Name: Mahmood Raza Father's Name: Sultan Muhammad

Institution/District: Date of Birth

SUBJECTS	Marks Obtained						
	Max:	P/M	Theory	Practical	Total	P/F	Remarks
English	150	49			52		
Urdu	150	49			79		
Islamyat (Comp)	75	25			48		
Pak. Studies	75	25			33		
Riazi (New)	100	33			49		
General Science	100	33			58		
Is	100	33			65		
Pa	100	33			65		
Total	850				449	C	Passed

Total (in words): Four hundred & Forty Nine.

Prepared by:

Checked by

Dated: 20.11.03.

Controller of Examinations
Board of Intermediate and Secondary
Education, Peshawar.

Note: Errors/Omissions excepted

22

10

DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in the North West Frontier Province having been born in this province.

I was born at Village/Mohalla Jamal abad Colony *Tehsil* Tangi *District* Charsadda

SIGNATURE OF THE APPLICANT

Dated:

Pursuance to the declaration dated *filed by*

Mr: Mahmood Raza *S/O* Sultan Muhammad

Tehsil Tangi *District* Charsadda

I have satisfied myself from my ~~personal~~ knowledge/enquiry through *that the said* *born of parents who are permanent residents of North West Frontier Province having been born within district of*

This: 24 *day of* Feb *20*04

DY: DISTRICT REVENUE OFFICER

COUNTERSIGNED

DISTRICT REVENUE OFFICER

3118
24/2/04

تصدیق کی جاتی ہے کہ مسمی / مسماۃ محمود رضا

ولد / دختر سید علی محمد ساکن جمال آباد تالوکہ

محلہ ــــــــ گاؤں / شہر ــــــــ

تحصیل تنگی ضلع چارسدہ

کا / کی رہائشی اور پیدائشی باشندہ ہے اور اس کے والدین / شوہر بھی علاقہ مذکورہ کا رہائشی اور پیدائشی باشندہ ہے۔ میں ان کو ذاتی طور پر جانتا / جانتی ہوں۔

24/7/04

Tehsil Municipal Administration

11

Annex C

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ESTABLISHMENT AND ADMINISTRATION DEPARTMENT
(ESTABLISHMENT WING)

NOTIFICATION

Peshawar, dated the 6th December 2012.

No SOE.IV(E&AD)/1-35/2012:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous rules, issued in this behalf, the Establishment and Administration Department, in consultation with the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification, which shall be applicable to posts in the Khyber Pakhtunkhwa Civil Secretariat, specified in column 2 of the said Appendix.

APPENDIX

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Superintendent.	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the post of Assistant with atleast five years service as such.

ATTESTED

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
2.	Assistant.	Second Class Bachelor's Degree from a recognized University.	20 to 32 years.	(a) Seventy-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Clerks with atleast five years service as Junior and Senior Clerk. (b) twenty-five per cent by initial recruitment.
3.	Senior Clerk.	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerk with atleast two years service as such.
4.	Junior Clerk.	(i) Matriculation with second division or equivalent qualification from a recognized Board; and (ii) a speed of 30 words per minute in typing.	18 to 30 years	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed S.S.C.Examination; and (b) sixty-seven per cent by initial recruitment. Note: For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc., with reference to the dates of their acquiring the Secondary School Certificate:

ATTESTED

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S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
				Provided that- (a) if two or more officials have acquired the Secondary School Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; (b) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.

CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA.

ATTESTED

14 ANNEX D 26 6511 23/9/19

To,

The Director General,
Department of Livestock & Dairy Development KPK Peshawar,

Subject: - ***INFORMATION REGARDING SENIORITY LIST FOR THE YEAR 2018-2019 UNDER RTI ACT 2013.***

Memo,

It is for your kind information that we have much needed seniority list of (Class –IV) for the year 2018-2019 for some personal use.

It is therefore requested that please provide us the above mention list for the year 2018-2019 under RTI Act 2013 we will be thankful for your favorable consideration.

Yours Obediently,

Wazir Gul, Mahmood Razza,
Shamshad, Muhammad Ijaz
(Class-iv) Govt Dairy Faram
Jamal Abad Harichand

Copy is forwarded to the Information Officer RTI Commission KPK benevolent fund building Saddar Peshawar for information and further necessary action please.

Wazir Gul, Mahmood Razza,
Shamshad, Muhammad Ijaz
(Class-iv) Govt Dairy Faram
Jamal Abad Harichand

Cell # 0346 9338307

ATTESTED

پشاور

بحضور جناب ڈائریکٹر جنرل صاحب محکمہ لائیو سٹاک، ڈیری ڈویلپمنٹ و فشریز خیبر پختونخوا پشاور

E

15

27

مضمون! اپیل

جناب عالی!

خوبانہ گذارش ہے کہ بندہ ڈیری فارم ہوا ہے میں گذشتہ
دو چار ماہ سے ملازمت انجام دے رہا ہے۔ جو کہ تقریباً 5 سال
گزر چکے ہیں۔ یہ کہ حال ہی میں محکمہ کی جانب سے ایک ٹیسٹ لیا گیا تھا۔
بندہ اس ٹیسٹ میں شامل ہوا تھا۔ رولز کے مطابق بندہ کا اس
حق بنتا ہے۔ تو ایسے حالات کی توجہ اس طرف مبذول کرانا
چاہتا ہے کہ بندہ ابھی اپنے حق کا حقدار ہے۔

امید ہے ایسے حالات کی صورت میں ملی مدد کی جائے گی۔
کہ بندہ کی اپیل پر غور فرما کر بندہ کو دعاؤں کا موقع
فراہم کرائیں۔

العارض

مورخہ: 1-8-2019

ڈیوٹی نمبر 5786

date 2-8-019

راقم طالبدار محمود رضا گریڈ 1 ڈیری فارم فرلینڈ۔

تعلیم حاصل کیا: میٹرک، ایف اے۔ دارالعلوم شیڈ

میں وفاق المدارس سے فارغ التحصیل

ATTESTED

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Annexure F

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DIRECTORATE GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT KHYBER PAKHTUNKHWA
Bacha Khan Chowk, Charsadda Road Peshawar. Email: dgldext@yahoo.com
Tel: 091-9210276 9210249, Fax: 091-9210285

No: 2226-51 /154 Promotion Dated Peshawar the 15/5/2019

ORDER.

On recommendation of the Departmental Promotion Committee (DPC) in the meeting dated 30.04.2019, the competent authority is pleased to approve promotion of the following officials (Daftaries & Class-IV) to the post of Junior Clerk (BS-11) of the Livestock and Dairy Development Department (Extension Wing) Khyber Pakhtunkhwa, with immediate effect.

(Daftaries)

S.No	Name of Officials	Promoted to the post of
1	Fayaz Ahmed (Daftari B-05)	Junior Clerk (BPS-11)
2	Asad Iqbal (Daftari B-04)	Junior Clerk (BPS-11)
3	Aftab Anwar (Daftari B-04)	Junior Clerk (BPS-11)
4	Adnan Ahmad (Daftari B-04)	Junior Clerk (BPS-11)
5.	Sareer Khan (Daftari B-04)	Junior Clerk (BPS-11)

(Class-IV)

1	Mr. Zahid Jamal (Lab: Attendant BS-03)	Junior Clerk (BPS-11)
2	Mr. Muhammad Zain-ul-Abiddin (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
3	Mr. Saeed-ul-Hassan (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
4	Mr. Muhammad Ismail (Chowkidar BS-03)	Junior Clerk (BPS-11)
5	Mr. Rahat Shah (Naib Qasid BS-03)	Junior Clerk (BPS-11)
6	Mr. Muhammad Shakeel ur Rehman (Chowkidar BS-03)	Junior Clerk (BPS-11)
7	Mr. Wali Ullah (Behishti BS-03)	Junior Clerk (BPS-11)
8	Mr. Muhammad Asif (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
9	Mr. Dil Jan Khan (Cattle Attendant BS-03)	Junior Clerk (BPS-11)
10	Mr. Muhammad Junaid Shah (Chowkidar BS-03)	Junior Clerk (BPS-11)
11	Mr. Khanullah (Naib Qasid BS-03)	Junior Clerk (BPS-11)

The official will be on probation for a period of one year in terms of Section 6 (2) of the Khyber Pakhtunkhwa Act, 1973 read with rule-15 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and transfer) Rules 1989.

Sd/-
(Dr. SHER MUHAMMAD)
DIRECTOR GENERAL

Copy of even number and date:
Forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director, Cattle Breeding Farm, Haripur.
3. Director, Livestock and Dairy Development, Newly Marged Area, Warsak Road, Peshawar
4. District Director Livestock, Peshawar, Karak, Charsadda and Hangu.
5. District Accounts Officer, Peshawar, Karak, Charsadda, Orakzai and Hangu.
6. Assistant Director, Livestock & Dairy Development, Tribal District, Orakzai.
7. Office Nazir (Local)
8. Officials concerned.

(Dr. ALAM ZEB)
DIRECTOR HEADQUARTERS

17 29

DIRECTORATE GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT KHYBER PAKHTUNKHWA
Bacha Khan Chowk, Charsadda Road Peshawar Email: [illegible]@yahoo.com
Tel: 091-9270276, 9210249 Fax: 091-9210285

No. [illegible]/Estt Promotion Dated Peshawar the 22/4/2019

ORDER

On recommendation of the Departmental Promotion Committee (DPC) of the promotion of the following officials (Daftaries & Class-IV) to the post of Junior Clerk (BS-11) vide Director General, Livestock and Dairy Development Department (Extension Wing) Khyber Pakhtunkhwa, order No. 2226-51 dated 15.05.2019, their further transfer / posting is hereby made as under in the best interest of public service with immediate effect.

S.No.	Name of official	From	To
1	Mr. Faizan Khan Junior Clerk (BPS-11)	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Torgar, against the vacant post of Junior Clerk BS-11
2	Mr. Fayaz Ahmed Junior Clerk (BPS-11)	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar.	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No 1.
3	Mr. Zahid Jamal Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar.	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar against vacant post of Junior Clerk BS-11
4	Mr. Tariq Iqbal Junior Clerk BS-11	Office of the District Director Livestock, Peshawar	Office of the Director, Livestock Experiment Station, Jaba District Mansehra against the vacant post of Junior Clerk BS-11
5	Mr. Muhammad Ismail Junior Clerk BS-11	Office of the District Director Livestock, Peshawar	Office of the District Director Livestock, Peshawar against S.No. 4
6	Mr. Masood Shah Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Nowshera, against the vacant post of Junior Clerk BS-11.
7	Mr. Sajjad Hassan Junior Clerk BS-11	Office of the District Director Livestock, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 6
8	Mr. Syed Muhammad Adnan Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Tank against the vacant post of Junior Clerk BS-11
9	Mr. Rana Shah Junior Clerk BS-11	Office of the Director Cattle Breeding and Dairy Farm, Chandan Nullah	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 8
10	Mr. Romail Mahfooz Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the Director, Livestock Experiment Station, Jaba District Mansehra against the vacant post of Junior Clerk BS-11
11	Mr. Muhammad Shakeeb-ur-Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar Vice S.No. 10
12	Mr. Sajid-ur-Rehman Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Kohat, against the vacant post of Junior Clerk BS-11.
13	Mr. Wali Ullah Junior Clerk BS-11	Office of the District Director Livestock, Hangu	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 12
14	Mr. Asad Ullah Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Karak against the vacant post of Junior Clerk BS-11.
15	Mr. Muhammad Asif Junior Clerk BS-11	Office of the District Director Livestock, Karak	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 14
16	Mr. Faheem Ullah Khan Junior Clerk BS-11	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	Office of the District Director Livestock, Swabi against the vacant post of Junior Clerk BS-11
17	Mr. Muhammad Zain ul Abideen Junior Clerk BS-11	Office of the District Director Livestock, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 16
18	Mr. Asad Iqbal Junior Clerk (BPS-11)	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.
19	Mr. Ahad Ahmad Junior Clerk (BPS-11)	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.

ATTESTED

18 30

20	Mr. Aman Ahmad Junior Clerk (BPS-11)	Office of the Director General Livestock & Dairy Development Khyber Pakhtunkhwa, Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.
21	Mr. Sarwer Khan Junior Clerk (BPS-11)	Office of the Director General Livestock & Dairy Development Khyber Pakhtunkhwa, Peshawar	Office of the Sheep Development officer, sub Division Hassan Khel, Peshawar against the vacant post of Junior Clerk BS-11.
22	Mr. Gul Jan Khan Junior Clerk BS-11	Office of the Director General Livestock & Dairy Development Khyber Pakhtunkhwa, Peshawar	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.
23	Mr. Muhammad Junaid Jan Junior Clerk BS-11	Office of the District Director Livestock Charsadda	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.
24	Mr. Khanullah Junior Clerk BS-11	Office of the Assistant Director Livestock & Dairy Development Tribal District Orakzai	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road Peshawar.

Sd/-
(Dr. SHER MUHAMMAD)
DIRECTOR GENERAL

Copy of even number and date:
Forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Cattle Breeding and Dairy Farm, Harichand.
3. Director, Livestock and Dairy Development Newly Merged Area, Warsak Road, Peshawar.
4. Director, Livestock Experiment Station, Jaba District Mansehra.
5. District Director Livestock, Torgar, Peshawar, Nowshera, Tank, Swabi, Kohat, Karak, Charsadda and Hangu.
6. District Accounts Officer, Torgar, Peshawar, Nowshera, Tank, Swabi, Kohat, Karak, Charsadda, Mansehra and Hangu.
7. Assistant Director, Livestock & Dairy Development, Tribal District, Orakzai.
8. Sheep Development officer, sub Division Hassan Khel, Peshawar
9. Office Nazir (Local).
10. Officials concerned.

(Dr. ALAM ZEB)
DIRECTOR HEADQUARTERS

ATTESTED

Government of Khyber Pakhtunkhwa
District Accounts Office Charsadda
Monthly Salary Statement (July-2019)

19 31

Personal Information of Mr MEHMOOD RAZA d/w/s of SULTAN MUHAMMAD

Personnel Number: 00207593 CNIC: 1710245358017 NTN:

Date of Birth: 26.02.1986 Entry into Govt. Service: 28.06.2005 Length of Service: 14 Years 01 Months 005 Days

Employment Category: Active Temporary

Designation: MILK MAN 80000993-GOVERNMENT OF KHYBER PAKH

DDO Code: CA4145-DEPUTY DIRECTOR CATTLE BREEDING DAI FORM HARICHND CHARSADDA

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: 207593 Interest Applied: Yes **GPF Balance:** 50,180.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 04 Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	15,180.00	1000	House Rent Allowance	1,458.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	338.00	2199	Adhoc Relief Allow @10%	236.00
2211	Adhoc Relief All 2016 10%	1,198.00	2224	Adhoc Relief All 2017 10%	1,518.00
2247	Adhoc Relief All 2018 10%	1,518.00	2264	Adhoc Relief All 2019 10%	1,518.00

Deductions - General

Wage type		Amount	Wage type		Amount
3004	GPF Subscription - Rs 830	-830.00	3501	Benevolent Fund	-300.00
4004	R. Benefits & Death Comp:	-451.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	43,000.00	-1,200.00	26,200.00

Deductions - Income Tax

Payable: 0.00 Recovered till JUL-2019: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): **26,249.00** **Deductions: (Rs.):** **-2,781.00** **Net Pay: (Rs.):** **23,468.00**

Payee Name: MEHMOOD RAZA

Account Number: 03267900093303

Bank Details: HABIB BANK LIMITED, 220326 HARICHAND, CHARSADDA. HARICHAND, CHARSADDA., CHARSADDA

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: CHD Domicile: - Housing Status: No Official

Temp. Address:

City: Email: mehmoodraz93@gmail.com

ATTESTED

POWER OF ATTORNEY

In the Court of KPK Service Tribunal Peshawar

Mahmood Raza }For
}Plaintiff
}Appellant
}Petitioner
}Complainant

SCANNED KPST Peshawar

VERSUS

D.G Live Stock & Others }Defendant
}Respondent
}Accused
}

Appeal/Revision/Suit/Application/Petition/Case No._____of_____

Fixed for_____

I/W, the undersigned, do hereby nominate and appoint

ZARTAJ ANWAR ADVOCATE, my true and lawful attorney, for me in my same and on my behalf to appear at _____ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employee any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at_____

the_____day to_____the year_____

Executant/Executants_____

Accepted subject to the terms regarding fee_____

Zartaj Anwar
Advocate High Courts
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3- 4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cant
Ph.091-5272154 Mobile-0331-9399185
BC-10-9851
CNIC:17301-1610454-5

POWER OF ATTORNEY

In the Court of Khyber Pakhtunkhwa Khan Sonai Tolbul Mahmood Raza }For Defts
}Plaintiff
}Appellant
}Petitioner
}Complainant

SCANNED KPST Peshawar

VERSUS

D.G. and others. }Defendant
}Respondent
}Accused
}

Appeal/Revision/Suit/Application/Petition/Case No._____of_____
Fixed for 23/12/2019

I/W, the undersigned, do hereby nominate and appoint

MUBARAK ZEB ADVOCATE HIGH COURT PESHAWAR my true and lawful attorneys, for me in my same and on my behalf to appear at _____-_____and plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employee any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at_____
the_____day to_____the year_____
Executant/Executants_____
Accepted subject to the terms regarding fee_____

Mubarak

MUBARAK ZEB
Advocates High Court Peshawar
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3, Fourth Floor, Biloûr Plaza, Saddar Road, Peshawar Cantt
Mobile-0334-4274247

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO.1566/2019

Mahmood Raza.....**Appellant**

VERSUS

Director General (Ext), Livestock and Others.....**Respondents**

INDEX

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 1566/ 2019

Mahmood Raza S/O Sultan Muhammad..... Appellant

VERSUS

Director General (Ext), Livestock & Dairy Development Department, Peshawar & Others
..... Respondents

Para-wise comments on behalf of the respondent No. 01, 02 & 03.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no locus standai for filing this Service Appeal.
2. The Appeal is wrong and based on illegal and unlawful presumptions.
3. The Appellant has got no cause of action to file the present Appeal.
4. The Appeal is not maintainable in this present form.

FACTS

1. Correct to the extent that the appellant was appointed as Class-IV on the mentioned date by the office of Director Cattle Breeding and Dairy Farm Harichand, District Charsadda (Respondent No.03).
2. Pertains to record.
3. Correct to the extent that as per service recruitment rules of the Department, 33% reserved quota of Class-IV/Daftari for promotion to Junior Clerk should be filled in as per the eligibility criteria along with seniority, i.e. only candidate with matriculation and having typing speed of 30 words per minute.(Annexure – A & B).
4. Correct to the extent that all the Class-IV/Daftari of the Department having the requisite Qualification along with typing speed of 30 words per minute are eligible for promotion to 33% reserved quota against the post of Junior Clerk, subject to seniority cum fitness.
5. Pertains to record.
6. Correct to the extent that the 33% promotion quota of Class-IV/Daftari to the post of Junior Clerk includes all the Class-IV employees subject to seniority cum fitness.
7. Incorrect. The appellant has never requested for their inter- se seniority list as per official record, Moreover, all the promotions have been made according to the service recruitment rules prescribed for 33% promotion of the Class-IV/Daftari to the post of Junior Clerk. It is pertinent to mention here that Appellant's name was included in the seniority list issued by the office of respondent No. 03, did not appear for the interview on the mentioned date. (Annexure-C).

8. Correct to the extent that the application of the Appellant received was considered by the office of respondents as per rules. Meanwhile, the Appellant filed the instant Appeal in the Khyber Pakhtunkhwa Service Tribunal, Peshawar; therefore, the said documents are hereby annexed in the parawise comments. (Annexure-D).
9. Incorrect. The Appellant was considered to appear for an interview, but he did not appear for the said interview. It is worth to mention here that all the candidates promoted to the post of junior clerk appeared and qualified the typing test. (Annexure-E).
10. Incorrect. As stated above.
11. Incorrect. The act and omission of the respondents are quiet legal and based on service recruitment rules of the Department.

Grounds

A. Incorrect. The action of respondents is based on facts and law and the Appellant's opinion regarding violation of his secured rights is totally biased and based on false presumptions.
B. Incorrect. The respondents have acted according to Law and service recruitment rules prescribed for 33% promotion of the Class-IV/Daftari to the post of Junior Clerk.
C. Incorrect. The conduct of respondents is not tainted with any intension to harm someone, and the unlawful blaming of the Appellant toward respondents is totally based on malafide intension.
D. Incorrect. No violation has been made in case of 33% reserved quota of promotion, According to the service recruitment rules framed for said promotion of Class-IV/Daftari to the post of Junior Clerk, only candidate with matriculation and having typing speed of 30 words per minute were considered for promotion.
E. Incorrect. The Appellant has been dealt as per rules laid down for the said promotion.
F. No Comments.
G. Incorrect. No Violation of Article 25 of the constitution of the Islamic Republic of Pakistan 1973 and discrimination have been made by the respondents and the Appellant has been treated as per rules.
H. Incorrect. The Unlawful actions by the Appellant towards respondents clearly demands for the dismissal of the instant Appeal with cost.
I. As replied above.
J. Correct to the extent that the Appellant's case being not similarly placed to the mentioned SCMR, ordered by the August Supreme Court of Pakistan, Islamabad as the Appellant has been treated according to the Service Recruitment Rules of the Department.
K. The respondents seek permission to raise additional grounds at the times of arguments

It is, therefore, most humbly prayed that the Service Appeal may kindly be dismissed in favor of the respondents against the Appellant with cost.

Respondent No. 01
Director General (Ext) Livestock &
Dairy Development Department
Peshawar

Respondent No. 02
Director Breed Improvement &
Farms, Peshawar

Respondent No.03
Director Cattle Breeding & Dairy
Farm Harichand District
Charsadda

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO. 1566/2019

Mahmood Raza.....**Appellant**

VERSUS

Director General (Ext), Livestock and Others.....**Respondents**

AFFIDAVIT

I, Dr. Shahid Ullah, Veterinary Officer (H)/Farm Manager, Cattle Breeding & Dairy Farm Harichand, District Charsadda, do hereby solemnly affirm on oath that the contents of the parawise comments related to the above mentioned case are true and correct to the best of my knowledge and belief, and that nothing has been concealed from this Honorable Tribunal.

DEPONENT

(Annexure - A) (5)

DIRECTORATE GENERAL (EXTENSION)

LIVESTOCK & DAIRY DEVELOPMENT
KHYBER PAKHTUNKHWA

Bacha Khan Chowk, Charsadda Road Peshawar. Em[illegible]yahoo.comTel: 091-9210276, 9210249, Fax: 091-9210285

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE MEETING FOR PROMOTION OF DAFTARIS / CLASS-IV SERVANTS TO THE POST OF JUNIOR CLERKS HELD ON 30.04.2019 AT 10.00 AM IN THE DIRECTORATE GENERAL (EXTENSION) LIVESTOCK & DAIRY DEVELOPMENT, KHYBER PAKHTUNKHWA, PESHAWAR.

A meeting of the Departmental Promotion Committee was held on 30.04.2019 at 10.00 am in the Directorate General (Extension), Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar. The following committee members attended the meeting.

1. Dr. Sher Muhammad, Director General (Ext)
   L&DD, Khyber Pakhtunkhwa, Peshawar.....Chairman.
2. Mr. Ajmal, Section Officer (Ltig),
   Representative of Administrative Department.....Member.
3. Dr. Sajjad Wazir,
   Assistant Director (HQs), L&DD, Newly Merged Areas, Warsak Road, Peshawar ..... Member
4. Dr. Alam Zeb, Director (HQs)
   L&DD, Khyber Pakhtunkhwa, Peshawar.....Member
5. Dr. Ahmed Kamal, Director Breed Improvement & Farms,
   L&DD, Peshawar.....Member
6. Dr. Ansar, Veterinary Officer (H) Establishment .....Member / Secretary.

The committee was informed that 16-posts of Junior Clerks were lying vacant in Livestock & Dairy Development (Extension), Khyber Pakhtunkhwa due to promotion of the incumbent of the posts to higher posts, and needed to be filled in from amongst the Daftari / Class-IV employees under 33% promotion quota. As per service recruitment rules of the department, the selection was to be made as per the eligibility criteria along with seniority, i.e only a candidate with matriculation and having typing speed of 30 words per minute would be considered for promotion.

In the previous Departmental Promotion Committee meeting held on 27.12.2018, it was decided to scrutinize all the documents of the eligible officials, from the concerned institutions before considering them for promotion to the next higher scale.

Consequently, the committee after examining the SSC Certificate, of the eligible candidates recommends the following officials for promotion to the post of Junior Clerk BPS-11 against the available clear vacant posts in Livestock & Dairy Development (Extension Wing) Khyber Pakhtunkhwa.

Daftari

1	Fayaz Ahmed (Daftari B-04)
2	Asad Iqbal (Daftari B-04)
3	Aftab Anwar (Daftari B-04)
4	Adnan Ahmad (Daftari B-04)
5.	Sareer Khan (Daftari B-04)

Class-IV

1	Mr. Muhammad Shakeeb-ur-Rehman, Chowkidar BPS-03
2	Mr. Muhammad Junaid Jan, Chowkidar BPS-03
3	Mr. Zaib-ul-Abideen, Cattle Attendant BPS-03
4	Mr. Saeed-ul-Hassan, Cattle Attendant BPS-03
5	Mr. Zahid Jamal, Lab Attendant BPS-03
6	Mr. Rahat Shah, Naib Qasid BPS-03
7	Mr. Muhammad Ismail, Chowkidar BPS-03
8	Mr. Khanullah, Naib Qasid BPS-03
9	Mr. Dil Jan Khan, Cattle Attendent BPS-03
10	Mr. Wali Ullah, Behishti BPS-03
11.	Mr. Muhammad Asif, Cattle Attendant BPS-03

Meeting ended with vote of thanks.

(A) (6)

Representative of Administrative Department
(Member)

(Dr. Sajjad Wazir)
Assistant Director, L&DD, Merged Areas
(Member)

(Dr. Alam Zeb)
Director Headquarter
Khyber Pakhtunkhwa
(Member)

(Dr. Ahmad Kamal)
Director Breed Improvement & Farms
L&DD (Ext), Peshawar
(Member)

(Dr. Ansar)
Veterinary Officer (H) Estab
(Member/ Secretary)

(Dr. Sher Muhammad)
Director General
(Chairman)

Annexure - (B)

GOVERNMENT OF NORTH WEST FRONTIER PROVINCE
AGRICULTURE, LIVESTOCK & COOPERATIVE DEPARTMENT

Peshawar dated the 26/06/2007

8126
28/6/07

NOTIFICATION

No.SO(L&DD)AD-E-1(236)/2006/Ext. In pursuance of the provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of this Department's Notification No.SO(L&DD)AD-E-1(236)/2006/Ext., dated 30.9.2003, the Agriculture, Livestock and Cooperatives Department, In consultation with the Establishment and the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions as specified in column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts specified in column 2 of the said Appendix in Extension Wing of Livestock and Dairy Development Department of the North- West Frontier Province.

APPENDIX

PART-I

PROFESSIONAL STAFF

S#	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Appointment (Recruitment and Appointment)
1	2	3	4	5
1.	Director General, Livestock and Dairy Development (Extension Wing), NWFP	----	----	By selection on merit, from amongst the Directors/ Epidemiologist/ Principal Animal Husbandry In-Service Training Institute/ Executive District Officer (Agriculture) with three Years experience as such or having ten years services in BPS-18 and above and registered with Pakistan Veterinary Medical Council.
2	Director/ Epidemiologist/ Principal Animal Husbandry In-Service Training Institute /Executive District Officer. (Agriculture)	----	----	By promotion, on the basis of seniority-cum-fitness from amongst District Livestock Officers / Agency Livestock Officers/ Deputy Directors (Headquarters)/ Senior Veterinary Officers/ Wool Analysts/ Sheep Development Officers/ Livestock Economists having seven years service in BPS-18 or having Twelve years service in BPS-17 and above and registered with Pakistan Veterinary Medical Council.
3.	District Livestock Officer/ Agency Livestock Officer/Deputy Director (Headquarters)/ Senior Veterinary Officer (SVO)/ Training Coordinator Wool Analyst/ Sheep Development Officer	Ph.D. in Veterinary/ Animal Sciences with three years experience as such; OR M.Sc. (Hons)/ M.Phil/ M.S. in relevant subject with Seven Years experience as such; OR Doctor of Veterinary Medicine or B.Sc. (Hons) Animal Husbandry or equivalent qualification with Ten Years experience as such.	30 to 50 years	a) Seventy Five per cent by promotion on the basis of seniority-cum-fitness from amongst Veterinary Officer(Health)/ Laboratory Managers/Semen Distribution Officers Livestock Production Officers/ Sheep Development Inspector/ Cattle Development Inspector/ Instructor/ Field Dairy Assistants/Agrostologists/Livestock Managers/ Female Instructors/ Female Programme Coordinators/ Female Veterinary Officers having five years service as such and registered with the Pakistan Veterinary Medical Council; and b) Twenty Five per cent by initial recruitment.
4.	Livestock Economist	Master's degree in Agriculture Economics or in Economics from a recognized University with Seven years work experience in [illegible]	30 to 40 years	By initial recruitment.

		having a Master's Degree in Agriculture Economics or Economics after DVM/ B.Sc. (Hons) AHT with required experience).		
5.	Veterinary Officer (Health)/ Laboratory Manager/ Semen Distribution Officer	a) Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences from a recognized University; and b) Registered with PVMC.	21 to 35 years	By initial recruitment.
6.	Livestock Production Officer/ Sheep Development Inspector/ Cattle Development Inspector/ Instructor/ Field Dairy Assistant/ Agrostologist/ Livestock Manager.	a) B.Sc. (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the degree of Four Years course of B.Sc. (Hons), Animal Husbandry after F.Sc. Or Doctor of Veterinary Medicine from a recognized University; and b) Registered with PVMC.	21 to 35 years	By initial recruitment.
7.	Female Instructor/ Female Programme Coordinator/ Female Veterinary Officer.	a) B.Sc. (Hons) Animal Husbandry. Preference will be given to candidates who have obtained the degree of Four Years course of B.Sc. (Hons), Animal Husbandry after F.Sc. Or Doctor of Veterinary Medicine from a recognized University; and b) Registered with PVMC.	21 to 35 years	By initial recruitment.
8.	Veterinary Supervisor (Male/ Female)	a. Secondary School Certificate from a recognized Board of Education; b. Two Years Veterinary Assistant Training Certificate from a recognized Training Institute; and c. Second class Bachelors degree from a recognized university.	20 to 32 years	a) Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Veterinary Assistants (Male/ Female) and b) Twenty Five per cent by initial recruitment.
9.	Senior Veterinary Assistant (Male/ Female)	a. Secondary School Certificate from a recognized Board of Education; b. Two Years Veterinary Assistant Training Certificate from a recognized Training Institute; and c. Second class Bachelors degree from a recognized university.	20 to 32 years	a) Seventy- five per cent by promotion, on then basis of Seniority-Cum-fitness, from amongst the Veterinary Assistants (Male/Female) having attended the basis course of six weeks for Veterinary Assistants at AHITI; and b) Twenty Five per cent by initial recruitment.
10.	Veterinary Assistant (Male/ Female)	a. Secondary School Certificate from a recognized Board; and b. Two Years Veterinary Assistant Training Certificate from a recognized Training Institute.	18 to 32 years	By initial recruitment.

PART-II.

MINISTERIAL STAFF

S.#	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Recruitment
1	2	3	4	5
1.	Accounts Officer	---	---	By promotion, on the basis of seniority-cum-fitness, from amongst Superintendents with at least Five Years service as such.
2.	Superintendent	---	---	a) Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Assistants with at least Ten Years service as such; and b) Twenty Five per cent by

				seniority-cum-fitness, from amongst Senior Scale Stenographers with at least Ten Years service as such.
3.	Stenographer	a) Degree from a recognized University. b) A speed of Eighty words per minute in short-hand and Forty words per minute in typing and c) Knowledge of Computer in using MS-Word, MS-Excel & In-page.	20 to 32 years	a) Fifty per cent by initial recruitment; and b) Fifty per cent by promotion on the basis of seniority-cum-fitness, from amongst Steno Typist with at least Ten Years service as such.
4.	Office Assistant	Degree from a recognized University.	20 to 32 years	a) Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from amongst senior clerk/ storekeeper having at least five years service as such and who have passed the Departmental Examination if any, and b) Twenty five per cent by initial recruitment.
5.	Computer Operator	(a) Second Class intermediate certificate in statistics, economics, mathematics, physics or computer science as one of the subjects; and (b) one year diploma or equivalent qualification in Computer or Information Technology from a recognized Board of Technical Education.	18 to 32 years	By initial recruitment.
6.	Steno Typist	a) Intermediate or equivalent qualification from a recognized Board; and b) A speed of Sixty words per minute in short-hand in English and Thirty Five words per minute in typing; and c) Knowledge of Computer in using MS-Word, MS-Excel & In-page.	20 to 32 years	By initial recruitment.
7.	Senior Clerk/ Store Keeper		----	By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks with at least Five Years service as such.
8.	Junior Clerk	a) Secondary School Certificate from a recognized Board; and b) Typing speed of Thirty words per minute.	18 to 30 years	a) Sixty Seven per cent by initial recruitment; and b) Thirty Three per cent by promotion, from amongst the Daftaries, Gestetners, Operators, Naib Qasids and other equivalent posts who possess Secondary School Certificate from a recognized Board and have typing speed of Thirty words per minute.

PART–III

NON-TECHNICAL STAFF

S.No.	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Recruitment
1	2	3	4	5
1.	Farm Manager	B.Sc. (Hons) Agriculture with Animal Science as major subject or equivalent qualification from a recognized University.	21 to 35 years	By initial recruitment.
2.	Mechanical Supervisor (Liquid Nitrogen Plant)	Diploma in Mechanical Engineering from a recognized Polytechnic Institute.	20 to 32 years	By initial recruitment.
3.	Field Assistant	Secondary School Certificate from a recognized Board with Two years prescribed training/ course from a	18 to 32 years	a) By initial recruitment. b) If no suitable candidate is available, then by transfer from any other Government Department

				prescribed for initial recruitment.
4.	Carpenter/ Electrician/ Mechanic/ Blacksmith/Machine Operator.	Middle pass and proficiency in the trade.	18 to 32 years	By initial recruitment.
5.	Driver	Secondary School Certificate from a recognized Board and holder of L.T.V. license.	18 to 32 years	By initial recruitment.
6.	Tube Well Operator.	Preferably literate with proficiency in the trade.	18 to 32 years	By initial recruitment.
7.	Daftari	Middle or equitant qualification.	18 to 32	By promotion, on the seniority-cum-fitness from amongstNaib Qasid /Chowkidar/Sweeper/Behishti/Cycle/Grass Cutter/Attendant/Shepherd/Plough man/Milkman/Mali/Cook, who posses middle pass certificate, or if no suitable qualified person is available then by initial recruitment.
8.	Naib Qasid/ Chowkidar/ Sweeper/ Behishti/ Cycle/ Grass Cutter/ Attendant/ Shepherd/ Ploughman/ Milk Man/ Mali/ Cook.		18to 35 years	By initial recruitment.

SECRETARY TO GOVERNMENT OF NORTH -WEST FRONTIER PROVINCEAGRICULTURE, LIVESTOCK AND COOPERATIVE DEPARTMENT

Endst. No. & Date even.

Copy forwarded for information and necessary action to:

1. Secretary to Government of NWFP, Establishment Department.
2. Secretary to Government of NWFP, Finance Department.
3. Secretary to Government of NWFP, Law, Parliamentary Affairs & Human Rights Department w/r to his letter No. LD/REG.I/(6)/1976/6019-20 dated 18-06-2007.
4. Director, Livestock & Dairy Development, NWFP Peshawar.
5. Manager, Government Printing Press, NWFP Peshawar. He is requested that printed (preferable gazette) copies of the notification as and when published may be furnished to this Department, Finance, Establishment & Law Departments alongwith details of gazette in which it is published.
6. PSO to Chief Minister NWFP.
7. PSO to Chief Secretary NWFP.
8. PS to Minister Agriculture NWFP.
9. PS to Secretary Agriculture.

(NAEEMULLAH)
Section Officer (L&DD)

(Annexure-C) (11)

Attendance Sheet (Junior Clerk) Dated:15/08/2018

Charsadda

S.No	Name	Father's Name	Domicile	Contact No.	Signature
	Nadeem Ali	Ali Gohar	Charsadda	0344-2446770	Nadeem Ali
	Ejazullah	Sher Muhammad	Charsadda	0346-9338307	Ejazullah
	Fasihullah	Shamsul Arifeen	Charsadda	03124066168	Fasihullah
	Waqar Ali	Afzal Khan	Charsadda	03147700075	Waqar Ali
	Yasir ali	Lal Zada	Charsadda	03007005707	Yasir
	Ahmad Ali	Jan. Muslehuddin	Charsadda.	03449011660	[illegible]
	[illegible]	[illegible]	Charsadda	03028[illegible]	[illegible]
	Badar Munir	Hazrat Munir	Charsadda	03468332975	[illegible]
	Ikram ullah	Tahseenullah	Charsadda	03059694659	[illegible]
	ARIF KHAN	Fazal Dayan	Charsadda	0315-9478190	Arifkhan
	Awais Jan	Shahjehan	Charsadda	0316-8933373	[illegible]
	Gohar Ali	Karim Khan	Charsadda	0313 6282825	[illegible]
	MUHAMMAD BILAL	FIDA Muhammad	Charsadda	0301-8820048	[illegible]
	Akhtar	ISRAR Udin	Charsadda	03469371796	[illegible]

(C) (12)

Attendance Sheet (Junior Clerk) Dated:15/08/2018

Charsadda

No.	Name	Father's Name	Domicile	Contact No.	Signature
	WISAL Khan	Karim Kho	charsadda	03029599168	
	Nusw Sherwan	Khushroj Khan	charsadda	03015181842	
	M. Saleem	Mumtaj Gul	Charsadda	03009547063	
	Qaiser alam Khan	Gul Muhammad	Charsadda	03149011164	
	Nowshad	GHAZI shah	charsadda	03120912211	
	Rahat Shah	Sher Muhamd	charsadda	03419345742	
	محمد اسرائیل	محمد اکرم	Charsadda	03059485385	
	M. Junaid Jan	Kalli Jan	Charsadda	03159508815	

(Annexure-D)

13

OFFICE OF THE DIRECTOR CATTLE BREEDING & DAIRY FARM
HARICHAND DISTRICT CHARSADDA PH & FAX #: 091 – 6640187

No. 2430 / dated Harichand, the 12/7 /2018

To

The Director General (Extension)
Livestock & Dairy Development Department
Khyber Pakhtunkhwa Peshawar.

Subject: **LIST OF METRICULATE AN ABOVE QUALIFICATION OF CLASS-IV STAFF IN CATTLE BREEDING & DAIRY FARM HARICHAND.**

Memo:

Kindly refer your office telephonically message on 11/07/2018 on the above noted subject.

The requisite information is as under.

NAME WITH FATHER NAME	DESIGNATION	DATE OF BIRTH	QUALIFICATION	DATE OF ENTRY INTO GOVT SERVICE	DOMICILE	PLACE OF POSTING
MAHMOOD RAZA S/O SULTAN MUHAMMAD	MILK MAN	26/2/1986	METRIC	28/06/2005	CHRSADDA	CB &DF HARICHAND
JANISAR S/O MUHAMMAD GUL	MILK MAN	2/3/1979	METRIC	17/01/2009	CHARSADDA	-DO-
JEHAN ZEB S/O GUL ZAMAN	CHOWKIDAR	18/4/1978	METRIC	17/01/2009	CHARSADDA	-DO-
MUHAMMAD IRSHAD S/O MUHAMMAD IQBAL	MILK MAN	20/11/1986	METRIC	17/01/2009	CHARSADDA	-DO-
SHAHSHAD S/O BAGHISTANT	BEHISHTI	12/8/1974	B.A	17/01/2009	CHARSADDA	-DO-
MR.YOUSAF SHAH S/O MEHRAB SHAH	MILK MAN	11/3/1980	METRIC	17/01/2009	CHARSADDA	-DO-
NIAMAT ULLAH S/O NIAMAT ULLAH	MILK MAN	15/3/1979	(RABITUL MADORIS)	17/01/2009	CHARSADDA	-DO-
MUHAMMAD ALI S/O BACHA KHAN	MILK MAN	1/3/1975	METRIC	21/01/2009	CHARSADDA	-DO-
AKTAR ALI S/O HAKEEM KHAN	CHOWKIDAR	1/4/1975	METRIC	14/2/2009	CHARSADDA	-DO-
RAHAT SHAH S/O SHER MUHAMMAD	NAIB QASID	8/3/1986	F/A	09/03/2011	MARDAN	-DO-
MR.WAZIR GUL S/O NOORAB GUL	MILK MAN	12/3/1990	F/A	12/03/2011	MALAKAND AGENCY	-DO-
MUHAMMAD USMAN S/O SHERZADA	NAIB QASID	5/2/1978	METRIC	25/05/2015	MALAKAND AGENCY	CB & DF HARICHAND
SHAHID KHAN S/O AMIN ULLAH	CATTLE ATTENDANT	10/4/1994	METRIC	25/05/2015	MALAKAND	-DO-
MUHAMMAD SAJID S/O SADIQ SHAH	CHOWKIDAR	1/4/1992	F/A	12/10/2015	MALAKAND AGENCY	-DO-
JAMIL SHAHS/O MUHAMMAD SAID	SWEEPER	1/12/1976	METRIC	01/11/2016	CHARSADDA	-DO-
SAEED ANWAR S/OMAIN SHER	CHOWKIDAR	15/3/1991	METRIC	01/11/2016	MALAKAND AGENCY	-DO-
NASEEM KHAN S/O SIYAR GUL	CATTLE ATTENDANT	14/11/1980	METRIC	01/11/2016	CHARSADDA	-DO-
MUHAMMAD IQBAL S/O SAID WALI	CHOWKIDAR	13/8/1974	METRIC	02/11/2016	CHARSADDA	-DO-

(E) (14)

AZRAT HUSSAIN S/O MOMEN	CATTLE ATTENDANT	15/4/1997	METRIC	02/11/2016	CHARSADDA	-DO-
SEED REHMAN S/O AJAB KHAN	CATTLE ATTENDANT	1/7/1979	METRIC	04/11/2016	MALAKAND AGENCY	-DO-
SHAHRIYAR S/O WAHID GUL	CATTLE ATTENDANT	8/7/1968	F/A	11/02/2017	CHARSADDA	-DO-
SAHIB SHAH S/O USMAN KHAN	CATTLE ATTENDANT	6/7/1986	METRIC F/A	04/08/2014	CHARSADDA	-DO-

for Director,
Cattle Breeding & Dairy
Farm Harichand

Annexure-E/(5)

The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Though the Universities and the department are playing their role, it is not at the level it is supposed to be.

In this regard the following issues are related to Veterinary Education and Research:

- The existing infrastructure of the faculties and laboratories are not sufficient according to the requirements of the degree/certificate programs, thus the graduates are facing difficulties in the field conditions.
- The existing infrastructure of the research establishment is below the required international standards

Muhammad Asif s/o Mashal Khan

CNIC 14203-2045073-9

03405823194

(Annexure-E) (16)

The Livestock Research and Development Department is also striving for the betterment of Livestock sector of the province. However in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Though the Universities and the department are playing their role, it is not at the level it is supposed to be.

In this regard the following issue is related to veterinary Education and Research

The existing infrastructure of the faculties and laboratories are not sufficient according to the requirement of the degree/Certificate programs, thus the graduated are facing difficulties in the field conditions.

The existing infrastructure of the research establishment is below the required international standards.

The Livestock Research and Development Department is also striving for the betterment of Livestock sector of the province.

Muhammad Asif s/o Mashal Khan

CNIC 14203-2045073-9

0340 5823194

120/120

30/minute

Earlier, the Livestock and Dairy Development Department was mandated to provide extension services through its Animal Health work force. Of late, a separate Directorate of Livestock Production Extension and Communication has been established to look after the field extension services. The Directorate of Livestock Production Extension and Communication is also working on human resource management and its development. Due to increased productivity and efficiency of livestock, importance of knowledge in human resource management cannot be underestimated.

Livestock Extension Services and Human Resource Development is constrained by the following issues:

- Inadequate extension services to address the needs of farming communities
- Lack of the use of conventional and modern tools of communication
- Lack of resources to strengthen Farmer Field Schools approach, Livestock Extension through women workers, and need-based trainings

خان اللہ ولد سلطنی بادشاہ
NIC No. 01601-0386314-7

(E) (18)

Earlier, the Livestock and Dairy Development Department was mandated to provide extension services through its Animal Health work force. Of late, a separate Director of Livestock Production Extension and Communication has been established to look after the field extension services. The Director of Livestock Production Extension and Communication is also working on human resource management and its development. Due to increased productivity and efficiency of livestock, importance of knowledge in human resource management cannot be underestimated.

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Lack of use of conventional and modern tools of communication

Lack of resources of strengthen Farmer Field School approach, Livestock Extension through women workers and need-based trainings .

Earlier, the Livestock and Dairy Development Depar was mandated to provide extens services through it Animal Health work force. of late, a separate Director of Livestock Production Extens

خان اللہ ولد سنی بادشاہ

CNIC NO. 21601-0386314-7

Mob: 0333-5014662

Attested

(E)-19

Biotech Services is a privately held innovative company specialized in marketing medical, Radiology, Cardiology, Surgery and OBS/Gyn Equipment. In the years to come we intend to grow with our core business in existing and new markets. Our employees form a service driven team working for the common goal of the company. Their loyalty, qualifications, competence and training are rewarded and motivated by the management. The management actively supports and guides the team through latest information technology in order to direct the team to achieve the corporate goal. Our clients will be benefitted from this as they will recognize and respect our team for its personal and direct service from all levels of the company, up to the owners themselves.

Name: Saeed ul Hassan

Father Name: Baz Gul

(E1) (20)

B : tech services is a privately held innovative held innovative company specialized in marketing medical, R: diology, Cardiology, Surgery and OBS/ Gyn Equipment. In the years to come we intend to grow with o . core business existing and new markets. Our employees form a service driven team working for the c: nmon goal of the company. Their loyalty, qualification, competence and training are rewarded and motivated by the management. The management actively supports and guides the team through latest information technology in order to direct the team to achieve the corporate goal. Our clients will be benefitted from this as they will recognize and respect our team for its personal and direct service from all levels of the company, up to the owners themselves.

Biotech services is a privately held innovative company specialized in marketing medical, radiology,

Name: Saeed Ul Hassan

4 minutes

F/Name: Baz Gul

mobile No. 0313 9951996

120/100

Sign

30/minute

Saeed Hassan

Approved

(E)(2)

The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and solving. Though the Universities and the department are playing their role, it is not at the level it is supposed to be.

In this regard the following issues are related to Veterinary Education and Research:

- The existing infrastructure of the faculties and laboratories are not sufficient according to the requirements of the degree/certificate programs, thus the graduates are facing difficulties in the field conditions.
- The existing infrastructure of the research establishment is below the required international standards

AFTAB ANWAR S/o GOHAR ZAMAN
Contact # 0333-9373735
CNIC # 17301-1673193-5

(E) (22)

The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholders is the key limiting factor in critical issue effective coordination among relevant stakeholders is the key limiting factor in playing their role, it is not at the level it is supposed to be.

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AFTAB ANWAR S/o GOHAR ZAMAN
Contact No. 0333-9373735
CNIC # 17301-1673193-5

(23)

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Mr. Wali ullah S/O Sarbaz Khan

14101-0791113-5

0333-9680102-3

(E) (24)

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Mr. Wali ullah S/o Sardar Kh
14101-0799213-5
0333-9681023

(b) The role of the central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnose endemic, production-limiting diseases using fit-for-purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern technology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fit for purpose and to emphasise targeted diagnostic testing.

(c) Laboratory diagnosis shall be the mandate of the L&DD Department with certain diagnostic responsibilities being assigned to research institutes.

Zahid Jamal
17201-2913899-7
0345-9295491

(E1) (26)

a) The role of central laboratory in testing for the major infectious diseases will be emphasized with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnosis endemic, production limiting diseases using fir for purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fir for purpose and to emphasize targeted diagnostic testing.

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Zahid Jamal
17201-2913899-7
0345-9295491

30/mmcke

120/120

61 (F) (27)

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M. Shakeel-ur-Rehman

0302-5910935

1720141100473-1

(E) (28)

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M. Shakeeb-ur-Rehman
0302-5910935
17201-4100478-1

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(c) Laboratory diagnosis shall be the mandate of the L&DD Department with certain diagnostic responsibilities being assigned to research institutes.

Asad Iqbal

NIC NO 14203-5709847-1

Ph 03469290587

(E) (30)

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b) Laboratory diagnosis shall be the mandate of the l&dd department with certain diagnostic responsibilities being assigned to research institutes

Azad Iqbal

NIC 1420-5709897-1

03469290581.

4 months

120/120

30/month

Approved

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(c) Laboratory diagnosis shall be the mandate of the L&DD Department with certain diagnostic responsibilities being assigned to research institutes.

Dil Jan S/o Dilawar Khan
CNIC = 1120-2043281-5
0343-7031327

66 (E) (32)

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Dil Jan

CNIC = 11201 - 2643281-5

0343-7031327

4 minutes

120/120

30 minute

67 (E) (38)

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(c) Laboratory diagnosis shall be the mandate of the L&D Department with certain diagnostic responsibilities being assigned to research institutes.

Saleem Khan

NIC: 21407-8488487-7

0303-8248422

68 (E) (34)

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Laboratory diagnosis shall be the mandate of the l&d department with certain diagnostic responsibilities being assigned to research institutes.

Saeed Khan
NIC: 21407-8488487-7
0303-8248422

Minutes

30/minute

69 (E) (38)

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Zain-ul-Abideen s/o Attaullah Khan

03329310933

70 (EI) (36)

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Zain-ul-Abideen S/o Attaullah Khan

0332 9310933

4 minutes

29/minute 1.29/120

Attested

(37)

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محمد جنید جمال والد قاضی جمال

شناختی کارڈ نمبر 17101-8655932

(E) (38)

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محمد جنید خان
ڈپٹی کمشنر خان
تحصیل کمشنر خان
0657-9352-9

4 minutes

90 minute

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Faiz Ahmad
0332 9249970

(E) (40)

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role of central laborat

4 minutes

100/100

30/minute

Fayaz Ahmad.

0333 9249970

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Muhammad Ismail
0345-1810151
Junior Clerk

(E) (42)

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Muhammad Sarwar
0345-1810151
Junior Clerk

Minutes

120/180

30/minute

Attested

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Rehat Ali S/o Sheed Muhammad

NIL 16102-0325850-7

Mob. 0341-9345741

Kahigwal

(E) (44)

(A) The role of central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories will be strengthened to diagnosis endemic, production limiting diseases using fir for purpose tests. Rationalization and revamping of diagnostic services will take place to adopt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central and district laboratories, upgrading of labs and skills will be done to ensure that they are fir for purpose and to emphasise targeted diagnostic testing.

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Rehmat Shah

Rehmat Shah S/o Sheer Muhammad

NIC 16102-0325850-7

Mob. 0341-9345742

Rehmat Shah

120/120

78 (48)

DIRECTORATE GENERAL (EXTENSION)
LIVESTOCK & DAIRY DEVELOPMENT, KHYBER PAKHTUNKHWA, PESHAWAR
Tel: 091-9210249/9210276, Fax: 091-9210285, E-mail: dgldext@yahoo.com
Web: www.livestockextkp.gov.pk

No 2034 Dated Peshawar, the 31 / 01/2020

AUTHORITY LETTER

Dr. Shahid Ullah, Veterinary Officer (H)/Farm Manager, Cattle Breeding & Dairy Farm Harichand, District Charsadda, is hereby authorized to submit/pursue Service Appeal No.1566/2019, filed by Mahmood Raza Versus Director General (Ext) Livestock Dairy Development Department Peshawar & Others, on behalf of (Respondents No. 01, 02 & 03).

(DR. SHER MUHAMMAD)
DIRECTOR GENERAL

79

BEFORE THE KHYBER PAKHTUNKWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1566/2019

Mahmood Raza S/O Sultan Muhammad

(Appellant)

VERSUS

Director General (Ext), Livestock & Dairy Development Department, Peshawar and Others

(Respondents)

REJOINDER ON BEHALF OF THE APPELLANT

Respectfully Submitted:

The appellant submit his rejoinder as under:

Preliminary Objections:

1. That the appellant has locus standi and got cause of action to file the instant appeal
2. That the appeal is legal and based real facts.
3. That the appellant has cause of action against the respondents.
4. That the Appeal is maintainable in its present form.

ON FACTS:

1. Contents of Para No 1 needs no reply, as admitted by the respondents..

2. Contents of Para 2 needs no reply..

3. Contents of Para 3 needs no reply as admitted correct by the respondents.

4. Contents of Para 4 needs no reply as admitted correct by the respondents.

5. Contents of Para No 5 need no reply.

80

6. Content of Para No 6 needs no reply as admitted by the respondents.

7. Contents of Para 7 is incorrect and misleading, the appellant has the requisite qualification along with the seniority for promotion, but to adjust their own blue eyed ones, the respondents ignored the case of the appellant and promoted junior to appellant, which clearly shows the Malafide intention of the respondents.

8. Contents of Para 8 needs no reply as admitted correct by the respondents.

9. Contents of Para 9 is incorrect and misleading, the case of the appellant for promotion was not sent to the departmental promotion committee, no interview and no typing test were conducted by respondents department from the appellant.

10. Contents of Para 10 is incorrect, As explained in Para No 9.

11. Contents of Para 11 is Incorrect, As clearly explained in the main appeal.

Grounds

All the grounds are taken are legal and will be argue at the time of hearing.

It is, therefore, Most humbly prayed that the ***Service Appeal***, of the appellant may please be accepted as prayed for.

Appellant

Through

ZARTAJANWAR
Advocate Peshawar

1-9-20

Affidavit

I, do hereby solemnly affirm and declare that the contents of the ***above Rejoinder*** are true and correct and that nothing has been kept back or concealed from this Honourable Court.

Deponent