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## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO \_\_\_\_\_

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1566/2019		18.11.2019	1705.24	80

Muhammad Raza vs Govt of K.P

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*Cy/25/6/24*  
Muharrir Compilation

*[Signature]*  
25/6/24  
Incharge Judicial Branch

(20)

ANX-E



OFFICE OF THE DISTRICT HEALTH OFFICER SWABI

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

No. 18876-75/V.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 Griffith Girls Higher Secondary School Peshawar
3. Dr. Ishfaq Ahmad s/o Shams Khan House No. 01 Education Colony Near Lady Griffith 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.

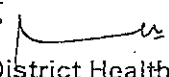
  
District Health Officer  
Swabi

No. 18879-80/V.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-9

S.A No. 1563/2019

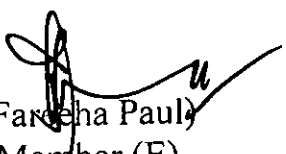
17.05.2024 1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Dr. Noor Badshah, Veterinary Officer for the respondents present.


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.  
SCANNED  
KROT  
Peshawar

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 17<sup>th</sup> day of May, 2024.*

  
(Faraha Paul)  
Member (E)

  
(Rashida Bano)  
Member (J)

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.

SCANNED  
REGISTERED  
PESHAWAR

(Fareeha Paul)  
Member (E)

(Rashida Bano)  
Member (J)

Kaleemullah

09<sup>th</sup> 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.

SCANNED  
REGISTERED  
PESHAWAR

(Muhammad Akbar Khan)  
Member (Executive)

(Kalim Arshad Khan)  
Chairman


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.

SCANNED  
KPST  
Peshawar


  
(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 18.02.2024 before D.B. P.P given to the parties.

  
(Fareeha Paul)  
Member (E)

  
(Rashida Bano)  
Member (J)

SCANNED  
KPST  
Peshawar

Fazle Subhan, P.S


(9)


12<sup>th</sup> 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.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman


\*Mutazem Shah\*

20<sup>th</sup> Sep, 2023

SCANNED  
KPST  
Peshawar

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

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

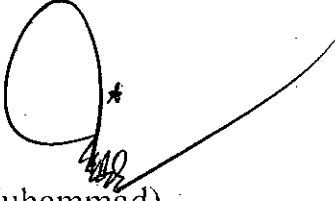
\*Kamranullah\*


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.

SCANNED  
KPST  
Peshawar

  
(Mian Muhammad)  
Member (E)


  
(Kalim Arshad Khan)  
Chairman

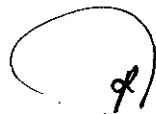
03.04.2023

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)

SCANNED  
KPST  
Peshawar

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)

17<sup>th</sup> 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)

SCANNED  
BT  
Peshawar



7-3-22

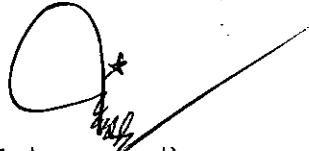
7  
Due to retirement of the Honble  
Chairman the case is adjourned to  
9-5-22

*S. J. Ullah*  
Rector

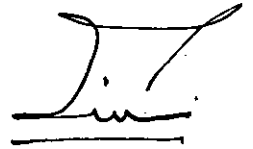
09.05.2022

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)



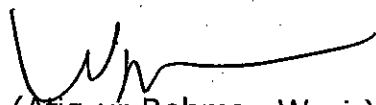
(Salah-ud-Din)  
Member (J)

*[A large diagonal line is drawn across the bottom half of the page.]*

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.

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

  
Chairman

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

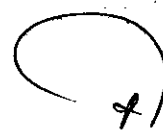
04.08.2021

Appellant present through counsel.

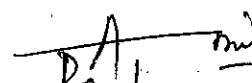
Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Shahid Ullah Form Manager for respondents present.

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

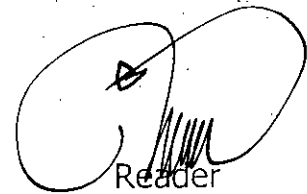
Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 16.07.2020 before D.B.



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

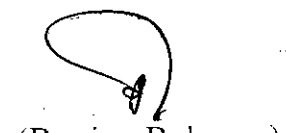
Appellant present in person.

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)



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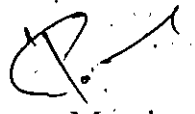
10

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

SCANNED  
NPST  
Peshawar

Appellant Deposited  
- Security & Process Fee  
3/1/20

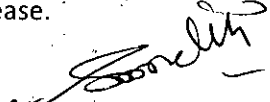
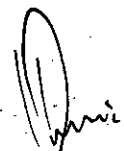
4

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	<p>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.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/12/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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)

**INDEX**

S. No.	Description of Documents	Annex	Page No.
1	Memo of appeal		1-5
2	Affidavit		6
3	Copy of appointment orders is attached	A	7
4	Copy of educational testimonials are attached	B	8-10
5	Copy of recruitment/ promotion rules is attached	C	11-13
6	Copy of application to RTI is attached	D	14
7	Copy of the departmental appeal is attached	E	15
8	Copies of the their promotion orders are attached	F	16-18
9	Other Documents		19
10	Vakalatnama		20

  
Appellant

Through

  
Zartaj Anwar

Advocate High Court  
Office FR , 3 Forth Floor  
Bilour Plaza Peshawar Cantt.  
Cell: 0331-9399185  
Email: [Zartaj9@yahoo.com](mailto:Zartaj9@yahoo.com)

BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1655

Dated 18/11/2019

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.

Filed to May  
Registrar  
18/11/19

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.

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In the second section, the author outlines the various methods used to collect and analyze the data. This includes both primary and secondary data collection techniques. The analysis focuses on identifying trends and patterns over time, which is crucial for making informed decisions.

The third section provides a detailed breakdown of the results. It shows that there has been a significant increase in sales volume, particularly in the online channel. This is attributed to the implementation of the new marketing strategy and the improved user experience on the website.

Finally, the document concludes with a set of recommendations for future actions. It suggests continuing to invest in digital marketing and exploring new product lines to further drive growth. Regular monitoring and reporting will be essential to track the success of these initiatives.

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.**



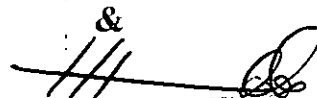
Appellant

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)**

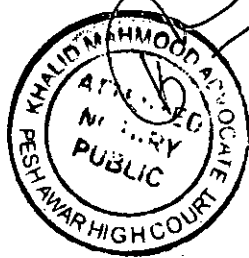
**VERSUS**

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.



**Deponent**

17102-4535801-7

03430943355

ANNEX A  
I-A  
7

19

ORDER

The following persons are appointed on the post noted against their names in Cattle Breeding & Dairy Farm Harichand in BPS-1 @ 1870-55 7500 with regular allowances on contract basis as laid down in Finance Department circular letter no. PD(SOS)-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 Zakaar (Cattle Man) Village Main Jan Killi Teh: Tangi District Charsadda.
2. Mr. Ejazullah S/O Sher Mohammad Village Spaisal P.O. Harichand Teh: Tangi District Charsadda Milk Man
3. Mr. Fazil Hameed S/O Haji Manzoor Gul, Dekai 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. N. Irshad-Din S/O Munim-ud-Din Village Sirkh Teh: Tangi Distt: Charsadda Milk Man.
6. Mr. Hayatullah S/O Hakimullah Agrey Min 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. Their appointees should report for duty to the Deputy Director, Cattle Breeding & Dairy Farm Harichand on the following terms and condition.

b. Their appointments shall be on contract policy 2000 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 their 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 lieu thereof two months pay shall be forfeited.

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

e. The date of their joining the appointment on contract basis or any other factor will have no bearing 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)

app-kut-naw

A

تصدیق کی جاتی ہے کہ مسماة محمود رضا  
ولد/ دختر سید طلال محمد ساکن محلہ آریہ کالونی  
محلہ گاؤں / شہر  
تحصیل نئی 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  
Taha

# 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

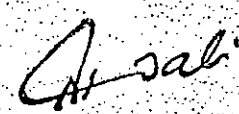
of CHARSADDA

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				Total	Marks in Words
		Part-I		Part-II			
		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
<b>Total : 1100</b>						<b>488-D</b>	<b>Four-Hundred Eighty-Eight Only</b>
Remarks :							

Checked By : 

Date of issue: 21-01-09

  
Controller of Examinations

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

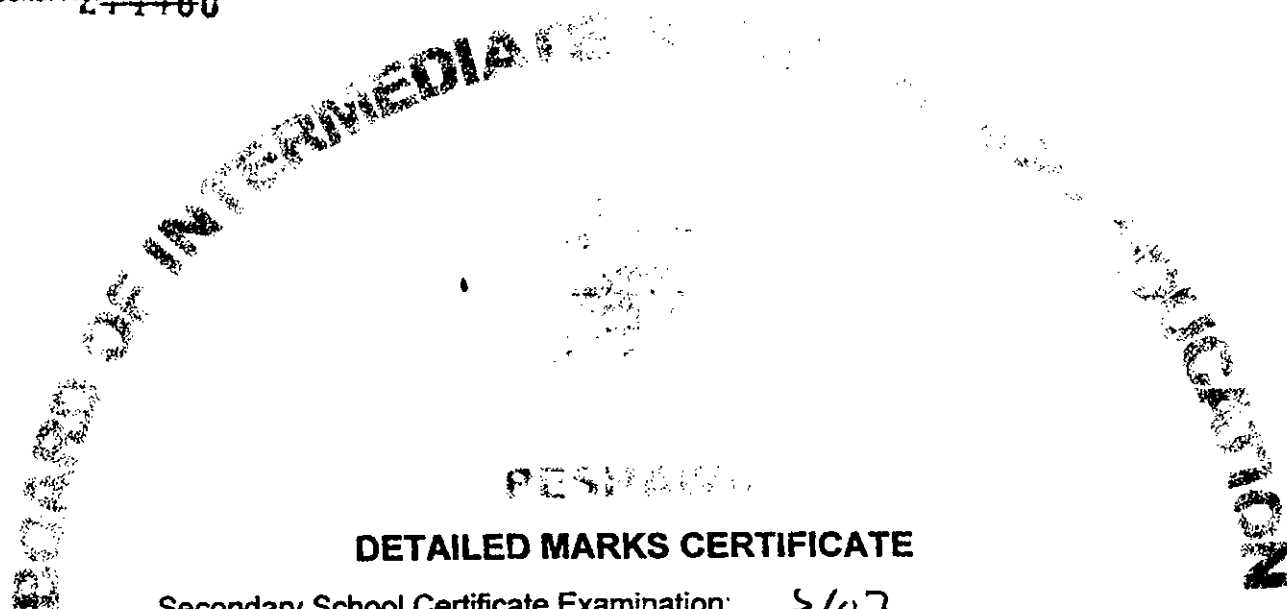
**ATTESTED**



Serial No: 211160

Roll No: 21025

21 8



### DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination: 5/03

Name: Mahmood Raza Father: Sultan Muhammad  
 Institution/District: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

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

Total (in words): Four hundred & forty Nine

Prepared by: [Signature]

Checked by: \_\_\_\_\_

Dated: 20.11.03

[Signature]  
 Controller of Examinations  
 Board of Intermediate and Secondary  
 Education, Peshawar.

Note: Errors/Omissions excepted

[Signature]



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 Tarji District Charsadda

SIGNATURE OF THE APPLICANT

Dated: [Signature]

Pursuance to the declaration dated \_\_\_\_\_ filed by

Mr: Mahmood Raza S/O Gulzar Muhammad  
Tehsil Tarji 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<sup>th</sup> day of Feb 2004

BY: DISTRICT REVENUE OFFICER

COUNTERSIGNED  
DISTRICT REVENUE OFFICER

[Signature]

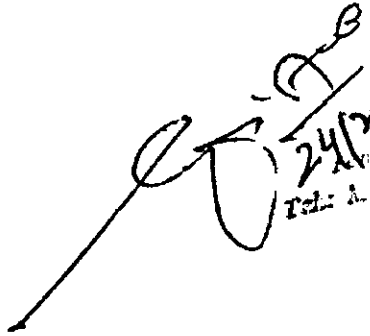
3118  
24/2/04

[Signature]

23A

تقدیق کی جاتی ہے کہ مسمیٰ / مسماۃ محمود رحمن  
ولد / دختر سید علی محمد ساکن محلہ خیال آباد کمالون  
محلہ گاؤں / شہر  
تحصیل تھل ضلع حصار سندھ

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  
Teh: Municipal Admin.

11

Approved C



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

NOTIFICATION

Peshawar, dated the 6<sup>th</sup> 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.

**APPROVED**

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.  <u>Note:</u> 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**

13

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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.
				<p>Provided that-</p> <p>(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;</p> <p>(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.</p>

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA.

**ATTESTED**

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~~APPROVED~~ & D

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6511  
23/9/17

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,

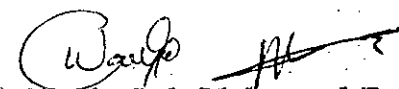
It is for your kind information that we have much needed seniority list of  
(Class -IV) for the year 2018-2019 for some personal use.

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, Muhammed Ijaz  
(Class-iv) Govt Dairy Faram  
Jamal Abad Harichand

Cell # 0346 9338307

ATTESTED

بسم اللہ الرحمن الرحیم  
E  
15

27  
مخون! اپیل  
جناہ

حردبانہ لڑائی ہے کہ بندہ ڈسٹریکٹ میں پرکھتا ہے کھیت  
درجہ ممتاز (حکومت انعام دے رہا ہے۔ جو تقریباً 5 اسدال  
"متر" ہے جس میں 2000 روپے مل رہے ہیں جو کہ لڑائی  
بندہ اس لئے ہے جس میں شامل ہوا تھا۔ روپے 2000 کا اس  
حق بنتا ہے۔ تو ایسا ہے کہ اس طرف سے بندہ کو اس  
چاہتا ہے کہ بندہ اس حق کا حقدار ہے۔

اس لئے ایسا ہے کہ اس میں سے اس کو اس کا حق  
کہ بندہ اس میں غور سے اس کے بندہ کو اس کا حق  
فراموش نہ ہو۔

سید: 8-2-01

اللہ

ڈپٹی مگر 86 ST

date 2-8-01

ایسا ہے کہ اس میں سے اس کو اس کا حق  
کہ بندہ اس میں غور سے اس کے بندہ کو اس کا حق  
فراموش نہ ہو۔  
بسم اللہ الرحمن الرحیم  
میں وفاتی الحاد اس سے خارج التحصیل

ATTESTED





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

10  
 APPROVED → F  
 28

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 Sher Ali (Chowkidar BS-03)	Junior Clerk (BPS-11)
7	Mr. Wali Ullah (Behishtr 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-13 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, Peshawar.
2. Director, Cattle Breeding and Veterinary Health.
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



**DIRECTOR GENERAL (EXTENSION)  
LIVESTOCK & DAIRY DEVELOPMENT, KHYBER PAKHTUNKHWA**  
Bacha Khan Chowk, G-5 Sadda Road, Peshawar. Email: dgs@vsnl.com  
Tel: 091-9210276, 9210249; Fax: 091-9210283

17 29

No. 416 / 2019 Promotion Dated: Peshawar the 27/4 2019

**ORDER**

On recommendation of the Departmental Promotion Committee (DPC) of the promotion of the following officials (Dairies & 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. Faizal Khan Junior Clerk (BS-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 Manshra, 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. Saad ul 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 Wahid 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. Rahat Shah Junior Clerk BS-11	Office of the Director, Cattle Breeding and Dairy Farm, Hanjra, Peshawar	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 8.
10	Mr. Romal 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 Manshra 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. Wahid Ullah Junior Clerk BS-11	Office of the District Director, Livestock, Hanju.	Office of the Director General, Livestock & Dairy Development, Khyber Pakhtunkhwa, Peshawar vice S.No. 12
14	Mr. Saad 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. Waqar 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. Anwar Ahmad 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.

**ATTESTED**

20	Mr. Aman Ahmad Junior Clerk (BS-I)	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. Sarwar Khan Junior Clerk (BS-I)	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-I.
22	Mr. Ehtisham Junior Clerk BS-I	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 Jansid Junior Clerk BS-I	Office of the District Director Livestock & Dairy Development, Charsadda	At the disposal of Director, Merged Area Livestock & Dairy Development, Warsak Road, Peshawar.
24	Mr. Khajullah Junior Clerk BS-I	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, Harichah.
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. Mr. Nazzir (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

**Personnel 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 DAIRY FORM HARICHAND CHARSA  
 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, CHARSA DDA. HARICHAND, CHARSA DDA., CHARSA DDA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:  
 City: CHD Domicile: - Housing Status: No Official  
 Temp. Address:  
 City: Email: mehmoodr93@gmail.com

**ATTESTED**

**POWER OF ATTORNEY**

In the Court of KPK Special Tribunal Peshawar  
Mahmud Raza

} For  
} Plaintiff  
} Appellant  
} Petitioner  
} Complainant

SCANNED  
KPST  
Peshawar

**VERSUS**

DG Use (Pakistani)

} 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 P2 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 employ 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  
**Zartaj Anwar**  
Advocate High Courts

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

[Signature]

[Signature]  
[Signature]

POWER OF ATTORNEY

In the Court of

*Khyber Pakhtunkhwa Shariat Tribunal*  
*Mahmood Raza*

} For *Defendants*  
} 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 employ 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 Zeb*  
**MUBARAK ZEB**

Advocates High Court Peshawar  
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
FR-3, Fourth Floor, Bifour 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

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2.	Affidavit.	--	4
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4.	Service Rules of the Department.	B	7-10
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**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).

*Amir*  
*[Signature]*



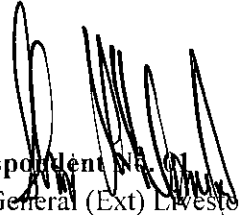
8. Correct to the extent that the application of the Appellant received was considered by the office of respondents as per rules. Meanwhile, the Appellant filed the instant Appeal in the Khyber Pakhtunkhwa Service Tribunal, Peshawar; therefore, the said documents are hereby annexed in the parwise comments. (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.

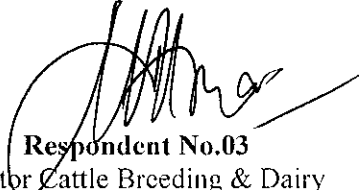
*Approved*  
*[Signature]*



**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.

*Shahid Ullah*  
DEPONENT



**DIRECTORATE GENERAL (EXTENSION)**  
**LIVESTOCK & DAIRY DEVELOPMENT**  
**KHYBER PAKHTUNKHWA**

Bacha Khan Chowk, Charsadda Road Peshawar. Email: [info@l&dd.gov.pk](mailto:info@l&dd.gov.pk) Web: [www.l&dd.gov.pk](http://www.l&dd.gov.pk) Tel: 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 (Lig), 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-03)
2	Asad Iqbal (Daftari B-04)
3	Aftab Anwar (Daftari B-03)
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 Attendant BPS-03
10	Mr. Wali Ullah, Behishti BPS-03
11	Mr. Muhammad Asif, Cattle Attendant BPS-03

Meeting ended with vote of thanks.

*Amir*  
*[Signature]*

(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

Sl#	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Appointment (Recruitment and Appointment)
1.	Director General, Livestock and Dairy Development (Extension Wing), NWF	M.V.Sc. (Hons) Animal Husbandry or M.V.Sc. (Hons) Veterinary Medicine with three years experience as such.	---	By selection on merit from amongst the Directors/ Epidemiologists/ 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)	M.V.Sc. (Hons) Animal Husbandry or M.V.Sc. (Hons) Veterinary Medicine with three years experience as such.	---	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 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	30 to 40 years	By initial recruitment.

*Amir*

		having a Master's Degree in Agriculture Economics or Economics after DVM/ B.Sc. (Hons) AH 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 the basis of Seniority-Cum-fitness, from amongst the Veterinary Assistants (Male/Female) having attended the basis course of six weeks for Veterinary Assistants at AHITJ; 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

*Approved*

				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 thirty 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 Daftris, 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**

1	2	3	4	5
S.N.	Nomenclature of the Post	Qualifications for Appointment by Initial Recruitment	Age Limits	Method of Recruitment
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

*Amended*  
*[Signature]*



10

				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.	Daftar	Middle or equivalent qualification.	18 to 32	By promotion, on the seniority and fitness from amongst Naib Qasid /Chowkidar/Sweeper/Behisht/ Cyce/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/ Behisht/ Cyce/ Grass Cutter/Attendant/ Shepherd/ Ploughman/ Milk Mali/ Mali/ Cook.		18 to 35 years	By initial recruitment.

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

Enclst. 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. ED/REG.I/(6)/1976/60:9-29 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 - 0) (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	0344-2146770	Nadeem ali
	Ejazullah	Sheer Muhammad	Charsadda	0346-9338307	Ejazullah
	Fasihullian	Shamsul Arifan	Charsadda	0324066168	Fasihullian
	Wajid ali	Afzal Khan	Charsadda	0314770005	Wajid ali
	Yasir ali	Lal Zada	Charsadda	03007005707	Yasir ali
	Ahmad Ali Jan	MUSLEH D PIN	Charsadda	03449011660	Ahmad Ali Jan
	Muhammad Ali	Muhammad Ali	Charsadda	0302884158	Muhammad Ali
	Badar Muso	Harret Muso	Charsadda	03468332925	Badar Muso
	Ikramullah	Tahsee hulla	Charsadda	03059694689	Ikramullah
	ARIF KHAN	Fazal Dagan	Charsadda	0315-9478790	Arif Khan
	Awaiz Jan	Shahjehan	Charsadda	0316-9933379	Awaiz Jan
	Gohar ALI	KAVIM KHAN	Charsadda	0313 6282825	Gohar ALI
	MUHAMMADBIZAL	Fida Muhammad	Charsadda	0301-8820048	Muhammad Bizal
	Arif Khan	ISRA RUDIN	Charsadda	03469371796	Arif Khan

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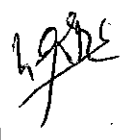


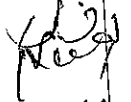

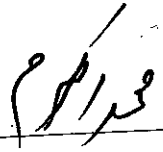


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(Junior Clerk)

Dated: 15/08/2018

Attendance Sheet

Charsadda

No.	Name	Father's Name	Domicile	Contact No.	Signature
	WISAL Khan	Karim Khan	Charsadda	03029591668	
	Musweshwar	Khushroo Khan	Charsadda	03015181842	
	M. Saleem	Mumtaz Gul	Charsadda	03009547063	
	Daisalam Khan	Gul Muhammad	Charsadda	03149011164	
	Nowshad	GHAZI Khan	Charsadda	03120917211	
	Rehmatullah	Sheer Muhammad	Charsadda	03419345742	
	M. Qul		Charsadda	03059485385	
	M. Junaid Jan	Kateijan	Charsadda	03159508815	



(Annexure - B)  
13

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

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

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
AHAMMOOD RAZA S/O SULTAN MUHAMMAD	MILK MAN	26/2/1986	METRIC	28/06/2005	CHARSADDA	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-
SHAH IRSHAD S/O BAGHISTANT	BEHISHITI	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-
EMMAT 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-
AHSTAR 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-
MIR 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-
MIL SHAH S/O MUHAMMAD SAID	SWEEPER	1/12/1976	METRIC	01/11/2016	CHARSADDA	-DO-
SAEED ANWAR S/O MAIN 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 WAZI	CHOWKIDAR	13/8/1974	METRIC	02/11/2016	CHARSADDA	-DO-

(E) 14

AZRA HUSSAIN S/O MOMEN	CATTLE ATTENDANT	15/4/1997	METRIC	02/11/2016	CHARSADDA	-DO-
SABEED 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-
SABIB 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/15

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.

Muhammed Asif s/o Mashal Khan

CNIC 14203-2045073-9

# 03405823194



*(Signature)*

*(Signature)*

(Answer - 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. Although 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.

4, minutes

Muhammed Asif s/o Masood Khan

CNIC 14203-2045073-9

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1200 / 1200



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Answer

[Signature]



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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 سینی باومشاہ

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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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

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فان الله له سنتي بديستك

د/ك/ن/ب. 21601. 0386314-7

Mob: 0333-5014662

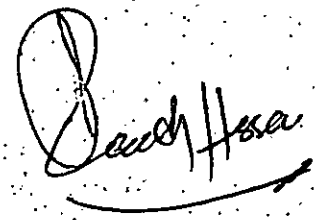
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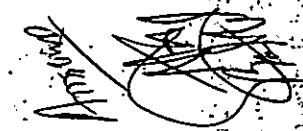
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Biotech Services is a privately held innovative company specialized in marketing medical, Radiology, Cardiology, Surgery and OBS/Gyn Equipment. In the years to come we intend to grow with our core business in existing and new markets. Our employees 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

Now Baz Gul





(E) 20

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 existing and new markets. Our employees form a service driven team working for the common 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 O Hassan

G. M. M. M. M. M. M.

F-1 Name: Baz Gul

mobile no. 0313 9951996

12/1/10

Sign



G. M. M. M. M. M.

Saeed Hassan

Approved  
[Signature]

(E12)

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

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AFTAD ANWAR S/O. GOHAR ZAMAN  
Contact # 0333-9373735  
CNIC # 17301-1673193-5  
*[Signature]*

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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The existing infrastructure of the facilities 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.

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AFTAB ANWAR S/O GOHAR ZAMAN  
Contact No. 0333-9373735  
CNIC # 17201-1673193-5

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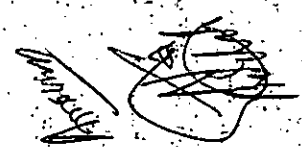
The Livestock Research and Development Department is also striving for the betterment of Livestock Sector of the Province. However, in the current scenario, lack of need-based research and effective coordination among relevant stakeholder is the key limiting factor in critical issue identification and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

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


  
 Mr. Waliullah S/O Sardar Khan

14101-079113-5  
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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.

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

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 Mr. Waliullah S/O Sardar Khan  
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(E) 23

- (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.

*Zafar Iqbal*

Zafar Iqbal

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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.

(c) Laboratory diagnosis shall be the mandate of the L & dd department with certain diagnostic responsibilities being assigned to research institutes the role of central laboratory in testing for the major infectious diseases will be emphasized with district laboratories

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Zahid Jamal  
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61 (E) 27

- (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.
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*M. Shaked-us-Rehman*

*0302-5910935*

*1721-4100472 -*

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M. Shafeeq - US - Rehman

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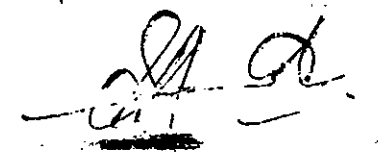
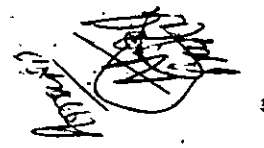
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Asad iqbal

NIC NO 14203-5709847-1

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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



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(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.

*Dil Jan S/O Dilwar Khan*

*CAIC = 11201-2643281-5*

*0343-7031327*

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 confirmation. District laboratories will be strengthened to diagnosis endemic, production limiting diseases for purpose tests. rationalization and revamping of diagnostic services will take place to adopt appropriate modern ethnology. After an audit of the diagnostic capability and capacity of the central district laboratories, upgrading of labs and skills will be done to ensure that they are fir for purpose and to emphasize targeted diagnostic testing.

Laboratory diagnosis shall be the mandate of the L & DD department with certain diagnostic responsibilities being assigned to research institutes the role of central laboratory in testing for the major infectious diseases will

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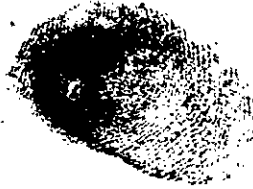
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(c) Laboratory diagnosis shall be the mandate of the L&D Department with certain diagnostic responsibilities being assigned to research institutes.

Sareer  
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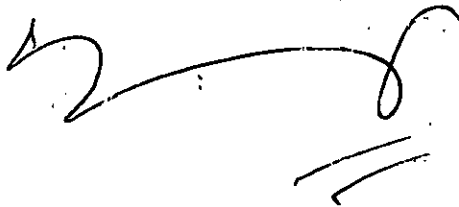
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(b) The role of the central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories 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.

Zain-ul-Abideen s/o Attaullah Khan

03329310933





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(E) 36

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Zain-ul-Abideen s/o Attaullah Khan

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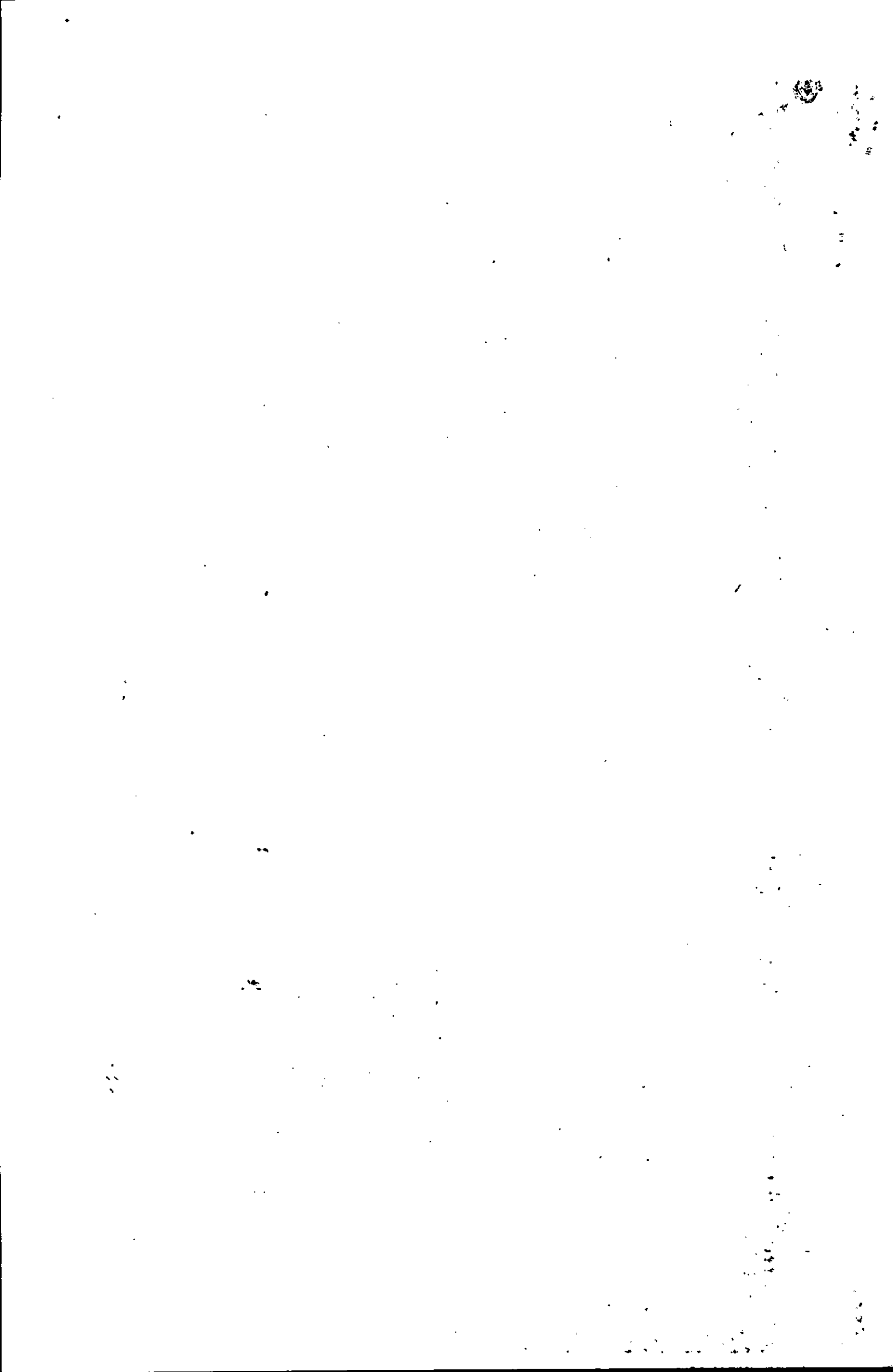
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محمد حیدر خان وائل قانی خان  
17101-86S 7932  
Principal

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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. the role of central

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Fayez Ahmad  
0333 9249970  
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role of central laboratory in testing for the major infectious diseases will be emphasised with laboratories being responsible for collecting and sending samples to the central laboratory for confirmation. 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 opt more appropriate modern ethnology. After an audit of the diagnostic capability and capacity of central and district laboratories, upgrading of labs and skills will be done to ensure that they are fir purpose and to emphasise targeted diagnostic testing. Laboratory diagnosis shall be the mandate of the L&DD Department with certain diagnostic responsibilities being assigned to research institutes. role of central labrat

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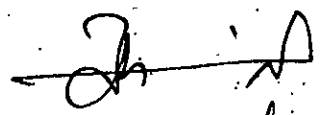
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(b) The role of the central laboratory in testing for the major infectious diseases will be emphasised with district laboratories being responsible for collecting and sending samples to the central laboratory for examination. District laboratories 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&D Department with certain diagnostic responsibilities being assigned to research inst.

  
Muhammad Ismail  
0345-1810151  
Jandera Clerk



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 confirmation. District laboratories will be strengthened to diagnosis endemic, production limiting diseases using 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 fit for purpose and to emphasise targeted diagnostic testing.

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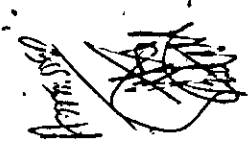
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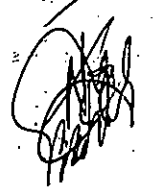
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**DIRECTORATE GENERAL (EXTENSION)  
LIVESTOCK & DAIRY DEVELOPMENT, KHYBER PAKHTUNKHWA,  
PESHAWAR**

Tel: 091-9210249/9210276, Fax: 091-9210285, E-mail: dgiddext@yahoo.com

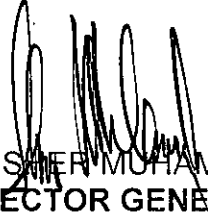
Web: www.livestockextkp.gov.pk

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. SAIFUR MUHAMMAD)  
DIRECTOR GENERAL

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**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.

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

### 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

