


# FORM OF ORDER SHEET

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

Appeal No. 960/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/07/2024	<p>The appeal of Mr. Muhammad Hamza Khan resubmitted today by Mr. Furqan Ahmad Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Hamza Khan received today i.e on 02.07.2024 is incomplete on the following score which is returned to the appellants for completion and resubmission within 15 days.

- ✓1- Appeal has not been flagged/marked with annexures marks.
- ✓2- Annexures of the appeal are unattested.
- ✓3- Memorandum of appeal is not signed by the appellant.
- ✓4- Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal Rules 1974.
- ✓5- Annexures of the appeal are not in sequence.


No. 278 /Inst./2024/KPST,

Dt. 3/7 /2024.

*Furqan*

Mr. Furqan Ahmad Adv.  
High Court Peshawar.

*objection removed*  
*J.*

  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

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

Service Appeal No. 960 /2024

Muhammad Humza Khan..... Appellant

*VERSUS*

Govt. of Khyber Pakhtunkhwa through  
Secretary Information, and another..... Respondents

**I N D E X**

S#	Description of documents.	Annexure	Pages.
1.	Memo of appeal with affidavit		1-4
2.	Stay application with affidavit		5-6
3.	Copy of Degree	A	7 <sup>th</sup>
4.	Copy of appointment order	B	8
5.	Seniority list	C	9-11
6.	Copy of departmental appeal	D	12-13
7.	Letter to department dated 23.10.2020 for inclusion of name of petitioner in sonority list	E	14-15 5/15
8.	Wakalatnama		16

Through Appellant  
  
**Furqan Ahmad**  
Advocate High Court

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

Service Appeal No. 960 /2024

Muhammad Humza Khan S/o Muhammad Shoaib  
R/o University Road, Board Bazar, Peshawar.

..... Appellant

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa through Secretary  
Information, Civil Secretariat, Peshawar.
2. Director General Information, Khyber  
Pakhtunkhwa

....Respondents

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*Appeal u/s 4 of the Khyber  
Pakhtunkhwa Service Tribunal Act,  
1974 of Service Tribunal Act for  
inclusion of name of appellant s in  
seniority list of Naib Qasid (BPS-3) of  
department/ respondent No.2.*

**Respectfully Sheweth:**

**Brief facts of the case are as under:-**

1. That appellant is law abiding citizen of Pakistan and  
educated upto B.S English. (Copy of Degree is  
attached)
2. That on 06.10.2017, appellant was appointed on Naib  
Qasid (BPS-03) in Information & Public Relations

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Department of Khyber Pakhtunkhwa at Peshawar.  
(Copy of Appointment letter is attached)

3. That appellant is presently serving in Public Relations Office of Governor House, Khyber Pakhtunkhwa without any complaint from the corner.
4. That despite of lengthy service, name of appellant is not included in the relevant seniority list maintained by Director General Information and PRS Khyber Pakhtunkhwa/ respondent No.2.
5. That appellant repeatedly requested the respondent No.2 by writing applications to address the grievance of appellant, but respondent is not adding the name of appellant in seniority list nor ready to provide him copy of final seniority list. (Copy of seniority list is attached)
6. That for redressal of his grievances, appellant moved departmental appeal but of no response, hence after lapse of statutory period, present appeal. (Copy of departmental appeal is attached)
7. That action on the part of respondents is illegal on following grounds:-

GROUNDS:

- A. That by not adding the name of appellant in seniority list of relevant employees in the department/ respondent No.2 amounts to treating appellant with **discrimination**.
- B. That non-mentioning the name of appellant in seniority list clearly reflects **malafide** on the part of the respondent No.2.

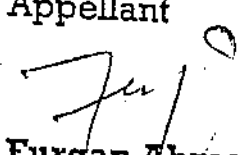
- C. That by not including the name of appellant in seniority list caused prejudice to the rights of the appellant.
- D. That by refusing to add the name of appellant in the seniority list of Nabi Qasid (Class-IV) the respondent No.2 has deprived the appellant from the benefit of seniority.
- E. That any other grounds not specifically taken will be argued at the time of hearing with prior permission of this hon'ble Court.

PRAYER

It is, therefore, most humbly prayed that, on acceptance of this appeal, necessary directions be issued to the respondent No.2 to add/ include the name of appellant in the final seniority list of 2023.

It is, further prayed that the respondents be directed to count the seniority of the appellant from the date his appointment and all the financial benefits (back benefits) may also be granted to the appellant from the date of his appointment.

Any other relief deemed appropriate in the circumstances and not specifically asked for may kindly also be granted.

Appellant  
Through  
  
Furqan Ahmad  
Advocate High Court

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

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

Muhammad Humza Khan..... Appellant

*VERSUS*

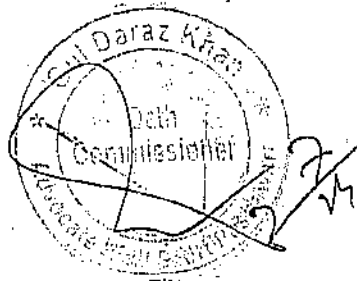
Govt. of Khyber Pakhtunkhwa through  
Secretary <sup>information</sup> and another..... Respondents

**AFFIDAVIT**

I, Muhammad Humza Khan S/o Muhammad Shoaib R/o  
University Road, Board Bazar, Peshawar (Appellant), do  
hereby solemnly affirm and declare on oath that, the contents  
of the accompanying Appeal are true and correct and belief  
and nothing has been concealed

*[Handwritten Signature]*  
DEPONENT

CNIC No. 15302-9823340-9  
Cell No. 0315-9067991



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

In re:  
Service Appeal No. \_\_\_\_\_/2024

Muhammad Humza Khan..... Appellant

*VERSUS*

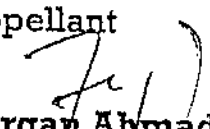
Govt. of Khyber Pakhtunkhwa through  
Secretary Information, and another..... Respondents

APPLICATION ISSUANCE OF DIRECTIONS TO  
THE RESPONDENT NO.2 NOT TO TAKE ANY  
ADVERSE ACTION AGAINST THE APPELLANT  
TILL FINAL DECISION OF TITLED APPEAL.

Respectfully Sheweth:

1. That the above titled appeal is being filed before this hon'ble Tribunal alongwith instant application.
2. That the grounds of main appeal may kindly also be considered as part and parcel of this application.
3. That the appellant is having a good prima-facie case in his favour and is also sanguine about its success.
4. That balance of convenience also lies in faovur of appellant.
5. That if the relief as prayed for in the heading of this application is not granted, the very purpose of accompanying appeal will become infructuous.

It, is therefore, prayed that, on acceptance of this application, the relief as prayed for in the heading of this application may graciously be granted.

Appellant  
Through   
**Furqan Ahmad**  
Advocate High Court



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

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

Muhammad Humza Khan..... Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa through  
Secretary <sup>Information</sup> and another..... Respondents

**AFFIDAVIT**

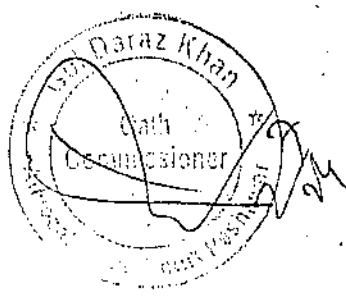
I, Muhammad Humza Khan S/o Muhammad Shoaib R/o University Road, Board Bazar, Peshawar (Appellant), do hereby solemnly affirm and declare on oath that, the contents of the accompanying **Application** are true and correct and belief and nothing has been concealed

*Humza Khan*

DEPONENT

CNIC No.15302-9823340-9

Cell No.0315-9067991



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

In re:  
Service Appeal No. \_\_\_\_\_/2024

Muhammad Humza Khan..... Appellant

*VERSUS*

Govt. of Khyber Pakhtunkhwa through  
Secretary <sup>Information</sup>, and another..... Respondents

**MEMO OF ADDRESSES**

**APPELLANT**

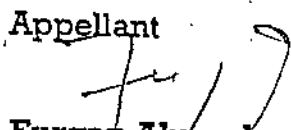
Muhammad Humza Khan S/o Muhammad Shoaib  
R/o University Road, Board Bazar, Peshawar

**RESPONDENTS**

1. Govt. of Khyber Pakhtunkhwa through Secretary  
Information, Civil Secretariat, Peshawar.
2. Director General Information, Khyber Pakhtunkhwa

Through

Appellant

  
Furqan Ahmad  
Advocate High Court

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

# University of Peshawar Pakistan

CS CamScanner

This certifies that

**Muhammad Humza Khan son of Muhammad Shoaib**

having fulfilled all the requirements is hereby admitted to the degree of

**Bachelor Studies in English**

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 8th day of May, 2023.


Roll No: 186667

Session: 2018-2022

Reg. No: 2018-BHAP-3949



217659

  
Registrar

  
Vice Chancellor



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OFFICE OF THE PUBLIC RELATIONS OFFICER TO  
GOVERNOR KHYBER PAKHTUNKHWA,  
GOVERNOR'S HOUSE, PESHAWAR

No.PRO/GH/\_\_\_\_\_  
Dated \_\_\_\_/\_\_\_\_/2017

**OFFICE ORDER**

Consequent upon approval/recommendation of the Departmental Selection Committee (DSC) meeting held on 13.10.2017, the Competent Authority is pleased to order the appointment of Muhammad Humza Khan S/O Muhammad Shoaib R/O Mohallah Badwan Baia, Tehsil Timergara, District Lower Dir against the vacant post of Naib Qasid (BPS-3) in office of the PRO to Governor, Khyber Pakhtunkhwa with immediate effect.

**TERMS AND CONDITIONS ARE AS UNDER:**

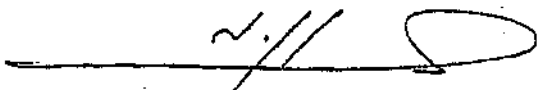
1. He will be governed by such rules and orders as may be issued from time to time by the Government of Khyber Pakhtunkhwa for the category of the Government servants to which he belongs.
2. If he wishes to resign at any time, he will have to submit fifteen days' notice or fifteen days salary in lieu thereof.
3. He may be posted at any station in Khyber Pakhtunkhwa.
4. His appointment to the service shall be subject to the production of Medical Fitness Certificate from the Standing Medical Board.
5. He will be entitled to all the benefits of civil servants according to rules.
6. He should join his post within 30 days of the issuance of this Office Order.
7. He will remain on probation in terms of Rule 6(2) of the Khyber Pakhtunkhwa Civil Servant Act 1973 read with Rule 15(1) & (2) of the Khyber Pakhtunkhwa Government Servant (Appointment, Promotion & Transfer) Rules 1989 for a period of one year extendable for another year.

PRO to Governor Khyber Pakhtunkhwa,  
Governor's House, Peshawar

Endst:No.PRO/GH:/Appointment/1028-34 Dated Peshawar, the 16/10/2017

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. PA to Director General Information & PRs, Khyber Pakhtunkhwa, Peshawar
3. The Section Officer (INF), Information & PRs Department, Govt. of Khyber Pakhtunkhwa, Peshawar.
4. Muhammad Humza Khan S/O Muhammad Shoaib R/O Mohallah Badwan Bala, Tehsil Timergara, District Lower Dir.
5. Bill Clerk.
- ✓ 6. Personal File of the Official.
7. Office Order File.

  
PRO to Governor Khyber Pakhtunkhwa,  
Governor's House, Peshawar



OFFICE OF THE PRESS SECRETARY TO  
GOVERNOR, KHYBER PAKHTUNKHWA  
GOVERNOR'S HOUSE, PESHAWAR

No: PS/GH/ 183  
Dated: 3-10-3/2024

To,

The Director General,  
Information & Public Relations Department,  
Govt. of Khyber Pakhtunkhwa, Peshawar.

Sm  
21/03/24  
RECEIVED  
GOVERNOR'S HOUSE  
PESHAWAR


THROUGH PROPER CHANNEL.

Subject: - REQUEST FOR INCLUSION OF NAME IN THE SENIORITY LIST OF  
CLASS-IV EMPLOYEES OF THE DIRECTORATE GENERAL  
INFORMATION & PRS, KHYBER PAKHTUNKHWA

Enclosed please find herewith a self-explanatory application (in original) on the subject cited above from Mr. Muhammad Humza Khan, Naib Qasid (BS-3) of this office for further necessary action.

The request is genuine, therefore, his name may kindly be included in the seniority list, please.

Encl:- (As Above)

  
Press Secretary to Governor  
Khyber Pakhtunkhwa  
Governor's House, Peshawar

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The Director General,  
Directorate General Information & PRS,  
Khyber Pakhtunkhwa, Peshawar

THROUGH PROPER CHANNEL

Subject: - **REQUEST FOR INCLUSION OF NAME IN THE SENIORITY LIST OF  
CLASS-IV EMPLOYEES OF THE DIRECTORATE GENERAL INFORMATION  
& PRS, KHYBER PAKHTUNKHWA**

R/Sir,

Most respectfully, It is stated that I was appointed as Naib Qasid (BS-03) in the Office PRO to Governor, Khyber Pakhtunkhwa, Governor's House, Peshawar vide office order No. PRO/GH/Appointment/1028-34 dated 16.10.2017.

The Office PRO to Governor, Khyber Pakhtunkhwa, Governor's House, in the subordinate office of the Directorate General Information & PRs, Khyber Pakhtunkhwa but despite regular employee, the name of undersigned has been included in the seniority list.

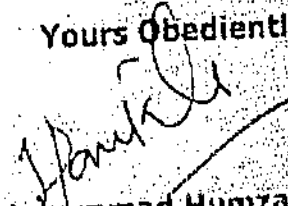
It is, therefore, requested that my name to be included in the seniority list of Class-IV employees of the Directorate General Information & PRs, Khyber Pakhtunkhwa, hence to avail the opportunity of promotion to next grade.

I shall highly be thankful to you for this act of kindness and oblige.

With Thanks,

Yours Obediently,

Dated: 11.03.2024

  
(Muhammad Humza Khan)  
Naib Qasid (BS-3)  
Office of the PRO to Governor  
Khyber Pakhtunkhwa  
Governor's House, Peshawar

**TENTATIVE SENIORITY LIST OF DAFTARI (BS-04) AND CLASS-IV EMPLOYEES (BS-03) OF THE DIRECTORATE GENERAL INFORMATION & P.R.S, KHYBER PAKHTUNKHWA FOR THE YEAR 2023 AS STOOD ON 20-12-2023**

Sr	NAME & DESIGNATION OF GOVT: SERVANT / QUALIFICATION	DATE OF BIRTH	DATE OF ENTRY INTO GOVT: SERVICE	DATE OF CONTINUOUS APPOINTMENT IN THE PRESENT GRADE	DATE OF SUPERANNUATION (60) YEARS	PLACE OF DUTY / DOMICILE
1	2	3	4	5	6	7
1	Wazir Hussain Shah, Naib Qasid	01.07.1964	20.10.1982	20.10.1982	30.06.2024	R/O Abbottabad/Abbottabad
2	Muhammad Zaman, Naib Qasid	10.06.1972	22.09.1994	22.09.1994	09.06.2032	Peshawar/Peshawar
3	Ziarat Gul, Chowkidar	01.07.1965	25.03.1996	01.12.2005	30.06.2025	R/O Swat/Mardan
4	Muhammad Zahid, Chowkidar	01.07.1973	01.06.1998	01.09.2004	30.06.2033	R/O Mardan/Mardan
5	Habib ur Rehman, Mall	01.01.1983	15.09.2007	15.09.2007	31.12.2042	Peshawar/Peshawar
6	Sajid Khan, Cleaner	01.01.1966	24.09.2010	24.09.2010	31.12.2045	Peshawar/Peshawar
7	Abid Ali, Naib Qasid	06.03.1991	14.10.2010	14.10.2010	05.03.2051	Peshawar/Peshawar
8	Muhammad Inran, Naib Qasid	01.01.1981	21.10.2011	21.10.2011	31.12.2041	Peshawar/Peshawar
9	Shaukat Naveed, Sweeper	24.12.1975	16.02.2012	16.02.2012	23.12.2035	ITLA'A Cell/Peshawar
10	Tahseen Ullah, Chowkidar	19.04.1987	16.02.2012	16.02.2012	18/04.2047	FM Peshawar/Nowshera
11	Muhammad Ikram, Chowkidar	07.02.1991	16.02.2012	16.02.2012	06.02.2051	FM Peshawar/Nowshera
12	Mir Baz Ahmad, Naib Qasid	15.12.1981	02.03.2012	02.03.2012	14.12.2041	ITLA'A Cell/Nowshera
13	Mansoor Ali, Naib Qasid	15.04.1986	07.03.2012	07.03.2012	14.04.2046	Peshawar/Karak
14	John Masih, Sweeper	11.11.1980	17.09.2012	17.09.2012	10.11.2040	Peshawar/Peshawar
15	Afsar Ali, Chowkidar	01.01.1978	14.12.2012	14.12.2012	31.12.2038	FM Mardan/Mardan
16	Hamid Ali, Sweeper	31.03.1963	14.12.2012	14.12.2012	30.03.2043	FM Mardan/Mardan
17	Taimur Khan, Daftari	20.03.1991	14.12.2012	14.12.2012	19.03.2051	FM Mardan/Mardan
18	Shakeel, Sweeper	30.06.1980	16.05.2013	16.05.2013	29.06.2040	FM Peshawar/Peshawar
19	Rooh-ul-Amin, Dak Runner	10.02.1983	01.11.2013	01.11.2013	09.02.2043	Peshawar/Charsadda
20	Shahbaz Masih, Sweeper	1987	06.11.2015	06.11.2015	01.07.2047	Peshawar/Peshawar
21	Muhammad Sadaqat, Daftari	27.04.1994	06.11.2015	06.11.2015	26.04.2054	Peshawar/Abbottabad
22	Salman Khan, Camera Cooli	25.01.1996	06.11.2015	06.11.2015	24.01.2056	Peshawar/Charsadda
23	Muhammad Ayaz, Naib Qasid	16.09.1986	20.06.2016	20.06.2016	15.09.2046	Peshawar/Charsadda
24	Aftab Ahmad, Naib Qasid	04.04.1990	05.10.2016	05.10.2016	03.04.2050	Peshawar/Peshawar

S#	NAME & DESIGNATION OF GOVT: SERVANT / QUAUFICATION	DATE OF BIRTH	DATE OF ENTRY INTO GOVT: SERVICE	DATE OF CONTINUOUS APPOINTMENT IN THE PRESENT GRADE	DATE OF SUPERANNUATION (60) YEARS	PLACE OF OUTY / DOMICILE
1			4	5	6	7
25	Naeem Ullah, Dak Runner	25.02.1997	14.09.2017	14.09.2017	24.02.2057	Peshawar/Peshawar
26	Zakir Khan, Chowkidar	25.08.1996	14.09.2017	14.09.2017	24.08.2056	Peshawar/Peshawar
27	Shah Zeb Nawaz, Chowkidar	20.04.1996	28.09.2017	28.09.2017	19.04.2056	RIO Kohat/
28	Waheed Gul, Naib Qasid	10.02.1973	19.10.2017	19.10.2017	09.02.2033	Peshawar/Peshawar
29	Muhammad Yasir, Chowkidar	11.04.1985	27.12.2017	27.12.2017	10.04.2045	RIO Abbottabad/Abbottabad
30	Haroon Sultan, Naib Qasid	03.12.1996	27.12.2017	27.12.2017	02.12.2060	Peshawar/Kohat
31	Noor ur Rehman, Chowkidar	20.12.1980	19.05.2017	17.03.2018	20.12.2040	FM Kohat/Kohat
32	Muhammad Asif, Chowkidar	15.05.1981	19.05.2017	17.03.2018	15.05.2041	FM Swat/Nowshera
33	Sheraz, Naib Qasid	01.03.1982	19.05.2017	17.03.2018	01.03.2042	ITLA'A Cell/Peshawar
34	Zahoor Zaib, Naib Qasid	25.04.1982	15.05.2017	07.03.2018	25.04.2042	FM Swat/Swat
35	Mubashir Hussain Shah, Chowkidar	19.10.1982	19.05.2017	17.03.2018	19.10.2042	FM Abbottabad/Abbottabad
36	Asif Ullah, Chowkidar	18.03.1984	19.05.2017	17.03.2018	18.03.2044	FM Kohat/Kohat
37	Haram Khalid, Naib Qasid	04.10.1985	19.05.2017	17.03.2018	04.10.2045	FM Kohat/Kohat
38	Hasir Ali, Chowkidar	04.04.1992	19.05.2017	17.03.2018	04.04.2052	FM Swat/Swat
39	Muhammad Yasir, Chowkidar	21.12.1994	19.05.2017	17.03.2018	21.12.2054	FM Abbottabad/Abbottabad
40	Tahir Shah, Naib Qasid	11.11.1997	14.02.2018	14.02.2018	10.11.2057	RIO Swat/Swat
41	Jan Alam, Naib Qasid		06.12.2018	06.12.2018		Peshawar/Peshawar
42	Sadiq, Naib Qasid		06.12.2018	06.12.2018		FM Peshawar/
43	Awal Shah, Naib Qasid		06.08.2019	06.08.2019		FM Mardan/
44	Kaleem Ullah, Naib Qasid	16.04.1999	17.09.2019	17.09.2019	15.04.2059	Peshawar/Nowshera
45	Haris Bilal, Naib Qasid	08.01.2000	22.07.2020	22.07.2020	07.01.2060	ITLA'A Cell/Peshawar
46	Sadiq Akbar, Cleaner	18.01.2000	22.07.2020	22.07.2020	17.01.2060	Peshawar/
47	Kamal, Chowkidar	10.03.2001	24.11.2021	24.11.2021	09.03.2061	Peshawar/Peshawar
48	Rhyasat, Naib Qasid	14.03.1993	02.12.2021	02.12.2021	13.03.2053	FM Abbottabad/
49	Haseeb ur Rehman, Naib Qasid	16.01.2000	02.12.2021	02.12.2021	15.01.2060	RIO Mardan/Mardan
50	Adnan Khan, Cleaner	06.04.1998	07.12.2021	07.12.2021	05.04.2058	Peshawar/Peshawar
51	Muhammad Younis, Cleaner	07.01.1997	07.12.2021	07.12.2021	06.01.2057	Peshawar/Peshawar
52	Asmat Ullah, Chowkidar	14.08.2002	13.01.2022	13.01.2022	13.08.2062	RIO D.J.Khan/
53	Farhad Ali, Chowkidar	22.02.1998	13.01.2022	13.01.2022	21.02.2055	PRIO Islamabad/
54	Muhammad Sheraz, Chowkidar	13.04.1998	13.01.2022	13.01.2022	17.04.2058	RIO Malakand/
55	Mantoor Shah	10.04.2001	14.01.2022	14.01.2022	09.04.2061	Peshawar/Peshawar
56	Syed Tariq Hussain Shah, Sweeper		14.01.2022	14.01.2022		PRIO Islamabad/Charsadda



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54	NAME & DESIGNATION OF GOVT: SERVANT / QUALIFICATION	DATE OF BIRTH	DATE OF ENTRY INTO GOVT: SERVICE	DATE OF CONTINUOUS APPOINTMENT IN THE PRESENT GRADE	DATE OF SUPERANNUATION (60) YEARS	PLACE OF DUTY / DOMICILE
1	2	3	4	5	6	7
57	Alamgir		14.02.2022	14.02.2022		Peshawar/Peshawar
58	Ubaid Ullah, Naib Qasid	10.12.1994	04.08.2022	04.08.2022	09.12.2054	Peshawar/Peshawar
59	Muhammad Luqman, Naib Qasid					RIO Kohat/Kohat
60	Muhammad Imran, Naib Qasid					RIO D.I.Khan/D.I.Khan
61	Waseem Akram, Naib Qasid	07.01.2000	13.01.2022	13.01.2022	06.01.2060	FM Mohmand/Mohmand Agency
62	Arshad Khan, Naib Qasid	01.01.1986	13.01.2022	13.01.2022	31.12.2045	Peshawar/Khyber Agency
63	Imtiaz Ali, Naib Qasid	21.04.1994	13.01.2022	13.01.2022	20.04.2054	FM Kurram/Kurram Agency
64	Inayat ur Rasheed, Naib Qasid	14.03.2003	13.01.2022	13.01.2022	13.03.2063	FM Bajaur/Bajaur Agency
65	Azhar Ullah, Naib Qasid	01.01.2000	13.01.2022	13.01.2022	31.12.2059	FM Razmak/North Waziristan
66	Muhammad Abid Shahzad, Sweeper	23.03.1993	13.01.2022	13.01.2022	22.03.2053	Peshawar/Peshawar
67	Shaz Ali, Chowkidar	05.02.1992	13.01.2022	13.01.2022	04.02.2052	FM Mohmand/Mohmand Agency
68	Shandi Gul, Chowkidar	01.01.1989	13.01.2022	13.01.2022	31.12.2048	FM Razmak/North Waziristan
69	Muhammad Waheed, Chowkidar	03.12.1994	13.01.2022	13.01.2022	02.12.2054	FM Bajaur/South Waziristan
70	Tauseef Ilyas, Naib Qasid	13.02.2000	15.12.2023	15.12.2023	12.02.2050	RIO Malakand/Peshawar
71	Muhammad Salman, Cleaner	16.01.2005	15.12.2023	15.12.2023	15.01.2065	HQ Peshawar/Peshawar
72	Vacant (Chowkidar)					FM Swat
73	Vacant (Chowkidar)					RIO Mardan
74	Vacant (Chowkidar)					FM Peshawar
75	Vacant (Naib Qasid)					FM Peshawar
76	Vacant (Naib Qasid)					FM Peshawar
77	Vacant (Naib Qasid)					RIO Bannu

  
DEPUTY DIRECTOR (ADMIN)  
FOR DIRECTOR GENERAL

CS CamScanner



-14-

THE PUBLIC RELATIONS OFFICER TO  
GOVERNOR, KHYBER PAKHTUNKHWA,  
GOVERNOR'S HOUSE, PESHAWAR

No. PRO/GH/ 1394  
Dated Peshawar, the 23/10/2020

To

The Director General,  
Directorate General Information & PRs,  
Khyber Pakhtunkhwa, Peshawar


Through: - PROPER CHANNEL

Subject: - REQUEST FOR INCLUSION OF NAME IN THE  
SENIORITY LIST OF MATRIC PASSED CLASS-IV  
EMPLOYEES OF THE DIRECTORATE GENERAL  
INFORMATION & PRs, KHYBER PAKHTUNKHWA

Enclosed please find herewith an application (in original) on the subject cited above, which is self-explanatory in respect of Muhammad Humza Khan, Naib Qasid (BS-3) working in office of the undersigned.

The applicant has appealed/requested that his name may be included in the seniority list of Matric passed Class-IV employees of the Directorate General Information & PRs, Khyber Pakhtunkhwa, please.

Encl: - (As Above).

  
Press Secretary to Governor,  
Khyber Pakhtunkhwa,  
Governor's House, Peshawar.

D.I. / Dir (PR)  
Pl. Discuss.  
26/10/2020  
23-10-20

To

The Director General,  
Directorate General Information & PRs,  
Khyber Pakhtunkhwa, Peshawar

Through: - PROPER CHANNEL

Subject: - REQUEST FOR INCLUSION OF NAME IN THE SENIORITY LIST OF MATRIC PASSED CLASS-IV EMPLOYEES OF THE DIRECTORATE GENERAL INFORMATION & PRs, KHYBER PAKHTUNKHWA

R/Sir,

Most respectfully, it is stated that I have been appointed as Naib Qasid (BS-03) in your subordinate Office PRO to Governor, Khyber Pakhtunkhwa of the Directorate General Information & PRs, Khyber Pakhtunkhwa vide office order No.PRO/GH/Appointment/1028-34, dated 16.10.2017. I have passed my Matric and F.Sc examinations with 1<sup>st</sup> division (Office Order, Matric & F.Sc certificates are attached for ready reference).

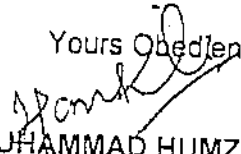
It is, therefore, requested that my name to be included in the seniority list of Matric passed Class-IV employees of the Directorate General Information & PRs, Khyber Pakhtunkhwa, hence to avail the opportunity of promotion for the post of Junior Clerk whenever vacant for Matric passed Class-IV employees quota.

I shall highly be thankful to you for this act of kindness and oblige.

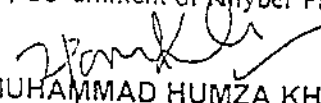
Thanking You,



Yours Obediently,

Dated 15/10/2020

  
(MUHAMMAD HUMZA KHAN)  
NAIB QASID (BS-3)  
Office of the PRO to Governor Khyber  
Pakhtunkhwa,  
Governor's House, Peshawar

Copy forwarded for information to the Section Officer (Establishment), Information & Public Relations Department, Government of Khyber Pakhtunkhwa

  
(MUHAMMAD HUMZA KHAN)  
NAIB QASID (BS-3)  
Office of the PRO to Governor Khyber  
Pakhtunkhwa,

پشاور بار ایسوسی ایشن، خیبر پختونخواہ	48178
ایڈریس: خرقان، عمر	بار کونسل ایسوسی ایشن نمبر: BC 11-1915
رابطہ نمبر: 0331 5743739	
	

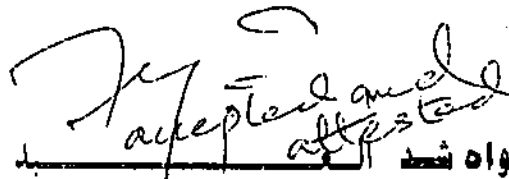
بعدالت جناب: سپرنٹنڈنٹ محکمہ عدالت، پشاور

دعویٰ:	جناب: اسلام آباد / محترمہ رابعہ محمد شہید
حالت نمبر:	عمر عزنہ خان
مدری:	بنام
جرم:	سورہ کلمت اہل بیت علیہم السلام کی تحریف
تھانہ:	سیکشن 295، الفار سینٹر، پشاور

### بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام (پشاور) کیلئے خرقان اعلم ایف ایف کو سبیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور سنسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 21/7/2024

  
استدعا

المقام: لکھنؤ