

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

Service Appeal No. 960/2024

Muhammad Humza Khan.....**PETITIONER**

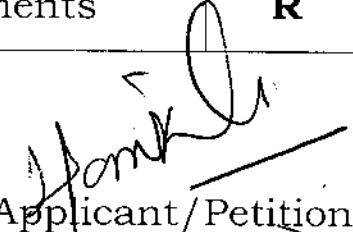
**VERSUS**

Govt. of KPK Through Secretary Information & others.

.....**RESPONDENTS**

**I N D E X**

<b>S.No.</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Application		1
2.	Affidavit		2
3.	Copy of Relevant Documents	<b>R</b>	<b>3-11</b>

  
Applicant/Petitioner

Through

  
**FURQAN AHMAD**  
Advocate High Court

Dated: 21.08.2024

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

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 960/2024

Diary No. 15105

Dated 21/8/24

Muhammad Humza Khan.....**PETITIONER**

**VERSUS**

Govt. of KPK Through Secretary Information & others.

.....**RESPONDENTS**

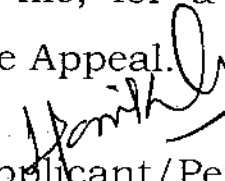
**APPLICATION FOR PLACING ON FILE  
ADDITIONAL DOCUMENTS.**

**Respectfully Sheweth:**

1. That the above titled Service Appeal is pending adjudication before this Hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That the applicant/petitioner wants to place on file certain documents, which are essential for just and fair decision of the titled Service Appeal.

It is, therefore, most humbly prayed that the documents annexed with the instant application may kindly be placed on file, for a just and fair decision of the titled Service Appeal.

Through

  
Applicant/Petitioner

  
**FURQAN AHMAD**  
Advocate High Court

Dated: 21.08.2024

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

Service Appeal No. 960/2024

Muhammad Humza Khan.....**PETITIONER**

**VERSUS**

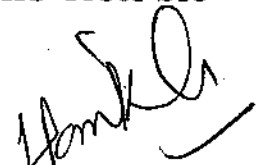
Govt. of KPK Through Secretary Information & others.

.....**RESPONDENTS**

**AFFIDAVIT**

I, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Additional Documents** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



  
Deponent

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**FINAL SENIORITY LIST OF DAFTARI (BS-04) AND CLASS-IV EMPLOYEES (BS-03) OF THE DIRECTORATE GENERAL INFORMATION & PRS, KHYBER PAKHTUNKHWA FOR THE YEAR 2023**

S#	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	RIO Abbottabad/Abbottabad
2	Muhammad Zaman, Naib Qasid	10.06.1972	22.09.1994	22.09.1994	09.05.2032	Peshawar/Peshawar
3	Ziarat Gul, Chowkidar	01.07.1965	25.03.1995	01.12.2005	30.06.2025	RIO Swat/Mardan
4	Muhammad Zahid, Chowkidar	01.07.1973	01.06.1998	01.09.2004	30.06.2033	RIO Mardan/Mardan
5	Habib ur Rehman, Mali	01.01.1983	15.09.2007	15.09.2007	31.12.2042	Peshawar/Peshawar
6	Sajid Khan, Cleaner	01.01.1986	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 Imran, 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	Faimur Khan, Daftari	20.03.1991	14.12.2012	14.12.2012	19.03.2051	FM Mardan/Mardan
17	Shakeel, Sweeper	30.06.1980	16.05.2013	16.05.2013	29.06.2040	FM Peshawar/Peshawar
18	Rooh-ul-Amin, Dak Runner	10.02.1983	01.11.2013	01.11.2013	09.02.2043	Peshawar/Charsadda
19	Shahbaz Masih, Sweeper	1987	06.11.2015	06.11.2015	01.07.2047	Peshawar/Peshawar
20	Muhammad Sadaqat, Daftari	27.04.1994	06.11.2015	06.11.2015	26.04.2054	Peshawar/Abbottabad
21	Salman Khan, Camera Cooli	25.01.1995	06.11.2015	06.11.2015	24.01.2056	Peshawar/Charsadda
22	Muhammad Ayaz, Naib Qasid	16.09.1986	20.06.2016	20.06.2016	15.09.2046	Peshawar/Charsadda
23	Aftab Ahmad, Naib Qasid	04.04.1990	05.10.2016	05.10.2016	03.04.2050	Peshawar/Peshawar

**ATTACHED**

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SN	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
24	Naeem Ullah, Dak Runner	25.02.1997	14.09.2017	14.09.2017	24.02.2057	Peshawar/Peshawar
25	Zakir Khan, Chowkidar	25.08.1996	14.09.2017	14.09.2017	24.08.2056	Peshawar/Peshawar
26	Shah Zeb Nawaz, Chowkidar	20.04.1996	28.09.2017	28.09.2017	19.04.2056	RIO Kohat/
27	Waheed Gul, Naib Qasid	10.02.1973	19.10.2017	19.10.2017	09.02.2033	Peshawar/Peshawar
28	Muhammad Yasir, Chowkidar	11.04.1985	27.12.2017	27.12.2017	10.04.2045	RIO Abbottabad/Abbottabad
29	Haroon Sultan, Naib Qasid	03.12.1996	27.12.2017	27.12.2017	02.12.2060	Peshawar/Kohat
30	Noor ur Rehman, Chowkidar	20.12.1980	19.05.2017	17.03.2018	20.12.2040	FM Kohat/Kohat
31	Muhammad Asif, Chowkidar	15.05.1981	19.05.2017	17.03.2018	15.05.2041	FM Swat/Nowshera
32	Sheraz, Naib Qasid	01.03.1982	19.05.2017	17.03.2018	01.03.2042	ITLA'A Cell/Peshawar
33	Zahoor Zaib, Naib Qasid	25.04.1982	15.05.2017	07.03.2018	25.04.2042	FM Swat/Swat
34	Mubashir Hussain Shah, Chowkidar	19.10.1982	19.05.2017	17.03.2018	19.10.2042	FM Abbottabad/Abbottabad
35	Asif Ullah, Chowkidar	18.03.1984	19.05.2017	17.03.2018	18.03.2044	FM Kohat/Kohat
36	Ikram Khalid, Naib Qasid	04.10.1985	19.05.2017	17.03.2018	04.10.2045	FM Kohat/Kohat
37	Nasir Ali, Chowkidar	04.04.1992	19.05.2017	17.03.2018	04.04.2052	FM Swat/Swat
38	Muhammad Yasir, Chowkidar	21.12.1994	19.05.2017	17.03.2018	21.12.2054	FM Abbottabad/Abbottabad
39	Tahir Shah, Naib Qasid	11.11.1997	14.02.2018	14.02.2018	10.11.2057	RIO Swat/Swat
40	Jan Alam, Naib Qasid		06.12.2018	06.12.2018		Peshawar/Peshawar
41	Sadiq, Naib Qasid		06.12.2018	06.12.2018		FM Peshawar/
42	Awal Shah, Naib Qasid		06.08.2019	06.08.2019		FM Mardan/
43	Kaleem Ullah, Naib Qasid	16.04.1999	17.09.2019	17.09.2019	15.04.2059	Peshawar/Nowshera
44	Haris Bilal, Naib Qasid	08.01.2000	22.07.2020	22.07.2020	07.01.2060	ITLA'A Cell/Peshawar
45	Sadiq Akbar, Cleaner	18.01.2000	22.07.2020	22.07.2020	17.01.2060	Peshawar/
46	Kamal, Chowkidar	10.03.2001	24.11.2021	24.11.2021	09.03.2061	Peshawar/Peshawar
47	Riyasat, Naib Qasid	14.03.1993	02.12.2021	02.12.2021	13.03.2053	FM Abbottabad/
48	Haseeb ur Rehman, Naib Qasid	16.01.2000	02.12.2021	02.12.2021	15.01.2060	RIO Mardan/Mardan
49	Adnan Khan, Cleaner	05.04.1998	07.12.2021	07.12.2021	05.04.2058	Peshawar/Peshawar
50	Muhammad Younis, Cleaner	07.01.1997	07.12.2021	07.12.2021	06.01.2057	Peshawar/Peshawar
51	Asmat Ullah, Chowkidar	14.08.2002	13.01.2022	13.01.2022	13.08.2062	RIO D.I.Khan/
52	Farhad Ali, Chowkidar	22.02.1998	13.01.2022	13.01.2022	21.02.2058	PRIO Islamabad/
53	Muhammad Sheraz, Chowkidar	13.04.1998	13.01.2022	13.01.2022	12.04.2058	RIO Malakand/
54	Manzoor Shah	10.04.2001	14.01.2022	14.01.2022	09.04.2061	Peshawar/Peshawar
55	Syed Tariq Hussain Shah, Sweeper		14.01.2022	14.01.2022		PRIO Islamabad/Charsadda

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Sl#	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
	2	3	4	5	6	7
1				14.02.2022		Peshawar/Peshawar
56	Alamgir	10.12.1994	04.08.2022	04.08.2022	09.12.2054	Peshawar/Peshawar
57	Ubaid Ullah, Naib Qasid					RIO Kohat/Kohat
58	Muhammad Luqman, Naib Qasid					RIO D.I.Khan/D.I.Khan
59	Muhammad Imran, Naib Qasid			13.01.2022	06.01.2050	FM Mohmand/Mohmand Agency
60	Waseem Akram, Naib Qasid	07.01.2000	13.01.2022	13.01.2022	31.12.2045	Peshawar/Khyber Agency
61	Arshad Khan, Naib Qasid	01.01.1986	13.01.2022	13.01.2022	20.04.2054	FM Kurram/Kurram Agency
62	Imtiaz Ali, Naib Qasid	21.04.1994	13.01.2022	13.01.2022	13.03.2053	FM Bajaur/Bajaur Agency
63	Inayat ur Rasheed, Naib Qasid	14.03.2003	13.01.2022	13.01.2022	31.12.2059	FM Razmak/North Waziristan
64	Azhar Ullah, Naib Qasid	01.01.2000	13.01.2022	13.01.2022	22.03.2053	Peshawar/Peshawar
65	Muhammad Abid Shahzad, Sweeper	23.03.1993	13.01.2022	13.01.2022	04.02.2052	FM Mohmand/Mohmand Agency
65	Shaz Ali, Chowkidar	05.02.1992	13.01.2022	13.01.2022	31.12.2043	FM Razmak/North Waziristan
67	Shandi Gul, Chowkidar	01.01.1989	13.01.2022	13.01.2022	02.12.2054	FM Bajaur/South Waziristan
68	Muhammad Waheed, Chowkidar	03.12.1994	13.01.2022	13.01.2022		FM Wana/
69	Azeem Ullah, Naib Qasid		13.01.2022	13.01.2022		FM Wana/
70	Muhammad Waheed, Chowkidar		13.01.2022	15.12.2023	12.02.2060	RIO Malakand/Peshawar
71	Tauseef Ilyas, Naib Qasid	13.02.2000	15.12.2023	15.12.2023	15.01.2065	HQ Peshawar/Peshawar
72	Muhammad Salman, Cleaner	16.01.2005	15.12.2023			FM Swat
73	Vacant (Chowkidar)					RIO Mardan
74	Vacant (Chowkidar)					FM Peshawar
75	Vacant (Chowkidar)					FM Peshawar
76	Vacant (Naib Qasid)					FM Peshawar
77	Vacant (Naib Qasid)					RIO Bannu
78	Vacant (Naib Qasid)					FM Mardan
79	Vacant (Sweeper)					

ASSISTANT DIRECTOR (ADMIN)  
FOR DIRECTOR GENERAL

REGISTERED

بخدمت جناب سیکرٹری اطلاعات و تعلقات عامہ خیبر پختونخوا ایشاور

عنوان: درخواست برائے بھرتی کلاس فور کوٹہ

جناب عالی!

مؤدبانہ گزارش ہے۔ کہ فدوی محمد شعیب مورخہ 24/9/2017ء کو 60 سالہ پر ریٹائر ہو رہا ہے۔ فدوی نے محکمہ اطلاعات میں تقریباً 35 سال نہایت ایمانداری، محنت اور جانفشانی سے خدمات سرانجام دی ہیں۔ فدوی ایک غریب شخص ہے اور آمدنی کا کوئی ذریعہ بھی نہیں ہے۔ مزید یہ کہ فدوی کا بیٹا محمد حمزہ خان میٹرک پاس ہے۔ (میٹرک سرٹیفیکیٹ کی فوٹو کاپی منسلک ہیں) لہذا آپ صاحبان سے نہایت مؤدبانہ التماس ہے کہ فدوی کے بیٹے محمد حمزہ خان کو میری جگہ پر کلاس فور کوٹے کے تحت بھرتی فرما کر مشکور فرماویں۔

عین نوازش ہوگی۔

العارض

محمد شعیب نائیب قاصد

آمن آباد پریس سیکرٹری ٹو گورنر خیبر پختونخوا ایشاور

مورخہ 31/08/2017

DD(A)

As dissected fl

05-9-17

AD/CAS/SE

For MK as directed fl

Shd  
07/9/17

07/9/17

Diary No. 3167  
Date 5-9-17  
Government Information  
Khyber Pakhtunkhwa Peshawar

ATTN



DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR

No.INF/Estt:/16-1/ 2875  
Dated Peshawar the 26/9/2016

✓ To

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

Subject: -

**APPLICATION FOR RECRUITMENT UNDER THE QUOTA RESERVED  
FOR APPOINTMENT OF CHILDREN OF RETIRING GOVT SERVANTS  
ON SUPERANNUATION**

I am directed to refer to the subject noted above and to enclose herewith an application of Muhammad Shoaib, Naib Qasid of your office submitted/addressed to the Secretary Information and PRs and to state that the worthy secretary has marked the same to the Director Information with the remarks on face of the application "for n/action as per rules" (F/A).

As the Section Officer (Inf), Information & PRs Department, Govt: of Khyber Pakhtunkhwa's vide letter No.SO(INF)/Death Pension Cases of Directorate of Inf:/2015 dated 18.08.2017 has already declared you as appointing authority under Sub-rules (4) of Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules-1989.(F/B), you may therefore, dispose of the application/request of the ex-employee in light of the Establishment Department's (the then S&GAD) instructions issued vide No.SOR-1(S&GAD)4-1/80(Vol-III) dated 23.5.2000 wherein a quota @25% has been reserved for recruitment a child of the retiring civil servant on superannuation (F/C), please.

**Encl:- (As Above).**

  
ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR

Endst:No.INF/Estt:/16/1/ \_\_\_\_\_

Dated Peshawar, the    /    /2017

Copy forwarded to the Section Officer (Inf), Information & PRs Department, Govt: of Khyber Pakhtunkhwa for information, please.

ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR

ATTS



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(10)

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

**WORKING PAPERS.**

Subject:- **APPOINTMENT OF CHILD OF RETIRING CLASS-IV GOVERNMENT  
SERVANT ON SUPERANNUATION.**

The following post is lying vacant in the office of the PRO to Governor Khyber Pakhtunkhwa, Governor's House, Peshawar.

S.NO.	Name of post	No. of post	Place	Remarks
1.	Naib Qasid (BPS-3)	1	Peshawar	By initial recruitment.

Mr. Muhammad Shoaib, working as Naib Qasid (BPS-4) in the office of the PRO to Governor, Khyber Pakhtunkhwa, Governor's House, Peshawar retired from Govt. service on superannuation w.e.f 24.9.2017 (A.N.). As a result he submitted an application for the appointment of his son Muhammad Hamza Khan for the post of Naib Qasid(Annexure-1). As per policy instructions issued vide letter No.SOR-1(S&GAD)4-1/80(Vol:III) dated 23/5/2000 (Annexure-II) a quota of 25% falling to the share of initial recruitment in BPS-1 to BPS-4 shall be reserved for appointment for one of the children of retiring civil servant on superannuation/invalidation provided the child possesses the qualification prescribed for the post provided further that the appointment be made subject to availability of the vacancy.

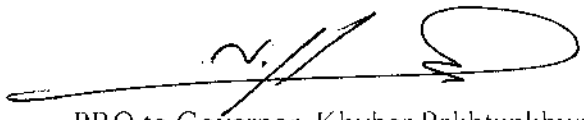
At present there are 3 sanctioned posts of the Class-IV Employees in office of the PRO to Governor, Khyber Pakhtunkhwa which had already been filled by initial recruitment. Due to retirement of Muhammad Shoaib, ex-Naib Qasid, the post of Naib Qasid BPS-3 is lying vacant. Out of three (3) sanctioned posts one (1) post is available under the Quota of Children of Retiring Government servant on Superannuation/invalidation to be filled under the said quota (annex: III)

The statement below shows the No. of application of the child of the retired civil servant on superannuation of the office of the PRO to Governor, Khyber Pakhtunkhwa, Governor's House, Peshawar till date.

S.No.	Name of applicant	Posts applied for	Qualification
1.	Muhammad Hamza Khan son of Muhammad Shoaib, ex-Naib Qasid.	Naib Qasid	Matric

Now the case with regard to appointment against the superannuation of civil servant employee's son quota, invalidation and retiring class-IV Government Servant on Superannuation is placed before Departmental Selection Committee for consideration/decision.

The Departmental Selection Committee is requested to decide/determine the fate of the aforesaid mentioned child of the retired civil servant on Superannuation of his service according to the existing policy.

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


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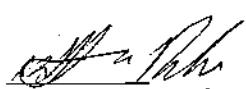
**MINUTES OF THE MEETING OF  
DEPARTMENTAL SELECTION COMMITTEE.**

A meeting of the Departmental Selection Committee was held on Friday, October 13, 2017 at 11.00 a.m. under the Chairmanship of Noorul Hadi, PRO/Press Secretary to Governor, Khyber Pakhtunkhwa, at his office in Governor's House, Peshawar. The following attended the meeting as members: -

1. Mr. Noorul Hadi, Press Secretary to Governor,  
Khyber Pakhtunkhwa, Governor's House, Peshawar.

Chairman 

1. Mr. Khalil-ur-Rehman, Section Officer (Information)  
Govt. of Khyber Pakhtunkhwa, Information and Public  
Relations Department, Peshawar.

Member 

2. Mr. Wasifullah, Superintendent,  
Directorate of General and Public Relations,  
Peshawar

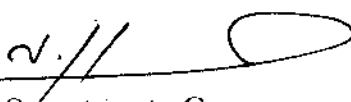
Member 

The meeting was informed that Mr. Muhammad Shoaib, Naib Qasid of this office has been retired from service under superannuation of sixty (60) years on 24/09/2017 (A.N).

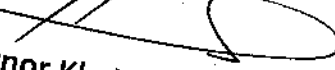
Mr. Muhammad Shoaib, Naib Qasid submitted an application for the appointment of his son Muhammad Hamza Khan for the post of Naib Qasid as per policy instruction issued vide letter No.SOR-I(S&GAD) 4-1/80(VOL:III) dated 23/5/2000, a quota of 25% falling to the share of initial recruitment in **BPS-1 BPS-4** shall be reserved for appointment for the children of retiring civil servant on superannuation.

The case of appointment of Muhammad Hamza Khan was discussed.

The meeting of the Department Selection Committee has considered and recommended the case of appointment of Muhammad Hamza Khan as Naib Qasid **PBS-03** against the quota reserved for appointment for the children of retiring civil servant on superannuation.

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

AUSI

  
PRO to Governor Khyber Pakhtunkhwa  
Governor's House