

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

C.M No. _____/2024
In
Service Appeal No.2307/2023

Muhammad Sajid: **APPLICANT / APPELLANT**


VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

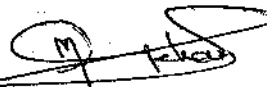
I N D E X

S.#	Description of Documents	Annex	Pages
1.	Suspension Application		1-2
2.	Affidavit		3
3.	Copy of Letter dated 14.06.2024	A	4
4.	Copy of Seniority List	B	5-9

Applicant/Appellant
Through


HAZRAT SAID KHAN
Advocate Supreme Court

&


MUHAMMAD AMIN
Advocate High Court
Cell: 0346-9189142

Dated: 21.06.2024

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

C.M No. _____/2024
In
Service Appeal No.2307/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 13621

Dated 21/6/24

Muhammad Sajid. **APPLICANT/APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

APPLICATION FOR SUSPENDING THE
PROVINCIAL SELECTION BOARD
(PSB) OF FOREST DEPARTMENT FOR
PROMOTION OF SDFO (BPS-17) TO
THE RANK OF DFO (BPS-18), TILL
THE DISPOSAL OF THE INSTANT
APPEAL.

Respectfully Sheweth:

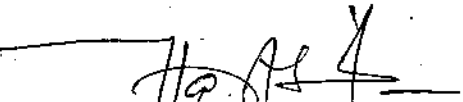
1. That the captioned appeal is being filed before this Hon'ble Tribunal, which is fixed for hearing on 01.07.2024.
2. That the PSB meeting has been scheduled to be held on 25.06.2024 vide Establishment Department letter No.SO(PSB)/ED/1-25/2024(05) dt. 14.6.2024. (Copy of Letter is annex "**A**").
3. That the impugned seniority list forwarded to the PSB has restricted the applicant/appellant from promotion on regular basis, despite the fact that the applicant/appellant is senior from Mr. Muhammad

Usman at Sr.No.3 of the seniority list issued vide No.SO(Estt)FE&WD/1-40/2024/3536-40 dated 15.02.2024. (Copy of Seniority List is annex **"B"**).

4. That the grounds of main appeal may be read as integral part of the instant application.
5. That on the face of the record/appeal, the applicant/appellant has got strong arguable case and is sanguine about its success.
6. That the balance of convenience lies in favour of applicant/appellant.
7. That if stay as prayed for is not granted, then the applicant/appellant would sustain irreparable loss and the titled appeal would become infructuous.

It is, therefore, most humbly prayed that on acceptance of this application, suspension to the extent of Provincial Selection Board (PSB) of Forest Department for promotion of SDFO (BPS-17) to the rank of DFO (BPS-18) may please be granted, till the disposal of the instant appeal.

Applicant/Appellant
Through


HAZRAT SAID KHAN
Advocate Supreme Court

&


MUHAMMAD AMIN
Advocate High Court

Dated: 21.06.2024

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

C.M No. _____/2024
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Muhammad Sajid. **APPLICANT/APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . **RESPONDENTS**

AFFIDAVIT

I, Muhammad Sajid, SDFO (BPS-17), Forest Department, Shami Road, Peshawar do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



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DEPONENT



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

No. SO(PSB)ED/1-25/2024/(05)
Dated Peshawar, the 14.06.2024

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To

1. The Additional Chief Secretary,
Government of Khyber Pakhtunkhwa,
Planning & Development Department.
2. The Senior Member, Board of Revenue,
Khyber Pakhtunkhwa.

SUBJECT: - MEETING OF THE PROVINCIAL SELECTION BOARD.

Dear Sir,

I am directed to refer to the subject and to say that meeting of Provincial Selection Board will be held on 25th June, 2024 at 11:00 AM under the chairmanship of Chief Secretary, Khyber Pakhtunkhwa in the Conference Room of Chief Secretary, Khyber Pakhtunkhwa. Agenda of the meeting alongwith working papers will be provided subsequently.

2. You are requested to kindly make it convenient to attend the meeting.

Yours faithfully,

[Handwritten signature]
SECTION OFFICER (PSB)

14/6/24

Encl. As above

Endst. of even No. & date.

A copy is forwarded to: -

1. The PSO to Chief Secretary, Khyber Pakhtunkhwa.
2. The P.S to Chief Secretary, Khyber Pakhtunkhwa.
3. The P.S to Secretary Establishment Department.
4. The P.S to Special Secretary (Reg.) Establishment Department.

SECTION OFFICER (PSB)

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Annex B

GOVERNMENT OF KHYBER PAKHTUNKHWA
CLIMATE CHANGE, FORESTRY, ENVIRONMENT & WILDLIFE
DEPARTMENT

NOTIFICATION

NO.SO(ESTT) FE&WD/1-40/2024: /3536-40 In pursuance of Section-8(1) of the Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Competent Authority (Secretary Establishment, Khyber Pakhtunkhwa) is pleased to approve to notify final seniority list of Sub-Divisional Forest Officers (BPS-17), Forest Department Khyber Pakhtunkhwa (as stood on 15th February, 2024) for general information.

S.#	Name of Officer with academic qualification	Date of Birth and Domicile	Date of first entry into Govt. Service	Regular appointment/ promotion to the present post			Departmental Examination passed	Remarks
				Date	BPS	Method of recruitment		
1	2	3	4	5	6	7	8	9
1.	Mr. Shabir Ahmad B. Sc. Forestry	1/8/1967 Swat	01/7/2005	24/09/2009	17	By promotion	Passed	SDFO Kalam. Seniority fixed w.e.f 24/09/2009 as per Judgment of Peshawar High Court/Dar-ul-Qaza Swat dated 02/11/2021 & opinion of Law Department dated 15/12/2021.
2.	Mr. Alamgir Khan B. Sc. Forestry	3/1/1969 Swat	01/7/2005	24/09/2009	17	-do-	Passed	--do-- SDFO Alpur
3.	Muhammad Usman M.Sc Forestry	25/3/1989 Charsadda	19/10/2015 SDFO	19/10/2015	17	By Initial recruitment	Passed	DFO Demarcation Peshawar. Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.SO(Cstt)/FE&WD/2-50(91)/PTI, dated 9/8/2023.
4.	Muhammad Arif M. Sc Forestry	16-05-1991 Mohmand	19/10/2015 -SDFO	19/10/2015	17	-do-	Passed	Presently on study leave. Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.SO (Estt)/FE&WD/2-50(91)/PTI, dated 9/8/2023.
5.	Mr. Waseem Abbas M. Sc Forestry	31/03/1982 Kohat	19/10/2015 SDFO	19/10/2015	17	-do-	Not yet	SDFO Working Plan Unit-I Abbottabad Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.SO (Estt)/FE&WD/2-50(91)/PTI, dated 9/8/2023.

PESHAWAR UNIVERSITY

	Mr. Shehryar Khan M.Sc Forestry	03/03/1993 Swabi	14/12/2017 SDFO	14/12/2017	17	By Initial recruitment	Passed	Appointed to the post of DFO (BPS-18) on ACB and posted as DFO Galis Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.SO (Estt)/FE&WD/2-SO(91)/PFI, dated 9/8/2023.
	Mr. Shakeel Ahmad M.Sc Forestry	25/01/1995 Mardan	14/12/2017 SDFO	14/12/2017	17	--do--	Passed	DFO Torghar Seniority fixed as per Judgment of KP Service Tribunal; Opinion of Law Deptt; notified vide A. Deptt; No.SO (Estt)/FE&WD/2-SO(91)/PFI, dated 9/8/2023.
	Muhammad Waqas Khan M.Sc Forestry	01/11/1990 Bannu	14/12/2017	14/12/2017	17	--do--	Passed	Monitoring and Evaluation Officer 10-BTTP Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.SO (Estt)/FE&WD/2-SO(91)/PFI, dated 9/8/2023.
	Mr. Bilal Ahmad-I M.Sc Forestry	04/05/1995 Shangla	14/12/2017 SDFO	14/12/2017	17	--do--	Passed	SDFO Besham Watershed with additional charge of DFO Kohistan Watershed Division Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.SO (Estt)/ FE&WD/ 2-SO(91)/PFI, dated 9/8/2023.
10.	Mr. Shabir Ahmad Jan M.Sc Forestry/M Phil Forestry in Range Management	20/06/1990 Lower Dir.	20/11/2014 F/Ranger 14/12/2017 SDFO	14/12/2017	17	--do--	Passed	Presently under suspension Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.SO (Estt)/ FE&WD/2-SO(91)/PFI, dated 9/8/2023.
11	Mr. Zahid Muhammad M. Sc Forestry	10/10/1994 South Waziristan	14/12/2017 SDFO	14/12/2017	17	--do--	Passed	Appointed to the post of DFO (BPS-18) on ACB and posted as DFO North Waziristan Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.SO- (Estt)/ FE&WD/2-SO(91)/PFI, dated 9/8/2023.

12.	Mr. Shah Fahad M.Sc Forestry	15/08/1989 Bannu	14/12/2017 SDFO	14/12/2017	17	By Initial recruitment	Passed	DFO Bannu Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.SQ(Estt)/FE&WD/2- 50(91)/PFI, dated 9/8/2023.
13.	Mr. Saeed Anwar-II M. Sc Forestry	4/8/1992 Bannu	14/12/2017 SDFO	14/12/2017	17	--do--	Passed	SDFO Karak Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.SQ(Estt)/FE&WD/2- 50(91)/PFI, dated 9/8/2023.
14.	Mr. Anwarullah M.Sc Forestry	08/02/1995 Mansehra	14/12/2017 SDFO	14/12/2017	17	--do--	Passed	DFO Agror Tanawal Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.SQ(Estt)/FE&WD/2- 50(91)/PFI, dated 9/8/2023.
15.	Fahimuddin Solid M. Sc. Forestry	10/9/1975 Mardan	25/8/2007	13/12/2018	17	By Promotion	Passed	SDFO Patrol Squad Southern Circle with Additional charge of DFO Patrol Squad Southern Circle. Seniority restored under Para-VI(a) of Promotion Policy, 2009 vide Notification No. SQ(Estt)/FE&WD/2-39/ 2019, dated 14/06/2021.
16.	Muhammad Saleem B.Sc Forestry	12/12/1964 Abbottabad	01/10/1987	13/12/2018	17	--do--	Passed	DFO Hazara Tribal Battalgram
17.	Mr. Ihsanuddin B.Sc Forestry	20/04/1966 Upper Dir	01/10/1988	13/12/2018	17	--do--	Passed	SDFO Litigation Dir.
18.	Mr. Saeed Ahmad B.Sc Forestry	14/11/91 Mardan	20/11/2014 F/Ranger	10/06/2020	17	--do--	Not Yet	SDFO-Khar
19.	Mr. Umar Nawaz B.Sc. MSc Forestry	18/1/1992 Chitral	20/11/2014 F/Ranger	10/06/2020	17	--do--	Passed	SDFO Droph South
20.	Mr. Tareeb Khan M.Sc Forestry-R.Sc	11/03/1991 Dh.Khan-	20/11/2014 F/Ranger	10/06/2020	17	--do--	Passed	SDFO Tank
21.	Mr. Ghulam Mustafa B.Sc Forestry	01/03/1983 Mardan	20/11/2014 F/Ranger	10/06/2020	17	--do--	Passed	SDFO Sannudra
22.	Mr. Zafar Ullah M.Sc Forestry R.Sc	20/11/1983 Bannu Waziristan	20/11/2014 F/Ranger	10/06/2020	17	--do--	Not Yet	SDFO Droph South

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38.	Sayed Aalam Shah M.Phil Plant Biodiversity and Conservation	30/11/1992 Charsadda	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Thandiani
39.	Ziaullah BS Forestry	12/5/1993 North Waziristan	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO W/P Unit-V
40.	Sayed Maroom Shah M.Sc Forestry	9/4/1992 Mohmand	24/2/2022	24/2/2022	19	--do--	Not yet	SDFO Warai
41.	Mr. Bilal Ahmed Khan M.Sc Forestry	21/4/1994 Mohmand	24/2/2022	24/2/2022	17	By initial recruitment	Not yet	SDFO Daggur
42.	Mr. Salhan Khan M.Sc Forestry	28/2/1995 Lakki Marwal	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Harban
43.	Muhammad Younus B.Sc Forestry	06/02/1993 Lower Dir	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Jandool
44.	Mr. Jafarullah Muhammad M.Sc Forestry	12/10/1994 South Waziristan	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Wannu
45.	Mr. Yasir Raahood M.Sc Forestry	20/09/1996 Bannu	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Kohat
46.	Mr. Zahoor Khan M.Phil Forestry and Wildlife Management	12/7/1993 Bujaur	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Upper Dir
47.	Mr. Sardar Shah M.Sc Forestry	13/01/1995 Abbottabad	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Range Management
48.	Mr. Khurshid Alam M.Phil Forestry and Range Management	03/01/1988 Swat	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Dabrain South
49.	Muhammad Ishtiaq M.Sc Forestry	5/12/1982 Peshawar	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Mirampur
50.	Mr. Mamoon Khan M.Sc Forestry	16/04/1995 Bannu	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Lower Siron with additional charge of SDFO-Upper Siron
51.	Mr. Sajid Anwar M.Phil Forestry and Range Management	08/03/1994 Swabi	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Sadoun
52.	Mr. Kishore Shahzad M.Sc Forestry	01/05/1993 Charsadda	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Kaghan

53.	Mr. Usman Ali M.Phil Forestry and Wildlife Management.	13/12/1992 Mansehra	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Khanpur
54.	Muhammad Waseem Sadiq Abbasi M.Phil Forestry and Wildlife Management	03/04/1995 Haripur	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Bagnoter
55.	Homish Kumar BS Forestry	06/07/1999 Swat	09/06/2022	09/06/2022	17	--do--	Not yet	SDFO Patrol Squad Malakand East
56.	Mr. Sher Amanullah Matric/FSc	27/6/1965 FR Bannu	1/10/1986	7/7/2022	17	By promotion	Not yet	SDFO Orakzal-
57.	Muhammad Riasat Matric/FSc	25/3/1966 Abbottabad	01/10/1986	7/7/2022	17	By promotion	Passed	SDFO Daur Watershed
58.	Muhammad Ali	25/5/1966 Abbottabad	27/11/2007 F/Hangal	20/1/2023	17	--do--	Passed	SDFO Khyber Pakhtunkhwa Forest School Thal Abbottabad

SECRETARY TO GOVERNMENT: OF KHYBER PAKHTUNKHWA
CLIMATE CHANGE, FORESTRY, ENVIRONMENT & WILDLIFE
DEPARTMENT

Dated Peshawar the, 01st April, 2024.

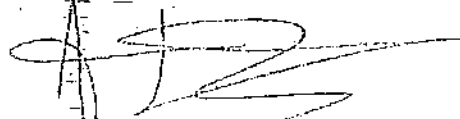
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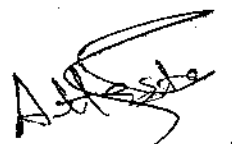
Copy is forwarded to the:

1. Chief Conservator of Forests-I, Khyber Pakhtunkhwa.
2. Chief Conservator of Forests-II, Khyber Pakhtunkhwa.
3. Chief Conservator of Forests Malakand Forest Region-III-Saidu-Sharif Swat.
3. Officers concerned C/O CCF-I, Peshawar.
4. Office Order file.
5. Master file.

ESTT
3/4/24
CCF-I


HAFAZ ABDUL JALEEL
SECTION OFFICER (ESTT)

3/4/24



JAWABDAR HAFIZ ABDUL JALEEL