

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

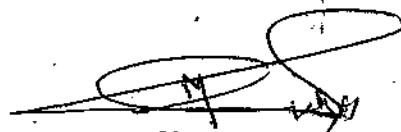
Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 13620

Dated 21/6/24

To be filled by the Counsel/Applicant

Case Number	Service Appeal 2307/2023		
Case Title	Muhammad Syed vs Govt of KP & others		
Date of Institution	2023		
Bench	SB		DB <input checked="" type="checkbox"/>
Case Status	Fresh		Pending <input checked="" type="checkbox"/>
Stage	Notice		Reply <input checked="" type="checkbox"/> Argument <input checked="" type="checkbox"/>
Urgency to clearly stated.	The PSB has been scheduled to be held on 25.06.2024		
Nature of the relief sought.	Stay be granted		
Next date of hearing	01/07/2024		
Alleged Target Date	Monday dated: 24/06/2024		
Counsel for	Petitioner <input checked="" type="checkbox"/>	Respondent <input type="checkbox"/>	In person <input type="checkbox"/>



Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing \_\_\_\_\_ -p/20 \_\_\_\_\_

In case No. \_\_\_\_\_ -p/20 \_\_\_\_\_

Vs \_\_\_\_\_

Presented by \_\_\_\_\_ on behalf of \_\_\_\_\_ Entered  
in the relevant register.

Put up alongwith main case \_\_\_\_\_

REGISTRAR

Last date fixed	
Reason(S) for last adjournment, if any by the Branch Incharge.	
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

**BEFORE THE KHYBER-PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

**SERVICE APPEAL NO. 2307/2023.**

Muhammad Sajid S/O Abdul Qayyum..... (Appellant)

**Versus**

Government of Khyber-Pakhtunkhwa.....(Respondent)

**INDEX**

<b>S.No:</b>	<b>Description of Documents</b>	<b>Annex:</b>	<b>Page No:</b>
01.	Application for early hearing.	--	01
02.	Working Paper alongwith Seniority list.	I	02 to 08
03.	Government of Khyber Pakhtunkhwa Establishment Department letter regarding Provincial Selection Board dated; 14.06.2024.	II	09

Appellant  
Through

Dated: 21 /06/2024.  
Pakistan

  
**HAZRAT SAID KHAN**  
Advocate Supreme Court of

Office: 4-A, Haroon Masnion,  
Khyber Bazar, Peshawar.  
Cell: 03005907014

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

**Service Appeal NO. 2307/2023.**

Muhammad Sajid.....Appellant.

**VERSUS**

Govt: of Khyber Pakhtunkhwa..... Respondent.

**APPLICANT FOR EARLY HEARING**

**Respectfully sheweth:**

1. That the above titled appeal is pending adjudication in which next date of hearing is 01.07.2024.
2. That the respondents have submitted comments and the case is ripe for arguments.
3. That the appellant has already suffered from 08 long years and fixation of long date is further embarrassing for the appellant and late fixation will not serve the purpose.
4. That the promotion case from the post of Sub-Divisional Forest Officer (BPS-17) to the post of Divisional Forest Officer (BPS-18) has recently been processed with the quarter concerned vide Chief Conservator of Forests, Central Southern Forest Region-I, Khyber Pakhtunkhwa, Peshawar letter No. 5649/E, dated; 18.04.2024 followed by the working paper and impugned seniority list of Sub-Divisional Forest Officer (BPS-17), whereby the appellant has been kept at Serial No. 15 **(copy attached as Annex-I)**.
5. That now the Provincial Selection Board's meeting for promotion, has been fixed on **25 June, 2024 at 11:00 AM** under the Chairmanship of the honorable Chief Secretary Khyber Pakhtunkhwa Peshawar and if the appellant request for early hearing before 25 June, 2024 is not being considered then the instant appeal may get infructuous **(copy attached as Annex-II)**.

It is therefore, humbly prayed that on the acceptance of this application, the date already fixed i.e 01.07.2024 may be accelerated and an early date may please be fixed to safeguard the right of the appellant.

Dated; 21-06-2024

**Appellant**  
  
Hazrat Said  
Advocate Supreme Court

CHIEF CONSERVATOR OF FORESTS  
CENTRAL SOUTHERN FOREST REGION-I  
KHYBER PAKHTUNKHWA  
(HAD)



Ann-I  
SHAMI ROAD PESHAWAR

Ph: +92 01 9212177, Fax: +92 91

9211476

E-mail:

[ccfforsts.pesh@gmail.com](mailto:ccfforsts.pesh@gmail.com)

Dated 18 / 04 / 2024

No. 5649 /E,  
To

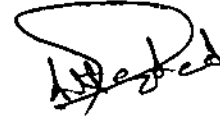
The Section Officer (Establishment)  
Government of Khyber Pakhtunkhwa  
Climate Change, Forestry, Environment & Wildlife  
Department Peshawar

Subject: - PROMOTION/APPOINTMENT OF SDFO (BS-17) TO THE POST OF DFO  
(BS-18) ON REGULAR/ACTING CHARGE BASIS

Memo:-

One copy of the draft working paper complete in all respect in the subject case is Set  
herewith for favor of approval, please.

  
Chief Conservator of Forests  
Central Southern Forest Region-I  
Khyber Pakhtunkhwa Peshawar



**WORKING PAPER FOR PROVINCIAL SELECTION BOARD**

PSB-I

**DEPARTMENT**

**KHYBER PAKHTUNKHWA ENVIRONMENT**

1. Nomenclature of the post/Basic Scale.

Deputy Conservator of Forests (BPS-18)

2. Service /Group/Cadre.

Khyber Pakhtunkhwa Forest Department

3. Sanctioned strength of the cadre.

62 (Annex-I)

	Direct	Promotion	Transfer
(i) Percentage of share	--	100%	--
(ii) No. of posts allocated to each category.	--	62	--
(iii) Present occupancy position	--	51 Nos	--
(v) How did the vacancy lies under promotion quota occurred and since when?	<p><b>Regular vacancies</b></p> <ol style="list-style-type: none"> <li>Promotion of Mr. Hazrat Mir the then DFO to the post of CF (BS-19) w.e.f 06/01/2022 (Annex-II);</li> <li>Promotion of M/S Ahmed Jalil &amp; Asghar Khan DFO to the post of CF (BPS-19) on regular basis w.e.f 14/4/2022 (Annex-III &amp; IV).</li> <li>Retirement of Muhammad Farooq DFO w.e.f 06/02/2023 (Annex-V).</li> <li>Death of Mr. Abdul Mannan DFO dated 18/9/2023 (Annex-VI).</li> <li>Promotion of M/S Farukh Sair, Muhammad Ismail, Amjad Samad, Muhammad Yousaf, Shoukat Fiaz and Muhammad Raza Sher DFO to the post of CF (BPS-19) on regular basis w.e.f 2/11/2023 (Annex-VII).</li> </ol> <p><b>Temporary Vacancies</b></p> <ol style="list-style-type: none"> <li>Due to granting extra-ordinary leave for a period of 730 days in favor of Mr. Raees Khan DFO (BPS-18) w.e.f 15/3/2021, which was further extended for a period of 1278 days w.e.f 15/03/2023 to 13/09/2026 (Annex-VIII &amp; IX).</li> <li>Due to posting of Syed Lateef Hussain DFO in AIP Project as M&amp;E Officer on deputation basis for a period of three years w.e.f 26/10/2023 (Annex-X).</li> <li>Due to posting of Mr. Adnan Ali DFO in IO-BTTP on deputation basis for a period of three years w.e.f 11/09/2020, which was further extended for a period of two years/expiry of the project w.e.f 21/09/2023 (Annex- XI &amp; XII).</li> <li>Due to posting of Mr. Pervez Mannan DFO as Deputy Conservator (BS-18) Wildlife Inventory Ministry of Climate Change &amp; Environmental Coordination Islamabad for a period of three years w.e.f 5/3/2024 (Annex-XIII).</li> </ol>		
(iv) No. of vacancies in each category.	--	11 on Regular and 4 on ACB basis.	--
(vi) Recruitment Rules.	By promotion on the basis of seniority-cum-fitness from amongst holders of the post of Sub Divisional Forest Officer (BPS-17) who have completed such qualifying service as prescribed by the Govt. and have successfully completed such training or passed Departmental Examination as prescribed by the Govt. for the purpose (Annex-XIV).		
(vii) Required length of service.	Five years service in the cadre of (BPS-17).		
(viii) Whether to be promoted on regular basis or appointed on acting charge basis?	11 on Regular and 4 on ACB basis.		
(ix) Mandatory training, if any.	Passing of Departmental Examination.		
(x) Minimum required score on EI.	50%.		

Signature

Designation:

Date

Chief Conservator of Forests

Central Southern Forest Region-I

Khyber Pakhtunkhwa Peshawar.

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

**NOTIFICATION**

**NO.SO(ESTT) FER&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 15<sup>th</sup> 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. Shahir Ahmad B. Sc. Forestry	1/8/1967 Swat	01/7/2005	24/09/2009	17	By promotion	Passed	SDFO Katam. 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. Alarngir 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( Estt)/FER&WD/2-SO(91)/PT, 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)/FER&WD/2-SO(91)/PT, dated 9/8/2023.
5.	Mr. Wazir Abbas M. Sc Forestry	11/03/1982 Kohat	19/10/2015 SDFO	19/10/2015	17	--do--	Not yet	SDFO Working Plan Unit 1 Abbottabad Seniority fixed as per Judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.SO (Estt)/FER&WD/2-SO(91)/PT, dated 9/8/2023.

APPROVED WITH SIGNATURE

*(Handwritten Signature)*

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SCADMEU WUI CDINDSARIRI

11.	Mr. Zahid Muhammad M. Sc Forestry South Waziristan	10/10/1994	14/12/2017	14/12/2017	17	Passed	Appointed to the post of DFO (BPS-18) on 50(91)/PFI, dated 9/8/2023.
10.	Mr. Shabir Ahmad Jan M.Sc Forestry/M Phil Forestry in Range Management Lower Dir.	20/06/1990	20/11/2014	14/12/2017	17	Passed	Presently under suspension Seniority fixed as per judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.50(Estt)/ FE&WD/2- 50(91)/PFI, dated 9/8/2023
9.	Mr. Bilal Ahmad-I M.Sc Forestry Shangla	04/05/1995	14/12/2017	14/12/2017	17	Passed	SFO 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.50(Estt)/ FE&WD/ 2- 50(91)/PFI, dated 9/8/2023.
8.	Muhammad Waqas Khan M.Sc Forestry Bannu	01/11/1990	14/12/2017	14/12/2017	17	Passed	Monitoring and Evaluation Officer 10-BTP Seniority fixed as per judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.50(Estt)/ FE&WD/2-50(91)/PFI, dated 9/8/2023.
7.	Mr. Shakeel Ahmad M.Sc Forestry Mardan	25/01/1995	14/12/2017	14/12/2017	17	Passed	Seniority fixed as per judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.50 (Estt)/ FE&WD/2-50(91)/PFI, dated 9/8/2023.
	Mr. Shehryar Khan M.Sc Forestry Swabi	03/03/1993	14/12/2017	14/12/2017	17	Passed	Appointed to the post of DFO (BPS-18) on Seniority fixed as per judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide A. Deptt; No.50 (Estt)/FE&WD/2-50(91)/PFI, dated 9/8/2023.

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12.	Mr. Shah Fahad M.Sc Forestry	15/08/1989	Bannu	14/12/2017	SDFO	14/12/2017	17	By Initial recruitment	Passed	SDFO Bannu Seniority fixed as per judgment of KP Service Tribunal, Opinion of Law Deptt; notified vide No.S0(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.S0(Estt)/FE&WD/2- 50(91)/PFI, dated 9/8/2023.
14.	Mr. Amanullah 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.S0(Estt)/FE&WD/2- 50(91)/PFI, dated 9/8/2023.
15.	Muhammad Sajid M.Sc Forestry	10/4/1975	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-V(d) of Promotion Policy, 2009 vide Notification No. 50(Estt)/FE&WD/1-39/ 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 Baligram	
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	10/06/2020	17	-do-	Not yet	SDFO Khar	
19.	Mr. Umar Nawaz B.Sc Misc Forestry	18/1/1992	Chitral	20/11/2014	10/06/2020	17	-do-	Passed	SDFO Dosh South	
20.	Mr. Turab Khan M.Sc Forestry & B.Sc	21/03/1991	D.I.Khan	20/11/2014	10/06/2020	17	-do-	Passed	SDFO Tank	
21.	Mr. Ghulam Muraza B.Sc Forestry	01/03/1983	Mansehra	20/11/2014	10/06/2020	17	-do-	Passed	SDFO Mansehra	
22.	Mr. Zahid Ullah M.Sc Forestry & B.Sc	20/05/1983	North Waziristan	20/11/2014	10/06/2020	17	-do-	Not yet	SDFO FWSM Circle	

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SDFO Bannu  
A.A. Sadiq



38.	Sayed Aslam Shah M.Phil Plant Biodiversity and Conservation	30/1/1992 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.	Sayyed Masoom Shah M.Sc Forestry	9/4/1992 Mohmand	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Waral
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 Daggar
42.	Mr. Salman Khan M.Sc Forestry	28/2/1995 Lakki Marwat	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Harban
43.	Muhammad Younas B.Sc Forestry	06/02/1993 Lower Dir	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Jandool
44.	Mr. Irfanullah Muhammadi M.Sc Forestry	12/10/1994 South Waziristan	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Wanna
45.	Mr. Yasir Mahinood	Bannu 20/09/1996	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 Bajaur	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Upper Dir
47.	Mr. Safdar Shah	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 Behrain South
49.	Muhammad Ishfaq M.Sc Forestry	5/12/1982 Peshawar	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Nizampur
50.	Mr. Mamoon Khan	Bannu 16/04/1995	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Lower Siran with additional charge of SDFO Upper Siran
51.	Mr. Sajid Aman M.Phil Forestry and Range Management	04/03/1994 Swabi	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Gadoon
52.	Mr. Khurram Shahzad M.Sc Forestry	01/05/1993 Charsadda	24/2/2022	24/2/2022	17	--do--	Not yet	SDFO Kaginai

PUNJAB FOREST DEPARTMENT

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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 Bagnoler
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 Orakzai
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/Ranger	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

Endst No: SO (Estt)/FE&WDI-40/2024

Dated Peshawar the, 01<sup>st</sup> April, 2024.

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  
CF-I

  
[JAFIZ ABDUL JABBAR]  
SECTION OFFICER (ESTT)

3/4/2024

RECEIVED WITH COMPLAINT





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

Ann-II

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

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 25<sup>th</sup> 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,

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)