

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Misc: Application No. _____/2024
IN
Service Appeal No. 1036 /2024

Engr. Hassan Jan.....Appellant

Versus

The Govt. of KPK and others Respondents

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Applicant/Appellant

Through


Khaled Rahman
Advocate,
Supreme Court of Pakistan

4-B, Haroon Mansion,
Khyber Bazar, Peshawar.
Off: 091-2592458
Cell # 0345-9337312

Dated: 4 /09/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Misc: Application No. _____/2024

**Khyber Pakhtukhwa
Service Tribunal**

IN

Service Appeal No. 1036 /2024

Diary No. 15395

Dated 04.09.2024

Engr. Hassan Jan.....Appellant

Versus


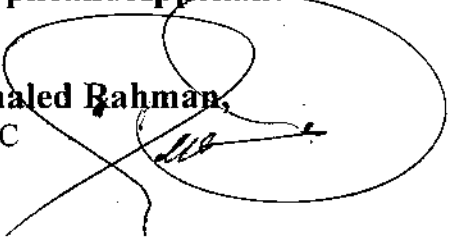
The Govt. of KPK and others Respondents

Application on behalf of appellant for placing on file essential documents having bearing upon the case.

Respectfully Sheweth,

1. That the titled Service Appeal is pending before the Hon'ble Tribunal and is fixed for hearing on 04.09.2024;
2. That on 29.07.2024, the appellant was directed to place on file the seniority list issued after appointment as well as promotion order of the appellant.
3. That pursuant to the directions above, the mentioned documents are submitted to be placed on record having bearing upon the case.


It is therefore humbly prayed that on acceptance of this application, the attached documents may graciously be allowed to place on record.

Applicant/Appellant 
Through
Khaled Rahman,
 ASC 

Dated: 04/09/2024

Verification

Verified that the contents of the applicant are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Tribunal.


 Deponent

**TENTATIVE SENIORITY LIST OF ASSISTANT ENGINEERS/SDOs BS-17
COMMUNICATION AND WORKS DEPARTMENT As Stood On 01.01.2023**

| Name of No. | Academic Officer | Date of Qualification | Domicile Birth | Date of Ist | Date of Appointment/ Entry in Govt. Service | Promotion in Present Grade | Remarks |
|-------------|-------------------------|--------------------------------------|----------------|--------------|--|----------------------------|---------|
| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) |
| 01 | Nadia Bashir | B.Sc (Civil)/ MS (Transportation) | 29/01/1986 | Abbottabad | 24/12/2010 | 24/12/2010 | — |
| 02 | Muhammad Imran | B.Sc/M.Sc (Civil) | 20/08/1985 | Swat | 24/12/2010 | 24/12/2010 | — |
| 03 | Muhammad Asad | B.Sc (Civil) | 24/12/1963 | Kohat | 07/12/1990 | 24/01/2012 | — |
| 04 | Umer Hayat | B.Sc (Civil) | 02/03/1975 | Karak | 22/04/2013 | 22/04/2013 | — |
| 05 | Khalid Usman | B.Sc (Civil) | 02/02/1978 | F.R.Kohat | 30/04/2013 | 30/04/2013 | — |
| 06 | Hayatullah Noor | B.Sc (Civil) | 19/04/1979 | N.W.Agency | 30/04/2013 | 30/04/2013 | — |
| 07 | Hayatullah Jan | B.Sc (Civil) | 03/03/1965 | Lakki Marwat | 12/12/1990 | 03/07/2013 | — |
| 08 | Zahoor Eilahi Baig | B.Sc (Civil) | 07/01/1964 | Haripur | 6/03/1988 | 03/07/2013 | — |
| 09 | Shahid Nawaz | B.Sc (Civil) | 01/08/1964 | Peshawar | 19/02/1990 | 19/02/2014 | — |
| 10 | Muhammad Asghar Khan | B.Sc (Civil) | 30/12/1964 | Swabi | 17/03/1988 | 19/05/2014 | — |
| ✓11 | Badrul Islam | B.Sc (Civil) | 01/06/1965 | Peshawar | 12/12/1990 | 04/03/2015 | — |
| ✓12 | Hassan Jan | B.Sc (Civil) | 20/10/1964 | Lakki Marwat | 23/04/1995 | 04/03/2015 | — do — |
| 13 | Sher Bahadar | B.Sc (Civil) | 03/05/1965 | Dir Lower | 19/12/1990 | 13/10/2015 | — |
| 14 | Muhammad Ghazanfarullah | B-Tech (Hons) | 04/05/1964 | Bannu | 21/10/1986 | 04/11/2016 | — |
| 15 | Faizan Akbar | B.Sc/M.Sc (Civil) | 20/04/1990 | Swabi | 10/05/2017 | 10/05/2017 | — |

Seniority fixed in light of court order vide this Deptt' Notification dated 14.12.2022

ATTESTED

Amna

2



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

No. SOE/C&WD/8-15/2023 (Seniority)
Dated Peshawar, the Jan 11, 2023

To

1. The Chief Engineer (Centre)
C&W, Peshawar
2. The Chief Engineer (North)
C&W Swat, Stationed at Saidu Sharif
3. The Chief Engineer (CDO)
C&W Peshawar
4. The Chief Engineer (East)
C&W Abbottabad
5. The Chief Engineer (South-I)
C&W, Peshawar
6. The Chief Engineer (South-II)
C&W, Dikhan
7. The Chief Engineer (Maintenance)
Peshawar
8. The Chief Engineer (Foreign Aid)
Peshawar
9. The Chief Engineer (Mega Projects)
Peshawar
10. The Managing Director
PKHA, Peshawar

A-0

Pakhtunkhwa Highways Authority Peshawar

| | |
|-------------------|------------|
| Diary No. 3003 | 12/11/2023 |
| (1) I.D. | |
| (2) Dir. District | 3 |
| (3) Dir. (Muzir) | |
| (4) B | |

one copy of the
seniority list to my
P.F.
3.

- Subject: (1) TENTATIVE SENIORITY LIST OF CHIEF ENGINEERS (BS-20) C&W DEPARTMENT AS STOOD ON 01.01.2023
- (2) TENTATIVE SENIORITY LIST OF SUPERINTENDING ENGINEERS (BS-19) C&W DEPARTMENT AS STOOD ON 01.01.2023
- (3) TENTATIVE SENIORITY LIST OF EXECUTIVE ENGINEERS (BS-18) C&W DEPARTMENT AS STOOD ON 01.01.2023
- (4) TENTATIVE SENIORITY LIST OF ASSISTANT ENGINEERS/SDOs (BS-17) C&W DEPARTMENT AS STOOD ON 01.01.2023

I am directed to refer to the subject noted above and to forward herewith copies of tentative seniority lists of Chief Engineers (BS-20), Superintending Engineers (BS-19), Executive Engineers (BS-18) and Assistant Engineers/SDOs (BS-17) C&W Department with the request that the objections/omissions, if any, may be reported to this Department **within 15 days positively** for rectifications, please.

Zahoor
11-01-2023
(ZAHOOR SHAH)
SECTION OFFICER (Estb)

Endst even No. & date

Copy forwarded to the:

1. Director (Technical) C&W Department, Peshawar
2. Director (IT) C&W Department Peshawar
3. PS to Secretary C&W Department, Peshawar
4. PA to Additional Secretary C&W Department, Peshawar
5. PA to Additional Secretary (Tech) C&W Department, Peshawar
6. PA to Deputy Secretary (Admin/Tech) C&W Department, Peshawar

Zahoor
11-01-2023
SECTION OFFICER (Estb)

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
PAKHTUNKHWA HIGHWAYS AUTHORITY (PKHA)

Tele: # 091-9210557-9210964, Fax # 091-9210434, E-mail: info@pkha.gov.pk

Attached Department Complex, Gate No. 5, Khyber

No: 811 / Advt-22 / PKHA

Dated: 17/01/2023

To,

1. Director - II,
PKHA, Peshawar
2. Director - III,
PKHA, Peshawar.
3. Deputy Director (HQ),
PKHA, Peshawar.
4. Deputy Director (Center),
PKHA, Peshawar.
5. Deputy Director (South, North, East, RMU, Merged Areas),
PKHA, Peshawar.

- Subject: - 1) TENTATIVE SENIORITY LIST OF CHIEF ENGINEERS (BS-20) C&W DEPARTMENT AS STOOD ON 01-01-2023
2) TENTATIVE SENIORITY LIST OF SUPERINTENDING ENGINEERS (BS-19) C&W DEPARTMENT AS STOOD ON 01-01-2023
3) TENTATIVE SENIORITY LIST OF EXECUTIVE ENGINEERS (BS-18) C&W DEPARTMENT AS STOOD ON 01-01-2023
4) TENTATIVE SENIORITY LIST OF ASSISTANT ENGINEERS/SDOS (BS-17) C&W DEPARTMENT AS STOOD ON 01-01-2023

I am directed to forward herewith a copy of Section Officer (Estb), Communication & Works Department, Govt. of Khyber Pakhtunkhwa letter, bearing No. SOE/C&WD/8-15/2023(Seniority) Dated: 11-01-2022, along with copies of tentative seniority list of Chief Engineers (BPS-20), Superintending Engineers (BPS-19), Executive Engineers (BPS-18) and Assistant Engineers/SDOs (BPS-17) C&W Department with the request that report objections / omissions if any, may be reported to this office within 10 days positively for onward submission to quarter concerned for rectifications.

DEPUTY DIRECTOR (ADMIN)
PKHA

Copy of the above is forwarded to the

1. PA to Managing Director, PKHA Peshawar, for information of M-D, PKHA

DEPUTY DIRECTOR (ADMIN)
PKHA

ATTACHED



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Amir B

Dated Peshawar the April 03, 2024

NOTIFICATION:

No. SOE/C&WD/4-5/2024: On the recommendations of Provincial Selection Board (PSB), the Competent Authority has been pleased to promote the following Assistant Engineers/SDOs (BS-17) of C&W Department to the post of Executive Engineers (BS-18) on regular basis, with immediate effect:

- | | |
|-----------------------------------|----------------------------|
| i. Engr. Zahoor Elahi Baig | Promotion on regular basis |
| ii. Engr. Hassan Jan | Promotion on regular basis |
| iii. Mr. Muhammad Ghazanfar Ullah | Promotion on regular basis |
| iv. Engr. Faizan Akbar | Promotion on regular basis |
| v. Engr. Muhammad Junaid | Promotion on regular basis |
| vi. Engr. Ifikhar Qayyum | Promotion on regular basis |
| vii. Engr. Nasir Iqbal | Promotion on regular basis |
| viii. Engr. Wasim Akbar | Promotion on regular basis |
| ix. Engr. Muhammad Ishaq | Promotion on regular basis |
| x. Engr. Khushdil Khan | Promotion on regular basis |
| xi. Engr. Abdullah | Promotion on regular basis |
| xii. Engr. Umair Ahmad Jan | Promotion on regular basis |
| xiii. Engr. Akbar Mehboob Khattak | Promotion on regular basis |
| xiv. Engr. Imran Khan | Promotion on regular basis |
| xv. Mr. Ali Rehman | Promotion on regular basis |

2. The above officers shall remain on probation for a period of one year in terms of Rule-15 of (Appointment, Promotion & Transfer) Rules, 1989, while the officers appearing at Sl.No. I, II, III & XV will be on probation till their retirements.

3. Consequent upon their promotion, the Competent Authority is further pleased to order the transfer/posting of the following officers of C&W Department to actualize their promotion against the posts as mentioned against each, with immediate effect, in the best public interest.

| Sl. No. | Name of Officer & Designation | From | To | Remarks |
|---------|--|---|--|-----------------|
| 1. | Engr. Zahoor Elahi Baig XEN (BS-18) | XEN (OPS) C&W Division Kohistan Upper | XEN C&W Division Kohistan Upper | — |
| 2. | Engr. Hassan Jan XEN (BS-18) | Deputy Director (OPS) PKHA Peshawar | Senior Engineer (Survey/RMU) O/O CE (CDO) C&W Peshawar. After actualization his promotion to BS-18 reposted as Deputy Director PKHA Peshawar | — |
| 3. | Mr. Muhammad Ghazanfar Ullah XEN (BS-18) | SDO O/O XEN (Mega Projects-II) C&W Peshawar | Design Engineer O/O CE (Center) C&W Peshawar | Vacant Post? |
| 4. | Engr. Faizan Akbar XEN (BS-18) | Deputy Director (OPS) PaRSA/USAID | Design Engineer O/O CE (South-I) C&W Peshawar. After actualization his promotion to BS-18 reposted as Deputy Director PaRSA / USAID | — |
| 5. | Engr. Muhammad Junaid XEN (BS-18) | XEN (OPS) Building Division D.I. Khan | XEN Building Division D.I. Khan | — |
| 6. | Engr. Ifikhar Qayyum XEN (BS-18) | XEN (OPS) Building Division Mansehra | XEN Building Division Mansehra | — |

P.T.O

CS CamScanner

Signature

| | | | | |
|-----|--|---|--|-------------|
| 7. | Engr. Nasir Iqbal XEN (BS-18) | Waiting for posting | XEN Highway Division Dir Lower to be vacated by Engr. Sami Ullah on his promotion to BS-19 | - |
| 8. | Engr. Wasim Akbar XEN (BS-18) | XEN (OPS) C&W Division Kohistan Lower | XEN C&W Division Kohistan Lower | -- |
| 9. | Engr. Muhammad Ishaq XEN (BS-18) | SDO O/O XEN Building Division-I Peshawar | Design Engineer O/O CE (Mega Projects) C&W Peshawar | Vacant post |
| 10. | Engr. Khushdil Khan XEN (BS-18) | XEN (OPS) C&W Division Lakki Marwat | XEN C&W Division Lakki Marwat | - |
| 11. | Engr. Abdullah XEN (BS-18) | Deputy Director (OPS) O/O Director Anti-Corruption Establishment Peshawar | Design Engineer O/O Chief Engineer (South-I) C&W Peshawar. After actualization his promotion to BS-18 reposted as Deputy Director O/O Director Anti-Corruption Establishment Peshawar. | - |
| 12. | Engr. Umar Ahmad Jan XEN (BS-18) | Authorized to hold the charge of the post of XEN Highway Division Swabi | Design Engineer O/O Chief Engineer (Maintenance) C&W Peshawar and also authorized to continue holding the Additional Charge of the post of XEN Highway Division Swabi, in addition to his duty | Vacant Post |
| 13. | Engr. Akbar Mehboob Khattak XEN (BS-18) | SDO O/O XEN Highway Division Mardan | XEN Building Division Mohmand | -do- |
| 14. | Engr. Imran Khan XEN (BS-18) | SDO O/O XEN Highway Division Bajaur | XEN Highway Division Bajaur | -do- |
| 15. | Mr. Ali Rehman XEN (BS-18) | Assistant Director O/O MD PKHA Peshawar | Executive Engineer O/O CE (East) C&W Abbottabad. | -do- |

SECRETARY TO
Government of Khyber Pakhtunkhwa
Communication & Works Department

Copy is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. All Chief Engineers C&W Department.
3. Managing Director PKHA Peshawar
4. Superintending Engineers C&W Circle concerned.
5. Executive Engineers C&W Division concerned.
6. Executive Engineers Building/Highway Divisions concerned.
7. District Account Officers concerned.
8. Accounts Officers Tribal District concerned.
9. PS to Minister for C&W Department Khyber Pakhtunkhwa.
10. PS to Secretary, C&W Department Peshawar.
11. PA to Additional Secretary (Admn/Tech), C&W Department Peshawar.
12. PA to Deputy Secretary (Admn/Tech), C&W Department Peshawar.
13. Officers concerned.
14. Office order File/Personal File.
15. The Manager Govt. Printing Press, Khyber Pakhtunkhwa Peshawar.

01 am
03.04.2024
SECTION OFFICER (Estb)



GOVERNMENT OF KHYBER PAKHTUNKHWA
COMMUNICATION & WORKS DEPARTMENT

Dated Peshawar the Nov 07, 2023

7

NOTIFICATION:

No.SOE/C&W/4-5/2023:

On the recommendations of Provincial Selection Board (PSB), the Competent Authority has been pleased to promote the following Assistant Engineers/SDOs (BS-17) of C&W Department to the post of Executive Engineer (BS-18) on regular basis, with immediate effect:

- | | | |
|-------|----------------------------|----------------------------|
| i. | Engr. Muhammad Asad | Promotion on Regular basis |
| ii. | Engr. Umer Hayat | Promotion on Regular basis |
| iii. | Engr. Khalid Usman | Promotion on Regular basis |
| iv. | Engr. Hayatullah Noor | Promotion on Regular basis |
| v. | Engr. Hayatullah Jan | Promotion on Regular basis |
| vi. | Engr. Shahid Nawaz | Promotion on Regular basis |
| vii. | Engr. Muhammad Asghar Khan | Promotion on Regular basis |
| viii. | Engr. Badrul Islam | Promotion on Regular basis |

2. The above officers shall remain on probation for a period of one year in terms of Rule-15 of (Appointment, Promotion & Transfer) Rules, 1989, while the officers appearing at Sr.No. i & vi will be on probation till their retirements.

3. Consequent upon their promotion, the Competent Authority is further pleased to order the transfer/posting of the following officers of C&W Department to actualize their promotion against the posts, which they have already occupied, with immediate effect, in the best public interest, while the posting/transfer of the officer at Sr.No. vi will be issued later on:-

| Sr. No. | Name of Officer & Designation | From | To |
|---------|------------------------------------|--|---|
| 1 | Engr. Muhammad Asad (BS-18) | Design Engineer O/O Chief Engineer (Foreign Aid) Peshawar in his own pay & scale | Design Engineer O/O Chief Engineer (Foreign Aid) Peshawar |
| 2 | Engr. Umer Hayat (BS-18) | Executive Engineer C&W Division Karak in his own pay & scale | Executive Engineer C&W Division Karak |
| 3 | Engr. Khalid Usman (BS-18) | Deputy Director PKHA Peshawar in his own pay & scale | Senior Engineer (Survey/RMU) O/O CE (CDO) C&W Peshawar for actualization of his promotion as (BS-18) on regular basis and reposted as Deputy Director PKHA Peshawar |
| 4 | Engr. Hayatullah Noor (BS-18) | Executive Engineer Mega Projects (South-I) D.I. Khan in his own pay & scale | Executive Engineer Mega Projects (South-I) D.I. Khan |
| 5 | Engr. Hayatullah Jan (BS-18) | Executive Engineer Building Division Bajaur in his own pay & scale | Executive Engineer Building Division Bajaur |
| 6 | Engr. Muhammad Asghar Khan (BS-18) | Deputy Director O/O Director (Technical) C&W Department, Peshawar in his own pay & scale | Deputy Director O/O Director (Technical) C&W Department, Peshawar |
| 7 | Engr. Badrul Islam (BS-18) | Deputy Director PKHA Peshawar in his own pay & scale | Design Engineer O/O CE (South-I) C&W Peshawar for actualization of his promotion as (BS-18) on regular basis and reposted as Deputy Director PKHA Peshawar |

SECRETARY TO
Government of Khyber Pakhtunkhwa
Communication & Works Department

P.T.O

ATTENDED

Endst of even number and date

Copy is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. All Chief Engineers C&W Department
3. Managing Director PKHA Peshawar
4. Superintending Engineer C&W Circles concerned
5. Executive Engineers Building/Highways/C&W Divisions concerned
6. District Accounts Officers concerned
7. PS to Minister for C&W Department Khyber Pakhtunkhwa Peshawar
8. PS to Secretary C&W Department, Peshawar
9. PA to Additional Secretary (Admn/Tech) C&W Department, Peshawar
10. PA to Deputy Secretary (Admn/Tech) C&W Department, Peshawar
11. Officers concerned
12. Office order File
13. The Manager Govt Printing Press, Khyber Pakhtunkhwa, Peshawar

Zahoor
07.11.2023
(ZAHOOR SHAH)
SECTION OFFICER (Estb)