

FORM OF ORDER SHEET

Court of _____

Appeal No. 1421/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09-Sep-24	<p>The appeal of Mr. IMRAN KHAN presented today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 18-Sep-24. Parcha Peshi given to counsel for the appellant.</p>

By order of the Chairman


REGISTRAR

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1421 /2024

Imran Khan

Versus

Chief Engineer & Others

I N D E X

S. No.	Description of Documents	Annex	Page
1	Memo of Appeal		1-4
2	Service Rules 2010	"A"	5-7
3	Seniority List of Account Clerks dated 01-04-24	"B"	8-13
4	Seniority List of Senior Clerks dated 02-04-24	"C"	14-21
5	Representation dated 10-05-2024	"D"	22-23
6	Application for Interim Relief		24-25

Dated: 06-09-2024

Through

Appellant


Saad Ullah Khan Marwat
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar
0345-9047738

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1421, 2024

Imran Khan, Senior Clerk,
Communication & Works
Department, Peshawar Appellant

Versus

1. Chief Engineer Centre C & W,
Department, Khyber Road,
Near Police Hospital, Peshawar.
2. Secretary, Govt. of KP
C & W Department,
Khyber Road near Police
Hospital, Peshawar.
3. Administrative Officer, C & W
Department, Khyber Road,
Near Police Hospital, Peshawar Respondents

↔<=>↔<=>↔<=>↔<=>↔

**APPEAL UNDER SECTION 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST SENIORITY LIST
NO. 193-E / 534 / CEC / C & W D AND NO. 192-E /
542 / CEC / C & W D BOTH DATED 01-04-2024 AND
02-04-2024 RESPECTIVELY OF R. NO. 01 WHEREBY
2 SEPARATE SENIORITY LISTS OF ACCOUNTS
CLERKS AND SENIOR CLERKS WERE CIRCULATED
FOR NO LEGAL REASON.**

↔<=>↔<=>↔<=>↔<=>↔

Respectfully Sheweth:

1. That appellant being qualified, was appointed as Junior Clerk now B-11 and with the passage of time and hard work he was promoted as Senior Clerk B-14 and now are suitable and fit for promotion to the post of Assistant B-16, as per service rules.

2. That on 25-03-2010, C & W department issued Notification wherein method of recruitment, qualification and other conditions were specified. At S. No. 21 post of Assistant B-16 was to be filled up:-
 - a. 25% by initial recruitments; and 75% by promotion on the basis of seniority cum-fitness; from amongst the Accounts Clerks / Senior Clerks, with at least five years' service as such,

Note: - for the purpose of promotion a joint seniority list of Accounts Clerks and Senior Clerks shall be maintained. (Copy as annex "A")
3. That in disregard of the aforesaid rules / law, the department issued double separate seniority lists on 01-04-2024 and 02-04-2024 respectively, wherein both the categories i.e. Accounts Clerks B-14 and Senior Clerks B-14 of the department was circulated for promotion to the post of Assistant B-16. No distinction was drawn as to whether the authority shall utilize seniority list of Accounts Clerks or Senior Clerks. (Copies as annex "B" & "C")
4. That the department adopted a unique procedure by promoting Senior Clerks to the post of Account Clerks but such procedure as nullity in the eyes of law as how a same scale B-14 i.e. Senior Clerk be promoted as Account Clerk B-14.
5. That to further clarify the position in the rules ibid, the post of Superintendent B-17 was to be filled amongst Assistant / Senior Scale Stenographers B-16 at joint seniority list and not a separate list and the department is issuing joint seniority list for the purpose of promotion.
6. That on 24-04-2024, appellant came to know about the issuance of seniority lists dated 01-04-2024 and 02-04-2024, so on 10-05-2024, he submitted representation before R. No. 02 by stating therein facts and circumstances of the case regarding earlier joint seniority list of the Accounts Clerks and Senior Clerks and separate seniority lists of the two categories but in vain. (Copy as annex "D")

Hence this appeal, inter alia, on the following grounds:-

G R O U N D S:

- a. That issuing joint seniority list for both the categories of Accounts Clerks and Senior Clerks, promotion to the post of Assistant was to be made in joint seniority list of the both the categories and not separate seniority lists.
- b. That career progression is the right of the petitioners but the respondents by adopting the illegal practice of issuing separate seniority list is depriving the petitioners from their due right of promotion to the higher post / grade.
- c. That in presence of Notification dated 25-03-2010, the authority is not empowered to issue two separate seniority lists unless and until the said rules are not amended.
- d. That in the said Notification, note was given which provided joint seniority list of the Account Clerks and Senior Clerks was to be maintained for further promotion to the next higher post / grade.
- e. That no bifurcation was made in the two seniority lists as to which one shall act upon earlier and to what extent. This creates ambiguity amongst the employees of both the categories which requires worth consideration.
- f. That respondents has adopted a unique, illegal and against law and rules by issuing two separate seniority lists for the post of Accounts Clerks and Senior Clerks.
- g. That appellant being Senior Clerk would suffer a lot from illegal and unwarranted practice of the department requested the authority time and again to follow the rules in letter and spirit but in vain.
- h. That process of promotion to the further post is carried out on the two separate seniority lists the same would be null and void as per the rules ibid.

I. That no reason whatsoever was given to adopt and separate the categories of Accounts Clerks and Senior Clerks so the double seniority lists are of no legal effect, rather based on ulterior motive.

It is, therefore, most humbly prayed that on acceptance of the Appeal, Notifications dated 01-04-2024 and 02-04-2024 (both) be set aside and Notification dated 25-03-2010 be implemented / restored by issuing combined seniority list of both the categories i.e. Accounts Clerks and Senior Clerks and promotions be made from the combined seniority list, with such other relief as may be deemed proper and just in circumstances of the case.

Appellant

Through

Saadullah Khan Marwat

Arbab Saiful Kamal

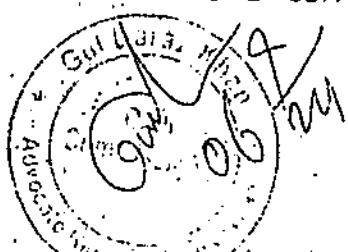
Amjad Nawaz

Advocates

Dated: 06-09-2024

AFFIDAVIT

I, Imran Khan (Appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief.



DEPONENT

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

ADVOCATE

BETTER COPY

REGISTERED NO. P.III

EXTRAORDINARY

GOVERNMENT



GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, MONDAY, 15TH APRIL, 2010.

GOVERNMENT OF NWFP
COMMUNICATION & WORKS DEPARTMENT

NOTIFICATION

Dated: 25th March, 2010.

No. SOE/C&WD/8-12/2009. --- In pursuance of the provisions contained in sub rule (2) of Rule-3 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and in supersession of all previous rules, issued in this behalf, the Communication & Works Department in consultation with establishment Department and Finance Department hereby lays down, the method of recruitment, qualification and other conditions specified in columns 3 to 5 of the Appendix to this Notification which shall be applicable to posts in column 2 of the said Appendix.

Secretary to Govt of NWFP
Communication & works Department.

Sl. No.	Nomenclature of Post	Minimum Qualification Required for Appointment/ Promotion	Age Limit	Method of Recruitment
1	2	3	4	5
1	Budget & Accounts Officer			Superintendents, with at least 5 years service as such.
18.	Superintendents		-	By Promotion, on the basis of seniority-cum-fitness, from amongst Assistants and Senior Scale Stenographers with at least five years service as such. <u>Note:</u> For the purpose of promotion, a joint seniority list of Assistants and Senior Scale Stenographers will be maintained. If the date of appointment of both the officials is the same, then Assistant will rank senior.
19.	Divisional Accounts Officer		-	By Transfer from Audit Department
20.	Senior Scale Stenographer	a: Bachelor's Degree/ B-Com from a recognized University; AND b: A speed of 100 words per minute in short hand in English and 40 words per minute in English typing.	18 – 30 Years	By promotion, on the basis of seniority-cum-fitness, from amongst the Stenographers (Junior) with at least five years services as such.
21.	Assistant	Second Class Bachelor's Degree from a recognized University	21- 32 Years	a. Twenty Five percent (25%) by Initial Recruitments; and b. Seventy five percent (75%) by promotion, on the basis of seniority-cum-fitness, from amongst the Accounts Clerks/ Senior Clerks, with at least five years service as such. <u>Note:</u> For the purpose of promotion a joint seniority list of Accounts Clerks and Senior Clerks shall be maintained.
22.	Stenographer (Junior)	a. Intermediate/ D-Com from a recognized Board; b. A speed of 50 words per minute in Short hand in English and 35 words per minute in English typing; and c. Computer knowledge of MS Word and	18 – 30 years	By Initial Recruitment.

Sl. No.	Nomenclature of Post	Minimum Qualification Required for Appointment / Promotion	Age Limit	Method of Recruitment
1	2	3	4	5
23.	Accounts Clerk/ Senior Clerk	Excel	-	a) By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks, with at least three years service as such.
24.	Junior Clerk	i. Secondary Certificate from recognized Board; and ii. A speed of 30 words per minute in English typing.	18 – 30 Years	a. Eighty percent (60%) by Initial Recruitment; AND b. Twenty percent (20%) by promotion; from amongst the Daftaries, Record Lifters, Naib Qasids, Chowkidars, and other equivalent posts who have been Secondary School Examination and are under 45 years of age and have at least two years service as such in the Department.
25.	Driver	Possessing a valid LTV/HTV Driving License with five years experience, having Primary/ Middle Standard qualifications	21 – 35 Years	By Initial Recruitment
26.	Daftary/ Record Lifter/ Dafadar	Literate/Middle, preference will be given to Ex-Service Men	18 – 35 Years	By promotion, from amongst the Naib Qasids/ Chowkidars, having Middle Standard qualification
27.	Naib Qasid	Middle Standard qualification	18 – 35 Years	By Initial Recruitment
28.	Chowkidar	Literate/ Primary Standard qualification	18 – 35 Years	By Initial Recruitment

Note: For the purpose of promotion, there shall be maintained a joint seniority list of Daftaries, Record Lifters, Naib Qasids, Chowkidars, with reference to the date of regular appointment to the post or that of acquiring the Secondary School Certificates, whichever is later; provided that if two dates are the same, the person older in age or having longer service, whichever is more beneficial to him, shall rank senior.

FINAL SENIORITY LIST

hereby notified as under:

puruance to Section 8 (1) and (5) of the Khyber Pakhtunkhwa Civil Servants Act 1973, read with C&W Department (Recruitment/Appointment) Rules 2010
offered vide No. SOE/C&W/8-12/2009 dated 25/03/2010, the Final Seniority List of Accountants Clerks (BPS-1A) of the C&W Department as stood on 31/ 03 /2024

Dated: 01 /02/2024

No. 193-E/ 534 /CE/C&W

KHYBER PAKHTUNKHWA PESHWARIAN
COMMUNICATION & WORKS DEPARTMENT
OFFICE OF THE CHIEF ENGINEER (CENTRE)

Sl.no.	Name of Officer	Father's Name	Domicile	Qualification	Date of entry into DOB	Date of appointment to Govt Service	Class	Remarks
1	Afzalat Khan	Hakiq Khan	Battagram	F.Sc	02-03-1968	17-02-1990	08/10/2019	
2	Naseem Khan	Azizur Rahman	Abbotabad	F.A.	15-03-1965	18-02-1990	08/10/2019	
3	Alihammed Jephantze	Ali Fayaz	Rashehra	F.A.	20/09/1964	07-03-1990	28/05/2021	
4	Muniammed Riaz-II	Mir Fayaz	Rashehra	F.A.	02-03-1964	07-03-1990	28/05/2021	
5	Syed Iqbal Shah	Syed Iqbal Shah	Rashehra	F.A.	02-03-1969	07-03-1990	28/05/2021	
6	Abdul Ali	Fazluddin Ali Khan	Banru	D.Com	03-03-1969	03-03-1990	28/05/2021	
7	Waseem Rahammad	Ali Ahmad	Peshawer	F.A.	22-04-1964	08-03-1990	22/03/2022	Inter se seniority shall remain intact
8	Zafar Ali	Yar Shah	Khyber	F.A.	22-04-1964	08-03-1990	22/03/2022	Inter se seniority shall remain intact
9	Waqas Rahammad	Waqas Khan	Ghulam Rasheem	F.A.	37-10-1969	10-03-1990	28/05/2021	
10	Waqasoddin Jafri	Ghulam Haider	Swabi	F.A.	09-12-1970	16-03-1990	28/05/2021	
11	Ahsan Khan	Sardar	Charsadda	F.A.	18-10-1971	15-03-1990	28/05/2021	
12	Imtiaz Khan	Irans Khan	Mati	F.A.	02-02-1970	07-04-1990	28/05/2021	
13	Zafir Hussain	Mohammed Ayub	Peshawer	F.A.	04-05-1967	09-04-1990	28/05/2021	
14	Dera Ghazi Gul	Qasim Khan	Abbottabad	F.A.	15-04-1967	12-04-1990	28/05/2021	
15	Mohammed Rehman	Dilawar Jan	Swat	F.A.	14-04-1970	13-04-1990	28/05/2021	
16	Ayaz Hussain	Aliyah Bashir	D.I.Khan	F.A.	14-04-1970	13-04-1990	28/05/2021	
17	Deshoi Khan	Aliyah Bashir	Gul Mohammadi	F.A.	20-04-1965	16-04-1990	28/05/2021	
18	Rahammed Irfan	Suleiman Shah	Mardan	F.A.	18-03-1970	02-05-1990	28/05/2021	
19	Amin-ul-Haq	Amin-Ul-Mulk	Mardan	F.A.	11-04-1969	15-05-1990	28/05/2021	
20	Maulud Jafali	Amil-Ul-Haq	Mardan	F.A.	21-04-1964	18-09-1985	28/05/2021	
21	Abdullah Jan-II	Hafiz Attri Khan	Peshawer	F.A.	03-01-1969	07-07-1990	28/05/2021	
22	Raveed Ahmed-I	Zahrood Ahmed	Peshawer	F.A.	07-02-1970	25-02-1990	28/05/2021	
23	Khusheed Ali-Haq	Zahrood Ahmed	Mardan	F.A.	01-01-1965	07-08-1990	28/05/2021	
24	Alihammed Tariq	Fazle-e-Zar	Swai	F.A.	10-04-1971	07-08-1990	28/05/2021	

Sr.	Name of Officer	Father's name	Domicile	Qualification	DOB (YR)	Date of entry into Govt. Service	Date of Appointment to Civil Service	Remarks
25	Mohammed Iqbal	Syed Faqir Shah	Peshawar	O.Com B.A	25-02-1971	01-09-1990	22/05/2021	
26	Mohammed Imran	Faith Khan	Kohat	Matric	10-04-1970	05-09-1990	22/05/2021	
27	Mohammed Irfan	Wali Khan	Chitral	Matric	01-07-1967	08-05-1995	30/05/2022	
28	Mohammed Irfan	Gamar Ali	Mardan	Matric	10-08-1970	11-02-1990	22/03/2022	Forgone his promotion for 1st time vide his application received on 11/03/2019
29	Mohammed Irfan	Berkai Jamal	Lakki	Matric	21-10-1969	19-05-1990	22/03/2022	
30	Mohammed Irfan	Gul Sher Ali	D.I.Khan	Matric	20-07-1973	21-09-1991	22/03/2022	
31	Mohammed Irfan	Mashammud Hafiz Khan	Lakki	O.Com	20-11-1966	21-12-1991	22/03/2022	
32	Mohammed Irfan	Said Qasim	Orakzai	Matric	10-02-1971	12-09-1991	22/03/2022	
33	Mohammed Irfan	Yousaf Khan	Pannu	Matric	15-01-1972	14-09-1991	22/03/2022	
34	Mohammed Irfan	Mian Mohammad	D.I.Lawer	Matric	15-06-1971	15-03-1991	22/03/2022	
35	Mohammed Irfan	Mukarram Khan	Malgand	Matric	06-04-1971	15-03-1991	22/03/2022	
36	Mohammed Irfan	Abdul Waheed	Swabi	Matric	01-01-1969	12-03-1991	22/03/2022	
37	Mohammed Irfan	Haji Habibur Rahman	Charsadda	Matric	02-03-1972	26-09-1991	22/03/2022	
38	Mohammed Irfan	Irad Ishaq	Charsadda	Matric	22-06-1970	29-03-1991	22/03/2022	
39	Mohammed Irfan	Ziaullah	Bannu	O.Com	07-07-1973	21-12-1991	22/03/2022	
40	Mohammed Irfan	Mohammed Hanif	Charsadda	B.A	02-10-1973	24-12-1991	22/03/2022	
41	Mohammed Irfan	Fazal Ullah	Bannu	F.A	26-04-1966	07-02-1990	22/03/2022	
42	Mohammed Irfan	Rehmatullah	Peshawar	F.A	10-03-1966	01-04-1990	20/05/2022	
43	Mohammed Irfan	Akmal Hatin	Peshawar	F.A	15-10-1970	23-07-1990	20/05/2022	
44	Mohammed Irfan	Mohammed Irfan	Peshawar	F.A	21-01-1973	18-10-1993	20/05/2022	
45	Mohammed Irfan	Jehangir Khan	Peshawar	F.A	05-02-1974	12-10-1993	20/05/2022	
46	Mohammed Irfan	Zehri Dar	Peshawar	F.A	01-06-1969	10-01-1987	20/05/2022	
47	Mohammed Irfan	Gul Habib	Malgand	F.A	02-02-1973	01-11-1993	20/05/2022	
48	Mohammed Irfan	Mohamed Khan	Malgand	F.A	03-03-1973	02-11-1993	20/05/2022	
49	Mohammed Irfan	Cheh Zamir	Malgand	F.A	06-08-1974	06-11-1993	20/05/2022	
50	Mohammed Irfan	Yousaf Khan	Peshawar	F.A	15-12-1971	08-11-1993	20/05/2022	
51	Mohammed Irfan	Farid Irfan	Peshawar	F.A	07-02-1972	14-11-1993	20/05/2022	

Serial No.	Name of Person	Father's Name	Date of Birth	Qualification	Ex-B	Entered upon	Entered upon	Entered upon
						Death Certificate	Death Certificate	Death Certificate
43	Murtaza Khan	Murtaza Khan	15-01-1961	B.A.	22-12-1972	11-01-1972	05/05/2022	
44	A. Sera	Khalid Khan	01-01-1960	Kh. Ser	21-11-1965	26-01-1965	30/05/2022	
45	Mohammed Shabir	Mohammed Shabir	01-01-1960	C.Wardian	17-04-1967	16-03-1967	10/05/2022	
46	Seerat Sabir	Noor Sabir	01-01-1960	S. Waliullah	18-01-1963	20-01-1965	05/05/2022	
47	Qayyum Khan	Mohammad Ali Khan	01-01-1960	H. Waliullah	11-01-1960	10-01-1965	05/05/2022	
48	Reza Afzal	Abdul Karim Khan	01-01-1960	Mohmmad	17-01-1960	10-01-1965	05/05/2022	
49	Mohammed Iqbal	Zafar Ali	01-01-1960	Re Bano	15-01-1962	10-01-1965	05/05/2022	
50	Fazil Asif	Sarfar Aziz	01-01-1960	Jashawar	01-01-1964	10-01-1965	05/05/2022	
51	In. Asif Asif	Ila Mohammad	01-01-1960	Peshawar	21-01-1965	11-01-1965	05/05/2022	
52	Fayyaz Ahmad Afzal	Mohammed Shahid Afzal	01-01-1960	P.K. Peshawar	17-03-1964	12-03-1965	05/05/2022	
53	Asif Akbar	Asif Khan	01-01-1960	Islamabad	19-01-1975	12-01-1995	05/05/2022	
54	Izrat Khan	Suhra Khan	01-01-1960	Murree	12-11-1971	15-01-1995	05/05/2022	
55	Sarai Khan	Siddique	01-01-1960	Mohmmad	03-01-1971	15-01-1995	05/05/2022	
56	Sohail	Ishaq Gul	01-01-1960	Islamabad	05-01-1972	15-01-1995	05/05/2022	
57	Sohail Ali	Shahid Ali	01-01-1960	I.R. Kohat	11-01-1974	15-01-1995	05/05/2022	
58	Shabir Hussain	Nawab Ali	01-01-1960	Kotli	07-05-1974	18-01-1995	05/05/2022	
59	Fazil Waheed	Yar Zamir	01-01-1960	Bajaur	11-01-1976	16-01-1995	05/05/2022	
60	Shaukat Khan	Aladar Hashmat	01-01-1960	K. Mardan	10-01-1977	15-01-1995	05/05/2022	
61	Murtaza Hussain	Saifat Hussain	01-01-1960	Muttin	16-01-1964	16-01-1995	05/05/2022	
62	Auf Ali	Lameen Khan	01-01-1960	Peshawar	04-04-1967	01-02-1995	05/05/2022	
63	Mohammed Ayaz Ali	Faqir Hashmat	01-01-1960	Charsadda	07-01-1970	01-02-1995	05/05/2022	
64	Saifi Amran	Taj Girfaor	01-01-1960	Mardan	01-05-1972	01-02-1995	05/05/2022	
65	Shabir Zamir	Shah Zamir	01-01-1960	Nowshera	31-07-1971	01-02-1995	05/05/2022	
66	Kir Abbas Khan	Khan Shah	01-01-1960	Mardan	05-09-1971	01-02-1995	05/05/2022	
67	Mian Altaf	Ali Aghar	01-01-1960	Charsadda	12-03-1972	01-02-1995	05/05/2022	
68	Noor Alam Khan	Mian Khan	01-01-1960	Mardan	25-04-1972	22-02-1995	05/05/2022	
69	Imtiaz Ali	Patrat Pal	01-01-1960	Charsadda	25-05-1974	01-02-1995	05/05/2022	
70	Ahan Pakand	Noor Hassan	01-01-1960	Charsadda	12-04-1974	01-02-1995	05/05/2022	
71	Irsad Qadir	Gul Bahadur	01-01-1960	Charsadda	04-05-1974	01-02-1995	05/05/2022	
72	Abid Masood	Bahadur Khan	01-01-1960	Peshawar	24-05-1975	01-02-1995	05/05/2022	
73	Sabir Shah	Abid Mehm	01-01-1960	Peshawar	04-01-1968	02-02-1995	05/05/2022	

No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of Entry into Govt. Service	Date of Appointment to Class	Remarks
54	Sultan Zeb	Nazir Ahmad	Peshawar	M.A. (Master of Library & Information Science)	20-11-1969	07-02-1995	30/05/2022	
55	Naseem ul-Din	Tawab-ud-Din	Nowshera	M.A.	03-03-1970	02-02-1995	30/05/2022	
56	Abdulhamid Hujaj Khan	Jangrez Khan	Mardan	Matric	22-04-1974	06-02-1995	30/05/2022	
57	Faleem Siraj	Siraj Mohammad	Peshawar	B.A.	08-01-1969	08-02-1995	30/05/2022	
58	S Arshad Ali Shah	Waqif Ali Shah	Swabi	B.A.	28-03-1972	09-02-1995	30/05/2022	
59	Ali Albar	Rahmani Gul	Bunair	B.A.	30-04-1967	16-02-1995	30/05/2022	
60	Fairud Din	Jalalud Din	Chitral	Matric	16-04-1964	20-02-1995	30/05/2022	
61	Zafar Iqbal	Sadhar Khan	Dir Lower	Matric	03-03-1973	20-02-1995	30/05/2022	
62	Amer Khan	Saif-ul-Malook	Dir Lower	Matric	17-03-1974	20-02-1995	30/05/2022	
63	Ishaq-u-Haq	Faqir Mohammad	Swat	F.A.	25-04-1975	20-02-1995	30/05/2022	
64	Muhammad Aleem Khan	Daulat Khan	Dir Lower	F.A.	03-01-1970	22-02-1995	30/05/2022	
65	Muhammad Naeem	Dantek Khan	Bunair	F.A.	03-03-1972	23-02-1995	30/05/2022	
66	Nasir-ud-Din	Ghulam Nabi	Chitral	F.A.	01-03-1970	26-02-1995	30/05/2022	
67	Zafar Ali-II	Amir Khan	Malakand	Matric	05-04-1970	26-02-1995	30/05/2022	
68	Muhammad Raza	Sajidur Rahman	Malakand	Matric	01-04-1967	27-02-1995	30/05/2022	
69	Muhammad Shah	Ghulam Rabban	Swat	F.A.	01-01-1968	27-02-1995	30/05/2022	
70	Muhammad Arshad	Kamal Din	Manshera	F.A.	12-05-1972	27-02-1995	30/05/2022	
71	Muhammad Mushidaq-II	Atiz Mohammad	Manshera	Matric	20-03-1973	27-02-1995	30/05/2022	
72	Rasrat Nawaz	Abdur Rehman	Manshera	Matric	12/04/1974	27-02-1995	30/05/2022	
73	Mohammad Bakhtiar	Khanal Zaman	Manshera	Matric	27-06-1975	27-02-1995	30/05/2022	
74	Gul Alsar	Shamal Khan	Swabi	Matric	10-04-1971	07-10-1991	30-11-2022	
75	Mustafa Ahmad-II	Ali Kunbar	H.Waziristan	Matric	07-03-1965	06-11-1993	30-11-2022	
76	Nisar Ali Khan	Mohammad Aslam	Bannu	D.Com	19-09-1967	06-11-1993	30-11-2022	
77	Naseem Khan-II	Hukam Khan	Nowshera	F.A.	04-01-1973	01-02-1995	30-11-2022	
78	Muhammad Usman	Sahibzada Ahmad Gul	Charsadda	F.A.	03-04-1973	01-02-1995	30-11-2022	

No.	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
109	Nasir Muhammad Sher	Alehammad Sher	Swabi	F.A.	05-11-1957	06-01-1995	30-11-2022	
110	Sajdar Aram	Dilavar Khan	Chitral	F.A	12-12-1971	23-02-1995	30-11-2022	
111	Aurangzeb Ali	Ghulam Haider	Manshera	Matric	05-07-1975	27-02-1995	30-11-2022	
112	Syed Mushtaq Hussain Shah	All Asghar Shah	Abbottabad	Matric	20/06/1970	07-03-1995	30-11-2022	
113	Zahid Ali-II.	Sikandar Khan	Abbottabad	F.A..	02-12-1972	13-03-1995	30-11-2022	
114	Amin Ullah-II	Amir Qadir Khan	Bannu	Matric	02-03-1973	13-03-1995	30-11-2022	
115	Akbar Zamani	Gulab Sher	Karak	Matric	03-03-1974	13-03-1995	30-11-2022	
116	Hawelur Rehman	Amanullah	Dir Lower	D.Com	11/10/1968	13-04-1995	30-11-2022	
117	Saadat Ali Haider-I	Mohammad Iqbal	D.I.Khan	--	D.Com	10-10-1973	19-06-1995	30-11-2022
118	Mohammad Haleem	Mohammad Shafiq	Kohat	Matric	02-01-1969	15-02-1988	31/08/2023	
119	Mohammad Ibrar	Haiderat Yusuf	Mohmand	Matric	03-01-1965	04-02-1990	31/08/2023	
120	Xen Mohammad Khan	Mohammad Ayub Khan	Bannu	F.A	01-01-1967	25-08-1991	31/08/2023	
121	Hamood Uljeh	Naseem Khan	Khyber	D.Com	05-05-1972	01-11-1993	31/08/2023	
122	Musseem Iqbal	Mohammad Iqbal	Abbottabad	Matric	05-04-1970	26-02-1995	31/08/2023	
123	Azhammad Qasim Jan	Nir Sulem Jan	Bannu	Matric	13-04-1967	10-03-1995	31/08/2023	
124	Iqbal Khan-II	Zindaf Khan	Karak	Matric	05-08-1966	10-03-1995	31/08/2023	
125	Ghulam Qasim	Ashiq Hussain	Tank	F.A	07-04-1970	13-03-1995	31/08/2023	
126	Mamatullah Khan	Fazlullah	D.I.Khan	Matric	05-09-1971	13-03-1995	31/08/2023	
127	Tarin Jai Khan	Gu Nawaz Khan	Bannu	B.Com	18-02-1969	14-03-2005	31/08/2023	
128	Syed Sojid Hussain Shah	Syed Mohabbat Shah	Abbottabad	Matric	02/02/1971	30/03/1995	31/08/2023	
129	Shams ud Din-III	Rustam Khan	Chitral	F.A	01-06-1969	05-04-1995	31/08/2023	
130	Mohammad Ayub-V	Gul Bari	D.I.Khan	Matric	05-03-1975	05-04-1995	31/08/2023	
131	Kamran Mughal	Abdu'l Latif	Abbottabad	Matric	15-04-1975	11-04-1995	31/08/2023	
132	Kamran Jan	Lale Murad Khan	Nowshera	Matric	14-05-1971	12-04-1995	31/08/2023	

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- 1. The majority of law in Canada pronounces Canadian English as the sole official language.
 - 2. All Canadian law is in English.
 - 3. The majority of law in Canada is in English.
 - 4. Most Canadian law is in English.
 - 5. All the laws of Canada are in English.
 - 6. All the English law in Canada is in English.
 - 7. English law in Canada is in English.

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OFFICE OF THE CHIEF ENGINEER & WORKS

COMMUNICATION & WORKS DEPARTMENT

HYBER PAKHTUNKHWA PESHAWAR

No. 192-EI/542/ICEC/C&WD

Dated 02/04/2024

FINAL SENIORITY LIST

In pursuance to Section 8 (1) and (5) of the Khyber Pakhtunkhwa Civil Servants Acts 1973, read with C&W Department (Recruitment/Appointment) Rules 2010 notified vide No. SOEC&WD/8-12/2010 dated 29/03/2010, the Final Seniority List of Senior Clerk (BPS-14) in the Communication & Works Department (as stood on 31/03/2024) is hereby notified as under:

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
1	Mehar Ali Shah	Dil Afza	Tork	Metric	05-08-1981	25/05/2005	06/10/2019	
2	Sami Ullah Khan	Muhammad Yaqoob	Tork	B.Sc.(CS)	24/03/1983	25/05/2005	08/10/2019	
3	Zahid Ismail Shah	Haji Ismail Shah	Bannu	F.Sc.	10-05-1974	02-04-1995	08/10/2019	
4	Atif Iqbal	Javed Iqbal	Charsadda	Metric	01-04-1985	22-11-2006	08/10/2019	
5	Sana Ullah	Gul Roz Khan	Mardan	Metric	15-04-1988	23-11-2006	08/10/2019	
6	Muhammad Waheed Alvi	Badrshah Hussain	Malakand	Metric	35-04-1986	23-11-2006	28/05/2021	
7	Ismailullah	Kabir Khan	BL Khan	F.A	10-07-1985	24-03-2007	28/05/2021	
8	Saihar Rahman	Abdur Rahman	Mardan	F.A	14/01/1969	12/09/2007	28/05/2021	
9	Zakirullah	Fazal-e-Maula	Swabi	Metric	03/03/1991	18/10/2007	28/05/2021	
10	Anwar Zaib	Qudrat Shah	Mardan	B.A.	05-05-1972	08/02/2010	28/05/2021	
11	Syed Abdullah Shah	Syed Riaz Ullah	Charsadda	F.A	02/04/1975	08/02/2010	28/05/2021	
12	Masood Shah	Bakhmal Shah	Mardan	Metric	13/03/1979	08/02/2010	28/05/2021	
13	Akhtar Zaman	Shah Zaman	Charsadda	F.A	01/04/1995	08/02/2010	28/05/2021	
14	Zayyad	Muhammad Pervaiz	Peshawar	B.A.	11/02/1986	05/06/2008	28/05/2021	
15	Kamran Ullah	Tiba Muhammad	Peshawar	Metric M.Com	08/04/1985	08/02/2010	28/05/2021	
16	Gulshad Khan	Zarsbad Khan	Peshawar	B.A.	01/04/1986	08/02/2010	28/05/2021	
17	Iftal Khan	Sarfraz Khan	Swabi	Metric	05/04/1988	08/02/2010	28/05/2021	
18	Adnan Sher Khan	Gof Sher	Mardan	B.A.	27/04/1988	08/02/2010	28/05/2021	
19	Imran Khan	Mosiq Khan	Peshawar	B.A.	17-03-1991	08/02/2010	28/05/2021	

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
20	Izhar Ulash	Faiq Ulash	Peshawar	F.Sc	14/03/1974	03/07/1993	28/05/2021	
21	Syed Atif Muhammad Hanif Shah	Syed Shah Hussain Shah	Tank	Matriic	20/01/1976	09/07/2010	28/05/2021	
22	Aulf Hussain	Ali Qambar	Kurram	Matriic	05/05/1978	09/07/2010	28/05/2021	
23	transoor Gul	Rajhid Gul	Hoshera	Matriic	10/01/1980	09/07/2010	28/05/2021	
24	Iftilas Hussain	Fazal Hussain	Kurram	Matriic	01/03/1980	09/07/2010	28/05/2021	
25	Mishimali Ulash Khan	Fazrullah Khan	Peshawar	F.A.	07/09/1980	09/07/2010	28/05/2021	
26	Adil Hussain	Ambar Hussain	Kurram	Matriic	25/05/1981	05/07/2010	28/05/2021	
27	Ziaullah	Muhammad Yunus	Peshawar	F.A.	01/02/1984	05/07/2010	28/05/2021	
28	Adnan Ali	Abdul Aziz	Mardan	Matriic	15/03/1984	05/07/2010	28/05/2021	
29	Shahid Ali	Ghfer Ali	Charsadda	G.A	05/04/1986	05/07/2010	28/05/2021	
30	Hamid Ulash	Asmat Ulash	Nardan	Matriic	05/03/1985	05/07/2010	28/05/2021	
31	Muhammad Shafeet Khan	Abdul Hameed Khan	Laiki Harowal	B.A	15/04/1997	05/07/2010	28/05/2021	
32	Shafiqat Ulash Khan	Nasrullah Khan	Peshawar	B.A	19/07/1987	05/07/2010	28/05/2021	
33	Muhammad Tahir	Mohammad Ghani	Karak	Matriic	26/09/1987	05/07/2010	28/05/2021	
34	Mustiam Ali	Ghuliam Dall	Kurram	Matriic	05/04/1988	05/07/2010	28/05/2021	
35	Vaibeeem Ahsid	Taleem Khan	Karak	Matriic	10/04/1988	05/07/2010	28/05/2021	
36	Harra Ali	Muhammad Iqbal	Swat	Matriic	10/04/1989	05/07/2010	28/05/2021	
37	Ramees Raja	Muhammad Iqbal	Di Khan	Matriic	10/04/1989	05/07/2010	28/05/2021	
38	Saad Hay	Nisar Ahmad	Manshera	Matriic	01/07/1990	05/07/2010	28/05/2021	
39	Shah Faisal	Jalal Khan	Mardan	Matriic	12/04/1991	05/07/2010	28/05/2021	
40	Tahir Ulash	Hamidullah	Charsadda	Matriic	15/01/1978	10/03/2010	28/05/2021	
41	Syed Ihsanuddin Sheraz Shah	Syed Munawar Shah	Swabi	Matriic	15/09/1979	10/03/2010	28/05/2021	
42	Shah Irfan	Sami Ulash	Charsadda	Matriic	04/01/1981	10/03/2010	28/05/2021	
43	Maseeb Ahmad	Gul Nasir	Peshawar	Matriic	06/02/1983	10/07/2010	28/05/2021	
44	Naveed Iqbal	Faisal Wahab	Swat	Matriic	03/03/1986	10/01/2010	28/05/2021	
45	Sajid Iqbal	Muhammad Shahzad	Ajnshehra	Matriic	21-07-1974	03-01-1995	22/03/2022	

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt: Service	Date of Appointment to Class	Remarks
46	Inayat Ali Shah	Mohi Gul Hassan Shah	Bannu	Matric	31/03/1987	18/06/2010	30/05/2022	
47	Fahim Ahmad	Abdul Qayyum	Peshawar	Matric	06/01/1985	10/02/2010	22/03/2022	
48	Shahid Hussain Shah	Maroof Shah Kazmi	Abbottabad	Matric	12/12/1988	10/02/2010	22/03/2022	
49	Aslandyar Ali	Maras Khan	Nowshera	FSC	24/02/1989	10/02/2010	22/03/2022	
50	Waseem Khan	Munsif Khan	Abbottabad	Matric	05/05/1990	10/02/2010	22/03/2022	
51	Obaid Ullah	Sayyid Muhammad	Charsadda	Matric	04/04/1991	10/02/2010	22/03/2022	
52	Imran	Waris Khan	Charsadda	Matric	04/01/1979	11/07/2010	22/03/2022	
53	Asim Anwar	Almar Khan	Lakki Marwat	F.A	09/04/1986	11/02/2010	22/03/2022	
54	Habib-Ur-Rehman	Hoor Rehman	Peshawar	Matric	05/08/1982	12/07/2010	22/03/2022	
55	Waseem Yousaf Qureshi	Yousaf Qureshi	DI Khan	Matric	15/04/1984	12/02/2010	22/03/2022	
56	Shafiq Ullah Khan	Aitz-Ur-Rehman	Bannu	F.A	04/09/1985	12/02/2010	22/03/2022	
57	Tauseef Ahmad	Nihar Khan	Peshawar	Matric	04/05/1990	12/02/2010	22/03/2022	
58	Harrat Wahab	Abdul Waris	Mardan	Matric	20/04/1976	13/02/2010	22/03/2022	
59	Muhammad Ibrar Khan	Ziazu'l Gul	Mardan	Matric	05/04/1981	18/02/2010	22/03/2022	
60	Adnan Amin	Hoor-ul-Amin	Swabi	Matric	01/06/1985	13/02/2010	30/05/2022	
61	Ibrar Ullah	Mukhtiar Khan	Mardan	Matric	01/01/1990	13/02/2010	22/03/2022	
62	Farid Ullah	Nasrullah	Lakki Marwat	Matric	01/01/1979	15/02/2010	22/03/2022	
63	Niran Nawab	Nawab Khan	Lakki Marwat	Matric	06/04/1983	15/02/2010	22/03/2022	
64	Hassan Jan	Amir Nawaz Khan	Lakki Marwat	M.Cs	04/08/1987	15/02/2010	30/05/2022	
65	Harold Ullah	Abdullah Jan	Lakki	Matric	16/11/1987	15/07/2010	30/05/2022	
66	Nisar Muhammad	Bashir Muhammad	Charsadda	Matric	03/04/1983	16/02/2010	30/05/2022	
67	Muhammad Idrees	Sher Muhammad	Charsadda	B.A	15/03/1991	16/02/2010	30/05/2022	
68	Abdullah	Barkat Ali	Swat	Matric	01/08/1991	16/02/2010	30/05/2022	
69	Yar Muhammad	Bashir Ahmad	Peshawar	M.A	15/04/1974	18/02/2010	30/05/2022	
70	Suleman Khan	Khuda Baksh	Peshawar	Matric	01/01/1980	18/02/2010	30/05/2022	
71	Maqsood Anwar	Dost Muhammad	Mislakand	Matric	26/03/1990	10/02/2010	30/05/2022	
72	Alam Khan	Idress Khan	Peshawar	Matric	24/10/1978	19/02/2010	30/05/2022	
73	Noor-ul-Amin	Hajji Muhammad Amin Khan	DI Khan	Matric	24/03/1982	19/02/2010	30/05/2022	
74	Islam Noor	Muzaffar Khan	Peshawar	Matric	12/10/1988	19/02/2010	30/05/2022	
75	Muhammad Nabi	Muhammad Ghulam	Kurram	Matric	02/04/1989	20/02/2010	30/05/2022	
76	Shah Fahad	Adalat Khan	Nowshera	Matric	05/07/1985	20/02/2010	30/05/2022	
77	Zeeshan Ullah	Zakir Ullah	Lakki Marwat	Matric	09/05/1989	20/02/2010	30/05/2022	
78	Wajid Ullah	Zakir Ullah	Peshawar	Matric	05/02/1980	18/02/2010	30-11-2022	

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
79	Shams-ur-Rehman	Masood-ur-Rehman	Abbottabad	Matric	07/07/1983	22/02/2010	30-11-2022	
80	Zati Ullah	Shakir Ullah	Peshawar	Matric	14/03/1985	27/02/2010	30-11-2022	
81	Zia Ullah Khan	Sar Zamgen Khan	Nowshera	Matric	09/03/1989	24/02/2010	30-11-2022	
82	Huzail Shah	S.Umar Farooq Shah	Kohat	Matric	26/07/1988	25/01/2010	30-11-2022	
83	Miss Mahjabeen	Amir Mumtaz	Peshawar	M.A (Islamiat)	03/05/1981	01/03/2010	30-11-2022	
84	Azmat Ullah	Talwari Khan	FR Danner	Matric	24/07/1983	05/03/2010	30-11-2022	
85	Ijaz Ahmad	Muhammad Sliyyar	Peshawar	Matric	01/10/1983	12/03/2010	30-11-2022	
86	Farman Ullah Khan	Haib Mir Ali Khan	Bannu	D.Com B.A	05/02/1968	19/10/2010	30-11-2022	
87	Syed Usma Baroot Zaldi	W.D S.Saqib Hussain Shah	DI Khan	M.A	01/05/1980	15/01/2011	30-11-2022	
88	Mahboob Alam	Muhammad Ayub	Tank	F.A	07/10/1983	15/01/2011	30-11-2022	
89	Ijaz Ahmad	Wilayat Hussain	Chitral	F.A	28/07/1987	15/01/2011	30-11-2022	
90	Farhan Ullah	Aman Ullah	Peshawar	B.B.A	17/04/1988	15/01/2011	30-11-2022	
91	Muhammad Ishfaq	Malik Aman	Peshawar	F.A	02/06/1988	15/01/2011	30-11-2022	
92	Kamran Khan	Javed Khan	Mardan	F.A	07/07/1988	15/01/2011	30-11-2022	
93	Asif Ali	Abdul Aziz	Mardan	F.Sc	01/08/1989	15/01/2011	30-11-2022	
94	Hazrat Bilal	Abdur Rehman	Tank	Matric	23/03/1990	15/01/2011	30-11-2022	
95	Maisi Mehnaz	D/O Samar Gul	Peshawar	F.A	01/01/1991	15/01/2011	30-11-2022	
96	Muhammad Sadeeq Ullah	Ihsan Ullah	Peshawar	M.Com	20/04/1991	15/01/2011	30-11-2022	
97	Junaid Ali	Noor Ali	Nowshera	F.A	28/03/1992	15/01/2011	30-11-2022	
98	Masti Ullah	Abdul Baqi Jan	Lokki Marwat	Matric	14/04/1983	17/01/2011	30-11-2022	
99	Muhammad Kashif Malik	Bahadar Khan	Charsadda	Matric	02/08/1992	17/01/2011	30-11-2022	
100	Zeechan Ambar	Muhammad Ambar	Peshawar	B.A	12/01/1990	24/01/2011	30-11-2022	
101	Muhammad Younas	Sabir Gul	Mardan	Matric	14/03/1969	04/05/1987	30-11-2022	
102	Hafiz Zafar Ali Khan	Haji Noor Zai	Bannu	Matric	16/03/1969	03/03/1988	30-11-2022	
103	Mohammad Farid	Umar Ali	Dir Lower	Matric	23/02/1968	11/9/1988	30-11-2022	
104	Bahadar Shah	Sher Bahadar	Kohat	Matric	07/04/1972	16/07/1988	30-11-2022	
105	Inayatullah Jan	Saadullah Khan	Lokki Marwat	Matric	01/06/1967	02/01/1990	30-11-2022	
106	Muhammad Shoaib	Farid Hussain (Late)	Nowshera	Matric	26607	03/10/1990	30-11-2022	
107	Rafeeq Ullah	Muhammad Ismail	DI Khan	F.A	01/03/1970	04/03/1990	30-11-2022	
108	Murmat Ali	Mehrab Ali	Kohat	Matric	02/01/1972	08/07/1990	30-11-2022	
109	Muhammad Aram	Muhammad Ayaz	Swabi	F.A	02/05/1971	23/10/1990	30-11-2022	
110	Abdur Rauf	Abdul Manan	Kohat	Matric	12/07/1967	07/01/1988	30-11-2022	

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
111	Shamsul-Huda	Shah Bahawal Haq	Manshera	Matric	22/04/1970	20/09/1991	30-11-2022	
112	Fazal Hussain	Mohammed Ramzan	D.I Khan	Matric	06/05/1968	29/09/1992	30-11-2022	
113	Abdur Raziq	Fazal Raziq	Peshawar	Matric	04/05/1974	21/11/1992	30-11-2022	
114	Farman Ullah Khan	Aman Ullah Khan	Charsadda	Matric	04/06/1971	04/01/1990	30-11-2022	
115	Muhammad Tariq	Muhammad Hanif	Mardan	Matric	08/08/1969	10/02/1993	30-11-2022	
116	Shakil Muhammad	Wilsal Muhammad	Charsadda	Matric	03/02/1986	29/07/2011	30-11-2022	
117	Syed Aslam Shah	Syed Mushtaq Shah	Peshawar	Matric	19/06/1993	29/07/2011	30-11-2022	
118	Shah Zaib	Hanif-ur-Rahman	Bajaur	Matric	25/02/1993	01/08/2011	30-11-2022	
119	Muhammad Ishaq	Abdul Raziq	Peshawar	F.A.	07/04/1988	05/08/2011	30-11-2022	
120	Syed Rashid Rata	Muhammad Qasim	Peshawar	B.A.	06/06/1983	31/12/2011	30-11-2022	
121	Muhammad Khalid Rata	Kapton Khan	Takki Marwat	F.Sc	15/08/1987	31/12/2011	30-11-2022	
122	Muhammad Raees	Muhammad Jan	Tank	Matric	23/03/1990	31/12/2011	30-11-2022	
123	Zahid Iqbal	Karam Khan	Abbottabad	Matric	03/12/1970	11/04/1990	30-11-2022	
124	Sajjad Nazar	Shah Nazar	Mardan	Matric	19/04/1968	10-09-1989	30-11-2022	
125	Akhtar Ali Gul	Zara Gul	Bannu	Matric	16/09/1972	31/10/1994	30-11-2022	
126	Qaisar Iqbal	Taj Muhammad	Kohat	Matric	05/06/1973	24/01/1995	30-11-2022	
127	Ali Rehman	Patok Khan	Peshawar	F.A	01/10/1970	29/03/1995	30-11-2022	
128	Iftikhar Ali	Nawab Ali Khan	Swabi	Matric	17/03/1972	04/02/1995	30-11-2022	
129	Usman-ud-Din	Sharaf-Ud-Din	Chitral	F.A	20/03/1984	07/05/2012	30-11-2022	
130	Zulfiqar Khan	Masal Khan	Peshawar	Matric	14/10/1981	08/05/2012	30-11-2022	
131	Rohi-ul-Amin	Muhammad Yousaf	Peshawar	F.Sc	08/01/1982	08/05/2012	30-11-2022	
132	Sarfraz Khan	Jamroz Khan	Shangla	B.A	18/11/1988	08/05/2012	30-11-2022	
133	Ihsan Ullah	Gul War-Jan	Karak	Matric	27/03/1989	09/05/2012	30-11-2022	
134	Muhammad Saeed Khan Lodhi	Khan Zada Khan Lodhi	Mardan	F.A	18/04/1977	18/05/2012	30-11-2022	
135	Asif Khan	Aman Ullah	Charsadda	B.A	09/04/1978	18/05/2012	30-11-2022	
136	Misbah Ullah	Gharai Khan	Charsadda	Matric	04/02/1980	18/05/2012	30-11-2022	
137	Tariq	Kaloor Khan	D.I lower	Matric	20/02/1981	18/05/2012	30-11-2022	
138	Zakiullah Khan Bangash	Fazal Rahim	Hangu	MBA	04/05/1982	18/05/2012	30-11-2022	
139	Habib Gul	Khalsta Gul	Bajaur	M.A (Psc Sc)	04/01/1983	18/05/2012	30-11-2022	
140	Aurangzeb-V	Sheikh Mir Aslam	Mardan	M.A	11-10-1968	16-09-1991	31-08-2023	
141	Naqeeb Ullah	Payo Khan	Peshawar	Matric	19/04/1990	19/02/2010	27-10-2023	
142	Muhammad Ali Jan	Farie Subhan	Peshawar	F.A	03/03/1986	15/01/2011	31-08-2023	
143	Vad Eight	M. Nawaz Khan	Chitral	Matric	01/03/1972	30/08/1990	27-10-2023	

S.No	Name of Official	Father's Name	Domicile	Qualification	OS	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
144	Sheryar Khan	Ghulam Dawood Khan	Lakki Marwat	Matric	04/10/1992	03/08/2011	31-08-2023	
145	Shah Hussain	Abdullah Shah	Charsadda	Matric	04/02/1975	31/12/2011	31-08-2023	
146	Sakhiwal Hussain Shah	Manzoor Hussain Shah	Oil Khan	M.A	26/12/1979	18/05/2012	31-08-2023	
147	Mohammad Nadeem Khan	Mukaram Khan	Bannu	B.A	02/04/1981	18/05/2012	31-08-2023	
148	Miss Salma Irum	Din Muhammad	Kohat	B.A.	06/12/1982	18/05/2012	27-10-2023	
149	Zulfiqar Ahmad	Khan Said	Peshawar	B.A	18/07/1983	18/05/2012	31-08-2023	
150	Malik Phool Mohammad	Malik Noor-ul-Islam	Mansehra	B.A/DIT	15/02/1984	18/05/2012	31-08-2023	
151	Dr. Atiq ur Rahman	Aitz ur Rahman	Charsadda	Post DIn Management	13/04/1985	18/05/2012	31-08-2023	
152	Abid Shah	Miskeen Shah	Haripur	Matric	30/03/1986	18/05/2012	31-08-2023	
153	Wajid Khan	Mohammad Rahim	Charsadda	B.A	05/02/1987	18/05/2012	27-10-2023	
154	Kabir Ullah	Xhan Resh	Charsadda	B.A	10/03/1987	18/05/2012	27-10-2023	
155	Furhad Ali	Jehanzeb Khan	Lakki	B.A	25/03/1987	18/05/2012	27-10-2023	
156	Zalarullah	Hamid Ullah	Lakki Marwat	B.A	15/04/1987	18/05/2012	27-10-2023	
157	Muhammad Jawad Altaf	Altaf Ahmad Bismill	Peshawar	B.Com	15/04/1987	18/05/2012	27-10-2023	
158	Umar Sher	Zor Sher	Mardan	B.A	12/07/1987	18/05/2012	27-10-2023	
159	Muhammad Zeshan	Abdur Rashid Khan	Lakki Marwat	B.A	14/03/1988	18/05/2012	27-10-2023	
160	Rahid Ali Bangash	Wahid Ali Bangash	Hangu	F.A	05/04/1988	18/05/2012	27-10-2023	
161	Jibran Malik	Sher Khirab	Bannu	B.A	04/07/1988	18/05/2012	27-10-2023	
162	Abdul Hafees	Abdur Raheem	Oil Khan	B.A/DIT	09/12/1988	18/05/2012	27-10-2023	
163	Dabir Nadeem	Mohammad Asghar	Mansehra	B.A	09/01/1989	18/05/2012	27-10-2023	
164	Khayyam ur Rahman	Zia ur Rahman	Peshawar	B.A	10/01/1989	18/05/2012	27-10-2023	
165	Mohammad Shoaib	Gul Dad Khan	Kohistan	F.Sc	01/02/1989	18/05/2012	27-10-2023	
166	Arshad Ali	Nail Mohammad	Oil Upper	Matric/DAE(E)	30/03/1989	18/05/2012	27-10-2023	

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB.	Date of entry into Govt. Service	Date of Appointment to Class	Remarks
165	Nafees Ahmed Tareen	Abdul Hameed Tareen	DI Khan	F.A D.Com	06/10/1976	10/01/1995	27-10-2023	
166	Muhammad Haris	Muhammad Mujahid	Peshawar	D.A	18/03/1991	02/01/2013	27-10-2023	

Copy of the above forwarded to:-

1. The Secretary to Govt of Khyber Pakhtunkhwa, C&W Department Peshawar.
2. The all-Chief Engineers C&W Department; KP.
3. The Managing Director, Pakhtunkhwa Highways Authority, Peshawar.
4. Project Director FMR/PMU C&W Department Peshawar.
5. All the Superintending Engineers in C&W Department Khyber Pakhtunkhwa.
6. All the Executive Engineers in C&W Department Khyber Pakhtunkhwa.
7. Assistant Director IT C&W Secretariat Peshawar. He is requested to upload the same on C&W official Website. (www.cwd.gkp.pk)

CHIEF ENGINEERS CENTRE

Zahid Habib
Administrative Officer

To

D 22

Day No - 10/5/2024

1) SECRETARY,

Communication & works Department,
Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.

2) CHIEF ENGINEER (CENTRAL),

Communication & works Department,
Government of Khyber Pakhtunkhwa, Peshawar.

Through Proper Channel:

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION FOR ISSUANCE OF JOINT SENIORITY LIST OF SENIOR CLERKS AND ACCOUNT CLERKS, AS PER RULES, FOR THE PURPOSE OF PROMOTION TO THE POST OF OFFICE ASSISTANT (BPS-16).

Prayer: On the acceptance of this appeal, joint Seniority List of Senior Clerks and Accounts (BPS-14) may please be casted and issued, as per Rules, for the purpose of promotion to the post of Office Assistants (BPS-16), with such other relief, as may deem fit in the circumstances of the case, may also be granted.

Respected Sir,

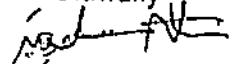
I, Imran Khan S/O Noshier Khan, Senior Clerk (BPS-14), Executive Engineer Highway Division Khyber, submit instant departmental Appeal / Representation for your honors sympathetic and benevolent consideration as under;

1. That, Appellant was appointed by the competent authority in department as junior Clerk in the year 2010 and is now performance duty as Senior Clerk (BPS-14).
2. That, as per rules of the cadre of the senior clerks and Accounts Clerks are in the same cadre and scale and there channel of promotion has also been prescribe as office assistants (BPS-16).
3. That, for the purpose of the promotion, as per rules, the concept of joint Seniority list has been inserted according to which both the cadre have equal rights quota of consideration for the promotion of the post of Office Assistants(BPS-16), on the basis of Seniority-Cum-Fitness.

- 23
4. That, unfortunately, since the issuance of amendments in the rules vide notification Dated: 25/03/2010, no joint seniority list has been issued by the department due to reasons best known to them rather than incumbents / holders of the posts of Senior Clerks are promoted to the post Accounts Clerks in same cadre / Scale, which totally against the spirit of law / rules.
 5. That, the promotion of the Senior clerk to the post of Accounts clerks does not entitle the civil servant for any increment nor the same as approved by the AGPR as valid in Lawful promotion.
 6. That, Appellant wants to be dealt-in, in accordance with the law / rules on the subject because the minimum length of service for the purpose of the promotion from Senior Clerk is five years and due to illegal promotion of Senior Clerk to the post of Accounts Clerk, he is bound to wait for another five years for the purpose of the promotion to the post of Office Assistant (BPS-16).
 7. That, according to the mandate of the rules of the subject, the Appellant does not want to promoted to the post of Accounts Clerk rather he wants to be treated in accordance with law by considering him for the promotion of the post of Office Assistant (BPS-16), subject to issuance of joint Seniority list and on the basis of Seniority-Cum-Fitness.

It is therefore, requested that departmental Appeal / Representation of the Appellant be accepted as prayed for.

Your Faithfully



Imran Khan S/O Noshir Khan

Senior Clerk

BPS-14 Executive Engineer

Highway Khyber

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

24
Misc. A. No. /2024

IN

S. A. No. /2024

Imran Khan versus Chief Engineer & Others

APPLICATION FOR DIRECTION TO
RESPONDENTS NOT TO PROCESS THE
PROMOTION CASES ON THE IMPUGNED
SENIORITY LISTS TILL THE FINAL DISPOSAL
OF THE CASE:

Respectfully Sheweth,

1. That applicant filed the subject appeal before this hon'ble Tribunal today against the separate seniority lists of Account Clerks and Senior Clerks.
2. That respondents are going to make promotions to the post of Assistant on the disputed seniority lists, so their every likelihood that the applicant would suffer and would be deprived of his due right of promotion and if such promotion was made without issuing Combined Seniority List according to rules, then the purpose of the appeal would become in-fructuous and rights of the applicant shall defeat.
3. That the applicant has a good *prima facie* case and balance of inconvenience lies in favour of the applicant and if department is not stopped from process of affecting promotion then the applicant would suffer irreparable loss.

25

It is, therefore, most humbly requested that the application be accepted as prayed for.

[Signature]
Applicant

Through

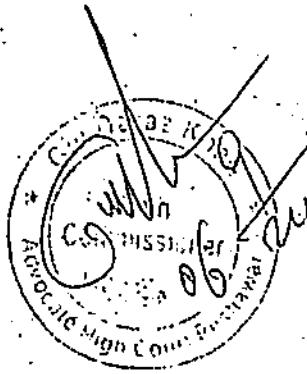
[Signature]
Saadullah Khan Marwat
Advocate

Date: 06-09-2024

AFFIDAVIT

I, Imran Khan, Applicant, do hereby solemnly affirm and declare that contents of Application are true and correct to the best of my knowledge and belief.

[Signature]
DEPONENT



✓109P

✓

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مکتبہ
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