FORM OF ORDER SHEET

Court of	· <u></u> -
Appeal No.	1625/2024

	<u>Apı</u>	eal No.	.	1 <mark>625/2</mark> 024	<u> </u>		
S.No.	Date of order proceedings	Order or other pr	oceedings with	n signaturė o	f judge		
1.	2 .			3			· · · · · · · · · · · · · · · · · · ·
							
1	27 /09/2024	T	ie appeal	of Mr. N	luhammad	Arif pro	esented
-	<u> </u>	today by Mr.	Noor Muha	ammad Kl	nattak Adve	ocate. It i	s fixed
	t :	for preliminar					
		01.10.2024. P.					
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THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. CHECK LIST

MR. MUHAMMAD ARIF

V/S

DIRECTOR LG&RDD

S NO	CONTENTS	YES	NO
1.		•	
2.	This petition has been presented by: Noor Muhammad Khattak Advocate Supreme Court Whether Course!/Appellant/Respondent/Despendent/De	1	
3.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents? Whether appeal is within time?	$\sqrt{}$	
4.	Whether the enactment under which the appeal is filed mentioned?	$\sqrt{}$	
5.	Whether the enactment under which the appeal is filed is correct?	V	2.7
6.	Whether affidavit is appended?	\perp $\sqrt{}$	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	1	
8.	Whether appeal/annexures are properly paged?	V	
9.	Whether certificate regarding filing any parties are all at		
10.	Whether certificate regarding filing any earlier appeal on the subject, furnished? Whether annexures are legible?	√ √	
11.	Whether annexures are attested?		
12.	Whether copies of approximate and all the transfer of approximate		
13.	Whether copies of annexures are readable/clear?	1	
14.	Whether copy of appeal is delivered to AG/DAG?	17	
14,	Whether Power of Attorney of the Counsel engaged is attested and signed by	1	
15.) beamen and such that the specific to the spe	"	
16.	Whether numbers of referred cases given are correct?	1	
	Whether appeal contains cutting/overwriting?	×	
17.	Whether list of books has been provided at the end of the appeal?	17	
18.	whether case relate to this court?	1	
19.	Whether requisite number of spare copies attached?	1	
20.	Whether complete spare copy is filed in separate file cover?		
21.	whether addresses of parties given are complete?	$\sqrt{}$	
22.	vyneiner index filed?	√	
23.	Whether index is correct?	$\sqrt{}$	
24.	Whether Security and Process Fee deposited? On		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Bules 4074 P. L. 44		
	- ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	1	
26.	Whether cupies of comments/reply/reiginder submitted? On		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On		
	Provided to opposite barty? On		
t is c	ertified that formalities/documentation	1	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- Noor Muhammad Khattak, ASC

Signature:	N
Dated:-	9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO__162-5

MR. MUHAMMAD ARIF

V/S DIRECTOR LG&RDD

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10.	Copies of departmental appeal and appellate order dated 19/09/2024	of departmental appeal and se order dated 19/09/2024 K&L	
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THROUGH:

APPELLANT

NOOR MUHAMMAD KHATTAK ADVOCATE SUPREME COURT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL No. 1625 -P/2024

Mr. Muhammad Arif, Village Secretary (BPS-09), O/O Assistant LG&RDD, Mardan.

APPELLANT

VERSUS

- 1- The Secretary LG&RD Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General LG&RD Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Assistant Director LG&RD Department, District Mardan.

..... RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED FINAL SENIORITY LIST CIRCULATED VIDE OFFICE ORDER DATED 08/08/2024 AND AGAINST THE APPELLATE ORDER DATED 19/09/2024 WHEREBY THE APPEAL OF THE APPELLANT HS BEEN REJECTED ON NO GOOD GROUNDS

Prayer:-

That on acceptance of the instant service appeal, the impugned seniority list dated 08/08/2024 may very kindly be set aside and the respondents may further please be directed to issue /circulate seniority list as per proviso to sub rule 4 of rule 17 of the Appointment, Promotion and transfer rules, 1989. Any other remedy which this august Tribunal deem fit may also be awarded in favour of the appellant.

R/SHEWETH: ON FACTS:



2.	That the respondent department in light of proviso of Rule 17(4) issued seniority list older in age, whereby the appellant has been placed at Serial No 39 of the seniority list of the respondent department. Copy of seniority list is attached as annexure
3.	That on the basis of the ibid seniority list, the respondent department through office order dated 08/10/2021 promoted senior colleagues of the appellant from serial No 01 to 31. Copy of Office order dated 08/10/2021 is attached as annexure
4.	That after promotion of the senior colleagues of the appellant, the respondent department once again issued another seniority list of appellant and his colleagues accordingly, whereby the appellant was placed at serial No 8 of the seniority list. Copy of seniority list is attached.
5.	That it is important to mention here that the respondent No 1 seeks guidelines from the Secretary Local Govt: Department through letter dated 07/02/2023 about the issuance of seniority of the employees. Copy of the letter dated 07/02/2023 is attached as annexure.
6.	That the respondent department without waiting for reply of Secretary about seniority issue, issued Tentative Seniority List vide order dated 09/07/2024, whereby the respondent department circulated the tentative seniority list on merit base, despite the fact that neither the selection process were carried out as per aggregate/merit nor appointment orders have been issued as per merit position of the candidates. Copies of order dated 09/07/2024 and tentative seniority list are attached as annexure
7.	That the appellant feeling aggrieved from the tentative seniority list, filed objection petition before the respondent No. 2, but of no avail. Copy of the objection petition is attached as annexure
	That where after the respondent No 3 issued final impugned seniority list through office order dated 08/08/2024, whereby the seniority of the village secretaries have been reckoned/



determined on the basis of merit position, despite the fact that prior to the issuance of the present impugned seniority list the respondents issued all seniority lists as per age wise and also promoted other senior colleagues of the appellant on the basis of the ibid seniority list prepared on the basis of age wise. Copy of the impugned final seniority list is attached as annexure... J

- 10. Hence the instant appeal on the following grounds amongst other.

Grounds:

- A. That the impugned seniority list dated 08/08/2024, & appellate order dated 19/07/2024 are against the law, facts, norms of natural justice and material on the record, hence not tenable and liable to be set aside.
- B. That the respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 04 & 25 of the Constitution of Islamic Republic of Pakistan 1973, which act is unjust, unfair and hence not sustainable in the eye of law.
- C. That the impugned seniority list dated 08/08/2024, & appellate order dated 19/07/2024 are violative of the Rule 17 (4) proviso of the APT Rules, 1989, therefore, not tenable and liable to be set aside.
- D. That the action and inaction of the respondents are discriminatory and is violative of Article 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973, therefore, not tenable and liable to be set aside on this score alone.
- E. That the respondent department are estopped by their conduct to reckon seniority on the basis of merit, because from initial appointed of the appellant till impugned seniority, the seniority

has been reckoned on the ground of older in age according to Rule 17 (4) proviso of APT Rules, 1989.

- F. That on the basis of Rule 17 (4) proviso of APT Rules, 1989, the respondent department prepared seniority lists and accordingly made promotion of the senior colleagues of the appellant.
- G. That the action and inaction of the respondents is violative of Article 38-E of the Constitution of Islamic Republic of Pakistan, 1973 as well as Section 8, 9 of Civil Servant Act as well as Rule 7 and 17 of the APT Rules, 1989.
- H. That the action and inaction of the respondents are based on malafide and arbitrary intentions, hence not tenable and liable to be set aside.
- I. That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal may kindly be accepted as prayed for.

Dated: 25-08-2024

APPELLANT

THROUGH:

NOOR MUHAMMAD KWATTAK

ADVOCATE SUPREME COURT

UMAR FAROOQ MOHMAND

WALEED ADNAN

KHANZAD OUL

CERTIFICATE:

ADVOCATES HIGH COURT

Advoca

No such like appeal is pending or filed between the parties on the subject matter before this Honorable Tribunal.

AFFIDAVIT

I, Muhammad Arif, Village Secretary (BPS-09) District Mardan, do hereby solemnly affirm and declare on oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR,

SERVICE APPEAL NO_____/ 2024
MR. MUHAMMAD ARIF V/S DIRECTOR LG&RDD

APPLICATION FOR RESTRAINING THE RESPONDENTS FROM ISSUING PROMOTIONS ON THE BASIS OF IMPUGNED SENIORITY LIST TILL THE DISPOSAL OF THE SERVICE APPEAL.

R/SHEWETH:

- 1- That the above-mentioned appeal along with this application has been filed before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above-mentioned service appeal against the impugned final seniority list circulated vide office order dated 08/08/2024, whereby juniors to the appellant i.e. younger in age have been shown senior to the appellant.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned seniority list has been issued by the respondents in utter disregard of law and prevailing Rules on the subject.

It is therefore, most humbly prayed that on acceptance of this application, the respondents may kindly be restrained from making/issuing promotions on the basis of impugned seniority list, till the disposal of the instant service appeal.

THROUGH:

NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT

AFFIDAVIT:

I, Muhammad Arif, (appellant/applicant), do hereby solemnly affirm and declare on oath that the contents of this **application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

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اشتھار برانے بھرتی ویٹج سیکرٹری برانے ویلٹ انیبر شڈ کونسل (878-07)

بخال اشترار فیر 2000 (۱۳) ۱۱۱ قازیکٹریٹ جزل کل المدیات و دیک قبل صوبہ غیر ایکوفراسورو۔ 11-04-2015 کیسٹ نیڈ الاکٹرن کے لیے اعتبار دیا مما تھا۔ امید مارمان کے قریری الیسٹ کے لیے میں ایسٹک برور کوسٹ وال معلومات ارکار الی ۔

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		() فعرق المعادة الماكال المالك الماكال			
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مِيادِي شراكظ:

(١) حدد المالي إلى الماكم المساور الدياكات

(ع) تاری الایل ما در المان بال بر موجد (Surplus Staff) کم الموتال (Adjustment) کم الموتال (Surplus Staff)

ورجيها فاعلومات في كرست كالمريشة و:

و مروز المال بعد المالية في المالية الم

و بدر في المسالم و المساول المساول

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OFFICE OF THE DEPUTY COMMISSIONER MARDAN

No._604/DC (M) Dated Mardan, the: 23/02/2016

APPPOINTMENT ORDER

Consequent upon the recommendation of the Selection & Recruitment Committee made in its Meeting held on 23-02-2016 at 10:00 am, the following persons placed on the merit list are hereby appointed as Secretary (BPS-07) of Village / Neighborhood Council as noted against their names, in district Mardan, with immediate effect, on the terms and conditions appended below:

	Name	Father Name	D.O.B	Appointed for VC/I
1	Tahir Rahman	Ghafoor Rahman	05-03-198	Į.
-2	Syed Bilawal Hussain	Syed Bashir Hussain	25-09-1990	
3	Salmanullah		1	,
4		Pir Muhammad	15-03-1993	Bakyana
· 1	Hamad Ali	Niaz Ali	20-03-1990	Manga-1
5	Muhammad Asad zia	Farman-ud-Din	05-03-1990	Manga-2
6	Muhammad Abbas	Muhammad Shafi	07-10-1988],
7	Muhammad Arif			
	Waqas Khan	Muhammad Ghawas	27-03-1989	KasKoroona-1
		Riaz Khan	21-04-1992	KasKoroona-2
	Nasir Khan	Mehraban Shah	19-01-1991	KasKoroona-3
.0	Yaseen Ahmad	Noor Muhammad	12-12-1991	<u></u>
1 /	Arshad Ali	Jan Said		Khazana Dheri-1
2 7	Fahir Hussain	_	17-03-1991	Khazana Dheri-2
		Akbar Hussain	11-02-1990	Sheikh Yousal-1
	yed Amjid Ali Shah	Syed Jamal Shah	15-08-1991	Sheikh Yousaf-2
A	mmar Hassan	Guizar Ali	23-09-1992	Bughdad Rural-1
, U	mar Hayat	Nadir Khan		
M	lubassar Shah		31-10-1987	Bughdad Rural-2
	ınid Rahman	Fazle Malik	18-03-1992	Chamtar Dheri
_ "		Kifayatullah	01-02-1991	Dagai-1
_ 1	uhammad Ismail	Sher Muhammad Khan	02-2-1993	Dagaí-2
M	uhammad Junid .	Muhammad Yaseen	<u> </u>	
Ha	bibulah	Niaz Nabi	<u> </u>	Bagh-e-Irum-1
			15-04-1986	Bagh-e-Irum-3
	mloor Khan	Abdul Sattar	01-03-1987 (hak Toru
ML	ihammad Iltaf	Muhammad Khursheed		ihawaja Rashaka

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	2.	3 Imtiaz Ali	Azizullah — 🤻	1100110	
	24	4 Hazrat Umar		10-01-19	
	25		Khan Bahadar	11-04-19	92 Khanjar
	26		Munir Khan	22-02-19	93 Maho Dheri
	L		Syed Farooq Shah	17-07-199	91 Behram Khan Killi
•	27	Sabir Khan	Momin Khan	13-01-196	19 Koragh
	28	Faiz-ul-Islam	Faiz-ur-Rahman	19-09-198	6 Chowki
	29	Naseer Khan	Jafar Khan	02-05-199	4 Ghala Dher
	30	Farhad Ali	Liaqat Ali	03-04-199	
·-	31	Raid Ali	Muhammad Ali	16-03-199	
	32	Haider Sher	Umar Sher	15-03-199	
٠,	33	: Ali-Raza	Nisar Muhammad		
_	34			15-12-1990	Bicket Gunj-1
	35	Shahan Khan Naqi Zahoor Ali	Muhammad Naqi	08-04-1994	Bicket Gunj-3
			Riqab Shah	29-04-1987	Shahbaz Garhi-1
	36	Muhammad Asif	Gulam Hussain	31-03-1991	Shahbaz Garhi-2
	37	Muhammad Zeb	Faiz Muhammad	08-04-1992	Chak Shahbaz Garhi
	38	Syed Saifullah	Syed Ahmad Hussain	30-04-1994	Mohib Banda-1
	39	Ishfaq	Nadir Khan	06-10-1981	1 11
	40	Atta-ur-Rahman	Meher Gul	04-03-1991	
	41	Sadiq-ur-Rahman	Raj Muhammad	04-01-1988	Qasim
	42	Asad Ali	Karim Khan	01-11-1990	<u> </u>
	43	Bilal Khan			Sharif Abad
-	44	Muhammad Imran	Akmat Khan	17-01-1992	Alia Dad Khel-2
-		Shah Fahad	Said Ahmad Jan	12-12-1989	Chak Hoti
	45		Gul Rahman	03-01-1988	Shahmat Pur-1
	46	Court Case			Shahmat Pur-2
	47	Ishfaq Ali	Muhammad Irshad	20-10-1994	Geeder
	48	Muhammah Haris Amin	Rooh-ul-Amin	29-04-1993	Baghicha Dheri-1
	49	Gul Taj	Zahir Taj	01-03-1990	Baghicha Dheri-2
۲	50	Imad Naeem	Fazli Naeem	03-10-1992	Garhi Dolat Zai-1
<u>י</u>	51	Akbar All	Abdul Samad	02-02-1995	
-	52	Zahoor Muhammad	Fazal Muhammad		Garhi Dolat Zai-2
Ļ	53	Salman Akhtar			Garhi Ismail Zai-2
Ľ		A-mini Sutiful	Ameeruddin	16-03-1991	Gujar Garhi-1
		- "	ž	0. /	

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54	Thsanuddin	Durbaguidia 6			
i		Burhanuddin	15-03-1990	Gujar Garhi-6	
55	Abdulhaq	Badshah Rehman	01-04-1989	Cheel-2	
56	Khalid Khan	Nawsher Khan	12-07-1987	Jehangir Abad	_
57	Mohsin Khan	Hasan khan	01-08-1991	Jamra	
58	Insanullah	Obaidullah	01-03-1989	Saro Shah	4
59	Yasir Arafat	Said kareem	04-03-1991	Shah Baig	
60	Hammad Ahmad	Husnulabrar	11-04-1992	Afzal Abad	1
61	Wasim Shah	Nadir Shah	25-04-1989	Pir Abad	1
62	Shad Muhammad Khan	Muhammad Kamai	18-03-1989	Arabi Banda	+
63	Muhammad Zeeshan	Lat Mir	20-04-1994	Seri Behiol	+
64	Sami Uilah	Sher Zada	04-08-1994	Daman-E-Koh-2	+
65	Attaullah	Fazal Rahman	01-04-1989	Daman-E-Koh-3	+
66	Adil Khan	Basheer Ahmad Khan	15-03-1992	Pat Baba-1	1
67	Ismail	Ahmad	02-02-1987	Pat Baba-2	_
6В	Imran Khan	Alam Zeb	12-04-1989	Kot Junghara-1	+
69	Abid Ali	Gulzada	20-03-1988	Kot Junghara-2	+
70	Arif	Mir Alam Khan	12-02-1991	Said Abad	-
71	Muhammad Yunus	Syed Zahir Shah	06-02-1987	Ahmd Abad	+
72	Aman Khan	Waheedullah	06-04-1989	Narai-2	╅
73	Hazrat Bilal	Fazal Badshah	15-03-1990	Fazal Abad	+
74	Mussawer Khan	Wazeer Gul	30-03-1993	Madey Baba	-
75	Muhammad Kamal Khan	Abdul Qayum Khan	30-06-1990	Tordher	
76	Yasir Khan	Sher Zameen	02-03-1987	Takkar-2	
77	Inayat Ur Rehman	Bakht Zada	30-03-1991	Dewan Khel	+
78	Aamir Zeb	Alam Zeb	25-12-1987	Parkho Dheri-1	
79	Liaqat Ali	Deedan Gul	13-02-1989	Parkho Dheri-2	
80	Mufti Nauman Sadiq	Noor Badshah	01-04-1995	Peer Sadi-1	╁┤
81	Zahid Hussain	Gul Zada	09-02-1991	Peer Sadi-2	H
82	Muhammad Ibrahim	Tilawat Khan	05-04-1991	Qutab Garh	H
83	Asad Ali	Ali Rahman	11-02-1987		H
84 1	Khalid Hameed	Fazal Gui	11-11-1987	Sher Garh-3	H
	<u> </u>				

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	85	Talmoor Shah	Wali Muhammad	23-12-198	8 Hathian-1
	86	Muhammad Farooq Shah	Muhammad Zahir Shah	20-11-1970	5 Hathian-2
	87	Sajjad Afzal	Afzal Khan	01-04-1990	Hathian-3
	88	Gul Wahab	Muhammad Yar	04-05-1993	Makory-1
,	89	Anwar Ali	Sabz Ali	15-04-1992	Makory-2
	90	Abdul Haseeb	Hazrat Umar	04-05-1993	Makory-3
	91	Numan Khan	Fazai Mir	25-03-1989	Lund Khwar-1
	92	Hafiz Janas khan	Khan Sher	01-01-1987	Lund Khwar-2
Ì	93	Ubald-ur-Rahman	Safi-ur-Rahman	15-04-1989	Lund Khwar-3
ļ	94	Fawad Ali	Imtiaz Khan	17-03-1992	<u>i</u>
Ì	95	Komail Hamza	Adam Khan	17-02-1986	Jalaia-2 Disable
ľ	96	Ihsanullah	Nadir Khan	15-01-1986	Khan Killi
ľ	97	Shafiullah	Attaullah	20-12-1987	Babozai Aba Khel
ľ	98	Niaz Muhammad	Muhim Muhammad	09-11-1985	Babozai Barat Khel
ľ	99	Asif Ali Shah	Sehat Shah	16-02-1992	Kohi Barmol-1
•	100	Muhammad Saqib Khan	Raheem Khan	15-04-1991	Mian Khan
ľ	101	Irfan Khan	Fazal Qadar	28-08-1990	Sangao
r	102	Muhammad Adil	Abdul Qadar	25-03-1992	Baizo Kharki-1
t	103	Salma Bibi	Said Nawab	05-02-1993	Baizo Kharki-2
r	104	Tausif Ali	Fareedullah	22-03-1990	Sarobi
	105	Muhammad Tahir Ali Khan	Khandali	06-10-1987	Taza Gram
	106	Muhammah Yaqub	Muhamad Ibrahim	12-01-1992	Mata Odi Gram-1
-	107	Sajjad Ali	Rahimullah	21-04-1986	Mata Odl Gram-2
;	801	Syed Inayat Shah	Mubrak Shah	09-03-1991	Shamozi-1
j	09	Talmiz-ur-Rahman	Umar Zameen Khan	20-04-1987	Kaloo
-	10	Sajid Khan	Said Zaman		
	_		Sele Californ	05-02-1990	Mian Essa
	11	Irfanullah	Khalid Khan	10-05-1994	Mianganoo Killi Disable
	12	Court Case			Zareen Abad
	13	Muhammad Zeb	Rahmani Gul	23-03-1992	Alo-1
	1	Riaz Ali Shah	Qadeem Shah	18-03-1988	Alo-2
1	15	Abdullah Shah	Mahmood Shah	20-03-1993	Peepal

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	116	Fawad Ahmad	Niaz Muhammad	16-03-19	995 Charchoor
.	117	Zahid Ali	Shafiullah	14-02-19	į ·
1	18	Ali Shah	Magsood Gul	05-06-19	1
. 1	19	Naik wali	Sher wall Khan	10-04-19	-
1	20	Farooq Badshah	Salih Badshah	15-08-19	
1	21	Sajjad Ali	Ayed Hussain		
1	22~	Muhammad Islam		15-01-199	
<u> </u>	23	Asif Khushal Khan	Anwar Zeb	05-05-199	3 Katlang-3
12		Shah Falsal	Khushal Khan	22-04-198	9 Katlang-4
			Sarzamin Khan	19-04-199	0 Katti Garhi
12		Syed Waqas All Shah	Syed Ghaffar Shah	30-04-198	6 Shero-2
12		Zul Qamain Ahmad Qurashi	Habib Muhammad	01-03-199	1 Jamai Garhi-1
12	7	Umair	Shah Jehan	15-10-1988	Jamal Garhi-2
12	8	Sajid Ali Jan	Allah bakhsh	12-04-1988	Rustam-1
129	9	Abrar Ahmad	Pazir gul	12-02-1991	
130	<u> </u>	Muhammad Abbas	Zahid Gul	10-01-1992	
131	ı E	Bilal Khan	Alam Zeb Khan	15-01-1993	
132	1 5	hahid Hussain	Shahbaz Khan		
133		jmal khan	Umar Khan	01-01-1992	
134	- M	uhammad Asghar Khan		02-01-1988	
135		uhammad Arif	Gul Rosh	12-04-1990	Ali
136		ubbasir Khan	Fakhruz Zaman	04-04-1991	Сћеела
137			Bakhtaj	05-09-1993	Jalal Dolat Zai
	<u>ا</u> ـــ	aqas Khan	Shehreyar	07-03-1992	Machai
138		roz shah	Syed Zahir Shah	02-04-1985	Taja
139	Įп	eran Khan	Hussain Muhammad	10-04-1992	Kher Abad
140	Та	rlq Shah	Said Wall shah	22-06-1990	Bilandi
141	Sy	ed Feroz Shah	Syed Jamai Shah	25-04-1992	Sawal Dher-2
142	Mu	hammad Shafiq	Mîr Zaman	03-10-1988	<u></u>
143	Mu	hammad Sajjad	Amir Wahab	<u> </u>	Babani
144,	Ŀ.	z All	Muhammad Tahir	03-03-1989	Bakhshali-2
145		nammad Salman		01-06-1990	Bala Garhi-1
146			Hussain Khan	24-01-1989	Bala Garhi-2
		241 (VD3):	Haji Səbir Ali	02-02-1995	Cham Dheri
			9		

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147	Muhammad Wagas	Shelkh Muhammad		
148		Yousaf	20-02-1996	5 Fatima-1
		Gul Rahman	01-07-1991	Fatima-2
149	Amin-ul-Haq	Mumtaz Khan	30-05-1992	Hamza Khan
150	Ibadullah	Darwish Khan	04-06-1993	4
151	Hamair Ali	Gul Sher	04-04-1991	
152	- Muhammad Sahib	Namoos Khan	05-01-1994	
153	Amir Seeyab Yousaf	Haji Mir Zaman		Bahi Khan
154	Habibullah		14-04-1988	Gujrat-2
155	Shakoor Khan	Kifayatullah	08-05-1992	Jungara
		Gulzar Muhammad	20-03-1991	Barikab
156	Safarish Khan	Abdullah	04-03-1994	Katakhat
.57	Muhammad Tayyab	Shamshad Khan	02-04-1986	Kotarpan
58	Basit Ali	Muhammad Ali	29-04-1995	ChaK Mardan-1
59	Shams-ul- Islam	Taj Muhammad	20-04-1987	Chak Mardan-2
60	Hussain Muhammad Irshad	Zahir Shah	04-05-1988	Mardan Rural-1
51	Zakir Khan	Taza Gul		
52	Wajid Khan	Muhammad Umar Khan		Mardan Rural-2
	Sajjad Khan		<u> </u>	Par Hoti-2.
	antion Wildil	Abdur Rahman	25-04-1993	Par Hoti-3

Terms and Conditions:

- 1. Their services shall be governed by rules / prescribed Policy of the Government.
- 2. They will be considered on probation for a period of one year which may be extended for further one year. During the probation period, their services are liable to be dispensed without assigning any reason or notice, if their performance was not found up to the mark.
- 3. This offer of appointment is subject to verification of their academic credentials/ Degrees, certificate etc. from the concerned recognized Board/ Institute/ University etc. If any of the credentials of a person are found fake, his appointment will liable to be cancelled. Moreover, necessary legal action would also be initiated against him.
- 4. Health and age certificate issued by the medical superintendent DHQ Hospital, Mardan be produced before joining the post.
- 5. Every candidate will have to produce an affidavit on stamp paper of worth Rs. 500/---- that the candidate belongs to the same VC/NC in which he/she is appointed.
 - 6. Any other law, rules or instructions issued from Government from time to time would also be applicable.
 - 7. If the above offer is accepted, you should report to the office of Assistant Director, Local Govt: & Rural Development Department, Mardan within fifteen days of the issuance of this office order, otherwise the offer will automatically stand cancelled.

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Deputy Commissioner/ (Chairman S & R Committee) Mardan,

Endst. Even No. Date: Copy is forwarded to the:

- The Secretary to Govt: of Khyber Pakhtunkhwa, Local Govt. Elections & Rural Development Department, Peshawar.
- 2. The commissioner Mardan Division, Mardan
- 3. The Director General, Local Govt. & Rural Development Department, Khyber Pakhtunkhwa, Peshawar.
- 4. The PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
- 5. The PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 6. The Section Officer (Establishment), Local Govt. & Rural Development Department, Kinyber Pakhtunkhwa, Peshawar.
- 7. The Medical Superintendent DHQ Hospital Mardan.
- 8. The District Accounts Officer, Mardan.
- 9. Assistant Director, Local Govt. & Rural Development Department, Mardan.
- 10. All concerned for compliance.

Assistant Director (LG&RDD) (Secretary S & R Committee) Mardan.

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Local Govt and RDD Mardan

		_ <u> </u>			1000 001	•		
		Final	Seniority List of	Junior Secretari	es (Bh2-0a)	lo		-].
T 21-	Name	Father Name			Current Post	Appointed as Secretary (BPS-71 on 24,12,2011	
		Riaz Ahmad	13/04/1990	24/12/2011	24/12/2011	Appointed as Secretary (8PS-71 no 23.02.2015	
	Muhammad Fatoo Shah	Muhammad Zahir Shah	20/11/1976	23/02/2016	23/02/2016	Appointed as Secretary	BPS-71 on 23-02.2016	
		Nadar Khan	10/06/1981	23/02/2016	21/02/2016	Appointed as Secretary	8P\$-7[m 23.07.2016	
		Syed Zähir Shah	02/04/1985	23/02/2016		Appointed as Secretary	HPS-7100 23.02.2016	1:
		Muhim Muhammad	09/11/1985	23/02/7016		Appointed as Secretary	BOC71 on 23.02.2016	
ļ	1 1102	Nadar Khan	15/01/1986	23/02/2016		Appointed as Secretary	PP\$7100 73 02 2016***	117
	11112401 02011	Adam Khan	17/02/1986	23/02/2016		Appointed as Secretary	(BDS-7) 00 7 3 07 2016	
		Gul Záda	20/03/1995	23/02/2016	23/02/2010	Appointed as Secretary	(BPS-7) on 23 (7) 2016	
	AUA N	Niaz Nabi	15/04/1986		23/02/2010	Appointed as Secretary	(BPS 7) 00 73 07 2016	P.
	I I LANGE OF THE L	Syed Ghafar Shah	30/04/1986	23/02/2016		Appointed as Secretary	(DDC.1160 23 07 2016	
_	121-2-1-2	Faiz Ur Rahman	19/09/1985	23/02/2016		Appointed as Secretary	(DOC 71 on 73 07 2015	
	Fatz Ultslam	Khan Sher	01/01/1987			Appointed as Secretary	(DOS 7) 79 M 2016	
	Janas Khon	Ahmad	02/02/1987	23/02/2016		6 Appointed as Secretary	(DOS 7) 32 03 7016	 ∤
13	Ismail	Sald Zahir Shah	05/02/1987		23/02/201	6 Appointed as Secretary	(B)>/(a) 23.022010	
14	Muhammad Younzs		11/02/1987		23/02/201	6 Appointed as Secretary	(895-7) on 23.02.2016	
15	Asad All	All Rahman	01/03/1997		5 23/02/201	6 Appointed as Secretary	(BPS-7) on 23.02.2016	
16	Talmur Khan	Abdul Satter	02/03/1987		5 23/32/201	6 Appointed as Secretary	(BPS-7) on 21.02.2016	
17	Yask Khan	Sher Zamin	20/04/1987		5 23/02/201	6 Appointed as Secretary	(BPS-7) on 23.02.2016	
18	Sejied Khan	Abdur Rahman	12/07/1987		6 23/02/201	6 Appointed as Secretary	(BPS-7) on 23.02.2016	
19	Khalid Khan	Nowsher Khan	31/10/1987	- 4-0 (2-0)	6 71/02/201	6 Appointed as Secretary	(BPS-7) on 23.02.2016	
20	Umer Hayat	Nadir Xhan	20/12/1987	- 1	6 23/02/203	6 Appointed as Secretary	(BPS-7) on 23.01.2016	
21	Shall Ullish	Atta Ullah	25/12/1987		6 23/02/201	6 Appointed as Secretary	(BPS-7) ari 23.02.2016	
22	Amk Zeb	Alam Zeb	02/01/198	·	6 21/02/201	6 Appointed as Secretary	(BPS-7) on 23,02,2016	
23	Almai Khon	Umar Khan	01/03/198		6 23/02/201	6 Appointed as Secretary	(BPS-7) on 23.02.2016	
24	Shah Fehad	Gul Rehman		<u> </u>	6 23/02/201	6 Appointed as Secretary	/ (BP\$-7) on 23.02.2016	
25	Muhammad Shafiq	Mir Zaman	10/03/199		6 23/02/201	6 Appointed as Secretary	(BPS-7) on 23.02.2016	~#\dv
26		Qadeem Shah	18/03/198		6 23/02/70	E Appointed as Secretary	y (BPS-7) an 23,02,2016	(24)
27		Fazal Muhammad	31/03/198		6 23/07/20	Appointed as Secretar	y (8PS-7) on 23.02.2015	
28		Ra] Muhammad	01/04/198			16 Appointed as Secretar	y (BPS-7) on 23.02.2016	
29		Zahir Shah	06/04/198		23/02/20	16 Appointed as Sevetar	y (BPS-7) on 23.02.2016	
X 30		Allah Bakhsh	12/04/198			16 Appointed as Secretar	y (875-7) on 23.02.2016	
31		Magsood Gul	- 05/01/198			16 Appointed as Secretar	y (BPS-7) on 23.02.2016	
ol 32		Aziz Ullah	10/01/198			16 Appointed as Secretar	y (8PS-7) on 23.02.2016	
33		Momin Khan	13/01/198			16 Appointed as Secretar	y (875-7) on 23.02.2016	
<i>}</i> ∹		Hussain Khan	24/01/198			16 Appointed as Secretar	y (BP5-7) on 23.02.2016	
	i Liagat Ali	Ocedan Gui	13/02/19		16 23/02/20	TO Appointed as Secretary	y (8/3-7) on 23-02-7015	=
-		Amir Wahati	03/03/198			16 Appointed as Seretar	▼ (RPS-7) on 23.02.2016	
1 31			25/03/19/					

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			- Float	-2461 (10)	of lucio Control Margan	
	S.	No Name	Father Name /	Seniority List (or Junior Secretaries (RPS-09)	
		8 Numan Khan	Fazál Mir	Date of Birth	Appointment Date Current Port In-	
	14	9 Multammad Art	Mohammad Ghawas	25/03/1989	- Transaction 45/02/2010[ACIDINITED for Consider Tributes 3	
		O' Aman Khan	Waheed Ullah	27/03/1989		- 6
	4	1 Nati Wali	Sher Wall Khan	06/04/1989		•
	. 4		Alam Zeb	10/04/1989		
١	4		Salf Ur Rahman	12/04/1989	23/02/2016 23/07/2016/63-43/07/2016	÷
_	4			15/04/1989		
•	4:		Khilishal Khan	22/04/1989	23/02/2016 23/02/2016 Appointed at Serrity 2006 19 2016	_
I	44		Nadar Shah	25/04/1989	23/02/2016 23/02/2016	
	47		Said Ahmad Ian	12/12/1989		
	48		Muhammad Tahir	06/01/1990	23/02/2016 23/02/2016 Appendix 4 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
	49	Tetis Hussain	Sáid Záman	05/02/1990	I. Sedelary (Rec/1) 2017 Avis 2017	
	50		Akbar Hussain	11/02/1990		\Box
	51	 	Zahir Taj	01/03/1990		_]
	52	Ihaan Uddin	Farman	05/03/1990		
	53	Hamad All	Burhan Ud Din	15/03/1990		
	54		Niaz Ali	20/03/1990		
	55	Farted All	Affal Khan	01/04/1990]
	56	Muhammad Asghar Khan	Uaqat Ali	03/04/1990]
	57	Tart Shah	Gul Ròsh	12/04/1990	The state of the s	_]_
	58	Irfan Khari	Said Wali Shah	22/06/1990		
	59	Syed Bilawal Hussaln	Fadi Qadar	28/08/1990		7
	60	Ali Raza	Syed Bashir Hussain	25/09/1990		7
	61	Jáfar Khan	Nisar Muhammad	15/12/1990		7
	62	Nast Khan	Gul Rehman	07/01/1991		1
	63	Junald Ur Rehman	Mèhraban Shah	21/01/1991		7
	64	Zahid Hussain	Kifáyat Ullah	01/02/1991		1
	65	Muhanmad Arif	Gul Zada	09/02/1991	TOTAL CONTROL OF THE PROPERTY	1
	66	Abrar Ahmad	Mir Alam	12/02/1991		1
ĺ	67	Salman Akhtar	Pazir Gui	12/02/1991		1
i		Zakir Khan	Amir Ud Din	16/03/1991	23/04/2010 AppOinted as Secretary (AppC7) 22 m 20 cc //	1
		Arshad Ali	Taza Gul	17/03/1991		łν
ı		Inayat Ur Rohman	Jan Sald	17/03/1991	201027 2010 Appointed as Secretary (Apolitical 2010)	F-
ł	71	Muhammad Asii	Bakht Zada	30/03/1991		l
4	=	Atta Ur Rahman	Chulam Hussain	31/03/1991	25/02/ 2016/Appointed as Secretary (RPS-7) on 23 m 2016	
F	73	Мићапитад Алу	ਅਦੀਵਾ ਓਂਗ	03/04/1991	2019 COLUMN CONTRACTOR DE CONT	\vdash
ł		Hamzir Ali	Fakhruz Zaman	04/04/1991	-77 - 47 2010 13/02/ 2010 Appointed at Secretary (Appoint	_
Ļ		TIMER AD	Gul Sher	04/04/1991	20/02/2010/Appointed at Secretary (Appoint the contraction)	1
		•	·		23/02/2016 23/02/2016 Appointed as Secretary (BPS-7) on 23.02.2016	
					, ————————————————————————————————————	

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Name Muhammad Ibrahlm	Father Name	Seniority List a	t and RDD Marda	1222	
Mithammad Ibas Li	resist manie		SCC 6121	162 (Rh <i>e</i> wo)	· · · · · · · · · · · · · · · · · · ·
THE TOTAL PROPERTY.	Tilawot Khan	Date of Birth	Appointment Date	Comme Co.	Ta
Muhammad Saqib Khan		05/04/1991	23/02/2016	32 402 /204 c	Remarks /
1 No. 1		15/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2015
Syed Amild All Shah		01/08/1991	23/02/2016	23/02/2016	Appointed as Secretary (895-7) on 23,01 2016
raseen Ahmad	Syed Jamal Shah				
Shahid Missaula	Roof Muhammad	12/12/1991			(AMPRODUCED SIX ARCODING AND DE CONTEST AND DECONTEST AND DECON
July 1033814		01/01/1995			Proposition of Appendix Francisco Proposition Control Proposition Control Proposition Prop
Arbari maa Junald	Muhammad Yascen				
renammad Abbas	Zahlo, Gul	10/01/1605			
unammad Yaqub	Muhammad Ibrahim	10/01/1992		23/02/2016	Appointed as Secretary (BPS 2) driv13.02:2016
ilal Khan	Akmal Khan	12/01/1992	23/02/2016	23/02/2016	Appointed a state of the state
sil Ali Shah		17/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 25.02.2016
5085 Khan			23/02/2016		12/2/11/11/11/11/11 14/2/11/11/11/11/11/11/11/11/11/11/11/11/1
rad Nacem					
iii Khan		10/03/1992	23/02/2016		
	assur Anmad Khan	15/03/1992			MANAGER AS SECRETARY (DOC 1)
thanna Ch. t					DUUINIED DE SOCIETATION / ORE TO STATE OF THE STATE OF TH
	Abdul Qadir				
144	Falz Muhammad				PROPERTY AS APPROXIMATIONS TO A A A A A A A A A A A A A A A A A A
	Russaln Muhammad				PUULITIED 35 (Printsee (One 3)
oat Owar	Khan Bahadar		23/02/2016	23/02/2016 A	pointed as Secretary (8PS-7) on 23.02.2016
rar All	Sabz All		23/02/2016	23/02/2016 Ar	pointed as Secretary (875-7) on 23,02,2016
ças Khan			23/02/2016	23/02/2016 45	pointed as Secretary (8PS-7) on 23.02.2016
d Feroz Shah					PULLED HAS SPECIAL PORT IL A. A
n UI Hag		25/04/1992			
ib Uilah		30/05/1992			MUTHICIDES SPECIAL PROPERTY - A A CASA
K		05/08/1992			POINTED AS SPITATORS (DDC 1)
					PUINCED 25 Secretary (differ a)
04 Ch a					
d. b. c.					
aan Shah M	whammad Shah				
Ullah In					
Vahab T	uhammad Yar		23/02/2016 2	3/02/2016 App	ointed as Secretary (BPS-7) on 23.02.2016
Maseeb ii.	Itrat Umar		23/02/2016 2	7/02/2016 Ann	Digited at 5-2007 (HPS-7) on 23.02:2016
Minari Islam					
ssic Khan				· · · · · · · · · · · · · · · · · · ·	WILLER AS DELTAINED FROM TO
- 1/2		05/09/1993			United as permetant (DOC 7)
, IMI	Allammad Nagi	08/04/1994		A A TO TO INCHES	Dinted as Secretary (BPS-7) on 23.02.2016 Dinted as Secretary (BPS-7) on 23.02.2016
				772/7U]Filena	alead
	Wahsin Khan Syed Amjid All Shah Syed Amjid All Shah Syed Amjid All Shah Syeen, Ahmad Shahid Hussein Shahid Hussein Shahid Hussein Shahid Hussein Shahid Khan Sil Ali Shah Saas Khan Sil Ali Shah Saas Khan Sil Umar Sar Ali Sas Khan Sil Umar Sar Ali Sas Khan Sil Umar Sar Ali Sas Khan Sil Umar Shahid	Wahsin Khan Hassan Khan Syed Jamai Shah Syed Amjid All Shah Syed Jamai Shah Syed Jamai Shah Syed Jamai Shah Hassen Ahmad Rhor Muhammad Yaseen Wahammad Junaid Muhammad Yaseen Wahammad Abbas Zahid, Gul Wahammad Yaqub Muhammad Ibrahim Iali Khan Ahmai Khan Sehat Shah Sehat Shah Sehat Shah Sasas Khan Sheryar Ad Nacem Fazil Nacem Iashir Ahmad Khan Massar Shah Fazic Malik Imitaz Khan Massar Shah Fazic Malik Imitaz Khan Gul Imitaz Khan Hussah Muhammad Adii Abdul Qadir Imitar Khan Hussah Muhammad Iali Umar Khan Bahadar Iali Umar Khan Bahadar Iali Umar Khan Riaz Khan Iasa Kha		Websin Khan 15/04/1991 23/02/2016 Syed Amjid All Shah 9yed Yamjid Shah 01/08/1991 23/02/2016 Syed Amjid All Shah 15/08/1991 23/02/2016 23/02/2016 Asasen Ahmad Moor Muhammad 12/12/1991 23/02/2016 Ashid Husain Shah Baz Khan 01/01/1992 23/02/2016 Whammad Junald Muhammad Yacen 03/01/1992 23/02/2016 Whammad Yaqub Muhammad Ibrahim 12/01/1992 23/02/2016 Lai Khan Akmid Khan 17/01/1992 23/02/2016 Lai Khan Akmid Khan 17/01/1992 23/02/2016 Lai Khan Akmid Khan 17/01/1992 23/02/2016 Lai Khan Sheryar 07/03/1992 23/02/2016 Lai Khan Bashir Ahmad Khan 15/03/1992 23/02/2016 Lai Khan Bashir Ahmad Khan 15/03/1992 23/02/2016 Lai Khan Bashir Ahmamad Khan 15/03/1992 23/02/2016 Lai Khan 10/03/1992 23/02/2016 18/03/1992 23/02/2016 La	Websin Khan 15/04/1991 23/02/2016 23/02/

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Local Govt and RDD Mardan

<u> </u>	<u> </u>	Final S	eniority List o	of Junior Secretar	les (BBC 00)	
	No Name	Legies (ABING	Date of Birth	Appaintment Date	Cumaros	In the second se
14:	2 Muhammad Zeeshan	Lal Mir	.20/04/1994	23/02/2016	23/03/2016	Kemarks
	3 Muhammad Sahib	Namoos Khan	01/05/1984		23/02/2016	Appointed as Secretary (BPS-7) on 23.02:2016
[1]	1	Jaiar Khan	02/05/1994			Appointed as Secretary (BPS-7) on 23.02.2016
	5 Irfen Ullah	Khalid Khan	10/05/1994	23/02/2016		Appointed as Secretary (BPS-7) on 23.02:2016
	6 Sami Ullah	Sher Zada	04/08/1994	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016
17	7 Faroog Badshah	Saleh Badshah	15/08/1994	23/02/2016		Appointed as Secretary (8PS-7) on 23:02:2016
	8 Ishfaq Ali	Muhammad Irshad	20/10/1994		23/02/2016	Appointed as Secretary (BPS-7) on 23 no 2016
11	11.4000	Sabir All	02/02/1995	23/02/2016	. 23/02/2006	Appointed as Secretary (RPS-7) Michael Aviance
120		Abdul Samad	02/02/1995	23/02/2016	. 23/02/2016	Appointed as Secretary (BPC71 No.12 no.2016
12	- I A strilled	Nlaz Muhammad	16/03/1995	23/02/2016		Appointed as Secretary (RDS-71 AA-75.07 2016
	Noman Sediq	Hoor Badshah	01/04/1995	23/02/2016		Appointed as Secretary (App. 71 Apr. 22 m. 2016
	Basit Ali	Muhammad Ali	29/04/1995	23/02/2016	<u> </u>	Appointed as Secretary IRPC 71 AP 7700 2016
	Sajod Ali	Syed Hussain	15/01/1996	23/02/2016	23/02/2010	Appointed as Secretary (App. 7) white your your
125	Muhammad Wagas	Shelkh Muhammad Yousaf	20/02/1996	23/02/2016	73105 40TDI	PPOUNDED AS Secretary (RDC.7) AN 17 or 18 or
	Wajid Ali	Ali Haider	10/02/1987	23/02/2016	_ 53105\ 5019\	PPOMIED as Secretary (ADC 7) on 12 pg 200 c
127	Zakir Khan Bacha	Muhammad Umar Khan	13/02/1990	02/05/2016	<u> </u>	Appointed as Secretary (App. 7) on 67 or 7010
.128	Muhammad Anas	Mukhtiar Hussain	04/02/1991	20/05/2016	TOTON SOTOL	oppointed as Secretary (8PS-7) An 20 hs 2016
	Khaista Rahman	Multan	02/03/1991	20/05/2016	<u>*u/u</u> 3/	ppointed as Secretary (ADC 1) no to de toute
	Muhammad Ali	Taj Wall Shah	31/03/1991	20/05/2016	_20/05/2016 A	ppointed as Secretary (APS-7) on 20 ps 2016
	Shawkar Ali	Shah Pasand Khan	13/04/1991	20/05/2016		PPOINTED 25 Secretary (RPS-7) on 20/05/2016 17
132	Fida Muhammad Khan	DA bejjeZ	22/01/1992	20/05/2016	20/03/2016 A	ppointed as Secretary (BPS-7) on 20 00 2010
	Shah Faisal	Akmal Khan	01/02/1992	20/05/2016	20/03/2016 A	ppointed as Secretary (BPS-7) on 20 os both
	Muhammad Ubaid	Muliammad Afsar	01/04/1992	20/05/2016	ZU/US/ ZU 16/A	ppointed as Secretary (BPS-7) on 20 october
	Jamil Khan	Muhammad Khan	10/02/1994	20/05/2016	20/03/2016 A	ppointed as Secretary (BPS-7) on 20 do 2015
	Liagai Shah	Sarfaraz Khan	05/11/1994	20/05/2016	10/03/2019 V	pointed as Secretary (BPS-7) on 20'05 7015
	Noman Jamel	Jamal Abdul Nasir		20/05/2016	20/05/2016 A	pointed as Secretary (BPS-7) on Artist and c
138		Amin VI Haq	01/08/1995	20/05/2016	50/02/5019[VI	pointed as Secretary (RPS-7) nh/20 of 2016
139		Anwar Ul Haq	30/03/1991	23/05/2016	<u> </u>	pointed as Secretary (BPS-7) on 23 or 2016
140	0	Feroz Shah	23/05/1993	25) 03/2017	TOTAL SOTUTE	pointed as Secretary (RPS-7) on 15 no 2017
141	Jehangir Shah	Maroof Shah	17/01/1990	23/03/202/	<u> 43/03/</u> 2017 Ap	pointed as Secretary (APS-7) on 25 on 70 in
142		nayat Ali Shah	05/01/1989	*27/02/2010	43)04/ 4UIDIND	Pointed as Secretary, 1990 of the parties
143		HOYSE AN SHEET	02/05/1998	30/11/2018	30/11/2018 Ap	pointed as Secretary (BPS-9) on 30.11.2018
143	Mohib Ullah	Hamish Gut	4555		[77]	Production (Apc. 6) on the total
		72111211 301	15/03/1971	02/06/1990	30/04/2019 Ap	pointed as Naib Qasid (BPS-1) on 01.06,1990
154	AVSING TRUSSON	agir Hessain				MINOREU W SECTELARY (BPS-4) for 20 for 20 for
		040.1003/000	03/04/1974	25/07/1993	30 /0 4/2019 Ap	pointed as Naib Qasid (BPS-1) on 25.07.1993
						2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2

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S.No	Name	Father Name	Ores desi	of Junior Secretari		• • • • • • • • • • • • • • • • • • •
		TO THE TABLE	Uste of Birth	Appointment Date	Current Post	
145	Dil Raj Khan	Shamshad Khan	12/04/1973	16/03/1994	30/04/2/019	Promoted to Secretary (BPS-9) on 30.04.2019 Adjusted as Nafb Clasid (BPS-1) on 12.12.2061
145	Zakir Muhammad	Jamshid Muhammad	27/02/1969	1000		Appointed as Chowkidar (Temp) on 16.03 1994 Promoted to Secretary (APS 3), on 30.04.2019 Appointed as Chowkidar (APS 17 on 18.05 1994
147	Muhammad Salim	Muhammad Rahim	12/07/1971			From oted to Secretary (885-9) on 30,042015
48	Muhammad Zaman	Muhammad Aslam	04/02/1983	01/01/1995 20/10/2005	40/04/2019	Appointed as Lab Atlandant (Temp) on 07 01, 1995 Promoted to Secretary (825-8) on 30 of 2019
T.	Bashir Muhammad	Dilawar Khan	20/04/1977	22/04/2013		Appointed as Naib Gasid (BPS-I) on 20,102005 Promoted to Secretary (BPS-II) on 30,04201일 Appointed as Naib Clasid (BPS-I) on 22,042013
51 T	Umar Faroog	Saif Ur Rehman	11/02/1992	22/04/2013	30/04/2019	Promoted to Secretary (825-9) on 30:04:2019: Appointed as Naib Oasid (825-1) on 22:04:2013
57	Muhammad Mustafa Sami Uttah	Miraj Muhammad	02/10/1977	03/04/2015	30/04/2019	Promoted to Secretary (BPS-9) on 30.04.2019 Appointed as Nailo Clasid (BPS-9) on 03.04.2015 Tramoted to Secretary (BPS-9) on 30.04.2019
	arhad Ali	Aman Ullah Khari Raham Sala Khan	11/05/1979	03/04/2015	_30/04/2019 A	Ppointed as Naib Casid (BPS 3) no na habite
	htisham	Noor Ul Hag	03/02/1985	05/07/2019	U5/U//2019 A	oppointed as Secretary (BPS-9) on US 07 2010
_	an Muhammad	Shams Ul Qamar	20/08/1987	05/07/2019	U5/U//2019 A	ppointed as Secretary (BPS-9) on OS 02-7019
	Auhammad Imran	Muhammad Parvez	15/01/1989	05/07/2019	U5/0//2019 A	oppointed as Secretary (BPS-9) on OS 07 2010
	alad	Aman Ullah Khan	03/03/1990	05/07/2019	<u>05/0//2019</u> [A	oppointed as Secretary (BPS-9) on OS 072010
-	ibghat Ullah	Jala Ud Din	05/03/1992	05/07/2019	U5/U7/2019 A	ppointed as Secretary (BPS-9) on (IS 07 2010
	bdul Naeem Khan	Abdul Qayum Khan	09/03/1992	05/07/2019	U5/U//2019 A	ppointed as Secretary (BPS-9) on OS 07.3/NO
	luman	Ghulam Rasool	03/04/1993	05/07/2019	05/0//2019 M	populated as Secretary (8PS-9) on the interval to
	ashan Ali	Ehsan Ali	25/04/1993	05/07/2019	05/0//2019 A	ppointed as Secretary (BPS-9) on OS no 2010
2 V	Visal Muhammad	Gul Nabl	01/09/1993 05/03/1994	05/07/2019	05/0//2019 A	ppointed as Secretary (BPS-9) on OS 07 281 o
3 F	arhad Ali	Murad Ali	06/02/1995	10/07/2019	U5/U//2019 Ap	ppointed as Secretary (BPS-9) on OS OZ (O) o
	mair Khan	Siral Ur Rehman	07/04/1995	03/07/2019	O2/0//2019 At	ppointed as Secretary (BPS-4) on OF no 2010
5 M	luhammad Talmoor Khan	Gul Bahadar	17/05/1999	03/07/2019	O5/0//2019 Ap	prointed as Secretary (BPS-9) on OF 07 2019
6 M	luhemmad Abbas Khan	Zulfigar All	02/02/2000	05/07/2019	U5/U7/2019(Ap	pointed as Secretary (RPS-9/on OS or 2010
7 S:	adam Hussain	Rahim Gul	25/04/1996	22/07/2019	22/07/2019 Ap	projected as Secretary (RPS-01 on 2.2 or 2010
	hoor Khan	Hukam Khan	02/03/1995	20/01/2013	50/01/3012 b	pointed as Secretary (BPS-9) on 25 nz 2010
9 2 e	eshan Ahrnad	Zahir Shatr	10/03/1993	25/04/2020	1-2/24/ 2020 AD	DOINTED AS DECEPTAN/RPS-01 on 15 of 2020
O AL	odul Majid	Moeen Ud Din	24/03/1995	18/03/-20/20	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	pointed as Secretary (BPS-9) or 18.05.2020 pointed as Secretary (BPS-9) on 18.05.2020

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sample;

Local Govt and RDD Mardan

<u>5.No</u>	Name	Father Name	Day of D	f Junior Secretari		
171		4 4 4 4	Date of Birth	Appointment Date	Current Past	
172	Adnan Khan	fazli Rehman	29/03/1993	12/12/2017	05/06/2020	Promoted to Secretary (BPS-9) on 05,06.2020 Appointed as Nath Cristol (BPS-9) on 12,12,2017
	Shehryar Khan	Nihar Muhammad	18/04/1992	19/12/2017	í	Promoted to Secretary (BPS 9) on 05:06:2020 Appointed as Nati Gasto (BPS 3) on 1912:2017
	<u>Effikhar</u>	Shamshad Khan	05/02/1979	21/12/2017	"	Promoted to Secretary (685-3) on 05.06.2020. Appointed as Naib Qasid (885-3) on 21,12,2017
7	Ibad Ullah	Abid Ullah	04/04/1997	21/12/2017		Promoted to Secotary (BPS 9) on QS062026 (Appointed as Nath Qasid (BPS 3) on 21,12,2017
- 1	Muhammad Tufali	Ghant Rahman	07/05/1998	22/12/2017		Promoted to Secretary (8659) on 05.06.2020 Appointed as Naib Qasid (8659) on 22.12.2017
76 77	Waseem Uflah	Fazal Wahab	06/10/1992	26/12/2017		Promoted to Secretary (BES-9) on 05.06.2020. Appointed as Naib Casid (BPS-9) on 28.12.2017
// n	Muhammad Ilyas	Muhammad Iqbal	01/04/1996	26/12/2017	- 1	Promoted to Secretary (BPS 9) on Q2062020 Appointed as Naib Qasid (BPS-3) on 26.12.2107
/8 N	Aushtaq Ahmad	Muhammad Aziz	01/04/1994	01/01/2018	- 49	Promoted to Secretary (BPS-3) on 05 05 2020 Appointed as Naib Casid (BPS-3) on 0501 2018
K	amran Khan	Hazrat Hassen	02/02/1977	28/02/2018	41	Promoted to Secretary (BPS-9) on 05:18:2020 Appointed as Naib Qasid (BPS-3) on 26:02 2018
T	ajjad Ali	Muhammad Gul	01/01/1983	28/02/2018	16	romoted to Secretary (BPS-9) on Q5,062030 Appointed as Naib Qasid (BPS-3) on 28,02,2018
	noalb Khan	Shah Pasand Khan	07/03/1986	28/02/2018	Į¢.	Promoted to Secretary (BPS-9) on 05,66,2020 ppointed as Naib Qasid (BPS-3) on 28,07,2018
	lansoor Khan raz Ur Rehrman	AmirZada	11/11/1993	28/02/2018	ĮP	romoted to Secretary (BPS-9) on OS 062020 oppointed as Naib Gasld (BPS-3) on 28.02.2018
	r Hamza Sohail	Fayaz Ur Rehman Muhammad Sohaji	28/02/1999 24/03/2002		02/06/2020[P	romoted to Secretary (BPS-9) on 05.06.2020 ppointed as Secretary (BPS-9) on 05.06.2020

September 19

Assistant Director Local Govt & RDD Mardan STESTED TO



Office of The -20 Assistant Director Local Government & Rural Development Department Mardan

Dated MRD/Establ: 8/10/2021

OFFICE ORDER:

No./AD/LG&RDD/MRD/ESTAB/Promotion/2021: Consequent upon the recommendation of Departmental Selection/recruitment Committee meeting held on 50-09-2021, the following Junior Secretaries Village/Neighborhood Council (BPS-09) are hereby promoted to the post of senior Secretary Village/Neighborhood Council (BPS-11), in District Mardan With Immediate effect, in the best public interest:

S.No	Name	Father Name	Date of Birth	Appointment Date	Remarks	
1	Jamal Ahmad	Riaz Ahmad	13/04/1990	24/12/2011	Promoted from BPS-09 to BPS-11	1
2	Muhammad Farooq Shah	Muhammad Zahir Shah	20/11/1976	23/02/2016	Promoted from BPS-09 to BPS-11]
3	Ashfaq	Nadar Khan	10/06/1981	23/02/2016	Promoted from BPS-09 to BPS-1	1
4	Feroz Shah	Syed Zahir Shah	02/04/1985	23/02/2016	Promoted from BPS-09 to BPS-11	1
5	Niaz Muhammad	Muhim Muhammad	09/11/1985	23/02/2016	Promoted from BPS-09 to BPS-11	7
6	Ilisan Ullah	Nadar Khan	15/01/1986	23/02/2016	Promoted from BPS-09 to BPS-11	T
7	Kumail Hamza	Adam Khan	17/02/1986	23/02/2016	Promoted from BPS-09 to BPS-11.	1
8	Abid Ali	Gul Zada	20/03/1986	23/02/2016	Promoted from BPS-09 to BPS-1.1	
9	Habib Ullah	Niez Nabi	15/04/1986	23/02/2016	Promoted from BPS-09 to BPS-11	}
10	Syed Waqas Ali Shal	Syed Ghafar Sha	h 30/04/1986	23/02/2016	Promoted from BPS-09 to BPS-11	1
-	l Faiz Ul Islam	Faiz Ur Rohman	19/09/1986	23/02/2016	Promoted from BPS-09 to BPS-11	1
	2 Janas Khan	Khan Sher	01/01/1987	23/02/2016	Promoted from BPS-09 to BPS-1	7
ī	3 Ismail	Ahınad	02/02/198	23/02/2016	Promoted from BPS-09 to BPS-1	
1	4 Muhammad Younas	Said Zahir Shah	06/02/198	7 23/02/2016	Promoted from BPS-09 to BPS-1	
-	5 Asad Ali	Ali Rahman	11/02/198	7 23/02/2016	Promoted from BPS-09 to BPS-	11
-	6 Taimur Khan	Abdul Sattor	01/03/198	23/02/2016	Promoted from BPS-09 to BPS-	11
-	17 Yasir Khan	Sher Zamin	02/03/198	23/02/2016	Promoted from BPS-09 to BPS-	11
-	18 Sajjed Khan	Abdur Ralıman	20/04/198	37 23/02/2016	Promoted from BPS-09 to BPS-	11
ļ	19 Khalid Khan	Nowsher Khan	12/07/19	87 23/02/2016		
	20 Umar Hayat	Nadir Khan	31/10/19	87 23/02/2016	_	
-	21 Shati Ullah	Atto Ulinh	20/12/19	87 23/02/2016		
}	22 Amir Zeb	Alam Zeb	25/12/19	87 23/02/2016	Promoted from IIPS-09 to IIPS	-11



		·····	·	
l Khari	Umar Khan	02/01/1988	23/02/2016	Promoted from BPS-09 to BPS-11
Fahad	Gul Rehman	01/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
mmad Shafiq	Mir Zaman	10/03/1988	23/02/2016:	Promoted from BPS-09 to BPS-11
Ali Shah	Qadeem Shah	18/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
or Muhammad	Fazal Muhammad	31/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
Ur Rehman	Raj Muhammad	01/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
in Muhammad	Zohir Shah	06/04/1988	23/02/2016	Promoted from BPS-09 to BPS-1
Ali Jan	, Allah Bakhsh	12/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
hah	Magsood Gul	05/01/1989	23/02/2016	Promoted from BPS-09 to BPS-11
hal	1	Mngsood Gul	Magsood Gul 05/01/1989	Mnqsood Gul 05/01/1989 23/02/2016

2) The Officials on promotion will remain on probation for the period one year, in light of (Appointment, promotion & transfer) Rules 1989, with Rules-15(1) of Khyber Pakhtunkhwa Civil Servants.

Assistant Director

Local Govt: & Rural Dev: Department

Mardan

Endst: No & Date Even.

Copy of the above is forwarded to:-

- 1. Director General, LG&RDD Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Commissioner, Mardan.
- 3. District Account Officer, Mardan.
- 4. The Tehsil Municipal Officer (TMA, Mardan)
- 5. PS to Secretary LG&RDD Khyber Pakhtunkhwa.
- Accountant LG&RDD, Mardan.
- 7. Progress officer LG&RDD, Mardan.
- 8. Supervisors LG&RDD Mardan.
- 9. Officials concerned.

Assistant Director

Local Govt: & Rural Dev: Department

Mardan

ATTESTED

- -	Local Govt and RDD Mardan										
_	Seniority List of Junior Secretaries (BPS-09)										
			Date of Birth	Appointment Date	Qualification	Remarks					
	Name	1 8 (1) (1)	1/10/1989	2/23/2016	-	Appointed as Secretary (BPS-7) on 23.02.2016					
1	Imliaz All	Aziz Ullah	1/13/1989	2/23/2016	BA '	Appointed as Secretary (BPS-7) on 23.02.2016					
2	Quality in the second	Momin Khan	1/24/1989	2/23/2016	MA-Islamiat	Appointed as Secretary (BPS-7) on 23.02.2016					
3	Muhammad Salman	Hussain Khan	2/13/1989	2/23/2016		Appointed as Secretary [BPS-7] on 23.02.2016					
4	Liaqat Ali	Deedan Gui	3/3/1989	2/23/2016	B.Tech	Appointed as Secretary (BPS-7) on 23.02.2016					
. 5	Muhammed Sajjad	Amir Wahab	3/5/1989			Appointed as Secretary (BP\$-7) on 23.02.2016					
/6	Tahir Rahman	Ghafoor Rahman	3/25/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23,02,2016					
7	Numan Khan	Fazal Mir	3/23/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016					
8	Muhammed Arif	Muhammad Ghawas	4/6/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016					
9	Aman Khan	Waheed Ullah	reach restriction of		144004	Appointed as Secretary (BPS-7) on 23-07,2018					
1 3 4		Sher Wali Khari	4/10/1989	2/23/2016	B.Sc	Leave without Pay since 03.11.2021.16 Months					
10	THE THE STATE OF T	经分类。安特的特殊数点,从这一点一点。	4/12/1989	2/23/2016	1	Appointed as Secretary (BPS-7) on 23.02.2016					
11	Imran Khan	Alam Zeb	4/12/1989			Appointed as Secretary (BPS-7) on 23,02,2016					
12	Ubaid Ur Rahman	Saif Ur Rahman				Appointed as Secretary (BPS-7) on 23.02.2016					
13	Asif Khushal	Khushal Khan	4/22/1989 4/25/1989		M.Com	Appointed as Secretary (BPS-7) on 23.02.2016					
14	Waseem Shah	Nadar Shah				Appointed as Secretary (BPS-7) on 23,02,2016					
15	Muhammad Imran	Said Ahmad Jan	12/12/1989			Appointed as Secretary (BPS-7) on 23.02,2016					
16		Muhammad Tahir	1/6/1990			Appointed as Secretary (BPS-7) on 23.02.2016					
17		Syed Zaman	2/5/1990			Appointed as Secretary (BPS-7) on 23.02.2016					
18		Akbar Hussain	2/11/1990			Appointed as Secretary (BPS-7) on 23.02.2016					
19		Zahir Taj	3/1/1990			Appointed as Secretary (BPS-7) on 23.02.2016					
20		Farman	3/5/1990			Appointed as Secretary (BPS-7) on 23.02.2016					
21		Burhan Ud Din	3/15/1990			Appointed as Secretary (BPS-7) on 23,02,2016					
22		Niaz Ali	3/20/1990		6 M Phil	Appointed as Secretary (BPS-7) on 23.02.2016					
2		Afzal Khan	4/1/199			Appointed as Secretary (BPS-7) on 23.02.2016					
24		Liaqat Ali	4/3/199			Appointed as Secretary (BPS-7) on 23,02,2016					
25		Gul Rosh	4/12/199			Appointed as Secretary (8PS-7) on 23.02.2016					
26		Syed Wali Shah	6/22/199		G MBA	Appointed as Secretary (BPS-7) on 23.02.2016					
2		Fazii Qadar	8/28/199		o IVIDA	Appointed as Secretary (BPS-7) on 23.02.2016					
21		Syed Bashir Hussaln	9/25/199		וב ווככר	Appointed as Secretary (BPS-7) on 23.02.2016					
2		Nisar Muhammad	12/15/199		ICIA Se	Appointed as Secretary (BPS-7) on 23.02.2016					
3		Gul Rehman	1/7/199			Appointed as Secretary (BPS-7) on 23.02.2016					
		Mehrahan Shah	1/21/199			Appointed as Secretary (BPS-7) on 23.07.2016					
3		Kifayat Ullah	2/1/199		10 237	Appointed as Secretary (8PS-7) on 23.02.2016					
1 3		Gul Zada	2/9/199	2/23/20:	TO INIA						
3	3 IVSUIG FIUSSOIII			-		The second secon					

Service Services

	Local Govt and RDD Mardan								
	·	•							
		Senio	ority List of I	lunior Secretaries	(BPS-09)				
S.No	Name	Father Name	Date of Birth		Qualification	Remarks			
34	Muhammad Arif	Mir Alam	2/12/1991			Appointed as Secretary (BPS-7) on 23.02.2016			
35	Abrar Ahmad	Pazir Gui	· 2/12/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
36	Salman Akhlar	Amir Ud Din	3/16/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
37	Zakir Khan	Taza Gul	3/17/1991	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016			
38	Arshad Ali	Jan Syed	3/17/1991	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016			
39	Inayet Ur Rehman	Bakht Zada	3/30/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
40	Muhammad Asif	Ghulam Hussaln .	3/31/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
41	Atta Ur Rahman	Meher Gul	4/3/1991		MA-Islamiat	Appointed as Secretary (BPS-7) on 23:02.2016			
42	Muhammad Arif	Fakhruz Zaman	4/4/1991	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23,02,2016			
43	Hamair Ali	Gul Sher	4/4/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
44	Muhammad Ibrahim	Tilawat Khan	4/5/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
45 -	Muhammad Saqib Khan	Raheem Khan	4/15/1591	2/23/2016		Appointed as Secretary (BPS-7) on 23:02:2016			
46	Mohsin Khan	Hassan Khan	8/1/1991			Appointed as Secretary (BPS-7) on 23.02.2016			
47	Syed Amild Ali Shah	Syed Jamail Shah	8/15/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23,02.2016			
48	Yaseen Ahmad	Noor Muhammad	12/12/1991			Appointed as Secretary (BPS-7) on 23.02.2016			
49	Shahid Hussain	Shahbaz Khan	1/1/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
50	Muhammad Junald	Muhammad Yaseen	1/3/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
51	Muhammad Abbas	Zahid Gui	1/10/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
52	Muhammad Yaqub	Muhammad Ibrahim	1/12/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
53	Bilal Khan	Akmal Khan	1/17/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
54	Asif Ali Shah	Sehat Shah	2/16/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
55	Waqas Khan	Sheryar	3/7/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
56	Imad Naeem	Fazli Naeem	3/10/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
57	Adil Khan	Bashir Ahmad Khan	3/15/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
58	Fawad All	Imtiaz Khan	3/17/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
59	Mubassar Shah	Fazle Malik	3/18/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
60	Muhammad Zeb	Rahlm Gul	3/23/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
61	Muhammad Adil	Abdul Qadir	3/25/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
62	Muhammad Zaib	Faiz Muhammad Set 100	. 4/8/2992			Appointed as Secretary (BPS-7) on 23.02.2016			
63	lmran Khan	Hussain Muhammad	4/10/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
64	Hazrat Umar	Khan Bahadar	4/11/1997			Appointed as Secretary (BPS-7) on 23.02.2016			
-65	Anwar Ali	Sabz Ali	4/15/1997			Appointed as Secretary (BPS-7) on 23.02.2016			
66	Waqas Khan	Riaz Khan	4/21/1992			Appointed as Secretary (BPS-7) on 23.02.2016			
	Syed Feroz Shah	Syed Jamail Shah	4/25/1992	, 2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016			

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		Senio	rity List of J	unior Secretarles	(BPS-09)	* "Mugan"
- -	Name			Appointment Oate	Qualification	Remarks
	Marria	Mumtaz Khan	5/30/1992	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	retain, Of the	Kifayat Ullah	8/5/1992		MA-Islamlat	Appointed as Secretary (BPS-7) on 23.02.2016
		Alam Zeb Khan	1/15/1993	2/23/2016	вА	Appointed as Secretary (BPS-7) on 23.02.2016
	phonon .	Wazir Gul	3/3/1993	2/23/2016	8.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
	mescuii tutori	Pir Muhammad	3/13/1993	2/23/2016		Appointed as Socretary (BPS-7) on 23.02.2016
	Contract dum.	Umar Sher	3/15/1993	2/23/2016	B.Sc.	Appointed as Secretary (BPS-7) on 23.02.2016
<u> </u>		Muhammad Shah	3/20/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
.74		Darwish Khan	4/6/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
1	1000	Muhammad Yar	5/4/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	10-11-11-1	Hawat Umar	5/4/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
77	Muhammad Islam	Anwar Zeb	5/5/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.07.2016
		Bakht Tai	9/5/1993	2/23/2016	SSC .	Appointed as Secretary (BPS-7) on 23:02:2016
79	Mubassir Khan Shahan Khan Nagi	Muhammad Nagi	4/8/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
80		Lal Mir	4/20/1994	2/23/2016	8.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
81	Muhammad Zeeshan	MAN KINNER KAN KANSI MAK				Appointed at Secretary (BPS-7) on 23 02 2016 (1995)
100		Sved Ahmad Hussain Shah	4/30/1994	2,3 70,2 2/23/2016		They without Paysing 12:11:2019 (1997)
13.84	14.10日中国的14.10日本资格第一个基本			7.30		Lave without they estended on 24.06.2020 2 Years
	da i waxa daya jasine,	Namoos Khan	5/1/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23:02:2016
83	Muhammad Sahib	Jafar Khan	5/2/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
84	Naseer Khan	Khalid Khan	5/10/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
85	Irfan Ullah	Sher Zada	8/4/1994		DAE-Electrical	Appointed as Secretary (BPS-7) on 23.02.2016
86	Sami Ullah	Saleh Badshah	8/15/1994	2/23/2016	HSSC	Appointed as Secretary (BPS-7) on 23.02.2016
87	Farooq Badshah	Muhammad Irshad	10/20/1994		MA	Appointed as Secretary (BPS-7) on 23,02,2016
88		Sabir Ali	2/2/1995		MA	Appointed as Secretary (BPS-7) on 23:02,2016
89	Hassan Nasir	Abdul Samad	2/2/1995		DAE	Appointed as Secretary (BPS-7) on 23.02.2016
90		Niaz Muhammad	3/16/1999	2/23/2018		Appointed as Secretary (BPS-7) on 23.02.2015
91	Fawad Ahmad	Noor Badshah	4/1/1995	2/23/2016	DAE-CIVII	Appointed as Secretary (BPS-7) on 23.02.2016
. 92		Muhammad All	4/29/1995		HSSC	Appointed as Secretary (BPS-7) on 23.02.2016
		Sved Hussain	1/15/1996		5 D.Com	Appointed as Secretary (BPS-7) on 23.02,2016
.94	1 4	Sheikh Muhammad Yousaf	2/20/1998			Appointed as Secretary (BPS-7) on 23.02.2018
95		Ali Haider	2/10/1987		6 MA	Appointed as Secretary (BPS-7) on 02.05.2016
96		Muhammad Umar Khan	2/13/1990	5/20/201	6 M.Com	Appointed as Secretary (BPS-7) on 20.05.2016
97		Mukhtlar Hussain	2/4/199	100000000000000000000000000000000000000	6 MBA Finance	Appointed as Secretary (BPS-7) on 20:05:2016
98			3/2/199		6 MA-Urdu	Appointed as Secretary (BPS-7) on 20.05.2016
<u>. 99</u>	Khaista Rahman	Multan	<u> </u>	: '.		

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		Seni		lunior Secretaries	(BPS-09)	
S.No	Name	Father Name	Date of Birth		Qualification	Remarks
100	Muhammad Alí	Taj Wali Shah	3/31/1991			Appointed as Secretary (BPS-7) on 20.05.2016
101	Shawkat Ali	Shah Pasand Khan	4/13/1991		MA	Appointed as Secretary (BPS-7) on 20.05.2016
102	Fida Muhammad Khan	Sajjad Ali	1/22/1992			Appointed as Secretary (BPS-7) on 20.05.2016
. 103	Shah Faisal	Akmai Khan	2/1/1992			Appointed as Secretary (BPS-7) on 20.05.2016
104	Jamil Khan	Muhammad Khan	2/10/1994		MA Islamiat	Appointed as Secretary (BPS-7) on 20,05,2016
105	Liagat Shair	Sarfaraz Khan	11/6/1994			Appointed as Secretary (BPS-7) on 20.05,2016
106	Noman Jamal	Jamal Abdul Nasir	8/1/1995		DAE-Electrical	Appointed as Secretary (BPS-7) on 20.05.2016
107	Zia Ul Haq Adil	Amin UI Haq	3/30/1991		DAE-Electrical	Appointed as Secretary (BPS-7) on 23.05.2016
108	Taqweem Ui Haq	Anwar Ul Haq	5/23/1993			Appointed as Secretary (BPS-7) on 15.09.2017
109	Asad Ali	Feroz Shah	1/17/1990			Appointed as Secretary (BPS-7) on 25.09.2017
110	Jehangir Shah	Maroof Shah	1/5/1989			Appointed as Secretary (BPS-9) on 23.02.2018
111	Talmoor Ali Shah	Inayat Ali Shah	5/2/1998	11/30/2018	DAE	Appointed as Secretary (BPS-9) on 30.11.2018
		المستعدد وأسا	3/15/1971	6/2/1990	ra ·	Promoted to Secretary (BPS-9) on 30.04.2019
112	Mohib Ullah	Hamish Gul	3/13/13/1	4/2/1550		Appointed as Naib Qasid (BPS-1) on 02.06,1990
		Faqir Hussain	4/3/1974	7/25/1993	SSC	Promoted to Secretary (8PS-9) on 30.04.2019
TTŹ	Arshad Hussain					Appointed as Naib Qasid (BPS-1) on 25.07.1993
	Dii Raj Khan	Shamshad Khan	4/12/1973	3/16/1994	B.A	Promoted to Secretary (BPS-9) on 30.04.2019
114						Adjusted as Nalb Qasid (BPS-1) on 12.12.2001
					<u> </u>	Appointed as Chowkidar (Temp) on 16.03.1994
			2/27/1969	5/18/1994	ccr	Promoted to Secretary (BPS-9) on 30,04,2019
115	Zakir Muhammad	Jamshid Muhammad	2/27/1503	3/10/1994]3.	Appointed as Chowlidar (BPS-1) on 18.05.1994
_						Promoted to Secretary (8PS-9) on 30.04.2019
116	Muhammad Salim	Muhammad Rahim	7/12/1971	1/1/1995	Nil	Adjusted as Naib Casid (BPS-1) on 14,05,2003
				1		Appointed as Lab Attendent (Temp) on 01.01.1995
		Muhammad Aslam		10/20/2005	SSC	Promoted to Secretary (BPS-9) on 30.04.2019
117	Muhammad Zaman		2/4/1983	10/20/2005		Appointed as Naib Qasid (BPS-1) on 20.10.2005
			1/20/4022	4/22/2013		Promoted to Secretary (BPS-9) on 30.04.2019
118	Bashir Muhammad	Dilawar Khan	4/20/1977	4/22/2013		Appointed as Naib Qasid (BPS-1) on 27.04.2013
	The state of the s		7/54/4007	4/22/2013		Promoted to Secretary (BPS-9) on 30.04.2019
119	Umar Farooq	Saif Ur Rehman	2/11/1992	4/22/2013	-	Appointed as Naib Qasid (BPS-1) on 22.04.2013
				4/3/20-5	1.	Promoted to Secretary (BPS-9) on 30.04.2019
120.	Muhammad Mustafa	Miraj Muhammad	10/2/1977	4/3/2015	:	Appointed as Naib Casid (BPS-3) on 03.04.2015
			5 / a a / 5 / 5 / 5	# (1) (204 C		Fromoted to Secretary (SPS-9) on 30.04.2019
121	Sami Uliah	Aman Ullah Khan	5/11/1979	4/3/2015		Appointed as Naib Qasid (BPS-3) on 03.04,2015

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			Local Gov	t and RDD Marda	317	
		Seni	ority List of .	lunior Secretaries	(BPS-09)	
5.No	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks
122	Farhad All	Raham Sala Khan	2/3/1985	7/5/2019	MA.T	Appointed as Secretary (8PS-9) on 05.07.2019
123	Ihtishám	Noor Ul Haq	8/20/1987	7/5/2019	BA '	Appointed as Secretary (BPS-9) on 05,07.2019
124	Jan Muhammad	Shanis Ul Qamar	1/15/1989	7/5/2019	M8A	Appointed as Secretary (8PS-9) on 05.07.2019
125	Muhammad Imran	Muhammad Parvez	3/3/1990	7/5/2019	B.Sc	Appointed as Secretary (BPS-9) on 05.07.2019
126	Sajad	Aman Ullah Khan	3/5/1992	7/5/2019	B.Sc	Appointed as Secretary (BPS-9) on 05:07:2019
127	Sibghat Ullah	Jalal Ud Din	3/9/1992	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
128	Abdul Naeem Khan	Abdul Qayum Khan	4/3/1993	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
129	Numan	Ghulam Rasool	4/25/1993	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
130	Kashan Ali	Ehsan All	9/1/1993	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
131	Wisal Muhammad	Gul Nabi	3/5/1994	7/5/2019	M.Com	Appointed as Secretary (BPS-9) on 05.07.2019
132	Farhad Ali	Murad All	2/6/1995	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
133	Umair Khan	Siraj Ur Rehman	4/7/1995	7/5/2019		Appointed as Secretary (8PS-9) on 05.07.2019
134	Muhammad Talmeer Khan	Gul Bahadar	6/17/1999	<u> </u>	BS-Software	Appointed as Secretary (BPS-9) on 05:07.2019
135	Muhammad Abbas Khan	Zulfigar Ali	2/2/2000	7/22/2019		Appointed as Secretary (8PS-9) on 22,07,2019
136	Sadam Hussain	Rahim Gul	4/25/1996	7/26/2019		Appointed as Secretary (BPS-9) on 26,07,2019
137	Zahoor Khan	Hukam Khan	3/2/1995	4/15/2020		Appointed as Sécretary (BPS-9) on 15.04.2020
138	Zeeshah Ahmad	Zahir Shah	9/10/1994	5/18/2020		Appointed as Secretary (BPS-9) on 18.05.2020
139	Abdul Majid	Moeen Ud Din	3/24/1995	5/18/2020	MS	Appointed as Secretary (BPS-9) on 18.05.2020
1.00		Fazli Rehman	3/29/1993	12/12/2017		Promoted to Secretary (BPS-9) on 05,06.2020
140	Adnan Khan	Fazii Renman	3/23/1333	12,12,2017		Appointed as Naib Qasid (BPS-3) on 12.12.2017
1.44	State and the	NATE OF THE PROPERTY OF THE PR	4/18/1992	12/19/2017	i ha	Promoted to Secretary (BPS-9) on 05.06.2020
141	Shehryar Khan	Nihar Muhammad	4/10/1932	12/13/2011	<u> </u>	Appointed as Naib Qasid (BPS-3) on 19.12.2017
1			2/5/1979	12/21/2017	EA	Promoted to Secretary (BPS-9) on 05,06,2020
142	Iftikhar	Shamshad Khan	43/13/3	12/21/2017		Appointed as Naib Qasid (BPS-3) on 21.12.2017
			4/4/4007	12/21/2017	F.Sc	Promoted to Secretary (BPS-9) on 05.06.2020
143	Ibad Ullah	Abid Ullah	4/4/1997	12/21/2017		Appointed as Naib Qasid (BPS-3) on 21.12.2017
			t /7/1000	12/22/2017	DAE	Promoted to Secretary (BPS-9) on 05.06.2020
144	Muhammad Tufail	Ghani Rahman	5/7/1998	12/22/2017	DAE	Appointed as Naib Qasid (BPS-3) on 22.12.2017
			2/20/2000	12/22/2017	w/matrix	Promoted to Secretary (BPS-9) on 05:06.2020
145	Ayaz Ur Reḥman	Fayaz Ur Rehman	2/28/1999	12/22/2017		Appointed as Naib Qasid (BPS-3) on 22.12.2017
		Ullah Fazal Wahab	10/6/1992	12/26/2017	cca	Promoted to Secretary (BPS-9) on 05.06.2020
146	Waseem Ullah				1004	Appointed as Nally Qasid (BPS-3) on 26.12.2017
					F c	Promoted to Secretary (8PS-9) on 05.06.2020
147	Muhammad liyas	Muhammad Iqbəl	4/1/1996	12/26/2017	r.ac	Appointed as Naib Qasid (8P5-3) on 26.12.2107

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			Seniority List of .	lunior Secretaries	(BPS-09)	
S.No	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks
148	Mushtar Ahmad	Muhammad Aziz	4/1/1994	1/1/2018	SSC	Promoted to Secretary (BPS-9) on 05.06.2020. Appointed as Naib Qasid (BPS-3) on 01.01.2018
149	Kamran Khan	Hazrat Hassan	2/2/1977	2/28/2018	ssc	Promoted to Secretary (BPS-9) on 05.06,2020 Appointed as Naib Qasid (BPS-3) on 28.02.7018
150	Sajjad Ali	Muhammad Gul	1/1/1983	2/28/2018	F.Sc	Promoted to Secretary (BPS-9) on 05,06,2020 Appointed as Naib Qasid (BPS-3) on 28,02,2018
151	Shoaib Khan	Shah Pasand Khan	3/7/1986	2/28/2018	s sc	Promoted to Secretary (BPS-9) on 05,06,2020 Appointed as Naib Qasid (BPS-3) on 28,02,1018
152	Mansoor Khan	Amir Zada	11/11/1993	2/28/2018		Promoted to Secretary (BPS-9) on 05,06,2020 Appointed as Nalb Qasid (BPS-3) on 28,02,2018
153	Pir Hamza Schail	Muhammad Sohali	3/24/2002	6/5/2020	HSSC	Appointed as Secretary (BPS-9) on 05.06.2020
154	Muhammad Shoaib	Muzaffar Shah	3/18/1992	3/9/2021	ВА	Appointed as Secretary (BPS-9) on 09.03.2021
155	Sunny Mushtaq	Mushtaq Masin	7/24/1992	9/13/2021	D.Cam	Appointed as Secretary (BPS-9) on 13.09.2020
156	Sundaish Raj	Tilak Raj	5/17/1998	9/13/2021	BS-Psycholgy	Appointed as Secretary (BPS-9) on 13.09.2020
157	Ayub Masih	Younas Masih	3/15/2002	9/13/2021	F.Sc-Medical	Appointed as Secretary (BPS-9) on 13.09.2020
158	Salman Ali Khan	Mumtaz Ali Khan	3/27/1990	10/12/2021		Appointed as Secretary (BPS-9) on 12.10.2021

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Assistant Director
Local Govt & RDD Mardan

ATTES

DIRECTORATE GENERAL LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT KHYBER PAKHTUNKHWA

No. Director (LG) 3-1/Establishment/2022-23/8165 Dated Peshawar the, 7 February, 2023

To

The Secretary to Government of Khyber pakhtunkhwa,

Local Government, Election & Rural Development Department.

Attention:

The Section Officer (Estab-II).

Subject:

GUIDANCE CLARIFICATION REGARDING SENIORITY LIST OF JUNIOR VILLAGE /

NEIGHBORHOOD COUNCIL SECRETARIES (BPS-09)

Respected Sir,

I am directed to refer to the subject cited above and to state that the offices of the assistant directors LG&RDD Khyber Pakhtunkhwa have previously formulated the seniority lists of the junior village/neighborhood council secretaries on the basis of date of birth under rule-17(4) of the Appointment, Promotion and Transfer Rules 1949 without considering the merit / aggregate marks of the appointed candidates and many officials have been promoted in the post of Senior Village/Neighborhood Council Secretaries (BPS-11) on the basis of seniority formulated on date of birth. However, Junior Village Secretaries appointed in 2016 on the basis of the test conducted by ETEA or other testing agencies have been repeatedly making appeals to this office to formulate seniority of the Junior Village Secretaries (BPS-09) on the basis of merit/aggregate marks.

The service rules for the post of Junior Village Secretary (BPS-09) notified vide Local Government Elections and Rural Development Department Notification No SO(E)LG/2-184/SSRC/2018 dated 05.04.2018 (Annex-I and Notification No. SO(E)LG/2-188/SSRC/2019 dated 16/10/2019 (Annex-II) provides that.

"Eighty (80) percent by initial recruitment:

Provided that the candidate shall be preferably a bonafide resident of the same Village/ Neighborhood Council. If such candidate is not available in the same Village Council/Neighborhood Council then the candidate from adjacent Village Council/Neighborhood Council;

Provided further that in case of non-availability of candidate from adjacent Village Council/ Neighborhood Council then from any other Village Council/Neighborhood Council in that Tehsil

Foregoing in view, the Directorate General LG&RDD vide Circular No. Director (LG)3-1/Establishment/2022/2343-49 dated 24/10/2022 (Annes-III) directed all the field formations to formulate seniority lists on the basis of merit/aggregate under Rule-17(1)(a) of the Appointment, Promotions and Transfer Rules, 1989 instead of date of birth. However, many Junior Vi lage Secretaries (BPS-09) have approached this office requesting to cancel the promotions made on the basis of seniority lists formulated on date of birth.

In light of the above, the case is forwarded to your good office with request to approach Establishment Department Government of Khyber Pakhtunkhwa for clarification and guldance as to keep intact the promotions which have been made on the basts of seniority lists formulated on date of birth or otherwise, please.

Sincerely Yours,

(VIKASH)

Assistant Director (Admin/HR)

LGARDD

Endst: No & date even: Copy forwarded to the

1. All Assistant Directors, LGARDD, Khyber Pakhtunkhwa

2. PA to Director General, LG&RDD, Khyber Pakhtunkhwa

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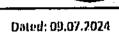


OFFICE OF THE ASSISTANT DIRECTOR (SENIOR)

LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT



No. LG-MRD/Establishment/ ゴム



OFFICE ORDER:

AD/LG&RDD(MRD)/Sentority-list/2023-24 The Competent authority has been pleased to issue updated Tentative Seniority List of Junior Village Secretaries(BPS-09) of VC/NC's District Mardan on the basis of Merit assigned by the departmental selection committee(DSC) in light of the Directorate General LG&IIDD KPK circular No.Director(LG)3-1/Establishment/2022/2343-49 dated Peshawar, the 24th October,2022 & Office Order No.Director(LG)3-1/Establishment/2022/4888-94 dated Peshawar, the 15th November,2022 (Attached).

Encl: Tentative Seniority List

LG&RDD Mardan

Endst. Even No. and Dated

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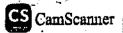
- 1. Director General LG&RDD, KPK.
- 2. Director (Admin) LG&RDD, KPK.
- 3. Deputy Commissioner, Mardan.
- 4. Assistant Director (Admin) LG&RDD, KPK.
- 5. Progress Officer, Tehsil Mardan, Takht-Bhal, Rustam, Katlang & Garhi-Kapoora District Mardan.
- Progress Officer, Tehsil Mardan, Takht-Bhal, Rustam, Katlang & Garhi-Kapoora District Mardan. All Secretaries VC/NC's District Mardan.
- B. Office File.

Ector (Senior) LG&RDD Maldan

0937 9230067

adigmardan1@gmail.com





TENTATIVE SENIORITY LIST OF SECRETARIES VC/NC ON THE BASIS OF MERIT LIST/AGGREGATE+INTERVIEW MARKS) DISTRICT

S.No	Name	Father Name	Date of Birth	Appointment Date	Current Post	Remarks	Morks	Remarks
1	Muhammad Arif	Fakhruz Zaman	04/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	85.5	Nil
2	Liaqat Ali	Deedan Gul	13/02/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	85	Nil
3	Ihsan Uddin	Burhan Ud Dio	15/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	85	Nil
4	Waseem Shah	Nedar Shah	25/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02,2016	84.5	Nil
5	Jafar Khan	Gut Rehman	07/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	84.5	Nil
6	Tahir Hussain	Akbar Hussain	11/02/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02,2016	84	Nil
7	Imran Khan	Alam Zeb	12/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83.5	Nil
8	Muhammad Asghar	Gul Rosh	12/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83.5	Nil
9	Khan Shahan Khan Nagi	Muhammad Naqi	08/04/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83.5	Nil
10	Hamad Ali	Niaz Ali	20/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83	Nil
11	Sajjad Afzal	Afzal Khan	01/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	83	Nil
12	Muhammad Abbas	Zahid Gul	10/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	83	lin
13	Asif Ali Shah	Sehat Shah	16/02/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83	Nil

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14	Waqas Khan	Riaz Khan	21/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	85	Nil
15	Naik Wali	Sher Wali Khan	10:04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	<u>87.5</u>	Nil
6	Numan Khan	Fazal Mir	25:03/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	822	Nil
7	Yaseen Ahmad	Noor Muhammad	12/12/1991	23/02/2016	23/02/3016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil .
2	Hazrat Umay	Khan Bahadar	11/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil
9	Anwar Ali	Sabz Ali	15/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil
20	inayat Ur Rahman	Bakht Zada	30/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81.5	Nil
21	Waqas Khan	Sheryar	07/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81.5	Nil
2.7	Muhammad Zeb	Rahim Gul	23/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81.5	Nil
23	Muhammad Sajjad	Amir Wahab	03/03/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81	Nil
24	Hamait Ali	Gul Sher	04/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81	Nil
25	imran Khan	Hussain Muhammad	10/04/1992	23/02/2016 ·	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80.5	Nil
26	Gul Wahab	Muhammad Yar	04/05/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80.5	Nil .
27	Bilal Khan	Akmal Khan	17/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	20	Nil
28	Muhammad Zeeshan	Lal Mir	20/04/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80	Nil
29	Muhammad Ibrahim	Tilawat Khan	05/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	79.5	Nil
30	Habib Ullah	Kifayat Ullah	05/08/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	79	Nil
31	Musawir Khan	Wazir Gul	03/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-17) on 23,02,2016 (1	79	Nil •

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32	Nasir Khan	Mehraban Shah	21/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	78.5	Nil
<u>.</u>	Tariq Shah	Syed Wali Shah	22/06/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	78	Nil
_	Basit Ali	Muhammad Ali	29/04/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	77.5	Nil
5	Salman Akhtar	Amir Ud Dîn	16/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	77	Nil
6	Abdullah Shah	Muhammad Shah	20/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	77	Nīl
.,	Asif Khushal	Khushai Khan	22/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	·76	Nil
8	Sami Ullah	Sher Zada	04/08/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	76	Nil
19	Atta Ur Rahman	Meher Gul	03/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Nil
0	Adil Khan	Bashir Ahmad Khan	15/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	. 75.5	Nil
41	Ibad Ullah	Darwish Khan	06/04/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Nil
12	Akbar Ali	Abdul Samad	02/02/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Níl
43	Nascer Khan	Jafar Khan	02/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75	Nil
44	Farooq Badshah	Salch Badshah	15/08/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75	Nil
45	Muhammad Saqib	Raheem Khan	15/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5	Nil
46	Khan Muhammad Adil	Abdul Qadir	25/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5	Nil
47	Muliammad Salman	flussain Khan	24/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nil
48	Aman Khan	Waheed Uilah	06/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nil
.49	Muliammad Asad	Farman	05/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nil

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50	Farhad Ali	Liagat Ali	03/04/1990	23/02/2016/	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nii
51	Muhammad Junaid	Muhammad Yascen	03/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nil
52	Noman Sadiq	Noor Badshah	01/04/1995	23/02/2016	23/02/2016	Appointed as Secretary (DPS-7) on 23.02.2016	74	Nil
53	Ali Razo	Nisar Muhammad	15/12/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	73.5	Nil
54	Shahid Hussain	Shahbaz Khan	01/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	73,5	Nil
55	Muhammad Imran	Said Ahmad Jan	12/12/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	73	Nil
56	Mubassar Shah	Fazle Malik	18/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	73	Nil
57	Muhammad Waqas	Sheikh Muhammad Yousaf	20/02/1996	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	73	Nil
58	Tahir Rahman	Ghafoor Rahman	05/03/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
59	Syed Bilawal Hussain	Syed Bashir Hussain	25/09/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72,5	Nil
60	Muhammad Arif	Mir Alam	12/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
61	Muhammad Zaib	Faiz Muhammad	08/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
62	Abdul Hasecb	Hazrat Umar	04/05/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
63	Arshad Ali	Jan Syed	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72	Nil
64	Salman Ullah	Pir Muhammad	13/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72	Nil
65	Ishfaq Ali	Muhammad Irshad	20/10/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72	Nil
66	Abrar Ahmad	Pazir Gul	12/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71.5	Nil
67	Syed Amjid Ali Shah	Syed Jamal Shah	15/08/1991	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016	71.5	Nil



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63	Zahid Hussain	Gul Zada	09/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	.71	Nil
69	Zakir Khan	Taza Gul	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nil
70	Haider Sher	Umar Sher	15/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nil
71	Muhammad Sahib	Namees Khan	01/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nil
72	e grand and and	Muhammad Ibrahim	12/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70.5	Nil
73	Irfan Khan	Fazli Qadar	28/08/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70	Nil
74	Mohsin Khan	Hassan Khan	01/08/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70	นั้น
75	Bilal Khan	Alam Zeb Khan	15/01/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70	Nil
76	Muhammad Islam	Anwar Zeb	05/05/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	68.5	Nil
77	Gul Taj	Zahir Taj	01/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	67	Nil
78	Imtíaz Ali	Aziz Ullah	10/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	66	Nil
79	Junaid Ur Rehman	Kifayat Ullah	01/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	65	Nil
80	Syed Saif Ullah	Syed Ahmad Hussain Shah	30/04/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	65	Nil
81	Syed Feroz Shah	Syed Jamal Shah	25/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	د 64	Nil
82	Sajjad Ali	Syed Hussain	:15/01/1996	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	64.5	Nii
83	Muhammad Asif	Ghulam Hussain	31/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	63.5	Nil
84	Amin Ul Haq	Mumtaz Khan	30/05/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	63,5	Nil
85	Mubassir Khan	Bakht Taj	05/09/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	63.5	H Nil

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Só .	Irfan Ullah	Khalid Khan	10/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (I3PS-7) on 23.02.2016	62	Nii
\$7	Riaz Ali	Muhammad Tahir	06/01/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	61.5	Nil
88	Sajid Khan	Syed Zaman	05/02/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	61.5	Nil
89	Imad Nacem	Fazli Naeem	10/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	61	Nil
90	Muhammad Arif	Muhammad Ghawas	27/03/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	60,5	Nil
91	Sabir Khan	Momin Khan	13/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	60	Nil
92	Fawad Ahmad	Niaz Muhammad	16/03/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02,2016	57	Nil
93	Hassan Nasir	Sabir Ali	02/02/1995	23/ 02/2 016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	54.5	Nil
94	Fawad Ali	lmtiaz Khan	17/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	49	Nil

STESTED.

Assistant Director (Senior)
Local Govt & Rural Development
Mardan.

DEFORE THE OFFICE OF WORTHY ASSISTANT DIRECTOR (SENIOR) LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT, MARDAN

In the Matter:

Office Order bearing No. LG-MRD/Establishment/3832,

Dated: 09/07/2024 (Tentative Seniority List)

Subject:

Objection Petition against the Office Order bearing No. LG-MRD/Establishment/3832, Dated; 09/07/2024 (Tentative Seniority List) of your good self, following order No. Director (LG) 3-1/Establishment/2022/4978-94, Dated: 15th November, 2022 of the Directorate General Local Government & Rural Development Department Khyber Pakhtukhwa,

Respected Sir!

Facts in Brief:

The objectors humbly submit as under;

- That, the objectors are servants and performing their duties honestly, devotedly and faithfully since their initial appointments on 23/02/2016 as junior secretaries' village and neighborhood councils in their respective VC/NCs.
- 2. That, upon initial appointment of the objectors along with other recruited official of the department a seniority list was prepared and updated from time to time after promotions and finally in light of a circular of Haripur having entirely different situations issued the instant impugned list by your good office against the Rule 17(4) proviso of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and the objectors were placed from top to bottom of the merit list.

(Copies of the office order and impugned tentative list are hereby attached as Annexure "A" and "A-I")

3. That, the objectors being aggrieved from above mentioned Office Order No. Office Order bearing No. LG-MRD/Establishment/3832, Dated: 09/07/2024 (Tentative Seniority List) of your good self, following order no. Director (LG) 3-l/Establishment/2022/4978-94, Dated: 15th November, 2022 of the Directorate General Local Government & Rural Development Department Khyber Pakhtukhwa have no other adequate relief but to approach before your good self for their redressal on the strength of following grounds;

GROUNDS:

A. That, All of the secretaries of village and neighborhood councils were initially appointed on 23/02/2016 vide a single order evident from the list of initial appointments followed by final seniority list which was not

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objected by anyone hence, got finality and vide Office Order No. /AD/LG&RDD/MRD/PSTAD/Promotion/2021/237, Dated 08/11/2021 about 30 persons were promoted on the basis of Rule 17 (4) in accordance to seniority by older age and the objectors were left on top of the list. Therefore, impugned list is against the law and rules and liable to be set aside.

(Copies of Office Order Dated: 08/11/2021 and both this are hereby uttached as Annexure "B", "C" & "C-1")

- B. That, impugned order dated: 09/07/2024 is upshot of misconstruing order No. Director (LG) 3-l/Establishment/2022/4978-94, Dated: 15th November, 2022 of the Directorate General Local Government & Rural Development Department Khyber Pakhtukhwa for the reasons that in the said order/notification there was issue of having different dates of their initial appointments however, in case of the abjectors all of the promotes and affected persons have same dated of appointment. Therefore, in the present case Rule 17 1(a) is not applicable rather than rule 17 (4) is applicable hence, impugned order and notifications are liable to be set aside and old list of promotion be maintained as per law and rules.
- C. That, needless to mention here that there are several examples of the promotions on the basis of the rule 17 (4) of this department and other departments like Notification No. Director (LG) 3-1/Establishment/2017/10803, Dated: 28th February, 2018 of the Director General Local Government and Rural Development Department Khyber Pakhtunkhwa, it was clarified that all the promotions shall be made in accordance with Section 17 (4) of the Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion & Transfer) Rules, 1989, so in such eventuality notification of your good self, following notification/office order Dated: 15 November, 2022 are liable to be recalled and old list of seniority be maintained.

(Copy of the notification Dated: 28/02/2018 is hereby attached as Annexure "D")

D. That, needless to mention here that this Department has already followed Section 17(4) of the ibid rules in recent promotion of Office Assistants/Senior Scale Stenographers (BPS-16) in its Notification No. DG(LG)/Seniority List/OA&SS/2023/6296-6302, Dated: 18/10/2023, of Director General Local Government & Rural Development Khyber Pakhtunkhwa, which further clarifies that impugned letter/notification and seniority list were prepared and issued in post haste manners.

(Copy of the notification Dated: 18/10/2023)

(Copy of the notification Dated: 18/10/202 Is hereby attached as Annexure "E")

E. That, similarly there are other notifications and judgments upon promotions in several departments further supports version of the objectors on the score of age wise seniority as envisaged under section 17 (4) of the ibid rules. For reference of your good self, Application No. SO(Primary-M)E&SED/4-7/Seniority of PST under Court Act, 2017/Court Case/2024, Dated: 26/06/2024 in pursuance of Letter No. 3656(AD Lit-II), Dated: 09/01/2024, responded by Law, Parliamentary



Affairs & Human Rights Department vide Letter/Notification No. ALO (OP)/LD/15-2/2023/KC/7405-7408, Dated: 20/05/2024 coupled with Judgment of the Honorable Peshawar High Court, Peshawar in Service Appeals No's. 2070/2019 to 2079/2019, instituted on 23/12/2019, Decided on 31/05/2023. All of the these referred notifications and judgment provides that seniority is determined based on their continuous service within the cadre and if two or more employees have the same date of continuous service the employee older in age is to be considered senior to younger one. Hence, impugned order/notification seems output of blased and post haste manner following mis-reading and non-reading of available record, rules and law. Thus, liable to be recalled/revised.

(Copies of the notifications, services appeals are hereby attached as Annexure "F", "F-1", "F-2" and "F-3")

F. That, it is pertinent to mention here that it was decided in judgment of the Honorable Peshawar High Court, Peshawar reported on 2018 PLC (C.S) Note 112, "The law will take its recourse and no deviation is permissible nor this court will allow any to take arbitrary decision in violation of law and rules". Also supports its version by following famous reported judgment of the August Supreme Court of Pakistan titled as "Tariq Aziz ud Din and other" cited as 2010 SCMR 1301, which provides that "Actions must be based on fair, open and just consideration to decide matters more particularly when such powers are to be exercised on discretion". Hence, impugned notification/office order and tentative list are liable to be recalled and revised.

(Copies of the judgments 2018 PLC (CS) Note 112 and 2010 SCMR 1301 are hereby attached as Annexure "H" and "J")

It is therefore most humbly submitted that while, considering facts and circumstances of the instant objection/appeal, impugned Office Order Dated: 09/07/2024 followed by tentative seniority list of the even date may kindly be recalled/withdrawn and old seniority list updated in the year 2021 may kindly be maintained. The objectors shall be highly obliged for this act

S.No.	Name	G. Name	D.O.B	Signature
1.	Im(iaz Ali	Aziz Ullah	10/01/1989	37
2.	Sabir Khan	Momin Khan	13/01/1989	Sme -
3.	Muhammad Sajjad	Amir Wahab	03/03/1989	1300
4.	Tahir Rahman	Ghafoor Rahman	05/03/1989	COAN
5.	Muhammad Arif	Muhammad Ghawas	27/03/1989	Will
6.	Riaz Ali	Muhammad Tahir	06/01/1990	COOP
7.	Hassan Nasir	Sabir Ali	62/03/1995	de
8.	Syed Amjid Ali Shah	Syed Jamai Shah	15/08/1991	(0)

Dated: 22-07- 2024

ATTESTED



OFFICE OF THE ASSISTANT DIRECTOR (Senior)

LOCAL GOVERNMENT &

RURAL DEVELOPMENT DEPARTMENT

MARDAN



No: LG-MRD/Establishment/ 454
Dated: 08.08.2024

OFFICE ORDER:

The competent authority has been pleased to notify the Final Seniority List of Junior Village Secretaries (BPS-09) of Local Govt & RDD, Mardan for Information of all secretaries VC/NC of District Mardan.

Assistant Director (Sr) Local Govt & RDD Mardan

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- 1. PA to Director General, LG&RDD Khyber-Pakhtunkhwa, Peshawar.
- 2. Progress Officers, Tehsil Mardan, Takht-Bhai, Katlang, Rustam & Garhi-Kapoora.
- 3. Supervisor, Tehsil Mardan, Takht-Bhai, Katlang, Rustam & Garhi-Kapoora.
- 4: Office Assistant, LG&RDD Mardan.
- 5. All Secretaries VC/NC District Mardan.

Assistant Director (Sr)
Local Govt & RDD Mardan

adlgmardan1@gmall.com

ATTESTED

FINAL SENIORITY LIST OF SECRETARIES VOINC ON THE BASIS OF MERIT LISTIAGGREGATE+INTERVIEW MARKSI DISTRICT MARDAN

S.Na	Name	Father Name	Date of Dirth	Appointment Date	Current Post	Remarks	Marks
1	Muhammad Arif	Fakhr uz Zaman	04.04 1991	, 23.02.2016	23,02,2016	Appointed as Secretary (BPS-7) on 23,02,2016	85.5
2	Lizgat Ali	Deedan Gul	13.02 1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	85
3.	Ilısan Uddin	Burhan Ud Din	15.03.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016 .	85
4	Waseem Shah	Nadar Sliah	25.04.1989	23,02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	84.5
5	Jafar Khan	Gul Rehman	07.01.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02,2016	84.5
- 6	Tahir Hussain	Akhar Hussain	11,02,1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	84
7	Imran Khan	Alam Zeb	12,04,1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02-2016	83.5
8	Muhammad Asghar Khan	Gul Rosh	12.04,1990	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83.5
9	Shahan Khan Naqi	Muhammad Nagi	08.04.1994	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83.5
10	Hamad Ali	Niaz Ali	20,03.1990	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
11	Sajjad Alzal	Afzal Khan	01.04.1990	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
12	Muhammad Abbas	Zahid Gul	10.01.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
13	Asif Ali Shah	Schat Shah	16.02.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
14	Waqas Khan	Riaz Khan	3 21.04.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	- 83
. 15	Naik Wali	Sher Wali Khan	10.04.1989	23.02.2016		Appointed as Secretary (BPS-7) on 23.02:2016	. 82.5
16	Numan Khan	Fazal Mir	25.03.1989	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	82
17	Uhaid Ür Rahman	Saif ur Rahman	15.04.1989	23,02,2016		Appointed as Secretary (BPS-7) on 23.02.2016	82
18	Yaseen Ahmad	Noor Muhammad	12.12.1991	23.02,2016		Appointed as Secretary (BPS-7) on 23.02.2016	82
19	Hazrat Umar	Khan Bahadar	11.04.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	82
. 20	Anwar Ali	Sabz Ali	15.04.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	82
21,	Ináyat Ur Rahman	Bakht Zada	30.03:1991	.23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	2.18
22	Waqas Khan	Sheryar	07.03.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	81.5
23	Muliammad Zeb	Rahim Gul	23.03.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	81.5
24	Muhammad Sajjad	Amir Wahab	03.03.1989	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	81
25	Hamair Ali	Gul Sher	04.04.1991	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	81
26	lmran Khan	Hussain Muhammad	10.04.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	80.5
27	Gul Wahab	Muhammad Yer	04,05.1993	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	80.5
_ 28	Bilal Khan	Akmal Khan	17.01.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	80
29	Muhammad Zeeshan	Lal Mir	20.04.1994	23.02.2016		Appointed as Socretary (BPS-7) on 23.02,2016	80
30	Muhammad Ibrahim	Tilawat Khan	05.04.1991	23.02.2016	23,02.2016	Appointed as Secretary (BPS-7) on 23.07.2016	79.5

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31	Habib Ullah	Kifayat Ullah	05.08.1992	23.02.2016	23.02.2016	1	t '
32	Musawir Khan	Wazir Gul	03.03.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	79
33 ·	Nasir Khan	Mehraban Shah	21.01.1991	23.02.2016	23.02.2016	Appointed at Secretary (BPS-7) on 23.02.2016	79
34	Tariq Shah	Syed Wali Shah	22.06.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	78.5 78
35	Basit Ali	Muhammad Ali	29.04.1995	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	77.5
36	Salman Akhtar	Ámir Ud Din	16.03.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	77
37	Abdullah Shah	Muhammad Shah	20.03.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23,02,2016	77
38	Asif Khushal	Khushal Khan	22.04.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	76
39	Sami Ullah	Sher Zada	04.08.1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 21.02.2016	76
40	Aria Ur Rahman	Meher Gul	03.04:1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5
41	Adil Khan	Bashir Ahmad Khan	15.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5
42	Ibad Ullah	Darwish Khan	06.04.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23:02:2016	75.5
43	Akliar Ali	Abdul Samad	02.02.1995	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5
44	Nascer Khan	lafar Khan	02.05.1994	23,02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02,2016	75
- 15	Faroog Badshah	Saleh Badshah	. 15.08.1994	23,02,2016		Appointed as Secretary (BPS-7) on 23.02.2016	75
-16	Muhammad Sagib Khan	Raheem Khan	15.04.1991	23,02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5
u,47	Muhammad Adil	Abdul Qadir	25.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02:2016	74.5
48	Muhammad Salman	Hussain Khan	24.01.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74
19	Aman Khan	Waheed Ullah	06.04.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74
50	Muhammad Asad Zia	Farman.	05.03.1990	23,02,2016	.23,02,2016	Appointed as Secretary (BPS-7) on 23.02.2016 .	74
51	Farhad Ali	Liaqet Ali	03.04.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74
52	Muhammad Junaid	Muhammad Yaseen	03.01.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74
53	Noman Sadiq	Noor Badshah	01.04.1995	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74
54	Ali Raza	Nisar Muhammad	15.12.1990	23.02.2016	23,02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	73.5
55	Shahid Hussain	Shahbaz Khan	01.01.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	73.5
56	Muhammad Imran	Said Ahmad Jan	12,12,1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	73
57	Mubassar Shah	Fazle Malik	18.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	73
, 58	Muhammad Waqas	Sheikh Muhammad	20.02.1996	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	73
\$ 59	Tahir Rahman	Ghafoor Rahman	05,03,1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5
60	Syed Bilawal Hussain	Syed Bashir Hussain	25,09,1990	23,02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5
61	Muhammad Arif	Mir Alam	12,02,1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5
62	Muhammad Zaib	Faiz Muhammad	08.04.1992	23.02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5
63	Abdul Haseeb	Hazrat Umor	04.05.1993	23.02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5
64	Arshad Afi	Jan Syed	17.03.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72
65	Salman Ullah	Pir Muhammad	13.03.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72
66	Ishfaq Ali	Muhammad Irshad	20.10.1994	23,02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72
67	Abrar Ahmad	Pazir Gul	12,02,1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	71.5

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	Syed Amjid Ali Shah	Syed Jamal Shah	15.08.1991	** 23.02.2014\	LIPERIOR MANAGEMENT OF CONTRACT CONTRAC	71.3
69	Zahid Hustain .	Gul Zoda	09.02.1991	23.02.2010	23.02.2016 Apprinted as Secondary (BPS-7) on 23.02.2010	
70	Zakir Khan	Tażn Gul	17.03.1991	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	7) -
. 71	Haider Sh er	Umar Sher	- 15.03.1993	. 23.02.2016	23.02.2016 · Appointed as Secretary (BPS-7) on 23.02.2016	71
	Muhammad Sahib	Namoos Lihan	01.05.1994	23.02.2016:	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	71, ,
73	Muhammad Yequb	Muhammad Ibrahim	12.01.1992	23,02,2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2018	70.5
74	Irlan Khaa	Fazli Qadar	28,08,1990	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	70
75	Mohsin Khan	Hassan Khan	01,08,1991	23,02,2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	70
76	Dila1 Khan	Alam Zeb Khan	. 15.01.1993	23.02.2016	23.02.2016; Appointed as Secretary (BPS-7) on 23.02.2016	,70
77	Muhammad Islam,	Aniyar Zeb .	' DS.05.1993, ·	23.02.2016	23.0220.0 [Abbana & Section ()	68.5
. 78	Gul Taj	Zahir Taj	. 01.03.1990	- 23,02,2016 `	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	67
579	Imtiaz Ali	Aziz Ullah	10.01.1989	23,02,2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016.	66
. '80	Junaid Ur Rehman	Kifayat Ullah	. 01.07.1991	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	65
81	Syed Saif Ullah	Sycd Ahmad	30.04.1994	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	65
82	Syed Feroz Shah	Syed Jamal Shah	25,04,1992	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	64.5
83	Sajjad Ali	Syed Hussain	15.01.1996	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	64.5
84	Muhammad Asif	Ghulam Hussain	. 31.03.1991	23.02.2016		63.S .
. 85	Amin Ul Haq	Mumtaz Khan	30.05.1992	23.02,2016	23.02.2016 Appointed as Secretary (BPS-7) ort 23.02.2016	63,5
86	Muhassir Khan	Bakht Toj	05.09.1993	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	63.5
8.7	irfan Ullah	Khalid Khan	. 10,05.1994	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	62 · ,
88	Ríaz Ali	Muhammad Tohir	- 06.01.1990	23.02.2016	23.02.2016 · Appointed as Secretary (BPS-7) on 23.02.2016	61.5
89	Sajid Khan	Syed Zaman	05.02.1990	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	61.5
90	Imad Nacem	Fazli Nacem	10.03.1992	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	6 l
91	Muhammad Arif	Muhammad Ghawas	27.03.1989	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	60.5
92-	Sabir Khan	Marpin Khan	- 13.01.1989	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	60 -
93	Fawad Ahmad	Niaz Muhammad	16,03,1995	23:02:2016		57 、
94	Hassan Nasir	Sabir Ali	02.02.1995	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	54.5 .
95	Fawad Ali	lmtiaz Khin	17.03.1992	23.02.2016	23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	49 .
96	Wajid Ali	Ali Halder	10.02.1987	02.05.2016	02.05.2016 Appointed as Secretary (BPS-7) on 02.05.2016	84
97	Muhammad Anas	Mukhtiar Hussain	04.02.1991	20.05.2016	20,05,2016 Appointed as Secretary (BPS-7) on 20,05,2016	81
98	Fida Muhammad Khan	Sajad Ali	22/01/1992 -	20.05.2016	20.05.2016 Appointed as Secretary (BPS-7) on 20.05.2016	61
.99	Zakir Khan Dacha	Muhammad Umar	13/02/1990	20.05.2016	20.05.2016 Appointed as Secretary (BPS-7) on 20.05.2016	76
100	Liagat Slah	Sarforaz Khan	G/11/1994	20.05.2016	20.05,2016 Appointed as Secretary (BPS-7) on 20.05,2016	71
101	Shawakar Ali	Shah Pasand Khan	13/04/1991	20.05.2016	20.05.2016 Appointed as Secretary (BPS-7) on 20.05.2016	.70
102	Jamil Khan	Muhammad Khan	10/02/1994	20.05.2016	20.05.2016 Appointed as Secretary (BPS-7) on 20.05.2016	707
103	Muhammad Ali	Taj Wali Shah	31/03/1991	20.05.2016	20.05.2016 Appointed as Secretary (BPS-7) on 20.05.2016	69
104	Khaista Rahman	Multan	2/03/1991	20,05.2016	20.05.2016 Appointed as Secretary (BPS-7) on 20.05.00 %	6S.S
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105	Noman Jamal	Jamal Abdul Nasir	. 1/08/1995	20.05.2016 -	20.05.2016	Appointed as Secretary (BPS-7) on 20.05,2016	64.5
106	Shah Faisal	Akinol Khan	1/02/1992	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 2003-2010	63.5
107	Zia Ul-Haq Adili	Amin'Ul Haq	30/03/1991	23.05.2016	23.05.2016	Appointed as Secretary (BPS-7) on 23.05.2016	
108	Tagweem UI Hay	Anwar Ul Ilaq	23/05/1993	15.09.2017	15,09,2017	Appointed as Secretary (BPS-7) on 15:09:2017.	
109	Atad Ali	Feroz Shan	17.01.1990	25.09.2017	25/09/2017	Appointed as Secretary (BPS-7) un 25.09.2017.	
110	Jehangir Shah	Maroof Shah	05.01.1989	23.62.2018	23/02/2018	Appointed as Secretary (BPS-7) un 23.02.2018	<u>, , </u>
111	Taimoor All Shah	hayat Ali Shah	02.05.1998	30.11.2018	30.11.2018	Applitud as Sceretary (BPS-7) on 30.11.2018 under deceased son quata	,
112	Mohib Ullah	Hamish Gul	15.03.1971	02.05.1990	30,04,2019	Promoted to Secretary (BPS-9) on 30.04,2019	. •
1113	Arshad Hussain	Fagir Hussin	03.04.1974	25.07.1993	30.04.2019	Promoted to Secretary (BPS-9) on 30.04.2019.	```
	Dil Raj Khan	Shamshad Khan	12.04.1973	16 03:1994~	· 30.04:2019-	Promoted to Secretary (BPS-09) on 30.04.2019	
114		Jamshid Muhammad		18.05.1994	30/04/2019	Promoted to Secretary (BPS-09) on 30.04.2019	-:-
115	Zakir Muhamamd	Muhammat Rahim	12.07.1971	01.01.1995	/30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019,	
116	Muhammad Salim	Muhammad Aslam	04.02.1983	20/10/2005	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	
117	Muhammad Zaman		20,04.1977	22.04,2013	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	-
1 118	Bashir Muhammad	Dilawar Khan	11.02.1992	22,04,2013	30.04,2019	Promoted to Secretary (BPS-09) on 30.04.2019	
119	Umar Farooq	Saif Ur Rehman	02.10.1977	03.04.2015	30.04.2019	Promoted to Secretary (BPS-09) on 30,04,2019	
120	Muhammad Mustafa	Miraj Muhammad	11.05.1979	03.04.2015	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	
121	Sami Ullah	Aman Ullah Khan	15.01.1989	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	136
122		Shams Ui Qamar	03.03.1990	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	135.5
123	Muhammad-Imran	Muhammad Parvez	25.04.1993	05.07:2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	128_
124	Nouman	Ghulam Rasoni	01.09.1993	05.07.2019		Appointed as Secretary (BPS-9) on 05.07.2019	127
125		Ensan All	07.04.1995	05.07.2019		Appointed as Secretary (BPS-9) on 05.07.2019	127
126		Siraj Ur Rehman		05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	126.5
127		Abdul Qayum Khan	20.08.1987	05.07.2019	05.07.2019	Appointed as Secretary, (BPS-9) on 05.07.2019	125
128		Noor UI Haq	09.03.1992	. 05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	125_
129		Jala Ud Din	- 05.03.1994	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	125
. 130	Wisal Muhammad	Gul Nabi	17.06.1999	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	118.5
131	Muhammad Taimoor khar	Gul Bahadar	05.03.1992	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	117.5
132	Sajad	Aman Ullah Khan		05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019'	115
133	Farhad Ali	Raham Sala Khan	03.02.1985		05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	114
134	Farhad Ali	Murad Ali	06.02.1995	05.07.2019		Appointed as Secretary (BPS-9) on 22.07.2019 under	
_		Zul ligar Ali	02.02.2000	22.07.2019	22,07,2019	deceased son quota.	Son qua
133	Muhammad Abbas Khan	<u> </u>	25,04.1996	26.07.2019	26.07.2019	Appointed as Secretary (BPS-9) on 26.07.2019	121
130	Sadam Hussain	Rahim Gul	24.03.1995	18.05.2020	18.05.2020	Appointed as Secretary (BPS-9) on 18.05.2020	128
, (3)	1.	Mocen Ud Din	10,09,1994	18.05.2020	18.05.2020	Appointed as Sterretary (BPS-9) on 18.05,2020	114
131	Zeeshan Ahmad	Zahir Shah		12.12.2017	05,06,2020	Promoted to Secretary (BPS-9) on 05.06 2020	
139	Adnan Khan	Fazli Rehman	29.03.1993	19.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.1020	Γ.
14		Nihar Muhammad	18,04,1992	13.12.2011	U3.08.2020		
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141	lflikhar	Shamshad Khan	05.02.1979	21.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
142	Ibad Ullah	Abid Ullah	04.04.1997	21.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
143	Muhammad Tufail	Ghani Rahman	07:05.1998	22.12.2017	05.06,2020	Promoted to Secretory (BPS-9) on 05.06.2020	
144	Wascem Ullah	Fazai Wahab	06.10,1992	26.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	[
	Muhammad Hyas	Munammad lqbal	01.04.1996	26.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
	Mushtag Ahmad	Muhammad Aziz	01.04.1994	01.01:2018	, 05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
	Kamran Khan	Hazrat Hossan	02.02.1977	28,02,2018	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
148	Sajjad Ali	Muhammad Gul	01.01.1983	28.02.2018	.05.06.2020	Promoted to Sécretary (BPS-9) on 05.06.2020	
		Shah Pasand Khan	07.03.1986	28.02,2018	05,06.2020	Promoted to Secretary (BPS-9) on 05.06,2020	<u> </u>
149	Shoaib Khan		H.11,1993	28.02.2018	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
150	Mansoor Khan	Amir Zada	28.02.1999	26.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
151	Ayaz Ur Rehman	Fayaz Ur Renman	20.02.1999		F	(DDD 0) 05 06 7070 and	Son quota
152	Pir Hamza Sohail	Muhammad Sohail	24.03,2002	05.06.2020	05.06.2020	medical son quala.	Juli danu
	0 Market	Mushtag Masih	24.07.1992	16.09.2021	16.09.2021	Appointed as Secretary (BPS-9) on 16.09.2021	80
153	Sunny Mushtaq	Younas Masih	15.03.2002	16.09.2021	16.09.2021	Appointed as Secretary (BPS-9) on 16:09:2021	78
154	Ayub Masih		01.06.1992	16.09.2021	16,09,2021	Appointed as Secretary (BPS-9) on 16.09.2021	- 77
155	Danial Adison	Sajid Raza	27.03.1990	14.10.2021	14,10,2021	Appointed as Secretary (BPS-9) on 05.06.2020 under	Son quota
156	Salman Ali Khun	- Mumtaz Ali Khan	27.03.1990	1 . 17,10,2021		11 (1)	

Assistant Director (Senior)
Local Govt & Rural Development
Mardan

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BEFORE THE OFFICE OF WORTHY DIRECTOR GENERAL LOCAL GOVERNMENT AND RURAL DEVELOPMENT DEPARTMENT, KHYBER PAKHTUNKHWA

"K"

In the Matter:

Office Order bearing No. LG-MRD/Establishment/3832, Dated: 09/07/2024 (Tentative Seniority List)

Subject:

Apeal against the Office Order bearing No. LG-MRD/Establishment/3832, Dated: 09/07/2024 (Tentative Seniority List) & Final Seniority List issued on 08/08/2024 of Assistant Director Mardan, Regarding Objection Rejection.

Respected Sirl

Facts in Brief:

The appellant humbly submit as under;

- 1. That, the appellant are servants and performing their duties honestly, devotedly and faithfully since their initial appointments on 23/02/2016 as junior secretaries' village and neighborhood councils in their respective VC/NCs.
- 2. That, upon initial appointment of the appellant along with other recruited official of the department a seniority list was prepared and updated from time to time after promotions and finally in light of a circular of Haripur having entirely different situations issued the instant impugned list by your good office against the Rule 17(4) proviso of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 and the appellant/appellant were placed from top to bottom of the merit list.

(Copies of the office order and impugned tentative list are hereby attached as Annexure "A" and "A-I")

3. That, the appellant being aggrieved from above mentioned Office Order No. Office Order bearing No. LG-MRD/Establishment/3832, Dated: 09/07/2024 (Tentative Seniority List) of your good self, following order no. Director (LG) 3-l/Establishment/2022/4978-94, Dated: 15th November, 2022 of the Directorate General Local Government & Rural Development Department Khyber Pakhtukhwa have no other adequate relief but to approach before your good self for their redressal on the strength of following grounds:

GROUNDS:

A. That, All of the secretaries of village and neighborhood councils were initially appointed on 23/02/2016 vide a single order evident from the list of initial appointments followed by final seniority list which was not objected by anyone hence, got finality and vide Office Order No. /AD/LG&RDD/MRD/ESTAB/Promotion/2021/237, Dated 08/11/2021

about 30 persons were promoted on the basis of Rule 17 (4) in about 30 per sentority by older age and the appellant were left on top of the list. Therefore, impugned list is against the law and rules and liable to be set aside.

(Coplex of Office Order Dated: 08/11/2021 and both Hits are hereby attached as Annexure "B", "C" & "C.1"

- B. That, impugned order dated: 09/07/2024 is upshot of misconstraing order No. Director (LG) 3-VEstablishment/2022/4978-94, Dated: 15th November, 2022 of the Directorate General Local Government & Rural Development Department Khyber Pakhtukhwa for the reasons that in the said order/notification there was issue of having different dates of their initial appointments however, in case of the appellant all of the promotes and affected persons have same dated of appointment. Therefore, in the present case Rule 17 1(a) is not applicable rather than rule 17 (4) is applicable hence, impugned order and notifications are liable to be set aside and old list of promotion be maintained as per law and rules.
 - C. That, needless to mention here that there are several examples of the promotions on the basis of the rule 17 (4) of this department and other Director Notification No. 1/Establishment/2017/10803, Dated: 28th February, 2018 of the Director General Local Government and Rural Development Department Khyber Pakhtunkhwa, it was clarified that all the promotions shall be made in accordance with Section 17 (4) of the Khyber Pakhtunkhwa Civil Servants (Appointments, Promotion & Transfer) Rules, 1989, so in such eventuality notification of Assistan Director Mardan, following notification/office order Dated: 15 November, 2022 are liable to be recalled and old list of seniority be maintained.

(Copy of the notification Dated: 28/02/2018 is hereby attached as Annexure "D")

D. That, needless to mention here that this Department has already followed Section 17(4) of the ibid rules in recent promotion of Office Assistants/Senior Scale Stenographers (BPS-16) in its Notification No. DG(LG)/Seniority List/OA&SS/2023/6296-6302, Dated: 18/10/2023, of Director General Local Government & Rural Development Khyber Pakhtunkhwa, which further clarifies that impugned letter/notification and seniority list were prepared and issued in post haste manners.

(Copy of the notification Dated: 18/10/2023 is hereby attached as Annexure "E")

E. That, similarly there are other notifications and judgments upon promotions in several departments further supports version of the appellant on the score of age wise seniority as envisaged under section 17 (4) of the ibid rules. For reference of your good self, Application No. SO(Primary-M)E&SED/4-7/Seniority of PST under Court Act, 2017/Court Case/2024, Dated: 26/06/2024 in pursuance of Letter No. 3656(AD Lit-II), Dated: 09/01/2024, responded by Law, Parliamentary

(OP)/LD/15-2/2023/KC/7405-7408, Dated: 20/05/2024 coupled with Judgment of the Honorable Peshawar High Court, Peshawar in Service Appeals No's, 2070/2019 to 2079/2019, instituted on 23/12/2019, Decided on 31/05/2023. All of the these referred notifications and Judgment provides that seniority is determined based on their continuous service within the endre and if two or more employees have the same date of continuous service the employee older in age is to be considered senior to younger one. Hence, impugned order/notification seems output of blased and post haste manner following mis-reading and non-reading of available record, rules and law. Thus, liable to be recalled/revised.

(Copies of the notifications, services appeals are hereby attached as Annexure "F", "F-1", "F-2" and "F-3")

F. That, it is pertinent to mention here that it was decided in judgment of the Honorable Peshawar High Court, Peshawar reported on 2018 PLC (C.S) Note 112, "The law will take its recourse and no deviation is permissible nor this court will allow any to take arbitrary decision in violation of law and rules". Also supports its version by following famous reported judgment of the August Supreme Court of Pakistan titled as "Tariq Aziz ud Din and other" cited as 2010 SCMR 1301, which provides that "Actions must be based on fair, open and just consideration to decide matters more particularly when such powers are to be exercised on discretion". Hence, impugned notification/office order and tentative list are liable to be recalled and revised.

(For Reference 2018 PLC (C.S) Note 112 and 2010 SCMR 1301)

It is therefore most humbly submitted that while, considering facts and circumstances of the instant appeal, impugned Office Order Dated: 09/07/2024 followed by tentative seniority list of the even date may kindly be recalled/withdrawn and old seniority list updated in the year 2021 may kindly be maintained. The appellant shall be highly obliged for this act of kindness.

Name	Father Name	D.O.B	Signature
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Dated: -08- 2024

AFFIDAVIT:

It is solemnly affirmed and declared that all the contents of the above mentioned objection are true and correct to be best of our knowledge and belief and nothing has been concealed from your good self. Moreover, no such like objection has been preferred earlier and we (the deponents) appoint and authorize Mr. Imtiaz Ali as Power of Attorney for pursuing this objection and all the connected matters with this objection,

Deponents



DIRECTORATE GENERAL LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT KHYBER PAKHTUNKHWA

To

No. Director (LG) 3-1/Establishment/2024 Dated Peshawar the, 19th September, 2024

- Mr. Imtiaz Ali
 - Junior Village Secretary (BPS-09), District Mardan.
- 2. Mr. Tahir Rehman
- Junior Village Secretary (BPS-09), District Mardan.
- Muhammad Arif
 - Junior Village Secretary (BPS-09), District Mardan.
- 4. Muhammad Salman
 - Junior Village Secretary (BPS-09), District Mardan.
- 5. Mr. Sabir Khan
 - Junior Village Secretary (BPS-09), District Mardan.

Subject:

COMPLAINT AGAINST THE RECENT SENIORITY LIST BEARING LOOPHOLES.

I am directed to refer to the subject cited above and to state that the appeal submitted to this office regarding formulation of seniority list is bereby regretted as the Assistant Director (Senior) LG&RDD District Mardan issued final seniority list vide Office Order dated 08.11.2024 in accordance with Rule 17 (1) (a) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

> ASSISTANT DIRECTO (ADMIN/HR LG&RDD

Endst: No. & date even: Copy forwarded to the:

1. PA to Director General, LG & RDD, Khyber Pakhtunkhwa.

ASSISTANT DIRECTOR LG&RDD

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Appeal	_No/20 <u>2</u> 4
Muhammad Agi	(APPELLANT) (PLAINTIFF) (PETITIONER)
Gout of KPll I/W/e M. Ant	(RESPONDENT)(DEFENDANT)
Do hereby appoint and constitute Advocate Supreme Court to withdraw or refer to arbitro Counsel/Advocate in the above refer his default and with the author Advocate Counsel on my/our Advocate to deposit, withdraw a sums and amounts payable or deabove noted matter.	appear, plead, act, compromise, ation for me/us as my/out noted matter, without any liability prity to engage/appoint any other cost. I/we authorize the said and receive on my/our behalf all
Dated/202	CLIENT
	ACCEPTED
	NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT
•	WALEED ADNAN
& ·	UMAR FAROOT MOHMAND
	KHANZAD GUL

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ADVOCATES