FORM OF ORDER SHEET

Court of	 		
		-	

	' Court o	f	
	Ар	peal No. 1624/2024	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge	
1,	2	3	· · · .
1-	27 /09/2024	The appeal of Mr. Tahir Rehman pre by Mr. Noor Muhammad Khattak Advocate. It	
		preliminary hearing before Single Bench at 1 01.10.2024. Parcha Peshi given to counsel for the	Peshawar on
		By order of the Chai REGISTRAN	rman

THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. CHECK LIST

MR. TAHIR REHMAN

V/S

DIRECTOR LG&RDD

<u>s</u>	CONTENTS	YES	NO
NO	,	11.0	NO
1.	This petition has been presented by: Noor Muhammad Khattak Advocate Supreme Court	1	
2.	whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	1	
3.	vvrietner appear is within time?	1	
4.	Whether the enactment under which the appeal is filed mentioned?	+ 👉	
5.	Whether the enactment under which the appeal is filed is correct?	17	
6.	vinetner affidavit is appended?	1	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	1	
8.	Whether appeal/annexures are properly paged?	1	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	1	
10.	whether annexures are legible?	1	
11.	Whether annexures are attested?	<u> </u>	
12.	Whether copies of annexures are readable/clear?	1	
13.	Whether copy of appeal is delivered to AG/DAG?	1	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by	<u> </u>	
	petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	1	
16.	Whether appeal contains cutting/overwriting?	×	,
17.	Whether list of books has been provided at the end of the appeal?	1	
18.	Whether case relate to this court?	7	 :
19.	Whether requisite number of spare copies attached?	7	
20.	Whether complete spare copy is filed in separate file cover?	 	
21.	Whether addresses of parties given are complete?	7	
22.	Whether index filed?		
23.	Whether index is correct?	1	·
24.	Whether Security and Process Fee deposited? On	1	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along		
!	with copy of appeal and annexures has been sent to respondents? On	1	
26.	Whether copies of comments/reply/rejoinder submitted? On		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On		
]			
It is a	artified that formalities /december 1		- 1

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

Name:- Noor Muhammad Khattak, ASC

D-1 1	
Dated:-	

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL No 1624 / 2024

MR. TAHIR REHMAN

V/S

DIRECTOR LG&RDD

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	Copy of Office order dated		11-17
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5.	Copy of seniority list	E	22 - 2子
6.	Copy of the letter dated 07/02/2023	F	28
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APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK ADVOCATE SUPREME COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL No. 1624 -P/2024

Mr. Tahir Rehman, 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

Praver:-

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 37 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 6 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
8.	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

- 9. That feeling aggrieved from the impugned final seniority list, the appellant filed departmental appeal before the respondent No 1, but the same has been rejected vide appellate order dated 19/09/2024 on no good ground. Copies of departmental appeal and appellate order dated 19/09/2024 are attached as annexure......
- 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: 25-0\(\beta\)-2024

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK ADVOCATE SUPREME COURT

UMAR FAROOQ MOHMAND

WALEED ADNAN

KHANZAD GUL

CERTIFICATE:

ADVOCATES HIGH COURT

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

Advocațe

<u>AFFIDAVIT</u>

I, Tahir Rehman, 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 lightly ble Tribunal.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNA PESHAWAR.

SERVICE APPEAL NO / 2024 MR. TAHIR REHMAN 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:

- That the above-mentioned appeal along with this 1application has been filed before this august service Tribunal in which no date has been fixed so far.
- That appellant filed the above-mentioned service appeal 2against 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.
- That the impugned seniority list has been issued by the 4respondents 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 SUPRÉME COURT

AFFIDAVIT:

I, Tahir Rehman, (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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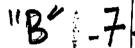
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Headquarters: L-E, Stroet No.46, 1-673, Islamabash Mational Testing Service-Pakistan







OFFICE OF THE DEPUTY COMMISSIONER MARDAN

No._604/DC (M) Dated Mardan, the: 23/62/2016

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:

Sr	.# Name	Father Name		
1	Table B. I		D.O.B	Appointed for VC/NC
	Tahir Rahman	Ghafoor Rahman	05-03-1989	Rorya-1
2	Syed Bilawal Hussain	Syed Bashir Hussain	25-09-1990	Rorya-2
3	Salmanullah	Pir Muhammad	15-03-1993	Bakyana
4	Hamad Ali	Niaz Ali	20-03-1990	1
5	Muhammad Asad zia	Farman-ud-Din	05-03-1990	1
6	Muhammad Abbas	Muhammad Shafi	07-10-1988	,
7	Muhammad Arif			
8	Wagas Khan	Muhammad Ghawas	27-03-1989	Kaskoroona-1
9		Riaz Khan	21-04-1992	KasKoroona-2
L	Nasir Khan	Mehraban Shah	19-01-1991	KasKoroona-3
10	Yaseen Ahmad	Noor Muhammad	12-12-1991	Khazana Dheri-1
11	Arshad All	Jan Sald	17-03-1991	Khazana Dheri-2
12	Tahir Hussaln	, Akbar Hussain	11-02-1990	Sheikh Yousaf-1
13	Syed Amjid Ali Shah	Syed Jamal Shah	15-08-1991	Sheikh Yousaf-2
14	Ammar Hassan	Gulzar Ali	23-09-1992	Bughdad Rural-1
15	Urnar Hayat	Nadir Khan	31-10-1987	
16	Mubassar Shah	Fazle Malik		Bughdad Rural-2
17	Junid Rahman		18-03-1992	Chamtar Dheri
18	1	Kifayatullah	01-02-1991	Dagai-1
	Muhammad Ismall	Sher Muhammad Khan	02-2-1993	Dagai-2
19	Muhammad Junid	Muhammad Yaseen	03-01-1992	Bagh-e-Irum-1
20	Habibullah	Niaz Nabi	15-04-1986	Bagh-e-Irum-3
21	Tamioor Khan	Abdul Sattar	· []	Chak Toru
22	Muhammad Iltaf	Muhammad Khursheed		
	<u> </u>	1	00 1332	Khawaja Rashaka

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23	Imtiaz Ali			
		Azizullah - 8	10-01-1989	Bakri Banda
- 24	· · · · · · · · · · · · · · · · · · ·	Khan Bahadar	11-04-1992	? Khanjar
25	Amjid Khan	Munir Khan	22-02-1993	Maho Dheri
26	Syed Rashid Ali Shah	Syed Farooq Shah	17-07-1991	Behram Khan Killi
27	Sabir Khan	Momin Khan	13-01-1989	Koragh
28	Faiz-ul-Islam	Falz-ur-Rahman	19-09-1986	Chowki
29	Naseer Khan	Jafar Khan	02-05-1994	Ghala Dher
30	Farhad Ali	Liagat All	03-04-1990	Khawo
.31	Raid Ali	Muhammad Ali	16-03-1990	Hoti-3
32	Haider Sher	Umar Sher	15-03-1993	
33	Ali Raza			Guli Bagh-1
-		Nisar Muhammad	15-12-1990	Bicket Gunj-1
34	Shahan Khan Nagi	Muhammad Nagi	08-04-1994	Bicket Gunj-3
35	Zahoor Ali	Rigab 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	Mohib Banda-2
40	Atta-ur-Rahman	Meher Gul	04-03-1991	Kandar
41	Sadiq-ur-Rahman	Raj Muhammad	04-01-1988	Qasim
42	Asad Aii	Karim Khan	01-11-1990	Sharif Abad
43	Bilal Khan	Akmal Khan	17-01-1992	Alla Dad Khel-2
44	Muhammad Imran	Said Ahmad Jan	12-12-1989	Chak Hoti
45	Shah Fahad	Gul Rahman	03-01-1988	Shahmat Pur-1
46	Court Case		-	Shahmat Pur-2
47	Ishfaq Ali	Muhammad Irshad		Geeder
48	Muhammah Haris Amin	Rooh-ul-Amin		Baghicha Dheri-1
49	Gul Taj	Zahir Taj		
50	Imad Naeem			Baghicha Dheri-2
		Fazii Naeem	03-10-1992	Garhi Dolat Zai-1
51	Akbar Ali	Abdul Samad	02-02-1995	Sarhi Dolat Zai-2
52	Zahoor Muhammad	Fazal Muhammad	81-03-1988	Garhi Ismail Zai-2
53	Salman Akhtar	Ameeruddin	16-03-1991	Sujar Garhi-1
<u>-</u>		<u> </u>		

M. Non

54	Ihsanuddin		— <u> </u>	
		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	Ihsanullah	Obaldullah	01-03-1989	Saro Shah
59	Yasir Arafat	Said kareem	04-03-1991	Shah Baig
60	Hammad Ahmad	Husnulabrar	11-04-1992	Afzal Abad
61	Wasim Shah	Nadir Shah	25-04-1989	Pir Abad
62	Shad Muhammad Khan	Muhammad Kamai	18-03-1989	Arabi Banda
63	Muhammad Zeeshan	Lal 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
67	Ismail	Ahmad	02-02-1987	Pat Baba-2
68	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 Sadl-2
82	Muhammad Ibrahim	Tilawat Khan	05-04-1991	Qutab Garh
83	Asad Ali	All Rahman	11-02-1987	Sher Garh-2
84	Khalid Hameed	Fazal Gul	<u> </u>	Sher Garh-3
			<u> </u>	

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85	Taimoor Shah	Wali Muhammad	23-12-1988	Hathian-1
86	Muhammad Farooq Shah	Muhammad Zahir Shah	20-11-1976	Hathlan-2
87	Sajjad Afzal	Afzal Khan	01-04-1990	Hathian-3
88	Gul Wahab	Muhammad Yar	04-05-1993	Makory-1
89	Anwar All	Sabz Ali	15-04-1992	Макогу-2
90	Abdul Haseeb	Hazrat Umar	04-05-1993	Makory-3
91	Numan Khan	Fazal Mir	25-03-1989	Lund Khwar-1
92	Hafiz Janas khan	Khan Sher	01-01-1987	Lund Khwar-2
93	Ubaid-ur-Rahman	Safi-ur-Rahman	15-04-1989	Lund Khwar-3
94	Fawad Ali	Imtiaz Khan	17-03-1992	Jalaia-1
95	Komail Hamza	Adam Khan	17-02-1986	Jalala-2 Disable
96	Ihsanullah	Nadir Khan	15-01-1986	Khan Killi
97	Shafiullah	Attaullah	20-12-1987	Babozai Aba Khel
98	Niaz Muhammad	Muhim Muhammad	09-11-1985	Babozai Barat Khel
99	Asif Ali Shah	Sehat Shah	16-02-1992	Kohi Barmol-1
100	Muhammad Saqib Khan	Raheem Khan	15-04-1991	Mian Khan
101	Irfan Khan	Fazai Qadar	28-08-1990	Sangao
102	Muhammad Adil	Abdul Qadar	25-03-1992	Balzo Kharki-1
103	Saima Bibi	Said Nawab	05-02-1993	Baizo Kharki-2
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 Odi Gram-2
108	Syed Inayat Shah	Mubrak Shah	09-03-1991	Shamozi-1
109	Talmiz-ur-Rahman	Umar Zameen Khan	20-04-1987	Kaloo
110	Sajid Khan	Said Zaman	05-02-1990	Mian Essa
111	Irfanullah	Khaiid Khan	10-05-1994	Mianganoo Killi Disable
112	Court Case			Zareen Abad
113	Muhammad Zeb	Rahmani Gul	23-03-1992	Alo-1
114	Riaz Ali Shah	Qadeem Shah	18-03-1988	Alo-2
115	Abdullah Shah	Mahmood Shah	20-03-1993	Peepal
			<u> </u>	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \

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11	6 Fawad Ahmad	Niaz Muhammad	16-03-1995	Charchoor
11	7 Zahid Ali	Shafiullah	14-02-1988	Dheri
11	8 All Shah	Maqsood Gul	05-06-1989	ľ
11	9 Naik wali	Sher wall Khan	10-04-1989	Likpani
120	Faroog Badshah	Salih Badshah	15-08-1994	Katlang-1
121	Safjad Ali	Ayed Hussain	15-01-1996	
122		Anwar Zeb	05-05-1993	Katiang-3
123	Asif Khushal Khan	Khushal Khan	22-04-1989	Katlang-4
124	Shah Faisal	Sarzamin Khan	19-04-1990	Katti Garhi
125	Syed Waqas Ali Shah	Syed Ghaffar Shah	30-04-1986	Shero-2
126	Zul Qarnain Ahmad Qurashi	Habib Muhammad	01-03-1991	Jamal Garhi-1
127	Umair	Shah Jehan	15-10-1988	Jamal Garhi-2
128	Səjid Ali Jan	Aliah bakhsh	12-04-1988	Rustam-1
129	Abrar Ahmad	Pazir gul	12-02-1991	Rustam-2
130	Muhammad Abbas	Zahid Gul	10-01-1992	Rustam-3
131	Bilat Khan	Alam Zeb Khan	15-01-1993	Beroch
132	Shahid Hussain	Shahbaz Khan	01-01-1992	Landai c
133	Ajmal khan	Umar Khan	02-01-1988	Surkhabi
134	Muhammad Asghar Khan	Gul Rosh	12-04-1990	Ali
135	Muhammad Arif	Fakhruz Zaman		
136	Mubbasir Khan	Bakhtaj		Cheena
137	Waqas Khan	Shehreyar		Jalal Dolat Zai
138	Feroz shah			Machai
139	Imran Khan	Syed Zahir Shah	<u> </u>	Taja
140	Tariq Shah	Hussain Muhammad	10-04-1992	Kher Abad
141		Sáid Wali shah	22-06-1990	Bilandi
	Syed Feroz Shah	Syed Jamal Shah	25-04-1992	Sawal Dher-2
142	Muhammad Shafiq	Mir Zaman	03-10-1988	Babani
143	Muhammad Sajjad	Amir Wahab	03-03-1989 E	Bakhshali-2
144	Riaz All	Muhammed Tahir	01-06-1990 E	Bala Garhi-1
145	Muhammad Salman	Hussain Khan	24-01-1989 B	Bala Garhi-2
146	Hassan Nasir	Haji Sabir Ali	02-02-1995 C	ham Dheri
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Terms and Conditions:

- 1. Their services shall be governed by rules / prescribed Policy of the Government.
- 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.
- Health and age certificate issued by the medical superintendent DHQ Hospital, Mardan be produced before joining the post.
- 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.
- Any other law, rules or instructions issued from Government from time to time would also be applicable.
- 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.

M. 289

-13°

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

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

- 1. 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.
- The Section Officer (Establishment), Local Govt. & Rural Development Department, Khyber 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.

Local Govt and RDD Mardan

		***		IG KOO MAGICO		
		Final	Seniority List of Ju	infor Secretan	GS (BP3-09)	D-marke
S.No	Name	Father Name	Date of Birth App		Current Post	Appointed as Secretary (BPS-7) on 24.12.2011
		Rioz Ahmad	13/04/1950	24/12/2011	29/12/2011	Appointed as Secretary (BPS-7) on 23.02.2016
	Muhammad Feroog Shah	Muhammad Zahli Shah	20/11/1976	23/02/2016	23/04/2010	Appointed at Secretary (BPS-7) on 23.02.2016
		Nadar Mun	10/06/1981	23/02/2016		Appointed as Secretary (BPS-7) on 23:02:2016
		Syed Zihir Shah	02/04/1985	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.7016
		Muhim Muhammad	09/11/1985	23/02/2016		Appointed as Secretary (BPS7) on: 23.02.2016
_		Nadar Khan	15/01/1986	23/02/2015	23/02/2010	Appointed as Secretary (825-7) or 23.02.2016
1	Kumal Hamza	Adam than	17/02/1986	23/02/2016	23/04/2010	Appointed as Secretary (BPS-7) on 23.02.2016
	Abid All	Gul Zāda	20/03/1926	23/02/2016		Appointed as Secretary (BPS-7) or 23:02:2016
	Habib Ullah	NIaz Nabi	15/04/1986	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	Syed Wagas Ali Shah	Syed Ghalar Shah	30/04/1986	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2015
	Fetz Ulislam	Folz Ur Rahman	19/09/1986	23/02/2016	23/02/2010	Appointed as Secretary (BPS-7) on 23,02,2016
	Janas Khan	Khan Ster	01/01/1987	13/02/2016		Appointed as Secretary (BPS-7) on 23.07.2016
_	Ismail	Ahmad	02/02/1987	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016
**	Muhammad Younas	Said Zahir Shah	06/02/1987	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.7016
	Asad All	All Rahman	11/02/1987	23/02/2016		6 Appointed as Secretary (8PS-7) on 23.02.2016
	Talmur Khan	Abdul Sattar	01/03/1987	23/02/2016	23/02/2010	Appointed as Secretary (GPS-7) on 23.02.2016
	Yasir Khan	Sher Zamin	02/03/1987	23/02/2016		6 Appointed as Secretary (BPS-7) on 23.02.2016
18	Seijad Khan	Abdur Rahman	20/04/1987	23/02/2010		6 Appointed as Secretary (8PS-7) on 23.02.2016
	Khalid Khan	Nowsher Khan	12/07/1937	23/02/2010		6 Appointed as Secretary (BPS-7) on 23.07.2016
20	Umar Hayst	Nadifiban	31/10/1987	23/02/2011	23/02/2010	6 Appointed as Secretary (6PS-7) on 23.02.2016
21	Shaû Uljah	Attà Ullah	20/12/1987	23/02/2010		6 Appointed as Secretary (BPS-7) on 23.02.2016
	Amir Zeb	Alam Zeb	25/12/1987	23/02/201		6 Appointed as Secretary (BPS-7) on 23.02.2016
	Ajmai Khan	Umarkhan	02/01/1988	23/02/201	6 23/02/201	6 Appointed as Secretary (BPS-7) on 23.01.2016
24	Shah Fahad	Gul Rehman	01/03/1988	23/02/201	6 23/02/201	6 Appointed as Secretary (8PS-7) on 23.02.2016
15	Muhammad Shafiq	Mir Zaman	10/03/1998	23/02/201		6 Appointed as Secretary (825-7) on 23.02.2016
25	Riaz Ali Shah	Qadeem Shah	18/03/1988	23/02/201		6 Appointed as Secretary (BPS-7) on 23.02.2016
27	Zahoor Muhammad	Fazal Muhammad	31/03/1988	23/02/201	6 23/02/201	6 Appointed as Secretary (BPS-7) on 23.02.2016
28	Sadiq Ur Rehman	Raj Muhammad	01/04/1988	23/02/201		6 Appointed as Secretary (BPS-7) on 23.02.2016
29	Hussein Muhammad Irshad	Zahir Shah	06/04/1988	23/02/201		6 Appainted as Secretary (8PS-7) on 23.02.2016
30		A@ah Bakhsh	12/04/1985	23/02/201	6 23/02/201	6 Appointed as Secretary (BPS-7) on 23.07.2016
31	Ali Shah	Magsood Gul	- 05/01/1989	23/02/201		6 Appointed as Secretary (BPS-7) on 23.02.2016
1 32		Aziz Utah	10/01/1939	23/02/201		6 Appointed as Secretary (BPS-7) on 23.02.2016
33		Momin Khan	13/01/1989	23/07/201		16 Appointed as Secretary (BPS-7) on 23.02.2016
134		Hussain Khan	24/01/1989	23/02/201	C 23/02/201	16 Appointed as Secretary (8PS-7) on 23.02.2016
115		Deedan Gui	13/02/1999	23/02/201		16 Appointed as Secretary (BPS-7) un 23:01:7015
310	_{	Amir Wahab	03/03/1980	73/02/201		16 Appointed as Screenry (BPS-7) on 23.02.2016
16		Ghalaer Galtman	05/03/1969	23/02/201	15 22/02/201	Idiablemica is a demit for a chair and

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Local Govt and ROD Mardan

Г	No	Name	Final S	eniority List o	of Junior Secretari	es (BPS-09)		_
	38	Numan Khan	retrier (value	Date of Birth	Appointment Date	Current Post	Romarks	_
. · · ·		Muhammad Arif	Fazal Mir	25/03/1989	23/02/2016	. 23/02/2016	Appointed as Secretary (8057) on 23.02.2016	-
- 1+		Aman Khan	Muhammad Ghawas	27/03/1989		23/02/2016	Appointed as Secretary (872-7) on 23.02-2016	-
-		Naik Wall	Waheed Ullah	06/04/1989		23/02/2016	Appointed as Secretary (BPS9) on 23-02-2016	4
) -			Sher Wali Khan	10/04/1989			Appointed as Secretary (8/52) on 23:02,2016	-4
_		Imran Khan	Alam Zeb	12/04/1989	23/02/2016	23/02/2016	Appointed as Secretary and 2502,2016	إــــ
· -		Úbaid Úr Rahman	Salf Ur Rahman	15/04/1989	23/02/2016	23/07/2016	Appointed as Secretary (8057) 66, 23 02, 2016	
-		Asif Khushal	Khushal Khan	22/04/1989	13/02/2016	27/02/2016	Appellines as Secretary (MISS) on 2102.2016	_
J		Waseem Shah	Nadar Shah	25/04/1989	23/02/2016		Appointed as Series By 1857 2 of 13.07 2015	ù
<u> </u>		Muhammad linvan	Said Ahmad Jan	12/12/1989	23/02/2016		Appointed as Secretary (BPSZ) 65, 13.02.7016	
-		Rlaz Ali	Mühämmad Tahir	06/01/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-1) on 23.02/2016	_]
<u> </u>		Sajid Khan	Said Zaman	05/02/1990	23/02/2016		Appointed as Secretary (BPS-7) on 23.02:2016	_]
		Tahir Hussaln	Akhar Hussain	11/02/1990	23/02/2016		Appointed as Secretory (BPS/) 69:23.02,2016	3
<u> </u>	_	Gul Taj	Zahir Taj	01/03/1990	23/01/2016	23/02/2016/	ppointed as Secretary (big-rhor) 23:02:2016	\Box
	1	Muhammad Asad Zia	Farman	05/03/1990	23/02/2016	<u> </u>	Abdiured as Secretary (8823) President artis.	_
_	_	hsan Uddin	Bùrtian Ud Din	15/03/1990	23/02/2016	23/02/2016/	ppointed as Secretary (6) 21 on 23.02.2016]
<u> </u>		lamad All	Nlat Ali	20/03/1990	23/02/2016	23/02/2016	ppointed as Secretary (BPS-7) on 23.02.2016	7
<u> </u>		Sajjad Afzal	Afzal Khan	01/04/1990	23/02/2016	23/02/2016	oppointed as Secretary (8/5-7 fon 23.02.2016	7
5.		erhad All	L'âqat Ali	03/04/1990	23/02/2016	23/02/2016	ppointed as Secretary (BPS-7) on 23,02,2016	
5	_	Muhammad Asghar Khan	Gül Rosh	12/04/1990	23/02/2016	23/UZ/ZU16 A	ppointed as Secretary (BPS-7) on 23.02.2016	7
5		eriq Shah	Said Wall Shah	22/06/1990	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23.02.2016	7
58	_	rfan Khan	Fazli Qadar	28/08/1990	23/02/2016		ppointed as Secretary (BPS) on 23 no 2016	7
55	3 5	yed Bilewal Hussain	Syed Bashir Hussain	25/09/1990		23/02/2016 A	ppointed as Secretary (BPS-7) on 23 02 2016	7
60) A	II Raza	Nisar Muhammad	15/12/1990	23/02/2016	<u> </u>	ppointed as Secretary (8PS-V) on 23 07/2016	1
61	J	afar Khan	Gul Rehman	07/01/1991	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23 07-2016	1
62	.]N	lasir Khan	Méhraban Shah	21/01/1991	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-Hom 23 of 2016	1
63	l	unald Ur Rehman	Kifayat Ullah	01/02/1991	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23 ft 2016	1
64		1111	Gui Zada		23/02/2016	23/UZ/2016 A	ppointed as Secretary (BPS/1) on 23 02 2016	1
65			Mir Alam	09/02/1991	23/02/2016	<u>23/02/2016 A </u>	pointed as Secretary (BPS-7) on 23 (2) 2015.	1
66			Pazir Gui	12/02/1991	23/02/2016	43/02/2016 A:	pointed as Secretary (BPS7) no 23 nz 2016	1
67			Amir Ud Din	12/02/1991	23/02/2016	23/02/2016 Ap	pointed as Secretary (8PS-7) on 23 02 2016 /	1
68		-1 -2	Tază Gul	16/03/1991	23/02/2016	73/04/5016 Ab	polited as Secretary (BPS-7) on 23 07 2036	Į۸
69	_	_ 1 4 4 5	Jan Sald	17/03/1991	23/02/2016	23/02/2016 Ap	pointed as Secretary (BPS-1) on 29 or 7016 1-	F
70	In		Bakht Zada	17/03/1991	23/04/2016	23/02/2016 Ap	pointed as Secretary (BP\$7) on 23 02 2016	1
71	М		Ghulam Hussain	30/03/1991		23/02/2016 AD	pointed as Secretary (BPS-7) on 23.02.2016	ſ
77	Ā		Meter Gul	31/03/1991	23/02/2016)	<u> </u>	pointed as Secretary (RPS-71 on 12 07 7016	L
73			Fakhruz Zaman	03/04/1991	23/02/2016	72)07/5019 XD	pointed as Secretary 1895-71 on 23 02 7016	F
74			Gul Sher	04/04/1991	23/02/2016)	23/UZ/2016 Ap	pointed as Secretary (BPS-7) on 23.07 7016	ĺ
			99131161	04/04/1991	23/02/2016	23/02/2016 Ap	pointed as Secretary (BPS-7) on 23.02.2016	

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Appeting a party

Local Govt and RDD Mardan

ΓĒ	Alm Jahran	Fir	nal Seniority List	of Junior Secretar	les (DDC cc)	
	No Name	. Father Name	Oato of Black	Appointment Date	ies (Rb2-03)	
<u> </u>	75 Muhammad Ibrahim	, Tilowat Khan	05/04/1991		Current Post	Remarks
<u> </u>	76 Muhammad Saqib Khan	Rahgem Khan	15/04/1991			Appointed as Secretary (BPS-7) on 23.02.2015
<u> </u>	77 Mohsin Khan		01/08/1991			IMPROBLED BY SAMPLED AND THE AND
-	8 Syed Amjid Ali Shah	Syed Jamal Shah	15/08/1991	23/02/2016	T	PPUBLICA AS Secretary (BDC-2) as an assault
_	9 Yaseen Ahmad	Noor Muhammad		23/02/2016		PPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPPP
	O Shahid Hussain	Shah Baz Khan	12/12/1991	23/02/2016	[C2/02/2010	PPPOINTED as Secretary (ADS. 7) on 22 Anna Acc
<u> </u>	True transition Affilia (Muhammad Yaseen	, 01/01/1992		- F0105 T4 4010	APPOINTED as Secretary/ROCETY was forward as a
87	2 Muhammad Abbas	Zahld Gut	03/01/1992	23/07/2016		A DDOINTED AS SEMPLAND (ADELY) ASSAURANCE AND ASSAURANCE
8:		Muhammad ibrahim	10/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7) dn23.02-2016
84		Akmal Khan	12/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7) on 23.02.2016
89		Sehat Shah	17/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02,2016
86			16/02/1992	23/02/2016	23/02/2016	Approlated 23 Secretary (6/5-7) on 23,02,2016
87		Sheryar	07/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016
88		Fazil Nagem	10/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (825-7) on 23.02.2016
89		Bashir Ahmad Khan	15/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 25.02.2016
90		imtiaz Khan	17/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7) on 23.02.2016
91		Fazla Malik	18/03/1992	23/02/2016		Appended as Secretary (BDC 1) and as an an area
92		Rahim Gui	23/03/1992	23/02/2016	23/02/2016	ppointed as Secretary (BPS-7) on 23:02.2016
93	Muhammad Zaib	Abdul Qadir	25/03/1992	23/02/2016		PPGINED BY Secretary (ADS 7) 22 04 200 5
94	Imran Khan	Falt Muhammad	08/04/1992	23/02/2016		DDOINED at Secretary (ppc. 7) as an as as as
95		Hussain Muhammad	10/04/1992	23/02/2016		PPGUMED AS Securitary (DDC 2) and as a said
	Hazret Umar Anwar Ali	Khan Bahadar	11/04/1992	23/02/2016		Province as Secretary (RPC7) on 12 or 1016
97		Sabz All	15/04/1992	23/02/2016		PPOINTED as Secretary (RDC-21 on 22 or 2000
98	Waqas Khan	Riaz Khan	21/04/1992		73/02/1010 M	ppointed as Secretary (RPC-7) on 32 of 2015
	Syed Feroz Shah	Syed Jamal Shah	25/04/1992		TOTOLAS	PPOUNTED as Serretary (ADC-1) on 12 of sacc
	Amin Ul Haq	Mumtaz Khan	30/05/1992			Pointed as Secretary (ADC 1) saids about
	Habib Ullah	Kifayat Ulfah	05/08/1992			Pointed as Secretary (RDS-7) on 12 of 2005
	Bilal Khan	Alam Zeb Khan				POINTED AS Secretary Japa. 71 agrees as as a second
102	Musawir Khan	Wazir Gul	15/01/1993		TOTO CO TOTO WE	POINTED AS Secretary (ADS 7) 32 on a dec
	Salman Ullah	Pir Muhammad	03/03/1993	7-7-7-0	TAIDEN TOTOLNO	DOINTED AS Secretary (BDC.7) 37 on ages
104	Haidar Sher	Umar Sher	13/03/1993			Punica as Secretary (RDC 7) 33 co social 1
105	Abdullah Shah	Muhammad Shah	15/03/1993		TOTALND	POINTED BY Secretary (RDC 3) and an age of 11
106	Ibad Ullah	Darwish Khao	20/03/1993			POINTED BE SPORTING (BOS 3) on 32 on 204
107	Gul Wahab	Muhammad Yar	06/04/1993	23/02/2016	23/02/2016 AD	pointed as Secretary (BPS-7) on 23.02:2016
108	Abdul Haseeb	Harrat Umar	04/05/1993		-DIOLI ZOTOIAD	pointed as Secretary / DDS 1)
109	Muhammad Islam	Anwar Zeb	04/05/1993		23/02/2016 Apr	pointed as Secretary (BPS-7) on 23.02.2016
110		Bakht Taj	05/05/1993	23/02/2016 -	3/02/2015 AB	Sointed as Secretary (BPS-7) on 23.02.2016
111	Shahan Khan Nagi		05/09/1993	23/02/2016 2	3/02/2016 Apr	pointed as Scoretary (BPS-7) on 23.02.2016
		Мићатта Маді	08/04/1994		2/02/2015	pointed as Secretary (BPS-7) on 23.02.2016 pointed as Secretary (BPS-7) on 23.02.2016

Local Govt and RDD Mardan

T=-		Final S	eniority Ust o	of Junior Secretari	es (BPS-09)	
_	lo [fame	Father Name -	Onte of Birth	Appointment Oate .	Current Post	Rémarks
11		Lai Mir	20/04/1994	23/02/2016	23/02/2016	Appointed as Secretary (8PS-?) on 23.02.2016
11		Namoos Khan	01/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016
11		Jafar Khan	02/05/1994		23/07/2016	Explainted As Secretary (BYS-7) on 13.07.2016
11		Khalid Khan	10/05/1994			Appointed as Secretary (8)5-7) on 23,02-2016
1110		Sher Zada	04/08/1994	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016
11		Saleh Badshah	15/08/1994	23/02/2016		Appointed as Selectify (BPS-7] on 20022016
110		Muhammad Irshad	20/10/1994	23/02/2016		Appointed as Secretary (BPS-7) on 23.02 2016
119	Hässen Nasir	Sabir Ali	02/02/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS7) of 23.02:2016
120	Akbar Ali	Abdul Samad	02/02/1995		. 23/02/2016	Appointed as Secretary (BPS-7) on Q302/2016
121	Fawad Ahmed	Niaz Muhammad	16/03/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016
122	Noman Sadin	Noor Badshah	01/04/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02-2016
	Basil Ali	Muhammad Ali	29/04/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-2) pro 3 mg 2016
124	Sajjad Ali	Syed Hussain	15/01/1996	23/02/2016	23/02/2016	Spipointed as Secretary (BPS-7) on 27 07:2016
	Muhammad Wagas	Sheith Muhammad Yousaf		23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) ph.23 (D.20) 6
	Wajid Ali	Ali Haider	20/02/1996	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016
	Zakir Khan Bacha	Muhammad Umar Khan	13/02/1987	02/05/2016	02/05/2016[/	Appointed as Secretary (BPS-7) on 02.05.2016
	Muhammad Anas	Mukhtiar Hussain		20/05/2016	20/05/2016(/	Appointed as Secretary (895-7) on 2005 2016
129	Khaista Rahman	Mulitan	04/02/1991	20/05/2016	20/05/2016/	appointed as Secretary (BPS-7) on 2005 2016
	Muhammad Ali	Tel Wall Shah	07/03/1991	20/05/2016	20/05/2016	appointed as Secretary (8PS-7) on 2005 2016
	Shawkat Ali	Shah Pasand Khan	31/03/1991	20/05/2016	20/05/2016	ppointed as Secretary (8PS-7) on 2005/2016
	Fida Muhammad Khan	Saljad Ali	13/04/1991	20/05/2016	20/05/2016 A	ppointed as Secretary (BPS-7) on 20,09 20,16
133		Akmal Khan	22/01/1992	20/05/2016	20/05/2016 A	oppointed as Secretary (BPS-7) on 20.05.2016
134	Muhammad Ubaid	Muhammad Alsar	01/02/1992	20/05/2016	_20/05/2016 A	ppointed as Secretary (BPS-7) on 20.05/2016
	Jamil Khan	Muhammad Khan	01/04/1993	20/05/2016	20/05/2016 A	ppointed as Secretary (BPS-7) on 20.6/2016
	Llagat Shah	Sarfaraz Khan	10/02/1994	20/05/2016	20/05/2016/A	ppointed as Secretary (BPS-7) on 2005.2016
	Noman Jamet		06/11/1994	20/05/2016	20/05/2016 A	ppointed as Secretary (BPS-7) on/20.05, 2016
	Zia Ui Haq Adii	Jamai Abdul Nasir	01/08/1995	20/05/2016	20/05/2016 A	ppointed as Secretary (8PS-7) of 20.05.2016
139		Amin UI Haq	30/03/1991	23/05/2016	23/05/2016 A	ppointed as Secretary (BPS-7) on 23.05.2016
	Asad Ali	Anwar Ul Haq	23/05/1993	15/09/2017	15/09/2017 A	ppointed as Secretary (BPS-7) on 15.09.2017
	Jehangir Shah	Feroz Shah	17/01/1990	25/09/2017	25/09/2017 A	ppointed as Secretary (BPS-7) on 25,09,2017
	Teimoor Ali Shah	Maroof Shah	.05/01/1989	23/02/2018	23/02/2018[Ai	opolinied as Secretary (RPS-9) on 37 ft 2049
142	1 BERCOT ALI SITATI	Inayat Ali Shah	02/05/1998	30/11/2018	30/11/2018 A	ppointed as Secretary (BPS-9) on 30.11.2018
143	References				Pr	omoted to Secretary (8PS-9) on 30.04.2019
<u> </u>	Mohib Ullah	Hamish Gut	15/03/1971	02/06/1990	30/04/2019 At	pointed as Naib Qasid (BPS-1) on 02.06.1990
144					Pe	omoted to Secretary (BPS-9) on 30,04,701,9
	Arshad Hussain	Fagir Itessain	03/04/1974	25/07/1993	30/04/2019 Ac	pointed as Naib Qasid (BPS-1) on 25.07.1993
		· -				(br.F.1) on 25.07,1993

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Local Govt-and RDD Mardan

		Final Se		ity List of Junior Secretaries (BPS:09)					
5.Hc	Name	Father Name	Date of Birth	Appointment Date	Current Post	Remarks			
145	Oil Raj Khan	Shamshad Khan	12/04/1973	16/03/1994		Promoted to Secretary (BPS-9) on 30.04.1019 Adjusted as train Casid (BPS-1) on 12.12.2001 Appointed as Chowkidar (Temp) on 16.01.1994			
145	Zakir Muhammad	Jamshid Muhammad	27/02/1969	18/05/1994		Promoted to Secretary (BPS-9) on 30.04.1019 Appointed as Chowkida (BPS-1) on 18.05.1994			
147	Muhammad Salim	Muhammad Rahim	12/07/1971	01/01/1995		Promoted to Secretary (BRS-9) on 30.04.2019 Adjusted as Nath Clased (BPS-1) on 14.05.2003 Appointed as Lab Atlendent (Temp) on 01.01.199			
148	Muhammad Zaman	Muhammad Aslam	04/02/1983	20/10/2005		Promoted to Secretary (BPS II) on 30.042019 Appointed as Naib Oasid (BPS II) on 20.10/2005			
149	Bashir Muhammad	Dilawar Khan	20/04/1977	22/04/2013		Promoted to Secretary (8PS-9) on 30.062019 Appointed as Naib Oasid (8PS-1) on 22.04.2013			
150	Umar Farooq	Soif Ur Rehman	11/02/1992	22/04/2013	30/04/2019	Promoted to Secretary (BPSP) on 30.062019 Appointed as Naïb Oasid (BPS-1) on 22.04.2013			
151	Muhammad Musiala	Miraj Muhammad	02/10/1977	03/04/2015	30/04/2019	Promoted to Secretary (BPS-3) on 30.04.2019 Appointed as Naib Qasid (BPS-3) on 03.04.2015			
152	Sami Ullah	Aman Ullah Khan	11/05/1979	03/04/2015	30/04/2019	Promoted to Secretary (BPS-3) on 03.04.2015 Appointed as Naib Casid (BPS-3) on 03.04.2015			
	Farhad Ali	Raham Sala Khan	03/02/1985	05/07/2019		Appointed as Secretary (BPS-9) on 05.07,2019			
	Intishan	Noor III Haq	20/08/1987	05/07/2019		Appointed as Secretary (BPS-9) on 05.07,2019			
	Jan Muhammad	Shams UI Qamar	15/01/1989	05/07/2019		Appointed as Secretary (BPS-9) on 05.07.2019			
$\overline{}$	Muhammad Imran	Muhammad Parvez	03/03/1990	05/07/2019		Appointed as Secretary (BPS-9) on 05.07,2019			
	Sejad	Aman Utlah Khan	05/03/1992	05/07/2019		Appointed as Secretary (BPS-9) on 05.07.2019			
	Sibghat Ullah Abdul Naeem Khan	Jala Ud Din	09/03/1992	05/07/2019	05/07/2019	Appointed as Secretary (BPS-9) on OS.07.2038			
	Numan	Abdul Qayum Khan	03/04/1993	05/07/2019	05/07/2019	Appointed as Secretary (BPS-9) on 05.07.2019			
$\overline{}$	Kashan Ali	Ghulan Rasool	25/04/1993	05/07/2019	05/07/2019	oppointed as Secretary (BPS-9) on 05.07.2019			
	Wisal Muhammad .	Etrsan Ali Gul Nabi	01/09/1993	05/07/2019	05/07/2019 /	ppointed as Secretary (BPS-9) on 05.07.3919			
	Farhad Ali	Murad Ali	05/03/1994	05/07/2019		Appainted as Secretary (BPS-9) on 05.07.2019			
_	Urnair Khan	Siraj Ur Rehman	06/02/1995	05/07/2019		oppointed as Secretary (BPS-9) on QS.07.2019			
	Muhammad Talmoor Khan	Gul Bahadar		05/07/2019		Appointed as Secretary (BPS-9) on QS.07.2019			
	Muhammad Abbas Khan	Zulfiger All	17/06/1999 02/02/2000	05/07/2019	72/07/2019	oppointed as Secretary (BPS-97on 05.07.2019			
	Sadam Hussain	Rahlm Gul	25/04/1996	22/07/2019 26/07/2019		Appointed as Secretary (BPS-9) on 22.07.2019			
	Zahoor Khan	Hukam Khan	02/03/1995	15/04/2020	15/04/2019	appointed as Secretary (BPS-9) on 26.07.2019			
	Zeeshan Ahrmad	Zahir Shafr	10/09/1992	18/05/2020		ppointed as Secretary (8PS-9) on 15.04.2020			
	Abdul Majid	Moeen Ud Din	24/03/1995	18/05/2020		ppointed as Secretary (BPS-9) on 18:03:2020 Appointed as Secretary (BPS-9) on 18:05:2020			

Local Govt and RDD Mardan

PINO	Name	father Name	al Seniority List o	addition secretari	1 <u>P5 (BP3-U9)</u>	
171		7	Date of Birth	Appointment Date	Current Post	
172	Adnan Khan	Fazii Rehman	29/03/1993	12/12/2017		Promoted to Secretary: [BISS] on 05.06.2020 Appointed at Nab Qasid [BISS] on 12.12.2017
	Shehryar Khan	Nihar (Wuhammad	18/04/1992	19/12/2017	F	IF WITHOUGH TO Secretary 1995 Of the Actions
	lffikhar	Shamshad Khan	05/02/1979	21/12/2017		Appointed as Nath Gas (a) 1975 3) wh 19 10 2017 Promoted to Secretary (8859) on 05 (6 2020
1	lbad Ullah	Abid Ullah	04/04/1997	21/12/2017	2	Appointed as Nath Das (d)(0,53) on 21 12 2012 Promoted to Secretary (482-9) on 0506 2020:
,	Muhammad Tufail	Ghani Rafiman	07/05/1998	22/12/2017		Appointed as Naib 033 id (895-3) on 21 11 2017 Promoted to Secretary (885-9) on 05 852020
	Vaseem Ullah	Fazal Wahab	06/10/1992	26/12/2017	- 10	Appointed as Nail Dasid (BPS 3) 07 22 12 2017 Promoted to Secretary (BPS 9) 00 05 06 2020
- 1	fuhammad liyas	Muhammad Iqbal	01/04/1996	26/12/2017		Appointed as Naib Oastd (885-3) on 25 (2.2017 Promoted to Secretary (885-3) on 0506 (020
1	lushtaq Ahmad	Muhammad Aziz	01/04/1994	01/01/2018	ir.	Appointed as Nalb Dasid (8853) on 26.12.2107 Compted to Secretary (8854) on 05.05.7020
,	mras Khan	Hazrat Hassan	02/02/1977		10	Appointed as Nalb Oasid (BPS-3) on 03:01:2018 Promoted to Secretary (BPS-9) on 05:06:2020
7	Dad Ali	Muhammad Gul	01/01/1983		Pi	romoted to Secretary (RBS 0) - 28 02 2018
5h	oaib Khan	Shah Pasand Khan	07/03/1986		Pr	romoted to Secretary (BDS-8) on 28.02.2018
Ma	ensoer Khan	Amir Zada	11/11/1993	1	Pr.	ppointed as Naib Casid (BPS-3) on 28 11/2018
Aya	az Ur Rehman	Fayaz Ur Rehman	28/02/1999	28/02/2018	OSTOR ED SOLAD	PPOINTED as Nath Oath (BBC at an additional)
Pir	Hamza Sohail	Muhammad Sohaji	24/03/2002		201 COL TO EGILLI	omoted to Secretary (BPS-9) on 05:06:2020 appointed as Secretary (BPS-9) on 05:06:2020

Local Govt & RDO Mardan

SEMBITAR DE



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

Dated MRD/Estab/: 8/10/2021

OFFICE ORDER:

No./AD/LG&RDD/MRD/ESTAB/Promotion/2021: ³⁷ Consequent upon the recommendation of Departmental Selection/recruitment Committee meeting held on 30-09-2021, 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:

NuN	lame		Father Name	Date	of Birth		tment	Rema	rks 		
		1		Ì	. 1	ate					
-	lamal	Ahmad	Riaz Ahmad	13/	/04/1990	24	12/2011	1	ied from BPS-0		1
1	Muh: Shah	ammad Farooq	Muhammad Zahi Shah	20	/11/1976	23	/02/2016		oted from BPS-0	•	
	Ash	faq	Nadar Khan	10	1/06/1981	23	/02/2016	ļ	oted from BPS-		_
<u> </u>	Fero	az Shah	Syed Zahir Shah	0:	2/04/1985	2.	3/02/2016	ι .	oled from BPS-		الا
5	Nia	z Muhammad	Muhim Muhammad	0'	9/11/1985	2	3/02/2016	1	noted from BPS	1	Å
6	lhs	an Ullah	Nadar Khan	- -	5/01/1986		3/02/2016	i	noted from BPS		- 1
7	Ku	imail Hamza	Adam Khan	_	17/02/1986	1	23/02/2016	- }	moted from BPS		
8	AI	pid Ali	Gul Zada		20/03/1986	ļ	23/02/2016	Į.	moted from BP		- 1
9	Н	abib Ullah	Niuz Nabi		15/04/1986		23/02/2016	- 1		-	
1	0 S	yed Waqas Ali Sh	ah Syed Ghafar S	halı	30/04/1980		23/02/2016		omoted from BF		
-	F	aiz Ul Islam	Faiz Ur Rahm	an	19/09/198	6	23/02/2016		amoted from Bl		
-	2 J	anas Khan	Khan Sher		01/01/198	7	23/02/2016				
+	13 1	smail	Alunad		02/02/191	37	23/02/2016		romated from F		
-	14	Muhammad Youn	as Said Zahir Si	ıah	06/02/19	87	23/02/201	· {	romoted from I		
<u> </u> _	1	Asad Ali	Ali Rahman		11/02/19	87	23/02/201	- 1	Promoted from		
-	16	Taimur Khan	Abdul Sattar		01/03/19	87	23/02/201		Promoted from		
+	17	Yasir Khan	Sher Zamin		02/03/19	987	23/02/20	16	Promoted from	•	
+		Sajjod Khan	Abdur Rahr	ກຸໝາ	20/04/1	987	23/02/20	16	Promoted from		
.	19	Khalid Khan	Nowsher K	han	12/07/1	987	23/02/20	016	Promoted from		
 	20	Umar Hayat	Nadir Khai	<u> </u>	31/10/	987	23/02/2	016	L	n 805-09 to E	_
ļ	21	Shafi Ullah	Atta Ullah		20/12/	987	23/02/2	016	1	n BP\$-0940 B	
. !			Alam Zeb		25/12/1987		7 23/02/2016		Promoted fro	n BPS-09 to B	JPS -

Ajmal Khan Shah Fahad Auhammad Shafiq	Umar Khan Gul Rehman Mir Zaman	02/01/1988	23/02/2016	Promoted from BPS-09 to BPS-11 Promoted from BPS-09 to BPS-11
Auhanunad Shafiq			23/02/2016	Promoted from BPS-09 to BPS-11
	Mir Zaman	1002/1000		
	E t	10/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
iaz Ali Shah	Qadcem Shah	18/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
altoor Muhammad	Fazal Muhammad	31/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
adiq Ur Rehman	Raj Muhammad	01/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
lussain Muhammad Shad	Zahir Shah	06/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
ajid Ali Jan	Allah Bakhsh	12/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
di Shah	Magsood Gul	05/01/1989	23/02/2016	Promoted from BPS-09 to BPS-11
11	ussain Muhammad shad	ussain Muhammad Zahir Shah shad ajid Ali Jan Allah Bakhsh	ussain Muhammad	diq Ur Rehman Raj Muhammad 01/04/1988 23/02/2016 ussain Muhammad Zahir Shah 06/04/1988 23/02/2016 shad ujid Ali Jan Allah Bakhsh 12/04/1988 23/02/2016

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.

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.
- 6. 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

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			Local Gov	vt and RDD Marda	3 m	
	······	• Seni	ority List of .	Junior Secretaries	(BPS-09)	# Condustration
S.No	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks
(1)	Imtiaz Ali	Azīz Ullah	1/10/1989	2/23/2016		Appointed as Secretary (8PS-7) on 23.02.2016
ž	Sabir Khan	Momin Khan	1/13/1989	2/23/2016	BA '	Appointed as Secretary (BPS-7) on 23.02.2016
3	Muhammad Salman	Hussain Khan	1/24/1989	2/23/2016	MA-Islamiat	Appointed as Secretary (BPS-7) on 23.02.2016
4	Liagat Ali	Deedan Gul	2/13/1989	2/23/2016	MCS	Appointed as Secretary (8PS-7) on 23.02.2016
5	Muhammad Saljiad	Amir Wahab	3/3/1989	2/23/2016	B.Tech	Appointed as Secretary (BPS-7) on 23.02.2016
,6	Tahir Rahman	Ghafoor Rahman	3/5/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
7	Numan Khan	Fazal Mir	3/25/1989	2/23/2016	MBA	Appointed as Secretary (BPS-7) on 23.02.2016
В	Muhammad Arif	Muhammad Ghawas	3/27/1989	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
٠9	Aman Khan	Waheed Ullah	4/6/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23,02,2016
7.7	A 1980年 新教育 1880年 - 1	10年前後後期 2	4/10/1989	1 3 222000	n care	Appointed as Secretary (BPS-7) on 23 02 2016
10	Nalk Wall	Sher Wall Khan	4/10/1989	2/23/2016	D.aC	Leave without Pay since 03.11.2021.(6.Months)
11	Imran Khan	Alam Zeb	4/12/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
12	Ubaid Ur Rahman	Saif Ur Rahman	4/15/1989	2/23/2016	M.Sc .	Appointed as Secretary (BPS-7) on 23.02.2016
13	Asif Khushal	Khushal Khan	4/22/1989	2/23/2016	BA	Appointed as Secretary (BPS-7) on 23.02.2016
14	Waseem Shah	Nadar Shah	4/25/1989	2/23/2016	M.Com	Appointed as Secretary (BPS-7) on 23.02.2016
15	Muhammad Imran	Sald Ahmad Jan	12/12/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
16	Riaz Ali	Muhammad Tahlir	1/6/1990	2/23/2016	ВА	Appointed as Secretary (BPS-7) on 23,02,2016
17	Sajid Khan	Syed Zaman	2/5/1990	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016
18	Tahir Hussain	Akbar Hussain	2/11/1990	2/23/2016	BBA	Appointed as Secretary (BPS-7) on 23.02.2016
19	Gui Taj	Zahlr Taj	3/1/1990	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016
20	Muhammad Asad Zia	Farman	3/5/1990	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016
21	lhsan Uddin	Burhan Ud Oin	3/15/1990	2/23/2016	M.Com	Appointed as Secretary (BPS-7) on 23.02.2016
22	Hamad Ali	Niaz Ali	3/20/1990	2/23/2016	M.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
23	Sajjad Afzal	Afzal Khan	4/1/1990			Appointed as Secretary (BPS-7) on 23.02.2016
24	Farhed All	Llagat Ali	4/3/1990	2/23/2016	BA	Appointed as Secretary (BPS-7) on 23.02.2016
25	Muhammad Asghar Khan	Gul Rosh	4/12/1990	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
	Tariq Shah	Syed Wall Shah	6/22/1990			Appointed as Secretary (BPS-7) on 23.02.2016
_	Irlan Khan	Fazli Qadar	8/28/1990	2/23/2016	ABM	Appointed as Secretary (BPS-7) on 23.02,2016
	Syed Bilawal Hussaln	Syed Bashir Hussaln	9/25/1990			Appointed as Secretary (BPS-7) on 23.02.2016
_	Ali Raza	Nisar Muhammad	12/15/1990			Appointed as Secretary (BPS-7) on 23.02.2016
30	Jafar Khan	Gul Rehman	1/7/1991			Appointed as Secretary (8PS-7) on 23.02.2016
31	Nasir Khan	Mehraban Shah	1/21/1991			Appointed as Secretary (BPS-7) on 23.02.2016
32	Junaid Ur Rehman	Kifayat Ullah	2/1/1991	2/23/2016	ssc	Appointed as Secretary (BPS-7) on 23.02,2016
	Zahid Hussain	Gul Zada	2/9/1991	2/23/2016	MA	Appointed as Secretary (RPS-7) on 23.02.2016

	Local Govt and RDD Mardan									
		Sen	iority List of	lunior Secretaries	(BPS-09)	_				
	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks				
34	Muhammad Arif	Mir Alam	2/12/1991	2/23/2016	MCS	Appointed as Secretary (BPS-7) on 23.02.2016				
35	Abrar Ahmad	Pazir Gul	2/12/1991	2/23/2016	F.Sc	Appointed as Secretary (8PS-7) on 23.02.2016				
36	Salman Akhtar	Amir Ud Din	3/16/1991	2/23/2016	M.Sc	Appointed as Secretary (8PS-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				
$\overline{}$	Arshad Ali	Jan Syed	3/17/1991	2/23/2016	МА	Appointed as Secretary (BPS-7) on 23.02.2016				
39	Inayat Ur Rahman	Bakht Zada	3/30/1991	2/23/2016	MA	Appointed as Secretary (8PS-7) on 23.02,2016				
40	Muhammad Asif	Ghulam Hussain	3/31/1991	2/23/2016	HSSC	Appointed as Secretary (BPS-7) on 23.02.2016				
	Atta Ur Rahman	Meher Gul	4/3/1991	2/23/2016	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				
	Hemair 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	M.Com	Appointed as Secretary (BPS-7) on 23.02.2016				
45.	Muhammad Saqib Khan	Raheem Khan	4/15/1591	2/23/2016	BCS ·	Appointed as Secretary (BPS-7) on 23.02.2016				
46	Mohsin Khan	Hassan Khan	8/1/1991	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016				
47	Syed Amjld Ali Shah	Syed Jamai Shah	8/15/1991	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23,02,2016				
48	Yaseen Ahmad	Noor Muhammad	12/12/1991	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016				
49	Shahid Hussain	Shahbaz Khan	1/1/1992	2/23/2016	M.Com	Appointed as Secretary (BPS-7) on 23.02.2016				
50	Muhammad Junaid	Muhammad Yaseen	1/3/1992	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016				
51	Muhammad Abbas	Zahid Gul	1/10/1992	2/23/2016	B.Com	Appointed as Secretary (BPS-7) on 23.02.2016				
	Muhammad Yaqub	Muhammad Ibrahim	1/12/1992	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016				
53	Bilal Khan	Akmal Khan	1/17/1992	2/23/2016	BA	Appointed as Secretary (BPS-7) on 23.02.2016				
54	Asif Ali Shah	Sehat Shah	2/16/1992	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23,02,2016				
55	Waqas Khan	Sheryar ·	3/7/1992	2/23/2016	B.Com	Appointed as Secretary (BPS-7) on 23.02.2016				
56	lmad Naeem	Fazii Naeem	3/10/1992	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016				
57	Adil Khan	Bashir Ahmad Khan	3/15/1992	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016				
58	Fawad Ali	Imtiaz Khan	3/17/1992	2/23/2016	BA	Appointed as Secretary (BPS-7) on 23.02.2016				
59	Mubassar Shah	fazle Malik	3/18/1992	2/23/2016	BBA	Appointed as Secretary (BPS-7) on 23.02.2016				
60	Muhammad Zeb	Rahim Gul	3/23/1992	2/23/2016	B.Tech	Appointed as Secretary (BPS-7) on 23.02.2016				
61	Muhammad Adil	Abdul Qadir	3/25/1992	2/23/2016	F.Sc	Appointed as Secretary (BPS-7) on 23.02.2016				
62	Muhammad Zaib	Falz Muhammad	4/8/1992	2/23/2016	BBA	Appointed as Secretary (BPS-7) on 23.02,2016				
	Imran Khan	Hussain Muhammad	. 4/10/1992	2/23/2016	M.Sc	Appointed as Secretary (BPS-7) on 23.02.2016				
64	Hazrat Umar	Khan Bahadar	4/11/1992	2/23/2016	MA-IR	Appointed as Secretary (BPS-7) on 23.02.2016				
65	Anwar All	Sabz Ali	4/15/1992	2/23/2016	BA.	Appointed as Secretary (BPS-7) on 23.02.2016				
	Waqas Khan	Riaz Khan	4/21/1992	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016				
67	Syed Feroz Shah	Syed Jamai Shah	4/25/1992	2/23/2016	_	Appointed as Secretary (BPS-7) on 23.02.2016				

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	Local Govt and RDD Mardan								
	- · · · · · · · · · · · · · · · · · · ·	Senio	ority List of	unior Secretaries	(BPS-09)	o Condugate			
S.No	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks			
68	Amin VI Haq	Mumtaz Khan	5/30/1992	2/23/2016	FA	Appointed as Secretary (BPS-7) on 23.02.2016			
69	Habib Ullah	Kifayat Ullah	8/5/1992		MA-Islamiat	Appointed as Secretary (BPS-7) on 23.02.2016			
70	Bilal Khan	Alam Zeb Khan	1/15/1993	2/23/2016	BA '	Appointed as Secretary (BPS-7) on 23.02.2016			
71	Musawir Khan	Wazir Gul	3/3/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
72	Salman Ullah	Pir Muhammad	3/13/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
73	Haider Sher	Umar Sher	3/15/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
74	Abdullah Shah	Muhammad Shah	3/20/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
75	(bad Ullah	Darwish Khan	4/6/1993	2/23/2016		Appointed as Secretary (8PS-7) on 23.02.2016			
76	Gul Wahab	Muhammad Yar	5/4/1993	2/23/2016		Appointed as Secretary (8PS-7) on 23.02.2016 ···			
77	Abdul Haseeb	Hazrat Umar	5/4/1993	2/23/2016		Appointed as Secretary (8PS-7) on 23.02.2016			
78	Muhammad Islam	Anwar Zeb	5/5/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
79	Mubassir Klian	Bakht Taj	9/5/1993	2/23/2016	SSC .	Appointed as Secretary (BPS-7) on 23.02.2016			
80	Shahan Khan Nagi	Muhammad Naqi	4/8/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
81	Muhammad Zeeshan	Lal Mir	4/20/1994	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016			
		Sved Ahmad Hussain Shah	4/30/1994	3 5 5 7/23/2016	40	Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016 Leave without Pay, since 22.11.2019 Leave without Pay extended on 24.06.2020 (2-Years) Appointed as Secretary (BPS-7) on 23.02.2016			
黑	Syed Sail Ullah	Syeo Arimao russani Shan	3.4		2000	Leave without Pay extended on 24.06.2020 (2-Years)			
83	Muhammad Sahib	Namoos Khan	5/1/1994	2/ 20/ 2010	. I				
84	Neseer Khan	Jafar Khan	5/2/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
85	irfan Ullah	Khafid Khan	5/10/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
86	Sami Uliah	Sher Zada	8/4/1994		DAE-Electrical	Appointed as Secretary (8PS-7) on 23.02.2016			
87	Farooq Badshah	Saleh Badshah	8/15/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
88	Ishfaq Ali	Muhammad Irshad	10/20/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23,02,2016			
89	Hassan Nasir	Sabir Ali	2/2/1995	2/23/2016	-	Appointed as Secretary (BPS-7) on 23.02.2016			
90	Akbar Ali	Abdul Samad	2/2/1995	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016			
91	Fawad Ahmad	Nlaz Muhammad	3/16/1995			Appointed as Secretary (BPS-7) on 23.02.2016			
. 92	Noman Sadiq	Noor Badshah	4/1/1995		DAE-CIVII	Appointed as Secretary (BPS-7) on 23.02.2016			
93	Basit Ali	Muhammad Ali	4/29/1995			Appointed as Secretary (BPS-7) on 23.02.2016			
94	Sajjad Ali	Syed Hussain	1/15/1998			Appointed as Secretary (BPS-7) on 23.02.2016			
95	Muhammad Waqas	Sheikh Muhammad Yousaf	2/20/1996		+	Appointed as Secretary (BPS-7) on 23.02.2016			
96	Wajid Ali	Ali Halder .	2/10/1987			Appointed as Secretary (BPS-7) on 02.05.2016			
97	Zakir Khan Bacha	Muhammad Umar Khan	2/13/1990	5/20/2016		Appointed as Secretary (BPS-7) on 20.05.2016			
98	Muhammad Anas	Mukhtiar Hussain	2/4/1991		MBA-Finance	Appointed as Secretary (BPS-7) on 20.05.2016			
.99	Khaista Rahman	Multan	3/2/1991	5/20/2016	MA-Urdu	Appointed as Secretary (BPS-7) on 20.05.2016			

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	_	S	eniority List of J	unior Secretaries	(BPS-09)	
5.No	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks
	Muhammad Ali	Taj Wali Shah	3/31/1991	5/20/2016		Appointed as Secretary (BPS-7) on 20.05.2016
	Shawkat Ali	Shah Pasand Khan	4/13/1991	5/20/2016	MA	Appointed as Secretary (BPS-7) on 20.05.2016
	Fida Muhammad Khan	Sajjad Ali	1/22/1992	5/20/2016	8.Sc	Appeinted as Secretary (BPS-7) on 20.05.2016
	Shah Faisal	Akmal Khan	2/1/1992	5/20/2016	BBA.	Appointed as Secretary (8PS-7) on 20.05.2016
	Jamil Khan	Muhammad Khan	2/10/1994	5/20/2016	MA-Islamiat	Appointed as Secretary (BPS-7) on 20.05,2016
	Liagat Shah	Sarfarez Khan	11/6/1994	5/20/2016	BS-Physics	Appointed as Secretary (BPS-7) on 20.05.2016
	Noman Jamai	Jamal Abdul Nasir	8/1/1995	S/20/2016	DAE-Electrical	Appointed as Secretary (BPS-7) on 20.05.2016
	Zia Ul Haq Adil	Amin Ul Haq	3/30/1991	5/23/2016	DAE-Electrical	Appointed as Secretary (BPS-7) on 23.05.2016
	Tagweem Ul Hag	Anwar Ul Haq	5/23/1993	9/15/2017		Appointed as Secretary (BPS-7) on 15.09.2017
	Asad Ali	Feroz Shah	1/17/1990	9/25/2017		Appointed as Secretary (BPS-7) on 25.09.2017
		Maroof Shah	1/5/1989	2/23/2018		Appointed as Secretary (BPS-9) on 23.02.2018
	Jehangir Shah	Inayat Ali Shah	5/2/1998	11/30/2018		Appointed as Secretary (BPS-9) on 30.11.2018
111	Taimoor Ali Shah	itidyat Ari Silali		<u> </u>		Promoted to Secretary (BPS-9) on 30.04.2019
112	Mohib Ullah	Hamish Gul	3/15/1971	6/2/ 19 90 F	FA	Appointed as Naib Casid (BPS-1) on 02.06.1990
		Faqir Hussain		7/25/1993	SSC	Promoted to Secretary (BPS-9) on 30.04.2019
113	Arshad Hussain		4/3/1974			Appointed as Naib Qasid (BPS-1) on 25.07.1993
	·				<u> </u>	Promoted to Secretary (BPS-9) on 30,04,2019
		Shamshad Khan	4/12/1973	1	B.A	Adjusted as Naib Qasid (BPS-1) on 12.12.2001
114	Dil Raj Khan		4/12/23/3			Appointed as Chowkidar (Temp) on 16.03.1994
						Promoted to Secretary (BPS-9) on 30.04.2019
115	Żakir Muhammad	Jamshid Muhammad	2/27/1969	5/18/1994	SSC	Appointed as Chowkidar (BPS-1) on 18.05.1994
				<u></u>	ļ	Promoted to Secretary (BPS-9) on 30.04.2019
 -			7/17/2071	1/1/1995	Na	Adjusted as Naib Qasid (BPS-1) on 14.05,2003
116	Muhammad Salim	Muhammad Rahim	7/12/1971	1/1/1333	Pan	Appointed as Lab Attendent (Temp) on 01.01.1995
	<u> </u>			<u> </u>		Promoted to Secretary (BPS-9) on 30.04.2019
117	Muhammad Zaman	Muhammad Aslam	2/4/1983	10/20/2005	SSC	Appointed as Naib Qasid (BPS-1) on 20.10.2005
11/	With anymatic Zaman	Indiana / Sign		<u> </u>	<u> </u>	Promoted to Secretary (BPS-9) on 30.04.2019
		Dilawar Khan	4/20/1977	4/22/2013		Appointed as Naib Qasid (BPS-1) on 22.04.2013
118	Bashir Muhammad	Ullawat Kish			 	Promoted to Secretary (8PS-9) on 30.04.2019
		g Wille Daleman	2/11/1992	4/22/2013		Appointed as Naib Qasid (BPS-1) on 22.04.2013
119	Umar Faroog	Saif Ur Rehman	£1221100	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u></u>	Promoted to Secretary (BPS-9) on 30.04.2019
	Muhammad Mustafa	ustafa Miraj Muhammad	10/2/1977	7 4/3/2015		
120			10,2,157,		 	Appointed as Naib Qasid (BPS-3) on 03.04.2015
·			5/11/1979	4/3/2015		Promoted to Secretary (BPS-9) on 30.04.2019
121	121 Sami Ullah	Aman Ullah Khan	2/11/12/3	7/3/2013	i	Appointed as Naib Qasid (BPS-3) on 03.04,2015

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		Ser	iority List of	Iunior Secretaries	(BPS-09)	
S.No	Name	Father Name	Date of Birth		Qualification	Remarks
122	Farhad Ali	Raham Sala Khan	2/3/1985	7/5/2019	MA	Appointed as Secretary (BPS-9) on 05.07.2019
123	Ihtishám	Noor Ul Haq	8/20/1987	7/5/2019	8A	Appointed as Secretary (BPS-9) on 05.07.2019
124	Jan Muhammad	Shams Ul Qamar	1/15/1989			Appointed as Secretary (BPS-9) on 05.07.2019
125	Muhammad Imran	Muhammad Parvez	3/3/1990			Appointed as Secretary (BPS-9) on 05.07.2019
126	Sajad	Aman Ullah Khan	3/5/1992	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
127	Sibghat Ullah	Jalal Ud Din	3/9/1992	7/5/2019	MA	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	M.Com	Appointed as Secretary (BPS-9) on 05.07.2019
130	Kashan Ali	Ehsan Ali	9/1/1993			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 Ali	2/6/1995	7/5/2019	BS	Appointed as Secretary (BPS-9) on 05.07.2019
133	Umair Khan	Siraj Ur Rehman	4/7/1995		\$	Appointed as Secretary (BPS-9) on 05.07.2019
134	Muhammad Talmoor Khan	Gul Bahadar	6/17/1999		B\$-Software	Appointed as Secretary (BPS-9) on 05.07.2019
135	Muhammad Abbas Khan	Zulfigar Ali	2/2/2000			Appointed as Secretary (8PS-9) on 22:07.2019
136	Sadam Hussain	Rahim Gul	4/25/1996			Appointed as Secretary (BPS-9) on 26.07,2019
137	Zahoor Khan	Hukam Khan	3/2/1995			Appointed as Secretary (BPS-9) on 15.04.2020
138	Zeeshan Ahmad	Zahir Shah	9/10/1994	5/18/2020	M.Com	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
			3/29/1993	12/12/2017		Promoted to Secretary (BPS-9) on 05.06.2020
140	Adnan Khan	Fazli Rehman	3/29/1993	12/12/2017		Appointed as Naib Qasid (BPS-3) on 12.12.2017
			4/18/1992	12/19/2017	İέλ	Promoted to Secretary (BPS-9) on 05.06.2020
141	Shehryar Khan	Nihar Muhammad	4/18/1992	12/13/2017	Jun	Appointed as Naib Qasid (BPS-3) on 19.12.2017
			7. lr. la 0.70	12/21/2017	l _e ,	Promoted to Secretary (BPS-9) on 05,06,2020
142	iftikhar	Shamshad Khan	2/5/1979	12/21/2017		Appointed as Naib Qasid (BPS-3) on 21.12.2017
 			4/4/400	12/21/2017	1 C S =	Promoted to Secretary (BPS-9) on 05.06.2020
143	Ibad Ullah	Abid Ullah	4/4/1997	12/21/201/	F.3C	Appointed as Naib Qasid (BPS-3) on 21.12.2017
	<u> </u>		- 4-4	12/22/2017	Dar.	Promoted to Secretary (8PS-9) on 05.06.2020
144	Muhammad Tufail	Ghaoi Rahman	5/7/1998	12/22/2017	DAE	Appointed as Naib Qasid (BPS-3) on 22.12.2017
				40/00/00/		Promoted to Secretary (BPS-9) on 05:06.2020
145	Ayaz Ur Rehman	Fayaz Ur Rehman	2/28/1999	12/22/2017		Appointed as Naib Qasid (8PS-3) on 22.12.2017
-		Fazal Wahab	10/6/1992	12/26/2017	ssc	Promoted to Secretary (BPS-9) on 05.06.2020
146	Waseem Ullah					Appointed as Naib Qasid (BPS-3) on 26.12.2017
-				47.77.77.74	/Ic.c.	Promoted to Secretary (BPS-9) on 05.06.2020
147	Muhammad Ilyas	nad ilyas Muhammad Iqbal	4/1/1990	12/26/2017	F.3¢	Appointed as Naib Qasid (BPS-3) on 26.12.2107

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			Local Gov	rt and RDD Mard	an	
			Seniority List of	Tuhior Secretaries	(BPS-09)	
S.No	Name	Father Name	Date of Birth	Appointment Date	Qualification	Remarks
	Mushtaq 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 28.02.2018
150	Sajjad Ali	Muhammad Gul	1/1/1983	2/28/2018	F.Sc	Promoted to Secretary (BPS-9) on 05,06,2020 Appointed as Nalb Qasid (BPS-3) on 28.02,2018
151	Shoaib Khan	Shah Pasand Khan	3/7/1986	2/28/2018	SSC	Promoted to Secretary (BPS-9) on 05.06,2020 Appointed as Naib Qasid (BPS-3) on 28.02,2018
152	Mansoor Khan	Amir Zada	11/11/1993	2/28/2018		Promoted to Secretary (BPS-9) on 05.06.2020 Appointed as Naib Qasid (BPS-3) on 28.02.2018
153	Pir Hamza Sohail	Muhammad Sohail	3/24/2002	6/5/2020	HSSC	Appointed as Secretary (BPS-9) on 05.06.2020
	Muhammad Shoaib	Muzaffar Shah	3/18/1992	3/9/2021	BA	Appointed as Secretary (BPS-9) on 09.03.2021
	Sunny Mushtag	Mushtag Masih	7/24/1992	9/13/2021	D.Com	Appointed as Secretary (BPS-9) on 13.09.2020
	Sundaish Raj	Tilak Raj	5/17/1998		BS-Psycholgy	Appointed as Secretary (BPS-9) on 13.09.2020
	Ayub Masih	Younas Masih	3/15/2002		F.Sc-Medical	Appointed as Secretary (BPS-9) on 13.09.2020
	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

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১০১০ ১৯ ১৯ ১৯ বিশ্বর পর ১৯৯ বিশ্বরাজ্যের तः । त्यान्ताक क्षेत्रस्य क व्यक्तिक स्थानक विद्या विद्या ।

and are noted to be a second of the second o र १ : इक्राव्यक्त : १८ ल्लाक लोग्या, वर ११ : अह का ए **१ पहिल्ला सम्बद्ध स्वरामित्री हिन्दी**ई er an our amountagile on a really tour death are a surface to a second and the first first সমার কলভার ইন্যান্সলামীরীটিট্রিকর। राध्या । १,१५४ - र १५५ (५५) ३ में २० हैं। राज्य हैं राष्ट्रका अधिकारण अधिका " alkering that a title. There is an agregation, common attributing, the title is the orbital of the contraction of the contrac

माराध्यक्षका नुसारकार केवल महामाराम केवल एकार एक महामार का महामार का महामान है। जो निर्माण का का महामान का की एक हार के विभाग महर्क्या के प्राथम का विभाग के विद्याद कर है। विभाग के विभाग के विभाग के विभाग के विभाग के विभ

स्वाकक्रास्थाम् । १५ १८ व्यक्तिक वर्षाकः । १५ मिर्देशके के विकास महिले के कार के का है जो है। जो के बार के बार के बार का की

के देशिति हार्यक्रमानि बिद्धास्य साधारक है होतात्रक्षाः १, लान्य न्यायान । का व व व विकास स्थान

मृत्राधार्यास्त्रास्यापापार्थाः संदर्भगारमापूर्वेताः द्वीसन्

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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 Village 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 guidance as to keep intact the promotions which have been made on the basis of seniority lists formulated on date of birth or otherwise, please.

Siricerely Yours,

(VIKASH)
Assistant Director (Admin/HR)
LGARDD

Endst: No & date even: Copy forwarded to the

- 1. All Assistant Directors, LGARDD, Khyber Pakhtunkhwa
- PA to Director General, LG&RDD, Khyber Pakhtunkhwa



OFFICE OF THE ASSISTANT DIRECTOR (SENIOR) LOCAL GOVERNMENT &

RURAL DEVELOPMENT DEPARTMENT

MARDAN

No. LG-MRD/Establishment/ うぬ



Dated: 09.07.2024

OFFICE ORDER:

AD/LGSRDD(MRD)/Sentority-list/2023-24 The Competent authority has been pleased to issue updated Tentative Sentority 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&RDD KPK circular No.Director(LG)3-1/Establishment/2022/2343-49 dated Poshawar, the 24th October,2022 & Office Order No.Director(LG)3-1/Establishment/2022/4888-94 dated Poshawar, the 15th November,2022 (Attached).

Encl: Tentative Seniority List

Assistant Director (Senior LG&RDD Mardan

Endst. Even No. and Dated

Copy to the above is forwarded to:

- 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, Tehsii Mardan, Takht-Bhai, Rustam, Katlang & Garhi-Kapoora District Mardan.
- 6. Progress Officer, Tehsil Mardan, Takht-Bhal, Rustam, Katlang & Garhl-Kapoora District Mardan.
- 7. All Secretaries VC/NC's District Mardan.
- 8. Office File.

Assistant Director (Senior)

adigmardan1@gmail.com

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

			Date of Birth	MARDAN Appointment Date		Remarks,	Marks	Remarks
No N	ome	Father Name	Date of Direct			Appointed as Secretary (BPS-7)	85.5	Nil
Muhan	nmad Arif	Fakhruz Zaman	04/04/1991	23/02/2016	23/02/2016	on 23.02.2016		Nil
		Decdan Gul	13/02/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02-2016	85	
Lia	qat Ali		a c (ca)(a00	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	85	Nil
Ihsa	n Uddin	Burhan Ud Din	15/03/1990		<u></u>	on 23.02.2016 Appointed as Secretary (BPS-7)	84.5	Nil
Wase	em Shah	Nader Shah	25/04/1989	23/02/2016	23/02/2016	on 23.02.2016		Nil
		Gul Rehman	07/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	84.5	
Jeff:	ar Khan	•	·	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	84	Nil
Tahi	r Hussain	Akbar Hussain	11/02/1990		<u> </u>	on 23.02.2016 Appointed as Secretary (BPS-7)	83.5	Nil
lm:	an Khan	Alam Zeb	12/04/1989	23/02/2016	23/02/2016	on 23.02.2016	03.6	Nil
	4	Gul Rosh	12/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83.5	
	nmad Asghar Khan	·		23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	83.5	Nil
Shahai	n Khan Nagi	Muhammad Naqi	08/04/1994	231022310		on 23.02.2016 Appointed as Secretary (BPS-7)		Nil
0 HE	amad Ali	Niez Ali	20/03/1990	23/02/2016	23/02/2016	on 23.02.2016		Nil
·		Afzal Khan	01/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83	
ı Saj	ijad Afzal	Alza Kuan	l		23/02/2016	Appointed as Secretary (BPS-7)	83	Nil
2 Muhai	mmad Abbas	Zahid Gul	10/01/1992	23/02/2016	L	on 23.02.2016		Nil
	C A II Chah	Schat Shah	16/02/1992	23/02/2016	23/02/2016	Appointed as Secretary (BFS-7 on 23.02.2016		
3 A5i	f Ali Shah) J.J.J.				3	1 0	

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Waqas Khan	Riaz Khan	21/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83	- Nil
Naik Wali	Sher Wali Khan	10/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82_5	Nil
Numan Khan	Fazal Mir	25/03/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil
Yaseen Ahmad	Noor Muhammad	12/12/1991	23/02/2016	23/02/2016	an 23.02.7016		Nil
Hazrat Umar	Khan Bahadar	11/04/1992	23/02/2016	23/02/2016	on 23.02.1016		Nil
Anwar Ali	Sahz Ali	15/04/1992	23/02/2016	23/02/2016	on 23.022016		Nil
lnayat Ur Rahman	Bakht Zada	30/03/1991	23/02/2016	23/02/2016	on 23.02.2016		Nil
Waqas Khan	Sheryar	07/03/1992	23/02/2016	23/02/2016	on 23.02.2016		Nil
Muhammad Zeb	Rahim Gul	23/03/1992	23/02/2016	23/02/2016	on 23.02.2016		Nël ,
Muhammad Sajjad	Amir Wahab	03/03/1989	23/02/2016	23/02/2016	on 23.02.2016		Nil
Hemalr Ali	Gul Sher	04/04/3991	23/02/2016	23/02/2016	on 23.02.2016	81	Nil
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
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
Bilal Khan	Akmal Khan	17/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80	เก
Muhammad Zeeshan	Lal Mir	20/04/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80	Nîl
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
Habib Ullah	Kifayat Ullah	05/08/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02.2016	- 79	Nil
Musawir Khan	Wazir Gui	03/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	79	· Nil
	Naik Wali Numan Khan Yaseen Ahmad Hazrat Umar Anwar Ali Inayat Ur Rahman Waqas Khan Muhammad Zeb Muhammad Sajjad Hamalr Ali Imran Khan Gul Wahab Bilal Khan Muhammad Zeeshan Muhammad Ibrahim Habib Ullah	Naik Wali Sher Wali Khan Numan Khan Fazal Mir Yaseen Ahmad Noor Muhammad Hazrat Umar Khan Bahadar Anwar Ali Sahz Ali Inayat Ur Rahman Bakhi Zada Waqas Khan Sheryar Muhammad Zeb Rahim Gul Muhammad Sajjad Amir Wahab Hamair Ali Gul Sher Imran Khan Hussain Muhammad Gul Wahab Muhammad Yar Bilal Khan Akmal Khan Muhammad Zeeshan Lai Mir Muhammad Ibrahim Tilawat Khan Habib Ullah Kifayat Ullah	Naik Wali Sher Wali Khan 10:04/1989 Numan Khan Fazal Mir 25:05/1989 Yascen Ahmad Noor Muhammad 12/12/1991 Hazrat Umar Khan Bahadar 11/04/1992 Anwar Ali Sabz Ali 15/04/1992 Inayat Ur Rahman Bakht Zada 30/03/1991 Waqas Khan Sheryar 07/03/1992 Muhammad Zeb Rahim Gul 23/03/1992 Muhammad Sajjad Amir Wahab 03/03/1989 Hamalr Ali Gul Sher 04/04/1991 Imran Khan Hussain Muhammad 10/04/1992 Gul Wahab Muhammad Yar 04/05/1993 Bilal Khan Akmal Khan 17/01/1992 Muhammad Zeeshan Lal Mir 20/04/1994 Muhammad Ibrahim Tilawat Khan 05/04/1991 Habib Ullah Kifayat Ullah 05/08/1992	Naik Wali Sher Wali Khan 10:04/1989 23/02/2016 Numan Khan Fazal Mir 25:05/1989 23/02/2016 Yaseen Ahmad Noor Muhammad 12/12/1991 23/02/2016 Hazrat Umar Khan Bahadar 11/04/1992 23/02/2016 Hazrat Umar Khan Bahadar 11/04/1992 23/02/2016 Anwar Ali Sabz Ali 15/04/1992 23/02/2016 Inayat Ur Rahman Bakht Zada 30/03/1991 23/02/2016 Waqas Khan Sheryar 07/03/1992 23/02/2016 Muhammad Zeb Rahim Gul 23/03/1992 23/02/2016 Muhammad Sajjad Amir Wahab 03/03/1989 23/02/2016 Hamalr Ali Gul Sher 04/04/1991 23/02/2016 Gul Wahab Muhammad Hussain Muhammad 10/04/1992 23/02/2016 Bilal Khan Akmal Khan 17/01/1992 23/02/2016 Muhammad Ibrahim Tilawat Khan 05/04/1991 23/02/2016 Muhammad Ibrahim Tilawat Khan 05/04/1991 23/02/2016 Muhammad Ib	Naik Wali Sher Wali Khan 10-04/1989 23/02/2016 23/02/2016 Numan Khan Fazal Mir 25/03/1989 23/02/2016 23/02/2016 Yaseen Ahmad Noor Muhammad 12/12/1991 23/02/2016 23/02/2016 Hazrat Umar Khan Bahadar 11/04/1992 23/02/2016 23/02/2016 Anwar Ali Sabz Ali 15/04/1992 23/02/2016 23/02/2016 Anwar Ali Sabz Ali 15/04/1992 23/02/2016 23/02/2016 Inayai Ur Rahman Bakht Zada 30/03/1991 23/02/2016 23/02/2016 Waqas Khan Sheryar 07/03/1992 23/02/2016 23/02/2016 Muhammad Zeb Rahim Gul 23/03/1992 23/02/2016 23/02/2016 Muhammad Sajjad Amir Wahab 03/03/1989 23/02/2016 23/02/2016 Hamar Ali Gul Sher 04/04/3991 23/02/2016 23/02/2016 Imran Khan Hussain Muhammad 10/04/1992 23/02/2016 23/02/2016 Bilal Khan Akmal Khan 17/01/1992 23/02/2016	Naik Wali Sher Wali Khan 10:04/1989 23/02/2016 23/02/2016 Appointed as Secretary (BPS-7) on 23.02/2016 Ap	Naik Wali Sher Wali Khan 10-04/1989 23/02/2016 23/02/2016 Appointed as Secretary (BPS-7) 82-5 on 23.02/2016 Appointed as Secretary (BPS-7) 81.5 on 23.02/2016 Appointed as Secretary (BPS-7) 80.5 on 23.02/2016 Appointed as Secretary (BPS-7) on 23.02/2016 Appointed as Secretary (BPS-7) on 23.02/2016 Appointed as Secretary (BPS-7)

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52 	Nasir Khan	Mehraban Shah	21/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	78.5	Nil
3	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
	Salman Akhtar	Amir Ud Din	16/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	77	Nil
5	Abdullah Shah	Muhammad Shah	20/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02,2016	17	Nil
6		Khushal Khan	22/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	.76	Nij
7	Asif Khushal	Sher Zada	04/08/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	76	Nil
58	Sami Ullah	Meher Gul	03/04/1991	23/02/2016	23/02/2016	on 23.02.2016 Appointed as Secretary (BPS-7)	75.5	Nil
i9	Ana Ur Rahman	_	15/03/1992	23/02/2016	23/02/2016	on 23.02.2016 Appointed as Secretary (BPS-7)	75.5	Nil
10	Adil Khan	Bashir Ahmad Khan	06/04/1993	23/02/2016	23/02/2016	on 23.02.2016 Appointed as Secretary (BPS-7)	75.5	Nil
41	(bad Ullah	Darwish Khan		23/02/2016	23/02/2016	on 23.02.2016 Appointed as Secretary (BPS-7)	75.5	Nil
42	Akbar Ali	Abdul Samad	02/02/1995		23/02/2016	on 23.02.2016 Appointed as Secretary (BPS-7)	75	Nil
43	Naseer Khan	Jafar Khan	02/05/1994	23/02/2016	23/02/2016	on 23.02.2016 Appointed as Secretary (BPS-7)	75	Nil
44	Faroog Badshah	Salch Badshah	15/08/1994	23/02/2016	,	on 23.02.2016 Appointed as Secretary (BPS-7)	74.5	Nil
45	Muhammad Saqib	Raheem Khan	15/04/1991	23/02/2016	23/02/2016	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	Nil
47	Muhammad Salma	n Hussain Khan	24/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016		lin lin
48	Aman Khan	Walreed Ullah	06/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	
	<u> </u>	Farman	05/03/1990	23/02/2016	21/02/2016	and the second second	74	Nil
49	Muhammad Asad Zia		<u>`</u> _			the management		1,3925

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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	NH ,
51	Muhammad Junaid	Muhammad Yaseen	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 (BPS-7) on 23.02.2016	74	Nil
53	Ali Raza	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	20/02/1996	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	73	Nil
58	Tahir Rahman	Yousaf 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	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	Hussain Muhammad Arif	Mir Alam	12/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	ทัก
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	NiJ
62	Abdul Hasceb	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 Alî	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	Nit
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	Syed Jamal Shah	15/08/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	71.5	Nil

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68	Zahid Hussain,	Gul Zada	09/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nil
64	Zakir Khan	Taza Gul	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nii
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	Namoos Khan	01/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (DPS-7) on 23.02.2016	71	Nil
72	Muhammad Yaqub	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	Nîl
74	Mohsin Khan	Hassan Khan	01/08/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70	Nil
75	Bilal Khan	Alam Zeb Khan	15/01/19 9 3	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	Imtiaz Ali	Aziz Ullah	10/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	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 Jamai Shah	25/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	64.5	Nil
82	Sajjad A1i	Syed Hussain	15/01/1996	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	64.5	Nil
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	Nif
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	NII

S6 ,	Içfan Ullah	Khafid Khan	10/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	62	Nil
S7	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 Zarnan	05/02/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	61.5	Nil
89	Imad Naecm	Fazli Nacem	10/03/1992	23/03/2016	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)	57	Nil
93	Hassan Nasir	Sabir Ali	02/02/1995	23/02/2016	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

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

BEFORE 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;

- 1. 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-1")

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 senjority list which was not



objected by anyone hence, got finality and vide Office Order No. /AD/LG&RDD/MRD/RSTAII/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: 03/11/2021 and both lists 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-VEstablishment/2022/4978-94, Dated: 15th November, 2022 of the Directorate General Local Government & Rural Development Department Kluyber 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 objectors 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: 18/16/2023 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 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/Scniority 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 biased 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 2018 SCHR 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 of kindness.

S.No.	Name	G. Name	D.O.B	Signature
ſ.	Imtiaz Ali	Aziz Ullah	10/01/1989	8
2.	Sabir Khan	Momia Khan	13/01/1989	tun)
3.	Muhammad Sajjad	Amir Wahab	03/03/1989	500
4.	Tahir Rahman	Ghafoor Rahman	05/03/1989	COAR
5.	Muhammad Aril	Muhammad Ghawas	27/03/1989	With
6.	Risz Ali	Muhammad Tabir	06/01/1990	COOP
7.	Hassan Nasir	Sabir All	05/05/1982	Desir
8.	Syed Amjid Ali Shah	Syed Jamai Shah	15/08/1991	a

Dated: 22-07- 2024



OFFICE OF THE ASSISTANT DIRECTOR (Senior) LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT

MARDAN



No: LG-MRD/Establishment/ 434

_ 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

Copy Forwarded to:

- 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 Makdan

	FINAL SENIORITY L	<u>JIST OF SECRETARI</u>	<u>ES YC/NC ON THE BA</u>	SIS OF MERIT LIS	<u>TIAGGREGA</u>	TE+INTERVIEW MARKS) DISTRICT MARDAN	,
S.No	. Name	Father Name	Date of Birth	Appointment Date	Current l'ost	Remarks	Marks
	Mehammad Arif	Faklır uz Zaman	04.04 [991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	85.5
2	Lingat Ali	Deedan Gul	13.02 1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	85
	Usan Uddin	Burhan Ud Din	15.03.1990	23.02.2016 /	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	85
	Waseem Shab	Nadar Shah	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	1991,10,70	23.02.2016	23,02,2016	Appointed as Secretary (BPS-7) on 23.02.2016	84.5
	Tahir Hussain	Akbar 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
السينسيا		Gul Rosh	12.04,1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	83.5
	Shahau Khan Nagi	Muhammad Nagi	08.04,1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	83.5
	Hamad Ali	Ninz Ali	20.03.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	83
	Sajjad Afzal	Afzal Khan	01.04.1990	23.02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	83
	Muhammad Abbas	Zahid Gul	10.01.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
,-	Asif Ali Shah	Sehat Shah	16.02.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
	Waqas Khan	Riaz Khan	21.04,1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	83
	Naik Wali	Sher Wali Khan	10.04.1989	23,02,2016		Appointed as Secretary (BPS-7) on 23.02;2016	82,5
	Numan Khan	Fazal Mir	25,03.1989	23.02.2016	23.02.2016	Appointed as Secretary (8PS-7) on 23.02.2016	82
	Ubaid Ur Rahman	Saif ur Rahman	15.04.1989	23.02.2016	23,02,2016	Appointed as Secretary (BPS-7) on 23.02.2016	82
	Yaseen Ahmad	Noor Muhammad	12.12.1991	23.02.2016	23,02,2016	Appointed as Secretary (BPS-7) on 23.02.2016	82
	Hazrat Umar	Khan Bahadar	11.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	82
20	Anwar Ali	Sabz Ali	15.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	82
21.	Inayat Ur Rahman	Bakht Zada	30.03.1991	23.02.2016	23,02,2016	Appeinted as Secretary (BPS-7) on 23.02.2016	81.5
22	Wagas Khan	Sheryar	07.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	B1.5
23	Muhammad Zeb	Rahim Gul	23.03.1992	23.02,2016	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	23.02,2016	Appointed as Secretary (BPS-7) on 23.02.2016	81
25	Hamair Ali	Gul Sher	04.04.1991	23.02.2016	23,02,2016	Appointed as Secretary (BPS-7) on 23.02.2016	81
26	Imran Khan	Hussain Muhammad	10.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	80.5
27	Gul Wahab	Muhammad Yar	04.05.1993	23.02,2016	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	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	80
·	Muhammad Zeeshan	Lal Mir	20.04.1994	23.02.2016	23.02.2016	Appointed as Secretary (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 23.02.2016	79.5

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. 1/	-		Kifayat Ullah	05.08.1992	23.02.2016	23.02.2016	Appointed as Secretary (DPS-7) on 23.02.2016	1 70
} <i>[</i>	35	Musawir Khan	Wazir Gul	03.03.1993	23.02.2016	23.02.2016	Appointed at Secretary (BPS-7) on 23.02.2016	79
f'		Nasir Khan	Mehraban Shah	21.01.1991	23.02.2016	23.02:2016	Appointed as Secretary (BPS-7) on 23.02.2016	78.5
A	34	Tariq Shah	Syed Wali Sluh	22.06.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23:02.2016	78.5
	35	Basit Ali	Muhammad Ali	29:04.1995	23,02,2016	23.02.2016	Appointed as Societary (BPS-7) on 23.02.2016	77.5
<u>. </u>	36	Salman Akhtar	Amir 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 Shafi	20.03.1993	23.02.2016 .	23.02.2016	Appointed as Scorelary (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 Zoda	04.08.1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	776
•	10	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
1	41	Adit 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	Appeired as Secretary (BPS-7) on 23:02-2016	75.5
	43	Akliar Ali	Abdul Samad	02.02.1995	23.02.2016	23.02.2016	Appeinted as Secretary (BPS-7) on 23.02.2016	75.5
7	44	Nascer Khan	Jafar Khan	02.05.1994	23.02.2016	23.02.2016	Appeinted as Secretary (BPS-7) on 23.02.2016	75
	45.	Faroog Badshah	Saleh Bodshah	15.08.1994	23.02.2016	- 23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	75
	46	Muhammad Saqib Khan	Raheem Khan	15.04.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5
	1,47	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
. `	49	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
		Farhad Ali	Liagat Ali	03.04.1990	23.02.2016	23.02.2016 -	Appointed as Secretary (BPS-7) on 23.02.2016	74
	5 <u>2</u>	Muhammad Junaid	Muhammad Yaseen	03.01.1992	23.02.2016	23.02.2016	Appointed as Socretary (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
. 1	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
ا. ، ا	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
· • [Muhammad Waqas	Sheikh Muhammad	20.02.1996	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	73
- t	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 Urhar	04.05.1993 -	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5
• • [64	Arshad Ali	Jan Syed	(7.03.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72
1,041	. 65	Salman Utlah	Pir Muhammad	13.03.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	72
, [shfaq 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	171.5

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A. C.	- '	•	and the second		•		•
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t in	le	المناهدة المعادما	1 1			42.03.3816	1 1
	Syed Amjid Ali Shah	Syed Jamal Shah	15.03.1991	23.02.2016	23.02.2010	Appointed as Secretary (IIPS-7) un 23.02.2016	71.5
69	Zohid Hussain	Gul Zada	09.02.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 2002.2010	·71
70.	Zakir Khan	Taza Gul	17.03.1991	23.02.2 <u>016</u>	23.02.:2016	Appointed as Secretary (UPS-7) on 23,02,2016	71
· 7L	Haider Sher	Umar Stier	15.03,1993	23,02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23,02,2016	71
72 ·	Muhammad Sahib	Namoos Ehan	1 -01,05,1994	23.02.2016-	23.02,2016	Appointed as Secretary (BPS-7) on 23.02,2016	71.
73	Muhammad Yaqub	Muhammad Ibmhim	12.01.1992	23.02.2016	23.02.2016	Appointed to Secretary (BPS-7) on 23.02.2016	70.5
74	Irfon Khan	Fazli Qatter	28.08.1990	23.02.2016	23.02.2016	Appointed as Secretary (DPS-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	Bilal 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,	Anyar Zeb	′ 05.05.1993, <i>:</i>	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	68.5
. 78	Gul. Taj	Zahir Taj	01.03.1990	21.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	67
7 79	lmtiaz Ali	Aziz Ullah	/ f0.01,1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016.	66
. 80	Junaid Ur Rehman	Kifayat Ullah	. 01.02.1991	23,02,2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	65
81	Syed Saif Ullah	Syed 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	61.5
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	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	63.5
. 85	Amin (I) Haq	Mumtaz Khan	. 30,05,1992.	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) out 23.02.2016	.63,5
86	Mubassir Khan	Bakht Taj	05.09.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	63.5
87	Irfan Ullah	Khalid Khan	. 10.05,1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	62 · .
- 88	Riaz Ali	Muhammad Tahir	- 06,01.1990	23.02.2016	23.02.2016 -	Appointed as Secretary (BPS-7) on 23.02.2016	61.5
89	Salid 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 Nocem	Fazli Nucem	10,03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	61
1 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	Momin 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	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	57
94	Hassan Nasir	Sabir Ali	02.02.1995	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	54.5
95	Favad Ali	Imtiaz Khan	17.03.1992	23.02.2016		Appointed as Sceretary (BPS-7) on 23.02.2016	49
96	Wajid Ali	Ali Haider	10,02,1987	02.05.2016	02.05.2016	Appointed as Secretary (BPS-7) on 02.05.2016	84
97	Muhammad Anas	Makhtiar Hussain	04.02.1991	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	81
98	Fida Muhammad Khan	Sojad Ali	22/01/1992	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20,05,2016	81
.99	Zakir Khan Dacha	Muhammad Vmar	13/02/1990	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	76
100	Liagat Shah	Serieraz Khan	5/11/1994	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	
101	Shawakat Ali	Shah Pasand Khan-1	13/04/1991	20,05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	71
102	Jamil Khan	Muhammad Khan	10/02/1994	20.05.2016	20.05.20]6	Appointed as Secretary (BPS-7) on 20.05.2016	. ,70
103	Muhammad Ali	Taj Weli Shah	3(/03/1991	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20,05,2016	· 70
103		Multan	2/03/1991	20.05.2016	20.05,2016	Appointed as Secretary (BPS-7) on 20.05.2016	69
104	receipe reminin	1-1-0-14041		1		7777010	65.5

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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 Paisal	Akmal Khan	1/02/1992	20.05.2016	20.05.2016	Appointed as Secretary (BPS-/) on 20.05.2010	G3.5
107	Zia Ul Haq Adil	Amin'Ul tlau	30/03/1991	23,05,2016	23.05.2016	Apprinted as Secretary (BPS-7) on 23.05.2016	
108		Anwar Ul Hag	23/05/1993	15.09.2017	15.09.2017	Approinted as Secretary (SPS-7) on 15.09.2017.	
109		Feroz Shan	17.01.1990	25.09.2017	25/09/2017	Appointed as Secretary (BPS-7) on 25.09.2017;	
110		Maroof Shah	05.01.1989	23.02.2018	23/02/2018	Appointed as Secretary (BPS-7) on 23.02,2018	<u> </u>
		Inayat Ali Shah	02.05.1998	30.11.2018	30.11.2018	Appointed as Secretary (BPS-7) un 30.11.2018 under deceased son qual.	-
112 -	Mohib Ullah	Hamish Gul	15,03,1971	02.06,1990	30.04.2019	Promoted to Secretary (BPS-9) on 30.04.2019	· •
113		Pagir Hussain	03.04.1974	25.07.1993	30.04.2019	Promoted to Secretary (BPS-9) on 30,04,2019	
		Shamshad Khan	12.04.1973	16.03.1994	30,04:2019-	Promoted to Secretary (BPS-09) on 30.04.2019	
		Jamshid Muhammad	27.02.1969	18.05.1994	30/04/2019	Promoted to Secretary (BPS-09) on 30.04.2019	
. 115	Zakir Muhamamd		12.07.1971	01.01.1995	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	
116		Muhammati Rahim	04.02.1983	20/10/2005	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	Ĺ
117		Muhammad Aslam	20.04.1977	22.04.2013	30,04,2019	Promoted to Secretary (BPS-09) on 30.04.2019	
118		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		Miraj Muhammad		03.04.2015	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	
121	Sami Ullah	Aman Ullah Khan	11.05.1979 15.01.1989	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	136
122	Jan Muhammad	Shams UI Qamar		05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	135.5
123	Muhammad-Imran	Muhammad Parvez	03.03.1990	05.07:2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	128
124	Nouman	Ghulam Rasoul	25.04.1993	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	127
125	Kashan Ali	Ensan Ali	01.09.1993	05.07.2019	05,07,2019	Appointed as Secretary (BPS-9) on 05.07.2019	127
126	Umair Khan	Siraj Ur Rehman	07.04.1995	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	126.5
127	Abdul Nacem Khan	Abdul Qayum Khan	03.04.1993	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07 2019	125
128	Ihtisham UI Haq	Noor UI Haq	20.08.1987		05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	125
129	Sibghat Ullah	Jala Ud Din	09.03.1992	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	125
130	Wisal Muhammad	Gul Nabi	05.03.1994	05.07.2019		Appointed as Secretary (BPS-9) on 05.07.2019	118.5
131	Muhammad Taimoor khan	Gul Bahadar	17.06.1999	05,07.2019"	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	1173
132	Sajad	Aman Ullah Khan	05.03.1992	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	05.07.2019		114
134	Farhad Ali	Murad Ali	06.02.1995	05.07.2019	0\$.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	
135	Muhammad Abbas Khan	Zulligar Ali	102.02.2000	22.07.2019	22.07.2019	Appointed as Secretary (BPS-9) on 22.07.2019 under deceased son quota.	, ,
136	Sadam Hussain	Rahim Gul	25.04.1996	26.07.2019	26.07.2019	Appointed as Secretary (BPS-9) on 26.07.2019	121
	Abdul Majid	Mocen Ud Din	24.03.1995	18.05.2020	18.05,2020	Appointed as Secretary (BPS-9) on 18.05.2020	128
137		Zahir Shah	10.09.1994	18.05.2020	18.05.2020	Appointed as Secretary (BPS-9) on 18.05;2020	114
138	Zeeshan Ahmad	Fazli Rahman	29.03.1993	12.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06 2020	
139	Adnan Khan	Nihar Muhammad	18.04.1992	19.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	<u>L</u>
140	Shehryar Khan	STAINER ASTROMASSION				(

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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 PAKUTUNKHWA

In the Matters

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

Subject:

ngninst the Office Order bearing Apeal 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 accordance to seniority 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.

(Coples of Office Order Dutedt 08/11/2021 and both lists are hereby attached as Annexure "H", "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 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 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 & 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

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(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 biased 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 Tahir Reliman



DIRECTORATE GENERAL LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT KHYBER PAKHTUNKHWA

To

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

1. Mr. Imtiaz Ali

Junior Village Secretary (BPS-09), District Mardan.

2. Mr. Tahir Rehman

Junior Village Secretary (BPS-09), District Mardan.

3. 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.

COMPLAINT AGAINST THE RECENT SENIORITY LIST BEARING

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 hereby 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.

G&RDD

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

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

ASSISTANT DIRECTOR (ADMIN/HR) LG&RDD

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

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Jahix Rahman	(APPELLANT) (PLAINTIFF) (PETITIONER) RSUS
- Gont	(RESPONDENT) (DEFENDANT)
Advocate Supreme Court to withdraw or refer to arbit Counsel/Advocate in the above for his default and with the auth Advocate Counsel on my/our Advocate to deposit, withdraw	ute Noor Mohammad Khattak appear, plead, act, compromise tration for me/us as my/our noted matter, without any liability nority to engage/appoint any other cost. I/we authorize the said and receive on my/our behalf all eposited on my/our account in the
Dated//202	CLIENT
	ACCEPTED
	NOOR MOHAMMAD KHATTAK ADVOCATE SUPREME COURT
	WALEED ADNAN
& &	UMAR FAROOQ MOHMAND KHANZAD GUL
OFFICE:	ABID ALI SHAH ADVOCATES

Flat No. (TF) 291-292 3rd Floor, Deans Trade Centre, Peshawar Can*tt. (0311-9314232)