FORM OF ORDER SHEET

Court of___

Appeal No.

1622/2024

S.No. Order or other proceedings with signature of judge Date of order proceedings ž 1 3 27/09/2024 1-The appeal of Mr. Sabir Khan presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 01.10.2024. Parcha Peshi given to counsel for the appellant. By order of the Chairman GISTRAR

THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

CHECK LIST V/S

t

MR. SABIR KHAN

DIRECTOR LG&RDD

<u>></u> <u>NO</u>	CONTENTS	YES	<u>NO</u>
1.	This petition has been presented by: Noor Muhammad Khattak Advocate Supreme Court	V	<u> </u>
2.	Whether Gounsel/Appellant/Respondent/Deponent have signed the requisite documents?	1 V	
3.	Whether appeal is within time?		
4.	Whether the enactment under which the appeal is filed mentioned?	1.1	- <u>-</u>
5.	Whether the enactment under which the appeal is filed is correct?		r{
6.	whether and avit is appended?	$\overline{}$	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	$\overline{1}$	
8.	whether appeal/annexures are properly paged?	$\overline{\cdot}$	
9.	Whether certificate regarding filing any earlier appeal on the subject furnished?		
10.		$-\frac{1}{\sqrt{2}}$	
11.	Whether annexures are attested?	- V	
12.	Whether copies of annexures are readable/clear?		
13.	Whether copy of appeal is delivered to AG/DAG?	$\overline{}$	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by		·{
	petitioner/appellant/respondents?	V	
15.	Whether numbers of referred cases given are correct?		
16.	Whether appeal contains cutting/overwriting?	×	·
17.	Whether list of books has been provided at the end of the appeal?		
18.	Whether case relate to this court?	<u>ل</u> ر ا لر	
19.	Whether requisite number of spare copies attached?	$\overline{\mathbf{v}}$	
20.	Whether complete spare copy is filed in separate file cover?		
21.	Whether addresses of parties given are complete?		
22.	Whether index filed?		
23.	Whether index is correct?		
24.	Whether Security and Process Fee deposited? On	1	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along		
1	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	——	
		Į	

It is certified that formalities/documentation as required in the above table have been fulfilled. Name:- Noor Muhammad Khattak, ASC

Signature:-Dated:-____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO____/ 2024

MR. SABIR KHAN

K

V/S

DIRECTOR LG&RDD

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APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK ADVOCATE SUPREME COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1622 -P/2024

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

VERSUS

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

..... RESPONDENTS

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

Prayer:-

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

<u>R/SHEWETH:</u> <u>ON FACTS:</u>

- 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 33 of the seniority list of the respondent department. Copy of seniority list is attached as annexure.

3.

-] -

- 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 2 of the seniority list. Copy of seniority list is attached......E

- 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

-3-

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

<u>Grounds:</u>

- 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.

That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 25-08-2024

THROUGH:

NOOR MUHAMMAD KHATTAK ADVOCATE SUPREME COURT

APPELLANT

UMAR FAROOO MOHMAND m

ADVOCATES HIGH COURT

WALEED ADNAN

Advoca

CERTIFICATE:

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

<u>AFFIDAVIT</u>

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

DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO_____ / 2024

MR. SABIR KHAN

V/S

DIRECTOR LG&RDD

-5

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

<u>R/SHEWETH:</u>

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

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

THROUGH:

APPLICANT

DEPONENT

ADVOCATE SUPREME COURT

AFFIDAVIT:

I, Sabir Khan, (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,

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المعتد ويجرافهم المحرفين وابلج المجرفين البرافيج

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OFFICE OF THE DEPUTY COMMISSIONER MARDAN No._604/DC (M) Dated Mardan, the: 23/02/2016

APPPOINTMENT ORDER

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

Sr.#	Name	Father Name		
1	Tahir Rahman		D.O.B	Appointed for VC/N
		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 All	Niaz Ali	20-03-1990	
5	Muhammad Asad zia	Farman-ud-Din	05-03-1990	
6	Muhammad Abbas			Manga-2
7	Muhammad Arif	Muhammad Shafi	07-10-1988	Mardan Khas-2
		Muhammad Ghawas	27-03-1989	KasKoroona-1
8	Waqas Khan	Riaz Khan	21-04-1992	KasKoroona-2
9	Nasir Khan	Mehraban Shah	19-01-1991	KasKoroona-3
10	Yaseen Ahmad	Noor Muhammad	12-12-1991	Khazana Dheri-1
11	Arshad Ali	Jan Said	17-03-1991	Khazana Dheri-2
12	Tahir Hussain	Akbar Hussain	11-02-1990	Sheikh Yousaf-1
13	Syed Amjid Ali Shah	Syed Jamal Shah	15-08-1991	
14	Ammar Hassan	Gulzar Ali		Sheikh Yousaf-2
15			23-09-1992	Bughdad Rural-1
	Umar Hayat	Nadir Khan	31-10-1987	Bughdad Rural-2
	Mubassar Shah	Fazle Malik	18-03-1992	Chamtar Dheri
.7	Junid Rahman	Kifayatuliah	01-02-1991	Dagai-1
8	Muhammad Ismall	Sher Muhammad Khan	<u>i</u>	Dagai~2
9 1	Muhammad Junid	Muhammad Yaseen		Bagh-e-Irum-1
	labibuliah	Niaz Nabi		-
1 1	Tambor Khan		173-04-1990	Bagh-e-Irum-3
		Abdul Sattar	01-03-1987	Chak Toru
2	fuhammad Illaf	Muhammad Khursheed	16-03-1992	Khawaja Rashaka

Miller

23	Imtiaz Ali	Azizullah -8	10-01-1989	Bakri Banda
24	Hazrat Umar	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	Faiz-ur-Rahman	19-09-1986	Chowki
29	Naseer Khan	Jafar Khan	02-05-1994	Ghala Dher
30	Farhad Ali	Llaqat Ali	03-04-1990	Khawo
31	Raid Ali	Muhammad Ali	16-03-1990	Hoti-3
32	Haider Sher	Umar Sher	15-03-1993	Guli Bagh-1
33	Ali Raza	Nisar Muhammad	15-12-1990	Bicket Gunj-1
34	Shahan Khan Naqi	Muhammad Nagi	08-04-1994	Bicket Gunj-3
35	Zahoor All	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	04-03-1991	Qəsim
42.	Asad All	Karim Khan	01-11-1990	Sharif Abad
43	Bilal Khan	Akmal Khan		
44	Muhammad Imran		17-01-1992	Alia Dad Khel-2
		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	Tshfaq Ali	Muhammad Irshad	20-10-1994	Geeder
48	Muhammah Haris Amin	Rooh-ui-Amin	29-04-1993	Baghicha Dheri-1
49	Gul Taj	Zahir Taj	01-03-1990	Baghicha Oheri-2
50	Imad Naeem	Fazil Naeem	03-10-1992	Garhi Dolat Zai-1
51	Akbar Ali	Abdul Samad	02-02-1995	Garhi Dolat Žai-2
52	Zahoor Muhammad	Fazai Muhammad	81-03-1988	Garhi Ismail Zai-2
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54	Ihsanuddin	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	Obaiduliah	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 Kamal	18-03-1989	Arabi Banda
63	Muhammad Zeeshan	Lai Mir	20-04-1994	Seri Behlol
64	Sami Ullah	Sher Zada	04-08-1994	Daman-E-Koh-2
65	Attauliah	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	Guizada	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 Bilai	Fazal Badshah	15-03-1990	Fazal Abad
74	Mussawer Khan	Wazeer Gul	30-03-1993	Madey Baba
75	Muhammad Kamal Khan	Abdul Qayum Khan	30-06-1990	Tordher
76	Yasir Khan	Sher Zameen	02-03-1987	Takkar-2
77	Inayat Ur Rehman	Bakht Zada	30-03-1991	Dewan Khel
78	Aamir Zeb	Alam Zeb	25-12-1987	Parkho Dheri-1
79	Liaqat Ali	Deedan Gul	13-02-1989	Parkho Dheri-2
80	Mufti Nauman Sadiq	Noor Badshah	01-04-1995	Peer Sadi-1
81	Zahid Hussain	Gul Zada	09-02-1991	Peer Sadi-2
82	Muhammad Ibrahim	Tilawat Khan	05-04-1991	Qutab Garh
83	Asad Ali	Ali Rahman	11-02-1987	Sher Garh-2
84	Khalid Hameed	Fazal Gul	11-11-1987	Sher Garh-3

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85	Taimoor Shah	Wali Muhammad	23-12-1988	Hathian-1
86	Muhammad Farooq Shah	Muhammad Zahir Shah	20-11-1976	Hathian-2
87	Sajjad Afzal	Afzal Khan	01-04-1990	Hathian-3
88	Gul Wahab	Muhammad Yar	04-05-1993	Makory-1
89	Anwar Ali	Sabz Ali	15-04-1992	Makory-2
90	Abdul Haseeb	Hazrat Umar	04-05-1993	Makory-3
91	Numan Khan	Fazal Mir	25-03-1989	Lund Khwar-1
92	Hafiz Janas khan	Khan Sher	01-01-1987	Lund Khwar-2
93	Ubald-ur-Rahman	Safi-ur-Rahman	15-04-1989	Lund Khwar-3
94	Fawad All	Imtiaz Khan	17-03-1992	Jaiala-1
9 5	Komail Hamza	Adam Khan	17-02-1986	Jaiaia-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	Fazal Qadar	28-08-1990	Sangao
102	Muhammad Adil	Abdul Qadar	25-03-1992	Baizo 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	Rahimuliah	21-04-1986	Mata Odi Gram-2
108	Syed Inayat Shah	Mubrak Shah	09-03-1991	Shamozi-1
109	Təlmiz-ur-Rahman	Umar Zameen Khan	20-04-1987	Kaloo
110	Sajid Khan	Said Zaman	05-02-1990	Mian Essa
111	Irfanullah	Khalid Khan	10-05-1994	Mianganoo Kilii Disable
112	Court Case			Zareen Abad
113	Muhammad Zeb	Rahmani Gul	23-03-1992	Alo-1
114	Riaz All Shah	Qadeem Shah	18-03-1988	Alo-Z
115	Abduliah Shah	Mahmood Shah	20-03-1993	Peepal

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116	Fawad Ahmad	Niaz Muhammad	16-03-19	95 Charchoor
117	Zahid Ali	Shafiullah	14-02-19	
118	Ali Shah	Magsood Gul	05-06-19	
119	Naik waii	Sher wali Khan	10-04-19	
120	Farooq Badshah	Salih Badshah	15-08-199	
121	Sajjad Alij	Ayed Hussain		
122	Muhammad Islam	Anwar Zeb	10-01-193	
123	Asif Khushal Khan		05-05-199	
	Shah Faisaí	Khushal Khan	22-04-198	9 Katlang-4
	-	Sarzamin Khan	19-04-199	0 Katti Garhi
	Syed Waqas Ali Shah	Syed Ghaffar Shah	30-04-198	6 Shero-2
	Zui Qarnain Ahmad Qurashi	Habib Muhammad	01-03-199:	1 Jamai Garhi-1
	Umair	Shah Jehan	15-10-1988	Jamal Garhi-2
	Sajid Ali Jan	Allah bakhsh	12-04-1988	Rustam-1
129	Abrar Ahmad	Pazir gul	12-02-1991	Rustam-2
130 1	Muhammad Abbas	Zahid Gul	10-01-1992	
131 E	lilal Khan	Alam Zeb Khan	15-01-1993	
132 5	hanid Hussain	Shahbaz Khan	01-01-1992	
133 A	jmal khan	Umar Khan	02-01-1988	1
134 M	uhammad Asghar Khan	Gul Rosh	12-04-1990	
135 M	uhammad Arif	Fakhruz Zaman		
136 M	ubbásir Khan	Bakhtaj	04-04-1991	Cheena
	aqas Khan		05-09-1993	Jalal Dolat Zai
	roz shah	Shehreyar	07-03-1992	Machai
		Syed Zahir Shah	02-04-1985	Таја
	oran Khan	Hussain Muhammad	10-04-1992	Kher Abad
<u> </u>	riq Shah	Said Wali shah	22-06-1990	Blfandi
41 Sy	ed Feroz Shah	Syed Jamal Shah	25-04-1992	Sawal Dher-2
	hammad Shafiq	Mir Zaman	03-10-1988	Babani
43 Mu	hammad Sajjad	Amir Wahab	03-03-1989	Bakhshali-2
11 Ria	z AN	Muhammad Tahir	01-06-1990	Bala Garhi-1
15 Mul	nammad Salman	Hussain Khan	24-01-1989	· [
6 Has	san Nasir	Haji Sabir Ali	- <u> </u>	Bala Garhi-2
		· · · · · · · · · · · · · · · · · · ·	05-05-1992	Cham Dheri

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<u> </u>				•
147	Muhammad Waqas	Sheikh Muhammad Yousaf	20-02-1996	Fatima-1
148	Jafar Khan	Gul Rahman	01-07-1991	-
149	Amin-ul-Haq	Mumtaz Khan	30-05-1992	_
150	Ibadullah	Darwish Khan	04-06-1993	
151	Hamair Ali	Gul Sher	04-04-1991	Garyala
152	Muhammad Sahib	Namoos Khan	05-01-1994	Bahi Khan
153	Amir Seeyab Yousaf	Haji Mir Zaman	14-04-1988	Gujrat-2
154	Habibullah	Kifayatullah	08-05-1992	Jungara
155	Shakoor Khan	Gulzar Muhammad	20-03-1991	Barikab
156	Safarish Khan	Abdullah	04-03-1994	Katakhat
157	Muhammad Tayyab	Shamshad Khan	02-04-1986	Kotarpan
158	Basit Ali	Muhammad Ali	29-04-1995	Chak Mardan-1
159	Shams-ul- Islam	Taj Muhammad	20-04-1987	Chak Mardan-2
16Q	Hussain Muhammad Irshad	Zahir Shah	+	Mardan Rural-1
161	Zakir Khan	Taza Gul		Mardan Rural-2
162	Wajid Khan	Muhammad Umar Khan		Par Hoti-2
163	Sajjad Khan	Abdur Rahman	25-04-1993	Par Hoti-3

Terms and Conditions:

- 1. Their services shall be governed by rules / prescribed Policy of the Government.
- 2. They will be considered on probation for a period of one year which may be extended for further one year. During the probation period, their services are liable to be dispensed without assigning any reason or notice, if their performance was not found up to the mark.
- 3. This offer of appointment is subject to verification of their academic credentials/ Degrees, certificate etc. from the concerned recognized Board/ Institute/ University etc. If any of the credentials of a person are found fake, his appointment will liable to be cancelled. Moreover, necessary legal action would also be initiated against him.
- 4. Health and age certificate issued by the medical superintendent DHQ Hospital, Mardan be produced before joining the post.
- 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.

1. LOD

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.
- 6. 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)X (Secretary S & R Committee) Mardan.

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		-	Local Govt and	RDD Mardan			
N			Seniority List of Juni	ior Secretaries	(BPS-09)		- .
~			Date of Birth Appol		WEATPAST INCOMENS		
Ň	S.No Name	Father Name	13/04/1950	3 A / 1 3 / 3 0 1 1 1	24/12/2011 Appointed as Ser	retary (BPS-7) on 24.12.2011	
	1 Jamal Ahmad	Riaz Ahmad	20/11/1976	23/02/2016	23/02/2016 Appointed as Se	retary (8P5-7) on 23.02.2019	-1.
N .	2 Muhammad Farcog Shah	Muhammad Zahir Shah	10/06/1981	23/02/2016	23/02/2016 Appointed as Se	retary (BPS-7) on 23.02.2010	
	-3 Ashfaq	Nader Khan	02/04/1985		23/02/2016 Appointed as Se	retary (8PS-7) on 23.02.2010	⊣ , -
6 1	4 Feroz Shah	Syed Zahir Shah Muhim Muhammad	09/11/1985	23/07/2016	23/02/2016 Appointed as Se	CTETBOY (BPS-7) 01 23.02.2010	
V	5 Niaz Muhammad	Nadar Khan	15/01/1965	23/02/2016	13/02/2016 Appointed as Se	cretary (8PS-7) on 23.02.2016	
2	6 lhian Ullah		17/02/1986	23/02/2016	23/02/2016 Appointed as Se	cretary (BPS-7) on 23.02.2016	
	7 Kumail Hornza	Adam Khan	20/03/1996	23/02/2016	23/02/2016 Appointed as Se	cretary (BPS-7) on 23.02.2016	
	6 Abid Ali		15/04/1986	23/02/2016	23/02/2016 Appointed #5 50	cretary (8PS-7) on 23.02.2016	-1
	9 Habib Ullah	Niaz Nabi Syed Ghafar Shah	30/04/1986	23/02/2016	23/02/2016 Appointed as Se	cretary (BPS-7) on 23.02.2016	- -
	10 Syed Wagas Ali Shah	Falz Ur Rahman	19/09/1986	23/02/2016	23/02/2016 Appointed 25 56	cretary (8P5-7) on 23.02.2016	-1
	11 Falz UI Islam	Khan Sher	01/01/1987	23/02/2016	23/02/2016 Appointed as Se	cretary (BPS-7) on 23.02.2016 cretary (BPS-7) on 23.02.2016	-
Dura.	12 Janas Khan	Ahmad	02/02/1987	23/02/2016	23/02/2016 Appointed as Se	cretary (BPS-7) on 23.02.2016	
小把 / /	13 Ismail	Said Zahir Shah	06/02/1987	23/02/2016	23/02/2016 Appointed as 5	cretary (BPS-7) on 23.02.2016	
11	14 Muhammad Younas	Ali Rahman	11/02/1987	23/02/2016	23/02/2016 Appointed as 5	cretary (BPS-7) on 23.02.2016	-1
N KT	15 Asad All	Abdul Satter	01/03/1937	23/02/2016	23/02/2016 Appointed is 5	cretary (BPS-7) on 23.02.2016	
<u>```</u>	16 Taimur Khan	Sher Zamin	02/03/1987	23/02/2016	23/02/2016 Appointed as S	cretary (BPS-7) on 23.02.2016	
	17 Yasir Khan 18 Sajjad Khan	Abdur Rahman	20/04/1987	23/02/2016	23/02/2016(Appointed as S	cretary (BPS-7) on 23.02.2016	
1	18 Sajjad Khan 19 Khalid Khan	Nowsher Khan	12/07/1937	23/02/2016	23/02/2010 Appointed 45 S	ecretary (BPS-7) on 23.02.2016	
- Ki	20 Umar Hayat	Nadir Khan	31/10/1987	23/02/2016	23/02/2016 Appointed 45 5	ecretary (BPS-7) on 23.02.2016	
41	Zi Shali Ullah	Atta Ullah	20/12/1987	23/02/2016	13/02/2016 Appointed 45 5	ecretary (BPS-7) on 23.02.2016	
1	22 Amir Zeb	Alam Zeb	25/12/1987	23/02/2016	23/02/2016 Appointed 15 S	ecretary (BPS-7) on 23.02.2016	
	23 Ajmal Khan	Umar Khan	02/01/1985	23/02/2016	23/02/2016 Appointed 45 S	ecretary (BPS-7) on 23.02.2016	'
12	24 Shah Fehad	Gul Rehman	01/03/1988	23/02/2016	13/07/2016 Appointed 25 2	ecretary (BPS-7) on 23.02.2016	<u> </u>
C.	25 Muhammad Shafiq	Mir Zaman	10/03/1938	23/02/2016 23/02/2016	13/02/2016 Appointed as 5	ecretary (BPS-7) on 23.02.2016	
2 · · · · · · · · · · · · · · · · · · ·	26 Risz Ali Shah	Qadeem Shah	18/03/1988	23/02/2016	73/07/2016 Appointed as 9	ecretary (BPS-7) on 23.02.2016	<u></u>
	27 Zohoor Muhammad	Fazal Muhammad	31/03/1988	23/02/2016	23/02/2016 Appointed as \$	ecretary (BPS-7) on 23.02.1010	
	28 Sadig Ur Rehman	Rej Muhammad	01/04/1988	23/02/2016	23/02/2016 Appointed as	ecretary (BPS-7) on 23.02.2016	
	- 29 Hussein Muhammad Irsh	ad Zahir Shah	06/04/1938	23/02/2016	23/07/2016 Appointed as	ecretary (BPS-7) on 23.02.2016	
. ა	C 30 Sajid Ati Jan	Allah Bakhsh	12/04/1988	23/02/2016	23/02/2016 Appointed as 1	Secretary (895-7) on 23.02.2016	
X	31 Ali Shah	Magsood Gul	05/01/1989	23/02/2016	23/02/2016 Appointed #5	secretary (BPS-7) on 23.02.2016	
	il 32' Imtiaz Ali	Aziz Ullah	10/01/1989	23/02/2016	23/02/2016 Appointed as	Secretary (8PS-7) on 23.02.2016	
	33 Sebir Khan	Momin Khan	13/01/1989	23/01/2016	23/02/2016 Appointed as	Secretary (BPS-7) on 23.02.2016	
atende a	34 Muhammad Saliman	Hussain Khan	24/01/1989	23/02/2016	23/02/2016 Appointed as	Secretary (BPS-7) on 23.02.2016	
	The Logat Ali	Deedan Gui		23/02/2016	1 21/02/2016 Appointed as	Secretary (895-7) or 73.61.7015	
	He Muhammad Sugart	Amir Wahab	03/03/1989	2 3/02/2015		Corretary (8PS-7) on 23 02 2016	

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		••••••••••••••••••••••••••••••••••••••	Final Se	niority List o	of Junior Secretari	es (8PS-09)			· · ·	
	S.No	Name	Father Name		Appointment Date	Current Post		· ·		
•	38	Numan Khan	Fazəl Mir	25/03/1989			Appointed as Secretary (BPS-7)	on 23.02.2016		
	. 39	Muhammad Arif	Muhammad Ghawas	27/03/1989	23/02/2016	23/02/2016	Appointed as Secretary (8PS:7)	on 23.02.2016		
	40	Aman Khan	Waheed Ullah	06/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
۱.	41	Naik Wali	Sher Wali Khan	10/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
1 1	42	Imran Khan	Alam Zeb	12/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016.		
\sim	43	Ubaid Ur Rahman	Saif, Ur Rahman	15/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		1
	44	Asil Khushal	Khushal Khan	22/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
Ň	45	Waseem Shah	Nadar Shah	25/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23,02,2016		•
. 1	46	Muhammad Imran	Said Ahmad Jan	12/12/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
i	47	Riaz Ali	Muhammad Tahlr	06/01/1990		23/02/2016	Appointed as Secretary (BPS-7)			
EAT /	48	Sajid Khan	Said Záman	05/02/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
Q 9 6	49	Tahir Hussain	Akbar Hussain	11/02/1990	23/02/2016	23/02/2016	Appointed as Secretary (BES-7)	or 23.02.2016		
North-	50	Gul Taj	Zahir Taj	01/03/1990	23/02/2016	23/02/2016	Appointed as Secretary [BRS-7]	on 23.02.2016		
MU R	51	Muhammad Asad Zia	Farman	05/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02,2016		
Ч []	52	Ihsan Uddin	Burhan Ud Din	15/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
تغذي	53	Hamad All	Niaz Ali	20/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7)	on 23,02.2016		
- /	54	Sajjad Afzai	Afzal Khan	01/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
	55	Farhed Ali	Uagat Ali	03/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
UN I	56	Muhammad Asghar Khan	Gul Rosh	12/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
1	57	Tariq Shah	Said Wali Shah	22/06/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
	58	Irfan Khan	Faxii Qadar	28/08/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
	59	Syed Bilawal Hussain	Syed Bashir Hussaln	25/09/1990	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7)	on 23.02-2016		
	60	Ali Raza	Nisar Muhammad	15/12/1990	23/02/2016		Appointed as Secretary (BPS-7)			
17	61	Jafar Khan	Gul Rehman	07/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
11	62	Nasir Khan	Mehraban Shah	21/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
Jen -	63	Junaid Ur Rehman	Kifeyat Ullah	01/02/1991	23/02/2016		Appointed as Secretary (BPS-7)			
	64	Zahid Hussain	Gul Zada	09/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (6P5-7)	an 23.02.2016 1		
•	65	Muhammad Arif	Mir Alam	12/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
	66	Abrar Ahmad	Pazir Gul	12/02/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2015		Ţ
	67	Salman Akhtar	Amir Ud Din	16/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		NI
•	68	Zakir Khan	Taza Gul	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23:02.2016 "1	اختذ	
	69	Arshed Ali	Jan Sald	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
		Inayat Ur Rahman	Bakht Zada	30/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23,02,2016		
	71	Muhammad Asif	Ghulam Hussain	31/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
· · · · · · · · · · · · · · · · · · ·	· 72	Allo Ur-Rahman	Meher Gul	03/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		
see a second	73	Muhammad Ard	Fakhruz Zaman	04/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2015		
F ·	74	Hamair Ali	Gul Sher	04/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	on 23.02.2016		

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			Local Govt an	id ŘDD Marda	n `		
_		Final S	eniority List of Ju				
<u>S.N</u>	No Name	Father Name	Date of Birth App		Current Post	B-marke	
75	The second second and the second seco	Tilawat Khan	05/04/1991	/ 23/02/2016	73/02/2016	Remarks	
76	Contraction of the second	Raheem Khan	15/04/1991	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	
77		Hassan Klian	01/08/1991			Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	
78	- / · · · · · · · · · · · · · · · · · ·	Syed Jamal Shah	15/08/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	
79		Noor Multammad	12/12/1991			Appointed as Secretary (8PS-7) on 23.02.2016	ť •
80		Shah Baz Khan	01/01/1992	23/02/2016	23/02/2016	Appointed as secretary (BPS-7) on 23.02/2016	<u> </u>
81		Muhammad Yaseen	03/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (6PS-7) bit 23:02:2016	
82	Muhammad Abbas	Zahid Gut	10/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) or 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	
83		Muhammad Ibrahim	12/01/1992	23/02/2016		Appointed as Secretary (BPS-7) on 23.02.2016	
84		Akmal Khan	17/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7) on 23.02.2016	<u> </u>
85	Asif Ali Shah	Schat Shah	16/02/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on:23.02.2016	
86		Sheryar	07/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	'`
87		Fazil Nacem	10/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
88		Bashir Ahmad Khan	15/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	
89		Imtlaz Khan	17/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	_ <u>[</u>
90	Mubassar Shah	Fazle Malik	18/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23,02,2016	<u> </u>
91	Muhammad Zeb	Rahim Gul	23/03/1992	23/02/2015	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
92	Muhammad Adil	Abdul Qadir	25/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7) on 23.02.2016	
93	Muhammad Zaib	Falz Muhammad	08/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (8PS-7) on 23.02.2016	
94	Imran Khan	Hussain Muhammad	10/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	—
95	Hazrat Umar	Khan Bahadar	11/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
96	Anwar Ali	Sabz Ali	15/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
97	Waqas Khan	Riaz Khan	21/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
98	Syed Feroz Shah	Syed Jamal Shah	25/04/1992	23/02/2015	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
99	Amin Ul Haq	Mumtaz Khan	30/05/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	-1
		Kifayat Ullah	05/08/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	
	Bijal Khan	Alam Zeb Khan	15/01/1993	23/02/2016	23/02/2016	appointed as Secretary (BPS-7) on 23.02.2016	
	Musawir Khan	Wazir Gui	03/03/1993	23/02/2016	23/02/2016	appointed as Secretary (BPS-7) on 23.02.2016	
	Salman Ullah	Pir Muhammad	13/03/1993	23/02/2016	23/02/2016	appointed as Secretary (BPS-7) on 23.02.2016	
	Haidor Sher	Umar Sher	15/03/1993	23/02/2016	23/02/2016 4	opointed as Secretary (BPS-7) on 23.02.2016	
105	Abdullah Shah	Muhammad Shah	20/03/1993	23/02/2016	23/02/2016 4	oppointed as Secretary (BPS-7) on 23.02.2016	
	Ibad Ullah	Darwish Khan	06/04/1993	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23.02:2016	
	Gul Wahab	Muhammad Yar	04/05/1993	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23.02-2015	
	Abdut Haseeb	Harrat Umar	04/05/1993	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23.02.2016	- <u>1</u>
	Muhammad Islam	Anwar Zeb	05/05/1993	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 73.02 2015	
	Muhacele Khan	Sathe Toj	05/09/1993	23/02/2016	23/02/2016 A	ppointed as Secretary (BPS-7) on 23.02.2016	-1
	Shahan Khan Naqi	Muhammad Nagi	08/04/1994	23/02/2016	23/02/2016 4	ppointed as Secretary (BPS-7) on 23.02.2016	

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				t and RDD Marda			<u> </u>		
	o Name			f Junior Secretari					
	2 Muhammad Zeeshan	Father Name			Current Post				
	3 Muhammad Sahib	Namoos Khan	20/04/1994		23/02/2016	Appointed as Secretary (I	3PS-7) on 23.02.2016		
	Vaseer Khan	Jafar Khan	01/05/1994			Appointed as Secretary (I	JPS-7) on 23.02.2016		
	5 Irlan Ullah	Khalid Khan	02/05/1994			Appointed as Secretary (I	3PS-7) on 23.02.2016		
	5 Sami Ullah		10/05/1994	23/02/2016		Appointed as Secretary (E	JPS-7) on 23.02.2016		
117		Sher Zada	04/08/1994	23/02/2016	23/02/2016	Appointed as Secretary (E	JPS-7) on 23:02:2016		÷
118		Saleh Badshah	15/08/1994	23/02/2016		Appointed as Secretary.(E	JPS-7) on 23.02,2016		
_	Hassan Nasir	Muhammad Irshad	20/10/1994	23/02/2016	23/02/2016	Appointed as Secretary (B	IPS-7) on 23.02:2016	- 羽菱沙	
	Akbar Ali	Sabir Ali	02/02/1995	23/02/2016		Appointed as Secretary (B	IPS-71 on 23.02.2016		
121		Abdul Samad	02/02/1995	23/02/2016	23/02/2016	Appointed as Secretary (B	IPS-7) on 23.02.2016	0 3	٠
		Naz Muhammad	16/03/1995	23/02/2016	23/02/2016	Appointed as Secretary (B	PS-7) on 23.02.2016 .		
122		Noor Badshah	01/04/1995	23/02/2016	23/02/2016	Appointed as Secretary (9	PS-7) on 23:02.2016		
	Basil Ali	Muhammad Ali	29/04/1995	23/02/2016	23/02/2016	Appointed as Secretary (B	IPS-7) on 23,02,2016	î	
_	Sejjad Ali	Syed Hussain	15/01/1996	23/02/2016	23/02/2016	Appointed as Secretary (5	PS-7) on 23.02.2016	1.1	
125		Sheikh Muhammad Yousaf	20/02/1996	23/02/2016	23/02/2016	Appointed as Secretary (8	PS-7) on 23.02.2016		
_	Wajid Ali	Ali Haider	10/02/1987	02/05/2016	02/05/2016	Appointed as Secretary (B	PS-7) on 02.05.2016		
	Zakir Khan Bacha	Muhammad Umar Khan	13/02/1990	20/05/2016	20/05/2016	Appointed as Secretary (B	PS-7) on 20.05.2016		
_	Muhammed Anas	Mukhtiar Hussain	04/02/1991	20/05/2016	20/05/2016	Appointed as Secretary (B	PS-7) on 20,05,2016	G	
	Knaista Rahman	Multan	02/03/1991	20/05/2016	20/05/2015	Appointed as Secretary (8	PS-7) on 20.05.2016	77	
	Muhammad Ali	Taj Wali Shah	31/03/1991	20/05/2016	20/05/2016	Appointed as Secretary (B	PS-7) on 20.85.2016	7-1	
_	Shewkat All	Shah Pasand Khan	13/04/1991	20/05/2016	20/05/2016	Appointed as Scoretary (B	PS-7) on 20.05 2018		
132	Fida Muhammad Khan	Səljad Ali	22/01/1992	20/05/2016	20/05/2016	Appointed as Secretary (B	PS-7) on 20.05.2016		
	Shah Faisal	Akmal Khan	01/02/1992	20/05/2016	20/05/2016	Appointed as Secretary (B	PS-7) on 20.05(2016	$\overline{}$	
	Muhammad Ubaid	Muhammad Alsar	01/04/1993	20/05/2016	20/05/2016	Appointed as Secretary (Bi	PS-7) on 20.05.2016		
	Jamil Khan	Muhammad Khan	10/02/1994	20/05/2016	20/05/2016	Appointed as Secretary (BI	PS-7) on 20.05.2016	;-	
	Liaget Shah	Sarfaraz Khan	05/11/1994	20/05/2016	20/05/2016	Appointed as Secretary (BI	PS-7) or/20.05.2016	1	
	Noman Jamai	Jamal Abdul Nasir	01/08/1995	20/05/2016	20/05/2016	Appointed as Secretary (BI	PS-7) of 20.05.2016	<u> </u>	
	Zia Ul Hag Adil	Amin Ul Haq	30/03/1991	23/05/2016	23/05/2016	Appointed as Secretary (Bi	PS-7) on 23.05.2016	·····	
	Taqweem Ul Haq	Anwar Ul Haq	23/05/1993	15/09/2017	15/09/2017	Appointed as Secretary (B)	PS-7) on 15.09.2017		
_	Asad Ali	Feroz Shah	17/01/1990	25/09/2017	25/09/2017	Appointed as Secretary (Bi	PS-7) on 25.09.2017	{	
141	Jehangir Shah	Maroof Shah	05/01/1989	23/02/2018	23/02/2018	Appointed as Secretary (Bi	PS-9) on 23.02.2018		
142	TaimGor Ali Shah	Inayat Ali Shah	02/05/1998	30/11/2018	30/11/2018	Appointed as Secretary (BI	25-91 on 30.11.2018		
143						Promoted to Secretary (BP	S-9) on 30.04.2019		
	Mohib Ullah	Hamish Gul	15/03/1971	02/06/1990	30/04/2019	Appointed as Naib Qasid (E	JPS-1) on 02.06.1990	1	
144	}					Promoted to Secretary (BP	5-91 on 30 04 2019	— – – – –	

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		Fin	al Seniority List o	of Junior Secretari	es (BPS-not	
S.No N	ame	Father Name	Date of Birth	Appointment Date	Current Post	Remarks
1		1			and cher use	Promoted to Secretary (BPS-9) on 30.04.2019
145	- B - 14					Adjusted as Naib Qasid (BPS-1) on 12.12,2001
<u> </u>	I Rəj Khan	Shamshad Khan	12/04/1973	16/03/1994	30/04/2019	Appointed as Chowkidar (Temp) on 16 03 1994
146	W					Promoted to Secretary (BPS-9) on 30.04.2019
	kir Muhammad	Jamshid Muhammad	27/02/1969	18/05/1994	30/04/2019	Appointed as Chowkidar (BPS-1) on 18.05,1994
147					5.7	Promoted to Secretary (BPS-9) on 30.04,2019
1 1	ihammad Salim					Adjusted as Naib Qasid (BPS-1) on 14.05.2003
	A CONTRACT OF	Muhammad Rahim	12/07/1971	01/01/1995	30/04/2019	Appointed as Lab Attendent (Temp) on 01 01 19
148 Mu	hammad Zaman	Muhammad Aslam				Promoted to Secretary (BPS-9) on 30.04 2019
			04/02/1983	20/10/2005	30/04/2019	Appointed as Naib Qasid (8PS-1) on 20.10.2005
149 Ba	shir Muhammad	Dilawar Khan	20/04/1077			Promoted to Secretary (BES-9) on 30.04 2019
150	· · · · · · · · · · · · · · · · · · ·		20/04/1977	22/04/2013	30/04/2019	Appointed as Naib Qasid (BPS-1) on 22:04:2013
130 Un	ar Farooq	Saif Ur Rehman	11/02/1992	17/04/1010		Promoted to Secretary (BPS-9) on 30.04-2019
151			21/02/1332	22/04/2013	30/04/2019	Appointed as Naib Qasid (BPS-1) on 22.04,2013
Mu	hammad Mustafa	Miraj Muhammad	02/10/1977	03/04/2015	30/04/2010	Promoted to Secretary (BPS-9) on 30.04.2019
152				05/07/2025	30/04/2013//	Appointed as Naib Qasid (BPS-3) on 03.04.2015
	ni Uilah	Aman Ullah Khan	11/05/1979	03/04/2015	30/04/2019/	romoted to Secretary (BPS-9) on 30.04 2019 Appointed as Naib Qasid (BPS-3) on 03:04 2015
	had Ali	Raham Sala Khan	03/02/1985	05/07/2019	05/07/2019	Appointed as Naid Clasid (BPS-3) on 03:04,2015 Appointed as Secretary (BPS-9) on 05:07,2019
	sham	Noor Ul Hag	20/08/1987	05/07/2019	05/07/2019	oppointed as Secretary (BPS-9) on 05:07,2019
	Muhammad	Shams Ul Qamar	15/01/1989	05/07/2019	05/07/2019	ppointed as Secretary (BPS-9) on 05.07,2019
156 [Mu] 157 [Sai:	iammad Imran	Muhammad Parvez	03/03/1990	05/07/2019	05/07/2019 A	ppointed as Secretary (BPS-9) on 05.07,2019
	hat Uilah	Aman Ullah Khan	05/03/1992	05/07/2019	05/07/2019 A	ppointed as Secretary (BPS-9) on 05.07.2019
	ul Naeem Khan	Jala Ud Din	09/03/1992	05/07/2019	05/07/2019 A	ppointed as Secretary (BPS-9) on 05.07.2019
160 Nun		Abdul Qayum Khan	03/04/1993	05/07/2019	05/07/2019 A	ppointed as Secretary (BPS-9) on 05.07.2019
The second s	han Ali	Ghulam Rasoci	25/04/1993	05/07/2019	05/07/2019JA	ppointed as Secretary (BPS-9) on 05.07.2019
and the second se	al Muhammad	Ehsan Ali Gul Nabi	01/09/1993	05/07/2019	05/07/2019 A	ppointed as Secretary (BPS-9) on 05.07.2019
	ad Ali	Murad Ali	05/03/1994	05/07/2019	05/07/2019 A	ppointed as Secretary (8PS-9) on 05.07 2019
	ir Khan	Siraj Ur Rehman	06/02/1995	05/07/2019	05/07/2019 A	ppointed as Secretary (8PS-9) on 05.07 2019
	ammad Taimoor Khan	Gul Bahadar	07/04/1995	05/07/2019	05/07/2019 A	pointed as Secretary (BPS-9) on 05.07.2019
66 Muh	ammad Abbas Khan	Zutfigar Ali	17/06/1999	05/07/2019	05/07/2019 A	opointed as Secretary (BPS-9) on 05 07 2019
167 Sada	am Hussein	Rahim Gul	02/02/2000	22/07/2019	22/07/2019 A	pointed as Secretary (8PS-9) on 22.07.2019
.68 Zaho	or Khan	Hukam Khan	02/03/1995	26/07/2019	26/07/2019 Ap	pointed as Secretary (BPS-9) on 26.07 2019
69 Zees	han Ahmad	Zahir Shah	10/09/1994	15/04/2020	15/04/2020 Ap	ppointed as Secretary (BPS-9) on 15.04.2020 pointed as Secretary (BPS-9) on 18.05.2020

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<u>s</u> .	No Name	Father Name	nal Seniority List of	Junior Secretar	ies (BPS-09)	
11	71		Date of Birth	pointment Date	Current Post	Remarks
	Adnan Khan	Fazil Rehman	29/03/1993	12/12/2017		Promoted to Seconter topo a
Ľ	72 Shehryar Khan	Nihar Muhammad	18/04/1992			Promoted to Secretary January 10, 12, 12, 2017
17	73 Iffikhar			19/12/2017		OPPOINTED BS Nath Origination and a second second
17	4	Shamshad Khan	05/02/1979	21/12/2017		Promoted to Secretary (BPS-9) on 05.06.2020 Appointed as Naib Qasid (BPS-3) on 21.12,2017
17	lbad Ullah	Abid Ullah	04/04/1997	21/12/2017		I WITIULED TO SOCIETARY TODA OF SAME
	Muhammad Tufail	Ghani Ratiman	07/05/1998			Promoted to Secretary (BPS-3) on 21.12.2017
176	5 Waseem Uliah	Fazal Wahab		22/12/2017		Promoted to Secretary (BPS-3) on 22:12:2017
177	Mutammad Ilyas		06/10/1992	26/12/2017		PPOINteg as Naih Dasid (and a) a seasais set
178		Muhammad lqbal	01/04/1996	26/12/2017	05/06/2020 A	ppointed as Naib Oasta (BPS 9) on 05:06 2020
179	Mushtag Ahmad	Muhammad Aziz	01/04/1994	4 01/01/2018		
	Kamran Khan	Hazrat Hassan	02/02/1977		Pr	amoted to Security (BPS-3) on 01 01.2018
180	Səjjad Ali	Muhammad Gul		28/02/2018		Photocology as Naid Oasid (Abc. 3) on an open-
81	Shoaib Khan		01/01/1983	28/02/2018		omoted to Secretary (BPS-9) on 05.06.2010 ppointed as Naib Qasid (BPS-9) on 28.02.2018
87		Shah Pasand Khan	07/03/1986			printed to Secretary (BPS-9) on OS.05, 2020
	Mansoor Khan Ayaz Ur Rehman	Amir Zada	11/11/1993			
	Pir Hamza Sohail	Fayaz Ur Rehman	28/02/1999			PUBLIED AS NACH Charles (The N
		Muhammad Sohaii	24/03/2002			pointed to Secretary (BPS-9) on 05:06:2020 pointed as Secretary (BPS-9) on 05:06:2020

Assistant Director Local Govt & RDD Mardan

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

Dated MRD/Establ- 8/10/2021

OFFICE ORDER:

No./AD/LG&RDD/MRD/ESTAB/Promotion/2021:²³⁷Consequent 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:

i.Noļi	Name	Father Name I	Date of Birth A	ppointment	Remarks
l			l I)ate	
	Jamal Alunad	Riaz Ahmad	13/04/1990	24/12/2011	Promoted from BPS-09 to BPS-11
	Muhammad Farooq Shah	Muhammad Zahir Shab	20/11/1976	23/02/2016	Promoted from BPS-09 to BPS-11
	Ashfaq	Nadar Khan	10/06/1981	23/02/2016	Promoted from BPS-09 to BPS-1
1	Feroz Shah	Syed Zahir Shah	02/04/1985	23/02/2016	Promoted from BPS-09 to BPS-11
5	Niaz Muhammad	Muhim Muhammad	09/11/1985	23/02/2016	Promoted from BPS-09 to BPS-11
6	Ilhsan Ullah	Nadar Khan	15/01/1986	23/02/2016	Promoted from BPS-09 to BPS-12.
7	Kumail Hamza	Adam Khan	17/02/1986	23/02/2016	Promoted from BPS-09 to BPS-11.
8	Abid Ali	Gul Zada	20/03/1986	23/02/2016	Promoted from BPS-09 to BPS-11
9	Habib Ullah	Niez Nabi	15/04/1986	23/02/2016	Promoted from BPS-09 to BPS-11
10) Syed Waqas Ali Shal	Syed Ghafar Shal	n 30/04/1986	23/02/2016	Promoted from BPS-09 to BPS-11
1	Faiz Ul Islam	Faiz Ur Rahman	19/09/1986	23/02/2016	Promoted from BPS-09 to BPS-11
E	2 Janas Khan	Khan Sher	01/01/1987	23/02/2016	Promoted from BPS-09 to BPS-1
	3 Ismail	Ahmad	02/02/1987		Promoted from BPS-09 to BPS-1
T	4 Muhammad Younas	Said Zahir Shah	06/02/1987	23/02/2016	Promoted from BIS-09 to BPS-1
h	5 Asad Ali	Ali Rahman	11/02/1987	23/02/2016	l
	6 Taimur Khan	Abdul Sattar	01/03/1987	23/02/2016	
	7 Yasir Khan	Sher Zamin	02/03/198	7 23/02/2016	Promoted from BPS-09 to BPS-
	18 Sajjad Khan	Abdur Rahman	20/04/198	7 23/02/2010	
	19 Khalid Khan	Nowsher Khan	12/07/198	7 23/02/2010	
	20 Umar Hayat	Nadir Khen	31/10/198	17 23/02/201	
$\left \right $	21 Shafi Ullah	Atta Ullah	20/12/198	37 23/02/201	
-	22 Amir Zeb	Alam Zeb	25/12/19	87 23/02/201	6 Promoted from BPS-09 to BPS

			المه م						
23	Ajmal Khan	Umer Khan	02/01/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
24	Shah Fahad	Gul Rehman	01/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
25	Muhammad Shafiq	Mir Zaman	10/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
26	Riaz Ali Shah	Qadeem Shah	18/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
27	Zahoor Muhammad	Fazal Muhammad	31/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
28	Sadiq Ur Rehman	Raj Muhammad	01/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
29	Hussain Muhammad Irshad	Zahir Shah	06/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
30	Sajid Ali Jan	Allah Bakhsh	12/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11				
31	Ali Shah	Maqsood Gul	05/01/1989	23/02/2016	Promoted from BPS-09 to BPS-11				

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

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

· · · · ·	<u></u>	Senio	ority List of J	unior Secretaries	(BPS-09)	- All residents
£ 31-	Name				Qualification	Remarks
	Imtiaz Ali	Aziz Ullah	1/10/1989	2/23/2016	-	Appointed as Secretary (BPS-7) on 23.02.2016
		Momin Khan	1/13/1989	2/23/2016	BA '	Appointed as Secretary (BPS-7) on 23.02:2016
	Sabir Khan Muhammad Salman	Hussain Khan	1/24/1989		MA-Islaniat	Appointed as Secretary (BPS-7) on 29.02.2016
		Deedan Gul	2/13/1989	2/23/2016		Appointed as Secretary (BP5-7) on 23.02.2016
4	Liagat Ali	Amir Wahab	3/3/1989	2/23/2016	B.Tech	Appointed as Secretary (BPS-7) on 23.02 2016
	Muhammad Sajjad	Ghafoor Rahman	3/5/1989	2/23/2016		Appointed as Secretary (BP5-7) on 23.02.2016
. 6	Tahir Rahman		3/25/1989	2/23/2016		Appointed as Secretary (BP5-7) on 23.02.2016
7	Numan Khan	Fazal Mir Muhammad Ghawas	3/27/1989	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
8	Muhammad Arif		4/6/1989		····	Appointed as Secretary (BPS-7) on 23,02.2016
<u>9</u>	Aman Khan	Waheed Ullah	12 Au 15 51 1 10 1	-1.		Appointed as Secretary (BPS-7) on 23.02.2016
10	Naik Wali	Sher Wali Khan	4/10/1989	2/23/2016	B.Sc	Leave without Pay since 03.11.2021 (6 Months):
	and the second		4/12/1989	2/23/2016	<u> </u>	Appointed as Secretary (BPS-7) on 23.02.2016
11	lmran Khan	Alam Zeb	4/15/1989			Appointed as Secretary (BPS-7) on 23.02.2016
12	Ubaid Ur Rahman	Saif Ur Rahman	4/13/1989		the second s	Appointed as Secretary (BPS-7) on 23.02.2016
13	Asif Khushal	Khushal Khan	4/25/1989			Appointed as Secretary (BPS-7) on 23.02.2015
14	Waseem Shah	Nadar Shah	12/12/1989			Appointed as Secretary (BPS-7) on 23.02.2016
15	Muhammad Imran	Said Ahmad Jan	1/6/1990	the second se		Appointed as Secretary (BPS-7) on 23.02,2016
16	Riaz Ali	Muhammad Tahir	2/5/1990			Appointed as Secretary (BPS-7) on 23.02.2015
17	Sajid Khan	Syed Zaman	2/3/1990			Appointed as Secretary (BPS-7) on 23.02.2016
18	Tahir Hussain	Akbar Hussain	3/1/1990			Appointed as Secretary (BPS-7) on 23.02.2015
19	Gul Taj	Zahir Taj	and the second se			Appointed as Secretary (BPS-7) on 23.02.2016
20	Muhammad Asad Zia	Farman	3/5/1990			Appointed as Secretary (BPS-7) on 23.02.2016
21	Ihsan Uddin	Burhan Ud Din	3/15/1990			Appointed as Secretary (BPS-7) on 23.02.2016
22	Hamad Ali	Niaz Ali	3/20/1990			Appointed as Secretary (BFS-7) on 23.02.2016
23	Sajjad Afzal	Afzal Khan	4/1/1990	·		Appointed as Secretary (BP5-7) on 23.02.2016
24	Farhad All	Liagat Ali	4/3/1990	·		Appointed as Secretary (BPS-7) on 23.02.2016
25	Muhammad Asghar Khan	Gul Rosh	4/12/1990	and the second sec		Appointed as Secretary (BPS-7) on 23.02.2016
26	Tariq Shah	Syed Wali Shah	6/22/1990			Appointed as Secretary (BPS-7) on 23.02.2016
27	Infan Khan	Fazli Qadar	8/28/1990			Appointed as Secretary (BPS-7) on 23.02.2016
28	Syed Bilawal Hussain	Syed Bashir Hussain	9/25/1990			Appointed as Secretary (BPS-7) on 23.02.2016
29	Ali Raza	Nisar Muhammad	12/15/1990			Appointed as Secretary (BP5-7) on 23.02.2016
30	Jafar Khan	Gul Rehman	1/7/199			Appointed as Secretary (8PS-7) on 23.02.2016
31	Nasir Klian	Mehraban Shah	1/21/199			Appointed as Secretary (BPS-7) on 23 07, 2016
32	Junaid Ur Rehman	Kifayat Ullah	2/1/199		6 MA	Appointed as Secretary (BPS-7) on 23.02.2016

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<u> </u>		./ Sen		lunior Secretaries		
5.No	Namo	Father Name			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, S c	Appointed as Secretary (BPS-7) on 23.02.2016
36	Salman Akhtar	Amir Ud Din	3/16/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
37	Zakir Khan	Taza Gul	3/17/1991	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
38	Arshad Ali	Jan Syed	3/17/1991	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016
39	Inavat Ur Rahman	Bakht Zada	3/30/1991	2/23/2016	MA	Appointed as Secretary (BPS-7) on 23.02.2016
40	Muhammad Asif	Ghulam Hussaln	3/31/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2015
41	Alta Ur Rahman	Meher Gul	4/3/1991	2/23/2016	MA-Islamiat	Appointed as Secretary (8PS-7) on 23.02.2016
42	Muhàmmad Arif	Fakhruz Zaman	4/4/1991	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2016
43	Hamair Ali	Gul Sher	4/4/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
44	Muhammad Ibrahim	Tilawat Khan	4/5/1991	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
45	Muhammad Sagib Khan	Raheem Khan	4/15/1991	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 Amjid Ali Shah	Syed Jamal 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	8.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			Appointed as Secretary (BPS-7) on 23.02.2016
51	Muhammad Abbas	Zahid Gul	1/10/1992			Appointed as Secretary (BPS-7) on 23.02.2016
52	Muhammad Yaqub	Muhammad Ibrahim	1/12/1992			Appointed as Secretary (BPS-7) on 23.02.2016
53	Bilal Khan	Akmal Khan	1/17/1992	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	Wagas Khan	Sheryar	3/7/1997			Appointed as Secretary (BPS-7) on 23.02.2016
	Imad Naeem	Fazli Naeem	3/10/1992			Appointed as Secretary (BPS-7) on 23.02.2016
57	Adil Khan	Bashir Ahmad Khan	3/15/1992	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
58	Fawad Ali	Imtiaz Khan	1, 3/17/1992			Appointed as Secretary (BPS-7) on 23.02.2016
59	Mubassar Shah	Fazle Malik	3/18/1992			Appointed as Secretary (BPS-7) on 23.02.2016
60	Muhammad Zeb	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			Appainted as Secretary (BPS-7) on 23.02.2016
62	Muhammad Zeib	Falz Muhammad	4/8/1992	2/23/2016	88A	Appointed as Secretary (BPS-7) on 23.02.2016
63	Imran Khan	Hussaln Muhammad	. 4/10/1997			Appointed as Secretary (BPS-7) on 23.02.2016
64	Hazrat Umar	Khan Bahadar	4/11/1992			Appointed as Secretary (8PS+7) on 23.02.2016
65	Anwar Ali	Sabz All	4/15/199	2/23/2016	BA .	Appointed as Secrétary (BPS-7) on 23.02.2016
66	Waqas Khan	Riaz Khan	4/21/1992	2/23/2016	B.Sc	Appointed as Secretary (BPS-7) on 23.02.2010

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	·			Local Gov	and RDD Marda	n	
			Coolo		infor Secretaries		a tradition and the second
	·	•		THEY LISE OF T	Appointment Date	Qualification	Remarks
	S.No I			5/30/1992	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016 .
	68		Mumtaz Khan	8/5/1992	2/23/2016	MA-Islamlat	Appointed as Secretary (BPS-7) on 23.02.2016
	69 1		Kifayat Ullah	1/15/1993	2/23/2016		Appointed as Secretary (8P5-7) on 23.02.2016
	70		Alam Zeb Khan		2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2015
	71		Wazir Gul	3/3/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02,2016
	72		Pir Muhammad	3/13/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	73		Umar Sher	3/15/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
•	74		Muhammad Shah	3/20/1993 4/6/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	75		Darwish Khan		2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
1 N	76		Muhammad Yar	5/4/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
·	77	Abdul Haseeb	Həzrat Umar	5/4/1993 5/5/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	78	Muhammad Islam	Anwar Zeb	9/5/1993	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
h.	79	Mubassir Kilan	Bakht Taj	4/8/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
1	80	Shahan Khan Naqi	Muhammad Nagi	4/8/1334	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
•	81	Muhammad Zeeshan	Lai Mir	4/20/1354 0/20/2354	P. A.S. S.	18 -1- 01 - 10 ¹²	Adpointed as Secretary (BPS-7) on 23:02:2016 (19) and
	s said				- 43 - 2/23/2016	V LABOR	Leave withold Pay since 22:11:2019
	¥ 82	Syed Sail Ullan	Syed Ahmad Hussain Shah			2.53 2.65	LEave without Payentended on 24.06.2020 (2-Years) : 7
	1.20	4		5/1/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	83	Muhammad Sahlb	Namoos Khan	5/2/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
\sim	84	Naseer Khan	Jafar Khan	5/10/1994	2/23/2016		Appointed as Secretary (BPS-7) on 23.02.2016
	85	Infan Ullah	Khalid Khan	B/4/1994		DAE-Electrical	Appointed as Secretary (BPS-7) on 23.02.2016
		Saml Ullah	Sher Zada	8/15/1994			Appointed as Secretary (BP5-7) on 23.02.2016
~~~		Faroog Badshah	Saleh Badshah	10/20/1994			Appointed as Secretary (BPS-7) on 23.02.2016
		Ishfaq All	Muhammad Irshad	2/2/1995			Appointed as Secretary (BPS-7) on 23.02.2016
		Hassan Nasir	Sabir Ali	2/2/1995			Appointed as Secretary (BPS-7) on 23.02.2016
	90	Akbar Ali	Abdul Samad	3/16/1995			Appointed as Secretary (BPS-7) on 23.02.2016
	91	Fawad Ahmad	Niaz Muhammad	4/1/1995		DAE-CIVII	Appointed as Secretary (BPS-7) on 23.02.2016
		Noman Sadiq	Noor Badshah	4/29/1995		SHSSC	Appointed as Secretary (BPS-7) on 23.02.2016
		Basil Ali	Muhammad All	1/15/1996			Appointed as Secretary (BPS-7) on 23.02.2016
		Sajjad Ali	Syed Hussain	2/20/1996			Appointed as Secretary (BPS-7) on 23.02.2016
	95	Muhammad Waqas	Sheikh Muhammad Yousaf	2/10/1997			Appointed as Secretary (BPS-7) on 02.05.2016
		Wajid Ali	Ali Halder	2/13/1990			Appointed as Secretary (BPS-7) on 20.05:2016
	97		Muhammad Umar Khan	2/13/1350		MBA Finance	Appointed as Secretary (BP5-7) on 20.05:2016
-	98	Muhammad Anas	Mukhtlar Hussaln	3/2/1993		6 MA-Urdu	Appointed as Secretary (BP5-7) on 20.05.2016
• .		Khaista Rahman	Multan				and the second

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		Ci	minrity list of l	rt and RDD Marda Junior Secretaries	(BPS-09)	
	· · · · · · · · · · · · · · · · · · ·	and the second	Date of Birth	Appointment Date	Qualification	Remarks
S.No N		Father Name	3/31/1991	the second s	B.Sc	Appointed as Secretary (BPS-7) on 20.05.2016
	Auhammad Ali	Taj Wali Shah	4/13/1991			Appointed as Secretary (BPS-7) on 20.05.2016
	shawkat Ali	Shah Pasand Khan	1/22/1992			Appeinted as Secretary (BPS-7) on 20.05.2016
102 F	ida Muhammad Khan	Sajjad Ali	2/1/1992			Appointed as Secretary (BPS-7) on 20.05.2016
	3hah Faisal	Akmal Khan	2/10/1994		MA [:] Islamiat	Appointed as Secretary (BPS-7) on 20,05,2016
104 J	lamil Khan	Muhammad Khan	11/6/1994	the second s		Appointed as Secretary (BPS-7) on 20.05,2016
105 L	liagat Shah	Sarfaraz Khan	8/1/1995	and the second se	DAE-Electrical	Appointed as Secretary (BPS-7) on 20.05.2016
106	Noman Jamal	Jamal Abdul Nasir	3/30/1991		DAE-Electrical	Appointed as Secretary (BPS-7) on 23.05.2016
107 2	Zia Ut Haq Adil	Amin UI Hag	5/23/1993			Appointed as Secretary (BPS-7) on 15.09.2017
108	Tagweem Ul Hag	Anwar Ul Hag			6A	Appointed as Secretary (BPS-7) on 25.09.2017
109 /	Asad Ali	Feroz Shah	1/17/1990		MBA	Appointed as Secretary (8P5-9) on 23.02.2018
	Jehangir Shah	Maroof Shah	1/5/1989			Anopinted as Secretary (BPS-9) on 30.11.2018
	Taimbor Ali Shah	inayat Ali Shah	5/2/1998			Promoted to Secretary (BPS-9) on 30.04.2019
Ť		Hamish Gul	3/15/1971	6/2/1990	FA .	Appointed as Naib Qasid (BPS-1) on 02.05.1990
112	Mohib Ullah	Hamish Gol				Promoted to Secretary (BPS-9) on 30.04.2019
	47		4/3/1974	4 7/25/1993	SSC	Appointed as Naib Qasid (BP5-1) on 25.07.1993
113	Arshad Hussain	Faqir Hussain				Promoted to Secretary (BPS-9) on 30.04.2019
					D A	Adjusted as Naib Qasid (BPS-1) on 12,12,2001
114	Dil Raj Khan	Shamshad Khan	4/12/197	3 3/ 10/ 1994	0.M	Appointed as Chowkidar (Temp) on 16.03.1994
114					<u></u>	Promoted to Secretary (BPS-9) on 30.04.2019
			2/27/195	9 5/18/1994	ISSC	Appointed as Chowkidar (BPS-1) on 18.05.1994
1,15	Żakir Muhammad	Jamshid Muhammad			· •	Promoted to Secretary (BPS-9) on 30.04.2019
						Adjusted as Nalb Qasid (BPS-1) on 14.05.2003
	Muhammad Salim	Muhammad Rahim	7/12/197	1 1/1/1995		Appointed as Lab Attendent (Temp) on 01.01.1995
170	Munammac Samo					Promoted to Secretary (BPS-9) on 30.04.2019
			2/4/198	10/20/200	5 SSC	Appointed as Naib Qasid (BPS-1) on 20.10.2005
117	Muhammad Zaman	Muhammad Aslam	2/4/150	······		Promoted to Secretary (BP5-9) on 30.04.2019
	<u> </u>		4/20/197	4/22/201	3	Appointed as Naib Qasid (BPS-1) on 22.04.2013
118	Bashir Muhammad	Dilawar Khan	4/20/15/	·····		Promoted to Secretary (BPS-9) on 30.04.2019
1				4/22/201	3	Appointed as Naib 'Qasid' (BP5-1) on 22.04.2013
119	Umar Farooq	Saif Ur Rehman	2/11/19			Appointed as Naib Gasia (BFS-1) on 20.04.2019 / Promoted to Secretary (BPS-9) on 30.04.2019
				77 4/3/201	5	Appointed to Secretary (BF3-3) on 03.04.2015
· ·	Muhammad Mustafa	Miraj Muhammad	10/2/19	11	· · · · · · · · · · · · · · · · · · ·	Promoted to Secretary (BPS-9) on 30.04.2019

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			Local Govt a	nd RDD Marda	(805-09)	
			Seniority List of Jur	Hor Secretaries	Qualification	Remarks
No	Name	Father Name	Date of Birth A	pointment Date 7/5/2019		Appointed as Secretary (8PS-9) on 05.07.2019
	Fartiad All	Raham Sala Khan	2/3/1985			Appointed as Secretary (BPS-9) on 05.07.2019
	Ihtishám	Noor Ul Hag	8/20/1987	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
123	Jan Muhammad	Shams Ul Qamar	1/15/1989	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
	Muhammad Imran	Muhammad Parvez	3/3/1990	7/5/2019	8.5C	Appointed as Secretary (BPS-9) on 05.07.2019
	Sejad	Aman Ullah Khan	3/5/1992	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
	Sibghat Ullah	Jalal Ud Din	3/9/1992	7/5/2019	MA	Appointed as Secretary (BPS-9) on 05.07.2019
127	Abdul Naeem Khan	Abdul Qayum Khan	4/3/1993	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
		Ghulam Rasool	4/25/1993	7/5/2019		Appointed as Secretary (BPS-9) on (5.07.2019
229	Numen	Ehsan All	9/1/1993	7/5/2019	85	Appointed as Secretary (8PS-9) of 05.07.2019.
130		Gul Nabi	3/5/1994	7/5/2019		Appointed as Secretary (8PS-9) on 05.07.2019
131	Wisal Muhammad	Murad All	2/6/1995	7/5/2019		Appointed as Secretary (BPS-9) on 05.07.2019
132	Farhad Ali	Siraj Ur Rehman	4/7/1995	7/5/2019	BCS	Appointed as Secretary (BPS-9) on 05:07:2019
133	Umair Khan	Gul Bahadar	6/17/1999		BS-Software	Appointed as Secretary (BPS-9) on 22.07.2019
134	Muhammad Taimoor Khan	Zulfigar All	2/2/2000	7/22/2019		Appointed as Secretary (arS-5) on 26.07.2019
135	Muhammad Abbas Khan	Rahim Gul	4/25/1996	7/26/2019	8S	Appointed as Secretary (BPS-9) on 15.04.2020
136		Hukam Khan	3/2/1995	4/1.5/2020		Appointed as Secretary (BPS-9) on 18.05.2020
137		Zahir Shah	9/10/1994	5/18/2020		Appointed as Secretary (BPS-9) on 18.05.2020
138		Moeen Ud Din	3/24/1995	5/18/2020	MS	Appointed as secretary (bp3-5) on 10.03.000
139	Abdul Majid	Moeen ut um	······································	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
140	Autorit	<u>• •</u> ,,		12/19/2017	i na	Promoted to Secretary (8PS-9) on 05.06.2020
141	Shehryar Khan	Nihar Muhammad	4/18/1992	12/19/2017	BA	Appointed as Naib Qasid (BPS-3) on 19.12.2017
141	Sheriyar Knon				Tra	Promoted to Secretary (BPS-9) on 05.06.2020
		Shamshad Khan	2/5/1979	12/21/2017	/ FA	Appointed as Naib Qasid (BPS-3) on 21.12.2017
142	lftikhar				1. 6-	Promoted to Secretary (BPS-9) on 05.06.2020
-		Abid Ullah	4/4/1997	12/21/201	/ F.SC	Appointed as Naib Qasid (BPS-3) on 21.12.2017
143	1 lbad Uliah					Promoted to Secretary (BPS-9) on 05.06.2020
		Ghani Rahman	5/7/1998	12/22/201	7 DAE	Appointed as Naib Qasid (BPS-3) on 22.12.2017
144	4 Muhammad Tufail					Promoted to Secretary (8PS-9) on 05.06.2020
h		Fayaz Ur Rehman	2/28/1999	12/22/201	7	Appointed as Naib Qasid (BPS-3) on 22.12.2017
14	5 Ayaz Ur Rehman	rayaz un neuroan				Promoted to Secretary (BPS-9) on 05.06.2020
		r - Luisboh	10/6/1992	12/26/201	7 550	Annointed as Naib Qasid (BPS-3) on 26.12.2017
14	6 Waseem Ullah	Fazal Wahab				Promoted to Secretary (BPS-9) on 05.06.2020
<b>—</b>	7 Muhammad Ilyas	Muhammad iqbal	4/1/1996	12/26/201	7 F.Sc	Appointed as Naib Qasid (BPS-3) on 26.12.2107

 $\sum_{\substack{i=1,\dots,n\\ i \in \mathbb{N}^{n}}} \frac{|F_{i}|^{2}}{|F_{i}|^{2}} = \frac{|F_{i}|^{2}}{|F_{i}|^{2}}$ 

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				rt and RDD Marda		
		Se	niority List of ]	unior Secretaries	(Bb2-06)	
		Father Name	Date of Birth	Appointment Date	Qualification	Remarks
	Name	Muhammad Aziz	4/1/1994	1/1/2018	ssc	Promoted to Secretary (8PS-9) on 05.06.2020 Appointed as Naib Qasid (8PS-3) on 01.01.2018
· 	Kamran Khan	Həzrat Həssən	2/2/1977	2/28/2018	SSC	Promoted to Secretary (895-9) on 05.06,2020 Appointed as Naib Qasid (895-3) on 28.02.2018
•	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-9) on 28.02,2018
	Shoaib Khan	Shah Pasand Khan	3/7/1986	2/28/2018	ssc	Promoted to Secretary (8PS-9) on 05.06.2020 Appointed as Naib Qasid (8PS-3) on 28.02.2018
	· · · · · · · · · · · · · · · · · · ·	Amir Zada	11/11/1993	2/28/2018		Promoted to Secretary (BPS-9) on 05.06,2020 Appointed as Nalb Qasid (BPS-3) on 28.02.2018
	Mansoor Khan Pir Hamza Sohail	Muhammad Sohail	3/24/2002	6/5/2020		Appointed as Secretary (BPS-9) on 05.06.2020
	Muhammad Shoaib	Muzaffar Shah	3/18/1992			Appointed as Secretary (BPS-9) on 09.03.2021 Appointed as Secretary (BPS-9) on 13.09.2020
155	Sunny Mushtaq	Mushtaq Masth	7/24/1992		BS-Psycholgy	Appointed as Secretary (BPS-9) on 13.09.2020
	Sundaish Raj	Tilak Raj Younas Masih	3/15/2002		F.Sc-Medical	Appointed as Secretary (BPS-9) on 13.09.2020
	Ayub Masih Salman Ali Khan	Mumtaz All Khan	3/27/1990	10/12/2023	· · · · · ·	Appointed as Secretary (BPS-9) on 12.10.2021

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Assistant Director Local Govt & RDD Mardan

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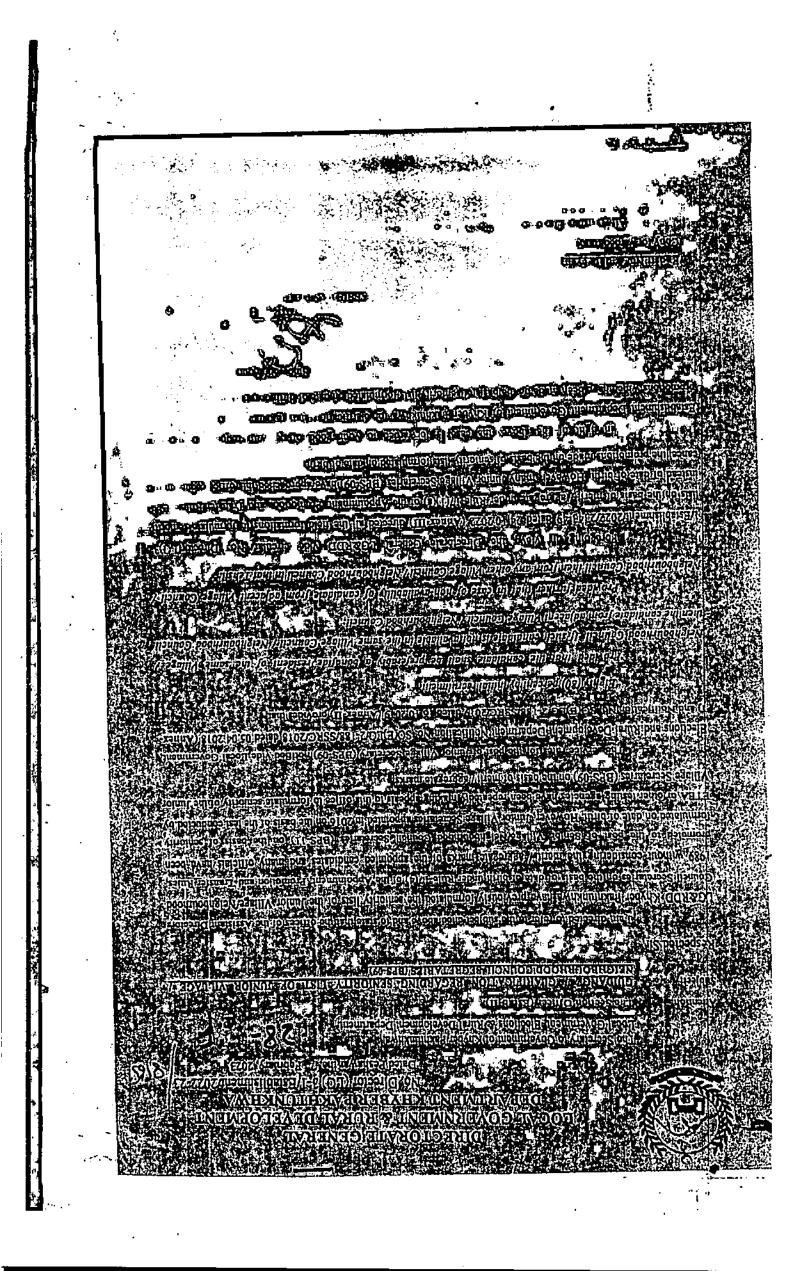
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Page No 28

DIRECTORATE GENERAL LOCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT KHYBER PAKHTUNKHWA No. Director (LG) 3-1/Establishment/2022-23/8165 Dated Peshawar the, 7 February, 2023

The Secretary to Government of Khyber pakhtunkhwa, Local Government, Election & Rural Development Department.

Attention: The Section Officer (Estab-II).

Subject: <u>GUIDANCE/ CLARIFICATION REGARDING SENIORITY LIST OF JUNIOR VILLAGE /</u> <u>NEIGHBORHOOD COUNCIL SECRETARIES (BPS-09)</u>

Respected Sir,

Better Copy

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. Sincerely Yours, (VIKASH)

(VIKASH) Assistant Director (Admin/HR) LGARDD

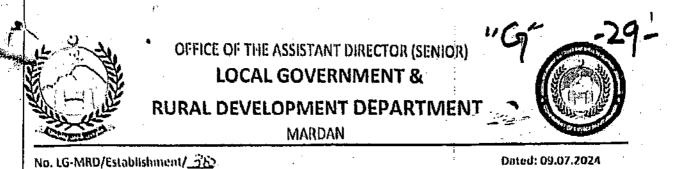
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Copy forwarded to the

1. All Assistant Directors, LGARDD, Khyber Pakhtunkhwa

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

To



OFFICE ORDER:

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

**Encl: Tentative Seniority List** 

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

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adigmardan1@gmail.com

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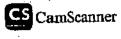
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LG&RDD Maldan

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

## VTATIVE SENIORITY LIST OF SECRETARIES YC/NC ON THE BASIS OF MERIT LIST(AGGREGATE+INTERVIEW MARKS) DISTRICT.

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14	Waqas Khan	Ríoz Khan	21/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	83	Nil
15	Naik Wali	Sher Wali Khan	10.04/1989	23/02/2016	23/02/2016 -	Appointed as Secretary (BPS-7) on 23.02.2016	82.5	Nil
16	. Numan Khan	Fazal Mir	25/03/1989	23/02/2016	/ 23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil
17	Yaseen Ahmad	Noor Muhaimmad	12/12/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil
18	Hazrat Umar	Khan Bahadar	11/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23:02:2016	82	Nil
19	Anwu Ali	Sabz Ali	15/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	82	Nil
20	Inayat Ur Rahman	Bakht Zada	30/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) an 23.02.2016	81.5	Nil
21	Waqas Khan	Sheryar	07/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81.5	Nil
<u>22</u>	Muhammad Zeb	Rahim Gui	23/03/1992	25/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81.5	Nil
23	Muhammad Sajjad	Amir Wahab	03/03/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81	Nil
24	Hamair Ali	Gul Sher	04/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	81	Nil
25	Imran Khan	Hussain Muhammad	10/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80.5	Nil
26	Gul Wahab	Muhammad Yar	04/05/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80.5	Nil
27	Bilal Khan	Akmal Khan	17/01/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	80	Nil
28	Muhammad Zeeshan	Lal Mir	20/04/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	` <b>8</b> 0	Nil
29	Muhammad Ibrahim	Tilawat Khan	05/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	79.5	Nil
30	Habib Ullah	Kifayaı Ullah	05/08/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	• 79	Nil
			00/00 (10/000	07/02/0016		American Sectors (BDS 7)	70	Mil

03/03/1993

Wazir Gul

23/02/2016

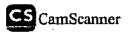
~23/02/2016

Appointed as Secretary (BPS-7) on 23.02.2016 11

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Nil

Musawit Khan

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32	Nasir Khan	Mehraban Shah	21/01/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23/02/2016	78_5	Niţ
33	Tariq Skah	Syed Wali Shah	22/06/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	78	NU
34	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
35	Salman Akhtar	Amir Ud Din	16/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	77	Nil
36	Abdullah Shah	Muhammad Shah	20/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	77	Nil
37	Asif Khushal	Khushal Khan	22/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	-76	Nil
38	Sami Ullah	Sher Zada	04/08/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	76	ы III
39	Aua Ur Rahman	Mcher Gul	03/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Nil
40	Adil Khan	Bashir Ahmad Khan	15/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Nil
41	(bad Ullah	Darwish Khan	06/04/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Nil
42	∧kbar ∧li	Abdul Samad	02/02/1995	23/02/2016	. 23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	Nil
43	Nascer Khan	Jafar Khan	02/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) m 23.02.2016	75	Nil
44	Farooq Badshah	Salch Badshab	15/08/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	75	Nil
45	Muhammad Saqib	Raheem Khan	15/04/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5	Nil
46	Khan Muhammad Adil	Abdul Qadir	25/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5	Nil
47	Muhammad Salman		24/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nil
~	Aman Khan	Waheed Ullah	06/04/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	74	Nil
48	Muhammad Asad	Farman	05/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7)	74	Nil
- 49	Muhammad Asso Zia			<u> </u>		on 23.02.2016	·	<u></u> t

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						Annatated - Commenter on L	74	- Nil
50	Parhad Ali	Lingst Ali	03/04/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016		
51	Nuhammad 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
51	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	Nii
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	Nii
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	23/02/2015	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
61	Muhammad Zaib	Fniz Muhammad	08/04/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
62	Abdul Haseeb	Hazrat Umar	04/05/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72.5	Nil
63	Arshad Ali	Jan Syed	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72	Nil
64	Salman Ullah	Pir Muhammad	13/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72	Nil
65	lshfaq Ali	Muhammad Irshad	20/10/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	72	lin
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) on 23.02.2016	71.5	Nil
	Shah	_ <u></u>						10 Devel

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65	Zahid Hussain	Gul Zada	09/02/1991	23/02/2016	23/02/2016	Apppinted as Secretary (BPS-7) on 23.02.2016	71	Nil
69	Zakir Khan	Taza Gul	17/03/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nil
70	Haider Sher	Umar Sher	15/03/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	71	Nil
71	Mubammad Sahib	Nameos Khan	01/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-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	Nil
74	Mohsin Khan	Hassan Khan	01/08/1991	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70	Nil
75	Bilal Khan	Alam Zeb Khan	15/01/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	70	Nil
76	Muhammad Islam	Anwar Zeb	05/05/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	68.5	Nil
77	Gul Taj	Zahir Taj	01/03/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	67	Nil
78	lmtiaz 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
<u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u><u></u></u>	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	Sojjad Ali	Syed Hussain	:15/01/199(6	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	Nil
84	Amin Ul Haq	Mumtaz Khan	30/05/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	63,5	Nil
85	Mubassir Khan	Bakht Taj	05/09/1993	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) 3h 23.02.2016	63.5	NNI A
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1	S6	Irfan Ullah	Khalid Khan	10/05/1994	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	62	Ņil
	57	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
	58	Sajid Khan	Syed Zaman	05/02/1990	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	61.5	Nil
	89	Imad Naeem	Fazli Nacem	10/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	61	Nil
	<b>90</b>	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	Sabîr Khan	Momin Khan	13/01/1989	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	60	Nil
~	92	Fawad Ahmad	Niaz Muhammad	16/03/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	57	Nil
	93	Hassan Nasir	Sabir Ali	02/02/1995	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	54.5	Nil
	94	Fawad Ali	lmtiaz Kinan	17/03/1992	23/02/2016	23/02/2016	Appointed as Secretary (BPS-7) on 23.02.2016	49	Nił

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

#### Respected Sirt

Facts in Brief:

The objectors humbly submit as under;

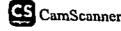
1. That, the objectors are servants and performing their duties honestly, devotedly and faithfully since their initial appointments on 23/02/2016 as junior secretaries' village and neighborhood councils in their respective VC/NCs.

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-I")

3. That, the objectors being aggrieved from above mentioned Office Order No. Office Order bearing No. LG-MRD/Establishment/3832, Dated: 09/07/2024 (Tentative Sentority 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 Paklitukhwa have no other adequate relief but to approach before your good self for their redressal on the strength of following 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/ESTAII/Promotion/2021/237, Dated 08/11/2021 about 30 persons were promoted on the basis of Rule 17 (4) in accordance to seniority by older age and the objectors were left on top of the list. Therefore, impugned list is against the law and rules and liable to be set aside.

#### (Copies of Office Order Dated: 08/11/2021 and both lists are hereby attached as Annexure "B", "C" & "C-I")

- B. That, impugned order dated: 09/07/2024 is upshot of misconstruing 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 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 Kluyber 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.

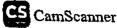
(Copy of the notification Dated: 28/02/2018 is hereby attached as Annexure "D")

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 natification 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 objectors on the score of age wise seniority as envisaged under section 17 (4) of the ibid rules. For reference of your good self, Application No. SO(Primary-M)E&SED/4-7/Seniority of PST under Court Act, 2017/Court Case/2024, Dated: 26/06/2024 in pursuance of Letter No. 3656(AD Lit-II), Dated: 09/01/2024, responded by Law, Parliamentary

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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 inw. 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 (C.S) Note 112 and 2010 SCMR 1301 are hereby attached as Annexare "II" and "J")

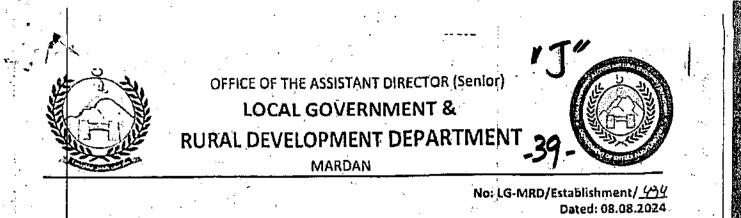
It is therefore most humbly submitted that while, considering facts and circumstances of the instant objection/appeal, impugned Office Order Dated: 09/07/2024 followed by tentative seniority list of the even date may kindly be recalled/withdrawn and old seniority list updated in the year 2021 may kindly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

S.No.	Name	G. Name	D.O.B	Signature
L	Imtiaz Ali	Aziz Wah	10/01/1989	T
2.	Sabir Khan	Momia Khaz	13/01/1989	Eme -
3.	Muhammad Sajjad	Amir Wahab	03/03/1989	BAT
4.	Tabir Rahman	Ghafoor Rahman	05/03/1989	CON
5.	Muhammad Arif	Mubammad Ghawas	27/03/1989	Chil
6.	Riaz Ali	Mukammad Takir	06/01/1990	COT
7.	Hassan Nasir	Sabir Ali	02/02/1995	dist.
	Syed Amjid Ali Shah	Syed Jamai Shah	15/08/1991	Ill

Dated: 22-07- 2024

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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, Katiang, Rustam & Garhi-Kapoora.
- 3. Supervisor, Tehsll Mardan, Takht-Bhai, Katlang, Rustam & Garhl-Kapoora.
- 4. Office Assistant, LG&RDD Mardan.
- 5. All Secretaries VC/NC District Mardan.

Assistant Director Local Govt & RDD Ma dan

#### 0937 9230067

adigmardan1@gmall.com

• •	FINAL SENIORITY	JIST OF SECRETARIE	S VC/NC ON THE BA	SIS OF MERIT LIS	TIAGGREGA	TE+INTERVIEW MARKS) DISTRICT MARDAN	<u>,</u>
S.No	Name	Father Name	Date of Hirth	Appointment Date	Current Post	Remarks	Ma
	Muhammad Arif	Fakhr uz Zaman	04.04 1991	, 23.02.2016	23:02.2016	Appainted as Secretary (BIS-7) on 23.02.2016	8
	Lizgat Ali	Deedan Gul	13.02 1989	23.02.2016	23.02.2016	Appointed is Secretary (BPS-7) on 23.02.2016	
	tljsan Uddin	Burkan Ud Din	15.03.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
	Waseem Shah	Nadar Shah	25.04.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
5	Jafar Khan	Gul Reliman	07.01.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	84
6	Tahir Hussain	Akbar Hussain	11.02.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	
7	Umran Khan	Alam Zeb	12.04.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	-8
	Muhammad Asghar Khan	Gul Rosh	12.04.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
	Shahan Khan Naqi	Muhammad Nagi	08.04.1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	- 83
10	Hamad Ali	Niaz Ali	20.03.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
<u></u>	Sajjad Afzal	Afzal Khan	01.04.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
12	Muhammad Abbas	Zahid Gul	10.01.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
13	Asif Ali Shah	Sehat Shah	16.02.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
14	Wagas Khan	Riaz Khan	21.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	18
15	Naik Wali	Shet Wali Khan	10,04.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02:2016	. 82
16	Numan Khan	Fazal Mir	25.03.1.989	23.02.2016	23.02.2016	Appointed as Sectetary (BPS-7) on 23.02.2016	8
17	Ubaid Ur Rahman	Saif ur Rahman .	15.04.1989 -	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
18	Yascen Ahmad	Noor Muhammad	12.12.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
19	Hazrat Umar	Khan Bahadar	11.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	
20	Anwar Ali	Sabz Ali	15.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	1.8
21	Inayat Ur Rahman	Bakht Zada	30.03.1991	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	81
22	Wagas Khan	Sheryar	07.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	81
23	Muhammad Zeb	Rahim Gul	23.03.1992	23.02.2016	23.02.2016	Appointed as Sectetary (BPS-7) on 23.02.2016	<u></u> BI
24	Muhammad Sajjad	Amir Wahab	03.03.1989	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	8
25	Hamair Ali	Gul Sher	04.04.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	8
26	Imran Khaa	Hussain Muhammad	10.04.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23,02.2016	80
27	Gui Wahab	Muhammad Yar	04.05.1993	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	80
28	Bilal Khan	Akmal Khan	17.01.1992	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	8
29	Muhammad Zeeshan	Lal Mir	20.04.1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016 Appointed as Secretary (BPS-7) on 23.02.2016	- 8

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1	 L.	1		· .			1	79	·
11			Kilayat Ullah	05.08.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	79	•
- f - [			Wazir Gul	03.03.1993	23.07.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	78.5	۰.
A I	33	Nasir Khan	Mehrahan Shah	21.01.1991	23,02,2016		Appointed as Secretary (BPS-7) on 23.02.2016	78	
f	. 34 -	Tatiq Shah	Syed Wali Shah	22.06.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	77.5	
	35	Basin Ali	Muhammad Ali	- 29,04,1995	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	$\frac{n.s}{n}$	
	36	Salman Akhtar	Amir Ud Din	16.03:1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016		the second
	37	Abdullah Shah	Muhammad Shah	20.03.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	76	
•	38	Asif Khushal	Khusha) Khan	22.04.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016		4
	39	Sami Ullab	Sher Zada	04.08.1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	76	
• .		Ana Ur Rahman	Meher Gul	03.04:1991	23.02.2016	23.02.2016	Appointed is Secretary (BPS-7) on 23.02.2016	75.5	
		Adil Khan	Bashir Ahmad Khan	15.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	75.5	
	+1	ibad Ullah	Darwish Khan	06.04.1993	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02-2016	- 75:5-	
	42	lan Onan	Abdul Samad	02.02.1995	23.02.2016	23.02.2016	Appointed a Scoretary (BPS-7) on 23.02.2016	75.5	
<b>N</b>	43	Akbar Ali		02.05.1994	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	75	<b>.</b> .
	44	Naseer Khan	Jafar Khan	. 15.08.1994	23.02.2016	- 23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016-	<u>, 75</u>	·· -
-	- 45 -	Farooq Badshah	Saleh Badshah	15.04,1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	74.5	ļ
	46	Muhammad Saqib Khan	Raheem Khan	25.03.1992	23.02.2016	23.07.2016		74.5	
	u 47	Muhammad Adil	Abdul Qadir		23.02.2016	23.02.2016		74	] .
	48	Muhammad Salman	Hussain Khan	24.01.1989	23.02.2016	23.02.2016		74	]
• •	49	Атап Кһаз	Waheed Uilah	06.04.1989	23.02.2016	. 23.02.2016		74	]:
. '	50	Muhammad Asad Zia	Farman.	05.03.1990	23.02.2016		Appointed as Secretary (BPS-7) on 23.02.2016	74	· · ·
	51	Farhad Ali	Lingat Ali	- 03.04.1990	23.02.2016	23.02.2016		74	<b>]</b> ·
	52	Muhammad Junaid	Muhammad Yaseen	03.01.1992	23.02.2016	23.02.2016		74	<b>]</b> , '
	53	Noman Sadiq 🕐	Noor Badshah	01.04.1995	23.02.2016	23.02.2016		73.5	<b>1</b> .
	54	Ali Raza	Nisar Muhammad	15,12,1990		23.02.2016		73.5	1
, <b>`</b>	55	Shahid Hussain	Shahbaz Khan	01.01.1992	23.02.2016	23.02.2016		· 73	1 -
1.	56	Muhammud Imran	Said Ahmad Jan	12.12.1989	23.02.2016	23.02.2016		73	
•	57	Mubassar Shah	Fazle Malik	18.03.1992	23.02.2016			· 73	1.
•	. 58	Muhammad Wagas	Sheikh Muhammad	20.02.1996	· 23.02.2016 ·	23.02.2016		72.5	1
		· Tahir Rahman	Ghafoor Rahman	05,03,1989	23.02.2016	23.02.2016		72.5	1
	60	Syed Bilawal Hussain	Syed Bashir Hussain	25.09.1990	23.02.2016	23.02.2016		12.5	4
	61	Muhammad Arif	Mir Alam	12.02.1991 .	23.02.2016	23.02.2016		, 72.5	4
	62	Muhammad Zaib	Faiz Muhammad	08.04.1992	23.02.2016	23.02.2016		72.5	f .
	63	Abdul Haszeb	Hazrat Umar	04.05.1993	23.02.2016	23.02.2016	1		- <b>i</b> .
••		Arshad Ali	Jan Syed	[7.03.199]	23.02.2016	23.02.2010		72	4 .
	64		Pir Muhammad	13.03.1993	23.02.2016	23.02.2010			- <b> </b> '.
	65	Salman Ullah	Muhammad Irshad	20.10.1994	23.02.2016	23.02.2010		72	-1
	66	Ishfaq Ali	· Pazir Gul	12.02. [ 99]	23.02.2016	23.02.2010	Appointed as Secretary (BPS-7) on 23.02.2016	71.5	l
	67	Abraic Ahmad	razir Gui				······	.*	

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	1		•		•		71.5
68	Syed Amjid Ali Sliah	Syed Jamai Shah	15.08.1991	- 23.02.2016	23.02.2016	Appointed as Secretary (HPS-7) on 23.02.2016	71
69	Zahid Hussaln	Gul Zada	09,02,1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	- 71
70	Zakir Klian	••• Gul منه T	17.03.1991	23.02.2016	23.02.2016	Appointed as Secretary (BI'S-7) bo 23.02.2016	71
71	Haider Sher	Umar Sher	15.03.1993	23.02.2016	23.02.2016	Appointed as Secretary (11/5-7) on 23.02.2016	71
<u>72</u> ·		Namoos Ethan	4 01.05.1994	23.02.2016	23.02.2016	Appointed as Secretary (IIPS-7) on 23.02,2016	70.5
73	Muhammad Yaqub	Muhammad Ibrahim	12,01,1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	70
74	Irfan Khan	Fazli Qadar	28.08.1990	/ 23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	70
75	Mohsin Khan	Hassan Khan	01.08.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.1016	70
76	Bilal Khan	Alam Zeb Khan	<u>, 15.01.1993</u>	23.02.2016	23.02.2016;.	Appointed as Secretary (BPS-7) on 23.02.2016	68.5
77	* Mubammad Islam	Anwar Zeb	05.05.1993	. 23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	67
, 78	Gul Taj	Zahir Taj	01.03.1990	- 23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	66
179	Imiaz Ali	Aziz Ullah	/ 10.01.1989	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016.	
180	Junaid Ur Rehman	Kifayat Ullah	01.02.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	65
B}	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 Jamai Shah	25.04.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	64.5
83	Sajjad Ali	Syed Hussain	15.01.1996	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	64.5
84	Muhammad Asil	Ghulam Hussain	31.03.1991	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) an 23.02.2016	<u>615</u>
. 85	Amia Ul Haq	Muntaz Khan	30.05.1992.	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) or 23.02.2016	.63,5
86	Mubassir Khan	. Bakht Taj	05.09.1993	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	<u>62</u> .
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	Sajid Khan	Syed Zarman	05.02.1990	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	61.5
90	Imad Nacem	Fazli Nacem	10.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	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-		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	\$7
94	Hassan Nasir	Sabir Ali	02.02.1995	23.02.2015	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	54.5
95	Fawad Ali	Intiaz Khan	17.03.1992	23.02.2016	23.02.2016	Appointed as Secretary (BPS-7) on 23.02.2016	49
96	Wajid Ali	Ali Haider	10.02.1987	02.05.2016	02.05.2018	Appointed as Secretary (BPS-7) on 02.05.2016	84
97		Mukhtiar Hussain	04.02.1991	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	81
. 98		Sajad Ali	22/01/1992	20.05.2016		Appointed as Secretary (BPS-7) on 20.05.2016	81
.92		Muhammad Umar	13/02/1990	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	76
100		Sarfaraz Khan	6/11/1994	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	71
101		Shah Pasand Khan	13/04/1991	20.05.2016		Appointed as Secretary (BPS-7) on 20.05.2016	.70
102		Muhammad Khan	10/02/1994	20.05.2016	20.05.2016	Appointed at Secretary (DPS-7) on 20.05.2016	/ 70
103		Toj Wali Shah	31/03/1991	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	69
104		Multan	2/03/1991	20.05.2016	20.05.2016	Appointed as Secretary (Bi'S-7) on 20.05.2016	65.5

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	ور بند می ا				and the second	الأحرين وروحان	معسم بها الأنباب بالمراجع والمرب المسارية و		••		···· *	
		· · · · ·			•	·		- *				t
a series and a series of the s				. •	•			<u> </u>	,	*		
(† 1	los 🗍	Noman Jamat ()	amal Abdul Nasir	1/08/1995	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.03.2016	64.5	• .	• • •	- 1	
ſ	106	Shah Faisa) / /	Akmal Khan	.1/02/1992	20.05.2016	20.05.2016	Appointed as Secretary (BPS-7) on 20.05.2016	63.5	•	. •		
ľ	107	Zin Ul Ilaq Adil	Amia Ul Hag	-30/03/1991	23.05.2016	23.05.2016	Appainted as Secretary (13PS-7) on 23.05.2016	ł		•	· . ·	
ľ	105	and the second statement of the second s	Anwar UL Hag	23/05/1993	15.09.2017	15.09.2017	Appointed as Secretary (BPS-7) on 15.09.2017.				. •	•
ł			Feroz Shan	17.01.1990	25.09.2017	\$ 25/09/2017	Appointed as Secretary (BPS-7) on 25.09.2017.				-	
. 1			Marrof Shah	05.01.1989	23.02.2018	23/02/2018	Appointed as Secretary (BPS-7) on 23.02.2018	<u></u>			i	
Í	ut )		Inayat Ali Shah	02.05.1998	30.11.2018	30.11.2018	Appointed as Secretary (BPS-7) on 30.11.2018 under deceased son quota.	·				•
		Mohib Ullah	Hamish Gul	15.03.1971	02,06.1990	30.04.2019	Promoted to Secretary (BPS-9) on 30.04.2019					
		Arshad Hussain	Fagir Hugsain	03.04.1974	25.07.1993	30.04.2019	Pramoted to Secretary (BPS-9) on 30.04.2019.					
			Shamshad Khan	12.01.1973	16.03:1994	~ 30:04:2019	Premoted 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		•	-		
	· · · · · · · · · · · · · · · · · · ·	Zakir Muhamamd		12.07.1971	01.01.1995	/30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019/	· ·	•			
		Muhammad Salim	Muhammati Rahim	04.02.1983	20/10/2005	10.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019			• •	•	
	117	Muhammad Zaman	Muhammad Aslam	20.04.1977	22.04.2013	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019	•	•		-	
-	118	Bashir Muhammad	Dilawar Khan		22,04,2013	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019				•	
	119	Umar Farooq	Saif Ur Rehman	11.02.1992	03.04.2015	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019		l	•		
	120	Muhammad Mustafa	Miroj Muhammad	02.10.1977	03.04.2015	30.04.2019	Promoted to Secretary (BPS-09) on 30.04.2019		1			
	151	Sami Ullah	Aman Ullah Khan	. 11.05.1979	05.07.2019		Appointed as Secretary (BPS-9) on 05.07.2019	136			•	
	122	Jan Muhammad	Shams UI Qamar .	. 15.01.1989	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	135.5	1		• .	
	123	Muhammad-Imran	Muhammad Parvez	03.03.1990		05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	128	•			
	124	Nouman	Ghulam Rasool	25.04.1993	05.07:2019	- 05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	127	l •	• ,		•
	125	Kashan Ali	Ensan Alt	01.09.1993	05.07.2019 05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	127		1		
	126	Umair Khan	Siraj Ur Rehman	07.04.1995			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	l I		•	
	· 128	thiisham Ui Haq	Noor UI Haq	20.08.1987	<u>' 05.07.2019</u>	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019 -	125	1	۲.		
	129	Sibghat Ullah 6	Jala Ud Din -	09.03.1992	,05.07.2019		Appointed as Secretary (BPS-9) on 05.07.2019	125 -	1			
7	130	Wisal Muhammad	Gul Nabi	- 05.03.1994	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	118.5	1			
•	131-	Muhammad Taimoor khan	Gul Bahadar	17.06.1999	05.07.2019	05.07.20(9	Appointed as Secretary (BPS-9) on 05.07.2019	117.5				
	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	Ratian Sala Khan	03.02.1985	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	114	1			
٠	134	Farhad Ali	Murad Ali	06.02.1995	05.07.2019	05.07.2019	Appointed as Secretary (BPS-9) on 05.07.2019	.f	1		۰.	
		Muhammad Abbas Khan	Zulfigar Ali	02.02.2000	22.07.2019	22.07.2019	Appointed as Secretary (BPS-9) on 22.07.2019 under deceased san quota.		1			
	·		Rahlm Gul	25.04.1996	26.07.2019	* 26.07.2019	Appointed as Secretary (BPS-9) on 26.07.2019	121	4	•	•	
	136	Sadam Hussin	Mocen Ud Din	24.03.1995	18.05.2020 '	18.05.2020	Appointed as Secretary (BPS-9) on 18.05.2020	128	4			
	137	Abdul Majid	Zahir Shah	10.09.1994	18.05.2020	18.05.2020	Appointed as Secretary (BPS-9) on 18.05,2020	114	1			
	138	Zeeshan Ahmad	Farli Rahman	29.03.1993	12.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06 2020		$\mathbf{I}$			
	. 139	Adnan Khan	Milas Muhammad	18.04.1992	19.12.2017	05,06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	. <b></b>	<b>」</b> *			
	140	Shehryar Kli40	Truing to offering	2			• • • •	· · · · · · · · · · · · · · · · · · ·			<u> </u>	

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4.7 	141		Shamshad Khan	- 05.02.1979	21.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
		Ibad Ullah	Abid Ullah	/ 04.04.1997	21.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
		Muhammad Tufail	Ghani Rahman	07.05.1998	22.12.2017	05.06,2020	Promoted to Secretary (BPS-9) on 05.06.2020	
ì	144	Wascem Ullah	Fazal Waliab	06.10.1992	26.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
		Muhammad Ilyas	Munaminad labat	01.04.1996	26.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
	146	Mushtag Ahmad	Muhammad Aziz	01.04.1994	01.03:2018	.05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	·····
•		Kamran Khan	Hazrat Hassan	02.02.1977	28.02.2018	05.06.2020	Promoted to Secretary (BPS-9) on 05.06,2020	· · · · · · ·
i i	All a second second	Sajjad Ali	Muhammad Gu'i	01.01.1983	28.02.2018	.05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	·
	149	Shoaib Khan	Shah Pasand Klian	07.03.1986	28.02,2018	05.06.2020	Promoted to Secretary (BPS-9) on 05.06,2020	
			Amir Zada	11.11.1993	28.02.2018	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	<b></b>
		Ayaz Ur Rehman	Fayaz Ur-Renman	28.02.1999	26.12.2017	05.06.2020	Promoted to Secretary (BPS-9) on 05.06.2020	
	151	Pir Hamza Sohail	Muhammad Sohail	24.03.2002	05.06.2020	05.06.2020	medical son quota.	Son quota
	<u> </u>		Mushtan Masih	24.07.1992	16.09.2021	16.09.2021	Appointed as Secretary (BPS-9) on 16.09.2021	80
	153	Sunny Mushlaq	Younas Masih	15.03.2002	16.09.2021	16.09.2021	Appointed as Secretary (BPS-9) on 16:09.2021	78
	154	Ayub Masih	Sajid Raza	01.06.1992	16.09.2021	16.09.2021	Appointed as Secretary (BPS-9) on 16.09.2021	. 77
	155	Danial Adison	Mumtaz Ali Khan	27.03.1990	. 14.10.2021	14.10.2021	Appointed as Secretary (BPS-9) on 05.06.2020 under	San guota
	156	Salmon Ali Khan	IMINITIAS VILICIAN					

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

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

#### against the Office Order hearing No. LG-MRD/Establishment/3832, Dated: 09/07/2024 (Tentative Seniority Subject: 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 secretarics' 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.

(Coples of the office order and impugned tentative list are hereby attached as Annexure "A" and "A-1")

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) 3-1/Establishment/2022/4978-94, Dated: 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;

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.

(Copies of Office Order Dated: 08/11/2021 and both lists are hereby attached as Annexure "II", "C" & "C-I")

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- B. That, impugned order dated: 09/07/2024 is upshot of misconstruing order No. Director (LG) 3-I/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-departments like Notification No. Director (LG) 3-department Z017/10803, Dated: 28th February, 2018 of the Director General Local Government and Rural Development Director General Local Government and Rural Development Shall be made in accordance with Section 17 (4) of the promotions shall be made in accordance with Section 17 (4) of the 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 natification 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 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. (50(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 3656(AD Lit-II), Parliamentar

(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 us 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 I.t. Junn

Name	Father Name	D.O.B	Signature

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_

Rabiv Khay



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## DIRECTORATE GENERAL OCAL GOVERNMENT & RURAL DEVELOPMENT DEPARTMENT KHYBER PAKHTUNKHWA

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

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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.

Subject:

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.

ASSISTANT DIRECTOR (ADMIN/HR) LG&RDD

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

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

ASSISTANT DIRECTOR (ADMIN/HR) LG&RDD

Tel # 091-9219584

Email: adalardkp@amail.com

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BEFORE THE	<u>VAKALA</u> KHYBER PAKHTL PESHA	<u> INKHWA S</u>	SERVICE TRIBUNAL,
	Appeal	No	_/20〕
Sabir	Khan		(APPELLANT) (PLAINTIFF) (PETITIONER)
Gost	VER	SUS	(RESPONDENT) (DEFENDANT)
I/We/	Sabir Khat	1	

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our. Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated.___/202

CLIENT

ACCEPTED

NOOR MOHAMMAD KMATTAK ADVOCATE SUPREME COURT

WALEED ADNAN

UMAR FAROOQ MOHMAND

MU MAHMOOD JAN ADVOCATES

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OFFICE: Flat No. (TF) 291-292 3rd Floor, Deans Trade Centre, Peshawar Cantt. (0311-9314232)