

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

C.M. NO.                      /2024

IN

APPEAL NO. 1888/2022

MUHAMMAD AYAZ

VS

C&W DEPARTMENT

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APPELLANT

THROUGH:

  
MIR ZAMAN SAFI  
ADVOCATE

MOBILE NO.0333-9991564  
0317-9743003

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

C.M. NO. \_\_\_\_\_/2024

IN

APPEAL NO. 1888/2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16238

Dated 01-10-2024

MUHAMMAD AYAZ

VS

C&W DEPARTMENT

**APPLICATION UNDER ORDER-I, RULE-10 OF CPC, 1908 WITH  
EFFECT TO IMPLEAD THE FOLLOWING EMPLOYEES AS  
PRIVATE RESPONDENTS IN THE ABOVE TITLED APPEAL  
BEING NECESSARY PARTIES**

**PRIVATE RESPONDENTS:**

- 1- Mr. Fahad Nazir S/O Fazal Mahmood, Tracer, O/O the XEN Building Division D.I Khan.
- 2- Ahmad Khan S/O Muhammad Khan, Tracer, O/O the XEN Building Division D.I Khan.
- 3- Muhammad Waqar S/O Sarfaraz Khan, Tracer, O/O the XEN Building Division Swabi.
- 4- Muhammad Shafiq S/O Muhammad Nazir, Tracer, O/O SE Dir Lower.
- 5- Zeeshan Amin S/O Noor Ul Amin, Tracer, O/O the SE PBMC.
- 6- Murad Ali S/O Gul Jamal, Tracer, O/O the XEN Building Division Swabi.
- 7- Zaheer Iqbal S/O Muzafar Said, Tracer, O/O the XEN Building Division Dir Upper.
- 8- Talat Hussain S/O Fahim Hussain, Tracer, O/O the XEN Building, Hangu.
- 9- Zeeshan S/O Khurshid Ahmad, Tracer,
- 10- Habib Ullah S/O Abid Hussain, Tracer, O/O the SE Mardan.
- 11- Muhammad Nauman S/O Sairf Ur Rehman, Tracer, O/O the XEN Building, Bannu.
- 12- Tauseef Ghani S/O Abdul Ghani, Tracer, O/O the XEN Building, Kohat.
- 13- Khurshid Ahmad S/O Sher Nawaz, Tracer, O/O the XEN Building, Khyber.
- 14- Zakir Ullah S/O Muhammad Zarif, Tracer, H/W South Waziristan.
- 15- Muhammad Noman S/O Muhammad Noor, Tracer, O/O the XEN Building, Bannu.
- 16- Muhammad Rashid S/O Gul Mast Khan, Tracer, O/O the XEN Building, Nowshera.
- 17- Ikram Ullah Shah S/O Muhammad Javed Khan, Tracer, H/W South Waziristan. Office of the Chief Engineer North.
- 18- Muhammad Jehangir S/O Muhammad Nazeer, Tracer, H/W Mansehra.

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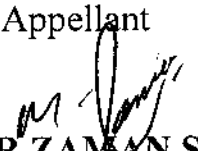
- 19- Aizaz Rasool S/O Ejaz Rasool, Tracer, O/O the XEN Building, Lakki Marwat.
- 20- Zakir Ullah S/O Umar Khan, Tracer, O/O the XEN Building, Swat.
- 21- Salman Tariq S/O Muhammad Khan, Tracer, O/O the XEN Building, Bajaur.
- 22- Zakir Ullah S/O Noor Ul Basar, Tracer, O/O the XEN Building, Bajaur.
- 23- Ahmadullah Khan S/O Akhtar Ali Khan, Tracer, SE Circle Bannu.
- 24- Muhammad Faizan S/O Muhammad Rafique, Tracer, O/O the XEN Building Torghar.
- 25- Muhammad Nadeem S/O Bostan Khan, Tracer, O/O the XEN Building, Battagram.
- 26- Fazli Subhan S/O Fazal Amin, Tracer, O/O the XEN Building, Buner.

**R/SHEWETH:**

1. That the above mentioned appeal is pending adjudication before this Honorable Court which was fixed for hearing on 03.10.2024.
2. That the appellant filed the above mentioned appeal against the impugned seniority list dated 15.04.2022 whereby juniors to the appellant have been marked senior by disturbing the seniority position of the appellant from serial No.15 and enlisted at serial No.38. Copy of the seniority list is attached as annexure.....A.
3. That the appellant filed the above mentioned appeal against the impugned seniority list dated 15.04.2022 but inadvertently the employees/respondents who are the necessary parties have not been made as private respondents.
4. That the above mentioned employee from serial No.1 to 26 are the necessary parties in the above mentioned appeal, therefore, the same need to be impleaded as private respondent No. 3 to 28 in the array of respondents of the main appeal.

It is, therefore, most humbly prayed that on acceptance of this application, the above named officials may very kindly be impleaded as private respondent No. 3 to 28 in the array of respondents in the above titled appeal.

Dated: 30.09.2024.

Appellant  
Through:   
MIR ZAMAN SAFI  
ADVOCATE

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

C.M. NO. \_\_\_\_\_/2024

IN

APPEAL NO. 1888/2022

**MUHAMMAD AYAZ**

**VS**

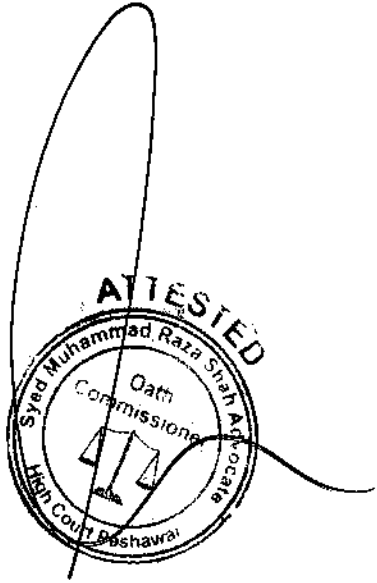
**C&W DEPARTMENT**

**AFFIDAVIT**

I **Mir Zaman Safi, Advocate** on behalf of the petitioner, do hereby solemnly affirm that the contents of this **appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.



**MIR ZAMAN SAFI**  
**ADVOCATE**



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OFFICE OF THE CHIEF ENGINEER, CENTRE  
COMMUNICATION & WORKS DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR  
No. 198-EI 955 ICE/C&WD  
Dated Peshawar the 15 / 04 / 2021

### FINAL SENIORITY LIST

In pursuance to Section 8 (1) and (5) of the Khyber Pakhtunkhwa Civil Servants Acts 1973, read with C&W Department (Recruitment/Appointment) Rules 2010 notified vide No. SOE/C&WD/8-12/2009 dated 25/03/2010. The Final Seniority List of Tracers (BPS-07) having 3 Years Diploma in Civil / Electrical / Mechanical Technology as stood on 15/04/2021 is hereby Notified as under:-

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of Appointment to PWD.	Date of Appointment to Class	Remarks
1	Adul Qadeer Khan	Ghulam Farid	Abbottabad	(i) F.Sc. (ii) 3 Yrs DAE (C)	07-05-1987	15/01/2011	15/01/2011	Appointed as Sub-Engineer on Acting Charge Under Deceased Sons Quota
2	Shaukat Ayaz	Sher Afsar Khan	Swabi	(i) Matric (ii) 3 Yrs DAE (C)	16/02/1979	30/12/2006	01/04/2011	Appointed as Sub-Engineer on Acting Charge 30-12-2006 to 31-03-2011 as Carpenter (BPS-06) and Re-designated as Tracer BPS (05) w.e.f 01-04-2011
3	Syed Amjad Ali Shah	Syed Muzafar Ali Shah	Chitral	(i) B.A. (ii) 3 Yrs DAE (M)	21/04/1973	09/01/1996	22/06/2011	Appointed as Sub-Engineer on Acting Charge 09-01-1996 to 21-06-2011 as Gauge Reader (BPS-05) and Re-designated as Tracer BPS (05) w.e.f 22-06-2011
4	Mohammad Nadeem	Mohammad Salim	Swabi	(i) F.Sc. (ii) 3 Yrs DAE (M)	01-04-1967	01-02-1995	07-05-2012	01/02/1995 to 01/05/2012 as Junior Clerk (B-05/071) & Re-designated as Tracer (B-05) w.e.f 07/05/2012.
5	Sami Ullah Khan	Naeem Khan	Lakki	(i) Matric (ii) 3 Yrs DAE (c)	04/04/1992	08-05-2012	08-05-2012	Under deceased's son quota
6	Muhammad Zakir Ghani	Muhammad Ghani	Karak	Matric DAE (C)	15/08/1993	09/05/2012	09/05/2012	
7	Ubaid-ur-Rahman	Abdur Rahman	Battagram	(i) Matric (ii) 3 Yrs DAE (C)	20/03/1979	15/05/2012	15/05/2012	
8	Ajmal Khan	Munif Khan	Peshawar	(i) Matric (ii) 3 Yr DAE (E)	11/02/1988	15/05/2012	15/05/2012	
9	Muhammad Imran Khattak	Haidar Zaman	Nowshera	(i) BA (ii) 3 Yr DAE (C) 5/2014	21/03/1986	18/5/2012	18/5/2012	
10	Zeeshan Danish	Sadr-ud-Din	Lakki Marwat	(i) Matric (ii) DAE (C)	15/02/1987	18/5/2012	18/5/2012	
11	Fasi Ullan	Amir Sardar	Lakki Marwat	(i) Matric (ii) DAE (C)	20/01/1988	18/5/2012	18/5/2012	
12	Zafar Mahmood	Fazal Mahmood	Dir Upper	(i) Matric (ii) DAE (M)	01/01/1993	18/5/2012	18/5/2012	
13	Naveed Ullah	Abdul Qudoos	Lakki	F.A. DAE (C)	11/04/1990	21/05/2012	21/05/2012	Under deceased's son quota

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"A"

S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Job Class	Remarks
14	Muhammad Siddiq	Mutabar Khan	Lakki Marwat	(i) B.A (ii) 3 Yrs DAE (E) + DAE (C)	18/09/1991	02-01-2013	02-01-2013	Under deceased's son quota
15	Abdur Rehman Khan	Abdul Hamid Khan	Lakki Marwat	(i) Matric (ii) DAE (C)	01/11/1993	24/01/2013	24/01/2013	Under deceased's son quota
16	Danish Nawaz	Muhammad nawaz	Mansehra	(i) B.A (ii) 3 Yrs DAE (C)	10/07/1986	01/02/2013	01/02/2013	01/09/2006 to 31/01/2013 as Plumber (BPS-05) and Re-designated as Tractor (BPS-05) w.e.f 01/02/2013
17	Muhammad Ayaz	Banat Gul	Peshawar	(i) Matric (ii) 1 year Servay (iii) DAE	12-08-88	16/05/2014	16/05/2014	Under deceased's son quota
18	Fahad Nazir	Nazir Ahmad	D.I.Khan	(i) Matric (ii) DAE (C)	12/04/1994	19/05/2014	19/05/2014	Under deceased's son quota
19	Ahmad Khan	Muhammad Khan	Bannu	(i) Matric (ii) DAE (C)	25/03/1994	26/05/2014	26/05/2014	Under deceased's son quota
20	Muhammad Waqar	Sarfraz Khan	Swabi	(i) Matric (ii) DAE (C)	01/04/1995	26/05/2014	26/05/2014	Under deceased's son quota
21	Muhammad Shafiq	Muhammad Nazir	Dir Upper	(i) B.A (ii) 3 Yrs DAE (C)	27/05/1990	27/05/2014	27/05/2014	Under deceased's son quota
22	Zeeshan Amin	Noor-Ul-Amin	Peshawar	(i) Matric (ii) DAE (C)	10/11/1989	26/6/2015	26/6/2015	Under deceased's son quota
23	Murad Ali	Gul Jamal	Bunir	(i) Matric (ii) DAE (C)	07/03/1991	26/06/2015	26/06/2015	Under deceased's son quota
24	Zaheer Iqbal	Muzafar Said	Dir Upper	(i) Matric (ii) DAE (C)	10-10-89	27/8/2015	27/8/2015	Under deceased's son quota
25	Talat Hussain	Fahim Hussain	Peshawar	(i) Matric (ii) DAE (C)	10/03/1997	10-11-2015	10-11-2015	Under deceased's son quota
26	Zeeshan	Khurshid Ahmad	Peshawar	(i) Matric (ii) DAE (C)	13/04/1995	29/05/2017	29/05/2017	Under deceased's son quota
27	Habib Ullah	Abid Hussain	Mohmand	(i) Matric (ii) 6-months Servay course. (iii) 03-Months Auto-CAD Course. (iv) DAE (Elec-2016)	13/03/1997	01/11/2017	01/11/2017	Under deceased's son quota
28	Muhammad Nauman	Saif-ur-Rehman	DIKhan	(i) F.Sc (ii) 6-months Servay course. (iii) 06-Months Auto-CAD Course.	11-10-97	01/11/2017	01/11/2017	Under deceased's son quota
29	Tauseef Ghani	Abdul Ghani	Karak	(i) Matric (ii) DAE (Civil)	05/07/1992	26/09/2011	02/11/2017	Previous service as Ferro Printer w.e.f 26-09-2011

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Class	Remarks
30	Khurshid Ahmad	Sher Nawaz	Lakki Marwat	i) Matric ii) 1-year Servay course. iii) 06-Months Auto-CAD Course	16/04/1995	01/08/2018	01/08/2018	Under deceased's son quota
31	Zakirullah	Muhammad Zarif	North Waziristan	i) Matric ii) 06-Months Auto-CAD Course. iv). DAE Civil	16/04/1983	04/12/2018	04/12/2018	Under deceased's son quota
32	Muhammad Noman	Muhammad Noor	Bannu	BS (Electrical)	01/01/1993	09/08/2019	09/08/2019	Under deceased's son quota
33	Muhammad Rashid	Gul Mast Khan	Nowshera	DAE (Civil)	05/05/1993	09/08/2019	09/08/2019	Under deceased's son quota
34	Ikram Ullah Shah	Muhammad Javed Khan	South Waziristan	DAE (Civil)	15/06/1998	09/08/2019	09/08/2019	Under deceased's son quota
35	Muhammad Jahangir	Muhammad Nazeer	D.I.Khan	DAE (Civil)	08/01/1999	09/08/2019	09/08/2019	Under deceased's son quota
36	Aizaz Rasool	Ejaz Rasool	Bannu	BS (Civil)	12/06/1994	16/08/2019	16/08/2019	Under deceased's son quota
37	Zakir Ullah	Umar Khan	Lakkir Marwat	BS (Civil)	07/10/1994	19/08/2019	19/08/2019	Under deceased's son quota
38	Salman Tariq	Muhammad Khan	Swat	DAE B.Tech (Civil)	11/05/1989	23/09/2019	23/09/2019	Test conducted through ETEA
39	Zakir Ullah	Noorul Basar	Bajaur	BS Civil	01/01/1994	23/09/2019	23/09/2019	Test conducted through ETEA
40	Ahmadullah Khan	Akhtar Ali Khan	Bannu	B.Tech (Civil)	01/04/1986	24/09/2019	24/09/2019	Test conducted through ETEA
41	Muhammad Faizan	Muhammad Rafique	Mansehra	B.Tech (Civil)	01/03/1995	24/09/2019	24/09/2019	Test conducted through ETEA
42	Muhammad Nadeem	Bostan Khan	Abbottabad	B.Tech (Civil)	22/04/1988	25/09/2019	25/09/2019	Test conducted through ETEA
43	Fazli Subhan	Fazal Amin	Swat	B.Tech (Civil)	09/05/1989	25/09/2019	25/09/2019	Test conducted through ETEA
44	Hanzala	Muhammad Amin Khan	South Waziristan	DAE B.Tech (Civil)	01/03/1992	25/09/2019	25/09/2019	Test conducted through ETEA
45	Waqar Arif	Muhammad Arif	Kohat	B.Tech (Civil)	23/03/1994	25/09/2019	25/09/2019	Test conducted through ETEA
46	Sardar Ali Khan	Gul Marjan Khan	Swat	B.Tech (Civil)	10/01/1995	25/09/2019	25/09/2019	Test conducted through ETEA
47	Ijaz Mamoor Khan	Musharaf Khan	FR Bannu	BS Civil	05/02/1992	26/09/2019	26/09/2019	Test conducted through ETEA

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S.No	Name of Official	Father's Name	Domicile	Qualification	DOB	Date of Appointment to PWD	Date of Appointment to Ad Class	Remarks
48	Noor Zeb Khan	Imtiaz Khan	Bannu	B.Tech (Civil) DAE (Civil)	15/10/1990	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
49	Aiman Baloch	Muhammad Tahir	D.I.Khan	DAE (Civil)	25/01/1993	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
50	Muhammad Adnan	Said Muhammad	Mardan	DAE (Civil)	12/01/1995	12/02/2020	12/02/2020	Under deceased's son quota dated 12/02/2020
51	Naveed Khan	Mohammad Ramzan	D.I.Khan	DAE (Civil)	03/03/1987	13/02/2020	13/02/2020	Under deceased's son quota dated 12/02/2020
52	Tanzilur Rehman	Muhammad Hanif	D.I.Khan	DAE (Civil)	14/11/1997	13/02/2020	13/02/2020	Under deceased's son quota dated 12/02/2020

CHIEF ENGINEER (CENTRE)

ADMINISTRATIVE OFFICER

Copy of the above forwarded to:-

1. The Secretary to Govt of Khyber Pakhtunkhwa, C&W Department Peshawar.
2. The Chief Engineers (North) (CDO) (Merged Area) (East) C&W Department, Peshawar.
3. The Managing Director, Pakhtunkhwa Highways Authority, Peshawar.
4. Project Director FMR/PMU C&W Department Peshawar.
5. All the Superintending Engineers in C&W Department Khyber Pakhtunkhwa (i/c Merged Area).
6. All the Executive Engineers in C&W Department Khyber Pakhtunkhwa (i/c Merged Area).
7. The Deputy Director (IT) C&W Secretariat Peshawar. He is requested to upload the same on the website of C&W Department