

2)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M. NO. _____ /2024

IN Service Appeal No. _____ /2024

Saleem Javed (WMO)

VS

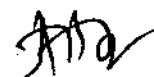
D.O, OFWM and another

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Petitioner

Through Counsel



Aftab Hussain

Advocate High Court

①

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M. NO. _____/2024

IN Service Appeal No. 2203 /2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 17843

Dated 01-11-24

Saleem Javed (WMO)

VS

D.O, OFWM and another

Service Appeal U/S 4 of The Service Tribunal Act 1974

Application U/S 151 read Order VII Rule 18 of The Code of Civil Procedure for leave to place additional documents on file.

Respectfully Sheweth,

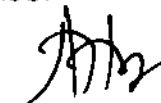
1. That the captioned Service Appeal is pending adjudication before this Honorable Tribunal which is fixed for today.
2. That the applicant/ appellant seeks leave to place on record an additional document, namely, the Departmental Appeal/ Representation, which was inadvertently omitted from record. The applicant prays that this Honorable Tribunal may be pleased to the filing and reception of the said document as part of the record and consider the same in adjudicating the present appeal.
3. That the said document is crucial to the applicant's case and its omission shall prejudice the applicant's rights.
4. That the applicant undertakes to serve a copy of the said documents on the respondents forthwith.

Prayer:

In light of the above, it is most humbly prayed that leave may, kindly, be granted to the petitioner to submit the additional document, namely, the Departmental Appeal/ Representation, to the petition.

Petitioner

Through Counsel


Aftab Hussain

Advocate High Court

Dated: November 05, 2024.

②

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M. NO. _____ /2024

IN Service Appeal No. 2203 /2024

Saleem Javed (WMO)

VS

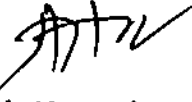
D.O, OFWM and another

CERTIFICATE

As per instruction received from my client/petitioner, it is certified that no such like writ petition has been earlier filed before this Honorable Court.

Petitioner

Through Counsel



Aftab Hussain

Advocate High Court

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M. NO. _____ /2024

IN Service Appeal No. _____ /2024

Saleem Javed (WMO)

VS

D.O, OFWM and another

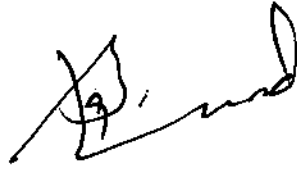
AFFIDAVIT

I, Saleem Javed (WMO) ON FARM WATER MANAGEMENT OFFICE, Near GOVERNMENT HIGH SCHOOL Balambat, Timergara, District Dir Lower, do hereby solemnly affirm and declare on oath that all the contents of this **application** are true and correct to the best of knowledge and belief and nothing has been kept concealed or withheld from this Honorable Court.


DEPONENT

Saleem Javed

(Applicant)

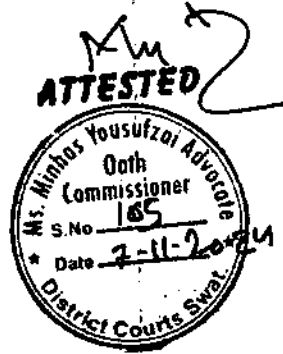


Identified by:



Aftab Hussain

Advocate High Court



(4)

Annexure

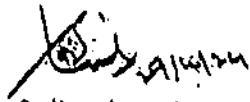
Director General
On Farm Water Management
Khyber Pakhtunkhwa Peshawar.

Subject: DRAFT SENIORITY LIST OF AD/AD PLANNING AD (FO), AD (TECH),
INSTRUCTOR/AD TRAINING & WMO BPS 17.

Respected Sir:

Reference to letter No. 2478/DO/OFWM/ East dated Peshawar the. 06-12-2023. In pursuance to order dated 12-10-2023 of august Supreme Court of Pakistan in C.P No.1763/2019, 1766/2019 & 1823/2019 title "Fazal Sher & others VS Govt. of Khyber Pakhtunkhwa" & Subsequent notification No. SOE(AD)3(2)291/ Seniority BS17/23/WM (representative Seniority list of AD /AD(P), the Director (FO)/AD(Tech)/ Instructor /AD-training & WMOs (BPS-17) of OFWM as 01-01-2024. Sir I have requested on 04-12-2023 to treat my seniority like Mr Fazal Sher WMO because he is same in court case but my request was not heard. There for it is requested again to consider my date of initial appointment as 23rd November 2004 as included in Seniority of Fazal Sher & others. Moreover I have M.SC (Hons) Rural Development in 2002 may be included for the purpose of seniority.

The copy of notification of 23rd November 2004 and M.SC (Hons) Agriculture are attached with the application.


Saim Javed
WMO
On Farm Water Management
Dir Lower.

*Certified to be true
copy.*





www.ofwm.kp.gov.pk
 GOVT. OF KHYBER PAKHTUNKHWA
 ON FARM WATER MANAGEMENT DEPARTMENT
 Balambat Dir Lower at Timergara

5

(Handwritten mark)



(Handwritten mark)

(Handwritten mark)

downmdirlower@gmail.com On Farm Water Management Dir Lower @ofwmdirlower 0945-9250109

No. 284 /DOWM Dir Lower Dated the

29 / 04 / 2024

To.

Director General
 On Farm Water Management
 Khyber Pakhtunkhwa Peshawar.

Subject: DRAFT SENIORITY LIST OF AD/AD PLANNING AD (FO) AD (TECH) INSTRUCTOR/AD TRAINING & WMO BPS 17.

Respected Sir:

Enclosed please find herewith the application of Mr. Salim Javed WMO for correction of date of initial appointment & inclusion of MSC (Hons) in seniority list for further necessary action please.

(Handwritten signature)

District Officer
 On Farm Water Management
 Dir Lower.

Certified to be true copy

(Handwritten signature)

Copy of the true

Sajid Javed
WMO
On Farm Water Management
Dir. Etover

Retrieved to letter No. 2478/DG/OF/WM/Estt. dated Peshawar the: 06-12-2023. in
pursuance to order dated 12-10-2023 of august Supreme Court of Pakistan in C.P
No.1763/2019 & 1823/2019 title "Fazal Sher & others VS Govt. of Khyber
Pakhtunkhwa" & Subsequent notification No. SOE(A/D)3(2)291/ Seniority BS17/23/WM
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& WMOs (DPS-17) of OFWM as 01-01-2024. Sr-1 have requested on 04-12-2023 to treat my
seniority like Mr Fazal Sher WMO because he is same in court case but my request was not
heard. There for I have requested again to consider my date of initial appointment as 23rd
November 2004 as included in Seniority of Fazal Sher & others. Moreover I have M.SC (Hons)
Kurt Development in 2002 may be included for the purpose of seniority.

Respected Sir

**DIRECTOR GENERAL
ON FARM WATER TRAINING & MANAGEMENT**

Subject

Director General
On Farm Water Management
Khyber Pakhtunkhwa Peshawar

Signature

(4)



www.ofwm.kb.gov.pk
GOVT. OF KHYBER PAKHTUNKHWA
ON FARM WATER MANAGEMENT DEPARTMENT
Malambat Dir Lower at Timergara

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downdirlower@gmail.com On Farm Water Management Dir Lower @ofwmdirlower 0945:9250109

Nb. 984 /DOWM Dir Lower Dated the

29 / 1 / 2024

To.

Director General
On Farm Water Management
Khyber Pakhtunkhwa Peshawar.

Subject: DRAFT SENIORITY LIST OF AD/AD PLANNING AD (EO), AD (TECH),
INSTRUCTOR/AD TRAINING & WMO BPS 17.

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Enclosed please find herewith the application of Mr. Salim Javed WMO for correction of date of initial appointment & inclusion of MSC (Hons) in seniority list for further necessary action please.

(Handwritten signature)

District Officer
On Farm Water Management
Dir Lower.

Certified to be true copy

(Handwritten signature)