


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 2435/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/11/2024	<p>The appeal of Mr. Haseeb Akbar presented today by Mr. Gul Tiaz Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 19/11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No 2435 / 2024

Haseeb Akbar

.....Appellant

**VERSUS**

The Commissioner D.I.Khan and others.

.....Respondents

**APPLICATION FOR FIXATION OF APPEAL ON 23.10.2024 FOR  
PRELIMINARY HEARING.**

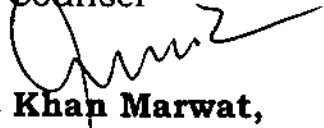
**Respected Sir,**

1. That the accompanied appeal is being filed before this learned Tribunal.
2. That other cases of the Counsel of Appellant are already fixed at principal seat on ~~19.11~~ 11.2024, therefore, it will be convenient for the Counsel of the Appellant that the instant appeal is also to be listed for preliminary hearing on 29.10.2024.

It is, therefore, humbly prayed that the accompanied Appeal may please be listed for hearing at Principal seat on 23.10.2024 on which date other cases of Counsel for the Appellant are already fixed.

Your Humble Appellant  
Through Counsel

Dated: 31/10/2024

  
**Gul Tiaz Khan Marwat,  
Advocate High Court, DIKhan**

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No 2435 / 2024

Haseeb Akbar

.....Appellant

**VERSUS**

The Commissioner D.I.Khan and others.

.....Respondents

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Dated: 31 / 10 / 2024

Your Humble Appellant,  
Through Counsel



**GUL TIAZ KHAN MARWAT,**  
Advocate High Court, D.I.Khan

I

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Service Appeal No 2435 / 2024

Haseeb Akbar Office Assistant office of the Deputy Commissioner  
District South Waziristan Upper at Tank. ....Appellant

**VERSUS**

1. The Commissioner D.I.Khan Division, D.I.Khan
2. The Deputy Commissioner District South Waziristan Upper at Tank.
3. Sanaullah Office Assistant office of the Deputy Commissioner District South Waziristan Upper at Tank .
4. Abdus Samad Office Assistant (Retired) C/O Deputy Commissioner District South Waziristan Upper at Tank
5. Fazal Rehman Office Assistant (Retired) C/O Deputy Commissioner District South Waziristan Upper at Tank

.....Respondents

**APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER OF WITHHOLDING AND NON-DISPOSAL OF REPRESENTATION DATED 10.07.2024 OF THE APPELLANT BY RESPONDENTS 1&2 WITHIN THE STATUTORY PERIOD IN RESPECT OF GRANTING PROFORMA PROMOTION TO APPELLANT WITH EFFECT FROM 19.11.2019.**

***Respectfully Sheweth:***

- (1) That the addresses of the parties given above are sufficient for the purpose of service of the parties.
- (2) That the appellant is a citizen of Islamic Republic of Pakistan and is a permanent resident of SWTU and being a citizen of the Country has the rights and obligation under the constitution.
- (3) That the Appellant was appointed as UDC in BPS-09 in the office of Additional Political Agent South Waziristan Agency vide order bearing Endst: No. 220-25/F&P/SWA dated 02.10.2012 on the

*Amir*

basis of Quota reserved for deceased employees children under Rule-10(4) of appointment, promotion and transfer Rules-1989. (Copy of appointment order is enclosed as **Annexure - A.**

- (4) That the appellant was posted and working in the office of Additional Deputy Commissioner (Finance & Planning) prior to merger of Tribal Area in to Settle Area under the orders of Govt.
- (5) That respondent No. 3 was appointed as Junior Clerk on 22.12.1987 while respondent No. 4 was appointed as Junior Clerk on 17.12.1980 while respondent No. 5 was appointed as Junior Clerk on 16.12.1980.
- (6) That respondents were promoted as a Senior Clerk/UDC on 19.02.2019 vide office order Endst: 712-21 dated 19.02.2019, therefore, respondents 3 to 5 were/are junior to the appellant as the date of appointment of appellant is 02.10.2012. Copy of promotion order dated 19.02.2019 is enclosed as **Annexure - B.**
- (7) That respondents 3 to 5 were further promoted as Office Assistants, vide office order No. 4055 dated 19.11.2019 but the appellant has been deprived from promotion for the reason not known to the appellant and thus the appellant being senior to respondents 3 to 5, has met out discriminatory treatment due to some hidden hands of the office of Deputy Commissioner District South Waziristan. Copy of order is enclosed as **Annexure - C.**
- (8) That after 25th Amendment Act-2018, the erstwhile Federal Tribal Areas of the KPK have been merged to the Province of KPK in pursuance of the Constitutional Amendment referred to

*Spun*

above, then the appellant submitted an application dated 23.12.2019 to the Competent Authority for inclusion of name of appellant and other employees of the Finance & Planning in the common and joint seniority list of officials working in the office of Deputy Commissioner South Waziristan Tribal District.

- (9) That it is very strange that in spite of lapse of sufficient long time up to 19.08.2020, no action has been taken on the application by the office of Deputy Commissioner SWTD then the appellant submitted another application dated 20.08.2020 for inclusion his name in the general / common seniority list of the officials of the Deputy Commissioner SWTD.
- (10) That the Deputy Commissioner SWTD sought guidance in the matter from the Commissioner D.I.Khan Division D.I.Khan vide letter No. 1328 dated 23.08.2020.
- (11) That the appellant was under apprehension that juniors to the appellant have promoted on the basis of wrong seniority list, therefore the appellant submitted an application dated 31.08.2020 to the Deputy Commissioner SWTD for provision of seniority list and copies of recent promotion orders of Assistants, the application of the appellant was forwarded by the ADC (Finance & Planning) to the Deputy Commissioner for consideration vide letter No. 143 dated 31.08.2020.
- (12) That feeling aggrieved from the impugned actions/ inactions of the office of Deputy Commissioner, the appellant then sought the indulgence of this learned Tribunal by filing Service Appeal No. 4986/2021 which came up for hearing before a Division

*guz*

Bench of this learned Tribunal at Camp Court D.I.Khan on 28.09.2022 and the same was disposed-off with observation and direction to the department to provide a copy of seniority list to the appellant within 10 days from passing of the order. Copy of order is enclosed as **Annexure - D**.

(13) That the order of this learned Tribunal dated 28.09.2022 was not implemented within the stipulated period of 10 days, therefore, the appellant then filed execution petition on 13.01.2023 where after the order of this learned Tribunal was implemented and seniority list was issued.

(14) That after issuance of seniority list, the appellant was promoted as office assistant (BPS-16) vide office order No. 1227 dated 17.04.2023. Copy of order is enclosed as **Annexure - E**.

(15) That the appellant submitted an application dated 10.07.2024 to respondent No. 2 for granting proforma promotion to the post of Office Assistant (BPS-16) with effect from 19.11.2019 on which date the junior persons i.e respondents 3 to 5 were promoted respectively and the application of appellant was forwarded to respondent No. 1 vide covering letter No. 5051-53 dated 10.07.2024 but no action has so far been taken by the office of respondent No. 1 in spite of lapse of statutory period of 90 days as provided under the law. Copies of letter and application are enclosed as **Annexure - F&G** respectively.

(16) That feeling aggrieved from the impugned actions/ inactions of the office of Respondents 1&2 and having no other speedy remedy, is obliged to knock the door of this Learned Tribunal

*G. M. 2*

under its Appellate Jurisdiction inter alia on the following grounds:

**GROUND:**

- A. That it is an admitted fact proved from record that the initial appointment of appellant as a Senior Clerk is 02.10.2012 while the date of promotion of respondents 3 to 5 is 19.02.2019 respectively, therefore, appellant is senior most employee than respondents 3 to 5 but the appellant has been deprived from promotion to the post of Office Assistant while granting promotion to respondents 3 to 5 on 19.11.2019.
- B. That due to non-inclusion of name of the appellant in the common seniority list of Senior Clerks of the office of Deputy Commissioner District South Waziristan in the year 2019, the appellant has been deprived of promotion to the post of Office Assistant (BPS-16) while granting promotion to respondents 3 to 5 on 19.11.2019 due to which there been caused great miscarriage of justice due to which the appellant had sustained evergreen financial loss that will be remained and sustained even after death in the shape of family pension etc.
- C. That it is settled proposition of law that promotion to the respondents 3 to 5 to the post of Office Assistants (BPS-16) were granted on the basis of seniority only but the appellant has been ignored rather deprived of promotion in spite of eligibility while granting promotion to respondents 3 to 5.
- D. That it is a settled proposition of service law that promotion to the next higher post is to be granted on the basis of seniority

*Qum*



cum fitness.

- E. That the appellant is otherwise eligible for granting proforma promotion to the post of Office Assistant (BPS-16) with effect from 19.11.2019 on the basis of seniority cum fitness and there is no hurdle in the way of considering the case of appellant for granting of proforma promotion keeping in view the provisions of relevant section of Civil Servants Act-1973 and Rules framed there under.
- F. That the impugned actions / inactions of Respondents 1&2 not to redress the grievance of appellant and not to decide the representation of appellant within the statutory period of 90 days in spite of eligibility and seniority cum fitness is against law, arbitrary, malafide, void ab-inittio, without lawful authority, without jurisdiction and of no legal effects qua the rights of appellant.
- G. That the appellant is entitled for equal treatment of law under the provisions of fundamental rights guaranteed under the Constitution but the appellant has met out discriminated treatment at the hands of office of respondent.
- H. That it is the legal and moral obligations of office of respondents 1&2 to decide the representation within reasonable time, with reason and to communicate the result of departmental appeal to the appellant but he failed to do so.
- I. That provisions of Article-4 of the constitution provide constitution guarantee to the peoples and citizens that the executive cannot take their rights of life, liberty and property without legal justification but appellant has been deprived by

*Qum*

the respondents of his legal and vested rights.

- J. That this Learned Tribunal has vast powers under the constitution and is the custodian of constitution and fundamental rights of the citizens of the country.
- K. That Counsel for Appellant may please be allowed to raise additional grounds during the course of arguments.

In view of the submissions made above, it is, therefore, humbly prayed that on acceptance this Appeal, this Honourable Tribunal may very graciously be pleased to pass an order directing the respondents 1 & 2 to grant of proforma promotion to appellant from BPS-14 to BPS-16 with effect from 19.11.2019 from the date of grant of promotion to the Junior persons i.e. respondents 3 to 5 so as to meet the ends of justice and fair play.

Any other relief deemed appropriate in the prevailing circumstances may also be granted.

Dated: 31/10/2024

Your Humble Appellant,

*Haseeb Akbar*  
**Haseeb Akbar**  
Through Counsel

*Gul Tiaz Khan Marwat*  
**Gul Tiaz Khan Marwat**  
**Advocate High Court**  
**D.I.Khan**

**CERTIFICATE:**

Certified that it is a first appeal by the appellant on the subject before this Honourable Tribunal.

*Haseeb Akbar*  
**Appellant**

**AFFIDAVIT:**

I, Haseeb Akbar Office Assistant office of the Deputy Commissioner District South Waziristan Upper, the Appellant do hereby solemnly affirm and declare on Oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

*Haseeb Akbar*  
**DEPONENT**



OFFICE OF THE ADDITIONAL POLITICAL AGENT, SOUTH WAZIRISTAN AGENCY.

No. \_\_\_\_\_ / F&P/SWA

Dated Tank the 02/10/2012

Subject: APPOINTMENT AGAINST DECEASED SONS QUOTA.

OFFICE ORDER

In pursuance of the provision contained under Rule 10 (4) of Appointment, Promotion & Transfer Rules, 1989 and as approved by the competent authority, Mr. Haseeb Akbar son of Muhammad Akbar is hereby appointed as ██████████ / UDC in BPS-9 Viz: 6200-380-17600 plus usual allowances as admissible under the rules with immediate effect against vacant post caused due to death of his father (late) Muhammad Akbar, Head Clerk of the office of Additional Political Agent, South Waziristan Agency.

He should produce his health and age Certificate from the medical Superintendent, District Headquarter Hospital Tank / DIKhan.

*Sd/-*  
ADDITIONAL POLITICAL AGENT,  
South Waziristan Agency, Tank

No. 220-25 / F&P/ SWA

Copy to:

1. The Secretary Administration, Infrastructure & Coordination, FATA Secretariat, Peshawar for information, please.
2. The Political Agent, South Waziristan Agency, Tank w/r to his approval dated 2/10/2012 for information, please.
3. The Agency Accounts Officer, South Waziristan Agency, Tank.
4. The Accountant / Head Clerk, Additional Political Agent's Office, SW Agency, Tank.
5. The Official concerned.

*11*  
ADDITIONAL POLITICAL AGENT,  
South Waziristan Agency, Tank

OFFICE OF THE DEPUTY COMMISSIONER SOUTH WAZIRISTAN TRIBAL DISTRICT.

NC. \_\_\_\_\_ /DPC  
Dated Tank the 17/02/2019.

OFFICE ORDER.

As per recommendation of Departmental Promotion Committee of District South Waziristan Tribal District in its meeting held on 14.02.2019, the following junior clerk are hereby promoted as Senior Clerk (BPS-14) with immediate effect.

Sno. #	Name of Official	Present Post	Promoted
1	Haji Abdul Samad Khan	Junior Clerk (BPS-11)	Senior Clerk (BPS-14) vice Muhammad Hamayun Khan already as office Assistant & retired.
2	Fazal Ur Rehman Khan	Junior Clerk (BPS-11)	Senior Clerk (BPS-14) vice Taj Muhammad already as office Assistant & retired.
3	Sanaullah	Junior Clerk (BPS-11)	Senior Clerk (BPS-14) vice Allman Shah already as office Assistant & retired.
4	Dost Wali	Junior Clerk (BPS-11)	Senior Clerk (BPS-14) vice Muhammad Ismail proceeded on retired. Adjusted in Khassadar Accountant Branch for the purpose of pay.
5	Muhammad Jamil Wazir	Junior Clerk (BPS-11)	Senior Clerk (BPS-14) vice Muhammad Aslam proceeded on retirement. Adjusted in Rationing Branch for the purpose of pay.
6	Attaullah Khan Marwat	Junior Clerk (BPS-11)	Senior Clerk (BPS-14) vice Muhammad Alamgir proceeded on retirement.

DEPUTY COMMISSIONER,  
South Waziristan Tribal District.

No 712-21 /DPC

Copy to:

1. The Secretary, Administration, Infrastructure and Coordination, Merged Areas Secretariat, Peshawar for information please.
2. The Commissioner, DI Khan Division DI Khan for information please.
3. The District Account Officer, SWTD for information and necessary action.
4. The Assistant Commissioner Sarwekal South Waziristan Tribal District for information and necessary action.
5. The Superintendent DC's Office at Tank for information and necessary action.
6. The Accountant DC's office at Tank for information and further necessary action.
7. The Khassadar Accountant DC's office at Tank for information and further necessary action.
8. The Rationing Assistant, DC's office at Tank for information and further necessary action.
9. Official Concerned.
10. Service Books & Personals file of the official concerned.

DEPUTY COMMISSIONER,

C  
10

**OFFICE OF THE DEPUTY COMMISSIONER, SOUTH WAZIRISTAN TRIBAL DISTRICT.**

No. 4055 /DPC

Dated Tank the 19/11/2019.

**OFFICE ORDER**

As per recommendation of Departmental Promotion Committee, District South Waziristan Tribal District in its meeting held on 15.11.2019, the following Senior Clerks are hereby promoted as Office Assistant (BPS-16) with immediate effect. However, the officials promoted will remain on probation, initially for the period of one year, under part-V probation and confirmation of APT Rules 1989:

Sr. #	Name of Official	Present Post	Promoted
1.	Haji Abdul Samad Khan	Senior Clerk (BPS-14)	Office Assistant (BPS-16) vice Muhammad Hamayun Khan already as Office Assistant & retired.
2.	Fazal Rehman Khan	Senior Clerk (BPS-14)	Office Assistant (BPS-16) vice Taj Muhammad already as Office Assistant & retired.
3.	Sanaullah	Senior Clerk (BPS-14)	Office Assistant (BPS-16) vice Aliman Shah already as Office Assistant & retired.

4056-61

No. \_\_\_\_\_ /DPC

  
**DEPUTY COMMISSIONER,**  
South Waziristan Tribal District

Copy to:

- 1) The Commissioner, DIKhan Division, D.I.Khan for information, please.
- 2) The District Accounts Officer, SWTD for information & necessary action.
- 3) The Assistant Secretary (Admin), Board of Revenue, Khyber Pakhtunkhwa, Peshawar.
- 4) The Assistant Commissioner, Sarwekai Subdivision, SWTD.
- 5) The Accountant, DC's Office, SWTD, Tank for necessary action.
- 6) Service Books & Personal file of the officials concerned.

  
**DEPUTY COMMISSIONER,**  
South Waziristan Tribal District

**BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 4935 <sup>D</sup> / 2021

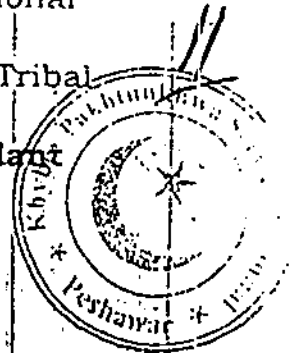
Diary No. 4830

Dated 14/4/20

Haseeb Akbar S/O Muhammad Akbar UDC office of the Additional

Deputy Commissioner (Finance & Planning) South Waziristan Tribal

District Tank. 03377504948 .....Appellant



**VERSUS**

1. Government of KPK through Chief Secretary Civil Secretariat Peshawar:
2. Secretary Home Department Government of KPK Civil Secretariat Peshawar.
3. The Senior Member Board of Revenue Peshawar.
4. The Commissioner D.I.Khan Division, D.I.Khan
5. The Deputy Commissioner South Waziristan Tribal District at Tank. ....Respondents

**APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER OF WITHHOLDING AND NON-DISPOSAL OF DEPARTMENTAL APPEAL OF THE APPELLANT BY RESPONDENT NO. 5 WITHIN THE STATUTORY PERIOD.**

Respectfully Sheweth:

- (1) That the addresses of the parties given above are sufficient for the purpose of service of the parties.
- (2) That the appellant is a citizen of Islamic Republic of Pakistan and is a permanent resident of SW and being a citizen of the Country has the rights and obligation under the constitution.
- (3) That the Appellant was appointed a JDC in BPS-09 in the office of Additional Political Agent South Waziristan Agency vide order

Signature  
Service Tribunal  
Peshawar

Code  
Registered  
to-day  
Registrar  
mitted to-day  
Registrar

28<sup>th</sup> September, 2022

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Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Sher Bahadar Khan, Additional Assistant Commissioner Latha for official respondents and learned counsel for private respondents also present.



2. After hearing learned counsel for the appellant and learned Deputy District Attorney, the only grievance of the appellant appears to be that he is not being provided seniority list containing his name. Mr. Sher Bahadar Khan, Additional Assistant Commissioner Latha is present on behalf of official respondents and undertakes that the Department will provide seniority list to the appellant containing his name within 10 days from today. The appellant is at liberty to challenge the same subject to limitation and exception if he feels himself aggrieved from the same. Disposed of accordingly. Consign.

3. Pronounced in open court in D.I.Khan and given under our hands and seal of the Tribunal this 28<sup>th</sup> day of September, 2022

*Salah Ud Din*  
(Salah Ud Din)  
Member (Judicial)  
Camp Court D.I.Khan

*Asif Masood Ali*  
Chairman  
Camp Court D.I.Khan  
Peshawar  
Peshawar Service Tribunal  
Peshawar

Date of Presentation of Application 19-10-22  
Number of Words 800  
Copying Fee 10/-  
Urgent       
Total 10/-  
Date of Completion of Copy 03-11-22  
Date of Delivery of Copy 03-11-22



**OFFICE OF THE DEPUTY COMMISSIONER,  
SOUTH WAZIRISTAN UPPER**

Phone # 0063-510364 / 510386  
Fax # 0963-510442

No. 1227 /Acctt:

Dated Tank the 17/04/2023

**OFFICE ORDER**

As per recommendations of Departmental Promotion Committee in its meeting held on 12.04.2023, the following UDC/ Senior Clerks are hereby promoted as Assistant (BPS-16) with immediate effect:

1. Mr. Haseeb Akbar, UDC (BPS-14)
2. Mr. Dost Wali, Senior Clerk (BPS-14)
3. Mr. Muhammad Jamil, Senior Clerk (BPS-14)
4. Mr. Attaullah, Senior Clerk (BPS-14)

No. 1228-34 /Acctt:

Copy to the:

1. Deputy Commissioner, South Waziristan Lower.
2. Additional Deputy Commissioner (F&P), South Waziristan Upper.
3. Assistant Commissioner, Tribal Sub Division, Sarwekai.
4. District Accounts Officer, South Waziristan.
5. Superintendent, DC office South Waziristan Upper.
6. Accountant, DC office South Waziristan Upper for necessary action.
7. Officials concerned.

DEPUTY COMMISSIONER,  
South Waziristan Upper

DEPUTY COMMISSIONER,  
South Waziristan Upper



To

The Deputy Commissioner,  
South Waziristan Lower.

F

**SUBJECT: REQUEST FOR CORRECTION IN SENIORITY LIST/PROMOTION TO THE POST OF ASSISTANT FROM 19.11.2019.**

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Most humbly with due respect it is submitted that I have been promoted to the post of Assistant BPS-16 vide DPC held in the office of the Deputy Commissioner South Waziristan Upper on 12.04.2023.

Sir, I would like to bring in your kind notice the following submissions regarding my seniority / promotion case:-

1. That I was working as Senior Clerk in Deputy Commissioner Office (Finance & Planning wing) South Waziristan since 03.10.2012.
2. That I have time and again requested for inclusion of my name in the joint seniority list of Senior Clerks (F&P wing and DG personal office) from due date; however, my name was not included in the seniority list of Senior Clerks.
3. Resultantly I was compelled to approach the court of law for the very matter and in the meanwhile, a DPC was held on 19.11.2019 by DC office South Waziristan wherein junior officials namely Sanaullah, Abdul Samad and Fazal ur Rehman were promoted to the post of Assistant BPS-16 and my name was not considered though it was my due right at that time being senior most of all.
4. That my promotion has been delayed for almost 04 years which also dented my seniority at provincial level.
5. That I have submitted a written application to the then Deputy Commissioner South Waziristan for correction in my seniority / promotion but no action was taken (copy attached).
6. The Commissioner Office DIKhan Division DIKhan has issued tentative joint seniority list of Assistants which is not shared with the officials of Deputy Commissioner offices objections; if any.
7. Now it has been learnt that final seniority list of Assistants BPS-16 is finalized and will be issued shortly.

In this regard, it is my humble request that my application may be accepted and my promotion to the post of Assistant BPS-16 may be considered from the date of DPC held on 19.11.2019 instead of 12.04.2023 as I was eligible at that time. My due rights may please be upheld before issuance of final seniority list.

Submitted for perusal / approval and onward submission to Worthy Commissioner DIKhan Division DIKhan for consideration, please.

  
Yours faithfully,  
Haseeb Akbar  
Assistant (BS-16)  
DC office SWU  
10/07/24

Copy to the:-

1. Commissioner DIKhan Division, DIKhan.
2. Deputy Commissioner, South Waziristan Upper.
3. Additional Deputy Commissioner (F&P) Wana SW-Lower.

OFFICE OF THE DEPUTY COMMISSIONER,  
SOUTH WAZIRISTAN LOWER

Ph # 0965-210748, Fax # 0965-210295, Email: dcswlower@gmail.com



No. 5051-53 /DC/SWL/Acctt

Dated Wana the 10 /07/2024

15

To

The Commissioner,  
DIKhan Division, DIKhan.

9

Subject: TENTATIVE JOINT SENIORITY LIST OF ASSISTANT / SENIOR SCALE  
STENOGRAPHERS (BPS-16) AT DIVISIONAL LEVEL AT IS STOOD ON 31-12-2023

Dear Sir,

Reference Secretary to Commissioner, DIKhan Division DIKhan office letters No.1471-74/Acctt, dated 07-05-2024 & No.1734-39/Acctt, dated 27-05-2024 on the subject noted above.

Enclosed please find herewith copy of an application / objection on tentative seniority list issued by Secretary to Commissioner DIKhan Division, DIKhan which have not been received to this office for consideration as per law / rules, please.

  
DEPUTY COMMISSIONER  
South Waziristan Lower

Endst# & Date Even:

Copy to the: -

1. Assistant Secretary (Estt), Board of Revenue, Revenue & Estate Department Khyber Pakhtunkhwa Peshawar.
2. Mr. Haseeb Akbar, Assistant (BPS-16).

  
DEPUTY COMMISSIONER  
South Waziristan Lower



**KHYBER PAKHTUNKHWA  
BAR COUNCIL**

**ADVOCATE HIGH COURT**

**GUL TIAZ KHAN**

Advocate  
bc-11-2787  
Date of issue: June 2020  
Valid upto: June 2023



Secretary  
KP Bar Council

In the event of being or acting as any other profession, service or business, the holder will not be entitled to use the card and shall remain subject to the KP Bar Council

Father's Name: MUHAMMAD HAWAZ KHAN  
Address: E-27, COMMISSIONERS COLONY NORTH  
CIRCULAR ROAD D.I. KHAN

Contact No:  
Enrolment Date LC03-July-2008  
Enrolment Date HC08-November-2010  
Place of Practice: D.I. KHAN  
Date of Birth: 01-November-1961  
Blood Group: B+ VE  
C.NIC No: 12101-5311180-1

Card No: 19150

**KHYBER PAKHTUNKHWA BAR COUNCIL**  
Bar Council of Khyber Pakhtunkhwa, Peshawar, on CP-42/11/12, 42/11/13, P.O. Box-4211114  
E-mail: kpc@kpc.org.pk, www.kpcourt.org.pk

16

**VAKALATNAMA**

IN THE COURT OF K.P.K Service Tribunal Peshawar D.I.Khan

Haseeb Akbar VERSUS Commissioner D.I.Khan

Title Service Appeal AK

I/we Haseeb Akbar

The above named Appellant hereby appoint Gul Tiaz Khan Marwat Advocate High Court D.I.Khan, in the above mentioned case to all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this court/tribunal in which the same may be tried or heard or any other proceedings out of our connected therewith.
  2. To sign and verify and file or withdraw all proceedings, petitions, appeals, affidavits, and applications for compromise or withdrawal, or for the submission to arbitration of the said case or any other documents, may be deemed necessary or advisable by them by the conduct, prosecution or defense of the said case at all its stages.
  3. To receive payments of and issue receipts for all moneys that may be or become due and payable to us during the course on conclusion of the proceeding.  
To do all other acts and things, which may deemed necessary or advisable during the course of proceedings.
- AND hereby agree:
- a. To ratify whatever advocates may do the proceedings.
  - b. Not to hold the advocates responsible if the said case be proceed ex-parte or dismissed in default in consequence of their absence from the court when it is called for hearing.
  - c. That the advocates shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains un-paid.
  - d. That advocates may be permitted to argue any other point at the time of arguments.

In witness whereof I/we have signed this vakalatnama here under the contents of which have been read/explained to me/us which is fully understood by me/us.

Date: 31/12/2024

Haseeb Akbar  
Signature of Executants (s)

Attested & Accepted:  
Gul Tiaz Khan  
Gul Tiaz Khan Marwat  
Advocate High Court D.I.Khan (KPK)  
Cell No. 0300-9092488 / 0345-9853488

( Haseeb Akbar )