


# FORM OF ORDER SHEET

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

**Appeal No.** 2452/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/11/2024	<p>The appeal of Mr. Usman Jan presented today by Mr. Muhammad Asif Yousafzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 20.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 2452/2024

Usman Jan

V/S

Govt: of KP etc.


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APPELLANT

  
Usman Jan

THROUGH:-

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
OF PAKISTAN.

  
(S. NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

&   
(HILAL ZUBAIR YOUSAFZAI)  
ADVOCATE PESHAWAR.

Room No.FR-08, 4<sup>th</sup> Floor.  
Bilour Plaza Peshawar Cantt:  
Cell # 03339103240

①

**BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR**

APPEAL NO. 2452 /2024

Usman Jan S/o Sher Muhammad, Sr. Scale Stenographer (BPS-16)  
Directorate General (Research) Livestock & Dairy  
Development Khyber Pakhtunkhwa, Peshawar.

(APPELLANT)

VERSUS

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Livestock and Dairy Development Department, Civil Secretariat, Peshawar.
2. The Director General (Research) Livestock and Dairy Development, Khyber Pakhtunkhwa.

(RESPONDENTS)

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**APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974  
AGAINST NOT CONSIDERING THE APPELLANT FOR  
PROMOTION SUPERINTENDENT(BPS-17) FROM HIS DUE  
DATE AND NOT TAKING ANY ACTION ON THE APPEAL  
OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90  
DAYS.**

**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL THE INACTION AND NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT BY THE RESPONDENTS MAY BE DECLARED AND ILLEGAL UNLAWFUL, AGAINST THE PRINCIPLE OF JUSTICE WITH FURTHER DIRECTION TO THE RESPONDENTS TO CONSIDER THE APPELLANT FOR PROMOTION AS SUPERINTENDENT WITH EFFECT FROM HIS DUE DATE AND IN LIGHT OF NOTE OF DPC OBSERVATIONS WITH ALL BACK BENEFITS . ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF THE APPELLANT.

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant joined the Respondent Department as Junior Scale Stenographer BPS-14 on 15.06.2015 and has been performing his duties upto the entire satisfaction of his superior and has never given a chance of complaint to his high ups and the service record of the appellant is the evidence of his dedication and professionalism. **Copy of the appointment order is attached annexure-A.**
2. That the appellant was promoted from (Jr. Scale Stenographer BPS-14 to Senior Scale Stenographer BS-16 on 19.05.2021. Presently the appellant at serial NO.01 of the seniority list. **Copy of promotion order and seniority list is attached as Annex-B, B1 .**
3. That on 23.12.2023 a DPC was convened to the post of superintendent BPS -17 the committee observed that 02 vacant post of superintendent are available, one post falls to the share of office assistant BPS-16 and the other falls in the share of Senior Scale Stenographer BPS-16. However, incumbent of Senior Scale Stenographer is not available therefore the same may also be filled from the eligible Assistant (BS-16). However upon the recommendation of section officer (R-IV) Establishment, both the post falls in the share /quota of senior scale stenographer. The Sr. Scale lengthy of service by less then three years, thus he is eligible for acting charge appointment. Therefore, he may be recommended on acting charge appointment. The second lefty over post may be filled from other clause i.e (Assistant) as per proviso in the Service Rule.

**Copy of minutes of the meeting & Service Rules are attached as Annex-C, C1.**

4. That the appellant being an eligible candidate for the promotion on acting charge basis and was waiting for such result as observed ,but the appellant got no response, finally the appellant filed departmental appeal on 12.08.2024 but the same was not responded within the statutory period of 90-days. **Copy of departmental appeal is attached as Annex-D.**
5. That having no other remedy against the acts/omissions of the respondents and the appellant is constrained to come to this august Tribunal on the following grounds amongst the others.

**GROUNDS:-**

- A) That the inaction of the respondents and not considering the appellant for promotion to BPS-17 as per observation and not taking any action on the appeal of the appellant within statutory period of 90 days are against the law, facts, norms of justice, principles governing acting charge promotion cases. Therefore, such inaction of the respondents is not tenable under the law.
- B) That not responding the departmental appeal within statutory period of 90 days is against the Judgment of Supreme Court as 2011-SCMR 01, as such the impugned inaction of the respondent is illegal, unlawful, without and lawful authority, thus calling interference of this learned Tribunal.
- C) That according to the observations made by SO (R-IV) Establishment Department the senior scale stenographer of the cadre is short of required length of service by less than three years, he is eligible for acting charge appointment. But despite to clear therefore observation no further action was taken.
- D) That as per KP Civil Servant APT Rules, 1989 Rule-9 (1) **(Appointment of acting charge basis or current charge basis)** *"where the appointing authority considered it to be in the public interest to fill a post reserved under the rules for departmental promotion and the most senior civil servant belonging to the cadre or service concerned, who is otherwise eligible for promotion, not possess the specified length of service the authority may appoint him to that post on acting charge basis"*.
- E) That it was the right of the appellant to be promoted on acting charge basis and the same was also observed by the Apex Court in its judgment reported as 2024-SCMR-1341.
- F) That the appellant was not treated according to the law and rules and has been deprived from his legal right of promotion.
- G) That appellant was not considered for promotion inspite of observation of SO(R-IV) Establishment Department without giving any reason, and as such the acts/omissions of the respondents are against the spirit of Article-2A, 4, 9, 25 & 38 of the Constitution.
- H) That the appellant being eligible candidate for promotion and was not considered for promotion which is totally against the law, norms of


justice and Superior Court Judgments wherein it has held that no one should be suffered for the fault of others.


- D) That the appellant has been made to suffer for belated his promotion in an illegal and fanciful manner, which is not permissible in the eyes of law.
- J) That the appellant has not been dealt with in accordance with law rules and principles laid down by Superior Courts.
- K) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.


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

APPELLANT  
  
 Usman Jan

**THROUGH:-**

  
 (M. ASIF YOUSAFZAI)  
 ADVOCATE SUPREME COURT  
 OF PAKISTAN.

  
 (S. NOMAN ALI BUKHARI)  
 ADVOCATE HIGH COURT  
 OF PESHAWAR.

  
 &  
 (HILAL ZUBAIR YOUSAFZAI)  
 ADVOCATE PESHAWAR.

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**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2024

Usman Jan

V/S

Govt: of KP etc.

**CERTIFICATE:**

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

  
DEPONENT


**LIT OF BOOKS:**


1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.

  
APPELLANT

Usman Jan

**THROUGH:-**

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT  
OF PAKISTAN.

  
(S. NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT  
OF PESHAWAR.

  
&  
(HILAL ZUBAIR YOUSAFZAI)  
ADVOCATE PESHAWAR.

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**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2024

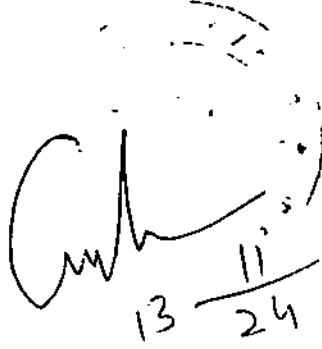
Usman Jan

V/S

Govt: of KP etc.

**AFFIDAVIT**

I, Usman Jan S/o Sher Muhammad, Senior Scale Stenographer (BPS-16) Directorate General (Research) Livestock & Dairy Development Khyber Pakhtunkhwa, Peshawar (Appellant), do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

  
13/11/24

  
**DEPONENT**

Usman Jan



DIRECTORATE GENERAL (RESEARCH)  
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT  
KHYBER PAKHTUNKHWA, PESHAWAR  
Ph #: 091-9210218, 091-9210219  
Fax #: 091-9210220

Annex-I

ORDER

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, vide letter No. PSC/SR-1024414 dated 24-03-2015 Mr. Usman Jan S/O Sher Muhammad Mohmand Agency is hereby appointed against the vacant post of Junior Scale Stenographer (BPS-14) at Veterinary Research Institute, Peshawar (Rt. 5000-610-26300) plus usual allowances as admissible under the rules, on regular basis with immediate effect with the following terms & conditions:-

TERMS AND CONDITIONS:

1. He will be governed by such Rules, Regulations, Orders and Ordinances etc relating to appointment, Promotion, Transfer, Leave, TA, Medical Attendance, Seniority Efficiency & Discipline and Conduct as have been/may be prescribed by the Government for the category of Government Servants of their status, from time to time and as interpreted by the Government.
2. His service will be considered regular and is entitled to General Provident fund in such a manner and at such rates as may be prescribed by the government under Khyber Pakhtunkhwa civil Servants (Amendments) Act, 2012.
3. His service will be on probation for a period of one year extendable for another one year and will be liable to termination on one month's notice from either side. In case of resignation without notice, his one month's pay/allowances shall be forfeited.
4. The appointee should join his post within 30 days of the issue of this order.
5. His appointment will be subject to medical fitness and verification of antecedent/character from Police Department.
6. He will be governed under such rules and regulations as may be issued from time to time by the Government.
7. His services can be terminated at any time, incase his performance is found unsatisfactory during probationary period. In case of misconduct, he will be proceeded against under the Khyber Pakhtunkhwa, Government (Efficiency & Disciplinary) Rules 2011 and the rules framed from time to time.
8. His pay will be fixed under the normal rules of the Government of Khyber Pakhtunkhwa, on joining his duty.
9. His appointment will be cancelled and he will have to refund all emoluments drawn from Government ex-chequer if at any stage his documents are found Fake/Wogus.
10. He will have to produce medical certificate from the medical superintendent.
11. No TA/DA will be allowed to the appointee for joining his duty.

If the above terms & conditions of the appointment are acceptable to him, he should immediately submit his arrival report to the undersigned for duty within 30 days from the date of issue of this order.

(DR AHMAD NAVEED)  
Director General (Research)

No. DG (Res)/L&DD/Est-II (95)/2015

2871-95

Dated Peshawar the 15/06/2015

Copy of the above is forwarded for information and necessary action to:-

1. The Secretary, Government of Khyber Pakhtunkhwa, Agriculture, Livestock & Cooperative Department w/r to the letter No. SO (LFC) AD-E-1(341)2014 dated 21.04.2015.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Superintendent (D&A), Veterinary Research Institute, Peshawar.
4. Mr. Usman Jan S/O Sher Muhammad, P/O Yakka Tool House No. 18 Street No. 04 Mohallah Shad Bagh Colony Zargar Abad, Peshawar for compliance.
5. Personal file of the official concerned.
6. Office order file.

(DR AHMAD NAVEED)  
Director General (Research)



**DIRECTORATE GENERAL (RESEARCH)  
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT  
KHYBER PAKHTUNKHWA, PESHAWAR**



Peshawar, Khyber Pakhtunkhwa, Pakistan  
Directorate General (Research) Livestock & Dairy Development

Phone: 9210210,  
9210220

Facebook: @livestockresearchpk  
Twitter: @kpr\_research  
Website: www.kpr.gov.pk

B

**ORDER**

No. DG(Res)/L&DD/Est-II(114)/2020/Vol-V/: On the recommendation of the Departmental Promotion Committee (DPC) meeting held at 10:00 AM on 18.05.2021, Mr. Usman Jan, Junior Scale Stenographer (BPS-14) of Directorate General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar is hereby promoted to the post of Senior Scale Stenographer (BPS-16) on regular basis with immediate effect. He will be on probation for a period of one year extendable for another one

Consequent upon the above, he is posted against the vacant post of Senior Scale Stenographer (BPS-16) at Directorate General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar in the best public interest.

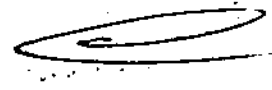
Director General  
(Research)

No. DG(Res)/L&DD/Est-II(114)/2020/Vol-V/ 3894-3900 Dated Peshawar the 19/05/2021

Copy of the above is forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Veterinary Research Institute, Khyber Pakhtunkhwa, Peshawar.
3. The Account Officer, Directorate General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar.
4. The Incharge Information Technology Cell.
5. Mr. Usman Jan, Senior Scale Stenographer, Directorate General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar.
6. Personal file of the official.
7. Office order file.

Director General  
(Research)



Director General  
(Research)

Each As above.  
 correspondence.  
 it will be considered that the seniority list is correct and will be notified without any further  
 (15) fifteen days to notify final seniority list. In case no response is received within the stipulated period,  
 Furthermore, it is to inform you that the same may be returned to the undersigned within  
 objection with reason supported by rules in writing to this office.  
 In case any official has objection regarding the seniority list, he should communicate his  
 acknowledgement, that he has no objection to the seniority list.  
 The tentative seniority list has to be signed by every official of respective end, for

5.	Junior Clerk (BPS-11)	8	Junior Laboratory Technician (BPS-09)
4.	Junior Scale Stenographer (BPS-14)		
3.	Senior Clerk (BPS-14)		
2.	Senior Scale Stenographer (BPS-10)	7	Laboratory Technician (BPS-12)
1.	Computer Operator (BPS-16)	6	Laboratory Supervisor (BPS-16)

Enclosed find herewith tentative seniority lists of the following Non-bazetted entries.  
 Reference to the subject noted above

**TENTATIVE SENIORITY LIST OF NON-GAZETTED EMPLOYEES OF  
 LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT (RESEARCH WING),  
 KHAYBER PAKHTUNKHWA**

Subject:

16	Planning Cell, Directorate General Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar		
1-8	Veterinary Research & Disease Investigation Centers, Abbottabad, Swat, Kohat, D.I Khan, Chitral and Feroz & Mouth Disease Vaccine Research Center, Khyber Pakhtunkhwa, Peshawar.	9-15	Livestock Research & Development Stations, Swat, Dir Lower, Poultry Research Institute, Jaba Manshera, Goat Production Research Station Chabagh Swat
2	The Director, Veterinary Research Institute, Khyber Pakhtunkhwa, Peshawar		The Director, Livestock Research & Development, Khyber Pakhtunkhwa, Peshawar.

To

No. DG(Res)M&D/ESI-II(206)Y-IV/2021/1583-864 Dated Peshawar the 13/12/2022

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Director General Livestock & Dairy Development Department  
 Khayber Pakhtunkhwa, Peshawar



**DIRECTORATE GENERAL (RESEARCH)  
 LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT  
 KHAYBER PAKHTUNKHWA, PESHAWAR**



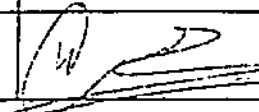
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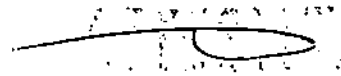
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**TENTATIVE SENIORITY LIST OF SENIOR SCALE STENOGRAPHER (BPS-16)  
OF LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT, (RESEARCH WING) KHYBER PAKHTUNKHWA**

S. #	Name of Official with academic qualification	Date of Birth and Domicile	Date of 1 <sup>st</sup> entry into Government Service	Regular appointment/promotion to present posts			Remarks
				Date	BPS	Method of Recruitment	
1.	Mr. Usman Jan. DBA/ B.Com/ MBA	04-03-1993 Tribal District Mohmand	15-06-2015	19.05.2021	16	By Initial Recruitment	



C U

- not yet no

MINUTES OF THE DEPARTMENTAL PROMOTION COMMITTEE MEETING HELD ON  
26.12.2023 AT 11:00

AGENDA 1: PROMOTION OF ASSISTANT (BS-16) TO THE POST OF  
SUPERINTENDENT (BS-17) DIRECTORATE GENERAL  
FISHERIES, KHYBER PAKHTUNKHWA.

AGENDA 2: PROMOTION OF ASSISTANT (BS-16) TO THE POST OF  
SUPERINTENDENT (BS-17) DIRECTORATE GENERAL  
(RESEARCH) LIVESTOCK & DAIRY DEVELOPMENT,  
PESHAWAR.

ADDITIONAL AGENDA ITEM:

PROMOTION OF ASSISTANT RESEARCH OFFICER/  
EXTENSION FIELD OFFICER (BS-16) TO THE POST OF  
ASSISTANT DIRECTOR FISHERIES (BS-17) DIRECTORATE  
GENERAL FISHERIES.

A meeting of the Departmental Promotion Committee was held under the Chairmanship of Secretary Livestock, Fisheries & Cooperative Department on 26.12.2023 at 11:00 AM, on the above agenda item. The following attended;

- |   |        |
|---|--------|
| 1. Dr. Muhammad Ijaz Ali,<br>Director General L&DD (Research Wing)                            | Member |
| 2. Muhammad Arshad Aziz,<br>Director General Fisheries  | Member |
| 3. Mr. Tanveer Ahmad,<br>Deputy Secretary-1, Livestock<br>Fisheries & Cooperative Department. | Member |
| 4. Mr. Momin Khan<br>Section Officer (SR-1)<br>Finance Department.                            | Member |
| 5. Mr. Abdul Qadeem,<br>Section Officer (SOR-VI)<br>Establishment Department.                 | Member |

The meeting started with the recitation from the Holy Quran. The chair welcomed the Director General, Fisheries, to brief the forum Regarding Agenda item No. 1. The Director General was apprised that there are total Fourteen (14) sanctioned posts of Superintendent in the Directorate General of Fisheries /Merged Districts out of which Two (2) posts are vacant. The posts are required to be filled in by following method of promotion;

by promotion, on the basis of Seniority-cum-fitness from among those employees with at least five-years' service as such; and

by promotion on the basis of Seniority-cum-fitness from among those employees with at least five-years' service as such.

03. The Director General, Fisheries stated that out of Two (02) vacant posts one falls to the share of Assistant (BS-16), while other falls to the share of Senior Scale Stenographers (BS-16). However, incumbent of Senior Scale Stenographer is not available therefore the same may also be filled from the eligible Assistant (BS-16). Representative of Establishment department stated that as no qualified Senior Scale Stenographer is available therefore no recommendation of Assistant can be made against the quota of Senior Scale Stenographer.

04. The service record of the Assistants included in the panel were discussed as follow;

S.No.	Name of official	Recommendations of the DPC
01.	Mr. Ajmal Khan	His date of birth is 15.10.1966. He joined government service on 03.03.1990 as Junior Clerk. He was promoted to the post of Assistant on 18.04.2018 on regular basis. No inquiry is pending against him. His PER dossier is complete. His service record up to 2022 is generally good.  The Committee recommended him for promotion to the post of Superintendent (BS-17) on regular basis. He will be on probation for a period of one (01) year.

**AGENDA ITEM NO. 2:**

The Director-General, (Research), L&DD was asked to brief the forum regarding agenda item No 2. The committee was apprised that there are Ten (10) sanctioned posts of Superintendent (BS-17) in Livestock & Dairy Development (Research), out of which Two (02) are lying vacant. The posts are required to be filled in by following method of promotion -

- a) Seventy Five percent (75%) by promotion, on the basis of Seniority-cum-fitness from amongst the Assistants with at least five-years' service as such; and
  - b) Twenty Five percent (25%) by promotion, on the basis of Seniority-cum-fitness from amongst the Senior Scale Stenographers with at least five-years' service as such.
- It is noted that if no suitable official is available in one clause, promotion will be made from the other clause of the above officials.

06. The Director-General stated that both the post falls to the share of Senior Scale Stenographers as per service rules proviso, if no suitable official is available in one clause, promotion will be made from the other clause of the officials. Therefore, due to incomplete service record, Assistant does not meet the criteria for regular promotion, hence being not eligible for promotion in stenographer may be filled through assistants. However, after completion of the Assistant quota will be observed as per rules.

07.

The service record of the Assistants/officials included in the panel were discussed

as follow;

S.No.	Name of official	Recommendations of the DPC
01.	Mr. Kamal Badshah	<p>His date of birth is 06.04.1968. He joined government service on 13.12.1994 as Junior Clerk. He was promoted to the post of Assistant on 13.12.2016 on regular basis. No inquiry is pending against him. His PER dossier is complete. His service record up-to 2022 is generally good.</p> <p>The Committee recommended him for promotion to the post of Superintendent (BS-17) on regular basis. He will be on probation for a period of one (01) year.</p>
02.	Mr. Amin Jan.	<p>His date of birth is 11.03.1975. He joined government service on 13.12.1994 in BS-07. He was promoted to the post of Assistant on 25.05.2016 on regular basis. No inquiry is pending against him. His PER dossier is complete. His service record up-to 2022 is generally good.</p> <p>The Committee recommended him for promotion to the post of Superintendent (BS-17) on regular basis. He will be on probation for a period of one (01) year.</p>

**ADDITIONAL AGENDA ITEM:** The Director General Fisheries has requested the committee that additional agenda item may also be considered. Working papers were circulated amongst the committee and the forum was apprised that there are Forty-three (43) sanctioned posts of Assistant Director Fisheries (BS-17) in Directorate General Fisheries, Khyber Pakhtunkhwa, out of which Sixteen (16) are lying vacant. The posts are required to be filled in by following method: -

- Fifty percent (50%) by promotion, on the basis of Seniority-cum-fitness from amongst the Assistant Research Officer/Extension Field officers having Bachelor's Degree from a recognized university with at least five-years' service as such; and
- Fifty percent (50%) by initial recruitment.


09. The Director General Fisheries stated that Mr. Abdul Awal and Muhammad Israil (both already appointed as Assistant Director Fisheries (BS-17) on acting charge basis on 05.08.2021 due to lack of prescribed length of service i.e. 5 years) have now completed the prescribed length of service and are eligible for regular promotion to the post of Assistant Director Fisheries (BS-17). Service record of the officials included in the panel were discussed as follow;

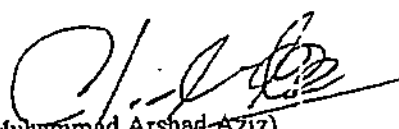
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S.No.	Name of official	Recommendations of the DPC
01.	Mr. Abdul Awal	<p>His date of birth is 24.04.1969. He joined government service on 06.06.1995 as Assistant Warden Fisheries. He was promoted to the post of Assistant Director Fisheries on 05.08.2021 on acting charge basis. Now his length of service is completed and eligible to be promoted on regular basis. No inquiry is pending against him. His PER dossier is complete. His service record up-to 2022 is generally good.</p> <p>The Committee recommended him for promotion to the post of Assistant Director Fisheries (BS-17) on regular basis. He will be on probation for a period of one (01) year.</p>
02.	Muhammad Israil.	<p>His date of birth is 03.12.1968. He joined government service on 28.08.1990 as Fisheries Supervisor. He was promoted to the post of Assistant Director Fisheries on 05.08.2021 on acting charge basis. Now his length of service is completed and eligible to be promoted on regular basis. No inquiry is pending against him. His PER dossier is complete. His service record up-to 2022 is generally good.</p> <p>The Committee recommended him for promotion to the post of Assistant Director Fisheries (BS-17) on regular basis. He will be on probation for a period of one (01) year.</p>

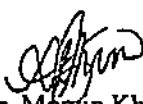
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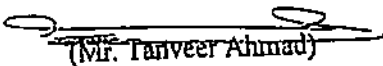
10. Meeting ended with a vote of thanks from and to the chair.


  
 (Dr. Muhammad Ijaz Ali)  
 DG L&DD (Research)

  
 (Muhammad Arshad Aziz)  
 Director General Fisheries

  
 My details (Mr. Abdul Qadeem)  
 note for Section Officer (SOR-VI)  
 Establishment Department  
 grade class  
 10-20 are recorded  
 over leaf

  
 (Mr. Moin Khan)  
 Section Officer (SR-I)  
 Finance Department  
 Agreed with  
 the remarks  
 representative  
 of Estt. Deptt  
 vide page 5, 1

  
 (Mr. Tanveer Ahmad)  
 Deputy Secretary-I, Livestock  
 Fisheries & Cooperative Department

  
 (Muhammad Israr)  
 Secretary to Govt. of Khyber Pakhtunkhwa  
 Livestock, Fisheries & Cooperative Department







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GOVERNMENT OF KHYBER PAKHTUNKHWA  
AGRICULTURE, LIVESTOCK & COOPERATIVE  
DEPARTMENT

e I  
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Dated Peshawar the 20<sup>th</sup> December, 2017

# NOTIFICATION

NO.SO(LFC)AD-EI(236)/2017:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous notifications issued in this behalf, the Agriculture, Livestock and Cooperation Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column No. 3 to 5 of the Appendix to this Notification, which shall be applicable to the posts specified in column No. 2 of the said Appendix born in the Khyber Pakhtunkhwa Directorate General (Research) Livestock and Dairy Development and its subordinate offices.

## APPENDIX

### PART-I

#### (PROFESSIONAL AND PARA PROFESSIONAL STAFF)

S.No.	Nomenclature of the post.	Minimum qualification prescribed for appointment by initial recruitment.	Age limit for initial recruitment.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Director General. (BPS-20)			By promotion, on the basis of seniority-cum-fitness, from amongst the Directors Livestock Research and Development, Directors Veterinary Research Institute, Principal Research Officers, Directors, Regional Directors and Station Directors having ten years service in BPS-19 or seventeen years service in BPS-17 or above and having five Research Publications.
	Director Livestock Research and Development, Director Veterinary Research Institute. (BPS-19)			By transfer, from amongst the Principal Research Officers, Station Directors and Regional Directors.

(M.IRFAN 20/12/2017)

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20/12/17



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 AGRICULTURE LIVESTOCK & COOPERATIVE  
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S.No.	Nomenclature of the post.	Minimum qualification prescribed for appointment by initial recruitment.	Age limit for initial recruitment.	Method of recruitment.
3.	Principal Research Officer, Director, Regional Director or Station Director. (BPS-18)			By promotion from amongst the Research Officers, Farm Managers, Farm Feed Mill Managers, Administrative Officers and Biochemists having at least Second Class Degree in Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences from a recognized University with two Research Publications and valid registration with Pakistan Veterinary Medical Council, after at least Second Class Degree in Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences from a recognized University, having three years experience as such.
4.	Senior Research Officer. (BPS-18)	(i) At least Second Class Ph.D Degree, in Veterinary, Animal, Poultry Sciences, Microbiology, Biochemistry, Biotechnology or Molecular Biology from a recognized University with two Research Publications, after at least Second Class Degree in Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences from a recognized University; or  (ii) At least Second Class M.Sc (Hons), M.Phil. or M.S Degree in Veterinary, Animal, Poultry Sciences, Microbiology, Biochemistry, Biotechnology or Molecular Biology from a recognized University with two Research Publications and Valid registration with Pakistan Veterinary Medical Council, after at least Second Class Degree in Doctor of Veterinary Medicine or equivalent qualification from a recognized University, having three years experience as such.	28-45 years.	(a) Seventy five percent, by promotion, on the basis of seniority and fitness, from amongst the Research Officers, Farm Managers, Farm Feed Mill Managers, Administrative Officers and Biochemists having at least Second Class Degree in Doctor of Veterinary Medicine or equivalent qualification in Veterinary Sciences from a recognized University with two Research Publications and valid registration with Pakistan Veterinary Medical Council having five years service as such; and (b) Twenty five percent, by initial recruitment.

(M.IRFAN 20/12/2017)



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PART-II  
MINISTERIAL AND OTHER SUPPORTING STAFF

Sl. No.	Nomenclature of the post.	Minimum qualification prescribed for appointment by initial recruitment.	Age limit for initial recruitment.	Method of recruitment.
1.	2.	3.	4.	5.
24.	Estate Manager, Procurement Officer, Superintendent or Account Officer. (BPS-17)	-----	-----	(a) Seventy five percent, by promotion, on the basis of seniority-cum-fitness, from amongst the Assistants with at least five years service as such and (b) <input checked="" type="checkbox"/> twenty five percent, by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Scale Stenographers with five years' service as such: Provided that if no suitable Official is available in one clause promotion will be made from the other clause of the above Officials.
25.	Assistant (BPS-16)	At least Second Class Bachelor's Degree or equivalent qualification from a recognized University.	21-32 years.	(a) Seventy five percent, by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with five years' service as Junior and Senior Clerk; and (b) Twenty five percent, by initial recruitment.
26.	Senior Scale Stenographer. (SPS-16)	-----	-----	By promotion, on the basis of seniority-cum-fitness, from amongst Stenographers having five years service as such.
27.	Computer Operator. (BPS-16)	(i) At least Second Class Bachelor's Degree in Computer Science, Degree in Information Technology (BCS or BIT four-years) or equivalent qualification from a recognized University; or (ii) At least Second Class Bachelor's Degree or equivalent qualification from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.	21-32 years.	By initial recruitment.
28.	Senior Clerk. (BPS-14)	-----	-----	By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks and Store Keepers with five years' service as such. Note: for the purpose of promotion, a joint seniority list of Junior Clerks and Store Keepers shall be maintained.

(M. IRFAN 20/12/2017)



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AGRICULTURE LIVESTOCK & COOPERATIVE  
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S.No.	Nomenclature of the post.	Minimum qualification prescribed for appointment by initial recruitment.	Age limit for initial recruitment.	Method of recruitment.
1.	2.	3.	4.	5.
28	Stenographer. (BPS-14)	(i) At least Second Class Intermediate Certificate or equivalent qualification from a recognized Board; (ii) A speed of fifty words per minute in short-hand in English and thirty-five words per minute in Typing; and (iii) Knowledge of computer in using, MS-Word and MS-Excel.	18-32 years	By initial recruitment.
39	Junior Clerk. (BPS-11)	(i) At least Second Class Intermediate Certificate or equivalent qualification from a recognized Board; and (ii) A speed of thirty words per minute in typing.	18-32 years.	(a) Thirty three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Daffaris, Naib Qasids, Chowkidars, Field Workers, Grass Cutters, Packers, Shepherds, Ploughmen, Animal Attendants, Cattle Attendants, Irrigation Attendants, Gawalas, Head Gawalas, Sweepers, Malis, Gardeners, Milk Men, Feed Mill Labours, Cook, Attendants and Shed Attendants having Secondary School Certificate or equivalent qualification from a recognized Board with two years service as such; and (b) sixty seven percent by initial recruitment Note: For the purpose of promotion, there shall be maintained a joint seniority list of the Daffaris, Naib Qasids, Chowkidars, Field Workers, Grass Cutters, Packers, Shepherds, Ploughmen, Animal Attendants, Cattle Attendants, Irrigation Attendants, Gawalas, Head Gawalas, Sweepers, Malis, Gardeners, Milk Men, Feed Mill Labours, Cook, Attendants and Shed Attendants with reference to the dates of their acquiring the Secondary School Certificate or equivalent qualification. Provided that: (i) if two or more officials have acquired the Secondary School Certificate or equivalent qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; and (ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.

(M.IRFA/ 20/12/2017)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
 AGRICULTURE, LIVESTOCK & COOPERATIVES  
 DEPARTMENT

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Sd/-  
 SECRETARY TO  
 GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
 AGRICULTURE, LIVESTOCK AND  
 COOPERATION DEPARTMENT

End of Even No & Date

Copy of the above is forwarded to the:-

1. Additional Chief Secretary, F&T6 Secretariat, Warak P, Peshawar.
2. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
3. Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Secretary to Government of Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Government of Khyber Pakhtunkhwa, Peshawar.
6. Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
7. Director General (Research), Livestock & Dairy Development, Peshawar.
8. Manager Government Printing Press, Peshawar.
9. PS to Special Assistant to Chief Minister for Livestock & Fisheries, Khyber Pakhtunkhwa.
10. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
11. PS to Secretary, Agriculture, Livestock & Cooperatives Department.
12. Web Administrator for uploading on the official website of Agriculture, Livestock & Cooperatives Department.

*(Handwritten signature)*

(DR MIR AHMAD KHAN)  
 SECTION OFFICER (LIVESTOCK, FISHERIES & COOPERATIVES)  
 AGRICULTURE, LIVESTOCK & COOPERATIVE DEPARTMENT  
 PH: 091-9210973

*(Handwritten signature)*

The Secretary,  
Livestock & Dairy Development Department,  
Khyber Pakhtunkhwa.

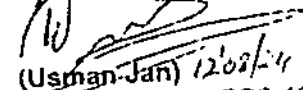
D/21

Subject: - REQUEST FOR PROMOTION ON ACTING CHARGE BASIS TO THE  
POST OF SUPERINTENDENT (BPS-17).

Respected Sir,

1. I was appointed as Junior Scale Stenographer (BPS-14) through Public Service Commission, Khyber Pakhtunkhwa on 16-06-2015 in Directorate of Livestock & Dairy Development Department (Annex-I).
2. I was promoted to the post of Senior Scale Stenographer (BPS-16) on 19-05-2021 (Annex-II).
3. The post of Superintendent (BPS-17) which is lying vacant in Directorate since long and falls to the promotion quota reserved for Senior Scale Stenographer. According to the Department Service Rules, 2020, 25% promotion quota is reserved for promotion amongst Senior Scale Stenographers (BPS-16) having five years service as such (Annex-III).
4. Now, the Department is going to make some amendments in the Service Rules, 2020 and forwarded the case for examination of the Regulation Wing, Establishment & Administration Department. Wherein, amendments include abolition of 25% quota reserved for promotion of Senior Scale Stenographers (BPS-16).
5. By abolition of ibid quota, the undersigned will suffer by losing his seniority, whereas he is reflected at Serial No. 01 (on top) of Final Seniority of Senior Scale Stenographers (BPS-16) as stood on 23-12-2022. (Annex-IV)
6. The undersigned has already completed three year service and being senior most on his seniority ibid and eligible to be promoted to the post of Office Superintendent (BPS-17) on the acting charge basis under the existing rules.
7. It is, therefore requested that being senior most on my seniority, I may be promoted to the post of Office Superintendent (BPS-17) on the acting charge basis under the existing rules, please.

Yours faithfully,

  
(Usman-Jan) 12/02/24  
Senior Scale Stenographer (BPS-16)  
PMDVRC

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VAKALAT NAMA

NO. \_\_\_\_\_ /2024

IN THE COURT OF Kp Sarake Tribunal, Peshawar

Usman Jan

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Dg Liu Stork

(Respondent)  
(Defendant)

I/We, Usman Jan

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court of Pakistan & Syed Noman Ali Bukhari, Advocate High Court & Hilal Zubair Advocate** 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 costs.

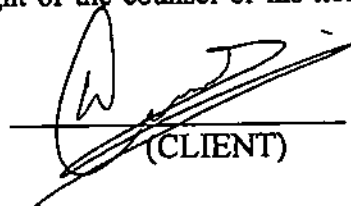
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.


AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

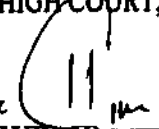
Dated \_\_\_\_\_ /2024

  
(CLIENT)

ACCEPTED

  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT,  
OF PAKISTAN.  
(BC No. 10-7327)

  
(S. NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

  
&  
HILAL ZUBAIR  
Advocate

OFFICE:

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell No. 0302-5548451  
0333-9103240  
0306-5100438