


# FORM OF ORDER SHEET

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

Appeal No. 2494/2024

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 19/11/2024                | <p>The appeal of Mr. Muhammad Shareef presented today by Mr. Zartaj Anwar Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p><br/>REGISTRAR</p> |

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 2194 /2024

**Muhammad Shareef** Assistant (BPS-16) Center for  
intellectuality & Physically Challenge Children Karak.

(Appellant)

VERSUS

Secretary to Govt of Khyber Pakhtunkhwa, Zakat, Ushr, Social  
Welfare, Special Education & Woman Empowerment Khyber  
Pakhtunkhwa Peshawar and others

..... Respondents

**INDEX**

| S. NO | Description of documents                           | Annexure | Page No |
|-------|--|----------|---------|
| 1     | Memo of Appeal + Affidavit                         |          | 1- 7    |
| 2     | Copy of notification dated 29.09.2019              | A        | 8- 14   |
| 3     | Copy of the seniority list and detail vacant posts | B & C    | 15- 19  |
| 4     | Copy of the departmental appeal                    | D        | 20-21   |
| 5     | Copy of the rules                                  | E        | 22-23   |
| 6     | Other documents                                    |          | 24-25   |
| 7     | Vakalatnama  |          | 26-     |

Appellant

Through

  
**ZARTAJ ANWAR**

Advocate Supreme Court  
Of Pakistan

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Peshawar Cantt.

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**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 2494/2024

**Muhammad Shareef Assistant (BPS-16) Center for  
intellectuality & Physically Challenge Children Karak.**

**(Appellant)**

VERSUS

1. Secretary to Govt of Khyber Pakhtunkhwa, Zakat, Ushr, Social Welfare, Special Education & Woman Empowerment Khyber Pakhtunkhwa Peshawar.
2. The Director Social Welfare, special Education & women Empowerment Khyber Pakhtunkhwa Peshawar.

**(Respondents)**

**Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, whereby not promoting the appellant to the post of Superintendent BPS-17 against which the appellant filed his departmental appeal vide dated 19.07.2024 which is not yet respondent even after the lapse of statutory period of 90 days.**

**Prayer in appeal:**

**On acceptance of this appeal the appellant may kindly be declared fit and eligible for the post Superintendent BPs-17 according to the rules, eligibility for the post of Superintendent BPS-17, and necessary direction may also be issued the respondents that the appellant may kindly be promoted to the post of Superintendent from the date when become eligible for promotion to the post of Superintendent BPS-17, the reluctance of the respondents by not promoting the appellant is illegal, unlawful and without lawful authority**

**Or any other remedy which is not specifically asked for may also be awarded in favor of the appellant.**

Respectfully Submitted:

1. That the appellant is working in the respondent department on the post of Assistant (BPS-16)
2. That since his appointment the appellant is performing his duties with great zeal, devotion and to the entire satisfaction of his superiors without any complaint whatsoever regarding his performance till date.
3. That while serving in the said capacity the respondent department issued a notification on 25.09.2019 that the post of superintendent BPS-17 can be filled by promotion on basis of seniority cum fitness from amongst the Assistants and Senior Scale Stenographer with at least five years' service as such. *(Copy of notification dated 29.09.2019 is attached as annexure A).*
4. That the department issued final seniority list of Assistant BPS-16 and Senior Scale Stenographer BPS-16 on 10.08.2020, wherein the appellant was at serial No 16 in the seniority list and the respondent department have 22 vacant posts of superintendent BPS-17 . *(Copy of the seniority list and detail vacant posts are attached as annexure B & C).*
5. That the vacant posts of Superintendent BPS-17 were available in the respondent department but the respondent department did not consider the appellant for promotion on the vacant post despite of his eligibility.
6. That the being aggrieved the appellant filed a departmental appeal before the competent authority for his promotion vide appeal dated 19.07.2024 which was duly forwarded on 22.07.2024, but the same is not yet responded even after the laps of statutory period of 90 days. *(Copy of the departmental appeal is attached as annexure D).*
7. That the appellant feeling aggrieved from the acts and omission of the respondents filed this service appeal on the following grounds amongst the others:

**GROUND'S OF SERVICE APPEAL:**

- A. That the appellant has not been treated in accordance with law and hence his rights secured and guaranteed under law and constitution are badly violated.
- B. That appellant having all the requisite eligibility criteria for further promotion to the post of Superintendent BPS-17 according to the rules/quota,
- C. That according to the rules for promotion the post of Superintendent BPS-17 shall be filled on the basis of Seniority cum fitness amongst the Assistants and Senior Scale Stenographers, the appellant is under the promotion quota.
- D. That according to the rules the following criteria has been specified for promotion to the post of Superintendent BPS-17.

| S.No | Nomenclature            | Minimum Qualification for initial recruitment | age | Method of Recruitment  |
|------|-------------------------|---|-----|--|
| 10   | Superintendent (BPS-17) | ----  | --- | By promotion on the basis of seniority cum fitness from amongst the Assistant and Senior Scale Stenographers with at least five years' service as Such.<br>Note: - A joint Seniority list of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion. |

*(Copy of the rules are attached as annexure E)*

- E. That the appellant at earlier round of litigation approached to this honorable Tribunal for consideration of promotion in which the honorable tribunal directed the respondent to considered his case, upon which they turn deaf ears, the appellant was compelled to file execution petition which was also disposed of upon the misstatement of the department, whereas they declined the promotion on the basis that all the posts of Superintendent BPS-17 are pre occupied/ filled and there is no vacant post against which the appellant can be considered.
- F. That according to the budget book regarding vacancies in the social welfare and special education department, whereas there are 34 number of Budgeted positions, in which 17 positions are Vacant, which can cover up to 17 candidates who fulfilled the eligibility criteria for promotion to the post of Superintendent BPS-17.
- G. That the respondent department issued the seniority list/final way back in the year 2020 but did not exclude the promoted and retired employees and made it ambiguous to mislead this honorable tribunal, as earlier done in the first round of litigation and till date the same seniority is available within the department.
- H. That the respondent department malafidly with ulterior motive not promoting the appellant to the post of Superintendent BPs-17 to give undue benefit to their blue eyed ones and deprived the present appellant from his due right of promotion as secured and guaranteed by the constitution of Pakistan as well as the service rules of the respondent department.
- I. That the whole service career of the appellant has been put at stake as the long earned seniority maturing her right of promotion to the next scale has been blocked.
- J. That it is pertinent to mentioned here that Junior Colleagues of the appellant were promoted to the post of Superintendent BPS-17 but the same was denied to the present appellant which is illegal, unlawful and violative upon the rights of the appellant.

- K. That the appellant has not been treated as per notified gazetted rules by the respondents which deprived the appellant from her due right of seniority, promotion.
- L. That under Article 25 of the Constitution of the Islamic Republic of Pakistan 1973, all citizen are equal before law, and that no discrimination is permitted in the similarly placed citizens, thus the discrimination meted out to the appellant by not promoting the appellant is highly discriminatory and not sustainable.
- M. That the Superior Courts have repeatedly held that where a point of law is decided by the Superior Courts that cover the cases of all those civil servants who have not litigated than the good governance require that the benefit of such judgment should also be given to those who may not be parties to the litigation instead of compelling them to approach the Service Tribunal or any other forum. Reference can be made to case reported as SCMR 1996 Page 1185, 2009 SCMR Page 1, the petitioner being similarly placed are also entitled to similar treatment meted out to their counter parts.
- N. That the state is bound to ensure the elimination of all forms of exploitation and the gradual fulfillment of the fundamental principles. It is also the duties of the state to remove disparity in the income and earning of individuals under Article 37 & 38 of the Constitution.
- O. That the Hon' able Supreme Court of Pakistan in case reported as 2010-SCMR-1301, has held that in matter of seniority, promotion, rules are to be followed and where the discretion of authority is involved, then that must be exercised with fairness. It is also held in the said judgment that promoting the juniors by ignoring seniors will not advance the object of achieving good governess. It is further pointed out in the said judgment that the Constitution is the supreme law and there is no room to allow the authority to make departure from law, rules and Article 4 and 25 of the constitution.
- P. That even in latest judgment of the Hon' able Supreme Court reported as PLD 2013 (SC)-195. (Case of Anita Turab), it is held that the statutory provisions, rules, regulations which govern the matter of appointment, promotion of Civil Servants must be followed honestly and scrupulously.

- Q. That any other ground would be taken at the time of arguments with the prior permission of this honourable tribunal.

*It is, therefore, humbly prayed that On acceptance of this appeal the appellant may declared fit and eligible for the post Superintendent BPs-17 according to the rules, eligibility for the post of Superintendent BPS-17, and necessary direction may also be issued the respondents that the appellant may kindly be promoted to the post of Superintendent from the date when become eligible for promotion to the post of Superintendent BPS-17, the reluctance of the respondents by not promoting the appellant is illegal, unlawful and without lawful authority .*

Appellant

Through



**ZARTAJ ANWAR**  
Advocate Supreme Court  
Of Pakistan

&

**IMRAN KHAN**  
Advocate High Curt  
Peshawar

**Certificate**

**It is certified that no such appeal on the same matter  
has earlier been filed before this tribunal**



7

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

**Appeal No. \_\_\_\_\_/2024**

Muhammad Shareef.....**Appellant**

**VERSUS**

Secretary to Govt. of KP Zakat, Ushr, Social Welfare Special  
Education & others.....**Respondents**

**AFFIDAVIT**

I, Muhammad Shareef, Assistant (BPS-16), Center for intellectuality & Physical Challenge Children Karak, do hereby solemnly affirm and declare on oath that the contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

\_\_\_\_\_  
**DEPONENT**



GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
SOCIAL WELFARE, SPECIAL EDUCATION AND WOMEN EMPOWERMENT DEPARTMENT

NOTIFICATION

Peshawar, dated the September 23<sup>rd</sup> 2019

Ref: SOI/SWD/II/Service Rules/2019-20/320-52 In pursuance to 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 Notifications issued in this behalf, the Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to this Notification, which shall be applicable to all the posts in the strength of Directorate of Social Welfare, Special Education and Women Empowerment Khyber Pakhtunkhwa (Social Welfare Side) specified in column 2 of the said Appendix.

APPENDIX

| S.No: | Nomenclature                | Minimum qualification for initial recruitment   | Age Limit   | Method of Recruitment  |
|-------|-----------------------------|---|-------------|--|
| 1     | 2                           | 3   | 4           | 5  |
| 1     | Director (BPS-19)           |   |             | By transfer of PCS/PMS/PAS Officer of the Provincial Government.   |
| 2     | Deputy Director (BPS-18)    |   |             | By promotion, on the basis of seniority-cum-fitness, from amongst the Social Welfare Officers, Managers, Rehabilitation Officers and Assistant Directors with at least five years service as such.<br>Note: A joint seniority list of Social Welfare Officers, Managers, Rehabilitation Officers and Assistant Directors shall be maintained for the purpose of promotion. |
| 3     | Assistant Director (BPS-17) | At least Second Class Master's Degree or equivalent qualification from a recognized University. | 21-35 years | (a) Thirty per cent (30 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendent with at least three years service as such and have qualification of graduation from a recognized University; and<br>(b) Seventy per cent (70 %) by initial recruitment.  |

AD/II  
AD/BI

*Handwritten notes:*  
No. 320-52 is case for publication in Govt Gazette  
30/9

Date: 30-09-2019  
Page: 45023

18  
Annex A

|    |  |   |             |  |
|----|--|---|-------------|--|
| 4  | Manager (BPS-17)                         | At least Second Class Master's Degree in Social Work, Sociology, Anthropology or equivalent qualification from a recognized University.             | 21-35 years | (a) Ten per cent (10%) by promotion, on basis of seniority-cum-fitness, from amongst the Administrative Officers with at least three years services as such; and<br>(b) ninety per cent (90%) by initial recruitment.  |
| 5  | Rehabilitation Officer (BPS-17)          | At least Second Class Master's Degree in Social Work, Sociology, Psychology, Anthropology or equivalent qualification from a recognized University. | 21-35 years | By initial recruitment.  |
| 6  | District Officer Social Welfare (BPS-17) | —   | —           | By transfer from amongst the officers in BPS-17 of Directorate of Social Welfare, Khyber Pakhtunkhwa, on social welfare side.  |
| 7  | Social Welfare Officer (BPS-17)          | At least Second Class Master's Degree in Social Work, Sociology, Anthropology or equivalent qualification from a recognized University.             | 21-35 years | (a) Ten per cent (10%) by promotion, on the basis of seniority-cum-fitness, from amongst the Field Officers with at least five years service as such; and<br>(b) ninety (90%) by initial recruitment.  |
| 8  | Medical Officer (BPS-17)                 | —   | —           | By transfer from Health Department on deputation basis.  |
| 9  | Psychologist (BPS-17)                    | —   | —           | By transfer from Health Department on deputation basis.  |
| 10 | Superintendent (BPS-17)                  | —   | —           | By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographers with at least five years service as such.<br>Note: A joint seniority list of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion. |
| 11 | Administrative Officer (BPS-17)          | At least Second Class Master's Degree or equivalent qualification from a recognized University.   | 21-35 years | By initial recruitment.  |
| 12 | Field Officer (BPS-16)                   | At least Second Class Master's Degree in Social Work, Sociology or Anthropology or equivalent qualification from a recognized University.           | 21-35 years | By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Vocational Teachers with at least three years service as such.  |

|    |                                    |   |             |  |
|----|------------------------------------|---|-------------|--|
| 13 | Senior Scale Stenographer (BPS-16) |   |             | By promotion on the basis of seniority-cum-fitness amongst the Junior Scale Stenographers with at least service as such.   |
| 14 | Assistant (BPS-16)                 | At least Second Class Bachelor's Degree or equivalent qualification from a recognized University.   | 20-32 years | (a) Forty per cent (40 %) by promotion on the basis of seniority-cum-fitness; from amongst the last Trades with at least five years service as such;<br>(b) thirty five per cent (35 %) by promotion on the basis of seniority-cum-fitness, from amongst the Sen and Accountants with at least five years service as such;<br>(c) twenty five per cent (25 %) by initial recruitment |
| 15 | Computer Operator (BPS-16)         | (i) At least Second Class Bachelor's Degree in Computer Science, Information Technology (BIT/BCS four years) or equivalent qualification from a recognized University; or<br>(ii) at least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from the Board of Technical Education. | 21-35 years | By initial recruitment.  |
| 16 | IT Teacher Female (BPS-16)         | At least Second Class Bachelor's Degree in Computer Science, Information Technology (BIT/BCS four years) or equivalent qualification from a recognized University.  | 21-35 years | By initial recruitment.  |
| 17 | Hostel Warden (BPS-15)             |   |             | By promotion on the basis of seniority-cum-fitness amongst the Assistant Hostel Wardens having at least service as such.   |
| 18 | Instructor all Trades (BPS-14)     |   |             | By promotion on the basis of seniority-cum-fitness amongst the Instructors (Electrical), Instructors (Tailoring) and Instructors (Carpenter) with at least five years service.<br>Note: A joint seniority list of Instructors (Electrical), Instructors (Tailoring) and Instructors (Carpenter) shall be maintained for the purpose of promotion.                                    |

|    |  |  |                |  |
|----|--|--|----------------|--|
| 19 | Junior Scale<br>Stenographer<br>(BPS-14)       | (i) At least Second Division Intermediate Certificate or equivalent qualification from a recognized Board;<br>(ii) Fifty (50) words per minutes in English Short Hand and thirty (35) words per minutes in typing; and<br>(iii) knowledge of Computer in using MS Word and MS Excel. | 18-30<br>years | By initial recruitment.  |
| 20 | Senior Clerk (BPS-14)                          |  |                | By promotion, on the basis of seniority-cum-fitness, from amongst Junior Clerks with at least two years service as such.   |
| 21 | Senior Vocational<br>Teacher<br>(BPS-12)       | At least Second Division Secondary School Certificate from a recognized Board along with three years Diploma in Women Vocational from the Board of Technical Education.  | 18-32<br>years | (a) Forty per cent (40 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Needle Craft Instructors with at least five years services as such;<br>(b) Five per cent (05 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Junior Vocational Teachers with at least five years service as such;<br>(c) Five per cent (05 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Beautician Instructors with at least three years services as such; and<br>(d) fifty per cent (50 %) by initial recruitment. |
| 22 | Assistant Hostel<br>Warden<br>(BPS-12)         |  |                | By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Hostel Warden having three years service as such.   |
| 23 | Pharmacy Technician<br>(BPS-12)                |  |                | By transfer from Health Department on deputation basis.  |
| 24 | Orbhotic and Prosthetic<br>Technician (BPS-12) |  |                | By transfer from Health Department on deputation basis.  |
| 25 | Lady Health Visitor<br>(BPS-12)                |  |                | By transfer from Health Department on deputation basis.  |

|    |                                  |   |             |   |
|----|----------------------------------|---|-------------|---|
| 26 | Junior Clerk (BPS-11)            | <p>(i) I.A. / FSc with second division or equivalent qualification from a recognized Board; and</p> <p>(ii) A speed of thirty (30) words per minute in typing.</p>  | 18-32 years | <p>(d) Thirty per cent (30 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Daftris, Naib Qasids, Chowkidars, Sweepers, Malis, Security Guards, Cooks and Attendants with two years service as such, who have passed I.A. / FSc examination from a recognized Board;</p> <p>(b) thirty per cent (30 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Auxiliary Workers having at least three years service as such;</p> <p>(c) ten per cent (10 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Store Keepers having at least three years service as such; and</p> <p>(d) thirty per cent (30 %) by initial recruitment.</p> <p>Note: A joint seniority list of Daftris, Naib Qasids, Chowkidars, Sweepers, Malis, Security Guards, Cooks and Attendants shall be maintained for the purpose of promotion.</p> |
| 27 | Instructor (Electrical) (BPS-11) | At least Second Division Intermediate Certificate from a recognized Board with one year Diploma in Electrical Technology from the Board of Technical Education or Secondary School Certificate from recognized Board with three years Diploma in Electrical Technology. | 18-28 years | By initial recruitment.   |
| 28 | Instructor (Tailoring) (BPS-11)  | At least Second Division Intermediate Certificate from a recognized Board with at least one year diploma in vocational skills from the Board of Technical Education with three years experience as Tailor.  | 18-28 years | By initial recruitment.   |
| 29 | Instructor (Carpenter) (BPS-11)  | At least Second Division Intermediate Certificate from a recognized Board with one year diploma in relevant field from the Board of Technical Education with three years experience as Carpenter.   | 18-28 years | By initial recruitment.   |

19

|    |   |  |             |  |
|----|---|--|-------------|--|
| 30 | Beautician Instructor (Female) (BPS-11) | At least Second Division Intermediate Certificate from a recognized Board along with two years Beautician Diploma from the Board of Technical Education.                   | 18-28 years | By initial recruitment.  |
| 31 | Welfare Teacher (BPS-10)                | At least Second Division Intermediate Certificate from a recognized Board.   | 18-30 years | By initial recruitment.  |
| 32 | Junior Vocational Teacher (BPS-10)      | At least Second Division Secondary School Certificate from a recognized Board along with three years Diploma in Women Vocational from the Board of Technical Education.    | 18-28 years | By initial recruitment.  |
| 33 | Junior Hostel Warden (BPS-10)           | At least Second Division Intermediate Certificate from a recognized Board having two years experience in the relevant field.   | 18-32 years | By initial recruitment.  |
| 34 | Needle Craft Instructor (BPS-09)        | At least Second Division Secondary School Certificate from a recognized Board with two years Certificate (G-2) in Vocational skills from the Board of Technical Education. | 18-32 years | By initial recruitment.  |
| 35 | Auxiliary Worker (BPS-07)               | At least Second Division Secondary School Certificate or equivalent qualification from a recognized Board.   | 18-32 years | By initial recruitment.  |
| 36 | Nurse Attendant (BPS-07)                | At least Second Division Secondary School Certificate from a recognized Board.   | 18-28 years | By initial recruitment.  |
| 37 | Store Keeper (BPS-07)                   | At least Second Division Secondary School Certificate from recognized Board with one year experience in the relevant field.  | 18-32 years | By initial recruitment.  |
| 38 | Driver (BPS-06)                         | Holding LTV/HTV Driving License and preferably literate.   | 18-40 years | By initial recruitment.  |
| 39 | Daftari (BPS-04)                        |  |             | By promotion, on the basis of seniority cum fitness, from amongst the holder of the post of matriculate Naib Qasids with at least three years service. |

13

|    |                         |                      |             |                         |
|----|-------------------------|----------------------|-------------|-------------------------|
| 40 | Najib Qasid (BPS-03)    | Preferably literate. | 18-40 years | By initial recruitment. |
| 41 | Sweeper (BPS-03)        | Preferably literate. | 18-40 years | By initial recruitment. |
| 42 | Chowkidar (BPS-03)      | Preferably literate. | 18-40 years | By initial recruitment. |
| 43 | Mali (BPS-03)           | Preferably literate. | 18-40 years | By initial recruitment. |
| 44 | Security Guard (BPS-03) | Preferably literate. | 18-40 years | By initial recruitment. |
| 45 | Cook (BPS-03)           | Preferably literate. | 18-40 years | By initial recruitment. |
| 46 | Attendant (BPS-03)      | Preferably literate. | 18-40 years | By initial recruitment. |

-34-

Secretary to Government of Khyber Pakhtunkhwa  
Social Welfare, Special Education &  
Women Empowerment Department

**1. of Even No & Date:**

Forwarded for information and further necessary action to the:  
Secretary to Government of Khyber Pakhtunkhwa, Establishment & Administration, Finance and Law Departments.  
Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.  
Accountant General Khyber Pakhtunkhwa Peshawar.  
Inspector Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa.  
Manager Government Printing Press Khyber Pakhtunkhwa, Peshawar for publication in the office gazette.  
All District Account Officer Khyber Pakhtunkhwa.  
1/3 to Governor Khyber Pakhtunkhwa Peshawar.  
1/3 to Chief Minister Khyber Pakhtunkhwa, Peshawar.  
1/3 to Chief Secretary Khyber Pakhtunkhwa, Peshawar.  
1/3 to Secretary Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa Peshawar.

Section Officer-II

14





Governor  
 Directorate of Special Education and  
 Women Empowerment Jamrud Road Peshawar

Dated Peshawar the 16/08/2010

OSI-912453  
 ORDER

116-62  
 In pursuance of Section 8 (1) & (2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989 added vide Notification No. SCR-  
 with Sub-rule (b) & (4) of rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989 added vide Notification No. SCR-  
 V[(E&AD)1-3/2008 dated 19-11-2009 and decision made in the Re-Structuring Committee meeting held on 12-02-2010; combined final Seniority list of  
 Office Assistant & Senior Scale Stenographer BPS-16, Social Welfare, Special Education & Women Empowerment Department, Khyber Pakhtunkhwa as stood on  
 31-03-2010 is circulated for information of all concerned.

| S.N | Name of official    | Father's Name         | Grade   | Date of Birth | Domicile     | Qualification | Date of Appointment with post                                     | Date of promotion present post | Present Posting        |
|-----|---------------------|-----------------------|---------|---------------|--------------|---------------|---|--------------------------------|------------------------|
| 1   | Mr. Syed Nabi Gul   | Mr. Ghulam Nabi       | S.S.S.G | 15.5.1968     | Charsadda    | B.Com         | 24.02.1988  | 26-04-2011                     | DSW                    |
| 2   | Mr. Abid Muhammad   | Mr. Gul Muhammad      | O.A     | 16-07-1965    | Peshawar     | MA            | 11-05-1984 as S/C<br>24.11.1992 (Adjusted from S/P on 06.01.2002) | 26-04-2011                     | OSW                    |
| 3   | Mr. Iqram Usah Jan  | Mr. Nasir Ullah Jan   | S.S.S.G | 15.3.1969     | Peshawar     | MA            | 17-05-1987 as S/C<br>11.12.2004 as S/C                            | 26-04-2011                     | GSDC Yakatoot Peshawar |
| 4   | Mr. Saifur Ab       | Mr. Hayat Ullah       | O.A     | 14-08-1966    | Charsadda    | MA            | 11-06-2014  | 22-05-2014                     | DSW                    |
| 5   | Mr. Iqbal-Ullah     | Mr. Anwar Ul Haq      | O.A     | 26-02-1981    | Charsadda    | MA            | 13-05-1984  | 28-05-2014                     | GSDC Charsadda         |
| 6   | Mr. Saif Akbar      | Mr. Nasir Zaman       | O.A     | 25-03-1981    | Mehmand      | MA            | 05-11-1989  | 27-09-2015                     | GIB (G) Peshawar       |
| 7   | Mr. Murtaza Khan    | Mr. Zerrul Hassan     | O.A     | 07-10-1981    | Charsadda    | MA            | 05-11-1989  | 12-01-2018 (Devised)           | SECSwat                |
| 8   | Mr. Rehmat Ullah    | Mr. Sherfai Aziz Khan | O.A     | 15-02-1963    | Chitral      | MA            | 01-07-1987  | 12-01-2018 (Devised)           | SEC Kohat              |
| 9   | Mr. Muhammad Sharif | Mr. Gulab Jan         | O.A     | 16-03-1965    | Karak        | MA            | 12-10-1986 as I.D.C A<br>07-07-1987 as UDC                        | 12-01-2018 (Devised)           | SEC Peshawar           |
| 10  | Mr. Hayat Ullah     | Mr. Fazl Ullah Khan   | O.A     | 12-07-1962    | Lalji Marwat | MA            | 14-06-1987  | 12-01-2018 (Devised)           | SEC Peshawar           |
| 11  | Mr. Abd AU Shah     | Mr. Abdulah Jan       | O.A     | 23-11-1962    | Peshawar     | FA            | 07-09-1988 as UDC O.A<br>11-05-86 as O.A                          | 12-01-2018 (Devised)           | SEC Abbottabad         |
| 12  | Mr. Maqsood Khan    | Mr. Musqarab Khan     | O.A     | 15-01-1967    | Abbottabad   | FA            |   |                                |                        |

SECRET

Approved B

15

|    |                           |                        |          |            |           |        |   |   |                 |
|----|---------------------------|------------------------|----------|------------|-----------|--------|---|---|-----------------|
| 13 | Mr. Dawood Khan           | Mr. Latif Khan         | S.S.S.G. | 15-03-1964 | Peshawar  | D.Com  | 18-02-1984 as J/C and<br>01-11-1986 as J/S<br>Memo 22-05-2000<br>as SSG | 12-01-2018<br>(Devolved)  | SEC Peshawar    |
| 14 | Mr. Ishlaq Ahmad          | Mr. Ghulam<br>Muhammad | O.A      | 13-10-1973 | Charsadda | MA     | 03-03-2006 as O.A   | 12-01-2018<br>(Devolved)  | SEC Charsadda   |
| 15 | Mr. Javed Iqbal<br>Naseem | Mr. Hakim Gul          | O.A      | 01-04-1967 | Karak     | Matric | 01-07-1987 as LDC<br>and 10-07-1991<br>as UDC 24-08-2006 as<br>O.A      | 12-01-2018<br>(Devolved)  | Hostel Peshawar |
| 16 | Mr. Muhammad<br>Munir     | Mr. Noor-Ul Haq        | O.A      | 15-07-1968 | Charsadda | BA     | 30-04-1988<br>as UDC 07-05-2008 as<br>O.A                               | 12-01-2018<br>(Devolved)  | SEC Charsadda   |
| 17 | Syed Majid Ali Shah       | Mr. Imtiaz Ali Shah    | O.A      | 15-04-1981 | Mardan    | MBA    | 01-07-2010 as O.A   | 12-01-2018<br>(Devolved)  | SEC Mardan      |
| 18 | Mr. Masih ullah           | Mr. Rafiullah          | O.A      | 10-02-1970 | Charsadda | B.A    | 19-09-1991 As a J/C<br>26-03-2008 As a S/C                              | 26.4.2011 on<br>acting charge<br>basis.<br>15-05-2018 on<br>regular basis.<br>A service<br>appeal is under<br>way claiming<br>seniority from<br>the date of<br>assumption<br>i.e. 26.4.2011 in<br>the analogy of<br>the Supreme<br>Court orders<br>duly<br>implemented<br>by the E&AD<br>KP | DSW             |
| 19 | Mr. Saeed<br>Muhammad     | Mr. Ahmad Khan         | O.A      | 16-12-1968 | Charsadda | Matric | 18-09-1988 As a J/C<br>04-11-2008 As a S/C                              | 26.4.2011 on<br>acting charge<br>basis.<br>15-05-2018 on<br>regular basis.  | DSW             |

16

*[Handwritten mark]*

|    |                    |                    |     |            |            |     |  |            | A service appeal is under way claiming seniority from the date assumption i.e. 26.4.2011 in the analogy of the Supreme Court orders duly implemented by the EB&AD KP. |
|----|--------------------|--------------------|-----|------------|------------|-----|--|------------|---|
| 20 | Mst. Nareen Nargis | Mr. Mustaqeem Khan | O.A | 11-4-1977  | Kohat      | B.A | 16-03-2018<br>Benazir Centre through Court | 26-12-2019 | Special Education centre Kohat  |
| 21 | Mst. Huma Kawal    | M: Farooq          | O.A | 24-04-1984 | Abbottabad | BSc | 16-03-2018<br>Benazir Centre through Court | 26-12-2019 | Directorate   |
| 22 | Mst. Rabia Jalal   |                    | O.A |            | Swat       |     | 15-03-2018<br>Benazir Centre through Court | 26-12-2019 | D.O Swat  |

1. The Section Officer-General, SW, SE & WE, Khyber Pakhtunkhwa.
2. The Assistant Director (Admin) (Lit) (Estab-I) & (B&A) Directorate of SW, SE & WE Khyber Pakhtunkhwa.
3. Deputy Director, Special Education Complex Abbottabad, Charsadda, Kohat, Mardan, Peshawar & Swat.
4. District Officer, Social Welfare, Peshawar, Charsadda, Swat, Mardan, Kohat
5. Incharge, Special Education Institutions concerned.
6. Official concerned.

Sd/—Director  
(SW, SE & WE)

Deputy Director  
(Administration)

17

VACANT POSTS DETAIL FROM PAYROLL OF APRIL 2020

| TYPE-II | DDOCode | DDODescription  | Designation    | BPS | SanctionPosts | FilledPosts | Vacant |
|---------|---------|---|----------------|-----|---------------|-------------|--------|
| EMENT   | PR4359  | PR4359 Social Welfare Provincial                      | SUPERINTENDENT | 17  | 3             | 1           | 2      |
| EMENT   | AD6129  | AD6129 Special Education Centre Abbottabad            | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | AD6163  | AD6163 District Officer Social Welfare Abbottabad     | SUPERINTENDENT | 17  | 1             | 1           | 0      |
| EMENT   | BD6249  | BD6249 Establishment of Welfare Home Buner            | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | BU6290  | BU6290 Welfare Home Bannu                             | SUPERINTENDENT | 17  | 1             | 1           | 0      |
| EMENT   | CA6275  | CA6275 Welfare Home for Destitute Children, Charsadda | SUPERINTENDENT | 17  | 1             | 1           | 0      |
| EMENT   | DA6154  | DA6154 District Officer Social Welfare Dir Lower      | SUPERINTENDENT | 17  | 2             | 0           | 2      |
| EMENT   | DI6139  | DI6139 Social Welfare Officer U C D Project D I Khan  | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | DI6246  | DI6246 Special Education Centre D I Khan              | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | HG6167  | HG6167 Establishment of Welfare Home Hangu            | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | HR6200  | HR6200 District Officer Social Welfare Haripur        | SUPERINTENDENT | 17  | 0             | 0           | 0      |
| EMENT   | HR6363  | HR6363: DARUL AMAN HARIPUR                            | SUPERINTENDENT | 17  | 1             | 1           | 0      |
| EMENT   | KT6108  | KT6108 Welfare Home Kohat                             | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | LK6081  | LK6081 District Officer Social Welfare Lakki Marwat   | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | MA6359  | MA6359 Establishment of Darul Aman Mansehra           | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | MD6144  | MD6144 Welfare Home Female Malakand                   | SUPERINTENDENT | 17  | 2             | 0           | 2      |
| EMENT   | MD6211  | MD6211 Establishment of GIB Malakand                  | SUPERINTENDENT | 17  | 1             | 0           | 1      |
| EMENT   | MR6163  | MR6163 Govt Institute for Blind Mardan                | SUPERINTENDENT | 17  | 1             | 1           | 0      |
| EMENT   | MR6251  | MR6251 Darul Aman Mardan                              | SUPERINTENDENT | 17  | 1             | 1           | 0      |
| EMENT   | MR6327  | MR6327 Darul Kafil Mardan                             | SUPERINTENDENT | 17  | 1             | 0           | 1      |

*Amir C*  
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|      |                     |        |  |                |    |    |    |    |
|------|---------------------|--------|--|----------------|----|----|----|----|
| MENT | SETTLEMENT DISTRICT | RR6148 | NR6148 Superintendand Welfare Home<br>Nowshera Nowshera                | SUPERINTENDENT | 17 | 1  | 0  | 1  |
| MENT | SETTLEMENT DISTRICT | PW6144 | PW6144 Govt Institute for Blind (M) Peshawar                           | SUPERINTENDENT | 17 | 1  | 1  | 0  |
| MENT | SETTLEMENT DISTRICT | PW6149 | PW6148 Special Education Centre Peshawar                               | SUPERINTENDENT | 17 | 1  | 1  | 0  |
| MENT | SETTLEMENT DISTRICT | PW6165 | PW6165 Welfare Home Peshawar   | SUPERINTENDENT | 17 | 1  | 0  | 1  |
| MENT | SETTLEMENT DISTRICT | PW6259 | PW6259 Superintendent Welfare Home for<br>Children Beggars at Peshawar | SUPERINTENDENT | 17 | 1  | 0  | 1  |
| MENT | SETTLEMENT DISTRICT | SU6136 | SU6136 Special Education Centre Swabi                                  | SUPERINTENDENT | 17 | 1  | 1  | 0  |
| MENT | SETTLEMENT DISTRICT | SU6320 | SU6320 Establishment of Welfare Home Swabi                             | SUPERINTENDENT | 17 | 1  | 0  | 1  |
| MENT | SETTLEMENT DISTRICT | SW6197 | SW6197 Special Education Centre Swat                                   | SUPERINTENDENT | 17 | 1  | 0  | 1  |
| MENT | SETTLEMENT DISTRICT | SW6281 | SW6281 Darul Aman Swat   | SUPERINTENDENT | 17 | 1  | 1  | 0  |
| MENT | SETTLEMENT DISTRICT | SW6328 | SW6328 Darul Kafal Swat  | SUPERINTENDENT | 17 | 1  | 0  | 1  |
|      |                     |        | Grand Total  |                | 17 | 11 | 22 |    |
|      |                     |        |  |                |    | 33 | 11 | 22 |

2

19



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**OFFICE OF THE DISTRICT OFFICER,**  
**SOCIAL WELFARE, SPECIAL EDUCATION &**  
**WOMEN EMPOWERMENT, KARAK**

Facebook: Social Welfare Department Karak  
Phone# 0927-291064

NO.DO/SW/KK/ 2259

Dated 22-07-2024

To

The Director,  
Directorate of Social Welfare Special Education & Women Empowerment,  
Government of Khyber Pakhtunkhwa.

Subject; APEAL FOR PROMOTION FROM ASSISTANT BPS-16 TO SUPERINTENDENT BPS-17.

Please find enclosed herewith the original (self explanatory) applications in respect of the following employees of this office.

1. Mr. Muhammad Sharif Assistant centres for intellectually and physically Challenge Children.
2. Mr. Javed Iqbal Naseem Assistant Govt; school for Deaf Children

Submitted for favorable consideration as per rule.

o/c

**Muhammad HUSSAIN**  
District Officer  
Social Welfare, Karak

21

To

The Director,  
Directorate of Social Welfare, Special Education and Women Empowerment, Govt: of  
Khyber Pakhtunkhwa, Peshawar.

**THROUGH PROPER CHANNEL**

**Subject: APEAL FOR PROMOTION FROM ASSISTANT BPS-16 TO SUPERINTENDENT BPS-17.**

R/Sir,

Respectively it is stated that according to Serial No. 10 of the Service Rules, Notified vide Notification No. SOII/SWD/11-12/ Service Rules/2019-20/320-52 dated 09-25-2019 (copy enclosed) the post of Superintendent BPS-17 is to be filled as under:

**"By promotion on the basis of seniority-cum-fitness,  
from amongst the Assistant and Senior Scales Stenographer  
With at least Five year service as such"  
Note: - a joint seniority list of assistant and senior scale  
Stenographer shall be maintained for the purpose of promotion.**

2. Currently there are more than 22 posts of Superintendent BPS-17 lying vacant in Directorate of Social Welfare, Special Education & Women Empowerment, Welfare Homes & Government Institute for Special Children's since long.
3. According to seniority list issued Vide No. E-17/17/DSW/Vol-6/1160-65 dated 10-08-2020 (copy enclosed), a number of incumbents of the posts of Office Assistant & Senior Scale Stenographer BPS-16 are eligible for promotion as per rules mentioned above.
4. Therefore it is earnestly requested that the promotion case may be forwarded to quarter concerned for consideration & oblige please.

Yours Faithfully

  
Muhammad Sharif  
Office Assistants (B-16)

19-7-2024  
Center for Intellectually and physically  
Challenge Children Karak

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
SOCIAL WELFARE, SPECIAL EDUCATION AND WOMEN EMPOWERMENT DEPARTMENT**

**NOTIFICATION**

*Peshawar, dated the September, 23<sup>rd</sup> 2019*

**Ms. NUSWDT/Service Rules/2019-20/320-53** In pursuance to 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 Notifications issued in this behalf, the Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 1 to 5 of the Appendix to this Notification, which shall be applicable to all the posts in the strength of Directorate of Social Welfare, Special Education and Women Empowerment Khyber Pakhtunkhwa (Social Welfare Side) specified in column 2 of the said Appendix:

**APPENDIX**

| S.No. | Nomenclature                | Minimum qualification for Initial recruitment   | Age Limit   | Method of Recruitment  |
|-------|-----------------------------|---|-------------|--|
| 1     | Director (BPS-19)           | 3   | 4           | By transfer of PCS/PMS/PAS Officer of the Provincial Government.   |
| 2     | Deputy Director (BPS-18)    | —   | —           | By promotion, on the basis of seniority-cum-fitness, from amongst the Social Welfare Officers, Managers, Rehabilitation Officers and Assistant Directors with at least five years service as such.<br>Note: A joint seniority list of Social Welfare Officers, Managers, Rehabilitation Officers and Assistant Directors shall be maintained for the purpose of promotion. |
| 3     | Assistant Director (BPS-17) | At least Second Class Master's Degree or equivalent qualification from a recognized University. | 21-35 years | (a) Thirty per cent (30 %) by promotion, on the basis of seniority-cum-fitness, from amongst the Superintendent with at least three years service as such and have qualification of graduation from a recognized University; and<br>(b) Seventy per cent (70 %) by Initial recruitment.  |

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|----|--|---|-------------|--|
|    | Manager (BPS-17)                         | At least Second Class Master's Degree in Social Work, Sociology, Anthropology or equivalent qualification from a recognized University.             | 21-35 years | (a) Ten per cent (10%) by promotion, on basis of seniority-cum-fitness, from amongst the Administrative Officers with at least three years services as such; and<br>(b) ninety per cent (90%) by initial recruitment.  |
| 5  | Rehabilitation Officer (BPS-17)          | At least Second Class Master's Degree in Social Work, Sociology, Psychology, Anthropology or equivalent qualification from a recognized University. | 21-35 years | By initial recruitment.  |
| 6  | District Officer Social Welfare (BPS-17) |   |             | By transfer from amongst the officers in BPS-17 of Directorate of Social Welfare, Khyber Pakhtunkhwa, on social welfare side.  |
| 7  | Social Welfare Officer (BPS-17)          | At least Second Class Master's Degree in Social Work, Sociology, Anthropology or equivalent qualification from a recognized University.             | 21-35 years | (a) Ten per cent (10%) by promotion, on the basis of seniority-cum-fitness, from amongst the Field Officers with at least five years service as such; and<br>(b) ninety (90%) by initial recruitment.  |
| 8  | Medical Officer (BPS-17)                 |   |             | By transfer from Health Department on deputation basis.  |
| 9  | Psychologist (BPS-17)                    |   |             | By transfer from Health Department on deputation basis.  |
| 10 | Superintendent (BPS-17)                  |   |             | By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants and Senior Scale Stenographers with at least five years service as such.<br>Note: A joint seniority list of Assistants and Senior Scale Stenographers shall be maintained for the purpose of promotion. |
| 11 | Administrative Officer (BPS-17)          | At least Second Class Master's Degree or equivalent qualification from a recognized University.   | 21-35 years | By initial recruitment.  |
| 12 | Field Officer (BPS-16)                   | At least Second Class Master's Degree in Social Work, Sociology or Anthropology or equivalent qualification from a recognized University.           | 21-35 years | By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Vocational Teachers with at least three years service as such.  |

1. The Section Officer General, SW, S.E.W. & Other Publications, Hyderabad, is requested to check the above mentioned entries and if any objection / suggestion / modification is required to be made, the same may be intimated to the undersigned by return post or by e-mail within 15 days of the receipt of this letter.

2. The Assistant Director (General) Hyderabad, Hyderabad, is requested to check the above mentioned entries and if any objection / suggestion / modification is required to be made, the same may be intimated to the undersigned by return post or by e-mail within 15 days of the receipt of this letter.

3. Deputy Director, Books, Hyderabad, Hyderabad, is requested to check the above mentioned entries and if any objection / suggestion / modification is required to be made, the same may be intimated to the undersigned by return post or by e-mail within 15 days of the receipt of this letter.

4. Deputy Director, Books, Hyderabad, Hyderabad, is requested to check the above mentioned entries and if any objection / suggestion / modification is required to be made, the same may be intimated to the undersigned by return post or by e-mail within 15 days of the receipt of this letter.

(Signature)  
 Section Officer  
 Hyderabad

(Signature)  
 Section Officer  
 Hyderabad

| Sl. No. | Name            | Designation     | Grade | Pay Band | Grade Pay | Remarks                    |
|---------|-----------------|-----------------|-------|----------|-----------|----------------------------|
| 13      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 14      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 15      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 16      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 17      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 18      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 19      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 20      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 21      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 22      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 23      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 24      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |
| 25      | Mr. M. M. M. M. | Mr. M. M. M. M. | MA    | 12,100   | 12,100    | 02.11.1973 (Date of entry) |

48

| Sr | Name of official  | Father's Name        | Qualif | Date of Birth | Domilia | Qualification | Date of Appointment with post | Date of Resignation | Present Position |
|----|-------------------|----------------------|--------|---------------|---------|---------------|-------------------------------|---------------------|------------------|
| 1  | Mr. Akmal Ullah   | Mr. Sher Gul Khan    | DA     | 25-02-1963    | Chitral | MA            | 06-11-1989                    | 01-07-1987          | SEC Secy         |
| 2  | Mr. Muhammad Shah | Mr. Gulab Khan       | DA     | 16-02-1963    | Kash    | MA            | 11-02-1987                    | 01-07-1987          | SEC Secy         |
| 3  | Mr. Muzay Khan    | Mr. Fateh Ullah Khan | DA     | 13-01-1962    | Chitral | MA            | 01-07-1987                    | 11-02-1987          | SEC Secy         |
| 4  | Mr. Abdul Wahid   | Mr. Abdul Wahid      | DA     | 11-11-1962    | Chitral | MA            | 11-02-1987                    | 11-02-1987          | SEC Secy         |
| 5  | Mr. Abdul Wahid   | Mr. Abdul Wahid      | DA     | 11-11-1962    | Chitral | MA            | 11-02-1987                    | 11-02-1987          | SEC Secy         |
| 6  | Mr. Dawood Khan   | Mr. Dawood Khan      | DA     | 15-02-1964    | Chitral | MA            | 01-11-1986                    | 01-11-1986          | SEC Secy         |
| 7  | Mr. Muzay Khan    | Mr. Muzay Khan       | DA     | 13-10-1973    | Chitral | MA            | 01-01-2001                    | 01-01-2001          | SEC Secy         |
| 8  | Mr. Muzay Khan    | Mr. Muzay Khan       | DA     | 01-04-1967    | Kash    | MA            | 01-07-1987                    | 01-07-1987          | SEC Secy         |
| 9  | Mr. Muzay Khan    | Mr. Muzay Khan       | DA     | 15-07-1968    | Chitral | MA            | 11-02-1987                    | 11-02-1987          | SEC Secy         |
| 10 | Mr. Muzay Khan    | Mr. Muzay Khan       | DA     | 15-04-1981    | Chitral | MA            | 01-07-2010                    | 01-07-2010          | SEC Secy         |
| 11 | Mr. Muzay Khan    | Mr. Muzay Khan       | DA     | 15-02-1964    | Chitral | MA            | 11-02-1987                    | 11-02-1987          | SEC Secy         |
| 12 | Mr. Muzay Khan    | Mr. Muzay Khan       | DA     | 16-07-1963    | Chitral | MA            | 11-02-1987                    | 11-02-1987          | SEC Secy         |

No. 17/77/25W/P-6/2010  
 In pursuance of Section 3 (1) & (2) of the Government of Punjab Act, 1973 read with sub-rule (b) & (c) of rule 17 of the Punjab Public Service Commission (Recruitment and Control) Rules, 1973, the following list of candidates for the post of Assistant Secretary to Government of Punjab, Punjab Public Service Commission is being published for the information of the candidates.  
 Government of Punjab, Punjab Public Service Commission  
 Director of Social Welfare, Special Education & Women Empowerment, Lahore Road, Lahore.

25

POWER OF ATTORNEY

In the Court of Khyber Pakhtun Khwa Province Tribunal  
Muhammael Sheriff

} For  
} Plaintiff  
} Appellant  
} Petitioner  
} Complainant

VERSUS

Govt of Khyber Pakhtun Khwa  
and others

} Defendant  
} Respondent  
} Accused

Appeal/Revision/Suit/Application/Petition/Case No. \_\_\_\_\_ of \_\_\_\_\_  
Fixed for \_\_\_\_\_

I/W, the undersigned, do hereby nominate and appoint


ZARAJ ANWAR & IMRAN KHAN ADVOCATES, my true and lawful attorney, for me in my same and on my behalf to appear at \_\_\_\_\_ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions, An appeal, statements, accounts, exhibits, Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out, and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

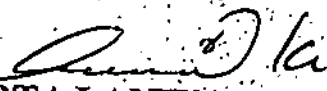
AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

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

IN WITNESS whereof I/we have hereto signed at \_\_\_\_\_  
the \_\_\_\_\_ day to \_\_\_\_\_ the year \_\_\_\_\_  
Executant/Executants \_\_\_\_\_  
Accepted subject to the terms regarding fee \_\_\_\_\_

  
**IMRAN KHAN**  
Advocate High Court  
Mob: 0345-9090648

  
**ZARAJ ANWAR**  
Advocate Supreme Court Of Pakistan  
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
Fk-1, Fourth Floor, Billoor Plaza, Saddar Road, Peshawar Cantt  
Mobile-0331-9399185 BC-10-9851  
CNIC: 17301-1610454-3