

**BEFORE THE KHYBER PUKHTUN KHWA SERVICE
TRIBUNAL PESHAWAR**

CM No. _____ of 2024

In

Service Appeal No. 1553/2022

Ghaus Ur Rehman

..... Petitioner

VERSUS

Govt Of KPK and others

..... Respondents

INDEX

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1.	Application for placing additional documents on file		1-2
2.	Affidavit		3
3.	Copy of the documents	"A"	4-14



PETITIONER

Through Counsel



Muhammad Javaid Khan
Advocate, Supreme Court of Pakistan
Cell # 0343-9607492
Off# Near Allah-o-Akbar Masjid,
College Colony, Saidu Sharif, Swat

①

BEFORE THE KHYBER PUKHTUN KHWA SERVICE
TRIBUNAL PESHAWAR

CM No. _____ of 2024

In

Service Appeal No.1553/2022

Khyber Pakhtukhwa
Service Tribunal

Diary No. 14590

Dated 30/7/24

Ghaus Ur Rehman

..... Petitioner

VERSUS

Govt Of KPK and others

..... Respondents

APPLICATION FOR PLACING ON FILE ADDITIONAL
DOCUMENTS

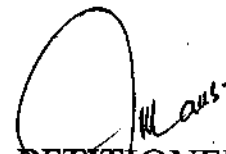
Respectfully Sheweth:

The Applicants/Petitioners submit as under:

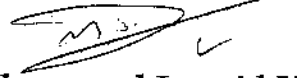
- 1) That the above mentioned service appeal is pending before this Honorable Court, and next date of hearing is 03/09/2024.
- 2) That the applicants / petitioners want to place additional documents on file. (Copies of documents are attached herewith as annexure "A")

2

It is therefore humbly prayed that an
order prayed for may be passed, please.


PETITIONER

Through Counsel


Muhammad Javaid Khan
Advocate, Supreme Court of Pakistan

BEFORE THE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

CM No. _____ of 2024
In
Service Appeal No. 1553/2022.

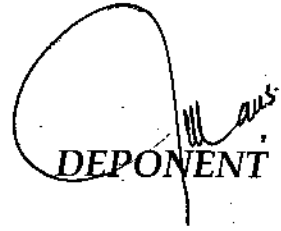
Ghaus Ur Rehman Petitioner

VERSUS

Govt Of KPK and others Respondents

AFFIDAVIT

I, Ghaus Ur Rehman(Petitioner in person), do hereby solemnly affirm and declare on oath that the contents of the accompany application are true and correct to the best of my knowledge and belief, and nothing has been kept concealed from this Honourable court.


DEPONENT

Ghaus Ur Rehman



30 JUL 2024



GOVERNMENT OF KHYBER PAKHTUNKHWA
CIVIL DEFENCE DIRECTORATE PESHAWAR
Phone No. 9225309 (Fax No. 9225308)
Email. directorcivildefecpk@gmail.com

4

No. 3159-3193 /1/357/DCD/Estt.

Dated 29 / 04 / 2022

To: All Deputy Commissioners/
Controller Civil Defence
in Khyber Pakhtunkhwa

Subject:- **FINAL SENIORITY LIST OF INSTRUCTORS GRADE-II (BPS-12)
OF THE CIVIL DEFENCE DIRECTORATE KHYBER
PAKHTUNKHWA AS STOOD ON 31-12-2021.**

In continuation of this Directorate letter No. 616-650/1/357/DCD/Estt:
dated 27-01-2022 on the subject noted above.

2. Final Seniority List of Instructors Grade-II (BPS-12) of the Civil Defence
Directorate Khyber Pakhtunkhwa has been prepared and is circulated among all
concerned for information.

DIRECTOR CIVIL DEFENCE
KHYBER PAKHTUNKHWA
PESHAWAR

Endst: No. 3194-3232 /1/357/DCD/Estt.

Dated 29 / 04 / 2022

Copy forwarded to the following information with reference to this
Directorate Endst: No. 651-764/1/357/DCD/Estt: dated 27-01-2022:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Relief,
Rehabilitation & Settlement Department Peshawar please.
2. The Focal Person (PMRU), Government of Khyber Pakhtunkhwa, Relief,
Rehabilitation & Settlement Department Peshawar.
3. The Superintendent, Civil Defence Directorate (Newly Merged Areas)
Peshawar.
4. All Civil Defence Officers in Khyber Pakhtunkhwa.
5. Officials concerned for information and compliance.

DIRECTOR CIVIL DEFENCE
KHYBER PAKHTUNKHWA
PESHAWAR

CDO

DC Dis (C)
31-5-2022

3401
3/06/2022

PROBATIONARY LIST OF INSTRUCTORS GRADE-II (BPS-12) OF CIVIL DEFENCE DIRECTORATE KHYBER PAKHTUNKHWA AS STOOD ON 31-12-2021

S#	Name of Officials	Academic Qualifications	Date of Birth	Domicile	Date of 1 st entry into Govt. Service	Regular appointment / promotion to the present posts			Remarks
						Date	BPS	Method of Recruitment	
1	2	3	4	5	6	7	8	9	10
1	Mr. Abdul Wahab	SSC	01-01-1989	Mohmand	28-8-2007 As Chowkidar 27-04-2016 As Instructor Grade-III	27-04-2019 As Instructor Grade-II	12	By promotion	Appointed on acting charge basis as Instructor Grade-I (BPS-15) with effect from 31-05-2021.
2	Mr. Shahzad Hussain	SSC	21-03-1987	Nowshera	20-1-2014 As Sweeper 27-04-2016 As Instructor Grade-III	27-04-2019 As Instructor Grade-II	12	By promotion	Appointed on acting charge basis as Instructor Grade-I (BPS-15) with effect from 31-05-2021.
3	Mr. Saddam Hussain	FA	15-03-1992	Peshawar	27-04-2016 As Instructor Grade-III	27-04-2019 As Instructor Grade-II	12	By promotion	Appointed on acting charge basis as Instructor Grade-I (BPS-15) with effect from 31-05-2021.
4	Mr. Manzoor-Ul-Haq	FA	07-07-1993	Dir (U)	27-04-2016 As Instructor Grade-III	27-04-2019 As Instructor Grade-II	12	By promotion	Appointed on acting charge basis as Instructor Grade-I (BPS-15) with effect from 31-05-2021.
5	Mr. Jamshed Khan	MA (Political Science)	25-04-1993	Bannu	12-05-2016 As Instructor Grade-III	12-05-2019 As Instructor Grade-II	12	By promotion	Appointed on acting charge basis as Instructor Grade-I (BPS-15) with effect from 31-05-2021.
6	Miss. Sanam Batool	BA	06-09-1993	D.I. Khan	27-04-2016 As Instructor Grade-II	27-04-2016 As Instructor Grade-II	12	By initial appointment	
7	Miss. Anila Zaib	BA (LLB)	04-02-1989	Mardan	27-08-2016 As Instructor Grade-II	22-08-2016 As Instructor Grade-II	12	By initial appointment	
8	Miss. Nadia Humayun	BA	10-03-1988	Peshawar	31-08-2016 As Instructor Grade-II	31-08-2016 As Instructor Grade-II	12	By initial appointment	
9	Mrs. Amina Ahmad	F.Sc	20-09-1989	Peshawar	31-08-2016 As Instructor Grade-II	31-08-2016 As Instructor Grade-II	12	By initial appointment	
10	Mrs. Mamoonah Azhar	B.Sc. B.Ed	05-08-1992	Charsadda	09-12-2016 As Instructor Grade-II	09-12-2016 As Instructor Grade-II	12	By initial appointment	
11	Mrs. Abida Ilyas	FA	10-02-1982	Mardan	27-01-2015 As NiQ 22-08-2016 As Instructor Grade-III	22-08-2019 As Instructor Grade-II	12	By Promotion	
12	Mr. Adnan Bashir	FA	01-04-1979	Peshawar	04-12-2013 As Naib Qasid 22-08-2016 As Instructor Grade-III	22-08-2019 As Instructor Grade-II	12	By Promotion	
13	Mr. Irfan Ullah	FA	12-03-1980	Mohmand	28-08-2007 As Naib Qasid 27-04-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By Promotion	
14	Mr. Muhammad Shoab	SSC	02-01-1986	D.I. Khan	09-07-2009 As Chowkidar 27-04-2016 As Instructor Grade-III	14-12-2020 As Instructor Grade-II	12	By Promotion	
15	Mr. Atta Ullah	FA	02-05-1994	Malakand	01-12-2010 As Sweeper 27-04-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
16	Mr. Abid Khan	FA	04-04-1995	Peshawar	27-04-2016 As Instructor Grade-III	14-12-2020 As Instructor Grade-II	12	By promotion	
17	Mr. Muhib-Ul-Azam	FA	10-03-1991	Chitral (L)	29-04-2016 As Instructor Grade-III	14-12-2020 As Instructor Grade-II	12	By promotion	
18	Mr. Kamil Saleem	FA	25-01-1995	Kohat	29-04-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
19	Mr. Inayat Ur Rehman	SSC	17-03-1984	Charsadda	10-6-2010 As Chowkidar 31-08-2016 As Instructor Grade-III	31-08-2019 As Instructor Grade-II	12	By Promotion	
20	Mr. Iqbal Wali Shah	BA	01-05-1987	Chitral Lower	22-03-2011 As Sweeper 31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
21	Mr. Hazrat Bilal	FA	15-02-1988	Swat	16-06-2011 As Sweeper 31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
22	Mr. Bashir Khan	FA	10-04-1980	Charsadda	31-12-2015 As Naib Qasid 31-03-2016 As Instructor Grade-III	14-12-2020 As Instructor Grade-II	12	By promotion	
23	Mr. Asif Mukhtiar	BBA (HRM)	27-05-1987	Peshawar	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
24	Mr. Usman Asad Ullah	FA	10-03-1987	Peshawar	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
25	Mr. Inamullah	BA	07-02-1988	Swat	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
26	Mr. Shahab Gul	FA	28-06-1989	Peshawar	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
27	Mr. Asaq Ahsan	BA	01-03-1990	Bannu	31-08-2016 As Instructor Grade-II	31-05-2021 As Instructor Grade-II	12	By promotion	
28	Mr. Muhammad Idrees	FA	09-01-1990	Nowshera	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
29	Mr. Tehseen Ahmad	BA	20-02-1991	Swabi	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
30	Mr. Muhammad Ozair	FA	01-01-1992	Peshawar	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
31	Mr. Shahbaz Khan	F.Sc	26-03-1992	Hangu	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
32	Mr. Jawad Saeed	BBA (Hons)	07-07-1992	Abbottabad	31-08-2016 As Instructor Grade-III	31-08-2019 As Instructor Grade-II	12	By promotion	
33	Muhammad Naeem	BA	01-03-1993	Chitral	31-08-2016 As Instructor Grade-II	31-05-2021 As Instructor Grade-II	12	By Promotion	
34	Mr. Omer Saddique	BA	21-05-1993	Peshawar	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
35	Mr. Uzair-ul-Hadi	BA	09-11-1993	Peshawar	31-08-2016 As Instructor Grade-III	31-08-2019 As Instructor Grade-II	12	By Promotion	
36	Muhammad Zada	FA	15-09-1994	Dir Upper	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	

DIRECTOR CIVIL DEFENCE
KHYBER PAKHTUNKHWA

S #	Name of Officials	Academic Qualifications	Date of Birth	Domicile	Date of 1 st entry into Govt. Service	Regular appointment / promotion to the present posts			Remarks
						Date	BPS	Method of Recruitment	
1	2	3	4	5	6	7	8	9	10
37	Mr. Sanaulfah	SSC	12-09-1995	Nowshera	31-08-2016 As Instructor Grade-III	31-08-2019 As Instructor Grade-II	12	By Promotion	
38	Mr. Sheraz Khan	DAE	07-02-1996	Nowshera	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
39	Mr. Ali Raza	BA (DIT)	06-06-1996	Peshawar	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
40	Mr. Tariq Aziz	BA	05-07-1996	Miranshah	31-08-2016 As Instructor Grade-III	31-08-2019 As Instructor Grade-II	12	By Promotion	
41	Muhammad Juniad	FA	05-03-1997	Charsadda	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
42	Mr. Irfan Ullah	FA	02-04-1997	Dir Upper	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
43	Mr. Sohail Abbas	BA	15-11-1997	Dir (U)	31-08-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
44	Syed Imtiaz Ali Shah	DAE	22-09-1982	Nowshera	10-10-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
45	Muhammad Noman Awan	MSc	01-01-1990	Nowshera	14-10-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
46	Mr. Midrar Khan	MA Islamiat	13-03-1991	Nowshera	09-12-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
47	Mr. Kashif Ahmad	B.Sc	13-05-1995	Landikotal	09-12-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
48	Mr. Umar Farooq	FA	16-11-1995	Peshawar	09-12-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
49	Mr. Waqas Khan	B.Sc	30-04-1990	Nowshera	15-12-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
50	Mst. Saima Bibi	FA	24-12-1998	Dir (U)	26-12-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
51	Mr. Suliman (d)	SSC	01-05-1996	Peshawar	29-12-2016 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
52	Mr. Israr Ahmad	MA	19-03-1986	Dir. Upper	16-01-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
53	Mr. Qasim Jan	FA	05-04-1996	Charsadda	09-02-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
54	Muhammad Salman Khan	B.Com	19-09-1997	Peshawar	10-03-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
55	Mr. Rasool Daraz	MA	16-03-1981	S. Waziristan	26-04-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
56	Muhammad Waqas	FA	26-06-1993	Abbottabad	28-04-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
57	Ghus-ur-Rehman	BA	15-7-1990	Dir Lower	27-11-2010 As Nail Qasid 23-05-2017 As Instructor Grade-III	14-12-2020 As Instructor Grade-II	12	By promotion	
58	Mr. Yaqoob Khan	FA	06-04-1991	Mohmand	27-04-2016 As Chowkidar 23-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
59	Syed Noman Shah	BA	17-03-1993	Abbottabad	23-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
60	Muhammad Nadir Khan	BS (physics)	06-03-1994	Abbottabad	23-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
61	Mr. Mansoor Ahmad	B.Sc	29-11-1994	Abbottabad	23-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
62	Muhammad Danish Shabbir	F.Sc	10-08-1995	Peshawar	23-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
63	Mr. Fazal e Hadi	FA	15-04-1997	Bajaur	26-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
64	Mr. Ali Zaib	FA	25-03-1984	Mardan	22-08-2016 As Nail Qasid 29-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
65	Mr. Fayaz Khan Khalil	SSC	10-04-1986	Peshawar	29-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
66	Mr. Kamran Latif	MBA Finance	21-12-1989	Peshawar	29-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
67	Mr. Bilal Saeed	FA	05-01-1994	Dir (Lower)	29-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
68	Mr. Sahib-ul-Haq	FA	01-03-1995	Mardan	29-05-2017 As Instructor Grade-III	31-05-2021 As Instructor Grade-II	12	By promotion	
69	Mr. Aqal Muhammad	SSC	18-07-1970	Khyber	06-05-1996 As Fireman 16-12-2013 As Fire Officer	31-05-2021 As Instructor Grade-II	12	By promotion	
70	Mr. Jalal-Ud-Din	B.A	10-01-1980	North Waziristan	30-08-2007 As Fireman 16-12-2013 As Fire Officer	31-05-2021 As Instructor Grade-II	12	By promotion	
71	Mr. Abid Ali Shah	SSC	15-03-1983	Bajaur	04-09-2007 As Fireman 21-12-2013 As Fire Officer	31-05-2021 As Instructor Grade-II	12	By promotion	
72	Mr. Rooh-ul-Amin	FA	13-06-1988	Nowshera	31-08-2016 As Fire Officer	31-05-2021 As Instructor Grade-II	12	By promotion	
73	Mst. Shakela Naz	FA	12-04-1990	Malakand	31-05-2021 As Instructor Grade-III	31-05-2021	08	By initial appointment	
74	Mr. Shah Rukh	BBA (Hons)	10-04-1991	Karak	04-06-2021 As Instructor Grade-II	04-06-2021 As Instructor Grade-II	12	By initial appointment	
75	Mr. Habib-ul-Haq	BA	10-02-1995	Dir Lower	04-06-2021 As Instructor Grade-II	04-06-2021 As Instructor Grade-II	12	By initial appointment	
76	Malik Ahsan Iqbal	BS (Law)	19-02-1998	Abbottabad	04-06-2021 As Instructor Grade-II	04-06-2021 As Instructor Grade-II	12	By initial appointment	
77	Syed Ismail	BS (Hons)	25-08-1998	Abbottabad	04-06-2021 As Instructor Grade-II	04-06-2021 As Instructor Grade-II	12	By initial appointment	

DIRECTOR CIVIL DEFENCE
KHYBER PAKHTUNKHWA

DIARY

No. and Date of document received	From whom received	File	Special instructions
3400	Subscription	PT. WORKSHEET	ASSETS
3401	Final Seniority List of Instructors Grade-11	Final Seniority List	CDO
3402	Final Seniority List of Class 12 Instructors	Final Seniority List	CDO
3403	Final Seniority List of Junior Teachers	Final Seniority List	CDO
3404	Final Seniority List of Junior Cheats	Final Seniority List	CDO
3405	Final Seniority List of Junior Cheats (Spss-11)	Final Seniority List	CDO
3406	Final Seniority List of Junior Cheats (Spss-11)	Final Seniority List	CDO

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DIARY

Diary Serial No.	No. and Date of document received	From whom received	File	Special instructions
03-06-22	3759-3809/11/447/DCP/ASU	CDO	Production	
3401	3759-3773/11/357/DCP/ASU	CDO	Production	
3402	3773-3787/11/357/DCP/ASU	CDO	Production	
3403	3787-3809/11/357/DCP/ASU	CDO	Production	
3404	3307-3334/11/357/DCP/ASU	CDO	Production	
3405	29/04/2022			
3406	29/04/2022			
3407	29/04/2022			
3408	29/04/2022			
3409	29/04/2022			
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3500	29/04/2022			

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**IN RESPECT OF THE DIRECTOR CIVIL DEFENCE
GOVERNMENT OF KHYBER PAKHTUNKHWA
PESHAWAR.**

DEPARTMENTAL APPEAL

Ghausur Rehman Appellant

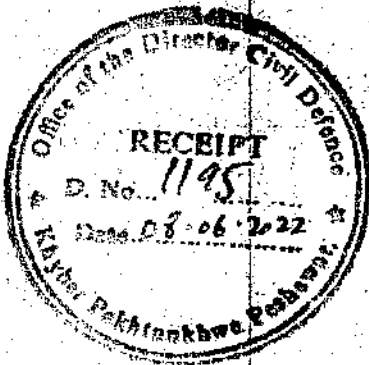
Versus

Director Civil Defence Khyber Pakhtunkhwa Respondents

INDEX

S.No	Description	Annexure	Pages
1	Copy of appeal a/w affidavit		
2	Copies of all relevant documents		
3	Copies of both seniority lists		

M. Gaus
GHAUSUR REHMAN
Appellant



IN RESPECT OF DIRECTOR CIVIL DEFENCE KHYBER
PAKHTUNKHWA AT PESHAWAR

9

(Departmental Appeal)

Ghausur Rehman Son of Faqir. Khan, resident of Colony
Balambat Timergara District Dir Lower..... Appellant

VERSUS

Director Civil Defence Khyber Pakhtunkhwa
.....Respondent

DEPARTMENTAL APPEAL AGAINST THE ACT OF
RESPONDENT, DUE TO WHICH THE APPELLANT
WAS PLACED AT SERIAL NO. 57 OF THE FINAL
SENIORITY LIST ALTHOUGH HE WAS
PREVIOUSLY BEEN FIGURED AT AT SERIAL
NO.16 OF THE TENTATIVE SENIORITY LIST, BY
THE RESPONDENT.

Prayer in appeal

*It is therefore humbly prayed that on
acceptance of the instant departmental
appeal, the position of appellant may
kindly be retained at serial No.16 of the
seniority list and in pursuance of such
position i.e. at Serial No.16, he be*

(10)

*promoted to the post of Instructor Grade-I
(B-15) as per his entitlement.*

*ii. It is also prayed that the respondents
be restrained from proceeding/promotions
to the post of Instructor Grade-I BPS-15, till
the final decision of the instant
departmental appeal.*

Respectfully Sheweth,

The facts of the instant appeal are as under:

FACTS

1. That initially appellant was appointed as Naib Qasid on 27.01.2010 in respondent Department on contract basis and later on in year 2012 he amongst others was regularized.
2. That the appellant was promoted to the post of Instructor Grade-III BPS-8 on 23.05.2017 and due to his seniority/entitlement he was further promoted to

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the Instructor Grade-II BPS-12 vide dated 14.12.2020.

(Copies of all relevant documents are attached)

3. That the respondent, prepared a seniority list on 27.01.2022, wherein appellant was placed at Serial No.16 of the Seniority list, and was hopeful qua his promotion, but he got astonished to know that the respondent malafidely issued another seniority list on 29.04.2022 wherein he was allegedly figured at Serial No.57 (*Copies of both seniority lists are attached as annexure-A & B Respectively*).

4. That all those colleagues who were appointed as class-iv mentioned as under,

S.No	Name of Employee	Firstly appointed as	Date of initial appointment	Date of promotion to Instructor-G-III (BPS-8)
1.	Shehzad Hussain	Sweeper	20.01.2014	27.04.2016
2.	Abidallyas	Naib Qasid	27.04.2016	22.08.2016

3.	Attaullah	Sweeper	01.12.2010	27.04.2016
4.	Iqbal Wali Shah	Sweeper	22.03.2011	31.08.2016
5.	Hazrat Bilal	Sweeper	16.06.2016	31.08.2016
6.	Bashir Khan	Naib Qasid	31.12.2015	31.03.2016
7.	Appellant/ Ghaus ur Rehman	Naib Qasid	27.11.2010	23.05.2017

So, as per seniority the appellant is most senior but the respondent just on malafide intention placed him at Serial No. 57, hence such act of respondent is highly discriminatory, void ab inito, hence liable to be struck down.

5. That the official respondent concealed the subsequent seniority list and the appellant was apprised by one of his colleagues on 09.05.2022 that the respondent has prepared a seniority list where his junior most colleagues have been benefited, so the appellant received the same and intended to file the instant appeal just for the rectification his seniority position.

6. That the so called seniority list has been prepared against by violating the rules, law and policy and any promotion on the strength of such allege seniority list would be no value in eyes of law, hence this worthy office having ample power, under the mandate of law to rectify the same, and restore the actual seniority position of appellant as per his entitlement.

7. It also prayed that the appellant has prima facie case and as per law the seniority would be reckoned from the date of initial appointment and thereafter the promotion would be made on the basis of seniority, as evident from the table mentioned *ibid*, the appellant is most senior but he was malafidely deprived from his legal right.

*It is therefore humbly prayed
that on acceptance of the instant
departmental appeal, the position of
appellant may kindly be retained at
serial No.16 of the seniority list and
in pursuance of such position i.e. at*

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Serial No.16, he be promoted to the
post of Instructor Grade-I (B-15) as
per his entitlement.

ii. It is also prayed that the
respondents be restrained from
proceeding/promotions to the post
of Instructor Grade-I BPS-15, till the
final decision of the instant
departmental appeal.

Appellant


GHAUSUR REHMAN

AFFIDAVIT

I, Ghausur Rehman Son of Faqir Khan, resident of Colony
Balambat Timergara District Dir Lower, do hereby solemnly affirm on
oath that contents of this appeal are correct to the best of my
knowledge and belief.


DEPONENT

Dated: 06/06/2022