

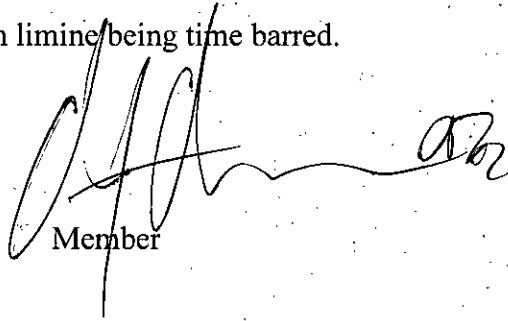
3,  
Appeal No. 468/2014  
Mr. Bharat Gill

28.05.2014

Counsel for the appellant present. Preliminary arguments heard and case file perused. Through the instant appeal the appellant has prayed for directing the respondents to consider the appellant for adjustment against Work Instructor (SET Tech) post BPS-16 from his due date and against not taking action on the departmental appeal filed by the appellant within statutory period.

Perusal of the case file reveals that the appellant has filed departmental appeal on 24.05.2013 and the instant appeal has been filed on 31.03.2014, which is hopelessly time-barred. The appellant should have approached within one month after the lapse of statutory period of 90 days. Counsel for the appellant failed to justify considerable delay in filing the instant appeal. Hence the appeal in hand is dismissed in limine being time barred. File be consigned to the record.

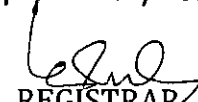

ANNOUNCED  
28.05.2014

  
Member

Form- A  
FORM OF ORDER SHEET

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

Case No. 468/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	31/03/2014	<p>The appeal of <del>M</del> Mr. Banat Gul presented today by Mr. Mukhtiar Ali Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	3-4-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <del>28-5-2014</del>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 468 /2014

Banat Gul

VERSUS

Secretary Education Department and others

INDEX

S NO	DESCRIPTION	ANNEX	PAGE
1.	Grounds of Appeal	-	01 - 03
2.	Affidavit	-	04
3.	Copy of the service book	'A'	05 - 09
4.	Copies of the list and appeal	'B & C'	10 - 22
5.	Copy of the rules	'D'	23
6.	Wakalat Nama (In original)		-

*Bat*  
Appellant

Through:

*Mukhtiar Ali*  
(MUKHTIAR ALI)

Advocate,  
High Court, Peshawar  
Office # FF-20, 5<sup>th</sup> Floor  
Bilour Plaza Peshawar Cantt  
Cell # 0333-9156551

Dated: -28-03-2014

0

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No 468 /2014

Banat Gul, A.W.I GHS Yar Jan Kallay, Mohmand Agency, Peshawar

A.W.I. Peshawar  
484  
31-3-14

(Appellant)

VERSUS

1. Secretary Education, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar
2. Director Education, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar
3. Director Education, FATA Warsak Road, Peshawar

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal, 1974 for directing the Respondents to consider the Appellant for adjustment against W.I (SET Tech) post BPS-16 from his due date and against not taking action on the appeal of Appellant within statutory period

PRAYER-IN-APPEAL:-

On acceptance of this appeal, the Respondents may be directed to consider the Appellant for W.I (SET Tech) post from his due date being eligible and senior most with all consequential benefits. Any other remedy, which this august Tribunal deems fit that, may also, be awarded in favour of Appellant.

Respectfully Sheweth:-

- 1) That the Appellant joined the Education Department as A.W.I in the year 2005. The Appellant was granted BPS-14 in the year 2008 and BPS-15 on 11-9-2008. All entries are

recorded in the service book the copy of which is attached as Annex 'A').

- 2) That the Appellant has passed SSC, DAE (Mech) B.A and M.A. Moreover, the Appellant has more than 9 years service at his credit with good record and results. Qualification are recorded in the service book the copy of which is already attached as Annex 'A').
- 3) That there are many SET Tech teacher, who have been given BPS-16 as W.I SET Tech. post on the basis of B.A and diploma qualification but the Appellant has been kept deprived from the said benefits. Therefore, the Appellant filed departmental appeal for his claim and waited for 90 days but the Appellant has not yet received any reply from the Respondents side till date despite the lapse of statutory period. (Copies of list and appeal are attached as Annex 'B & C').
- 4) That now the Appellant comes to this august Tribunal on the following grounds amongst the others:-

GROUND OF APPEAL:-

- A) That not considering the Appellant for W.I Post and not taking action on the departmental appeal of the Appellant is against the norms of justice and principles of fair play.
- B) That the Appellant has not been treated according to law and rules and has been kept deprived from the benefits of W.I post in an arbitrary manner.
- C) That the Appellant is eligible for W.I post as per rules, therefore, the same cannot be denied to him on the basis of flimsy reasons. (Copy of rules is attached as Annex 'D').
- D) That the Appellant has been discriminated because many officials with the qualification of B.A and Diploma

have been given BPS-16 of W.I post but the same benefits has not been extended to the Appellant.

E) That any other grounds will be raised at the time of arguments with the permission of this Honourable Court.

PRAYER:-

It is, therefore, respectfully prayed that by accepting this Appeal, the Respondents may be directed to consider the Appellant for W.I (SET Tech) post from his due date being eligible and senior most with all consequential benefits. Any other remedy, which this august Tribunal deems fit that, may also, be awarded in favour of Appellant.

Any other remedy not specifically asked for may also be granted.

*[Signature]*  
Appellant

Through: *Mukhtiar Ali*  
(MUKHTIAR ALI)  
Advocate,  
High Court, Peshawar

Dated: -28-03-2014

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No \_\_\_\_\_/2014

Banat Gul  
VERSUS

Secretary Education Department and others

AFFIDAVIT

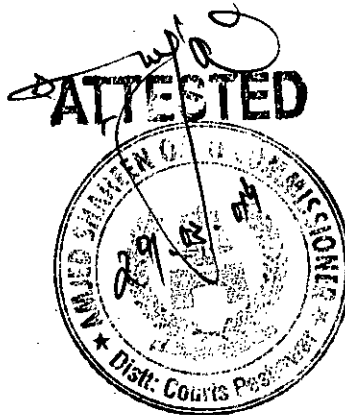
I, Banat Gul A.W.I, GHS Yar Jan Kallay, Mohmand Agency, do hereby solemnly affirm and declare on Oath that all the contents of accompanying appeal are true and correct to the best of my knowledge and nothing has been concealed or withheld from this Honourable Court.

*Banat Gul*  
DEPONENT

Identified by:-

*Mukhtiar Ali*

(MUKHTIAR ALI)  
Advocate  
High Court, Peshawar



No 36 (5) A

Note: The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

736

1. Name: Banat Gul

162

2. Race: Mohmand

3. Residence: Main Killa Shabqada

657

4. Father's name and residence:

1204

Rahat GUL As above

027

5. Date of birth by Christian era as nearly as can be ascertained:

13-11-1976

6. Exact height by measurement:

5-

7. Personal marks for identification:

Mole on right hand.

8. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant:

Ba-S

10. Signature and designation of the Head of the Office, or other Attesting Officer.

*Mohmand Agre*  
Head Master  
G. S. Hall Y. S.  
Mohmand Agre

*M. Ali*

29/13/76



1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "P"	Date of appointment	Signature of Government Servant	Signature and name of the head or other authority in attest column
ALLI post		BPS. No. 9 (2770-165-7720)						
EHS. H-You Jan			Rs. 2770/- PM			7/12/05		
Milli M-Agency								
do-			Rs. 2935/- PM			1/12/06		
		BPS. No. 9 (3185-190-8885 / 4400-31-13550)						
do-	do-		Rs. 3375/- PM			1/7/07		
do-	do-		Rs. 3565/- PM			1/12/07		
		BPS. No. 14 (4100-315-13550/-)						
do-	do-		Rs. 4100/- PM			30/4/08		
do-	do-	BPS. No. 14 (4920-380-16320)						
do-	do-		Rs. 4920/- PM			1/7/08		
		BPS. No. 15 (4350-350-14850 / 5220-420-1-13220)						
		BPS. No. 15 (5220-420-17820)						
			Rs. 4350/- PM			30/4/08		
			Rs. 5220/- PM			1/7/08		
			Rs. 5660/-			12/2008		
			Rs. 6060/-			12/09		
			Rs. 6420/-			12/10		

Signature of Government Servant  
 Signature and name of the head or other authority in attest column  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr  
 He G.H.S. Mohr

Next page

(For use in Police Department only)

Hairs:

1. ① Passed G.C. Exam under the R.No. 9736
2. in 1987 from BISE Peshawar, Securing marks
3. 461/850. result declared on 1987.

Verification Roll No.

dated

*[Signature]*  
 G.S. Haji Yar  
 Mohmand Agency

② Passed DAE (MECH) Exam under the R.No. 10657  
in 1990 from Technical Board Peshawar and obtained  
marks 1729 out of 2000. result declared on  
17-5-1993.

*[Signature]*  
 G.S. Haji Yar  
 Mohmand Agency

Qualification

Date

Qualification

Date

① Passed B.A Exam under  
R.No. 27576 in 2007 from  
University of Peshawar  
Securing marks 1550 and  
placed in 2nd division, result  
declared on 30-4-2008.

First Arts

B.L. Or B.A.

Pleadership examination

Plan-drawing

*[Signature]*  
 G.S. Haji Yar  
 Mohmand Agency

Training School Final examination

④ Passed M.A. (Isl.) Exam: A  
Session 2010 from University  
of Peshawar under R.No. 34277  
obtained marks 636 & was  
placed in 2nd Div. 100  
Result declared on 09.03.2010

Other qualification:-

Finger Print

Drill Instructing

Court Duties

Reserve Duties

*[Signature]*  
 G.S. Haji Yar  
 Mohmand Agency

N.B. Line to be drawn under the qualification possessed.

*[Signature]*

29/3/14

Signature of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
					Period			Government to which debitable
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/11/06	Annual Inc	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	Appointed against AUI post in BPS. No. 9 at GHS-4-Yar Jan Killi Mohmand Agency vide the AEO Mohmand order Endost. No. 19957/dt. 6-12-05		<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency		
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/5/07	Pay revision of 2007	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency					
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/11/07	Annual Inc.	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency					
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	29/4/08	Allowed B-14 being BA 2nd div.	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	Allowed BPS. No. 14 being BA 2nd division vide AEO Mohmand order Endost. 15664-05 dt. 2-6-08.				
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/6/08	Pay revision	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency					
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	29/4/08	Allowed B-15	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	Allowed BPS. No. 15 being BA 2nd division vide AEO Mohmand order Endost. 15664-05 dt. 2-6-08.				
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/6/08	Pay cut	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency					
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/11/08	Annual Inc. 2008	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	Allowed BPS. No. 15 being B.A Qualification vide the AEO Mohmand order Endost. No. 17442-47 dated 11-9-2008.				
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/11/09	Annual Inc. 2009	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency					
<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency	30/11/10	Annual Inc. 2010	<i>[Signature]</i> Head Master G.H.S. Haji Yar Jan Killi Mohmand Agency					

Head Master  
G.H.S. Haji Yar Jan Killi  
Mohmand Agency

*[Signature]*

29/3/14

5

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Permanent Servant	Signature and of the Head or other authority in whom the appointment is made
A. W. J. Post	BPS	95.R. 15 Q	Rs. 5220	Rs. 5220 - 17800		1.12.2011		
S.H. J. J. J. J.	Temp	Rs. 6480/-						
1. G. M. A. J. J.	Temp	Rs. 6480/- p.m				23.5.2011		
		Revised BPS No 15 @	8500-700			29.5.20		
	Do	Rs. 10600/pm				1.7.2011		

8	9	10	11	12	13		14	15
Signature of Government Servant	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination -- such as: promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Nature and duration of leave taken.	Leave Allocation of period of leave & average pay upto four months for which leave is debitable to Government Period Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
<p><i>[Signature]</i></p>	<p><i>[Signature]</i> Head Master G.H.S. Hui Yee Jan K28 Mokwan Agency</p>	<p>30-11-2010 25-5-2011 30-6-2011</p>	<p>Transfer</p>	<p><i>[Signature]</i></p>	<p>OPTION</p>	<p>Mr. Anant Raj Ahir is here by opt for refixation of only pay</p> <p>Seg =</p> <p>TR 274 16/9/08 Drawn by 1430/08 error of dup + HRA in Ak 7 B-15. cont 2-12-07 631/08 Services verified with 12/08 to 30/11/2008 from the relevant record of this office.</p> <p><i>[Signature]</i> Head Master G.H.S. Hui Yee Jan K28 Mokwan Agency.</p> <p>Services verified with 2/5 to 30/11/10 from the record of this office.</p> <p><i>[Signature]</i> Head Master G.H.S. Hui Yee Jan K28 Mokwan Agency.</p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>

ATT  
29/3/14  
DPY



9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
					Period		
					<p>Service verified ref. 112 to 2305 from the records of this school.</p> <p>2011</p>	<p>12 to 2010</p>	

*M. H. ...*  
 HEADMASTER  
 G.H.S. Haji Yar Jaa Killi  
 Mohmand Agency

*M. Ali*  
 ATTEST  
 29-3-14

7

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant	Signature and Date of the head of the office in attestation columns 1



(For use in Police Department only).

Recs.

- 1.
- 2.
- 3.

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

Left thumb-impresion.

Qualifications	Date	Qualifications	Date
Course completed at GATTIC			
English Gul Bahar - peshawar w.e.f - 1-2-87 To 29-2-87		First Arts	
(v) Pashtu course completion from		B. L. or B.A.	
Urdu Govt Agro Technical Training Centre peshawar w.e.f. 1-2-87 To 29-11-1987		Pleadership examination	
Plan-drawing		Training School final examination	
Finger print		Other qualifications	
Drill instructing		Completed 3 years programme of Institution in Automobile technology in 1970 securing 1970 marks out of 3650 marks, placed in 2nd Division under Roll No: 12106.	
Court duties			
Reserve duties			

M  
 REPRODUCED TO BE TIME COPY  
 29-3-14

sd: \_\_\_\_\_  
 Headmaster  
 GHS Azizai

(11)

Note.—The entries in this page should be renewed or re-attested at least every five years, and the signature in lines 9 and 10 should be dated.

1. Name — *Mr. Abdur Rahim* ✓

2. Race —  *Afghan*  ✓

3. Residence — *vill. Katagai Charsadda Peshawar.* ✓

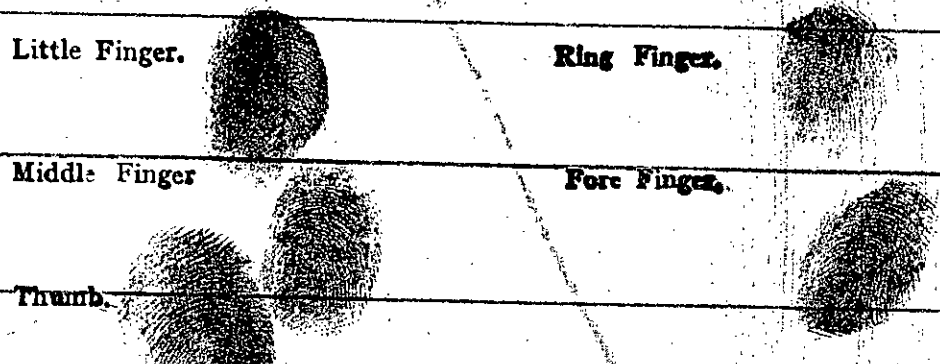
4. Father's name and residence *Mr. Mohammad Rahim* ✓

5. Date of birth by Christian era as nearly as can be ascertained *(15-2-1950) ✓*  
*Fifteenth February M.H.V. Fifty only*

6. Exact height by measurement — *5-6* ✓

7. Personal marks for identification — *Face & fore head full of small fox scars.* ✓

8. Left hand thumb and finger impression of (non-gazetted) officer



9. Signature of Government servant — *Abdus. Rahim* ✓

10. Signature and designation of the Head of the Office, or other Attesting Officer *Sd: Headmaster S.H.S. Katagai*

*Shahzad Khan*  
 Govt. High School, Katagai  
 District Agency.

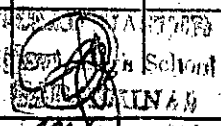
*M. Ali*  
 ATTESTED TO BE TRUE COPY  
 2-9-3-14

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Signature designation head of the other the officer in at of column
Abdur Mahim A.W!								
G.H.S. Ali Zai	M/Tamp		200/- PM			30.10.76 (EN)	Abdur-Rab	sd/ Head G.H.S. A
A.W!								
G.H.S. Teram	do		200/-			1.1.77	Abdur-Rab	sd/ Head G.H.S.
		Revised N.P.S. NO. (S) 320-16-514/18-640						
do	do		386/-			1.5.77	Abdur-Rab	sd/ Head G.H.S.
G.H.S. porachinor Kurrum Agency	do		402/-			1.12.77	Abdur-Rab	sd/ Head G.H.S.
do	do		402/-			18.5 78 (EN)	Abdur-Rab	sd/ H/M G.H.S. Kurr
		Revised Entered in the N.P.S No-14/RS-520-30-730/35-10/10						
M. Abdur Rabine, W 9 G.H.S. porachinor Kurrum Agency	do	awarded W-2-f: 1-4-1978	520/- P.M			1.9 1978	Abdur-Rab	sd/ H/M G.H.S. P Kurr
do	do		520/- P.M			1.12 78	Abdur-Rab	per W
do	do		550/- P.M			1-7-78	Abdur-Rab	sd/ H/M G.H.S. Kurr

ATTESTED TO BE TRUE COPY  
24-3-14

Entries upto this page verified with the original entries of the original S/Books and found correct and are attested herewith

ATTESTED  
Shahzad Khan  
Govt. High School Kher



9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
Sd/- Headmaster S.H.S. Ali Zai	31/12/76 (AN)	Transfer	Sd/- Headmaster S.H.S. Ali Zai				Appointed as A.W. on No. 200/PTI Fixed in the N.P.S. (8) vide DE, FATA, Pesh: Endst No. 7943-46/8-1 dt 26.10.76.
Sd/- Headmaster S.H.S. Teran	30/7/77	Revision of Pay	Sd/- Headmaster S.H.S. Teran				Service verified from 30.10.76 to 31.12.76 from the relevant office record.
Sd/- Headmaster S.H.S. Teran	30/11/77	Inc.	Sd/- Headmaster S.H.S. Teran				Sd/- Headmaster S.H.S. Ali Zai
Sd/- Headmaster S.H.S. Teran	17/4/78 (AN)	Transfer	Sd/- Headmaster S.H.S. Teran				T-106 10.9.78
Sd/H/M G.H.S. Parachinar Kurram Agency							Appear on A/c of pay fixation in the Revised N.P.S. 1977 w.e.f. 1/5/77 To 31/2/77 No. 333/- + T-allowances w.e.f. 30.10.76 to 30.4.77 No. 252/58 Total Rs. 575/58 drawn vide T-106 dt 10.9.77.
Sd/H/M G.H.S. Parachinar Kurram Agency							Service verified w.e.f. 1.1.77 to 30.11.77 from the Acq. Bill & other school record.
Sd/H/M G.H.S. Parachinar Kurram Agency							Service verified w.e.f. 1.12.77 to 17.4.78 from the office copies of the pay bill & other relevant record of this school.
Sd/H/M G.H.S. Parachinar Kurram Agency							Sd/- Headmaster S.H.S. Teran
Sd/H/M G.H.S. Parachinar Kurram Agency							Rs 377/58 over-payment o/a of Teaching allowance etc may please be recovered.
Sd/H/M G.H.S. Parachinar Kurram Agency							Sd/- A.A.O. Kurram

Mr. Akbar Rahim  
3 years' Diploma holder working in the post of W.D. is hereby permitted to draw Rs 520/- pm fixed plus other personal allowances vide D.E. of FATA, NWFP. Peshawar No: 14640/ dated 15.7.1978.

Scale No: 14 for 1.4.78 to 31.7.78, promoted following rates:  
 Rs 520 - Rs 402/- = 118/- x 4 = 472/-  
 House Rent 52/- x 4 = 208/-  
 Total Rs 532/-  
 Less B. Fund Rs 528/-  
 T. 204 of 1.8.78. 4/-  
 318/81 (AN) Trp

Service verified from 1.4.78 to 31.7.78, promoted following rates:  
 Rs 520 - Rs 402/- = 118/- x 4 = 472/-  
 House Rent 52/- x 4 = 208/-  
 Total Rs 532/-  
 Less B. Fund Rs 528/-  
 T. 204 of 1.8.78. 4/-  
 318/81 (AN) Trp

Shahzad Khan

29-3-14 A.M. bc

ATTESTED

9	10	11	12	13	14	15
				Leave		
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer
					Period: Government to which debitable	
				Services Verified w.e.f. 18-4-78 to 31-12-79 from the Acquittances & the record of the School Sd/+++ Head Master G.H.S. pora chimer KURRAM AGENCY	Service Verified w.e.f. 1-12-77 to 17-4-78 (R.A.) from the office copies of the pay bills & other relevant record of this School Sd/+++ Head Master Govt. High School Zeran Kurram Agency.	
				T. No. 204 ✓ 1-8-78 Services Verified w.e.f. 1-1-80 to 31-8-81 from the Acquittances & the record of the School Sd/+++ Head Master G.H.S. pora chimer Kurram Agency	Agreed on date of promotion to W.I post Scale No-14 from A-W.I Scale No-8 w.e.f. 1-4-78 to: 31-7-78 diff. drawn on the following notes (Rs. 520 - 402 = Diff: 118 x 4 = 472) Total Rs. 532 (-) 4 BF 528/- vide T. No. 204 dt: 1-8-78 Sd/+++ Agency Accounts officer Kurram Agency	
				Rest & Rec. Allow - 1980 equal one month pay viz Rs. 260/- H. pay admitted for payment during the month 1/81 vide T. No. - 87 dated: 3-1-1981 Sd/+++ Agency Accounts officer Kurram Agency	R.R Allowance for the year 1978 (H. pay) Rs. 260/- Drawn vide T. No. 523 dated: 29-12-78 ✓ Sd/+++ Agency Accounts officer Kurram Agency	
					Rest & Recreation Allowance 1979 equal to one month pay viz Rs. 264/- H. pay admitted for payment during the month 12/79 vide T. No. - 1025 dated: 19-12-79 Sd/+++ Agency Accounts officer	

Attested  
Shahzad Ahmad

29-3-14

15

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating state— (a) substantive appointment or (b) whether service counts for pension— under Art. 371, C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
Workshop Instructer G.H.S Akhroorwal F.R Rohat	off/prop	1 7/81	Rs 520/ P.M fixed	2 7/81 (Transit days)		3 9/81	Abdur-Rahim
W.S Post G.H.S Subhon Khawar Muhammad Azeem - do -			Rs 520/- P.M fixed			9-6-82	Abdur-Rahim
- do -	- do -	B.P.S No-14 Rs 850-50-1850	Rs 850/- P.M fixed			1-7-83	Abdur-Rahim
850-50-1850 900-55-2000 W.I	- do -		Rs 900/- fixed			1-7-83	Abdur-Rahim

Sd/-  
H/M  
G.H.S  
F.R

Sd/-  
H/M  
G.H.S  
Muhammad

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29-3-14  
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Service  
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9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government		
					Period		
sd/H-1 H/M G.H.S Akhbarwal F.R Kohat	8-6-82	Transfer	sd/H-1 Head Master G.H.S Akhbarwal F.R Kohat			Services Verified w.e.f. 1-7-81 to 30-11-81 from the Acquittance & the record of the School sd/H-1 Head Master G.H.S Akhbarwal F.R Kohat	
			T-318 13-3-82 Drawn Rs. 200/- R.A. Receipt for 1982 sd/H-1 D.A.O Kohat			Services Verified w.e.f. 1-12-1981 to 8-6-82 from the Acquittance & the record of the School sd/H-1 Head Master G.H.S Akhbarwal F.R Kohat	
sd/H-1 H/M G.H.S Subhan Khawar Muhammad Agyey	30/6/83	placed provisionally with B.P.S No-14 1983	sd/H-1 H/M G.H.S Subhan Khawar Muhammad Agyey			UNDER TAKING I, Mr. Akhbar Rabbani, is hereby given under taking to the effect that if any over payment is made to me as a result of fixation of pay in the B.P.S 1983. The amount of over payment will be recovered from my pay/provident gratuity. sd/H-1 Govt. servant Akhbar-Rabbani	
		allowed scale pay fixed in the B.P.S. 14 Rs 850/- P.M fixed 1-7-83 with cutting attested with Government on 1-12-83 being fixed pay.	Agency Accounts officer Muhammad Ghullani	Agency Accounts officer Muhammad Agyey Ghullani			
		Drawn Rs. 1080/- w/c correct diff of pay 9 HRA w.e.f. 1-7-83 to 31-12-84 vide B.P.S. No-307 dt. 24-3-85					
		Services Verified w.e.f. 9-6-82 to 10-10-86	sd/H-1 Agency Accounts officer Muhammad Ghullani			sd/H-1 Head Master G.H.S Subhan Khawar Muhammad Agyey	
		sd/H-1 H/M G.H.S Subhan Khawar Muhammad Agyey					
		10-10-86 Transfer	sd/H-1 H/M G.H.S Subhan Khawar Muhammad Agyey				

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29-3-14  
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sd/H-1  
Head Master  
G.H.S Subhan Khawar  
Muhammad Agyey  
Govt.

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating - state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. B. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
W. I. G. H. S. Kler Byjuer Agency	7/1/87		Rs. 850/- P.M.			11/10/86	M. K. R.
-db-	-db-		B.P.S No-15/900-55-2000 Rs. 900/- P.M. Fixed			26/6/87	M. K. R.
-db-	-db-	Revised	B.P.S No-15-1165-71-2585			17/87	M. K. R.
			Rs. 1165/- P.M. Fixed				M. K. R.

H. Ali  
 ATTENTION TO BE PAID COPY  
 27-3-14

P. D. O.

Signature of other officer in charge of column

Govt. of India

Govt. of India

Govt. of India

Govt. of India



9	10	11	12	13	14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promo, on, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average for up to four months for which leave salary is payable to another Government		
				Period	Government to which desirable		
<p><i>S.R.</i>  <i>N.M.</i>            Head Master            Govt. High School            Bahawalpur</p>	<p>25/11/86            25/87</p>	<p>Revised            B.P.S No-15</p>	<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p>Services rendered from 11-12-86            to 31-1-87            &amp; the record of the School</p>		
<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>	<p>30/6/87</p>	<p>Revised            B.P.S</p>	<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>	<p>Sanctioned grant of            Study leave w.e.f. 1-2-87            to 30-11-87 vide Director of            Education (F.A.P.A.) New P.P.            Endust No-14287-88/-            Dated: 27-4-87</p>	<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		
<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p>Allowed B.P.S-15 &amp;            workshop instructors            vide Govt of N.W.F.P            Finance Department            No-FD (SR-E) 2-45/75            Dated: 25-6-87</p>	<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		
<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p>30/11/87</p>	<p><i>S.R.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p><u>UNDER TAKING</u>            I, Mr. Abdul Rukh, w/o            S/o Abdul Rukh            hereby give an undertaking            to the effect that I will make            good for my pay &amp; pension            etc. if any over payment            made to me as a result            of my fixation of pay scale            No-FD (P.P.O) 1-187-VII            under pay rules 1987</p>		
<p><i>M. H.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p>30/11/87</p>	<p><i>M. H.</i>            Head Master            Govt. High School            Bahawalpur</p>		<p>Sig. of Govt. servant Abdul-Rukh</p>		
<p><i>M. H.</i>            Head Master            Govt. High School            Bahawalpur</p>			<p>ATTESTED TO ORIGINAL COPY            29-3-14</p>		<p><i>M. H.</i>            Head Master            Govt. High School            Bahawalpur</p>		
<p><i>M. H.</i>            Head Master            Govt. High School            Bahawalpur</p>			<p>ATTESTED</p>		<p><i>M. H.</i>            Head Master            Govt. High School            Bahawalpur</p>		

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
W.T. A.H.S. Khan Bajur Agency	Off/Temp			Rs. 1187 PM FDIA		12/87	Abdur. Rabb
W.T. post / S.B.T. Pathan A.H.S. Khan Bajur	-10-			Rs. 1236 PM		12/87	

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9	10	11	12	13		14	15	
Signature and designation of the head of the office or other attesting officer in attestation at columns 1 to 4				Leave		Reference to any recorded punishment or censure, or reward or praise of the Government servant		
Date of termination of appointment				Nature and duration of leave taken		Signature of the head of the office or other attesting officer		
Reason of termination (such as promotion, transfer, dismissal, etc.)				Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government		Period to which debarable		
<p><i>Shahzad Khan</i></p> <p>11-M</p> <p>Govt. Agency</p>						<p>Approval of U.P.A. for the period from 1-12-87 to 31-7-87 amounting to Rs. 450/- @ Rs. 75/- p.m drawn vide T. No-243 dated: 5-9-87</p> <p>Sd/- Agency Accounts officer Bijaur Agency at Khar</p>		
<p>11-M</p>						<p>Services Verified w.e.f. 1-2-87 to 30-11-87 &amp; the record of the school</p> <p><i>Shahzad Khan</i></p> <p>Headmaster Govt. Agency at Khar Bijaur Agency.</p>		
<p>PL 382 dt 18/4/88</p> <p>Approval of one month on A/L approval for the S.T. W.O. 1-12-88 to 31-3-89 drawn Rs. 292/-</p> <p>Sd/- A.A.O. Bijaur Agency</p>						<p>Approval in B.P.S. 15 at S.E.T. Circle with Direction of schools N.W.F. Peshawar. Endest No-7453-912/A-14 S.E.T. approval dated Peshawar No 25-3-1989 on S.No.6-W.O. 9-2-1988.</p> <p>11-M</p>		
<p>Attn</p> <p>ATTENDED COPY</p> <p>29-3-14</p>						<p>Service Verified w.e.f. 1-12-87 to 30-11-1988 from the Reg. &amp; the record of the School.</p> <p>Sd/- Headmaster Govt. Agency at Khar Bijaur</p>		

OFFICE OF THE AGENCY EDUCATION OFFICER

MOHMAND AGENCY

NO 15056 / DATED 4/9/ /2013

(31)

To,

The Director of Education (FATA)  
K.P.K Peshawer.

Subject. APPLICATIONS

Memo,

Enclosed Please find herewith an applications in respect of the following teachers regarding appeals submitted for further favourable Consideration Please.

1. Said ur Rehman AWI.
2. Banat Gul AWI.

Agency Education Officer  
Mohmand Agency.

*[Handwritten signature]*

*[Handwritten signature]*  
*[Handwritten signature]*  
*[Handwritten signature]*  
09/9/13  
*[Handwritten signature]*

5209  
Dated 9/9/13.

ATTESTED TO BE TRUE  
29-3-14

*Reviewed with E-6*  
30/9/2013

pal - 26, 78

To,

The Director  
Education FATA  
Khyber Pakhtunkhwa Peshawar.

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4/9/2013

Subject: APPT REPRESENTATION / DEPARTMENTAL APPEAL TO  
CONSIDER THE APPELLANT FOR W.I (SET TECH) POST  
FROM HIS DUE DATE

Respected Sir,

1. That the appellant joined the education Department as A.W.I in the year 2005.
2. That appellant was granted BPS-14 in the year 2008 and BPS-15 on 1th September, 2008.
3. That appellant has passed SSC DAE BA and MA and the appellant has more than 7 years' service at his credit.
4. That there are many Set Teacher, who have been given BPS-16 as W.I Set Teacher post on the basis of B.A and diploma qualification, but the appellant has been kept deprived from the said benefit.

It is therefore, prayed that on acceptance of this departmental appeal, appellant be granted W.I (Set Tech) post from his due date along with all consequential benefits.

Applicant

*Bad*  
(Banat Gul)

A.W.I  
R/O G.M.S Gul Badshah Kor  
Mohmand Agency

Dated: 24th May, 2013

*I have no objection  
on the applicant*

*for this*

ATTN

M *Al*

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24-3-14

(Better copy.)

(23)

Amir - D

GOVERNMENT OF N.W.F.P  
FINANCE DEPARTMENT  
No. FD (SR-I) 2-45/75-VI  
Dated Peshawar, the 2<sup>nd</sup> Aug, 1982

To,

The Secretary to Government of  
N.W.F.P Education Department,  
Peshawar

Subject:- GRANT OF SELECTION GRADE TO SCHOOL TEACHERS

Sir,

In continuation of this Departmental letter No SO (SR-I) FD/2-45/75-V dated 17.6.1982, I am directed to say that in exercise of the powers conferred by Section 26 of the N.W.F.P Civil Servant Act 1973, the Governor, N.W.F.P is pleased to decide as under:-

- a. 30% posts of Theology Teachers (Dinyat Teachers) and Qaris (RNPS-6) shall be allowed selection grade (RNPS-8) on regular basis.
  - b. 40% posts of the Senior Vernacular Teachers/original Teachers/Drawing Masters/Physical Education Teachers (physical Training Instructors) and Assistant Workshop Instructors (RNPS-8) shall be allowed selection grade (RNPS-11) on regular basis.
  - c. 30% posts of Workshop Instructors (RNPS-14) shall be allowed the selection grade (RNPS-16) on regular basis.
2. These orders will take with effect from is July, 1982.
  3. The schedule appended to the N.W.F.P Civil Services Pay Revision Rules, 1978 shall be deemed to have been amended due to the mentioned noted above.

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AW  
ATTESTED TO BE TRUE COPY  
29-3-14

Your obedient servant

(MOHAMMAD AMIN)  
ADDITIONAL FINANCE SECRETARY-I  
FINANCE DEPARTMENT

(23)

GOVERNMENT OF N.W.F.P. FINANCE DEPARTMENT.

No. FD(SR-I) 2-45/75-VI

Dated Peshawar, the 2nd Aug 1982

*Amir D*

The Secretary to Government of N.W.F.P. Education Department, Peshawar.

GRANT OF SELECTION GRADE TO SCHOOL TEACHERS.

Sir,

In continuation of this Departmental Order No. 20(SR-I) FD/2-45/75-V dated 17.6.1982, I am directed to say that in exercise of the powers conferred by Section 26 of the N.W.F.P. Civil Services Act, 1973, the Governor, N.W.F.P. is pleased to direct as under :-

- a. 30% posts of Theology Teachers (Diyas Teachers) and Qaris (RNPS-6) shall be allowed selection grade (RNPS-8) on regular basis.
- b. 30% posts of Senior Vernacular Teachers/Oriental Teachers/Drawing Masters/Physical Education Teachers (Physical Training Instructors) and Assistant Workshop Instructors (RNPS-8) shall be allowed selection grade (RNPS-11) on regular basis.
- c. 30% posts of Workshop Instructors (RNPS-10) shall be allowed selection grade (RNPS-16) on regular basis.

2. These orders will take effect from 15 July, 1982.

3. The schedule appended to the N.W.F.P. Civil Services Pay Revision Rules, 1978 shall be deemed to have been amended to the effect mentioned above.

Your obedient servant,

*(Signature)* 2/8/82  
(MOHAMMAD HAFIZ)  
ADDITIONAL FINANCE SECRETARY-I,  
FINANCE DEPARTMENT.

Dated Peshawar, the 2nd Aug 1982.

Encl. No. FD(SR-I) 2-45/75-VI

Copy forwarded for information :-

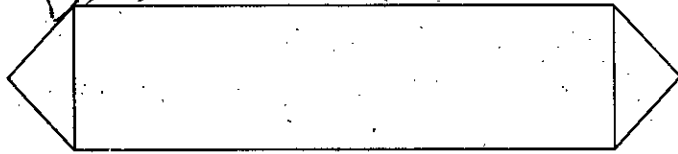
- 1. The Accountant General, N.W.F.P. Peshawar.
- 2. All District/Agency Accounts Officers in N.W.F.P.
- 3. The Treasury Officer, Peshawar.

*(Signature)*  
(IFTIKHAR HUSSAIN)  
SECTION OFFICER (SR-I)  
P.T.O. FINANCE DEPARTMENT.

Lect/Senior Instructor

24-3-14

بعدالت جہاں سروس کنزرویٹو رپورٹ



مورخہ 26 مارچ 2014ء

مقدمہ

بنام K.D. O. E.T. 10/11/13

دعویٰ

مقدمہ

دعویٰ

جرم

## باعث تحریر آنکد

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے

اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائہ التوائے مقدمہ کے

سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2014

ماہ مارچ

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المرقوم

العبد گواہ العبد

کے لئے منظور ہے۔

مقام

Accepted by  
Mukhtiar Advocate

26/3/14