

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**  
**AT CAMP COURT ABBOTTABAD.**

Service Appeal No. 778/2018

Date of Institution ... 21.05.2018

Date of Decision ... 22.09.2021

Ishtiaq Ahmed S/O Said-ur-Rehman SSTG  
R/O Village and Post Officer Sherwan Presently Govt. Middle School  
Marri Tehsil Havelian District Abbottabad.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Elementary &  
Secondary Education, Khyber Pakhtunkhwa, Peshawar and three  
others.

... (Respondents)

-----  
Mr. MUHAMMAD ARSHAD KHAN TANOLI,  
Advocate

--- For appellant.

MR. USMAN GHANI,  
District Attorney

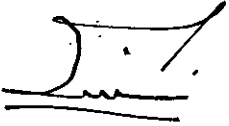
--- For respondents.

MR. SALAH-UD-DIN  
MR. ATIQ-UR-REHMAN WAZIR

--- MEMBER (JUDICIAL)  
--- MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:-

  
Precise facts forming the background of the instant service appeal are that the appellant was appointed as untrained PTC (PST) vide appointment order dated 27.12.1987 and served as such till 12.03.1993. The appellant was later on appointed as Certified Teacher (C.T) and assumed charge on 13.03.1993. Vide Finance Department (Regulation Wing) letter dated 30.10.2009, grant of annual increment without arrears was allowed to untrained teachers, however the appellant was not granted such annual increment for the

period from 28.12.1987 till 12.03.1993, during which he performed his duty as untrained PST teacher. The departmental appeal of the appellant went un-responded, therefore, he approached this Tribunal through filing of the instant service appeal for the redressal of his grievance.

2. Notices were issued to respondents, who submitted their comments, wherein they refuted the contention of the appellant.

3. Learned counsel for the appellant has argued that the appellant has served as PST teacher for the period from 28.12.1987 and served as such till 12.03.1993, therefore, in light of Finance Department (Regulation Wing) letter dated 30.10.2009, the appellant was entitled for annual increment regarding the aforementioned period, however the respondents did not grant the same to the appellant with malafide intention; that as per the service book of the appellant, his service period as PST has been counted towards his service, after appointment of the appellant as C.T; that the respondents are wrongly and illegally not granting the due annual increment to the appellant, therefore, the appeal may be accepted and the respondents may be directed to grant due annual increment to the appellant.

4. On the other hand, learned District Attorney for the respondents has argued that the concerned annual increment was allowed only to those untrained teachers, who were appointed on fixed pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully; that the appellant was neither regularized on the PST post nor he has completed the requisite training successfully, therefore, he is not entitled to the concerned annual increment; that the appellant was not entitled to the concerned annual increment, therefore, the appeal in hand may be dismissed with costs.

5. Arguments heard and record perused.

6. A perusal of the record would show that initially Finance Department (Regulation Wing) issued letter No. FD(PRC) 5-2/2002 dated 30.10.2009 regarding grant of annual increment/Running pay

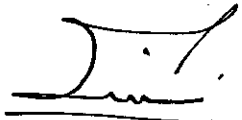
to untrained teachers in the light of the Supreme Court judgment. Later on vide Finance Department (Regulation Wing) letter dated 30.10.2009, the aforementioned letter was modified and the relevant para-I of the same is reproduced as below:-


*" i) All those untrained teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointment as such, but without arrears."*

The appellant was though initially appointed as untrained PST on fix pay, however the appellant was neither regularized against such post nor he has produced any documentary proof, which could show that the appellant had acquired the requisite training successfully. The appellant has thus not fulfilled the criteria required for grant of annual increment in light of the letter of Finance Department (Regulation Wing) dated 30.10.2009. The service period of the appellant as untrained PST has though been counted towards his service as C.T after his appointment as such, however the same cannot entitle him to grant of the concerned annual increment.

7. In view of the above discussion, the instant appeal being devoid of merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
22.09.2021

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT ABBOTTABAD

ORDER  
22.09.2021

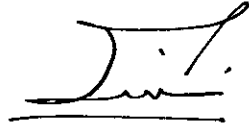
Mr. Mohammad Arshad Khan Tonali, Advocate, for the appellant present. Mr. Zubair Ahmed, Litigation Officer alongwith Mr. Usman Ghani, District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, instant appeal being devoid of merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
22.09.2021



(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT ABBOTTABAD



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

19.01.2021

. Due to COVID-19, the case is adjourned for the same on 17.02.2021 before D.B.

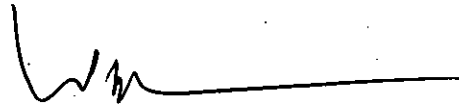
  
READER

17.02.2021

Appellant present though counsel.

Noor Zaman Khattak, learned District Attorney alongwith Sohail Ahmad Zeb Litigation Officer for present.

Former made a request for adjournment; granted. To come up for arguments on 21.04.2021 before D.B for arguments at Camp Court, Abbottabad.



(Atiq ur Rehman Wazir)  
Member (E)  
Camp Court, Abbottabad



(Rozina Rehman)  
Member (J)  
Camp Court, Abbottabad

21-4-21

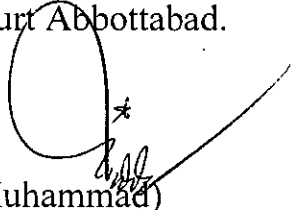
Due to covid 19, the case is adjourned to 21-4-2021 for the same.

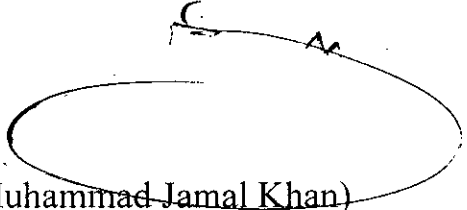
  
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16.11.2020

Assistant to counsel for the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Sohail Ahmad Zeb, Assistant (Litigation) for respondents present.

The Lawyers community is not appearing in the Tribunal for the reason that they are observing sough of the Hon'able Chief Justice, Peshawar High Court, Peshawar, therefore, the case is adjourned to 19.01.2021 for arguments before D.B at camp court Abbottabad.

  
(Mian Muhammad)  
Member(E)

  
(Muhammad Jamal Khan)  
Member(J)  
Camp Court Abbottabad

22.01.2020

Clerk to counsel for the appellant present. Written reply on behalf of respondents No.1 to 3 still awaited. Sohail Ahmad Zeb Litigation Officer representative of the said respondents present and seeks time to furnish reply. Granted. To come up for written reply/comments on 19.02.2020 before S.B at Camp Court Abbottabad.



Member  
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.

Reader

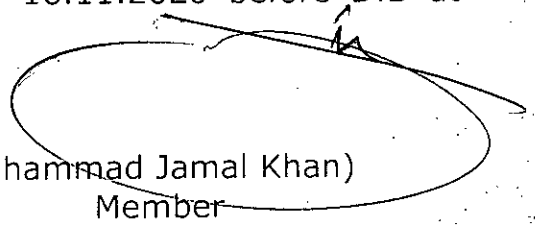
Due to summer vacation case to come up for the same on 11/9  
9 / 20 at camp court abbottabad.



Reader

14.09.2020

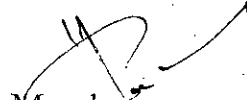
Mr. Muhammad Arshad Khan Tanoli, Advocate for appellant is present. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Sohail Ahmad Zeb, Assistant Litigation are also present. Representative of the department submitted joint para-wise comments on behalf of respondents No. 1 to 4, which is placed on record. File to come up for rejoinder and arguments on 16.11.2020 before D.B at Camp Court, Abbottabad.



(Muhammad Jamal Khan)  
Member  
Camp Court Abbottabad

19.11.2019


Learned counsel for the appellant present. Written reply not submitted. Sohail Ahmad Zaib representative of the respondents No.1 to 3 present and seeks time to furnish written reply/comments. No one present on behalf of respondent No.4. Notice be issued to respondent No.4 for submission of written reply/comments. To come up for written reply/comments on 19.12.2019 before S.B at Camp Court, Abbottabad.

  
Member

Camp Court, A/Abad

19.12.2019

Due to general strike of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Mr. Zia Ullah, Deputy District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant for respondents No. 1 to 3 present. Representative of respondents No. 1 to 3 requested for further time to file written reply/comments. Neither written reply on behalf of respondent No. 4 submitted nor his representative is present, therefore, notice be issued to respondent No. 4 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Case to come up for written reply/comments on 22.01.2020 before S.B at Camp Court Abbottabad.

  
(Muhammad Amin Khan Kundi)

Member

Camp Court Abbottabad



21.08.2019

Learned counsel for the appellant present.  
Preliminary arguments heard.

Learned counsel for the appellant argued inter-alia that the appellant would press the present service appeal for the grant of annual increments of untrained period w.e.f 28.12.1987 to 12.03.1993 without arrears on the strength of Notification of Finance Department (Regulation Wing) No.FD (PRC) 5-2 /2002 Dated 30.10.2009.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 23.10.2019 before S.B at Camp Court, Abbottabad.




Member  
Camp court A / Abad

23.10.2019

Counsel for the appellant present. Learned counsel for the appellant has submitted an application for extension of time to deposit security and process fee. Application is accepted. The appellant is directed to deposit security and process fee within three days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 19.11.2019 before S.B at camp court, Abbottabad.

Appellant Deposited  
Security Process Fee  
23/10/19




Member  
Camp court, A/Abad

22.03.2019


Learned counsel for the appellant present. Heard.

The present application for restoration of the Service Appeal No.778/2018 was filed well within time, hence for the reasons mentioned therein and in the interest of justice the present application is accepted, resultantly the above mentioned service appeal is restored. To come up for preliminary hearing in service appeal mentioned above on 21.05.2019 before S.B at Camp Court A/Abad. Further proceedings shall be conducted in the main service appeal.

  
Member  
Camp Court A/Abad


21.05.2019

Counsel for the appellant present. Original record is not available before the court therefore, office is directed to requisition the original record on the next date. Adjourned to 08.07.2019 before S.B at Camp Court Abbottabad.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

08.07.2019

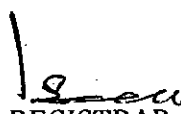


Counsel for the appellant present. Arguments on restoration application heard. Record reveals that the appeal was dismissed in default on 18.12.2018. The appellant submitted application for restoration of appeal on 31.12.2018, the same is well within time therefore, restoration application is accepted. Case to come up for preliminary hearing on 21.08.2019 before S.B at Camp Court Abbottabad.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

## FORM OF ORDER SHEET

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

Misc. Application No. 475/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	31/12/2018	<p style="text-align: center;">The application for restoration of appeal No. 778/2018 submitted by Mr. Ishtiaq Ahmad through Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <div style="text-align: right;">   <b>REGISTRAR</b> 31/12/18         </div>
2-	25-1-19	<p style="text-align: center;">This Misc. application be put up before Touring Abbottabad Bench on <u>21-03-19</u></p> <div style="text-align: right;">   <b>CHAIRMAN</b> </div>
21.03.2019		<p style="text-align: center;">Clerk to counsel for the applicant present. Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 22.03.2019 before S.B at Camp Court A/Abad</p> <div style="text-align: right;">   <b>Member</b>  <b>Camp Court A/Abad</b> </div>



DFA

Ishtiaq Ahmad

21.05.2019

Counsel for the appellant present. Original record is not available before the court therefore, office is directed to requisition the original record on the next date. Adjourned to 08.07.2019 before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

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

Restoration Application.No. 475 /2018  
in  
Service Appeal No. 778/2018

Ishtiaq Ahmad S/o Said Ur Rehman SSTG Resident of Village & Post Office  
Sherwan Presently Govt. Middle School Marri Tehsil Havelian District  
Abbottabad

V/S

Secretary E&SE Peshawar & Others.

**INDEX**

S.No.	Documents	Annexure	Page No.
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Petitioner

Ishtiaq Ahmad

Through

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR****Khyber Pakhtukhwa  
Service Tribunal**Diary No. 2333Restoration Application.No. 475 /2018Dated 31-12-2018

Service Appeal No. 778/2018

Ishtiaq Ahmad S/o Said Ur Rehman SSTG Resident of Village & Post Office  
Sherwan Presently Govt. Middle School Marri Tehsil Havelian District  
Abbottabad

**VERSUS**

1. Government of KPK through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Peshawar.
3. District Education Officer (Male) Abbottabad.
4. District Accounts Officer District Abbottabad.

APPLICATION FOR RESTORATION OF CAPTIONED APPEAL.DISMISSED FOR NON PROSECEUTION.Respectfully sheweth:

1. That the captioned case was subjudice before this Hon'able Court Abbottabad Bench, wherein the instant case was fixed for hearing, but was dismissed for non prosecution vide order dated 18/12/2018.
2. That the said appeal was not mentioned in the Diary of the Counsel of the appellant.
3. That neither any notice nor any summon has been served upon the appellant nor his counsel, therefore the appellant as well as his counsel were totally unaware of the date fixed. Therefore, the counsel for the appellant could not appeared before the Hon'able Tribunal on 18.12.2018.
4. That the absence of the appellant as well as his counsel of the date fixed was neither intentional nor deliberate mistake on their part.
5. That the valuable rights of the appellant are involved in the matter and for meet the end of justice, the restoration of the case is just and equitable.

6. That the present application is in time and there is no legal impediment in restoration of the case.

Therefore, it is humbly prayed that the captioned appeal may be restored and thereafter adjudicated on merits.

Petitioner

Through

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

Dated 31.12.2018

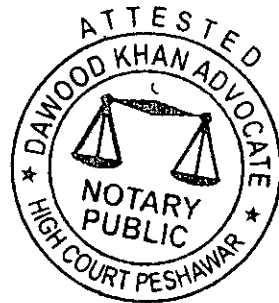
**AFFIDAVIT**

It is stated on oath that the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court.

Deponent

Through

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad



31 DEC 2018





**THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,**  
**PESHAWAR**



Service Appeal No. 778 /2018

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 745

Dated 21-5-2018

Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office  
 Sherwan Presently Govt. Middle School Marri Tehsil Havelian District  
 Abbottabad.

**...APPELLANT**

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Abbottabad.
4. District Account Officer District Abbottabad.

**...RESPONDENTS**

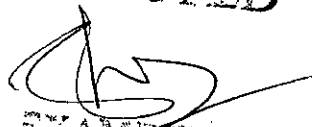
Filed  
 Someday  
 Registrar  
 21/5/18

Re-submitted to day  
 and filed.

Registrar  
 21/5/18

**SERVICE APPEAL** UNDER ARTICLE 4 OF KPK  
 SERVICE TRIBUNAL ACT, 1974, FOR  
 DECLARATION TO THE EFFECT THAT THE

**ATTESTED**

  
 EXAMINER  
 Khyber Pakhtunkhwa  
 Service Tribunal,  
 Peshawar

18.12.2018

Nemo for appellant.



It is already 2.30 PM and the case has been called several times, despite, no one is in attendance on behalf of the appellant.

Dismissed for non-prosecution. File be consigned to the record room.

Chairman  
Camp Court A/Abad


**Certified to be true copy**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Announced:  
18.12.2018

Date of transcription of copy	31-12-18
Number of copies	6
Copying Fee	
Urgent	
Total	
Name of Applicant	
Date of completion of copy	31-12-18
Date of Delivery of copy	31-12-18


27.08.2018

None present for the appellant. Due to summer vacations, the case is adjourned. To come up for the same on 16.10.2018 at camp court Abbottabad.

  
Reader

16.10.2018

Clerk of the counsel for appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar High Court Bench, Abbottabad. Adjourned. To come up for preliminary hearing on 18.12.2018 before S.B at Camp Court Abbottabad.

  
Member  
Camp court, A/Abad

18.12.2018

Nemo for appellant.

It is already 2.30 PM and the case has been called several times, despite, no one is in attendance on behalf of the appellant.

Dismissed for non-prosecution. File be consigned to the record room.



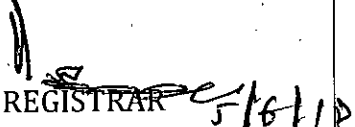


  
Chairman  
Camp Court A/Abad

Announced:  
18.12.2018

Form- A  
FORM OF ORDER SHEET

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

Case No. 778 /2018

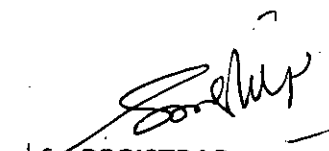
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/06/2018	<p>The appeal of Mr. Ishtiaq Ahmad resubmitted today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;">   REGISTRAR 5/6/18 </p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>29/6/18</u>.</p> <p style="text-align: right;">   CHAIRMAN </p>
29.06.2018		<p>Neither the appellant nor his counsel present though attended the Tribunal early in the morning but when the case in hand was called neither appellant nor his counsel was present, so adjourned for preliminary hearing on 27.08.2018 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;">   Chairman  Camp court, A/Abad </p>

The appeal of Mr. Ishtiaq Ahmad SSTG Govt. Middle School Marri Abbottabad received today i.e. on 21.05.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexure-B of the appeal is illegible which may be replaced by legible/better one.

No. 1067 /S.T,

Dt. 21/05 /2018.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M.Arshad Khan Tanoli Adv. A.Abad.

*Siv, case is resubmitted  
after removing of the objection*



Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No: 33 Adjacent to  
Diyar-e-Abbottabad

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

Service Appeal No. 778 /2018

Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office Sherwan Presently Govt. Middle School Marri Tehsil Havelian District Abbottabad.

...APPELLANT

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

**SERVICE APPEAL**

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*Ishtiaq Ahmed*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2018

*Muhammad Arshad Khan Tanoli*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,**  
**PESHAWAR**

Service Appeal No. 778 /2018

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 745

Dated 21-5-2018

Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office  
Sherwan Presently Govt. Middle School Marri Tehsil Havelian District  
Abbottabad.

**...APPELLANT**

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Abbottabad.
4. District Account Officer District Abbottabad.

**...RESPONDENTS**

**Filed to day**  
*Sand Wajid*  
**Registrar**

Re-submitted to -day  
and filed.

*R...*  
**Registrar**  
*05/6/18*

**SERVICE APPEAL UNDER ARTICLE 4 OF KPK  
SERVICE TRIBUNAL ACT, 1974, FOR  
DECLARATION TO THE EFFECT THAT THE**

APPELLANT GOT APPOINTMENT AS UNTRAINED PTC (PST) ON 28/10/1987 AND REMAINED UNTRAINED TILL 12/03/1993. AS GOVT. OF KPK FINANCE DEPARTMENT REGULATION WING LETTER DATED 20/10/2009, WHEREIN, BENEFITS OF ANNUAL INCREMENTS OF UNTRAINED PERIOD TILL THE COMPLETION OF REQUISITE TRAINING HAS BEEN ALLOWED WITH EFFECT FROM 30/02/2009 WITHOUT ARREAS. BUT RESPONDENT DEPARTMENT DID NOT ALLOW INCREMENTS OF UNTRAINED PERIOD W.E.F 28/12/1987 TO 12/03/1993, WHICH IS DISCRIMINATORY, AGAINST THE LAW AND NOTIFICATION DATED 30/10/2009.

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**PRAYER:** ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO ALLOW ANNUAL INCREMENT OF UNTRAINED PERIOD WITH EFFECT FROM 28/12/1987 TO 12/03/1993 IN THE LIGHT OF FINANCE DEPARTMENT REPUBLICATION WING LETTER NO. FD (PRC)5-2/2002 DATED 30/10/2009 ALONGWITH ARREARS ACCORDING TO THE LETTER. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT MAY



DEEM APPROPRIATE IN THE CIRCUMSTANCES  
OF THE CASE ALSO BE GRANTED.

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**Respectfully Sheweth:-**

The facts forming the background of instant service appeal of the appellant are arrayed as under:-

1. That the appellant got appointment as untrained PTC (PST) vide appointment order dated 27/12/1987. Copy of appointment order of appellant is attached as annexure "A".
2. That the appellant served as untrained teacher w.e.f. 28/12/1987 to 12/03/1993 and thereafter the appellant got appointment as Certified Teacher (CT) on 13/03/1993 and got charge of the post on 13/03/1993. Copy of appointment of the appellant as CT Teacher dated 03/03/1993 is attached as Annexure "B".
3. That the appellant served the department with complete devotion and to the entire satisfaction of the superiors. The entire period of service of the

appellant is unblemished and blotless. But the respondent department did not allow annual increments of untrained period of service w.e.f. 12/03/1987 to 12/03/1993. Copy of service book of the petitioner is attached as Annexure "C".

4. That Govt. of KPK Finance Department Regulation Wing allowed the benefits of annual increments to the untrained teacher w.e.f the date of their appointment as such but without arrears vide letter No. FD (PRC)5-2/2002 dated 30/10/2003. Copy of letter of Finance Department Regulations Wing dated 30/10/2009 is attached as Annexure "D".

5. That the respondent department did not allow the benefits of annual increments of untrained period to the appellant with malafide intentions and the appellant started shuttling in the respondent office for redressal of his grievances but no avail. Ultimately, the appellant filed departmental appeal to respondent No. 2 to do the needful on 08/02/2018 but the respondent did not bother to reply to the appellant. Copy of departmental appeal dated 08/02/2018 is attached as Annexure "E"

Hence, the instant service appeal is filed inter alia on following grounds.

**GROUNDS:-**

- a. That grant of annual increment is bounty of the department but the said increments have been allowed by the grant vide letter dated 30/10/2009 respondent department are duly bound to arrange to allow annual increment of untrained period of PST Service 28/12/1187 to 12/02/1993 and arrears thereof may also be granted to the appellate as per notification of the Govt. dated 30/10/2009.
  
- b. It is very sorrow state of the affairs that Govt. functionaries/institutions are not abiding by the law and rightful dues are not granted to the aggrieved Employees. In this regard, superior courts time and again issue judgments regarding following the law in letter and spirit but, the purpose has not and so far been achieved.

- c. That when law authorizes the appellant to have annual increments for his untrained period of service and if the said benefit is not allowed by the respondent department which amounts to misconduct and they are amenable to disciplinary proceedings.
- d. That respondent department has lead to the place which is utterly unknown to the principle of jurisprudence natural justice and rules in vogue.
- e. That the matter relates to the terms and conditions of the appellant, Therefore the same is maintainable before his Honourable Tribunal under Article 212 of the Constitution.
- f. That the service appeal of the appellant is within the period of limitation.

It is therefore, humbly prayed that on acceptance of the instant service appeal respondents may graciously be directed to allow annual increment of untrained period with of from 28/12/1987 to 12/03/1993 in the light of

Finance Department Regulation Wing letter No. FD (PRC) 05/02/2002 dated 30/10/2009 alongwith arrears according to the letter. Any other relief which this Honourable Court may deem appropriate in the circumstances of the case may also be granted.



...APPELLANT

Through

Dated: \_\_\_\_\_/2018



(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

**VERIFICATION:-**

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

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

Service Appeal No. \_\_\_\_\_/2018

Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office Sherwan Presently Govt. Middle School Marri Tehsil Havelian District Abbottabad.

...APPELLANT

**VERSUS**

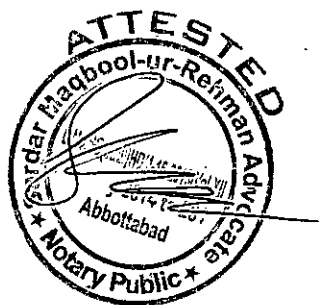
Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office Sherwan Presently Govt. Middle School Marri Tehsil Havelian District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



19/5/2018

**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2018

Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office  
Sherwan Presently Govt. Middle School Marri Tehsil Havelian District  
Abbottabad.

...APPELLANT

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary  
Education, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

**SERVICE APPEAL**

**ADDRESSES OF THE PARTIES**

Ishtiaq Ahmed S/o Said ur Rehman SSTG R/o Village and Post Office  
Sherwan Presently Govt. Middle School Marri Tehsil Havelian District  
Abbottabad.

...APPELLANT

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary &  
Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa,  
Peshawar
3. District Education Officer (Male) Abbottabad.
4. District Account Officer District Abbottabad.

...RESPONDENTS

  
 ...APPELLANT

Dated: \_\_\_\_\_/2018

Through

  
 (Muhammad Arshad Khan Tanoli)  
 Advocate High Court, Abbottabad

Annex A, P-10

APPOINTMENT.

OFFICE OF THE DISTRICT EDUCATION OFFICER  
 ATTED ABBOTTABAD  
 375 / PTC/PT  
 27/12/1987

As approved the District Education Officer (Male) Abbottabad hereby orders the following appointment of the PTC/PT Teachers in the interest of public service against the school vacancies noted against names with effect from the date of taking over the charge in B.S. 7 @ 75 fixed plus usual allowances as admissible under the rules.

S. No.	Name/Father's Name & Address.	Place where appointed	Remarks.
1	Kjaz Ahmed S/O Hussain Baksh R/O Kuthiala C/O Incharge Centre Sherwan.	GMS T. Sherwan	Age 37.5 Vacant
2	Javed Khan S/O Feroz Khan R/O Thora Kalan P.O Sherwan	" T. Thora Kalan	-do-
3	Muhammad Saeed S/O Muhd: Hussain R/O Behakki P.O Kakotri	M. Behakki	Age 37.5 (Danah) -do-
4	Muhammad Irshad S/O Umer Khan R/O Kherpir	GMS T. Kherpir	-do-
5	Fida Muhd: S/O Saraj Muhammad R/O Sherwan Khurd	GMS T. Sherwan	-do-
6	Ishtiaq Ahmed S/O Said ur Rehman R/O Pateel (Sherwan)	GMS T. Pateel	-do-
7	Muhd: Afsar S/O Khalil ur Rehman R/O Pateel (Sherwan)	" T. Pateel	-do-
8	Mehboob Khan S/O Yaqub Khan R/O Kuthiala	" T. Kuthiala	-do-
9	Muhd: Aftab S/O Muhd: Younis R/O Banda Chamiali	GMS T. Banda Chamiali	-do-
10	Abdul Wahab S/O Abdul Sattar R/O Kuthiala	TT GIS Kurli	-do-
11	Saeed ur Rehman S/O Aziz ur Rehman R/O Chhattri	GPS T. Chhattri	-do-

*Attested*  
 Muhammad Arshad Khan Tanoli  
 Advocate High Court  
 Office No. 133, 134, 135  
 Dist. Bahawalpur

CONDITIONS:

- Charge report should be submitted to the District Education Officer, Abbottabad, within 15 days of joining time allowed to him when in transit.
- The appointment is purely temporary and subject to termination at any time without notice and assignment of reasons.
- They are directed to produce Health and Fitness Certificate from the Civil Surgeon Abbottabad.
- In case the candidate failed to take over the charge within 15 days from the date of issue of this order, the appointment will stand automatically cancelled.
- The Candidates should not be handed over the charge if his age exceeds 25 years or below 18 years.
- Educational Qualification Certificates will be checked before handing over the charge.
- The appointment made under all service conditions shown by the Government.

MUHAMMAD ASHRAF  
 SUB-DIVISIONAL EDUCATION OFFICER  
 ABBOTTABAD



Office of the Director of Education  
 Advocate High Court  
 Office No. 33 Adjacent to  
 District Jail, Lahore

*[Handwritten signature]*

... Contd: on P-2...  
 ... Contd: on P-4...

S. NO.	Name/Father's Name/Qualification	Remarks
1	Mr. Muehtag Ahmad CF, GMS, Harat	Abbotabad.
2	Mr. Muhammad Sajid CF, GMS, ILLIL (Kohistan)	Abbotabad.
3	Mr. Javed Iqbal CF, GMS, Pasang	Mansehra.
4	Mr. Luqman Abbasi CF, GMS, Razika	Mansehra.
5	Mr. Muhammad Zubair CF, GMS, Kenner	(Kohistan)
6	Mr. Shamzur-Rehman CF, GMS, Mangocher	(K.D) Mangocher.
7	Mr. Zaid Ali Khan CF, GMS, Deroor	Harat.
8	Mr. Hazrat Yousaf CF, GMS, Pattan	(Kohistan)
9	Mr. Muhammad Rafique CF, GMS, work	agn: SV post at GMS, Phailah, A. I. I. I.
10	Mr. Jamil-ur-Richman, BSc/CF GMS,	Garhi Habib-ullah, Mansehra.
11	Mr. Syed Zahid Ali Shah CF, GMS,	Harat.
12	Mr. Basarat Ali Shah CF, GMS, ILLIL	Harat.
13	Mr. Muhammad Asad CF, GMS, Kottla	Harat.
14	Mr. Muhammad Faz SV, GMS, Ghor	Harat.
15	Mr. Abdul Wadood CF, GMS, Pattan	Harat.
16	Mr. Abdul Razaq BA/CF, GMS, S/O	Harat.
17	Abdur Rashid H. MO. S/O, Moh: Moh: Zai	Harat.
18	N/Sheer, A. I. I. I.	Harat.
19	Sajid Saleem BSc/CF, GMS, S/O Bava	Harat.
20	Khan VILL: & PO, Langra, Bala (Man:)	Harat.
21	Mr. Muhammad Daud BSc/CF, GMS, S/O	Harat.
22	Kala Khan KES Sec: MO. 1 H. MO. 314	Harat.
23	Habib Shah D. H/CF, GMS, S/O, Miri Shan	Harat.
24	Amjad Zia BSc/CF, GMS, H. MO. 57/16	Harat.
25	S/O Wali Muhammad Shamsi ILLIL	Harat.
26	GMS, Ziaurat Meesom -do-	Harat.
27	GMS, Ghari Habib	Harat.
28	GMS, Ghari Habib	Harat.
29	GMS, Ghari Habib	Harat.
30	GMS, Ghari Habib	Harat.
31	GMS, Ghari Habib	Harat.
32	GMS, Ghari Habib	Harat.
33	GMS, Ghari Habib	Harat.
34	GMS, Ghari Habib	Harat.
35	GMS, Ghari Habib	Harat.
36	GMS, Ghari Habib	Harat.
37	GMS, Ghari Habib	Harat.
38	GMS, Ghari Habib	Harat.
39	GMS, Ghari Habib	Harat.
40	GMS, Ghari Habib	Harat.
41	GMS, Ghari Habib	Harat.
42	GMS, Ghari Habib	Harat.
43	GMS, Ghari Habib	Harat.
44	GMS, Ghari Habib	Harat.
45	GMS, Ghari Habib	Harat.
46	GMS, Ghari Habib	Harat.
47	GMS, Ghari Habib	Harat.
48	GMS, Ghari Habib	Harat.
49	GMS, Ghari Habib	Harat.
50	GMS, Ghari Habib	Harat.

The following is a statement of the findings of the committee of the following candidates (Long Quare) and they are ordered against the post as noted against each in the list (1185-72-2265) plus that the committee is responsible under the rules with effect from the date of their taking-over charge on the following terms & conditions in the interest of public service:-

APPOINTMENT/ADMISSION

THE FOLLOWING IS A STATEMENT OF THE FINDINGS OF THE COMMITTEE OF THE FOLLOWING CANDIDATES (LONG QUARE) AND THEY ARE ORDERED AGAINST THE POST AS NOTED AGAINST EACH IN THE LIST (1185-72-2265) PLUS THAT THE COMMITTEE IS RESPONSIBLE UNDER THE RULES WITH EFFECT FROM THE DATE OF THEIR TAKING-OVER CHARGE ON THE FOLLOWING TERMS & CONDITIONS IN THE INTEREST OF PUBLIC SERVICE:-

13/1/93

3/3/93

P-11

Annex-B

OFFICE OF THE DEPUTY DIRECTOR OF EDUCATION (S) HAZARA DIVISION, A. I. I. I.

ANNONA

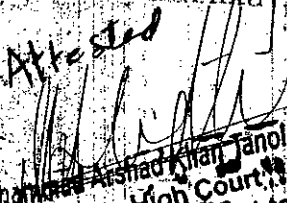
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11-9

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- 40. Mr. Muhammad Asif BA/CT Trd: S/O Mukhtiar-ullah Vill: & PO: Garhi Habibullah GMS, Rasika Vice S.No. 4 (Koh:)
- 41. Mr. Altaf Qadir FA/CT Trd: work: agn: PTC/ at GPS, Kuli Gah Manshra. GMS, Illil Vice S.NO. 12.
- 42. Mr. Shamma-Rez BSc/CT Trd: S/O Iman PO, Serai Saleh C/O Iman Clock Serai Saleh Haripur. GMS, Patten Vice S.NO. 8.
- 43. Mr. Mohammad Nadeem BSc/CT Trd: S/O Mohd Khan Vill: Pothohi PO, Sheran Koh: Bahrec (A'Abad). GMS, Sec (Koh:) Agn: Vacant (Post).
- 44. Haroon Shah zed FA/CT Trd: S/O Shahzada Vill: Shah Inqsood PC, Serai Saleh (H.Pur). GMS, Bagra Agn: Vacant S Post.
- 45. Saif-ur-Rehman BA/CT Trd: S/O Aurangzeb Vill: Bochhah Kalan Abbottabad. GMS, Harigoh Agn: Vacant C Post.
- 46. Mr. Ishtiaq Ahmad BA/CT Trd: work: agn: PTC post at GPS, Pind Kargo Khan (A'Abad). "Ghari Shabi" (Koh:) -do- Manja -do-
- 47. Mr. Mushtaq Ahmad FB&CT Trd: S/O Mir Afzal Khan Vill: & PO, Kelika Via Oghi Manshra. -do- -do-
- 48. Mr. Abdul Waheed FSc/CT Trd: S/O Muhammad Farid Khan Vill: Khatta Dobandi PO, Ghari Habib-ullah Manshra. GMS, Qadar (Koh:) -do-
- 49. Mr. Sahoolat Islam FA/CT Trd: S/O Walayat Khan Vill: Banda Ali Khan Public School (A'Abad). -do- -do-
- 50. Mr. Khalid Mahmood BA/CT Trd: S/O Saeed Ahmad Vill: & Moh: Dohari PC, Balakat (Man:). GMS, Ghozi Abad -do-
- 51. Mr. Tahir Nadeem BA/CT Trd: S/O Abdul Qadeem Vill: & PO, Bandi Attai Khan A'Abad. GHSS, Patten Vice S.NO. 15
- 52. Mr. Shaheer Ahmad FA/CT Trd: S/O Gul Zaman Zaman Vill: Bandi Pahar PC, Hadera Maira A'Abad via G.H. Villah. GMS, S, Harban Agn: Vacant C Post. (Koh:)
- 53. Mr. Khalid Mahmood FA/CT Trd: S/O Faqir Mohd (Late) H.NO. 916-TC nat. Lch: / Sher A'Abad. -do- -do-
- 54. Mr. Mohammad Imru BA/CT Trd: S/O Mohammad Daud Vill: Kandhorhi Dakhli Soha PC, Kaketri (A'Abad). GMS, Shera -do- Koh (Koh:)
- 55. Mr. Gulzar Ahmad BA/CT Trd: S/O Mohammad Ayub Vill: Nomli PO, Maira Kalan via Bagneter A'Abad. GMS, Dassu. -do- (Koh:)
- 56. Mr. Qadir Ahmad BA/CT Trd: S/O Bashir Ahmad C/O H.NO. 1190 Moh: Sheranala Gate Chowki Police H.Pur. GMS, Bartooni -do- (Koh:)
- 57. Mr. Mohammad Hanif BA/CT Trd: work: agn: PLT at GHS, Kathiala A'Abad. GMS, Sumra - Agn: Vacant SW Post. (A'Abad).
- 58. Mr. Tasawar Hussain BA/CT Trd: S/O Fazal-ur-Rehman Vill: Kanthiali-Chun-Kokmong A'Abad. GMS, Chawell -do- (A'Abad)
- 59. Mr. Nawazish Ali Shah BA/CT Trd: work: agn: PTC/GPS, Jagal (H.Pur). GMS, Kalanjir -do-
- 60. Mr. Mohammed Ali FA/CT Trd: S/O Mushtaq Ahmad SV, GHS, Lagan Thokri (Manshra). GMS, Bhogar Mang -do-
- 61. Mr. Abdul Qadoos BA/CT Trd: work: agn: PTC/ at GPS, Borray Battagram/Manshra. GMS, Jozc (Man:) -do-
- 62. Mr. Mohammad Sharif FA/CT Trd: S/O Ghulam Jan Vill: & PO, Karori Bala Manshra. GMS, Bembal (KD) -do-
- 63. Mr. Akhtar Zeb DH/CT Trd: S/O Mohammad Hamayun Vill: & PO, Bajna Manshra. GMS, Pazang (Man:) -do-
- 64. Mr. Shah Nawaz BA/CT Trd: S/O Mohammad Ayub Vill: & PO, Nara A'Abad. GMS, Satora (A'Abad) -do-
- 65. Mr. Sajid Hussain Shah BA/CT Trd: S/O S. Komaz Vill: Kashka PO, Jhangra A'Abad. GMS, Ziarat Bela -do- (H.Pur).

Contd: on P-4

Attested  
  
 Advocate High Court  
 Fee No. 33 Adjacent to  
 Abbottabad

M. Asif  
Director High Court  
33 Adjacent to  
...abad

Attested

ABOTTA BAZAR  
DIRECTOR OF EDUCATION  
(SCHOOLS) HAZARA DIVISION

*[Handwritten signature]*

\* M. ASIF \*

1. Director of Secondary Edu: LBR, Peshawar.  
2. ALL the DEO (M) Secy: In Haz: Dism: (3) ALL the SDOs (M) in Haz: Dism:  
3. ALL the Distt: accounts Officers in Hazara Dism:  
4. ALL the H/Masters, GHS/GMS concerned. (6) ALL the candidates concerne  
5. VDO (E) Local Director (8) Supdt: Local Director (9) O.O. File.  
6. Dealing concerned Local Directorate.

Copy forwarded for information and n/option to the:  
Endst: NO. 4016-4315 /AR-III 229 CP(M) Dated 03/3 /1993.  
H. Z. H. DIVISION ABOTTA BAZAR  
DIRECTOR OF EDUCATION (S)

NOTES: - 1. NO T.M./D./T.G IS ALLOWED. (2) Charge reports should be sent to  
all concerned.  
CONDITIONS: - 1. The appointment is purely on temporary basis and subject  
to termination at any time without notice or assigning any reason.  
2. They should produce their age and health certificate from the MS,  
concerned.  
3. The Head of Institution /office are required to check all original  
educational qualification certificates before handing over charge to  
them.  
4. In case they wish to resign from service they will have to give one  
month's prior notice or forfeit one month pay in lieu of short notice.  
5. The appointment shall stand automatically cancelled if they fail to  
join the post within 15 days of the issue of this order.  
6. The candidates should not be handed-over charge if their age exceed  
30/25 years (CP/SV) respectively or below 18 years.

- 91. Mr. Muhammad Latif Khan M.A./CP Dism: work: GMS, Buzg (Haz):  
S.M: DM Post of GHS, Karapattan.  
-do- Mr. Javid Khan M.A./CP Dism: S/O Muhammad "Qazipur (H. Pur)  
Yousuf Khan Vill: & PO, Dohri Loban Bandi  
Haripur.
- 92. Mr. Saeed M.A./CP Dism: S/O Abdul Mujeeb "Sardardana"  
work: DM Post at Govt: P.T. Mosque  
Sch: Saeed Sahib Garbi, H/Pur.  
-do- Mr. Hafiz B.A./CP Dism: S/O Ahmad GHS, Sec (Koh): And: Vacant SV  
Saeed Vill: & PO, Boket via Balla  
Manshra.

P-13

**OFFICE OF THE DIVIL: DIRECTOR OF EDUCATION (S) HAZARA  
DIVISION, ABBOTTABAD**

\_\_\_\_\_ No.13/AE-III CT(M)

Dated A.Abad the 03/03/1993

**APPOINTMENT/ ADJUSTMENT:-**

The following appointment/ adjustment of the trained CT candidates (Long Course) are hereby ordered against CT/LV post as noted against each in BPS-9 (Rs.1125-72-2265) plus usual allowance as admissible under the rule with effect from the date of their taking over charge on the following terms & conditions in the interest of public service.

S.No.	Name/ Father Name/ Qualification with Address	School where posted/ adjusted	Remarks
1.	Mr. Mushtaq Ahmed CT, GMS Mari Abbottabad	GMS _____ Mansehra	Agn: Vacant CT post
2.	Mr. Muhammad Sajid CT, GMS Illil Kohistan	GMS Labour Court Mansehra	Do
3.	Mr. Javed Iqbal CT, GMS Pazang Mansehra	GHSS Parhima Mansehra	Do
4.	Mr. Luqman Abbasi CT, GMS Razika Kohistan	GHS, Schaki Bala Mansehra	Do
5.	Mr. Muhammad Zubair CT, GMS Kaneer (Amz:) Haripur	GHS, _____ Abbottabad	Do
6.	Mr. Shamsur Rehman CT, GMS _____ (K.D) Mansehra	Bangi _____ Mansehra	Do
7.	Mr. Zahid Ali Khan CT, GMS Teror, Abbottabad	GHS, Hazeera Abbottabad	Do
8.	Mr. Hazarat Yousaf CT, GMS, Pattan, Kohistan		Do
9.	Mr. Muhammad Rafique, CT. Trd: v.ork: agn: Sy post it GHS, Phallah, Abbottabad	GHS, Thakot, Mansehra	Do
10.	Mr. Jamil-ur-Rehman Sc/ CT GHS, Garhi Habibullah Mansehra	GHS, Seri _____	Do
11.	Mr. Syed Zahid Ali Shah CT, GHS, Dartian Haripur	GHS, Dhook Gakaran, Haripur	Do
12.	Mr. Basharat Ali Shah CT, GHS, Illil	GHS, Dhook Gakaran, Haripur	Do
13.	Mr. Muhammad Asad CT, GHS, Kotla	GHSS, Beer, Haripur	Do
14.	Mr. Muhammad Fiaz SV, GHS, Seer, Abbottabad	GMS, Kairs _____	Agn: SV post
15.	Mr. Abdul Wadood CT, GESG, Pattan	GMS, Ghazi, Abbottabad, Kohistan	Agn: Vac: GT Post
16.	Mr. Abdur Razzaq BA/ CT, Trd: S/O Abdur Rashid, H. No. 8/C Ioh: Mohd Zai, N/ Sher Abbottabad	GHS, Bagra, Haripur	Do
17.	Sajid Saleem Bsc/ CT Trd: S/O Bara Khan Vill: &PO, Trangri Bala(Man:)	GHS, Ghari Habibullah (Man:)	Vice S.No. 10
18.	Mr. Muhammad Daud BSc/ GH, Trd: S/O Kala Khan KTS Sec No. 1 H . 314	GHS, Dartian	Vice S.No. 11
19.	Habib Shah D.H/CT, Trd: S/O Amir Shah, Noor Colony Moh: Munsefabad, Haripur	GMS, Bagla (H.Pur)	Agn: Vac: CT Post
20.	Amjad Zia BSc/ CT, Trd: H.No. 57/16 S/O Wali Muhammad Shamle Hill: upper Malikpura Abbottabad.	GHS, Ziarat Masoom	Do

39	Mohammad Asif BA/CT Trd; S/O Mukhtiar Vill: & P/O, Ghari Habibullah	GHS, Rasika, Kohistan	Vice, S.No. 4
40	Mr. Altaf Qadir FA/CT Trd: Work agn: PTC/ at GPS Kuli Gah Mansehra	GHS, Illil	Vice, S.No. 12
41	Mr. Shamma-Rez Bsc/CT Imran PO, Serai Saleh C/O Imran Serai Saleh	GHSC, Pattan,	Vice, S.No. 8
42	Mr. Mohammad Naheem BSc/ CT, Trd: S/O Mohd Khan Vill: Patheel, PO, Sheeraan Moh; Dahree, Abbottabad	GHS, Sec(Keh:)	Agn; Vacant Post
43	Haroon Shah Zad, FA/ CT, Trd: S/O Shahzada Vill: Shah Maqsood, PO, Serai Saleh, Haripur	GHS, Bagra	Agn; Vacant S, Post
44	Saif-ur-Rehman BA/ CT, Trd: S/O Aurangzeb Vill: Bachhah Kalan Abbottabad	GHS, Harizah, Kohistan	Agn: vac: CT, pst
45	Mr. Ishtiaq Ahmed BA/ CT, Trd: work: agn: PTC post at GPS, Pind Kargo Khan, Abbottabad	Ghari Shabi Khel, Kohistan	Do
46	Mr. Mushtaq Ahmed FSc/ CT, Trd: S/O Mir Afzal Khan Vill: &PO, Kelika Via Oghi, Mansehra	Do	Do
47	Mr. Abdul Waheed FSc/ CT, Trd: S/O Muhammad Farid Khan Vill: Khata Dobandi PO, Ghari Habibullah Mansehra	GMS, Cadar, Kohistan	Do
48	Mr. Sahoolat Islam FA/ CT, Trd: S/O Walayat Khan Vill: Banda Ali Khan, Public School, Abbottabad	Do	Do
49	Mr. Khalid Mehmood BA/CT, Trd: S/O Saeed Ahmed Vill: & Moh: Dodhari PO, Balakot, Mansehra	GMS, Ghaziabad	Do
50	Mr. Tahir Nadeem BA/CT Trd: S/o Abdul Qadeem Vill: & PO, Bandi Attai Khan, Abbottabad	GHSS, Pattan	Vice, S.No. 15
51	Mr. Shaheer Ahmed FA/CT, Trd: S/O Gul Zaman Vill: Bandi Pahoo, PO, Hadera Maira, Abbottabad Via G.H	GMS, S. Harban, Kohistan	Agn: Vac: CT post
52	Mr. Khalid Mehmood FA/CT, Trd: S/O, Faqir Mohd: (Late) H.No. 916-TC /Sher Atd.	Do	Do
53	Mr. Mohammad Imran Trd: S/O Mohammad Daud Vill: Kandoorhi Dakhli PO, Kakotri, Abbottabad	GHS, Sherakot Kohistan	Do
54	Mr. Gulzar Ahmed F.Sc/ CT, Trd: S/O Mohammad Ayub Vill: Namli, PO, Maira Kalan Via, Bagnoter Abbottabad	GHS, Dassu, Kohistan	Do
55	Mr. Qadir Ahmed BA/CT, Trd: S/O Bashir Ahmed C/O, H.No. 1190 Moh: Sheranwala Gate Chowki Police Haripur	GMS, Bartooni, Kohistan	Do
56	Mr. Mohammad Hanif BA/CT, Trd: work: agn:PLT at GHS, Kothiala, Abbottabad	GHS, ____, Abbottabad	Agn: Vac: SV post
57	Mr. Tasawar Hussain BA/CT, Trd: S/o Fazal-ur-Rehman vill: Kanthiali-cum-kokmang, Abbottabad	GHS, ____ Abbottabad	Do
58	Mr. Nawazish Ali Shah RA/CT Trd: Works PTC/GPS, Jagal (H.Pur),	GHS, Kalanjir	Do
59	Mr. Muhammad Ali FA/CT Trd: S/o Mushtaq Ahmad SV, GHS, Lissan Thakral (Mansehra)	GMS, Bhogar Mang	Do
60	Mr. Abdul Qadoos BA/CT Trd: Bord: agn: PTC/ at GPS, Borray Battagram/Mansehra	GHS, Jozo (Man:)	Do
61	Mr. Muhammad Sharif FA/CT. Trd: S/o Ghulam Jan V:&PO, Karori Bala Mansehra.	GMS, Bambal(KD)	Do
62	Mr. Akhtar Zeb DH/CT Trd: S/O Mohammad Hamayun Vill: & P.O, Bajna Mansehra.	GMS, Pazang (Man:)	Do
63	Mr. Shah Nawaz BA/CT Trd: S/o Mohamad Ayub Vill: & P.O Nara A'Abad.	GMS, Ziarat Bela (H.Pur)	Do

88.	Abdul Hafeez BA/CT Trd: S/o Ahmad Sain Vill: & P.O, Kokat Via Baffa Mansehra	GHS, Sec(Koh:)	Agn: Vacant SV Post
89.	Mr. Muhammad Latif Khan, FA/CT Trd: Work: agn: DM Post at GHS, Karaplian.	GMS, Brug (Amz:)	Do
90.	Mr. Javaid Khan FA/CT Trd: S/o Muhammad Yousuf Khan Vill: & P.O, Dehri Laban Bandi Haripur.	Qazipur (H.Pur)	Do
91.	Amjid Saced BA/CT Trd: S/o Abdul Majeed Work: agn: PT Post at Govt: Pry: Masque Sch: Serai Saleh Garbi, H/Pur.	Sarhadna(H.Pur)	Do

Notes:- 1. No TA/DA/TG is allowed. (2). Charge report should be sent to all concerned.

**CONDITIONS:-**

1. The appointment is purely on temporary basis and subject to termination at any time without notice or assigning any person.
2. They should produce their age and health certificate from the MS concerned.
3. The Head of Institution/Office are required to check all original educational qualification certificates before handing over charge to them.
4. In case they wish to resign from service they will have to give one month's prior notice or forfeit one month pay in lieu of short notice.
5. The appointment shall stand automatically cancelled if they fail to join the post within 15 days of the issue of this order.
6. The candidates should not be handed over charge if their age exceed 30/25 years (CT/SV) respectively or below 18 years.

( \_\_\_\_\_ SARFRAZ KHAN)  
**DIVIL: DIRECTOR OF EDUCATION(S)  
HAZARA DIVISION ABBOTTABAD**

Endst: No.4016-4315/AE-III A&T CT(M) Dated 03/3/1993.

Copy forwarded for information and n/action in the;

1. Director of Secondary Edu: NWFP, Peshawar.
2. All the DEOs(M) Scey: in Haz: Divn: (3) All the SDEOs (M) in Haz: Divn:
4. All the Distt: Accounts Officers in Hazara Divn:
5. All the H/Masters, GHS/GMS concerned. (6) All the candidates concern.
7. ADEO(E) Local Directorate (8). Supdt: Local Directorate (9) O.O File.
10. Dealing concerned local Directorate.

M. Asif

**FOR/DIVIL: DIRECTOR OF EDUCATION  
(SCHOOLS) HAZARA DIVISION  
ABBOTTABAD**

Annex 'C'

P-14

(For use in Police Department only)

① Passed S.S.C. Examination  
Boise, Peshawar as a  
regular student <sup>High S.C.</sup>  
Sherwan under Roll No. 9158  
Securing Marks 503 grade C.

⑤ Passed Intermediate Ex  
from Peshawar Board  
Regular student H.C. Sher  
under Roll No. 9106 Sec  
marks 525

2.  
3.

*The way*  
ASDEO (M), ATD

*The way*  
ASDEO (M), ATD

Verification Roll No.

*Counter signed*  
dated

received back

*Counter signed*

Sub: Divl. Edu: Officer (M)  
Abbottabad

Sub: Divl. Edu: Officer (M)  
Abbottabad

② Passed B.A. (H) 1991 under Roll No. 39827 obtained 254 marks 2nd division  
Result declared on 16-3-91. Left thumb-impression.

③ Passed C.T. General Examination Under Roll No. 242  
obtained 783 marks. 1st division from Govt. Elementary College  
of Education Sherwan in 1992. Date of Result is 22-11-92.

Qualification

*ASDEO*  
Date

Qualification

Sub: Divl. Edu: Officer (M) Date

English

Passed B.Ed. (A) Under Roll No. 2843  
Obtained 513 Marks 2nd Division  
from Pesh. University of Peshawar year 1996

First Arts

Pledership Examination

G.H.S. Jirai  
Distt: Abbottabad  
Training School Final examination

Finger print

*L. S. G.*

Other qualifications -

Drill instructing

**PRINCIPAL**  
Govt. High School,  
Sherwan, Abbottabad

Court duties

Reserve duties

Attested  
*Muhammad Arshad Khan, Jirai*  
Advocate High Court  
Office No 33 Adjacent to  
Distt 3ar Abbottabad

④ Date of Passed Intermediate  
Exams; from BISE PESHAWAR  
as a regular candidate H.C.  
Sherwan under Roll No. 9106

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

obtaining 525 marks

Result declared on 5.12.1987.

*L. S. G.*  
Govt. High School



11-9 ZONNA

11-9 ZONNA

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.

1. Name *Ishfaq Ahmad*

2. Race *Muslim (Tanoli)*

3. Residence *Pathel Sherwan*

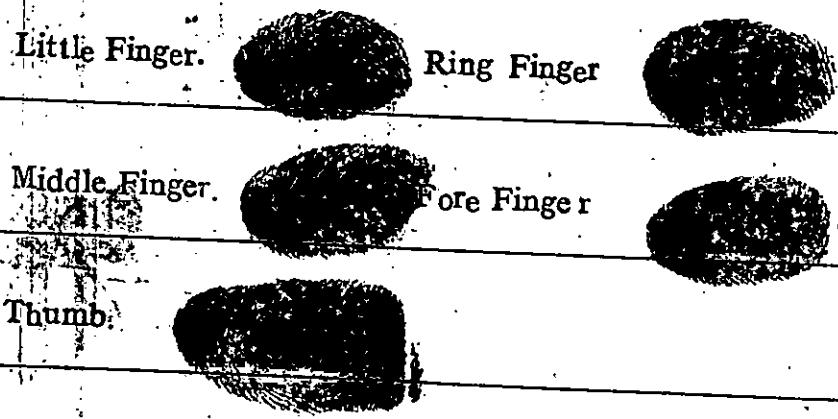
4. Father's name and residence *Said Mr. Rahman*

5. Date of birth by Christian era as nearly as can be ascertained *(20th March N.H. Sixty Nine)*  
*20-3-1969*

6. Exact height by measurement *5-6*

7. Personal marks for identification ...  
*cut sign on forehead*

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



Attested  
*[Signature]*  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad

9. Signature of Government servant.  
*[Signature]*

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

*[Signature]*  
Sub: Div. Edu. Officer (M)  
Abbottabad

Attested  
 Muhammad Arshad Khan Tanoli  
 Advocate High Court  
 Office No 33 Adjacent to  
 ... ..

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 P y in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
P.T.C. / ...			B.P.S. 7.				
P.P. Laceran	officiating		750/-	P.M. fixed		28 <sup>12</sup> / <sub>87</sub> 1955	
P.P. Kalas Khailas	do		750/-	P.M. fixed		7 <sup>5</sup> / <sub>88</sub>	
P.P. Danah (Dora)	do		750/-	P.M. fixed		10 <sup>8</sup> / <sub>87</sub>	
P.P. Nasirpur	do		750/-			20 <sup>5</sup> / <sub>90</sub>	
P.P. ...	do		750/-			13 <sup>6</sup> / <sub>90</sub>	
P.P. Danah	do		750/-			16 <sup>9</sup> / <sub>92</sub>	
			Entire given w.t. from 31 <sup>5</sup> / <sub>91</sub>				
Grade P.P. No 7			1095	1215 P.M. fixed		1 <sup>6</sup> / <sub>91</sub>	
do			1095			16 <sup>9</sup> / <sub>92</sub>	
P.P. Danah	do		1095			5 <sup>10</sup> / <sub>92</sub>	
P.P. P.K. Khan	do		1095			20 <sup>11</sup> / <sub>92</sub>	
do	do		1095			1 <sup>11</sup> / <sub>92</sub>	
do	do		1185			3 <sup>2</sup> / <sub>92</sub>	

Attested

P-17

Arrear bill for 9/92 submitted in 11/92

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).	Signature of the head of the office or other attesting officer	Advocate High Court Office No 33 Adjacent to Abbottabad Nature and duration of leave taken Allocation of period of leave or average pay upto four months for which leave salary is debitable to another 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 reward or praise of the Government Servant.
SDEO (M) Abbottabad	6 5 / 89	Transfer	SDEO (M) Abbottabad			Appointed again. P.E. Post vide SDE O.O. No-375 Dated 27
SDEO (M) Abbottabad	9 8 / 89	Transfer	SDEO (M) Abbottabad			Services verified from 7.8.71 to 30.11.88 from the Acq. RO and other office records.
SDEO (M) Abbottabad	19 5 / 90	Transfer	SDEO (M) Abbottabad			
SDEO (M) Abbottabad	12 6 / 90	Transfer	SDEO (M) Abbottabad			
SDEO (M) Abbottabad	31 8 / 91	Selected for promotion to Long Course	SDEO (M) Abbottabad			Services verified from 1-12-81 to 30-11-91 from the Acq. RO and other office records.
SDEO (M) Abbottabad	15 9 / 92	Readjusted after study leave	SDEO (M) Abbottabad			
SDEO (M) Abbottabad	31 5 / 91	Grade Revised	SDEO (M) Abbottabad			Granted study leave 00-0-1-9-91 to 31-8-1992 under the order no. 5093/AF-2/1 SB Dated 2-11-91 Office of the State Secondary Education Officer
SDEO (M) Abbottabad	15 9 / 92	Readjusted after study leave	SDEO (M) Abbottabad			Sub Divisional Officer (M) Abbottabad
SDEO (M) Abbottabad	4 10 / 92	Transfer	SDEO (M) Abbottabad			services Verified from 1-12-81 to 30-11-91 from The Acq. & Other Office records.
SDEO (M) Abbottabad	19 11 / 92	based on C.T. Exn.	SDEO (M) Abbottabad			
SDEO (M) Abbottabad	30 11 / 92	Inc.	SDEO (M) Abbottabad			
SDEO (M) Abbottabad	9 3 / 93	Transfer	SDEO (M) Abbottabad			On return from study leave readjusted/pled at S.P. Denah vide O.O. No. 75/AF-11/2 No. 2-B/10 dated 15.9.92 by the SDEO (M) Abbottabad
SDEO (M) Abbottabad	13 3 / 93	Carried over from 12/92	SDEO (M) Abbottabad			Took over on 16/9/92

Dy: Distt. T... Secondary

Conceded... August...

S.D.E.O. (M) A.F. B.C.

Services verified from 1-12-81 to 30-11-91 from the Acq. RO and other office records.

S.D.E.O. (M) A.F. B.C.

Granted study leave 00-0-1-9-91 to 31-8-1992 under the order no. 5093/AF-2/1 SB Dated 2-11-91 Office of the State Secondary Education Officer

Sub Divisional Officer (M) Abbottabad

services Verified from 1-12-81 to 30-11-91 from The Acq. & Other Office records.

S.D.E.O. (M)

On return from study leave readjusted/pled at S.P. Denah vide O.O. No. 75/AF-11/2 No. 2-B/10 dated 15.9.92 by the SDEO (M) Abbottabad

Took over on 16/9/92

S.D.E.O. (M)

*Attested*

P-18

6

*Maharajprasad Khan Tanoli  
Associate High Court  
Office No 33 Adjacent to  
High Court*

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 'Pay'	Date of appointment	Signature Government servant
	BPS 142	1530	219	3515	Being BPS Jones	
<i>Manager</i>	<i>Res/off</i>	1530/-	-	-	13 <sup>31</sup> / <sub>93</sub>	<i>Sharma</i>
"	"	1530/-	-	-	1 <sup>6</sup> / <sub>93</sub>	<i>Sharma</i>
"	"	Rs. 1649/-	-	-	1-12-93	<i>Sharma</i>
		(B.P.S. 14-2065-161-4480)				<i>Sharma</i>
"	<i>-do-</i>	-	Rs. 2226/-	<i>PM</i>	1-6-94	<i>Sharma</i>
"	<i>-do-</i>	-	Rs. 2387/-	<i>PM</i>	1-12-94	<i>Sharma</i>
<i>Chs. Municipal Aid (Ct Post)</i>	<i>-do-</i>	-	Rs. 2387/-	<i>PM</i>	1-3-95	<i>Sharma</i>
<i>CHS JARRAL CT. POST</i>	<i>-do-</i>	-	Rs. 2387/-	<i>PM</i>	17 <sup>5</sup> / <sub>95</sub>	<i>Sharma</i>
<i>-do-</i>	<i>-do-</i>	-	Rs. 2548/-	<i>PM</i>	1 <sup>12</sup> / <sub>95</sub>	<i>Sharma</i>
<i>-do-</i>	<i>-do-</i>	-	Rs. 2709/-	<i>PM</i>	1 <sup>12</sup> / <sub>96</sub>	<i>Sharma</i>
<i>-do-</i>	<i>-do-</i>	-	Rs. 2870/-	<i>PM</i>	1 <sup>12</sup> / <sub>97</sub>	<i>Sharma</i>
<i>-do-</i>	<i>-do-</i>	-	Rs. 3031/-	<i>PM</i>	1 <sup>12</sup> / <sub>98</sub>	<i>Sharma</i>
<i>Chs W-S Sherwan ATO</i>	<i>-do-</i>	-	Rs. 3031/-	<i>PM</i>	1 <sup>10</sup> / <sub>99</sub>	<i>Sharma</i>
<i>-do-</i>	<i>-do-</i>	-	Rs. 3192/-	<i>PM</i>	1 <sup>12</sup> / <sub>99</sub>	<i>Sharma</i>

Attested

5.7 8-19

9	10	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 promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	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	Leave:	
				Allocation of period pay upto four months for which leave salary is debitable to another Government	Period Government to which debitable	
S.D.E.O (M) Abbottabad	31/5 93/4 30/93	Transfer			Services verified by G-93 from Acq: Recs & office records.	
Headmaster D.E.O. (M) Abbottabad	30/11 93	A/Onc	D.E.O. (M) Abbottabad		Cag: SDE	
Headmaster D.E.O. (M) Abbottabad	31/5 94	Special	By Dist. Edu. Officer (Secy), Abbottabad		Service Verified from Acq: 1 & other office records from 12.2.22 to 31-5	
Dist. Dir: Edu. Officer (Secy), Abbottabad	30/11 94	All India	Dist. Dir: Edu. Officer (Secy), Abbottabad		Appointed as CT vide Dt (S) Hajaraabad under EO 13/AE dated 3-12-93	
Dist. Dir: Edu. Officer (Secy), Abbottabad	28/95	Transfer to GHS	Dist. Dir: Edu. Officer (Secy), Abbottabad		13/AE dated 3-12-93	
Headmaster G.H.S. Jarral Distt: Abbottabad	30/11 95	inc	Headmaster G.H.S. Jarral Distt: Abbottabad		13/AE dated 3-12-93	
Headmaster G.H.S. Jarral Distt: Abbottabad	30/11 96	inc	Headmaster G.H.S. Jarral Distt: Abbottabad		13/AE dated 3-12-93	
Headmaster G.H.S. Jarral Distt: Abbottabad	30/11 97	inc	Headmaster G.H.S. Jarral Distt: Abbottabad		13/AE dated 3-12-93	
Headmaster G.H.S. Jarral Distt: Abbottabad	30/11 98	inc	Headmaster G.H.S. Jarral Distt: Abbottabad		13/AE dated 3-12-93	
Headmaster G.H.S. Jarral Distt: Abbottabad	30/9 99	Transfered to Sherwan	Headmaster G.H.S. Jarral Distt: A. Abad		Services verified from 30/9/93 from Acq: to other office records.	
Principal G.H.S. Sherwan Abbottabad	10/99	Took over charge	Principal G.H.S. Sherwan Abbottabad		Services verified from 10-2-95 from other office records.	
Principal G.H.S. Sherwan Abbottabad	30/11 99	A/Onc	Principal G.H.S. Sherwan Abbottabad		Services verified from 10-2-95 from other office records.	

Attested

P.20

Muhammad Arshad Khan Tanzeem  
Advocate High Court  
Office No. 339 Adjacent to  
7th Floor Abbottabad

2	3	4	5	6	7	8	
	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.	P. y in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant

GHS SHERWAN  
CT ATD

Per/off

BPS - 14 (2065-161-4480)

RS. 3353/PM

12/2000

Jshiaq

Revised Pay scale for 2001.

BPS-14 (3100-240-10300)

ET

G. H. S. Sherwan  
Abbottabad.

Rs 5260/2 P.M.

12/2001

Office of The Accountant General,  
N.W.F.P. Peshawar  
Pay fixed in the revised basic pay scales 1991  
of RS 1085-624-985 (B. 7)  
a. Rs 1085/2 P.M.W.F.P. 1-1-1991  
with next incr. next on 1-12-1991

Office of The Accountant General,  
N.W.F.P. Peshawar.  
Pay fixed in the revised basic pay scales 1991  
of RS 2065-161-4480 (B. 14)  
a. Rs 2260/2 P.M.W.F.P. 1-1-1991  
with next incr. next on 1-12-1991

Accounts Officer  
Pay Fixation Party N.W.F.P., Peshawar

Accounts Officer  
Pay Fixation Party N.W.F.P. Peshawar.

Note  
The following opp made  
may be recommended

Office of the Accountant General  
N.W.F.P. Peshawar.  
Pay Fixed in the revised basic pay scales 2001  
of Rs 3100-240-10300 (B. 14)  
at Rs 5260/2 P.M.W.F.P.  
with next increment on

1207/18 2060  
1807/3 800  
13 days 80

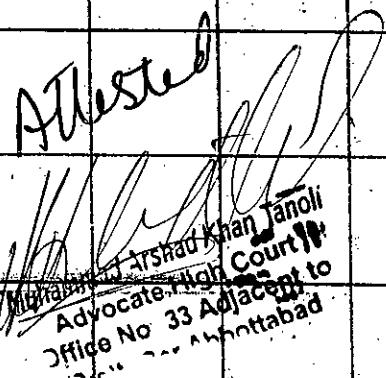
Point - 2780/1

Accounts Officer  
Pay Fixation Party N.W.F.P. Peshawar.

Result declaration on  
5/1/01  
in the 5/1/01  
for P.S. 14 on  
11/1/01  
2) Form of Sanction  
received

Accounts Officer


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 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 reward 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 debitabale to another Government		
				Period	Government to which debitabale		
Principal Govt. High School Sherwan Abbottabad	30/11/2000 A/Incr. 1-8-92	A/Incr. 1-8-92	Principal Govt. High School Sherwan Abbottabad			Study leave extended by 1 1/2 to 15 1/2 = 15 days vide DED (M) Poy. M. Ahmed Endst NO 2691/AE-I (3) dated M. Ahmed Th. 1-12-92	
Principal Govt. High School Sherwan Abbottabad	30/11/2001 2m	A/Incr. 1-8-92	Principal Govt. High School Sherwan Abbottabad			7/1 SD/EO 4/2	
Principal Govt. High School Sherwan Abbottabad	30/11/2002 A/Incr.	A/Incr.	Principal Govt. High School Sherwan Abbottabad		16-5-95 30-4-95	from 1-3-95 from the and other	
Principal Govt. High School Kathia Abbottabad					A/Incr. 1-8-95 PRINCIPAL Govt. High School Kathia Abbottabad	Service verified up to 30/11/95 from the Acq and other records kept	
Principal Govt. High School Kathia Abbottabad					A/Incr. 1-8-95 6.6.96	D. M. Ahmad's letter * Also up to 16/12/92 to July to 8-28 25/12/96	
Principal Govt. High School Kathia Abbottabad					A/Incr. 1-8-95 18/6/94	D. M. Ahmad's letter up to 31-3-93 to 31-3-93 ending to 12/10/92/26	

Attested  
  
 Advocate Arshad Khan Janoli  
 Advocate High Court  
 Office No 33 Adjacent to  
 Sherwan Abbottabad

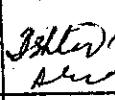
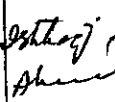
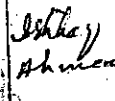
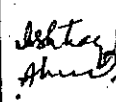
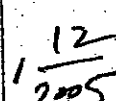
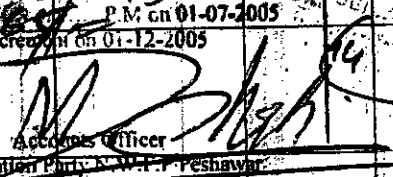
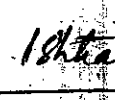

Service Verified from 1-3-95 to 30-11-95  
 from the acquittance Roll & other records  
 Head of the School  
 Principal  
 Govt. High School  
 Kathia Abbottabad

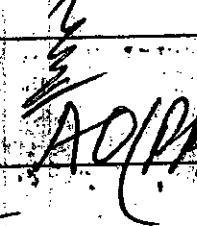


Attested

  
 Advocate High Court  
 Office No 33 Adjacent to  
 Distt Bar Abbottabad

P. 22

2	3	4	5	6	7	8
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 "Pay"	Date of appointment	Signature of Government servant
2001 - B.P.S - 14 (3100 - 240 - 10300) ✓						
CT G.H.S. Sherwan	Perf/Offr	Rs. 5500/2 p.m.			12-2002	
- do -		Rs. 5740/2 p.m.			12-2003	
- do -		Rs. 5980/2 p.m.			12-2004	
New Pay Fixation / pay scale change w.e.f. 1-7-2005 - B.P.S - 14 (3565 - 275 - 11815)						
CT G.H.S. Sherwan	Perms	Rs. 6865/2 p.m.			7-2005	
- do -	Perms	Rs. 7140/2 p.m.			12-2005	
<div data-bbox="568 1411 1039 1789" data-label="Complex-Block"> <p>(2005)                      Office of the Accountant General                      N.W.F.P Peshawar                      Pay Fixed in the revised basic pay scale 2005                      of Rs. 3365 - 275 - 11815                      at Rs. 6865/- P.M. on 01-07-2005                      with next increment on 01-12-2005</p>                       Accounts Officer                      Pay Fixation Party, N.W.F.P. Peshawar                 </div>						
CT G.H.S. Sherwan	Perms/OH	Rs 7415/-			12-2008	
B.P.S - 2007 (4100 - 315 - 13560) w.e.f. 1/7/2007						
CT G.H.S. Sherwan	Perms/OH	Rs. 8510/-			7-2007	

Rs = 6865/2  
  
 AO (P.P.P)

P-23  
S 94  
15/10  
Prj action = 10/9/95

10	11	12	13		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 period of leave on average pay upto four months for which leave salary is debitable to another Government		
		Leave				
		Period	Government to which debitable			
Principal G.H.S. Sherwan Abbottabad.	30/11/2002	Principal G.H.S. Sherwan Abbottabad.			Service Verified from 1/12/96 to 30/11/97 from the acquaintance Roll & other record of the School. Headmaster G.H.S. Jarral Distt: Abbottabad	
Principal G.H.S. Sherwan Abbottabad.	30/11/2003	Principal G.H.S. Sherwan Abbottabad.			Service Verified from 1/12/97 to 31/8/99 from the acquaintance Roll & other record of the School. Headmaster G.H.S. Jarral Distt: Abbottabad	
Principal G.H.S. Sherwan Abbottabad.	30/11/2004	Principal G.H.S. Sherwan Abbottabad.			Service Verified from 1/9/99 to 30/9/99 from the acquaintance Roll & other record of the School. Headmaster G.H.S. Jarral Distt: A. Abad	
Principal G.H.S. Sherwan Abbottabad.	1/7/2005 Pay scale Revised 1/2005	Principal G.H.S. Sherwan Abbottabad.			Service Verified from 1/9/99 to 30/9/99 from the acquaintance Roll & other record of the School. Headmaster G.H.S. Jarral Distt: A. Abad	
Principal G.H.S. Sherwan Abbottabad.	30/11/06 30/11/2005 A/S C	Principal G.H.S. Sherwan Abbottabad.			Service Verified from 1/10/99 to 30/11/99 from the Acq. Rools and other office records. Principal G.H.S. Sherwan ATD	
		<p>Attested</p> <p>Muhammad Arshad Khan Janoli Advocate High Court II Office No: 33 Adjacent to Distt Bar Abbottabad</p>			Service Verified from 01-12-99 to 31-7-2001 from the Acq. Rools and other office records. Principal G.H.S. Sherwan ATD	
Principal G.H.S. Sherwan Abbottabad.	30/6/2007 Scale Revised	Principal Govt. High School Sherwan Abbottabad			Service Verified from 1-8-2001 to 28-6-2002 from the Acq. Rools and other office records. Principal G.H.S. Sherwan ATD	
Principal G.H.S. Sherwan Abbottabad.	30/11/2007 A/Inc	Principal Govt. High School Sherwan Abbottabad			Granted Sanction of BPS-14/Graded Pay w.e.f. 13-03-1993 vide E.D.O (with Edits) Enrol No. 3868-80/EB-II-4-P dated A/Abad 25/9/2002 Principal Govt. High School Sherwan Abbottabad	

8-53



THE UNIVERSITY OF  
MICHIGAN LIBRARY  
SERIALS ACQUISITION  
300 N ZEEB RD  
ANN ARBOR MI 48106-1500

Attested

S. J  
P-24

1	2	3	4	5	6	7	8
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.	P. y in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
CT GMS, Sherwan	Perm / O/A		Rs. 8825/-			12/2007	Jethay
		BPS-15 (Rs. 4350-350-14850)					
CT GMS, Sherwan / (A/T)	Do		Rs. 8900/-			2/2/07	Jethay
		BPS-2008 up 1/1/2008, BPS-15 (5220-420-17820)					
Do	Do		Rs. 10680/-			1/7/08	Jethay
Do	Do		Rs. 11100/-			12/08	Jethay
Do	Do		Rs. 11520/-			12/09	Jethay
<p>2007 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES OF RS. 13,200 to 35,200 AT RS. 8510 P.M.W.E.F. 1-07-2007 With Next Increment on 1-12-2007</p> <p>ACCOUNTS Officer Pay Fixation Party N.W.F.P. Peshawar</p>							
Do	Do		Rs. 11940/-			12/10	Jethay
CT GMS, Sherwan / (A/T)	Do		Rs. 19700/-			7/2011	Jethay
		BPS-15 (8500-700-28500)					
		19700/15					

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13

Attended

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 Allocation of period of leave on average pay basis for the month for which leave salary is debitable to Government. Nature and duration of leave taken Period Government to which debitable	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 Servant.
Principal Govt. High School Sherwan Abbottabad	2/14/07	Award of BPS-15 w.e.f 2/14/07	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-7-2002 to 30-11-2004 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/6/08	Scale Revised	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2004 to 30-11-2005 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/11/07	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/11/07	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD
Principal Govt. High School Sherwan Abbottabad	30/10/08	Awarded BPS-15 due to graduation w.e.f 10-10-2007 vide govt. office Peshawar No. H-24(13)/RBPS 2006-07 Prov. Central Correspondance File/721. Date: 31-01-2008	Principal Govt. High School Sherwan Abbottabad	Principal Govt. High School Sherwan Abbottabad	Service Verified from 1-12-2005 to 30-11-2007 from the Acq. Books and other office records.	Principal G.H.S Sherwan ATD

OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P. PESHAWAR  
PAY FIXED IN THE REVISED BASIC  
PAY SCALES 1

OF RS 5220-420-17820 (25)  
AT RS 10680/- N.W.F.P. 1-07-2008  
With Next Increment on 1-12-2008

Accounts Officer  
Pay Fixation Party N.W.F.P. Peshawar

Basic Pay Scales 2011  
Office of The Accountant General  
Khyber Pakhtun Khwa  
Pay Fixed in R.B.P.S. 2011

OF RS 8500-2000-28500 (15)  
AT RS 19700/- N.W.F.P. 1-07-2011  
With Next Increment on 1-12-2011  
Accounts Officer  
Pakhtun Khawa

S-201  
11/08/08  
Pay allowed in BPS-15  
w.e.f 1-8-08 @ 2,10680/- along with  
diff w.e.f 1-10-07 to 31-12-08 @ 2,1196/-

Service Verified from 1-12-08 to 30-11-10 from the Acq. Books and other office records.  
Principal  
G.H.S Sherwan ATD

Attested  
 Muhammad Arshad  
 Advocate  
 Case No 33 of 2011

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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 emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
CT GMS Shauqat / AFD			Rs. 20400/-			12/2011	Jshfaq
- Do -			Rs. 21100/-			12/2012	Jshfaq
SCT. GMS Shauqat / AFD. Per/off.		BPS-16 (10000-800-34000) One premature increment	Rs. 22000/- 212000/-			21/2/2013	Jshfaq
CT GMS Shauqat / AFD. Per/off		BPS-15 (4850-350-14850)	Rs. 9250/-			2/12/07	Jshfaq
Do -	Do -	BPS-15 (5220-420-17820)	Rs. 11100/-			1/7/08	Jshfaq
Do -	Do -		Rs. 11520/-			1/12/08	Jshfaq
Do -	Do -		Rs. 11840/-			1/12/09	Jshfaq
Do -	Do -		Rs. 12360/-			1/12/10	Jshfaq
Do -	Do -	BPS-15 (8500-700-28500)	Rs. 20400/-			1/7/11	Jshfaq
Do -	Do -		Rs. 21100/-			1/12/11	Jshfaq

2 Annexes

P-27

9	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 promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave 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	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.
<i>[Signature]</i> Principal Govt. High School Sherwan Abbottabad	30/11/11 A/mc.	<i>[Signature]</i> Govt. High School Sherwan Abbottabad	Leave	Service Verified from 11/11/10 to 30/11/11 and other offices	From the Acc. Books, G.H.S. Sherwan A.T.C.		
<i>[Signature]</i> Principal Govt. High School Sherwan, Abbottabad	2013 Promoted to SET Post in BPS-16	<i>[Signature]</i> Principal Govt. High School Sherwan Abbottabad	Sanction of GPF, AA amounting to Rs. 2500. Sanctioned under EDU Education Act 1922 No. 7252 dt. 13/4/2011				
<i>[Signature]</i> Principal Govt. High School Sherwan Abbottabad	Revised Entries	<i>[Signature]</i> Govt. High School Sherwan Abbottabad		<i>[Signature]</i> Principal Govt. High School Sherwan Abbottabad			
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/6/08 Seate Revised	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	TWR 1022 19/4/12 Drawn Rs = 25000/- @ 6945/P.	vide Sr NO 59 dt: 18/4/12 as GPF advance			
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/11/08 A/mc.	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad					
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/11/09 A/mc.	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad					
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/11/10 A/mc.	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	Service verified from 1/1/2011 to 30/11/2012 from the Acc. rolls & other office record.				
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/6/11 Seate Revised	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad					
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/11/11 A/mc.	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	Promoted to SET Post vide Director Elementary & Secondary Education (KPK) dt NO, 3219-85/F.NO 2/ Promotio of BPS-16 dated 21-2-2012				
<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad	30/11/12 A/mc.	<i>[Signature]</i> DDO Govt. High School Sherwan Abbottabad		<i>[Signature]</i> Principal Govt. High School Sherwan Abbottabad			

Attes

Rs 16

P-28

1	2	3	4	5	6	7	8
Name of post	Whether substan- tive or officiating and whether permanent or temporary	if officiating, state (i) substantive appointment, or (ii) whether services counts for pension under Art. 371 C. S. R.	P y in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
LT GMS, Shawan / MTH	P / Off		Rs. 21800/-			1 <sup>12</sup> / <sub>12</sub>	Mthaq
SCT GMS Shawan / MTH		BDS - (10000 - 800 - 34000)	Rs. 22800/-		22000 + 800 (one premature increment)	21 <sup>02</sup> / <sub>2013</sub>	Mthaq

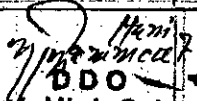



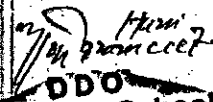
Attested

*(Signature)*  
 Muhammad Arshad Khan Jaroli  
 Advocate High Court  
 Office No. 33 Adjacent to  
 District Court



85-9

1-29

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 promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Government to which debitable Period	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		
 DDO Govt. High School Sherwan Abbottabad	20-12-13	Promoted to BPS-16 SGT Post	 DDO Govt. High School Sherwan Abbottabad		Service verified from 11/2/2012 TO 20-2-2012 from the records & other office records.	
 DDO Govt. High School Sherwan Abbottabad					 Principal DDO Govt. High School Sherwan Abbottabad	
	Attached	Muhammad Arshad Khan Tanoli Director High Court 11/11/13 Acc'd to		Old premature increment due to UP Gradation from BPS-14 to BPS-15 vide Govt. of KPK Finance Department No. (FD(SO-SR-F) 2-123 / 2011 Dated Dushanbe the 30/5/2014.	 DDO Govt. High School Sherwan Abbottabad	5578 12/19/14 Drawn arrear of Pay + Allowance w.e.f. 1-10-07 to 16-7-30-14 due to allowed B.P.S. 14-15-15 amounting to Rs. 140279

Handwritten initials and numbers at the bottom right.

Annex D<sub>1</sub>

P-36



GOVERNMENT OF N.W.F.P  
FINANCE DEPARTMENT  
(REGULATION WING)

NO. FD (PRC) 5-2 /2002  
Dated Peshawar the: 30-10-2009

To: The Secretary to Govt. of NWFP,  
Elementary & Secondary Education Department,  
Peshawar.

Subject: GRANT OF ANNUAL INCREMENT / RUNNING PAY TO  
UNTRAINED TEACHERS IN THE LIGHT OF SUPREME  
COURT JUDGMENT.

Dear Sir,

I am directed to refer to this Department letter No.FD (PRC) 5-2/2002,  
dated 30-03-2009 on the subject noted above and to say that certain quarters have  
raised some queries about the subject matter which are clarified as under:-

- i. All those untrained teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring / completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.
- ii. The above benefit would also be admissible to all those retired teachers who fulfil the above conditions.
- iii. The above benefit would not be admissible to those who themselves resigned or were removed / terminated from service.

2. This Department letter of even number dated 30-03-2009 shall be deemed to have been modified to the above extent.

Yours Faithfully,

(SHAUKAT ULLAH)  
SECTION OFFICER (SR-1)

Encls: of even No. & date.

Copy for information and necessary action:-

1. Accountant General, NWFP.
2. All District Coordination Officers, NWFP.
3. All District / Agency Accounts Officers, NWFP / FATA.

Qazi Mahomedul Rasool  
PRESIDENT  
Teachers Association  
Hazara Division

SECTION OFFICER (SR-1)

Attested  
Muhammad Arshad Khan Tanot  
Advocate High Court  
Office No. 33 Adjacent to  
Distt. Court Abbottabad

4400 E

P-32

To  
The Director  
E & S.E  
Peshawer

Subject :- Application for the increment of untrain period

Dear sir,

Respectively stated that I have been serving in education Department since 28-12-1987 .

As I have served as P.T.C from 28-12-1987 to 12-03-1993 without any training . On the other hand I promoted to C.T on 13-03-1993.

Respected Sir,

My first Six years of service remain untrain. According to the letter from finance dept on 2009 that all the teacher who have an untrain period will be given in increments of the prescribed period.

Sir

All the teacher have got their increments .But I remain avail to the same increment .Therefore I requested to my honourable sir please issue me in order to avails the prescribed increments.

I shall be thank full to you for that.

YA Tal.  
08/02/2018  
Your Sincerely

Ishtiaq ahmed S/o Said ur Rehman

Mobil No 03469524456

Village & P.o Sherwan Tehsil & Disst Abbottabad

Attest

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

# وکالت نامہ

کورٹ فیس

SERVICE TRIBUNAL PESHAWAR.

بعدالت

Govt of KPK etc. نام Ishtiyaj Ahmeel

عنوان:

منجانب:

نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام

محمد ارشد بھٹائی کے نام پر وکیل کے نام پر  
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت ناش بیضہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: Abbottabad.

21-5-2018.

بمقام:

Accepted

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD.**

**Appeal No. 778/2018**

Ishtiaq Ahmed.....Appellant

**VERSUS**

Govt of Khyber Pakhtunkhwa & Others .....Respondents

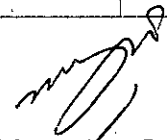
**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS**

**SERVICE APPEAL**

**INDEX**

<b>Sr.No</b>	<b>Description</b>	<b>Page Nos</b>	<b>Annexures</b>
1	Comments alongwith Affidavit	01 to 04	
2	Copy of Notification NO. FD (FRC) 5-2/2002 dated 30-10-2009	05	"A"

Dated: 31/01/2020

  
District Education Officer (M)  
Abbottabad  
(Respondent No. 03)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD.**

**Appeal No. 778/2018**

Ishtiaq Ahmed.....Appellant

**VERSUS**

Govt of Khyber Pakhtunkhwa & Others .....Respondents

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS**

**Respectfully Sheweth:-**

Parawise Comments on behalf of respondents are submitted as under:-

**PRELIMINARY OBJECTIONS:-**

1. That the appellant has no cause of action to file the instant appeal.
2. That the appellant has no locus standi.
3. That the instant appeal is not maintainable in its present form as there is no final order hence, instant appeal is liable to be dismissed without any further proceeding.
4. That no departmental appeal has been filed by the appellant as there is no final order hence, appeal is liable to be dismissed.
5. That the appellant did not come to this Honorable Tribunal with clean hands.
6. That the instant appeal is hopelessly time barred.
7. That the instant appeal is against the service laws hence, liable to be dismissed.
8. That the appellant concealed and distorted the material facts from this Honorable Tribunal.
9. That the present appeal has been filed just to pressurize and blackmail the respondents.

**FACTUAL OBJECTIONS:-**

1. That Para No. 1, of the instant service appeal is relates to the service record of the appellant.
2. That Para No. 2, of the instant service appeal is relates to record.

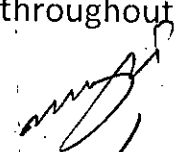
3. That Para No. 3, of the instant appeal as composed is incorrect hence, denied.
4. That the Para No. 4, of the instant service appeal is correct as for as the case of appellatant regarding untrained period of service does not fall within the ambit of Notification dated 30-10-2009 as the post of appellatant as PTC was not regularized as he did not acquire the requisite training and subsequently he was appointed against the post of CT on 13-03-1993 hence, appellatant is not eligible for annual increment. (Copy of Notification dated 30-10-2009 is annexed herewith as Annexure "A").
5. That Para No.5, of the instant appeal as composed is incorrect hence, denied as there is no final order passed by the respondents hence, instant service appeal is not maintainable in its present form. Furthermore, annexure "E" is just an application and same cannot be treated as a departmental appeal.

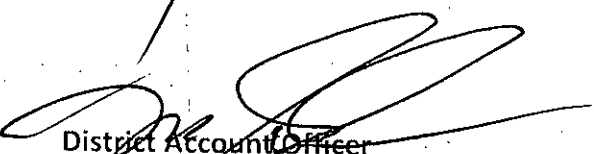
**GROUNDS:-**

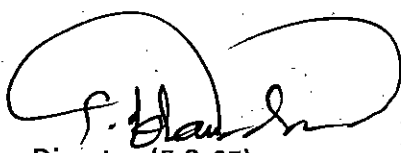
- a. That ground a, of the instant service appeal as composed is incorrect hence, denied the case of appellatant does not fall within the domain of Notification dated 30-10-2009 hence, not eligible for annual increment.
- b. That ground b, of the instant service appeal as composed is incorrect hence, denied.
- c. That ground c, of the instant service appeal as composed is incorrect hence, denied as comprehensive reply has already been given in the Para No. 4 of the Factual Objections.
- d. That ground d, of the instant service appeal as composed is incorrect hence, denied as comprehensive reply has already been given in the Para No. 4 of the Factual Objections.
- e. That ground e, is incorrect hence, denied as the service appeal of the appellatant is not maintainable in its present form as there is no final order.

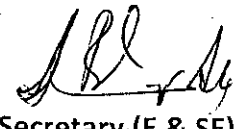
- f. That ground f, of the instant service appeal is incorrect hence, denied.
- g. That the respondents seek permission of this Honourable Tribunal to advance further grounds during arguments:

It is, therefore, very humbly prayed that in the light of forgoing comments the appeal in hand may graciously be dismissed with cost throughout.

  
District Education Officer (M)  
Abbottabad.  
(Respondent No. 3)

  
District Account Officer  
Abbottabad  
(Respondent No. 4)

  
Director (E & SE)  
E & SE, KPK, Peshawar.  
~~X~~ (Respondent No. 2)

  
Secretary (E & SE) KPK  
Peshawar.  
(Respondent No. 1)



**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD.**

**Appeal No. 778/2018**

Ishtiaq Ahmed.....Appellant

**VERSUS**

Govt of Khyber Pakhtunkhwa & Others .....Respondents

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS**

**AFFIDAVIT**

I, Mr. Qazi Tajjamal Hussain, District Education Officer (M) Abbottabad, do hereby affirm and declare on oath that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

  
**DEPONENT**

5

Annex D<sub>2</sub>

P-36

GOVERNMENT OF N.W.F.P  
FINANCE DEPARTMENT  
(REGULATION WING)

NO. FD (PRC) 5-2/2002  
Dated Peshawar the: 30-10-2009

The Secretary to Govt. of NWFP,  
Elementary & Secondary Education Department,  
Peshawar.

Subject: GRANT OF ANNUAL INCREMENT / RUNNING PAY TO  
UNTRAINED TEACHERS IN THE LIGHT OF SUPREME  
COURT JUDGMENT.

Dear Sir,

I am directed to refer to this Department letter No.FD (PRC) 5-2/2002,  
dated 30-03-2009 on the subject noted above and to say that certain quarters have  
raised some queries about the subject matter which are clarified as under:-

- i. All those untrained teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring / completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.
- ii. The above benefit would also be admissible to all those retired teachers who fulfil the above conditions.
- iii. The above benefit would not be admissible to those who themselves resigned, or were removed / terminated from service.

2. This Department letter of even number dated 30-03-2009 shall be deemed to have been modified to the above extent.

Yours Faithfully,

(SHAUKAT ULLAH)  
SECTION OFFICER (SR-1)

*Attested*  
*[Signature]*  
Multan Advocate Arshad Khan Jano  
Advocate High Court  
Office No 33 Adjacent to  
Distt. Bar Abbottabad

Enclst: of even No. & date.

Copy for information and necessary action:-

1. Accountant General, NWFP.
2. All District Coordination Officers, NWFP.
3. All District / Agency Accounts Officers, NWFP / FATA.

*Qazi Mahmood Ali*  
PRESIDENT  
of Teachers' Association,  
Haram D. Sec.

*[Signature]*  
SECTION OFFICER (SR-1)

cases to any  
plaintiff  
share, or  
praise  
subject