

23.09.2019

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Sajid, ADO (Litigation) on behalf of respondents No. 1 & 2 and Mr. Hussain Ahmed, Assistant Account Officer on behalf of respondent No. 3 present.

Representatives of the respondents submitted para-wise comments on behalf of respondents No. 1 to 3 which are placed on record. The appeal is posted for arguments before D.B to 18.11.2019. The appellant may submit rejoinder within a fortnight, if so advised.

CHAIRMAN 

18.11.2019

Appellant alongwith his counsel and Mr. Ziaullah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant submitted application for withdrawal of the appeal with the permission to file afresh appeal on the basis of notification of Finance Department dated 22.05.2019. The application is placed on record. The request of the appeal is genuine, therefore, the application is accepted. The appeal is dismissed as withdrawn with the permission to the appellant to file afresh appeal subject to all legal objections. File be consigned to the record room.

ANNOUNCED

18.11.2019


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

17.06.2019

Appellant in person present and requested for adjournment on the ground that his counsel is not available today. Adjourned to 24.07.2019 for preliminary hearing before S.B.


(Muhammad Amin Khan Kundi)
Member

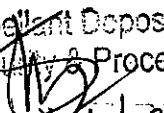
24.07.2019

Appellant in person present.

Contends that he was appointed as Class-IV in GPS Abad Canal Road, Mardan on contract basis. Subsequently his services were regularized but with effect from 01.07.2008 instead of date of his first appointment. That, in a number of cases the Apex Court as well as this Tribunal has held that upon regularization the period rendered by a civil servant on contract basis is to be counted towards his length of service for the purpose of seniority and pension benefits.

In view of the available record and contentions of appellant, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 23.09.2019 before S.B.

Appellant Deposited
Security & Process Fee


24/7/19


Chairman

Before the Service Tribunal KPK Peshawar

Appeal No: 1366/2018

Pervez Ahmed vs Director of (EESE) ^{Per}
_{etc}

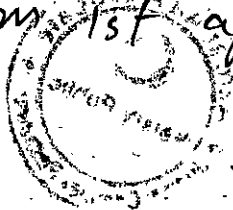
Service Appeal

Subject: Application for withdrawal of Appeal with permission to file a fresh appeal on the basis of notification of finance deptt: dated 22/5/2019

POF
MA

18/11/2019 Respectfully sheweth:-

1. That above mentioned appeal is fixed for today on 18/11/2019.
2. That finance department issued notification dated 22/5/2019, whereby all employee who are completed more than 10 years service including contract service, he is entitled for Pensionary, so, as per said notification appellat is entitled for Pensionary benefit w.e. of 10/4/2004 ie from 1st appointment of appellat,



hence appellant is requesting for withdrawal of appeal with permission to approach before appropriate forum on fresh cause of action.

3. That there is no bar on the withdrawal of instant appeal.

It is therefore, humbly requested that above captioned appeal may please be withdrawn with permission to file a fresh appeal on fresh cause of action.

Dated 18/11/2019

Appellant
Pervez Ahmed

Through Counsel:-
Yousuf

محمد یوسف

Affidavit

I, undersigned declare on oath that the contents of application are true and correct to the best of my knowledge and belief.

ATTESTED



Deponent محمد علی

16-11-2019



1. That above mentioned appeal is fixed for today on 18/11/2019.

2. That Finance department issued notification dated 22/5/2019, whereby all employees who are completed more than 10 years service including contract service, he is entitled for Pensionary, so, as per said notification appeal is entitled for Pensionary benefit w.e.f 10/4/2004 is from 1st appointment of appellant.

Respectfully Shown:-

Subject: Application for withdrawal of Appeal with permission to file a fresh appeal on the basis of notification of Finance Deptt: dated 22/5/2019

Service Appeal

Peary Anand vs Director of (ESSE) etc

Appeal No: 1366/2018

Before the Service Tribunal KPK Reshwar

hence appellant is requesting for withdrawal of appeal with permission to approach before appropriate forum on fresh cause of action.

3. That there is no bar on the withdrawal of instant appeal.

It is therefore, humbly requested that above captioned appeal may please be withdrawn with permission to file a fresh appeal on fresh cause of action.

Appellant
Pervez Ahmed

Dated 18/11/2019

Through Counsel:-

Y. A. M. S.

محمد علی

Affidavit

I, undersigned declare on oath that the contents of application are true and correct to the best of my knowledge and belief.

ATTESTED



Deponent Pervez Ahmed

18-11-2019



1. That above mentioned appeal is fixed for today on 18/11/2019.

2. That finance department issued notification dated 22/5/2019, whereby all employees who are completed more than 10 years service including contract service, he is entitled for Pensionary, so, as per said notification. appeal is entitled for Pensionary benefit w.e.f 10/4/2004 is from 1st appointment of appellant.

Respectfully Shown:-

Subject: Application for withdrawal of Appeal with permission to file a fresh appeal on the basis of notification of finance deptt: dated 22/5/2019

Service Appeal

Pavay Anand vs Director of (E & S) P&T etc

Appeal No: 1366/2018

Before the service Tribunal KPK Reshams

hence appellant is requesting for withdrawal of appeal with permission to approach before appropriate forum on fresh cause of action.

3. That there is no bar on the withdrawal of instant appeal.

It is therefore, humbly requested that above captioned appeal may please be withdrawn with permission to file a fresh appeal on fresh cause of action.

Appellant
Pervez Ahmed

Dated 18/11/2019

Through Counsel:-
Y. A. Akbar

Affidavit

I undersigned declare on oath that the contents of application are true and correct to the best of my knowledge and belief.

ATTESTED



Deponent Pervez Ahmed

18-11-2019

28.03.2019

Appellant in person present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Due to strike of the Bar learned counsel for the appellant is not available today. Adjourned to 29.04.2019 for further proceedings before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

29.04.2019

Counsel for the applicant present.

This application is for restoration of Appeal No. 1366/2018 which was dismissed for non-prosecution on 16.01.2019.

The application has been submitted on 30.01.2019 which is within the time prescribed for the purpose. More so, the contentions of petitioner in term that notice of appearance was not issued to him for 16.01.2019 appears to be correct. No duplicate^{te}~~te~~ to the requisite notice is available on the file.

In view of the above, the application is allowed and Appeal No. 1366/2018 is restored to its original number.



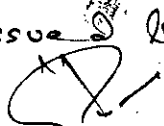
To come up for preliminary hearing on 17.06.2019 before S.B.


Chairman

Form-A
FORM OF ORDER SHEET

Court of _____

Appeal's Restoration Application No. 43/2019

| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1 | 30.1.2019 | <p>The application for restoration of appeal No.1366/2018 submitted by Mr. Yaqub Khan Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR <u>30/1/19</u></p> |
| 2 | | <p>This restoration application is entrusted to S. Bench to be put up there on <u>18-2-19</u></p> <p style="text-align: right;"> CHAIRMAN</p> |
| | 18.02.2019 | <p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for further proceedings on 28.03.2019 before S.B. Notice be issued to the respondents.</p> <p style="text-align: right;"> Member</p> |

16.1.2019

Nemo for appellant.

It is now 2.35 P.M and the case has been called several times while no one is in appearance on behalf of the appellant,

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



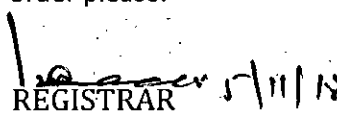
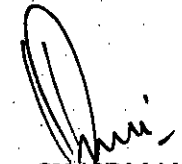

Chairman

Announced:
16.1.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1366/2018

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 05/11/2018 | <p>The appeal of Mr. Pervez Ahmad presented today by Mr. Yaqub Khan 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 5/11/18</p> |
| 2- | 17-11-2018 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>29-11-18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| | 29.11.2018 | <p>Appellant absent. Learned counsel for the appellant absent. Adjourned. To come up for preliminary hearing on 16.01.2019 before S.B</p> <p style="text-align: right;"> Member</p> |

Before the Hon'able Service Tribunal KPK, Peshawar

Appeal No. 1366 /2018

Pervez Ahmad

.....appellant

VERSUS

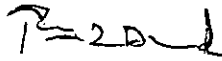
Govt, of KPK through Secretary Education Peshawar.


.....Respondents

INDEX

| S.No | Descriptions | Annex: | Pages |
|------|--|--------|-------|
| 1 | Grounds of Appeal | | 1-5 |
| 2 | <i>Copy of service book of appellant</i> | A | 6-15 |
| 3 | <i>Copy of letter dated 21/06/2017</i> | B | - 16 |
| 4 | <i>Copy of attendance registered</i> | "C" | 17-19 |
| 5 | Copy of application | "D" | - 20 |
| 6 | Copy of departmental appeal | "E" | 21-22 |
| 7 | Copy of W.P and Judgment | "F" | 23-25 |
| 8 | Wakalat Nama | | - 26 |

Dated 31/10/2018


Appellant Pervez Ahmad


Through Counsel: Yaqoob Khan advocate High
Court at Distt: Courts
Mardan.

Before the Service Tribunal KPK Peshawar

①

Appeal No. 1366 /2018

Pervez Ahamd sonof Zaristan resident of Mistri Abad Canal Road
Tehsil & District Mardan

.....appellant

VERSUS

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1600

Dated 05/11/2018

1. Director of (E & SE), of KPK Peshawar
2. District Education Officer (Male) Mardan.
3. District Account Officer District Mardan

.....Respondents

Appeal Under Section-4 of KPK Service Tribunal Act
1974 for regularization of service of appellant w.e.f
dated of 1st appointment i-e 10/04/2004 instead of
01/07/2008 and granting of pensionary benefit on the
supernation of 60 x years age on retirement to the
appellant on the basis of regular service of appellant w-
e-f 10/04/2004 to 30/06/2017 (13 years and 02 months
which is qualifing service for pension of appellant for
which appellant filed representation/ departmental
appeal before respondent No.1.

Filed to-day
Registrar
05/11/18.

Respectfully Sheweth;

Appellant humbly submits as under

1. That appellant was appointed as class-iv in Government Primary School Abad Canal Road Tehsil & District Mardan

on contract basis. *(Copy of service book of appellant is attached as Annex: "A")*.

2. That appellant performed his service up to the entire satisfaction of his superiors.

3. That service of the appellant was regularized in BPS-1 w-e- f 01/07/2008 instead of appointment order of appellant i- w 10/04/2004 vide order No.3450/G dated 10/04/2004 which is evident from the service book of the appellant which is already attached while, appellant is entitled for regularization of his service from the date of appointment i-e 10/04/2004 as per KPK Regularization Act 2005 and KPK Regularization Act 2009 accordingly.

4. That appellant has performed his duty with entire satisfaction of his superior up to 06/06/2017 and stood retired from service on 06/06/2017 without pension on attaining of his 60 years age vide letter dated 21/06/2017.

(Copy of letter dated 21/06/2017 is Annex: "B").

5. That appellant performed his duty and received fix pay upto regularization of his service. *(Copy of attendance registered is attached as Annex: "C")*.

6. That appointment of appellant is against regular post is a watch man in G.P.S Mistri Abad Tehsil & District Mardan.

7. That appellant's salary was fixed Rs.2800/- per month as a fix salary which is even less than minimum wages of worker and against the judgment of Supreme Court of Pakistan and against the section 17 of KPK Civil Servant Act i-e entitlement of pay of the post.
8. That appellant filed numerous applications for grant of regular pay, annual increments and pension before the respondents but in vain. (Copy of application is attached as Annex: "D").
9. That appellant filed departmental appeal dated 27/12/2017 but in vain. (Copy of departmental appeal is attached as Annex: "E").
10. that appellant approached before the August Peshawar High Court Peshawar in Writ Petition No.1720/2018 which was dismissed in limini with the direction that petitioner can approach Service Tribunal if even there is no final order of departmental appeal within specific period, beside it under Article 212 of the constitution of Pakistan 1973, here is specific bar on this court to entertain such like petition vide order/ judgment dated 11/10/2018. (Copy of order/ judgment and W.P is attached as Annex: "F").
11. That it is a recurring cause of action as appellant is not receiving pension each and every month.

12. That findings, no other efficacious remedy, appellant approached this Hon'able court on the following grounds.

GROUNDS:

- A. That as per the KPK Regularization Act 2005, KPK Regularization Act 2009, appellant is entitled for regularization of his service w-e-f date of appointment of appellant i-e 10/04/2004 and not from 01/07/2008.
- B. That the post of appellant is regular and appellant is entitled for pay of the post as visible from service book.
- C. That the appellant is entitled for minimum wages as per minimum Wages Act as well as judgment of august Supreme court in suo Moto case for employees in Government department.
- D. That appellant is entitled for running pay scale and regulation.
- E. That appellant is entitled for regularization as per Regularization Act 2005 and Regularization Act 2009 as held in multiple judgments by this Hon'able court and august Supreme Court.
- F. That appellant is entitled for pension as stood retired on age of superannuation.
- G. That it is strange that Government is granting old age pension to the workers employed in private factories/ companies and ignoring their own employees who gave sweat to the Government department.
- H. Because appellant is entitled to be dealt as per Article 4 of the constitution.

- I. That appellant has been discriminated violating Article 25/27 of the Constitution 1973.
- J. That similarly, placed officials/ employees field numerous writ petition before the Hon'able Peshawar High Court which are accepted in their favour vide order and judgment of this Hon'able court dated 26/10/2017 and as per the reported judgment of Apex Supreme court of Pakistan 1996 SCMR p- 1185, appellant is also entitled for extension of same benefit.

Prayer

it is, therefore, humbly prayed that on acceptance of this appeal, service of the appellant may please be regularized from the date of appointment as per KPK Regularization Act 2005, KPK Regularization Act 2009 being working against regular sanction post and may please be granted running his scale/ annual increments granted pay and pension. Any other relief deemed fit may also be graciously awarded.

Dated 31/10/2018

Pervez Ahmad

Appellant Pervez Ahmad

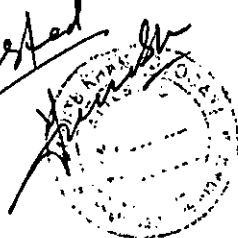
Yaqoob Khan

Through Counsel: Yaqoob Khan advocate High Court at Distt: Courts Mardan.

Affidavit:-

I undersigned declare on oath that the contents of appeal of appellant are true and correct to the best of my knowledge and belief.

Deponent Pervez Ahmad

Attested


Ang A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY
MARDAN.

6

APPOINTMENT ORDER

Consequent upon the recommendations of land donor, Head of Institutions and approved by the District Coordination Officer Mardan, the competent authority is pleased to appoint

Mr. Perviz Khan S/O Zariftan L/D

resident of Mastri Abad against Ghowkidar Post

at Rs.2800/- Per Month fixed on contract basis at GPS Mastri Abad for the period of

three years contract on the terms and conditions given below:

Terms & Condition

1. His appointment is made purely on contract basis for 03 years only and is liable to termination at any time with out assigning any notice or reason.
2. He is allowed to draw fix pay in which his appointment order issued from this office.
3. His contract period can be renewed after 03 years if his performance is found excellent.
4. He is required to produce his health and age Certificate from the Medical Superintendent DHO Hospital Mardan.
5. He is not allowed to take over charge of his post if his age is less than 18 year or more than 45 years on the date of taking over charge.
6. He is required to sign contract agreement forms with the Education Department before taking over charge.
7. No TA / DA is allowed.
8. The Service Rules Frame by the Government from time to time will govern him.

(HAJI FAZAL RABBI KHAN)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN

3450/G

Endstr: No /Deceased Sons Quota File AE IV Dated 10/4/2004.

Copy forwarded for information & necessary action to the :-

1. PS to Minister Education NWFP Peshawar.
2. P.A to Secretary Schools & Literacy Department NWFP Peshawar.
3. P.A to Director Schools & Literacy Department NWFP Peshawar.
4. P.A to Zilla Nazim District Council Mardan
5. P.A to District Coordination Officer Mardan.
6. District Accounts Officer Mardan.
- 7-8 District Officer (Male / Female) Schools & Literacy Mardan.
- 9-12 Deputy District Officer (Male / Female) Tehsil Takht Bhai & Mardan.
13. Principal / H/M concerned.
14. Candidates concerned.

12/11/08
By: Distt Officer
(Male) Mardan

EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN.

Attested
[Signature]

[Signature]

7/11/08

جارج روری

7

آء عیوگہ 2004-4-10 کو ال آرڈر نمبر 3450/9 کے تحت
3 ریفرنس نمبر کے تحت ترقی پاد سے ریٹائرمنٹ کے بارے میں سوال

4 Teachers
3 ریفرنس نمبر کے تحت ترقی پاد سے ریٹائرمنٹ کے بارے میں سوال
Jalil
10-4-
Abad

Attested
Jaffer
Asstt. Distt. Officer (Insp)
P.W. Teh: Mardan

12/11/08
By Distt. Officer
(Male) Mardan

10/4/08 31/9/08

21/04/08 1987

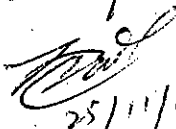
7/11/08

Attested
M. A. H. ASSOCIATE
ESTD
K. J. COM. P. W. MARDAN

8

MEDICAL CERTIFICATE


Name of Official..... Pervaz Khan
 Caste or race..... Muslim
 Father's name..... Zaristan near
 Residence..... Misiri Abad, Raw Hazi Mardan
 Date of birth..... 1956
 Exact height by measurement..... 5-5
 Personal mark of identification..... Mole on R/ face
 Signature of the Official.....
 Signature of head of office.....

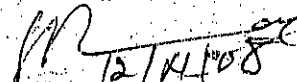
Took over charge on
 10.4.04

 25/11/04

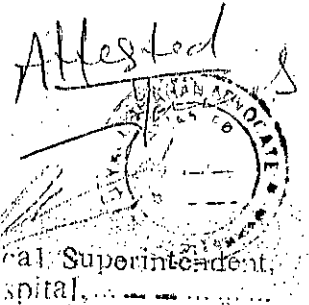
Head of Office

I do hereby certify that I have examined Mr. Pervaz Khan a candidate for
 employment in the Office of the EDO (S&L) Mardan
 and can not discover that he had any disease communicable or other constitutional
 affection or bodily infirmity except NIL

I do not consider this as disqualification for employment in the office of the as
as. Chawkida his age according to his own statement 42 year and by
 appearance about 42 year.


 17/11/04


 12/11/04
 Svt District Officer
 (Male) Mardan

Attested

 Medical Superintendent,
 Civil Hospital

LEFT HAND THUMB AND FINGER IMPRESSIONS.....

04.10/4/04

Anx A

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

 9

1. Name: PERVIZ AHMAD AHMAD

2. Race: ZARISTAN.

3. Residence: Kanal Road Masri Road

4. Father's name and residence: ZARISTAN.

5. Date of birth by Christian areas nearly as can be ascertained: 1956. Masri Road

6. Exact height by measurement: 5' 7"

7. Personal marks for Identification: A Black Mole on right face.

8. Left hand thumb and Finger Impression of (non-Gazetted) Officer.



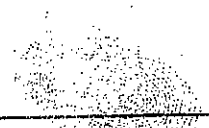
Little Finger



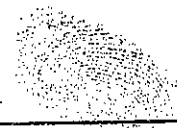
Ring Finger



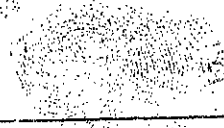
Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant


Perviz Ahmad

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

[Signature]
D.D.O. (M) P/y: Mardan.

Attested
[Signature]

| 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 courts 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 |
| B-1 (2800/- P.M. <i>fixed</i>) | | | | | | | |
| Chartered | | | A. 2800/- P.M. <i>fixed</i> | | | 10 ⁴ / ₂₀₀₄ | <i>Fixed</i> |
| | | | 3100/- P.M. | | | 1 ¹² / ₀₄ | <i>Fixed</i> |
| do | | | 3500/- P.M. | | | 1 ⁷ / ₂₅ | <i>Fixed</i> |
| do | | | 4000/- P.M. | | | 1 ² / ₀₆ | <i>Fixed</i> |
| do | sub/off | Reorganized in BPS No. 1 @ (Rs. 1370-55-3520) | R. 1870/- P.M. | | | 10 ⁰⁴ / ₀₄ | <i>Fixed</i> |
| do | do | Revised BPS No. 1 @ (Rs. 2150-65-4100) | R. 1925/- P.M. | | | 1 ¹² / ₀₄ | <i>Fixed</i> |
| do | do | | R. 2215/- P.M. | | | 1 ⁰⁷ / ₀₅ | <i>Fixed</i> |
| do | do | | R. 2280/- P.M. | | | 1 ¹² / ₀₅ | <i>Fixed</i> |
| do | do | Revised BPS No. 1 @ (Rs. 2475-75-4725) | R. 2345/- P.M. | | | 1 ¹² / ₀₆ | <i>Fixed</i> |
| do | do | | R. 2700/- P.M. | | | 1 ⁰⁷ / ₀₇ | <i>Fixed</i> |
| do | do | Revised BPS No. 1 @ (Rs. 2770-90-3670) | R. 2775/- P.M. | | | 1 ¹² / ₀₇ | <i>Fixed</i> |
| do | do | | R. 3330/- P.M. | | | 1 ⁰⁷ / ₀₈ | <i>Fixed</i> |
| | | | R. 3480/- P.M. | | | 1 ¹² / ₂₀₀₈ | |

Attached


11

| 9 Signature and signation of the head of the office or other attesting officer in attestation of columns 1 to 8 | 10 Date of termination of appoint- ment | 11 Reason of termination (such as promotion, transfer, dismissal, etc.) | 12 Signature of the head of the office or other attesting officer | 13 Leave | | 14 Signature of the head of the office or other attesting officer | 15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant | |
|---|---|--|---|--|---|---|--|---------------------------------|
| | | | | Nature and duration of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government | | | |
| | | | | | Period | | | Government to which debtible |
| <i>[Signature]</i> | 12/15 | Resign | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/05 | P.R. | <i>[Signature]</i> | Contract | Appointed as clerk on CP 2800/- P.M. Fund with E.D.O (S.V.) Madurai order No. 3450/1 dt. 10/10/09 | | | |
| <i>[Signature]</i> | 30/06 | P.R. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 1/07 | Regularized in BPS No. 1 | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/04 | A/mct. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/06/05 | Pay Revision | <i>[Signature]</i> | | | | Conversion of Fixed pay class in regular post in BPS No. 1 CP Fund Scheme vide Govt. NWEP Finance Deptt. No. BAI/FO/1-22, 2003-09 dated 30/07/03 w.e.f. the taking over charge with back benefit from 1/07/08 | |
| <i>[Signature]</i> | 30/11/05 | A/mct. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/06 | A/mct. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/06/07 | Pay Revision | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/07 | A/mct. | <i>[Signature]</i> | | | | Service verified w.e.f. 10/07/07 30/11/07 from the Agri; roll and other records of this office. | |
| <i>[Signature]</i> | 30/06/08 | Pay Revision | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/2008 | A/mct. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | | BPS 5 11/07 | <i>[Signature]</i> | | | | | |

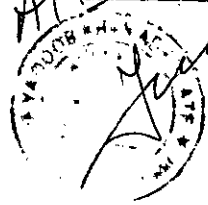


MF. 56
Draw diff. of 17 of Nov or 06 of Nov
B-1
P. 1333- (u m)
HRA (891 x u)
MA (50 x u)
Dear Al. (u x u)
Wang M. (30 x u)
P.P.A (289 x 3)
M.R (352 x u)
D.A
2009/3564/
2009/1607/
120/
1156/
1156/
1408/
T. 8864/

| 9 Signature and position of the head of the office or other attesting officer in statements of Forms 1 to 8 | 10 Date of termination of appoint- ment | 11 Reason of termination (such as promotion, transfer, dismissal, etc.) | 12 Signature of the head of the office or other attesting officer | 13 Leave | | 14 Signature of the head of the office or other attesting officer | 15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant |
|---|---|--|---|--|---|---|--|
| | | | | Nature and duration of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government | | |
| | | | | Period | Government to which debtible | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 21/8 | Spec Ret. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | Up to 1-7-07 | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 21/8 | Mal. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | Allowed 1-7-07 to the right of Govt Dept Cell etc, PD | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | Pay Ret. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | 30 (1-7-07) 2/2 of 1-7-07 and Cell etc, PD (SR-1) max 2-07 | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | 11-12-7-07 of 2nd by DHO | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | Mal. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | (M) M.C. No 6873-6 dt 12/13 1-07-07 and will be allo for 6-15-30-6-07 | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | Mal. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | | | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | Allowed one 8-12-07 to the right of Govt of NWFP Province | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | Pay Ret. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | Dept regulate (M) Mardan No. FDC (SC-1) 2-4/2008 dt 4/4/09 and Form 10 issued by the DHO Mardan No 7183-97 dt 8-7-07 | | |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | Mal. | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | | | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan |
| <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | 26/8 | As all is available in 13/113 DHO | <i>[Signature]</i> Sub Div. Education Officer (M) Mardan | | OPTION I hereby give an option for reflexion of my pay B- with avail Annual increment in the basis as permissive under No. FD (PRC) 1-1/86-VI (A) dt 1-5-1986. | | |

[Signature]
Sub Divisional Edu. Officer
(Male) Mardan

Signature of Official
[Signature]
Sub Divisional Edu. Officer
(Male) Mardan



| 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 courts 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 |
| Charakidew 7 PS Mistri Abad | Sub Off | | Rs. 6600/pm | | | 1.12.12 | |
| dr | dr | | Rs. 6770/pm | | | 1.12.13 | |
| dr | One pres-matur Int | | 6430 | | | 1.12.13 | |
| dr | | | 11/2014 | | | 1.7.14 | |
| dr | | | Rs. 6770/ | | | 1.12.14 | |
| dr | | | Rs. 8755/ | | | 1.7.15 | |
| dr | Next Sta pres-matur Int | BPS No 4 @ RL (6770-260-1570) | Rs. 9130/ | | | 1.7.15 | |
| dr | cutting attestation | | 9430 | | | 1.12.15 | |
| dr | Sub Divi; Educ Officer (Male) Maroon | | Rs. 9430/ | | | 1.12.15 | |

62 60/11
8 133/15

Office of the Accountant General
Khyber Pakhtun Khwa Peshawar
Fixed in the Revised Basic Pay Scale
Pay Fixed @ Rs. 6260/- w.e. 01-07-2014
R.A.R.S. 635220/2935
Pay Fixed @ Rs. 8255/- w.e. 01-07-2014
Date of Next Increment 01-07-2015

Revised B-4
3/16
W
DAG
1/3

Alkhalaf
[Signature]

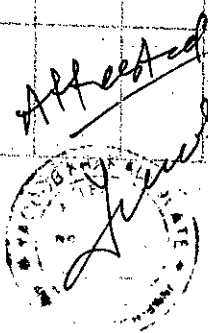
| 9 | 10 | 11 | 12 | 13 | | 14 | 15 | |
|---|------------------------------------|--|--|------------------------------------|--|--------------------------------|--|--|
| | | | | Leave | | | | |
| Signature and designation of the head of the office or other attesting officer in attestation of columns 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 | 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 | | 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 |
| | | | | | Period | Government to which debitabale | | |
| | 30.11.13 | A/out | | | | | | |
| | 30.6.14 | Des & Defect 2 A/sum Pre-emptive or sleep reduced 1-2 | | | | | | |
| | 30.11.14 | A/out | | | | | | |
| | 30.6.15 | P/Retard | | | | | | |
| | 1.7.15 | Approved 2 Step Promote | | | | | | |
| | 30.11.15 | A/out | | | | | | |

Enquiry Report
 Two A/sum. J. M. Singh
 stopped at case.
 Under DEO (M) Mardan No 976
 dt. 11/4/2017.

TR No. 877 dt. 9-1-15
 Amount of pay & allowance
 Rs. 138307/- decr 1985/
 Net 133322/- by way of
 pay for 2/14 To 31/10/15

MF No 833
 16
 Drawn 11689/- as sum of
 currency 10-4 w/ 1-11-15
 to 29-1-16
 VS (9330-8925) 1065/
 HAD (972-910)
 DR 15 (943-892) 138/
 26/8

76435/1
 DR
 DHO
 CH
 OFFICE ORDER
 Consequent upon the receipt of complaint
 lodged by M. S. D. S.
Enquiry Report
 In light of Enquiry report conduct
 against the official.
 See his pay till the time the bring
 1 to his retirement.
 Two animal J. M. Singh may be kept
 or one he may be kept under observat
 for the month.
 if he not become a gamble man then
 Substant of Enquiry Report
 DEO (M) M No 976 dt. 11/4/15



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

ENCASHMENT OF LPR/RETIREMENT

Aux B
16/19

In Pursuance Khyber Pakhtunkhwa Govt Servants Leave rule 1981, revised vide Notification NO. SOG/E&SE/2-4/2012 Dated 18-12-2012, sanction is hereby accorded to the grant of Encashment of LPR w.e.f 01-07-2015 to 30-06-2016 (365 days) in respect of Mr. Pervez Ahmad Chowkidar GPS No.1 Mistri Abad.

He is further allowed to proceed on retirement from the Government service w.e.f 30-06-2016 (After Noon) after completing his 60 years of Age.

Note:

Necessary entry to this effect should be made in his service Book.

This is final order and will not be reverted /withdrawn at any stage.

Sh
(IJAZ ALI KHAN)

DISTRICT EDUCATION OFFICER
(MALE) MARDAN

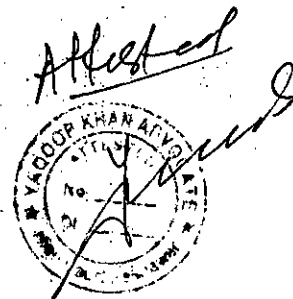
Endst.No. 5872-74 /Dated: 21-6-2017

Copy forwarded to the:-

1. SDEO(M) Mardan along with Service Book
2. DAO Mardan.
3. Official concerned.

Attested
Jamil

Khalid 20/6/17
DISTRICT EDUCATION OFFICER
(MALE) MARDAN



| پروگرام | | P.S.T اعجاز علی | | | | P.S.H.T محمد شہید | | | | تاریخ |
|------------|----|-----------------|-------|-------|------------|-------------------|-------|-------------|-------|-------|
| نام مدرسہ | | آمد | دستخط | روائی | دستخط | آمد | دستخط | روائی | دستخط | آمد |
| پروگرام 1 | 1 | | | | LABOUR DAY | | | | | |
| پروگرام 2 | 2 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 3 | 3 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 4 | 4 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 5 | 5 | | | | AB 11/15 | AB 7/15 | | Jolly phone | | |
| پروگرام 6 | 6 | | | | AB 12/15 | AB 7/15 | | ABSENCE | | |
| پروگرام 7 | 7 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 8 | 8 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 9 | 9 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 10 | 10 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 11 | 11 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 12 | 12 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 13 | 13 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 14 | 14 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 15 | 15 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 16 | 16 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 17 | 17 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 18 | 18 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 19 | 19 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 20 | 20 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 21 | 21 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 22 | 22 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 23 | 23 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 24 | 24 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 25 | 25 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 26 | 26 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 27 | 27 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 28 | 28 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 29 | 29 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 30 | 30 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |
| پروگرام 31 | 31 | | | | AB 12/15 | AB 7/15 | | ON DUTY | | |

referred hand
 checked at is
 Retired from
 17/5/2017

HEAD TEACHER
 G.P.S. Ministry
 Karachi

Allocated

| بھارت | سابقہ | بھارت | سابقہ | بھارت | سابقہ | بھارت | سابقہ | بھارت | سابقہ |
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18
 سر محمد ضری بھٹو
 (Signature)

گورنمنٹ پرائمری سکول، اے۔ اے۔ مستری آباد، مردان، کوئٹہ نمبر 37490
 اپریل 2017ء

| نمبر | پرو میٹر احمد | | | ای جاز علی P.S.T | | | P.S.H | | |
|------|---------------|-------|-------|------------------|-------|-------|-------|-------|-------|
| | آمد | دستخط | رواگی | آمد | دستخط | رواگی | آمد | دستخط | رواگی |
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| 30 | 12/1 | | | | | | | | |
| 31 | 12/1 | | | | | | | | |

مستری ایجنٹ
 ای جاز علی
 (Signature)

Physically
 Absent
 Sick

Handwritten notes

Handwritten notes

Handwritten notes

| نمبر | حالت | سابقہ | میزان | حالت | سابقہ | میزان | حالت | سابقہ | میزان | حالت | سابقہ | میزان |
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| 31 | حالت | سابقہ | 05 | حالت | سابقہ | 04 | حالت | سابقہ | 02 | حالت | سابقہ | 03 |

رہسٹر حاضر می مارچ

گورنمنٹ پبلک سکول، مستوی آباد مردان

بابت ماہ مئی ۲۰۱۷ء

19

| پرویز احمد چوکیدار | | | اعجاز علی PST | | | محمد حبیب اللہ PSHT | | |
|--------------------|-------|-------|---------------|-------|-------|---------------------|-------|-------|
| چوکیدار | | | نائب مدرس | | | نائب مدرس | | |
| آدم | دستخط | رواگی | آدم | دستخط | رواگی | آدم | دستخط | رواگی |
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TEACHER
ADMISSION

| حالت | سابقہ | میزان | حالت | سابقہ | میزان | حالت | سابقہ | میزان | حالت | سابقہ | میزان |
|------|-------|-------|------|-------|-------|------|-------|-------|------|-------|-------|
| | | | | | | | | | | | |

To:-

The Distt: Education Officer
(M) Mardan.

Aux D

~~20~~
20

Subject: Application for regularization of service and granting pension to the applicant on the basis of said regular service of applicant.

Respectfully Sheweth:-

1. That applicant was appointed as a class IV/ Watchman in GPS Mistryabad Kanal Road Mardan vide order dated 10/4/2004 on Contract basis.
2. That Govt: of KPK has issued amended Act for regularization of all contract employees who are serving on contract against the post of regular civil servant, so, applicant is entitled for regularization of my service w.e.f 10/4/2004 instead of 17/7/2008.
3. That applicant is also entitled for pension w.e.f 10/4/2004 being regular employees/civil servant.

It is therefore, humbly requested that service of applicant may please be regularized w.e.f 10/4/2004 and may please be granted pension being regular employees on superannuation of my 60 years age.

Dated 21/12/2016.



Yours faithfully
Pervez Ahmad

(24) ~~21~~ Annex E

Before The Director of E & SE KPK Peshawar

Pervez Ahmed s/o Zaristan R/o vill: Misteyabad
Kanal Road Mardan, Presently serving as a class IV/
watchman in GPs Misteyabad Mardan. Appellant
VS

Distt: Education Officer (M) Mardan.
Respondent.

Departmental Appeal/Representation for regularization
of service of appellant w.e.f 10/4/2004 instead of
1/7/2008 and granting of Pension to the appellant
on the basis of regular service of appellant
w.e.f 10/4/2004 to 30/6/2017 (13 years and 2m
which is qualifying service for Pension of appellant

Respectfully sheweth:-

1. That applicant/appellant was appointed as a
class IV / watchman in GPs Misteyabad
Kanal Road Mardan vide order dated 10th/₂₀₀₄
2. That appellant has served with respondent
with entire satisfaction of his superior.

3. That service of appellant was regularized on the basis of KP regularization Act 2005, w.e.f. 1/7/2008 instead of 10/4/2004, which is illegal, against law and facts.
4. That appellant has submitted various applications before Respondent for regularization of my service but in vain. (Copy applications attached).
5. That the date of birth of appellant is 1956 and going to retire from service on superannation of 60 years age.
6. That appellant is requesting for regularization of his service w.e.f. 10/4/2004 instead of 1/7/2008 and also is entitled for pension on his qualifying service w.e.f. 10/4/2004 to 6/6/2017 (13 years and 2 months).

It is therefore, humbly prayed that on acceptance of this appeal, service of appellant may please be regularized w.e.f. 10/4/2004 instead of 1/7/08 and may please be granted pension to the appellant for his qualifying service w.e.f. 10/4/2004 to 6/6/2017.

Appellant: - Pervez

Pervez Ahmed s/o Zaristan
R/o - Mistrabad Mardan

17/3/2017



Before The Peshawar High Court Peshawar



Aux F
23

W.P.No. 1720 / 2018

Pervez Ahmad sonof Zaristan resident of Mistri Abad Canal Road
Tehsil & District Mardanpetitioner

VERSUS

1. Govt, of KPK through Secretary Education Peshawar.
2. Director of (E & SE) KPK Peshawar.
3. District Education Officer (Male) Mardan.
4. District Account Officer District Mardan

.....Respondents

Writ petition under Article 199 of the constitution of
Islamic Republic of Pakistan 1973.

FILED TODAY
Deputy Registrar

22 MAR 2018

PRAYER,

On acceptance of this writ petition, service of the petitioner may please be regularized from the date of appointment as per KPK Regularization Act 2005, KPK Regularization Act 2009 being working against regular sanction post and may please be granted running his scale/ annual increments granted pay and pension.

ATTESTED
EXAMINED
Peshawar High Court

16 OCT 2018

(24)

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

| Date of order. | Order or other proceedings with the order of the Judge |
|----------------|---|
| 11.10.2018 | <p style="text-align: center;">W.P.No.1720-P of 2018.</p> <p>Present: Mr.Yaqoob Khan, advocate for the petitioner. Mr.Moin-ud-Din Hamayun, AAG for the respondents.</p> <p style="text-align: center;">-----</p> <p style="text-align: center;"><u>MUHAMMAD AYUB KHAN, J.-</u> Petitioner through the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 seeks issuance of an appropriate writ directing the respondents to regularize his service from the date of appointment as per Khyber Pakhtunkhwa Regularization Act 2005, Khyber Pakhtunkhwa Regularization Act, 2009 being working against regular sanction post. He also sought for the grant of his scale/annual increments, pay and pension.</p> <p>2. As per writ petition, petitioner was appointed as Chowkidar at Government Primary School Mistri Abad, Mardan on contract basis vide order dated 10.04.2004. His services were regularized in BPS-1 with effect from 01.07.2008 instead of 10.04.2004. He stood retired on 06.06.2017 on attaining the age of superannuation without pension. He preferred Departmental Appeal on 27.12.2017 but in vain, hence this petition.</p> <p>3. Preliminary arguments heard and available record gone through.</p> <p>4. Under section 2(b) of the Khyber Pakhtunkhwa, Civil</p> |

ATTESTED
EXAMINER
Peshawar High Court

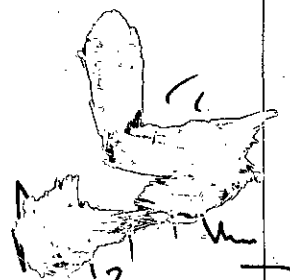
16 OCT 2018

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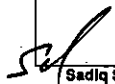
Servants Act, 1973, Civil Servant means a person who is or has been a Civil Servant within the meaning of Constitution of Islamic Republic of Pakistan, 1973. Petitioner is a retired civil servant. Dispute regarding pension/annual increment of a civil servant squarely falls in terms and conditions of a civil servant, hence, Services Tribunal is vested exclusive jurisdiction in such like matters. It has persistently been held by this Court as well as by the august Supreme Court of Pakistan that a civil servant, if aggrieved by a final order, whether original or appellate, passed by the departmental authority with regard of his/her terms and conditions of service, the only remedy available to him/her would be filing of appeal before the Services Tribunal even if the case involves vires of particular Rule or notification.

5. Petitioner is not sure if his departmental appeal has been accepted or otherwise. He can approach Services Tribunal if even there is no final order of the departmental authority within specified period. Beside it, under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, there is specific bar on this Court to entertain such like petitions.

6. In the situation the present writ petition is dismissed in limine.



JUDGE



Sadq Shah, PS (DB) (Hon'ble Justice Musarrat Hilali and Hon'ble Mr. Justice Muhammad Ayub Khan)

No. 8555
 Date of Presentation of Application 11-10-18
 No of Pages 09
 Copying Fee 38
 Urgent Fee
 Total
 Date of Preparation of Copy 10-10-18
 Date of Delivery of Copy 10-10-18
 Received By

~~CERTIFIED TRUE COPY~~
 EXAMINER
 Peshawar High Court, Peshawar
 Authorized Under Article 8.7 of
 The Courts (Shah Wali) Order 1994
 16 OCT 2018

بعد البت سندھ ہائی کورٹ فیصلہ

کورٹ فیس

مورخہ: 31/10/2018 20 منجانب ریلوے

مقدمہ: لٹریچر احمد بنام: ریلوے کونسل

دعویٰ: رسل

جرم:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام لٹریچر سے لئے لٹریچر سے لئے لٹریچر سے لئے لٹریچر سے لئے مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی نکل کاروائی کا حامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زراں پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمد ہوگی اور منسوخ دائر کرنے کی اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مذکور کے عمل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برداشتہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 31 ماہ اکتوبر 2018ء

بد گواہ شدہ الع

بمقام: لٹریچر کے لئے منظور ہے۔

Attested & Accepted

Yaqub Ali



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

S.A No: 1366/2018

Parvez Ahmad S/O Zaristan R/O Mistri Abad Canal Road Tehsil and District
Mardan.....appellant

Versus

Govt of KPK through Secretary Education Peshawar and Others..... Respondents

INDEX

| S.NO | DESCRIPTION OF DOCUMENTS | ANNEXURE | PAGES | |
|------|--|----------|-------|----|
| 1. | Para wise comments along with affidavit | | 01 | 03 |
| 2. | Copy of retirement order& Service Book | "A" B | 04 | 10 |

Respondent


District Comptroller of Accounts

 Mardan 

Dated:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

S.A No: 1366/2018

Parvez Ahmad S/O Zaristan R/O Mistri Abad Canal Road Tehsil and District
Mardan..... Appellant

Versus

Govt of KPK through Secretary Education Peshawar and Others..... Respondents

Para Wise comments on behalf of Respondent No 1&2

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action & locus standi to file the instant service appeal.
2. That the instantservice appeal is incompetent hence not maintainable in the eye of law.
3. That the instantservice appeal is badly time bared.
4. That the appellant has not come to this honorable court with clean hands.
5. That the appellant concealed the material facts and kept this honorable Tribunal in dark.
6. That the appellant is not competent to file the service appeal against the respondent.
7. That the instantservice appeal is merit less and liable to be dismissed.

ON FACT:

1. Para No 1 pertains to record, hence need no comments.
2. Para No 2 pertains to record, hence need no comments.
3. Para No 3 pertains to record, however the appellant is not entitled for regularization of his service from the date of his appointment i.e. 10-04-2004. The appellant was regularized in BPS-01 w.e.f. 01-07-2008 and the appellant was retired from the government service w.e.f 30-06-2016 after completing his sixty (60) years. The appellant has performed total regularized service 8 years which is less than 10 years due to which he is not entitled for pensionary benefits, hence need no comments.

(Copy of Retirement Order & service book are as Annex-"A" & B)

4. Para No 4 pertains to record, however the petitioner retired from service on 30-06-2016, hence need no comments.
5. Para No 5 pertains to record, hence need no comments.
6. Para No 6 pertains to record, hence need no comments.
7. Para No 7 is incorrect, baseless as the appellant is neither a worker nor employee of a private factory or company, the appellant is a government servant and is bound the term and conditions of the government, hence denied.
8. Para No 8 pertains to record, hence need no comments.



11. Para No 10 is incorrect, baseless as no any cause of action is got by the appellant, hence denied.
12. That the detailed reply of the ground has been given below.

GROUND:

- A. Para A is incorrect, baseless against facts, as the appellant is not entitled for regularization of his service from the date of his appointment i.e. 10-04-2004. The was regularized in BPS-01 w.e.f. 01-07-2008 and the appellant was retired from government service w.e.f 30--06--2016 after completing his sixty (60) years. The appellant has performed total regularized service 8 years which is less than 10 years due to which he is not entitled for pensionary benefits, hence denied.
- B. Para B pertains to record, hence need no comments.
- C. Para C need no comments as each and every case has their own merit.
- D. Para D pertains to record, however the appellant is entitled from the date of his regularization date i.e. 01-07-2008, hence need no comments.
- E. Para E pertains to record, need no comments as each and every case has their own merit.
- F. Para F is incorrect, against facts as the appellant is not entitled for the pension which is thoroughly explain supra in the facts, hence denied.
- G. Para G is incorrect, baseless as the petitioner is neither a worker nor employee of a private factory or company, the petitioner is a government servant and is bound the term and conditions of the government, hence denied.
- H. Para H need no comments.
- I. Para I is incorrect, baseless as the petitioner has not been discriminated and no any violation of Article 25/27 of the constitution of Pakistan 1973 is made on the part of the answering respondent, hence denied.
- J. Para J need no comments as each and every case has their own merit.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.

Respondent


District Comptroller of Accounts

Mardan 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWA

S.A No: 1366/2018

Parvez Ahmad S/O Zaristan R/O Mistri Abad Canal Road Tehsil and District
Mardan..... Petitioner


Versus

Govt. of KPK through Secretary Education Peshawar and Others..... Respondents

AFFIDAVIT

I, Mr. Hussain Ahmad Legal Advisor District Comptroller Of Accounts Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by Respondent is true to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent


Hussain Ahmad
16101-7575123-9

Annexure A

Retirement Order (Photo Copy)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

ENCASHMENT OF LPR/RETIREMENT

Annex A
16/5

In Pursuance Khyber Pakhtunkhwa Govt Servants Leave rule 1981, revised vide Notification NO. SOG/E&SE/2-4/2012 Dated 18-12-2012, sanction is hereby accorded to the grant of Encashment of LPR w.e.f 01-07-2015 to 30-06-2016 (365 days) in respect of Mr. Pervez Ahmad Chowkidar GPS No.1 Mistri Abad.

He is further allowed to proceed on retirement from the Government service w.e.f 30-06-2016 (After Noon) after completing his 60 years of Age.

Note:

Necessary entry to this effect should be made in his service Book.

This is final order and will not be reverted /withdrawn at any stage.

[Signature]
(IJAZ ALI KHAN)

DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endst:No. 5872-74 /Dated: 21-6-2017

Copy forwarded to the:-

1. SDEO(M) Mardan along with Service Book
2. DAO Mardan.
3. Official concerned.

Attested
[Signature]

[Signature] 20/5/17
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

30-6-16
10-4-04
1-7-08
30-4-7
(B)

Anx B

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: پرویز احمد آهواند
PERVIZ AHMED AHANUD

(9)

2. Race ZARISTAN.

3. Residence Kamal Road Mesri Abad
Hoti Mardan



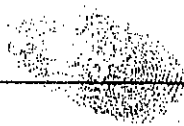
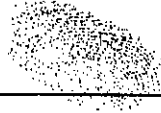
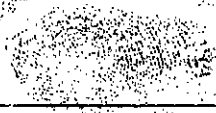
4. Father's name and residence ZARISTAN.

5. Date of birth by Christian areas nearly as can be ascertained 1956. MINDIP F.N.C.

6. Exact height by measurement. 5' 7"

7. Personal marks for Identification A Black Mole on right face.

8. Left hand thumb and Finger Impression of (non-Gazetted) Officer.

| | | | |
|---------------|---|-------------|--|
| Little Finger |  | Ring Finger |  |
| Middle Finger |  | Fore Finger |  |
| Thumb |  | | |

9. Signature of Government Servant P. Ahnud

10. Signature and Designation of the Head of the Office, or other Attesting Officer.
D.D.O. (M) P. Mardan.

Ann A
6

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY
MARDAN.

APPOINTMENT ORDER

Consequent upon the recommendations of land donor, Head of Institutions and approved by the District Coordination Officer Mardan, the competent authority is pleased to appoint

Mr. Perviz Khan S/O Zariftan L/D

resident of Mastri Abad against Chowkidar Post
at Rs.2800/- Per Month fixed on contract basis at GPS Mastri Abad for the period of
three years contract on the terms and conditions given below:

Terms & Condition

1. His appointment is made purely on contract basis for 03 years only and is liable to termination at any time with out assigning any notice or reason.
2. He is allowed to draw fix pay in which his appointment order issued from this office.
3. His contract period can be renewed after 03 years if his performance is found excellent.
4. He is required to produce his health and age Certificate from the Medical Superintendent DHO Hospital Mardan.
5. He is not allowed to take over charge of his post if his age is less than 18 year or more than 45 years on the date of taking over charge.
6. He is required to sign contract agreement forms with the Education Department before taking over charge.
7. No TA / DA is allowed.
8. The Service Rules Frame by the Government from time to time will govern him.

(HAJI FAZAL RABBI KHAN)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN

3450/6

Encls: No _____ /Deceased Sons Quota File AE IV Dated 10/4/2004.

Copy forwarded for information & necessary action to the :-

1. PS to Minister Education NWFP Peshawar.
2. P.A to Secretary Schools & Literacy Department NWFP Peshawar.
3. P.A to Director Schools & Literacy Department NWFP Peshawar.
4. P.A to Zilla Nazim District Council Mardan
5. P.A to District Coordination Officer Mardan.
6. District Accounts Officer Mardan.
- 7-8 District Officer (Male / Female) Schools & Literacy Mardan.
- 9-12 Deputy District Officer (Male / Female) Tehsil Takht Bhai & Mardan.
13. Principal / IIM concerned.
14. Candidates concerned.

12/11/08
By: District Officer
(Male) Mardan

EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN.

Attested
Javed

11/11/08

(10)

| 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 courts 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 |
| B-1 (2800/- P.M. Fried) | | | | | | | |
| Charakledes | | | Rs. 2800/- P.M. Fried | | | 10/4/2004 | Fried |
| do | | | 3100/- P.M. | | | 1/12/04 | Pengland |
| do | | | 3500/- P.M. | | | 1/7/05 | Pengland |
| do | | | 4000/- P.M. | | | 1/7/06 | Pengland |
| do | Reorganized in BPS No. 1 @ (Rs. 1870/- 55-3520) | | Rs. 1870/- P.M. | | | 10/04/04 | Pengland |
| do | do | | Rs. 1925/- P.M. | | | 1/12/04 | Pengland |
| do | do | Revised BPS No. 1 @ (Rs. 2150/- 65-4100) | Rs. 2215/- P.M. | | | 1/07/05 | Pengland |
| do | do | | Rs. 2280/- P.M. | | | 1/12/05 | Pengland |
| do | do | | Rs. 2345/- P.M. | | | 1/12/06 | Pengland |
| do | do | Revised BPS No. 1 @ (Rs. 2670/- 75-4725) | Rs. 2700/- P.M. | | | 1/07/07 | Pengland |
| do | do | | Rs. 2775/- P.M. | | | 1/12/07 | Pengland |
| do | do | Revised BPS No. 1 @ (Rs. 3330/- 90-5670) | Rs. 3330/- P.M. | | | 1/07/08 | Pengland |
| do | do | | Rs. 3420/- P.M. | | | 1/12/2008 | Pengland |

(11)

| 9 Signature and signation of the head of the office or other attesting officer in attestation of columns 1 to 8 | 10 Date of termination of appoint- ment | 11 Reason of termination (such as promotion, transfer, dismissal, etc.) | 12 Signature of the head of the office or other attesting officer | 13 Leave | | 14 Signature of the head of the office or other attesting officer | 15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant | |
|---|---|--|---|---|---|---|--|---------------------------------|
| | | | | Nature and duration of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government | | | |
| | | | | | Period | | | Government to which debtible |
| <i>[Signature]</i> | 12/1/05 | Pay Revision | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/05/05 | P.R. | <i>[Signature]</i> | Contract | Appointed as clerk on CP 28001-201. Fund under E.D.O (S.V.) Madurai | | | |
| <i>[Signature]</i> | P.R. | 30/06/06 | <i>[Signature]</i> | SA | Order No 3450/02 dt. 10/09/09 | | | |
| <i>[Signature]</i> | 1/07/08 | Regularized in BPS No 2 | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/04 | A/mct. | <i>[Signature]</i> | | | Notification | | |
| <i>[Signature]</i> | 30/06/05 | Pay Revision | <i>[Signature]</i> | | | Conversion of Fixed pay class; in regular est post in BPS No. 2 CP Fund Scheme vide Govt. NWEP Finance Deptt. No. B&F/1-22, 2003-09 dated 30/07/03 w e t the taking over charge with back receipt from 1/07/08 | | |
| <i>[Signature]</i> | 30/11/05 | A/mct. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/06 | A/mct. | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/06/07 | Pay Revision | <i>[Signature]</i> | | | | | |
| <i>[Signature]</i> | 30/11/07 | A/mct. | <i>[Signature]</i> | | | Service verified w e t 10/09/09 | | |
| <i>[Signature]</i> | 30/06/08 | Pay Revision | <i>[Signature]</i> | | | 30/11/07 from the Agri; roll and other records of this office. | | |
| <i>[Signature]</i> | 30/11/2008 | A/mct. | <i>[Signature]</i> | | | | | |
| E.D.O. (R) P Madurai | BPS 5 11/04 | | D.D.O. (R) P Edu. Madurai. | | | | | |

MF. 5/11/09.
Draw diff. of P. & Nam on 06/9 awarded
P. 1333-4 m)
HMA (891 x m)
MA (51 x m)
D. 11/11/09
W. 11/11/09
S. 11/11/09
R. 11/11/09
D. 11/11/09

| 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. | Pay in substantive post | Additional Pay for Officiating | Other emolument falling under the term "Pay" | Date of Appointment | Signature of Government Servant |
| Charakidas SPS District Abad | Sub/II | | Rs. 6600/pm | | | 1.12.12 | |
| dr | dr | | Rs. 6770/pm | | | 1.12.13 | |
| dr | one prescriptive post | | 6430 | | | 1.12.13 | |
| dr | | | 11/2014 | | | 1.7.14 | |
| dr | | | Rs. 6770/ | | | 1.12.14 | |
| dr | | | Rs. 8755/ | | | 1.7.15 | |
| dr | Next Sr. prescriptive post cutting attested | | Rs. 9130/ | | | 1.7.15 | |
| dr | | | 9430 | | | 1.12.15 | |
| | Sub Div. Edu. Officer (Male) Mardan | | Rs. 9430/ | | | 1.12.15 | |

62 65/11
8 753/15

Office of the Accountant General
Khyber Pakhtun Khwa Peshawar
Fixed in the Revised Basic Pay Scale
Pay Fixed @ Rs. 6260/- w.e.f. 01-07-2014
R.A.R.S. 635226/2935
Pay Fixed @ Rs. 8250/- w.e.f. 01-07-2015
Date of Next Increment 01-07-2015

Adding 15% in pay fixation
3116
DAR
4/5

15

| 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
|--|--------------------------------|-----------------------|---------------------|--------|----------|-------|--|--|-------|-----------|
| Signature and Position of the head of office or other acting officer in execution of Column 1, 2 & 3 | Date of termination of service | Reason of termination | Name of the officer | Rank | Office | Leave | Remarks | Date | Place | Signature |
| S.D.E. (M) MARDAN | 30/1/2016 | Retired | [Name] | [Rank] | [Office] | | Awarded 2 months P.P. under the provisions of the Govt of India No. 100/10/50 (1957) dated 17/1/58 | | | |
| Sub-Div. Edu. Officer (Male) Mardan | 30/1/2016 | | [Name] | [Rank] | [Office] | | | | | |
| Sub-Div. Edu. Officer (Male) Mardan | | | | | | | | | | |
| | | | | | | | | Service Verified with 15 to 30 from Acq. Roll and other record of this Office. | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | Recovery of out of State Amount. | | | |
| | | | | | | | payable to till to | | | |
| | | | | | | | has been drawn as | | | |
| | | | | | | | to Rs. 77500/- | | | |
| | | | | | | | recoverable amount | | | |
| | | | | | | | which needs to be | | | |
| | | | | | | | deposited into Govt | | | |
| | | | | | | | treasury. | | | |

Ro P

RoP was 7/01/16 to 31/07/17 (77574/-)
 To Comd of 77574/- from 31/07/17
 30/6/16 with 100/- on 4/01/17 with 100/-
 150 D.H. 6/6/2017

Sub-Div. Edu. Officer
 (Male) Mardan

Recovery of out of State Amount.
 payable to till to
 has been drawn as
 to Rs. 77500/-
 recoverable amount
 which needs to be
 deposited into Govt
 treasury.

Sub-Div. Edu. Officer
 (Male) Mardan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

S.A No: 1366/2018

Parvez Ahmad S/O Zaristan R/O Mistri Abad Canal Road Tehsil and District
Mardan.....appellant

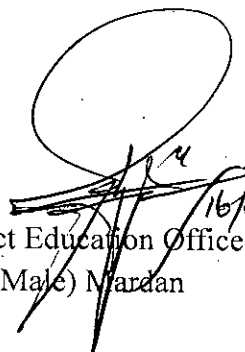
Versus

Govt of KPK through Secretary Education Peshawar and Others..... Respondents

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| 2. | Copy of retirement order & Service Book | "A" B | 04 | 10 |

Respondent No 2


District Education Officer
(Male) Mardan

Dated: _____

(Signature)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

S.A No: 1366/2018

Parvez Ahmad S/O Zaristan R/O Mistri Abad Canal Road Tehsil and District
Mardan..... Appellant

Versus

Govt of KPK through Secretary Education Peshawar and Others..... Respondents

Para Wise comments on behalf of Respondent No 1&2

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(Copy of Retirement Order & service book are as **Annex-"A"& B**)


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8. Para No 8 pertains to record, hence need no comments.
9. Para No 9 pertains to record, hence need no comments.
10. Para No 10 pertains to record, hence need no comments.

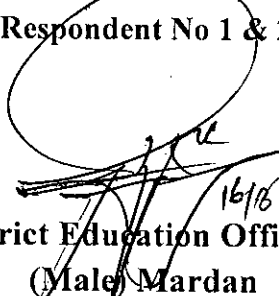
11. Para No 10 is incorrect, baseless as no any cause of action is got by the appellant, hence denied.
12. That the detailed reply of the ground has been given below.

GROUND:

- A. Para A is incorrect, baseless against facts, as the appellant is not entitled for regularization of his service from the date of his appointment i.e. 10-04-2004. The was regularized in BPS-01 w.e.f. 01-07-2008 and the appellant was retired from government service w.e.f 30--06--2016 after completing his sixty (60) years. The appellant has performed total regularized service 8 years which is less than 10 years due to which he is not entitled for pensionary benefits, hence denied.
- B. Para B pertains to record, hence need no comments.
- C. Para C need no comments as each and every case has their own merit.
- D. Para D pertains to record, however the appellant is entitled from the date of his regularization date i.e. 01-07-2008, hence need no comments.
- E. Para E pertains to record, need no comments as each and every case has their own merit.
- F. Para F is incorrect, against facts as the appellant is not entitled for the pension which is thoroughly explain supra in the facts, hence denied.
- G. Para G is incorrect, baseless as the petitioner is neither a worker nor employee of a private factory or company, the petitioner is a government servant and is bound the term and conditions of the government, hence denied.
- H. Para H need no comments.
- I. Para I is incorrect, baseless as the petitioner has not been discriminated and no any violation of Article 25/27 of the constitution of Pakistan 1973 is made on the part of the answering respondent, hence denied.
- J. Para J need no comments as each and every case has their own merit.

It is therefore humbly prayed that in the light of above facts, the appeal may please be dismissed with cost.


Director (E & S E)
KPK, Peshawar.

Respondent No 1 & 2

16/10/19
District Education Officer
(Male) Mardan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWA

S.A No: 1366/2018

Parvez Ahmad S/O Zaristan R/O Mistri Abad Canal Road Tehsil and District
Mardan..... Petitioner

Versus

Govt of KPK through Secretary Education Peshawar and Others..... Respondents

AFFIDAVIT

I, Mr. Sajid Khan Legal Advisor Education Department Mardan do hereby solemnly affirm and declare that the contents of Para Wise Comments submitted by Respondents No 1 to 3 are true to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent


Sajid Khan

16101-6005318-5

04
Annex = "A"
Annex
(4)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN
ENCASHMENT OF LPR/RETIREMENT

In Pursuance Khyber Pakhtunkhwa Govt Servants Leave rule 1981, revised vide Notification NO. SOG/E&SE/2-4/2012 Dated 18-12-2012, sanction is hereby accorded to the grant of Encashment of LPR w.e.f 01-07-2015 to 30-06-2016 (365 days) In respect of Mr. Pervez Ahmad Chowkidar GPS No.1 Mistri Abad.

He is further allowed to proceed on retirement from the Government service w.e.f 30-06-2016 (After Noon) after completing his 60 years of Age.

Note:


Necessary entry to this effect should be made in his service Book.
This is final order and will not be reverted /withdrawn at any stage.

Sh
(IJAZ ALI KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endst.No. 5872-74 /Dated: 21-6-2017

Copy forwarded to the:-

1. SDEO(M) Mardan along with Service Book
2. DAO Mardan.
3. Official concerned.

Attested
Javed


Khalid 20/6/17
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Attested by
[Signature]
14/8/19

Annex B (5)

| 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 courts 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 |
| B-1 (2800/- P.M. fixed) | | | | | | | |
| Charaldeo | | | Rs. 2800/- PM fixed | | | 10/4/2004 | Paid |
| | | | 3100/- PM | | | 1/12/04 | Paid |
| do | | | 3500/- PM | | | 1/2/05 | Paid |
| do | | | 4000/- PM | | | 1/7/06 | Paid |
| do | Revised BPS No. 1 @ (Rs. 1870-55-532) | | Rs. 1870/- PM | | | 10/04/04 | Paid |
| do | do | | Rs. 1925/- PM | | | 1/12/04 | Paid |
| do | Revised BPS No. 1 @ (Rs. 2150-65-4100) | | Rs. 2215/- PM | | | 1/07/05 | Paid |
| do | do | | Rs. 2280/- PM | | | 1/12/05 | Paid |
| do | do | | Rs. 2345/- PM | | | 1/12/06 | Paid |
| do | Revised BPS No. 1 @ (Rs. 2470-75-4725) | | Rs. 2700/- PM | | | 1/07/07 | Paid |
| do | do | | Rs. 2775/- PM | | | 1/12/07 | Paid |
| do | Revised BPS No. 1 @ (Rs. 3330-90-5670) | | Rs. 3330/- PM | | | 1/07/08 | Paid |
| do | do | | Rs. 3420/- PM | | | 1/12/2008 | |

est of at

(X) (6)

| 9 Signature and signature of the head of the office or other attesting officer in attestation of columns 1 to 8 | 10 Date of termination of appoint- ment | 11 Reason of termination (such as promotion, transfer, dismissal, etc.) | 12 Signature of the head of the office or other attesting officer | 13 Leave | | 14 Signature of the head of the office or other attesting officer | 15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant | | | | | | | | | | | | | | | | | | |
|---|---|--|---|---|--|---|--|----------------------------------|------|---------------|------|-------------|------|--------------------|------|-------------------|------|--------------|------|-------------|------|----|------|--------------|-------------|
| | | | | Nature and dura- tion of leave taken | Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government | | | | | | | | | | | | | | | | | | | | |
| | | | | | Period | | | Government to which debitable | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 12/10/05 | P/L | <i>[Signature]</i> | | | | | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/05/05 | P/L | <i>[Signature]</i> | Contract | SA | | Appointed as clerk on Ch 28001-PM, Fund with E.D.O. (S.V.) Mardam order No 3450/a dt. 10/4/09 | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/06/06 | Regularized in BPS No 1 | <i>[Signature]</i> | | | | | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/11/04 | A/mct. | <i>[Signature]</i> | | | | Notification Conversion of Fixed pay class into regular post in BPS No. 3 CP Fund Scheme vide Govt. NWFP Finance Deptt. No BAI/FO/1-22, 2003-09 dated 30/02/08 w.e.f. the taking over charge with back receipt from 07/08 | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/05/05 | Pay Revision | <i>[Signature]</i> | | | | | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/11/05 | A/mct. | <i>[Signature]</i> | | | | | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/11/06 | A/mct. | <i>[Signature]</i> | | | | | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/06/07 | Pay Revision | <i>[Signature]</i> | | | | | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/11/07 | A/mct. | <i>[Signature]</i> | | | | Service verified 12th 10/07/08 from the Agri. cell and other record of this office. | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/06/08 | Pay Revision | <i>[Signature]</i> | | | | M.F. 56/11/09. Drawn diff. of 2nd Nov 06 of Mardam B-10000-1-07 to 31-10-08 | | | | | | | | | | | | | | | | | | |
| <i>[Signature]</i> | 30/11/2008 | A/mct. | <i>[Signature]</i> | | | | <table border="1"> <tr><td>Prd (3330 in mv)</td><td>2084</td></tr> <tr><td>MRA (891 x 2)</td><td>3564</td></tr> <tr><td>MA (50 x 2)</td><td>2000</td></tr> <tr><td>Deh. Al. (100 x 2)</td><td>1600</td></tr> <tr><td>Wag. no. (30 x 2)</td><td>1200</td></tr> <tr><td>PA (285 x 2)</td><td>1156</td></tr> <tr><td>MA (30 x 2)</td><td>1156</td></tr> <tr><td>DA</td><td>1156</td></tr> <tr><td>TOTAL</td><td>8864</td></tr> </table> | Prd (3330 in mv) | 2084 | MRA (891 x 2) | 3564 | MA (50 x 2) | 2000 | Deh. Al. (100 x 2) | 1600 | Wag. no. (30 x 2) | 1200 | PA (285 x 2) | 1156 | MA (30 x 2) | 1156 | DA | 1156 | TOTAL | 8864 |
| Prd (3330 in mv) | 2084 | | | | | | | | | | | | | | | | | | | | | | | | |
| MRA (891 x 2) | 3564 | | | | | | | | | | | | | | | | | | | | | | | | |
| MA (50 x 2) | 2000 | | | | | | | | | | | | | | | | | | | | | | | | |
| Deh. Al. (100 x 2) | 1600 | | | | | | | | | | | | | | | | | | | | | | | | |
| Wag. no. (30 x 2) | 1200 | | | | | | | | | | | | | | | | | | | | | | | | |
| PA (285 x 2) | 1156 | | | | | | | | | | | | | | | | | | | | | | | | |
| MA (30 x 2) | 1156 | | | | | | | | | | | | | | | | | | | | | | | | |
| DA | 1156 | | | | | | | | | | | | | | | | | | | | | | | | |
| TOTAL | 8864 | | | | | | | | | | | | | | | | | | | | | | | | |
| D.D.O. (M) P Mardam | | BPS 5 11/10/08 | D.D.O. (M) P Edw. Mardam | | | | | | | | | | | | | | | | | | | | | | |

[Handwritten notes]

(17)

(7) (8)

| 9 | 10 | 11 | 12 | 13 | | 14 | 15 | |
|---|------------------------------------|--|---|---|--|--|----|-------------------------------|
| | | | | Nature and duration of leave taken | Leave | | | |
| | | | | | Period | | | Government to which debitible |
| Signature and position of the head of office or other attesting officer in 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 | Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government | 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> Sub Divl. Education Officer (M) Mardan | 31/8 | Spcl. on | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Ret. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/8 | Ret. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |
| <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | 30/11 | Mal. | <i>[Signature]</i> Sub Divl. Education Officer (M) Mardan | Allowed BSK-02 due to expired | | | | |

Sub Divisional Officer (M) Mardan

OPTION
I, Mst. Servez Ahmad do hereby give an option for deferral of my pay B-1 with effect from 02-11-2007 after availing Annual Increment in my pay on presumptive basis as per Government notification No. FD(Proc)-1/86-VI (2), dated 15-5-1986.

Signature of Official

OK

8

AK

| 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 courts 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 |
| Chaskiden 7PS Mistri Akbar | Sub/II | | Rs. 6600/PM | | | 1.12.12 | [Signature] |
| | | | Rs. 6770/PM | | | 1.12.13 | [Signature] |
| | One permanent post | | Rs. 6430/PM | | | 1.12.13 | [Signature] |
| | | | Rs. 6600/PM | | | 1.7.14 | [Signature] |
| | | | Rs. 6770/PM | | | 1.12.14 | [Signature] |
| | | | Rs. 8750/PM | | | 1.7.15 | [Signature] |
| | Present SH Permanent post cutting attestation | | Rs. 9130/PM | | | 1.7.15 | [Signature] |
| | | | Rs. 9430/PM | | | 1.12.15 | [Signature] |
| | Sub Divi: Edu: Officer (Male) Mardan | | | | | | |

6265/11
9753/17

Office of the Accountant General
Khyber Pakhtun Khwa Peshawar
Filed in the Revised Basic Pay Scale
Pay Fixed @ Rs. 6265/- w.e.f. 01-07-2017
E.A.R.S. 4255220/2015
Pay Fixed @ Rs. 8750/- w.e.f. 01-07-2015
Date of Next Increment 01.07.2019

3/16
43
DAD

(A)

(B) (C)

| Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 4 | 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 award or praise of the Government Servant |
|---|------------------------------------|--|--|--------|-------------------------------|--|---|
| | | | | Period | Government to which debitible | | |
| <i>[Signature]</i> | 30.11.13 | About | <i>[Signature]</i> S.D.E.O MARDAN | | | | |
| <i>[Signature]</i> | 30.6.14 | About | <i>[Signature]</i> S.D.E.O (M) MARDAN | | | | |
| <i>[Signature]</i> | 30.6.15 | Resort | <i>[Signature]</i> S.D.E.O (M) MARDAN | | | | |
| <i>[Signature]</i> | 1-7-15 | About | <i>[Signature]</i> S.D.E.O (M) MARDAN | | | | |
| <i>[Signature]</i> | 30.11.15 | About | <i>[Signature]</i> S.D.E.O (M) MARDAN | | | | |

Enquiry Report

Two A/Asst. Dy. Magrs
staffed at court
Under DEO (M) Mardan No 976
dt. 11/4/2015

TR No 277 dt 9-1-15

Amount of pay to allowance
Rs. 138307/- decd 1985/
Net 133322/- by way of
pay for 2/14 To 31/10/14

20430/1

Office order

Consequent upon the receipt of complaint
concerning the above

Enquiry Report

For receipt of Enquiry report conducted
against the official.
Self his pay bill the time the bill was
1. 2. his 2/14/15
3. From amount of pay was withheld
as and the amount kept under observation
to the amount.
3. If he must become a suitable person
Sub-Dept of Enquiry Report
DEO (M) Mardan No 976 dt 11/4/15

Sub-Div. Enquiry Officer

Dec 6
Deduct
2
A/Asst
Dec 19
02 steps
reduced
1/11/15

MF No 833

Order 11689/- as and 7
amounting 2-4 w.e.f 1/11/15
to 29/16

VS (9330-8925) 1065/

HA 2 (972-910)

DA 15 (943-892) 128/

[Signature]
DAS
24/6

(Handwritten marks)
 (1) (2) (3)

| 9 | 10 | 11 | 12 | 13 | 14 | 15 |
|---|-------------------------------------|--|---|---|--|---|
| Signature and designation of the head of the office or other attesting officer in 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 for each month for which leave salary is payable in similar Government service. | Reference to any order number or other record or file number, or other document with which the termination of service is connected. |
| S.D.E.O (M) Mardan | 30/11/2016 | Resigned | Sub Div. Edu. Officer (Male) Mardan | Awarded 2 months leave on average pay for the period from 07/11/2016 to 07/01/2017 vide Govt. of J.K. Order No. K.A. (SP)/1-7/2016 dated 27/11/2016 | Government of J.K. which is available. | |
| Sub Div. Edu. Officer (Male) Mardan | 30/11/2016 | | Sub Div. Edu. Officer (Male) Mardan | | | |
| Sub Div. Edu. Officer (Male) Mardan | | | | | | |
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S.D.E.O (M)
MARDAN
Service Verified w.e.f. 12/11/16 to 30/11/16 from Acq. Roll and other records of this Office.

ROP
 ROP was 7/10/16 to 31/17 Rs. 177524/-
 To Comd. of J.K. Govt. Rd. from source was 7/30/16/16 with no action 4/07 with ch. no 150 D.H. 6/6/2017

Recovery of out stand amount.
 pay w.e.f. 7/16 to 31/17 has been drawn amount to Rs. 177524/- recoverable amount which needs to be deposited into Govt Treasury.

Sub Div. Edu. Officer
(Male) Mardan

Sub Div. Edu. Officer
(Male) Mardan

