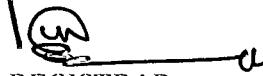


Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_  
Case No.- 1346/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/09/2022	<p>The appeal of Mr. Muhammad Iqbal resubmitted today by Mr. Khan Afsar Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman  REGISTRAR</p>

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL**  
**KYBER PAKHTUNKHWA PESHAWAR**

*Appeal No 1346/2022*

**Muhammad Iqbal**

**Versus**

**Government of Khyber Pakhtunkhwa through Secretary Commerce  
Peshawar**

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**Service Appeal against Promotion Order**

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**Index**

S.No	Name of Documents	Annexure	Page No.
01	Memo of Appeal	Nil	1-3
02	Service Book + Appointment Letter	A	4-28
03	Order of adjustment of appellant as Naib Qasid	B	29-34
04	Copy of Notification No.SO1(IND)8-4/88-vol-11/4608	C	35-36
05	Copy of Seniority list issued by respondent No.4	//	37-46
06	Grevience Notice send by appellant dated 22-08-2022	D	47
07	Petition of condoning of delay	Nil	48-49
08	Wakalat Nama	Nil	50

*[Signature]*

**Muhammad Iqbal Appellant  
Through Counsel**

*[Signature]*  
Khan Afsar Advocate  
High Court District Bar Haripur

BEFORE THE CHAIRMAN SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA PESHAWAR

*Appeal No. 1346/2022*

Muhammad Iqbal Junior Clerk (Since Retired), Government college of Management Sciences, Haripur R/O Khallabat Township, Tehsil & District Haripur.....(Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Commerce, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Finance, Peshawar.
3. Director General Commerce Education and Management Sciences Khyber Pakhtunkhwa Rano Ghari, Peshawar.
4. Director of Manpower & Training Occupational, Rehabilitation Benevolent Fund, Building Hall No. 210/11Saddar Road, Peshawar Cant.
5. District Account Officer, Haripur.....(Respondents)

Service Appeal Under Section 04 of Khyber Pakhunkhwa Service Tribunal Act, 1977 against the impugned promotion Order No. 1-1/92-S dated 11-01-1992 whereby Appellant was deprived from promotion to the post of Junior Clerk (BPS-11) in violation of Rules & Regulation Circulated through Notification No.SO1(IND)8-4/88-Vol-11/4608 dated 3<sup>rd</sup> April 1990.

Prayer:

*On acceptance of instant appeal, the promotion Order No. 1-1/92-S dated 11-01-1992 may graciously be set aside by declaring it illegal, void ab initio, being devoid of merits and the appellant may kindly be promoted to the post of junior clerk in the light of Rules &*

***Regulation Circulated through Notification No.SO1(IND)8-4/88-Vol-11/4608 dated 3<sup>rd</sup> April 1990 along with back benefits.***

---

Respectfully Sheweth;

Appellant submits as under;

1. That the present appellant was appointed by respondent No.4 as "Workshop attendant" in 20-04-1985. (Copy of service book and appointment order is attached herewith as Annexure "A").
2. That after rendering two year service in the Department the appellant was adjusted as (Naib Qasid BPS-1) in 14-02-1987.
3. That according to Rules and Regulation Circulated through Notification No.SO1(IND)8-4/88-Vol.11/4608 dated 03-04-1990, the respondents were bound to promote the petitioner according to Rules mentioned in the said Notification but they have ignored and violated the Rules and appointed many other person as Junior Clerk by ignoring criteria of seniority. The present appellant deserves to be promoted on the basis of the seniority list issued by the respondent No.2 after, 1992.
4. That appellant was promoted by respondents as Junior Clerk in 2002 instead of 1992, by violating & ignoring the criteria and procedure mentioned in the said Notification. The petitioner promotion was due on, 1992 but the respondents have deprived the petitioner of the right. (copy of impugned promotion order shall be submitted before the Honorable tribunal when available for the reason that despite hectic efforts the appellant couldn't find the said copy)
5. That the present appellant retired in the year 2017 and his pension is the sole source of income which is very insufficient if compared with current high inflation pertaining in the country.
6. That the appellant being sole head of the whole family is responsible to meet the ends of his family needs but due to insufficient pension his financial problems are increasing day by day. If the appellant was promoted in accordance with the rules, regulations etc and within time he may have been retired in BPS-16/17 and his service benefits including pension would have been more than those he is taking presently.
7. That the respondent while ignoring the criteria, had appointed many other Officials to the post of Junior Clerks and according to the Rules, 25 percent seats of Junior Clerks had to be filled by promoting the existing officials who had rendered two years service as Naib Qasid, or otherwise. If the appellant was promoted according to Rule as Junior Clerk in 1992, he would have received pension, other service benefits according to the calculation of 1992, but unfortunately he was promoted as Junior Clerk in the year 2002 and due to this grave injustice he was deprived for ten years from the post of Junior Clerk which was his legal right. (Copy of the

Notification No. SO1(IND)8-4/88-Vol.11/4608 dated April,3,1990 attached herewith. The seniority list issued by the respondents after 1992 is also attached herewith as annexure-C.)

8. That the appellant is not a law knowing person and he was not aware of the illegal act of respondent that his promotion was due on 1992, even after his retirement he was not aware of the fact that he is deprived of from his legal right by the respondent. It came to the knowledge of appellant when he visited his relative who is a Graduate in Law who informed him about the grave injustice done to him. After arranging necessary documents, the appellant has requested the competent authority through a letter/representation for redressing his grievances but no reply or any other response was given to the petitioner. (Copy of representation/application is attached herewith as annexure-D)
9. That present appellant has a good prima facie case and has got cause of action against respondent.
10. That the cause of action arose to the appellant within the jurisdiction of this Honourable Tribunal and this Honourable Tribunal has got jurisdiction to decide the instant matter.

It is, therefore, requested before this Honourable tribunal that in the light of submissions mentioned ibid, on acceptance of instant service appeal, the grievances of petitioner may graciously be redressed by ordering the respondent to promote the petitioner as Junior Clerk from 1992 along with back benefits in accordance with the Rules Envisaged in the said Notification in the best interest of justice and any other relief which this Honourable Tribunal deems just and proper, may also be granted in favour of petitioner.

Appellant Muhammad Iqbal Through Counsel

KHAN AFSAR

ADVOCATE HIGH COURT  
AT HARIPUR.

Verification;

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

Muhammad Iqbal

## Annexure A

4

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	if officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signature of head of the other a officer in a of colum
B-1(440-10-640) Workshop Attendance	officiating	-	440/-	-	-	20 $\frac{4}{85}$ (FM) % grat.		
B-1(440-10-640) Workshop Attendant	officing	-	450/-	-	-	1 $\frac{12}{85}$ (FM) % grat		

Affidavit

PRINCIPAL  
Govt Technical  
Center (Boys) XIS H.

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 or average pay upto four months for which leave salary is debitable to another Government		
PRINCIPAL 30/4/85	Annual increment	Principal	Appointed as W. Attendant (B-1)				
			Vide Secy: PTB, Peshawar order Endia.				
			No. PTA/144/EST/1037, dt: 18-4-85				
PRINCIPAL 31-5-1986	AN.	Adjusted /Appointed in TTC, Mardan	Reported his arrival on duty on 20-4-1985 (FM) Vide order Endia.				
			No. ORC/PTB/PF/287, dt: 20/5/85.				
PRINCIPAL 31-5-1986	AN.	Adjusted /Appointed in TTC, Mardan	① Service verified from 20-4-85 to 31-12-85 and from the Acquittance Rolls maintained in this office.				
w.c.f. 1-1-86 No. SOI (IND) 2-23/86 dt: 15-5-88	regularised Notification	Principal Govt. Vocational Training Centre, Haripur	Adjusted /Appointed against the post of Workshop Attendant in TTC, Mardan Vide Notification No. SOI (IND) 2-23/86 dt: 15-5-88				
Attest Govt. Vocational Training Centre (Boys) KTS Haripur	Principal Govt. Vocational Training Centre (Boys) KTS Haripur						

Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii), whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	Sig. Go. sc
B-1 (440-10-640) Workshop Attendant	17		460/-	-		1-12-86	sig
do	17		460/-	-		1-12-86	sig
B-1 (Naib Qasid) (440-10-640) Camp			460/-	-		1-12-86	sig
			460/-	-		21/2 21/87	
		Adjusted against the Post of Naib Qasid from 21-2-1987 and entitled to pay and allowances for the Post of Naib Qasid vide Director P/S & T Peshawar's order Encl No. DMT/1 1-4-115/7076-28, dt. 3-Jan-1991.					
B-1 (600-13-860) Workshop Attendant Naib Qasid			626	-		1-7-87	sig
do	17		639/-			1-12-87	sig
		PRINCIPAL Govt Technical & Vocational Center (Boys) KTS Harbour					

8	9	10	11	12	13	14	15
				Leave			
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	
ature of overnment rvant	Signature and designation of the head of the office or other attesting officer in attestations of columns 1 to 8	Date of termination of appoint- ment	Reason of termination (such as promotion, transfer, dismissal, etc.).	Signature of the head of the office or other attesting officer	Natu- re and dura- tion of leave taken	Period	Government to which debitable

40

30 6  
89

PRINCIPALS Service Verified from 1-1-86 to 31-5-86  
from the Acquaintance Rolls maintained  
in this office. (2)

Principal  
Govt. Occupational Rehabilitation  
Training Centre, Kishlakat

6

6  
30/87 Exchange Scales.

Service verified from 1-6-86 to 31-12-86 from  
The acquitnee Roll maintained in this office. Granted  
Annual increment w.e.f. 1-12-86 (Rs. 10/- per month from  
acquitnee Roll.

To be referred at ORIE Khalakbari vide Dmt/H-166/780,  
dated 14.2.87

三

*[Signature]*  
Principal  
ORC Khalabat

Transferred from ATC Hardass to ORE Khalatbar and  
taken on the strength of the ministry's organis' the Vacant  
post of N. Oasid he has reported for duty at  
this Centre on dated 21-2-87 (EN) Serial No. ORE/H-  
CSIT/225-29 dated 21-2-87

SAKAWABE TAKIO  
Prinzipal

**Govt. Occupational Training  
Training Centres, Noida**

sd | Nawab Ali Tariq )

*Phlox*

3-11 Annual  
3-93 increment

The Pay. has been revised in the light of  
Govt. of NWP Finance Dep't. letter No. FD (P.R.)  
1-1/87-VIII, dated 2-7-87. - H. Naresh Kumar

Soh Nawab Ali Tanji

## Sovt. Occupational Rehabilitation Trainer, Dehradun, Kumaon.

sd / -

sd/c

# PRINCIPAL

11  
30-88 AN. Annual increment  
PAY

11  
88  
N. J. Arora  
Govt. Technical & Vocational Training Center (Boys) & Girls Khalabat  
PRINCIPAL  
Govt Technical & Vocational Training Center (Boys) & Girls Khalabat  
Principal  
S/o

Service until 20-2-87 to 31-1-87  
from this office. R. maintained  
in this office.

Sad/  
Principal

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
B-1 (600-13-860) <u>Workshop Attendant</u> Naib Qasid Jr.	Ty.	-	626/-	-	H.R.A 180/- (+) 50/- M/Allow.	17/87	Signed
do N/Qasid Jr. <u>Attendant B-1</u> (600-13-860)	Temp.	-	639/-	-	-	1-12-87	Signed

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KPS Hapur

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9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation 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 debitable to another Government		
				Period	Government to which debitable		
Office of the Accountant General NWFP, Peshawar. Pay fixed in the Revised Grade Scale 1987 of Rs. 600/-3-860 (P-1) at Rs. 626/- Pay ref. 1-7-1987 with next increment on 12-1987							Transferred from ATC, Marala to ORC, Malabat and taken on the strength of this Incident against the vacate post of N.Qasid, he was reported for duty at this centre, on dated 21-2-87 (F.D) Entry no. ORC/4-E87/225-24, dated 21/2/87
Sd/- Accounts Officer - Pay fixation Party							sdt-Nawab Ali Tariq Principal Govt. Occupational Rehabilitation Training Centre, Malabat.
Sd/- Nawab Ali Tariq Principal Govt. Occupational Rehabilitation Training Centre, Malabat.							The pay has been revised in the light of Finance Department of Govt. of NWFP, Paymaster Letter No. FD(PRC) 1-1/87-VIII, dt. 22/2/87.
PRINCIPAL Govt Technical & Vocational Center (BOS/KTS H2)		Service verified from 1-1-89 to 31-12-89 from the Acquittance Rolls maintained in this office.					sdt- Principal Govt. Occupational Rehabilitation Training Centre, Malabat.
PRINCIPAL 30/11 A.V. Annual increment							Service verified from 20-2-87 to 31-12-87 from the Acquittance Rolls maintained in this office.
PRINCIPAL 30/11 A.V. Annual increment							Service verified from 1-1-88 to 31-12-88 from the Acquittance Rolls maintained in this office.
PRINCIPAL 30/11 A.V. Annual increment							Service verified from 1-1-88 to 31-12-88 from the Acquittance Rolls maintained in this office.

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
Naib Qasid A workshop Attendant (600-13-860)	Temp.	Rs. -	Rs. 665/-	-	-	1-12-89 F.N.	Jafar
Naib Qasid A Workshop Attendant B-1 (920-26-1310)	--"	-	Rs. 678/-	-	-	1-12-90 F.N.	Jafar
Naib Qasid (B-1) (920-26-1310)	--"	-	Rs. 1102/-	-	-	1-6-91 F.N.	Jafar
— do —	--"	-	1154/-	-	-	1-6-91 F.N.	Jafar
— do —	--"	-	1180/-	-	-	1-12-91 F.N.	Jafar
— do —	--"	-	1206/-	-	-	1-12-92 F.N.	Jafar
— do —	--"	-	1232/-	-	-	1-12-93 F.N.	Jafar
Naib Qasid B-I (1845-35-1770)	Temp.	-	1665/-	-	-	1-6-94 (F.N.)	Jafar
— do —	Temp.	-	1786/-	-	-	1-12-94 F.N.	Jafar
— do —	Temp.	-	1735/-	-	-	1-12-95 F.N.	Jafar

F.A.I.N.C.P.A.L.  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

15  
from



12

My revised w.e.f. 30-11-2001 vide Finance  
Departmental Circular No. FD/ (P.R.C) 1-12/2001  
dated 27-10-2001

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	Occupational Training Centre, Khalabagh Additional Pay for officiating	Principal Rehabilitation Centre, Khalabagh Additional Pay falling under the term "Pay"	Date of appointment	Signature of Government servant
Naib Qasid B-1 (1845-35-1770)	Tamko	-	1720/-	-	1/12 96 P.N.	July	
Naib Qasid B-2 (1875-44-1935)	Temp.	-	1803/-	-	1/12 97 P.N.	July	
do	—	-	1847/-	-	1/12 98 P.N.	July	
do	—	-	1891/-	-	1/12 99 P.N.	July	
do	N	-	1935/-	-	1/12 2000	July	
B-1 (1870-55-3570)	cl	-	2970/-	-	1/12 2001	July	
Hostel Supply							
B-45 9100-100-5100	—	-	3100/-	-	01/02 2002 (F.N.)	July	

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

P.  
No  
G1  
a  
(B)

exc.



REVISED ENTRIES

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signature of head of the other authority in whose column
Naib Qasid B-01 (1870-55-3520)	Temp	-	8970/-	-	-	30/11/2001	J. Khal	ORC, KI
	-II	-	3025/2	-	-	1/12/2001	J. Khal	ORC
Hostel supervisor B-05 (2100-100-5100)	-II	-	3100/2	-	-	1/2/2002	J. Khal	GT.V.C
	-II	-	3200/2	-	-	1/12/2002	J. Khal	
<u>REVISED ENTRY BPS 2-BPS -a3 Moreover</u>								
BPS-01(1870-55-3520)	Temp	-	1970/-	-	-	1/12/2002	J. Khal	Govt. Tech. Khal
N.P.S. changed BPS-01(1870-55-3520)			3025/2 PPM			1/12/2002	J. Khal	Govt. Tech. Khal
Hostel supervisor/Tr. cent.								
BPS-05(2100-100-5100)			3200/-			1/03/2002	J. Khal	Govt. Tech. Khal
-II	Temp.	-	3300/-	-	-	1/12/2002	J. Khal	
			3400/-	-	-	1/12/2003	J. Khal	

**PRINCIPAL**  
Govt Technical & Vocational  
(Govt. Bovs) KTS Haripur

9	10	11	12	13		14	15	
				Leave				
		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 debitable 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.
Principal G.T.V.C. Khalabat	30/11/2002	Licence of pay Leave				Service verified from _____ to _____ from the Acquittance Rolls maintained in this office	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
Principal G.T.V.C. Khalabat	30/11/2002					Service verified from _____ to _____ from the Acquittance Rolls maintained in this office	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
Principal G.T.V.C. Khalabat	30/11/2002	Annual Increment		Principal G.T.V.C. Khalabat		Granted Moreover to BPS-2 to BPS-3 vide order Encl No. Dmt/ G.P.P. 32/270(104) dated 07-10-2003	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)						Granting Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)						Granting Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)	30/11/2003	Annual Increment		Principal G.T.V.C. Khalabat		Granting Principal Govt. Technical & Vocational Center (Boys) KTS Haripur	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	

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 P.ay 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
H/Supd 4/7/Clerk <u>B-05 (24100-100-510)</u>	Temp.	-	350/-	-	-	1 <sup>12</sup> / <sub>2005</sub>	<i>Jitendra</i>
<u>B-05</u> (2415-115-5865)	<i>Pay revised W.e.f 1-7-2005 Wide ratification no. FDC(PRC)1-1/2005 dated 9-7-2005</i>		<i>400/-</i>			<i>1 <sup>7</sup>/<sub>2005</sub></i>	<i>Jitendra</i>
			<i>4140/-</i>			<i>1 <sup>12</sup>/<sub>2005</sub></i>	<i>Jitendra</i>
<i>do</i>						<i>21-6-2006</i>	<i>Jitendra</i>

*PRINCIPAL*  
Govt Technical & Vocational  
(Bovs) KTS Haripur

9	10	11	12	13		Signature of head of the office or other attesting officer in attestation of columns 1 to 8	
				Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of head of the office or other attesting offic		
	Date of termination of appoint- ment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Natu- re and duration of leave taken	Period	Government to which debitable	Signature of head of the office or other attesting offic
Principal G.T.V.C. Khalabat		Annual Increment		Service verified from 1/12/2003 to 30/11/2004 from the Acquittance Rolls maintained in this office.	1/12/2003 to 30/11/2004		Principal
Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)				Service verified from 1/12/2003 to 30/11/2004 from the Acquittance Rolls maintained in this office.	1/12/2003 to 30/11/2004		Principal
Principal G.T.V.C. Khalabat		Annual Increment		Transferred to Govt College of Commerce Haripur vide Director Technical Edu and Manpower Trg, NUSTI Peshawar's Office order Encl No DTE/Admin			
Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)		Date of Receiving		Transfer/3237(1-4) dt: 07/6/06, and received from this centre W.E.F 20-6-2006 (AN)			
Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)		20-6-06 (AN)		Service verified from 1/12/2003 to 30/11/2004 from the Acquittance Rolls maintained in this office.	1/12/2003 to 30/11/2004		Principal Govt. Technical & Vocational Centre Khalabat Town ship (Haripur)
PRINCIPAL Govt. Degree College of Commerce Haripur (Hazara)		Date of Arrival 21-6-2006 (C.E.M)		Transfer from Govt. Technical and Vocational Centre Haripur. Vide Order No DTE/ADM/Transfer/3237(1-4)- dated 17-6-2006 and assumed as duty in this Institute on 21-6-2006 944-42 dt: 21-6-2006	1/12/2003 to 30/11/2004		Principal
PRINCIPAL Govt. Degree College of Commerce Haripur (Hazara)				944-42 dt: 21-6-2006			

PRINCIPAL  
Govt. Degree College of Commerce  
Haripur (Hazara)

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. 382 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
<u>BPS-65</u> <u>2400-115-5865</u>	—	—	625/-/m	—	—	F.I.D. 01-07-2007	T.R.D.
<u>—6—</u>	—	—	6940/-m	—	—	A.P.T. 01-07-2007	T.R.D.
<u>BPS-67</u> <u>2960-160-7760</u>	—	—	5020/-m	—	—	J.A.T. 01-07-2007	T.R.D.
<u>—Do—</u>	—	—	5880/-m	—	—	J.L.C. 01-07-2007	T.R.D.
<u>BPS-7</u> <u>3560-170-5220</u> <u>—Do—</u>	—	—	6190/-m	—	—	J.L.C. 01-07-2007	T.R.D.

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

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 debitable 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 debitable		
30/11/2006 Govt Degree College of Commerce Haripur (Hazara)	PRINCIPAL						Service period between 21-6-2001 to 20-3-2006 verified in the record maintained by this office
							Adjustment against the post of Senior Clerk (B-7) the post has down scaled from BRS-7 to BRS-5 vide modification to F.O/SO (CSR) 6/1/2007 dated (18-1-2007)
							Govt. Degree College of Commerce Haripur (Hazara) Pay Scale revised W.e.f. 01-7-2007 vide G.O.M.R. No. 1000 F.O/SO (CSR) 7-2-2007 dated 28-1-2007
							Govt. Degree College of Commerce Haripur (Hazara) Basic Pay increase and Allowance of civil Employment of Provincial Government Vid. Sicy/CE 480 dated 14-7-2008
							Transfer to Govt. Technical & Vocational Center (Boys) Haripur Vidi. Direction No. DGTE 4197/Adm/1/2008 dated 22-1-2008 and Transfer of KTS (Boys) Haripur to Govt. Technical & Vocational Center (Boys) Haripur w.e.f. 2-11-2008 from this college
							Govt. Degree & Management Sciences Haripur (Hazara)

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 emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
BPS-67 3540-190-9240			638/- 1/11			1/12 2008	7464
Junior Clerk BPS-7 3540-160-7740			5180/-			1/9 2007	7464
-11- Junior Clerk BPS-7 3530-190-9230			5340			1/12 2008	7464
-11-			6380/-			1/7 2008	7464
-11-			6570/-			1/12 2008	7464
-11-			6760/-			1/12 2009	7464
-11-			6950/-	PRINCIPAL Govt. Technical & Vocational Sectn. (Boys) KTS Hampur		1/12 2010	7464
Junior Clerk BPS-7 3540-320-15400			7100/-			1/7 2011	7464

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 debitable to another Government	
Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Annual increment	1. <i>Ram</i>	Transferred from Govt. College of Management Services Haripur vide DGTE/T/Recd of Admn/1830 (1-6) dt/23-6-2008 and assumed his duty as the Institor on 21-11-2008 (T.H.), O.D.N: 653-56 dated 11/2/08	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	3. <i>Ram</i>	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal Drawing & Disbursing Officer G.T.V.C. (W), Khatauli Haripur	Drawing & Disbursing Officer G.T.V.C. (W), Khatauli Haripur	2. <i>Ram</i>	By Seal received and one advance increment vide Notification No. FDCSR-1) 2-6/2008 dated 7-2-2008 & dated 29 July 2007.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Annual increment	3. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Annual increment	4. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Annual increment	5. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Annual increment	6. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal G.T.V.C. (W), K.T.S. Haripur	Annual increment	7. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal G.T.V.C. (W), K.T.S. Haripur	Annual increment	8. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
Principal G.T.V.C. (W), K.T.S. Haripur	Annual increment	9. <i>Ram</i>	Service verified from 1/12/10 to 30/11/11 from the Acquittance Rolls maintained in this office.	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur	Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur

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 annuity for pension under Art. 371 C. S. I.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Governor servant
Junior Clerk 5800-320-15400			Rs 11880/-			1 <sup>st</sup> Aug 2012	T. J. Patel
do			Rs 12200/-			1 <sup>st</sup> Dec 2012	M. Patel
do			Rs 12200/-			19 <sup>th</sup> Dec 2013	T. J. Patel
Revised Entries							
Junior Clerk (5800-320-15400)			Rs 12200/-			01 <sup>st</sup> Jan 2013	T. J. Patel
do - A/H			Rs 12200/-			30 <sup>th</sup> Dec 2013	T. J. Patel
Junior Clerk (B)			Rs 12200/-			1 <sup>st</sup> Jan 2013	T. J. Patel
<i>PRINCIPAL Govt Technical &amp; Vocational Center (Boys) KTS Hanur</i>							

10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of column 1 to 3	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	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 debitable to another Government		
			Period	Government to which debitable		
PRINCIPAL G.T.V.C (W) K.T.S. 2 Haripur		Annual Increment				Service Verified from 1/1/2011 to 30/11/2012 from the Acquittances Books maintained in this office.
PRINCIPAL G.T.V.C (W) K.T.S. 2 Haripur		Annual Increment				Principal G.T.V.C (W) K.T.S. 2 Haripur
						Transfer to Govt. College of Management Sciences, Haripur vide Office Order Endst. No. DGTE & MT/ Admin/ Transfer/ 776 (1-5) dated 29-1-2013 and relieved from duties 19-2-2013 (A-F)
		Date of Relieving.	01/03/2013 (A-N)			Principal Govt. Technical & Vocational Center for Women K.T.S. Haripur
						Transfer to Govt. College of Management Sciences, Haripur. vide Director General Technical Education & Manpower Training K.P.K. Peshawar. Office order Endst. No. DGTE & MT/ Admin/ Transfer/ 776 (A-S) Dated: 29-01-2013, and relieved from this Centre w.e.f. 01-03-2013 (A-N).
						Principal Govt. Technical & Vocational Center For Women K.T.S. Haripur
						Transfer from G.T.V.C (W) & G.T.V.C (B) vide D.O's. No. DS/ E&MT/ Admin/ Transfer/ 2044 (1-5) dt 13-3-2013 and relieved from duties w.e.f 30-3-2013 (A-N) vide No. G.T.V.C (W) /PE-20/31 (1-5) dt. 30-3-2013.
						Principal Govt. Technical & Vocational Center for Women K.T.S. Haripur
						Transferred from G.T.V.C (W) Chakwal to G.T.V.C (B) Khatare vide No. DS/TE & MT/ Admin/ Transfer/ 2044 (1-5) dt 13-3-2013 and taken on strength w.e.f 1-4-2013 vide No. G.T.V.C (B)/38 (1-5) dt 1-4-2013
INCIPAL Tech & Vocational Balabat, Haripur						

*H. Jones*  
**PRINCIPAL**  
Govt: Tech & Vocational  
Cent. H.S.

(For use in Police and other similar Departments).

## RECORD OF POSTINGS.

District and post	No. of District Order	Date	District and post.	No. of District Order	Date
Junior Clerk (B-7) 5800-320-15400		1/12 2013	12520/PM	764	
do.		16/12 2013	12520/PM	765	
BPS-II Junior Clerk (6600-460-20400)	Pre Ward-		12520 660 13640	905 2014 (F-N)	
do.			13500/- PM	1/12 2014 (F-N)	
Scale Revised BPS-II (8535-595-26385) W.e.f - 01-07-2015.			Rs: 17465/-	01/07 2015 (F-N)	
BPS-II (8535-595-26385)			PRINCIPAL Govt Technical & Vocational Central Boys' P.T.S Harnau. do.	01/12 2015 (F-N)	

(For use in Police and other similar Departments).

## RECORD OF POSTINGS.

District and post	No. of District Order	Date	District and post	No. of District Order	Date
Annual increment			Transferred from GTEC Kherlaonat to GEMS, Haripur via te dtls. order No-DGTE&MT/Admn/Transfer (1-6)/6774 dt. 26/11/2013 and received from Service w.e.f 30/11/2013 vide No-GTEC/KTS/PF-37/425(1-6) dt 14/12/2013		
Principal G.C.M.S Haripur (Hazara)			Service period from 1-12-12 to 30.11.13, verified from the record maintained by this office		
Principal G.C.M.S Haripur (Hazara)			Transfer from GTEC, Uts to GCMs, Haripur via Dhar order No-DGTE&MT/Admn Transfer (1-6)/6774 dt 26/11/13 and received order No-HA/GCMs/PF/3948 dt 30/11/13 w.e.f this office order No-HA/GCMs/PF/3948 dt 17/12/13 on strength of F.N.		
Principal Government College of Management Sciences Haripur (Hazara)			Service period from 01-12-2013 to 30-11-2014 verified from the record maintained by this office		
Principal Government College of Management Sciences Haripur (Hazara)			Principal Government College of Management Sciences Haripur (Hazara)		
Principal Government College of Management Sciences Haripur (Hazara)			Principal Government College of Management Sciences Haripur (Hazara)		
Principal Government College of Management Sciences Haripur (Hazara)			Principal Govt Technical & Vocational Center (Boys) KTS Haripur		
Principal Government College of Management Sciences Haripur (Hazara)			Service period from 01-12-2014 to 30-11-2015 verified from the record maintained by this office		
Principal Government College of Management Sciences Haripur (Hazara)			Principal Government College of Management Sciences Haripur (Hazara)		

## RECORD OF POSTINGS

District and Post	No. of District Order	Date	District and post	No. of District Order	Date
BPS-11 (10510-740-32710) JTC			Revision of Basicie Salaries 2016.		
do		01/07/2016 (F.N)	Rs: 22350/- P.M service period from 01-7-2016 to 30-11-16, verified from the record maintained by this office	22350/- P.M PRINCIPAL	7/16/16
do		01/12/2016 (F.N)	23090/- P.M service period from 01-7-16 to 30-11-16, verified from the record maintained by this office	23090/- P.M PRINCIPAL	7/16/16
do		09/01/2017	Service period from 1-1-2016 to 29-12-2016, verified from the record maintained by this office	23090/- P.M PRINCIPAL	7/16/16
do			Retired from Service after completed 60 year Age w.e.f 09-01-2017 (A.N) Vice Director General of Commerce Education & Management Sciences K.P. Pashawri Endst: No. DGCE & MS/Admn/1-1(XVI)/513 dated 10-10-16	23090/- P.M PRINCIPAL	7/16/16
do			Leave application in encashment of 365 days. Vice Director Commerce Education & Management Sciences Govt Technical Education Center (ETEC) K.P. Pashawri Endst: No DGCE & MS/Admn/1-1(XVI)/513 dated 04-10-2016	23090/- P.M PRINCIPAL	7/16/16

27

PROVINCIAL TRAINING BOARD  
JEHANGIRABAD, P.O.BOX 825  
UNIVERSITY ROAD, PESHAWAR

Q R D E R

SUBJECT:-

APPOINTMENT OF WORKSHOP ATTENDANT (BPS-1)  
IN OCCUPATIONAL REHABILITATION CENTRE, KHALABAT.

Mohammad Iqbal S/O Abdus Salam, is appointed on the post of Workshop Attendant (BPS-1) 440-10-640 plus usual allowances admissible under the rules at Occupational Rehabilitation Centre, Khalabat against the vacant post of Workshop Attendant.

2- His appointment is made on purely temporary basis terminable at any time without notice and without assigning any reason. His appointment is further subject to (i) Medical Fitness and (ii) Verification of his character and antecedents by Police Department.

3- The establishment charges on account of his appointment will be borne by the Provincial Training Board, Peshawar.

Authority:- Approved vide on application dated 18-04-1985.

Secretary,  
Provincial Training Board.

Endst: No. PTB/144/Eatt//b 37  
Copy to :-

Dated 18th April, 1985.

1. The Principal, Occupational Rehabilitation Centre, Khalabat with the request to take him on strength and submit his arrival report alongwith medical fitness certificate for record in this office.  
2. The Assistant Director (Accounts) Provincial Training Board for information & necessary action.  
3. Mohammad Iqbal S/O Abdus Salam C/O Principal, Occupational Rehabilitation Centre, Khalabat for compliance.  
4. Personal file of individuals concerned.  
5. Office order file.  
6. Office Copy.

*After*  
*Principal*  
Govt Technical & Vocational  
Centres (Boys) KTS Haripur

( Haji Malal Khan )  
Asstt: Director (Admn)  
Provincial Training Board,  
N.W.F.P. Peshawar.

W.E.D. 20/4/85

**PRINCIPAL**  
Govt Technical & Vocational  
Center (Boys) K.S.Hatipur

**PRINCIPAL**

• 100 NOTAM SCHEDULES FOR APPROXIMATE AND APPROXIMATE IDEAS  
• 1000 - 1000 APPROXIMATE IDEAS

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08/10/2014 - 12:33PM \* 3447590000

• 1980-1981 學年

10. *Leucosia* (L.) *leucostoma* (L.) *leucostoma* (L.) *leucostoma* (L.)

- 140-20 - FORTRESS UTAH  
RECEIVED AND INDEXED / DIRECTOR INFORMATION SEC

THE FRENCH CROWN AND THE KING  
SAY THIS TO THE FRENCH PEOPLE  
WE ARE GOING TO GET A NEW KING  
WE ARE GOING TO GET A NEW KING

Today nothing

87

Annexure B

29

12

Government of S.I.L.P.A.  
Directorate of Manpower & Training,  
Occupational Rehabilitation Training Centre,  
Khulabat (Haripur)

RECORDED

Consequent upon his transfer from Apprenticeship  
Training Centre, Haripur vide Directorate of Manpower and Training  
Circular, order bearing endt. No. DPT/H-166/760, dated 14-2-1987,  
Mr. Monamod Iqbal, workshop attendant has been reported for  
duty at this Institute on 21-2-1987 (F.Soon) and taken on stren-  
gth of this Institute with effect from the above date against  
the post of Naib Asid vacated by transfer of Mr. Asael-Ur-Rahman.

(Mawab Ali Tariq )  
Principal,  
Khulabat.

Inst. No. 480/4-Set/225-29

Dated. 21-2-1987.

Copy forwarded to:-

1. The Director, Manpower and Training M.D.,  
Gallibabad C.C. Box. No. 225 University Road,  
Lahore.
2. The Principal, Apprenticeship Training Centre,  
Dera Ismail Khan No. 164.

The District Accounts Officer, Abbottabad.

The Accountant, Occupational Rehabilitation

Training Centre, Khulabat (Haripur)

Personal file of the official concerned.

(Mawab Ali Tariq )  
Principal,  
Khulabat.

RECORDED

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

30

30

GOVERNMENT OF N.W.F.P.,  
DIRECTORATE OF MANPOWER & TRAINING  
OCCUPATIONAL REHABILITATION TRAINING CENTRE  
KHALABAT (HARIPUR)

Dated. 10.9.1991.  
No. ORG/37-PF, 1090

To,

The Director,  
Manpower & Training NWFP,  
Benevolent Fund Building,  
Hall Nos. 210-211,  
Saddar Road, Peshawar.

Sub:- ORDER OF CHANGE OF CADRE/ADJUSTMENT IN THE POST OF NAIB QASID.

As per seniority list of Naib Qasid Sr. No. 41 vide Directorate's letter Endst. No. DMT/4-13/141, dated 9.1.1989, Mr. Mohammad Iqbal, Workshop Attendent, who was transferred from Technical Training Centre, Mardan vide Dte's letter No. DMT/M-166/780, dated 14.2.1987 against the post of Naib Qasid (B-01) and was taken on the strength of this training centre with effect from 21.2.1987 (FN)(the date of his arrival) was shown adjusted as Naib Qasid on 24.2.1987, whereas he is working as Workshop Attendent against the post of Naib Qasid since his transfer from Technical Training Centre, Mardan up till now.

It is therefore requested that orders for adjustment/change of cadre in the post of Naib Qasid with effect from 14.2.1987 in favour of Mr. Mohammad Iqbal, presently working as Workshop Attendent, may please be issued for drawing his salary etc. of the post of Naib Qasid accordingly.

His application for payment of dues of the post of Naib Qasid is attached herewith in original for perusal please.

Encl: (1)

Att m/s

( RIASAT KHAN )  
PRINCIPAL,  
KHALABAT.

OMTC

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

31

(33)

Government of N.W.F.P.  
Directorate of Manpower & Training  
Benevolent Fund Building Hall Nos.  
210-11 Saddar Road, Peshawar, Cantt:

ORDER

Mr. Mohammad Iqbal workshop attendant who was transferred to Occupational Rehabilitation Centre, Khalabat against the post of Naib Qasid shall be deemed to have been adjusted against the said post w.e.f. 21st February, 1987, and as such he is entitled to pay and allowances attached to the post of Naib Qasid.

Director  
Manpower and Training  
N.W.F.P.

Dated, 3rd October, 1999  
Endst: No. DMT/1-4-115/7975-79

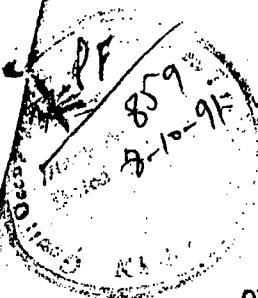
Copy to:-

- 1) The District Account Officer, Abbottabad.
- 2) The Principal Occupational Rehabilitation Centre, Khalabat.
- 3) Mr. Mohammad Iqbal, Naib Qasid Occupational Rehabilitation Centre, Khalabat.
- 4) Office copy.

H/C  
Attain  
Copy 2  
89x  
  
(Hussain Gul)  
ASSTT: DIRECTOR ADNN:

PRINCIPAL  
Govt Technical & Vocational  
Centre (Boys) KTS Haripur

32



(35)

Government of N.W.F.P.  
Directorate of Manpower & Training  
Benevolent Fund Building Hall Nos.  
210-11 Saddar Road, Peshawar Cantt:

ORDER

Mr. Mohammad Iqbal workshop attendant who was transferred to Occupational Rehabilitation Centre, Khalabat against the post of Naib Qasid shall be deemed to have been adjusted against the said post w.e.f. 21st February, 1987, and as such he is entitled to pay and allowances attached to the post of Naib Qasid.

Director  
Manpower and Training  
N.W.F.P.

Endat: No. DMT/1-4-115/7076-78

Dated, 3rd October, 1991.

Copy to:-

- 1) The District Account Officer, Abbottabad.
- 2) The Principal Occupational Rehabilitation Centre, Khalabat.
- 3) Mr. Mohammad Iqbal, Naib Qasid Occupational Rehabilitation Centre, Khalabat.
- 4) Office copy.

HMC  
Copy  
6-8-91  
Affacted  
HS  
  
PRINCIPAL  
Govt. Higher & Vocational  
Education (Boys) KTS Haripur  
(Hussain Gul)  
ASSTT: DIRECTOR (ADMN:)

33

38

GOVERNMENT OF N.W.F.P.  
DIRECTORATE OF MANPOWER & TRAINING  
BENEVOLENT FUND BUILDING HALL NO:  
210-11, SADDAR ROAD PESHAWAR CAVI

No. DMT/4-2/ 736

Dated 27th January, 1992.

40

2-2-92

To,

Mr. Ahmad Hussain,  
Private Secretary to Speaker,  
National Assembly of Pakistan,  
Islamabad.

Subject:- APPLICATION FOR THE POST OF JUNIOR CLERK.

I am directed to refer to your letter No. 1-1/92-S, dated 11-1-1992 and to state that at present we don't have any vacancy of Junior Clerk to accommodate Mr. Muhammad Iqbal Naib Qasid ORTC, Khalabat. Moreover, the 25% quota of Junior Clerk is meant for promotion on the basis of seniority cum fitness from amongst the holder of the posts of Daftari, Naib Qasid and Driver with Matriculation and speed of 30 words per minute of typing with at least 2 years service as such. Hence Mr. Muhammad Iqbal is junior to his other counterparts in the cadre of Naib Qasid. However, when ever vacancy falls vacant in the share of Naib Qasids, his case will be considered on the basis of merit.

(HUSSAIN GUL)  
Assistant Director(Admn)

.....  
Endst: No. DMT/4-2/ 736 - 37

Dated 27th Jan: 1992.

Copy to:-

Mr. Muhammad Iqbal, Naib Qasid ORTC Khalabat.

Assistant Director(Admn)

PRINCIPAL  
Govt Technical & Vocational  
College/Boys/KTS Haripur

34

D.F.A..

No. ORC/37-PF/

1991.

To,

The Director,  
Manpower & Training, NWFP,  
210-211-Benevolent Fund Building,  
Saddar Road, Peshawar Cantt.

Subject:

ORDER FOR CHANGE OF CADRE/ADJUSTMENT IN THE POST  
OF NAIB QASID.

As per Seniority list of Naib Qasid Sr. No. 41 vide  
Directorate's letter Enclst. No.DMT/4-18/141, dated 9-1-1989, Mr. Mohammad Iqbal,  
Workshop Attendant, who was transferred from ATC, Mardan vide Directorate's  
letter No.DMT/M-166/780, dated 14-2-1987 against the post of Naib Qasid B-1  
and was taken on the strength of this Training Centre with effect from  
21-2-1987 (FN) (the date of his arrival) was shown adjusted as Naib Qasid  
on 14-2-1987. Where as he is working as Workshop Attendant against the  
post of Naib Qasid since his transfer from ATC, Mardan up till now.

It is therefore requested that order for adjustment  
/change of cadre in the post of Naib Qasid w.e.f. from 14-2-1987 in favour  
of Mohammad Iqbal, presently working as Workshop Attendant, may kindly  
be issued for drawing his salary etc. of the post of Naib Qasid accordingly.

Encl:One.

His application for payment of dues of the post of Naib-

Qasid is attached herewith in original for perusal, please.

PRINCIPAL

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

Annexure "C"

GOVERNMENT OF N.W.F.P.  
 INDUSTRIES, COMMERCE, MINERAL DEVELOPMENT,  
 LABOUR AND TRANSPORT DEPARTMENT.

Dated Peshawar, the April 3, 1990.

NOTIFICATION.

No.SOI(IND)8-4/88.Vol.II/4608. In pursuance of the provision contained in sub-rule(2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules 1989, and in consultation with the Services and General Administration Department and the Finance Department, the Industries, Commerce, Mineral Development, Labour and Transport Department hereby lays down the method of recruitment, qualifications and other conditions specified in columns 3 to 6 of the Appendix to this Notification, which shall be applicable to the posts in the Directorate of Manpower and Training, North-West Frontier Province, specified in Column 2 of the said Appendix.

2. In view of the newly framed Service Recruitment Rules for the Directorate of Manpower and Training NWFP, Peshawar, in the Labour Department (Recruitment and Appointment) Rules 1982 amended in 1984 entries appearing at different Serial Nos. regarding Directorate of Manpower and Training Staff shall be deemed to have been deleted.

Secretary to Govt. of N.W.F.P.  
 Industries, Commerce, Mineral Development,  
 Labour and Transport Department.

Endst.No.SOI(IND)8-4/88/Vol.II/4609-4758

Dated 3/4/1990.

Copy forwarded to:-

1. All Administrative Secretaries to Govt. of NWFP, and its attached departments.
2. Secretary to Governor NWFP, Peshawar.
3. Secretary to Chief Minister NWFP, Peshawar.
4. All Commissioners of Divisions in NWFP.
5. All Heads of Attached Departments in NWFP.
6. All District & Session Judges in NWFP.
7. Registrar, Peshawar High Court, Peshawar.
8. All Dy. Commissioners/Political Agents in NWFP.
9. Secretary, Board of Revenue, NWFP, Peshawar.
10. Secretary, NWFP Public Service Commission, Peshawar.
11. Registrar, Service Tribunal Peshawar.
12. The Director, Manpower and Training, NWFP, Peshawar.
13. Extra-Ordinary Gazette. He is requested to supply 25 copies of this Gazette Notice to this Department.

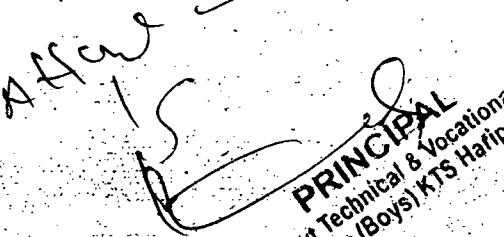
R.A.C  
 PRINCIPAL  
 Govt. Technical & Vocational  
 (Boys) Krs Haripar

Junaid

Sd/-

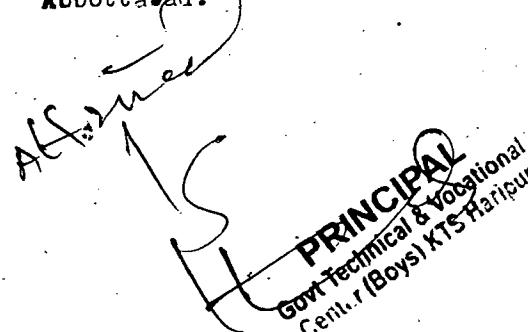
1	2	3	4	5	6
16.	Statistical Assistant/ Manpower Survey Officer (EPS-11)	Bachelor's Degree (2nd Division) with Statistics as one of the subjects from a recognised University.	13-25 Years	By initial recruitment.	
17.	Librarian (EPS-11).	Bachelor's Degree from a recognised University. Preference will be given to the holders of Diploma in Library Science from a recognised Institute.	21-28 Years	By initial recruitment.	
18.	Accountant (EPS-8).			By Promotion on the basis of seniority- cum-fitness from amongst holders of the posts of Senior Clerk and Storekeeper with at-least 3 years' service as such.	
19.	Senior Clerk (EPS-7).			By promotion on the basis of seniority-cum- fitness from amongst holders of the posts of Junior Clerk and Hostel Superintendent with at-least 2 years' service as such.	
20.	Store Keeper (EPS-6).			By promotion on the basis of seniority-cum- fitness from amongst holders of the posts of Junior Clerk and Hostel Superintendent with at-least 2 years' service as such.	
21.	Junior Clerk (EPS-5).	a) Matriculation or equivalent qualification from a recon- gnised Board; and  b) A speed of 30 words per minute in typing.	Matriculation 18-25 or equivalent years qualification from a recognised Board.	a) 25% by promotion, on the basis of seniority- cum-fitness from amongst holders of the posts of Daftari, Naib Qasid and Driver with at- least 2 years' service as such; and.  b) 75% by initial recruitment.	

.....page-8

*Afford*  
  
**PRINCIPAL**  
 Govt Technical & Vocational  
 Center (Boys) KTS Haripur

**SENIORITY LIST OF JUNIOR CLERK/HOSTEL SUPERINTENDENT  
OF THE DIRECTORATE OF MANPOWER AND TRAINING N.W.F.P.**

Sr. No.	Name of official with academic qualification.	Date of birth and domicile.	Date of 1st entry into Govt:service.	Regular appointment/promotion to the present post. Date Method of recruitment/appointment.	Remarks.	
1	2	3	4	5	6	7
1.	Mr.Yar Muhammad, J/Clerk (Matric.)	<u>28-03-1966</u> Kohat.	2-5-1984	2-5-1984 By initial appointment.		
2.	Mr.Maula Dad, Hostel Supdt: (Matric.).	<u>3-04-1964</u> Peshawar.	1-1-1986	1-1-1986 By initial appointment. Appointment in PTB on 30.3.1983		
3.	Mr.Mazhar Ahmad J/Clerk (Matric.).	<u>4-05-1964</u> Peshawar.	1-1-1986	1-1-1986 By initial appointment. Appointment in PTB on 18.3.1983		
4.	Mr.Nisar Ahmad, J/Clerk (Matric.).	<u>1-6-1960</u> Peshawar.	1-1-1986	1-1-1986 By initial appointment. Appointed as Stenotypist in project on adhoc basis.		
5.	Mr.Sajid Hussain J/Clerk (Matric.).	<u>15-12-1964</u> Peshawar.	1-1-1986	1-1-1986 By initial appointment. Appointed in PTE on 2-09-1984.		
6.	Mr.Yaqoob Khan, J/Clerk (Matric.).	<u>17-03-1961</u> Peshawar.	16-3-1986	16-3-1986 By initial appointment. Appointed as Computer Operator.		
7.	Miss Syeda Shama Akhtar J/Clerk (F.Sc.).	<u>9-4-1964</u> Abbottabad.	1-4-1986	1-4-1986 By initial appointment. Appointed as Asstt:on adhoc basis.		

Affirmed  

**PRINCIPAL**  
 Govt Technical & Vocational  
 Centr. (Boys) KTS Haripur

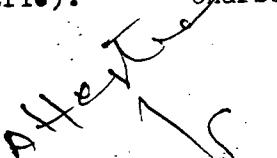
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(1)	(2)	(3)	(4)	(5)	(6)	(7)
8.	Mr.Shaukat Mehmood, J/Clerk (Matric).	<u>9-10-1965</u> Kohat.	3-6-1986	3-6-1986	By initial appointment.	-
9.	Mr.Muhammad Tufail, J/Clerk (B.A.).	<u>11-1-1965</u> Peshawar.	23-09-1987	23-09-1987	By initial appointment.	-
10.	Mr.Mubarik Ahmad, J/Clerk (F.A.).	<u>4-12-1961</u> Charsadda	29-11-1987	29-11-1987	By initial appointment.	-
11.	Mr.Shamsul Islam, J/Clerk (Matric).	<u>16-04-1968</u> Karak.	19-01-1988	19-01-1988	By initial appointment.	-
12.	Mr.Kiramatullah J/Clerk M.A.(Pushto).	<u>2-6-1969</u> Peshawar.	14-04-1988	14-04-1988	By initial appointment.	Appointed as Stenotypist adhoc basis.
13.	Mrs Naila Shahen J/Clerk.(FA).	<u>10-11-1964</u> Peshawar.	25-04-1988	25-4-1988	By initial appointment.	-
14.	Mr.Gul Badshah J/Clerk B.A.	<u>1-09-1966</u> Peshawar	29-05-1988	29-05-1988	By initial appointment.	-
15.	Mr.Tanweer Khan J/Clerk Matric.	<u>15-4-1969</u> Abbottabad	10-08-1988	10-08-1988	By initial appointment.	-
16.	Mr.Hidayat Ullah J/Clerk M.A.	<u>4-3-1966</u> Peshawar	1-2-1990	1-2-1990	By initial appointment.	-
17.	Mr.Mujeeb-ur-Rehman J/Clerk (Matric).	<u>D.I.Khan.</u>	1-2-1990	1-2-1990	By initial appointment.	-

Contd....P/3

*Atta ur Rehman*  
**PRINCIPAL**  
 Govt Technical & Vocational  
 Center (Boys) KTS Haripur

(1)	(2)	(3)	(4)	(5)	(6)	(7)
18.	Mrs.Robina J/Clerk Matric.	<u>27-4-1964</u> Peshawar.	1-2-1990	1-2-1990	By initial appointment.	
19.	Syed Talawat Shah, J/Clerk (Matric).	<u>5-3-1970</u> Mardan.	1-2-1990	1-2-1990	By initial appointment.	
20.	Mr.Sher Zamin J/Clerk (Matric.).	<u>14-4-1969</u> Mardan.	1-2-1990	1-2-1990	By initial appointment.	
21.	Mr.Tjaz Ahmad,J/Clerk (Matric.).	<u>2-2-1970</u> Haripur.	1-2-1990	1-2-1990	By initial appointment.	
22.	Mr.Gul Bashar J/Clerk (Matric.).	<u>12-2-1965</u> Peshawar.	1-2-1990	1-2-1990	By initial appointment.	
23.	Mr.Javeed J/Clerk Matric.	<u>1-1-1960</u> Swat.	1-7-1991	1-7-1991	By initial appointment.	
24.	Mr.Sher Nawaz Khan, J/Clerk (Matric.).	<u>1-6-1964</u> Bannu.	1-7-1991	1-7-1991	By initial appointment.	
25.	Mr.Muhammad Ajmal, J/Clerk (Matric.).	<u>7-5-1967</u> Lakki Marwat.	1-9-1991	1-9-1991	By initial appointment.	
26.	Mr.Israrullah J/Clerk (Matric.).	<u>11-4-1964</u> Peshawar.	24-5-1988	22-3-1992	By initial appointment.	
27.	Mr.Zafar Ullah J/Clerk (Matric.).	<u>16-3-1966</u> Peshawar.	9-7-1988	22-3-1992	By initial appointment.	
28.	Mr.Fazal Muhammad J/Clerk (Matric.).	<u>16-3-1962</u> Charsadda.	9-8-1988	22-3-1992	By initial appointment.	


**PRINCIPAL**  
 Govt Technical & Vocational  
 Center (Boys) KTS Haripur

(1)	(2)	(3)	(4)	(5)	(6)	(7)
29.	Mr.Mustafa Kamal J/Clerk (Matric).	1-1-1963 Swabi.	21-8-1988	22-3-1992	By initial appointment.	
30.	Mr.Aurang Zeb, J/Clerk(Matric).	1-3-1963 D.I.Khan.	21-8-1988	22-3-1992	By initial appointment.	
31.	Mr.Muhammad Quresh J/Clerk (Matric).	1-3-1969 Charsadda	1-9-1988	22-3-1992	By initial appointment.	
32.	Mr.Azmat Din J/Clerk (Matric).		8-9-1988	22-3-1992	By initial appointment.	
33.	Mr.Jehan Zeb J/Clerk (Matric).	1-2-1966 Peshawar.	14-9-1988	22-3-1992	By initial appointment.	
34.	Mr.Nazir Hussain J/Clerk (Matric).	3-4-1965 Haripur.	15-9-1988	22-3-1992	By initial appointment.	
35.	Mr.Bah-rul-Amin, J/Clerk (Matric).	9-6-1965 Charsadda.	1-10-1988	22-3-1992	By initial appointment.	
36.	Mr.Mir Ajab J/Clerk (Matric).	25-9-1967 Chitral.	22-10-1988	22-3-1992	By initial appointment.	
37.	Mr.Afzal Malik J/Clerk (Matric).	13-2-1963 Chitral.	3-11-1988	22-3-1992	By initial appointment.	
38.	Mr.Muhammad Laiq J/Clerk (Matric).	8-5-1965 Swat.	8-11-1988	22-3-1992	By initial appointment.	

  
**PRINCIPAL**  
 Govt Technical & Vocational  
 Center (Boys) KTS Haripur

(1)	(2)	(3)	(4)	(5)	(6)	(7)
33.	Mr.Nadir Khan, J/Clerk (Matric).	1-4-1963 Mohmand Agency.	1-8-1989	22-3-1992	By initial appointment.	
40.	Mr.Muhammad Ilyas Hostel Supdt:Matric.	10-4-1970 Peshawar.	31-8-1989	22-3-1992	By initial appointment.	
41.	Mr.Abdus Salam, J/Clerk (Matric).	27-9-1970 D.I.Khan.	2-9-1989	22-3-1992	By initial appointment.	
42.	Mr.Saeed-ur-Rehman, J/Clerk (Matric).	15-3-1970 Charsadda.	14-9-1989	22-3-1992	By initial appointment.	
43.	Mr.Muhammad Ilyas, J/Clerk	15-2-1968 Peshawar	16-9-1989	22-3-1992	By initial appointment.	
44.	Mr.Muhammad Pervez J/Clerk (Matric).	12-1-1965 Manshera.	18-9-1989	22-3-1992	By initial appointment.	
45.	Mr.Muhammad Iqbal J/Clerk (Matric).	5-5-1970 Lakki.	20-9-1989	22-3-1992	By initial appointment.	
46.	Mr.Fayaz Khan, J/Clerk (Matric).	2-5-1969 Peshawar.	1-10-1989	22-3-1992	By initial appointment.	
47.	Mr.Muhammad Aslam, J/Clerk (Matric).	10-1-1971 Lakki.	7-10-1989	22-3-1992	By initial appointment.	

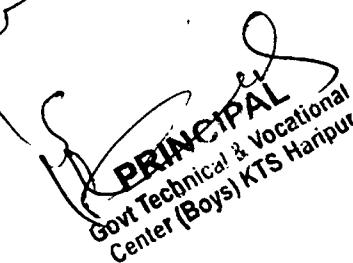
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PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

(1)	(2)	(3)	(4)	(5)	(6)	(7)
4b.	Mr.Muhammad Nazir J/Clerk (Matric).	20-4-1967 Abbottabad.	20-3-1990	22-3-1992	By initial appointment.	-
49.	Mr.Khalid Umar Hamish J/Clerk (Matric).	12-3-1966 Karak.	28-8-1990	22-3-1992	By initial appointment.	-
50.	Mr.Sohail Ahmad J/Clerk (Matric).	20-3-1970 Mardan.	1-9-1990	22-3-1992	By initial appointment.	-
51.	Mr.Abdul Khaliq J/Clerk (Matric).	5-5-1971 Haripur.	1-9-1990	22-3-1992	By initial appointment.	-
52.	Mr.Munawar Shah J/Clerk (Matric). F.A :	10-4-1967 Swat.	8-9-1990	22-3-1992	By initial appointment.	-
53.	Mr.Gul Sarwar J/Clerk (Matric).	2-1-1970 Tank.	17-9-1990	22-3-1992	By initial appointment.	-
54.	Mr.Bakht Zamin, J/Clerk (Matric).	6-12-1955 Swat.	4-12-1984	21-10-1992	By initial appointment.	-
55.	Mr.Hamid ur Rehman, J/Clerk (Matric).	1-3-1963 Chitral.	4-11-1988	15-2-1995	By initial appointment.	-
56.	Mr.Nazir Ahmad, J/Clerk (F.A.).	19-4-1969 Abbottabad.	1-1-1991	15-2-1995	By initial appointment.	-

*Attached*

PRINCIPAL  
Govt Technical & Vocational  
Center (Boys) KTS Haripur

(1)	(2)	(3)	(4)	(5)	(6)	(7)
57.	Mr.Khurshid Khan, J/Clerk (F.A.).	1-4-1968 Bannu.	8-1-1991	15-2-1995	By initial appointment. -	
58.	Mr.Siraj Muhammad J/Clerk (F.A.).	22-7-1972 Swabi.	10-1-1991	15-2-1995	By initial appointment. -	
59.	Mr.Aslam Khan, J/Clerk (Matric).	13-3-1966 Lakki.	27-1-1991	15-2-1995	By initial appointment. -	
60.	Mr.Nadir Khan, J/Clerk (Matric).	4-3-1970 Lakki.	9-2-1991	15-2-1995	By initial appointment. -	
61.	Mr.Qasim Khan, J/Clerk(Matric).	15-6-1971 Peshawar.	10-4-1991	15-2-1995	By initial appointment. -	
62.	Mr.Inam Ullah, J/Clerk (Matric).	1-9-1972 Lakki.	22-4-1991	15-2-1995	By initial appointment. -	
63.	Mr.Shafqat Ullah Khan, J/Clerk (Matric).	30-4-1964 Lakki.	1-7-1991	15-2-1995	By initial appointment. -	
64.	Mr.Fazle Ihsan, J/Clerk (F.A.).	31-1-1968 Swabi.	14-7-1991	15-2-1995	By initial appointment. -	
65.	Mr.Khushdil Khan, J/Clerk Matric.	18-9-1962 Bannu.	24-8-1991	15-2-1995	By initial appointment. -	

Attest  
  
 PRINCIPAL  
 Govt Technical & Vocational  
 Center (Boys) KTS Haripur

(1)	(2)	(3)	(4)	(5)	(6)	(7)
66.	Mr.Wasim Ashraf J/Clerk (F.A.).	<u>3-4-1968</u> Mansehra.	28-8-1991	15-2-1995	By initial appointment.	-
67.	Mr.Shaukat Zardad, J/Clerk (Matric).	<u>1-5-1970</u> Mansehra.	28-8-1991	15-2-1995	By initial appointment.	-
68.	Mr.Hazrat Ullah, J/Clerk (Matric).	<u>2-2-1969</u> Karak.	11-11-1991	15-2-1995	By initial appointment.	-
39.	Mr.Muhammad Ibrahim Gul, Junior Clerk (Matric).	<u>7-1-1967</u> Swat.	14-1-1992	15-2-1995	By initial appointment.	-
70.	Mr.Sultan Shah, J/Clerk (Metric).	<u>15-4-1970</u> Peshawar.	19-3-1992	15-2-1995	By initial appointment.	-
71.	Miss.Nooreen Kiyani, Junior Clerk (F.A.).	<u>1-6-1968</u> Peshawar.	26-4-1992	15-2-1995	By initial appointment.	-
72.	Mr.Gul Shad, J/Clerk (Matric).	<u>28-12-1970</u> Peshawar.	30-4-1992	15-2-1995	By initial appointment.	-
73.	Mr.Sajid Majeed, J/Clerk (Matric).	<u>18-2-1968</u> D.I.Khan.	19-8-1992	15-2-1995	By initial appointment.	-
74.	Mr.Nadir Khan, Junior Clerk(Matric).	<u>10-1-1963</u> Lakki.	23-8-1992	15-2-1995	By initial appointment.	-
75.	Mr.Umar Gul, J/Clerk (Metric).	<u>6-9-1968</u> Peshawar.	15-9-1992	15-2-1995	By initial appointment.	-

Attire  
PRINCIPAL  
Sohail Technical & Vocational  
Center (Boys) K/T/S DPTM

(1)	(2)	(3)	(4)	(5)	(6)	(7)
76.	Mr.Muhammad Qasim, J/Clerk (F.A.).	<u>2-7-1968</u> Lakki.	1-2-1993	15-2-1995	By initial appointment.	-
77.	Mr.Shah Wali Khan, J/Clerk (Matric.).	<u>14-4-1972</u> Charsadda.	21-4-1993	15-2-1995	By initial appointment.	-
78.	Mr.Ishfaq Hussain, Junior Clerk(Matric).	<u>4-3-1967</u> Mansehra.	23-8-1993	15-2-1995	By initial appointment.	-
79.	Mr.Ghulam Mustafa, Haider J/Clerk(Matric).	<u>17-4-1972</u> Charsadda.	8-9-1993	15-2-1995	By initial appointment.	-
80.	Mr.Abdul Hakim, J/Clerk (Matric).	<u>10-1-1971</u> Karak.	19-9-1993	15-2-1995	By initial appointment.	-
81.	Mr.Shaukat Ullah J/Clerk (Matric).	<u>1-10-1971</u> D.I.Khan.	2-10-1993	15-2-1995	By initial appointment.	-
82.	Mr.Abdul Qadir, J/Clerk	<u>24-12-1964</u> Peshawar.	26-2-1994	15-2-1995	By initial appointment.	-
83.	Mr.Ayan Shah, Junior Clerk Matric.	<u>14-2-1975</u> Peshawar.	8-3-1994	15-2-1995	By initial appointment.	-
84.	Mr.Muhammad Shuaib J/Clerk F.A.	<u>5-5-1973</u> Mohmand Agency.	4-5-1994	15-2-1995	By initial appointment.	-

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(1)	(2)	(3)	(4)	(5)	(6)	(7)
85.	Abu-Obaida Rehat Imam J/Clerk Matic.	10-4-1973 Nowshera.	5-5-1994	15-2-1995	By initial appointment.	-
86.	Mr.Zahir Shah, Junior Clerk F.A.	15-12-1971 Mardan.	1-7-1994	15-2-1995	By initial appointment.	-
87.	Mr.Munir Khan, Junior Clerk Matic.	17-11-1975 Peshawar.	7-5-1994	15-2-1995	By initial appointment.	-

Noted

1- ~~✓~~

After

  
**PRINCIPAL**  
 Govt Technical & Vocational  
 Center (Boys) KTS Haripur

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

Muhammad Iqbal

(Petitioner)

Versus

Government of Khyber Pakhtunkhwa & Others

(Respondent)

**Application for condoning the delay**

Respectfully Sheweth;

The petitioner humbly submits as under;

1. That the contents of Main appeal may kindly be considered as an integral Part of this Application.
2. That the Petitioner is just a matriculate and had no knowledge of limitation laws of Pakistan. The Maxim "Ignorance of Law is no Excuse" cannot be made practically applicable in Pakistan because Pakistan is an under developed country and most of the population of this Country is living under poverty line and under these circumstances a citizen's life revolves around the phenomena of earning upright bread and butter for him and his family as the burden of providing food, shelter, bread & butter, education of children, marriage of daughters etc lies upon his shoulders and in these circumstances, he has not enough time to focus on his rights. The same case was and still persist with the petitioner. The petitioner has served the institution for 32 years and in this period, the plaintiff was burdened with alone to earn bread and butter for his family (Including father, mother and unemployed brothers), education of children, marriage of three daughters etc and in these circumstances how it is possible that petitioner should update about the knowledge of existing law of limitation. The petitioner was unaware of injustice done to him until a relative who is law graduate informed him after perusing the documents about injustice done to him. (Affidavit is attached)
3. That since the law of limitation is inconsistent with the injunction of Islam and as per provisions of Constitution of Islamic Republic of Pakistan, 1973 the laws inconsistent with the injunctions of Islam shall have no effect to

49

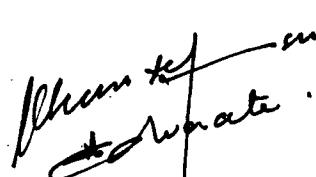
extent of such inconsistency and under Islamic law there is no specific time period has been provided for obtaining the remedy from the court of justice.

4. That it is held by the august Supreme Court of Pakistan and Honourable High Courts time and again by settling the principles for administration of justice that the courts should have to decide a matter on merits and not upon technicalities.

It is, therefore, requested before this Honourable tribunal that in the light of submissions mentioned above, the period of limitation may graciously be condoned in order to meet the ends of justice.

Petitioner Muhammad Iqbal through Counsel

 KHAN AFSAR

  
Advocate

ADVOCATE HIGH COURT

AT HARIPUR

Affidavit:

Solemnly affirmed and declared on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable tribunal.

  
Respondent



DBA No:	144
BC No:	<input type="text"/>
Name of Advocate:	خالد اقبال (شامل)

# وکالت نامہ



S.No: 40901



S.No: 40901  
Date: 23/08/2022

بعدات: جناب حجیر مین سرسوں میڈیونل خبیر فتوں فواہ رضا و  
عنوان: محمد اقبال بنا: گورنمنٹ ضمیر ہائیکورٹ فواہ نیشنل لائبریری  
منائب: محمد اقبال (شامل) نویت مقدمہ: درستہ مدنی مدنی مدنی  
باعث تحریر آنکھ: (محمد اقبال) ماملہ

مقدمہ مذکوب بالا عنوان میں اپنی طرف سے اس طبقہ دادی وجہ دی برائے پیشی یا تصدیق مقدمہ مقام سرسوں میڈیونل کے طبقہ  
کو حسب میں شرائط پر مکمل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بر وقت  
پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری  
غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر زمدادار نہ ہوں گے بلکہ صاحب  
موصوف صدر مقام کچھری کے علاوہ کسی جگہ یا کچھری کے اوقات سے پہلے یا چھپے یا بروز تعطیل پیروی کرنے کے زمدادار نہ  
ہوں گا اور مقدمہ کچھری کے علاوہ کسی اور جگہ ساعت ہوئے پر میکرو نیٹ یا کچھری کے اوقات کے آگے یا چھپے پیش ہونے  
پر مظہر کو کوئی نقصان پہنچتا اس کے زمدادار نہ ہے کہ واسطے کی حادثہ میں کوئی بخوبی یا بخوبی کے والبیں کرنے کے مگر صاحب  
موصوف زمدادار نہ ہو گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف میں کڑاہ راجہ نیشنل لائبریری مقبول ہو گا اور صاحب موصوف کو  
عرض دعویٰ یا جواب دعویٰ اور درخواست انجامے اگری ذکر ہانی ایکن گرائی ذکر ہو تو مکمل خواست پر دستخواستی قدمی کرنے کا ہی  
اختیار ہو گا اور اوس کی حکم یا ذکری کرانے اور ہر چیز کا کوئی پیشوں نہ ہوئے اور داخل کرنے اور ہر قسم کے بیان دینے اور  
اس کے ثاثی دراضی نامہ و فیصلہ برخلاف کرنے ایکل دعویٰ دینے کا ہی اختیار ہو گا اور صورت جانے پر دنیجات از کچھری صدر  
ایکل و یا آمدگی مقدمہ یا منسوخی ذکری یا کھلرنا یا درخواست حکم اتنا ہی یا مرتقی یا کرداری قتل از کرداری واجہے ذکری بھی صاحب  
موصوف کو بشرط ادا یا گلی علیحدہ مختصہ پیروی کا اختیار ہو گا۔ اور بصورت ضرورت صاحب موصوف کو یہ کمی اختیار ہو کا کام مقدمہ  
مزدور یا اس کے کسی جزو کی کارروائی کے باوجود صورت ایکل کی دوسرے وکیل کو پہنچانے یا اپنے ہمراہ مقرر کریں اور رائے وکیل کو  
بھی ہماری میں وہی اور دیے اختیارات حاصل ہو گئے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ  
اتواڑے گا وہ صاحب موصوف کا حق ہو گا۔ اگر وکیل صاحب موصوف کو پوری فہمی تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب  
موصوف کو پورا اختیار ہو گا کہ وہ مقدمہ کی پیروی نہ کریں اور اسکی صورت میں میرا کوئی مطالباً کسی قسم کا صاحب موصوف کے  
برخلاف نہیں ہو گا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند رہے۔

مضبوں وکالت نامہ لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ: 23 اگست 2022  
محل: دن ۱۹ سال

الحمد لله رب العالمين

محمد اقبال (شامل)  
معظم

خالد اقبال (شامل)  
معظم