

26.04.2017

None present for appellant. Mr. Ziaullah, Government Pleader for the respondents present. Notice be issued to appellant and his counsel for arguments for 15.08.2017 before D.B.

  
Member

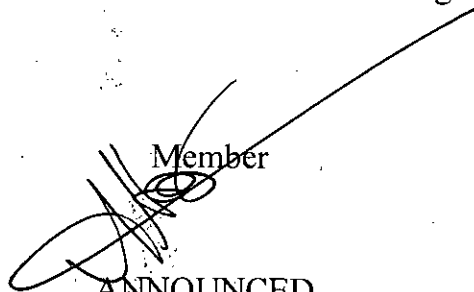
  
Chairman

14202-1326403-7  
Jalil  
15/8

15.08.2017

Mr. Adul Jalil, Husband of the appellant and Asstt. AG for the respondents present. Husband of the appellant submitted pay release order of the appellant and requested that in view of this pay release order, the present appeal may be dismissed as withdrawn.

In view of the pay release order and statement of husband of the appellant, this appeal is dismissed as withdrawn. File be consigned to the record room.

  
Member

  
Chairman

ANNOUNCED  
15.08.2017

15.07.2016

Counsel for the appellant and Mr. Khurshid Ali, SO alongwith Mr. Usman Ghani, Sr.GP for respondents present. Counsel for the appellant submitted an application for impleadment of the necessary parties. Copy handed over to the representative of the respondents. To come up for reply on application as well as arguments on main appeal on 10.08.2016.

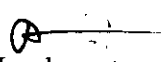
  
Member

  
Member

10.08.2016

Agent to counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Arguments could not be heard due to general strike of the bar. To come up for arguments on

16-12-16.

  
Member

  
Member

16.12.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 26.04.2017.

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

  
(ASHFAQUE TAJ)  
MEMBER

03.04.2015

Counsel for the appellant and Add: AG for the respondents present. Rejoinder not submitted. The appeal is assigned to D.B for rejoinder and final hearing for 15.10.2015.

  
Chairman

16.10.2015

Since 15.10.2015 has been declared as public holiday on account of Ist Muharramul Haram, therefore, case is adjourned to 19.04.2016 for the same.

  
READER

19.04.2016

Counsel for the appellant and Mr. Muhammad Owais Zahid, S.S alongwith Mr. Ziaullah, GP for respondents present. Rejoinder submitted and requested for adjournment. To come up for arguments on ~~29-6-16~~.

  
MEMBER

  
MEMBER

29.6.2016

Counsel for the appellant and alongwith Mr. Muhammad Jan, GP for respondents present. During the course of arguments learned counsel for the appellant when confronted <sup>by question</sup> ~~regarding~~ that the appeal is ~~bad~~ for non-joinder of the necessary parties, ~~he~~ <sup>he</sup> requested that he may be given certain time to file application ~~of~~ making necessary parties. Accordingly the appeal is adjourned. To come up for such application and arguments on 15.07.2016.3

  
Member

  
Member

28.8.2014

Counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1, Mosam Khan, AD for respondent No. 4 and Noor Zaman, Principal, GHS Takhti Nusrati for respondent No. 5 with Mr. Muhammad Adeel Butt, AAG for the respondents present. Written reply has not been received on behalf of remaining respondent No. 2, neither rejoinder has been received on behalf of the appellant. On the request of learned AAG, a last chance is given for written reply on behalf of remaining respondent No. 2 and rejoinder on behalf of the appellant. It was pointed out to the respondents that inspite of the fact that respondent No. 5 has made a reference to the order dated 21.12.2011 in the impugned letter/memo dated 18.12.2012, but the same was not placed on file alongwith the written reply of the respondents. A copy of the letter/memo dated 21.12.2011 was obtained from the representative of respondent No. 5 and placed on file. A copy thereof was also provided to the learned counsel for the appellant on his request. Respondent No. 5 be also summoned in person alongwith complete record for further proceedings/written reply on behalf of remaining respondent No. 2 and rejoinder on behalf of the appellant on 26.12.2014.

  
Chairman

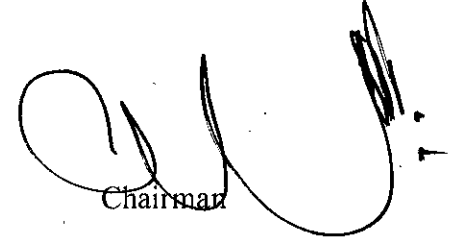
26.12.2014

No one is present on behalf of the appellant. Mr. Muhammad Awais, S.S. on behalf of respondent No. 5 with Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for rejoinder on 03.04.2015.

  
Reader.

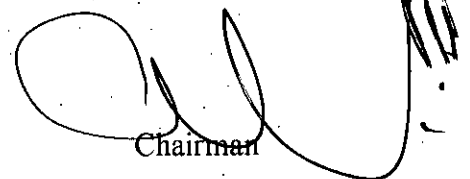
10.3.2014

Mr. Abdul Jalil, husband of the appellant, on behalf of the appellant with counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1, Irshad Muhammad, Supdt. for respondent No. 3, Sajjad Rashid, AD for respondent No. 4 and Noor Zaman, Principal GCMHS, Chokara for respondent No. 5 with AAG present. Written reply has not been received despite last chance given for the purpose on the previous date. On the request of learned AAG, another last chance is given <sup>for written reply</sup> positively, on the next date, otherwise the appeal will be considered and decided on the basis of available record on 23.5.2014.

  
Chairman

23.5.2014

Counsel for the appellant, M/S Khurshid Khan, S.O for respondent No.1, Irshad Muhammad, Supdt. for respondent No.3 and Sajjad Rashid, A.D for respondent No.4 with AAG for the respondents present. Written reply/comments received on behalf of respondents No.1, 3 to 5, copy whereof is handed over to the learned counsel for the appellant for rejoinder. Written reply has not been received on behalf of remaining respondent No.2, and adjournment sought of his behalf. To come up for written reply on behalf of remaining respondent No.2 and rejoinder on behalf of the appellant on 28.8.2014.

  
Chairman

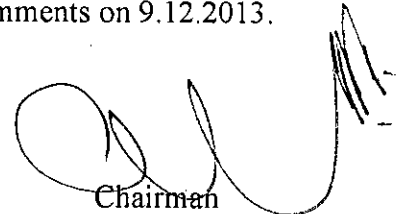
16.5.2013

Mr. Abdul Jalil, husband of the appellant, on behalf of the appellant, M/S Khurshid Khan, SO for respondent No. 1, Mosam Khan, AD for respondent No. 4 and Khan Rashid, Supdt for respondent No. 5 with Mr. Usman Ghani, Sr. GP for the respondents present. To come up for written reply/comments on 23.8.2013.

  
Chairman

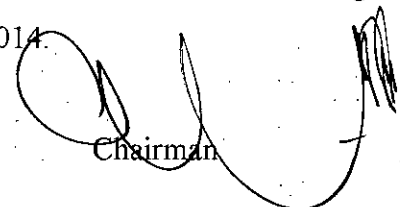
23.8.2013

Mr. Abdul Jalil, husband of the appellant, on behalf of the appellant, M/S Khurshid Khan, SO for respondents No. 1, Tariq Hussain, Supdt. for respondent No. 4 and Safdar Khan, Assistant for respondent No. 5 with Mr. Muhammad Jan, GP for the respondents present. Written reply has not been received on behalf of the respondents, and request for further time made on their behalf. Another chance is given for written reply/comments on 9.12.2013.

  
Chairman

09.12.2013

Mr. Abdul Jalil, husband of the appellant, on behalf of the appellant, M/S Khurshid Khan, SO for respondent No. 1 and Noor Zaman, Principal, Govt. Model High School, Chokara (Karak) for respondent No. 5 with AAG for the respondents present. Written reply has not been received, and request for further time made on behalf of the respondents on the ground that written reply has been prepared but requires vetting and signatures of all concerned. A last chance is given for written reply/comments on 10.3.2014.

  
Chairman


Appeal No. 337/2013.  
Mst. Saheed Akhtar

3. 11.3.2013

Counsel for the appellant present and heard. Contended

that the appellant has not been treated in accordance with the law/rules. The appellant was appointed as PST Teacher on regular basis vide order dated 28.2.1993. She applied through proper channel and was appointed as PET vide order dated 31.12.2010 at GGMS Dagar Karak. The appellant is entitled to counting of her previous regular service for the purpose of pay and pension etc but the same has been denied to her without any justification. The appellant preferred a departmental appeal on 13.12.2011 but with no response. Points raised at the Bar need consideration. The appeal is admitted to full hearing, subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notices be issued to the respondents. Case adjourned to 16.5.2013 for submission of written reply.

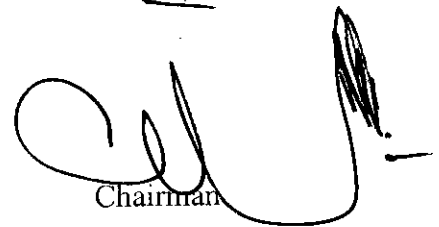
Appellant deposited  
Security & Process fee Rs 229/-  
Bank with file  
receipt is attached  
J.H.



Member.

4. 11.3.2013

This case be put before the Final Bench D for further proceedings.




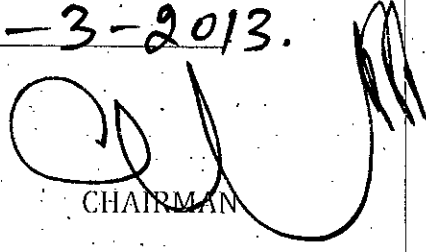
Chairman

Form- A

FORM OF ORDER SHEET

337/2013

Order or other proceedings with signature of judge or Magistrate

1		3
1	04/02/2013	<p>The appeal of Mst. Naheed Akhtar resubmitted today by Mr. Farmanullah Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	7-2-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>11-3-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>




The appeal of Mst. Naheed Akhtar received today i.e. on 23/01/2013 is incomplete on the following scores which is returned to the counsel for the appellatant for completion and resubmission within 15 days:-

1- Appeal may be got singed by the appellatant.

2- Annexures -A and E of the appeal are illegible which may be replaced by legible one.

No. 171 /S.T.

Dt. 24/01 /2013.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

MR. FARMANULLAH KHATTAK ADV. PESH.

*Sita*

*Resubmitted and completed*

*Jm*

*2-2-13*

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

Service Appeal No. 337 of 2013

Mst. Naheed Akhtar .....Petitioner

**VERSUS**

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

**INDEX**

S. #	Description of documents:	Annexure	Pages
1.	Memo of Appeal		1-7
2.	Copy of Office order dated 28.02.1993	A	8-9
3.	Copy of Service Certificate	B	10
4.	Copy of Transfer Form & other relevant documents	B/1	11- 18
5.	Copy of Letter dated 24.12.2009	C	19
6.	Copy of NOC dated 24.12.2009	D	20
7.	Copy of Appointment order	E	21
8.	Copy of Last Pay Certificate	F	22
9.	Copy of Receipts	F/1-F/2	23-24
10.	Copy of Charge Report	F/3	25
11.	Copy of Letter dated 03.12.2011	G	26
12.	Copy of Letter dated 18.12.2012	H	27
13.	Copy of Letter dated 24.04.2007	H/1	28
14.	Wakalatnama		29

Petitioner

Through

*Farmanullah Khattak*  
Advocate,  
High Court, Peshawar

Dated: 23.01.2013

1

BEFORE THE PROVINCIAL SERVICE TRIBUNAL KHYBER  
PAKHTUNKHAWA, PESHAWAR

Service Appeal No. 337 of 213

N.W.F. Province  
Lawyers  
No. 185  
Dated 23/11/13

Mst. Naheed Akhtar Physical Education Teacher (PET) Government  
Girls Middle School Dagar Nari District, Karak.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary  
Elementary & Secondary Education, Peshawar.
2. Secretary to Government of NWFP, Establishment and  
Administration Department, Civil Secretariat, Peshawar.
3. Secretary Finance Government of Khyber Pakhtunkhwa,  
Peshawar.
4. Director Schools Elementary & Secondary Education  
Department, Dabgari Garden, Peshawar.
5. Executive District Officer (Elementary & Secondary) Education,  
District Karak.

..... Respondents.

APPEAL UNDER SECTION 4 OF THE NWFP SERVICE TRIBUNAL  
ACT, 1974 AGAINST THE COMMUNICATION OF REJECTION  
ORDER, DATED, 26-12-2012. VIDE, WHICH APPEAL FOR  
COUNTING THE PREVIOUS REGULAR & CONTINUED SERVICE OF  
THE APPELLANT HAS NOT BEEN CONSIDERED FOR THE  
PURPOSE OF PAY & PENSION, HENCE, REJECTED IN THE LIGHT  
OF THE GOVT. OF NWFP SCHOOLS & LITERACY DEPARTMENT  
NOTIFICATION, DATED, 24-4-2007.

PRAYER IN APPEAL

THAT ON ACCEPTANCE OF THIS APPEAL, THIS HON'BLE  
TRIBUNAL MAY BE PLEASED TO SET-ASIDE THE IMPUGN ORDER  
AND THE SERVICE OF THE APPELLANT MAY GRACIOUSLY BE  
CONSIDERED ON REGULAR BASIS BY COUNTING PREVIOUS  
REGULAR SERVICE FOR THE PURPOSE OF PAY & PENSION AND  
ALL OTHER BACK BENEFITS OR ANY OTHER REMEDY DEEMED  
PROPER AND APPROPRIATE MAY ALSO BE ALLOWED.

Respectfully Sheweth:

*Le July*  
4/2/13

*[Signature]*  
23/11/13

1. That initially appellant was appointed as a PST teacher in Fata Education Department vides Agency Education Office Kohat, Order No-281-83, dated, 28-02-1993. (Copy of the Appointment order is Annex-A).
2. That appellant rendered more than 18 years services in the Education department and was confirm regular & pensionable services. Appellant was lastly posted in a Govt. Girls Middle School Bazi Khel Dara Adam Khel FR Kohat as a permanent teacher and her service certificate & Service Book is attached as Annex- B & B/1).
3. That Executive District Officer (Elementary & Secondary Education, Karak advertised certain posts in which appellant with the prior permission of Agency Education Officer, Kohat applied through proper channel to the post of Female PET vide Edst. No. 3679/AEO, FR Kohat, Dated, 22-12-2009 accompany with no objection Certificate (NOC) and she was recommended by the Selection Committee and was appointed as a PET vide appointment order, dated, 31-12-2010 at GGMS Dagar Nari Karak. (Copy of the Application, NOC & Appointment Order is enclosed as Annex-C, D & E).
4. That it is pertinent to mention here that the appointment of the appellant was made under the amended provision of Govt. of NWFP Civil Servant (Amendment) Act, 2003, came into force w.e.f. 23<sup>rd</sup> July 2005 and notified on 10-8-2005 and she was made clear that her appointment for all

intents and purpose be a Civil Servant except for the purpose of pension & gratuity, however, she was further clarified that candidates already in regular service shall have to give an option either to retain the benefit of CP fund allowed to him/her under his new appointment order under the provision of NWFP Gazette Notification, issued vide Provincial Assembly Secretariat No-PA/NWFP/Bills/2009/11/7/1983, dated, 28-03-2009.

5. That in the mean time similarly place employees approached to this Hon'ble Tribunal with a prayer for regularization of service and whose appeals were allowed by this Hon'ble Tribunal.
6. That it is pertinent to mention here that since the appellant remained regular employee in the Agency Education Office, Kohat, there being no break up in the service of the appellant, rather appellant applied to the said post through proper channel by obtaining prior NOC, therefore, his previous service was to be considered/counted and sanction was granted to him for protection of pay & pension, however, illegally her services was termed as non-pensionable service. (Copy of Last drawn Pay Certificate, Receipt of Service Book, Reliving Order & Charge Report is enclosed as Annex-F, F/1, F/2 & F/3).
7. That the appellant submitted his departmental appeal through proper channel, dated, 3-12-2011, which was endorsed by the Headmistress GCMS Dagar Nari District,

Karak to the Executive District Officer Elementary & Secondary Education Officer, Karak for the issuance of regularization order and treating his appointment as a regular pensionable which has probably been dismissed in the light of the Govt. of NWFP Schools & Literacy Department No- SO (PE) 2-1/FATA/Transfer Policy, dated, 24-4-2007.(Copy of appeal & notification is enclose Annex- G & G/1).

8. That since the rejection order was not communicate to the appellant and therefore appellant waited for some time and again requested for counting previous service for regularization for the purpose of pay & pension, however, this time endorsement was made by the District Officer (Female) over the application that your appeal has already been rejected on 21-12-2011, vide endorsement, dated, 26-12-2012. (Copy of which is enclosed as Annex-H).
9. That the appellant prays for the acceptance of this appeal, inter alias, on the following grounds amongst other:-

**GROUND:**

- A. That the Appellant had joined the Education Department in the Agency Education Office, Kohat initially as a PST in accordance with the law and she was appointed against permanent post and there she rendered more than 18 years service, hence, she is Regular Civil Servant for all intent and purposes including pension and gratuity.

- B. That the case of appellant is covered under the Fundamental rules 12-13, hence, she is entitled to be regularized for the purpose of pay & pension.
- C. That since the appellant remained regular employee of the Education Department and applied to the said post through proper channel by obtaining NOC from the Agency Education Officer, therefore, on his appointment as a PET, she shall be considered regular employee for all intents and purposes as per policy of the Provincial Government.
- D. That the Department has totally misunderstood the implication of Section-19 of the NWFP Civil Servant Act, 1973. The amendment brought is applicable to the fresh appointment made in the terms of contract policy and the employees who are already in regular government service, if apply for appointment through proper channel , than they shall be considered as a regular Civil Servant on the same terms and conditions available to them in the previous service.
- E. That the appellant has been discriminated against as there are similarly placed employees who on fresh appointment were treated as a regular Civil Servant and their previous terms and conditions were made applicable to them, but in the case of appellant it was denied to them.
- F. That the previous service of the appellant has to be counted for the purpose of pay & pension and accordingly sanction has been granted for protection of Pay & pension

and even last pay slip has been forwarded by the Agency Education Officer to Executive District Officer Karak, despite of which she has been illegality denied in the light of Govt. of NWFP Schools & Literacy Department notification No- SO (PE) 2-1/FATA/Transfer Policy, dated, 24-4-2007 which is not at all applicable to the case of appellant.

- G. That even otherwise in the appointment order of the appellant, it was explicitly mention that appointment to the post will be on regular basis and for all intent and purposes be Civil Servant, therefore, their appointment on selection shall be on regular basis on the terms and conditions already available to them and shall not be effected by the policy mention in the rejection order.
- H. That this Hon'ble Tribunal has already allowed identical number of cases and the case of appellant is at par with those cases, hence, the services of the appellant may graciously be declared pensionable by granting pay protection and other emoluments as well.
- I. That even otherwise the case of appellant is within time after communication of the rejection order, however, the Hon'ble Supreme Court laid down the law in a number of judgments that where a point of law is decided by the Superior Court of Pakistan or the Service Tribunal, which not only cover the cases of the Civil Servants who litigated but of other also who may not litigated in time, in such



cases the dictate of justice and good governance demands that such benefits should also be extended to those Civil Servants who may have not litigated instead of forcing them to recourse to litigation, thus on this analogy the department violated such principles and acted illegally.

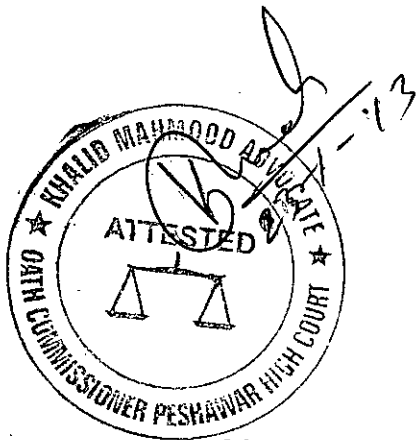
J. That the appellant will seek the permission of this Hon'ble Tribunal to urge additional grounds at the time of argument of this appeal.

It Is Therefore Most Humbly Prayed That On Acceptance Of The Instant Appeal, This Hon'ble Tribunal May Be Pleased To Set-Aside The Impugn Order And The Service Of The Appellant May Graciously Be Considered On Regular Basis By Counting Previous Regular Service For The Purpose Of Pay & Pension And All Other Back Benefits Or Any Other Remedy Deemed Proper And Appropriate May Also Be Allowed.

Appellant, *K Jaheed*

Through *Farman*

(Farmanullah Khattak),  
Advocate High Court, Peshawar.



Affidavit.

I, Mst. Naheed Akhtar Physical Education Teacher (PET) Government Girls Middle School Dagar Nari District, Karak, do hereby solemnly declare on oath that the contents of the above Service Appeal as given by me are true and correct to the best of my knowledge and that nothing has been concealed or kept secret from this Hon'ble Tribunal.

*K Jaheed*  
Deponent.

## OFFICE OF THE HEADMISTRESS

OFFICE OF THE ELEMENTARY EDUCATION OFFICER OF THE AGENCY  
FR KOHAT.

--- APPOINTMENT / TEACHER OF P.T.C.

.....

Consequent upon the approval of the Selection Committee on 4/2/93, under the Chairmanship of the Agency Education Officer, Orakzai Agency FR Kohat, on telephonic permission by the Director of Education FATA (NWFP) Peshawar, the following appointment Transfer of the concerned candidates are hereby proposed in BPS-7 plus usual allowances on their own pay & drawn in the interest of public service w.e.f. taking over charge.

S.No.	Name & Father Name.	From	To	Remarks
1-	Tasleem Bibi D/O Pir Nemidin.			Candidate. GGPS, Amel Khal Vice Aube do She been PTC not taken over charge.
2-	Mahid Akhter s/o Imraf Khan.	-do-		GGPS, Teer Chapper (Qayum Bela) against the newly created PTC Post.
3-	Tasleem Bibi W/O M. Shoukat Khan.	GGPS, Biland Khel Orakzai Agency.	GHS, Teer Sherpper	against the newly created post (Qayum Bela) will be work GHS Neer Ali Killa FR Kohat.

- Note:-
1. Charge report should be submitted in duplicate to this office.
  2. Candidates concerned to get their Health & age certificate from D.H.O Civil Hospital, Kohat.
  3. Their appointment are made on temporary basis on purely which can be terminate any time without assigning any reason.
  4. Their documents will be checked before the taking over charge.
  5. Fresh candidates will not be taking over charge if they are below their 18 to 40 years of age.

Sd/- Agency Education Officer,  
Orakzai Agency & FR Kohat.

Endst: No. 281-83/Dated FR Kohat the, 28/2/1993.

Copy to the :-

- 1- Director of Education FATA (NWFP) Peshawar for information.
- 2- A.A 2.0 (F) in the local Office.
- 3- Accountant in -do-
- 4- General file.

Sd/-

Attended  
7

8

Amir A (K)

OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY & P. KOHAT.

APPOINTMENT/TRANSFER OF P.T.O.

Consequent upon the approval of the Selection Committee on 4/2/93, under the chairmanship of the Agency Education Officer, Orakzai Agency & P. Kohat, on the permission by the Director of Education PATA (NWFP) Peshawar, the following appointments/transfer of the concerned candidates are hereby ordered in MS-7 plus usual allowance on their own pay & grade in the interest of public service w.o.f. taking over charge.

S.No.	Name of Candidate	From	To	Remarks
1.	Thaliam Sibi D/O Mir Nordin	Candidate.	GGPS, Asai Khel	vice Subed. He been not taken over charge.
2.	Thaliam Sibi D/O Mir Nordin	-do-	GGPS, Poor Chapper (Qayum Kala)	against the newly created P.T.O post.
3.	Thaliam Sibi D/O Mir Nordin	GGPS, Wiland Khel Orakzai Agency	GGPS, Poor Chapper (Qayum Kala)	against the newly created P.T.O post. He will be work at GGPS, Poor Chapper (Qayum Kala)

- Note:-
1. Charge report should be submitted in duplicate to this Office.
  2. Candidates concerned to get their Health & eye Certificate from D.H.O Civil Hospital Kohat.
  3. Their appointment are made on temporary basis on purely which can be terminated any time with out assigning any reason.
  4. Their documents will be checked before the taking over charge.
  5. From the candidates will not be taking over charge if they are below 18 years of age.

*[Signature]*  
 Agency Education Officer,  
 Orakzai Agency & P. Kohat.  
 28.2.93

Encl: No. 281-83 / Dated P. Kohat the, 28 / 2 / 1993.

Copy to the:-

1. Director of Education PATA (NWFP) Peshawar for information.
2. A.A.E.O (E) in the local Office.
3. Accountant in -do-
4. General file.

*[Signature]*  
 Agency Education Officer,  
 Orakzai Agency & P. Kohat.

*Accepted*  
*[Signature]*

2819-24

Endst No. \_\_\_\_\_ /AE-1/PET/Appointment Dated Karak the 31/12/01

Copy of the above is forwarded to the :-

- 1- Director Elementary & Secondary Education Deptt: Khyber Pakhtoon Khwa Peshawar.
- 2- District Coordination Officer Karak.
- 3- District Officer (M) Elementary & Secondary Education Local Office with the request to personally verify the documents of the newly appointed teachers.
- 4- District Accounts Officer Karak with the request not to honour their pay until & unless verification of documents from the concerned Board/ University is received. Further more this office will issue proper pay release order after verification.
- 5- All Head Mistress concerned.
- 6- Candidates concerned.

Sd/-

EXECUTIVE DISTT: OFFICER  
ELEMENTARY & SECONDARY EDUCATION  
K. A. R. A. K.

*Alleged*  
*7*

9

2819-24

Enc. No. /AE-1/PE1/Appointment

Dated Karak the 31/12/2010

Copy of the above is forwarded to the: -

1. Director Elementary & Secondary Education Deptt: Khyber PakhtoonKhwa Peshawar.
2. District Coordination Officer Karak.
3. District Officer (M) Elementary & Secondary Education Local office with the request to personally verify the documents of the newly appointed teachers.
4. District Accounts Officer Karak with the request not to honour their pay until & unless verification of documents from the concerned Board / University is received. Further more this office will issue proper pay release order after verification.
5. All Head Mistress concerned.
6. Candidates concerned.

*[Signature]*  
EXECUTIVE DISTT: OFFICER  
ELEMENTARY & SECONDARY EDUCATION  
KARAK

Accepted  
7

10

Ames (B)

OFFICE OF THE AGENCY EDUCATION OFFICER FR  
KOHAT, KDA, KOHAT


SERVICE CERTIFICATE

It is certified that Miss Naheeda Akhtar Daughter of Israaf Khan is serving in this Department as PET at GGMS Bazi Khel Dara Adam Khel FR Kohat w.e.f 01/03/1993 to-date.

Dated: 27/12/2009

Agency Edu: Officer  
F.R. Kohat

Seal

  
Agency Education Officer  
FR Kohat, KDA KOHAT.

Attested  
7

**APPLICATION FORM FOR TRANSFER OF PTC TEACHERS FROM FATA TO SETTLE DISTRICT IN NWFP**

11 Amir B/1

1. Name of Teacher/Applicant Miss Nafeed Akhter
2. Father's Name Asraf Khan
3. Domicile Kohat
4. Date of Birth 02-02-1969
5. Permanent Address House # 57 Sect # 04 KDA Kohat
6. First Appointment Edu: Department 28-02-1993
  - a. Date of Appointment 28-02-1993
  - b. Appointment order No. 281-83
  - c. Name of the School at 1st appointment G. Govt. PS Daryum, F.R. Kohat
  - d. Name of School of present posting GPS/GGFS MS Bazikhel, F.R. Kohat
7. Academic Qualification B.A.
8. Professional Qualification PTC & JDP
9. Roll No. PTC Exam. with year of passing PTC 60
10. Board/Doptt./University from where you have passed PTC.
11. Date of taking over charge on PTC post as trained teacher
12. Reason for inter district transfer Long distance
13. District in which transfer is requested Kohat

I solemnly declare that all these information from S.No 1 to 13 are correct.

Name of the Applicant Nafeed Akhter  
 Signature [Signature]  
 ID No. (Copy Enclosed) 11301-0958667-2

**RECOMMENDATION:**

I hereby recommend and certify that Mr/Mrs Nafeed Akhter is working as PTC trained teacher at GPS/GGFS Bazikhel, F.R. Kohat. His/her service book and other documents verified and found complete upto [Date]. He/She is on the active role of this District/Agency and his/her performance is satisfactory.

The following documents duly attested by me are attached herewith:-

1. SSC (Certificate).
2. PTC (Certificate).
3. Domicile Certificate
4. Copy of Service book
5. Service Certificate of Spouse (in case of Wife/Husband Policy)
6. Nikah Nama, Domicile/I.D. Card (of both Husband & Wife in case of marriage of female teacher to other District)
7. Any other documents if required in support of the case
8. Ist:appointment Order.

Counter Signed

AGENCY EDUCATION OFFICER  
 Name [Signature]  
 Signature Agency Edu: Officer  
 Date F.R. KOHAT

Director of Education  
 (FATA) NWFP, Peshawar.

Endst: No. 3431 / Dated: 15/2/2006 1901.  
 Copy forwarded to the District Education Officer (M&F) Primary Kohat

With the remarks that I have no objection on the above named PTC Teacher for his/her transfer from FATA to Kohat and forwarded to DEO of District Kohat of post availability as per enclosed Proforma.

[Signature]  
 Director of Education (FATA)  
 NWFP, Peshawar

*Amir*

1. Name (نام) Mahmood Khan

2. Nationality and Religion Pakistan Islam  
(قومیت اور مذہب)

3. Residence (مستقل رہائش) Kohat City

4. Father's name and residence Zeyaf Khan  
(والد کا نام اور پتہ)

5. Date of birth by Christian era as nearly as can be ascertained... 1969  
(تاریخ پیدائش مطابق سن عیسوی)

6. Exact height by measurement... 5' 5"  
(قد و قامت)

7. Personal mark for identification... Small black marks on the back of left hand  
(لشان شناخت)

8. Left hand/right hand thumb and finger impressions of (Non-gazetted) officer  
(مرد کی صورت میں ہائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)



Little Finger (چھٹکیا)



Ring Finger (چھٹکیا کے ساتھ کی انگلی)

Middle Finger (انگلی)

Fore Finger (انگلی شہادت)

Thumb (انگوٹھا)

9. Signature of Government servant... Mahmood Khan  
(سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office, or other Attesting Officer...  
(تصدیق کنندہ افسر کے دستخط اور مہر)

Mahmood Khan  
Agency Education Officer  
District Agency, Kohat

Note.—The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.  
اس منہج کے مسترجعات کم از کم ہر پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر ۹ - ۱۰ میں دستخطوں کے ایسے تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

Mahmood Khan



Other em.	Other em. training	Date of appoint-ment	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3	1/3

Grads (Revised) Grades in BPS 7 = 1480-81-2695

Tempor  
Khalid

1/3 1/3 1/3

1/3 1/3 1/3

1/3 1/3 1/3

1/3 1/3 1/3

1/3 1/3 1/3

1/3 1/3 1/3

1/3 1/3 1/3

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc)	Signature of the Head of the office or other Attesting Officer	LEAVE چھٹی Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debited to another Government حاربانہ کی رخصت کے لئے اوسط تنخواہ کا لین Nature and duration of leave taken رخصت کی نوعیت و معیار Period Govt. to which debited گورنٹ جسے رقم ادا ہوگی		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 سزا یا جزا یا عتاب یا تعزیر کی کارروائی کا ریکارڈ
A.B.O. Kohat	31/9/4	P.R.	<i>[Signature]</i>	Discontinued against monthly		<i>[Signature]</i>	
A.B.O. Kohat	30/11/4	No Inc.	<i>[Signature]</i>	passed 28-12-1947 under P.A. 2850		Agency Education Officer Orakzai Agency & P.R. Kohat	
A.B.O. Kohat	30/9/5	No Inc.	<i>[Signature]</i>	passed 28-12-1947 under P.A. 2850		Agency Education Officer Orakzai Agency & P.R. Kohat	
A.B.O. Kohat	15/3/57	No Inc.	<i>[Signature]</i>	passed 28-12-1947 under P.A. 2850		Agency Education Officer Orakzai Agency & P.R. Kohat	
A.B.O. Kohat	15/9/57	No Inc.	<i>[Signature]</i>	passed 28-12-1947 under P.A. 2850		Agency Education Officer Orakzai Agency & P.R. Kohat	
A.B.O. Kohat	30/11/58	No Inc.	<i>[Signature]</i>	passed 28-12-1947 under P.A. 2850		Agency Education Officer Orakzai Agency & P.R. Kohat	

Whether substantive or officiating, and whether permanent or temporary.	(i) substantive or vice count for appointment under C.S.R. (P.S.) rules 3.20 of volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government Service
					16/8/97	
					16/8/97	
					17/3/97	
					19/7/97	

1  
 2  
 3  
 4  
 5  
 6  
 7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28  
 29  
 30  
 31  
 32  
 33  
 34  
 35  
 36  
 37  
 38  
 39  
 40  
 41  
 42  
 43  
 44  
 45  
 46  
 47  
 48  
 49  
 50  
 51  
 52  
 53  
 54  
 55  
 56  
 57  
 58  
 59  
 60  
 61  
 62  
 63  
 64  
 65  
 66  
 67  
 68  
 69  
 70  
 71  
 72  
 73  
 74  
 75  
 76  
 77  
 78  
 79  
 80  
 81  
 82  
 83  
 84  
 85  
 86  
 87  
 88  
 89  
 90  
 91  
 92  
 93  
 94  
 95  
 96  
 97  
 98  
 99  
 100

9	10	11	12	13 LEAVE Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debited to another Government		14	15
Signature and Designation of the Head of the office or other Attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc)	Signature of the Head of the office of other Attesting Officer	Nature and duration of leave taken	Govt. to which debited	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
دستخط امیر مجاز	تاریخ انقطاع ملازمت	وجوہات انتقال ملازمت ترقی، تبادلہ یا برطرفی	دستخط امیر مجاز	نوعیت و نوعیت و معیار	ہار یا ملک کی رخصت کر کے اوسط تنخواہ کا تعین	دستخط امیر مجاز	سزا یا جزا یا عتاب کارکردگی کا ریکارڈ
دستخط امیر مجاز	5/12/91	Passed P.T.C. Exam	[Signature]	[Signature]	B.S.E. Deshawar in 1995 (Annual) 16 193.5 marks in Grade D	[Signature]	Passed F.A Exam from Session 1995 under Roll No 16193.5 Obtained 162/100 marks in Grade D
[Signature]	15/8/97	Passed P.T.C. Examination 1996	[Signature]	[Signature]	Kohat	[Signature]	Kohat
[Signature]	11/9/97	Drawals 98/-	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]
[Signature]	13/5/97 to 31/10/96	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]



9	10	11	12	13	14	15		
Signature and Designation of the Head of the office of other arresting officer in attention of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office of other Arresting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debited to another Government	Period Govt. to which debited	Signature of the head of the office or other arresting officer	Reference to any recorded punishment or censure, or reward or prize of the Government servant

From 1-12-96 to 30-11-92

Signature: [Handwritten Signature]

Approved by [Handwritten Signature]

Signature: [Handwritten Signature]

Approved by [Handwritten Signature]

Signature: [Handwritten Signature]

Approved by [Handwritten Signature]

Signature: [Handwritten Signature]

Approved by [Handwritten Signature]

Signature: [Handwritten Signature]

Approved by [Handwritten Signature]

Signature: [Handwritten Signature]

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment or (ii) whether service count for pension under rules 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating زائد تنخواہ	Other emoluments falling under the term "pay" ناسوائے تنخواہ دیگر الاوتس	Date of appointment تاریخ تقرری	Signature Government service دستخط سرکاری ملازم
درجہ ملازمت	عارضی، مستقل قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق پیشن کا مستحق ہے	تنخواہ بلور عارضی ملازمت	زائد تنخواہ بلور قائم مقام			
			RS. P.	PS P.			
				2411/3		12/02	
P/Asst. Subdy in B/S-14 - Bilva - 240-10300							
				3100/P.M		23/02	✓
				3100/P.M		12/02	



9 Signature and Designation of the Head of the office or other Attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc)	12 Signature of the Head of the office of other Attesting Officer	13 LEAVE Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave is debited to another Government		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	Govt. to which debited		
				Period	Govt. to which debited		
دستخط امیر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی، تبادلہ یا برطرفی	دستخط امیر مجاز	طبیعت کی نوعیت و مہینہ	گورنمنٹ جسے رقم ادا ہوگی	دستخط امیر مجاز	سزا یا جزا یا عتاب یا تادیب کا ریکارڈ
✓	11/02	No hr	✓	Passed	PET Exam	✓	Completed
✓	27/02		✓	TR/No. 6	From R.D.E. N. in F.P.	✓	
✓	27/02		✓	obtained 52.8%	Result	✓	
✓	27/02		✓	Passed	PET	✓	declared on 31/3/02
✓	12/02	No hr	✓	BA Exams		✓	allocated BBS-14
✓	11/03	No hr	✓	Passed	BA Exams	✓	Completed
✓	30/03		✓	TR/No. of 452797	From A. H. O.	✓	
✓	36/7/03		✓	28 marks	obtained 52% marks	✓	in final C, & Result included on 23/8/02. (marks 47/100)
✓	29/7/03		✓	course started upon passing	its PET & BA Exams	✓	held on 23/8/02
✓	18/7/03		✓	Allocated BBS-14	with AEO	✓	
✓			✓	TR No. 6	order No-153	✓	
✓			✓	dated	18/7/03	✓	

Attested

Agency





9 Signature and Designation of the Head of the office or other Attesting officer in attestation of columns 1 to 8.	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal etc)	12 Signature of the Head of the office or other Attesting Officer	13 LEAVE Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debited to another Government		14 Signature of the head of the office or other Attesting officer	15 Reference to any recorded punishment or censure, or reward or period of the Government servant
				Nature and duration of leave taken	<p>جاری مدت کی رخصت کے لئے اوسط تنخواہ کا تعین</p> <p>Govt. to which debited</p> <p>گورنمنٹ جسے رقم ادا ہوگی</p>		
				Period	عرصہ		
				Allocated BPS-5 range pay			
Shah Hussain A. E. O. R. K. KHAN	30/11/02	mon	Shah Hussain A. E. O. R. K. KHAN	30/11/02	Passing P&T & B & E pay ref. 23/8/02	in BPS 14	male
					154	Dole 18/2/03	
Shah Hussain A. E. O. R. K. KHAN	30/11/05	19 days	Shah Hussain A. E. O. R. K. KHAN				
Shah Hussain A. E. O. R. K. KHAN	30/11/05	9 months	Shah Hussain A. E. O. R. K. KHAN		30/11/05 from 12/11/05		
Shah Hussain A. E. O. R. K. KHAN							
						Service Verified 11/12/02	
						A. E. O. R. K. KHAN	
						Service Verified 20/11/02	

Attested

M. J. J. J.


128306  
 105-06  
 11-03-06  
 11-03-06  
 11-03-06

11-03-06  
 11-03-06  
 11-03-06  
 11-03-06

11-03-06  
 11-03-06  
 11-03-06

16	17	18	19	20	21	22
<p>Reason for any recorded punishment or censure or award of honor of the Government or award of honor of the Government</p>	<p>Signature of the head of the office or other Assessing officer</p>	<p>Allocation of periods of leave on average pay up to four months (or period less than not exceeding 120 days) to which leave entry is debited to another Government</p> <p>Period Govt. to which debited</p>	<p>Signature of the Head of the office of other Assessing Officer</p>	<p>Reason of termination (such as promotion, transfer, etc)</p>	<p>Date of termination or appointment</p>	<p>Signature and designation of the Head of the office or other Assessing officer in column 1 to 4</p>

19

Anwar (C) 

No 3679 /AEO,FR Kohat.

Dated the 22/12/2009

From: The Agency Education Officer  
FR Kohat.

To: The Executive District Officer,  
Elementary & Secondary Education,  
Karak.

Through: PROPER CHANNEL

Subject: Application For the Post of Fe-Male PET in Settle Area Distt:Karak  
Ref: Advertisement Daily Mashriq dated 17 Dec:2009

Memo, Enclosed please find herewith application of Ms.Naheeda Akhtar PET at GGMS  
Bazi Khel Dara Adam Khel FR Kohat along with the following documents.

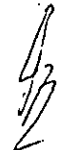
Detail is under below:-

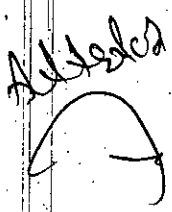
- 1- Application Form of Distt:Karak for PET post.
- 2- Photocopies of all relevant documents along  
DMC's and Provisional Certificates and Degree.
- 3- Domicile & CNIC along husband Domicile photo copy attached.
- 4- No objection Certificate of this office.
- 5- Service Certificate of this office.
- 6- Photo copies of Service Book

Further it is stated that we will relieve the applicant (above named teacher) if she is  
appointed against PET Post in District Karak. The undersigned has no objection over  
her appointment there.

Hope for favourable action please.

Dated: 24/12/2009

  
Agency Education Officer  
F.R. Kohat, KDA KOHAT  
Agency Edu: Officer  
F.R. Kohat



20

Amee

(D)

**OFFICE OF THE AGENCY EDUCATION OFFICER**  
**FR KOHAT, KDA, KOHAT**


**NO OBJECTION CERTIFICATE (NOC)**

It is certified that Miss Naheeda Akhtar Daughter of Israf Khan is serving in this Department as PET at GGMS Bazi Khel Dara Adam Khel FR Kohat w.e.f 01/03/1993 to-date.

The undersigned has no objection if she is selected for the post of PET at Karak District.

Agency Edu: Officer  
F.R. Kohat  
Seal

Dated: 27/12/2009

  
Agency Education Officer  
FR Kohat, KDA KOHAT.  
*mm*

*Attest*  
*7c*

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY  
AND SECONDARY EDUCATION KARAK

APPOINTMENT ORDER

Consequent upon the approval of the District Recruitment/Selection Committee Karak, the following candidates are hereby appointed against the vacant posts of PET EPS-9 (3820-230-10720) @ Rs.3820/- PM plus usual allowances as due and admissible under the prescribed rules/quota (75% batch wise/year wise and 25% open Merit) on regular basis with effect from the date of their taking over charge on the terms and conditions mentioned below in the schools noted against each :-

75% Batch Wise Quota (02) Posts.

S.No.	Name	Father's Name	PET	GGMS	Posted at
1-	Naheeda Akhtar	Israaf Khan	PET	Baza Khel	GGMS-P Nari FR Kohat.
2-	Shahida Kalsoom	Yaqoob Khan	Fresh	Mir Hawas Banda.	GGHS Awarana Musakan.

S.No.	Name	Father's Name	Desig:	Address:	Posted at
1-	Azmat Shahin	Ali Hassan	Fresh	Ahmad Abad	GGHS Nari Panos

TERMS & CONDITIONS:

- 1- No TA/DA etc: is allowed
- 2- Charge reports should be submitted to all concerned in duplicate.
- 3- Appointment is subject to the condition that the certificate / documents must be verified from the concerned authorities by the undersigned. If any one found producing bogus certificates he will be reported the law enforcing agencies for further action and their services will be considered as automatically

Alkshid  
7

dismissed with no privileges of the post if any.

- 4- Under the provision of Government of N.W.F.P Civil Servant (Amendment) Act, 2005 came into force w.e.f. 23rd July, 2005, notified vide Establishment & Administration Deptt: (Regulation Wing) Govt: of N.W.F.P No. SO SO(Regulation) 6 (E&AD) 1-13/2005 dated 10/08/2005,. All the above persons and the persons appointed on regular basis to services are posted in the prescribed manner after the commencement of the said Act shall, for all intends and purposes be a civil servant except for the purpose of pension or gratuity. Such a civil servant shall in lieu of pension and gratuity, be entitled to receive such amount contributed by him towards the Contributory provident fund along with the contribution made by the Govt: to his account in the said fund, in the prescribed manner.
- 5- If they fail to take over charge within thirty (30) days, the appointment order will be deemed as cancelled.
- 6- Health & age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 7- They are required to produce an affidavit on stamp paper regarding the genuineness of the certificate/degrees submitted by them in response of the advertisement of this office. They should not be allowed to take over charge if they fail to produce affidavit at the time of their arrival to join the duty to the concerned DDO. The DDOs concerned should countersigned the affidavit and the same should be submitted to the undersigned for record.
- 8- All the appointees will be entitled for the benefit as a candidate to a Civil Servant except Pension & Gratuity.
- 9- This office will verify their documents from the concerned authorities of their own expenses.
- 10- The candidates already in regular service shall have to given an option to retain the benefit of contributory provident fund allowed to him under his new appointment. Under the provision of NWFP Gazette Notification issued vide Provincial Assembly Secretariat No.PA/NWFP/Bills/2009/11/7/83 dated 28.3.2009.
- 11- They will remain on probation for a period of 01 year.

(MUHAMMAD SHAIQB ZAMAN )  
EXECUTIVE DISTT: OFFICER  
ELEMENTARY & SECONDARY EDUCATION.

Amended  
7

**APPOINTMENT ORDER**

Consequent upon the approval of the District Recruitment/Selection Committee Karak, the following candidates are hereby appointed against the vacant posts of PET BPS-9 (5820-230-10720) @ RS.5820/- PM plus usual allowances as due and admissible under the prescribed rules/quota (75% batch wise/year wise and 25% Open Merit) on regular basis with effect from the date of their taking over charge on the terms and conditions mentioned below in the schools noted against each:-

**75% Batch Wise Quota (02 Posts)**

S.No.	Name	Father's Name	Design	Address	Posted at
1	Nanecda Akhtar	Israf Khan	PET	GOMS Bazi Kheil (FR Kohat)	GOMS Waram Musakan
2	Shahida Kalsoom	Yaqoob Khan	Fresh	Mir Havas Banda	GOMS Waram Musakan

**25% Open Merit (01 Post)**

S.No.	Name	Father's Name	Design	Address	Posted at
1	Azmat Shahin	Ali Hassan	Fresh	Ahmad Abad	GOMS Nari Panos

**TERMS & CONDITIONS**

No T/ADA etc is allowed.  
 Charge reports should be submitted to all concerned in duplicate.  
 Appointment is subject to the condition that the certificates / documents must be verified from the concerned authorities by the undersigned. If any one found producing bogus certificates, he will be reported to the law enforcing agencies for further action and their services will be considered as automatically dismissed with no privileges of the past if any.  
 Under the provision of Government of N.W.F.P. Civil Servant (Amendment) Act, 2005 came into force w.e.f. 23<sup>rd</sup> July, 2005, notified vide Establishment & Administration Dept. (Regulation Wing) Govt. of N.W.F.P. No. SO(Regulation)6 (K&AD)1-13/2005 and 10/03/2005. All the above persons and the persons appointed on regular basis to services are posted in the prescribed manner after the commencement of the said Act shall, for all intents and purposes be a civil servant except for the purpose of pension or gratuity. Such a civil servant shall in lieu of pension and gratuity, be entitled to receive such amount contributed by him towards the Contributory Provident Fund along with the contribution made by the Govt. to his account in the said fund, in the prescribed manner.  
 If they fail to take over charge within three (30) days, the appointment order will be deemed as cancelled.  
 Health & age certificate should be produced from the Medical Superintendent concerned before taking over charge.  
 They are required to produce an affidavit on stamp paper regarding the genuineness of the certificates/degrees submitted by them in response of the advertisement of this office. They should not be allowed to take over charge if they fail to produce the affidavit at the time of their arrival to join the duty to the concerned DDO. The DDOs concerned should comment on the affidavit and the same should be submitted to the undersigned for record.  
 All the appointees will be entitled for the benefits as admissible in a Civil Servant except Pension & Gratuity.  
 This office will verify their documents from the concerned authorities of their own expenses. The candidates already in regular service shall have to given an option either to remain the benefit of contributory provident fund allowed to him under his new appointment. Under the provision of NWFP Gazette Notification issued vide Provincial Assembly Secretariat No.PA/NWFP/BMIS/2009/17/1983 dated 28.3.2009.  
 They will remain on probation for a period of 01 year.

*Muzaf*

11  
10  
9  
8  
7  
6  
5  
4  
3  
2  
1

*Muzaf*  
 (E) (A)



**LAST PAY CERTIFICATE**

Form No. 19 (2003) (Part of Form 16)

*(Signature)*

Last Pay Certificate of *Mr. Rajendra Prasad* P.E.T.

of the *State Bank of India* is hereby transferred to *State Bank of India* proceeding to

He has been paid upto *31-1-2011* (i.e. 31-1-2011)

as per following rates: *Do 17-66* P to *01/15/82*

Substantive Pay:—	1200
Officiating Pay:—	1528
Exchange Compensation Allowance:—	1770
	1830
	1931
	1884
	1985
	1908
	1948

Total	22507
	1970
	1984
	1985
	1908
	1948

He made over charge of the Office of *P.E.T. Post* on the *31-1-2011* (i.e. 31-1-2011)

Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

He is entitled to draw the following:—

He is also entitled to joining time for *2067* days.

The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

*Forwards to be made to Government*

*Signature*

*Designation*

Handwritten mark resembling a stylized '7' or 'L'.

Handwritten text, likely a receipt or acknowledgment, including the word "Receipt" and names like "Nahceda" and "M/O".

Handwritten initials or signature in a circle.

Handwritten number "13" in a circle.

Amee (P/W)  
F/2

Relieving Chit

It is certified that Ms. Nahedla Alhajar PET  
of this school who has been appointed at GGMS  
D/Inst Dist. Karan vide no 2819-24 dt 31-12-2000  
is hereby relieved of her duty to day on 24/01/2011 (AM)  
Nothing is outstanding against her.

Chazala Shaheen  
H/M

GGMS BARI KHAL  
FR KANAT

A. H. S  
7

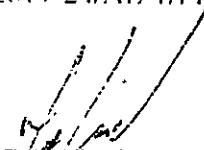
25

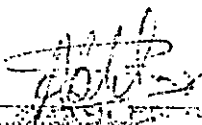
Area (F/3)

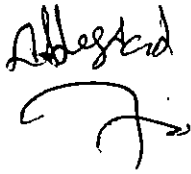
(S/S)

CHARGE REPORT

Certified that I (Naheeda Akhtar) have taken /handed over charge as PET in GGMS D-Nari District Karak vide Endst: No. 2819-24/AE-1/PET/appointment dated 31/12/2010 today on 25-01-2011 AN.

Sign:   
Naheeda Akhtar PET

Sign:   
Headmistress  
GGMS D-Nari (Karak)



To The Executive District Officer  
Elementary & Secondary Education, Karak

THROUGH: PROPER CHANNEL

SUBJECT: APPEAL FOR COUNTING OF PREVIOUS SERVICE AS  
REGULAR & CONTINUED SERVICE

R/Sir

With due respect I have the honour to state that I was appointed as PST vide Agency Education Officer Kohat order No.281-83 dated 18-02-1993 and on 01-03-1993 I took over as such later on appointed as PET.  
**(Order Photo copy attached)**

In response to your advertisement for the posts of PET's, I submitted my application for appointment through proper channel along with NOC of Agency Education Officer Kohat.  
**(Photo copies attached)**

I was appointed as PET vide your Endst:No.2819-24/A.E-I/PET.Apptt dated 31/12/2010 at GGMS Dagar Nari (Karak).  
**(Order Photo copy attached)**

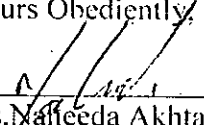
I was relived by the Agency Education Officer Kohat and took over as PET at GGMS Dagar Nari (Karak) on 25/01/2011AN.  
**(Photo copy attached)**

The Agency Education Officer Kohat issued LPC and sent my service Book to your good office.  
**(Receipt Attached)**

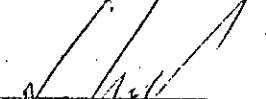
I request your honour that I have 18 years 7 months service at my credit with no break. I may be granted pay according to LPC and my previous service may be counted as regular service.

Hope for favorable action please.  
Thanks.

Dated:03/12/2011

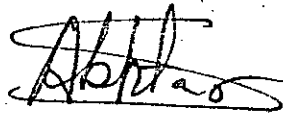
Yours Obediently  
  
Ms. Naheeda Akhtar PET  
GGMS Dagar Nari(Karak)

Copy of the above is forwarded as advance copy EDO(E&S) for n/a please.

  
Ms. Naheeda Akhtar PET  
GGMS Dagar Nari(Karak)

*Abdullah*

*Endst no 447 dt 9/12/2011*



**SHANVEEN AKHTAR  
HEAD MISTRESS  
G.G.M.S. DAGAR NARI  
DISTT KARAK**

27

Arise (H)

OFFICE OF THE HEADMISTRESS  
GOVT: GIRLS HIGH SCHOOL WARANA MOSAKAN  
DISTRICT KARAK.

NO. 398 / Dated Warana Mosakanth

18/12/2012.

*DO (F)*  
*for Naheed Akhtar*

*[Signature]*

To

The Executive District Officer  
Elementary & Secondary Education  
Karak.

SUBJECT:-

APPEAL FOR COUNTING OF PREVIOUS SERVICE AS  
REGULAR AND CONTINUED SERVICE.

*TS*  
*26/12*

Memo:

Enclosed please find herewith an appeal alongwith  
other papers in respect of Naheed Akhtar PET of this school for  
favourable consideration and necessary action.

*g/c*

*[Signature]*



HEADMISTRESS  
GOVT: GIRLS HIGH SCHOOL WARANA MOSAKAN  
(KARAK).

*[Signature]*

*Date 26-12-2012*

*The said appeal of  
teacher concerned was  
already rejected vide  
this office No 420  
Dt: 21/12/2011*

*[Signature]*  
District Officer (Female)  
Elementary & Secondary Edu. Dept.  
Karak  
*16/12/2012*

(28) *Amir*   


GOVERNMENT OF NWFP  
SCHOOL & LITERACY DEPARTMENT  
NO.SO (PE) 2-1/FATA Transfer/Court's Decision/07  
Dated Peshawar The 24/04/2007. I

1. The Director Schools & Literacy, NWFP, Peshawar.
2. The Director Education FATA, NWFP, Peshawar.
3. The Director Curriculum & Teachers Education, NWFP Abbottabad.
4. The Director Provincial Institute for Teachers Education NWFP, Peshawar.
5. All the District Coordination Officers in NWFP.
6. All the Executive District Officers Schools & Literacy in NWFP.

Subject: POSTING / TRANSFER OF TEACHERS FROM FATA TO SETTLED AREA AND VICE VERSA.

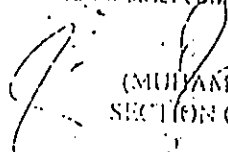
24/4/07

I am directed to refer to the above noted subject and to state that the policy decisions regarding transfer from FATA to settled area and vice versa were circulated to all concerned after obtaining approval of the competent authority vide this department letter of even No. dated 11-05-2006. However it has been noticed that the same are not strictly adhered to/complied with and even now NOCs for transfer are being issued in utter disregard of the standing policy.

In order to check this unoward practice the matter was discussed during a meeting chaired by the Secretary Establishment Department on 24-03-2007 and the following decision/recommendations were unanimously agreed to by the participants of the meeting:-

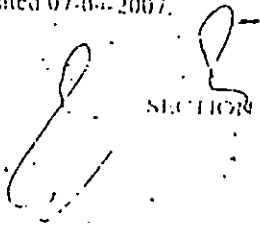
1. NOC granted by the Civil Secretariat FATA to teachers upto B-15 be cancelled forthwith.
2. The NOCs for teachers in BPS-16 and above be remained intact.
3. If a teacher having domicile of settled area is appointed in FATA and after appointment he intends to come to settled area then he should apply for the post advertised for settled areas afresh and should quit his service from FATA.

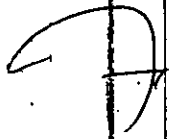
In view of the above it is requested that the above decisions/recommendations may kindly be brought to the notice of all concerned for strict compliance.

  
(MUHAMMAD AYUB KHAN)  
SECTION OFFICER (PRIMARY)

Copy forwarded to the Secretary Establishment Department with reference to his

letter No SoR-1 (ERAD) 1-17/85 dated 07-04-2007.

  
SECTION OFFICER (PRIMARY)

*Abdullah*  


(MUHAMMAD SHAHID ZAMAN)  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY EDUCATION

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL No: 337/2013.

**Ms. Akhtar PET Govt: Girls Middle School Dagar District Karak**

-----Applicant

**VERSUS**

Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar &  
-----Respondents

**PARAWISE COMMENTS/REPLY FOR AND ON BEHALF OF THE RESPONDENTS**

**Respectfully Sheweth:-**

**Preliminary objections**

- 1 The appellant has no cause of action/locus standi.
- 2 The instant appeal is badly time barred.
- 3 The appellant has concealed the material fact from this Hon! able Tribunal hence liable to be dismissed.
- 4 The appellant has not come to Hon! able Tribunal with clean hands.
- 5 The present appeal is liable to be dismissed for non joinder/mis-joinder of necessary parties.
- 6 The appellant has filed the instant appeal on malafide motives.
- 7 The instant appeal is against the prevailing laws & rules.
- 8 The appellant is estopped by his own conduct to file in present appeal.
- 9 The instant appeal is not maintainable in the present form & also in the present circumstances of the issue.
- 10 This Hon !able Tribunal has no jurisdiction to adjudicate the present appeal.
- 11 The present appeal is against the rules & policy specially framed for transfer of civil Servant from FATA to Settled area.

**ON FACTS**

- 1 This Para is related to the service record of the appellant. However, it would not be out of place to mention here that the appellant was appointed against the PST (B-7) i.e the FATA cadre. And the civil servant of BPS-15 and below cannot be transferred from FATA to settled area, as per policy/transfer rules of the teachers from FATA to settled area and vice versa. (Policy Annexed as "A").
- 2 It is pertinent to mention here that the service claimed by the appellant is related to post of BPS-07 i.e PST which is not transferable to any district in settled area of Khyber Pakhtunkhwa, where as PST BPS-7 & BPS-15 is a district cadre post. It would not be out of context to mention here that the posting/transfer of PST teachers are made on Union Council-wise policy hence the transfer of PST teacher or the teachers of BPS-15 and below, should suffer adversely the merit, seniority and  
(contd: next page-2)



quota/strength of post of the Union Council/District. Hence the statement of the appellant in this Para is irrelevant one. The appellant also has not annexed her appointment order as PET in FATA for the reason best known to appellant. However, the appellant was appointed on fixed pay as PET in FATA, as evident from attached/ annexed Service Book at page-15 of the appeal.


- 3 Incorrect. The appellant has violated the Provincial Government policy on the subject. According to the letter of E&SE Department dated 24-4-2007, in the light of the policy decisions regarding from FATA to Settled area, it was directed that :-
- i. NOC, granted by the civil secretariat FATA to teachers up to BPS-15, be cancelled forthwith.
  - ii. If a teacher having domicile of settled area is appointed in FATA and after appointment he intends to come to settled area then he should apply for the post advertised for settle area a fresh and should quit the service from FATA. The present appellant acted against the rules & did not quit the service in FATA and has taken over charge against the PET post in District Karak i.e the settled area. In this Para the appellant intends to misguide/mislead this Hon! able Tribunal by showing illegal NOC etc: hence denied.
- 4 The statement of the appellant in this Para is related to terms & conditions of her appointment as PET in District hence no comments.
- 5 The statement of the appellant in this Para is related to court record and not supported by any documentary proof hence needs no comments. However each case has its own facts.
- 6 As replied in Para-3 above. However, it is pertinent to mention here that her appointment as PET was made strictly in the light of the Government standing rules/policy as annexure "B".
- 7 Incorrect & denied. The appellant has not provided the rejection of her departmental appeal dated 09-12-2011. However , all appeals of the appellant are against the law, rules on the subject, time barred and plotted against the respondents, hence denied.
- 8 As replied in Para-7 above.
- 9 That the respondents prays for rejection/dismissal of the appeal in hand inter alia on the following grounds :-

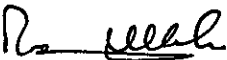
#### ON GROUNDS

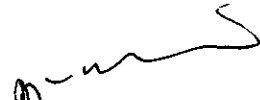
- A Incorrect. The appellant attempted to conceal the material facts from this Hon! able Tribunal. In facts the appellant remained in service on fixed pay against the PET post, hence the statement of the appellant in this Para is mis-leading one, against the facts, law, rules on the subject.
- B Incorrect & not admitted. The appellant has no right to claim entitlement for regularization of service as claimed in this Para.
- C Incorrect and not admitted. The appellant has not fulfilled the codal formalities on the subject and get appointment in settled area against the district cadre post of BPS-9 through back door. And how claiming unlawful benefits hence denied.
- D Incorrect. The statement of the appellant in this Para is misleading one, against the facts and material on record, hence denied.

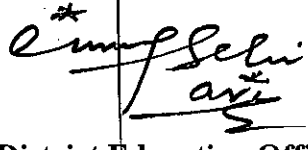
- E Incorrect. The appellant has not been discriminated. The present appeal/pray of the appellant is without any support of law, rules on the subject.
- F Incorrect. The appellant is not entitled to claim the service rendered in FATA cadre posts, in the settled area as per rules & policy of posting/ transfer of teacher in BPS-15 and below from FATA to settled area, for the purpose of pay & pension.
- G Incorrect & not admitted. The statement of the appellant in this Para is manufactured one, baseless against the law & rules on the subject in vogue.
- H Incorrect as already explained above.
- I Incorrect. The appeals of the appellant are time barred and against the rules on the subject.
- J That the appellant seek the permission of this Hon! able Tribunal to adduce more grounds and proofs at the time of arguments.

**In view of the above submission, it is requested that this Hon' able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the respondent Department.**

  
Director  
E&SE Khyber Pakhtunkhwa,  
Peshawar.

  
SECRETARY  
Govt: of Khyber Pakhtunkhwa  
Finance Deptt:  
*Supelt*

  
Secretary  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar

  
District Education Officer,  
(Female) District Karak

GOVERNMENT OF NWFP  
SCHOOL & LITERACY DEPARTMENT  
NO. SO (PE) 2-1/FATA Transfer/Court's Decision/07  
Date: Peshawar The 24/04/2007.

To

1. The Director Schools & Literacy, NWFP, Peshawar.
2. The Director Education FATA, NWFP, Peshawar
3. The Director Curriculum & Teachers Education, NWFP Abbottabad.
4. The Director Provincial Institute for Teachers Education NWFP, Peshawar.
5. All the District Coordination Officers in NWFP.
6. All the Executive District Officers Schools & Literacy in NWFP.

Subject: - POSTING / TRANSFER OF TEACHERS FROM FATA TO SETTLED AREA AND VICE VERSA.

I am directed to refer to the above noted subject and to state that the policy decisions regarding transfer from FATA to settled area and vice versa were circulated to all concerned after obtaining approval of the competent authority vide this department letter of even No. dated 11-05-2006. However it has been noticed that the same are not strictly adhered to/complied with and even now NOCs for transfer are being issued in utter disregard of the standing policy.

2- In order to check this untoward practice the matter was discussed during a meeting chaired by the Secretary Establishment Department on 24-03-2007 and the following decision/recommendations were unanimously agreed to by the participants of the meeting:-

- 1- NOC granted by the Civil Secretariat FATA to teachers upto B-15 be cancelled forthwith.
- 2- The NOCs of teachers in BPS-16 and above be remained intact.
- 3- If a teacher having domicile of settled area is appointed in FATA and after appointment he intends to come to settled area then he should apply for the post advertised for settled areas afresh and should quit his service from FATA.

3- In view of the above it is requested that the above decisions/recommendations may kindly be brought to the notice of all concerned for strict compliance.

(MUHAMMAD AYUB KHAN)  
SECTION OFFICER (PRIMARY)

Copy forwarded to the Secretary Establishment Department with reference to his letter No SoR-1 (E&AD) 1-17-85 dated 07-04-2007.

SECTION OFFICER (PRIMARY)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, ELEMENTARY AND SECONDARY  
 EDUCATION KARAK

APPOINTMENT ORDER

Consequent upon the approval of the District Recruitment/Selection Committee, Karak, the following candidates are hereby appointed against the vacant posts of PET BPS-9 (5820-230-10720) @ Rs.3820/- PM plus usual allowances as due and admissible under the prescribed rules/quota (75% batch wise/year wise and 25% Open Merit) on regular basis with effect from the date of their taking over charge on the terms and conditions mentioned below in the schools noted against each:-

75% Batch Wise Quota (02 Posts)

S.No.	Name	Father's Name	Desig:	Address	Posted at
1.	Naneeeda Akhtar	Israf Khan	PET	CGMS Bazi Khel (FR Kohat)	CGMS Bazi Khel
2.	Shahida Kalsoom	Yaqoob Khan	Fresh	Mir Hawas Banda	CGHS Warana Musakan

25% Open Merit (01 Post)

S.No.	Name	Father's Name	Desig:	Address	Posted at
1.	Azmat Shahin	Ali Hassan	Fresh	Ahmad Abad	GGHS Nari Panos

TERMS & CONDITIONS:

1. No TA/DA etc. is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is subject to the condition that the certificates / documents must be verified from the concerned authorities by the undersigned. If any one found producing bogus certificate, he will be reported to the law enforcing agencies for further action and their services will be considered as automatically dismissed with no privileges of the past if any.
4. Under the provision of Government of N.W.F.P Civil Servant (Amendment) Act, 2005 came into force w.e.f. 23<sup>rd</sup> July, 2005, notified vide Establishment & Administration Deptt (Regulation Wing) Govt. of N.W.F.P No. SO(Regulation)6 (P&AD)1-15/2005 dated 10/08/2005. All the above persons and the persons appointed on regular basis to services are posted in the prescribed manner after the commencement of the said Act shall, for all intents and purposes be a civil servant except for the purpose of pension or gratuity. Such a civil servant shall in lieu of pension and gratuity, be entitled to receive such amount contributed by him towards the Contributory provident fund along with the contribution made by the Govt. to his account in the said fund, in the prescribed manner.
5. If they fail to take over charge within thirty (30) days, the appointment order will be deemed as cancelled.
6. Health & age certificate should be produced from the Medical Superintendent concerned before taking over charge.
7. They are required to produce an affidavit on stamp paper regarding the genuineness of the certificates/degrees submitted by them in response of the advertisement of this office. They should not be allowed to take over charge if they fail to produce the affidavit at the time of their arrival to join the duty to the concerned DDO. The DDOs concerned should counter sign the affidavit and the same should be submitted to the undersigned for record.
8. All the appointees will be entitled for the benefits as admissible to a Civil Servant except Pension & Gratuity.
9. This office will verify their documents from the concerned authorities of their own expenses.
10. The candidates already in regular service shall have to given an option either to retain the benefit of contributory provident fund allowed to him under his new appointment. Under the provision of NWFP Gazette Notification issued vide Provincial Assembly Secretariat No.PA/NWFP/Bills/2009/11/7/1983 dated 28.3.2009.
11. They will remain on probation for a period of 01 year.

(ABULHAMMAD SHAHID ZAMAN)  
 EXECUTIVE DISTRICT OFFICER  
 ELEMENTARY & SECONDARY EDUCATION

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1311 /ST

Dated 6/19 /2014

To,


The EDO,  
E&SE, Department District Karak,

Subject:- APPEAL NO. 337/2013 MST. NAHEED AKHTAR VS SECRETARY  
E&SE AND OTHERS.

I am directed to forward herewith the following order dated 28.08.2014 passed by this Tribunal on the above appeal for strict compliance.

“Counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1, Mosam Khan, AD for respondent No. 4 and Noor Zaman, Principal, GHS Takhti Nusrati for respondent No. 5 with Mr. Muhammad Adeel Butt, AAG for the respondents present. Written reply has not been received on behalf of remaining respondent No. 2, neither rejoinder has been received on behalf of the appellant. On the request of learned AAG, a last chance is given for written reply on behalf of remaining respondent No. 2 and rejoinder on behalf of the appellant. It was pointed out to the respondents that inspite of the fact that respondent No. 5 has made a reference to the order dated 21.12.2011 in the impugned letter/memo dated 18.12.2012, but the same was not placed on file alongwith the written reply of the respondents. A copy of the letter/memo dated 21.12.2011 was obtained from the representative of respondent No. 5 and placed on file. A copy thereof was also provided to the learned counsel for the appellant on his request. Respondent No. 5 be also summoned in person alongwith complete record for further proceedings/written reply on behalf of remaining respondent No. 2 and rejoinder on behalf of the appellant on 26.12.2014.”

Sd/--xxx  
Chairman

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR.

①

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

Rejoinder

In Service Appeal No.337/2013

Mst. Naheed Akhtar PET ..... **Petitioner**

**Versus**

The Secretary Elementary & Secondary Education Department and  
others. .... **Respondents**

**REJOINDER TO THE COMMENTS/PARAWISE REPLY  
FILED BY THE RESPONDENTS.**

---

Respectfully Sheweth:

**Preliminary Objections:**

The entire preliminary objections raised in the reply filed by the respondents are misconceived and based on incorrect facts. The appeal-in-hand has been filed on 23-01-2013 i.e. within 30 days time after communication of the rejection of appeal by the EDO, Karak on 26-12-2013. Beside, appeal in hand purely relating to the fixation of pay, allowances and pensionary benefits had a continuous cause of action for which there is no period of limitation. Appeal could not be thrown away as time-barred on this ground only. Reliance is placed on 2006 PLC (C.S) 1124.

**ON FACTS:**

1. Para-1 of the appeal has wrongly been understood and replied therein by the respondents. The Services of the appellant has

not been transferred from FATA to settled area, rather appellant had applied to the post of PET afresh after advertisement published by the EDO Karak and through proper channel appellant applied to the said post and was thus selected by the Selection Committee. The appeal-in-hand prayer of the appellant is/was for counting previous regular service as a PET for the purpose of pay & pension and it has no nexus with the transfer from FATA to Settled area against the policy decision.

2. Para-2 of the para-wise reply is again misleading. Appellant claim through appeal in hand for the purpose of counting previous regular service and nothing else, which can be vividly claimed under fundamental service rules. The appellant having domicile of District Kohat was initially appointed as a PST teacher and was regularized as such and thereafter she was appointed/promoted to the post PET on the basis of acquiring qualification. (Copy of the appointment order as PET Teacher and Service Book are enclosed as Annex-A & A/1 for ready reference in order to meet the objection raised by the answering respondents).
3. The policy cited above by the answering respondents is neither relevant nor applicable to the appellant. The answering respondents does not understand the case of appellant, therefore, hence wrongly rejected the appeal of the appellant.
4. No comments had been advanced, hence needs no rejoinder.
5. Appellant will produce similar cases in which relief has been granted even by the respondents and even by this Hon'ble Tribunal at the time of arguments.

6. The appointment of the appellant has been accepted by the answering respondents strictly in accordance with the law in corresponding para of the appeal. But it is strange enough, that appellant applied through proper channel in which NOC, Last drawn Pay Certificate as PET teacher and on top of which Service Book was provided which is only maintained for regular employee and not otherwise. The service Book entry as a PET teacher as ample proof of previous regular service in which appellant is claiming through instant appeal.
7. Para-7 of the reply is distortion of facts, hence, denied. Appellant clearly mentioned in the appeal that earlier rejection of appeal, dated, 9-12-2011 was not communicated to the appellant and therefore appellant again made representation, dated, 18-12-2012 in which on top of it was mention that earlier similar appeal was dismiss and filed in which appellant had no knowledge. Therefore the final order will be considered from the final order i.e. 26-12-2012 and not from earlier rejection order.
8. No reply, hence, needs no rejoinder.
6. That the Appellant rightly approach before this Hon'ble Tribunal fro the purpose of counting previous regular service and it is not case of transfer from the FATA to Settled area on the basis of which departmental appeal has been rejected as projected by the answering respondents throughout.



**GROUND:**

All the grounds were evasively attended, hence needs no rejoinder, however, this Hon'ble Tribunal is aware of the facts and the law that policy decisions cannot prevail/override the express provision of law and rules.

It is, therefore, requested that this Honorable Court may kindly be pleased to allow the appeal-in-hand and counted the previous regular service for the purpose of pay and pension and other allied benefits.

Any other relief which was not specially asked for may also be granted in the interest of justice.

Your humble petitioner

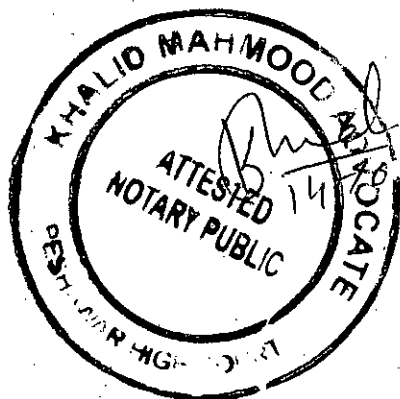
Through Counsel

(FARMAN ULLAH KHATTAK)

Advocate, High Court, Peshawar.

**AFFIDAVIT:**

I, Farman Ullah Khattak Advocate, Peshawar, do hereby solemnly declare and affirm on oath that the contents of this Rejoinder are true and correct to the best of my knowledge and instruction of my client and that nothing has been concealed from this Honorable Court.



ADVOCATE

5

OFFICE OF THE AGENCY EDUCATION OFFICER, F. R. KOHAT.

UP-GRADATION OF SCALE BPS-15

Sanction is hereby accorded in BPS-15 in respect of Naheed-Akhtar PET, GCMS, Bazi Khel, FR. Kohat vide Finance Department Notification No. FD/50(FR)10.22.2007 Vol:II dated 12.11.2008 endorsed by DE, FATA, NWFP, Peshawar No.696-718 dated 17.1.2009 in the interest of Public service.

Note:-

Necessary entry to this effect should be made in her S/Book.

*sd/v*  
(ASMAT KHAN AFRIDI)  
AGENCY EDUCATION OFFICER,  
F. R. KOHAT AT K. D. A. KOHAT.

Endst: No. 1068-71 / AEO, FR. Kohat Dated the 28/3 / 2009.  
Copy to the:-

1. Director of Education, FATA, N. W. F. P. Peshawar.
2. District Accounts Officer, Kohat.
3. AAO(F) Local Office.
4. Accountant Local Office.

*m*  
AGENCY EDUCATION OFFICER,  
F. R. KOHAT AT K. D. A. KOHAT.  
*mm*

6

GOVERNMENT OF PAKISTAN  
ACCOUNTANT GENERAL  
DISTRICT  
KOHAT

SN: 1555

P Sec: 001 Month: April 2007  
KT0065 - AGENCY EDU OFFICER (FR) 80  
Min: Min. Of Education  
NTN: 0  
GPF #: 4E0KT005910  
Old #: 10293002011

Pers #: 00164502 Duckle: 0  
Name: NAHEED AKHTER  
Dsg.: P. E. T.  
NIC No.: 14393002011  
GPF Interest Applied

PAYS AND ALLOWANCES:		KT0065	-8
0001-Basic Pay		7,200.00	
1000-House Rent Allowance		1,476.00	
1300-Medical Allowance		500.00	
1528-Unattractive Area Allow		75.00	
1770-Spl. Additional allowance		401.00	
1830-Special Relief All(2005)		537.00	
1831-Adhoc Relief (2005)		537.00	
1864-Earnes Allowance (2006)		700.00	
1865-Teaching Allowance (2006)		750.00	
Gross Pay and Allowances		12,178.00	
DEDUCTIONS:			
GPF Balance	590,727.00		
4505-GPF Loan Principal Instal	Mal: 61,400.00	Subtr:	620.00
4200-Professional Tax			1,800.00
3661-E. E. F (Exchange)			100.00
3701-Benevolent Fund(Exchange)			20.00
3704-Group Insurance(Exchange)			35.00
3711-Addl Group Insuranc(Exch)			75.00
			13.00
Total Deductions			2,663.00
		NET AMOUNT PAYABLE	9,515.00

QUALIFYING SERVICE			
YRS	MON	D. D. D	LFP Quota:
16 Years 02 Months 001 Days		13.02.1969	GPF WDA
			S 2047-1
			K. S. A (KOHAT DEV: 407)

7

**DOMICILE CERTIFICATE.**

I declare that I am born of parents, who are permanently domiciled in N.W.F.P., having born in this Province.

I was born at Jungle Khel Kohat

Signature Nabeel Akhter  
Resident of Moh Pir Taimur Shah Jungle Kohat  
Tehsil Kohat  
District Kohat

Dated 22-11-50

In pursuance to the declaration, dated 27th September 1988  
Nabeel Akhter <sup>Daughter</sup> Israf Khan  
<sub>son of</sub>  
Kohat Tehsil: Kohat District: Kohat

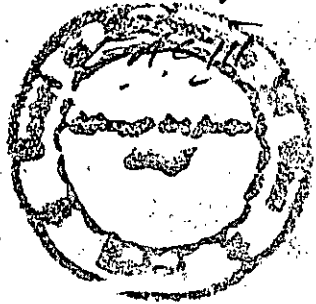
to the effect that he has been born of parents, who are permanently domiciled in N. W. F. P.

It is hereby certified that the said Nabeel Akhter parents are permanent residents of N. W. F. P., having been born within it.

I have satisfied myself from my own ~~knowledge~~ by verification through N. Tarsiler that ~~the above declaration is true and certify accordingly.~~

Given under my hand and that the seal of the Court of, this 23 day Nov 1988

Nabeel Akhter  
Magistrate Ist Class Kohat  
Taimur Khan Jadoore



COUNTERSIGNED.

Nabeel Akhter  
Deputy Commissioner, Kohat.

22/11/88

No. 2257 D.,  
Dated 27/11 19 88

میرا لکڑی دستاویز اساتذہ خانہ کتبہ  
 کوئی ایسی عذر نہیں دے سکتے ہیں، تاہم اس وقت  
 درج ذیل عذر دیا گیا ہے کہ اس وقت  
 یہ لکڑی دستاویز اساتذہ خانہ کتبہ  
 کے پاس نہیں ہے۔

Malak Ullah  
 COUNCILLOR  
 M.C. KOHAT

Chairman  
 Municipal Committee, Kohat

Dilafroz Begum  
 DIL AFROZ BEGUM  
 Councillor  
 Municipal Committee Kohat

Musamat Khan  
 Malik Ghimat Khan  
 COUNCILLOR  
 Ward No. 15, M.C. Kohat

میرا لکڑی دستاویز اساتذہ خانہ کتبہ  
 کوئی ایسی عذر نہیں دے سکتے ہیں، تاہم اس وقت  
 درج ذیل عذر دیا گیا ہے کہ اس وقت  
 یہ لکڑی دستاویز اساتذہ خانہ کتبہ  
 کے پاس نہیں ہے۔

میرا لکڑی دستاویز اساتذہ خانہ کتبہ  
 کوئی ایسی عذر نہیں دے سکتے ہیں، تاہم اس وقت  
 درج ذیل عذر دیا گیا ہے کہ اس وقت  
 یہ لکڑی دستاویز اساتذہ خانہ کتبہ  
 کے پاس نہیں ہے۔

27/88  
 033889-056-143  
 میرا لکڑی دستاویز اساتذہ خانہ کتبہ  
 کوئی ایسی عذر نہیں دے سکتے ہیں، تاہم اس وقت  
 درج ذیل عذر دیا گیا ہے کہ اس وقت  
 یہ لکڑی دستاویز اساتذہ خانہ کتبہ  
 کے پاس نہیں ہے۔

میرا لکڑی دستاویز اساتذہ خانہ کتبہ  
 کوئی ایسی عذر نہیں دے سکتے ہیں، تاہم اس وقت  
 درج ذیل عذر دیا گیا ہے کہ اس وقت  
 یہ لکڑی دستاویز اساتذہ خانہ کتبہ  
 کے پاس نہیں ہے۔

704  
 E-149  
 23-11-88

Attest  
 Suwaa  
 AIT Kohat  
 23/11/88

**BEFORE THE PESHAWAR HIGH COURT PESHAWAR**

In

Service Appeal No.337/2013

Mst. Naheed Akhtar PET .....Petitioner

**Versus**

The Secretary Elementary & Secondary Education Department and  
others. ....Respondents.

**APPLICATION FOR IMPLEADMENT OF**

**(1) Agency Education Officer, FR Kohat at KDA, Kohat.**

**(2) District Accounts Office, FR Kohat at KDA, Kohat.**

**In the panel of respondents of above captioned noted  
Service Appeal under order-1 rule-10 CPC and other  
enabling provision of law being necessary and proper party.**

---

Respectfully Sheweth:

1. That the above noted Service Appeal is filed by the appellant for counting previous regular service as a PET in FR Kohat, which is fixed for arguments before this Hon'ble Tribunal in which next date of hearing has been fixed on 15-07-2016.
2. That indeed appellant was already in regular service over the post of PET in F.R Kohat, when, she applied to the post of PET afresh through proper channel and was thus selected by the Selection Committee at Karak. Hence the application in hand for impleadment is very much necessary in the captioned Service Appeal.
3. That appeal-in-hand prayer of the appellant is/was for counting previous regular service as a PET for the

purpose of pay & pension and it has nexus with the transfer of G.P. fund etc from the District Accounts Office Kohat to District Accounts Karak and further to provide record of length of service as a PET for the purpose of counting pension benefits and pay protection for which their impleadment is very much necessary.

It, is, therefore most humbly prayed that this Honorable Tribunal may kindly be pleased to allow the application for impleadment and they may be impleaded in the panel of respondents of the above noted Service Appeal, in the interest of justice.

Your humble applicant/Appellant

Through counsel

(FARMAN ULLAH KHATTAK)  
Advocate High Court, Peshawar.

**AFFIDAVIT**

I, Farman Ullah Khattak Advocate, Peshawar, do hereby solemnly declare and affirm on oath that the contents of this Application for impleadment are true and correct to the best of my knowledge and instruction of my client and that nothing has been concealed from this Honorable Court.

Deponent.

**ATTESTED**  
Oath Commissioner  
Zafar Khan Advocate  
Distt: Court Peshawar

15/2/16

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

F-13-11

No.

APPEAL No. 337 of 20 13.

*Regd*

*Ms. Nabeed*

Appellant/Petitioner

Versus

*Through Secy: Education K.P.S.D.Ni*  
RESPONDENT(S)

Notice to Appellant/Petitioner

*Ms. Nabeed Akhtar*

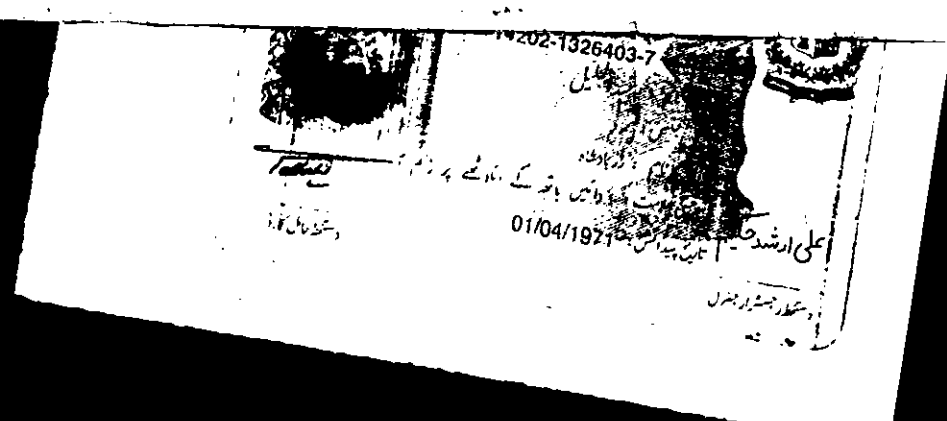
*Physical Education Teacher*

*(PET) Govt. Girls Middle School  
Dagar Nari Distt. Karak.*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15-8-2017 at 8:00 A.M.

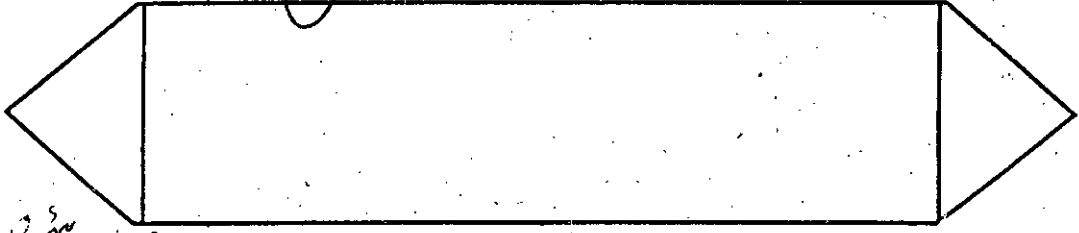
You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.





بعدالتذکرہ - سر ایس آر بیرون خلیفہ خدیوہ العیادہ



2013ء پنجاب ہائی کورٹ  
مسماہ ناصر اختر بنام گورنمنٹ و غیرہ

مورخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام لیسٹیاہ کیلئے قرآن الدوکتب اور کتب  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثبات ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
اسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
رر ایس پر دستخط کرانے اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ اتوائے مقدمہ کے سبب سے وہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 23 ماہ جنوری 2013ء

العبد

بمقام لیسٹیاہ کے لئے منظور ہے۔

Accepted  
[Signature]

بمقام لیسٹیاہ

ناصر اختر