

Appeal No. 670/2013.
Mr. Ghulam Ali

09.09.2013

Clerk of counsel for the appellant present and moved an application for adjournment. Case is adjourned. To come up for preliminary hearing on 22.10.2013.



Member

22.10.2013

Counsel for the appellant present and requested for withdrawal of the appeal alongwith connected appeals with permission to file fresh one. Request is accepted and the appeal is dismissed as withdrawn in limine with permission to file fresh one subject to all legal objections. File be consigned to the record.

ANNOUNCED
22.10.2013.


Member

3.
13.5.2013

Counsel for the appellant present and requested for adjournment. Case adjourned to 5.6.2013 for preliminary hearing.


Member.

4.
5.6.2013

Munshi to Counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 15.7.2013.


Reader

5.
15.07.2013



Clerk of counsel for the appellant present and requested for adjournment. Case is adjourned. To come up for preliminary hearing on 09.09.2013.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 670/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	12/04/2013	<p>The appeal of Mr. Ishrat Ali resubmitted today by Mr. Khan Akbar Khan 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	15-4-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>13-5-2013</u></p> <p style="text-align: right;"> CHAIRMAN</p>

This is an appeal filed by Mr. Ishrat Ali today on 08/04/2013 against none granting of seniority of untrained period against which he preferred a departmental appeal on 27/03/2013 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action with also removing the following deficiencies.

- 1- The authority to whom the departmental appeal was made/preferred has not been arrayed party.
- 2- Copy of impugned seniority list is not attached with the appeal which may be placed on it.
- 3- In the memo of appeal many places have been left blank which may be filled in.

No. 582 /ST,

Dt. 09/04 /2013

Leone
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

MR. KHAN AKBAR / KHAN ADV. PESH.

Sir, since it is a recurring cause of action, therefore in view of the judgment of this H. Tribunal accepted with the judgment of the H. S. Court of Pakistan - the question of limitation is not applicable. Secondly, the D.E.O Mardan has been arrayed as respects this. We submit that our untrained period should be counted towards our service and we do want seniority as such need of filing S. list.

K. Akbar
Pesh. Advocate

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON

KHWA, PESHAWAR.

Service Appeal No 670 /2013

Ishrat Ali.....Appellant

VERSUS

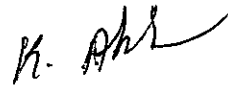
Govt of K P K through Secretary & others.....Respondents

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service appeal		1-5
2.	Application for Interim relief.		6-7
3.	Affidavit		8
4.	Copy of appointment order	"A"	9
5.	Copy of Certificate PTC course	"B"	10
6.	Copy of relevant page of service book regarding regularization	"C"	11
7.	Copy of Office Order dated 30.10.2009	"D"	12-13
8.	Copy of acknowledgement receipts regarding personal representation	"E"	14
9.	Wakalat Nama		15


Appellant

Through



(KHAN AKBAR KHAN)

Advocate, Peshawar.

107-B, Town Tower, Jahangir

Abad, University Road,

Peshawar.

Cell No: - 0344-9111911

Dated:-05-04-2013

Office: -

Cell No: -

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON

KHWA, PESHAWAR.

Service Appeal No 670/2013

697
08-4-13

Ishrat Ali, Primary School Teacher (PST), Government Primary School, Zando Dheri, Tehsil and District Mardan

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Peshawar through its Secretary.
2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.
3. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. Executive District Officer Elementary & Secondary Education Mardan.....Respondents

=====

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTON KHWA, SERVICE TRIBUNAL ACT, 1974 TO
THE EFFECT THAT UNTRAINED PERIOD OF THE
APPELLANT MAY KINDLY BE COUNTED TOWARDS HIS
SERVICE AND THE FRESH SENIORITY LIST MAY
PLEASE BE PREPARED ACCORDINGLY.**

=====

PRAYER IN APPEAL.

Filed to-day
12/4/13

On acceptance of this appeal the untrained period of the appellant may kindly be counted towards service of the appellant and fresh seniority list may kindly be prepared accordingly.

**re-submitted to-day
and filed.**

12/4/13
Registrar

Respectfully Sheweth:-

1. That the appellant was appointed in the Education Department, as Untrained Primary School Teacher (PTC) on fixed pay on dated 01.04.1990 and is still serving on the said post with full zeal and

Respectfully Sheweth:-

1. That the appellant was appointed in the Education Department, as Untrained Primary School Teacher (PTC) on fixed pay on dated 01.04.1990 and is still serving on the said post with full zeal and devotion. (Copy of appointment order is attached herewith as **Annexure "A"**).
2. That the appellant has got at his credit on the above said post a long tenure of service extending over 23 years.
3. That later on the appellant on dated 05.03.1994 passed the Primary School Teacher Certificate course from Allama Iqbal Open University. (Copy of the Certificate of Primary School Teacher Certificate is attached herewith as **Annexure "B"**).
4. That after passing the said Course the appellant was regularized against his post and allowed the graded/running pay scale in BPS-07 with effect from the date of passing the said course, i.e. 05.03.1994; vide Endst No.494-95 dated 06-02-1995. (Copy of the relevant Page of the service book is attached herewith as **Annexure "C"**).
5. That the on dated 30.10.2009, the Finance Department vide office order No. FD (PRC) 5-2/2002 allowed all benefits of annual increment from the date of first appointment to all untrained teachers. (Copy of the office order dated 30.10.2009 is attached herewith as **Annexure "D"**).
6. That previously a seniority list was prepared by the Education Department for District Mardan, on the basis of initial appointed in which petitioner was placed at serial No....., whereas in the early December 2012, the respondent Department issued a tentative seniority list, wherein the appellant has been placed at serial

No.....thus thereby ignoring his untrained period of more than 4 years.

7. That now the respondent Department is not ready to count the untrained period of more than 4 years of the appellant towards his service in utter disregard of dictum laid down by the superior courts in this behalf.
8. That against that said act and action of the respondent department the appellant also moved his representation to the concerned authority on dated 15.12.2012, but no response was given by them. (Copies of acknowledgement receipts are attached herewith as **Annexure "E"**).
9. That the appellant along-with his other colleagues having their services extending from 20 to 40 years of spotless character and they have rendered valuable services and have performed their duties with zeal and devotion. But the respondents have totally deprived them from the period spent by them as untrained teachers.
10. That this attitude of the respondent department to deprive the appellant from the untrained period of service is without any cogent/legal grounds but just to give benefit to the blue eyed teachers of the respondent department, whom have been appointed in their tenure.
11. That the appellant has got no other efficacious remedy available to him but to approach this Honourable Tribunal on the following ground inter-alia.

GROUND.

- A. That act of the respondent department, thereby depriving the appellant from the above said benefit of Seniority is illegal, unlawful

without authority/ jurisdiction, as well as being based on malafide intentions of the respondent department is liable to be set aside.

- B. That at the time of appointment of the appellant, the respondent Department had no trained teachers, hence the appellant was appointed on fixed pay.
- C. That after appointment of the appellant as PST, there was neither any time limit for completing the desiring course of Primary School Teacher Training course nor was there any special program from Respondent Department.
- D. That it is pertinent to mention here that the said untrained period of the appellant is counted in the retirement period as the same is granted on the basis of date of initial appointment.
- E. That since hundred and hundreds of the teachers have been treated in a discriminatory manner and have been deprived of the above said benefit without any just cause.
- F. That the appellant has been serving on the above said post since long, whereas the minimum tenure of service amongst the appellant and his colleagues is 17 years and the maximum tenure amongst them is extended to 24 years, but they have been treated unlawfully without any cogent/solid grounds.
- G. That the said act of the respondent department is not merely illegal as well as unlawful, but is also against the very clear Article of Constitution of Islamic Republic of Pakistan as engraved in the basic rights of said constitution.

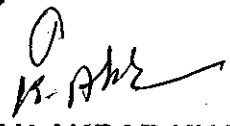
It is, therefore, prayed that on acceptance of this Service Appeal, the respondent may please be directed to count the untrained period of the appellant towards his service and they may further be directed to prepare a fresh seniority list on the basis of initial appointment of the appellant.

5

Any other remedy to which appellant is found entitled,
in the peculiar circumstances of the case may also be granted.


Appellant

Through

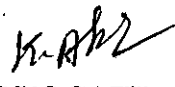


Dated: -05-04-2013

(KHAN AKBAR KHAN)
Advocate, High Court,
Peshawar.

CERTIFICATE:

Certified that as per information furnished by my client no such like service
appeal on the subject has earlier been filed in this Hon'ble Tribunal.


ADVOCATE

7

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON
KHWA, PESHAWAR.

C.M No. _____ 2013

In

Service Appeal No _____/2013

Ishrat Ali.....Appellant

VERSUS

Govt of K P K through Secretary & others.....Respondents

=====

***APPLICATION FOR TEMPORARY INJUNCTION TO THE
EFFECT THAT RESPONDENT MAY KINDLY BE
RESTRAINED FROM TAKING ANY ACTION OVER THE
TENTATIVE SENIORITY LIST, TILL THE FINAL DESICION
OF THE MAIN APPEAL.***

=====

Respectfully Sheweth:

1. That the appellant has filed the above titled service appeal before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That respondent has prepared a seniority list in which the untrained period of more then 4 years of the appellant has not been counted towards his service.
3. That the applicant/appellant has very prima facie cause of action and is very hopeful of its ultimate success of his appeal.
4. That all the three ingredients i.e. prima facie case, balance of convenience and irreparable loss as per spirit of the rules for

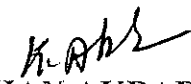
granting injunction is of the applicant/appellant are present in the said appeal.

5. That in case the injunction as prayed for above is denied, the applicant/appellant will suffer irreparable loss as the impugned. Hence, it is in the interest of justice to stay further proceedings on the impugned notification, till the final decision of this Honourable Tribunal.
6. That there is no legal bar in granting the injunction as prayed for above.
7. That the facts and grounds taken in the memo of appeal may kindly be considered as part and parcel of the instant application.

It is, therefore, humbly prayed that in the light of above said submissions this Honourable Tribunal may please be kind enough to restrain the respondent from taking any action over the tentative Seniority list till the finalisation of the main appeal.


Applicant

Through


(KHAN AKBAR KHAN)
Advocate,
High Court, Peshawar.

Dated: -05-04-2013

8

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOON
KHWA, PESHAWAR.

Service Appeal No _____/2013

Ishrat Ali.....Appellant

VERSUS

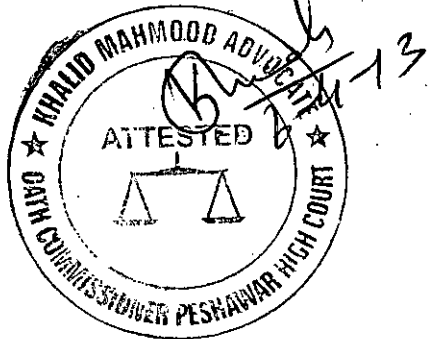
Govt of K P K through Secretary & others.....Respondents

AFFIDAVIT

I, Khan Akbar Khan Advocate, as per instruction of my client, do hereby solemnly affirm and declare on Oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

Khan Akbar Khan

Deponent



Phone No. 2006.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.
APPOINTMENT:-

Appointment of the following Persons is/are hereby ordered against the Post of PTC (U/T) on temporary and adhoc basis @Rs. 750/- P.M. Fixed plus usual allowances as admissible under the rules in BPS No. 22(7) ~~xxxxxxx~~ pay and grade with immediate effect in the interest of public service in the schools noted against each:-

<u>S.No.</u>	<u>Name Qualification/Address.</u>	<u>Posted at.</u>	<u>Remarks.</u>
1:-	Mr. Ishrat Ali s/o Jafdar Ali r/o Qayum Abad (Toru) Tehsil & District Mardan.	GPS, Zande Dheri.	A.V. Post.
		-/-/-/-/-/-/-/-/-/-/-/-	
		-/-/-/-/-/-/-/-/-/-/-/-	

CONDITIONS OF APPOINTMENT:-

- 1:- His/Their Services is/are liable to termination/reversion at any time without any reason being assigned.
- 2:- In case of resignation He/They will have to submit One Month's prior notice to the Deptt: or forfeit One month's pay in lieu thereof to Government.
- 3:- He/They should not be allowed to take over charge if his/their age is/are less than 18 years and above 25 years.
- 4:- He/They is/are required to produced Health and Age Certificate from Medical Supdt: D.H.Q. Hospital Mardan before taking over charge.
- 5:- Charge report should be submitted to all concerned.
- 6:- If they/He fails to take over charge of the post within 14 days after the issue these orders ther of appointment shall stand cancelled.
- 7:- Certificates should be Checked before handing over charge.

(AZIZ AHMAD KHAN)
DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.

Endst: No. 9310-8 /E-II/PTC/apptt: /A.R.K./Pcc:/ dated 1.4.1990.

- Copy of the above is forwarded for information & n/action to the:-
- 1:- P.S. ~~xxxxxxx~~
 - 2:- S.D.E.O. (Male) Mardan/Takht Bhai.
 - 3:- Candidate Concerned.

DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.

10

Annexure (B)

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

۱۹۹۳

علامہ اقبال اوپن یونیورسٹی اسلام آباد

رول نمبر 6083707

نمبر شہد 36712



پرائمری ٹیچر سرفیکلیٹ کورس

سمسٹر بہار 93 19

تصدیق کی جاتی ہے کہ مستحق امتحان / مشرت طبعی
رجسٹریشن نمبر 91- ایم ایم ایم - 0334 ولد/بنت صفدر طبعی
ساکن / ضلع مردان حال معلم / معطر xxxxxx سکول xxx
ضلع xxx صوبہ سرحد نے بی ای کورس کامیابی سے پاس کر لیا ہے۔
حاصل کردہ نمبر (فیصد) 50 گریڈ سی

مراستہ کورس (بی-ٹی-سی-I) xx
عملی تربیت (بی-ٹی-سی-II) xx
مجموعی حاصل کردہ نمبر xx

مورخہ 5 مارچ 1994ء
تیار کنندہ
پڑھانے والے

محمد
محمد
۱۹۹۴

ALLAMA IQBAL OPEN UNIVERSITY
ISLAMABAD

9	10	11	12	13		14	15
				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 and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
<i>[Signature]</i> S. D. E. O. MARDAN	31/5/91	Pay Revised	<i>[Signature]</i> S. D. E. O. (M) MARDAN				
						Appointed against P.T.C post as untrained teacher @ Rs. 750/Pm fixed vide DEO (M) Mardan office Endst/NO 9310-G/E-11 PTC/AMH/ABK/Rec Dated 1-4-90	
<i>[Signature]</i> S. D. E. O. (M) MARDAN	31/5/94	Pay Scale Revised	<i>[Signature]</i> S. D. E. O. MARDAN			Sub Div: Edu. Officer MARDAN	
						Sanctioned medical leave w/c from 1-9-90 to 4-9-90 (4 days) on full pay w/c from 5-9-90 to 15-9-90 (11 days) without pay vide DEO (M) Mardan office Endst/NO 20809 E-11/L. File/PTC Dated 22-12-90	
<i>[Signature]</i> S. D. E. O. MARDAN	4/3/94	Pay Revised	<i>[Signature]</i> S. D. E. O. (Male) Mardan			Sub Div: Edu. Officer MARDAN	
<p>Office of The Accountant General, N.W.F.P. Peshawar Pay fixed in the revised basic pay scale of Rs. 1,200-2,650-7 @ Rs. 480 P.M. with next increment 0.1 1-12-1994</p> <p>Accounts Office, Pay Fixation Peshawar</p>							<p>Service verified w/c of 10-4-90 to 30-11-90 other records in this office.</p> <p>S. D. E. O. Mardan</p>
<i>[Signature]</i> S. D. E. O. (Male) Mardan	31/5/94	Pay Revised	<i>[Signature]</i> S. D. E. O. (Male) Mardan			Service verified w/c of 1-12-91 to 30-11-93 other records in this office.	
<i>[Signature]</i> S. D. E. O. (Male) Mardan	30/11/94	Annual increment	<i>[Signature]</i> S. D. E. O. (Male) Mardan			Revised superannuation eighty vide challan No. 19 of 14-9-93	
<i>[Signature]</i> S. D. E. O. (Male) Mardan	17/4/95	Entires Revisal	<i>[Signature]</i> S. D. E. O. MARDAN			Sub Div: Edu. Officer MARDAN	
<i>[Signature]</i> S. D. E. O. (Male) Mardan	31/5/94	Pay Revised	<i>[Signature]</i> S. D. E. O. MARDAN			Allowed graded pay scale in Rs 1500-2100-60-1995 w/c of 5-5-94 vide DEO (M) Mardan Endst/NO 62/95	

Sub Div: Edu. Officer. ?

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. 37 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term 'Pay'	7 Date of payment	8 Signature of Government servant
P.T.C		BPS No: 7(1480-87-2695)					
P. GPS Fendo Dhen	off/sub.		Rs 1642/-	✓		1 ⁶ / ₉₄	Ashraf Ali
- do -	- do -		Rs 1723/-	✓		1 ¹² / ₉₄	Ashraf Ali
- do -	do		1804/-	✓		1 ¹² / ₉₄	Ashraf Ali
- do -	- do -	FA	Rs 1805/-	✓		1 ¹² / ₉₆	Ashraf Ali
<p>② Adv. increments in Office of The Accountant General, N.W.F.P. Peshawar pay fixed in the revised basic pay scales 1994 of Rs 1480-87-2695 (B. 7) ③ Rs. 1642/- N.W.F.P. 1-6-1994 with next increment on 1-12-1994</p>							
<p>Bank copy Accounts Office, Pay Fixation Party N.W.F.P. Peshawar</p>							
- do -	- do -		Rs 1966/-			1 ¹² / ₉₇	Ashraf Ali
S.P.S. Sowayan	do		Rs 2047/-	✓		1 ¹² / ₉₈	Ashraf Ali
- do -	- do -		Rs. 2128/-			1 ¹² / ₉₉	Ashraf Ali
- do -	- do -		Rs. 2209/-			1 ¹² / ₂₀₀	Ashraf Ali

(12) Annote (D)

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

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

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

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

Dear Sir,

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

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

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

Yours Faithfully,

(SHAUKAT ULLAH)
SECTION OFFICER (SR-1)

Endst: of even No. & date.

Copy for information and necessary action:-

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

SECTION OFFICER (SR-1)



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

13

NO.FD (PRC) 5-2/2002
Dated Peshawar the: 30-03-2009

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

3222
7-4-09

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

Dear Sir,

I am directed to refer to your letter NO.SO (B&A). 1-16/08/
Advance Increment dated February 27, 2009 on the subject noted above and
to state that the Provincial Government is pleased to allow the benefit of
annual increments to the untrained teachers from the date of their regular
appointment.

No arrears shall however, be admissible / payable prior to the
date of issuance of this circular.

(ABDUL JABBAR)
SECTION OFFICER (SR-I)

Endst: of even No & date.

Copy for information & necessary action to the:

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

SECTION OFFICER (SR-I)

HRDO/EA

pl sent a copy to
Edn Deptt. 1.02
DCO HRDO F&S

10/02

HRDO
EA

Handwritten signature/initials

درخواست برادرج سناری لست 2012ء ضلع مردان

(بحوالہ: تاریخ آغاز ملازمت کو بنیاد بنانا جائے)

- مندرجہ ذیل گزارشات گوش گزار کرنے کی سہی ہے امید باور ہے شہنوائی و کاروائی حسب استدعا عمل میں لائی جائے گی۔
- (۱) یہ کہ سائل محکمہ تعلیم خیبر پختونخوا میں بحیثیت بی ایس ٹی مورخہ 1-4-1990 گورنمنٹ پرائمری سکول زنگو ڈھیری (مردان) میں تعینات ہوا تھا۔ اور دم تحریر اپنی ذمہ داری بطریق احسن انجام دے رہا ہوں۔
- (۲) یہ کہ گزشتہ سناری لست ضلع مردان کو قاریخ آغاز ملازمت کی بنیاد پر تیار کیا گیا تھا جس میں سائل کا نمبر 1157 تھا۔
- (۳) یہ کہ موجودہ ضلعی سناری لست 2012ء میں ان ٹریڈ پیریڈ کو شمار نہیں کیا گیا۔ جس میں سائل کا سناری لست نمبر 1505 ہے۔
- (۴) یہ کہ مذکورہ ان ٹریڈ پیریڈ کے سالانہ انگریمنٹ اور بقایا اجات سائل کو ای ڈی او (ای اینڈ ایس) ایجوکیشن مردان بذریعہ چھٹی نمبر 2/2002 FD(PRC)5 مورخہ 30-10-2009 ادا کر دی گئی ہیں۔
- (۵) یہ کہ سناری لست 2012ء میں تاریخ آغاز ملازمت کو خاطر میں نہ لاتے ہوئے مرتب کرنا سراسر خلاف ضابطہ و قانون اور انصاف کے تقاضوں سے متصادم ہے۔ اور سائل کی حق تلفی بھی ہے۔

لہذا آپ صاحبان سے گزارش ہے کہ مذکورہ ضلعی لست 2012ء کو کالعدم قرار دیتے ہوئے تاریخ آغاز ملازمت کو بنیاد

بنا کر مرتب کیا جائے۔

مورخہ: 27-3-2013

العارض

عشرت علی

نام

بی ایس ٹی

پوسٹ

گورنمنٹ پرائمری سکول سواڑمان

سکول

بشرف ملاحظہ:

(۱) سیکرٹری ایجوکیشن خیبر پختونخوا

(۲) ڈائریکٹر ایجوکیشن خیبر پختونخوا پشاور

(۳) ڈی ای او ضلع مردان

جناب عالی
برائے مناسب کارروائی موصول
حضرت



WAKALATNAMA

BEFORE THE COURT OF Service Tribunal - K.P.K. Peshawar,

No _____ of 2012

Ashraf Ali

(Petitioner)

(Plaintiff)

(Appellant)

VERSUS

GOVT. OF K.P.K. THROUGH SECRETARY.

(Respondent)

(Defendant)

I/We Ashraf Ali

In the above noted Service - Appeal do hereby appoint and constitute **Mr. Khan Akbar Khan** Advocate as my/ our Counsel in the subject proceedings and authorize him to appear, plead etc compromise, withdraw or refer the matter for arbitration for me/ us without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel at our/my expense and receive all sums and amounts payable to us/ me and to all such acts which he may deem necessary for protecting my/ our interest in the matter. He is also authorized to file Appeal, Revision, Application for restoration or application for setting aside ex parte decree proceedings on my/ our behalf.

Dated: - 08/04/2012

Ashraf Ali

(Client)

K. Akbar
(KHAN AKBAR KHAN)

Advocate, High Court, Peshawar.

Office Address: - B-107, Town Tower

Jahangir Abad, University Road, Peshawar.

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عشر علی