

25.07.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Arshid Ali ADEO for respondents present.

A request was made for adjournment on behalf of respondents. Last chance on payment of cost of Rs.2000/- is given to the respondents for submission of reply. Failing which, their right of submission of comments would be deemed as struck off. To come up for reply/preliminary hearing on 11.10.2022 before S.B.



(Rozina Rehman)  
Member (J)

11.10.2022

Junior to counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General for respondents present.

Reply on behalf of respondent No. 3 have already been submitted. Despite last chance Respondents No. 1 & 2 failed to submit written reply, hence their right for submission of written reply is struck off and placed ex-parte. Adjourned. To come up for arguments on 12.12.2022 before D.B.



(Fareeha Paul)  
Member (E)

16430/20


04.01.2022

Counsel for the appellant present.

Pre-admission notice be issued to the respondents. Appellant is also directed to produce the copies of appointment orders as Naib Qasid and then as Process Server as directed on 02.06.2021. To come up for reply/preliminary hearing on 01.03.2022 before S.B.

  
(Rozina Rehman)  
Member (J)

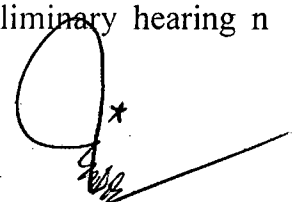
1-3-2022

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30-5-2022  
  
Reader

30.05.2022

Appellant with counsel present. Mr. Kabirullah Khattak, learned Addl. AG for the respondents present.

Written reply/comment on behalf of respondents not submitted. Previous date was changed on the strength of Reader note! therefore, notice be issued to the respondents for submission of written reply/comments. To come up for written reply/comments as well as preliminary hearing on 25.07.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

02.06.2021

Counsel for the appellant present.

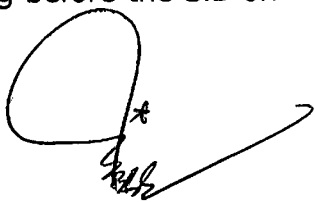
The matter was argued at certain length but in absence of copies of appointment orders of the appellant as Naib Qasid and then as Process Server are not available. The appellant is directed to document the appeal by production of these documents. To come up for preliminary hearing before S.B on 09.09.2021.

  
Chairman

09.09.2021

Appellant in person present.

Due to general strike of the legal ~~fraternity~~, the case is adjourned. To come up for preliminary hearing before the S.B on 27.10.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

27.10.2021

Counsel for the appellant present.

As per previous order sheet dated 02.06.2021 the appellant was directed to submit copies of appointment orders but he did not comply with. The appellant is directed to do the needful as directed in the said order. To come up on 04.01.2022 before S.B for preliminary hearing, if the appellant succeeds in doing the needful in compliance of order dated 02.06.2021.

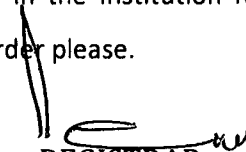


  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 16430 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/12/2020	<p>The appeal of Syed Nisar Ali Shah presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15/02/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
15.02.2021		<p>The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 02.06.2021.</p> <p style="text-align: right;"> Reader</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 16430/2020

**SYED NISAR ALI SHAH**

**VS**

**EDUCATION DEPTT:**

**INDEX**

<b>S.NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
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2	Appointment order	<b>A</b>	4.
3	LPC	<b>B</b>	5.
4	Service book	<b>C</b>	6- 22.
5	Request	<b>D</b>	23.
6	Requests	<b>E</b>	24- 25.
7	Correspondence	<b>F</b>	26- 28.
8	Letter	<b>G</b>	29.
9	Departmental appeal	<b>H</b>	30
10	Vakalat nama	.....	31.

**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**APPEAL NO. \_\_\_\_\_/2020**

Mr. Syed Nisar Ali Shah, SDM (BPS-16),  
GHS Nanak Pura, Peshawar City

.....**APPELLANT**

**VERSUS**

- 1- The Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer, District Peshawar.
- 5- Pay Fixation Party through Accounts Officer (CM&I), Accountant General, Khyber Pakhtunkhwa, Peshawar.

.....**RESPONDENTS**

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 FOR FIXATION OF PAY/PAY  
PROTECTION IN BPS-09 w.e.f. 01-11-1995 I.E. FROM THE  
DATE OF APPOINTMENT ON THE POST OF DRAWING MASTER  
AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL  
APPEAL OF THE APPELLANT WITHIN THE STATUTORY  
PERIOD OF NINETY DAYS.**

**PRAYER:**

That on acceptance of this appeal the respondents may kindly be directed to allow/grant pay fixation to the appellant in BPS-9 now BPS-15 w.e.f. 01-11-1995 with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as under:**

- 1- That the appellant was initially appointed as Process Server (BPS-04) in the District Judiciary of District Peshawar vide order 13-01-1985 and served the District Judiciary for about 10 years efficiently whole heartedly.
- 2- That the education Department advertised various post including the post Drawing Master (DM BPS-09) the appellant applied for the post of Drawing Master (DM BPS-09) through proper Channel and was accordingly selected after fulfilling all the codal formalities required for the post vide order dated 29-10-1995 and the appellant took over the charge of his post on 01-11-1995. Copy of

Appointment order dated 29-10-1995 is attached as annexure  
..... **A.**

- 3- That at the time of relieving from District Judiciary the Service Book prepared at the time of initial appointment in 1985 was also transferred to Education Department and accordingly necessary entry was made in the service wherein the initial pay for the post of Drawing Master was placed as Rs. 1605/- whereas the appellant was drawing basic pay of Rs. 1700/- from the post of Process Server in Judiciary. Copy of Service Book & LPC is attached as annexure ..... **B & C.**
- 4- That the appellant was promoted to the post of Senior Drawing Master (BPS-16) hence the appellant requested for issuance of pay slip in light of notification of Finance Department dated 1997. Copy of the request is attached as annexure ..... **D.**
- 5- That the appellant filed several requests for correction and fixation of his pay and finally the appellant filed a request before the Respondent no. 5 for fixation of the pay upon which proper correspondence have been made within the office of respondent no. 5 and finally reply was issued to the appellant for submission of his case in light of the Finance Department letter dated 30-03-2009. Copy of Requests, Correspondence & Letter dated 30.03.2009 is attached as annexure ..... **E, F & G.**
- 6- That, the appellant feeling highly aggrieved from the inaction of the respondents filed Department Appeal before the competent authority to tackle the case of the appellant for fixation of pay but not response has so far been received till date. Copy of Departmental Appeal is attached as annexure ..... **H.**
- 7- That feeling aggrieve and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

**GROUND:**

- A- That the inaction of respondents by not allowing pay fixation to the appellant w.e.f. 01-11-1995 i.e. the appointment as Drawing Master is against the law, facts, norms of natural justice and materials on the record hence not tenable in the eye of Law.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. 01-11-1995 i.e. the

appointment as Drawing Master and as such the inaction of the respondents is violative of law and rules.

D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.

E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation w.e.f. the date of initial appointment.

F- That it is well settled Principle of the Apex Supreme Court of Pakistan that once a benefit is allowed to a Civil Servant that cannot be withdrawn and act of the respondent by reducing and fixing the pay squarely falls with the disparity.

G- That in light of Rule 2.3 of the West Pakistan, Pension Rules, 1963 the appellant is fully entitle for the grant of pay fixation from the date of initial appointment.

H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

APPELLANT




**SYED NISAR ALI SHAH**

Through:



**NOOR MOHAMMAD KHATTAK**

&



**MUHAMMAD MAAZ MADNI**

Advocates,  
High Court, Peshawar



BETTER COPY OF PAGE-4

OFFICE OF THE DIR: DIRECTOR OF EDU: (S) PESHAWAR DIVISION,  
PESHAWAR

APPOINTMENT.

Appointment of the following person (s) is hereby ordered against the post of DM on temporary & adhoc basis at Rs. 1605-97-3060) fixed plus usual allowances as admissible under the rules in BPS (Rs: 1605-97-3060) at the institution noted against each name:-

S#	Name & qualification & address	Posted at	Remarks
1.	Mr. Syed Nisar Ali Shah S/O Syed Allud Din Shah, Village Wadpagga Peshawar, working as process post Court of Senior Civil Judge, Peshawar.	GMS Hassan Ghari, Peshawar	Against newly created post w.e.f 01.09.1995

TERMS AND CONDITION:

1. His/Her appointment is purely temporary & liable to termination any time without assigning reasons or notice.
2. In case of resignation he/she will have to submit one month's prior notice to the Deptt: or forfeited one month's pay in lieu thereof to the Govt:

Endst: 65694-99/Dated 29.10.1995



C-6

1985

# SERVICE BOOK

~~XXXXXXXXXX~~ التاريخ

15-1-85 P# 00019000

ATTESTED

Done  
X

g

GS&PD NWFP.-2005 PB. 30 000-19-8 84--(33)

Price Rs. 7.50

(For use in Police Department only).

Parul SSC Examinator BISC  
 Peshawar, Serv. 1927 (Annual)  
 Service Roll No. 43523,  
 S. No. 569678. Held in  
 April, 1927's enrol on  
 31-2-1927.

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_

SENIOR JUDGE  
 received back 1926

Left thumb-impression

Qualification	Date	Qualifications	Date
English		First Arts	
Pashtu		B. L. or B. A.	
Urdu		Pledership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing			
Court duties			
Reserve duties			

ATTESTED

N. B.—Also to be drawn under the qualification possessed.

- Note:—The
1. Name
  2. Race
  3. Resi
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C

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

1. Name

سید نثار علی شاہ

2. Race

سید

3. Residence

سکس ڈویژن پو ڈویژن تحصیل لکھنؤ

4. Father's name and residence

سید علاء الدین شاہ

5. Date of birth by Christian era as nearly as can be ascertained

12-9-1965 ✓

(بارہ ستمبر ۱۹۶۵ء)

6. Exact height by measurement

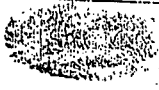
5-10

7. Personal marks for identification

تار کساؤ کلا تار

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

Little Finger



Ring Finger



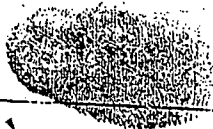
Middle Finger



Fore Finger



Thumb



9. Signature of Government servant

S. N

S. NISAR. Ali Shah

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

h

نیتھن (B) ۲۲  
(Amn)  
533,  
held in  
and on

JUDGE  
19128

Date





1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.K.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant	Signature and designation of the officer or other attesting in attestation columns 1 to 3
Nirmali Shah Pulver Servant Contd. of S.S. P. 2000		BPS-14 (920-26-1310)	1120/-			1-12-91		
do	Off		1206/-			1-12-91		
do	Off		1232/-			1-12-91		
<p>Pay fixed in the Revised Basic Pay Scales 1980 of Rs. 600-13-860 (B-1) with next increment on 1-12-1980</p> <p>W.F.P. Peshawar</p> <p>Accounts Officer</p>								
<p>Pay fixed in the revised Pay Scales 1981 of Rs. 920-26-1310 (B-1) with next increment on 1-12-1981</p> <p>P.M.W.E.F. 1-6-1981</p> <p>W.F.P. Peshawar</p> <p>Accounts Officer</p> <p>Pay Fixation Party</p>								
do		BPS-1 (1245-35-1700)	1665/-			1-6-94		
do			1700/-			1-12-94		

Bank of Peshawar





awa  
here  
pay  
to G

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 22 of C.S. II	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature Government servant
D.M. at G.M.S. Hesson Garhi (Peshawar)	Temp.	BPS No 9 (Rs 1605-97-3060)	Rs 1605/- P.M. Fixed.			1/11/95	<i>[Signature]</i>
Sh. Dns			1605/-			1/12/95	<i>[Signature]</i>
Gms Peshawar			Rs 1605/-			3/3/96	<i>[Signature]</i>
Sh.			Rs 1605/- p.m			1/12/96	<i>[Signature]</i>

Senior  
G.M.S. Peshawar



1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	9 Signature of the Governor in attestation of the servant columns
Gms. Haji Banda Peshawar			Rs. 1702/-	1657/2		27/97	<i>[Signature]</i>
do			Rs. 1799/-	1702/2		12/97	<i>[Signature]</i>
do			Rs. 1896/-	1799/2		12/98	<i>[Signature]</i>
do			Rs. 1993/-	1896/2		12/95	<i>[Signature]</i>
do			Rs. 1993/Pm			12/2000	<i>[Signature]</i>
do		B-9 2410-145-6767	2990/-	3135/-		12/2001	<i>[Signature]</i>
do			3138/-	3280/-		12/2002	<i>[Signature]</i>
All Casting Attested							
In m on DISTRICT OFFICER (M.M.F.) School & Literacy Peshawar <i>[Signature]</i>							

7	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		
6 97	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/97	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer	Period	Government to which debitable		(12) (13) Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
2 7	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/98	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				(11) Dispensed from Govt. Service at Sr. No. 40 vide DDECS) Peshawar Exdsts. No. 2806-2919 dated 13/2/97.
2 8	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/98	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				(12) Re-Instated in Service vide DDECS) Peshawar Exdsts. No. 5655-5855 dated 10/5/97.
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2001	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				(13) Terminated from Govt. Service at Sr. No. 14 vide DDECS) Peshawar Order Exdsts. No. 9943-10050 dated 26-6-1997.
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2002	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2003	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2004	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2005	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2006	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2007	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2008	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2009	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2010	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2011	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2012	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2013	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2014	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2015	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2016	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2017	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2018	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2019	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2020	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				
	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer in attestation columns 1 to 8	30/11/2021	1911	<i>J. K. Khan</i> Signature of the head of the office or other attesting officer				

District Education Officer (Male) Secondary, Peshawar

District Education Officer (Male) Secondary, Peshawar

District Education Officer (Male) Secondary, Peshawar

ATTACHED

13/12/19  
16/12/19





1 Name of post	2 Whether substan- tive or officiating, and whether permanent or temporary.	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension, under Art. 571 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature and name of the Government in attestation servicolums 1 to 8	9 Signature and name of the officer or Government in attestation servicolums 1 to 8
DM GMS Haji Banda Peshawar			3280/-	3425/-		12 2003		DISTRICT SCHOOL Peshawar
		Certificate Attested						
		District Officer (MALE) School & Literacy Peshawar.						
DM Haji Banda Peshawar			3425/- pm			31/7 2004		
DM GMS Palosi maghderzi Peshawar			3425/- pm			1/08 2004		Govt: F Palosi Mag
do-			3570/- pm			1/12 2004		Govt: Palosi Mag
do-			3570/- pm			30/6 2005		Govt: Palosi M
		BPS-9-2770-165-7720						
do-			4090/- pm			1/07 2005		
do-			4255/- pm			1/12 2005		Govt: Palosi M



14

7	9	10	11	12	13		14	15
					Leave	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Date of appointment	Signature and designation of the officer or other attesting officer in attestation columns 1 to 3	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Period	Government to which debitable	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
12/2003	<i>[Signature]</i> DISTRICT OFFICER (MALE) School & Library Peshawar		Transfer to CNS Palosi Magdharai Peshawar. Per: vide B. No. 1273-1312 Per: Khosh/No. 1273-1312 Date: 31-12-2004	<i>[Signature]</i>				Service verified w.o.f 1-1-2003 to 31-12-2003 from A.G. Roll and other record of this office
17/2003	<i>[Signature]</i> DISTRICT OFFICER (MALE) School & Library Peshawar			<i>[Signature]</i>				Service verified w.o.f 1-1-2004 to 31-7-2004 from A.G. Roll and other record of this office.
8/2004	<i>[Signature]</i> Govt. High School Palosi Magdharai Peshawar	30/11/2004	Scale Revised 1-7-2005	<i>[Signature]</i>				Service verified w.o.f 1-8-2004 to 31-12-2004 A.G. Roll and other record of this school.
11/2004	<i>[Signature]</i> Govt. High School Palosi Magdharai Peshawar	30/6/2005	Scale Revised 1-7-2005	<i>[Signature]</i>				Service verified w.o.f 1-1-2005 to 31-12-2005 from A.G. Roll and other record of this school.
11/2005	<i>[Signature]</i> Govt. High School Palosi Magdharai Peshawar	30/11/2005	Scale Revised 1-7-2005	<i>[Signature]</i>				Service verified w.o.f 1-1-2006 to 31-12-2006 from A.G. Roll and other record of this school.

OFFICE OF THE ACCOUNTANT GENERAL  
PESHAWAR  
PAY FIX. 2001  
OF RS. 3135/-  
AT RS. 3135/-  
1-12-2007  
1-12-2007

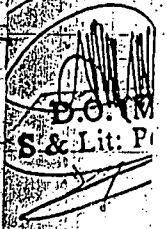
ATTESTED

*[Signature]*  
Head Master  
Govt. High School  
Palosi Magdharai Peshawar

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 nature and position of the office or in attestation forms 1 to 3
DM GHS, Pabosi Magdhojui Peshawar			B, 4420/-pm			11/12 2006	<i>[Signature]</i>	Head of Govt. P.W.D. Peshawar
to -			B, 4420/-pm			30/6 2007	<i>[Signature]</i>	In Charge Govt. High School, Mardan
to -			B, 5085/-			1/07 2007	<i>[Signature]</i>	In Charge Govt. High School, Mardan
to -			B, 5275/-pm			1/12 2007	<i>[Signature]</i>	In Charge Govt. High School, Mardan
DM GMS, Nohia Tadeed Peshawar Cantt.			B, 5275/-pm			29/12 2008	<i>[Signature]</i>	In Charge Govt. High School, Mardan
			B, 5275/-pm			1/08 2008	<i>[Signature]</i>	In Charge Govt. High School, Mardan

2005  
OFFICE OF THE ASSISTANT GENERAL  
N.W.F.F. PESHAWAR  
PAY FIXED IN THE PAY BAND  
OF RS. 2770-165-7720  
AT RS. 4097/- BY 2005  
With Next increment on 1.12.2005

Account Officer  
Pay fixation, N.W.F.F. Peshawar  
*[Signature]*



7- Date of Statement	8- Signature of Government servant	9- Nature and date of the office or of attesting in attestation clauses 1 to 8	10- Date of termination of appoint- ment	11- Reason of termination (such as promotion, transfer, dismissal, etc)	12- Signature of the head of the office or other attesting officer	13- Leave		14- Signature of the head of the office or other attesting officer	15- Reference to any recorded punishment or censure, or reward or praise of the Government Servant.	
						Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government	Government to which debtible			
12-06	[Signature]	Head Master Govt. High School Paloosi Maghdarzar Peshawar	2006	A. Anvi	[Signature] Head Master Govt. High School Paloosi Maghdarzar Peshawar				Service verified w.e.f 1-1-2007 to 31-12-2007 from Acg Roll and other record of this school.	
16-07	[Signature]	Head Master Govt. High School Paloosi Maghdarzar Peshawar		Scale Revised	[Signature] Head Master Govt. High School Paloosi Maghdarzar Peshawar				Service verified w.e.f 1-1-2008 to 29-2-2008 from Acg Roll and other record of this school.	
27-07	[Signature]	Head Master Govt. High School Paloosi Maghdarzar Peshawar		A. Anvi	[Signature] Head Master Govt. High School Paloosi Maghdarzar Peshawar					
2-08	[Signature]	Head Master Govt. High School Paloosi Maghdarzar Peshawar		Transfer to GMS Peshawar	[Signature] Head Master Govt. High School Paloosi Maghdarzar Peshawar					
3-08	[Signature]	Head Master Govt. High School Paloosi Maghdarzar Peshawar			[Signature] Head Master Govt. High School Paloosi Maghdarzar Peshawar					
		B.O. (M) S & Lit. Peshawar		E.S. Peshawar		TR. 22 71418		2 Drawn Rs. 83787- as pay for 08/2008.		
		OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR PAY FIXATION IN THE REVISED BASIC SCALES 2001 OF RS. 3185-190-8885 AT RS. 5025 P.M.W.E.F. 1-07-2007 With Next Increment on 1-12-2007		Accounts Officer Pay Fixation Party W.F.P. Peshawar		ATTESTED		ATDOAS PESH 9/1/08 5/17		

(B)

B.O. (M)  
S & Lit. Peshawar

E.S. Peshawar

TR. 22  
71418

2  
Drawn Rs. 83787- as pay  
for 08/2008.

OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P. PESHAWAR  
PAY FIXATION IN THE REVISED BASIC  
SCALES 2001  
OF RS. 3185-190-8885  
AT RS. 5025 P.M.W.E.F. 1-07-2007  
With Next Increment on 1-12-2007

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

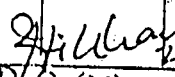
ATTESTED

ATDOAS PESH  
9/1/08  
5/17

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (a) substantive appointment or (b) whether service counts for pension under Act 37 of S. I.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature and designation of the officer attesting Government servant in columns 1 to 7
		BPS 3820-230-10720					
Don Gms Mee Nore Jadoh Peru			6350/-			7/12	<i>[Signature]</i> B&S
			6580/-			12/00	<i>[Signature]</i> B&S
			6810/-			12/09	<i>[Signature]</i> B&S
		Revised entry in MS under BPS No 9: 1605-97-3060					
			RS: 1605/-			11/95	
			RS: 1607/-			12/95	
			RS: 1702/-			12/96	
			RS: 1799/-			12/97	
			RS: 1896/-			12/98	
			RS: 1993/-			12/99	
			RS: 2090/-			12/2000	
			RS: 2187/-			12/2001	
		BPS 9 (2410-145-6760)					
			RS: 3280/-			12/2001	

*[Signature]*  
D.O (SI) 7

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Signature and attestation of the officer in attestation column 1
			RS: 3425/-			12/2002		
			RS: 3570/-			12/2003		
			RS: 3715/-			12/2004		
	BPS 9	(2770-165-7720)						
			RS: 4295/-			7/2005		
			RS: 4420/-			12/2005		
			RS: 4585/-			12/2006		
	BPS-9	(3185-190-5885)						
			RS: 5275/-			7/2007		
	BPS (9)	(3820-230-10720)						
			RS: 5465/-			12/2007		
			RS: 6580/-			7/2008		
			RS: 6810/-			12/2008		
			RS: 7040/-			12/2009		

  
 DLO (M)  
 FRS Peshawar



1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment; or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant in column 1 to	9 Signature of the officer in attestation column 1 to
Gms. <sup>PM</sup> Naurtha Jaded Pesh.		B-9	Rs 3870	-230	-10720	12/20/10	D.O. No. 12/20/10	
P. P. <sup>Pay scale</sup> 80015-1-7-11		B-PS-09-Rs	6200	-380	-17600			
		Rs	11900			12/11	Office D.O. No. 12/11/10	
D.M. GMS Surtaid Dheri Peshawa.		B-PS-09-Rs	Rs 12280			01/20/11	Office D.O. No. 01/20/11	

Office of the Accounts General  
Peshawar

Pay Fixed in the Regulation of 1907  
 Pay Fixed @ Rs. 11900/-  
 Adl.  
 Pay Fixed @ Rs. 11900/-  
 P.S. 6200-380-17600  
 Pay Fixed @ Rs. 11900/-  
 Date of Next Increment 16/07/2011

11900/11

Accounts Officer  
 Pay Fixation Party  
 Peshawar  
 12/04/17

TD-86  
 3/2/12  
 Drawn/ [Signature]  
 [Signature]  
 [Signature]







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

Name: Syed Nisar Ali Shah

Race: Syed

Residence: Wafda PO Wadpogga, Peshawar




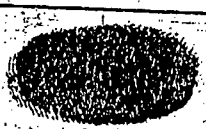
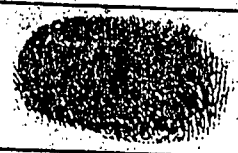
Father's name and residence: Syed Aloud din

Date of birth by Christian eras nearly as can be ascertained: 12-9-1965

Exact height by measurement: 5-10<sup>11</sup>

Personal marks for identification: A mole near nose

Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger		Ring Finger	
Middle Finger		Fore Finger	
Thumb			

Signature of Government Servant: [Signature]

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

ATTESTED

[Signature]

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state: (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant	Signature and of the head of or other attest in attest columns
		Revised entries on a/c of upgrade of scale from B-9 to B-15 w.e.f 1-7-20						
DM, GHS Sukaid Dhari, Dist Peshawar			BPS-15	8,500	700	2950	17 2012	[Signature]
		Rs 12700/-						
		<del>DM</del> <del>BPS-15</del>						
GHS Sukaid Dhari				8500	700	29500		
Peshawar				13400/PM		01/5/2012		
		Promoted to BPS 16 as Senior Drg Master B vide Director (E&S) Educator JKPR Peshawar No 3600-6 dt 20.2.2013 and DO E&S Peshawar No 9345 dt 15.3.2013 dt Sukaid						
		Principal of GHS Sukaid Dhari, Peshawar.						
		Govt. High School Academy Town, Peshawar						

PRINT  
D.H.S. 5  
Adeniy 7



1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "P"	Date of appointment	Signature of the head of the Government Serv	Signature and Designation of other attesting in attestation columns 1 to 4
SDM		BPS-16	16 (10000-300)	34000				
GHS Enfield Delhi	BPS-16		14000/-	✓		21/2 2013	[Signature]	Principal G.H.S Peshawar
DAI								Govt Agent
[Signature]			14000	✓		22/4 2013	[Signature]	Principal G.H.S Peshawar
GHS, Nanakpura Peshawar city			14000/-	✓	22/4 2013	22/4 2013	[Signature]	Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar
Principal G.H.S Peshawar								Principal G.H.S Peshawar

Revised Entry after  
Promotion  
pay in BPS 9 on 1-7-2012 12280  
Ph. no. 12280 + 300 + 1820 = 13400

BPS (S)-7-2012 12280 + 700 + 420 = 13400

1-7-2012 13400/-  
14-2-2012 13400/-

I do her  
payment  
fixation  
from m

Attes

AWA  
V-6

No.  
Date

21

8 Signature of Government Servant.	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		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure or praise of the Government Servant.	
					Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period:			Government to which debitable
<i>[Signature]</i>	Principal G.H.S. Sufaid Bazar Peshawar					Period: 15/4/13 Nature: Sick Allocation: Government to which debitable 12700/- 800/- Total 14000/-			
<i>[Signature]</i>	<del>Principal G.H.S. Sufaid Bazar Peshawar</del>					Period: 15/4/13 Nature: Sick Allocation: Government to which debitable 14000/-			
<i>[Signature]</i>	Principal G.H.S. Kanak Pura Peshawar					Period: 1/4 Nature: Sick Allocation: Government to which debitable 15400/- 800/- Total 16200/-			
						Period: 1-5-13 Nature: Sick Allocation: Government to which debitable 15600/-			
						Period: 1-12-2013 Nature: Sick Allocation: Government to which debitable 15600/-			
						Period: 21-2-2013 Nature: Sick Allocation: Government to which debitable 15400/- 800/- Total 16200/-			
						Period: 20-2-2013 Nature: Sick Allocation: Government to which debitable 16800/-			
						Period: 1-12-2013 Nature: Sick Allocation: Government to which debitable 15600/-			
						Period: 1-12-2013 Nature: Sick Allocation: Government to which debitable 15600/-			
						Period: 1-12-2013 Nature: Sick Allocation: Government to which debitable 15600/-			

**UNDER TAKING**  
 I do hereby undertake that if any over payment made to me due to incorrect fixation/ ~~the amount~~ may be recovered from my Pay/Pension Gradually

Attested: *[Signature]*  
 Signature

Awarded premature increment  
 W-e-f 01-06-2014 - vide Notification  
 No. FD (SO SR-1)2-123/2014  
 Dated 30-05-2014

Principal  
 G.H.S. Nanak Pura  
 Peshawar

ATTESTED

*[Signature]*  
 Declared Granted

1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state: (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "P"	Date of appointment	Signature of Government Servant	Signature and Date of the head of office in attestation columns 1
<i>Revised entries:-</i>								
				R/Pay B-09 (2410-145-6760)				
	Zol Apptl. in BPS-01			11/12/2001		3715		Rs 21,100
	Rs (440-10-840)			12/2002		3860		
	13/01/85	440		12/2003		4005		
	12/85	450		12/2004		4150		
	12/86	460		R/Pay B-09 (2770-165-7720)				
	R/Pay B-01 (600-13-860)			7/2005		4758		one in
	11/7/87	626		12/2005		4915		
	12/87	639		12/2006		5080		
	12/88	652		R/Pay B-09 (3185-190-8885)				
	12/89	665		7/2007		5845		19,100
	12/90	678		12/2007		6035		
	R/Pay B-01 (920-26-1310)			R/Pay B-09 (3820-230-10725)				
	1/6/91	1107		11/7/08		7270		2040
	2 Adv. Incr. due to SSC	+52		12/08		7500		2270
	12/91	1154		12/09		7730		2521
	12/92	1180		12/2010		7960		2730
	12/93	1206		R/Pay B-09 (6200-380-17600)				
	12/93	1232		11/7/2011		13040		2660
	R/Pay B-01 (1245-35-1770)			12/2011		13420		13040
	1/6/94	1665		upgraded to B-15				
	1/12/94	1700		(8500-700-29500)				
	option 1/12/95	1735		11/7/2012		14100		
	Appnt: as pm BPS-09			one premature inc: +700				
	Rs (1605-97-3060)			No. 1/12/2012		14800		3490
	2/12/95	1789		one premature inc: +700		14800		14100
	one premature inc:	97						
	12/96	1896						
	12/97	1993						
	12/98	2070						
	12/98	2187						
	12/99	2284						
	12/2000	2381						

Principal  
G.H.S. Narak Pura  
Peshawar City





4

Amir

D-23

To,

The Accountant General,  
Khyber-Pukhtoon Khwa Peshawar

Subject: - ISSUE OF PAY SLIP

Dear Sir,

It is brought to your kind notice that I have been promoted to BPS 16 on regular basis through DPC vide Director (E&S) Education Peshawar

No: 3600-6 Dtd: 21-2-2012 and adjustment order issue by Do (E&S) education vide No: S.O (B.S.A) 118 dated: 2012 at SNo. 47

It is requested that in the light of Notification issued by Finance Department vide No: FD (PRC) 5-9/85 dated 8-10-1997, the post of BPS 16 classified as Gazetted. Pay slip may kindly be issued.

Necessary document are attached here with

Date: 21/1/2014

Yours obediently, *[Signature]*

Name Syed Nisar Ali Shah

Designation S.D.M

Address GHS Nanak Pura Peshawar

*[Signature]*

PRINCIPAL  
G.H.S Nanak Pura  
Peshawar

ATTESTED

*[Signature]*

گنہگار خباب اینڈ سٹیوڈیو ڈسٹری بیوٹرز ایجنسیز پرائیویٹ لمیٹڈ (FIXATION of pay) 11/11/95 تا آخر ادا کیا گیا

(24)

درخواست براد (FIXATION of pay) 11/11/95 تا آخر ادا کیا گیا

جناب عالی - مسائل حسب ذیل عین رساں کیے گئے

- (1) یہ کہ مسائل مدرسہ 12/11/95 کو عدالت خباب سینئر سول جج کی پیشکش (process) کی گئی تھی۔
- (2) یہ کہ عرصہ تقریباً 1 سال تک مدرسہ 29/10/95 تک سینئر سول جج کی پاس ڈیوٹی انجام دیا۔
- (3) یہ کہ مدرسہ 29/10/95 بذریعہ آرڈر نمبر 99-65694 مدرسہ 29/10/95 کی رو سے (Through proper channel) عدالت سینئر سول جج سے حکم تعلیم ڈرائنگ ماسٹر Through proper channel اور مدرسہ 11/11/95 کو حکم تعلیم گورنمنٹ سول کورٹ کی درمیان ثالثات برقرار رہی ہیں۔
- (4) یہ کہ عدالت سینئر سول جج حکم کے پاس میرا (substantive part) مبلغ = 1700/- روپے ملائے ہیں۔
- (5) یہ کہ حکم تعلیم میں آنے کے بعد حکم تعلیم وروں نے مسائل کی تنخواہ ماہانہ 1605 روپے کے fixed کی تھی۔
- (6) یہ کہ اس طرح مسائل سے مبلغ = 95/- ماہانہ کیوں کی گئی جو مدرسہ 11/11/95 سے شروع ہوئی۔ اور مسائل کو اس طرح ہر ماہ مبلغ = 95/- روپے کی تھی۔

Handwritten signature



بخدمت جناب انچارج صاحب ایچ، اے، ڈی سیکشن دفتر اکاؤنٹس جنرل صوبہ خیبر پختونخواہ پشاور

جناب عالی!

گزارش حسب ذیل ہے کہ:

۱۔ سائل 13/01/1985 تا 31/10/1995 تک محکمہ جوڈیشری میں تقریباً عرصہ 10 سال بطور process server (بیانف)

خدمات انجام دیتا رہا۔

۲۔ 01/11/1995 کو سائل نے محکمہ تعلیم میں بطور ڈرائنگ ماسٹر ملازمت اختیار کر لی۔

۳۔ L.P.C. کے مطابق محکمہ جوڈیشری میں سائل کی بنیادی تنخواہ مبلغ 1700/- روپے تک پہنچ چکی تھی۔ لیکن محکمہ تعلیم میں سائل کی تنخواہ

مبلغ 1605/- روپے میں fix کر دی گئی۔ اور اس کی وجہ یہ بتائی گئی کہ سائل کو آن ٹرینڈ اساتذہ کے سبب سالانہ انکریمنٹ کا فائدہ نہیں دیا جاسکتا۔

۴۔ بعد ازاں سپریم کورٹ نے آن ٹرینڈ اساتذہ کے حق میں فیصلہ دیا۔ اور فنانس ڈیپارٹمنٹ نے اس فیصلے کی روشنی میں 30/03/2009

کو ایک نوٹیفیکیشن نمبر: PRC)5-2/2002 جاری کیا۔ جسکی کاپی درخواست کے ساتھ منسلک ہے۔

۵۔ اس نوٹیفیکیشن کے مطابق آن ٹرینڈ اساتذہ کو سالانہ انکریمنٹ کا فائدہ دیا گیا ہے۔ لیکن سائل کو تا حال یہ فائدہ نہیں ملا۔ جس کے سبب

میری تنخواہ اب بھی کم نکل رہی ہے۔

چونکہ سائل بھی دوسرے اساتذہ کی طرح سالانہ انکریمنٹ کے مذکورہ فائدے کا حقدار ہے۔ لہذا آپ سے درخواست کی جاتی ہے۔ کہ براہ کرم

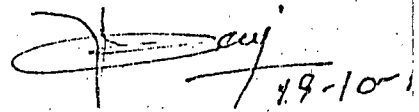
آپ Pay fixation پارٹی کو حکم نامہ جاری کر دیں۔ تاکہ میری تنخواہ پر نظر ثانی کر کے اسے Refix کیا جائے۔ اور مجھے میرا حق مل سکے۔

فقط آداب

مورخہ: 19/10/2016

العارض

تابع دارنار علی شاہ GHS/SDM نانک پورہ پشاور شہر



ATTESTED



No: PFP/C8 DIK/GC/2016-17/ 23

F-26

Dated: 02/02/2017

To,

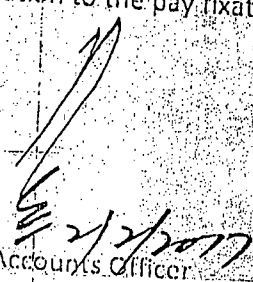
The Accounts Officer (C&M),  
Office of The Accountant General,  
Khyber Pakhtunkhwa, Peshawar.

Subject: Request for Correct Fixation of Pay in Respect of Nisar Ali Shah SDM.

Memo,

Kindly refer to your letter No.T-23(33)/AG/Gen: Complaints/Vol-IV/2016-17/296 dated: 27-10-2016 received by the Party on 30-01-2017) on the subject cited above.

The subject SDM may kindly be informed to provide his service book having entries of both services; duly attested by incumbent DDO/Head of the Office for pay verification to the pay fixation party in light of Finance Department letter dated 30-03-2009.

  
Accounts Officer  
Pay Fixation Party.

ATTESTED



No PFP/C-8-Bannu/G.C/2016-17

27  
Dated 24/03/2017

To:-

The Accounts Officer (C&M),  
Office of the AG, Khyber Pakhtunkhwa Peshawar.


Subject:-

**REQUEST FOR CORRECT FIXATION OF PAY IN R/O NISAR ALI SHAH SDM, GHS  
NANAK PURA PESHAWAR:**

Memo:

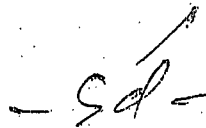
Kindly refer to your office Memo: No.T-23(33)/AG Gen Complaints/vol-VI/2016-17/561 dated 08.03.2017 on the subject noted above.


The Pay Fixation party has already communicated comments/reply in the subject case vide No. PFP/C-8 DIK/GC/2016-17/23 dated 02.02.2017. However copy of the same is against enclosed for necessary action please.

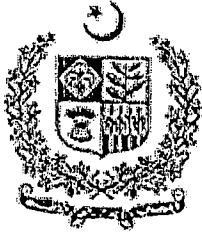
  
Accounts Officer,  
Pay Fixation Party,  
Camp at Bannu.

Copy of the above to:

1. Mr Nisar Ali Shah SDM, Govt: High School Nanak Pura Peshawar City, for similar action please.

  
Accounts Officer,  
Pay Fixation Party,  
Camp at Bannu

ATTESTED  




Office of the  
**Accountant General**  
Khyber Pakhtunkhwa Peshawar  
Phone: 091 9211250-54

28

No. T-23 (33)/AG/General Complaints/2016-17/614  
To


11<sup>th</sup> April, 2017


Mr. Nisar Ali Shah  
SDM, Government High school  
Nanak Pura, Peshawar City.

Subject: - REQUEST FOR CORRECT FIXATION OF PAY IN RESPECT OF  
MR. NISAR ALI SHAH SDM GHS NANAK PURA PESHAWAR

This is with reference to letter No. PFP/C-8 Bannu/G.C/2016-17 dated 24.3.2017, from Pay Fixation Party, addressed to this office with a copy thereof endorsed to you, on the above subject.

In light of the contents of the above-quoted letter, you are hereby advised to submit your Service Book to the Pay Fixation Party of this office after fulfilling all the required codal formalities, for necessary pay verification in light of the decision contained in Finance Department's letter dated 30.3.2009.

  
ACCOUNTS OFFICER (CM&I)

ATTESTED  


Attention Noorzada Suptol.

3



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

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

G-29

To:

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

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-1)

Endst: of even No & date.

ATTESTED

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-1)



حکومت جاہ - ایچ 4 ڈی سیکشن فٹننگ کانسٹریکشن کمپنی

درجہ اولیٰ Pay fixation از لیٹر نمبر 11/04/2017

(30)

حضرت عالی  
مردمانہ گزارش کہہ رہی ہے کہ مسائل حکم تعلیم میں  
بطور DM حراتہ 2995/11/11/05 سے کام کر رہا ہے۔ مسائل  
1985 میں ڈیپارٹمنٹ جوڈیشری میں کام کر رہا تھا وہاں ہسٹری  
کی بنیادی تنخواہ مبلغ 1700/- تھی اس میں حکم تعلیم میں  
تعمیر کی بنیادی تنخواہ 1805/- تھی جو کہ جیسٹس اور جج کے  
میں درجہ اولیٰ کی تھی جس کے بعد مسائل کے متعلقہ دستاویز  
میں جو کچھ درجہ اولیٰ تھی جس پر ان کے بعد مسائل کی طرف سے بھی  
حوالہ قبول نہیں ہوا۔

اس سلسلہ آپ کے پاس سے انکسپشن کی کہی ہے  
کہ مسائل کی تنخواہ کا تضاد قسم کی جائے مسائل غور  
مشکورہ نمونہ 1 ہے تاکہ  
21/09/2020

\_\_\_\_\_

مسائل ڈائریکٹر  
سیکرٹری عدالت عالیہ  
حکومت پاکستان  
کراچی

ATTESTED  
\_\_\_\_\_

**VAKALATNAMA**

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

\_\_\_\_\_ OF 2020

Syed Nisar Ali Shah

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

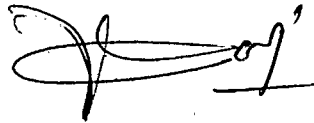
Education Department

(RESPONDENT)  
(DEFENDANT)

I/We Syed

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2020



CLIENT

  
**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**

  
**KAMRAN KHAN**

  
**MUHAMMAD MAAZ MADNI**

&

**AFRASIAB KHAN WAZIR**  
**ADVOCATES**

OFFICE:

Flat No.4, 2<sup>nd</sup> Floor, Juma Khan  
Plaza, near FATA Secretariat,  
Warsak Road, Peshawar.  
Mobile No.0345-9383141

Pay fixation A Cr. office

*[Handwritten signature]*

*Ujwal*

"B"

S.B

28/1/22 KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

76930

20

No.

Syed Nisar Ali Shah

Appeal No. .... of 20 ..

The Say ~~FESE~~ Deptt. KPN ..... Appellant/Petitioner  
Versus

5

Respondent

Pay Fixation Party through  
Accounts Officer (C.M & A) Accountant  
General KPN Peshawar.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

24th

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20 ..

*[Handwritten signature]*

2

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

16430  
Appeal/No. Syed Nisar Ali Shah of 20 20  
Appellant/Petitioner  
The Secy: FE & SE <sup>Versus</sup> Deptt: KPK Peshawar.  
Respondent

Respondent No. 1  
The Secretary FE & SE Deptt: KPK  
Peshawar.

Notice to: —

**WHEREAS** an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 1/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 24th

Given under my hand and the seal of Jan Court, at Peshawar this.....  
22  
Day of.....20 ..

**Registrar,**  
**Khyber Pakhtunkhwa Service Tribunal,**  
**Peshawar.**

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR. 8.B

No.

Appeal No. 16430 of 20 20

Syed Nisar Ali Shah Appellant/Petitioner

Versus

The Secy ERSE Deptt. KPN Respondent

Respondent No. 2

Notice to: —

The Secretary Finance Deptt. KPN  
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 1/13/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Doc - Admission Notice for Reply  
Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 24<sup>th</sup>

Day of Jan 20 22

Secy: Finance KPK  
Dairy No. Q/2  
Date 24/1/22

[Signature]  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

16430

20

Appeal No. Syed Nisar Ali Shah of 20

Appellant/Petitioner

The Secy: ERSTE Deptt: KPK

Respondent

The Director ERSTE Deptt: KPK

Notice to: —

Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 24th

Given under my hand and the seal of this Court, at Peshawar this.....  
Day of.....20

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**“B”**

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

No.

Appeal No. 16430 of 20 20  
Syed Nisar Ali Shah Appellant/Petitioner  
 Versus  
the Secy. ERSE Deptt. KPh Respondent  
 Respondent No. 4 31-1-22

Notice to: — the Distt Education Officer Distt.  
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 1/3/22 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Pre-Ad-issuance Notice for Reply

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....24<sup>th</sup>.....

Day of.....Jan.....20 22



Registrar,  
 Khyber Pakhtunkhwa Service Tribunal,  
 Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

“B”

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

No.

SB

Appeal No.....16730..... of 2020

Mr. Syed Nazir Ali Shah Appellant/Petitioner  
Versus

Secy, E & SE depart, KPk Peshawar Respondent  
Respondent No.....(1)

Notice to:

The Secy, E & SE depart, KPk Peshawar  
27/6

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....25/7/2022.....at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this off. re Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....17/7.....

Day of.....June.....2022

(For Reply)

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

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

No.

SB

Appeal No. 16430 of 20 20

Mr. Syed Nizar Ali Shah Appellant/Petitioner

Versus

Secy, E & SE depart, kPk Peshawar Respondent

Respondent No. (2)

Notice to: The Secy Finance depart, kPk Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 25/7/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 17th Day of June 20 22

(For Reply)  
Secy: Finance kPk  
Dairy No. ....  
Date 27-6

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazotted Holidays.
  2. Always quote Case No. While making any correspondence.

**“B”**

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

**No.**

Appeal No.....16430..... of 2020

...Mr. sled Nigar Ali Shah Appellant/Petitioner

Versus

...Secy. E & SE depart. kPk Peshawar Respondent

Respondent No.....(3).....

Notice to: The director, SE & E depart, kPk Peshawar

**WHEREAS** an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....25/7/2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

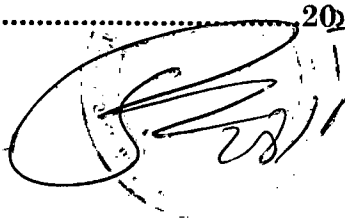
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....17th.....

Day of.....June.....2022

For Reply



**Registrar,**  
**Khyber Pakhtunkhwa Service Tribunal,**  
**Peshawar.**

Note: 1. The hours of attendance in the court are the same to that of the High Court except Sunday and Gazetted Holidays.  
 2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No..... 16430 ..... of 20 20 <sup>SB</sup>

..... Mr. Syed Nisar Ali Shah ..... Appellant/Petitioner  
Versus

..... Secy, E & SE depart, KPk Peshawar ..... Respondent

Respondent No..... (5)

Notice to:

Pay fixation Party through Accounts officer (CM&I), Accountant general, KPk Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... 28/7/2022 ..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ ✓  
Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 17th

Day of..... June ..... 20 22

For Reply

[Signature]  
ISSUE BRANCH  
CHIEF SECRETARY  
Govt. of Khyber Pakhtunkhwa  
Peshawar

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.