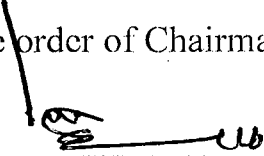


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1484/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2022	<p>The appeal of Mr. Muhammad Faisal resubmitted today by Mr. Matiur Rehman Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on <u>17-10-22</u> Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR .</p>

Respected Sir.

With regard to objection no:5 it is humbly submitted that departmental Appeal dated 12/09/2022, 20/07/2022 and 22/04/2022, 20/08/2022, 20/08/2022 are attached for your kind consideration.

With regard to objection no:6 the Rejection from the office of Respondant letter issued no:3 dated 22/08/2022 is attached for your kind

with regard to objection no:7 the notification FD(PRC) 1-1/85/11 Govt of NMPD bearing no Finance department dated 29/04/1985 is covering the said objection and which was presented before my level at the time of agreement.

Advocate


Advocate


Please Put the case Before the Bench

Respected Sir,

It is submitted that the present appeal has been filed by the learned counsel for the appellant which was returned to him with office objection 1-9 (Flag-A). Today i.e on 07.10.2022 he re-filed the same without removing the objections no. 5, 6 & 7.

Now the appeal is submitted to your honour under rule-7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

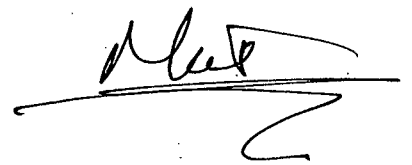
REGISTRAR

Worthy Chairman

2788/ST
10/10/2022

Learned counsel seeks
3 more days for
removal of objection. He
may do so possibly in all the
3 days.
10/10/22

Objection removed and
resubmitted.



12/10/2022

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: M. Faisal vs Govt of KPK

S#	CONTENTS	YES	NO
1	This Appeal has been presented by _____		
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?		
3	Whether appeal is within time?		
4	Whether the enactment under which the appeal is filed mentioned?		
5	Whether the enactment under which the appeal is filed is correct?		
6	Whether affidavit is appended?		
7	Whether affidavit is duly attested by competent oath commissioner?		
8	Whether Appeal / Annexures are properly paged?		
9	Whether Certificate regarding filing any earlier appeal on the subject, furnished?		
10	Whether annexures are legible?		
11	Whether annexures are attested?		
12	Whether copies of annexures are readable/ clear?		
13	Whether copy of appeal is delivered to AG/ DAG?		
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?		
15	Whether number of referred cases given are correct?		
16	Whether appeal contains cutting / overwriting?		
17	Whether list of books has been provided at the end of the appeal?		
18	Whether case relate to this Court?		
19	Whether requisite number of spare copies are attached?		
20	Whether complete spare copy is filed in separate file cover?		
21	Whether addresses of parties given are complete?		
22	Whether index filed?		
23	Whether index is correct?		
24	Whether security and process fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, Notice along with copy of Appeal and annexures has been sent to Respondents? On _____		
26	Whether copies of comments / reply / rejoinder submitted? On _____		
27	Whether copies of comments/ reply/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- _____

Signature: - _____

Dated: - _____

The appeal of Mr. Muhammad Faisal STT GHS kosht District Chitral Upper received today i.e. on 21.09.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Annexures-A to E referred to in the memo of appeal are not attached with the appeal which may be placed on it.
- 5- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 6- Copy of rejection order of departmental appeal in respect of appellant mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 7- Copy of pay revision rules/policy mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.
- 8- Chamber/Email address/contact number has not been mentioned on index/wakalat Nama.
- 9- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

Note: - The documents which will be placed on file should have been legible/visible.

No. 2670 /S.T,

Dt. 22/9 /2022


REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mati-ur-Rehman Adv.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1484 /2022

Muhammad Faisal

VERSUS

Govt. of KPK

INDEX

S.No	Descriptions of Documents	Annex	Page
1	Memo of Appeal with affidavit		1-5
2	Copy of pay slip	"A"	6
3	Copy of appointment order	"B"	7-8
4	Copy of the Finance Department's Notifications	"C"	9-10
5	Copy of pay slips of other employees	"D"	11
6	Copy of departmental representation	"E"	12-15
7	Wakalatnam		16

Muhammad Faisal

Appellant

Through

Mati Ur Rehman

Mati Ur Rehman

Advocate High Court

0344-9704900

0300-9800804

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1484 /2022

Case No. 1396

Dated 21-9-2022

Muhammad Faisal S/o Ajab Gul, Senior Theology Teacher BPS-16, at GHS Kosht Tehsil Mastuj, District Chitral Upper.

..... **Appellant**

VERSUS

- 1) Government of Khyber Pakhtunkhwa, Through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Government of Khyber Pakhtunkhwa, through Secretary Education, Civil Secretariat, Peshawar.
- 3) Government of Khyber Pakhtunkhwa, through Accountant General (AG) Peshawar.
- 4) District Education Officer (Male) District Chitral.
- 5) District Account officer (DAO), Chitral

..... **Respondents**

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 22.08.2022 WHEREBY; THE DEPARTMENTAL APPEAL OF THE APPELLANT REGARDING THE ANNUAL INCREMENT HAS BEEN REJECTED.

Respectfully Sheweth: -

- 1) **That** the appellant belongs to a respectable family of District Chitral Upper and holds a Degrees / Sanads of Shahadat ul Alia Fil Uloom ul Islamia Wal Arabia (Bachelor

of Arts) and also hold Shahadat ul Alamia Fil Uloom ul Islamia Wal Arabia from Wafaqul Madaras Arabia, Pakistan.

(Copy of pay slip is attached herewith marked "A")

- 2) **That** on the same qualification mentioned hereinabove, the appellant has appointed as Arabic Teacher by the respondents.

(Copy of appointment order is attached herewith marked "B")

- 3) **That** on 1983 the than government has introduced a policy called "Pay Revision Year" under the scheme of ibid policy the employees who have been appointed between 2nd June up to 30th November and who were in receipt of pay in revised national pay scales would receive their first increment in Basic Pay Scale on 01-12-1983. But those employees who have been appointed between 1st July, 1983 and 30th November, 1983 and would not be entitled to receive their first increment in basic pay scale on 01-12-1983. In short, those employees who have completed their six months' tenure after the initial appointment are entitled for the said increment and rest of employees are not entitled.
- 4) **That** needless to mention here that those employees who have opted for re-fixation on their pay on or after 01-07-1983 in terms of Finance Department's notification bearing No FD (PRC) 1-1/85-IV dated 01-02-1985 are also not entitled to draw the said increment. And that all promoted Civil Servants who have not completed the mandatory period of six months of service are also not entitled to get the increment.

(Copy of the Finance Department's Notifications are attached herewith marked "C")

- 5) **That** the ibid policy has again introduced by the than government of 2007, with the above mentioned conditions, that those employees and promoted Civil Servants who have not completed their six months of service on initial

appointment, and promoted Civil Servants after getting promotion have not completed six months of service are not entitled for the said benefits. Needless to mention here that some Civil Servants who were appointed initially and some of those got promotion, but not fulfilling the required conditions of six months of service also getting the said benefits.

(Copy of pay slips of other employees are attached herewith marked "D")

- 6) **That** admittedly the present appellant was appointed on 2007 and possessing less than six months of service when the said policy was announced by the respondents.
- 7) That some of co-appointee of the present appellant, despite their less than of six months of services are getting the said relief and the present appellant has been discriminated without cogent reasons.
- 8) **That** being aggrieved from the actions and inactions of the respondents the present appellant has preferred and appeal before the competent authority on 26-04.2022, which was referred to respondent No 3/ Accountant General office.

(Copy of departmental representation is attached herewith marked "E")

- 9) **That** the respondent no 5 after referring the said Notifications dismissed the plea of appellant on 22-08-2022, with the observation that the appellant has less than six months of service, therefore not entitled for the said increment.
- 10) **That** feeling aggrieved from actions and inactions of respondents, the appellant has no other remedy except to seeks indulgence of this Hon'ble Tribunal / Forum for redressal of his grievances, on the following amongst other grounds: -

GROUNDS

- A.** **That** the impugned order dated 22.08.2022 is against the law, facts, rules, regulations and without lawful authority thus liable to be set aside.
- B.** **That** disentitling the present appellant from the annual increment on first appointment pay revision year to those who have less than six months' service is against the Article 4 and 25 of the Constitution of Pakistan, 1973. Hence liable to be set aside.
- C.** **That** it is also worth perusal and required consideration that the service record of other employees is also supporting the stance of appellant, hence the impugned order dated 22.08.2022 and disentitling the appellant from the annual increment which is sheer violation of fundamental right, rules and regulation protected under the law and procedure.
- D.** **That** the respondents are badly failed to follow the law, rules and regulations and astonishingly the pay and salary policy of the Education department, but the impugned order is also violation of laid down polices, hence invites consideration of this Hon'ble Tribunal.
- E.** **That** the present appeal is well within time and this Hon'ble Tribunal may entertain this appeal under the law.
- F.** **That** the impugned order of the respondents without adopting proper criteria and codal requirements by the respondents is against the worthy ruling of the Hon'ble Superior Courts of Pakistan and therefore, the same is illegal practice and such practice adversely affects efficiency of incumbents and also reduces their confidence and faith in public, hence the impugned order and differing the appellant from his promotion are liable to be un-held on this score also.
- G.** **That** any other ground which has not been specifically mentioned will be agitated at the time of arguments with kind permission of this Hon'ble Tribunal.

5

It is therefore, humbly prayed that, on acceptance of the instant appeal the Hon'ble Tribunal may very graciously be declared the impugned order dated: 22.08.2022 and disentitling the appellant from annual increment on first appointment by the respondents as illegal, unlawful, without lawful authority and void ab-initio and to be set-aside.

Any other relief may also kindly be granted in the circumstances of the appellant's case.


Appellant

Through


Mati Ur Rehman
Advocate High Court


0344-9704900

0300-9800804

AFFIDAVIT

I, Muhammad Faisal S/o Ajab Gul, Senior Theology Teacher BPS-16, at GHS Kosht Tehsil Mastuj, District Chitral Upper (Appellant), do hereby affirm and declare on oath that the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.


Deponent


WITNESSED
WALID BANGASH
Oath Commissioner
Judicial Complex
Peshawar

6

Annex A
ATTESTED

Dist. Govt. KP-Provincial
District Accounts Office Chitral Upper
Monthly Salary Statement (August-2022)

Personal Information of Mr MOHAMMAD FAISAL d/w/s of AJAB GUL

Personnel Number: 00358466 CNIC: 4220149917639 NTN:
Date of Birth: 14.02.1978 Entry into Govt. Service: 07.06.2007 Length of Service: 15 Years 02 Months 026 Days

Employment Category: Active Temporary

Designation: SENIOR THEOLOGY TEACHER 80997881-DISTRICT GOVERNMENT KHYBE

DDO Code: CU6074-Head Master GHS Kosht

Payroll Section: 001 GPF Section: 001 Cash Center: 38

GPF A/C No: GPF Interest Free **GPF Balance:** 74,824.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	57,450.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1300	Medical Allowance	1,500.00
1918	UAA-CHITRAL 40%(16 G/NG)	3,000.00	2148	15% Adhoc Relief All-2013	700.00
2199	Adhoc Relief Allow @10%	504.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	5,801.00	2347	Adhoc Rel AI 15% 22(PS17)	5,801.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-941.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	441,000.00	-12,600.00	327,600.00

Deductions - Income Tax

Payable: 11,288.68 Recovered till AUG-2022: 1,882.00 Exempted: 0.22- Recoverable: 9,406.90

Gross Pay (Rs.): 87,629.00 Deductions: (Rs.): -19,181.00 Net Pay: (Rs.): 68,448.00

Payee Name: MOHAMMAD FAISAL

Account Number: 302400089310201

Bank Details: BankIslami Pakistan Ltd., 353024 Booni Branch Booni Branch, Chitral

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: DISTRICT OFFICER S&L Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: m.faisal.stt113@gmail.com

ORDER

(7)

Dated: Chitral the 22nd June 2007

No. /DCO/E-5. As recommended by the Departmental Selection Committee in its meeting held on 4-6-2007, the following is hereby appointed as Theology Teacher (BPS-14) (2565-275-11815) plus usual usual allowances as admissible under the rule with effect from the date taking over charge, in the best interest of public service, subject to the terms and condition noted below:-

Annex
B?

S.No	Name	Father Name	Residence	Posting Station	Remarks
1	Ijaz Hussain	Meliboobur Rehman	Zargarandeh Chitral	GMS Parsan	
2	Imaduddin	Ghulam Muhyuddin	Danin Chitral	GHS Susum	
3	Muhammad Wali Shah	Yaicem Shah	Khairabad Drosh	GHS Madaklasht	
4	Muhammad Ilyas	Ghulam Jilani	Broze Chitral	GHS Arandu	
5	Shamsheruddin	Abdul-Shahced	Kushum Mulkhov	GMS Parwak	
6	Ghufranullah	Hazrat Ali Shah	Warjun Mulkhov	GMS Saht	
7	Muhammad Usman	Haider Wali Khan	Reshun Mastuj	GHS Brep	
8	Sardar Alam	Shcr Alam Khan	Surwakht Mulkhov	GMS Washich	
9	Mutiur rehman	Latifullah	Garam Chashma	GHS Arkari	
10	Noor Shahiddin	Noorul Abrar	Shogram Mulkhov	GHS Reshun	
11	Hizbullah	Kifayatullah	Bakarabad	GHS Shagram	
12	Muhammad Qasim	Muhibullah	Pakhtun Oveer	GMS Shongush Owar	
13	Muhammad Zafarullah	Azimullah	Muldeh Ayun	GHS Mastuj	
14	Fazal Wahab	Sawala	Nagar Drosh	GHS Gasht	
15	Rehmanullah	Abdullah	Jang Bazar Chitral	GHS Shoghore	
16	Islam Khan	Rustam	Werkup Tokkhov	GMS Khot Paycon	
17	Asadur Rehman	Abdul Khaleq	Istara Tokkhov	GHS Mastuj	
18	Sharifullah	Jamilullah	Danin Chitral	GMS Awi	
19	Akhtar Khan	Abdul Qayum	Kesu Chitral	GMS Parkusap	
20	Fazal Haq	Mohammad Wali Khan	Shishikuh Chitral	GMS Khuzh	
21	Sultan Hussain	Saced Gul	Kosht Mulkhov	GMS Kosht Bala	
22	Muhammad Usman	Rehmat Nubi	Zaini Mulkhov	GHS Rech	
23	Rashid Ahmad	Niatullah	Sweer Drosh	GHS Bang	
24	Mumtaz Ahmad	Wazir Dullah Khan	Nagar Drosh	GMS Jinjrate Kuh	
25	Muhammad Faisal	Ajab Gul	Drasun Mulkhov	GMS Lasht Yarkhun	
26	Muhammad Saoodul Haq	Abdul Haq	Shah Nigar Drosh	GMS Zhupu	

TERMS AND CONDITIONS

1. Their service will be considered as regular but without pension or gratuity in terms of Section 19 of the NWFP Civil Servants Act 1973 as amended by NWFP Civil Servants

(8)

~~NOTED~~

2. They will contribute towards CP Funds at the rate of 10% of the minimum of pay and 10% contribution will be made by the government in lieu of pension/gratuity.
3. their service being purely temporary is liable to termination at any time.
4. They should produce health and age certificate from the MS DHQ Hospital Chitral
5. They should take over charge within 15 days, otherwise their appointment order will stand automatically cancelled.
6. Their original Degrees/Certificates will also be verified from the concerned University/Boards. Any dis-information detected later on will result their termination from service and criminal will also be registered against them.
7. They will be governed by such rules and regulations issued by the government from time to time.
8. Efforts for transfer before the completion of normal tenure will result to their disqualification for further service
9. Charge report should be submitted to all concerned
10. They should not be handed over charge if their age exceeds 33 years on 25-2-2007 (i.e. last date for submission of application), unless they produce age relaxation from the competent authority.
11. In case of any deficiency in posts being filled up the appointment of candidate with lesser merit (in open merit) will stand automatically cancelled.
12. they will be on probation for a period of 2 years

(Kamran Rehman Khan)
District Coordination Officer
Chitral

No: 13111-166 IE-5


Copy forwarded to the :-

1. Director, S&L NWFP Peshawar
2. District Nazim Chitral
3. Executive District Officer, S&L Chitral
4. District Accounts Officer, Chitral
5. Principals/Head Masters concerned
6. Incharge SET, Middle Schools concerned
7. Teacher concerned


District Coordination Officer
Chitral

(9)

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Annex 100


Finance Department Civil Secretariat Peshawar <http://www.finance.gpgk> letter NO. FD(PRC) 1-1/85-1 Government of NWFP FINANCE

DEPARTMENT DATED PESHAWAR, the April, 29, 1985

letter NO. FD(PRC) 1-1/85-1 Government
of NWFP

FINANCE DEPARTMENT

DATED PESHAWAR, the April, 29, 1985

From

The secretary to Govt: of NWFP.
Finance Department, Peshawar

To:

1. All Administrative Secretaires to Govt of NWFP.
2. THE SENIOR MEMBER BOAD OF Revenue NWFP.
3. All Heads of Attached Departments OF NWFP.
4. All Commissioners/ Deputy Commissioners/ Political agents/ District and session Judges in NWFP.
5. THE Registrar High Court Peshawar.
6. The Chairman Public Service Commission NWFP.
7. The Secretary to Government of NWFP.
8. THE Chairman, Services Tribunal NWFP.
9. The Secretary, Board of Revenue, NWFP.

SUBJECT: SCHEME OF BASIC PAY SCALES PRII/GE BENEFITS OF PROVINCIAL CIVIL SERVANTS (1983) ADMISSIBILITY OF INCREMENT.


Sir,

I am directed to refer to paragraph 3(ii) of this Department's circular letter No.FD (SR-1)1-67/82 dates 24,08.1983 and to say that it has come to notice that there exists some confusion regarding the admissibility of annual increment to civil servants as a result of introduction of/basic pay scheme. The position is clarified as under:

1. Question whether employees who have been promoted to higher posts between 2nd June, and 30-6-1983 would be entitled to draw increment on 1-

12-1983. Under Sub-para (ii) of para 3 of Finance Department's circular letter No.FD(SR-1) 1-67/82 dated 24.8.1983. The condition of six months' service prior to 1-12-1983 has already been relaxed for the grant of 1st increment in B.P.S on 1-12-1983. Therefore, all employees including those promoted to higher posts between 2-6-1983 to 30-6-1983 are entitled to received their first increment on 1-12-1983.

2. Question ii: Whether employees promoted to higher posts between 1-7-1983 to 30-11-1983 would be entitled to draw increment on 1-12-1983. These employees will not be entitled to receive increment in their basic pay scale on 1-12-1983 since they have not completed six months' services. In such a cases para 7 of NWFP Civil Services Pay Revision Rules, 1988 will apply.
3. Question whether employees who have been appointed between 2nd June and 30th November, 1983 and would not complete six months' services under the existing rules would be entitled to draw increment on 1-12-1983. Employees appointed up to 30-6-1983 and who were in receipt of pay in revised National Pay scales would receive their first increment in BPS on 1-12-1983. But those employees who have been appointed between 1st July, 1983 and 30th November, 1983 would not be entitled to receive their 1st increment in basic pay scale on 1-12-1983. In such cases they would draw their first increment in BPS on 1-12-1984.
4. Question whether employees who have opted for re-fixation of their pay on or after 1-7-1983 in terms of Finance Department Circular Letter No. FD(PRC) 1-1/85-IV dated 1-2-1985 would be entitled to draw increment in 1-12-1983. These employees will not be entitled to receive increment in their Basic Pay Scale on 1-12-1983. Their cases will be regulated under Rules 7 of NWFP Civil Services Pay Revision Rules, 1978 read with sub- Rule (3) of Rule 10 of above mentioned Rules.

SECRET


Your obedient servant
(IFTIKHAR AHMAD)
Deputy Secretary Regulation

Tele: 73726

(PRC) 1-1/85-iv.

Dated Peshawar, the April, 29.1985.

Copy forwarded for information to:

1. All autonomous and semi-autonomous bodies of NWFP.
2. THE SECRETARY Finance department, govt of Punjab, Sindh and Baluchistan.

IFTIKHAR HUSSAIN

Officer On Special Duty

11

Annex "D"
ATTACHED

Dist. Govt. NWFP-Provincial
District Accounts Office Chitral
Monthly Salary Statement (July-2022)



Personal Information of Mr RAHMANU ULLAH d/w/s of ABDULLAH
Personnel Number: 00358849 CNIC: 1520105535919
Date of Birth: 01.11.1973 Entry into Govt. Service: 07.06.2007

NTN:
Length of Service: 15 Years 01 Months 026 Days

Employment Category: Active Temporary
Designation: SENIOR THEOLOGY TEACHER 80001314-DISTRICT GOVERNMENT KHYBE
DDO Code: CL6116-HM GHS KARI CHITRAL
Payroll Section: 001 GPF Section: 001 Cash Center: 54
GPF AC No: 358849 Interest Applied: Yes GPF Balance: 584,323.00
Vendor Number: 30221000 - RAHMANULLAH EDUCATION DEPARTMENT CHITRAL
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 16 Pay Stage: 14

Wage type		Amount	Wage type		Amount
0001	Basic Pay	59,710.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1918	UAA-CHITRAL 40%(16 G/NG)	3,000.00
1947	Medical Allow 15% (16-22)	1,500.00	2148	15% Adhoc Relief All-2013	780.00
2199	Adhoc Relief Allow @10%	530.00	2316	Teaching Allowance 2021	3,782.00
2341	Dispr. Red All 15% 2022KP	6,029.00	2347	Adhoc Rel Al 15% 22(PS 17)	6,029.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-759.00	3990	Emp. Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 12,135.28 Recovered till July-2022: 759.00 Exempted: 3033.33 Recoverable: 8,342.95

Gross Pay (Rs.): 90,451.00 Deductions: (Rs.): -6,399.00 Net Pay: (Rs.): 84,052.00

Payee Name: RAHMANU ULLAH
Account Number: 9877-0104224135
Bank Details: MEEZAN BANK LIMITED, 429877 ATALEEQ BAZZAR CHITRAL ATALEEQ BAZZAR CHITRAL, CHITRAL

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: City: HEAD MASTER GHS Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: City: Email:

(12)

Annex COE 2

Office of the
Commissioner General
Khyber Pakhtunkhwa Peshawar
Phone: 091 9211250-53

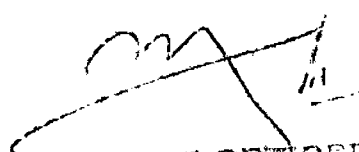
Ref: P/2022/117

Dated: 21.04.2022

THE DISTRICT ACCOUNTS OFFICER,
UPPER TRIBUNAL.

Subject: Inadmissibility of Annual Increment on First Appointment Pay Revision year to those who have less than six months service.

The undersigned is directed to refer to your office letter No. P/2022/117 dated 26.04.2022 on the subject noted above and to say that the said provision of rules is made for promotion in the year of pay revision not for initial appointment of Government servants. Hence the said teachers are not entitled for annual increment as per order of 01.12.2007.


ACCOUNTS OFFICER (HAD)

مخدومت جناب می مشترک انجمن افسر ایئر جتھرال

مضمون درخواست برائے وصولی انگریز خدمت

جناب عالی

سائلان ڈسٹرکٹ انجمن افسر ایئر جتھرال کے زیر نگرانی
اپنی خدمات سر انجام دے رہے ہیں اور سائلان کی تصیناتی
2007 میں ہوئی تھی۔ اور اس وقت سے اب تک سائلان
انتہائی فوش اسلوبی سے اپنی ڈیوٹی سر انجام دے رہے
ہیں۔ سائلان کے ساتھ جو دوسرے اساتذہ بھرتی ہوئے تھے
ان کو پے ریویژن کا فائدہ دے کر ان کو ایک انگریز خدمت
افتخانی مل رہا ہے۔ جو کہ سائلان کو اب تک نہیں مل رہے۔
اور یہ بھی فائدہ 1985 سے ہو رہے کے دیگر ملازمین کو بھی
ملا آ رہا ہے۔ دستاویزات درخواست کے ساتھ لف میں

لینڈا استعمانی جاتی ہے کہ جو میراثات دیگر
اساتذہ کو مل رہا ہے وہی میراثات سائلان کو
بھی دیا جائے۔

الحق قوم
عین توازش ہوگی۔

- سائلان
- (1) شمشیر الدین - آئی سی ٹی
 - (2) محمد عثمان - آئی سی ٹی
 - (3) سردار عالم - آئی سی ٹی
 - (4) سلطان حسین - آئی سی ٹی

- میراثات
- (5) مصراخ الرحمن - آئی سی ٹی
 - (6) صادق الرحمن - آئی سی ٹی
 - (7) اسرار الرحمن - آئی سی ٹی
 - (8) محمد فہیم - آئی سی ٹی

To

The worthy District Education Officer (EDO)
Male Upper Chitral.

Subject. Application for Reminder.

with due respect, it is humbly submitted
that the undersigned have presented an departmental
Appeal on 22-04-2022 before your good
office but so far no order has been passed
against that Appeal.

Therefore it is requested that worthy
EDO (Male) may kindly intimate us regarding
the decision on said Appeal.

Applicants.

- (1) Shamsker uddin (SST) Shamsker
- (2) Muhammad Usman (STT) Usman
- (3) Sardar Alam (STT) Alam
- (4) Sultan Hussain (STT) Sultan
- (5) Miraj uddin (STT) Miraj
- (6) Sadiq ur rehman (STT) Sadiq
- (7) Aseel ur rehman (STT) Aseel
- (8) Muhammiad Faisal (STT) Faisal

Date: 20/7/2022

To

THE WORTHY DISTRICT ACCOUNT OFFICER ENITRAL UPPER

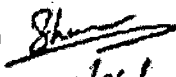

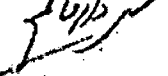

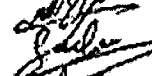
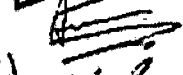
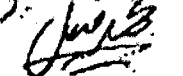

Subject: Application for considering the letter of (DEO) upper court

R/Sir,

with respect that the under signed have prepared an appeal before the (DEO) name of upper court on dated (22/04/2022) following to a summons letter (22/07/2022). The concern office of EDO upper court has referred the said appeal to your good office for your opinion.

Therefore, it is requested that on acceptance of this said application please provide us decision / opinion on said appeal.

Applicants

- ① Shaukat Uddin (SST)  DT 12/04/2022
- ② Muhammad Usman (SST) 
- ③ Sardar Alam (SST) 
- ④ Sultan Hussain (SST) 
- ⑤ Miraj Uddin (SST) 
- ⑥ Saad ul Rehman (SST) 
- ⑦ Asad ul Rehman (SST) 
- ⑧ Muhammad Faisal (SST) 



مورخہ

مقدمہ

دعویٰ

جرم

22ء 2022 مخانب مدلی

محمد فیصل

بنام گورنمنٹ آف سندھ حکومت

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکیل کاروائی متعلقہ

آن مقام پیشاور

کیلیے قتی الرضی، رفعت بتول، محمد نسر اللہ اور خلیفہ اللہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھو یا کہ سندر ہے۔

2022ء

ماہ اکتوبر

چھ

المرقوم

العبد د گ واہ العبد

محمد فیصل

Attested and accepted
ذیشان آفندپیشاور
ذفت بتول
RAAذفت بتول
مقام