

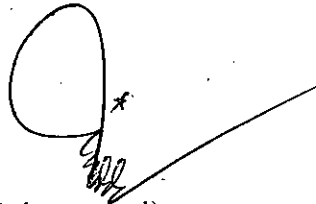
18.10.2022

Nemo for the appellant. Mr. Wahab Ali, Section Officer and Mr. Masood Khan, ADEO alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

18.10.2022



(Mian Muhammad)
Member (Executive)



(Salah-Ud-Din)
Member (Judicial)

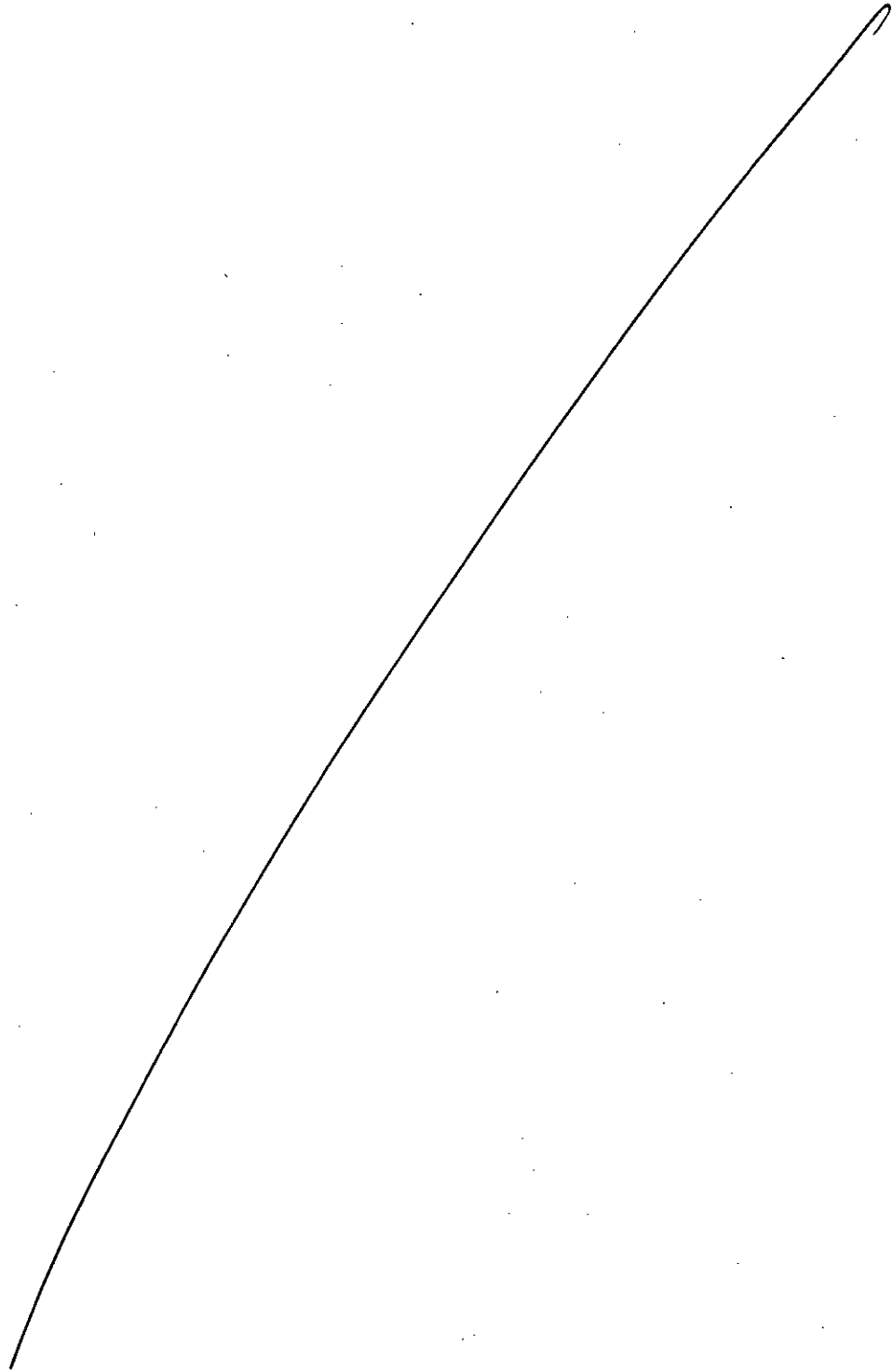
02.09.2022

Appellant alongwith his counsel present. Mr. Masood Khan, ADEO (Litigation) alongwith Mr. Muhammad Adeel Butt; Additional Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up arguments on 18.10.2022 before the D.B.



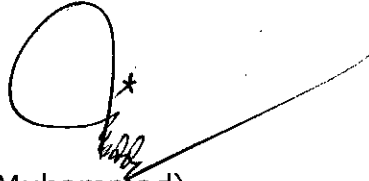
(Salah-Ud-Din)
Member (Judicial)



13.04.2022

Nemo for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG alongwith Mr. Masood, ADEO for respondents present.

Previous date was changed on Reader note, therefore, notice of prosecution of appeal be issued to the appellant as well as his counsel through registered post. To come up for arguments before the D.B on 21.06.2022.



(Mian Muhammad)
Member(E)



(Salah Ud Din)
Member(J)

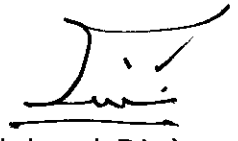
21.06.2022

Nemo for the appellant. Mr. Masood Khan, ADEO (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

On previous date too, none was present on behalf of the appellant, therefore, office was directed to issue notice to appellant as well as his counsel through registered post, however the same has not been done, therefore, explanation in this respect be called from concerned official. Fresh notice be issued to appellant as well as his counsel through registered post and to come up for arguments on 02.09.2022 before the D.B.



(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

Counsel are once again informed telephonically for the date fixed 02/09/2022, respectfully to it is stated that due to lack of postal tickets the only option is to inform through mobile.

13.01.2021

Junior to the senior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Masood, ADEO on behalf of respondents No. 1 to 6, are also present.

Written replies on behalf of respondents No. 1 to 6 have already been submitted. Neither written reply on behalf of respondent No. 7 is submitted nor any representative on his behalf is present, therefore, he is proceeded against ex-parte. File to come up for rejoinder and arguments on 23.04.2021 before D.B.

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

23.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 16.08.2021 for the same as before.


Reader

16.08.2021

Since 16.08.2021 has been declared as Public holiday on account of Moharram, therefore, case is adjourned to 30.12.2021 for the same as before.


Reader

30.12.2021

Due to winter vacation, the case is adjourned. To come up on 13/4/2022.


Reader

01.10.2020

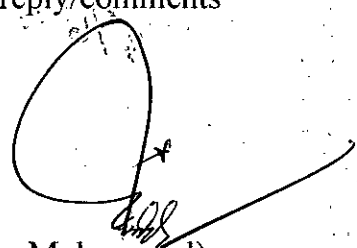
Counsel for the appellant present.

Mr. Kabirullah, Khattak, Additional Advocate General

for respondents present.

Written reply on behalf of the respondents No. 3,5 and 7 not submitted. Learned AAG sought time to contact the respondents No. 3,5 and 7 for submission of written reply/comments. Time is allowed.

Adjourned to 24.11.2020 for written reply/comments of respondent No.3,5 and 7 before S.B.

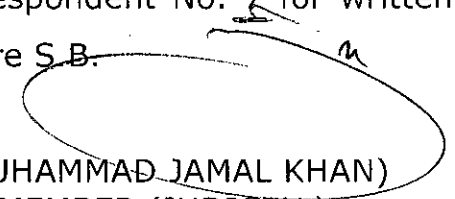


(Mian Muhammad)
Member (E)

24.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Shoab Akhtar, Litigation Officer, on behalf of respondent No. 3 and Mr. Zakiullah, Senior Auditor, on behalf of respondent No. 5, are also present.

Representatives of respondents No. 3 & 5 submitted joint written reply on behalf of the said respondents which is placed on record. While written reply on behalf of respondents No. 1, 2, 4 & 6 has already been submitted. None present on behalf of respondent No. 7 nor written reply on his behalf is submitted so far, therefore, notice be issued to respondent No. 7 for written reply/comments for 13.01.2021 before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

25.06.2020

Counsel for the appellant present. Addl: AG for respondents present. Learned counsel for the appellant submitted application for extension to deposit the security and process fee. Application is allowed. Appellant is directed to deposit security and process fee within three days, thereafter notices be issued to the respondents for submission of written reply/comments. To come up for further proceedings on 12.08.2020 before S.B.

Appellant Deposited
Security Process Fee
30/6/20


MEMBER

12.08.2020

Counsel for the appellant and Addl. AG alongwith Shoaib Akhtar, Litigation Officer for respondents No. 1, 2, 4 and 6 present.

Written comments/reply on behalf of respondents No. 1, 2, 4 and 6 has been furnished. Fresh notices be issued to respondents No. 3, 5 and 7 for submission of written reply/comments on 01.10.2020 before S.B.


Chairman

12.02.2020

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Retired Chowkidar) has filed the present service appeal for issuance of direction to the respondents to release Group Insurance, Benevolent Fund and Education Foundation Fund to the appellant from the date of his retirement. Submission made by learned counsel for the appellant need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 02.04.2020 before S.B.


Member

02.04.2020

Due to public holiday on account of COVID-19, the case is adjourned for the same on 25.06.2020 before S.B.




Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 285/2020 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/01/2020	<p>The appeal of Mr. Raj Wali presented today by Mr. Muhammad Asif Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	15/01/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/02/2020</u></p> <p> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

S.A.No. 285 /2020

Raj Mali *Appellant*

VERSUS

District Education Officer (Male) District Education Office,
Nowshera. & others *Respondents*

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Memo of appeal.		1-4
2	Affidavit.		5
3	Addresses of the parties.		6
4	Copy of appointment letter	A	7
5	Copy of retirement order dated 01.07.2016	B	8
5	Copy of appeal	C	9
8.	Wakalatnama		



Appellant

Through

M.A. Asif

Muhammad Asif

Advocate Supreme Court

Off: 214 Syed Ahmad Ali Building
Near Taj Autos, Sunehri Masjid
Road, Peshawar Cantt.
Office No.091-5279292
Cell: 0302-8885187
0311-1934339

Dated: 10-1-2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

1

S.A.No. 285 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 299

Date 10-01-2020

Raj Mali son of Sher Muhammad
R/o Mohallah Navey Kaley, Nowshera Kalan,
Tehsil and District Nowshera..... *Appellant*

VERSUS

- ✓ 1) District Education Officer (Male) District Education Office, Nowshera.
- ✓ 2) Sub Divisional Education Officer (Male), District Education Office, Nowshera.
- 3) Senior District Accounts Officer, District Accounts Office District Nowshera.
- ✓ 4) Director of Education, Directorate of Education Office, G.T. Road Peshawar City.
- 5) Accountant General, Accountant General Office, Fort Road, Peshawar Cantt.
- ✓ 6) Government of Khyber Pakhtunkhwa, through Secretary Education Department, Civil Secretariat, Peshawar.
- 7) Government of Khyber Pakhtunkhwa, through Secretary Finance Department, Civil Secretariat, Peshawar..... *Respondents*

Filed to-day


Registrar
10/1/2020

APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 .WHEREBY
APPELLANT HAS NOT BEEN GRANTED (i)
GROUP INSURANCE (ii) BENEVOLENT
FUND AND EDUCATION FOUNDATION
FUND ETC. ON RETIREMENT WHILE
APPEAL FILED ON 25.09.2019 HAS
NEITHER BEEN DECIDED NOR HAS BEEN
REPLIED WHILE 3 MONTHS HAVE BEEN
PASSED.

Prayer:

On acceptance of this appeal, the respondents may kindly be directed to release Group Insurance, Benevolent Fund Education Foundation Fund amount etc. to the appellant from the date of retirement i.e. by setting aside the oral refusal.

Respectfully Sheweth;

Appellant humbly submits as under:

- 1) That appellant was appointed as Chowkidar on 01.07.1991 and was posted in Govt. Primary School, Zaidi Colony Nowshera Kalan in BPS-I. (Copy of appointment letter is Annexure "A").
- 2) That during services appellant was granted BPS-2 and finally appellant was granted BPS-4 and on date of retirement i.e. 01.07.2016 the appellant was serving in BPS-4 and on retirement only encashment of LPR 365 days on full pay was granted. (Copy of the order is Annexure "B").
- 3) That later on pension and gratuity benefits were released to the appellant and now appellant is receiving monthly pension regularly.
- 4) That although to the appellant pension has been released but amount of group insurance, benevolent fund and education foundation fund has not been released.
- 5) That appellant requested to the respondents for the release of the same but turned deaf ears and finally on 25.09.2019 appellant filed an appeal to the respondent No.1. (Copy of the appeal is Annexure "C").
- 6) That statutory period of 3 months have been passed but neither the appeal has been decided nor the above mentioned amount has been released to the appellant.

7) That aggrieved with appellant has come before this Hon'ble Tribunal on the following grounds amongst the others:

GROUNDS:

- a. That the oral refusal of respondents of not releasing the amount of Group Insurance, Benevolent Fund and Education Foundation fund is against law and facts. Hence is untenable in the eyes of law.
- b. That by not releasing the above mentioned amount respondents are exercising the powers not vested to them under the law.
- c. That the respondents failed to appreciate the real point involved in the case in its perspective. Hence have arrived at an incorrect conclusion.
- d. That appellant was appointed on 01.07.1991 and retired on 01.07.2016 and thus has served for more than 25 years.
- e. That the respondents failed to appreciate the fact that the Hon'ble Peshawar High Court Peshawar has held that all government employees whom retired on superannuation are entitled for receiving the amount of Group Insurance and thus appellant is also entitled for the said amount.
- f. That to all the Govt. class-IV employees amount of Benevolent Fund is released at their retirement but in the case of appellant has refused to release the same.
- g. That on retirement to every class-IV employee an amount of Rs.30000/- is released from Education Foundation Fund but strange enough that appellant is not treated at par with these employees to whom the amount was released.
- h. That by not releasing the above mentioned amount to the appellant, respondents are violating the fundamental rights of appellant.
- i. That by not releasing the above mentioned amount to the appellant, respondents are neither following the service laws nor rules and as such are acting illegally.

j. That the oral decision of respondents for not releasing the above mentioned amount to the appellant is perversant and against the settled principle of law and justice and as such is liable to be set aside.

It is, therefore, requested that on acceptance of this appeal, the respondents may kindly be directed to release the above mentioned amount of Group Insurance, Benevolent Fund and Education Fund to the appellant along with any other remedy which this Hon'ble Tribunal deems fit and appropriate and appellant is entitled may kindly also be issued to the appellant.



Appellant

Through *Moh* *ASIF*

Muhammad Asif

Advocate,

Supreme Court of Pakistan

Off: 214 Syed Ahmad Ali Building
near Taj Autos, Sunehri Masjid
Road, Peshawar Cantt.

Cell: 0302-8885187

Off: 091-5279292

CERTIFICATE:

Certified as per information furnished by my client that no such like appeal has earlier been filed before this Hon'ble Tribunal.

Moh *ASIF*

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR

S.A.No. _____ /2020

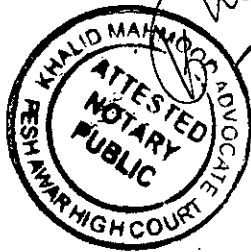
Raj Mali *Appellant*

VERSUS

District Education Officer (Male) District Education Office,
Nowshera. & others *Respondents*

AFFIDAVIT

I, Raj Mali son of Sher Muhammad R/o Mohallah Navey Kaley, Nowshera Kalan, Tehsil and District Nowshera do hereby affirm and declare on oath that the contents of the 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

(6)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

S.A.No. _____ /2020

Raj Mali *Appellant*

VERSUS

District Education Officer (Male) District Education Office,
Nowshera. & others *Respondents*

ADDRESSES OF THE PARTIES

APPELLANT:

Raj Mali son of Sher Muhammad
R/o Mohallah Navey Kaley, Nowshera Kalan,
Tehsil and District Nowshera

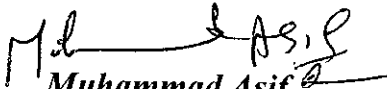
RESPONDENTS:

- 1) District Education Officer (Male) District Education Office,
Nowshera.
- 2) Sub Divisional Education Officer (Male), District Education Office,
Nowshera.
- 3) Senior District Accounts Officer, District Accounts Office District
Nowshera.
- 4) Director of Education, Directorate of Education Office, G.T. Road
Peshawar City.
- 5) Accountant General, Accountant General Office, Fort Road,
Peshawar Cantt.
- 6) Government of Khyber Pakhtunkhwa, through Secretary Education
Department, Civil Secretariat, Peshawar.
- 7) Government of Khyber Pakhtunkhwa, through Secretary Finance
Department, Civil Secretariat, Peshawar



Appellant

Through


Muhammad Asif
Advocate Supreme Court

OFFICE ORDER:

Annex A

MR: Raj Mali S/O Sher Mohammad is hereby appointed as Chowkidar in GPS Zadi Colony Nowshera Kallan against the newly Created post BPS NO:1 with effect the date of taking over Charge .

Notes:

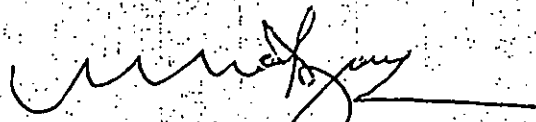
Charge repst should be submitted to all Concerned. No T/A D/A is allowed.

SUB DIVISIONAL EDUCATION OFFICER
(MALE) NOWSHERA.

Endst: NO: 2720-22 / Dated Nowshera the: 30/8/91

Copy for information to the:-

1. Head Teacher GPS Zadi Colony Nowshera.
2. A.S.D.E.O Halqa.
3. Office Copy.
4. Caandidets Concerned.



SUB DIVISIONAL EDUCATION OFFICER
(Male) Nowshera.

ATTESTED



Annex B (8)

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA

PHONE # 0923-9220228 , FAX # 0923-9220228

RETIREMENT ORDER

Mr. Raj Mali Chowkidar GPS Zaidi Colony Nowshera is hereby retired from Govt: Service w.e.f.01-07-2016 on attaining the age of Superannuation.

Under the provision of Government of Khyber Pakhtunkhwa finance Department letter No. FD (SR-IV) Vol.II datd 24-08-1983: sanction is hereby accorded to the grant of encashment of leave / retirement detail given below.

S #	Name of Official	Date of Retirement	Date of Birth	Date 1 st App:	Encashment of LPR	Total Service Length Y-M-D	Remarks
01	Raj Mali Chowkidar GPS Zaidi Colony Nowshera	01-07-2016	1956	01.07.1991	365 days on full pay	24-11-29	Retire from Service on Superannuation

/ District Education Officer (Male)
Nowshera

Endstt; No 1643-46 /DEO (M) NSR/EA-S/Retirement of Chowkidar/dated Nowshera 24-11-2016

Copy of the above is forwarded for information and necessary action to the:-

1. Senior District Account Officer, Nowshera.
2. Sub Divisional Education Officer (M) Nowshera.
3. ADO Circle Concerned.
4. Official Concerned.

ATTESTED

/ District Education Officer (Male)
Nowshera 24-11-2016

بجھت قیام دست لکھو ایجوکیشن اکیڈمی (پرائیویٹ) افسانہ تعلیم و ترقی

Annex C

9

دہلی دہلی ایجوکیشن اکیڈمی کے گروپ انٹرنیشنل
دی ہیڈ آف ایجوکیشن اکیڈمی، ایجوکیشن فاؤنڈیشن، ایجوکیشن اکیڈمی

صدا عالی

گزارش ہے کہ سال 7-1991 کو بھرتی

جو کبھی ایجوکیشن اکیڈمی کے گورنمنٹ پرائیویٹ اسکول زیدی کالونی نوشہرہ
مکمل ہیں بطور ایجوکیشن اکیڈمی کے ایجنٹ ایجنٹ ایجنٹ
اور میں گورنمنٹ ایجنٹ ایجنٹ ایجنٹ
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25/9/2019

ATTESTED
ASAT

بعد الت صا سرورں ٹریبونل اور

Appeal No. 12020

2020 منجانب راج صلی
بنام

راج صلی بنا DE-0 وغیرہ

مورخہ
مقدمہ
دعوی
جرم

باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ میں
 آن مقام کے لیے ~~راج صلی بنا DE-0 وغیرہ~~ کے لیے ~~راج صلی بنا DE-0 وغیرہ~~ کے لیے
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیے جواب دہی اور اقبال دعوی اور
 بصورت ڈگری کرنے اجراء اور صولی چیک روپیہ ارضی دعوی اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا ~~راج صلی بنا DE-0 وغیرہ~~ کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ نیز بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے باہر اختیار اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سامنتہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب اصرارے مقدمہ کے سب سے وہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا ~~راج صلی بنا DE-0 وغیرہ~~ کی پیروی
 مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 7 ماہ جنوری 2020

بمقام ~~راج صلی بنا DE-0 وغیرہ~~ کے لئے منظور ہے۔

(راج صلی)



محمد رفیق انیسٹریٹ

پیرس کورٹ آف پاکستان

سید محمد علی بلوچ ٹرسٹ ٹرڈ

214

تاج انٹرنیشنل صی رورڈ

MP

0915279292

0302-8885187

0332-8885187

کدالک جناب سرورہ نیشنل کمانڈ

راج ملی گورنمنٹ و سروس

App No 285/2020

درخواست سرکار جم کرانے فرجہ سکورٹی

جناب عالی اسٹریٹریٹس کلب قلعہ ریسال ہے

۱) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے آج نامہ پیشی فرجہ

۲) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۳) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۴) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۵) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۶) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۷) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۸) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

۹) کہہ اسٹریٹریٹس کلب قلعہ ریسال ہے اسٹریٹریٹس کلب قلعہ ریسال ہے

امیدوارم که این عنوان با این نام در نشریه
قرمان جاودگی

25/06/20

سازمان اسناد و کتابخانه ملی
جمهوری اسلامی ایران
اداره اسناد و کتابخانه ملی
کتابخانه ملی
کتابخانه ملی

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No 285/2020

Mr. Raj Mali.....Appellant/Petitioner

VERSUS

District Education Officer (M) Nowshera & Others..... Respondents

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S. No.	Documents	Annexure	Page No.
1.	Para wise Comments	01-02
2.	Affidavit	03

Respondent



District Education Officer (M)
Nowshera

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No 285/2020

Mr. Raj Mali.....Appellant/Petitioner

VERSUS

District Education Officer & othersRespondents

Respectively Sheweth

Written Comments/ reply on behalf of respondents

Preliminary Objections

1. That the appellant has no cause of action / locus Sandi to file the instant appeal.
2. That this honorable service Tribunal has got no jurisdiction to entertain the present appeal.
3. That the present appeal is bad for mis-joinder and nonjoinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this honorable Service Tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is not maintainable in its present form.

Factual Objections

1. Subject to proof.
2. Pertains to Record.
3. Pertains to Record.
4. Correct. But the Appellant have not submitted any appeal/application for group insurance, benevolent fund and education foundation fund and hence not released till date.
5. Incorrect. As explained in Para 4.
6. Incorrect. As explained in Para 4.

GROUND:

- A. Incorrect. Detail reply has been given in Para 4.
- B. Incorrect. Detail reply has been given in Para 4.
- C. Incorrect. Detail reply has been given in Para 4.
- D. Pertains to record.
- E. No comments.
- F. Incorrect. Detail reply has been given in Para 4.
- G. Incorrect. Detail reply has been given in Para 4.
- H. Incorrect. Detail reply has been given in Para 4.
- I. Incorrect. Detail reply has been given in Para 4.
- J. Incorrect. Detail reply has been given in Para 4.

It is therefore, requested before your honor that the present appeal is illegal, against facts and without force, may kindly be dismissed with cost.

Respondents

1- SDEO (M) Nowshera

2- District Education Officer (M)
Nowshera

3- Director E&SE
Khyber Pakhtunkhwa
Peshawar.

4- Secretary E&SE
Khyber Pakhtunkhwa
Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No 285/2020

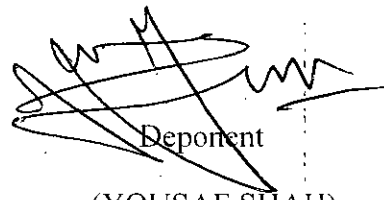
Mr. Raj Mali.....Appellant/Petitioner

VERSUS

District Education Officer & othersRespondents

AFFIDAVIT

I **Yousaf Shah** ADO Litigation DEO (M) Office Nowshera do solemnly affirmed and declare on oath that the contents of Para wise comments/ reply on behalf of respondents are true and correct to the best of my knowledge and that nothing has been concealed from this honorable Tribunal.


Deponent
(YOUSAF SHAH)

CNIC NO 17201-2126613-3

CELL NO 03219742173

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service Appeal No.285/2020

Mr. Raj Mali.....Petitioner.

V/S

District Education Officer (Male), Nowshera & Others.....Respondent

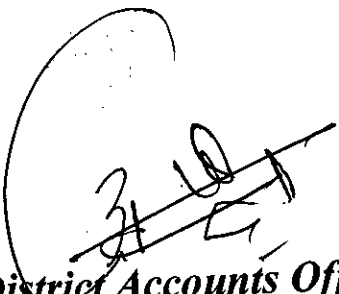
(Reply on behalf of Respondent No. 3 & 5)

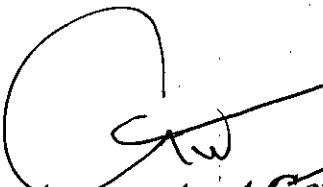
Respectfully Sheweth:-

Para 1 to 7:-

After detail scrutiny of the subject case, it is submitted that Group Insurance/Benevolent Fund of Provincial Government employees is dealt by Secretary Group Insurance/Benevolent Fund which comes under the control of Administration Department and Finance Department Khyber Pakhtunkhwa. They are in a better position to redress the grievance of the Petitioner. Respondent No. 3 & 5 only deducts the amount of Group Insurance/ Benevolent Fund on approved rates from the monthly salaries of the Government servants and is not authorized to make payment of Group Insurance/ Benevolent Fund amount to any Government Servant at the event of his death or retirement.

Keeping in view the above mentioned facts it is therefore, humbly requested that the name of Respondent No.3 & 5 may be deleted from the list of respondents.


District Accounts Officer
Nowshera


Accountant Gen
Khyber Pakhtun

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service Appeal No.285/2020

Mr. Raj Mali.....Petitioner.

V/S

District Education Officer (Male), Nowshera & Others.....Respondent

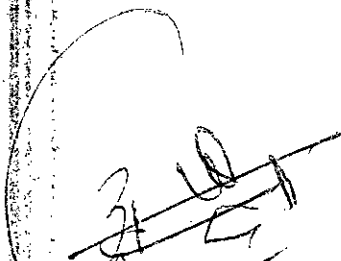
(Reply on behalf of Respondent No. 3 & 5)


Respectfully Sheweth:-

Para 1 to 7:-

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District Accounts Officer
Nowshera


Accountant General
Khyber Pakhtunkhwa