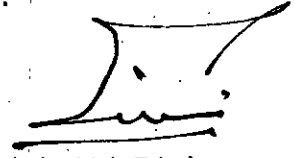


06.10.2022

Mr. Zakirullah, Advocate, junior of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is out of station today. Adjourned. To come up for preliminary hearing on 10.11.2022 before the S.B at Camp Court Swat.

**SCANNED
KPST
Peshawar**



(Salah-Ud-Din)
Member (J)
Camp Court Swat

10th Nov, 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for respondents present.

Junior to counsel for the appellant seeks adjournment on the ground that learned senior counsel is busy before the Hon'ble Peshawar High Court, Mingora Bench (Dar Ul Qaza) Swat. Last opportunity granted to argue the case on the next date positively. To come up for preliminary hearing on 08.12.2022 before S.B at camp court Swat.



(Kalim Arshad Khan)
Chairman
Camp Court Swat

07.06.2022

Appellant in person present:

On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the appellant did not appear before the court. Adjourned. To come up for preliminary hearing on 04.07.2022 before the S.B at camp court Swat.



(Mian Muhammad)
Member (E)
Camp Court Swat

04.07.2022

Nemo for appellant.

Notice be issued to appellant/counsel for 02.08.2022 for preliminary hearing before S.B at Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

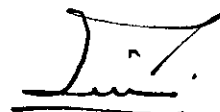
2.8.22

due to summer vacation the case is adjourned to 6-9-22 for the same.



06.09.2022

Learned counsel for the appellant present and sought adjournment on the ground that he has not made preparation for preliminary arguments. Adjourned. Last opportunity given. To come up for preliminary hearing on 06.10.2022 before the S.B at Camp Court Swat.



(Salah-Ud-Din)
Member (J)
Camp Court Swat

10.02.2022

Tour is hereby canceled. Therefore, case is adjourned to 07.04.2022 for the same as before at Camp Court Swat.




Reader

07.04.2022

Junior to counsel for the appellant present.

He made a request for adjournment as senior counsel for the appellant is busy in Peshawar High Court, Mingora Bench (Darul-Qaza) Swat. Adjourned. To come up for preliminary hearing on 06.06.2022 before S.B at Camp Court, Swat.




(Rozina Rehman)
Member (J)

06.06.2022

None for the appellant present.

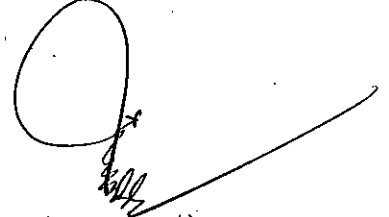
On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the ~~appellant~~ did not appear before the court. Adjourned. To come up for preliminary hearing on 07.06.2022 before the D.B at camp court Swat.



(Mian Muhammad)
Member(E)
Camp Court Swat

10.12.2021

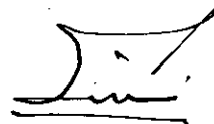
Learned counsel for the appellant present and submitted an application to transfer the instant appeal to Camp Court, Swat as the appellant belongs to District Chitral and his counsel is practicing at Swat, therefore, it will be convenient for them to appear at Camp Court Swat. The application is accepted. To come up for preliminary hearing before S.B on 05.01.2022 at Camp Court Swat.



(Mian Muhammad)
Member (E)

05.01.2022

Mr. Zakir Ullah, junior of learned counsel for the appellant present and sought adjournment on the ground that learned counsel for the appellant is unable to appear before the Tribunal today due to closure of Lowari Tunnel due to snow fall. Adjourned. To come up for preliminary hearing on 10.02.2022 before the S.B at Camp Court Swat.



(Salah-Ud-Din)
Member (J)
Camp Court Swat

Form- A

FORM OF ORDER SHEET

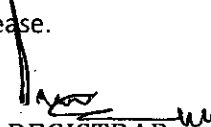

10.12.2021
Court of

Learned counsel for the appellant present and

submitted an application to transfer the instant

Case No.-

7680/2021 appeal to Camp Court Swat as the appellant belongs

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	to District Chitral and his counsel is practicing at Swat, therefore, it will be convenient for them to appear at Camp Court ³ Swat. The application is
1-	22/10/2021	accepted. To come up for preliminary hearing before The appeal of Mr. Hydar Hussain resubmitted today by Mr. S.B on 05.01.2022 at Camp Court Swat. Rahimullah Chitrali Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.  REGISTRAR
2-		This case is entrusted S. Bench at Peshawar for preliminary hearing (Mian Muhammad) to be put there on <u>10/2/21</u> .  CHAIRMAN

The appeal of Mr. Hyder Hussain son of Muhammad Hussain PSHT GPS Kohat District Upper Chitral received today i.e. on 12.10.2021 is incomplete on the following score which is returned to the counsel for the appellants 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. Annexures of the appeal may be attested. ✓
4. Copies of appointment and regularization order mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
5. One more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal

No. 2054 /S.T,

Dt. 12/10 /2021

REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rahimullah Chitrali Adv. Pesh.

Sir,
It is hereby submitted
for your kind information
that regularization order of
the applicant is not available
however the same will be
produced at the time of Arguments
12/10/21

objection removed
Resubmitted, please
@Counsel
22/10/21

BEFORE SERVICE TRIBUNAL KPK PESHAWAR

CHECK LIST

S.No	Case Title:	Haidr Hussain Versus	Government KPK		
1	Case is duly signed.			Yes <input checked="" type="checkbox"/>	No
2	The lawn under which the case is preferred has been mentioned.			Yes <input checked="" type="checkbox"/>	No
3	Approved file cover is used.			Yes <input checked="" type="checkbox"/>	No
4	Affidavit is duly attested and appended.			Yes <input checked="" type="checkbox"/>	No
5	Copies of annexure(s) are properly paged / numbered according to index.			Yes <input checked="" type="checkbox"/>	No
6	Copies of annexure(s) are legible and attested. If not, then better copies duly attested have been annexed.			Yes <input checked="" type="checkbox"/>	No
7	Certified copies of all the requisite documents have been filed.			Yes <input checked="" type="checkbox"/>	No
8	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.			Yes	No
9	Case is within time.			Yes <input checked="" type="checkbox"/>	No
10	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.			Yes <input checked="" type="checkbox"/>	No
11	Court fee in shape of stamp paper is affixed. (For writ Rs. 500, for other was required).			Yes	No
12	Power of attorney is in proper form.			Yes	No
13	Memo of addresses filed.			Yes <input checked="" type="checkbox"/>	No
14	List of books mentioned in the petition.			Yes <input checked="" type="checkbox"/>	No
15	The requisite number of spare copies attached. (Writ Petition: Nos, Civil Appeal (SB-1, DB-2) Civil Revision (SB-1, DB-2)			Yes <input checked="" type="checkbox"/>	No
16	Case (Revision/appeal/petition etc.) is filed on the prescribed form.			Yes <input checked="" type="checkbox"/>	No
17	Power of attorney is attested by jail authority (for jail prisoner only).			Yes	No

It is certified that formalities / documents as requires in column 2 to 18 above, have been fulfilled.

Date: 22/10/2021

Signature 
Rahim Ullah Chitrali & Muti Ur Rehman
Advocate Peshawar

For office use only.

Case No. _____

Case received on: _____

Complete in all respect; Yes/No (If no the Grounds) _____

Date in Court: _____

Signature: _____

(Reader)

Countersigned: _____

Date: _____
(Deputy Registrar)

BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No.....7640...../2021

Hyder Hussain son of Muhammad Hussain PHST GPS Khot , District
Upper Chitral.

.... Appellant

SCANNED
KPST
Peshawar

VERSUS

Government of KP through Secretary Education&others Respondents

INDEX

S.No.	Description of Documents	Annex	Pages
1.	Appeal with certificate		1-4
2.	Affidavit		5
3.	Copies of CNIC, List, Pay slip, letters dated 21-8-2019,21-12-2019,15-5-2020 ,31-12-2020	A to J	6-18
4.	Vakalatnama		19


Appellant

Through


Rahim Ullah Chitrali

Advocate High Court

03439540004

BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No.....7640...../2021

Diary No. 2724

Dated 12-10-2021

Hyder Hussain son of Muhammad Hussain PHST GPS Khot, District Upper
Chitral.

..... Appellant

VERSUS

1. The Secretary Education (E&SE) Khyber Pakhtunkhaw Peshawar.
2. The Director Education (E&SE) Khyber Pakhtunkhaw Peshawar.
3. The District Education officer (E&SE) Upper Chitral.

..... Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974, FOR GRANTING BACK BENEFIT W. E. F SINCE
INITIAL ORDER DATED 10-11-1988 TILL DATED OF
REGULARIZATION 27-10-1992, AND TO ISSUE ORDER/NOTIFICATION
FOR REGULARIZATION OF SERVICES OF THE PETITIONER BY
EXTENDING ALL THE BENEFITS FROM THE DATE OF HIS INITIAL
APPOINTMENT DATED 10-11-1988 TILL HIS REGULAR
APPOINTMENT DATED 27-10-1992 ALONG WITH ALL
CONSEQUENTIAL BENEFITS AND THE SENIORITY OF THE SAID
PERIOD I.E 10-11-1988 TILL DATED OF REGULARIZATION 27-10-1992
ALSO BE COUNTED TOWARDS HIS LENGTH OF SERVICE, AGAINST
THE ORDER/ACTION OF THE RESPONDENTS THE PETITIONER
FILED DEPARMENTAL APPEAL BEFORE RESPODENT NO. 3² and 2
AND THE SAME WAS NOT DECIDED HENCE THIS APPEAL, HENCE
THE INSTANT APPEAL.

Prayer in Appeal:

ON ACCEPTANCE OF THE INSTANT APPEAL THE RESPONDENTS
MAY KINDLY BE DIRECTED TO GRANT /AWARDED BACK BENEFIT
W. E. F SINCE INITIAL ORDER DATED 10-11-1988 TILL DATED OF
REGULARIZATION 27-10-1992, AND TO ISSUE
ORDER/NOTIFICATION FOR REGULARIZATION OF SERVICES OF
THE PETITIONER BY EXTENDING ALL THE BENEFITS FROM THE
DATE OF HIS INITIAL APPOINTMENT DATED 10-11-1988 TILL HIS

filed to-day

Registrar

12/10/2021

REGULAR APPOINTMENT DATED 27-10-1992 ALONG WITH ALL CONSEQUENTIAL BENEFITS AND THE SENIORITY OF THE SAID PERIOD 10-11-1988 TILL DATED OF REGULARIZATION 27-10-1992 ALSO BE COUNTED TOWARDS HIS LENGTH OF SERVICE

ANY OTHER REMEDY WHICH DEEMS FIT BY HIS HON'BLE TRIBUNAL IN THE INTEREST OF JUSTICE, MAY ALSO BE GRANTED IN FAVOUR OF APPELLANT.

Respectfully Sheweth,

1. That appellant joined the education department in the year 1988 and performed his duties up to the entire satisfaction of his superior and no complained has been filed against the appellant.
2. That the appellant was appointed on 10-11-1988 as untrained teacher as PST on temporary basis and subsequently conformed in the year 1992.
3. That after conformation the appellant demanded increment, seniority etc from the department prior to the period of his regularization/conformation but the department declined the same with remarks that appellant was not entitled because the appellant served as untrained teacher .
4. That for the grant of back benefits ,the petitioner thoroughly visited the office of respondent and filed departmental appeal who on either pretexts lingered the matter on, in response to which, the petitioner was verbally advised to go to the Court of law. Hence having available with no alternative, adequate and efficacious remedy, the petitioner is constrained, to approach this Honorable Court, through the present appeal, inter alia, on the following grounds.(Copies of CNIC, List, Pay slip, letters dated 21-8-2019,21-12-2019,15-5-2020 ,31-12-2020 are attached as marked annexer A to J)

GROUNDS:-

- A) That the impugned action / inaction rather the denial of the respondents from the all back benefits to the petitioner prior to the untrained teacher period of his conformation is

arbitrary, illegal, without lawful authority, ultra vires the law, rules and the relevant policy governing the subject matter hence, void ab initio.

- B) That the seniority is one of the factor which is to be considered for promotion /pension etc but the respondents did not considered the said aspect which act of the respondents are not the spirit of existing rule.
- C) That since the petitioner has served the respondent department for about thirty three years with no break or interval and with no negative voice ever raised by any of the quarters regarding his performance and discharging her duties, that the petitioner, is deserving for all related benefits.
- D) That the impugned action / inaction of the respondents is based on discrimination and malafide intentions for achieving their ulterior motives.
- E) Because the appellat request for back benefit in shape seniority etc has been kept aside by the department, without decided the departmental appeal of the appellat .
- F) That the act of refusing with all back benefit is against the right and alien to doctrine of nature justice.
- G) That the impugned action / inaction of the respondents are not only suffering from law but the same is also against the fundamental rights of the petitioner guaranteed by the Constitution of the Islamic Republic of Pakistan, 1973.
- H) That, others grounds, with the leave of this Honorable Court, will be raised at the time of hearing.

PRAYER

IT IS THEREFORE HUMBLY PRAYED THAT ON ACCEPTANCE OF THE INSTANT APPEAL THE RESPONDENTS MAY KINDLY BE DIRECTED TO GRANT /AWARDED BACK BENEFIT W .E. F SINCE INITIAL ORDER DATED 10-11-1988 TILL DATED OF

(4)

REGULARIZATION 27-10-1992, AND TO ISSUE ORDER/NOTIFICATION FOR REGULARIZATION OF SERVICES OF THE PETITIONER BY EXTENDING ALL THE BENEFITS FROM THE DATE OF HIS INITIAL APPOINTMENT DATED 10-11-1988 TILL HIS REGULAR APPOINTMENT DATED 27-10-1992 ALONG WITH ALL CONSEQUENTIAL BENEFITS AND THE SENIORITY OF THE SAID PERIOD 10-11-1988 TILL DATED OF REGULARIZATION 27-10-1992 ALSO BE COUNTED TOWARDS HIS LENGTH OF SERVICE

ANY OTHER REMEDY WHICH DEEMS FIT BY HIS HON'BLE TRIBUNAL IN THE INTEREST OF JUSTICE, MAY ALSO BE GRANTED IN FAVOUR OF APPELLANT.

Appellant

19 Paid

Through

[Signature]
Rahim Ullah Chitrali
Advocate High Court

Certificate:-

It is certified that no such appeal is pending or decided by this Hon, able Court
Advocate High Court

List of Books:-

- a. Service Laws
- b. Case law according to need

[Signature]
Advocate High Court

5

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

Appeal No.....of 2021

Haider HussainAppellant

VERSUS

Govt. of KPK and othersRespondents

AFFIDAVIT

I, Haider Hussain S/O Muhammad Hussain R/O Mohallah Hone Khot Payeen, Tehsil Mastuj, District Chitral NIC No.15202-15202-0843511-3, Tel: 03429034132, do hereby solemnly affirm and declare that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this august court. I hereby further affirm and state that no case on the subject matter is pending in any other court or tribunal.

Deponent:



Haider Hussain



**Hidayat ul Islam
Advocate
Oath Commissioner
Distt. Court Chitral**

13/07/021

(7)

Annex

B

Sen. No	Name of Teacher	Father Name	Qualification			Station	Design	D.O.B	Date of Appointment	Date of Regularization	Aggregate	Deficiency
			SSC/HSSC/B.A	M.A/M.Phil	Professional							
1	Noor Bahar Shah	Khuja Hassan	F.A		PTC	Muzain Owir	PSHT	1/2/1963	12/12/1982	12/12/1982		SSC DMC & Appt+Pro Order
2	Abdur Rehman	Shapir Khan	FA		PTC	GPS Nishku	PSHT	20/5/1963	7/10/1984	7/10/1984		
3	Mazharul Haq	Rasool Barkat	SSC		PTC	GPS Riri Owir	PST	2/1/1963	18-10-1984	18-10-1984		
4	Noor Shalida Din	Aman Ud-Din	SSC		PTC	GPS Nishku Bala	PST	23-06-1963	11/8/1985	11/8/1985		
5	Mir Ajam Khan	Muqadas Khan	SSC		PTC	GPS Kushum Bichan	PST	4/12/1963	18-09-1985	18-09-1985		
6	Atta Ur Rehman	Wazir Hayat	FA			GPS Awi	PSHT	6/3/1962	20-10-1982	25/01/1986		BA Deg & PTC Certi & NOC, Appt+Pro Order
7	Shah Muhammad	Mir Had	SSC	19-04	PTC	GPS Emith	PSHT	5/3/1963	19-04-1982	25/1/1986		NOC for PTC
8	Masood ul Hasan	Qazi Muhammad Murad	FA		PTC	Meragram No.1	PSHT	1/1/1965	20-09-1986	20-09-1986		NOC for BA & Appt+Pro Order
9	Safdar Nayab Khan	Ziyarat Khan	BA Arts		PTC	GPS Mastuj No.1	PSHT	2/4/1966	20/9/1986	26/9/1986		Appt+Pro Order
10	Saeedullah	Yadgari	F.A		PTC	GPS Kosht Bala No2	PSHT	1/4/1965	23/9/1986	23/9/1986		
11	Islam Ud Din	Zan Zahi	FA		PTC/CT	GPS Dok Ghat	PSHT	5/5/1966	23/9/1986	23/9/1986		BA Degree & Appt+Pro Order
12	Jamir Ullah	Hussain Khan	BA		PTC	GPS Sarwarabad	PSHT	7/1/1968	23/9/1986	23/9/1986		
13	Hassan Wali Shah	Gulab Shah	F.A		PTC	GPS Warijun No.1	PSHT	15/08/1961	22/02/1982	25/5/1987		Appt+Pro Order
14	Mumtaz Hussain	Maman	BA		PTC	GPS Parpish	PSHT	30/12/1963	10/2/1982	26/5/1987		
15	Inayat Habi	Mohmat Ullah	F.A		PTC	Odir Melp	PSHT	3/2/1967	21/9/1987	21/9/1987		Appt+Pro Order
16	Mir Ghazi	Sher Lali	F.A		PTC	GPS Washich	PSHT	1/10/1964	31/10/1987	31/10/1987		Appt+Pro Order
17	Noor Azam Khan	Muqadas Khan	F.A		PTC	GPS Bichan Kushum	PSHT	1/10/1963	20/2/1982	1/8/1988		Appt+Pro Order

8

18	Syed Ahmad Shah	Muhammad Yaqub	F.A		PTC	GPS Zezdi	PSHT	24-02-1965	29/12/1984	1/8/1988		NOC for BA & CT. Appt+Pro Order
19	Sardar	Eid Ameen Khan	BA		PTC	GPS Zaini	PSHT	12/4/1965	21/10/1984	1/8/1988		
20	Asmat Wali Khan	Sher Wali Khan	FA		PST	GPS Istaru	PSHT	4/5/1964	11/8/1985	15/8/1988		NOC for BA. Appt+Pro Order
21	Liaquat Hussain	Muhammad Takbir Khan	F.A		PTC	GPS Greenlasht	PSHT	8/2/1964	14/9/1988	14/9/1988		MA Degree & NOC for MA & BA
22	Abdur Rahman	Afsar Khan	F.A		PTC	GPS Kosht Bala Nol	PSHT	19-06-1966	14-09-1988	14-9-1988		NOC for BA + Appt order
23	Fazal Rabi	Ghulam Habib	FA		PTC	GPS Lamkushum	PSHT	15/06/1967	14/09/1988	14/09/1988		Appt+Pro Order
24	Ghulam Habib	Rab Nawaz Khan	BA		PTC	GPS Khruzg	PSHT	18/02/1961	10/11/1988	10/11/1988		Pro Order
25	Assad ur Rehman	Abdur Rehman	F.A		PTC	GPS Pakhturi Owir	PSHT	1/4/1964	14/9/1988	17/1/1990		
26	Abdul Hamid Khan	Abdul Majeed Khan	F.A		PTC	GPS Zait	PSHT	21/2/1967	14/3/1990	14/3/1990		Appt+Pro Order
27	Abdul Aziz	Abdul Haq	F.A		PTC	GPS Barum	PSHT	4/2/1962	3/4/1990	3/4/1990		Appt+Pro Order
28	Taj Ahmad Khan	Rafi Khan	F.A		PTC/CT	GPS Nodragh	SPST	24/11/1964	14/9/1988	14/11/1990		NOC for BA, Appt+Pro Order
29	Haider Nawaz Khan	Gulab Khan	F.A		PTC	GPS Khot Payeen	PSHT	6/4/1964	23/5/1987	30/11/1990		Degree & NOC for BA, Appt+Pro Order
30	Namatullah	Noor Wazir Shah	F.A		PTC/CT	GPS Parech	PSHT	30/6/1964	9/6/1987	30/11/1990		
31	Nadir Aman	Maqsad Gul	BA		PTC, B.Ed	GPS Raycen (B)	PSHT	25/3/1969	7/1/1991	7/1/1991		NOC for CT, Appt+Pro Order
32	Akbar Azim Shah	Mir Azeem	BA		PTC, B.Ed	GPS Parwak (B)	PSHT	2/12/1969	7/1/1991	7/1/1991		

Own
ATTESTED

33	Aziz Ud Din	Iqbal Khan	F.A		PTC	GPS Nisurgole	PSHT	1/1/1961	16/12/1989	22/10/1991		PTC Certificate. Appt+Pro Order
34	Miqdar Ali Khan	Hakim Khan	BA		PTC, B.Ed	Breep No.2	PSHT	12/1/1963	15/5/1988	22/10/1991		CT, Appt+Pro Order
35	Aziz Muhammad	Mir Badad Shah	BA	MA	PTC, Bed	GPS Rabat Khot	PSHT	4/5/1963	14/9/1988	22/10/1991		
36	Fazl Karim	Amokht Ali Khan	F.A		PTC/B.Ed	GPS Parwak (P)	PSHT	8/7/1965	14/9/1988	22/10/1991		NOC for BA
37	Nazir Ahmad	Sher Ahmad Khan	BA		PTC, B.Ed	GPS Uchutti Warijun	PSHT	15-08-1966	31/7/1989	22-10-1991		NOC for PTC
38	Ghulam Mustafa	Sher Faraz Khan	BA		PTC	GPS Booni gole	PSHT	2/2/1967	12/6/1990	22/10/1991		
39	Sher Bacha Khan	Buli Khan	BA Arts	MA	PTC/CT/B.Ed	GPS Bang	PSHT	10/3/1967	12/10/1989	22/10/1991		
40	Sifat Madad	Mazen Madad	BA Arts		PTC/CT/B.Ed	GPS Dewser	PSHT	5/6/1969	12/10/1989	22/10/1991		NOC for MA, Appt+Pro Order
41	Israr Ud Din	Shah Kapoat	BA	MA Islami	PTC, CT, B.Ed, M.Ed	GPS Meragram II	PSHT	4/7/1969	15/05/1988	22/10/1991		
42	Afzal Muhammad	Juma Khan	BA Arts		PTC/CT/B.Ed	GPS KruiJunali	PSHT	1/1/1967	24/3/1992	24/3/1992		MA Degree
43	Muhammad Afzal	Noor Muhammad Shah	F.A			GPS Warijun No 2	PSHT	8/2/1968	24/3/1992	24/3/1992		All Documents with NOC & Appt+Pro Order
44	Muhammad Nizar Khan	Mir Bahar Khan	BA		PTC/B.Ed	GPS Booni No.1	PSHT	1/3/1968	24/3/1992	24/3/1992		
45	Sharaf ud Din	Muhammad Yunus	BA Arts	MA Islami	PTC/Bed	GPS Awi Owir	PSHT	10/1/1969	24/3/1992	24/3/1992		
46	Muhammad Ali Khan	Aman Ali Khan	BA		PTC/CT/B.Ed	GPS Mordir	PSHT	1/3/1969	24/3/1992	24/3/1992		
47	Abdul Jabbar	Murad Ali Khan	BA		PTC	GPS Rayeen	PSHT	1/3/1969	24/3/1992	24/3/1992		
48	Niaz Ahmad	Ghairat Baig	BA Arts	MA	PTC, B.Ed	GPS Khozh	PSHT	1/2/1970	24/3/1992	24/3/1992		
49	Rahmat Fazal Khan	Aman Ullah	F.A		PTC	GPS Nichagh Owir	PSHT	28-03-1970	24/3/1992	24/3/1992		BA Degree & NOC

Qulb
ATC

10

50	Akram Allah Jan	Mirza Hasil	BA	MA	PTC/B.Ed	GPS Nialashi	PSHT	20-03-1971	24/3/1992	24/3/1992		SSC Certificate + Appt+Pro Order
51	Fazle Rahim	Abdul aziz	F.A	MA	PTC/B'Ed	GPS Shotkhar	PSHT	2/2/1972	24/3/1992	24/3/1992		NOC for BA & Appt+Pro Order
52	Rajul Khan	Ajab Gul	BA		PTC	GPS Phorth	PSHT	14/08/1965	23/4/1992	23/4/1992		
53	Yaqoob	Abdul Munir	BA	MA	PTC/CT/B.Ed	GPS Nogram	PSHT	12/10/1966	23/4/1992	23/4/1992		
54	Kifayatullah	Latif Ullah	BA		PTC	GPS Shabronz	PSHT	15/4/1967	23/4/1992	23/4/1992		
55	Sardar Wali Baig	Sher Baig	F.A		PTC	GPS Shongush Owir	PSHT	1/1/1969	23/4/1992	23/4/1992		
56	Abdul Wadood Shah	Abdul Karim	F.A		PTC/CT	GPS Shuch	PSHT	1/6/1970	23/4/1992	23/4/1992		NOC for BA & B.Ed, Appt+Pro Order
57	Muhammad Shah	Sardar Khan	SSC		PTC	GPS Shagroom	PSHT	1/9/1970	23/4/1992	23/4/1992		NOC for FA, Appt+Pro Order
58	Muhammad Khalil Shah	M.Nasir Shah	BA		PTC, Bed	GPS Chuinj	PSHT	5/1/1971	23/4/1992	23/4/1992		
59	Haidar Hussain	Muhammad Hussain	BA	MA Islami	PTC/CT, B.Ed	GPS Khot	PSHT	1/2/1963	10/11/1988	27/10/1992		
60	Kiram ud Din	Nadirur Rahman	FA		PTC	GPS werkup	PSHT	20-04-1965	24-08-1989	27-10-1992		
61	Asif Ali	Nadir Murad Khan	B.A		PTC	GPS Dizg	PSHT	12/1/1968	18/11/1989	27/10/1992		
62	Noor Zaman	Gul Azeem Shah	BA Arts	MA	PTC/CT/B.Ed	GPS Samagole	PSHT	25/5/1963	18/11/1989	22/11/1992		
63	Safiat Khan	Bap Khan	BA		PTC, CT, B.Ed	GPS Kushum	PSHT	1/3/1967	14/9/1988	22/11/1992		
64	Osman Khan	Abdul Qadir	BA		PTC/CT/B.Ed	GPS Kushum (B)	PSHT	2/1/1970	12/10/1989	22/11/1992		
65	Anwarul Muminin	Abdul Muzafar Khan	F.A		PTC	GPS Zondrangram	PSHT	1/12/1965	3/12/1992	3/12/1992		SSC Certificate, Appt+Pro Order
66	Abdul Qayum Shah	Ali Ghulam Shah	F.A		PTC	GPS Lone	PSHT	25/3/1970	3/12/1992	3/12/1992		NOC for BA, Appt+Pro Order

(Handwritten signature)

Dist. Govt. KP-Provincial
District Accounts Office Chitral Upper
Monthly Salary Statement (October-2020)

11



Ann. C

Personal Information of Mr HAIDER HUSSAIN d/w/s of MUHAMMAD HUSSAIN

Personnel Number: 00316496 CNIC: 1520208435113 NTN:
 Date of Birth: 01.02.1963 Entry into Govt. Service: 26.11.1988 Length of Service: 31 Years 11 Months 007 Days

Employment Category: Vocational Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 81013567-DISTRICT GOVERNMENT KHYBE

DDO Code: CU6197-Govt Primay Schools (Male) Torkoh/M Chitral Upper

Payroll Section: 001 GPF Section: 001 Cash Center: 15

GPF A/C No: EDUCL003141 Interest Applied: Yes **GPF Balance: 332,049.00**

Vendor Number: 30157985 - HAIDER HUSSAIN (PST) DDO MALE EDU: BOONI CHITRAL

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1917	UAA-CHITRAL 40%(1-15)	1,700.00
2148	15% Adhoc Relief All-2013	950.00	2199	Adhoc Relief Allow @10%	637.00
2211	Adhoc Relief All 2016 10%	3,255.00	2224	Adhoc Relief All 2017 10%	4,272.00
2247	Adhoc Relief All 2018 10%	4,272.00	2264	Adhoc Relief All 2019 10%	4,272.00
5011	Adj Conveyance Allowance	5,712.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-973.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	624,000.00	-18,000.00	552,000.00

Deductions - Income Tax

Payable: 11,150.95 Recovered till OCT-2020: 3,370.00 Exempted: 0.41- Recoverable: 7,781.36

Gross Pay (Rs.): 74,535.00 Deductions: (Rs.): -23,188.00 Net Pay: (Rs.): 51,347.00

Payee Name: HAIDER HUSSAIN

Account Number: 157-7

Bank Details: NATIONAL BANK OF PAKISTAN, 231866 NBP BOONI BOONI, BOONI

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: CHITRAL

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: haiderhussainpsht@gmail.com

Haider Hussain
ATTESTED

(13)

... to check the Original
... before handing

... age in their age

Encl. No. 2-13-37

Copy forwarded to

- 1. District Accounts Officer, Chitt...
- 2-3. Sub Divisional Education Officer

... the, 10.11 /1988

Wing
ATTACHED

OFFICER OF THE DISTRICT EDUCATION OFFICER MALE, CHITRAL

The following appointment of constrained RA, FA and SSCE, passed candidates are hereby appointed on temporary basis in the best interest of public service in BPS-7 Rs. 780-... fixed plus usual allowances as available under the rules with effect from the date of their over charge in the Schools noted against their names sub-S.No. Name of Candidate.

<u>SR.No.</u>	<u>Name & Father's Name</u>	<u>Place of Post</u>	<u>Remark</u>
1	Muhammad Tahir Shah S/o Rahmat Tahir Shah R/o Dalech, Distt Chitral	GMS: Domil (Chitral)	Against PTC post.
2	Shah Manan Shah S/o Ali Muhammad R/o Kushum District Chitral	GPS Paresch (Chitral)	Against newly created PTC post.
3	Mukhtar ud Din S/o MEhran Khan R/o Warijun, District Chitral	GPS Breshenghen (Chitral)	-do-
4	Shahid Alam S/o Aman Ullah Khan R/o District Chitral	GPS:..... (Chitral)	Against newly created PTC post.
5	Ghulam Ullah S/o Rab Nawaz Khan R/o Kosht District Chitral	GPS Parechi (Chitral)	Against vacant PTC Post
6	Bahadar Khan S/o Akbar Khan R/o Kesu District Chitral	GPS Nagar (Chitral)	
7	Sami ur Rehman S/o Abdul Haji R/o Gohkir District Chitral	GPS Muzdeh Goshkir (Chitral)	Against newly created PTC post.
8	Abdul RAzaq S/o Mehran Jee R/o Kaju District Chitral	GPS Parasan, (Chitral)	Against vacant PTC Post
9	Sher Mayen Khan R/oAjmal Khan R/o Pesh District Chitral	GPS Andrah Torknow (Chitral)	Against newly created PTC post.
10	HAider Hussain S/o Muhammad Hussain R/o Khot District Chitral	GPS Andrah Torknow (Chitral)	-do-

AHOS ted
Cajp

Terms and Conditions:

01. Charge report should be submitted to all concerned.
02. No TA/DA is allowed.
03. The appointment are made as purely temporary basis and liable to termination at any time without notice and assigning and any reason.
04. In case of resignation they will have to submit the months pay in lieu thereof the Govt. service.
05. The candidate shall produce their Health and

06. are required to check the original domicile and certificate of the candidates before handing over charge.
07. The candidate shall not have handed over charge of their age if their age over years below to below.

()
DISTRICT EDUCATION OFFICER
(MALE CHITRAL)

Endst. No.12413-36/A-18/..... dated 10.11.1988.
Copy to :-

1. District Accounts Officer Chitral.
2. Sub-Divisional Education Officer (Male Chitral and Mastuj Boomi).
3. Headmaster concerned and Incharge Treasury concerned Primary School.
4. Candidate Concerned.
5. General File in the Local Office.

Attested
CAIR

DISTRICT EDUCATION OFFICER
(MALE CHITRAL)

تدریس صواب دی سی اور ص (سر دائرہ) صبح 12 بجے چرالہ۔

(14)

صواب عالی۔

مضمون: فردی و Seniority list میں آئے لانے اور untrained period 1989 میں شامل کرنے کی
Reminders اسٹیڈی کا دوبارہ

یادداشت: چونکہ فردی نے اقبنا ب کی فہرست میں 30.10.2019 کو آئی درخواست

جس وقت کہ فردی نے untrained period میں شامل کیا جائے۔ تاکہ فردی کا Seniority list میں نظر آئے آجائے۔

اس درخواست کا نتیجے میں فردی کو کوئی جواب ملنے کی صورت میں آج دوبارہ Reminder آئے اس کی فہرست عالیہ میں جمع دیا تاکہ فردی کی شہوانی ہو سکے۔

امید ہے کہ اسے اسے فردی کے اس بارے میں دلچسپی ہے تاکہ اسے اس بارے میں فوراً مطلع کیا جائے۔

شکرہ

الطاف حسین
صدر مجلس
P.S.T
کوٹ
Dated: 21.12.2019.

(14)

خدمت جناب DEO صاحب (مردانہ) ضلع حوالہ
جناب عالی! (15)
Annex D

جو نام فروع 26-11-1988 کو عدلیہ ایجوکیشن حوالہ میں کمیٹی P.T.C. میں (B.P.S.7) تقریر ہوا تھا۔ اس وقت Untrained تقریری ہوتی تھی۔ اس وقت
15/10/1992 کو P.T.C. ٹرینڈنگ کامیابی سے مکمل کیا۔
اس کے بعد ان مذکورہ کاروں کا Untrained period کا نام arrear سالانہ
رٹرنسٹ دیا گیا۔

لیکن Seniority میں مذکورہ کاروں کا Untrained period
شامل نہیں کیا گیا۔

لہذا عرض ہے کہ مذکورہ کاروں کا Untrained period کو
Service میں شامل کیا جائے۔ اس سے اس کے 28/11/1988 سے
شمار کیا جائے۔

صدر عین
P.S.H.T.
P.S.
Dated: 24/08/2019

RECEIVED

NOTICE (1)
for loss or damage
articles, unless
(2)

(13)

ذریعہ (13) کے تحت (13) کے تحت (13) کے تحت

Ann. B

17

درخواست گزار کے ساتھ ساتھ
درخواست گزار کے ساتھ ساتھ
20/19, 21/19, 15/20

جس کے تحت - جس کے تحت -
appraised ہوئے۔ سال 1992 کو (13/18) کے تحت
Regulated ہوئے۔ مع Finance Dept کے تحت
30/09 کے تحت جس کے ساتھ ساتھ
مکمل طور پر اس سے اس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ

جس کے تحت - جس کے تحت -
جس کے ساتھ ساتھ جس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ

ATTESTED

کامیابی کے ساتھ ساتھ

جس کے ساتھ ساتھ جس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ
جس کے ساتھ ساتھ جس کے ساتھ ساتھ

2020/11/21

(#)

(18)

Ann. H

No. 1192

For Insurance: Notices see reverse.
Stamps affixed except in case of
RGL16435108: not more than
initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Received a registered addressed to DELU Date Stamp 50/

Initials of Receiving Officer [Signature] Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. (in words)

Insured for Rs. [Signature] (in figures)

Insurance fee Rs. 1/2 Ps. 2/4 Weight 2/4 Grams (in words)

Name and address of sender [Signature]

3/1/20

For Insurance: Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Received a registered addressed to DELU Date Stamp 7/1/20

Initials of Receiving Officer [Signature] Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary. (in words)

Insured for Rs. (in figures) [Signature] (in words)

If insured: Insurance fee Rs. 1/2 Ps. 2/4 Weight 2/4 Kilo Grams (in words)

Name and address of sender [Signature]

ATTACHED

11. 50 - 30/2

- v) That the one brother and mother of the complainant are a necessary party as their absence no effective order could passed.
- vi) That the neither any special power of attorney on behalf brother and mother of the complainant placed on file nor made them as party in the said complaint .
- vii) That the KP ombudsperson has failed to compare documentary evidence of the parties properly and as such the Impugned order is the result of mis-appreciation of evidence on record.
- viii) That the judgment & order of the KP ombudsperson ,did not qualify the requirements of judgment prescribed by law.
- ix) That the Impugned judgment & order is the result of mis-reading and non-reading of record.
- x) That the learned KP ombudsperson is badly failed to look in to the matter in true and proper sense. Hence the judgment & order is against the facts and circumstances.
- xi) That the Judgment & order of the learned lower court is based on surmises and conjectures.
- xii) That the complaint of the respondent is not maintainable in the present form, because the predecessor of the respondent had given the lower portion of property in question to the petitioner through gift-deed bil eiwaz dated 27-01-2012 in presence of two witnesses in consideration of legal services and administration of immovable property of Donor, furthermore the petitioner had served in various other matters of daily life to the parents of respondent and his family members, but the trial court ignore this aspect of the case and accepted the complaint of the respondent in very hasty manner, hence, not tenable in the eyes of law.
- xiii) That the impugned order / decision is based on assumptions & presumptions.

حکومت پنجاب

(17)

جی۔ پی۔ اے۔ 250 ویں نمبر (11) سٹیٹ بینک آف پاکستان

درخواست برآمد حکم صادر کرنے کی نسبت
درخواست برآمد کی تاریخ 15/20
12/19 اور 21/19

جی۔ پی۔ اے۔ سٹیٹ بینک آف پاکستان - کہ سٹیٹ بینک آف پاکستان 26 کو رجسٹرڈ PTC
appraised ہوئے۔ سال 1992 کو ریگولیشن 18/81 کے تحت
Reguler ہوئے۔ حکم Finance Dept حوالہ فرم
30/89 کے تحت سٹیٹ بینک کو مالی ادارے increments کی نسبت
سٹیٹ بینک کے سرویس میں show نہیں کی گئی ہے تاکہ
سٹیٹ بینک کو سرویس سینیورٹی و سینیورٹی حاصل ہو سکے۔
رہے سٹیٹ بینک کی گورننگ سٹرکچر میں ہے۔

جی۔ پی۔ اے۔ سٹیٹ بینک آف پاکستان کے گورننگ ڈائریکٹریٹ کی نسبت ایسا ریکورڈ درخواست
30/89 فرم 21/19 - 30/89 - فرم 15/20 کے تحت
ہے۔ سٹیٹ بینک درخواستوں کی نسبت کوئی حثیت یا منافی
جو اب اعلیٰ عدالت میں لڑی ہو۔ حثیت میں نہ سٹیٹ بینک کی
کامیابی کے ساتھ ساتھ ہی ہے۔

ATTESTED

کاپی محفوظ رکھیں۔

حکومت پنجاب کے درخواستوں میں۔ براہ کرم سٹیٹ بینک کی
درخواستوں اور حسابداری حکم صادر کرنے کی۔ تاکہ سٹیٹ بینک کو
حکومت کے ساتھ ساتھ ہی ہو۔

خیر علیہ ڈائری

صدر ایجنسی
4PS حکومت پنجاب
سٹیٹ بینک آف پاکستان

صفحہ 05
03/21

20

18

No. 16

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Received a registered*
addressed to DEOLA

Rs. _____
Date Stamp
3 MAY 21
2523

*Write here "letter", "postcard", "packet" or "parcel"
initials of Receiving Officer (with the word "insured" before it when necessary.)

Insured for Rs. (in figures) 100 (in words) _____

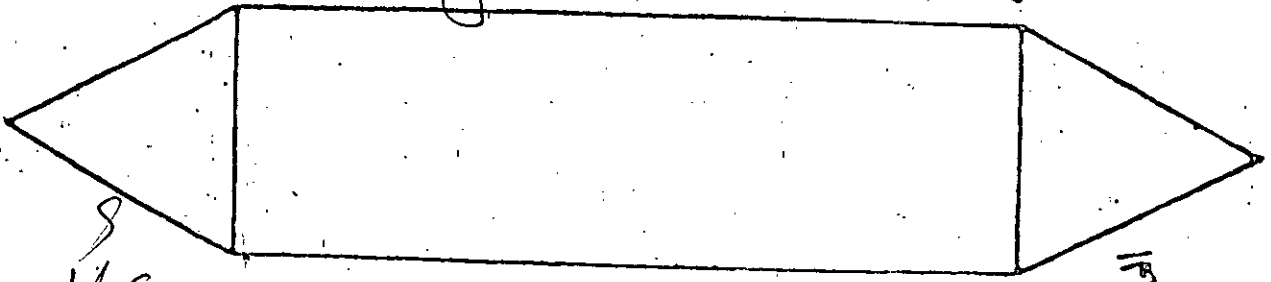
If insured

Insurance fee Rs. _____ Ps. _____ (in words) }
Weight } Kilo
Grams

Name and
address
of sender

REGISTERED

بعدالت سرسوں ٹرسٹ



منجانب سائل
بنام حکومت و سہ

صید

مقدمہ
دعویٰ
جزم

باعث تحریر انکم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی دیکھ
 کارروائی متعلقہ آن مقام سرسوں ٹرسٹ کے لئے رضی اللہ تعالیٰ عنہما کے واسطے
 مقررہ کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز
 دیکس صاحب کو کرنے راضی نامہ و تقریرات و فیصلہ برحسب دیے جواب وہی اور اقبال دعویٰ اور
 بصورت دیگر ہی کرنے اجراء اور دوسری چیک درپور اور مرضی دعویٰ اور درخواست جزم کی تصدیق
 ذرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کیفر یا اپیل کی برآمدگی اور مرضی
 نیز دائر کرنے اپیل ٹکرائی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کارروائی کے واسطے اور دیکس یا منتار قانونی کو اپنے ہمراہ یا اپنی بجائے تفریح کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جلد مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ
 پرداخت منظور قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سب سے ہوگا۔
 اس کے مستحق دیکس صاحب موصوف ہوں گے۔ نیز بقایا خرچہ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر
 کوئی تاریخ پیش مقام دورہ پر ہو یا حد سے باہر ہو تو دیکس صاحب پابند نہ ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا ذرا کات نامہ لکھ دیا کہ سند رہے۔

عزیزانہ
 [Handwritten signature]

[Handwritten signature]

مقدمہ

المترجم

دعا
 [Handwritten signature]
 Rahim ulah Chitrali
 Continental Plaza
 Makar Bazar
 Swat
 0343-9540004
 0343-2920648

مقام

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

To the matter of Appeal No. _____/2021

Haider Hussain

Versus

Govt. of KPK.

APPLICATION FOR TRANSFER THE ABOVE MENTIONED CASE
FROM PRINCIPAL SEAT 2 MINGORA BANCH SWAT.

Respectfully Sheweth:

1. That the above mentioned case is pending before your honor and fixed for today.
2. That the petitioner is belong to Chitral and the Counsel is also practicing lawyer in the Darul Qaza Swat.
3. It is difficult for the petitioner and counsel to appear in before your honor in Peshawar.
4. That on the acceptance of this application that case may kindly be transferred from Principal Seat 2 Mingora Banch Swat.

Dated. 10-12-2021

PETITIONER

Haider Hussain

Through

Rahim Ullah Chitrali &

Waqar Ahmad Baig 

Advocates High Court Peshawar.