

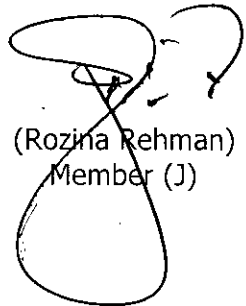
08.12.2020

Mir Zaman Safi Advocate, counsel for appellant present.

At the very outset, learned counsel sought withdrawal of the instant appeal as grievances of the appellant were stated to have been redressed by the respondent department. To this effect, statement of learned counsel was recorded on the margin of order sheet and his signature was obtained thereon.

In view of his request, instant service appeal stands dismissed as withdrawn. No order as to costs. File be consigned to the record room.

Announced.
08.12.2020


(Rozina Rehman)
Member (J)

Note: That grievances of the appellant have been redressed, hence the instant appeal.
M. Z. Safi
08/12/2020

22.04.2020

Due to COVID19, the case is adjourned to 23.07.2020 for the same as before.



Reader

23.07.2020

Appellant is absent. The legal fraternity is observing strike today therefore, no proceedings could be conducted. The case is adjourned to 06.10.2020. To come up for previous proceedings before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER

06.10.2020

Junior to counsel for the appellant present.

Learned senior counsel for the appellant is not in attendance today due to general strike on the call of Khyber Pakhtunkhwa Bar Council. The matter is adjourned to 08.12.2020 for hearing before S.B.




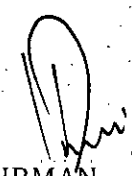

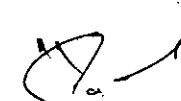
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1961/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/12/2019	<p>The appeal of Mr. Ghafoor Rehman resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 18/12/19</p>
2-	20/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/01/20</u></p> <p> CHAIRMAN</p>
P-2	23.01.2020	<p>Nemo for appellant.</p> <p>Notices be issued to appellant/counsel for preliminary hearing on 09.03.2020 before S.B.</p> <p> Chairman</p>
	09.03.2020	<p>Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up on 22.04.2020 before S.B. Appellant be put to notice for the date fixed.</p> <p> Member</p>

The appeal of Mr. Ghafoor Rehman Ex-PSHT GPS Shahid Abad Takht Bhai Mardan received today i.e. on 02.12.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Annexure-D of the appeal is illegible which may be replaced by legible/better one.

No. 2111 /S.T,

Dt. 3-12 /2019.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.

Note:

Sir,

That copy of the CNIC attached as annexure-D will be place before the court as original. Therefore the case may be put before the bench.


18/12/2019.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1961 /2019

GHAFOOR REHMAN VS EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1- 3.
2.	Service book	A	4- 9.
3.	Certificate	B	10.
4.	Pay slip	C	11.
5.	Old CNIC	D	12.
6.	Decree	E	13- 18.
7.	New CNIC	F	19.
8.	Inquiry report 10.05.2019	G	20- 24.
9.	Inquiry report 03.09.2019	H	25- 26.
10.	Departmental appeal	I	27.
11.	Appellate authority	J	28.
12.	Vakalat nama	29.

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE

Room No. 3 & 4, Upper Floor,
Islamia Club Building,
Khyber Bazar, Peshawar
0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1961 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1700

Dated 02/12/2019

Mr. Ghafoor Rehman, Ex-PSHT (BPS-15),
GPS, Shahid Abad, Takht Bhai, District Mardan.

.....**APPELLANT**

VERSUS

- 1- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer, District Mardan.
- 5- The District Accounts Officer, District Mardan.

.....**Respondents**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE APPELLATE ORDER DATED 11-11-2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT FOR RELEASE OF PENSION HAS BEEN REGRETTEED AND AGAINST THE INACTION OF THE RESPONDEDNTS BY NOT RELEASING PENSION OF HE APPELLANT.

PRAYER:

That on acceptance of this appeal the impugned order dated 11-11-2019 may very kindly be set aside and the respondents may kindly be directed to release pension of the appellant w.e.f. 17-01-2019 with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That the appellant was initially appointed as PTC in the respondent department and was posted at G.P.S Baido Kalay, Takht Bhai, Mardan on 3-10-82 and his date of birth was recorded in his service book as 18-01-1959. (Copy of the Service Book is attached as annexure.....**A.**
- 2- That appellant date of birth in the Secondary School Certificate is 18-01-1959 as evident from his Secondary School Certificate. Copy of the Secondary School Certificate is attached as annexure.....**B.**

Filed to-day
Registrar
02/12/19

Submitted to-day
and filed.
Registrar
18/12/19

- 3- That since his appointment appellant date of birth in the record of District Account Officer is also the same as mentioned in above Para and the same is evident from the pay slip of the appellant. (Copy of the pay slip is attached as annexure.....**C.**
- 4- That the date of birth of the appellant in the NADRA record was recorded incorrectly as 1951 which was challenged before the competent court. That the court rectified/corrected the same as per the service record and the necessary correction to that effect was made by NADRA in the appellant CNIC on the basis of the Court Decree. (Copies of the Old CNIC, Decree and New CNIC are attached as annexure.....**D,E&F.**
- 5- That the date of retirement of the appellant on superannuation was w-e-f 17-01-2019 so the appellant preferred an application for his pension but due to incorrect date of birth in the old CNIC and Service record his cse was preferred before an inquiry committee. The inquiry committee on 10-2019 submitted the following observation
"Thus it is declare that Ghafoor Rehman (Ex-PSHT) date of birth as per secondary school certificate is correct. So as per S.S.C. his CNIC be issued and his pension be sanctioned accordingly." Copy of the inquiry report dated 10-5-2019 is attached as annexure.....**G.**
- 6- That after the inquiry dated 10-5-2019 the pension was not released and another inquiry was conducted with regard to the appellant's date of birth recorded in the CNC and service book. The subsequent inquiry also held the same observation that as per available record his date of birth is 18-01-1959 but in the recommendation it is stated that appellant case for correction of date of birth is in appeal stage so the case of the appellant for retirement be keep pending and shall be decided in light of judgment of the civil court. Copy of the inquiry report dated 3-9-2019 is attached as annexure.....**H.**
- 7- That after getting decree from the court with respect to the correct date of birth in CNIC, the same when corrected in the CNIC, the appellant preferred departmental appeal before the Respondent No. 4/ competent authority on 08-11-2019. Copy of the departmental appeal is attached as annexure.....**I.**
- 8- That departmental appeal of the appellant was regretted/ rejected vide order dated 11-11-2019. Copy of the impugned order dated 11-11-2019 is attached as annexure.....**J.**
- 9- The appellant has no other remedy but to prefer the instant service appeal on the following grounds amongst others.

ON GROUNDS:

- A- That the impugned order dated 11-11-2019 is against law, facts, norms of natural justice and material on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the respondent department on the subject noted above as such the respondent violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondent acted in arbitrary and malafide manner while issuing the impugned order date 11-11-2019 and not releasing the pension of the appellant.
- D- That according to Supreme Court verdicts pension is not the bounty of the state rather it is the sole right of the employee who rendered services for the state and the Department concern.
- E- That not releasing pension of the appellant is the clear violation of section 19 of the Civil servant act, 1973.
- F- That not releasing pension of the appellant the respondents violated Article 38(e) of the Constitution of Pakistan, 1973.
- G- That appellant has been discriminated on the subject noted above as such the respondents violated the principle of natural justice.
- 1- The appellant seeks permission to advance other grounds and proof at the time of hearing.

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


Dated:27.11.2019

APPELLANT


GHAFOOR REHMAN

THROUGH:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN
&

MIR ZAMAN SAFI
ADVOCATES

Note: The entries in this page should be reviewed or rechecked at least every five years, and the signature in lines 9 and 10 should be dated.

1. Name .. *Chafoor Rahman* A-4

2. Race .. *Mughal*

3. Residence .. *Village Spiloro Dheri (Hathia)
Teh: & Distt. Banda*

4. Father's name and residence .. *Gyul Rahman*

5. Date of birth by Christian era as nearly as can be ascertained *Eighteenth January 1859 and
Fifty-nine (18-1-1959)*

6. Exact height by measurement *5' 6"*

7. Personal marks for identification.. *Scars on right face*

8. Left hand thumb and finger impression of (non-governed) officer

Left Finger ✓ Ring Finger ✓
Middle Finger ✓ Fore Finger ✓
Thumb ✓

Attested
Sub-Divisional Education Officer (Type Primary) **WABDAN**

9. Signature of Government servant .. *Chafoor Rahman*

10. Signature and designation of the Head of the Office, or other Authorizing Officer. *26/3/03*
Sub-Divisional Education Officer WABDAN

ATTESTED
4

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, i.e. (i) substantive appointment or (ii) whether service counts for pension under Art. 371 of S. R.	Pay in substantive post	Additional Pay for officiating	Other employment falling under the term "Other"	Date of appointment	Signature of Government servant

Grade: B15-12-99/14-525
 G.P.S. off/27
 Baide Hill. Rs. B15/Fixed
 9 ¹⁰/₈₂ Ghatoran

Conditionally in the ...
 S. No. 6 - on 1.7.83 360/-
 B.P.S. No. 7 on 1.7.83 500/-
 pay fixed to P.P.S. No. 7 - on 1.7.83 500/-
 Date of increment 1 - 11 - 83

UNDER TAKING
 I Mr. ... here ...
 to the effect ...
 to be ...
 payment ...
 verified ...
 dated ...
 Ghatoran

Attested
 S. D. E. O. / M / 8

B.P.S. No 7 ie 500-23-1020

Do	Do		B. 580/- Fixed			1 ⁷ / ₈₃ Q. P. S.
Do	Do		583/-			1 ¹² / ₈₃ Q. P. S.
Do	Do		606/-			1 ¹² / ₈₃ Q. P. S.
Do	Do		(628) 629/-			1 ¹² / ₈₅ Q. P. S.
Do	Do		652/-			1 ¹² / ₈₆ Q. P. S.

5

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer.	Period	Government to which debitible	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or prize of the Government Secret

Mardan
S.D.E.O. (M) 3/83
Mardan

30/6/83
Pay revised

Mardan
S.D.E.O.
Mardan

Office of the Accountant General
N.W.F.P. Peshawar
Pay fixed in basic pay scale 1953
of Rs. 560/- P.M. S. No. 1.7.83
@ Rs. 560/- P.M. S. No. 1.12.83
with next increment on

Asstt. Accounts Officer
Asstt. Acty. General
N.W.F.P.

Appointed against left
P.T.S. Part at G.P.S.
Banda Killa (Mardan)
in N.P.S. No. 6 G.P.S.
B.S./ Fixed vid D.E.O
(M) Mardan Emrst. No. 11/83
1018-75 dated 3-10-82

Mardan
S.D.E.O. (M) 24/83
Mardan

26-3-85
Extra ordinary (leave without pay)
leave sanctioned vide D.E.O (M)
Mardan Emrst. No. 14056 dt. 16/83
w.e.f. 7-5-83 to 17-5-83 (11 days)
on the strength of M. certificate

Mardan
S.D.E.O. (M) 7/11/83
Mardan

30/11/83
9 months

Mardan
S.D.E.O. (M)
Mardan

Mardan
S.D.E.O. MARDAN 16/8/85
Mardan

1-8-85
14 30/11
85 10-84

Service Verified w.e.f. 1-8-85 to 30-11-84
from the Acty Roll & other record
of this Office.

Mardan
S.D.E.O. (M) 30/11/84
Mardan

30/11/84
9 months

Mardan
S.D.E.O. (M)
Mardan

Mardan
S.D.E.O. (M) 12/84
Mardan

12/84 to 30/11/85

Service Verified w.e.f. 12/84 to 30/11/85
from the Acty Roll & other record
of this Office.

Mardan
S.D.E.O. (M) 30/11/85
Mardan

30/11/85
9 months

Mardan
S.D.E.O. (M)
Mardan

ATTESTED

Mardan
S.D.E.O. (M) 30/11/86
Mardan

30/11/86
9 months

Mardan
S.D.E.O. (M)
Mardan

Mardan
S.D.E.O. (M) 12/84
Mardan

12/84 to 30/11/85

Service Verified w.e.f. 12/84 to 30/11/85
from the Acty Roll & other record
of this Office.

Sub Divisional Education
Officer (Male) Primary
Tajik Bhai

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating state (i) administrative appointment, or (ii) whether service counts for pension under Art. 31, C. U. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling due for the term 'Pay'	7 Date of appointment	8 Signature of Government servant
<u>BPS No 7 @ R. 550 31 1370</u>							
G.P.S Baido Killi	sub/ff			R. 874/2	7/87		C. P. Sharma
do	do			R. 905/2	12/87		C. P. Sharma
A.P.S Zain Abad	- do			RS 905/-	12/87		C. P. Sharma
Do	Do			R. 936/-	12/1988		C. P. Sharma
G.P.S Akbarabad Hathian	Do			R. 936/-	13/88		C. P. Sharma
Do	Do			Rs. 907/-	12/89		C. P. Sharma

Office of the Accounts Officer
 N.A. No. 100
 P.O. Baido Killi
 of Rs. 2500/-
 of Rs. 24/2
 With Next Month

Pay Scale 1987
 374 (B.7)
 P.M. No. 1-7-1987
 1-12-1987

Accounts Officers
 C.P. Sharma

6

~~6~~

9	10	11	12	13	14	15
Signature and designation of the head of the office or officer in charge of the office of the Government	Date of termination of appointment	Reason of termination (such as promotion, transfer, discharge, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken Allocation of period of leave on average not more than four months for which leave salary is payable to another Government Period Government to which debit	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or removal or discharge of the Government servant
As advised A. Ullah	30/12/87	Death	As advised A. Ullah			12/86 to 30/12/87
Dilawar Khan S. D. E. Officer MARDAN	18/11/88	Transfer	Dilawar Khan S. D. E. Officer MARDAN		Service Verified with effect from the 12/11/87 to 30/11/88 of this Office	12/87 to 30/11/88
Dilawar Khan S. D. E. Officer MARDAN	13/1/88	Transfer	Dilawar Khan S. D. E. Officer MARDAN		Sub-Divisional Education Officer (Male) TAKHT BHAI	
Dilawar Khan TAKHT BHAI	30/11/89	GMC	Dilawar Khan S. D. E. Officer TAKHT BHAI		Attested	
Dilawar Khan S. D. E. Officer TAKHT BHAI			Dilawar Khan S. D. E. Officer TAKHT BHAI		Sub-Divisional Education Officer (Male) Primary Takht Bhai	

ATTESTED

[Signature]

7
450

Signature of Government Servant	Signature and designation of the officer of the office of the Government servant in connection with the appointment	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attaching officer
P. Rah	Dilawar S.D.O. (M) Takt Bhal	30/11/91	Ann. Oncl	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	31/5/91	Pay revised	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	20/11/91	Ann. Oncl	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	30/11/91	Ann. Oncl	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	11/4/93	Trans-ferred	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	31/11/93	Ann. Oncl	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	31/5/91	Pay revised	Dilawar S.D.O. (M) Takt Bhal
P. Rah	Dilawar S.D.O. (M) Takt Bhal	11/4/93	Ann. Oncl	Dilawar S.D.O. (M) Takt Bhal

Approved of S/Grade in BPS No 10 (Rs. 870-42-1710) w.e.f. from 1-7-89 with DEOCM Murdara Endst No. 3804-51 F-II/S. Grade/DTC Dated 3/3/1991

OPTION

AS a result of awarded S/Grade in BPS.No.10 to me WEP 1-7-89 I here by Opt: for refixation of my pay on 1-12-89 as per provision contained para 10(3) pay revision Rules 1978.

Sig. P. Rah

Attested.

Dilawar
Sub Divl. Edu. Officer
(M) Takt Bhal (Murdara)

1695
11/8/91

Ann of diff 7/8 etc on awarded 7 8 grade B-10 of 1/2 630/- (996-936) 91 (10) 8-967) 10 to 998)

2556/2 dr

S. Khan
Addl Dist. Officer Murdara

Service Verified
w.e.f. 1.12.92 to 31/12/93

Dilawar
S.D.O. (M)
Takt Bhal

1000 8

Signature of Head of the office of the District Education Officer

Date of approval

Reason of recommendation

Signature of Head of the office of the District Education Officer

Signature of Head of the office of the District Education Officer

Signature of the Head of the office of the District Education Officer

Signature of the Head of the office of the District Education Officer

S.D.E.O. (M)
Takht Bhai

30/11/93

Ann
Dnc
Entry
Reverse

S.D.E.O. (M)
Takht Bhai

Service Verified
of... to...

S.D.E.O. (M)
Takht Bhai

30/11/92

2 Adv.
F.A

S.D.E.O. (M)
Takht Bhai

Service Verified
of... to...

S.D.E.O. (M)
Takht Bhai

30/11/92

A/No

S.D.E.O. (M)
Takht Bhai

Service Verified
of... to...

S.D.E.O. (M)
Takht Bhai

30/11/93

A/No

S.D.E.O. (M)
Takht Bhai

S.D.E.O. (M)
Takht Bhai

28/5/94

CT.
Adv.
No.

S.D.E.O. (M)
Takht Bhai

Service Verified
of... to...

S.D.E.O. (M)
Takht Bhai

31/5/94

Pay.
Revisions

S.D.E.O. (M)
Takht Bhai

S.D.E.O. (M)
Takht Bhai

30/11/94

A/No.

S.D.E.O. (M)
Takht Bhai

Approved Two advance me as F.A. w.e.f 31-10-92 date of 06 passing FA Exam; vide 4007 of H.P.P Finance Deptt. Letter No. FO/PRE/3-1/93 Dated 18/7/93.

S.D.E.O. (M)
Takht Bhai

30/11/95

A/No

S.D.E.O. (M)
Takht Bhai

S.D.E.O. (M)
Takht Bhai

APES
Q

Sub Divl. Edu. Officer
(M) Takht Bhai (Mardan)

Approved

S. No. 187809

Roll No. 18744

Board of Intermediate & Secondary Education
Peshawar (Pakistan)



SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION 1975
ANNUAL

This is to certify that GAFOOR RAHMAN
son/daughter of GUL RAHMAN and a student
of GOVERNMENT HIGH SCHOOL MATHIAN (MARDAN)
passed the Secondary School Certificate Examination of the Board
of Intermediate and Secondary Education, Peshawar held in April, 1975
in the SECOND Division.

The candidate passed in the following subjects :—

1. English
2. Urdu
3. Islamiyat
4. SOCIAL STUDIES
5. GENERAL SCIENCE
6. GENERAL MATHEMATICS
7. ISLAMIC STUDIES.
8. PAKISTO.

Date of Birth EIGHTEENTH JANUARY One thousand
nine hundred and FIFTY-NINE (18-1-1959)

13th July, 1975.

110

ATTESTED

SECRETARY

B.I.S.E. PESHAWAR



VERIFIED AND FOUND CORRECT

Asst. Secretary
(Ops)
B.I.S.E. Peshawar

27/7/2019

Dist. Govt. NWFP-Provincial
District Accounts Office Mardan
Monthly Salary Statement (January-2019)



11
 11

Personal Information of Mr GHAFOOR RAHMAN d/w/s of GUL RAHMAN

Personnel Number: 00119480 CNIC: 1610223183855 NTN:
 Date of Birth: 18.01.1959 Entry into Govt. Service: 09.10.1982 Length of Service: 36 Years 03 Months 024 Days

Employment Category: Vocational Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 80003433-DISTRICT GOVERNMENT KHYBE
 DDO Code: MR6157-DY.DISTRICT EDUCATION OFFICER (M) TAKHT BHAI MARDAN
 Payroll Section: 003 GPF Section: 001 Cash Center:
 GPF A/C No: EDUMR003078- Interest Applied: Yes **GPF Balance:** 672,710.00
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 24

Wage type		Amount	Wage type		Amount
0001	Basic Pay	26,345.00	0001	Basic Pay	0.00
1000	House Rent Allowance	1,288.00	1210	Convey Allowance 2005	1,566.00
1300	Medical Allowance	823.00	1505	Charge Allowance	22.00
2148	15% Adhoc Relief All-2013	617.00	2199	Adhoc Relief Allow @10%	411.00
2211	Adhoc Relief All 2016 10%	2,092.00	2224	Adhoc Relief All 2017 10%	2,634.00
2247	Adhoc Relief All 2018 10%	2,634.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription - Rs2890	-2,890.00	3501	Benevolent Fund	-329.00
3990	Emp.Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-577.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	100,000.00	-5,000.00	90,000.00

Deductions - Income Tax

Payable: 0.00 Recovered till JAN-2019: 540.00 Exempted: 540.00- Recoverable: 0.00

Gross Pay (Rs.): 38,432.00 Deductions: (Rs.): -8,921.00 Net Pay: (Rs.): 29,511.00

Payee Name: GHAFOOR RAHMAN
 Account Number: PLS000000073748
 Bank Details: NATIONAL BANK OF PAKISTAN, 230620 NBP DARGA IMALAKAND AGENCY NBP DARGA IMALAKAND AGENCY,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: VILL SPALANO DHERI POHATHAIN TAKHT BHAI
 City: MARDAN Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address: City: Email: ghafoorpshtl@gmail.com

ATTESTED

حکومت پاکستان

D-12

قومی شناختی نمبر
16102-2318385-5

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TQ1F7Q نامی سربراہ 16102-2318385-5

قومی شناختی نمبر

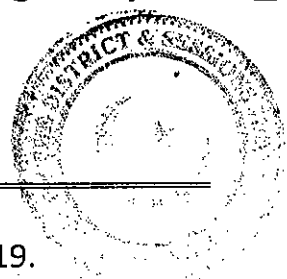
61244892

28/10/2011



E-13 10-13

IN THE COURT OF BADAR RIAZ,
Civil Judge-I, Mardan.



Suit No.....1213/ 1 Nim of 2019.

Date of original institution.....8.09.2018

Date of Institution.....11.09.2019.

Date of original institution..... 08/09/2018

Date of Remand in.....4.9.2019.

Date of decision.....25.10.2019.

= = = = =
Q. 28-10-19

Ghafoor Rehman S/O Gul Rehman R/O Spilano Dheri ,Hathiyar Mardan
Tehsil Takht Bhai & District Mardan.....(Plaintiff)

Versus.

Director NADRA Mardan.....(Defendant)

=====

SUIT FOR DECLARATION Etc.

=====

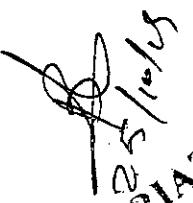
JUDGMENT.

1. (Alif) Brief facts in the backdrop are that Plaintiff by seeking special remedies under the Specific Relief Act, 1978 averred that correct date of birth of Plaintiff is 18.01.1959 however, it is wrongly entered in the record of defendant as 1951 and thus specifically prayed for its rectification accordingly.
2. Upon submission of list of witnesses, both the parties on being provided with an opportunity to adduce their desired evidence, the parties were heard and record of the case file was gone through with valuable assistance.
3. The above discussion boils down to my following issue-wise findings.
4. The correct date of birth of the Plaintiff is 18.01.1959 but the defendant incorrectly recorded the same as 1951 which is wrong, illegal and ineffective upon right of Plaintiff.

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BADAR RIAZ
Civil Judge-I Mardan

5. Bey. Plaintiff also prayed for grant of mandatory injunction giving direction to the defendant for correction of his date of birth as 18.01.1959.

6. After institution of the suit with due process of law and procedure the defendant was summoned, representative of defendant marked his attendance and contested the suit by filing written statement. In the written statement, the defendant has raised several legal and factual objections. The controversial pleadings of the parties were reduced into the following issues in the first round of litigation.

7. ISSUES.

1. Whether Plaintiff has got cause of action?OPP
2. What is the correct date of birth of Plaintiff?OPP
3. Whether suit of Plaintiff is within time?OPP
4. Whether Plaintiff is entitled to the decree as prayed for?
5. Relief.

After that both the parties were given reasonable opportunity to adduce their evidence. After conclusion of trial suit of the Plaintiff was dismissed vide judgment dated 18.01.2019. Appeal was filed against this judgment and the case was remanded back by the learned appellate court with the direction to decide the case afresh in the light of observations contained in para No.10 of the said judgment and the appeal was decided in the above terms.

suit of plaintiff was dismissed vide judgment dated 18.1.2019. This judgment was assailed before the learned appellate court and the learned appellate court vide order dated 04.09.2019 remanded back the case to this court with direction to summon and examine the Official of Education Board, which has issued Matric Certificate to the Plaintiff and the Department in which the Plaintiff is serving are required to be examine as court witnesses and to frame an additional issue to determine whether civil court has got jurisdiction or not.

In pursuance of the directions of the appellate court following additional issue was framed,

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MADAR RIAZ
Civil Judge-I Mardan
25/10/19

(15) (15)

1. Whether this court has got jurisdiction to entertain the present suit?

In pursuance of the direction of the appellate court BISE Peshawar was summoned as CW, on the other hand the perusal of the record it was revealed that the department wherein the plaintiff is serving is already examined as CW.1.

After notice the representative and legal advisor of BISE Peshawar appeared and certified that the DMC Exhibited in the record is true and genuine hence there is no need to record the evidence, the same was also admitted by the plaintiffs council.

8. After the completion of evidence, arguments of the learned counsels for the parties were heard and the councils of the parties were directed to argue on the additional issue i.e the issue of law regarding the jurisdiction of the court, record of the case file was gone through with their valuable assistance.
9. The above discussion boils down to my following issue-wise findings.

ISSUE NO.02.

Burdon of proof regarding this issue was on plaintiff.

During the course of recording evidence, Muhammad Rehman son of Ghafoor Khan attorney for the Plaintiff and Toseef Ali son of Shaukat Ali appeared as P.Ws.1 and PW.02 respectively. Both the PWs supported the stance of Plaintiff. Photo copy of the power of attorney is Ex.P.W.1/1 while the Matric certificate and service book photo copies are Ex. P.W. ½ and 1/3. Photo copy CNIC of attorney for the Plaintiff is Ex,P.W. ¼. The representative of the Board of Peshawar further supported and verified the copy of Matric certificate. Nothing contradictory could be brought on record from PWs.

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Examiner Comptroller Branch
Sessions Court

ADAR RIAZ
25/10/13
JUDGE-I Mardan

13

Muhammad Idrees (Assistant Superintendent of NADRA) appeared as DW.1 who produced the old page of RG-3 register but could not exhibit as the original register was not available. Nisar Ahmad ADEO Primary Section Mardan who also supported the stance of the Plaintiff. The photo copy of his service is exhibited as Ex.C.W.1/1.

Representative of Peshawar Board as CW appeared and verified the copy of Matric certificate already produced by the Plaintiff upon which the defendant had raised no objection and admitted it to be correct therefore, there was no need to record statement of the said CW.

The counsels of the parties argued and assisted the court of the issue of law i.e the additional issue and stated that as the plaintiff has not challenged.

Claim of Plaintiff is that his true and correct date of birth is 18.01.1959 while the defendant has incorrectly recorded the same as 1951 in their record, which is liable to be rectified therefore, the authenticity of these matric certificate is no more doubtful. This authenticity of the Matric Certificate being issued by the authorized Department is a good documents and being produced and exhibited through attorney for the Plaintiff which is further verified by the concerned representative of the BISE Peshawar.

Keeping in view the above discussion and statements of CWs, it is held that correct date of birth of the Plaintiff is 18.01.1959. Issue decided accordingly.

ISSUES NO.1 & 4.

In the light of foregoing discussion, plaintiff has proved his stance/claim through cogent and reliable evidence; therefore, he has got cause of action and is entitled to the decree, as prayed for. Both these issues are decided in favor of plaintiff.

ISSUE NO.3

Neither pressed nor proved hence left redundant.

ADDITIONAL ISSUE No.1

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Sessions Court Mardan

BADAR RIAZ
Civil Judge Mardan

W

(16) (10)

(17)

The counsel for the plaintiff argued that as the plaintiff has not challenged the service record and has prayed for the correction in the Nadra record only, hence the instant suit falls within the jurisdiction of this civil court. Keeping in view the stance of the plaintiff and stance of the defendants this court I of the view that the plaintiff has rightly filed the instant suit in this civil court and this civil court has got jurisdiction to entertain the instant suit. Issue decided in positive.

RELIEF.

Crux of my issue wise discussion that suit of the plaintiff is hereby decreed in his favour against the defendants as prayed for. No order as to costs. This decree shall not affect the rights of any other person interested, if any. Furthermore, this decree shall not exempt the plaintiff from civil or criminal liability, if any.

File be consigned to record room after its necessary completion and compilation.

Announced.

26.10.2019.

(Badar Riaz)

Civil Judge-I, Mardan

BADAR RIAZ

Civil Judge-I Mardan

CERTIFICATE.

Certified that this judgment consist of 05-pages which has been duly signed by me after its necessary correction therein.

(Badar Riaz)

Civil Judge-I, Mardan

BADAR RIAZ

Civil Judge-I Mardan

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Sessions Court Mardan

17681

Name of Applicant	
Application No	<i>17681</i>
Date of Presentation of Application	<i>28-10-19</i>
Date on which copy Prepared	<i>28-10-19</i>
Date on which copy Examined	<i>28-10-19</i>
No. of pages	<i>8-9</i>
Examiner Copying fee	
Ur. sealed	<i>K</i>
Signed of applicant	
Date of Delivery	<i>28-10-19</i>

10


IN THE COURT OF BADAR RIAZ CIVIL JUDGE-I, MARDAN.

Order.....06
25.10.2019

Parties present.. Arguments heard on the additional issue of law. Vide my detail judgment of today consisting of (05) pages, separately placed on file, suit of the plaintiff is hereby decreed in his favour and against the defendants as prayed for. No order as to costs. This decree shall not affect the rights of any other person interested, if any or his service record, if any.

File be consigned to record room after its necessary completion and compilation.

ANNOUNCED.
25.10.2019.


(Badar Riaz)
Civil Judge-I-Mardan

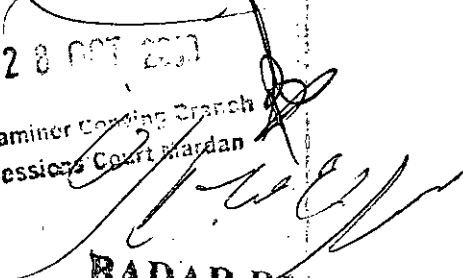
BADAR RIAZ
Civil Judge-I Mardan

[Handwritten notes in Urdu script, including 'کاپی' and 'مکمل']

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28 OCT 2019

Examiner Copying Branch
Sessions Court Mardan


BADAR RIAZ
Civil Judge-I Mardan



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Ghafoor Rahman

F-19



Father Name
Gul Bahman

محمد رحمان

گل رحمان



Gender - Country of Stay
M - Pakistan

Identity Number
16102-2318385-5

Date of Birth
18.01.1959

Date of Issue
31.10.2019

Date of Expiry
Lifetime

Holder's Signature

[Handwritten Signature]


16102-2318385-5

محمد رحمان غفور، ڈاک خانہ، رحمان ہاؤس، تحصیل
محکمہ صحت، ضلع مردان

محمد رحمان غفور، ڈاک خانہ، رحمان ہاؤس، تحصیل
محکمہ صحت، ضلع مردان

Minister of Health
Minister General of Pakistan

101371335641
129-52-744887



گمشدہ کارڈ ملنے پر قریبی لیو ایکس میں ڈال دیں

9-(20)

انٹوائری رپورٹ بسلسلہ تاریخ پیدائش اجینٹس دربارہ

مستی بنغور زبان ضلع (PSHT) گورنمنٹ پرائمری سکول

شہادہ آباد شیرگرہ مردان

انٹوائری کمیٹی

1 محمد جاوید خان

پرنسپل HSN02 بکٹ گینگ مردان

2 حامد خان

پرنسپل HSS سواڑیاں مردان

تاریخ

27-4-2019

8-5-2019

9-5-2019

مقام -1

PS شہادہ آباد

PS NO1 گھٹیاں

HSS گھٹیاں

HSN02 بکٹ گینگ مردان

DAO مردان

عنوان :- سرورس بکٹ میں درج تاریخ پیدائش میں

گٹنڈ

طریقہ کار :- سرورس بکٹ داخلہ خارجہ ریکارڈ سنسٹریٹ کارڈ

SSC پریڈیٹر جنرل آف ایجوکیشنل سرٹیفیکیٹ کی سہیلنگ

ڈیپارٹمنٹ آف ایجوکیشن میں معلومات کرنا

تعارف :- بحوالہ پیشی بڑ 71-2870 حسبہ 2019-3-21 ازالہ

DEO(M) مردان۔ پیر انٹوائری conduct کی جاتی ہے۔

(ی)

ATTESTED

[Signature]

انٹو آڈری کا ایس حذرفہ

سستی غفور رحمان کی حذرفہ 09-10-1982 کو UT/PTC پوسٹ پر

QPS - بیدارگی کی حالت بھائی میں پہلی ٹوڑی ہوئی تھی۔ اور حذرفہ

17-01-2019 کو ایس 60 سالہ حذرفہ پوری کرنے کے بعد QPS

شاہد آباد شہر ٹرہو سے ریٹائرڈ ہو چکا ہے۔ وہیں گھنٹے کا غذا

اور سہروں تک DEO (m) آفس میں داخل کرنے کے بعد بیٹہ چند گھنٹوں

تک میں درج تاریخ پیدائش میں رد ہوا ہے۔ جو مشکوک

تک ہے۔ اس سلسلہ میں مزید تحقیقات کی ضرورت پڑی ہے۔

انٹو آڈری اس ضمن میں رائی جاتی ہے کہ اصل تاریخ پیدائش کیا ہے۔

Findings and Facts

اس ضمن میں مزید تحقیقات کی ضرورت ہے اور مختلف حقائق

پر ایک رڈ چیک کرنے کے بعد جو حقائق سامنے آئے۔ وہ مندرجہ

ذیل ہیں۔

QPS No. 1 - عیسیٰ دیکھاؤ دافل فارم

نام - غفور رحمان

ولدیت - گل رحمان

عمر داخلہ - 14

تاریخ داخلہ - 25-04-1965

مدرسہ - اول ادنیٰ

تاریخ پیدائش - 18-01-1959

ایکٹارہ جنوری سن انیس سو اسی

سیپٹمبر ڈھیری عیسیٰ

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2) HSS امتحان ریٹائرڈ داخلہ خارج

نام :- عفو رحمان

رہائش :- گل رحمان

بذد دفتر :- 986

تاریخ دفتر :- 01-4-1973

تاریخ پیدائش :- 18-01-1959

امکارہ جنوری سن اٹس سرانست

3) SSC پروڈیوسر ٹیچر ٹیچر

HSS امتحان کے جاری کردہ پروڈیوسر ٹیچر ٹیچر کے مطابق تاریخ پیدائش

18-01-1959 سندھ میں آمد لفظوں دونوں میں کوئی فرق نہ ہے۔

4) SSC اور کونسل سرٹیفکیٹ

BISE پیش در سے جاری کردہ اور کونسل SSC سرٹیفکیٹ میں تاریخ پیدائش

18-01-1959 سندھ میں آمد لفظوں دونوں میں درج شدہ کوئی فرق نہ ہے۔

سین 1975ء آمد بدل ہمز 18744 درج ہے۔

5) قومی شناختی کارڈ

CNIC میں تاریخ پیدائش 1951 درج ہے۔ یہ CNIC صرف

28-10-2011 کو جاری کیا گیا ہے۔ آمد CNIC کا نمبر 5-2318385-16102

6) سرورس بک

سرورس بک میں پیدائشی نمبروں میں 18-01-1951 لکھا گیا ہے۔ بعد میں اس کے

آخر 9 بنایا گیا ہے۔ آمد الفاظ میں eighty one کے one کو گارڈ کر

nine لکھا گیا ہے۔ لیکن ان کنٹریکٹ کے ساتھ اس وقت کے SDEO کے

دستخط موجود ہیں۔ یعنی یہ کنٹریکٹ attest کیا گیا ہے۔ آمد دونوں

کے بقول اس وقت کے SDEO جن۔ ٹیچر احمد خان صاحب مرحوم

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(3)

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7 ڈسٹرکٹ اگادٹ آفیشن ریکارڈ

DAO آفیس کے کمپیوٹر سیکشن میں تاریخ پیدائش بھی
 1959-01-18 درج ہے اور یہ 2005 سے چل رہا ہے۔
 اس سے پہلے جو مینٹولیشن کا رڈ تھا اس کا نمبر
 244882-51-129 کہیں رکھا رڈ میں موجود ہے جو یہ ظاہر
 کرتا ہے کہ تاریخ پیدائش 1951 ہے۔ اور بقول ایچ آر
 کمپیوٹر سیکشن یہ 2005 میں موجودہ سسٹم کو Convert
 ہوا ہے۔

Conclusion

1. P.S.No. 1 ایف آئی کے دافع خانہ ریکارڈ
 SSC پرویز علی لد اور کینٹل سرٹیفکیٹ میں تاریخ پیدائش
 1959-01-18 درج ہے۔ اگادٹ آفیشن کے کمپیوٹر سیکشن میں
 بھی 1959-01-18 تاریخ پیدائش موجود ہے۔ جبکہ 2011-10-28
 کو جاری ہونے والے CNIC میں تاریخ پیدائش 1951 درج
 ہے۔ دونوں میں کافی فرق ہے۔ لیکن ڈسٹرکٹ اگادٹ آفیسر
 مردان کے بقول پینشن پر جانے والے سہ کاروں میں ان کی عمر کا
 تعین اس کی SSC سرٹیفکیٹ میں درج تاریخ پیدائش
 کی بنیاد پر کیا جاتا ہے۔ اس کے ساتھ ساتھ کارڈ کی بنیاد پر SSC کا
 سرٹیفکیٹ بنیادی اہمیت کا حامل ہے۔ اور SSC سرٹیفکیٹ میں
 درج تاریخ پیدائش درست تسلیم کی جاتی ہے۔ لہذا اس قدر دریا
 جاتا ہے کہ سستی پور رحمان سالہ PSHAT کا SSC سرٹیفکیٹ میں
 درج تاریخ پیدائش درست تسلیم کیا جائے۔ اور اس کے مطابق CNIC
 بنوایا جائے۔ اور پینشن کی منظوری دی جائے۔

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سفارشات

کسی بھی سرکاری جلدوزم کی عمر اور صلاحیت سے اس ٹریننگ کا
 فیصلہ اس کی جیڈٹ سرٹیفکیٹ میں درج تاریخ پیمائش کی
 بنیاد پر کیا جاتا ہے۔ جیڈٹ کا مندرجہ ذیل اسٹیٹ کا حامل ہے۔
 اس سلسلہ میں سفارش کی جاتی ہے کہ DEO (M) اس ضمن میں
 منظور جانے والے PSHT گورنمنٹ پرائمری سکول میں حیدرآباد
 کی جیڈٹ سرٹیفکیٹ کی BISE پیشہ ور سے باقی عدہ لغتوں
 کی Verification کرائے تاکہ کوئی شک نہ رہے۔ اور اگر درست ثابت ہوا
 تو پیش کی منظوری دیکر پیش Release کی جائے۔

10/5/2019

(in)

حاند خان
 پرنسپل
 GHSS کورواپان

محمد صمد خان
 پرنسپل
 GHSS No. 2

PRINCIPAL
 GHSS Sowaryan
 Mardan

PRINCIPAL
 G. H. S. No. 2, BIG
 Mardan (Eng: Medi)

دفتر پرنسپل GHSS No. 2 بلیک سٹیج مردان

خدمت جناب DEO (M) مردان

انٹوڈکٹری رپورٹ مندرجہ ذیل کے لیے ارسال خدمت ہے۔

Enclos

1. نوٹوں کی اپنی داخلہ خارجہ GHSS No. 1
2. نوٹوں کی اپنی داخلہ خارجہ GHSS
3. SSC پروویژنل سرٹیفکیٹ
4. SSC گورنمنٹ سرٹیفکیٹ
5. سرورسنگ ٹیک کا صفحہ 3
6. مسٹر منظور جان PSHT کا بیان
7. قومی سفارش کا رٹ

110
 تاریخ 10-5-2019

10/5/2019

پرنسپل
 بلیک سٹیج مردان
 GHSS No. 2

PRINCIPAL
 G. H. S. No. 2, BIG
 Mardan (Eng: Medi)

(5)

ATTESTED

H-25

Inquiry report in r/o Ghafoor Rahman Ex-PSHT GPS Shahid Abad Takht Bhai Mardan

No : 1137

Dated : 03/09/2019

Inquiry Committee:-

Mr. Hamid Khan Principal GHSS Sowaryan Mardan Chairman
Mr. Arshid Hussain Principal GHS Katlang Babuzai Member

Dates of inquiry:-

26-08-2019
27-08-2019
30-08-2019
31-08-2019

Venue :-

GPS No.1 Hathain
GHSS Hathain
DEO Male Mardan
GHSS Sowaryan Mardan

Subject :- Cutting in Date Of Birth in service book

Introduction

According to the DEO (M) Mardan office order vide Endst: No: 9227-28/P.F/ Dated: 21-08-2019, the above mentioned committee was constituted to conduct denva inquiry in the cutting made in Date of Birth in service book of Mr. Ghafoor Rahman PSHT GPS Shahid abad Takht Bhai Mardan.

Brief History:-

During the retirement process of Mr. Ghafoor Rahman PSHT, it was found that cutting has been made in the Date Of Birth in the service book of the said teacher, changing it from 1951 to 1959. His case for change in Date Of Birth has been rejected by the court. So the case was referred for inquiry.

Procedure Adopted:-

The inquiry committee met in the office of the DEO (Male) Mardan office on 26-08-2019 and checked the service book and other documents of the said teacher. The committee visited GPS Shahid abad Thki t bhai, GPS No.1 Hathain, GHSS Hathain and DAO office Mardan. All concerned record was checked.

ATTESTED

Investigation:-

From checking the service book and other concerned available record at DEO (M) Mardan, GPS Shahid abad, GPS No. 1 Hathain, GHSS Hathain and DAO Mardan, the following points were observed.

Findings:-

1. Date of Birth of the said teacher in AWRs of GPS NO.1 Hathain, GHSS Hathain, SSC Original certificate, DAO record, computerized pay slip and service book is 18-01-1959.
2. Original SSC (Matric) certificate has been verified from BISE Peshawar. According to which his DOB is 18-01-1959.
3. If we consider his BOB as 18-01-1951, Then :
 - (a). at the time of admission in Awal Adna at GPS No. 1 Hathain , his age would be 14 years.
 - (b) at the time of appearing in 10th class exam from GHSS Hathain, his age would be

(c). at the time of passing SSC as regular student of GHSS Hathain, his age would be 24 years, 05 months and 25 days.

(d). at the time of appointment as PTC, his age would be 31 years, 08 months and 15 days, which is overage.

(e). No proof of 18-01-1951 is found rather it is only 1951 in CNIC, which should be recorded as 01-07-1951.

So it all seems unnatural.

4. If we consider his BOB as 18-01-1959, Then :

(a). at the time of admission in Awal Adna at GPS No. 1 Hathain, his age would be 06 years.

(b). at the time of appearing in 10th class exam from GHSS Hathain, his age would be 16 years.

(c). at the time of passing SSC as regular student of GHSS Hathain, his age would be 16 years, 05 months and 25 days.

(d). at the time of appointment as PTC, his age would be 23 years, 08 months and 15 days, which is not overage.

So it all seems natural.

5. Cutting in DOB in the service book has been attested by the SDEO concerned. However it is without date, stamp and remarks (reason for cutting/correction).

6. His DOB in CNIC was 1951 and is still 1951 and his case against NADRA for correction of DOB has been rejected by the civil Judge I Mardan. However he has filed an appeal in the court of District Judge Mardan, against this judgment.

7. He was issued MNIC in 1976. With considering 18-01-1959 as his DOB, he would be under 18 years of age and not eligible for MNIC. During changing of MNIC to CNIC and renewals process many times, he never objected/corrected his DOB.

Conclusion:-

Though as per all documents his correct DOB is 18-01-1959 but he had made forgery in his MNIC and he was appointed on the bases of that MNIC. His case is in court.

Recommendations:-

His case for correction of DOB against NADRA is in the appeal stage. So the case for retirement may be "keep pending" and be decided in the light of the judgment of the District Court.

ATTESTED



محرم صبا۔ ڈسٹرکٹ ایجوکیشن آفیسر مردان

(27) - I

درخواست برائے ریٹرن کریں پینشن فنڈ

صبا عالی! سائل حسب ذیل ہے

1۔ یہ کہ سائل نے الگ الگ سکول کا اسٹار تھا۔ جلد مورخہ 17/2519 میں ریٹرن ہو چکا ہے۔ (نقل شافعی کا عرف ہے)

2۔ یہ کہ سائل نے شافعی کا نام میں مارچ 1951ء میں غلام طور پر تاریخ پستی 1951ء ددج و تحریر کیا تھا۔ جلد مدرسہ سرٹیفکیٹ دسر دس ریٹرن میں سائل کا تاریخ پستی درست طور پر 18/1959ء ددج و تحریر ہے۔

3۔ یہ کہ لوح بالا مارچ کی غلطی کی وجہ سے سائل کا پینشن فنڈ ریٹرن نہیں کیا گیا۔ اور سائل کو کہا گیا کہ عدالت صہور سے رجوع کریں۔

4۔ یہ کہ مقدمہ عنوان غفور الرحمن بنا کر مارچ دائر کیا گیا اور اس طرح نامزدہ ڈسٹرکٹ ایجوکیشن آفس عدالت صہور میں حاضر ہو کر اپنا بیان علمند کروایا اور عدالت صہور نے درست طور پر سائل کے حق میں ڈگری صادر فرمایا گیا۔ (نقل مقدمہ عدالت صہور درخواست برائے)

5۔ یہ کہ سائل نے چند روز پہلے ڈسٹرکٹ ایجوکیشن آفیسر کے خدمت میں اپنی درخواست گزارہ لکھی سائل کو پینشن ریٹرن نہیں کرایا۔

لہذا استدعا ہے کہ سائل کو پینشن فنڈ ریٹرن کریں تاکہ صبا صہور کے طور پر حکم صادر فرمایا جائے

ATTESTED

کریم 19/11/81

غفور الرحمن سائل

J-28

OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MARDAN

No. 13415 / Dated 11-11-2019

TO

Mr. Ghafoor Rahman PSHT
GPS Shahid Abad Shergarh

Subject: RETIREMENT/CORRECTION IN DATE OF BIRTH CASE

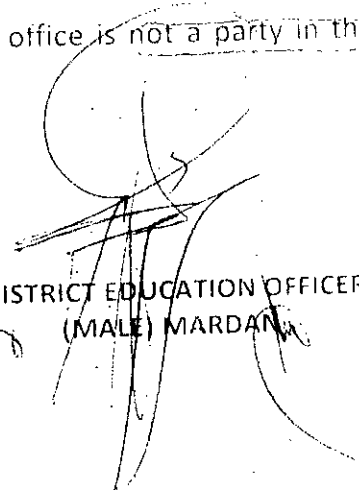
Memo:

Reference to the subject cited above. As this office is not a party in the cited case hence can not be honored.

ATTESTED



DISTRICT EDUCATION OFFICER
(MALE) MARDAN



VAKALATNAMA

Before the KP Service Tribunal, Peshawar

OF 2019

Ghafoor Rehman

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt:

(RESPONDENT)
(DEFENDANT)

I/We Ghafoor Rehman

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

Dated. ____/____/2019

10/2/19
CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH YOUSAFZAI

Kamran Khan
KAMRAN KHAN

&

Mir Zaman Safi
MIR ZAMAN SAFI
ADVOCATES

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