FORM OF ORDER SHEET

Form-A

Court of

Case No.-\_

Date of order proceedings

26/11/2020

2.

S.No.

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 15157 /2020
Order or other proceedings with signature of judge
3
The appeal presented today by Mr. Arshad Khan Advocate may be entered in the Institution Register and put to the Learned Member for
proper order please.
REGISTRAR )

This case is entrusted to S. Bench for preliminary hearing to be put

up there on 0403/4

MEMBER(J)

02.03.2021

Due to general strike on the call of Khyber Pakhtunkhwa Bar Counsel, learned counsel for appellant is not available today, therefore, the appeal is adjourned to 27.07.2021 on which date file to come up for preliminary arguments before S.B. [,

> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)

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

Service Appeal No.\_\_

Abdul Aziz PSHT( BPS-15), Beesak Gadoon Swabi.

.....Appellant

## <u>Verses</u>

The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa Peshawar & Others......Respondents

INDEX

S.NO	DESCRIPTIONS	ANNEXUR E	PAGES
1-	Memo of Appeal and Affidavit		1-3
2-	Copy of Notification dated 20-12- 2012	A	4-5
3-	Copy of Salary Slips of working /Serving month and Vacation (Deduction period)	B & C	6-7
4-	Copy of Judgement dated 11-11- 2019	D	8-9
5-	Copy of Departmental Appeal	E	10
6-	WakalatNama	F	11

Dated: /11/2020

pellant

THROUGH

Arshad Khan Advocate

Note : Other Spare Copies will be provided after regular hearing.

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.  $l^{J}$ /2020 Abdul Aziz PSHT( BPS-15), Beesak Gadoon Swabi.

Khyber Pakhtukhwa Service Tribunal Diary No 15

.....Appellant

## <u>Verses</u>

1-The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa Peshawar.

2-The secretary (E&SE), Department Khyber Pakhtunkhwa Peshawar.

3-The secretary Finance Department Khyber Pakhtunkhwa Peshawar.

4-The Accountant General, Khyber PakhtunkhwaPeshawar.

5- The Director (E&SE), Department Khyber Pakhtunkhwa Peshawar.

.....Respondents

APPEAL UNDER SECTION -4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGAL AND UNLAWFUL DEDUCTING THE CONVEYANCE ALLOWANCE OF THE APPELLANT DURING WINTER & SUMMER VACATION AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

#### <u>PRAYER.</u>

الاستيلية

That on acceptance of this appeal the respondents may kindly be ilocito-dadirected not to make deduction of conveyance allowance during the winter & summer vacations and make the payment of all outstanding amount of iconveyance allowance which have been dedicated previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

#### **RESPECTFULLY SHEWETH:** <u>ON FACTS:</u>

1. That the appellant is serving in the Elementary and Secondary Education Department as PSHT (BPS-15) quite efficiency and up to the entire satisfaction of the superiors.

2. That the Conveyance Allowance is admissible to all the Civil Servants and to this effect a Notification NO. FD (PRC) 1-1/2011 dated 20/12/2012 whereby the Conveyance Allowance for employees working in BPs 1 to 15 were enhance / revised while employees from BPS-16 to 19 have been treated under the previous Notification by not

- enhancing their conveyance allowance. Copy of Notification dated 20/12/2012 are attached as annexure **.....A**.
  - 3. That appellant was receiving the Conveyance allowance as admissible under the law and rules but the respondents without any valid and justifiable reason stopped /deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. Copy of the Salary Slips of working /Serving month

- That the similar nature cases with regard to conveyance allowance have been accepted by this Honourable Service Tribunal vide S.A No. 1452/2019 dated 11/11/2019 and many other cases. Copy of the judgment dated 11/11/2019 is attached as annexure......D.
- 5. That the appellant filed departmental appeal against the illegal action of deduction of Conveyance allowance, but the same has not been responded by the respondents within statutory period of ninety days......**E**.
- 6. That appellant feeling aggrieved from the action of the respondents regarding deduction of Conveyance allowance in Vacation period/months filled Department appeal but no reply has been received so far. That feeling aggrieved and having no other remedy file the instant service appeal on the following grounds:-

#### **GROUNDS:**-

- A. That an action of the respondents regarding deduction of the conveyance allowance for vacations period / months is illegal against the law, facts and norms of natural justice.
- B. That the appellant have not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C. That the action of the respondent is without any legal authority discriminatory and clear violation of fundamental rights duly conferred by the Constitution and is liable to declared is null and void.
- D. That there is cleared difference between leave and vacation as leave is applied by the civil servant in the light Government servant revised leave rules 1989 while the vacation are always announced by the Government, therefore under the law and rules the appellant fully entitled for the grant of conveyance during vacation period.
- E. That the Government Servant revised leave rules 1989clearly explained that the civil servant who avail the vacation are allowed only one leave in a month where is the other civil servant may avail 4 days leave in colander months and the same are credit to his account in this way he may avail 48 days earned leave with fully pay, where is government servants to avail vacations such is appellant is allowed one day leave in a month and 12 days in a year and earned leave for 12 days in a year for credit to his account and there is no question of dedication of conveyance allowance lost sight this legal aspect and illegally without any authority started the recovery and deduction of conveyance allowance from the appellant.
- F. That is the act of the respondent is illegal, unconstitutional, without any legal authority and not only discriminatory but the result of Malafiede on the part of respondents.

- G. That appellant has vested right of equal treatment before law and the act of the respondents to deprived the appellant on the conveyance allowance is unconstitutional and clear violation of fundamental right.
- H. That according to government servant revised leave rules 1989 vacations or holly days and are leave of any kind, therefore the deduction of conveyance allowance and vacation is against the law and rules.
- I. That according Article 38 (e) of the Constitution of Islamic Republic of Pakistan 1973 the state is bound to reduce disparity in the income and earning of individual including person in the service of federation therefore in the light the said Article the appellant is fully entitled for the grant of fully conveyance allowance during vacations.
- J. Those similar natures cases with regard to conveyance allowance have been accepted by this Honourable Service Tribunal vide S.A No. 1452/2019 and many other cases.
- K. That the appellant seeks permission of this Honourable to raise any other grounds at the time arguments.

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

Hant

Through

Dated 22/11/2020

Arshad Khan

&

Shahzad Shahid

Advocates Peshawar. 0345 6030980

## <u>Affidavit</u>

#### I Abdul Aziz PSHT( BPS-15), Beesak Gadoon Swabi.

GPS

hereby solemnly affirm and declared that contents of this appeal is correct to the best of my knowledge and nothing has been concealed from this Honourable and has not been filed earlier similar nature case before this Honourable Tribunal.

MUHAMA OAT

Deponent

#### FINANCE DEPARTMENT (REGUALTION WING)

#### NO.FD/SO(SR-II)/52/2012 Dated Peshawar the: 20.12.2012

#### From

To:

The Secretary to Govt: of Khyber Pakhtunkhwa. Finance Department, Peshawar.

1. All administrative Secretaries to Govt: of Khyber Pakhtunkhwa.

2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa

3. The Secretary to Governor, Khyber Pakhtunkhwa.

The Secretary to Chief Minister, Khyber Pakhunkhwa. 4.

The Secretary, Provincial Assembly, Khyber Pakhtunkhwa. 5.

6. All Heads of attached Departments in Khyber Pakhtunkhwa

7. All District Coordination Officers of Khyber Pakhtunkhwa.

S. All Political Agents/District & Session Judge in Khyber Pakhtunkhwa.

9. The Registrar Peshawar High Court, Peshawar.

10. The Chairman Public Service Commission, Khyber Pakhtunkhwa

11. The Chairman, Service Tribunal, Khyber Pakhunkhwa.

#### REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE Subject CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA. GOVERNMENT BPS-1-19

Dear Sir.

The Government of Khyber Pakhunkhwa has been pleased to enhance/revise the rate of Conveyance Allowance admissible to all the Provincial Civil Servants Govt: of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) w.e.f from 1st September, 2012 at the following rates. However, the conveyance allowance for employees in BPS-16 to BPS-19 will remain unchanged.

S.No.	BPS		Existing Rate (PM)	Revised Rate (PM).
1.	1-4		Rs. 1.500/-	Rs. 1,700/-
2.	5-10	<u> </u>	Rs. 1,500/-	Rs_1,840/-
3.	11-15		Rs. 2.000/-	Rs. 2,720/-
4.	16-19	•••	Rs. 5,000/-	Rs. 5,000/-

Conveyance Allowance at the above rates per month shall be admissible to those BPS-17, 18 and 19 officers who have not been sanctioned official vehicle.

'our Faithfully

(Sahibzada Saeed Ahmad) Secretary Finance

Endst No. FD/SO(SR-II)8-52/2012 Dated Peshawar the 20th December, 2012

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(REGULATION WING)
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Personane Number: 021352 CNIC: 13089517184 NTN: 0 Length of Service: 26 Years 07 Months £19 Day Benployment Category: Active Fernament Designation: PRIMARY SCHOOL HEAD TEACH 80004531-DISTRICT GOVERNMENT K1YUE Designation: PRIMARY SCHOOL HEAD TEACH 80004531-DISTRICT GOVERNMENT K1YUE Phyrull Section: 003 GPF Section: 001 Cosh Center: 30 GPF AC No: Interest Applied: Yes GPF Balance: 124,758.00 Vendor Number: Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Spage: 15 001 Basic Pay 0 50,000 11000 House Rent Allowance 2,349,00 2324 JAdhoe Relef Allowance 1,500,00 2144 [55: Adhoe Relief All 2016 1075 2,742,00 2324 JAdhoe Relef Allowance 1,500,00 2147 JAhoe Relief All 2018 1075 2,742,00 2324 JAdhoe Relef All 2017 1076 3,607.00 247 JAhoe Relief All 2018 1075 2,742,00 2324 JAdhoe Relef All 2019 1076 3,607.00 247 JAhoe Relief All 2018 1075 2,742,00 2324 JAdhoe Relef All 2019 1076 3,607.00 247 JAhoe Relief All 2018 1075 2,742,00 2324 JAdhoe Relef All 2019 1076 3,607.00 247 JAhoe Relief All 2018 1075 3,00.00 0,00 Peductions - General 015 [GPF Subare Relef All 2019 1076 3,607.00 247 JAhoe Relief All 2018 1075 3,000 0,00 Peductions - General 01609 [Income Tax	Monthly Salary	Statement (Aug	ust-2019)			
Personand Number: 023352 CNIC: 13695917184 NTN: 0 Length of Service: 26 Years 07 Months £19 Day Employment Category: Active Fernmanent Designation: PRIMARY SCHOOL HEAD TEACH 80004531-DISTRICT GOVERNMENT K HYDE Poyroll Section: 003 GPF Section: 001 Cosh Center: 30 GPF Actor No: Interest Applied: Yes GFF Balance: 124,758,000 Verder Number: Pay sole: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Spage: 15 000 East: Decy 50 1000 East: Decy 50 1000 East: Pay 200 1000 East:		•		•		
Date of Blinh: 18.12.1970       Entry into Govi. Service: :14.01.1993       Length of Service: 26 Yean 07 Months £10 Day         Employment Category: Active Fermanent       50004531-DISTRICT OD VERNMENT NIYDE         Dor Code: USCA: Government Initianty Schools (Male) Topi, Swabi       50004531-DISTRICT OD VERNMENT NIYDE         Dor Code: USCA: Government Initianty Schools (Male) Topi, Swabi       124,758.00         Payroll Section: 003       GPF Section: 001       Cash Center: 30         GPF AC No:       Interest Applied: Yes       GPF Balance:       124,758.00         Vendor Number:       Pay and Allowance       13400.00       1000       House Rend, Mewmane       2,349.00         1300       Moderal Allowance       1,300.00       2144       19% Adhoe Relief All2016 (19%       2,167.00         1222       Johne Relief Allow Gi(10%       533.00       2214       Adhoe Relief All2016 (19%       2,607.00         2224       Adhoe Relief Allow Gi(10%       3607.00       1301       Benevolen Hawane       400.00         2224       Adhoe Relief Allow Gi(10%       3,607.00       1301       Benevolen Hawane       400.00         2224       Adhoe Relief Allow Gi(10%       3,607.00       1,052.00       0.00       0.00         Vectoring Tax       Yean Allowanees       1,052.00       Yean Allowanee <t< td=""><td>Personal Information of Mr ABDUL AZIZ d. Personnel Number: 00235525</td><td>/w/s of ALLAH</td><td>DIN ,</td><td>· · ·</td><td>•</td><td></td></t<>	Personal Information of Mr ABDUL AZIZ d. Personnel Number: 00235525	/w/s of ALLAH	DIN ,	· · ·	•	
Employment Category: Active Permanent Designation: PRIMARY SCHOOL HEAD TEACH Designation: PRIMARY SCHOOL HEAD TEACH DOG Code: SUG26 Government Primary Schools (Male) Top; Swabi Pyry01 Section: 003 GPF ACN 0: Interest Applied: Yes GFF Balance: 124.758.00 Vendor Number: Pay scale: BPS For - 2017 Pay Scale: Top: Civil BPS: 15 Pay Stage: 15 Vage type Amount Vage Vage Amount Vage type Amount Vage Vage Vage Vage A			_			
Designation: PRIMARY SCHOOL HEAD TEACH 50004531-DISTRICT GOVERNMENT KHVUH Phyroll Section: 003 GPP Section: 001 Cash Center: 30 GPF AIC No: Interest Applied: Yes GPF Balance: 124.758.00 Vendor Number: - Phy and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 15 Wage type Amount Vage type Amount Vage type Amount 2,349.00 1300. Medical Allowance 1,500.00 1000 House Rent Allowance 2,249.00 2192 Adhoc Relief All 2017 10% 3,607.00 1247 Adhoc Relief All 2016 10% 2,742.00 2244 Adhoc Relief All 2017 10% 3,607.00 2447 Adhoc Relief All 2018 10% 3,607.00 0.00 2244 Adhoc Relief All 2019 10% 3,607.00 2447 Adhoc Relief All 2018 10% 3,607.00 0.00 2244 Adhoc Relief All 2019 10% 3,607.00 1247 Adhoc Relief All 2018 10% 3,607.00 0.00 2340 Adhoc Relief All 2019 10% 3,607.00 0.00 2341 Adhoc Relief All 2019 10% 3,607.00 0.00 2340 Cash Celler All 2019 10% 3,607.00 0.00 2340 Adhoc Relief All 2019 10% 0.00 2340 Cash Celler All 2019 10% 0.00 2340 Adhoc Relief All 2019 10% 0.00 2350 GPF Laans and Advances 1000 Rescription 0.00 Periodicions - Loans and Advances 1443.70 170 Stars Phyride 2,888.35 Recovered till Augus-2019 290.00 Exempled: 1154.65 Recoverable: 1.443.70 1362 Marker Relief All 2017 Adhoc PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI' Eavres: Opening Balance: Availed: Earned: Balance 1372 Balance 1	•			engui of Service:	20. Y cars 07	Months 019 Day
DDO Code: SU6236-Government Primary Schools (Male) Topi, Swabi Pryvoll Section: 001 GPF Section: 001 Cash Center: 30 GPF A/C No: Interest Applied: Yes GFF Bulance: 124,758.00 Pry and Allwwances: Pay scale: BPS For - 2017 Pay Scale: Type: Civil BPS: 15 Pay Stage: 15 Wage type Annount Undot R tienefits & Death Comp: 102:500 0.00 103:500.00 10	Designation: PRIMARY SCHOOL HEAD TEA	асн. 		· . · ·		
Winder         OPF Section: 001         Cash Center: 10           OPF AC: No:         Interest Applied: Yes         GPF Balance:         124.758.00           Vendor Number:         Pay scale: BPS For - 2017         Pay Scale Type: Civil BPS: 15         Pay Slage: 15           0001         Basic Pay         Amount         Wage type:         Amount         9ay Scale: Type: Civil BPS: 15         Pay Slage: 15           0001         Basic Pay         36,070.00         1000         House Reinf Allowance         2,349.00           1300         Modecal Allowance         1,500.00         2148         15% Adue Reinf Allow 2010%         2,349.00           2224         Adhoc Reinf Allow 2010%         535.00         2211         Adhoc Reinf All 2016 10%         2,472.00           2224         Adhoc Reinf All 2017 10%         3,607.00         2477         Adhoc Reinf All 2018 10%         3,607.00           215         OPF Subscription         -2,890.00         3501         Benevolent Fund         600.00           1300         Income Tax         -4145.00         3900         Emp Edu, Fund KPK         125.00           1004         R. Benefits & Death Comp:         -1.052.00         0.00         4,500.00         103.300.00           10044         R. Benefits & Death Comp:	DDO Code: SU6236-Government Primary Scho	ools (Male) Topi.	Swabi	CT GOVERNME	NTKHYBE	
Vendor Number: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 15           Prey and Allowances:         Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 15           Wage type         Amount         Wage type:         Amount           1300         Modical Allowance         2,349.00         1000           1292         Adhae Reif Allow @10%         535.00         2211         Adhoe Reif All 2015 10%         2,742.00           2224         Adhae Reif Allow @10%         535.00         2211         Adhoe Reif All 2015 10%         2,742.00           2224         Adhae Reif All 2015 10%         3,607.00         2471         Adhee Reif All 2015 10%         2,742.00           2224         Adhae Reif All 2019 10%         3,607.00         2471         Adhee Reif All 2018 10%         2,074.00           2244         Adhae Reif All 2019 10%         3,607.00         2471         Adhee Reif All 2018 10%         2,000           2244         Adhae Reif All 2019 10%         3,607.00         2471         Adhee Reif All 2018 10%         2,000           2245         Adhae Reif All 2019 10%         3,607.00         2474         24,000         240.00           2015         GPF Subscription         2,380.00         3501         Benevolent Fund         400.00           1004	GPF Section: 003 GPF Section:	001		•		
Pay and Allowances:         Pay scale: BPS For - 2017         Pay Scale Type: Civil         BPS: 15         Pay Stage: 15           Wage type         Amount         Wage type         Amount         Wage type         Amount           1001         Basic Pay         36,07:000         1000         House Reni Allowance         2,349:00           2199         Adhoc Retief Allowance         1,500:00         2148         15% Adhoc Retief All 2013         797:00           2224         Adhoc Retief All 2017         10%         3,607:00         2241         Adhoc Retief All 2016         797:00           2224         Adhoc Retief All 2017         10%         3,607:00         2247         Adhoc Retief All 2018         3067:00           2224         Adhoc Retief All 2019         10%         3,607:00         2141         Adhoc Retief All 2018         3067:00           2224         Adhoc Retief All 2019         10%         3,607:00         301         Benevolent Allowance         4000.00           1015         GPF Subscription         2,280:00         301         Benevolent Fue         425:00           3050         GPF Loans and Advances         -145:00         3990         Emp. Edu, Fund KPK         -125:00           vecturions - Loans and Advances         2888.35	interest Appli	ied: Yes	GPF Bala	nce:	124,758.00	1
Wage type         Amount         Wage type         Amount           0001         Basic Pay         36,07.000         1000         House Reni Allowance         2,149,00           2199         Adhoc Relief Allowance         1,500.00         2148         15% Adhoc Relief All 2013         797.00           2294         Adhoc Relief All 2017 10%         3,607.00         2244         Adhoc Relief All 2016 10%         2,742.00           2224         Adhoc Relief All 2017 10%         3,607.00         2447         Adhoc Relief All 2018 10%         2,742.00           2224         Adhoc Relief All 2017 10%         3,607.00         2447         Adhoc Relief All 2018 10%         3,007.00           2224         Adhoc Relief All 2019 10%         3,607.00         2447         Adhoc Relief All 2018 10%         3,007.00           2224         Adhoc Relief All 2019 10%         3,607.00         3,01         Beneviset         3,007.00         0,00           Valuetions - General		PS For - 2017	Pay Scale Type: C	ivil RPS 15		
U001         Basic Pay         36,070.00         1000         House: Rent Allowance         Amount           1300         Medical Allowance         1,500.00         2148         15% Adhoc Relief All.2013         797.00           2224         Adhoc Relief All 2017 10%         335.00         2211         Adhoc Relief All 2017 10%         2,442.00           2224         Adhoc Relief All 2017 10%         3,607.00         2211         Adhoc Relief All 2018 10%         2,472.00           2264         Adhoc Relief All 2017 10%         3,607.00         2414         Adhoc Relief All 2018 10%         2,467.00           2264         Adhoc Relief All 2019 10%         3,607.00         241         Adhoc Relief All 2018 10%         2,467.00           2015         GPF Subscription         -2,890.00         3501         Benevolent Fund         -660.00           1002         Income Tax         -145.00         3990         Emp.Edu, Fund KPK         -125.00           1004         R. Benefits & Death Comp:         -1,052.00         -0.00         103.500.00         103.500.00           resturetons - Income Tax         -145.00         -4,500.00         103.500.00         103.500.00         103.500.00           resturetons - Income Tax         -9,312.00         Net Pay: (Rs.):         45,5	· · · · · · · · · · · · · · · · · · ·		1. 1.		i ray S	lage: 15
1300         Medical Allowance         1,509,00         2148         13% Adhoc Relief All-2013         737.00           2224         Adhoc Relief Allow @10%         535.00         2211         Adhoc Relief All 2016 10%         2.742.00           2224         Adhoc Relief All 2017 10%         3.607.00         2247         Adhoc Relief All 2018 10%         2.742.00           2244         Adhoc Relief All 2019 10%         3.607.00         2247         Adhoc Relief All 2018 10%         2.742.00           2264         Adhoc Relief All 2019 10%         3.607.00         2247         Adhoc Relief All 2018 10%         2.742.00           2264         Adhoc Relief All 2019 10%         3.607.00         2247         Adhoc Relief All 2018 10%         3.007.00           2264         Adhoc Relief All 2019 10%         3.607.00         2418         Benevolent Fund         600.00           9015         GPF Subscription         -2,890.00         1501         Benevolent Fund         600.00         103.500.00           reductions - Loans and Advances         -145.00         3990         Emp.Edu. Fund KPK         -123.00         103.500.00           colan         Description         -1,552.00         Exempted: 1154.65         Recoverable:         1.443.70           ross Pay (Rs.):         54,814.0						
222       Aduce Relief All 2019       2742.00       2742.00         2224       Aduce Relief All 2019 10%       3.607.00       2247       Adhoc Relief All 2019 10%       3.607.00         2264       Adhoc Relief All 2019 10%       3.607.00       2247       Adhoc Relief All 2019 10%       3.607.00         2264       Adhoc Relief All 2019 10%       3.607.00       2247       Adhoc Relief All 2018 10%       3.607.00         2264       Adhoc Relief All 2019 10%       3.607.00       2247       Adhoc Relief All 2018 10%       0.00         Deductions - General       015       GPF Subscription       -2.890.00       3501       Benevolent Fund       600.00         16609       Income Tax       -145.00       3990       Emp.Edu. Fund KPK       -125.00         16041 R. Benefits & Death Comp:       -1.052.00       Emp.Edu. Fund KPK       -125.00         veductions - Leans and Advances       10.300.00       103.500.00       103.500.00         ceductions - Income Tax       ayable:       2.883.55       Recovered till August-2019:       290.00       Exempted: 1154.65       Recoverable:       1.443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9.312.00       Net Pay: (Rs.):       45,502.00         'ayable:       2.883.55						
Lase   Adhoc Relief All 2017 10%       3.607.00       3247       Adhoc Relief All 2018 10%       3.607.00         2264       Adhoc Relief All 2019 10%       3.607.00       0.00       0.00         Deductions - General       Wage type       Amount       Wage type       Amount         3015       GPF Subscription       -2.890.00       3501       Benevolent Fund       -600.00         1609       Income Tax       -145.00       3900       Emp.Edu, Fund KPK       -125.00         1004       R. Benefits & Death Comp:       -1.052.00       0.00       103.500.00         reductions - Leans and Advances       0.00       45.00.00       103.500.00       103.500.00         eductions - Income Tax       157.500.00       -4.500.00       103.500.00       103.500.00         eductions - Income Tax       ayable:       2.888.35       Recovered till August-2019:       290.00       Exempled: 1154.65       Recoverable:       1.443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9.312.00       Net Pay: (Rs.):       45,502.00         rayee Name: ABDUL AZIZ       ccount Number: 2039-7       Iaank Delails: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       eaves:       Opening Balance:       Availed:       Earmed:       Balance:	2199 Adhoc Relief Allow @10%		2211 Adhoc Relie	ef All 2016 10%		
Deductions - General       0.00         3015       GPF Subscription       2,890.00       3501       Benevalen, Fund       -600.00         1609       Income Tax       -1,052.00       990       Emp.Edu. Fund K.PK.       -1,25.00         0004       R. Benevilen, Fund       -600.00       -0.00       -0.00         reductions - Leans and Advances       -0.00       -0.00       -0.00         logs       GPF Loan Principal Instail       157,500.00       -4,500.00       103,500.00         eductions - Income Tax       -1,052.00       -4,500.00       103,500.00       103,500.00         eductions - Income Tax       -3,50.00       -4,500.00       103,500.00       103,500.00         eductions - Income Tax       -9,312.00       Net Pay: (Rs.):       1443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         rowen Ame: ADDUL AZIZ       ccount Number: 2039.7       Iaank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       eaves:       Opening Balance:       Availed:       Earned:       Balance         envanent Address:       UDenicile: NW - Khyber Pakhnunkhwa       Housing Status: No Official       ity:       Email:         22428/27.08.2019/00.23:43) 2) All am					····	
Wage type         Amount         Wage type         Amount           3015         GPF Subscription         -2,890.00         3501         Benevolent Fund         -600.00           1609         Income Tax         -145.00         3990         Emp. Edu. Fund KPK         -125.00           1004         R. Benefits & Death Comp:         -1,052.00         0.00         -0.00           reductions - Loans and Advances         0.00         4,500.00         103,500.00         103,500.00           coan         Description         Principal amount         Deduction         Balance           505         GPF Loan Principal Instal         157,500.00         4,500.00         103,500.00           eductions - Income Tax         ayable:         2,888.35         Recovered till August-2019:         290.00         Exempled: 1154.65         Recoverable:         1.443.70           ross Pay (Rs.):         54,814.00         Deductions: (Rs.):         -9,312.00         Net Pay: (Rs.):         45,502.00           'ayce Name: ABDUL AZIZ         cocount Number: 2039-7         Iank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI         eaves:         Opening Balance:         Balance           emanent Address:         VILL AND PO SWABI         Domicile: NW - Khyber Pakhtunkhwa         Housing Status: No Offic		1 3,007.00	<u> </u>		l	0.00
1015       GPF Subscription       2,890.00       1301       Benevolent Fund       -600.00         1609       Income Tax       -145.00       3990       Emp.Edu. Fund KPK       -125.00         1004       R. Benefits & Death Comp:       -1,052.00       0.00       0.00         veductions - Leans and Advances       -1,052.00       0.00       103,500.00         Loan       Description       Principal amount       Deduction       Balance         505       GPF Loan Principal Instal       157,500.00       4,500.00       103,500.00         eductions - Income Tax       ayable:       2,888.35       Recovered till August-2019:       290.00       Exempted: 1154.65       Recoverable:       1,443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         ayce Name: ABDUL AZIZ       vecount Number: 2039-7       and Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       eaves:       Opening Balance:       Availed:       Earned:       Balance         emanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pakhtunkhwa       Housing Status: No Official         ity:       Email:       Email:       2428/27.08.2019/00:23:43) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted <td< td=""><td>Deductions - General</td><td></td><td></td><td></td><td></td><td></td></td<>	Deductions - General					
011 011 0118018211001       -2,890.00       3501       Benevolent Fund       -600.00         0004 R. Benefits & Death Comp:       -145.00       3990       Emp.Edu. Fund KPK       -125.00         1004 R. Benefits & Death Comp:       -1,052.00       0.00       0.00         veductions - Loans and Advances       125.00       0.00       0.00         veductions - Loan Principal Instal       157,500.00       4.500.00       103,500.00         reductions - Income Tax       157,500.00       4.500.00       103,500.00         reductions - Income Tax       157,500.00       4.500.00       103,500.00         reductions - Income Tax       157,500.00       4.500.00       103,500.00         royable:       2,888.35       Recoverable:       1,443.70         royable:       2,888.35       Recoverable:       1,443.70         royable:       203.07       Exempted:       1154.65       Recoverable:         royable:       203.88.35       Recoverable:       1,443.70         royable:       203.97       Bank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI         caves:       Opening Balance:       Availed:       Earned:       Balance:         emanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pa		Amount	Ţ	Wage type	<u></u>	<b>_</b>
1004       R. Benefits & Death Comp:       -143.00       1990       Emp.Edu. Fund KPK       -123.00         Peduetions - Loans and Advances       1052.00       0.00       0.00         Peduetions - Loans and Advances       157,500.00       4,500.00       103,500.00         Peduetions - Income Tax       157,500.00       4,500.00       103,500.00         Peduetions - Income Tax       157,500.00       45,500.20       103,500.00         Peduetions - Income Tax       157,500.00       45,500.20       1,443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         Payeable:       2,888.35       Recoverable:       1,443.70       1,443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         Payee Name: ABDUL AZIZ       Kecount Number: 2039-7       Bank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       eaves:       Opening Balance:       Availed:       Earned:       Baláncé         emanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pakhtunkhwa       Housing Status: No Official         rup, Address:       ity:       Email:       Frons & omissions cacepied       VAUESTAN, 2019/00:23:43) 2) All amoun			3501 Benevolent	Fund		
Loan       Description       Principal amount       Deduction       Balance         5505       GPF Loan Principal Instal       157,500.00       4,500.00       103,500.00         reductions - Income Tax       ayable:       2,888.35       Recoverable:       1,443,70         rayable:       2,888.35       Recoverable:       1,443,70         irross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         'ayce Name:       ABDUL AZIZ       vecount Number: 2039-7       3048       20503 TOPI BRANCH TOPI BRANCH, SWABI         caves:       Opening Balance:       Availed:       Earned:       Balance:         ermanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pakhtunkhwa       Housing Status: No Official         emp. Address:       ILL AND PO SWABI       Ermail:       1         ity:       Ermail:       Ermail:       1			3990 Emp.Edu. F	und KPK	<u>.</u>	
Loan       Description       Principal amount       Deduction       Balance         1505       GPF Loan Principal Instal       157,500.00       4,500.00       103,500.00         reductions - Income Tax       ayable:       2,888.35       Recovered till August-2019:       290.00       Exempted: 1154.65       Recoverable:       1,443.70         iross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         'ayache:       200.01       ZIZ       vecount Number: 2039-7       Balance:       Availed:       Earned:       Balance:         'ayache:       Opening Balance:       Availed:       Earned:       Balance:       Balance:         envanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pakhtunkhwa       Housing Status: No Official         ity:       Email:       Email:       Email:       Imail:       Imail:		1	<u>I'I</u>		·····	0.00
Principal amount       Deduction       Balance         1503       GPF Loan Principal Instal       157,500.00       -4,500.00       103,500.00         reductions - Income Tax       ayable:       2,888.35       Recovered till August-2019:       290.00       Exempted: 1154.65       Recoverable:       1,443.70         ross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         Payce Name:       ABDUL AZIZ				· · · · · · · · · · · · · · · · · · ·		
1222       [017 L0an Frincepa Instal]       157,500.00       4,500.00       103,500.00         reductions - Income Tax ayable:       2,888.35       Recovered till August-2019:       290.00       Exempted: 1154.65       Recoverable::       1,443.70         iross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         Payce Name:       ABDUL AZIZ       Account Number: 2039-7       300.00       103,500.00       103,500.00         Payce Name:       ABDUL AZIZ       Account Number: 2039-7       300.00       100.00       100.00         Status:       NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       Earned:       Bialance:         caves:       Opening Balance:       Availed:       Earned:       Bialance:         remanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pakhtunkhwa       Housing Status: No Official         remp. Address:       Email:       Email:       82428/27.08.2019/00:23:43) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted       41.41		· .	Principal amount	Deductio	in l	
Payable:       2,888.35       Recovered till August-2019:       290.00       Exempled: 1154.65       Recoverable:       1.443.70         Pross Pay (Rs.):       54,814.00       Deductions: (Rs.):       -9,312.00       Net Pay: (Rs.):       45,502.00         Payee Name: ABDUL AZIZ       Vecount Number: 2039-7       Jank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       45,502.00         Sank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI       Balance:       Balance:         eaves:       Opening Balance:       A vailed:       Earned:       Balance:         ermanent Address:       VILL AND PO SWABI       Domicile: NW - Khyber Pakhtunkhwa       Housing Status: No Official         emp. Address:       Email:       Email:       82428/27.08.2019/00:23:43) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted	1993. [Orr Loan Principal Instal	· ·	157,500.00	-4,500.00		
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## VERSUS

- 1- The Government of Klyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar. 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
  - 4- The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 5- The Director (E&SE) Department, Knyber Pakhtunkhwa, Peshawar. ...RESPONDENTS

APPEAL UDNER SECTION-4 OF THE KHYBER-PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED THE RESPONDENTS BY ILLEGALLY UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE DURING WINTER & SUMMER VACATIONS AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

That on acceptance of this appeal the respondents may PICAYER: kindly be directed not to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the payment of all outstanding amount of Conveyance allowance which have been deducted Encate-day previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in

Registrar favor of the appellant. 91/01/N-C

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R/SHEWETH:

AT, TES IGN FACTS: 4- That the appellant is serving in the elementary and secondary education department as Certified Teacher (BPS-15) quite efficiency Enablished and up to the entire satisfaction of the superiors. SELE:

2- That the Conveyance Allowance is admissible to all the civil servant and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. That later ion vide revised Notification date: 20.12.2012 whereby the conveyance allowance for employee



#### Dist. Govt. NWFP-Provincial District Accounts Office Sawabi

Monthly Salary Statement (September-2019)



## Personal Information of Mr ABDUL AZIZ d/w/s of ALLAH DIN

Personnel Number: 00235525 - CNIC: 13089517184 NTN 0 Date of Birth: 18.12.1970 Entry into Govt. Service: 14.01.1993

Length of Service 26 Years 08 Months 018 Days

## Employment Category: Active Permanent

Designation: PRIMARY SCHOOL HEAD TEACH DDO Code: SU6236-Government Primary Schools (Male) Topi, Swabi

80004531-DISTRICT GOVERNMENT KHYBE

Payroll Section: 003 GPF Section: 001 Cash Center: 30 GPF A/C No: Interest Applied: Yes, GPF Balance: Vendor Number: -Pay and Allowances: Pay scale: BPS For - 2017

. . . Pay Scale Type: Civil BPS: 15 Pay Stage: 15

132,148.00

Wage type	Amount	Wage type	Amount
0001 Basić Pay	36,070.00	1000 House Rent Allowance	2,349.00
210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	797.00	2199 Adhoc Relief Allow @10%	535.00
211 Adhoc Relief All 2016 10%	2,742.00	2224 Adhoc Relief All 2017 10%	3,607.00
2247 Adhoc Relief All 2018 10%	3,607.00	2264 Adhoc Relief All 2019 10%	3,607.00
eductions - General			

#### Deductions - General

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Wage type	·	<u>Amount</u>	i.	Wage type	Amount
3015 GPF Subscription		-2,890.00	3501	Benevolent Fund	-600.00
3609. Income Tax				Emp.Edu. Fund KPK	-125.00
4004 R. Benefits & Death Comp:		-600.00			0.00

#### Deductions - Loans and Advances

			<u> </u>		A CARLEN AND A CARL AND	
Loan	Descr	iption		Principal amount	Deduction	Balance
6505	<b>GPF</b> Loan Principal Instal			157,500.00	-4.500.00	99.000.00
A H			2			33,000.00

#### Deductions # Income Tax

Payable: 4,31	6.35 Recovere	d till September-2019	521.00 Exem	pted: 1725:53 Recoverab	ole: 2,069.82
Gross Pay (Rs.):	57.670.00				
	5,,070.00	Deductions: (Rs.):	-8,940.00	Net Pay: (Rs.): 48,7	24.00

#### Payee Name: ABDUL AZIZ

Account Number: 2039-7

Bank Details: NATIONAL BANK OF PAKISTAN, 230503 TOPI BRANCH TOPI BRANCH, SWABI

#### Leaves: **Opening Balance:** Availed:

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Permanent Address:	VILL /	AND PO SW	ABI		<u> </u>				1 1243 1 1213
City: SWABI	÷		Domicile:	NW - Khvb	er Pakhtunkhwa	1. 2. 7	Houri	The Statuce Mo	Official
Temp. Address:		۰. بە		- <u>-</u>		· · · · · · ·			
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(232428/25.09.2019/22:35:48) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

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Balańce:

APPEAL NO. 1452 /2019

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Mr. Maqsad Hayat, SCT (BPS-16), GHS Masho Gagar, Peshawar.

#### VERSUS

APPE

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar. 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Accountant General, Khyber Pakhtunkhwa, Peshawar. 5- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar. RESPONDENTS

APPEAL UDNER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OF THE RESPONDENTS BY UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE DURING APPELLANT VACATIONS AND AGAINST NO ACTION TAKEN ON THE тне APPELLANT DEPARTMENTAL APPEAL OF STATUTORY PERIOD OF NINETY DAYS.

That on acceptance of this appeal the respondents may PRAYER: kindly be directed not to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the payment of all outstanding amount of Conveyance allowance which have been deducted Filedto-daypreviously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in

Registrar favor of the appellant.

R/SHEWETH: TESTON FACTS:

24/10/19

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 $\sim$ 1- That the appellant is serving in the elementary and secondary education department as Certified Teacher (BPS-15) quite efficiency Packinghows and up to the entire satisfaction of the superiors.

Tribunal, 2- That the Conveyance Allowance is admissible to all the civil servant and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. That later ion vide revised Notification dater 20.12.2012 whereby the conveyance allowance for employee

Affested

Learned counsel referred to the judgment passed by learned Federal Service Tribunal in Appeal No. 1888(R)CS/2016 which was handed down on 03.12.2018. Through the said judgment the issue of payment of Conveyance Allowance to a civil servant during summer and winter vacations was held to be within his entitlement and the deduction already made from him was to be reimbursed. Similar reference was made to the judgment by Honourable Peshawar High Court passed on 01.10.2019 in

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11.11.2019

the case of appellant. Learned counsel, when confronted with the proposition that the issue, in essence, was dilated upon by the Federal Service Tribunal and, more particularly, by the Honourable Peshawar High Court in the case of appellant, stated that in case the respondents are required to execute the judgment of Peshawar High Court, the appellant will have no cavil about disposal of instant appeal.

The record suggests that while handing down judgment in the Writ Petition preferred by the appellant, the Honourable High Court not only expounded the definition of "Pay" as well as "Salary" but also entitlement of a civil servant for the Conveyance Allowance during the period of vacations. It is important to note that the respondents were represented before the High Court during the proceedings.

In view of the above noted facts and circumstances and in order to protect the appellant from a fresh round of lifigation which may protract over a formidable period, the appeal in hand is disposed of with observation that the judgment of Honourable Peshawar High Court passed observation that the judgment of Honourable Peshawar High Court passed in Writ Petitions including W.P. No. 3162-P/2019 shall be honoured and implemented by the respondents within shortest possible time. The implemented by the respondents within shortest possible time. The appellant shall, however, be at liberty to seek remedy in accordance with a law in case his grievance is not redressed by the respondents within a reasonable time.

File be consigned to the record.

ANNOUNCE

11.11.2019

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Chairman

### To,

#### **The Secretary (E&SE) Department,** Khyber Pakhtunkhwa, Peshawar.

Subject:

# DEPARTMENTALAPPEALAGAINSTTHEIMPUGNEDACTIONOFTHE CONCERNEDAUTHORITY BY THE ILLEGALLY AND UNLAWFULLYDEDUCTION,THECONVEYANCE, ALLOWANCEDURING WINTER & SUMMER VACATIONS

Respected sir,

With due respect it is stated that i am the employee of your good self Department and is serving as PSHT(BPS15) quite efficiency and up to the entire Satisfaction of the superiors. It is stated for kind information that conveyance allowance is admissible to all the civil servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14/07/2011 was issued. Later on vide revised Notification dated 20/12/2012 whereby the conveyance allowance for the employee working in BPS 1 to 15 were enhance/revised while employee from BPS-16 to 19 have been treated under the previous Notification by not enhancing their Conveyance allowance. Respected Sir, I was receiving the Conveyance allowance as admissible under the law and rues but the concerned authority without any valid and justified reasons stopped/ deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for leave period. One of the employees of Education Department in Islamabad filed service appeal No 1888 (R) CS/2016 before the federal service Tribunal, Islamabad regarding conveyance allowance which was accepted by the Honourable service Tribunal vide judgment dated 03/12/2018 that i am also the similar employee of Education Department and under the principle of consistency I am also entitled for the similar treatment meted out in the above mentioned service appeal but the concerned authority is not walling to issued/grant the same Conveyance allowance which is granting to other employees. Copy attached. I am feeling aggrieved from the action of the concerned authority regarding deduction of conveyance allowance in vacations period/months preferred this Department appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal concerned authority may very kindly be directed the conveyance allowance may not be deducted from my monthly salary during winter & summer vacations.

Dated: 30/07/2020

Your obediently

Abdul Aziz PSHT( BPS-15),

"aner F." Page 11 بعدالت م ٢٨ سروس فرد مرد ال سدل Mr Abdul Azj3 2 يمنحاً ن مورجه مقدم دعوى Folucation Dept 7. باعث تحريراً نكر مقدمه مندرجه عنوان بالاميس اپن طرف ے داسطے پيروي وجواب دہي وکل کاروائي متعلقہ كيلي المشركان المرد وتدي آن مقام متيساعر مقرر کرے اقرار کیاجاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کوراضی نامه کرنے وتقرر ثالث وفیصلہ پر حلف دیتے جواب دہی اورا قبال دعویٰ اور 7 Of UN بصورت د گری کرنے اجراءاور وصولی چیک وروپ په ارعرضی دعویٰ اور درخواست ہرشم کی تصدیق زرایں پردستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری کیطرفہ یا بیل کی برامدگ AL اور منسوخی نیز دائر کرنے اپیل نگرانی ونظر تانی و پیروی کرنے کا مختار ہوگا۔از بصورت ضرورت مقدمہ مذکور کے کل یاجزوی کاردائی کے داسطے اور دکیل یا مختار قانونی کواپنے ہمراہ یا اپنے بجائے تقر رکااختیار ہوگا۔اورصاحب مقرر شدہ کوبھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اوراس کاساختہ پر داختہ منظور وقبول ہوگا دوران مقدمہ میں جوخر چہ ہرجانہ النوائے مقدمہ کے سب ، وہوگا کوئی تاریخ بیشی مقام دورہ پر ہو یا حد سے باہر ہوتو دکیل صاحب پابند ہوں گے۔ کہ بیروی مذکور کریں۔لہٰذا وکالت نامہ کھوریا کہ سندر ہے۔ الرتوم £20 Aud 0 Attested S Accepted کے لئے منظور ہے۔ 10 Lin مقام پ ستیشنز <u>ک</u> مار ب چوك مشتكر كايشاور شي نون: 2220193 Mob: 0345-9223239