

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Service Appeal No. 7122/2021

Date of Institution ... 29.07.2021

Date of Decision ... 14.07.2022

Abdul Subhan, Retired Chowkidar, GGCMS Zara Miana, Nowshera.

... (Appellant)

VERSUS

The Secretary (E&SE) Department, Khyber Pakhtunkhwa,
Peshawar and four others.

... (Respondents)

MR. TAIMUR ALI KHAN,
Advocate

--- For appellant.

MR. NASEER-UD-DIN SHAH,
Assistant Advocate General

--- For respondents.

MR. SALAH-UD-DIN
MS. ROZINA REHMAN

--- MEMBER (JUDICIAL)
--- MEMBER (JUDICIAL)

JUDGMENT:

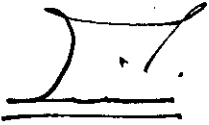
SALAH-UD-DIN, MEMBER:- Precisely stated the facts giving rise to filing of instant service appeal are that the appellant was appointed as Naib Qasid on 24.04.1998. The appellant was born in the year 1953 and was to retire on 30.06.2013 on attaining the age of superannuation but the competent Authority did not issue his order of retirement and the appellant thus carried out his duties till March 2016. The appellant received salaries till March 2016 i.e beyond the age of superannuation. The competent Authority belatedly issued retirement order of the appellant on 20.10.2020, whereby the appellant was retired from service with effect from 30.06.2013. The appellant was granted commutation and

pension on his retirement, however salaries amounting to Rs. 569782/- received by the appellant for the period from 01.07.2013 to March 2016 were deducted from his pension, which compelled the appellant to file departmental appeal, however the same was not responded within the statutory period of 90 days, hence the instant service appeal.

2. Respondents contested the appeal by way of submitting para-wise comments, wherein they refuted the assertions raised by the appellant in his appeal.

3. Learned counsel for the appellant has contended that the retirement of the appellant was due on 30.06.2013 but the competent Authority did not issue retirement order of the appellant in time and he thus actively performed his duty till the month of March 2016; that copies of attendance register, annexed with the appeal supports the stance of the appellant that he had performed his duties till the month of March 2016; that the appellant was an illiterate Class-IV employee and it was fault of the competent Authority that his retirement order was issued after considerable delay on 20.10.2020 instead of 30.06.2013; that the appellant suffered mental torture agony at the hands of competent Authority as the pensionary benefits were handed over to him after considerable long period; that nothing is available on the record, which could show that the appellant was having any connivance in the late issuing of retirement order of the appellant, therefore, the respondents were not justified in recovery of salaries received by the appellant after attaining the age of superannuation. Reliance was placed on 2001 PLC (C.S) 1092 and 2017 PLC (C.S) 331.

4. On the other hand, learned Assistant Advocate General for the respondents has contended that the appellant was well aware of the date of his superannuation but he illegally received salaries till March 2016; that the appellant somehow managed to get lost his service book, therefore, the competent Authority could not issue retirement order of the appellant in time; that on attaining the age of superannuation, the



appellant automatically stood retired on 30.06.2013, therefore, the salaries received by him beyond the age of his superannuation were rightly deducted from his pension; that the appellant had intentionally concealed the age of his superannuation and his appeal is liable to be dismissed with cost.

5. We have heard arguments of learned counsel for the parties and have perused the record.

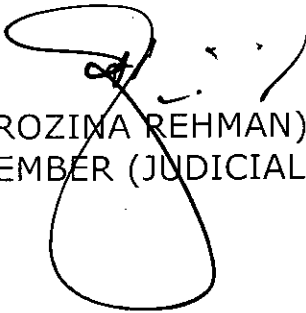
6. A perusal of the record would show that the date of birth of the appellant is 01.07.1953 and his retirement was due on 30.06.2013. The competent Authority, however did not issue any notification regarding the retirement of the appellant and he continued his duties till March 2016. The respondents have not denied the fact that the appellant actively performed his duties till March 2016. It appears that the appellant was not given any salary beyond the month of March 2016 but the competent Authority delayed issuing of retirement order of the appellant and the same was ultimately issued on 20.10.2020, whereby the appellant stood retired with effect from 30.06.2013. The appellant has categorically alleged that he being illiterate was unaware of the date of his retirement. Respondents have not brought anything on the record, which could show that the delayed issuing of order of retirement of the appellant was the result of any fault on the part of the appellant. The date of birth of a civil servant is entered in his service book and other relevant service documents, therefore, it was the responsibility of the competent Authority to have issued the retirement order of the appellant in time. The appellant had attained the age of superannuation on 30.06.2013 but the notification regarding his retirement was issued on 20.10.2020, regarding which no plausible reason has been furnished by the respondents in their comments. According to Pension Roll Data Sheet issued to the appellant, an amount of Rs. 569782/- was deducted from his pension as the salaries received by him beyond the age of superannuation. It is evident from the record that it was the

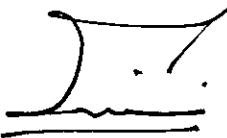


department, which allowed the appellant to perform his duty beyond the age of superannuation, therefore, the department was estopped through its own conduct from deducting the concerned amount from the pension of the appellant. Wisdom in this respect derived from the judgment titled "Rana Muhammad Shaif Versus Chief Engineer, Irrigation and others", reported as 2000 PLC (C.S) 480.

7. In view of the above discussion, the appeal in hand is allowed as prayed for. Parties are left to bear their own cost. File be consigned to the record room.

ANNOUNCED
14.07.2022


(ROZINA REHMAN)
MEMBER (JUDICIAL)

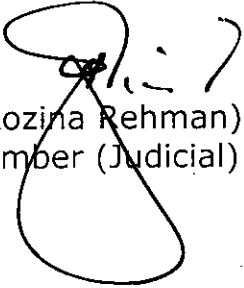

(SALAH-UD-DIN)
MEMBER (JUDICIAL)

O R D E R
14.07.2022


Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand is allowed as prayed for. Parties are left to bear their own cost. File be consigned to the record room.

ANNOUNCED
14.07.2022



(Rozina Rehman)
Member (Judicial)



(Salah-Ud-Din)
Member (Judicial)

7122/21
23.12.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG alongwith Shafiq HC Clerk for the respondents present.


The respondents have not furnished reply/ comments and seek further time. Let the respondents be afforded with last opportunity with the warning that in case they fail to submit the written reply/comments on or before next date, their right for reply/comments shall be deemed as struck off by virtue of this order. Case to come up for arguments on 06.04.2022 before the D.B.


Chairman

06.04.2022

Clerk of the counsel for appellant present. Mr. Kabirullah Khattak Adl. AG along with Miss. Roheen ADO (Legal) for respondents present. Written reply has been submitted by respondents No. 1 to 3 which is placed on file.

Counsel are at strike. Therefore the case is adjourned to 11.07.2022 before D.B.


(Mian Muhammad)
Member (E)


Chairman

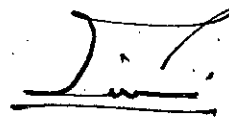
13.07.2022

Learned counsel for the appellant present.

Mr. Naseer Ud Din Shah, Assistant Advocate General for respondents present.

Partial arguments heard. To come up for remaining arguments on 14.07.2022 before the D.B.

(Rozina Rehman)
Member (J)


(Salah-Ud-Din)
Member (J)

Abdul Subhan 7122/2021

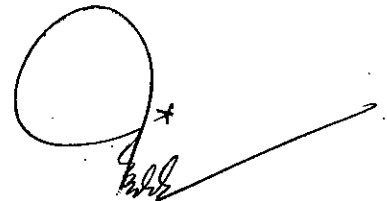
06.09.2021

Counsel for the appellant present. Preliminary arguments heard.

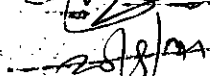
Learned counsel for the appellant contended that the appellant is aggrieved from impugned order dated 21.01.2021 which is basically pay slip of the appellant and recovery to the tune of Rs. 569782/- is to be made from his pension. It was on part of the respondents that the appellant being an illiterate Class-IV was not retired on attaining the age of superannuation on 30.06.2013. His retirement notification was issued on 20.10.2020 but w.e.f 30.06.2013 (his date of superannuation). During the said period, the appellant did perform his duties and attendance register is evident to have actually worked beyond the date of superannuation. It was admitted that there is no original or appellate order to have been issued and then challenged or impugned. However, it is recurring cost and recurring cause of action which may be entertained and admitted for regular hearing. In support of his arguments, he placed reliance on 2017 PLC (C.S) 331 and 2018 PLC (CS) 375. He, therefore, requested that the appellant is not at fault and the period served beyond superannuation be treated as "contract employment" and the amount of recovery from his pension be declared as unjustified and illegal.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively.

If the written reply/comments are not submitted within the stipulated time or extension of time is not sought, the office shall submit the file with a report of non-compliance. File to come up for arguments on 23.12.2021 before the D.B.



(Mian Muhammad)
Member(E)

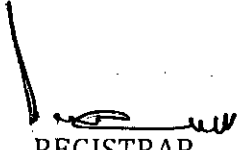

Appellant Deposited
Security Process Fee


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7122 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/07/2021	<p>The appeal of Mr. Abdul Subhan presented today by Mr. Taimur Ali Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR ^{Adhes}

CHECK LIST

Case Title: Abdul Subhan vs Secretary (E SSO)

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Whether appeal is within time?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Whether the enactment under which the appeal is filed mentioned?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Whether the enactment under which the appeal is filed is correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Whether affidavit is appended?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Whether affidavit is duly attested by competent Oath Commissioner?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Whether appeal/annexures are properly paged?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Whether annexures are legible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	Whether annexures are attested?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12	Whether copies of annexures are readable/clear?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Whether copy of appeal is delivered to AG/DAG?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15	Whether numbers of referred cases given are correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Whether appeal contains cutting/overwriting?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Whether list of books has been provided at the end of the appeal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Whether case relate to this court?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19	Whether requisite number of spare copies attached?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
20	Whether complete spare copy is filed in separate file cover?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21	Whether addresses of parties given are complete?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	Whether index filed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
23	Whether index is correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	Whether Security and Process Fee deposited? On	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26	Whether copies of comments/reply/rejoinder submitted? On	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27	Whether copies of comments/reply/rejoinder provided to opposite party? On	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Name:

Taimur Adikhan

Signature:

[Signature]

Dated:

29/7/21

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2021

Abdul Subhan

V/S

Secretary (E&SE) & others

INDEX

S. No.	Documents	Annexure	P. No.
01.	Memo of appeal	-----	01-04
02.	Affidavit	-----	05
03.	Copy of attendance register	A	06-29
04.	Copy of order dated 20.10.2020	B	30
05.	Copy of pension slip	C	31
06.	Copy of notice dated 12.03.2021	D	32-33
07.	Copies of departmental appeal and letter dated 19.04.2021	E&F	34-37
08.	Vakalat Nama	-----	38

APPELLANT

THROUGH:



**(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT**

Room No. FR 8, 4th Flour,
Bilour plaza, Peshawar cantt:
Cell# 0333-9390916

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Service Appeal No. 7122/2021

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 7382

Dated 29-7-2021

Abdul Subhan, Retired-Chowkidar
GGCMS Zara Miana, Nowshera.

APPELLANT

VERSUS

1. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Female), Nowshera.
4. The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
5. The District Account Officer, Nowshera.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED ACTION OF THE
RESPONDENTS OF RECOVERY/DEDUCTION OF AMOUNT
OF RS.569782/- FROM THE PENSION OF THE APPELLANT
AND AGAINST NOT TAKING ACTION ON THE
DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE
STATUTORY PERIOD OF NINETY DAYS.

Filed to-day
Registrar
29/7/2021

PRAYER

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE
RESPONDENTS MAY KINDLY BE DIRECTED TO MAKE
THE PAYMENT OF RECOVERED/DEDUCTED AMOUNT
OF WORTH OF RS. 569782/-, WHICH WAS ILLEGALLY
RECOVERED/DEDUCTED FROM THE PENSION OF THE
APPELLANT FOR THE PERIOD ON WHICH HE HAS
PERFORMED DUTY. ANY OTHER REMEDY WHICH THIS
AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE

2

**THAT MAY ALSO BE AWARDED IN FAVOUR OF
APPELLANT.**

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant being illiterate was appointed as Naib Qasid on 24.04.1998 in the education department and since his appointment the appellant has performed his duty with great devotion and honesty whatsoever assigned to him.
2. That the appellant was born in the year 1953 and would be retired on 30.06.2013 on attaining the age of superannuation, but the respondent No.4 did not pass an order in respect of retirement of the appellant in time and the appellant being illiterate has continued his duty and regularly performed duty till March 2016 and also received salaries for that period, which is evident from the attendance register of the concerned school. **(Copy of attendance register is attached as Annexure-A)**
3. That the respondent No.3 passed an order dated 20.10.2020, whereby the appellant was retired from service on superannuation with effect from 30.06.2013. **(Copy of order dated 20.10.2020 is attached as Annexure-B)**
4. That the appellant has granted his commutation and pension on his retirement, but received salaries of worth of Rs.569782/- for the period with effect from 1.07.2013 till March 2016 on which the appellant has performed his duty was illegally recovered from the pension of the appellant, which is evident from the pension slip of the appellant. **(Copy of pension slip is attached as Annexure-C)**
5. That the appellant filed compliant to Provincial Ombudsman for recovery of that deducted amount which is evident from the notice dated 12.03.2021 of the Provincial Ombudsmen, but no positive response has been given to the appellant on that complaint by Provincial Ombudsman. **(Copy of notice dated 12.03.2021 is attached as Annexure-D)**
6. That as the amount of worth of Rs.569782/- was illegally recovered/deducted from the pension of the appellant, because he was not retired in time i.e 30.06.2013 by the competent authority and was

3

continuously and regularly performed duty till March 2016 due to which he received salaries for that period, therefore the appellant filed departmental appeal on 07.04.2021 for grant of that recovered/deducted amount of worth of Rs. 569782/- on which detail reports/comments was called from respondent No.4 by the appellant authority vide letter dated 19.04.2021, however the departmental appeal of the appellant was not decided within the statutory period of ninety days. (Copies of departmental appeal and letter dated 19.04.2021 are attached as Annexure-E&F)

7. That appellant being aggrieved and having no other remedy except to file the instant service appeal on the following grounds amongst the others.

GROUND:

- A) That recovery/deduction of Rs.569782/- from the pension of the appellant is against facts, norms of justice and material on record, therefore, not tenable and the recovered/deducted amount of worth of Rs.569782/- may kindly be granted to the appellant.
- B) That the appellant was born in the year 1953 and would be retired on 30.06.2013 on attaining the age of superannuation, but the respondent No.4 did not pass an order in respect of retirement of the appellant in time and the appellant being illiterate has continued his duty and regularly performed duty till March 2016 and also received salaries for that period, therefore the appellant could not be punished for the fault of the other in shape of recovery/deduction for the period on which he has performed his duty.
- C) That the appellant would be retired on 30.06.2013 on attaining the age of superannuation and it was the responsibility of the competent authority to pass the order of retirement of the appellant in time and not allowed him to perform after his superannuation, but the retirement order of the appellant was passed on 20.10.2020 and the appellant being illiterate has continued his duty and performed that duty till March 2016, and now recovery of worth of Rs.569782/- from the pension for the period on which he has performed his duty is against the norms of justice and fair play.

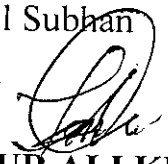
- D) That the appellant has regularly performed duty with effect from 01.07.2013 till March 2016, which is evident from the attendance register of the school and recovery of Rs.569782/- from the pension of the appellant for that period amounts to force labour, which is violation of Article-11 of Constitution of Islamic Republic of Pakistan, 1973.
- E) That the appellant being a low paid employee (Class-IV) and recovery/deduction of Rs.569782/- from his pension on the fault of the others has badly effect his financial position.
- F) That the action of the respondents is without any legal authority, discriminatory and in clear violation of fundamental rights duly conferred by the Constitution and is liable to be declared as null and void.
- G) That as the act of the respondents is illegal, without any legal authority and not only discriminatory but also the result of malafide on the part of respondents.
- H) That the appellant seeks permission of this Honorable Tribunal to advance other grounds and proofs at the time of hearing.

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

عبدالرحمان
 APPELLANT

Abdul Subhan

THROUGH:



(TAIMUR ALI KHAN)
 ADVOCATE HIGH COURT

CERTIFICATE:

It is certified that no other similar service appeal between the parties has been filed earlier.

عبدالرحمان
 DEPONENT

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2021

Abdul Subhan

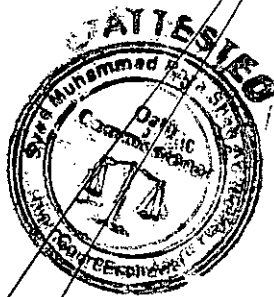
V/S

Education Deptt:

.....

AFFIDAVIT

I, Abdul Subhan, Retired-Chowkidar, GGCMS Zara Miana, Nowshera, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honourable Tribunal.



عبدال سبحان
DEPONENT
Abdul Subhan
(APPELLANT)

29/7/21

رجسٹر حاضر و مدرسین

A (6)

2013ء

بابت ماہ اکتوبر

نام	زبیرہ بیگم	سعدیہ	گلشنہ افضل	عبد الہمان
عہدہ	P.S.T	P.S.T	P.S.T	زائیکہ قاسم

تاریخ	آمد	دستخط	رہائی	آمد	دستخط	رہائی	آمد	دستخط	رہائی	آمد	دستخط	رہائی
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قسم	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
انسانی												
استحقاقی												
بھاری												
میزان												

Head Mistress
G.G. CMS
Zara Miana (NSR)

دستخط ہیڈ ماسٹر

ATTESTED

1 P
2 P
3 P
4 P
5 P
6 P
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20 P
21 P
22 P
23 P
24 P
25 P
26 P
27 P
28 P
29 P
30 P
31 P

Headmistress
G.G. CMS
Zara Miana (NSR)

رجسٹر حاضری مدرسین

	بارشہادہ	سیدہ	2013	
نام	ز. مہر بیگم	میں سہ ماہی	گفتہ افضل	شعبہ السیاح
عہدہ	P.S.T	44	P.S.T	ناگب آباد

تاریخ	آہ	دستخط	رواگی	آہ	دستخط	رواگی	آہ	دستخط	رواگی	آہ	دستخط	رواگی
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31												

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اقاریہ	1	1	1									
استحقاقی												
بیماری												
میزان												

Head Mistress
G.G. CMS
Zara Miana (NSR)

ATTESTED

رجسٹر حاضری مدرسین

2014ء

ماہنامہ جنوری

نام: ظاہرہ اختر
عہدہ: P.S.T

نمبر	ام	دستخط	رواگی	دستخط	ام	دستخط	رواگی	دستخط	ام	دستخط	رواگی	دستخط	ام	دستخط
1														
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Sunday

تعین عمر میلادین

on duty at Aki Abad
عمر میلادین

on duty at Aki Abad

on duty at Aki Abad

on duty at Aki Abad

on duty at Aki Abad

on duty at Aki Abad

دستخط
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P
P
میزان

Head Mistress
G.G.CMS
Zara Miana (NSR)

TESTED

رجسٹر حاضری مدرسین

بابت ماہ فروری 2014ء

نام	فہرست نام
عہدہ	ناشر ہذا

درجہ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8:30	P	1:30	P											
2	الترار														
3	8:30	P	1:30	P											
4	8:30	P	1:30	P											
5															
6	8:30	P	1:30	P											
7	8:30	P	1:30	P											
8	8:30	P	1:30	P											
9															
10	8:30	P	1:30	P											
11	8:30	P	1:30	P											
12	8:30	P	1:30	P											
13	8:30	P	1:30	P											
14	8:30	P	1:30	P											
15	8:30	P	1:30	P											
16															
17	8:30	P		P											
18	8:30	P	1:30	P											
19	8:30	P	1:30	P											
20	8:30	P	1:30	P											
21	8:30	P	11:45	P											
22	8:30	P	1:30	P											
23															
24	8:30	P	1:30	P											
25	8:30	P	1:30	P											
26	8:30	P	1:30	P											
27	8:30	P	1:30	P											
28	8:30	P	11:45	P											
29															
30															
31															

Grade 10

OM

dlv

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان

HEAD MISTRESS
G.G. CMS

Head Mistress
G.G. CMS
Zara Miana (NSR)

HEAD MISTRESS
G.G. CMS
Pirbright
19-2-14

رجسٹر حاضر مدرسیں

(10)

2014

بابت ماہ مارچ

	عبدالسوان
	تائب قاسم

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8:30	P	1:30	P											
2															
3	8:30	P	1:30	P											
4	8:30	P	1:30	P											
5	8:30	P	1:30	P											
6	8:30	P	1:30	P											
7	8:30	P	11:45	P											
8	8:30	P	1:30	P											
9															
10	8:30	P	1:30	P											
11	8:30	P	1:30	P											
12	8:30	P	1:30	P											
13	8:30	P	1:30	P											
14	8:30	P	11:45	P											
15	8:30	P	1:30	P											
16															
17	8:30	P	1:30	P											
18	8:30	P	1:30	P											
19	8:30	P	1:30	P											
20	8:30	P	1:30	P											
21															
22	8:30	P	1:30	P											
23															
24	8:30	P	1:30	P											
25	8:30	P	1:30	P											
26	8:30	P	1:00	P											
27	8:30	P	1:00	P											
28	8:30	P	11:45	P											
29	8:30	P	1:00	P											
30															
31															

نمبر رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انقارہ	-	-	-	-	-	-	-	-	-	-	-	-
استحقاق	-	-	-	-	-	-	-	-	-	-	-	-
بیماری	-	-	-	-	-	-	-	-	-	-	-	-
میزان												

دستخط ہیڈ ماسٹر

Head Mistress
G.G. CMS
Zara Miana (NSR)

ATTESTED

رجسٹر حاضری مدرسین

20/2

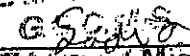
بابت ماہ اپریل

نام _____
 نمبر السبب _____
 نمبر قاصر _____

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	P														
2															
3															
4															
5															
6															
7															
8	P	12:30	P	7:30											
9	P	12:30	P	7:30											
10	P	12:30	P	7:30											
11	P	12:30	P	7:30											
12	P	12:30	P	7:30											
13															
14	P	12:30	P	7:30											
15	P	12:30	P	7:30											
16	P	12:30	P	7:30											
17	P	12:30	P	7:30											
18	P	12:30	P	7:30											
19	P	12:30	P	7:30											
20															
21	P	12:30	P	7:30											
22	P	12:30	P	7:30											
23	P	12:30	P	7:30											
24	P	12:30	P	7:30											
25	P	12:00	P	7:30											
26	P	12:30	P	7:30											
27															
28	P	12:30	P	7:30											
29	P	12:30	P	7:30											
30	P	12:30	P	7:30											
31															

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

HEAD MISTRESS:

G.S. 
 Head Mistress
 G.G. CMS
 Zara Miana (NSR)

دستخط ہیڈ ماسٹر

ATTENDED

دستخط
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 میزان

رجسٹر حاضری مدرسین

2019ء

بابت ماہ مئی

نام: _____
 نمبر: _____

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1															
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قسم	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
انقارہ	1	1										
استحقاقی												
بیماری												
میزان												

Head Mistress
 G.G. CMS
 Zara Miana (NSR)

ATTESTED

10

دستخط

میزان

رجسٹر حاضر و مدرسین

2019

بابت ماہ ستمبر

نام
عہدہ

محمد ایمان

ناٹنگ قاضی

تاریخ	آمد	دستخط	رہائی	آمد	دستخط	رہائی	آمد	دستخط	رہائی	آمد	دستخط	رہائی	آمد	دستخط	رہائی
1	7:30	P	12:30	P											
2	7:30	P	12:30	P											
3	7:30	P	12:30	P											
4	2:00	P	12:30	P											
5	7:30	P	11:00	P											
6	7:30	P	12:30	P											
7		P		P											
8	7:30	P	12:30	P											
9	7:30	P	12:30	P											
10	7:30	P	12:30	P											
11	7:30	P	12:30	P											
12	7:30	P	11:00	P											
13	7:30	P	12:30	P											
14		P		P											
15															
16	7:30	P	12:30	P											
17	7:30	P	12:30	P											
18	7:30	P	12:30	P											
19	7:30	P	11:00	P											
20	7:30	P	12:30	P											
21															
22	7:30	P	12:30	P											
23	7:30	P	12:30	P											
24	7:30	P	12:30	P											
25	7:30	P	12:30	P											
26	7:30	P	11:00	P											
27	7:30	P	12:30	P											
28															
29	7:30	P	12:30	P											
30	7:30	P	12:30	P											
31															

تشریحات	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
افتتاحی	x											
احتمالی												
بیماری												
میزان												

Fazelat
Head Mistress
G.G. CMS
Zara Miana (NSR)

دستخط ہیڈ مائسٹر

ATTESTED

66

(19)

رجسٹر حاضری مدرسین

2019ء

بابت ماہ اکتوبر

فضیلت مسلم
S.S.T

نمبر السمان

نائب قاضی

نام

عہدہ

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	
1	7:30	P														
2	7:30	P														
3	7:30	P														
4																
5			انڈیا			انڈیا						انڈیا			انڈیا	
6																
7																
8																
9	7:30	P														
10	7:30	P														
11	7:30	P														
12			انڈیا			انڈیا						انڈیا			انڈیا	
13	7:30	P														
14	7:30	P														
15	8:30	P														
16	8:30	P														
17	8:30	P														
18	8:30	P														
19			انڈیا			انڈیا						انڈیا			انڈیا	
20	8:30	P														
21	8:30	P														
22	8:30	P														
23	8:30	P														
24	8:30	P														
25	8:30	P														
26			انڈیا			انڈیا						انڈیا			انڈیا	
27																
28	8:30	P														
29	8:30	P														
30	8:30	P														
31	8:30	P														

FB 1:30 FB 11:00
Cleave

مہرخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقیہ	X											
استحقاق												
بھاری												
میزان												

FazeeLat
Head Mistress
G.G. CMS
Zara Miana (NSR)

دستخط ہیڈ ماسٹر

ATTESTED

دستخط	
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میزان

06

رجسٹر حاضر و مدرسین

بابت ماہ

20

عبد السلام

ظاہرہ الکریم

نام

نائب قاضی

P.S.T

عہدہ

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
1	8:30															
2																
3																
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5	8:30															
6	8:30															
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میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

دستخط ہیڈ ماسٹر

ATTENDED

میزان

اتاقیہ

استحقاقی

بھاری

میزان

2014ء

بابت ماہ

رجسٹر حاضری مدرسین

17

۶

	عبدالحامد ناٹ قاندر			مس ظاہر اکبر P.S.T			
	P 1:30	P 8:30		# 1:30	# 8:30		1
	P 1:30	P 8:30		# 1:30	# 8:30		2
	P 1:30	P 8:30		# 1:30	# 8:30		3
	P 1:30	P 8:30		# 1:30	# 8:30		4
	P 1:30	P 8:30		# 1:30	# 8:30		5
	P 1:30	P 8:30		# 1:30	# 8:30		6
	SUNDAY			SUNDAY			7
	P 1:30	P 8:30		# 1:30	# 8:30		8
	P 1:30	P 8:30		# 1:30	# 8:30		9
	P 1:30	P 8:30		# 1:30	# 8:30		10
	P 1:30	P 8:30		# 1:30	# 8:30		11
	P 1:30	P 8:30		# 1:30	# 8:30		12
	P 1:30	P 8:30		# 1:30	# 8:30		13
	SUNDAY			SUNDAY			14
	P 1:30	P 8:30		# 1:30	# 8:30		15
	P 1:30	P 8:30		# 1:30	# 8:30		16
		P 8:00					17
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							30
							31

شن افضل	
P.S	
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G
G.A 1:30	G

		01	x			07	x

~~ATTESTED~~

Fazeelat Begum
 Head Mistress
 G.G. CMS
 Zara Miana (NSR)

کیونٹی ماڈل اسکول ڈیڑھ میلادہ
رجسٹر حاضری مدرسین

بابت ماہ جنوری 2015ء

عدد التعلیم				مس نظام اکبر				رقم
نام قائمہ				P.S.T				

آمد	حفظ	رواگی	حفظ	آمد	حفظ	رواگی	حفظ	آمد	حفظ	رواگی	حفظ
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SUNDAY				SUNDAY							18
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SUNDAY				SUNDAY							24
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											31

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان
------	-------	-------	------	-------	-------	------	-------	-------	------	-------	-------

											01
											اتفاقہ
											استحقاق
											بیماری
											میزان

افتتاح

رقم

حفظ

رواگی

حفظ

رواگی

حفظ

رواگی

حفظ

رواگی

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حفظ

رواگی

حفظ

2015ء

بابت ماہ فروری

رجسٹر حاضری مدرسین

نام پ قاصد		س ظاہرہ اکبر		پست
				PST

آر	م	م	م	م	م	م	م	م	م
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SUNDAY				SUNDAY				1
P	1-30	P	8-00	#	1-30	#	8-30	2
P	1-30	P	8-00	#	1-30	#	8-30	3
P	1-30	P	8-00	#	1-30	#	8-30	4
								5
P	11-30	P	8-00	#	11-30	#	8-30	6
P	1-30	P	8-30	#	11-30	#	8-30	7
SUNDAY				SUNDAY				8
P	1-30	P	8-00	#	1-30	#	8-30	9
P	1-30	P	8-00	#	1-30	#	8-30	10
P	1-30	P	8-00	#	1-30	#	8-30	11
P	1-30	P	8-00	#	1-30	#	8-30	12
P	11-30	P	8-00	#	11-30	#	8-30	13
P	1-30	P	8-00	#	1-30	#	8-30	14
SUNDAY				SUNDAY				15
P	1-30	P	8-00	#	1-30	#	8-30	16
P	1-30	P	8-00	#	1-30	#	8-30	17
P	1-30	P	8-00	#	1-30	#	8-30	18
P	1-30	P	8-00	#	1-30	#	8-30	19
P	11-30	P	8-30	#	11-30	#	8-30	20
P	1-30	P	8-00	#	1-30	#	8-30	21
SUNDAY				SUNDAY				22
P	1-30	P	8-00	ON Duty Arif Abad				23
P	1-30	P	8-00	/	/	/	/	24
P	1-30	P	8-00	/	/	/	/	25
P	11-30	P	8-00	/	/	/	/	26
P	1-30	P	8-00	/	/	/	/	27
				/	/	/	/	28
								29
								30
								31

شن	اقبل	PST
SUN	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	C. Leo	
	SUN	
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	SUN	
	ON DUTY	
	SUN	
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30
	G.A	1-30

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان
ATTTESTED											

Fazelat Head Mistress
G.G. CMS
Zara Miana (NSR)

رجسٹر حاضری مدرسین

بابت ماہ

2015ء

عبدالرحمان		س ظاہر اکبر	
ناٹ قائم			

Sunday				Sunday				1		
	F	1.20	P	8.00		F	1.30	F	8.30	2
	P	1.30	P	8.00		F	1.20	F	8.20	3
	P	1.30	P	8.00		F	1.30	F	8.30	4
	P	1.30	P	8.00		F	1.30	F	8.30	5
	P	11.30	P	8.00		F	11.30	F	8.30	6
	P	11.30	P	8.00		F	1.30	F	8.30	7
SUNDAY				SUNDAY				8		
	P	1.30	P	8.30	c. leave				9	
	P	1.30	P	8.00		F	1.30	F	8.30	10
	P	1.30	P	8.00		F	1.30	F	8.30	11
	P	1.30	P	8.00		F	1.30	F	8.30	12
	P	1.30	P	8.00		F	11.00	F	8.3	13
	P	1.30	P	8.00		F	1.30	F	9.00	14
Sunday				Sunday				15		
	P	1.30	P	8.00		F	1.30	F	8.30	16
	P	1.30	P	8.00	ON Duty XiFabad				17	
	P	1.30	P	8.00		"	"	"	"	18
	P	1.30	P	8.00		"	"	"	"	19
	P	11.30	P	8.00		"	"	"	"	20
	P	1.30	P	8.00		"	"	"	"	21
Sunday				Sunday				22		
	P	1.30	P	8.00	ON duty				23	
	P	1.30	P	8.00		F	1.30	F	8.30	24
	P	1.30	P	8.00		F	1.30	F	8.30	25
	P	11.00	P	8.00		F	11.30	F	8.30	26
	P	1.30	P	8.00		F	1.30	F	8.30	27
Sunday				Sunday				28		
	P	1.30	P	8.00		F	1.30	F	8.30	29
	P	1.30	P	8.00		F	1.30	F	8.30	30
	P	1.30	P	8.00		F	1.30	F	8.30	31

حالت	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
مقبول				x	x	x						
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ATTESTED

Head Mistress
G.G. CMS
Zara Miana (NSR)

63

۲۰۱۵

نقشه بیان (C.M.S)

رجسٹر حاضری مدرسین

Nasim Bari Office
Assistant District
Office
21-9

عبد الجبار
ناث قاهر

سین ظاہر اکبر
S.P.S.T

نقشه بیان
۲۰

گنتیفائل
CPST

Attendance grid with columns for dates, morning (P) and afternoon (A) shifts, and days of the week (Sunday, Monday, etc.). Includes handwritten entries and time slots like 12:30, 7:00.

Secondary attendance grid on the right side, with columns for dates and time slots, and rows for days of the week.

Sub Director
Office
21-9
Head Mistress
Zara Miana

ATTESTED

03 01
04

Small grid at the bottom right with columns labeled 'ال', 'سابقہ', 'میزان' and rows for 'اتفاقية', 'امتحان', 'پیارى', 'میزان'.

بابت ماہ اکتوبر 2015

G.G.C.M.S

29

رجسٹر حاضری مدرسین

عبدالرحمان
ناٹک قاضی

میں فاضلہ اکبر
S.P.S.T

فائین افسر
P.S.T

P 12:30	P 7:30	P 12:30	P 7:30	F 12:30	F 7:30	1
P 12:30	P 7:30			F 12:30	F 7:30	2
	P 7:00			F 12:30	F 7:30	3
Sunday						
P 1:30	P 8:30			F 1:30	F 8:30	5
P 1:30	P 8:00					6
P 1:30	P 8:00			F 1:30	F 8:30	7
P 1:30	P 8:00			F 1:30	F 8:30	8
P 11:30	P 8:00			F 11:30	F 8:30	9
P 1:30	P 8:00			F 1:30	F 8:30	10
Sunday						
P 1:30	P 8:00			F 1:30	F 8:30	12
P 1:30	P 8:00			F 1:30	F 8:30	13
P 1:30	P 8:00			F 1:30	F 8:30	14
شہادت حضرت محمد فاروق						
P 11:30	P 8:00			F 11:30	F 8:30	16
P 1:30	P 8:00			F 1:30	F 8:30	17
Sunday						
P 1:30	P 8:00			F 1:30	F 8:30	19
P 1:30	P 8:00			F 1:30	F 8:30	20
P 1:30	P 8:00			F 1:30	F 8:30	21
A	A			F 1:30	F 8:30	22
تذکار یوم عاشورا						
Sunday						
C. Leave						
P 1:30	P 8:00			F 1:30	F 8:30	27
P 1:30	P 8:00			F 1:30	F 8:30	28
P 1:30	P 8:00			F 1:30	F 8:30	29
P 11:30	P 8:00			F 11:30	F 8:30	30
	P 8:00			F	F 8:30	31

G.A 12:30	G.
G.A 1:00	G.
G.A 12:30	G.
Sunday	
G.A 1:30	G.A
G.A 1:30	G.A
G.A 1:30	G.A
G.A 1:30	G.A
G.A 11:30	G.
Sunday	
G.A 1:30	G.A
G.A 1:30	G.A
G.A 1:30	G.A
G.A 11:30	G.A
Sunday	
G.A 1:30	G.A
G.A 1:30	G.A
G.A 1:30	G.A
G.A 1:30	G.A

01	01			04	x
ATTESTED					
02				04	

Fazoulat
Head Mistress
G.G. CMS
Zara Miana (NSR)

SHAMA STATIONERY STORE PH: 7226599 - 7248132

میٹرن	سابقہ
	03
04	

checked by ASD 2015

12/15
بابت ماہ

26

رجسٹر حاضری مدرسین

NASIM BUKHARI
DISTRICT OFFICER
Sec Edu OFFICE
MERA

میں ظاہر ہو کر
SPST

	P 1:30	P 8:00				+	1:30	+	8:20	1
	P 1:30	P 8:00				+	1:30	+	8:30	2
	P 1:30	P 8:00				+	1:30	+	8:30	3
	P 1:30	P 8:00				+	1:30	+	8:30	4
	P 1:30	P 8:00				+	1:30	+	8:30	5
Sunday X										6
	P 1:30	P 8:00				+	1:30	+	8:30	7
	P 1:30	P 8:00				+	1:30	+	8:30	8
	P 1:30	P 8:00				+	1:30	+	8:30	9
C. leave						+	1:30	+	8:30	10
	P 11:30	P 8:00				+	11:30	+	8:30	11
		P 8:00				+	1:30	+	8:30	12
Sunday										13
	P 1:30	P 8:00				+	1:30	+	8:30	14
	P 1:30	P 8:00				+	1:30	+	8:30	15
										16
	P 1:30	P 8:00				+	1:30	+	8:30	17
	P 11:30	P 8:00				+	11:30	+	8:30	18
	P 1:30	P 8:00				+	1:30	+	8:30	19
Sunday										20
	P 1:30	P 8:00				+	1:30	+	8:30	21
	P 1:30	P 8:00				+	1:30	+	8:30	22
	P 1:30	P 8:00				+	1:30	+	8:30	23
										24
										25
										26
										27
										28
										29
										30
										31

کلاس اینٹل
PST

C. leave
G.A 1:30 G.
G.A 1:30 G.
G.A 11:30 G.
G.A 1:30 G.
G.A 1:30 G.
G.A 1:30 G.
G.A 11:30 G.
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G.A 1:30 G.
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G.A 1:30 G.
G.A 11:30 G.
G.A 1:30 G.

G.A 1:30 G.
G.A 1:30 G.
G.A 1:30 G.

سابقہ میزان
05
06

		02	01			04	x	اتفاقیہ
								امتحان
								بیاری
								میزان

ATTESTED

Head Mistress
G.G. CMS
Zara Miana (NSR)

دستخط ہیڈ ماسٹر

بابت ماہ فروری 2016ء

رجسٹر حاضری مدرسین

عبدالرشید نائب قاری BUKHARI				3/2/16				مس ظاہرہ اکبر PST				پتہ	کوشن			
آء				آء				آء				آء	روائی			
E.L. & S. NEWSBERA												روائی		کوشن		
			1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
																فریئر ہجران
																G.A 1.30 G
Sunday																
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.30											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
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			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
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			P 1.30	P	8.00											G.A 1.30 G
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			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
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			P 1.30	P	8.00											G.A 1.30 G
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			P 1.30	P	8.00											G.A 1.30 G
			P 1.30	P	8.00											G.A 1.30 G
			P 11.30	P	8.00											G.A 11.30 G
			P 1.30	P	8.00											G.A 1.30 G
Sunday																
			P 1.30	P	8.00											G.A 1.30 G
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	G.A 1.30	G			
	G.A 1.30	G			

حال سابقہ میزان			حال سابقہ میزان			حال سابقہ میزان			حال سابقہ میزان			فرصت
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												01
ATTENDED												01
												01

Farzeelat
Head Mistress
G.G. CMS
Zara Miana (NSR)



B(30)

**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA**

RETIREMENT ORDER.

Under the provision of Government of Khyber Pakhtunkhwa Finance Department letter No.FD (SR-IV) Vol.II, dated 24-08-1983. The competent authority is pleased to grant of sanction to the retirement of the following official as mentioned against his name.

Moreover in pursuance of section 21 of civil servant revised leave rules 1981. Sanction is hereby accorded to the grant of Encashment on full pay in lieu of LPR as admissible to her under the rules:

S#	Name of Official	Date of Birth	Date of 1 st Appointment	Date Retirement	Total Length of Service	LPR for Leave Encashment	Remarks
1	Mr. Abdul Subhan (Ex-Naib Qasid) GGCMS Zara Miana (NSR) P.No. 00137972	✓ 1953	✓ 24-04-1998	✓ 30-06-2013 (A.N)	Y- M- D 15-02-06	365-days	Superannuation

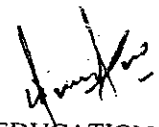
Note: - Necessary entry to this effect should be made in his Service Book accordingly.

(ABIDA PARVEEN)
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

Endst No. 4947.52 /Retirement/DEO (F) NSR, Dated Nowshera the 20/10/2020.

Copy forwarded for information & necessary action to the:-

1. District Accounts Officer, Nowshera.
2. SDEO (F) Nowshera w/r to her later No.4732 dated 05-10-2020.
3. Superintendent Establishment (Local Office).
4. Head Mjstress GGCMS Zara Miana Nowshera.
5. Official Concerned.
6. Office Copy.


DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

ATTESTED

**PENSION ROLL DATA SHEET
NOT A PAYMENT ADVICE**

C (3)

Date of issue : 21.01.2021
 PPO Type : FRESH
 PPO Number : 00137972-01
 Pensioner ID : 00137972
 Pension Register No :
 Pensioner's Name : **ABDUL SUBHAN**
 Father / Husband name : **SHAH SAID**
 Designation : **NAIB QASID**
 NIC No. : 1720163888853
 Grade / Scale : 02
 Department Min : **GOVERNMENT PRIMARY SCHOOL**
 Pensioner's Type : **SELF**
 Pension Type : **SUPERANNUATION**
 Date of Birth : 01.07.1953
 Date of appointment : 24.04.1998
 Date of retirement : 30.06.2013
 Date of Death :
 Date of commence : 01.07.2013
 Date of Restoration :
 Accounts office ID : NR
 Accounts office Name : Nowshera
 Federal / Province : Khyber Pakhtunkhwa
 Length of Qualifying Service : 15 years, 2 months, 6 days
 No. and Date of sanction of pension / Letter No. :
 and the date of the other Audit and Accounts officer authorising
 the Pension/Gratuity/Commutation
 Permanent Address : **MOH QURESH ZARHA MENA
NOWSHERA**

Note : MINIMUM PENSION ARREAR & RECOVERY
 ADJUSTED
 Age : 60 years
 Last Drawn pay/Emoluments(Rs.) : 7450.00
 Gross Pension(Rs.) : **2607.50**
 1/4th Surrendered Portion (Rs.) :
 Commuted Portion (Rs.) : 912.63
 Net Pension (Rs.) : **10000.00**
 Net Family Pension (Rs.) : **0.00**
 Amount of Commutation(Rs.) : **135492.00**
 With Held Amount (Rs.) : 0.00
 Life Time Arrears (Rs.) : 0.00
 Arrears Of Pension (Rs.) : 0.00
 Special Additional Pension (Rs.) : 0.00
 Commutation Percentage : 35.00
 Commutation Table value : 12.37
 Recovery on A/C of
 Debitable to Govt : Khyber Pakhtunkhwa

PROPOSED PENSION SLIP

Payment details

Wage Type	Wage Type Text	Amount
0100	Monthly Pension - Self	10000.00
0101	Pension Increases - Self	1000.00
1599	Medical Allow - Pensioner	750.00
1600	Med. All. 2015 Pensioner	187.50
3950	Recovery: Pension Self	569782.00
5901	Arrears of Pension	791994.00

He/She is also entitled to the following increases

Sr. No.	Period	Increase % on amount	Increase Amount	W.E.F.
1	JUL.2018	Rs. 0.00	0.00	01.07.2018
2	JUL.2015	10.00 %	1000.00	01.01.2021
3	0.	Rs. 0.00	0.00	
4				
5				
6				
7				
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26				
27				

Bank Details

Bank Account Number : 3048311510
 Bank Branch : NOWSHERA CANTT
 NOWSHERA CANTT
 Payment Mode : NATIONAL BANK OF PAKISTAN

ACCOUNTS OFFICER
(Pension)

Document Printed on 21.01.2021 by 894475

ATTESTED



PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

DC38

No. PO/Complaint/953/11/2020/ 223f

Dated: Peshawar the, 12/03/2021

FINAL NOTICE FOR HEARING
FIXED FOR 31/03/2021 AT 11:00 AM

To

1. Secretary,
Elementary & Secondary Education
Department, Civil Secretariat, Khyber
Pakhtunkhwa, Peshawar.
2. Director, Directorate of Elementary &
Secondary Education, Khyber Pakhtunkhwa,
Peshawar.
3. District Education Officer (Female), District
Nowshera.
4. Mr. Abdul Jalil s/o Haji Arif Ullah r/o Mohallah
Qureshi, P/O Akora Khattak Zara Miana District
Nowshera (Cell No. 0341-0077161)

Agency

Complainant

Subject:

**REQUEST FOR RELEASE OF OUTSTANDING SALARIES AND
RETIRED CLASS-IV EMPLOYEE'S CHILDREN QUOTA.**

(Notice under Regulation 12 of the Khyber Pakhtunkhwa Provincial Ombudsman Office
(Registration, Investigation, and Disposal of Complaint) Regulations, 2011).

With reference to this Secretariat Notice dated 07/12/2020, reminder dated 28/12/2020, final reminder dated 18/01/2021 and subsequent Hearing Notice dated 08/02/2021 on the subjected noted above.

Whereas, no record was provided by the Agency even within the extended period as per allegations levelled by the complainant, which has delayed the disposal of complaint. In order to reach just investigation, the case is once again fixed for hearing in the Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa on the date and time mentioned above.

Whereas, as per sub-regulation (3) of Regulation 9 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011 a questionnaire prepared by the undersigned is enclosed herewith for your perusal and reply. The questionnaire should be submitted to the undersigned on or before 31/03/2021.

Whereas, all the parties are asked to put in appearance on the date fixed either in person or through their duly appointed representative's alongwith relevant documents / record as per questionnaire attached. The representative of the Agency should be an Officer not below the rank of BPS-17 who is conversant with facts of the case and should be authorized to record statement before the Investigation Officer.

ATTESTED

[Handwritten signature]



PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

33

Whereas, if the Agency fails to provide relevant record / documents as per questionnaire attached, necessary action under Section 14 read with Section 16 of the Khyber Pakhtunkhwa Provincial Ombudsman Act, 2010 will be initiated.

THIS ISSUES WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN.

Muhammad Kamran Ali
Assistant Director
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa

ATTESTED

E (34)

To

The Worthy Director (Elementary & Secondary Education),
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL FOR GRANT OF
AMOUNT OF WORTH OF RS.569782/-, WHICH WAS
ILLEGALLY DEDUCTED/RECOVERED FROM THE
PENSION THE APPELLANT.**

RESPECTED SIR,

Most humbly it is submitted that:

1. That the appellant is illiterate and was appointed as Naib Qasid on 24.04.1998 in the education department and since his appointment the appellant has performed his duty with great devotion and honesty whatsoever assigned to him.
2. That the appellant was born in the year 1953 and would be retired on 30.06.2013 on attaining the age of superannuation, but the concerned DEO (Female) did not pass an order in respect of retirement of the appellant in time and the appellant being illiterate has continued his duty and regularly performed duty till March 2016 and also received salaries for that period, which is evident from the attendance register of the concerned school.
3. That the District Education Officer (Female) passed an order dated 20.10.2020, whereby the appellant was retired from service on superannuation with effect from 30.06.2013.
4. That the appellant has received his commutation and pension on his retirement, but the period with effect from 1.07.2013 till March 2016 on which the appellant has performed his duty and have received salaries for that period of worth of Rs.569782/- has illegally recovered from the pension of the appellant, which is evident from the pension slip of the appellant.
5. That as the appellant was not retired in time i.e 30.06.2013 and has continuously and regularly performed duty till March 2016 and have received salaries for that period of worth of Rs.569782/- which was

DAC (Admin)
2/4/20

[Scribbled signature]

269

7-4-20

ATTESTED

illegally recovered from the pension, therefore the appellant wants to file departmental appeal for grant of that recovered amount of worth of Rs. 569782/- on the following grounds.

GROUND:

- A) That recovery of Rs.569782/- from the pension of the appellant is against facts, norms of justice and material on record, therefore, not tenable and the recovered amount of worth of Rs.569782/- may kindly be granted to the appellant.
- B) That the appellant was born in the year 1953 and would be retired on 30.06.2013 on attaining the age of superannuation, but the concerned DEO (Female) did not pass an order in respect of retirement of the appellant in time and the appellant being illiterate has continued his duty and regularly performed duty till March 2016 and also received salaries for that period, therefore the appellant could not be punished for the fault of the other in shape of recovery for the period on which he has performed his duty.
- C) That the appellant was born in the year 1953 and would be retired on 30.06.2013 on attaining the age of superannuation, but the retirement order of the appellant was passed on 20.10.2020 and the appellant being illiterate has continued his duty and performed that duty till March 2016, therefore, it was the responsibility of the concerned official to pass the order of retirement of the appellant in time and not allowed him to perform after his superannuation and now recovery of worth of Rs.569782/- from the pension for the period on which he has performed his duty is against the norms of justice and fair play being a low paid employee.
- D) That the appellant has regularly performed duty with effect from 01.07.2013 till March 2016, which is evident from the attendance register of the school and recovery of Rs.569782/- from the pension of the appellant amount to force labour, which is violation of Article-11 of Constitution of Islamic Republic of Pakistan, 1973.
- E) That the appellant being a low paid employee (Class-IV) and recovery of Rs.569782/- from his pension on the fault of the others has badly affected his financial position.

ATTESTED

(36)

It is, therefore, most humbly requested that on the acceptance of the departmental appeal, the amount of Rs.569782/- which has been illegally recovered/deducted from the pension of the appellant for the period on which he has performed his duty may kindly be granted to him as being low paid employee.

Abdul Subhan

APPELLANT

Abdul Subhan (Retired- Naib Qasid)
GGCMS Zara Miana, Nowshera.

Cell No. 0341-0077161

Dated: 07/04/2021

ATTESTED



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 5280 /F.No. PF/A-20/C-IV/abdul Subhan Nowshera

Dated Peshawar the 19-4- /2020

Phone: 091-9225344

Email: ddadmn.es@gmail.com

To

The District Education Officer
(Female) Nowshera

Subject:

DEPARTMENTAL APPEAL FOR THE GRANT OF AMOUNT WORTH OF
RS.569782/-, WHICH WAS ILLEGALLY DEDUCTED / RECOVERED FROM THE
PENSION THE APPELLANT

Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of appeal lodged by Mr. Abudl Subhan retired N/Qasid GGCMS Zara Miana Nowshera.

You are therefore directed to submit detailed report/comments at an early date.

Assistant Director (Admn)
Directorate of E&SE K.P, Peshawar

Endst; No. 5281

Copy forwarded to the: -

1. Mr. Abudl Subhan retired N/Qasid GGCMS Zara Miana Nowshera
2. PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. M/File

Assistant Director (Admn)
Directorate of E&SE K.P, Peshawar

ATTESTED

VAKALAT NAMA

NO. _____/20

IN THE COURT OF KP Service Tribunal, Peshawar

Abdul Subhan

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Secretary (E&SE) & Others

(Respondent)
(Defendant)

I/We, Abdul Subhan

Do hereby appoint and constitute **Taimur Ali Khan, Advocate High Court 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 costs.

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. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

عبدل سبحان

(CLIENT)

ACCEPTED

Taimur Ali Khan

TAIMUR ALI KHAN
Advocate High Court
BC-10-4240

CNIC: 17101-7395544-5
Cell No. 0333-9390916

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar

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

Service Appeal No. 7122/2021

Abdul Subhan.....Appellant.

Versus

The Secretary (E & SE) KPK and others.....Respondents.

INDEX

S.N No.	Description of Documents	Date	Annexure	Pages
1.	Para wise Comments			01-04
2.	Affidavit			05
3.				


Deponent

1

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

Service Appeal No. 7122/2021

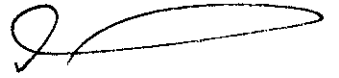
Abdul Subhan... ..Appellant.

Versus

The Secretary (E & SE) KPK and others... ..Respondents.

**PARA WISE COMMENTS ON BEHALF OF
RESPONDENT NO. 1 TO 3.**

Preliminary Objections:-



- i. That appellant has no cause of action and locus standi.
- ii. That appellant has not come to the court with clean hands and suppressed material facts from the notice of this Honorable Tribunal. Appellant was aware of his age. The CNIC was in the possession of the appellant from which the age of the appellant could be easily calculated. The date of birth as per CNIC of the appellant is 30-06-1953 and as such he has attained his 60th year on 30-06-2013. Appellant being an educated person and more so an employee of education department, how it be presumed that he was not aware of his date of birth and 60th anniversary. Appellant caused lost his service book intentionally therefore, respondent could not trace his service record in due course of time. After attaining the age of 60 years / superannuation, the appellant has lost his service book, as result thereof, now service book of the appellant was produced by respondents. It is also worth mentioning that one copy of service book is usually in possession of every employee. Appellant concealed this fact intentionally and malafidely and as such received his salaries illegally. Since the receipt of salaries from 30-06-2013 to march, 2016 were received with malafide intention therefore, the same have been recovered through the impugned notification.
- iii. That the appeal is not maintainable.

- iv. That the principle of estoppels lies against the appellant.
- v. That appeal is hit by principle of limitations.
- vi. Appellant has not availed departmental remedy in shape departmental appeal therefore the instant appeal is not maintainable.
- vii. That appellant is not an aggrieved person within the meaning of section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

Reply to Facts:-

1. That Para No.1 is incorrect, hence denied. Appellant cannot be presumed to be an illiterate person being an employee of education department as well on the score of service record and service career. The plea of the appellant that he has served the department with great devotion and honesty is also devoid of merits for the reason that he managed his service book loss and entry in his CNIC regarding his date of birth and obtained ill gotten salaries in lieu thereof. It is imperative to mention here that under the provisions of the Section 13 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, an employee as automatically retire on attaining the age of superannuation.
2. That Para No 2 is incorrect, hence denied. Appellant automatically got retired on attaining age of superannuation. The detail answer has already been submitted.
3. That Para No.3 is incorrect, hence denied. The impugned order dated 20-10-2020, the respondent department is legally competent in as liable to be mentioned on the ground that the service of the appellant after attaining the age of superannuation was not required to the respondent department in the terms of Section 13 of Khyber Pakhtunkhwa Civil Servants Act, 1973.

4. That Para No.4 is incorrect, hence denied. Since the salaries were received by the appellant malafidely as explained ibid, therefore, proper deduction was made from the pension of the appellant by respondent No.4.
5. That Para No.5 is incorrect, hence denied. Appellant has approached Provincial Ombudsman, which is against the provision of Article 212 (2) of the Constitution of Pakistan, 1973. and as such the principle of constructive res judicate can validly apply against the appellant.
6. That Para No.6 of the appeal is incorrect, hence denied. Since appellant has received his salaries with malfide intention, therefore proper deduction was made from his commutation. An employee automatically got retired on attaining the age of 60th years. Appellant has not filed any departmental appeal before the competent authority and has approached this Hon'ble Tribunal without availing departmental remedy. On this score the instant appeal is liable to dismissed.
7. That Para No.7 of the appeal is incorrect, hence denied. Appellant is not an aggrieved person within the meaning of section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

Reply to Grounds.

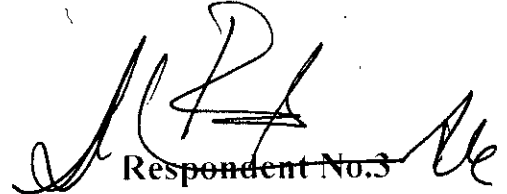
- A. That Ground "A" of the appeal is incorrect, hence denied. Appellant has been treated in accordance with law, rules and policy on the subject. Recovery has rightly been made by respondent No.4.
- B. That Ground "B" of the appeal is incorrect, hence denied. Appellant was aware of his age. The CNIC was in the possession of the appellant from which the age of the appellant could be

easily calculated. The date of birth as per CNIC of the appellant is 30-06-1953 and as such he has attained his 60th year on 30-06-2013. Appellant being an educated person and more so an employee of education department, how it be presumed that he was not aware of his date of birth and 60th anniversary. Appellant caused lost his service book intentionally, therefore, respondent could not trace his service record in due course of time. When missing of service book was noticed; the same was re-constructed and appellant was got retired. It is also worth mentioning that one copy of service book is usually in possession of every employee. Appellant concealed this fact intentionally and malafidely and as such received his salaries illegally. Since the receipt of salaries from 30-06-2013 to march, 2016 were received with malafide intention therefore, the same have been recovered through the impugned notification.

- C. That Ground "C" of the appeal is incorrect, hence denied. The detail answer has already been submitted.
- D. That Ground "D" of the appeal is incorrect, hence denied. Appellant received his salaries malafidely for which he was not legally entitled. An employee shall be retired automatically on attaining the age of superannuation as per provision of section 13 of the Khyber Pakhtunkhwa Civil Servant Act, 1973.
- E. That Ground "E" of the appeal is incorrect, hence denied. The answering respondents has followed the law, rules and policy on the subject and no violation of rule was made.
- F. That ground "F" of the appeal is incorrect, hence denied. The detail answer has been submitted by the answering respondent. Appellant has not been discriminated.

- G. That answering respondent would also like to seek the permission of the this Honourable Tribunal to share grounds in rebuttal.

It is therefore, humbly prayed that on acceptance of this parawise reply, this Hon'ble Tribunal may be pleased to dismiss the appeal with cost.



Respondent No.3

The Secretary (E & SE)

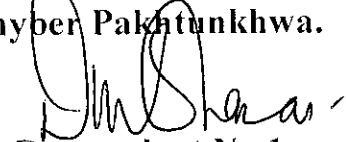
Govt: of Khyber Pakhtunkhwa.



Respondent No.2

The Director

Govt: of Khyber Pakhtunkhwa.



Respondent No.1

DEO (E & SE), (F)

Nowshera.

Dated: ___/___/2021

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

Service Appeal No. 7574/2021

Tahir Ali ShahAppellant.

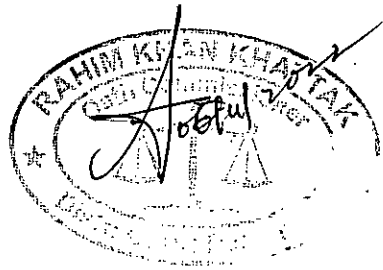
Versus

The District Education Officer (F) and othersRespondents.

AFFIDAVIT

I, Roheen ADO Legal (E & SE) department Nowshera, do hereby solemnly affirm and declare on oath that the contents of this Parawise Comments/Reply are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

ATTESTED



[Signature]

Deponent