

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 635/2018

Date of Institution ... 12.04.2018

Date of Decision ... 02.02.2022

Rauf Niaz S/O Mir Muhammad Ayaz R/o Basia Khel Tehsil and District Bannu.
... (Appellant)

VERSUS

Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
and others. ... (Respondents)

Umar Nasir,
Advocate ... For Appellant

Muhammad Adeel Butt,
Additional Advocate General ... For respondents

AHMAD SULTAN TAREEN ... **CHAIRMAN**
ATIQ-UR-REHMAN WAZIR ... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):-

Brief facts of the

case are that the appellant was appointed as SET on 12-04-1979 and retired from service on 04-06-2009 as SET Teacher. The appellant submitted departmental appeal dated 15-02-2017 to the respondent No. 5 to the effect that the appellant may be granted annual increments, but the same was rejected vide order dated 25-07-2017. The appellant inadvertently filed a suit No 469/1 in the court of civil judge bannu, but the learned court vide judgment dated 31-01-2018 returned the plaint to the appellant with permission to approach the proper forum, hence the instant service appeal with prayers that the impugned order dated 25-07-2017 may be set aside and the appellant may be granted annual increments with effect from 14-04-1979.

02. Learned counsel for the appellant has contended that the impugned order is against law, facts and norms of natural justice, therefore not tenable and liable to be set aside; that as per judgment of supreme court of Pakistan, all those un-trained teachers, who were appointed on fix pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears; that the above benefit was also admissible to all those retired teachers who fulfill the above condition, therefore the appellant is entitled for annual increments with effect from 14-04-1979; that in light of letter dated 30-10-2009 issued by Finance Department, the appellant being eligible for annual increment, therefore is entitled for the same.

03. Learned Additional Advocate General for the respondents has contended that the appellant was appointed as SET Teacher un-trained on 12-04-1979 and was terminated vide order dated 01-01-1983; that the appellant was again appointed as SV Teacher on fixed pay un-trained vide order dated 25-01-1983 and again terminated vide order dated 08-05-1983; that the appellant was again appointed as SV Teacher vide order dated 08-11-1983 and he resigned from service on 21-04-1984; that the appellant was again appointed as CT Teacher vide order dated 20-08-1985 and the appellant served against the post until 30-08-1988; that the appellant was again appointed as SET Agriculture on the basis of vocational teacher training passed on 22-08-1988 vide order dated 31-08-1988; that the official was regularized against the post of SET agriculture with effect from 01-09-1988 vide order dated 01-07-1998 and served until his retirement; that the appellant did not serve regularly with effect from 12-04-1978, rather he was regularly appointed against the post of SET with effect from 01-09-1988 and all the pension benefits were given to him as per rule with effect from 01-09-1988; that finance department letter dated 30-10-2009 under the direction

ORDER

02.02.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondent present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the present service appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

02.02.2022



(AHMAD SULTAN TAREEN)
CHAIRMAN



(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

2/2/2022 DB. Posh (T)

Disputed order 23/11/2020
(treated leave without pay)

D.A.

8/12/2020

20/12/2020

Rejected

suspended 13/7/2020

Accepted to the extent if
he was entitled

03.06.2021

Appellant in person present.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Attention of the learned A.A.G has been drawn to the comments and he himself referred to letter dated 25.07.2017 annexed with the comments. The said letter contains the service history of the appellant. It is there in the said letter that the appellant as per office record, he had resigned from service w.e.f 21.04.1984 which was accepted vide letter dated 14.04.1984, thereafter, the appellant was appointed on S.V post where he served up to 30.08.1985. Thereafter, the appointment of the appellant was made on C.T post which in terms of the dates seems to be in continuation of the service on S.V Post. Again the appointment of the appellant against S.E.T post in the year 1988 seems to be in continuation of his service on C.T post. Apparently, there appears no break in the period of service of the appellant after his appointment on S.T post in the year 1983. The learned A.A.G contends that the benefits of untrained service are admissible when the Teacher concerned have been trained on the same post. However, the comments as filed by the respondents have not been fortified by any tenable evidence of rules or policy which fully support the contention of the learned A.A.G. He has requested to contact the department. To come up on 16.07.2021 before D.B.


(Rozina Rehman)
Member (J)


Chairman

28.9.21

DB is on Tour case to come up
For the same on Dated 2-2-22


Reader

25 .02.2021

Due to Pandemic of Covid-19, the case is adjourned to
03.06.2021 for the same.


Reader

20.08.2020

Due to summer vacation, the case is adjourned to 22.10.2020 before D.B.



Reader

22.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned to 18.12.2020 for hearing before the D.B.



(Mian Muhammad)
Member

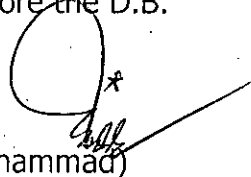


Chairman

18.12.2020

Counsel for the appellant and Mr. Muhammad Jan, DDA for the respondents present.

Former requests for adjournment in order to further prepare the brief. Adjourned to 25.02.2021 for arguments before the D.B.



(Mian Muhammad)
Member(E)



Chairman

15.01.2020 Appellant absent. Learned counsel for the appellant absent. Due to general strike of the Bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for arguments on 24.03.2020 before D.B. Appellant be put to notice for the date fixed.



Member


Member

25.03.2020 Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 09.06.2020 before D.B.


Reader

09.06.2020 Bench is incomplete as one learned Member (J) is on leave. Therefore, the case is adjourned. To come up for the same on 20.08.2020 before D.B.


Reader

19.07.2019

Junior counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Zakiullah, Senior Auditor for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel is not available today. Adjourned to 07.10.2019 for arguments before D.B.


(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

7-10-2019

Due to tour of Honble
Member to court
The case is adjourned to
16-12-2019


Member

16.12.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 15.01.2020 before D.B.

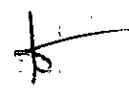

Member


Member

18.02.2019 Learned counsel for the appellant present. Written reply of respondents No.2 & 5 is still awaited. No one present on behalf of respondents No.2 & 5. Notice be issued to them with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondents No.2 & 5 on 04.04.2019 before S.B.


Member

04.04.2019 Appellant in person and Addl: AG alongwith Mr. Zakiullah, Senior Auditor and Mr. Muhabbat Khan, Asst: Account Officer for respondents. Due to general strike of the bar the case is adjourned. Case to come up for further proceedings on 07.05.2019 before S.B.


(Ahmad Hassan)
Member

07.05.2019 Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Mahabat Khan, Assistant Account Officer for respondents No. 2 & 5 present and submitted written reply. Written reply on behalf of respondents No. 1, 3 & 4 already submitted. Adjourned to 19.07.2019 for rejoinder and arguments before D.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

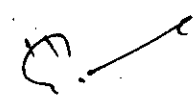
07.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 21.12.2018. Written reply not received.


READER

21.12.2018

Learned counsel for the appellant present. Mr. Hayat AD representative of the respondents present and seeks time to furnish written reply. Granted. To come up for written reply/comments on 29.01.2019 before S.B.


Member

29.01.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Hayat Khan, Assistant Director for respondents No. 1, 3 & 4 present and submitted written reply on their behalf. None present on behalf of respondents No. 2 & 5 therefore, notice be issued to them with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on behalf of respondents No. 2 & 5 on 18.02.2019 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

13.07.2018

None present on behalf of the appellant. Adjourned.
To come up for preliminary hearing on 16.08.2018 before
S.B.


(Muhammad Amin Kundi)
Member

16.08.2018

Mr. Hayat Ullah, Advocate put appearance on behalf
of counsel for the appellant and made a request for
adjournment. Granted. Case to come up for preliminary
hearing on 25.09.2018 before S.B.


Chairman

25.09.2018

Appellant Rauf Niaz alongwith his counsel Mr.
Umar Nasir, Advocate present and heard.

Contends that the appellant was entitled to annual
increments on the basis of notification dated 30.10.2009
of the Finance Department but even then the same was
not granted to the appellant.

Points raised need consideration. The appeal is
admitted to full hearing, subject to all legal objections, if
raised by the respondents. The appellant is directed to
deposit security and process fee within 10 days.
Thereafter, notices be issued to the respondents. To
come up for written reply/comments on 07.11.2018
before S.B.

Appellant Deposited
Security & Process Fee




Chairman

Form-A
FORM OF ORDERSHEET

Court of _____
Case No. 635/2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	11/05/2018	<p>The appeal of Mr. Rauf Niaz resubmitted today by Mr. Umar Nasir 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;"><i>[Signature]</i> REGISTRAR 11/5/18</p>
2-	15/05/18	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>29/05/18</u>.</p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
	29.05.2018	<p>Counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 13.07.2018 before S.B.</p> <p style="text-align: right;"><i>[Signature]</i> (Ahmad Hassan) Member</p>

The appeal of Mr. Rauf Niaz son of Mir Muhammad Ayaz Teshil and Distt. Bannu received today by i.e. on 12.04.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is not mentioned.
- 2- Memorandum of appeal of appeal may be got signed by the appellant.
- 3- Annexures of the appeal may be flagged.
- ④ Copy of departmental appeal is not attached with the appeal which may be placed on it.
- ⑤ Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may be also be submitted with the appeal.

No. 814 /S.T,

Dt. 17/04 /2018



REGISTRAR 17/4/18
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Umar Niaz Adv Pesh.

R. Sir


Resubmitted after removal of
objection # 1 to 3.

30/4/18



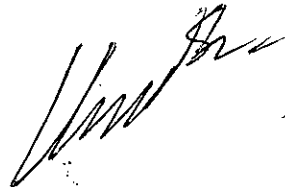
objection No. 4 & 5 are still stand.

Return again a re-submit within ⑩ days.


3/5/18

Sir

Resubmitted after removal of
objection no 4 & 5.



BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

A. No. 635/18

Rauf Niaz VERSUS Secretary Elementary & Secondary Education etc

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6	Wakalat Nama		17

Appellant Rauf Niaz
Through,

Umar Nasir,

M. Hayat Khan

M. Tahir

Advocates High Court Peshawar.

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

A-No. 635/18

Rauf Niaz S/o Mir Muhammad Ayaz R/o Basia Khel Tehsil and District Bannu.
Appellant

Khyber Pakhtunkhwa
Service Tribunal

Case No. 542

Dated 12-4-2018

VERSUS

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. Accountant General Government of Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male) District Bannu.
5. District Account Officer District Bannu.

Respondents

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDER PASSED BY RESPONDENT NO.5,
TO THE EFFECT THAT THE ORDER DATED 25/07/2017
MAY KINDLY BE DECLARED AS NULL AND VOID
UPON THE RIGHTS OF THE APPELLANT.**

PRAYER

**ON ACCEPTANCE OF THIS APPEAL THE ORDER
PASSED BY RESPONDENT NO.5, MAY KINDLY BE SET
ASIDE AND THE APPELLANT MAY KINDLY BE
GRANTED ANNUAL INCREMENTS WITH EFFECT FROM
14/04/1979.**

Respectfully submitted.

Filed to-day the appellant submit as under:-

Registrar
12/4/18

Resubmitted to-day
and filed.

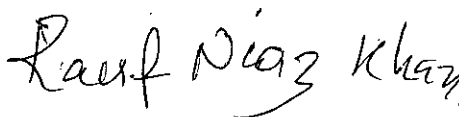

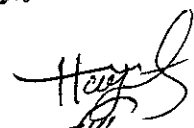
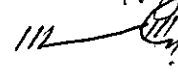
1. That the appellant was appointed against SET post on 12/04/1979 and was retired on 04/06/2009 as SET Teacher, therefore the appellant served the respondent for about 30 years.
2. That the appellant submitted a departmental appeal / representation on 15/02/2017 to the respondent No.5 to the effect that the petitioner be granted annual increments but the same was refused on 25/07/2017.
3. That the appellant inadvertently filed a suit No.469/1 in the court of Learned Civil Judge Banu, but the Learned Civil Judge vide order / judgment dated 31/01/2018 returned the plaint to the appellant with the permission to approach the proper forum, hence this appeal on the following grounds inter-alia.

Registrar
15/1/19

GROUNDS:

- I. That the order dated 25/07/2017 passed by the respondent No.5 is against the Law, fact and circumstances of the case. Hence not tenable in the eyes of law.
- II. That the appellant was illegally and unlawfully was terminated but after hearing the appellant, order of termination of the appellant was withdrawn by the respondents and the service of the appellant was restored vide order dated 02/01/1986 by D.D.E (S) D.I Khan Division.
- III. That as per the decision of the August Supreme Court of Pakistan.
 - a. All those untrained teachers who were appointed on fix pay and were subsequently regularized against their post, on acquiring / completing requisite training successfully/ would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.
 - b. That the above benefit would also be admissible to all those retired teachers who fulfill the above condition therefore the appellant is entitle for annual increment with effect from 14/04/1979. In the light of letter No. F.D (PRC) 5-2/2002 dated 30/10/2009 issued by finance department. That the appellant being eligible for annual increment therefore is entitle for the same.
- IV. That any other ground which has not been specifically mentioned in the memo of this appeal will be agitated at the time of arguments with the permission of this Honourable Tribunal.

It is, therefore, most graciously prayed that on acceptance of this appeal the order dated 25/07/2017 may kindly be set aside and the appellant be granted annual increments with effect from 14/07/1979 till date.

Appellant Rauf Niaz
 Through,  Rauf Niaz Khan
 Umar Nasir, 
 M. Hayat Khan 
 M. Tahir 
 Advocates High Court Peshawar.

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.

Rauf Niaz VERSUS Secretary Elementary & Secondary Education etc

APPLICATION FOR CONDONATION OF DELAY U/S 5 OF THE LIMITATION ACT

Respectfully sheweith:-

That the petitioner / appellant submits as under:-

1. That the petitioner / appellant filing the accompanying appeal before this Honourable Tribunal, which is time barred.
2. That non filing of the appeal within time because in avertedly the petitioner / appellant filed a suit in the court of Civil Judge Banuu, which was returned to the petitioner / appellant with the permission to approach proper form.
3. That non filing of appeal within time was deliberate nor intentional but was due to the reason mentioned above.
4. That there is no legal bar in condonation of delay.

It is therefore most graciously on acceptance of this condonation application the period elapsed may kindly be condone in the interest of justice.

Appellant Rauf Niaz

Rauf Niaz Khan

Through,

Umar Nasir *[Signature]*

M. Hayat Khan *[Signature]*

M. Tahir *[Signature]*

Advocates High Court Peshawar.

OFFICE OF THE DIVL: DIRECTOR OF EDUCATION (SCHOOLS) D.I. KHAN DIVN:

ORDER.

Orders of termination of services issued under this office No.9 dated, 1-1-1983, No.6672/AE-VII/FA-SV dated 8-5-83 and that of acceptance of resignation issued under No:6519-23/AE-VII/1-A dated 14-4-1984 in respect of Mr. Rauf Niaz BSc Agr: now working at Govt: High School Lallozai (Bannu) are hereby withdrawn and he is granted extra ordinary leave without pay for the following periods:-

- 1. 1-1-83 to 26-1-83 = 0-0-26 days ✓
- 2. 15-5-83 to 15-11-83 = 0-6-1 days ✓
- 3. 21-4-84 to 30-8-85 = 1-4-10 days ✓

Total = 1-11-7

NOTE.

Necessary entry to this effect should be made in his Service Book.

(FAZAL UR REHMAN KHAN)
DIVL: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVN: DIKHAN.

Endst: No. 102-5 / Dated DIKHAN the 2 / 1/1986.

Copy forwarded for information and necessary action to the:-

- 1- District Education Officer (Male) Bannu.
- 2- Head Master Govt: High School Lallozai with reference to his Endst: No. 180/A-2/Orig: dated 17-12-1985.
- 3- Personal file.
- 4- District Accounts Officer Bannu.

DIVL: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVN: DIKHAN.

HB

ATTESTED
Copying Agency
Lower Court Bannu
21-2-86

14-4-79 to 3-9-81
5-9-81 to 22-5-82
23-5-82 to 30-10-82
31-10-82 to 31-12-82

2 (5)

To,
18

The DISTRICT ACCOUNTS OFFICER
Bannu.

R/Sir,

It is submitted in terms of
Finance Dept Govt of KPK
Peshawar Notification NO FD (PRC)
5-2/2002 DT-30-11-2009.

I am eligible for the grant of
annual increments after regulariza-
tion of my fixed pay service.

It is therefore requested that
my fixed pay service w.e.f 14-4-1979
may be counted for the grant of
annual increment by excluding
non-qualifying service.

ATTESTED

Yours Obedient

Copying Agency
Lower Court Bannu
21-2-18

Rauf Miraj Khan
EX-S.E.T.
Govt. High School
S.K. Balal
Bannu.

Plz provide behind
file and other
records.

Retired from
Service w.e.f. 2009.
AKO PA-II
15/11

Dated

15-2-017

Check his pay from the
photo copy of Service
Book.
11/3



19
16
RECEIVED
Chief Accounts Officer
Bannu

**OFFICE OF THE
DISTRICT ACCOUNTS OFFICER
BANNU**

FAX/PHONE NOs 0928-9270030 & 68

No.DAO/BU/Admn-II /2017-18/

Dated: 25/07/2017

To

Mr, Rauf Niaz ,
Ex.SET at GHS S.K BALA,
BANNU.

Subject: UNTRAINED SERVICE INCREMENTS ON SET POST WEF 14.04.1979.

Memo:

Kindly refer to your application Dated 21.03.2017 for grant of annual increments of untrained service on SET post wef 14.04.1979.

As per the record the applicant has resigned from service wef 21.04.1984 vide letter NO:6519-23/AE VIII/A Dated 14.04.1984.

- 1) Meanwhile the applicant has been appointed as SV post dated: 25.01.1983 up to 30.08.1985.
- 2) The applicant again appointed on CT post vide letter No: 12439-43/C-3/Corrsp/SET/BU Dated 20.08.1985 up to 31.08.1988.
- 3) On 31.08.1988 the applicant once again appointed against SET (Agri) Post vide E/NO:1622-28/AE-III/625 Dated 31.08.1988.

The benefits of untrained service are admissible only when the teacher concerned have been trained on the same post.

Rauf Niaz
DISTRICT ACCOUNTS OFFICER
BANNU

Ji

ATTESTED

62
Copying Agency
Lower Court Bannu
21-2-18

(17)

لیدارت فیڈ - 12 آر جی بونا

راؤف نیاز صاحب کمرنگ 10 بجو کٹی ونگ

شہن و شہانہ



GOVERNMENT OF N.W.F.P
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD (PRC) 5-2 /2002
Dated Peshawar the: 30-10-2009

508
18/12

To:

The Secretary to Govt. of NWFP,
Elementary & Secondary Education Department,
Peshawar.

Subject:

GRANT OF ANNUAL INCREMENT / RUNNING PAY TO
UNTRAINED TEACHERS IN THE LIGHT OF SUPREME
COURT JUDGMENT.

Dear Sir,

I am directed to refer to this Department letter No.FD (PRC) 5-2/2002, dated 30-03-2009 on the subject noted above and to say that certain quarters have raised some queries about the subject matter which are clarified as under:-

- i. All those untrained teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring / completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.
- ii. The above benefit would also be admissible to all those retired teachers who fulfil the above conditions.
- iii. The above benefit would not be admissible to those who themselves resigned, or were removed / terminated from service.

2. This Department letter of even number dated 30-03-2009 shall be deemed to have been modified to the above extent.

Yours Faithfully,

(SHAUKAT ULLAH)
SECTION OFFICER (SR-1)

Endst: of even No. & date.

Copy for information and necessary action:-

1. Accountant General, NWFP.
2. All District Coordination Officers, NWFP.
3. All District / Agency Accounts Officers, NWFP / FATA.

ATTESTED

Copying Agency
Lower Court Bannu
21-2-08

SECTION OFFICER (SR-1)

لا اناض - 2017-18-30

برقده 469/1، 26-10-17، 31-1-18

ORDER SHEET
راؤف نیاز، بیگم سکرٹری ایجوکیشن و سوشل ورک


(8)

Court of: Wajid Ali, Senior Civil Judge, Bannu. Page _____

Case Title: 508/18 of _____

No. and Date Order of the Proceeding with signature of Judge or Magistrate and that of parties or counsel where necessary.

Order # 01: Suit submitted through counsel. Be entrusted to the Court of learned Civil Judge Wajid Ali, Bannu.


WAJID ALI
Senior Civil Judge, Bannu

Order # 02: Put up after scrutiny.
26.10.2017

Hafeez Ullah,
Civil Judge-XII, Bannu

Respected Sir,

Plaint, affidavit, correct address, list of LR's, list of documents along with relevant record etc, wakalatnama 3 شہزاد + مسٹر شاہ ادریس, copy of plaint and summons forms are attached.

Reader. mi

Order # 03:
26.10.2017

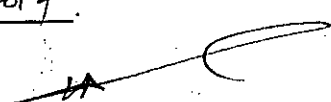
The suit file received from learned SCJ, Bannu. Plaintiff along with counsel present, who admits the contents of plaint as true & correct.

~~11/20/17~~ Be registered.

Notice of the same be issued to the defendants/respondents.

File to come up for attendance on 20.11.2017.

ATTESTED
Copying Agency
Lower Court Bannu
21-2-18


Hafeez Ullah,
Civil Judge-XII, Bannu

19

3

ORDER SHEET

Court of _____ Page _____

Case title _____ of _____

No. and date	Order of the proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary.
--------------	--

0-4
20/11/17

Plaintiff along with counsel present. Representatives for Defect-5 present and an authority further presented. Defect no-4 is not in attendance despite of his service therefore, he is processed ex parte. Defect no-1 to 3 are residing at Peshawar therefore, Plaintiff is directed to submit Registry + AD Cards today to which he presented. Defect no-1 to 3 to be served through Registry for 8/12/17.

HAJEEZ ULLAH
Civil Judge-XII
Bannu

R-N
8/12/2017

presence in before. the P.O. is 24
+ Pakistan - therefore, the case is posted
to 5/01/2018. AP

ATTESTED

Copying Agency
Lower Court Bannu
21-2-18

0-5 Counsel along with Plaintiff present.

5/1/2018 Representative for deft no-2 and 5 present and submitted w/ Statement, while an authority letter handed over back with the direction to re-submit after proper verification. Process issued to deft 1 and 3, AD costs did not return. Meanwhile, Counsel for Plaintiff submitted an application for issuing Publication against the deft no-1 and 3, Allowed, and directed to deposit Publication within 3 days, and thereafter, Publication be issued to deft no-1 and 3. To come up for attendance

ON 23 01
18

ATTESTED
MAFEEZ ULLAH
Civil Judge-XII
Bannu
Copying Agency
Lower Court Bannu
21-2-18

0-6
23/1/18 Plaintiff in person present.
Rep of def NO 2 & 5 present. Process returned
issued to def 1 & 3. GP, Dames to return.
File to come up on 30/1/18 for agreement
a maintainability of suit.

MAFEEZ ULLAH
Civil Judge-XII
Bannu

(10)

ORDER SHEET

Court of

Page

Case title

Of

No. and date	Order of the proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary.
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0-7
30/1/18

Plaintiff is present along with counsel present. None present for def 1, 2, 3 and 4. Representative of def no 4 be notified. Rep of def 2 and 5 present. Counsel of plaintiff completed arguments. File to come up on 3/1/18 for order on maintainability.

[Signature]
[Signature]

ATTESTED

[Signature]
 Copying Agency
 Lower Court Bannu
 21-2-08

(11)

IN THE COURT OF HAFEEZ ULLAH,
CIVIL JUDGE XII, BANNU.

Civil Suit No.468/1 of 2017

Rauf Niaz

VS

Secretary Elementary & Secondary
Education KPK Peshawar & others

Order # 08:

31/01/2018

1. Plaintiff along with Counsel present. Defendants through representative and GP, Bannu present.

2. My this order is aimed to dispose of the matter of maintainability of instant suit.

3. Brief facts of the case are that plaintiff has filed suit for declaration cum injunction to the effect that plaintiff has been retired from Education Department, Government of Khyber Pakhtunkhwa on 04/06/2009. That Finance department issued notification bearing No. FD (PRC) 5-2/2002 dated 30/10/2009 whereby untrained teachers were sanctioned with grant of annual increment/ running pay. That plaintiff being entitled to the above mentioned increment applied to the defendants for awarding increment from his date of appointment till retirement as per above mentioned letter but defendants refused to award increment to the plaintiff, hence the instant suit.

4. Defendants were summoned.

5. On 23/01/2018, Court placed the instant suit for maintainability of the suit.

6. Arguments heard on point of maintainability were heard on 30/01/2018.

7. Perusal of record reveals that the plaintiff is retired Civil Servant who served in Department of Education, Khyber Pakhtunkhwa since 2009.

Perusal of plaint divulges that the plaintiff has brought suit for

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Copying Agency
Lower Court Bannu
21-2-18

6

12

declaration and injunction regarding his outstanding increments (which were allegedly sanctioned as per notification No.FD (PRC) 5-2/2002 dated 30/10/2009).

8. Chapter II of Civil Servants Act, 1973 defines terms and conditions of Civil Servants. Sec. 17 of Khyber Pakhtunkhwa Civil Servants Act, 1973 defines Pay which is included in the terms and conditions of Civil Servants Act, 1973. Similarly, Sec.23 (B), of ibid Act read with Sec.3 and 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 and Art.212 of Constitution of Pakistan, 1973 bars the Jurisdiction of Civil Court in the matters pertaining to terms and conditions of Civil Servants. As increments of Civil Servants are part and parcel of pay hence, it comes under the terms and condition of civil servants, therefore, this Court has no jurisdiction to proceed with the instant suit which is regarding increments of plaintiff who served as SET/ Civil Servant from 1979 to 2009. Hence, the plaint of plaintiff is hereby returned to the plaintiff with permission to file suit before proper forum, if so desire.

9. No order as to cost. File be consigned to record room after necessary completion and compilation. The original plaint along with documents be returned to plaintiff while copies of plaint and documents shall be placed on file.

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Copying Agency
Lower Court Bannu
21-2-18

Announced: Bannu
Dated: 31.01.2018

1- Registration No. 1104
 2- Date of Presentation of Application 2-2-18
 3- Date of Receipt of the file 21-2-18
 4- Date of Preparation of copy 21-2-18
 5- Date of Delivery of copy 21-2-18
 6- No. of copies / words 6
 7- Ordinary Fee 12
 8- Urgent Fee
 9- Total Fee 12
 10- Signature of copyist

(Hafeez Ullah)
Civil Judge-XII
Bannu

7

(13)

عدالت صاحب سند عدالت جج صاحب مقام میں

روف نیاز اولہ صدیہ محمد آغا نیاز سند صدیہ ضیل قنیل و صف میں — دعوی

نام

Order #
Senior Civil Judge
Barnu
26 OCT 2017

1) سند شری ایگمنڈی اینڈ سٹینڈری ایجوکیشن صورت صدیہ فقیر خواہ شماره

2) اگا ڈسٹریکٹ صدیہ طرف صدیہ فقیر خواہ شماره

3) ڈائریکٹری ایگمنڈی اینڈ سٹینڈری ایجوکیشن صورت KP شماره

4) ڈسٹریکٹ ایجوکیشن آفسر درانہ میں

5) ڈسٹریکٹ اگاریٹ آفسر میں

دریافت

9- دعویٰ ملنے ڈسٹری ایگمنڈری میں عدالت جج صاحب مقام عدالت SET میں

دورہ 14/4/1979 Appoint مرصفا ہے اور کم دعویٰ نشین یافتہ ہے

اور دعویٰ بحال مشرک FD(PRC) 5-2/2002 دورہ 30/10/2009

مبنیاً ڈیپارٹمنٹ Annual Increment/Running pay از تاریخ

Appoint دورہ 14/4/79 بحال ادراشہ اسٹڈیہ کا صدیہ ہے صدیہ

صدیہ دریا جاری ہے جو کہ اس بات میں سے دریا ہے کہ ڈسٹری

دورہ 15/2/017 تزاریں صدیہ کا دوران میں ہے اور کارہ ہے

نے بحال مشرک DAO/BU/Admn-II/2017-18 دورہ 25/7/017

کو خارج کر کے واپس کر دیا۔ جوئے صدر مدرسہ۔ ناہائیز۔ خود ساختہ۔ فن لکڑی

حلف قانون۔ حلف واقعات۔ حلف روزگار کر شینہ۔ ملا جوار۔ ملا اختیار

میں پیر پتی و صاحبی ہر نیکی بھگت مورخ 25/7/17 قد عمر قابل فسر فی ہے

سینور جج۔ اور عدلی کو از تاریخ Appointment انڈیکٹ قد عمر واپس

جارج۔ حق عدلی پیر حلف در ملا علیہ صوفی قد عمر

Order #
Senior Civil Judge,
Bannu
26 OCT 2017

ب۔ دعویٰ میں ڈگری اعداد حکم اقتالی دوران و نا لکڑی میں بیٹوں کو لکڑی

کو حکم دیا جائے کہ وہ ملکہ و عند قانونی بھگت مورخ 25/7/17 کو از خود مسروح

کر کے عدلی کو سالانہ انڈیکٹ از تاریخ Appointment جاری کر کے

حق عدلی پیر حلف در ملا علیہ صوفی قد عمر

حالت مقدمہ عدلی کو کر کے فیصلہ

ا۔ سن 2007

ب۔ سن 2007

ا۔ سن 1997

ب۔ سن 2007

حساب مالی، دعویٰ عدلی و ذیل ہے

1) راج عدلی محمد تقیم فی عدلی کر دیا 23/24 سال تک تدریس کے مقصد سے واپس دیا

اور مورخ 4/6/09 کو بطور SET نیکی رٹیا کر مہو کیا ہے۔ نقل نیشنل بک و

مہروں تک لے لیا۔ عدلی کو Appointment کر کے 14/7/99 کو عدلی کو

12) راج عدلی Untrained Teacher تھا۔ اور محمد تقیم کو کافی خدمت کر چکا ہے

FD(PRC) 5-2/2002
 Order #
 Annual Increment / Running pay Untrained 30 ¹⁰/₀₉
 Senior 28 OCT 2017
 Grant پاکستان کے لئے اور یہی ضروری ہے

All those Untrained Teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.

سارے تعلقہ میں مذکورہ ہے۔

4) یہاں بھی یہی اصول Increment مذکورہ درجہ کے کوئی بھی درجہ میں 15 ²/₀₁₇ گزاری۔ یہ بھی کہ تعلقہ میں یہی حال ہوگا۔ Increment کا اصل درجہ ہے۔ تعلقہ میں ہے۔

5) یہاں بھی یہی درجہ مذکورہ درجہ کے لئے یہی اصول ہے۔ 25 ⁷/₀₁₇ DAO/BU/Admn II/2017-18 میں یہی درجہ میں کوئی بھی خارج ہوتے ہیں۔ تعلقہ میں ہے۔

6) یہاں بھی یہی درجہ مذکورہ درجہ کے لئے یہی اصول ہے۔ 30 ¹⁰/₀₉ Increment مذکورہ کا یہی appointment ہے 4 ⁷/₇₉ ہے۔

Ord. #
Senior Civil Judge
Faisalabad

26 OCT 2017
25/7/17

صدر دفتر دارالحاجہ - اورنگ شہر علیحدہ روڈ 25/7/17 سے امرتسر کے ناچارانہ

خود مصافحتہ - صلاحات قانونی - صلاحات واقعات - صلاحات در لٹریچر - صلاحات در لٹریچر - صلاحات در لٹریچر

ملا اختیار - معنی پر یہ نہیں دیکھا گیا اور معیار میں مہینے حقوق عدلیہ پر عملدرآمد و خالصہ کے اور

قابل حصول ہے - اور عدلیہ کو Increment قدرتی قابل اجراء ہے

7) یہ عدلیہ معیار کو کاربند نہیں کیا گیا - تا وہ عدلیہ کو Increment قدرتی جاری کرے

مقررہ اولڈ ٹائل منول کرتے رہے - اب عدلیہ معیار سے صاف انکار کر رہی ہے

اس لئے دعویٰ ہے دار لٹریچر کے ان ضرورت لائق نہیں ہے

8) یہاں تاہم دعویٰ عدلیہ کو از فور 25/7/17 جبکہ نہایت مخالفت از صاف انکار عدلیہ معیار

مقررہ ایک معیار معیار میں پیدا نہیں ہے - جس سے مخالفت کا اختیار عدلیہ کو الٹا معیار میں

9) یہاں تاہم عدلیہ معیار کو رٹ صحت و اختیار مخالفت عدلیہ درج معیار اور عدلیہ معیار

ملا اختیار کیا گیا ہے تا ڈگری معیار عدلیہ معیار عدلیہ معیار عدلیہ معیار

حق عدلیہ پر صلاحات عدلیہ معیار عدلیہ معیار عدلیہ معیار عدلیہ معیار

25/10/2017
صدر دفتر دارالحاجہ معیار معیار معیار معیار معیار

25.10.2017

روف سباز - عدلیہ
روف سباز

دعویٰ عدلیہ معیار معیار معیار معیار معیار
دار لٹریچر در صحت و معیار معیار معیار معیار معیار

روف سباز - عدلیہ
روف سباز

بذریعہ دفتر شہید خان ایجوکیشن

Handwritten signature

BEFORE THE HONOURABLE SERVICE TRIBUNAL, PESHAWAR.

Court case in respect of Rauf Niaz Ex.SST.....Plaintiff

Secretary to Government School and literacy Department Khyber Pakhtunkhwa and others

Respectfully sheweth.

Joint Para wise comments in respect of Respondents No.02 and 05 is as under.

Preliminary Objection.

1. The Plaintiff has no cause of action against respondent No.02 and 05.
2. The plaintiff has not come to the court with clean Hands.
3. The instant case is barred by law.
4. The case of the plaintiff is vexatious and frivolous, hence liable to be rejected.
5. The plaintiffs conceal the material facts from the court of law.


Facts.

01. The plaintiff did not disclose the fact of his service as per follows.
 - a. The official appointed as SET teacher on fixed pay untrained 12.04.1979 vide DD Education DI Khan Division Endst No.4442-46 dated 12.04.1979 and terminated vide order no. Director education DI Khan Division No.09 dated 01.01.1983. Total period served wef 12.04.1979 to 31.12.1983 at page 11 (Flag A)
 - b. Remained out of service 01.01.1983 to 24.01.1983.
 - c. Appointed as SV fixed pay vide order No.DDE DIKhan Division Endst No.1563-66 A-6/CI/BXU/25-01.1983 and again terminated vides order no. Memo No.6672/AE-VII/F-A-SV dated 08.05.1983 total period served wef 05.01.1983 to 08.05.1983 at page#03 (Flag B).
 - d. Remained out of service 01.01.1983 to 24.01.1983.
 - e. Again appointed SV fixed pay untrained vides Order No.Endst No.15593-632 dated 08.11.1983 then resigned from service wef 21.04.1984 which was accepted by department vide Ends No.6519-23/AE-VII/F-A dated 14.04.1984.total period served wef.15.04.1984 to 19.08.1985 at page# 03 (Flag B)
 - f. Again appointed as CT Vide No.DDE(s) DIKhan division endst No.12439-43/C-3/correspondenc/SET/BXU dated 20.08.1985. The official served against the post of CT wef 20.08.1985 to 30.08.1988 at page #05 (Flag C).
 - g. The official appointed as SET Agricultural on the basis of vocational teacher training passed on 22.08.1988 vide Ends No.16222-28/AE-III/625 dated 31.08.1988 at page 11 (Flag D).
 - h. The official was regularized against the post of SET agricultural wef 01.09.1988 vide DSE NWFP Endst No.2907-15/A-E-14 dated Peshawar 01.07.1998 and served till his retirement at page 19 (Flag E).

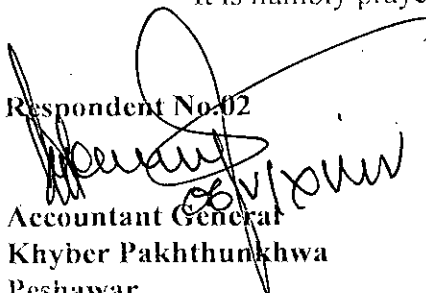
- i. The above history clearly shows that teacher did not serve regularly wef 12.04.1978 rather he was regularly appointed against the post of SET wef 01.09.1988 and all the pension benefit was given to him as per rules wef 01.09.1988.
02. The letter of this office vide NO. DAO/BU/Admin-II/Post Office/2017-2018 dated 25.07.2017 is covered under the rules. This letter is an informative letter based on rules and rules can not be override which is still intact (Flag E-A).
03. It is correct that honorable civil judge returned the case with the direction to approach the proper forum constituted for the purpose.

Grounds.

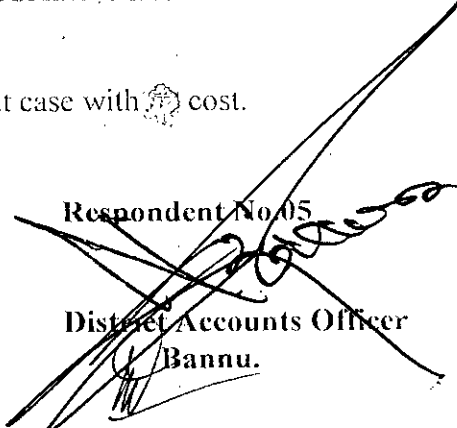
- I. As per para -2 facts above.
- II. The finance department letter No.FD (PRC-5-2/202 dated 30.10.2009 under the direction of apex court is not applicable on him as he was not regularized on the same post where the untrained period pertain. (Flag F-A).
- III. a. The untrained period is considered for annual increment when the teacher is trained in the same cadre in which he is employed. The teacher has been trained in February 1987 and result declared on 22.02.1988.
b. The teacher is concealing the facts because he is entitled for pensionary benefits wef 01.09.1988 which has already been awarded to him.
- IV. Resignation once accepted can not been withdrawn under the rules vide authority S&GAD Letter No.SOSXII/2-96/59 dated 24.12.1959. (Flag F).

It is humbly prayed to dismiss the instant case with  cost.

Respondent No.02


Accountant General
Khyber Pakhthunkhwa
Peshawar

Respondent No.05


District Accounts Officer
Bannu.

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Lower Court Bannu
11/77

Page - A

Leave granted on medical ground
w/e 20.9.80 to 30.9.80 (11 days) on
full pay and w/e 17/11/79 to 23/12/79 without
pay vide Div. Director of Edu. & Training
No 7832 dated 25/10/79

Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitab; to any other Government servant	Signature of the head of the office or other Attesting Officer	Reference to any recorded award or praised of the Government servant
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3/9 (AN) Transfer
81
Jmlakhan

Appointed against S.E.T. post
in N.P.S NO. 14 (Rs 520/- p.m. fixed)
vide D.E (S) NWFP Peshawar
Enlist No 4442-46 dated
12/4/79

Form 1045
Form 1046
Form 1047
Form 1048
Form 1049
Form 1050
Form 1051
Form 1052

Services verified from 14/79
to 3.9.81 from the acquittance
roll & other record of this
School. Jmlakhan

Chief Officer
High School
Khai (Bannu)

Chief Officer
High School
Khai (Bannu)

Services verified from 5/9/1981
to 22-5-1982 from the ACQ:
roll & other record of this school

H.M.
G.H.S
S.K. Pak

Services verified
vide
Divisional
Director of Edu.
No. 14
1-1983

Services Verified
From 23-5-81 to 30-10-82
From the acquittance Roll
& other Office record.

Verified from 21.10.1982
to 30.10.82 from the office record

H.M.
G.H.S
S.K. Pak

G.H.S
S.K. Pak

G.H.S
S.K. Pak

9	10	11	12	13 LEAVE		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Allocation of periods of leave on average pay, upto four months (or earned leave not exceeding 20 days) to which leave salary is debitable to another Government.		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
				Nature and duration of leave taken	Govt. to which debitable		
				Period	Govt. to which debitable		
<p>Headmaster Mamaab Koc Bannu</p> <p>TESTED Agency Court Bannu</p>	<p>15/5/83</p>	<p>Terminated</p> <p>Govt: High School Mamaab Koc Bannu.</p>	<p>27-1-83</p>	<p>15-5-83</p>	<p>Appointed against 80 Post vide D.O. (S) D.T. Khan D.D.M. D.T. Khan Enclt. No: 1563-66/A-6/cx/Bxv-d-25-1-83</p>	<p>Headmaster Government High School Mamaab Koc Bannu</p>	<p>مذا یا جریا یا غیر مناسب کار کردی کا ریکورڈ</p>
<p>Head Master Govt: High School Mamaab Koc Bannu.</p>	<p>16-11-83</p>	<p>Resignation of Raif Khan 21-4-84 Khan 21-4-84 vide D.O. (S) D.T. Khan D.D.M. D.T. Khan Enclt. NO. 6519-23/AE III/A dated 14-4-1984</p>	<p>16-11-83</p>	<p>16-11-83</p>	<p>Appointed against 80 Post vide D.O. (S) D.T. Khan D.D.M. D.T. Khan Enclt. NO: 15593-588 Dated 8-11-83</p>	<p>Head Master Govt: High School Mamaab Koc Bannu.</p>	<p>مذا یا جریا یا غیر مناسب کار کردی کا ریکورڈ</p>

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9
Copying Agency
Lower Court Bannu

2	3	4	5	6	7	8	
Name of post دورہ ملازمت	Whether substantive or officiating, and whether permanent or temporary حاضری یا عارضی مقام	If officiating, state— (i) substantive appointment or (ii) whether service accounts for pension under rule 120 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا اور کون سا مقام یا عہدہ ہے	Pay in substantive post تعمولہ بطور عارضی ملازمت	Additional pay for officiating زائد تعمولہ بطور عارضی مقام	Other emoluments falling under the term "pay" تعمولہ دیگر	Date of appointment تاریخ تقرری	Signature of Government servant دستخط ملازم
B.P.S. 9 Rs. 620-29-1200 (C.T.)							
S.H.S. Dalgair Bannu	Off/Temp		Rs. 620/- fixed			31/8/85	Rauf Niaz
Provisional pay fixed in B.P.S. No. 9 Rs. 830-38-1570 vide Finana. Deptt. Letter No. FD(LRC)-187-VIII dt 22-7-87 on point to point basis.							
C.T. Mast	Off/Temp		Rs. 830/-			1/1/87	Rauf Niaz
B.P.S. No. 15. 1165-71-2585							
S.E.T. (Agg)	Off/Temp		1165/-	9 P. pm. 33/-		1/9/88	Rauf Niaz
F.H.S. Thirimala	Off/Temp		1236/-	9. Pay 35/-		1/12/89	Rauf Niaz
- Do -	Off/Temp		1307/-	9. Pay 37/-		1/12/90	Rauf Niaz
pay provisionally fixed in BPS-15							
Scale 15: - 1620 - 131 - 3585							
G.H.S. Thirimala	Off/Temp		1892/-	pm. X		1/6/91	Rauf Niaz
pay provisionally fixed in BPS-16							
Scale 16: - 1875 - 146 - 4065							

Signature of
the
office
Attest
of col
...

CP: At
Bannu
GHS Ltd

H.M.
Bannu

Govt.
Bannu

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ATTESTED

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Lower Court Bannu
7/27

ING.

5

3

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and Duration of leave taken	Allocation of periods of leave on average not exceeding four months (to be earned by leave) or exceeding 120 days (to which leave salary is payable) by another Government	Reference to any recorded punishment or censure
<p><i>H.M. Ghossein</i> Headmaster GHS Lalozai Bannu</p>	<p>31-11-84 Principal, GHS Ghoriwala (Bannu)</p>	<p>Incr 30-11-84</p>	<p><i>H.M. Ghossein</i> Headmaster GHS Lalozai Bannu</p>	<p>Appointed against C.T. Post vide D.O. (S) Dt. Khan Diran Dt. Khan Endst. No 12439-43/6-3 Correspondence/SET/Bx dated 20.8.85</p>	<p>Govt. to which debtible Period Korlehit Jum 11/11</p>	<p>Headmaster GHS Lalozai Bannu</p>
<p><i>H.M. Ghossein</i> Headmaster GHS Lalozai Bannu</p>	<p>31-11-90 Principal, GHS Ghoriwala (Bannu)</p>	<p>Incr 30-11-90</p>	<p><i>H.M. Ghossein</i> Headmaster GHS Lalozai Bannu</p>	<p>Appointed against C.T. Post vide D.O. (S) Dt. Khan Diran Dt. Khan Endst. No 12439-43/6-3 Correspondence/SET/Bx dated 20.8.85</p>	<p>Govt. to which debtible Period Korlehit Jum 11/11</p>	<p>Headmaster GHS Lalozai Bannu</p>
<p><i>H.M. Ghossein</i> Headmaster GHS Lalozai Bannu</p>	<p>31-11-91 Principal, GHS Ghoriwala (Bannu)</p>	<p>Incr 30-11-91</p>	<p><i>H.M. Ghossein</i> Headmaster GHS Lalozai Bannu</p>	<p>Appointed against C.T. Post vide D.O. (S) Dt. Khan Diran Dt. Khan Endst. No 12439-43/6-3 Correspondence/SET/Bx dated 20.8.85</p>	<p>Govt. to which debtible Period Korlehit Jum 11/11</p>	<p>Headmaster GHS Lalozai Bannu</p>

1.23
2/11

one income
90 28 91 (2-24)

8 X 326/49

Service Verified
From 31-8-85 to 30-11-85
From the Acquittance Roll
& other Office record.

Headmaster
GHS Lalozai Bannu

1	2	3	4	5	6	7	8
Name of post ذبح ملازمت	Whether substantive or officiating and whether permanent or temporary عارفی، مستطیل یا قائم مقام	If officiating: (a) substantive appointment or (b) whether service units for pension under rule 3.2b of C.S.R. (Pn) volume II اگر عارضی ہے تو کیا وہ رول کے مطابق پینشن کا مستحق ہے؟	Pay in substantive post تظواء بطور عارضی ملازمت	Additional pay for officiating زائد تظواء بطور قائم مقام	Other allowances falling under the term "pay" ماہوالے تظواء دیگر الاؤنس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم
861 G.M.S. Euphrasala S.E.T Post	off/1cm/2		RS. P. 2021/-pm	RS. P.		1-6/91	Kaufman
DO	DO		2167/-pm			1-12/91	Kaufman
DO	DO		2313/-pm			1-12/92	Kaufman
DO	DO		2459/-pm			1-12/93	Kaufman

Signature of the Officer in Charge of Office
All Office attest of the Officer

Principal S. Ghosh (ANNU)
The
AGM
The
S.E.T. Post
G.B.S. (1941)

ATTESTED
Copy of Agency
by the Agency Bannu
20777

11

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 3	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government Govt. to which debitable	Signature of the Head of the office or other Attesting Officer	Reference to any recorded punishment or censure
Principal GHS Ghoriwala (H.S.H.U.) Principal GHS S. Skindar Khal Bala BANNU	25/9/95	transfer	Principal GOVT. HIGH SCHOOL GHORIWALA (H.S.H.U.)	<p>Appointed against post and advertised at R.H.S. Ghoriwala (Bannu) vide D.D.E (S) D.D. Khan. Designation D.D. Khan. Enrol. No. 16222-28/AB-III/625 dated 31/8/1988.</p> <p>Passed one year prescribed Programme of Vocational Teacher Training held by the N.C.E.F.P. Board of Technical Education in 11 month of Feb, 1987 and Secured 1078/200 marks placed in grade "C".</p> <p>Result declared on 22/2/88.</p>	Principal GOVT. HIGH SCHOOL GHORIWALA (Bannu)	<p>(7) Service verified C/LB-13-3-91 To 31-8-95 from A/Roll and office record</p>

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 Lower Court Bannu
 27/17

2	3	4	5	6	7	8	9
Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether, vice counts for pension under rule 3.20 of C.S.R. (Pb.) volume I	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or the Attesting Officer in attestation of column 1 to 8
S.E.T. Post S.H.S.S. Sik Bala	Officer Pay fixed	Rs. 2751	(1875) (146-4065) (2535-197-5490)	438	31/95	Rampal Singh	Principal S.S. Bala 1/93 Rampal Singh
do	do	Rs. 2871	do	do	do	do	do
do	do	Rs. 3914	do	do	6/94	Rampal Singh	do
do	do	Rs. 4111	do	do	12/94	Rampal Singh	do

Revised Entires - B-16 (1875) (146-4065) (2535-197-5490)

Revised Scales w.e.f. 1-6-94 = BPS-16
B-16 (2535-197-5490)
Pay fixed provisionally.

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Lower Court Bannu
20-7-77

Signature and designation of the Head of the office or the Attesting Officer in attestation of column 1 to 8

Principal
S.S. Bala
1/93 Rampal Singh

do

do

do

8	9	10	11	12	13	14	15
Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
Period	Govt. to which debitable						
<p>Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 8</p> <p>دستخط سرکار</p>	<p>31-8-85</p>	<p>5 Months & 09 days</p>	<p>Signature of the Head of the office or other Attesting Officer</p> <p>دستخط سرکار</p>	<p>Nature and duration of leave taken</p> <p>دستخط سرکار</p>	<p>Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government</p> <p>دستخط سرکار</p>	<p>Signature of the head of the office or other Attesting officer</p> <p>دستخط سرکار</p>	<p>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</p> <p>دستخط سرکار</p>
<p>did not contain...</p> <p>دستخط سرکار</p>	<p>31-8-85</p>	<p>5 Months & 09 days</p>	<p>Signature of the Head of the office or other Attesting Officer</p> <p>دستخط سرکار</p>	<p>Nature and duration of leave taken</p> <p>دستخط سرکار</p>	<p>Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government</p> <p>دستخط سرکار</p>	<p>Signature of the head of the office or other Attesting officer</p> <p>دستخط سرکار</p>	<p>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</p> <p>دستخط سرکار</p>
<p>Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 8</p> <p>دستخط سرکار</p>	<p>31-7-98</p>	<p>5 Months & 09 days</p>	<p>Signature of the Head of the office or other Attesting Officer</p> <p>دستخط سرکار</p>	<p>Nature and duration of leave taken</p> <p>دستخط سرکار</p>	<p>Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government</p> <p>دستخط سرکار</p>	<p>Signature of the head of the office or other Attesting officer</p> <p>دستخط سرکار</p>	<p>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</p> <p>دستخط سرکار</p>

Just debarred

Signature

13

31-7-98

Confirmation/Approval

Approved vide Selection Committee held on 27-6-98 wef 1-9-1988, vide DSE...

Ends. No. - 2907-15/A-E-14/S, dated Peshawar the 17-9-88

Signature

Govt. Higher Secy School

31-8-85 31-7-98

ATTESTED

Signature

2/11/7

Name of post ترجمہ ملازمت	Whether substantive or officiating and whether permanent or temporary حاضری و مستعمل یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر حاضری ہے تو کیا وہ رول کے مطابق پنشن کا مستعمل ہے؟	Pay in substantive post تنخواہ بطور حاضری ملازمت	Additional pay for officiating زائد تنخواہ بطور قائم مقام	Other emoluments falling under the term "pay" سوائے تنخواہ دیگر الاؤنس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم
S.V. GHS Marmath Off/Temp. Khet (Bannu)			RS. P. 370/- Fixed	RS. P. Fixed		27/11/83	Rauf Aliq
S.V. GHS Marmath Off/Temp. Khet (Bannu)			RS. P. 620/- Fixed	RS. P. Fixed		16/11/83	Rauf Aliq

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 Lower Court Bannu
 20-117

P. 620-89-12000 V. 25-9

1. Name _____ (نام)

Mr. Reufiaz Khan
Pakistani / Islam

2. Nationality and Religion _____ (قومیت اور مذہب)

3. Residence _____ (مستقل رہائش)

Village: Basia Khel, B. Umargha
Dist: Bannu

4. Father's name and residence _____ (والد کا نام اور رہت)

Mir Mukhammad Ayyaz

5. Date of birth by Christian era as nearly as can be ascertained _____ (تاریخ پیدائش مطابق سن منسوی)

5-6-1949

6. Exact height by measurement _____ (قد و قامت)

(Fifth June N.H. & Forty Nine)

7. Personal mark for identification _____ (شخصی نشان)

6-6

8. Left hand/right hand thumb and finger impressions of (None-gazetted) officer. (بروزی صورت میں ہاتھ اور صورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Scars on four hand

Little Finger (چھٹکا)

Ring Finger (خانہ کی انگلی)

Middle Finger (انگشت میانی)

Fore Finger (انگشت شہادت)

Thum (انگلی)

9. Signature of Government servant _____ (سرکاری ملازم کے دستخط)

Reufiaz

10. Signature and designation of the Head of the Office, or other Attesting Officer _____ (تسلطی کنندہ کے دستخط اور سر)

Muzaffar Ahmad
11/5/53

Attested
Principal
Basia Khel Bannu

Note :- The entries in this page should be renewed or re-attested at least every five years and the signatures lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule. اس صفحہ کے دستخطات کم از کم ہر پانچ سال بعد تازہ کرنا ضروری ہیں اور ہر پانچ سال کے بعد دستخطوں کے تاریخ ہونی چاہئے۔ انگلیوں کے نشانات کم از کم ہر پانچ سال کے بعد تازہ کرنا ضروری ہیں۔

ATTESTED
Coding Agency
Lower Court Bannu
20/1/77

993
972



**OFFICE OF THE
DISTRICT ACCOUNTS OFFICER
BANNU**

FAX/PHONE NOs 0928-9270030 & 68

No.DAO/BU/Admn-II/Post Office/2017-18/

Dated: 25/07/2017

To

Mr,Rauf Niaz ,
Ex.SET at GHS S.K BALA,
BANNU.

Subject: UNTAINED SERVICE INCREMENTS ON SET POST WEF 14.04.1979.

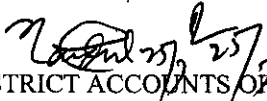
Memo:

Kindly refer to your application Dated 21.03.2017 for grant of annual increments of untrained service on SET post wef 14.04.1979.

As per this office record the applicant has resigned from service wef 21.04.1984 vide letter NO:6519-23/AE VIII/A Dated 14.04.1984.

- 1) Meanwhile the applicant has been appointed as SV post dated:25.01.1983 up to 30.08.1985.
- 2) The applicant again appointed on CT post vide letter No:12439-43/C-3/Corrsp/SET/BU Dated 20.08.1985 up to 31.08.1988.
- 3) On 31.08.1988 the applicant once again appointed against SET (Agri) Post vide E/NO:1622-28/AE-III/625 Dated 31.08.1988.

~~Now~~ The benefits of untrained service is admissible only when the teacher concerned have been trained on the same post.


DISTRICT ACCOUNTS OFFICER
BANNU

Servants Revised Leave Rules, 1981. In the light of Rule 12, ibid, a willful absence of more than five years shall not be converted into leave without pay.

5. It is therefore, requested that the above instructions may be brought to the notice of all concerned for strict compliance in future.

(Authority: S&GAD's letter No. SORII(S&GAD)6(37)/89, dated 3rd Oct, 1989)

Determination of seniority of officials who are allowed to withdraw their resignation

A question has arisen whether a Government servant who resigned and has subsequently been allowed to withdraw his resignation should be assigned seniority and given other benefits which would have accrued to him had he not resigned.

2. When a resignation tendered by a Government servant has been accepted and the acceptance has been communicated to him, it becomes final. There can be no question of allowing him to 'withdraw' the resignation.

3. Where a Government servant who has tendered resignation withdraws it before it is accepted by the competent authority or where, after the acceptance but before the acceptance is communicated to him, he is allowed to withdraw the resignation, he continues in the post held by him without a break and the question of re-fixation of his seniority, etc. does not arise.

4. Where an appellate authority finds that the resignation was not tendered voluntarily or that it is otherwise null and void, the appellate authority may re-instate the Government servant concerned. On re-instatement the Government servant shall be regarded as having continued in service throughout.

5. If a Government servant whose resignation has been accepted and communicated to him, is appointed to Government service thereafter, such appointment shall be regarded as a fresh appointment. The seniority, pension, leave, etc. of such a Government servant shall be fixed in accordance with the rules applicable to him as if this appointment was his first appointment to Government service.

6. There may, however, be cases in which it may not be fair to treat such a re-employed Government servant as a new recruit and it is proposed to give him any benefit in relaxation of the rules, the orders of the Government should invariably be obtained.

(Authority: S&GAD letter No. SOXII/2-96/59, dated 24.12.59)

Preparation/issuance of seniority list of Government Servants

I am directed to say that sub-section (1) of Section 8 of the NWFP Civil Servants Act, 1973, inter alia provides that for proper administration of service, cadre or post, the appointing authority shall cause to prepare a seniority list of the members for the time being of such service, cadre or post. Similarly, the note below clause (e) of sub-rule (2) of the rule 6 of the NWFP Service Tribunals Rules, 1974, enjoins upon the appointing authority or any other authority which has been delegated the powers to make decision regarding seniority of

کینٹنمنٹ قرار داد اور مستحق طلب
(حکم 5 قواعد 1، 2، 3، 4، 5، 6، 7، 8، 9، 10، 11، 12، 13، 14، 15، 16، 17، 18، 19، 20، 21، 22، 23، 24، 25، 26، 27، 28، 29، 30، 31، 32، 33، 34، 35، 36، 37، 38، 39، 40، 41، 42، 43، 44، 45، 46، 47، 48، 49، 50، 51، 52، 53، 54، 55، 56، 57، 58، 59، 60، 61، 62، 63، 64، 65، 66، 67، 68، 69، 70، 71، 72، 73، 74، 75، 76، 77، 78، 79، 80، 81، 82، 83، 84، 85، 86، 87، 88، 89، 90، 91، 92، 93، 94، 95، 96، 97، 98، 99، 100)

XII - 11

نمبر درجہ اول مقدمہ لوفت نام
دوسرے نام (5) ڈسٹرکٹ ایگزیکیوٹو ایفیسر ضلع بٹن

ہرگز کہ مدد کی ہے آپ کے خلاف ایک مقدمہ جسکے عرضی دعویٰ کی نقل لفٹ ہوا ہے۔ بابت
11 مارچ 2017ء کو بتاریخ 20 مارچ 2017ء کو
8:30 بجے اساتذہ یونیورسٹی میں جوائنٹ میٹنگ ہوئی جسکے متعلق تمام ضروری سوالات کا جواب دے سکتا ہو یا
جسکے ہمراہ کوئی ایسا شخص ہو جو ایسے سوالات کا جواب دینے کے قابل ہو حاضر عدالت ہو کر دعویٰ داری کی جوابدہی کرے۔ آپ کو مزید ہدایت
کیجاتی ہے کہ بتاریخ مذکورہ وہ تمام دستاویزات جن پر آپ اپنے دفاع میں انحصار کرنا چاہتے ہیں پیش کرے۔ نیز بتاریخ مذکورہ یا اسے قبل اپنا
جواب دعویٰ داخل کریں۔ واضح ہو کہ بتاریخ مذکورہ آپ کی عدم حاضری کی صورت میں مقدمہ آپ کی غیر موجودگی میں سماعت اور فیصلہ کی جائے
گی۔

آج بتاریخ 27 مارچ 2017ء کو سماعت ہوئی۔

نمبر 185

تاریخ 28/3/17

M. Tahir 43

(47/31/10/017)

11 جنوری

(نوٹ) پیادہ ضابطہ اندر 7 پریم قبیل کر کے بتاریخ 5/11/17 واپس کرے۔

تاریخ جس پر واپس کیا

SPK
Mr. Kanooq
31/10

Bdu:

ATD (pa-II)

31-10-2017



اعدالت خانات سندھ عدالت عالیہ لاہور

بروف بناؤ والا عدالت عالیہ لاہور میں عدالت عالیہ لاہور میں جج صاحب محترم مورخہ

تمام

- 1) عدالت عالیہ سندھ لاہور کی عدالت عالیہ لاہور میں جج صاحب محترم مورخہ
- 2) اٹارنی جنرل عدالت عالیہ لاہور کی عدالت عالیہ لاہور میں جج صاحب محترم مورخہ
- 3) ڈائریکٹر عدالت عالیہ سندھ لاہور کی عدالت عالیہ لاہور میں جج صاحب محترم مورخہ
- 4) ڈائریکٹر عدالت عالیہ سندھ لاہور کی عدالت عالیہ لاہور میں جج صاحب محترم مورخہ
- 5) ڈائریکٹر عدالت عالیہ سندھ لاہور کی عدالت عالیہ لاہور میں جج صاحب محترم مورخہ

برائے علم

و دعویٰ عدالت عالیہ سندھ لاہور میں عدالت عالیہ لاہور میں جج صاحب محترم مورخہ

روز 14/4/1979 Appointment مورخہ 14/4/1979 اور کے عدالت عالیہ لاہور میں

اور عدالت عالیہ سندھ لاہور میں 2/2/2002 FD(PCR) مورخہ 30/10/2009 کے مطابق

نیشنل ڈیپارٹمنٹ Annual Increment / Running pay از تاریخ

Appointment مورخہ 14/4/79 بحال رہا ہے اس کے بعد اس کا جج صاحب

فرار رہا ہے۔ جو اس بات پر عدالت عالیہ سندھ لاہور میں عدالت عالیہ لاہور میں

ذرا احتیاط کرنا چاہیے۔ 15/2/017 مورخہ 15/2/017 کے بعد اس کا جج صاحب

کا مورخہ 18-2017/II-Ann/BU/DAO مورخہ 25/7/017 کے مطابق

کو خارج کر کے درجہ ترقی دیا۔ جو اس سرکار میں نہ تھا۔ نا جائز۔ خود ساختہ۔ من گھڑت
 حلف ناموں۔ حلف واقعات۔ حلف اور ترقی پتوں۔ ملازمین۔ ملازمین۔
 سب سے پہلے درجہ ترقی دیا گیا۔ سرکار میں۔ 25/7/07 کو سرکار میں ترقی ہوئی ہے۔
 مستحق مزید۔ اور ترقی کو اس نام پر Appointment انگریزوں کے سرکار دیا
 جا رہا ہے۔ ترقی ہو کر حلف کے نام سے ترقی ہو رہی ہے۔

ب۔ دوسری طرف ترقی دیا گیا حکم انتظامی درجہ ترقی پتوں کے نام سے
 کو حکم دیا جا رہا ہے کہ وہ حلف وغیرہ ترقی پتوں کے نام سے ترقی ہو رہی ہے۔
 ترقی ہو کر سالانہ Appointment انگریزوں کے سرکار دیا جا رہا ہے۔
 ترقی ہو کر حلف کے نام سے ترقی ہو رہی ہے۔

حالت مقدمہ ترقی پتوں	حالت مقدمہ ترقی پتوں
ا۔ سن 2007	ا۔ سن 1970
ب۔ سن 2007	ب۔ سن 2007

حالیہ حال۔ دوسری طرف ترقی ہو رہی ہے۔

ا۔ ترقی پتوں کے نام سے ترقی دیا گیا۔ 23/24 سال تک ترقی پتوں کے نام سے دیا گیا۔
 اور ترقی 4/09 کو ترقی SET کے نام سے ترقی دیا گیا۔ ترقی پتوں کے نام سے
 ترقی ہو کر ترقی پتوں کے نام سے ترقی ہو رہی ہے۔ Appointment کے نام سے 14/7/99
 ترقی ہو کر Untrained Teacher کے نام سے ترقی دیا گیا۔ اور ترقی پتوں کے نام سے ترقی دیا گیا۔

3) FD(PRC) 5-2/2002 سے لڑنے والے (NSAFP) KP میں

Annual Increment/Running pay کو Untrained $30 \frac{10}{109}$

میں سے لڑنے والے کو Grant کیا۔ اور یہی طور پر ہے

All those Untrained Teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.

مقرر کیا۔ نقل شدہ مذکورہ ہے۔

4) یہ بھی ہے کہ Increment مذکورہ درجہ 5 کو ڈگری

درجہ $15 \frac{2}{17}$ ڈگری۔ یہ بھی کہ یہاں سے مندرجہ ذیل

Increment کا اضافہ ہونا چاہیے۔ نقل درجہ 5 ہے۔

5) یہ بھی ہے کہ درجہ 5 کو ڈگری کا درجہ 7 سے اضافہ ہونا چاہیے

DAO/BU/Admin II/2017-18 سے $25 \frac{7}{17}$ درجہ 5 کو

ڈگری سے لڑنے والے کو یہ بھی ہے۔

6) یہ بھی ہے کہ یہاں سے لڑنے والے کو $30 \frac{10}{109}$ Increment

مذکورہ کا درجہ 7 سے 79 appointment سے لڑنے والے کو

صدر دفتر خارجہ - اورج سٹیٹ بینک پاکستان 25/7/17ء سے 25/7/17ء تک - تاخیر

خود مصافحہ - خلاف قانون - خلاف واقعات - خلاف زر و زر اور زر - ملازمت اور
ملازمت اختیار - مندرجہ ذیل و سہ ماہی میں مندرجہ حقوق و فرائض و فرائض کے اور
قابل مندرجہ ہے - اور مندرجہ Increment مندرجہ قابل اجراء ہے

(2) مندرجہ فرائض کو باہر رکھا گیا - تاہم مندرجہ Increment مندرجہ جاری ہوگی
مگر وہ اصل قابل قبول نہ رہے - اس کے ساتھ ساتھ مندرجہ صاف الفاظ میں

اس لئے دعویٰ کیا جائے گا کہ ضرورت لاحق ہوگی

(8) ان سب سے مندرجہ فرائض کو زر و زر 25/7/17ء تک مندرجہ سماعت از صاف الفاظ مندرجہ
مگر وہ اصل قابل قبول نہ رہے - اس کے ساتھ ساتھ مندرجہ صاف الفاظ میں مندرجہ
کو حاصل ہے

(9) یہاں مندرجہ فرائض و فرائض سماعت مندرجہ درج مندرجہ فرائض
مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ

مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ	$25 \frac{10}{2017}$
مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ	$25 \frac{10}{2017}$
مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ	$25 \cdot 10 \cdot 2017$

روف سباز - مندرجہ
روف سباز

روف سباز - مندرجہ
روف سباز

مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ مندرجہ
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KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 956 /ST

Dated: 15-4-2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

To

The District Education Officer Male
Government of Khyber Pakhtunkhwa,
Bannu.

Subject: JUDGMENT IN APPEAL NO. 635/2018, MR. RAUF NAIZ

I am directed to forward herewith a certified copy of Judgement dated 02.02.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR

KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

3

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal # 635/2018

Niaz EX-SET (Rtd:) District Bannu.

.....Applicant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others. ...Respondents

**REPLY TO THE APPLICATION FOR CONDONATION OF DELAY FOR & ON BEHALF
OF RESPONDENTS No: 1, 3&4.**

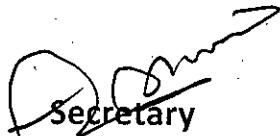
Respectfully Sheweth:-

The Respondents submit as under:-

- 1 That Para-1 is correct that the appeal of the appellant is badly time-barred under the provisions of law of limitation Act 1908 & is liable to be dismissed on this score in favour of the Respondents.
- 2 That Para-2 is also incorrect & denied on the grounds of lack of knowledge is not excuse & filing of case before wrong forum by the appellant is a legal mistake & the Burdon of proof cannot be shifted upon the Respondent as the case in hand is badly time barred.
- 3 That Para-3 is also incorrect & denied. The act of the appellant in approaching Civil Court was intentional. Hence, the delay caused cannot be condoned.
- 4 That Para-4 is incorrect & not admitted. The case of the appellant is badly time barred under the mandatory provisions of law of limitation Act 1908 & is liable to be rejected on this score.

Therefore, it is most prayed that on the acceptance of this reply, the application for condonation of delay may very graciously be dismissed in favour of the Respondents with the additional submission that the facts & grounds taken in the reply to the main Service Appeal may also be treated as an integral part of this reply to be said application on behalf of the Respondents.

Dated ___ / ___ /2019


Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

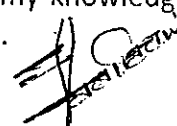
(Respondent No: 1)


Director

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 3&4).

AFFIDAVIT

I, Hayat Khan Asstt: Director(Lit: II) E&SE Department Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm & declare on oath that the contents of the instant reply to the application in the titled Service appeal are true & correct to the best of my knowledge & belief & nothing has been concealed from the ambit of this Honorable Tribunal.


Deponent

12

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

Service Appeal No: 635/2018

Rauf Niaz EX-SET (Rtd:) District Bannu.

.....Appellant.

VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others. ...Respondents

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF THE RESPONDENTS No: 1-3& 4.

Respectfully Sheweth :-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the appellant has concealed material facts from this Honorable Tribunal, hence liable to be dismissed on this score.
- 4 That the appellant has filed the instant appeal on mala-fide motive.
- 5 That the appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant appeal is based on mala-fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That this Honorable Tribunal has got no jurisdiction to adjudicate upon the present Service appeal.
- 10 That the appeal is not maintainable in its present form & circumstances of the case.
- 11 That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 12 That the impugned Notification dated 25/7/2017 is legal & liable to be maintained. **(Annexure-A).**
- 13 That the appellant is not entitled for the grant of advance increments for his untrained period of service in the Respondent Department.

ON FACTS

- 1 That Para-I, needs no comments, being pertains to the service record of the appellant of both untrained & trained period against various Teaching cadres Posts in the Respondent Department.


- 2 That Para-2 pertains to the Respondent No: 5, District Accounts Officer, Bannu. However, it would be in the interest that the order /some grounds of the impugned order dated 25/7/2017 may kindly be allowed to reproduced.
- 3 That Para-3 pertains to the record of the Learned Civil Judge-XIII Bannu who vide order & judgment dated 31/01/2018 has dismissed/returned the plaint of the appellant under the mandatory provisions of Chapter-II of Civil Servants Act: 1973 Section-17, Section-23(B) & Sections 3&4 of Civil Service Tribunal Act 1974 read with Article-212 of the Constitution of Pakistan 1973 which bars jurisdiction of the Learned Civil Courts in the matters which are directly & indirectly pertains to the terms & conditions of a Civil Servant & as a matter of facts the issue of advance increments of a civil servants also falls within ambit of Article-212 of the constitution 1973. Hence, the Learned Court has correctly dismissed & returned the plaint/Suit to the appellant as he has served the Respondents No: 1, 3 & 4 against the SET/SST Post prior to his retirement from service on 04/6/2009. Hence, the case/appeal of the appellant is liable to be dismissed on the following grounds inter alia:-

GROUND

- I Incorrect & denied. The impugned order dated 25/7/2017 passed by the Respondent No: 5 /District Accounts Officer Bannu is within legal sphere & liable to be maintained.
- II Incorrect & denied. The appellant has willfully tendered his resignation from service. Therefore, the stand of the appellant is baseless & liable to be dismissed.
- III Incorrect & misleading. The appellant has submitted/tendered his resignation from service willfully to the E&SE Department Khyber Pakhtunkhwa, District Bannu whereas, the cited rulings of the Apex Court of law is relating to those tenders who have regularly performed his duty without any resignation & service gap. Therefore, the cited Notification of the Finance Department under reference FD(PRC)5-2/2002 dated 30/10/2009 is not applicable upon the case of the appellant.(Copies of the impugned notifications dated 25/7/2017 & 30/10/2009 respectively are attached as A&B).
- IV Legal. However, the Respondents No: 1, 3&4 seek leave of this Honorable Tribunal to submit additional grounds record & case law at the time of arguments.

In view of the above made submissions, it is humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favour of the respondent Department in the interest of justice.


Dated ___/___/2019



Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 1&2)

AFFIDAVIT

I, Hayat Khan Asstt: Director (Lit: II) E&SE Department Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm and declare on oath that the contents of the instant Parawise Comments in the titled Service appeal are true & correct to the best of my knowledge & belief & that nothing has been concealed from the ambit of this Honorable Tribunal.


Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 3&5)


Deponent

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

Service Appeal No: 635/2018

Rauf Niaz EX-SET (Rtd:) District Bannu:

.....Appellant.

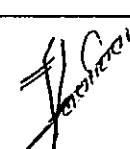
VERSUS

Secretary E&SE Department, Khyber Pakhtunkhwa & others.

.....Respondents

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5			


Asstt: Director (Lit: II)
E&SE Department, Khyber
Pakhtunkhwa, Peshawar.

P-3
ANNAC (A)

(10)

(16)



**OFFICE OF THE
DISTRICT ACCOUNTS OFFICER
BANNU**

FAX/PHONE NOS 0928-9270030 & 68

No.DAO/BU/Admn-II /2017-18/

Dated: 25/07/2017

To

Mr.Rauf Niaz ,
Ex.SET at GHS S.K BALA,
BANNU.

Subject: UNTRAINED SERVICE INCREMENTS ON SET POST WEF 14.04.1979.

Memo:

Kindly refer to your application Dated 21.03.2017 for grant of annual increments of untrained service on SET post wef 14.04.1979.

1 That
2 That
III - That
That
That

As per the record the applicant has resigned from service wef 21.04.1984 vide letter NO: 6519-23/AE-VIII/A Dated 14.04.1984.

- 1) Meanwhile the applicant has been appointed as SV post dated: 25.01.1983 up to 30.08.1985.
- 2) The applicant again appointed on CT post vide letter No: 12439-43/C-3/Corrsp/SET/BU Dated 20.08.1985 up to 31.08.1988.
- 3) On 31.08.1988 the applicant once again appointed against SET (Agri) Post vide E/NO:1622-28/AE-III/625 Dated 31.08.1988.

The benefits of untrained service are admissible only when the teacher concerned have been trained on the same post.

Rauf Niaz
DISTRICT ACCOUNTS OFFICER
BANNU

Ji

ATTESTED

Copying Agency
Lower Court Bannu
21-2-18

BEFORE THE HONOURABLE SERVICE TRIBUNAL, PESHAWAR

Court case in respect of Rauf Niaz Ex.SST.....Plaintiff

Secretary to Government School and literacy Department Khyber Pakhtunkhwa and others

Respectfully sheweth.

Joint Para wise comments in respect of Respondents No.02 and 05 is as under.

Preliminary Objection.

1. The Plaintiff has no cause of action against respondent No.02 and 05.
2. The plaintiff has not come to the court with clean Hands.
3. The instant case is barred by law.
4. The case of the plaintiff is vexatious and frivolous, hence liable to be rejected.
5. The plaintiffs conceal the material facts from the court of law.

Facts.

01. The plaintiff did not disclose the fact of his service as per follows.
 - a. The official appointed as SET teacher on fixed pay untrained 12.04.1979 vide DD Education DI Khan Division Endst No.4442-46 dated 12.04.1979 and terminated vide order no. Director education DI Khan Division No.09 dated 01.01.1983. Total period served wef 12.04.1979 to 31.12.1983 at page 11 (Flag A)
 - b. Remained out of service 01.01.1983 to 24.01.1983.
 - c. Appointed as SV fixed pay vide order No.DDE DIKhan Division Endst No.1563-66 A-6/CI/BXU/25-01.1983 and again terminated vides order no. Memo No.6672/AE-VII/F-A-SV dated 08.05.1983 total period served wef 05.01.1983 to 08.05.1983 at page#03 (Flag B).
 - d. Remained out of service 01.01.1983 to 24.01.1983.
 - e. Again appointed SV fixed pay untrained vides Order No.Endst No.15593-632 dated 08.11.1983 then resigned from service wef 21.04.1984 which was accepted by department vide Ends No.6519-23/AE-VII/F-A dated 14.04.1984.total period served wef 15.04.1984 to 19.08.1985 at page# 03 (Flag B)
 - f. Again appointed as CT Vide No.DDE(s) DIKhan division endst No.12439-43/C-3/corresponedne/SET/BXU dated 20.08.1985. The official served against the post of CT wef 20.08.1985 to 30.08.1988 at page #05 (Flag C).
 - g. The official appointed as SET Agricultural on the basis of vocational teacher training passed on 22.08.1988 vide Ends No.16222-28/AE-III/625 dated 31.08.1988 at page 11 (Flag D).
 - h. The official was regularized against the post of SET agricultural wef 01.09.1988 vide DSE NWFP Endst No.2907-15/A-E-14 dated Peshawar 01.07.1998 at page 19 served till his retirement at page 19 (Flag E).

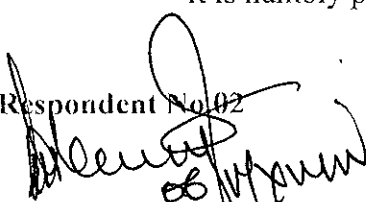
- i. The above history clearly shows that teacher did not serve regularly wef 12.04.1978 rather he was regularly appointed against the post of SET wef 01.09.1988 and all the pension benefit was given to him as per rules wef 01.09.1988.
02. The letter of this office vide NO. DAO/BU/Admin-II/Post Office/2017-2018 dated 25.07.2017 is covered under the rules. This letter is an informative letter based on rules and rules can not be override which is still intact. (Flag E-A).
03. It is correct that honorable civil judge returned the case with the direction to approach the proper forum constituted for the purpose.

Grounds.

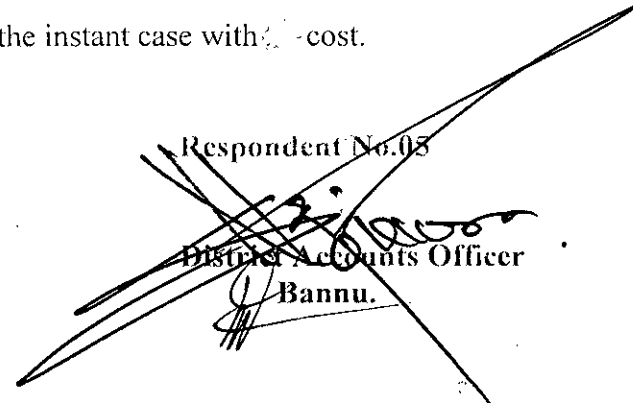
- I. As per para -2 facts above.
- II. The finance department letter No.FD (PRC-5-2/202 dated 30.10.2009 under the direction of apex court is not applicable on him as he was not regularized on the same post where the untrained period pertain. (Flag F-A).
- III. a. The untrained period is considered for annual increment when the teacher is trained in the same cadre in which he is employed. The teacher has been trained in February 1987 and result declared on 22.02.1988.
b. The teacher is concealing the facts because he is entitled for pensionary benefits wef 01.09.1988 which has already been awarded to him.
- IV. Resignation once accepted can not been withdrawn under the rules vide authority S&GAD Letter No.SOSXII/2-96/59 dated 24.12.1959. (Flag F).

It is humbly prayed to dismiss the instant case with $\frac{1}{2}$ -cost.

Respondent No.02


Accountant General
Khyber Pakhthunkhwa
Peshawar

Respondent No.03


District Accounts Officer
Bannu.

ATTESTED

Coaching Agency
Lower Court, Bannu 77

F-A
Leave granted on medical ground
we 20.9.80 to 30.9.80 (11 days) on
full pay and we 17.11.79 to 2.12.79 without
pay vide Div. Director of Edu. Bannu
No 7832 dated 28/11/79

Signature of Government servant	Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of period pay, up to four months (or earned leave, not exceeding 120 days) for which leave salary is debitable to another Government servant	Signature of the head of the office or other Government servant referred to any record of award of leave of the Government servant

3/81 (AN) Transfer
Jmlakhan
CIVILIAN

Form 10
Form 1145
Form 1146
Form 1147
Form 1148
Form 1149
Form 1150
Form 1151
Form 1152
Form 1153
Form 1154
Form 1155
Form 1156
Form 1157
Form 1158
Form 1159
Form 1160

Prof. Amir
Headmaster
Govt. High School
Bannu

Prof. Amir
Headmaster
Govt. High School
Bannu

H.M.
G.H.S.
S.K. Bal

Transferred from 31.10.1982
to 31.10.1982
from the office record

Appointed against S.E.T. post
in N.P.S NO 14 (RS 20/- p.m fixed)
vide D.E (S) NWFP Peshawar
Enlist No 4442-46 dated
12/4/79
Juzi/Janil

(1) Services verified from 14/79
to 3.9.81 from the acquittance
Roll & other record of this
School. Jmlakhan

(2) Service verified from 07/1/1981
to 22-5-1982 from the A.C.P.
Roll & other record of this school

(3) Service Verified
From 22.5.82 to 30.10.82
From the acquittance Roll
& other Office record.

H.M.
G.H.S.
S.K. Bal

G.H.S.
S.K. Bal

H.M.
G.H.S.
S.K. Bal

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE Allocation of periods of leave on average; pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
				Nature and duration of leave taken	Period	Govt. to which debitable	
				رغبت کی نوعیت و عرصہ	عرصہ	کون سا حکومت	
<p>General Head Master Govt. High School Mamaab Koc Bannu</p> <p>TESTED Attesting Agency Court Bannu No. 777</p>	<p>15/83</p>	<p>Terminated Head Master Govt. High School Mamaab Koc Bannu.</p>	<p>27-1-83</p>	<p>15-5-83</p>	<p>Appointed against SV Post vide DDE (S) DT. Khan Divn. DT. Khan Endst. No: 1563-66/A-6/CF/BXW-2-25-1-83</p>	<p>General Head Master Govt. High School Mamaab Koc Bannu</p>	<p></p>
<p>General Head Master Govt. High School Mamaab Koc Bannu</p>	<p>5/15/83</p>	<p>Terminated Head Master Govt. High School Mamaab Koc Bannu.</p>	<p></p>	<p></p>	<p>Service terminated vide DDE (S) D.I. Khan Divn. DT. Khan Home No: 667R/AE-VII/F-A-84, dt 8/5/1983</p>	<p>General Head Master Govt. High School Mamaab Koc Bannu</p>	<p></p>
<p>General Head Master Govt. High School Mamaab Koc Bannu</p>	<p>21-4-84</p>	<p>Resignation of Khair Khan sv accepted from 21-4-84 vide DDE (S) DT. Khan Divn. DT. Khan Endst. NO: 5519-23/AE-VII/F-A dated 14-4-1984</p>	<p></p>	<p></p>	<p>Appointed against SV Post vide DDE (S) DT. Khan Divn. DT. Khan Endst. NO: 15593-63 Dated 8-11-83</p>	<p>General Head Master Govt. High School Mamaab Koc Bannu</p>	<p></p>

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Handwritten signature 'F.B.' at the top center of the page.

Handwritten signature 'V' at the top right of the page.

ATTESTED

9
 Copying Agency
 Lower Court Bannu

2	3	4	5	6	7	8	
Name of post	Whether substantive or officiating, and whether permanent, or temporary	If officiating, state (i) substantive appointment or (ii) whether for vacation under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
CT S.H.S. Dalozai Bannu	off/Temp	B.P.S. 9	Rs 620	Rs 29	1200 (C.T.)	31/8/85	Rauf Niaz
CT S.E.T (497) F.H.S. Thermala	off/Temp	Provisional pay fixed in B.P.S. No. 9	Rs 830	38	1590 vide Finana Deptt. Letter No. FDLPR/1-187-VIII dt. 22-7-87 on point to point basis.	1/8/87	Rauf Niaz
- Do -	off/Temp	B.P.S. No. 15	1165	71	2585	9/9/88	Rauf Niaz
- Do -	off/Temp		1236	35		11/12/87	Rauf Niaz
- Do -	off/Temp		1307	37		12/90	Rauf Niaz
			Pay provisionally fixed in BPS-15				
			Scale 15: - 1620 - 131 - 3585				
SE.T (497) Thermala	off/Temp		1892	pm	X	1/6/91	Rauf Niaz
			Pay provisionally fixed in BPS-16				
			Scale 16: - 1975 - 146 - 4065				

Signature of
 the
 Officer
 attesting
 the
 copy

CP. Off
 GHS Lab

H.M.
 GHS Lab

Govt.
 Ghorina

Govt.
 Ghorina

Govt.
 Ghorina

ATTESTED

Copy to Agency
Lower Court Bannu
7/27

(3)

ING

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and Duration of leave taken	Allocation of periods of leave on average of four months for earned leave (not exceeding 120 days) which have accrued and is debitable to another Government.	Reference to any recorded particulars of the leave taken
<i>[Signature]</i> Headmaster GHS Laloza Bannu	30/11/89	Incr 30/11/89	<i>[Signature]</i> H.M. GHS Laloza (Bannu)	Appointed against C.T. Post vide D.O. (S) Dt. Khan Duan Dt. Khan Endst. No 12439-436-3 Correspondance SET/Bxu dated 20.8.85	Govt. to which debtible Korolmit Dum ala Bannu	Reference to any recorded particulars of the leave taken
<i>[Signature]</i> Headmaster GHS Laloza Bannu	30/11/89	Incr 30/11/89	<i>[Signature]</i> H.M. GHS Laloza (Bannu)	Appointed against C.T. Post vide D.O. (S) Dt. Khan Duan Dt. Khan Endst. No 12439-436-3 Correspondance SET/Bxu dated 20.8.85	Govt. to which debtible Korolmit Dum ala Bannu	Reference to any recorded particulars of the leave taken
<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	30/11/89	Incr 30/11/89	<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	Appointed against C.T. Post vide D.O. (S) Dt. Khan Duan Dt. Khan Endst. No 12439-436-3 Correspondance SET/Bxu dated 20.8.85	Govt. to which debtible Korolmit Dum ala Bannu	Reference to any recorded particulars of the leave taken
<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	30/11/89	Incr 30/11/89	<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	Appointed against C.T. Post vide D.O. (S) Dt. Khan Duan Dt. Khan Endst. No 12439-436-3 Correspondance SET/Bxu dated 20.8.85	Govt. to which debtible Korolmit Dum ala Bannu	Reference to any recorded particulars of the leave taken
<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	30/11/89	Incr 30/11/89	<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	Appointed against C.T. Post vide D.O. (S) Dt. Khan Duan Dt. Khan Endst. No 12439-436-3 Correspondance SET/Bxu dated 20.8.85	Govt. to which debtible Korolmit Dum ala Bannu	Reference to any recorded particulars of the leave taken
<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	30/11/89	Incr 30/11/89	<i>[Signature]</i> Principal GHS Ghoriwala (Bannu)	Appointed against C.T. Post vide D.O. (S) Dt. Khan Duan Dt. Khan Endst. No 12439-436-3 Correspondance SET/Bxu dated 20.8.85	Govt. to which debtible Korolmit Dum ala Bannu	Reference to any recorded particulars of the leave taken

1.23
2/11
one month
90/628/91 (2-24)
8-X326/49

Service Verified
From 31-8-85 to 30-11-85
From the Acquittance Roll
& other Office record
[Signature]
Headmaster
GHS Laloza Bannu

1 Name of post نوم ملزمت	2 Whether substantive or officiating and whether permanent or temporary حاضری یا مستعمل یا قائم مقام	3 If officiating, (a) substantive appointment or (ii) whether service counts for pension under rule 3.26 of C.S.R. (P.N. volume I) اگر حاضری ہے تو کیا وہ رول 3.26 مطابق بننے کا مستعمل ہے؟	4 Pay in substantive post تنخواہ بطور حاضری ملازمت	5 Additional pay for officiating راند تنخواہ بطور قائم مقام	6 Other allowances falling under the term "pay" مانوالے تنخواہ دیگر الاانس	7 Date of appointment تاریخ تقرری	8 Signature of Government servant دستخط سرکاری ملازم
G.M.S. Gujriwala S.E.T. Post	off / temp		RS. P. 2021/- PM			1/6/91	Kaufman
do	do		2167/- PM			1/12/91	Kaufman
do	do		2313/- PM			1/12/92	Kaufman
do	do		2459/- PM			1/12/93	Kaufman

ATTESTED
 Copy to Agency
 -over to Bannu
 20/7/77

Signature of the officer
 Attest of the officer
 Date
 help
 S. Gujriwala
 ANNU
 do
 help
 GBS, C
 (B.A.)

11 FEB 14

9	10	11	12	13 LEAVE		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and Duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other Attesting officer	Reference to any recorded punishment, censure, reward or other Government servant
					Period	Govt. to which debitable	
<p>Principal GHS Ghoriwala (Bannu)</p> <p>Principal GHS S. Skindar Khal Bala BANNU</p>	<p>25/9/95</p> <p>transfer</p>	<p>transfer</p>	<p>Principal GHS Ghoriwala (Bannu)</p> <p>Principal GHS S. Skindar Khal Bala BANNU</p>	<p>31/8/1988</p>	<p>Govt. to which debitable</p>	<p>Principal GHS Ghoriwala (Bannu)</p> <p>Principal GHS S. Skindar Khal Bala BANNU</p>	<p>Reference to any recorded punishment, censure, reward or other Government servant</p>
<p>Principal GHS Ghoriwala (Bannu)</p> <p>Principal GHS S. Skindar Khal Bala BANNU</p>				<p>Appointed against pay and conditions at R.H.S. Ghoriwala (Bannu) vide D.D.E (S) D.O. Khan. Delegation D.O. Khan. Order No. 1622-28/AB-III/625 dated 31/8/1988.</p> <p>Passed one year prescribed Programme of Vocational Teacher Training held by the N.O.S.F.P. Board of Technical Education in 11 month of Feb, 1987 and Secured 1078/200 marks placed in grade "C".</p> <p>Result declared on 22/2/88.</p>		<p>Principal GHS Ghoriwala (Bannu)</p> <p>Principal GHS S. Skindar Khal Bala BANNU</p>	
<p>ATTESTED</p> <p>Copy ing Agency Over Court Bannu</p> <p>20777</p>				<p>(7) Service wiped off 13-3-91 to 31-8-95 from HR Roll and office record</p>		<p>Principal GHS Ghoriwala (Bannu)</p> <p>Principal GHS S. Skindar Khal Bala BANNU</p>	

2	3	4	5	6	7	8	9
Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb. volume I)	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term 'pay'	Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other Attesting Officer in attestation of column 1 to 8
SEPT Post S.H.S. Sik Bala	Officer	RS. P. 2751/PM	438	2751/PM 3rd class on MA	31/95	Rampal Singh	Principal Sik Bala
do	do	Rs. 2882/PM	GHSS	1/95	Rampal Singh	GHSS	Principal
do	do	Rs. 4111/PM	12/94	Rampal Singh	12/94	Rampal Singh	Principal

Revised Entries - B-16 (2535-197-5490) (11875/146-4065)

Revised scales w.e.f. 1-6-94 - BPS-16
B-16 (2535-197-5490)
Pay fixed provisionally.

ATTESTED
Copying Agency
Govt. Court Bannu
2-7-77

8	9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
<p><i>did that ...</i></p> <p><i>120L</i></p> <p><i>5 Months + 09 days</i></p> <p><i>31-8-85</i></p> <p><i>31-7-98</i></p> <p><i>Govt. Higher Secy. School Bannu</i></p>	<p><i>MAY 102</i></p> <p><i>8</i></p> <p><i>1988 EN</i></p>	<p><i>Post debarred</i></p> <p><i>Govt. Higher Secy. School Bannu</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>Govt. to which debitable</i></p> <p><i>Period</i></p> <p><i>13</i></p>	<p><i>Verified</i></p> <p><i>31-7-98</i></p> <p><i>Govt. Higher Secy. School Bannu</i></p>	<p><i>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</i></p>

Confirmation/Approval

Approved vide Selection Committee held on 27-6-98 wef taking over charge against SET (Agstl.) BP wef 1-9-1988, vide DSE. N/A/P/PE

Ends. No. -2907.15/A-E-14/S

Dated Peshawar the 17/98

[Signature]

Govt. Higher Secy. School Bannu

ATTESTED

Accounting Agency
Lower Court Bannu

[Signature]

25/11/7



**OFFICE OF THE
DISTRICT ACCOUNTS OFFICER
BANNU**

FAX/PHONE NOs 0928-9270030 & 68

No.DAO/BU/Admn-II/Post Office/2017-18/

Dated: 25/07/2017

To

Mr. Rauf Niaz,
Ex. SET at GHS S.K BALA,
BANNU.

Subject: UNTAINED SERVICE INCREMENTS ON SET POST WEF 14.04.1979.

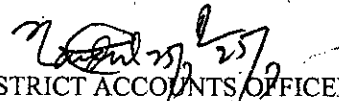
Memo:

Kindly refer to your application Dated 21.03.2017 for grant of annual increments of untrained service on SET post wef 14.04.1979.

As per this office record the applicant has resigned from service wef 21.04.1984 vide letter NO:6519-23/AE VIII/A Dated 14.04.1984.

- 1) Meanwhile the applicant has been appointed as SV post dated:25.01.1983 up to 30.08.1985.
- 2) The applicant again appointed on CT post vide letter No:12439-43/C-3/Corrsp/SET/BU Dated 20.08.1985 up to 31.08.1988.
- 3) On 31.08.1988 the applicant once again appointed against SET (Agri) Post vide E/NO:1622-28/AE-III/625 Dated 31.08.1988.

~~Now~~ The benefits of untrained service is admissible only when the teacher concerned have been trained on the same post.


DISTRICT ACCOUNTS OFFICER
BANNU

نیشنل ادارہ اور استیع طلب
(حکم 5 قواعد 1 دیکھو ضابطہ موافق)

XII - 5

سرمدیوں صدر اوف سٹاز نام

نیشنل نام (5) ڈیسٹرکٹ اکاؤنٹ افسس ضلع بٹوں

مددِ مکی

میرٹھ کے لئے آپ کے خلاف ایک مقدمہ جسکے عرضی دعویٰ کی نقل لف ہوا ہے۔ ثابت
اور ایامات سے ایذا پذیر نہیں ہوا آپ کو ہدایت کفایت ہے۔ کہ بتاریخ 20 مارچ 11 بوقت
8:00 بجے اساتذہ یا دیگر تہذیبوں کے جو آپ کی جانب سے داخل ہدایات رکھتا: داور دعویٰ سے متعلق تمام ضروری سوالات کا جواب دے سکتا ہو یا
جسکے ہمراہ کوئی ایسا شخص: جو ذریعے سوالات کا جواب دینے کے قابل ہو حاضر عدالت ہو کر دعویداری کی جوابدہی کرتے۔ آپ کو مزید ہدایت
کیجاتی ہے کہ بتاریخ مذکورہ وہ تمام دستاویزات جن پر آپ اپنے دفاع میں انحصار کرنا چاہتے ہیں پیش کرے۔ نیز بتاریخ مذکورہ یا اسے قبل اپنا
جواب دعویٰ داخل کرے۔ واضح ہو کہ بتاریخ مذکورہ آپ کی عدم حاضری کی صورت میں مقدمہ آپ کی غیر موجودگی میں سماعت اور فیصلہ کی جائے
گی۔

آن تاریخ 27 10 2017 بتاریخ 10 27 18

Mr. Tahir 63
(12/3/10/07)

سول جج XII بٹوں

تاریخ 28/1

(نوٹ) یاد رکھو ضابطہ اندر 7 پر عمل کر کے بتاریخ 5/11 داپس کرے۔

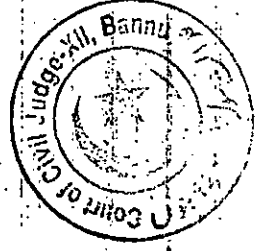
تاریخ جس پر داپس کیا

Mr. Farooq
3/1/10

Edw:

ANQ (pa-II)

31-X-2017



اعداد حساب کنندگی درج و با معن مزن

روزهای جاری و در حد آمار کنندگی درج و معن مزن — روز

نام

(۱) سند رسمی و سند رسمی (محرکت صدور سند غیر فراه شماره

(۲) اما در سند صدور صورت سند غیر فراه شماره

(۳) در سند رسمی و سند رسمی (محرکت سرپر ۲۲ شماره

(۴) در سند رسمی (محرکت سند در انجمن مزن

(۵) در سند رسمی (محرکت سند معن مزن

در کلاس

و دعوی علیه درستی و اعتبار در این صورت که در معن مضمین معن SET می باشد

روز ۱۴/۴/۱۹۷۹ Appoint مرخصی است. در آن معن مضمین مکتوب است

روز در معن مضمین ۲۰۰۲/۵-۲/۵ FD(PRC) ۳۰/۱۰/۲۰۰۹

مبنای در پیوست Annual Increment/Running pay از تاریخ

Appoint روز ۱۴/۴/۷۹ تا حال در این است که در معن مضمین

قرار در این است. در معن مضمین در معن مضمین در معن مضمین

در معن مضمین ۲/۱۵/۱۷ - معن مضمین در معن مضمین

در معن مضمین ۲۵/۷/۱۷ DAO/BU/Ann-II/2017-18

کو خارج کر کے داخلہ کر دیا۔ آخر میں صدر سندھ ناچار ہو کر مزاحمت نہ کر سکا۔
 خلاف کاروں۔ خلاف واقعات۔ خلاف روزناموں اور پریس۔ ملازمین۔ ملازمین۔
 سینئر پریس مینیجر (منازعتی) مہینے میں صرف 25 $\frac{7}{17}$ کے عرصے میں قابل دسترس رہے۔
 مسجون مراد۔ اور عدلی کو از مارچ Appointment انڈیکٹ کر کے عدلیہ کے لئے
 جاری۔ عدلیہ میں خلاف کے تمام عملے کو صرف کر کے۔

ب۔ دعویٰ میں ڈپٹی ایجوکیشن آفیسر کے دوران عدلیہ میں مقرر کر کے
 کر کے دیا جا رہا ہے کہ وہ عدلیہ کے عدلیہ کے لئے 25 $\frac{7}{17}$ کو از فور مسجون
 کر کے عدلیہ کو سالانہ انڈیکٹ از مارچ Appointment جاری کر کے۔
 عدلیہ میں خلاف کے تمام عملے کو صرف کر کے۔

مالت مقدمہ عدلیہ میں (صیغہ ریمو) کے لئے
 1۔ مئی 2007ء
 2۔ مئی 2007ء

مالت مقدمہ عدلیہ میں
 1۔ مئی 1997ء
 2۔ مئی 2007ء

حاجب عالی، دعویٰ عدلیہ میں

- 1) عدلیہ میں عدلیہ کے لئے 23 $\frac{23}{24}$ سال تک عدلیہ کے مقدمے میں واسیہ رہا۔
 اور 6 $\frac{6}{09}$ کو عدلیہ میں SET میں رٹیا کر کے رکھا گیا۔ نقل شدہ ہے۔
- 2) عدلیہ میں عدلیہ کے لئے Appointment کے لئے 14 $\frac{7}{99}$ کو عدلیہ میں۔
 Untrained Teacher تھا۔ اور عدلیہ میں ان کا فی حلف کر کے رکھا گیا۔

FD(PRC) 5-2/2002 سے متعلقہ حکم (NSRF) KP میں (NSRF) کے تحت

Annual Increment/Running pay Untrained $30 \frac{10}{09}$

بھارتی سرکار کے زیر نگرانی Grant کیا۔ اور یہی طریقہ حکم ہے

All those Untrained Teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.

سارے تعلقہ میں مذکورہ ہے

(14) یہی حکم ہے کہ ان کے Increment مذکورہ ہوگا۔ کوئی بھی
درخواست فرم $15 \frac{2}{07}$ تدارک کے حکم کے تحت یہی حکم نافذ ہوگا

Increment کا اظہار کرنا واجب ہے۔ تعلقہ درخواست ہے

(15) یہی حکم ہے کہ درخواست مذکورہ کے مطابق اس کے تحت اس کے مطابق
سیٹ $25 \frac{7}{07}$ DAO/BU/Admn II/2017-18 کے تحت یہی حکم نافذ ہوگا

کو خارج کر کے یہی حکم نافذ ہے

(16) یہی حکم ہے کہ یہی حکم نافذ ہے کہ یہی حکم نافذ ہے
Increment $30 \frac{10}{09}$

مذکورہ کے تحت یہی حکم نافذ ہے کہ یہی حکم نافذ ہے
appointment کے $14 \frac{7}{79}$ کے تحت یہی حکم نافذ ہے

صدور قدر دریا جاری - اور تم نے $\frac{5}{17}$ روپیہ $25 \frac{7}{17}$ میرا خرچہ کیا۔ تاہم
 جو وصافہ - خلاف قاری - خلاف واقعات - خلاف دراز و زبرد - خلاف
 کے اختیار - میں برہمیتی و عداوت میں میرے حقوق قدریں پر بند و ترو و قائم ہے اور
 قابل مستحق ہے - اور میری Increment قدر کا قابل اجراء ہے

(۲) یہ کہ وہ کہیں کو باہر لائیں - تا وہ میری Increment قدر کو جاری رکھ
 شدہ اولیٰ مال قبول کرتے رہے۔ اس پر میری نصیب سے صرف القاری میں
 اس سے دعویٰ کیا جائے کہ ان کی ضرورت لائق میری ہے

(۳) یہ کہ دعویٰ میری کو از قریب $25 \frac{7}{17}$ روپیہ میرے ساتھ از صاف القاری علیہم
 فرمایا ہے۔ جس سے میری تمام حق ادا ہو گیا ہے۔ جس سے میری تمام حق ادا ہو گیا ہے
 کو حاصل ہے

(۴) یہ کہ میری قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے
 میرا اختیار ہے کہ وہ میری نصیب سے میری تمام حق ادا ہو گیا ہے
 میری تمام حق ادا ہو گیا ہے

میرے حق قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے	$25 \frac{10}{17}$
میرے حق قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے	$25 \frac{7}{17}$
میرے حق قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے	$25 \frac{10}{17} - 25 \frac{7}{17} = 25 \frac{3}{17}$

میرے حق قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے
 روپیہ سب سے - میری
 روپیہ سب سے

میرے حق قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے
 روپیہ سب سے - میری
 روپیہ سب سے

بند و ترو و قائم ہے اور
 میرے حق قدر پر نقدی اور اس میں و اختیار میری تمام حق ادا ہو گیا ہے

3
میں عرض قرار داد امور تنفیج طالب
(حکم 5 قواعد 1، 2، 3، 4، 5، 6، 7، 8، 9، 10، 11، 12، 13، 14، 15، 16، 17، 18، 19، 20، 21، 22، 23، 24، 25، 26، 27، 28، 29، 30، 31، 32، 33، 34، 35، 36، 37، 38، 39، 40، 41، 42، 43، 44، 45، 46، 47، 48، 49، 50، 51، 52، 53، 54، 55، 56، 57، 58، 59، 60، 61، 62، 63، 64، 65، 66، 67، 68، 69، 70، 71، 72، 73، 74، 75، 76، 77، 78، 79، 80، 81، 82، 83، 84، 85، 86، 87، 88، 89، 90، 91، 92، 93، 94، 95، 96، 97، 98، 99، 100)

XII - 11

نمبر و عنوان مقدمہ اوفٹ نیا نام سکریٹری
نوش نام (5) ڈسٹرکٹ ایگزیکیوٹو ایفیسر ضلع بنوں

ہر گاہ کہ مدعی نے آپ کے خلاف ایک مقدمہ جسکے عرضی دعویٰ کی نقل لف ہوا ہے۔ بابت
11 20 تاریخ 2017ء کو پیش کیا گیا ہے۔ کہ تاریخ 20 11
8:20 بجے اساتذہ پیر ایجوکیشنل جو آئی جاب سے واضح ہدایت رکھتا ہوا اور دعویٰ سے متعلق تمام ضروری سوالات کا جواب دے سکتا ہو یا
جسکے ہمراہ کوئی ایسا شخص ہو جو ایسے سوالات کا جواب دینے کے قابل ہو حاضر عدالت ہو کر دعویٰ پوری کی جا رہی ہے۔ آپ کو مزید ہدایت
کیجاتی ہے کہ تاریخ مذکورہ وہ تمام دستاویزات جن پر آپ اپنے دفاع میں انحصار کرنا چاہتے ہیں پیش کرے۔ نیز تاریخ مذکورہ یا اسے قبل اپنا
جواب دعویٰ داخل کریں۔ واضح ہو کہ تاریخ مذکورہ آپ کی عدم حاضری کی صورت میں مقدمہ آپ کی غیر موجودگی میں سماعت اور فیصلہ کی جائے
گی۔

آج تاریخ 27 10 2017ء کو پیش کیا گیا۔

نمبر 187
تاریخ 28/10

Mr. Tahir Us
(47/31/10/017)
XII بنوں

(نوٹ) پیادہ ضابطہ اندر 7 پر پیش کر کے تاریخ 5/11 واپس کرے۔

تاریخ جس پر واپس کیا

Mr. Kanooq
31/10

Edw:
31-X-2017



اعداد حساب کنندہ کی شرح و ماہ نامہ میں

یہ تمام تفصیلات اس وقت تک نہیں دی گئی ہیں۔

تمام

(1) اسٹیٹ بینک آف پاکستان اور دیگر بینکاری تنظیموں کے صدر صدر کے لئے فراہم کیا گیا ہے۔

(2) ان کے لئے صرف ایک ہی فراہم کیا گیا ہے۔

(3) ڈیپارٹمنٹ آف ایڈمنسٹریشن اور دیگر تنظیموں کے سربراہان کے لئے فراہم کیا گیا ہے۔

(4) ڈیپارٹمنٹ آف ایڈمنسٹریشن اور دیگر تنظیموں کے سربراہان کے لئے فراہم کیا گیا ہے۔

(5) ڈیپارٹمنٹ آف ایڈمنسٹریشن اور دیگر تنظیموں کے سربراہان کے لئے فراہم کیا گیا ہے۔

درج ذیل

و۔ دعویٰ شدہ ڈگری اور دیگر اہلیتوں کے بارے میں تفصیلی رپورٹ SET میں

روز 14/4/1979، Appoint اور دیگر تفصیلات۔ اور دیگر تفصیلات کا نمبر ہے۔

اور دیگر تفصیلات کے بارے میں 2002-5-2/5-2/2002 FD(PRC) اور دیگر تفصیلات کا نمبر ہے۔

مبنیٰ ڈیپارٹمنٹ Annual Increment/Running Pay اور دیگر تفصیلات

Appoint اور دیگر تفصیلات 14/4/79 اور دیگر تفصیلات کا نمبر ہے۔

اور دیگر تفصیلات کے بارے میں۔ اور دیگر تفصیلات کے بارے میں اور دیگر تفصیلات

اور دیگر تفصیلات کے بارے میں 15/2/017 اور دیگر تفصیلات کے بارے میں اور دیگر تفصیلات

اور دیگر تفصیلات کے بارے میں 25/7/017 اور دیگر تفصیلات کے بارے میں اور دیگر تفصیلات

کو خارج کر کے دیا گیا۔ (جو) سید احمد علی۔ ناچار۔ خود ملاحظہ۔ من گھڑت۔
 خلاف کاروں۔ خلاف واقعات۔ خلاف روزگار اور شہرت۔ ملحد اور۔ ملحد اختیار۔
 سید میر یحییٰ و عازمی میر یحییٰ سید محمد عرفان $25 \frac{7}{17}$ قدر عزیز قابل سفر و حضر ہے۔
 مستوح مرد۔ اور مدعی کو از تاریخ Appointment انڈیکٹ شدہ عمر (دوران)
 جاری۔ من گھڑت اور خلاف درحکم علیہ صورت شدہ۔

ب۔ دعویٰ میں ڈگری اعزاز حکم انتہائی دوران و زمانہ میں بہت کم عمر میں
 کو حکم دیا جائے کہ وہ ملحد و عینہ کار کی سید محمد عرفان $25 \frac{7}{17}$ کو از خود مستوح
 کر کے مدعی کو سالانہ انڈیکٹ از تاریخ Appointment جاری کر کے
 من گھڑت اور خلاف درحکم علیہ صورت شدہ۔

ماہیت مقدمہ لڑنے (اختیار رہتا ہے)	ماہیت مقدمہ لڑنے کو رٹ میں
ا۔ سہ ماہی 2007	ا۔ سہ ماہی 19/11/07
ب۔ سہ ماہی 2007	ب۔ سہ ماہی 2007

حاجب عالیہ دعویٰ مدعی و مدعیہ

- (1) ایک مدعی حکمہ تعلیم میں مرصدا کر گیا $\frac{23}{24}$ سال تک تدریس کے مقصد سے وابستہ رہا۔
 اور 6/09 کو بطور SET پیکر رہا اور مرصدا کیا۔ نقل نشینت کی و
 بہرین تک رہا۔ مدعی کو Appointment کے 14/7 کو مرصدا کیا۔
- (2) ایک مدعی Untrained Teacher تھا۔ اور حکمہ تعلیم کو کا فی خدمت کر دیا۔

FD(PRC) 5-2/2002 سے متعلقہ حکم (NSRP) K.P. میں

Untrained 30 ¹⁰/₀₉ Annual Increment/Running pay

Grant کیا اور یہی طریقہ عمل ہے

All those Untrained Teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring/completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.

سارے تعلقہ میں مذکور ہے

4) یہی وہی ہے جسے Increment مذکورہ درجہ 5 کو فوری

درخواست فرم 15 ²/₀₁₇ تدارک سے ملی اور بقیہ تعلقہ میں حاصل ہوگا

Increment کا اظہار کرنا ہے۔ تعلقہ درخواست ہے

5) یہی وہی ہے درخواست مذکورہ پر کارروائی کرتے ہوئے اس کے مطابق

سینئر 18-2017/DAO/BU/Admn II سے 25 ⁷/₀₁₇ درخواست فوری

کو خارج ہوتے ہوئے والیہ کیا۔ تعلقہ میں ہے

6) یہی وہی ہے جسے Untrained 30 ¹⁰/₀₉ Increment

مذکورہ کا ارتقاء appointment سے 14 ⁷/₇₉ ہے۔

صدر دفتر دارالخارجہ - اورج نمبر 25⁷/₁₇ 917 سہ ماہیہ - ناچار
 جو دماغہ - خلاف قانون - خلاف واقعات - خلاف اور فرور پوریشن - ملازم اور
 ملازمین - منہ پر برہمنی و مدار میں مینے حقوق میں ہر بندہ فرور پوریشن کے اور
 قابل منور ہے - اور دعویٰ کے Increment قدرے قابل اجراء ہے

(7) برج ملازم کو باہر ہٹائی - تا وہ دعویٰ کے Increment قدرے جاری ہو
 شدہ اور قابل قبول کرتے رہے - اس پر عدالت فیصلہ سے صاف انکار میں
 اسنے دعویٰ صفا دائر کرتے ان ضرورت لائق میں ہے

(8) اس سبب دعویٰ کو اور فرور 25⁷/₁₇ جیکہ سبب سے سماعت از صاف انکار ملازم
 عدالت فیصلہ تمام میں ہوا ہے - جس سے سماعت کا اختیار عدالت درال منہ میں
 کو حاصل ہے

(9) اس سبب سے عدالت نے فرور صفت و اختیار سماعت عدالت درج لہذا اس دعویٰ ہے
 لہذا اس سبب سے عدالت نے فرور صفت و اختیار سماعت عدالت درج لہذا اس دعویٰ ہے

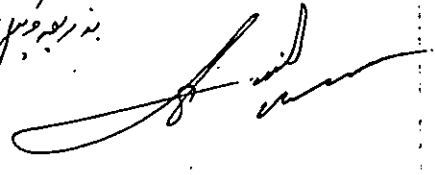
25 ¹⁰ / ₁₇	25 ¹⁰ / ₁₇
2017	2017
روفا سباز	روفا سباز
روفا سباز	روفا سباز

25.10.2017

روفا سباز - دعویٰ

روفا سباز

بذریعہ دفتر مشرفہ شعبہ قانونی



12. That the impugned Notification is against the law and facts of the case.

13. That the appellant is entitled for the grant of advance increment as per decision of honorable Supreme Court of Pakistan.

Factual Reply: -

1. That the Para No. 1 needs no reply.
2. That Para No. 2 of the reply is incorrect as the order passed by the respondent No. 5 is against the law facts and circumstances of the case Hence the appellant approached this Honorable Tribunal for this redressal.
3. That Para No. 3 The Instant appeal is filed by the appellant as per direction of the learned Civil Judge.

Grounds: -

- i. Reply to the ground No. I the impugned order passed by the respondent No. 5 is against the law facts and without Jurisdiction. Because the appellant served the respondent deptt since 14-04-1979 to 30-10-2009 and during that period the appellant obtained master decree as well as Diploma in vocational Training in session 1987 therefore the petitioner is entitled for the grant of annual increment in the light of judgment of the Supreme Court of Pakistan.
- ii. Para No. II is incorrect the order of the resignation of the appellant was withdrawn and that very period was considered leave without Pay. (Relevant Documents are attached)
- iii. Para No. III of the Reply is incorrect, unlawful as per order of the divisional director of education (school) Division D.I Khan endorsement No. 102-5 dated 02-01-1986 the resignation under no 6519-23/AE-VII/1-A dated 14-04-1984 in respect of appellant was granted extraordinary leave without pay for the period mentioned in above said order (copy attached)


iv. Para No. IV needs no reply.

In View of the above submission and on acceptance of the instant appeal/rejoinder the order dated 25-07-2017 may kindly be set-aside and the appellant may kindly be granted annual increment Since 1979 till date.

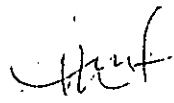
Appellant

Rauf Niaz

Through:


Umar Nasir Advocate

High Court Peshawar


Muhammad Hayat Advocate

High Court Peshawar

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Serial No. GU 01494

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P.) PAKISTAN



(Session 1993)

RAUF HIAZ

SON

of

MIR MUHAMMAD AYAZ

and

a student of the BANNU DISTRICT

having passed the prescribed examination in APRIL/MAY 1993

is this day admitted by the Gomal University to the DEGREE of

MASTER OF ARTS

in the THIRD Class

The subject of examination being ISLAMIYAT

The Examination was taken as a whole/in parts.

Registered No. 282-GUMP-89

Roll No. 1802

31st OCTOBER, 1993.

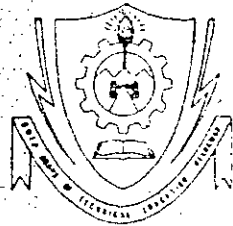
Countersigned

Controller of Examinations

Attested
Gazetted Teaching Staff
H.S. S.K. Bala
Ramu

Vice-Chancellor

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Str. No. 0101

Roll No. 3

N.W.F.P. BOARD OF TECHNICAL EDUCATION PESHAWAR

DIPLOMA IN VOCATIONAL TEACHER TRAINING
SESSION 1937
ANNUAL

This is to certify that Mr./Miss/Mrs. RAUF NIAZ

Son/Daughter of Mr. MIR HUSAIN D. SYAZ KHAN

Registered No. ATPV/E/66-116 of the Government Agro Technical Teachers Training Centre, Peshawar, has successfully completed the one year prescribed programme of Vocational Teacher Training and has passed the Examination held by the N.W.F.P. Board of Technical Education, in the month of FEBRUARY, 1937 and secured 1078/2000 & "C" Grade.

The Candidate has qualified in the following field.

1. Industrial Arts
2. Agriculture
3. Home Economics
4. Commerce

In recognition thereof, this Diploma is awarded to him/her on the 22nd day of FEBRUARY, at Peshawar.

This Diploma is Issued without any erasing/over writing.

SECRETARY

Dated Peshawar 22.2 1937

Attested
G.H.S. S.K. Bala
Bannr

CHAIRMAN

1

1. Name _____ (نام)

Mr. Rauf Niaz Khan
Pakistani / Islam

2. Nationality and Religion _____ (قومیت اور مذہب)

3. Residence _____ (مستقل رہائش)

Village: Basia Khel, B. Amroza
Dist: Bahawalpur

4. Father's name and residence _____ (والد کا نام اور رہت)

Mir Muhammad Ayyaz

5. Date of birth by Christian era as nearly as can be ascertained _____ (تاریخ پیدائش مطابق سن عیسوی)

5-6-1949

(Fifth June, N.H. & Forty Nine)

6. Exact height by measurement _____ (قد و قامت)

6-6

7. Personal mark for identification _____ (شان شناخت)

Scars on four hand

8. Left hand/right hand thumb and finger-impressions of (None-gazetted) officer. (مردی صورت میں بالوں اور صورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھنگیا)

Ring Finger (چھنگیا کے ساتھ کی انگلی)

Middle Finger (انگشت میاں)

Fore Finger (انگشت شہادت)

Thum (انگولہ)

9. Signature of Government servant _____ (سرکاری ملازم کے دستخط)

Rauf Niaz

10. Signature and designation of the Head of the Office, or other Attesting Officer _____ (تصدیق کنندہ سر کے دستخط اور مہر)

10/5/53

Attested
Principal
Basia Khel Bala

Note :- The entries in this page should be renewed or re-attested at least every five years and the signatures lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule. اس ضلع کے مندرجات کم از کم ہائے سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9-10 میں دستخطوں کے لیے تاریخ ہونی چاہیے۔ انگلیوں کے نشانات کیلئے ہر ہائے سال کے بعد تصدیق کی ضرورت نہیں۔

91
10
1993

1972

1 Name of post درجہ ملازمت	2 Whether substantive or officiating and whether permanent or temporary عارضی و مستقل یا قائم مقام	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے؟	4 Pay in substantive post تنخواہ بطور عارضی ملازمت		5 Additional pay for officiating زائد تنخواہ بطور قائم مقام		6 Other emoluments falling under the term "pay" مانگوائے تنخواہ دیگر الاصلی	7 Date of appointment تاریخ ترقی	8 Signature of Government servant دستخط سرکاری ملازم
S.V. GHS Mamursh J/Temp Khel (Band)			RS. P.	RS. P.			27/11/1983	Kamran	
S.V. GHS Mamursh J/Temp Khel (Band)		P. 620-29-1200	620/-	P. Fixed	J.P.S-4		16/11/1982	Kamran	

9	10	11	12	13 LEAVE		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>تاریخ الطاع ملازمت</p>	<p>وجوهات الطاع ملازمت لرلی و تبادلہ یا بر طری</p>	<p>دستخط السر مجاز</p>	<p>رضعت کی نوعیت و مدت</p>	<p>حار ماہ لکھی کیلئے توسط تنخواہ کا لین Period روز</p>	<p>دستخط السر مجاز</p>	<p>مجازاً جریا یا غیر مناسب کار کوئی کا ریکارڈ</p>
<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>27-1-83</p>	<p>Terminated</p>	<p><i>Abbas</i></p>	<p>15-5-83</p>	<p>Appointed against - S.O. Post vide DDE (S) D.T. Khan Dir. D.T. Khan Enrol. No. 1563-66/11-6/CE/BXW 2) 25-1-83.</p>	<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>Government High School Mamaab Kooi Bannu.</p>
<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>5/6/83</p>	<p>Terminated</p>	<p><i>Abbas</i></p>	<p>15-5-83</p>	<p>Service terminated vide DDE (S) D.T. Khan Dir. D.T. Khan Home. No. 6672/AE-VII/F.A-84, dt. 8/5/1983.</p>	<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>Government High School Mamaab Kooi Bannu.</p>
<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>16-11-83</p>	<p>Resignation of Raul Khan accepted from 21-4-84 vide DDE (S) D.T. Khan Dir. D.T. Khan Enrol. No. 6519-23/AE-VII/A-A dated 14-4-1984.</p>	<p><i>Abbas</i></p>	<p>16-11-83</p>	<p>Appointed against: S.O. Post vide DDE (S) D.T. Khan Dir. D.T. Khan Enrol. No. 15593-83 Dated 8-11-83.</p>	<p><i>Abbas</i> Head Master Mamaab Kooi Bannu.</p>	<p>Government High School Mamaab Kooi Bannu.</p>

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
نام پوسٹ ملازمت	حالی یا مستقل یا دائمی یا موقت	اگر عارضی ہے تو کیا وہ رول 3.20 کے مطابق پیش کیا جاتا ہے؟	تھووا بلور عارضی ملازمت	زائد تھووا بطور قائم مقام	بیسوال تھووا دیگر الاوسی	تاریخ تقرری	دستخط سرکاری ملازم
B.P.S. 9 Rs. 620-29-1200 (C.T.)							
C.T. GHS Lalozai Bannu	off/Temp		Rs. P. 620/-	Rs. P. 29/-		31/8/85	Rauf Niaz
Provisional pay fixed in B.P.S. No. 9 Rs. 830-38-1590 vide Finance Deptt. Letter No. FDLPR/21-187-VIII dt. 22-7-87 on parit to point basis.							
C.T. Post	off/Temp		Rs. 830/-			1/1/87	Rauf Niaz
B.P.S. No 15. 1165-71-2585							
S.E.T. (Agst) GHS S. Ghoriwala	off/Temp		1165/-	9 P. 33/-		1/9/88	Rauf Niaz
- Do -	off/Temp		1236/-	9 P. 35/-		1/12/89	Rauf Niaz
- Do -	off/Temp		1307/-	9 P. 37/-		1/12/90	Rauf Niaz
pay provisionally fixed in BPS-15							
Scale 15: - 1820 - 131 - 3585							
G.H.S. Ghoriwala S.E.T. Post	off/Temp		1892/-	PM		1/6/91	Rauf Niaz
pay provisionally fixed in BPS-16							
Scale 16: - 1875 - 146 - 4065							

Signature and designation of the Head of the office or other Attesting Officer in attestation of column 1 to 8
دستخط سرکار

CP: Ghoriwala
GHS Lalozai

Govt. Ghoriwala

Principal Officer

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office of other Attesting Officer	Nature and Duration of leave taken	Allocation of period of leave on average pay not exceeding four months (or earned leave not exceeding 120 days) to which leave salary is debitable to and hence Government	Reference to any relevant papers
<p><i>CP: Chongu</i> Headmaster GHS Lalozai Bannu</p>	<p>31.8.85 Promoted to at GHS Ghorwala Bannu</p>	<p>F.M. GHS. 21/4 Lalozai (Bannu)</p>	<p><i>[Signature]</i> Head Master Lalozai Bannu</p>	<p>رسخت کی نوعیت و مدت</p>	<p>APPOINTED AGAINST C.T. POST Vide P.D.E.L.S) D.K. Khan Divn. D.K. Khan Endst: No. 12439-43/c-3 Correspondance/SET/BXU Dated 20.8.85</p>	<p>مذاہب سرانامہ سابقہ کارکردگی کا ریکارڈ</p>
<p><i>[Signature]</i> Govt. Headmaster Ghorwala</p>	<p>30.11.84 Principals GHS</p>	<p>Incr 30.11.84</p>	<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p><i>[Signature]</i></p>	<p>1.23 2/11 one issue web 2/6 28/31 (2 st) 90 Amount 8 K 326/69</p>	<p><i>[Signature]</i> Headmaster GHS Lalozai Bannu</p>
<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p>30.11.90 Principals GHS</p>	<p>Incr 30.11.90</p>	<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>
<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p>31.5.91 Principals GHS</p>	<p>P-Rev. 31.5.91</p>	<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>
<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p>1.6.91 Principals GHS</p>	<p>Pr-Rev. 1.6.91</p>	<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>
<p><i>[Signature]</i> Principal GHS, Ghorwala (Bannu)</p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p><i>[Signature]</i></p>	<p>Service Verified From 31.8.85 to 30.11.85 From the Acquittance Roll & other Office record. <i>[Signature]</i> Headmaster GHS Lalozai Bannu</p>

1	2	3	4	5	6	7	8	9
Name of post دوره ملازمت	Whether substantive or officiating and whether permanent or temporary ہائری یا لائتم مقام	If officiating, (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Ph.) volume II اگر ہائری ہے تو کیا وہ رول 3.20 مطابق نیشن کا مستعمل ہے؟	Pay in substantive post تنخواہ بطور ہائری ملازمت	Additional pay for officiating زائد تنخواہ بطور لائتم مقام	Other payments falling under the term "pay" ماہوار تنخواہ دیگر الاؤس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم	Signature and designation of the Head of the office or other Attending Officer in attestation of columns 1 to 8 دستخط سرکار
SBT G.M. S Shorinwala S.E.T Post	off/Temp		202/- pm			1 6/91	Rauf Niazi	Principal G.M. S. Shorinwala (S.E.T.)
- do -	- do -		2167/- pm			1 12/91	Rauf Niazi	Principal G.M. S. Shorinwala (S.E.T.)
- do -	- do -		2313/- pm			1 12/92	Rauf Niazi	Principal G.M. S. Shorinwala (S.E.T.)
- do -	- do -		2459/- pm			1 12/93	Rauf Niazi	Principal G.M. S. Shorinwala (S.E.T.)

(7)

(4)

9	10	11	12	13	14	15
Signature and designation of the Head of the office of other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment تاریخ التظاع ملازمت	Reason of termination (such as promotion, transfer, dismissal etc.) وجوهات اللطاع ملازمت تاریخ، تبادلہ یا ہر طریقہ	Signature of the Head of the office of other Attesting Officer تصدیق التظاع مجاز	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رشتت کاملے اوسط انتظام کا لین Govt. to which debitable کونسلٹ جیسے رقم ادا ہوگی	Signature of the Head of the office of other Attesting Officer تصدیق التظاع مجاز	Reference to any record of punishment, suspension or other disciplinary proceedings مجاز یا ہر باہر مسابقت کارکردگی یا دیگر
Principal, GHS, Ghoriwala (DANNU)	30-11-91		Principal, GHS, Ghoriwala (DANNU)		2) Service Verified From 12-85 to 11-10-86 From Acquittance Roll & other Office record.	
Principal, GHS, Ghoriwala (DANNU)	30-11-92		Principal, GHS, Ghoriwala (DANNU)		3) Service Verified From 12-86 to 30-11-87 From the Acquittance Roll & other Office	
Principal, GHS, Ghoriwala (DANNU)	30-11-93	Suer.	Principal, GHS, Ghoriwala (DANNU)			
Principal, GHS, Ghoriwala (DANNU)	31-5-94	Pay Revision				
<p>CT. 1-12-87 K 31/88</p> <p>SET. 1-9-88 K 20/12</p>					4) Service Verified From 12-82 to 23-12-88 From the Acquittance Roll & other Office record.	

8	9	10	11	12	13		14	15
Signature of Head of Office or other Attesting Officer in attestation of columns 1 to 8	Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office of other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
					Nature and duration of leave taken	Govt. to which debitable		
					Period			
							<p>Service Verified</p> <p>From 11-12-58 to 31-8-91</p> <p>From the Acquittance Roll & other Office record.</p> <p>Head Master G. H. Lalozai (Bannu)</p> <p>Drawn Rs. 21/- as salaries on account of adhoc increase to civil employees w.e.f. 12-12-59 to 31-12-59 vide P.O. No. 1831 dated 23-1-90 and Rs. 62/- w.e.f. 1-12-59 to 31-12-59 vide P.O. No. 1830 dated 23-1-90 and Rs. 37/- w.e.f. 1-7-70 to 12-8-59 vide P.O. No. 1078 dated 10-2-</p> <p>Principal</p> <p>Govt. High School Bannu</p>	
							<p>(6)</p> <p>Service verified w.e.f. 1-9-58 to 12-3-91 from A/R and other office records</p> <p>Principal</p>	

Signature of Head of Office or other Attesting Officer in attestation of columns 1 to 8

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Handwritten notes in column 11:

As per order of 30/9/90 vide T-1687 dated 29/6/91

Handwritten notes in column 10:

As per order of 10/10/90 vide T-1688 dated 29/6/91

Handwritten notes in column 13:

Leave w.e.f. from 1-9-90 to 31-8-91 (Sanctioned) under Dist. Director of Edu (S) D. G. Khan assigned D.G. End St. No. 21676-79/A.P.-III/PP-625/SEF. dated 15/9/90 Detail is as under:

- w.e.f. 1-9-90 to 28-4-91 (210-days) on Half Pay
- w.e.f. 29-4-91 to 15-6-91 (48 days) without pay
- w.e.f. 16-6-91 to 31-8-91 (57 days) on full pay due to summer vacation on official P. reserved

Signature of Head Master G. H. Lalozai (Bannu)

1	2	3	4	5	6	7	8	9
Name of post ذریعہ ملازمت	Whether substantive or officiating and whether permanent or temporary حارثی یا مہتمم	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (19th) volume II اگر حارثی ہے تو کیا وہ رول 3.20 مطابق نیشن کا مستحق ہے؟	Pay in substantive post تنخواہ بطور حارثی ملازمت	Additional pay for officiating زائد تنخواہ بطور مہتمم ملازمت	Other emoluments falling under the term "pay" مسابقاتی تنخواہ دیگر الاٹس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم	Signature designating the office of Attestation دستخط معتمد دفتر
(MPT) S.E.T. BSF GHS Bhoiwale (Bannu)	sub/Per	Pay provisionally fixed in BPS No. 16 Scale No. 16 (C)	RS. P. 3323/5	RS. P. 2535		1-6/94	Rauf Mirza	
do	do		3520/- PM			1-12/94	Rauf Mirza	
SET (MPT) GHS S.K. Boker Ba	do		3520/- PM			25-9/95	(MPT) Rauf Mirza	

Signature designating the office of Attestation

Signature of the Officer (testation) column 1 to

P.R.
G.H.
D.A.

11

6

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 3.	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government.		Signature of the Head of the office or other Attesting officer.	References to any relevant paragraphs of the Government servant.
				Nature and Duration of leave taken	Govt. to which debitable		
				Period			
<p>Principal G.H.S. Ghormala (Bannu)</p> <p>Principal G.H.S.S. Skindar Khel Bannu</p>	<p>25/9/95</p>	<p>Transfer</p>	<p>Principal Govt. High School Ghormala (Bannu)</p>	<p>Approved and Promoted @ SET/Post and Adjusted at R.H.S. Ghormala (Bannu) under D.D.E(S) D.D. Khan. Decision D.D. Khan. Order No. 16222-28/AB-III/625 dated 31/8/1988.</p> <p>Passed one year prescribed programme of vocational Teacher Training held by The N.W.F.P. Board of Technical Education in the month of Feb, 1987 and secured 1078/200 marks placed in grade "C".</p> <p>Result declared on 22/2/88.</p>	<p>Principal Govt. High School Ghormala (Bannu)</p>	<p>Service verified u.o. 13-3-91 to 31-8-95 from A/Roll and office record.</p> <p>Principal Govt. High School Ghormala (Bannu)</p>	

Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 3.

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Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 3.

1	2	3	4	5	6	7	8	
Name of post دوره ملازمت	Whether substantive or officiating and whether permanent or temporary حالی یا دائمی	If officiating: (i) substantive appointment, or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume I اگر عارضی ہے تو کیا وہ رول 3.20 کے مطابق گنتی کے لئے قابل ہے	Pay in substantive post تنخواہ بطور عارضی ملازمت	Additional pay for officiating زائد تنخواہ بطور دائمی ملازمت	Other emoluments falling under the term "pay" تعمیرات تنخواہ	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم	Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8 دستخط افسر مجاز
<p>Revised Entries - RPS-16 (1875/146-4065) (2535-197-5490)</p>								
SET Post SHSS Sr. Bala in	officer Rajindra		Rs. 2751/PM	438/-	3 AM. in MA	31/10/93	Reimbursement	Principal SHSS Sr. Bala
do	do		Rs. 2897/PM			1/93	Reimbursement	Principal SHSS Sr. Bala
<p>Revised Scales w.e.f. 1-6-94 - RPS-16 B-16 (2535-197-5490) Pay fixed provisionally</p>								
do	do		Rs. 3914/PM			6/194	Reimbursement	Principal SHSS Sr. Bala
do	do		Rs. 4111/PM			12/194	Reimbursement	Principal SHSS Sr. Bala

13

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9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government.	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
Principal G.H.S.S. SK. Bala	30/11/93	Promotion	Principal G.H.S.S. SK. Bala	<p>Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government.</p> <p>Govt. to which debitible</p> <p>Period: 1-9-95</p>	Principal Govt. High School, Ghorl Uda (Banna)	Service verified w.e.f. 1-9-95 to 25-9-95 from A/Roll and other office record.
Principal G.H.S.S. SK. Bala	21/5/94	Promotion	Principal G.H.S.S. SK. Bala	<p>Govt. to which debitible</p> <p>Period: 1-9-95</p>	Principal Govt. High School, Ghorl Uda (Banna)	Under Taking
Principal G.H.S.S. SK. Bala	30/11/94	Promotion	Principal G.H.S.S. SK. Bala	<p>Govt. to which debitible</p> <p>Period: 1-9-95</p>	Principal Govt. High School, Ghorl Uda (Banna)	<p>I Mr. Rajiv Singh SET give an Under Taking to the effect that if any overpayment is made to me as a result of fixation of pay on account of giving 3 sev. bands on basis MA on higher educational qualification as letter no. vide No. F.D. SO (SR-V) 2-123/91 dt: 24-9-1995 from Govt. of NWFP Finance Deptt. Peshawar.</p> <p>The amount of overpayment if deducted if it would be shall be recovered from my pay gratuity and pension in whatever the education Deptt. Peshawar may deem necessary.</p> <p>Signature of Govt. servant</p>
Principal G.H.S.S. SK. Bala	30/11/95	Promotion	Principal G.H.S.S. SK. Bala	<p>Govt. to which debitible</p> <p>Period: 1-9-95</p>	Principal Govt. High School, Ghorl Uda (Banna)	<p>Under Taking</p> <p>I Mr. Rajiv Singh SET give an Under Taking to the effect that if any overpayment is made to me as a result of fixation of pay on account of giving 3 sev. bands on basis MA on higher educational qualification as letter no. vide No. F.D. SO (SR-V) 2-123/91 dt: 24-9-1995 from Govt. of NWFP Finance Deptt. Peshawar.</p> <p>The amount of overpayment if deducted if it would be shall be recovered from my pay gratuity and pension in whatever the education Deptt. Peshawar may deem necessary.</p> <p>Signature of Govt. servant</p>
Principal G.H.S.S. SK. Bala	30/11/95	Promotion	Principal G.H.S.S. SK. Bala	<p>Govt. to which debitible</p> <p>Period: 1-9-95</p>	Principal Govt. High School, Ghorl Uda (Banna)	<p>Under Taking</p> <p>I Mr. Rajiv Singh SET give an Under Taking to the effect that if any overpayment is made to me as a result of fixation of pay on account of giving 3 sev. bands on basis MA on higher educational qualification as letter no. vide No. F.D. SO (SR-V) 2-123/91 dt: 24-9-1995 from Govt. of NWFP Finance Deptt. Peshawar.</p> <p>The amount of overpayment if deducted if it would be shall be recovered from my pay gratuity and pension in whatever the education Deptt. Peshawar may deem necessary.</p> <p>Signature of Govt. servant</p>
Principal G.H.S.S. SK. Bala	30/11/95	Promotion	Principal G.H.S.S. SK. Bala	<p>Govt. to which debitible</p> <p>Period: 1-9-95</p>	Principal Govt. High School, Ghorl Uda (Banna)	<p>Under Taking</p> <p>I Mr. Rajiv Singh SET give an Under Taking to the effect that if any overpayment is made to me as a result of fixation of pay on account of giving 3 sev. bands on basis MA on higher educational qualification as letter no. vide No. F.D. SO (SR-V) 2-123/91 dt: 24-9-1995 from Govt. of NWFP Finance Deptt. Peshawar.</p> <p>The amount of overpayment if deducted if it would be shall be recovered from my pay gratuity and pension in whatever the education Deptt. Peshawar may deem necessary.</p> <p>Signature of Govt. servant</p>

Service verified w.e.f. 1-9-95 to 25-9-95 from A/Roll and other office record.

Under Taking

I Mr. Rajiv Singh SET give an Under Taking to the effect that if any overpayment is made to me as a result of fixation of pay on account of giving 3 sev. bands on basis MA on higher educational qualification as letter no. vide No. F.D. SO (SR-V) 2-123/91 dt: 24-9-1995 from Govt. of NWFP Finance Deptt. Peshawar.

The amount of overpayment if deducted if it would be shall be recovered from my pay gratuity and pension in whatever the education Deptt. Peshawar may deem necessary.

Signature of Govt. servant

Exams: each with (M.E.D.)
 vide Govt. of NWFP FD NO
 FD-80 (SR-V) 2-123/91
 dt-24-09-1995

Signature of Govt. servant

Tested

Principal

G.H.S.S. SK. Bala

Principal

G.H.S.S. SK. Bala

1 Name of post نومبر ملازمت	2 Whether substantive or officiating, and whether permanent or temporary حاضری یا مستعمل یا دائم نظام	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر حاضری ہے تو کیا وہ رول 3.20 مطابق پنشن کا مستحق ہے؟	4 Pay in substantive post تظواء بطور حاضری ملازمت	5 Additional pay for officiating زائد تظواء بطور دائم نظام	6 Other emoluments falling under the term "pay" ماحولی تظواء دیگر الاانس	7 Date of appointment تاریخ تقرری	8 Signature of Government servant دستخط سرکاری ملازم	9 Signature designating the office or office of the Attestation Officer دستخط سرکاری ملازم
SET Post SHSS SR Bal 10	<i>[Signature]</i>	B7	4308/-	R.S. 2		12/1/95	Kausar Khan	<i>[Signature]</i>

Earning leaves
Grant leave for Pakistan leave for the period of 14 days
11 days of leave for the period of 1-7-96 to 7-2-1996
11 days of leave for the period of 1-9-96 to 31-8-96
11 days of leave for the period of 20-12-96 to 2-5-96
11 days of leave for the period of 2-5-1996 to 31-8-96
11 days of leave for the period of 2-5-1996 to 31-8-96
11 days of leave for the period of 2-5-1996 to 31-8-96

SHSS SR BAL
 RAJASTHAN

8

9	10	11	LEAVE		14	15	
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
دستخط سر مجاز	تاریخ انقطاع ملازمت	انقطاع ملازمت برقی، لیادار یا بر طریق	دستخط سر مجاز	طبیعت و مدت عہدہ	چار ماہ تک کی رخصت کیلئے اوسط انتظام کا لین Govt. to which debitabile کورسنگ جسے رقم ادا ہوگی	دستخط سر مجاز	سزا یا جزا یا غیر مناسب کارکردگی یا رفتار
Principal G.H.S.S. Skinda BANNU	20-12-90	Promoted on long leave on 1-7-1996	Munwar Khan Principal G.H.S.S. Sk. Bala	2492 5/12/83	Service viewed from the school record 26-09-1995 to 30-11-1995	Munwar Khan Principal G.H.S.S. Sk. Bala	Service viewed from the school record 26-09-1995 to 30-11-1995
Principal G.H.S.S. Sk. Bala	1-7-96	Semi-retired on full pay (Summer vacat)	Munwar Khan Principal G.H.S.S. Sk. Bala	11 days	Service viewed from the school record 31-10-93 to 30-11-95 P.C.A. view 1-6-95 to 30-11-95	Munwar Khan Principal G.H.S.S. Sk. Bala	Service viewed from the school record 31-10-93 to 30-11-95 P.C.A. view 1-6-95 to 30-11-95
Principal G.H.S.S. Sk. Bala	1-7-96	Semi-retired on full pay (Summer vacat)	Munwar Khan Principal G.H.S.S. Sk. Bala	11 days	Service viewed from the school record 1-9-96 to 30-11-96	Munwar Khan Principal G.H.S.S. Sk. Bala	Service viewed from the school record 1-9-96 to 30-11-96

Signature of Head of Office

Principal

Principal
G.H.S.S. Sk. Bala

Principal
G.H.S.S. Sk. Bala

Principal
G.H.S.S. Skinda
BANNU

Proceeded on long leave on 1-7-1996

Service viewed from the school record
26-09-1995 to 30-11-1995

Munwar Khan
Principal
G.H.S.S. Sk. Bala

Service viewed from the school record
31-10-93 to 30-11-95
P.C.A. view 1-6-95 to 30-11-95

Munwar Khan
Principal
G.H.S.S. Sk. Bala

Service viewed from the school record
1-9-96 to 30-11-96

Munwar Khan
Principal
G.H.S.S. Sk. Bala

Service viewed from the school record
1-9-96 to 30-11-96

Munwar Khan
Principal
G.H.S.S. Sk. Bala

Munwar Khan
Principal
G.H.S.S. Sk. Bala

Munwar Khan
Principal
G.H.S.S. Sk. Bala

		If officiating, state—			Other emoluments falling under the term "pay"	Date of appointment	Signature of Government
1 Name of post دوچہ ملازم	2 Whether substantive or officiating, and whether permanent or temporary عارضی، مستقل یا قائم مقام	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول 3.20 مطابق پنشن کا مستحق ہے؟	4 Pay in substantive post تنخواہ بطور عارضی ملازم	5 Additional pay for officiating زائد تنخواہ بطور قائم مقام	6 Other emoluments falling under the term "pay" مستزادہ تنخواہ دیگر الاؤنس	7 Date of appointment تاریخ تقریر	8 Signature of Government servant دستخط سرکاری ملازم
SET Post GHS Sk. 220 off/Int 12/98			Rs. P. BPS - 16	Rs. P. (No. 855-172-5490) Rampahar 455/- Pm.		12/98	
—	—		R.	4702/- Pm.		12/97	ix

Signal design the of office All Off sites of ci 12

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Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office of other Attesting Officer	LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant	
				Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government			
					Period			Govt. to which debitable
Shwarz Khan	30/11/96	Transfer	Shwarz Khan	Annual	Govt. of India	Shwarz Khan		
Shwarz Khan	30/11/97	Transfer	Shwarz Khan	Annual	Govt. of India	Shwarz Khan		
Departmental pay fixation						Shwarz Khan		
BS-16	1875-146-4065			1-6-91	2021/- PD		Service verified w.e.f.	
				1-12-91	2167/- PD			
				31-10-93	2751/- (including M.A)		3 Advance increments	
				1-12-93	2897/-		(12-1-96)	
BS-16	(2535-197-5490)			1-6-94	3914/- PD		30-11-97	
				1-12-95	4111/-			
				1-12-96	4308/-			
					4505/-			
			Shwarz Khan					

Shwarz Khan

QMSA Pat. No.

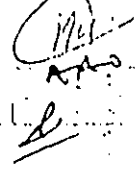
12

Principal SIK Bedla

1 Name of post درجہ ملازمت	2 Whether substantive or officiating and whether permanent or temporary عارضی یا مستقل یا قائم مقام	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول 3.20 مطابق پنشن کا مستحق ہے؟	4 Pay in substantive post. تخواہ بطور عارضی ملازمت	5 Additional pay for officiating زائد تخواہ بطور قائم مقام	6 Other emoluments falling under the term "pay" ماحولیہ تخواہ دیگر الاؤنس	7 Date of appointment تاریخ تقرری	8 Signature of Government servant. دستخط سرکاری ملازم
<p>RS. P.</p>			<p>RS. P.</p>				
<p>Pay fixed in NPS-16 (1875-196-4065) on 1-6-91.</p>							
<p>Pay 1-6-91 Rs. 2555/- P. with next increment = 1 12/91</p>							
<p>NPS-16 (2555-197-5390)</p>							
<p>Pay 1-6-91 Rs. 3914/- P. with next increment = 1 12/91</p>							
<p>28/11/91 A/c of Govt. Officer  Officer</p>							

Signature and designation of the Head of the office or of the Attesting Officer or attestation of column 1 to 8
 دستخط سرکاری ملازم

Notes -
 Provided that an undertaking from the teacher concerned should be obtained that if any over payment made to the teacher on account of wrong fixation / any other grounds, will be recovered from his pay/bonus/ gratuity etc.


 Officer

19

10

8	9	10	11	12	13		14	15
Signature of Government servant	Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
					Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		
					Period	Govt. to which debitable		
		8/98 EN	Post-employment			(13)	31-7-98	
<p>Confirmation/Approval</p> <p>Approved vide Selection Committee held on 27-6-98 w.e.f. taking over charge against SET (Agst.) BPS-15 w.e.f. 1-9-1988, vide DSE-112/P/98 dated Peshawar to 1-7-98</p> <p>Govt. Higher Secy. School</p>								
		31-8-85	31-7-98	EOL 5 Months + 09 days				

ded that
 teaching
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 etc.

verified
 the record
 Govt. Higher Secy. School

Post-employment

d

31-8-85 31-7-98

EOL 5 Months + 09 days

Handwritten signatures and stamps at the bottom of the table.

Passed MA - Exams (Islamiat)
- Gomal University D-1-144
Under R-no-1802 Session 1991.

(11)

The result was declared on 31/10/1993

R. Ahmad
PRINCIPAL
G.H.S.S. Skindar Khd Bala
BANNU

Passed B.Sc (Hons) in agriculture
from University of Peshawar
under R.N. No. 510 in August 1972.

D. Nawaz
PRINCIPAL
Govt. Higher Secondary School
Skindar Khd Bala

27-1-83
576-497
54

(Ordinary Leave Rules)

Date of commencement of service

11/5/1925

LEAVE ACCOUNT

Date of contract, if any.

DUTY	Leave Earned									Leave at Credit									Leave																					
	1/11th of duty subsequent to coming under Fundamental Rules (Rule 81 (b) (ii) or Civil Services Rules (Punjab) 8-74 (b) (ii))									Balance of 2/11ths of duty subsequent to coming under Fundamental Rules or under the Civil Services Rules (Punjab)									1/11th of duty subsequent to coming under Fundamental Rules (Rule 81 (b) (ii) or Civil Service Rules (Punjab) 8-74 (b) Column 16+4)									Balance of 1/11ths of duty subsequent to coming under Fundamental Rules or Civil Service Rules (Punjab) (Columns 17+5)									Total Column (6+7)		On over	
	Y. M. D.			Y. M. D.			Y. M. D.			Y. M. D.			Y. M. D.			Y. M. D.			Y. M. D.			Y. M. D.			Dates		Against entries in column 6													
1	2		3			4			5			6			7			8			9		10																	
Government served under	From	To	Y.	M.	D.	Y.	M.	D.	Y.	M.	D.	Y.	M.	D.	Y.	M.	D.	Y.	M.	D.	From	To	Y.	M.	D.															
	5-1-75	16-1-77	1	8	13	-	1	21																																
	15-5-77	3-8-77												0																										
	4-6-77	10-3-78	9	25				24						25																										
	1-6-78	9-11-78	4	8				11						11																										

13

OFFICE OF THE DIVI: DIRECTOR OF EDUCATION (SCHOOLS) D.I. KHAN DIVN:

ORDER.

Orders of termination of services issued under this office No.9 dated, 1-1-1983, No.6672/AE-VII/FA-SV dated 8-5-83 and that of acceptance of resignation issued under No.6519-23/AE-VII/1-A dated 14-4-1984 in respect of Mr. Rauf, Niaz BSc AGR: now working at Govt: High School Lalozai (Bannu) are hereby withdrawn and he is granted extra ordinary leave without pay for the following periods:-

- 1. 1-1-83 to 26-1-83 - 0-0-26 days ✓
- 2. 15-5-83 to 15-11-83 - 0-6-1 days ✓
- 3. 1-4-84 to 30-8-85 - 1-4-10 days ✓

Total. 1-11-7

NOTE.

Necessary entry to this effect should be made in his Service Book.

(FAZAL UR REHMAN KHAN)
DIVI: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVN: DIKHAN.

Endst: No. 102-5 Dated DIKHAN the 2 / 1 / 1986.

Copy forwarded for information and necessary action to the:-

- 1- District Education Officer (Male) Bannu.
- 2- Head Master Govt: High School Lalozai with reference to his Endst: No. 180/A-2/Orig: dated 17-12-1985.
- 3- Personal file.
- 4- District Accounts Officer Bannu.

DIVI: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVN: DIKHAN.

14-4-79 to 3-9-81
 15-9-81 to 22-5-82
 23-5-82 to 30-10-82
 31-10-82 to 31-12-82

Termination
 Termination

14

8 Signature of Government servant	9 Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal etc)	12 Signature of the Head of the office or other Attesting Officer	13 Leave Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		14 Signature of the head of the office or other Attesting Officer	15 Reference to any recorded punishment or censure, or reward or praised of the Government servant
					Nature and duration of leave taken	Government to which debitable		
<div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%); opacity: 0.5; font-size: 4em;">/</div>					Leave from 20-3-78 to 20-5-78 (2 months and one day)			
					Satisfied with performance vide D.E. No. P.P. P.O. No. 10536/Date 20/3/78.			
					Had very low marks attended the school W. of 7/3/78 to 19/5/78 (as he was discharged from the training camp 7/3/78.			

Head Master
 High School, Dornakal

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state— (i) substantive appointment of (ii) whether service counts for pension under rule 3-20 of C. S. R. (Ph.) volume II	Pay in substantive post		Additional pay for officiating		Other falling under the term "Pay"	Date of appointment
			Rs.	P.	Rs.	P.		
NPS NO 17 P. 520-30-730/35-10								
G.H.S. Dornel SET post (Untrained)	Temp.		520/-	(Fixed)				20/1/1981 14-4-79 (F.N.)
G.H.S. Manash Khal (Banner)	Partt.		520/-	(Fixed)				5/9/1981
G.H.S. Kalozai Banner.	Temp.		520/-	fixed				23.5.1982 (E.N.)
G.H.S. Sikander Khal Bala B.P.H.	Temp.		Rs. 520/-	P.M. fixed				31.10.1981 (A.N.)

15

Leave granted on medical grounds
from 20.9.80 to 30.9.80 (11 days) on
full pay and from 1.10.80 to 12.10.80
without pay vide Div. Director of Edu, D. 1145
dated 12/4/79

8	9	10	11	12	13	14	15	
Signature of Government servant	Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government servant	Signature of the head of the office or other Attesting Officer	Reference to any record to which Government servant is referred or is praised of the Government servant
			Transfer	Jmala Khan	Appointed against S.E.I. post in N.P.S NO 14 (Rs 520/- p.m. fixation) vide D.E (S) NWFP Peshawar. Enlist No 4442-46 dated 12/4/79			
			Transfer	Jmala Khan	Services verified from 14/79 to 3.7.81 from the acquaintance roll & other record of this school.			
			Transfer	Jmala Khan	Service verified from 17/9/1981 to 22-5-1982 from the ACQ: Roll & other record of this school.			
			Transfer	Jmala Khan	Service Verified from 22-5-82 to 10-10-82 From the acquaintance Roll & other Office record.			

1145
Director of Education
NWFP Peshawar
12/4/79

Prof. Jmala Khan

Prof. Jmala Khan

H.M. G.H.S. S.K. Pak. 1983

Verified from 31.10.1982
1982 from the office record

G.H.S. S.K. Pak.

G. M. B. Lalwani

BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL PESHAWAR

Rauf Niaz

Versus

Secretary E&SET Deptt

Re-Joinder on behalf of appellant (Rauf Niaz)

Respectfully Sheweth: -

The Appellants ~~Jointly and severally~~ Submits as under: -

Reply to the preliminary Objections: -

1. That the appellant has got cause of action and locus standi to file appeal.
2. That the instant appeal is not hit by limitation.
3. That the preliminary objection is totally incorrect.
4. That the appellant filed the instant appeal on bonafide motive.
5. That the appellant has come to this court with clean hands.
6. That the appellants is entitled for relief sought from this honorable tribunal.
7. That the instant appeal is filed as per direction/judgement honorable Supreme Court of Pakistan.
8. That the Para No. 8 is baseless and incorrect.
9. That this Honorable Tribunal has got the jurisdiction to adjudicate upon the instant appeal.
10. That the appeal is maintainable in its present form and circumstances of the case.
11. That the para No 11 is incorrect.

12. That the impugned Notification is against the law and facts of the case.

13. That the appellant is entitled for the grant of advance increment as per decision of honorable Supreme Court of Pakistan.

Factual Reply: -

1. That the Para No. 1 needs no reply.

2. That Para No. 2 of the reply is incorrect as the order passed by the respondent No. 5 is against the law facts and circumstances of the case Hence the appellant approached this Honorable Tribunal for this redressal.

3. That Para No. 3 The Instant appeal is filed by the appellant as per direction of the learned Civil Judge.

Grounds: -

- i. Reply to the ground No. I the impugned order passed by the respondent No. 5 is against the law facts and without Jurisdiction. Because the appellant served the respondent deptt since 14-04-1979 to 30-10-2009 and during that period the appellant obtained master decree as well as Diploma in vocational Training in session 1987 therefore the petitioner is entitled for the grant of annual increment in the light of judgment of the Supreme Court of Pakistan.
- ii. Para No. II is incorrect the order of the resignation of the appellant was withdrawn and that very period was considered leave without Pay. (Relevant Documents are attached)
- iii. Para No. III of the Reply is incorrect, unlawful as per order of the divisional director of education (school) Division D.I Khan endorsement No. 102-5 dated 02-01-1986 the resignation under no 6519-23/AE-VII/1-A dated 14-04-1984 in respect of appellant was granted extraordinary leave without pay for the period mentioned in above said order (copy attached)

iv. Para No. IV needs no reply.

In View of the above submission and on acceptance of the instant appeal/rejoinder the order dated 25-07-2017 may kindly be set-aside and the appellant may kindly be granted annual increment Since 1979 till date.

Appellant

Rauf Niaz



Through:



Umar Nasir Advocate

High Court Peshawar



Muhammad Hayat Advocate

High Court Peshawar

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Serial No^{GU} 01494

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



(Session 1991)

RAUF NIAZ SON of MIR MUHAMMAD AYAZ and
a student of the BANNU DISTRICT

having passed the prescribed examination in APRIL/MAY 1993

is this day admitted by the Gomal University to the DEGREE of

MASTER OF ARTS

in the THIRD Class

The subject of examination being ISLAMIYAT

The Examination was taken ~~as a whole~~ in parts.

Registered No. 282-GUMP-89

M. Fayaz
M. FAYAZ
Assistant Professor
G.D.C. Hamesh Khel Bannu

Roll No. 1892

31st OCTOBER, 1993.

Countersigned

[Signature]
Controller of Examinations

[Signature]
Attested
Gazetted Teaching Staff
G. H.S. S.K. Bala
Bannu

[Signature]
Vice-Chancellor



Sr. No. 0101

Roll No.

N.W.F.P. BOARD OF TECHNICAL EDUCATION PESH
DIPLOMA IN VOCATIONAL TEACHER TRAINING
SESSION 1987
ANNUAL

This is to certify that Mr./Miss/Mrs. RAUF NIAZ
Son/Daughter of Mr. MIR MUHAMMAD AYAZ KH
Registered No. ATTT/P/86-116 of the Government Agro Technica
Centre, Deshawar, has successfully completed the one year prescribed program
Teacher Training and has passed the Examination held by the N.W.F.P B
Education, in the month of FEBRUARY, 1987 and secured 1078/2000 &

The Candidate has qualified in the following field.

- | | |
|--------------------|-------------|
| 1. Industrial Arts | 3. Home Eco |
| 2. Agriculture | 4. Commerce |

In recognition thereof, this Diploma is awarded to him/her on the 22nd day of FEBRU

This Diploma is Issued without any erasing/over writing.

M. Fayaz
SECRETARY

Dated Peshawar 22.2 1988.

Attested
G. H. S. S. K. Bala
Banned Teaching Staff
Bannr

1

2467

1. Name _____ (نام)

Mr. Rauf Niaz Khan

2. Nationality and Religion _____ (قومیت اور مذہب)

Pakistani / Islam

3. Residence _____ (مستقل رہائش)

Village: Basia Khel, P. Umerga
Dist: Barani

4. Father's name and residence _____ (والد کا نام اور رہائش)

Mir Muhammad Ayyaz

5. Date of birth by Christian era as nearly as can be ascertained _____ (تاریخ پیدائش مطابق سن عیسوی)

5-6-1949

6. Exact height by measurement _____ (قد و قامت)

(Fifth June, N.H. & Forty Nine

7. Personal mark for identification _____ (لشان شناخت)

6-6

Scars on four hand

8. Left hand/right hand thumb and finger-impressions of (None-gazotted) officer. (بروی صورت میں ہالی اور صورت کی صورت میں دالی مانو کی انگلیوں کے نشانات)

Little Finger (پھنگیا)

Ring Finger (پھنگیا کے مانو کی انگلی)

Middle Finger (انگلیت مبالغہ)

Fore Finger (انگلیت شہادت)

Thum (انگلی)

9. Signature of Government servant _____ (سرکاری ملازم کے دستخط)

Rauf Niaz

10. Signature and designation of the Head of the Office, or other Attesting Officer _____ (تصدیق کنندہ سر کے دستخط اور مہر)

M. A. a
10/5/53

Attested
Principal

PRINCIPAL
Basia Khel Baza

Note :- The entries in this page should be renewed or re-attested at least every five years and the signatures lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule. اس ضلع کے مندرجات کم از کم ہالچ سال بعد تصدیق ہونا ضروری ہیں اور لمبر ۹-۱۰ میں دستخطوں کے تاریخ ہولی چاہیے۔ انگلیوں کے نشانات کمالے ہر ہالچ سال کے بعد تصدیق کی ضرورت نہیں۔

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10
1993
culture
1972

1 Name of post درجہ ملازمت	2 Whether substantive or officiating and whether permanent or temporary عارضی و مستقل یا قائم مقام	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول 3.20 مطابق پنشن کا مستحق ہے؟	4 Pay in substantive post تنخواہ بطور عارضی ملازمت		5 Additional pay for officiating زائد تنخواہ بطور قائم مقام		6 Other emoluments falling under the term "pay" مساوائے تنخواہ دیگر الاؤس	7 Date of appointment تاریخ تقرری	8 Signature of Government servant دستخط سرکاری ملازم
S.V. GHS Marnash of / Khel (Baru) /Temp			RS.	P.	RS.	P.		27/11/1983	Rauf Naz
S.V. GHS Marnash of / Khel (Baru) /Temp		RS. 620 - 29 - 1200	620/-	P. Fixed			N.P.S = 9	16/11/1983	Rauf Naz

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3

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
				Allocation of periods of leave on average; pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government.			
				Nature and duration of leave taken			
				Govt. to which debitable			
				Period			
<p>Head Master Govt. High School Mamash Kuc Bannu.</p>				<p>Appointed against 80 Post vide DDE (S) DT. Khan Divn. DT. Khan Enclt. No: 1563-66/ A-6/c2/Bu-2-25-1-83</p>		<p>Head Master Govt. High School Mamash Kuc Bannu.</p>	
			<p>27-1-83</p>	<p>15-5-83</p>		<p>Head Master Govt. High School Mamash Kuc Bannu.</p>	
	<p>5/15/83</p>	<p>Terminated Head Master Govt. High School Mamash Kuc Bannu.</p>		<p>Service terminated vide of 15/5/83 vide DDE (S) D. I. Khan Divn. DT. Khan Home. No: 6672/ AE-VII/F-A-80, dt 8/5/1983</p>		<p>Head Master Govt. High School Mamash Kuc Bannu.</p>	
<p>Head Master Govt. High School Mamash Kuc Bannu.</p>				<p>Appointed against 80 Post vide DDE (S) DT. Khan Divn. DT. Khan Enclt. NO: 15593-532 Dated 8-11-83</p>		<p>Head Master Govt. High School Mamash Kuc Bannu.</p>	
<p>Head Master Govt. High School Mamash Kuc Bannu.</p>		<p>Resignation of Rauf 11/83 Khan accepted from 21-4-84 vide DDE (S) DT. Khan Divn. DT. Khan Enclt. NO: 6519-23/AE-III/A-A dated 14-4-1984</p>		<p>Head Master Govt. High School Mamash Kuc Bannu.</p>		<p>Head Master Govt. High School Mamash Kuc Bannu.</p>	

1	2	3	4	5	6	7	8
Name of post	Whether substantive or permanent or temporary	If officiating state (i) substantive appointment or (ii) whether counts for pension under rule 3.20 of C.S.R. (Ph) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term 'pay'	Date of appointment	Signature of Government servant
نام پست	حالی یا دائمی یا موقت	اگر عارضی ہے تو کیا وہ رول 3.20 کے تحت گنتی کے لئے ہے	تعمروا بلور عارضی ملازمت	زائد تعروا بلور قائم مقام	باصوال تعروا دیگر الاالی	تاریخ لاری	سرکاری ملازم
B.P.S. 9 Rs. 620-29-1200 (C.T.)							
C.T. S.H.S. dalgaj, Banu	off/temp		Rs. 620 fixed			31/8/85	Rauf Niaz
Provisional pay fixed in B.P.S. No. 9 Rs. 830-38-1590 vide Finana Deptt. Letter No. FD/PR/1-187-VIII dt. 22-7-87 on point to point basis.							
C.T. Post	off/Temp		Rs. 830/-			1/7/87	Rauf Niaz
B.P.S. No 15... 1165-71-2585							
S.E.T (sp)	off/Temp		1165/-	9 P pm. 33/-		1/9/88	Rauf Niaz
G.H.S. Ghoriwala	off/Temp		1236/-	9 Pay 35/-		1/12/89	Rauf Niaz
- Do -	off/Temp		1307/-	9 Pay 37/-		1/12/90	Rauf Niaz
Pay provisionly fixed in BPS-15							
Scale 15: - 1620 - 131 - 3585							
G.H.S. Ghoriwala	off/Temp		1892/-	pm. X		1/6/91	Rauf Niaz
SE-T Post							
Pay provisionly fixed in BPS-16							
Scale 16: - 1875 - 146 - 4065							

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

دستخط سرکار

Signature of Government servant

GHS Lalozai

Signature of Government servant

GHS Ghoriwala

Signature of Government servant

GHS Ghoriwala

Signature of Government servant

GHS Ghoriwala

Signature of Government servant

GHS Ghoriwala

Signature of Government servant

GHS Ghoriwala

(5)

(3)

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8 دستخط المر مجاز	Date of termination or appointment تاریخ الطاع ملازمت	Reason of termination (such as promotion, transfer, dismissal etc.) وجوه الطاع ملازمت رغبتاً یا لاجباراً یا لغيره	Signature of the Head of the office of other Attesting Officer دستخط المر مجاز	Nature and Duration of leave taken رغبتاً و لوجبت و مباد	<p>LEAVE:</p> <p>Allocation of periods of leave on average of four months (or earned leave not exceeding 120 days) to which leave is debitable to another Government توزيع اوقات الإجازة على معدل أربعة أشهر (أو الإجازة المكتسبة التي لا تتجاوز 120 يوماً) التي يمكن أن تكون مستحقة لغير حكومة أخرى</p> <p>Period Govt. to which debitable فترة الحكومة التي يمكن أن تكون مستحقة</p>	Reference to any special award, merit or censure, or other special consideration إشارة إلى أي جائزة خاصة، أو مدح، أو عقاب، أو اعتبار خاص آخر
<p><i>CP. Chandra</i> Headmaster GHS Lalozai Bannu 30/11/84</p>	<p>30/11/84</p>	<p>H.M. G.H.S. Lalozai (Bannu)</p>	<p>H.M. G.H.S. Lalozai (Bannu)</p>	<p>Appointed against C.T. Post vide D.O. (S) Dt. Khan Dirm. Dt. Khan Endst. No 12439-43/c-3</p>	<p>Correspondance SET/BXU dated 20-8-85</p>	<p>Headmaster GHS Lalozai Bannu</p>
<p>H.M. G.H.S. Lalozai (Bannu)</p>	<p>31/8/88</p>	<p>Promoted to GHS Ghoriwala Bannu</p>	<p>Head Master G.H.S. Lalozai Bannu</p>			<p>Headmaster GHS Lalozai Bannu</p>
<p>Govt. Principal Ghoriwala Bannu</p>	<p>30/11/84</p>	<p>Incr 30/11/84</p>	<p>Principal G.H.S. Ghoriwala (Bannu)</p>		<p>1.23 2/11</p>	<p>one month 30/11/85 to 30/11/86 (7-4)</p>
<p>Principal G.H.S. Ghoriwala (Bannu)</p>	<p>30/11/90</p>	<p>Incr</p>	<p>Principal G.H.S. Ghoriwala (Bannu)</p>		<p>30/11/85</p>	<p>P. Rev.</p>
<p>Principal GHS Ghoriwala (Bannu)</p>	<p>31/1/91</p>	<p>P. Rev.</p>	<p>Principal GHS Ghoriwala (Bannu)</p>		<p>31/1/91</p>	<p>G. Rev.</p>
<p>Principal GHS Ghoriwala (Bannu)</p>	<p>31/1/91</p>	<p>G. Rev.</p>	<p>Principal GHS Ghoriwala (Bannu)</p>		<p>Service Verified From 31-8-85 to 30-11-85 From the Acquittance Roll & other Office record.</p>	<p>Headmaster GHS Lalozai Bannu</p>

Name of post درجہ ملازمت	Whether substantive or officiating, and whether permanent or temporary عارضی یا قائم مقام مستقل یا مستعمل	If officiating, (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Ph.) volume II اگر عارضی ہے تو کیا وہ رول 3.20 مطابق پینشن کا مستعمل ہے؟	Pay in substantive post تنخواہ بطور عارضی ملازمت	Additional pay for officiating زائد تنخواہ بطور قائم مقام	Other allowances falling under the term "pay" ماسوائے تنخواہ دیگر الاؤنس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم	Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8 دستخط سرکار
S.E.T G.H. S Ghoriwala S.E.T. Post	off/Temp		AS, P. 2021/-Pm	AS, P.		6/91	Rauf Niazi	Asst. Secy. (S. Ghoriwala ANNU)
do	do		2167/-Pm			12/91	Rauf Niazi	Asst. Secy. (S. Ghoriwala ANNU)
do	do		2313/Pm			12/92	Rauf Niazi	Asst. Secy. (S. Ghoriwala ANNU)
do	do		2459/-Pm			12/93	Rauf Niazi	Asst. Secy. (S. Ghoriwala ANNU)

(7)

(4)

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office of other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the Head of the office or other Attesting Officer	Reference to any official papers, orders, award or settlement
				Nature and duration of leave taken	Period	شماره امر مجاز	مزایا حراما غیر مناسب کارکردی
					Govt. to which debitable		
Principal, GHS, Ghoriwala (BANNU)	30-11-91	مجاز	Principal, GHS, Ghoriwala (BANNU)	مجاز		2	Service Verified From 1-11-85 to 11-10-86 From the Acquittance Roll & other Office record,
Principal, GHS, Ghoriwala (BANNU)	30-11-92	مجاز	Principal, GHS, Ghoriwala (BANNU)	مجاز		3	Service Verified From 1-10-86 to 30-11-87 From the Acquittance Roll & other Office record,
Principal, GHS, Ghoriwala (BANNU)	30-11-93	مجاز	Principal, GHS, Ghoriwala (BANNU)	مجاز			
Principal, GHS, Ghoriwala (BANNU)	31-5-94	Pay Revision	Principal, GHS, Ghoriwala (BANNU)	مجاز			
<p>CT. 1-12-87 to 31-8-88</p> <p>SET. 1-9-88 to 20-12-88</p>						4	Service Verified From 1-12-87 to 23-12-88 From the Acquittance Roll & other Office record,

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment تاریخ الطاع ملازمت	Reason of termination (such as promotion, transfer, dismissal etc.) الطاع ملازمت لرلی، تبادلہ یا برطوبی	Signature of the Head of the office of other Attesting Officer دستخط السر مجاز	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave-salary is debitable to another Government چار ماہ تک کی رخصت کیلئے اوسط للغواہ کا زمین Government Nature and duration of leave taken رخصت کی طوعیت و معاہد Period مہرہ Govt. to which debitable گورنمنٹ جسے رہم انا ہوگی		Signature of the head of the office or other Attesting officer دستخط السر مجاز	Reference to any recorded punishment or censure, or reward or praise of the Government servant مزا یا حرا یا غیر مناسبہ کار کردگی کا ریکارڈ
						<p>Service Verified From 1-9-88 to 31-8-91 From the Acquittance Roll & other Office record.</p> <p>Head Master G. H. E. Lalozai (Bannu)</p> <p>Drawn Rs. 211/- as salary on account of adhoc purchase to civil employees w.e.f. 13-8-89 to 30-12-89 vide P.O. No. 1631 dated 23-1-90 and Rs. 62/- w.e.f. 1-12-89 to 31-12-89 vide P.O. No. 1630 dated 23-1-90 and Rs. 77/- w.e.f. 1-7-90 to 12-8-89 vide P.O. No. 1678 dated 10-2-90</p> <p>Principal Govt. High School Bannu</p>	
						<p>Service verified w.e.f. 1-9-88 to 12-3-91 from A/R and other office records</p> <p>Principal Govt. High School Bannu</p>	
						<p>Leave w.e.f. from 1-9-90 to 31-8-91 (Sanctioned) vide Dist. Director of Edu. (S) D. J. Khan a/c no. D. J. A Endst. no. 21676-79/A-III/PP-625/SEI. dated 15-12-90 Detail is as under.</p> <p>1. w.e.f. 1-9-90 to 28-4-91 (210-days) on Half Pay 2. w.e.f. 29-4-91 to 15-6-91 (48 days) without pay 3. w.e.f. 16-6-91 to 31-8-91 (77 days) on full pay due to summer vacation on official P. A. leave</p>	

Signature of Government servant
دستخط سرکاری

4/5
1/8 to 30/9
vide T-1687
29/6/91
ms

4/5
vide T-1688
29/6/91
ms

1	2	3	4	5	6	7	8	9
Name of post درجہ ملازمت	Whether substantive or officiating and whether permanent or temporary عارضی یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Ph.) volume II اگر عارضی ہے تو کیا وہ رول 3 مطابق پنشن کا مستحق ہے	Pay in substantive post تنخواہ بطور عارضی ملازمت	Additional pay for officiating زائد تنخواہ بطور قائم مقام	Other emoluments falling under the term "pay" مسابقاتی تنخواہ دیگر الاصل	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم	Signature designating the office of Attestation of column 1 to 8 Signature of office of Attestation of column 1 to 8
S.E.T. (A.P.) GHS Ghosiwala (Bannu)	Sub/Pls	Pay Provisionally Scale No. 16 (C)	RS. P. 3323/-	RS. P. Fixed in BPS No. 16 (2535-197-5490)		1.6.94	Rauf Mirza	
do	do		3520/- pm			12.9.94	Rauf Mirza	
SET (A.P.) 7435 SL-Bannu Bc	do		14 3520/- pm			25.9.95	(A.P.) Rauf Mirza	P.R. G.H. B.A.

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9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	LEAVE Allocation of periods of leave on average pay, upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Reference to any recorded punishment, or award of Government servant
					Govt. to which debitable	
<p>Principal G.H.S. Ghoriwala (Bannu)</p> <p>Principal G.H.S.S. Skindar Khel BANNU</p>	<p>25/9/95</p> <p>transfer</p>	<p>Principal GOVT. HIGH SCHOOL GHORIWALA (BANNU)</p>	<p>Principal GOVT. HIGH SCHOOL GHORIWALA (BANNU)</p>	<p>Period</p>	<p>31/8/1988</p> <p>Principal GOVT. HIGH SCHOOL Ghoriwala (Bannu)</p>	<p>aginst pay</p> <p>Appointment and promotion @ SBI/Post and</p> <p>Adjusted at R.H.S. Ghoriwala (Bannu) under</p> <p>D.D.E (S) D.D. Khan Decision D.D. Khan</p> <p>Endst. No. 16222-28/AB-III/625/contd</p> <p>31/8/1988</p> <p>Principal GOVT. HIGH SCHOOL Ghoriwala (Bannu)</p> <p>Passed one year prescribed</p> <p>Programme of vocational Teacher</p> <p>Training held by The N.C.T.P.</p> <p>Board of Technical Education in the</p> <p>month of Feb, 1987 and secured 1078/200</p> <p>marks placed in grade "C"</p> <p>Result declared on 22/2/88</p> <p>Principal GOVT. HIGH SCHOOL Ghoriwala (Bannu)</p> <p>Service verified on 13-3-91 to</p> <p>31-8-95 from office and office record</p> <p>Principal GOVT. HIGH SCHOOL Ghoriwala (Bannu)</p>

Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

Principal Ghoriwala (Bannu)

Principal G.H.S. Ghoriwala (Bannu)

Principal G.H.S.S. Skindar Khel Bannu

Principal G.H.S. Ghoriwala (Bannu)

Principal G.H.S.S. Skindar Khel Bannu

Principal G.H.S. Ghoriwala (Bannu)

Principal G.H.S.S. Skindar Khel Bannu

Principal G.H.S. Ghoriwala (Bannu)

1 Name of post نام پست	2 Whether substantive or officiating and whether permanent or temporary ہائیکلاس یا قائم مقام	3 If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) volume II اگر ہائیکلاس ہے تو کیا وہ روٹ ہے	4 Pay in substantive post تنخواہ بطور عارضی ملازمت	5 Additional pay for officiating زائد تنخواہ بطور قائم مقام	6 Other emoluments falling under the term "pay" دیگر تنخواہ	7 Date of appointment تاریخ تقرری	8 Signature of Government servant دستخط سرکار	9 Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8 دستخط سرکار
<p>Revised Scales - BPS-16 (1875-146-4065) (2535-197-5490)</p>								
SET post SHSS, S.I.C. Daba	Officer	Principal	RS. P. 2751	RS. P. 438 2751	438	31/10/95	Rampal	Principal SHSS, S.I.C. Daba
do	do	do	B ₂ 2897/PM	2897/PM	Principal	12/1/93	Rampal	Principal SHSS, S.I.C. Daba
<p>Revised Scales w.e.f. 1-6-94 = BPS-16 B-16 (2535-197-5490) Pay fixed provisionally</p>								
do	do	do	B ₂ 3914/PM	3914/PM	Principal	12/1/94	Rampal	Principal SHSS, S.I.C. Daba
do	do	do	B ₂ 4111/PM	4111/PM	Principal	12/1/94	Rampal	Principal SHSS, S.I.C. Daba

13

7

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government. Nature and duration of leave taken Govt. to which debitible	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
<i>Principal</i> G.H.S.S. SK. Raha	30 ¹¹ / ₉₃	mer.	<i>Principal</i> G.H.S.S. SK. Raha	(8) service verified w.e.f. 1-9-95 To 25-9-95 from A/Roll and other office record.	<i>Principal</i> GOVT. HIGH SCHOOL, Ghor Dala (Bannu)	
<i>Principal</i> G.H.S.S. SK. Raha	21 ⁵ / ₉₄	scale revised	<i>Principal</i> G.H.S.S. SK. Bala	Under Taking I am having NIA SET given as under taking to the effect that if any over payment is made to me as a result of fixation of pay on account of giving 3rd tier, on basis of A on higher educational qualification as per para 12 vide no. FD-50 (SR-V) 2-123/91 dt: 24-9-1995 from Govt. of NWFP Finance Dept. Bannu.	<i>Principal</i> GOVT. HIGH SCHOOL, Ghor Dala (Bannu)	
<i>Principal</i> G.H.S.S. Skindar Kial Bala D.J.V.N.U.	30 ¹¹ / ₉₅	mer.	<i>Principal</i> G.H.S.S. SK. Bala	The amount of over payment if deducted after wards. It shall be recovered from my pay/ gratuity and pension what ever. The education Dept. Bannu may deem necessary. signature of Govt. servant <i>Kaufaiya</i>	<i>Principal</i> G.H.S.S. SK. Bala	Attested <i>Kaufaiya</i>

MED. 1799

vide Govt: Of NWFP, FD no FD-50 (SR-V) 2-123/91 dt: 24-09-1995

9	Signature designated by the He of the Office of the Assistant Secretary of State	
8	Signature of Government servant	
7	Date of appointment	1951
6	Other elements falling under the term "pay"	12/1951
5	Additional pay for officiating	
4	Pay in substantive post	4308/PM
3	If officiating, (i) substantive appointment or (ii) whether vice counts for pension under C.S.R. (pb) volume II	157
2	Whether substantive or officiating, permanent or temporary	
1	Name of post	SET Post 5155 SR. DLK

1) 12/1951
 2) 1-9-96
 3) 2-2-96
 4) 3-1-89
 5) 2-5-96
 6) 1-1-96
 7) 1-1-96
 8) 1-1-96
 9) 1-1-96
 10) 1-1-96
 11) 1-1-96
 12) 1-1-96

1) 12/1951
 2) 1-9-96
 3) 2-2-96
 4) 3-1-89
 5) 2-5-96
 6) 1-1-96
 7) 1-1-96
 8) 1-1-96
 9) 1-1-96
 10) 1-1-96
 11) 1-1-96
 12) 1-1-96

1) 12/1951
 2) 1-9-96
 3) 2-2-96
 4) 3-1-89
 5) 2-5-96
 6) 1-1-96
 7) 1-1-96
 8) 1-1-96
 9) 1-1-96
 10) 1-1-96
 11) 1-1-96
 12) 1-1-96

1) 12/1951
 2) 1-9-96
 3) 2-2-96
 4) 3-1-89
 5) 2-5-96
 6) 1-1-96
 7) 1-1-96
 8) 1-1-96
 9) 1-1-96
 10) 1-1-96
 11) 1-1-96
 12) 1-1-96

1) 12/1951
 2) 1-9-96
 3) 2-2-96
 4) 3-1-89
 5) 2-5-96
 6) 1-1-96
 7) 1-1-96
 8) 1-1-96
 9) 1-1-96
 10) 1-1-96
 11) 1-1-96
 12) 1-1-96

RINOID
 O.I.S.S.
 RAN.7

(14)

9	10	11	LEAVE		Signature of the head of the office or other Attesting Officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant	
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned days) to which leave salary is debitable to another Government	Signature of the head of the office or other Attesting Officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant
<p>Principal G.H.S.S. Skindar BANNU</p>	<p>26-09-1995 to 30-11-1995</p>	<p>Service leave of wife</p>	<p>Principal G.H.S.S. Sk. Bala</p>	<p>9</p>	<p>Allocation of periods of leave on average pay upto four months (or earned days) to which leave salary is debitable to another Government</p>	<p>Principal G.H.S.S. Sk. Bala</p>	<p>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</p>
<p>Principal G.H.S.S. Sk. Bala</p>	<p>1-9-1996 to 31-8-96</p>	<p>Service leave of wife</p>	<p>Principal G.H.S.S. Sk. Bala</p>	<p>10</p>	<p>Allocation of periods of leave on average pay upto four months (or earned days) to which leave salary is debitable to another Government</p>	<p>Principal G.H.S.S. Sk. Bala</p>	<p>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</p>
<p>Principal G.H.S.S. Sk. Bala</p>	<p>1-9-96 to 30-11-96</p>	<p>Service leave of wife</p>	<p>Principal G.H.S.S. Sk. Bala</p>	<p>11</p>	<p>Allocation of periods of leave on average pay upto four months (or earned days) to which leave salary is debitable to another Government</p>	<p>Principal G.H.S.S. Sk. Bala</p>	<p>Reference to any recorded punishment, or censure, or reward or praised of the Government servant</p>

Signature of the Head of the office or other Attesting Officer in attestation of columns 1 to 8

Principal
G.H.S.S. Sk. Bala

Principal
G.H.S.S. Sk. Bala

Principal
G.H.S.S. Sk. Bala

Proceeded on long leave on 1-9-1996 to 20-12-96
Principal
G.H.S.S. Sk. Bala

2492
Rs 13966/62 on a/p/h
31-10-93 to 30-11-95
1-6-95 to 30-11-95

(Notification)
Sanctioned ED - Pakistan
Leave vide Govt. of NWFP
Education Dept. vide
Notification No-50(S)
2-5/96 Vol-I
dated Peshawar 2-7-1996
1-9-96 to 31-8-96 on full pay
(Summer vacation)

2-9-96 to 30-11-96 111 days
(leave with out pay)

Principal
G.H.S.S. Sk. Bala

Principal
G.H.S.S. Sk. Bala

Principal
G.H.S.S. Sk. Bala

If officiating, state—

Other emoluments falling

Date of appointment

Signature of Government

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1 Name of post نام پست / ملازمت	2 Whether substantive or officiating and whether permanent or temporary حالی یا قائم مقام / مستقل یا موقت	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر حالی ہے تو کیا وہ رول کے مطابق پینشن کے لئے مستعمل ہے؟	4 Pay in substantive post تعطیل پر ملازمت	5 Additional pay for officiating زائد تعطیل پر ملازمت	6 Other emoluments falling under the term "pay" مستواں تعطیل پر ملازمت	7 Date of appointment تاریخ تعینات	8 Signature of Government servant مستعمل کا دستخط
SE II Post GASS SK. No. 12/1			Rs. P. BPS-16	Rs. P. (No. 8555-197-5490)	Per 4505/-	12/96	Rampahoz
---	---		Rs. 4702/-	Per	12/97		---

Signature of Government servant

Signature of Government servant

Signature of Government servant

(17)

(9)

10	11	12	13		14	15	
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8 دستخط افسر مجاز	Date of termination or appointment تاریخ الطاع ملازمت	Reason of termination (such as promotion, transfer, dismissal etc.) وجوه الطاع ملازمت ترقی، تبادلہ یا برطرفی	Signature of the Head of the office of other Attesting Officer دستخط افسر مجاز	LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government. میان ماہ تک کی رخصت کیلئے اوسط تنخواہ کا تین		Signature of the head of the office or other Attesting Officer دستخط افسر مجاز	Reference to any recorded punishment, or censure, or reward or praised of the Government servant سزا یا جزا یا عیب یا ستائش کی کارکردگی کا تذکرہ
				Nature and duration of leave taken رخصت کی نوعیت و عرصہ	Govt. to which debitable کونسلٹ افسر رہم ادا ہوگی		
Shwarz Kh Principal G.H.S. B. B.	30/11/96	Increment	Shwarz Kh Principal G.H.S. B. B.				The unavailed portion of leave w.e.f. 1-12-96 to 20-12-96 has been cancelled vide Govt. N.W.F.P. Edu. Deptt. Pesh. Notification No. So (S) 2-5/967 and Extra. N. 3866-70 dated 29-1-97
Shwarz Kh Principal G.H.S. B. B.	30/11/97	Inc.	Shwarz Kh Principal G.H.S. B. B.				Departmental pay fixation B.S. 16 (1875-146-4065) Pay 1-6/91 Rs = 2021/- P.D. 1-12-91 Rs = 2167/- P.D. 31-10/93 Rs = 2751/- (included 3 Advance increments on M.A.) 1-12-93 Rs = 2897/-
Shwarz Kh Principal G.H.S. B. B.	1-12-96		Shwarz Kh Principal G.H.S. B. B.				Service verified w.e.f. 1-12-96 to 30-11-97
Shwarz Kh Principal G.H.S. B. B.	1-12-95		Shwarz Kh Principal G.H.S. B. B.				
Shwarz Kh Principal G.H.S. B. B.	1-12-96		Shwarz Kh Principal G.H.S. B. B.				

Salary

(12)

Shwarz Kh
Principal
G.H.S. B. B.

Name of post نام پست ملازمت	Whether substantive or officiating and whether permanent or temporary عارضی یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول کے مطابق پینشن کا مستحق ہے؟	Pay in substantive post تنخواہ بطور عارضی ملازمت		Additional pay for officiating زائد تنخواہ بطور قائم مقام		Other emoluments falling under the term "pay" مساواں تنخواہ دیگر الاانس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم
			RS.	P.	RS.	P.			

Signature and designation of the Head of the office or of the Attesting Officer with attestation of column 1 to 8
دستخط سرکار

Pay fixed in MS-16 (1875-146-4065) on 1-6-91

Pay 1-6-91 — P. 2535/Pr
with next increment = $1\frac{12}{94}$

MS-16 (2535-187-5590)

Pay 1-6-91 — P. 3914/Pr
with next increment = $1\frac{12}{94}$

Notes —
Provided that an undertaking from the teacher concerned should be obtained that if any overpayment made to the teacher on account of wrong fixation/any other grounds, will be made recovered from his pay/bonus/ gratuity etc.

MS-16 A/c of Govt.
Bannu

[Signature]
A/c

(11)

Passed MA - Exams. from (Islamiyat)
Gomal University D-1-Khel
Under R-No-1802 Session 1991.
The result was declared on 31/10/1993

R. Ahmad
PRINCIPAL
G.H.S.S. Skinner Khel Beld
BANNU

Passed B.Sc (Hons) in agriculture
from University of Peshawar
under Roll No. 510 in August 1972.

Dr. Nawaz
PRINCIPAL
Govt. Higher Secondary School
Bikandur

27-1-83
5-6-49
54

(13)

OFFICE OF THE DIVL: DIRECTOR OF EDUCATION (SCHOOLS) D.I. KHAN DIVN:

ORDER.

Orders of termination of services issued under this office No.9 dated, 1-1-1983, No.6672/AE-VII/PA-SV dated 8-5-83 and that of acceptance of resignation issued under No.6519-23/AE-VII/1-A dated 14-4-1984 in respect of Mr. Rauf, Niaz BSc Agr; now working at Govt: High School Lalozai (Bannu) are hereby withdrawn and he is granted extra ordinary leave without pay for the following periods:-

- 1. 1-1-83 to 26-1-83 - 0-0-26 days ✓
- 2. 15-5-83 to 15-11-83 - 0-6-1 days ✓
- 3. 27-4-84 to 30-8-85 - 1-4-10 days ✓

Total- 1-11-7

NOTE.

Necessary entry to this effect should be made in his Service Book.

(FAZAL UR REHMAN KHAN)
DIVL: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVN: DIKHAN.

Endst: No. 102-5 Dated DIKHAN the 2 / 1 / 1986.

Copy forwarded for information and necessary action to the:-

- 1- District Education Officer (Male) Bannu.
- 2- Head Master Govt: High School Lalozai with reference to his Endst: No. 180/A-2/Orig: dated 17-12-1985.
- 3- Personal file.
- 4- District Accounts Officer Bannu.

~~DIVL: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVN: DIKHAN.~~

HB

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14-4-79 to 3-9-81
5-9-81 to 22-5-82
23-5-82 to 30-10-82
31-10-82 to 31-12-82

Termination فی فیصلہ فی فیصلہ
Termination فی فیصلہ فی فیصلہ
- فی فیصلہ فی فیصلہ

14

8	9	10	11	12	13 Leave		14	15	
Signature of Government servant	Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		Signature of the head of the office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
						Period	Government to which debitable		
						Leave from 20-3-78 to 20-5-78 (2 months and one day) Satisfied m/p pay with D.E. rem p.l. P.O. No. 10536/Date 20/3/78. P.O. No. 1111 High School Dornal (M.D.) Subject - Mrs Hand writing lesson has attended the school on 7/3/78 at 19/3/78 (can be discharged from the training on 7/3/78) P.O. No. 1111 High School Dornal Subject - ... from 10-10-10 to 30-10-10 (30 days) on which pay with D.E. P.O. No. 14577/Date 20-3-78			

Head Master
High School Dornal

Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating state— (i) substantive appointment of (ii) whether ser- vice counts for pension under rule 3-20 of C. S. R. (Ph.) volume II	4 Pay in sub- stantive post		5 Additional pay for officiating		6 Other falling unde. the term "Pay"	Date of appointment
			Rs.	P.	Rs.	P.		
GHS Dornel SET post (Unbrained)	Temp.		520/-	(Fixed)			14-4-79 (F.N.)	Date of appointment
GHS Maniash Khal (Barnes)	Part.		520/-	(Fixed)			5/9/1981	Date of appointment
G.H. Lalozan Bairner	Temp.		520/-	fixed			23.5.1982 (E.N.)	Date of appointment
G.H.S. Sikander Khal Baly of Bahu	Temp.		520/-	P.M. fixed			31.10.1982 (A.N.)	Date of appointment

NPS NO 17 R 520-30-730/35-1010

Devi/Janif

15

8 Signature of Government servant	9 Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal etc)	12 Signature of the Head of the office or other Attesting Officer	13 Nature and duration of leave taken	14 Allocation of periods of leave pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government servant	15 Reference to any record of punishment or reward of the Government servant
<p>Signature of Government servant</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8</p> <p>Transfer</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Date of termination of appointment</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Reason of termination (such as promotion, transfer, dismissal etc)</p> <p>Transfer</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Signature of the Head of the office or other Attesting Officer</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Nature and duration of leave taken</p> <p>Leave</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Allocation of periods of leave pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government servant</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Reference to any record of punishment or reward of the Government servant</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>
<p>Signature of Government servant</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8</p> <p>Transfer</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Date of termination of appointment</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Reason of termination (such as promotion, transfer, dismissal etc)</p> <p>Transfer</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Signature of the Head of the office or other Attesting Officer</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Nature and duration of leave taken</p> <p>Leave</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Allocation of periods of leave pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government servant</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>	<p>Reference to any record of punishment or reward of the Government servant</p> <p>11/4/79</p> <p>30 10/82</p> <p>1983</p> <p>1982 from the office record</p> <p>G.H.S. S.K. Bala</p>

Leave granted on medical grounds
 from 20.9.80 to 30.9.80 (11 days) on full pay and from 1.11.80 to 2.11.80 without pay vide Div. Director of S.E. B. Khan

No 7832 dated 12/4/79
 Allocation of periods of leave pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government servant

Appointed against S.E.T. post in N.P.S. No. 14 (Rs 520/- p.m. fixed) vide D.E (S) NWFP, Peshawar Enlist No 4442-46 dated 12/4/79.

Desai/Janjani

(1) Services verified from 14/79 to 3.9.81 from the acquaintance roll & other records of this school.

(2) Service verified from 19/1/1981 to 22-5-1982 from the ACQ. Roll & other records of this school.

(3) Service Verified From 23.5.81 to 30-10-82 From the acquaintance Roll & other Office record.

Signature of Government servant

Signature of Government servant

Signature of Government servant

Signature of the Head of the office or other Attesting Officer

Signature of the Head of the office or other Attesting Officer

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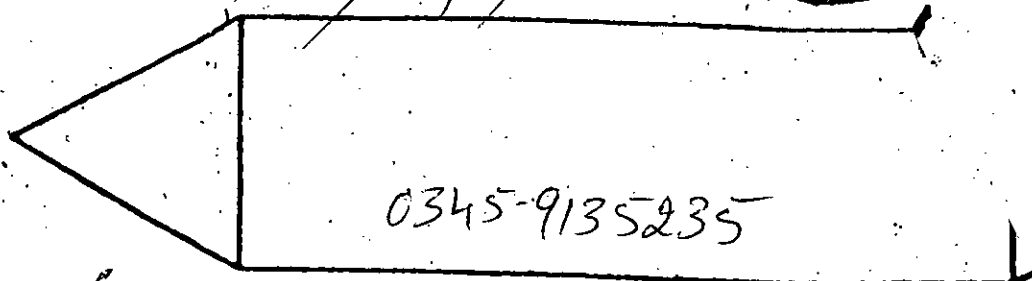
Signature of the Head of the office or other Attesting Officer

Signature of the Head of the office or other Attesting Officer

Signature of the Head of the office or other Attesting Officer

Signature of the Head of the office or other Attesting Officer

تجدیداً سرسوں میں بیٹوں حضرت خیر خواہ علیہ السلام



0345-9135235

سید منجانب اسلم

روف نیاز

موزونہ

مقدمہ

دعویٰ

جزم

بنام

سید محمد امجد علیہ السلام

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکیل کارروائی متعلقہ آن مقام کے لئے شجر ماہر خان / محمد شعیب ایدوہی مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقررات و فیصلہ برحلف دیے جواب دہی اور اقبال دعویٰ اور بصورت وگری کرنے اجراء اور دعویٰ چیک و روپیہ اور مرضی دعویٰ اور درخواست ہر قسم کی تصدیق نہ رہیں پرستہ نہ کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا وگری یکفر یا اپیل کی برآمدگی اور مرضی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تفرز کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو جسی وہی جلد مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرداخت منظور و قبول ہوگا۔ و دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز تقیاد خرچہ کی ذمہ داری کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا عدسے باہر ہو تو وکیل صاحب پابند نہ ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا ذکات نامہ کھدیا کہ سنند رہے۔

2018

ماہ اپریل

المترجم

العبد المذنب

کے لئے منظور ہے۔

مقام Raul Niaz

روف نیاز