

2

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No: 1278/2022

Khyber Pakhtunkhwa
Service Tribunal

Case No. 2889

Dated 2/2/2023


Muhammad Israr, Ex- HM BPS-17 District Malakand.....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa through the Secretary
(E&SE) Department & otherRespondents

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

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1278/2022

Muhammad Israr, Ex- HM BPS-17 District Malakand.....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa through the Secretary (E&SE) Department & other.....Respondents.

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-3.

Respectfully Sheweth:-

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi to file in the instant case before this Honorable Bench.
- 2 That the Appellant is not an aggrieved person within the meaning of Article-212 of the Constitution of Islamic Republic of Pakistan 1973, hence, the case in hand is liable to be rejected in favor of the Respondent No. 1-3.
- 3 That the Appellant has concealed material facts & record from the ambit of this Honorable Tribunal in the titled case.
- 4 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 5 That the titled case is barred by law and limitation Act 1908.
- 6 That the titled case is bad for mis-joinder & non-joinder of the necessary parties to the case.
- 7 That the appellant is estopped by his own conduct to file the instant case against the Department.
- 8 That the matter is not maintainable in its present circumstances and even facts of the case rather the appellant is a habitual litigant against the Department for no good cause of action.

- 9 That the appellant is not entitled for the grant of pay fixation in view of the letter dated 30-3-2009 w.e.f. 20-09-1974 to 13-08-1986 against the Head Master in BPS-17 (TC) post from the Department.
- 10 That the appellant is not entitled for the grant of back service benefits against the mentioned post.

ON FACTS.

1. That Para-1 needs no comments being pertains to the service record of the appellant against the noted post vide appointment order dated 20-09-1974 attached as **Annexure-A**.
2. That Para-2 is also pertains to the service record of the appellant against the CT (M) post appointed a fresh vide order dated 13-08-1986 attached as **Annexure-B**.
3. That Para-3 is correct to the extent of promotion and regularization of the appellant vide order dated 06-02-1990 on the basis of passing the Be.d which is mandatory for reckoning of seniority against a post under the rules attached as **Annexure-C**.
4. That Para-4 is also correct that vide order dated 01-7-1998, the appellant has promoted/upgraded in BPS-17 Head master post by the Department which is attached as **Annexure-D**.
5. That para-5 is correct to the extent of the Notification dated 30-03-2009 of the Respondent No.2, whereby, annual increments/running pay was allowed to the Teaching staff with the pre-condition & provision that no arrear shall however, be admissible/payable prior to the date of issuances of this circular attached as **Annexure-E**, whereas, the appellant is seeking for the grant arrears w.e.f. 20-9-1974 to 13-8-1986 which is out of the ambit of the aforesaid Notification dated 30-3-2009 of the Respondent No.2.
6. That Praa-6 is incorrect, hence, denied on the grounds as agitated in para-5 of the present reply on behalf of the Department, hence, needs no further comments.
7. That Para-7 is also incorrect as no Departmental appeal/application has been filed by the appellant, hence, the appeal in hand is liable to be rejected on the following grounds inter alia:-


GROUND:-


- A. **Incorrect & not admitted.** The Act of the Department is legal and liable to be maintained.

- B. Incorrect & not admitted.** The appellant has been treated as per law & rules in field by the Respondents in the titled case.
- C. Incorrect & not admitted.** Hence, needs no further comments as the Notification dated 30-03-2009 is very much speaking one.
- D. Incorrect & not admitted.** The act of the Department is within legal parameter & liable to be maintained.
- E. Incorrect & not admitted.** Hence, needs no further comments as already replied above.
- F. Incorrect & not admitted.** No cogent proof, order & Judgment has been attached by the appellant in support of his plea before this Learned Bench, hence, denied.
- G. Incorrect & not admitted.** The plea of the appellant is without any legal substance, hence, liable to be rejected.
- H. Incorrect & not admitted.** The act of the Department is legal and even in accordance with the mandatory provisions of Article 38 (e) of the constitution of 1973.
- I. Incorrect & not admitted.** The appellant has been treated as per law, rules & policy in view of the mandatory provision of Articles-4, 25 & 27 of the constitution of 1973 by the Department.
- J. Legal:** However, the Respondents also seek leave of this Honorable Court/Tribunal to submit additional grounds, record & case at the time of arguments.

Therefore, in view of the above made submissions, the appeal in hand may kindly be rejected in favor of the Department in the interest of justice.

Dated. 30 / 12 /2022.


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


DIRECTOR
 E&SE Department Khyber
 Pakhtunkhwa, Peshawar.
 (Respondent No: 3)

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

Service Appeal No: 1278/2022

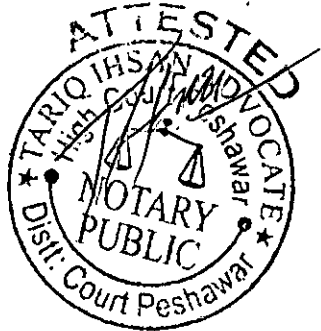
Muhammad Israr, Ex- HM BPS-17 District Malakand.....Appellant.

VERSUS

Government of Khyber Pakhtunkhwa through the Secretary
(E&SE) Department & other.....Respondents

AFFIDAVIT

I. Dr. Hayat Khan Assistant Director (Litigation-II) E&SE
Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on
oath that the contents of the instant para wise Comments are true & correct to
the best of my knowledge & belief.




Deponent



**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

BRIEF IN SERVICE APPEAL NO: 1278/2022 UNDER CASE TITLED


Muhammad Israr, Ex- HM BPS-17 District Malakand.....Appellant.

VERSUS

**Government of Khyber Pakhtunkhwa through the Secretary
(E&SE) Department & otherRespondents**

1. That the appellant was appointed as CT Teacher vide order 13-8-1986, latter on he was promoted to the post of SST vide order dated 06-02-1990 and further promoted to Head Master (BS-17) on 01-07-1998.
2. That vide order dated 30-3-2009 the appellant was allowed annual increments/running pay to the untrained period, however, now he has filed the titled appeal before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar for the grant of benefits of untrained period w.e.f. 20-09-1974 to 13-08-1986 for which he is not entitled on the grounds that the Notification dated 30-3-2009 of the Finance Department was issued with immediate effect with no order of grant of back benefits to the appellant.

***Therefore, the case is hereby submitted for perusal & Counter
Signature as a Respondent in the titled case please.***


**Assistant Director (Lit-II)
E&SE Khyber Pakhtunkhwa
Peshawar**

5

A (S) (22)

O R D E R.

Consequent upon the creation of the post of Lawyer Magistrate for Malakand Agency and in view of the fact that no post of a clerk has been sanctioned by the Government for the said officer, M. Mohammad Israr s/o Fazli Karim of Skhakot (Malakand Agency) is hereby appointed against the existing vacancy of a pupil teacher @ Rs. 150/- P.M. fixed plus Rs. 35/- as cost of living allowance admissible to other employees of the Fund. His appointment is purely temporary and can be terminated at any time without assigning any cause. *He shall work in the office till further orders.*

Sd/-
Political Agent, Malakand.

No. 2180 /GG/2, Dated Malakand the 28 /9/4.

Copy forwarded to Mr. Mohammad Israr s/o Fazli Karim of Skhakot (Malakand Agency) for information.

L. Rahman
Political Agent, Malakand.
H. U.

ATTESTED

چارچہ رپورٹ

(21) (6)

بین ۲۰/۹/۱۹۷۴ قبل از دوپہر اد ڈرغی ۲/۶۵/۲۱۸۰
مورخہ ۲۰۰۹-۱۹۷۴ آمدہ از دفتر پولیسکل ایجنٹ صاحب
گورنمنٹ لوئر میڈل سکول غنی ڈھری ملہ کنڈا ایجنسی میں اپنے
P.T.C پوسٹ کا مکمل چارج سنبھال لیا۔
لہذا اطلاع عرض ہے

دستخط چارج گیر بندہ
20.9.1974

دستخط چارج دہندہ
HEAD TEACHER
Govt. Lower Middle School
Ghand Dheri, Dist: Agency
20.9.1974

ATTESTED

7 (15)

"B"

(9)

GOVERNMENT OF INDIA - 1957

CERTIFICATE OF TRANSFER OF CHARGE.

1. Certified that we have on the ^{F.N.I.} 21st 1956 respectively made over and received charge of the Office of the ^{Head of Section - Intelligence and Agency Transfer} ~~Head of Section - Intelligence~~ ^{Order issued from R.D.E.C. No. 1000}

2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:-

Order No 10153-60/A-1/K-T dt: 13/8/56

Signature of relieved Government servant: *vacant post*

Designation: C.T.

Station: *Siddhantib*

Signature of relieving Government servant: *Mahesh*

Designation: C.T.

Dated: 21/8/56 (F.N.I.)

Forwarded to the N.W.F.P. Security No. 41

10
HEAD MASTER
611
Muzungu

SR

46
8
"C"-(

APPOINTMENT/ ADJUSTMENT.

Consequent upon on turn of merit the following adjustment of trained B.Ed are heroby ordered on their own pay and grade of Rs. 1165/- P.S fixed in EPS: No. 15 plus usual allowances which ever is beneficial to them w.e. from the date of their taking over charge with the following terms and conditions :-

S.NO.	NAME/ADDRESS/GRADE	SCHOOL.	REMARKS
1.	Mr. Gul Zaman, B.Sc, B.Ed 65/86/85, S/O Akbar Zaman, Vill; Allahdand, Mkd.	GMS: Sankoot, Dir.	Against the post already occupied by him.
2.	Mr. Hidayatur Rahman, B.Sc, B.Ed, 523/1000/86, CT GMS: Piran, Mkd;	GMS: Nayaz, Dir.	Vice Akbar-alam, SMT.
3.	MR. Bekht Karim Shah, B.Sc, B.Ed, 535/1000/87, SMT, GMS: Kawga, Swat.	GMS: Kawga, Swat.	Against the post occupied by him.
4.	Mr. Mohammed Nazar, BA/B.Ed, 455/1000/80, CT GMS: Jalala, Mkd;	GMS: Haji Abad, Dir.	A.V. Post.
5.	MR. Bahri Karim, BA/B.Ed/616/1200/85, PTC GMS: Julagarm, Mkd;	GMS: Thali, Dir.	-do-
6.	Mr. Miamatullah, BA/B.Ed, 531/1000/84, CT, GMS: Totana Bandai, Swat.	GMS: Olander, Swat.	Vice Akbar-Jan SMT.
7.	Mr. Nasser Khan, BA/B.Ed, 463/1000/86, CT, GMS: Jewar, Tahsil Takht Bahar, MRP;	GMS: Hayasora, Dir.	A.V. post.
8.	Mr. Mohammad Younis, BA/B.Ed, 439/1000/86, CT GMS: Apora, Swat.	GMS: Amawar, Swat.	-do-
9.	Mr. Bakhti Akbar, BA/B.Ed, 438/1000/86, PTC, GMS: Deolai, Swat.	GMS: Shung, Swat.	-do-
10.	Mr. Mohammed Sher Bahadar, BA/BEd, 438/1000/86, L.C.S. EO (M) Swat.	-do-	Vice Aqal-Mand SMT.
11.	Mr. Naik Mohammad, BA/B.Ed, 437/1000/86, S/O Abdul Hamid, Vill; Mirp Gulandai, Swat.	GMS: Piran, Swat.	A.V. Post.
12.	Mr. Saed Gul, BA/B.Ed, 434/1000/86, SV, GMS: Dir.	GMS: Michina, Dir.	-do-
13.	Mr. Insaour Rahman, BA/B.Ed, 431/1000/86, CT, GMS: Bidwan Dir.	GMS: Mirp, Swat.	-do-
14.	Mr. Alamgir, BA/B.Ed, 431/1000/86, CT GMS: Angara Shori Swat.	GMS: ...	-do-
15.	Mr. Sayed Hussain, BA/B.Ed, 430/1000/86, CT GMS: Ziarat Talush, Mkd.	GMS: ...	-do-
16.	Mr. Habibur Rahman, BA/B.Ed, 429/1000/86, GMS: Song Hasham Dara, Dir.	GMS: ...	-do-
17.	Mr. Ghulam Farooq, BA/B.Ed, 428/1000/86, CT GMS: NO.1 Chana, Mkd;	GMS: ...	-do-
18.	Mr. Mohammed Ali Jan, BA/B.Ed, 428/1000/86, CT GMS: NO.3 Hingora, Swat.	GMS: Olander, Swat.	-do-
19.	Mr. Mohammed Idrees, BA/B.Ed, 428/1000/86, CT GMS: Aman Kot, Swat.	GMS: Ranjal, Swat.	-do-
20.	Mr. Fazal Khaliq, BA/B.Ed, 428/1000/86, SV, GMS: Ramora, Dir.	GMS: Jughaband, Dir.	-do-
21.	Mr. Mohammad Zafar Khan, BA/B.Ed, 426/1000/86, Vill; Spine Poshwar Bagh, Dir.	GMS: Patrak, Dir.	-do-
22.	Mr. Mohammed Israr, BA/B.Ed, 426/1000/86, CT GMS: Sakhatkot, Mkd;	GMS: Jalal, Dir.	-do-
23.	Mr. Ghulam Habib, BA/B.Ed, 426/1000/86, CT GMS: Shori Talush, Dir.	GMS: Patrak, Dir.	-do-

(SEE NEXT PAGE)

24. Mohammad Jamil, B./D. No. 426/1000/
B6, CT GR: Tot: 171, Smt.

GR: Ghazipur, Chit:

A.V. Post.

25. Mr. Dilbar Khan, BA/B. No. 324/1000/86,
CT GR: Nazi Kharkh, Mardan.

GR: Birsitor, Chit:

KDO-

26. Mr. Mohabat Khan, BA/B. No. 422/1000/86,
CT GR: Sakhsak, Mard.

GR: Gusan, Chitral.

-cc-

9
15
10/11

TERMS AND CONDITIONS.

1. No T/D is allowed.
2. Charge reports should be submitted to all concerned.
3. The Heads of the institutions are required to check original Educational qualification/Domicile certificates before handing over charge to them.
4. The regularization of post will be taken later on.
5. They will not claim seniority over their seniors.
6. The newly appointees are required to produce their age and health certificates from the Medical Superintendents concerned and no pay cut shall be drawn until unless they produce the certificates from the officer concerned.
7. In case the candidates fails to join the post within 15 days of the issue of this order, their appointment shall stand automatically cancelled.
8. The posting / appointments are purely on temporary basis and liable to termination without notice or reason.
9. The newly appointees may not be given charge of post if his/ their age below or exceed 35 years.

(CHUGLAK HAZARA)
DIRECTOR OF EDUCATION (SCHOOLS)
M.A. : CIV: 41 GULKANA

Order No. 517-657 / 14/ Merit/1990.

dated Thida Shahr the 11/3/90

- Copy is forwarded to:-
1. The Director of Education (S) M.A.P. Peshawar.
 2. All the Divisional Director of Education (S), in M.A.P.
 3. All the Distt: Education Officers in Malakand Division.
 4. All the Distt: Agency Accounts Officers in Malakand Division.
 5. The Headmaster concerned.
 6. The M.A. S.D. D.O (M) concerned.
 7. The candidate concerned.
 8. The Supdt: (S) local Office.
 9. Copy for P/file.

[Signature]
DIRECTOR OF EDUCATION (SCHOOLS)
MALAKAND DIVISION
GUL KANA PESHAWAR. *[Signature]*

H. RASOOL KHAN
121990.

(For use in Police Department only)

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. dated received back

Left thumb-impression.

Qualifications

Date

Qualifications

Date

English Passed SSC Examination from

Pashito B.E. Peshawar Under Roll No. 14500 in Session 1971

Result declared on 31-7-1971

Plan - ~~...~~ Educational Officer

Finger print Passed BA Examination from

B.E. Peshawar Under Roll No. 6578 in Session 1973

Court duties Result declared on 22-1-1973

Reserve duties Passed MA (Pashito) Roll No 1230 marks 383

Result declared on 15-2-84

First Arts Result declared on 13/9/1988

B.L. or B.A. Peshawar University Roll No. 2568

Pleadership examination 1978

Training School for Educational Officers examination

Other qualifications

Passed BA Examination from Peshawar University

Exam result was declared on 17/11/1984

Dist. Director, Education, Peshawar

N.B - Allow to be drawn under the qualification possessed

ATTESTED

(14)

Note.—The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated.

1. Name

Mohammad Issar

2. Race

Afghan

3. Residence

Sikhato, Kala Kand Agency

4. Father's name and residence

Fazl Karim, vill. Sikhato, Tehsil Dargaj, Dist. ...

5. Date of birth by Christian era as nearly as can be ascertained

26-6-1953 (Twenty six June 1953)

6. Exact height by measurement

5'-6"

7. Personal marks of identification

Small mark on right side of forehead

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

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant

M. Issar

10. Signature and designation of the Head of the Office, or other, Attesting Officer

[Signature]

[Signature]

ATTESSED

Home 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 Art. 371 C. S. R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government Muzant
IV Post	(Rs. 150/- PM fixed)						
Govt. Lower Middle School, Ghansi Dhar (Missions Agency)	21/11/63	-	Rs. 154 PM fixed	-	-	20/9/74	M. D. S. S. S.
Govt. P.M. School, Sankhikhal- No. 1	10/11/63	calling offered	3137 PM	-	-	12/12/73	M. D. S. S. S.
S. D. E. 90, Malakunda							
CT Post at GHS, Sankhikhal	27/11/63	BPS No. 9 (620-29-1200)	Rs. 707 PM	-	-	21/8/86	M. D. S. S. S.
do	do		Rs. 736 PM	-	-	12/8/87	M. D. S. S. S.
do	do	Revision of pay scales					
do	do	BPS No. 9 (830-38-1580)					
do	do		Rs. 982 PM	-	-	7/8/87	M. D. S. S. S.
do	do		Rs. 1020 PM	-	-	12/8/87	M. D. S. S. S.
do	do		Rs. 1058 PM	-	-	12/8/88	M. D. S. S. S.

M. D. S. S. S.

9	10	11	12	13	14	15
				Leave		
				Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government		Reference to any recorded punishment or censure or reward or praise of the Government servant
				Nature and duration of leave taken	Period to which debitable	
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	Reasons of termination (such as promotion transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer			
S. D. E. O. Malakand.	8-12-78	Transfer	S. D. E. O. Malakand.	① Appointed as Untrained (P.T.) teacher @ Rs. 150/- per m. fixed at S. M. S. School, Dheri, P.A., Malakand. vide order No. 2180/G.O. dated 29-7-74.		Divisional Education Officer MALAKAND.
S. D. E. O. Malakand.			S. D. E. O. Malakand.	Transfer from S. S. Sakhselat. Appointed against CT ad. P. H. Sakhselat vide Director Education (School) Malakand Division at Swat. Endst No. 16157-60/A-I/CT dated 13/8/86.		Divisional Education Officer MALAKAND.
Principal Govt. High School No. 1 Sakhselat Mkd Agency			Principal Govt. High School No. 1 Sakhselat Mkd Agency	② Service verified from 30 ² / ₇₁ to 9 ¹² / ₇₈ from the appointment and other office record.		Divisional Education Officer MALAKAND.
Principal Govt. High School No. 1 Sakhselat Mkd Agency			Principal Govt. High School No. 1 Sakhselat Mkd Agency	③ Service from 21-8-86 to 31-12-86 verified from appointment roll & other office record.		Divisional Education Officer MALAKAND.
Principal Govt. High School No. 1 Sakhselat Mkd Agency			Principal Govt. High School No. 1 Sakhselat Mkd Agency	④ Service from 01-87 to 31-12-87 verified from appointment roll & other office record.		Divisional Education Officer MALAKAND.
Principal Govt. High School No. 1 Sakhselat Mkd Agency			Principal Govt. High School No. 1 Sakhselat Mkd Agency	⑤ Service verified from 1 ¹² / ₈₁ to 20 ⁸ / ₈₆ from the office record.		Divisional Education Officer MALAKAND.

S. D. E. O.
MALAKAND.

S. D. E. O.
MALAKAND.

ANNEXURE

Sl. No.	Name of post	Whether substantive and whether appointment or temporary	If officiating (a) substantive (b) substitute (c) whether appointed or served counts under Art. 371 of B. P.	Pay in substantive post	Additional pay for officiating	Other emoluments under the appointment	Date of appointment	Signature of Government servant
1	CP Post of E.H.S			RS = 1096/PM			1/12/90	
2	Said Post			RS = 1351/PM			01/02/90	
3	SET/GHS Jala			1165/-			7/2/90	
4	Sup. Insp.			1165/-			1-12-90	
5	1375 No: 15-1165-11-2565			1286/-			1-12-90	
6	1882/-			1882/-			1/6/91	
7	1307/-			1307/-			11/12/91	
8	2013/-			2013/-			13/9/92	
9	2144/-			2144/-			1/12/92	
10	2285/2285/-			2285/2285/-			1/11/92	
11	2285/2285/-			2285/2285/-			9/7/94	
12	2285/2285/-			2285/2285/-			1/5/94	
13	2285/2285/-			2285/2285/-			1/5/94	
14	2285/2285/-			2285/2285/-			1/5/94	
15	2285/2285/-			2285/2285/-			1/5/94	
16	2285/2285/-			2285/2285/-			1/5/94	
17	2285/2285/-			2285/2285/-			1/5/94	
18	2285/2285/-			2285/2285/-			1/5/94	
19	2285/2285/-			2285/2285/-			1/5/94	
20	2285/2285/-			2285/2285/-			1/5/94	

14
15

(B)

10	11	12	13	14	15	16
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	Reasons 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	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
				Leave		
				Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable	
Principal Govt. High School No.1 Sakhakot Mkd. Agency			Transfer of Principal SET on 6/2/90.		appointed SET post at GHS Jelav Dir vide Director of Education (School) Malakand Division at Lulakada-Swch endst- No-517-657/A-14 dated	Head Master GHS Jelav District Dir Upper Islam Rd
Principal Govt. High School No.1 Sakhakot Mkd. Agency						
Head Master GHS Jelav Dist. Dir Upper	30/11/90	And not	Head Master GHS Jelav Dist. Dir Upper			
Head Master GHS Jelav Dist. Dir Upper	30/11/90	Service from verified from acquittance roll & other office record	Head Master GHS Jelav Dist. Dir Upper	6-2-90	01/2/190	
Head Master Govt. High School Mehordi Mkd. Agency	30/11/91	And not	Principal GHS No.1 Sakhakot		6-2-90	Head Master GHS Jelav District Dir Upper 6-2-90
Head Master Govt. High School Mehordi Mkd. Agency	11/9/92	Transfer to GHS Kaudaro (Mkd.) Dir	Head Master Govt. High School Mehordi Mkd. Agency			Head Master GHS Jelav District Dir Upper
Head Master Govt. High School Mehordi Mkd. Agency	30/11/92		Head Master Govt. High School Mehordi Mkd. Agency			
Head Master Govt. High School Mehordi Mkd. Agency	30/11/93		Head Master Govt. High School Mehordi Mkd. Agency			2 Service verified w.e.f. 13.9.92 to 8.1.1994 From office record
Head Master Govt. High School Mehordi Mkd. Agency	8/1/94	Transfer to GHS Mehordi Mkd. Agency	Head Master Govt. High School Mehordi Mkd. Agency			DIRECTOR GENERAL ELUC. & S.W. DEPT. DIR. GOWAN
Head Master Govt. High School Mehordi Mkd. Agency	30/11/94	Transfer to GHS Mehordi Mkd. Agency	Head Master Govt. High School Mehordi Mkd. Agency			
Head Master Govt. High School Mehordi Mkd. Agency	30/11/95		Head Master Govt. High School Mehordi Mkd. Agency			
Head Master Govt. High School Mehordi Mkd. Agency	30/11/95		Head Master Govt. High School Mehordi Mkd. Agency			
Head Master Govt. High School Mehordi Mkd. Agency			Head Master Govt. High School Mehordi Mkd. Agency			

RECEIVED

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9	10	11	12	13	14	15
Signature and designation of the head of the office or other attracting officer to whom intimation 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	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
<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>3rd Oct 1995 8-2-95 12-9-95</p>	<p>Reason of termination Annual increment</p>	<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>Leave Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or reward or praise of the Government servant</p>
<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>30/11/1995</p>	<p>Annual increment</p>	<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>Leave</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or reward or praise of the Government servant</p>
<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>30/11/1996</p>	<p>Annual increment</p>	<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>Leave</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or reward or praise of the Government servant</p>
<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>30/11/1997</p>	<p>Annual increment</p>	<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>Leave</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or reward or praise of the Government servant</p>
<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>30/11/1998</p>	<p>Annual increment</p>	<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>Leave</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or reward or praise of the Government servant</p>
<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>30/11/1998</p>	<p>Annual increment</p>	<p>Signature of Head Master Govt. High School Mehardi Mkd. Agency</p>	<p>Leave</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or reward or praise of the Government servant</p>

8) Service verified w.e.f. 9-1-1994 to 12-9-1995 From his office record.

9) Service verified w.e.f. 13/8/1995 to 30/11/96.

10) Service verified w.e.f. 1/96 to 30/11/1997.

11) Service verified w.e.f. 1/97 to 30/6/98.

Holding transferred to Gazetted post w.e.f. 17/11/1998 as SET vide charge Report No. 111 dated 1-7-1998

Handwritten signature or initials at the bottom right of the page.

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9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 3	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 Allocation of periods of leave on average pay upto four months for which leave salary is payable to another Government Government to which referred	14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure or reward or praise of the Government servant
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Notification / order

The Competent authority has been
 please forward/sanction for
 Propagation Duplicate service
 in respect of Muhammad Iqbal
 S/O Fazal Karim which has
 been misplaced from Record
 of this office and with no
 with Director of EOSE, KPK.

Reference No. F-1043/13
 4353-58/F.No.356/SET/14/1
 Dated 21/3/2013

S. Sami
 PRINCIPAL
 G.H.S. No. 2
 Sakhal, M.K.D.

1. Certified that the official has not been terminated/suspended during service.
2. Certified that the official has not been granted leave without pay during entire service.
3. Certified that the official has not been obtained any Long Term Advance i.e. HBA/Motor Cycle during service.

4. Certified that the official has not been obtained pension claims in previous Service Book during service.

ATTACHED

S. Sami
 PRINCIPAL
 G.H.S. No. 2
 Sakhal, M.K.D.

(5)

E

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Attention: Mrs. Madina Rehman

E-20

02 04 2009 13:57 FAX 0010210352

SSF FD Peshawar

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

NO.FD (PRC) 5-2/2002
Dated Peshawar the: 30-03-2009

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

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

Dear Sir,

I am directed to refer to your letter NO.SO (B&A) 1-16/08/
Advance Increment dated February 27, 2009 on the subject noted above and
to state that the Provincial Government is pleased to allow the benefit of
annual increments to the untrained teachers from the date of their regular
appointment.

No arrears shall however, be admissible / payable prior to the
date of issuance of this circular.

(ABDUL JABBAR)
SECTION OFFICER (SR-1)

Encls: of even No& date.

Copy for information & necessary action to the:

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

SECTION OFFICER (SR-1)

ATTESTED