

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1712/2019

Date of institution 26.11.2019

Mujeeb-ur-Rehman S/O Payo Khan R/O Tribe Sher Khan Khel Dagory
P/O Tehsil Jamrod Khyber Agency Peshawar.

VERSUS

The Principal, Government Elementary College Jamrod Khyber Agency
and three others.

ORDER

11.11.2021

Appellant alongwith is counsel Mr. Taimur Ali Khan, Advocate,
present. Mr. Noor Zaman Khattak, District Attorney for the
respondents present.

Learned counsel for the appellant stated at the bar that the
issue of up-gradation is involved in the instant appeal and as per
judgment of august Supreme Court of Pakistan, this Tribunal has got
no jurisdiction in the matter, therefore, he wants to withdraw the
instant appeal with the permission to approach proper forum for
redressal of grievance of the appellant. In this respect, he submitted
written application, which is placed on file.

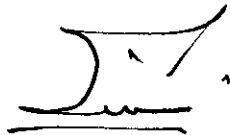
In view of the above, the appeal in hand stands dismissed as
withdrawn, however the appellant may approach the proper forum for
remedy available to him under the law. Parties are left to bear their
own costs. File be consigned to the record room.

ANNOUNCED

11.11.2021



(Atiq-Ur-Rehman Wazir)
Member (Executive)



(Salah-Ud-Din)
Member (Judicial)

Before the KP Service Tribunal, Peshawar

Appeal NO. 1712/2019

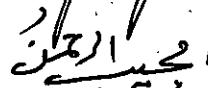
Majeed Us Rehman VS Education Deptt.

Subject: Application for withdrawal of instant appeal to ~~the~~ approach the proper forum.


Respectfully Sheweth:

- 1) That instant appeal is pending before this Honorable Tribunal, however, the issue related in the instant appeal is about upgradation, but as per Supreme Court judgment, the Tribunal has no jurisdiction in the issue of upgradation.
- 2- That the appellant wants to withdraw the instant appeal to approach the proper forum.

It is therefore most prayed that on the acceptance of this application, the instant appeal may kindly be withdrawn and allowed the appellant to approach the proper forum.


Appellant

through:



Taimul Ali Khan
Adm

13.10.2021

Taimur Ali Khan Advocate present and submitted Wakalat Nama in favor of appellant.

Asif Masood Ali Shah, learned Deputy District Attorney for respondents present.

Being freshly engaged, learned counsel for appellant made a request for adjournment. Request is accorded. To come up for arguments on 11.11.2021 before D.B.



(Atiq-Ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

01.02.2021

Due to COVID-19, the case is adjourned to 13.04.2021 for the same.


Reader

13.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 30.07.2021 for the same as before.

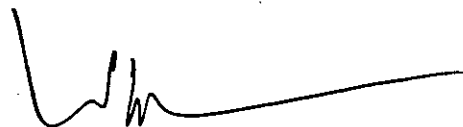


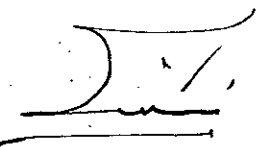
READER

30.07.2021

Mr. Noman Khalil, Advocate, junior of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.


Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to appear before the Tribunal today due to illness. Adjourned. To come up for arguments before the D.B on 29.09.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

29-9-21

Due to non Availability of the
concerned DB the case is
adjourned to 13-10-2021


Reader

22.07.2020

Junior counsel for the appellant is present. Mr. Kabirullah Khattak, Additional for the respondents is also present.

Learned Additional AG seeks time to contact the respondents and submit reply/comments. Adjourned to 14.09.2020 on which date the requisite reply/comments shall positively be furnished.

(MUHAMMAD JAMAL KHAN)
MEMBER

14.09.2020

Appellant in person and Addl. AG alongwith Abdul Amin, Senior Clerk for the respondents present.

Respondents have furnished joint parawise comments which are made part of the record. The appeal is assigned to D.B for arguments on 18.11.2020. The appellant may furnish rejoinder, within a fortnight, if so advised.

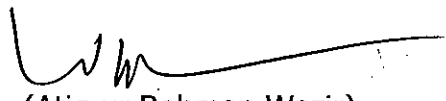

Chairman

18.11.2020

Appellant present through counsel.

Muhammad Jan learned Deputy District Attorney alongwith Muhammad Ullah Jan Vice Principal for respondents present.

Former made a request for adjournment. Adjourned. To come up for arguments on 01.02.2021 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

18.02.2020

Appellant in person present and seeks adjournment as his counsel is not available. Adjourn. To come up for preliminary hearing on ^{17.03.2020} 2020 before S.B


Member

17.03.2020

Learned counsel for the appellant present.

Contended inter-alia that the appellant was appointed as Tube-Well Operator in BPS-01 in the year 1995 and his fellows were given promotion however the appellant is still in BPS-01.

Submissions made by the learned counsel for the appellant, need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 07.05.2020 before S.B.


Member

07.05.2020. Due to public holidays on the account of Covid-19, the case is adjourned. To come up for the same before SB on 22.07.2020.




Appellant Deposited
Security & Process Fee


Reader,

FORM OF ORDER SHEET

Court of _____

Case No. - 1712/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/12/2019	<p>The appeal of Mr. Mujeeb-ur-Rehman resubmitted today by Malik Aurangzeb Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 9/12/19</p>
2-	10/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/01/20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	08.01.2020	<p>Appellant present in person. Requests for adjournment due to general strike of the Bar. Adjourned to 18.02.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>


18
stay?

The appeal of Mr. Mujeeb-ur-Rehman son of Payo Khan r/o Tribe Sher Khan Khel dagory Jamrud received today i.e. on 26.11.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not in proper shape/form.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Affidavit may be got attested by the Oath Commissioner.
- ⑤- Copy of Impugned order and departmental appeal against it are not attached with the appeal which may be placed on it.
- ⑥- Law under which appeal is filed is not mentioned.
- 7- Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2070 /S.T,

Dt. 27-11- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Malik Aurang Zeb Adv. Pesh.

*Note: 3 impugned order, application as well as high court decision is attached
under section 3 and 4 of service Tribunal Act
All the objections removed
Aurang Zeb Adv. Pesh.*

BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR

Appeal No = 1712/2019

Mujeeb Ur Rehman

VERSUS

The Principal Govt. Elementary Collage and others

INDEX

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Through

سید ابرار
Appellant

19
121

Aurang Zeb
Advocate High Court
Peshawar

MALIK AURANG ZEB

Advocate, High Court Peshawar,

Cell # 0336-9199285

(12)

IN THE COURT OF CHAIRMAN SERVICE TRIBUNAL KPK

Appeal No 17124 **PESHAWAR** 2019

Mujeeb Ur Rehman S/o Payo Khan R/o Tribe Sher Khan khel
dagory P/o Tehsil & Jamrod Khyber Agency Peshawar.

Applicant

Versus

1. The principal, Govt Elementary College Jamrod Khyber Agency.
2. Director of Education FATA KPK, Peshawar
3. Secretary of Education FATA, KPK Peshawar
4. Political Agent (Khyber Agency) at Peshawar.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1684

Dated 9/11/2019

Respondents

SERVICE APPEAL UNDER SECTION 4 OF KPK, SERVICE TRIBUNAL ACT 1974 WHEREBY EMPLOYEE OF FATA, ELEMENTARY COLLEGE SINCE 29TH JULY 1995 AND HE IS STILL IN CLASS IV SINCE APPOINTMENT MENTIONED ABOVE AND THE APPEAL TO DEPARTMENT IS IGNORED AND NO ORDER REPLY WAS GIVEN TO THE APPELLANT.

PRAYER:

ON ACCEPTANCE OF THIS INSTANT SERVICE APPEAL AND WITHOUT GIVEN ANY OPPOSITE AND NEGATIVE REMARKS MENTIONED IN SERVICE RECORD, HE MAY BE GIVEN PROMOTION TO GRADE SEVEN OR UP GRADATION OR WHAT IS PROPER IN THE EYES OF LAW.

Court Fee: 500

Respectfully Sheweth:

1. That the petitioner is by birth domiciled of Khyber Agency Peshawar
2. That the petitioner has left the school in primary class due to poverty, and unable to bear the school expenses at Primary school Jamarod Khyber Agency.

Annex-A

Annex-B

Filed to-day
Registrar

26/11/19

Re-submitted to -day
and filed.

Registrar 9/12/19

2

3. He obtained Electrician diploma from internal chief industries LTD Hayatabad Peshawar

Annex-C

4. On the basis of such diploma the petitioner was appointed on a post against class-IV in scale-I.

Annex-D

5. That the petitioner is doing his job regularly and obediently and no single remarks has been placed against him in his service record.

Service Book Copy Annex-E

6. That the petitioner has contacted the respondents and at the last through his council dated 2nd April 2018, but no fruitful result arose.

Annex-F

7. That his other fellow were given promotion to scale in Fata Education Department.

Annex-G

8. That the respondents did not reply and showed silence that is why petitioner approaches to this Hon'ble court for his relief.

9. That the parties belong to KPK. That is why court has jurisdiction to entertain it.

10. That the petitioner filled a writ petition in High Court but the High Court gave direction to approach proper forum file this petition.

11. I hope this court will do justice and will not deny my relief. It is therefore requested that the petitioner may be promoted / up gradation to scale 7 as prayed.

Appellant *Malak Aurang Zeb*
Through Counsel' *Azels*

MALAK AURANG ZEB

ADVOCATE HIGH COURT

PESHAWAR

CELL NO. 0336-9199285

3

IN THE COURT OF CHAIRMAN SERVICE TRIBUNAL KPK
PESHAWAR

Mujeeb Ur Rehman S/o Payo Khan R/o Tribe Sher Khan khel
dagory P/o Tehsil & Jamrod Khyber Agency Peshawar.

Applicant

Versus

1. The principal, Govt Elementary College Jamrod Khyber Agency.
2. Director of Education FATA KPK, Peshawar
3. Secretary of Education FATA, KPK Peshawar
4. Political Agent (Khyber Agency) at Peshawar.

Respondents

AFFIDAVIT

I, Mujeeb Ur Rehman S/o Payo Khan R/o Tribe Sher Khan
Khel dagory P/o Tehsil Jamord Khyber Agency Peshawar,
do hereby solemnly affirm and oath that all the contents of
this application are true and correct to the best of my
knowledge and nothing has been concealed from this
Hon'ble Court.

Mujeeb Ur Rehman
Deponent

A Zeb

Aurang Zeb
Advocate High Court
Peshawar

Identified by
Malak Aurang Zeb
Advocate High Court Peshawar
Cell No. 0336-9199285

Aurang Zeb
Advocate High Court
Peshawar

ATTESTED
Muhammad F. Neen Khan
07/12/19

BEFORE THE PESHAWAR HIGHCOURT PESHAWAR

ADRESSES OF THE PARTIES

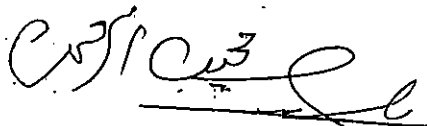
Mujeeb Ur Rehman S/O Payo Khan R/O Tribe Sher Khan Khel
dagory P.O Tehsil Jamroad Khyber Agency Peshawar.

Applicant

VERSUS

- 1) The Principal, Govt Elementary College Jamroad Khyber Agency.
- 2) Director of Education FATA KPK , Peshawar.
- 3) Secretary of Education FATA, KPK, Peshawar.
- 4) Deputy Commissioner District Khyber Agency Peshawar.

Respondents



Appellant Through Council

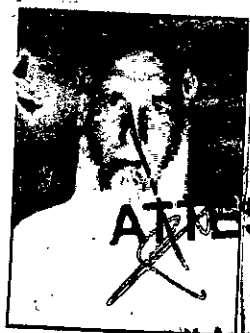


**Malak Aurang Zeb
High Court Peshawar
Ceil No. 03369199285**

FILED TODAY

Deputy Registrar

16 FEB 2019



ATTESTED

Tehsildar Jamrud

Ann-A P-(5) DOMICILE CERTIFICATE

Khyber Tribal District

Certified that Mr./Miss Mujeebur Rehman

Son / Daughter of Paya Jan

Belongs to a recognized tribe of AAzidi

Section Kuki Khan Sub Section Gher Khan Khan

residence / village Malak Abad Jamrud

And his /her father is a permanent bonafied of the Khyber District.

Bech

Verified

Attested

Countersigned

Tehsildar Jamrud
Tehsildar Jamrud

N M
20/7/18

Asstt. Commissioner
Assistant Commissioner
Jamrud Khyber Tribal District
Khyber Tribal District

120/07/2018

Deputy Commissioner
Deputy Commissioner,
Khyber Tribal District

Hanif al

Go 1416/EC
31-7-018

بیان سفید ریشان

ہم مندرجہ ذیل سفید ریشان اس امر کی تصدیق کرتے ہیں کہ

مسمیٰ / مسماة نجیب الرحمان ولد پہاؤ جان

قوم کوچی خیل تپہ شہیر خان خیل ساکن مدد آباد

تحصیل وڈا کھانہ جمروں قبائلی ضلع خیبر کا اصل پیدائشی اور

سکونتی باشندہ ہے۔ قبائلی ضلع خیبر میں جائیداد رکھتے ہیں اور حکومت پاکستان کے وفادار ہیں۔ اور قوم

کے ساتھ نفع و نقصان دونوں میں برابر کے شریک ہیں۔ اور اس ضمن میں ہر قسم کی ذمہ داری قبول کرتے

ہیں۔ نیز اگر مندرجہ بالا تصدیق میں کسی قسم کی غلطی یا جھوٹ پائی گئی تو ہم مبلغ پچاس ہزار (50,000)

روپیہ کلد ارضیہ پاکستانی بطور فی نفر جرمانہ حکومت پاکستان کو ادا کریں گے۔

Shahid

سفیریش

محمد علی

سفیریش

سفیریش گل محمد ولد سلیم خان
شیر خان خیل
0321-9062666
2120255732335

شناختی کارڈ

شناختی کارڈ 21202-6383647-7

محمد علی

سفیریش

محمد علی

سفیریش

شناختی کارڈ 21202-4294288-1

شناختی کارڈ 21202-5640186-9

ATTESTED

Tehsildar Jamrud

21/6/08

A=B
Ann-B

(ک)

قلمی امتحان کے لئے کانسٹریکٹڈ طرز

997305

997305

سکول کورنگ پبلک سکول سولہ بارہ ایجنسی ایف آر فیملی کونسل
طالب علم/طالبہ مجیب الرحمن ولدت بیاض جان

ریجنل پیدائش (بندوں میں) 1975-03-01 لفظوں میں یکم مارچ 1975 سنوت 2

ر رجسٹرڈ نمبر 3367 قوم اردنی

تصدیق کی جاتی ہے کہ مندرجہ بالا طالب علم/طالبہ جو اس مدرسہ میں مورخہ 7-9-85 تک پڑھتا رہا پڑھتی رہی ہے،
اسے ہذا کی کل رقمیں جو اس کے ذمہ واجب الادا تھیں ادا کر دی ہیں اور اسے تاریخ مندرجہ بالا پر اپنا نام خارج کرانے کی اجازت
دی گئی ہے۔

یہ طالب علم/طالبہ جماعت 8 میں پڑھتا رہا پڑھتی رہی تھی اس کا امتحان جماعت 8 میں لیا گیا جس میں اسے پاس/فیل
رہا کیا اس نے بوجھ کھریں مدرسہ چھوڑنے کا سرٹیفکیٹ چاہا تھا اس کا چال چلن درست ہے

جماعت 8 میں لیا گیا

دوران سال		مدت حاضری		مدرسہ ہذا میں	
فیل ہونے کی تاریخ	خارج ہونے کی تاریخ	از	تا	مکنہ حاضریاں	فی الواقع حاضریاں
29/9/1984	7/9/1985	8-4-85	8-9-85	-	

صدر مدرسہ / صدر مدرسہ	انچارج مدرس	مدرسہ / طالبہ کے ساتھ رشتہ	مدرسہ ہذا کے نام اور طالب علم / طالبہ کے ساتھ رشتہ
GPS Jamilah Bazaar Khyber Agency			
			13/3/2018

*** صرف سکالرشپ پانے والے طلباء و طالبات کے لئے ***

سکالرشپ _____ سکالرشپ کا مقدار _____ تاریخ ادائیگی _____
س تاریخ تک ادا کیا گیا کون رہا ہے

دفتر صدر مدرسہ / معلمہ _____ سکول _____ ایجنسی ایف آر _____ مقام صدر مدرسہ / معلمہ _____ سکول _____
طالب علم / طالبہ _____ جماعت _____ داخلہ نمبر _____ کے متعلق ذیل کوائف سے مطلع کیجئے
دستخط صدر مدرسہ / معلمہ _____

تصدیق کی جاتی ہے کہ مطلوبہ کوائف در سلسلہ _____ ولد / بنت _____ داخلہ نمبر _____ جماعت _____
مدرسہ ہذا کے ریکارڈ کے مطابق درج کر کے واپسی ارسال ہیں۔
دستخط صدر مدرسہ / معلمہ _____

تکامل فروخت" نکامات تعلیمات قبائلی علاقہ جات (قانا) صوبہ سرحد
سوالیہ پرچہ جات، فارم، رجسٹرات اور سکول نیوز کا مفروضہ مرکز۔ (غزالی پبلیکیشنز، چار سدا ٹاؤن)



INTERNATIONAL
GHEE INDUSTRIES LTD.

Ann - C
(7)

Our Ref. No. _____

Date 16.7.95

TO WHOM IT MAY CONCERN

Certified that Mr. Mujeebur Rehman S/O Paya Jan is working in this Organisation as Electrician/Pump Operator since 7.10.1992.

During this period he is found punctual, honest and hard worker.

We wish him a bright future.

Azeel
ATTESTED

D ted 16.7.95

Pervez Ahmed
Mr. Zeb

Project Manager

PERVEZ AHMED
PROJECT MANAGER

Ann-D

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OFFICE OF THE PRINCIPAL GOVT. ELEMENTARY COLLEGE JAMRUD (KHYBER AGENCY).

APPOINTMENT.

Office order NO 13

Dated Jamrud the 29.7.1995.

Reference Political Agent Khyber Agency Endst NO. 5085 dated 25.7.1995 Mr. Majeedur Rehman S/O Payo Jan Kuki Khel Sher Khan Khel of Jamrud is hereby appointed against the newly created Post of Tube-Well Operator B.P.S. NO I 1-a(1245-35-1770) plus usual allowances as admissible under the rules w.e. from 29.7.1995 or the date of taking over charge of his duty.

Note:- The appointment of the above named candidate is purely on temporary basis and is liable to termination at any ^{time} without notice and without assigning any reason. In case he wishes to resign at any time he will have to submit one month's pay prior notice or will have to forfeit one month's pay to the Govt. in lieu thereof.

2:- He is required to produce his health and age Certificate from the civil Surgeon concerned and no pay will be drawn to him until he produce the same.

3:- Good conduct certificate on affidavit from D/O D.S.P. concerned.

[Signature]
PRINCIPAL,
Govt. Elementary College (M),
Jamrud (Khyber Agency).

Endst: NO: 3440 / Dated GEC Jamrud the 29.7 / 1995.

Copy forwarded to the:-

- 1:- Director of Education (FATA) NWFP Peshawar for information please.
- 2:- Agency Account's officer Khyber Agency at Peshawar.
- 3:- ~~Official concerned~~ P.A. Khyber for information.
- 4:- Official concerned.

-sd-
PRINCIPAL,
Govt. Elementary College (M),
Jamrud (Khyber Agency).

A/c

Ann ^E L NO = 17
PNO: 173

D# 00412076

P (9)

SERVICE BOOK

OF

Mr. Mujeeb-ur-Rehman
Tube-Well Operator.

N.I.C. No 21202-6832499-5

Aish

Price : Rs. 10.00

P-10

N.W.F.P. Med. No.4

GS&PD-NWFP-596 F.S. 2,000 Ps of 100-129.91(19)

MEDICAL CERTIFICATE.

Name of Official *Mujeeb-ur-Rahman*

Caste or race *Shiadi (Muslim)*

Father's Name *Pir-e-Jau*

Residence *Mahle Khad Tehsil Jamrud
Khyls Agency*

Date of birth *3-3-1971*

Exact height by measurement *5'5"*

Personal mark of identification *Linear Scar on Ventral Surface of*

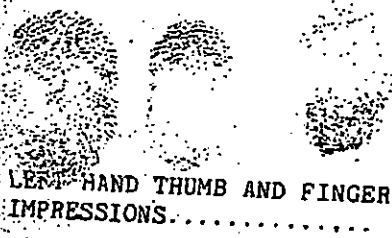
Signature of the Official *[Signature]*

Signature of head of office *[Signature]*

Seal of Office

I do hereby certify that I have examined Mr. *Mujeeb-ur-Rahman* a candidate for employment in the office of the *Elementary College Jamrud* and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except *nil*.

I do not consider this as disqualification for employment in the office of the *Elementary College Jamrud* His age according to his own statement *24* years and by appearance about *24* years.



[Signature]
01-8-95
Medical Superintendent,
Civil Hospital,

Note: The entries in this page should be renewed or re-attested at least every three years and the signature to lines 9 and 10 should be dated.

1. Name .. Mr Mujeebur Rehman

2. Race .. Kuki Khel Afiridi

3. Residence .. Village Malak Abad Jamrud Teh. P.O
Jamrud (Khyber Agency)

4. Father's name and residence .. Mr Payo Jan.

5. Date of birth by Christian era as nearly as can be ascertained .. 03-03-1971

6. Exact height by measurement .. 5-6

7. Personal marks for identification .. Linear Scar on ventral surface of

8. Left hand thumb and Finger impression of (non-gazetted) officer .. Lt. F. Arim.

Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



Roll

9. Signature of Government servant

Signature in Urdu: محمد مجيب الرحمن

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

PRINCIPAL
Govt. College of Education
for Elementary Teachers
(FATA) Jamrud Khyber Agency

Signature of Principal

1	2	3	4	5	6	7	8	9
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 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 servant	Signature & designation of officiating officer
Mujeeb-ur-Rehman	Plum	B/S No (1245)						
Tube-well operator			Rs 1845/-pm			29/7/95	مجيب الرحمن	
Cont. elementary	"		Rs 1980/-pm			1/12/96	مجيب الرحمن	
College Jamrud	"		Rs 1315/-pm			1/12/97	مجيب الرحمن	
(Khyber Agency)	"						مجيب الرحمن	
do	"							
do	"		Rs 1350/-			1/12/98		
do	"		Rs 1385/-pm			1/12/99	مجيب الرحمن	
do	"		Rs 1420/-pm			1/12/00	مجيب الرحمن	
do	"		Rs 1455/-pm			1/12/01	مجيب الرحمن	
Revised Basic Pay Schedule I (1970-55-3570)								
do	"		Rs 2200/-pm			1/12/2001	مجيب الرحمن	
do	"		Rs 2255/-pm			1/12/2002	مجيب الرحمن	

M. E. 3748/2

PT. 2)
4/12/2014

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and position of the head of office or other assessing officer in instances 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 assessing Officer	Period	Government to which debitable	Signature of the head of the office or other assessing officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Service rendered by	Government to which debitable		
	25/7/1982						

Signature of the head of office or other assessing officer in instances 1 to 8

Date of termination of appointment

Reason of termination (such as promotion, transfer, dismissal, etc.)

Jharkhand Agency at Jamshedpur

Service rendered by 1-12-2015 to 29-11-2016

Approval up-gradation of pay scale 10-2-81-7-2015 vide DE F.A.P. Order No. 2467-60 dt. 11-3-2017

[Signature]
PRINCIPAL
Gov. College of Education
For Elementary Teachers (M)
Jharkhand Agency

As a result of award of up-gradation of post in EPS 10-2-81-7-2015 re-fixation of pay scale vide DE F.A.P. Order No. 2467-60 dt. 11-3-2017.

[Signature]
PRINCIPAL

9	10	11	12	13		14	15
				Nature and duration of leave taken	Leave		
					Allocation of period of leave on average pay upto four months for which leave salary is debtable to another Government		
Signature and position of the head of office or other acting officer in continuation of items 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Period	Government to which debtable	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
Principal G.H.C. Jamrud	30/11/96	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/96	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/98	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/89	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/90	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/90	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/90	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/98	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/2002	A: Int.	Principal G.H.C. Jamrud				
Principal G.H.C. Jamrud	30/11/2002	A: Int.	Principal G.H.C. Jamrud				

Appointed against newly created Post of Tube-well operator w.e from 29-7-1995 vide this office order No 13 dated 29-7-1995 (F.N)

Principal
Govt. College of Education
for Elementary Teachers
(FATA) Jamrud Khyber Agency

29-7-95 to 7-10-95

8-10-95 to 12-77

Service from 1-1-98 to 30-11-98

Service from 1-12-98 to 30-11-98 from the office record of this College.

Principal
G.H.C. Jamrud

1	2	3	4	5	6	7	8	9
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 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 officer of Government	Signature of Officer of Government
Mujeeb Rehman T.O.O.	Substantive / Official		Rs=2310/-			12/2003	محمد الرحمان	
-do-	-do-		Rs=2365/- P.M.			18/2004	محمد الرحمان	
Revision of pay on 1/7/2005 BPS 1 (2150-65-4100)								
-do-	-do-		Rs=2735/- P.M.			6/2005	محمد الرحمان	
-do-	-do-		Rs=2800/- P.M.			12/2005	محمد الرحمان	
-do-	-do-		Rs 2865/- P.M.			12/2006	محمد الرحمان	
Pay and Scale Revision BPS-1 to BPS-2 (2535-85-5080)								
-do-	-do-		Rs 3375/- Rs 3380/- P.M.			17/07	محمد الرحمان	
Revision to BPS-2 (2475-75-4725)								
-do-	-do-		Rs 3450/- P.M.			12/2007	محمد الرحمان	
-do-	-do-		Rs 3465/- P.M.			2/07	محمد الرحمان	

P. 914

1	2	3	4	5	6	7	8	9
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 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	Signature of other authority in column 8
Revt (M) Jamrud Tab: opit	Per (Temp)	Pay Revised BPS-2 (3035-100-5080)						
- do -	- do -		b = 4135/-	PM		1 ⁷ / ₂₀₀₈		
Do	Do			Re 4235/- PM		1 ¹² / ₀₈		
<p>Revised entries direct grossing increment up to 1-9-07 vide DE (E & P) HUNTS, Pakistan, No. 11536-500 dt: 5/8/09</p>								
		B-2 (2530-55-5080)		Rs 3350 + 85 = 3435/-		1 ⁹ / ₀₇		
				Rs - - - 3550/-		1 ¹² / ₀₇		
		B-2 (3035-100-6085)				1 ⁷ / ₀₈		
						1 ¹² / ₀₈		
<p>PRINCIPAL, G.C.E.T. (M) Jamrud Khyber Agency.</p>								
Do	Do			Rs 4435/- PM		1 ¹² / ₀₉		
				Rs 4535/- PM		1 ¹² / ₂₀₁₀		
		BTS No-22 (4900-170-16000)				1 ⁷ / ₂₀₁₁		
				Rs 7450/- PM		1 ⁷ / ₂₀₁₁		
				Rs 7620/- PM		1 ¹² / ₂₀₁₁		

(715) 278.42

C.P. P.O. Advance

8	9	10	11	12	13
	OPTIMUM				
Signature of Present Secretary	Signature of the Director of the Office or other existing authority in column 1 to 8	Signature of the Director of the Office or other existing authority in column 1 to 8	Signature of the Director of the Office or other existing authority in column 1 to 8	Signature of the Director of the Office or other existing authority in column 1 to 8	Signature of the Director of the Office or other existing authority in column 1 to 8
	As a result of award of post in 30/11/07				Allocation of period of leave on average upto four months for which salary is payable to another Government
	The rules attached				Reference to any record of payment or award of prize of the Government
	PRINCIPAL				Agency Accounts Officer
	Govt. College of Education for Teachers (M)				Signature of the head of the office or other officer of the Government
	30/11/08				Period to which Government to which debitible
	G. B. G. (Male)				Service verified from 1-1-06 to 31-12-06 from the pay bill & office record of this College.
	Jamrud Khyber Agency				Min. Khair Khan
	T-89				Services verified up to 1-1-07
	17/18				To 30-6-2008 on office record.
	Drawn as per of Spl				
	Increase Rs. 2150/- w.e.f.				
	1-9-07 to 31-7-09				
	30/11/09 Inc.				Agency Accounts Officer Khyber
	PRINCIPAL:				
	G.C.E.T. (M) Jamrud Khyber Agency,				
	30/11/2000 Inc				
	PRINCIPAL:				
	G.C.E.T. (M) Jamrud Khyber Agency,				
	30/6/2001 Revision of 13pts				
	PRINCIPAL:				
	G.C.E.T. (M) Jamrud Khyber Agency,				
	PRINCIPAL:				
	G.C.E.T. (M) Jamrud Khyber Agency,				
	30/11/2002 Inc				
	PRINCIPAL:				
	G.C.E.T. (M) Jamrud Khyber Agency,				
	30/11/2002 Inc				
	PRINCIPAL:				
	G.C.E.T. (M) Jamrud Khyber Agency,				


1 Name of post	2 Whether the post is of a substantive character or temporary	3 If fluctuating, state the nature of fluctuations, or state whether service continues for persons under Art. 371 C. S. I.	4 Pay in the last part	5 Additional Pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Designation of office of
T.W.O GICETLM) Jomard Khyber Agency Turb. well Brite	Prof 11/10/12		Rs 7790/-	PM		1 ¹² / ₂₀₁₂		GC 7
Do -	-do-		Rs 7960/-	PM	✓	1 ¹² / ₂₀₁₂		GC K 7
Do -	-do-	(House of E. Jomard) Do. Es. are issued from time to time regular of the Provincial Govt. of Punjab from 15/11/13 to 15/11/14.	Rs 8130/-	PM		1 ¹² / ₂₀₁₂		GC 7
Do -	-do-		Rs 8130/-	PM		1 ⁷ / ₂₀₁₄		Govt For-El 7
Do -	-do-		Rs 8300/-	PM		1 ¹² / ₂₀₁₄		GC For-El 7
Do -	-do-		Rs 10735/-	PM		1 ⁷ / ₂₀₁₅		GC 7
Do -	-do-		Rs 10950/-	PM		1 ¹² / ₂₀₁₅		GC For-El 7
Do -	-do-		Rs 13565/-	PM		1 ⁷ / ₂₀₁₆		Govt For-El 7
Do -	-do-		Rs 13840/-	PM		1 ¹² / ₂₀₁₆		GC 7

8(16)

FD No 186 dt 6/4/05

8	9	10	11	12	13	14
Name of Government Servant	Signature of the Head of the Office or other officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (i.e. as per promotion, transfer, dismissal, etc.)	Signature of the Head of the Office or other attesting Officer	Signature and attestation of leave taker	Location of the Government Servant at the date of leave taker's departure from the Government Servant.
	PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency	30/11/2012	A/In	PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency		
	PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency	2/11/2012	A/In	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		Service verified from 20.7.2012 to 20.11.2012 from the Pay Bills and Office record of this College.
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	2/11/2012	A/In	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	2/11/2012	A/In	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		Service verified from 1.12.2012 to 30.11.2012 from the Pay Bills and Office record of this College.
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	2/11/2012	A/In	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30/6/2012	Revision	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		<u>UNDER TAKING.</u> Khyber under taking If any over payment made to me as a result of premature increment the same may be recovered from my pay pension gratuity etc.
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30/6/2012	Revision	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30/6/2012	Revision	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30/6/2012	Revision	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30/6/2012	Revision	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30/6/2012	Revision	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		

1	2	3	4	5	6	7	8	9
Name of post	Whether substan- tive 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 servant	Signature of officer in charge of office at the time of testatio n
T.W.D		14/11/2015	Rs. 11,230/-			12/1/2015		
do.		14/11/2015	Rs. 13,830/-			7/2/2016		
do.		14/11/2015	Rs. 14,200/-			12/2/2016		


PRINCIPAL
 Govt College of Education
 for Elementary Teachers (M)
 Jamrud Cyber Agency

A-177

Signature of the head of the office or other attesting officer in forms 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	Leave		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	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		

LEAVE TAKING
 I have taken leave of 4 days from 17/12/15 to 21/12/15 as payment is made to me as a result of my qualification for leave which will be returned to me by P. S. Pension etc.

[Signature]
 PRINCIPAL
 Govt College of Education
 For Elementary teachers (M)
 Tamrud (Muzer Agency)

No 388 dt 70 $\frac{4}{17}$
 appended 12/15 $\frac{4}{17}$
 dt 1-7-2015 to 31 $\frac{2}{17}$
 dt 6/2/16

[Signature]

To

The Director of Education,
FATA KPK , Peshawar

~~Annex A~~

P-~~18~~-18

Ann-F

Subject: An Application for promotion in scale 7.

RESPECTFULLY SHEWETH:

- 1) That the Petitioner is by birth domiciled of Khyber Agency Peshawar.
- 2) That the petitioner has left the school in primary class due to poverty, and unable to bear the school expenses at primary school Jamroad Khyber Agency.
- 3) He obtained Electrician diploma from Internal chief Industries LTD Hayatabad Peshawar.
- 4) On the basis of such Diploma the Petitioner was appointed on a Post against Class- IV in Scale I.
- 5) That the Petitioner is doing his Job regularly and obediently and no single remarks has been placed against him in his service record.

It is therefore requested that the Petitioner may promoted to Scale 7 as prayed.

مجيب الرحمن
Petitioner

Through Counsel

Azely

Malak Aurang Zeb

Advocate High Court Peshawar

Cell No. 03369199285

Date: October 2018

Azely

P- 19

DETAIL OF ARREAR ON A/C OF REVISION 2016 - 2017 IN RESPECT OF MR.ABDUL WAHID
PUMP OPERATOR P.NO.92643 BPS 07
PHE FATA SUB DIVISION KHYBER AGENCY

Description	Period	Due	Drawn	Difference	Amount
Basic Pay	1 7 2016 to 30 11 2016 (5 Months)	17,380	16,205	1,175	5,875
Basic Pay	1 12 2016 to 30 06 2017 (7 Months)	17,890	16,620	1,270	8,890
Basic Pay	1 7 2017 to 30 11 2017 (5 Months)	21,360	16,620	4,740	23,700
Basic Pay	1 12 2017 to 31 12 2017 (1 Months)	21,970	17,035	4,935	- 4,935
				TOTAL	43,400

~~Abdul Wahid~~

AZEL
TESTED

92643
PHE FATA SUB DIVISION
KHYBER AGENCY

P-20

DETAIL OF ARREAR ON A/C OF REVISION 2016 - 2017 IN RESPECT OF MR. AKBAR
HUSSAIN PUMP OPERATOR P.NO.92654 BPS.07
PHE FATA SUB DIVISION KHYBER AGENCY

Description	Period	Due	Drawn	Difference	Amount
Basic Pay	1.7.2016 to 30.11.2016 (5 Months)	17,380	14,130	3,250	16,250
Basic Pay	1.12.2016 to 30.06.2017 (7 Months)	17,890	14,545	3,345	23,415
Basic Pay	1.7.2017 to 30.11.2017 (5 Months)	21,360	14,545	6,815	34,075
Basic Pay	1.12.2017 to 31.12.2017 (1 Months)	21,970	14,960	7,010	7,010
				TOTAL	80,750

~~Handwritten signature~~

Aziz
ATTACHED

Munir Zeb
District High Court
Peshawar

P(28)

163

L.K-4

Office Order No G-4/32
Dated Pesh: the 4/12/95

Mr. Akbar Hussain S/O. Rokhan Village, Shalman Landi Kotal, Khyber Agency is by offered a post of Pump Operator against the existing vacancy on Water Supply me. Kam Shalman Landi Kotal Khyber Agency. in Basic Pay Scale No. (4) (1560-2230) plus usual allowance as admissible under the rules from time to time on the following terms and conditions with effect from his actual date of arrival for duty.

The Post is purely temporary but likely to continue subject to the availability of sanction from Government.

His service may be terminated at one months notice without any reason being assigned at any time irrespective of the fact that holding a post other than the one to which he was originally recruited or on the payment of one month salary in lieu of notice period.

He will be governed by such rules and orders relating to conduct efficiency and disciplinary leave, travelling allowance, Medical attendance and pay etc. as may be issued by Government from the category of Govt: servants to which he will belong.

He shall not to leave the service unless his resignation is accepted by the competent authority should he desire to resign from service, he may apply for the same with one month notice or alongwith one month pay in lieu of notice period.

He will have to furnish a declaration in writing (i) that he has not already been prescribed from service under the Government or any local body and (ii) that he was dismissed by any other agency.

He will be governed under Public Health Engineering Department Service rules as regard service conditions.

He will be on probation for a initial period of 2-years extendable upto 3-years.

He will have to produce a Medical Certificate of fitness from Medical Superintendent, District Head Quarter at the time of joining duty.

He will be liable to serve any where in N.W.F.P and Federally Admn: Tribal Area.

No TA/DA is allowed for joining the place of posting.

If he accepts the appointment on the terms and conditions specified above, he shall report for duty to the office of the Sub Divisional Officer P.H. Engg: FATA Project Sub-Division... Peshawar with in 15-days of the issue of the offer failing which the offer shall stand cancelled automatically.

EXECUTIVE ENGINEER
PUBLIC HEALTH ENGG: FATA PROJECT
DIVISION PESHAWAR

Att: No. E-9 / 10 / FATA,

/Dated Peshawar the, 4/12/95

Copy forwarded to :-

- The Chief Engineer PHE: Deptt: N.W.F.P, Peshawar.
- The Superintending Engineer PHE: Circle Peshawar.
- The Deputy Accountant General (PR) S/Off: Peshawar.
- The Political Agent, Khyber... for information.
- The SDO PHE: FATA Project Sub-Division... Peshawar.
- The Divisional Accountant Local / The Applicant.

EXECUTIVE ENGINEER
PUBLIC HEALTH ENGG: FATA PROJECT
DIVISION PESHAWAR

0634604

Azhar

Stamp: JUDGE HIGH COURT

P-222) 34

OFFICE OF THE EXECUTIVE ENGINEER P.H. ENGG: FATA PROJECT DIVISION PESHAWAR.

OFFICE ORDER NO. G-4/14
DATED PESHAWAR THE 12.2.88

To
Mr. Imam Sadiq S/O
Ghulam Shah Afridi,
Khyber Agency.

Subject:- ESTABLISHMENT REGULAR OPERATIONAL STAFF.

You are hereby appointed as Pump Operator with effect from 1-1-1988(FN) in Public Health Enng: Department NWFP, Peshawar on AMER W.S. Scheme Khajori in Basic pay scale No.4 @ Rs.675-22-1115 Plus usual allowances admission under the Rules from time to time on the following conditions:

- 1) The Post is purely temporary but likely to be continued.
2. Your services can be terminated at any time without assigning any reason.
3. Should you desire to leave the service, you will have to given one month notice or deposit one month pay in lieu of notice period.
4. You will be governed under Public Health Enng: Department, Services rules as regards service conditions.
5. You will be governed by such rules and orders relating to conducts, efficiency discipline, leave T.A Medical attendance pay etc. as may be issued by Government for the category of post to which will belong.
6. You will liable to serve any where in NWFP.
7. You will have to furnish an declaration in written (i) that you have not already been prescribed from service under the Government or any local body and (ii) that was not dismissed by any other agency.
8. You will be on probation for an initial period of two years extendable upto three years.
9. No. T.A/D.A is allowed for joining the place of duty.
10. The Medical fitness certificate from the Civil Surgeon Peshawar should also be supplied.

If he accept the appointment on the terms and conditions specified above he should report for duty to the SDO PHE FATA Sub-Division Peshawar, within 14-days of the issue of this office order failing which the offer shall stand cancelled automatically.

[Signature]
EXECUTIVE ENGINEER,
PUBLIC HEALTH ENGG: FATA PROJECT,
DIVISION PESHAWAR.

Dated Peshawar the, 13.3/1988.

Endst: No. E-4/2 /FATA,

Copy forwarded to the :-

1. Superintending Engineer PHE Circle, Peshawar.
2. Accountant General NWFP, Peshawar.
3. S.D.O. Public Health Enng: FATA Sub-Division Peshawar for information.
4. Divisional Accountant (Local) for information.

EXECUTIVE ENGINEER,
PUBLIC HEALTH ENGG: FATA PROJECT,
DIVISION PESHAWAR.

G-4

P(23)

OFFICE ORDER NO. G-4/6

DATED PESHAWAR WED 06/12/1987

To,
Mr. Noor-ul-Nabi S/O Ghulam Nabi,
of Charkha Khel Post Office Talania
College Tehsil & District Peshawar.
Subject:-
ESTABLISHMENT REGULAR OPERATIONAL STAFF.

You are hereby appointed as Pump Operator with effect from _____ in Public Health Engg: Department NWFP, Peshawar on AMER W.S. Scheme Khajri in Basic Pay Scale No. 4 @ Rs. 675-22-1115 Plus usual allowances admissible under the Rules from time to time on the following conditions.

- 1) The Post is purely temporary but likely to be continued.
- 2) Your services can be terminated at any time without assigning any reason.
- 3) Should you desire to leave the service, you will have to give one month notice or deposit one month pay in lieu of notice period.
- 4) You will be governed under Public Health Engg: Department, Services rules as regards service conditions.
- 5) You will be governed by such rules and orders relating to conduct, efficiency discipline, leave T.A. Medical attendance pay etc, as may be issued by Government for the category of post to which will belong.
- 6) You will be liable to serve any where in NWFP.
- 7) You will have to furnish an declaration in written (i) that you have not already been prescribed from service under the Government or any local body and (ii) that was not dismissed by any other agency.
- 8) You will be on probation for an initial period of two years extendable upto three years.
- 9) No. T.A./D.A is allowed for joining the place of duty.
- 10) The medical fitness certificate from the Civil Surgeon Peshawar, should also be supplied.

If he accept the appointment on the terms and conditions specified above he should report for duty to the SDO PHE Sub-Division FATA, Peshawar, within 14 days of the issue of this office order failing which the offer shall stand cancelled automatically.

EXECUTIVE ENGINEER
PUBLIC HEALTH ENGG: FATA PROJECT
DIVISION PESHAWAR.
/Dated Peshawar the _____ / 1987.

Endst: No. E-9/_____/FATA

- Copy forwarded to the:-
- 1) The Superintending Engineer, Public Health Engg: Circle Peshawar.
 - 2) Accountant General NWFP, Peshawar.
 - 3) Sub-Divisional Officer, Public Health Engg: FATA Sub-Division Peshawar for information.
 - 4) Divisional Accountant (Local) for information.

EXECUTIVE ENGINEER
PUBLIC HEALTH ENGG: FATA PROJECT
DIVISION PESHAWAR.

[Handwritten signature]

RESPECTFULLY SHEWETH:

- 1) That the Petitioner is by birth domiciled of Khyber Agency Peshawar.
(Annex - A)
- 2) That the petitioner has left the school in primary class due to poverty, and unable to bear the school expenses at primary school Jamroad Khyber Agency.
(Annex - B)
- 3) He obtained Electrician diploma from Internal chief Industries LTD Hayatabad Peshawar.
(Annex - C)
- 4) On the basis of such Diploma the Petitioner was appointed on a Post against Class- IV in Scale I.
(Annex - D)
- 5) That the Petitioner is doing his Job regularly and obediently and no single remarks has been placed against him in his service record.
(Service Book copy Annex - E)
- 6) That the Petitioner has contacted the Respondents and at the last through his council dated 2nd April 2018, but no fruitful result arose.
(Annex - F)
- 7) That his other fellows were given promotion to Scale 7 in C&W department.
(Annex - G)
- 8) That the respondents did not reply and showed silence that is why Petitioner approaches to this Honorable court for his relief.
- 9) That the parties belong to KPK. that is why Court has jurisdiction to entertain it.
- 10) I hope this Court will do justice and will not deny my relief.

It is therefore requested that the Petitioner may promoted to Scale 7 as prayed.

Petitioner ATTESTED

Through Counsel
EXAMINER

Malak Aurang Zeb

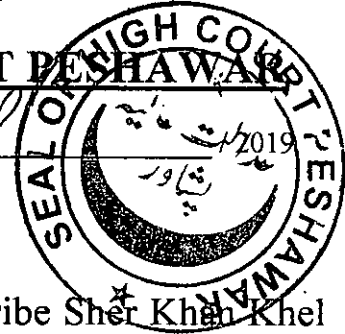
Advocate High Court Peshawar

Cell No. 03369199285

FILED TODAY
Deputy Registrar
16 FEB 2019

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition: No. 1464 78



Mujeeb Ur Rehman S/O Payo Khan R/O Tribe Sher Khan Khel
dagory P.O Tehsil Jamroad District Khyber Agency Peshawar.

Applicant

VERSUS

- 1) The Principal, Govt Elementary College Jamroad Khyber Agency.
- 2) Director of Education FATA KPK , Peshawar.
- 3) Secretary of Education FATA, KPK, Peshawar.
- 4) Deputy Commissioner District Khyber Agency

Respondents

WRIT PETITION U/S 199 OF 1973 CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN , WHEREBY THE PETITION FOR
PROMOTION TO THE NEXT SCALE WAS IGNORED AND NOT
CONSIDERED IT AND KEPT SILENCE, ON REPLY TO THE
APPLICATION GIVEN FOR PROMOTION INSPITE OF WORKING
IN CLASS IV SINCE APPOINTMENT DATED 29-08-1995. to BPS-7

PRAYER:

Without given any opposite and negative remarks mentioned
in Service record, he may be given promotion to grade seven or what is
proper in the eyes of law.

COURT FEE: 500 Rupees

FILED TODAY
Deputy Registrar

16 FEB 2019

ATTESTED

EXAMINER

BEFORE THE PESHAWAR HIGHCOURT PESHAWAR

WP 1464-19/09

Mujeeb Ur Rehman S/O Payo Khan R/O Tribe Sher Khan Khel
dagory P.O Tehsil Jamroad District Khyber Agency.

Applicant

VERSUS

- 1) The Principal, Govt Elementary College Jamroad Khyber Agency.
- 2) Director of Education FATA KPK , Peshawar.
- 3) Secretary of Education FATA, KPK, Peshawar.
- 4) Deputy Commissioner district Khyber Agency.

Respondents

AFFIDAVIT

I, **Fazle rahim S/O Khan Saib** (Special Attorney) R/O haryan Payan P.O Charpriz Peshawar, do here by solemnly affirm and declare on Oath that all the contents of the writ petition are true and correct to the best of my knowledge and belief nothing has been concealed from this Honorable Court.

Deponent

Fazle Rahim S/o Khan Saib

CNIC # 17301-5431712-9

02

Azeem
Identified by : **FILED TODAY**
Deputy Registrar
16 FEB 2019

No:.....	<i>19859</i>
Certified that the above was verified on solemnly affirmation before me in office this..... <i>8th</i>	
day of... <i>Feb</i>	at... <i>Dist. Peshawar</i>
s/o... <i>Khan Saib</i>	who was identified by... <i>Deputy Registrar</i>
Who is personally known to me: <i>Deputy Registrar</i>	
 Oath Commissioner Peshawar High Court, Peshawar	

MALIK AURANGZEB KHAN

Advocate High Court Peshawar

0336-9199285

ATTESTED

EXAMINER

28

BEFORE THE PESHAWAR HIGHCOURT PESHAWAR

ADDRESSES OF THE PARTIES

WP 1464/19

Mujeeb Ur Rehman S/O Payo Khan R/O Tribe Sher Khan Khel
dagory P.O Tehsil Jamroad Khyber Agency Peshawar.

Applicant

VERSUS

- 1) The Principal, Govt Elementary College Jamroad Khyber Agency.
- 2) Director of Education FATA KPK , Peshawar.
- 3) Secretary of Education FATA, KPK, Peshawar.
- 4) Deputy Commissioner District Khyber Agency Peshawar.

Respondents

Appellant Through Council

**Malak Aurang Zeb
High Court Peshawar
Cell No. 03369199285**

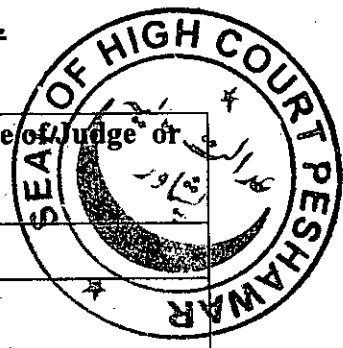
**FILED TODAY
Deputy Registrar
16 FEB 2019**

CERTIFIED TO BE TRUE COPY
Peshawar High Court, Peshawar
Authorised under Article 87 of
the Constitution of Pakistan Order 1984
14 NOV 2019

P - 29

PESHAWAR HIGH COURT, PESHAWAR.

ORDER SHEET



Date of Order or Proceedings	Order or others Proceedings with Signature of Judge or counsel where necessary
1	2
24.10.2019	<p>W.P No. 1464-P/2019.</p> <p>Present: Malik Aurangzeb Khan, Advocate, for the petitioner.</p> <p>Syed Qaiser Ali Shah, AAG for the respondents.</p> <p>*****</p> <p>LAL JAN KHATTAK, J. The former, at the very outset, stated at the bar that he would not press the instant writ petition, if the petitioner is allowed to approach the proper forum for redressal of his grievance.</p> <p>2. In view of the above, the instant writ petition is dismissed for its being not pressed, however, the petitioner would be at liberty to approach the proper forum for the remedy available to him under the law.</p> <p>Announced. 24.10.2019.</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p>

No. 13257

Date of Presentation of Application 13/10/19

No of Pages 5

Copying fee 20

Total 20

Date of Preparation of Copy 13/10/19

Date of Delivery of copy 13/10/19

Received By [Signature]

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorised Under Article 87 of
the Constitution of Pakistan Order 1982

14 NOV 2019

قیمت
50 روپے

34842



ایڈوکیٹ: اورنگزیب اینڈ علی خان ایڈووکیٹس

بار کونسل ایسوسی ایشن نمبر: 1306 - 7614 - BC 17

رابطہ نمبر: 0334-9174920 / 0336 9199285

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: حیرمین سروس ٹریننگل پشاور

منجانب: ایپلانٹ	دعوی:
مجیب الرحمن	علت نمبر:
بنام	مورخہ:
پینل ایلمنٹری کالج پشاور	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام پشاور کیلئے اورنگزیب ایڈووکیٹ / علی خان ایڈووکیٹس کو کیل مقرر

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

Attested and verified by orangezeb Advocate High Court Peshawar 26-11-2019

المقام: پشاور
Ali Khan Advocate

BEFORE THE COURT OF CHAIRMAN SERVICE TRIBUNAL KP
PESHAWAR

Appeal No.1712/2019

Mujeeb ur Rahman S/o Payo Khan R/O District Khyber.

..... (Petitioner)

VERSUS

Govt: of Khyber Pakhtunkhwa and others.

Affidavit

I Muhammad Ullah Education Instructor Govt, College for Elementary Teachers Male Jamrud District Khyber, do hereby solemnly affirm and declare that the contents of the accompanying para wise comments submitted by the respondent No. 1-4 are correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.


Deposent.

Identified by

Advocate General,
Service Tribunal K. P
Peshawar

BEFORE THE COURT OF CHAIRMAN SERVICE TRIBUNAL

PESHAWAR

Appeal No.1712/2019

Mujeeb ur Rahman S/o Payo Khan R/O District Khyber.

..... **(Petitioner)**

VERSUS

1. The Principal Govt, College for Elementary Teacher Male Jamrud.
2. Director Education (FATA) KPK Peshawar.
3. Secretary Education KPK Peshawar.
4. Deputy Commissioner Khyber. **(Respondents)**

Comments on behalf of Respondents No.1

Respectfully sheweth;

Preliminary objections

- That the Petitioner has got no cause of action, locus standi to file the instant Petition.
- That the Petitioner has not come to this Court with clean hands.
- That the petitioner has concealed material facts from the Honorable court.
- That the conduct of petitioner estopped himself to bring the instant petition.
- That instant petition is not maintainable in the present form hence liable to be dismissed.

On Grounds

1. Correct.
2. No comments.
3. Incorrect, hence denied. The International Ghee Industries Ltd is neither a Government Institution nor recognized/ registered by Government to issue any Technical Degree/certificate. The petitioner is not an Electrical Diploma holder but produced a Service Certificate titled "To whom it may Concerned" from international Ghee Industries LTD at the time of his first appointment. **(Copy of the Service Certificate is attached as annexure A)**



4. Incorrect. The petitioner was not appointed on the basis of Electrical diploma as the petitioner is not a diploma holder from any Government recognized Institution and no entry has been made in his Service Book up till now. **(Copy of the Service Book is attached as annexure, B)**
5. No comments subject to record.
6. Incorrect. Hence denied.
7. Incorrect. The petitioner was appointed in Education Department against the newly created post of Tube well operator BPS 01 on temporary basis on 29/07/1995. Subsequently the post has been upgraded to BS 02 in 2007 and BS-4 in Two Steps Up-gradation in 2015 as per Government Notification No. KC/FD/SO(FR)/7-20/2015 dated: 17-08-2015. **(Copies of the appoint: order & Notifications are attached as annexure C,D&E)**

The petitioner has enjoyed the benefits of up-gradation and now placed in BPS.04 under the rules in vogue.

The Education Department has neither given promotion to any Tube well operator to BPS 07, nor has the post been upgraded by the Finance Department Government of Khyber Pakhtunkhwa. The petitioner is the employee of Education Department while C&W is a separate Department, having different service rules and promotion policy.
8. Incorrect. Hence denied.
9. No comments.
10. The petitioner filed a writ petition in the Honourable Peshawar High Court under W.P. No.1464/2019 which was dismissed by the Honourable Court on 24/10/2019. **(Copy attached as annexure F)**
11. No comments.

Pray:

In light of the above stated facts, it is humbly requested that the case of the petitioner may be dismissed.

AV

Respondent. 1.



**Principal
GCET (M) Jamrud
District Khyber**

Respondent. 2.



**Director E&SE
Khyber Pakhtunkhwa Peshawar**

Respondent. 3.



**Secretary E&SE
Khyber Pakhtunkhwa Peshawar**

Respondent. 4.



**Deputy Commissioner
District Khyber**

Ann - C
(7)

Our Ref. No. _____

Date 16.7.95

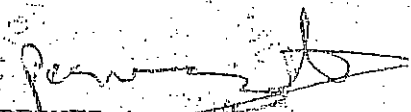
TO WHOM IT MAY CONCERN

Certified that Mr. Mujeebur Rehman S/O Paya Jan is working in this Organisation as Electrician/Pump Operator since 7.10.1992.

During this period he is found punctual, honest and hard worker.

We wish him a bright future.

D ted 16.7.95


(PERVEZ AKHTER)
PROJECT MANAGER

L No = 17

P No 173

PH 004/13

SERVICE BOOK

OF

Mr. Mujeeb-ur-Rehman
Tube Well Operator

N.I.C. No 21202-6832499-5

Price : Rs. 10.00

11/15 212 2001 6832499-1

(For use in Police Department only).

Heirs,

- 1.
- 2.
- 3.

Verification Roll No. dated received back

Left thumb-impression.

Qualification	Date	Qualifications	Date
English		First Arts	
Poethia		B. I. or B. A.	
Uchi		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications—	
Drill instructing			
Court duties			
Reserve duties			

N.B.—Line to be drawn under the qualification possessed.

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

1. Name .. Mr Mijeebur Rehman.

2. Race .. Kuki Khel Afiradi

3. Residence

Village Malak Abad Jamrud Tehsil
Jamrud (Mhyber)

4. Father's name and residence

Mr Pajo Jan.

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

03-03-1971

6. Exact height by measurement

5 - 6

7. Personal marks for identification

Linear Scars on ventral surface

8. Left hand thumb and Finger impres-
sion of (non-gazetted) officer

LT. F. Arim.

Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb.



9. Signature of Government servant

حبيب الرحمن

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

PRINCIPAL

Govt. College of Education
for Elementary Teachers
(FATA) Jamrud Khair Agency

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 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 servant
Mujeeb-ur-Rehman	Plumber	BPS No (1345-35-1770)					
tube-well operator	"		Rs 1245/-pm	-	-	29/7/95	مجيب الرحمن
Elementary	"		Rs 1280/-pm	-	-	1/12/96	مجيب الرحمن
College Jamrud	"		Rs 1315/-pm	-	-	1/12/97	مجيب الرحمن
(Khyber Agency)	"		-	-	-	-	مجيب الرحمن
do	"		-	-	-	-	-
do	"		Rs 1350/-	-	-	1/12/98	-
do	"		Rs 1385/-pm	-	-	1/12/99	مجيب الرحمن
do	"		Rs 1420/-pm	-	-	1/8/00	مجيب الرحمن
do	"		Rs 1455/-pm	-	-	1/12/2001	مجيب الرحمن
do	"		-	-	-	-	-
do	"		-	-	-	-	-
do	"		-	-	-	-	-
do	"		-	-	-	-	-
do	"		Rs 2200/-pm	-	-	1/12/2001	مجيب الرحمن
do	"		Rs 2255/-pm	-	-	1/12/2002	مجيب الرحمن

Revised Basic Pay Scale No I
(1870-55-3520)

Signature and
Name of the
officer
Station of
...

Print
G.B.C.

ture of
ment
vant

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Nature and condition of the head office or other posting officer in station of posts 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Period	Government to which debitable	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 Service
Principal G.B.C. Jamrud	30/11/96	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/97	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/98	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/99	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/2000	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/2001	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/2002	A. Int.	[Signature]				
Principal G.B.C. Jamrud	30/11/2003	A. Int.	[Signature]				

Appointed against newly created Post of Tube-well operator w. e. from 29-7-1995 till this office order No 13 dated 29-7-1995 (F.N)

Govt. Order for E. Punjab (FAT.A) Jammu & Kashmir

29-7-95

Govt. Order

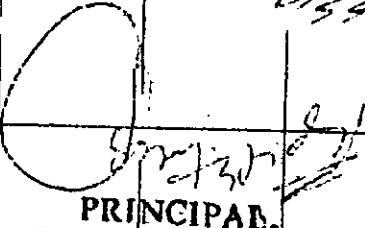
8-10-97

Service verified from 1-1-98 to 30-11-98 from the Pay Bills and records.

Service verified from 1-12-98 to 31-10-99 from the Pay Bills and Office record of this station.

[Signature]
Principal
G.B.C. Jamrud
Jammu & Kashmir

1	2	3	4	5	6	7	8	9
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 Art. 37 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government	Signature and designation of the officiating officer at the station in column 1 to
Mujibur Rehman	Substantive / Official		Rs 2310/-			1 ¹² / ₂₀₀₃	محمد طارق الرحمن	
Do -	Do -		Rs 2365/- PM			1 ¹² / ₂₀₀₄	محمد طارق الرحمن	
Revision of pay on 1/7/2005 BPS 1 (2150-65-4100)								
Do -	Do -		Rs = 2735/- PM			1 ⁶ / ₂₀₀₅	محمد طارق الرحمن	
Do -	Do -		Rs = 2800/- PM			1 ¹² / ₂₀₀₅	محمد طارق الرحمن	
Do -	Do -		Rs 2865/- PM			1 ¹² / ₂₀₀₆	محمد طارق الرحمن	
Pay and Scale Revision BPS-1 to BPS-2 (2535-85-5080)								
Do -	Do -		Rs 3375/- Rs 3380/- PM			1 ⁷ / ₀₇	محمد طارق الرحمن	
BPS No 1 to BPS No 2 (2535-85-5080)								
Do -	Do -		Rs 3450/- PM Rs 3465/- PM			1 ¹² / ₂₀₀₇ 2 ¹² / ₀₇	محمد طارق الرحمن	

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government
G.C.E.T. (M) Jamrud Sub: oprit	Per (Temp)	Pay Revised BPS-2 (3035-100-5080)					[Signature]
- do -	- do -		Rs 4135/- PM			12/2008	[Signature]
Do	do			Rs 4235/- PM		12/08	[Signature]
<p>Revised entries due to special movement of 1-9-07 vide DE (D.P.A) W.F. Retention order No 4836-90 dt 5/8/09</p>							
				Rs 3320+85 = 3405/-		9/07	
				Rs 3550/-		12/07	[Signature]
		(3035-100-5085)		Rs 4235/-		7/08	[Signature]
				Rs 4235/-		12/08	[Signature]
 PRINCIPAL, G.C.E.T. (M) Jamrud Khyber Agency.							
47	do			Rs 4435/- PM		12/09	[Signature]
				Rs 4535/- PM		12/2010	[Signature]
- Do -	- do -	BPS No-02 (190-170-15000)		Rs 7450/- PM		12/2011	[Signature]
- Do -	- do -			Rs 7630/- PM		12/2011	[Signature]

E. P. P. Adhikari

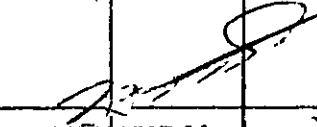
OPTION

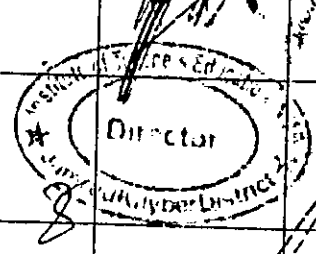
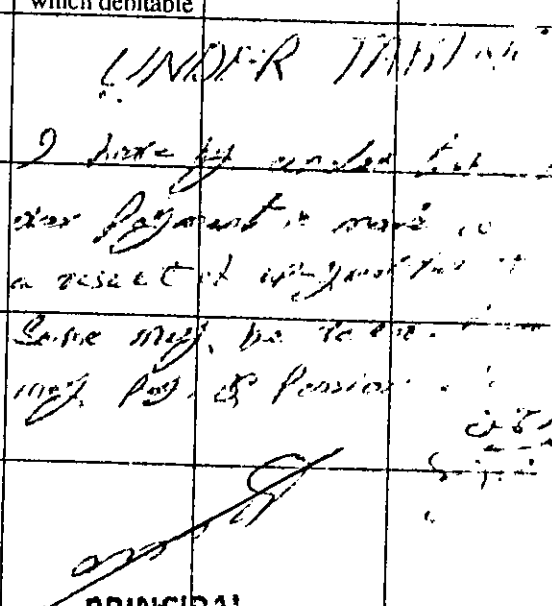
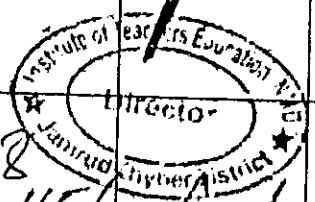
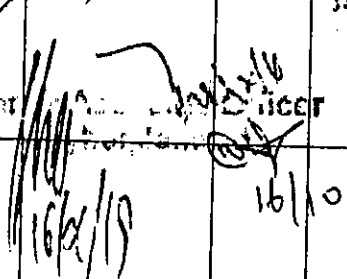

Signature of the head of the office or other attesting officer in a restriction columns 1 to 8	Date of termination of appointment	Person of certification (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Name of the office of leave taken	A location of period of leave on average of up to four months for which the salary is payable to another Government	Reference to any recorded punishment or censure, or award of praise of the Government Servant
<i>[Signature]</i>	30/08	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	T. No 175... T.W.R. 86 Signature of the head of the office or other attesting officer Agency Accounts Officer <i>[Signature]</i>
<i>[Signature]</i>	30/08	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	Service verified from 1-1-07 to 30-6-08 on office record. <i>[Signature]</i>
<i>[Signature]</i>	30/08	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	Services verified up to 30-6-2008 on office record. <i>[Signature]</i>
<i>[Signature]</i>	30/09	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	T-89 17/8 <i>[Signature]</i>
<i>[Signature]</i>	30/11	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	Drawn order of Spl Income 15-2150/w.e.r. 1-9-07 to 31-7-09 <i>[Signature]</i>
<i>[Signature]</i>	30/11	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	Agency Accounts Officer Khyber <i>[Signature]</i>
<i>[Signature]</i>	30/11	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	PRINCIPAL G.C.E.T. (M) Jamrud Khyber Agency, <i>[Signature]</i>
<i>[Signature]</i>	30/11	<i>[Signature]</i>	<i>[Signature]</i>	Principal	Government to which debitable	PRINCIPAL G.C.E.T. (M) Jamrud Khyber Agency, <i>[Signature]</i>

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant Designation of the head of the office or other officer in attestation of columns
T.W.O District (M) Jammu Whistle Blower Sub. with 1/12	Perf 11/10/12		Rs 7790/-	P.M.		1-12-2012	[Signature] G.C.E.A Khyber
Do	- do -		Rs 7960/-	P.M.	✓	1-12-2012	[Signature] G.C.E.A Khyber
Do	- do -		/	/			/
Do	- do -	(Revised Entries) Due to one premature incj to the regular of the Provincial Govt employees from 13/05/10 to 13/05/14 w.e.f 1-7-2014.	Rs 8130/-	P.M.		1-12-2012	[Signature] Govt Coll Jammu
Do	- do -		Rs 8130/-	P.M.		1-7-2014	[Signature] Govt Coll Jammu
Do	- do -						
Do	- do -		Rs 8300/-	P.M.		1-12-2012	[Signature] Govt Coll or Elements Jammu
Do	- do -		Rs 10735/-	P.M.		1-7-2015	[Signature] Govt Coll Jammu
Do	- do -		Rs 10950/-	P.M.		1-12-2011	[Signature] Govt Coll For El Jammu
Do	- do -		Rs 13565/-	P.M.		1-7-2016	[Signature] Govt Coll For El Jammu
Do	- do -		Rs 13840/-	P.M.		1-12-2016	[Signature] Govt Coll For El Jammu

DR No 186 dt 6/4/10

8.	9.	10.	11.	12.	13.	
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 of leave on average pay upto four months to which leave salary is debitable to another Government Period to which debitable	Signature of the head of the office or other attesting officer Retention money recorded from the pay bills and Office record of the Government Servant.
	PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency		
	PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		Service verified form 2.2.2008 to 29.11.2013 from the Pay Bills and Office record of this College
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		PRINCIPAL G.C.E.T (M) Jamrud Khyber Agency
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		Service verified form 1.12.2012 to 30.11.2013 from the Pay Bills and Office record of this College
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	Revision 2013	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		UNDER TAKING of any over payment made me as a result of the increase in the same may be removed from any pay drawings etc.
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	Revision 2013	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency
	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency	30-11-2013	A/Inc	PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency		PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency

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 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 servant
M.A.		Revised Pay scale to officiating					
M.A.		w.e.f 1-7-2015 u.r DE /ATA Peshawar Empl. No. 6647-60 dated 16/3/2017 BPS No. 04 (6730-300-15730)	Rs. 11230/-			12/2015	محمد الرحمن مجیب
M.A.		BPS No. 04 (8330-370-13350)	Rs. 13830/-			7/2016	محمد الرحمن مجیب
M.A.			Rs. 14200/-			12/2016	محمد الرحمن مجیب
				 PRINCIPAL Govt College of Education for Elementary Teachers (M) Jamrud Cyber Agency			
		Revised 2017 in BPS 04	9400	-4400	-23100)		
M.A.			Rs. 16940/-	-PM		9/2017	محمد الرحمن مجیب
M.A.			Rs. 17380/-	-PM		9/2017	محمد الرحمن مجیب
M.A.			Rs. 17820/-	-PM		9/2018	محمد الرحمن مجیب

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Period	Government to which debitable	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
	Service rendered from 1-12-2018 to 30-11-2017 from the P.O. and Office on record of his Justice						
							
						<p>PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency</p>	
	30 th 11/2019 A/m.e						
	TR 1156 Dated						
	15 th 10/2019 - Rs-22178/-						
	Premerature incident						
	W.F-7 th 7/2015 to						
	30-9-2019.						
			Agmt				
							
						<p>PRINCIPAL Govt College of Education For Elementary Teachers (M) Jamrud Khyber Agency</p>	

OFFICE OF THE PRINCIPAL GOVT: ELEMENTARY COLLEGE JAMRUD (KHYBER AGENCY):

APPOINTMENT.

Office order NO 13

Dated Jamrud the 29.7.1995.

Reference Political Agent Khyber Agency Endst NO 5085 dated 25.7.1995 Mr. Mujeebur Rehman S/O Payo Jan Kuki Khel Sher Khan Khel of Jamrud is hereby appointed against the newly created Post of Tube-Well Operator B.P.S.NO I 1-e(1245-35-1770) plus usual allowances as admissible under the rules w.e.from 29.7.1995 or the date of taking over charge of his duty.

Note:- The appointment of the above named candidate is purely on temporary basis and is liable to termination at any ^{time} without notice and without assigning any reason, in case he wishes to resign at any time he will have to submit one month's pay prior notice or will have to forfeit one months pay to the Govt; in Lieu thereof.

2:- He is required to produce his health and age Certificate from the civil Surgeon concerned and no pay will be drawn to him until he produce the same.

3:- Good conduct certificate on affidavit from D/O D.S.P. concerned.

Mari
PRINCIPAL,
Govt: Elementary College(M),
Jamrud (Khyber Agency):

Endst: NO: 3040 / Dated GEC Jamrud the 29/7 / 1995.

Copy forwarded to the:-

- 1:- Director of Education (FATA) NWFP Peshawar for information please.
- 2:- Agency Account's officer Khyber Agency at Peshawar.
- 3:- ~~Official concerned~~ P.A. Khyber for information.
- 4:- Official concerned.

- 50 -
PRINCIPAL,
Govt: Elementary College(M),
Jamrud (Khyber Agency):



GOVERNMENT OF PAKISTAN
FINANCE DIVISION
(Regulations Wing)

No. F.6(4)R.1/2006.

Islamabad, the 29th June, 2007.

OFFICE MEMORANDUM

Subject: UPGRADATION OF CLERICAL/AUDITORS POSTS.

The President has been pleased to approve the up-gradation of the following clerical / auditors posts as detailed below w.e.f. 01-07-2007:-


SER. NO.	NAME OF THE POST	Existing BPS	Up-graded BPS
1.	Lower Division Clerk (LDC/Junior Clerk)	BPS-5	BPS-7
2.	Senior Auditor	BPS-5	BPS-7
3.	Upper Division Clerk (UDC/Senior Clerk)	BPS-7	BPS-9
4.	Assistant/Head Clerk	BPS-11	BPS-14
5.	Senior Auditor	BPS-11	BPS-14

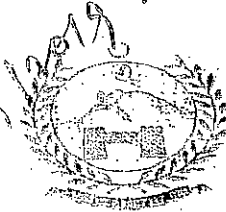
The incumbents of the up-graded posts will also stand upgraded and their pay will be fixed at the stage next above their basic pay in their lower pay scales.

2. The President has also been pleased to approve that employees from BPS 1 to 4 would move one scale up in the pay scales w.e.f. 1st July, 2007.

3. The Establishment Division will amend the recruitment rules of the ministerial posts, whereas amendments in the recruitment rules of other posts listed at Para 1 above shall be made by the concerned Ministries / Divisions / Departments in consultation with the Establishment Division.

4. As a special dispensation, the annual increment falling due on 1st December, 2007 shall be admissible to the above mentioned employees in the upgraded pay scales.


(S. M. Usman)
Deputy Secretary (R.I.)
29/6/07
22 9262704



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)
NO. KC/FD/SO(FR)/7-20/2015
Dated Peshawar, the 17-08-2015

To,

The all Administrative Secretaries
Govt of Khyber Pakhtunkhwa,

Subject: CLARIFICATION ON BENEFICIARIES OF PARA-1 OF THE NOTIFICATION DATED 30-06-2015 TO ALL EMPLOYEES FROM BS-01 TO BS-16 IN THE KHYBER PAKHTUNKHWA GOVERNMENT.

Dear Sir,

I am directed to refer to this department notification bearing No. KC/FD/SO(FR)/7-20/2015 dated 30-06-2015 and to state that a question has been arisen about beneficiaries of para-1 of notification ibid. It is clarified that -

- i. Two pay scales upgradation will be allowed to all provincial government employees from BS-01 to BS-05 and One pay scale upgradation from BS-06 to BS-15 will be allowed to those employees who have been appointed under Khyber Pakhtunkhwa Civil Servants Act 1973.
- ii. One pre-mature increment will be allowed to all the upgraded employees defined in Finance Department letter No. SO(PRC)/1-21/77 dated 30-05-2014.
- iii. Fresh appointment including Technical and Non Technical staff will be made in new pay scale instead of existing pay scale as already mentioned in para-1(a) of this department notification bearing No. SO(FR)/FD/7-20/2015 dated 30-06-2015.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

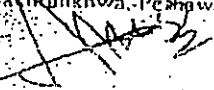
Encl. No. & Date even.

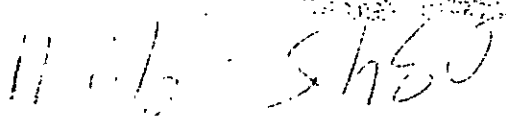
Copy of the above is forwarded for information and necessary action to the:-

1. PS to Additional Chief Secretary, FATA.
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khy Pakhtunkhwa.

Diary Branch
for w/a (P)
Supdt B
Govt
24/8
BN

11. Chairman, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
12. Registrar, Service Tribunal Khyber Pakhtunkhwa.
13. Secretary to Govt. of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi and Quetta.
14. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan.
15. The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Manshera and Dir Lower.
16. The Treasury Officer, Peshawar.
17. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
18. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
19. PSO to Chief Secretary, Khyber Pakhtunkhwa.
20. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
21. PS to Finance Secretary.
22. PAs to All Additional Secretaries/Deputy Secretaries in Finance Department.
23. All Section Officers/Budget Officers in Finance Department.
24. Mr. Jabir Hussain Bangash, President, Class-IV Association, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
25. Mr. Manzoor Khan, President, Civil Secretariat Driver Association Khyber Pakhtunkhwa, Peshawar.
26. Mr. Akbar Khan Mohmand, Provincial President, Class-IV Association, Khyber Pakhtunkhwa, Peshawar.


 (MURAD AHMAD)
 SECTION OFFICER (FR)
 0919212635


 Malik Shahid

(1)

BEFORE THE PESHAWAR HIGHCOURT PESHAWAR

Writ Petition No. 1464 / 2019

**Mujeeb Ur Rehman S/O Payo Khan R/O Tribe Sher Khan Khel
dagory P.O Tehsil Jamroad District Khyber Agency Peshawar.**

VERSUS



- 1) The Principal, Govt Elementary College Jamroad Khyber Agency.
- 2) Director of Education FATA KPK , Peshawar.
- 3) Secretary of Education FATA, KPK, Peshawar.
- 4) Deputy Commissioner District Khyber Agency

Respondents

WRIT PETITION U/S 199 OF 1973 CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN , WHEREBY THE PETITION FOR
PROMOTION TO THE NEXT SCALE WAS IGNORED AND NOT
CONSIDERED IT AND KEPT SILENCE, ON REPLY TO THE
APPLICATION GIVEN FOR PROMOTION INSPITE OF WORKING
IN CLASS IV SINCE APPOINTMENT DATED 29-08-1995. to BPS-7.

PRAYER:

Without given any opposite and negative remarks mentioned
in Service record, he may be given promotion to grade seven or what is
proper in the eyes of law.



COURT FEE: 500 Rupees

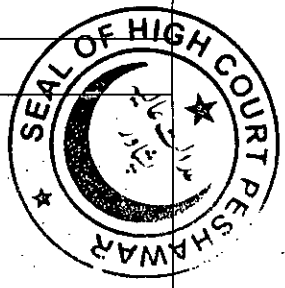
FILED TODAY
Deputy Registrar
16 FEB 2019
ATTESTED
EXAMINER
Peshawar High Court

WP1464-2019: Mujeeb Ur Rehman Vs Secy Education Full PG 40

PESHAWAR HIGH COURT, PESHAWAR.

ORDER SHEET

Date of Order or Proceedings	Order or others Proceedings with Signature of Judge or counsel where necessary
1	2
<p>24.10.2019</p>	<p align="center"><u>W.P No. 1464-P/2019.</u></p> <p>Present: Malik Aurangzeb Khan, Advocate, for the petitioner.</p> <p>Syed Qaiser Ali Shah, AAG for the respondents.</p> <p align="center">*****</p> <p><u>LAL JAN KHATTAK, J.</u> The former, at the very outset, stated at the bar that he would not press the instant writ petition, if the petitioner is allowed to approach the proper forum for redressal of his grievance.</p> <p>2. In view of the above, the instant writ petition is dismissed for its being not pressed, however, the petitioner would be at liberty to approach the proper forum for the remedy available to him under the law.</p> <p><u>Announced.</u> 24.10.2019.</p> <div style="text-align: right;">  JUDGE </div> <div style="text-align: right;">  JUDGE </div>
<p>No. <u>5011</u></p> <p>Date of Presentation of Application <u>19/10/2019</u></p> <p>No of Pages <u>2</u></p> <p>Copying fee <u>5</u></p> <p>Total <u>2078/1000</u></p> <p>Date of Preparation of Copy <u>20/10/2019</u></p> <p>Date of Delivery of Copy <u>20/10/2019</u></p> <p>Received By <u>[Signature]</u></p>	<p align="right"> CERTIFIED TO BE TRUE COPY <small>EXAMINER Peshawar High Court, Peshawar Authorized Under Article 87 of the Constitution of Pakistan Order 1984</small> 20 AUG 2020 </p>



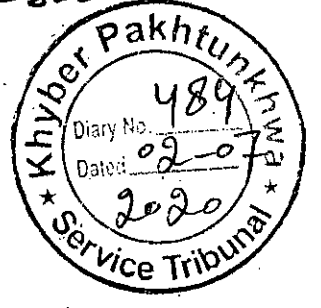
The period for requisite deposit is extended for 3 days from today.

27/7/20

In the Court of Chairman Service Tribunal Peshawar

Recd up from
and along
copy of
for
27/7/20

MuJeb us Rehman
Vs



Director Education FATA etc.

That the case mentioned above
No 1712/2019 has been admitted
and the petitioner may be allowed
to deposit the security fees.

Recd

Respectfully sheweth:

- 1) That the above titled case is fixed for 22/7/2020.
- 2) That the case was admitted however due to coronavirus and other non-suitable conditions like death of wife the petitioner could not deposited the security fees.

(3) That it is your discretion
power to allow / given
permission to deposit to court
security fees.

It is therefore requested that
the permission may kindly be
given.

Yours
Musab ur Rehman

Through counsel
Aurangzeb Akbar

Date
2/7/2020

سروس ٹریڈیونگ ایسوسی ایشن

محبت الحسنیٰ منجانب
محمد الہمن مسکنہ

موردہ
مقدمہ
دعویٰ
جرم

باعث تحریر آٹکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کارروائی متعلقہ

آن مقام **انور** کیلئے **شہور علی خان خان** مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و اقرار ثالث و فیصلہ پر حلف دینے جو اب رہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ راضی دعویٰ اور درخواست ہر قسم کی تصدیق و زرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا بطریقہ یا اپیل کی برآمدگی اور منسوخی نیز واپس کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا اور ان مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سب سے وہ ہوگا۔ کوئی تاثر پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ یہ دعویٰ مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted
[Signature]

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المرقوم

محمد الحسن

کے لئے منظور ہے۔