

1

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

**12(2) CPC PETITION NO. \_\_\_\_\_**

**IN S.A NO. 1011/2012**

1. Chief Secretary, Khyber Pakhtunkhwa.
2. Secretary, Administration Department .....Petitioners

**VERSUS**

1. Mr. Khan Bahadur, Driver, Higher Education Department.
2. Secretary, Higher Education Department.....Respondents

**Index**

<b>Sr. No.</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	12(2) Petition		2-3
2.	Affidavit		4
3	First Appointment order of the Respondent	A	5
4	Second Appointment order in GGC Hayatabad & Termination Order	B	6-7
5	Service Tribunal Judgment dated 31-05-2022	C	8-13
6	Service Book	D	14-27

2

**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

**12(2) CPC PETITION NO.**

Secretary, Administration Department.....(Petitioner)

Versus

1. Mr. Khan Bahadar, Driver, Higher Education Department.

2. Secretary Higher Education Department.....(Respondents)

---

**Application under Section 12(2), of Civil Procedure Code 1906, for setting aside the judgment/order dated 31-05-2022 obtained by Respondent No. 1 on the basis of fraud, mis-representation and concealment of facts from the Hon'ble Service Tribunal Peshawar in Service Appeal No. 1011/2012**

---

**RESPECTFULLY SHEWETH:**

The Petitioner presents their grievance as under:-

- A. That since bifurcation of E&A Department in 2001, the posts of Driver, being centralized cadre posts, on the basis of relevant function enumerated under E&A Department in Schedule-II of the Rules of Business, 1985, is filled by initial recruitment through Departmental Selection Committee under the Chairmanship of Secretary Administration.
- B. That Respondent No. 01 was appointed as Driver (BS-04) by the Respondent No. 02 (Higher Education Department) (**Annex-A**) for which Respondent No.02 was not competent to appoint a Driver at the strength of Administration Department.
- C. Hence, Respondent No. 02 (Higher Education Department) in compliance of directions of Administration Department, terminated Respondent No. 01 on 16-08-2012 being not appointed according to the rules/regulation.
- D. Thus the appointment order of the Respondent No. 01 (Mr. Khan Bahadar, Driver) was issued by incompetent Authority and it was void ab-initio hence, under the law, no vested right accrued to the petitioner as a result of appointment passed by incompetent authority.
- E. That the Respondent No.1 (Mr. Khan Bahadar, Driver) was re-appointed as Driver in Govt. Girls College Hayatabad Peshawar on 04-12-2012 after his termination on 16-08-2012 by Respondent No.02 (Higher Education Department) (**Annex-B**).
- F. That Respondent No.1 (Mr. Khan Bahadar, Driver) had filed an appeal prior to his re-appointment on 14-09-2012 in the Khyber Pakhtunkhwa Services Tribunal.
- G. That the Hon'ble Service Tribunal vide judgment dated 31-05-2022 (**Annex-C**) allowed the appeal and directed the Respondent No.02 (Higher Education

Department) to re-instate the Respondent No. 01 (Mr. Khan Bahadar, Driver) in service with effect from 16-08-2012 with all back benefits.

- H. That Respondent No. 01 (Mr. Khan Bahadar, Driver) got judgment in his favor on the basis of fraud and concealment of material facts from the Hon'ble Service Tribunal.
- I. That during the claimed period for re-instatement into service, he remained employed in Govt. Girls Degree College Hayatabad and received regular salaries and other benefits for the said period up-to date which is clear from his Service Book (Annex-D) which is a proof of his being in-service till date.
- J. That the Respondent No. 01 deliberately concealed the actual fact from this Hon'ble Tribunal that the Respondent No.01 (Mr. Khan Bahadar, Driver) was re-appointed and is still in-service drawing salaries and other benefits from Higher Education Department for the period which is mentioned in ibid Judgment of the Hon'ble Service Tribunal.
- K. That the Petitioner (Secretary Administration) was not heard properly to explain the real position of the Respondent No.01 that he is still in-service and his plea for re-instatement into service alongwith all back benefits is infructuous and baseless rather misleading, fraudulent and illegal void ab-initio.
- L. That if the Respondent No. 1 is re-instated into service in pursuance of the Judgment of Service Tribunal, it would mean double appointment/employment of the of the Respondent No. 1 under the same Govt. i.e. Government of Khyber Pakhtunkhwa.
- M. That if the judgment of Service Tribunal is implemented and the Respondent No. 1 receives all back benefits, it would mean double remuneration/salaries for Respondent No. 1 for the same period of time.
- N. Thus the order arrived at by the Hon'ble Tribunal merits dismissal and subsequent release of the salary of the Petitioner (Secretary Administration) which was attached on 06-02-2023.

**Prayer:-**

**In view of the above facts, it is, therefore, most respectfully requested that while allowing this petition, the Judgment dated 31-05-2022 may be set aside on the basis of concealment of facts from the Hon'ble Tribunal with heavy cost.**

03.03.23

**Secretary,  
Administration Department.  
(Petitioner)**

4

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

**12(2) CPC PETITION NO.**

**IN S.A NO. 1011/2012**

1. Chief Secretary, Khyber Pakhtunkhwa.
2. Secretary, Administration Department .....Petitioners

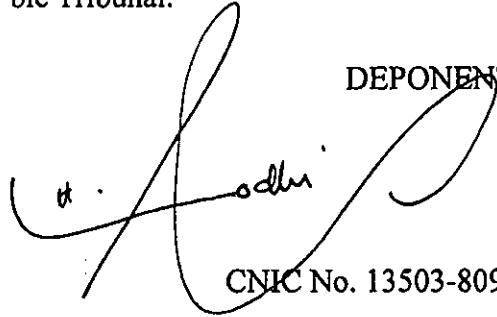
**VERSUS**

1. Mr. Khan Bahadur, Driver, Higher Education Department.
2. Secretary, Higher Education Department.....Respondents

**AFFIDAVIT**

I, Majid Hannan Lodhi, Section Officer (Litigation) BPS-17, Judicial Wing, Establishment Department, Govt. of Khyber Pakhtunkhwa do hereby solemnly declare that contents of the reply to Show-Cause are correct to the best of my knowledge and record and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



CNIC No. 13503-8092069-1

Contact No. 0333-6253335



A Annexure - A 17 05  
**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT**

Dated Peshawar the 1<sup>st</sup> October, 2011

**ORDER:-**

**NO.SOG/HE/PF/Khan Bahadar/2011.** Under rule 10 sub rule-2 of the N-WFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, read with amendment made vide notification No. SOR.VI(E&AD)1-13/2005 dated 10-03-2005, Mr. Khan Bahadar S/O Wazir Khan R/O Village Gul Khan P.O. Shodag, District Charsadda is hereby appointed as Driver (BS-04) (5200-230-12100) against an existing vacancy in Higher Education Department w.e.f 01-10-2011 on the following terms & conditions.

- i. He will get pay at the minimum of BS-04 including usual allowances as admissible under the rules. He will be entitled to annual increment as per existing policy.
  - ii. He shall be governed by the N-WFP Civil Servants Act-1973 and all the laws applicable to the Civil Servants and Rules made there-under.
  - iii. He shall, for all intents and purposes, be Civil Servant except for the purpose of pension or gratuity. In lieu of pension and gratuity, he shall be entitled to receive such amount as would be contributed by him towards Contributory Provident Fund (C.P.F) along-with the contributions made by Government to his account in the said fund, in the prescribed manner.
  - iv. In case, he wishes to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
  - v. He shall produce a Medical Certificate of fitness from Medical Superintendent, Services Hospital, Peshawar, before joining duties in the Civil Secretariat, as required under the rules.
  - vi. He has to join at his own expenses.
  - vii. He shall be on probation for a period of two (02) years under Rule 15(1) of NWFP Civil Servant (Appointment, Promotion & Transfer), Rules 1989.
2. If he accepts the post on these conditions, he should report for duty to the undersigned within 14 days of the receipt of this order.

**SECRETARY HIGHER EDUCATION**

Endst. No & Date even.

A copy of the above is forwarded for information to the:-

2- TIFIED TO BE TRUE COPY

3- *[Signature]*  
4- arid Ullah Kundi  
5- Advocate-on-Record  
6- Supreme Court of Pakistan

- 2- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 3- Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 4- PS to Secretary, Higher Education Department.
- 5- PA to DS (Admn), Higher Education Deptt.
- 6- Mr. Khan Bahadar S/O Wazir Khan, R/O Village Gul Khan P.O. Shodag, District Charsadda.
- 7- Accountant, Higher Education Deptt.

*[Signature]*

*[Signature]*  
(AQBEEL AHMAD)

SECTION OFFICER (Estt. & Admn)

OFFICE OF THE PRINCIPAL GOVT: GIRLS DEGREE COLLEGE HAYATABAD  
(PESHAWAR).

OFFICE ORDER.

Consequent upon the recommendation of the Department Selection Committee, the undersigned is pleased to appoint Mr. Khan Bahadar S/O Wazir Khan Candidate against the vacant post in BPS-04 as Driver (5200-230-12100) pulse usual allowances as admissible under the rules from the date of taking over charge on the terms and conditions mentioned below at GGC, Hayatabad (Peshawar).

TERMS & CONDITIONS.

1. Their appointment is purely on temporary basis. and as per Govt. Policy
2. They should produce health and age certificate from the Civil Surgeon Peshawar
3. Their Service are liable to termination on one month notice from either side. In case of resignation without notice one pay shall be forfeited to the Government.
4. No. pension benefits whatsoever is allowed.
5. They shall be governed by such rules and regulations as framed from time to time by the Govt.
6. Charge report should be submitted to all concerned.
7. No.G.P.Fund contribution will be made; however they will contribute 10% of pay towards C.P.Fund.

PRINCIPAL  
GOVT: GIRLS DEGREE COLLEGE  
HAYATABAD (PESHAWAR)

Endst.No. 3209-3 /Appts:

Date 4/12 /2012

Copy of the above is forwarded for information to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Director of Higher Education Peshawar,
3. The Accountant local College.
4. The Class-IV concerned.

14  
PRINCIPAL  
GOVT: GIRLS DEGREE COLLEGE  
HAYATABAD (PESHAWAR)

CERTIFIED TO BE TRUE COPY

Fazila Ullah Kundi  
Secretary-on-Record  
Supreme Court of Pakistan



11 18 Annexure - B C-7  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

Dated Peshawar the 16<sup>th</sup> August, 2012 An-

ORDER:-

NO.SOG/HE/PF/Khan Bahadar/2011.

WHEREAS, Mr. Khan Bahadur was appointed as Driver in Higher Education Department, after completing all codal formalities, vide order bearing No. SOG/HE/PF/Khan Bahadar/2011 dated 01-10-2011.

2. WHEREAS, Administration Department, Khyber Pakhtunkhwa posted another Driver Mr. Jan Bahadur against said post vide Order No. E&A(AD)4(04)/2010 dated 12-7-2012 and subsequently advised this Department to cancel the appointment order of Mr. Khan Bahadur as Driver to adjust the fresh incumbent vide No. E&A(ED)04(04)/2010 dated 31-7-2012.

3. WHEREAS, the case was submitted to Chief Secretary, Khyber Pakhtunkhwa vide a note dated 7-8-2012 for final decision in the matter.

4. And WHEREAS, after examination of the case, the request of this Department was regretted by Chief Secretary, Khyber Pakhtunkhwa on 16-8-2012.

5. In view of the above, the Competent Authority in Higher Education Department hereby terminates the services of Mr. Khan Bahadur as Driver w.e.f 16-8-2012

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

Endst. No & Date even.

A copy of the above is forwarded for information to the:-

- 1- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2- Section Officer (Admn), Administration Department, Khyber Pakhtunkhwa.
- 3- PS to Chief Secretary, Khyber Pakhtunkhwa.
- 4- PS to Secretary, Higher Education Department.
- 5- PA to DS (Admn), Higher Education Deptt.
- 6- Accountant, Higher Education Deptt.
- 7- Official concerned.

CERTIFIED TO BE TRUE COPY

Farid Ullah Kundi  
Advocate-on-Record  
Supreme Court of Pakistan

(JAVED AKHTAR) 16/8/12  
SECTION OFFICER (Estt. & Admn)

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHWAR**

Service Appeal No. 1011/2012

BEFORE: MRS. ROZINA REHMAN ... MEMBER (J)

MISS. FAREEHA PAUL ... MEMBER (E)

Khan Bahadur Ex-Driver Higher Education Department, Peshawar.

(Appellant)

**VERSUS**

1. The Chief Secretary Govt. of Khyber Pakhtunkhwa, Peshawar.
  2. The Secretary Higher Education Govt. of Khyber Pakhtunkhwa, Peshawar.
  3. The Secretary Administration Department of Govt. of Khyber Pakhtunkhwa, Peshawar.
  4. Mr. Jan Bahadur Driver, Higher Education Department, Peshawar. ...
- (Respondents)

Mr. Ashraf Ali Khattak  
Advocate

For Appellant

Mr. Muhammad Riaz Paindakhel  
Assit Advocate General

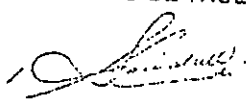
For respondents

-----  
Date of Institution.....14.09.2012  
Date of Hearing.... 31.05.2022  
Date of Decision.....31.05.2022

**JUDGEMENT**

**FAREEHA PAUL, MEMBER (E)**; The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribe Act, 1974, against the impugned order dated 16.08.2012 whereby service of the appellant had been terminated and order dated 10.09.2012 whereby his departmental appeal was rejected

CERTIFIED TO BE TRUE COPY

  
Farid Ullah Kundi  
Advocate-on-Record  
Supreme Court of Pakistan



2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as driver (BPS-04) on regular basis vide order dated 01.10.2012 by Higher Education Department Khyber Pakhtunkhwa Peshawar. He assumed his duty and started serving to the best of his capabilities and no complaint was ever lodged against him during his entire service period. Suddenly his services were terminated by the department vide order dated 16.08.2012 on the ground that another Driver, Mr. Jan Bahadur, had been appointed on the post of appellant by the Administration Department Government of Khyber Pakhtunkhwa vide its order dated 12.07.2012. Aggrieved from the impugned termination order appellant preferred departmental appeal dated 28.08.2012 but the same was regretted vide letter dated 10.09.2012 on the ground that termination order had been issued on direction of respondent No. 1, the Chief Secretary Khyber Pakhtunkhwa. Hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Assistant Advocate General and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that respondents had committed violation of Article 4 of the Constitution of Islamic Republic of Pakistan and that he was appointed on regular basis and services of regular employees could not be terminated without adhering to prescribed procedure. He further contended that neither a charge sheet and statement of allegations had been served upon the appellant nor any inquiry had been conducted. The appellant was not given any opportunity of personal hearing, neither was any show

REGISTERED  
Khyber Pakhtunkhwa  
Service Tribunal

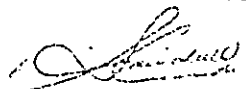
*[Handwritten signature]*

2 Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as driver (BPS-04) on regular basis vide order dated 01.10.2012 by Higher Education Department Khyber Pakhtunkhwa Peshawar. He assumed his duty and started serving to the best of his capabilities and no complaint was ever lodged against him during his entire service period. Suddenly his services were terminated by the department vide order dated 16.08.2012 on the ground that another Driver, Mr. Jan Bahadur, had been appointed on the post of appellant by the Administration Department Government of Khyber Pakhtunkhwa vide its order dated 12.07.2012. Aggrieved from the impugned termination order appellant preferred departmental appeal dated 28.08.2012 but the same was regretted vide letter dated 10.09.2012 on the ground that termination order had been issued on direction of respondent No. 1, the Chief Secretary Khyber Pakhtunkhwa. Hence the instant service appeal.

3. Respondents were put on notice who submitted written, replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Assistant Advocate General and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that respondents had in violation of Article 4 of the Constitution of Islamic Republic of Pakistan and that he was appointed on regular basis and services of regular employee could not be terminated without adhering to prescribed procedure. He further contended that neither a charge sheet and statement of allegation had served upon the appellant nor any inquiry had been conducted. The appellant was not given any opportunity of personal hearing, neither was any show

CERTIFIED TO BE TRUE COPY

  
Farid Ullah Kundi  
Advocate-on-Record  
Supreme Court of Pakistan

cause notice served upon him. His services had been terminated on flimsy grounds that since respondent No. 04 had been appointed on the post of appellant therefore his services stood cancelled.

5. The learned Assistant Advocate General argued that services of the appellant were terminated because Secretary Administration department had appointed 26 drivers in Civil Secretariat vide order dated 12.07.2012 under the powers vested in him vide section 4(3) of Appointment/Promotion and Transfer Rules 1989 of the recruitment policy which states, "Initial recruitment to posts in BPS-15 and below other than the posts in the purview of the Public Service Commission, in all the departments shall continue to be made in accordance with Rule 10, 11 and 12 (Part-III) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the criteria as laid down in S&GAD letter No. SORI(S&GAD)4-1/75, dated 11.02.1987 and the zonal allocation formula contained in S&GAD notification No. SOS.III(S&GAD)3-39/70 dated 02.10.1973 as amended from time to time." Since appointment of the appellant was neither in accordance with Section 3 of (Appointment Promotion and Transfer) Rules nor in accordance with recruitment policy therefore it was cancelled.

TESTED

6. After going through the entire record available before us and hearing the arguments put forth by the learned counsels it is clear that appointment order of the appellant was issued by the Govt. of Khyber Pakhtunkhwa Higher Education Department in the name of Secretary Higher Education who, in our opinion, is a responsible person and it not expected that he would go against the Appointment, Promotion and Transfer Rules 1989. He issued that order under Rule 10 and sub rule 2 of APT rules which is very clear that initial


Original  
for  
Khyber Pakhtunkhwa

cause notice served upon him. His services had been terminated on flimsy grounds that since respondent No. 04 had been appointed on the post of appellant therefore his services stood cancelled.

The learned Assistant Advocate General argued that services of the appellant were terminated because Secretary Administration department had appointed 26 drivers in Civil Secretariat vide order dated 12.07.2012 under the powers vested in him vide section 4(3) of Appointment/Promotion and Transfer Rules 1989 of the recruitment policy which states, "Initial recruitment to posts in BPS-15 and below other than the posts in the purview of the Public Service Commission, in all the departments shall continue to be made in accordance with Rule 10, 11 and 12 (Part-III) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the criteria as laid down in S&GAD letter No. SORI(S&GAD)4-1/75, dated 11.02.1987 and the zonal allocation formula contained in S&GAD notification No. SOS.III(S&GAD)3-39/70 dated 02.10.1973 as amended from time to time." Since appointment of the appellant was neither in accordance with Section 3 of (Appointment Promotion and Transfer) Rules nor in accordance with recruitment policy therefore it was cancelled.

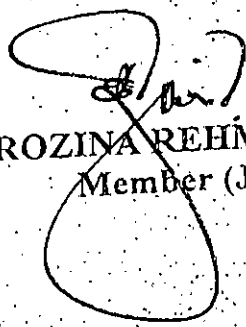
6. After going through the entire record available before us and hearing the arguments put forth by the learned counsels it is clear that appointment order of the appellant was issued by the Govt. of Khyber Pakhtunkhwa Higher Education Department in the name of Secretary Higher Education who, in our opinion, is a responsible person and it not expected that he would go against the Appointment, Promotion and Transfer Rules 1989. He issued that order under Rule 10 and sub rule 2 of APT rules which is very clear that initial

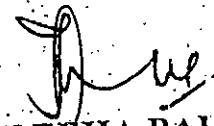
CERTIFIED TO BE TRUE COPY

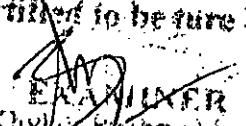
  
Farid Ullah Kundi  
Advocate-on-Record  
Supreme Court of Pakistan

recruitment to posts which do not fall within the purview of Commission shall be made by Departmental Selection Committee after vacancies are advertised in newspaper. Appointment order of the appellant indicates that his services were governed by Civil Servants Act 1973 and all the rules made there-under. In view of that it was noted that the entire action taken against him was not in accordance with the law/rules. The appeal in hand is therefore allowed and the impugned orders dated 16.08.2012 and 10.09.2012 are set aside. Respondents are directed to reinstate the appellant in service with effect from 16.08.2012 with all back benefits including his service, salary and other allied benefits. Parties are left to bear their own costs. Consign.

7. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 31<sup>th</sup> day of May, 2022.

  
 (ROZINA REHMAN)  
 Member (J)

  
 (FAREEHA PAUL)  
 Member (E)

Certified to be true copy  
  
 EXAMINER  
 Khyl of Peshawar  
 Service Tribunal  
 Peshawar

Date of Presentation of Application 31-5-22  
 Number of Words 2000  
 Copying Fee 22/-  
 Urgent \_\_\_\_\_  
 Total 22/-  
 Name of Copyist \_\_\_\_\_  
 Date of Completion of Copy 25/7/22  
 Date of Delivery of Copy 25/7/22

(For use in Police Department only)

14

Heirs:

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

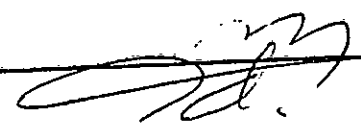
Left Thumb Impression

Passed SSC Examination  
Under RNo. 19784 in  
Session Annual 1993 -  
obtaining 410 marks

Qualification	Date	Qualification	Date
English		First Arts Principal Govt. Girls Degree College Hayatabad	
Pushto		B.L. Or B.A.	
Urdu		Pleadership examiantion	
Plan-drawing		Training School Final examiantion	
Finger Print		Other qualification:—	
Drill Instructing			
Court Duties			
Reserve Duties			

CERTIFIED TO BE TRUE

Ferid Lillah Kundi  
Principal  
Govt. Degree College  
Tangi



Principal  
Govt. Degree College  
Tangi

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 lines 9 and 10 should be dated.

1. Name: MR, KHAN BAHADAR

2. Race: Afghan

3. Residence: Vill: Chahal Gul Khun P.O Shodag Tehsil Tangi Distt Charsadda

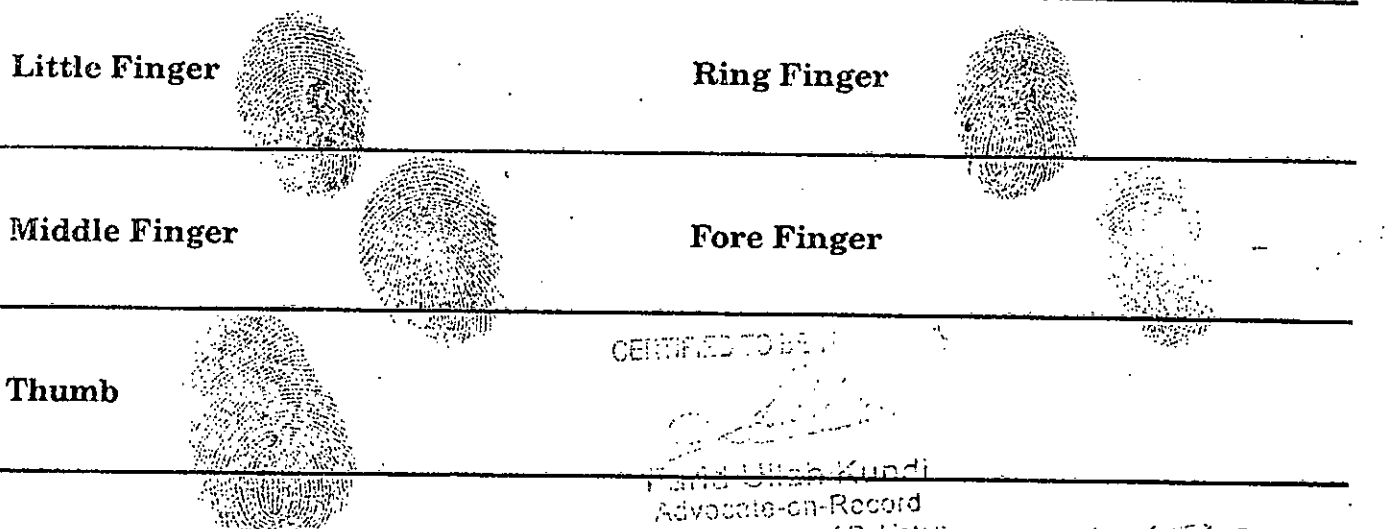
4. Father's name and residence: WAZIR KHAN

5. Date of birth by Christian era as nearly as can be ascertained: 04-05-1977 Fourth May N.H. Month seventy seven

6. Exact height by measurement:

7. Personal marks for identification: Nil

8. Left hand thumb and finger impression of (Non-Gazetted) officer:



CERTIFIED TO BE  
Farid Ullah Kundi  
Advocate-on-Record  
Supreme Court of Pakistan

9. Signature of Government Servant: [Signature]

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

[Signature]  
Principal  
Govt Degree College  
Tangi

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 "p"	Date of appointment	Signature of Government Servant.
Driver G.G.D.C. Huyntubud P. 7 Pasbarim		B.P.S. 04 (Rs. 5200-2300-12100)					
do			Rs. 5200/-	P.M.		4/12/2012	
do			Rs. 5200/-	P.M.		11/1/2013	
do			Rs. 5430/-	P.M.		1/12/2013	
R.P.G.C. Chauvada			Rs.				
CERTIFIED TRUE COPY							
 Justice Uday Lalit Supreme Court of India							
							Principal Govt Degree College



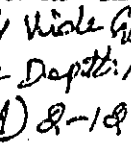
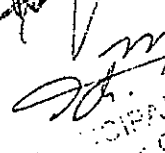
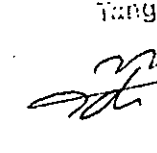
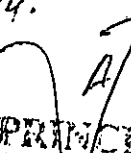
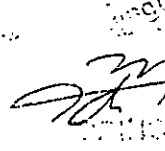
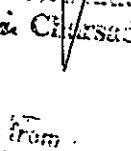
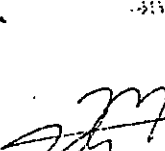
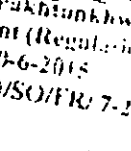
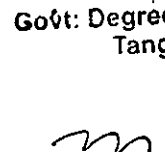
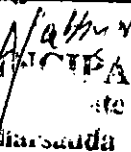
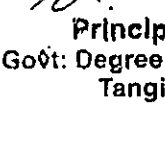



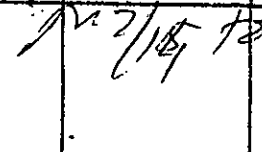





9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure 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			
					Period			Government to which debitable
				Appointed as Driver in B/S-04 @ Rs(5200-230-12100) P.L.S. usual Allowance vide this office Order No: 32093 Dated 4-12-2012.				
				Principal Govt Girls Degree College Hayatabad				
	11/1/2013	Transfer		Principal Govt Girls Degree College Hayatabad				
				F.R. 196-97 dt 10/4/2013 - F.R. No. 320 dt 20/3/2013				
				Pay started w.e.f. 4/12/2012 to 31-12-2012				
				1/Jan/2013 to 31/3/2013				
				Bsr 35754/2				
				Assistant Accounts Officer				
				Accountant General Khyber Pakhtunkhwa Peshawar				
	11/4/2013			Service Verified with effect from - 4-12-2012 to 11-1-2013 from the relevant records.				
				Principal Govt Degree College Tangi				

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 "p"	Date of appointment	Signature of Government Servant
Driver							
Grant: Postgraduate College Charsadda		BPS-04 (5200-230-12100)					
			Rs. 5430/- P.M			04/03/2014	
			Rs. 5660/- P.M			1/7/2014	
			Rs. 5890/- P.M			1/12/2014	
			Rs. 5890/- P.M			30/6/2015	
CERTIFIED TO BE TRUE COPY		BDS-4 (6730-302-15730)					
Paria M. Arsoo Supreme Court	S. M. Ali Secretary		Rs. 7630/-			1/7/2015	
		BPS-6 (7235-375-18685)					
			7985/- 375/- 8360/-	NATURAL per original invernal-		1/7/2015	
	Principal Govt: Degree College Tangi		Rs.			1/7/2015	

9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure 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		
					Period		
<i>I</i>		Annual Normal	<i>I</i>		Mr. Khan Bahadur Driver B-4 Transfer in college vide DHE Order No 857-61 dt 11/1/2013		
Principal GOVT. DEGREE COLLEGE, BADABER (DIST. PESH.)			Principal GOVT. DEGREE COLLEGE, BADABER (DIST. PESH.)			<i>I</i>	
Principal Govt. Post Graduate College Charsada	30/6/2014	one premature chor. 3 mos.	Principal Govt. Post Graduate College Charsada			Principal GOVT. DEGREE COLLEGE BADABER (DIST. PESH.)	Service Verified w.e.f. 12-1-2013 to 31-1-2014 from the Agent ROB & given record available in this office
Principal Govt. Post Graduate College Charsada	30/11/2014	1/9 mos.	Principal Govt. Post Graduate College Charsada			Principal GOVT. DEGREE COLLEGE, BADABER (DIST. PESH.)	
Principal Govt. Post Graduate College Charsada			Principal Govt. Post Graduate College Charsada		TK-324-1094		
CERTIFIED TO BE TRUE COPY							
Principal Govt. Post Graduate College Charsada	12/2015		Principal Govt. Post Graduate College Charsada		on file of Record Supreme Court of Pakistan		
Principal Govt. Post Graduate College Charsada			Principal Govt. Post Graduate College Charsada				
Principal Govt. Post Graduate College Charsada	20/2015		Principal Govt. Post Graduate College Charsada				
Principal Govt. Post Graduate College Charsada	30/6/2015		Principal Govt. Post Graduate College Charsada			Principal Govt. Degree College Tangi	

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 "p"	Date of appointment	Signature of Government Servant.
<i>Driver</i>							
<i>G.P.H.C. chd.</i>		<i>Rs. 8735/- P.M.</i>				<i>12/2015</i>	
		<i>Reversion of pay scale w.e.f 01-07-2015 (BPS-16 (880-120-2300))</i>	<i>Rs. 10780/- P.M.</i>			<i>01/07/2015</i>	
			<i>Rs. 11250/- P.M.</i>			<i>01/07/2017</i>	
		<i>Revised of Pay Scale 2017</i>				<i>01/07/2017</i>	
		<i>(BPS-6: 10620-560-2720)</i>	<i>Rs. 13420/-</i>			<i>1/7/2017</i>	
			<i>Rs. 13920/-</i>			<i>12/2017</i>	
			<i>Rs. 14540/-</i>			<i>12/2018</i>	
	<i>CERTIFIED TO BE TRUE COPY</i>						
	<i>Fazil Ullah Advocate Supreme Court Islamabad</i>	<i>Fazil Ullah Advocate Supreme Court Islamabad</i>					<i>Principal Govt. Degree College Tangi</i>

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or 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		
					Period		
 PRINCIPAL Govt. Degree College	30/6/2016	R/O for Scull	 PRINCIPAL Govt. Degree College		Allowed one presumptive leave w.e.f. 1-7-2014 vide Govt. O.P.K. Res. Finance Deptt. Notification No. FD(SOSR-D) 2-183/2014	 PRINCIPAL Govt. Degree College	Govt. O.P.K. No. FD(SOSR-D) 2-183/2014
 PRINCIPAL Govt. Degree College	30/11/2016	None	 PRINCIPAL Govt. Degree College		Dated 14-7-2014.	 PRINCIPAL Govt. Degree College	
 PRINCIPAL Govt. Degree College	30/6/2017					 PRINCIPAL Govt. Degree College	
 Principal Govt. Degree College Tangi	30/6/2017	Revised of Pay Scale			Post-graduation from B.A. to B.A. + B.Ed. via Finance department (Regulation wing) Govt. Order Dated 30-6-2015 Notification No. 10/SO/FR 7-20/2015 Dated 30-6-2015	 PRINCIPAL Govt. Degree College	
 Principal Govt. Degree College Tangi	30/11/2017	Annual Increment				 PRINCIPAL Govt. Degree College	
 Principal Govt. Degree College Tangi	30/11/2018	Annual Increment				 PRINCIPAL Govt. Degree College	
 Principal Govt. Degree College Tangi					27/15 to 10/15		
 Principal Govt. Degree College Tangi							
 Principal Govt. Degree College Tangi							
 Principal Govt. Degree College Tangi							

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 "p"	Date of appointment	Signature of Government Servant.
Driver GDC Tangi				Rs. 15100/-		01/12/2019	
BS-06							

CERTIFIED TO BE TRUE COPY

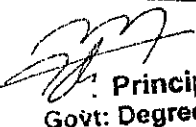
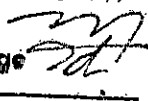
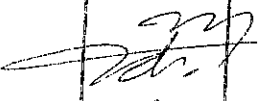
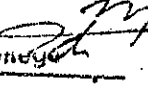
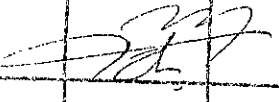
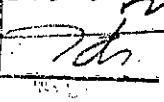

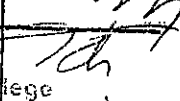
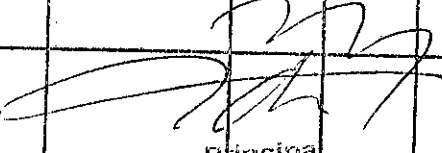
Farooq Ahmad Nundi  
Administrative Record  
Supreme Court of Pakistan

Principal  
Govt. Degree College  
Tangi


9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure 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 debitible to another Government			
					Period			Government to which debitible
						10-20/4	20-11-2015	
						Service verified w.o.f. in the record of this office.		
	Annual increment 01-12-2019					Principal Govt: Degree College Tangi		
						Principal Govt: Post Graduate College Charsadda		
						Transferred to GDC Tangi (CHD) Vide E.O. No. 841-46 Dated 20/8/2018		
						Principal Govt: Post Graduate College Charsadda		
						Service verified w.o.f. to 20/12/2015 from the Adm. Office & other record of this office.	01-12-2015	
						Principal Govt: Degree College Tangi		
						CERTIFIED TO BE TRUE COPY.		
						TR-98 Dated 07-9-2021 Drawn after Rs-20381/- on A/c of DRS Allowance w.o.f. 10/2011 To 31-8-2021.		
						Principal Govt: Degree College Tangi		
						Service verified w.o.f. 01-01-2017 to 31-12-2017 from the college record.		
						Principal Govt: Degree College Tangi		



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 "p"	Date of appointment	Signature of Government Servant.
Driver EADC Tangi BS-06					Rs. 15660/-	01/12/2020	
Driver EADC Tangi BS-06							
Driver EADC Tangi BS-06							
Driver EADC Tangi BS-06				CERTIFIED COPY Principal Govt. Degree College Tangi			
Driver- EADC Tangi BS-06					Rs. 16220/-	01/12/2021	
			Principal Govt. Degree College Tangi				

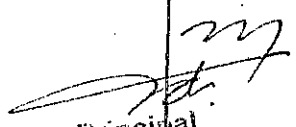
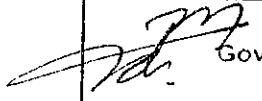
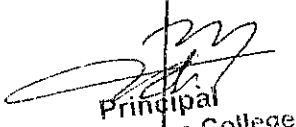
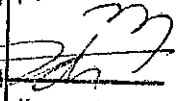
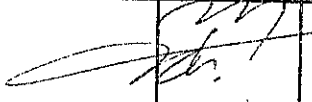
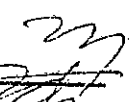

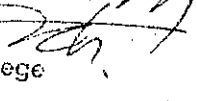
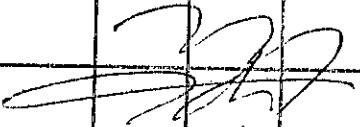



9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure 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 debitible to another Government			
					Period			Government to which debitible
 Principal Govt: Degree College Tangi	Annual increment 01-12-2020				Service verified w-r-g 01-01-2018 to 31-12-2018 From the college record.	 Principal Govt: Degree College Tangi		
 Principal Govt: Degree College Tangi					Service verified w-r-g 01-01-2018 to 31-12-2018 From College record	 Principal Govt: Degree College Tangi		
 Principal Govt: Degree College Tangi					Service verified w-r-g 01-01-2020 to 31-12-2020 From College record	 Principal Govt: Degree College Tangi		
 Principal Govt: Degree College Tangi					Annual increment 1-r. 01-12-2021	 Principal Govt: Degree College Tangi		
			 Principal Govt: Degree College Tangi					

CERTIFIED TO BE TRUE COPY

  
Parid Ullah Kundi  
Advocate & Barrister  
Supreme Court, New Delhi

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 "p"	Date of appointment	Signature of Government Servant.
Driver GDC Tangri BS-06					Rs. 16220/-		
Driver GDC Tangri BS-06					Rs. 2433/-	01/08/2022	
Driver GDC Tangri BS-06					Rs. 24160/-	01/08/2022	
Driver GDC Tangri BS-06			CERTIFIED TO BE TRUE COPY	 Farid Ali Kundi Address: ... Supreme Court of Pakistan			
			 Principal Govt. Degree College Tangri				

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
				Nature and duration of leave taken.	Government to which debitable		
 Principal Govt: Degree College Tangi					Service verified e-8- from 01-01-2022 to 31-12-2022	 Principal Govt: Degree College Tangi	
 Principal Govt: Degree College Tangi					Disparity reduction Allowance from 19 May 2022	 Principal Govt: Degree College Tangi	
 Principal Govt: Degree College Tangi					Basic Pay revised that is from 01-07-2022	 Principal Govt: Degree College Tangi	
 Principal Govt: Degree College Tangi					Service verified that is from 01-07-2022 bill date i.e. 15-08-2022	 Principal Govt: Degree College Tangi	
 Principal Govt: Degree College Tangi		CERTIFIED TO BE TRUE COPY  Principal Govt: Degree College Tangi			Service continue.		