

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1532/2022

Syed Shahin Shah.....Appellant.

V/S

Secretary Finance Division Islamabad & others.....Respondents

(Para wise reply on behalf of Respondent No.3, 4 & 5)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4452

Dated 17/3/2023

Preliminary Objections:-

- 1) That the Appellant has no cause of action and locus standi.
- 2) That the Appellant has not come to this Court with clean hands.
- 3) That the Appellant has concealed material facts from this honorable Court.
- 4) That the instant appeal is badly time barred.

Respectfully Sheweth:-

- 1) No Comments.
- 2) Relates to record however, liable to be proved by the Appellant.
- 3) Relates to record however, liable to be proved by the Appellant.
- 4) Relates to record however, liable to be proved by the Appellant.
- 5) That in light of Finance Department Notification dated: 21.02.2014, respondent No. 4 & 5 has issued the Revised Pay Slip ON 20.07.2022 (Annex-A) to the appellant w.e.f 06.05.1996 to 01.03.2022 up to dated. And in this regard the Administrative department of the appellant has prepared and submitted the arrear claims amounting to Rs. 15,14,798/- which returned to Finance Department Peshawar through administrative department vide this office letter No.183, dated: 23.12.22 (Annex-B) for obtaining investigation sanction of arrears under para 8(1) of delegation of Financial powers rules 2018 but not yet submitted up till now. As and when received the same will be entertained and processed without any delay.

- 6) As mentioned in para "5" above to the extent that this office has already entertained and processed the LPR claims equal to 365 days for amounting to Rs-12,52,320/- of the appellant (Annex-C).

Grounds:-

- A. As mentioned in para "5" above..
- B. As mentioned in Para "5" above to the extent that the advance increment have already been allowed in Revised Pay Slip issued by this office.
- C. As mentioned in para "5" above.
- D. As mentioned in Para "5" above.
- E. As mentioned in Para "5" above to the extent that the statement of arrears of basic pay and allowances is attached.
- F. That in Revised Pay Slip the Basic Pay of the appellant on 01.01.2019 has been fixed as amounting to Rs. 95,750/- + PP. 2870/- is correct and under the rules (Annex-A).
- G. No comments.

Keeping in view the above mentioned facts it is, therefore, humbly prayed that grievances of the appellant has been redressed and nothing els, on the part of respondent No. 3 , 4 & 5. Hence the appeal in hand having no merits may be dismissed with cost.


AUDITOR
(PAY ROLL-5)


ACCOUNTS OFFICER
(PAY ROLL-5)


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

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AFFIDAVIT

I, Syed Tariq Shah, Senior Auditor, Office of the Accountant General Khyber Pakhtunkhwa Peshawar do hereby solemnly affirms & declare that the contents of reply submitted on behalf of Respondent No.3 , 4 & 5 is true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Court.

Tariq

DEPONENT

NIC-17307-1327637-9

cell. 0346 9191985.

ATTESTED



16-03-2023