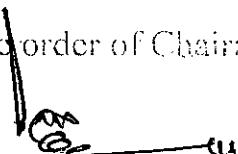


FORM OF ORDER SHEET

Court of _____

Case No. _____

614/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/03/2023	<p style="text-align: center;">By the order of Chairman</p> <p>The appeal of Mr. Sana Ullah Khan resubmitted today by Mr. Muhammad Tariq Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>22/3/23</u>. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <div style="text-align: right;">  REGISTRAR </div>

The appeal of Mr. Sana Ullah Khan son of Umar Daraz Khan Junior Clerk AD, RDD Bannu received today i.e. on 15.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal be got signed by the appellant.
- 2- Certificate be furnished that whether any appeal on the subject matter has earlier been filed in this Tribunal.
- ③- Copies of pay roll mentioned in para-6 of the memo of appeal are not attached with the appeal which may be placed on it.

No. 970 /S.T,

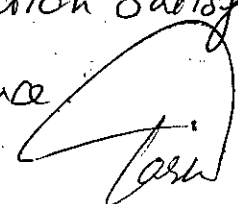
Dt. 16/3 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Tariq Adv.
High Court at Peshawar.

Respected Sir,

*As per direction objection satisfied.
Therefore, resubmitted after compliance*


Advocate

BEFORE THE PROVINCIAL SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA PESHAWAR

Service Appeal No. 614 /2023

Sana Ullah Khan Versus Deputy Commissioner, Bannu & another

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S.No	Description	Annexure	Page
1.	Ground of Appeal	-	01-05
2.	Application for condonation of delay	-	06-07
3.	Copy of the Appointment Order Dated 15/12/1994	"A"	08
4.	Copy of the Order dated 13/08/1995	"B"	09
5.	Copy of the Order dated 12/11/1998	"C"	10
6.	Copy of the Seniority List of Junior Clerks	"D"	11-12
7.	Copy of the Office Order dated 10/12/2004	"E"	13
8.	Copy of the Appeal/Representation	"F"	14
9.	Copy of the Letter Dated 25/08/2021	"G"	15
10.	Copy of the Letter Dated 20/09/2021	"H"	16
11.	Copy of the Letter Dated /10/2021	"I"	17
12.	Copy of the Application dated 18/08/2022	"J"	18
13.	Copy of the Letter dated 24/11/2022	"K"	19
14.	Copy of the Payroll are Annexure	"L"	20-22
15.	Wakala Nama	-	23

Appellant

Through

(Muhammad Tariq)

Advocate,
Supreme Court of Pakistan

Office Address: 2nd Floor Al-Mansoor Hotel Opp: Gulbahar Police Station
G.T.Road Peshawar

Cell # 0333-9385283

CNIC # 17301-4574728-9

BC# BC-11-1564

Email: tariq.adv.hc@gmail.com

(1)

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA PESHAWAR**

Service Appeal No. 614 /2023

Sana Ullah Khan S/O Umar Daraz Khan, Junior Clerk (BPS-07), AD & RDD,
Bannu

(Appellant)

VERSUS

1. Deputy Commissioner, Bannu
2. Assistant Director, Local Government & Rural & Development
Authority, Bannu

(Respondents)

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHAWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE REFUSAL OF RESPONDENTS
TO REVIEW THE OFFICE ORDER NO.8972-
76/ESTAB/DCO/BANNU DATED 10/12/2004.**

Respectfully Sheweth:

Brief facts of the case giving rise to instant Writ Petition are as under:

1. That Appellant was appointed as Junior Clerk in (BPS-5) vide Office

Order No 6565-67/ST/BC Dated 15/12/1994 by Respondent 01.

(Copy of the Appointment Order Dated 15/12/1994, Order dated 13/08/1995, Order dated 12/11/1998 are Annexure "A" to "C")

2. That Appellant was declared surplus on 25/10/2000 and thereafter was adjusted as Secretary Union Council in the Office Assistant Director, Local Government & Rural & Development Authority, Bannu vide Order No.8972-76/Esbl/DCO/Bannu dated 10/12/2004 which is against the section 11-A of the Civil Servant Act, 1973.(Copy of the Seniority List of Junior Clerks, Office Order dated 10/12/2004 is Annexure "D" & "E")
3. That in the year 2007 Khyber Pakhtunkhwa Finance Department upgraded the post of Junior Clerk from BPS-05 to BPS-07. Thereafter, again Khyber Pakhtunkhwa Finance Department upgraded the post of Junior Clerk from BPS-07 to BPS-011 vide Notification dated 20/05/2014.
4. That Appellant has filed an Appeal before Respondent 01 for reviewing the Order Dated 10/12/2004 on 05/07/2021. (Copy of the Appeal/Representation is Annexure "F")
5. That thereafter Appellant has moved number of applications to the Respondents for reviewing the Order dated 10/12/2004 and Respondent 02 recommended/support the request of the Appellant that Appellant may be accommodated in the office of the Respondent

- 01 as Junior Clerk(BPS-11) with all back benefits. But, Respondent 01 has not taken into consideration the recommendation of the Respondent 02.(Copy of the Letter Dated 25/08/2021, Letter Dated 20/09/2021 and Letter Dated /10/2021 are Annexure "G" to "I")
6. That Appellant has filed an application dated 18/08/2022 to the Respondent 02 for passing the appropriate order which were communicated by the Respondent 01.(Copy of the Application dated 18/08/2022 and Letter dated 24/11/2022, Payroll are Annexure "J" to "L")
7. That, thereafter, Appellant approached the Respondents several time but till date Respondent 01 has neither not decided the Appeal/Representation of the Appellant and nor the same has been communicated to the Appellant.
8. That Appellant highly aggrieved from the acts and deeds of Respondents hence beseech the indulgence of the august Tribunal on the following

GROUNDS: -

- a. That acts and deeds of Respondents are tainted with mala fide, the same are in derogation of provisions of the Constitution of Islamic Republic of Pakistan, 1973.
- b. That the acts and deeds of Respondents are illegal, without lawful authority, without jurisdiction and worst example of discrimination.

- c. That treatment met out to the Appellant is clear cut violation of the verdicts of the Apex Supreme Court of Pakistan and principle of Natural Justice.
- d. That impugned Order dated 10/12/2004 and acts and deeds of the Respondents are incorrect, illegal and utter disregard of the well settle principle of law. As such, the same is liable to be set aside.
- e. That Order dated 10/12/2004 Respondent adjust the Appellant on the post of Secretary Union Council instead of Junior Clerk. Therefore, impugned Order dated 10/12/2004 of Respondent is against the provision of the section 11-A of the Civil Servant Act, 1973. Hence, impugned Order dated 10/12/2004 is not sustainable in the eyes of law.
- f. That Appellant through Secretary Union Council is performing his duties with Respondent 01 as Benevolent Fund Clerk and Appellant has moved application to the Respondents for reviewing the impugned Order dated 10/12/2004 and Respondents without any plausible reason not considering the request of the Appellant and delay matter on one pretext and another. Appellant has also filed appeal before Respondents which is still not decided by them. As such, Respondents have violated the clear cut policy of the Provincial Government.
- g. That Respondents have not treat the Appellant in accordance with law, rules and policy on the subject and acted in violation of relevant provision of well settle principle of law.

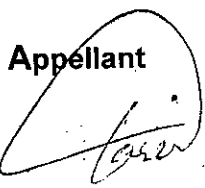
3

h. That any other ground may be agitated at the time of arguments
with kind permission of this honorable Court.

It is, therefore, respectfully prayed that on
acceptance of appeal in hand, Respondents may very graciously be directed to
review the impugned Order dated 10/12/2004 and Appellant may be
repatriated/accommodated in the Office of Respondent 01 as Junior Clerk (BPS-
11) with all back benefits OR other order deemed proper in the matter which has
not been specifically asked for may also be granted in favour of Appellant against
Respondents.

Appellant

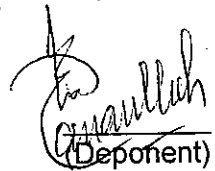
Through



(Muhammad Tariq)
Advocate,
Supreme Court of Pakistan

AFFIDAVIT

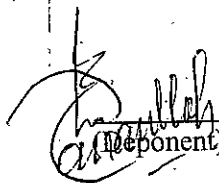
It is hereby solemnly affirm and declare on oath that contents of Service Appeal
are true and correct to the best of my knowledge and belief and nothing has been
kept secret from this honorable Tribunal.



(Deponent)

CERTIFICATE

Certified that no such Service Appeal has been filed earlier on the subject matter
in this honorable Tribunal.



(Deponent)

(6)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA PESHAWAR

Service Appeal No. _____ /2023

Sana Ullah Khan Versus Deputy Commissioner, Bannu & another

Application for Condonation of Delay if

any caused in filing of captioned Service

Appeal in hand

Respectfully Sheweth:

1. That the captioned appeal in hand has been filed along with application wherein no date of hearing is filed so far.
2. That Appellant/Applicant pray for condonation of delay if any caused in filing of the captioned appeal on the following

GROUNDS:

- A. That Applicant/Appellant has departmental appeal/representation before the Respondent 01 for reviewing the Order Dated 10/12/2004 on 05/07/2021. Thereafter, Appellant has moved number of applications to the Respondents for reviewing the Order dated 10/12/2004 and Respondent 02 recommended/support the request of the Appellant that Appellant may be accommodated in the office of the Respondent 01 as Junior Clerk(BPS-11) with all back benefits. But, Respondent 01 has not taken into consideration the recommendation of the Respondent 02.

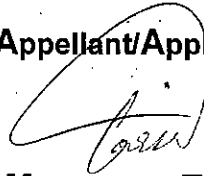
Appellant has filed an application dated 18/08/2022 to the Respondent 02 for passing the appropriate order which were communicated by the Respondent 01. But till date, Respondent 01 has not decided the Departmental Appeal/Representation of Appellant inspite of several requests were made by the Appellant but in vain. As such, delay if any accrued in filing of Service Appeal then in the larger interest of justice, delay may very graciously be condoned.

B. That there is no legal bar in condoning the bona fide delay occasioned in filing of appeal.

It is, therefore, respectfully prayed that on acceptance of instant application, delay if any in filing of service Appeal may very graciously be condoned.

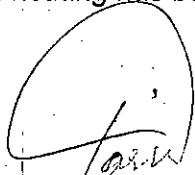
Appellant/Applicant

Through


(Muhammad Tariq)
Advocate,
Supreme Court of Pakistan

AFFIDAVIT

It is hereby solemnly affirm and declare on oath that contents of Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this honorable Tribunal.


(Deponent)

ORDER

Annex
A

8

Consequent upon the declaration of result of the successful candidates, Mr. Sanaulah Khan s/o Umar Daraz r/o Nogari Mamash Khel Tehsil and District Bannu is hereby appointed as Junior Clerk in BPS-5, (1400-66-2390) against the vacant post in the office of the undersigned with immediate effect subject to the approval of Departmental Promotion Committee.

(SHAH RUKH ARRAB)

Deputy Commissioner, Bannu.

No. 6565-67 /ST/BC, Dated 15/12/1994.

Copy forwarded to the :

1. District Accounts Officer Bannu.
2. Assistant Bill Clerk (G) E.C. Bannu, for information and necessary action.
3. Mr. Sanaulah Khan s/o Umar Daraz Khan r/o Nogari Mamash Khel Teh and Distt Bannu. He is directed to obtain Health and age certificate from the Medical Superintendent S&T DHQ Hospital Bannu.

(SHAH RUKH ARRAB)

Deputy Commissioner, Bannu.

ORDER

Consequent upon the declaration of result of the successful candidates, Mr. Sana Ullah Khan S/O Umar Daraz Khan r/o Nogari Kamash Khel Tehsil and District Bannu is hereby appointed as Junior Clerk in BPS-5, (1400-66-2390) against the vacant post in the office of the undersigned with immediate effect subject to the approval of Departmental Promotion Committee.

(SHAH RUKH ABRAR)

Deputy Commissioner, Bannu.

No.6565-67/ST/BC.

Dated 15/12/1994

Copy forwarded to the :

1. District Account Officer Bannu.
2. Assistant Bill Clerk (G) E.O .Bannu, for information and necessary action.
3. Mr. Sanaullah Khan s/o Umar Daraz Khan r/o Nogari Namash Khel The and Distt Bannu. He is a directed to obtain Health and age certificate from the Medical Superintendent HQ DHQ Hospital Bannu.

(SHAH RUKH ABRAR)

Deputy Commissioner, Bannu.

Annex
3

9

ORDER

On the recommendations/approval by departmental promotion/selection Committee in a meeting held on 24.7.1995 the appointments of the following employees already working against the vacant posts are regularized with immediate effect:-

1. Rafiqullah Khan, Junior Clerk.
2. Sadiqo Zaman, Junior Clerk.
3. Shahidullah, Junior Clerk.
4. Sanaullah Khan, Junior Clerk.
5. Hasnullah Khan, Junior Clerk.
6. Muhammad Sajjad Chowkidar.
7. Sanaullah Khan, Naib Qasid.
8. Sadar Nawaz, Naib Qasid.
9. Amrullah Khan, Chowkidar.

Deputy Commissioner, Bannu.

Handwritten signature

No. 5502-01/EC Dated 13/ 8/ 1995.

Copy to:-

1. The Secretary, Board of Revenue, NWFP Peshawar.
2. The Assistant Commissioner, Bannu.
3. ABC(G) English Office, Bannu for necessary action and to make necessary entries in the service books of the officials concerned.

Deputy Commissioner, Bannu.

Handwritten signature

Handwritten notes:
کاپی کے لئے
مقررہ وقت پر

ORDER

On the recommendation/approved by departmental promotion/selection Committee in meeting held on 24.7.1995 the appointment of the following employee already working against the vacant posts are regularized with immediate effect:-

1. Rafiullah Khan, Junior Clerk.
2. Sadique Zaman, Junior Clerk.
3. Shahidullah, Junior Clerk.
4. Sanaullah Khan, Junior Clerk.
5. Ihsanullah Khan, Junior Clerk.
6. Mohammad Sajjad, Chowkidar.
7. Sanaullah Khan, Junior Clerk.
8. Sadar Nawaz, Naib Qasid
9. Asmatullah Khan, Chowkidar

Deputy Commissioner, Bannu

Signature in Urdu

No.5502-04/BC

Dated 13/8/1995

Copy to :-

1. The Secretary, Board of Revenue, NWFP Peshawar
2. The Assistant Commissioner, Bannu.
3. ABC(G) English Office, Bannu for necessary action and to make necessary entries in the service books of the officials concerned.

Deputy Commissioner, Bannu

R D E H .

In accordance with the instruction contained in the
Govt. of NWFP Finance Deptt: Peshawar circular memo No. FD(FCR)1-1-188
dated 11.8.1991, the advance increment with effect from 28.10.1997 is
herby sanctioned in respect of Mr. Sabaulah Khan II J/Clerk of this
office having attained of higher educational qualification of M.A.

10

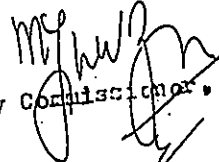
Annex
C

Deputy Commissioner., Bannu.

No. 7093-95/BC-I dated Bannu the. 12/11/1998.

Copies forwarded to:

1. The Distt: Account Officer, Bannu.
2. The ABC(G) for necessary action.
3. Mr. Sabaulah Khan II J/Clerk for information w/r
to his application dated 23/9/98.


Deputy Commissioner., Bannu. 11.11.98

ORDER

In accordance with the instruction contained in the Govt: of NWFP Finance Deptt: Peshawar circulation memo No. FD(PRC)1-1-188 dated 11.8.1991, the advance increment with effect from 28.10.1997 is hereby sanctioned in respect of Mr. Sanaullah Khan II J/Clerk of this Office havint attained of higher Education qualification of M.A.

Deputy Commissioner, Bannu

No.7093-95/BC-I dated Bannu the. 12/11/1998

Copy forwarded to:

1. The Distt: Account Officer, Bannu.
2. The AEC(G) for necessary action.
3. Mr. Sanaullah Khan II J/Clerk for information w/r to his application dated 23/9/98.

Signature in English

Deputy Commissioner, Bannu

(P.....2)

31.	Mr. Sultan Niaz	14/9/1961	F.A	1/6/1991	13/9/2021
32.	Hazrat Ali	24-01-1967	D.Com/MA	01-01-1992	23-01-2027
33.	Mr. Ihsanullah-I	5/8/1971	B.A	2/1/1992	4/2/2031
34.	Mr. Mohammad Nadim	12/4/1969	M.A	4/1/1992	11/4/2029
35.	Mr. Inamullah	30/12/1967	Metric	11/4/1992	19/12/2027
36.	Mr. Jamshid Khan	1/1/1966	B.A	1/9/1992	31/12/2025
37.	Mr. Raqiaz Khan	1/1/1968	M.Sc, MA	1/9/1992	6/1/2028
38.	Mr. Zahid Ali	1/6/1968	B.A	1/9/1992	2/6/2028
39.	Mr. Jahanzeb Khan.	22.10.1968	58 D.Com.	1.9.92	21.10.2028.
40.	Mr. Mir Nid Nawaz	03.09.1969	F.A.	03-9-1992	02.05.2029.
41.	Mr. Ihsanullah II	01.08.1966	B.Com.	05.09.1992	31.07.2026.
42.	Mr. Saadullah-I	10.10.1973	Metric.	11.11.1992	09.10.2033.
43.	Mr. Mohammad Hashim	10.03.1966	B.A.	28.11.1992	09.03.2025.
44.	Mr. Shah Niaz	15.05.1972	F.A.	06.12.1992	15.05.2032.
45.	Mr. Hazer Das.	01.03.1968	B.A.	16.12.1992	28.02.2023.
46.	Mr. Abusamad.	20.09.1992	B.A.	20.12.1992.	19.09.2032.
47.	Mr. Amir Zada.	05.01.19967	Metric.	18.01.1993	04.01.2027.
48.	Mr. Sandullah Khan.	11.09.1973	D.Com.	03.03.1993	10.09.2033.
49.	Mr. Sadique Zman.	1.01.1969	M.A.	26.05.1994	11.01.2025.
50.	Mr. Shahidullah Khan.	19.03.1974	Metric.	26.05.1994	18.03.2034
51.	Mr. Rafidullah Khan.	06-04-1972	D.Com.	06.07.1994.	05.04.2032.
52.	Mr. Saadullah Khan II	20.11.1970	M.A.	18.12.1994	19.11.2030.
53.	Mr. Ihsanullah III.	12.04.1975	Metric.	18.12.1994.	11.04.2035.
54.	Mr. Noor Islam Zman.	18.02.1969	M.Sc.	06.10.1996.	17.02.2029.

Surplus Pool
with Lt. No. 7068/BC

Mr. Saad Gul	1	15/1/1967	7/7/1907	14/1/2027
Mr. Ihsanullah	1	5/1/1960	16/2/1907	4/4/2028
Mr. Noor Hajar	1	1959	15/10/1907	23/11/2019
Mr. Abdul Shaker	1	12/7/1960	12/7/1900	11/7/2022
	1	12/7/1970	12/7/1900	11/7/2022

P-2

(11)

SENIORITY LIST OF JUNIOR OFFICERS IN THE OFFICE OF THE DEPUTY COMMISSIONER
BAREILLY AS IT STOOD ON 31.12.1998.

SNo.	NAME OF OFFICIALS	DATE OF BIRTH	EDUCATION QUALIFICATION	DATE OF 1ST APPOINTMENT	DATE OF RETIREMENT
1.	Mr. Nozan Khan ✓	4/10/1955	Metric	6/6/1979	3/10/2015
2.	Mr. Shafiq Riaz ✓	1/9/1956	F.A	19/2/1980	31/8/2016
3.	Mr. Mohammad Yar ✓	15/4/1959	D.Cum	20/2/1980	14/4/2018
4.	Mr. Sadullah Khan ✓	12/4/1960	M.A	20/2/1980	11/4/2020
5.	Mr. Umer Daraz Khan ✓	1/10/1956	F.S.C	1/3/1980	20/9/2016
6.	Mr. Basharat Ali ✓	24/1/1957	B.A	18/3/1980	23/1/2017
7.	Mr. Imtiaz Khan ✓	3/5/1955	P.Sc	7/4/1980	2/5/2015
8.	Mr. Maqbool-ur-Lohman ✓	2/5/1959	F.A	7/4/1980	1/5/2019
9.	Mr. Ali Jan ✓	5/3/1962	Metric	7/4/1980	4/3/2022
10.	Mr. Ghulam Qadir ✓	2/1/1961	F.A	9/4/1980	1/1/2021
11.	Mr. Mohammad Jamil ✓	22/12/1956	B.A/MA	18/5/1980	21/12/2016
12.	Mr. Noor Aleem ✓	1/1/1961	F.A	1/9/1980	31/12/2020
13.	Mr. Zafrullah Khan ✓	14/10/1957	M.A	22/9/1980	13/10/2017
14.	Mr. Rashid Gul ✓	6/6/1961	D.Cum	22/9/1980	5/6/2021
15.	Mr. Mohammad Hanif ✓	11/6/1962	B.A	22/1/1981	10/6/2022
16.	Mr. Aslam Khan ✓	17/11/1954	B.A	21/2/1981	16/11/2014
17.	Mr. Nasib Rehman ✓	27/4/1963	Metric	8/3/1982	26/4/2023
18.	Mr. Abdullah-II ✓	1/4/1957	B.A	18/10/1984	31/3/2017
19.	Mr. Anshor Zad Khan ✓	6/2/1965	Metric	31/12/1984	5/2/2025
20.	Mr. Maqbool Shah ✓	20/4/1959	Metric	1/4/1985	29/4/2019
21.	Mr. Mohammad Riaz ✓	6/3/1961	D.Cum	1/10/1985	5/3/2021
22.	Mr. Asmatullah Khan ✓	5/3/1965	D.Cum	5/10/1985	4/3/2025
23.	Mr. Noor Ali Jan ✓	20/3/1963	B.A	16/10/1985	19/3/2023
24.	Mr. Israr Khan ✓	9/5/1959	D.Cum/B.A	1/2/1986	3/5/2019
25.	Mr. Yaqoob Khan ✓	1/6/1961	D.Cum	1/1/1987	31/5/2021
26.	Mr. Sher Abdullah ✓	29/12/1967	D.Cum	21/4/1988	28/12/2027
27.	Mr. Mohammad Younas ✓	24/4/1964	B.A	24/4/1988	23/4/2024
28.	Mr. Mohammad Qasim ✓	2/4/1966	F.A	6/10/1988	1/4/2026
29.	Mr. Main-ud-Din ✓	5/4/1967	B.A	20/5/1991	4/4/2027
30.	Mr. Ghafar Ali ✓	20/4/1968	D.Cum	20/5/1991	1/4/2028

(P.T.O)

Annex
D

13

OFFICE OF THE DISTRICT COORDINATION OFFICER, BANNU.

NO 8972-76 Estt:

Annex
E

Dated 10/12/2004.

OFFICE ORDER.

In exercise of powers conferred on me by the District Rules of Business and adjustment policy, Mr. Sanaullah Khan Junior Clerk District Surplus Pool Bannu is hereby adjusted as Secretary Union Council Haved Landidak Bannu with immediate effect.

It has also been decided that the above named official shall perform duty in ACO Office (Additional District Nazir Bannu) in addition to his own duties of Secretary Union Council.

-Ed-
District Coordination Officer,
Bannu.

Even No & Date:

1. Copy forwarded to Section Officer (Surplus Pool) Govt: of NWFP Establishment Deptt: Peshawar for information and necessary action. He is requested to please return the Service Book and LPC of the official concerned for necessary action at our end.
2. District Accounts Officer, Bannu.
3. District Nazir of this office.
4. Official concerned.

Amu
Assistant Coordination Officer,
Bannu. W

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پیش
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کا

14

خدمت جناب ڈپٹی کمشنر صاحب ہوں

Annex
F

عنوان: درخواست دربارہ نظر ثانی (Review) آف آرڈر نمبر 76/8972

تاریخ: 10/12/1974 DCC ہوں

صاحب عالی!

RECEIVED
No. 9309
Dt. 05-7
Recd. Date
Revenue Commission Office

گزارش جنکم جوڑم آرڈر نمبر 67/85-6565 تاریخ 15/12/1974

کے تحت بدادر جو بیئر فلک DC آفس ہوں آئینات ہو چکا ہوں اور تاحال DC آفس ہوں مختلف پوسٹوں پر کام کر رہا ہوں۔ یہاں تک کہ

میں مسائل کو ریویو ڈیپارٹمنٹ جوڑم آرڈر نمبر 76/85-8972 تاریخ 10/12/1974 کے تحت برائے عنوان وصولی جو بیئر فلک پوسٹ BPS-05 سے سیکرٹری ویلج کو ارسال کیا گیا اور BPS-06 میں ایک ایئر جسرڈ کرنا تھا جو کہ سرپیسٹریو یا ایئر اور سول سروسز ایکٹ 1973، سیکشن A-11 کے تحت غلط ہے اور اس

آرڈر ہے۔ اس وقت میرا درجہ صرف پر جنکم C-T پوسٹ پر ایئر سٹیشن ہے۔ سیکشن آفیسر سرپیسٹریو پول لیسٹا درجہ کیا گیا تھا۔ واضح احکامات پر ایات کے تحت "That the adjustment against higher post is not permissible under Section-11A of the Civil Servant Act, 1973, and Finance Deptt. instruction Pesh."

درخواست از ایئر نمبر 33/2554 (EAD) 505/Pool No. جوڑم 2/10/74 لف ہے۔ اس بات سے متعلق اور درخواست 2/10/74 جمع رہا ہے۔

میں مسائل تاحال BPS-07 جو بیئر فلک AD آفس ہوں کے عنوان دربارہ کر رہا ہے۔ جو کہ بہتری مسائل BPS-14 کا تعلق ہے۔ یہاں تک کہ کافی متاثر ہو چکا ہے۔ اور میں مسائل کے ساتھ ساتھ ان مسائل میں سے ان مسائل میں سے کسی سے کسی قسم کی کارروائی نہیں ہوئی ہے۔

A&H-EST

الکینڈرا ایچ باری سے عافز انہ استدر عاھکم تعالون کی درجہ میں میرا درخواست پر عمل درآمد کر کے مسائل کو بریادی حق BPS-11/14 کے

کا شکور فرمادیں۔ الشعاران عین نور انشورنگ کمپنی
سرپیسٹریو پول لیسٹا درجہ کیا گیا تھا جو کہ سرپیسٹریو یا ایئر اور سول سروسز ایکٹ 1973، سیکشن A-11 کے تحت غلط ہے اور اس

0334 4073

Handwritten signature

R.K

Handwritten signature

پیش
پر
م

14

Annex
F

خدمت حساب ڈپٹی کمشنر برابھنوں

عنوان: درخواست دربارہ نقل نامی (Review) آف آرڈر نمبر 76/8972

تاریخ: 10/12/2004 DCO برابھنوں

RECEIVED
No. 9309
Dt. 05-7-04
Return Date
Deputy Commissioner Office

حساب عالی!

گزراؤں میں ہیکم بحوالہ آرڈر نمبر 67/85-6565 حرمہ 15/12/1974
کے تحت بطور جوبینر کلرک DC آفس برابھنوں کی خدمات کو چھینا گیا ہے اور تاحال
DC آفس برابھنوں مختلف پوسٹوں پر کام کر رہا ہے۔ یہاں تک کہ اس کے لیے
من سٹائل کو پوسٹ ڈپلومیشن بحوالہ آرڈر نمبر 76/85-8972 حرمہ 10/12/2004
کے تحت برائے تھوڑا دھرمی جوبینر کلرک پوسٹ BPS-05 سے سیکرٹری
ویلیج کو منتقل کیا گیا ہے اور آرڈر نمبر BPS-06 کے تحت اسے جوبینر کلرک پوسٹ
اور برابھنوں سرورٹ ایکٹ 1973، سیکشن 11-A کے تحت بندہ اور آرڈر نمبر
اورڈر ہے۔ اس وقت میرا درخواست پر جیکم C.T پوسٹ پر اپنے صحت
کرنے سیکشن آفیسر سرپلس پول نیشن اور بھیجا گیا تھا۔ واضح احکامات
پر آیات کے تحت "That the adjustment against higher post
is not permissible under section-11A of the Civil
Servant Act, 1973, and Finance Deptt. instruction Post."

درخواست / آرڈر نمبر 3-3/2002 NO. 505/Pool (EAD) حرمہ 3/10/2004
لف ہے۔ اس بابت میں میں نے درخواست کی ہے۔

من سٹائل تاحال BPS-07 جوبینر کلرک AD آفس برابھنوں کے متوازی طور
پر ہے۔ جوبینر کلرک پوسٹ BPS-07 کا شمار درجہ اول میں ہے۔ یہاں تک کہ
کامی متاثر ہو چکا ہے۔ اگر میں من سٹائل کے ساتھ جوبینر کلرک
من سٹائل میں سے میں نے درخواستیں دے چکی ہیں۔ لیکن تاحال
میرا درخواست پر افسران بالاترے کسی قسم کی کارروائی نہیں ہوئی ہے

AGSH-ES

الکینڈرا بھاب سے عاجزانہ استدعا ہے کہ قانون کی روشنی میں میرا
درخواست پر عمل درآمد کر کے من سٹائل کو بریادی حق BPS-11/11
کے طور پر منادیں۔

الکینڈرا بھاب
من سٹائل
تاریخ: 10/12/2004
0331-4073

R.K

کامی
11/12/2004



OFFICE OF THE ASSISTANT DIRECTOR
Local Government & Rural Development Department
Bannu

No. 630 /AD/LG & RDD/Bu.

Dated 25/08/2021

15

To

The Deputy Commissioner,
Bannu.

Annex
G

Subject: APPLICATION OF SANA ULLAH KHAN FOR THE REVIEW OF
ORDER NO.8972-76 DATED 10/12/2004-DCO BANNU.

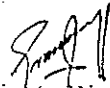
Memo:

Kindly refer to your good office letter bearing No.2319/DC/AE/BC, dated 13/08/2021, on the subject cited above.

After Proper scrutinizing / perusal of the case, reveals that adjustment of the official had already been made against the surplus pool policy which cause financial / promotion loss. Request of the official is based on facts and can easily be accommodated.

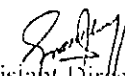
As provided under rules an employee cannot be adjusted on the higher post / scale. In the instant case the official had inadvertently adjusted against higher pay scale i.e Secretary Union Council (BPS-06), which is against the norms of official correspondence and injustice. Therefore proper adjustment of the official will definitely solve the issues once for all.

Therefore, this office fully recommend / support his request to the effect that he may be accommodated in your office as Junior Clerks (BPS-11) with all back benefits, so that he may not suffer more please.


Assistant Director
LG & RDD Bannu

Even No. & Date:-
Copy forwarded to:-

- 1) The Director (Admin/HR) LG & RDD, Khyber Pakhtunkhwa, Peshawar.
- 2) PA to Director General, LG & RDD, Khyber Pakhtunkhwa, Peshawar.


Assistant Director
LG & RDD Bannu

Rf: 14735
25-8-2021



16

THE DEPUTY COMMISSIONER, BANNU

Tel: 0928-9270032, Fax: 0928-9270079, dcbannu

Dated 20/09/2021

No. 3155/DC/AE.

To:

Assistant Director,
Local Govt: & Rural Dev: Deptt: Bannu.

Annex
"H"

Subject: APPLICATION OF SANAULLAH KHAN FOR THE REVIEW OF ORDER
NO.3972-76 DATED 10-12-2004 DCO BANNU.

Memo: Please refer to your office memo No.630/AD/LG&RDD/Bu dated 25-08-2021 on
the subject noted above.

This office thoroughly checked the photo copy of service book as well as other
attached documents that the applicant adjusted as a Secretary Union Council not a Junior
Clerk, but all the entries in service book written as Junior Clerk which is contradiction that
either he is actually Secretary Union Council or adjusted as Junior Clerk.


You are advised to please furnish the cogent reasons and clarified the same and
furnish report within seven days to this office for perusal of Deputy Commissioner Bannu
please.


DEPUTY COMMISSIONER

Even No & Date:

Copy forwarded to:

PS to Deputy Commissioner, Bannu.


DEPUTY COMMISSIONER



17

OFFICE OF THE ASSISTANT DIRECTOR & RURAL DEVELOPMENT AUTHORITY
BANNU

No. /DC/BFC Dated /10/2021

To;
The Deputy Commissioner,
Bannu.

Subject; **APPLICATION OF SANA ULLAH KHAN FOR THE REVIEW OF ORDER NO.8972-76**
DATED 10/12/2004 -DCO BANNU.

Memo,

Reference letter No.3155/DC/AE dated 22/09/2021, on the subject cited above.

As already intimated that the adjustment of the official against the post of Secretary Union Council was contrary to the adjustment policy as he was basically Junior Clerk in BPS-05 and could not be adjusted as Secretary Union Council in BPS-06. However, his adjustment as Secretary Union Council was ordered purely for the administrative purpose.

It is therefore requested that office order No.8972-76/Estab; dated 10/12/2004 (copy enclosed) may please be corrected through necessary corrigendum to the effect that the official be considered adjusted as Junior Clerk in Local Govt: department against the available vacancy since 2004, against which he is drawing salary from the mentioned year.

Assistant Director Local Govt:&
Rural Development Authority Bannu

Annex
I

18

To;

The Assistant Director,
Local Government & Rural Development Bannu.

Annex
F

Subject; DEPARTMENTAL CADRE ADJUSTMENT

With due respect it is stated that I was initially appointed as Junior Clerk in the Deputy Commissioner Office Bannu. As it is revealed by appointed letter. But unfortunately, I was surplus and adjusted in Local Government Department Bannu, and placed as Junior Clerk. Later on as per documentar adjustment I was ordered to work as Secretary Village Council and here lies the adjustment fault. Since then I have been suffering from mental torture and agony, due to which I can neither constrate on my official work nor live relaxed social life.

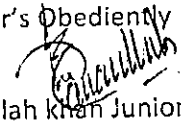
In view of the above injustice and departmental mistake, you are humbly requested to issue order to correct the mistake and update my service record.

Dated.18/08/2022

Enclosed relevant documents for perusal.

1. Copy of initial appointment.
2. Posting order.
3. Copy of adjustment order.
4. DCA remarks on arrear bill.
5. SO Surplus Poll remarks on application.
6. P-30 and pay slips.
7. Copy of Civil Servant Rule.
8. Copy of Service Book.
9. Copy of Letter No.630/AD/LG dt;25/08/2021.

Your's Obediently


Sana ullah Khan Junior Clerk
Deputy Commissioner Office Bannu.

To;

The Assistant Director,
Local Government & Rural Development Bannu.

Subject: **DEPARTMENTAL CADRE ADJUSTMENT**

With due respect it is stated that I was initially appointed as Junior Clerk in the Deputy Commissioner Office Bannu. As it is revealed by appointed letter. But unfortunately, I was surplus and adjusted in Local Government Department Bannu, and placed as Junior Clerk. Later on as per documental adjustment was ordered to work as Secretary Village Council and here lies the adjustment fault. Since then I have been suffering from mental torture and agony, due to which I can neither constrate on my official work nor live relaxed social life.

In view of the above injustice and departmental mistake, you are humbly requested to issue order to correct the mistake and update my service record.

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1. Copy of initial appointment.
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5. SO Surplus Poll remarks on application.
6. P-30 and pay slips.
7. Copy of Civil Servant Rule.
8. Copy of Service Book.
9. Copy of Letter No.630/AD/LG dt: 25/08/2021.

Your's Obediently

Signature in English

Sana Ullah Khan Junior Clerk
Deputy Commissioner Office Bannu

Reminder-1



19

THE DEPUTY COMMISSIONER, BANNU

Tel: 0928-9270032, Fax: 0928-9270079

No. 2789/DC/AE/F-9

Dated: - 24/11/2022

To

The Assistant Director LG & RDD,
Bannu.

Subject: APPLICATION OF SANULLAH KHAN FOR THE REVIEW OF ORDER NO.8972-76
DATED 10.12.2004 DCO BANNU.

Memo:

Please refer to this office letter No:3155/DC/AE Dated 11.04.2022 on the subject
noted above.

The reply is still awaited from your end, please expedite the same without
further delay.

Even NO & Date:

Copy forwarded to: -

Ps to Deputy commissioner Bannu for information

B
23/11/2022
/DEPUTY COMMISSIONER
HW

B
23/11/2022
/DEPUTY COMMISSIONER
HW

Reminder-I

THE DEPUTY COMMISSIONER, BANNU

Tel: 0928-9270032, Fax: 09270079

No.2789/DC/AE/F-9

Dated 24/11/2022

To

The Assistant Director LG & RDD.

Bannu

Subject: APPLICATION OF SANAULLAH KHAN FOR THE REVIEW OF
ORDER NO.8972-76 DATED 10.12.2004 DCO BANNU

Memo

Please refer to this officer letter No.3155/DC/AE Dated 11.04.2022
on the subject noted above.

The reply is still awaited from your end, please expedite the same
without further delay.

Signature in English

23.11.022

DEPUTY COMMISSIONER

Even No. & Date:

Copy forwarded to :-

Ps to Deputy commissioner Bannu for information.

Signature in English

23.11.022

DEPUTY COMMISSIONER

20

FORM PA 102

No vacant post
Gr. UC in procedure
BU6349 please see enclosure

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

OFFICE OF THE Assistant Director Local Government & R.D. Banawal

FOR THE MONTH OF June 2022 120.

DDO Code (Cost Center) BU 6 3 4 9 Description

Personal Number 0 1 7 9 4 3 4 Employee Name

Employee Name Mrs. SANA ULLAH KHAN

National ID Card Number 1101-9828170-3

Grade (Pay Scale Group) 11 Senior Socy. UC

Salary Status 12 Start Stop

186
1829
919
10126
1220
3252
3576

09/12/22

GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS				Effective Date	Remarks
Field No	New Contents	Wage Type	Amount	Part	Part		
	Pay	0001	31930 - PM	Revised above daily side-lined			
	HRA	1000	2778				in line with the Remarks list
	C.A.	1210	2856	As is evident from Finance Dept.			
	AR 17	2220	3193	Notification No SA (RD) / FD / R-5 / 2018 / 1000			The official concerned has been
	AR 18	2247	3193	Eqn / 3379 dt 1-2-2018. The official			appointed as Jr. Clerk BPS in
	AR 19	2264	3193	has been awarded BPS-11 through the			13.06.1994. His appointment as
	AR 21	2309	3193	bill may be honored please.			Willops body is illegal as the
	AR DRA	2351	4289				Post of Willops body is not of the
	Adj Pay + Allow	5801	(+) 168603				Grade in which the official

Assistant Director
Local Govt & Rural Development
Department District Banawal

District Controller of Accounts
Banawal

Prepaid By

Audited/Checked By

of this post is increased. It is done
& closed. Entered/Verified By
A.D. G. S. S.

Mr. Sanaullah Khan on promotion Senior Secretary Union Council BPS-11
Arrear of Pay and Allowances on promotion Senior Secretary Union Council w.e.from 01-02-2018 to 31-05-2022

PERIOD		PAY DUE	PAY DRAWN	Difference	TOTAL
FROM	TO				
01-02-2018	30-11-2018	28410	27460 ✓	950 x 10	9500
01-12-2018	30-11-2019	29290	28070 ✓	1220 x 12	14640
01-12-2019	30-11-2020	30170	28680 ✓	1490 x 12	17880
01-12-2020	30-11-2021	31050	29290 ✓	1760 x 12	21120
01-12-2021	31-05-2022	31930	29290 ✓	2640 x 6	15840
Pay Total					78980
AR 2017 10%					
01-02-2018	30-11-2018	2841	2746	95 x 10	950
01-12-2018	30-11-2019	2929	2807	122 x 12	1464
01-12-2019	30-11-2020	3017	2868	149 x 12	1788
01-12-2020	30-11-2021	3105	2929	176 x 12	2112
01-12-2021	31-05-2022	3193	2929	264 x 6	1584
AR 2018 10%					
01-07-2018	30-11-2018	2841	2746	95 x 5	475
01-12-2018	30-11-2019	2929	2807	122 x 12	1464
01-12-2019	30-11-2020	3017	2868	149 x 12	1788
01-12-2020	30-11-2021	3105	2929	176 x 12	2112
01-12-2021	31-05-2022	3193	2929	264 x 6	1584
AR 2019 10%					
01-07-2019	30-11-2019	2929	2807	122 x 5	610
01-12-2019	30-11-2020	3017	2868	149 x 12	1788
01-12-2020	30-11-2021	3105	2929	176 x 12	2112
01-12-2021	31-01-2022	3193	2929	264 x 6	1584
AR 2021 10%					
01-07-2021	31-05-2022	3193	2929	264 x 11	2904
House Rent Allowance					
01-02-2018	31-05-2022	1852	1543	309 x 52	16068
Convince Allowance					
01-02-2018	31-05-2022	2856	1932	924 x 52	48048
DRA 15%					
01-03-2022	31-05-2022	4789	4393	396 x 3	1188
Allowances Total					89623
Grant Total.					168603/-

Assistant Director LS & ADD

Bannu

10/05/2022

PAYROLL SYSTEM
 AMENDMENT FORM
 SINGLE EMPLOYEE ENTRY

720
 15/06/2022

21

FORM: PAY02
 Date¹
 Page No²

OFFICE OF THE Assistant Director Local Government, RDD Banna.
 FOR THE MONTH OF June 2022 /20.

DDO Code⁵ (Cost Center) BU6349 Description⁶

Personal Number⁷ 0179434 Employee Name⁸

MR. SANULLA KHAN.

National ID Card Number⁹ 11101-9828170-3

Grade (Pay Scale Group)¹⁰ 11 Senior Secy Ue

Salary Status¹² Start Stop

GENERAL DATA CHANGE ¹³			CHANGE IN PAYMENTS / DEDUCTIONS ¹⁷				Effective Date ²¹	Remarks ²²
Field ID ¹⁴	Field ID ¹⁵	New Contents ¹⁶	Wage Type ¹⁸	Rupees ¹⁹	Amount	Change		
		Pay	2201-	31930	PM	✓		
		HRA	1000	2778	"	✓		
		CA	1210	2856	"	✓		
		AR17	2224	3193	"	✓		
		18	2247	3193	"	✓		
		19	2264	3193	"	✓		
		21	2309	3193	"	✓		
		DRA	2351	4789	"	✓		
		Adj Pay+	5801-	(+) 168603		✓		

720
 15/6/22

Area = 168603/-

dd NID 155-9241639
 ONIC 11101-9828170-3
 BPSII Sr Secy Union Banul

1-6-2022 Promoted as Sr Secy U.e LG RDD Banna vide No - dt 1-2-018

Prepaid By [Signature]

Audited/Checked By [Signature]

Entered/Verified By [Signature]

Mr. Sanaullah Khan on promotion Senior Secretary Union Council BPS-11
Arrear of Pay and Allowances on promotion Senior Secretary Union Council w.e from 01-02-2018 to 31-05-2022

PERIOD		PAY DUE	PAY DRAWN	Difference	TOTAL
FROM	TO				
01-02-2018	30-11-2018	28410	27460	950 x 10	9500
01-12-2018	30-11-2019	29290	28070	1220 x 12	14640
01-12-2019	30-11-2020	30170	28680	1490 x 12	17880
01-12-2020	30-11-2021	31050	29290	1760 x 12	21120
01-12-2021	31-05-2022	31930	29290	2640 x 6	15840
Pay Total					78980
AR 2017 10%					
01-02-2018	30-11-2018	2841	2746	95 x 10	950
01-12-2018	30-11-2019	2929	2807	122 x 12	1464
01-12-2019	30-11-2020	3017	2868	149 x 12	1788
01-12-2020	30-11-2021	3105	2929	176 x 12	2112
01-12-2021	31-05-2022	3193	2929	264 x 6	1584
AR 2018 10%					
01-07-2018	30-11-2018	2841	2746	95 x 5	475
01-12-2018	30-11-2019	2929	2807	122 x 12	1464
01-12-2019	30-11-2020	3017	2868	149 x 12	1788
01-12-2020	30-11-2021	3105	2929	176 x 12	2112
01-12-2021	31-05-2022	3193	2929	264 x 6	1584
AR 2019 10%					
01-07-2019	30-11-2019	2929	2807	122 x 5	610
01-12-2019	30-11-2020	3017	2868	149 x 12	1788
01-12-2020	30-11-2021	3105	2929	176 x 12	2112
01-12-2021	31-01-2022	3193	2929	264 x 6	1584
AR 2021 10%					
01-07-2021	31-05-2022	3193	2929	264 x 11	2904
House Rent Allowance					
01-02-2018	31-05-2022	1852	1543	309 x 52	16068
Convince Allowance					
01-02-2018	31-05-2022	2856	1932	924 x 52	48048
DRA 15%					
01-03-2022	31-05-2022	4789	4393	396 x 3	1188
Allowances Total					89623
Grant Total.					168603/-

Assistant Director LG & RDD

Bannu
 Local Government
 Bannu District, Balochistan

PAYROLL SYSTEM
 AMENDMENT FORM (PAYMENTS/DEDUCTIONS)

DDO Code: **BV-6349**
 Sub-DDO Code: **-**
 Assistant Director LS & RDD Branch




FORM: PAY 3
 Date: **29**
 Page: **1**

Personnel No. / Card Number	National ID	Name	Detailed Duty / Function Code	112 AMV	BPT-11 BPS-11	ADD	Notes
00179434		Schmitt, Alan Senior Clerks	BPT-11 Level 23	0001	31930/-	5801 (4) 157672/-	Updated from BPT-11 to BPT-11 w/e/d. 20-5-2014
				1000	1858/-	5002 (4) 15292/-	BPT-11 w/e/d. 20-5-2014
				1210	2856/-	5011 (4) 68734/-	BPT-11 w/e/d. 20-5-2014
				2148	721/-	5309 (6) 5726/-	Connected & Approved by pay roll w/e/d. 20-5-2015
				2199	481/-	5964 (4) 3127/-	631-7-2020 (12/31/2020) 24 months pay the adjusted in next pay roll for 08/2020.
				2211	2457/-	5975 (4) 10126/-	
				2224	3193/-	5990 (4) 10148/-	
				2247	3193/-	5332 (4) 7531/-	
				2264	3193/-	5336 (4) 4090/-	
						283056/-	

Verified that to whom AMV claimed in the BPT has not been provided pay for the period. See in the BPT Manual. Pay roll w/e/d. 20-5-2014. 31-7-2020 pay has been shown normally.

Notes: 1. All adjustments to be entered with a '+' or '-' sign. All payments to be entered with a '+' sign and all deductions with a '-' sign. All adjustments to be added to the salary for adjustment period. 2. All adjustments to be entered with a '+' or '-' sign. All payments to be entered with a '+' sign and all deductions with a '-' sign. All adjustments to be added to the salary for adjustment period.

Prepared By: _____
 Page Total: _____
 Audited/Checked By: _____
 Entered/Verified By: _____

61442	  
ایڈوکیٹ: محمد طارق	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
بار کونسل / ایسوسی ایشن نمبر: DC-11-1564	
رابطہ نمبر: 333-5385283	

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بعدالت جناب: خیبر پختونخواہ ایسوسی ایشن ٹریڈ مارک لیسٹڈ

مخاطب: سائل	دعویٰ:
ثناء اللہ خان بنام ڈبئی ٹرانس کنکشنز پرائیویٹ وغیرہ	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام لیسٹڈ کے لیے محمد طارق (ایڈووکیٹ) سہریم کورٹ کو وکیل مقرر کیا گیا 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 وکیل صاحب کو اختیار دیا تاکہ سند رہے

Acceptance
 Tahir

المرقوم:

الع ہد گواہ شد الع ہد

مقام پشاور کے لیے منظور ہے۔

Amrullah
 ثناء اللہ خان (P)