

BEFORE THE HON'BLE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

1086/2023

Shaheena BegumAppellant.

Vs

Government of KPK through Secretary Higher Education and others,

... Respondents

I N D E X

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|-----|--|-------|------|
| 1. | Memo of service appeal affidavit ,address of parties | | 1-5 |
| 2. | Copy of qualification | A'' | 6-10 |
| 3. | Copy of Pay Slip | B'' | 11 |
| 4. | Copy of CNIC of Appellant | C'' | 12 |
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Dated :08/05/2023



APPELLANT

Shaheena Begum


THROUGH CONSEL

MASOOD UR REHAMN ADVOCATE

HIGH COURT BANNU

&

Aftab Afridi Advocate High Court



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BEFORE THE HON'BLE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

SERVICE APPEAL NO 1086/2023

Shaheena Begum D/O Mir Payo Jan lecturer at Government Degree College
for Women Kakki District Bannu ~~~~~ Appellant.

VS

1. Government of KPK Through Secretary Higher Education.
2. Principle Government Degree College for Women Kakki District Bannu.
3. Account General KPK Peshawar .
4. District Account Officer Bannu.
5. Manager NADRA District Bannu(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 WHERE BY
PETITIONER IS DENIED FOR CORRECTION DATE OF
BIRTH 15/03/1984 INSTEAD OF 15/03/1979 WHICH IS
RECORDED BY THE RESPONDENTS IN THE SERVICE
RECORD OF APPELLANT .

PRYAER :

ON ACCEPTANCE OF INSTANT SERVICE APPEAL AND
CORRECTION OF DATE OF BIRTH AS 15/03/1984 AS
MENTIONED IN HER ACADEMIC QUALIFICATION AS

WELL AS CNIC AND TO RECORD 15/03/1984 INSTEAD OF
15/03/1979 AND DELETION OF 15/03/1979

Respectfully Sheweth :-

1. That appellant is belong to District Bannu having qualification of Master degree holder appointed in the respondents department as Teaching assistant later on her service was regularized through regularization Act 2017 of college Assistance and her date of birth is recorded as 15/03/1979. (copy of the qualification, pay slip are annexed as annexure A & B").
2. That appellant and her brother Shamsheer Ali Khan has un natural gap between their ages as in NADRA her brother date of birth is recorded as a 01/01/1979 while appellant is 15/03/1979. It is important to mentioned that her brother is also Civil Servant . (Copy of the CNIC is annexed as annexure C & D").
3. That when Appellant CNIC is blocked by Respondent No. 5 and thus come wrong entry in her knowledge in service record respondents department has recorded Appellant age as 13/05/1979 which is wrong and there is un natural gap between the Appellant and her brother Shamsheer Ali for which Appellant filed departmental Appeal which is un decided and relief is not given by the Respondents department which is in their domain. (Copy of service appeal and registry receipt are annexed as annexure E & F ").
4. That having no other officious remedy for relief the petitioner invokes the jurisdiction of this Hon'ble Service Tribunal for redressed of his

grievance which is relates to his terms and condition of his service inter alia on the following grounds :

GROUNDS:-

- A. That Appellant is not treated according to law rules and regulations on the subject as Appellant case is fall in un natural gap due to which Appellant is suffering.
- B. That Appellant has vested right for correction of her age due to in service record NADRA policy for issuing CNIC.
- C. That issue relate to term and conditions of appellant due to wrong enteries Appellant suffer irreparable and respondents department under legal obligation to correct enteries recorded by Respondents department.
- D. That from correction of date of birth Appellant valueable right promotion seniority relates having no other remedy accept present service appeal hence correction date of birth is necessary for the bright future of the appellant other ground will be taken at the time of arguments.

Dated :08/05/2023


APPELLANT

Shaheena Begum

THROUGH CONSEL


MASOOD UR REHAMN ADVOCATE

HIGH COURT BANNU

 &
Aftab Afridi Advocate High Court

() (4)

BEFORE THE HON'BLE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

SERVICE APPEAL NO /2023

Shaheena BegumAppellant

Vs

Government of KPK through Secretary Higher Education and others

...Respondents

AFFIDAVIT :-

I Shaheena Begum D/O Mir Payo Jan lecturer at Government Degree College for Women Kakki District Bannu, do here by solemnly affirm and declare on oath that contents of above service is true and correct and nothing has been concealed from this Hon'ble Tribunal.

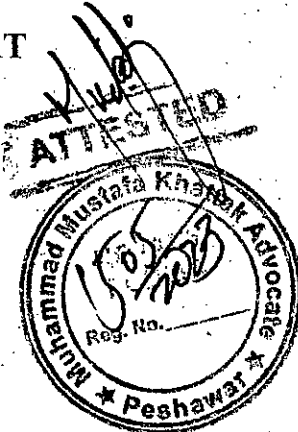
Sh
DEPENDENT

SHAHEENA BEGUM

11707-1418226-2

Identified by :

Masood
MASOOD UR REHMAN WAZIR
ADVOCATE HIGH COURT



5

BEFORE THE HON'BLE TRIBUNAL KHYBER PAKHTUNKIWA
PESHAWAR

SERVICE APPEAL NO /2023

Shaheena BegumAppellant

Vs

Government of KPK through Secretary Higher Education and others

... Respondents

MEMO OF ADDRESS OF PARTIES :-

Shaheena Begum D/O Mir Payo Jan lecturer at Government Degree College
for Women Kakki District BannuAppellant.

VS

1. Government of KPK Through Secretary Higher Education.
2. Principle Government Degree College for Women Kakki District Bannu.
3. Account General KPK Peshawar .
4. District Account Officer Bannu.
5. Manager NADRA District Bannu.....(Respondents)


Dated :08/05/2023


APPELLANT

Shaheena Begum

THROUGH CONSEL


MASOOD UR REHAMN ADVOCATE
HIGH COURT BANNU

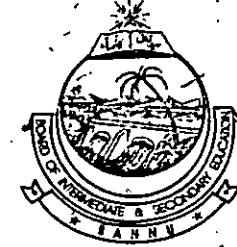
 &
Aftab Afridi Advocate High Court

S.No. 9769

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 20020

Board of Intermediate and Secondary Education
Bannu N-W.F.P., (Pakistan)



INTERMEDIATE EXAMINATION

SESSION 2002 (Annual)
Humanities Group

This is to Certify that SHAHEENA BEGUM

Daughter of MIR PIYO JAN

Student of DISTRICT BANNU.

Registration No. 222011003686 has passed the *Intermediate Examination* of the

Board of Intermediate & Secondary Education, Bannu held in MAY, 2002 as a **PRIVATE** candidate

She obtained 497 marks out of 1100 and has been placed in Grade D Representing FAIR.

Date of declaration of Result: 31-08-2002

Prepared on: JANUARY 30, 2006

Munser
Assistant Secretary

SECRETARY
SECRETARY

THIS CERTIFICATE IS ISSUED WITHOUT ALTERATION OR ERASURE

7

Serial No. GU 014424

8

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN



etc

(Session 2007)
ANNUAL

SHANEEMA BEGUM DAUGHTER of MIR PIYO JAN

and a student of BANNU, DISTRICT

having passed the prescribed examination in JUNE/JULY 20 07

is this day admitted by the GOMAL UNIVERSITY to the DEGREE o

BACHELOR OF ARTS

in the SECOND Division SHE Passed also in as an

~~Additional Optional Subject~~ / Pakistan Studies and Islamiyat as Compulsory Subjects

The Examination was taken as a whole / in parts.

Registered No. 2752-GOMAL-05

Roll No. 8331

Result declared on SEPTEMBER 11, 2007

Countersigned

9

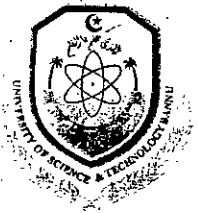
Serial No. 01,607

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

CTC

University of Science & Technology Bannu

R.W.F.P.



Pakistan



Provisional Certificate

Session 2007-2009

This is to certify that Mr./Miss. Shaheena Begum S/D of Mir Payo Jan

a Student of Private Candidate

has passed MA Urdu (Annual) (Master in Urdu (Annual)) Examination

held in October, 2009. He/She was placed in 3rd Division/Grade/GPA securing 482 marks out of 1100

The Examination was taken as a whole / in parts As a Whole

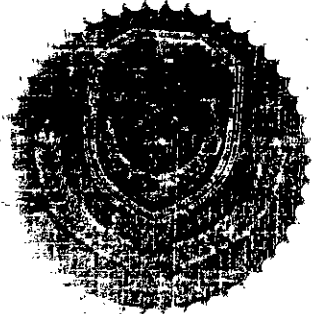
Roll No. 6175

Reg. No. 2007-UB-BP-13486

Issue Date 12-03-2010

Prepared by : _____

Checked by : _____



(Signature)

Controller of Examinations

10

DOMICILE CERTIFICATE

CTC
[Handwritten signature]

I declare that I am born of parents, who are permanently domiciled in North West Frontier Province having been born / settled in this Province.

I was born at BAZAR AHMAD KHAN TEH: & DISTT: BANNU.

Signature *Shahena Begum*
Resident of BAZAR AHMAD KHAN
Tehsil & District Bannu.

Date 19 / 8 / 1997



In pursuance to the declaration dated 19 / 8 / 1997 by Mr. M. S. SHAHEENA BEGUM S/D of MIR PAIQ JAN to the effect that he has been born of parents who are permanently domiciled in North West Frontier Province, it is hereby certified that the said MISS SHAHEENA BEGUM is born of parents who are permanent resident of the North West Frontier Province having been born / settled within it.

I have satisfied myself from my own knowledge/ verification through Tehsildar Bannu that the above declaration is true and certify accordingly.

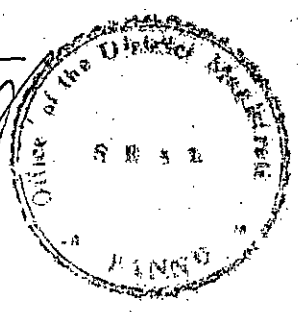
Given under my hand and the seal of the court this 19th day of August 1997

[Signature]
Magistrate 1st class, Bannu.
Name A. B. ...
WTC 4B

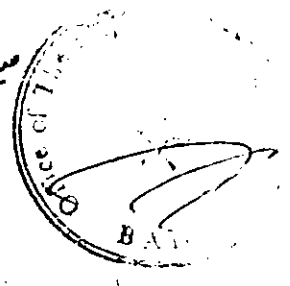
No 2569 /HC. dated 19 AUG 1997 /199

COUNTERSIGNED

[Signature]
District Magistrate, Bannu.



میں تعجب تو کرتا ہوں کہ... ہندو سیم درخت جیروا... ہندو سیم درخت اور اسے
 والدین حوض باہر اور ان کے قریب وضع ہونے کے متعلق ریاستی و پیدائشی اور کونسی
 باشندگان ہیں۔ اور ایف۔ آر۔ عہدہ کوئی تفسیر نہیں رکھتا ہے بلکہ جسکی
 ذاتی طور پر جاننا ہوں۔



تو میں کبھی خود ماہی شکاری نہیں گیا۔ دھرم سیم درخت اور جان بھادت خود
 لیدر ایک والدین حوض باہر اور ان کے قریب وضع ہونے کے متعلق
 ریاستی و پیدائشی باشندگان سے لیدر ایف۔ آر۔ عہدہ کوئی تفسیر نہیں

(علی احمد)

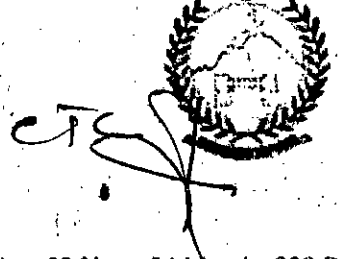
۱۹/۸/۹۷

مستند...

...

Government of Khyber Pakhtunkhwa
District Accounts Office Bannu
Monthly Salary Statement (March-2023)

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Personal Information of Miss SHAHEENA BEGUM d/w/s of MIR PIO JAN

Personnel Number: 00730727 CNIC: 1110114182262 NTN:
 Date of Birth: 15.03.1979 Entry into Govt. Service: 05.11.2014 Length of Service: 08 Years 04 Months 028 Days

Employment Category: Active Temporary

Designation: ASSISTANT PROFESSOR 80000818-GOVERNMENT OF KHYBER PAKH

DDO Code: BU5126-Government Girls Degree College Kakki Bannu

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: EDU CP V.13 P32 Interest Applied: Yes **GPF Balance: 149,322.00**

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 17 Pay Stage: 5

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|---------------------------|----------|
| 0001 | Basic Pay | 62,170.00 | 1001 | House Rent Allowance 45% | 6,650.00 |
| 1210 | Convey Allowance 2005 | 5,000.00 | 1974 | Medical Allowance 2011 | 1,846.00 |
| 2148 | 15% Adhoc Relief All-2013 | 848.00 | 2199 | Adhoc Relief Allow @ 10% | 424.00 |
| 2316 | Teaching Allowance 2021 | 6,074.00 | 2341 | Dispr. Red All 15% 2022KP | 5,936.00 |
| 2347 | Adhoc Rel At 15% 22(PS17) | 5,936.00 | | | 0.00 |

Deductions - General

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|-------------------|-----------|
| 3017 | GPF Subscription | -4,270.00 | 3501 | Benevolent Fund | -1,500.00 |
| 3534 | R. Ben & Death Comp Fresh | -900.00 | 3609 | Income Tax | -841.00 |
| 3666 | Turkiy/Syria EQ Ded KPK | -2,584.00 | 3990 | Emp.Edu. Fund KPK | -270.00 |

Deductions - Loans and Advances

| Loan | Description | Principal amount | Deduction | Balance |
|------|---------------------------|------------------|-----------|------------|
| 6505 | GPF Loan Principal Instal | 200,000.00 | -7,000.00 | 186,000.00 |

Deductions - Income Tax

Payable: 13,037.68 Recovered till March-2023: 7,256.00 Exempted: 3259.28 Recoverable: 2,522.40

Gross Pay (Rs.): 94,884.00 Deductions: (Rs.): -17,365.00 Net Pay: (Rs.): 77,519.00

Payee Name: SHAHEENA BEGUM

Account Number: 0202787264

Bank Details: UNITED BANK LIMITED, 210306 PREEDY GATE PREEDY GATE, BANNU

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: ~~Bannu~~ Bannu

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City: -Bannu

Email:

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etc

حکومت پاکستان
قومی شناختی کارڈ
11101-1418226-2



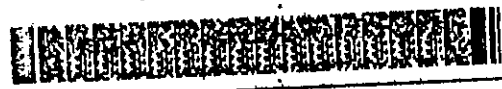
نام: شایبہ بیگم
جنس: عورت
والد کا نام: سید یحیٰی خان
شناختی ادارت: کوئی نہیں
عثمان یوسف بیگ
پہنچ پیدائش: 15/03/1984
دستخط: مشرورہ بیگم

دستخط: مہمان

شناختی نمبر: 11101-1418226-2
نام: شایبہ بیگم
TC2629



تاریخ: 19/06/2018
تاریخ: 19/06/2028
کے تحت جاری شدہ ہے۔



(13)

etc

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Shauqsher Ali Khan**

Father Name: **Mir Ghayoor Jao**

Gender: **M** Country of Stay: **Pakistan**

Identity Number: **11101-6807164-7** Date of Birth: **01.01.1979**

Date of Issue: **26.11.2019** Date of Expiry: **26.11.2029**

Holder's Signature

11101-6807164-7

101101301454
755-79-456524

Shauqsher Ali Khan
 Register General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں

خدمت ضابط میٹروی اپٹرا پوکس KPK بشاد

CC
[Signature]

عنوان :- محکمہ اہل برائے لکھنؤ پورہ چائیسروس
ریکارڈ میں غلط امری تاد - 15/3/79
کی لکھنؤ کر کے 15/3/84 تک

ضابط عالی سے ایل ذیل عرض کرتی ہے

۱- یہ کہ سٹیج کی توہری سٹینڈ اسٹنٹ ہوئی تھی اور میں ایٹک کی رو سے ریگولر ہوئی (تیل نوٹ ہے)

۲- یہ کہ سٹیج کا تاد 15/3/79 میں پورائش 15/3/79 کو انٹیشن آمد سے قبلت میں تھا (تیل نوٹ ہے)

۳- یہ کہ سٹیج کا تاد براہ جہت سے سٹوڈنٹ می جوبن وہ بھی سرکاری ممبر ہے کی تاد 15/3/79 میں پورائش 15/3/79 کو انٹیشن آمد سے قبلت میں تھا (تیل نوٹ ہے) Un National
۴- یہ کہ سٹیج کا تاد 15/3/79 میں پورائش 15/3/79 کو انٹیشن آمد سے قبلت میں تھا (تیل نوٹ ہے) Un National
۵- یہ کہ سٹیج کا تاد 15/3/79 میں پورائش 15/3/79 کو انٹیشن آمد سے قبلت میں تھا (تیل نوٹ ہے) Un National

۶- یہ کہ سٹیج کی Physicist میں 15/3/79 میں پورائش 15/3/79 کو انٹیشن آمد سے قبلت میں تھا (تیل نوٹ ہے) Un National

لہذا استدعا ہے کہ سٹیج کی پورائش میں لکھنؤ
کر کے 15/3/79 میں پورائش 15/3/79 کو انٹیشن آمد سے قبلت میں تھا (تیل نوٹ ہے) Un National
30/11/23
شاہینہ بیگم میٹرو پورہ

15

No. 1293

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Rs. Ps.

80

Received a registered letter addressed to _____

Date-Stamp _____

Initials of Receiving Office _____
*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____ (in words) _____

If insured.

Insurance fee Rs. _____ Ps. _____ (in words) } Weight } 30 gms
Kilo
Grams

Name and address of sender } _____

وکالت نامہ

قیمتی

قیمتی

بعدالت عالیہ پشاور ہائی کورٹ بنوں بیچ بنوں

مقام: نام: سکریٹری انٹرنیشنل کپڑے

منجانب: عنوان مقدمہ: رٹ پیشکش انجمن ترقی تعلیم اور کھیلوں کے امور

باعث تحریر آنکھ

مقدمہ مندرجہ بالا ہم اپنی طرف سے واسطے بیروہ و جوابدہی اور دیگر عمل کارروائی کیلئے برائے

مقام: مسجود الرحمن ڈاٹ کام

کو وکیل مقرر کر کے اختیار دیتے ہیں کہ میری اجاری جناب سے مقدمہ مذکورہ کی بیروہ و جوابدہی کرے۔ راضی نامہ کرے، فیصلہ ثالثی کرانے کے فیصلہ کرانے پر حلف منظور کرے ہر قسم کا بیان دیوے۔ ہر قسم کے سوال و جواب کرے، عرضی دعویٰ کرے جواب دعویٰ، اپیل جو اب جواب، عذرات، گمرانی، نظر ثانی، درخواست ہائے متفرق اور دیگر ہر قسم دستاویزات تحریر و تصدیق کر کے داخل کرے، واپس لیوے، دست برداری کرے، ترمیم کرے، ہر قسم رقوم مقدمہ، جرمانہ، ہرجانہ داخل اور وصول کرے، ہر قسم دستاویز جو بعدم بیروہ ڈیس ہو سربرز کرے، کارروائی، ڈگری یکطرفہ منسوخ کرے۔ اجراء ڈگری کرے۔ زر ڈگری وصول کرے۔ قبضہ جائیداد لیوے دیوے۔ اپنے ہمراہ ایڈوکیٹ بیرسٹر یا محکمہ قانون برائے جزیوی یا کل کارروائی مقرر کرے علیحدہ کرے۔ دوران مقدمہ اگر جرمانہ، ہرجانہ فریق مخالف سے وصول ہو، وہ حق وکیل صاحب کا ہوگا۔ اگر پیشی ایسے مقام پر ہو جو صدر مقام سے دور ہو تو وکیل صاحب بیروہ کے ذمہ دار نہ ہوئے۔ اس سلسلے میں جملہ ساختہ و برداشت وکیل صاحب موصوف منظور و قبول ہوگا۔ لہذا وکالت نامہ ہذا لکھ دیا کہ سند رہے۔ نیز وکیل موصوف کو میری جانب سے مقدمہ فوجداری و مال میں بھی مکمل کارروائی کرنے کا مکمل اختیار با مضمون بالا حاصل ہوگا۔

Attested:.....

مورخہ: ماہ: 2023ء

مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے

.....

.....

BC-09-1828

.....

.....

.....
HUSSAIN
High Court
64-11-1570

03339740590

ملنے کا پتہ: رفعت A ماسیکر و نوٹو سٹیٹ شاپ پشاور ہائی کورٹ بنوں بیچ بنوں

Mob: 0334-8854209 / 0315-0191876