

21<sup>st</sup> Feb, 2023

Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment. Last chance is given to the appellant to argue the case on the next date. To come up on 27.04.2023 before S.B at camp court Abbottabad.



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

27<sup>th</sup> April, 2023

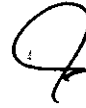
1. Register
2. Learned counsel for the appellant present.
3. The office has reported that the appeal was returned to the learned counsel for the appellant on 18.04.2022 for completion and resubmission within fifteen days but the appeal was re-filed on 24.08.2023 i.e after 112 days and that too without removal of objections. Learned counsel for the appellant submits that it was a financial matter and no limitation ran. Let pre-admission notice be given to the other side to file reply also responding the late/ resubmission of file on or before 20.06.2023 before S.B at camp court Abbottabad. The appellant shall deposit the expenses of TCS for summoning of respondent No.6. P.P given to the parties.



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

22<sup>nd</sup> Nov, 2022

This case was directed to be fixed before camp court Abbottabad for 16.11.2022 but the Reader has neither placed these appeals nor brought in the cause list. Explanation of the Reader be called as to why he should not be proceeded under the relevant Law. His explanation should reach my table within three days. The matter be posted on 14.12.2022 before S.B at camp court Abbottabad. Notices be issued to the petitioner and his counsel through ordinary means as well as through Whatsap of the counsel.



(Kalim Arshad Khan)  
Chairman

14<sup>th</sup> Dec 2022

Clerk of learned counsel for the appellant present.

Counsel are on strike. To come up for preliminary hearing on 21.02.2023 before S.B at camp court Abbottabad.

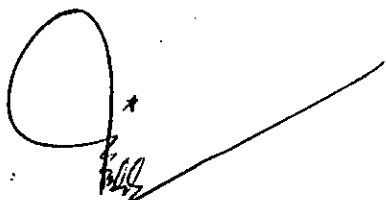


(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

26.09.2022

Nemo for the appellant.


Notice be issued to the appellant and his counsel to attend the court on the next date. Adjourned. To come up for arguments on office objections before the S.B on 04.11.2022.

  
(Mian Muhammad)  
Member (E)

4<sup>th</sup> Nov, 2022

None for the petitioner present.

Because of strike of the Bar, this matter is adjourned to 16.11.2022 before S.B at camp court Abbottabad. Office is directed to notify the next date on the notice board as well as on the website of this Tribunal.

  
(Kalim Arshad Khan)  
Chairman

Respected Sir,

It is submitted that the present appeal was received on 15.04.2022 after thoroughly scrutinizing the same many deficiencies were found in it which was returned to the counsel for the appellants for completion and resubmission within 15 days which was to be resubmitted on 03-05-2022 but counsel for the appellant re-filed the same on 24.08.2022 late by 112 days without removing objections.

The appeal is submitted to your Honour under rule-7(c) of Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

  
REGISTRAR

24/8/2022


Worthy Chairman

The appeal of Mr. Nisar Ahmad Retired Director Agriculture, District Haripur received today i.e. on 15.04.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of service rules of 1981 mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it. Annexure-B is an act of 2012 but not a service rules.
- 2- Copy of departmental appeal is not attached with a the appeal which may be placed on it.
- 3- Annexure-F of the appeal is illegible which may be replaced by legible/better one.

No. 983 /S.T,

Dt. 18-4- /2022

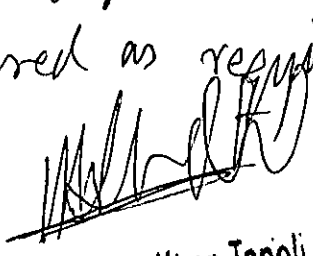
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Arshad Khan Tanoli Adv.  
High Court A.Abad.

Sir,

1- correct Notification / service rules of recruitment are 1983 which are mentioned and placed at Annex "D",

2. Rest of the objections have been cleared as required.

  
Muhammad Arshad Khan Tanoli  
Advocate Supreme Court of Pakistan  
Office # 33 Jinnah Plaza Adjacent to  
Distt. Bar Abbottabad

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST**

Case Title: Nisat Ahmad vs Govt of Pakhtunkhwa & others

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>M. Arshad Khan Tanoli Dir S.C</u>		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on	—	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on	—	
26.	Whether copies of comments/reply/rejoinder submitted? on	—	
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on	—	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

M. Arshad Khan  
Tanoli ASC

Signature:

[Handwritten Signature]

Dated:

20/3/22

0346-9588583

**BEFORE THE CHAINMAN SERVICE TRIBUNAL KP**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2022

Nisar Ahmed (Retired) District Director Agriculture, District Haripur.  
...APPELLANT

**VERSUS**

Govt. of Pakhtunkhwa through Chief Secretary, Peshawar & others.  
....RESPONDENTS

**SERVICE APPEAL**

**INDEX**

<i>S. #</i>	<i>Description</i>	<i>Page #</i>	<i>Annexures</i>
1.	Service appeal alongwith affidavit	1 to 9	
2.	Copy of retirement order of appellant	10	"A"
3.	Copy of relevant rule at time of appointment of the appellant	11-13	"B"
4.	Copy of degree of MSC honour in Agriculture of the appellant	14	"C"
5.	Copy of relevant notification dated 24.08.1983	15-16	"D"
6.	Copy of departmental appeal dated 28.09.2020 along with covering letter dated 28.09.2020	17	"E"
7.	Copies of notification dated 07/05/1992 wherein, advance increments have been granted to similarly placed employees	18	"F"
8.	Wakalatnama	19	

\_\_\_\_\_  
...APPELLANT

Dated: \_\_\_\_\_/2022

Through

\_\_\_\_\_  
(Muhammad Ahsan Khan Tanoli)  
Advocate Supreme Court of Pakistan

03469588583

**BEFORE THE CHAINMAN SERVICE TRIBUNAL KP**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 586

Nisar Ahmed (Retired) District Director Agriculture, District Haripur, Dated 15-4-2022  
...APPELLANT

**VERSUS**

1. Govt. of Pakhtunkhwa through Chief Secretary, Peshawar.
2. Secretary Agriculture Lives Stock and Cooperative Department KP Peshawar.
3. Secretary Finance KP Peshawar.
4. Secretary Establishment KP Peshawar.
5. Director General Agriculture Extension Department KP Peshawar.
6. District Director Agriculture District Haripur.

...RESPONDENTS

**SERVICE APPEAL** U/S 4 OF KP SERVICE  
TRIBUNAL ACT 1974 FOR DECLARATION TO THE  
EFFECT THAT THE APPELLANT GOT  
APPOINTMENT AS AGRICULTURAL OFFICER  
HAVING MASTER OF SCIENCE HONRS IN  
AGRICULTURE VIDE APPOINTMENT ORDER  
DATED 27-09-1984 THE APPELLANT AS PER  
COMMENT OF KP NOTIFICATION DATED  
24.08.1983, IS ENTITLED TO FOUR ADVANCE

Filed to-day

  
Registrar  
15/4/2022



INCREMENTS WHICH WERE GRANTED TO OTHER SIMILARLY PLACED EMPLOYEES HAVING THE SAME AND SIMILAR QUALIFICATION VIDE ORDER DATED 07.05.1992. HENCE, THE APPELLANT IS ALSO ENTITLED TO BE GRANTED FOUR ADVANCE INCREMENT FROM THE DATE OF HIS INITIAL APPOINTMENT I.E. 27.09.1984 RESPONDENT'S DEPARTMENT IS NOT GOING TO ALLOW THE SAID INCREMENTS TO THE APPELLANT WHICH IS PERVERSE, DISCRIMINATORY, AGAINST THE LAW.

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**PRAYER:-** ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO ALLOW FOUR ADVANCE INCREMENTS TO THE APPELLANT W.E.F. THE DATE OF HIS APPOINTMENT I.E. 27.09.1984 AND ARREARS THEREOF MAY ALSO BE GRANTED AND THE SAME MAY BE CONVERTED TOWARDS PENSION OF THE APPELLANT. ANY OTHER RELIEF WHICH THIS HON'BLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

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Respectfully Sheweth,

The facts forming the background of the instant service appeal are arrayed as under:

1. That, the appellant has got appointment as Agricultural Officer in the office of respondent No. 2 vide appointment order dated 27<sup>th</sup> September 1984. The appellant has been retired from service on superannuation on 21.03.2021. (Copy of retirement order of appellant is annexed as Annexure "A").
2. That at the time of appointment of the appellant, requisite qualification for the post of Agricultural Officer was "MSC, Agri, or equivalent qualification from the recognized university" vide recruitment rule notification dated 1<sup>st</sup> February 1981. (Copy of relevant rule at time of appointment of the appellant is attached as Annexure "B").
3. That the qualification of the appellant at the time of appointment was MSC honour Agriculture.

(Copy of degree of MSC honour in Agriculture of the appellant is annexed as Annexure "C").

4. That as per notification of Finance Department dated 24<sup>th</sup> August 1983 04 increments are to be granted on the basis of possessing higher qualification. (Copy of relevant notification dated 24.08.1983 is attached as Annexure "D").
5. That the appellant started shuttling in the respondents' offices for grant of advance increments from the date of his initial appointment but the respondents' department did not allow the said increments to the appellant so far. Hence, the appellant filed department appeal on 28.09.2020 vide covering letter No.313 dated 28.09.2020 but the respondents did not bother to reply to the appellant so far. (Copy of departmental appeal dated 28.09.2020 along with covering letter dated 28.09.2020 are attached as Annexure "E").

Hence, the instant service appeal is filed inter-alia on the following grounds:

**GROUND:-**

- a) That, the conduct of respondents towards the appellant is malafide, perverse, discriminatory, against the law as well as against the notifications in vogue regarding grant of increments. The respondents' department is supposed to have one yard stick while granting increments on the basis of possessing higher qualification.
  
- b) That Article-25 of the Constitution of Islamic Republic of Pakistan 1973, envisages that all the persons are to be treated equally. Besides, equal protection of law is the fundamental rights of every citizen/ employee as enshrined in the Constitution of Islamic Republic of Pakistan 1973.
  
- c) That the appellant has been discriminated as the department granted increments to other employees having the same qualification and similarly placed vide notification No. 18/81(5-1)5754-59-/DGA dated 07.05.1992.

Copies of notification dated 07/05/1992 wherein, advance increments have been granted to similarly placed employees are attached as Annexure "F").

- d) That it has now been settled by the superior courts that once a benefit is granted to an employee that benefit may also be granted to all the employees to are similarly placed. When respondents granted increments to other similar and similarly placed employees having the same qualification to that of the appellant, then the appellants is also entitled for the said increments.
  
- e) That when law prescribe a thing which is to done in a particular manner that must be done in that manner and not otherwise. Superior courts also held in so many cases once a benefit is allowed, the same may also be granted to other similarly placed employees without forcing them to indulge in litigation.

- f) That this fact may not be left to fade in oblivion that the appellant on the analogy of similarly placed employees is eligible and entitled to receive advance increments from the date of his initial appointment.
- g) That it is a sorrow state of affairs, that respondents' department is not going to allow the benefits to the appellant which are admissible to the appellant. In such like situations, court should not fold up its hand while granting relief to the aggrieved party.
- h) That the matter relates to the terms and conditions of service, therefore, this Honourable tribunal has jurisdiction to entertain the instant service appeal U/S 212 of the constitution.
- i) That the appellant being in service employee has got a continuing cause of action to agitate the matter before the competent forum. Hence, question of limitation does not arise.

**PRAYER:**

It is prayed that on acceptance of the instant service, appeal, respondents may graciously appeal, respondents may graciously be directed to allow four advance increments to the appellant w.e.f. the date of his appointment i.e. 27.04.1984 and arrears thereof may also be granted and the same may be converted towards pension of the appellant. Any other relief which this Honourable Tribunal deemed appropriate in the circumstances of the case may also be granted to the appellant.



....APPELLANT

Through;

Dated:- \_\_\_\_\_/2022



(Muhammad Arshad Khan Tanoli)  
Advocate Supreme Court of Pakistan

**VERIFICATION:-**

Verified that the contents of the instant **Service Appeal** are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

Dated:- \_\_\_\_\_/2022



...APPELLANT

**BEFORE THE CHAINMAN SERVICE TRIBUNAL KP**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2022

Nisar Ahmed (Retired) District Director Agriculture, District Haripur.  
...APPELLANT

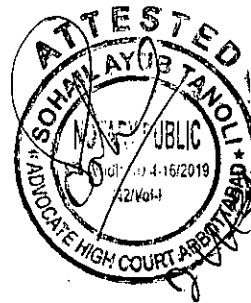
**VERSUS**

Govt. of Pakhtunkhwa through Chief Secretary, Peshawar & others.  
....RESPONDENTS

**SERVICE APPEAL**

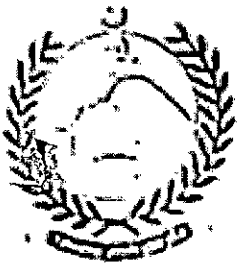
**AFFIDAVIT**

I, *Nisar Ahmed (Retired) District Director Agriculture, District Haripur*,  
do hereby solemnly affirm and declare that the contents of foregoing service  
appeal are true and correct to the best of my knowledge and belief and  
nothing has been concealed therein from this Honourable Court.



DEPONENT





**Annex-A**

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK FISHERIES & COOPERATIVE  
DEPARTMENT

P-10

Dated Peshawar, the 07<sup>th</sup> April, 2021

**NOTIFICATION**

**NO. SOE (AD)21-382/94/ Nisar Ahmad/EW/21: 1478** In terms of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981 and instructions issued from time to time, sanction is hereby accorded to encashment of leave preparatory to retirement, equal to 365 days in favour of Mr. Nisar Ahmad (BS-19), District Director Agriculture (Extension), Haripur, w.e.f 01.04.2020 to 31.03.2021.

02. In pursuance of Section-13 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, Mr. Nisar Ahmad (BS-19), District Director Agriculture (Extension), Haripur, Peshawar stands retired from Government Service w.e.f 31-03-2021 (A.N) on attaining the age of superannuation, as his date birth is 01-04-1961.

Sd/-

SECRETARY AGRICULTURE

**Endst. of Even No. & Date.**

Copy forwarded for information and necessary action to the: -

- 1) The Director General, Agriculture (Extension), Khyber Pakhtunkhwa, Peshawar.
- 2) The District Director Agriculture. (Extension), Haripur, Khyber Pakhtunkhwa.
- 3) The District Accounts Officer, Haripur.
- 4) Officer concerned.
- 5) P.S to Secretary, Agriculture, Livestock and Cooperative Department, Khyber Pakhtunkhwa, Peshawar.
- 6) P.A to Deputy Secretary (Admin.), Agriculture, Livestock and Cooperative Department, Khyber Pakhtunkhwa, Peshawar.
- 7) Master file.

*Attested*  
Office No. 33 Adjacent to  
Post Office Haripur

SECTION OFFICER-ESTT.  
AGRICULTURE DEPARTMENT

Annex-B

8

EXTRAORDINARY  
GOVERNMENT



REGISTERED NO. P11  
G A Z E T T E

P-11

**KHYBER PAKHTUNKHWA**

Published by Authority

PESHAWAR, TUESDAY, 15TH MAY, 2012.

PROVINCIAL ASSEMBLY SECRETARIAT  
KHYBER PAKHTUNKHWA

**NOTIFICATION**

Dated Peshawar, the 15th May, 2012.

No. PA/Khyber Pakhtunkhwa/Bills/2012/20711.—The Khyber Pakhtunkhwa Cessation of Payment of Arrears on Advance Increments on Higher Educational Qualification Bill, 2012 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 8<sup>th</sup> May, 2012 and assented to by the Governor of the Khyber Pakhtunkhwa on 11<sup>th</sup> May, 2012 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

**THE KHYBER PAKHTUNKHWA CESSATION OF PAYMENT OF ARREARS ON  
ADVANCE INCREMENTS ON HIGHER EDUCATIONAL QUALIFICATION  
ACT, 2012.**

(KHYBER PAKHTUNKHWA ACT NO. IX OF 2012)

*(first published after having received the assent of the Governor of the Khyber  
Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa  
(Extraordinary), dated the 15<sup>th</sup> May, 2012).*

AN  
-ACT

*to cease the payment of arrears accrued on account of advance increments on  
higher educational qualification.*

WHEREAS advance increments have been granted to certain Provincial Government employes on the basis of acquiring or possessing higher educational qualification over and above the prescribe educational qualification from time to time;

893

*Attorney*  
*[Signature]*  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad



894 KHYBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 15th MAY, 2012.

AND WHEREAS the Provincial Government vide Notification No. (PRC)1-1/2001, dated 27.10.2001, had already discontinued the scheme of advance increments on higher educational qualification;

AND WHEREAS due to financial constraints, it is not possible for Provincial Government to pay the claimed and unclaimed arrears accrued from the said increments;

It is hereby enacted as follows:-

1. Short title, application and commencement.— (1) This Act may be called the Khyber Pakhtunkhwa Cessation of Payment of Arrears on Advance Increments on Higher Educational Qualification Act, 2012.

(2) It shall apply to all the employees of the Provincial Government, who were entitled to received advance increments on higher educational qualification.

(3) It shall come into force at once and shall be deemed to have taken effect on and from 1<sup>st</sup> day of December, 2001.

2. Cessation of payment of arrears on advance increments on higher educational qualification.—(1) Notwithstanding anything contained in any decision, judgment and order of any Tribunal or Court including High Court or Supreme Court of Pakistan, for the purpose of any claim for payment of arrears on account of advance increments on higher educational qualification sanctioned in pursuance of any order, letter, office memoranda, notification, instructions and other instruments issued before 1.12.2001, such orders, letters, office memoranda, notifications, instructions and other instruments shall be deemed to be non-existent, ceased or revoked and no further claim whatsoever on the basis of these instruments shall be entertained and all cases in respect of such claims pending in any Court or Tribunal including High Court and Supreme Court of Pakistan shall stand abated.

(2) Any order made, instruction issued, decision, judgment or order of any Court or Tribunal including a High Court or the Supreme Court, implemented immediately before the commencement of this Act, shall be deemed to have been validly made, issued and implemented by the date of commencement of this Act, and any amount already paid there-under on account of advance increments or arrears thereof shall be deemed to have been validly paid and shall not be recoverable from the recipient Government employees.

Attested

Muhammad Arshad Khan  
Advocate High Court  
Office No 33 Adjacent to  
Dist. Bar Association



KHYBER PAKHTUNKHWA GOVERNMENT GOVT. EMPLOYEES' REGULATIONS, 2012 (23)

3. Removal of difficulties. If any difficulty arises, in giving effect to the provisions of this Act, the Provincial Government may make such orders as it may deem just and equitable.

4. Report. The Khyber Pakhtunkhwa Commission of Payment of Arrears on Advance Increments on Higher Educational Qualification Ordinance, 2012 (Khyber Pakhtunkhwa Ordinance NO. 1 of 2012), is hereby repealed.

BY ORDER OF MR. SPEAKER

PROVINCIAL ASSEMBLY OF KHYBER  
PAKHTUNKHWA

(AMANULLAH)  
Secretary  
Provincial Assembly of Khyber Pakhtunkhwa

Printed and published by the Manager,  
Staty. & Ptg. Dept., Khyber Pakhtunkhwa, Peshawar

Attested  
*[Signature]*  
Secretary  
Office No 33 Adjacent to  
Distt 30r Abbottabad

9



GOVERNMENT OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK FISHERIES &  
COOPERATIVE DEPARTMENT

No. SOE(AD)2(2)16/2020/EW/KC/313  
Dated Peshawar, the September 28<sup>th</sup>, 2020

**Annex - E**

To,

The Director General,  
Agriculture (Extension),  
Khyber Pakhtunkhwa, Peshawar.

**P-17**

SUBJECT: APPEAL FOR GRANT OF ADVANCE INCREMENTS

I am directed to refer to your letter number Acctt/17665/DGAE dated 31.08.2020 on the subject cited above and to state that your view point about qualification and subsequent benefit to the applicants is not clear.

02. You are therefore advised to re-examine the case thoroughly in light of relevant rules as to why they were not granted benefit of increments.

Encls. As Above.

SECTION OFFICER-ESTT:

Endst. No. & Date Even.

Copy Forwarded to the:

1. P.S to Secretary Agriculture, Livestock, Fisheries & Cooperative Department Khyber Pakhtunkhwa, Peshawar.
2. Master File

5984  
01/10/20

SECTION OFFICER-ESTT:

Muzaffar Ahmad  
Advocate High Court  
Office No. 33  
Distt. Bar

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*Cashier*  
*8/10*



OFFICE OF THE DISTRICT DIRECTOR  
AGRICULTURE EXTENSION HARIPUR



P-17-A

Phone Number 0995-614187 Fax Number : 0995-612237

Facebook & Twitter :@ Agriculture Extension Department Haripur

No. /D.D.A Haripur

Dated Haripur, the

/2020

To,

The Honorable Secretary,  
Department of Agriculture, Livestock & Cooperative,  
Govt. of Khyber Pakhtunkhwa Peshawar.

Ahmed - E

Through:

Proper Channel

P-17-A

Subject :-  
Memo

GRANT OF ADVANCE INCREMENTS

This refers to the Director General Agriculture Research System office order No. 2914-32/DGA(R) dated 07-04-2000 (copy enclosed as annexure-I)

Sir, Your good attention is drawn towards above quoted office letter/order whereby old MSc (Hons) Agriculture degree awarded after 05 years course after matriculation was held at par with M.Phil for grant of advance increment. Consequently, all research officers holding old MSc (Hon) Agriculture working in Agriculture Research system were allowed advance increments w.e from 01-07-1983.

That keeping in view the above quoted notifications/ order and other such cases your honors is requested to please review admissibility of advance increment to undersigned. Your kind consideration will make this long overdue right of old graduates to be restored, let justice be prevailed and review spirit of serving public.

Your's faithfully,  
(Nisar Ahmad)

*Nisar Ahmad*  
DISTRICT DIRECTOR  
AGRICULTURE HARIPUR



OFFICE OF THE DISTRICT DIRECTOR  
AGRICULTURE EXTENSION HARIPUR



P-17-B

Phone Number 0995-614187 Fax Number : 0995-612237

Facebook & Twitter : @ Agriculture Extension Department Haripur

No. 9212 /D.D.A Haripur  
To

Dated Haripur, the 22/4/2020

The Director General,  
Agriculture Extension,  
Khyber Pakhtunkhwa Peshawar.

P-17-B

Subject :- GRANT OF ADVANCE INCREMENTS

Memo

Enclosed please find herewith the above cited subject letter for information and onward submission to the quarter concerned.

Enclosed (02)

  
DISTRICT DIRECTOR  
AGRICULTURE HARIPUR



OFFICE OF THE DISTRICT DIRECTOR  
AGRICULTURE EXTENSION HARIPUR



Phone Number 0995-614187 Fax Number: 0995-612237

Facebook & Twitter @Agriculture Extension Department Haripur

No. 409 /D.D.A Haripur

Dated Haripur, the 25/08/2020

To

The Director General,  
Agriculture Extension,  
Khyber Pakhtunkhwa Peshawar.

Subject:-  
Memo:-

**APPEAL FOR THE GRANT OF ADVANCE INCREMENTS**

Please refer to Section Officer Establishment Office letter No. SOE (AD) 1 (2) 16/2019/ M.Phil/P.hd dated 12/08/2020 on the subject noted above.

In this regard required clarification on behalf of undersigned is as under:-

1. That I had already completed MSC (Hons) Theory and Practical before the joining of duty on 27/09/1984. Photocopy Provisional Certificate Annexed as Annexure-I and vide letter No. 18/8-A/Estt:- 12831-64/DA dated Peshawar 19/09/1984. Photocopy annexed as annexure II. The Govt. appointed on adhoc on the basis of MSC (Hons) Theory and Practical.

Then Govt. regularized the services w.e.f 19/03/1987 on the basis of MSC (Hons) Agriculture vide notification Endst. No. SOE (AD) 11(2) 280/83/4847-58 dated Peshawar 10/07/1988 (Photocopy annexed as annexure III).

2. Scheme of study during my stay at the then faculty of Agriculture University of Peshawar was that I got admission there after matriculation. I first completed FSC after 02 years of studies. Then I obtained BSC (Hons) degree after 03-years study period. Finally I got MSC (Hons) Agriculture Degree after studying further for 02 years. Meaning that after matriculation the undersigned spent 07 years of study to complete my MSC (Hons) Agriculture degree.

3. It is true that I was in service when award of advanced increments was upheld in 1983 by the Finance Department Khyber Pakhtunkhwa. I approached relevant authorities at Directorate as well as Secretariat level on several occasion for grant of the advance increments but I have been denied the facility on account of un-clarity on permissibility of the said increment. It was then understood that it was allowed only to the employees /Officers who have obtained 04 year BSC (Hons) degree after FSc. Recently, I have received a notification regarding permissibility of the advance increments to employees/ officers having MSc. (Hons) degree without any condition of 03 or 04 years BSC (Hons) degree.

Therefore it is requested that my appeal for the grant of advance increments may please be sympathetically considered in the light of enclosed notification /documents.

  
o/c DISTRICT DIRECTOR  
AGRICULTURE HARIPUR



COPY

GOVERNMENT OF NWFP  
AGRICULTURE, FOOD & COOPERATION  
DEPARTMENT.

DATED PESH:THE \_\_\_\_\_/1992.

P-18

ORDER

No. SOE(AD)2(2)16/91-II. The Governor NWFP, on verification of the degree of M.Sc(Hons) Agri: by Director General Agri:(Extension)NWFP, and Director Water Management NWFP, Peshawar, is pleased to allow two advance increments to the following Officers of Agri:Department from the date of issuance of their M.Sc(Hons)Agri:Degrees noted against each as admissible in terms of para-10(iii) of Finance Deptt: circular letter No. FD(SR-I)1-67/82 dated 24.6.1983.

S.No. Name & Designation of the Officer. Date from which advance increment are allowed.

1. Mr. Maroof Shah, Agriculture Officer, 27.2.1991.
2. Mr. Mukhtar-ur-Rehman, Agriculture Officer, 8.7.1991.
3. Mr. Qasir Alam Khan, Agril:Officer, 12.9.1989.
4. Mr. Inamullah, Agricultural Officer, 26.3.1991.
5. Mr. Mohammad Navid, Agril:Officer, 26.3.1991.
6. Mr. Haq Nawaz, Water Management Ext:Specialist, 26.3.1990.
7. Mr. Haji Mohammad, Agriculture Officer, 26.3.1991.
8. Mr. Asif Saleem, Agril:Officer, 17.7.1989.
9. Mr. Nasibur Rehman, Water Management Officer, 6.1.1991.

Sd/-SECRETARY AGRICULTURE.

Endst:No. SOE(AD)2(2)16/91-II/102008-215 Dated Pesh:the 2/4/1992.

1. Copy forwarded for information and N/Action to the Director General Agri:Exted:N.W.F.P. Peshawar.
2. Director Water Management NWFP, Peshawar, w/r
3. Accountant General N.W.F.P., Peshawar.
4. All Distt://Agency Accounts Officers. (5) Officer concerned
5. Personal file of the officers. (7) Office order file. (8) Section Officer (SR-II) Govt:of NWFP, Finance Deptt:w/r to his letter referred to above.

Sd/-(NISAR ALI SHAH),  
SECTION OFFICER (ESTABLISHMENT).

18/81(E-1)5754-59 /EGA, Dated Pesh:the 7/5/1992.

Copy to the D.D.A. Hazara Division Abbottabad.

Sd/-  
deputy director of agriculture,  
ECONOMIC

*[Handwritten signatures and stamps]*

Better copy  
Annex 2

GOVERNMENT OF NWFP  
AGRICULTURE, FOOD & COOPERATION  
DEPARTMENT

DATED PESHAWAR THE \_\_\_/1992

O R D E R

No. 302(AD)2(2)16/91-II. The Governor H.F.F., on verification of the degree of B.Sc. (Hons) Agriculture by Director General, Agril. (Extension) H.F.F. and Director, Water Management, H.F.F., Peshawar, is pleased to allow the advance increments to the following officers of Agriculture Department from the date of issuance of their B.Sc. (Hons) Agri. Degrees noted against each as admissible in terms of para-10(111) of Finance Department Circular letter No. FD(SR-I) 1-67/82 dated 24-0-1983:-

Sr No	Name and Designation of the officer	Date from which advance increments are allowed
1-	Mr. Haroof Shah, Agricultural Officer.	17-2-1991
2-	Mr. Mukhtar-ur-Rahman, Agricultural Officer.	8-7-1991 ✓
3-	Mr. Qaiser Altam Khan, Agril. Officer.	12-9-1989
4-	Mr. Inasullah, Agricultural Officer.	26-3-1991
5-	Mr. Mohammad Navood, Agricultural Officer.	26-3-1991
6-	Mr. Ishaq Nawaz, Water Management Extn. Specialist.	26-3-1990
7-	Mr. Haji Mohammad, Agricultural Officer.	26-3-1991
8-	Mr. Asif Saloom, Agricultural Officer.	17-7-1989
9-	Mr. Nasibur Rehman, Water Management Officer.	6-1-1991

*Copy*

SECRETARY AGRICULTURE

Encl: No. 302(AD)2(2)16/91-II/ 10258-215 Dated Peshawar the 2/4/1992

Copy forwarded for information and action to the:

- 1- Director General, Agricultural (Extension) H.F.F., Peshawar w/r to his Nos. No. 18/81(D-1)9058/DG (Ext) dated 30-7-1991, No. 18/81(D-1)9860/DG (Ext) dated 30-9-1991, No. 18/81(D-1)11179/DG (Ext) dated 3-9-1991, No. 18/81(D-1)11539/DG (Ext) dated 10-9-1991, No. 18/81(D-1)12194/DG (Ext) dated 28-9-1991, No. 18/81(D-1)12196/DG (Ext) dated 28-9-1991, No. 18/81(D-1)12314/DG (Ext) dated 1-10-1991, & No. 18/81(D-1)15737/DG (Ext) dated 7-12-1991
- 2- Director, Water Management, H.F.F., Peshawar w/r to his Nos. No. 5411/2/16/DWM dated 18-8-1991 & No. 6412/2/16/DWM dated 9-10-91.

Contd.....P/2-

38

DAO Alalad

- 3
- 4
- 5
- 6
- 7
- 8

Accountant General, NWFP, Peshawar.

All Districts/Agency Accounts Officers.

Officers concerned.

Personal files of the officers.

Office order file.

Section Officer (SR-II) Government of NWFP, Finance Department w/r to his letter referred to above.

(Nisar Adil Singh)

SECTION OFFICER (ESTABLISHMENT)

Nisar/\*  
31-3-92

1-12-90: D. 2220 ✓

1-6-91: D. 3085 ✓

8-7-91: D. 3515 ✓

~~1-12-91: D. 2300~~

~~8-7-~~

1-12-91: D. 3730 ✓

1-12-90: D. 2220 ✓

1-6-91: D. 2375 ✓ 3085

1-12-91: D. 2530 ✓ 3300

کورٹ فیس

# وکالت نامہ

Chairman Service Tribunal etc Peshawar بعدالت

Wisar Ahmed نام Govt of KPK etc عنوان:

Appellant منجانب:

Service Appeal نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام

ATD M. Arshad Khan Panohi Asc Adr

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد

استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

Attested

بمقام

المرقوم:

Office No 33 Adj...  
33r Abb...

Nisar Ahmed