

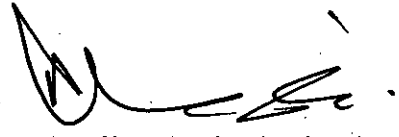
3rd July, 2023

1. Nobody present on behalf of the appellant. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.
2. The case was called time and again but neither the appellant nor his counsel put appearance, therefore, the appeal in hand is dismissed in default. Consign.
3. *Pronounced in open Court in Peshawar given under our hands and seal of the Tribunal on this 3rd day of July, 2023.*

SCANNED
KPST
Peshawar



(Rashida Bano)
Member(J)



(Kalim Arshad Khan)
Chairman

Adnan Shah

31st Mar, 2023

Learned counsel present. Mr. Fazal Shah Mohmand,
Addl: AG alongwith Mr. Imran, Assistant for the
respondents present.

Learned counsel for the applicant seeks adjournment.
To come up for arguments on 29.05.2023 before D.B. P.P
given to the parties.



(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman

SCANNED
Peshawar

29th May, 2023

1. Appellant in person present. Mr. Fazal Shah Mohmand,
Additional Advocate General for the respondents present.

2. Appellant requested for adjournment on the ground that his
counsel is busy before Hon'ble Peshawar High Court, Peshawar.
Last chance is given. Adjourned. To come up for arguments on
03.07.2023 before D.B. P.P given to the parties.



(Muhammad Akbar Khan)
Member (E)



(Kalim Arshad Khan)
Chairman

SCANNED
Peshawar

*Kaleem Ullah


17th Nov. 2022


Clerk of counsel for the appellant present.

Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Lawyers are on general strike. To come up for arguments on 22.12.2022 before the D.B.

SCANNED
ST
Peshawar


(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member(J)

22nd Dec. 2022

Counsel for the appellant present. Mr. Muhammad Jan,

District Attorney alongwith Irfan, Subject Specialist for the respondents present.

SCANNED
ST
Peshawar

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Last opportunity is granted to learned counsel for the appellant for arguments on the next date, failing which the case will be decided on the basis of available record. To come up for arguments on 31.03.2023 before the D.B.


(FAREEHA PAUL)
Member(E)


(ROZINA REHMAN)
Member (J)

28.10.2022

Nemo for the appellant. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for the respondents present.

Notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments before the D.B on 17.11.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

17th Nov. 2022

Clerk of counsel for the appellant present.

Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for the respondents present.

Lawyers are on general strike. To come up for arguments on 01.2023 before the D.B.

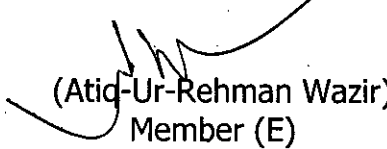
(Fareeha Paul)
Member(E)

(Rozina Rehman)
Member(J)

Noted.
10/11/2022
SCANNED
DIRECTOR GENERAL

23.12.2021

Syed Noman Ali Bukhari, Advocate present and submitted Wakalatnama in favor of appellant. Mr. Muhammad Rasheed, Deputy District Attorney for respondents present. Being freshly engaged learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments before the D.B on 06.04.2022.

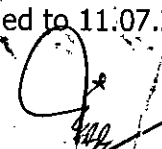

(Atiq-Ur-Rehman Wazir)
Member (E)


Chairman

06.04.2022

Appellant present in person. Mr. Kabirullah Khattak Adl. AG along with Mr. Shoib Akhtar ADEO for respondents present.

Counsel are at strike. Therefore the case is adjourned to 11.07.2022 before D.B.


(Mian Muhammad)
Member (E)


Chairman


11-7-2022

*Due to Holidays of Eid Ul Azha
the case is adjourned to 14-10-2022*

Reacher

14th Oct., 2022

Because of strike of the Bar, this matter is adjourned to 28.10.2022. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

31.12.2020


Due to summer vacation, case is adjourned to 18.3.2021 for the same as before.


Reatler

18.03.2021

Junior to counsel for the appellant and Additional Advocate General for the respondents present.

Former requests for adjournment due to illness of learned senior counsel for the appellant today. Adjourned to 20.05.2021 for arguments before D.B.


(Salah-ud-Din)
Member (J)


Chairman

20.5.21

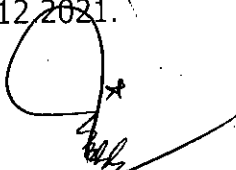
Due to COVID 19, the case is adjourned to 13-9-2021 for the same.



Reatler

13.09.2021

Appellant in person present. Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Appellant requested for adjournment on the ground that his counsel is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B on 23.12.2021.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

19.08.2020

Due to summer vacations, the case is adjourned to
29.10.2020 for the same.



Reader

29.10.2020


Proper D.B is on Tour, therefore, the case is
adjourned for the same on 31.12.2020 before D.B.



Reader

10.02.2020 Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 31.03.2020 for arguments before D.B.

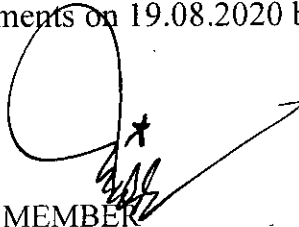

(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

31.03.2020 Due to public holiday on account of COVID19, the case is adjourned to 10.06.2020 for the same as before.


Reader


10.06.2020 Counsel for the appellant present. Addl: AG alongwith respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 19.08.2020 before D.B.



MEMBER


MEMBER

31.07.2019

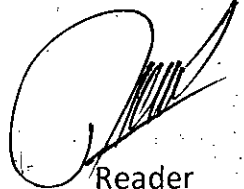
Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 25.10.2019 before D.B.


Member


Member

25.10.2019

Due to tour of the Hon'ble Members to Camp Court Abbottabad, To come up for the same on 10.12.2019 before D.B.


Reader

10.12.2019

Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Inayatullah, ADEO for the respondents present.

Due to general strike of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Adjourned to 10.02.2020 for arguments before D.B.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

08.04.2019

Junior to counsel for the appellant present. Mr. Ziaullah,
DDA for respondents present. Junior to counsel for the appellant
present and seeks adjournment. Adjourned. Case to come up for
arguments on 10.06.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

10.06.2019

Ms. Zille Huma, Advocate for Mr. Muhammad Adeel
Butt, Advocate counsel for the appellant and Mr. Muhammad
Jan, DDA for the respondents present.

Learned counsel for the appellant requests for
adjournment due to non-availability of learned senior counsel
for the appellant who has proceeded to appear in courts at
Islamabad. Adjourned to 31.07.2019 before the D.B.

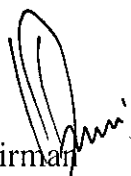

Member


Chairman

07.12.2018

Appellant alongwith and Mr. Muhammad Jan, DDA alongwith Inayatpur Rahman, ADO for the respondents present.


Learned DDA requests for further time for filing of comments/reply by respondent No. 4 as he had not been contacted nor instructed by the said respondent. Adjourned to 16.01.2019 before S.B.


Chairman

16.1.2019

Appellant in person and Addl. AG for the respondents present.

Respondent no. 4 is yet to submit reply in the matter. The said respondent shall be put on notice for doing the needful on 26.02.2019 failing which the case would be proceeded on the strength of available record.


Chairman

26.02.2019

Appellant in person and Mr. Kabirullah Khattak Addl; AG for the respondents present. None present on behalf of respondents No.4 nor their written reply received despite several opportunities granted to them. As such defense of the respondent is struck off. To come up for arguments on 08.04.2019 before D.B.


(Ahmed Hassan)
Member

06.06.2018

Appellant in person and Addl: AG for the respondents present. ~~Written reply not submitted.~~ Requested for adjournment. Adjourned. To come up for written reply/comments on **13.07.2018** before S.B


Member

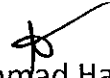
13.07.2018

Neither appellant nor his counsel present. Sardar Shaukat Hayat, Addl. Advocate General on behalf of the respondents present and made a request for adjournment. Granted. To come up for written reply/comments on **27.08.2018** before S.B.


Chairman

27.08.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Inayatullah, ADO for the respondents present. Representative of respondents No. 1 & 2 submitted written reply. Learned Additional AG made a request for adjournment on behalf of respondents No. 1 & 4 for filing of written reply. Granted. To come up for written reply/comments on behalf of respondents No. 1 & 4 on **23.10.2018** before S.B.


(Ahmad Hassan)
Member

23-10-18

*Due to Retirement of Honorable Chairman
The Tribunal is non functional therefore the
Case is adjourned To come up for the same on
7-12-2018*


Reader

05.03.2018

Clerk of the counsel for appellant present and seeks adjournment as his senior counsel is not available today. To come up for preliminary hearing on 03.04.2018 before S.B.


(Gul Zeb Khan)
Member

03.04.2018

Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 17.04.2018 before S.B


Member

17.04.2018

Counsel for the appellant Ishtiaq Ahmed present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving in Education Department as untrained SCT in BPS-9. It was further contended that the respondent-department has issued a order of graded pay to other similar employees but the respondent-department has ignored the appellant without any reason. It was further contended that the appellant filed departmental appeal/representation but the same was not responded hence, the present service appeal. It was further contended that since similarly placed employees have been issued graded pay by the government department therefore, the appellant is also entitled for the graded pay.




The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 06.06.2018 before S.B.


(Muhammad Amin Khan Kundi)
Member

Appellant Deposited
Security & Process Fee

Form-A
FORM OF ORDERSHEET

Court of _____
Case No. 147/2018


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	30/1/2018	<p>The appeal of Mr. Ishtiaq Ahmad resubmitted today by Mr. Muhammad Adeel Butt Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	06/02/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/02/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	12.02.2018	<p>Clerk of the counsel for appellant present and requested for adjournment on the ground that learned counsel for the appellant is not in attendance today due to strike of the Bar. Adjourned. To come up for preliminary hearing on 05.03.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member (J)</p>

The appeal of Mr. Ishtiaq Ahmad son of Mushtaq Ahmad SCTGHSS Akbar Pura Distt. Nowshera received today i.e. on 22.01.2018 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 appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.

No. 174 /S.T,

Dt. 24/01 /2018


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Adeel Butt Adv. Pesh.

*Resubmitted. The queries are
settled / corrected as per rules.
Adeel Butt*

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

Service Appeal No. 147, 2018

Ishtiaq Ahmed S/O Mushtaq Ahmad, SCT Government Higher Secondary School,
Akbar Pura, District Nowshera

Versus

Govt. Of Khyber Pakhtun khwa & Others.

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S.No	Description of documents	Annex	Page
1	Grounds of Appeal along with Affidavit		1-4
2	Addresses of the Parties		5
3	Copy of the appointment Order	"A"	6
4	Copy of the departmental appeal/re presentation	"B"	7
6	Copy of the service record	"C-C26"	8-33
7	Wakalatnama		

Appellant

Through

Muhammad Adeel Butt,

Advocate, Peshawar

Dated

1

Before the Honorable Service Tribunal Khyber Pakhtun Khwa , Peshawar.

Service Appeal No. 147, 2017

Ishtiaq Ahmed S/O Mushtaq Ahmad ,SCT Government Higher Secondary School
,Akbar Pura ,District Nowshera

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 78

Dated 22-1-2018

Versus

1. The Government of Khyber Pakhtun Khwa through Secretary E&SL, Peshawar
2. The Director E&S ,Directorate E&S ,Peshawar
3. The District Education Officer ,Nowshera
4. District Accounts Officer, Nowshera.

Appeal under section 4 of the Service Tribunal Act, 1974 whereby the Respondents have given no attention to the Representation made to them by the Appellant , for the grant of graded pay and consequential benefits.

On Acceptance of this Appeal, this Honorable Court may please hold the Appellant entitled for the award of graded pay and all the benefits attached to it.

Filed to-day

Registrar

22/1/18

Respectfully Sheweth,

1. That the Appellant was appointed on 0610/1995, against the Post of C.T in BPS -9 by the Respondents department on fixed pay, and since then he is serving the department with zeal and devotion.(Copy of the appointment Order is annexed as Annexure "A").

It is important to mention that during the days of Appellant's appointment, there were available no trained teachers and the Respondent Department had no other option, hence, the appointment of untrained teachers took place. Due to their appointment thousands of students were able to get education.(copy of the appointment order is attached Annexure "A".

Registrar

30/1/18

Re-submitted to day
and filed.

- 2. That, upon completion of teachers training, after four years of service, the Respondents allowed the graded pay / regularization with effect from 31/03/1999.
- 3. That the appellant throughout his service agitated for the grant of graded pay with effect for their induction/appointment in to the service but no attention, to his legitimate demand, was ever given by the respondents, hence the instant appeal .
- 4. That the Appellant filed the Representation before the competent Authority which was not responded within statutory period of 90 days and hence the instant service appeal, despite the fact, the Representation contains the judgments of the higher courts in this respect. (copy of the Representation is annexed as Annexure "B").
- 5. That the appellant, being aggrieved of the acts and omission by not treating her at par with other similarly placed employee on the same grounds, and having no other adequate and efficacious remedy, assails the same through this appeal inter alia on the following grounds:-

Grounds.

- A. That the appellant has not been treated in accordance with law and has been discriminated among similarly placed persons who were allowed graded pay for the un trained period, but, it was illegally denied to the appellant.
- B. That in the absence of any condition regarding the training and regularization , in the appointment Order , the Respondents have no rights whatsoever to deny the legitimate rights related to regularization , graded pay , seniority , promotion and other allowances, increments, etc. Had that not been the situation the Appellant might have completed his training soon after assuming the charge. It is in fact the reason that the Superiors Courts were pleased to allow the increments from the date of induction in to service to untrained teachers.

It is important to mention that the appellant been related to the Teaching Profession was appointed during the times when the trained teachers were not available and undoubtedly such teachers are the pioneers in developing the Education structure of the Province. By denying the Appellant's Service legitimate benefits, the respondents are not acknowledging their efforts, roles rather in a way they are disrespecting the Appellant's important role in developing the Education Sector.

- C. That it is a well settled principle of Law that when a point of Law was decided by the Superior Courts which not only covered the cases of Civil Servants who litigated but also those who have not litigated so the dictates of good governance demands that those judgments should also be implemented in the cases of others employed instead of constraining them to approach the Courts.
- D. That as per judgment of the Honorable Supreme Court of Pakistan, if is made to work on a particular post, then the employee will be entitled to all remuneration attached to that post.
- E. That numerous Judgments of the August Supreme Courts allowed the graded pay/running pay to untrained teachers vide Notification 30-10-2009. The Appellant been

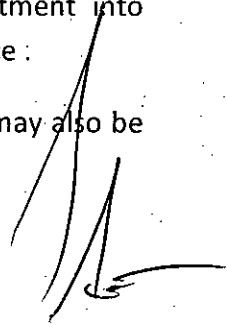
a similarly placed person cannot be deprived from the right that has already been granted to other similarly placed Persons.

- F. That Appellant case is similar and identical to those numerous cases in which civil servant had been allowed graded pay from the date of their induction in to service.
- G. That beyond any shadow of doubt the Appellants were serving on the higher grade and no law of the land restricts the Respondent to disallow such benefits to its employees, rather the August Supreme Court of Pakistan and this Service Tribunal itself has allowed numerous appeals on the same ground.
- H. That it is also important to mention that the Respondents have granted graded pay and other related benefits to other untrained teachers from the date of their induction into service, hence the appellant has been discriminated.

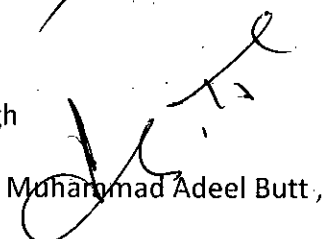
It is, therefore, most humbly requested that on the acceptance of this Service Appeal this Honorable Tribunal may please hold the Appellant entitled for the graded pay, seniority, promotion with effect from his date of his induction/ appointment into the service and the same period in service, be also counted towards his service :

Any other remedy, this Honorable Tribunal may deems appropriate may also be granted to the appellant under the circumstances

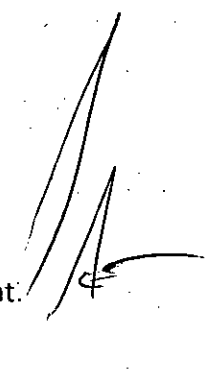
22/11/2018

Appellant 

Through


Muharomad Adeel Butt,
Advocate Peshawar.

Note: No such appeal has ever been filed on the same subject by the appellant .

Appellant. 

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

Service Appeal No. _____ 2018.

Ishtiaq Ahmed S/O Mushtaq Ahmad ,SCT Government Higher Secondary School ,Akbar Pura ,District Nowshera

Versus

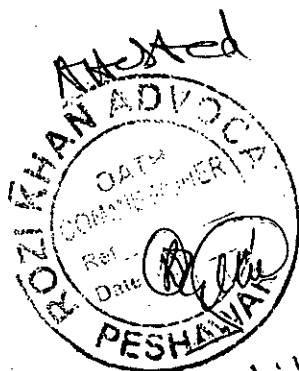
The Government of Khyber Pakhtun Khwa through Secretary E&SL, Peshawar

Affidavit

I, Ishtiaq Ahmed S/O Mushtaq Ahmad ,SCT Government Higher Secondary School ,Akbar Pura ,District Nowshera do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Deponent

Identified by :-



Muhammad Adeel Butt,
Advocate, Peshawar

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

Ishtiaq Ahmed S/O Mushtaq Ahmad ,SCT Government Higher Secondary School
,Akbar Pura ,District Nowshera

Versus

Govt. Of Khyber Pakhtun khwa & Others

Memo of Addresses

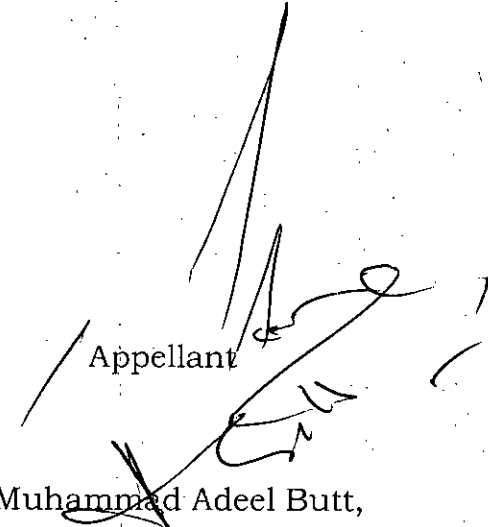
APPELLANT

Ishtiaq Ahmed S/O Mushtaq Ahmad ,SCT Government Higher Secondary School
,Akbar Pura ,District Nowshera

Respondents.

1. The Government of Khyber Pakhtun Khwa through Secretary E&SL), Peshawar
2. The Director E&S ,Directorate E&S ,Peshawar
3. The District Education Officer ,Nowshera
4. District Accounts Officer, Nowshera.

Through

Appellant

Muhammad Adeel Butt,
Advocate, Peshawar

Amir (A) (6)

APPOINTMENT

Appointment of the following person(s) is hereby ordered against the post of S.T on temporary & adhoc basis at Rs: 450 fixed plus usual allowances as permissible under the rules in BPS (Rs: 4503-97-3060) at the Institution noted against each name.

S/No;	Name, Qualification & Address	Posted at	Remarks.
1.	Mr Iqbal Ahmed P.A B/C Master Iqbal Ahmed B.A. & S.O Akbar Pura District Nowshera.	G.M.S Khair Abad Nowshera	Against Post in Mr Gul Bah S.T

TERMS & CONDITIONS

1. His/Her appointment is purely temporary & liable to termination any time without assigning reasons or notice.
2. In case of resignation he/she will have to submit one month's prior notice to the Deptt; or forfeit one month's pay in lieu thereof to the Govt;.
3. He/She is required to produce health & age certificate from the Medical authority concerned before taking over charge provide he/she is not in Govt; service.
4. He/She should not be allowed to take over charge if his/her age is less than 18 years or above 25 years.
5. His/Her apptt; is subject to further condition that he/she is domiciled of WFP.
6. His/Her antecedents forms should be obtained duly verified by the local police authorities & submit to this office together with application for apptt; on prescribed form & under taking declaration of movable & immovable property for record in this office.
7. All original educational character & domicile certificates should be thoroughly checked before handing over charge, if necessary it should be verified from the Institutions concerned.
8. If he/she fails to take over charge of the post within a week of the receipt of this order the offer of apptt; shall stand cancelled.
9. Chagereports should be submitted to all concerned.
10. No TA/DA etc is allowed.
11. He/she should be given test in Nazira (uran & Pakistan Studies & result intimated to this office.

ATTESTED

[Handwritten Signature]

Attended.
PRINCIPAL
G.H.S.S. Akbar Pura
Nowshera

(Mohammad Saad)
(SAHIB ROUM KHAN)
DIVE: DIRECTOR OF EDUCATION(S),
PESHAWAR DIVN: PESHAWAR.
15/10/1995.

E. dist; No: 6836-39 / Dated

- Copy to the; -
1. DEO(M)&(F) Secy; Nowshera
 2. DAO Charsadda./ Nowshera.
 3. Headmaster/ Headmistress Govt: High School Khair Abad (NR)
 4. Candidate concerned.
 5. Supdt; B; Branch.
 6. F/File.

[Handwritten Signature]

اپیل برائے نظر ثانی سروس ریگولر ایشن / Graded Pay / تاریخ بھرتی ان ٹرینڈ دورانہ 16/10/1995 تا

31/03/1999 و عطا ہوئی سیناری وائز

جناب عالی!

مودبانہ گزارش ہے کہ فدوی مورخہ 16/10/1995 کو بحیثیت C.T ان ٹرینڈ ٹیچر بھرتی ہوا تھا۔ چار سال ان ٹرینڈ رہا اس کے بعد فدوی نے 31/03/1999 سی ٹی ٹرینڈ مکمل کی اسی اثنا میں سپریم کورٹ آف پاکستان نے 06/09/2007 بحوالہ آرڈر نمبر 1088,1081 تمام ان ٹرینڈ ٹیچرز کو ان ٹرینڈ انکریمنٹ دینے اور سروس ریگولر کرنے کا اعلامیہ جاری کیا اور تاریخ بھرتی سے ہمیں ریگولر کیا گیا حالانکہ محکمہ تعلیم DEO نوشہرہ نے فدوی کو سیناری 189 کی بجائے 278 پر رکھا۔ حالانکہ فدوی کا سیناری 189 بنتا ہے۔ فدوی اعلیٰ تعلیم یافتہ یعنی M.A/M.Ed ہے۔ حالانکہ اس سے قبل SET-SST-SS اساتذہ کو چھ ماہ کیلئے ایڈھاک پر بھرتی کیا گیا۔ اور ریگولر کر دیئے گئے۔ جبکہ فدوی کو چار سال کا عرصہ ریگولر نہ کرنا کہاں کا انصاف ہے۔ اب چونکہ فدوی کو باوثوق ذرائع سے معلوم ہوا ہے کہ عدالت سروس ٹریبونل KPK نے بے شمار ملازمین کو ان ٹرینڈ دورانہ Graded Pay سروس ریگولر ایشن دینے کے احکامات جاری کئے ہیں۔

لہذا آپ صاحبان کی خدمت میں عرض ہے کہ فدوی کا چار سال کا عرصہ سیناری میں رکھنے اور فدوی کو سیناری لسٹ میں سیریل نمبر 189 پر رکھنے کے احکامات صادر فرمائیں۔ نقولات نوٹیفکیشن، آرڈرز، حکم فیصلہ عدالت وغیرہ درخواست اپیل کے ہمراہ لف ہیں۔

عین نوازش ہوگی

الحاضر

آپ کا تاجدار اشتیاق احمد ولد مشتاق احمد SCT گورنمنٹ ہائر سیکنڈری سکول اکبر پورہ ضلع نوشہرہ 03025932547

Forwarded to Hon Director
E & S, for onward process, please

نوٹ: تمام متعلقہ نقولات درخواست کے ساتھ منسلک ہیں۔

کاپی برائے اطلاع

۱۔ سیکرٹری ایجوکیشن صاحب KPK

۲۔ چیف سیکرٹری صاحب KPK

۳۔ DEO میل نوشہرہ

17/10/2017

ATTESTED
District Officer

Handwritten signature

Handwritten notes and dates

(For use in Police Department only).

Heirs, Passed Board Exam: 2002 Under R. No. K6295546 from the P. I. O. U. Islam Abad, obtained 542 marks out of 900 in First Division

Passed (M.A) Political Science

Examin under the R No 13313 in session 2002 from the U. O. B

Question paper scoring 423/1000 marks and placed in 1st div. The result declared on 11-5-2004

[Signature]
Principal
Govt. High School
Taru Jaba Dist. (NSR)
received back

Left thumb-impression.

[Signature]
Principal
G.H.S. Taru Jaba
Dist. Nowshera

Passed B.A Exam 1999(A) under Roll No 62431 from the university of Balochistan obtained 345 marks out of 800 placed in third division. Result was declared on 15.12.2000

Qualification Passed S.S.C exam in session 1990 (S) Date

English Under Roll No 7975 securing 34 374 marks from

Pashtu B. i. S. E Peshawar.

Urdu Passed Inter mediate Exam in session 1994 (A)

Plan-drawing Under Roll No 70402 securing 507 marks

Finger print from B. i. S. E. Peshawar.

Drill instructing

Court duties P.F.I. G. H. S. Taru Jaba Dist. Nowshera

Reserve duties Passed C.T (S) Examination 1998 under Roll no. 219051 from Federal Board of Intermediate & Secondary Education

Islam Abad (Rahman Baba College of Education Peshawar Combi.) obtained 693 marks out of 1200. Placed in grade "C" Result declared on 31-3-1999.

Qualifications First Arts

B. I. or B. A. Passed B.A Improvement (Exam) 2008 under the R/NOS 480077 from AIOU Islamabad

Obtained 646/1000 marks & placed in 1st div. The result dec on 3-3-08. Deptt permission vide EDOGS/NSR No 2034-30 dt 18/2/08

Other qualifications

Principal
G.H.S. Taru Jaba
Dist. Nowshera

Principal
Govt. High School
Taru Jaba (Nowshera)

Principal
Govt. High School
Taru Jaba (Nowshera)

Principal
G.H.S. Jehangira Road
Dist. Nowshera

Note—The entries in

1. Name
2. Race
3. Residence
4. Father's name
5. Date of birth nearly as ca
6. Exact height
7. Personal marks
8. Left hand impression of (no Little Finger Middle Finger Thumb.)
9. Signature
10. Signature Head of the Officer.

N.B.—Line to be drawn under the qualification possessed.

Attested

[Signature]
Principal
G.H.S. Jehangira Road
Dist. Nowshera

The entries in this page should be reviewed or re-attested at least every five years and the Signature in lines 9 and 10 should be dated.

Under R.No K6295546
and obtained 542
st Division
4/8/2007
Principal
Govt. High School
Jaba Distt (NSR)
received back

Name Mr. Mushtaq Ahmad

Race Syed

Residence Vill. P.O. Akbar Pura Distt. Nowshera

Father's name and residence Mr. Mushtaq Ahmad

Date of birth by Christian era as nearly as can be ascertained First April N.H. Seventy Seven
1-4-1976

Exact height by measurement 5-5

Personal marks for identification a mole on the left side of the face

Left hand thumb and finger impression of (non-palleted) officer

Little Finger Ring Finger

Middle Finger Fore Finger

Thumb.

Signature of Government servant

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

Attested
Principal
G.H.S.S. Akbar Pura
Nowshera

PRINCIPAL
G. H. S. Khair Abad
Distt: Nowshera

ATTESTED

A. Exam 1999 (A) under
131 from the university
istan, obtained
123 out of 800 placed
division. Result was
red on 1/6. Duly
2000

Principal
Govt. High School
Nowshera
Improvement (Exam)
R/Nos. 480077
Islamabad
Examination
16/1000 marks &
Dist. Div. The
on 3-3-08.
ide. EDO & NSR
18/1/08

Principal
Govt. High School
Tarkhi (Nowshera)
219051
Education
G. H. S. (Cantt.)
2007

Principal
Govt. High School
Nowshera

Principal
Govt. High School
Nowshera

3

4

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1	2	3	4	5	6	7	8	9	10
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant	Signature and designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment
C.T GHS, Khan Abad (H.S.R)		BPS-9 (1605-77-3080)	Rs. 1605/- P.M			16-10-1995	<i>[Signature]</i>	PRINCIPAL G. H. S. Khan Abad Distt: Nowshera	
-do-	-do-		Rs. 1605/- P.M			1-12-95	<i>[Signature]</i>	PRINCIPAL G. H. S. Khan Abad Distt: Nowshera	
SMS Turongzal (Chusaldra)	-do-		Rs. 1605/- P.M			15-6-96	<i>[Signature]</i>	D.E.O. (M) Secy Chusaldra	
H.S. Irmal Miana (Peshawar)	-do-		Rs. 1605/- P.M			01-09-1996	<i>[Signature]</i>	PRINCIPAL Govt. High School Irmal Miana (Pesh)	
H.S.S Akbar Pura	-do-		Rs. 1605/- P.M			1-11-96 (FN)	<i>[Signature]</i>	Principal G.H.S.S. Akbarpura (Nowshera)	
-do-	-do-		1605/-			1/12-96	<i>[Signature]</i>	Principal G.H.S.S. Akbarpura Nowshera	
								Service termin. vide D.D.E.S/ P Peshawar Ends N. Dated: 26/6/97	

Attended
PRINCIPAL
G.H.S.S. Akbar Pura
Nowshera

[Large handwritten signature]

Principal
G.H.S.S. Akbarpura
Nowshera
26/6/97

7 Date of Appointment	8 Signature of Government Secretary	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to recorded punishment or censure, or of praise of Government
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
16-10-1995	<i>ash</i>	PRINCIPAL G. H. S. K. K. Bad Distt: Nowshera	11.95	Fixed	<i>ash</i> PRINCIPAL G. H. S. K. K. Bad Distt: Nowshera	Leave	APPOINTED AGAINST C-T Post vide Divl. Director of Education's Peshawar Division Peshawar Endst No 6836-39 dt 15/10/95		
1-12-95	<i>ash</i>	PRINCIPAL G. H. S. K. K. Bad Distt: Nowshera	96	Transfer	<i>ash</i> PRINCIPAL G. H. S. K. K. Bad Distt: Nowshera	Leave			
5.6.96	<i>ash</i>	D.E.O. (M) Secy Charsadda	31.8.96	Transfer	D.E.O. (M) Secy Charsadda	Leave	Service verified w.e. 6/6/96 to 14.6.96 in the accy. Roll and other record of the office.		
09-1996	<i>ash</i>	PRINCIPAL Govt. High School Urmar Miana (Pesh)	31.10.96	Transfer	PRINCIPAL Govt. High School Urmar Miana (Pesh)	Leave			
11-96	<i>ash</i>	Principal G.H.S.S. Akberpura (Nowshera)	30/11/96	Services Verified w.e. 1/9/96 to 31/12/96 From the Accy. Roll & Other Record of This School	Principal G.H.S.S. Akberpura (Nowshera)	Leave	Services Verified w.e. 15-6-96 To 31-8-96 Office Record		
1/2 96	<i>ash</i>	Principal G.H.S.S. Akberpura (Nowshera)	26/6/97	Service terminated on 26/6/97	Principal G.H.S.S. Akberpura (Nowshera)	Leave	Service verified w.e. 1/4/96 to 25/6/97		
		Principal G.H.S.S. Akberpura Nowshera		Service terminated on 26/6/97	Principal G.H.S.S. Akberpura Nowshera	Leave	Service verified w.e. 1/4/96 to 25/6/97		

Attended

ash

ash

1	2	3	4	5	6	7	8	9	10
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant	Signature of the head of office or other officer in charge of the office	Date of termination of appointment
CT GHS Jehangira Road			Rs. 1605/- P.M			26-5-98	[Signature]	Principal G.H.S. Jehangira Road Distt: Nowshera	
CT GHS Taru Jabba			Rs. 1605/- P.M			1-12-98	[Signature]	Principal G.H.S. Jehangira Road Distt: Nowshera	
CT GHS Taru Jabba			Rs. 1605/- P.M			28-7-99	[Signature]	Principal G.H.S. Distt: Nowshera	3-11
do			Rs. 1702/- P.M			1-12-99	[Signature]	Principal G.H.S. Distt: Nowshera	2-5
do			Rs. 1993/- P.M			1-6-2000	[Signature]	Principal G.H.S. Taru Jabba Distt: Nowshera	
		Revised entry in B.P.S (9) w.e.f. 1.6.2000.		Rs. 1605 - 97 - 3060					
		Pay on 1.12.99 = Rs. 1702/-							
		3 Adv; increments on passing B.A. Exam							
		= 1702 + 291/-		Rs. 1993/-					
		Maha-mad Islam							
CT GHS Taru Jabba (NSA)			Rs. 1993/-			1.6.2000	[Signature]	Principal G.H.S. Taru Jabba Distt: Nowshera	
do			2090/-			1-12-99	[Signature]	Principal G.H.S. Distt: Nowshera	3
do			2187/-			1-12-2009	[Signature]	Principal G.H.S. Distt: Nowshera	3
		ATTENDED		G.H.S.S. Akbar Fura Nowshera					

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7 Date of Appointment	8 Signature of Government	9 Signature and designation of the head of the office or other attesting officer in columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Nature and duration of leave taken	13 Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	14 Signature of the head of the office or other attesting officer	15 Reference to recorded punishment or censure, or praise of Government
						Leave			
						Period	Government to which debitable		
			7-37 27/11/2001	Drawn No 21376, on a/c of pay & allowances for the period 7/97 to 25-5-98 (on remission of 1/4. 1605 PM except 9, 10/97)			Pay Adjustment on the high of decision of the Service Tribunal Nuzvid vide Pet dated 3/10/2001 is hereby adjusted against the vacant post of CT. vide F.D. Education, Dept. Andhra No-5049, 52 dt. 10/4/2001 we. 9-86-6-11 to 25/5/2001 for the purpose of pay		
12/22/01			01/12/2001	Revision of scale	District Accounts Officer Nowshera, P.N.			Principal Govt. High School Nizampur	
			7-189 24/1	Drawn No 50387, on a/c of pay & all. for the period 26/97 to 30/97 (5 days) and 9/97 and 10/97 (1 day) (on remission of 1/4. 1605 PM)				Principal GHSS Nizampur	
					Dist. Accounts Officer Nowshera			Principal G.H.S.S. Nizampur	
					Principal G.H.S.S. Albar Pur Nowshera			Principal G.H.S.S. Nizampur	

PRINCIPAL
G.H.S.S. Albar Pur
Nowshera

ATTESTED

[Handwritten Signature]

Service Verified w.o. 11/1/98 to 25/5/98
From Acct Roll No. ... record of the School

Principal
G.H.S.S. Nizampur

1	2	3	4	5	6	7	8	9	10
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government	Signature of officer in charge of Section 1 to 8	Duration of term of appointment
C.I.									
G.H.S. Tarkhan Jabbana	Agmt		Rs. 3280/-	P.M.		01/12/2001	ASH	Pr. G.H.S. Jabbana	30/12/01
- Do -	- Do -		Rs. 3425/-	P.M.		01/12/2002	ASH	Pr. G.H.S. Jabbana	30/12/02
- Do -	- Do -		Rs. 3570/-	P.M.		01/12/2003	ASH	Pr. G.H.S. Jabbana	30/12/03
- Do -	- Do -		Rs. 3715/-	P.M.		01/12/2004	ASH	Pr. G.H.S. Jabbana	30/12/04
Revision of pay scale BPS-09-2770-165-2220									
- Do -			Rs. 4255/-			1/05	ASH	G.H.S. Jabbana	30/12/05
- Do -			Rs. 4285/-			30/11/05	ASH	G.H.S. Jabbana	30/11/05
G.H.S. TARKHAN	- Do -		Rs. 4420/-	P/M		1/12/05	ASH	G.H.S. Tarkhan	30/12/05
Sanction accorded to the S.P.F. Advance for Rs. 22000/- vide DCO order No. 4406-07 dt. 31-8-2006									
ATTESTED								Attested PRINCIPAL G.H.S. Anbar Pura Nowshera	

J. K. S.

10

11

12

8 Signature of Government Servant	9 Nature and position of the head of office or other officer in charge of this office	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
						Period		
(50) ASD	Pri. G.H.S. Taru Jabba	30/11/2002		Pri. G.H.S. Taru Jabba (NSR)			Services Verified w.e.f. 28-7-94 to 31-12-2001 from the Acquittance Roll & Other Record of this office	
ASD	Pri. G.H.S. Taru Jabba	30/11/2003		Pri. G.H.S. Taru Jabba				
ASD	Pri. G.H.S. Taru Jabba	30/11/04		Pri. G.H.S. Taru Jabba				
ASD	Pri. G.H.S. Taru Jabba	30/05/05		Pri. G.H.S. Taru Jabba				
ASD	Pri. G.H.S. Taru Jabba			Pri. G.H.S. Taru Jabba			Adjusted for the purpose of pay for the period from 26-6-97 to 30-6-97 (5 days) and 9/97 to 10/97 (200 months) against vacant PET post at Gms. Mian Essa with 6-41402-SAPs Middle School vide ED/NSR order no. 315-18 dt 15-1-2002.	
ASD	Pri. G.H.S. Taru Jabba			Pri. G.H.S. Taru Jabba			District Officer (M) Secy: (Admn. & Dev.) Nowshera	
ASD	Pri. G.H.S. Taru Jabba			Pri. G.H.S. Taru Jabba			Service Verified w.e.f. 26.6.97 to 30.6.97 from the Acq. Roll and other record of this office	
ASD	Pri. G.H.S. Taru Jabba			Pri. G.H.S. Taru Jabba			District Officer (M) Secy: (Admn. & Dev.) Nowshera	
ASD	Pri. G.H.S. Taru Jabba			Pri. G.H.S. Taru Jabba			Service Verified w.e.f. 1.9.97 to 31.10.97 from the Acq. Roll and other record of this office.	
ASD	Pri. G.H.S. Taru Jabba			Pri. G.H.S. Taru Jabba			Services Verified w.e.f. 1-1-02 to 31-12-02 from the Acq. Roll and Other Record of this office.	

Principal
Govt. High School
Taru Jabba (NSR)

Handwritten signature

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government	9 Signature and Designation of the hearing officer or other testing officer in attestation of columns 1 to 8		
G.H.S. Nowshera	Permanent		4585			12/06	I. J. A.			
<p>OFFICE OF THE PAY FIXED IN THE PAY SCALES OF RS. 2770 - 165 - 7720 SP AT RS. 4255 P.M.W.F. With Next Increment on</p> <p>1-07-2006 1-12-2005</p>		<p>Principal Officer Pay Fixation Party N.W.F.P. Peshawar</p>	<p>Altered</p> <p>PRINCIPAL G.H.S.S. Akbar Pura Nowshera</p>	<p>OFFICE OF THE PAY FIXED IN THE REVISED BASIC PAY SCALES 2001 OF RS. 3185 - 190 - 8885 B.S. AT RS. 5275 P.M.W.F. With Next Increment on</p> <p>1-07-2007 1-12-2007</p>		<p>Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p>	<p>(A) 100/0/0/0/0/0/0/0/0/0 (B) 100/0/0/0/0/0/0/0/0/0 BT/0/0/0/0</p>	<p>B. 4585/0 P.M.</p>	<p>12/06</p>	<p>Govt. High Warkha</p>
		<p>Revised Pay Scale BPS No-09</p>		<p>PBS No-09 (3185-190-8885)</p>		<p>7/07</p>	<p>I. J. A.</p>			
		<p>P. 5875/0 P.M.</p>		<p>7/07</p>		<p>I. J. A.</p>				

ATTESTED

Pr
Govt: Warkha

8 Signature of Government	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave Nature and duration of leave taken	14 Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	15 Reference to any recorded punishment or censure or reward or praise of the Government Servant	
						Period	Government to which debitable	
								Service verified w.e.f. 1-1-2003 to 31-12-2003 from the school record.
								Principal S.M.S. Tarujabba Dist. Nowshera
								Service verified w.e.f. 1-1-2004 to 31-12-2004 from the Acquittance Roll & Other Record of office
								Principal Govt. High School Tarujabba Dist. (NSR)
								Services Verified w.e.f. 1-1-05 to 31-12-05 from the Acquittance Roll & Other Records of this office
								Principal G.H.S. Tarkha
								Services Verified w.e.f. 1-1-06 to 31-12-06 from the Acq. Roll and other office record of this School.
								Principal Govt: High School Tarkha (Nowshera)
								Principal Govt: High School Tarkha (Nowshera)
								Services Verified w.e.f. 1-1-07 to 30-6-07 from the Acq. Roll and other office record of this School.
								Principal Govt: High School Tarkha (Nowshera)

1 J.A.

11/10/06
11/10/06
On Ac/c G.P. Fund Advances

District Accounts Officer
Nowshera

11/16/06
11/16/06
On Ac/c G.P. Fund Advances

District Accounts Officer
Nowshera

38

Principal
Govt: High School
Tarkha (Nowshera)

Principal
Govt: High School
Tarkha (Nowshera)

Services Verified w.e.f. 1-1-06 to 31-12-06 from the Acq. Roll and other office record of this School.

Principal
Govt: High School
Tarkha (Nowshera)

Attested
Principal
G.H.S.S. Akbar Pura
Nowshera

Principal
Govt: High School
Tarkha (Nowshera)

Scale
Revised

Principal
Govt: High School
Tarkha (Nowshera)

Services Verified w.e.f. 1-1-07 to 30-6-07 from the Acq. Roll and other office record of this School.

Principal
Govt: High School
Tarkha (Nowshera)

ATTESTED

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant 9 Signature and name of the head of office or other officer in charge of the section of posts 1 to 8
S.H.S. Tarkha CT	Perman:	B	SUBS/P.M.	✓		1-12/07	1 Jds Prin. Govt. High Tarkha
Revised Entry in the light of BPS-15							
Pay in BPS-08 on 1-12/07 Rs. 5465/- (4350-350-14850)							
Pay Fixed in B-15 on 2-12/07 Rs. 5750/-							
Pay Revised BPS-15 (5220-420-17820)							
01/07/2008 Rs 6900/- P.M.							
<p>Principal Govt. High Tarkha</p> <p>19/49807 20/11</p> <p>17/11</p> <p>16000/-</p> <p>19/11</p>							
<p>Attested</p> <p>PRINCIPAL G.H.S.C. Akbar Pura Nowshera</p> <p>District A</p> <p>ATTESTED</p>							

7	8	9	10	11	12	13		14	15
						Nature and duration of leave taken	Leave		
							Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
							Period	Government to which debit to	
2 2	1	Principal Govt. High School Tarkha (Nowshera)	30/11/08	Govt. High School Tarkha (Nowshera)	Principal Govt. High School Tarkha (Nowshera)				Services Verified with Roll and office record of this School.
PS-15	1	Principal Govt. High School Tarkha (Nowshera)			Principal Govt. High School Tarkha (Nowshera)				Services Verified with Roll and office record of this School.
1	1	Principal Govt. High School Tarkha (Nowshera)			Principal Govt. High School Tarkha (Nowshera)				Awarded BPS-15 w.e.f 11/10/2007
1	1	Principal Govt. High School Tarkha (Nowshera)			Principal Govt. High School Tarkha (Nowshera)				Sanction with DCO MCOMS No. 14/DCO/ET/MSR/4785-91D 07/08/2008.
02	1	Principal Govt. High School Tarkha (Nowshera)			Principal Govt. High School Tarkha (Nowshera)				Services Verified with Roll and office record of this School.
1	1	Principal Govt. High School Tarkha (Nowshera)			Principal Govt. High School Tarkha (Nowshera)				Principal Govt. High School Tarkha (Nowshera)
			30/11/08						OPTION
									Some shting Ahmad et given an option for re-termination in BPS-15 under the rules 10(3) of The Pay Revision rules civil services 1978 w.e.f 2/12/07
7	20/11	Attested							TO- 134 dt 12/8/11
									Dr Professor 5165/
									arr etc of diff. 5/2/08
									due to allocation BPS-15
									w.e.f 2/12/07 to 30/7/08
									G.P.F. Sacrificed RS=39000/-
									in the name of EDO (ERS) MSR
									No. 1659 dt 15/11/08
									Principal Govt. High School Tarkha (Nowshera)

1	2	3	4	5	6	7	8	9
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature and designation of the holder of the office or other officer in Government representation of columns 1 to 8	
Ishtiaq et. G.H.S. Tankher	Perm:		Rs-732/- PM.			01.12.08		
Revised Entered in light of vide FDLPRE) 5-2002 dt 30-3-2009								
Grant of Annual Increment/Rising pay to untrained Teachers in light of Supreme Court Judgment								
Date of regular appt:- 16/10/95 Rs 1685/-								
				1-12-96	1700/-			
				1-12-97	1799/-			
				1-12-98	1896/-			
				31-3-99	1896/-		Passed Exo awarder graded	
				1-12-99	1993/-			
				1-6-2000	2284/-		Three adment	
				1-12-2000	2381/-			
				1-12-2001	2478/-			
				1-12-2001	3715/-		Pay revised TO 6	
				1-12-2002	3860/-			
				1-12-03	4005/-			
				1-12-04	4150/-			
				1-07-05	4750/-		scale revision of c	
				1-12-05	4915/-			
				1-12-06	5080/-			
				1-07-07	5845/-			
				1-10-07	6100/-		Awarder 13-05	
				1-07-08	7320/-		Pay revised	
				1-12-08	7749/-			

Attested
Principal
G.H.S. Akbar Pura
Nowshera

ATTESTED

Principal
Govt. High School
Nowshera

Govt. High School
Tankher

Principal
Govt. High School
Tankher

Sl. No.	Signature and position of the head of the office or other attesting officer in Government service	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or record of praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
2-8	Principal Govt. High School Parkha (Nowshera)	30/11/08	Normal leave	Principal Govt. High School Parkha (Nowshera)	Period	Government to which debitable	Services Verified w.e.f. 1-7-08 to 31-12-08 from the Acqy Roll and other office record of this School.	Principal Govt. High School Parkha (Nowshera)
1/15	Principal Govt. High School Parkha (Nowshera)						under taking	
1/15	Principal Govt. High School Parkha (Nowshera)						Mr. Ishfaq Ahmad et al hereby give an undertaking that any over payment made to me as a result of PD(PRS-2002) at 30-3-2009 may be deducted from any pay/ pension etc.	
1/15	Principal Govt. High School Parkha (Nowshera)							
1/15	Principal Govt. High School Parkha (Nowshera)							
1/15	Principal Govt. High School Parkha (Nowshera)							
1/15	Principal Govt. High School Parkha (Nowshera)							
1/15	Principal Govt. High School Parkha (Nowshera)							
1/15	Principal Govt. High School Parkha (Nowshera)							
1/15	Principal Govt. High School Parkha (Nowshera)							

2/16/09

under taking

Mr. Ishfaq Ahmad et al hereby give an undertaking that any over payment made to me as a result of PD(PRS-2002) at 30-3-2009 may be deducted from any pay/pension etc.

Ishfaq Ahmad

Attested by

Principal Govt. High School Parkha (Nowshera)

Attested
Principal G.H.S.S. Akbar, Pura Nowshera

SR No. 26 of 6/7/09
Voted for B-260
diff. of pay for 45/1009
on etc of untrained
Empts. to u. i. Teachers

Principal Accounts Office, Nowshera

Principal Govt. High School Parkha (Nowshera)

8/6/09

1	2	3	4	5	6	7	8	9	
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Officer in Station of	Signature and name of the head of the office or other officer in Station of	Designation of the officer in Station of
CT Post GHS	Perman		R. 2160/- PM			12/09	[Signature]	[Signature]	Principal Govt. High Sch
Tankha									
-do-	-do-		R. 8589/- PM			12/2010	[Signature]	[Signature]	Principal H.S. Tankha
			Revised Pay Scales 2011						
			(8500-700-29500) 1-7-2011						
			R. 14100/- PM			07/2011	[Signature]	[Signature]	Principal Govt. High Sch
-do-			R. 14800/- PM			12/2011	[Signature]	[Signature]	Principal Govt. High Sch
<p>OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. Peshawar Pay Verified in the A/c of 1-1-2009 in Light of the Govt. Order No. 1333-2009 with No. A/c of 1-1-2009 Pay Scale of Rs. 5220-420-2009 Pay Verified in the A/c of 1-1-2009 with No. A/c of 1-1-2009</p>			<p>Account Officer P.P. Peshawar Party N.W.F.P. Peshawar</p>			<p>Attested ML PRINCIPAL G.H.S.S Akbar Pura Nowshera</p>			
WT 774/15									
			R. 15500/- PM			12/2012	[Signature]	[Signature]	Principal Govt. High Sch
-do-			R. 15500/- PM			5-3/2013	[Signature]	[Signature]	Principal Govt. High Sch

ATTESTED
[Signature]

Principal
G.H.S.S Akbar Pura
Nowshera

7 Date of Appointment	8 Signature of Government Servant	9 Name and Designation of the head of the office or other officer in charge of the office (S. 1 to 8)	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government Servant		
12/07	[Signature]	Principal Govt. High School Tarkha (Nowshera)	30/11/07	[Signature]	Principal Govt. High School Tarkha (Nowshera)			Services Verified w.e.f. 1-1-07 to 31-12-07 from the Acq. Roll and other office record of this School.	
12/08	[Signature]	Principal G.H.S Tarkha Nowshera	30/11/2010	[Signature]	Principal G.H.S Tarkha Distt. Nowshera			Services Verified w.e.f. 1-1-2010 to 31-12-10 from the Acq. Roll and other office record of this School.	
20/11	[Signature]	[Signature]	[Signature]	pay Revised	[Signature]			Services Verified w.e.f. 1-1-11 to 30-6-11 from the Acq. Roll and other office record of this School.	
07/2011	[Signature]	[Signature]	1-7-2011	[Signature]	[Signature]			Services Verified w.e.f. 1-7-11 to 31-12-11 from the Acq. Roll and other office record of this School.	
12/11	[Signature]	[Signature]	30-11-11	[Signature]	[Signature]			Services Verified w.e.f. 1-7-11 to 31-12-11 from the Acq. Roll and other office record of this School.	
<p>OFFICE OF THE ACCOUNTANT GENERAL HYBER PAKHTUNKHWA PESHAWAR PAY FIXED IN THE R.B.P.S 2011</p> <p>800 700 29500 5</p> <p>OPRS ATRS With Next Increment on</p> <p>EM.N.F.F. 1-07-2011 1-12-2011</p>						<p>Attested Principal G.H.S Akbar Pura Nowshera</p>			
12/11	[Signature]	Principal G.H.S Tarkha Nowshera.	30/12	Transfered GMS Chusmagar (NSA) No. 848-52 dt. 5/3/2013	Principal G.H.S Tarkha Nowshera			Services Verified w.e.f. 1-1-12 to 31-12-12 from the Acq. Roll and other office record of this School.	
13/11	[Signature]	Principal G.H.S Tarkha Nowshera.		ATTESTED	Principal G.H.S Tarkha Nowshera.			Services Verified w.e.f. 1-12-2012 to 5-3-2013 from the Acq. Roll and other office record of this School.	

[Signature]

Principal
G.H.S Tarkha
Nowshera.


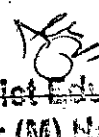




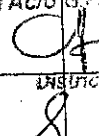
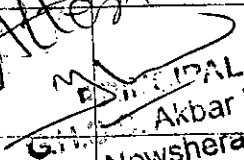

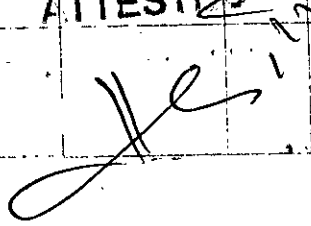
1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government	9 Signature and position of the head of office or other officiating officer in continuation of columns 1 to 8	10 Term of
GMS tahugh Magam (R/SK)			Rs 18500/- P.M			8 ⁰³ / ₀₁₃	/	District Officer ESEINowshar	
GHS Akbar pura nowshar			Rs 15500/- PM			24 ⁰⁸ / ₂₀₁₃	/	PRINCIPAL Akbar Pura	
			Rs 16200/- PM			07 ¹² / ₂₀₁₃	/		
		Remitted						Attested Principal Akbar Pura Nowshara	

Handwritten signature and initials in the lower part of the table.

20

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7	8	9	10	11	12	13		14	15
Date of Appointment	Signature and name of the head of the office or other attesting officer in Government Columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Serv
						Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Period to which debitable		
6/03/2013	 District Officer (E/SE) Nowshera	18/08/2013 District Education Officer (M) Nowshera	Reason of termination: <i>Transferred to GHS Akbar Pura</i>	 District Education Officer (M) Nowshera	Sanctioned on GPFund Adv. Amounting to Rs: 78000/- (MED) NGR No 4686-8) dt 26/8/2013	Period	Government to which debitable		
24/08/2013	 PRINCIPAL GHS Akbar Pura			 PRINCIPAL GHS Akbar Pura				 DY: District Officer (E/SE) Nowshera	
7/12/2013	 PRINCIPAL GHS Akbar Pura			No 7/11/13 Rs 7000/- on Ac/o GPFund Adv.  District Accounts Officer Nowshera				Services verified we 6/3/2013 to 23/8/13 from the Acc. Roll and others been of the School.	
				Attested  PRINCIPAL GHS Akbar Pura				 PRINCIPAL GHS Akbar Pura	
				ATTESTED 				Passed MED Exam 2012 Under RNO AG-691525 from AIOU ISLAMABAD obtained 751 Marks out of 1200 in first Division Result Declared on 14/12/12	

22

23
157

29

of int- 11	Signature of Government Servant	Signature and Title of the head of office or other Officer in charge of posts 1 to 8	Date of termination of appoint- ment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government		
							Period		
	Upgradation of KPK 5-2014 14850								
	353 Promotion 14850								
	7806								
	29500								
	1800								
	5200								
	900								

ATTESTED

Principal
GHSS Akbar Pura
Nowshera

Undertaking

I, Istiaq Ahmad of
herby give an undertaking
to this effect that if any
over payment is made to
me due to incorrect
fixation of pay the same may
be recovered from my
pay/ pension at
any time.

The Dt 8/7/14
Draught Paper No. 200
am of of pay
for 6/14 due to
promotion project -
ISTIAQ AHMAD
C.T.

Principal
GHSS Akbar Pura
Nowshera
Principal
GHSS Akbar Pura
Nowshera

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government
e-t G.H.S.S. Akbar Pura	Awarded B-16 vide	(12910-1035-43960)	FD(SO(FR)-20/2015 dt 30.6.2015				
	pay on 1-7-2015 in B-16	pre mature met		23269/-	1035/-		
	pay on 1-7-2015			24295/-		1	
	pay in B-15 on 1-12-2015			23655/-			
	pay in B-16 on 1-12-2015	pre mature met		24295	1035/-		
	pay on 1-12-2015			25330			
	ATTESTED						
	all mod 1035-16						
	SCT with 21/5/16						
	promoted to SCT vide DEO(M) NSR NO 2824-58)						
	DEO(M) ESTB/F. NO 2/promotion of e-t to SCT B-16						
	dt 21-5-2016						
	pay on 21-5-2016 on e-t	pre mature met		25330/-	1035/-		
	pay on 21-5-2016	Attested		26368			

District ar

Signature of Government

I Mr. e-t of G.H.S.S. Akbar Pura hereby to the e-t pay on 1-12-2015 me am lower to Rule 19 Option

Attested by

Signature of Government

PRINCIPAL
G.H.S.S. Akbar Pura
Nowshera

PRINCIPAL
G.H.S.S. Akbar Pura
Nowshera

(For use in Police and other similar Departments)

RECORD OF POSTINGS

Date of Appointment
 Signature of Government
 20/2015 dt 30/6/2015
 27-
 1-
 1-
 1-
 24-587
 -16
 30/5/5
 5

District and Post	No. of District Order	Date	District and Post	No. of District Order	Date
TR-70		04/6/8/14			
Order No. 2546/c					
atc of member					
TR 1366 dt. 10/10/2015					
Order No. 8561/c					
M/A of B-16					
From 7/2015 to 11/2015					
Option					
<p>I Mr, Ishfaq Ahmad C.T of G.H.S. Akbar Pura hereby give an option to the effect that my pay may be refer on 1-12-2015 after allow me annual inc in lower scale under the Rule 1978. I know that option once made is final</p>			<p>AAO AAO TR-1366 dt 10/10/2015 Am of Rs-1727 PRINCIPAL in A/c of B-16 ref G.H.S.S. Akbar Pura Nowshera 6/2015 to 11/2015 AAO TR = 168 d Drawn pay = 376 dated 2/2/16 to 2/2/16 AAO</p>		
<p>Attested by Ishfaq Ahmad C.T G.H.S.S. Akbar Pura</p>			<p>Attested PRINCIPAL G.H.S.S. Akbar Pura Nowshera</p>		
<p>Revised 30/6/2016 PRINCIPAL G.H.S.S. Akbar Pura Nowshera</p>					

ATTESTED

TR 1366 dt. 10/10/2015
 Order No. 8561/c
 M/A of B-16
 From 7/2015 to 11/2015

TR-1366 dt 10/10/2015
 Am of Rs-1727
 PRINCIPAL in A/c of B-16 ref
 G.H.S.S. Akbar Pura
 Nowshera
 6/2015 to 11/2015

TR = 168 d
 Drawn pay = 376
 dated 2/2/16 to 2/2/16

AAO

18/26

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Note: The entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

Name: ISHTIAQ AHMAD

Race:

Residence: VILL, P/O AKBAR PURA MOH, SAID
TEH, RABBI DIST, NOWSHERA

Father's name and residence:

MUSHTAQ AHMAD

Date of birth by Christian era as nearly as can be ascertained:

01-04-1976

Date


Exact height by measurement:

5-5"

Personal marks for identification:

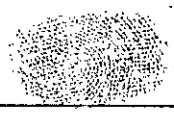
A mole on the left side of face

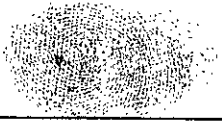
Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

Ring Finger:  ATTESTED

Middle Finger: 

Fore Finger: 

Thumb: 

Signature of Government Servant:

Attested


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

G.H.S.S. Akbar Pura
Nowshera

PRINCIPAL
G.H.S.S. Akbar Pura
Nowshera

ed back

xamination

ed.

93

4

32-27

32

1	2	3	4	5	6	7	8	9	10
Name of Post	Substantive Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant	Signature and Designation of head of the office or attesting officer with attestation of columns 1 to 8	Date of termination appointment
SCT G.H.S.S Akbar Pura		Pay scale Reversed on 1/7/16	Rs. 32520/2 Pm	BPS No 16 (15880-12800-54280)		7 01/7/16		PRINCIPAL G.H.S.S Akbar Pura (Nowshera)	
do			Rs. 33800/ P.m			12 01/12/16		G.H.S.S Akbar Pura	
do		Pay scale Reversed on 01/01/2017	Rs. 40190/ P.M.	BPS-16 (18910-15200-64510)		01/11/17			
				Attested					
				PRINCIPAL G.H.S.S. Akbar Pura Nowshera					

ATTESTED

PRINCIPAL
G.H.S.S. Akbar Pura
Nowshera

PRINCIPAL
G.H.S.S
Akbar Pura (Nowshera)

8	9	10	11	12	13		14	15	
					Leave				
to f tment	Signature of Government servant in attestation of columns 1 to 8	Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government	Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Period	Government to Which debtible		
R.R.O - 1280-54280									
7 2016		PRINCIPAL G.H.S.S. Akbarpura (Nowshera)		8/mc 30/4 2016				Service Verified w.e.f. 24-8-2015 to 30-11-2015 from the acc. roll and other records of this office	
12 2016		G.H.S.S. Akbarpura		pay scale Revised... 9/07 2017				PRINCIPAL G.H.S.S. Akbarpura (Nowshera)	
10/17								Service Verified w.e.f. 1-12-2015 to 30-11-2016 from the ... and other records of this office	
				Attested					
				PRINCIPAL G.H.S.S. Akbar Pura Nowshera					
				ATTESTED					

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 147/2018

Ishtiaq AhmadAppellant

VERSUS

Govt of KPK & Others..... Respondents

Respectively Sheweth

Written comments/reply on behalf of respondents.

Preliminary Objections

1. That the Appellant has no cause of action/locus standi to file the instant appeal.
2. That this honorable service tribunal has got no jurisdiction to entertain the present appeal.
3. That the present Appeal is bad for non-joinder and mis joinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this Honorable Tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is barred by law.

On Facts

1. Pertain to record.
2. Correct subject to proof.
3. Incorrect. According to the Finance Department (Regulation Wing) Notification No. FD (PRC) 5-2/2002 dated Peshawar the.30-10-2009 the services of all those untrained teachers who were appointed on fix pay and were subsequently regularized against their psots, on acquiring / completing requisite training successfully, would be entitled for such benefits of annual increment from the date of their first appointments as such, but without arrears. In the light of the above the appellant is not entitled for arrears.
4. Incorrect.
5. No Comments.

GROUND:

(2)

- A. Incorrect. The appellant was treated in accordance with law.
- B. Incorrect. There is clear direction/notification of the Finance Department regarding payment/nonpayment of arrears (Annexure A).
- C. Correct, but the Court Judgment is to the extent of payment from date of training/professional qualification.
- D. Incorrect. As explain in the above para.
- E. Incorrect. The appellant was also treated in the light of notification dated 30-10-2009.
- F. Incorrect. As explained in the above para's.
- G. Incorrect. As per paras above.
- H. Incorrect. The appellant was not discriminated.

It is therefore, requested before your Honor that the present Service Appeal is illegal, against facts and without force, may kindly be dismissed with cost.

Respondent No.1

Secretary E & SE
Govt of KPK Peshawar

Respondent No.2


Director
(E & SE) KPK Peshawar

Respondent No.3


District Education Officer (M)
Nowshera

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 147/2018


Ishtiaq AhmadAppellant

VERSUS

Govt of KPK & Others..... Respondents

AFFIDAVIT

I Fayaz Hussain, District Education Officer (M) Nowshera do solemnly affirmed and declare on oath that the contents of Par wise comments/ reply on behalf of respondent are true and correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.


Deponent



GOVERNMENT OF N.W.F.P
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD (PRC) 5-2 /2002
Dated Peshawar the: 30-10-2009

To:

The Secretary to Govt. of NWFP,
Elementary & Secondary Education Department,
Peshawar.

Subject:

GRANT OF ANNUAL INCREMENT / RUNNING PAY TO
UNTRAINED TEACHERS IN THE LIGHT OF SUPREME
COURT JUDGMENT.

Dear Sir,

I am directed to refer to this Department letter No.FD (PRC) 5-2/2002, dated 30-03-2009 on the subject noted above and to say that certain quarters have raised some queries about the subject matter which are clarified as under:-

- i. All those untrained teachers who were appointed on fix pay and were subsequently regularized against their posts, on acquiring / completing requisite training successfully, would be entitled for such benefits of annual increments from the date of their first appointments as such, but without arrears.
- ii. The above benefit would also be admissible to all those retired teachers who fulfil the above conditions.
- iii. The above benefit would not be admissible to those who themselves resigned, or were removed / terminated from service.

2. This Department letter of even number dated 30-03-2009 shall be deemed to have been modified to the above extent.

Yours Faithfully,

(SHAUKAT ULLAH)
SECTION OFFICER (SR-1)

Endst: of even No. & date.

Copy for information and necessary action:-

1. Accountant General, NWFP.
2. All District Coordination Officers, NWFP.
3. All District / Agency Accounts Officers, NWFP / FATA.

SECTION OFFICER (SR-1)

(9)

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar.

No. 2296 /A-88/KC/SET(M&F)SL/Inform:

Dated Pesh: the 31/8 /2012

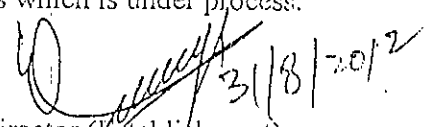
To

The Executive Distt: Officer
Elementary & Secondary Education Peshawar

SUBJECT: - Guidance for the preparation of seniority lists/promotion/upgradation of various cadres of teaching staff in Distt: Peshawar.

I am directed to refer to your letter No. 11005 dated 23-8-2012 on the subject noted above and to inform you as under:-

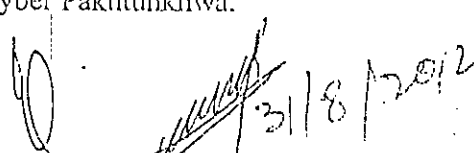
1. The seniority cannot be considered from the date of appointment as untrained teacher. The seniority is considered from the date of regular appointment post or from the date of passing the prescribed professional qualification in case of untrained appointment (copy of the Rules attached).
2. The name of the teacher transferred from one district cadre post to other Distt: cadre post on his own request will be placed at the bottom of the seniority list i.e according to the date of taking over charge after the date of issue of his inter Distt: transfer order.
3. The name of the untrained teacher cannot be enlisted in the seniority list unless he passes the prescribed professional qualification.
4. The seniority of the teacher who was transferred to his own District due to devolution of Divisional Directorate will not be disturbed.
5. The new upgraded posts i.e BPS-14, BPS-15 & BPS-16 will be filled by promotion etc as & when the new Service Rules are notified by the Govt: of Khyber Pakhtunkhwa. The notification for constitution of DPC will be issued soon after the new Service Rules.
6. The ACRs/PERs are not required in fixation of pay due to upgradation of scales of PST/Qari teachers (M&F) in BPS 12 as well as upgradation of scale of CT/DM/PET/AT/TA teachers (M & F) in BPS-15. The ACRs will be required for their promotion in next scale against the newly upgraded posts in BPS-14, BPS-15 & BPS-16.
7. The new service rules/ amendment are under process.
8. Before the Service Recruitment Rules 2011, the teachers having FA & F.Sc (in 3rd division) already appointed according to the prescribed rules at that time, will be considered for seniority, but their promotion against the newly upgraded posts will be considered if allow the new Service Recruitment Rules which is under process.


31/8/2012
Deputy Director (Establishment)
(E&S) Khyber Pakhtunkhwa Peshawar

Endst: No. 2297-2322

Copy forwarded for information & necessary action to the:-

1. All the Executive Distt: Officer (E&SE) in Khyber Pakhtunkhwa.
2. PS to the Secretary to Govt: E&SE Department Khyber Pakhtunkhwa.
3. PA to the Director E&SE Khyber Pakhtunkhwa


31/8/2012
Deputy Director (Establishment)
(E&S) Khyber Pakhtunkhwa Peshawar

VAKALAT NAMA

NO. _____/20

IN THE COURT OF KP Service Tribunal, Peshawar.

Ishfaq Ahmad.

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Edo Dept.

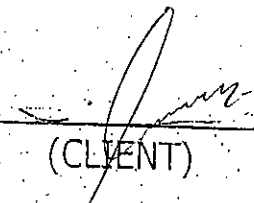
(Respondent)
(Defendant)

I/We, Ishfaq Ahmad.

Do hereby appoint and constitute **SYED NOMAN ALI BUKHARI Advocate High Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.


I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20



(CLIENT)

ACCEPTED


SYED NOMAN ALI BUKHARI
Advocate High Court Peshawar.