


FORM OF ORDER SHEET

Court of _____

Appeal No. 1532/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/07/2023	<p>The appeal of Mr. Faisal Shahzad Hussain received today by registered post through Mr. Abdur Rauf Chohan Advocate. It is fixed for preliminary hearing before touring Single Bench at A. Abad on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL CAMP COURT, ABBOTTABAD**

Service Appeal No. 1532/2023

محمد احسان قاضی ولد عبدالحق (CT) سی ٹی (BPS-15) گورنمنٹ ہائر سیکنڈری سکول نمبر 3 تحصیل و ضلع ایبٹ آباد۔

موبائل نمبر: 0345-9594479 Email: ihshanqazi345@gmail.com

۔۔ اپیلانٹ

بناہ

گورنمنٹ آف خیبر پختونخواہ بذریعہ ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ، پشاور وغیرہ

۔۔۔ رسپانڈنٹس

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المراقوم: /07/2023

محمد احسان قاضی (CT) (BPS-15)۔۔۔ اپیلانٹ

بذریعہ وکیل:

عبدالرؤف چوہان

ایڈوکیٹ ہائی کورٹ ایبٹ آباد

0347-3146975

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT,
ABBOTTABAD

Service Appeal No. 1532/2023

محمد احسان قاضی ولد عبدالحق (CT) سی ٹی (BPS-15) گورنمنٹ ہائر سیکنڈری سکول نمبر 3 تحصیل ضلع ایبٹ آباد۔

موبائل نمبر: 0345-9594479 Email: ihshanqazi345@gmail.com

۔۔ اپیلانٹ

بنام

- (1) گورنمنٹ آف خیبر پختونخواہ بذریعہ ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ، پشاور۔
- (2) ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ایلمنٹری اینڈ سیکنڈری ایجوکیشن ضلع ایبٹ آباد۔
- (3) ڈسٹرکٹ اکاؤنٹ آفیسر ضلع ایبٹ آباد۔

۔۔۔ ریسپانڈنٹس

APPEAL U/S-4 OF KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT- 1974, AGAINST THE
ILLEGAL DEDUCTION OF FOURTH ADVANCE
INCREMENT OF THE APPELLANT W.E.F
01.07.2011 BY THE RESPONDENTS WHICH
WAS RELEASED IN THE LIGHT OF
NOTIFICATION DATED 11.08.1991 ISSUED BY
FINANCE DEPARTMENT GOVERNMENT OF
(NWFP) NOW KHYBER PAKHTUNKHWA
PESHAWAR.

PRAYER:

IT IS RESPECTFULLY PRAYED THAT
RESPONDENTS MAY PLEASE BE
DIRECTED TO RESTORE THE 04th
ADVANCE INCREMENTS OF B.A ISTEAD
OF AND ADVANCE INCREMENT
/RECOVERY OF PAYMENT (ROP) WHICH
ALREADY DEDUCTED / RECOVERED
PREVIOUSLY MAY BE REIMBURSED TO
APPELLANT WITH ALL BACK BENEFITS.
ANY OTHER RELIEF FOR WHICH THE
APPELLANT IS ENTITLED AND SAME IS
NOT ASKED /PRAYED SPECIFICALLY
MAY KINDLY BE GRANTED IN THE
FAVOUR OF THE PETITIONER TOO.

Respectfully Sheweth:

(FACTS)

-1 یہ کہ اپیلانٹ کی تقرری محکمہ تعلیم ضلع ایبٹ آباد میں PST پوسٹ پر گریڈ 7 میں مورخہ
14-03-1995 کو ہوئی اور بوقت تقرری PST پوسٹ کی بنیادی قابلیت میٹرک تھی اب اپیلانٹ
گورنمنٹ ہائر سکول نمبر 3 ضلع ایبٹ آباد میں CT پوسٹ پر گریڈ 15 میں اپنے فرائض سرانجام دے رہا

2- یہ کہ اپیلانٹ کو HSSC کا امتحان 2nd ڈویژن پاس کرنے کی بناء پر اپیلانٹ کو گریڈ 9 میں ترقی دے دی گئی۔

3- یہ کہ اپیلانٹ نے B.A کا امتحان یونیورسٹی آف پشاور سے رول نمبر 20283 کے تحت سال 1998ء میں 2nd ڈویژن میں پاس کیا۔

(B.A کی ڈگری کی کاپی لف ہے "A" Annexure)

4- یہ کہ محکمہ فنانس حکومت (NWFP) خیبر پختونخوا نے مورخہ 11-08-1991 کو نوٹیفکیشن نمبر 1-1/89 FD (PRC) جاری کیا جس میں اعلیٰ تعلیم حاصل کرنے پر ایڈونس Increment جاری کرنے پر مکمل وضاحت کی اور اس میں سفارش کی گئی کہ وہ تمام پوسٹیں جنکی بنیادی قابلیت میٹرک ہے ان کو B.A، (BSC) کی ڈگری حاصل کرنے پر چار ایڈونس اینکریمنٹ جاری کیے جائیں گے۔

(نوٹیفکیشن محررہ 11-08-1991 کی کاپی لف ہے "B" Annexure)

5- یہ کہ اپیلانٹ کی تقرری PST پوسٹ پر ہوئی جسکی بنیادی قابلیت میٹرک تھی اور B.A کی ڈگری کے حصول پر اپیلانٹ نوٹیفکیشن مورخہ 11-08-1991 کی روشنی میں چار ایڈونس اینکریمنٹ کا حقدار تھا۔ اپیلانٹ کو B.A کی ڈگری حاصل کرنے کی بنیاد پر پہلے تین ایڈونس اینکریمنٹ دی گئی پھر چوتھی اینکریمنٹ بھی دے دی گئی مگر 01-07-2011 سے اپیلانٹ سے چوتھی اینکریمنٹ واپس لے لی گئی اور اپیلانٹ پر چوتھی اینکریمنٹ کی Recovery بھی ڈال دی گئی۔ جسکی تفصیل اپیلانٹ کی سروس بک میں موجود ہے۔

(اپیلانٹ کی سروس بک کے متعلقہ اوراق کی کاپی لف ہے "C" Annexure)

6- یہ کہ اپیلانٹ نے مورخہ 11-04-2023 کو رسپانڈنٹ نمبر 1 کو غیر قانونی طور پر چوتھی ایڈونس اینکریمنٹ واپس لینے کے خلاف محکمانہ اپیل بھی کی جس پر تا حال کوئی فیصلہ نہیں ہوا۔

(محکمانہ اپیل 11-04-2023 کی کاپی لف ہے "D" Annexure ہیں)

GROUND

-A یہ کہ رسپانڈنٹس نے اپیلانٹ سے چوتھی ایڈوانس اینکریمنٹ واپس لینے سے پہلے اپیلانٹ کو کوئی لیگل نوٹس یا شو کاز نوٹس جاری نہیں کیا جو کہ خلاف قانون ہے اور اپیلانٹ کے بنیادی حقوق کو غصب کرنے کے مترادف ہے رسپانڈنٹس کا مذکورہ بالا فعل سراسر غلط، خلاف قانون، خلاف واقعات اور اپیلانٹ کے حقوق پر بے اثر ہے۔

-B یہ کہ رسپانڈنٹس کا ایڈوانس اینکریمنٹ کا واپس لینا آئین پاکستان 1973ء کی سیکشن 25 کے صریحاً خلاف ہے۔

-C یہ کہ نوٹیفکیشن مورخہ 11-08-1991 جاری کردہ محکمہ فنانس پشاور ایڈوانس اینکریمنٹ کے مطابق بالکل واضح ہے اور رسپانڈنٹس کا رویہ ہمراہ اپیلانٹ مذکورہ نوٹیفکیشن کی روشنی میں صریحاً خلاف قانون ہے۔

-D یہ کہ اپیلانٹ سے چوتھی اینکریمنٹ واپس لینا Locus Poententia Law کے صریحاً خلاف ہے کیونکہ اس لاء کی روشنی میں حکومت / محکمہ جب کسی ملازم کو کوئی Benefit دے دے تو اس ملازم سے اس ریلیف اور Benefit کو واپس نہیں لے سکتی۔

-E یہ کہ اپیلانٹ سے ایڈوانس اینکریمنٹ غیر قانونی طور پر واپس لینا اور ریکوری ڈالنا اعلیٰ عدالتوں کے فیصلوں کے صریحاً خلاف ہے۔

-F یہ کہ اپیلانٹ چوتھی ایڈوانس اینکریمنٹ اور اسکے بقایا جات کے حصول کا حقدار ہے اور اپیلانٹ کا حق غصب کر کے اُسے ذہنی و دماغی طور پر تار چر کرنا ہے۔

G- یہ کہ اپیلانٹ نے متعدد دفعہ رسپانڈنٹس کو درخواستیں دیں جن پر کوئی کارروائی عمل میں نہ لائی گئی اور اپیلانٹ آنے میں بہت سے اخراجات صرف ہوئے اور اپیلانٹ کا قیمتی وقت ضائع ہوا۔

H- یہ کہ اپیل ہذا اندر معیاد ہے۔

استدعا:

لہذا استدعا ہے کہ اپیلانٹ کی اپیل منظور فرماتے ہوئے نوٹیفیکیشن مورخہ 11-08-1991 کی روشنی میں محکمہ کو ہدایت جاری کی جائیں کہ وہ اپیلانٹ کی چوتھی ایڈوائس اینٹکریمینٹ کو بحال کریں اور اسکے بتایا جات بھی ادا کریں۔

المرقوم: 07/2023

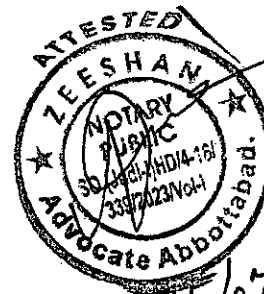
محمد احسان قاضی (BPS-15) CT۔۔۔۔ اپیلانٹ

بذریعہ وکیل:

عبدالرؤف چوہان

ایڈووکیٹ ہائی کورٹ ایبٹ آباد

0347-3146975



15/07/2023

بیان حلفی:

حلفاً بیانی ہوں کہ جملہ مراتب اپیل تا حد علم و یقین میرے صحیح و درست ہے نیز کوئی امر ٹریبونل ہذا سے مخفی نہ رکھا گیا ہے۔ اور اپیلانٹ نے ما قبل کسی بھی عدالت یا ٹریبونل سے اس بابت اپیل یا پٹیشن دائر نہیں کی۔

المرقوم: 07/2023

محمد احسان قاضی (BPS-15) CT۔۔۔۔ اپیلانٹ

ANNEXURE
A



University of Peshawar (Pakistan)

Session ANNUAL, 1998

MOHAMMAD INSAN QAZI SON of ABDUL KHALIQ and a student
of DISTRICT ABBOTTABAD having passed the prescribed
examination held in AUGUST, 1998 is this day admitted by the University
of Peshawar to the Degree of
Bachelor of Arts
in the SECOND Division

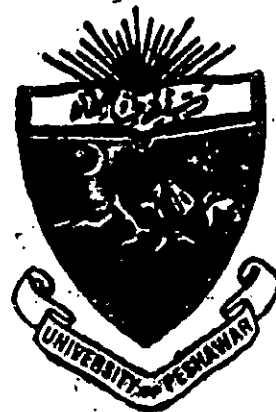
The examination was taken as ~~xxx~~ whole / in parts.

Serial No. 061838

Registration No. 96-PS-6040

Roll No. 89681

Result declared on 28TH DECEMBER, 1998



M. Javed Khan
Registrar

Countersigned

[Signature]
Vice-Chancellor

Annexure B,

A copy of Finance Department, Government of NWFP circular letter No. FD(PRC)1-1/89, dated 11th August, 1991 addressed to all the Administrative Secretaries in NWFP and others.

①

②

ANNEXURE

B

Subject: - REVISION OF BASIC PAY SCALES AND FRINGE BENEFITS OF CIVIL EMPLOYEES (BPS-1-15) OF THE PROVINCIAL GOVERNMENT (1991).

Sir,

I am directed to refer to the subject noted above and to say that the Governor, NWFP has been pleased to sanction Revision of the Basic Pay Scales for the Provincial Civil Servants (BPS-1-15) as detailed in the following paragraphs:-

2. BASIC PAY SCALES:-

The existing, modified and revised Pay scales are detailed in the annexure to this letter. The revised pay scales shall replace the Basic Pay Scales, 1987 and shall be effective from the 1st June 1991.

3. INITIAL FIXATION OF PAY.

i) The initial pay of the existing employees who have been in Government Service since before the 1st June, 1991, shall first be fixed in the modified scale at the stage having the same pay or if there is no such stage at the next higher stage. Thereafter the pay shall be fixed in the Revised Pay Scale "on point to point basis" i.e. at the stage in the relevant revised basic pay scale which is as many stages above the stage occupied by him above the minimum of the modified basic scale.

ii) In the case of those employees whose pay is fixed in the revised scale at a stage which gives less than Rs. 100/- increase in pay of May, 1991 a minimum increase of Rs. 100/- in pay over May, 1991 level, would be allowed and thereafter pay fixed at the corresponding stage equal to this pay or if there is no such stage at the next higher stage. The pay fixation formula has been illustrated through examples I, II & III in Appendix.

iii) The annual increment shall continue to be admissible subject to the existing conditions on the 1st of December each year.

iv) The increases allowed since 1-7-1988, as detailed below shall cease to be admissible from 1-6-1991:-

a) Indexed pay sanctioned vide Finance Department circular No. FD(PRC)1-3/85 dated 4-8-1988.

Contd....2/-

Amir Hussain
Attested

- b) Adhoc increase of 5% of pay sanctioned vide circular No.FD(PRC)1-3/85,dated 13-1-1990.
- c) Adhoc increase of 10% sanctioned vide Finance Department circular No.FD(PRC)1-3/89 dated 21-7-1990.
- d) Dearness Allowance of Rs.200/-P.M. sanctioned vide Finance Department circular No.FD(PRC)1-3/89,dated 16-1-1991.

4. FIXATION OF PAY ON PROMOTION.

- i) In cases of promotion from a lower to higher post/scale before the introduction of these scale pay of the employee concerned in the revised scale may be fixed and so enhanced that it would not be less than the pay that would have been admissible to him if his promotion to the higher post/scale had taken place after the introduction of these scales.
- ii) Government employees who are allowed selection grade shall be granted one premature increment from 1-6-1991 as is allowed in the case of promotion.

5. GRANT OF ADVANCE INCREMENTS TO OFFICIALS FOR POSSESSING/ATTAINING HIGHER EDUCATIONAL QUALIFICATION.

1) From 1-6-1991 onwards advance increments shall be allowed without the condition of the 'Second Division' to the officials in BPS-1-15 for possessing or acquiring higher educational qualifications over and above prescribed qualifications in the relevant recruitment Rules to the extent given below:-

Attested

	No. of Advance increments for obtaining			
	Matric.	F. A/T. Sc.	B. A/B. Sc.	M. A./M. Sc.
a) Where the prescribed qualification is Non-Matric.	2	4	6	8
b) Where the prescribed qualification is Matric.	Nil.	2	4	6
c) Where the prescribed qualification is F. A/ F. Sc.	Nil.	Nil.	2	4
d) Where the prescribed qualification is B. A./ B. Sc.	Nil.	Nil.	Nil.	2

The advance increment already allowed in terms of Para-6(a) of Finance Department's letter No.FD(PRC)1-1/87 dated 22-5-1987 shall be doubled from 1-6-1991.

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ii) The advance increments shall be allowed at the time of recruitment or acquisition of higher qualification whichever is later. In cases where the employee is already at the maximum of the scale, he may be allowed the number of advance increments beyond the maximum of the scale as personal pay to be absorbed at the time of his movement/promotion. Those employees who had acquired higher qualification in 3rd Division prior to 1-6-1991 and were not granted advance increments earlier would henceforth be allowed advance increments with effect from 1-6-1991.

6. MOVY-OVER.

The concession of Move-over shall be available from 1-6-1991 onwards to those who are enjoying selection grade.

7. SPECIAL PAYS.

The existing Special Pay admissible to various categories of Personal Assistants in BPS-15 shall be revised from 1-6-1991 as under:-

NAME OF POST.	EXISTING RS. PER MONTH.	REVISED RS. PER MONTH.
P.A. to Minister.	100	150
P.A. to Chief Secretary/ Addl: Chief Secretary/ Secretaries/Additional Secretaries.	75	120

8. TEACHING ALLOWANCE.

The existing rate of teaching allowances admissible to qualified teachers of High Schools who teach Science subjects of Physics, Chemistry, Biology and Mathematics and Junior Instructors in Poly-technic shall be enhanced as under:-

- a) For High School Science Teachers. From 100/-P.M. to Rs.200/-P.M.
- b) For Junior Instructors in Poly-technic who possess Technical Teachers Diploma. From Rs.100/-P.M. to Rs.200/-P.M.

9. MEDICAL ALLOWANCE.

The existing rate of Medical Allowance of Rs. 50/-P.M. admissible to the employees in BPS-1-15.

Handwritten signature and stamp:
Attested

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10. a) MESSIN /DIET ALLOWANCE.

The existing rate of messing/diet allowance for Nursing Cadre(below BPS-16 shall be enhanced from Rs.300/- to Rs.500/-.

b) UNIFORM ALLOWANCE.

The existing rate of uniform allowance for Nursing Cadre(below BPS-16)shall be enhanced from Rs.125/- P.M. to Rs.150/-P.M.

c) NIGHT DUTY ALLOWANCE.

The Night Duty Allowance shall be admissible as under:-

- i) For Assistants/Clerks. ...Rs.8/-per night.
- ii) For Staff Car Drivers/ Despatch Riders. ...Rs.4/-per night.
- iii) For Naib Qasid. ...Rs.3/50 per night.

d) WASHING GRANT/ALLOWANCE ADMISSIBLE TO LIVERIED STAFF.

The existing rates of Washing Grant/ Allowance shall be enhanced from Rs.25/-per month to Rs.30/-per month.

e) CONVEYANCE CHARGES FOR LATE SITTING AFTER OFFICE HOURS.

The existing rates of Conveyance Charges admissible to employees in BPS.1 to 16(Non-Gazetted) shall be enhanced as under:-

i) ON WORKING DAYS.

- For officials in BPS 1-2. From Rs.3.50 per d to Rs.4.50 per day
- For officials in BPS 3-15 B-16(Non-Gazetted). From Rs.4.50 per to Rs.5.50 per da

(ii) ON CLOSED HOLIDAYS)

- For officials in BPS 1-2. From Rs.4.50 per d to Rs.5.50 per day
- For officials in BPS 3-15 B-16(Non Gazetted). From Rs.7.00 per d to Rs.8.00 per day

Your obedient servan

Sd/-
(GHULAM DASTAGIR A
DEPUTY SECRETARY(REG:)
FINANCE DEPARTMENT.

....

.....2/-

27023... Result declared on 9-5-2002
 from Peshawar University Session 28-72
 2nd Div obtained under R.No 28-72
 31-3-2002

By D.O.M.D
 Sae A.Abed

(For use in Police Department only)

11

ANNEXURE C

Passed SSE Examination from BISE
 Heirs, Abbottabad Under R.No. 2742 securing
 567/850 in Session 1991 (Annual).
 Placed in grade - B (1st Division).

- 1.
- 2.
- 3.

Verified by the concerned Board
 No. 4197-4198 dt 17/8/17

Sub. Divisional Edu. Officer (ED)
 Abbottabad

Verification Roll No. dated *17/8/17* received back

② Passed Inter Examination from BISE
 Abbottabad during Session 1994 (Supplementary)
 Under R.No. 6450 securing 574/1000 marks
 in 2nd Division.
 Left thumb impression.

Verified by the concerned

Board No. 4197-4198
 dated 17/08/17

Sub. Divisional Edu. Officer (ED)
 Abbottabad

Qualification

Date

Qualifications

Date

Passed C.T. Exam from Serhad
 University of Science & Information Technology
 English
 Peshawar in Fall 2016, under Roll No 16-SE-00385
 marks obtained 840 out of 1100, placed in 1st
 Division. Result declared on 16-5-2017.

Urdu

P.T.C Certificate verified by the
 Asstt. Director, G.I.P. at BISE, P.
 Plan-drawing
 No. 3363 dt 17/12/2018

Finger print

Drill instructing

Court duties

Reserve duties

③ Passed P.T.C Examination
 from Govt. College of Edu. for
 Elementary teachers (Muz) Haveli
 Under R.No. 947 securing
 B.L. or B.A.
 729/1000 marks in 1st Division.
 Result declared on 9-1-1995.
 Pledership examination

Sub. Divisional Edu. Officer (ED)
 Training School Final Examination
 Abbottabad

Other qualifications

④ Passed BA from University
 of Peshawar under R.No. 89681
 obtaining 386/550 marks and
 placed in 2nd div. Result
 declared on 25-12-98

⑤ Passed B.E. d from University of Peshawar
 Under R.No. 6533 during session 2000-01
 563/1000 (2nd Div) Result declared on 25/12/01

S.D.O. (ED)
 Abbottabad

Sub. Div. Edu. Officer (ED)
 Abbottabad

C-392121
3

10597
108497

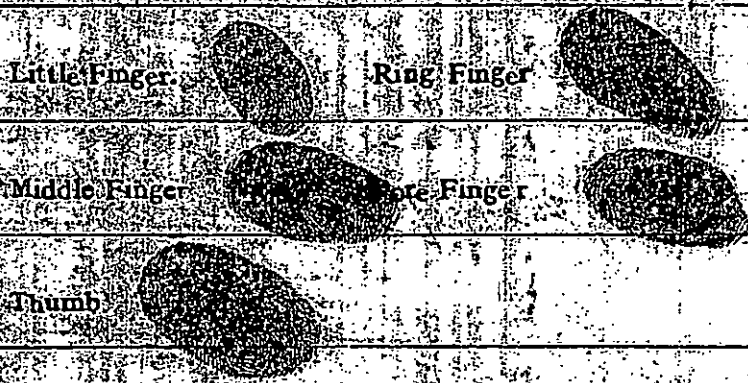
Note - The entries in this page should be renewed or re-attested at least every five years and the signature in lines 9 and 10 should be dated.

1. Name Mohammad Ihsan Qazi
2. Race Awan
3. Residence House No. Kh-1104, Mohallah Khola Kehal, Abbottabad.

4. Father's name and residence Abdul Khaliq
5. Date of birth by Christian era as nearly as can be ascertained 27-07-1974 (Twenty seventh of July A.H. 1435 nearly plus)

6. Exact height by measurement 5-6
7. Personal marks for identification A Mole on the right side of Nose

8. Left hand thumb and finger impression of (non-gazetted) officer



9. Signature of Government servant Mohammad Ihsan Qazi

10. Signature and designation of the Head of the Office or other Attesting Officer
[Signature]
Ins. Divisional Officer (24) Abbottabad

1	2	3	4	5	6	7	8
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
PTC GDS Dhakki Maister	Offi.	BPS 1105-97-3060	1605/-			11-4-95	Mohammad Hassan
GMS Banhoti	-Do-		Rs 1605/-			24-9-95	Mohammad Hassan
-Do-	-Do-		Rs 1702/-			1-12-95	Mohammad Hassan
GMS Balquias Town	-Do-		Rs 1702/- PM			11-9-95	Mohammad Hassan
GDS x/ob A. Ahal	Do		Rs 1799/- PM			1-12-96	Mohammad Hassan
-do-	-do-		Rs 1896/- PM			1-12-97	Mohammad Hassan
-do-	do		Rs 1993/- PM			1-12-98	Mohammad Hassan
-do-	do		2284/-			28-12-98	Mohammad Hassan
-do-	-do-		Rs-2381/-			1-12-99	Mohammad Hassan
-do-	-do-		2478/-			1-12-2000	Mohammad Hassan
-do-	-do-	Pay in Corresp. Scale of 2410-145-6760	2575/-			1-12-2001	Mohammad Hassan
			3860/-				

(3) BSA
 Office of the Accounts General
 Peshawar,
 issued in the revised basic pay scales 2001
 2410-145-6760
 3860/- PMWEP
 1-12-2001
 1-12-2000
 Accounts Officer
 Peshawar

Signature of other Government servant in color

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9	10	11	12	13		14	15
				Leaves			
Signature and designation of the officer or other attesting officer in attestation 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	Allocation of period of leave on average pay upto four months for which leave salary is debitable 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 debitable		
S.D.E.O. (M) Abbottabad	23/9/95	Transferred	S.D.E.O. (M) Abbottabad		Appointed as a P.T.C. at S.No. 30 vide D.E.O. (M) Primary Abbottabad Office Order Issued Under Enclote No 7-2-826 of 14-3-1995.		
S.D.E.O. (M) Abbottabad	30/11/96	Transferred	S.D.E.O. (M) Abbottabad			Sub. Divisional Officer (M) Abbottabad	
S.D.E.O. (M) Abbottabad	30/11/97	A/Snr	S.D.E.O. (M) Abbottabad		Granted P.T.C. vide 11-4-95 vide D.E.O. (M) Primary Abbottabad NO 3288 of 17-10-95.		
S.D.E.O. (M) Abbottabad	30/11/97	A/Snr	S.D.E.O. (M) Abbottabad		74330	Sub. Divisional Officer (M) Abbottabad	
S.D.E.O. (M) Abbottabad	30/11/97	A/Snr	S.D.E.O. (M) Abbottabad		74330	Sub. Divisional Officer (M) Abbottabad	
S.D.E.O. (M) Abbottabad	30/11/97	A/Snr	S.D.E.O. (M) Abbottabad		74330	Sub. Divisional Officer (M) Abbottabad	
S.D.E.O. (M) Abbottabad	30/11/97	A/Snr	S.D.E.O. (M) Abbottabad		74330	Sub. Divisional Officer (M) Abbottabad	
S.D.E.O. (M) Abbottabad	30/11/97	A/Snr	S.D.E.O. (M) Abbottabad		74330	Sub. Divisional Officer (M) Abbottabad	

A. Abbas

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. B.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature of Government servant	Signature of Head of Office
Entries Revised due to altered 4th pay/bandment of BA								
B-9-1625-97-3060			1993-00			1-12-98	John	
4. Adv/bandment of BA			2381-00	2284		28-12-98	John	D.
			2478-00	2381		1-12-99	John	
			2575-00	2478		1-12-2000	John	
			2672-00	2575		1-12-01	John	
B-9-2410-115-6760			4005-00	3860		1-12-01	John	
			4150-00	4005		1-12-02	John	D.I.
			4295-00	4150		1-12-03	John	A.
			4440-00	4295		1-12-04	John	
B-9-2770-165-7720			5080-00	4915		1-7-05	John	
			5245-00			1-12-05	John	
			5410-00			1-12-06	John	
B-9-3185-190-9985			6225-00	6057		1-7-07	John	D.D.
B-9-3630-260-11430			6230-00			1-10-07	John	A.
			6490-00			1-12-07	John	
			7765-00	7455		1-7-08	John	
			8075-00	7765		1-12-08	John	D.O.
			8385-00	8075		1-12-09	John	A. Abs
			Rs 8695 pm	8385		1-12-10	John	By
			Rs 14000 pm			01-07-11	John	CM
			13500/12					
SPS No 16/11/2011			R 14000/12 pm			1-12-2011	John	By: D.
			R 14500/12 pm			1-12-2012	John	(M) AT

Baseline of Rs. 80000/-
 on A/C No. Fund Adv. under
 Rule 117 of the K. Fundable/
 Non-Reg. Fund vide
 D.O. (M) A. Abad

No. 11583 D.O. (M) A. Abad

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitiable to another Government		
Signature and designation of the head of the office or other authority in column 1 to 8	Date of termination of period of leave	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	Allocation of period of leave on average pay upto four months for which leave salary is debitiable to another Government	Signature of the head of the office or other attesting officer	Reference to any records/punishment or censure or award or prize of the Government or Service
D.O. (M) A. Abad							
							Approved & Adv. Incentive 10 BA vide No. KC CSC-1 2-23/2009 dt 3-12-2009
							D.O. (M) A. Abad
D.O. (M) A. Abad							
D.O. (M) A. Abad							
D.O. (M) A. Abad	30-11-2010	None	Dy. Distt. Officer (M) P.S. & L. A. Abad				Drawn over of Pay & Allowance was Rs. 11,99/- to 31-10-10
D.O. (M) A. Abad	30-11-2010	None	Dy. Distt. Officer (M) P.S. & L. A. Abad				Due to allowed B.G.S. Adv. amount amounting to Rs. 2309.07 of BA
D.O. (M) A. Abad	30-11-2010	None	Dy. Distt. Officer (M) P.S. & L. A. Abad				Services verified from 01-12-09 to 30-11-2010 from the Acq. Rolls and other office record
D.O. (M) A. Abad	30-11-2010	None	Dy. Distt. Officer (M) P.S. & L. A. Abad				
D.O. (M) A. Abad	17-5-2013	None	S.D.O. (M) A. Abad				Service verified from dt. 10-11-2011 from The Acq. Rolls & other office record

Rs. 160/-
 9/11/10

Services verified from 01-12-09 to 30-11-2010 from the Acq. Rolls and other office record

Service verified from dt. 10-11-2011 from The Acq. Rolls & other office record

Dy. Distt. Officer (M) P.S. & L. A. Abad

Dy. Distt. Officer (M) P.S. & L. A. Abad

I Mr. Muhammad Iqbal SPST GPS BPS No. 6 give undertaking to the effect that if any over payment as a result of promotion in BPS 14 made to me it may be recovered from my pay/ pension Gratuity etc.

C/S
SDEO

Signature [Signature]

Name of post	Whether substantive or officiating and whether permanent or temporary	State (i) substantive appointment or (ii) whether service counts for pension under Act 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 Head of Office
<p>BASIC PAY SCALES 2011 OFFICE OF THE ACCOUNTANT GENERAL HYDERABAD, KHWA PESHAWAR PAY FIXED IN THE R.G.P.S 2011</p>								
<p>GERS <u>7,000 - 500 - 22,000</u></p>								
<p>ATRS <u>23,500</u> P.W.F. <u>1-07-2011</u> to <u>1-12-2011</u> With Next Increment on <u>[Signature]</u></p>								
<p>Account's Office, Pay Fixation Party, K Pakhtunkhwa, Peshawar</p>								
<p><u>[Signature]</u></p>								
<p>SPST BPS 14 (8000 - 6100 - 26300)</p>								
RPS No. 6, A/Abad			Rs. 14700/- + GP + PM + INC			18/5/2013	<u>[Signature]</u>	S.D. Abb
			Rs. 15320/- Pm			12/10/13	<u>[Signature]</u>	S.I. A
<p>Entries revised and allowed one p.c. in two account due to upgradation from BPS 09 to BPS 12 - W.S.P. 10-2-2013</p>								
<p>13500/- ON next page</p>								
<p><u>[Signature]</u></p>								
9.7.11 to 11/01/12			1323					
11.5.11 to 9.5.12			43					
16.7.11 to 6.7.12			26					
19.9.11 to 6.8.12			12					
31.9.11 to 9.2.12			26					
5.5.11 to 7/1/2012			557					
<p><u>[Signature]</u></p>								

خدمت جناب ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا ایشاور

عنوان:-

APPEAL FOR RESTORATION OF FOURTH ADVANCE INCREMENT

جناب عالی! موجبات اپیل ذیل عرض ہے۔

(1) یہ کہ اپیلانٹ کی تقرری محکمہ تعلیم ضلع ایبٹ آباد میں P S T پوسٹ پر گریڈ 7 میں مورخہ 14-03-1995 کو ہوئی اور اب اپیلانٹ CT پوسٹ پر GHSS نمبر 3 ایبٹ آباد میں اپنے فرائض سرانجام دے رہا ہے۔

(2) یہ کہ محکمہ فنانس خیبر پختونخوا نے مورخہ 11-08-1991 کو ایڈونس اینکریمنٹ کے متعلق نوٹیفیکیشن جاری کیا جس میں اس بات کی وضاحت کی گئی جن پوسٹوں کی بنیادی قابلیت میٹرک ہے ان کو اعلیٰ تعلیم یعنی B.A کے چار ایڈونس اینکریمنٹ جاری کرنے کی سفارش کی گئی۔

(3) یہ کہ اپیلانٹ کو اعلیٰ تعلیم یعنی B.A کی ڈگری حاصل کرنے پر 14 اینکریمنٹس دی گئیں مگر 01-07-2011 کو چار میں سے ایک اینکریمنٹ واپس لے لی گئی جو کہ خلاف قانون ہے۔

لہذا استدعا ہے کہ اپیلانٹ کی B.A کی چوتھی اینکریمنٹ مورخہ

01-07-2011 سے بحال کی جائے اور اس کے جملہ بقایا جات بھی ادا کیے جائیں۔

لالہ قوم: 11-04-2023

العارض

محمد احسان قاضی CT

گورنمنٹ ہائر سیکنڈری سکول نمبر 3 ایبٹ آباد