

*original*  
**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Execution Petition No 367/2023**

**IN**

**Service Appeal No. 5696/2020**

Quraish Khan

Ex-PST Govt; Primary School Nagrai, District Buner

**Petitioner/ Complainant**

**Versus**

- (1) District Education Officer Male District Buner
- (2) Director (E & SE) KPK, Education Directorate, GT Road Peshawar
- (3) Head Teacher, GPS Nagrai, Buner

**Respondent/ Contemnor**

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**DEPONENT**

CNIC No 15101-0882586-3

①

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Execution Petition No 367/2023**

**IN**

**Service Appeal No. 5696/2021**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 6824

Dated 03/08/23

Quraish Khan

Ex-PST Govt; Primary School Nagrai, District Buner

Petitioner/ Complainant

**Versus**

1. District Education Officer Male District Buner
2. Director (E & SE) KPK, Education Directorate, GT Road Peshawar
3. Head Teacher, GPS Nagrai, Buner

Respondent/ Contemnor

**WRITTEN REPLY ON BEHALF OF RESPONDENTS**

Respectfully Sheweth!

**Facts**

1. Correct to the extent that this Honourable Tribunal in its detailed judgment dated 14-09-2021, in the light of the service appeal 5696/2020 ordered as follows:  
***"On acceptance of this appeal, we set aside the impugned orders and appellant stands voluntary retired from 01-07-2016 when he himself submitted application seeking premature retirement due to his health issues. In order to relieve the agony of the appellant the respondents are directed to expedite and process the pension case of the appellant within thirty days of the receipt of this judgment."***  
In the light of the courts directions mentioned above, to expedite the pension Case of the appellant, the respondent department converted compulsory retirement of the petitioner to voluntary pre-mature retirement vide this office notification No. 82-87 dated 07-01-2022. Furthermore, in the light of the Honourable court directions, pension case of the petitioner has already been issued vide office order no. 3808 dated 17-08-2022 and No. 624-26 dated 07-02-2023. The DAO has processed his pension case and the appellant has regularly been receiving his monthly pension. He has also been given all pensionary benefits and monthly pension w,e,f 01-07-2016. **(Notification of voluntary retirement, sanction to the encashment of leave and pension receiving slip of the petitioner are attached as Annexure "A", "B" and "C")**
2. Pertains to record.
3. Pertains to record.
4. The respondent department has placed the case for CPLA before the scrutiny committee held at Law department on 15-12-2021, under the chairmanship of Secretary Law, Parliamentary affairs and Human Rights department. The committee after threadbare discussion unanimously decided as follows:



- i. *The scrutiny committee perused the record of the case and the impugned judgement. The departmental Representative present in the meeting apprised the Security committee that the Khyber Pukhtunkhwa Service tribunal has held that the appellant shall stand voluntary retired from 01-07-2016. The departmental Representative further apprised the scrutiny committee that the appellant has received salaries unlawfully for 10 months, i.e., from 01-07-2016 to 30-05-2017, which is outstanding against the appellant. The departmental representative further apprised the scrutiny committee that the Khyber Pukhtunkhwa Service tribunal has not ordered for recovery of unlawful salaries received by the appellant for 10 months.*
- ii. *The Scrutiny Committee held that the Administrative Department may recover the salaries unlawfully received by the appellant as the Khyber Pukhtunkhwa Service Tribunal has not debarred the department from recovery of unlawful salaries received by the appellant."*

The same was communicated to the respondent department vide letter No. SO (Lit-II) E&SED/1-6/SA#5696/20/Quraish Dated Peshawar the 12-01-2022 with the following directions;

*"Wherein it was decided with consensus by Scrutiny Committee that the Administrative Department may recover the salaries unlawfully received by the appellant as the Khyber Pukhtunkhwa Service Tribunal has not debarred the department from recovery of unlawful salaries received by the appellant."*

(Minutes of the meeting and letter are attached as Annexure "D" & "E").

- 5. **Incorrect and hence denied. The respondent has implemented the courts orders in letter and spirit and issued voluntary retirement order of the appellant vide Notification No. 82-87 dated 07-01-2022 and the appellant stands voluntary retired from 01-07-2016. However, as he has also been given pension and pensionary benefits w.e.f 01-07-2016, the appellant has unlawfully taken salaries for ten (10) months even after his retirement, i.e., from 01-07-2016 till 30-04-2017, which was outstanding against him and the recovery of which is according to law, rules and policy. Thus any salary received after 01-07-2016 was liable to be recovered as double benefit, i.e., salaries and pensionary benefits for one and the same period is against the rules. As for as the stance of the appellant that recovery of salaries has been made for the period w.e.f 01-09-2015 to 30-06-2016 is wrong and misleading. The appellant has taken regular salaries for the above mentioned period. (Bank statement of the appellant and Account office record is annexed as Annexure "F" & "G").**

Furthermore, as far as the corrigendum order is concerned, it is in accordance with the General Clauses Act 1897, Rule 21, which reads as;

*"Whereby any (central act) or Regulations, a power to (issue notifications), orders, rules, or bylaws is conferred, then that power includes a power, exercisable in the like manner and subject to the like sanction and condition (if any) to add, to amend, to vary or rescind any notifications, orders, rules or by laws so issued."*

6. Incorrect and hence denied. The respondent department has not withdrawn any office order. As far as the stance of the appellant is concerned, in reply of the execution petition No. 353/2021, the respondent department implemented the orders of this Honourable court vide Notification bearing endorsement No 82-87 dated 07-01-2022. Furthermore, on 09-06-2022, upon the implementation report of the court judgment, the Honourable court disposed off the petition.

However, the appellant is twisting the orders of the court to create doubts for obtaining unlawful salaries even after his retirement. Such that, beside from getting pension and pensionary benefits w.e.f 01-07-2016, the appellant unlawfully took salaries for ten (10) months even after his retirement, i.e., from 01-07-2016 till 30-04-2017, which was outstanding against him and the recovery of which is according to law, rules and policy. **Thus any salary received after 01-07-2016 was liable to be recovered as double benefit, i.e., salaries and pensionary benefits for one and the same period is against the rules.**

7. Incorrect and hence denied. The respondent implemented court judgement in letter and spirit and issued voluntary retirement order of the appellant vide this office notification order No. 82-87 dated 07-01-2022, and in view of the mentioned order, the Honourable court has even disposed off the petition on 09-06-2022. However, as he has also been given pension and pensionary benefits w.e.f 01-07-2016, the appellant has unlawfully taken salaries for ten (10) months even after his retirement, i.e., from 01-07-2016 till 30-04-2017, which was outstanding against him and the recovery of which is according to law, rules and policy. **Thus any salary received after 01-07-2016 was liable to be recovered as double benefit, i.e., salaries and pensionary benefits for one and the same period is against the rules. Thus any salary received after 01-07-2016 was liable to be recovered as double benefit, i.e., salaries and pensionary benefits for one and the same period is against the rules.**

8. Correct up to the extent that the respondent department has submitted notification No. 624-26 dated 07-02-2023 for the correction of a clerical mistake. And after the submission of the mentioned order, the court filed the petition on 07-02-2023.

However, as the court ordered retirement of the petitioner from 01-07-2016, any amount/ salary taken by him after his retirement period, i.e., 01-07-2016, thus, **any salary received after 01-07-2016 was liable to be recovered as double benefit, i.e., salaries and pensionary benefits for one and the same period is against the rules.**

which is in accordance with the law. This Honourable Court has never ordered that any overpayment made to him after 01-07-2016 may not be recovered from him. Rather the court in its judgment upheld that recovery w.e.f 01-09-2015 to 30-06-2016 may not be made which the respondent never ever ordered, and the appellant has received salaries for the period w.e.f 01-09-2015 to 30-06-2016. Hence, by representing the orders of the court in a distorted manner, the petitioner is trying to grab salaries even after his retirement date, i.e., 01-07-2016, for which he has already taken pensionary benefits.

Furthermore, the scrutiny committee at law department also unanimously decided to recover salaries obtained by the appellant after 01-07-2016, date from which the

appellant stands voluntary retired. The same minutes and letter were sent to the respondent for implementation.

9. Incorrect hence denied. This Honourable court ordered the retirement of the petitioner from 01-07-2016, thus, any amount/ salary taken by him in his absence period after 01-07-2016 is liable to be recovered, which is in accordance with the law, rules and policy. **This Honourable Court has never ordered that any overpayment made to the appellant after the retirement may not be recovered from him, i.e., 01-07-2016. Rather the court in its judgment upheld that the recovery w.e.f 01-09-2015 to 30-06-2016 may not be made which the respondent never ever ordered. (Bank statement of the appellant is already attached as Annexure "F").**

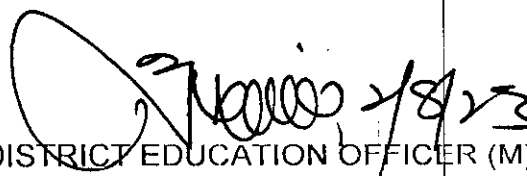
In addition, the scrutiny committee also unanimously decided to recover salaries obtained by the appellant after 01-07-2016, date from which the appellant stands voluntary retired. The same minutes and letter were sent to the respondent for implementation are already attached as Annexure "D" & "E".

10. Incorrect and hence denied. The respondent implemented court judgement in letter and spirit and issued voluntary retirement order of the appellant vide this office order number 82-87 dated 07-01-2022. Moreover, the appellant has been treated in accordance with the law and Honourable court directives. The respondent has issued voluntary retirement and pension order of the appellant in accordance with the Honourable court directives; however, the appellant is trying to get something/ unlawful amount which is neither his right nor does this Honourable court judgement supports. The appellant wants to grab the unlawful amount taken by him in the form of salaries after his retirement, 01-07-2016, which is against the essence and spirit of this Honourable court judgement. **(Bank statement of the petitioner w.e.f 01-07-2016 till 30-04-2017 is attached as Annexure "F").**

Furthermore, the appellant is receiving his pension regularly. **(Pension slip of the petitioner is already attached as Annexure "C")**

11. The respondent also seeks the permission of the Honourable court of service tribunal for any advance proof at the time of the arguments.

It is therefore humbly prayed that keeping in view the above submissions, the instant execution petition may very graciously be dismissed.

  
DISTRICT EDUCATION OFFICER (M)  
DISTRICT BUNER

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Execution Petition No 367/2023**

**IN**

**Service Appeal No. 5696/2021**

Quraish Khan

Ex-PST Govt; Primary School Nagrai, District Buner

\_\_\_\_\_  
**Petitioner/ Complainant**

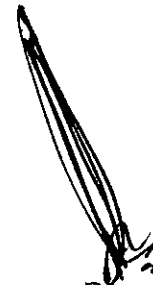
**Versus**

1. District Education Officer Male District Buner
2. Director (E & SE) KPK, Education Directorate, GT Road Peshawar
3. Head Teacher, GPS Nagrai, Buner

\_\_\_\_\_  
**Respondent/ Contemnor**

**AFFIDAVIT**

I, Ubaid ur Rahman, Superintendent BPS-17, office of the District Education (Male) Buner, do hereby solemnly affirms and state on oath that the whole contents of the reply are true and correct to the best of my knowledge and belief & nothing has been concealed from this Hon'ble Tribunal.



Deponent

15101-0882586-3

Annexure "A"

6

4



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DISTRICT BUNER  
PHONE & FAX NO. 0939-555110  
EMAIL: [edjobuner@gmail.com](mailto:edjobuner@gmail.com)



### Notification

1. WHEREAS Mr. Quraish Khan PST GPS Nagrai was proceeded against under E&D Rules 2011 for wilful absence, misconduct and corruption.
2. AND WHEREAS he was served with a showcause notice vide this office No.6425-28 dated 14-11-2017 and his reply was found unsatisfactory.
3. AND WHEREAS, the then DEO (M) Buner imposed upon him major penalty of "Compulsory Retirement" w-e-f- 1-7-2016 (A.N) and ordered recovery of overpayment amounting Rs. 412885/- from Quraish Khan PST, GPS Nagrai vide this Office No.421-26 dated 20-1-2018.
4. AND WHEREAS, the same order was challenged in Khyber Pakhtunkhwa Service Tribunal at camp Court Swat vide service appeal No.755/2018, which was remitted to the Competent Authority vide judgment dated 2/9/2019 for deciding afresh after De-novo inquiry in accordance with law.
5. AND WHEREAS, in compliance with the court order, the Competent Authority conducted de-novo inquiry vide this office No.7560-64 dated 12/10/2019. The inquiry committee recommended that penalty of "Compulsory Retirement" already imposed upon Mr. Quraish Khan PST GPS Nagrai may be retained w.e.f 1/7/2016.
6. AND WHEREAS, in the light of recommendations of the inquiry report, the then DEO(M) Buner retained penalty of "Compulsory Retirement" upon Mr. Quraish Khan PST GPS Nagrai of Tehsil Mandanr Buner w-e-f- 1-7-2016 vide this office No.469-74 dated 18/2/2020 & overpayment amounting Rs.412885/- w.e.f 1/7/2016 to 30/4/2017 (10 months.) may be recovered and deposited in the Govt; exchequer.
7. AND WHEREAS, the same order was challenged in the court of Khyber Pakhtunkhwa Service Tribunal Peshawar in Service Appeal No. 5696/2020, which was decided on 14/9/2021 with the directions to convert compulsory retirement into premature voluntary retirement w.e.f 1/7/2016.
8. NOW, therefore, in compliance with the Honourable Court Judgment dated 14-09-2021, in service appeal No.5696/2020, the Competent Authority is pleased to convert Compulsory Retirement from Service to Voluntary pre-mature Retirement in respect of Mr. Quraish Khan PST GPS Nagrai w-e-f- 1-07-2016.

(IFTIKHAR UL GHANI)  
DISTRICT EDUCATION OFFICER (M)  
BUNER

Endst; No. 82-87/1 Dated 7/1/2022.

Copy for information to; -

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. Registrar Khyber Pakhtunkhwa Service Tribunal at Camp Court, Swat.
3. District Monitoring Officer Buner,
4. Sub-Divisional Education Officer (M) Mandanr with the remarks/directives that necessary entry to this effect shall be made in his Service Book accordingly and recovery of overpayment Rs-412885/- for the period of (10 months) w.e.f 1/7/2016 to 30/4/2017 shall be made from his pension/gratuity under intimation to this office.
5. District Accounts Officer.
6. Official Concerned.

*Handwritten signatures and initials*  
DEO

*Handwritten signature*  
DISTRICT EDUCATION OFFICER (M)  
BUNER  
7/1/22



Amma... B1

~~Amma... (H)~~

~~Amma...~~

5



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DISTRICT BUNER  
PHONE & FAX NO. 0939-510468  
EMAIL: edobuner@gmail.com

NOTIFICATION

In continuation of this office sanction order issued vide Endst: No.82-87 dated 07/01/2022 in r/o Quraish Khan Ex-PST GPS Nagrai who was granted voluntary Pre-mature retirement sanction w.e.f 01/07/2016.

The Competent Authority is pleased to accord sanction to the encashment of leave in lieu of LPR for 272 days as admissible under the Revised Leave Rules,1981.

Note: - Necessary entry to this effect should be made in his service Book accordingly.

(IFTIKHARULGHANI)  
DISTRICT EDUCATION OFFICER  
DISTICT BUNER.

Endst: No. 3397-3460 Dated. 18/7 /2022.  
Copy forwarded for information to the;

1. District Accounts Officer Buner.
2. District Monitoring Officer Buner.
3. SDEO(M) Primary Mandanr Buner with the remarks that necessary entry to this effect shall be made in his Service Book accordingly and recovery of Rs-412885/- of the period of (10 months) w.e.f 1/7/2016 to 30/4/2017 shall be made from his pension/gratuity under intimation to this office.
4. Official Concerned.

Sub Dir:al: Edu Officer (M)  
Mandanr. Dist: Buner

DISTRICT EDUCATION OFFICER  
DISTICT BUNER.

*(Handwritten signatures)*  
DEO



Amma Khan "C"

(8)

Amma Khan

(18)

PENSION ROLL DATA SHEET & PENSION SLIP

Date of Issue : 29.11.2022  
 PPO Type : FRESH  
 PPO Number : 00272112-01  
 Pensioner ID : 00272112  
 Pension Register No:  
 Pensioner's Name : QURAISH KHAN  
 Father / Husband name : SARFARAZ KHAN  
 Designation : PRIMARY SCHOOL TEACHER  
 NIC No. : 153103437935  
 Grade / Scale : 12  
 Department/Mjn : GOVERNMENT PRIMARY SCHOOL  
 Pensioner's Type : SELF  
 Pension Type : RETIRING PENSION  
 Date of Birth : 12.12.1964  
 Date of appointment: 05.10.1988  
 Date of retirement: 01.07.2016  
 Date of Death:  
 Date of commencement: 02.07.2016  
 Date of Restoration : 01.07.2017  
 Accounts office ID : B D  
 Accounts office Name : Bunarai Dargah  
 Federal / Province : Khyber Pakhtunkhwa  
 Length of Qualifying Service : 27 years 3 months 28 days  
 Old PPO Number:  
 No. and Date of sanction of pension : Not applicable  
 and the date of the order Audit and Accounts officer authorizing the Pension Granting Commission  
 Permanent Address:

Note:  
 Age : 52 years  
 Last Drawn pay/Emoluments (Rs.) : 29540.00  
 Gross Pension (Rs.) : 10142.80  
 10th Surrendered Portion (Rs.) :  
 Cumulated Portion (Rs.) : 7154.98  
 Net Pension (Rs.) : 13287.82  
 Net Family Pension (Rs.) : 0.00  
 Amount of Commutation (Rs.) : 1460045.00  
 With Held Amount (Rs.) : 0.00  
 Life Time Arrears (Rs.) : 0.00  
 Arrears of Pension (Rs.) : 0.00  
 Special Additional Pension (RS) : 0.00  
 Commutation Percentage : 35.00  
 Commutation Table value : 17.61  
 Recovery on A/C of  
 Debitable to Govt : Khyber Pakhtunkhwa  
 Total Net Share  
 Federal : 0.00 Punjab : 0.00  
 Sindh : 0.00 NWFP : 0.00  
 Baluchistan : 0.00 Military : 0.00  
 AJK : 0.00 Autonomous : 0.00

He/She is also entitled to the following incentives

Sr No	Period	Incentive % of amount	Rate of amount	W.F.P
1	JUL 2021	Rs. 381.50	381.50	01.10.2022
2	JUL 2022	Rs. 381.50	381.50	01.10.2022
3	0	Rs. 0.00	0.00	
4				
5				
6				
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30				

Handwritten signature and stamp of the Deputy Commissioner (DCO).

PENSION SLIP

Month : November  
 Year : 2022

Pension roll details

Wage Type	Wage Type Text	Amount
000	Payment	7000.00
0100	Monthly Pension - Self	13287.82
0101	Pension increase - Self	27915.00
1000	Medical Allowance - Pensioner	1122.00
1001	Med. All. 2015 Pensioner	0100.00

Bank Details

Bank Account Number : 0610097178280013  
 Bank Branch : NAWAGAI BRANCH  
 NAWAGAI BRANCH  
 Payment Mode : ALLIED BANK LIMITED

Amended 11/11/21

9

8

6

Amended 11/11/21



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

**MOST IMMEDIATE / COURT MATTER**

NO.SO (Lit-II) E&SED/1-6/SA#5696/20/Quraish

Dated Peshawar, the 12.-01-2022

To

The Director,  
E&SE, Peshawar.

Attention: Assistant Director (Lit-II)

Subject: **REQUEST FOR FILING OF CPLA AGAINST THE JUDGMENT DATED 14.09.2021 OF THE HONORABLE SERVICE TRIBUNAL PESHAWAR IN SERVICE APPEAL NO. 5696/2020 TITLED QURAIKHAN VS GOVT. OF KHYBER PAKHTUNKHWA EDUCATION DEPARTMENT BEFORE THE AUGUST SUPREME COURT OF PAKISTAN**

I am directed to refer to the subject noted above and to enclose herewith a copy of Govt: of Khyber Pakhtunkhwa, Law, Parliamentary Affairs & Human Rights Department letter No. SO(Lit)/LD/Law/8.7.571/E&SED/2022/243-46 dated 03-01-2022 along with minutes of the meeting held on 15-12-2021 under the Chairmanship of Secretary Law Department, Govt. of Khyber Pakhtunkhwa, wherein it was decided with consensus by Scrutiny Committee that the Administrative Department may recover the salaries unlawfully received by the appellant as the Khyber Pakhtunkhwa Service Tribunal has not debarred the Department from recovery of unlawful salaries received by the appellant.

In view of the above, you are requested that necessary action may be taken in light of the minutes of the meeting.

Enc: as above.

Endst: of even No. & date.

Copy forwarded to:-

1. DEO(M, Buner.
2. PA to Deputy Secretary (Legal) E&SE Department.

SECTION OFFICER (LIT:II)

SECTION OFFICER (LIT:II)

Amended (2)



~~Amended (2)~~

Amended "E"

10

2/1



GOVERNMENT OF KHYBER PAKHTUNKHWA  
LAW, PARLIAMENTARY AFFAIRS AND  
HUMAN RIGHTS DEPARTMENT

MINUTES OF THE SCRUTINY COMMITTEE MEETING.

(AGENDA ITEM NO. 15)

SUBJECT: SERVICE APPEAL NO. 5696/2020 QURATSH KHAN VERSUS DISTRICT EDUCATION OFFICER (MALE), BUNER AND OTHERS.

A meeting of the Scrutiny Committee was held on 15.12.2021 at 11:00 A.M. in the office of Secretary, Law Parliamentary Affairs & Human Rights Department under his Chairmanship to determine the fitness of the subject case for filing of Appeal/CPLA in the Supreme Court of Pakistan. Assistant Advocate General (Mr. Wilayat Ali Khan) represented the Advocate General, Khyber Pakhtunkhwa.

2. The representatives of E&SE Department Mr. Ifikhar-ul-Ghani, DEO, Buner apprised the Committee about the background of the case and stated that the appellant filed the subject service appeal against the order dated: 18.02.2020 whereby major penalty of compulsory retirement from service w.e.f. 01.07.2016 and recovery of Rs. 412,885/- was imposed upon the appellant. The Khyber Pakhtunkhwa Service Tribunal vide order dated: 14.09.2021 accepted the subject service appeal, set aside the impugned orders and stand the appellant voluntary retired from 01.07.2016 when he himself submitted application seeking premature retirement due to his health issue and further directed the respondents to expedite and process the pension case of the appellant within 30 days. The Scrutiny Committee returned the subject case to the Administrative Department on the following grounds:

GROUND/DISCUSSIONS:

- i. The Scrutiny Committee perused the record of the case and the impugned judgment. The Departmental Representative present in the meeting apprised the Scrutiny Committee that the Khyber Pakhtunkhwa Service Tribunal has held that the appellant shall stand voluntary retired from 01.07.2016. The Departmental Representative further apprised the Scrutiny Committee that the appellant has received salaries unlawfully for 10 months i.e. from 01.07.2016 to 30.05.2017 which is outstanding against the appellant. The Departmental Representative further apprised the Scrutiny Committee that the Khyber Pakhtunkhwa Service Tribunal has not ordered for recovery of unlawful salaries received by the appellant for 10 months.
- ii. The Scrutiny Committee held that the Administrative Department may recover the salaries unlawfully received by the appellant as the Khyber Pakhtunkhwa Service Tribunal has not debarred the Department from recovery of unlawful salaries received by the appellant.

ADVICE:

3. Hence in view of above, it was decided with consensus by the Scrutiny Committee that the subject case may be returned to the Administrative Department accordingly.

(TAHIR IQBAL KHATTAK)  
SOLICITOR

# National Bank of Pakistan

## Account Statement

*Amirul F*

(11)

Account Title(s) QURESH KHAN S/O SARFARAZ KHAN

Address: VILL NAGRAI DISTT DAGGAR

STOPED BY DDO

Postal Code:

Branch Code/Name: 1704 DAGGAR

Region Name: Mardan

Statement Printing Date: 01-Jan-2019

User: 00013949

Branch: 0

Terminal: TECH

Town:

District:

City: BUNNER

Province/State: KH.PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 1374698

Account No: 4016191772

IBAN: PK19NBPA1704004016191772

Your CNIC has expired. Kindly provide a copy of your new CNIC to the bank at the earliest

B/F Balance: 38,389.00

From: 01-Jan-2014

To: 31-Dec-2018

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	07-Jan-2014	CASH	971821	07	32,000.00	0.00	6,389.00
2	31-Jan-2014	SALARY	1	31	0.00	30,067.00	36,456.00
3	04-Feb-2014	CASH	971822	04	32,000.00	0.00	4,456.00
4	28-Feb-2014	SALARY	1	28	0.00	30,067.00	34,523.00
5	03-Mar-2014	CASH	971823	03	32,000.00	0.00	2,523.00
6	01-Apr-2014	SALARY	1	01	0.00	32,787.00	35,310.00
7	02-Apr-2014	CASH	971824	02	32,000.00	0.00	3,310.00
8	30-Apr-2014	SALARY	1	30	0.00	32,787.00	36,097.00
9	03-May-2014	CASH	971825	03	32,000.00	0.00	4,097.00
10	30-May-2014	SALARY	1	30	0.00	32,787.00	36,884.00
11	03-Jun-2014	CASH	971826	03	32,000.00	0.00	4,884.00
12	30-Jun-2014	SALARY	1	30	0.00	32,756.00	37,640.00
13	02-Jul-2014	CASH	971827	02	32,000.00	0.00	5,640.00
14	23-Jul-2014	SALARY	1	23	0.00	31,379.00	37,019.00
15	25-Jul-2014	CASH	971828	25	32,000.00	0.00	5,019.00
16	29-Aug-2014	SALARY	1	29	0.00	31,912.00	36,931.00
17	02-Sep-2014	CASH	971829	02	34,000.00	0.00	2,931.00
18	30-Sep-2014	SALARY	1	30	0.00	34,682.00	37,613.00
19	02-Oct-2014	CASH	971830	02	34,000.00	0.00	3,613.00
20	30-Oct-2014	SALARY	1	30	0.00	37,528.00	41,141.00
21	05-Nov-2014	CASH	971831	05	34,000.00	0.00	7,141.00
22	01-Dec-2014	SALARY		01	0.00	34,672.00	41,813.00
23	02-Dec-2014	WITHDRL	971832		34,000.00	0.00	7,813.00
24	09-Dec-2014	CASH WITHDRAWAL	971833		7,000.00	0.00	813.00
25	31-Dec-2014	SALARY		31	0.00	35,375.00	36,188.00

This is a computer generated statement and does not require any signature

Page 1 of 4

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*[Signature]*  
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12

# National Bank of Pakistan

## Account Statement

Account Title(s) QURESH KHAN S/O SARFARAZ KHAN

Address: VILL NAGRAI DISTT DAGGAR

STOPPED BY DDO

Postal Code:

Branch Code/Name: 1704 DAGGAR

Region Name: Mardan

Statement Printing Date: 01-Jan-2019

User: 00013949 Branch: 0

Terminal: TECH

Town:

District:

City:

Province/State:

Country:

Product Name: PKR Current Account

Currency:

CIF No: 1374698

Account No: 4016191772

IBAN:

Your CNIC has expired. Kindly provide a copy of your new CNIC to the bank at the earliest

B/F Balance: 38,389.00

From: 01-Jan-2014

To: 31-Dec-2018

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
					34,000.00	0.00	2,188.00
26	05-Jan-2015	CASH WITHDRAWAL	971834				42,286.00
27	30-Jan-2015	SALARY		30	0.00	40,098.00	8,286.00
28	03-Feb-2015	CASH WITHDRAWAL	971835		34,000.00	0.00	41,750.00
29	28-Feb-2015	SALARY		28	0.00	33,464.00	7,750.00
30	03-Mar-2015	CASH WITHDRAWAL	971836		34,000.00	0.00	43,984.00
31	31-Mar-2015	SALARY		31	0.00	36,234.00	9,984.00
32	01-Apr-2015	CASH WITHDRAWAL	971837		34,000.00	0.00	46,118.00
33	30-Apr-2015	SALARY		30	0.00	36,134.00	11,118.00
34	04-May-2015	CASH WITHDRAWAL	971838		35,000.00	0.00	47,353.00
35	29-May-2015	SALARY		29	0.00	36,235.00	13,353.00
36	02-Jun-2015	CASH WITHDRAWAL	971839		34,000.00	0.00	49,637.00
37	29-Jun-2015	SALARY		29	0.00	36,284.00	15,637.00
38	02-Jul-2015	CASH WITHDRAWAL	971840		34,000.00	0.00	51,742.00
39	31-Jul-2015	SALARY		31	0.00	36,105.00	17,742.00
40	03-Aug-2015	CASH WITHDRAWAL	971841		34,000.00	0.00	54,342.00
41	01-Sep-2015	SALARY		01	0.00	36,601.00	15,342.00
42	02-Sep-2015	CASH WITHDRAWAL	971842		39,000.00	0.00	54,511.00
43	18-Sep-2015	SALARY		18	0.00	39,173.00	14,511.00
44	21-Sep-2015	CASH WITHDRAWAL	971843		40,000.00	0.00	53,299.00
45	31-Oct-2015	SALARY		31	0.00	38,775.00	14,299.00
46	02-Nov-2015	CASH WITHDRAWAL	971844		39,000.00	0.00	53,000.00
47	30-Nov-2015	SALARY		30	0.00	38,775.00	14,000.00
48	02-Dec-2015	CASH WITHDRAWAL	971845		39,000.00	0.00	53,500.00
49	30-Dec-2015	SALARY		30	0.00	39,478.00	14,500.00
50	04-Jan-2016	CASH WITHDRAWAL	971847		39,000.00	0.00	14,500.00

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Page 2 of 4

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# National Bank of Pakistan

## Account Statement

13

Account Title(s) QURESH KHAN S/O SARFARAZ KHAN

Address: VILL NAGRAI DISTT DAGGAR

STOPED BY DDO

Postal Code:

Branch Code/Name: 1704 DAGGAR

Region Name: Mardan

Statement Printing Date: 01-Jan-2019

User: 00013949

Branch: 0

Terminal: TECH

Town:

District:

City:

Province/State:

Country:

Product Name: PKR Current Account

Currency:

CIF No: 1374698

Account No: 4016191772

IBAN:

Your CNIC has expired. Kindly provide a copy of your new CNIC to the bank at the earliest

B/F Balance: 38,389.00

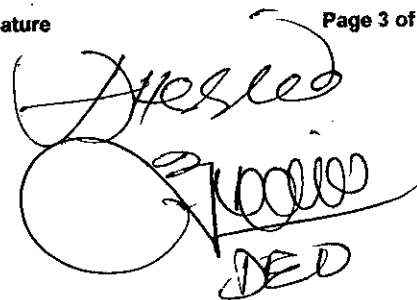
From: 01-Jan-2014

To: 31-Dec-2018

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
51	29-Jan-2016	SALARY		29	0.00	36,747.00	51,291.00
52	01-Feb-2016	CASH WITHDRAWAL	971848		40,000.00	0.00	11,291.00
53	29-Feb-2016	SALARY		29	0.00	36,747.00	48,038.00
54	01-Mar-2016	CASH WITHDRAWAL	971850		35,000.00	0.00	13,038.00
55	31-Mar-2016	SALARY		31	0.00	42,414.00	55,452.00
56	04-Apr-2016	CASH WITHDRAWAL	971849		40,000.00	0.00	15,452.00
57	29-Apr-2016	SALARY		29	0.00	39,458.00	54,910.00
58	05-May-2016	FEE		05	175.00	0.00	54,735.00
59	09-May-2016	CASH WITHDRAWAL	635476		42,000.00	0.00	12,735.00
60	31-May-2016	SALARY		31	0.00	39,559.00	52,294.00
61	01-Jun-2016	CASH WITHDRAWAL	635478		42,000.00	0.00	10,294.00
62	27-Jun-2016	SALARY		27	0.00	39,528.00	49,822.00
63	28-Jun-2016	CASH WITHDRAWAL	635479		42,000.00	0.00	7,822.00
64	29-Jul-2016	SALARY		29	0.00	39,679.00	47,501.00
65	01-Aug-2016	CASH WITHDRAWAL	635480		42,000.00	0.00	5,501.00
66	31-Aug-2016	SALARY		31	0.00	42,449.00	47,950.00
67	03-Sep-2016	CASH WITHDRAWAL	635481		47,000.00	0.00	950.00
68	30-Sep-2016	SALARY		30	0.00	42,102.00	43,052.00
69	31-Oct-2016	SALARY		31	0.00	41,630.00	84,682.00
70	30-Nov-2016	SALARY		30	0.00	41,630.00	126,312.00
71	31-Dec-2016	SALARY		31	0.00	42,459.00	168,771.00
72	31-Jan-2017	SALARY		31	0.00	39,689.00	208,460.00
73	04-Feb-2017	CASH WITHDRAWAL	635482		150,000.00	0.00	58,460.00
74	28-Feb-2017	SALARY		28	0.00	39,269.00	97,729.00
75	07-Mar-2017	CASH WITHDRAWAL	635484		95,000.00	0.00	2,729.00

This is a computer generated statement and does not require any signature

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# National Bank of Pakistan

## Account Statement

14

Account Title(s) QURESH KHAN S/O SARFARAZ KHAN

Address: VILL NAGRAI DISTT DAGGAR

STOPED BY DDO

Postal Code:

Branch Code/Name: 1704 DAGGAR

Region Name: Mardan

Statement Printing Date: 01-Jan-2019

User: 00013949

Branch: 0

Terminal: TECH

Town:

District:

City:

Province/State:

Country:

Product Name: PKR Current Account

Currency:

CIF No: 1374698

Account No: 4016191772

IBAN:

Your CNIC has expired. Kindly provide a copy of your new CNIC to the bank at the earliest

B/F Balance: 38,389.00

From: 01-Jan-2014

To: 31-Dec-2018

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
76	31-Mar-2017	SALARY		31	0.00	42,039.00	44,768.00
77	04-Apr-2017	CASH WITHDRAWAL	635485		42,000.00	0.00	2,768.00
78	27-Apr-2017	SALARY		27	0.00	41,939.00	44,707.00
79	03-May-2017	CASH WITHDRAWAL	635486		42,000.00	0.00	2,707.00

Total 40 Credit transactions of amount: 1,491,493.00

Total 39 Debit transactions of amount: 1,527,175.00

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pay slip

1-7-2016 to 31-5-2017

~~Amirul Hameed~~

~~Amirul Hameed~~

~~Amirul Hameed~~

Amirul Hameed

(21)

(14)

(15)

Personnel No 272112 Name QURAIISH KHAN  
 EE group 1 Active Permanent Pers.area DN01 Dist. Govt. KP-Provincial  
 EE subgroup 12 Grade 12 Cost Center BD009 GPS MALE BUNER  
 Choose 01.01.1900 to 31.12.9999 STy.

STy	Re	Start Date	End Date	Ty	Ar	PS group	Lv	Amount	1st c...	Total amount
0	11	01.07.2017	31.12.9999	P1	17	12	24	35,400.00	PKR	
0	02	01.12.2016	30.06.2017	P1	16	12	24	29,540.00	PKR	
0	11	01.07.2016	30.11.2016	P1	16	12	23	28,740.00	PKR	
0	02	01.12.2015	30.06.2016	P1	15	12	23	23,355.00	PKR	
0	11	01.07.2015	30.11.2015	P1	15	12	22	22,705.00	PKR	
0	02	01.01.2015	30.06.2015	P1	11	12	22	17,500.00	PKR	
0	02	01.12.2014	31.12.2014	P1	11	12	21	17,000.00	PKR	
0	02	01.12.2013	30.11.2014	P1	11	12	20	16,500.00	PKR	
0	02	01.08.2013	30.11.2013	P1	11	12	19	16,000.00	PKR	
0	02	01.12.2012	31.07.2013	P1	11	12	19	16,000.00	PKR	
0	02	01.12.2011	30.11.2012	P1	11	12	18	15,500.00	PKR	
0	11	01.08.2011	30.11.2011	P1	11	12	17	15,000.00	PKR	

*[Handwritten Signature]*  
 District Accounts Officer  
 Buner at Dagrjar




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**OFFICE OF THE DISTRICT EDUCATION OFFICER MALE DISTRICT BUNER**

**AUTHORITY LETTER**

Mr. Ubaid Ur Rahman, Superintendent BPS-17, Office of the District Education Officer Elementary & Secondary Education Buner is hereby authorized to submit reply on behalf of the undersigned in connection with the Execution Petition No. 367/ 2023 in Service Appeal No. 5696/2021 titled Quraish Khan Versus District Education Officer Male Buner and Others in the Honorable Court of Service Tribunal Khyber Pukhtunkhwa Peshawar.

  
DISTRICT EDUCATION OFFICER  
MALE DISTRICT BUNER