

Service Appeal No. 1310/2013

Fazal Qayum S/o Khan Baz PST teacher GPS No. 2 Shagai Mardan.

VERSUS

Director of Education Khyber Pakhtunkhwa Peshawar & another.

Order

22.11.2017

Learned counsel for the appellant present.

Learned Deputy District Attorney present.

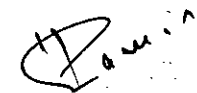
Arguments heard. File perused.

Learned counsel for the appellant argued that he would press the present appeal to the extent that the respondent department may be directed to prepare seniority list of PST Teachers District Mardan strictly in accordance with the provision of Section 8 of Khyber Pakhtunkhwa Civil Servant Acts 1973.

Admittedly the appellant is a PST Teacher and as such is a Civil Servant too. The respondent department so far failed to produce any seniority list which includes the name of the appellant. In the circumstances of the case and in view of the stance of learned counsel for the appellant the respondent department is directed to prepare seniority list of PST Teachers District Mardan strictly in accordance with the legal provisions/Section 8 of the Khyber Pakhtunkhwa Civil Servant Act 1973. Parties are left to bear their own costs. File be consigned to the record room.

Disposed off accordingly.

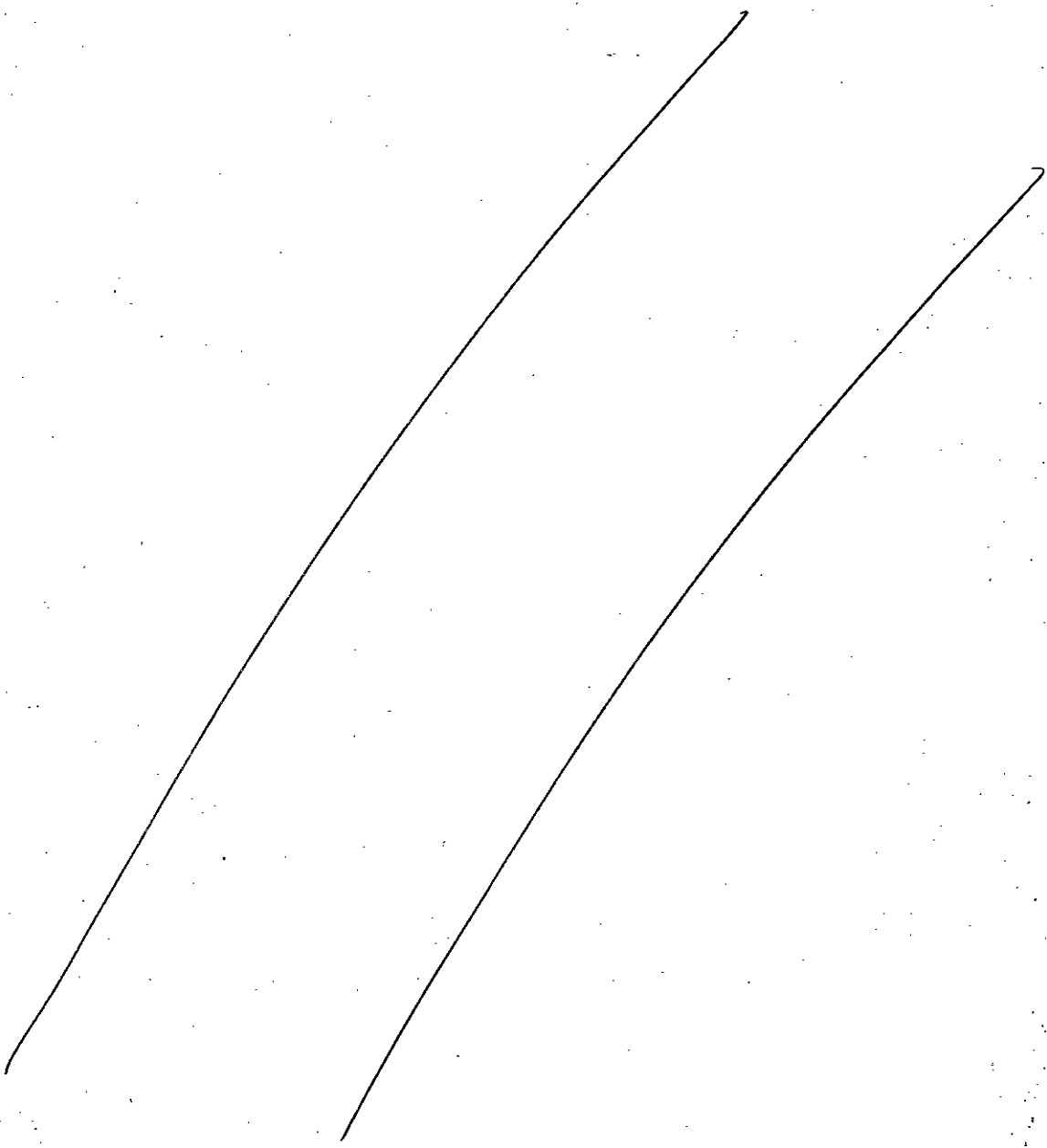

(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

23/8/2017

Counsel for the appellant and Mr. Adeel Butt, AAG the respondents present. Arguments could not be heard due to non availability of DB. To come up for arguments on 22/11/2017 before DB.


(GUL ZEB KHAN)
MEMBER



17.08.2016

Appellant in person and Additional AG for the respondents present. Rejoinder not submitted and requested for further time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 26-12-16 before D.B.

Member

Member

26.12.2016

Clerk to counsel for the appellant and Mr. Hameed ur Rehman, AD (Litigation) alongwith Mr. Ziauallah, GP for respondents present. Arguments could not be heard due to incomplete bench. Case adjourned to 02.05.2017 for rejoinder and arguments before D.B.

Chairman

02.05.2017

No. one present on behalf of the appellant. Mr. Muhammad Jan, Government Pleader for respondent present. Notice be issued to the appellant and his counsel. To come up for final on 23.08.2017 before D.B.

Member

Chairman

26.11.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as Elementary Teacher (PST) in the year 1993. That according to section-8 of NWFP Civil Servants Act, 1973 appellant was entitled to be shown in the seniority list of the said cadre but despite repeated efforts of the appellant the respondents failed to adhere to his demand as such the appellant preferred departmental appeal on 5.4.2013 which was not responded and hence the instant service appeal on 2.8.2013.

That the appellant is entitled to have his name included in the seniority list of PST Cadre.

Points urged need consideration: Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.2.2016 before S.B.

Appellant Deposited
Security & Process Fee




Chairman

23.02.2016

None present for appellant. M/S Hameed-ur-Rehman, AD (lit.) and Javed Shah, legal Advisor alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 26.4.2016 before S.B.


Chairman

26.4.2016

Counsel for the appellant, M/S Hameed-ur-Rehman, AD (lit.), Khurshid Khan, SO and Javed Shah, litigation officer alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 7.8.2016.


Chairman

02.03.2015

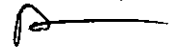
None present for appellant. Add: AG for the respondents present. Notice be issued to counsel for the appellant for preliminary hearing for 28.04.2015 before S.B.



Member

28.04.2015

Appellant in person and Mr. Ziaullah, GP for the respondents present. Appellant requested for adjournment. To come up for preliminary hearing on 15.06.2015 before S.B.



Member

15.06.2015

Mr. Gul Hussain, Advocate on behalf of counsel for the appellant and Asstt: AG for the respondents present. Counsel for the appellant is not in attendance. Requested for adjournment. Adjourned to 27.08.2015 for preliminary hearing before S.B.

Member

27.08.2015

None for the appellant present. Asstt: AG for respondents present. Notice be issued to appellant/counsel. To come up for preliminary hearing on 26.11.2015 before S.B.

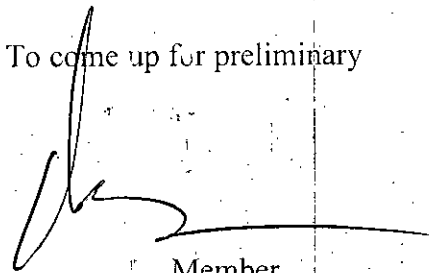


Member

13/0/13

15.08.2014

Appellant alongwith his counsel present. Preliminary arguments partly heard. The appellant through instant appeal prayed for his seniority as PST Teacher. In this respect the appellant filed departmental appeal which was not responded. However, post of the appellant has been upgraded from BPS 7 to BPS 12 and his case re-scrutinized, Hence pre-admission notice also be issued to the learned GP to assist the Tribunal in light of record available with the respondents. To come up for preliminary hearing on 30.09.2014.



Member

30.09.2014

Clerk of counsel for the appellant and Mr. Wisal Muhammad, ADO with Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Preliminary arguments could not be heard due to General Strike of the Bar. To come up for preliminary hearing on 09.12.2014.



Member

Reader Note:

09.12.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 23/02/2015 for the same.



Reader

15.05.2014

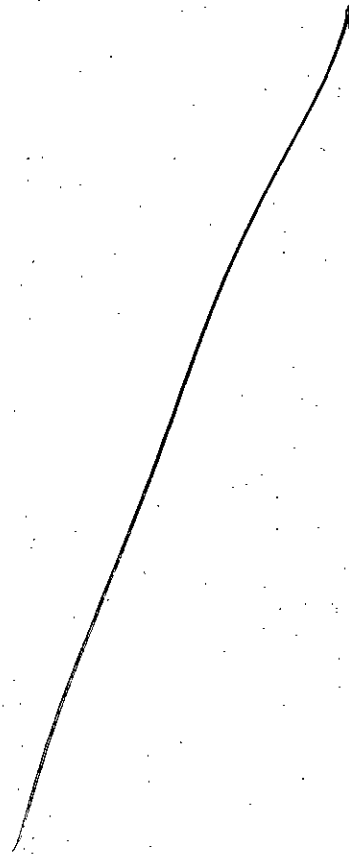
Mr. Said Muhammd in the connected appeals present and filed an application for placing on file upgradation order of appellant from BPS-7 to BPS-12. He requested for adjournment. Request accepted. To come up for preliminary hearing on 30.06.2014.


Member

30.06.2014

Mr. Said Muhammad in the connected appeal present and requested for adjournment. Request accepted. To come up for preliminary hearing on 15.08.2014.

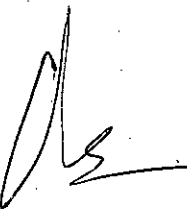

Member



02.12.2013

Clerk of counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 20.01.2014.

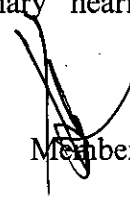
Member



20.01.2014

Mr. Said Muhammad in the connected appeals present and requested for adjournment as his counsel was busy in the High Court, Peshawar. To come up for preliminary hearing on 12.02.2014.

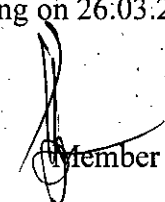
Member



12.02.2014

Counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 26.03.2014.

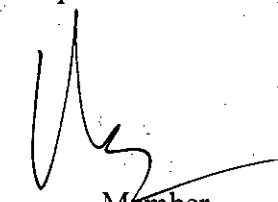
Member



26.03.2014

Mr. said Muhammad in the connected appeals present and requested for adjournment as his counsel was busy in the Peshawar High Court, Peshawar. Request accepted. To come up of preliminary hearing on 15.05.2014.



Member



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1310 /2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09/09/2013	<p>The appeal of Mr. Fazal Qayum resubmitted today by Mr. Yaqoob Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	11-8-2012	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>2-12-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Fazal Qayum PST received today i.e. on 02/08/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is not mentioned.
- 2- Copy of impugned seniority list is not attached with the appeal which may be placed on it.
- 3- Copy of up gradation order of appellant dated 21.2.2011 mentioned in para-5 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 1128 /S.T.

Dt. 5/8 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Yaqub Khan Adv. Mardan

*Sir, objections removed, completed and re-submitted
Please. Moreover, the name of appellant is neither mentioned
in the seniority list of PST nor said seniority list is
circulated to the appellant, hence not attached with
memo of appeal.*

Yaqub..
Yaqub Khan Advocate
9/9/2013

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA PESHAWAR.

Appeal NO. 1310 /2013.

Fazal Qayum s/o Khanbaz PST teacher GPS NO.2 Shagai

Mardan r/o village Nasir Kili Tehsil and Distt:Mardan.

.....Appellant.

VERSUS.

Director of Education Khyber Pakhtoonkhwa Peshawar.

and others.

.... Respondents.

I N D E X.

S.NO.	Description of documents.	Annexure.	Page.
1.	Memo of appeal w/Affidavit.		1-4
2.	Copy of Certificates of Petr:	A	5-6
3.	Copy of Service book of Ptr:	B.	7-16
4.	Copy of Order.	C.	17-19
5.	Copy of Affidavit.	D	- 20
6.	^{copy of depp Appeal} Wakalat Name.	E	21-22 - 23

Appellant. فازل قیوم

~~Said Muhammad~~

Through Counsel:-

Dated: 07.2013.

Fazal Qayum.

(Yaqub Khan)

Advocate Distt:Courts,
Mardan.

Appeal NO. 1310 /2013

~~AWP~~
~~1226~~
~~02/8/13~~

Fazal Qayum s/o Khanbaz PST teacher GPS NO.2 Shagai

Mardan r/o village Nasir Kili Tehsil and Distt:Mardan.

.....Appellant.

VERSUS.

1. DIRECTOR OF EDUCATION KHYBER PAKHTOONKHWA PESHAWAR.
2. D.E.O (P) (M) MARDAN.RESPONDENTS.

Lws of NWFP Service Tribunal Act 1974
APPEAL FOR INCLUDING THE NAME OF APPELLANT IN THE
SENIORITY LIST OF PST TEACHER MARDAN ON THE BASIS
OF HIS REGULAR APPOINTMENT OF APPELLANT AS A PST
TEACHER VIDE ORDER DATED 19.04.1993 AS PER LAW
AND RULE ACCORDINGLY.

R/Sir,

Appellant humbly submits as under:-

1. That appellant is posted as PST teacher with respondent department.
2. That appellant has equipped requisite qualification for the post of PST teacher.

(Copy of Certificates is attached as Annex:"A").

re-submitted to ~~the~~
and filed.

[Signature]
2/8/13
[Signature]
9/9/13

3. That appellant was appointed as E.T/ Primary teacher by respondent on 19/4/93 after completion of all codal formalities and took over charge and performed his duty with entire satisfaction of his superior and received his salary properly.

(Copy of service book is attached as Annex: "B").

4. That appellant has served with respondent's department from date of appointment till today and there is no any break in service of appellant.

5. That due to his best performance and well aware of his job, appellant was up-graded from EPS-5 to EPS-7 vide order dated 16.10.2004

(Copy of order is attached as Annex: "C").

6. That appellant has got knowledge that respondent's department has prepared seniority list, which is not circulated to the appellant but the name of appellant is not included in the seniority list of PST at his proper place on the basis of his regular appointment i.e. 1st: appointment of appellant.

(Copy of affidavit to the same effect is attached as Annex: "D").

7. That appellant preferred an appeal before the respondent NO.1 but in vain.

(Copy of departmental appeal is attached as annex: "E").

8. That appellant is entitled for placing in the seniority list of PST teachers, Mardan on the following grounds.

G R O U N D S:-

- A. That when appellant was appointed as a Primary teacher against regular Post on regular basis, then as per Sec: 8 (4) of Civil Service Act 1973, he is entitled for seniority from the date when he was appointed i.e. 19/4/93.
- B. That similarly placed all primary teachers have been included in the seniority list from the date of 1st: appointment, while appellant is ignored, which is clear and crystal discrimination.
- C. That when appellant was appointed as Primary teacher on regular basis then he is entitled for his seniority from the date of his 1st: appointment at his proper place in the seniority list of PST teachers, Mardan.

It is therefore, humbly prayed that on acceptance of this appeal, respondents may please be directed to include the name of appellant in the seniority list of PST teachers, Mardan from the date of 1st: regular appointment at his proper place of seniority. Any other relief deemed fit may also be graciously awarded.

APPELLANT. *Fazal Qayum*
~~_____~~
Fazal Qayum

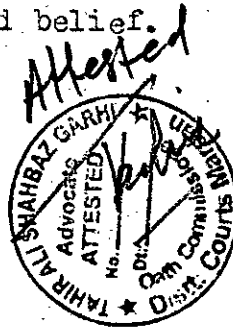
Through Counsel:-

Yaqub
 (YACQOB KHAN)
 Advocate Distt: Courts,
 Mardan.

Dated: 01.08.2013.

A F F I D A V I T.

I, undersigned declare on Oath that contents of appeal are true and correct to the best of my knowledge and belief.



Deponent. *Fazal Qayum*
~~_____~~

Ans A 5

EDUCATION DEPT
N.-W.F.P., PESHAWAR



PRIMARY TEACHING CERTIFICATE

Division Second (1)

ROLL NO. 6222

Certified that Fazli Qayum
born on 1-4-1965 (First April, Fourteen hundred and Sixty Five)

Son/Daughter of Khan Baz
resident of xxx Tehsil xxx District Mardan

having passed the P.T.C. Examination held in 1996, is qualified to teach in Primary and Middle
except English.

Trained at the Government Training School, GHS, No. 3

Session 1996 - 13

Prepared by [Signature]

Checked by [Signature]

Chief Officer, P.T.C. Examinations

Dated Peshawar,

the 13-5-1997.

[Signature]

[Signature]

Departmental Examinations
Education Department, Peshawar

Attached to be
true copy
[Signature]



University of Peshawar (Pakistan)

Session ANNUAL 1993

FAZAL QAYUM Son of KHAN BAZ and a student
of DISTRICT MARDAN having passed the prescribed examination
held in AUGUST 1993; 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 ~~as a whole~~ in parts.

*Attested to be
true copy:-*

Serial No: 032603

Registration No: 85-PA-13625

Roll No. 55329

Result declared on MARCH 17, 1994



Fazli Hamid
Registrar

Countersigned

M O L
Vice-Chancellor

(Signature)

OFFICE OF THE DEPT: EDUCATION OFFICER (MALE) PRIMARY MARDAN

Aux B
②
①

APPOINTMENT

Appointment of the following person is/are hereby ordered against the post of Elementary Teacher on temporary and adhoc basis @Rs. 1035/- p.m. ~~XXXXXX~~ plus usual allowances as admissible under rules in the BPSMO. 5 Rs. 1035-49-1770 at the school noted against each names:-

<u>S.NO.</u>	<u>Name, Qual. and Address.</u>	<u>Post at</u>	<u>Remarks.</u>
1.	Mr. Fazal Qayyum s/o Mr. Khan Baz village Nasir Kili (Mardan) SSO FA	Govt. Elementary school Kochi Abad	vice Mr. Mohammad shoaib who resigned.

CONDITION OF APPOINTMENT.

1. His services is liable to termination/reversion at any time without any reason being assigned.
2. In case of resignation He will have to submit one month's perior notice to the Deptt; or forfeit one month's pay in lieu thereof to Government
3. He should not be allowed to take-over charge if his age is less than 18 years and above 25 years.
4. He is required to produce Health and Age certificate from Medical Supdt; and Hosital Mardan before taking over charge.
5. Charge reports should be submitted to all concerned
6. If He fails to take-over charge of the post within 14 days after the issue of these orders the order of appointment shall stand cancelled.
7. Certificates should be checked before hand-over charge.

(MR. MOHAMMAD YAKUB KHAN)
OFFICE OF THE DEPT: EDUCATION OFFICER
(MALE) PRIMARY MARDAN.

Order NO. 4294/06 / Dated Mardan the 14/4 / 1993
Copy forwarded to the:-

1. Sub-Divisional Education Officer (Male) Mardan
2. B.O. Mardan.
3. Candidate concerned.

Attested to be
true copy:-
Yours,

[Signature]
14/4/93
OFFICE OF THE DEPT: EDUCATION OFFICER
(MALE) PRIMARY MARDAN.

(For use in Police Department only).

① Passed SSC-1A Examination 1980 from B.I.E. Peshawar under Roll No 26081 obtaining 368/650 marks in Grade "C"
 Heirs,
 The Result declared on 30-8-1980

Sub Divisional Education Officer, (Male) Mardan

② Passed mathematics only from B.I.E. Peshawar Under Roll No 14176 obtaining $\frac{23}{100}$ marks

Sub Divisional Education Officer, (Male) Mardan

③ Passed F.A.-(S) Examination 1982 from B.I.E. Peshawar Under Roll No 9933 obtaining 431 marks in Grade "D"
 The Result declared on 8-1-1983

Sub Divisional Education Officer, (Male) Mardan

④ Passed P.A. (Tyc) Examination 1993 Annual from the University of Peshawar under R.No 55329 securing 285/550 (Two hundred and eighty five). Entry made on the basis of D.T.C. Result declared on 19-2-1994

Qualification	Date	Qualifications	Date
English passed P.T.C Examination 1996 from R.D.F. Peshawar Under Roll No 5222 marks obtained $\frac{629}{1200}$ Pashtu He has been placed in II nd division Result declared on 13-5-97.		First Arts (Male) Mardan, "	
		B. L. or B. A.	
		Pleadership examination	
Plan-drawing	S.D.O. (M) MARDAN.	Training School Final examination	
Finger print		Other qualifications—	
⑤ Passed MA Examination (with Pesho) from University of Peshawar Session 2003 (Annual) under Roll No. 24947, Securing 496/1100 marks and placed in 2nd Division.			
Court duties	Result declared on 28-1-2004.		
Reserve duties			

By: District Officer (M) Peshawar Jan

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

Affected to be true with yours

2A

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

1. Name *MR. FAZAL - DAYUM.*

2. Race *Afghan.*

3. Residence *Masia Kelli
Hamza Khan (Mardan)*

4. Father's name and residence *MR. KHAN. BAZ.*

5. Date of birth by Christian era as nearly as can be ascertained *1.4.1965
1st April N.H. of Sixty Five.*

6. Exact height by measurement *5'7"*

7. Personal marks for identification *mole on the left side of nose.*

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

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.



9. Signature of Government servant. *Fazal Dayum*

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

[Signature]
Sub-Division of Education
Office, Mardan

*Attested to be true copy -
Yous*

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	
✓ Elementary teacher G.E.S. Koeki Abaul.								
		B.P.S. NO 5 (P.S. 1035-49-1770)						
-do-	Sub off.		Rs. 1235/- P.M.			20-4-93	Fozal Bazar	
-do-	-do-		Rs. 1084/-	✓		1-12-93	Fozal Bazar	
		B.P.S. NO 5 (P.S. 1400-66-2390)						
-do-	-do-		Rs. 1466/-	✓		1-6-94	Fozal Bazar	
-do-	-do-		Rs. 1532/-	✓		1-12-94	Fozal Bazar	
-do-	-do-		Rs. 1598/-	✓		1-12-95	Fozal Bazar	
-do-	-do-		Rs. 1664/-	✓		1-12-96	Fozal Bazar	
Returned service Rules	-do-		Rs. 1730/-	✓		1-12-97	Fozal Bazar	
For the Post of E/Teacher my Pleas are produced.								
-do-	-do-		Rs. 1796/-	✓		1-12-98	Fozal Bazar	
-do-	-do-		Rs. 1862/- P.M. 66			1-12-99	Fozal Bazar	
-do-	-do-		Rs. 1928/- P.M.	✓		1-12-2000	Fozal Bazar	

Signature
of the
Other
officer
in
charge
of
the
office
at
the
time
of
the
appointment

D.E.O.
MARD
D.E.O.
MARD
D.E.O.
MARD
D.E.O.
MARD
D.E.O.
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D.E.O.
MARD
D.E.O.
MARD

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 debitable to another Government		
Signature of Government servant	Signature and designation of the head of the office or other attesting officer	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	Period	Government to which debitable	Reference to any recorded punishment or censure, or award or praise of the Government servant.
30-11-93	Annual Inc.	Appointed against Elementary teacher in B.S. nos 5 on temporary basis and Ad hoc Rs 1035/- P.M. Plus usual Allowances as admissible under the rules vide D.E.O. (M) Primary Mardan Enlist no 94-96 dated 19-4-1993					
31-5-94	Pay Renewal						
30-11-94	Annual Inc.						Sub Divisional Education Officer, (M) Mardan
30-11-95	A/Inc	S.D.E.O. (M) MARDAN.					Granted age Relaxation in the office
30-11-96	A/Inc	S.D.E.O. (M) MARDAN.					Age limits for the period 3 years 6 months and 20 days in order to enable him to be considered for appointment as a Elementary teacher vide section officers (Primary) Enlist no. SO (PE) Edu/7-1/92 (K.C. dated 19-11-1993)
30-11-97	A/Inc	S.D.E.O. (M) MARDAN.					
30-11-98	A/Inc	S.D.E.O. (M) MARDAN.					Sub Divisional Education Officer, (M) Mardan
							Service verified w.e.f 20-4-93 to 30-11-93 from the Acu: Roll & other record of the office.
30-11-99	A/Inc	S.D.E.O. (M) MARDAN.					12/95 to 30/96
30-11-99	A/Inc	S.D.E.O. (M) MARDAN.					
30-11-99	A/Inc	S.D.E.O. (M) MARDAN.					12/96 to 30/97

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 servant	Signature and designation of the officer in attendance in attestation of columns
S. S. K. Kochi	Sub/Off		B. 1984-PM			12/21	F. B. D. D.	
do	do	BDS-5C 3/2-1-2-5(2)	R. 3000/- PM			12/21	F. B. D. D.	
do	do		R. 3100/- PM			12/2002	F. B. D. D.	
do	do		R. 3200/- PM			12/2003	F. B. D. D.	
BPS No: 7 @ Rs (2220-120-5820)								
PTC	do		R. 3300/- PM			30/04	F. B. D. D.	
CPDS No: 12 Shagri	do		R. 3420/- PM			01/12/04	F. B. D. D.	
do	do		R. 3420/- PM			01/12/04	F. B. D. D.	
<div data-bbox="274 1490 776 1898" data-label="Text"> <p>(1994) Office of the Accounting General Pay Fixation Order No. 1400-66-2890-25 of 1994 at Rs. 1466/- with effect from 01.12.2004</p> </div>								
BPS No. 67 @ Rs. 2555-140-6750								
u	do		R. 3955/- PM			01/2005	F. B. D. D.	
u	do		R. 4095/- PM			01/2005	F. B. D. D.	

8	9	10	11	12	13		14	15
					Leave			
Signature and designation of the head of the office or other attesting officer in attestation of 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		
Signature of Government Servant	30/11/2002	Revised	[Signature]				Service Verified From Acquittances Roll and other school record from 1-1-79 To 30-11-99	
Dy. D.O. (M) Pry: Mardan			Dy. D.O. (M) Pry: Mardan				Sub. Office	
[Signature]	30/11/2002	A/O	[Signature]					
Dy. D.O. (M) Pry: Mardan			Dy. D.O. (M) Pry: Mardan					
[Signature]	30/11/2002	A/O	[Signature]				Service Verified from Acq. Roll	1-12-79 to 30-11-2000 office record.
Dy. D.O. (M) Pry: Mardan			Dy. D.O. (M) Pry: Mardan					
[Signature]	30/10/04	Appointment PTC	[Signature]					
Dy. D.O. (M) Pry: Mardan			Dy. District Officer (M) Pry: Teh Mardan					
[Signature]	30/11/2002	A/Int	[Signature]				Service Verified w.e.f 1-12-79 to 30-11-2001 From the Acq. Roll & other record of This office.	
Dy. District Officer (M) Pry: Teh Mardan			Dy. District Officer (M) Pry: Teh Mardan					
[Signature]	30/06/2005	Pay Revised	[Signature]					
Dy. District Officer (M) Pry: Teh Mardan			Dy. District Officer (M) Pry: Teh Mardan					
[Signature]	30/11/2002	A/Int	[Signature]				Service Verified w.e.f 1-12-2001 to 30-11-2002 From the Acq. Roll & other record of This office.	
Dy. District Officer (M) Pry: Teh Mardan			Dy. District Officer (M) Pry: Teh Mardan					
[Signature]	30/11/2005	A/Int	[Signature]				Service Verified w.e.f 1-12-2001 to 30-11-2002 From the Acq. Roll & other record of This office.	
Dy. District Officer (M) Pry: Teh Mardan			Dy. District Officer (M) Pry: Teh Mardan					
[Signature]	30/11/2005	A/Int	[Signature]					
Dy. District Officer (M) Pry: Teh Mardan			Dy. District Officer (M) Pry: Teh Mardan					

2001
OFFICE OF THE ACCOUNTANT GENERAL
PESHAWAR
THE REMOVED BASIC
2100-100-5100 B-5
3000/-
1-12-2001
1-12-2002

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
<i>E.P.S.</i> No 2 Shagan	Sub/off			Rs. 4235/pm		1-12-06	Fazal
—do—				BPS-07 (Rs. 2220-120-5820)			Fazal
—do—				Rs. 2200/pm		30-10-06	Fazal
—do—				Rs. 3620/pm		1-12-06	Fazal
—do—				BPS-07 (Rs. 2555-140-6755)			Fazal
—do—				Rs. 3955/pm		1-7-05	Fazal
—do—				Rs. 4095/pm		1-12-05	Fazal
—do—				Rs. 4235/pm		1-12-06	Fazal
<p>2005 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES OF RS 2555-140-6755 AT RS 3955 P.M.W.E.F. 1-07-2005 With Next Increment on 1-12-2005</p>							
<p>Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p>							
				BPS-07 (Rs. 2940-160-7740)			
"	17			Rs. 4860/pm		1-7-07	Fazal
"	"			Rs. 5020/pm		20-1-07	Fazal
<p>BPS No 12 (Rs. 3620-260-11430)</p>							
"	"			Rs. 5190/pm		1-7-07	Fazal

Rs. 4235/pm
2005-07-12
1-7-11

D.O.
 D.O.
 D.O.
 D.O.

7 Date of appointment	8 Signature of the Government servant attesting in attestation columns 1 to 8	9 Signature and designation of the office or other servant attesting in attestation 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 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			Government to which debitable
2-16-04	Fazal Bajri	[Signature]	29-10-04	Entry Revised	[Signature]				Service verified by [Signature] To [Signature] on the basis of Bill & other records of this Office	
20-11-04	Fazal Bajri	[Signature]		At one	[Signature]				[Signature] MARDAN	
01-12-04	Fazal Bajri	[Signature]		Revised	[Signature]				Appointed against PST vacant Post in B.P. No. 07 (O.R. 2220-120-5820) plus usual increment w.e.f. 30-10-2004 at G.P. Shikaji No. 2 vide C.O. (S&L) Mardan End No. 295-2980/NPP-PST dated 16-10-2004 at Serial No. 1. on Regular Basis	
06-11-04	Fazal Bajri	[Signature]	30-11-05	At one	[Signature]				[Signature] MARDAN	
06-11-04	Fazal Bajri	[Signature]	30-11-06	At one	[Signature]				[Signature] MARDAN	
06-11-04	Fazal Bajri	[Signature]	30-11-07	At one	[Signature]				[Signature] MARDAN	
06-11-04	Fazal Bajri	[Signature]	30-11-08	At one	[Signature]				[Signature] MARDAN	

I hereby request to re-fix my pay after allowing me annual increment on 1-12-2004 on my pre-promotion under para of pay revision Rule.

(Fazal Bajri)

Service verified w.e.f. 1-12-04 To 30-11-05 from the Acq Bill & other records of this Office

[Signature] MARDAN

(15)

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 servant	Signature of Head of the Office or other Officer in Charge of Column 8
	BPS No 12 @ 4355/- 310/- R 13655/-							
C.P.S. Babani	sub. Off.		R 6215/-			12/2008	Rozal/Bayani	
							Rozal/Bayani	
							Rozal/Bayani	
							Rozal/Bayani	
							Rozal	
a	ac		R 6525/-			1/12/08	Rozal/Bayani	
3-17 4869/07	2807 OFFICE OF THE ACCOUNTS N.W.F.P. Peshawar PAY FIXE IN THE REVISED BASIC PAY SCALE 2	GENERAL OFFICER AT RS 2940-160-7740 P.M.W.F.F. With Next Increment on 1-07-2007						
3-12 6079/08	2009 OFFICE OF THE ACCOUNTS N.W.F.P. Peshawar PAY FIXED IN THE REVISED BASIC PAY SCALE 1	OFFICER AT RS 4355-310-13655 P.M.W.F.F. With Next Increment on 1-12-2008						
	Account Officer Pay Fixation Party N.W.F.P. Peshawar	Account Officer Pay Fixation Party N.W.F.P. Peshawar						
			R 6825/-			12/09		
			R 7145/-			12/2010		

9	10	11	12	13		14	15	
				Leave				
Signature and designation of the head of the office or other attesting officer in attestation of column 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 debitible to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or award or praise of the Government Servant.
					Period	Government to which debitible		
D.D.O. (M) Mardan	30/11/08	NA	Mr. D. D. Mardan				Service length 12-05	Since the award of this D.D.O.
MF No. 570/2/11/08	29/11/09							
Drawn by P. & H.R.A. AR in DA								
12/14 to 11/07								
PA (3420-330) (3955-3815) (4095-3955)								
(4235-4095) (4860-4720) — A 50%								
BA (512-4095) (512-4095) — A 60%								
AR — — — — — A 60%								
DA (614-593) (625-614) — A 35%								
MF No. 570/2/11/08								
Drawn by P. & H.R.A. W.E.F. 12/07/09								
Account Awarded B. 12								
Pny. (5199-5070) (6275-5820)								
MAN (6575-6000) — B 42.5%								
TOTAL (482-852) (11206-1059) 6378%								
Additional Director Mardan								
D.D.O. (M) Mardan	30/11/10	A/mrd	D.D.O. (M) Mardan					

AWARD OF BPS 12
 Awarded by S No 12
 wof 01.11.06 by Mr EDO
 (S&L) and in the order
 No. 1054 dt. 16/11/06 S. No 17
 Deputy District Officer
 (Male) Pny. Mardan

UNDERTAKING
 I, Mr. Fazal Qayyum PST give an undertaking to the effect that I will be bound to pay the amount of my pay in the event of my fixation/fixation of my pay in the event of BPS 12

Mr. Fazal Qayyum
 D.D.O. (M) Mardan

Mr. Fazal Qayyum
 give the intimation for fixation/ re-fixation of my pay in BPS No. 12 wof 2.12.2007 in the upgraded scale No. awarded by the EDO/S&L Mardan dt. 11.11.2007
 Enst. No. 1054 dt. 16/11/06 S. No 17

Mr. Fazal Qayyum
 D.D.O. (M) Mardan

Attached to be true copy. Yours

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & EDUCATION) MARDAN

Aux C
17

APPOINTMENT ORDER

Consequent upon the advertisement published in the Daily Mashriq Peshawar dated 07-01-2004 and resulted interview held on 25-02-2004 by the District recruitment/selection Committee. The District Coordination officer Mardan Being Competent Authority is pleased to appoint/approve the following PST (Male) on contract basis for three years only in BPS-07 (Rs. 2220-5820 P.M) plus usual allowances as admissible to them under the rules against the vacant PST Post of school noted against each with effect from the date of their taking over charge in the interest of the service subject to the following existence terms and conditions:

UNION COUNCIL WISE

S No	R.No	Name	Father Name	Name of Union-Council	Grandy Total	Address	Name of school where posted
UC Ato							
				Ato	55.24	Ato	GPS Pipal Bagi Khel
337		Inayat Ullah Shah	Sarwar Shah	Ato	54.55	Bar, Ghum Ato	GPS Pipal Bagi Khel
1246		Muhammad Amir	Muhammad Haleem	Ato	51.06	Ato	GPS Pipal
1173		Fazir Rehman	Fazil Munan	Ato			
UC Babani							
623		Zahid Hussain	Saida Khan	Babani	55.54	Khudai Noor Kili	GPS Babani
				Babani	53.89	Charbanda	GPS Yahya Jadedd
627		Nisar Ahmad	Abdul Sattar	Babani	53.82	Baricham Babani	GPS Khudai Noor Kili
1350		Ishfaq Ahmad	Redad Khan	Babani	53.72	Dhen Kili Mardan	GPS Khudai Noor Kili
1238		Muhammad Ilyas	Mir Muhammad Khan	Babani	52.00	Shagaji Babani	GPS Shankar (Babani)
1273		Akbar Khan	Bacha Khan	Babani	51.96	Babani	GPS Babani
303		Nousher Khan	Rahim Dil Khan	Babani	51.92	Babani	GPS Naseer Kili
1604		Amir Badshah	Gul Badshah	Babani	51.28	Nabir Kili	GPS Naseer Kili
493		Darwesh Khan	Samandar Khan	Babani	51.08	Babani	GPS Naseer Kili
131		Ayaz Khan	Multan Khan	Babani	50.76	Babani	GPS Naseer Kili
455		Rasheed Ahmad	Ali Rahnian	Babani	50.11	Dhen Korona Naseer Kili	GPS Shagai No. 1
1829		Rooh Ullah	Rahim Dad Khan	Babani	49.88	Shankar	GPS Shankar Korona
1070		Fazal Subhan	Noor Gul	Babani	48.99	Naseer Kili	GPS Shagai No 2
2177		Fazil Qayum	Khan Haz	Babani	48.23	Shankar	GPS Shendar
1259		Alan Zeb	Akbar Muhammad	Babani	48.19	Khudai Noor Kili	GPS Shendar
622		Razi Khan	Anwar Khan	Babani	48.05	Khudai Noor Kili	GPS Khudai Noor Kili
1225		Fazle Haq	Fazil Kabi	Babani	47.43	Khudai Noor Kili	GPS Mir Akbar Kili
624		Ishad Mohammad	Anwar Khan	Babani	47.37	Saddar Kili	GPS Mir Akbar Kili
1728		Atta Ullah	Saeed Ullah	Babani			

Principal,
Govt. High School,
Gaddar (Mardan).

Attested to be true copy -
Yours

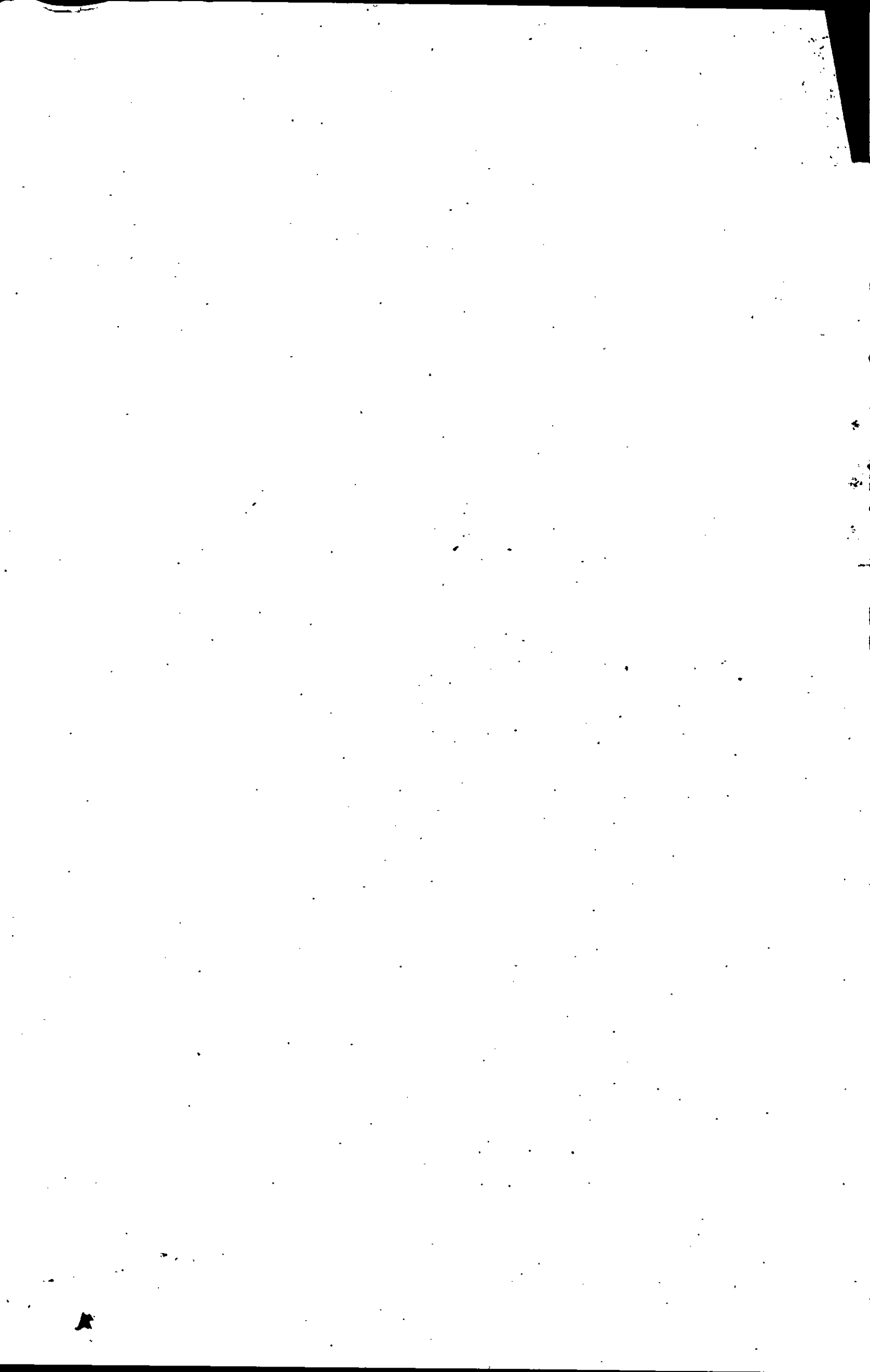
[Handwritten Signature]

357	1621	Muhammad Jamil	Ghulam Nabi	Shamal Pur	48.87	Sowaryan	GPS	Eindous Abad
358	480	Mhiboub ur Rehman	Aziz ur Rehman	Shamal Pur	48.24	Sawar Yan	GPS	Anwar Khan Kili
359	1553	Wali Muhammad	Gul Muhammad	Shamal Pur	48.07	Jabba Miani Khela	GPS	Zor Mandi
UC Shamo Zai								
360	216	Noorul Basar Khan	Mian Zar Khan	Shamo Zai	52.77	Chappal Abad	GPS	Pilagi
361	959	Muhamraiz Khan	Sher Ali Khan	Shamo Zai	52.08	Chappal Abad	GPS	Chappal Abad
362	904	Mohammad Fahir	Zameen Gul	Shamo Zai	51.45	Ghundo	GPS	Chappal Abad
363	901	Bakht Zada	Gul Zada	Shamo Zai	50.95	Ghundo	GPS	Chappal Abad
364	203	Sabaz Ali Shah	Shah Pur	Shamo Zai	50.75	Chappal Abad	GPS	Landi Shah
UC Sher Garh								
365	531	Tahir Mohammad	Mohammad Akbar	Sher Garh	56.18	M. Shah Kaly	GPS	Haji Nadar Sher Kili
366	398	Hakeem Khan	Nousher Khan	Sher Garh	55.21	Sher Garh	GPS	Haji Nadar Sher Kili
367	1452	Asmat Ullah	Abdul Hameed	Sher Garh	54.11	Faqir Abad	GPS	Haji Nadar Sher Kili
368	1317	Muhammad Zubair	Said Zar Khan	Sher Garh	52.10	Babara Sher Garh	GPS	Ahmad Gul Kili
369	585	Hidayat Ullah	Said Azim Khan	Sher Garh	51.67	Faqir Abad	GPS	Ahmad Gul Kili
370	1453	Aziz ur Rahman	Abdul Hameed	Sher Garh	51.46	Faqir Abad	GPS	Khan Muhammad Kili
371	2126	Habib Shah	Awal Shah	Sher Garh	50.82	Sher Garh	GPS	Khan Muhammad Kili
UC Toru								
372	1614	Imtiaz Ali	Muhammad Anwar	Toru	53.61	Toru	GPS	Kala Khel
373	2191	Ashfaq Ahmad	Shamsul Qamar	Toru	53.16	Toru	GPS	Sultan Abad
374	230	Khan Zeb	Aurang Zeb	Toru	51.91	Qursh Kili	GPS	Shoukat Abad
375	1915	Akram Hussain	Muhammad Hussain	Toru	51.56	Nodah Toru Mardan	GPS	Shamshad Abad
376	1498	Muhammad Younas	Khan Bahadar	Toru	53.64	Haji Abad Toru	GPS	Nodah Toru
377	1652	Fazal Wahab	Abdur Raziq	Toru	53.32	Khair Abad	GPS	Shoukat Abad

[Handwritten Signature]

TERMS AND CONDITIONS:-

- 1- Their appointments are made purely on contract basis for three years and are liable to termination at any time without any notice or reason.
- 2- They will perform their duty at the same station during the whole three years contract service.
- 3- Their contract can be renewed after three years if their performance is found excellent as per required polity of the time.
- 4- They are required to produce health and age certificate from the concerned Medical Superintendent before taking over charge.
- 5- They are not allowed to take over charge if their age is less than 18 years and above 38 years.
- 6- They are required to sign contract agreement on judicial paper before taking over charge.
- 7- Their educational/professional certificates/degrees should be verified from the concerned Board/University before drawl of pay and pay should not be released till verification.
- 8- In case of bogus testimonials pointed out later on, F.I.R. will be registered against the candidate concerned.



Attached to be
have copy -
yours

Principal,
Govt. High School,
Gadar, Mardan.

EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN

Director Schools and Literacy NWFP, Peshawar.
District Naam Mardan.
District Coordination Officer Mardan and Talam Bhan.
Deputy District Officers (AI) Mardan and Talam Bhan.
ADO (Primary) Mardan.
District Accounts Officer Mardan.
Candidate concerned.

Copy forwarded to the:-

Encl. No. 9505-2980 / Appnt. PST

Dated: 16/10/2004

(FAZAL RAHBI)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY MARDAN

completion of one year service.

- 9- No TADA is allowed to avail pension gratuity etc as per the recruitment policy of contract employee 2002.
- 10- They are not allowed to avail pension gratuity etc as per the recruitment policy of contract employee 2002.
- 11- They will be governed by contract policy rules, revised by the govt. from time to time.
- 12- In case of non availability of vacancy, the appointment order of the junior most candidate will be withdrawn and an any error in the score, the appointment order of the candidate will also be withdrawn.
- 13- They are entitled for annual increment on completion of 15 days.
- 14- They will take over charge of the post within 15 days.
- 15- They are entitled for annual increment on completion of one year service.

19

Aux D
(20)

A F F I D A V I T.

I, under-signed solemnly affirm and
verify that Respondents department has prepared
the seniority list of PST teachers , Mardan but
my name is not included in the said seniority at
my proper place of seniority on the basis of my
regular appointment of Primary teacher.

Deponent/Appellant. فازل غایم

~~_____~~
Fazal Gayum

Affected
James

Fazal Qayum PST teacher GPS Babaini
Teh: & Dist: Mardan Appellant.

Versus

D.E.O (M), Mardan Respondent.

Appeal against seniority list of
PST Teacher circulated by Respondent,
whereby, the name of appellant stood at
Serial No. instead of S.No.
while appellant was appointed on
which is illegal, against law & facts.

RESPECTFULLY SHEWETH:

1. That appellant is posted as a PST Teacher with Respondent Department.
2. That the appellant has passed PTC Examination in the year and issued PTC Certificate on (Copy attached).
3. That appellant was appointed as E.T. Teacher by Respondent On after completion his all Codal formalities and appellant has taken over charge and served with respondent to the satisfaction of his superior. (Copy of appointment order is attached as Annexure-'B').
4. That appellant has served till today without any break in service of appellant and received his salary till today.

5. That appellant has placed in the seniority list of PST already prepared by respondent at serial No. _____ in the year of _____ (Copy of previous seniority list is attached as Annexure-'C').

6. That presently appellant received his seniority list of PST Teacher on 27.3.2013 wherein, appellant stood at serial No. _____ instead of _____ while appellant was appointed on _____ as per service book of appellant.

(Copy of Service Book of appellant and affidavit to the same effect is attached as Annexure-'D').

7. That appellant was upgraded from BPS-5 to BPS-7 being senior most and qualifide vide order dated 21.2.2011.

(Copy of order is attached as Annexure-"E").

8. That after similarly placed teacher were granted seniority from the date of first appointment, while appellant is ignored, which is clear and crystal discrimination.

It is, therefore, humbly prayed that on acceptance of this Appeal, service of appellant may please be counted from first appointment i.e. _____ and name of appellant may please be placed at S.No. _____ instead of _____ will all back benefit. Any other relief deemed fit may also be graciously awarded.

Appellant

through:

(YADOOB KHAN)

Advocate Distt: Courts, Mdn.

Dated: 5.4.2013.

Attested to be true copy. - [Signature]

بعدالت سرور کٹر پیپول کی

کورٹ فیس

مورخہ: 3 اگست 2013ء منجانب ویلا سٹریٹ

مقدمہ: فضل صوم بنام: ایجوکیشن

دعویٰ: رسیل

جرم:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی
 فضل صوم متعلقہ آن مقام اور کے لئے لغوی طور پر کیا گیا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی تکمیل
 اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور
 اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست
 ہر قسم کی تصدیق و زراس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ
 یا اپیل کی برآمد ہوگی اور منسوخی دائر کرنے کی اپیل گمرانی و نظرتانی و پیروی کرنے
 کا اختیار ہوگا اور بصورت ضرورت مذکور کے عمل یا جزوی کاروائی کے واسطے اور وکیل
 یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ
 بالا اختیارات حاصل ہونگے اور اسکا ساختہ برداختہ منظور و قبول ہوگا اور دوران مقدمہ میں
 جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب
 ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ
 پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ
 دیا تاکہ سندر ہے۔

المرقوم / ماہ اگست 2013ء

بد گواہ شہادہ العہد

_____ کے لئے منقول ہے۔

Attested & Alleged

Yaqub

بمقام:

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

Appeal No. _____/2013.

Fazal Qaum vs Director of Education
of KPK, Peshawar.


Subject :- Application for Placing on file
upgradation order of appellant from
BPS- 7 to BPS -12.

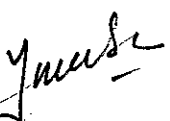
R/Sheweth :-

1. That above captioned case is fixed for today.
2. That appellant is upgraded/promoted from
BPS- 7 to B PS-12 on the basis of finance
letter dated: 16-07-2012.
(Copy of order is attached)
3. That instant document is necessary document
for instant case, which may please be placed
on file ^{for} further proceeding of the case.

It is therefore, humbly requested, that
upgradation order of appellant may please be
placed on file.

Dated : 15-05-2014


Appellant

Through Counsel 
Yaqub Khan Advocate
High Court At Distt :
Courts Mardan.

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

Appeal No. _____/2013.

Fazal Qaum vs Director of Education
of KPK, Peshawar.


Subject :- Application for Placing on file
upgradation order of appellant from
BPS- 7 to BPS -12.


R/Sheweth :-

1. That above captioned case is fixed for today.
2. That appellant is upgraded/promoted from
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letter dated: 16-07-2012.
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for instant case, which may please be placed
on file ^{for} further proceeding of the case.

It is therefore, humbly requested, that
upgradation order of appellant may please be
placed on file.

Dated : 15-05-2014


Appellant

Through Counsel 
Yaqub Khan Advocate
High Court At Distt :
Courts Mardan.

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

Appeal No. _____/2013.

Fazal Qaum vs Director of Education
of KPK, Peshawar.

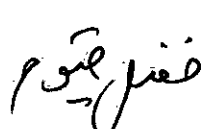
Subject :- Application for Placing on file
upgradation order of appellant from
BPS- 7 to BPS. -12.

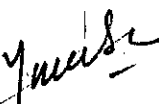
R/Sheweth :-

1. That above captioned case is fixed for today.
2. That appellant is upgraded/promoted from
BPS- 7 to B PS-12 on the basis of finance
letter dated: 16-07-2012.
(Copy of order is attached)
3. That instant document is necessary document
for instant case, which may please be placed
on file ^{for} further proceeding of the case.

It is therefore, humbly requested, that
upgradation order of appellant may please be
placed on file.

Dated : 15-05-2014


Appellant

Through Counsel 
Yaqub Khan Advocate
High Court At Distt :
Courts Mardan.

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR .

Appeal No. _____/2013.

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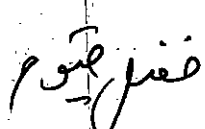
Subject :- Application for Placing on file
upgradation order of appellant from
BPS- 7 to BPS -12.


R/Sheweth :-

1. That above captioned case is fixed for today.
2. That appellant is upgraded/promoted from
BPS- 7 to B PS-12 on the basis of finance
letter dated: 16-07-2012.
(Copy of order is attached)
3. That instant document is necessary document
for instant case, which may please be placed
on file ^{for} further proceeding of the case.

It is therefore, humbly requested, that
upgradation order of appellant may please be
placed on file.

Dated : 15-05-2014


Appellant

Through Counsel 
Yaqub Khan Advocate
High Court At Distt :
Courts Mardan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1310 / 2013

Fazal Qayum S/O Khan Baz PST GPS Shagai No. 2, Mardan R/O Vill; Nasir Kili Tehsil
& District Mardan.....Appellant

Versus

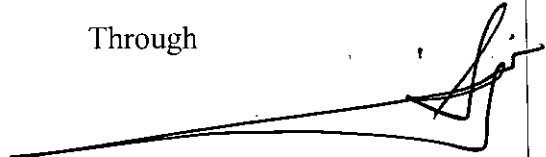
Director Education K.P.K. Peshawar & Other.....Respondents

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit		01	03
2.	Copy of Service Book	"A"	04	10

Respondents

Through



District Education Officer
(Male) Mardan

Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1310 / 2013

Fazal Qayum S/O Khan Baz PST GPS Shagai No. 2, Mardan R/O Vill; Nasir Kili Tehsil
& District Mardan.....Appellant

Versus

Director Education K.P.K. Peshawar & Other.....Respondents

Para wise comments on behalf of Respondents.

Respectfully Sheweth,

PRELIMINARY OBJECTION:

1. That the appellant has got no cause of action and locus standi to file the instant appeal.
2. That the instant appeal is incompetent in its present form, hence liable to be dismissed.
3. That the instant appeal is badly time barred.
4. That the appellant has not come to this Honourable Tribunal with clean hands.
5. That the appeal is not maintainable in its present form.
6. That the appellant is estopped by his own conduct.
7. That the appellant has concealed the material facts from this Honourable tribunal hence liable to be dismissed.
8. That the instant appeal is based on malafide intention, hence liable to be dismissed.
9. That the instant appeal is against the prevailing law and rules.
10. That the appellant has been treated as per law & rules.
11. That the appellant was serving as Elementary Teacher and appointed against PST post BPS-07 vide Endst No 2595-2980/ Apptt:/PST dated on 16-10-2004 accordingly. (Copy of Service Book is attached **Annex-“A”**)
12. That the seniority list of the different cadres prepared according to the rules and seniority cum fitness as having prescribed service duration and requisite professional qualification of the post in hand.
13. That the seniority of the Primary School Teacher were considered from having requisite professional qualification prescribed for initial recruitment of PST from taking over of the charge against the said post.

FACTUAL OBJECTIONS:

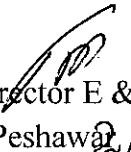
1. Para No 1 is incorrect baseless against fact and law, as the appellant was initially appointed as Elementary Teacher in the Education Department, and was appointed against PST post on 16-10-2004, hence denied.
2. Para No 2 pertains to record, hence no comments.
3. Para No 3 is correct to the extent that the appellant was appointed as elementary teacher being untrained at that time, hence no comments.

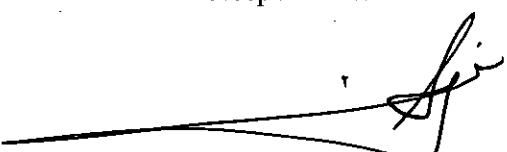
- 4. Para No 4 pertains to record, as thoroughly explained supra in the preliminary objections, hence need no comments.
- 5. Para no 5 is incorrect, as thoroughly explained supra in the preliminary objections, hence denied.
- 6. Para No 6 is incorrect, as thoroughly explained supra in preliminary objection the criteria for seniority is to be considered from the date of appointment on a requisite post accordingly, while the appellant was appointed against PST post on 16-10-2004. So, the seniority would be maintained from 16-10-2004 being appointment date of the appellant as PST, hence denied.
- 7. Para No 7 pertains to record, hence need no comments.
- 8. That the detailed reply of the ground has been given below.

GROUNDS:

- A. Para A is incorrect baseless against fact, the appellant was appointed as Elementary Teacher on 19-04-1993 being untrained it is important to mention that upon declaration of Elementary Cadre was appointed against PST post on 16-10-2004. So, the seniority would be maintained from 16-10-2004 being appointment date of the appellant as PST, hence denied.
- B. Para B is incorrect, baseless and the respondents by following the seniority rules, prepared the seniority list, hence denied.
- C. Para C is incorrect, as thoroughly explained supra, hence need no comments.

Therefore it is humbly prayed that keeping in view the above mentioned facts the instant appeal may kindly be dismissed with cost.


 Director E & SE
 Peshawar
 14/11/2016

Respondents

 District Education Officer
 (Male) Mardan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1310 / 2013

Fazal Qayum S/O Khan Baz PST GPS Shagai No. 2, Mardan R/O Vill; Nasir Kili Tehsil
& District Mardan.....Appellant

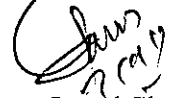
Versus

Director Education K.P.K. Peshawar & Other.....Respondents

AFFIDAVIT

I, Mr Javed Shah Legal Advisor Education Department Mardan do hereby solemnly affirm and
declare that the contents of Para Wise Comments submitted by Respondents are true to the best
of my knowledge and belief and nothing has been concealed from this Honourable Court.

Deponent



Javed Shah

16101-8562610-3

Annex 'A'

(For use in Police Department only).

① Passed S.S.C. (A) Examination 1980 from B.I.E. Peshawar under Roll no 26081 obtaining 368/650 marks in Grade "C"
Heirs,
The result declared on 30-8-1980

Sub Div. Education Officer: (M) Mardan

② Passed mathematics only from B.I.E. Peshawar Under Roll no 14176 obtaining $\frac{33}{100}$ marks

Sub Div. Education Officer: (M) Mardan received back

③ Passed F.A. (S) Examination 1982 from B.I.E. Peshawar under Roll no 9933 obtaining 431 marks in Grade "D"
The result declared on 8-1-1983

Sub Div. Education Officer: (M) Mardan
Left thumb-impression

④ Passed P.A. (T.Y.C) Examination 1993 Annual from the University of Peshawar under R.No 55329 securing 285/550 (Two hundred eighty five). Entry made on the basis of D.T.C. Result declared on 17-3-1994

Qualification	Date	Qualifications	Date
English Passed P.T.C Examination 1996 from R.D.F Peshawar Under Roll No 6222 marks obtained 629/1200 Pashtu He has been placed in 11th division Urdu Result declared on 13-5-97.		First Arts (Male) Mardan, (M)	
Plan-drawing	L.D.E.O. (M) MARDAN.	B. L. or B. A.	
Finger print		Pleadership examination	
Passed M.A Examination (M.A. Peshko) from University of Peshawar Session 2003 (Annual) under Roll No. 24947, Securing 496/1100 Marks and placed in 2nd Division.		Training School Final examination	
Court duties Result Declaration 28-1-2004.		Other qualifications—	
Reserve duties			

Dy. District Officer (M) Peshawar

Supt. Executive Distt. Officer (E.S.) Peshawar

No. of line to be drawn under the qualification possessed.

Entries in 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 *MR. FAZAL - DAYUM.*

2. Race

Afghan.

3. Residence

*Nabis Kelli
Hamza Khan (Mardan)*

4. Father's name and residence

MR. KHAN. BAZ.

5. Date of birth by Christian era as nearly as can be ascertained

1-4-1965

1st April N.H. of Sixty Five.

6. Exact height by measurement

5'7"

7. Personal marks for identification

mole on the left side of nose.

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

Little Finger.

Ring Finger

Middle Finger.

Fore Finger

Thumb.

9. Signature of Government servant.

Fozal Dayum

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

[Signature]
Sub-Divisional Education
Officer, (E&S) Mardan

[Signature]
Sub-Divisional
Executive In-charge Officer
(E&S) Education Mardan

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether appointment or temporary	If officiating, (i) substantive or (ii) whether appointment, or service counts for pension under Art. 371 C.S. II.	Pay in substantive post	Additional Pay for officiating	Other emoluments falling under "Pay"	Date of appointment	Signature of Government servant
Elementary teacher		B.P.S No 5. Rs 1035-49-1770				20.4.93	Prof. Dogra
GES. Koofi. Abad.	Sub. Gt.	Rs. 1035/- P.M.				1.12.92	Govt. Baramulla
-do-	-do-	Rs. 1084/-				1.12.92	Govt. Baramulla
		B.P.S. No 5 (Rs. 1400-66-2390)					
-do-	-do-	Rs. 1466/-				1.6.94	Govt. Baramulla
-do-	-do-	Rs. 1533/-				1.12.96	Govt. Baramulla
-do-	-do-	Rs. 1598/-				1.12.95	Govt. Baramulla
-do-	-do-	Rs. 1664/-				1.12.96	Govt. Baramulla
Retiree		Rs. 1739/-				1.12.97	Govt. Baramulla
Services Rules							
for in post of E/Teacher							
-do-	-do-	Rs. 1796/-				1.9.98	Govt. Baramulla
-do-	-do-	Rs. 1862/- P.M.				1.12.99	Govt. Baramulla
-do-	-do-	Rs. 1928/- P.M.				1.12.2000	Govt. Baramulla

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 Governor General
S. K. Kochi	Sub/Off		R. 1984/- PM			12/21	F. Day
do	do	BPS-5C 2100-100-5(100)	R. 3000/- PM			12/21	F. Day
do	do		R. 3100/- PM			12/2002	F. Day
do	do		R. 3200/- PM			12/2003	F. Day
BPS No: 7 @ R. (2220-120-500)							
P.T.C.							
C.P.S. No. 12 Shagni	do		R. 3300/- PM			AN. 30/04	F. Day
do	do		R. 3400/- PM			01/12/04	F. Day
<div data-bbox="359 1656 893 2089" data-label="Text"> <p>(1994) Office of the Accountant General Pay Fixd by the Govt. of Karnataka scale 1994 of Rs. 1400-66-2390-5 as per 1466/- with head...</p> </div>							
BPS No. 67 @ R. 2555-100-6750							
3	do		R. 3955/-			01/2005	F. Day
4	do		R. 4095/-			01/2005	F. Day

10 Name of the office or attestation nos 1 to 8	11 Date of termination of appointment	12 Reason of termination (such as promotion, transfer, dismissal, etc).	13 Signature of the head of the office or other attesting officer	14 Leave		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	
<i>[Signature]</i> Dy. D.O. (M) Dy. D.O. (M) Pry: Mardan	30/11/2001	Rs Revised	<i>[Signature]</i> Dy. D.O. (M) Pry: Mardan			Service Verified From Acquittance Roll and other school record from 12/11/99 to 30/11/99
<i>[Signature]</i> Dy. D.O. (M) Mardan	30/11/2002	A/M	<i>[Signature]</i> Dy. D.O. (M) Pry: Mardan			Sub Office Education, Mardan
<i>[Signature]</i> Dy. D.O. (M) Mardan	30/11/2002	H/W	<i>[Signature]</i> Dy. D.O. (M) Pry: Mardan			Service Verified from Acq: Roll & T... office record. 12/99 to 30/11/2000
<i>[Signature]</i> Dy. D.O. (M) Mardan	30/10/04	Appointed PTC	<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan			<i>[Signature]</i> Dy. D.O. (M) Mardan
<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan	30/11/2001	A/Int	<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan			Service Verified w.e.f. 12/2001 to 30/11/2001 From the Acq Roll & other record of This office.
<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan	30/06/2005	Pay Revised	<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan			<i>[Signature]</i> Dy. D.O. (M) Pry: Mardan
<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan	30/11/2001	A/Int	<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan			Service Verified w.e.f. 12/2001 to 30/11/2002 From the Acq Roll & other record of This office.
<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan	30/11/2005	A/Int	<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan			Service Verified w.e.f. 12/2002 to 30/11/2003 From the Acq Roll & other record of This office.
<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan	30/11/05	A/Int	<i>[Signature]</i> Dy. District Officer (M) Pry: Teh Mardan			<i>[Signature]</i> Dy. D.O. (M) Pry: Mardan

2001
OFFICE OF THE ACCOUNTANT GENERAL
PESHAWAR
IN THE REGISTERED BASIC
2100-100-5100 B-5
3000/-
12/2001
1-1-2002

[Signature]
Supt:
Executive Distt: Officer
(E&S) Edu: Mardan

1	2	3	4	5	6	
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
CPS No 2 Shergau	800/00		Rs. 4235/pm			1-12-06
do		BPS-07	(Rs. 2220-120-5820)	Rs. 2300/pm		3-1-08
do			Rs. 3620/pm			1-12-04
do		BPS-07	(Rs. 555-140-6755)	Rs. 3955/pm		1-7-05
do			Rs. 4095/pm			1-12-05
do			Rs. 4235/pm			1-12-06
2005						
OFFICE OF THE ACCOUNTANT GENERAL						
N.W.F.P. PESHAWAR						
PAY FIXED IN THE REVISED BASIC PAY SCALES						
OF RS. 2555-140-6255						
AT RS. 3955 PM. W.E.F. 1-07-2005						
With Next Increment on 1-12-2005						
<div style="display: flex; justify-content: space-between;"> <div> <p>Accounts Officer</p> <p>Pay Fixation Party</p> </div> <div> <p>1-07-2005</p> <p>1-12-2005</p> </div> </div>						
BPS	07	(Rs. 2940-160-7740)				1-7-07
"	17		Rs. 4860/pm			1-12-07
"	"		Rs. 5020/pm			1-12-07
BPS No 120	N	Rs. 3630-260-11430	J			1-12-07
"	"	Rs. 5190/pm				1-12-07

10 Name of the office or posting attachment nos 1 to 8	11 Date of termination of appointment	12 Reason of termination (such as promotion, transfer, dismissal, etc).	13 Signature of the head of the office or other attesting officer	Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or award 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 debit to another Government		
				Period	Government to which debit		
<i>[Signature]</i> D.D.O. (M)	29-10-04	Entry Renewal	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	01/12/2003 Service verified w.e.f. 30-11-04 from the Acct Roll & other records of this office
<i>[Signature]</i> D.D.O. (M)	30-11-05	Pay Revision	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	MARDAN
<i>[Signature]</i> D.D.O. (M)	30-11-05	Pay Revision	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	Appointed against PST vacant post in Bp: No. 07 (DRs. 2220-120-5820) plus usual increment w.e.f. 30-10-2004 at G.P. Stage No. 2 vide C.D.O (S&L) Mardan Enst No. 2595-2980/APP-PST dated 16-10-2004 at Serial No. 1 on Regular Basis
<i>[Signature]</i> D.D.O. (M)	30-11-05	Pay Revision	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	option
<p>I hereby upto to re-fix my pay after allowing me annual increment on 1-12-2004 on my pre-promotion under para of pay revision Rule</p>							
<i>[Signature]</i> D.D.O. (M)	30-11-07	Pay Revision	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	Regular Basis
<i>[Signature]</i> D.D.O. (M)	12-07	Pay Revision	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	Service verified w.e.f. 1-12-04 30-11-05 from the Acct Roll & other records of this office
<i>[Signature]</i> D.D.O. (M)	30-6-08	Pay Revision	<i>[Signature]</i> D.D.O. (M)			<i>[Signature]</i> D.D.O. (M)	MARDAN

[Signature]
 Supt:
 Executive Distt. Officer
 (E&S) Edu: Mardan

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
	BPS No 12 @ 4355/- 310/- (R 13655/-)						
CPS Babani	sub offi		R 6215/-			12/2008	F-23
							F-24
							F-25
							F-26
							F-27
							F-28
							F-29
							F-30
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							F-100

3-7
4860/07
6215/08

2007
OFFICE OF THE ACCOUNTANT GENERAL
N.W.F.P. PESHAWAR
PAY FIXED IN THE REVISED BASIC
PAY SCALES 1
OF RS 2940-160-7740
AT RS 4860 P.M.W.F.F. 1-07-2007
With Next Increment on 1-2-2007

2008
OFFICE OF THE ACCOUNTANT GENERAL
N.W.F.P. PESHAWAR
PAY FIXED IN THE REVISED BASIC
PAY SCALES 1
OF RS 4355-310-13655
AT RS 6215 P.M.W.F.F. 1-07-2008
With Next Increment on 1-2-2008

Accounts Officer
Pay Fixation Party N.W.F.P. Peshawar

Accounts Officer
Pay Fixation Party N.W.F.P. Peshawar

R 6835/-
R 7145/-

12/1/09
12/2/10

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 debit to another Government			
				Period	Government to which debit		
<p>Ad of the Office or posting (Specification Nos 1 to 8)</p> <p>D.O. (M) 30/11/09</p>	<p>Date of termination of appointment</p> <p>30/11/09</p>	<p>Reason of termination (such as promotion, transfer, dismissal, etc.)</p> <p>AT</p>	<p>Signature of the head of the office or other attesting officer</p> <p>[Signature]</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government</p>	<p>Signature of the head of the office or other attesting officer</p> <p>[Signature]</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant.</p> <p>1-12-05</p>
<p>D.O. (M) 30/11/09</p> <p>MF No. 523 Dt. 10/2/09</p> <p>Drawn by S. H.A. W.E.F. 12/7/09</p> <p>Account Awarded B. 1.2</p> <p>Pay (S. 19.5 - 50.20) (S. 1.5 - S. 8.10)</p> <p>(S. 7.5 - 6.00) — B. 4245/</p> <p>TOTAL (S. 19.5 - 8.10) (S. 2.06 - 10.59) B. 3178/</p> <p>Additional District Officer Mardan</p>	<p>30/11/09</p>	<p>AT</p>	<p>[Signature]</p>	<p>Period</p>	<p>Government to which debit</p>	<p>[Signature]</p>	<p>1-12-05</p>
<p>D.O. (M) 30/11/09</p> <p>MF No. 523 Dt. 10/2/09</p> <p>Drawn by S. H.A. W.E.F. 12/7/09</p> <p>Account Awarded B. 1.2</p> <p>Pay (S. 19.5 - 50.20) (S. 1.5 - S. 8.10)</p> <p>(S. 7.5 - 6.00) — B. 4245/</p> <p>TOTAL (S. 19.5 - 8.10) (S. 2.06 - 10.59) B. 3178/</p> <p>Additional District Officer Mardan</p>	<p>30/11/09</p>	<p>AT</p>	<p>[Signature]</p>	<p>Period</p>	<p>Government to which debit</p>	<p>[Signature]</p>	<p>1-12-05</p>
<p>D.O. (M) 30/11/09</p> <p>MF No. 523 Dt. 10/2/09</p> <p>Drawn by S. H.A. W.E.F. 12/7/09</p> <p>Account Awarded B. 1.2</p> <p>Pay (S. 19.5 - 50.20) (S. 1.5 - S. 8.10)</p> <p>(S. 7.5 - 6.00) — B. 4245/</p> <p>TOTAL (S. 19.5 - 8.10) (S. 2.06 - 10.59) B. 3178/</p> <p>Additional District Officer Mardan</p>	<p>30/11/09</p>	<p>AT</p>	<p>[Signature]</p>	<p>Period</p>	<p>Government to which debit</p>	<p>[Signature]</p>	<p>1-12-05</p>
<p>D.O. (M) 30/11/09</p> <p>MF No. 523 Dt. 10/2/09</p> <p>Drawn by S. H.A. W.E.F. 12/7/09</p> <p>Account Awarded B. 1.2</p> <p>Pay (S. 19.5 - 50.20) (S. 1.5 - S. 8.10)</p> <p>(S. 7.5 - 6.00) — B. 4245/</p> <p>TOTAL (S. 19.5 - 8.10) (S. 2.06 - 10.59) B. 3178/</p> <p>Additional District Officer Mardan</p>	<p>30/11/09</p>	<p>AT</p>	<p>[Signature]</p>	<p>Period</p>	<p>Government to which debit</p>	<p>[Signature]</p>	<p>1-12-05</p>

AWARD OF BPS 12
 Awarded BPS No 12
 w.e.f 01.10.2007 by the EDO (S&L) Mardan vide order No. 6055 dt. 18/6/07 at S.No 17

Deputy District Officer (M&G) Piry: Mardan

UNDEXTAKING
 I, Mr. Razal Baxter give an undertaking to the effect that I will be bound to attend the work assigned if made to take a leave of functional fixation of my pay in the award of BPS 12

Name: Razal Baxter
 Signature: [Signature]

D.D.O. (M)
 Mardan

OPTION
 Mr. Razal Baxter give the option for fixation/ re-fixation of my pay in BPS No. 12 w.e.f 2.12.2007 in the upgraded scale No awarded by the EDO/S&L Mardan vide order No. 6055 dt. 18/6/07 at S.No 17

Name: Razal Baxter
 Signature: [Signature]

D.D.O. (M)
 Mardan

[Signature]
 Executive District Officer (E&S) Mardan

1	2	3	4	5	6	7
Name of post	Whether subaltern or officiating and whether permanent or temporary	If officiating: (i) substantive appointment, or (ii) whether for position under Art. 371 C.S.R.	Pay in subaltern post	Additional Pay for officiating	Other emolument falling under the "salary"	Date of appointment
BAPS			RS 1150/-			1.7.11
BABRAM			RS 1200/-			1.12.11
			RS 12500/-			1.12.12
			RS 1300/-			1.12.13
ENTRIES KEPT DUE TO THE MATRUL IN GRADUATION WITH MC			RS 2400/-			1.12.13
			RS 500/-			1.12.17
			RS 3600/-			1.12.17
			RS 5450/-			2.12.17
			RS 4355-310-13655			1.7.08
			RS 6525/-			1.12.08
			RS 6835/-			1.12.08
			RS 7145/-			1.12.09
			RS 7455/-			1.12.10
			RS 12000/-			1.7.11
			RS 12500/-			1.12.11
			RS 13000/-			1.12.12
			RS 13500/-			1.12.13

Signature
Coverd
ACTVA

10	11	12	13	14		15
				Leave		
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	
		Signature of the head of the office or other attesting officer	Signature of the head of the office or other attesting officer			
S.D.D.O. (M) MARDAN	30/11/17	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/12	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/13	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	2/12/07	Awarded B-12 pay	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/08	Revised	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/08	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/09	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/12	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/11	Pay Revised	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/11	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/12	A/m	S.D.D.O. (M) MARDAN			
S.D.D.O. (M) MARDAN	30/11/13	A/m	S.D.D.O. (M) MARDAN			
AR 11						

Awarded Promoter pay on re-gradation with no arrears order to 30-5-14 vide FD (RW) No. FD-SR-1/2-123/14 dated 30-5-2014

Suspension order

Suspended from service w.e.f. 22-9-2013 under PPC 506-148-13 dt 22-9 police Station Jabbar Mardan vide DDO Com. No. 820/STAB/10/05-04-11/11/3

G. PR Advance No - B. 16000 - TR No 90 dt 5/8/15
Sec No 4911/9 dt 20/2/14

Sub Div: Edu: Officer
(Mare) Mardan

Supdt:
Executive Dist: Officer
(EXS) E-Mardan

