

①

copy. 1

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR CAMP COURT ABBOTTABD.**

SERVICE APPEAL NO. 98/2023

Mst Mubeen Akhtar D/O Khushal khan GGPS Tarmuthian, circle berote tehsil and district
Abbottabad.....APPELLANT

VS

GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY EDUCATION
DEPARTMENT PESHAWAR & OTHERS.....RESPONDENTS

COMMENTS ON BEHALF OF RESPONDENT NO 1, 2 & 3

INDEX

S. No	Description	Annexure	Page-No.
1	Para Wise Comments And Affidavit		1-8
2	copy of service book page 8 & 9 are annexed as annexure	A	9-10
3	copy of service book page 11 & 12 are annexed as annexure	B	11-12
4	copy of service book page no 20 is annexed as annexure	C	13
5	vide service book page no 23 & 24 as annexed as annexure	D	14-15
6	vide record of service book and pay roll/ pay adjustment of district account office are annexed as annexure	E	16-17
7	vide page No 22 of service book is annexed as annexure	F	18
8	vide notification No:FD.SO (PRC)/1-2/27 Finance Department Dated 30 may 2014, which is already placed on file is annexed as annexure	G	19

2

10	vide page No 21 of service book annexed as annexure	H	20
10	vide respondent letter No 1122-26 dated 18/02/2023 & vide notification No SO(SR-IVVFD/1-2/conveyance allowance/2023 dated 16 feb 2021 are annexed as annexure	I	21-25

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

RESPONDENT NO: 73
District Education Officer
(Female) Abbottabad

Copies received
Ch: Abdur Rauf Chohan
advocate, of Petitioner

Received

26/07/2023

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR CAMP COURT ABBOTTABAD

Appeal No. 98/2023

MST MUBEEN AKHTAR D/O KHUSHAL KHAN GGPS TARMUTHIAN, CIRCLE BEROTE
TEHSIL AND DISTRICT

ABBOTTABAD..... APPELLANT.

VS

1. GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY E&S
DEPARTMENT PESHAWAR
2. DIRECTOR ELEMENTARY AND HIGHER SECONDARY EDUCATION PESHAWAR
3. DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

..... RESPONDENTS.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7702

Dated 20/09/23

Para wise comments on behalf of the respondent no 1, 2 and 3 are as under

Respectfully sheweth;

Preliminary objections

1. That the appellant has no locus standi/cause of action to file instant appeal.
2. That the appellant is stopped to agitate the instant matter before this Honorable Tribunal.
3. That the appellant has not approached this Honorable Tribunal with clean hands.
4. That the appellant has filed instant appeal with malafide intention for wrongful gain and suppressing the original facts, from this Honorable Tribunal, hence the appeal is liable to be dismissed.
5. That the appeal is hopelessly time barred.
6. That the appellant is treated as per rules and law and policy. Therefore appellant is not entitled for any relief and hence appeal is liable to be dismissed without further proceeding.
7. That the appellant has filed the service appeal to pressurize the respondent to gain the unlawful benefits.
8. That the instant appeal is not maintainable in its present form.

9. That the instant appeal is against the law/service rules hence not maintainable in the eye of law and liable to be dismissed.
10. That the appellant had already been received pay and allowances under the service book/law, rule and policy while conveyance allowance has already been generalized by the deptt vide letter No 1127 dated 08/10/2022

Factual Objection

1. Para No 1 of service appeal as composed is incorrect, hence denied.
Appellant was appointed as PST, BPS 07 on 31/10/1988.
2. Para No 2 of service appeal is incorrect, hence denied. Appellant awarded BPS 08 from BPS 07 in the light of order as well as service book Page 08 & 09 copy of service book page 8 & 9 are annexed as annexure "A" while rest of the reply is in Para 08 of reply of Service Appeal.
3. Para No 3 of Service Appeal is incorrect to the extent of move over to BPS 08 while arrears of move over in BPS 8 drawn in Para 2 pages 9 of service book as mentioned above.
4. Para No 4 of the service appeal is correct to the extent of awarded of BPS 12 in light of order and service book page 11&12 copy of service book page 11 & 12 are annexed as annexure "B".
5. Para No 5 of the service appeal is correct to the extent of promotion of appellant on PST, BPS 12 to SPST, BPS 14 vide order 01/02/2013, while rest of the Para as composed is incorrect, hence denied. Appellant was promoted from SPST, BPS 15 VIDE ORDER No 1261-67 dated 02/03/2013 but she refuse and wave of right of promotion, therefore she was again adjusted/fixed in SPST BPS 14 vide order dated 02/03/2013 copy of service book page no 20 is annexed as annexure "C", subsequently appellant was promoted PSHT, BPS 15 vide Endst No 4227-32 dated 31/05/2018, salary and other emolument were activated on 01/06/2018 vide service book page no 23 & 24 as annexed as annexure "D", she already received the arrears during the period of 01/02/2013 to 01/04/2017 from govt. exchequer vide record of service book and pay roll/ pay adjustment of district account office are annexed as annexure "E".
6. Para No 6 of the service appeal is incorrect, hence denied. The premature increment was awarded to the appellant vide page No 22 of service book is annexed as annexure "F", more over appellant is not entitled for the arrears vide notification No:FD.SO (PRC)/1-2/27 Finance Department Dated 30 may 2014, which is already placed on file is annexed as annexure "G".

7. Para No 7 of the service appeal is correct to the extent of award of selection vide BPS 10 w.e.f 01/07/1998 in the light of judgment dated 18/10/2016 **vide SELECTION GRADE ORDER ENDST NO:1643-46 dated 02/03/2017**. while condition No 3 of order "the arrear to this effect should be drawn w.e.f 18/10/2016, the date of passing the judgment of the honorable Peshawar high court, while appellant withdrawal of arrears **vide page No 21 of service book annexed as annexure "H"** Which was admitted by the appellant..
8. Para No 8 of the service appeal, the detailed reply have already been given in para No 7 of comments, hence no comment.
9. Para No 9 of the Service appeal as composed is incorrect, hence denied. Respondent already circulated the letter regarding payment of conveyance allowance during the summer and winter vacation **vide respondent letter No 1122-26 dated 18/02/2023 & vide notification No SO(SR-IVVFD/1-2/conveyance allowance/2023 dated 16 feb 2021 are annexed as annexure "I"**.
10. para 10 of the service appeal as compared is incorrect, hence denied. The department of representation/appeal is hopelessly time barred.

GROUNDS:

- A. Para of the C ground as composed is incorrect hence denied however the appellant has already received pay and allowances/ Arrears from Govt. Exchequer in the right of service book, pay roll and pay arrears .Hence appeal of appellant under the law is not maintainable, therefore appeal in hand may kindly be struck down.
- B. Para of the ground as composed is incorrect hence denied there is no discrimination. The appellant has already been received arrears regarding selection grade, premature increment and pay and allowances vide service book , pay roll allowances adjustment maintained by the education department as well as accounts department as well, being public documents she already admitted and signed on the above mentioned arrears ,allowances and adjustment. Respondent already circulated notification regarding conveyance allowance while she did not

(6)

communicate to district account office for her arrears, therefore for

appeal in hand may kindly be struck down.

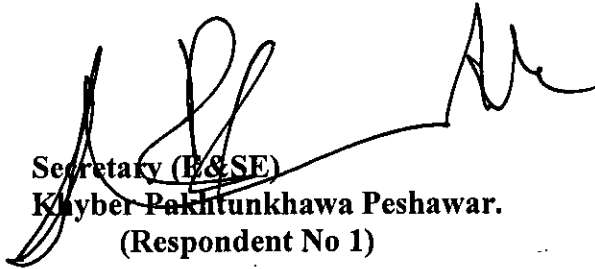
C. Para of the C of the ground as composed is incorrect hence denied respondent are law abiding citizen and implement the judgments in letter and spirit whole heartedly, appellant received the dues and other emoluments during her service, therefore the plea of the appellant is hit under the law of limitation, estoppel and equicence hence liable to be dismissed.

D. Para of the D of the ground as composed is incorrect , hence denied plea of the appellant is frivolous, hence may be struck down.


I. Para I of the ground as composed is incorrect detail reply has been given in facts.

F. Para F of the ground is incorrect, hence denied. Departmental appeal of the appellant is time barred under the limitation act as well as principle of estoppel, therefore the service appeal of the appellant is hopelessly time bard hence liable to be dismissed.

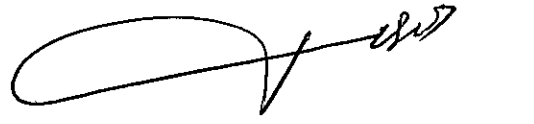
It is therefore humbly prayed that in the light of foregoing comments the appeal may graciously be dismissed with cost throughout.



Secretary (E & SE)
Khyber Pakhtunkhawa Peshawar.
(Respondent No 1)



Director (E & SE)
Khyber Pakhtunkhawa Peshawar.
(Respondent No 2)



District Education Officer
(Female) Abbottabad
(Respondent No 3)
District Education Officer
(Female) Abbottabad

Before the Honorable Service Tribunal KPK Peshawar,

Camp Court Abbottabad

Mubeen Akhtar.....Appellant

VS

Govt of Kpk and others.....Respondents

AFFIDAVIT

I Mst Nighat Bibi Deputy District Education Officer (Female) Abbottabad stated on oath that the contents of Para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Through ADEO (Litigation)

DEPONENT

Nighat Bibi

Dy: District Education Officer
(F) Abbottabad

Dy District Education Officer
(Female) Abbottabad

It is further stated on oath in this appeal answer respondents neither struck 26/2/2023 of defence, nor imposition of cost.



1	2	3	4	5	6	7	8
Year	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 G. S. R.	Pay in substantive post	Additional Pay for officiating	Other allowances falling under the term 'Pay'	Date of appointment	Signature of Government servant

PTC GIGRS
 1975-76 AD
 Perm/Off
 Rs 4880/-
 12/2004

(Handwritten notes)
 2000-120-5820 B-7
 4140/-
 M. Shah
 District Education Officer

1976-77 AD
 Perm/Off
 Rs 2770/-
 2220-120-5820

PTC GIGRS
 1977-78 AD
 Perm/Off
 Rs 4140/-
 Rs 4260/-

District Education Officer
 P. E. M. A. S. S.

11	12	13	14	15
Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government	Signature of the head of the office or other attesting officer
		Nationality of leave taker	Period to which Government is liable	Reference to any special punishment or censure, or award or prize of the Government

Kabir
31/12/2004

Allowed promotion B-8

Kabir
D7100

Other...
R.A.

(1991)
 Office of the Accountant General
 N. W. F. P. Peshawar.
 Pay fixed in the revised scale payable 1994
 of Rs. 81,268/- (1994)
 of Rs. 1,96,687/- (1994)
 with next increment on 1-12-1994

Accounts Officer
 The Frontier Party N. W. F. P. Peshawar

Allowed promotion B-8 under DCO...
1/12/2004

D7100
Kabir

Drawn Advance of m/over (B-8)
12/31/05
T-7114/10-06-05

2. (FAS)

(2001)
 Office of the Accountant General
 N. W. F. P. Peshawar.
 Pay fixed in the revised scale payable 2001
 of Rs. 1,20,000/- (2001)
 of Rs. 2,12,000/- (2001)
 with next increment on 1-12-2001

Accounts Officer
 The Frontier Party N. W. F. P. Peshawar

Handwritten signature and notes

Kabir
01/12/2004

Allowed promotion

Kabir
D7100

Handwritten notes on the left margin

17 April 15

10 Name and position of the office or other attesting authority in attestation column 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 servant	
				Period	Government to which debitable	
Dehonra 07100	30/04	Appl	Dehonra 07100			3-69 12/7/66 Pay not taken any day
Dehonra 07100	30/05	Scale Reached	Dehonra 07100			Dehonra Pay not taken
Dehonra 07100	30/05	Appl	Dehonra 07100			-1001 15/6/07 Drawn Pay was 1.05
Dehonra 07100	30/06	Appl	Dehonra 07100			31/06 for amounting to 47438/- (Ex. 17)
Dehonra 07100	30/07	Scale Reached	By Dist. Officer Muzaffarabad			Dehonra 15/7/07 28/7/07
						Allowed B-12 27-10-2-2 4-11-2-1 10-22/3-2
						By Dist. Officer Muzaffarabad
						S 176 15/7/69 Drawn + Allowance w.o.f. 1-2 Due to allow Continued R 2/5/7
Dehonra 07100	30/07	Appl	By Dist. Officer Muzaffarabad			8/8 15/7/07
Dehonra 07100	30/07	Scale Reached	By Dist. Officer Muzaffarabad			
Dehonra 07100	30/08	Appl	By Dist. Officer Muzaffarabad			

12

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state: (i) substantive appointment, or (ii) whether survive counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other appointment falling under the term "Pay"	Date of appointment	Signature of Government servant
Pr. G. P. S. M. J. W. A. R. D.	Spec. off.		Rs. 790/- pm	✓		07/12/2008	M. A. Khan

2007
OFFICE OF THE ACCOUNTANT GENERAL
PESHAWAR
PAY FIXED IN THE REVISED BASIS
PAY SCALES 2

2008
OFFICE OF THE ACCOUNTANT GENERAL
PESHAWAR
PAY FIXED IN THE REVISED BASIS
PAY SCALES 2

07/12/2008

07/12/2008

Rs. 808/- pm

Rs. 869/- pm

Private

07/12/2008

District Education
(Female) Abbottabad

Annex C (13)

1	2	3	4	5	6	7
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 U.S.R.	P.Y to substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment
Enrolled Clerk						
		Medical Entrols due to Fraternity Pay in B-14 was 2-3-2013 in B-15 was 2-3-2013 as the teacher was substantiated in B-15 and due Refusal of promotion her pay is hereby fixed in BPS-14.				
		BPS-14 (800-610-26300) Rs=15500				
		Pay on 1-3-2013 Rs=15930 = Next Stage				
		Pay Fixed in B-14 on 2-3-2013 Rs=16540 = Promotory Incr				
		1-12-2013 Rs=17150 (PA)				
		1-12-2014 Rs=17600 (PA)				
		1-7-2015 Rs=22980 (PA) (BPS-14)				
		1-7-2015 Rs=23655 (PA) (Next Stage)				
		1-7-2015 Rs=24560 (Promotory)				
		B-14				
		B-15				
		District Education Officer (General) Abbottabad				
		Sub Divisional Education Officer (F) Abbottabad				
		22980				

Annex D (14)

23

10	11	12	13		14	15	16
Date of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Name and grade of leave taker	Period	Government to which assigned	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
				5-6-2017	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		
				5-6-2017 (13 days)	Carried Leave		

Director (Female) Abbottabad

Sub Divisional Education Officer Abbottabad

5/2/17

Amount of Pay + Allowance due to attend D.P.S. amounting to Rs. 3300/-

Promoted as P.S.H.T. (B-15) with S.E.O (F) at S.No. 70 in the Notification No. 1261-67 A2.3.2013 take over charge as P.S.H.T. (B-15) with immediate effect at S.P.S. Kahar (Berean Circle) with S.E.O (F) title. Endst No. 4227-32 dated 31.5.2018.

Sub Divisional Education Officer Abbottabad

S.E.O (F) Abbottabad

15

(For use in Police and other similar Departments).
RECORD OF POSTINGS.

District and post	No. of District Order	Date	District and post	No. of District Order
B-93 (14280)	14	10.20.80	10.20.80	
BPS-14 (15180-1170-50280)				
G.P.S., Nallur, Kuttal Beccati	Rs. 30750	Rs. 39750	PM	7/17
	Rs. 30920	Rs. 40920	PM	12/17
PSHT (BPS-15) G.P.S., Kahod Beccati Circle	BPS-15 (16120-1330-56020)			
	Rs. 41390	PM (Next Stage)		
	Rs. 42720	PM (Promotion)		6/20/80
do		Rs. 44050	PM	01/12/81
do		Rs. 45380	PM	01/12/81
G.P.S. PSHT Tammilian		Rs. 45380	PM	14/05/81
do		Rs. 46710	PM	01/12/81
do		Rs. 48040	PM	12/20/81

Count judgement
may be produced

District Educational Officer
(Female) Abbottabad

Amer E^{ca} 16

Personnel No 4970 Name MOBEEN AKHTAR.
EE group 7 Active Temporar Pers.area DN01 Dist. Govt. KP-Provincial
EE subgroup 15 Grade 15 Cost Center AD6128 DY DO (F) PRY ABBOTT
Choose 01.01.1800 to 31.12.9999 STy.

01.12.2022	31.12.9999	P1	22	15	26	73,420.00	PKR
01.07.2022	30.11.2022	P1	22	15	25	71,440.00	PKR
01.12.2021	30.06.2022	P1	17	15	25	48,040.00	PKR
01.12.2020	30.11.2021	P1	17	15	24	46,710.00	PKR
01.12.2019	30.11.2020	P1	17	15	23	45,380.00	PKR
01.12.2018	30.11.2019	P1	17	15	22	44,050.00	PKR
01.06.2018	30.11.2018	P1	17	15	21	42,720.00	PKR
01.12.2017	31.05.2018	P1	17	14	23	40,920.00	PKR
01.07.2017	30.11.2017	P1	17	14	22	39,750.00	PKR
01.04.2017	30.06.2017	P1	16	14	22	33,300.00	PKR
01.12.2016	31.03.2017	P1	16	12	21	27,140.00	PKR
01.07.2016	30.11.2016	P1	16	12	20	26,340.00	PKR
01.02.2016	30.06.2016	P1	15	12	20	21,405.00	PKR
01.07.2015	31.01.2016	P1	15	12	19	20,755.00	PKR
01.02.2015	30.06.2015	P1	11	12	19	16,000.00	PKR
01.12.2013	31.01.2015	P1	11	12	18	15,500.00	PKR
01.08.2013	30.11.2013	P1	11	12	17	15,000.00	PKR
01.12.2012	31.07.2013	P1	11	12	17	15,000.00	PKR
01.12.2011	30.11.2012	P1	11	12	16	14,500.00	PKR
01.07.2011	30.11.2011	P1	11	12	15	14,000.00	PKR
01.12.2010	30.06.2011	P1	Y8	12	15	8,695.00	PKR
01.12.2009	30.11.2010	P1	Y8	12	14	8,385.00	PKR
01.07.2009	30.11.2009	P1	Y8	12	13	8,075.00	PKR
01.12.2008	30.06.2009	P1	Y8	7	24	7,900.00	PKR
01.07.2008	30.11.2008	P1	Y8	7	23	7,710.00	PKR
01.12.2007	30.06.2008	P1	Y7	7	23	6,460.00	PKR
01.07.2007	30.11.2007	P1	Y7	7	22	6,300.00	PKR
01.12.2006	30.06.2007	P1	Y5	7	22	5,495.00	
01.07.2006	30.11.2006	P1	Y5	7	21	5,355.00	
01.04.2006	30.06.2006	P1	Y5	7	21	5,355.00	
01.07.2005	31.03.2006	P1	Y5	7	19	5,075.00	
01.12.2004	30.06.2005	P1	Y2	7	19	4,380.00	
01.12.2003	30.11.2004	P1	Y2	7	18	4,260.00	
01.12.2002	30.11.2003	P1	Y2	7	17	4,140.00	
01.10.2002	30.11.2002	P1	Y2	7	16	4,020.00	

[Signature]
DISTRICT OFFICE
PRY ABBOTT

17

Wagetype	Detail	Month	Amount	Currency
6173	CM Flood Relief Fund01-16	01.09.2022	6,184.00	PKR
5155	Adj. Disp. Red All 2022KP	01.04.2022	7,206.00	PKR
5002	Adjustment House Rent	03.08.2021	1,175.00	PKR
5150	Adj. Teaching Allow 2021	03.08.2021	6,448.00	PKR
5150	Adj. Teaching Allow 2021	02.08.2021	3,224.00	PKR
4200	Professional Tax	01.04.2021	1,200.00	PKR
4200	Professional Tax	01.06.2020	1,200.00	PKR
4200	Professional Tax	01.04.2019	200	PKR
4200	Professional Tax	01.04.2018	200	PKR
5801	Adj Basic Pay	01.07.2017	30,620.00	PKR
5975	Adj Adhoc Relief All 2016	01.07.2017	2,446.00	PKR
4200	Professional Tax	01.04.2017	200	PKR
5002	Adjustment House Rent	01.05.2016	6,530.00	PKR
5011	Adj Conveyance Allowance	01.05.2016	8,568.00	PKR
5012	Adjustment Medical All	01.05.2016	7,500.00	PKR
5309	Adj. 15% Adhoc Allowance	01.05.2016	12,000.00	PKR
5801	Adj Basic Pay	01.05.2016	105,075.00	PKR
5898	Adj. Adhoc Allowance 50%	01.05.2016	20,960.00	PKR
5950	Adj:Adhoc Relief All-2014	01.05.2016	8,000.00	PKR
5964	Adj Adhoc Relief All 2015	01.05.2016	10,515.00	PKR
6001	Adj Benevolent Fund	01.05.2016	900.00	PKR
6006	Adj Group Insurance	01.05.2016	575.00	PKR
6075	Adj GPF	01.05.2016	7,520.00	PKR
6145	Adj Addl Group Insurance	01.05.2016	65.00	PKR
6164	Adj E.E.F NWFP Fund	01.05.2016	500.00	PKR
4200	Professional Tax	01.04.2016	100	PKR
5002	Adjustment House Rent	01.08.2015	11,080.00	PKR
5011	Adj Conveyance Allowance	01.08.2015	23,822.00	PKR
5012	Adjustment Medical All	01.08.2015	9,581.00	PKR
5309	Adj. 15% Adhoc Allowance	01.08.2015	19,725.00	PKR
5801	Adj Basic Pay	01.08.2015	131,500.00	PKR
5898	Adj. Adhoc Allowance 50%	01.08.2015	36,879.00	PKR
5911	Adj. Adhoc Relief 2011	01.08.2015	11,063.00	PKR
5938	Adj:Adhoc Relief All 2012	01.08.2015	26,300.00	PKR
5950	Adj:Adhoc Relief All-2014	01.08.2015	8,500.00	PKR
6001	Adj Benevolent Fund	01.08.2015	1,440.00	PKR
6006	Adj Group Insurance	01.08.2015	104	PKR
6075	Adj GPF	01.08.2015	9,280.00	PKR
6145	Adj Addl Group Insurance	01.08.2015	920	PKR
6164	Adj E.E.F NWFP Fund	01.08.2015	900	PKR
4200	Professional Tax	01.04.2015	100	PKR
5002	Adjustment House Rent	01.02.2015	1,980.00	PKR
5011	Adj Conveyance Allowance	01.02.2015	1,471.00	PKR
5012	Adjustment Medical All	01.02.2015	1,819.00	PKR
5309	Adj. 15% Adhoc Allowance	01.02.2015	3,639.00	PKR
5801	Adj Basic Pay	01.02.2015	24,533.00	PKR
5898	Adj. Adhoc Allowance 50%	01.02.2015	6,591.00	PKR
5911	Adj. Adhoc Relief 2011	01.02.2015	1,977.00	PKR
5938	Adj:Adhoc Relief All 2012	01.02.2015	4,851.00	PKR
5950	Adj:Adhoc Relief All-2014	01.02.2015	2,426.00	PKR
6006	Adj Group Insurance	01.02.2015	230.00	PKR
6075	Adj GPF	01.02.2015	2,320.00	PKR
6145	Adj Addl Group Insurance	01.02.2015	26.00	PKR
6164	Adj E.E.F NWFP Fund	01.02.2015	200.00	PKR
6211	CM KP Fund IDP,S-NW-2014	01.07.2014	500.65	PKR
5011	Adj Conveyance Allowance	01.01.2013	2,880.00	PKR
5011	Adj Conveyance Allowance	01.09.2012	300	PKR
5002	Adjustment House Rent	31.07.2009	4,827.00	PKR
5801	Adj Basic Pay	31.07.2009	4,370.00	PKR
6157	Chief Minister Fund NWFP	01.05.2009	255	PKR
4200	Professional Tax	01.04.2009	100	PKR
4200	Professional Tax	01.04.2008	100	PKR

[Signature]
 District Education Officer
 (Female) Abbottabad

a 2
Arnold F. 18

1	2	3	4	5	6	7			
Name of post	Whether substitute or officiating and whether permanent or temporary	If officiating, state (i) appointment, or (ii) whether acting as for position under A.P. 311 C.R.R.	Pay is substitute pay	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of appointment	Signature		
2803, N. K. Kumbhar Bhosale	Pay in Previous Grade on 1-12-1998 - 2533/- PM. Pay Fixed in B-10 on 1-12-1998 - Rs-2623/- PM. 1-12-99 Rs-2730/- PM 1-12-2000 Rs-2837/- A/D 1-12-2001 - 2944/- A/D 1-12-2001 - 3051/- A/D RPS-10 (1660-107-3265) 1-12-2001 - 4570 1-12-2002 - 4730/- A/D 1-12-2003 - 4890/- A/D 1-12-2004 - 5050 1-7-2005 - 5825/- A/D 1-12-2005 - 6010/- A/D 1-12-2006 - 6195/- A/D RPS-10 (3865-485-84 3295-515-9745 1-12-07 - 7165 1-12-07 - 7380/- A/D 1-12-07 - 7530/- Next Stage 7790/- PM B-12 (3630-260-11430) 1-7-2008 - 9315/- A/D 1-12-08 - 9625/- A/D 1-12-09 - 9935/- A/D 1-12-10 - 10245/- A/D B-12 (700-500-22430) 1-7-2011 - 16500 1-12-2011 - 17600/- A/D 1-12-2012 - 17500/- A/D 1-12-2013 - 17760/- Next Stage 18370/- Promotuse B-14 (000-610-26300) 1-1-2013 - 18980/- A/D 1-7-2014 - 19590/- A/D 1-7-2015 - 25350 1-12-2015 - 26140/- A/D B-14 (12720-980-42120) 1-7-2016 - 32220 1-12-2016 - 33300/- A/D								
								M. Labani	
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani
									M. Labani

S/Board
Page-6

Sub Divisional Education
Officer (F) Abbottabad

District Education
Officer Abbottabad

u n
Amir G 19



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

CS CamScanner

D DATE
Dated Peshawar the 30th May, 2014

NOTIFICATION:-

No.FD.S.O.(PRC)1-2/77 In exercise of the powers conferred by section 26, of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No.XVII) of 1973, the Chief Minister of the Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Services Pay Revision Rules, 1978, the following amendment shall be made, namely:-

AMENDMENT

After rule 9, the following new rule shall be inserted, namely

"9A. A post of a Civil Servant which is upgraded from 28th January, 2002 or a post to be upgraded after commencement of this rule, the Incumbent of such post, on commencement of this rule, shall be allowed one premature increment on such upgradation

Provided that the pay of a Civil Servant, whose post is upgraded from 28th January, 2002 shall be fixed in accordance with the new increment and he shall not be entitled to any arrears in this behalf.

SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Encls: No. & Date Even

Copy is forwarded for information & necessary action to the:-

1. PS to Addl. Chief Secretary, FATA
2. All Administrative Secretaries, Government of Khyber Pakhtunkhwa
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa
4. All Commissioners in Khyber Pakhtunkhwa.
5. Accountant General, Khyber Pakhtunkhwa.
6. Secretary to Government, Khyber Pakhtunkhwa
7. Provincial Secretary to Chief Minister, Khyber Pakhtunkhwa
8. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
9. All Heads of Attached Departments in Khyber Pakhtunkhwa.
10. Registrar, Peshawar High Court, Peshawar.
11. All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.
12. Registrar, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
13. Registrar, Service Tribunal, Khyber Pakhtunkhwa.
14. All the Autonomous and Semi Autonomous Bodies in Khyber Pakhtunkhwa.
15. Secretary to Government of Punjab, Sindh & Balochistan, Peshawar, Lahore, Karachi & Quetta
16. The District Controller of Accounts, Peshawar, Udder Kot, Bahawalpur, Swat & Dir Lower
17. The Senior District Accounts Officer, Nowshera, Swabi, Chitral, Haveli, Ucheshahi & Dir Lower
18. The Treasury Officer, Peshawar
19. All District / Agency Accounts Officers in Khyber Pakhtunkhwa / FATA
20. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa
21. PSO to Chief Secretary, Khyber Pakhtunkhwa
22. Director, Local Fund Audit, Khyber Pakhtunkhwa Peshawar
23. PS to Finance Secretary
24. PS to All Addl. Secretaries / Deputy Secretaries in Finance Department
25. Director, FMU with the request to update the same Notification on website
26. All Section Officers / Budget Officers in Finance Department

AFFECTED

(WAZIR MUHAMMAD AFGAR)
Section Officer (SR-1)

OPTION

I do hereby opt for Re-fixation of my pay in BPS-10 w.e.f 1-12-1999 instead of 1-7-1998 after availing of Annual Increment in BPS-7 w.e.f 1-12-1999 under the provision of Govt Servants Pay Fixation/Pay Revision Rules - 1978 under 10(3) Rule of 1978.

[Signature]
[Signature] (Mubeen Akhtar)

Sub Divisional Education Officer (F) Abbottabad

[Signature] PST

Consequent upon the Judgment of The Honourable Peshawar High Court Bench, Abbottabad, contained in writ Petition No-541-A/2016, Mst. Mubeen Akhtar, PST awarded 3/grade BPS-10 w.e.f 1-7-1999 vide O.O (F) Abbottabad Extra No-1613-46 A/2-3-2017. Condition No-3.

Dated: 18-10-2016.

The order to this effect should be shown w.e.f 18-10-2016, the date of passing the Judgment of the Honourable Peshawar High Court.

[Signature]
[Signature] (B. Khatun)

Sub Divisional Education Officer (F) Abbottabad

399
21/11/17

[Signature]

21 Amme I

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) ABBOTTABAD



No. 1122-26 / Lit
Dated: 18.09.2023

To

The All Principals, Headmistress, Dy DEO (F),
SIDEO (F) Abbottabad, Lower Tanawal, Lora, Havclian
District Abbottabad.

Subject: CP NO 84/ 377-P/20 & 307, 469, 474 TO 549-P/21 GOVT OF KHYBER PAKHTUNKHWA VS MAQAD HAYAT AND OTHERS (CONVEYANCE ALLOWANCE).

Reference to Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar letter No. SO (Lit-II) E&SED/1-5/Miscellaneous/2023 dated Peshawar 02-01-2023 it is directed by Worthy Secretary regarding payment of conveyance allowance during summer and winter vacations to implement the judgment of the Honourable Supreme Court of Pakistan in CPLA No. 469-P/2021 Titled Government of Khyber Pakhtunkhwa & Others VS Jalal-ud-Din in its letter and spirit to avoid any adverse order against the department as already due to gross negligence on the part of department salaries have been attached.

Therefore, you are once again directed to implement the judgment of the August Supreme Court of Pakistan in letter and spirit so as to avoid any adverse order from Honourable Court under intimation to this department.

Being court matter, this is to be treated as Most Urgent.

- sd -
District Education Officer (F)
Abbottabad

Encl: No. & Date Even

Copy for information forwarded to the:-

1. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. District Accounts Officer, Abbottabad.
3. PS to Secretary, E&SED Khyber Pakhtunkhwa, Peshawar.
4. PA to Director, E&SE Khyber Pakhtunkhwa, Peshawar.

✓
District Education Officer (F)
Abbottabad

22

OFFICE THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 1127 Dated: 08-10-2022
Phone No. 0992-342533-342324

To

1. The All Principals, Headmistress.
2. Dy DEO (f), Local Office.
3. SDEO (f) Abbottabad, lower Tanawal, Jora and Havelian, District Abbottabad.

Subject: EXECUTION PETITION NO 447/2022 IN SERVICE APPEAL NO 12889/2022 (IMPLEMENTATION BEFORE THE FIXED DATE i.e 17-11-2022).

Memo;

It is brought to your kind notice that execution petition No 447/2022 titled "Mst. syeda Nafeesa khanum (retired) PST and 187 others VS Govt of KPK" was decided in favour of the appellants in the subject appeal on 12-07-2021. In the judgment, the competent authority directed to all the DDOs for compliance/implementation and submission of compliance report before the honorable court well in time.

You are therefore, requested to comply the above judgment/decision and payment of conveyance allowance may be made to all the appellants of the subject appeal provisionally obtaining and undertaking to the effect that the payment shall be recovered subject to the outcome of apex court in CPLA No. 469-P/2021 and provide a complete file to this office within 10 days for submission before the court falling with the DDOs shall be responsible for the consequences.

This may be treated as top priority.

sd-
District Education officer (F)
Abbottabad.

Endst No. _____ Dated: 18/10/2022

Copy for information forwarded to the,

- 1 Registrar, KPK service Tribunal Peshawar.
- 2 District Account officer Abbottabad.
- 3 SO (Litigation) E&SED KPK Peshawar.
- 4 AD (Litigation) Director E&SED KPK Peshawar

sd-
District Education officer (F)
Abbottabad.

23

**DIRECTORATE OF ELEMENTARY SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

No. 5602-62 (AD Lit-II)

Dated Peshawar the 06/01/2023

The all the District Education Offices,
(Male/Female) in Khyber Pakhtunkhwa.

Subject: **IMPLEMENTATION OF THE JUDGMENTS DATED 11-11-2019, 13-02-2020, 16-03-2021 & 12-07-2021 OF THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR, UPHELD BY THE AUGUST SUPREME COURT OF PAKISTAN VIDE JUDGMENT DATED 07-07-2022 (CONVEYANCE ALLOWANCE).**

Memo:

I am directed to refer to the letter No. S.O(E&SED)/1-5/Miscellaneous/2023 dated 02-1-2023 of the Section Officer (Lit-II) E&SE Department Khyber Pakhtunkhwa Peshawar, regarding the grant of conveyance allowance to teachers & to state that the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar has passed judgments dated 11-11-2019, 13-02-2019 and 16-03-2021 in Service Appeals No. 1452/2019, 248/2020, 1260/2016 & the common judgement dated 12-07-2021 in Service Appeals No. 12889/2020, 1207/2017, 812 to 818/2021, 903 to 914/2021, 3536 to 3551/2021, 775 to 795/2021 & 779 to 811/2021, duly upheld by august Supreme Court of Pakistan vide Judgment dated 07-7-2022 under case titled Government of KP Vs Masqat Hayat & others.

In this regard, the teachers from different Districts have filed Execution Petitions before the Honorable Service Tribunal for the implementation of the cited judgments with regard to reimbursement of already deducted amount/conveyance allowance during summer & winter vacation from their salaries.

During Court proceedings, the Honorable Khyber Pakhtunkhwa Service Tribunal has shown severe displeasure upon non-implementation of the aforementioned judgments and resultantlly, the salaries of the Worthy Secretary & Director E&SED Khyber Pakhtunkhwa have been attached in multiple Execution Petitions on account of non-compliance of the judgment under reference.

Therefore, to avoid legal complications, it is hereby directed that formal circular/Notification of to the effect of grant of conveyance allowance & reimbursement of all deducted amount may kindly be issued in view of the judgment dated 07-07-2022 of the august Supreme Court of Pakistan on priority basis being a Court matter under intimation to this Directorate please.

*EO (Lit II)
for n/a p12
7/8
Date 21/11/2023*

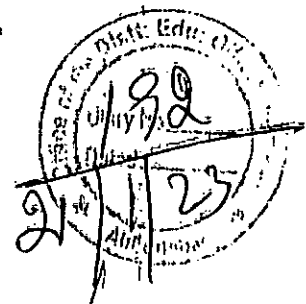
[Signature]
ASSISTANT DIRECTOR (LIT-II)

Endst No: _____/File No.AD(Lit-II)/Maqsad Hayat/General Letter/2023

Dated Peshawar the: ___/___/2023.

Copy forwarded for information to the:-

1. Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. Additional Secretary (G) E&SE Department Khyber Pakhtunkhwa
3. Additional Director (Estab-M) E&SE Khyber Pakhtunkhwa.
4. Additional Director (Estab) Merged Areas Khyber Pakhtunkhwa.
5. Deputy Director (Legal) E&SE Khyber Pakhtunkhwa
6. Section Officer (Lit-II) E&SE Department Khyber Pakhtunkhwa.
7. PA to Director (E&SE) Khyber Pakhtunkhwa Peshawar.
8. Master file.



GOVERNMENT OF KERALA
 FINANCE DEPARTMENT
 (REVENUE SECTION)



24

1964 P.O. No. 16/1964

SECRET

Reference is made to the Government Order No. 1000/1964 dated 27.12.64 in which it was decided that the Government should contribute towards the expenditure of the employees of the Government of Kerala during the period of their absence during the absence of a member of the family of the employee and the amount of the contribution should be paid on monthly basis.

Secretaries to Government of Kerala, Palakkad, Thrissur, Kottayam, Malappuram, Kozhikode, Kannur, Idissa, Wayanad, Ponnani, Kollam, Alappuzha, Kanyakumari, Thiruvananthapuram, and other Government Departments.

Local No. 8/1964

For the Secretary to Government of Kerala, Palakkad.

1. Accounts Officer, Palakkad District.
2. Secretaries to Government of Kerala, Palakkad, Thrissur, Kottayam, Malappuram, Kozhikode, Kannur, Idissa, Wayanad, Ponnani, Kollam, Alappuzha, Kanyakumari, Thiruvananthapuram, and other Government Departments.
3. Director, Public Works Department, Palakkad.
4. Director, Public Works Department, Thrissur.
5. Director, Public Works Department, Kottayam.
6. Director, Public Works Department, Malappuram.
7. Director, Public Works Department, Kozhikode.
8. Director, Public Works Department, Kannur.
9. Director, Public Works Department, Idissa.
10. Director, Public Works Department, Wayanad.
11. Director, Public Works Department, Ponnani.
12. Director, Public Works Department, Kollam.
13. Director, Public Works Department, Alappuzha.
14. Director, Public Works Department, Kanyakumari.
15. Director, Public Works Department, Thiruvananthapuram.

SECRET

[Handwritten signature]

1. Accounts Officer, Palakkad District.
2. Secretaries to Government of Kerala, Palakkad, Thrissur, Kottayam, Malappuram, Kozhikode, Kannur, Idissa, Wayanad, Ponnani, Kollam, Alappuzha, Kanyakumari, Thiruvananthapuram, and other Government Departments.
3. Director, Public Works Department, Palakkad.
4. Director, Public Works Department, Thrissur.
5. Director, Public Works Department, Kottayam.
6. Director, Public Works Department, Malappuram.
7. Director, Public Works Department, Kozhikode.
8. Director, Public Works Department, Kannur.
9. Director, Public Works Department, Idissa.
10. Director, Public Works Department, Wayanad.
11. Director, Public Works Department, Ponnani.
12. Director, Public Works Department, Kollam.
13. Director, Public Works Department, Alappuzha.
14. Director, Public Works Department, Kanyakumari.
15. Director, Public Works Department, Thiruvananthapuram.

To: Mr. P. M. ...

1. Accounts Officer, Palakkad District.

2. Secretaries to Government of Kerala, Palakkad, Thrissur, Kottayam, Malappuram, Kozhikode, Kannur, Idissa, Wayanad, Ponnani, Kollam, Alappuzha, Kanyakumari, Thiruvananthapuram, and other Government Departments.

3. Director, Public Works Department, Palakkad.

4. Director, Public Works Department, Thrissur.

5. Director, Public Works Department, Kottayam.

6. Director, Public Works Department, Malappuram.

7. Director, Public Works Department, Kozhikode.

8. Director, Public Works Department, Kannur.

9. Director, Public Works Department, Idissa.

10. Director, Public Works Department, Wayanad.

11. Director, Public Works Department, Ponnani.

12. Director, Public Works Department, Kollam.

13. Director, Public Works Department, Alappuzha.

14. Director, Public Works Department, Kanyakumari.

15. Director, Public Works Department, Thiruvananthapuram.

25 ✓



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

Dated Peshawar the 16th February, 2021

NOTIFICATION

No. SO(SR-IVVFD/1-2/Constance Allowance/2023; In continuation to this office notification of even number dated 25/01/2023, it is further clarified that the arrears of Consequence Allowance to the employees of Education Department accumulated due to stoppage of said allowance during (summer & winter) vacation shall be paid on monthly basis, instead of one time (lump sum) payment of arrears, in the corresponding months equal to the months of deduction.

Secretary to Government of Khyber Pakhtunkhwa
Finance Department

Endst No. & Date Esent:

Copy is forwarded for information & necessary action to the

1. Accountant General, Khyber Pakhtunkhwa.
2. Secretaries to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education and Higher Education Departments
3. Director FMU, Finance Department with the request to upload the same on Finance Department's official website.
4. Director, Staff Training Institute (STI), E&A Department.
5. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. PSO to Chief Secretary, Khyber Pakhtunkhwa
7. All Deputy Commissioners, Khyber Pakhtunkhwa.
8. Registrar Peshawar Services Tribunal, Khyber Pakhtunkhwa, Peshawar.
9. All Comptroller/ District Accounts Officers, Khyber Pakhtunkhwa.
10. All District Education Officers (Male & Female) Khyber Pakhtunkhwa and Merged Areas
11. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department
12. PS to Special Secretary (A&R), Finance Department.
13. PS to Special Secretary (Budget), Finance Department.
14. PA to Additional Secretary (Regulation), Finance Department.
15. PA to Deputy Secretary (Regulation-I), Finance Department (YAR SILHANIMAB
16. Master File.

Section Officer (SR-IV)



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No 5755 Dated 25 /2023
Phone No. 0992-342533-342324

7

AUTHORITY LETTER

**MR HUJJAJ SHAH
MRS LALA RUKH**

Legal representatives of under signed is hereby authorised to attend the following case title MUBEEN AKHTAR, SERVICE APPEAL NO 98/2023, IN HONORABLE KPK SERVICE TRIBUNAL CAMP COURT ABBOTTABAD on behalf of District Education Officer(Female) Abbottabad. *4 respondent nos 1, 2, 3*

*M. de
for*
District Education Officer (F)
Abbottabad