


FORM OF ORDER SHEET

Court of _____

Implementation Petition No. 740/2023

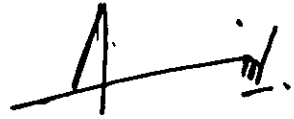
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	10.10.2023	<p>The implementation petition of Mst. Tasleem Kaousar and two others received today by registered post through Abdur Rauf Chohan Advocate. It is fixed for implementation report before Single Bench at A.Abad on _____ . Original file be requisitioned. AAG has noted the next date.</p> <p>By the order of Chairman  REGISTRAR</p>

1. The appeal/execution petition of M. N. Farooq, Faisalabad, received today by registered post (i.e. 24.7.2023) is returned to the learned counsel for the appellant, which is returned to the court for the appellant's resubmission within 15 days.

- 4B
1. Appendix A of the petition is incomplete.
 2. Page No. 15 of the petition is illegible.
 3. Wakalat nama in favour of petitioners is not attached.
 4. Two more copies/sets of the petition along with the objections in all respect may also be submitted with the petition.

No. 3032/S.T.

DL 25/7/2023.



Ch. Abdur Rouf Chohan Adv.
High Court A. Abad.

EP کے اعتراضات دور دیے ہیں
مذکورہ کارروائی کے حوالے سے فریٹ

T.D. : 21/9/2023

The objection no. 1 of this office is still standing. Hence, the appeal/execution petition is returned again to learned counsel for the appellant, to re-submit the same within seven days.

3274
22/9/23

مذکورہ اعتراضات دور دیے ہیں
T.D. : 21/9/23
Assistant Registrar
22/09/23

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Execution Petition NO. 740 / 2023.

IN

Service Appeal No. 1276 / 2007

Tasleem Kousar SDEO & others

.... PETITIONERS

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department Peshawar & others

.... RESPONDENTS

EXECUTION PETITION

INDEX

S.No.	Description of Document	Annexure	Page No.
1.	Execution Petition alongwith affidavit		1-6
2.	Copy of judgment of Supreme Court of Pakistan dated 19/07/2007	"A"	7-9
3.	Copy of Supreme Court order dated 29.01.2008 passed in CRP No. 216 on 217	"B"	10-11
4.	Copy of relevant pages of judgment	"C"	12-15
5.	Copy of relevant page of service book	"D"	16-30
6.	Vakalat Nama		31


... PETITIONERS

Through Counsel:



CHODARY ABDUR RAUF CHOCHAN
Advocate High Court

Dated: 13/07/2023

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Execution Petition NO. 740 / 2023.

IN

Service Appeal No. 1276 / 2007

1. Tasleem Kousar SDEO Female Tehsil Havelian District Abbottabad.
Contact No. 0313-5351944 Email address tasleemkousar78@gmail.com
2. Naeem Akhtar SST Govt Girls Middle School Koliata Tehsil Lower
Tanawal District Abbottabad.
3. Nazneen PST Govt Girls Primary School Chata Maira Tehsil and
District Abbottabad.

.... PETITIONERS

V E R S U S

- 1) Government of Khyber Pakhtunkhwa through Secretary (Elementary
& Secondary Education), Department Peshawar.
- 2) Accountant General Khyber Pakhtunkhwa Peshawar.
- 3) District Comptroller of Accounts, Abbottabad.
- 4) District Education Officer (Female) E&SE District Abbottabad.

.... RESPONDENTS

EXECUTION PETITION

EXECUTION PETITION FOR IMPLEMENTATION
FOR FINAL JUDGMENT DATED 12/05/2009
PASSED IN APPEAL NO.1276 OF 2007 BY THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR (COMP COURT ABBOTTABAD)

PRAYER:-

IT IS RESPECTFULLY PRAYED THAT RESPONDENTS MAY PLEASE BE DIRECTED TO RESTORE THE 04 ADVANCE INCREMENTS OF MA INSTEAD OF 02 AND ADVANCE INCREMENT /RECOVERY OF PAYMENT (ROP) WHICH ALREADY DEDUCTED / RECOVERED PREVIOUSLY MAY BE REIMBURSED TO PETITIONER WITH ALL BACK BENEFITS.

ANY OTHER RELIEF FOR WHICH THE PETITIONER IS ENTITLED AND SAME IS NOT ASKED /PRAYED SPECIFICALLY MAY KINDLY BE GRANTED IN THE FAVOUR OF THE PETITIONER TOO.

Respectfully Sheweth:

- i. That the provincial Government of NWFP Now Khyber Pakhtunkhwa and the notification dated 11.08.1991 of Finance Department gives rights of advance increments as its para #5, class c casters for the grant of four advance increments on attaining M.A Degree and in the meanwhile, august supreme court of Pakistan has decided the same

matters in CPLA No.525 and 256 of 2007 and ultimately that the teachers in education department are also entitled for their advance increment given in notification No.FD(PRC)1-1/89 dated 11.08.1991 without any exception.

(Copy of judgment of Supreme Court of Pakistan dated 19/07/2007 is annexed as annexure "A")

- ii. That august Supreme Court of Pakistan has been pleased to dismiss the Civil Review Petition No.216 & 217 on 29.01.2008 filed by government of NWFP Finance Department Peshawar which were filed against the judgment dated 19.07.2007 passed in CPLA No. 525 and 526 of 2007 and now the matter of advanced increment has attained its finality and there is no way before the respondents to withhold / deny the rights of the Petitioner.

(Copy of Supreme Court order dated 29.01.2008 passed in CRP No. 216 on 217 is annexed as annexure "B")

- iii. That in the light of judgment dated 19.07.2007 passed by August Supreme Court of Pakistan the Khyber Pakhtunkhwa Service Tribunal had been pleased to accept the service appeal No. 1276 of 2007 & numerous same nature other appeals and

passed a "judgment in rem" on 12.05.2009, for grant of 04 advance increments of MA, whereupon respondents did not file petition (CPLA) Before Apex Court against the judgment dated 12.05.2009 and thus it attained finality.

(Copy of relevant pages of judgment are annexed as annexure "C")

- iv. That letter respondents implemented the above judgment in letter and spirit and the benefits of advance increments were being given to the petitioner regularly as a part and parcel of his salary, while in the year 2012 respondent No.1, without any notice or any legal reason, deducted 02 advance increments out of 04 advance increments of MA from petitioners salary.

(Copy of relevant page of service book is annexed as annexure "D")

- v. That above illegal and unlawful deduction of advance increments by the respondents after implementation of final judgment was challenged up to the Supreme Court of Pakistan Islamabad and now the very law point of final judgment is decided by Apex Court on 28.11.2019.

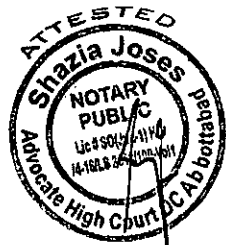
- vi. That after deciding the point of law by the Supreme Court implementation of the final judgment of this Hon'ble Tribunal dated 12.05.2009, once again will be implemented by this Hon'ble Tribunal and for the same reason instant implantation petition is being filed which is within time under the law.

PRAYER:

It is respectfully prayed that respondents may please be directed to restore the 04 advance increments of MA instead of 02 and advance increments / recovery of payment which already deducted / recovered previously may be returned to petitioner with all back benefit.

Any other relief for which the petitioner is entitled and same is not asked/prayed specifically may kindly be granted in the favour of the petitioner too.

....PETITIONERS



12/7/2023

Tasleem Kousar

Naeem Akhtar

Nazneen

Through:

CHoudary ABDUR RAUF CHOhan

Advocate High Court Abbottabad.

Contact No. 0347-3146975

Dated: 13 /07 /2023

**BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Execution Petition NO. 2023.

IN

Service Appeal No. 1276 / 2007

Tasleem Kousar SDEO & others

.... PETITIONERS

V E R S U S

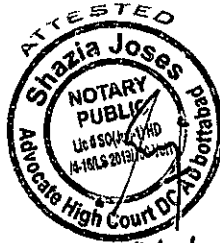
Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department Peshawar & others

.... RESPONDENTS

**EXECUTION PETITION
AFFIDAVIT**

I, **1. Tasleem Kousar SDEO Female Tehsil Havelian District Abbottabad. Petitioner**, do hereby affirm on oath that contents of instant execution petition (for restoration of advance increments of MA along with reimbursement of recovered amount) is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal and it is also declared on oath that respondents did not restore the deducted advance increments yet and instant execution / implementation petition is first petition & same nature of any other petition is not pending before this Honourable Tribunal.

Dated:- 13/7/2023




(TASLEEM KOUSAR)

**DEPONENT / PETITIONER
CNIC NO. 13101-0910657-4**

6-1504-1593/01

(7)

to

Annexure (1)

ANNEXURE
A

In the Supreme Court of Pakistan
(Appellate Jurisdiction)

Present:

Mr. Justice Rana Bhagwandas, ACJ
Mr. Justice Sardar Muhammad Raza Khan

C.P.L.A No.525 of 2007

(On appeal from judgment of NWFP Service Tribunal, Peshawar dated 24.4.2007 passed in Service Appeal No.498 of 2006)

Rashid Iqbal Khan

Petitioner

Versus

District Coordination Officer, Abbottabad & others

Respondents

Petitioner:

Rashid Iqbal Khan, in person

For the respondents:

Sardar Shaukat Hayat Khan,
Additional Advocate General, NWFP

C.P.L.A No.526 of 2007

(On appeal from judgment of NWFP Service Tribunal, Peshawar dated 24.4.2007 passed in Service Appeal No.499 of 2006)

Muhammad Haroon Qureshi

Petitioner

Versus

District Coordination Officer, Abbottabad & others

Respondents

Petitioner:

Muhammad Haroon Qureshi, in person

For the respondents:

Sardar Shaukat Hayat Khan,
Additional Advocate General, NWFP

Date of hearing:

19.7.2007

Judgment

Rana Bhagwandas, ACJ – Sole grievance of the petitioners

ATTESTED

before the NWFP Service Tribunal (hereinafter referred to as the Tribunal)

appears to be that after induction in BPS-14 as Elementary School Teachers,

in terms of NWFP Government Circular dated 7.8.1991 they are entitled to

four advance increments in terms of NWFP Government circular letter

No.FD(PRC)1-1/89 dated 11.8.1991 on acquiring higher qualification

MA/MSc. They have been non-suited by the Tribunal vide judgment dated

Superintendent
Preme Court of Pakistan
ISLAMABAD

ATTESTED

C.P.L.A Nos.525 & 526 of 2007

24.4.2007 on the premise that they had been placed in higher grade i.e. BPS-14 on acquiring BA/BSc Second Division in terms of Finance Division circular letter No.FD(PRC)1-1/89 dated 7.8.1991, therefore, the provisions of circular letter dated 11.8.1991 issued by the Finance Department would not be applicable to teachers. Tribunal has expressed the view that this circular would be applicable only to ministerial staff, as such, the petitioners were not entitled to the relief claimed by them. Petitioners being aggrieved seek leave to appeal.

2. We have heard the petitioners, who argued their case in person whereas learned Additional Advocate General, NWFP has appeared on Court notice issued to the respondents. With the assistance of learned Additional Advocate General, we have examined both the circulars, which do not exclude the teachers in the Education Department from the benefits accruing out of circular letter dated 11.8.1991, as on its plain reading it applies to all civil servants in BPS 1 to 15 serving under the Provincial Government. Para 5 of the said circular provides mechanism for grant of advance increments to officials for possessing/attaining higher educational qualification. Para 5, clause (c) caters for the grant of four advance increments on attaining MA/MSc where prescribed qualification is FA/FSc. It would be seen that the petitioners were placed in BS-14 by reason of having acquired the qualification of BA/BSc, Second Division which is the prescribed qualification for the post of Elementary School Teacher. It is not the case of respondent-Government that the petitioners have already drawn advance increments on acquiring higher qualification of MA/MSc.

3. Learned Additional Advocate General attempted to argue that in view of the higher scale granted to Elementary School Teachers in pursuance of the circular letter dated 7.8.1991, which was personal to them, the

Justice Javed Ali
Attested

ATTESTED

Superintendent
Sine Court of Pakistan
ISLAMABAD

[Signature]
[Signature]
ATTESTED

90

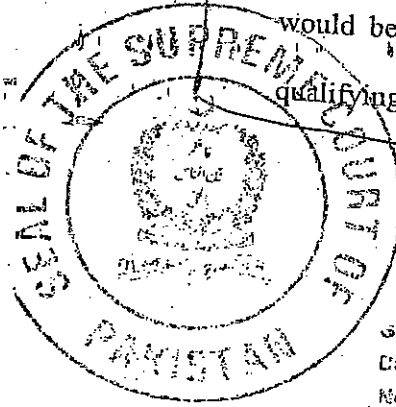
3

C.P.L.A Nos. 525 & 526 of 2007

petitioners would not be entitled to the incentive of advance increments contemplated by circular letter dated 11.8.1991 but he is unable to cite any principle of law or authority for placing this interpretation. We find that, while circular letter dated 7.8.1991 exclusively deals with the scales of pay of school teachers in different categories, circular letter dated 11.8.1991 provides for the revision of basic pay scales and grant of annual increments and advance increments for all Provincial civil servants in NWFP without any exception. Since the teachers or the employees in Education Department have never been expressly or impliedly excluded from the operation of the circular letter, view taken by the Tribunal being erroneous cannot be sustained at law. In fact, it suffers from clear misconception of law and misconstruction of the circular letter (supra).

Justice Husain
Attested

3. For the aforesaid facts, circumstances and reasons, we are of the considered view that the Tribunal committed a serious error of law, therefore, the impugned judgment is liable to be set aside. Consequently, we convert these petitions into appeals and, on acceptance, declare that the petitioners would be entitled to four advance increments with effect from the date of qualifying MA/MSc exam. ✓



Justice Ijaz Ahmad, CJ
Justice Ghafoor Abbas Khan, J

Sd/- 4733/07
 Date of Presentation: 19.7.07
 No. of Petitions: 9
 No. of Petitioners: 9
 Islamabad, 19th July, 2007
 Not approved for reporting: 10.8.07
 Date of Copying: 15.8.2007
 Date of Filing: 15.8.07

Certified to be true copy
[Signature]
Superintendent
Supreme Court of Pakistan
ISLAMABAD

[Signature]
ATTESTED

ANNEXURE

~~A~~ B

Annex - "E"

IN THE SUPREME COURT OF PAKISTAN
(REVIEW/ORIGINAL JURISDICTION)

Present:
MR. JUSTICE MUHAMMAD NAWAZ ABBASI
MR. JUSTICE MUHAMMAD QAIM JAN JATAN
MR. JUSTICE MOHAMMAD MQOSA K. LEGHARI

C.R.P. NOS. 216 & 217/2007 in C.P. NOS. 525 & 526/2007
(On review from the judgment dated 19.7.2007 passed in C.A. Nos. 1504 & 1505/2007)

Secretary to Govt. of N.W.F.P. Finance Department, Peshawar
... Petitioner (in both cases)

Versus

Rashid Iqbal Khan and others ... Respondents (in C.R.P. No. 216/07)
Muhammad Haroon Qureshi and others ... Respondents (in C.R.P. No. 217/07)

C.R.O.P. NOS. 66 & 67/2007 IN C.A. NOS. 1504 & 1505/2007

Rashid Iqbal Khan ... Petitioner (in C.R.O.P. No. 66/07)
Muhammad Haroon Qureshi ... Petitioner (in C.R.O.P. No. 67/07)

Versus

District Coordination Officer, Abbottabad and others
... Respondents (in both cases)

For the Petitioner (in C.R.P. Nos. 216 & 217/07) ... Sardar Shaukat Hayat, Addl.A.G. N.W.F.P

For the Petitioners (in C.R.O.P. 66 & 67/07) ... In Person

For the Respondents (in C.R.P. Nos. 216 & 217/07) ... N.R.

For the Respondents (in C.R.O.P. 66 & 67/07) ... Sardar Shaukat Hayat, Addl.A.G. N.W.F.P

Date of hearing ... 29.1.2008

ORDER

MUHAMMAD NAWAZ ABBASI, J:- The learned Addl. Advocate General has contended that this Court while interpreting the circulars in question has taken a view contrary to the correct legal position according to which private respondents were not entitled to the benefit of advance increments. We are afraid, the learned Addl.A.G. instead of pointing out any mistake of law and fact in the judgment made an attempt to re-open the case on merits. The scope of

[Handwritten signature]

Attested by [Signature]

ATTESTED

[Large handwritten signature]
ATTESTED

3

(1)

(11)

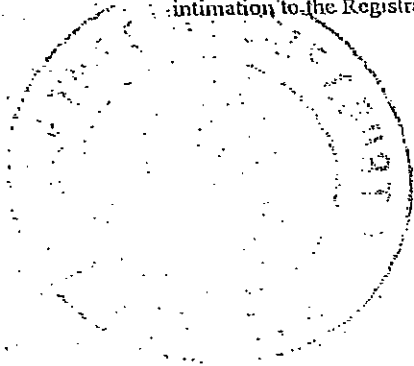
4

(X)

review is very limited and the points already considered in the judgment under review cannot be allowed to be re-agitated in review jurisdiction. These review petitions being without any substance are accordingly dismissed.

Cr.I.O.P. Nos. 66 & 67/2007

The learned Addl.A.G. has given an undertaking for implementation of the judgment of this Court within a period of two weeks and in view thereof, this criminal original is disposed of with the direction that the judgment should be implemented in letter and spirit within two weeks under intimation to the Registrar of this Court.



*Prof. Muhammad Nawaz Akhbari, J.
Prof. Muhammad Qasim Javed, J.
Prof. Muhammad Masood Leghari, J.*
13/02/08

Islamabad
29.1.2008
(Ejaz Goraya)

17/1/08

*Attested
Mujib*

562/08

28-1-08

500
3-21
2-21

13-02-2008
25-02-2008

Reshma Jaffer

ATTESTED

[Signature]
ATTESTED

BEFORE THE NWFP SERVICE TRIBUNAL, CAMP COURT ABBOTTABAD.

Appeal No. 1276/2007

Date of institution - 27.12.2007
Date of decision - 12.05.2009

Muhammad Akram, S/O Sikandar Khan, C.T. Teacher, Government High School, Kathwal, Abbottabad.....(Appellant)

VERSUS

1. District Coordination Officer, Abbottabad.
2. Executive District officer (S & L) Abbottabad.
3. District Accounts Officer, Abbottabad.
4. Director (S&L) Department, Peshawar.
5. Secretary to Government of NWFP (S&L) Department Peshawar.
6. Accountant General NWFP Peshawar.
7. Secretary to Government of NWFP Finance Department, Peshawar.

Appellant in person present.
Arshad Alam, A.G.P.....For respondents.

MR. ABDUL JALIL.....MEMBER
MR. RISMILLAH SHAH.....MEMBER

JUDGMENT.

ABDUL JALIL, MEMBER : This judgment/order will dispose of this Service Appeal No. 1276 of 2007, by Muhammad Akram and the following Service Appeals. The reason is that the broad facts and the legal issues in all the below mentioned appeals are the same, and need consolidated judgment and joint disposal.

<u>Sl. No.</u>	<u>Appeal No.</u>	<u>Name of appellant.</u>
1.	1277/2007	Saidur Rahman,
2.	1278/2007	Munibur Rahman,
3.	1279/2007	Muhammad Siddique,
4.	01/2008	Maroof Khan
	02/2008	Anjad Hussain Awan

Attested
AA
Govt. High School No. 3
Kathwal Abbottabad

ATTESTED
EXAMINER
Tribunal

[Signature]
ATTESTED

- 257. 504/2009 Muhammad Shamraiz
- 258. 505/2009 Ali Bahadur
- 259. 506/2009 Muhammad Haroon
- 260. 523/2009 Naureen Maqsood
- 261. 524/2009 Yasmeen Akhtar
- 262. 525/2009 Shabana Nazir
- 263. 681/2009 Nighat Bibi
- 264. 682/2009 Waseem Sultan
- 265. 683/2009 Bibi Hajra
- 266. 684/2009 Abdul Razaq
- 267. 685/2009 Fatiha Gul

Attested
 Principal
 Govt. High School No 3
 (Med) Abbottabad

2. The appellant of Service Appeal No. 1276 of 2007, contended that he was appointed as untrained P.E.T. Teacher in Education Department on 27.6.1990. The appellant being C.T trained, was adjusted against the C.T post on 06.05.1996 on regular basis. He acquired higher qualification of M.A. on 25.08.1999. The appellant was entitled to advance increments in the light of the Finance Department notification dated 11.8.1991. The same was not given to him. Some of the teachers came to this Tribunal whose Service Appeals were dismissed in Service Appeal No. 498 of 2006 decided on 24.4.2007. The August Supreme Court of Pakistan, while deciding C.P.L.A No. 525 of 2007 and CPLA No. 526 of 2007 decided that all the teachers were entitled to the advance increments like all other civil servants. On the request of the appellant, the same benefit was not given to him. Hence, he filed the present Service Appeal. As already mentioned, the broad facts and the legal issues in all other appeals are almost on the same lines.

3. The respondents contested the appeal and contended that either the appellants had not submitted applications or their applications were time-barred. And there was no judgment in favour of the appellants.

4. We heard the arguments and perused the record.

The judgment in CPLA Nos. 525 of 2007 and 526 of 2007 is as under:-

Learned Additional Advocate General attempted to argue that in view of the higher scale granted to Elementary School Teachers in

EXAMINER
 NWFP Services
 Peshawar

Attested

ATTESTED

Attested

ATTESTED

4

pursuance of the circular letter dated 07.8.1991, which was personal to them, the petitioners would not be entitled to the incentive of advance increments contemplated by circular letter dated 11.8.1991 but he is unable to cite any principle of law or authority for placing this interpretation. We find that, while circular letter dated 7.8.1991 exclusively deals with the scales of pay of school teachers in different categories, circular letter dated 11.8.1991, provides for the revision of basic pay scales and grant of annual increments and advance increments for all Provincial civil servants in NWFP without any exception. Since the teachers or the employees in Education Department have never been expressly or impliedly excluded from the operation of the circular letter, view taken by the Tribunal being erroneous cannot be sustained at law. In fact, it suffers from clear misconception of law and misconstruction of the circular letter (supra)."

While disposing of the C.R.P No. 216 and 217 of 2007 in C.P Nos. 525 and 526 of 2007, the August Supreme Court of Pakistan held:-

"The learned Addl. Advocate General has contended that this Court while interpreting the circulars in question has taken a view contrary to the correct legal position, according to which private respondents were not entitled to the benefit of advance increments. We are afraid, the learned Addl. A.G instead of pointing out any mistake of law and fact in the judgment made an attempt to re-open the case on merits. The scale of review is very limited and the points already considered in the judgment under review cannot be allowed to be re-agitated in review jurisdiction. These review petitions being without any substance are accordingly dismissed."

While disposing of Crl. O.P. No. 66 & 67 of 2007, it was held by the August Supreme Court of Pakistan:-

"The learned Addl. A.G. has given an undertaking for implementation of the judgment of this Court within a period of two weeks and in view thereof, this criminal original is disposed of with the direction that the

[Handwritten signature]
Principal Magistrate
District Court
Mardan

NWFP Service Tribunal
Examined
Resident

ATTESTED

[Handwritten signature]
ATTESTED

[Handwritten signature]
ATTESTED

18

judgment should be implemented in letter and spirit within two weeks under intimation to the Registrar of this Court."

6. In the above circumstances, and in view of the judgment in rhyme by the August Supreme Court of Pakistan, and keeping in view the provisions of Article 189 of the Constitution of Islamic Republic of Pakistan, we have no other alternative but to declare that all the appellants, after ascertainment that they are the persons similarly placed with the appellants who had previously litigated and in whose favour the judgment mentioned above was given by the August Supreme Court of Pakistan, are entitled to the same benefits as have been given to the appellants of the judgments quoted above. The appeals of such similarly placed persons, after such ascertainment, stands accepted without costs. Each party will bear the cost of the litigation.

7. The official respondents in the above mentioned appeals as well as the other concerned officers/officials in the province are directed to follow the above quoted judgments in their true letter and spirit and without compelling the respective right holders to enter into litigation with the respective official respondents, otherwise the costs of their litigation shall be recovered from the pay and pension as well as person and property of the defaulting concerned officer, though after fixation of responsibility on them as a result of proper enquiry.

8. The remaining similarly placed persons may submit applications/representations to their concerned authorities directly, who shall have to decide their cases as above within a reasonable time.

ANNOUNCED.
12.05.2009.

sd-
(BISMILLAH SHAH)
MEMBER.

sd
(ABDUL JALIL)
MEMBER.

CAMP COURT ABBOTTABAD.

Number of presentation
Number of writs
Copying fee
Stamp
Total

4400 02/7/09
24
24
13/7/09

[Signature]
Service Tribunal
Abbottabad

Attested
[Signature]

[Signature]

(For use in Police Department only).

Passed M Ed Exam under Roll No X 670141 from open University of Ilkhan Iqbal in grade B obtaining 655/1100 marks. Heirs, result declared on 10-09-2009.

Govt. Girls Higher Secondary School 1522 Abbotabad

ANNEXURE

D

- 1.
- 2. Passed B Ed examination under note no 1473 of University of Peshawar in 2nd division in 1993 (A).
- 3. Result declared on 08-5-1994.

Verification Roll No. dated received back

Head Mistress Govt. High School LOBA

Left thumb-impression.

Passed MA (2nd) under roll no 26516 from University of Peshawar and 572 out marks obtained in English Result declared on 30-9-92

1. Passed S.S.C (A) 1983 under R. No 27790 obtaining 439 marks from 28307 B-I-S.E. Peshawar

Date	Qualifications	Date
	First Arts	
	B. L. or B. A.	
	Pleadership examination	
	Training School Final examination	
	Other qualifications—	
2.	passed Intermediate examination (Suppl) 1986 from Board of Intermediate Education Peshawar under R. No 6213 securing 471 marks	
3.	Passed B.A. Examination from University of Peshawar under R. No 62108 securing 258 marks in II Division result declared on 26-3-1992.	

Drill instructing Passed C.T (Short Term) Courses Exam 1992 in 2nd Division under Roll No 1353 Reserve duties 281 marks held at Education Extension Centre Abbotabad Result declared on 09-4-93

N. B. Aine to be drawn under the qualification possessed. Head Mistress Govt. Girls High School LOBA

Govt. Girls High School LOBA

TESTED

17

Thumb and finger impressions
and signature given
or attested. *[Signature]*

3

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.

10.10.2000

1. Name MISS TASLEEM KOUSAR

2. Race Rajput

3. Residence Vill: & P.O. LORA Teh: & Distt Abbottabad

4. Father's name and residence Mr. MOHAMMAD MAHMOOD

Vill: & P.O. LORA Teh: & Distt. Abbottabad

5. Date of birth by Christian era as nearly as can be ascertained 15-11-1967

Fifteenth November N.H. & sixty seven

6. Exact height by measurement

7. Personal marks for identification A cut sign on the left eye brow

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 Tasleem Kouzar

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

[Signature]
M. P. S.
S. G. H. S.
Lora

[Signature]
ATTESTED

No.
Date
m no. T...
L...
L...
1991-92
from
desks
marks
I Division
1992.
2-

AMENDMENT FORM

Undertaking

I undertake to Refrain to be employed
 if found hereafter as a result of in consequence
 of my resignation from the service of MA -

18

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. 37, C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the head "Pay"	Date of appointment	Signature of Government servant
--------------	---	---	-------------------------	--------------------------------	--	---------------------	---------------------------------

Entries revised w.e.f 30-09-1998 in clwith

CT, JGHSS Loya.						Passing of MA Exam: / 04 adv: increments BPS. 14 - 2065-161-4480. Rs. 3514/2	under sanction NO. 7925 dt 25-6-1998 30-09-1998	Tasleem Kous
—	—	—				Rs. 3675/2	01-12-1998	Tasleem Kous
—	—	—				Rs. 3836/2	01-12-1999	Tasleem Kous
—	—	—				Rs. 3997/2	01-12-2000	Tasleem Kous
						Entries revised w.e.f 01-06-1999 in clwith award of S/Grade from B-14 to BPS. 15 Rs. 2190-177-4845.		
—	—	—				Rs. 3783 ① Pre-mature. 177 3960/2	01-6-1999	Tasleem Kous
—	—	—				Rs. 4137/2	01-12-1999	Tasleem Kous
—	—	—				Rs. 4314/2	01-12-2000	Tasleem Kous
—	—	—				Rs. 4491/2	01-12-2001	Tasleem Kous

ATTESTED

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc)	Signature of the head of the office or other attesting officer	Leave		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	
<i>Sanctioned to benefit of Adv. Incant</i>						
<i>Principal</i>	<i>25-6-10-98</i>	<i>inert</i>		<i>Govt. Girls High School LORA Abbottabad</i>	<i>20-12-98 to 30-11-99</i>	<i>Service verified from the Reg Roll and other record of this school.</i>
<i>Principal</i>	<i>30-11-99</i>	<i>inert</i>		<i>Govt. Girls High School LORA Abbottabad</i>		
<i>Principal</i>	<i>30-11-2000</i>	<i>inert</i>		<i>Govt. Girls High School LORA Abbottabad</i>		<i>Service verified from 01-12-99 to 30-11-2000 from the Reg Roll and other record of this school.</i>
<i>Principal</i>	<i>30-11-99</i>	<i>inert</i>		<i>Govt. Girls High School LORA Abbottabad</i>		<i>Advanced Selection Grade from BPS 14 & BPS-15 w.e.f 01-6-1999 vide D.O (F) Secondary Abbottabad Enclst NO 995-1001/S-Grade of 03.3.2001</i>
<i>Principal</i>	<i>30-11-2000</i>	<i>inert</i>		<i>Govt. Girls High School LORA Abbottabad</i>		<i>Drawn as per of S-Grade to B-15 w.e.f 1-6-99 to 31-5-2001 Rs 27502/2</i>
<i>Principal</i>	<i>30-11-2001</i>	<i>inert Plus BPS-revised</i>		<i>Govt. Girls High School LORA Abbottabad</i>		<i>Service verified from 01-12-2000 to 30-11-2001 from the Reg Roll and other record of this school.</i>

ATTESTED

Govt. Girls High School
LORA

Government servant
with
ents
10-7925
38/10
8/10
9/10
10/10
11/10
12/10
13/10
14/10
15/10
16/10
17/10
18/10
19/10
20/10
21/10
22/10
23/10
24/10
25/10
26/10
27/10
28/10
29/10
30/10
31/10
1/11
2/11
3/11
4/11
5/11
6/11
7/11
8/11
9/11
10/11
11/11
12/11
13/11
14/11
15/11
16/11
17/11
18/11
19/11
20/11
21/11
22/11
23/11
24/11
25/11
26/11
27/11
28/11
29/11
30/11
31/11
1/12
2/12
3/12
4/12
5/12
6/12
7/12
8/12
9/12
10/12
11/12
12/12
13/12
14/12
15/12
16/12
17/12
18/12
19/12
20/12
21/12
22/12
23/12
24/12
25/12
26/12
27/12
28/12
29/12
30/12
31/12

SINGLE EMPLOYEE ENTRY

(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
<u>Scale Revised B-15 (5220-420-17820)</u>				
CC4455 Cora		12789	13620 ✓	01-7-2008
		13209	14040 ✓	01-12-2008
		13620	14460 ✓	01-12-2009
		14040	14880 ✓	01-12-2010

2 m. A
12789/08

~~of pay H.~~
1098 to 5799
322x7

6/99 to 11/01
354x30

12/01 to 6/05
530x43 Rs 22799/-

7/05 to 6/07
610x24 Rs 14640/-

7/07 to 6/08
700x12 Rs 8400/-

7/08 to 6/09
840x31 Rs 26040/-

Rs 71870/-

W. M. A. C.
14/2011

13620
12789
840

BASIC PAY SCALES 2011
OFFICE OF THE ACCOUNTANT GENERAL
HYDERABAD
NO. 5220-420-17820-15
AT No. 12789 DATED 1-07-2008
FOR POSTION IN A 1-12-2008

W. M. A. C.
14/2011

STAMPED

(For use in Police Department only)

Heirs:—

① Passed B.Ed Examination from University of Peshawar in 1988 under Roll No 571 and obtain Mark 500/1000 with II Division. The result declared on 02-03-2000. ✓

Head Mistress
Govt. G.H.S. Kargah

② Verification Roll No. _____ dated _____ received back. Passed M.Ed. Examination from A-100 Islamabad in Spring 2004 under Roll No: N618797 mark obtain _____

① Passed S.Sc Exam: from BISE Peshawar in 1980 under Roll No 3422 and obtained 513/850 Marks with Grade - B"
 Left Thumb-impresion

Head Mistress
Govt. Girls High School
KARGHAN

② Passed Intermediate Exam: from BISE Abbottabad in 1982 under Roll No 16797
Qualifications _____ Date _____
+ obtained 614/1100 with Grade 'C'

③ Passed CT (General) from Govt. College of Edu. for Elementary Teachers (Women) English Pushto Ghazipur + (Manselwa) in 1985 under Roll No 692 and obtained 923/1200 Marks with Ist Division and the result declared on 25/5/1986. ✓
First Arts B.L. or B.A. Leadership Examination Training School Final Examination

④ Passed BA Exam: from Peshawar University in 1995 under R/No. 38779 and obtained Marks 274/550 with IInd Division. The Result was declared on 07-03-1996. ✓
Finger Print Drill Instructing Court Duties

Reserve Duties to sp/No. 04

Attest to sp/No. 04

⑤ Passed MA (Widus) Exam from Peshawar University in 1998 under Roll No 21838 and obtained Mark 585/1100 with IInd Div. The Result was declared on 25-08-1998. ✓

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

H.M. Ghazipur Govt. Girls High School KARGHAN. The Result was declared on 25-08-1998.

ATTESTED

Head Mistress
Govt. G.H.S. Kargah

NIC No: 121-93-039714

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: MM NAEEM AKHTER ✓

2. Race Karal / Islam / Pakistan

3. Residence Mohallah Musa Zai, Vill + Po Nawar Shehr (Abbottabad)
NWFP


4. Father's name and residence Mr. Hayat Mohammed ✓ As above


5. Date of birth by Christian era as nearly as can be ascertained (05-12-1973) Fifth of December,
NH + Seventy three.

6. Exact height by measurement 5-3

7. Personal marks for identification nil

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 Naeem Akhter

10. Signature and Designation of the Head of the Office, or other Attesting Officer. Shayy Begum


ATTESTED

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant
		(a) ✓					
SV Mistress, 49 HS, Kagha (Mansarovar) Off.						02 12 / 95	✓ Name - AK...
<p>Grade J. 1605-97-3060/BPS-08.</p> <p>Revised Entries/Pay fixed in the light of Govt. Notification dated 29-8-1992, Award of BPS-10 on the basis of BA, CT (Trd.) Ind Division, W-e. from 25-05-1996 25-05-1996. (CT Result date)</p>							
— do —						25 05 / 96	Name - ...
2065-161-4480				(2065) ✓			
					R. 2065/1 ✓		
					RAGHAN		
— do —				2184/1 ✓		1 12 / 96	Name - ...
				2326/1 ✓			
— do —		Cultures College		2387/1 ✓		1 12 / 97	Name - ...
				2387/2 ✓			
— do —						01 12 / 98	Name - ...
				Rs. 2548/ ✓			
						01 12 / 99	Name - ...
— do —				2709/ ✓			
						01 12 / 2000	Name - ...
				2870/ ✓			
						12 / 01	Name - ...
				3031/ ✓			

ATTESTED

9 Name and position of the head of office or other attesting officer in stations 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
				Name 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		
Headmistress Govt Girls High School KAGHAN	31-8-96	Revised Entry	Headmistress Govt Girls High School KAGHAN		Appointed as SV Mistress, BPS-09 @ B. 1605-97-3060 with Divisional Director of Edu. (Schools) Hazara Div. A.P. No. 16/F-12/PT(C) dated 30-11-1995 Issued under Order No. 16342-46/AE-III/F-14 PT(C) of even date. and the term over charge on 02-12-95		
Headmistress Govt Girls High School KAGHAN	30-11-96						
Headmistress Govt Girls High School KAGHAN	30-11-97	Cherry Begum			Service verified w.e.f 2-12-95 to 31-12-96 from the Acvt. Bd. & other office record.		
Headmistress Govt Girls High School KAGHAN	30-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		
Headmistress Govt Girls High School KAGHAN	11-11-97		Headmistress Govt Girls High School KAGHAN		Service verified 1-1-97 to 30-8-97		

ATTESTED

Govt Girls High School
KAGHAN DDC

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar (Pakistan)

Session ANNUAL 1998

NAEEM AKHTAR

Son/Daughter of

HAYAT MOHAMMAD

and a student of /private candidate of

DISTRICT ABBOTTABAD

having passed the prescribed examination held in

APRIL, 1999

is this day admitted by the University of Peshawar to the Degree of
Master of Arts

In

URDU

In

SECOND

Division

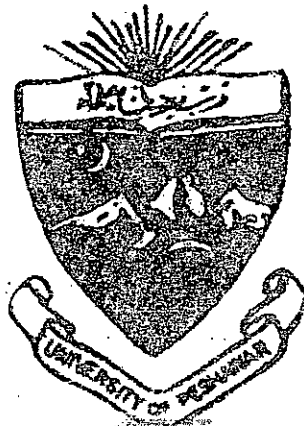
ATTESTED The Examination was taken as a whole/in parts

Serial No 0068160

Registration No. 92-AG-3968

Roll No. 21838

Dated, Issued on 25th Aug, 1999.



J. I. A. R. Q.
Registrar

AM
Nazim Ahmad
Assistant Professor
Govt Postgraduate College
Abbottabad

Countersigned

[Signature]
Vice-Chancellor

(For use in Police Department only)

feirs:-

- 1.
- 2.
- 3.



TEM

is
Ab

Verification Roll No. dated received back.

Left Thumb-Impression

Qualifications	Date	Qualifications	Date
English	Passed Matric under Roll no, 833 - from Peshawar Board - she	First Arts	Passed B.A examination under Roll no 64647 - she obtained 288 marks out of 550 - and has been
Pushto	obtained 543 marks out of 850 and has been placed in Grade 'B' P.D.D. 11/8/92	B.L. or B.A.	Placed in second Division P.D.D. 7-3-96
Urdu		Pleadship Examination	
Plan-Drawing	Sub-Divisional Education Office (FEMALE) Peshawar.	Training School Final Examination	
Finger Print	Passed P.A. examination under Roll no, 5233 - from Peshawar Board. she obtained 530 marks out of 1100 and has been placed in Grade 'D' P.D.D. 1992	Other Qualifications:	Passed P.T.C examination under Roll D-6071344 She obtained 58% marks and has been placed in Grade 'B' P.D.D. 01-04-1996
Drill Instructing			
Court Duties			
Reserve Duties			

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

ATTESTED

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: Nazneen

2. Race: Pathan / Shinwari

3. Residence: House No 1906 Mohallah Kalgan Nabal
Bibi Zakeria Imam Bata ^(Sun) Peshawar.

4. Father's name and residence: Sher Mohammed (late)

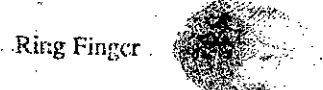
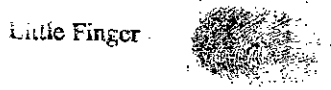
5. Date of birth by Christian era as nearly as can be ascertained: 20-9-73 ✓

6. Exact height by measurement: 5 foot, 5 inch

7. Personal marks for Identification: Scars left hand

Date
rabion
547 -
marks
com
3-96
344
%
ed in
1-04-1996

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.



9. Signature of Government Servant: Nazneen

10. Signature and Designation of the Head of the Office, or other Attesting Officer: Sullman
Sub-Divisional Education Officer
(General) Peshawar

ATTESTED Nazneen

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
PTC			PBR. 7	Rs 1480		-81-2695	
GGPS Garghetzi No-2			Rs. 1480/	PM.		25-5-96	<i>[Signature]</i>
			PBR. 9	1605		-97-3060	
<i>[Signature]</i>			1605/	✓		25/5/96	<i>[Signature]</i>
<i>[Signature]</i>			1702/	✓		1/12/96	<i>[Signature]</i>
<i>[Signature]</i>			1799/	✓		1/12/97	<i>[Signature]</i>
			Rs. 1896/	PM.		1/12/96	<i>[Signature]</i>
GGPS Garghetzi No 2			1896 + 291 =	Rs. 2187/		22/3/99	<i>[Signature]</i>
<i>[Signature]</i>			Rs. 2284/			01-12-99	<i>[Signature]</i>
<i>[Signature]</i>							
ATTESTED							

TH

is A

29

3

8	9	10	11	12	13	14	15	
Signature of the head of the office or other attesting officer in column 8	Signature of the head of the office or other attesting officer in 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	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and 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		
		25/5/96	Placed in BPS 4	[Signature]	Government to which debitable			Appointed against a vacant PTC Post at SSPS Sangri No 2 Ser. in BPS No. (07) 15 1480-81 2695 2 m Plus usual allowances as admissible under the rules vide DEO (P) Dist. Encl. No. 980-1010 / E.N. 5 / APPN / PTC / 2-28 dated 13-5-96 at Sr. 4.
	[Signature]	30/11/96	Education Peshawar	[Signature]				
	[Signature]	30/11/97	Instr	[Signature]				
	[Signature]	30/11/98	Instr	[Signature]				Sub Divisional Education officer (Female) Peshawar
			Drawn from BPS 4					Allowed BPS No. (09) on Paying F.A Band for BISE, Dist in Dist Dirn District vide DEO (P) Dist Encl. No. 431, dt. 2/8/97.
	[Signature]	30/11/99	Income on BA	[Signature]				Sub Divisional Education officer (Female) Peshawar
	[Signature]	30/11/97		[Signature]				Permanently referred from 25/5/96 to 31/12/97 Primary Roll and other office record
	[Signature]	30/11/97		[Signature]				
	[Signature]	30/11/97		[Signature]				
	[Signature]	30/11/97		[Signature]				
	[Signature]	30/11/97		[Signature]				

الجامعة الإسلامية

University of Peshawar (Pakistan)

Session ANNUAL 1999

HAZNEEN

Son/Daughter of SHER HUMAMAD

DISTRICT PESHAWAR

and a student/ private candidate of

having passed the prescribed examination held in JANUARY, 2000

is this day admitted by the University of Peshawar to the Degree of

Master of Arts

In

Urdu

In SECOND Division

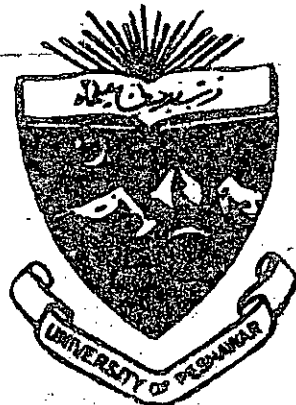
The Examination was taken as a whole ~~in parts~~

Serial No. 0063756

Registration No. 94-PC-34891

Roll No. 26638

Result Declared on 30th Aug, 2009



Registrar

Countersigned

Vice-Chancellor

30

کورٹ فیس

وکالت نامہ

Service Tribunal Peshawar

بعدالت

Tasleem Kousar

عنوان: Crout UPK & Others بنام

Petitioner (Tasleem Kousar)

منجانب:

نوعیت مقدمہ: Execution Petition

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Ch: Abdul Razaq Chohan Adv High Court At 100

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء و ضوئی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المقوم: 21/9/2019

بمقام: Abbottabad