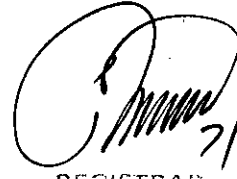


The appeal of Mst. Safia d/o Laif Shah GGPS Turkistan Bzk Khel Khyber Agency Charsadda received today i.e on 04.08.2023 is incomplete on the following score, which returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Check list is blank which be filled up.
2. Appeal has not been flagged/marked which annexures marks.
3. Annexures of the appeal are unattested.
4. The law under which appeal is filed is not mentioned.
5. Page nos. 16 to 19 of the appeal are illegible which may be replaced by legible/better one.

No. 3004 /S.I.

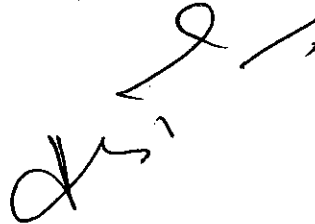
Dt. 7/8 /2023.


7/8/23

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Adeel Butt Adv.
High Court Peshawar.

- 1) Check list attached.
- 2) needful done
- 3) needful done
- 4) needful done
- 5) needful done



**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 1633 / 2023

Safia Bibi Appellant

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Education and
others..... Respondents

INDEX

S.No	Description of documents	Annex:	Page
1	Grounds of Appeal along with Affidavit	*	1-5
2	Addresses of the Parties	*	6
3	Copy of the Appointment Order	A	7
4	Copies of Transfer and Re-deployed order	B-C	8+9
5	Copies of salary slips	D	10+19
6	Copy of departmental appeal	E	20
7	Wakalatnama		21

Safia
Appellant

Through

Dated: 03.08.2023

Muhammad Adeel Butt
Muhammad Adeel Butt

&

Humera Gul
Humera Gul
Advocates High Court

(1)

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service-Appeal No. 1633 / 2023

Safia D/O Laiq Shah
GGPS Turkistan BZK LKL, Khyber Agency
R/O Umarzai, Charsadda DistrictAppellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar
2. Director of Education, Directorate of Education situated at GT Road Peshawar City.
3. District Education Officer, DEO Office, District Khyber
...Respondents

APPEAL, AGAINST THE INACTION OF
RESPONDENTS, WHEREBY THE APPELLANT
HAS NOT BEEN PAID HER MONTHLY
SALARIES BY THE RESPONDENTS AND, NOT
ALLOWING HER TO PERFORM HER OFFICIAL
DUTIES WITHOUT ANY REASON.

Prayer:

On acceptance of appeal the appellant may please be allowed to perform her duties with all back benefits. Any other remedy deems fit may also be granted under the circumstances.

Respectfully Sheweth:

The Appellant submits as under: -

1. That, consequent upon the approval of Departmental Selection Committee, The Appellant was accordingly appointed against the vacant post of T.T on 25.08.2009 at

Government Girls' Primary School, Latif Kalay, Bara Khyber Agency, in BPS -07. (Copy of the Appointment order is annexed as Annexure "A")

2. That due to the Talibanisation and usual law and order situation at that time the Appellant was Transferred to GGPS Muslim Jan Killi Bara on 30.04.2014 against vacant Post and later on re-deployed to GGPS Zulfiqar Killi LKL on 21.05.2015. The Appellant performed her duties to the best satisfaction of Respondents and hence the respondents were paying her monthly salaries till 2017. (Copies of Transferred and Re-deployed are annexed as Annexure "B" & "C")
3. That since the respondents without any reason stopped her salaries and she has been stopped verbally not to perform her official duties. Appellant was not given monthly salary, for which Appellant has submitted several applications for releasing her salaries, but in vain. It is important to mention that the respondents have not issued any letter regarding stoppage of her pay/salary nor there is any charge against her. The Appellant tried her level best and knocked every door in order to get her salaries paid but the Respondents have taken no action whatsoever. (Copies of Salary Slips are annexed as Annexure "D")
4. That finally the Appellant filed a departmental representation/ appeal before the Respondents on 30.03.2023 and waited for the stipulated period of time but as mentioned above no action whatsoever has been taken by them. (Copy of Departmental Appeal is annexed as Annexure "E")
5. That the Appellant feeling aggrieved from the inaction of Respondents files the instant Service appeal inter alia on the following grounds: -

GROUNDS:

- A. That the Appellant has not been treated in accordance with law.
- B. That it is a settled principle of Law that no one can either stop the salary of a Civil servant or stop one in performing his duty without adopting the due process of law without adopting due course of law, no one can stop the can salary.
- C. This act / inaction of Respondents against the Appellant is violation of the principles of policy contained in Chapter 2 part-II of the constitution and also Article 3 of the Constitution, which cost duty on the state to eliminate all forms of exploitation.
- D. That the above mentioned issue has sufficiently been dilated in the recent judgment of this Court in case, "Abdul Latif and others Vs Secretary C&W Department Khyber Pakhtunkhwa, Peshawar and 5 others 2014 PLC (C.S) 330, wherein it is held that:

"Their appointments are not questioned to have been made in violation of law. They are working since their appointment in January, 2013 without salaries, which is harsh in nature. The record is also silent about any query from the appointing authority of the petitioners to the effect as to whether appointments were made in violation of law or without observing the legal and formal codal formalities, required for appointment. Though there appears no illegality in the appointment of the petitioners, even then, if any irregularity is alleged and based for non-issuance of NOC, the same could not be made as hurdle by the concerned authorities, as the appointment of an employee, if in any case made against the established procedure, would not burden him, rather the appointing authority would be responsible for committing misconduct by making

irregular appointments. Reliance in this respect is placed on the case of Province of Punjab through Secretary Agriculture, government of Punjab and others V. S Zulfiqar Ali (2006 SCMR 678)."

It is hereby worth important to mention that no reason whatsoever has been communicated to the Appellant with respect to stoppage of her Salary and performance of duty.

- E. The Secretary, Establishment Division, Government of Pakistan and others 1996 SCMR 1185 as under: (at page 1193 para 16). Para 16. "If a Tribunal or this Court decides a point of law relating to terms and conditions of a civil servant who litigated, and there were other civil servants, who may not have taken any legal proceedings, in such a case, the dictates of justice and rule of good governance demand that the benefit of the said decision be extended to other civil servants also, who may not be parties to that litigation instead of compelling them to approach the Tribunal or any other legal forums" Same view has also been applied to the case of Tara Chand and others V. Karachi Water & Sewerage Board, Karachi 2005 SCMR 7 (Prov. Govt. Vs. Niaz Ali & others) 499 (at page 506 para 10) and Govt. of Punjab through Chief Secretary Education & others Vs. Sameena Parveen 2009 SCMR 1 (at page 4 para 6).
- F. That the Appellant being a married woman having little kids knocked the doors of Respondents but till now no action whatsoever has been taken in respect of her salaries and performance of duty.
- G. That the Respondents are well aware about the fact that from the years 2000-2011, the whole Khyber agency was the victim of terrorism, and much of the official record of school along with School buildings was destroyed and it is

(5)

quite impossible for them to find out the record related to Appellant with respect to her performance in schools, hence they purposely are delaying the matter.

H. That the Appellant belongs to a very poor family and teaching is the only source of income.

It is, therefore, most humbly requested that on acceptance of this appeal, respondents may kindly be directed to release/ pay the monthly salaries of the Appellant from year 2017 till date and the appellant may please be allowed to perform her duties with all back benefits.

Any other remedy deems fit may also be granted under the circumstances.

Dated: 03.08.2023

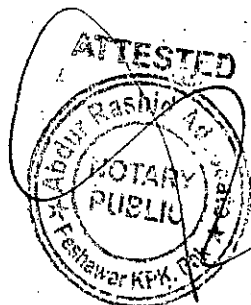
Sofia
Appellant
Through
[Signature]
Muhammad Adeel Butt
&
[Signature]
Humera Gul
Advocates High Court

Note: No such appeal has ever been made to Service Tribunal on the subject by the appellant or in any other court of Law.

Sofia
Appellant

AFFIDAVIT

As per direction of my client I, do hereby solemnly affirm and declare on oath that all the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



②

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. _____ / 2023

Safia BibiAppellant

Versus

Govt. of Khyber Pakhtunkhwa through Secretary Education and others
.....Respondents

ADDRESS OF THE PARTIES

APPELLANT:

Safia D/O Laiq Shah
GGPS Turkistan BZK LKL, Khyber Agency
R/O Umarzai, Charsadda District

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar
2. Director of Education, Directorate of Education situated at GT Road Peshawar City.
3. District Education Officer, DEO Office, District Khyber

Safia
Appellant

Through

Dated: 03.08.2023

Muhammad Adcel Butt
Muhammad Adcel Butt

&

Humera Gul
Humera Gul
Advocates High Court

(7)

AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD

APPOINTMENT ORDER

Consequent upon the approval of the Departmental Selection Committee the following fresh (Female) Local/Non Local candidates of Khyber Agency are hereby appointed against PTC vacant Post regular basis (Non Pension able) at the school noted against their name in BPS No.07 on national pay scale @(3530-190-9220)P.M plus usual allowances as admissible under the rules with effect from 1/9/2009 the date of her taking over charge in the interest of public service.

S.No	Name/Father's Name	Post at	Remarks
01	Navida Begum D/o Hafizullah	GGPS Foud China Bara	Against vacant PTC Post
02	Safia D/o Liaq Shah	GGPS Turkistan BZK LKL	Against vacant PTC Post
03	Khadija Shah D/o Haji Gui Badshah	GGPS Muhammad Hussain Killi Bara	Against vacant PTC Post
04	Samia Begum D/o Muhammad Rafique	GGPS Turkistan BZK LKL	Against vacant PTC Post

Note:-

1. Charge report should be submitted to all concerned.
2. The appointment of the candidate is purely on temporary basis and is liable to terminate any time without any notice.
3. If the candidate wishes to resign her post she will give one-month prior notice and her pay for one month will be forfeited in lieu thereof.
4. Her documents, date of birth and NIC should be checked before handed over charge of the post and attested copies thereof may be kept on record of the school/office.
5. She should produce his Health and Age certificate from the Agency Surgeon as required.
6. She may not be handed over charge if he is below 18 years or above 40 years.
7. If he fails to report her school within 15 days of the issue of this appointment order then it will be treated as cancelled.
8. No salary may be drawn before the verification of all the testimonials from the quarter concerned.
9. The appointment will not be entitled for pension/commutation and G.P Fund emoluments as per Govt. policy.

(HASHIM KHAN)

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst. No. 3776-96 /PS/5/F

Dated Jamrud the 25 / 08 /2009.

Copy of the above is forwarded to the:-

1. Director Education (FATA) at Peshawar.
2. Agency Accounts Officer Khyber Agency at Jamrud.
3. Agency Surgeon Khyber Agency at LandiKotal.
4. AAEO (Female)/ Pay Clerk Concerned.
5. Official Concerned.

AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD



AGENCY EDUCATION OFFICE
KHYBER AGENCY AT JAMRUD
PHONE. 091-5820584 FAX 091-5820584

AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD.
TRANSFER ORDER

Consequent upon the proposal of AAEO (Female) Tehsil Bara/LKL/Jamrud Khyber Agency the following Female PTC teachers of Tehsil Landi Kotal Khyber Agency are hereby transferred to their schools noted against their names in their own pay and scale with immediate effect in the interest of public.

S.No.	Name/Desi:/School	To	Remarks
01	Safia PST GGPS Turkistan BZK LKL	GGPS Musam Jan Killi Bara Khyber Agency	Against Vacant Post
02	Samia Begum PST GGPS Turkistan BZK LKL	GGPS Akhtar Ali Shah Killi Bara	Against Vacant Post
03	Mehnaz PST GGPS Janas Khan KilliJamrud	GGPS Abdul KarimKilliJamrud	Vice S.No.04
04	Zainab Shah PST GGPS Janas Khan KilliJamrud	GGPS Abdul Karim Kill Jamrud	Vice S.No.03
05	Khatira PST GGPS Abdul Karim Kill Jamrud	GGPS Janas Khan Killi Jamrud	Under complaint
06	Zeenat PST GGPS Abdul Karim Killi Jamrud	GGPS Janas Khan Killi Jamrud	Under complaint


- Note:
1. Charge report should be submitted to all concerned.
 2. No TA/DA is not allowed

(ATTIQ UR RAHMAN)
AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD

Endst:No. 3713-17Transfer file Dated 30/04/2014

Copy forwarded to the:

1. Director Education (FATA) at Peshawar.
2. Agency Accounts Officer Khyber Agency at Jamrud.
3. AAEO Concerned local office.
4. Superintendent local office.
5. Individual concerned.
6. EMIS Cell local office.


AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD



AGENCY EDUCATION OFFICE
KHYBER AGENCY AT JAMRUD
PHONE. 091-5820584 FAX 091-5820584
NO _____ DATED: 21/05/2015

AGENCY EDUCATION OFFICE KHYBER AGENCY AT JAMRUD

REDEPLOYMENT ORDER.

Consequent upon the recommendation of AAEO (Female) Jamrud/Bara the following teachers of Tehsil Bara are hereby redeployed to Schools noted against their names on their own request with immediate effect, till the re-opening of their own Schools.

S.#	Name	Desg	From	Redeployed to
1	Shaheen AKhtar	TT	GGMS Tehsil Bara	GGHS Jamrud.
2	Nusrat Begum	SST	GGHS Karigar Bara.	GGHS Jamrud
3	Farida	CT	GGHS Karigar Bara.	GGHS Jamrud
4	Shamshad Begum	PST	GGHS Karigar Bara.	GGHS Jamrud.
5	Farzana Jamal	CT	GGMS Malang Garhi	GGHS Jamrud
6	Safia Begum	PST	GGPS Musam Jan Killi Bara	GGPS Zulfiqar Killi LKL
7	Saima Zarin	PST	GGPS Musam Jan Killi Bara	GGPS Mira Jan Bara
8	Rooqia Bibi	TT	GGPS Latif Killi Shalobar Bara	GGPS Hayat Shah Killi Mulagori Jamrud
9	Saima Begum	PST	GGPS Akhtar Ali Shah Bara	GGPS Hayat Shah Mulagori Jamrud

Note: Charge report should be submitted to all concerned.
TA/DA is not allowed.

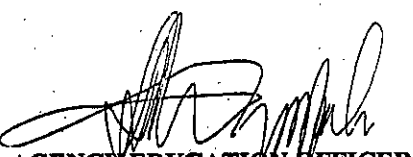
**AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD**

Endst: No. 13241-46 Redeployed File

Dated :21/05/2015

Copy forwarded to the:

- 1 Director Education FATA at Peshawar.
- 2 Political Agent Khyber Agency at Peshawar.
- 3 Principal GGHS Jamrud Khyber Agency
- 4 AAEO (F) Local Office.
- 5 Superintendent local office
- 6 Officials concerned.


**AGENCY EDUCATION OFFICER
KHYBER AGENCY AT JAMRUD**

10

(For use in Police Department only)

te:-

Heirs:

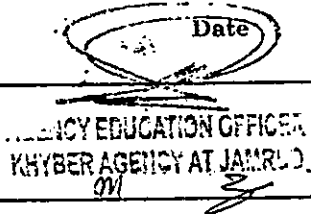
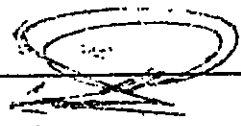
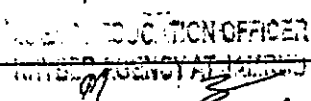
1. ① passed of SSC EXAM 1999 (Supply)
2. FROM BTSE, PESHAWAR UNDER Roll No. 2218
3. obtained marks 385/850

Verification Roll No.

dated **AGENCY EDUCATION OFFICER**
KHYBER AGENCY AT JAMROO received back

Left Thumb Impression

- ② PASSED OF F.A EXAM 2003 (Annual)
- FROM BTSE PESHAWAR UNDER Roll No.
- 67677 obtained marks 520/1100.

Qualification	Date	Qualification	Date
English		First Arts	
Pushto	③ <u>passed of PTC EXAM</u>	B.L. Or B.A.	
Urdu	<u>7006 FROM Alliance Jambul</u> <u>open UNIVERSITY Islamabad.</u>	Pleadership examiantion	
Plan-drawing	<u>Under Roll No. Q 601825 obtained</u> <u>marks 59/100</u>	Training School Final examiantion	
Finger Print		Other qualification:-	
Drill Instructing			
Court Duties			
Reserve Duties			

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

(11)

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.

Name: SAFIA

Race: HARSADDA

Residence: P/O UMLAYAN N/A HARSADDA

1. Father's name and residence: LAIO SHAH

5. Date of birth by Christian era as nearly as can be ascertained: 27-0 14/04/1983
FOURTEEN APRIL, N/A EIGHT THREE

3. Exact height by measurement: 5-5"

7. Personal marks for identification: NIL

6. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger



Ring Finger



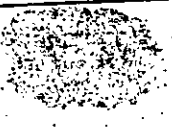
Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant: Safia

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

AGENCY EDUCATION OFFICER
N/A AGENCY AT CA
B. H. 3

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 G.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant	
P.T.C								
GIGPS Turkistan Killa BZK LKL						9 1/2009		
			Rs 3530	PM		12 1/2009	Safdar	
			Rs 3720	PM		12 1/2010	Safdar	
			Rs					
		Revised BPS-07 (5800-320-15400)						
			Rs =	6120	PM	7 1/2011	Safdar	
			Rs =	6440	PM	12 1/2012	Safdar	
			Rs =	6760	PM	12 1/2012	Safdar	
			Rs =	7080	PM	12 1/2013	Safdar	
GIGPS Muzam Jan Killa Baza			Rs =	7400	PM	12 1/2014	Safdar	
Khyber Agency		Revised of P7 BPS-07 (7490-4157) (P7 (10))						
			Rs =	9565	PM	7 1/2015	Safdar	

9	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 debitable to another Government		
		Period	Government to which debitable				
				Appointed Against PTE post in Regular non pensionable post of (3530-190-9230) plus travel allowance as admissible under the rules vide AEO Khyber Encl no. 4070-76/ENR A-I/1/1 Khyber dated 25-08-2009.			
	11 30/2009						
	11 30/2009						
AEO KHYBER	11 30/2010		AEO KHYBER				
	6 30/2011	Revised pay				AGENCY EDUCATION KHYBER AGENCY	
	11 30/2011	Annual Award					
	11 30/2012	Annul					
	11 30/2012	Annul					
	11 30/2014	Annual Inc.					
	6 30/2015	Revised pay					

From 1-7-2009... to 30-11-2015
From the bill and order records

AGENCY EDUCATION KHYBER AGENCY

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 "p"	Date of appointment	Signature of Government Servant	Signature and name of head of office in attestation column
PTC G.P.S. Jaisankar Jan. with Breen Kishan Reddy		BPS-7 (7490-40-19940)	Rs = 9980/- PM			1 ¹² / ₁₅	Sabbir	
	Revision of pay	BPS-07 (9220-510-24520)						
		Rs =	12280/PM			1 ⁷ / ₂₀₁₆	Sabbir	
		Rs =	12790/PM			1 ¹² / ₂₀₁₆	Sabbir	

16

01 Month-June 2012
AGENCY EDUCATION OFFICER
Min. Off. A & W. A. S. F. R.

NTN:
GPF #: Old #:

Interest Free

Active Temporary
DAYS AND ALLOWANCES:

0001 Basic Pay	RH0012 -46	
1000 House Rent Allowance		3720.00
1210-Convey Allowance 2005		1059.00
1300-Medical Allowance		1,785.00
1528-Unattractive Area Allow		1,000.00
1948-Adhoc Allowance 2010@ 50%		1,700.00
		2,700.00

Gross Pay and Allowances

DEDUCTIONS:

GPF Balance 1205.00
3661-E.E.F (Exchange)

Subrc: 596.00
50.00

Total Deductions

646.00

Gross Pay and Allowances
DEDUCTIONS:

GPF Balance 1205.00

NET 11,318.00

D.O.B LFP Quota: 4

01.05.1980 HABIB BANK LIMITED UMARZAI

2 Years 10 Months 001 Days 18577100070303

D.O.B LFP

2 Years 10 M

17

01 Months 2010
AGENCY EMPLOYMENT OFFICER
Min Of P & I A.P. S.E.

PTN.
GPF #
Old #

07 Active Temporary
PAYS AND ALLOWANCES:

0001-Basic Pay	16,040.00
1000-House Rent Allowance	911.00
1210-Convey Allowance 2005	1,785.00
1300 Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,700.00
1557-Washing Allowance	150.00
1948-Adhoc Allowance 2010@ 50%	2,767.00
2148-15% Adhoc Relief All-2013	491.00
2199-Adhoc Relief Allow @10%	323.00
Gross Pay and Allowances	27,271.00

PHON: 2 36

Gross Pay at

DEDUCTIONS:

DEDUCTIONS:

GPF Balance 25,850.00	Subrc: 596.00	GPF Balai
3661-E.E.F (Exchange)	50.00	
Total Deductions	646.00	NET 26,625

D.O.B LFP Quota: 4

01.05.1980 HABIB BANK LIMITED UMARZAI

16 Years 10 Months 001 Days 18577100070303

D.O

11

81

STATE AGENCY EDUCATION OFFICER
NAME: SAFLA
PTC
CNIC No: 1730150757901
GPE Internal Code: 07 Active Temporary

07 Active Temporary	810013	46
PAYS AND ALLOWANCES:		
0031 Basic Pay	16,000.00	
1000 House Rent Allowance	911.00	
1210 Convey Allowance 2005	1,285.00	
1400 Medical Allowance	1,500.00	
1520 Unattractive Area Allow	1,700.00	
1567 Washing Allowance	150.00	
1908 Adhoc Allowance 2011 @ 50%	2,767.00	
2148 15% Adhoc Relief All 2013	491.00	
2199 Adhoc Relief Allow @ 10%	323.00	
Gross Pay and Allowances	27,271.00	

DEDUCTIONS:

GPF Balance	21,338.00	Subrc/	596.00
3663-E.T.F (Exchange)			50.00
Total Deductions	646.00		

Gross Pay and Allowances
DEDUCTIONS:

GPF Balance	21,338.00	Subrc:	
NET	26,625.00		

STATE AGENCY EDUCATION OFFICER
NAME: SAJIA
PTC
CNIC No: 1730150757901
GPE Internal Code: 07 Active Temporary

07 Active Temporary	810013	46
PAYS AND ALLOWANCES:		
2211 Adhoc Relief All 2010 10%	1,004.00	

Gross Pay and Allowances
DEDUCTIONS:

GPF Balance	21,338.00	Subrc:	
Total Deductions	646.00		
NET	26,625.00		

19

P. No. 001 Month October 2017

KH0012 AGENCY EDUCATION OFFICER K

Min. Of K.A & N.A & S.F.R

Pers # 50170130

Backup

Name: SAFIA

NTN.

P.T.C

GPF #:

CNIC No.1730150757901

Old #:

GPF Interest Free

07 Active Temporary

KH0012 -46

PAYS AND ALLOWANCES:

0001-Basic Pay	19,210.00
1000-House Rent Allowance	911.00
1210-Convey Allowance 2005	1,785.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,700.00
1567-Washing Allowance	150.00
2148-15% Adhoc Relief All-2013	491.00
2199-Adhoc Relief Allow @10%	323.00
2211-Adhoc Relief All 2016 10%	1,604.00
Gross Pay and Allowances	29,595.00

DEDUCTIONS:

GPF Balance 24,064.00	Subrc:	710.00	
3661-E.E.F (Exchange)		50.00	
3701-Benevolent Fund(Exchange)		120.00	
3705-R. Ben & Death Comp(Exch)		300.00	
Total Deductions		1,180.00	NET 28

D.O.B LFP Quota: 4



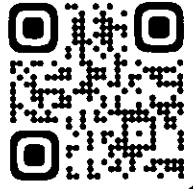
D.O.B

01.05.1980 HABIB BANK LIMITED UMARZAI

18 Years 02 Months 001 Days

18577100070303

18

قیمت 50 روپے	5386	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈویکٹ:	بار کونسل ایسوسی ایشن نمبر: BC-10-9467	  
	رابطہ نمبر: 0334-9166514	

بعدالت جناب: _____ لیسٹروٹو اسٹیمپس کے ساتھ

دعویٰ:	مخاطب: مشتعل
علت نمبر:	
مورخہ:	
جرم:	
تھانہ:	

لفظہ نیکی بنام الجھوکسن

باعت تحریر آتکہ

لفظہ ذویب ضیا من کلین حافظ آباد ڈاکخانہ عمر زلفی کھل وضع جارہے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام لیشاہد کیلئے محمد عدیل بدے، جھلمل ایڈووکیٹس کو دیل مقرر کر کے اقرار کیا جاتے ہیں صاحب موصوف کو مقدمہ کی کل کارروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوالی مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا ہند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



المرقوم: 03/8 /2023

المقام لیشاہد

Amment