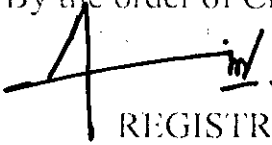


FORM OF ORDER SHEET

Court of _____

Appeal No. 2473/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/11/2023	<p>The appeal of Mr. Sher Ajam Khan resubmitted today by Mr. Kamran Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Pareha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Sher Alam Khan received today i.e on 24.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of promotion order of the appellant to the post of SPST and PSHT is not attached with the appeal be placed on it.

No. 3707 /S.T.

Dt. 27/11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kamran Khan Adv.
High Court Peshawar.

R/sir,

The appellant is coming as PSF and he had not been promoted to the post of SPST and PSHT, however through the instant appeal the appellant is seeking his promotion anti dated.

Resubmitted
Kamran Khan
Adv.
28/11/2023.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL No. 2473/2023

SHER AJAM KHAN

VS EDUCATION DETP:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
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4.	Order dated 20.07.2019	C	6
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6.	Working paper and order dated 02.01.2015	E&F	8-9
7.	Service book	G	10-25
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THROUGH: **APPELLANT**
KAMRAN KHAN
ADVOCATE
HIGH COURT PESHAWAR
0344-9118844
kamrank60@gmail.com

-1-

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

SERVICE APPEAL NO. 2473/2023

Mr. Sher Ajam Khan, PST (BPS-12),
GPS Quli Khel (Domel), District Bannu.

.....APPELLANT

VERSUS

- 1- The Director (E&S) Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Bannu.
- 3- The District Account Officer, District Bannu.
- 4- Mr. Hamid Ullah Khan, PSHT (BPS-15) GPS Kot Pusha Ghorivala, District Bannu.
- 5- Mr. Aslam Pervez, PSHT (BPS-15) GPS Zalim Din Janikhel, District Bannu.
- 6- Mr. Hazrat Ullah, PSHT (BPS-15) GPS Dhandi Wazir, District Bannu.
- 7- Mr. Javed Anjum Qureshi, PSHT (BPS-15) GPS Camp. GhulamJan Killa, District Bannu.
- 8- Mr. Muhammad Naeem Shah, PSHT (BPS-15) GPS Saleh Khan, Fazal Haq Malwana, District Bannu.
- 9- Mr. Atta Ullah Khan, PSHT (BPS-15) GPS Nazir Ullah Janikhel, District Bannu.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED INACTION OF THE RESPONDENTS BY NOT GRANTING ANTI-DATED PROMOTION TO THE POST OF SPST AND PSHT (BPS-15) W-E-F 02.01.2015 WITH ALL BACK BENEFITS INCLUDING SENIORITY AND AGAINST THE FOR WRONG FIXATION OF PAY AND BY NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this service appeal the respondents may kindly be directed to consider the appellant for ante-dated promotion to the post of SPST (BPS-14) and to PSHT (BPS-15) w-e-f 02.01.2015 with all back benefits including seniority and the pay of the appellant may kindly be fixed w-e-f 28.01.1998 to 05.07.2018 with all consequential benefits. Any other remedy which this august Tribunal deems fit that may also be granted in favor of the appellant.

R/SHEWETH:
ON FACTS:

- 1- That the appellant was appointed as PTC now PST in the respondents department vide order dated 05.07.1984. Copy of the appointment order is attached as annexureA.
- 2- That in pursuance to the appointment order, the appellant assumed the charge of his post. Copy of the charge report is attached as annexureB.
- 3- That while performing his duty with zeal and zest and up to the entire satisfaction of his high ups the appellant was charged in case FIR No. 20 dated 28.01.1998, due the said case the appellant was unable to perform his duty and remained absent from duty, however the appellant after honorable acquittal from the charges was reinstated in to service vide order dated 20.07.2019 and the appellant assumed his charge on 21.07.2019. Copies of the order dated 20.07.2019 and charge report are attached as annexureC&D.
- 4- That although the appellant was re-instated in to service and the intervening period had been treated leave without pay but seniority and due promotion w-e-f 02.01.2015 to the post of PSHT had not been given irrespective of the fact that junior to the appellant had been promoted to post of SPST and then PSHT (BPS-15) vide order dated 02.01.2015, hence keeping section 8 and section 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 and Rule 17 of the Khyber Pakhtunkhwa (APT) Rules, 1989 the entitled for his due seniority and promotion. Copy of the working paper and order dated 02.01.2015 are attached as annexureE&F.
- 5- That similarly the pay was also revised but it had not been properly fixed/ protected keeping in view of the length of service. Copies of the service book and pay slip are attached as annexureG&H.
- 6- That appellant approached the concerned officer time and again but fruitless, hence feeling aggrieved and having no other remedy preferred departmental appeal but the same has not been decided within the statutory period of ninety days. Copy of the departmental appeal is attached as annexureI.
- 7- That having no other remedy but to file the instant service appeal on the following grounds amongst the others.

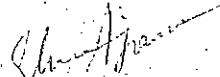
GROUND:

- A- That the impugned inaction of the respondents by not granting anti-dated promotion to the post of SPST and PSHT (BPS-15) w-e-f 02.01.2015 and against the action of the respondents for wrong fixation of pay is against the law, facts, norms of natural justice

and materials on the record, hence not tenable and liable to be set aside.

- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.
- C- That according to section 8 and section 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 and Rule 17 of the Khyber Pakhtunkhwa (APT) Rules, 1989 the appellant is entitled for his due seniority and promotion from the due date at par with his colleague and junior colleagues.
- D- That according to section 17 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 the appellant is entitled for his pay and pay fixation.
- E- That according to Article 38(e) of the constitution of the Islamic Republic of Pakistan, 1973 respondents are bound to reduce disparity in the income of individuals, including persons in various classes of service of Pakistan.
- F- That the appellant seeks permission to advance any other ground and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT

SHER AJAM KHAN

THROUGH:


KAMRAN KHAN

&

WALEED ADNAN

ADVOCATE

HIGH COURT PESHAWAR

AFFIDAVIT

I do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing have been concealed from this Honorable tribunal.


DEPONENT

-4- (A)

OFFICE OF THE DISTRICT EDUCATION OFFICER(M) BANNU

Appointment:-

Mr. Sher Ajam Khan S/O Zahir Shah (Metric Passed) is hereby appointed as an untrained teacher at Rs. 560 per month in BPS-7 against the post of PTC untrained at GPS Barlashtai Tehsil District Bannu from the date of taking over charge.

TERMS AND CONDITION

1. Charge Report of taking over should be submitted to all concerned.
2. No TA/DA is allowed.
3. He is directed to produce a certificate of Medical fitness from the Medical Superintendent D.HQ Hospital Bannu which will be sent with the 1st pay bill.
4. He will be governed by the service rules in force.
5. If he failed to take over charge within 14 days, then his appointment order shall be considered as cancelled.
6. If he wishes to resign, he will give prior notice of one month pay shall be forfeited in favour of government.

Sd/
District Education Officer (M)
Bannu.

Dated Bannu the 5/7/1987

Endst: No 4045-49
/A12-PTC

Copy forwarded to the:-

1. District Accounts Officer Bannu.
2. Sub Divisional Educational Officer Bannu.
3. Head teacher GPS Barlashtai, Bannu.
4. Sher Ajam Khan S/O Zahir Shaah candidate concerned.

// Sd/
District Education Officer (M)
Bannu.
Q

(B) -5-

جاری حساب

کوالیٹی آرڈر نمبر	4-45-80
تاریخ	5-7-84
موضوع	...
...	...
...	...

موضوع: ...

تاریخ: 20-7-84

...

...



**DISTRICT EDUCATION
OFFICE (MALE) BANNU**

Phone No & Fax No 0928-660005 Email: bannuedo@yahoo.com



-6-

OFFICE ORDER.

As per Judgment of the Honourable Court of District & Session Judge judgment on 30-05-2019 in case FIR NO. 20 Dated 28-01-1998 under section 302/324/34 PPC of PS Domel District Bannu. Keeping in view the afore said judgment the accused Mr. Sher Ajam Ex-PST was charged in criminal case under the sections of PPC cited above, the undersigned took the following decisions keeping in view the case history & prevailing policy.

1. The absconder period of the accused/ex-PST w.e.f 28-01-1998 to 05-07-2018 will be treated as leave without pay.
2. The cancellation of BBA (Bail before arrest) on 05-07-2018, which is also the date of arrest by police & as per Section 190 to 192 of CSR, any accused will be entitled for subsistence grant from the date of arrest.
3. The accused Sher Ajam Ex-PTC now honorably acquitted from the false allegation by the court of Additional Session Judge NO.III Bannu is hereby re-instated in service with all back benefits from the date of arrest by police.
4. Drawl if previously made or not should be authenticated through his CNIC.

NOTE.

1. The said teacher is directed to resume charge against his previous post of PST at GPS Khuli Khel with immediate effect.
2. Charge report should be submitted to all concerned.

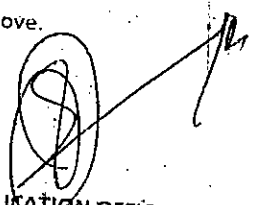
DISTRICT EDUCATION OFFICER
(MALE) BANNU

Dated: 20/07/2019

Endst: No: 10778-81

Copy for information to the:

1. Additional Session Judge -III Bannu with respect to judgment cited above.
2. District Account Officer Bannu.
3. SDEO (Domel) Bannu.
4. SDED (Domel).


DISTRICT EDUCATION OFFICER
(MALE) BANNU

- 7 - (D)

CHARGE REPORT

Certified that Mr. Sher Agam S/O Zahir Shah took over charge as PST against a post of PST at

GPS Quli Khel (Domel)

On dated 21/07/2019 before after noon

Endst:No 10778-81

Dated: 20/07/2019

Sher Agam

Sher Agam PST GPS Qulikhel
Domel

Parooz
~~Headmaster~~
Head Teacher

GPS Quli Khel
Domel

Office of the Sub - Divisional Education Officer (Male) District Bannu
 O/S Myran Gate, Myran Road, Bannu.

Total Post (HTPS/BPS-15)	664	Working paper for Departmental Promotion Committees for the Promotion of SPST(BPS-14) to HTPS (BPS-15)
Working Net posts	658	
Vacant Reserved Posts(HTPS/B-15)	06	
To be promoted by SPSTs	06	
		<i>As per Seniority List for promotion to HTPS (B-15) at this stage/DPC-05,(Copy Attached)</i>
		<i>As per reserved Vacant posts of HTPS (B-15) in last DPC-02</i>
		<i>As per Detail given below of the SPSTs (B-14) extracted from Seniority List.</i>

List of panel for promotion from SPSTs (BPS-14) to PSHTs (BPS-15), Male District Bannu

S.No.	Sen. List: S.No.	Name of Teacher	Father's Name	Place of Posting	BPS	Qualification		Date of Promotion to the present post	Date of Birth	As / G / Service		Date of Apptt./transf./other Dist./Deptt. as Reg./Train;PST at Bannu on	Remarks
						Academic	Professional			as	Date of Apptt.		
1	659	Hamid Ullah Khan	Akbar Khan	GPS Kacha Bacak Ghoriwala	PST 14	FA	PTC	18/09/1969	U/PTC	25/04/1987	14/11/1990	Eligibility (Yes/No)	
2	661	Aslam Pervez	Mushka-e-Alam	GPS Bazar Ahmad Khan	PST 14	FA	PTC;CT;	18/04/1969	U/PTC	20/12/1987	30/03/1992		
3	662	Hazrat Ullah	Sher Ghulam	GPS Dandi Wazir	PST 14	FA	PTC	05/04/1966	U/PTC	20/12/1987	30/04/1992		
4	663	Javed Anjum Qureshi	Najmul Islam	GPS Biland Baist Khel	PST 14	FA	PTC	02/09/1974	PTC	10/04/1993	10/04/1993		
5	664	Muhammad Naeem Shah	Muhammad Ibrahim Shah	GPS Musa Khel Behram	PST 14	FA	PTC	01/04/1969	U/PTC	22/09/1989	29/05/1994		
6	668	Atta Ullah Khan	M. Palil Khan	GPS Kotka Sher Zad	PST 14	FA	PTC	14/01/1971	U/PTC	22/09/1989	25/05/1995		

- 1- It is Certified that all the PSTs (Male) included in the panel for the Promotion to HTPS, BPS-15, post:
- a) Hold the posts on regular basis and none of them is holding the post on adhoc /acting charge basis /contract.
 - b) Have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of HTPS under the Rules.
 - c) None of them is on deputation to any organization under the Federal / Provincial /Autonomous / Semi autonomous /International Organization.
 - d) Neither any disciplinary / departmental proceedings / Anti Corruption / Judicial enquiry is pending against them nor has any penalty been imposed upon any one during the last five (05) years.
 - e) No one is on long leave / Ex-Pakistan Leave.
 - f) Their ACRs Synopsis are free from adverse remarks.
 - g) They are all alive and serving.
 - h) Their appointment orders against PST post & or promotion to the present posts are attached herewith.
 - i) The seniority List of PSTs (HTPS-BPS-15, Sr; PSTs-BPS-14 & PSTs-BPS-12) officials is final, undisputed and not subjudice.
- 2- The Departmental Promotion Committee (DPC) is requested to determine the suitability of the above PSTs for promotion to HTPS (BPS-15)post with immediate effect.

[Signature]
 Sub-Divisional Education Officer
 (Male) Bannu

[Signature]
 District Education Officer
 (Male) Bannu

[Signature]
 Nominee of Director (E&SE)
 Khyber Pakhtunkhwa Peshawar
 (Assistant Director Physical Education
 Khyber Pakhtunkhwa)

DPC-05

Promotion of SPSTs (-14) to HTPS (B-15)

-9-

Office of the District Education Officer
(Male) Bannu

O/S Myran Gate, Miryan Road, Bannu.
Phone No: 0928-660005, Fax No: 0928-660005

Order

Consequent upon the recommendation of the Departmental Promotion Committee (DPC) vide minutes of the meeting dated: 27-11-2014 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No: SO(PE)4-/SSRC/Meeting/2012/Teaching Cadre, Dated, the Peshawar, 13-11-2012, the following Senior Primary School Teachers (Sen;PSTs)-B-14 are hereby promoted to the post of Head Teacher Primary School (HTPS)-B-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below and further posted in the schools noted against each:

S.No	S.L.No	NAME	PRESENT POST AS PST (B14)	PLACE OF POSTING AS SPST (B-15)
1	659	Homid Ullah Khan	GPS Ghoriwala -2	GPS Kot Pusha Ghoriwala
2	661	Aslam Pervaz	GPS Kalka Sher Zad	GPS Zalim Din Jani Khel
3	662	Hazrat Ullah	GPS Aqleem Khan Killa	GPS Dhandi Wazir
4	663	Javed Anjum Qureshi	GPS No: 1 Bannu City	GPS Camp: Ghulam Jan Killa
5	664	Muhammad Noeem Shah	GPS Sikandar Khel Bala	GPS Saleh Khan Fazal Haq Malwana
6	668	Alla Ullah Khan	GPS Bazar Ahmad Khan No:2	GPS Nasir Ullah Jani Khel

Terms & Conditions:

- 1) They would be on probation for a period of one year extendable for another one year.
- 2) They will be governed by such rules and regulations as may be issued from time to time by the government.
- 3) Their service can be terminated at any time in case his performance is found. Unsatisfactory during probationary period in case of misconduct, he shall be preceded under the rules framed from time to time.
- 4) Charge report should be submitted to all concerned.
- 5) Their Inter-Se-Seniority on lower post will remain intact.
- 6) No TA/DA is allowed for joining his duty.
- 7) They will given an under taking to this effect to be recorded in their service book.
- 8) Every teacher is directed to take charge within Three (03) days, failing which his seniority will be affected in future.
- 9) Teachers fail to join the post within limit of time will not be illegible to be in BPS-14 but he will be remain in BPS-12.

DISTRICT EDUCATION OFFICER
(MALE) BANNU

Dated: 02/01/2015

Endst. No: 43-50/DEO (M)

Copy for information and necessary action to:

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Bannu.
3. District Account Officer Bannu.
4. Deputy District Officer (M) Bannu.
5. Sub Div. Education Officer (Male) Bannu.
6. The Head of Institution Concerned Schools.
7. Teacher Concerned for strict Compliance & report.
8. Master file.

DISTRICT EDUCATION OFFICER
(MALE) BANNU

Scanned with CamScanner

Sher Aman Khan -10- (9)

Name and Religion
(تاریخ اور مذہب)

Pakistan | Islam

Birth by Christian era as ascertained
(تاریخ میلاد مسیح کے مطابق)

VIII - Quli Khan, P.O. DOMEL, SIK

Name and residence
(والد کا نام اور رہائش)

Mr. Zahid Shah

Height by measurement
(قد و قامت)

01-01-1965

01-07-1958

Correction made according SSC Certificate

Mark for identification
(پہچان کے نشانات)

NIL

Left hand thumb and finger impressions of (Non-gazetted) officer
(بائیں ہاتھ کی انگوٹھ اور انگلیوں کے نشانات)

Ring Finger
(پونجلی)



Index Finger
(انگلی)



Signature of Government servant
(سرکاری ملازم کے دستخط)

Shah Javed

Name and designation of the Officer, or other Attesting
(تصدیق کنندہ کے نام اور عہدہ)

Handwritten signature and stamp

entire of this page should be renewed or re-attested at least every five years and the signature of the Officer, or other Attesting Officer, should be dated. Finger impressions need not be taken after every 5 years under this rule.

اس صفحہ کے درجہ تمام اہم یا اہم ہونے والے حصوں کو ہر پانچ سال بعد تجدید یا دوبارہ تصدیق کی ضرورت ہے اور اس کے ساتھ ساتھ انگریزی کے دستخطوں کی تاریخ بھی درج کی جائے گی۔ انگوٹھ کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں ہے۔

پانچ سال کے بعد تصدیق کی ضرورت نہیں

1	2	3	4		5		6	7
	Whether substantive or officiating and whether permanent or temporary	If punctuating state— (i) substantive appointment or (ii) whether service annua for pension under rule 3-20 of C. S. R. (Ph.) volume II	Rs.	P.	Rs.	P.	Signature and designation of the head of the office or other Attending Officer in execution of command	Date of appointment
	تاریخی منتقل یا قائم مقام	اگر مابین کے تو کیا دور میں کیے گئے ہیں یا منتقل						
	Tarun						DEO (M) Banmu	30-1-79
	"				560/-	Fixed	DEO (M) Banmu	30-1-79
	"				560/-	Fixed	DEO (M) Banmu	30-1-79
	"				560/-	DM	DEO (M) Banmu	30-1-79
	"				750/-	DM	DEO (M) Banmu	30-1-79
	"				750/-	DM	DEO (M) Banmu	30-1-79
	"				750/-	DM	DEO (M) Banmu	30-1-79
	"				750/-	DM	DEO (M) Banmu	30-1-79

6	7	10	11	12	13	14	15	
Other falling under this pay band	Signature and designation of the head of the office or other Attesting Officer in attestation of columns 7 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debit to an other Government	Signature of the head of the office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
						Period to which Government is debit		
	Signature of Head of Office	30/11/1984	NO. 2084	Signature of Head of Office		Appointed on 10/12/1981 Post @ P. 560/-pm FWD in BPS-7 Kale DEO (M) Punjab Emser A. No. 4545-29 dated 05/07/1981	Signature of Head of Office	Reference to any recorded punishment or censure, or reward or praised of the Government servant
	Signature of Head of Office	30/11/1985		Signature of Head of Office			Signature of Head of Office	
	Signature of Head of Office	30/11/1986		Signature of Head of Office		Passed SSC Exam from PASE Punjab under Roll No. 92941 during the session 1985 marks obtained 923/- in 2nd Division	Signature of Head of Office	
	Signature of Head of Office	30/11/1987	NIC 2087	Signature of Head of Office			Signature of Head of Office	
	Signature of Head of Office	30/11/1988		Signature of Head of Office		Justice verified from 5/7/1984 to 30/11/1988 from office record	Signature of Head of Office	

اس جدول کے نشانات کے لئے ہر پانچ سال کے بعد تھریں کی ضرورت نہیں

2	3	4	5		6	7	8
Whether substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C. S. R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating		Other falling under the term "Pay"	Date of appointment	Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8
		13	K. P.	K. P.			
				750/-		12/1988	
				750/-		31/89	
				750/-		12/89	
				781/-		12/89	
				812/-		12/1991	
				1215/-		12/1991	
				1275/-		12/1991	
				1325/-		12/1991	

Rev B-7 (1095-60-1995)

Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8

12/1988
 31/89
 12/89
 12/89
 12/1991
 12/1991
 12/1991
 12/1991

7 Date of appointment تاریخ تقرری	9 Signature and designation of the head of the office or other Attesting Officer in attestation of columns 1 to 8 دستخط سرکار مہجاز	10 Date of termination of appointment تاریخ انقطاع ملازمت	11 Reason of termination (such as promotion, transfer, dismissal etc.) وجوہات انقطاع ملازمت ترقی یا تسوی یا توطوری	12 Signature of the Head of the office or other Attesting Officer دستخط سرکار مہجاز	13 Leave فصلی		14 Signature of the head of the office or other Attesting Officer دستخط سرکار مہجاز	15 Period to which Government is debitable عرصہ
					Nature and duration of leave taken رضعت کی زیادت و میعاد	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government Government to which debitable		
12/1988	Head of Office SDE Mehar	31/05/89	Promoted to PTC SDE	SDE Mehar	Under Government 1988			
31/89	Head of Office SDE Mehar	30/11/89	Promoted to PTC SDE	SDE Mehar	Under Government 1989			
12/89	Head of Office SDE Mehar	30/11/92	Promoted to PTC SDE	SDE Mehar	Under Government 1989			
12/1990	Head of Office SDE Mehar	30/06/1991	Scale Revised SDE	SDE Mehar	Under Government 1990			
12/1991	Head of Office SDE Mehar	30/11/1991	Scale Revised SDE	SDE Mehar	Under Government 1991			
12/1991	Head of Office SDE Mehar	30/11/92	Scale Revised SDE	SDE Mehar	Under Government 1991			
12/1991	Head of Office SDE Mehar	30/11/93	Scale Revised SDE	SDE Mehar	Under Government 1991			

یہ سہ ماہی کے احکامات کی ضرورت ہیں

Whether substantive or officiating and whether permanent or temporary دائمی یا موقت	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C. S. R. (Pb.) اگر عارضی ہے تو وہ کیا ہے پسین کا مستحق ہے	Pay to substantive post تعمیراتی پوزیشن عارضی ملازمت		Additional pay for officiating زائد تعمیراتی بطور قائم مقام		Other falling under the term "Pay" دیگر ایسی چیزیں جو "پے" کے تحت آتی ہیں	Date of appointment تعمیراتی کی تاریخ	Signature and designation of the head of the office or other Attending Officer in attestation of columns 1 to 8 دستخط اور عہدہ
		Rs.	P.	Rs.	P.			
				1595/-			1-12-1994	[Signature]
				1885/-			1-7-1994	[Signature]
				1966/-			1-12-1994	[Signature]
				2047/-			1-12-1994	[Signature]
				2128/-			1-12-1994	[Signature]
				2209/-			1-12-1994	[Signature]

B.P. No. 7 (480-81-2695)

9 Date of appointment	10 Signature and designation of the head of the office or other Attesting Officer in attestation of column 8 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 Signature of the head of the office or other Attesting Officer	16 Reference to any recorded punishment or censure or reward or praised of the Government servant
					Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		
1-12-1992	Shamir SDEO (M) Bannu	30-11-1994	Scale Revision	Shamir SDEO (M) Bannu	30-11-1987	Service verified from 1/12/1987 to 30-11-1988 from office record		
1-12-1994	Shamir SDEO (M) Bannu	31-11-94	Grant	Shamir SDEO (M) Bannu		Service verified from 1/12/1988 to 30-11-1990 from office record		
1-12-1994	Shamir SDEO (M) Bannu	31-11-95	"	Shamir SDEO (M) Bannu		Service verified from 1/12/1988 to 30-11-1990 from office record		
1-12-1995	Shamir SDEO (M) Bannu	30-11-96	"	Shamir SDEO (M) Bannu		Service verified from 1/12/1990 to 30-11-1992 from office record		
1-12-1996	Shamir SDEO (M) Bannu	30-11-97	"	Shamir SDEO (M) Bannu		Service verified from 1/12/1992 to 30-11-1994 from office record		
1-12-1999	Shamir SDEO (M) Bannu			Halim SDEO (M) Bannu				

اس کی کاپیاں ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

- 17 -

1. Name (نام) SHER AJAM ICHHA
2. Nationality and Religion پاکستانی اور مسلمان
(قومیت اور مذہب)
3. Residence پنجاب ڈاکٹر ڈوسل ضلع خوں
(مستقل رہائش)
4. Father's name and residence ZAHIR SHAH
(والد کا نام اور پتہ)
5. Date of birth by christian era as nearly as can be ascertained 01-01-1965
(تاریخ پیدائش مطابق مسیحی)
6. Exact height by measurement 5-6
(قد و قامت)
7. Personal mark of identification Nil
(نشان شناخت)

Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)
(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Index Finger Ring Finger Middle Finger
(انگشت بیانیہ) (چھنگلیا کے ساتھ کی انگلی) (انگشت بیانیہ)

Index Finger Thumb
(انگشت بیانیہ) (انگشت)

Sher Ajam
Signature of Govt. Servant
(سرکاری ملازم کے دستخط)

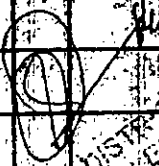
[Signature]
DISTRICT OFFICER
(M) E.S. Education
Bannu

Signature and designation of the Head of the Office or other Attesting officer
(تصدیق کنندہ افسر کے دستخط اور مہر)

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

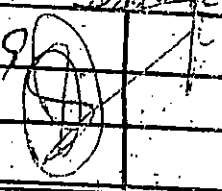
اس صفحے کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

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 rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Grade	and position of the officer at the date of appointment
درجہ ملازمت	عارضی مستقل یا یا قائم مقام	اگر عارضی ہے تو رول کے مطابق پیش کش ہے؟	تختواہ بطور عارضی ملازمت	زائد تختواہ بطور قائم مقام	سوائے تختواہ دیگر الاؤنس	تاریخ تقرری		
			Rs. Ps.	Rs. Ps.				
	فصلی							
	Pct					1-12-98		
	Pct					1-12-1998		
						1-12-2000		
						1-12-2001		
	Pct					1-12-2001		
						1-12-2002		
						1-12-2003		
						1-12-2004		
	Pct					1-7-2005		
						1-12-2005		
						1-12-2006		


 DISTRICT OFFICER
 DISTRICT OFFICE

9 Signature of the Head of the Government or other officer in charge of the establishment of the Government	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal)	12 Signature of the head of the office or other Attesting officer	13 19- Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitable to another Government پارہ ایک کی رخصت کے لئے اوسط فراڈ کا تین Period عرصہ Government to which debitable گورنمنٹ کے نام		14 Signature of the Head of the office or other attesting Officer	15 Reference to any recorded punishment or censure, reward or praised of the Government servants: سزا یا جزا غیر مناسب کارکردگی کا ریکارڈ
	تاریخ انتقال ملازمت	وجوہات انتقال ملازمت سزا یا جزا غیر مناسب کارکردگی کا ریکارڈ	رخصت کی نوٹیت امتیاز	<p>Reinstated in Service from the date of arrest with back benefits 5-7-2018 to the date of Honorable District & Session Judge Bannu decision Announced on 30-6-2019 and Honorable acquitted from the case FIR No. 20 dated 28-1-1999 under Section 302/324 PPC Ps. Dawud Bannu and the absconder period of the official w.e.f 28-01-1999 to 5-7-2018 treated as a leave without pay and the arrest period w.e.f 5-7-2018 to date is treated as a back benefit vide DEO (M) Bannu Encl. NO: 10778-81 Dated 20-07-2019</p>		رخصت کی نوٹیت امتیاز	

20-07-2019



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 rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature and Seal of the Government officer in station of an 1 to 8
	عارضی مستقل یا یا قائم مقام	آر عارضی ہے تو دولت کے مطابق پیش کیا سنتی ہے؟	تخواہ بطور عارضی ملازمت	Rs.	Ps.	زائد تخواہ بطور قائم مقام	ماسوائے تخواہ دیگر الادیس	تاریخ تقرری	
PST									
B-12	Per m	1-12-2013				Rs. 9500/-			
		1-12-2014				Rs. 9500/-			
		1-7-2015				Rs. 12305/-			
		1-12-2015				Rs. 12305/-			
		1-7-2016				Rs. 15140/-			
		1-12-2016				Rs. 15140/-			
		1-7-2017				Rs. 18120/-			
		1-12-2017				Rs. 18120/-			
		1-07-2018				Rs. 18120/-			
		1-12-2018				Rs. 19080/-			
						Rs. 18120/-			

9.0 V
28-1-1998
2014
6-7-2018
to 5-7-2018

(Signature)
18/12/18

TRK
D
add
712

9		10	11	12	13		14	15		
Signature of Government Servant	Name and Designation of the Head of the Office or other Attesting Officer	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitiable to another Government		Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reprimand or praised of the Government servants	
						Period	Government to which debitiable			
		تاریخ انتقال ملازمت	وجوہات انتقال ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ایکس رخصت کے سے اور ساتھ آٹھ تین	Period عرصہ	Government to which debitiable گورنمنٹ دہلی	دستخط افسر مجاز	سزایا جزا شیرمناسب کارکردگی کا ریکارڈ
						Service up to net 1-12-1997 To 27-11-1997 from A Roll and other office as per				
						Service up to net 5-7-2018 To 30-11-2018 from A/D roll and other office as per				
			93	27-11-1997						
			Regular pay							
			w.e.f 5-7-2018							
			To 31-7-2019							
			365 7/19							

9 Name and designation of Head of the office or other person in charge of the office	10 Date of termination or appointment	11 Reason of termination (such as Promotion, transfer, Dismissal)	12 Signature of the head of the office or other Attesting Officer	13 Nature and duration of leave taken	14 Signature of the Head of the office or other attesting officer	15 Reference to any recorded punishment or censure, reward, or praise of the Government servants
<p>Signature of Government servant</p> <p>افسر محترم</p>	<p>تاریخ</p> <p>انقطاع</p> <p>ملازمت</p>	<p>وجوبت</p> <p>انتقال ملازمت</p> <p>ترقی کا ذریعہ</p> <p>یاہ طریق</p>	<p>دستخط</p> <p>افسر مجاز</p>	<p>Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government</p> <p>چار ماہ تک کی رخصت کے لئے اوسط خواہ کا مین</p> <p>Period</p> <p>۶ مہ</p> <p>Government to which debitable</p> <p>۱۰۰۰۰۰۰۰</p>	<p>دستخط</p> <p>افسر مجاز</p>	<p>Reference to any recorded punishment or censure, reward, or praise of the Government servants</p> <p>سزا یا جزا</p> <p>غیر مناسب</p> <p>کارکردگی کا ریکارڈ</p>
				<p>Service verified</p> <p>1-12-2018 to 30-11-2019</p> <p>From A.P. Roll and other office record</p>		
		<p>S.D.E.O. Domel Bannu</p> <p>30-11-2021</p>			<p>S.D.E.O. Domel Bannu</p>	
		<p>30-11-2022</p>		<p>Drans Rs. 37440/-</p> <p>on A.P. pay + G.M.O. and C.F. 21-01-2022</p>		
		<p>30-11-2022</p>				
		<p>30-11-2022</p>				
		<p>30-11-2022</p>				
		<p>30-11-2022</p>				
		<p>30-11-2022</p>				

8	9	10	11	12	13	14	15
Signature and position of Head of the office or other attesting officer	Date of termination or appointment	Reason of termination (such as Promotion, transfer, Dismissal)	Signature of the head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other attesting officer	Reference to any recorded punishment or censure, reward, or praise of the Government servants
ذمہ دار کے دستخط	تاریخ انقطاع ملازمت	دبوات، انتقال، ترقی چور، یا عفری	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ کی رخصت کے لئے اوسط تنخواہ کا تین Period Government to which debitable	دستخط افسر مجاز	سزا یا تازی یا غیر مناسب کارکردگی کا ریکارڈ
					Service identified w.e.f		
					1.12.2021 To 30.11.2022		
					From the A/S's office record		

Sd/-
Bennu

-26-

11A

Bannu

SN: 19348

P. Sec: 001 Month: July 2023
BU6073 - Government Primary Schools
GOVERNMENT PRIMARY SCHOOL

Pers #: 00917255 Buckle:
Name: SHER AZAM KHAN
PRIMARY SCHOOL TEACHER
CNIC No. 1110144594325
GPF Interest Applied
12 Active Temporary

NTN:
GPF #: EDU BU 5282
Old #:

PAYS AND ALLOWANCES:

0001-Basic Pay		32,640.00
1001-House Rent Allowance 45%		2,940.00
1210-Convey Allowance 2005		2,856.00
1300-Medical Allowance		1,500.00
2316-Teaching Allowance 2021		2,664.00
2341-Dispr. Red All 15% 2022KP		3,150.00
2347-Adhoc Rel Al 15% 22(PS17)		3,150.00
2378-Adhoc Relief All 2023 35%		11,424.00
Gross Pay and Allowances		60,324.00

DEDUCTIONS:

IT Payable	2,129.38	Deducted	194.00	TAX: (3609)	194.00
GPF Balance	648,608.00			Subrc:	3,300.00
3501-Benevolent Fund					1,200.00
3534-R. Ben & Death Comp Fresh					600.00
3990-Emp. Edu. Fund KPK					135.00

Total Deductions

5,429.00
54,895.00

D.O.B
01.01.1965
39 Years 02 Months 028 Days

LFP Quota:
HABIB BANK LIMITED AZIM KALA ROAD, BANNU
19917900259903

اکھو جی۔ ڈیپارٹمنٹ آف سٹریٹس
-27-

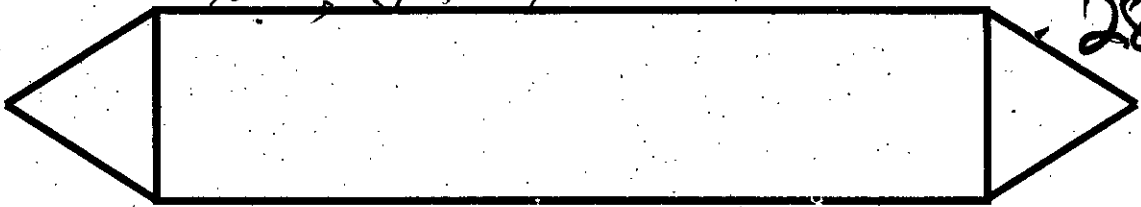
کیونکہ: مٹی نہ اسل براؤڈ ویج ٹریڈنگ سٹیشن از حرمہ 2015/1/2 کو
سٹیٹنگ و دیگر مٹریل

صافی

گورنمنٹ لٹرائس ہے کہ سٹیشن مجمعہ نہ اسل ٹور 2015 آ۔ 2015
سے 1984/7/7 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
تاریخ 1984/7/7 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
سٹیٹنگ لٹرائس لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
پہلے لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
سے 1984/7/7 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
سٹیٹنگ لٹرائس لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
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2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
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2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا

سٹیٹنگ لٹرائس لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
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2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا

آئی اے ایف
2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا
2015/1/2 کو لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا لپوٹا



Appellant 2 منجانب

بنام گورنمنٹ
سید عجم

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لیے کاڈان خان انڈولڈن انڈولڈن

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے کے تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے
سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔
کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Ataphad & ...
20

ماہ

المرقوم

العبد دگ واہ العبد

کے لئے منظور ہے۔

سید

مقام