

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal No. 626/2016

Date of Institution ... 13.06.2016

Date of Decision ... 27.09.2017

Sabir Khan, Pump Driver, Office of the Executive Engineer, Peshawar Canals
Division, Peshawar. ... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Irrigation
Department, Khyber Pakhtunkhwa, Peshawar and 4 others.
(Respondents)

MR. YASIR SALEEM,
Advocate

For appellant.

MR. MUHAMMAD JAN,
Deputy District Attorney

...

For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. AHMAD HASSAN

...

...

CHAIRMAN
MEMBERJUDGMENT

NIAZ MUIHAMMAD KHAN, CHAIRMAN.- Arguments of the
learned counsel for the parties heard and record perused.

FACTS

2. The appellant wants to correct his date of birth in his service record from
01.07.1956 to 01.07.1966.

ARGUMENTS

3. The learned counsel for the appellant argued that the appellant was
appointed in the year, 1991 and his date of birth was incorrectly mentioned in his

service book as 01.07.1956 despite the fact that his date of birth as 01.07.1966 has been mentioned in school leaving certificate and also medical certificate which was issued at the time of joining of service. He also referred to Birth Certificate which also bears the date of birth as 01.07.1966. The learned counsel for the appellant argued that when the appellant came to know about the entry of his wrong date of birth, he submitted his departmental appeal on 15.08.2013 which was not responded to and there-after the appellant filed a Civil Suit on 02.12.2014 which was dismissed for want of jurisdiction. The learned counsel for the appellant also referred to another certificate of age assessment by Medical Superintendent, Police and Services Hospital, Peshawar dated 5.11.2014 in support of contention of the appellant.


4. On the other hand, the learned Deputy District Attorney argued that the present appeal is hopelessly time barred. That how it can be believed that the appellant who was inducted in service in the year, 1991 did not know of wrong entry of his date of birth in service record till 2013. He further argued that under GFR-116 the appellant could have corrected the date of birth within 2 years of his induction in service. The learned DDA relied upon two judgments reported as 2004 PLC (C.S) 1162 and 2013-SCMR-759.

CONCLUSION.

5. Though the appellant has not written in his departmental appeal dated 15.08.2013 that when did he come to know about his wrong date of birth. But if it is presumed that he came to know about his wrong date of birth on 15.08.2013, then he should have come to this Tribunal within 120 days from 15.08.2013 but instead he approached the Civil Courts on 02.12.2014. The said suit of the appellant was dismissed on 25.05.2016. The period of limitation if reckoned from 15.08.2013, the present appeal is time barred and the period between 15.08.2013 to 02.12.2014 (the date of filing of suit) has not been

explained by the learned counsel for the appellant and secondly the time spent before the wrong forum cannot be condoned as held by the august Supreme Court of Pakistan in its judgment entitled "*Khushi Muhammad etc. Vs. Mst. Fazl Bibi etc.*" reported as 2016-SCMR-872 in which it has been finally held that time spent in wrong forum on the basis of wrong advice or even on the principle of *actus curiae neminem gravabit* cannot be condoned. The present case is therefore, hopelessly time barred. No condonation can be granted. On merits too the civil servant cannot correct his date of birth after 2 years of joining of service as argued by the learned DDA in view of GFR-116 and supported by the judgment relied upon by him. One more judgment in this regard is 1998-SCMR-801. It is proved that school leaving certificate was issued on 17.6.2011 then how it could be made part of service record in the year, 1991. There is no date on birth certificate relied upon by the learned counsel for the appellant. The date of birth in CNIC is also 1956. How can the appellant now say that he came to know about his wrong date of birth in 2013. So far as the medical certificate dated 26.11.2014 is concerned it is mainly based on physical examination and bodily development but does not mention that on the basis of which science, the doctor opined the exact age of the appellant as 48/49 years as ossification of bones gives result maximum upto 25 years.

6. Consequent upon the above discussion, this appeal is dismissed. File be consigned to the record room.



(AHMAD HASSAN)
MEMBER




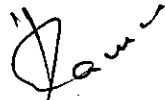
(NIAZ MUHAMMAD KHAN)
CHAIRMAN

ANNOUNCED
27.09.2017

03.07.2017

Agent to counsel for the appellant and Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Agent to counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 27.09.2017 before D.B.



(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

27.09.2017

Appellant alongwith counsel and Mr. Muhammad Jan, DDA for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, this appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.


Member


Chairman

ANNOUNCED
27.09.2017

16.02.2017

Appellant in person present and Addl: AG for respondents present. Written reply on behalf of respondent No. 5 is remaining. Last opportunity granted. To come up for written reply/comments on 27.03.2017 before S.B.


(AHMAD HASSAN)
MEMBER


27.03.2017

Counsel for the appellant and Addl: AG for the respondents present. Written reply on behalf of respondent No. 5 is remaining. Another last opportunity granted. Notice be issued to respondent No. 5 for submission of written reply/comments on 26.04.2017 before S.B.


(AHMAD HASSAN)
MEMBER

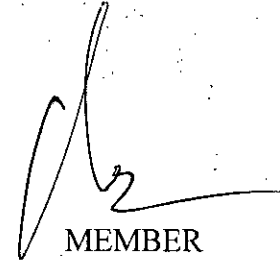
26.04.2017

Clerk to counsel for the appellant and Addl. AG for the respondents present. Written reply on behalf of respondents No. 1 to 4 already submitted. Counsel for the appellant submitted an application for deletion of respondent No. 5 ^{from} the panel of the respondents. Application is allowed. The Reader of the court is directed to necessary entry be made in the panel of respondents. To come up for rejoinder and arguments on 03.07.2017 before D.B.


(Ahmad Hassan)
Member

01.11.2016

Clerk to counsel for the appellant and Mr. Ziaullah, GP for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 12.12.2016 before S.B.



MEMBER

13.12.2016

Since 12th December, 2016 has been declared as public holiday on account of 12th Rabi-ul-Awal, therefore, case to come up for the same on 18.01.2017 before S.B.



Reader

18.01.2017

Clerk to counsel for the appellant and Mr. Hameed ur Rehman, AD (Lit) alongwith Addl. AG for respondents present. Written reply submitted by respondents No. 1, 2 and 4. Remaining respondents not submitted reply. Requested for adjournment. To come up for written reply/comments on 16.02.2017 before S.B.



(ASHFAQUE TAJ)
MEMBER

15.06.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Pump Driver in the Irrigation Department and that his correct date of birth is of the year, 1966 while the same erroneously recorded as 01.07.1956 where-against appellant preferred departmental appeal on 15.08.2013 followed by civil suit which was dismissed for want of jurisdiction on 25.5.2016 and hence the instant service appeal on 13.06.2016.

That according to medical certificate of the appellant maintained by the department age of the appellant and his date of birth could be conducted to be that of 1966.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 24.08.2016 before S.B. Notice of stay application shall also be issued to the respondents for the date fixed.

Appellant Deposited
Security & Process Fee


Chairman

24.08.2016

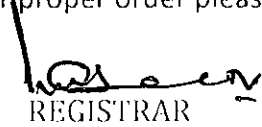

Appellant in person and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 1.11.2016 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 626 /2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13/06/2016 14-6-16	<p>The appeal of Mr. Sabir Khan presented today by Mr. Sajid Amin Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>15-6-16</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Appeal No. 626/2016

Sabir Khan, Pump Driver, Office of the Executive Engineer,
Peshawar Canals Division Peshawar.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Irrigation Department Khyber Pakhtunkhwa, Peshawar and
others.

(Respondent)


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Appellant

Through


IJAZ ANWAR
Advocate Peshawar

&

SAJID AMIN
Advocate, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 629

Dated 13-6-2016

Appeal No. 626/2016

Sabir Khan, Pump Driver, Office of the Executive Engineer,
Peshawar Canals Division Peshawar.

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Irrigation Department Khyber Pakhtunkhwa, Peshawar.
- ✓2. Chief Engineer (South) Irrigation Department Khyber Pakhtunkhwa, Peshawar.
- ✓3. Executive Engineer, Peshawar Canals Division Peshawar.
4. Sub Divisional Officer, Kabul River Canal Sub Division, Peshawar.
5. Director General National Database and Registration Authority, Phase-V, Hayatabad, Peshawar.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act Service Tribunal Act, 1974, for correction of the date of birth of the appellant as 01.07.1966, wrongly entered as 01.07.1956 in the service record of the appellant, against which the departmental appeal of the appellant has not been responded till date.

Prayer in Appeal: -

On acceptance of this appeal the Respondents may please be directed to correct the date of birth of the appellant as 01.07.1966 instead of 01.07.1956 in his service record or any remedy deem just and proper may also be allowed in favour of the appellant.

Filed to-day

Registrar

13/6/16.

*Deleted
vide order dated
26.4.17*

Respectfully Submitted:

1. That the appellant was initially appointed as Tube Well Operator in Irrigation department vide order dated 05.06.1991. Ever since his appointment the appellant is performing his duties as assigned with zeal and devotion. **(Copy of the appointment order dated 05.06.1991 is attached as Annexure A)**
2. That it is pertinent to mention here that the correct date of birth of the appellant as per his School Leaving Certificate is 01.07.1966, similarly when the appellant was medically examined after his appointment in the year 1991, his age appeared at that time as 24/25 years according to which his date of birth was 1966. **(Copies of the school leaving certificate, medical certificate and birth certificates are attached as Annexure B, C & D)**
3. That despite the fact that as per the medical certificate and school leaving certificate, the correct date of birth of the appellant is 1966 (i.e 01.07.1966), however in the service record his date of birth was wrongly recorded as 01.07.1966. **(Copy of the service book is attached as Annexure E).**
4. That the appellant when came to know about the wrong entry of his date of birth in the service record in the year 2013, he duly submitted an appeal for the correction of his date of birth, his case was duly forwarded to the Director General NADRA vide letter dated 17.03.2014. **(Copies of the departmental appeal and letter dated 17.03.2014 are attached as Annexure F & G)**
5. That it is pertinent to mention here that the appellant was referred to the Services Hospital, Peshawar for age assessment, accordingly after his physical examination, he was issued the age assessment certificate dated 28.11.2014, according to which his age appeared to be 48-49 years. **(Copy of the certificate dated 28.11.2014, is attached as Annexure H)**
6. That the appellant time and again approached the respondents for taking any action upon his departmental appeal, but they remained reluctant. Thereafter the appellant filed a civil suit in the Civil Court Peshawar. **(Copy of the civil suit is attached as Annexure I)**
7. That the suit remained pending before the learned civil judge-XX, Peshawar. The respondents submitted their written statements and thereafter evidence was also recorded, lastly the suit of the appellant was dismissed for want of jurisdiction vide judgment and order dated 25.05.2016. **(Copies of the written statement and judgment and order dated 25.05.2016, is attached as Annexure J & K)**

8. That the acts and omissions of the respondents for not correcting the date of birth of the appellant in his service record are illegal unlawful against law and fact, hence liable to be set aside inter alia on the following grounds:

GROUNDS OF SERVICE APPEAL:

- A. That the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the law are badly violated.
- B. That the appellant duly produced his school leaving certificate at the time of appointment, however mistakenly, may be due to clerical mistake, the date of birth in his service book was recorded as 01.07.1956 instead of 01.07.1966 thus done great prejudice to the appellant.
- C. That the Superior Court has also held that the date of birth as recorded in the school leaving certificate is to be considered authentic as compared to NIC or medical certificate.
- D. That even at the time of his appointment in the year 1991, when the appellant was medically examined, his age appeared to be 24/25 years which means that his date of birth even according to the medical certificate was 1966, thus is beyond understanding that on what basis the respondents recorded the date of birth of the appellant as 1956.
- E. That it has nowhere been denied that the appellant's date of birth in his Primary School Record / School leaving Certificate is 01.07.1966. similarly it is also not disputed that at the time of his medical examination in the year 1991, appellant age was shown to be 25/25 years i.e his date of birth was 1956, thus it poses a big question mark as to why entry was wrongly made in the service record of the appellant.
- F. That it is settled by now by the Superior Courts, that the entries in record regarding date of birth of a Civil Servant in the School Record has to be admitted as Correct unless and until it is rebutted through unimpeachable evidence. No such rebuttal does exist in the matter in hand.



- G. That recording date of birth in the service book/maintaining the service book was not the duty of the appellant, therefore he cannot be made to suffer for any wrong/mistake done by others, since the appellant correctly provided his date of birth and also produced medical certificate, thus the concerned officials was required to correctly mentioned the date of birth of the appellant in his service record.
- H. That in case the date of birth of the appellant has not corrected according to his school certificate, it would cause great un-justice to him and he may be retired prematurely.
- I. That the appellant seeks permission of this Honorable Tribunal to rely on additional grounds at the hearing of the appeal.

It is, therefore, humbly prayed that on acceptance of this appeal the respondents may kindly be directed to correct the date of birth of the appellant as 01.07.1966 instead of 01.07.1956 in his service record or any remedy deem just and proper may also be allowed in favour of the appellant.


Appellant

Through


IJAZ ANWAR
Advocate Peshawar.

&


SAJID AMIN
Advocate Peshawar.

**BEFORE THE KHYBER PAKHTUNKWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. _____/2016

Sabir Khan, Pump Driver, Office of the Executive Engineer,
Peshawar Canals Division Peshawar.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Irrigation Department Khyber Pakhtunkhwa, Peshawar and
others.

(Respondent)

**Application for restraining the respondents
from taking any action detrimental to the
service of the petitioner and for
maintaining status quo and allowed the
applicant to continue in service till the
decision of the above noted Appeal.**

Respectfully Submitted:

1. That the appellant has filed today the above noted appeal in this Honourable Tribunal in which no date of hearing has been fixed so far.
2. That the facts and ground mentioned in the accompanied appeal may be read as integral part of this application.
3. That the applicant has got a good prima facie case and there is likelihood of it success.
4. That the applicant would be exposed to great hard ship and inconvenience in case status is not granted as his date of birth is wrongly entered as 01.07.1956, according to which the


appellant would stand retired on 30.06.2016, while correct date of birth of the appellant is 1.07.1966.


5. That it will also serve the interest of justice if this Honorable Court restrains the respondents from issuing any order detrimental to the service career of the appellant and orders status quo till the final decision of the appeal.

It is, therefore, prayed that on acceptance of this application the respondents may please be restrained from taking any action detrimental to the service of the applicant and status quo may kindly be maintained and the appellant may be allowed to continue till the decision of the above noted Appeal.


Applicant

Through


IJAZ ANWAR
Advocate, Peshawar
&


SAJID AMIN
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____/2016

Sabir Khan, Pump Driver, Office of the Executive Engineer,
Peshawar Canals Division Peshawar.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Irrigation Department Khyber Pakhtunkhwa, Peshawar and
others.

(Respondent)

APPLICATION FOR CONDONATION OF DELAY,
IF ANY IN FILING THE TITLED APPEAL

Respectfully submitted:

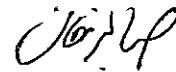
1. That the appellant has today filed the accompanied appeal before this honorable tribunal in which no date of hearing is fixed so far.
2. That the applicant prays for the condonation of delay if any in filing the instant appeal inter alia on the following grounds:-

GROUND OF APPLICATION

- A. That the appellant when came to know about the wrong entry of his date of birth in his service record, he started agitating the matter before the departmental authorities, the appellant submitted his departmental appeal. Thereafter he do to a wrong advise filed a civil suit in the civil court, but the suit was dismissed being without jurisdiction vide order dated 25.05.2016. thereafter the instant appeal is filed.
- B. That since the applicant diligently pursued his case and never remained negligent, thus his case deserves to be decided on merits and the delay if any should be condoned. In this respect SCMR 1990 Page 1 is worth perusal.

- C. That valuable rights of the appellant are involved in the instant case, moreover the appellant throughout agitated the matter firstly before the department and then bonafidely before the Civil Court, hence the delay if any in filing the instant case deserves to be condoned.
- D. That the delay if any in filing the instant appeal was not willful and deliberate hence deserves to be condoned.
- E. That it has been the consistent view of the Superior Courts that causes should be decided on merit rather than technicalities including limitation. The same is reported in 2004 PLC (CS) 1014, 2003 PLC (CS) 769.

It is therefore humbly prayed that on acceptance of this application the delay if any in filing the instant appeal may please be condoned.



Applicant

Through



IJAZ ANWAR
Advocate Peshawar

&



SAJID AMIN
Advocate, Peshawar

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

Appeal No. _____/2016

Sabir Khan, Pump Driver, Peshawar Kenal Division Peshawar.

.....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Irrigation
Department Khyber Pakhtunkhwa and others.

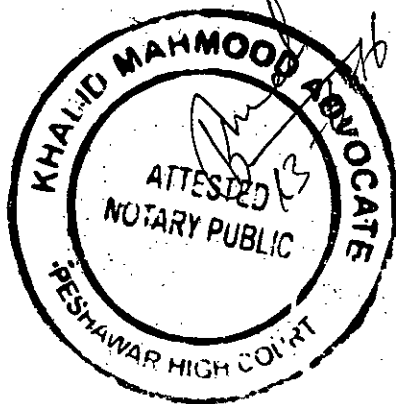
.....Respondents

AFFIDAVIT

I, Sabir Khan, Pump Driver, Peshawar Kenal Division Peshawar, do
hereby solemnly affirm and declare on oath that the contents of the
above noted appeal are true and correct to the best of my knowledge
and belief, and nothing has been kept back or concealed from this
Honourable Tribunal.

Handwritten signature

DEPONENT



No. 1763
To:

133-E, Peshawar the 5/6/1991.
Mr. Sibir Kher / O
Mohammed Umar South Waziristan Agency.

ANNEX A
10

SUBJECT: / APPOINTMENT OF TUBEWELL OPERATOR (T/W No. PST-7 - Doaba OPERATOR)

You are hereby offered a post of T/well at Rs. 675/- P.M. in the basis pay scale No. 4 i.e. plus usual allowances as admissible under the rules.

Your appointment is purely temporary and can be terminated on 15 days notice on either side without assigning any reasons irrespective of the facts that you are holding a post other than one to which you are originally recruited or on the payment of 15 days salary in lieu of the notice.

You will produce the following:-

1. Domicile certificate.
2. A certificate to the effect that you are not a dismissed Government servant.
3. Health and age certificate.
4. Declaration Form duly signed by you.
5. Educational certificate in case of T/well optr;

You will be governed by such rules and orders that may be issued from time to time for such category of Govt servants to which you belong. Your services would be terminated without assigning any reasons if you are found guilty of misconducts or breach of service rules.

This offer is subject to the conditions that you fulfill necessary service entry requirements and you are not over/underage.

If you accept the offer on the above conditions you should report for duty to the S.D.O. Tubewells Irrigation Sub-Division Peshawar and produce all the above documents to him for further necessary action.

This offer will be considered as cancelled if no reply is received within 10 days from the receipt of this offer.

This offer issued with the approval of Departmental selection committee.

Executive Engineer
Tubewells Irr: Divn: Peshawar
Copy forwarded to the following:-

- 1/ A.G.N.W.F.P. Peshawar for information.
- 2/ S.D.O. T/wells Irrigation Sub-Division P for information and necessary action. Original copy of ~~understanding~~ given by land owner is returned for placing of record.
- 3/ O.A. (local).
- 5/ C-II (local).

Executive Engineer
Tubewells Irr: Divn: Peshawar

DLG
122

Handwritten signature and stamp area.

منظور شدہ سرکاری منظور شدہ مندرجہ شدہ
 قلع ساہیوال و وزیرستان

17/6/2011

عمل درست 83 سکول لکھا

ANNEXURE B

مدرسہ چھوڑنے کا سرٹیفکیٹ

(11)

نام طالب علم: صاحب خان
 تاریخ پیدائش: 1/7/1976
 نمبر رجسٹر داخلہ: 1350
 تصدیق کیا جاتا ہے کہ صاحب خان ولد محمد عمر نے جو اس مدرسے میں تاریخ 19/6/2011 تک پڑھتا رہا اور اس کے ذمہ واجب الادا تھیں اور کسی ہیں اور اسے تاریخ مندرجہ بالا پر اپنا نام خارج کرنے کی اجازت دی گئی یہ جماعت حصہ میں پڑھتا تھا اور ان طلبہ کی صورت میں جو مدرسے کے کسی حصہ کی مقررہ پڑھائی کے اختتام پر چھوڑیں

منسٹریں جس میں طالب علم شامل ہوا ان طلبہ کی صورت میں جو مدرسے کے کسی حصہ کی مقررہ پڑھائی کے اختتام پر چھوڑیں

جو اس مدرسے میں شامل ہوا اس کا امتحان کرتی دینے کے لئے جو اسے دی گئی جس کا وعدہ کیا گیا

تصدیق کیا جاتا ہے کہ مندرجہ ذیل اندراج اس مدرسے کے رجسٹروں اور ان سارٹیفکیٹوں کے مطابق صحیح ہیں جو اس نے ان مدرسوں سے حاصل کئے ہیں۔ جہاں اس اعلیٰ سال میں اس سے پہلے تعلیم پائی ہے۔

نمبر	ادرسہ	داخل ہونے کی تاریخ		خارج ہونے کی تاریخ	سال مدرسہ	حاضر ہونے کی مدت	حاضر ہونے کی مدت	رخصت جو سال مدرسہ میں کی گئی
		سکول میں	جماعت میں					
1	مدرسہ ساہیوال	1976	1976	15	4	16	76	
2	مدرسہ ساہیوال	1976	1976	15	4	16	76	
3	مدرسہ ساہیوال	1976	1976	15	4	16	76	
4	مدرسہ ساہیوال	1976	1976	15	4	16	76	

تاریخ 17/6/2011 صرف سکالر شپ پانے والوں کی صورت میں

قسم سکالر شپ: _____
 کس سال عطا ہو: _____
 کون دیتا ہے: _____

نوٹ: عام طور پر مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے درخواست مدرسے سے طلبہ ہونے کے ایک ماہ کے اندر ہونی چاہئے۔ بصورتِ ضرورت ان طلبہ کے جنہوں نے بڑے سکول کا امتحان دیا ہو ایک ماہ تک بھرنے کی تاریخ سے گننا چاہئے۔ بعد گزرنے ایک ماہ کے مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے موازی آٹھ آنے سے فیس خارج ہوگی۔ اگر مدرسہ چھوڑنے کے سرٹیفکیٹ کم ہو جائے اور نئے سرٹیفکیٹ کے لئے درخواست دی جائے تو نئے سرٹیفکیٹ کیلئے موازی آٹھ آنے کے وقت کے جائیں۔

تصدیق کیا جاتا ہے: _____ ولد _____ طالب علم _____ جماعت _____

مدرسہ: _____ سکول: _____ ضلع: _____ سے مدرسہ چھوڑنے کا سرٹیفکیٹ نمبر _____ جماعت میں داخل ہو گیا ہے۔

ALLIES
 PISO
 TECHNICAL OFFICER SOUTH
 IRRIGATION DEPARTMENT
 KHYBER PAKHTUNKHWA
 PESHAWAR

AJC

Ammed C
12

W.P. Med. Co

GA&PD-SWTP 72

00100-12-7-87

MEDICAL CERTIFICATE.

Name of Official: *Mr. Sabir Khan*
Masud

Address: *Village Madana P.O. + Teh. Lada-*
Dist. D.I. Khan

Date of birth:

Height by measurement: *5-7*

Personal mark of identification: *4 scars above the inner corner of right eye*

Signature of the Official

Signature of head of office

Seal of Office

S. Sabir Khan
EX-EMPT: Tehwall J. D. D. Peshawar

Considered for medical certificate in the office of the Tehwall
D. D. Peshawar on *24/25* year age by
25/26

ATC
[Signature]

A. Ashtak

Medical Superintendent
Services, Peshawar

[Signature]
Surgeon Peshawar

[Handwritten notes]

ANNEX "D"

13



پیدائش سرٹیفکیٹ

BIRTH CERTIFICATE



District SNA ضلع Tchsil Town لدھا تحصیل Village سدھان گاؤں

Gender مرد جنس Name عباس خان نام

ID Card Number (if available) شناختی کارڈ نمبر اگر ہو تو

2 1 7 0 2 - 7 6 6 8 7 6 1 - 7

Place of Birth حویلی درہ پستان ایجنسی جائے پیدائش Date of Birth 01-07-1966 تاریخ پیدائش

Father's Name محمد علی والد کا نام

ID Card Number (if available) شناختی کارڈ کا نمبر (اگر ہو تو)

Blank ID card number field

Mother's Name والدہ کا نام

ID Card Number (if available) شناختی کارڈ نمبر اگر ہو تو

Blank ID card number field

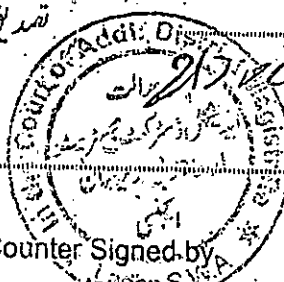
Religion مذہب اسلام Caste محمود - سہیل والد کی قومیت (ذات)

Father's Present Address والد کا موجودہ پتہ

Father's Permeant Address والد کا مستقل پتہ

ہم ماکان اس بات کی تصدیق کرتے ہیں کہ مندرجہ بالا تفصیل ہمارے علم کے مطابق بالکل درست اور صحیح ہے۔ غلط بیانی پر ہم ذمہ دار ہو گے۔

Attested by Tehsildar Political Naib Tehsildar Ladhana, South Waziristan Agency



تصدیق ملک نمبر 013747693

Counter Signed by Assistant Political Agent Ladhana S.M.A. Agency

Attested Deputy District Engineer South Irrigation Department Peshawar

Handwritten signature at the bottom left.

7
The entries in this page should be renewed or re-attested at least every five years and the Signature in
Items 9 and 10 should be dated.

14

1. Name

Sabir Khan

2. Race

Musced. ANNEX "E"

3. Residence

Village Midan P.O. and Tehsil Lada Distt. D.Khan

4. Father's name and residence

Mohammad Umar Village Midan P.O. & Tehsil Lada Distt. D.Khan

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

1-7-1956
(1ST JULY NINETEEN HUNDRED AND FIFTY-SIX)

6. Exact height by measurement

5' 7"

Date

7. Personal marks for identification

A Scar above the eyebrow margin of Right eye below.

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

Sabir Khan

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

Sub Divisional Officer
Tubewells Div: Syc Divn
Bastower

ATC
[Signature]

Signature of Government Servant	Name and position of the office or attesting officer (Nos 1 to 8)	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc).	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period	Government to which debitable		
		Reported arrived for duty on 6/6/91						OPERATOR
		Forenoon						Appointed as Tube well Operator
								1763/33-E dt. 5-6-91
								Sub Divisional Officer Tubewells Irr. Sub Divn Peshawar
								Service for the Period 6/6/91 to 30/11/91
								Pay Revised vide G.O. No. 71/1/91 dt. 1-1-1991
								Executive Engineer, Tubewells Irrigation Division, Peshawar.
								Executive Engineer, Tubewells Irrigation Division Peshawar.
								Transferred to Kohat Irrigation Division Kohat vide Chief Engineer Irrigation Peshawar letter No: 30148-53/1B/A/97-G dt. 12-10-1992
								Executive Engineer, Tubewells Irrigation Division Peshawar dt. 12/10/92
								Service for the Period 1-12-91/1/92 to 30-9-92 (AN) billed from the Estt's Pay Bills Etc.
								Executive Engineer, Tubewells Irrigation Division Peshawar dt. 1/10/92

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, of the (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay of substantive post	5 Additional Pay for officiating	6 Other emolument falling under the same pay	7 Date of appointment	8 Name and Signature of the Officer or other person in charge of the investigation is 10/5
<u>Tubewell operator</u>	officer					10 Feb 1992	T. Gaur D. W. B. P. K.
BPS-4 (1005-43-1650)	Temp/24						
m	m		1043/-	P.M.		12 Feb 1992	
m	m			1091/-	P.M.	12 Feb 1992	

(18)

508

بھنور جناب امیگزیکٹو انجینئر پشاور کینالز ڈویژن پشاور

Annex "F"

جناب عالی:-

گزارش ہے۔ کہ بندہ آپ صاحبان کے زیر سایہ بطور پمپ ڈرائیور خدمات دے رہا ہے۔ بندہ کا قومی شناختی کارڈ میں بندہ کی عمر سال پیدائش غلطی سے 1966 کی بجائے 1956 درج ہے۔ جبکہ بندہ کی اصل سال پیدائش 1966 ہے۔ جو کہ بندہ کی سرورس بک میں موجود ڈاکٹری سرٹیفکیٹ سے واضح ہے۔

لہذا گزارش ہے کہ بندہ کی درخواست کو نادرہ (NADRA) دفتر ارسال کرنے کے احکامات صادر فرما کر مشکور فرمائیں تاکہ بندہ کو نئے شناختی کارڈ میں مذکورہ غلطی کی درستگی ہو سکے۔

شکریہ

مورخہ: 15-8-2013

العارض

آپکا تابعدار

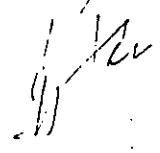
جان رفیق خود
15/8/13

صابر

صابر خان

پمپ ڈرائیور

C-11

1151/9-B
15/8/13

Atc
A



ANNEX G
OFFICE OF THE EXECUTIVE ENGINEER,
PESHAWAR CANALS DIVISION PESHAWAR.
PHONE # 091-9210102.

17

No. 5923 19-E
To.

Dated:- Peshawar, the 17/03/2014.

The Director General,
National Database & Registration Authority,
Phase-V, Hayat Abad Peshawar.

Subject:- CORRECTION IN THE DATE OF BIRTH.

Enclosed please find a self explanatory application made by Mr. Sabir Khan, Pump Driver attached to this Division.

The mentioned application requisitions correction in the date of birth allegedly inscribed wrongly in his computerized National Identity Card. In support of the applicant's claim, he has submitted the following documents.

1. Copy of Medical Certificate initially carried out at the time of his induction into Government service. The said certificate has been attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
2. Copy of his appointment letter bearing No.1763/33-E, dated 05-06-1991 issued by Executive Engineer, Tubewells Irrigation Division, Peshawar. Attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawa
3. Copy of the affidavit to the effect of the stated anomaly, attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
4. Copy of the press clipping of daily "Khyber" dated 06-08-2013, attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
5. Copy of the press clipping of daily "Subha" dated 07-08-2013 attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
6. Copy of the CNIC bearing No.21702-7668761-7, attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.

In this regard, it is requested that the matter kindly be examined and appropriate action taken with transmission to this office, please.

Encl: A.A.

Sd
EXECUTIVE ENGINEER.

Copy of the above is forwarded for information to the:-

1. Establishment Clerk (C-II), Peshawar Canals Division, Peshawar.
2. ✓ Mr. Sabir Khan, Pump Driver, Peshawar Canals Division, Peshawar.

ATC
22

M. S. M. M. M.
19/3/14
EXECUTIVE ENGINEER.



OFFICE OF THE
MEDICAL SUPERINTENDANT
SERVICES HOSPITAL, PESHAWAR

ANNEX H⁴

18

Phone: (Off) 091 9210509 (Exch) 091 9223472 Fax: 091 9210543

No: 6277 /MS/Admn/Age/2014-15

Dated: 28/11/2014

AGE ASSESSMENT CERTIFICATE.

Certified that Mr. Sabir Khan S/O Muhammad Umar R/O: Maidan, Tehsil: Ladha, South Waziristan Agency appeared before me on 28-11-2014 for his age assessment.

According to his own statement and birth certificate his age is about Forty Eight to Forty Nine (48-49) years.

He was examined for age assessment. On physical examination and bodily development his age is about Forty Eight to Forty Nine (48-49) years.

Mark of identification: Nil.

In valid for COURT/MEDICOLEGAL purpose.

DEPUTY DIRECTOR (PLANNING)
Office of the Chief Engineer (South)
Irrigation Deptt: Khyber Pakhtunkhwa
Peshawar

Medical Superintendent
Services Hospital
Peshawar.

Medical Superintendent
Police/Services, Hospital
Peshawar.



ANNA I
الحمد لله رب العالمين
بسم الله الرحمن الرحيم
الحمد لله رب العالمين
الحمد لله رب العالمين

صاحب خان ولد محمد عمر ستان سٹریٹ سٹریٹ دوو ہمایوں تحصیل و ضلع لشیارہ

مدرسہ دوو ہمایوں تحصیل (دعویٰ)
97/15/16
25/5/16

Or. ...
A SCJ. Pesh
02 DEC 2014

ATTESTED

27 MAY 2015
(Examiner)
Civil Court Peshawar

جنرل منیر نادر منیر لاشیات آباد لشیارہ

- 2- جسٹس نادر نادر لاشیات آباد لشیارہ
- 3- چیف ایگزیکٹو آفیسر ایپریٹینٹ ڈیپارٹمنٹ ورک ڈو
- 4- XEN صاحب ایپریٹینٹ ڈیپارٹمنٹ ورک ڈو ہمایوں لشیارہ

وہ صاحبان جو درج ذیل امور میں متعلق ہیں وہ اس کے تحت
 (محل) ورک ڈو تاریخ میں اسٹیشن 1-7-1966 ہے جس کے تحت
 اسات میں متعلقہ امور میں متعلقہ تاریخ میں اسٹیشن
 56-7-1-7-2 ورک ڈو ہے۔ کاغذات اسناد منجانب ورک ڈو
 جیل منڈر ہے تاریخ میں اسٹیشن 1-7-1966 اس کے تحت خلاف اراقات
 پر ورک ڈو منبذ ہے۔ غلط تاریخ میں اسٹیشن حقوق مدعی پر غلطی سے
 کالعدم ہے۔

دعویٰ نمبر 97/15/16 تاریخ میں اسٹیشن لاشیات آباد
 ورک ڈو کے تحت تاریخ میں اسٹیشن لاشیات آباد
 دہ

Attest
Handwritten signature

(2)

نامہ مدعی نے اسٹیمٹ اور اسٹیمٹ کے تحت پیش کردہ دلائل کو مدعی کی طرف سے

پیدا کرنے کے بارے میں اسٹیمٹ نمبر 13-2013-8-15 گزارہ جس کے تحت
Ref 5923/9EL مورخہ 2014-3-17 کو نادرا اور انسپشن کے پاس آباد

کے پاس در دستگی کا تاریخ میں اسٹیمٹ مدعی کے چھوٹی
Annex ("E, F") (دراصلت لہذا لکھیے)

نامہ مدعی نے بوقت عبوری میں بلوچستان ڈسٹرکٹ اور سیشن کورٹ کے
بابت سرورس دے مارنے کی وہ لکھی ہے۔ Annex "G"

نامہ مدعی نے درج ذیل کے پاس اسٹیمٹ اور اسٹیمٹ کے تحت پیش کردہ دلائل
سینٹ لوئیس ایجنٹ کے درمیان طور پر مدعی کی تاریخ میں 1966-7-1
تاریخ و رقم کے جو نام در دستگی کے

میں موجود اسٹیمٹ اور اسٹیمٹ کے تحت لکھی ہے۔ Annex "H - i"

نامہ مدعی نے اسٹیمٹ اور اسٹیمٹ کے تحت پیش کردہ دلائل کے بارے میں
AGI Assessment

20/AGI/Admn/MS/6277 مورخہ 2014-11-25 کو قانون کے

تحتیاً جاری کیا۔ Annex "J" (دراصلت لکھیے)

نامہ مدعی نے در دستگی کا تاریخ میں اسٹیمٹ کے تحت پیش کردہ دلائل کے بارے میں
"سینٹ لوئیس ایجنٹ" کے بارے میں درج ذیل
ATTESTED

7 MAY 2018
(Examiner)
Civil Court Peshawar

Annex "K - L"

Ate
D

(22)

دعوت نامہ کی باوجود علیحدہ سے دعوت نامہ پیدائش سے پہلے
بابت مطالبہ کیا گیا وہ انکار کیا گیا ہے یہ دعوت نامہ
ذریعہ لائق ہوگی۔

مقامی عدالت نے فیصلہ کیا ہے کہ اس میں واقعہ کی حالت و بنا کے تحت
دو پیشکشوں سے جو ان کے لئے دی گئی ہیں وہ 2012ء اور
2013ء کے لئے اس میں اس میں حاصل ہو۔

ان اس کے لئے نہ تو کسی سند ہے
جو اس کے لئے باوجود فرمائش کے
یا اس کے لئے فرمائش کے اور اس کے لئے فرمائش کے

27/12/2014
شہزاد محمد علی خان
ATTESTED

27, MAY 2016
(Examiner)
Civil Court Peshawar

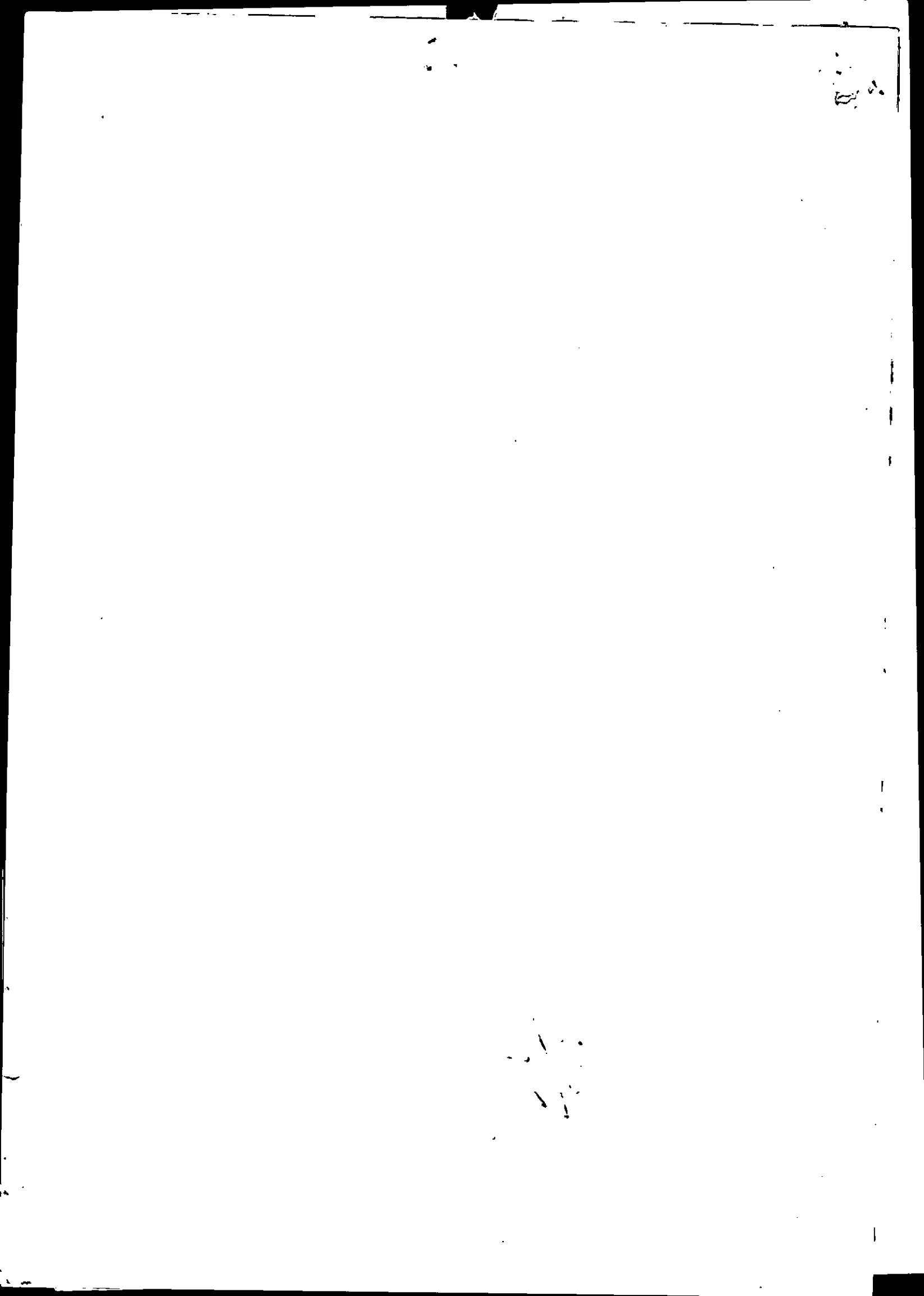
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- ۱۔ جنرل نیچر نادر احویات آباد فیئر-۷ پشاور
- ۲۔ رجسٹرار نادر احویات آباد فیئر-۷ پشاور
- ۳۔ چیف انجینئر صاحب ایریکشن ڈیپارٹمنٹ ورنگ روڈ پشاور
- ۴۔ XEN صاحب ایریکشن ڈیپارٹمنٹ ورنگ روڈ پشاور

نمبر شمار	دعویٰ	جواب دعویٰ
۱	یہ کہ سائل تحصیل لدھالغ جنوبی وزیرستان ایجنسی کا مستقل باشندہ اور محکمہ ایریکشن میں بطور ٹیوب ویل اپپ ڈرائیور ملازم ہے۔	فقہہ ہذا درست ہے۔
۲	یہ کہ مدعی کے قومی شناختی میں تاریخ پیدائش 1956ء درج ہے۔ جو کہ غلط خلاف واقعات اور سبب بنیاد ہے۔	فقہہ ہذا محتاج جواب نہ ہے۔
۳	یہ کہ مدعی کے سروس بک میں بھی غلط تاریخ پیدائش 01-07-1956 کا اندراج ہے۔ جو کہ غلط اور بے بنیاد ہے اور حقوق مدعی پر غیر موثر ہے جبکہ مدعی کا اصل اور درست تاریخ پیدائش 01-07-1966 ہے۔	فقہہ ہذا درست ہے۔
۴	یہ کہ مدعی نے ایگزیکٹو انجینئر پشاور کینال ڈویژن پشاور کو درستی تاریخ پیدائش کے بابت ایک درخواست بتاریخ 15-08-2013 گزاری جبکہ محکمہ کے چٹھی نمبر 5923/9-E مورخہ 17-03-2014 کو نادر آفس حیات آباد پشاور درستی تاریخ پیدائش مدعی بھجوائی۔	فقہہ ہذا درست ہے۔
۵	یہ کہ مدعی نے بوقت بھرتی ہونے بطور پمپ ڈرائیور جو میڈیکل سرٹیفیکٹ بابت سروس درکار تھی وہ لف ہے۔	فقہہ ہذا درست ہے۔
۶	یہ کہ مدعی نے مدرسہ چھوڑنے کا سرٹیفیکٹ اور پیدائش سرٹیفیکٹ اذال اسٹنٹ پولیٹکل ایجنٹ کے درست طور سے مدعی تاریخ پیدائش 01-07-1966ء درج و تحریر ہے۔ جو کہ درست و صحیح ہے۔	فقہہ ہذا کا تعلق مدعا علیہم سے نہ ہے۔
۷	یہ کہ مدعی کو میڈیکل سپرنٹنڈنٹ نے بابت صحیح عمر سرٹیفیکٹ Age Assessment چٹھی نمبر 6277/MS/Admn/Age/2014-15 مورخہ 25-11-2014 کو قانون کے مطابق جاری کیا۔	فقہہ ہذا محتاج جواب نہ ہے۔

At
D



ANNEX "K"

25

In the Court of Naveed Ahmed,
Civil Judge-XX Peshawar

SUIT NO.....97/01
DATE OF INSTITUTION.....2/12/2014
DATE OF DECISION.....25/5/2016

Sabir Khan S/O Muhammad Umer
R/O Warsak Road, Kabapyan, Peshawar
.....Plaintiff

VERSUS

1. General Manager NADRA phase V, Hayatabad Peshawar
2. Registrar NADRA Hayatabad Peshawar.
3. Chief Engineer Irrigation Department Warsak road.
4. XEN Irrigation Department Warsak road Kabapyan Peshawar..... Defendants.

SUIT FOR DECLARATORY AND
PERMANENT / MANDATORY INJUNCTION

JUDGMENT

This suit is for declaration to the effect that correct date of birth of plaintiff is July 1st 1966, while defendants have wrongly incorporated the same as July 1st 1956 which is illegal and ineffective upon his rights.

In Para "B" of the plaint, plaintiff has sought permanent injunctions to restrain the defendants to move further with or to take any step against the plaintiff on the base of this very wrong entry.

Plaint shows that plaintiff is tube well operator and date of birth in his CNIC is wrongly mentioned as July 1st 1956 which is ineffective upon his rights. That he applied to his department for the correction of this wrong entry on August 15, 2013, but the defendants denied making such correction. That his date of birth is correctly mentioned in his school leaving certificate and birth certificate issued by assistant

ATTESTED

27 May 2016

(Examiner)
Civil Court Peshawar

ATC
[Signature]

(21)

political agent. That persistent denial of defendants caused him to file this suit. Defendant No 1 and 2 appeared before the court, when summoned, through representative and counsel while defendant No 3 and 4 disappeared after attending the court for two or three dates, therefore, they were placed as ex parte.

Written statement was filed by defendant No 1 and 2 and thereafter following issues were framed.

1. Whether plaintiff has got cause of action?
2. Whether suit is within time.
3. Whether this court has got jurisdiction to entertain this suit?
4. Whether correct date of birth of plaintiff is July 1st, 1966 and defendants have wrongly written the same as 1956 in their record?
5. Whether plaintiff himself got entered his date of birth as 1956 while applying for his CNIC in the year 2002?
6. Whether plaintiff is entitled for the decree as prayed for?
7. Relief

After submission of list of witnesses both the parties were directed to produce their respective evidence.

Plaintiff counsel produced Mr. Ameer Rehman as PW 1, representative of NADRA office as PW-2, Mr. Khali Khan as PW 3, plaintiff himself as PW 4, Mr. Mujahideen as PW 5 and Muhammad Israr clerk Services Hospital Peshawar as PW 6. All these witnesses were cross examined and plaintiff evidence was closed.

Defendants produced one witness, Mr. Inayat Ur Rehman, the representative as DW 1 and after cross examination by counsel for the plaintiff, defendant evidence was also closed.

Then both the counsel for the parties advanced arguments and record was gone through.

Issues are hereby concluded in following way:

ATTESTED

27 MAY 2016

(Examiner)
Civil Court Peshawar

ATC
[Signature]

27

Issue No 3

This is the most important issue. Plaintiff himself admits that he is tube well operator, working under Irrigation Department. In evidence senior clerk Irrigation Department has produced plaintiff's service book, copy of which was retained as Ex PW 1/2 and it contains his date of birth as July 1st, 1956 and also contains the thumb and fingers impressions along with his signature. All these things suggest that plaintiff is a government servant. It is to be seen that when the question of alteration of date of birth of any person who is government servant arises, whether a civil court can entertain this matter or not.

If any alteration in date of birth is required, then the mode of correction in the same of a civil servant is duly provided under Rule 12(a) of civil servant rules 1973, which is part of the terms and conditions of service of civil servant and correction in date of birth by civil servant could not be done through a civil suit and civil servant will have to approach the service tribunal for alteration in his date of birth. Therefore the institution of suit before a civil court for correction in date of birth of a civil servant is barred under Rule 12 (a) of civil servants (Appointment promotion and transfer) rules 1973 R/W article 212 of the constitution. (Reliance is placed on SCMR, 2015 page 456). Issue is decided in favor of defendants.

Issue No 4 and 5

The basic contentions of plaintiff are that his correct date of birth is July 1st 1966 but defendants have written the same in their record as 1956 which is wrong and illegal. The defense was made on the sole point that it was plaintiff himself who got entered the date of birth as 1956 when he applied for his computerized NIC in the year 2002.

Plaintiff has relied on three documents for his correction which are, the school leaving certificate, birth certificate and age assessment certificate. In school leaving certificate and birth certificate, date of birth of plaintiff is mentioned as July 1st 1966. In age assessment certificate, issued by Medical Superintend Service Hospital Peshawar, the age of plaintiff has been assessed as 48/49 years. Although all these

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(Examiner)

Civil Court, Peshawar

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documents fully support the contentions of plaintiff but neither of these have been produced by relevant person or from proper custody. Plaintiff has further contended that a medical certificate issued by competent authority at the time of his entry into the service, his age was duly mentioned as 24/25 years and by calculating his age up to 24/25 years from his entry into in the service, his date of birth would ultimately be 1966 not 1956. But having a look over the service book, his date of birth is also mentioned as July 1st 1956 which duly contains his signatures, thumb and fingers impressions. Most importantly, his old NIC also contains his year of birth is 1956 which is clearly visible from document which was produced as ExPW 2/1.

So far issues No 5 is concerned, defendants have produced registration form of plaintiff where computerized NIC number is also mentioned along with the old IC number. As per his old IC number, his year of birth is duly mentioned as 1956 which was ultimately maintained in computerized NIC. Moreover, the registration form does contain the photograph of plaintiff along with his thumb impressions but defendants witness has categorically admitted that registration form does not contain the attestation of any officer. Moreover, the intention of defendants while incorporating the date of birth as 1956 in their record cannot be said as part of malafide because in old NIC, the date of birth of plaintiff was 1956 and it can be presumed that same was maintained while preparing his CNIC in the year 2002.

Plaintiff could not prove issue No.4 through reliable evidence, therefore same is decided against the plaintiff and defendants successfully proved issue No.5, therefore, this issue is decided in favor of defendants.

Issue No.2

This was upto plaintiff to shows that his case was within time. From the record, plaintiff is educated upto class-IV, thus it can be said that he is educated person. Plaintiff has categorically stated that he submitted an application in the year 2013, to his department for correction in his date of birth after getting knowledge of the same and he duly produced copy of that application in evidence. Although plaintiff obtained his CNIC in the year 2002 but it is nowhere proved that NADRA authorities

ATTESTED

27 MAY 2016

(Examiner)
Civil Court Peshawar

ATC
[Signature]

[Signature]

۱۱۵

محمد الہدیٰ الحق بائزر و شہزاد علی

مالیت لکھنؤ و فیصلہ مبلغ 3000 روپے

مالیت لکھنؤ من افسار علی مبلغ 3000 روپے

بائزر علی شہزاد علی علی اللہ اللہ اللہ اللہ

دشمنی کا قصہ؟؟؟ مورخہ 02/12/14 کو ڈاؤن کر دیا گیا
مورخہ 24/5/15 کو عدالت میں پیش کیا گیا

SHORT ORDER

The service book of plaintiff contains his date of birth as July, 1st 1956 and alteration in service book has also been required and findings on issue No.3, clearly indicate that this Court being a Civil Court, does not have jurisdiction to entertain instant suit. Evidence lead by plaintiff is not sufficient to prove his contentions and as this Court does not have the jurisdiction, therefore, suit of the plaintiff is hereby dismissed, with no orders as to costs

Naveed Ahmad
Civil Judge-XX, Peshawar

ATTESTED
27 MAY 2016
(Examiner)
Civil Court, Peshawar



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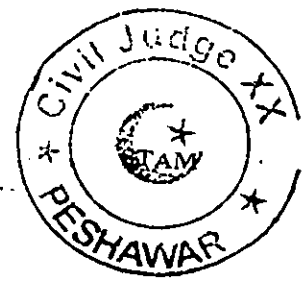
39

خرچہ نمائش

روپے	پے	مدعا علیہم	مدعی	روپے	پے
			اسٹامپ مرضی دہلوی اسٹامپ متیارنا۔ خرچہ خورا کہ گواہان فیس اہل کیشن مفرق		
		کل میزان			

حکم آخر آج تاریخ 24/5/16ء کو یہ ثبت دستخط میرے اور میری عدالت کے جاری ہوا۔

Naveed Ahmad
Civil Judge-XX, Peshawar



ATTESTED

27 MAY 2016

(Examiner)
Civil Court Peshawar

CERTIFIED TO BE TRUE COPY

(Examiner)
Copying Agency Civil Court
Peshawar

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POWER OF ATTORNEY

In the Court of MRK Sorwie Tokeul Peshor
Sahir Khan } For
 } Plaintiff
 } Appellant
 } Petitioner
 } Complainant

VERSUS

GAT of MRK and Mrs. } Defendant
 } Respondent
 } Accused
 }

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/We, the undersigned, do hereby nominate and appoint

IJAZ ANWAR ADVOCATE, SUPREME COURT OF PAKISTAN

and Sajid Amin Peshor my true and lawful attorney, for me in my same and on my behalf to appear at Peshor to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year 2016
Executant/Executants _____
Accepted subject to the terms regarding fee _____

Sajid Amin
SAJID AMIN
ADVOCATE HIGH COURT
Legal Advisor Services & Labour Laws Consultants
FR-3-4, Fourth Floor, Bilour Plaza Peshawar Cantt.
Ph: 091-5272054, Mob: 0333-4564966, 03339155956

Ijaz Anwar
Ijaz Anwar
Advocate High Courts & Supreme Court of Pakistan

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3 & 4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Ph.091-5272154 Mobile-0333-9107225

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.**

Appeal No.626/2016

Sabir Khan Pump Driver

Appellant.

· VERSUS

Government of Khyber Pakhtunkhwa Irrigation Department
& others.....

Respondents.

Parawise comments on behalf of respondents are submitted as under: -

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

1. That the appellant has not come to this Honourable Tribunal with clean hands.
2. That the appellant has got no cause of action.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the present appeal is bad in its present form hence not maintainable and liable to be dismissed.

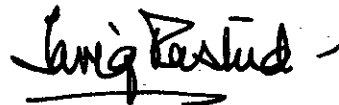
REPLY ON FACTS:-

1. Correct, hence, no comments.
2. Pertains to record, hence, no comments.
3. Pertains to record, hence no comments.
4. The date of birth in his service book was recorded according to the date of birth recorded in his National Identity Card i.e 01-07-1956.
5. Pertains to record, hence no comments.
6. The correction of date of birth in service record was subject to correction in the National Identity Card by NADRA. This department forwarded the request of the appellant to Director General NADRA for correction of his date of birth, but they did not agreed.
7. Correct, hence, no comments.
8. Incorrect. The appellant's this appeal holds no legal grounds and may please be dismissed.

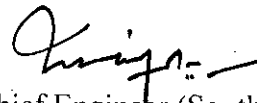
REPLY ON GROUNDS:-

- A. Incorrect. The appellant has been treated as per rules / law & there is no violation.
- B. Incorrect. The date of birth of the appellant in his service book was recorded according to the date of birth as per his National Identity Card i.e 01-07-1956. Hence, no mistake committed.
- C. According to the service laws, the date of birth is reckoned from the service book / record and if any ambiguity persists, then reliance on the C.N.IC is made. The appellant was required to record the date of birth according to the School Leaving Certificate at the time of apply for National Identity Card.
- D. Same as per para – B.
- E. Replied as per para – B.
- F. Pertains to record, hence, no comments.
- G. Same as per para – B.
- H. The correction in service record of the appellant is subject to the correction in the National Identity Card.
- I. The respondents also seek permission to this Honourable Tribunal to present further / additional, if any, grounds etc. at the time of arugments.

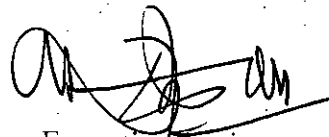
It is therefore prayed that the appellant's plea holds no legal grounds. His appeal may please be dismissed.



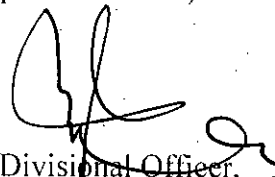
Secretary to Government
of Khyber Pakhtunkhwa,
Irrigation Department, Peshawar.
(Respondents No.1)



Chief Engineer (South),
Irrigation Department,
Khyber Pakhtunkhwa Peshawar.
(Respondents No.2)



Executive Engineer,
Peshawar Canals Division,
Peshawar.
(Respondents No.3)



Sub Divisional Officer,
Kabul River Canal Sub Division,
Peshawar.
(Respondents No.4)

No. 1763 / 33-E, Peshawar the 5/6/1991.

Mr. Sabir Khan
10
Mohamed Umar South Waziristan Agency.

ANNEX A

10

SUBJECT: / APPOINTMENT OF TUBEWELL OPERATOR (T/W No. PST-7 - Doaba)

You are hereby offered a post of T/wall OPERATOR at Rs. 657 p.m. in the basis pay scale No. 4 i.e. plus usual allowances as admissible under the rules.

Your appointment is purely temporary and can be terminated on 15 days notice on either side without assigning any reasons irrespective of the facts that you are holding a post other than one to which you are originally recruited or on the payment of 15 days salary in lieu of the notice.

You will produce the following:-

1. Domicile certificate.
2. A certificate to the effect that you are not a dismissed Government servant.
3. Health and age certificate.
4. Declaration form duly signed by you.
5. Educational certificate in case of T/well optr;

You will be governed by such rules and orders that may be issued from time to time for such category of Govt. servants to which you belong. Your services would be terminated without assigning any reasons if you are found guilty of misconducts or breach of service rules.

This offer is subject to the conditions that you fulfill necessary service entry requirements and you are not over/underage.

If you accept the offer on the above conditions you should report for duty to the S.D.O. Tubewells Irrigation Sub-Division and produce all the above documents to him for further necessary action.

This offer will be considered as cancelled if reply is received within 10 days from the receipt of this offer.

This offer issued with the approval of Departmental selection committee.

Executive Engineer
Tubewells Irr:Divn:Peshawar

Copy forwarded to the following:-

- 1/ A.G.N.W.F.P., Peshawar for information.
- 2/ S.D.O. T/wells Irrigation Sub-Division P for information and necessary action. Original copy of unmasking given by land owner is returned for placing of record.
- 3/ O.A. (local).
- 4/ C-II (local).

Executive Engineer
Tubewells Irr:Divn:Peshawar

ANNEXURE B
 سول ڈسٹرکٹ ہائی اسکول پشاور

17/6/2019

منظور شدہ سرکاری اسکول
 مندرجہ ذیل طلبہ

مدرسہ چھوڑنے کا سرٹیفکیٹ

11

نام طالب علم: صابر خان
 تاریخ پیدائش: 17/7/1998
 نمبر رجسٹرڈ دفتر: 1350
 تصدیق کیا جاتا ہے کہ صابر خان ولد محمد ع نے جو اس مدرسے میں
 تاریخ 17/7/1998 تک پہلے پڑھتا رہا اور اس کے ذمہ واجب الادا نہیں اور کسی میں اور اسے تاریخ مندرجہ بالا پر
 اپنا نام خارج کرنے کی اجازت دی گئی ہے اس کے لئے اس کا امتحان جسٹس میں پہلے میں پڑھنا تھا اور
 ان طلبہ کی صورت میں جو اس کا امتحان لیا گیا تھا جس میں پہلے پاس ہوا
 مدرسے سے کسی حصہ کی منتقلی نہ ہوگی
 پڑھائی کے اختتام پر پہلے منتقل ہوا
 منسٹریں جس میں طالب علم شامل ہوا
 ان طلبہ کی صورت میں جو مدرسے کے
 کسی حصہ کی منتقلی کرنا ہی کے اختتام
 پر پہلے میں لیا گیا تھا جس میں پہلے پاس ہوا
 جس کا اور وہ لیا گیا
 اس کا امتحان جسٹس میں لیا گیا تھا
 جس کا اور وہ لیا گیا

تصدیق کیا جاتا ہے کہ مندرجہ ذیل اندراج اس مدرسے کے رجسٹرڈ اور ان سائٹ ٹیچروں کے مطابق ہے جس میں جو اس نے ان مدرسوں سے حاصل
 کیے ہیں۔ جہاں اس تعلیمی سال میں اس سے پہلے تعلیم پائی ہے۔

نمبر	نام مدرسہ	داخل ہونے کی تاریخ		خارج ہونے کی تاریخ		سال مدرسہ جاری کی مدت	سال مدرسہ جاری کی مدت	تعداد	رخصت جو سال
		کون	ادب	کون	ادب				
1	مدرسہ چھوڑنے کا سرٹیفکیٹ								
2	مدرسہ چھوڑنے کا سرٹیفکیٹ								
3	مدرسہ چھوڑنے کا سرٹیفکیٹ								
4	مدرسہ چھوڑنے کا سرٹیفکیٹ								

تاریخ اجراء 17/6/2019
 صرف سکاٹر شپ پانے والوں کی صورت میں

قسم سکاٹر شپ
 کس سال مطابق
 کون دیتا ہے

1. قریب عام طور پر مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے درخواست مدرسے سے ملنے والے طلبہ کے لئے ایک ماہ کے اندر پوری ہوتی ہے۔
 2. ان طلبہ کے جنہوں نے ڈیل سکول کا امتحان دیا ہو۔ ایک ماہ فروری تک کی تاریخ سے گنتا جاتا ہے۔
 3. بعد گزرنے ایک ماہ کے مدرسہ چھوڑنے کے سرٹیفکیٹ کے لئے موازی آٹھ گھنٹے ٹیس جاری ہوگی۔
 4. اگر مدرسہ چھوڑنے کا سرٹیفکیٹ کم ہو جائے اور اسے سرٹیفکیٹ کے لئے درخواست دی جائے تو یہ سرٹیفکیٹ کیے موازی آٹھ گھنٹے ٹیس کے لئے جاری ہے۔

تصدیق کیا جاتا ہے۔ ولد _____ طالب علم _____ جماعت _____
 مدرسہ _____ سکول _____ ضلع _____
 اس کی تاریخ پیدائش _____

Attest
 21504
 TECHNICAL OFFICER SOUTH
 IRRIGATION DEPARTMENT
 KHYBER PAKHTUNKHWA
 PESHAWAR

Ammed C
(12)

MEDICAL CERTIFICATE

Name of Officer: Mr. Sabir Khan
Muzed

Village: Madana P. O. + Teh. Madana
Distt. D.I. Khan

Height measurement: 5-3
Personal mark of identification: 4 scars above the mucus
Signature of the Officer: [Signature]
Signature of head of office: [Signature]

Seal of Office

S. Sabir Khan
Muzed
Teh. Madana

25/26

A. H. [Signature]

Medical Services Hospital
Deshawari

[Signature]

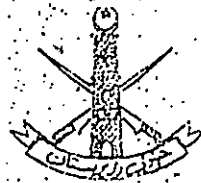
Annex "D"

13



پیدائش سرٹیفکیٹ

BIRTH CERTIFICATE



District SNA تعلقہ Tehsil Town لہذا تحصیل Village مہراں گاؤں

Gender مرد جنس Name صاحب خان نام

ID Card Number (if available) شناختی کارڈ نمبر (اگر ہو تو)

21702-7668761-7

Place of Birth حویلی دہستان لہذا جگہ پیدائش Date of Birth 07-07-1966 تاریخ پیدائش

Father's Name محمد عمر والد کا نام

ID Card Number (if available) شناختی کارڈ نمبر (اگر ہو تو)

[Empty ID Card Number box]

Mother's Name والدہ کا نام

ID Card Number (if available) شناختی کارڈ نمبر (اگر ہو تو)

[Empty ID Card Number box]

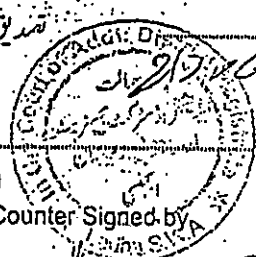
Religion مذہب اسلام Caste جمہوریہ والد کی قومیت (ذات)

Father's Present Address والد کا موجودہ پتہ

Father's Permanent Address والد کا مستقل پتہ

ہم امکان اس بات کی تصدیق کرتے ہیں کہ مندرجہ بالا تفصیل ہمارے علم کے مطابق بالکل درست اور صحیح ہے۔ غلط بیانی پر ہم ذمہ دار ہوتے۔

Attested by Tehsildar Political Naib Tehsildar Tatha South Water Agency NIC90406-0115685-5



Assistant Political Naib Additional Tehsildar

Attested Deputy Director Design OIO Chief Engineer Irrigation Department Peshawar

Note: The entries in this page should be renewed or re-attested at least every five years and the signature if not renewed should be dated.

1. Name

Sabit Khan

(14)

2. Race

Musced. ANNEX "E"

3. Residence

Village Midan. P.O. and Tehsi Lada Dist. D.Khan

4. Father's name and residence

Mohammad Ummid. Village Midan. P.O. & Tehsi Lada Dist. D.Khan

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

1st JULY NINETEEN HUNDRED AND FIFTY SIX (1-7-1956)

6. Exact height by measurement

5-7"

7. Personal marks for identification

A Scar above the inner margin of Right eye.

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

c/c. b2w

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant

Sabit Khan

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

Sub Divisional Officer
Tubwells Trv. Sup. Divn
Beshawar

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 commences for position 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 and Government of the Province of the officer or Agent in Charge of the post
<u>11 Operator</u> S-22-1115			Rs. 397 <u>675</u> 10057			6-6-91 Finance	
					Sub. Divisional Officer Peshawar		
<u>11 Operator</u> 43-165			<u>10057</u>			6-6-91	Pay R. Villo Desat. 1-1-93

15

10	11	12	13		14	15
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature of the head of the office or other attesting officer	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer
	Reported arrival for duty on 6/6/91	Forenoon	Appointed as Tube Well Controller A.H.S. 16/7/91			Sub Divisional Officer Tubewells Irr. Sub Divn Peshawar
	Pay Revised with effect from 7/1/91					Service for the purpose of which on from the Est. Pay Bills Etc.
	Vide Govt. of NWFP, Finance Deptt. Peshawar No. FD/PRC/1-1/1990, dated 11-3-1991.					Executive Engineer Tubewells Irrigation Division, Peshawar
	30/7/91 (AM)		Transferred to Kohat Irrigation Division Kohat vide Chief Engineer Irrigation Peshawar letter No. 30148-53/13/1/97-G.O. dt. 12-10-1992			Executive Engineer Tubewells Irrigation Division Peshawar
						Service for the purpose of which on from the Est. Pay Bills Etc.
						Executive Engineer Tubewells Irrigation Division Peshawar

Name of person	Whether interested in or otherwise connected with the operation of the business	and whether (a) stockholder, (b) subscriber, or partner in the business	Name of person	Title or position	Address	City and State	Date of birth	Date of death	Date of entry into U.S.A.	Date of departure from U.S.A.
D. W. D. [unclear]										
[unclear]										
[unclear]										

Table of Operators - 01/51
 B.P.S. 4 (1005-43-1150) 7/1/51

10/31/01
 10/31/01

10/31/01
 10/31/01

10/31/01
 10/31/01

16

508

محضوہ جناب ایگزیکٹو انجینئر پشاور کینالز ڈویژن پشاور

ANNEX "F"

جناب عالی:-

گزارش ہے کہ بندہ آپ صاحبان کے زیر سایہ ایلور پمپ ڈرائیور خدمات دے رہا ہے۔ بندہ کا قومی شناختی کارڈ میں بندہ کی عمر سال پیدائش غلطی سے 1966 کی بجائے 1956 درج ہے۔ جبکہ بندہ کی اصل سال پیدائش 1966 ہے۔ جو کہ بندہ کی سرورس بک میں موجود ڈاکٹری سرٹیفکیٹ سے واضح ہے۔ لہذا گزارش ہے کہ بندہ کی درخواست کو نادرہ (NADRA) دفتر ارسال کرنے کے احکامات صادر فرما کر مشکور فرمائیں تاکہ بندہ کو نئے شناختی کارڈ میں مذکورہ غلطی کی درستگی ہو سکے۔

شکریہ

الحاض

آپ کا تابعدار

صابر خان

پمپ ڈرائیور

پمپ ڈرائیور

C-5

15/8/13

15/8/13

16-8-2013 مورخہ

1151/9-E

15/8/13



ANNEX G

OFFICE OF THE EXECUTIVE ENGINEER,
PESHAWAR CANALS DIVISION PESHAWAR.
PHONE # 091-9210102.

(17)

No. 5923 19-E

Dated:- Peshawar, the 17/03/2014.

To,
The Director General,
National Database & Registration Authority,
Phase-V, Hayat Abad Peshawar.

Subject:- CORRECTION IN THE DATE OF BIRTH.

Enclosed please find a self explanatory application made by Mr. Sabir Khan, Pump Driver attached to this Division.

The mentioned application requisitions correction in the date of birth allegedly inscribed wrongly in his computerized National Identity Card, in support of the applicant's claim, he has submitted the following documents.

1. Copy of Medical Certificate initially carried out at the time of his induction into Government service. The said certificate has been attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
2. Copy of his appointment letter bearing No.1763/33-E, dated 05-06-1991 issued by Executive Engineer, Tubewells Irrigation Division, Peshawar. Attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawa
3. Copy of the affidavit to the effect of the stated anomaly, attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
4. Copy of the press clipping of daily "Khyber" dated 06-08-2013, attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
5. Copy of the press clipping of daily "Subha" dated 07-08-2013 attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.
6. Copy of the CNIC bearing No.21702-7668761-7, attested by Technical Officer, office of the Chief Engineer (South), Irrigation Department, Khyber Pakhtunkhwa Peshawar.

In this regard, it is requested that the matter kindly be examined and appropriate action taken with transmission to this office, please.

Encl: A.A.

Sd
EXECUTIVE ENGINEER.

Copy of the above is forwarded for information to the:-

1. Establishment Clerk (C-II), Peshawar Canals Division, Peshawar.
2. ✓ Mr. Sabir Khan, Pump Driver, Peshawar Canals Division, Peshawar.

M. Sabir Khan
19/3/14
EXECUTIVE ENGINEER.



OFFICE OF THE
 MEDICAL SUPERINTENDANT
 SERVICES HOSPITAL, PESHAWAR

Phone: (Off) 091 9210509 (Exch) 091 9223472 Fax: 091 9210543

ANNEX H^y (18)

No: 6277 /MS/Admr/Age/2014-15

Dated: 28/11/2014

AGE ASSESSMENT CERTIFICATE.

Certified that Mr. Sabir Khan S/O Muhammad Umar R/O: Maidan, Tehsil: Ladha, South Waziristan Agency appeared before me on 28-11-2014 for his age assessment.

According to his own statement and birth certificate his age is about Forty Eight to Forty Nine (48-49) years.

He was examined for age assessment. On physical examination and bodily development his age is about Forty Eight to Forty Nine (48-49) years.

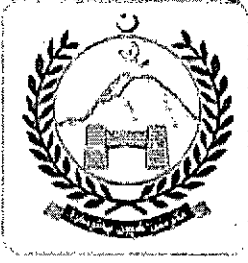
Mark of identification: Nil.

In valid for COURT/MEDICOLEGAL purpose.

DEPUTY DIRECTOR (PLANNING)
 Office of the Chief Engineer (Civil)
 Irrigation Deptt: Khyber Pakhtunkhwa
 Peshawar

Medical Superintendent
 Services Hospital
 Peshawar:
 Medical Superintendent
 Police/Services, Hospital

28/11/14



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 2158 /ST Dated: 31/10/2017

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262


To,

The Executive Engineer, Canals Division,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - JUDGMENT IN APPEAL NO. 626/2016, SABIR KHAN.

I am directed to forward herewith a certified copy of judgment dated 27/09/2017 passed by this tribunal on the above subject for strict compliance.

Encl: as above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

To

The Chairman
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Khyber Pakhtunkhwa
Service Tribunal

Duty No. _____

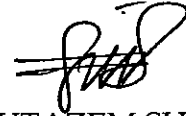
Dated _____

Subject: Arrival Report

Sir,

With reference to your letter No. 2108-11/ST dated 15-09-2017, I hereby submit my arrival report for duty w.e.f 15-09-2017(F.N)

Yours Sincerely



MUTAZEM SHAH
JUNIOR SCALE
STENOGRAPHER