

17.07.2020

None for the appellant and Addl: AG alongwith Mr. Irfan, Assistant for respondents present.

Written reply on behalf of respondents not submitted. Representative of the respondents seeks time. Notices be issued to respondents for reply.

Adjourned to 10.09.2020 before S.B.

(Mian Muhammad)
Member(E)

U6>17
I want to withdraw my appeal as my grievances has been redressed by department.
Shahid Khan CNIC# 11101-1396535-7

10.09.2020

Appellant with counsel and Addl. AG alongwith Muhammad Amjad, XEN and Irfan Assistant for the respondents present.

Appellant states that his grievance has been redressed by the respondents and requests for withdrawal of instant service appeal.

Dismissed as such. File be consigned to the record.

Chairman

ANNOUNCED

10.09.2020

Service Appeal No. 417/2019

19.02.2020

None present on behalf of the appellant. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Irfan, Assistant and Zakiullah, Senior Auditor for the respondents present. Written reply on behalf of respondents not submitted. Representatives of the department seek further time to furnish written reply/comments. To come up for written reply/comments on 16.03.2020 before S.B. Notice be also issued to appellant and his counsel for attendance for the date fixed.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

16.03.2020

Nemo for the appellant. Mr. Kabirullah Khattak learned Addl. AG for the respondents present. None present on behalf of respondents department nor submitted written reply/comments, therefore, fresh notice be issued to respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 22.04.2020 before S.B.


Member

22.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 17.07.2020 for the same. To come up for the same as before S.B.


Reader

24.10.2019

Counsel for the appellant present. Mr. Kabirullah Khattak learned Addl; AG alongwith M/S Sajid Superintendent and Zaki Ullah Senior Auditor for the respondents present.

Representative of respondents has produced copy of Pension Roll Data Sheet & Pension Slip, which is placed on record. Learned counsel for the appellant requires time to go through the submitted documents and seek fresh instructions from the appellant.

Adjourned to 28.11.2019 for further proceedings before S.B



Chairman

28.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Sajid Superintendent for the respondents present.

Request for adjournment is made on behalf of learned counsel for the appellant to seek fresh instructions from the appellant in the light of order dated 24.10.2019.

Adjourned to 09.01.2020 for further proceedings.



Chairman

09.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Sajid Superintendent for the respondents present.

Due to general strike of the Bar, the matter is adjourned to 19.02.2020 for further proceedings in the light of order dated 24.10.2019.



Chairman

08.08.2019

Mr. Mirzaman Safi, Advocate on behalf of learned counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Muhammad Yaseen, B&A officer for the respondents present.

The representative of respondents requests for further time to furnish the requisite reply.

Adjourned to 30.09.2019 on which date the requisite reply shall positively be furnished.



Chairman

30.09.2019

Nemo for appellant. Addl. AG alongwith Zakirullah, Senior Auditor and Muhammad Shafique, Senior Clerk for the respondents present.

Representatives of the respondents seek time to furnish comments on behalf of the respondents. To come up for requisite reply/comments on 24.10.2019 before S.B.



Chairman

22.04.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that he was appointed as Chowkidar on fixed by vide order dated 19.01.1995. Subsequently, he was awarded BPS-1 and his services were regularized vide order dated 30.08.2008. On reaching the age of superannuation, he stood retired from government service on 08.02.2011 vide order dated 08.02.2011. As pensionary benefits were denied to the appellant so he filed departmental appeal on 19.12.2018, which remained unresponded, hence, the present service appeal. A monetary benefits are involved so limitation would not affect the cause of action of the appellant. Numerous cases of similar nature have been allowed by this Tribunal and Hon'able Peshawar High Court.

Points urged need consideration. Admit, subject to limitation. The appellant is directed to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 24.06.2018 before S.B.

Appellant Deposited
Security & Process Fee

(AHMAD HASSAN)
MEMBER

24.06.2019


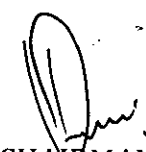
Counsel for the appellant and Addl: AG for respondents present. Written reply/comments on behalf of respondents not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 08.08.2019 before S.B.

(Ahmad Hassan)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 417/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/04/2019	<p>The appeal of Mr. Sher Dad Khan presented today by Mr. Zafar Ali Khan. 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 21/4/19</p>
2-	03/04/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>22/04/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

S.A.No. 417 /2019

Sher Dad Khan..... Appellant

Versus

Govt of K.P through Secretary Finance and othersRespondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Memo of appeal.		1-3
2	Affidavit.		4
3	Addresses of the parties.		5
4	Copy of the appointment order	A	6
5	Copy of office order	B	7
5	Copy of service book	C	8 - 12
6	Copy of departmental appeal and postal receipts	D	13 - 14
7.	Wakalatnama.		15

Appellant

Through



ZAFAR ALI KHAN

Advocates High Court Peshawar

Off: 214 Syed Ahmad Ali Building

Near Taj Autos, Sunehri Masjid

Road, Peshawar Cantt.

Office No.091-5279292

Cell: 0306-5965853

0333-9349442

Dated:

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR

S.A.No. 417 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 508

Dated 02-4-2019

Sher Dad Khan son of Izzat Khan
R/o Ghaffar Qilla, Ghora Bakla Khel,
Tehsil and District Bannu..... Appellant

VERSUS

- 1) Government of Khyber Pakhtunkhwa, through Secretary Finance Civil Secretariat, Peshawar.
- 2) Government of Khyber Pakhtunkhwa, through Secretary Public Health Civil Secretariat, Peshawar.
- 3) Chief Engineer Public Health Department, Peshawar Fort Road, Peshawar Cantt.
- 4) Superintendent Engineer Public Health Department, District Bannu.
- 5) Executive Engineer Public Health, Bannu.
- 6) Sub-Divisional Engineer Public Health, Bannu.
- 7) District Account Officer, Bannu.
- 8) Accountant General, Fort Road, Peshawar Cantt, Peshawar.

..... Respondents

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE RESPONDENT WHEREBY THE DEPARTMENTAL REPRESENTATION OF THE APPELLANT HAS NOT BEEN DECIDED AND THE STIPULATED PERIOD HAS BEEN PASSED.

Filed to-day

Registrar

2/4/19

Prayer:

On acceptance of this appeal, the appellant may kindly be declared entitled for the pension, gratuity and other benefits and direct the respondents to issue pension, gratuity and other benefits immediately.

Respectfully Sheweth;

Appellant humbly submits as under:

- 1) That appellant was appointed as Operator on dated 19.07.1994 in Public Health Department. (Copy of the order is Annexed as Annexure "A").
- 2) That later on the services of the appellant was regularized, as BPS-014 on 30.08.2008. (Copies of office order and service book are Annexure "B and C").
- 3) That the appellant has been retired from service on 04.12.2012.
- 4) That appellant moved departmental appeal to the respondent No.2 for the issuance of pension, gratuity and other benefits on dated 19.12.2018 but still has not been decided by the respondents and the stipulated period has been passed. (Copy of departmental appeal is Annexure "D").
- 5) That aggrieved with, appellant has come before this Hon'ble Tribunal in this appeal on the following grounds amongst the others for a direction to the respondents to issue pension along with other benefits to the appellant.


GROUND:

- a. That the respondent is not issuing pension, gratuity and other benefits to the appellant is against the facts and untenable in law.
- b. That the appellant has served in the education department for a period of almost 17/18 years, therefore, according to law and rules of services the appellant is entitled for the pension, gratuity and other benefits.
- c. That the respondents failed to appreciate the real point involved in the case in its perspective. Hence has arrived at an incorrect conclusion.

- d. That by not awarding/ issuing the pension to the appellant, respondents are violating the terms and conditions of service as well as the service laws and rules.
- e. That by not issuing the pension benefits to the appellant, respondents are violating the fundamental rights of the appellant because there is no source of income of appellant except this pension etc.
- f. That the respondents by not issuing the pension to the appellant are exercising the powers not vested to them under the law.
- g. That the non-disposal of departmental appeal by the respondents is perversant and against the settled principle of law and justice.

It is, therefore, requested that on acceptance of this appeal, the appellant may kindly be declared entitled for the pension, gratuity and other benefits from the date of appointment and direct the respondents to issue pension, gratuity and other benefits immediately.

Any other relief which this Hon'ble Tribunal deems appropriate in the circumstances of the case and not specifically asked for may kindly also be granted.



Appellant

Through


ZAFAR ALI KHAN
Advocate High Court Peshawar

CERTIFICATE:

Certified as per information furnished by my client that no such like appeal has earlier been filed before this Hon'ble Tribunal.


Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR

S.A.No. _____/2019

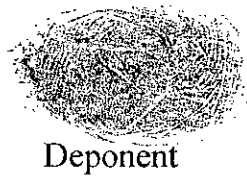
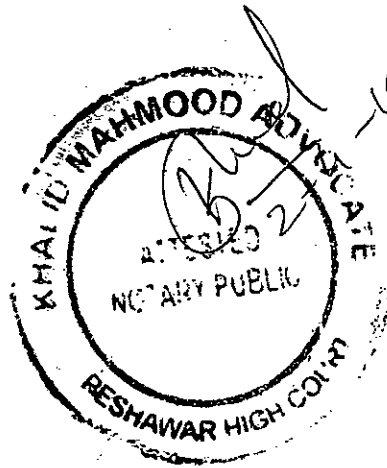
Sher Dad Khan..... Appellant

Versus

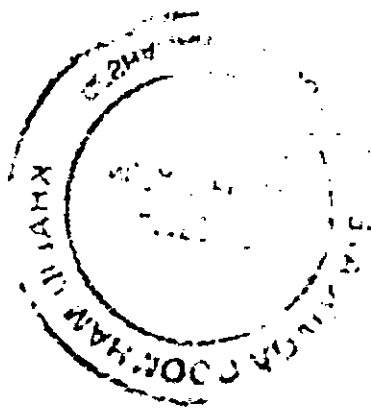
Govt of K.P through Secretary Finance and othersRespondents

AFFIDAVIT

I, Sher Dad Khan son of Izzat Khan R/o Ghaffar Qilla, Ghora Bakla Khel, Tehsil and District Bannu do hereby affirm and declare on oath that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this hon'ble court.



Deponent



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

S.A.No. _____/2018

Sher Dad Khan..... Appellant

Versus

Govt of K.P through Secretary Finance and others Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Sher Dad Khan son of Izzat Khan
R/o Ghaffar Qilla, Ghora Bakla Khel,
Tehsil and District Bannu

RESPONDENTS:

- 1) Government of Khyber Pakhtunkhwa, through Secretary Finance Civil Secretariat, Peshawar.
- 2) Government of Khyber Pakhtunkhwa, through Secretary Public Health Civil Secretariat, Peshawar.
- 3) Chief Engineer Public Health Department, Peshawar Fort Road, Peshawar Cantt.
- 4) Superintendent Engineer Public Health Department, District Bannu.
- 5) Executive Engineer Public Health, Bannu.
- 6) Sub-Divisional Engineer Public Health, Bannu.
- 7) District Account Officer, Bannu.
- 8) Accountant General, Fort Road, Peshawar Cantt, Peshawar.

Appellant

Through



ZAFAR ALI KHAN
Advocate High Court Peshawar

PUBLIC HEALTH ENGINEERING DIVISION BANNU

6
Annex
A

NO. /8-23 /E-16 Dated Bannu the 18/7/1994.

Mr. Sher Dad Khan S/O Izat
Khan village Mir Ghaffar Killa
Ghora Bakka Khel Tehsil and
District Bannu

Subject:- OFFER OF APPOINTMENT
Ref:- Your Interview the Post of Operator

You are hereby offered an appointment on purely a contract basis for an year and subject to release of continuous of post from Finance Deptt/Chief Engineer, PHE NWFP Peshawar as Operator on WSS K. Mir Ghaffar (Ors: 1005/-/P.M. in APS No. 4 i.e. Rs: 1005-43-1650 plus usual allowance on the following terms & conditions.

- 1) Your appointment will be purely temporary basis as top-gap arrangement on contract basis for an year extendable till your service are required by the Deptt for which then you will have to furnish a fresh agreement for the same.
- 2) Your appointment as Operator (contract basis) is liable to termination at any time, without any Notice & without assigning any reason during the period of contract appointment, if your work during this period is not found satisfactory.
- 3) You will be liable to serve any where in this Divn.
- 4) You will have no claim to the right of seniority.
- 5) You will be governed by Rules of PHE Deptt as regards service conditions.
- 6) You will be governed by such rules and order relating to conduct, efficiency, discipline, leave, T.A, Medical, Attendance and pay etc: as may be issued by the Govt: for that category to which you will belong.
- 7) You will have to furnish a declaration in writing that:-
 - i) You have not been resigned from service under Govt or any body.
 - ii) You have not been dismissed by any other Agency.
- 8) You will have to produce a medical fitness certificate from the Medical Superintendent Distt Head Quarter Hospital Bannu.

If you are willing to accept the above mentioned terms and conditions you should sign the attached agreement, in duplicate & submit the same to S.D.O. P.H. Engg: S/Divn Bannu within which 14 (Fourteen) days alongwith your Arrival Report for duty, failing which the offer shall stand cancelled automatically.

EXECUTIVE ENGINEER
PUBLIC HEALTH ENGG: DIVN
BANNU

Copy is forwarded for
favour of information
to:-

1. The Chief Engineer, PHE NWFP Peshawar pl:
2. The Superintending Engineer, PHE Circle, Bannu pl:
3. The Personal Secy: to Minister for Irr & PHE NWFP w/r to his recommendation on application pl:
4. Mr. Sayed Munir Shah MPA of the Area.
5. The SDO PHE S/Divn Bannu Contract Agreement may be obtained from the Official prior to accept his arrival report.
6. The District Accounts Officer Bannu/DA (Local)

(A)
A. [Signature]

[Signature]
Executive Engineer
Public Health Engrg: Division
19/7/94

PUBLIC HEALTH ENGINEERING DIVISION BANNU

No. 18-23/E-16 Dated Bannu the 19.7.1994

Mr. Sher Dad Khan S/o Izat
Khan village Mir Ghaffar Killa
Ghora Bakka Khel Tehsil and
District Bannu

Subject: Offer of appointment
Ref: Your interview the post of Operator

You are hereby offered an appointment on purely & contract basis for an year and subject to release of continuous of post from. Finance Dept/ Chief engineer, PHD NWFP Peshawar as Operator on WSS K.Mir Ghaffar Rs. 1005/- P.M in APR No. 4 i.e. Rs. 1005-43-1650 plus usual allowance on the following terms & Conditions.

1. Your appointment will be purely temporary basis as top gap arrangement on contract basis for an year extendable till your service are required by the deptt for which then you will have to furnish a fresh agreement for the same.
2. Your appointment as operator (contact basis) is liable to termination at any time, without any notice & without assigning any reason during the period of contact appointment, if your work during this period is not found satisfactory.
3. You will be liable to serve any where in this Divn:
4. You will have no claim to the right of seniority.
5. You will be governed by Rules of PHE Deptt as regards service conditions.
6. You will be governed by such rules and order relating to conduct, efficiency, discipline, leave, T.A Medical Attendance and pay etc: as may be issued by the Govt: for that category to which you will belong.
7. You will have to furnish a declaration in writing that:-
 - i. You have not been resign from service under Govt for or any body.
 - ii. You have not been dismissed by any other agency.
8. You will have to produce a Medical fitness certificate from the Medical superintendent Distt Head quarter Hospital Bannu.

If you are willing to accept the abovementioned terms and conditions you should sign the attached agreement, in duplicate submit the same to SDO P.. Engg: S/Divn Bannu within which 14 (Fourteen) days alongwith your arrival report for duty, failing which the offer shall stand cancelled automatically.

Executive Engineer
Public Health Engg: Divn:
Bannu

Copy is forwarded for favour of information to:-

1. The Chief Engineer, PHED NWFP Peshawar pl:
2. The Superintending Engineer PHS Circle ,D I Khan pl:
3. The personal secy: to Minister for Irr & PHED NWFP. w/r to his recommendation on application pl:
4. Mr. Sayed Munir Shah MPA of the area.
5. The SDO PHE S/Divn Bannu contract Agreement ay be obtained from the official prior to accept his arrival report.
6. The District Accounts officer Bannu/ DA(Local)

ATTESTED

GOVERNMENT OF NWFP
FINANCE DEPARTMENT

No. BO1/FD/1-22/2008-09/
Dated Peshawar, the 30/7/2008

7
Annex B

To

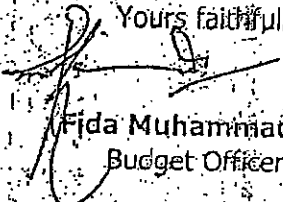
The Accountant General,
NWFP, Peshawar.

Subject:- BUDGET SPEECH 2007-08 CONVERSION OF FIXED PAY CLASS-IV
INTO REGULAR BPS-1 CP FUND SCHEME.

Dear Sir,

I am directed to refer to your letter No.H.24(85)/Kohistan/Vol-II/851 dated 18/6/2008 on the subject noted above and to clarify that all the Class-IV Fixed Pay Employees have been regularized in BPS-1 giving them the status of Civil Servant, with effect from 1st July, 2008 (but not from the date of their appointments) as per provision of Section 19 of the Civil Servant Act, 1973 (read with Civil Servants(Amendment) Act, 2005). Under the Act ibid, these employees are entitled for Contributory Provident Fund (C.P. Fund) instead of Pension/Gratuity and G.P. Fund. Since length of service of the employees was at variance, therefore, in order to meet the demand of natural justice, fixation of pay has been allowed to them with effect from the dates of appointment bringing their salaries at par with the respective length of service. However, they shall not be entitled for arrears of pay and allowances as clarified in the instructions. So, it is confirmed that they are entitled for CP Fund instead of Pension/Gratuity and GP Fund, unless otherwise provided in the relevant Rules/Regulations.

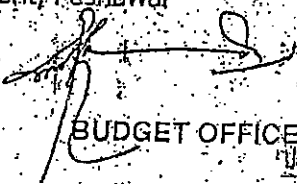
Yours faithfully,


Fida Muhammad)
Budget Officer-I

Endst.No. & Date even:

Copy is forwarded w/r to Finance Dept's circular letter No.B01/1-22/2007-08/FD dated 29/1/2008, for information & necessary action to:-

- 1) All Administrative Secretaries to Government of NWFP
- 2) Secretary to Governor, NWFP, Peshawar
- 3) Principal Secretary to Chief Minister, NWFP, Peshawar
- 4) All District Coordination Officers in NWFP
- 5) All Heads of Attached Departments in NWFP
- 6) The Registrar, Peshawar High Court, Peshawar
- 7) The Registrar, NWFP Service Tribunal, Peshawar
- 8) The Secretary Provincial Assembly, NWFP, Peshawar
- 9) The Secretary, Board of Revenue, NWFP, Peshawar
- 10) All District Accounts Officers in NWFP
- 11) All Budget/Section Officers in Finance Department, Peshawar


BUDGET OFFICER-I

8

Annex "C"

3

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name شیرداز حسن ✓

2. Race اسلام ✓

3. Residence غوره بالا خیل دکان بالا خیل قلعہ و علیہ علیہ بنگالہ

Pass # 170 068

4. Father's name and residence عزیز سخاں

5. Date of birth by Christian era as nearly as can be ascertained 4/12/1952 ✓ چار دسمبر 1952ء

6. Exact height by measurement 5-6 ✓

7. Personal marks for identification بائیں ہاتھ نوکریں نازم

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. شیرداز حسن

10. Signature and designation of the Head of the Office or other Attesting Officer. Public Health Engineering Sub Division Bannu

Executive Engineer Public Health Engg. Division BANNU

488

Date

ation

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post.	Additional Pay for officiating	Other enrolment falling under the term "Pay"	Date of appointment	Signature of Government servant
<i>Operator</i> <i>1005-43-1650</i>	<i>Temp.</i>	<i>off. B.</i>		<i>1005/PM</i>		<i>21/7</i> <i>94</i> <i>(AM)</i>	
<i>Operator</i> <i>Contract Basis</i> <i>2040-85-4590</i> <i>(Revised pay scale</i> <i>NO. 4)</i>	<i>Temp.</i>	<i>Contract Basis</i>		<i>Rs. 2040+85=2125/</i> <i>PM</i>		<i>01/12</i> <i>2003</i> <i>PM</i>	
<i>do</i>	<i>do</i>	<i>do</i>		<i>Rs. 2210/</i> <i>PM</i>		<i>07/12</i> <i>2004</i> <i>PM</i>	

App

340

Signature of the Government servant in all columns

Serial No. of the entry

8	9	10	11	12	13	14	15	
Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period	Government to which debitable		
					<p>Appointed under contract basis as a P/operative, on roll: Kotla Mir Staff on S.P.S. No. 4 (1005-43-1650) vide Xerox PHE: Division Bannu no. 18-3/ E-16 on 19.9.94 & reported arrival 27/9/94.</p>			
					<p>Service for the period from 21-7-94 to 30-11-2001 verified from office copies of pay bills & acquit roll maintained in this office</p>			
					<p>Service verified for the period from 01/12/2001 to 30-11-2003 from the office copies of pay bills & acquitance roll maintained in this office</p>			
					<p>Service verified for the period from 01/12/2003 to 30-11-2004 from the office copies of pay bills & acquitance roll maintained in this office</p>			

①

Service for the period from 21-7-94 to 30-11-2001 verified from office copies of pay bills & acquit roll maintained in this office

Authy: Depy. Dy. Commr. Bannu
Finance Deptt. No. 502A-III
P/O/12-1/2004 dt 17-4-2004

30-11-2003 Annual Increment Granted
AN

30-11-2004 Annual Increment Granted
AN

Assistant District Officer, Works and Services (W.S&S) Bannu

Assistant District Officer, Works and Services (W.S&S) Bannu

Service verified for the period from 01/12/2003 to 30-11-2004 from the office copies of pay bills & acquitance roll maintained in this office

Assistant District Officer, Works and Services (W.S&S) Bannu

Assistant District Officer, Works and Services (W.S&S) Bannu

12/2003 EN

12/2004 EN

7	8	9	10	11	12	13		14	15
						Period	Government to which debit		
		Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
07/05			30/05	AN	<p>In pursuance of Secy. to Govt. of West. Provinces notification no. FD(P.R.) 11-1/105 dt. 09-07-05 pay fixed in revised B.P. 4032345-105345 w.e.f. 01-07-05</p> <p><i>[Signature]</i> Assistant District Officer Works & Services (W.S.S) Bannu.</p>		<p>Service for the period from 01-10-30¹¹ to 30-11-05 verified from office records.</p>		
12/05			30/05	AN	<p>Account Increment granted</p> <p><i>[Signature]</i> Assistant District Officer Works & Services (W.S.S) Bannu.</p>				
					<p>Ex-Post Facto sanction for renewal & extension of service from 01-10-30⁰⁶ granted vide DDO works & services (W.S.S) Bannu 00 no 210/E-16 dt. 23/06</p> <p><i>[Signature]</i> Assistant District Officer Works & Services (W.S.S) Bannu.</p>				
					<p>Deputy District Officer Works & Services (W.S.S) BANNU</p>				
12/06			30/06		<p>Annual increment granted</p> <p><i>[Signature]</i> Assistant District Officer Works & Service (Ws, & S) Bannu.</p>			<p>Service verified for the period from 27/11/2005 to 30-11-2006 from the office copies of pay bill & acquaintance roll maintained in this office</p> <p><i>[Signature]</i> Assistant District Officer Works & Service (Ws, & S) Bannu.</p>	

ATTESTED

خدمت کا سٹرنگ ہاجب محکمہ پبلک ہیلتھ سول سٹرنگ ہاجب ہٹاؤ

Anex D

(13)

دیپارٹمنٹل اپیل

من ایڈوانٹ محکمہ پبلک ہیلتھ سول میں بطور (Operator) مورخہ 19/07/1994 کو تعینات ہوا تھا اور سال 2008ء کو مستقل (Regularised) ہوا تھا۔ اور مورخہ 12/04/2012 کو محکمہ مذکورہ سے ساٹھ سالہ پر ریٹائرڈ ہوا۔ من ایڈوانٹ کے محکمہ مذکورہ میں تقریباً 17/18 سال ملازمت کی ہے۔ اور اپنی ڈیوٹی اس طریقے سے سرانجام دی تھی۔

گذا من ایڈوانٹ بمطابق 17/18 سال ملازمت تاریخ تعیناتی سے پنشن وغیرہ کا حقدار ہوں۔ گذا من ایڈوانٹ کو پنشن وغیرہ جاری کرنے کا حکم صادر فرمایا جائے۔

کیونکہ من ایڈوانٹ اب اس عمر میں کوئی کام کاج نہیں ہوں۔ چونکہ پنشن وغیرہ من ایڈوانٹ کا قانونی حق ہے۔ اس لئے عاثرتا ہوں کہ من ایڈوانٹ کو پنشن وغیرہ جاری کرنے کا حکم صادر فرمایا جائے۔

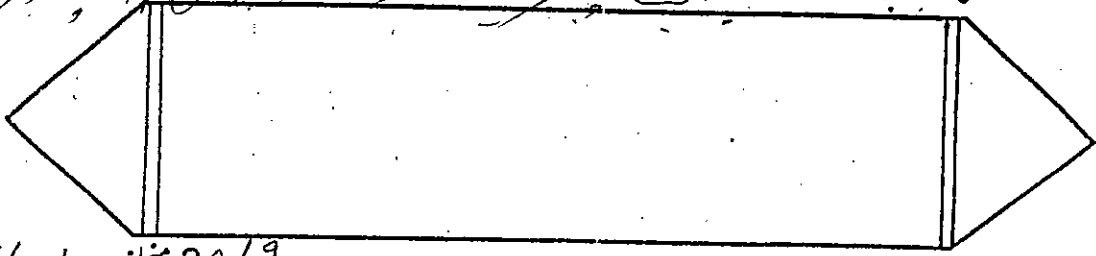
18/12/2018



شیرداد ولد عدت خان سندن غفار قلعہ غورہ بکاہیل تحصیل منہوں

ACCEPTED

بعد التضرار حتمی طور پر پیروی کا پابند



2019ء پنجاب اسمبلی

سید ارشد خان، بنام حکومت

سید ارشد خان

موزخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
 آن مقام سید ارشد خان کیلئے سید ارشد خان کے اصرار پر
 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 و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور صولی چیک دروپنیہ عرضی 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 اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پھر وکیل
 مذکور کریں۔ لہذا اذکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted
 Affidavit

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ماہ

المرقوم

واہ

کے لئے منظور ہے۔

بمقام

(سید ارشد خان)