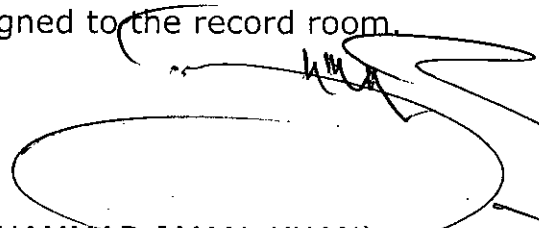


26.10.2020

Appellant is present in person. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Naseem Javed, Assistant Agriculture Officer are also present.

Appellant submitted application for withdrawal of the instant appeal for the reason that his claims with regard to correction of date of birth conjointly restoring him into service and payment of arrears accrued thereto have been fully satisfied, therefore, he submitted for withdrawal of the instant appeal. The contents of the application were reiterated to the appellant who admitted it correct. Accordingly, on the request of appellant and in view of satisfaction of his claims, the instant appeal stands dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED  
26.10.2020

  
(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT D.I.KHAN

24/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 20/4/2020 at Camp Court, D.I Khan

  
Reader

20/4/2020

Due to COVID-19 the case is adjourned. To come up for the same 21/9/2020 at Camp Court, D.I Khan

  
Reader

21.09.2020

Nemo for appellant.

Mr. Usman Ghani learned District Attorney alongwith Nasim Javid Assistant Agriculture Engineer for respondents present.

Written reply was not submitted. Representative of respondents requests for adjournment in order to submit reply. Opportunity is granted. To come up reply/comments on 26.10.2020 before S.B at Camp Court, D.I.Khan. Appellant be put notice.



(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan

گبدالت ضیاب - سپید بختونخواہ سروس ٹریننگ کلب  
کیمپ کوڈنگ ڈیپارٹمنٹ، کیمپل ضلع

صاف محمد الوصاب منام حکومتی سپید بختونخواہ ورگمنڈ

### سروس ایپل

درخواست میرا اجازت عطا فرمائی جانے  
بابت draw of fund کے لیے  
ایپل عنوان بلڈ

ضیاب عالی! ایپلانٹ حسب ذیل سرمن رساں ہے

(1) یہ کہ ایپل عنوان بلڈ زمرہ تجویز گبدالت حضور الفوری  
جسکی اصرورتاریخ پستی حضور ہے

(2) یہ کہ ایپلانٹ کی فوری سرمنی ہو چکی ہے کہ اس کے ایپلانٹ  
کا تاریخ پیدائش درست کر کے بقایا جات بھی ادا کر دیے  
ہیں کہ ایپلانٹ کو نوکری پر بحال بھی کر دیا ہے جس  
وجہ ایپلانٹ ایپل عنوان بلڈ کی سرمنی پوری نہیں کرنا چاہتا

لہذا اس کے درخواست حفا

منظور فرما کر ایپل عنوان بلڈ کو

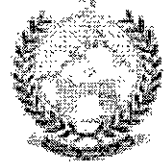
لجسٹریشن ڈیپارٹمنٹ داخل دفتر کیا گیا

تاریخ: 26/10/2020

صاف محمد الوصاب - ایپلانٹ

صاف محمد الوصاب

**Government of Khyber Pakhtunkhwa**  
**District Accounts Office D.I.Khan**  
**Monthly Salary Statement (July-2020)**



**Personal Information of Mr HAFIZ ABDUL WAHAB d/w/s of KARIM DAD**

Personnel Number: 00289206 CNIC: 1210221445773 NTN:  
 Date of Birth: 01.07.1962 Entry into Govt. Service: 17.11.1983 Length of Service: 36 Years 08 Months 016 Days

**Employment Category: Active Permanent**

Designation: 80001598-GOVERNMENT OF KHYBER PAKH

DDO Code: DI4213-ASSTT AGRI ENG FO DIKHAN

Payroll Section: 002 GPF Section: 010 Cash Center:

GPF A/C No: AGRI DIK 1540 Interest Applied: Yes **GPF Balance:** 169,362.00

Vendor Number: -

**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 08 Pay Stage: 28

Wage type	Amount	Wage type	Amount
0001 Basic Pay	30,140.00	1000 House Rent Allowance	1,650.00
1210 Convey Allowance 2005	1,932.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	674.00	2199 Adhoc Relief Allow @10%	467.00
2211 Adhoc Relief All 2016 10%	2,354.00	2224 Adhoc Relief All 2017 10%	3,014.00
2247 Adhoc Relief All 2018 10%	3,014.00	2264 Adhoc Relief All 2019 10%	3,014.00
5002 Adjustment House Rent	29,700.00	5011 Adj Conveyance Allowance	34,776.00
5012 Adjustment Medical All	27,000.00	5309 Adj. 15% Adhoc Allowance	12,132.00
5322 Adj Adhoc Relief All 2018	53,448.00	5336 Adj Adhoc Relief All 2019	32,819.00
5801 Adj Basic Pay	534,480.00	5964 Adj Adhoc Relief All 2015	8,406.00
5975 Adj Adhoc Relief All 2016	42,375.00	5990 Adj Adhoc Relief All 2017	53,448.00

**Deductions - General**

Wage type	Amount	Wage type	Amount
3008 GPF Subscription	-1,070.00	3501 Benevolent Fund	-600.00
3609 Income Tax	-4,181.00	4004 R. Benefits & Death Comp:	-690.00
6001 Adj Benevolent Fund	-10,800.00	6075 Adj GPF	-19,260.00
6217 Adj R. Ben & Death Comp:	-12,420.00		0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 50,169.10 Recovered till July-2020: 4,181.00 Exempted: 0.26- Recoverable: 45,988.36

**Gross Pay (Rs.): 876,343.00 Deductions: (Rs.): -49,021.00 Net Pay: (Rs.): 827,322.00**

Payee Name: HAFIZ ABDUL WAHAB

Account Number: 2673-2

Bank Details: NATIONAL BANK OF PAKISTAN, 230492 N.B.P KULACHI BRANCH KULACHI BRANCH DIKHAN, D.I.KHAN

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: DAO TANK

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:

**Government of Khyber Pakhtunkhwa**  
**District Accounts Office D.I.Khan**  
**Monthly Salary Statement (August-2020)**



**Personal Information of Mr HAFIZ ABDUL WAHAB d/w/s of KARIM DAD**

Personnel Number: 00289206      CNIC: 1210221445773      NTN:  
 Date of Birth: 01.07.1962      Entry into Govt. Service: 17.11.1983      Length of Service: 36 Years 09 Months 016 Days

**Employment Category: Active Permanent**

Designation: 80001598-GOVERNMENT OF KHYBER PAKH

DDO Code: DI4213-ASSTT AGRI ENG FO DIKHAN

Payroll Section: 002      GPF Section: 010      Cash Center:

GPF A/C No: AGRI DIK 1540      Interest Applied: Yes      **GPF Balance:** 170,432.00

Vendor Number: -

**Pay and Allowances:**      Pay scale: BPS For - 2017      Pay Scale Type: Civil      BPS: 08      Pay Stage: 28

Wage type		Amount	Wage type		Amount
0001	Basic Pay	30,140.00	1000	House Rent Allowance	1,650.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	674.00	2199	Adhoc Relief Allow @10%	467.00
2211	Adhoc Relief All 2016 10%	2,354.00	2224	Adhoc Relief All 2017 10%	3,014.00
2247	Adhoc Relief All 2018 10%	3,014.00	2264	Adhoc Relief All 2019 10%	3,014.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3008	GPF Subscription	-1,070.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-4,181.00	4004	R. Benefits & Death Comp:	-690.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 50,169.10      Recovered till August-2020: 8,362.00      Exempted: 0.30-      Recoverable: 41,807.40

**Gross Pay (Rs.): 47,759.00      Deductions: (Rs.): -6,541.00      Net Pay: (Rs.): 41,218.00**

Payee Name: HAFIZ ABDUL WAHAB

Account Number: 2673-2

Bank Details: NATIONAL BANK OF PAKISTAN, 230492 N.B.P KULACHI BRANCH KULACHI BRANCH DIKHAN, D.I.KHAN

**Leaves:**      Opening Balance:      Availed:      Earned:      Balance:

**Permanent Address:**

City: DAO TANK      Domicile: -      Housing Status: No Official

Temp. Address:

City:      Email:



www.agriengineering.kp.gov.pk  
DIRECTORATE OF  
AGRICULTURAL ENGINEERING,  
KHYBER PAKHTUNKHWA, TARNAB, PESHAWAR  
G.T. Road, Tarnab Peshawar  
& 091-2964063  
E-mail: daekpktarnab@gmail.com



No. 5161-71 /DAE/Estt: 3/120

dated Tarnab, the

01/06/2020

To

1. All Agricultural Engineers in Khyber Pakhtunkhwa.
2. All Asstt: Agricultural Engineers in Khyber Pakhtunkhwa.
3. Account Section of this office.

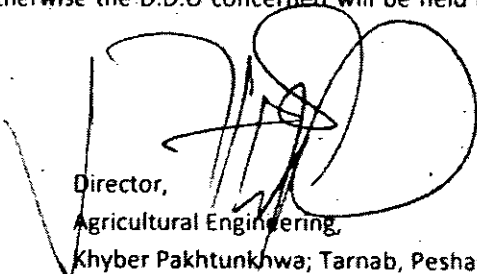
Subject: **ORDER/SANCTION TO CORRECTION IN DATE OF BIRTH.**

Memo:

Enclosed please find herewith a copy of Section Officer (Estt:), Government of Khyber Pakhtunkhwa, Agriculture, livestock and Cooperation Department Peshawar order No. SOE(AD)VI-106/2017/Engg: dated 29.05.2020 on the subject noted above (which is self-explanatory) for information and appropriate action.

You are further directed to avoid un-necessary correction/ insertion/ changes/ alteration etc. in the date of birth once recorded in the Service Books and also insure that such like cases may not be forwarded in future to this office; otherwise the D.D.O concerned will be held responsible for the consequences if any.

Encl: as above.


  
Director,  
Agricultural Engineering,  
Khyber Pakhtunkhwa; Tarnab, Peshawar

No. \_\_\_\_\_/DAE/Estt: 3/120

dated Tarnab, the

\_\_\_\_\_/\_\_\_\_\_/2020

Copy of the above is forwarded to the Section Officer (Estt:), Government of Khyber Pakhtunkhwa, Agriculture, livestock and Cooperation Department Peshawar with reference to his office order No. quoted above for information.

  
Director,  
Agricultural Engineering,  
Khyber Pakhtunkhwa; Tarnab, Peshawar



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
AGRICULTURE LIVESTOCK FISHERIES &  
COOPERATIVE DEPARTMENT**

Dated Peshawar, the 29<sup>th</sup> May, 2020

**ORDER**

**No. SOE(AD)/VI-106/2017/Engg:** The Competent Authority is pleased to accord sanction to correction in date of birth in light of the Enquiry Report and Medical Report in respect of the following officials:

S #	Name of Official with designation/EPS	Exact date of birth recorded in the service book	Recommended / Proposed dated of birth by the Enquiry Officers	Name of office
1.	Mr. Najm Ul Hassan, Assistant Mechanic Borer BS-05	18 years age (1960) on 21.03.1978	21.03.1960	Assistant Agricultural Engineer, D.I Khan
2.	Mr. Atta Ullah, Truck Cleaner BS-04	20.01.1974 recorded on 07.06.1992	20.01.1974	-do-
3.	Mr. Atta Ullah, Dozer Operator BS-07	1959 on 06.08.1979	01.07.1959	-do-
4.	Mr. Allah Nawaz, Dozer Operator BS-07	1971 (35 years) on 21.02.2006	01.07.1971	-do-
5.	Mr. Farz Abdul Wahab, Mechanic BS-08	1962 on 17.11.1983	01.07.1962 ✓	-do- ✓
6.	Mr. Abdul Jalil, Truck Driver BS-07	1963 on 23.04.1984	01.07.1963	-do-
7.	Mr. Abdur Razzaq, Dozer Operator BS-07.	1966 on 15.10.1984	01.07.1966	-do-
8.	Mr. Muhammad Iqbal, Mechanic BS-07	18 years age (1959) on 09.01.1978	09.01.1959	Assistant Agricultural Engineer, Peshawar
9.	Mr. Saifad Ullah, Dozer Operator BS-7	19 years age on 20.04.1977	12.11.1960	-do-
10.	Mr. Ghulam Hussain, Chowkidar BS-04	1964 on 01.11.1987	01.07.1964	Directorate
11.	Mr. Muhammad Ayaz, Dozer Operator BS-07	05.11.1961 on 06.04.1981	05.11.1961	Assistant Agricultural Engineer, Peshawar
12.	Mr. Muhammad Arif, Dozer Operator BS-07	1965 on 01.10.1984	01.07.1965	-do-
13.	Mr. Ihsan Ullah, Assistant Power Driller BS-08	19 year age on 06.02.1982	06.02.1963	-do-
14.	Mr. Jan Gul, Mechanic Borer BS-07	1962 on 01.03.1982	01.07.1962	-do-
15.	Mr. Naseer Ahmad, Mechanic Borer BS-07	19 age on 06.07.1982	06.07.1963	-do-
16.	Mr. Ghulam Hanif, Chowkidar BS-04	1965 on 05.05.1990	01.07.1965	-do-
17.	Mr. Abdul Munaf, Chowkidar BS-03	28.06.1982 on 01.07.2010	28.06.1982	-do-
18.	Mr. Muhammad Iqbal, Mechanic BS-07	1962 on 02.04.1985	02.04.1962	Assistant Agricultural Engineer, Bannu.
19.	Mr. Abdul Khaliq,	1962 on 01.08.1982	01.07.1962	-do-

S #	Name of Official with designation/BPS	Exact date of birth recorded in the service book	Recommended / Proposed dated of birth by the Enquiry Officers	Name of office
21	Mr. Shamshad Ahmad, Driver BS-07	19 years age on 11.08.1979	11.08.1960	Assistant Agricultural Engineer, Swat
22	Mr. Malik Muhammad Tahir, Dozer Operator BS-07	31.02.1961 on 01.05.1983	13.02.1961	Agricultural Engineer, Haripur
23	Mr. Masahib Hussain, Helper BS-04	1979 on 01.09.1979	01.07.1979	-do-
24	Mr. Zulfiqar Ahmed, Senior Clerk BS-14	08.02.1964 on 21.11.1989	08.02.1964	Assistant Agricultural Engineer, Mansehra
25	Mr. Zahir Gul, Dozer Operator BS-07	1962 on 05.07.1980	01.07.1962	Agricultural Engineer, Mardan
26	Mr. Muhammad Shah, Asstt. Mechanic Borer BS-05	06.05.1970 on 27.09.1988	06.05.1970	-do-
27	Mr. Hidayat Ullah, Dozer Operator BS-07	02.04.1964 on 26.04.1996	02.04.1964	-do-
28	Mr. Gul Habib, Driver BS-07	18.12.1968 on 02.03.1987	18.12.1968	-do-

**Sd/-**  
**Secretary Agriculture**

**Endst. of Even No. & Date.**

Copy forwarded to: -

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Agricultural Engineering, Khyber Pakhtunkhwa, Peshawar.
3. The District Accounts Officer, D.I Khan, Bannu, Swat, Haripur, Mansehra & Mardan.
4. The Assistant Agricultural Engineer, D.I Khan, Bannu, Swat, Haripur, Mansehra, Mardan & Peshawar.
5. P.S to Minister Agriculture Department.
6. P.S to Secretary Agriculture Department.
7. P.A to DS (Admn) Agriculture Department.
8. Official Concerned.
9. Master File.


  
SECTION OFFICER-ESTT:  
AGRICULTURE DEPARTMENT



29.01.2020

Appellant Hafiz Abdul Wahab in person present. Preliminary arguments heard. It was contended by the appellant that he was appointed as Cooli in Agriculture Department vide order dated 16.11.1983. It was further contended that after his appointment as per his medical certificate his date of birth was mentioned as 1962 and his service book was prepared and his date of birth was mentioned as 1962. It was further contended that later on some unknown person had mentioned his date of birth as 19.11.1958 at the side of his date of birth already mentioned as 1962. It was further contended that in this regard inquiry was also conducted and the inquiry officer concluded that the date of birth of the appellant may be considered as 01.07.1962. It was further contended that he also filed departmental appeal for correction of his date of birth as 1962 instead of 19.11.1958 but the same has not been decided so far. It was further contended that as per <sup>M</sup>his date of birth dated 19.11.1958 the date of his retirement come in 2018 while as per date of birth mentioned in the service book as 1962 his date of retirement come in the year 2022 but the respondent-department has neither corrected his date of birth as 1962 instead of 1958 nor has decided his departmental appeal even the appellant has been retired in the year 2018 on the basis of date of birth wrongly mentioned by someone as 19.11.1958, has stopped him from duty and has also not paid him any pensionary benefits, therefore, the respondent-department is bound to correct his date of birth as 1962 instead of 19.11.1958 and also allow the appellant to perform his duty. It was further contended that the respondent-department is also bound to pay salary for the period since 2018 till his joining duty.

The contention raised by the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 24.03.2020 before S.B at Camp Court D.I.Khan. The appellant has also submitted application for interim relief regarding release of his salary. Notice of the same be also issued to the respondents for the date fixed.

  
(M. Amin Khan Kundi)  
Member  
Camp Court D.I.Khan

Appellant Deposited  
Security & Process Fee

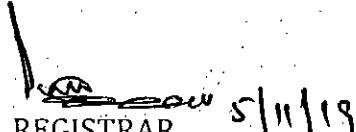


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Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 1489/2019 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2019	<p>The appeal of Hafiz Abdul Wahab received today by post Mr. through Muhammad Mohsin Ali 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 5/11/19</p>
2-	15-11-2019	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>27-11-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
27.11.2019		<p>None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance and preliminary arguments for 29.01.2020 before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court D.I.Khan</p>

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

Appeal No. 1489 /2019

Hafiz Abdul Wahab

.....APPELLANT

**VERSUS**

Govt. of K.P.K and others

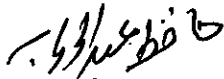
.....RESPONDENTS


**INDEX**

S #	Description of Documents	Annexure	Page #
1	Grounds of Appeal alongwith C.M and Memo of Addresses	-----	1-7
2	Copy of appointment order alongwith Medical Certificate and service Book	A	8-14
3	Copy of Inquiry Report	B	15-22
4	Copy of Appeal	C	23
5	Vakalatnama	-----	24

Dated: 29 /10/2019

**Humble Appellant**

  
Hafiz Abdul Wahab  
Through Counsel

  
**Muhammad Mohsin Ali**  
Advocate High Court,  
District Bar, D.I.Khan.  
**(0336-7969883)**

①

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

Appeal No. 1489 /2019

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1565

Dated 5/11/2019

Hafiz Abdul Wahab son of Karim Dad resident of Muhallah Behlool-Khel,  
Kulachi, District Dera Ismail Khan. (Mechanic BPS-08 office of Assistant  
Agricultural Engineer, Dera Ismail Khan)

.....APPELLANT

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa through Secretary Agriculture, Livestock and Coop: Department, Govt. Of Khyber Pakhtunkhwa, Peshawar.
2. Secretary Agriculture, Livestock and Coop: Department, Govt. Of Khyber Pakhtunkhwa, Peshawar.
3. Director Agricultural Engineering, Govt. of K.P.K, Peshawar.
4. Assistant Agricultural Engineer, Dera Ismail Khan.
5. Account Officer, Dera Ismail Khan.

.....RESPONDENTS

Filed to-day

Registrar

5/11/19

-----  
**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA  
SERVICE TRIBUNALS ACT, 1974.**  
-----

**Respectfully sheweth:**

1. That the appellant was appointment as Quli (BPS-1) vide office order dated 16-11-1983 in Agriculture Department D.I.Khan. After appointment, the appellant was medically examined and medical

certificate was issued, thereafter, the appellant resumed the charge and his service book was also prepared. The date of birth of the appellant was mentioned as 1962 in Medical certificate and service book. Copy of appointment order alongwith medical certificate and service book of the appellant is enclosed as **Mark-A**.

2. That the appellant performed his duty with full of hard-work & honestly, in the year 2018 the appellant was posted in the office of Assistant Agricultural Engineer, Dera Ismail Khan as Mechanic (BPS-08). In the meantime, the Assistant Agricultural Engineer, Dera Ismail Khan restrained the appellant from performing his duties due to the reason that the date of birth of appellant had been tampered in service book from 1962 to 19-11-1958, therefore, the monthly salary of the appellant has also been stopped. The date of birth of some-other employees of the department had also been altered in service book, thereafter, the department conducted the inquiry and it was found that it was a mistake and recommended that the date of birth of the appellant may be considered as 01-07-1962. Copy of inquiry report is enclosed as **Mark-B**.

3. That as per the date of birth of the appellant recorded at the time of appointment and as per recommendation of inquiry officer, the appellant will be retired in the year 2022 after attaining the age of superannuation i.e. 60 years. Therefore, the appellant is entitled for resuming the charge and to receive the monthly salary but the respondents did not paid any heed. Thereafter, the appellant filed the departmental appeal on 15-07-2019 to authority but the same

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was not decided, hence the instant appeal. Copy of appeal is enclosed as **Mark-C**:

*Being aggrieved, the appellant filling the instant appeal, inter alia, on the following grounds;*

**GROUNDS:**

- A. That, the act of the respondents while they restrained the appellant from performing the duty and stopped the salary of the appellant is totally against the law and rules.
  
- B. That the date of birth of the appellant is 1962 and the same was entered in Medical certificate and service book, but later-on the date of birth of the appellant was altered in service book and to that effect the proper inquiry was conducted. The appellant was not found guilty and the inquiry officer considered that the same was a mistake and recommended that the date of birth of the appellant may be considered as 01-07-1962. But the respondents willfully ignored the same, thus the instant appeal is liable to be accepted.
  
- C. That the malafide act of the respondents is apparent to the effect that they restrained the appellant from performing the duty and also stopped the monthly salary of the appellant.

D. That the counsel for the appellant may kindly be allowed to argue the additional grounds at the time of arguments.

It is, therefore, prayed that on acceptance of this appeal this Honourable Tribunal may be pleased be directed the respondents to allow the petitioner for performing his duty and also released his monthly salary alongwith arrears and also entered his date of birth in service book as recommended in the inquiry report or any other relief may being deems fit by this Honourable Tribunal in the interest of the appellant.

Dated: 29/10/2019

Humble Appellant

*[Signature]*

Hafiz Abdul Wahab  
Through Counsel

*[Signature]*

Muhammad Mohsin Ali  
Advocate High Court,  
District Bar, D.I.Khan.  
(0336-7969883)

AFFIDAVIT

-----

I, the appellant, do hereby solemnly affirm and declare on Oath that all the para-wise contents of this appeal are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable Tribunal.

*[Signature]*  
Identified by Counsel

*[Signature]*  
Deponent

*[Signature]*  
29/10/19



5

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

Appeal No. \_\_\_\_\_/2019

Hafiz Abdul Wahab

.....APPELLANT

**VERSUS**

Govt. of K.P.K and others

.....RESPONDENTS

-----  
**ADDRESSES OF THE PARTIES**  
-----

Hafiz Abdul Wahab son of Karim Dad resident of Muhallah Behloul-Khel,  
Kulachi, District Dera Ismail Khan. (Mechanic BPS-08 office of Assistant  
Agricultural Engineer, Dera Ismail Khan)


.....APPELLANT


- 
1. Govt. of Khyber Pakhtunkhwa through Secretary Agriculture, Livestock and Coop: Department, Govt. Of Khyber Pakhtunkhwa, Peshawar.
  2. Secretary Agriculture, Livestock and Coop: Department, Govt. Of Khyber Pakhtunkhwa, Peshawar.
  3. Director Agricultural Engineering, Govt. of K.P.K, Peshawar.
  4. Assistant Agricultural Engineer, Dera Ismail Khan.
  5. Account Officer, Dera Ismail Khan.

.....RESPONDENTS

Dated: 29/10/2019

**Humble Appellant**

  
Hafiz Abdul Wahab  
Through Counsel

  
**Muhammad Mohsin Ali**  
Advocate High Court,  
District Bar, D.I.Khan.  
**(0336-7969883)**



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

C.M No. \_\_\_\_\_/2019

In Appeal No. \_\_\_\_\_/2019

Hafiz Abdul Wahab

.....APPELLANT

**VERSUS**

Govt. of K.P.K and others

.....RESPONDENTS

**APPLICATION FOR INTERIM RELIEF TO DIRECT THE  
RESPONDENTS TO RELEASE THE MONTHLY SALARY OF THE  
APPELLANT TILL THE DISPOSAL OF ABOVE TITLED APPEAL.**

**Applicant Most Respectfully Sheweth,**

1. That the above titled appeal is filling today before this Honourable tribunal.
2. That the act of the respondents while they restrained the petitioner from performing the duty and stopped the salary of the petitioner is totally against the law and facts, due to which the present appellant is suffering a-lot.
3. That if during the pendency of instant appeal, the monthly salary of the petitioner is not released, then the appellant will suffer irreparable loss.
4. That this Honourable tribunal has got vast jurisdiction to entertain the instant petition.

It is, therefore, prayed that the instant petition may kindly be accepted.

Dated: \_\_\_/10/2019

Humble Petitioner

*Hafiz Abdul Wahab*  
Hafiz Abdul Wahab  
Through Counsel

*Muhammad Mohsin Ali*  
Muhammad Mohsin Ali  
Advocate High Court,  
District Bar, D.I.Khan.  
(0336-7969883)

AFFIDAVIT

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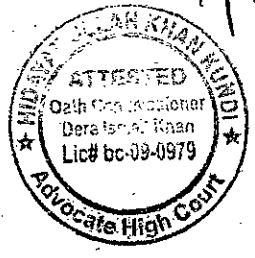
I, the appellant, do hereby solemnly affirm and declare on Oath that all the para-wise contents of this application are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable Tribunal.

*Attested*  
*[Signature]*

*[Signature]*  
Identified by Counsel

*[Signature]*  
Deponent

29/10/19



Official  
MSJ  
sh

The following posts provided  
S/Coolies in National Poultry  
undermentioned offices:

Transfers of the  
shop DIKhan  
with effect from the  
scale No. I (Rs. 4403/-) in the

1. Abdul Ghaffar s/o *Ban*
2. Hafiz Abdul Wahab s/o *Ban*
3. Ghulam Akbar s/o *Ban*
4. Muhammad Nawaz s/o *Ban*

*P. Chaudhary*  
of Chaudhary appointed as *Senior*  
in the office of the Asstt: Agril:  
Engineer (F.O) DIKhan.

Karim Dad Maulvi of Gulachi appointed as  
Skilled coolie in DIKhan workshop.

Lah Diwaya of Chah Ghulam Sarwar appointed  
as Skilled Coolie in DIKhan W/shop.

1. Their appointments and their services on reasons being assigned holding posts other than
2. In case they are necessary or in lieu
3. They will have their fitness from the
4. They will be governed by such rules and orders regarding leave

posts against the above posts are temporarily terminated without any notice and any respect of the fact that they were to which they were originally recruited. to resign fourteen days notice will be of fourteen days pay will be forfeited. produced medical fitness certificates of Medical Superintendent, DIKhan.

copy forwarded to:-  
1. A. Medical attendance etc; as may be issued by Government

5. In case he acts the posts on the above conditions he should report for duty the Asstt: Agril: Engineer (FO) DIKhan/ Superintendent workshop DIKhan.

Sd/- Malik Hidayatullah,  
Agricultural Engineer,  
DIKhan Division DIKhan.

NO. 7708-13 / AE

dated DIKhan the 16/11/1983.

1. All Concerned.
2. The Asstt. Agril: Engineer (F.O) DIKhan.
3. The Superintendent workshop, DIKhan. for information n/action.

Agricultural Engineer,  
DIKhan Division DIKhan.

*[Signature]*  
Agril Engineer  
(FO) DIKhan

ATTACHED ANNEX:-  
in Sub  
oh  
⑨

MEDICAL CERTIFICATE

Name of Official..... Mr. Hafiz Abdul Wahab.....

Caste or race..... S. Tantara.....

Father's name..... Mr. Karim Dad.....

Residence..... Village Bulroo. Kbs 1, Kulachi. Distt: D. I. Khan.....

Date of birth..... 1962.....

Exact height by measurement..... 5-40.....

Personal mark of identification..... A scar mark near the right eye.....

Signature of the Official..... *[Signature]*.....

Signature of head of office.....

*[Signature]*  
Seal of Office.....  
Asst. Agril Engineer  
D. I. Khan

I do hereby certify that I have examined Mr. Hafiz Abdul Wahab candidate  
employment in the Office of the... Agr. Cultural. Engineer, D. I. Khan.....  
and can not discover that head any disease communicable or other constitutional affic  
tion or bodily infirmity except *Nil*.....

I do not consider this as disqualification for employment in the office of the Agr. En  
..... His age according to his own statement..... 21..... year and by  
appearance about 25 (Twenty five) years.....



LEFT HAND THUMB AND FINGER  
IMPRESSIONS..... 19/11/1985

*[Signature]*  
Asstt Agril Engineer  
(FO) D.I. Khan

*[Signature]*  
Medical Superintendent,  
Civil Hospital, D. I. Khan.....  
D. I. Khan

(۲۰)

SERVICE BOOK

Attested  
M. Q. Khan

جلد ساز  
ماہنامہ  
گامی  
ڈیزائنر  
اسٹیشنر

سروس بک

مانے کا پتہ

بلوچ برادری - بازار کلاں - ڈیرہ اسماعیل خان

فون نمبر ۳۸۲۱

گومل آرٹ پریس

فون نمبر 3721

For use in Police Department only

Note: - The en

Heirs:

*Assessed*  
*M. Sub*  
*AK* (11)

1.  
2.  
3.  
Verification Roll No,                      dated                      received back

Left thumb-impression

- 1. Name
- 2. Race
- 3. Residence
- 4. Father's
- 5. Date of b  
as can be
- 6. Exact h
- 7. Person
- 8. Left ha  
(non-ga
- Little F
- Middle
- Thumb
- 9. Signat
- 10. Signa  
of the

Qualification	Date	Qualifications	Date
English	<i>TRIMBERY</i>	First Arts	
Pashtu		B.L. or B.A.	
Urdu		Pleadership examination,	
Plan-drawing		Traning School final examination	
Finger print		Other qualifications :-	
Drill instructing			
Court duties			
Reseve duties			

*19-11-83*  
*25*  
*19-11-58*

*Asstt Agri/Engineer  
(FO) D.I. Khan*

N.A. Alina to be drawn under qualification possessed.

Attested  
M. S. Khan (12)

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

- 1. Name ... HAFIZ ABDUL WAHAB
- 2. Race ... STANTARA
- 3. Residence ... VILLAGE BULROKHEL, TEHSIL KVLACHI DISTRICT DIKHAN
- 4. Father's name and residence ... KARIM DAD

5. Date of birth by Christian era as nearly as can be ascertained ... 1962. 19-11-1958

6. Exact height by measurement ... 5-4

Date

7. Personal marks for identification ... A SCAR MARK NEAR THE RIGHT EYE.

8. Left hand thumb & finger impression of (non-gazetted) office.

Little Finger. ... Ring Finger

Middle Finger. ... Foru Finger

Thumb ...

9. Signature of Government servant ...

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

1		3	4	5	6	7	8	
Name or Post	Whether substantive or officiating and Whether permanent or temporary	If officiating state-- (i) substantive appointment or (ii) whether service counts for pension under Act 371, C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emoluments falling under the term 'Pay'	Date of appointment	Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8-
RS- 4410-10-640								
Shankar Cooli	off Temp	-	-	4410/-	-	17-11-83	<i>[Signature]</i>	Asst. Agril.
<i>[scribble]</i>	<i>[scribble]</i>	-	-	450/-	-	1/3/84	<i>[Signature]</i>	Asst. Agril.
<i>[scribble]</i>	<i>[scribble]</i>	-	-	450/-	-	1/12/84	<i>[Signature]</i>	Asst. Agril.
<i>[scribble]</i>	<i>[scribble]</i>	-	-	460/-	-	12/85	<i>[Signature]</i>	Asst. Agril.
<i>[scribble]</i>	<i>[scribble]</i>	-	-	470/-	-	14/86	<i>[Signature]</i>	Asst. Agril. (F.O.) D.
P. 600-13-800								
Halpu L		-	-	639/-	-	1/8/85	<i>[Signature]</i>	Asst. Agril.
<i>[scribble]</i>	<i>[scribble]</i>	-	-	652/-	-	12/85	<i>[Signature]</i>	Asst. Agril. (F.O.) D.
<i>[scribble]</i>	<i>[scribble]</i>	-	-	665/-	-	12/88	<i>[Signature]</i>	Asst. Agril. (F.O.) D.

Asst. Agril. (F.O.) D. (P.O.) D. (F.O.) D.



(13)

Attested  
M. J. Khan

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

Name Hafiz Aledul Wahab

Race Stantard

Residence Village Bulroo Khel, Tehsil Kulachi Distt D.I.Khan

Father's name and residence Kasim Dad

Date of birth by Christian era or as nearly as can be ascertained 19-11-1958

Exact height by measurement 5-4

Personal make for identification A Scar mark near the right Eye

Left hand thumb and finger impression of ( Non Gazetted Officer )

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

*Attested*  
*[Signature]*  
Asstt Agril Engineer  
(FO) D.I.Khan

Signature of Government servant

Signature and designation of the Head of the office, or other Attesting officer.

Asstt Agril Engineer  
(FO) D.I.Khan







15 ATTENDED  
m. J. Khan

www.agriengineering.kp.gov.pk  
 DIRECTORATE OF  
 AGRICULTURAL ENGINEERING,  
 KHYBER PAKHTUNKHWA, TARNAB, PESHAWAR  
 G.T. Road, Tarnab Peshawar  
 Tel: 091-2964063  
 E-mail: daekpktarnab@gmail.com

No. 8630 /DAE/Estt: 3/120 dated Tarnab, the 31/10 /2018

The Assistant Agricultural Engineer,  
 Dera Ismail Khan.

Subject: OFFICE ORDER / INQUIRY.

Reference: This office endst: No.8400-01/DAE/Estt: 3/120 dated 18.10:2018.

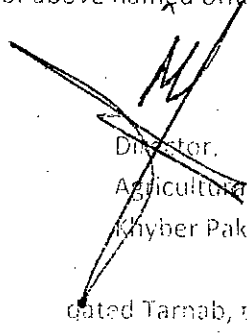
Memo:

Enclosed please find herewith the inquiry report conducted by Engr. Fakhar Uddin, Assistant Director Planning of this office vide his letter No. nil dated 23.10.2018, regarding curtling/over-writing in the date of birth in the Original Service Books of the following officials (which is self-explanatory) for information and appropriate action accordingly.

- 1- Mr. Najmul Hassan, Assistant Mechanic Borer.
- 2- Mr. Atta Ullah, Truck Cleaner.
- 3- Mr. Allah Nawaz, Dozer Greaser.
- 4- Mr. Abdur Razaq, Dozer Operator.
- 5- Mr. Atta Ullah, Dozer Operator.
- 6- Mr. Abdul Jalil, Driver.
- 7- Hafiz Abdul Wahab, Mechanic.


Original Service Books of above named officials are enclosed herewith.

Such as above

  
 Director,  
 Agricultural Engineering,  
 Khyber Pakhtunkhwa, Tarnab, Peshawar.

No. \_\_\_\_\_ /DAE/Estt: /3/120 dated Tarnab, the \_\_\_\_\_ / \_\_\_\_\_ /2018

Copy of the above is forwarded to Engr. Fakhar Uddin, Assistant Director Planning of this office for information with reference to his letter No: quoted above.

  
 Director,  
 Agricultural Engineering,  
 Khyber Pakhtunkhwa, Tarnab, Peshawar

DAE

dated Tarnab

the

2018

16

Approved  
M. S. Khan  
23/10/18

The Director,  
Agricultural Engineering,  
Khyber Pakhtunkhwa, Tarnab, Peshawar.

Subject: OFFICE ORDER/INQUIRY.

Reference: DAE letter No. 6599/DAE/Estt./E/2-A dated 18/10/2018.

Agency:

Enclosed please find herewith inquiry report along with seven (07) original service books regarding cutting/over writing and two date of birth for favour of further processing.

(Enc. as above)

20/Sept

Engr. Iskhayudin  
Inquiry Officer.

23/10/18

Supdt/ABR. Estt. ⇒ Inquiry 23/10/18

23/10

Estt. ABR

23/10

5137  
23-10-2018

(17) *Affixed*  
*in Sub*  
*etc*

INQUIRY REPORT:

INTRODUCTION:

The undersigned was appointed as an inquiry officer to probe in the cutting over-writing and two date of birth in the original Service Books of officials of the office of Assistant Agricultural Engineer Dera Ismail Khan vide Director Agricultural Engineering Khyber Pakhtunkhwa Endt. No 5400/5403/DAE/Estt/3/120 dated Tanab. the 5/7/2018.

FINDINGS AND DISCUSSIONS:

1. Mr. Najmul Hassan (AMB):

After thoroughly examining available documents i.e. Service Book, Medical Certificate etc attached in the service book, it was found that:

Mr. Najmul Hassan was appointed as Driller Helper in office of Assistant Agricultural Engineer D.I.Khan on dated 20/03/1978. His date of joining service was 21/03/1978. His date of birth was initially recorded on first page of service book as 18 years (1960) and then was re-written as 21.03.1960 under proper attestation of Assistant Agricultural Engineer D.I.Khan.

Medical Certificate issued by MS (DHQ) Hospital D.I.Khan at the time of first appointment showing approximate age of Mr. Najmul Hassan AMB 18 years.

As per GFR 117 (2). If a Government Servant is only able to state his approximate age, his date of birth may be assumed to be the corresponding date after deducting the number of years representing his age from his date of appointment i.e. (21.03.1978-18=21.03.1960).

GFR 116 provides that the date of birth once recorded cannot be altered except in the case of clerical error, without the previous orders of the Local Administration.

The wrong entry of the date of birth in service book is inadvertently mistake; it was the responsibility of Head of office to record date of birth in service book to be determined as per procedure under para 117(2) of GFR:

2. Mr. Atta Ullah (Truck Cleaner):

After thoroughly examining available documents i.e. Service Book, Medical Certificate, Matriculation certificate etc attached in the service book, it was found that:

Mr. Atta ullah was appointed as Truck Cleaner in office of Agricultural Engineer D.I.Khan Division D.I.Khan on dated 03/06/1992. His date of joining service was 07/06/1992. His date of birth at the time of entering into service was recorded in his service book and then was tempered/over written by Assistant Agricultural Engineer Swat and was recorded as 20/01/1974 under proper attestation.

Medical Certificate issued by MS Civil Hospital D.I.Khan at the time of first appointment clearly showing date of birth of Mr. Atta ullah as 20.01.1974 by his own statement. Matriculation certificate issued by BISE Bannu also showing his date of birth as 20.01.1974.

Establishment Department letter No. SOR.II(S&GAD)5(40)/87, dated 15th February, 1989 provides that all concerned may please be informed in clear terms that in future a request for an alteration in the recorded date of birth of a Government servant may only be entertained by the

*P*

(18) *Attestation*  
*m. g. s. B*  
*edu*

Appointing Authority in the case of officers in BS-17 and above and by the Administrative Department in the case of civil servants in BS-16 and below, after special enquiry and only if the Government servant applies for it within two years from the date of his entry into Government service.

It is further found that the date of birth of Mr. Attaullah (Truck Cleaner) was wrongly entered in his service book by the concerned Head of office at the time of his appointment and then it was tempered/changed by Assistant Agricultural Engineer Swat which is not within prescribed time limit i.e. within two years from the date of appointment and without following prescribed procedure laid down by the government as the official was appointed on 03.06.1992 and was transferred to Assistant Agricultural Engineer Swat on 28.02.2006.

3 Mr. Attaullah (Dozer operator)

After thoroughly examining available documents i.e. Service Book, Medical Certificate etc attached in the service book, it was found that:

Mr. Atta ullah was appointed as Truck cleaner in office of Assistant Agricultural Engineer Tribal Area Tank (appointment date not known). His date of joining service was 06/08/1979. His date of birth at the time of entering into service was recorded in his service book as 1959 and then was tempered/over written by Assistant Agricultural Engineer (F.O) D.I.Khan. and was recorded as 06/08/1959 under proper attestation.

Medical Certificate issued by MS Civil Hospital D.I.Khan at the time of first appointment clearly showing date of birth of Mr. Atta ullah as 1959 by his own statement.

GFR 116 provides that the date of birth once recorded cannot be altered except in the case of clerical error, without the previous orders of the Local Administration.

GFR 117(1) also provides that if a Government servant is unable to state his exact date of birth but can state the year, or year and month of birth, the 1st July or the 16th of the month, respectively, may be treated as the date of his birth.

The wrong entry of the date of birth in service book is inadvertently mistake; it was the responsibility of Head of office to record date of birth in service book to be determined as per procedure under para 117(D) of GFR.

4 Mr. Allah Nawaz (Dozer Greaser)

After thoroughly examining available documents i.e. Service Book, Medical Certificate etc attached in the service book, it was found that:

Mr. Allah Nawaz was appointed as Dozer Greaser on fixed pay in office of Executive District Officer Agriculture D.I.Khan on dated 17/02/2006 and was regularized w.e.f 01.07.2009 under Khyber Pakhtunkhwa Regularization of Services Act, 2009 by Assistant Agricultural Engineer D.I.Khan. His date of joining service was 21/02/2006. His date of birth at the time of entering into service was recorded in his service book as 1971 (35Y) 21.02.71

Medical Certificate issued by MS (DHO) Hospital D.I.Khan at the time of first appointment clearly showing date of birth of Mr. Allah Nawaz as 1971 by his own statement.

*(Signature)*



(19) *Approved*  
*W. S. Khan*  
*AN*

GFR 117(1) provides that if a Government servant is unable to state his exact date of birth but can state the year, or year and month of birth, the 1st July or the 16th of the month, respectively, may be treated as the date of his birth.

The wrong entry of the date of birth in service book is inadvertently mistake; it was the responsibility of Head of office to record date of birth in service book to be determined as per procedure under para 117(1) of GFR.

5. Mr. Hafiz Abdul Wahab (Mechanic)

After thoroughly examining available documents i.e. Service Book, Medical Certificate etc attached in the service book, it was found that:

Mr. Hafiz Abdul Wahab was appointed as skilled cooli in office of Agricultural Engineer D.I.Khan Division D.I.Khan on dated 16/11/1983. His date of joining service was 17/11/1983. His date of birth at the time of entering into service was recorded in his service book as 1962 and then was tempered/over written by Assistant Agricultural Engineer (F.O) D.I.Khan and was recorded as 19-11-1958 under proper attestation.

Medical Certificate issued by MS Civil Hospital D.I.Khan at the time of first appointment clearly showing date of birth of Mr. Hafiz Abdul Wahab as 1962 by his own statement.

GFR 116 provides that the date of birth once recorded cannot be altered except in the case of clerical error, without the previous orders of the Local Administration.

GFR 117(1) provides that if a Government servant is unable to state his exact date of birth but can state the year, or year and month of birth, the 1st July or the 16th of the month, respectively, may be treated as the date of his birth.

The wrong entry of the date of birth in service book is inadvertently mistake; it was the responsibility of Head of office to record date of birth in service book to be determined as per procedure under para 117(1) of GFR.

6. Abdul Jalil Khan (Truck Driver):

After thoroughly examining available documents i.e. Service Book, Medical Certificate etc attached in the service book, it was found that:

Mr. Abdul Jalil was appointed as Helper in office of Assistant Agricultural Engineer (F.O) D.I.Khan on dated 23/04/1984. His date of joining service was 23/04/1984. His date of birth at the time of entering into service was recorded in his service book as 1963 and then was tempered/over written by Assistant Agricultural Engineer (F.O) D.I.Khan as 1964 (3 was changed to 4) and then was changed and recorded as 24/04/1964 under proper attestation.

Medical Certificate issued by MS Civil Hospital D.I.Khan at the time of first appointment clearly showing date of birth of Mr. Abdul Jalil as 1963 by his own statement.

GFR 116 provides that the date of birth once recorded cannot be altered except in the case of clerical error, without the previous orders of the Local Administration.

*P*

(20) Approved  
in Sub  
edu

GFR 117(1) provides that If a Government servant is unable to state his exact date of birth but can state the year, or year and month of birth, the 1st July or the 16th of the month, respectively, may be treated as the date of his birth.

The wrong entry of the date of birth in service book is inadvertently mistake; it was the responsibility of Head of office to record date of birth in service book to be determined as per procedure under para 117(1) of GFR.

7. Abdur Razzaq (Dozer Operator):

After thoroughly examining available documents i.e. Service Book, Medical Certificate etc attached in the service book, it was found that:

Mr. Abdur Razzaq was appointed as Dozer Greaser in office of Assistant Agricultural Engineer (F.O) D.I.Khan on dated 13/10/1984. His date of joining service was 15/10/1984. His date of birth at the time of entering into service was recorded in his service book as 1966 and then was tempered/Re-written by Assistant Agricultural Engineer (F.O) D.I.Khan and was recorded as 14/10/1965 under proper attestation.

Medical Certificate issued by MS Civil Hospital D.I.Khan at the time of first appointment clearly showing date of birth of Mr. Abdur Razzaq as 1966 by his own statement.

GFR 116 provides that the date of birth once recorded cannot be altered except in the case of clerical error, without the previous orders of the Local Administration.

GFR 117(1) provides that If a Government servant is unable to state his exact date of birth but can state the year, or year and month of birth, the 1st July or the 16th of the month, respectively, may be treated as the date of his birth.


The wrong entry of the date of birth in service book is inadvertently mistake; it was the responsibility of Head of office to record date of birth in service book to be determined as per procedure under para 117(1) of GFR.

*(Handwritten signature)*

RECOMMENDATIONS:

- (21) ✓  
Approved  
on 28/11/2019  
edh
1. As per GFR 117(2), The date of birth of Mr. Najmul-Hassan (AMB) may be considered as 21.03.1960.
  2. The date of birth of Mr. Atta ullah may be considered as 20.01.1974.
  3. As per GFR 117(1), the date of birth of Mr. Attaullah (Dozer Operator) may be considered as 01.07.1959.
  4. As per GFR 117(1), the date of birth of Mr. Allah Nawaz (Dozer Greaser) may be considered as 01.07.1971.
  5. As per GFR 117(1), the date of birth of Mr. Hafiz Abdul Wahab (Mechanic ) may be considered as 01.07.1962.
  6. As per GFR 117(1), the date of birth of Mr. Abdul Jalil (Truck Driver ) may be considered as 01.07.1963.
  7. As per GFR 117(1), the date of birth of Mr. Abdur Razzaq (Dozer Operator) may be considered as 01.07.1966.

These correction in the date of birth may be considered valid on humanitarian basis as most of them are near to superannuation and to avoid the low paid government servants from further hardship at this stage.

  
Engr. Fakhar-u-din,  
Inquiry Officer.



Directorate of  
Agriculture Engineering

**GOVERNMENT OF KHYBER PAKHTUNKHWA**

OFFICE OF ASSISTANT AGRICULTURAL ENGINEER  
AGRICULTURAL ENGINEERING WORK SHOP BANNU ROAD D.I.KHAN  
PHONE & FAX No. 0966852605 & E-Mail: [aaedikhan@gmail.com](mailto:aaedikhan@gmail.com)



No. 2275 /AAE(F.O) Dated D.I.Khan the 20/11 /2018

The Director,  
Agricultural Engineering,  
Khyber Pakhtunkhwa  
Tarnab Peshawar.

Subject: OFFICE ORDER/ ENQUIRY

Reference: Reference this office letter No. 2003/AAE(F.O) dated 11/10/2018, Sanction for retirement in respect of Hafiz Abdul Wahab Mechanic (BPS-08).

Memo:

As per enquiry report conducted by Mr. Fakhar ud din Assistant Director Planning, office of DAE KPK Tarnab Peshawar vide his letter No. Nil dated 23/10/2018 followed by DAE, latter No. 8630/DAE/Estt: 3/120 dated 31/10/2018.

As per enquiry report of the officer of concerned the name of Hafiz Abdul Wahab Mechanic at S. No. 5, reveals that as per recommendation of the enquiry officer the exact date as per GFR-117(I) may be considered as on 1/07/1962.

Keeping in view the above recommendation of enquiry officer the exact date of birth of Mr. Abdul Wahab Mechanic is 01/07/1962 instead of 19/11/1958.

The case is therefore, forwarded to your good self for obtaining sanction of exact date of birth i.e 01/07/1962 from the higher authority. (Original Service Book of the above official along with the copy of enquiry report attached for reference)

خدمت خباب ڈی ایچ سی صاحب، ایڈیٹر گلبرگ انجینئرنگ

پتہ: پختونخواہ، پشاور

Amir  
Khan

عنوان : ایڈیٹر بابت حکم فرمایا جائے اسلئے  
ایڈیٹر گلبرگ انجینئرنگ ڈیڑھ ایپیل فن کو کہ وہ  
عن ایپیلانٹ کی تاریخ پیدائش 1962ء  
consider کرے بیوے عن ایپیلانٹ کو ڈیوٹی  
سے انجام دینے کے اور عن ایپیلانٹ کی تنخواہ  
بھی جاری کرے۔

خباب عالی! ایپیلانٹ حسب ذیل ضمنی مسائل لیے۔

1. یہ کہ عن ایپیلانٹ بیوے آفیس آرڈر ایف 13-7708 نورض  
16<sup>11</sup> 1983 حکم سے بطور قلمی تعینات ہووا۔ جو کہ بوقت تعیناتی  
عن ایپیلانٹ کا صدر کل بھی ہوا اور سروس بک بھی بنی۔ جو کہ  
صدر کل نے سٹیٹ لڈ سروس بک سے اس وقت عن ایپیلانٹ کی  
تاریخ پیدائش 1962ء متحدہ بیوروٹی۔ فقول لف سے۔

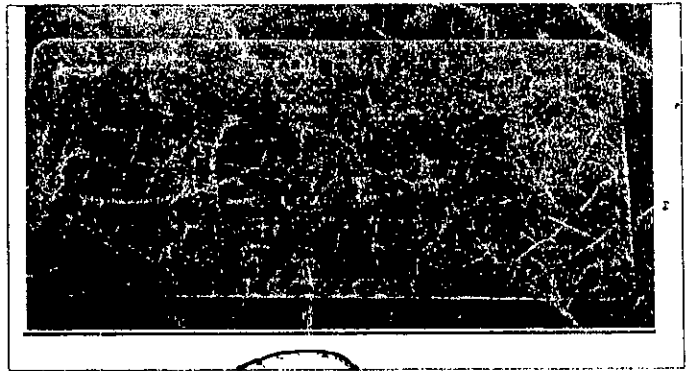
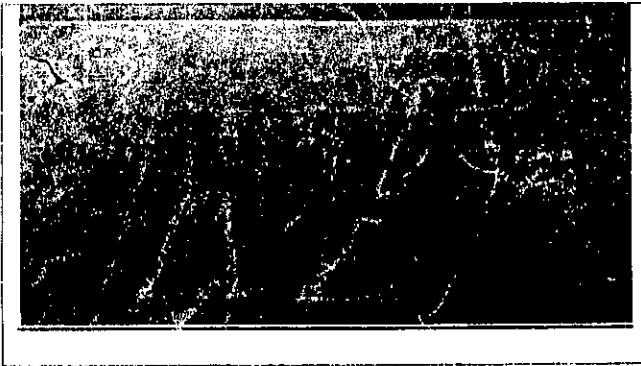
2. یہ کہ عن ایپیلانٹ حکم سے اپنے فرائض بخوبی سمجھتی رہا  
جو کہ سال 2018ء میں عن ایپیلانٹ بطور سکنڈ (BPS-08)  
اسٹنڈ ایڈیٹر گلبرگ انجینئرنگ ڈیڑھ ایپیل فن کے آفیس میں تعینات  
تھا تو عن ایپیلانٹ کو نومبر 2018ء میں ڈیوٹی کرنے سے  
روک دیا گیا اور عن ایپیلانٹ کی تنخواہ بھی بند کر دی گئی اور

جب عن ایپیلانٹ نے پتہ براری کی تو علم ہوا کہ عن ایپیلانٹ کی سروس  
 ٹیک میں کسی نے تاریخ پیدائش 1962ء کو سرکل کر کے الگ تاریخ  
 پیدائش 1958-11-19 تحریر کر دی اس لیے عن ایپیلانٹ کی تنخواہ بند  
 کر دی گئی جبکہ معائنہ 1962ء عن ایپیلانٹ کی تاریخ رہا کہ حسب معائنہ  
 60 سال 2022 بنتی ہے۔ اسی طرح دیگر ایپیلانٹ کی سروس  
 ٹیک میں تاہم تاریخ پیدائش ایسی ہی کٹنگ و منترہ کی گئی ہے۔ جس کی  
 نسبت حکم نے باقی عمر انکو سٹری کی اور انکو سٹری میں بھی یہ بات واضح  
 ہوئی کہ کسی نے غلط طریق سے تاریخ پیدائش میں دوسری تاریخ  
 پیدائش تحریر کر دی ہے اس لیے وہی تاریخ پیدائش درست تسلیم  
 کی جائے جو کہ ابتدا میں سروس ٹیک میں تحریر کی گئی تھی۔ مگر اس  
 کے باوجود بھی تا حال عن ایپیلانٹ کو اپنی ڈیوٹی نہیں کرنے دی جا  
 رہی اور نہ ہی تنخواہ جاری ہے۔ نفیاً لفظی ہے۔

لجنہ استعداء فقیر ایپیل فٹو اور فٹو کر اسٹنڈ انگریز لکھنؤ  
 انجینئر ڈیپو ایپیل خان کو حکم دیا جائے کہ وہ عن ایپیلانٹ کو  
 اپنی ڈیوٹی سرانجام دینے دے اور عن ایپیلانٹ کی تنخواہ  
 بھی جاری کرے اور باقیہ تنخواہ قبضہ و حاکم بھی ادا کرے۔  
 نوراہ: 15/7/2019

حافظ عبد الوہاب ولد کریم داد سنگھ محلہ سلولہ خیال مگدی  
 (کننگ راجی بی بی - 58) ضلع ڈیپو ایپیل خان

حافظ علی احمد



24

**VAKALATNAMA**

**IN THE COURT OF** S-T **, DERA ISMAIL KHAN.**

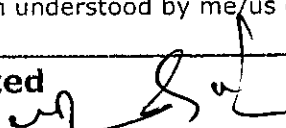
Hafiz Abdul Wahab Plaintiff /Appellant /Petitioner/Complainant/ Accused

Govt of KPK & others **Vs** Defendant /Respondent / Complainant/ Accused

KNOW ALL to whom these present shall come that I/We..... Petitioner do hereby appoint **Muhammad Mohsin Ali Advocate High Court** (herein after called the advocate/s) to be my/our Advocate in the above noted case authorise him:-

1. To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/us.
2. To sign, file, verify and present pleadings, appeals, cross-objections or petitions for executions review revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage.
3. To file and take back documents, to admit and/or deny the documents of opposite party.
4. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
5. To take execution proceedings.
6. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
7. To appoint and instruct any other Legal Practitioner authorising him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.
8. And I/We the undersigned do hereby agree to rectify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes.
9. And I/We undertake that I/We or my/our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.
10. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case.
11. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself.
12. And I/We the undersigned to hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/we hereby agree that once fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 29 day of oct 20 19

**Accepted**  
  
**Muhammad Mohsin Ali**  
Advocate High Court  
District Bar, Dera Ismail Khan.

