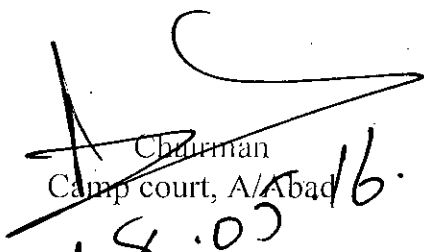


18.5.2016

Counsel for the appellant present. During the course of arguments, learned counsel for the appellant requested for withdrawal of the appeal as proper departmental appeal for redressal of grievances of the appellant was yet to be preferred before the appellate authority.

Dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
18.05.2016

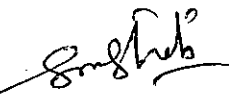


Chairman
Camp court, A/Abad

18.05.16

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 406/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18.04.2016	<p>The appeal of Mr. Pir Khan resubmitted today by Post through Mr. Sajad Sawar 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 Touring S. Bench at A.Abad for preliminary hearing to be put up thereon <u>18-05-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	2	25-04-2016

The appeal of Mr. Pir Khan son of Abdullah Khan Ex-Chowkidar GGPS Komaria Kuthiala Distt. A.Abad received to-day i.e. on 14.04.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Annexures-A and E of the appeal are illegible which may be replaced by legible/better one.
- 2- Annexures of the appeal may be attested.

No. 602 /S.T,

Dt. 14/4/2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sajad Sarwar Adv. A.Abad.

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 406/2016

MR PIR KHAN

Appellant

VS

GOVERNMENT OF K. P. K THROUGH SECRETARY (E & SE)
DEPTT: PESHAWAR & OTHERS

Respondents

SERVICVE APPEAL

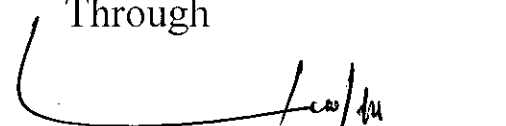
INDEX

S. #	Description	Annexure	Page No
1.	Para Wise Comments/reply & Affidavit		1-6
2.	Copy of appointment letter	"A"	7
3.	Copy of charge report	"B"	8 - 15
4.	Copy of notification	"C"	16
5.	Copy of Notification	"D"	17
6.	Letter of arrangements of pension paper	"E"	18
7.	Copy of departmental appeal	"F"	19
8.	Wakalatnama		20


..... APPELLANT

Dated 14/04/2016

Through


Sajad sarwar Advocate
High Court, Abbottabad.

Muhammad Ali Asif
Advocate Abbottabad.

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 406/2016

Pir Khan Son of Abdullah Khan, Ex Chowkidar GGPS Komaria
Kuthiala, Tehsil and District Abbottabad.

A.W.F. Province
Service Tribunal
Diary No 377
Dated 14-4-2016

.....APPELLANT

VS

1. Secretary Government of Education Khyber Pakhtunkhawa,
Peshawar.
2. Director Government of Education Department, Khyber
Pakhtunkhawa, Peshawar.
3. District Education Officer (Female) Abbottabad.
4. Sub-Divisional Education Officer (Female) Abbottabad.
5. District Account Officer, Abbottabad.

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974, AGAINST ILLEGAL DENIAL TO PAY PENSION AND GRATUITY OF THE APPELLANT AFTER RETIRING FROM THE SERVICE WITHOUT ANY REASON AND ORDER, WHICH IS LEGAL RIGHT OF APPELLANT.

PRAYER: ON ACCEPTANCE OF THIS APPEAL, Honourable court May direct the respondents to Release PENSION, GRATUITY, other PENSIONARY BENEFITS, RETIREMENT ALLOWANCE, G.P FUND and other rights accrued to the appellant at the time retirement which are denied/stopped by the respondents without any lawful justification/reasons as per law.

Filed to the
Registrar
14/4/16.

Ke-submitted to-
and filed.
Registrar

Respectfully Sheweth:-

Brief facts of the appeal are as under: -

1. That the appellant denoted his land to the Education department and as remuneration the appellant was appointed in Education Department as Chowkidar on fixed pay basis vide order Endst: No 294-98/C-IV (A&T) dated A. Abad the 15/05/1995.

(Copy of appointment order is annexed as Annexure "A".)

2. That, the appellant after appointment assumed the charge of the post and continuously performed the duties to the satisfaction of his office.

Copy of charge report is annexed as Annexure "B".

3. That, subsequently government of Khyber Pakhtunkhawa issued Notification No B-01-1-22-8-2007 F-D dated 29-01-2008 vide which all Class – IV employees/ fixed pay declared Civil Servant in scale number-1 under Civil Servant Act, 1973.

(Copy of Notification is annexed as Annexure "C")

4. That, respondent department in compliance with the above mentioned Notification Service of the appellant was regularized

vide Notification No 1/5-B-FDA/1563-1743 dated 31-07-2007.

(Copy of Notification is annexed as annexure "D".)

5. That at the time of retirement on 30-06-2009 appellant approached the concern respondents for his pension benefits; they without issuing any order, denied the appellant for his pension benefits.

6. That, respondent No 4 vide his letter No 1658 dated Abbottabad, the 23-12-2013 to address the Head mistress Government Girls Primary School Kumharan, Circle Sherwan Abbottabad to arrangement of relevant document for procedure of Pension and gratuity.

(Copy of letter no.1668 dated Abbottabad 23.12.2013 is annexed as annexure "E")

7. That, in the compliance of the letter.No 1658 dated 23-12-2013, submitted all the relevant documents in time and filed departmental appeal, but respondent did not given any reply to appellant.

(Copy annexed as annexure "F")

8. That filed this appeal on following grounds:-

GRUNDS:-

- a. That, the act of the respondents regarding non- payment of pensionary benefits retirements allowance G.P Fund gratuity and other benefits to appellant is illegal, unlawful without jurisdiction, discriminatory, and against the pension rules and fundamental rights of the appellant, thus not sustainable and liable to be set-aside.

- b. That, the Government of Khyber Pakhtwankhwa already declared all fixed pay employees as Civil Servant under Civil Servant Act, 1973 therefore appellant is fully entitled for all pensionary benefits.

- c. That, the act of the respondents against the Article 4 and 25 of the constitution, thus not sustainable and liable to be set-aside.

- d. That, the appellant belongs to a very poor family and has no source of income, the life of the appellant and his family has become very miserable. And they are facing great hardships and difficulties in the present era of price hike.

- e. That, the impugned act of respondents is based on malafide on their part, as no law of the land permits the respondents to infringe the guaranteed rights accrued to the citizens of Islamic republic of Pakistan.
- f. That, the petitioner has brought a fit case for immediate indulgence of this Honorable tribunal, not only for the petitioner but also thousands of other such like persons.
- g. That, no other speedy adequate and efficacious remedy is available to the petitioner, except the present writ petition.
- h. That, the addresses of the parties have correctly been given at the heading of the petition.

It is therefore, respectfully prayed that on acceptance of this appeal, act of the respondent may graciously be set-aside to the extent of without pension and gratuity and declared non-payment of pensionary benefits, retirement allowance G.P Fund, gratuity is illegal, unlawful, discriminatory, without jurisdiction,

against the law, rules and fundamental rights of the appellant and respondents may be directed for payment of all pensionary benefits and others allowance of appellant in the interest of justice.

.....APPELLANT

Dated 14/04/2016

Through

[Handwritten Signature]

SAJAD SARWAR ADVOCATE
High Court, Abbottabad.

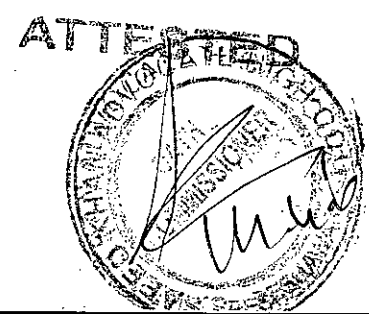
[Handwritten Signature]

MUHAMMAD ALI ASIF
Advocate Abbottabad.

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

.....APPELLANT.....



APPOINTMENT

Consequent upon the decision contained in the
 WPP Letter No. 21/2-1/97-98/1 dated 4.11.97 and
 Director Ed. WPP undated No. 150-3216/A-20/C-1V dated 1997
 The following candidate has hereby appointed on a fixed
 fixed term without any allowance etc on probationary
 effect from the date of taking over charge on the
 conditions given below:-

No.	Name of candidate & address	Name of school	Post	Agency
1.	Pir Khan S/O Abdullah Khan P/O Kumharan P.O. Sherwan Tehsil District Abdullah.	1073, Kumbakon	Headmaster	Agency

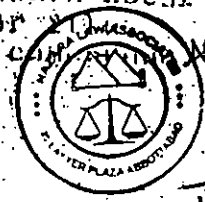
CONDITIONS:-

1. Charge report should be submitted to all concerned in triplicate.
2. No TA/DA is allowed on fresh appointment.
3. The candidate is required to produce domicile certificate from the P/W concerned & get it drawn until & unless he produces the same to the said officer.
4. The appointment of candidate purely on contract basis and liable to termination without notice and time without any time or on the expiry contract which will expire on commencement of vacation.
5. The candidate will execute agreement bond which the candidate that he shall abide himself under all the terms and conditions of contract appointment.
6. The appointment shall stand automatically cancelled if the candidate fail to join within 15 days of the issue of the order.
7. The Head of Institution is required and check original domicile certificate and constituency certificate and hand over charge.
8. The candidate may not be given the charge of the post if his age is below 18 years or exceeds 45 years.
9. The pay in r/o and domicile of the candidate should not be drawn until and unless they produce the same to the said officer.
10. The monthly wages of the given employee as per the scale under subject conditions and new pay band as per other for services rendered.

Order No. **294-98**

15/05/1995

1. To be submitted to the Director, Education, Government of Punjab, Lahore.
2. To be submitted to the District Education Officer, District Office, District Office.
3. To be submitted to the District Education Officer, District Office, District Office.
4. To be submitted to the District Education Officer, District Office, District Office.
5. To be submitted to the District Education Officer, District Office, District Office.



Muha
Asif
 Signature: *M. Asif*

Handwritten text at the top of the page, possibly a title or header, written in a stylized, cursive script.

"A"

Better Copy

OFFICE OF THE SUB DIVN EDUCATION OFFICER (F) SUB DIVN: A.ABAD

OFFICE ORDER NO. _____

DATED A. ABAD THE 15-05-1995

APPOINTMENT.

Consequent upon the decision contained in Govt: of NWFP Letter No. S. I/2-1/92-93/FD dated 4-11-92 endorsed vide Director Edu: NWFP endst: No 3152-3216/A-20/C-IV dated 26-11-92.

The following condition are hereby appointed Rs.1200/per month fixed without any allowances etc: on contract basis with effect from the date of taking over charge on the terms and conditions given below:-

S #	Name/Father's Name & address	Name of School	Post Against which apptt:	No & date under which has been sent: by the Government
1	Pir Khan S/O Abdullah khan R/O Kumahran P/O Sherwan The: & Ditt: Abbottabad.	GPS Kumahran	Chowkidar	Against newly created post

CONDITIONS:

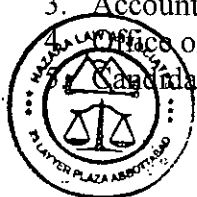
1. Charge report should be submitted to all concerned in duplicate.
2. NO Ta/A/DA is allowed on fresh appointment.
3. The Candidate is required to produce his age & health Certificate from the M/S concerned & no pay etc: shall be drawn until & unless he produces the above Certificate from the said officer.
4. The appointment of candidate purely on contract basis and liable to termination without without notice and reason at any time or on the expiry contract which will expire on commencement of vacation.
5. The candidate will execute agreement bond etc: to the effect that he shall aide himself under all the terms and conditions of contract appointment.
6. The appointment shall stand automatically cancelled if the candidate fails to join within 15 days of the issues of the order.
7. The Head of the Institution is required and checks original NIC, Domicile Certificate and constituency certificate before handing over charge.
8. The candidate may not be given charge of the post if his age is below 18 years or exceeds 45 years.
9. The Pay in r/o land donor/Nominees of land donors should not be drawn until and unless they produce registered mutation deed.
10. The monthly wages of the above employee will be debitable under object commodities and services 596000- payment to other for services rendered.

**SUB DIV: EDUCATION OFFICER (FEMLE)
ABBOTTABAD SUB DIV: A. ABAD.**

Endst: No 294-98/C -IV (A&T) Dated A. Abad the 15/05/1995

Copy for information & n/action to:

1. P.S to Director Elementary & Secondary Education NWFP.
2. District Education officer Abbottabad.
3. Account Branch local office.
4. Candidate concerned.



Muhammad Ali Asif
Advocate

**SUB DIV: EDUCATION OFFICER (FEMLE)
ABBOTTABAD SUB DIV: A. ABAD.**

Annexure B-8

حساب ال ریڈی ای او میں ...

حصوں کے خارجہ ریکورڈ

محکمہ جوڈیشل ...

کہ ...
 عدالت نے جوڈیشل ...
 C-IV (AVI) dated 11.11.15-5-95
 ... 16-5-95 ...
 ...

خارجہ ریکورڈ ...
 جوڈیشل ...
 ... 16-5-95 ...

...
 ...
 ...

Cham Bsi Bsi

Ali Asif



Muhammad Ali Asif

Advocate

Ali Asif

3 9

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

1. Name: Pir Khan

2. Race: _____

3. Residence: Village Amir Abad Plo Sherwan
Tehsil & District Abbottabad

4. Father's name and residence: Abdullah Khan

5. Date of birth by Christian era as nearly as can be ascertained: 1949

6. Exact height by measurement: 5'-5"

7. Personal marks for identification: _____

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

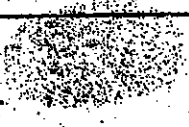
Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant: _____



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

[Signature]
By: Dist. Officer
(F) Primary Abbottabad

Muhammad
[Signature]

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 emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
Shah Kidar			BPS-01	(Rs: 1245-35-1770)			
S.G.P.S Kamran	off/Temp.		Rs: 1245 + PM			16 ⁰⁵ 1995	
-do-	-do-		Rs: 1280 + PM			1 ¹² 1995	
-do-	-do-		Rs: 1315 + PM			1 ¹² 1996	
-do-	-do-		Rs: 1350 + PM			1 ¹² 1997	
-do-	-do-		Rs: 1385 + PM			1 ¹² 1998	
-do-	-do-		Rs: 1420 + PM			1 ¹² 1999	
-do-	-do-		Rs: 1455 + PM			1 ¹² 2000	
-do-	-do-		Rs: 1490 + PM			1 ¹² 2001	
-do-	-do-		Scale Revised BPS-01	(Rs: 1870-55-3520)			
-do-	-do-		Rs: 2255 + PM			1 ¹² 2001	
-do-	-do-		Rs: 2310 + PM			1 ¹² 2002	



AGENT
Muhammad Ali Asif
Advocate
Scale Revised BPS-01

Signature of Government Servant.
Sigr of or
P.D.
Dy: P.
Pry:
P.C.
Dy: P.
Pry:

11

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or 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 debitible	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				Dy: D.O. (F) Pvy: A/Abd	30/11/1995		
Dy: D.O. (F) Pvy: A/Abd	30/11/1996	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	
Dy: D.O. (F) Pvy: A/Abd	30/11/1997	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	Exam. Certified From Acquittance Roll and Exam Record kept in this office 16-5-1995 to 30-11-2002
Dy: D.O. (F) Pvy: A/Abd	30/11/1998	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	
Dy: D.O. (F) Pvy: A/Abd	30/11/1999	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	Service regularised vide 01-07-2008 vide Govt. of NWFP no. 80-11/2007 dated 29-01-2008 / P.O. dated 29-01-2008
Dy: D.O. (F) Pvy: A/Abd	30/11/2000	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	S 427 6-9-2008
Dy: D.O. (F) Pvy: A/Abd	30/11/2001	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	5/9/9
Dy: D.O. (F) Pvy: A/Abd	1/12/2001	Scale Revised	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	T 261 T 6/19 Drawn pay 17/08 531/- amounting to 13970/- 2002
Dy: D.O. (F) Pvy: A/Abd	30/11/2002	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	
Dy: D.O. (F) Pvy: A/Abd	30/11/2003	A/Inc:	Dy: D.O. (F) Pvy: A/Abd			Dy: D.O. (F) Pvy: A/Abd	



Muhammad Ali Asif
 Advocate

(Handwritten signature)

121

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 emolument falling under the term "p"	Date of appointment	Signature of Government Servant
Chowkidar G.E.P.S Kamangan	Off Temp	BPS-01 (Rs: 1270-55-3520)				1-12-2003	
-do-	-do-		Rs: 2365/- PM			1-12-2003	
-do-	-do-		Rs: 2420/- PM			1-12-2004	
		Scale Revised BPS-01 (Rs: 2150-65-4100)					
-do-	-do-		Rs: 2200/- PM			01-07-2005	
-do-	-do-		Rs: 2265/- PM			01-12-2005	
-do-	-do-		Rs: 2930/- PM			1-12-2006	
		Scale Revised BPS-01 (Rs: 2175-75-4725)					
-do-	-do-		Rs: 3375/- PM			1-07-2007	
-do-	-do-		Rs: 3450/- PM			01-12-2007	
		Scale Revised BPS-01 (Rs: 2970-90-5670)					
-do-	-do-		Rs: 4140/- PM			01-07-2008	



Muhammad Ali Asif
Advocate

Muhammad Ali Asif

13

of servant.	9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or 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 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
	Dy. D.O. (F) Peshawar	30/11/2004					T 31.27 A-1-08 Make Rs 6678/- Pay out of Rs 10300/-		
		30/06/2005	Scale Revised						
		30/11/2005	A/Inc.						
		30/11/2006	A/Inc.						
	Dy: D.O. (F) Peshawar	30/06/2007	Scale Revised						
		30/11/2007	A/Inc.				2008 OFFICE OF THE ACCOUNTANT GENERAL NWFP PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES 1		
		30/06/2008	Scale Revised				OF RS 2970-90-5670 AT RS 4107 P.M.W.E With Next Increment on 1-07-2008 1-12-2008		
	Dy: D.O. (F) Peshawar								



Muhammad Ali Asif
Advocate

Muhammad Ali Asif

14

OFFICE OF THE MEDICAL SUPERINTENDENT DRQ HOSPITAL, ABBOTTABA-D.

HEALTH & AGE CERTIFICATE.

Name, Pir Khan F/Name, Abdullah Khan
Cast of Race, Tanali Height, 5-5 Date of Birth, 1948
Resident of, Kumrahrao P.O. Sherwan Tehsil Distt. Abbottabad
Mark of Identification, A scar on the R.H. cheek
Signature of Official, _____

I, do hereby certified that I have examined Mr. Pir Khan candidate for employment in the office of the chowkidar in the Education Deptt. and can not discover that he/she is any disease communicable or other constitutional affection or bodily infirmity except, None

I, do not consider this as disqualification for employment in the office of the chowkidar in the Education Deptt. and his/her age own statements 36 Years, and by appearance 36 Years.

Station, Abbottabad, LEFT/RIGHT HAND THUMB AND INDEX FINGER IMPRESSION.
Dated, 01/6/1993
Witnessed, Asif

Asif
Medical Superintendent,
DRQ Hospital, Abbottabad.

Attested



Muhammad Ali Asif
Advocate

Asif

15 جارج رپورٹ

تقدیر کیا جاتا ہے کہ جس پیرخانہ وود عبداللہ خان
سکول کھارواں نے تاریخ 16/1/1995 کو گورنمنٹ گنز پیر پور
سکول کھارواں میں اپنا جارج سمیٹا اور اپنی رولز
احسن طرز سے سرانجام دیا اور اسکول ویکارڈ میں
جس پیرخانہ وود عبداللہ خان 30/1/2009 تک اپنی رولز
پر فائز رہا اسلئے رپورٹ لکھی ہے

رہنما علی محمد

Principal
HEADMISTRESS
Govt Girls Primary School
KUMARAN ABBOTTABAD

Abbottabad



Muhammad Ali Asif

Advocate

Muhammad Ali Asif

Amman & Co.

18 16

حکومت صوبہ پشاور
محکمہ خزانہ

مراسلہ نمبر پی۔ او۔ اے۔ ۲۲/۲۰۰۸۔ ۲۰۰۷/۲۰۰۷ ایف۔ ڈی
تاریخہ ۲۹ جنوری، ۲۰۰۸ء

- ۱۔ تمام اتھارٹی مستندین حکومت صوبہ سرحد۔
- ۲۔ معتمد برائے گورنر صوبہ سرحد، پشاور۔
- ۳۔ پرنسپل سٹاف آفیسر برائے ڈیپارٹمنٹ صوبہ سرحد۔
- ۴۔ تمام سربراہان وقت آنکھ جات صوبہ سرحد۔
- ۵۔ تمام ضلعی رائیلہ افسران صوبہ سرحد۔
- ۶۔ رجسٹرار پشاور اور ہائی کورٹ، پشاور۔
- ۷۔ رجسٹرار، سرحدی ٹریبیونل، صوبہ سرحد، پشاور۔
- ۸۔ سیکرٹری، صوبائی بینک سرحد، پشاور۔
- ۹۔ سیکرٹری بورڈ آف ریونیو، صوبہ سرحد۔

بخدمت

Abdul Aziz Khan Tanoli
Advocate
District of Abbottabad

بجرت تقریر ۰۸۔ ۲۰۰۷ میں درجہ چہارم کے مقررہ تنخواہ پانے والے (Fixed pay)
ملازمین کے لیے کما کر پانے کا اعلان۔

عنوان:-
جناب عالی

مجھے ہدایت کی گئی ہے کہ عنوان بالا کا حوالہ دیتے ہوئے عرض کروں کہ صوبائی حکومت نے تمام درجہ
چہارم (مقررہ تنخواہ Fixed pay) پانے والے ملازمین کو یکم جولائی ۲۰۰۸ء سے این۔ ڈی۔ ایف۔ پی۔ سول
ملازمین ایکٹ ۱۹۷۳ء کے تحت سول ملازمین کا درجہ دیگر بنیادی سکیل (BPS-1) دینے کی منظوری دی
ہے۔

۲۔ مذکورہ ملازمین کی تنخواہوں کا تیس (Fixation of pay) ان کی بھرتی کے تاریخ (Date of
Appointment) سے کیا جائے گا تاہم یہ ملازمین تنخواہوں اور بلڈ ایسز وغیرہ کی مد میں کسی قسم کی بقایا
جات (arrears) کے حقدار نہیں ہوں گے۔

۳۔ اس سلسلے میں پہلے سے جاری شدہ تمام پالیسی ہدایات یکم جولائی ۲۰۰۸ء سے منسوخ تصور
ہوں گے۔

آپ کے مخلص
Ali Asif

Section Officer (Finance)
Finance, E&T Deptt.
Dairy No. ۸۰۱
Dist. Abbottabad



مستند (میرا خیال ہے)
شرافت خان ربانی

Muhammad Ali Asif
Advocate

ایم۔ اے۔ ایف۔ ڈی
کھال چوک لک روڈ ایف۔ ڈی

Ali Asif

W. J. W. W. W.

C.

19

19

Handwritten mark resembling 'D' with a flourish

Handwritten mark resembling 'A' inside a circle

Handwritten number '17' inside a circle

DISTRICT GOVERNMENT
FINANCE & PLANNING
DEPARTMENT
ABBOTTABAD

No.1 /S-B-FDA/ 17.62.11/13
Dated Abbottabad the 21 /07/2007

To: All the DDOs/DOs.

Subject: CONVERSION OF FIXED PAY POST INTO REGULAR.

Memo:

The Government of NWFP, vide their letter No.BO-1/1-22-2007-8/FD dated 29.01.2008 has converted all fixed pay posts into regular BPS-1 with effect from 01.07/2008 and all the employees appointed on fixed pay have accordingly been regularized (copy enclosed). The pay of all such employees shall be fixed from the date of appointment, however they will not be entitled to any arrear of pay or allowances etc.

You are requested to please ensure that Service Books of all such employees are prepared well in time and their revised pay is got fixed as on 1.12.2007 so that they could get the benefit with effect from 1.7.2008. The salary budget for 2008-2009 may be prepared according to the revised pay of all such employees.

Signature
Executive District Officer
Finance & Planning
Abbottabad

Endst No 1744

Copy to the District Coordination Officer, Abbottabad for information please.

Signature
Executive District Officer
Finance & Planning
Abbottabad

Signature
Abdul Aziz Khan Tanoli
Advocate
District Bar Abbottabad

Handwritten Urdu text



Muham. Ali Asif
Advocate

Signature

Through Representative

71

Handwritten scribbles

Handwritten scribbles

Annexure "E" 18

OFFICE OF THE DIVISIONAL EDUCATION OFFICER (F) ABBOTTABAD

No. 1658

Dated Abbottabad, the 23/12/2013.

The Head Teacher,
G.P.S. Kumharan
Circle Sherwan.

Subject: - ARRANGEMENT OF PENSION/GRATUITY ETC.

Memo:

One, Mr. Pir Khan S/O Abdullah Khan Chowkdar of your school, who has been retired from the service during the year, 2009 at the age of 60 years. Please contact with the said H.O. Chowkdar and may be asked to send the following documents to be undersigned so that his Pension etc etc Case could be proceeded to the Government.

DOCUMENTS:

1. Application.
2. NIC (Photostat)
3. Copy of First Appointment order.
4. 15/Book if any.

[Signature]
 Sub-Divisional Education Officer
 (Female) Abbottabad

Enclt. No. _____
Copy to: _____

The D/O (F) Abbottabad w/r to her office No. 8105
dt: 21-12-2013.

Honourable Mr. Inayatullah Khan
Divisional Officer, Government of Khyber Pakhtunkhwa
Govt. Of Khyber Pakhtunkhwa w/r to his
o. No. dt: 6-12-2013.

[Signature]
 Sub-Divisional Education Officer
 (Female) Abbottabad

D/O (F)

[Signature]


Muhammad Iqbal
 Assistant
[Signature]

18
E. J. BURNETT

-E Belloi copy

OFFICE OF THE SUB DIVN EDUCATION OFFICER (F) SUB DIVN: A.ABAD

NO: 1658

Dated Abbottabad, the 23/12/2013

To

The Head Teacher,
GGPS Kumharan
Circle Sherwan.

Subject: **ARRANGEMENT OF PENSION/GRATUITY**

Memo:

One Mr Pir Khan S/O Abdullh Ex-Chowkidar of your School, who has been retired from the service during the year 2009 at the age of 60 years. Please contact with the said Retd: Chowkidar and may be asked to send the following documents to the undersigned so that his Pension etc case could be proceeded to the Government.

Documents.

1. Application
2. NIC : (Photostat)
3. Copy of Fist appointment order.
4. S/Book if any.

**SUB DIV: EDUCATION OFFICER
(FEMLE) ABBOTTABAD**

Endst: No

Copy for information & n/action to:

1. The DEO (F) Abbottabad w/r to the office NO 3105 dt: 21-12-2013.
2. Honorable Haji Qulandar Khan Lodhi
Advisor to Chief Minister of the
Govt: of Khyber Pakhtunkhawa w/r to his
No. Nil dt: 6-12-2013.

Alland



**SUB DIV: EDUCATION OFFICER
(FEMLE) ABBOTTABAD**

Muhammad Ali Asif

Advocate

Muhammad Ali Asif

محفوظ جناب ڈی. ای. او (F) کے لئے تحریر - تعلیم ضلع ریسٹ آباد

گذشتہ حضرت عالیہ عہدہ سائل گورنمنٹ گریڈ ٹیچر ایس ٹی کے لئے
 مہاراج (ریسٹ آباد) سے 3009 سال 60 تک کے پیر ریٹائرڈ ہوئے۔
 سائل درجہ چھٹا ہے۔ 15 سال ملازمت کے بعد عارضی طور پر
 لیکن سائل کو کسی قسم کے واجبات نہیں ملے۔ سائل نے پہلے بھی لایٹ
 گوش ٹیچر ٹیچر کے درخواست اسٹریٹ میں جن کے جواب میں
 آج 1658 تاریخ 23/12/2013 جاری کیا گیا۔ سائل کے جواب میں
 ضروری کاغذات لف درخواست میں ضروری کارروائی فرما کر
 سکور فرمائیں۔

العارض
 محمد عابد اللہ ریٹائرڈ ٹیچر
 G.G.P.S. مہاراج (ریسٹ آباد)
 امرتسر، 03/07/2014

Forwarded with the request that the above mentioned is based on facts kindly be considered for my please.

Head Teacher
 G.G.P.S. Kumharan
 Circle Sherwan-ATD.
 03-07-2014

Muhammad Ali Asif
 Advocate
 H * [Signature]



19973

20

DBA No.	167
BC No.	1 0 4 2 4 5 7
Name of Advocate	سجاد کوزل

S.No _____



Head Clerk
District Bar Association
Abbotabad

وکالت نامہ

بعدات صاب سروس ٹریبونل سٹاور
 عنوان: پیسرفات
 منجانب: اپیلٹ
 نوعیت مقدمہ: پنشن
 باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی و چوہدری برائے پیشی یا تصفیہ مقدمہ بمقام ایسٹ آف آفیس کے لیے
 بھارت سروسز اور ولوں بالی ٹیبلٹ کے متعلق آفیسر ڈیوٹی
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے
 جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ
 سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے
 علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروڈ تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ
 سماعت ہونے پر یا بروڈ تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے
 کسی معاوضہ کے ادا کرنے یا بخاندہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختمہ صاحب موصوف
 مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے
 اور ہر قسم کے بیان دینے اور اس پر نمائش و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات
 از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
 موصوف کو بشرط ادا ہوگی علیحدہ مختانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے
 کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں
 وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف
 کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ
 کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔
 مورخہ: 22/03/2016
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

الحکم علیہ



11
 Advocate
 Advocate