


FORM OF ORDER SHEET

Court of _____

Appeal No. 549/2024

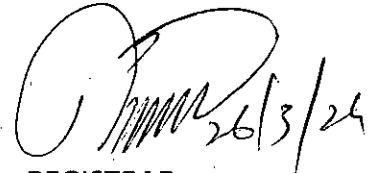
| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 16/04/2024 | <p>The appeal of Mr. Abdur Rehman resubmitted today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <i>18-04-2024</i>. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> |

The appeal of Mr. Abdur Rehman received today i.e on 25.03.2024 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellatant.
- ②- Departmental appeal having no date be dated.
- 3- The authority to whom the departmental appeal was made has not been arrayed/made a party.
- 4- Three copies/sets of the appeal along with annexures i.e. complete in respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 679 /S.T.

Dt. 26/3 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Umar Farooq Mohmand Adv.
High Court Peshawar.

R/Sir,

The mentioned objection were removed and after that the instant appeal Re-Submitted

9/4/2024



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 549 /2024

Mr. Abdur Rehman

..... APPELLANT

VERSUS

The DEO Swabi

..... RESPONDENT

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Dated:

APPELLANT

Through:


UMAR FAROOQ MOHMAND


WALEED ADNAN


MUHAMMAD AYUB
ADVOCATES HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 549 /2024

Mr. Abdur Rehman, PET BPS-15,
GHS Aladhair, District Swabi

.....APPELLANT

VERSUS

1. The Director Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. The District Education Officer, District Swabi

.....RESPONDENT

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENT BY NOT GRANTING/ALLOWING PAY PROTECTION/FIXATION TO THE APPELLANT W.E.F. 01/03/2016 I.E. FROM THE DATE OF INITIAL/FIRST APPOINTMENT AND AGAINST THE INACTION OF THE RESPONDED BY NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITH IN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the appellant may kindly be allowed/granted pay fixation w.e.f. 01/03/2016 i.e. from the date of initial/first appointment with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:-

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was initially appointed as SST (BPS-16) vide order dated 01/03/2016 after fulfilling all the codal formalities, and since appointment the appellant performing his duty quiet efficiently and to the entire satisfaction of their high ups. Copy of appointment order is attached as Annexure..... **A**
- 2- That it is important to mention here that during service of the appellant on the post of PET (BPS-15), the respondent again advertised the post of PET (BPS-15), whereby the appellant

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applied to the same through proper channel and after proper recommendation of the Departmental Selection Committee the appellant was appointed as PET (BPS-15) vide order dated 16/03/2017 and started performing his duties quite efficiently and to the entire satisfaction of his high ups. Copy of the 2nd appointment order is attached as annexure.....**B**

- 3- That the service of the appellant was regularized through Notification dated 26/02/2018 in pursuance to the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Service) Act, 2018. Copy of the Notification dated 26/02/2018 is attached as annexure.....**C**
- 4- That it is important to mention here that the respondent department granted /allowed pay protection to the other similar employes, furthermore this Honorable Tribunal also in Service Appeal No. 7364/2021 vide order dated 27/11/2023 allowed the appeal for similar relief. Copies of the Notification & order dated 27/11/2023 of this Honourable Tribunal are attached as annexure.....**D & E**
- 5- That feeling aggrieved from the inaction of the respondent by not allowing pay protection to the appellant, the appellant preferred Departmental Representation, but the same has not been decided till date. Copy of the representation/appeal is attached as annexure.....**F**
- 6- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds inter alia:-

GROUND:

- A- That the impugned the inaction of respondents by not allowing pay fixation and protection to the appellant w.e.f. initial appointment i.e. 01/03/2016 are against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. initial appointment i.e. 01/03/2016 and as such the inaction of the respondents is violative of law and rules.
- D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.
- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation w.e.f. 01/03/2016 the date of initial appointment but the same has not been done in case of appellant which is evident from the pay role of the appellant.
- F- That as per rule 2.3 of the West Pakistan Pension Rules, 1963 and FR 22 the appellant is fully entitled for the grant of pay fixation w.e.f. initial appointment with all back benefits.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: _____
 Through: **APPELLANT**
[Signature]
UMAR FAROOQ MOHMAND
WALED ADNAN *[Signature]*
MUHAMMAD AYUB *[Signature]*
 ADVOCATES HIGH COURT

AFFIDAVIT

I, Mr. Abdur Rehman, SST BPS-16, GHS Aladhair, District Swabi, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.

DEPONENT
[Signature]





-A(4)

DISTRICT EDUCATION OFFICE (MALE) SWABI
Office of the District Education Officer (Male) Swabi
Office No. 10, K. I. A. Road, Swabi, Sindh - 71300

APPOINTMENT OF PET (MALE).

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the posts of PET according to the non transferable school based policy in DPS 15, 16 & 17 of the District Swabi. Fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge i.e. 01.03.2016.

| Sr. | Name | Father's Name | Address | Score | Place of Posting |
|-----|----------------|------------------|---------|--------|---------------------------|
| 1 | Shahman Khan | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 2 | Rahman Khan | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 3 | Muhammad | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 4 | Saifullah Khan | Zahir Ullah Khan | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 5 | Muhammad | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 6 | Faizullah Khan | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 7 | Muhammad | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |
| 8 | Muhammad | Muhammad | Swabi | 100.00 | DPS, K. I. A. Road, Swabi |

Terms & Conditions

1. L.A.D.A. is not allowed to any one.
2. Charge reports should be submitted to office concerned.
3. Appointment is purely on temporary basis on contract basis with effect from the date of **ref. 01.03.2016 to 28.02.2017**.
4. He should not be handed over charge if he exceeds 55 years of age. In special relaxation case may be submitted to competent authority.
5. Appointment is subject to the condition that the certificate of appointment issued by the concerned authorities by the DDO (concerned), any irregularity and production of certificate will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's prior notice from either side or resignation without notice his one-monthly pay will be paid to him.
7. Pay will not be drawn until and unless a certificate of verification is issued by the concerned authority that his certificates are verified.
8. He should join his post within 15 days of the issuance of the certificate of appointment to join the post within 15 days of the issuance of the certificate of appointment. If he fails to do so, his appointment will expire automatically and no subsequent appeal etc. will be entertained.
9. Health and age certificate should be produced to the DDO (concerned) before taking over charge.
10. He will be governed by such rules and regulations as may be framed by the Government.
11. His services shall be terminated at any time, in case of non-performance during his contract period. In case of misconduct, he shall be liable to be punished as framed from time to time.
12. His appointment is made on school based. He will have to get a certificate of his service is not transferable to any other station.
13. Before handing over charge once again their documents may be checked for the required relevant qualifications, they may not be eligible for taking over charge.

11/11/2016 10:11:11 AM



DISTRICT EDUCATION OFFICER (MALE) SWAHILI

[Handwritten signature]

1. Director EKSIB Klyster Pabonokhwa, Peshawar.
2. District Accounts Officer, Swahili.
3. Principals/Head Masters concerned schools.
4. Official concerned.

Copy of the above is forwarded for information and written to these

Encl: No. 1960-3/2016 dated Swahili the 01.03.2016

(JEHAN MUHAMMAD)
DISTRICT EDUCATION OFFICER (MALE) SWAHILI

If any error wrong position holder candidate (having low score) was appointed erroneously, his appointment shall be cancelled any time in the best interest of the entitled right position holder candidate.

1005-02

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-B-6

DISTRICT EDUCATION OFFICE (MALE) SWABI
(Office phone & Fax No: 0938280230)

APPOINTMENT OF PET (MALE).

Consequent upon the recommendation of the Departmental Selection Committee appointment of the following candidates are hereby ordered against the posts of PET according to the non transferable school based policy in BPS-17 (R-1346/129-17119) & R-13519 fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge

| S# | Name | Father's Name | Address | Score | Place of Posting |
|----|----------------|-------------------|------------------------|--------|------------------|
| | Muhammad | | | | |
| 1 | Yaseen | Fida Muhammad | VPO Yaqoobi (Swabi) | 138.33 | GHS Hund |
| 2 | Arif Khan | Ghafoor Khan | VPO Pabaini (Swabi) | 131.71 | GHS Pabaini |
| 3 | Nasir Khan | Gul Muhammad | VPO Unwan Abad (Swabi) | 130.96 | GCMHS Marghar |
| 4 | Aamir Ali | Gul Roz Shah | VPO Zaida (Swabi) | 124.24 | GHS Marghar |
| 5 | Abdur Rahman | Ghani Ullah | VPO Sard Chota (Swabi) | 116.75 | GMS Aladher |
| 6 | Tasneem Ahmad | Fazle Wahab | VPO KSE (Swabi) | 116.50 | GMS Gar Munara |
| 7 | Fazal Shah | Khan Said | VPO Charbagh | 114.45 | GHS Mami |
| 8 | Qamar Alam | Shamsul Haq | VPO Sahar Khan (Swabi) | 111.37 | GHS Jhandi |
| 9 | Said Nabi Shah | Taj Muhammad Khan | VPO (G) Swabi | 109.17 | GMS Panawal |

Terms & Conditions

1. They should not be appointed over the age of 35 years as on the date of their appointment. Age relaxation case may be admitted as per Government rules.
2. Appointment is ordered with effect from 01.03.2017 to 28.02.2018.
3. They should not be appointed over the age of 35 years as on the date of their appointment. Age relaxation case may be admitted as per Government rules.
4. Appointment is subject to the condition that the certificate of appointment must be verified from the concerned authorities by the DDO concerned by means of a non-proprietary copy certificate will be reported to the law enforcement agencies for their reference.
5. Their services are liable to termination on one month's prior notice from either side in case of resignation without notice their one month pay allowance shall be payable as per Government rules.
6. If any candidate is dismissed or discharged or removed from the service by DDO, the candidate shall be liable to be re-employed as per Government rules.
7. The candidate shall be entitled to the 15 days of the absence of the certificate of appointment from the date of their appointment with the 15 days of the absence of the certificate of appointment from the date of their appointment as per Government rules.
8. Health certificate to be submitted to the Medical Superintendent, District Office, District Education Office, Swabi.
9. There will be no financial liability on the Government if any candidate is found to be ineligible by the Government.
10. Their services will be terminated if any candidate is found to be performing below the minimum level during their contract period. In case of misconduct, they should be proceeded under the rules framed by the Government.

POSTAL ADDRESS OFFICE
MADRAS

[Handwritten signature]

- 1. District Accounts Officer, Srirangapatna
- 2. District Accounts Officer, Srirangapatna
- 3. Principals/Head Masters, concerned schools
- 4. Officials concerned

Copy of the above is forwarded for information and in action to the -
District No. 51, Dated South the 16/12/2017.

POSTAL ADDRESS OFFICE
MADRAS

12. Their appointments are made on school based. They will have to serve at the places of posting and their services are not transferable to any other station.

13. Before handing over charge, their documents may be checked if they have not the required level and qualifications they may not be handed over charge. If any one wrong position holder candidate (having low score) was appointed, emergency, his appointment shall be cancelled any time in the best interest of the entitled right position holder candidate.

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C-8

DISTRICT EDUCATION OFFICE (MALE) SWABI
(Office phone & Fax No 0938280239, emis_swabi@yahoo.com)

Notification.

Under the provision of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Service) Act, 2018 (Khyber Pakhtunkhwa Act, No.1 of 2018), services of the following **PET** appointed on adhoc basis on Contract, are hereby regularized in **BPS-15**, on the same posts in Teaching Cadre on the terms and conditions given below with effect from the date of their appointment on the **PET** post.

| Sr | RollNo | Name | Address/CNIC No | Total Marks (out of 200) | School | Appointment order No and dated | Extension order No and dated if any |
|-----|------------|-------------------|-------------------------------------|--------------------------|-----------------|--------------------------------|-------------------------------------|
| 1. | 3120108 | Asif Khan | V&PO Kalu Khan 16202-6952405-5 | 118.34 | GMS Beka | 1876-G/9-5-2014 | 3981-85/20-05-2017 |
| 2. | 3120050 | Mashaq | V&PO Dagai 16202-8577732-5 | 116.42 | GMS Shalmani | 1876-G/9-5-2014 | 3981-85/20-05-2017 |
| 3. | 3120016 | Fazil Mugeem | V&PO KSK 42401-1737338-3 | 115.76 | GMS Dewal Ghari | 1876-G/9-5-2014 | 3981-85/20-05-2017 |
| 4. | 3120100 | Fazle Jawad | V&PO Turlandi 16202-4237971-9 | 112.99 | GHS Boga | 2017-G/19/05/2014 | 3981-85/20-05-2017 |
| 5. | 3120059 | Muhammad Tahir | VPO Gabasni 16202-6534078-5 | 122.63 | GMS Gandaf | 4395-98/21/3/2015 | 2863-69/15-4-2017 |
| 6. | 721500082 | Ibrahim Khan | VPO Dagi 16202-1450634-3 | 119.07 | GHS Malak Aba | 4395-98/21/3/2015 | 2863-69/15-4-2017 |
| 7. | 3120017 | Abrar Hussain | VPO Panjman 16202-0892220-5 | 116.93 | GHS Gajai | 4395-98/21/3/2015 | 2863-69/15-4-2017 |
| 8. | 721500053 | Khateeb ur Rahman | V&PO Jalsai 16201-2103661-5 | 113.66 | GMS Musa Banda | 1960-63/1-3-2016 | 1847-53/4-3-2017 |
| 9. | 721500071 | Saifullah Khan | V&PO Salim Khan 16202-1035652-7 | 104.68 | GHS Qadra | 1960-63/1-3-2016 | 1847-53/4-3-2017 |
| 10. | 721500109 | Waseem zahir khan | V&PO KSK 16202-2044092-3 | 104.65 | GHS Zarobi | 1960-63/1-3-2016 | 1847-53/4-3-2017 |
| 11. | 721500013 | Saeed Wahab | V&PO Maneri Bala 16202-3463299-7 | 103.25 | GMS Kola Gar | 1960-63/1-3-2016 | 1847-53/4-3-2017 |
| 12. | 721500077 | Haji Bahadar | VPO Ghani Chatra 42301-7976839-1 | 103.04 | GMS Sarkoi Bala | 1960-63/1-3-2016 | 1847-53/4-3-2017 |
| 13. | 721500017 | Maqsood Ali | VPO Saleem Khan 16202-4426375-7 | 102.52 | GMS Mangal chai | 1960-63/1-3-2016 | 1847-53/4-3-2017 |
| 14. | 721500025 | Syed Amir Shah | VPO Saleem Khan 16202-4218025-9 | 101 | GHSS Chanai | 3019-22/29-3-2016 | 1847-53/4-3-2017 |
| 15. | 7215000219 | Aamir Ali | V&PO Zaida 16202-3505841-3 | 124.24 | GHS Marghuz | 2128-31/16-3-2017 | |
| 16. | 7215000220 | Abdur Rahman | V&PO sard chena 16201-7569280-7 | 116.78 | GMS Ala Dher | 2128-31/16-3-2017 | |
| 17. | 7215000160 | Tasneem Ahmad | V&PO KSK 16202-8510178-3 | 116.5 | GHS Gar Munara | 2128-31/16-3-2017 | |
| 18. | 7215000264 | Fazal Shah | V&PO Charbagh 16202-7305001-1 | 114.45 | GHS Maini | 2128-31/16-3-2017 | |
| 19. | 7215000271 | Qamar Alam | V&PO Salim Khan 16202-8694895-3 | 111.37 | GHS Jhanda | 2128-31/16-3-2017 | |
| 20. | 7215000185 | Said Nabi Shah | V&PO Ulla 16202-5094161-9 | 109.47 | GMS Panawal | 2128-31/16-3-2017 | |
| 21. | 7215000226 | Hamid Ali | V&PO KSK 16202-0906149-1 | 107.47 | GHS Pabani | 4014-17/20-5-2017 | |

TERMS & CONDITIONS.

1. The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resign from service and also not for those who are under disciplinary proceedings.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. The employees whose services are regularized under the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the

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Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who in pursuance of the recommendation of the commission made before the commencement of this Act, are to be appointed to the respective service or cadre irrespective of their actual date of appointment.

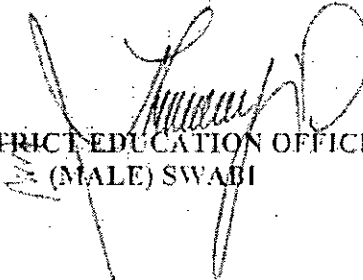
4. The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

(JEHANGIR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

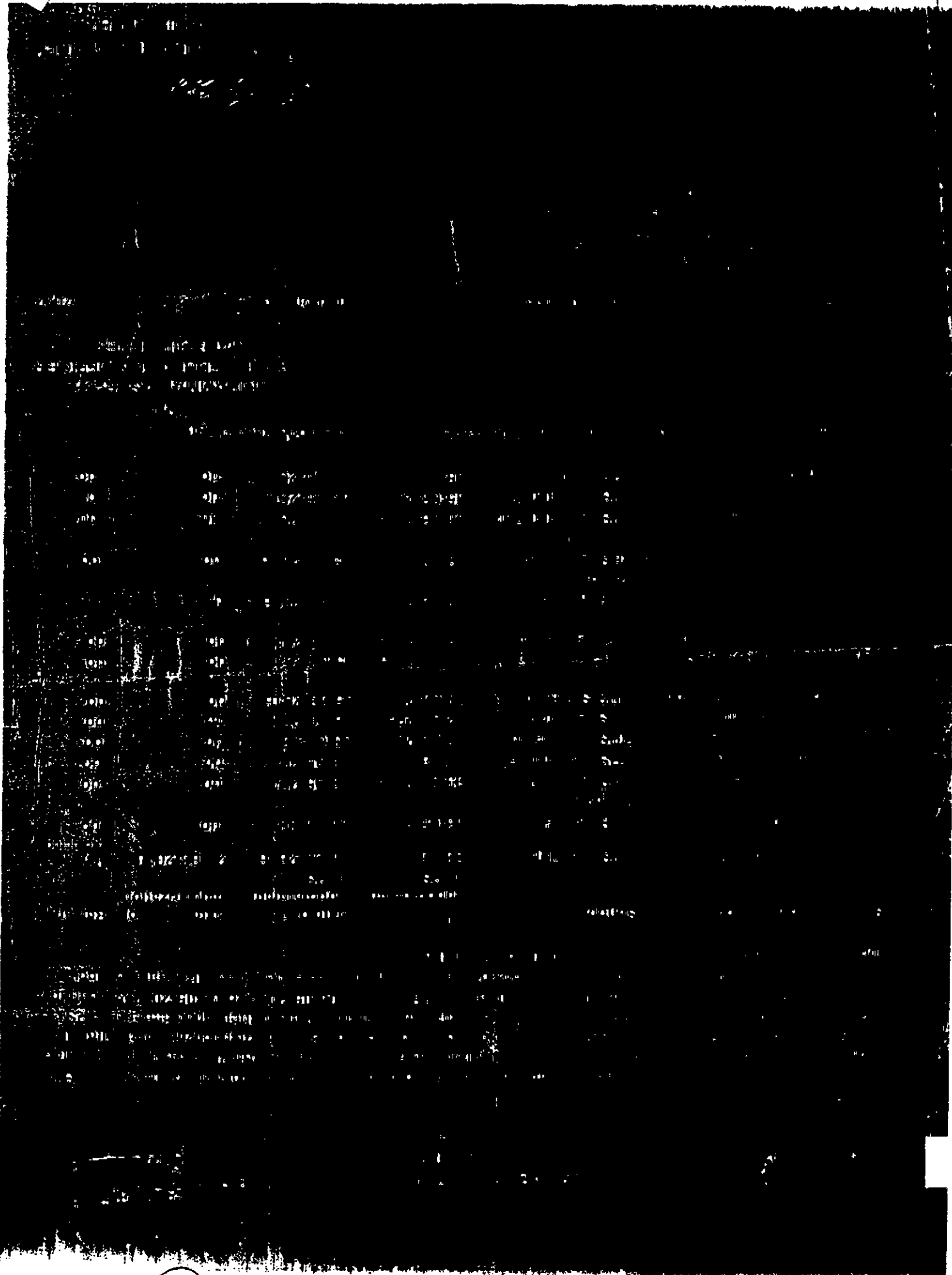
Endst: No. 1966-G /F.No. ___/Regul: of NTS Appt/dated Swabi the 26/2 /2018

Copy of the above is forwarded for information and necessary action to the:

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, Swabi.
3. Principals/Headmasters concerned schools.
4. Superintendents Local office.
5. Officials concerned.


DISTRICT EDUCATION OFFICER
(MALE) SWABI

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**OFFICE OF THE DISTRICT EDUCATION OFFICER
MALE DIR UPPER**

OFFICE ORDER.

I am directed to grant saction for protection of pay in respect of following PSTs Appointed on Adhoc basis vide this office Notification No.8572-79 Dated 03/05/2014.No.9411-14 Dated 04/0/2014 No.960/5 dated 12.03.2015, and No.313-18 dated 05.03.2016 respectively and after that regularized against PST post from the date of their initial appointment. Before their appointment as PSTs. They were Adhoc employees of Education Department as PST's w.e.f 03.05.2014 to 03.05.2017 without any break of service Hence, they are hereby considered as regular employees from the date of their 1st appointment with all benefit as admissible to them under the rules.

| S.# | Name & Designation | School | 1 st appointment as PST | Date of re-appointment as PST | Date regularization | Remarks |
|-----|---------------------|-------------------------|------------------------------------|-------------------------------|---------------------|---------------|
| 01 | Ismail Khan PST | GPS, Loi Bba | 03.05.2014 | 05.03.2016 | 21.03.2018 | Pay protected |
| 02 | Toti Rehman PST | GPS, Bin (P) Barawal | 03.05.2014 | 03.05.2017 | -do- | -do- |
| 03 | Irshad Ahmad PST | GPS Kass Chaper | 03.05.2014 | 03.05.2017 | -do- | -do- |
| 04 | Ayan Ullah PST | GPS, Umrilai (B) | 04.08.2014 | 03.05.2017 | -do- | -do- |
| 05 | Imran Ullah PST | GPS Chukiatan | 12.03.2015 | 03.05.2017 | -do- | -do- |
| 06 | Sher Rehman PST | GPS, Bekarey | 12.03.2015 | 03.05.2017 | -do- | -do- |
| 07 | Inayatur Rehman PST | GPS, S.S Khail | 12.03.2015 | 05.03.2016 | -do- | -do- |
| 08 | Ibrahim Khan PST | GPS Samai Viari | 12.03.2015 | 05.03.2016 | -do- | -do- |
| 09 | Muhammad Ilyas | GPS, Bin Berarai | 12.03.2015 | 03.05.2017 | -do- | -do- |
| 10 | Farhad Khan PST | GPS, Malook Banda | 12.03.2015 | 07.03.2016 | -do- | -do- |
| 11 | Majeed Ullah PST | GPS Gul Shai Dheri Wari | 12.03.2015 | 05.03.2016 | -do- | -do- |
| 12 | Dayeem Khan, PST | GPS Umrilai Bala | 06.03.2016 | 03.05.2017 | -do- | -do- |
| 13 | Fakhri Alam PST | GPS, Umrilai (P) | 06.03.2016 | 03.05.2017 | -do- | -do- |
| 14 | Rahat Khan PST | GPS, Kolkai | 06.03.2016 | 03.05.2017 | -do- | -do- |

Note: Necessary entry to this effect should be made in their service book accordingly.

-----SD-----

(MUHAMMAD ASHRAF)
DISTRICT EDUCATION OFFICER
MALE DIR UPPPER

No.7243-47/E.No.120/DEO(M)/Dir Upper

Dated Dir the 29/03/2022.

Copy forwarded to the:-

01. District Accounts Officer Dir Upper.
02. Sub Divisional Education Officer Male concerned.
03. EMIS Local office.
04. Official concerned.
05. Master File.

DY: DISTRICT EDUCATION OFFICER
MALE DIR UPPPER



(11)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Upper (Phone # 0944-881400) E-mail: deomdirupper@gmail.com

OFFICE ORDER.

Sanction for protection of pay in respect of the following Teachers, Under, Rule 10 (1) of pay revision rules and finance department letter No. FD (PRC): 1/97 Dated: 16/3/1999, & F.No.7(9)R-1/2012-Islamabad, the 31st May, 2013 Finance Division Regulations wing & F.No.7(9)R-1/2012-1388 dated 6th March, 2014, No FD.SGSR 2014 Peshawar dated 6th Feb; 2014 is crystal clear regarding the subject case; there is no break in their previous & current regular service then their pay are protected and previous services are automatically counted. They are hereby considered as regular employee from the date of their 1st initial appointment with all benefits as admissible under the rules.

| S. # | Name & Desig: | School | 1 st Appointment as | Date of appointment as | Regularized from | Remarks |
|------|-----------------------|-------------------|---|--|------------------|---------|
| 01 | Ala ur Rahman SST | GHS Shinkarl | SST-NO.3987, dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 02 | Umar Farooq SST | GCMHS Dir | SST-No.3987-93 dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 03 | Zia Ullah SST | GHS Warf | SST No.3987-93 dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 04 | Mohammad Ishfaq SST | GHS Ganshal | CT No.3367-74 dt.15-06-2015 | SST-No.2969-75 dt.13-04-2018 | 15-06-2015 | |
| 05 | Abdul Haseeb SST | GHS Warf | SST No.3987-93 dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 06 | Saim Ullah SST | GHS Karkabanj | SST No.3987-93 dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 07 | Syyed Gauhar Jamal CT | GMS Bandan | CT No.3367-74 dt.15-06-2015 | CT No.1698-1705 dt.28-03-2017 | 15-06-2015 | |
| 08 | Imran Khan SST | GHS Gandigar | PST No.8572-79 dt.03-05-2014 | SST-4100-06 dt.30-11-2015 | 03-05-2014 | |
| 09 | Sharif Ullah SST | GHS Sajgram | CT No.981-88 dt.12-03-2015 | SST-No.4878-84 dt.28-04-2017 | 12-03-2015 | |
| 10 | Syyed Faqal Ghani SST | GHS Barawal Bandl | SST No.4913-20 dt.30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 11 | Badshah Sardar SST | GCMHS Dir | CT No.8619-25 dt.03-05-2014 | SST-No.4878-84 dt.28-04-2017 | 03-05-2014 | |
| 12 | Saeedullah CT | GMS Kotkay | PST.No.968-75 dt.12-03-2015 | CT No.3876-83 dt.29-05-2017 | 12-03-2015 | |
| 13 | Asad Ullah CT | GMS Dam Jabbur | PST.No.434-40 dt.05-03-2016 | CT No.4643-50 dt.23-06-2017 | 05-03-2016 | |
| 14 | Mohibullah SST | GHS Darora | SST No.4913-20 dt.30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 15 | Alta-ur-Rahman SST | GHS Gansseer | SST No.4913-20 dt.30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 16 | Jamil Ullah SST | GHS Darora | SST No.4913-20 dt.30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 17 | Suhaib Ahmad SST | GHS Usharl | SST No.4913-20 dt.30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 18 | Haj Khan SST | GHS Bandl | SST No.2084-91 dated 30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 19 | Faqal Hayat SST | GHS Karkabanj | PST No.5030-35 dated 20-07-2011, SST No. 2084-91 dated 30-04-2014 | SST No.4875-84 dated 28-04-2017 | 30-04-2014 | |
| 20 | Shakiel Khan SST | GHS Shinkarl | PST No.4331-37 dated 17-11-2006, SST No. 2084-91 dated 30-04-2014 | SST No.4913-20 dated 28-04-2017 | 30-04-2014 | |
| 21 | Sardar Badshah CT | GHS Gansseer | PST No.8385-91 dated 24-05-2014, CT No.1698-1705 dated 28-03-2017 | CT No.1698-1705 dated 28-03-2017 | 24-05-2014 | |
| 22 | Gul Muhammad CT | GHS Karkabanj | PST No.5030-35 dated 20-07-2011, CT order No.8619-25 dated 03-05-2014 | CT No.206-46 dated 05-03-2016 | 03-05-2014 | |
| 23 | Ihsanullah CT | GMS Damjabbur | PST. Order No. 8572-79 dated 03-05-2014, CT No.3876-83 dated 29-05-2017 | CT Order No.3876-83 dated 29-05-2017 | 03-05-2014 | |
| 24 | Shahidullah CT | GHS Aghigram | PST Order No.8572-79 dated 03-05-2014 | CT Order No.1698-1705 dated 29-03-2017 | 03-05-2014 | |
| 25 | Alamgir Shah CT | GHS Darora | CT Order No.206-46 dated 05-03-2016 | CT Order No.4643-50 dated | 05-03-2016 | |

District Education Officer
Male Dir Upper

ATTACHED

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|----|---------------------|----------------|---------------------------------------|--|------------|
| 26 | Imamullah DM | GAIN Bilanzal | PST Order No.9411-14 dated 30-06-2014 | DM Order No.1468-73 dated 17-01-2018 | 30-06-2014 |
| 27 | Muhammad Shauib SST | GLISS Gamsceer | SST Order No.3987-93 dated 30-11-2015 | DM Order No.4878-84 dated 28-04-2017 | 30-11-2015 |
| 28 | Nahk Wali SST (IT) | GLIS Darara | CT order No.981-88 dated 12-03-2015 | SST IT No. PAI-IT/HA/SE/1-3-500-IT-A/ale /2016 | 12-03-2015 |
| 29 | Mohammad Tariq SST | GAIN Belanzal | PST order No.3030-33 dated 20-07-2011 | SST (G) order No.2084-91 dated 30-06-2014 | 20-07-2011 |

Note: Necessary entry to this effect should be made in their Service Books accordingly.

DISTRICT EDUCATION OFFICER (M)
DIR UPPER

Endst No. 1264-66 /F.No.52/DEO (M)/Estb (S)
Copy forwarder for information to the:-

Dated: 8/5/2019

- 01- District Accounts Officer Dir Upper.
- 02- Principal/Head Master concerned.
- 03- Official concerned.

DISTRICT EDUCATION OFFICER (M)
DIR UPPER

DEO (M) DIR UPPER

ATTACHED

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

☎ 0992 9310102, 0992 330131
 ✉ www.districteducation.gov.pk



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

In pursuance of Government of Khyber Pakhtunkhwa Primary & Secondary Education Department Notification No. SO/SI P/RSSE/D/3-2/2018/ST/197/2014 dated 06-02-2014 read with rule FR-22 (b) and in the light of Notification issued by the Director EA SED Khyber Pakhtunkhwa Peshawar vide No.6842-6942/R No.14/SST (A) Pay Protection dated 25-01-2019 Pay Protection towards their post/previous service rendered in respect of following SSTs is hereby allowed subject to the condition that there is no break/interruption between their previous to current regular service under Rule FR-23

| S. No | Name/Designation/School | 1st Appointment as | Date of Appointment as | Allowed Pay Protection |
|-------|-----------------------------|--------------------|--------------------------------------|------------------------|
| 1 | Mr. Saadque Hussain Shah | SST (B/C) vide | Endst No.3919 25 dated 30-11-2015 | 01-12-2015 |
| 2 | Mr. Muhammad Nisar | SST (B/C) vide | Endst No. 7579 7686 dated 30-11-2015 | 16-10-2014 |
| 3 | Mr. Muneez ul Haq | CT Vide | Endst No. 2907-12 dated 05-05-2014 | 06-05-2014 |
| 4 | Mr. Waheed Khan | SST (B/C) vide | Endst No. 3919 25 dated 30-11-2015 | 01-12-2015 |
| 5 | Mr. Muhammad Mohtasim | CT Vide | Endst No. 1854-60 dated 14-03-2015 | 16-03-2015 |
| 6 | Mr. Muhammad Anwar Abbasi | AT vide | Endst No. 3034-29 dated 25-04-2017 | 12-05-2011 |
| 7 | Mr. Muhammad Sajid | SST (B/C) vide | Endst No. 3919-25 dated 30-11-2015 | 01-12-2015 |
| 8 | Mr. Umar Farooq, SST (B/C) | CT Vide | Endst No. 1854-60 dated 14-03-2015 | 16-03-2015 |
| 9 | Mr. Zaug Akhla, SST (M/T) | SST (M/T) vide | Endst No. 4272 78 dated 25-04-2017 | 07-12-2014 |
| 10 | Mr. Waqar Gul, SST (G) GIS | CT Vide | Endst No. 2907 12 dated 05-05-2014 | 14-05-2014 |
| 11 | Mr. Farooq Waqar, SST (B/C) | SST (B/C) vide | Endst No. 3919 25 dated 30-11-2015 | 01-12-2015 |
| 12 | Mr. Muhammad Umar Javed | SST (B/C) vide | Endst No. 3919 25 dated 30-11-2015 | 01-12-2015 |

DISTRICT EDUCATION OFFICER (M) ABBOTTABAD

Order No. /SST/Pay Protection Dated 19-08-2020

Copy forwarded for information & necessary action to

- The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
- The District Accounts Officer, Abbottabad
- The Principals/Headmasters of concerned GIS/S/GHS

(Handwritten signature)

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD**0992-9310102, 0992-330131****ernisabbottabad@yahoo.com****GRANT OF PAY PROTECTION**

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S) F/E&SED/3-2/2018/SIT/ contract dated 16.02.2018 and Govt. of Finance Department Circular No. FD/(SOR-I) 12-7/2014 dated 06.02.2014 read with rule FR-22 (b) and in the light of Notification issued by the Director E&SED Khyber Pakhtunkhwa Peshawar vide No. 6842-6942/F.No.14/SST (M) Pay Protection dated 25-01-2019 Pay Protection towards their post/previous service rendered in respect of following SSTs is hereby allowed subject to the condition that there is no break/ interruption between their previous & current regular service under Rule FR-23.

| S.N o. | Name/Designation/School | 1 st Appointment as | Date of Appointment as | Allowed pay Protection w.e. from |
|--------|--|--|--|----------------------------------|
| 1. | Mr. Shafique Hussin Shah SST (B/C) GHS Bandi Dhundan Abbottabad | SST (B/C) vide Endst: No.3919-25 Dated 30-11-2015 | SST (B/C) Vide Endst: No. 2059-64 | 01-12-2015 |
| 2. | Mr. Muhammad Nisar SST (B/C) GHS Bakote Abbottabad. | 1 st Vide Endst: No. 7579-7686 Dated 15-10-2014 | SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017 | 16-10-2014 |
| 3. | Mr. Muneer-Ul-Haq SST (M/P) GHSS Nawanshehr Abbottabad | CT Vide Endst: No. 2907-12 Dated 25.04.2017 | SST (M/P) Vide Endst: No.4272-78 Dated 25.04.2017. | 06-05-2014 |
| 4. | Mr. Waseem Khan SST (B/C) GHSS Nawanshehr Abbottabad. | SST (B/C) Vide Endst: No.3919-25 Dated 30.11.2015 | SST (B/C) Vide Endst: No. 4272-78 Dated 25.04.217 | 01-12-2015 |
| 5. | Mr. Muhammad Mohtasim Afzal Abbasi SST (M/P) GHS Phallah Abbottabad. | CT Vide Endst: No. 1854-60 dated: 14.03.2015. | SST (M/P) Vide Endst: No. 4272-78 Dated 25.04.217 | 16-03-2015 |
| 6. | Hafiz Muhammad Amir abbasi SST (G) GHS Ghambeer Abbottabad. | AT Vide Endst: No. 3034-39 dated: 10.05.2014 | SST (G) Vide Endst: No. 4272-78 Dated 25.04.217 | 12-05-2014 |
| 7. | Mr. Muhammad Sajid SST (II/C) GHS No.3 Abbottabad | CT Vide Endst: No. 1854-60 dated: 14.03.2015. | SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017 | 01-12-2015 |
| 8. | Mr. Umer Farooq, SST (B/C) GHS Rajoya Abbottabad. | CT Vide Endst. No.1854-60 Dated 14.03.2015 | SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017 | 16-03-2015 |
| 9. | Mr. Zauq Akhtar, SST (M/P) GHS Rajoya Abbottabad. | SST (M/P) vide Endst: No. 3919-25 Dated 30.11.2015 | SST (M/P) Vide Endst: No.4272-78 Dated 25.04.2017. | 07-12-2015 |
| 10. | Mr. Waqar Gul, SST (G) GHS Sumandar Katha A/Abad. | CT Vide Endst: No. 2907-25 Dated 05.05.2014 | SST (G) Vide Endst: No. 4272-78 Dated 25.04.217 | 14-05-2014 |
| 11. | Chaudary Waqas, SST (B/C) GHSS Muslimabad A/Abad. | SST (B/C) vide Endst: No. 3919-25 Dated 30.11.2015 | SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017 | 01-12-2015 |
| 12. | Mr. Muhammad Umer Javed SST (II/C) GHS No.4 Abbottabad. | SST (B/C) vide Endst: No. 3919-25 Dated 30.11.2015 | SST (B/C) Vide Endst: No.4272-78 Dated: 25.04.2017 | 01-12-2015 |

DISTRICT EDUCATION OFFICER (M)
ABBOTTABAD

Endst No.5154-56/EB-I/SSTs/Pay Protection.

Dated 19-09-2020

Copy forwarded for information & necessary action to:-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Accounts Officer, Abbottabad.
3. The Principals/Headmasters of concerned GHSS/GHS.

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NOTIFICATION.

In pursuance of Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No: SO(S/F)E&SED/3-2/2018/SIT/Contract dated 16.02.2018 and Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Notification No.6842-6942/F.No./SST (M) Pay protection / regularization dated 25.01.2019, and consequent upon regularization of all teachers / employees appointed on "Adhoc /Contract Basis" through NTS during the period /year i.e, 2014/2015/2016/2017 and 2018, (They are allowed "Pay protection" Teachers "in line with Govt: of Khyber Pakhtunkhwa Finance Deptt/ Circular No.FD/(SOR-1)12-7/2014 dated 06.02.2014 with rule FR-22(b). Pay protection is hereby allowed to the following Adhoc/Contract employees/teachers towards their Post/Previous/Service in line with Govt. of Khyber Pakhtunkhwa Finance Department Circular No.FD/(SOR-1)12-7/2014 dated read with rule FR-22(b).

| S.No. | NAME OF TEACHER/DESIG: AND SCHOOL | PREVIOUS SERVICE TO BE PROTECTED |
|-------|--|----------------------------------|
| 1 | MR. MUHAMMAD ASIF, CT GMS GUNJ GATE | EDUCATION DEPARTMENT |
| 2 | MR. FAWAD ALI DURRANI, CT GSOZCMHSS NO.2 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 3 | MR. KAMRAN, CT GHS PAHARI PURA | EDUCATION DEPARTMENT |
| 4 | MR. WAJID ALI, CT GHSS DAAG | EDUCATION DEPARTMENT |
| 5 | MR. MUHAMMAD JANAS KHAN CT GHS MATHRA | EDUCATION DEPARTMENT |
| 6 | MR. MUHAMMAD SAQIB, PET GMS GUL ABAD | EDUCATION DEPARTMENT |
| 7 | MR. MUHAMMAD ILYAS CT GHS ZARYAB COLONY | EDUCATION DEPARTMENT |
| 8 | MR. SAMI UL HAQ CT GHS LARAMA | EDUCATION DEPARTMENT |
| 9 | MR. NABI GUL CT GSHS NO.1 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 10 | MR. MALIK FAIZAN CT GSHS NO. PESHAWAR CITY. | EDUCATION DEPARTMENT |
| 11 | MR. MUHAMMAD SALMAN, CT GSHSHSS NO.1 PESHAWAR CITY. | EDUCATION DEPARTMENT |
| 12 | MR. ASIF ALI, CT GSOZCMHSS NO.2 PESHAWAR CITY. | EDUCATION DEPARTMENT |
| 13 | MR. SANA ULLAH, CT GHS SHER BAD | EDUCATION DEPARTMENT |
| 14 | MR. ISRAR ULLAH, CT GHS SHER DAD | EDUCATION DEPARTMENT |
| 15 | MR. SHIRAZ ASLAM, CT GSOZCMHSS NO.2 PESHAWR CITY. | EDUCATION DEPARTMENT |
| 16 | MR. NAIK RAHMAN CT GSOZMHSS NO.2 PESHAWAR CITY. | EDUCATION DEPARTMENT |
| 17 | MR. SAID WALI KHAN CT GSOZCMHS NO.4 PESHAWAR CITY. | EDUCATION DEPARTMENT |
| 18 | MR. WAQAR YOUNAS, CT GSFHCMHS NO.4 PESHAWAR CANTT. | EDUCATION DEPARTMENT |
| 19 | MR. DARWESH KHAN CT, GHS TAKHT ABAD | EDUCATION DEPARTMENT |
| 20 | MR. TAHMIDDULLAH CT, GHS TAKHT ABAD | EDUCATION DEPARTMENT |
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15

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

In pursuance of Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No. SO/S/PT/ESSE/3-2/2018/SIT/Contract dated 16-02-2018, it is hereby notified for the information of all DEOs ESSE (Male/Female) in Khyber Pakhtunkhwa and future course of action that consequent upon regularization of all teachers/employees appointed on "ad hoc/contract basis" through NTS during the period/year from 2014, 2015 & 2017-18 and regularized during 2018. They are allowed "Pay Protection" towards their "past/previous service" rendered by the concerned employees/teachers as "ad hoc/contract employees/teachers" in line with Government of Khyber Pakhtunkhwa Finance Department Circular No. FD/(SOR-1)12-7/2014 dated 06-02-2014 read with rule FR-22 (b).

The aforesaid "Pay Protection" is also admissible to those teachers/employees inducted in ESSE Department from other Provincial Departments of Khyber Pakhtunkhwa through proper channel/NOC and subject to the condition that there is no break/interruption between service rendered in other Provincial Department and ESSE Department as admissible under rule FR-23.

All the District Education Officers (Male/Female) in Khyber Pakhtunkhwa are advised that the "Pay Protection" cases of teachers/employees working under their respective Districts may not be referred to this Directorate in future.

6842-6942

(Hafiz Dr. Muhammad Ibrahim)


Director

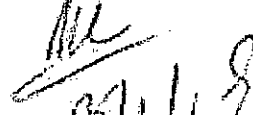
Encl: No. _____ /F.No. 14/SST (M) Pay Protection/Regularization

Dated Peshawar the 25/1/2019

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- Copy of the above is forwarded for information and necessary action to the:-
- All District Education Officers (M/F) in Khyber Pakhtunkhwa.
- All District Accounts Officers in Khyber Pakhtunkhwa.
- PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department.
- Additional Director (Estab) Local Directorate.
- All Deputy Directors (M&F) in Local Directorate.
- All Assistant Directors (M&F) in Local Directorate.
- Officials concerned.
- PA to Director Local Directorate.
- Master File.


Deputy Director (Estab) 23/1/19
Elementary & Secondary Education
Khyber Pakhtunkhwa


23/1/19

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR**

NOTIFICATION

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S)F/E&SED/3-2/2018/SIT/Contract dated 16.02.2018, it is hereby notified for the information of all DEOs E&SE (Male/Female) in Khyber Pakhtunkhwa and future course of action that consequent upon regularization of all teachers/employees appointed on "adhoc/contract basis" through NTS during the period/year from 214, 2015& 2017-18 and regularized during 2018. They are allowed "Pay Protection" towards their "past/prevlous service" rendered by the concerned employees/teachers as "adhoc/contract employees/teachers" in line with Government of Khyber Pakhtunkhwa Finance Department Circular No. FD/(SOR-1)12-7/2014 dated 06.02.2014 read with rule FR 22 (b).

The aforesaid "Pay Protection" is also admissible to those teachers/employees inducted in E&SE Department from other Provincial Departments of Khyber Pakhtunkhwa through proper channel/NOC and subject to the condition that there is no break/interruption between service cendered in other Provincial Department and E&SE Department as admissible under rule FR.23.

All the District Education Officers (Male/Female) in Khyber Pakhtunkhwa are advised that the "Pay Protection" cases of teachers/employees working under their respective Districts may not be referred to the Directorate in future.

(Hafiz Dr. Muhammad Ibrahim)

Director

Endst: No.6842-6942/F.No.14/SST (M) Pay Protection/Regularization

Dated Peshawar the 25/ 1/ 2019

Copy of the above is forwarded for information and necessary action to the:

1. All District Education Officers (M/F) in Khyber Pakhtunkhwa.
2. All District Accounts Officers in Khyber Pakhtunkhwa.
3. PS to Govt. of Khyber Pakhtunkhwa E&SE Department.
4. Additional Director (Estab) in Local Directorate.
5. All Deputy Directors (M&F) in Local Directorate.
6. All Assistant Directors (M&F) in Local Directorate.
7. Officials concerned.
8. PA to Director Local Directorate.
9. Master File.

Deputy Director (Estb)
Elementary & Secondary Education
Khyber Pakhtunkhwa

E-16

Service Appeal No. 7364/2021 titled "Ali Akbar Versus Secretary Elementary & Secondary Education Department Khyber, Peshawar and others"



ORDER
27.11.2023


MUHAMMAD AKBAR KHAN, MEMBER (E):- Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present. Arguments heard and record perused.

02. During the course of arguments, learned counsel for the appellant submitted a copy of office order bearing No. 7293-47/F.No.120/DEO(M)/Dir Upper dated 29.03.2022 wherein the District Education Officer (Male) District, Dir Upper (respondent No. 3) has granted pay protection in respect of fourteen similarly placed employees with effect from their first appointment with all benefits. Since the case of the appellant is the same as that of fourteen employees mentioned in the aforementioned order we, therefore, remit the instant appeal to the respondents for consideration on the analogy of the aforementioned fourteen employees/colleagues of the appellant.


03. The instant appeal is disposed of on the above terms. Consign.

04. Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 27th day of November, 2023.


(Rashida Bano)
Member (J)


(Muhammad Akbar Khan)
Member (E)

Kuzamallah


CA MEMBER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 21-3-24
Number of Words 17
Copying Fee 5
Urgent 52
Total 10/-
Name of Copyholder _____
Date of Completion 21-3-24
Date of Delivery of Copy 21-3-24

The Director of Education Department W.P. Bhatnagar

(17)

Subject: Application/Departmental Representation for
Extension/allowing pay fixation in the
Application/Representation from the date of
First appointment.

R/5

That the applicant is in employ of your
good-self department. That the applicant
applicant was first appointed after fulfilling
all the legal and legal formalities and
started performing his duties against the
said post with expectation.

That your good self department representative of
certain post for which the applicant applied
applied through proper channel and once again
appointed against the said posts and
continued his services.

That the applicant in and applicant appointed
in the same department and with out any service
break. That after regularization in 2018 the
service of the applicant was regularized against
the said post, but the salary and pay was
not fixed for years first appoint order.
But the applicant made various post
in this regard in the concern of 2018 but
in view.

It is humbly requested that
on exception & this request/representation the
pay of the applicant may kindly be fixed
from the date of first appointment.

Yours truly
D. S. Bhatnagar
PET (17/18)
N. 501 or 218.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. _____/2024

Mr. *Abdul Rehman*

.....**APPELLANT**

VERSUS

The DEO Mardan

.....**RESPONDENT**

KNOW ALL to whom these presents shall come that I the undersigned appoint: ***Umar Farooq Mohmand,***
Advocate High Court, Peshawar (herein after called the advocate) to be the Advocate for the ***Mr. *Abdul Rehman****
in the above mentioned case, to do all the following acts, deeds and things or any of them, that is to say:

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me 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.

IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this ____th day of March, 2024

Umar Farooq Mohmand
Signature/ thumb impression
of party / parties.

Accepted By

Umar Farooq Mohmand

Umar Farooq Mohmand,

Advocate High Court, Peshawar.

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Waleed Adnan

Advocate High Court, Peshawar.

Muhammad Ayub

Advocate High Court, Peshawar.