


FORM OF ORDER SHEET

Court of _____

Appeal No. 563/2024


| 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. Kifayat Ullah 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  REGISTRAR</p> |

The appeal of Mr. Kifayat Ullah 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. 680 /S.T,

Dt. 26/3 /2024.


26/3/24

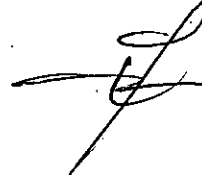
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Umar Farooq Mohmand Adv.
High Court Peshawar.

R. Sir,

The objection removed, Re-submitted

9/4/2024



BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

No. 563 /202

Mr. Kibayat Ullahs

Education Deptt

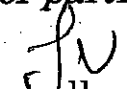
APPLICATION FOR FIXATION OF THE ABOVE
TITLED APPEAL AT PRINCIPAL SEAT,
PESHAWAR.


Respectfully Sheweth:

1. That the above mentioned appeal is submitted before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Tribunal Rules 1974, a Tribunal may hold its sitting at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning here that other similar appeal regarding similar prayer submitted before this Hon'ble Tribunal and the above mentioned appeal have also similar prayer regarding fixation of pay, so for the best administration of justice the instant appeal may also be fixed before principal seat of this tribunal.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble Tribunal.

It is therefore prayed that on acceptance of this application the above titled appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Through ,


Appellant/Applicant


H. H. C

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 563 /2024

Mr. Kifayat Ullah **APPELLANT**




VERSUS

The DEO Dir Upper **RESPONDENT**

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Dated:

APPELLANT
Through: 
UMAR FAROOQ MOHMAND

WALED ADNAN

MUHAMMAD AYUB
ADVOCATES HIGH COURT

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 563 /2024

Mr. Kifayat Ullah, PST BPS-12,
GPS Pacha Kallay, Dir Upper.

.....APPELLANT

VERSUS

The District Education Officer, District Dir Upper.

.....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./03/2016 I.E. FROM THE DATE OF INITIAL 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. 05/03/2016 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 PST (BPS-12) vide order dated 05/03/2016 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 PST (BPS-12), the respondent again advertised the post of PST (BPS-12), whereby the appellant

applied to the same through proper channel and after proper recommendation of the Departmental Selection Committee the appellant was appointed as PST (BPS-12) vide order dated 3/05/2017 and started performing his duties quite efficiently and to the entire satisfaction of his high ups. Copy of the 2nd appoitmnet order is attached as annexure.....**B**

3- That the service of the appellant was regularized through Notification dated 21/03/2018 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 21/03/2018 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 employs, 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 felling 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. 05/03/2016 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 05/03/2016 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. 05/03/2016 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

UMAR FAROOQ MOHMAND
WALED ADNAN 
MUHAMMAD AYUB 
 ADVOCATES HIGH COURT

AFFIDAVIT

I, Mr. Kifayat Ullah, PST BPS-12, GPS Pacha Kallay, Dir Upper, 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





"A" - 4 -

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

PH No.0944-881400 FAX-0944-880411- email- demisdirupper@gmail.com

OFFICE ORDER

Consequent upon the recommendation of the Departmental Promotion Committee, appointment of the following candidates are hereby ordered against the post of Primary School Teachers (PST) Male Wards / School based in BPS-12 (Rs.9055-050-20555) @ Rs. 9055 / - fixed plus usual allowances as admissible under the rules on adhoc basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of taking over charge :-

| S.# | Name | Father's Name | Merit | Ward/ U.C | Place of Posting |
|-----|-------------------|----------------|--------|-----------|------------------|
| 1 | ABDUL WARIS | SAID MUHAMMAD | 120.9 | GANORI | GPS ABAKAND NO.1 |
| 2 | SAHIB ZADA | JAMAL KHAN | 107.72 | GANORI | GPS AURAIY |
| 3 | SAFI ULLAH | SAIDULLAH | 107.39 | GANORI | GPS AURAIY |
| 4 | AMINULLAH | ZAHIR JAN | 106.61 | GANORI | GPS BAGHRO |
| 5 | INAM ULLAH | GUL KARIM JAN | 105.31 | GANORI | GPS BAGHRO |
| 6 | SAYED ISLAM ULLAH | SAID FATIH JAN | 103.28 | GANORI | GPS HATAN BALA |
| 7 | ROHUL AMIN | GUL ARIF KHAN | 101.07 | GANORI | GPS SALAM KOT |
| 8 | IMRAN ULLAH | AMAN ULLAH | 100.77 | GANORI | GPS PACHA KALI |
| 9 | MUHAMMAD SAEED | FATIH RAHIM | 99.9 | GANORI | GPS PACHA KALI |
| 10 | FATHULLAH | SAIDULLAH | 98.56 | GANORI | GPS AYURAI |
| 11 | KIFAYAT ULLAH | ZAREEN KHAN | 98.44 | GANORI | GPS ZALAM KOT |
| 12 | SYED HAFIZ ULLAH | MATIULLAH | 97.09 | GANORI | GPS PACHA KALI |
| 13 | SHAHAB ULLAH | HAMIDUL HAQ | 96.68 | GANORI | GPS SALAM KOT |
| 14 | SAMI ULLAH | AJMIR KHAN | 95.16 | GANORI | GPS BAGHRO |
| 15 | SHER ZADA | WAZIR | 93.53 | GANORI | GPS BAGHRO |
| 16 | SYED WAHAB UL HAQ | HAMIDUL HAQ | 91.96 | GANORI | GPS HATAN BALA |

TERMS & CONDITIONS:-

- 1 NO TA/DA is allowed.
- 2 Charge reports should be submitted to all concerned in duplicate.
- 3 Appointment is purely on temporary basis initially for one year.
- 4 They should not be handed over charge if they exceed 35 years or below 18 years of age.
- 5 Appointment is subject to the condition that their certificates/degrees must be verified from the concerned authorities if any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
- 6 His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
- 7 Pay will not be made until and unless a certificate from the concerned authority is issued as his certificates are verified.
- 8 They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
- 9 Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- 10 He will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 11 Their services shall be terminated at any time, in case of his performance is found unsatisfactory during his probation period. In case of misconduct, he will be proceeded under the rules.
- 12 His appointment is made on School base I, He will have to serve at the place of posting, and his service is not transferable to any other station.
- 13 Before handing over charge once again their document may be checked if they having no required qualifications they may not be handed over charge.
- 14 No payment will be made so then before making verification from concerned institutions.
- 15 The errors and omissions etc if found at any stage shall be rectified. In cas of termination of Said Candidate, he will have no right to claim the order already issued in any court.

ATTACHED

-5-

Cont: Page No.2

(MOIN-UD-DIN)
District Education Office
Male dir Upper

Endst: No. 332-37 / File No. 03C/PST/ Appt: 2016 NTS / DEO(M)/ ADO(P) Dated Dir (U) the 05/03/2016.

Copy forwarded for information and necessary action to the:-

- 1 Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2 District Accounts Officer Dir Upper
- 3 Dy: District Education Officer Male Dir Upper.
- 4 Sub: Divisional Education Officer Male Dir and Wari.
- 5 Official Concerned.
- 6 M/File

M. P. W.
M. P. W.

District Education Officer
Male dir Upper

M. P. W.
M. P. W.



OFFICE OF THE
OFFICER (MALE) DIR UPPER
PH NO.0944-881400 Email: deomdirupper@email.com.

"B" - 6-

APPOINTMENTS

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Primary School Teachers (PST) Male School-based in BPS-12 (Rs.11140-800-35140) @ Rs.11140/- fixed plus, usual allowances as admissible under the rules on adhoc basis 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. No | NTS Roll No. | Name | Father Name | DOB | Place of Posting | CNIC | Merit | Ward/U.C. | Remarks |
|-------|--------------|--------------------|-----------------|------------|----------------------------|-----------------|--------|-----------|---------|
| 1 | 7935000794 | HIDAYAT ULLAH | FALAS KHAN | 10/20/1988 | GPS PACHA KALI | 15701-3243699-9 | 127.92 | GANORI | AVP |
| 2 | 7733001147 | ABDUL MASTAN | SAID AHIN JAN | 4/17/1993 | GPS DIHERI | 15401-7131199-9 | 113.81 | GANORI | AVP |
| 3 | 7932000827 | SALAH UD DIN | ZAMIN | 3/3/1995 | GPS ZALAM KOT | 15701-8111307-9 | 111.68 | GANORI | AVP |
| 4 | 7935000363 | IKRAM UD DIN | MOHAMMAD RAFIQ | 3/21/1983 | GPS LANDY KHAWAR | 15701-1229919-5 | 110.35 | GANORI | AVP |
| 5 | 7931000885 | ISLAHUQ DIN | HAZRAT ALI KHAN | 4/10/1990 | GPS KHAKH DAR | 15701-5927550-9 | 109.26 | GANORI | AVP |
| 6 | 7917000189 | KIFAYAT ULLAH | ZARIN KHAN | 1/3/1991 | GPS PACHA KALI | 15701-4109035-1 | 107.44 | GANORI | AVP |
| 7 | 7631000794 | ABDUL BASHI | ABDUR RAZID JAN | 3/15/1988 | GPS LANDY KHAWAR | 15701-8224899-9 | 106.85 | GANORI | AVP |
| 8 | 7931000679 | SYED MUHAMMAD AYAZ | ZAMIR JAN | 4/2/1984 | GPS HATAN DALA | 15701-0316854-1 | 105.32 | GANORI | AVP |
| 9 | 7617000251 | RAFI UL HAQ | AZIZ UL HAQ | 8/8/1991 | GPS BAGHRO | 15701-1524541-7 | 104.36 | GANORI | AVP |
| 10 | 7932000862 | ABDUL WAHID | SAID MUHAMMAD | 9/12/1991 | GPS MAHEEN BANDA | 15701-7879458-5 | 104.17 | GANORI | AVP |
| 11 | 8932001356 | FAZAL WAHID | GUL SHARIF | 1/2/1992 | GPS BAGHRO | 15701-1212244-9 | 101.98 | GANORI | AVP |
| 12 | 7917000242 | MUHAMMAD SALIM | UMARA KHAN | 8/1/1994 | GPS KAR BORAI HATTEN DARRA | 15701-5223658-9 | 101.41 | GANORI | AVP |
| 13 | 7921000710 | SYED FAYAZ ULLAH | SULTAN ULLAH | 8/10/1996 | GPS JOON BANDA | 15701-2361630-9 | 98.92 | GANORI | AVP |
| 14 | 7813000962 | JAMIL ULLAH | FATEH MULK KHAN | 4/15/1989 | GPS SORIPAW | 15701-6235595-9 | 93.12 | GANORI | |

TERMS & CONDIATION.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary basis initially for one year --
4. They should not be handed over charge if they exceed 35 years or below 18 years of age.
5. Appointment is subject to the condition that their certificates/degrees must be verified from the concerned authorities if anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be paid until and unless a certificate from the concerned authority is issued that their certificates are verified.
8. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. Their services shall be terminated at any time, in case of their performance is found unsatisfactory during their contract period. In case of misconduct, they will be preceded under the rules framed from time to time.
12. Their appointments are made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have no required qualifications, they may not be handed over charge.
14. No payment will be made so then before making verification from concerned institutions.

[Handwritten signature]

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3143-51

DISTRICT EDUCATION OFFICER
(MALE) DIR UPPER

[Handwritten initials]

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Dir Upper
3. Dy: District Education Officer Male, Dir Upper.
4. Sub: Divisional Education Officer (Male) Dir, Warl, Barawal and Kalkot.
5. Head Teachers concerned.
6. Sr. CO EMIS Local Office.
7. Official Concerned.
8. M/FILE

Copy forwarded for information and necessary action to the:-

Enst: No. 3143-51 File No:03C/PST/Appnt:2017 NTS/DEO(M)/ADOLP)dated Dir (U) the 03/05/2017.

DISTRICT EDUCATION OFFICER
(MALE) DIR UPPER

15. The errors and omissions etc if found at any stage shall be rectified. In case of termination of said candidate, he will have no right to claim the order already issued in any court.

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S No 361

"C" 25 -8-



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

PH No. 0944-881400-Fax-881400 E-mail deomdirupper@gmail.com



NOTIFICATION

In pursuance of Khyber Pukhtunkhawa Employees of the Elementary & Secondary Education Appointment & Regularization of Services Act.2017 (Khyber Pukhtunkhawa Act no.1 of 2018) & Elementary & Secondary Education Department Notification No SO(S/F)E&SED/3-2/2018/SITT/Contract Dated: 16/02/2018. Services of the following (379) Primary School Teachers of Sub-Division Dir Upper Dir appointed w.e.f.(03-05-2014 to 23-06-2017) through NTS on adhoc/contract basis, are hereby regularized in BPS-12, on terms and condition given below with effect from the date of their 1st appointment as per details given against each, in the interest of public service.

| S.No | NTS Roll No. | Name | Address/UC | Total Marks/200 | Name of School | App Order No & Date | Date of Taking over charge | Extension Order No & date |
|------|--------------|-----------------|------------|-----------------|-----------------------|----------------------|----------------------------|---------------------------|
| 1 | 3560476 | SHERYAR KHAN | JABBAR | 104.04 | GPS GAMSER | 8572-79 3-5-14 | 04-05-14 | 1079--83 28/2/2018 |
| 2 | 3560148 | BADSHAH SAID | BIBYAWAR | 117.16 | GPS TALO | 8572-79 13/5/2014 | 05-05-14 | 1079--83 28/2/2018 |
| 3 | 3560538 | HIDAYATULLAH | CHUKIATAN | 103.29 | GMPS JABALOOK | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 4 | 3560537 | ASAD ALI SHAH | DARORA | 113.84 | GPS CHUMRA BALA | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 5 | 3560208 | KHALILUR RAHMAN | DARORA | 112.95 | GMPS WALI KHAN KANDOW | 8572-79 3/5/2014 | 05-05-14 | 4205-98/6/2017 |
| 6 | 3560008 | SAHIB RAWAN | GANORI | 104.57 | GPS KARBORAI | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 7 | 4532001221 | MUHAMMAD HASSAN | GANORI | 107.55 | GPS SORI PAW | 8572-79 3/5/2014 | 05-05-14 | 3987-91 3/6/2017 |
| 8 | 3560517 | SYED MAROOF JAN | GANORI | 105.93 | GPS AYURAI | 8572-79 3/5/2014 | 05-05-14 | 3987-91 3/6/2017 |
| 9 | 3560690 | SYED USMAN JAN | GANORI | 103.05 | GPS PACHA KALEY | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 10 | 3560134 | SYED RAHIM | GANORI | 105.48 | GPS DHERI HATTAN | 8572-79 3/5/2014 | 05-05-14 | 1782-87 24/5/2016 |
| 11 | 356042 | WALIULLAH | GANORI | 112.86 | GPS ZULAMKOT | 9572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 12 | 3560803 | JALALUD DIN | JABBAR | 116.12 | GPS DAM JABBAR | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 13 | 3560402 | IRFANULLAH | JABBAR | 107.51 | GPS GAMSEER | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 14 | 7933000877 | IKRAMULLAH | JABBAR | 108.48 | GPS GAMSEER | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 15 | 3560406 | NAJMULLAH | JABBAR | 100.93 | GPS GAMSEER | 8572-79 3/5/2014 | 05-05-14 | 1079--83 28/2/2018 |
| 16 | 3560015 | ABDULLAH LATIF | JABBAR | 106.16 | GPS NISHAN BANDA | 8572-79 3/5/2014 | 05-05-14 | 4205-9 8/6/2017 |
| 17 | 3560164 | ABDULLAH | JABBAR | 104.28 | GPS KANDWO JABBAR | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 18 | 3560435 | SAFEDULLAH | PALAM | 116.58 | GPS DANIL | 8572-79 3/5/2014 | 05-05-14 | 2795-2800 19/4/2017 |
| 19 | 3560757 | SULIMAN SHAH | TARPATAR | 114.88 | GMPS DAKAI AEMAS | 8572-79 3/5/2014 | 05-05-14 | 4205-9 8/6/2017 |
| 20 | 3560558 | HFIKHAR ALI | TARPATAR | 112.6 | GMPS SIA GAI KORE | 8572-79 3/5/2014 | 05-05-14 | 3987-91 3/6/2017 |
| 21 | 792300418 | RAFIULLAH | CHUKIATAN | 107.01 | GPS HAYAGAI GHARBI | 8572-79 3/5/2014 | 13-05-14 | 4854-58 6/7/2017 |
| 22 | 3560002 | TAHIR JAN | GANORI | 97.95 | GPS SALAMKOT | 8625-32 3/5/2014 | 06-05-14 | 1782-87 24/5/2016 |

ADO (F) Establishment

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POST (NTS) Regular 2017

| Sl. No. | Roll No. | Name | Category | Age | Qualification | Score | Rank | Date |
|---------|----------|--------------|----------|-----|---------------|--------|--------|-----------|
| 1 | 7220001 | MAHARAJA | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 2 | 7220002 | SAYYED AHMED | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 3 | 7220003 | AJAZ KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 4 | 7220004 | SAAD KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 5 | 7220005 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 6 | 7220006 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 7 | 7220007 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 8 | 7220008 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 9 | 7220009 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 10 | 7220010 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 11 | 7220011 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 12 | 7220012 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 13 | 7220013 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 14 | 7220014 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 15 | 7220015 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 16 | 7220016 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 17 | 7220017 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 18 | 7220018 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 19 | 7220019 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 20 | 7220020 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 21 | 7220021 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 22 | 7220022 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 23 | 7220023 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 24 | 7220024 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 25 | 7220025 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 26 | 7220026 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 27 | 7220027 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 28 | 7220028 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 29 | 7220029 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |
| 30 | 7220030 | GPS KHAN | BAHAWAL | 23 | GPS | 332-37 | 332-37 | 19/4/2017 |



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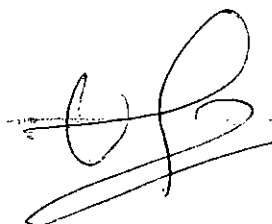
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| | | | | | | | | | |
|-----|------------|-----------------|--------|--------|-----------------------|---------------------|----------|--|--|
| 93 | | | DARORA | | | | 03-07-16 | | |
| 94 | | YOUSAF ZADA | DARORA | | | | 03-07-16 | | |
| 95 | | RAAZ MUHAMZAD | DARORA | | | | 03-07-16 | | |
| 96 | | DAZ AHMAD | DARORA | | | | 03-07-16 | | |
| 97 | | ZIAULLAH | DARORA | | | | 03-07-16 | | |
| 98 | | IRSHAD HUSSAIN | | | | | 03-07-16 | | |
| 99 | | FAZLULLAH | | | | | 03-07-16 | | |
| 100 | | SAJID ALI | | | | | 03-07-16 | | |
| 101 | | FARMAN ALI | | | | | 03-07-16 | | |
| 102 | | ANWAR ZED KHAN | | | | | 03-07-16 | | |
| 103 | | INAMUL HAQ | | | | | 03-07-16 | | |
| 104 | | NADIM HUSSAIN | | | | | 03-07-16 | | |
| 105 | | ROHAIL ABBAS | | | | | 03-07-16 | | |
| 106 | | WAHIDJAN | | | | | 03-07-16 | | |
| 107 | 7917000189 | KEFAYATULLAH | GANORI | 107.44 | GPS PACHA KALEY | 332-37 5/3/2016S | 03-07-16 | | |
| 108 | | SAMIULLAH | GANORI | 97.00 | GPS PACHA KALEY | 332-37 5/3/2016 | 03-07-16 | | |
| 109 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 110 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 111 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 112 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 113 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 114 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 115 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 116 | | | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 117 | | INAMULLAH | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 118 | | SAFIULLAH | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 119 | | MUHAMMAD SAEED | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 120 | | ROOHUL AMIN | GANORI | | | 332-37 5/3/2016 | 03-07-16 | | |
| 121 | | GULWAHID | GANORI | | | 422-27 5/3/2016 | 03-07-16 | | |
| 122 | | FARMAN ULLAH | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |
| 123 | | HANIF KHAN | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |
| 124 | | SAHIB ZADA | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |
| 125 | | MUHAMMAD ISHAQ | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |
| 126 | | BASIT ALI KHAN | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |
| 127 | | SHARIFULLAH | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |
| 128 | | HABIB UR RAHMAN | PALAM | | | 422-27 5/3/2016 | 03-07-16 | | |

| | | | | | | | |
|----|------------|-------------------|-----------|--------|--------------------------|---------------------|----------|
| | | | | | BANDA | 23/6/2017 | |
| 77 | 7917000274 | MUHAMMAD YASIN | DARORA | 80.02 | GPS NAWROZ KHAN KALEY | 4920-26 8/7/2017 | 08-01-17 |
| 78 | 7917000203 | ATTAULLAH | TARPATAR | 84.97 | GPS ALIGASAR | 4080-86 8/6/2017 | 09-06-17 |
| 79 | 7935000365 | IMRANULLAH | CHUKIATAN | 103.96 | GPS Chukiatan | 3116-24 3/5/2017 | |

Terms & Condition

1. Their services shall be governed by the Khyber Pukhtunkhawa Civil Servants Act, 1973, the Khyber Pukhtunkhawa (Appointment, Deputation, Posting & Transfer of teacher, Instructors & Doctors) Regulatory act, 2011, and such rules and regulations as may be issued from time to time by the Government.
2. Their services shall be considered regular and they shall be eligible for pension / deduction of GP Fund in terms of the Khyber Pukhtunkhawa Civil Servant Act, 1973 as amended in 2013.
3. They shall possess the same qualification and experience required for the regular post.
4. Their services are liable to termination on one month notice from either side, in case of resignation without notice, their one month pay/allowances shall be forfeited to the Government.
5. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
6. The regularization shall not be in favor of those, who have not taken over charge or have remained absent from duty or resigned from service and also not for those who are under disciplinary proceedings.
7. The Employees whose services regularized under the Khyber Pukhtunkhawa Employees of the Elementary & Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pukhtunkhawa Act No.1 of 2018) or in the process of attaining service at the commencement of Khyber Pukhtunkhawa Employees of Elementary and secondary Education (Appointment and Regularization of services) Act, 2017 (Khyber Pukhtunkhawa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre. As the case may be, who are in service on regular basis on the commencement of the Khyber Pukhtunkhawa Employees of Elementary And secondary Education (Appointment and Regularization of services) act, 2017 (Khyber Pukhtunkhawa Act No.1 of 2018) and shall also junior to such other persons, if any, who, were appointed on regular basis to the respective service or cadre before the commencement of this Act, irrespective of their actual date of appointment.
8. The seniority inter-se of the employees, whose are regularized under this Act within the same service or cadre, shall be determined on the basis of their merit position in such service or cadre.
9. Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous services in the case of two or more employees is the same, the employee older in age shall be ranked senior to the younger one.




(ABDUL HAQ)
DISTRICT EDUCATION OFFICER
(MALE) UPPER DIR

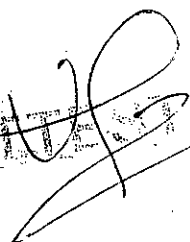
Endsrt: No. 1568-74/F.No 158/DEO (M)/ADO (P) ESTB: Dated 21 / 3 / 2018

Copy forwarded to the

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Upper Dir
3. Dy: District Education Officer (M). Upper Dir
4. SDEO (Male) Barawal, Kalkot, Dir. Wari & Sheringal.
5. Teachers Concerned
6. AP EMIS Local Office
7. Office Copy


DISTRICT EDUCATION OFFICER
(MALE) UPPER DIR

g/c


ATTACHED

Large blacked-out redacted table covering the majority of the page. Some faint text is visible within the blacked-out area, including headers like "NAME", "ADDRESS", "CITY", "STATE", and "ZIP", and some numbers like "100", "101", "102".

Handwritten signature or initials, possibly "J.B."

**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, Umralai (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 Rehamn 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 | Muhamamad 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 | Majeeb Ullah PST | GPS Gul Shai Dheri Wari | 12.03.2015 | 05.03.2016 | -do- | -do- |
| 12 | Dayeem Khan, PST | GPS Umralai Bala | 06.03.2016 | 03.05.2017 | -do- | -do- |
| 13 | Fakhri Alam PST | GPS, Umralai (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

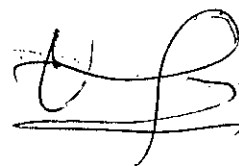
No.7243-47/E.No.120/DEO(M)/Dir Upper

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 UPPER





- 13 -

**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 | Aia ur Rahman SST | GHS Shinkari | 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 | GHSS 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.23-04-2016 | 15-06-2015 | |
| 05 | Abdul Haseeb SST | GHSS Warf | SST No.3987-93 dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 06 | Salim Ullah SST | GHS Karkabari | SST No.3987-93 dt.30-11-2015 | SST-No.4878-84 dt.28-04-2017 | 30-11-2015 | |
| 07 | Syed Gauhar Jamal CT | GMS Bandi | CT No.3367-74 dt.15-06-2015 | CT No.1698-1705 dt.28-03-2017 | 15-06-2015 | |
| 08 | Imran Khan SST | GHSS Gandigar | PST No.8572-79 dt.03-05-2014 | SST-4100-06 dt.30-11-2015 | 03-05-2014 | |
| 09 | Sharif Ullah SST | GHS Jugram | CT No.981-88 dt.12-03-2015 | SST-No.4878-84 dt.28-04-2017 | 12-03-2015 | |
| 10 | Syed Fazal Ghani SST | GHSS Barawal Bandi | 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 Katkay | 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 Jabber | PST No.434-40 dt.05-03-2016 | CT No.4643-50 dt.21-06-2017 | 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 | GHSS Gamseer | 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 | GHSS Ushari | SST No.4913-20 dt.30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 18 | Haz Khan SST | GHS Bandi | SST No.2084-91 dated 30-04-2014 | SST.No.4878-84 dt.28-04-2017 | 30-04-2014 | |
| 19 | Fazal Hayer SST | GHS Karkabari | 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 | Shakeel Khan SST | GHS Shinkari | 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 Gamseer | 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 Karkabari | 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 Dam Jabber | 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 | GHSS Akhgram | 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

ATTESTED

| | | | | | |
|----|---------------------|--------------|--|--|------------|
| 26 | Imranullah DM | GMS Hafizal | PST Order No. 9611-14 dated 30-06-2014 | DM Order No. 1468-73 dated 17-03-2018 | 30-06-2014 |
| 27 | Muhammad Shuaib SST | GISS Gamveer | SST Order No. 3987-93 dated 30-11-2015 | DM Order No. 4878-84 dated 28-04-2017 | 30-11-2015 |
| 28 | Naik Wali SST (IT) | GHS Durara | CT order No. 961-88 dated 12-03-2015 | SST IT No. 154-17/BA/SE/1-3-500-11-8/ule /2016 | 12-03-2015 |
| 29 | Mohammad Tariq SST | GMS Hafizal | PST order No. 3030-35 dated 20-07-2011 | SST (G) order No. 2054-91 dated 30-04-2014 | 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.

[Signature]
 DISTRICT EDUCATION OFFICER (M)
 DIR UPPER

DEO (M) DIR UPPER

[Signature]

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD.



☎ 0992 9310102, 0992 330131
 ✉ epp@abbottabad.gov.pk

GRANT OF PAY PROTECTION

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S) P/L&SEL/3-2/2018/ST/ Contract dated 10-02-2018 and Govt. of Finance Department Circular No. FD/(SOR) 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 No | Name /Designation/School | 1st Appointment as | Date of Appointment as | Allowed Pay Protection w.e (year) |
|------|---|--|---|-----------------------------------|
| 1. | Mr. Saadique Hussain Shahi SST (B/C) GHIS Bardsi Phandara Abbottabad. | SST (B/C) vide Endst. No.3919-25 dated 30-11-2015 | SST (B/C) Vide Endst. No. 2059-61 dated 26-07-2017 | 01-12-2015 |
| 2. | Mr. Muhammad Nisar SST (B/C) GHIS Bakote Abbottabad. | PST vide Endst. No. 7579-7680 dated 15-10-2014. | SST (B/C) Vide Endst. No. 4272-78 dated 25-04-2017. | 16-10-2014 |
| 3. | Mr. Muneez ul-Haq SST (M/P) GHSS Nawanshehr Abbottabad. | CT Vide Endst. No 2907-12 dated 05-05-2014. | SST (M/P) Vide Endst. No 4272-78 dated 25-04-2017. | 06-05-2014 |
| 4. | Mr. Waqean 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 25-04-2017. | 01-12-2015 |
| 5. | Mr. Mohammad Mohtasim Aizal Abbasi SST (M/P) GHIS Phullah Abbottabad. | CT Vide Endst. No. 1854-60 dated 14-03-2015. | SST (M/P) Vide Endst. No. 4272-78 dated 25-04-2017. | 16-03-2015 |
| 6. | Hafo Mohammad Amir Abbasi SST (G) GHIS Ghandarez Abbottabad. | AT vide Endst. No.3034-39 dated 10-05-2014. | SST (G) Vide Endst. No. 4272-78 dated 25-04-2017. | 12-05-2014 |
| 7. | Mr. Muhammad Sajid SST (B/C) GHIS No 3 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 |
| 8. | Mr. Jaber Farooq, SST(B/C) GHIS Ripaya 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. Zaun Akhtar, SST (M/P) GHIS Kojoya 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) GHIS Soanmaler East A/Abad. | CT Vide Endst. No 2907-12 dated 05-05-2014 | SST (G) Vide Endst. No. 4272-78 dated 25-04-2017. | 14-05-2014 |
| 11. | Chaudhary Waqas, SST (B/C) GHIS Miranabad 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 Umar Javed SST (B/C) GHIS 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 /2018/SSTs/Pay Protection.

Dated 19-09-2020

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 GHSS/GHS.

[Signature]
 District Education Officer (M)
 Abbottabad

[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.No. | 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-UI-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.

Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar. G.O. (S&T) No. 22/2014/S&T/contract dated 16-02-2014 and Director of Secondary Education, Khyber Pakhtunkhwa, Peshawar, Notification No. US42-09/2014/S&T (M) pay protection / regularization dated 25-01-2014, and consequent upon regularization of all teachers / employees appointed on "Adhoc / Contract basis" through NTS during the period / years 2014 / 2015 / 2016 / 2017 and 2018, (they are allowed "Pay Protection" towards their "Past / Previous Service" rendered by the following "Adhoc / Contract Employees / 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 Past / 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 GUMI GATE | EDUCATION DEPARTMENT |
| 2 | MR. FAYAD ALI DURRANI, CT GSOZCAMSS NO.2 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 3 | MR. KAMRAN, CT GMS PAHARI PURA | EDUCATION DEPARTMENT |
| 4 | MR. WAJID ALI, CT GMS DAAG | EDUCATION DEPARTMENT |
| 5 | MR. MUHAMMAD JANAS KHAN, CT GMS MATHERA | EDUCATION DEPARTMENT |
| 6 | MR. MUHAMMAD SAQIB, PET GMS GUL ABAD | EDUCATION DEPARTMENT |
| 7 | MR. MUHAMMAD ILYAS, CT GMS ZAFAR COLONY | EDUCATION DEPARTMENT |
| 8 | MR. SARAI UL HAQ, CT GMS LAHAMA | EDUCATION DEPARTMENT |
| 9 | MR. NABI GUL, CT GSHSHSS NO.1 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 10 | MR. MALIK FAIZAN, CT GSHSHSS NO.1 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 11 | MR. MUHAMMAD SALAMAN, CT GSHSHSS NO.1 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 12 | MR. ASIF ALI, CT GSOZCAMSS NO.2 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 13 | MR. SAWA ULLAH, CT GMS SHERKERA | MINISTRY OF DEFENCE |
| 14 | MR. ISRAR ULLAH, CT GMS SHER DAD | EDUCATION DEPARTMENT |
| 15 | MR. SHIMAZ ASLAM, CT GSOZCAMSS NO.2 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 16 | MR. NAJIB RAHMAN, CT GSOZCAMSS NO.2 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 17 | MR. SAID WAZIR KHAN, CT GSOZCAMSS NO.2 PESHAWAR CITY | EDUCATION DEPARTMENT |
| 18 | MR. WAQAR YOUSAF, CT GSHSHSS NO.3 PESHAWAR CAMP | EDUCATION DEPARTMENT |
| 19 | MR. DAWOOD KHAN CT, GMS TAKHT AGAD | EDUCATION DEPARTMENT |
| 20 | MR. TAHIR ULLAH CT, GMS TAKHT AGAD | EDUCATION DEPARTMENT |
| 21 | MR. HEJAB ULLAH CT, GMS GMS MASHEED CAMP | EDUCATION DEPARTMENT |
| 22 | MR. REHAN ULLAH CT, GMS GMS MASHEED CAMP | EDUCATION DEPARTMENT |
| 23 | MR. A.I. BASHIR CT, GMS TAKHT AGAD | EDUCATION DEPARTMENT |
| 24 | MR. LUQMAN KHAN CT, GMS PUSHTAKHARA PAKISTAN | EDUCATION DEPARTMENT |
| 25 | MR. ALI RAHMAN CT, GMS GULI BERA | EDUCATION DEPARTMENT |
| 26 | MR. AZIZ UH RAHMAN, CT GMS PUSHTAKHARA PAKISTAN | EDUCATION DEPARTMENT |
| 27 | MR. WAQAR UH DIN, CT GMS AZAKHEL MATTANI | EDUCATION DEPARTMENT |
| 28 | MR. WAJID KHAN, CT GMS TERKAL PAKISTAN | EDUCATION DEPARTMENT |
| 29 | MR. MUHAMMAD SULMAN, CT GMS MISS NAHADI | EDUCATION DEPARTMENT |
| 30 | MR. ASHAQ KHAN, CT GMS CHARPARIZA | EDUCATION DEPARTMENT |
| 31 | MR. MUSA KHAN, CT GMS MISS NAHADI | EDUCATION DEPARTMENT |
| 32 | MR. TAZUZZAMAN, CT GMS UZBID KHELI | EDUCATION DEPARTMENT |
| 33 | MR. SHARIF MUSSAIN, CT GMS KAGA WALA | EDUCATION DEPARTMENT |
| 34 | MR. MUDASSIR AHMAD, CT GMS AZAKHEL MATTANI | EDUCATION DEPARTMENT |
| 35 | MR. JAVED AHMAD, CT GMS AZAKHEL MATTANI | EDUCATION DEPARTMENT |
| 36 | MR. TAHIR NASIM, CT GMS GULSHAN RAHMAN COLONY | EDUCATION DEPARTMENT |
| 37 | MR. KIFAYAT ULLAH, CT GMS KAFOOR DHERI | EDUCATION DEPARTMENT |
| 38 | MR. SHERDIL KHAN, CT GMS KAFOOR DHERI | EDUCATION DEPARTMENT |
| 39 | MR. NIGAR AHMAD, CT GMS KAFOOR DHERI | EDUCATION DEPARTMENT |
| 40 | MR. ABDUR RAHMAN, CT GMS KAFOOR DHERI | EDUCATION DEPARTMENT |
| 41 | MR. ISRAEL ULLAH, CT GMS KAFOOR DHERI | EDUCATION DEPARTMENT |
| 42 | MR. JAVED IQBAL, CT GMS BRIGADIER | LOCAL GOVERNMENT |
| 43 | MR. SHAMID UH RAHMAN, CT GMS DADARHER | EDUCATION DEPARTMENT |
| 44 | MR. MUHAMMAD JALAL, CT GMS GULI BERA | EDUCATION DEPARTMENT |
| 45 | MR. MASOOD SHAM, CT GMS NO.1 PESHAWAR CAMP | EDUCATION DEPARTMENT |
| 46 | MR. JAVED MUHAMMAD, PET GMS CHANGHA LING | HEALTH DEPARTMENT |
| 47 | MR. ISRAEL ULLAH, CT GMS BRIGADIER | EDUCATION DEPARTMENT |

UFS

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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| 47 | | EDUCATION DEPARTMENT |

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

In pursuance of Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department Notification No. SO/SST/ES&SE/3-2/2018/SIT/Contract dated 16-02-2018, it is hereby notified for the information of all DEOs ES&SE (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. FO/(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 ES&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 rendered in other Provincial Department and ES&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 this Directorate in future.

6302-6942

(Hafiz Dr. Muhammad Ibrahim)


Director


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

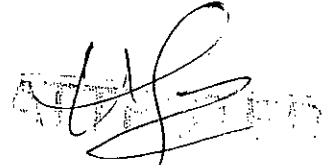
Dated Peshawar the 25/11/2019

- 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 ES&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.

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Deputy Director (Estab) 23/11/19
Elementary & Secondary Education
Khyber Pakhtunkhwa


23/11/19



**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 "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 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 rendered 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:

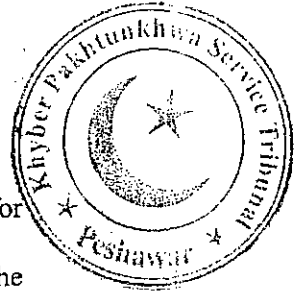
1. All District Education Officers (M/F) in Khyber Pakhtunkhwa.
2. All District Accounts Officers in Khyber Pakhtunkhwa.
3. PS to Govt. of Khyber Pakhtunkhwa E&SE Department.
4. Additional Director (Estab) in Local Directorate.
5. All Deputy Directors (M&F) in Local Directorate.
6. All Assistant Directors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

ATTESTED

"E" - 18 -

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)

Kamranullah

Certified
Secure copy
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 21-3-24
Number of Words 17
Copying Fee 5
Urgent 5/2
Total 10/2
Name of Copyist _____
Date of Completion 21-3-24
Date of Delivery of Copy 21-3-24



"F" - 19 -

To. The Director E & S Education Department U.P. Patna.

Subject: - Application/departmental Representation for
Finalization/allowing pay finalization to the
Applicant/Appellant from the date of
First appointment.

R/S


That the Appellant is in the employ of your
good self department. That the Applicant/
Appellant was firstly appointed after fulfilling
all the legal and local formalities and
started performing his duties against the
said post with effectivity.

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

That the Appellant is and Applicant appointed
in the same department and with out any Service
break. That after Regularization Act 2018 the
Service of the Appellant was regularized against
the said post, but the Salary and pay was
not fixed from the date of first appointment.

That the Appellant made various request
in this regard to the concerned officer but
in vain.

It is humbly requested that
on acceptance of this request/representation the
pay of the Applicant/Appellant may kindly be fixed
from the date of first appointment.


Yours
PST U.P.
G.D. Bhatta

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. _____ / 2024

Mr. Kifayat Ullah **APPELLANT**

VERSUS

The DEO Dir Upper **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. *عمر فاروق***
in the above mentioned case, to do all the following acts, deeds and things or any of them, that is to say;

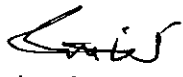
- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, 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


Signature/ thumb impression
of party / parties.

Accepted By


Umar Farooq Mohmand,


Advocate High Court, Peshawar.

Bar Council No:- 14-4822

CNIC No:- 17102-7315460-3

Cell No:- 0313-8901647

Email: umf7890@gmail.com


Waleed Adnan

Advocate High Court, Peshawar.


Muhammad Ayub

Advocate High Court, Peshawar.