


FORM OF ORDER SHEET

Court of _____

Appeal No. 593/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/04/2024	<p>The appeal of Mr. Shaukat Ali presented today by Mr. Yaqub Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25.04.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Appeal No. 593 /2024

Shaukat Ali S/O Mohammad Afzal PST Teacher GPS Nazar
Banda Swabi, R/O Nazar Banda P/O Jaganat Tehsil Razar
District Swabi,(Appellant)

VERSUS

Director of E & SE KPK Peshawar & others

.....(Respondents)

INDEX

S.No	Descriptions of Documents	Pages	From	to
1	Memo of appeal along with affidavit		1	4
2	Copy of metric certificate	A	-	5
3	Copy of CNIC	B	-	6
4	Copy of medical certificate	C	-	7
5	Copy of appointment order	D	-	8
6	Copy of Service book	E	9	16
7	Copy of Pay slip	F	-	17
8	Copy of departmental appeal dated 28-12-2023	G	18	20
9	Wakalat Nama		-	21

Appellant: شوکات علی

Shaukat Ali

Dated: 22-04-2024

Yaqub Khan
Through Counsel:

Yaqoob Khan Advocate District
Courts Mardan

(1)

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Appeal No. 593 /2024

Shaukat Ali S/O Mohammad Afzal PST Teacher GPS Nazar Banda Swabi, R/O Nazar Banda P/O Jaganat Tehsil Razar District Swabi,(Appellant)

VERSUS

1. Director of E & SE KPK Peshawar.
2. D.E.O (M) Swabi
3. District Account office Swabi.....(Respondents)

Appeal U/s 4 of Service Tribunal Act 1974, for correction of dated of birth of appellant as 22-04-1968 instead of 01-01-1965 on the basis School leaving Certificate of appellant as well as CNIC of appellant, which are necessary documents for recording of date of birth of appellant.

PRAYER:

On acceptance of this appeal, date of birth of appellant may please be corrected as 22-04-1968 instead 01-01-1965 of appellant in Service record.

.....

Sir,

Appellant humbly submits as under:

1. That appellant is posted as PST teacher in GPS Center Saprana Tehsil razar Distt Swabi.
2. That appellant has passed Metric examination in the year 1982 i.e on 11-08-1982 and issued Metric passed certificate of the appellant in which dated of birth of

appellant was mentioned 22-04-1968. **(Copy of metric certificate is annexed annex A).**

3. That on the basis of metric certificate, coupled with the Form B of Nadra office, the appellant approached for preparation of CNIC before the incharge of Nadra Swabi, who issued CNIC with the date of birth of appellant is 22-04-1968. (Copy of CNIC is attached as annex B).
4. That education department/respondents have advertized the post of PST, for which appellant properly applied, passed test/ interview and after completion of all codal formality i.e medical examination of appellant and issued medical certificate of the appellant with the date of birth dated 22-4-1968. **(Copy of medical certificate is attached as annex C).**
5. That after completion of set coudal formaility appellant was appointed as PST teacher in GPS Tor Dher No.1 District Swabi vide order darterd 17-10-1985, in which date of birth of appellant was mentioned as 22-04-1968.
(Copy of appointment order is attached as annex D).
6. That after appointment of appellant and posting of appellant, appellant was issued Service book of appellant regarding the service of appellant, in which all the contents of service of appellant including recording, date of birth of appeellant as 22-04-1968 in the service book of appellant. **(Copy of service book is attached as annex E).**
7. That after verification and completion of all codal formalities, pay of appellant was paid to the appellant through pay center of school. But after computerization of pay record of appellant, the appellant was issued pay slip of appellant for the month of Sep-2023, in which dated of birth of appellant was wrongly entered as 01-01-1965 instead of 22-04-1968, which is illegal against law, facts and appellant in entitled for correction of the same as per

the record of appellant. **(Copy of pay slip is attached is annex F).**

8. That appellant filed a departmental appeal/representation for correction of date of birth of appellant as 22-04-1968 instead of 01-01-1965 before the respondent No.1 i.e Director of E & SE Peshawar through departmental appeal/representation dated 28-12-2023 through Post office but no response has been received yet. **(Copy of departmental appeal dated 28-12-2023 is attached as annex G).**
9. That appellant is entitled for correction of date of birth of appellant as 22-04-1968 instead of 01-01-1965, which is wrongly mentioned in the pay slip of appellant on following grounds.

GROUND

- A. Because the appellant has issued Metric certificate with the date of birth of appellant dated 22-04-1968, CNIC is issued to the appellant with the same date of birth i.e 22-04-1968, Medical certificate of appellant is issued to to the appellant with the date of birth of appellant as 22-04-1968 and Service book of appellant was prepared with date of birth of appellant as 22-04-1968, so in all of these authentic documents the correct date of birth of appellant is 22-04-1968 and not 01-01-1965, so on the basis of these documents appellant is entitled for correction of date of birth as 22-04-1968 instead of 01-01-1965, for which chain of judgments regarding the date of birth has been passed by the Superior Courts.
- B. Because the entry of date of birth of appellant and pay slip as well in the record office of District account office Swabi is wrongly mention 01-01-1965b instead of 22-04-1965 , which is violation of Metric certificate of appellant, CNIC of appellant as well as Service book of

appellant, which is illegal against law and facts and appellant is entitled for correction of the same.

It is therefore humbly prayed that on acceptance of this appeal date of birth of appellant may please be corrected/entered as 22-04-1968 instead of 01-01-1965 and the pay slip as well as in the record of District office Swabi on the basis of Matric certificate of appellant , CNIC of appellant and Service book of appellant. Any other relief deemed fit may also be graciously awarded.

Appellant: شوکت علی

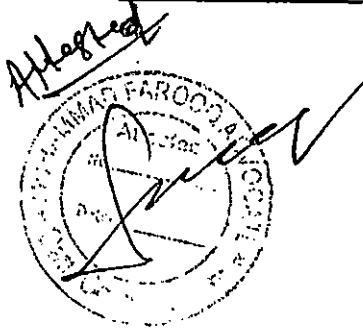
Shaukat Ali

Through Counsel: Yaqub Khan
Yaqoob Khan Advocate District
Courts Mardan

AFFIDAVIT:

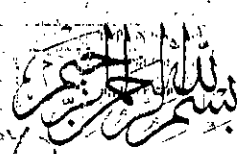
I undersigned declare on oath that the contents of the appeal of appellant are true and correct to the best of my knowledge and belief.

Deponent: شوکت علی



S. No. 378822

Roll No.

(Better Copy) 

Aux A
5

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1982 (ANNUAL)

THIS IS TO CERTIFY THAT SHAUKAT ALI

Son/Daughter of MUHAMMAD AFZAL

and a student of GOVT HIGH SCHOOL Nazal Banda Chak Zafar Hussain

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Peshawar held in April 1982 as a *Regular candidate*. He/She obtained 461 Marks out of 850 and has been placed in Grade Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|-----------------|-----------------|---------------------|
| 1. English | 3. Islamiyat | 5. PAK: STUDIES | 7. GEN. MATHEMATICS |
| 2. Urdu | 4. GEN: SCIENCE | 6. ISL: STUDIES | 8. PAKHTO |

He/She has been awarded Grade on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is TWENTY SECOND APRIL
one thousand nine hundred and SIXTY EIGHT (22-4-1968)

Asstt. Secretary

11th August, 1982

This certificate is issued without alteration or erasure.

Secretary





PAKISTAN National Identity Card



ISLAMIC REPUBLIC OF PAKISTAN

Name
Shaukat Ali

شوکت علی

Aux B



Father Name
Muhammad Afzal

محمد افضل

6



Gender Country of Stay
M Pakistan

Identity Number
16201-0724398-9

Date of Birth
22.04.1968

Date of Issue
29.03.2019

Date of Expiry
29.03.2029

Shaukat Ali

Holder's Signature

پیشہ زنگر باغ، ڈاک خانہ بکس نمبر 16201-07
ضلع سوڈان

16201-07



پیشہ زنگر باغ، ڈاک خانہ بکس نمبر 1015312410
ضلع سوڈان

1015312410
130-82-8777

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں

MEDICAL CERTIFICATE

Annex ^c

Name of Official..... Shankar A.

Cast or race..... 18th

Father's name..... Mohamed Afzal

Residence..... vill Nazim Bando chak Jambhri
Tal Gwah Dept Mardha

Date of birth..... 22.4.1968

Exact height by measurement..... 5-7

Personal mark of identification..... A black stain on right face

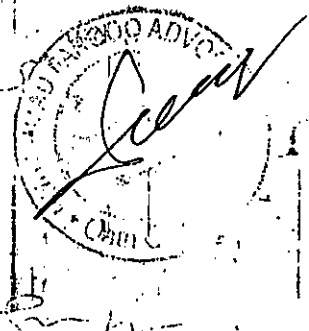
Signature of the Official..... [Signature]

Signature of head of office.....

(7)

I do hereby certify that I have examined Mr. Shankar A. a candidate for Trg employment in the office of the Dept and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except nil

PTC Teacher do not consider this as disqualification for Trg employment in the office of the Dept. His age according to his own statement, 17 appearance about Seventeen years!!



LEFT HAND THUMB AND FINGER IMPRESSIONS.....

[Handwritten impressions]

Medical Superintendent
Civil Hospital.....
Medical Superintendent
D.M.O. Hospital Mardha.

[Signature]

Aux D

8

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.

OFFICE ORDER.

APPOINTMENTS.

On arrival from P.T.O. training the following teachers are hereby appointed at the following schools noted against each in the interest of public service w.e.f. the date of taking over charge. They will get Rs. 560/300 plus usual allowances as admissible to them under the rules. They will be placed in BPS, (7) i.e. Rs. 560-23-1020 after passing their P.T.O. Examination.

S.No.	Name & Father's name and address	Place where posted.	Remarks.
1.	Mr. Bilawar Shah s/o Mir Ahmad Shah of Jamal-Garhi (Mardan).	GPS, Chail Banda. Baghdadada.	Against vacant post.
2.	Mr. Mohammad Ilyas s/o Yousaf Gul Vill: Lund Khawar.	GPS, Mira Khan Killi. (Sher Garh).	--do--
3.	Mr. Mohammad Tariq s/o Abdul Ghani Vill: Arabi Banda (Pir Abad) Mardan.	GPS, Pir Saddi,	--do--
4.	Mr. Shoukat Ali s/o Mohammad Afzal Vill: Near Banda (Swabi).	GPS, Tordher, No. 1	--do--
5.	Mr. Mohammad Nasim s/o Ali Askar of Lund Khawar. (Mardan).	GPS, Kaka Abad.	--do--

Notes-

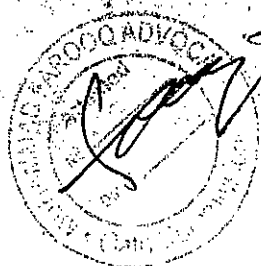
1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Their appointments are purely temporary liable to termination without any notice or assigning any reason.
4. In case of resignation they will have to give one prior notice to the Deptt: or forfeited one's month's pay in lieu thereof to the Govt:
5. They are required to produce their Health and age certificate from the Medical Supdt: D.H.Q. Hospital Mardan.

(GUL ZAMAN KHAN)
DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.

Encl: No. 26737/45 Dated Mardan the 10/10/1985

- Gopy furnished for information to the
1. S.D.S.O. (Male) Mardan.
 2. S.D.S.O. (Male) Swabi.
 3. Headmaster G.P.S. Concerned.
 4. Candidate concerned.

"HAYAT"



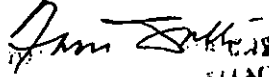
DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.

Aux E

(For use in Police Department only).

Passed SSC(A) 1982 from B. I. S. E. Peshawar under R. No 36586 obtaining 461 marks out of 850 and has been placed in grade "C" ✓

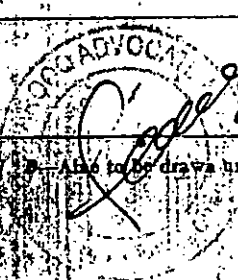
- 1.
- 2.
- 3.


 OFFICER IN CHARGE
 N.Y.

Verification Roll No. dated received back

Left thumb-impression.

Qualification	Date	Qualifications	Date
English		First Arts	
Pashtu		B. L. or B. A.	
Urdu		Pledership examination	
Plan-drawing		Training School Final examination	
Finger print		Other qualifications— PTC Entry	
Drill instructing		Passed PTC Long Course from the Govt. Elementary College of Educ. for (men) Peshawar under R/No 139 and obtained 502 marks and was placed in grade D result was declared on 31-1-1985.	
Court duties			
Reserve duties			



Also to be drawn under the qualification possessed


 OFFICER IN CHARGE

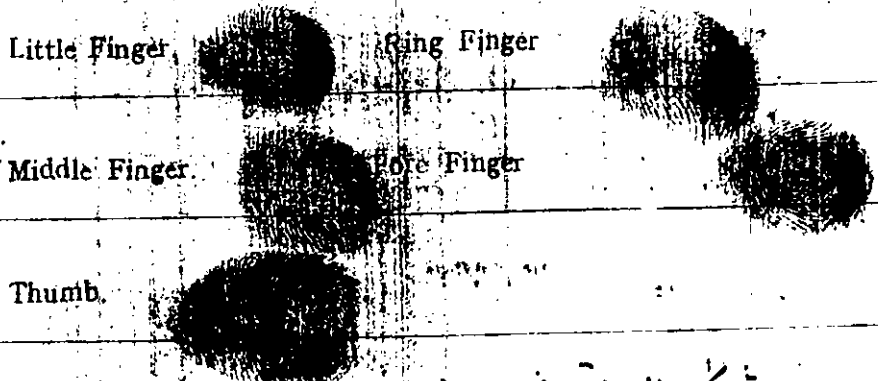
40 26228 07

10

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

- 1. Name *Shaukat Ali* ✓
- 2. Race *Afghan* ✓
- 3. Residence *V/ Nager Bamba Po Jagannath Teh. Swabi Dist. Swatan.* ✓
- 4. Father's name and residence *Mohammad Afzal* ✓
- 5. Date of birth by Christian era as nearly as can be ascertained *Twenty Second April N.H. and Sixty Eight (22.4.1968)* ✓
- 6. Exact height by measurement *5-6* ✓
- 7. Personal marks for identification *A mole on the face (F1)* ✓
- 8. Left hand thumb and finger impression of (non-gazetted) officer

10



9. Signature of Government servant *شوات علی بیگ*

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

Sub. Dir. (General Education) Swabi (M.D.M.)

R. Attest

11/1/91

Sub. Dir. (General Education) Swabi (M.D.M.)

(12)

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other employment holding under the term "Pay"	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8
PTC	BPS 10C	Rs 1230 - 79 - 2415)						
<u>Revised Entries</u>								
Ca. PS. Jagan Nath	Sub/off.	Rs 1546/- P.M.				19/9 91 (F.M.)	Sharma	S.D.B.O. (m) Lahor
do	do	Rs 1625/- P.M.				1/12 91	Sharma	S.D.B.O. (m) Lahor
do	do	Rs 1704/- P.M.				1/12 92	Sharma	S.D.B.O. (m) Lahor
do	do	Rs 1783/- P.M.				1/12 93	Sharma	S.D.B.O. (m) Lahor
do	do							(B-10) P.M.
<p>Office of the Joint General Pay fixed in Rs 1660 Rs 2409/- With rest: Rs 107-3265 (10) 1-6-1994 Joint Officer. P.W.F., Ferozepore</p>								
<u>Revised B-10 (B.1660-107-3265)</u>								
do	do	A. 2409 1/2				1/94	Sharma	M. Madh S.O. (m) Lahor
do	do	B. 2516 1/2				1/94	Sharma	M. Madh S.O. (m) Lahor
Ca. P.S. Nazim	do	B. 2623 1/2				1/95	Sharma	M. Madh S.D.B.O. (m) Lahor
do Banda	do	Rs 2730/-				1/96	Sharma	M. Madh S.O. (m) Lahor
do	do	Rs 2837/-				1/97	Sharma	M. Madh S.O. (m) Lahor

Signature

Office of the Joint General
 Pay fixed in
 Rs 1660
 Rs 2409/-
 With rest: Rs
 107-3265 (10)
 1-6-1994
 Joint Officer.
 P.W.F., Ferozepore

Revised B-10 (B.1660-107-3265)

1. Total
 4. Pay fix
 in BPS

7	8	9	10	11	12	13		14	15	
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
	Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer		Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant.
2/8	Shau	M. H. Qureshi S. D. E. O. (M) Lahor	30/11/99	A/enc	M. H. Qureshi S. D. E. O. (M) Lahor					
7	Shau	M. H. Qureshi S. D. E. O. (M) Lahor	30/11/2000	A/Sing	M. H. Qureshi S. D. E. O. (M) Lahor					Mr. Shoukat Ali P.T.C. former Head Teacher Cps Jagon Nath wana at Camps Nazir Bunder is hereby suspended from service with effect from 26-3-96 vide D.O. (M) Pri. Secy. Bd. 1066 dated 26/3/96.
2/100	Shau	M. H. Qureshi S. D. E. O. (M) Lahor	30/11/2001	A/enc	M. H. Qureshi S. D. E. O. (M) Lahor					
2/01	Shau	M. H. Qureshi S. D. E. O. (M) Lahor	12/1/2001	Revised	M. H. Qureshi S. D. E. O. (M) Lahor					
2/70	Shau	M. H. Qureshi S. D. E. O. (M) Lahor	30/11/2002	A/enc	M. H. Qureshi S. D. E. O. (M) Lahor					Re-instated w.e.f 26-3-96 vide D.O. (M) Pri. Secy. Bd. 1067-69 dated 26/3/96 vide 2669-74 dated 24-6-96
1	Shau	M. H. Qureshi Dy. D. O. (M) Lahor	4/8/2003	Transfer	M. H. Qureshi Dy. D. O. (M) Lahor					
2	Shau	M. H. Qureshi Dy. D. O. (M) Lahor	30/11/2003	A/enc	M. H. Qureshi Dy. D. O. (M) Lahor					Services Verified w.e.f 1/12/95 to 30/11/95 from the office record
3	Shau	M. H. Qureshi Dy. D. O. (M) Lahor	30/11/2003	A/enc	M. H. Qureshi Dy. D. O. (M) Lahor					
3	Shau	M. H. Qureshi Dy. D. O. (M) Lahor	30/11/2004	A/enc	M. H. Qureshi Dy. D. O. (M) Lahor					Services Verified w.e.f 1/12/95 to 30/11/95 from the office record
4	Shau	M. H. Qureshi Dy. D. O. (M) Lahor	30/6/2005	Revised	M. H. Qureshi Dy. D. O. (M) Lahor					

M. H. Qureshi
Sub Divisional Education officer
(Male) - Lahor

M. H. Qureshi
Sub Divisional Education officer
(Male) - Lahor

M. H. Qureshi
Sub Divisional Education officer
(Male) - Lahor

M. H. Qureshi
Sub Divisional Education officer
(Male) - Lahor

Signature of the head of the office or other attesting officer

7	8	9	10	11	12	13		14	15
						Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
2	Shau	Mohammad S. D. E. O (M) Lahor	30/11/99	A/enc	Mohammad S. D. E. O (M) Lahor		Mr. Shaukat Ali P.T.C. former Head Teacher Cps Jagon Nath now at G.M.P.S Nazim Banda is hereby suspended from service with effect from 26-3-96 vide D.O. (M) P.W. Secy Bd 1066 dated 26/3/96.		
7	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2000	A/Sing	Mohammad S. D. E. O (M) Lahor				
2	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2001	A/enc	Mohammad S. D. E. O (M) Lahor				
2	Shau	Mohammad S. D. E. O (M) Lahor	1/12/2001	Revised	Mohammad S. D. E. O (M) Lahor				
2	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2001	A/enc	Mohammad S. D. E. O (M) Lahor				
1	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2002	A/enc	Mohammad S. D. E. O (M) Lahor				
2	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2003	Trouble	Mohammad S. D. E. O (M) Lahor				
3	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2003	A/enc	Mohammad S. D. E. O (M) Lahor				
3	Shau	Mohammad S. D. E. O (M) Lahor	30/11/2004	A/enc	Mohammad S. D. E. O (M) Lahor				
3	Shau	Mohammad S. D. E. O (M) Lahor	30/6/2005	Revised	Mohammad S. D. E. O (M) Lahor				

Mohammad
Sub Divisional Education officer
(Male) - Lahor

Re-instated w.e.f 26-3-96 vide D.O. (M) P.W. Secy Bd 1067-69 dated 26/3/96

Mohammad
Sub Divisional Education officer
(Male) - Lahor

Services Verified w.e.f 30/11/95 From The office Record

Mohammad
Sub Divisional Education officer
(Male) - Lahor

Services Verified w.e.f 30/11/99 From The office Record

Mohammad
Sub Divisional Education officer
(Male) - Lahor

Signature

Sawabi
 S#:1 P Sec:003 Month:September,2023
 SU6303 -Government Primary School:
 Govt. Primary Schools Raz
 Pers #: 00234653 Buckle:
 Name: SHAUKAT ALI
 PRIMARY SCHOOL HEAD TEACH
 CNIC No.1620107243949
 GPF Interest Applied
 15 Vocational Permanent SU6303 -09
 PAYS AND ALLOWANCES:
 0001-Basic Pay 75,400.00
 1001-House Rent Allowance 45% 3,524.00
 1210-Convey Allowance 2005 2,856.00
 1300-Medical Allowance 1,500.00
 2148-15% Adhoc Relief All-2013 975.00
 2199-Adhoc Relief Allow @10% 649.00
 2316-Teaching Allowance 2021 3,224.00
 2341-Dispr. Red All 15% 2022KP 7,406.00
 2347-Adhoc Rel Al 15% 22 (PS17) 7,406.00
 Gross Pay and Allowances 129,330.00
 DEDUCTIONS:
 IT Payable 33,183.18 Deducted 11,063.00 TAX: (3609) 3,687.00
 GPF Balance 798,483.00 Subrc: 4,290.00
 3501-Benevolent Fund 1,200.00
 3990-Emp.Edu. Fund KPK 135.00
 4004-R. Benefits & Death Comp: 600.00

Total Deductions 9,912.00
 119,418.00

D.O.B 01.01.1965 LFP Quota:
 37 Years 11 Months 015 Days HABIB BANK LIMITED YAR HUSSAIN (LAHORE)
 14400005605701

Sawabi
 S#:2 P Sec:003 Month:September 2023
 SU6303 -Government Primary Schools
 Govt. Primary Schools Raz
 Pers #: 00234653 Buckle:
 Name: SHAUKAT ALI
 PRIMARY SCHOOL HEAD TEACH
 CNIC No.1620107243949
 GPF Interest Applied
 15 Vocational Permanent SU6303 -09
 PAYS AND ALLOWANCES:
 2378-Adhoc Relief All 2023 35% 26,390.00
 Gross Pay and Allowances 129,330.00
 DEDUCTIONS:
 IT Payable 33,183.18 Deducted 11,063.00
 GPF Balance 798,483.00 Subrc:

Total Deductions 9,912.00
 119,418.00

D.O.B 01.01.1965 LFP Quota:
 37 Years 11 Months 015 Days HABIB BANK LIMITED YAR HUSSAIN (LAHORE)
 14400005605701

Ans F
 17

To
The director E & SE
KPK Peshawar.

Anx G

(18)

Subject: D/Appeal / Representation for Correction
of Date of Birth of Appellant that is 27-4-1968
instead of 01-01-1965 on the basis of CNIC
of appellant, matric Certificate of appellant &
appointment order of appellant & Service book
of appellant.

Sir

Appellant humbly submit as under:

- 1) That appellant is posted as PST Teacher in
GPS Center Suprona Tehsil: Razzar Distt Swabi
- 2) That appellant has passed matric examination in the year
1982 is dated 11-08-1982, in which DOB is 22-04-1968.
(copy of matric certificate is attached as Anxx "A").
- 3) That on the basis of matric certificate
couple with the Form-B of NADRA office, the
appellant approached before incharge of NADRA
office swabi, for issuing of CNIC, who
issued CNIC with date of Birth of appellant
is 22-04-1968.
(copy of CNIC is attached as Anx "B").
- 4) That education department have advertised the
Post of PST, for which appellant has
properly applied, passed test / interview and
after completion of all code formalities i.e
medic examination of appellant and issued
medic certificate to the appellant with the
date of Birth dated 22-04-1968.
(copy of medic Certificate is attached as Anx "C").

(19)

- 5, That after completion of all Codel formalities, appellant was appointed as PST Teacher in GPS Tordeer No.1 vide order dated 17-10-1985, in which DOB of Appellant is 22nd/₁₉₆₈ (copy of appointment order is attached As Annex-D").
- 6, That after appointment of appellant, appellant has issued service book to the appellant regarding the service of appellant, in which all the contents of service of appellant including entry of Date of Birth of appellant is 22-04-1968. (copy of service book of appellant is attached as Annex-E").
- 7, That after verification and completion of all Codel formalities, pay of appellant were granted to the appellant through pay center of School, but after computerization of Pay of appellant, appellant was issued payslip of appellant for the month of September 2023, in which DOB of appellant wrongly entered 01-01-1965 instead of 22-04-1968, which is illegal against law and facts and liable for correction on the following grounds.

Grounds:

- A, Because the appellant has issued matric certificate with the date of Birth of appellant dated 22-04-1968, CNIC is issued with same Date of Birth 22-04-1968, medicine certificate of appellant with Date of Birth of appellant 22-04-1968 and service book of appellant with DOB 22-04-1968, so in all of the Documents

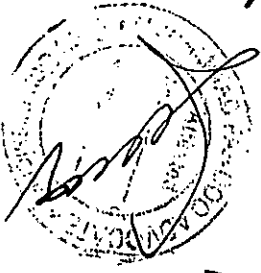
of appellant have entered Date of Birth
of appellant is 22/4/1968, so it strange enough
that why and how the district account office
swabi has issued pay slip of appellant
with the entry of Date of Birth of
appellant 01-01-1965 instead of 22-04-1968
against the entries in all documents of
appellant i.e. matric certificate, CNIC cards,
medic certificate and Service book of
appellant, so appellant is entitled for
correction of Date of Birth from 01-01-1965
into 22-04-1968 in the pay slip of
appellant.

B, Because the entry of Date of Birth
of appellant in pay slip as well as in the
record of office of District education office
Swabi - as 01-01-1965 instead of 22-04-1968
is illegal against law and facts regard
and liable for correction of the same.
the appellant is entitled for correction
of the same.

It is therefore humbly requested that
date of birth of appellant may please be
corrected/entered as 22-04-1968 instead of
01-01-1965

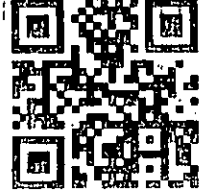
Date: 19/8/12/2023

a cordingly. Louis for ally
Shoukri Ad. PST-Section CR-Case



سرٹیفکٹ نمبر: 13533

قیمت 100 روپے



ڈسٹرکٹ بار ایسوسی ایشن مردان

ایڈریس:

بار کونسل ایسوسی ایشن نمبر:

رابطہ نمبر:

بعدالت جناب:

منجانب:

دعویٰ مقدمہ

مرحہ:

نمبر:

تاریخ:

بینام

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام کیلئے کو وکیل مقرر

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زر پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ برداشتہ منظور قبول ہوگا۔

دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہوں گے۔

نیز بقایا و خرچہ کی وصولی کا بھی اختیار ہوگا۔ اگر کسی تاریخ پیشی پر وکیل موصوف دورہ پر ہو یا مقام سے باہر ہو یا بیمار ہو یا کوئی ضروری کام ہو تو وکیل صاحب یا بندہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے۔

الرقوم: _____ مقام _____ کے لئے منظور ہے۔

دستخط وکیل موصوف

منظور تصدیق شدہ

نوٹ اس وکالت نامہ کی فوٹو کاپی نام قابل قبول ہوگی۔



Location: Nowshera GPO
Date/Time: 28/12/2023 15:13
Article No: RGT 105929284
Recipient: DIRECTOR
FSH
Peshawar

Contact No.:
Sender: YAQUB KHAN
NSR
Nowshera

Contact No.: 1111111111

Weight: 30gm.

Tariff: 00Rs

TOTAL: 00Rs

CEO: ZUBAIR NSR GPO

Inquiry No.: 111-111-117051-848708 / 8840360

For Tracking: www.ep.gov.pk

Please make photo copy of the receipt to keep as evidence.

PN: 9010405