

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

C.M (documents) NO. _____ /2024

IN

Service Appeal No. 885/2020

Habib Ul Haq

V/S

Govt: of KP etc.

INDEX

S.No	Documents	Annexure	Page No.
1.	Memo of Application	-----	01-02
2.	Affidavit	-----	03
3.	Copy of LPC	--A1--	04
4.	Copy of Recommendation	--A2--	05
5.	Copy of inter district performa	--A3--	06
6.	Copy of post availability certificate	--A4--	07
7.	Copy of Service Book	--A5--	08-13

H. Ul Haq
APPELLANT

Habib Ul Haq

THROUGH:

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT
OF PAKISTAN.

Room No.FR-08, 4th Floor,
Bilour Plaza Peshawar Cantt:
Cell # 0312-9103240

24-05-24
peh

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

C.M (documents) NO. _____/2024

IN

Service Appeal No. 885/2020

Habib Ul Haq, T.T
GHS Kadar, Swabi.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12708

Dated 13-05-2024
(APPELLANT)

VERSUS

1. The Secretary (E&SE) Govt: of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Director of Education (E&SE) Khyber Pakhtunkhwa.
3. The District Education Officer (Male), Swabi.
4. The Secretary to Govt: Of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.

(RESPONDENTS)

.....
**APPLICATION FOR PLACING ON FILE CERTAIN
DOCUMENT ATTACHED HEREWITH THE
APPLICATION FOR PERUSAL OF HONORABLE
COURT TO MEET THE END OF JUSTICE.**

RESPECTFULLY SHEWETH:

1. That the above service appeal is pending before this Hon'ble Tribunal.
2. That certain documents which has been provided to the appellant after the institution of instant service appeal so therefore, the appellant wants to file these documents for the perusal of Honorable Tribunal to meet the ends of justice and to reach the fair conclusion.
3. That the attached document with this application is hereby annexed as Annexure A1-A5 respectively.
4. That there is no legal hurdle for allowing the CM in the interest of justice.

It is, therefore, most humbly prayed that the application may be allowed and the attached document may please be considered as a part of the service appeal for perusal of Honorable Tribunal to meet the ends of justice and to reach the fair conclusion. Any other remedy which august Court deems fit and appropriate that may also be awarded in favour of appellant.

Huq
APPELLANT

Habib Ul Haq

THROUGH:

Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT
OF PAKISTAN.

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

C.M (documents) NO. _____/2024

IN

Service Appeal No. 885/2020

Habib Ul Haq

V/S

Govt: of KP etc.

.....
AFFIDAVIT

I, Habib Ul Haq T.T GHS Kadar, Swabi(appellant), do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge and belief.

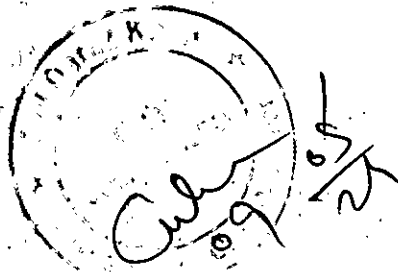
Hu-

DEPONENT

Habib Ul Haq

IDENTIFIED BY:-

**(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT
OF PAKISTAN.**



A1

4

No _____

(Provincial)

Office Case _____

LAST PAY CERTIFICATEMr./Miss/Mrs. Habib Ul HaqSon/Daughter of Qazi Amin Ul Haqof the G.H.S Pattan KohistanProceeding on Transfer To G.H.S Qadya (G) Swabito Vide DES K.P.K Peshawar Endst No. 5110-G dated 31-7-20061. He/She has been paid up to 31-7-2006

at the following rates :-

Particulars	Rates
Substantive pay	<u>3815/-</u>
Officiating pay	<u>H.R.A 1059/-</u>
Exchange Compensation Allowance	<u>Medical AI 500/-</u>
U.A.A	<u>75/-</u>
Dearness AI	<u>383/-</u>
Total Amount	<u>5832/-</u>

DEDUCTIONS

B.F.	<u>35</u>
A.G.i.	<u>7</u>
G.i.	<u>67</u>
E.E.F	<u>113</u>

2. He/She has made over charge of the office of G.H.S Qadya (G) Swabi on the 2-8-06 noon of the 2-8-06

3. Recoveries are to be made from the pay of the Government Servant as detailed on the reverse.

4. He/She has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

Period	Rate	Amount
From _____ to _____ at Rs. _____ a month		Rs. _____
From _____ to _____ at Rs. _____ a month		Rs. _____
From _____ to _____ at Rs. _____ a month		Rs. _____

5. He/She is entitled to draw the following :-

Scale of pay is _____ Vide S. Slip from A. G. Punjab
 No. _____ dated _____ Increment accrues on _____ every year and
 this may be drawn in the absence of instructions to the contrary from the
 Accountant-General, Punjab.

6. He/She is also entitled to joining time for _____ days.

7. The details of the Income-tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

Dated _____

No. 147-15 Dated 31-7-2006

Forwarded to The:-

Head Master G.H.S Qadya (G) Swabi

(Signature)

District Officer (M)
S&L, District Kohistan

(Designation)

ATTESTED

5

RECOMMENDATION

I hereby recommend and certify that Mr/Mst -Habib Ul Haq----- is working as trained teacher at give name of school GHS Pattan District Kohistan Kohistan his/her service book and other document verified and found complete upto 07.01.2025 he/she is on the active roll this District his/her performance is satisfactory. His/Her service record has been verified by his/her service documents upto-----

1.4. the following documents duly attested by me and attested by

- a. Academics: SSC, HSSC, BA/B.Sc, MA/MS.
- b. Professional: PTC, C.T, B.Ed, M.Ed.
- c. Service w.e.f 07.10.96 to date is verified
- d. Domicile certificate of District Swabi
- e. NID Card 16202-0883010-1

NAME _____

Signature _____

Dated _____

Endst No. 72

Dated 06.07.2005

Forwarded to the Executive District Officer (Schools and Literacy) of District Swabi for post availability on the enclosed proforma and onward submission to Director Schools and Literacy NWFP Peshawar

Executive District Officer
(School and Literacy)


ATTESTED

90

5

RECOMMENDATION

I hereby recommend and certify that Mr/Ms Habib-Ul-Haq
 is working as a trained teacher at (give name of school) G. H. S. Pattan
 District Kohistan His/Her service book and other documents
 verified and found complete upto 7-7-2005 He/She is on the active roll of
 this District and his/her performance is satisfactory. His/Her service record has been
 verified by his/her service documents upto 7-7-2005

14. The following documents duly attested by me are attached with (Please tick)

- a. Academics: SSC, HSSC, BA/BSc, MA/MT
- b. Professional: PTC, CT, B.Ed, M.Ed
- c. Service v.e.f. 7-10-96 to State is verified
- d. Domicile Certificate of District Swabi
- e. NID Card 18902-0882010-1

Executive District Officer (S&L)

Name Abdus Rabbani

Signature [Signature]

Date 5/7/05
 Executive Distt. Office
 (Schools & Literacy)
 Distt. Kohistan

Endst. No. 70

Dated 6/7/05

Forwarded to the Executive District Officer (Schools and Literacy) of
 District Swabi for post availability on the enclosed programs and onward
 submission to Director Schools & Literacy NWFP Peshawar.

[Signature]
 Executive District Officer
 (Schools & Literacy)

[Signature]
 ATTESTED

DIRECTORATE OF SCHOOLS AND LITERACY NWFP.Application form for itner district transfer of primary, secondary and high secondary schools teachers.


1. Name of the Teacher/applicant HABIB UL HAQ
2. Father's Name QAZI AMIN UL HAQ
3. District of Domicile SWABI
4. Date of Birth 02.03.1975
5. Permanent address Qazi abad P.O Dagi
6. a. Designation T.T
- b. Grade Original BPS 07
- c. Date of taking over charge against the vacant post 07.10.1996
7. Name of present school of posting
(GPS/GSS/GHSS G.H.S Pattan Kohistan GHS Pattan Kohistan.
8. Tenure of service in the present school from ____ to ____
9. Academic qualification S.S.C (Matric) S.S.C (Matric)
10. Professinal Qualification PTC+Sanad ul fira
11. Service Record:-
 - a. Data of appointment 07.10.1996
 - b. Post at the time of 1st appointment T.T
 - c. Present post T.T
 - d. Present Grade 07
 - e. Date of taking over charge to present grade/post 07.10.1996
12. Reason for transfer too much distance from home to the duty station.
13. Name of distirct where transfer is desired Swabi

I Solemnly declare that all these information from Sr. No. 01 to 13 are correct.

Signature-----

Name of applicant-----

ID Card No. 16202-0882110-1


ATTESTED

11

A3

6

**DIRECTORATE OF SCHOOLS AND LITERACY
NWFP**

Application form for inter-district transfer of Primary, Secondary & High
Secondary Schools' teachers

1. Name of the Teacher/Applicant..... HABIB UL HAQ
2. Father's Name..... QAZI AMIN UL HAQ
3. District of Domicile..... Sov AB
4. Date of Birth..... 02.03.1975
5. Permanent Address..... Village Kaddi (Gora Abd) P.O. Daga
6. a. Designation..... T.T.
b. Grade (Original BPS)..... 07
c. Date of taking over charge against the present post..... 07.10.1996
7. Name of Present School of Posting (GPS/GSS/GHSS)..... G.H.S. Pattan (Kohistan)
8. Tenure of Service in the present school from..... to.....
9. Academic Qualification..... S.S.C. (Maths)
10. Professional Qualification..... P.T.C. + Sanad ul Fiza
11. Service Record:
 - a. Date of 1st Appointment..... 07.10.1996
 - b. Post at the time of 1st Appointment..... T.T. (Permanent)
 - c. Present Post..... T.T.
 - d. Present Grade..... 07
 - e. Date of taking over charge to present grade/post..... 07.10.1996
12. Reason for Transfer..... Too much distance from home
(conductivity etc.)
13. Name of District where transfer is desired..... Sovabi

I solemnly declare that all these information from Sr. No. 1 to 13 are correct.

Signature..... H. Habib

Name of Applicant Habib ul Haq

ID Card No. 11.207-0882-110-1

OFFICE OF THE EXECUTIVE DISTRICT OFFICER

District/Attorney

(7)

POST AVAILABILITY CERTIFICATE

I have no objection to the transfer of Mr/Mst HABIB UL HAQ of GPS/GGPS/GSS/GGHSS/GHSS G.H.S Pattan Kohistan against the vacant post of T.T at (name of school)-----G.H.S Qadre (G) of District Swabi

I have also examined his/her relevant documents as mentioned at Sr. No. 14

Name of the E.D.O

Signature-----

Date 20.07.2006

Endst----1321 dated 22.7.2006

Forwarded alongwith the necessary documents to Director Schools Literacy NWFP, Peshawar for further necessary action please.

Signature-----

Executive Officer-----

District-----

Note:

Executive District Officers are requested to examine the application and send post availability report to the Director Schools or literacy NWFP.


ATTESTED

69
OFFICE OF THE EXECUTIVE DISTRICT OFFICER (S&L) 14

District/Agency Swabi

POST AVAILABILITY CERTIFICATE

7

I have no objection to the transfer of Mr/Ms HABIB UL HAQ
of GPS/GGPS/GSS/GGHS/GHSS/ P.H.S. Pattan (Kohistan) against
a vacant post of T.T. at (name of school)
G.M.S. Dadra (G.) of District Swabi

I have also examined his/her relevant documents as mentioned at Serial No. 14.

Name of the E.D.O. Saifur Rehman

Signature

Date 20-7-2006

Endst: 1321 Dated: 20-7-2006

Forwarded alongwith the necessary documents to Director, Schools & Literacy NWFP, Peshawar for further necessary action please.

Signature (SAIFUR REHMAN)

Executive Officer (Schools & Literacy)

District Swabi

Note:

Executive District Officers are requested to examine the application and send post availability report to the Director, Schools & Literacy NWFP.

ATTESTED

(For use in Police Department only).

AS.
(8)

Heirs,

- 1.
- 2.
- 3.

1- Passed SSC Exam for BISE
 Peshawar under Roll No. 25844
 held in 1983.

2- Passed Sanad-ul-Fasih
 for Dar-ul-Uloom Islamiyah
 Annual-ul-Uloom under
 held in 1996.

Verification Roll No.

dated

received back

[Signature]
 Distt. Ed. Officer,
 (M&F) Secy: Kohistan,

Left Thumb Impression

Qualification	Date	Qualification	Date
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications—	
Drill Instructing			
Court Duties			
Reserve Duties			

[Handwritten signature]
 [Illegible text]

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.

9

Name: Habib-ul-Haq

Race: _____

Residence: Village Dagi Huddi Dagi Abad
Diba and Tetill Swabi



Father's name and residence: Dagi Amin-ul-Haq



Date of birth by Christian era as nearly as can be ascertained: 02.03-1925

Exact height by measurement: 5' 6"

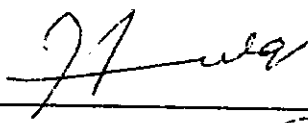
Personal marks for identification: Nil

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger:  Ring Finger: 

Middle Finger:  Fore Finger: 

Thumb: 

Signature of Government Servant: 

Signature and designation of the Head of the Office, or other Attesting Officer. 
Dist: Edn: Officer,
(M&F) Secy: Kohistan


ATTESTED

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art 371 C S P	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term 'Pay'	Date of Appointment	Signature of Government Servant
(BPS 7-1480-81-2595)							
TI GHS Patten adyast at GMS. Gushal Koyal.				RS	1480/ann	10 7/96	7/11/99
							7/11/99
							7/11/99
Do				RS-	1561/ann	12 1/95	7/11/99
							7/11/99
Do				RS	1642/ann	12 1/98	7/11/99
Do				RS	1723/ann	12 1/99	7/11/99
GMS Gulab Singh Dargah				RS	1804/ann	12 1/2000	7/11/99
Pay scale Revised w.e.f 1-12-2001 BPS 7-2230-125820 Pay an - 1-12-2001 - 2592/ann =							
GHS Patten					2890/-	12 1/2001	7/11/99
Do					2940/-	12 1/2002	7/11/99
Do					3010/-	12	7/11/99

Name and Designation of the officer attesting of termination of appointment to B.	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan	30/11/76		<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan		All/entire as T.1 Galcher in BPs 7 (1480-61-3595 Please see DEO (M) Secy Kohistan & see No Dated 7-10-1896		
<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan	30/11/97	also	<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan		Service verified w.e.f. 7-10-96 to 30/11/97 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan	30/11/98	A/m	<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan		Service verified w.e.f. 1-10-23 to 30/11/98 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan	30/11/99		<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan		Service verified w.e.f. 3-10-11/23 to 30/11/99 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan	30/11/2000	A/m	<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan		Service verified w.e.f. 3-10-11/23 to 30/11/2000 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan	30/11/01		<i>[Signature]</i> Distt. Edr. Officer, (M&F) Secy. Kohistan		Service verified w.e.f. 3-10-11/23 to 30/11/01 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer (M), Kohistan	20-11-2002	A/m	<i>[Signature]</i> Distt. Edr. Officer (M), Kohistan		Service verified w.e.f. 1-12-2002 to 20-11-2002 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer (M), Kohistan	30-11-2003	A/m	<i>[Signature]</i> Distt. Edr. Officer (M), Kohistan		Service verified w.e.f. 1-12-2002 to 30-11-2003 from the Acq: Rolls & Other Office record kept in this office		
<i>[Signature]</i> Distt. Edr. Officer (M), Kohistan	30-11-04	A/m	<i>[Signature]</i> Distt. Edr. Officer (M), Kohistan		Service verified w.e.f. 1-12-2002 to 30-11-04 from the Acq: Rolls & Other Office record kept in this office		

ATTESTED

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
TT gms		BPS-7 (2720-120-58.20)					
Ghishal kargul			Rs. 3180/-			12/24	Hulq
		BPS-7 (Rs-2555-145-67.55)					Hulq
— 170 —				3675/-		17/05	Hulq
— 170 —				3815/-		12/2005	Hulq
T-T							
GHS Qadra (S) Sani			Rs: 3815/-	PM		28/2006	
ATTESTED							

10	11	12	13		14	15	
			Leave				
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government			
Signature of the head of the office or other attesting officer.	Reason of termination (such as promotion, transfer, dismissal, etc.)	Date of termination or appointment	Designation of the officer	Period	Government to which debitabale	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
<p><i>[Signature]</i> District Officer (M) S & A, District Koblenz</p>	<p>A/nc.</p>	<p>30/05</p>	<p><i>[Signature]</i> District Officer (M) S & A, District Koblenz</p>	<p>Service verified wof 1-12-04 to 30-11-05 for Aeg. Roll's & other record of this office</p>	<p><i>[Signature]</i> District Officer (M) S & A, District Koblenz</p>		
<p><i>[Signature]</i> District Officer (M) S & A, District Koblenz</p>	<p>Transf. to S & A, District Koblenz</p>	<p>2/06</p>	<p><i>[Signature]</i> District Officer (M) S & A, District Koblenz</p>	<p>Service verified wof 1-12-2005 to 01-8-2006 for Aeg. Roll's & other office record.</p>	<p><i>[Signature]</i> District Officer (M) S & A, District Koblenz</p>		

ATTESTED