

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL No. 266 /2024

MUHAMMAD KARAM KHAN

VS

EDUCATION DETP:

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APPELLANT

THROUGH:


**KAMRAN KHAN
ADVOCATES**

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 266 /2024

Mr. Muhammad Karam Khan, Drawing Master,
GHS Chail District Swat.

.....APPELLANT

VERSUS

- 1- The Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Swat.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED INACTION OF THE RESPONDENTS BY NOT ADJUSTING THE APPELLANT AGAINST HIS POST OF DRAWING MASTER AND AGAINST THE INACTION BY NOT DECIDING THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD ON NINETY DAYS.

PRAYER:

That on acceptance of this appeal the respondent may please be directed to adjust/ post the appellant as Drawing Master in GHS Chail District Swat. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant is initially appointed as Drawing Master in the respondent department vide order dated 01.04.1987. Copy of the appointment order is attached as annexure**A.**
- 2- That in pursuance to the order ibid the appellant started performing his duties and his service book was also prepared by the concerned officer. Copy of the service book is attached as annexure**B.**
- 3- That since his appointment the appellant had performed his duty with zeal and zest and up to the entire satisfaction of his superior.

4- That ...

5- That it is pertinent to mention here on the expiry of the leave period the appellant did not join the duty due to enmity and frequent threats from the Taliban groups in the locality and in the year 2017 the appellant submitted his arrival report and an application for the grant of EOL and his adjustment. Copies of the arrival report and application are attached as annexure**E.**

6- That since the application mentioned above no order of adjustment was made by the competent authority, however the appellant was assured that his matter would be resolved soon but nothing has been done by the competent authority, hence feeling aggrieved from the inaction of the competent authority the appellant preferred departmental appeal before the appellate authority. Copy of the departmental appeal is attached as annexure**F.**

7- That vide letter dated 15.09.2023 comments were asked from the respondent No. 2 but till date no order has been made. Copy of the letter dated 15.09.2023 is attached as annexure**G.**

8- That appellant having no other remedy but to file the instant appeal on the following grounds inter alia.

GROUND:

A-That the impugned inaction of the respondents by not adjusting/ posting the appellant is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

B-That the appellant has not been treated by the respondents in accordance with law and rules 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 respondent department acted in arbitrary and mala fide manner while not posting/ adjusting the appellant against any post of DM.

D-That the impugned inaction of the respondents by not adjusting/ posting is affecting the right of pay of the appellant as he will withdraw pay against a post but respondents are reluctant to adjust/ post the appellant and such act of the respondent are in violation of Section 17 of the K.P Civil

Dated: 25.01.2024

3

M/K
APPELLANT
MUHAMMAD KARAM KHAN

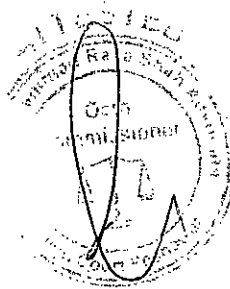
THROUGH: *Kamra*
KAMRA KHAN

Waleed
WALEED ADNAN
ADVOCATES

AFFIDAVIT

I do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing have been concealed from this Honorable tribunal.

M/K
DEPONENT



Signature

④

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. _____/2024

MUHAMMAD KARAM KHAN VS EDUCATION DETP:

APPLICATION FOR FIXATION OF THE MENTIONED
APPEAL BEFORE THE PRINCIPAL BENCH AT PESHAWAR.

R/SHEWETH:

- 1- That the above-mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That matter pertains to the camp court swat, however the council of the appellant practice in Peshawar, therefore the instant appeal is required to be fixed at the principal bench at Peshawar.

It is therefore, most humbly prayed that on acceptance of this application the titled appeal be fixed before the principal bench at Peshawar.

Dated: 25.01.2024

THROUGH:

APPLICANT


KAMRAN KHAN
ADVOCATE

(5) (A)

OFFICE OF THE DIRECTOR OF EDUCATION(S) MALAKAND DIVISION SWAT SAIDU SHARIF.

APPOINTMENT

The following Candidates are hereby temporarily appointed as D.M. post @ Ps. 620/-P.M. fixed plus usual allowances as admissible to them under the rules against vacant D.M. post in Schools noted against each in the interest of public service with effect from the date of their taking over charge on the following terms and conditions:-

<u>S.No.</u>	<u>Name, Qualification & address.</u>	<u>School where posted.</u>	<u>Remarks.</u>
1-	Mohammad Ghaffar, S/O Khan Bahadar Vill: Kokarai (Swat).	GHS. Patrak. Dir.	Against vacant D.M. post.
2-	Haider Ali, B.A. S/O Said Rasool, Village Panjigram Swat.	GHS. Lalqilla, Dir.	-do-
3-	Mohammad Alam, B.A. S/O Alam Zeb, Village Lilownai Swat.	GHS. Maskeni, Dir.	-do-
4-	Mohammad Ali, B.A. S/O Arsala Khan, Village & P.O. Kabal Swat.	GMS. Barikot Dir.	-do-
5-	Abdul Shakoor, B.A. S/O Mohammed Afzal Khan Vill: Thana Mlkd: Agency.	GMS. Dobando, Dir.	-do-
6-	Anwar Shah, F.A. S/O Suner Shah, Village Parona Swat.	G.S. Parabog (Chitral)	-do-
7-	Masood Gul, S/O Muga, Vill: Balogram District Swat.	GMS. Pachakalay, Dir.	-do-
8-	Gul Malook, F.A. S/O Rehmat Qayum, Vill: Gamber Swat.	GMS. Baderkani, Dir.	-do-
9-	Dilawar Khan, F.A. S/O Azmo Village, Alligrama Distt: Swat.	GHS. Reshun, Chitral.	-do-
10-	Mohammad Karam, F.A. S/O Ghulam Haider, Village Bara Bandai Swat.	GHS. Brep Chitral.	-do-
11-	Badshah Khan, F.A. S/O Wazir Khan, Village Manyar Swat.	GHS. Warijun, Chitral.	-do-
12-	Saminullah S/O Mulla, Vill: Estoballah Rahmi, Chitral (Swat).	G.S. Parabog (Chitral)	-do-
13-	Masood Ahmad, F.A. S/O Khalilur Rehman, Village Gamber Swat.	GMS. Kushum,	-do-
14-	Hazmatullah, F.A. S/O Hazmatullah, Village Khar Batkhela Mlkd: Agency.	GMS. Hayasari (Dir)	-do-
15-	Mohammad Riaz, F.A. S/O Nik Mohammad, Village D/Julagram Mlkd: Agency.	GMS. Saifat Hrkari, Chitral.	-do-
16-	Akhter Ali, F.A. S/O Amir Hamza, Village Guligram Swat.	GMS. Sore Iospure.	-do- -do-
17-	Bakht Zamin, F.A. S/O Said Nawab, Village Kokari Swat.	GMS. Beyar, Dir.	-do-
18-	Fazli Rafiq, F.A. S/O Mohammed Shafiq, Village D/Julagram.	GMS. Pang, Chitral.	-do-

TERMS & CONDITIONS.

- 1- No T.A./D.A. is allowed.
- 2- Charge reports should be submitted to all concerned.
- 3- No joining time is allowed except transit days.
- 4- The apptt: is purely temporarily and subject to termination at any time without notice and assigning any reason. In case of resignation he shall have to submit one month's prior notice to the Deptt: or forfeit one month's prior notice to the deptt: or forfeit one month's pay in lieu thereof to the Government.

Contd: on page....2.....

(For use in Police Department only).

7 B

Note:

Heirs,

- 1.
- 2.
- 3.

- 1.
- 2.
- 3.

Verification Roll No. _____ dated _____ received back _____

4.

Left thumb-impression. _____

5.

6.

S. No	Name of Exam	Roll No	Marks/Grade	Date	Qualifications	Date
1	Qualification			Date	Qualifications	Date
	S.S.E	39394	331/E	1982	passed 3 rd m. having 700 C & E marks Under R. No 31 securing 498/1000 marks on 1989.	
	English	(P.S) Add: 5892	25/75	1983	First Arts	
	Urdu	(C.A.T) Add: 11588	45/100	1984		
2	Pashtu	15296	475 D	1985	B. L. or B. A.	Sub Divisional Edu: Officer, Saibu Sharif Sub Division.
	Urdu					
	Plan-drawing				Pleadership examination	
	Passed BA Examination from Faisalpur: Urdu College Karachi Urdu Roll No. 20267				Training School Final examination	
	Drill instructing 2nd Division date of death 18/7/98 (1997)				Other qualifications—	
	Court duties			6-7-98/11		
	Reserve duties					
	District Education Officer (II) Secondary SWAT.				Assistant District Officer (II) Elementary & Secondary Education Swat.	

7.

8.

9.

10

N. B.—Line to be drawn under the qualification possessed.

(8)

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 *Mohammad Karam Khan*

2. Race

3. Residence *village & p/o Bara Bandai Teh: Kabal Distt Swat.*

4. Father's name and residence *Ghulam Haider village & p/o Bara Bandai Teh Kabal Distt Swat.*

5. Date of birth by Christian era as nearly as can be ascertained *12-4-1964 (Twelfth April N.H & Sixtyfour)*

6. Exact height by measurement *5' 6" (Five feet six inches)*

7. Personal marks for identification *A black mole over the shoulder*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Stamps

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.

*Assistant District Officer
Elementary & Secondary Education
Swat.*

9. Signature of Government servant. *Karam*

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

Signature
Headmaster
Govt High School
Distt. Ch...

*1/2 Khan
te
300 Marks*

*1/2
Nicer,
2/2*

1	2	3	4	5	6	7	8	9	
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.	P y in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signature designation head of the other att officer in att of columns	
		BPS NO 9 @ Rs. 620-29-1200 (Fixed)							
Mohammad Khan Karam DMaster G.H.S. Brop chital	Temporary	620/-	-	-	-	14.4.87	<i>[Signature]</i>	<i>[Signature]</i>	
DO	DO	620/-	-	-	-	-	<i>[Signature]</i>	<i>[Signature]</i>	
G.H.S. Ziamdarara D/S/D - D/R	DO	620/-	-	-	-	9.6.87 8.4.87	<i>[Signature]</i>	<i>[Signature]</i>	
DO		830-38-1590 (Fixed)						<i>[Signature]</i>	
	DO	830/-	-	-	-	7 1.87	<i>[Signature]</i>	<i>[Signature]</i>	
G.H.S. Ziamdarara D/S/D - D/R	DO	830/-	-	-	-	16.6 89	<i>[Signature]</i>	<i>[Signature]</i>	
DO	DO	830/-	-	-	-	1.12 87	<i>[Signature]</i>	<i>[Signature]</i>	
DO	DO	830/-	-	-	-	1.12 89	<i>[Signature]</i>	<i>[Signature]</i>	

Entries Revised on the

1987 Next page No. 6 p. see

and of all additional amounts
 J.P.P. Foshwar
 and fixed in the Revised Scale for 1987
 of Rs. 830/- FIXED (1-1-87)
 of Rs. 830/- 1-1-87
 of Rs. 830/- 1-1-87

Accounts Officer

[Signature]

(10)

8	9	10	11	12	13		14	15	
	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	Nature and duration of leave taken	Leave		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.
						Allocation of period of leave or average pay upto four months for which leave salary is debitable to another Government	Government to which debitable		
	Govt High School, Distt Chitral	8.6.87	Transfer	Govt High School, Distt Chitral				Appointed against vacant post at Govt High School Bopel Distt; Chitral vide	
	Govt High School, Distt Chitral	8.6.87	Transfer	Govt High School, Distt Chitral				Director of Education School Malakand Division Swat	
	Headmaster, Govt High School, ZAMBARA, Distt Dir	2						Sharif Swat ENo. 8737-71 dated 1.4.1987. He took over charge in this school on 14.4.1987	
	Headmaster, Govt High School, ZAMBARA, Distt Dir		Transfer	Govt High School, ZAMBARA, Distt Dir				Transferred to Govt High School ZAMBARA Swat vide DE(S) ENo 13966-69 dated 8.6.1987. He made over charge on 8.6.1987	
	Head District Officer, Swat		Transfer	Headmaster, Govt High School, ZAMBARA, Distt Dir				Service verified w.e.f. 14.4.1987 to 8.6.1987.	
6 see				Headmaster, Govt High School, ZAMBARA, Distt Dir				Extra ordinary leave granted	

(11)

1	2	3	4	5	6	7	8	9
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	Signature designation head of the other officer in att of columns
D.M. S.H.S. Liandara (D.S.)	Supp per.		Rs 620/- p-fixed			9/6/87	Kalau	Head master Govt. High School Liandara
Do.	Do.		Rs 830/- p-fixed			1/7/87	Kalau	Head master Govt. High School Liandara
Under Training at Govt Elementary College Thana	- Do		without pay			6/9/88	Kalau	Head master Govt. High School Liandara
D.M. S.H.S. Liandara (D.S.)	- Do -		Rs 830/- p-fixed			16/6/89	Kalau	Head master Govt. High School Liandara
D.M. S.M.S. Sarbanda	- Do -		830/-			1/4/90	Kalau	Head master Govt. High School Liandara
- Do -	- Do -		Rs 868/-			1.12.90	Kalau	S.D.E.O. Saidu Sharif
		RPS No 9 = 1185-72-2265					Kalau	S.D.E.O. Saidu Sharif
- Do -	- Do -		Rs 1329/-	4		1/6/91	Kalau	S.D.E.O. Saidu Sharif
- Do -	- Do -		Rs 1401/-	4		1/12/91	Kalau	S.D.E.O. Saidu Sharif
D.M. S.M.S. Mingolai	- Do -		Rs 1401/-			1/7/92	Kalau	S.D.E.O. Saidu Sharif

Chief of the Accountant General
A.W.F.P. Peshawar.
Pay fixed in the Revised Pay Scales 1991
of Rs. 1185-72-2265 (19)
of Rs. 1329/- P.M.W.B.P. 1-6-1991
with next increment on 1-12-1991

Voucher No. 72 dated 15-8-92
Draws difference of pay from Rs. 1185-72-2265 to Rs. 1329/- due to Annual Inc. Rs. 144/- in 11th step of Karam. 04.
TOTAL Rs. 1329/-

Distt. A/c Officer
SWAT

Account Officer
Chief Accountant General
A.W.F.P. Peshawar.

Assistant District Officer
Elementary & Secondary Education
Swat

828/7

(12)

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	10 Date of termination of 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 debitible to another Government		
						Period		
<i>Kalau</i>	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:	30/6/87	pay scale Revised	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:	Due to early completion of D.M. training and taking over charge. The extra ordinary leave was cancelled w.e.f. 10-6-89 to 30-8-89 (78 days) vide D.E(S) Madakand Division Endst No 26113-14/A-12/P/7 dtd 15-8-89.			
<i>Kalau</i>	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:	5/9/88	Joined at D.M. Training at Thana	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:				
<i>Kalau</i>	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:	15/8/89	Completed D.M. Regular Training	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:				
<i>Kalau</i>	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:	31/9/90	Transferred to D.S. Ser Banda	<i>F. Allah</i> Head master, Govt. High School, ZIAMDARA, Distt: Dir:				
<i>Kalau</i>	<i>F. Allah</i> S.D.E.O. Saidu Sharif	30.11.90	Scale	<i>F. Allah</i> S.D.E.O. Saidu Sharif				Service Verified w.e.f. 9/8/87 to 31/3/90
<i>Kalau</i>	<i>F. Allah</i> S.D.E.O. Saidu Sharif	31/5/91	Scale	<i>F. Allah</i> S.D.E.O. Saidu Sharif				
<i>Kalau</i>	<i>F. Allah</i> S.D.S.O. Saidu Sharif	R.P.	Scale	<i>F. Allah</i> S.D.S.O. Saidu Sharif				
<i>Kalau</i>	<i>F. Allah</i> S.D.E.O. Saidu Sharif	30/11/91	Ann. Inc.	<i>F. Allah</i> S.D.E.O. Saidu Sharif				Service verified from 1-4-90 to 31-12-90 from req. Rolls & other records of this office.
<i>Kalau</i>	<i>F. Allah</i> S.D.E.O. Saidu Sharif	30/6/92	Transfer	<i>F. Allah</i> S.D.E.O. Saidu Sharif				Sub Divisional Edu. Officer, Saidu Sharif Sub Division.
<i>Kalau</i>	<i>F. Allah</i> S.D.E.O. Saidu Sharif	30/11/92	Ann. Inc.	<i>F. Allah</i> S.D.E.O. Saidu Sharif				pay fixed in B-9 on point to point basis w.e.f. 1.6.91 as under: pay in BPS 409 = Rs. 868/- pay fixed in Modified = Rs. 890/- pay fixed in BPS = Rs. 1329/-
		31-12-92						Sub Divisional Edu. Officer (M) Saidu Sharif sub Division.

(13)

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	Signature designa head of t other officer in of colon
D.T.		BPS No 9	(1185-72-2265)					
C.M.S. Nungolai	Sub Per		Rs. 1473/-			12/1/92	Kalan	
do	do		Rs. 1473/-			7/1/93	Kalan	Dy. I (Sec)
do	do	Revised Entries on d/c a/c	Rs. 1401/-	A		1/8/91	Kalan	Dy. D (Sec)
do	do	1329/13/1473	Rs. 1473/-	A		12/1/91	Kalan	Dy. D (Sec)
do	do	1473/15/1545	Rs. 1545/-	A		12/1/92	Kalan	Dy. D (Sec)
do	do	1545/16/1617	Rs. 1617/-	A		12/1/93	Kalan	Dy. D (Sec)
do	do	Revised pay fixation in BPS No 9	1617/-			12/1/93	Kalan	Dy. I (Sec)
do	do							
do	do							
do	do							
do	do							
do	do							
D.T.	Sub Per	BPS-9(94)	2090/-			1-6-94	Kalan	Dy. D (Sec)

Service from 1-2-93 to 31-12-94 in the post of Dy. Secy. & other posts of this Office.

[Signature]
Dy. Secy. (Secy.)

Chief Accounts Officer
EWAF

Assistant District Officer
Elementary & Secondary Education
Swat.

[Signature]

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8 Nature of Government servant	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of 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 debitabale to another Government		
					Period	Government to which debitabale		
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	30/93	Employed Secondary	<i>[Signature]</i> D. D. E. O. SAIDU SHARIF			Service Verified w.e.f. 11/11/93 to 30/6/93 from app. Roll's & other records of this office.	
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	31/91	Entry Received 22.7.91	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.			Sub Divisional Edw. Officer, Saibu Sharif, Sub Division,	
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	30/91	Annual Increment	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.			Pay fixation in BPS No. 9 on 1/8/91 under vide Finance Dept. No. 11, Government No. FD (PRC) 1-1-91 dated 20-6-93 to remove the anomaly.	
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	30/92	Annual Increment	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.			Pay fixation on 1/8/91 in BPS No. 9 = 868/-	
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	31/93	Annual Increment	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.			Pay fixation on 1/8/91 in BPS No. 9 = 1401/-	
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	31/94	Fixation provided for removing anomaly of pay w.e.f. 1-6-91	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.			Pay fixation on 1/8/91 = 1473/- 1/12/92 = 1545/- 1/12/1993 = 1617/-	
	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.	31/94	Pay w Scale revised	<i>[Signature]</i> Dy. D.E.O. (M) (Secy) Swat.			Dy. Dist: Education Officer (M) (Secondary, SWAT, Taken No. 9037 3-1-94 1-6-91 one recommended on anomaly TOTAL Rs 2232/-	
<p>UNDERTAKING. I Mr. <i>[Name]</i> <i>[Signature]</i> working against <i>[Post]</i> Post at CMS <i>[Name]</i> do hereby give an undertaking to the effect that if any over Payment is made to me as a result of in correct Fixation of my Pay w.e.f. 1-6-94. It will be made good by recovery from my Pay/Pension/Gratuity</p> <p>Attested <i>[Signature]</i> Sign: of Govt. Servant.</p> <p><i>[Signature]</i> Dy. Dist: Education Officer (M) Secondary, SWAT.</p>					<p>Departmental pay fixation in Revised pay scale No. 7 @ Rs. 1605-21-3060 w.e.f. 1.6.1994 vide Finance Dept's Notification No FD (PRC) 1-1194 Dated Pesh. the 26-5-94 Existing Basic Pay on 31-5-94: 1617 Increase @ Rs 35.0/o on Basic Pay: 565.25 Total: 2182.25 Equal/Next Stage in Revised Pay Scale: 2187/- Pay fixed on 1-6-94: 2187/-</p>			

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1	2	3	4	5	6	7	8	9
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	Signature designation head of the other at officer in a of column
D.M.		B.B.P.S No R (1605-97-3060)						
GMS.	Sub/pm		Rs. 2284/- P.M.			12/94	Kala	D.Y. Secy
Majrohi		21871	Rs. 2381/- P.M.			12/95	Kala	D.Y. Secy
do	do	2381	Rs. 2478/- P.M.			12/96	Kala	D.Y. Secy
do	do		Rs. 2478/- P.M.			12/97	Kala	D.Y. Secy
B.P.S No 14 (2065-161-4430)								
do	do		Rs. 2548/- P.M.			12/98	Kala	D.Y. Secy
do	do	CP 7/98	Rs. 2709/- P.M.			12/98	Kala	D.Y. Secy

Detail of op/payment

6/91 to 11/97	Rs. 6763-00
12/97 to 6/98 pay 71.	Rs. 727-00
Total op	Rs. 7490-00
6/91 to 18/95 Exempt	Rs. 6132-00
Balance of P	Rs. 3358-00

CP. 10/21
 Drawn out of B-14
 up to 15/98 to 30/98
 amounting to Rs. 2281/-
 2548-2281 = 267/-

The above of payment worth
 Rs. 3358/- started @ Rs. 300/- P.M.
 Through computerised pay roll
 in 10/99 vide P.O. No. dated

District Education Officer
 Secondary Swat.

Assistant District Officer
 Elementary & Secondary Education
 Swat.

11

8	9	10	11	12	13		14	15
					Period	Government to which debitible		
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	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government	Signature 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.
	DY. D.E.O (M) Secy. Swat	30/11/95	Ann: Jmc	Dy. D.E.O (M) Secy Swat			Service Verified w.e.f. 1-1-95 to 31-12-95 Dy. Dist. Education Officer (M) Secondary Swat at Gulkada	
	Dy. D.E.O (M) Secy Swat	30/11/96	Ann: Jmc	Dy. D.E.O (M) Secy Swat			Service Verified w.e.f. 1-1-96 to 30-11-96 from acq: Roll and other Record of this office.	
	Dy. D.E.O (M) Secy Swat	30/11/97	Ann: Jmc	Dy. D.E.O (M) Secy Swat			Dy. Dist. Education Officer (M) Secondary Swat at Gulkada.	
	Dy. D.E.O (M) Secy Swat	11/5/97	Ann: Jmc graded pay scale B-14	Dy. D.E.O (M) Secy Swat			Service Verified w.e.f. 1-1-96 to 30-11-97 from acq: Roll and other Record of this office. Dy. Dist. Education Officer (M) Secondary Swat at Gulkada.	
	Dy. D.E.O (M) Secy Swat	30/11/98	Ann: Jmc	Dy. D.E.O (M) Secy Swat			Service Verified w.e.f. 1-12-97 to 30-11-98 from acq: Roll and other Record of this office.	
	Dy. D.E.O (M) Secy Swat	30/11/99	Ann: Jmc	Dy. D.E.O (M) Secy Swat			Dy. Dist. Education Officer (M) Secondary Swat at Gulkada.	
14	Ac. (199) Pay Fixation Party N.W.F.P. Peshawar.	16/25-97-3060 B-9	Ann: Jmc	Dy. D.E.O (M) Secy Swat			No. 116/91 to 11/97 R) 6/63/ may be resumed.	
	cf.						Sanction is accorded to the grant of graded pay scale B-14 w.e.f. 15.5.98 vide ODE(S) M.R.D. Division of Swat Dist. Exdt. No. 1753-56 Dated 8-3-98	

17

1	2	3	4	5	6	7	8	9
Name of post	Whether substative or officiating and whether permanent or temporary	if officiating state (i) substative appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substative post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant	Signature designati head of th other a officer in a of column
D. M GMS. Ningsala	Sub/Per		Rs. 2870/-			1 ¹² / ₉₉	Karu	D.D.E. Secy: S
- Do -	"		Rs. 3031/-			1 ¹² / ₂₀₀₀	Karu	D.D.E. Secy: Sw
505260/- No need		Office of the Accountant General N.W.F.P. ex. way. Pay Fixed in the revised basic pay scales 2001 of Rs at Rs: 5260/- PMVEE with next increment on 1-12-07-12-2008			15-8-2006 1-12-2001		Assistant District Officer (C) Education & Security, District Swat.	Serv to/ other
D.M.	(BPS No. 14 CR. 3565-275-11815)							
GHS Chail	- do -		Rs. 5490/- P.M.			15 ⁸ / ₂₀₀₆	Karu	Govt. Chail
- do -	- do -		Rs. 5490/- P.M.			1 ¹² / ₀₆	Karu	Govt. Chail
<p>Sanction is accorded for the period from 15.8.06 to 31.01.07 for the purpose of pay vide D.O. Swat order No. 2835 dated 15.3.07 and BDO SIL Swat order No. 4422-24 dated 17.3.2007.</p>				<p>Adjustment of pay = T 318 26/3/07 Drawn regul. pay rollers whf 1/8/06 to 31/1/07 amount of Rs. 845988 Rs. 4228</p>				

PRINCIPAL,
Govt. High School,
Chail, Distt. Swat.

183

8	9	10	11	12	13	14	15	
				Leave				
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	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government	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.
				Period		Government to which debitale		
	D.D.E.O. (M) Secy. Swat	30/11/2000	A) Inc proceeding on long leave	D.D.E.O. (M) Secy. Swat				Service Verified w.e.f. 1-12-98 to 30-11-2000 from acq. Roll and other Record of this office.
	D.D.E.O. (M) Secy. Swat	14/8/2001		D.D.E.O. (M) Secy. Edu Swat				Extra ordinary leave without pay for the period from 15-08-2001 to 14-08-2006 Sanction (1825 days) vide EDO Govt Endst. No. 1592-94 dated 13-08-2001.
								Service Verified w.e.f. 1.12.2000 to 14.8.01. From acq. Roll and other Record of this office.
								District Officer (M.A.B.) Schools & Literacy Swat
								Assistant District Officer (I) Elementary & Secondary Education Swat
								Distt. Officer (S/Edu) (Admin. & Dev.) Distt. Swat.
								<u>PAY FIXATION</u>
								pay on 14.8.2001 Rs. 3031/- Allowed A/Rex on 12/01 Rs. 3192/- pay fixed on 12/01 RPS 14 Rs. 4780/- pay fixed on 15/08 in B-14-Rs. 5490/-
								Principal Govt. High School Chail Swat.
								Principal Govt. High School Chail Swat.
								After expiry of Extraordinary leave without pay wef 15.8.01 to 14.8.06, the official is adjusted at GHS Chail Swat wef 15.8.2006 vide EDO S/L Swat endstr

Access

30/11/06 A/Rex not allowed

Adjusted
531
28/3/07
DR. [unclear]
M. 10/2/87

(19)

مذمت جا۔ ایڈیشنو ڈسٹریکٹ انیسٹریکشن سوات۔
عنوان: چھٹی نمبر تنخواہ از بیم سارج (2007 تا 2008) میں 2012

(C)

یا Half pay مدت ایک سال

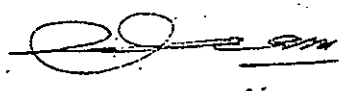
جناب عالی

مذمت میں ہے کہ میں گیسٹ DM تو دعتت عالی سکول میں
میں کا آکر رہا ہوں۔ جو تادمہ زحم بالا پر بیٹھے اس قدر
آراہ صاحبان جوانی کے مذکورہ بالا
پر بیٹھے چھٹی عینیت خرماد میں تو بڑی معیوبی
ہوئی

الفارص

صدر مہمان DM
تو دعتت عالی سکول میں

Forwarded to EDO (S-4)
Swat/2012 pl.

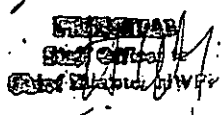


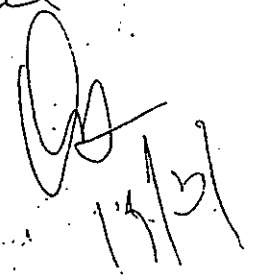
PRINCIPAL,
Govt. High School,
Chail, Distt: Swat.

1191
22/8/07

EDO (B), Swat

pl. Signature done
as done by




11/2/12

20

D

OFFICE OF THE DISTRICT OFFICER, ...

Office of the ...

Sanction is hereby granted to the grant of leave ...

Necessary entry to this effect should be made in his ...

The official leaving to ... the same ... where he proceeding on long leave.

(S. JUDAN AKBER)
EXECUTIVE DISTRICT OFFICER, ...
STATE OF GUJARAT.

Encl: No. 3105 / P. File. P. R. Khan / R. L. Dated 28/10/19...

Copy to the:

- 1. Principal ...
- 2. Official concerned.
- 3. The ...

Handwritten signature and stamp area.

BETTER COPY PAGE NO. 20

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (DEO, EDO.

Application of Leave:

Sanction is hereby accreted to the grant of leave with out pay w.e.f from 01-06-2007 to 30-04-2010 in respect of Mr. Muhammad Karam Khan, D.M, Govt. High School Chil, as per the leave rules 1981.

Necessary Entry to this effect should be made in his service book accordingly.

The official likely concern to the same station from where he proceeding on long leave.

----S/D---

(GHULAM AKBAR)

Executive District Officer (S&D)
Swat At Gulkada

Endost. No: 3205/Profile: M.K.Khan/DM

Copy to that:

1. Principal, Govt. High School, Chail
2. Official Concerned.
3. P.A local office.

----S/D---

(GHULAM AKBAR)

Executive District Officer (S&D)
Swat At Gulkada

I Mr. Muhammad Karam Khan DM returned from Long Jeeves, & attended a meeting on night Saturday i.e. 17-08-2017 at Chail

Muhammad Karam Khan DM

R/S/17

The page of DM is already occupied by the signature of Mr. Javed Hussain DM on 17-08-2017. Please refer to the report of Subordinate for the period.

J. S. [Signature]
For

حکومت جناب - چیئر پرسنل کے ایجوکیشنل افسیر (مردانہ) ضلع سوات
عوام: درخواست برائے ایڈجسٹمنٹ نامہ اسماء اللہ از کراچی 2012-13
2017

جناب عالی!

مورد نام گزارسی ہے۔ کم میں کچھ ڈیٹا ٹینٹ مائیکرو ڈیٹا کے بارے میں سکول میں
سے لائٹ لیوٹے کیا تھا۔ چونکہ میں مزید مذکورہ ایڈجسٹمنٹ کی درخواست کی۔ کیونکہ
سوات میں کئی بار صورت حال کیوجہ سے تھری لے گیا اور یہاں تک کہ
موت سے کھیلنا تھا۔ اب حالات ٹھیک ہو گئے ہیں۔

آرا - صاحبان کو بانی مذکورہ کے بارے میں کیا معلوم ہے
کیا کبھی اور کسی بھی طرح ایڈجسٹمنٹ کے اکاؤنٹات عہدہ داروں
کو عینی نواز میں ہوئی۔

الغرض
محمد کریم خان DM
گورنمنٹ ہائی سکول جی (مردانہ)

محمد کریم خان
2018
عوام 2017

(F) گفتو، جناب ڈائریکٹر ایجنسی ایئر سٹریٹجی اور ایجوکیشن کیشہ

(23)

موضوع: اپیل برائے ایئر کھسٹنٹ (Adjustment) بطور
D.M گورنمنٹ ڈپٹی سیکرٹری جیل سروس نواب

بنا علی

گزارش کے مسائل اور درج ذیل امور کے لیے بطور D.M

صفحہ نمبر 1 سے شروع ہوا ہے اور یہ تقریباً 1/4/1987 کو
اپنے تعلق سے سوائف کے مسائل کو گورنمنٹ کے پاس
اپنے حیران کنہ سے بھی لکھ کر مسائل کے حق و قصور پر لکھا۔
اسی طرح سٹیٹ نے سال 2017 میں اپنی Annual جمع کی صورت
میں کوئی بھی نہ جہد آئی ہے۔ Adjust کر کے لکھا
سکتے ہیں اس کو بھی یہ بھی اور کھسٹنٹ میں لکھا ہے جو
مستحقانہ ہے۔ بدین معنی کھسٹنٹ کے مسائل کے بارے میں
کوئی نہ ہے اور میں یہاں پر اثرات اور اثرات کے

کھسٹنٹ کے لیے یہ خط لکھ کر اس میں اپنے مسائل کے
میں کھسٹنٹ میں بھی D.M کی صورت پر اور کھسٹنٹ
(Adjustment) کے افکار کا ذکر کیا ہے۔

تاریخ: 15/9/2023

۱۰ ۱۱ ۱۲

(24) (9)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 58/14 /F.No.366/Appeal/M/Dir Lower/Estab-1
Dated Peshawar the 15-9-2023.

To

The District Education Officer
(Male) Swat.

Subject: - APPEAL FOR ADJUSTMENT

Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of an appeal lodged by Muhammad Karam Ex-DM GHS Chall District Swat and to ask you to submit detail report to proceed further into the matter, please.

(Signature) 15/9/2023
Assistant Director (Estab-1)
Directorate of Elementary & Secondary Edu
Khyber Pakhtunkhwa, Peshawar.

Endst; No. _____

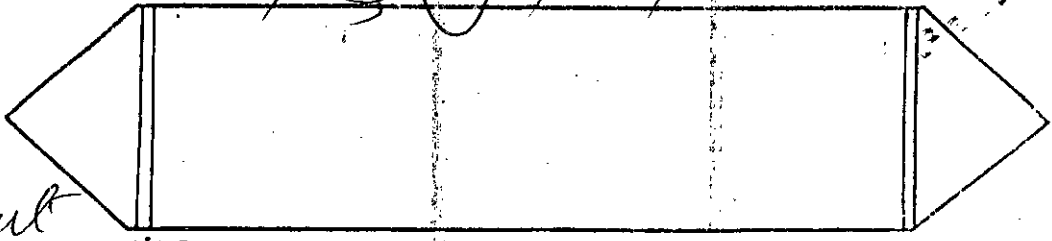
Copy forwarded to the: -.

1. P.A to Director Elementary and Secondary Education local office.

Assistant Director (Estab-1)
Directorate of Elementary & Secondary Edu
Khyber Pakhtunkhwa, Peshawar.

ایڈیٹریلٹ سروس ٹریڈ یونین انجمن

AMALY
Law



Appellant

2 مخانب
ایم ایم 06 بنام حکومت

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنک

Handwritten signature/initials on the left side of the text block.

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے لئے کیلئے کاروائی کی درخواست کیلئے کاروائی کی درخواست
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر حالت ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
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 بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ کہہ دیا کہ سند ہے۔

المقوم 2024

واہ العی

Accepted & Attested

Handwritten signature and name 'Waseed'.

Handwritten signature and name 'M. K. Khan'.