

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7597/2021

BEFORE: MRS. RASHIDA BANO ... MEMBER(J)
MR. MUHAMMAD AKBAR KHAN ... MEMBER (E)

Abdul Musawair S/O Muhammad Ali, SPST, BPS-14, GPS Anar Kali,
Charsadda, R/O Amir Abad, P.O Rajjar, Tehsil & District Charsadda.
.... (Appellant)

VERSUS

1. The Director Elementary & Secondary Education Department, Peshawar.
2. The District Education Officer (M), Charsadda.
3. The Accountant General, Khyber Pakhtunkhwa, Peshawar Cant.
.... (Respondents)

Mr. Muhammad Maaz Madani
Advocate ... For appellant

Mr. Muhammad Jan
District Attorney ... For respondents

Date of Institution.....15.10.2021
Date of Hearing.....06.11.2023
Date of Decision.....06.11.2023

JUDGMENT

RASHIDA BANO, MEMBER (J): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

“On acceptance of this appeal, the inaction of the respondents by not allowing the annual increment for the year 2014 and releasing outstanding salaries for the month of June, July & August 2014 may very kindly be declared illegal and the respondents may kindly be directed and also release the outstanding salaries for the months of June, July & August 2014.”

2. Brief facts of the case, as given in the memorandum of appeal, are that appellant was initially appointed as Primary School Teacher (BPS-12) on adhoc basis vide order dated 31.05.2014. Later on services of the appellant was regularized in the year 2017 from the date of his appointment. He was promoted

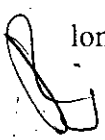
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KPBT
Peshawar

to the post of Senior Primary School Teacher (BPS-14) vide order dated 12.03.2018. The appellant facing huge discrepancy in the monthly salary due the reason that increment for the year 2014 was not allowed and the salaries for the month of June, July and August 2014 was not released. Despite the factum of pay fixation party of respondent No.3 allowed the increment for the year 2014 but till date the same is neither been included nor been allowed in the salary of the appellant. Feeling aggrieved, he filed departmental appeal, which was rejected, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that appellant has not been treated in accordance with law and rules and respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973. He further argued that the act and omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing salaries is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of law is liable to be struck down. He submitted that appellant has properly submitted his charge report and mark his attendance in the attendance register on 31.05.2014 and he is held entitled for annual increment for the year 2014.


5. Learned District Attorney contended that the appellant has been treated in accordance with law and rules. He further contended that initially the appellant was appointed on 31.05.2014, but the appointment order of the appellant and his colleagues were amended and in this regard a corrigendum was issued. The amended order directed the appointees to take charge from 01.09.2014, because of long summer vacations to save the public exchequer.



6. Perusal of record reveals that appellant was appointed as Primary School Teacher vide appointment order dated 31.05.2014 and it is admitted fact that appellant submitted his arrival report on the same day i.e 31.05.2014. He was regularized from the date of his appointment vide notification dated 15.03.2018. According to the terms and conditions as mentioned in the appointment order of the appellant, he could draw his pay with effect from 01.09.2014, however in view of section 17 of Civil Servants Act, 1973 and FR17 the appellant is entitled for the payment of his salaries with effect from 31.05.2014, the date on which he submitted his arrival report. The appellant is thus entitled to receive salary for the months of June, July and August 2014. Moreover, while counting their service from 31.05.2014, six months service period as required for grant of annual increment stood completed and the appellant is also held entitled for the annual increment of 2014. So far as the question of limitation is concerned, suffice it is stated that being a financial matter, the appellant is having a continual cause of action, therefore, limitation will not have any adverse implication on the claim of the appellant.

7. For what has been discussed above, the appeal in hand is allowed as prayed for and the appellant is held entitled to all back benefits. Costs shall follow the events. Consign.

8. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 6th day of November, 2023.*


(MUHAMMAD AKBAR KHAN)
Member (E)

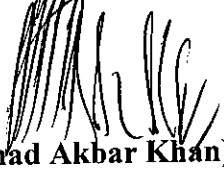

(RASHIDA BANO)
Member (J)


ORDER
06.11.2023

1. Learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney for the respondents present.

2. Vide our detailed judgement of today placed on file, the appeal in hand is allowed as prayed for and the appellant is held entitled to all back benefits. Costs shall follow the event. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 6th day of November, 2023.*


(Muhammad Akbar Khan)
Member (E)



(Rashida Bano)
Member (J)

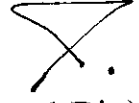
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18.05.2023

Junior of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 10.08.2023 before D.B. Parcha Peshi given to the parties.



(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)

kamranullah

10th August, 2023 01. Junior to counsel for the appellant and Mr. Fazal Shah Mohmand, Addl. AG for the respondents present.

02. Former requested for adjournment due to engagement of learned senior counsel for the appellant before the Hon'ble Peshawar High Court, Peshawar. Granted. To up for arguments on 06.11.2023 before the D.B. Parcha Peshi given to the parties.


(FAREEHA PAUL)
Member(E)


(RASHIDA BANO)
Member (J)

zle Subhan. P.S*

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Peshawar

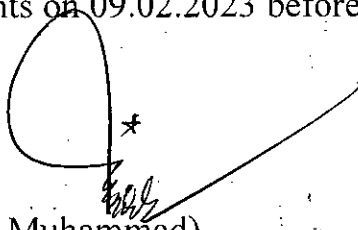
06.12.2022

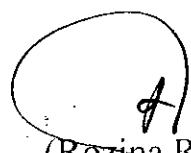
Appellant present in person.

Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Former requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 09.02.2023 before D.B.

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Peshawar


(Mian Muhammad)
Member (E)



(Rozina Rehman)
Member (J)

09.02.2023

Counsel for the appellant present. Mr. Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Mrs. Rozina Rehman, Learned Member (Judicial) is on leave today, therefore, case is adjourned to 18.05.2023 for arguments before D.B.

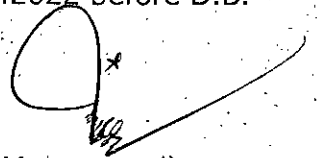
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(Fareeha Paul)
Member (E)

24.05.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Wisal ADEO for the respondents present.

Representative of the respondents submitted written reply/comments which is placed on file. Copy of the same is handed over to junior counsel for the appellant. To come up for rejoinder if any, and arguments on 04.08.2022 before D.B.



(Mian Muhammad)
Member (E)

4-8-2022

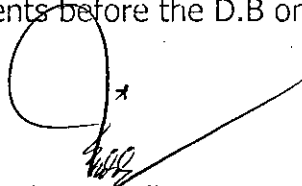
Proper DB not available the case is
adjourned to 10-10-2022


Reader

10.10.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 06.12.2022.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

20.12.2021

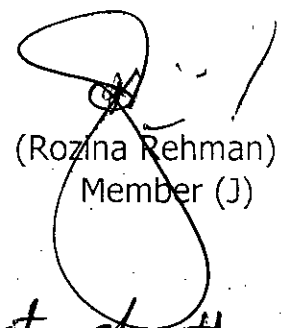
Appellant present through counsel.

Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To

Appellant Deposited
Security & Process Fee

come up for written reply/comments on
24/12/21 07/03/2022 before S.B.



(Rozina Rehman)
Member (J)

7-3-2022

Due to retirement of the Honble
Chairman the case is adjourned to
come up for the same as before
on 24-5-2022

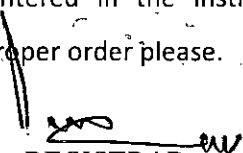


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Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7597 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/10/2021	<p>The appeal of Mr. Abdul Musawir presented today by Mr. Muhammad Maaz Madni Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>20/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>[Faint handwritten notes in Urdu are visible in the left margin of this section.]</i></p>

HYDERABAD PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: ABDUL MUSAWIR v/s EDUCATION DEPARTMENT

CONTENTS		YES	NO
	This Appeal has been presented by: Muhammad Maaz Madni	<input checked="" type="checkbox"/>	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	<input checked="" type="checkbox"/>	
3	Whether appeal is within time?	<input checked="" type="checkbox"/>	
4	Whether the enactment under which the appeal is filed mentioned?	<input checked="" type="checkbox"/>	
5	Whether the enactment under which the appeal is filed is correct?	<input checked="" type="checkbox"/>	
6	Whether affidavit is appended?	<input checked="" type="checkbox"/>	
7	Whether affidavit is duly attested by competent Oath Commissioner?	<input checked="" type="checkbox"/>	
8	Whether appeal/annexures are properly paged?	<input checked="" type="checkbox"/>	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
10	Whether annexures are legible?	<input checked="" type="checkbox"/>	
11	Whether annexures are attested?	<input checked="" type="checkbox"/>	
12	Whether copies of annexures are readable/clear?	<input checked="" type="checkbox"/>	
13	Whether copy of appeal is delivered to AG/DAG?	<input checked="" type="checkbox"/>	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	<input checked="" type="checkbox"/>	
15	Whether numbers of referred cases given are correct?	<input checked="" type="checkbox"/>	
16	Whether appeal contains cutting/overwriting?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
17	Whether list of books has been provided at the end of the appeal?	<input checked="" type="checkbox"/>	
18	Whether case relate to this court?	<input checked="" type="checkbox"/>	
19	Whether requisite number of spare copies attached?	<input checked="" type="checkbox"/>	
20	Whether complete spare copy is filed in separate file cover?	<input checked="" type="checkbox"/>	
21	Whether addresses of parties given are complete?	<input checked="" type="checkbox"/>	
22	Whether index filed?	<input checked="" type="checkbox"/>	
23	Whether index is correct?	<input checked="" type="checkbox"/>	
24	Whether Security and Process Fee deposited? On	<input checked="" type="checkbox"/>	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	<input checked="" type="checkbox"/>	
26	Whether copies of comments/reply/rejoinder submitted? On	<input checked="" type="checkbox"/>	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On	<input checked="" type="checkbox"/>	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Muhammad Maaz Madni

Signature: _____

Dated: 15-10-2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 7597 /2021

ABDUL MUSAWIR

V/S

EDUCATION DEPTT:

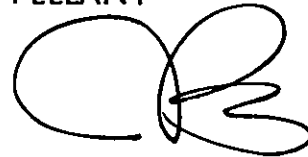
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Peshawar

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APPELLANT

Through:



MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
KHATTAK LAW ASSOCIATES,
Juma Khan Plaza, Warsak Raod, Peshawar
0333-9313113, 0345-9090737
muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 7597 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7742

Dated 15/10/2021

ABDUL MUSAWIR s/o Muhammad Ali, SPST (BPS-14),
Govt. Primary School, Angar Kali, Charsadda.
r/o Amir Abad, PO Rajjar, Tehsil & District Charsadda.

.....APPELLANT

VERSUS

- 1- THE DIRECTOR EDUCATION, Khyber Pakhtunkhwa,
near Govt. Hasnain Shaheed High School, Firdous, Peshawar.
- 2- THE DISTRICT EDUCATION OFFICER,
District Charsadda.
- 3- THE ACCOUNTANT GENERAL, KHYBER PAKHTUNKHWA,
Fort Road, Peshawar Cantt.

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE INACTION OF THE RESPONDENTS BY NOT
ALLOWING INCREMENT FOR THE YEAR 2014 & ALSO NO
RELEASING OUTSTANDING SALARIES FOR THE MONTH
OF THE JUNE, JULY & AUGUST 2014 AND AGAINST
APPELLATE ORDER DATED 16-09-2021 (Communicated to the
appellant through register post on 21-09-2021) WHEREBY THE
DEPARTMENTAL APPEAL DATED 09-07-2021 OF THE
APPELLANT WAS REGRETTEED ON NO GOOD GROUNDS

PRAYER:

That on acceptance of the instant service appeal the inaction
of the respondents by not allowing the annual increment for
the year 2014 and not releasing outstanding salaries for the
month of June, July & August 2014 may very kindly be
declared illegal and the respondents may kindly be directed
to allowing increment for the year 2014 with all back benefits
and also release the outstanding salaries for the month of
June, July & August 2014. Any other remedy which this
august Tribunal deems appropriate that may also be awarded
in favor of the appellant.

Respectfully Sheweth;

FACTS:

Brief facts giving raise to the instant appeal are as under:

Filed to-day
Registrar
15/10/2021

1. That appellant is the employee of the respondent Department and was initially appointed as Primary School Teacher (PST) (BPS-12) on adhoc basis after fulfilling all the legal and codal formalities required for the post vide order dated 31-05-2014.

Copy of Appointment Order dated 31.05.2014 is attached as Annexure A.

2. That the appellant after receiving the appointment order dated 31-05-2014 submitted his arrival report and took over the charge of the post assigned in the appointment order on 31-05-2014 and made entry in the attendance register of the school since then the appellant is working quite efficiently, whole heartedly with full devotion and upto the entire satisfaction of his high ups.

Copy of Charge Report dated 31.05.2014 & Attendance Register is attached as Annexure B & C.

3. That service book of the appellant was also prepared and necessary entry was made therein in the service book from the date of initial appointment till date.

Copy of Service Book are attached as Annexure..... D.

4. That service of all the adhoc teachers were regularized vide Regularization Act of 2017 and accordingly the services of the appellant was also regularized from the date of appointment vide order dated 12-03-2018, the entry of which was properly incorporated on page-7 of the service book already annexed above as annexure-D.

5. That presently the appellant is working as Senior Primary School Teacher (BPS-14) as in the year 2020 the appellant is promoted from the post of Primary School Teacher (BPS-12) to the post of Senior Primary School Teacher (BPS-14) vide order dated 19-05-2020 at serial no. 20, the entry of which has also been made in the service book on page-09 of the service book attached at annexure-D.

6. That appellant was facing huge discrepancy in the monthly salary due the reason that increment for the year 2014 was not allowed and the salaries for the month of June, July & August 2014 was not released for which the appellant made several request before the respondents by knocking the doors of various forum and accordingly the fixation party of

Respondent no. 3 allowed the increment for the year 2014 but till date the same is neither been included nor been allowed in the salary of the appellant.

Copy of Pay Rolls are attached as Annexure E.

7. That the appellant feeling aggrieved from the inaction of the respondents by not allowing increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014, the appellant file Departmental Appeal dated 09-07-2021 before the competent authority which was rejected vide appellate order dated 16-09-2021 on no good ground and the same is communicated to the appellant through registered post on 21-09-2021.

Copy of Departmental Appeal dated 09.07.2021 & Appellate Order Dated 16.09.2021 is attached as Annexure F & G.

8. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others:

GROUND:

- A- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of Law and is liable to be struck down.
- B- That appellant has not been treated by the respondent Department 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 appellant has properly submitted his charge report & made attendance in the attendance register of the school on 31-05-2014 and as such the appellant has spent 180 days on 01st December that entitles the appellant for the annual increment of the year 2014.
- D- That act of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly

salary for the month of June, July & August 2014 is against the prevailing Law & Rules.

- E- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which:
"the state is bound to eliminate disparity in the income and earning of individuals including persons in the various service of Pakistan."
thus in light of the above the respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July & August 2014.
- F- That, the respondents acted in arbitrary and malafide manner while illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014.
- G- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is nothing but depriving the appellant from legal right of livelihood.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 15-10-2021

APPELLANT


ABDUL MUSAWIR

Through:


MUHAMMAD MAAZ MADNI
Advocate High Court, Peshawar


CERTIFICATE

No, such like appeal has been filed or pending on the subject matter between the parties before this Honourable Tribunal.


ADVOCATE

AFFIDAVIT

I, Mr. ABDUL MUSAWIR s/o Muhammad Ali, do hereby solemnly affirm on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.


DEPONENT
17101-3401857-5

ATTESTED



NOTE:

Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.


ADVOCATE

LIST OF BOOKS:

1. Constitution of Pakistan, 1973.
2. Service Laws
3. Other relevant case Laws



6

ANNEXURE-A

Appointment Order PST (M) Ad hoc -Based

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) CHARSAJDA

APPOINTMENT

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST School based/UC based in BPS-12 (Rs: 7000-500-22000) @Rs: 7000/= fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge :-

S.#	Name	School Name	U/C	Score
110/144	ABDUL MUSAWIR 17101-3401857-5	GPS Angar Kor	Rajjar-1	132.1

TERMS & CONDITIONS.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract 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 the certificate/documents must be verified from the concerned authorities by the DEO(concerned) 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 drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join their post within 10 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. Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.

ATTESTED

to be true copy

Adv. [Signature]

7

Appointment Order PST (M) Ad hoc -Based

2


13. His appointment is made on School based; He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

(Siraj Muhammad)
District Education Officer
(Male) Charsadda

Endst: No. 4807-498 /Dated: Charsadda the. 21/5/2014

Copy forwarded for information and necessary action to the:-

1. Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Charsadda
3. District Accounts Officer Charsadda
4. SDEO (M) Charsadda
5. SDEO (M) Tangi
6. Official Concerned
7. M/File


21/5/14.
District Education Officer
(Male) Charsadda

ATTESTED

to be true copy
ATTESTED

8

ANNEXURE - B

CHARGE REPORT CERTIFICATE

Certified that with reference to Office Order No.

4807-4958 (copy enclosed) Dated: 31.05.2014. I have in

the forenoon / afternoon of 31-05-2014 taken over the charge

of the post of Primary School Teacher (PST) BPS-12 at GPS Angar Korona Rajjar,

Charsadda.

Signature of Handing-Over Officer: _____

Name: Farooq Jan

Designation: PSHT ~~Head Mastser~~
~~GPS Angar Korona~~
~~Rajjar Charsadda~~

Signature of Taking Over Officer: _____

Abdul Musawir
Primary School Teacher (PST)

ATTESTED

to be true copy
Advocate

9

رجسٹر حاضری مدرسہ

Annex

2014

بابت ماہ مئی

احمد علی

عبدالمصطفیٰ

نام طالبان

تاریخ	عہدہ			نام طالبان			بابت ماہ مئی			احمد علی		
	آمد	دستخط	روایتی	آمد	دستخط	روایتی	آمد	دستخط	روایتی	آمد	دستخط	روایتی
1	P			P			P			P		
2	P			P			P			P		
3	P			P			P			P		
4	P			P			P			P		
5	P			P			P			P		
6	P			P			P			P		
7	P			P			P			P		
8	P			P			P			P		
9	P			P			P			P		
10	P			P			P			P		
11	P			P			P			P		
12	P			P			P			P		
13	P			P			P			P		
14	P			P			P			P		
15	P			P			P			P		
16	P			P			P			P		
17	P			P			P			P		
18	P			P			P			P		
19	P			P			P			P		
20	P			P			P			P		
21	P			P			P			P		
22	P			P			P			P		
23	P			P			P			P		
24	P			P			P			P		
25	P			P			P			P		
26	P			P			P			P		
27	P			P			P			P		
28	P			P			P			P		
29	P			P			P			P		
30	P			P			P			P		
31	P			P			P			P		

Monitoring
 MA
 9
 7/5/14

See

18/5/14

Arso (m)
 utmerjan

12/35 A=11/50 A=12/35 A=11/20

قسم خدمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
آفاقہ									
آحقانی									
بیجاکی									
میزان کن									

دستخط سربراہ / ناظم

ATTESTED

 to be true copy
 Advocate

10

(For use in Police Department only)

Hairs,

ANNEXURE - D

1. _____
2. _____
3. _____

Verification Roll No: _____ dated _____ received back _____

Left Thumb Impression

Passed S.S.C Examination Qualification: From B.I.S.E Peshawar under R/No 56683 Date: in 2003 (Annual) and marks obtained English 567/850 Placed in Grade B	Passed Hujzul Quran from Wajay-ul-Madrasa Multan in Date: 2009 and marks obtained 90/100
Passed H.S.C Examination from B.I.S.E Pushto Peshawar under R/No 48830 in 2005 and marks obtained 616/1100 Placed in Grade - C The result was declared on 11/8/2005	Tajweed from Jamia Qasimatul Islamia in 2010
Passed B.A from university of Peshawar under R/No 9425 in 2007 in 2nd Division The result was declared on 30/4/2008	B.L. Or B.A Pledership examination 8-2005
Passed M.Sc Examination from university of Peshawar under R/No 6087 in Finger Print 2010 and marks obtained 861/1200 placed in Grad(A), 1st Division The result was declared on 8-3-2011	Training School Final examination 279/550
Drill Instructing Passed NTC Examination from A.I.O. Islamabad under R/No AC 617982 Court Duties in 2009 (autumn) and marks obtained 628/900 Placed in Grade (A) The result was declared on 17/9/2010	Other qualifications
Passed B.Ed Examination from Reserve Duties ANKU mardan under R/No 998 in Spring 2012 and marks obtained 850/1200 The result was declared on 10-9-2012	M.A.S. S.D.E.O (M) CHD
Passed M-Phil Exam to from FUVAST Islamabad under R/No 0008629 in 4/2013 and obtained 70.71 marks The result was declared on 18-3-2013 N.B Line to be drawn under the qualification possessed.	M.A.S. S.D.E.O (M) CHD

Male Charsadda

S.D.E.O

ATTACHED

to be filled by
Advocate

Note: The entries on 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: ABDUL MUSAWIR

2. Race: AFGHAN

3. Residence: Village Amirabad (Rajjan) P/O, Tehsil & District Charsadda

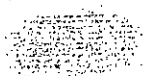
4. Father's name and residence: MUHAMMAD ALI


5. Date of birth by Christian era as nearly as can be ascertained: 09-02-1988

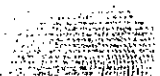
6. Exact height by measurement: 5-7"

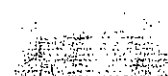
7. Personal marks for identification: N/A

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

Little Finger: 

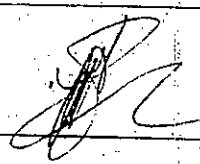
Ring Finger: 

Middle Finger: 

Fore Finger: 

Thumb: 


9. Signature of Government Servant:



Attested
S.D.E.O
Male Charsadda

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

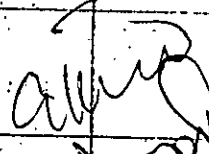
S.D.E.O
(M) CHD

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to be true copy
Advocate

1	2	3	4	5	6	7	8
	Substantive 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 emoluments falling under the term "pay"	Date of Appointment	
	PST G.P.S. Angaw Korbana Charsadda	B.P.S-12 (7000-500-2200)				31 ⁰⁵ / ₂₀₁₄	
		B12(9055-650-28555)			Arrival Date	31 ⁰⁵ / ₂₀₁₄	
	0		B 9055/			7 15	
	B12 (11140-800-35140)		B 9055/			12 15	
	0		B 11140/			7 16	
	B12 (13320-960-42120)		11140/			12 16	
	0		B 13320/			7 17	
			42120/				
	Revised Entry			S.D.E.O (M) Chd			Attended S.D.E.O Male Charsadda
	9/14		B12(7000-500-2200)			31 ⁵ / ₂₀₁₄	
			7000/-			12/14	
			7500/				
			7000				
				S.D.E.O (M) Chd			

ATTENDED
to be true copy
Advocate

13

9	10	11	12	13		14	15
Signature of the officer with authority to	Date of termination	Reasons for such termination	Signature and name of the officer with authority	Place	Classification of period leave for average leave for months of absence to be paid	Signature of the head of the office with authority	
				Part to	Government which draws		
					Appointed Against the vacant Post of PST vide D.E.O. (M) Charasadda dt. 31-05-2014 End Sl. No 4207-4958		
JH M.A.S. S.D.E.O (M) CHD					M.A.S. S.D.E.O (M) CHD		
						 M.A.S. S.D.E.O (M) Charasadda	
						M.A.S. to be true copy Advd.	

(14)

1	2	3	4	5	6	7	8
Name of Post	Substantive 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
		512 (9055 - 2850 - 2015)	9055	(2705)		7/15	
			9700	(7035)		12/15	
			11940	(2740)		7/16	
			12740	(3540)		12/16	
		112 (13025 - 760 - 4010)	15240	(16900)		7/17	
			16240	(7160)		12/17	
Office of the Accountant General Hyder Pakhunkhwa Peshawar Pay Fixed in the Revised Basic Pay Scales R.P.S. 9055-650-2855 B (12)			9055			01-07-2015	
Pay Fixed @ Rs			11140			01-07-2016	
Pay Fixed @ Rs			11940			01-07-2016	
Pay Fixed @ Rs			15240			01-07-2017	
Date of next increment is on						01-12-2017	
Account Officer Fixation Party							

A Annual Report may be produced

S.D.E. (M) CHD

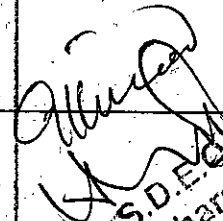
off paper out

Male charabada

ATTENDED
to be filed by
Advocate

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 or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	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
				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		
				Period	Government in which debitable		
<p>Revised Case Regularized</p> <p>7/15 9705/12</p> <p>7/16 12740/12</p> <p>7/17 16210/12</p>					<p>Service Verified w.o.f. 31/5/14 To 31/12/17 From acq Roll & other records of this office.</p>	<p>SDEO Charsadda</p>	
		<p>TR No. 562/1976</p>			<p>The PST Post was Regularized from the date of his app't. order No 19747-20188 dated 12-03-2018 at S.No. 95</p>	<p>S.D.O. Charsadda</p>	
		<p>41718/12</p>				<p>(Male) Charsadda</p>	
<p>Revised Case - 60 Regularized in Service 2/12/13</p>		<p>9055 613 16210/12</p>				<p>S.D.O. Charsadda</p>	
		<p>9705/12</p>				<p>S.D.O. Charsadda</p>	
		<p>1140 800 35140/12</p>					
		<p>12740/12</p>					
		<p>13370 960 42120/12</p>					
		<p>16210/12</p>					
		<p>Account Officer Party</p>			<p>to be tried by</p>		

1	2	3	4	5	6	7	8	9
Name of Post	Substantive 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 of the head or other authority in att colour
PST GPS Angar Koroan		BPS No-12 (13320-960-42120)	Rs 17160/-			12/18		
-DO-		Rs 18120/-				12/19		
SPST GPS		BPS No-14 (15180-1170-50280)	Rs 18690 + 1170 = 19860/-		✓	20- ^S 2020		


 S.D.E.O.
 Male Charsadda

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ANNEXURE - E

GOVERNMENT OF PAKISTAN
MINISTRY OF EDUCATION

SN: 275

P. Sec: 001 Month: December, 2011
CA7039 - Primary Male Checkbook
Min: Education, Schools
GPF No. 1710134018575
GPF Interest Applied
12 - Active Temporary
DATE: NONE

PERS. No. 00728935
Name: ABDUL MUSAWIR
Dsg: PRIMARY SCHOOL TEACHER
CRIC No. 1710134018575
GPF Interest Applied
12 - Active Temporary

PAYSTAND ALLOWANCES:

0001-Basic Pay	7,000.00
1900-House Rent Allowance	1,304.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,200.00
1971-Adhoc Allowance 2011@ 15%	653.00
1973-Adhoc Allowance 2011@ 50%	2,177.00
2118-Adhoc Relief Allow (2012)	1,400.00
2148-15% Adhoc Relief All-2013	1,050.00
2174-Adhoc Relief Allow-2014	700.00
Gross Pay and Allowances	36,604.00

DEDUCTIONS:

GPF Balance	2,320.00	Subtr.	2,160.00
3501-Benevolent Fund			120.00
3511-Addl Group Insurance			19.00
3604-Group Insurance			115.00
3990-Emp. Edu. Fund KPK			100.00
4001-Adj Benevolent Fund			180.00
4006-Adj Group Insurance			115.00
4075-Adj GPF			1,160.00
Total Deductions			3,130.00

Total Deductions

QUALIFYING SERVICE DE O-B
MOS 09.02.1986
00 Years 04 Months 001 Days

LEP Quota: 4
Payment through DDO.

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Advocate

20 19



D. O. B: 12/04/1989 LFP Quota: HBL
GOVERNMENT OF PAKISTAN
 ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA 3208
DISTRICT PAYROLL SYSTEM

UMERZAI

PAYMENT ADVICE

Charsadda		P Ser: 001 Month: January 2015	
BPS: 00728225		CA70 DEPT CODE Male Charsadda	
Name: ABDUL MUSAWIR		Min: Education Schools	
Dsg.: PRIMARY SCHOOL TEACHER		NTN:	
CHIC No. 1710134018575		GPF #: -	
GPF Interest Applied		Old #: -	
12 Active-Temporary		CA7039	
PAYS AND ALLOWANCES:			
0001-Basic Pay			7,000.00
1000-House Rent Allowance			7,304.00
1210-Convey Allowance 2005			2,834.00
1300-Medical Allowance			1,200.00
1971-Adhoc Allowance 2011@ 15%			653.00
1973-Adhoc Allowance 2011@ 50%			2,177.00
2118-Adhoc Relief Allow (2012)			1,400.00
2148-15% Adhoc Relief All-2013			1,050.00
2174-Adhoc Relief Allow-2014			700.00
Gross Pay and Allowances			55,028.00
DEDUCTIONS:			
GPF Balance	5,800.00	Subrc:	7,160.00
3501-Benevolent Fund			190.00
3511-Addl Group Insurance			13.00
3604-Group Insurance			115.00
3990-Esp. Edu. Fund KPK			100.00
5001-Adj Benevolent Fund		NET AMOUNT PAYABLE	360.00
5006-Adj Group Insurance			250.00
6075-Adj GPF			2,320.00
QUALIFYING SERVICE			
YRS: MON			4,675.00
Total Deductions			50,348.00

to be paid by

20

ANNEXURE - F

To:

The District Education Officer (DEO) (Male),
Charsadda.

Subject:

DEPARTMENTAL APPEAL AGAINST THE
ILLEGAL DEDUCTION OF INCREMENT FOR THE
YEAR 2014 AND NOT ALLOWING /GRANTING
SALARIES FOR THE MONTH OF JUNE, JULY AND
AUGUST 2014

Respected Sir,

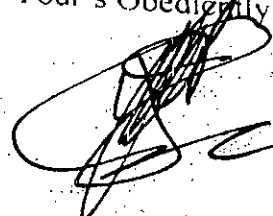
Most respectfully it is stated that I am appointed as PST BPS-12 vide order dated 31.05.2014. I submitted arrival on 31.05.2014 and since then performing my duty. The attendance register is evident that from the date of arrival I am performing my duties. the increment for the year 2014 was included and allowed to me but subsequently was deducted from me in 2017 and later on was re-fixed in January 2020 but till date the same has not been included in my pay.

It is, therefore most kindly requested that the increment for the year 2014 may be included in my pay alongwith the back benefits and the salary for the months of June, July and August 2014 may also issue and oblige please.

ATTESTED

to be true copy
of the original

Your's Obediently,



Abdul Musawir
SPST GPS Angar Korona Rajjar

Dated: 09.07.2021

21

ANNEXURE - G



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) E&SE CHARSADDA**

☎ 091-9220481 ✉ emischarsadda@yahoo.com

No. 12565 /dt 16 / 9 2021

To

Mr. Abdul Musawir SPST,
GPS Angar Koroona.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ILLEGAL DEDUCTION OF INCREMENT FOR THE YEAR 2014 AND NOT ALLOWING/ GRANTING SALARIES FOR THE MONTH OF JUNE, JULY & AGUST 2014.

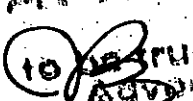
Memo:-

I am to refer to your appeal on the subject cited above and to ask you that you were appointed as PST on 31-05-2021 and took over charge on the same date while according to the condition No. 09 of the appointment order charge should be assumed after production of Health & Age certificate from the concerned Medical Superintendent which was issued on 02-06-2014. Ongoing through the findings of the case it has been observed that you violated the said condition & rules and illegally took over charge.

Keeping in view the above mentioned facts you are not entitled for increment, therefore. your appeal has been regretted.


DISTRICT EDUCATION OFFICER
(M) CHARSADDA

ATTESTED

to  true copy
Advocate

(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____

SCANNED
KPST
Peshawar
10/2021

ABDUL MUSAWIR

VS

EDUCATION DEPARTMENT

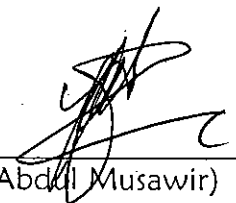
I, Abdul Musawir do hereby nominated and appointed **MUHAMMAD MAAZ MADNI**, Advocate High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred in the above matter as and is agreed to sign and file petition, appeals, statements, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc and to apply for and issue summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceedings that may arise there out; and to apply for and receive payment of any or all sums or submit the above matter to arbitration, and to employ an 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 to do all acts legally necessary to manage and conduct the said case in all respects whether herein specified or not, as may be proper and expedient.

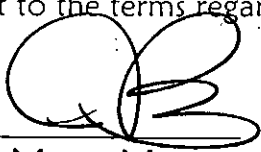
AND I/WE hereby agree to ratify and confirm all lawful acts done on my/our behalf; under or by virtue of these present or of the usual practice in such matter. PROVIDED always that I/WE undertake at the time of calling of the case by the court I/MY authorized agent shall inform the advocate and make him appear in the court, if the case, may be dismissed in default, it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHERE OF I/We hereunto set MY/OUR hand to these presents, the contests of which have been explained to and understood by ME/US this 14th day of October 2021.

EXECUTANT


(Abdul Musawir)

Accepted subject to the terms regarding fees:


MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
BC No. (BC-11-1460)
CNIC No. 17101-9263898-1

OFFICE: KHATTAK LAW ASSOCIATES, Juma Khan Plaza, Warsak Road, Peshawar.
Contact#: 0333-9313113, 0345-9090737

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7597/2021

Abdul Musawir


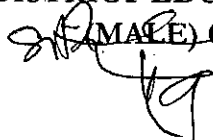
Vs

Govt of Khyber Pakhtunkhwa & others

SCANNED
KPS
Peshawar

INDEX

S No	Description	Annexure	Page
1	Comments		01-03
2	Affidavit		04
3	Amended appointment order	A	05-10
4	Health certificate	B	11
5	Advertisement	C	12

 Respondent
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA


①

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 7597/2021

Abdul Musawir

Vs

Govt of Khyber Pakhtunkhwa & others

Written comments on behalf of Respondents

Preliminary Objections:

Respectfully Sheweth:

- A. That the Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore, the Appeal is liable to be rejected/dismissed.
- C. That the Appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory costs in favour of Respondents.
- D. That no legal right of the appellant has been violated, therefore, the appellant has no right to file the instant appeal.
- E. That the Appellant is completely estopped/precluded by his own conduct to file this Appeal.
- G. That the Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from misstatements and concealment of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Appellant has no right to file the instant Appeal and the Hon' able Services Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the instant appeal is barred by law and limitation.

PARA WISE REPLY ON FACTS:

1. That the Para is subject to cogent evidence.
2. That though initially the appellant was appointed on 31/05/2014, but the appointment order of the appellant and his colleagues was amended and in this regard a corrigendum was issued. The amended order directed the appellant and many of his colleagues to take their charge from 01/09/2014, because of long summer vacations to save the public exchequer. *(Copy of corrigendum order is attached as annexure A)*
3. That perusal of the appointment order condition at serial No. 9 clearly shows that the appellant should take charge of his duties after the production of medical/health certificate meaning thereby, that no one could take charge before producing his health certificate. The appellant health certificate shows, that it was issued on 02/06/2014, then how it is possible that the appellant took charge on 31/05/2014, *(Copy of health certificate is attached as annexure B)*
4. That the appellant had been directed in the amended appointment order to take charge of his duties from 01/09/2014, therefore, his service too was regularized from 01/09/2014 and amendment in appointment order is absolutely according to the conditions at serial No 9 in advertisement *(Copy of advertisement is attached as annexure C)*
5. That the para needs no comments.
6. That the appointment order of the appellant had been amended due to long three months summer vacations which usually start from 1st June, terminates on 31st august therefore, had been directed to take charge after summer vacations i.e on dated 01/09/2014, hence in the perspective of amended appointment order is not entitled for any kind of relief. It is a famous maxim and judgments of the Hon `able superior courts that when there is no duty there is no pay.
- 7-8. That appellant is not an aggrieved party, therefore, can't file the instant appeal and this Hon `able Tribunal may graciously be pleased to dismiss the instant appeal on the following grounds amongst others.

GROUND

- A. That the answering Respondents acted in accordance with law, because the appellant medical certificate shows that it was issued on 02/06/2014, therefore, how can the appellant took charge on 31/05/2014, therefore, the sole ground is enough for dismissal of appeal.
- B. That the para as stated is incorrect, the answering Respondents are law observing officials and always respected the law and rules.
- C. That para as stated is incorrect because the term and condition No.9 of the appointment order fulfilled on 02/06/2014, then how the appellant can take charge of his duties on the same day, further the appellant has served less than 180 days on 1st December 2014 therefore, is not entitled for annual increment.
- D. Incorrect, the appellant is not entitled for the increments and other benefits, because of the amended appointment order.

E. That the para as stated is irrelevant to the present circumstances of the appeal hence, can't be replied, however, as the amended appointment order and the appellant medical certificate clearly indicates that the appellant has not taken over charge on 31/05/2014, hence, is not entitled for any kind of benefits.

F.G. That the para has already been replied in the above paras in facts.

H. That the Answering Respondents seek permission of this Hon'able Tribunal to submit other grounds at the time of heaving of the instant appeal.

~~29/01/2022~~
Respondent

(No-2) DISTRICT EDUCATION OFFICER
(MALE) CHARSAKDA

(No-1 & No-3) Director

Inspector

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 7597/2021

Abdul Musawir


Vs

Govt of Khyber Pakhtunkhwa & others

AFIDAVIT

I Mr. Umar Zaman DEO (M) Charsadda do hereby solemnly affirms that the information provided by the DEO (M) and the contents of the Para-wise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able tribunal.

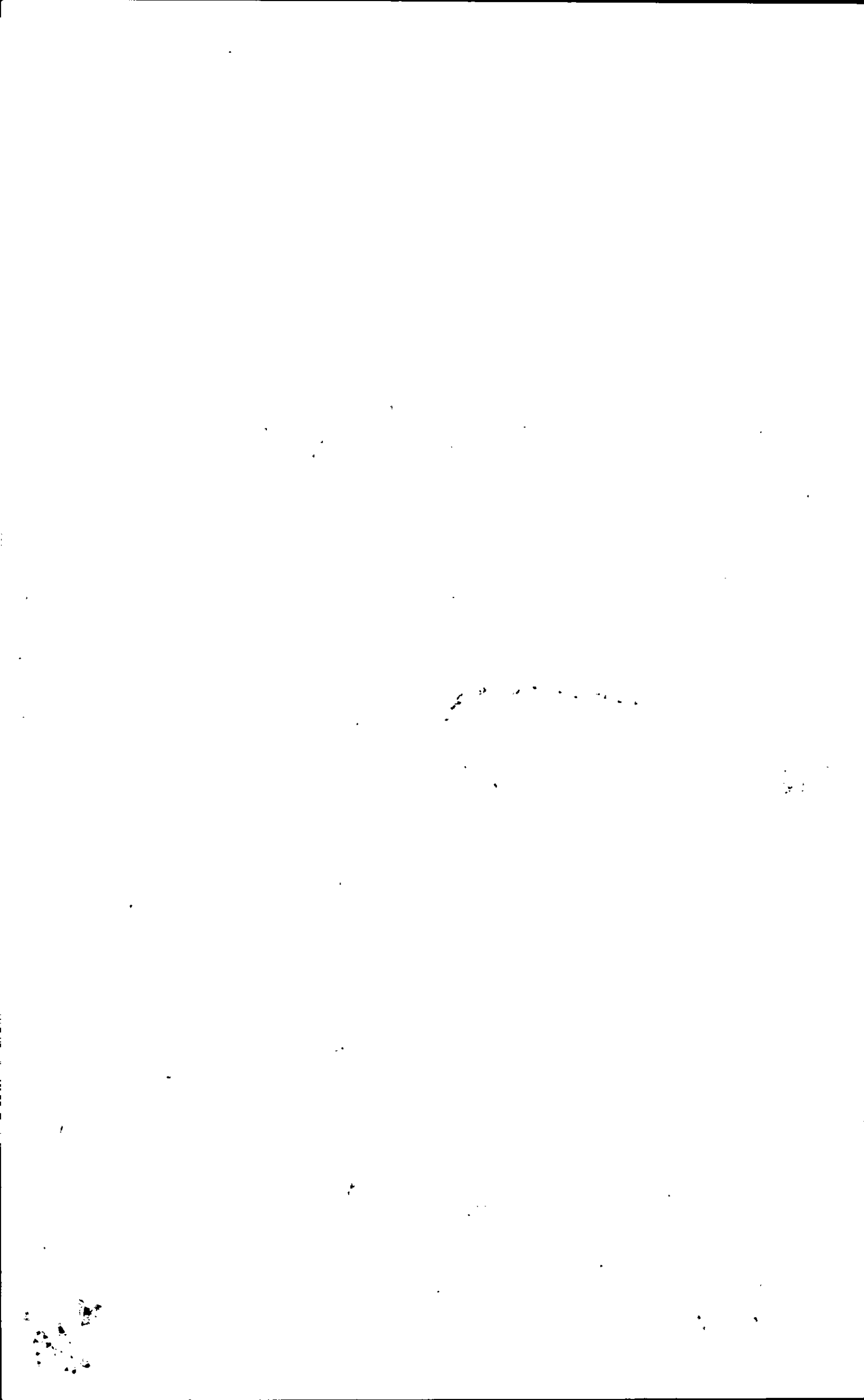
Deponent

 29/01/2022

(Umar Zaman)

DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA





To be substituted with No and Date
Appointment Order PST Ad hoc Basis

A
Amex
5

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

APPOINTMENT

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST School based/UC based in BPS-12 (Rs: 7000-500-22000) @Rs: 7000/= fixed plus usual allowances as admissible under the rules on ad hoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from 01-09-2014.

PST BPS-12

S.#	Name	School Name	U/C	Score
1	MUHAMMAD KHALID 17102-6537002-5	GPS Station Killi	Abazai	132.89
2	MARJAN ALI 17101-9766071-5	GPS Sheikh Killi	Agra	121.21
3	MIAN ADIL SHAH 17101-6844013-5	GPS Agra Bala	Agra	116.33
4	MUHAMMAD AMIN 17101-9188159-3	GPS Agra Bala	Agra	114.58
5	TILAWAT SHAH 17101-0113694-5	GPS Mandizai	Battagram	133.59
6	MUHAMMAD SHOAIB 17101-0315588-7	GPS Ashra	Battagram	129.66
7	SILAH ANWAR 17101-0399895-3	GPS Marozai	Battagram	124.24
8	MUHAMMAD ASIM 17101-7492491-7	GPS Mathra No.6	Battagram	121.45
9	SILAH KHALID 17301-4432180-5	GPS Mathra Qadeem	Battagram	119.30
10	NASIR KHAN 17101-0307093-1	GPS Khisro Khan Killi	Behlola	135.48
11	MUHAMMAD ISHTIAQ 17101-3765891-7	GPS Mian Shakh No.6	Behlola	132.34
12	YASEEN KHAN 17101-2716399-9	GPS Salar Killi	Behlola	132.18
13	NIZAM ULLAH 17101-6378689-5	GPS Islam Abad Dargai	Dargai	135.83
14	MUHAMMAD ALI 17101-0300786-9	GPS Na'raqi-1	Daulat Pura	118.45
15	IKRAM UL HAQ 17101-6170115-7	GPS Ambadher-1	Daulat Pura	116.29
16	ASIF ULLAH 17101-0826588-1	GPS Daulat Pura	Daulat Pura	114.31
17	UMAR GUL 17101-6375764-1	GPS Azli Abad-2	Dheri Zardad	121.66
18	ABDURAHMAN 17101-0342715-1	GPS Jan Abad	Dheri Zardad	114.33
19	DAWOOD MASOOD 17101-0328797-7	GPS Kalyas	Dheri Zardad	104.56
20	ZAFAR ALI 17101-0260821-7	GPS Doschra-3	Doschra	116.17
21	MUHAMMAD GULZAR 17101-2239656-1	GPS Haryana-2	Doschra	111.12
22	SIKANDAR SHAH 17101-2156902-9	GPS Check Nissat	Doschra	118.55
23	JAWAD MUHAMMAD 17101-1671324-1	GPS Shah Dhand	Doschra	117.17

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Appointment Order PST Ad hoc Basis

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24	KHIZAR HAYAT 17102-7968271-1	GPS Gandheri Payan No.1	Gandheri	137.0
25	MUHAMMAD PERVEZ 17102-6620616-9	GPS Gandheri Balu	Gandheri	133.58
26	ZAHID MUHAMMAD 17102-9586608-9	GPS Gandheri Payan No.2	Gandheri	128.93
27	SHAKEEL AHMAD 17102-8379651-9	GPS Karimo Banda	Gandheri	123.06
28	WAQAR KILAN 17101-5363178-3	GPS Malka Dher	Ghunda Karkana	116.56
29	KAMRAN ULLAH 17101-0319290-9	GPS Malka Dher	Ghunda Karkana	115.09
30	SILAMS UL HAQ 17101-1857398-9	GPS Baz Mian Kith	Ghunda Karkana	105.70
31	REHMANULLAH 17103-0354096-1	GPS Ocha Wala-1	Haji Zai	122.25
32	ALI GAUIAR 17103-0371185-7	GPS Mahmood Abad	Haji Zai	117.8
33	ANWAR ZEB 17102-3704269-7	GPS Inzar Killi	Harichand	124.53
34	JAWAD ALI 17101-1922862-5	GPS Khubai	Hassan Zai	128.94
35	MUHAMMAD IZHAR 17101-3845983-7	GPS Hassan Zai	Hassan Zai	123.63
36	NASEEM KILAN 17101-0395647-3	GPS Sokhta-1	Hassan Zai	121.11
37	ARSILAD KILAN 17101-8362252-7	GPS Kotak	Hassan Zai	115.33
38	MEHROZ KILAN 17102-0537988-3	GPS Gul Abad Tangi	Hisara Nehri	143.57
39	ASAD ALI 17102-2121297-9	GPS Gul Abad Tangi	Hisara Nehri	135.72
40	SHAHID KILAN 17102-870858-1	GPS MS Gul Qilla	Hisara Nehri	129.44
41	SHER ALI 17101-8836640-3	GPS Kangra	Kangra	131.62
42	NOOR ULLAH JAN 17101-0167274-9	GPS Ghurambak	Kangra	124.02
43	FATHUL AMIN 17101-9343851-3	GPS D.Sikandar Chan	Kangra	116.54
44	SHAD MUHAMMAD 17101-7588487-3	GPS Haryana	Kangra	115.98
45	NAEEM JAN 17101-9764384-5	GPS Haryana	Kangra	115.19
46	ABDUR RAFI JAN 17101-6321182-5	GPS Sadar Garhi-3	Katozai	99.35
47	SYED ZAHIEER AHBAS 17101-0960254-5	GPS Spinkai-1	Katozai	96.43
48	BAKHT TAJ GUL 17101-2528410-5	GPS Dherai Kor	Katozai	122.51
49	ZIA RAFIQ 17101-0377826-3	GPS Katozai-1	Katozai	120.86
50	MUHAMMAD AWAIS 17101-4275472-1	GPS Katozai-2	Katozai	112.95
51	SHER BAZ KILAN 17101-9168708-7	GPS Spinkai-2	Katozai	105.58
52	ZULFIQAR ALI 17101-0310390-9	GMPS Chamayya	Khan Mahi	128.51
53	RIAZ AHMAD 17102-9703868-5	GPS Landi Roud	Koz Behram Dheri	132.39

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Appointment Order PST Ad hoc Basis



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54	AMROOZ KHAN 17102-2651249-1	GPS Landi Roud	Koz Behram Dheri	122.07
55	MAJID KHAN 17102-7714899-5	GPS Arat Killi	Koz Behram Dheri	119.64
56	MUKJITAR ULLAH 17102-1163872-1	GPS Islamabad Deobandi	Koz Behram Dheri	119.22
57	NAZIR AHMAD 17102-6036836-7	GPS Mardhand No.1	Koz Behram Dheri	112.46
58	WISAL AHMAD 17103-0348097-5	GPS M. Rustam Khel	M.M Khel	131.51
59	ABDUS SALAM 17301-3407039-1	GPS Matta Mughal Khel	M.M Khel	124.18
60	SAEED KHAN 17101-7276529-5	GPS Matta Mughal Khel	M.M Khel	114.32
61	WISAL AHMAD 17101-4418097-3	GPS Hassan Gul Kor	M.M Khel	106.07
62	RAHAM SHID KHAN 17101-9461238-9	GPS Krapa Muhammad Khan	M.M Khel	105.96
63	SYED ZIAUDDIN BASHIR 17101-0275214-9	GPS Daryab Kor	M.M Khel	104.98
64	YASIR KHAN 17102-2872837-3	GPS Mandani	Mandani	112.51
65	MUHAMMAD TAYYEB 17102-7302181-1	GPS Tangi No.1	MC Tangi	133.24
66	MUHAMMAD ISMAIL SHAHID 17102-0407188-7	GPS Tangi No.3	MC Tangi	123.96
67	MUHAMMAD DAWOOD KHAN 17102-7433487-7	GPS Tangi No.1	MC Tangi	118.34
68	KHALIL ULLAH 17101-0401414-5	GPS Utmanzai-3	MC Utmanzai	124.07
69	ROOH UL AMIN 17101-0365780-5	GPS Dag Shamoza	MC Utmanzai	113.31
70	FARIHAD ALI 17101-3658119-9	GPS Katigon	MC Utmanzai	108.25
71	MUHAMMAD YAR 17101-0310807-3	GPS Charsadda-3	MC-1 Charsadda	130.01
72	MUHAMMAD ADIL JAN 17101-9006856-5	GPS Bosa Khel-2	MC-1 Charsadda	104.12
73	MOAZAM JAN 17101-8006111-9	GPS Qazi Khel-2	MC-1 Charsadda	122.53
74	BAKHT MUNIR 17101-0397973-1	GPS Sadiq Abad	MC-1 Shabqadar	126.67
75	IRFAN ULLAH 17301-4722563-9	GPS Rahmatullah Khan Kor	MC-1 Shabqadar	118.4
76	MAJID SHAH 17101-8067215-1	GPS Rahmatullah Khan Kor	MC-1 Shabqadar	109.49
77	INAM UL HASSAN 17101-1254810-1	GPS Tambulak	MC-2 Charsadda	121.71
78	MUHAMMAD ZEESHAN 17101-9729175-5	GPS Khat Killi	MC-2 Charsadda	115.17
79	RASOOL SHAH 17101-4723473-3	GPS Prang-1	MC-2 Charsadda	114.8
80	ASFANDIYAR 17101-3975974-3	GPS Prang-3	MC-2 Charsadda	109.01
81	ZAFAR KHAN 17101-7165544-7	GPS Shabqadar Fort-2	MC-2 Shabqadar	99.7
82	DILAWAR SHAH 17101-4119772-5	GMPS Babra	MC-3 Chid	114.04
83	TARIQ JAN 17101-1602078-9	GPS Attaki-3	MC-3 Shabqadar	96.94
84	HISAN ALI 17103-0368397-7	GPS Attaki-3	MC-3 Shabqadar	94.47

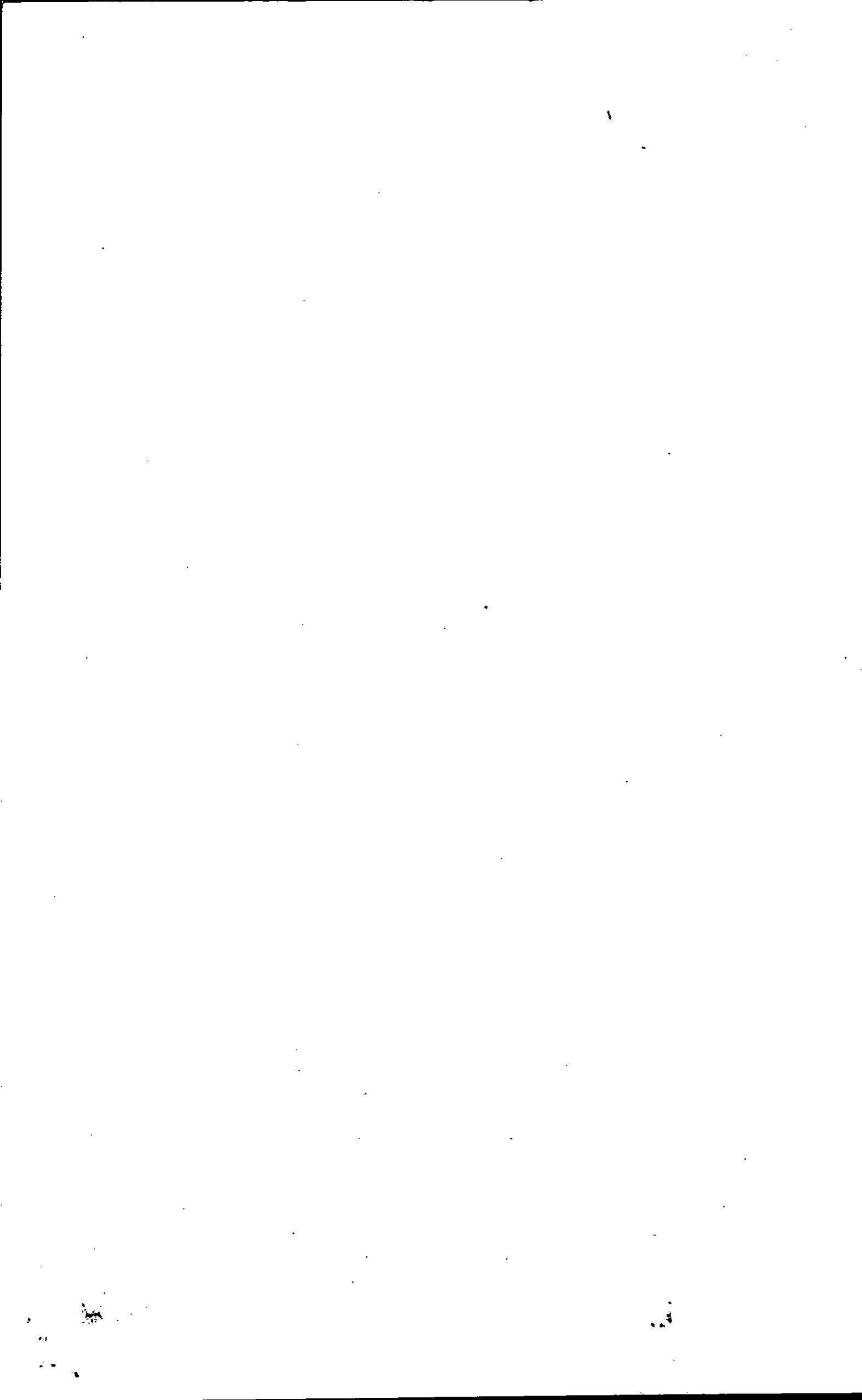
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To be substituted with No and Date
Appointment Order PST Ad hoc Basis

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87	EMAN HUSSAIN 17101-0949488-7	GPS Gonda	MC-3 Shabqadar	122.0
88	MOHIB ULLAH 17101-0108796-9	GPS Attaki-2	MC-3 Shabqadar	100.96
89	SAYYED MASOOD AHMAD 17101-2505470-1	GPS Attaki-2	MC-3 Shabqadar	100.85
90	NAZALI 17101-1124090-3	GPS Attaki-3	MC-3 Shabqadar	100.07
91	USMAN ALI 17101-5122374-1	GPS Asmat Abad	MC-4 Charsadda	115.6
92	HISAN ULLAH ALIAS ASAD 17101-0308575-3	GPS Umar Abad	MC-4 Charsadda	115.34
93	NUSRAT ALI 17101-0253339-3	GPS IslamAbad-2	MC-4 Charsadda	101.79
94	WAJID ULLAH 17101-0413010-5	GPS Faqir Abad	Mera Prang	143.47
95	FAZAL AMIN 17101-0958822-3	GPS Sheikh Munaf killi	Mera Umarzai	125.38
96	MUIA AMAD IMRAN 17101-9521339-3	GPS Ewaz Killi	Mera Umarzai	124.57
97	ALAMZEB KHAN 17101-3836322-3	GPS Nauab Khan Koro	Mera Umarzai	117.94
98	ASIF SHAJI 17101-2062079-9	GPS Shahrano Killi	Mera Umarzai	116.10
99	SHAHID ALI 17102-9561338-5	GPS Dildar Garhi	Mirza Dher	120.42
100	ISHTIQ AHMAD 17102-5847695-7	GPS Mian Sahil Garhi	Mirza Dher	115.90
101	YASIR KHAN 17101-0203548-5	GPS Inam Killi	Muhammad Nari	125.6
102	QAISAR ALI 17101-7317747-3	GPS Muhammad Nari	Muhammad Nari	118.45
103	SHAHID KHAN 21407-5793986-5	GPS Shah Afzal Abad	Muhammad Nari	118.25
104	WAJID ULLAH 17101-0357508-5	GPS Ghandail Khan Kor	Nissatta	132.78
105	SHEHER GILAYAS KHAN 17101-7071293-3	GPS Parao-1	Nissatta	130.3
106	NIAMAT ULLAH 17101-2435986-3	GPS Mian Isa	Panjpao	141.53
107	ROKMAN ALI 17101-9080500-9	GPS Dalazak	Panjpao	133.56
108	ZUBAIR KHAN 17103-0342333-9	GPS Shahbaz Khan Kor	Panjpao	125.45
109	MIRZA ALI KHAN 17103-0340645-5	GPS Pir Qilla No.1	Panjpao	122.66
110	SHAH MUIA AMAD 21407-4142405-3	GPS Yarjan Killi	Panjpao	114.36
111	AKHTER ALI 17101-0257749-1	GPS Angar Kor	Rajjar-1	144.92
112	ABDUL MUSAWIR 17101-3401857-5	GPS Angar Kor	Rajjar-1	132.1
113	OWAIS ULLAH 17101-7120368-1	GPS Sulai Kamar	Rajjar-1	112.43
114	SHAH AYAZ UDDIN 17101-0271844-3	GPS Rajjar-1	Rajjar-1	102.35
115	TAHIR ALI SHAH 17101-8707068-5	GPS Shakar Dhand	Rajjar-2	118.74
116	ATTA ULLAH JAN 17101-0983778-5	GPS Rahima	Rajjar-2	117.28
117	MANZOOR ALI 17101-1819839-7	GPS Gujrano Killi	Rajjar-2	109.71

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Appointment Order PST Ad hoc Basis

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109	MUHAMMAD BASIR 17101-420852-7	GPS Wardaya-1	Rajjar-2	107.59
110	ABDUL ULLAH 17101-0320758-7	GPS Kodai-2	Rashakai	96.2
111	MUSTAFA ZEB 17101-4604519-5	GPS Rashakai	Rashakai	93.93
112	ABDULLAH KILAN 17101-6417232-9	GPS Zrawar Khan Kor	Rashakai	87.29
113	GUL RAJ KHAN 17101-4325646-3	GPS Banda Rashakai	Rashakai	118.53
114	ZAKIR ULLAH 21407-5670864-5	GPS Banda Rashakai	Rashakai	117.43
115	MUHAMMAD SAJJAD 17101-4895884-3	GPS Ghundai Kor	Rashakai	114.17
116	KHAN MUHAMMAD 17101-059434-5	GPS Mian Killi-1	Rashakai	107.21
117	KARAM ILAHI 17101-0321468-5	GPS Ajoon Killi	Sarki Titara	127.52
118	ISHTRIAQ AHMAD 17101-2752491-3	GMPS Hayat Gul Kor	Sarki Titara	124.92
119	FAWAD AHMAD 17101-0303540-3	GPS Jalal Killi-2	Sarki Titara	118.25
120	IRSILAD ALI 17101-0993454-5	GPS Anwar Killi-1	Sarki Titara	120.41
121	ZAIN UL ABIDEEN 17101-4689553-3	GPS Sarki Titara-1	Sarki Titara	112.05
122	JAMIL MUHAMMAD KHAN 17101-0377280-9	GPS Haqdar Qalarai	Sarki Titara	111.20
123	MUSTAFA 17102-9575090-9	GPS Chail	Shodag	134.38
124	HARON KHAN 17101-3800476-1	GPS D. Ghulam Qadir	Tarnab	130.34
125	SILVAB ALI 17101-0874659-3	GPS D. Mukarram Khan	Tarnab	110.7
126	MUDASSIR SILAH 17101-3398831-9	GMPS Tankhazai	Turangzai	126.55
127	WAQAR ALI SHAH 17101-7624422-5	GPS Anwar Mahal-2	Turangzai	121.33
128	ZIA ULLAH 17101-7128195-1	GPS Anwar Mahal-2	Turangzai	112.97
129	MUHAMMAD YASIR 17101-8371336-5	GPS Eidgah	Umarzai	121.89
130	WASIQ JAN 17101-6328961-3	GPS Umarzai-2	Umarzai	118.65
131	NAEM JAN 17101-0332021-1	GPS Yakh Kohi	Umarzai	115.59
132	ATTAULLAH NOOR 17101-5067018-7	GPS Zahoore Abad	Umarzai	113.8
133	AFTAB AHMAD 17101-9526663-5	GPS Chitla Dherat	Umarzai	109.25
134	SABER SHAH 17102-8126097-7	GPS Zuhra Gul	Ziam	130.50
135	MUHAMMAD TUFAIL 17102-6314292-7	GPS Hamaish Gul Killi	Ziam	129.4
136	ROSHAN KHAN 17102-4224859-5	GPS Ali Jan Killi	Ziam	122.65
137	YOUSAF KHAN 17102-9866008-5	GPS Hisara Miana	Ziam	118.35

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To be substituted with No and Date
Appointment Order PST Ad hoc Basis

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2014

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract 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 the certificate/documents must be verified from the concerned authorities by the DEO (concerned). Anyone 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 drawn until and unless a certificate to the effect by DEO (concerned) is issued that his certificates are verified
8. He should join his post within 10 days of the issuance of this notification. In case of failure to join their post within 10 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. Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
13. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

-SD
(Siraj Muhammad)
District Education Officer
(Male) Charsadda

Endst: No: 1807-1958/Dated: Charsadda the 31/05/2014

- Copy forwarded for information and necessary action to the: -
1. Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
 2. Deputy Commissioner Charsadda
 3. District Accounts Officer Charsadda
 4. SDEO (M) Charsadda
 5. SDEO (M) Tangi
 6. Official Concerned
 7. ✓ M/File

31/5/14
District Education Officer
(Male) Charsadda

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MEDICAL CERTIFICATE

B Area
(11)

Name of Official ABDUL MUSAWIR

Caste or race Ajolan

Father's Name MUHAMMAD - ALI

Residence Amir abad (Rajon) P/O, Tehsil
& District Charsadda

Date of birth 09-02-1988

Exact height by measurement 5 feet 7 inches

Personal mark of identification: Nil

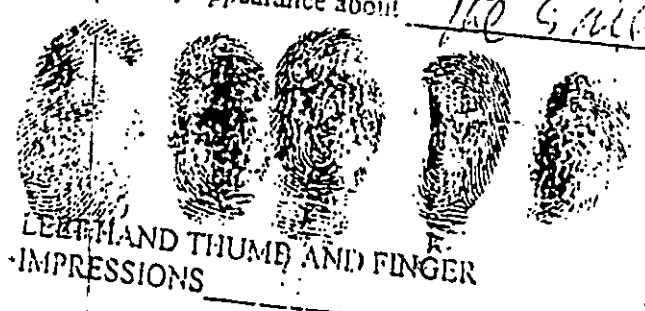
Signature of the Official *[Signature]*

Signature of head of office _____

Seal of Office _____

I do hereby certify that I have examined Mr Abdul Musawir
a candidate for employment in the office of the Elementary & Secondary Education C.H.O.
and can not discover that he had any disease communicable or other constitutional
affection or bodily infirmity except N.I.C.

I do not consider this as disqualification for employment in the office of the
His age according to his own statement is 25 years
years and by appearance about 26 years.



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-IMPRESSIONS

[Signature]
Medical Superintendent
DHQ Hospital Charsadda

[Signature]
2/11/04

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محکمہ تعلیم و ترقی کے زیر اہتمام مردانہ سکولوں میں مندرجہ ذیل کیڈر کی خالی آسامیوں پر ایچ پک سکول (Adhoc School Based) تقریبوں کے لئے ضلع چارسدہ کے سکولوں کی امیدواروں سے مجوزہ فارم پر مورخہ 20 جنوری 2014ء تک درخواستیں مطلوب ہیں۔
درخواست فارم این ٹی ایس (NTS) کی ویب سائٹ (<http://www.nis.org.pk>) پر دستیاب ہے۔ یا اسے کہ حاصل اور مقررہ تاریخ گزرنے کے بعد وصول ہونے والی درخواستوں پر غور نہیں کیا جائیگا۔

C
Aqua
(12)

نمبر شمار	نام آسامی	تعلیمی قابلیت	حرجی حد
1	سی ٹی BPS-15	بی اے، بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±18 سال
2	ڈی ایم BPS-15	بی اے، بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±18 سال
3	بی ای ٹی BPS-15	بی اے، بی ایس سی یا مساوی قابلیت کسی بھی تسلیم شدہ یونیورسٹی سے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±18 سال
4	اسٹی BPS-15	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ یونیورسٹی سے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±20 سال
5	بی ٹی BPS-15	ایس ایس سی (سیکنڈ ڈویژن) کسی بھی تسلیم شدہ یونیورسٹی سے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±20 سال
6	قاری BPS-12	انٹرمیڈیٹ ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±18 سال
7	بی ایس ٹی BPS-12	انٹرمیڈیٹ یا مساوی سرٹیفکیٹ کسی بھی تسلیم شدہ یونیورسٹی سے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری ان ایجوکیشن کسی بھی تسلیم شدہ یونیورسٹی سے یا 18 (اٹھارہ) ماہ کا ڈپلوما ان ایجوکیشن	35±18 سال

سلیکشن کرٹیریا: (Selection Criteria)

اساتذہ کے سلیکشن کنٹریکٹس مورخہ 20 جنوری 2014ء تک 200 نمبرات کی تقسیم اس طرح سے کی جائیگی۔

اسکریننگ ٹیسٹ بذریعہ NTS = 100 نمبر

ب۔ تعلیمی قابلیت = 100 نمبر جس کی مزید تقسیم اس طرح ہوگی

تعلیمی قابلیت	کل نمبر
ایس ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
ایف اے / ایف ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
بی اے / بی ایس سی	حاصل کردہ نمبر 20x تقسیم کل نمبر
ایم اے / ایم ایس سی	حاصل کردہ نمبر 15x تقسیم کل نمبر
ہر آسامی کیلئے مطلوبہ پیشہ ورانہ قابلیت	حاصل کردہ نمبر 15x تقسیم کل نمبر
ایم اے / ایم ایس سی	حاصل کردہ نمبر 05x تقسیم کل نمبر
ایم اے / بی ایس سی	حاصل کردہ نمبر 05x تقسیم کل نمبر

نوٹ: 1۔ ہر سکول کی آسامی کیلئے علیحدہ علیحدہ میرٹ لسٹ مرتب کی جائیگی۔ 2۔ NTS کے نتائج کے مطابق ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری حاصل کردہ امیدواروں کے لئے آسامیوں کی تقسیم اس طرح سے کی جائیگی۔
3۔ (2) ہر امیدوار سے NTS کی درخواست فارم 300 روپے چارج کیا جائیگا۔ اگر ایک امیدوار (50 روپے) کے درخواست دہندگان سے صرف 200 روپے NTS چارج کریگا۔ جو کہ امیدوار خود برداشت کریگا۔

عمومی شرائط: (1) تمام امیدواروں کے ڈویژنل اور شناختی کارڈ میں مستقل سکونت ضلع چارسدہ کا ہونا چاہیے۔ (2) تمام امیدواروں کے لئے ہجرتی سرٹیفکیٹ یا 2 سال ایسوسی ایٹ ڈگری حاصل کرنا ضروری ہے۔ اگر ایسی یونین کونسل میں امیدواروں کی سکونت ہو تو وہ اس کی کاپی ہجرتی سرٹیفکیٹ کے ساتھ فراہم کرنی چاہیگی۔ (3) تمام امیدواروں کی عمر 18 سال سے زیادہ ہونی چاہیگی۔ (4) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (5) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (6) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (7) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (8) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (9) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (10) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (11) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (12) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (13) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (14) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (15) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (16) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (17) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (18) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (19) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔ (20) تمام امیدواروں کی عمر 35 سال سے زیادہ ہونی چاہیگی۔

SCANNED
KPST
Peshawar

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3497

Dated 9/2/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO .7597/2021

Abdul Musawir.....Appellant.

V/S

Director Education Khyber Pakhtunkhwa Peshawar & others.....Respondents.

(Reply on behalf of respondent No. 3)

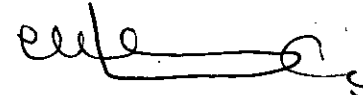
Respectfully Sheweth:-

Para :- 1 to 8:-

Being an administrative matter, the issue relates to Respondents No.1 & 2, and they are in better position to redress the grievances of the Appellant. Besides, the Appellant has raised no grievances against Respondent No.3.

It is pertinent to mention here that the appellant is the resident as well as working in District Charsadda and his service record also pertains to Respondent No. 1 & 2 as well as District Accounts Officer Charsaadda. Hence, the name of District Accounts Officer Charsadda may please be impleaded in the instant appeal instead to Respondent No.3

Keeping in view the above mentioned facts, it is humbly prayed that the name of the Respondent No.3 may be deleted from the list of Respondents.



ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO : 7597/ 2021

Abdul Musawir Appellant.

V/S

DIRECTOR Education Khyber Pakhtunkhwa Peshawar & others.....Respondents.

AFFIDAVIT

I Mian Tariq Shah Senior Auditor of the Accountant General Khyber Pakhtunkhwa Peshawar do here by solemnly affirms & declared that the contents of the reply submitted on behalf of respondent No. 3 is correct to the best of my knowledge and belief and nothing has been conceal from this honorable Court.

Yami

Deponent

NIC - 17301-1327637-9

cell - 0346-9191988

ATTESTED

