


FORM OF ORDER SHEET

Court of _____

Appeal No. 821/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/06/2024	<p>The appeal of Mr. Ishfaq Hussain presented today by Mr. Muhammad Maaz Madni Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 13.06. 2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 821 /2024

ISHFAQ HUSSAIN

V/S

DEO (M) CHD

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Dated: June 11th, 2024

APPELLANT

Through:



MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
TF-291-292, Deans Trade Centre,
Peshawar Cantt:
0333-9313113, 0345-9090737
muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal NO. 821 /2024

ISHFAQ HUSSAIN S/O Sadiq Hussain (SPST BPS-14),
Govt. Primary School, Sarfaraz Kali, Charsadda
r/o Village Deray, PO Ghazgi, Tehsil & District, Charsadda

..... APPELLANT

VERSUS

THE DISTRICT EDUCATION OFFICER (MALE),
District Charsadda.

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 READ
WITH ALL ENABLING LAWS & RULES AGAINST NOT
COUNTING OF PERVIOUS SERVICE SERVED SINCE 01-12-
2014 FOR THE PURPOSE OF PAY, PENSION &
PROMOTION INCLDING SENIORITY AND AGAINST NOT
TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL
DATED 12/02/2014 OF THE APPEAL WITHIN THE
STATUTORY PERIOD OF 90 (NINETY) DAYS.

PRAYER:

That on acceptance of this appeal the act & omission of the respondent by not counting the previous service of the appellant served since 01-12-2014 for the purpose of pay, pension & promotion including seniority may very kindly be declare as illegal, void abi initio & unconstitutional. That the respondent may further please be directed to count the previous service of the appellant served since 01-12-2014 for the purpose of pay, pension & promotion including seniority by following the PRINCIPLE OF PARITY. Any other remedy which this Tribunal deems appropriate and has not specifically been asked for that may also be awarded in favor of the appellant.

Respectfully Sheweth;

FACTS:

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

1. That appellant is a regular employee of the respondent Department and was initially appointed as PST (BPS-12) school based policy vide order dated 01-12-2014 for the said appointment the respondent has issued an advertisement wherein the last for submission of application form was 31-05-2012 and accordingly the appellant applied and was selected to the post.

Copy of Advertisement & Appointment Order dated 01.12.2014 is attached as ANNEXURE A.

2. That after receiving the appointment order dated 01-12-2014 the appellant was medically examined and was declared medically fit for government job; accordingly the appellant submitted his arrival/charge report on 03-12-2014.

Copy of Medical Certificate & Charge Report dated 03.12.2014 is attached as ANNEXURE B.

3. That respondent announced other PST posts through NTS in the year 2015 for which the appellant also applied, become successful and was accordingly selected to the post after fulfilling all the codal and legal requisite formalities vide appointment order dated 26-03-2016.

Copy of Appointment Order dated 26.03.2016 is attached as ANNEXURE C.

4. That the appellant tender resignation on stamp paper, got relieved from the post of 2014 and submitted his joining report on the same day for availing the charge of the post dated 26-03-2016, hence the continuity in the service between 2014 and 2016 remain intact with no break in both the services.

Copy of Resignation & Charge Report dated 28.03.2016 is attached as ANNEXURE D.

5. That service of the appellant was regularized vide order dated 12-03-2018 and as such similarly employees who are appointed in other District of the department are given benefit of FR-22 (b) by counting their previous service but the appellant has been deprived from such benefits and the previous service served since 2014 has not been counted towards pay, pension & promotion including seniority.

Copy of Regularization order dated 12.03.2018 Orders & Appellant Pay Slip is attached as Annexure E.

6. That feeling aggrieved from the acts & omission of the respondent by not counting the previous service served since 2014 towards pay, pension & promotion including seniority the appellant filed Department Appeal dated 12-02-2024.

which was forwarded to the respondent vide letter dated 12-02-2024 but no response has been received after lapse of statutory period of 90 days.

Copy of Departmental Appeal dated 12.02.2024 & Letter is attached as ANNEXURE F.

7. That the appellant feeling highly aggrieved and is left with no other remedy but to file the instant service appeal before this Tribunal on the following grounds:

GROUND S:

A- That act & omission on the part of the respondents by not counting the previous service served since 2014 towards pay, pension & promotion including seniority is against the law, rules, facts, void ab initio, Norms of Natural Justice and materials available on the record hence not tenable in the eye of Law and is liable to be set aside to the extent of the appellant.

B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

C- That the respondents acted in an arbitrary and malafide manner by not counting the previous service served since 2014 towards pay, pension & promotion including seniority.

D- That act & omission on the part of the respondents by not counting the previous service served since 2014 towards pay, pension & promotion including seniority is against Article 38 (e) of the Constitution of Pakistan, 1973 which is as:

“state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan.

E- That act & omission on the part of the respondents by not counting the previous service served since 2014 towards pay, pension & promotion including seniority is a clear violation of Article-37 of the Constitution of Islamic Republic of Pakistan which is regarding the eradication of social evils in the society and promotion of social justice.

F- That act & omission on the part of the respondents by not counting the previous service served since 2014 towards pay, pension & promotion including seniority is a clear violation of the Fundamental Rights as enshrines the Constitution of Pakistan & also against various judgments passed by the Apex Supreme Court of Pakistan.

G-That act & omission on the part of the respondents by not counting the previous service served since 2014 towards pay, pension & promotion including seniority hence the same is against the norm of Natural Justice.


H-That act & omission on the part of the respondents by not counting the previous service served since 2014 towards pay, pension & promotion including seniority is against CSR-418 as the resignation does not fall within the meaning of the parameters required for tendering of resignation from the post and as such the same also does not fall in the ambit of breakage in service.

I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 11-06-2024

APPELLANT


ISHFAQ HUSSAIN

Through:


MUHAMMAD MAAZ MABNI
Advocate High Court, Peshawar
0333-9313113, 0314-9965666

CERTIFICATE

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


ADVOCATE

AFFIDAVIT

I, ISHFAQ HUSSAIN s/o Sadiq Hussain, 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
17101-9653316-5
0313-5530022

6

**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA**

APPOINTMENT

Consequent upon the recommendation of the District Selection Committee, appointment of the following candidates (2012) are hereby ordered against the post of PST School /UC based in BPS-12 (Rs: 7000-500-22000) @Rs: 7000/= fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect.

S.No	Name	Father Name	U/C	Place of Posting	Remarks
1	Jauharudin	Saifuddin	Abazai	GPS Muslim Abad	AVP
2	Himayat Ullah	BismAllah Jan	Battagram	GPS Daman Batagram	AVP
3	Asfandiyar Khan	Amanat Gul	Behlola	GPS Behlola Bala	AVP
4	Almad Ali	Zardool Khan	Dharki	GPS Ajab Gul Killi	AVP
5	Jhanzeb Khan	Farid Khan	Dharki	GPS Chanchano Khat	AVP
6	Tahir Ali	Khaista Gul	Dherizardad	GPS Iqbal Abad	AVP
7	Arshad Ali	Sardar Ali	Dherizardad	GPS Sultan Abad	AVP
8	Aslam Khan	Roohelleh	Dulat Pura	GPS Kandari Dualat Pura	AVP
9	Rashid Khan	Hazar Khan	Ghanderi	GPS Ganji Dag No1	AVP
10	Gulab Noor	Sada Noor	Ghanderi	GPS Kachkol Killi	AVP
11	Mukhtar Ahmad	Noor Muhammad	Hassanzai	GPS Sokhta No1	AVP
12	Anwar Ul Haq	Fazli Khati	Hassanzai	GPS Tarnab	AVP
13	Hayat Ur Rehman	Khan Rehman	Hissara Nehri	GPS Hassan Abad	AVP
14	Kaleem Arif	Fazli Subhan	Hissara Yaseenzai	GPS Tora Pana	AVP
15	Manzoor Ahmad	Mukhtar Ahmad	Hissara Yaseenzai	GPS Tarkha Faqir abad	AVP
16	Anwar Ali Shah	Shahd Muhammad	Kangra	GPS Bakyana	AVP
17	Muhammad Younas	Abdul Wajid	Katozai	GPS Katozai No1	AVP
18	Riyaz Ullah Jan	Najeeb Ullah Jan	Katozai	GPS Bela No4	AVP
19	Syed Afzal Kara	Syed Ihsan Ullah	Katozai	GPS Katozai No1	AVP
20	Zaullah	Abdul Majeed	Khan Mai	GPS Zahid Abad	AVP
21	Mudassa Shah	Rhadin Shah	Khan Mai	GPS Zahid Abad	AVP
22	Sana ur Rehman	Ghoni Gul	Kor Bahram Dheri	GPS Landi Shah	AVP
23	Malik Saadullah	Malik Bahat Mir	M.M Khel	GPS Matta Rustam khel	AVP
24	Zam Ullah	Tal Zamin	M.M Khel	GPS Matta Rustam khel	AVP
25	Shahid Ahmad	Shahzada	M.M Khel	GPS Matta Rustam khel	AVP
26	Muhammad Wasif	Nisar Mohammed	Mir Prang	GPS Faqir Abad Majoki	AVP
27	Wasil Khan	Mhtar Gul	Mera Umerza	GPS Haji Noor shah	AVP
28	Hader Zaman	Mir Zaman	Mamran	GPS Hariband	AVP
29	Rafiq Shah	Ramind Gul	MC-I Chd	GPS Ghari hameed Gul	AVP
30	Aftab Ali Khan	M. Nawab Khan	MC-I CHD	GPS Charsadda No3	AVP
31	Tariq Zafar	Zafar Gul	MC-I CHD	GPS Bosa Kheil no2	AVP
32	Wahid Gul	Ghamb Gul	MC-I SKF	GPS Sharda SKF	AVP
33	Hannayano	Muhammad Khurshid	MC-II Chd	GPS Mian Killi Prang	AVP

ATTEST

7

	Ibrar ul Haq	Bahare Haq	MC-III SKF	GPS Nusratzai	AVP
35	Jumaid Khan	Ijaz Hussain	MC-IV CHD	GPS Babra No1	AVP
36	Muhammud Hamayoun	M Ashraf	MC-IV CHD	GPS Umar Abad No2	AVP
37	Suliman Shah	Rozi Khan	M.Nari	GPS Chatral Koroona	AVP
38	Ahmad Zeb	Pir Muhammad	Mirza Dher	GPS Mian Wali	AVP
39	Hussain Ahmad	Muhammad Tayyab	Mirza Dher	GPS Tolakai	AVP
40	Raj Wali Khan	Maazullah Khan	Mirza Dher	GPS Mian Wali	AVP
41	Fathiullah	Marifat Gul	Nisatta	GPS Mulyan Nissatta	AVP
42	Abdul Wahid	Zarqaish	Panjpao	GPS Mansoka	AVP
43	Maseehullah	Ierar Ali	Panjpao	GPS Maqal Koroona	AVP
44	Marjan Ali	Ghandal Khan	Rajjar - I	GPS Angar Koroona	AVP
45	Khadim Hussain	Mahmood ul Haq	Rajjar - II	GPS Shakar Dhand	AVP
46	Shakeel Hayat	Muhammad Nazir	Rashakai	GPS Kodai No2	AVP
47	Muhammad Imran	Arsala Khan	Rashakai	GPS Mian Killi No2	AVP
48	Mohsin Ahmad	Said Muhammad	Rashakai	GPS Shahid Gul Kor	AVP
49	Ashfaq Hussain	Sadiq Hussain	Sarki Titara	GPS Ijara Koroona	AVP
50	Muhammad Sawab	Husnul Maab	Sarki Titara	GPS Haqdar Qalarai	AVP
51	Ramdad Khan	Said Rahman	Sarki Titara	GPS Pervez Koroona	AVP
52	Sajjad Baig	Gul Baig	Sherpao	GPS Sherpao No2	AVP
53	Muhammad Tufail	Shahzada	Sherpao	GPS Kass Koroona	AVP
54	Muhammad Asad	Qazi Fazle Rabbi	Umarzai	GPS Umarzai No1	AVP
55	Zahid Ali	Malak Aman	Umarzai	GPS Umarzai No2	AVP
56	Manzoor Ahmad	Qamar Zaman	Ziam	GPS Nan Killi	AVP
57	Sajid Ali Shah	Shahjahan	Sheikho	GPS Khat Killi Prang	Disable Quota(AVP)

3/10/14

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. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO . Anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
5. 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. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that his certificates are verified.
6. 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.
7. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
8. Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
9. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
10. 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 preceded under the rules framed from time to time.

ATTEST

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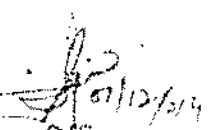
1. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
12. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

(Siraj Muhammad)
District Education Officer
(Male) Charsadda

Endst: No: 13806-69 / Dated: Charsadda the 01 / 12 / 2014

Copy forwarded for information 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) Tungi
6. Official Concerned
7. M/File


District Education Officer
8 (Male) Charsadda

ATTES (E)

(9)

ANNEXURE - B

Khyber Pakhtunkhwa Med. No. 4 GS & PD: Khyber Pakhtunkhwa -37 FS-2000 P of 100-29-7-98-(16)

MEDICAL CERTIFICATE

Name of Official Mr Ashfaq Hussain

Caste or race Afghan

Father's /Husband Name Sadiq Hussain

Residence Village Khory Plo Chaggi Dist. Chitral

Date of birth 24-4-1986

Exact height by measurement 5' 5"

Personal mark of identification 17101-9653316-5

Signature of the Official [Signature]

Signature of head of office _____

Seal of Office _____

I do hereby certify that I have examined Mr. Ashfaq Hussain a candidate for employment in the office of the Education Dept. Chitral and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nil

I do not consider this as disqualification for employment in the office of the

His age according to his own statement is 28 years

and by appearance about Twenty eight years.



HAND THUMB AND FINGER IMPRESSIONS

[Signature]
Medical Superintendent
DHQ Hospital Charsadda
Medical Superintendent
D.H.Q. Hospital Charsadda

[Signature]
3/12/04

[Signature]

ATTESTED

HEAD MASTER
GPS HIGHER SECONDARY SCHOOL
GUMMALI

خارجی نوٹ
[Signature]

خارجی نوٹ
[Signature]

میں نے اپنے اساتذہ کرام سے اس بات پر اتفاق کیا ہے کہ
ان کے پاس اس وقت اساتذہ کرام کی فہرست ہے۔
اساتذہ کرام کی فہرست اساتذہ کرام کے پاس ہے۔
اساتذہ کرام کی فہرست اساتذہ کرام کے پاس ہے۔
اساتذہ کرام کی فہرست اساتذہ کرام کے پاس ہے۔

خارجی نوٹ

Dated 3/12/14

10



OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) CHARSAKDA

OFFICE ORDER

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of PST, School based in BPS-12 (Rs: 9055-650-28555) @Rs: 9055/= fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect.

PST BPS-12

S.No	Name	Father Name	CNIC	Score	U/Council	School
1	Umar Farooq	Nawroz Khan	17102-5352601-9	137.65	Abazai	GPS Ziarat Killi
2	Naseer Ullah	Aman Ullah	17102-7866217-1	124.88	Abazai	GPS Izat Khan Killi
3	Muhammad Ibrahim	Nowsher Khan	17102-5987226-5	122.97	Abazai	GPS Asilo Killi
4	Muhammad Zeeshan	Amin Jan	17102-5293315-1	118.2	Abazai	GPS Janokai
5	Shah Pur Khan	Ajoon Khan	17102-8324348-3	117.66	Abazai	GPS Ziarat Killi
6	Benyamin	Khaista Gul	17102-8797330-5	116.45	Abazai	GPS Muslim Abad
7	Asad Ullah	Zahid Gul	17102-3330254-1	115.29	Abazai	GPS Dherai Killi
8	Muhammad Wisal	Ajmal Khan	17102-0787067-3	115.19	Abazai	GPS Shoukat Abad No.1
9	Amad Ashiq	Muhammad Ashiq	17102-5656162-9	109.78	Abazai	GPS Janokai
10	Fazli Amin	H. Amir Khan	17101-5522476-7	122.81	Agra	GPS Ceedar
11	Hasnain Shah	Hasan Shah	17101-0591138-5	110.08	Agra	GPS Shahara No.1
12	Mian Muhammad Tawab	Mian Fazli Tawab	17101-3019524-9	104.31	Agra	GPS Kotai
13	Farhad Ali	Murad Ali	17101-3213317-5	122.49	Battagram	GPS Aladad Kher Karkani

ATTESTED

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12

S.No	Name	Father Name	CNIC	Score	U/Council	School
126	Fazli Amin	Zaman Khan	17101-7980089-3	98.68	Panjpao	GPS Dalazak No.2
127	Sadiq Hussain	Shakir Ullah	17101-8035360-1	98.39	Panjpao	GPS Dalazak No.2
128	Asghar Khan	Munir Khan	17101-0410236-7	98.17	Panjpao	GPS Khwaja Hawas
129	Haroon Ur Rashid	Noor Habib	17101-3126105-3	97.23	Panjpao	GPS Khwaja Hawas
130	Abdullah	Ali Bas Khan	17101-0310354-9	96.60	Panjpao	GPS Dalazak No.1
131	Haris Ali	Gul Qaish	17101-0396945-1	95.02	Panjpao	GPS Dalazak No.1
132	Asif Jan	Muhammad Ali	17101-3749607-3	127.23	Rajjar-I	GPS Sulai Kamar
133	Abdul Mateen	Muhammad Khan	17101-9407340-5	126.95	Rajjar-I	GPS Rajjar No.2
134	Farooq Shah	Feroz Khan	17101-0472041-5	125.42	Rajjar-I	GPS Rajjar No.2
135	Alamzeb	Muhammad Shah	17101-7061680-3	123.37	Rajjar-II	GPS Shakardhand
136	Wahid Ullah	Saeed Ullah	17101-2646202-9	125.85	Sarki Titara	GPS Munshyano Killi
137	Muhammad Ali	Muhammad Amin	17101-3010799-5	124.64	Sarki Titara	GPS Munshyano Killi
138	Ishfaq Hussain	Sadiq Hussain	17101-9653316-5	115.67	Sarki Titara	GPS Palai Pul
139	Tauseef Elahi	Fazli Rabbi	17101-9606444-3	114.80	Sarki Titara	GPS Anwar Killi No.2
140	Jamil Ahmad	Muhammad Jamal	17101-0312899-3	131.75	Sheikho	GPS Sheikho
141	Bashir Ahmad	Muhammad Jamal	17101-9125050-1	120.46	Sheikho	GPS Sheikho

ATK

(13)

S.No	Name	Father Name	CNIC	Score	U/Council	School
158	Muhammad Binyamin	Muhammad	17101-2319418-3	118.53	Turangzai	CPS Turangzai No.1
159	Atta Ullah	Nasr Ullah Jan	17101-8461318-1	121.66	Umarzai	CPS Gul Khitab
160	Tahreer Ullah	Sanobar Khan	17102-8475349-9	121.40	Umarzai	CPS Nishan Abad
161	Mahfooz Ur Rahman	Inayat Ur Rahman	17101-0400287-5	131.28	Utmanzai	CPS Utmanzai No.1
162	Muhammahd Mubashir	Gul Muhammad Khan	17101-9739117-7	130.67	Utmanzai	CPS Katigan
163	Asmat Ali	Bahadar Khan	17102-1142576-7	134.53	Zim	CPS Zuhrah Gul No.1

TERMS & CONDITIONS.

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

Handwritten signature and date: 20/9/16

Handwritten signature and stamp: ATTACHED

14

14. Before handing over charges once again their document may be checked. If they have not the required qualification, they may not be handed over charge.


(Sharif Gul)
District Education Officer
(Male) Charsadda

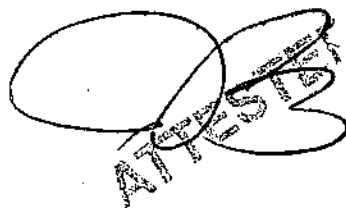
Endst: No: 15678-847 Dated: Charsadda the 26/03 /2016

Copy forwarded for information and necessary action to the: -

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




Dy: District Education Officer
8 (Male) Charsadda
26/3/16



ATTACHED



CHANDRA
ADDITIONAL DISTRICT JUDGE
Dhaka
Signature

HEAD MASTER
GPS (Khan, Anwarul)

Yours Sincerely,
Lajpat Hussain PST, GPS Agara
Koron Utmanza

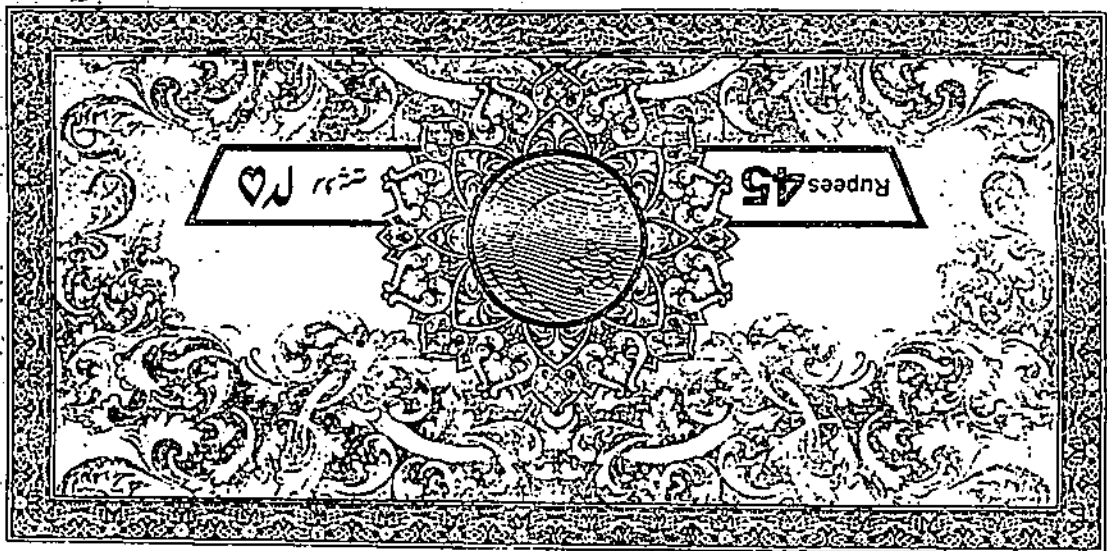
Date: 28/3/2018

Respected Sir,
The applicant had been appointed for the post of PST
w/o of dec 03, 2014 through court order. Now a review
case is in progress against the applicant in Supreme
Court of Pakistan. So the applicant appeared in the
NTS for PST in 2015-16 and appointed as PST again.
Therefore, it is requested you to accept his
resignation from PST post etc.
Thanks

Chansada
Subject: Resignation from Service (PST 2018)

The DCO make,

To



468300

ANNEXURE-

15

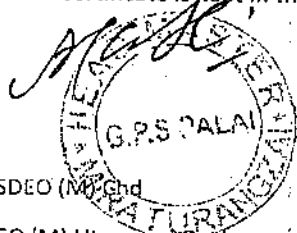
16

CHARGE REPORT

Upon the office order of DEO (M) Charsadda vide no. 15678-847, dated: 26/03/2016, Mr. Ishfaq Hussain S/O Sadiq Hussain took his charge on 28/03/2016 at GPS PALAY PULL Turangzai.

The above mentioned certificate is kept in the school all record as will.

Gave charge
Signature of:



Received charge
signature of:

A handwritten signature, likely of the receiver, written in black ink.

Information to:

1. Copy to SDEO (M) Chd
Copy to ASDEO (M) Utmanza Circle

ATTESTED

17

ANNEXURE E

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

NOTIFICATION

In pursuance of The Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) and Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. SO (S/F/E & SED/3-2/ 2018 / SITT /Contract dated Peshawar the 16/02/2018, services of the following (433) Primary School Teachers appointed through NTS on Adhoc basis on Contract w.e.f (31-05-2014 to 15-07-2017), are hereby regularized in BPS-12, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment as metioned against each in the interest of public service.

Table with 10 columns: Sr, Roll No. NTS, Name and Father Name, CNIC No, Name of School, Total Marks out of 200, W/C, Appointment order No. & Date, Date of taking Over Charge, Pension No. & Date. It lists 25 teachers and their details.

Scanned with CamScanner

290	201700672	Samiullah S/O Amanullah	17102-9394848-63	GPS Mian Sab	104.4	Panjpoo	15678-847 Dated:26/03/2016	28-03-16
291	201700480	Masih Ullah S/O Israr Ali	17102-9394848-64	GPS Shahbaz Khan	103.5	Panjpoo	15678-847 Dated:26/03/2016	28-03-16
292	201700663	Fazal Amin S/O Zaman Khan	17102-9394848-65	GPS Dalazak No.2	98.68	Panjpoo	15678-847 Dated:26/03/2016	28-03-16
293	201700577	Sadiq Hussain S/O Shakir Ullah	17102-9394848-66	GPS Dalazak No.2	98.39	Panjpoo	15678-847 Dated:26/03/2016	28-03-16
294	202300435	Asghar Khan S/O Munir Khan	17102-9394848-67	GPS Khwaja Hawas	98.17	Panjpoo	15678-847 Dated:26/03/2016	29-03-16
295	202300332	Haroon Ur Rashid S/O Noor Habib	17102-9394848-68	GPS Khwaja Hawas	97.23	Panjpoo	15678-847 Dated:26/03/2016	29-03-16
296	201700775	Abdullah S/O Ali Bat Khan	17102-9394848-69	GPS Dalazak No.1	95.6	Panjpoo	15678-847 Dated:26/03/2016	28-03-16
297	201700686	Haris Ali S/O Gul Qaish	17102-9394848-70	GPS Dalazak No.2	95.01	Panjpoo	15678-847 Dated:26/03/2016	29-03-16
298	202300462	Asif Jan S/O Muhammad Ali	17102-9394848-71	GPS Sulai Kamar	127.21	Rajjar-I	15678-847 Dated:26/03/2016	28-03-16
299	201700749	Farooq Shah S/O Feroz Khan	17102-9394848-72	GPS Rajjar No 2	125.42	Rajjar-I	15678-847 Dated:26/03/2016	28-03-16
300	201700557	Alam Zeb S/O Muhammad Shah	17102-9394848-73	GPS Shakarband	123.37	Rajjar-II	15678-847 Dated:26/03/2016	28-03-16
301	201700748	Wahed Ullah S/O Saeed Ullah	17102-9394848-74	GPS Munshyano Killi	125.85	Sarki Titara	15678-847 Dated:26/03/2016	28-03-16
302	202300505	Muhammad Ali S/O Muhammad Amin	17102-9394848-75	GPS Munshyano Killi	124.64	Sarki Titara	15678-847 Dated:26/03/2016	28-03-16
303	202200109	Ishaq Hussain S/O Sadiq Hussain	17102-9394848-76	GPS Palal Pul	115.67	Sarki Titara	15678-847 Dated:26/03/2016	28-03-16
304	201700475	Tauseef Ishaq S/O Fazil Rabbi	17102-9394848-77	GPS Ijara Kor	114.8	Sarki Titara	15678-847 Dated:26/03/2016	28-03-16
305	201700658	Jamil Ahmad S/O Muhammad Jamil	17102-9394848-78	GPS Shelkho	131.75	Shelkho	15678-847 Dated:26/03/2016	28-03-16
306	202100427	Dashir Ahmad S/O Muhammad Jamal	17102-9394848-79	GPS Shelkho	120.46	Shelkho	15678-847 Dated:26/03/2016	28-03-16
307	202400412	Abad Ur Rahman S/O Hedayat Ur Rehman	17102-9394848-80	GPS Ghazal	128.85	Sherpoo	15678-847 Dated:26/03/2016	28-03-16
308	202100463	Naorem Khan S/O Muhammad Gul	17102-9394848-81	GPS Aomin Abad	113.89	Sherpoo	15678-847 Dated:26/03/2016	28-03-16
309	601700938	Jawad Ali S/O Salfar Ali	17102-9394848-82	GPS Ghazal	112.74	Sherpoo	15678-847 Dated:26/03/2016	28-03-16
310	202200471	Imran Ul Haq S/O Hazrat Muhammad	17102-9394848-83	GPS Ghazal	110.51	Sherpoo	15678-847 Dated:26/03/2016	28-03-16
311	201700664	Aadi Tanveer Ahmad S/O Muhammad Israil	17102-9394848-84	GPS Moaj Khel	104.17	Sherpoo	15678-847 Dated:26/03/2016	28-03-16
312	202600284	Ahmad Ali S/O Bahramand Khan	17102-9394848-85	GPS Masa Khel	100.84	Sherpoo	15678-847 Dated:26/03/2016	28-03-16
313	201700736	Ishad Ali S/O Shaikat Ali	17102-9394848-86	GPS Peran	130.23	Shodag	15678-847 Dated:26/03/2016	28-03-16
314	602100690	Ahmad Ali S/O Sher Zaman	17102-9394848-87	GPS Chall	122.73	Shodag	15678-847 Dated:26/03/2016	28-03-16
315	202300493	Jamal Shah S/O Feroz Shah	17102-9394848-88	GPS Chall	118.13	Shodag	15678-847 Dated:26/03/2016	28-03-16
316	202300468	Nusrat Ali Shah S/O Arzala Khan	17102-9394848-89	GPS Haldar Killi	117.54	Shodag	15678-847 Dated:26/03/2016	28-03-16
317	201700759	Alamgir Adil S/O Sultan Muhammad	17102-9394848-90	GPS Merghan	116	Shodag	15678-847 Dated:26/03/2016	28-03-16
318	202200482	Shaukat Ullah S/O Muhammad Ibrahim	17102-9394848-91	GPS Ajoon Killi	115.58	Shodag	15678-847 Dated:26/03/2016	28-03-16
319	201700611	Habib Ullah S/O Muhebbat Shah	17102-9394848-92	GPS Tarnab No.1	129.21	Tarnab	15678-847 Dated:26/03/2016	28-03-16
320	201700623	Abdul Bari S/O Fazil Rabbi	17102-9394848-93	GPS Tarnab No.2	118.43	Tarnab	15678-847 Dated:26/03/2016	28-03-16
321	201700621	Usman Khan S/O Wasal Khan	17102-9394848-94	GPS Tarnab No.2	116.57	Tarnab	15678-847 Dated:26/03/2016	28-03-16
322	601700841	Muhammad Binayamin S/O Muhammad	17102-9394848-95	GPS Turangtal No.1	118.53	Turangtal	15678-847 Dated:26/03/2016	02-04-16

(Handwritten Signature)

422	2031001233	Sayul Khan S/O Aij Akbar	17102-9394848-195	GPS So/ma1 Tangi	116.56	Shodag	20761-856	Dated:28/03/2017	08-04-17
423	2035001449	Nadeem Jan S/O Khan Bahader	17102-9394848-196	GPS Tarnab No.2	112.6	Tarnab	20761-856	Dated:28/03/2017	08-04-17
424	2031001203	Muhammad Ali S/O Zahir Ullah Khan	17102-9394848-197	GPS Tarnab No.1	111.76	Tarnab	20761-856	Dated:28/03/2017	08-04-17
425	2035001107	Mozhar Ali S/O Istikhhar Ali	17102-9394848-198	GPS Umarzal No.1	124.95	Umarzal	20761-856	Dated:28/03/2017	08-04-17
426	201701971	Muhammad Zohaib S/O Muhammad Yousof	17102-9394848-199	GPS Dheri Zardad No.1	112.95	Dheri Zardad	20761-856	Dated:28/03/2017	08-04-17
427	2032001161	Abdul Majid S/O Abdul Bari	17102-9394848-200	GPS Mubeen Korpora SKF	126	Hassanzai	27482-71	Dated:20/05/2017	22-05-17
428	2017000247	Irfan Ullah S/O Yousof Gul Mujeeb Ur Rehman	17102-9394848-201	GPS No.1 Tangi	120.24	M/C- Tangi	27482-71	Dated:20/05/2017	22-05-17
429	2017000286	(Disable Quota) S/O Zahid Ullah	17102-9394848-202	GPS No.1 Charsadda	121.32	M/C-III Charsadda	27482-71	Dated:20/05/2017	22-05-17
430	202300325	Hazrat Ullah S/O Alamzaid	17102-9394848-203	GPS Arat Killi	106.74	Kotlahram Dheri	27530-34	Dated:23/05/2017	01-09-17
431	2033001129	Asif Ur Rehman (Disable Quota) S/O Gul Rehman	17102-9394848-204	GPS Dhakki	121.59	Dhakki	27547-53	Dated:23/05/2017	01-09-17
432	201700483	Syed Wilayat Shah S/O Syed Fazeh Sior Shah	17102-9394848-205	GPS Haldar Killi	105.50	Shodag	28871-76	Dated:15/07/2017	01-09-17
433	2031000953	Yahya Jan S/O Dilbar Khan	17102-9394848-206	GPS Mahmood Abad	121.61	Chindrodig	28877-80	Dated:15/07/2017	01-09-17

TERMS & CONDITIONS.

- 1.) Their services shall be governed by the Khyber Pakhtunkhwa Civil servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011 and such rules & regulations as may be issued from time to time by the Government.
- 2.) Their services shall be considered regular and they shall be eligible for pension / deduction of GPFund in terms of the Khyber Pakhtunkhwa Civil Servants Act, 1973 as amended in 2013.
- 3.) Their services are liable to termination on one months' notice from either side in case of resignation without notice, their one month's pay/allowances shall be forfeited to the Govt.
- 4.) They shall possess the same qualification and experience required for a regular post.
- 5.) Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
- 6.) The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resign / terminated from service and also not for those who are under disciplinary proceedings.
- 7.) Their pay shall be released subject to verification of academic documents/testimonial from the concerned Board/University by the SDEO concerned.
- 8.) The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
- 9.) The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre.
- 10.) Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.

(SIRAJ MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

Encl: No: 19747-20188 F.NO. (Regularization PST 2018) Dated: 12 / 03 / 2018

- Copy forwarded for information to the:-
1. Director E&SE Deptt. Khyber Pakhtunkhwa Peshawar.
 2. District Nazim Charsadda
 3. Deputy Commissioner Charsadda
 4. District Monitoring Officer IMU Charsadda
 5. SDEO (M) Charsadda
 6. SDEO (M) Tangi
 7. SDEO (M) Shabqadar
 8. District Account Officer Charsadda
 9. Official concerned.
 10. Office file

Dy: DISTRICT EDUCATION OFFICER
(MALE) CHARSADDA

20

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) ABBOTTABAD.



☎ 0992-9310102, 0992-330131
 @ education@abbottabad.gov.pk

GRANT OF PAY PROTECTION.

In pursuance of Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No. SO(S) F/E&SED/3-2/2018/SST/Contract dated 16-02-2018 and Govt. of Finance Department Circular No. FD/(SOR-1) 12-7/2014 dated 06-02-2014 read with rule FR-22 (b) and in the light of Notification issued by the Director E&SED Khyber Pakhtunkhwa Peshawar vide No.6842-6942/F.No.14/SST (M) Pay Protection dated 25-01-2019 Pay Protection towards their post/Previous service rendered in respect of following SSTs is hereby allowed subject to the condition that there is no break/interruption between their previous & current regular service under Rule FR-23.

S. No.	Name/Designation/School.	1st Appointment as	Date of Appointment as	Allowed Pay Protection w.e. from.
1.	Mr. Shaifque Hussain Shah SST (B/C) GHS Bandi Drundar Abbottabad.	SST (B/C) vide Endst: No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst: No. 2059-64 dated 25-07-2017.	01-12-2015
2.	Mr. Muhammad Nisar SST (B/C) GHS Bakor Abbottabad.	IST vide Endst: No. 7579-7686 dated 15-10-2014.	SST (B/C) Vide Endst: No. 4272-78 dated 25-04-2017.	16-10-2014
3.	Mr. Mubeer-ul-Haq SST (M/P) GHSS Nawanshehr Abbottabad	CT Vide Endst: No. 2907-12 dated 05-05-2014.	SST (M/P) Vide Endst: No. 4272-78 dated 25-04-2017.	06-05-2014
4.	Mr. Wasim Khan SST (B/C) GHSS Nawanshehr Abbottabad.	SST (B/C) vide Endst: No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst: No. 4272-78 dated 25-04-2017.	01-12-2015
5.	Mr. Muhammad Mohtasim Abul Abbasi SST (M/P) GHS Phallah Abbottabad.	CT Vide Endst: No. 1854-60 dated 14-03-2015.	SST (M/P) Vide Endst: No. 4272-78 dated 25-04-2017.	16-03-2015
6.	Haliz Muhammad Amir Abbasi SST (G) GHS Ghambeer Abbottabad.	AT vide Endst: No.3034-39 dated 10-05-2014.	SST (G) Vide Endst: No. 4272-78 dated 25-04-2017.	12-05-2014
7.	Mr. Muhammad Sajid SST (B/C) GHS No.3 Abbottabad.	SST (B/C) vide Endst: No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst: No. 4272-78 dated 25-04-2017.	01-12-2015
8.	Mr. Umer Farooq, SST (B/C) GHS Rajoya Abbottabad.	CT Vide Endst: No.1854-60 dated 14-03-2015	SST (B/C) Vide Endst: No. 4272-78 dated 25-04-2017.	16-03-2015
9.	Mr. Zaun Akhtar, SST (M/P) GHS Rajoya Abbottabad.	SST (M/P) vide Endst: No.3919-25 dated 30-11-2015	SST (M/P) Vide Endst: No. 4272-78 dated 25-04-2017.	07-12-2015
10.	Mr. Waqar Gul, SST (G) GHS Sumandar Katha A/Abad.	CT Vide Endst: No. 2907-12 dated 05-05-2014.	SST (G) Vide Endst: No. 4272-78 dated 25-04-2017.	14-05-2014
11.	Chaudary Waqas, SST (B/C) GHSS Mushumbad A/Abad.	SST (B/C) vide Endst: No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst: No. 4272-78 dated 25-04-2017.	01-12-2015
12.	Mr. Muhammad Umer Javed SST (B/C) GHS No.4 Abbottabad	SST (B/C) vide Endst: No.3919-25 dated 30-11-2015	SST (B/C) Vide Endst: No. 4272-78 dated 25-04-2017.	01-12-2015

**DISTRICT EDUCATION OFFICER (M)
 ABBOTTABAD.**

Endst. No. 5154-56 /E&SSTs/Pay Protection

Dated 19-08-2020

Copy forwarded for information & necessary action to:-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Accounts Officer, Abbottabad.
3. The Principals/Headmasters of concerned GHSS/GHS.

[Signature]
 District Education Officer
 Abbottabad

[Signature]

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Dist. Govt. KP-Provincial
District Accounts Office Charsadda
Monthly Salary Statement (May-2024)



Personal Information of Mr ISHFAQ HUSSAIN d/w/s of SADIQ HUSSAIN

Personnel Number: 00740937 CNIC: 1710196533165 NTN:
Date of Birth: 24.04.1986 Entry into Govt. Service: 03.12.2014 Length of Service: 09 Years 05 Months 030 Days

Employment Category: Vocational Permanent

Designation: SENIOR PRIMARY SCHOOL TEA 80001042-DISTRICT GOVERNMENT KHYBE
DDO Code: CA6012-DEPUTY DISTRICT OFFICER (MALE) PRIM EDUCATION CHARSADDA (REGULAR)
Payroll Section: 001 GPF Section: 001 Cash Center: 05
GPF A/C No: V.48CP.P.21 GPF Interest applied GPF Balance: 203,758.00 (provisional)
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 14 Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	34,710.00	1001	House Rent Allowance 45%	3,321.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	350.00	2199	Adhoc Relief Allow @10%	226.00
2316	Teaching Allowance 2021	3,036.00	2341	Dispr. Red All 15% 2022KP	3,060.00
2347	Adhoc Rel Al 15% 22(PS17)	3,060.00	2378	Adhoc Relief All 2023 35%	10,923.00
5801	Adj Basic Pay	8,700.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3014	GPF Subscription	-3,900.00	3501	Benevolent Fund	-1,200.00
3543	Professional Tax	-1,200.00	3609	Income Tax	-459.00
3990	Emp.Edu. Fund KPK	-135.00	4004	R. Benefits & Death Comp:	-600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	200,000.00	-6,000.00	140,000.00

Deductions - Income Tax

Payable: 3,795.89 Recovered till MAY-2024: 2,660.00 Exempted: 894.49 Recoverable: 241.40

Gross Pay (Rs.): 71,742.00 Deductions: (Rs.): -13,494.00 Net Pay: (Rs.): 58,248.00

Payee Name: ISHFAQ HUSSAIN
Account Number: 15611
Bank Details: THE BANK OF KHYBER, 080020 MAIN BAZAR CHARSADDA MAIN BAZAR CHARSADDA, Charsadda

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:
City: Domicile: - Housing Status: UNKNOWN
Temp. Address:
City: Email: ishfaqas@gmail.com

ATTEST

System generated document in accordance with APPM 4.6.12.9(834921/27.05.2024/v3.0)
* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/04.06.2024/01:46:13)

22

ANNEXURE - F

To

The District Education Officer,
(Male) Charsadda.

SUBJECT: Pay protection/Counting of previous Service.


R/sir,

With profound regards it is stated that I am serving as SPST BPS-14 at GPS Sarfaraz Killi Charsadda, I was appointed as PST BPS-12 dated 03-12-2014 on UC based policy. Then I was re-appointed on the same post (PST BPS-12) through NTS on adhoc UC based policy dated 26-03-2016. There is no any gap/break in my service since my first appointment.

As per Notification of DEO (M) Dir Upper No.7293-47 dated 29-03-2022 and the judgment of the Honorable Service Tribunal Peshawar Order dated 27-11-2023 in response to service Appeal No.7364/2021 (copy attached).

You are therefore requested to that my case may kindly be treated in the light of the above mentioned judgment, please.

Dated: 12-02-2024


ATTEST

Ishfaq Hussain

SPST GPS Sarfaraz Killi
Charsadda

12/02/2024



AnyScanner

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OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
(MALE) CHARSADDA

sdeocharsadda@gmail.com

Ph. 091-9220487

No. 135 Dated 12 / 02 / 2024

To:

The District Education Officer
(Male) Charsadda

SUBJECT: APPLICATION FOR PAY PROTECTION /COUNTING OF PREVIOUS SERVICE

Memo:-

Enclose please find herewith an original application along with other connected documents in r/o Mr. Ishfaq Hussain SPST GPS Sarfaraz Killi Charsadda is hereby submitted for further process please.

SUB DIVISIONAL EDUCATION OFFICER
(M) CHARSADDA

No: _____ Dated 1 / _____ / 2024

Copy for information: -

- 1. ASDEO Circle Concerned.
- 2. Official Concerned.
- 3. Office File

SUB DIVISIONAL EDUCATION OFFICER
(M) CHARSADDA

ATTEST

(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2024

ISHFAQ HUSSAIN

V/S

DEO (M) CHD

I, Ishfaq Hussain 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 10th day of June 2024.

EXECUTANT


(Ishfaq Hussain)

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: **TF-291, 292**, Deans Trade Centre, Peshawar Cantt.:
0333-9313113, 0314-9965666