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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

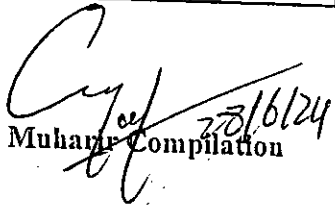
EXECUTION NO _____

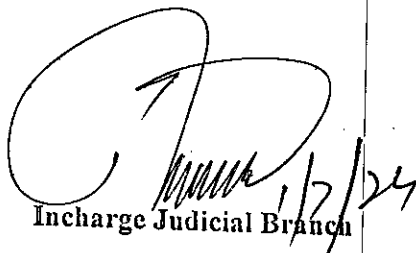
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ZAKOR ALAM vs EDUCATION

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 Muharrir Compilation
 28/6/24


 Incharge Judicial Branch
 1/7/24

SST (IT) Promotion order

17	Aftab Alam GHSS Guibat Kohat	19/2/1982	Kohat	10/2/300	GHSS Nasrat Khel Kohat	do
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Terms and conditions:-

- They would be on probation for a period of one year extendable for another one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- Charge report should be submitted to all concerned.
- Their Inter-Seniority on lower post will remain intact.
- No TA/DA is allowed for joining his duty.
- They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he/she is wrongfully promoted he/she will be reversed.
- Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Encls: No 724 S/ Fie No 03/ Promotion to SST (IT) B-16

Dated Peshawar the 28-05-2019

Copy forwarded for information and necessary action to the:
Accountant General Khyber Pakhtunkhwa Peshawar

- District Education Officer (M) concerned
- District Accounts Officer concerned
- Section Officer (Primary) E&SE Department, Peshawar
- Principals concerned
- Official Concerned
- PS to the Secretary to Govt Khyber Pakhtunkhwa E&SE Department
- PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
- M/ File

Assisted

Assistant Director (Lithani)
E&SE Department
Khyber Pakhtunkhwa Peshawar

[Signature]
By: Director (P. Govt)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

[Signature]

1

28.03.2024. 1. Junior to learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney for the respondents present.

2. File to come up alongwith connected service appeal No. 930/2020 on 04.06.2024 before D.B at camp court, Swat. P0.P given to parties.

SCANNED
KPST
Peshawar

Kaleemullah

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

AS per instruction of my client doesn't want to raise the instant appeal my kindly be with draw
04th June 2024
Umar Farooq
9/6/2024

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

2. Learned counsel for the appellant requested for withdrawal of the instant service appeal. As a token of admission of his submission, he signed he margin of order sheet. Dismissed as withdrawn. Consign.

3. Pronounced in open court at camp court Swat and given under our hand and seal of the Tribunal on this 04th June, 2024.

(Muhammad Akbar Khan)
Member (E)
Camp Court Swat

(Rashida Bano)
Member (J)
Camp Court Swat

SCANNED
KPST
Peshawar

2

4th August, 2023 1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General alongwith Syed Alamzeb Shah, ADO (Lit) for the respondents present.

2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 04.12.2023 before the D.B. PP given to the parties.

(Fareeha Paul)
Member (E)

(Rashida Bano)
Member (J)

*Kaleemullah

04.12.2023

Learned counsel for the appellant present. Syed Alamzeb Shah, ADEO alongwith Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the appellant again requested for further time for preparation of arguments. Adjourned. To come up for arguments on 28.03.2024 before the D.B. Parcha Peshi given to the parties.

(Fareeha Paul)
Member (E)

(Salah-ud-Din)
Member (J)

Naeem Amin

SCANNED
KFST
Peshawar

SCANNED
KFST
Peshawar

3

09th March, 2023

Junior of learned counsel for the appellant present.
Mr. Muhammad Riaz Khan Pindakhel, Assistant Advocate
General alongwith Mr. Gohar Ali, Assistant for the respondents
present.

Junior of learned counsel for the appellant seeks
adjournment on the ground that learned counsel for the
appellant has proceeded to his native village due to some
domestic engagement. Adjourned. To come up for arguments
on 18.05.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

(Salah-ud-Din)
Member (J)

(Kalim Arshad Khan)
Chairman

18.05.2023

Junior of learned counsel for the appellant present. Syed
Alamzeb Shah, ADEO alongwith Mr. Asad Ali Khan, Assistant
Advocate General for the respondents present.

SCANNED
KPST
Peshawar

File to come up for alongwith connected Service Appeal No.
930/2020 on 04.08.2023 before D.B. Parcha Peshi given to the
parties.

(Muhammad Akbar Khan)
Member (E)


(Salah-ud-Din)
Member (J)

9

3rd Nov. 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.


Learned counsel for the appellant seeks adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 16.12.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

16th Dec. 2022

Counsel for the appellant present. Mr. Naseerud Din Shah, Assistant Advocate General for the respondents present. Mrs. Rozina Rehman, learned Member (J) is on leave, therefore, D.B is incomplete. The case is adjourned to 09.03.2023 for arguments before the D.B.



(Fareeha Paul)
Member(E)

SCANNED
KPST
Peshawar

5

27.11.2021

Proper D.B. is not available, therefore, case is adjourned to 3-3-2022 for the same.


READER


3-3-22

Due to retirement of the Hon.ble chairman the case is adjourned on 14-6-22
*Sp. Adv.
Reader*

14.06.2022

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present. Syed Alamzeb Shah, Legal Advisor for respondents No. 4 present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned. To come up for arguments before the D.B on 16.08.2022.




(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

16.8.22

due to summer vacation the case is adjourned to 3.11.2022 for the same.


6

P.S

28.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.


Chairman

08:03.2021

Junior to counsel for the appellant present. Addl: AG
for respondents present.

Written reply not submitted. Learned Additional
Advocate General seeks time to contact the respondents for
submission of written reply/comments.

Adjourned to 18.05.2021 before S.B.


(Mian Muhammad)
Member (E)

18.05.2021

Due to demise of the Worthy Chairman, the Tribunal is
non-functional, therefore, case is adjourned to
05.07.2021 for the same as before.


Reader

05.07.2021

Junior to counsel for the appellant present. Mr.
Adeel Butt, Additional Advocate General alongwith Mr.
Ahmad Hassan, Litigation Officer respondents present.

*Stipulated period has passed
and reply has not been
submitted.*

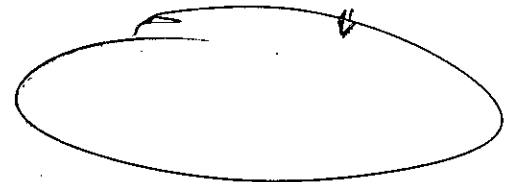
Respondents have not submitted
reply/comments. They are required to submit
reply/comments within 10 days in office, positively. In
case the respondents have not submitted
reply/comments within stipulated time, office shall put
up the appeal with a report of non-compliance. To
come up for arguments on 24.11.2021 before D.B.


Chairman

8

25.09.2020

Mr. Mir Zaman Safi, Advocate, for appellant is present. He submitted that issue involved in the instant service appeal is identical as involved in other five numbers of appeals one of which captioned Rahatullah Versus Education Department in which next date of hearing has been fixed as 06.10.2020 has been fixed, therefore, he requested that the instant appeal has to be fixed on that very date. Request is appropriate, propriety demands that identical issues are tackled simultaneously for avoiding conflicted judgments therefore, adjourned to 06.10.2020 for arguments, to be clubbed with referred to appeal.



(Muhammad Jamal Khan)
Member (Judicial)

06.10.2020

Junior to counsel for the appellant present.

Learned senior counsel for the appellant is not in attendance today due to general strike on the call of Khyber Pakhtunkhwa Bar Council. The matter is adjourned to 08.12.2020 for hearing before S.B.



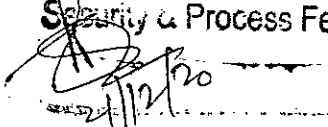
Chairman

08.12.2020

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 08.03.2021 before S.B.

Appellant Deposited
Security & Process Fee



(Rozina Rehman)
Member (J)

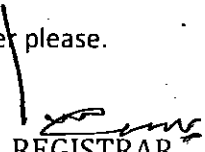

9

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 8871/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	06/08/2020	<p>The appeal of Mr. Zahoor Alam presented today by Mr. Noor Mohammad Khattak 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> <p>2-</p>		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/09/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 8871 /2020

ZAHOOR ALAM

VS

EDUCATION DEPTT:

INDEX

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4	Appointment order	C	8.
6	Medical certificate	D	9.
7	Departmental appeal	E	10.
8	Vakalat nama	11.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

APPEAL NO. 8871 /2019

Diary No. 8291

Dated 6/8/2020

Mr. Zahoor Alam, PST (BPS-12),
GPS Bibyawar, District Dir Upper.....**APPELLANT**

VERSUS

- 1- The Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer, District Dir Upper.

.....**RESPONDENTS**

APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR FIXATION OF PAY IN BPS-12 w.e.f. 30-01-1996 I.E. FROM THE DATE OF INITIAL APPOINTMENT TO THE POST OF PST AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the appellant may kindly be allowed/granted pay fixation w.e.f. 30-01-1996 with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

Filed to-day
Registrar
6/8/2020 1-

- 1- That the appellant was initially appointed in the respondent Department as DM vide order dated 30-01-1996 as stop gap arrangement.(Copy of the appointment order is attached as annexure..... **A)**
- 2- That it is worth mentioning here, that in 1997 the services of the appellant along with others were dispensed with on the ground that their services were no more required to the Department.
- 3- That it is also worth mentioning, that on promulgation of KP Sacked Employee Act, 2012 appellant submitted an application for his re-instatement being covered under the said law but the same was not considered, hence the appellant filed writ petition no.

794/2017 before Peshawar high court Mingora Bench, which was allowed vide judgment dated 22/11/2017 in favor of the appellant. Copy of the judgment is attached as annexure.....**B.**

- 4- That the appellant was appointed as PST w.e. from the date of taking over charge in light of Peshawar high Court Dar-Ul-Qaza Bench judgment vide order dated 27/03/2018. That in response the appellant submitted charge report and started his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order dated and medical certificate are attached as annexure **C & D)**
- 5- That the appellant filed Departmental appeal before respondents for fixation of pay w.e.f. the date of his first appointment i.e. 30/01/1996 but the same has not been responded within stipulated period of ninety days. Copy of departmental appeal is attached as annexure..... **E)**
- 6- That feeling aggrieved and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

GROUND:

- A- That the inaction of respondents by not allowing pay fixation to the appellant w.e.f. 30-01-1996 is against the law, facts, norms of natural justice and materials on the record.
- 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 arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. 30-01-1996 and as such the inaction of the respondents is violative of law and rules.
- D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.
- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitled for the grant of pay fixation w.e.f. the date of initial appointment.
- F- That promulgation of Sacked Employee Act, 2012 established that dismissal of appellant along with others from services was against the

law, hence the appellant is entitled to pay fixation from date of his first appointment.

G- That in light of Rule 2.3 of the West Pakistan, Pension Rules, 1963 the appellant is fully entitle for the grant of pay fixation from the date of initial appointment.

H- 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.

APPELLANT

ZAHOOOR ALAM

THOROUGH:

NOOR MOHAMMAD KHATTA

KAMRAN KHAN

&

**MIR ZAMAN SAFI
ADVOCATES**

19
BETTER COPY

DIVL: DIRECTORATE EDUCATION(S)
MALAKAND DIVISION AT GULKADA, SWAT

APPOINTMENT ORDER:

Consequent upon the direction of Nawab Zada Khwaja Mohammad Khan Hoti, the Minister for Education (Schools) Secy: Colleges NWFP, Peshawar communicated vide his order No. 4534-45/PS/MIN/EDU dated Peshawar the 13/6/1995 and his explicit approval conveyed vide his office memo No. _____/Personnel telephone dated _____ and on the recommendation of Mr. Sahib Zada Tariq Ullah/MPA/Minister/Parliamentary Secretary Mr. Zahoor Alam /Qualification FA S/O Muintaz Khan resident of Bibywar District Dir Upper is hereby appointed purely on adhoc and temporary basis as stopgap arrangements against the vacant post of DM Rs. 1605/- Plus usual allowances as admissible under the rules at government High School Katan Bala District Dir with effect from _____ subject to the Government prescribed terms and condition.

Endst: 13463-96/ dated 30.01.1996

APPOINTMENT ORDER.

Consequent upon the direction of Mr. Zada Khwaja Mohd Khan Hoti, the Minister for Education (Schools) Secy: & Colleges, NWFP, Peshawar, communicated vide his order No. 4534-45/PS/MIN/EDU, dated Peshawar the 13/6/1995 and his explicit approval conveyed vide his office memo No. _____ / Personal telephone dated _____ and on the recommendation of Mr. Sahib Zada Tariqullah / MPA/Minister/Parliamentary Secretary Mr. Zahoor Alam / Duplication PA S/O, Minister, Khann _____ resident of Bihwayar Distt: Swat

A-4

is hereby appointed partly on adhoc and temporary basis on stop-gap arrangements against the vacant post of DM @ Rs. 1605/- plus usual allowances admissible under the rules of government: High School. Kutan Bala District. Dir with effect from _____

subject to the government prescribed terms and conditions.
on the arrival of original incumbent his service will be ceased automatically.

- TERMS AND CONDITIONS.
- 1- He will be governed by such rules and regulations as prescribed by the Government of NWFP from time to time.
 - 2- He will vacate the post on the arrival of the appointment of trained teacher belonging to the same cadre and service and his services will cease automatically.
 - 3- His services are purely temporary and terminable at any time without any notice, and his service will be liable to termination on one month's notice from either side. In case of resignation without notice, one month pay will be forfeited in lieu thereof.
 - 4- He should join the post within a week of this notification, otherwise ~~within~~ this order will be deemed cancelled automatically.
 5. His original certificates/Degrees should be checked and verified from the concerned Board/University immediately by the concerned DSO/Principal/H/M(DDO);
 6. ^{The} Service Book of the teacher must be checked before handing over charge.
 7. He will produce health and age certificate from Medical authority concerned before taking over charge.
 8. His age should not exceed than 25 + 5 = 30 years ^{No} over aged candidates to be given charge.
 9. Charge reports should be submitted to all concerned within stipulated time.
 10. NO TA/DA is allowed,
 11. He will get himself trained /qualified within one year as per rules.

Ghulam Mustafa
DIVL: DIRECTOR OF SECY: EDUCATION(S)
MALAKAND DIVISION AT GULKADA SWAT.

ATTESTED

LEA No. 2.

Endost; No. 13463-96

Dated 30-1/1996

Copy forwarded to the:-

- 1- P.S to Edu; Minister NWFP, Peshawar alongwith his orders.
- 2- District Education officer (11) Distt: 14
- 3- Principal /Headmasters/Headmistress Govt; 11/11 School. Kattan Bata
- 4- P.S to Mr, MPA/Minster/Parliamentary secretary NWFP, Peshawar for information.
- 5- Candidate concerned.
- 6- ADEO, Local office for consolidation of address-record for post-checking.

M. N. N. N.
DDS/EDW.

DIVL: DIRECTOR OF SECONDARY EDUCATION(S)
MALAKAND DIVISION AT GULKADA SWAT

2/c



appropriate order, with reasons, within a month, under
intimation to the Additional Registrar of this Bench. In case,
no such application has been received from the petitioner,
even in that case, respondent No.3 shall inform the
Additional Registrar within a week, so that the petitioner can
avail the remedy available to him under the law.

3. The writ petition is, accordingly, disposed of in
the above terms.

Announced
14.11.2017

S.No. 6156
Name of Applicant S. M. Khan
Date of Presentation of Application 5.11.17
Date of Completion of Copies 16.11.17
No of Copies 3
Urgent Fee ---
Fee Charged ---
Date of Delivery of Copies 16.11.17

Certified to be true copy

[Signature]
EXAMINER
Peshawar High Court, Muzra/Dar-ul-Qaza, Swat
Authorized Under Article 21 of Constitution of Pakistan
10/17



(19)

C (B) (S)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Dir Upper (Phone # 0944-884100) E-mail: deomdirupper@gmail.com

OFFICE ORDER:

In the light of the judgment passed by the Honorable Peshawar High Court Mingora Bench (Darul Qaza Swat) in Writ Petition-No. 794-M/2017 dated 14/11/2017 and 700-M/2017 dated 22/11/2017 in pursuance of sacked employees Act (Appointment) 2012 @ 30% quota, following Sacked employees are hereby ordered against the post of **Drawing Master (Male) BPS-15 (Rs. 16120-1330-56020)** fixed Plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government, in teaching cadre on the terms and conditions given below with effect from the date of taking over charge.

S.No	Name	Father Name	Address & CNIC	Place of Posting	Remarks
1	Ibrahim	Gul Badshah	Wari Dir Upper 15702-5828193-3	GHS Hayagay (Sh)	Appointed under sacked employees quota against VP
2	Zahoor Alam	Mumtaz Khan	Bibywar Dir Upper 15701-8457979-1	GMS Bekaray	--do--

TERMS AND CONDITIONS:

- a) The appointees shall be appointed against 30% share of the available vacancies in district Dir Upper.
- b) As per court decision the appointment will be provide an undertaking that they will complete DM training in the equivalent qualification i.e. BA/BSC, if he has failed in the said condition his appointment shall stand cancelled automatically.
- c) They should obtained medical fitness certificate from the medical superintendent concerned.
- d) The period during which a sacked employee remain dismiss removed or terminated from service, till the date of their appointment shall be deemed his age to has been automatically relaxed and his no further relaxation under any rules for the time being in force.
- e) The sacked employees shall not be entitled to make any claim of seniority, promotion or other back benefits and their appointment shall be considered as fresh appointment.
- f) The appointment will be governed by such Rules, regulations policies, which may be prescribed by the Government from time to time.
- g) If the appointees failed to take over charge within 30 days after issuance of this order his appointment will be deemed as automatically canceled.

ATTESTED

[Signature]

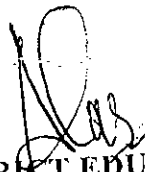
- (6)
- h) Charge reports should be submitted to the concerned.
 - i) Appointment is subject to the condition that his certificates/degrees must be verified from the concerned authorities if anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
 - j) The errors and omissions etc. if found at any stage shall be rectified. In case of termination of said candidate, he will have no right to claim the order already issued in any court.
 - k) Their services shall be terminated at any time, in case of his performance is found unsatisfactory during his probation period. In case misconduct, he will be proceeded under the rules.
 - l) Their appointment subject to the final outcome of the decision of the supreme court of Pakistan.
 - m) No TA/DA is allowed.

(ABDUL HAQ)
DISTRICT EDUCATION OFFICER (M)
DIR UPPER

Endst No. 1746-50 / Sacked Employees/DEO (M)/Estb (S) Dated: 27/03/2018

Copy forwarder for information to the:-

- a) Registrar Honorable Peshawar High Court Mingora Branch.
- b) Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- c) District Accounts Officer Dir Upper.
- d) Principal/Head master concerned school.
- e) Official concerned.


DISTRICT EDUCATION OFFICER (M)
DIR UPPER

20



MEDICAL CERTIFICATE

Name of Official: Salvador M. ...
 Cast or race: Mixed
 Father's Name: Nicolas ...
 Residence: Village, S. ...
 Date of Birth: 20.1.1911 (Tuesday)
 Exact height by measurement: ...
 Personal mark of identification: ...
 Signature of the official: [Signature]
 Signature of head of office: ...

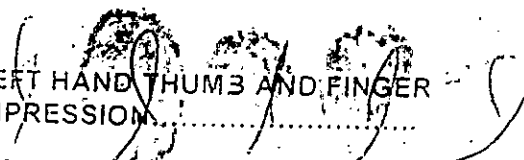
Teak over check on official

Seal of Office

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

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

LEFT HAND THUMB AND FINGER IMPRESSION



Medical Superintendent Civil Hospital

ATTESTED

To,

The Director, E&SE Department,
Khyber Pakhtunkhwa, Peshawar

**DEPARTMENTAL APPEAL FOR FIXATION OF PAY IN
BPS-12 W.E.F 30.11.1995 I.E. FROM THE DATE OF
INITIAL APPOINTMENT**

Respected Sir,

It is most humbly stated that I was appointed before your good self-Department as DM vide order dated 30.01.1996. That in the year 1997 the services were dispensed with on the ground that his services were no more required to the Department. That on promulgation of KP sacked Employees Act, 2012 I was submitted an application for reinstatement being covered under the said law but the same was not considered. Feeling aggrieved I was filed writ petition before the Peshawar High Court Mingora Bench, which was allowed. Dear Sir, I was appointed as PST w.e.f. taking over charge in light of the Peshawar High Court Mingora Bench Judgment. That in response I have submitted my charge report and stated duty quite efficiently and upto the entire satisfaction of my superiors. That I am entitle for fixation of pay from the date of my initial appointment i.e. 30.01.1996 but the concerned authority has been appointed me with immediate effect i.e. form the date of taking over charge. Sir, I am feeling aggrieved preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal I may kindly be allowed for pay fixation w.e.f 30.01.1996 with all back benefits. Any other remedy which your good self deems fit that may also be awarded in my favor.

Dated: 16.04.2020

YOUR OBEDIENTLY

ZAHOOR ALAM, PST

GPS Bibyawar, Dir Upper

Zahoor Alam

21

E-10

22

SCANNED
KPST
Peshawar

VAKALATNAMA

Before the 1st Senior Tribunal,

Peshawar

OF 2020

Zahoor Alam

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Dept.

(RESPONDENT)
(DEFENDANT)

I/We Zahoor Alam

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ___/___/2020

Zahoor Alam

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH YOUSAFZAI

&

**MIR ZAMAN SAFI
ADVOCATES**

OFFICE:
Flat No.3, Upper Floor,
Mia Club Building, Khyber Bazar,
Peshawar City.
Mobile No.0345-9383141