

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

C.M No:- \_\_\_\_\_/2024

In

Appeal No:- 628 /2024

**Rasool Bahadar**

**VS**  
**INDEX**

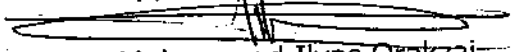
**DIRECTOR DEPTT:**

S#	Description of the Documents	Annex	Pages
1.	Application for correction with affidavit	*	1-3
2.	Copy of letter dated 26/09/2024 & pay slip of the appellant	"A"	4-5

Dated:- 27/09/2024

Through:-

Applicant/Appellant

  
Muhammad Ilyas Orakzai  
Advocate Supreme Court  
Of Pakistan

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

C.M No:- \_\_\_\_\_/2024

Khyber Pakhtunkhwa  
Service Tribunal

In

Appeal No:- 628 /2024

Diary No. 16176

Dated 20-09-24

Mr. Rasool Bahadar (Junior Clerk) GHS Ali Khel Tehsil Miran Shah  
District North Waziristan, S/o Sarwar Khan R/o Land Said Abad, P/o  
Boya Muhammad Khel, Tehsil Data Khel, District North Waziristan.

.....PETITIONER

**VERSUS**

1. The Director Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.
2. The District Education Officer (M), District North Waziristan.
3. The District Accounts Officer District North Waziristan.

..... RESPONDENTS

**APPLICATION FOR CORRECTION/ SUBSTITUTION**  
**IN RESPONDENT NO 2 IN THE ABOVE TITLED**  
**SERVICE APPEAL.**

**R/Sheweth:-**

The petitioner submits as under:-

1. That the above titled Service appeal is pending  
adjudication before this Honourable Tribunal and was  
lastly fixed on 27/09/2024.
2. That as per appointment order of the appellant, the  
appellant was appointed in Govt: High School Ali Khel,

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so the appellant made DEO (M) District North Waziristan as respondent No 2.

3. That after issuing notice from this Honourable Tribunal, they deny the posting of the appellant, so this Honourable Tribunal sought confirmation from the office of the District Education Officer (M) District North Waziristan.
4. That on above fixed date, the office of the respondent No 2 submitted letter No 2321 dated 26/09/2024 before this Honourable Tribunal regarding the present posting of the appellant, in the letter it is contended that the appellant presently posted and transferred to Govt: Girls High School Samandar Kot on 12/05/2020 and then transferred Govt: Girls High School Liaq Zaman Kot on 06/02/2023 and serving here till date.  
***Copy of letter dated 26/09/2024 & pay slip of the appellant are attached as annexure "A" & "B".***
5. That in view of the above situation requires to correction/substitution and be replaced and read as "The District Education Officer (Female) District North

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Waziristan" instead of "The District Education Officer (Male) District North Waziristan"

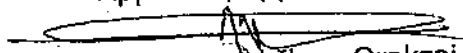
6. That this Honourable Tribunal has exclusive inherit powers to make an appropriate order for correction and substitution in above titled appeal.

It is, therefore, humbly prayed that on acceptance of instant application, an appropriate order for necessary correction/ substitution in the nomenclature of respondent No 2 as "The District Education Officer (Female) District North Waziristan" in the above titled appeal in the best interest of justice.

Dated:- 27/09/2024

Through:-

Applicant/Appellant

  
Muhammad Ilyas Orakzai  
Advocate Supreme Court  
Of Pakistan

**AFFIDAVIT**

As per instructions of my client, do hereby solemnly affirm and declare that the contents of this **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

  
DEPONENT



④ Annex A



**DISTRICT EDUCATION OFFICER FEMALE  
NORTH WAZIRISTAN DISTRICT**



Phone: (0928) 311907 Email Address: [deofemalenwtd@gmail.com](mailto:deofemalenwtd@gmail.com)


No. 2321 /DEO(F)/NWD

Dated 26/09/2024

To  
The District Education Officer,  
(Male) North Waziristan

Subject: REQUEST FOR PROVISION OF SERVICE CERTIFICATE OF MR:  
RASOOL BAHADAR J/CLERK.

Reference to your Letter No.5167 on the subject cited above, Mr. Rasool Bahadar appointed on District Education Office Male side on 02/02/2019 at Govt: High School Ali Khel and transferred to Govt: Girls High School Samandar Kot on 12/05/2020 and then transferred to Govt: Girls High School Laiq Zaman Kot on 06/02/2023 and serving here till date please.

  
(ANIQA HUMA TOUQEER)  
DISTRICT EDUCATION OFFICER  
(FEMALE) NORTH WAZIRISTAN



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Miran Shah-N.W.

Miran Shah-N.W.

S#:23627

P Sec:001 Month:August 2024

S#:23628

P Sec:001 Month:August 2024

MW6053 -GGHS Laiq Zaman Kot

MW6053 -GGHS Laiq Zaman Kot

Pers #: 50478618 Buckle:  
Name: RA'OOOL BAHADER  
JUNIOR CLERK

GGHS LAIQ ZAMAN KOT  
NTN:

Pers #: 50478618 Buckle:  
Name: RASOOL BAHADER  
JUNIOR CLERK

GGHS LAIQ ZAMAN KOT  
NTN:

CN. C No.2150193733725

GPF #:

CNIC No.2150193733725

GPF #:

GPF Interest Free

Old #:

GPF Interest Free

Old #:

11 Active Temporary

MW6053

11 Active Temporary

MW6053

PAYS AND ALLOWANCES:

PAYS AND ALLOWANCES:

0061-Basic Pay

25,200.00

2393-Adhoc Relief All 2024 25%

6,300.00

1001-House Rent Allowance 45%

2,778.00

1210-Convey Allowance 2005

2,856.00

1300-Medical Allowance

1,500.00

1528-Unattractive Area Allow

1,000.00

2315-Special Allowance 2021

3,500.00

2341-Dispr. Red All 15% 2022KP

2,282.00

2347-Adhoc Rel Al 15% 22(PS17)

2,282.00

2478-Adhoc Relief All 2023 35%

8,361.00

Gross Pay and Allowances

56,059.00

Gross Pay and Allowances

56,059.00

DEDUCTIONS:

DEDUCTIONS:

IT Payable 3,029.70 Deducted

606.00 TAX(3609) 303.00

IT Payable 3,029.70 Deducted

606.00

GPF Balance 96,510.00

Subrc: 1,920.00

GPF Balance 96,510.00

Subrc:

3501-Benevolent Fund

1,200.00

3534-R. Ben & Death Comp Fresh

600.00

3990-Emp.Edu. Fund KPK

135.00