


FORM OF ORDER SHEET

Court of _____

Appeal No. 1265/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	4/9/2024	<p>The appeal of Mr. Yasir Khan presented today by Mr. Muhammad Maaz Madni Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12/9/2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Yasir Khan received today i.e on 15.08.2024 is incomplete on the following score, which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of extract from service book be placed on file, to ascertain from what date the salary and annual increment of the appellant was started.

No. 601 /Inst./2024/KPST,

Dt. 15/8 /2024.

Amalullah
OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Maaz Madni Adv.

High Court at Peshawar.

*Received on 22.8.2024,
Resubmitted, please.*

[Signature]
22/8

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

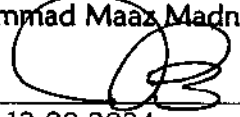
CHECK LIST

Case Title: YASIR KHAN V/S GOVT. OF KP & OTHER

S#	CONTENTS	YES	NO
1	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"/>	
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"/>
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: 12-08-2024

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____/2024

YASIR KHAN

V/S

GOVT. OF KP
& OTHERS


INDEX

S.NO	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1 - 4
2.	Condonation of Delay petition	5
3.	appointment order dated 31.05.2014/Sr Bk	A/AA	6 - 7/2 ✓/
4.	Charge Report dated 31.05.2014	B	8
5.	Regularization Order dated 12.03.2018	C	9 - 11
6.	Judgement dated 06.11.2023	D	12 - 15
7.	Departmental Appeal dated 19.04.2024	E	16
8.	Wakalatnama	17

Dated: 12th August, 2024

APPELLANT

Through:


MUHAMMAD MAAZ MADNI,
ADVOCATE HIGH COURT, PESHAWAR
TF-291, 292, Deans Trade Centre,
Peshawar Cantt:
0333-9313113, 0314-9965666
muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1265 /2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14961

YASIR KHAN S/O Khalid Khan, Drawing Master (B-15),
Govt. High School, Muhammad Nari, Charsadda.

Dated 15-08-2024
..... APPELLANT

VERSUS

- 1- **THE DIRECTOR (ELEMENTARY & SECONDARY EDUCATION),**
Khyber Pakhtunkhwa, Peshawar.
- 2- **THE DISTRICT EDUCATION OFFICER,**
District Charsadda.

..... RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 READ WITH ALL ENABLING LAWS & RULES AGAINST THE ACT & OMISSION OF THE PART OF RESPONDENTS BY NOT ALLOWING INCREMENT FOR THE YEAR 2014 & NOT RELEASING OUT STANDING SALARIES FOR THE MONTHS OF JUNE, JULY & AUGUST 2014 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL DATED 26-04-2024 AFTER LAPSE OF STATUTORY PERIOD OF NINETY (90) DAYS

*Filed to-day
Registrar
15/8/24.*

PRAYER IN APPEAL:

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 months of JUNE, JULY & AUGUST 2014 may very kindly be declared illegal and the respondents may very graciously be directed to allow the annual increment for the year 2014 with all back benefits and release of outstanding salaries for the month of JUNE, JULY & AUGUST 2014 while applying the PRINCIPLE OF PARITY. Any other remedy which this august Tribunal deems appropriate that may also be awarded in favor of the appellant.

*Re-submitted to-day
and filed.
Registrar
15/8/24.*

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 Primary School Teacher (BPS-12) on adhoc basis vide order dated 31/05/2014 after fulfilling all the legal & codal formalities required for the post and since then the appellant is performing his duty quite efficiently whole heartedly and upto the entire satisfaction of his high ups.

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

2. That appellant after receiving the appointment order dated 31/05/2014 submitted his arrival report and took over the charge of his post on date 31/05/2014 the same date the appellant received the appointment order.

Copy of Charge Report dated 31.05.2014 is attached as Annexure B.

3. That service of all the adhoc teachers were regularized vide Regularization Act, 2017 and accordingly the services of the appellant was also regularized vide order dated 12/03/2018 from the date of appointment i.e. 31/05/2014.

Copy of Regularization Order dated 12.03.2018 is attached as Annexure C.

4. That, one of my colleagues who was appointment with the appellant on the same day filed Service Appeal No. 7597/2021 title Abdul Musawir versus Govt. Of KP & others decided vide dated 06/11/2023 and allowed the same benefit to the appellant (Abdul Musawir).

Copy of Judgement dated 06.11.2023 is attached as Annexure D.

5. That while following the Principle of Parity the appellant also filed Departmental Appeal dated 19/04/2024 in light of the judgment dated 06/11/2023 which was allotted with dairy no. 709 but no response has been received so far after lapse of statutory period.

Copy of Departmental Appeal dated 26.04.2024 is attached as Annexure ... E.

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

GROUNDS OF APPEAL:

- A-** That act of the respondent by not allowing annual increment for the year 2014 & not releasing the monthly salary for the month of June, July & August 2014 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 needs interference of this Tribunal.
- 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 appellant has properly submitted his charge report well in time on 31/05/2024 and even then, the appellant was not allowed the benefit of Annual Increment for the year 2014 and also the outstanding salaries for the month of June, July & August 2014.
- D-** That under Article 38 (e) of the Constitution of Islamic Republic of Pakistan, 1973 that:
- “State is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan.”*
- therefore, the respondent has to act upon the ibid Article of the constitution and had to remove the disparity from the service of the appellant by allowing Annual Increment for the Year 2014 and releasing the monthly salary outstanding for the month of June, July & August 2014.
- E-** That the respondent has acted in an arbitrary and malafide manner by not allowing annual increment for the year 2014 & not releasing the monthly salary for the month of June, July & August 2014.
- F-** That act of the respondents is against the Fundamental Rights as enshrined in the Constitution & also against various judgments passed by the Apex Supreme Court of Pakistan.
- G-** That act of the respondents by not allowing annual increment for the year 2014 & not releasing the monthly salary for the month of June, July & August 2014 without fulfilling the codal formalities required in the subject matter and hence the same is against the norm of Natural Justice.
- 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.

Dated: 12-08-2024

Appellant



YASIR KHAN

Through:


MUHAMMAD MAAZ MADNI
Advocate, High Court, Peshawar

CERTIFICATE

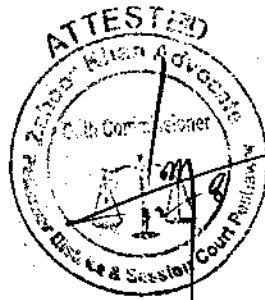
No, such like appeal has been filed or pending on the subject matter between the parties before this Honourable Tribunal.


ADVOCATE

A F F I D A V I T

I, YASIR KHAN S/O Khalid Khan; 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
17101-0203548-5



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

CM No. _____/2024 in APPEAL NO. _____/2024

YASIR KHAN... .. V/S GOVT. OF KP

APPLICATION FOR CONDONATION OF DELAY (IF ANY)

Respectfully Sheweth,;

1. That the appellant/petitioner has filed the above titled service appeal before this Honourable Tribunal which has not been fixed so far.
2. That the appellant/petitioner has challenged arrears of outstanding salaries for the month of June, July & August and Increment for the year 2014.
3. That case of the appellant/petitioner involves financial matter hence, no limitation runs against financial matter in light of various judgment of the superior courts of the country **2021 SCMR page 1320 citation (b)**.
4. That this Honourable Tribunal decided the case titled Abdul Musawir VS Govt. in light of judgment **2020 SCMR page 959** the appeal of the appellant/petitioner is well within time.
5. That it is well settled principle laid down by the Supreme Court of Pakistan in cases referred as **2023 SCMR page 8** and **2022 SCMR page 448 citation (i)**, the same question of Law has been decided by this Honourable Tribunal in the above-mentioned case same question has been decided.
6. That any grounds would be agitated at the time of argument with prior permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of the instant petition the delay (if any) may kindly be condoned in filing of the appeal.

Date: 12/08/2024

Appellant

Through:

MUHAMMAD MAAZ MADNI,
Advocates, High Court, Peshawar

AFFIDAVIT

It is solemnly affirm that the contents of the above application are true and correct to the best of knowledge & belief and nothing has been concealed from this Honourable Tribunal

Yasir Khan
DEPONENT
17101-0203548-5



6

OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) CHARSADEA

ANNEX -

A

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
99/144	YASIR KHAN 17101-0203548-5	GPS Inam Killi	Muhammad Nari	125.6

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.

ATTSTEF

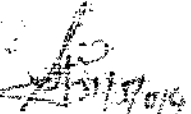
13. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

(Siraj Muhammad)
District Education Officer
(Male) Charsadda

Endst: No: 4807-4958 /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


District Education Officer
(Male) Charsadda

AA

1

- 1- Name (پت) Yasir Khan
- 2- Nationality and Religion Pakistani (Islam)
(قومیت اور مذہب)
- 3- Residence Mandau Tehsil Tangi "Charsadda"
(مستقل رہائش)
- 4- Father's name and residence Nasir Khan 'As Above'
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as nearly as can be ascertained "13-01-1990"
(تاریخ پیدائش مطابق سن عیسوی)
- 6- Exact height by measurement 5-6"
(قد و قامت)
- 7- Personal mark of identification 17102-2872837-3
(نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)
(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger
(چوٹکیا)

Ring Finger
(چوٹکیا کے ساتھ کی انگلی)

Middle Finger
(انگشت میاں)

Fore Finger
(انگشت ثبات)

Thumb
(انگشتا)

9. Signature of Govt. Servant
(سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office or other Attesting officer
(قصد لینے والے سر کے دستخط اور ہیر)

S. S. S. O. (M)
Tangi

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

اس صفحے کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہے اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

dani

dani

20

5

11

1 Name of Post	2 Whether Substantive or officiating and whether permanent or temporary	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-28 of C.S.R. (Pb.) Volume II	4 Pay in substantive position		5 Additional pay for officiating		6 Other emoluments falling under the term pay	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the Head of the office or other testing officer (attestation of column 1 to 8)	10 Date of termination or appointment
			Rs.	Ps.	Rs.	Ps.					
پست ملازمت PST GPs Mandani Office Mandani	کارگی مستقل یا قائم مقام	اگر کارگی ہے تو رواں کے مطابق پیش کیا گیا ہے					اسوائے تعمروہ دیگر لاؤٹس	تاریخ تقریری	دستخط سرکاری ملازم	دستخط اشرافیاز	تاریخ اطلاع ملازمت
G.P.S.											
Mandani	Conty				7000	1/17		9/17			
G.P.S.											
Mandani	per		Rs	9055				17/15			
- do -	- do -		B	9745				12/15			
- do -	- do -		Rs	11940				17/16			
- do -	- do -		B	12740				12/16			
- do -	- do -		B	15240				17/17			
- do -	- do -		B	16200				12/17			

Sub Divisional Education

S.D.E.O (Male)
Tangri

S.D.E.O (Male)
Tangri

S.D.E.O (Male)
Tangri

Sub Divisional Education

7	8	9	10	11	12	13		14	15	
Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praise of the Government servants	
تاریخ تقرری	دستخط سرکاری ملازم	دستخط افسر سرباز	تاریخ انقطاع ملازمت	دلیل انقطاع ملازمت	دستخط افسر سرباز	رضت کی نوعیت و معیار	پارا کی مدت کے لئے سب سے زیادہ	دستخط افسر سرباز	سزا یا نوبت کا ذکر کیا گیا ہے یا نہیں	
							Period	Government to which debitable		
							SERVICES VERIFIED			
							we have verified the services of this Officer from <u>11/02/18</u> to <u>30/11/20</u> from the Acquittance Roll and Other Records of this Officer.			
							Head of Section Officer (M. & T) Tanga			
							Passed D.M Exam from Sahbad University Peshawar under R.No-18-SP-03225 in Session SPR-2019. Marks obtained 786/1200 and placed in 1st division. Verification No: 2021/1193 Dated 23/11/2021.			
							Joint Sub. Div. Edu Officer (M. & T) Tanga			
							Found leave un-availed 01-09-2023 to 03-04-2024 (216 days) on Half Pay vide D.O (M) chd: Education No. 9152-57 dated 07-09-2023.			
							S. M. Khan Tanga			



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

9

NOTIFICATION

ANNEX-C

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/FJE & SED)/3-2/2018 / SIIT /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 mentioned against each in the Interest of public service.

Sl	Roll No. NTS	Name and Father Name	QOC No	Name of School	Total Marks out of 100	U/C	Appointment order No. & Date	Date of Taking Over Charge	Location No. & Date
1	1560039	Muhammad Khalid S/O Yusuf Ali	17102-6537002-5	GPS Station KIB	132.89	Abarzal	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
2	1560071	Murjan Ali S/O Saad Gul	17101-9766071-5	GPS Sheikh KIB	121.21	Agra	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
3	1560014	Miran Adil Shah S/O Mian Khayat Ullah	17101-6844013-5	GPS Agra Bab	116.33	Agra	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
4	1561340	Muhammad Amin S/O Izzat Muhammad	17101-9188159-3	GPS Agra Bab	114.58	Agra	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
5	1560163	Tilawat Shah S/O S.Waqayat Shah	17101-0113694-6	GPS Mandial	133.59	Battagram	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
6	1560941	Muhammad Shoaib S/O Fida Muhammad	17101-0315548-7	GPS Astara	129.66	Battagram	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
7	1560994	Shah Anwar S/O Rahim Khan	17101-0399895-3	GPS Marozai	124.24	Battagram	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
8	1560125	Muhammad Asim S/O Farveez Khan	17101-7492491-7	GPS Mathra New	121.45	Battagram	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
9	1561110	Shah Khalid S/O Sajid Shah	17301-4432180-5	GPS Mathra Qadeem	119.3	Battagram	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
10	1560007	Nasir Khan S/O Nadir Khan	17101-0307693-1	GPS Khairo Khan KIB	135.48	Behkela	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
11	1560845	Muhammad Ishaq S/O Muhammad Nabil	17101-3765891-7	GPS Mian Shakh No.6	132.34	Behkela	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
12	1561037	Yaseen Khan S/O Farwad Khan	17101-7716399-9	GPS Shaheedan	132.18	Behkela	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
13	2761364	Nizam Ullah S/O Ubaid Ullah	17101-6378089-5	GPS Islam Abad Dargal	135.83	Dargal	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
14	1561254	Muhammad Ali S/O Faqir Jan	17101-0300786-9	GPS Khatgal	118.45	Doubt Para	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
15	1560109	Karam Ul Haq S/O Abdul Dayan	17101-6170115-7	GPS Ambadher-1	116.29	Doubt Para	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
16	1560114	Azif Ullah S/O Noorqat Ali Shah	17101-0826588-1	GPS Doubt Para	114.31	Doubt Para	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
17	1560175	Umar Gul S/O Zakat Gul	17101-6375764-1	GPS Aziz Abad-2	121.66	Dheri Zardad	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
18	1561321	Abdurahman S/O Rehman Gul	17101-0342715-1	GPS Jan Abad	114.33	Dheri Zardad	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
19	1560954	Dawood Masood S/O Faraz Masood	17101-0328797-7	GPS Kalyas	104.56	Dheri Zardad	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
20	1560938	Zafar Ali S/O Muhammad Ali	17101-0260821-1	GPS Dosehra 3	116.17	Dosehra	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
21	1560980	Muhammad Gulzar S/O Meera Khan	17101-2239656-1	GPS Maryana-2	111.12	Dosehra	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
22	1561448	Jawad Muhammad S/O Abid Muhammad	17101-1671374-1	GPS Shah Dhand	117.17	Dosehra	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
23	1561186	Shakeel Ahmad S/O Farooq Shah	17102-7470651-9	GPS Karimo Banda	123.06	Gandhari	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
24	1561107	Weer Khan S/O Mustafa Khan	17101-5563178-3	GPS Marka Dher	116.54	Chunda Kartana	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017
25	1560761	Farhan Ullah S/O Anwar Rehman	17101-0319290-9	GPS Marka Dher	115.09	Chunda Kartana	4807-4958 Dated:31/05/2014	01-09-14	73938-24078 Dated:28/04/2017

27/09/16

Handwritten signature and stamp at the bottom right corner.

39	1560005	Khalil Ullah S/O Khair Ullah	17101-0401414-5	GPS Utmanzar-3	124.07	MC-Utmanzar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
40	1561533	Farhad Ali S/O Khan Bahader	17101-3658119-9	GPS Katigon	108.25	MC-Utmanzar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
61	1560915	Muhammad Adil Jan S/O Jan Alam	17101-9006856-5	GPS Bosa Khel-2	104.12	MC-1 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
62	1561158	Muazzam Jan S/O Muhammad Aslam	17101-8006111-9	GPS Qazi Khel-2	122.53	MC-1 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
63	1560185	Irfan Ullah S/O Gul Bad Shah	17302-4722563-9	GPS Rahmatullah Khan Kor	118.4	MC-1 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
64	1561380	Majid Shah S/O Jan Bad Shah	17101-8067215-1	GPS Rahmatullah Khan Kor	109.49	MC-1 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
65	1561289	Inam Ul Hassan S/O Aweel Mir	17101-1254810-2	GPS Khat Kili Prang	121.73	MC-2 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
66	1561189	Muhammad Zeeshan S/O Abdul Ur Rauf	17101-4729175-5	GPS Khat Kili	115.17	MC-2 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
67	1561894	Rasool Shah S/O Laddi Shah	17101-4723173-5	GPS Prang-3	114.8	MC-2 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
68	1561720	Asfandiyar S/O Fazli Malik	17301-3975994-3	GPS Prang-3	109.01	MC-2 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
69	1560015	Zafar Khan S/O Inayat Ullah Khan	17101-7165544-7	GPS Shabqadar Fort-2	99.7	MC-2 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
70	1560863	Dilawar Shah S/O Rafiq Shah	17101-4419772-5	GPS Bosa Khel Prang	114.04	MC-3 Chd	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
71	1560686	Tariq Jan S/O Badi-U-Zaman	17101-1602078-9	GPS Attaki-5	96.94	MC-3 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
72	1560872	Ihsan Ali S/O Taj Muhammad	17103-8368397-7	GPS Attaki-3	94.47	MC-3 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
73	1560866	Adnan Hussain S/O Gulab Hussain	17301-0989288-7	GPS Gonda	122	MC-3 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
74	1560842	Mohib Ullah S/O Mohammad Roshan Khan	17101-0108798-9	GPS Attaki-2	100.96	MC-3 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
75	1561778	Sayeed Masood Ahmad S/O S.Bad Shah Gul	17101-7305470-1	GPS Attaki-2	100.85	MC-3 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
76	1561225	Niaz Ali S/O Umar Khan	17101-1124090-3	GPS Attaki-3	100.07	MC-3 Shabqadar	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
77	1561028	Usman Ali S/O Shaikat Ali	17101-5172374-1	GPS Asmat Abad	116.6	MC-4 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
78	1561690	Irfan Ullah Alias Asad S/O Inayat Ullah	17101-0308575-3	GPS Umar Abad	115.34	MC-4 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
79	1561433	Nusrat Ali S/O Fazli Malik	17101-0253339-3	GPS IslamAbad-2	101.79	MC-4 Charsadda	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
80	2961681	Fazal Amin S/O Habib Rahim	17101-0958822-3	GPS Sheikh Munsaf Kili	125.38	Mera Umarzal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
81	1561413	Muhammad Imran S/O Khan Zareem	17101-8521338-3	GPS Enza Kili	114.57	Mera Umarzal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
82	1561279	Alamzeb Khan S/O Feroz Shah	17101-3836312-3	GPS Nawab Khan Kor	117.96	Mera Umarzal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
83	1561255	Asif Shah S/O Muhammad Zahir Shah	17101-2062079-9	GPS Shalmano Kili	116.1	Mera Umarzal	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
84	1560779	Shahid Ali S/O Jao Muhammad	17102-8561838-5	GPS Sikdar Garhi	120.42	Mirza Dher	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
85	1560819	Imtiaz Ahmad S/O Muhammad Nade	17102-5847695-7	GPS Mian Sahib Garhi	113.93	Mirza Dher	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
86	1561576	Yasir Khan S/O Khatid Khan	17101-0207548-9	GPS Inam Kili	125.6	Muhammad Nari	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
87	1561408	Qaiser Ali S/O Bahader Khan	17103-7317747-3	GPS Muhammad Nari	118.45	Muhammad Nari	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
88	1561428	Shahid Khan S/O Farh Subhan	17102-5783981-5	GPS Shah Afzal Abad	118.75	Muhammad Nari	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
89	1560026	Waqar Ullah S/O Naimat Ullah	17101-0357508-5	GPS PAI OSA JALIED	132.78	Nissatta	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
90	1560772	Sheher Ghayas Khan S/O Jaleh Shah	17102-7071293-3	GPS Parao-1	130.3	Nissatta	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017
91	1561877	Rubeer Khan S/O Shaker Khan	17103-0942333-9	GPS Shalmano Khan Kor	125.45	Panipoo	4807-4958 Dated:31/05/2014	01-09-14	23938-24078 Dated:28/04/2017

10

Imran Ullah

NOT



BY-DISTRICT EDUCATION OFFICER
 (MALE) CHARSADDA

Handwritten signature and date:
 12/23/18
 018

- Copy forwarded for information to the:-
1. Director, Govt. Model Khyber Paktunkhwa Peshawar.
 2. District Officer, Peshawar.
 3. District Officer, Mardan.
 4. District Monitoring Officer, PAFI, (Peshawar).
 5. District Officer, Mardan.
 6. District Officer, Tangi.
 7. District Officer, Shabqan.
 8. District Officer, Mardan.
 9. District Officer, Mardan.
 10. District Officer, Mardan.

Order No. 19747-2018 P.N.U. (Regularization PST 2018) Dated: 12/23/2018

(SIRAJ MUHAMMAD)
 DISTRICT EDUCATION OFFICER
 (MALE) CHARSADDA

1.) Their services shall be governed by the Khyber Paktunkhwa (Civil servants Act, 1973, the Khyber Paktunkhwa (Appointment, Deposition, Posting & Transfer of Teachers, Lecturers, Inspectors & 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 GPF in terms of the Khyber Paktunkhwa (Civil Servants Act, 1973 as amended in 2013.

3.) Their services are liable to termination on one month's 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 favor 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/ testimonials from the concerned Board/ University by the SDCO concerned.

8.) The employees whose services are regularized under the Khyber Paktunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Paktunkhwa Act No. 1 of 2018) or in the process of maintaining service at the commencement of the Khyber Paktunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Paktunkhwa 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 Paktunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Paktunkhwa 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 employee older in age shall rank senior to the younger one.

TERMS & CONDITIONS

Sl. No.	Name	Grade	Age	Qualification	Date of Birth	Date of Joining
422	Syed Iqbal S/O Ali Akbar	GPS Special Trainee	116.54	Shodag	20762-856	08-04-17
423	Nadeem Jan S/O Khan Balader	GPS Trainee No.2	112.6	Barab	20762-856	08-04-17
424	Muhammad Ali S/O Zor Ullah Khan	GPS Trainee No.1	111.76	Tarnab	20762-856	08-04-17
425	Mahar Ali S/O Bithar Ali	GPS Untrained	110.94	Tarnab	20762-856	08-04-17
426	Muhammad Zohab S/O Muhammad Zohab	GPS Untrained	106.85	Umarzai	20762-856	08-04-17
427	Abdul Majid S/O Abdul Bari	GPS Untrained	112.95	Cherki Baidad	20762-856	08-04-17
428	Alian Ullah S/O Yousaf Gul	GPS No. 1 Trainee	120.14	M.C. Tangi	27462-71	22-05-17
429	Muhammad Zohab S/O Zohab Ullah	GPS No. 1	121.32	Charsadda	27462-71	22-05-17
430	Muhammad Ullah S/O Muhammad Ullah	GPS Asst. Ed.	106.74	Kotabakhshali	27462-71	03-09-17
431	Asif Ullah (Dhawan) (Dhawan) S/O Gul Rahman	GPS Dhawan	121.59	Dhawan	23547-51	03-09-17
432	Syed Wahar Shah S/O Syed Farah Shah	GPS Haida Kili	109.59	Shodag	20773-76	03-09-17
433	Yasir Ijaz S/O Dhan Khan	GPS Khamrod	121.61	Chardoda	20777-80	03-09-17

(11)

12

Annex - D

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

ATTESTED
8-8-24
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

R

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.

ATTESTED

[Signature]
8-8-24
CARTNER
District Attorney
Peshawar

[Signature]

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.

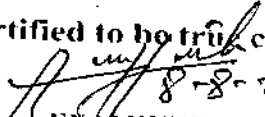
8. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 6th day of November, 2023.*


 (MUHAMMAD AKBAR KHAN)
 Member (E)


 (RASHIDA BANO)
 Member (J)

Katoomulhi

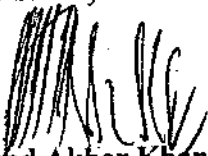
Date of Presentation of Application 8-8-24
 Number of Words 4
 Copying Fee 5
 Urgent 5
 Total 25
 Name of Officer A. J. V. V. V.
 Date of Copying 5-8-24
 Date of Delivery of Copy 8-8-24


Certified to be true copy

 8-8-24
 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

15

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)

To

THE DISTRICT EDUCATION OFFICER (MALE)
District Charsadda.

16

Diary No 709-16/4/202

ANEX - 'E'

Subject: APPLICATION FOR THE GRANT OF INCREMENT FOR THE YEAR 2014
AND SALARIES FOR THE MONTHS OF JUNE, JULY & AUGUST 2014.

Respected/Sir,

Most respectfully, it is stated that I am working under your kind control in District Charsadda. I was appointed as PST (BPS-12) vide order Endst No. 4807-4958 dated 31-05-2014. After performing duty for sufficient time my service was regularized with the promulgation of the Act of 2017.

While our official service commencement date was 31/05/2014, the government began issuing our salaries from 01/09/2014, and according to the said salary our increment for the year 2014 was not allowed to me.

Furthermore, I wish to highlight a recent development within our department wherein one of my colleagues namely Abdul Musawir successfully pursued legal action and approached Khyber Pakhtunkhwa Service Tribunal Peshawar to rectify this issue and his case was graciously allowed. As a result, the department issued the petitioner with all withheld salaries and corresponding increments in alignment with initial appointment date.

In the light of this precedent and the principle of equal treatment for all employees, I am respectfully requesting that the department extends the same consideration to me as the said petitioner and I have been appointed with the same Endst Number and on same date, May 31, 2014.

In this respect, it is therefore requested that salaries for the months of June, July & August 2014 and increment for the year 2014 may kindly be allowed to me in line with the principles of justice and fairness, please.

Thank you for your time and consideration.

Obediently Yours

Name: Yasir Khan

Designation: DM

School: GMS Bridge Killa

Contact No: 0300 9054 355

Signature: [Signature]

Date: 16/04/2024

(POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2024

YASIR KHAN

VS

GOVT. OF KP & OTHERS

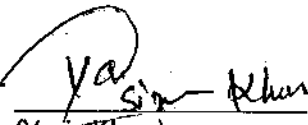
I, Yasir Khan do hereby nominated and appointed **MUHAMMAD MAAZ MADNI**, Advocate High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred 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 _____ day of _____ 2024.

EXECUTANT


(Yasir Khan)

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,

TF-291 & 292, Deans Trade Centre, Peshawar Cantt.

Contact#: 0333-9313113, 0314-9965666