


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1441/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	11/09/2024	<p>The appeal of Mr. Sajid Khan presented today by Mr. Gul Tiaz Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on 22.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

Appeal No. 1441 /2024

Sajid Khan PST Government Primary School Janakki Tehsil &  
District Tank. ....Appellant

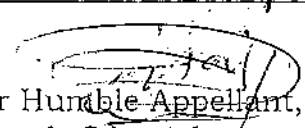
**VERSUS**

The District Education Officer (Male) Tank. ....Respondent

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7	Wakalat Nama	-	24

Dated: 9/09/2024

  
Your Humble Appellant,  
Through Counsel

**Irfan Khan Taju Khel**  
**Advocate High Court**  
**D.I.Khan**

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1. That the address given in the memo of Appeal are sufficient for the purpose of service of the parties.
2. That the Appellant is a citizen of Islamic Republic of Pakistan and being a citizen of the country, the appellant has the rights and obligations under the constitution.
3. That the Education Department KPK advertised different posts in the year 2019 in the Education department including the posts of PST to be appointed in District Tank and the appellant being qualified and eligible to be appointed as PST also applied for the same.
4. That the Appellant was not appointed as PST in spite of eligibility on merit, therefore, the appellant filed a writ

Respectfully Sheweth,

**STATUTORY PERIOD OF 90 DAYS**

UNDER HEAD 3541 @ Rs. 2120/- P.M WITHIN THE

DATED 28.05.2024 FOR NON-DEDUCTION OF C.P FUND

DISPOSAL OF REPRESENTATION OF THE APPELLANT

AGAINST THE ORDER OF WITHHOLDING AND NON-

APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT 1974

The District Education Officer (Male) Tank ..... Respondent

**VERSUS**

District Tank ..... Appellant

Sajid Khan PST Government Primary School Janakda Tehsil &

Appeal No. 1441 /2024

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

2

Petition No. 431-D/2020 in the Peshawar High Court D.I.Khan Bench which came up for hearing before a Division Bench on 22.12.2021 and the same was allowed with observation and direction to respondent to consider the appellant for appointment against the post of PST as per his merit position as the appellant has wrongly been deprived of his appointment on merit. Copies of Writ Petition alongwith order dated 22.12.2021 are enclosed as **Annexure - A&B** respectively.

5. That after decision of the High Court the order of the High Court was not implemented, therefore, the appellant then filed a petition for initiating contempt proceeding against the respondent and during the pendency of contempt petition, the appellant has been appointed as PST vide office order Endst: No. 3499-3505/DEO-M/Conditional Order/2022 dated 05.08.2022 but the appellant has been given seniority with effect from 13.05.2020 as per merit position alongwith the other appointees which have already been appointed but appellant was deprived and name of the appellant has been placed as serial No. 546 of the seniority list. Copies of appointment order and relevant page of the seniority list are enclosed as **Annexure - C&D** respectively.

6. That although the appellant has been appointed vide order dated 05.08.2022, but the appellant has been granted seniority with effect from 13.05.2020 alongwith others

*J. Khan*

who have already been appointed as such from whom only GP Fund under head 3012 is being deducted but it is very strange that from the monthly pay/ salary of appellant both the funds i.e. GP Fund under head 3012 @ Rs. 3300/- P.M as well as CP Fund under head 3541 @ Rs. 2120/- P.M are being deducted / recovered. Copies of pay slip of appellant as well of other colleagues of appellant are enclosed as **Annexure - E,F&G** respectively.

7. That the appellant submitted representation dated 28.05.2024 containing the request for non-deduction of CP Fund under head 3541 @ Rs. 2120/- P.M from the monthly pay/salary of appellant which has duly been forwarded to the office of respondent by the head teacher of GPS Janakki District Tank but the same has not been decided by the office of respondent within the statutory period of 90 days. Copy of representation is enclosed as **Annexure - H.**

8. That feeling aggrieved from the impugned actions/ Inactions of respondent's office not to decide the presentation of appellant has not been decided within the statutory period of 90 days, therefore, having no other way, the appellant is obliged to knock the door of this honourable Tribunal under its appellate jurisdiction inter alia on the following grounds:

*Jyoti*

GRUNDS:

A. That it is an admitted fact proved from record that the

appellant has been granted seniority with effect from

13.05.2020 as per merit position under the observations

of honourable High Court and the appellant was rightly

given seniority as per terms & conditions of appointment

order i.e. serial No. 13 alongwith other colleagues who

have already been appointed as such on 13.05.2020 and

from whom only GP Fund is being deducted but the

appellant has been met out discriminated treatment and

double funds i.e. GP Fund and GP Fund are being

deducted from the appellant.

B. That the appellant is entitled for equal treatment of law

under the provisions of fundamental rights guaranteed

under the Constitution but the appellant has met out

discriminated treatment at the hands of office of

respondent and instead of deduction only GP Fund under

head 3012 @ Rs. 3300/- P.M another amount of GP Fund

under head 3541 @ Rs. 2120/- P.M is also being

deducted, therefore, such treatment of double recovery of

both the funds amounts to double jeopardy which is

against the law of the land.

C. That it is the legal and moral obligations of office of

respondent to decide the representation of the appellant

within reasonable time, with reason and to communicate

the result of the same to the appellant but he failed to do so.

- D. That provisions of Article-4 of the constitution provide constitution guarantee to the peoples and citizens that the executive cannot take their rights of life, liberty and property without legal justification but appellant has been deprived by the respondents of his legal and vested rights.
- E. That this Honourable Tribunal has vast powers under the constitution and is the custodian of constitution and fundamental rights of the citizens of the country.
- F. That Counsel for Appellant may please be allowed to raise additional grounds during the course of arguments.

In view of the submissions made above, it is, therefore, humbly prayed that on acceptance this Appeal, this Honourable Tribunal may very graciously be pleased to pass an order declaring the impugned actions / inactions of the office of Respondent to be void, illegal, against law, without lawful authority and without jurisdiction and as a consequence thereof, respondent may please directed to consider and process the case of appellant for non-deduction of CP Fund @ Rs. 2120/- P.M under head 3541 and also to refund the amount of CP fund already deducted from the appellant with effect the date of appointment of appellant so as to meet the ends of justice and fair play.

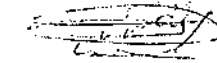
*gpr*

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Any other relief deemed appropriate in the prevailing circumstances may also be granted.

Dated: 9/09/2024

Your Humble Appellant,

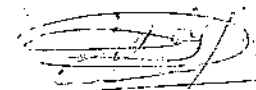


**Sajid Khan**  
Through Counsel

**Irfan Khan Taju Khel**  
**Advocate High Court**  
**D.I.Khan**

**CERTIFICATE:**

Certified that it is a first Appeal before this Honourable Tribunal by the appellant on the subject.



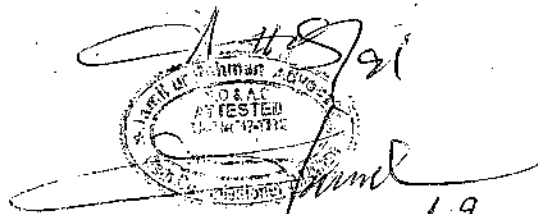
**Appellant**

**AFFIDAVIT:**

I, Sajid Khan PST Government Primary School Janakki Tehsil & District Tank, the appellant do hereby solemnly affirm and declare on Oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

**DEPONENT**

12101-9440260-9



09/9/24





**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

CMA No. \_\_\_\_\_

2024

In

Appeal No. \_\_\_\_\_  
2024

Sajid Khan PST Government Primary School Janakki Tehsil & District Tank.....Petitioner

**VERSUS**

The District Education Officer (Male) Tank.....Respondent

**PETITION FOR INTERIM RELIEF CONTAINING THE REQUEST TO  
ISSUE DIRECTIONS TO RESPONDENT NOT TO MAKE  
RECOVERY / DEDUCTION FROM THE MONTHLY PAY OF  
APPELLANT OF CP FUND @ RS. 2120/- P.M UNDER THE HEAD  
3541 AND TO MAINTAIN STATUS QVO TILL DISPOSAL OF  
APPEAL OF APPELLANT.**

*Respectfully Sheweth*

1. That the accompanied Appeal is being filed before this learned Tribunal against the action of non-disposal of Representation of appellant by respondent within the statutory period of 90 days.
2. That the appellant impugned the action/inaction of recovery of double funds i.e. GP Fund / CP Fund from the monthly pay of appellant.

3. That the petitioner has a prima facie good case.

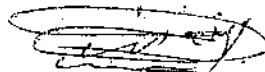
4. That the balance of convenience also lies in favour of petitioner.

5. That the petitioner would sustained irreparable loss had the impugned order of deduction of CP Fund from the monthly pay of the petitioner has not been suspended and the object and purpose of the accompanied appeal would become illogical and fruitless.



In view of submission made above, it is, therefore, humbly prayed that on acceptance this petition, this Honourable Tribunal may very graciously be pleased to pass an order directing the respondent not to deduct an amount of Rs. 2120/- P.M under head 3541 from the monthly pay of appellant/petitioner till disposal of appeal.

Your Humble Petitioner



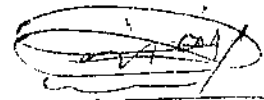
**Sajid Khan**  
Through Counsel

Dated: 9/09/2024


*Irfan*  
**Irfan Khan Taju Khel**  
**Advocate High Court**  
**D.I.Khan**

**AFFIDAVIT:**

I, Sajid Khan PST Government Primary School Janakki Tehsil & District Tank, the appellant do hereby solemnly affirm and declare on Oath that the contents of the Petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.



**DEPONENT**

*Irfan*  
  
*Irfan*

*09/9/24*

BEFORE THE PESHAWAR HIGH COURT, DERA ISMAIL KHAN BENCH

Writ Petition No. /2020.

A 9



1. Sajid Khan Son of Hassan Ghulam Resident of Janky, Post office Karri Haider Tehsil & District Tank present Model town, Post Office PTJ, Dera Ismail Khan.
2. Amanullah son of Haider Khan Resident of village and post office Kirri Haider Tehsil & District Tank.
3. Toseefullah son of Sher Ali Resident of village and post office Kirri Haider Tehsil & District Tank.
4. Asad Bilal son of Akhtar Munir Shakir Resident of village and post office Kirri Haider Tehsil & District Tank.
5. Zia Ur Rehman son of Muhammad Zaman Resident of Maghzai, Post office Umar Adda, Tehsil & District Tank.

(Petitioners)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary (Elementary and Secondary Education) Department, Peshawar.
2. Director, Elementary and Secondary Education, Peshawar.
3. District Education Officer (Male), District Tank.

(Respondents)

WRIT PETITION UNDER ARTICLE 199 OF  
THE CONSTITUTION OF ISLAMIC REPUBLIC  
OF PAKISTAN 1973.

Note:- Addresses given above are sufficient for the purpose of service of parties.

BRIEF FACTS.

1. That the respondents advertised different post in education department including the posts of PST teachers in district Tank. Copy of publication is enclosed herewith as ANNEXURE A.
2. That the petitioner No.1 is DVM along with PTC, Petitioner No.2 is Master in Islamiyat as well as B.Ed, Petitioner No.3 is master in Islamiyat as well as PTC, Petitioner No.4 is master in Islamiyat as well as M.Ed and Petitioner No.5 is MSe in Zoology and having M.Ed requisite qualification, applied for the post of PST. Copies of testimonials are enclosed herewith as Annexure-B.
3. That the respondents shown vacant posts of PST in different union councils for the year 2019, wherein union council Waraspoon, there were six (6) vacant posts of PSTs

WP No.431-D of 2020 (Grounds)

EXAMINER

in the union council. Copy of list showing vacancies is enclosed herewith as Annexure-C.

4. That the respondents then issued tentative merit list, wherein the names of the petitioners are appearing at serial No. 3,5,6,8 and 9 respectively but astonishingly in the merit list it has been mentioned that the list is displayed only for one post in the UC Waraspoon. Copy of merit list is enclosed herewith as Annexure-D.
5. That subsequently one Zahid Mahmood shown at serial No.1 was appointed as PST in UC instead of six candidates.
6. That being aggrieved and having no other appropriate remedy, the petitioners approach this Honourable Court for the redressal of their grievances on inter-alia the following grounds:

GROUNDS.

1. That all the petitioners are qualified for the post of PST and all of them did qualify the requisite exam of FTS and obtained marks, which placed them in the merit list as mentioned above.
2. That it is admitted fact that there were SIX (6) vacancies of PST in the UC Waraspoon district Tank, for which applications were asked for and thereafter FTS was conducted and a tentative merit list was also prepared, therefore the petitioners, after securing highest marks in the test, got better position in the merit list, got wasted right to be appointed as PST and the respondents after test and interview could not decrease the number of posts of PST in the UC, after duly advertisement and displaying the list of the vacant posts in entire district.
3. That there is no occasion for the respondents not to fill the other vacancies except for the mala fide on the part of the respondents because tomorrow again these post have to be advertise to fill the same but of course through the candidates of their own choice.
4. That the petitioner has been discriminated by the official respondents without any law full justification by not appointing the petitioners, despite the availability of vacancies and candidates having qualified the test.
5. That it is settled principal of law by now that when the posts are advertised and merit lists are prepared then seats/ vacancies available cannot be decreased in any manner.
6. That the counsel for the petitioner may be allowed to raise additional grounds during the course of arguments.

It is, therefore, humbly prayed that the respondents may be directed to act in accordance with law, rules and policy of the government and the petitioner may be declared as qualified candidate for the post of PSTs. Any other relief as deemed

WP No.431-D of 2020 (Grounds)

EXAMINOR  
Peshawar High Court, Genl.

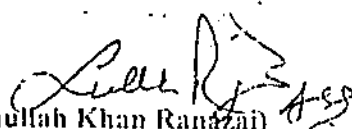
appropriate in the circumstances of the case not specifically asked for may also be granted to the petitioner.

INTERIM RELIEF:

Pending disposal the writ petition, respondents may be restrained from filling the five vacant posts of PST in any manner.

Your humble petitioner;  
Through counsel.

Dated: 18.05.2020

  
(Saleemullah Khan Ramazai)  
Advocate Supreme Court.

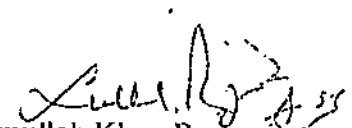
BOOKS REFERENCES.

1. Constitution of Islamic Republic of Pakistan 1973.
2. Service Laws.
3. Reported Judgment on the subject matter.

CERTIFICATE

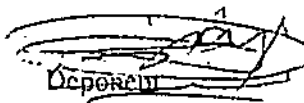
Certified that it is the first petition on the subject matter from the petitioner's side and nothing has been concealed from this Honourable Court.

Dated: 18.05.2020

  
(Saleemullah Khan Ramazai)  
Advocate Supreme Court.

AFFIDAVIT.


I, Sajid Khan son of Hassan Ghulam Resident of Janky, Post office Karri Haider Tehsil & District Tank present Model town, Post Office PTL, Dera Ismail Khan, the petitioner No.1, do hereby solemnly affirm and declare on Oath that the contents of writ petition are true and correct according to my knowledge and belief and nothing has been concealed from this Honourable Court.

  
Deponent

12101-9440260-9

Identified by

Dated: 18.05.2020

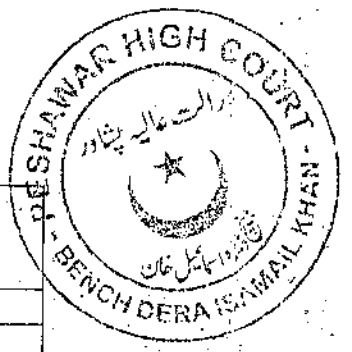
  
(Saleemullah Khan Ramazai)  
Advocate Supreme Court.

B

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PESHAWAR HIGH COURT, D.I.KHAN BENCH

FORM OF ORDER SHEET



Date of order or proceedings	Order or other proceedings with signature of Judge(s).
(1)	(2)
22.12.2021	<p><u>W.P. No.431-D/2020 with Interim Relief &amp; C.M.Nos.601-D/2020, 851-D/2021.</u></p> <p><u>Present:-</u> Mr. Salimullah Khan Ranazai, Advocate for the petitioners.</p> <p>Mr. Kamran Hayat Miankheil, Addl. A.G. for the respondents.</p> <p>***</p> <p><u>Sahibzada Asadullah, J.-</u> Through the instant writ petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner has prayed for directing the respondents to act in accordance with law, rules and policy of the Government with further prayer that petitioner be declared qualified candidate for the post of primary school teacher.</p> <p>2. Brief facts as narrated in the writ petition are that the petitioner No.1 is possessing degrees of DVM, PTC, M.A Islamiyat and B.Ed. as well as M.Ed, whereas petitioner No.5 has done his M.Sc. in Zoology and also possessing M.Ed. degree; that the petitioners applied for the posts of Primary School Teacher, which were shown vacant by the respondents in different union councils, whereas six</p>

9

EXAMINOR

Peshawar High Court Bench, Dera Ismail Khan. 3/4/24

posts in union council Waraspoon were shown vacant; that the respondents issued a tentative merit list, wherein names of the petitioners appeared at serial Nos.3, 5, 6, 8 and 9, respectively, but it was to their surprise when one post in union council Waraspoon was shown in the merit list. Hence, this constitutional petition.

3. In pursuance of the order of this Court, the respondent No.4 furnished para-wise comments, wherein stance of the petitioner was rebutted on the ground that only one post of PST was vacant in union council Waraspoon, District Tank, but erroneously six posts were advertised due to establishment of Govt. Primary School Kirri Maghzai Arzi Khan Kalai in the same union council in the year 2016-17, vide Chief Planning Officer E&SE Department letter No.CPOZ/SPO-1/PO/E&SE-1/ADP/2016-2017/Provincial dated Peshawar the 08.6.2017, issued by the Government of Khyber Pakhtunkhwa; that subsequently, in the light of the decision by Provincial Cabinet Khyber Pakhtunkhwa meeting held on 26.10.2017, it was notified that lady teachers be appointed in newly boys established schools. It has been further alleged by the answering respondent that the male candidates including the petitioners could not be appointed because the posts in the said school were sanctioned

WITNESSES:

EXAMINOR

Peshawar High Court Bench,  
Dera Ismail Khan 3/9/24

by the Finance Department for recruitment of female candidates. The learned counsel for the petitioner also filed rejoinder to the comments, where stance of the respondents was rebutted.

4. Arguments heard and record gone through.

5. Before proceeding further, it is pertinent to mention that certain C.Ms. i.e. C.M. No.601-D/2020, 851-D & 940-D/2021 have been filed for submission of additional documents, which are allowed and the documents annexed thereto are made part and parcel of the writ petition.

6. The record tells that six posts were advertised for recruitment of primary school teachers in union council Waraspoon against which the petitioner and one other held to be on merit for selection, however, but only one candidate was appointed and rest of five posts, according to respondents, were converted for appointment of female lady teachers. As per direction of this Court, a document placed on the record by Sub Divisional Education officer (Male), Tank, via C.M. No.940-D of 2021 shows twelve primary schools were established in union council Waraspoon. In such view of the matter, the plea taken by respondents for refusing to appoint the petitioners has no leg to stand

EXAMINOR

EXAMINOR

Rawalpindi High Court Bench,  
Dera Ismail Khan

03/19/24



upon. The learned Additional Advocate General when confronted with the above, he candidly admitted the same fact.

7. In view of what has been discussed above, this writ petition is admitted and allowed, resultantly, the respondents are directed to consider the petitioners for appointment against the post of PSTs in any of the 12 schools, since they have been selected on merit and wrongly held that there was only one school in union council of the petitioners.

Announced  
Dr. 22.12.2021.

(AP)  
S  
JUDGE

*[Handwritten Signature]*  
JUDGE

*Office  
for  
17/12/21*

EXAMINER  
Punjab High Court, Patna  
Oera Ismail Khan 03/19/24

*Handwritten marks and signatures at the top left of the page.*

Their appointments is purely on contract basis initially for one year with effect from 03-08-2022.

The appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the District Education Office (Male) Tank, anyone found producing this certificate will be reported to the law enforcing agencies for further action and said appointment will be cancelled automatically & candidate concerned will have no right of appeal in any forum. Expenditure on verification will be borne by the appointees.

Appointees are liable to terminate on one month notice from either side. In case of resignation about period, one-month pay/allowances shall be forfeited to the Government Treasury.

Appointees will not be drawn with a certificate regarding verification of their documents is issued by this office.

They should join their posts within 15 days of the issuance of this order. In case of failure to do so, the post will be considered vacant and their appointment will stand expired automatically.

The candidates concerned should produce health and age certificate duly signed by the Superintendent DHQ Hospital Tank before taking over charge.

They will be governed by such rules and regulations as may be issued from time to time by the Government.

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 issued from time to time.

**CONDITIONS**

Name of Candidate	Father's Name	Date of Birth	CNIC No	Score	Place of Posting
Amjad Khan	Haider Khan	16-02-91	1220158948637	116.749	GPS Wazir Khan
Saif Khan	Hassan Ghulam	15-11-90	1210194402609	113.111	GPS Janaki
Sheer Ali	Sheer Ali	06-08-95	1220131469439	110.114	GPS Kim Haider

On the right of judgment of Honorable Peshwar High Court Bench Dara Ismail Khan, dated 15-01-2022, appointment of the following (03) candidates is ordered hereby on merit against the vacant post of Primary School Teacher (BPS-12 (Rs. 19770-1430-62670) @ Rs. 19770/- fixed plus usual allowances as per rules) in the light of the existing policy of the Provincial Government in teaching cadre on the terms and conditions given below with effect from 03-08-2022, subject to the CPLA/appeal of this office against aforementioned judgment of Honorable Peshwar High Court Bench Dara Ismail Khan and any other contrary as and when issued by the Government of Pakistan.

**APPOINTMENT ORDER**

OFFICE OF THE DISTRICT EDUCATION OFFICER  
 MALE TANK

*Handwritten numbers 16 and 5.*

D      18

Sl	Name of Official	Father's Name	Present place of Posting	Desig.	BPS	Qualifi.	Prof. Qualificati on	B.V. U.Sc. Div.	Subject in BA/Esc.	Date of Birth	Date of entry into Service	Date of promotion to the present post	Score	Remarks
526	SAIF UR REHMAN	ABDUL QADIR	GPS NO.1 AMA KHEL	PST	BPS-12					07-06-1951	13-03-2020		122.05	
527	MUHAMMAD SALEEM	MUHAMMAD HAWAZ	GPS NO.2 SHERAN	PST	BPS-12	MA Ist:		2nd	Actt	05-01-1932	18-03-2020		121.84	
528	FARVAN ULLAH	INSAN ULLAH	GPS NO.1 KOT KAT	PST	BPS-12					04-10-1993	18-03-2020		121.45	
529	SHAH HALID	KALO KHAN	GPS NO.1 PAJ	PST	BPS-12					04-04-1997	18-03-2020		121.43	
530	MUHAMMAD ZAHID	MAUSHAK ALAM	GPS LAKKI MACHAN KHEL	PST	BPS-12					14-09-1955	18-03-2020		121.34	
531	JAMIL AHMAD	MUHAMMAD QASIM	GPS DAUD KEEL	PST	BPS-12					14-04-1972	18-03-2020		120.89	
532	AFRASYAB	SHUKAT ALI	GPS WANDAZALO	PST	BPS-12					14-05-1973	18-03-2020		120.62	
533	MUHAMMAD NOJAN	MIBAL KHAN	GPS NO.1 RANWAL	PST	BPS-12	MS:	M.Ed	1st	Phys:3	24-04-1996	18-03-2020		118.23	
534	DIL HAWAZ	AMIR HAWAZ	GPS DOBT MUHAMMAD	PST	BPS-12	MA	M.Ed	1st		18-11-1989	18-03-2020		117.65	
535	ADNAN ANWAR	ANWAR JAN	GPS BALLAR ABAD	PST	BPS-12	BSC E.Eng:				04-05-1996	18-03-2020		116.88	
536	FARIQ MEHMOOD	SULTAN MUHAMMAD	GPS DABBARA NO.1	PST	BPS-12	BSc	PTC B.Ed	2nd	Stat:	01-12-1984	18-03-2020		113.58	
537	IRFAN ULLAH	SAID HAWAZ	GPS HURANG	PST	BPS-12					14-08-1992	18-03-2020		107.44	
538	MUHAMMAD ALTAF	AJAS KHAN	GPS SAADAT KORONA	PST	BPS-12	BS Bio	PTC	1st		25-03-1997	30-04-2020		116	
539	VIKAZ MUHAMMAD	SAAD ULLAH	GPS MURTAZA	PST	BPS-12	B-Tech	PTC	1st	M/P	05-03-1993	30-04-2020		108.67	
540	ZAHID MEHMOOD	NAIK MUHAMMAD	GPS KOT GUL BAEHRAM	PST	BPS-12					16-04-1991	13-05-2020		128.35	
541	MUHAMMAD IRFAN	HUSSAIN AHMAD	GPS NO.3 TANJ	PST	BPS-12	Pharma D		1st		15-10-1993	13-05-2020		126.9	
542	MUHAMMAD HIKMAT YAR	ABDUL QADIR	GPS SHIEKH SULTAN	PST	BPS-12	B-Tech (H)		1st	M/P	10-04-1992	13-05-2020		117.1	
543	AJWAN ULLAH	HAIDER KHAN	GPS WAROOKI	PST	BPS-12					16-02-1991	05-08-2022		116.739	
544	SAEED ANWAR	ABDUL HAMID	GPS ABIZAR	PST	BPS-12	BSc MA Ist:	PTC M.Ed	2nd	Camp:	25-12-1992	13-05-2020		116.72	
545	MUNAWAR KHAN	SAID ALAM KHAN	GPS NO.3 KKBARI	PST	BPS-12					05-05-1989	13-05-2020		116.7	
546	SAJID KHAN	HASSAN GHULAM	GPS JANAK	PST	BPS-12	MSc		1st	Zoole:	15-11-1990	13-05-2020		113.111	Court case seniority will be considered wef 13-05-2020

*Attested  
Jaffer  
Bhatti*

Dist. Govt. KP-Provincial  
District Accounts Office Tank  
Monthly Salary Statement (December-2023)

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Information of Mr SAJID KHAN d/w/s of HASSAN GHULAM.  
Tel Number: 01012799 CNIC: 1210194402609.  
Birth: 15.11.1990 Entry into Govt. Service: 06.08.2022

NTN:  
Length of Service: 01 Years 04 Months 027 Days.

Employment Category: Active-Temporary

Designation: PRIMARY SCHOOL TEACHER, 80005026-DISTRICT GOVERNMENT KHYBE

DDO Code: TK6005-DY: DISTRICT OFFICER (MALE) PRY: TANK

Payroll Section: 001

GPF Section: 001

Cash Center:

PR A C No:

GPF Interest Free

GPF Balance:

49,262.00 (provisional)

Grade Number:

Pay Band Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 12

Pay Stage: 1

Wage type	Amount	Wage type	Amount
1001 Basic Pay	21,200.00	1001 House Rent Allowance 45%	2,940.00
1300 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2341 Teaching Allowance 2021	2,664.00	2341 Dispr. Red All 15% 2022KP	1,998.00
2378 Adhoc Re! All 15%22(newex)	1,998.00	2378 Adhoc Relief-All 2023 35%	6,919.00

Deductions - General

Wage type	Amount	Wage type	Amount
3501 GPF Subscription	-3,300.00	3501 Benevolent Fund	-1,200.00
3990 DC Pension Emp KP 2022	-2,120.00	3990 Emp.Edu. Fund KPK	-135.00
3994 R. Benefits & Death Comp:	-600.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till DEC-2023: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 42,075.00 Deductions: (Rs.): -7,355.00 Net Pay: (Rs.): 34,720.00

Payee Name: SAJID KHAN

Account Number: 0790934391003427

Bank Details: MCB BANK LIMITED, 241293 CIRCULAR ROAD D.I.KHAN, D.I.KHAN

Leave: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

CP: TANK

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: sajidkhanbhitani41@gmail.com

Attested  
Jaffer  
Adm

**DIST. GOVT. NWFP-PROVINCE**  
**District Accounts Office Tank**  
**Monthly Salary Statement (December-2023)**

Personal Information of Mr. MUHAMMAD HIKMAT YAR d/w/s of ABDUL QADIR KHAN

Province Number: 0041242 CNIC: 1220172752047 NTN: \_\_\_\_\_  
 Date of Birth: 10/01/1972 Length of Service: 03 Year 07 Months 01/9/1997  
 Employment Category: Active Temporary

Designation: PRIMARY SCHOOL TEACHER  
 District Code: TANKS-DY. DISTT OFFICER (Males) PVT TANK  
 R0005026-DISTRICT GOVERNMENT KHYBE

Payroll Section: 001 (GPF Section: 001) Cash Center: \_\_\_\_\_  
 GPF A/C No: \_\_\_\_\_ Business Applied: Yes (GPF Balance: 51,505.00)

Pay and Allowances: Pay Scale: UPS For - 2022 Pay Scale Type: Civil (BPS: 12) Pay Stage: 4

Wage Type	Amount	Wage Type	Amount
Basic Pay	25,490.00	House Rent Allowance 45%	2,940.00
Travel Allowance 30%	2,850.00	Medical Allowance	1,500.00
Teaching Allowance 20%	2,664.00	Diary Red All 15% 2022KP	2,286.00
Adhoc Ret All 15% 2022(17)	2,286.00	Adhoc Relief All 2023 35%	8,421.00

Wage Type	Amount	Wage Type	Amount
GPF Subscription	-3,300.00	R. Benefits & Death Comp	-600.00
Emp. Ret. Fund RFR	-135.00		

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
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**Deductions - Income Tax**

Payable	Recoverd till December-2023:	Exempted: (0.00)	Recoverable: (0.00)
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Gross Pay (Basic): 48,413.00 Deductions (Total): -5,235.00 Net Pay (Basic): 43,178.00

Payee Name: MUHAMMAD HIKMAT YAR  
 Account Number: 238512194  
 Bank Details: UNITED BANK BRANCH TANK, TANK  
 Opening Balance: \_\_\_\_\_ Available: \_\_\_\_\_ Balance: \_\_\_\_\_

Permanent Address: City: TANK  
 Temp. Address: \_\_\_\_\_  
 City: \_\_\_\_\_  
 District: \_\_\_\_\_  
 Homeing Status: No Official

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Monthly Salary Statement (December-2023)

Personal Information of Mr. MITHANJALI IRANJAN (DOB: 01/04/1981)

Permanent Number: 06-939621 CNIC: 122011101595

Date of Birth: 01/04/1981

Employing Govt. Service: 14/05/2020

Length of Service: 05 Years 07 Months 01 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL TEACHER

80065026-DISTRICT GOVERNMENT KHYBER

DISTRICT: TRAKHAYI DISTRICT OFFICER (EX-AM) PRT. BANK

GPF Section (01) Cash Center

GPF Balance: 125,173.00 Interest Applied: Yes

Vendor Number:

Pay Scale: BPS For - 2022

Pay Scale Type: Civil

Pay Grade: 12

Pay and Allowances:

Wage type	Amount	Wage type	Amount
Basic Pay	25,400.00	House Rent Allowance 45%	2,940.00
Grave Allowance 2015	2,550.00	Medical Allowance	1,900.00
Teacher Allowance 2023	7,660.00	Dist. Rtd All 15% 2022NP	2,280.00
Admin. Rtd All 15% 2023NP	2,280.00	Admin. Rtd All 2023 15%	8,421.00

Deductions - (General)

Wage type	Amount	Wage type	Amount
GPF Subsidy	3,300.00	Health & Death Comp	600.00
Employee Provident Fund (EPF)	1,135.00		

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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Deductions - Income Tax

Payable: 0.00 Recovered (if December-2023): 0.00 Exempted: 0.00 Recoverable: 0.00

(Gross Pay Rate) 48,445.00 (Deductions-(R.S.)) -5,235.00 (Net Pay (R.S.)) 43,208.00

Payee Name: MITHANJALI IRANJAN

Account Number: 30240048910765014

Bank Details: BANK AL FAYDH LIMITED, 362024 Tank Branch Tank Branch, Tank

Letters: Opening Balance As added: Balance: Balance:

Permanent Address:

City: TANK

Temp. Address:

Country:

Housing Status: No Official

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consideration as the same CP Fund is not being  
13 of the appointment order, which requires re-  
and the same is violative of condition at serial No.  
the applicant which amounts to discrimination  
deducted @ Rs. 2120 P.M from the pay/salary of  
appointees of year-2020 but the same is being  
That CP fund is not being deducted from the  
personal

appointment order is enclosed herewith for kind  
13.05.2020 as per merit position. Copy of  
been ordered to be considered with effect from  
Distt: Tank but seniority of the applicant has  
3499-3505 dated 05.08.2022 in GPS Janaki  
"PST" in BPS-12 vide office order Endst. No.  
No. 431-D/2020, the Applicant was appointed as  
Bench dated 22.12.2021 passed in Writ Petition  
honourable Peshawar High Court D.I.Khan  
That pursuant to the judgment/ order of

lines for your sympathetic consideration please:-

The Applicant submits the following few

Sir,

APPLICANT  
P.M. FROM THE PAY/SALARY OF  
CP FUND UNDER HEAD 3541 @ RS. 2120  
APPLICATION FOR NON-DEDUCTION OF

Subject:

Through: PROPER CHANNEL.

The District Education Officer (M)  
Tank.

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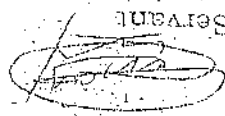
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deducted from the other colleagues of the applicant who are of the same merit position.

(3) That the applicant is also entitled for the same equal treatment as the colleagues of the applicant have been met out.

It is, therefore, requested that GP fund mentioned in the subject may not be deducted from the monthly pay/salary of the applicant keeping in view the condition at serial No. 13 of the appointment order.

Dated: 28/05/2024



Your Obedient Servant

Sajia Khan

PST

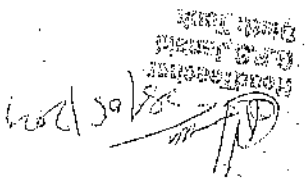
GPS Jamaki Tehsil & Distt. Tank

Cell No. 0342-7979349

Forwarded in original  
to the D.E.O (M) Tank  
for consideration please

Head Teacher

GPS JAMAKI TANK



Attended  
Jyoti Adw





مقدمہ  
Sajid Khan / Appellee  
Sajid Khan / Appellee  
Sajid Khan / Appellee

درویش / Respondent  
Sajid Khan / Appellee

باعت پر آئینہ  
طرحہ دعا علیہ علیہ

مقدمہ  
Sajid Khan / Appellee

مقدمہ  
Sajid Khan / Appellee

2024

03425454541

Accepted  
Sajid Khan / Appellee

Attested & Accepted  
Gul Tiaz Khan Marwal  
Advocate High Court  
Distt: Bar

Distt: Ismail Khan (FATA)