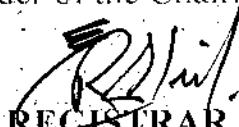


FORM OF ORDER SHEET

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

Appeal No. 1919 /2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2024	<p>The present appeal resubmitted today by Muhammad Ismial Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 17.10.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The joint appeal of Mr. Mustafa Zeb and 33 others received today i.e. on 03.09.2024 is in complete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal be signed by the appellants.
- 2- Check list is not attached with the appeal.
- 3- Annexures of the appeal are not attested.
- 4- Sub-rule- 2 of rule-3 of the appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately. Therefore, the appeal of the above named appellants may be filed separately/individually.
- 5- Annexures of the appeal are illegible be replaced by legible/better one.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 774 /Inst./2024/KPST,

Dt. 12/9 /2024.

  
OFFICE ASSISTANT,  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Ismail Khan Adv.  
High Court Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

Service Appeal No. 1919 / 2024

Ali Gauhar VERSUS The District Education Officer (Male) District Charsadda.

INDEX SHEET

S.No	Descriptions	Annexure	P.No
1	Memo of Appeal		1-5
2	Affidavit		6
3	Notices to Parties		
4	Copies of appointments orders of Appellants dated 31-05-2014	A	7-8
5	Copies of appellants Charges Report dated 31-05-2014	B	9
6	Copies of Schools attendance Register dated 31-05-2014 of appellants	C	10
7	Copies of Service Books of appellants	D	11-12
8	Copies of Regularization Order of appellants	E	13-15
9	Copies of Promotion Order of appellants	F	16-19
10	Copies of applications/request to SDEO/DEO	G	20
11	Copy of SDEO Letter to DEO	H	21-23
12	Copy of same identical nature case service appeal No- 7597/2021 decided on dated 06-11-2023 by Kp Service Tribunal	I	24-23
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Appellant

Through counsel

Muhammad Ismail Khan

Amin-Ullah Jan

Amjid Khan Mohmand

Advocates High court Peshawar.

Office: Al Mansoor Hotel opposite Gulbahar Police Station Near BRT Stop  
Main GT Road Peshawar. 0346-9192028

①

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO 1919 /2024

Ali Gauhar S/O Zameer Gul (SPST, BPS-14) Government Primary School Mahmood Abad , Shabqadar District Charsadda

.....Appellant...

Versus

1. The Director Education Elementary and Secondary Education Khyber Pakhtun Khwa Near Govt Higher Secondary School No-1 GT Road Peshawar.
2. The District Education Officer (DEO) Male District Charsadda.
3. The Sub District Education Officer (SDEO) Shabqadar District Charsadda.
4. The Accountant General AG office Khyber Pakhtun Khwa Fort Road Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT ALLOWING/RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, AND ALSO REQUEST FOR ALLOWING THE INCREMENT FOR YEAR 2014, AND AS WELL AS AGAINST THE DEPARTMENTAL APPEAL WHICH SUBMITTED ON DATED 08-05-2024 WHICH NOT DECIDED IN STIPULATED PERIOD , WHICH IS THE INACTION OF THE DEO MALE CHARSADDA, WHEREAS THE DEPARTMENT NOT GIVEN ANY RESPONSE TO APPELLANTS.

PRAYERS.

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL WITHIN THE STIPULATED PERIOD AND NOT ALLOWING THE ANNUAL INCREMENT FOR THE YEAR 2014 AND NOT RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, MAY VERY KINDLY BE DIRECTED TO ALLOWING THE INCREMENT FOR THE YEAR 2014 WITH ALL BACK BENIFITS AND ALSO RELEASE THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014. OR ANY OTHER REMEDY/RELIEF WHICH THIS HON'BLE COURT/TRIBUNAL DEEMS FIT AND APPROPRIATE MAY KINDLY ALSO BE AWARDED/PASSED IN FAVOUR OF APPELLANTS, AS THE SAME ISSUE AND QUESTION IN IDENTICAL NATURE CASE IN SERVICE APPEAL NO 7597 OF 2021 ALSO BEEN ALLOWED AND DECIDED ON DATED 06-11-2023 BY THIS HON'BLE COURT.

Respectfully Sheweth.

The Appellants humbly submits as under.

**FACTS.**

Brief facts of the Appeal are as under.

1. That the Appellants are the employee of the education Department, and were initially appointed as Primary School Teacher PST BPS-12 on ADHOC Basis after fulfilling all the legal and codal formalities required for the post under the law and Rules Regulation.

2. That all the Appellants after scrutiny and through proper channel by the Departmental Selection Committee DSC Under the supervision of DEO Male and other respected members of the committee appointed the appellants as primary school teacher PST BPS-12 on dated 31-05-2014.

(Copies of Appointments Orders dated 31-05-2014 is attached and annexed as A)

3. That the Respondent issued the appointments orders for the post of PST to all the Appellants, and when all the appellants received the appointment orders on dated 31-05-2014, they submitted their arrival reports and took over Charge reports of the PST Posts assigned in the appointments orders on dated 31-05-2014, and made entry in the Attendance Register in the school, since then the appellants are working with full zeal and according to their efficiency and with full devotion satisfaction of the School Head.

(Copies of Charge Reports dated 31-05-2014 annexed as B and attendance Register Attached as C)

4. That Service Book of the Appellants was also prepared and necessary entries were made therein in the service books from the date of initial appointments till date.

(Copies of Service Books are attached and annexed as D)

5. That after satisfactory duties of all the Adhoc Teachers, the Govt of Kp through Regularization Act 2017 including appellants in the year 2018 they all were regularized from the date of their initial appointments orders i.e. 31-05-2014. the date which is 31-05-2014 is also mentioned in the heading of the regularization order of the Appellants as well as other candidates of PST.

(Copy of Regularization Order annexed as E)

6. That thereafter the appellant were also promoted from the Post of PST BPS-12 to post of Senior Primary School Teacher SPST BPS-14 by the Departmental Promotion Committee DPC under the supervision of DEO and other officials, Vide order dated 19-05-2020. And the Appellants were in at Serial No

(Copy of Promotion orders annexed as F)

7. That the appellant were facing huge financial discrepancy in their monthly salaries due to the reasons that increment for the year 2014 were not allowed and also the salaries for month of June July and august 2014, were not released for which the appellants made several visits and request verbally as well in shape of applications appeals etc.

(Copies of application and appeals annexed as G)

8. That at last the Respondent No-3 SDEO Shabqadar send one letter to DEO Male Charsadda on dated 22-04-2024, for further action but despite applications reminders to Respondents, they are not given positive response.

(Copies of SDEO Male letter to DEO annexed as H)

9. The service appeal decision in the same nature issue and matter had came to the knowledge of the appellants, which also mentioned in the application; title case ABDUL MUSAWIR VS EDUCATION DEPARTMENT service appeal.No- 7597 of 2021, which was decided by the Hon'ble Bench Member of Service Tribunal Peshawar on dated 06-11-2023, whereas the same relief given and granted to one teaching cadre who also appointed with the appellants as PST and later he regularized and also promote as SPST BPS-14.

(Copy of same identical nature case and Court order of KP service Tribunal dated 06-11-2023 annexed as I)

10. That after the above said mentioned process, when no such relief given to appellants, then the appellants filed departmental appeal to Directorate Education, and attached all the relevant documents correspondence, but till now, no such response/relief given to appellants.

(Copies of Departmental appeals to Directorate annexed as J)

11. That the appellants were also visited to concern quarter of accounts office to allow and include the same increment as well as salaries to appellants, but till date the same is neither included nor been allowed in the appellants salaries slip records.

12. That feeling aggrieved from the inaction of the respondents to not decide the departmental appeal and by not allowing the annual increment for year 2014 as well as the salaries of the month of June July and August 2014, the repeatedly visits applications requests and at last departmental and same identical nature service decided case/appeal, the respondents on no grounds And without showing any reasons were silent on the appellant appeals.

13. That feeling aggrieved by all the appellants, and having no other remedy except filing this service appeal on the followings grounds.

#### GROUND:

- A. That the act and omission of the Respondents by illegally deducting annual increment for the year 2014, and not releasing the monthly salary for the month of June, July and August 2014, is against the law, facts material available on records and norms of natural justice hence not tenable in the eyes of law and is liable to be struck down.
- B. That the appellants has not been treated by the respondents department in accordance with law and rules on the subject noted above and as such the Respondents violated article 4 and 5 of the Constitution of Islamic Republic of Pakistan 1973.
- C. That the Appellant has properly submitted his charge report and made attendance Register of the school on dated 31-05-2014, and as such the appellant has spent 180 days on 1st December, that the entitles the appellant for the annual increment of the year 2014.
- D. That the act of the Respondents by illegally deducting annual increment for the year 2014, and not releasing the monthly salary for the month of June, July and August 2014, is against the prevailing Law and Rules.
- E. That the Respondents violated Article 38(E) of the constitution of the Islamic Republic of Pakistan 1973, according to which "*The state is bound to eliminate disparity in the income and earning of individuals including persons in the various service of Pakistan*". Thus in light of above the Respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July and August 2014.

- F. That the Respondents acted in arbitrary and malafide manner, while illegally deducting the annual increment for the year 2014, and not releasing salaries for the month of June July and August 2014.
- G. That the Act and omission of the Respondents by illegally deducting annual increment for the year 2014, and not releasing of the monthly salaries for the month of June, July and August 2014, is nothing but depriving the appellant from the legal rights of livelihood.
- H. That the appellant seeks permission to advance other grounds and proofs evidence at the time of hearing and arguments.
- I. That other ground will be discussed at the time of arguments with prior permission of this Hon'ble Court.

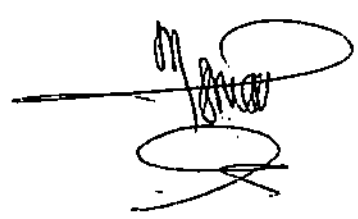
IT IS THEREFORE HUMBL Y PRAYED THAT, ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE INACTION OF THE RESPONDENTS BY NOT ALLOWING THE ANNUAL INCREMENT FOR THE YEAR 2014 AND NOT RELEASING THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014, AND NOT DECIDED THE DEPARTMENTAL APPEAL WITHIN STIPULATED PERIOD, THE RESPONDENTS MAY VERY KINDLY BE DIRECTED TO ALLOW THE INCREMENT FOR THE YEAR 2014 WITH ALL BACK BENIFITS AND ALSO RELEASE THE OUTSTANDING SALARIES FOR THE MONTH OF JUNE, JULY AND AUGUST 2014. OR ANY OTHER REMEDY/RELIEF WHICH THIS HON'BLE COURT/TRIBUNAL DEEMS FIT AND APPROPRIATE MAY KINDLY ALSO BE AWARDED/PASSED IN FAVOUR OF APPELLANTS, AS THE SAME ISSUE AND QUESTION IN IDENTICAL NATURE CASE IN SERVICE APPEAL NO-7597 OF 2021 ALSO BEEN ALLOWED AND DECIDED ON DATED 06-11-2023 BY THIS HON'BLE COURT, And any other relief and remedy deems justified by this Hon'ble Tribunal may also be passed in favour of the appellant for the interest of justice.

APPELLANT



Ali Gauhar

Through Counsel



5

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO \_\_\_\_\_/2024

Ali Gauhar, S/O Zameer Gul (SPST, BPS-14) Government Primary School Mahmood  
Abad, Shabqadar District Charsadda

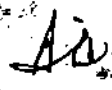
VERSUS

The Director Education Khyber Pakhtun Khuwa Peshawar and others

Certificate.

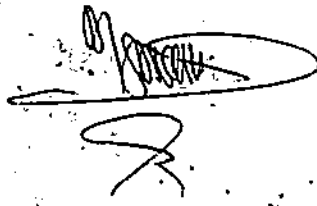
It is certified that, no such like appeal has been file of pending on the subject matter  
between the parties before this Hon'ble Tribunal.

APPELLANT



Ali Gauhar

Through Counsel





BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

6

Service Appeal No. \_\_\_\_\_ / 2024

Ali Gauhar S/O Zameer Gul (SPST, BPS-14) Government Primary School Mahmood  
Abad, Shabqadar District Charsadda

.....Appellant

VERSUS

1. The District Education Officer (Male) District Charsadda.
2. The Secretary Elementary and Secondary Education, KP Peshawar
3. The Director Education Directorate of Elementary and Secondary Education Peshawar
4. The SDEO Male Shabqadar District Charsadda.

.....Respondents

AFFIDAVIT

I, Ali Gauhar S/O Zameer Gul (SPST, BPS-14) Government Primary School Mahmood  
Abad, Shabqadar District Charsadda, do hereby solemnly affirm and states on oath  
that the contents of accompanying appeal are true and correct to the best of my  
knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

IDENTIFIED BY

Muhammad Ismail  
Advocate High Court



Through counsel

Ismail Khan  
Umar Khan  
Amjid Khan Mohmand  
Advocates High court Peshawar

Pr-24

Appointment Order PST (M) Ad hoc -Based

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

**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
32/144	ALI GAUHAR 17103-0371185-7	GPS Mahmood Abad	Haji Zai	117.8

**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.

**Appointment Order PST (M) Ad hoc -Based**

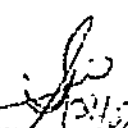
13. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

**(Siraj Muhammad)  
District Education Officer,  
(Male) Charsadda**

Endst: No: 4607-4958 / Dated: Charsadda the: 31/5/2019

Copy forwarded for information and necessary action to the: -

1. Director E&SF 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**

Head Master  
GPS Mahmood Abad

31/05/2014

31/05/2014

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162	1356/3/11	بابت...	...						
163	1356/3/12	بابت...	...						
164	1356/3/13	بابت...	...						

11

~~11~~

Note:- The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

unltd  
in 2009  
d'fms  
1-9-2014

1. Name: MR. ALI GAUHAR ✓

2. Race: AFGHAN

3. Residence: Villaji Mahzada Plo Haji'zai Tehsil Shabqadar Dist Charsadda

unltd  
01  
4. Verified  
Phawas.  
-06-2014

4. Father's name and residence: ZAMEER GUL  
Villaji Mahzada Plo Haji'zai Tehsil Shabqadar Dist Charsadda

5. Date of birth by Christian era as nearly as can be ascertained: (03-03-1993) ✓

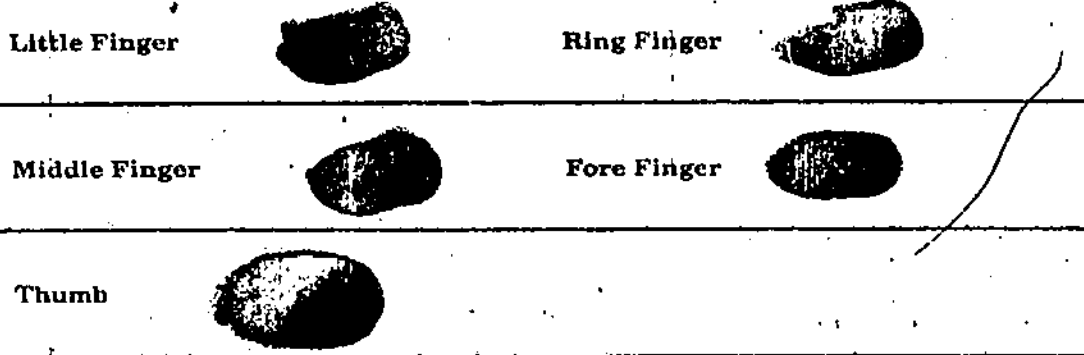
6. Exact height by measurement: 5'-8"

Date  
unltd  
01/3  
2013

7. Personal marks for identification: Nil


8. Left hand thumb and finger impression of (Non-Gazetted) officer:

3.  
on  
1. M. Anwarul  
2013 and  
3. \*  
27 NO:



9. Signature of Government Servant: 

unltd  
29/9/2017  
2028  
M. Anwarul  
District Officer  
Charsadda

10. Signature and designation of the Head of the Office, or other Attesting Officer.  
  
ASD SO (M)  
Shabqadar  
Circle (Chd)  
9. D. Anwarul  
Charsadda

12

12

9	10	11	12	13		14	15	
				Period	Government to which debarable			
<p>Signature of Government Servant.</p>	<p>Signature and Designation of the head of the office or other attesting officer. In attestation of columns 1 to 8</p>	<p>Date of termination or appointment</p>	<p>Reason of termination such as promotion, transfer, dismissal, etc.)</p>	<p>Signature of the head of the office or other attesting officer.</p>	<p>Nature and duration of leave taken.</p>	<p>Allocation of period of leave on temporary pay upto four months for which leave salary is distributable to another Government.</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure or praise of the Government Servant.</p>
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2018</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>			<p><b>NOTIFICATION</b>            (Appointment and regularization of the services) Act, 2017 (Khyber Pakhtunkhwa Act no.1 of 2018) and Elementary &amp; Secondary Education Department Govt: of Khyber Pakhtunkhwa Notification No. 50(S/F. &amp; SED/3-2/2018/SITT/ Contract dated Peshawar the 16/02/2018, services of the following(433) primary School Teachers appointed through NTS on Adhoc basis on contract w.e.f ( 31-05-2014 to 15-07-2017), are hereby regularized in BFS-12 on the same posts in Teaching cadre vide DEO( M) Chd Endst:No 19747-20188 dated 12-03-2018.</p>	
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>19/5/2020</p>	<p>promoted to BPS-12</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
	<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>				
<p>Sub Divisional Education Officer (Male) Shabqadar</p>	<p>30/11/2017</p>	<p>MP</p>	<p>Sub Divisional Education Officer (Male) Shabqadar</p>					

**NOTIFICATION**  
 (Appointment and regularization of the services) Act, 2017 (Khyber Pakhtunkhwa Act no.1 of 2018) and Elementary & Secondary Education Department Govt: of Khyber Pakhtunkhwa Notification No. 50(S/F. & SED/3-2/2018/SITT/ Contract dated Peshawar the 16/02/2018, services of the following(433) primary School Teachers appointed through NTS on Adhoc basis on contract w.e.f ( 31-05-2014 to 15-07-2017), are hereby regularized in BFS-12 on the same posts in Teaching cadre vide DEO( M) Chd Endst:No 19747-20188 dated 12-03-2018.

Service verified w.e.f 01/12/2017  
 to 30/11/2018 From the A.O.G. roll and other record of this office

Service verified w.e.f 01/12/2017  
 to 30/11/2018 From the A.O.G. roll and other record of this office

Sub Divisional Education Officer (Male) Shabqadar

**OFFICE OF THE DIRECTOR, EDUCATION (M.A.P.) PESHAWAR**

**NOTIFICATION**

In pursuance of the Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education (Appointment and Regulation of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) and Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. 50 (S/F/E & S.E.O/3-2/2018/SIT/Contract dated Peshawar the 26/02/2018, services of the following (43) Primary School Teachers appointed through SITS 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 Code on the terms and condition given below with effect from the date of their appointment as mentioned against each in the list of public servants.

Sl. No.	Name and Other Name	CMC No.	Post of Grade	Thru	From	Appointed on	Date of Take Over	Other Charge	Creation No. & Date
1	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
2	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
3	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
4	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
5	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
6	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
7	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
8	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
9	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
10	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
11	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
12	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
13	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
14	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
15	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
16	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
17	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
18	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
19	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
20	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
21	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
22	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
23	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
24	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
25	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
26	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
27	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
28	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
29	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
30	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
31	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
32	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
33	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
34	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
35	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
36	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
37	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
38	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
39	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
40	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
41	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
42	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078
43	Muhammad Ghani S/O	17101-0313002	Teacher A	17179	17179	4807-4358	01-09-14		2332-24078

13



Sl. No.	Name	Grade	Age	DOB	Religion	Marital Status	Address	Signature
27	...	...	...	...	...	...	...	...
28	...	...	...	...	...	...	...	...
29	...	...	...	...	...	...	...	...
30	...	...	...	...	...	...	...	...
31	...	...	...	...	...	...	...	...
32	...	...	...	...	...	...	...	...
33	...	...	...	...	...	...	...	...
34	...	...	...	...	...	...	...	...
35	...	...	...	...	...	...	...	...
36	...	...	...	...	...	...	...	...
37	...	...	...	...	...	...	...	...
38	...	...	...	...	...	...	...	...
39	...	...	...	...	...	...	...	...
40	...	...	...	...	...	...	...	...
41	...	...	...	...	...	...	...	...
42	...	...	...	...	...	...	...	...
43	...	...	...	...	...	...	...	...
44	...	...	...	...	...	...	...	...
45	...	...	...	...	...	...	...	...
46	...	...	...	...	...	...	...	...
47	...	...	...	...	...	...	...	...
48	...	...	...	...	...	...	...	...
49	...	...	...	...	...	...	...	...
50	...	...	...	...	...	...	...	...
51	...	...	...	...	...	...	...	...
52	...	...	...	...	...	...	...	...
53	...	...	...	...	...	...	...	...
54	...	...	...	...	...	...	...	...
55	...	...	...	...	...	...	...	...
56	...	...	...	...	...	...	...	...
57	...	...	...	...	...	...	...	...
58	...	...	...	...	...	...	...	...
59	...	...	...	...	...	...	...	...
60	...	...	...	...	...	...	...	...
61	...	...	...	...	...	...	...	...
62	...	...	...	...	...	...	...	...
63	...	...	...	...	...	...	...	...
64	...	...	...	...	...	...	...	...
65	...	...	...	...	...	...	...	...
66	...	...	...	...	...	...	...	...
67	...	...	...	...	...	...	...	...
68	...	...	...	...	...	...	...	...
69	...	...	...	...	...	...	...	...
70	...	...	...	...	...	...	...	...
71	...	...	...	...	...	...	...	...
72	...	...	...	...	...	...	...	...
73	...	...	...	...	...	...	...	...
74	...	...	...	...	...	...	...	...
75	...	...	...	...	...	...	...	...
76	...	...	...	...	...	...	...	...
77	...	...	...	...	...	...	...	...
78	...	...	...	...	...	...	...	...
79	...	...	...	...	...	...	...	...
80	...	...	...	...	...	...	...	...
81	...	...	...	...	...	...	...	...
82	...	...	...	...	...	...	...	...
83	...	...	...	...	...	...	...	...
84	...	...	...	...	...	...	...	...
85	...	...	...	...	...	...	...	...
86	...	...	...	...	...	...	...	...
87	...	...	...	...	...	...	...	...
88	...	...	...	...	...	...	...	...
89	...	...	...	...	...	...	...	...
90	...	...	...	...	...	...	...	...
91	...	...	...	...	...	...	...	...
92	...	...	...	...	...	...	...	...
93	...	...	...	...	...	...	...	...
94	...	...	...	...	...	...	...	...
95	...	...	...	...	...	...	...	...
96	...	...	...	...	...	...	...	...
97	...	...	...	...	...	...	...	...
98	...	...	...	...	...	...	...	...
99	...	...	...	...	...	...	...	...
100	...	...	...	...	...	...	...	...

41

120

15

422	2031001233	Sayed Khan S/O Ali Akbar	17102-9394848-175	GPS Spinal Tangi	116.54	Sholing	20762-454 Dated:21/03/2017	08-04-17
423	2035001449	Masroor Jan S/O Khan Bahader	17102-9394848-196	GPS Tarnab No.2	112.8	Tarnab	20762-454 Dated:21/03/2017	08-04-17
424	2031001021	Muhammad Ali S/O Zaki Ullah Khan	17102-9394848-197	GPS Tarnab No.2	111.76	Tarnab	20762-454 Dated:21/03/2017	08-04-17
425	2035001107	Mazhar Ali S/O Inkhwar AB	17102-9394848-198	GPS Umarzal No.1	114.95	Umarzal	20762-454 Dated:21/03/2017	08-04-17
426	201701921	Muhammad Zahab S/O Muhammad Yousof	17102-9394848-199	GPS Dheri Zardub No.1	112.85	Dheri Zardub	20762-454 Dated:21/03/2017	08-04-17
427	2032001161	Abdul Majid S/O Abdul Bari	17102-9394848-200	GPS Mubeen Rahmani E2F	116	Muzumzal	27482-71 Dated:20/05/2017	11-05-17
428	2017000247	Imran Ullah S/O Yousof Gul	17102-9394848-201	GPS No.1 Tangi	120.14	MC-Tangi	27482-71 Dated:20/05/2017	23-05-17
429	2017000286	Muhammad Ullah Khan (Disable Quota) S/O Zahid Ullah	17102-9394848-202	GPS No.1 Charsadda	111.32	MC-88 Charsadda	27482-71 Dated:20/05/2017	22-05-17
430	203200125	Muzat Ullah S/O Abarasid	17102-9394848-203	GPS Arsal KOB	108.74	RazBehran/Dheri	27330-34 Dated:21/03/2017	01-09-17
431	2033001129	Aziz Ullah Rehman (Disable Quota) S/O Gul Rehman	17102-9394848-204	GPS Dhakki	111.59	Dhakki	27547-53 Dated:21/03/2017	01-09-17
432	201700483	Syed Waqar Shah S/O Syed Farah Sita Shah	17102-9394848-205	GPS Halder KOB	109.53	Shodda	28573-76 Dated:15/07/2017	01-09-17
433	2031000963	Yasir Jan S/O Idris Khan	17102-9394848-206	GPS Mahmood Abad	121.61	Chindrodag	28077-80 Dated:15/07/2017	01-09-17

**TERMS & CONDITIONS**

- 1.) Their services shall be governed by the Khyber Pakhtunkhwa Civil servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, Posting & Transfer of Teachers, Lecturers, Instructors & Doctors) Regulatory Act, 2011 and such rules & regulations as may be issued from time to time by the Government.
- 2.) Their services shall be considered regular and they shall be eligible for pension / deduction of GP Fund in terms of the Khyber Pakhtunkhwa 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 favour of those, who have not taken over charge or has remained absent from duty or resign / terminated from service and also not for those who are under disciplinary proceedings.
- 7.) Their pay shall be released subject to verification of academic documents/testimonial from the concerned Board/University by the SDEO concerned.
- 8.) The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, (if any), who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.
- 9.) The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous official in such service or cadre.
- 10.) Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employees older in age shall rank senior to the younger one.

(SIRAJ MUHAMMAD)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAZZA

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

- 1. Copy forwarded for information to the:-
- 1. Director, Deptt. Khyber Pakhtunkhwa Peshawar.
- 2. District Education Officer, Charsadda
- 3. Deputy Commissioner, Charsadda
- 4. District Muzumzal Officer, Muzumzal
- 5. S.O. Charsadda
- 6. S.O. Muzumzal
- 7. S.O. Charsadda
- 8. District Education Officer, Charsadda
- 9. Official File
- 10. My file

*(Signature)*  
12/03/2018  
Dy: DISTRICT EDUCATION OFFICER



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) ERSE CHARZADDA

091-9220411 emischarsnada@webop.c.gov

16  
SKE

**OFFICE ORDER**

Consequent upon recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.2412-0512 / Promotion / Estab Dated Peshawar the 21/01/2013, the following Primary School Teachers (BPS-12) are hereby promoted to the post of SPST (BEC-14) (Rs.15180-1170-50280) 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 immediate effect and further posted in the school noted against each

SR	NAME	PRESENT SCHOOL	POSTED AT	REMARKS
1	SHER MUHAMMAD KHAN	GPS GARDERI BALA	GPS PALAY DOBANDI	AVP
2	MINHAJ ULLAH	GPS AMBA DHERI NO.2	GPS AMBA DHERI NO.2	AVP
3	MOJIB ALI AMAN	GPS CHEENA	GPS CHEENA	AVP
4	ZUBAIR	GPS PLA DHERAI	GPS PLA DHERAI	AVP
5	ADNAN	GPS KHULY	GPS KHULY	AVP
6	FAZAL MANAN	GPS KHAT KILLI SHOLGARA	GPS KHAT KILLI SHOLGARA	AVP
7	ABID QAYUM	GPS MALIK ABAD	GPS MALIK ABAD	AVP
8	IFTIKHAR ULLAH	GPS MARCHAKI	GPS MARCHAKI	AVP
9	MUSLIM SHAH	GPS INAM KILLI	GPS LANDAI SHAH	AVP
10	MUHAMMAD YOUSAF	GPS KULA DHER NO.1	GPS KULA DHER NO.1	AVP
11	ASLAM KHAN	GPS KHORA ABAD	GPS KHORA ABAD	AVP
12	AKHTAR ALI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	AVP
13	RIZAM ULLAH	GPS ISLAM ABAD DARGAJ	GPS ISLAM ABAD DARGAJ	AVP
14	NAJEM JAN	GPS KASS KOROONA	GPS KASS KOROONA	AVP
15	HASIR KHAN	GPS KHISRO KHAN KILLI	GPS SHAHNAWAZ KILLI	AVP
16	TRAWAT SHAH	GPS MANDEZAI	GPS MANDEZAI	AVP
17	MUHAMMAD KHALID	GPS STATION KOROONA	GPS GHULAN FARID KILLI	AVP
18	WAJID ULLAH	GPS PALOSA JADEED	GPS PALOSA JADEED	AVP
19	MUHAMMAD ISHTIAQ	GPS MERA SHAKH NO.8	GPS BEHLOLA	AVP
20	ABDUL MUSAWIR	GPS ANGAR KOROONA	GPS ANGAR KOROONA	AVP
21	SHER ALI	GPS KANGRA	GPS KANGRA	AVP
22	SABIR SHAH	GPS ZUHRAB GUL KILLI NO.1	GPS ZUHRAB GUL KILLI NO.1	AVP
23	SHEHEN GHAYAS KHAN	GPS PARAD NISATTA	GPS PARAD NISATTA	AVP
24	MUHAMMAD SHOAB	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	AVP
25	SHAHID KHAN	GPS MIAN SAHIB GUL KILLI	GPS MIAN SAHIB GUL KILLI	AVP
26	JAYVAD ALI	GPS KHUBAI	GPS KHUBAI	AVP
27	ZULFIQAR ALI	GPS CHAMYARAN	GPS CHAMYARAN	AVP
28	NAYAN ELAHI	GPS AJOON KILLI	GPS AJOON KILLI	AVP
29	MUHAMMAD SHAH	GPS RIZWAN ABAD	GPS RIZWAN ABAD	AVP
30	YASIR KHAN	GPS INAM KILLI	GPS INAM KILLI	AVP
31	ZUBAIR KHAN	GPS SHAHBAZ KHAN	GPS SHAHBAZ KHAN	AVP

32	FAZAL AAMIN	GPS EWAS KILLI	GPS EWAS KILLI	A.V.P
33	ISHTIAQ AHMAD	GPS RASOOL KHAN KILLI	GPS RASOOL KHAN KILLI	A.V.P
34	MUNAD ALI	GPS PAINDA KHEL TARNAB	GPS PAINDA KHEL TARNAB	A.V.P
35	MUHAMMAD MIRAN	GPS SHEIKH MUNAF KILLI	GPS SHEIKH MUNAF KILLI	A.V.P
36	ANWAR ZEB	GPS INZAR KILLI	GPS INZAR KILLI	A.V.P
37	SHAH AKWAR	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	A.V.P
38	KHALIL ULLAH	GPS UTMANZAI NO.3	GPS UTMANZAI NO.3	A.V.P
39	NOOR ULLAH JAN	GPS GHURMBAK- NO.1	GPS GHURMBAK- NO.1	A.V.P
40	MUHAMMAD ISMAIL SHAHID	GPS TANGI NO.3	GPS TANGI NO.3	A.V.P
41	MUHAMMAD IZHAR	GPS HASSANZAI	GPS HASSANZAI	A.V.P
42	SHAKIL AHMAD	GPS KARIM BANDA	GPS SHAKOOR	A.V.P
43	MIRZA ALI KHAN	GPS DALAZAK NO.1	GPS DALAZAK NO.1	A.V.P
44	ROSHAN KHAN	GPS ALI JAN KILLI	GPS ALI JAN KILLI	A.V.P
45	MOAZALI JAN	GPS QAZI KHEL-2	GPS QAZI KHEL-2	A.V.P
46	BAKHT TAL GUL	GPS DHERAI KOR: KATOZAI	GPS DHERAI KOR: KATOZAI	A.V.P
47	REHMAN ULLAH	GPS OCHA WALA-NO.1	GPS OCHA WALA-NO.1	A.V.P
48	AMROOZ KHAN	GPS LANDI ROAD	GPS LANDI ROAD	A.V.P
49	ADNAN HUSSAIN	GPS GONDA	GPS GONDA	A.V.P
50	MUHAMMAD YASIR	GPS ODIGRAM	GPS ODIGRAM	A.V.P
51	INAMUL HAGSAN	GPS KULA DHER NO.1	GPS KULA DHER NO.1	A.V.P
52	UMAR GUL	GPS AZIZ ABAD NO.2	GPS AZIZ ABAD NO.2	A.V.P
53	SHAH AYAZ UDDIN	GPS RAJJAR NO.1	GPS RAJJAR NO.1	A.V.P
54	MUHAMMAD ASMA	GPS KOTAK	GPS KOTAK	A.V.P
55	WAQAR ALI SHAH	GPS UMARZAI NO.1	GPS UMARZAI NO.1	A.V.P
56	MARIAN ALI	GPS SHABRA NO.1	GPS SHABRA NO.1	A.V.P
57	NASEEM KHAN	GPS MIRZAI	GPS MIRZAI	A.V.P
58	ZIA RAFIQ	GPS KATOZAI NO.1	GPS KATOZAI NO.1	A.V.P
59	SHAHID ALI	GPS OLDAR GARHI	GPS CHEENA	A.V.P
60	IRSHAD ALI	GPS DALARY	GPS DALARY	A.V.P
61	MAJID KHAN	GPS ARAT KOROONA	GPS ARAT KOROONA	A.V.P
62	SHAH KHALID	GPS MATHRA QADEEM	GPS MATHRA QADEEM	A.V.P
63	MUDHITAR ULLAH	GPS ISLAM ABAD DOBANDI	GPS ISLAM ABAD DOBANDI	A.V.P
64	TAHIR ALI SHAH	GPS SHAKAR DHAND	GPS HIGHAT ABAD	A.V.P
65	WASIQ JAN	GPS UMARZAI- NO.2	GPS UMARZAI- NO.2	A.V.P
66	GUL NAJ KHAN	GPS KODAI NO.1	GPS KODAI NO.1	A.V.P
67	MUHAMMAD ALI	GPS NAHAQI	GPS NAHAQI	A.V.P
68	QASIR ALI	GPS MUHAMMAD NARI	GPS MUHAMMAD NARI	A.V.P
69	IRFAN ULLAH	GPS ZARIN ABAD	GPS ZARIN ABAD	A.V.P
70	MUSAF KHAN	GPS RUSTAM KHAN KILLI	GPS RUSTAM KHAN KILLI	A.V.P
71	MUHAMMAD DAWOOD KHAN	GPS TANGI NO.1	GPS TANGI NO.1	A.V.P
72	FAWAD AHMAD	GPS JALAL KILLI-2	GPS JALAL KILLI-2	A.V.P
73	SHAHID KHAN	GPS SHAH AFZAL ABAD	GPS SHAH AFZAL ABAD	A.V.P
74	ALAM ZEB KHAN	GPS HAJI ABAD UMARZAI	GPS HAJI ABAD UMARZAI	A.V.P
75	ALI GOUHAR	GPS MEHMOOD ABAD SKF	GPS MEHMOOD ABAD SKF	A.V.P
76	ZAKIR ULLAH	GPS KODAI NO.1	GPS KODAI NO.1	A.V.P

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122	WISAL AHMAD	GPS HASSAN GUL KORONA	GPS HASSAN GUL KORONA	A.V.P
123	RAHAM SHID KHAN	GPS KRAPA MUHAMMAD KHAN	GPS KRAPA MUHAMMAD KHAN	A.V.P
124	SHAMSUL HAQ	GPS DAZ MIAN KILLI	GPS DAZ MIAN KILLI	A.V.P
125	SHERBAZ KHAN	GPS SPINKAI NO.2	GPS SPINKAI NO.2	A.V.P
126	SYED ZIAUDDIN BAO SHAH	GPS DARYAB KORONA	GPS DARYAB KORONA	A.V.P
127	DAWOOD MASOOD	GPS KALYAB	GPS KALYAB	A.V.P
128	MUHAMMAD ADIL JAN	GPS BOSA KHIL- NO.2	GPS BOSA KHIL- NO.2	A.V.P
128	NUSRAT ALI	GPS ISLAM ABA CHO	GPS ISLAM ABA CHO	A.V.P
130	MOHIB ULLAH	GPS ATTAKI NO.2	GPS ATTAKI NO.2	A.V.P
131	SAYYED MASOOD AHMAD	GPS ATTAKI NO.2	GPS ATTAKI NO.2	A.V.P
132	HAZ ALI KHAN	GPS ATTAKI NO.3	GPS ATTAKI NO.3	A.V.P
133	ZAFAR KHAN	GPS SHABQADAR FORT	GPS SHABQADAR FORT	A.V.P
134	ABDUR REI JAN	GPS SADAR GARNI-NO.3	GPS SADAR GARNI-NO.3	A.V.P
135	TARIQ JAN	GPS ATTAKI NO.3	GPS ATTAKI NO.3	A.V.P
136	ZAHHEER ABBAS	GPS SARDAR GAHRI	GPS SARDAR GAHRI	A.V.P
137	SADEEQ ULLAH	GPS KODAI NO.2	GPS KODAI NO.2	A.V.P
138	HSAN ALI	GPS ATTAKI NO.3	GPS ATTAKI NO.3	A.V.P
139	MUSTAFA ZEB	GPS MIAN KILLI	GPS MIAN KILLI	A.V.P
140	ABDULLAH KHAN	GPS ZARWAR KHAN KOR	GPS ZARWAR KHAN KOR	A.V.P
141	NAZ MUHAMMAD	GPS MATHRA NEW	GPS MATHRA NEW	A.V.P
142	NOOR-UL-ISLAM	GPS DARGAI	GPS DARGAI	A.V.P
143	MEER ALAM	GPS HAMISH GUL KILLI	GPS HAMISH GUL KILLI	A.V.P
144	TLA MUHAMMAD	GPS HAMISH GUL KILLI	GPS HAMISH GUL KILLI	A.V.P
145	SHAH SAUD	GPS SHEIKHANO KORONA	GPS SHEIKHANO KORONA	A.V.P
146	MAJZOOR KHAN	GPS AKHONZADGON	GPS AKHONZADGON	A.V.P
147	UBAID ULLAH JAN BACHA	GPS PRANG NO.3	GPS PRANG NO.3	A.V.P
148	NIHAR AHMAD	GPS KHAT KILLI PRANG	GPS KHAT KILLI PRANG	A.V.P
149	HSAN MUHAMMAD	GPS KODAI SARDARYAB	GPS KODAI SARDARYAB	A.V.P
150	MAZULLAH KHAN	GPS HASSAN ABAD	GPS HASSAN ABAD	A.V.P
151	MAQSOOD JAN	GPS GUL ABAD MERA	GPS GUL ABAD MERA	A.V.P
152	MUHAMMAD FAROOD	GPS ZAHID ABAD	GPS ZAHID ABAD	A.V.P
153	MUHAMMAD SHOAB	GPS ABAZAI	GPS ABAZAI	A.V.P
154	JAUHAR UDDIN	GPS MUSLIM ABAD	GPS MUSLIM ABAD	A.V.P
155	INAYATUR RAHMAN	GPS HASSAN ABAD	GPS HASSAN ABAD	A.V.P
156	JEHAN ZEB KHAN	GPS CHANCHAND KHAT	GPS CHANCHAND KHAT	A.V.P
157	KASHIF KHAN	GPS GANJI DAG NO.1	GPS GANJI DAG NO.1	A.V.P
158	SANI RAHMAN	GPS LANDI SHAH	GPS LANDI SHAH	A.V.P
159	GULAB NOOR	GPS QAZI SERAI	GPS GANDHERI PAYAN NO.2	A.V.P
160	ANWAR UL HAQ	GPSTARNAB SKF	GPSTARNAB SKF	A.V.P
161	HIMAYAT ULLAH	GPS DAMAN BATTAGRAIM	GPS DAMAN BATTAGRAIM	A.V.P

**TERMS & CONDITIONS:**

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. 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.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-Seniority on lower post will remain intact.

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6. No TA-DA is allowed for joining their duty.
7. They will give an undertaking to this effect to be recorded in their service books.
8. No application for any change regarding Posting/Transfer shall be entertained.

**ADJUSTMENT**

Adjustment/transfer of the following teachers is also hereby ordered on their own pay & scale in the schools mentioned against each in the interest of public service with immediate effect.

S.NO	NAME & DESIGNATION	PRESENT SCHOOL	POSTED AT	REMARKS
1	Riaz Ali SPST	GPS Kass Koroon	GPS Tala Shah	Single teacher school
2	Khurshad Alam SPST	GPS Gul Shah Killi	GPS Bari Band	Adjusted being 1/plus
3	Jawad Khan SPST	GPS Kagan	GPS Safo Bari Band	Adjusted being 1/plus
4	Abdul Bari Jan SPST	GPS Ghulam Farid Killi	GPS No.1 Sedar Garhal	N.Basis
5	Muhammad Sajjad SPST	GPS Ghundal Koroon	GPS Banda Rashakai	Adjusted being 1/plus
6	Muslim Khan SPST	GPS Mirza Dher No.1	GPS Hassanzal	N.Basis
7	Bahar Rahman SPST	GPS Raif Ullah Koroon	GPS Bachyano Killi	N.Basis
8	Misar Ali SPST	GPS Landi Shah	GPS Arat Koroon	Being (Disable)
9	Zahir Ullah SPST	GPS Shabara No.1	GPS Sukkar	N.Basis
10	Muhammad Zahoor SPST	GPS Shah Nawaz Killi	GPS Behlola Bela	N.Basis
11	Aziz ur Rahman SPST	GPS Arim Gul Man Killi	GPS Sati Abed	N.Basis
12	Huweib Akhter SPST	GPS Khan Pahal	GPS Gond	N.Basis
13	Jahan jahan Pst	GPS Nizamul Islam	GPS Shakh Nji	N.Basis
14	Abdur Rahman SPST	GPS Kinkar Killi No.2	GPS Carbi Hassan Gul	N.Basis

**NOTE:-**

- \* No TA, DA is allowed
- \* Charge report should be submitted to all concerned

(USMANGHIR KHAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endst: No. 5420-5602 / P.No. (Promotion 2020) / Dated 19/10/2020

- Copy for information to the:
1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
  2. Deputy Commissioner Charsadda.
  3. District Accounts Officer Charsadda.
  4. District Monitoring Officer (IMU) Charsadda.
  5. Sub-Divisional Education Officer (Male) Charsadda.
  6. Sub-Divisional Education Officer (Male) Tangi.
  7. Sub-Divisional Education Officer (Male) Shabqadar.
  8. Official concerned.
  9. Office file.

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

To

THE DISTRICT EDUCATION OFFICER (MALE)  
District Charsadda.

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.

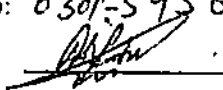
Obediently Yours

Name: ALI GAUHAR

Designation: SPST

School: GPS Mahmood Abad sharsadda

Contact No: 0301-5956703

Signature: 

Date: 20/04/2024

23-04-24

Handwritten notes in Urdu script, including the word "کتاب" (book).

Main body of handwritten Urdu text, appearing to be a list or notes related to books or documents.

کتاب

Handwritten text at the bottom of the page, including circled numbers 21 and 22.



22/11/2014 تاریخ

مقامی حکومت کے لیے درخواستیں

میں

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

درج ذیل بات پر غور کیا گیا ہے۔

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

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میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

22

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر

میں سے ملنے والی درخواستوں کو مدنظر رکھ کر



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

ABDUL MUSAWIR V/S EDUCATION DEPTT.

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5.	Service Book	D	10-17
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APPELLANT

Through:



MUHAMMAD MAAZ MADNI,

ADVOCATE HIGH COURT, PESHAWAR

KHATTAK LAW ASSOCIATES,

Juma Khan Plaza, Warsak Raod, Peshawar

0333-9313113, 0345-9090737

muhammad.m3adv@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

ABDUL MUSAWIR s/o Muhammad Ali, SPST (BPS-14),  
Govt. Primary School, Angar Kali, Charsadda,  
r/o Amir Abad, PO Rajjar, Tehsil & District Charsadda.

APPELLANT

VERSUS

1. THE DIRECTOR EDUCATION, Khyber Pakhtunkhwa,  
near Govt. Hasnain Shaheed High School, Firdous, Peshawar.
2. THE DISTRICT EDUCATION OFFICER,  
District Charsadda.
3. THE ACCOUNTANT GENERAL, KHYBER PAKHTUNKHWA,  
Fort Road, Peshawar Cantt.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST  
THE INACTION OF THE RESPONDENTS BY NOT  
ALLOWING INCREMENT FOR THE YEAR 2014 & ALSO NO  
RELEASING OUTSTANDING SALARIES FOR THE MONTH  
OF THE JUNE, JULY & AUGUST 2014 AND AGAINST  
APPELLATE ORDER DATED 16-09-2021 (Communicated to the  
appellant through register post on 21-09-2021) WHEREBY THE  
DEPARTMENTAL APPEAL DATED 09-07-2021 OF THE  
APPELLANT WAS REGRETTED ON NO GOOD GROUNDS

PRAYER:

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  
month of June, July & August 2014 may very kindly be  
declared illegal and the respondents may kindly be directed  
to allowing increment for the year 2014 with all back benefits  
and also release the outstanding salaries for the month of  
June, July & August 2014. Any other remedy which this  
august Tribunal deems appropriate that may also be awarded  
in favor of the appellant.

*Respectfully Sherveth,*

FACTS:

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

APPEAL NO. 7597 /2021  
20/11/21

1. That appellant is the employee of the respondent Department and was initially appointed as Primary School Teacher (PST) (BPS-12) on adhoc basis after fulfilling all the legal and codal formalities required for the post vide order dated 31-05-2014.

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

2. That the appellant after receiving the appointment order dated 31-05-2014 submitted his arrival report and took over the charge of the post assigned in the appointment order on 31-05-2014 and made entry in the attendance register of the school since then the appellant is working quite efficiently, whole heartedly with full devotion and upto the entire satisfaction of his high ups.

Copy of Charge Report dated 31.05.2014 & Attendance Register is attached as Annexure ..... B & C.

3. That service book of the appellant was also prepared and necessary entry was made therein in the service book from the date of initial appointment till date.

Copy of Service Book are attached as Annexure ..... D.

4. That service of all the adhoc teachers were regularized vide Regularization Act of 2017 and accordingly the services of the appellant was also regularized from the date of appointment vide order dated 12-03-2018, the entry of which was properly incorporated on page-7 of the service book already annexed above as annexure-D.

5. That presently the appellant is working as Senior Primary School Teacher (BPS-14) as in the year 2020 the appellant is promoted from the post of Primary School Teacher (BPS-12) to the post of Senior Primary School Teacher (BPS-14) vide order dated 19-05-2020, at serial no. 20, the entry of which has also been made in the service book on page-09 of the service book attached at annexure-D.

6. That appellant was 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 & August 2014 was not released for which the appellant made several request before the respondents by knocking the doors of various forum and accordingly the fixation party of

ATTESTED

  
Name of the official  
Designation  
Institution

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.

Copy of Pay Rolls are attached as Annexure ..... E.

7. That the appellant feeling aggrieved from the inaction of the respondents by not allowing increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014, the appellant file Departmental Appeal dated 09-07-2021 before the competent authority which was rejected vide appellate order dated 16-09-2021 on no good ground and the same is communicated to the appellant through registered post on 21-09-2021.

Copy of Departmental Appeal dated 09.07.2021 & Appellate Order Dated 16.09.2021 is attached as Annexure ..... F & G.

8. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others:

GROUND:

- A- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of Law and is liable to be struck down.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules 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 appellant has properly submitted his charge report & made attendance in the attendance register of the school on 31-05-2014 and as such the appellant has spent 180 days on 01<sup>st</sup> December that entitles the appellant for the annual increment of the year 2014.
- D- That act of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly

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salary for the month of June, July & August 2014 is against the prevailing Law & Rules.

- E- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973, according to which:  
*the state is bound to eliminate disparity in the income and status of individuals including persons in the various services of Pakistan.*  
thus in light of the above the respondents are duty bound to release the annual increment for the year 2014 as well as the monthly salaries for the month of June, July & August 2014.
- F- That, the respondents acted in arbitrary and mala fide manner while illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014.
- G- That act & omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing the monthly salary for the month of June, July & August 2014 is nothing but depriving the appellant from legal right of livelihood.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.


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

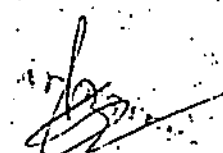
Dated: 15-10-2021

APPELLANT

  
ABDUL MUSAWIR

Through:

  
MUHAMMAD MAAZ MADNI  
Advocate High Court, Peshawar

  
Advocate  
High Court, Peshawar

(28)

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CERTIFICATE

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

  
ADVOCATE

AFFIDAVIT

I, Mr. ABDUL MUSAWIR s/o Muhammad Ali, 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  
17/01-3401857-5

NOTE:

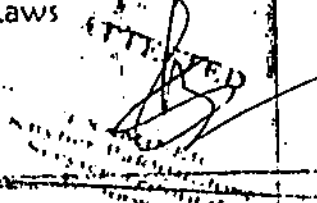
Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.

  
ADVOCATE

LIST OF BOOKS:

1. Constitution of Pakistan, 1973.
2. Service Laws
3. Other relevant case Laws







**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 Elemer .. 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

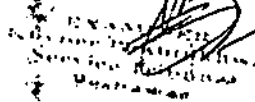
**JUDGMENT**

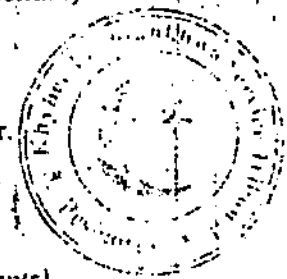
**RASHIDA BANO, MEMBER (J)** The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

"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







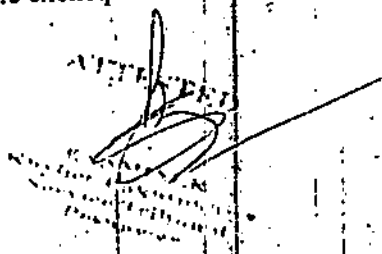
(31)

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.




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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 6<sup>th</sup> day of November, 2023.*

  
(MUHAMMAD AKBAR KHAN)  
Member (E)

  
(RASHIDA BANO)  
Member (J)

  
30/7/24


Date of Presentation of Application 30/7/24  
 Number of Words 7-P  
 Copying Fee 35/-  
 Urgent 9/-  
 Total no/-  
 Name of Copyist \_\_\_\_\_  
 Date of Completion of work 30/7/24  
 Date of Delivery of Copy 30/7/24


**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 6<sup>th</sup> day of November, 2023.*

  
(Muhammad Akbar Khan)  
Member (E)

  
(Rashida Bano)  
Member (J)

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To

The Director Education  
Elementary and Secondary Education KP Peshawar.

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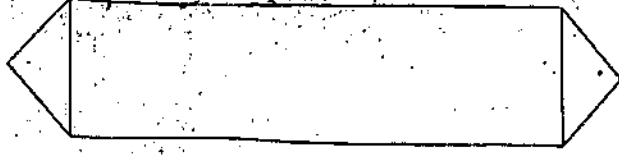
Departmental Appeal

- i. The Appellants are the employee of the education Department, and were initially appointed as Primary School Teacher PST BPS-12 on ADHOC Basis after fulfilling all the legal and codal formalities required for the post under the law and Rules Regulation.
- ii. Appellants after scrutiny and through proper channel by the Departmental Selection Committee DSC Under the supervision of DEO Male and other respected members of the committee appointed the appellants as primary school teacher PST BPS-12 on dated 31-05-2014. (Copies of Appointment Order dated 31-05-2014 is attached)
- iii. the DEO has issued the appointments orders for the post of PST to all candidates, and when all the candidates received the appointment orders on dated 31-05-2014, they submitted their arrival reports and took over Charge reports of the PST Posts assigned in the appointments orders on dated 31-05-2014. and made entry in the Attendance Register in the respective quarters school, since then the appellant working with full zeal and according to the efficiency and with full devotion satisfaction of the School Head.  
(Copies of Charge Reports dated 31-05-2014 and Register Attached)
- iv. Service Book of the Appellants also prepared and necessary entries were made therein in the service books from the date of initial appointments till date.  
(Copies of Service Books are attached )
- v. after satisfactory duties of all the Adhoc Teachers, the Govt of Kp through Regularization Act 2017 including appellant in the year 2018 all were regularized from the date of their initial appointments orders i.e 31-05-2014. The date which is 31-05-2014 is also mentioned in the heading of the regularization order of the Appellant as well as other candidates of PST, and the appellants were placed at Serial No-28. (Copy of Regularization Order attached)
- vi. Thereafter the appellant also promoted from the Post of PST BPS-12 to post of Senior Primary School Teacher SPST BPS-14 by the Departmental Promotion Committee DPC under the supervision of DEO and other officials, Vide order dated 19-05-2020.  
(Copy of Promotion orders attached)
- vii. the appellant facing huge financial discrepancy in monthly salaries due to the reasons that increment for the year 2014 were not allowed and also the salaries for month of June July and August 2014 not released for which the appellants made several visits and request verbally as well in shape of applications appeals etc. (Copies of application and appeals)
- viii. At last the SDEO Shabqadar send one letter to DEO Male Charsadda on dated 22/04/2024 for further action and process the applications, but despite applications reminders to department, they are not given positive response.  
(Copies of applications and SDEO Male letter to DEO attached)
- ix. the service appeal decision in the same nature issue and matter had come to the knowledge of the appellants in the title case ABDUL MUSAWIR VS EDUCATION DEPARTMENT service appeal No- 7597 of 2021, which was decided by the Hon'ble Bench Member of Service Tribunal Peshawar on dated 06-11-2023, whereas the same relief given and granted to one teaching cadre who also appointed with the appellant as PST and later he regularized and also promoted as SPST BPS-14  
(Copy of same identical nature case of service Tribunal dated 06-11-2023 attached )
- x. The appellants were also visited to concern quarter of accounts office to allow and include the same increment as well as salaries to appellant, but till date the same is neither included nor been allowed in the appellants salaries slip records.
- xi. Feeling aggrieved from the inaction of the DEO Office by not allowing the annual increment for year 2014 as well as the salaries of the month of June July and August 2014, the repeatedly visits applications requests and at last departmental and same identical nature service decided case/appeal, the DEO office on no grounds And without showing any reason were silent on the appellant request applications appeal, and having no other remedy except filing this departmental appeal for speedy remedy and justice.

APPELLANT

All Gauhar S/O Zameer Gul  
(SPST, BPS-14) Government Primary  
School Mahmood Abad, Shabqadar District  
Charsadda

بعدالت حبان حیدر صاحب اسم ولسن الطینول pp



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Appellate

2 منجانب

بنام علی کرم علی کرم

مورد  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے لیے جسے اللہ تعالیٰ حلیم ہے۔

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا عدسے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا ذکا لٹ نامہ لکھ دیا کہ سند ہے۔

علی کرم علی کرم

Accepted  
Received

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ماہ

الرقوم

العہدہ گواہ

مقام