


# FORM OF ORDER SHEET

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

Appeal No. 1914/2024


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. 1914 / 2024

Fathul Amin, VERSUS The District Education Officer (Male) District Charsadda.

INDEX SHEET

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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 1914 /2024

Fathul Amin S/O Roohul Amin (SPST, BPS-14) Government Primary School Haryana ,  
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 Appellant 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.

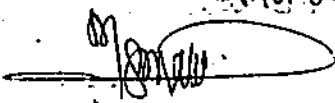
APPELLANT



Fathul Amin

Through Counsel

Muhammad Ismail



Advocate



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

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

Fathul Amin S/O Roohul Amin (SPST, BPS-14) Government Primary School Haryana ,  
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.

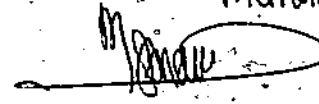
APPELLANT



Fathul Amin

Through Counsel

Muhammad Ismail  
Advocate





BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR

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

(16)

Fathul Amin S/O Roohul Amin (SPST, BPS-14) Government Primary School Haryana,  
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, Fathul Amin S/O Roohul Amin (SPST, BPS-14) Government Primary School Haryana,  
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

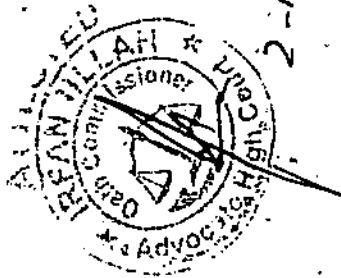


IDENTIFIED BY

Muhammad Ismail  
Advocate High Court

Through counsel

Ismail Khan  
Umar Khan  
Amjid Khan Mohmand  
Advocates High court Peshawar



Appointment Order PST (M) Ad hoc -Based

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAJDA

## 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
43/144	FATHUL AMIN 17101-9343851-3	GPS D. Sikandar Khan	Kangra	116.54

### 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, 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.

8 128

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

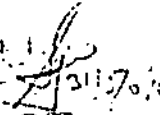
13. His appointment is made on School-based. He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualification, they may not be handed over charge.

(Siraj Muhammad)  
District Education Officer  
(Male) Charsadda

Endst: No: 4807-1958 /Dated: Charsadda the 31/5/2014

Copy forwarded for information and necessary action to the:

1. Director E&SE Deptt: Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Charsadda
3. District Accounts Officer Charsadda
4. SDEO (M) Charsadda
5. SDEO (M) Tangi
6. Official Concerned
7. M/File

  
District Education Officer  
(Male) Charsadda

17161-934234851-3

1/c

31/05/2014

amr

31/05/2014

HEAD MASTER  
Govt. Primary School  
Dhen Sikauder Khan Chd.

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31-05-2014

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSAADA**

**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. SO (S/F/E & SCD/3/2/2018 /SIT through NTS on Adhoc basis on Contract w.e.f. (31-05-2014 to 15-07-2017), are hereby regulated in BPS-12, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment as mentioned against each in the interest of public service.

Sl. No.	Rolling NTS	Name and Father Name	Cr. No.	Name in Urdu	Post	Appointing Order No. & Date of Issue	Cr. No.	Post	Appointing Order No. & Date of Issue
1	1580039	Muhammad Khalid S/O Tawal Ali	17101-6537002	محمد خالد	U/S	AD07-9538	132.89	Model	DA0631/05/2014
2	1580071	Mojib Ali S/O Saad Gul	17101-6766071	موجیب علی	U/S	AD07-9538	121.21	Model	DA0631/05/2014
3	1580014	Muhammad Saif S/O Mian Khairullah	17101-6640013	محمد سائیف	U/S	AD07-9538	116.33	Model	DA0631/05/2014
4	1581340	Muhammad Amin S/O Muzaffar	17101-6181153	محمد امین	U/S	AD07-9538	114.58	Model	DA0631/05/2014
5	1580163	Thomas Saif S/O Saad Saif	17101-611584	ٹوماس سائیف	U/S	AD07-9538	113.59	Model	DA0631/05/2014
6	1580041	Muhammad Shoaib S/O Muzaffar	17101-611583	محمد شویب	U/S	AD07-9538	113.59	Model	DA0631/05/2014
7	1580984	Shah Amir S/O Rahim	17101-698993	شاہ امیر	U/S	AD07-9538	112.44	Model	DA0631/05/2014
8	1580173	Muhammad Amin S/O Faraz Khan	17101-692691	محمد امین	U/S	AD07-9538	112.43	Model	DA0631/05/2014
9	1581110	Shah Khalid S/O Sajid	17101-642781	شاہ خالد	U/S	AD07-9538	119.3	Model	DA0631/05/2014
10	1580007	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	113.08	Model	DA0631/05/2014
11	1580895	Muhammad Ishaq S/O Muzaffar	17101-610591	محمد ایشاق	U/S	AD07-9538	113.08	Model	DA0631/05/2014
12	1580077	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	113.08	Model	DA0631/05/2014
13	1581037	Muhammad S/O Faraz Khan	17101-671634	محمد	U/S	AD07-9538	112.18	Model	DA0631/05/2014
14	1581564	Muhammad S/O Umaid Khan	17101-693889	محمد	U/S	AD07-9538	115.81	Model	DA0631/05/2014
15	1581254	Muhammad S/O Faraz Khan	17101-650736	محمد	U/S	AD07-9538	116.93	Model	DA0631/05/2014
16	1581213	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
17	1581214	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
18	1581215	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
19	1581216	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
20	1581217	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
21	1581218	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
22	1581219	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
23	1581220	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
24	1581221	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
25	1581222	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
26	1581223	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
27	1581224	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
28	1581225	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
29	1581226	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014
30	1581227	Muhammad S/O Muzaffar	17101-610613	محمد	U/S	AD07-9538	116.79	Model	DA0631/05/2014

*Muzaffar*

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16	156103	Shahid Ullah S/O Sufia Rabbani	17101-1017708-9	GPS Baiter	103.7	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
17	156103	Arshamullah S/O Haris Khan	17101-1017708-1	GPS Data Watch	103.25	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
18	156103	Abdullah S/O Zahid Gul	17101-1017708-7	GPS Muzaffargarh	103.8	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
19	156103	Amir Zaid S/O Umar Khan	17101-1017708-2	GPS Muzaffargarh	103.55	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
20	156094	Shahid Ali S/O Khan Sher	17101-1017708-3	GPS Muzaffargarh	103.96	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
21	156094	Muhammad Umar S/O Ali Rahman	17101-1017708-4	GPS Muzaffargarh	103.83	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
22	156094	Muhammad Khan S/O Faris Mulla	17101-1017708-5	GPS Muzaffargarh	103.51	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
23	156104	Shahid Khan S/O Gulzar Khan	17101-1017708-6	GPS Muzaffargarh	103.33	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
24	156094	Shahid Khan S/O Gulzar Khan	17101-1017708-1	GPS Muzaffargarh	103.84	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
25	156104	Shahid Ali S/O Faris Mulla	17101-1017708-2	GPS Muzaffargarh	103.63	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
26	156094	Shahid Ali S/O Faris Mulla	17101-1017708-3	GPS Muzaffargarh	103.82	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
27	156094	Faizul Akbar S/O Khan Ullah	17101-1017708-4	GPS Muzaffargarh	103.54	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
28	156104	Shahid Muhammad S/O Faris Mulla	17101-1017708-5	GPS Muzaffargarh	103.53	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
29	156104	Muhammad Khan S/O Gulzar Khan	17101-1017708-6	GPS Muzaffargarh	103.33	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
30	156104	Abdullah Khan S/O Mulla Abdul Samad	17101-1017708-7	GPS Muzaffargarh	99.35	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
31	156104	Syed Zahid Abbas S/O Syed Shamsul Shah	17101-1017708-8	GPS Muzaffargarh	96.43	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
32	156104	Bakht Taj Gul S/O Surtaj	17101-1017708-9	GPS Muzaffargarh	102.71	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
33	156104	Dr. Raza S/O Muhammad Raza	17101-1017708-10	GPS Muzaffargarh	103.06	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
34	156104	Shahid Ali S/O Faris Mulla	17101-1017708-11	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
35	156104	Zahid Ali S/O Faris Mulla	17101-1017708-12	GPS Muzaffargarh	103.53	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
36	156104	Amir Zaid S/O Umar Khan	17101-1017708-13	GPS Muzaffargarh	103.82	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
37	156104	Muhammad Khan S/O Faris Mulla	17101-1017708-14	GPS Muzaffargarh	103.64	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
38	156104	Muhammad Khan S/O Faris Mulla	17101-1017708-15	GPS Muzaffargarh	103.33	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
39	156104	Muhammad Khan S/O Faris Mulla	17101-1017708-16	GPS Muzaffargarh	103.48	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
40	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-17	GPS Muzaffargarh	103.32	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
41	156094	Abdullah Khan S/O Faris Mulla	17101-1017708-18	GPS Muzaffargarh	103.11	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
42	156104	Shahid Ali S/O Faris Mulla	17101-1017708-19	GPS Muzaffargarh	103.31	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
43	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-20	GPS Muzaffargarh	103.87	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
44	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-21	GPS Muzaffargarh	103.56	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
45	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-22	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
46	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-23	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
47	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-24	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
48	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-25	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
49	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-26	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
50	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-27	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
51	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-28	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
52	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-29	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
53	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-30	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
54	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-31	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
55	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-32	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
56	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-33	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
57	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-34	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013
58	156094	Yusuf Ahmad S/O Wazir Khan	17101-1017708-35	GPS Muzaffargarh	103.58	Muzaffargarh	4807-4958	Dated: 31/05/2014	01-09-14	2393-14078	Dated: 26/04/2013

7/11/14

- Copy forwarded for information to the:-
1. Director Ed&S Deptt. Khyber Pakhtunkhwa Feshawar
  2. District Nazim Charsadda
  3. Deputy Commissioner Charsadda
  4. District Monitoring Officer IML Charsadda
  5. SDCO (M) Charsadda
  6. SDCO (M) Tangi
  7. SDCO (M) Shogooda
  8. District Account Officer Charsadda
  9. Official concerned.
  10. Office file.

DISTRICT EDUCATION OFFICER  
MAHLE CHARADDIA

SIRAJ MUHAMMAD  
DISTRICT EDUCATION OFFICER  
MAHLE CHARADDIA

1. Their services shall be governed by the Khyber Pakhtunkhwa (Teachers, Lecturers, Inspectors & Doctors) Regulation, 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 certification of Government in terms of the Khyber Pakhtunkhwa Civil Services 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 post in respective service cadres.

6. The regularization will not be in favor of those who have not taken over charge of posts remained vacant from duty or resignation terminated from service and also not for those who are under disciplinary proceedings.

7. Their pay shall be reviewed subject to verification of academic documents/achievements from the concerned Universities by the SDCO concerned.

8. The employees whose services are regularized under the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regulation 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 Regulation of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. 1 of 2018) shall rank junior to the civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis in the commencement of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regulation of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. 1 of 2018) and shall also rank junior to each other in terms of seniority in the commencement of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regulation of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. 1 of 2018), irrespective of their actual date of appointment.

9. The seniority interest of the employees, whose services are regularized under this act, shall be the same as if they were in the same service as they were in before the regularization of their services in the case of two or more employees in the same service, provided that the regularization of their services shall be determined on the basis of their continuous affiliation in such service or cadre.

10. Their seniority shall be determined on the basis of their continuous affiliation in such service or cadre.

**TERMS & CONDITIONS**

Sl. No.	Name	Grade	Category	Age	Qualification	Date of Birth
427	Sayed Zahir S/O Ali Akbar	17102-939888	GPS Senior Tandi	16.54	Shogooda	27-02-1956
428	Nadeem Jan S/O Khan Ghader	17102-939888	GPS Senior No. 2	17.78	Tangi	28-03-2017
429	Muhammad Ali S/O Khan	17102-939888	GPS Senior No. 1	18.76	Tangi	28-03-2017
430	Muhammad Ali S/O Khan	17102-939888	GPS Senior No. 1	18.76	Tangi	28-03-2017
431	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
432	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
433	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
434	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
435	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
436	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
437	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
438	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
439	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
440	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
441	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
442	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
443	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
444	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
445	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
446	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
447	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
448	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
449	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017
450	Muhammad Zaid S/O	17102-939888	GPS Senior	19.99	Ummer	28-03-2017

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OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) E&SE CHARSADDA

001-9220451 emucharsadda@yahoo.com

13-L  
13

**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.2412-2542 / Promotion / Estab Dated Peshawar the 21/01/2013, the following Primary School Teachers (BFS-12) are hereby promoted to the post of SPST (BFS-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.

S#	NAME	PRESENT SCHOOL	POSTED AT	REMARKS
1	SHER MUHAMMAD KHAN	GPS GANDERI BALA	GPS PALAY DOBANDI	A.V.P
2	MINKHAJ ULLAH	GPS AMBA DHERI- NO 2	GPS AMBA DHERI- NO.2	A.V.P
3	ASIM ALI KHAN	GPS CHEENA	GPS CHEENA	A.V.P
4	ZUBAIR	GPS PLA DHERAI	GPS PLA DHERAI	A.V.P
5	ADNAN	GPS KHULY	GPS KHULY	A.V.P
6	FAZAL MANNAN	GPS KHAT KILLI SHOLGARA	GPS KHAT, KILLI SHOLGARA	A.V.P
7	ABID QAYUM	GPS MALIK ABAD	GPS MALIK ABAD	A.V.P
8	IFTIKHAR ULLAH	GPS MARCHAKI	GPS MARCHAKI	A.V.P
9	MUSLIM SHAH	GPS INAM KILLI	GPS LANDAI SHAH	A.V.P
10	MUHAMMAD YOUSAF	GPS KULA DHER NO.1	GPS KULA DHER NO.1	A.V.P
11	ASLAM KHAN	GPS KHORA ABAD	GPS KHORA ABAD	A.V.P
12	AKHTAR ALI	GPS ANGAR KOROONA	GPS ANGAR KOROONA	A.V.P
13	NIZAM ULLAH	GPS ISLAM ABAD DARGAI	GPS ISLAM ABAD DARGAI	A.V.P
14	NAEEM JAN	GPS KASS KOROONA	GPS KASS KOROONA	A.V.P
15	NASIR KHAN	GPS KHISRO KHAN KILLI	GPS SHAHNAWAZ KILLI	A.V.P
16	TILAWAT SHAH	GPS MANDEZAI	GPS MANDEZAI	A.V.P
17	MUHAMMAD KHALID	GPS STATION KOROONA	GPS GHULAM FARID KILLI	A.V.P
18	WAJID ULLAH	GPS PALOSA JADEED	GPS PALOSA JADEED	A.V.P
19	MUHAMMAD ISHTIAQ	GPS MERA SHAKH- NO.6	GPS BEHLOLA	A.V.P
20	ABDUL MUSAWIR	GPS ANGAR KOROONA	GPS ANGAR KOROONA	A.V.P
21	SHER ALI	GPS KANGRA	GPS KANGRA	A.V.P
22	SABIR SHAH	GPS ZUHRAB GUL KILLI NO.1	GPS ZUHRAB GUL KILLI NO.1	A.V.P
23	SHEHER GHAYAS KHAN	GPS PARAO NISATTA	GPS PARAO NISATTA	A.V.P
24	MUHAMMAD SHOAB	GPS ASHARA BATTAGRAM	GPS ASHARA BATTAGRAM	A.V.P
25	SHAHID KHAN	GPS MIAN SAHIB GUL KILLI	GPS MIAN SAHIB GUL KILLI	A.V.P
26	JAWAD ALI	GPS KHUBAI	GPS KHUBAI	A.V.P
27	ZULFIQAR ALI	GPS CHAMYARAN	GPS CHAMYARAN	A.V.P
28	KARAM ELAHI	GPS AJOON KILLI	GPS AJOON KILLI	A.V.P
29	MUDASSIR SHAH	GPS RIZWAN ABAD	GPS RIZWAN ABAD	A.V.P
30	TASIR KHAN	GPS INAM KILLI	GPS INAM KILLI	A.V.P
31	ZUBAIF KHAN	GPS SHAHBAZ KHAN	GPS CHANDAZ KHAN	A.V.P



NAME	GPS SHAH DHAND	GPS SHAH DHAND	AVP
1. JAWAID MUHAMMAD	GPS SHAH DHAND	GPS SHAH DHAND	AVP
2. USMAN ALI	GPS SHEIKH ABAD RAJJAR	GPS SHEIKH ABAD RAJJAR	AVP
3. WAZAR KHAN	GPS MALKA DHER	GPS MALKA DHER	AVP
4. FARUQ AMIN	GPS DHERI SHANDER KHAN	GPS DHERI SHANDER KHAN	AVP
5. MIAN ADAM SHAH	GPS AGRA BALA	GPS AGRA BALA	AVP
6. IKRAM ULLAH	GPS AMBA DHER NO 1	GPS AMBA DHER NO 1	AVP
7. ZAFAR ALI	GPS DOSEHRA-NO 3	GPS DOSEHRA-NO 3	AVP
8. ASIF SHAH	GPS SHALIMANO KILLI	GPS SHALIMANO KILLI	AVP
9. SHAD MUHAMMAD	GPS HARI ANA	GPS HARI ANA	AVP
10. NAEEM JAN	GPS YAKH KOHI	GPS YAKH KOHI	AVP
11. MUHAMMAD SHAHZAD KHAN	GPS KASS KOROONA	GPS KASS KOROONA	AVP
12. AZHAT HUSSAIN	GPS MARCHAKI-2	GPS MARCHAKI-2	AVP
13. IHSAN ULLAH ALIAS ASAD	GPS UMAR ABAD CHD	GPS UMAR ABAD CHD	AVP
14. ARSHAD KHAN	GPS KOTAK	GPS KOTAK	AVP
15. MUHAMMAD DEESHAN	GPS KHAT KILLI PRANG	GPS KHAT KILLI PRANG	AVP
16. NAMRAN ULLAH	GPS MALKA DHER	GPS MALKA DHER	AVP
17. RASOOL SHAH	GPS PRANG- NO 3	GPS PRANG- NO 3	AVP
18. MUHAMMAD AMIN	GPS AGRA BALA	GPS AGRA BALA	AVP
19. SHAH MUHAMMAD	GPS YAR JAN KOROONA	GPS YAR JAN KOROONA	AVP
20. ABDUR RAHMAN	GPS JAN ABAD	GPS JAN ABAD	AVP
21. SAIED KHAN	GPS MITTA MUGHAL KHEL	GPS MITTA MUGHAL KHEL	AVP
22. ASIF ULLAH	GPS DAULAT PURA	GPS GAGER	AVP
23. MUHAMMAD SAJJAD	GPS GHUNDAI KOROONA	GPS CHUNDAI KOROONA	AVP
24. DILAWAR SHAH	GPS BOSA KHEL PRANG	GPS BOSA KHEL PRANG	AVP
25. ISHTIAD AHMAD	GPS MIAN SAHIB GUL QALA	GPS DILDAR GARHI	AVP
26. ROOHUL AMIN	GPS DAGSHAMOZAI	GPS DAGSHAMOZAI	AVP
27. ATTA ULLAH NOOR	GPS NISHAN ABAD	GPS NISHAN ABAD	AVP
28. ZIA ULLAH	GPS INZER QALA	GPS INZER QALA	AVP
29. YASIR KHAN	GPS MANDANI	GPS MANDANI	AVP
30. NAZIR AHMAD	GPS MARDHAND NO -1	GPS MARDHAND NO.-1	AVP
31. OWAIS ULLAH	GPS SULAI KAMAR	GPS SULAI KAMAR	AVP
32. ZAINUL ABIDEEN	GPS SARKI TITARA-NO.1	GPS SARKI TITARA-NO.1	AVP
33. JAMIL MUHAMMAD KHAN	GPS TARIQ ABAD	GPS TARIQ ABAD	AVP
34. MUHAMMAD GULZAR	GPS SHAH DHAND	GPS SHAH DHAND	AVP
35. SHAHAB ALI	GPS GANGOO	GPS GANGOO	AVP
36. MANZOOR ALI	GPS GUJRANO KILLI	GPS GUJRANO KILLI	AVP
37. MAJID SHAH	GPS RHMAT ULLAH KOROONA	GPS RHMAT ULLAH KOROONA	AVP
38. AFTAB AHMAD	GPS CHITLA DHERI	GPS HAJI ABAD UMARZAI	AVP
39. ASFANDIYAR	GPS PRANG- NO 3	GPS PRANG- NO.3	AVP
40. ZAMDOOR AHMAD	GPS SHERPAO NO.1	GPS SHERPAO NO.1	AVP
41. FARHAD ALI	GPS KATIGAN	GPS KATIGAN	AVP
42. MUHAMMAD BASIR	GPS WARDAGA- NO.1	GPS WARDAGA- NO.1	AVP
43. ADNAN KHAN	GPS CHECK RAJJAR	GPS CHECK RAJJAR	AVP
44. KHAN MUHAMMAD	GPS RASHAKAI	GPS RASHAKAI	AVP
45. AMJID ALI	GPS DARGAI	GPS DARGAI	AVP

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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	Pir Ali SPST	GPS Khas Korona	GPS Tala Shah	Single teacher school
2	Ebushad Alam SPST	GPS Gul Shah Fili	GPS Bar Band	Adjusted being s/plus
3	Iqbal Hussain SPST	GPS Fagim	GPS Safo Bar Band	Adjusted being s/plus
4	Abdu. Pan Mah SPST	GPS Ghulam Farid Kili	GPS No 1 Sodar Garhat	N Basis
5	Muhammad Saad SPST	GPS Ghurdat Korona	GPS Banda Rashakai	Adjusted being s/plus
6	Muslim Khan SPST	GPS Mirza Eher No 1	GPS Hassanzai	N Basis
7	Bahar Rahman SPST	GPS Rah Ullah Korona	GPS Bachyano Kili	N Basis
8	Nisar Ali SPST	GPS Lari Shah	GPS Arat Korona	Being disable
9	Zahid Ullah SPST	GPS Sharara No 1	GPS Sukkar	N Basis
10	Muhammad Zahoor SPST	GPS Shan Nawaz Kili	GPS Behlola Bala	N Basis
11	Azeez Farooq SPST	GPS Azam Gul Mian Kili	GPS Satti Abad	N Basis
12	Husain Akhtar SPST	GPS Khan Jhel	GPS Gonda	N Basis
13	Shah Jinnat SPST	GPS Mirza Baba	GPS Sheh Jh Kili	N Basis
14	Abdur Rahman SPST	GPS Risadar Kili No.2	GPS Garhi Hameed Gul	N Basis

**NOTE:-**

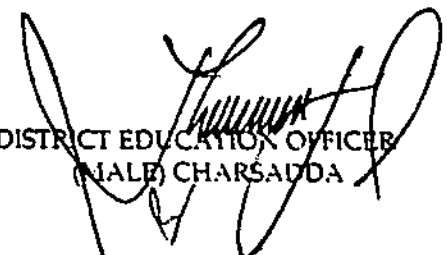
- \* No TA, DA is allowed
- \* Charge report should be submitted to all concerned

**(JEHANGIR KHAN)**  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAZZA

Endst: No 5420-5602 / F.No. (Promotion 2020) / Dated 19/05/2020

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 (DMO) 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) CHARSAZZA

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10

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/Sr.

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: FATHUL AMIN

Designation: SPST

School: GPS HARYAN

Contact No: 0316-9870185

Signature: [Signature]

Date: 22/04/2024

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Office of the Sub Divisional Education Officer  
(Male) Shabqadar Charsadda

No. 10021,



sdeopri@gmail.com

Dated: 22/4/2024

To

The District Education Officer  
(Male) Charsadda

**SUBJECT: APPLICATION FOR THE GRNAT OF INCREMENT FOR THE YEAR  
2014 AND SALARIES FOR THE MONTHS OF JUNE, JULY & AGUST  
2014**

Memo:

Enclosed please find herewith a self-explanatory applications along with other relevant documents of the following officials is submitted for your kind perusal and necessary action please.

Ser #	Name of Official	Designation	School Name
1	Tariq Jan	SPST	GPS No,3 Attaki
2	Sherbaz Khan	SPST	GPS, Hassanzai Shabqadar
3	Syed Zaheer Abbas	SPST	GPS Spinkai No,1 Shabqadar
4	Abdur Rafi Jan	SPST	GPS Katozai No.2.
5	Rahm Shid Khan	SPST	GPS Krpa Muhmmad Khan
6	Zia Rafiq	SPST	GPS, Katozai No.3.
7	Naseem Khan	SPST	GPS Mir Zai
8	Zubair Khan	SPST	GPS Shahbaz Khan Kor.
9	Mustafa Zeb	SPST	GPS, Mian killi Shabqadar
10	Gul Raj Khan	SPST	GPS, Kodai No.1
11	Sadeeq Ullah	SPST	GPS, Kodai No,2
12	Muhammad Sajjad	SPST	GPS, Banda Rashakai
13	Khan Muhammad.	SPST	GPS, Rashaki
14	Zakir Ullah	SPST	GPS, No1,Kodal
15	Shah Muhammad	SPST	GPS Shabaz Khan KiliH




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Office of the Sub Divisional Education Officer  
(Male) Shabqadar Charsadda

16	Ihsan Ali	SPST	GPS,
17	Muhammad Izhar	SPST	GPS, Hassanzai
18	Asif ullaah	SPST	GPS, Sandasar
19	Fathul Amin	SPST	GPS, Haryana
20	Tilawat Shah	SPST	GPS, No1, Sohta
21	Muhammad Asim	SPST	GPS-Haji AbadSreekh
22	Shah Khalid	SPST	GPS, Haji AbadSreekh
23	Syed Masood Ahmad	SPST	GPS,NO2 Attaki
24	Mohibullah	SPST	GPS.NO 2. Attaki
25	Bakht Taj Gul	SPST	GPS Kabaley Shabqadar
26	Syed Ziauddin Badshah	SPST	GPS Daryab Korona
27	Seeed Khan	SPST	GPS Matta Mughal Khel
28	Wasal Ahmiad SPST	SPST	Hassan Gul Korona
29	Sher Ali	SPST	GPS Kangra Nahaqqi
30	Muhammad Shoaib	SPST	GPS Ashara Battagram
31	Arshad Khan	SPST	GPS, Kotak
32	Adnan Hussain	SPST	GPS, Gondá

Encl: As Above

  
Sub Divisional Education Officer  
(Male) Shabqadar

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

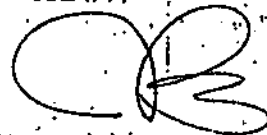
ABDUL MUSAWIR V/S EDUCATION DEPTT.

I N D E X

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	.....	1 - 5
2.	Appointment Order dated 31.05.2014	A'	6 - 7
3.	Charge Report dated 31.05.2014	B	8
4.	Attendance Register	C	9
5.	Service Book	D	10 - 17
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7.	Departmental Appeal dated 09.07.2021	F	20
8.	Appellate Order Dated 16.09.2021	G	21
9.	Wakalatnama	.....	22

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

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Page. | 1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

APPEAL NO. 7597 /2021

ABDUL MUSAWIR s/o Muhammad Ali, SPST (BPS-14),  
Govt. Primary School, Angar Kalfi, 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  
APPELATE 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 REGRETTEED 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 Sheweth,*

FACTS:

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

ATTESTED

EX-AMIN  
PESHAWAR

~~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

ATTACHED

*[Handwritten signature]*



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.

2020

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

ATTESTED

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

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- 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 earning of individuals including persons in the various service 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 malafide 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

EXAMINER  
Khyber Pakhtunkhwa  
Services Tribunal  
Peshawar

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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  
17101-3401857-5


NOTE:

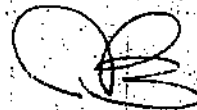
Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.

  
ADVOCATE

LIST OF BOOKS:

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

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal



**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 Elementar 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

EXAMINED  
BY THE  
SECRETARY

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6/11



R

to the post of Senior Primary School Teacher (BPS-14) vide order dated 12.03.2018. The appellant facing huge discrepancy in the monthly salary due the reason that increment for the year 2014 was not allowed and the salaries for the month of June, July and August 2014 was not released. Despite the factum of pay fixation party of respondent No.3 allowed the increment for the year 2014 but till date the same is neither been included nor been allowed in the salary of the appellant. Feeling aggrieved, he filed departmental appeal, which was rejected, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that appellant has not been treated in accordance with law and rules and respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973. He further argued that the act and omission of the respondents by illegally deducting annual increment for the year 2014 and not releasing salaries is against the law, facts, material available on record and norms of natural justice hence not tenable in the eye of law is liable to be struck down. He submitted that appellant has properly submitted his charge report and mark his attendance in the attendance register on 31.05.2014 and he is held entitled for annual increment for the year 2014.

5. Learned District Attorney contended that the appellant has been treated in accordance with law and rules. He further contended that initially the appellant was appointed on 31.05.2014, but the appointment order of the appellant and his colleagues were amended and in this regard a corrigendum was issued. The amended order directed the appointees to take charge from 01.09.2014, because of long summer vacations to save the public exchequer.

ATTENDED

CHIEF JUSTICE  
Sindh High Court  
Karachi

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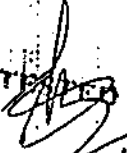
6. Perusal of record reveals that appellant was appointed as Primury School Teacher vide appointment order dated 31.05.2014 and it is admitted fact that appellant submitted his arrival report on the same day i.e 31.05.2014. He was regularized from the date of his appointment vide notification dated 15.03.2018. 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)

ATTORNEY  
  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar  
30/7/24

Date of Presentation of Application 30/7/24  
Number of Words 774  
Copying Fee 25/-  
Urgent 9/-  
Total no/-  
Name of Copyist \_\_\_\_\_  
Date of Completion of Copy 30/7/24  
Date of Filing of Copy 30/7/24

ORDER  
06.11.2023


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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)

To

The Director Education

Elementary and Secondary Education KP Peshawar.

(29)

(133)

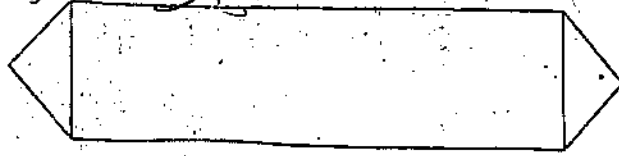
Departmental Appeal

- 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-37. (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

Fathul Amin S/O Roohul Amin  
(SPST, BPS-14) Government Primary  
School Haryana, Shabqadar District  
Charsadda





Appellant  
حناں حیدر

2 پنجاب  
فتح الامین بنام

موردہ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آنکہ

حناں حیدر  
احمد علی

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیرویں و جواب دہی وکل کاروائی متعلقہ  
آن مقام پر کیے محمد اسحاق علی صاحب نے تحریر کیا 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 درو پیدار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیرویں یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیرویں 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 باختیارات حاصل ہوں گے  
اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے مقدمہ کے  
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ پیرویں مذکور کریں۔ لہذا کالت نامہ لکھ دیا کہ سند ہے۔

فتح الامین و ہم دعویٰ الامین

Accepted  
Accepted

20  
محمد اسحاق علی

العہد گاہ العہد  
مقام