

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

C.M. No. \_\_\_\_\_/2024  
In  
Service Appeal No.857/2024

Syed Qasim Shah.....Appellant

**V E R S U S**

Govt of Khyber Pakhtunkhwa & Others  
.....Respondents

**I N D E X**

<b>S.No</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Application for additional documents		1-2
2.	Affidavit		3
3.	<b>Copies of relevant documents</b>		4-

Appellant  
Through



**Tariq Kamal**  
Advocate, High Court  
**Cell#0301-5932818**

Dated 05.08.2024

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

C.M. No. \_\_\_\_\_/2024  
In  
Service Appeal No.857/2024

Syed Qasim Shah.....**Appellant**

**V E R S U S**

Govt of Khyber Pakhtunkhwa & Others  
.....**Respondents**

**Application for place on file  
additional document in the above  
mentioned Service Appeal.**

**Respectfully Sheweth:**

**The petitioner humbly submits as under:-**

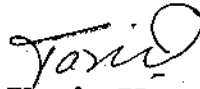
1. That the above titled Service Appeal is pending adjudication before this Honourable Court in which next date of hearing is 05.08.2024.
2. That the following additional documents accompanied herewith are necessary for just and proper disposal of the above titled Service Appeal, which was inadvertently not annexed with the main petition.
3. That there is no legal bar in bringing on record the document necessary for just conclusion of the case.

It is, therefore, most humbly prayed that on acceptance of this application, the above mentioned additional document may kindly be considered part and parcel of the above mentioned Service Appeal and same may kindly be include in main petition.



Appellant

Through



**Tariq Kamal**

Advocate, High Court

**Cell#0301-5932818**

Dated 05.08.2024

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

C.M. No. \_\_\_\_\_/2024  
In  
Service Appeal No.857/2024

Syed Qasim Shah.....**Appellant**

**VERSUS**

Govt of Khyber Pakhtunkhwa & Others

.....**Respondents**

**AFFIDAVIT**

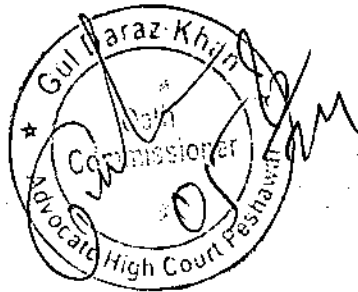
I, Tariq Kamal Advocate as per information of my client, do hereby solemnly affirm and declare on oath that the contents of the **Application** are true and correct and nothing has been concealed from this Hon'ble Court.

*Tariq*

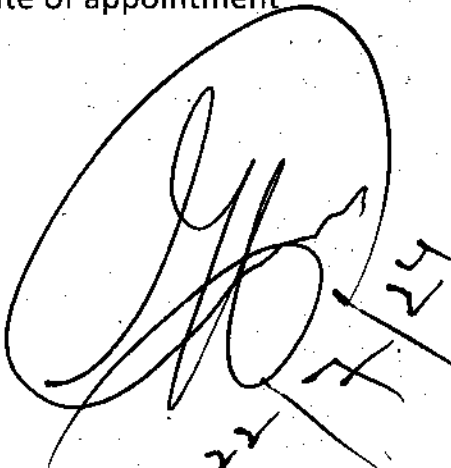
DEPONENT

CNIC#16102-7970384-9

Cell#0301-5932818



The amount of 5,231Pkr health (ROP) code 3195 is deducted from the BPS-17 EPI staff Regularized under the Ex FATA regularized Act from the date of appointment till date.



ACCOUNTS OFFICER  
O/o A.G. Khyber Pakhtunkhwa

## ARREAR CALCULATION

Month	Year	Fixed salary	BPS-17 (Project Salary)	Difference
August	2018	90,000	54185	35,815
September	2018	90,000	54185	35,815
October	2018	90,000	54185	35,815
November	2018	90,000	54185	35,815
December	2018	90,000	54185	35,815
January	2019	95000	54185	40,815
February	2019	95000	54185	40,815
March	2019	95000	54185	40,815
April	2019	95000	54185	40,815
May	2019	95000	54185	40,815
June	2019	95000	54185	40,815
July	2019	95000	55788	39,212
August	2019	95000	55788	39,212
September	2019	95000	55788	39,212
October	2019	95000	55788	39,212
November	2019	95000	55788	39,212
December	2019	95000	58088	36,912
January	2020	100000	58088	41,912
February	2020	100000	58088	41,912
March	2020	100000	58088	41,912
April	2020	100000	58088	41,912
May	2020	100000	58088	41,912
June	2020	100000	58088	41,912
July	2020	100000	58088	41,912
August	2020	100000	58088	41,912
September	2020	100000	58088	41,912
October	2020	100000	58088	41,912
November	2020	100000	58088	41,912

*Attested  
Taxi*

### ARREAR CALCULATION

Month	Year	Fixed salary	BPS-17 (Project Salary)	Difference
December	2020	100000	61538	38,462
January	2021	105000	61538	43,462
February	2021	105000	61538	43,462
March	2021	105000	61538	43,462
April	2021	105000	70281	34,719
May	2021	105000	70281	34,719
June	2021	105000	70281	34,719
<b>Grand Total</b>		<b>3,420,000</b>	<b>2,029,026</b>	<b>1,390,974</b>

*Attested  
ToxiD*