

Ziyad
Annex A
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Before the Hon'ble Peshawar High Court
Peshawar

Writ Petition no. 28
(Along-with interim Relief)



Mst. Sumbal Bibi
Widow of Shaheed Nawab Ali,
Resident of 2-Akbar town, Danish Abad
B.I.S.E, Peshawar Petitioner

Versus

- 1) Federation of Pakistan through Ministry of Finance, Pak Secretariat, Islamabad.
- 2) State Bank of Pakistan through its President, I.I Chandrigarh Road, Karachi.
- 3) President National Bank of Pakistan, Head Office NBP Building, I.I. Chundrigar Road, Karachi, Pakistan.
- 4) Assistant Vice President/ Manager HR National bank of Pakistan, Regional Office, House No. 611/ 612, Sector 'S', Sheikh Maltoon Town, ~~Peshawar~~ Mardan.
- 5) Manager National bank of Pakistan, Ghaley Branch, Swat.

..... Respondents

WRIT PETITION UNDER ARTICLE-199
Of the Constitution of Islamic Republic of Pakistan

Respectfully Sheweth:

1. That petitioner is law abiding/ peaceful citizen of Pakistan and permanent resident of Village/ Mohallah Mula Khel, P.O & Tehsil Bari Kot, District Swat and present residing at the address given in the heading of the titled petition.

(Copy of CNIC of petitioner is attached as Annexure "A")

2. That petitioner entered into valid contract of marriage with Shaheed Nawab Ali Khan S/o Abdul Mateen, having four minor children from the wedlock, consisting of two sons and two daughters, all are school going and reading in class VII, III, II & play group respectively.

(Copy of CNIC of Shaheed Nawab Ali Khan along-with Form-B Issued by NADRA are attached as Annexure "B")

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3. That Shaheed Nawab Ali (hereinafter referred to as deceased) was M.A (I.R) from University of Karachi, Sindh and on the strength whereof was appointed as Assistant in respondent bank, on 23.06.1996, evident from the Provident fund statement for the year 1997, issued by the national bank of Pakistan, after due process and fulfillment of all codal/ legal formalities.

(Copy of CV along-with testimonials and provident fund statement for the year 1997 are attached as Annexure "C" & "D" respectively)

WP1055P2017

Yusufzai Law Chamber (YLC)

- 2
- (6)
4. That deceased, due to work with zeal/ devotion and dedication, was promoted time to time, besides numerous ribbons of awards/ honors to his chest, and finally promoted to the rank of OG-I, in the year 2007.
(Copies of relevant documentary proof with regard to promotions, trainings, honors & awards are attached as Annexure "E")
5. That deceased, while posted as Manager, NBP Ghaley Branch, District Swat, was abducted by unknown persons, from his office/ place of duty, on 08.08.2010, at about 3 P.M, and petitioner, after getting knowledge through his colleagues, was assured his safe recovery and was told that the high ups of the Bank are on board and the issue would be settled very soon and further advised to do no effort for the recovery of the deceased but to manage/ look after his minor children to the best of her ability, accordingly she, being pardanasheen lady, obeyed the instructions/ directions and was hopeful about safe return of her husband and the sole breadwinner of the family.
6. That the NBP authorities, although advanced their full cooperation in the begging as stated in the preceding Para, but all their assurances proved mere empathetic statements as they gave cold shoulder to the matter, which compelled petitioner along with minor children to come out from her house and went from post to pillar for safe recovery of the deceased and to know reasons of abduction of her husband, the father of her four minor children, but all her cries fell on deaf ear.
7. That with the passage of harsh time, schooling of minor children of petitioner were badly suffered, rather their lives have become miserable and meeting the means became almost impossible, astonishingly the NBP authorities did not bother to at least look after the bereaved family of the deceased and to dig out the reasons of his abduction, being kidnapped while performing his official duty, on the other hand, respondents discouraged petitioner and her minor children and confined themselves to level serious type of allegations over the character of the deceased, which further enhanced her agonies and was wandering here and there in search of the only bread winner of her entire family but she found all the law enforcement agencies helpless to recover her innocent husband.
8. That surprisingly, she received dead body of the deceased on 22.10.2016, from DHQ Batkhela and was told that he died during custody of security agencies, in interment center at Malakand, on 14.10.2016, contents of the death certificate no. 2582 dated: 18.11.2016, issued by superintendent/ Incharge interment center Malakand are of paramount consideration for the proper assistance of this Hon'ble Court and just decision of the case, hence reproduced as under:

"It is certified, that internee Nawab Ali S/o Abdul Mateen was apprehended on 10.10.2010 and handed over to interment center on 18.10.2010. He was received on transfer into interment center Malakand on 14.10.2016.

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He was referred to DHQ, Hospital Batkhela for specialized treatment/ investigation on 15.10.2016. He was diagnosed with Pulmonary Tuberculosis and sent back to interment center along-with TB Medicine. TB medicine was given regularly to him by the medical staff.

On 21.10.2016, he was examined by the medical staff and there was no complaint. Late evening medical staff was informed that he is collapsed suddenly and on examined by the medical staff, he was found EXPIRED.

On 22.10.2016 his dead body was sent to DHQ hospital, Batkhela for autopsy and postmortem. After postmortem his dead body was handed over to his real brother for burial.

The postmortem report has yet not been received from the medical superintendent, DHQ Hospital Batkhela, for which he has been reminded twice vide this office no. 2470 dated: 26.10.2016 and no. 2563 dated: 16.11.2016.

This certificate is issued on the request of deceased brother and relatives."

(Copy of death certificate no. 2582 dated: 18.11.2016 along-with Postmortem report dated: 22.10.2016 are attached as Annexure "F")

9. That, though, the dead body of the deceased was buried but had left serious questions behind, pertaining to his abduction and subsequent recovery of dead body from interment center, as per the record of DHQ Batkhela, for instance, how come innocent husband of petitioner and father of four minor children, end up at interment center and done to death in active supervision of law enforcement agencies without ascertaining his guilt, either through proper trial or substantive investigation, even though, the National Bank of Pakistan had been and is still keeping mum, which has caused grave miscarriage of justice.

10. That all such stated above give rise to serious apprehensions about the role played by the National bank of Pakistan in the tragic incident, be it favorable or adverse, being later one more evident, which had not been taken place, had the bank authorities performed their obligations by probing into the abduction of their faithful employee and by not doing so they performed the job of a catalyst in his death and cannot be absolved from such omission, hence the instant Constitution Petition, as such like grievance petition dated: 13.12.2016, has already been overlooked by the respondents bank.

(Copies of grievance petition dated: 13.12.2016 along-with mailing receipts are attached as Annexure "G")

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11. That petitioner along-with four minor children of Shaheed Nawab Ali, seeking their appropriate remedy, for grant of status of "**Shaheed on duty**" and perks and privileges thereto, in accordance with the prevailing Government Policy, so as to prevent them from further deterioration and to enable the minors to get their primary education, being their fundamental right under Article 25-A of the Constitution of Islamic Republic of Pakistan, 1973 and to prevent

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petitioner from further exploitation and disgrace, and to enable her to survive honorably with her chin up, besides extending her treatment, in accordance with law and to be provided equal protection of law.

12. That any other ground with the permission of this Hon'ble Court will be taken at the time of arguments.

It is therefore, most humbly prayed, that on acceptance of instant Writ Petition, respondent bank may be issued appropriate writ by directing them to grant Status of 'Shaheed on Duty' along-with perks & privileges to the deceased, in accordance of the prevailing Government Policy, so as to enable the '4' minor children to get their Primary education, being their fundamental right, guaranteed under Article-25-A of the Constitution of Islamic Republic of Pakistan, 1973 and to prevent petitioner from further exploitation and disgrace and to enable her to survive honorably and to provide protection to her family, enshrined under Article-35 of the Constitution, in order to ensure fair play & justice.

Any other relief not specifically prayed and deemed appropriate to this Hon'ble Court in the circumstances of the case, may also be granted to petitioners.

INTERIM RELIEF:

BY way of interim relief, respondent bank may be directed to pay the outstanding salaries of the deceased to petitioner since his abduction till date and they may further be directed to pay his due salary until the titled petition is finally adjudicated upon.


Petitioner
through
Amin-ur-Rehman Yusufzai -
&
Kashif Shahbaz Khan
Advocates, Peshawar.

Dated: 04.03.2017

CERTIFICATE:

Prior to instant petition no such like petition has been filed by the petitioner, furthermore, instant one is a fit case to be placed before Hon'ble the Division bench of this Hon'ble Court.


Advocate

LIST OF BOOKS:

Constitution of Islamic republic of Pakistan, 1973
Case law as per need.


Advocate

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Yusufzai Law Chamber (YLC)

09 OCT 2017

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EXAMINER

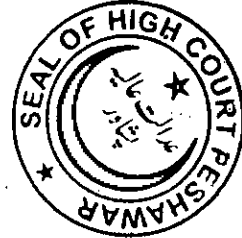
Peshawar High Court
Peshawar

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

W.P No.1055-P-2017.

Mst. Sumbal Bibi.
Vs.
Federation of Pakistan & others.

JUDGMENT



Date of hearing 24.05.2018.

Petitioner(s) by: *Aminur Rehman Josoof Zai Advocate*

Respondent(s) by: *Noor A. Khan Advocate
Mushtaq Khan D.H.*

IKRAMULLAH KHAN, J.- Through the instant

constitutional petition, petitioner has asked for an appropriate writ to be issued to the respondent

Bank as under:-

"On acceptance of instant writ petition, respondent bank may be issued appropriate writ by directing them to grant Status of "Shaheed on Duty" along with perks & privileges to the deceased, in accordance of the prevailing Government Policy, so as to enable the '4' minor children to get their primary education, being their fundamental right, guaranteed under Article 25-A of the Constitution of Islamic Republic of Pakistan, 1973 and to prevent petitioner from further exploitation and disgrace and to enable her to survive honorably and to provide protection to her family, enshrined under Article 35 of the Constitution, in order to ensure fair play & justice."

2. In essence, late husband of the petitioner was arrested and confined in Interment

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Center Malakand, who faced natural death on 22.10.2016 due to Pulmonary Tuberculosis as per the certificate issued by Incharge Interment Center, Malakand.

3. This question is out of discussion, herein, as to whether the detention of the husband of petitioner namely Nawab Ali was legal or illegal and as to whether the cause of death of the detainee was the same as certified by the concerned Incharge Interment Center, as the petitioner has not challenged the same before this Court.

4. The contention of the petitioner that her husband was abducted by some unknown person and respondent bank had not pursued the matter in accordance with rules of the bank is not tenable at all. Bank should not be held responsible for any legal action, commenced against an accused, by the law enforcing agencies, however, the record reveals that respondent bank had left no stone unturned to pursue to the matter of detention of his employee and in this respect the concerned Incharge of the respondent bank had well communicated the matters to concerned high authorities which could only be done by him.

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5. Petitioner had not approached within the required period to any competent Court of law, in matter of detention of her husband and such responsibility could not be converted to an employer.

6. The relief asked by the petitioner, against the respondent bank could not be processed as it was not the responsibility of the bank to pursue the case of his employee allegedly involved in some anti state activities, therefore, no relief could be granted to petitioner, as learned counsel did not point out any violation of law and rules, allegedly committed by the respondent bank. However, if petitioner does not accept the detention or cause of death of her husband, legal or otherwise, she may approach competent Court of law in this regard against the concerned authorities, if the same is permitted by law, and if she so advised.

7. Keeping in view the hardship facing by petitioner, this writ petition is dispose of in term that the respondent bank shall pay the family of the deceased Nawab Ali all his legal balance amount in

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Peshawar High Court

accordance with rules of the bank in this regard, if
not already paid.

Announced.
24.05.2018.

JUDGE

JUDGE

(DB)
Hon'ble Mr. Justice Ikramullah Khan
Hon'ble Justice Ms. Musarrat Hilali

No. 2804
Date of Presentation of Application 02/10/21
No of Pages 8-9
Copying fee 32/-
Total 32/-
Date of Preparation of Copy 02/10/21
Date of Delivery of Copy 02/10/21
Received By Rizad

[Signature]
CERTIFIED TO BE TRUE COPY
EXAM 2021
Peshawar High Court, Peshawar
Authorised under Article 87 of
The Qanun-e-Shariat, 1993
09 OCT 2021

Annex B
(13)

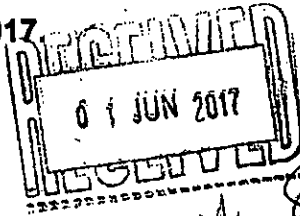
BEFORE THE PESHAWAR HIGH COURT PESHAWAR

In Res:Writ Petition No.1055-P/ 2017

Mst, Sumbal Bibi

Vs

Federation of Pakistan and others.



Petitioner

Respondents

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Respondent No-3

Through

NEELAM-A-KHAN

Advocate Supreme Court of Pakistan

Off; TF.15 Liberty Mall University

Road Peshawar.

Cell No- 03005955133

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In Res:Writ Petition No.1055-P/ 2017.

Mst, Sumbal Bibi

Petitioner

Vs

Federation of Pakistan and others.

Respondents

PREPLY ON BEHALF OF RESPONDENTS
NO- 3 to 5.

Respectfully Sheweth:

Respondents submit as under:

Preliminary Objections

1. That instant petition is not maintainable on bases of law and fact. Hence liable to be dismissed.
2. That petitioner has no cause of action against the replying respondents.
3. That petitioner has not approached replying respondents prior to filing instant petition.
4. That petitioner file constitutional petition before this H'onable court rather than availing adequate other legal forum.
5. That petitioner can avail Constitutional remedy when there is no other adequate remedy available to him.
6. That matter pertaining to factual controvercy,hence instant petition is not competent.
7. That there is no Malafide on part of replying respondents. Respondents have done all their efforts within ambit of their power and unable to go beyond their jurisdiction in present prevailing law and order situation throughout country.
9. That petition in hand is hit by principle of Laches/ limitation.
10. That petitioner bent upon to misguide this Honable court by presenting incorrect facts.
11. That indolent are not entitle to avail said remedy in accordance with law.

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12. That petitioner is trying to shift her burden on the replying respondents shoulders.

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On FACTS

- 1&2. Para No-1 & 2 need no reply for lack of knowledge.
3. Para No- 3 is correct to the extent that husband of the petitioner was OG-II at the strength of replying respondents.
4. Para No-4 needs no reply.
5. In reply to Para No- 5 , as matter of facts that initially two employees namely Nawab Ali OG-II/ Manager and Irshad Mehmood OG-III/ Cashier were posted at NBP Chungi Shamoza Branch ,Swat . Both of them were picked up by security forces on 24-09-2009 and shifted them to some unidentified location , later on cashier namely Irshad Mehmood was released by the security agency / forces dated 27-09-2009 while Nawab Ali was remained in their custody till 22-02-2010.

The replying respondents regularized the detention period of Nawab Ali by sanctioning 183 days privilege leave from 24-08-2009 to 22-02-2010 vide letter dated 02-05-2010.

Copy is attached as Annexure--- A

Thereafter husband of the petitioner was released by the security agencies so he was posted as OG-I/ Manager NBP Ghaligay Branch but he was again picked up by the security forces from his house at Barikot on 29-08-2010 at 9 pm. The respondents tried their best to find out cause/reason therefore contacted his family for and again but they were not available on given address as per bank record as well as locality in concern had no information regarding where about of the petitioner. Thus no one provided clear status of the case/ situation. Therefore in such circumstances the replying respondents approached Major General Ashfaq Nadeem General Officer Commanding 37 Division Malakand Top dated 30 Nov 2010 as well as the Commandant Shangla Task Force Circuit House Mingora vide letter dated 27 April 2011.

Copy is attached as Annexure--- B

But no response, there after initiated internal corresponding for sort out way regarding recovery of missing Nawab Ali, consulted their legal counsels also

Copy is attached as Annexure--- C

Replying respondents kept leave record accordingly as evident by letter dated 16th Dec 2011.

Copy is attached as Annexure--- D

After due consideration of all aspects of the case the competent authority decided to regularize detention period of 212 days from 10-08-2010 to 09-03-2011 as well as vacated appointment of the Nawab Ali w.e.f 10-03-2011 vide letter dated 31 August 2012,

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which had been conveyed to all quarter in concern including Ex-officer on available address on record.
Copies are attached as Annexure-- E, F

The Officer in concern has continuously been paid Monthly Salary and other emoluments till august 2012 which is evident by his pay slips. statement of account.
Copies are attached as Annexure-- G,H

6. Para No 6 is correct to the extent that replying respondents have done all possible efforts to sort out reason / cause for taking away the detune by the security force/agency , while rest of Para denied
7. In reply to Para No-7, respondents duly performed their duty extraordinary in capacity of their power/ jurisdiction but such circumstances in which husband of the petitioner was taken away by the security forces/ agency was beyond its ambit of jurisdiction. Rest of Para is denied for the reason that petitioner has never ever filed any constitution petition before this Honable court for recovery of detune since last seventeen years from date of his missing, and furthermore denied for lack of knowledge and information.
8. Para No8 needs no reply for the reason having no relevancy with replying respondent.
- 9 to 12-Para No- 9 to 12 are incorrect to the extent of replying respondents hence denied for the reason that replying respondents have performed their duty and obligations within four corners of their jurisdiction in current nationwide law and order situation/ circumstances.

PRAYER:

The forgoing explained position / circumstances and humbly submission reveal that petitioner has no cause of action against replying respondents this Honable court may very graciously be pleased to dismiss the instant petition, being devoid of any merits and further more petitioner has no locus-standi to seek **Interim Relief** against replying respondents for the reason that replying respondents has compensated officer concerned financially and morally as well as performed their duty / obligations properly .

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05 JUN 2017

Date: 05-2017

Through

Respondent No-3 to 5



NEELAM-A-KHAN

Advocate Supreme Court of Pakistan

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10 JUN 2017

10 JUN 2017

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

In Res:Writ Petition No.1055-P/ 2017.

Mst, Sumbal Bibi

Petitioner

Vs

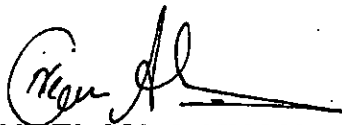
Federation of Pakistan and others.

Respondents

AFFIDAVIT:

I, Syed Umer Farooq Bukhari (RLO), National Bank of Pakistan Regional office Mardan, (Authority Letter) do hereby solemnly affirm and declare that the contents of the Comments are true and correct to the best of my knowledge and belief.

Identified By;



NEELAM-A-KHAN

Advocate Supreme Court Of Pakistan

DATE: 10 / 0 / 2017.

DEROENT

NIC:- 162011376329-9

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05 JUN 2017

No. 200
Certified that the above was verified on solemnly affirmation before me in office this 3-06-2017 day of June 17, 2017.
Signature of RLO Syed Umer Farooq Bukhari
Signature of Neelam-A-Khan
Who is personally known to me
Signature of Commissioner
Post Office Mardan, Peshawar.

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ATTESTED
to the Hon'ble
Judge



NBP

National Bank of Pakistan
Ph #0937- 880127 / 843095 Fax # 0937- 880123

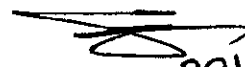
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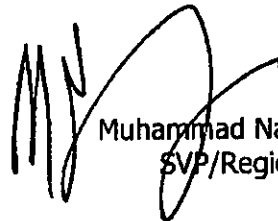
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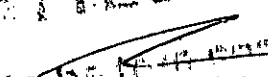
HRMG/ Mardan / 2017/
Dated: 29.05.2017

Authority Letter

Syed Umar Farooq Bukhari, Officer Grade-III / Litigation Officer, of NBP, RO, Mardan, is authorized to appear before Registrar, Peshawar, High Court, and sign / execute affidavit in the W.P. No. 1055/2017 , titled as Mst. Sumbal Bibi Vs Federation of Pakistan & Others.


Ijaz Ahmad
VP/RM HR


Muhammad Naeemullah Jan,
SVP/Regional Head

ATTESTED

29.05.2017

Regional Office, H # 611/612, Sector, S, Sheikh Maltoon Town, Mardan Email: rmhrmrd@nbp.com.pk

HUNGI SHAMOZAI SWAT.

FAX NO. : 0946 752943

14 Apr. 2011 2:54PM F1



National Bank of Pakistan

National Bank of Pakistan
Chungi Br. Swat. 1362

Mr. Nawab Ali,
Manager,
National Bank of Pakistan,
Ghaligay Branch.

No.BR/CIL/2011
Dated: 02.05.2010

Dear Sir,

**REGULARIZATION OF DETENTION PERIOD
MR. NAWAB ALI, OG-II/MANAGER**

With reference to R.O. Mardan letter NO.ROG/IIRM/ADMN/10/1377 dated 29.04.2010, we advise that the competent authority at NBP Head Office Karachi vide letter No.PAW/IIR/RO/(Mardan) DET/167/09/8015 Dated April 28, 2010 has regularized your detention period by sanctioning 183 day privilege leave from 24.08.2009 to 22.02.2010 by exhausting first current balance of 56 day and rest of 127 days from your frozen balance.

Regards

Yours faithfully,

Sd/-
(MANAGER)

C.C.TO:-

1. Regional IIR Chief, NBP Regional Office, Mardan for information please.



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ATTACHED
10/11/2010



NBP

National Bank of Pakistan

ROM/HRM/ADMN/10/ 3651

November 30, 2010

Respected Major General Ashfaq Nadeem,
General officer Commanding 37 Division,
Malakand Top,
MALAKAND AGENCY.

Dear Sir,

DETENTION OF STAFF BY THE SECURITY FORCES:
M/S NAWAB ALI, OG-I/ MANAGER & IRSHAD MEHMOOD, OD III/CASHIER.

Please refer to the subject cited above, we have to bring to your kind knowledge that the above named persons are employees of the National Bank of Pakistan and were posted at NBP Chongi Shamoza Branch as Manager and Cashier respectively. The former were picked up by the army personnel on 24-09-2009 and shifted to an unidentified location where he remained in their custody till 22.02.2010 while the latter was picked up on 24.09.2009 and released on 27.09.2009. After their release both of them were issued certificates regarding their non involvement in anti state activities (photocopy enclosed).

However On 29th, August 2010 at 9.00 Pm Mr. Nawab Ali OG-1, posted as Manager NBP Ghaligay Branch was again picked up by the army personnel from his home at Barikot Swat and taken him to an unidentified location. He is still in their custody. The present incumbent of the branch and family members of Mr. Nawab Ali OG-1 are totally unable to provide us present position of the case. Our high ups at National Bank of Pakistan at head office Karachi are repeatedly requesting for the present status which, we are unable to ascertain in the absence of clear reply from your good self.

It is therefore requested to kindly let us the present status of the case, enabling us to inform our Head Office accordingly. An early response will be highly appreciated.

With Regards,

Yours faithfully,

(YOUSAF KHAN)

/ GENERAL MANAGER HRM

C.C To
Mr. Farhat Anjum, Assistant Vice President, Personnel Administration Wing, HR Management & Admin Group, Head Office, Karachi.

National Bank of Pakistan,
HR & Admin Wing,
Regional Office, Mardan
Phone # 0937-9230019-Fax # 0937-9230057



HRM & Administration Wing
ROM:HRM:ADMN/11/ 1-25
April 27, 2011

To Commandant,
Shangla Task Force,
Circuit House Mingora.

Dear Sir,

DETENTION OF STAFF BY THE SECURITY FORCES
M/S NAWAB ALL OG-II/MANAGER & IRSHAD MEHMOOD, OG-III/ CASHIER

Kindly refer to above; We submit that the above named persons are the employees of National Bank of Pakistan and were posted at NBP Chungi Shamoza Branch, Swat as Manager and Cashier respectively. Both of them were picked up by security forces on 24.09.2009 and shifted them to unidentified location. While the latter was released on 27.09.2009, the former remained in their custody till 22.02.2010. Upon their release they were issued certificates regarding their non involvement in anti state activities. (Photo Log attached)

However on 29.08.2010 at 9.00 pm Mr. Nawab Ali OG-I now posted as Manager NBP Ghaligay Branch was again picked up by the security forces from his home at Barikot and shifted him to an un identified location. He is still in the custody of the security forces. The present incumbent Manager of the said branch and family members of Nawab Ali are unable to provide us the present status of the case. Our high up at National Bank of Pakistan at Head Office Karachi are repeatedly requesting about the present status of the case and reasons of his detention which we are unable to ascertain in the absence of a clear reply from your good office.

In view of the above it is requested to kindly let us the present status of the case and reasons of his detention for our onward submission to Head Office Karachi. Your cooperation in the matter will be highly appreciated.

With Regards,

Yours faithfully,

(YOUSAF KHAN)
GENERAL MANAGER HR

National Bank of Pakistan,
Regional Office, Mardan
Phone # 0937-9230019-Fax # 0937-9230057



NBP
National Bank of Pakistan

HRM & Administration Wing 1406

ROG: HRM: ADMN/10/
June 3, 2011

Mr.S.Hasan Akbar Zaidi,
VP/Head of PAW,
Personnel Administration Wing
HR Management & Admin Group,
National Bank of Pakistan,
Head Office,
KARACHI.

Dear Sir,

DETENTION OF STAFF BY THE SECURITY FORCES
M/S NAWAB ALI, OG-II/MANAGER GHALIGAY BRANCH SWAT

Kindly refer to your letter No.PAW/II/RO(Mardan)/DET/167/09/2990 dated 19.02.2011 on the above subject; as desired We enclose herewith legal opinion of BLA in the matter of detention of the above named officer for your kind perusal and further necessary action please.

With Regards,

Yours faithfully,

(YOUSAF KHAN)
GENERAL MANAGER HR

Encl(a.a)

National Bank of Pakistan,
Regional Office, Mardan
Phone # 0937-9230019-Fax # 0937-9230057

**NBP****NATIONAL BANK OF PAKISTAN**LEGAL DIVISION, HEAD OFFICE: 6TH FLOOR, NBI BUILDING, I. I. CHUNDRIGAR ROAD, KARACHI
TELEPHONE: KARACHI: (009221) 99220907-99062064, EXT FAX: (009221) 99220909

NBP/HO/LEGAL DIV/2011/2270

October 8, 2011

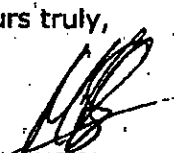
Mr. S. Hasan Akber Zaidi,
Personal Administration Wing,
P&IRD,
HR Management & Administration Group,
Head Office
National Bank of Pakistan
I.I Chundrigar Road
Karachi

Detention of Staff by the Security Forces
Mr. Nawab Ali, OG-II/Manager NBP, Ghailgay Branch.

Dear Sir,

This is with reference of your letter no. PAW/III/RO (MARDAN)/date/167/09/17744 dated 6.10.2011 on the captioned matter. We agree with the opinion of Mr. Guhiam Shoaib Jally Advocate wherein he has advised that writ petition (Habeas Corpus) needs to be filed before the competent court of jurisdiction/laws. Whereby court should be directed security agencies /state for production of the détente Mr. Nawab Ali. In this regard the production of any citizens is the responsibility of state. You can precede the matter in accordance with laws.

Yours truly,


MUHAMMAD SARWAR SHAHID
AVP - Litigation, Legal Division H.O.



NBP

National Bank of Pakistan

HRM & Administration Wing

ROM:HRM:ADMN/11/3017
November 29, 2011

A Saeed Khan,
Senior Vice President,
Legal Affairs Division,
National Bank of Pakistan,
Head Office,
KARACHI.

Dear Sir,

**APPROVAL OF PROFESSIONAL FEE BILL
WRIT PETITION TITLED "NAWAB ALI VS STATE AND OTHERS"
DETENTION OF STAFF BY THE SECURITY FORCES
M/S NAWAB ALI, OG-II/MANAGER GHALIGAY BRANCH SWAT**

This is with reference to SVP/Wing Head letter No.PAW/III/RO(Mardan)/DET/167/09/18531 dated 20.10.2011 on the above subject; We submit that as per BLA opinion and AVP Litigation, Legal Division, NBP HO Karachi we are going to file a writ petition in Peshawar High Court, Dar Ul Qaza Mingora Swat on the behalf of the Bank for recovery of the above named officer.

We further submit that for handling the subject Writ Petition on behalf of the Bank the BLA will charge Rs.45000/-.

Submitted for your kind information and further necessary action please.

Yours faithfully,

(YOUSAF KHAN)
GENERAL MANAGER HR

Encl(a.a)

National Bank of Pakistan,
Regional Office, Mardan
Phone # 0937-9230019-Fax # 0937-9230057

wp1055-2017-mst-sumbal-vs-FOP-comments



ROG: HRM: ADMN/12/ 1298

HRM & Administration Wing
June 04, 2012

Mr.S.Hasan Akbar Zaidi,
VP/Head of PAW,
Personnel Administration Wing
HR Management & Admin Group,
National Bank of Pakistan,
Head Office,
KARACHI.

Dear Sir,

DETENTION OF STAFF BY THE SECURITY FORCES
M/S NAWAB ALL OG-II/MANAGER NBP GHALIGAY BRANCH SWAT

Kindly refer to your letter No.PAW/III/RO(Mardan)/DET/167/09/9503 dated 04.06.2012 on the above subject; we submit that the above named officer is reportedly still in the custody of security forces and his where about is still unknown.

As advised by SVP/Wing Head, Personnel Administration, HR Management & Admin Group, vide letter No.PAW/111/RO(Mardan)/DET/167/09/18531 dated 20.10.2011 we have processed his case for filing a write petition in Peshawar High Court, Dar Ul Qaza Swat on the behalf of the Bank. For handling the said petition on the behalf of the Bank the BLA will charge Rs.45000/- as professional fee. Since we have to obtain permission from Legal Affairs Division, H.O Karachi for approval of professional fee for which we have requested to SVP/Legal Affairs Division to kindly accord us approval vide our letter No.ROM:HRM:ADMN/11/3017 dated 29.11.2011 but till have yet to receive any response from Legal Affairs Division. (Copies Enclosed)

Further we are enclosing all the relevant documents for filing a write petition in Peshawar High Court, Dar Ul Qaza Swat with the request to take up the issue with Legal Affairs Division to accord us approval of the professional fee, enabling us to proceed further in the matter.

b/c
Yours faithfully,

(YOUSAF KHAN)
GENERAL MANAGER HR

(SAEED AHMAD JAN)
REGIONAL HEAD

Encl(a.a)

- 1299
- A Saeed Khan, Senior Vice President, Legal Affairs Division, National Bank of Pakistan, Head Office, Karachi with reference to our letter No. No.ROM:HRM:ADMN/11/3017 dated 29.11.2011 with the similar request.

National Bank of Pakistan,
Regional Office, Mardan
Phone # 0937-9230019-Fax # 0937-9230057



09 AUG 2012
National Bank of Pakistan

LEGAL DIVISION

Head Office: NJI Building, 6th Floor, I.I.Chundrigar Road, Karachi, Telephones: 99217199-99212752 Fax: 99212264

NBP/HO/L.DIV/LIT/2012/2738
August 06, 2012

The Regional Head,
National Bank of Pakistan,
Regional Office,
MARDAN.

The SVP/Wing Head-PAW,
P&IRD - HRM & A Group,
National Bank of Pakistan,
Head Office,
KARACHI

Dear Sir,

**DETENTION OF STAFF BY THE SECURITY FORCES:
M/S. NAWAB ALI, OG-II/MANAGER, NBP, GHAILGAY BRANCH, SWAT**

This has reference to VP-PAW letter No.PAW/III/RO(Mardan)/Det/167/09/13366 dated 30.07.2012 enclosing therewith letter No.ROG:HRM:ADMN/12/1690 dated 24.07.2012 seeking approval for assigning the case to Bank's Legal Counsel Mr. Ghulam Shoaib Jally, Advocate at Professional Fee of Rs.45,000/- for filing Writ Petition before Peshawar High Court, Dar-ul-Qaza, Swat on behalf of the Bank.

In this respect, we have gone through the Office Note dated 18.06.2011 as well as the legal opinion dated 01.06.2011 rendered by the Bank's Legal Counsel Mr. Ghulam Shoaib Jally, Advocate. It appears from the above, that M/s. Nawab Ali, OG-II/Manager and Irshad Mehmood, OG-III (Cashier) were taken up into custody by the security forces in March 2009 during the operation in Malakand. However, they were released on 22.02.2010 and 27.09.2009 respectively with the certificate of their non-involvement in anti-state activities. Subsequently, Mr. Nawab Ali was again picked up 29.08.2010 from his house and detained at un-known place. The Bank's Legal Counsel has advised vide opinion that a Writ Petition (Habeas Corpus Petition) needs to be filed before the competent court of jurisdiction whereby the court should be requested to direct the Security Agencies/State for production of the above named detainee as the production of all citizens of this country is the responsibilities of State.

It should be noted that while filing a Habeas Corpus petition, the petitioner needs to be either the wife, parents, children or any other close relative of the detainee. We are unable to understand as to how and why should NBP file such a petition and under what grounds. We don't feel appropriate that NBP should file such a petition as it needs to be filed by the next of kin of the detained employee.

Regards,


(A. SAEED KHAN)

SENIOR VICE PRESIDENT
LEGAL DIVISION





NBP
National Bank of Pakistan

HRM & Administration Wing

ROG: HRM: ADMN/11/
December 16, 2011

358

27

Mr.S.Hasan Akbar Zaidi,
VP/Head of PAW,
Personnel Administration Wing
HR Management & Admin Group,
National Bank of Pakistan,
Head Office,
KARACHI.

Dear Sir,

DETENTION OF STAFF BY THE SECURITY FORCES
M/S NAWAB ALL OG-II/MANAGER GHALIGAY BRANCH SWAT

-- Kindly refer to your letter No.PAW/III/RO(Mardan)/DET/167/09/20890 dated 13.12.2011 on the above subject; In this connection we submit that as advise by SVP/Wing Head, vide letter No.PAW/111/RO(Mardan)/DET/167/09/18531 dated 20.10.2011 we have processed his case for filing a writ petition in Peshawar High Court, Dar Ul Qaza Swat on behalf of the Bank. For handling the said petition the BLA will charge Rs.45000/- as professional fee, for whose approval we have requested to SVP/Legal Affairs Division, NBP, Head Office, Karachi vide our letter No.ROM:HRM:ADMN/11/3017 dated 29.11.2011 and as soon as they approve the said professional fee we will file the writ petition. (Copies Attachedcd).

Further more his leave record till 10.08.2010 (i.e. the day when he was picked by the security forces is given as under:-

Casual Leave:- 20 Days
Sick Leave:- 18 Days
Frozen Balance:- 65 Days

Yours faithfully,

(YOUSAF KHAN)
GENERAL MANAGER HR

Encl(a.a)

National Bank of Pakistan,
Regional Office, Mardan
Phone # 0937-9230019-Fax # 0937-9230057



NBP

National Bank of Pakistan

PAW/III/RO (Mardan)/DET/167/09/ *KMM*

03 SEP 2012

August 31

, 2012

The Regional Head
National Bank of Pakistan
Regional Office
Mardan

Dear Sir,

**VACATION OF APPOINTMENT/ REGULARIZATION OF DETENTION PERIOD
DETENTION OF STAFF BY THE SECURITY FORCES:
M/S NAWAB ALI, OG-II/MANAGER (PF# 0189902), NBP, GHAILGAY BRANCH, SWAT**

Please refer to your letter No. ROG:HRM:ADMN/12/1690 dated 24.07.2012 on the above subject. We advise that, after due consideration of the all aspects of the case the competent authority has decided to regularize detention period of Mr. Nawab Ali, OG-II/Manager (PF# 0189902), NBP, Ghailgay Branch, Swat i.e 212 days (10.08.2010 to 09.03.2011) from the date of detention till expiry of his available leave balance at his credit and also vacate-his appointment w.e.f. 10.03.2011.

He may be advised accordingly, under intimation to us and all concerned.

Yours sincerely,

(Signature)
(Farhat Anjum)
Asstt. Vice President

(Signature)
(S. Hasan Akber Zaidi)
Vice President

Personnel Administration Wing, P&IRD, HR Management & Administration Group

☎ # 021-9212868 / 9212830, ☎ # 021-9212792 / 9212246
National Bank of Pakistan

Head Office, I.I. Chundrigar Road, Karachi. Ph : 99220100 (50 lines)
Website: www.nbp.com.pk

Adv-2009/116/Abdul Rehman

wp1055-2017-mst-sumbal-vs-FOP-comments



HRM & Administration Wing
Regional Office Mardan

September 5, 2012

ROM/HRM/UA/2012/31P8

OFFICE ORDER:

**VACATION OF APPOINTMENT/REGULARIZATION OF DETENTION PERIOD
DETENTION OF STAFF BY THE SECURITY FORCES
MR. NAWAB ALI, OG-II/MANAGER, (PF#0189902), NBP GHALIGAY BRANCH SWAT**

After taking into considerations all aspects of the case the competent authority as advised vide letter No.PAW/III/RO(Mardan)/DET/167/09/14474 dated August 31, 2012 has regularized unauthorized detention period of of Mr. Nawab Ali, OG-II/Manager (PF#0189902) NBP, Ghaligay Branch, Swat i.e 212 days (10.08.2010 to 09.03.2011) from the date of detention till expiry of his available leave balance at his credit and also vacate his appointment w.e.f 10.03.2011.

(YOUSAF KHAN)
GENERAL MANAGER HR

(SAEED AHMAD JAN)
REGIONAL HEAD

Mr. Nawab Ali,
OG-II/Manager, P.F No (0189902)
NBP Ghaligay Branch Swat.

C.C.To:

- 31PP
- The VP Personnel Administration Wing, HR Management & Admin Group, NBP Head Office, Karachi for information and circulation among all concerned. He has been allotted Signature No. B-8788.
 - The VP, Staff Loans and Welfare Wing, , HR Management & Admin Group, NBP Head Office, Karachi for information please.
 - The AVP Promotion Cell, HR Management & Admin Group, NBP Head Office, Karachi for information please.
 - The RMC, NBP, Regional Office, Mardan.
 - The Manager NBP Ghaligay Branch Swat.
 - Incharge Personal File.



National Bank of Pakistan

HEAD OFFICE KARACHI

INFORMATION CIRCULAR NO: 189/2012

September 28, 2012

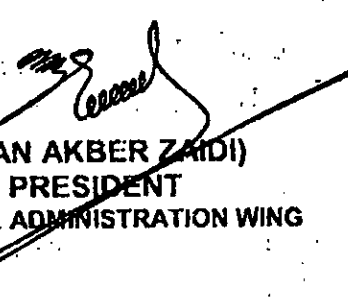
7/1/12

30

**VACATION OF APPOINTMENT
MR. NAWAB ALI, OG-II/MANAGER, (P.F. # 0189902), -
NBP, GHAILGAY BRANCH, SWAT**

It is notified for information of all concerned that the appointment of Mr. Nawab Ali, OG-II/Manager, (P.F. # 0189902), NBP, Ghailgay Branch, Swat has been vacated w.e.f 10.03.2011.

His Specimen Signature Number appearing in the Bank's (New / Revised) Authorised Signature Book of Executives / Officers issued in November 2004 at Serial Number B-8885 should be cancelled immediately.


(S. HASAN AKBER ZAIDI)
VICE PRESIDENT
PERSONNEL ADMINISTRATION WING


(MUHAMMAD AFSAR)
SVP/WING HEAD
PERSONNEL ADMINISTRATION WING

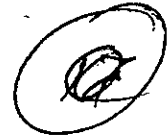
Copy to :-

1. All SEVPs / Chief of Groups / Head of Divisions/Wings/ Departments at Head Office.
2. All Regional Head/GM Operations/GM Business/GM HR/GM Credit.
3. All Regional Audit Chiefs / Directors NBP Staff Colleges.
4. All Chief Managers / Managers/ Operation Managers (Foreign / Corporate / Domestic) Branches.
5. The Financial Controller, Financial Control Division, NBP, HO, Karachi
6. Promotion Cell / GNT / Information Cell, Personal File Section (HRM &AG) Head Office, Karachi


Attest



05 OCT 2012



PAW/III/RO (Mardan)/DET/167/09/ 16391

October 3, 2012

The Regional Head
National Bank of Pakistan
Regional Office
Mardan

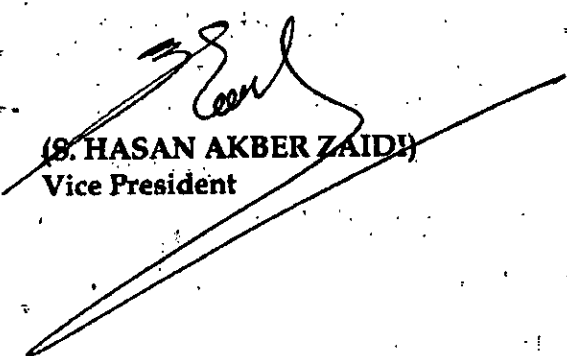
Handwritten notes: HRL, 5m 8/15, 1/5/12

Dear Sir

**VACATION OF APPOINTMENT/ REGULARIZATION OF DETENTION PERIOD
DETENTION OF STAFF BY THE SECURITY FORCES:
M/S NAWAB ALL OG-II/MANAGER
NATIONAL BANK OF PAKISTAN, GHAILGAY BRANCH**

Please refer to our letter No. PAW/III/RO (Mardan)/DET/167/09/14744 dated 31.08.2012 on the above subject. We advise to send us copy of decision conveyed to the above named Ex-Officer, for our further necessary action.

Yours sincerely,


(S. HASAN AKBER ZAIDI)
Vice President

Handwritten signature/initials

Personnel Administration Wing, P&IRD, HR Management & Administration Group

☎ # 021-9212868 / 9212830, ☎ # 021-9212792 / 9212246

National Bank of Pakistan

DET-167-097

Head Office, I.I. Chundrigar Road, Karachi. Ph : 99220100 (50 lines)

Website: www.nbp.com.pk

wp1055-2017-mst-sumbal-vs-FOP-comments

Handwritten notes and signature at the bottom right

Ann - 9.

HUMAN RESOURCE MANAGEMENT & ADMIN. GROUP Pay Slip for the Month of March 2012 National Bank of Pakistan

Name:	NAWAB ALI KHAN	Grade :	OG-II
Type of Emp :	Regular	Place of Posting :	GHALIGAY DIST SWAT
Employee No :	00013560	Region / Head Office :	Mardan
PF No :	189902	A/C Type:	Payment Order
CNIC No :	1560204169937	A/C No:	999999
NTN No :		Payment Branch Code :	1364

Pays & Allowances	Amount	Deductions	Amount
Basic Pay	19,184.00	PF Deduction OG/Mgt	1,918.00
House Rent Allowance	10,551.00	Welfare Fund OGI to OGIII	25.00
Utilities Allowance 17%	3,261.00	Group Insurance OG	747.50
Educ. Allow. Regular Mgmt	7,000.00	Benevolent Fund E/O	145.00
Key Allowance	500.00		
Conveyance Allowance	16,656.60		

Loan Installment	Amount
Other Loan Installment / 1500036 / 1364	2,800.00
HBF Inst / 563 / 1362	4,600.00
M/Car Inst / 50041 / 1364	7,600.00
Eid Advance Deduction / 99999 / 1364	1,550.30

Gross Salary :	57,152.60	Total Deductions:	19,385.80
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Net Salary Rs : 37,766.80

Income Tax Information

Disclaimer:

1. This salary slip is not valid for presentation as proof of salary to any individual/institution until & unless stamped & signed by the Head of concerned Branch/Office.
2. For incorporating corrections/amendments in the salary slip, please contact the concerned Regional GM-HR or the Wing Head, EBW, HRM & AG, Head Office, Karachi.


~~3058914690~~ - ~~497,000/-~~
~~1364~~
~~999999~~


ALC No. 3058914690
 Credit Balance of Rs. 497,000/-
 Branches NBP Ghaligay Branch. (1364)

33

(Signature)

NBP		GHALIGAY DIST SWAT(1364)		SALARY SLIP FOR THE MONTH OF JANUARY - 2011	
National Bank of Pakistan					
Emp. No:	48579	P.F. No.:	189902	CNIC:	15602-0416993-7
Name:	NAWAB ALI KHAN	Designation:	OFF. GR. II.	Employment Type:	Permanent
NTN No.:	0	Group/Division:			
Basic Salary:	11,973.00				
ALLOWANCES		DEDUCTIONS		MISC. INFORMATION	
House Rent Allowance	6,286.00	Group Insurance	747.50	Total Provident Fund	
Conveyance Allowance	12,074.70	Benevolent Fund	100.00	since July 2009	
Utility Allowance	1,796.00	Provident Fund	1,197.00	Total Income Tax	
Cost Of Medicine	2,155.00	Income Tax	0.00	Deducted since July 2009	
Education Allowance	5,000.00	Union Fund			
D/fellow. Relief	1,796.00	Staff Welfare Foundation	25.00		
Key Allowance	500.00	Misc. Deduction			
PhD Allowance		Temporary Deduction			
S.Guard Allowance		Other Income Tax			
Other Allowance		Income Tax Recovery	1,321.00		
Hill Allowance		ADVANCES		MEDICAL AVAILED INFO.	
RMT Allowance					
Severe Winter Allowance	2,500.00				
Unattractive Area Allowance		LOANS		PRINCIPAL OUTSTANDING BR.(002)	
Technical Allowance		HBF /1362 /563	4,600.00		
Core Banking Allowance		M/C /1364 /50041	7,600.00		
Arrears [Taxable]		O/LOAN /1364 /1500036	2,800.00		
Arrears [Nontaxable]					
Washing Allowance					
Deputation Allowance					
Displacement Allowance					
Teaching Allowance					
GROSS SALARY	44,080.70	TOTAL DEDUCTION	18,390.50	NET SALARY	25,690.20

Paid Through PO, to GHALIGAY DIST SWAT (1364)

NBP		GHALIGAY DIST SWAT(1364)		SALARY SLIP FOR THE MONTH OF JANUARY - 2011	
National Bank of Pakistan					
Emp. No:	83758	P.F. No.:	140930	CNIC:	15602-0465923-9
Name:	AKHTAR ALI	Designation:	OFF. GR. II.	Employment Type:	Permanent
NTN No.:		Group/Division:			
Basic Salary:	9,399.00				
ALLOWANCES		DEDUCTIONS		MISC. INFORMATION	
House Rent Allowance	4,934.00	Group Insurance	747.50	Total Provident Fund	
Conveyance Allowance	12,074.70	Benevolent Fund	100.00	since July 2009	
Utility Allowance	1,410.00	Provident Fund	940.00	Total Income Tax	
Cost Of Medicine	1,692.00	Income Tax	0.00	Deducted since July 2009	
Education Allowance	5,000.00	Union Fund			
D/fellow. Relief	1,410.00	Staff Welfare Foundation	25.00		
Key Allowance	500.00	Misc. Deduction			
PhD Allowance		Temporary Deduction			
S.Guard Allowance		Other Income Tax			
Other Allowance		Income Tax Recovery	772.00		
Hill Allowance		ADVANCES		MEDICAL AVAILED INFO.	
RMT Allowance					
Severe Winter Allowance	2,500.00				
Unattractive Area Allowance		LOANS		PRINCIPAL OUTSTANDING BR.(002)	
Technical Allowance		C/L /1364 /100032	1,100.00		
Core Banking Allowance		M/C /1364 /10050	7,600.00		
Arrears [Taxable]		O/LOAN /1364 /1500045	2,800.00		
Arrears [Nontaxable]					
Washing Allowance					
Deputation Allowance					
Displacement Allowance					
Teaching Allowance					
GROSS SALARY	38,919.70	TOTAL DEDUCTION	14,084.50	NET SALARY	24,835.20

(Signature)
Akhtar

Credited to PLS Account: 1435-6, to GHALIGAY DIST SWAT (1364)

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 NBP National Bank of Pakistan		GHALIGAY DIST SWAT(1364) SALARY SLIP FOR THE MONTH OF FEBRUARY - 2011	
Emp. No:	48579	P.F. No.:	189902
Name:	NAWAB ALI KHAN	Designation:	OFF. GR. II.
NTN No.:	0	Group/Division:	
Basic Salary:	11,973.00	CNIC:	15602-0416993-7
Employment Type:	Permanent		
ALLOWANCES		DEDUCTIONS	MISC. INFORMATION
House Rent Allowance	6,286.00	Group Insurance	747.50
Conveyance Allowance	12,074.70	Benevolent Fund	106.00
Utility Allowance	1,796.00	Provident Fund	1,197.00
Cost Of Medicine	2,155.00	Income Tax	0.00
Education Allowance	5,000.00	Union Fund	
D/allow. Relief	1,796.00	Staff Welfare Foundation	25.00
Key Allowance	500.00	Misc. Deduction	
PhD Allowance		Temporary Deduction	
S.Guard Allowance		Other Income Tax	
Other Allowance		Income Tax Recovery	1,321.00
Hill Allowance		ADVANCES	MEDICAL AVAILABLE INFO.
RMT Allowance			
Severe Winter Allowance	2,500.00		
Unattractive Area Allowance			
Technical Allowance			
Core Banking Allowance			
Arrears [Taxable]			
Arrears [Nontaxable]			
Washing Allowance			
Deputation Allowance			
Displacement Allowance			
Teaching Allowance			
GROSS SALARY	44,080.70	TOTAL DEDUCTION	18,390.50
		NET SALARY	25,690.20

Paid Through PO, to GHALIGAY DIST SWAT (1364)

 NBP National Bank of Pakistan		GHALIGAY DIST SWAT(1364) SALARY SLIP FOR THE MONTH OF FEBRUARY - 2011	
Emp. No:	83758	P.F. No.:	140930
Name:	AKHTAR ALI	Designation:	OFF. GR. II.
NTN No.:		Group/Division:	
Basic Salary:	9,399.00	CNIC:	15602-0465923-9
Employment Type:	Permanent		
ALLOWANCES		DEDUCTIONS	MISC. INFORMATION
House Rent Allowance	4,934.00	Group Insurance	747.50
Conveyance Allowance	12,074.70	Benevolent Fund	100.00
Utility Allowance	1,410.00	Provident Fund	940.00
Cost Of Medicine	1,692.00	Income Tax	0.00
Education Allowance	5,000.00	Union Fund	
D/allow. Relief	1,410.00	Staff Welfare Foundation	25.00
Key Allowance	500.00	Misc. Deduction	
PhD Allowance		Temporary Deduction	
S.Guard Allowance		Other Income Tax	
Other Allowance		Income Tax Recovery	772.00
Hill Allowance		ADVANCES	MEDICAL AVAILABLE INFO.
RMT Allowance			
Severe Winter Allowance	2,500.00		
Unattractive Area Allowance			
Technical Allowance			
Core Banking Allowance			
Arrears [Taxable]			
Arrears [Nontaxable]			
Washing Allowance			
Deputation Allowance			
Displacement Allowance			
Teaching Allowance			
GROSS SALARY	38,919.70	TOTAL DEDUCTION	14,084.50
		NET SALARY	24,835.20

Me
Attended

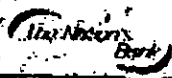
Credited to PLS Account: 1435-6, to GHALIGAY DIST SWAT (1364)

**NBP**

HUMAN RESOURCE MANAGEMENT & ADMIN. GROUP

Pay Slip for the Month of April 2012

National Bank of Pakistan



35

Name:	NAWAB ALI KHAN	Grade :	OG-II
Type of Emp :	Regular	Place of Posting :	GHALIGAY DIST SWAT
Employee No :	00013560	Region / Head Office :	Mardan
PF No :	189902	A/C Type:	Payment Order
CNIC No :	1560204169937	A/C No:	999999
NTN No :		Payment Branch Code :	1364

Pays & Allowances	Amount	Deductions	Amount
Basic Pay	19.281,00	PF Deduction (A)	564,00
House Rent Allowance	10.605,00	PF Deduction OG/Mgt	1.928,00
Utilities Allowance 17%	3.278,00	Welfare Fund OGI to OG/II	25,00
Educ. Allow. Regular Mgmt	7.000,00	Group Insurance OG	747,50
Key Allowance	500,00	Benevolent Fund E/O	145,00
Conveyance Allowance	17.629,00		
Basic Pay (A)	5.580,00		
House Rent Allowance (A)	2.928,00		
Utilities Allowance (A)	840,00		
Cost Medicine (A)	1.008,00		
Dearness Allowance (A)	840,00		
Final Bonus (A)	1.186,00		

Loan Instalment	Amount
Other Loan Instalment / 1500036 / 1364	2.800,00
HBF Inst / 563 / 1362	4.600,00
M/Car Inst / 50041 / 1364	7.600,00
Eid Advance Deduction / 99999 / 1364	1.550,30

Gross Salary :	70.675,00	Total Deductions:	19.959,80
Net Salary Rs :	50.715,20		

Income Tax Information**Disclaimer:**

1. This salary slip is not valid for presentation as proof of salary to any individual/institution until & unless stamped & signed by the Head of concerned Branch/Office.
2. For incorporationg corrections/ammendments in the salary slip, please contact the concerned Regional GM-HR or the Wing Head, EBW,HRM & AG, Head Office, Karachi.

Attended

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NBP

HUMAN RESOURCE MANAGEMENT & ADMIN. GROUP

Pay Slip for the Month of May 2012



National Bank of Pakistan

Name: NAWAB ALI KHAN		Grade : OG-II	
Type of Emp : Regular		Place of Posting : GHALIGAY DIST SWAT	
Employee No : 00013560		Region / Head Office : Mardan	
PF No : 189902		A/C Type: Payment Order	
CNIC No : 1560204169937		A/C No: 999999	
NTN No :		Payment Branch Code : 1364	
Pays & Allowances		Deductions	
	Amount		Amount
Basic Pay	19.281,00	PF Deduction OG/Mgt	1.928,00
House Rent Allowance	10.605,00	Welfare Fund OGI to OGIII	25,00
Utilities Allowance 17%	3.278,00	Group Insurance OG	747,50
Educ. Allow. Regular Mgmt	7.000,00	Benevolent Fund E/O	145,00
Key Allowance	500,00		
Conveyance Allowance	17.629,00		
		Loan Installment	
			Amount
		Other Loan Installment / 1500036 / 1364	2.800,00
		HBF Inst / 563 / 1362	4.600,00
		M/Car Inst / 50041 / 1364	7.600,00
		Eid Advance Deduction / 99999 / 1364	1.550,30
Gross Salary :		Total Deductions:	
58.293,00			19.395,80
Net Salary Rs : 38.897,20			
Income Tax Information			
Disclaimer:			
1. This salary slip is not valid for presentation as proof of salary to any individual/institution until & unless stamped & signed by the Head of concerned Branch/Office.			
2. For incorporating corrections/amendments in the salary slip, please contact the concerned Regional GM-HR or the Wing Head, EBW, HRM & AG, Head Office, Karachi.			

Anu —

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QSYSPRT080366

NATIONAL BANK OF PAKISTAN

NAWAB ALI KHAN S/O ABDUL MATEEN K
BARIKOT SWAT

001

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 001608-7
BRANCH CODE/NAME: 1364-GHALIGAY DIST SWAT
REGION NAME : Mardan

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2010-01-01	BAL B/F				
2010-03-26	TRANSFER	99980014		2847.00	2,847.00
2010-03-27	TRANSFER	99960032		21886.00	24,733.00
2010-03-29	CHEQUE	165826	4700.00		20,033.00
2010-04-19	CHEQUE	165827	20000.00		33.00
2010-04-20	TRANSFER	99990009		30000.00	30,033.00
2010-04-20	CHEQUE	165828	15000.00		15,033.00
2010-04-26	TRANSFER	99970042		19286.00	34,319.00
2010-04-28	CHEQUE	165829	30000.00		4,319.00
2010-04-29	CASH	99990013		100000.00	104,319.00
2010-05-05	TRANSFER	99960007		28669.00	132,988.00
2010-05-06	CASH	99970008		124000.00	256,988.00
2010-05-06	TRANSFER	99980006		6127.00	263,115.00
2010-05-07	Dr Vochr	99670059	28669.00		234,446.00
2010-05-10	TRANSFER	99970013		30000.00	264,446.00
2010-05-11	CHEQUE	165830	8000.00		256,446.00
2010-05-13	TRANSFER	99970012		33062.00	289,508.00
2010-05-13	CHEQUE	165831	33000.00		256,508.00
2010-05-14	CHEQUE	165832	150000.00		106,508.00
2010-05-17	CHEQUE	165833	6500.00		100,008.00
2010-05-18	TRANSFER	99950022		390000.00	490,008.00
2010-05-20	CASH	99980004		45000.00	535,008.00
2010-05-21	CHEQUE	165834	10000.00		525,008.00
2010-05-25	CHEQUE	165835	17742.00		507,266.00
2010-05-26	CASH	99970016		188000.00	695,266.00
2010-05-28	TRANSFER	99970025		26039.00	721,305.00
2010-05-28	CHEQUE	165836	25000.00		696,305.00
2010-05-31	CASH	99970026		100000.00	796,305.00
2010-05-31	CHEQUE	165837	5000.00		791,305.00
2010-06-01	CHEQUE	165838	26000.00		765,305.00
2010-06-02	CHEQUE	165839	10378.00		754,927.00
2010-06-03	CASH	99970014		80000.00	834,927.00
2010-06-07	CASH	99970048		66000.00	900,927.00
2010-06-07	CHEQUE	165840	20000.00		880,927.00
2010-06-09	CHEQUE	165841	20000.00		860,927.00
2010-06-21	CHEQUE	165842	80000.00		780,927.00
2010-06-21	TRANSFER	165843	5380.00		775,547.00
2010-06-23	TRANSFER	99980024		25214.00	800,761.00

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Attested

wp1055-2017-mst-sumbal-vs-FOP-comments

QSYSPRT080366 (2)

NATIONAL BANK OF PAKISTAN

NAWAB ALI KHAN S/O ABDUL MATEEN K
BARIKOT SWAT

001

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 001608-7
BRANCH CODE/NAME: 1364-GHALIGAY DIST SWAT
REGION NAME : Mardan

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2010-07-01	BAL B/F				800,761.00
2010-07-05	CHEQUE	165845	30000.00		770,761.00
2010-07-08	TRANSFER	99970027		181000.00	951,761.00
2010-07-08	TRANSFER	99980007		46000.00	997,761.00
2010-07-08	CHEQUE	165846	47216.00		950,545.00
2010-07-15	CASH	99980019		117000.00	1,067,545.00
2010-07-16	PFT/LOSS	96030000		6915.00	1,074,460.00
2010-07-20	CHEQUE	165847	465000.00		609,460.00
2010-07-26	CHEQUE	165848	100000.00		509,460.00
2010-07-27	CHEQUE	165849	30000.00		479,460.00
2010-07-28	CASH	99970047		34000.00	513,460.00
2010-07-28	TRANSFER	99980015		24719.00	538,179.00
2010-08-06	TRANSFER	99970027		5000.00	543,179.00
2010-08-11	TRANSFER	99970019		5000.00	548,179.00
2010-08-17	TRANSFER	99970013		11973.00	560,152.00
2010-08-25	Salary	99980019		35119.00	595,271.00
2010-09-15	TRANSFER	99960001		13000.00	608,271.00
2010-09-22	Salary	99980021		24719.00	632,990.00
2010-10-26	Salary	99980025		24719.00	657,709.00
2010-11-10	TRANSFER	99960011		11973.00	669,682.00
2010-11-12	TRANSFER	99960002		12000.00	681,682.00
2010-11-29	Salary	99970014		27456.00	709,138.00
2010-11-29	Dr Vochr	99960029	5000.00		704,138.00
2010-12-18	Salary	99960009		27456.00	731,594.00
	DR-SUM	677216.00	CR-SUM	1408810.00	

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QSYSPRT080366 (3)

NATIONAL BANK OF PAKISTAN

NAWAB ALI KHAN S/O ABDUL MATEEN K
BARIKOT SWAT

001

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 001608-7
BRANCH CODE/NAME: 1364-GHALIGAY DIST SWAT
REGION NAME : Mardan

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2011-01-01	BAL B/F				731,594.00
2011-01-06	TRANSFER	99900010		5987.00	737,581.00
2011-01-06	TRANSFER	99910006		10586.00	748,167.00
2011-01-15	PFT/LOSS	96240000		22786.00	770,953.00
2011-01-21	STAN.INS	99990006	2500.00		768,453.00
2011-01-26	Salary	99970018		26976.00	795,429.00
	DR-SUM		2500.00	CR-SUM	797929.00

Page 1

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Attested
(ne)

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QSYSPRT080366 (4)

NATIONAL BANK OF PAKISTAN

NAWAB ALI KHAN S/O ABDUL MATEEN K
BARIKOT SWAT

001

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 001608-7
BRANCH CODE/NAME: 1364-GHALIGAY DIST SWAT
REGION NAME : Mardan

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2011-07-01	BAL B/F				795,429.00
2011-07-16	PFT/LOSS	96270000		26691.00	822,120.00
	DR-SUM		.00	CR-SUM 822120.00	

Attested
(Signature)

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QSYSPRT080366 (5)

NATIONAL BANK OF PAKISTAN

NAWAB ALI KHAN S/O ABDUL MATEEN K
BARIKOT SWAT

001

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 001608-7
BRANCH CODE/NAME: 1364-GHALIGAY DIST SWAT
REGION NAME : Mardan

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2012-01-01	BAL B/F				822,120.00
2012-01-19	PFT/LOSS	96360000		28182.00	850,302.00
2012-01-30	STAN.INS	99980013	69424.00		780,878.00
2012-06-26	TRANSFER	20003		1550.00	782,428.00
2012-06-26	Salary	20004		50293.50	832,721.50
	DR-SUM	69424.00	CR-SUM	902145.50	

QSYSPRT080366 (6)

NATIONAL BANK OF PAKISTAN

NAWAB ALI KHAN S/O ABDUL MATEEN K
BARIKOT SWAT

001

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 001608-7

BRANCH CODE/NAME: 1364-GHALIGAY DIST SWAT

REGION NAME : Mardan

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2012-07-01	BAL B/F				832,721.50
2012-07-16	PFT/LOSS	10012		27874.00	860,595.50
2012-08-01	TRANSFER	10001		19281.00	879,876.50
2012-08-01	Salary	10002		58766.50	938,643.00
2012-08-16	TRANSFER	30003		15000.00	953,643.00
2012-08-18	TRANSFER	20002		59644.50	1,013,287.50
2012-10-05	Salary	10005		61546.50	1,074,834.00
	DR-SUM	.00	CR-SUM	1074834.00	

POWER OF ATTORNEY
(Wakalatnama)

43

BEFORE PESHAWAR HIGH COURT PESHAWAR

In writ petition No. 1055-P / 2017

Mst. Sumbal Bibi widow of Late Nawab Ali

VERSUS

NBP etc. & Others

I/We MUHAMMAD NAEEMULLAH JAN

the _____ above-named do hereby appoint, **Ms. Neelum Khan, Advocate**, in the above mentioned case, to do all or any of the following acts, deeds and things:

1. To appear, act and plead for me/us in the above mentioned case in this court/tribunal or any other court tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
2. To sign and verify and file or withdraw all proceedings petitions, appeals, affidavits, and applications for compromise or withdrawal, or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
3. To receive payment of, and issue receipts for, all money that may be or become due and payable to us during the course or on the conclusion of the proceedings.

To do all other acts and things which may be deemed necessary or advisable during the course of the proceedings.

AND I/WE hereby agree:

- a. to ratify whatever the Advocate/s may do in the proceedings.
- b. not to hold the Advocate/s responsible if the said case be proceeded ex-parte or dismissed in default in consequence of his absence from the court when it is called for hearing.
- c. that the Advocate/s shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fees remain unpaid.

IN WITNESS WHEREOF I/We have signed this Power of Attorney hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this ____ Day of _____ 2017 at _____

Signature of Muhammad Naeem Ullah Jan
Regional Head
National Bank of Pakistan
Regional Office, Mardan

Attested and Accepted:
Neelum Khan
Advocate

FILED TODAY
Deputy Registrar
05 JUN 2017

wp1055-2017-mst-sumbal-vs-FOP-comments

Mst. Sumbal Bibi, DMC

IN THE PESHAWAR HIGH COURT, PESHAWAR

44

WP No.1055/2017

Mst. Sumbal Bibi

.....Petitioner

Versus

FOP & 03 Others

.....Respondents

INDEX

S. No.	Description of documents	Dated	Pages
1.	Parawise comments	-	1
2.	Affidavit		2
3.	Banks Nationalization Act, 1974 (Annexed)		3-4

AMIN KHAN
Section Officer
Government of Pakistan
Finance Division
Islamabad

copy handed - one
12/4/17

FILED TODAY
Deputy Registrar
12 APR 2017

WP1055-2017-Mst-Sumbal-Bibi-VS-FOP&Others

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IN THE PESHAWAR HIGH COURT, PESHAWAR

WP No.1055/2017

Mst. Sumbal Bibi

VERSUS

Federation of Pakistan (FOP) & 03 Others

REPORT ON BEHALF OF SECRETARY, FINANCE DIVISION, ISLAMABAD
(RESPONDENT NO.1)

Respectfully Sheweth,

It is respectfully submitted that Mst. Sumbal Bibi is the widow of a deceased Nawab Ali Khan who was working as Assistant in National Bank of Pakistan (NBP). The petitioner states that her husband was working as Manager in NBP, District Swat who was abducted by unknown person from his office on 08.08.2010 and was later on handed over to the heirs when he was expired. The petitioner intends to declare deceased as "Shaheed on duty" and to grant all the admissible perks and privileges in this regard.

2. It is submitted that in terms of Section 11(10) of Banks (Nationalization) Act, 1974 (**Annexed**) all selections, promotions and transfer of employees of banks except the President and decision as to their remuneration and benefits shall be made by the President in accordance with the evaluation criteria and personnel policies determined by the Board. Hence, the case pertains to an operational matter of NBP whose management is fully competent to formulate policies including Human Resources, compensation and other matters relating to their employees.

PRAYER

In view of the above, it is humbly prayed that being service matter of the employee, the case exclusively pertains to NBP. Therefore, the name of Respondent No.1, Ministry of Finance through Finance Secretary, Islamabad may be deleted.

ON BEHALF OF RESPONDENT NO.1
AMIN KHAN
Section Officer
Government of Pakistan
Finance Division
Islamabad

FILED TODAY
Deputy Registrar

12 APR 2017

WP1055-2017-Mst-Sumbal-Bibi-VS-FOP&Others

44 Mustafat ulloha, DAC

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

46
WP No.1055/2017

Mst. Sumbal Bibi

.....Petitioner

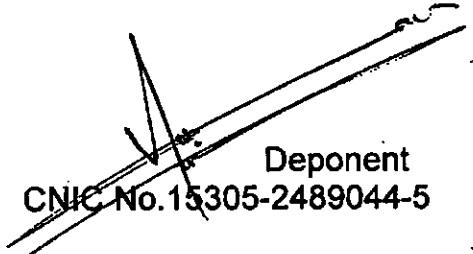
VERSUS

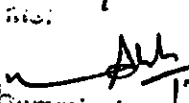
FOP & 03 Others

.....Respondents

AFFIDAVIT

I, Amin Khan, Section Officer, Finance Division, Islamabad, do hereby solemnly affirm and declare on oath that the contents of this Report on behalf of Secretary, Finance Division, Islamabad, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


Deponent
CNIC No.15305-2489044-5

No. 21753
Certified that the above was verified on solemnly
affirmation before me this 12th
day of April 17. Amin Khan
s/o Sec 077 Islamabad
who was identified by Self
Who is personally known to me:

Oath Commissioner 12/4/17
Peshawar High Court, Peshawar.

Nadra Verified

FILED TODAY

Deputy Registrar

12 APR 2017

WP1055-2017-Mst-Sumbal-Bibi-VS-FOP&Others



National Database and Registration Authority
Research and Development

homepage verisys individual-record

ONLINE Verisys VERIFICATION SYSTEM

Verification Date: April 12, 2017

Identity Card Number:

15305-2489044-5

	PAKISTAN National Identity Card ISLAMIC REPUBLIC OF PAKISTAN	
	Name Amin Khan آمین خان	
	Father Name Lal Shahzada لعل شہزاد	
	M Pakistan Identity Number: 15305-2489044-526.04.1975 Date of Birth: 08.03.2016 Date of Issue: 08.03.2016 Date of Expiry: 08.03.2026	
54594		Holder's Signature

	کمپٹر، تحصیل لال قلعہ، ضلع لونر دیر	
	کمپٹر، تحصیل لال قلعہ، ضلع لونر دیر	
Usman Y. Memon Registrar General of Pakistan		101081103700

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3

Extract of Banks (Nationalization) Act, 1974

11. General provisions pertaining to management of banks.- (1) Subject to subsection (2) a bank shall have a Board consisting of-

(a) a President, who shall be its Chief Executive; and

(b) not less than five and not more than seven other members including one or more directors whose elections by the private shareholders, removal and other matters shall be governed by the Companies Ordinance, 1984 (XL VII of 1984)."

(2) The Federal Government may, if it deems necessary, appoint a Chairman of the Board in respect of a bank.

(3) The Chairman, the President and other members of the Board representing the Federal Government's director and indirect shareholding.

(a) shall be appointed by the Federal Government in consultation with the State Bank, for a term of three years, on such terms and conditions as may be fixed by the General Meeting of the bank: provided that the Chairman and the President shall be appointed from amongst professional bankers whose names are included in a panel of bankers qualified to be the Chairman or the President, which panel shall be determined, maintained and varied, from time to time, by the State Bank;

(b) may be removed for misconduct or physical and mental incapacity before the expiry of the three years term by the Federal Government in consultation with the State Bank;

(c) shall stand removed if he becomes ineligible on any of the grounds specified in subsection(12);

(d) may be re-appointed for second and final term by the Federal Government, in consultation with the State Bank of Pakistan, for a further period of three years.

(4) The general direction and superintendence of the affairs and business of a bank, and overall policy making in respect of its operations, shall vest in its Board.

(5) The Board shall determine-

- (i) the credit policies of the banks;
- (ii) evaluation criteria for the performance of the employees of the bank other than the President;
- (iii) personnel policies of the bank including appointment and removal of officers and employees;
- (iv) guidelines for entering into any compromise with borrowers and other customers of the bank; and
- (v) any other policy matter.

(6) The Chief Executive and other officers of the bank shall act in accordance with the policies, criteria and guidelines determined by the Board.

(7) The board shall appoint committees from amongst the executives of the bank, and determine the powers, functions and duties of such committees.

(8) Where the Federal Government has appointed a Chairman he shall preside over the meetings of the Board, and in case a Chairman has not been appointed, then the president shall preside over the meetings of Board. In the absence of the Chairman or the President, as the case may be the directors may elect one of its members to preside over the meetings.

(9) The President, subject to the control and directions of the Board, shall exercise powers of management of the affairs of the bank.

Attest
AMIN K P N
Section Officer
Government of Pakistan
Finance Division
Karachi
WP 1055
29/7/77
Mst-Sumbal-Bibi-VS-FOP&Others

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(10) All selections, promotions and transfers of employees of banks except the President and decisions as to their remuneration and benefits shall be made by the President in accordance with evaluation criteria and personnel policies determined by the Board.

(11) The Board, the President and other officers shall exercise their powers and discharge their duties in accordance with sound banking principles and prudent banking practices and shall ensure compliance with regulations and directions that may be issued by the State Bank from time to time.

(12) No person shall be eligible for appointment as the Chairman, the President, or a member of the Board if-

- (a) he is or has at any time been, adjudged an insolvent or has suspended payment or has compounded with his creditors; or
- (b) he is a minor or is found a lunatic or of unsound mind; or
- (c) he is not citizen of Pakistan; or
- (d) he was at any time in the service of Federal Government or a corporation controlled by any such Government or in the service of a bank and was dismissed; or
- (e) he is a person against whom any action has been taken or any proceedings are pending under section 412 of the Companies Ordinance, 1984, (XLVII of 1984), or section 83 of the Banking Companies Ordinance, 1962 (LVII of 1962); or
- (f) he is, or has been convicted for tax evasion under any law for the time being in force; or
- (g) he is a member of the Senate, National Assembly, any Provincial Assembly or an elected Member of a local council constituted under any law relating to local councils;
- (h) he is holding an office in a political party.

Amal

[Signature]
AMIN K P N
Section Officer
Government of Pakistan
Finance Division
Islamabad

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