BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. 948/2013

Date of institution ... 31.05.2013 Date of judgment ... 08.11.2016

Basreen Bibi D/O Raj Ali Khan, PST Teacher GGPS Kotka Mira Jan Dandi Wazir, Bannu.

(Appellant)

VERSUS

- 1. District Education Officer(Femal)Primary & Secondary Bannu. (Ex-DO E&SE Bannu)
- 2. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. Secretary, Elementary and Secondary Education Govt: of Khyber Pakhtunkhwa, Peshawar.

(Respondents)

APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, FOR THE RELEASE OF PAY W.E.F 31.12.2009 TILL DATE WITH ARREARS OF ALLOWANCES ETC FOR WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR, DESPITE THE LAPSE OF STATUTORY PERIOD.

Mr. Umer Zad Shah Bukhari, Advocate.

For appellant.

Mr. Kabir Ullah Khattak, Assistant Advocate General

For respondents.

MR. MUHAMAMD AAMIR NAZIR

MR. PIR BAKHSH SHAH

MEMBER (JUDICIAL) MEMBER (JUDICIAL)

JUDGMENT

MUHAMMAD AAMIR NAZIR, MEMBER: Basreen Bibi D/o Raj Ali Khan, hereinafter referred to as appellant, through the instant appeal under section-4 of Khyber Pakhtunkhwa service Tribunal Act 1974 has prayed for release of her salary w.e.f 31.12.2009

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till date alongwith arrears for which the appellant had filed departmental appeal but the same was not responded within the statutory period.

- 2. Brief facts of the case giving rise to the instant appeal are that the appellant joined the respondent-department as Primary School Teacher on 31.12.2009 and since then she is performing her duties with honesty and full devotion. That despite the fact that since her appointment, the appellant is regularly performing her duties, yet she has not received her monthly salaries alongwith connected allowances till date. That the appellant time and again approached respondents to release her monthly salary but of no avail. That the appellant even approached to the court of Senior Civil Judge, Bannu for that purpose on 22.3.2013 but her plaint was returned vide order dated 05.12.2012. That the appellant filed departmental appeal on 15.02.2013 which was not responded within the statutory period, hence the instant appeal.
- 3. Learned counsel for the appellant argued before the court that the appellant was appointed as Primary School Teacher vide appointment order dated 31.12.2009 and since then she is regularly performing her duties. That despite the fact that she is performing her duties, yet no salary has so far been paid to the appellant. That the respondents were time and again approached by the appellant for release of her monthly salary but of no avail. That the appellant finally approached to the court of Senior Civil Judge, Bannu but her plaint was returned by the court vide order dated 05.12.2012 wherein it was held that as the appellant is a civil servant, therefore, this court has got not jurisdiction. That since the appellant was regular appointed as Primary School Teacher in the year 2009 and till then she is performing her duties, therefore, by acceptance the instant appeal the respondent be directed to release her salaries and related allowances.
- 4. The learned Assistant A.G, while rebutting the arguments advanced by the learned counsel for the appellant, argued before the Tribunal that the appellant is not an employee of the respondent-department. That the impugned appointment order is fake and factitious. That a fact finding enquiry was conducted wherein it was held that the appointment order of the

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appellant is fabricated one and there is no record of her appointment order with the respondentdepartment. That the appellant committed fraud, therefore the instant appeal may be dismissed with cost.

- 5. We have heard arguments of learned counsel for the appellant and learned Assistant A.G for the respondents and have gone through the record available on file.
- Perusal of the case file reveals that the appellant claim be appointed as Primary School Teacher vide impugned order dated 31.12.2009 bearing endst: No.23000-5. The appellant further claim that since she has regularly been appointed as PST Teacher vide order referred above, therefore, respondents be directed to release her monthly salaries as she has been performing duties as PST since her appointment. The respondents on the other hand denied the appointment of the appellant as PST vide impugned order dated 31.12.2009 and in this respect they had conducted a fact finding enquiry. The fact finding enquiry available on file reveals that respondents have never issued any appointed order to the appellant and the one which was produce by the appellant is fabricated, having no record. It was further held in the fact finding enquiry that the date/year in which the appellant claim her appointment, the respondents have never made such order on the above date and year.
- 7. The learned counsel for the appellant in his arguments claim that since the Civil Court vide order dated 05.12.2012 returned the plaint to the appellant on the pretext that she is civil servant, therefore the appellant is prima-facie a civil servant as held by the Civil Court and the respondents cannot deny her appointment order as PST. This arguments advanced by the learned counsel for the appellant carry no weight for the reason that the appellant in her plaint claim to have been appointed as PST, therefore the learned Civil Court without hearing the respondents, vide order dated 05.12.2012 returned the plaint to the appellant under Order-7 Rule-10-CPC stating therein that the perusal of the plaint shows that the appellant/plaintiff is civil servant and that this court has got no jurisdiction into the matter in hand. The civil court had never declared the appellant as civil servant on merits. Hence, in the above stated

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circumstances, we are of the considered view that the impugned appointment order of the appellant is factitious and fabricated having no record with the respondent-department, therefore, the appeal in hand is dismissed with cost. File be consigned to the record.

This judgment will also dispose of other connected Appeal bearing No. 8. 960/2013 by Samreena Bibi, involving common question of law, in the same manner.

ANNOUNCED 08.11.2016

(PIR BAKHSH SHAH) MEMBER

(MUHAMMAD AAMIR NAZIR)

MEMBER

Counsel for the appellant and Ziaullah, GP for respondents present. Rejoinder submitted which is placed on file / To come up for arguments on 19.8.2016.

Member

Membei

19.08.2016

Counsel for the appellant M/S Mst. Razia Bibi, DEO (F) and Sher Zali Khan, Assistant alongwith Mr. Usman Ghani, Sr, GP for respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on/\$\sqrt{8.11.2016}\$.

08.11.2016

Member Counsels for the appellant and Mr. Kabirullah Khattak, Assistant Advocate General for respondents present.

Vide our detailed judgment of today consists of three pages placed on file, we are of the considered view that the impugned appointment order of the appellant is factitious and fabricated having no record with the respondent-department, therefore, the appeal in hand is dismissed with cost. File be consigned to the record.

Announced 08.11.2016

> (MUHAMMAD AAMIR NAZIR) **MEMBER**

(PIR BAKHSH SHAH)

MEMBER

Mr. Naheedullah on behalf of the appellant and Mr. Ashrafullah, ADO alongwith Addl: A.G for respondents present. Para-wise comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 2.10.2015.

Chaurman

02.10.2015

Mr. Nahedullah, on behalf of the appellant and Mr. Sher Zali Khan, Assistant (Lit.) alongwith Asst: AG for the respondents present. Arguments could not be heard due to general strike of the Bar. To come up for arguments on

16.2-16

Member

Member

16.02.2016

Counsel for the appellant, M/S DEO (F) Bannu in person and Hameed-ur-Rehman, AD (lit.) Assistant AG for respondents present. The learned Member (Executive) is on official tour to Abbottabad, therefore, Bench in incomplete. To come up for arguments on

31-5-2016

Member

Mr. Naheedullah attorney for the appellant and Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for written reply/comment on 26.03.2015.

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Reader.

9- 26.03.2015

Mr. Naheedullah on behalf of the appellant, M/S Farzand Ali, Assistant and Khurshid Khan, SO alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Perusal of record would reveal that last opportunity was granted to the respondents for written statement on 26.8.2014 but despite the same written statement is not submitted till date. Let the respondent No. 3, Secretary, Elementary and Secondary Education, KPK be informed of the conduct of the relevant respondents i.e DEO (Female) Primary & Secondary Bannu and Director, E & SE, KPK, Peshawar. Last opportunity is extended to 2.4.2015.

Charman

9- 02.04.2015

Mr. Naheedullah on behalf of the appellant and Mr. Barkat Ali, Litigation Officer for respondent No. 1 alongwith Addl: A.G for respondents present. Requested for further adjournment due to tracing out certain documents. A stern warning was issued to the representative as well as Addl: A.G with the stern direction to submit written statement by 13.4.2015 before S.B.

Chairman

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28.2.2014

Since 14th January has been declared as public holiday on account of "Eid Milad-un-Nabi". Therefore, case is adjourned to 28.2.15

Reader

Mr.Naheed Khan, attorney for the appellant, on behalf of the appellant, M/S Sanobar Khan, ASDO for respondent No. 1, Sajjad Rashid, AD for respondent No. 2 and Khurshid Khan, SO for respondent No. 3 with AAG present. Power of attorney filed on behalf of the appellant. To come up for written reply/comments alongwith connected appeals on 15.5.2014.

15.5.2014

Mr. Nahid Khan, attorney for the appellant arching anobar Khan, ASDO on behalf of respondent No.1 with AAG for the respondents present. Written reply has not been received, and request for further time made on behalf of the respondents. Another chance is given for written reply/comments, positively, on 26.8.2014.

26.08.2014

Mr. Naheedullah, attorney for the appellant, on behalf of the appellant, M/S Shah Qias, Assistant for respondent No. 1, Sajjad Rashid, AD for respondent No. 2 and Khursheed Khan, SO for respondent No. 3 with AAG present. Written reply has not been received despite another chance given for the purpose on the previous date. On the request of the representatives of the respondents and learned AAG, a last chance is given to the respondents for written reply/comments on 09.12.2014

06.08.2013

Appellant with counsel present and heard on preliminary

Contended that the appellant has not been treated in accordance with the law/rules. She was appointed as PTC Teacher in Education Department vide order dated 31.12.2009, and submitted charge report on 04.01.2010 and since then performing her duties but monthly pay with all connected allowances and back benefits have not been paid to her without any fault on her behalf. The appellant time and again approached respondents and submitted so many applications for release of her salaries and other connected allowances etc but with no response. She also filed application before the Senior Civil Judge Bannu which was decided vide order dated 05.12.2012, whereby the appellant was declared as a civil servant. Finally she filed application for release of pay on 15.2.2013 which has not been responded within the statutory period, hence the present appeal. Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notice be issued to the respondents. Case adjourned to 06.11.2013 for submission of written reply.

06.8.2013

for further proceedings. This case be put before the Final Bench

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The appeal of Mst. Basreen Bibi D/O Raj Ali Khan received today i e. on 29/05/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of application mentioned/shown in the Index of the appeal at serial No.4 is not attached with the appeal which may be placed on it.
- 22 Page No. 12 & 13 are missing which may be placed on file.

3- Annexures of the appeal may be attested:

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

UMAR ZAD SHAH BUKHARI ADV. HIGH COURT BANNU.

Resubmitted after its completion

iv p.

6-6-2013

BEFORE THE SERVICE TRIBUNAL K.P PESHAWAR

Service Appeal No 948/2013

Basreen Bibi D/O Raj Ali Khan, PST Teacher GGPS Kotka Mira Jan Dandi Wazir, Bannu

رورين Appellant

VERSUS

- 1. District Education Officer (Female) Primary & Secondary Bannu (Ex-DO E & S Education Bannu)
- 2. Director Elementary and Secondary Education, K.P Peshawar.
- 3. Secretary, Elementary and Secondary Education Govt. of K.P Peshawar.

Respondents

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5.	Copy of plaint & order Registre	~ C4D	15 62 4
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Appellant

Dated: 2**7**/0**5**/2013

Umer Zad Shah Bukhari

BEFORE THE SERVICE TRIBUNAL K.P PESHAWAR



Service Appeal No 9482013

Basreen Bibi D/O Raj Ali Khan, PST Teacher GGPS Kotka Mira Jan Dandi Wazir, Bannu

936 Appellant

VERSUS

- 1. District Education Officer (Female) Primary & Secondary Bannu (Ex-DO E & S Education Bannu)
- 2. Director Elementary and Secondary Education, K.P Peshawar.
- 3. Secretary, Elementary and Secondary Education Govt. of K.P. Peshawar.

Respondents

APPEAL U/S 4 OF THE K.P SERVICE TRIBUNAL ACT 1974. FOR THE RELEASE OF PAY W.E.F. FROM 31-12-2009 TILL DATE WITH ARREARS OF ALLOWANCES ETC FOR WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR, DESPITE THE LAPSE OF STAUTORY PERIOD.

PRAYER:-

On acceptance of the appeal appropriate directions may please be issued to the respondents to act in the matter in accordance with law and to release monthly salaries to the appellant w.e.f. 31-12-20091till date with arrears of allowances and connected benefits.

Respectfully Submitted:-

That the appellant joined the respondent Department as Primary School Teacher on 31-12-2009, received charge on 64-04-2049 and since then she performed her duties with honesty and full devotion. (Copy of appointment order and charge transfer certificate are enclosed as Annexure A).

That since appointment the appellant is regularly performing her duties to the entire satisfaction of superior officers but strange enough that since appointment the monthly pay with all connected allowances and back benefit have not been paid to her without an omission or commission on her part. (Copy of attendance register with respondents custody is enclosed as Annexure B).

ac-submitted to-day

1 16/6/13 1

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- 3. That the appellant time and again approached respondents and submitted so many applications for the release of her monthly salaries and other connected allowances etc but no fruitful result came out.
- 4. That even the appellant approached the Court of Senior Civil Judge Bannu for the purpose on 27/3/2012 (Civil Judge No.05 Bannu) which plaint was returned to the appellant vide order dated 5/12/12. (Copy of plaint and order are enclosed as Annexure C & D).
- 5. That the appellant filed Departmental appeal on 15/2/20/3 which has not been responded so far despite the lapse of more than sixty days. (Copy of appeal is enclosed as Annexure E).
- 6. That the action of the respondents of not releasing the monthly pay with other connected allowances etc of the appellant is against the law, facts and principles of justice on grounds inter alia as follows:-

GROUNDS:-

- A. That respondents have not treated the appellant in accordance with law and rules on the subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan 1973.
- B. That the appellant has regularly performed her duties with honesty and there is no complaint of any sort against her and she is entitled to the pay and other allowances etc for such period.
- C. That the performance of duty without salary amounts to force labour which is prohibited under Article 11 of the Constitution coupled with other Articles.
- D. That the appellant has not been treated in accordance with law and rules on the subject
- E. That the action of the respondents is against the principles of social justice guaranteed in the Constitution.
- F. That the appellant seeks the permission of the honorable tribunal for furthe/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Any other relief as deemed appropriate in the circumstances of the case, not specifically asked for, may also be granted in favor of the appellant.

لر من Appéllant



Through

Hr Bn Wer

Umer Zad Shah Bukhari

Advocate Bannu

AFFIDAVIT

I, Basreen Bibi D/O Raj Ali Khan, PST Teacher GGPS Kotka Mira Jan Dandi Wazir, Bannu do hereby solemnly affirm and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from the honorable Tribunal.

Identified by

روس DEPONENT

Umer Zad Shah Bukhari

BEFORE THE SERVICE TRIBUNAL K.P PESHAWAR



Service Appeal No____/2013

Basreen Bibi D/O Raj Ali Khan, PST Teacher GGPS Kotka Mira Jan Dandi Wazir, Bannu

کوربزے Appellant

VERSUS

- 1. District Education Officer (Female) Primary & Secondary Bannu (Ex-DO E & S Education Bannu)
- 2. Director Elementary and Secondary Education, K.P Peshawar.
- Secretary, Elementary and Secondary Education Govt. of K.P Peshawar.

Respondents

APPLICATION FOR THE RELEASE OF CURRENT SALARIES TILL THE FINAL DECISION OF THE APPEAL

Respectfully, submitted:-

- 1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
- 2. That the grounds of appeal may be considered as integral Part of the application.
- 3. That the impugned action of the respondents being void abinitio, illegal and the result of mala fide and the appellant has a good prima facie case in her favor.
- 4. That the appellant is sanguine of her success in the case and the balance of convenience lies in her favor.
- 5. That if the impugned order is not suspended the appellant would suffer an irreparable loss.

It is therefore prayed that on acceptance of the application, the respondents may kindly be directed to release the current salaries of the appellant till the final decision of the accompanying appeal.

Dated: 23/05/2013

Inrough

Umer Zad Shah Bukhari



AFFI DAVIT

I, Basreen Bibi D/O Raj Ali Khan, PST Teacher GGPS Kotka Mira Jan Dandi Wazir, Bannu do hereby solemnly affirm and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from the honorable Tribunal.

· Identified by

DEPONENT

Umer Zad Shah Bukhari

Annexune-A



OFFICE OF HE EXECUTIVE DISTRICT OFFICER, ELEMENTARY & SECONDARY EDUCATION BANNU

APPOINTMENT ORDER

On acceptance of Departmental representation fitted by Mst. Basreen Bibi D/O Raj Ali Khan and thoroughly examined the case of 15 untrained teachers and objection raised by trained candidates in the light of decision of Honour Peshawar Court bench D.I.Khan in writ petition No. 124/2005 decided on 30/05/2006 and in the concept of equality of law and after recommendation of the departmental recruitment committee constituted for male PTC teacher, the undersigned is pleased to appoint the following female candidates on humanitarian ground from union council as PTC in BPS noted against each as per PTC recruitment policy plus usual allowances as admissible under the existing rules/ policy in the schools noted against each candidates from the date of taking over charge in the best interest of public service subject to the terms / conditions below:

Γ	S.No	Name of	Father's	Address	BPS	Place of	Remarks
	•	Candidate	Name			Posting	
	i i	Basreen .	'Raj Ali	Azim Killa	07	GGPS Kotka	V/ Póst
	,	Bibi .	Khan	Jadid		Mira Jan Dandi Wazir Bannu	

TERMS & CONDITIONS

- 1- His/ Her service will be considered regular bat without pension and gratuity in term of Section-19 of NWFP, Civil servant Act, 1973 as amended vide NWFP, civil servant (Amendment) Act, 2005. He will however be entitled to contributory provident Fund in such a manner and such rates as may be prescribed by the Government.
- 2- His/ Her services will be liable to termination on one month's notice from either side, in case of resignation without notice their / his two months pay / allowances shall be forfeited to Govt:
- 3- The appointee should submit their charge report to all concerned.
- 4- His/Her services can be terminated at any time, in case his / their performance is found unsatisfactory during probationary period. In case of misconduct he/they will be preceded against under the NWFP removal from service Special ordinance 2009 & the rules framed from time to time.
- 5- Charge should not be handed over if age of the candidate is below 18 years or above 35 years as per Govt: policy / rules.
- 6- The appointee is directed to perform his duties in his respective school noted against his name for a minimum period of one year.
- 7- In case of fake certificates / Degree or any other mistake in the said appointment order detected later on the undersigned reserves the right of amendment them service and disciplinary action will initiated against the teacher concerned.
- 8- He/ She is required to produce health & Fitness Certificate from the Medical Superintendent concerned before taking over charge.
- 9- His/Her original certificate Degree should be verified from the Concerned Board / University / Institution on his own expenses before the release of their pay.
- 10- His/ Her Pay shall not be released before verification of documents.
- 11- The appointee are directed to completed her PTC course with in six years otherwise her appointment will be considered as cancelled.
- 12- No TA / DA etc is allowed.

Sd/
*(BAKHTULLAH SHAH)

EXECUTIVE DISTRICT OFFICER,

ELEMENTARY & SECONDARY

*EDUCATION, BANNU.

Endst: No 23000 - 5

Copy for information & necessary action to the:-

- 1- Secretary Education NWFP Peshawar.
- 2- District Coordination officer Bannu.
- 3- District Office (F) E & S Edu; Bannu
- 4- District Account Officer Bannu.
- 5- Headmistress GGPS concerned Bannu
- 6- Candidate Concerned

Dated Bannu the 31-12-09

EXECUTIVE DISTRICT OFFICER, ELEMENTARY & SECONDARY EDUCATION, BANNU

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چارچرپورك

میں سی امساق لعبرین ولدادخرا راج علی مان سکون عظم علم حاربر الله الله علم علم علم علم علم الله الله الله الله ا

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غمر 31-12-2009 مورند 9000-12 بحسان البي عهد عاجارى المرائز برائرى سكول مير المرائل فان فريول المرائز برائرى سكول مير المرائل فان فريول المرائل المرائ

مين قبل العدازدويم مورخد مده عرصه ما مين قبل العدازدويم مورخد

وسخط جارج كنيده د سرده المام المعربين الم العربين الم العربين الم العربين الكام الكا

٢) مقام: كويد ميرر جان فان فيون كل مقام: مقام: مير كار بار باري

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ىخدمت مناب آبلىز كلىسىدى ئىسكىد دا كورسى آفسى ماهب ملح سون.

عنوان: تنعواه ادائمگی هم شره بقایاهات و کرنگ ما بهوار تنخواه.

الالدسينم

کزارش محمود الاد هیکم من سائلم کی تعیناتی بختیت ۲۵۱ بودخ ۲۵۱ و ۱۵۱ میلام سرهبی ہے . اور ۲۹۹۶ میلامان خان و صندی کلم میں ۱۵۱ و ۱۵۱ و ۱۹۹۸ میلام میلام میل با مال تخواه کی ادائیگی سے محدوم سوں محامل ایل بی میل تا حال تخواه کی ادائیگی سے محدوم سوں مجانک ایکی تک مذکورہ سکول بی سائلم این دُلولی اَ حسن طریع سے سرانحا کر دی میل بی میل بی میل بی اور ایکی تک دعی تخواه تو کی تردیجی بی نا اور ایکی تک دعی تر نشانی تا سامنا کری بردیجی بی نا می مینگائی کے دور میں سائلم کو د هن بر دیتانی تا سامنا کری بردی بی بی اور میں سائلم کو د هن بر دیتانی تا سامنا کری بردی بی

لیمدا بزدیم درخواست التماس کیجائی۔ کہ سائلم کی عوشدہ تخواہ بھے ماہدا بزدیم درخواست التماس کیجائی۔ کہ سائلم کی عوشدہ تخواہ بھے ماہدر فرمافین ماہور فرمافین ماہور کرنٹ تخواہ کی عدم معلم ماہدر فرمافین ماہور کی ماہدر فرمافین ماہور کی ماہدر فرمافین ماہور کی ماہدر فرمافین م

Alphul

عين لؤازش بلوتك

فقط عود فع . ١٥٥ - ١٥ - ١١٥ أ

- نوسا

سائل دهندی کا ۱۹۹۹ مراهان خان دهندی کم مناع نون.

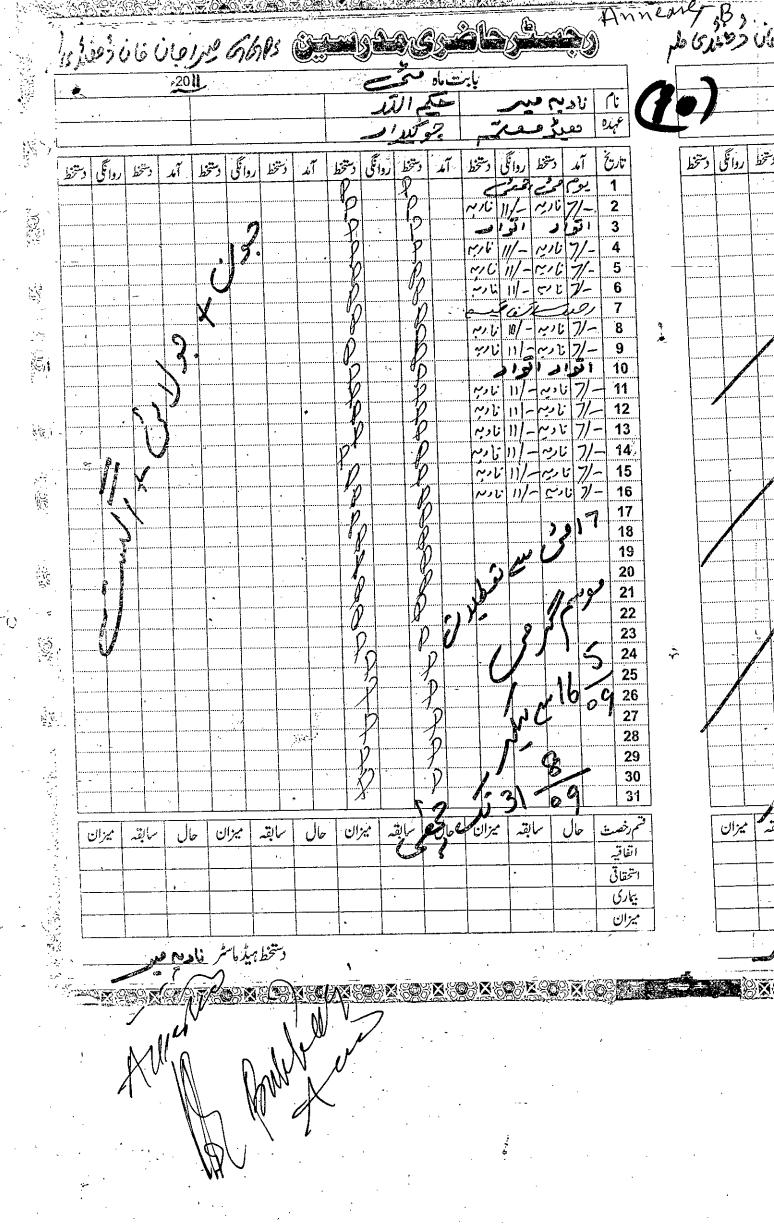
فزمت من الريس و المريس و المريس الموسن أمسرها . على الموسن المريس المري المؤن المروز ورفورست مایک جمع شره تخویس میم کرنگ عاموار آنجوره و ادر آسی ازری ذی ی غرد: - سر کرایی ما ما کو متحوره سن مل ع نرد. و مرم عجب عمورة مرم 24 كوم لنس نفس سكل براكا دوره كي كل. أس كورن تفليف كا ذرك . حس برأس عام . كم ساحه ونسروالي ودر اور با امان کوں ہے. رمنت در رہ من کو سنستن کردیک آئے کو جو شرہ تنخواس اور کرنگ تنخورہ مل عامل غرف رس سے ملے میں مشدد ار در فرر سی دی تھی ۔ کسی کا مال کو سی سن مگ ک نے کارے میں کہ کو جمرف عدالت کے علاوہ فکے سراکو کا مسیارا نہ رہا۔ رس لے بن ، رمن ارمن آر عفر من ان تو ما تد عدالت کا درورزه کوهکا و نک کنرر درشر ما که ما که کی ملع متره تخواه ، ما مودر رند تنخواه دینے ارف کا مادر فرماوس Alland My B. M. M. 05 pre d'aire à in 0000 100 40, ps سا مد لعبر ش ل ا ۱ م ۱۶۶ .

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نام ناد بح تاريخ وستخط آمرة وستخط روانكي رسخطا الأرتج آمر وانكي رسخط وستخط 'رستخط 191 1 فكرالم 2 12/-7/30 کارسے 7/30 ئادىم P 7/3: 3 ن ديم ρ 7/30 بربن P ئا دىپ 4 7/2 N, C /2/-7/2 يرين 5 7/30 نادير 7/3 7/3 10/20 7/30 67 4 10/30 P كرس 7/3 7 P 7/3. 8 اتو א קית 9 10 7/3-ناريم 11 12 12/-13 P 10/3. 14 الو 15 16 צו קנש Noh 7-3 17 ى دىر 18 7:30 23° 19 PPP نما ولي 7/30 193. 20 اون 10/20 7/20 ر زم 7-30 21 اتو 22 1 مزا دم 23 (1/20 نادلع 7-3 12/-P 24 7.3' 25 26 P 27 といい 10/30 مادير 28 29 0 12/-30 P 31 12/-أَحَالُ * تُعالَ : منابقة ميزان سابقه ميزان ميزان سابقه حال. أَمَالُ. بمابقه ميزان اتفاقيه استحقاقي باری . ميزان د شخط ہیڈ ماسٹر <mark>ما دی میں</mark>

یثمع سٹیشنری سٹور 8 اُرد د بازار لا ہور۔

بدانت مناب سول: عماصل کرنون معالت ماب سول عمامه منول - ، م 15 5-1272 me 22-3-12-3- 46 pm ماهٔ لسمه بی و ختر سعیدالرهن PST ریولی تخ هندی کله وز سر دا فعی در ومیل سرن ماہ تر بنہ بی بی دفتر دیرہ کی TST کے سرى فيك درفعي د معلى بنون سے نبرین می دختر راج علی مان کے عظم مكر المرير در فنى حروميك نوى جدعثارت VERSUS م ح المرسكي و مركز من المنسر في المركز المر سيريشي لفيم موس ينوفواه المياور يَ الركاد المحاولات المسركيل كالمسركيل كالمس ول ر كا فراد المنسر فيل سليل الجعري أفسى تحل 4ATTESTED

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د دی براد مرور در کری رستوریم بری مون کر مامزین والمالی ن Remonts de cro 52003 per l'incice de pres CBS FP PTE PST JOUNGES OSE DSE DPC كني بني- الأنوار با عوري رنوري ما عدمان فرالفي منفي اطاكر ت د دور رای د م بر دیگر آدی را د و بردانه کی ماند Annual guerements Cleps call Colin و شخواه ما و ملیر کرنے مستحق میں فررار میں فورار أرردول في على من توله و فاردا و وفا كرن (ا ع مراعلی م بنر بنی ی بند بنا یا جاوے Provious Arrays 61/6/ injuly is to Cuodia William (i) (i) Williameld (i) (ii) i مقوردفر) دادرس نرز ما رانا فندف موس دولس د ریگولتنزی امنی ری ملوک مرمنی بر برتی افعال Cles e Ci cue croje Mala Fide 191219 circles Delse Sin monthly Salary 1/20 مر رق المراب مي 25 كوي المان ورزى م لنبرا از فار و ست دیم می ماند از این می دادرسی کی الم دادرسی کی الم دادرسی کی کی می دادرسی کی کی می دادرسی کی کی می مین برفندف وی علمی هم وی میلیم میلیم هم وی میلیم هم وی میلیم میلیم هم وی میلیم می Lower Court Banny 21-173 Judigité (100 la cos) 5 malés - B 50

Joining Od Sty Ist Stevious Arrear

ت الروز ديم المنزه دهوين في كالقفع مقدس legal obligation 02000 necession is suite so pri اداكرين اور اي فرالفي وكابق ي نون اداكر ع على س معنوری کایم نر (یس بی مویان بر فلاف عرعلی د عدى من دُر ى فكر افن ى دواى دي كالرى بري فول المعامل 3) के के के कि के कि के कि के कि का का का कि के कि का का का कि कि कि का का का कि कि का का का कि कि का का का कि 22/3,12 Sizi Cegal obligationes en ce constante de Class Juper of No101) Pelense 24015 Svien ك فرالقى سفى ميى غريمي في ميرافت راور الرائين ر فاوت نه دُ الي جَيْ مِرْنُ بِرِهُ اللهِ فَ عَنْ عِلْمُ عَنْ عَلَى مِعْ وَفَحْ فَوْتُ مِنْ اللَّهِ فَا عَرْفُ وَ الْ ما لیث محدم لوفی کورٹ میں عاليت متعدم لوهم الفتيا راءاءت ABC PS 15+15+15 ABC Rs 2004 200 + 200 - يركم ما فدعين ، على علم عرح سيريري الحوث وي الروول مع عافلهم ا DPC-DES 1557 Suprate Single, & sointly Copying Agency ower Court Baan 21-773 Gr. J. 218.4.09 2 2 p. 04.07 = 12 Jim & 36 Appointment, Que 2 9 (15-00 () si ci cios com Collection of opening is in orders

بالله ورى درا كالدوراني وفي المسال - صابعات والماني ماندوري المانية Als Tention (Sie Clos) sirole 100 196 Crist - On 4 1/1 25 - به كم لعداز تورى عولان و الله على المربعل ا معاملی نبواکرنگامیلی کو فوالی کی کمی PTe میرک زیرا میلی کو فوالی کی کمی PTe میرک زیرا میلی کورک ترسي لورد رس لفرين (در ما مي اله موه في العرف في العربي ال الماني من الله والمان والم والردي عق نزاني ابني والم Separate ou ses sisse a liptoce en 18.4.09 por Le Catagories icisels esse sissi Individuals 3 كى لۇرىدى قىلىف توارى مۇرى بېرى قىي مېرى راردى تېركى ئۇلەن Colone of land of city of the fire مراج مي ويم الحراف العراد راي العراد قعاصر عبى اسلے وہ ر عرد تنوی یالی در آرین ما کسی corrent à Previous Clodisiés 6/5/10/69 و المادات المان من من المان ال 29 COCI 6 6 100 6 1973 OCT 6 - 6 Pl Shood No 5 V

تخواعی عصوفے۔ اور ادام زی دان اور بند زی دان عربانسی در در می دی الادمار ع - عنون اور المن كا خاط مين تولوها. كا نهرا الم الما الوي وك نسي- فعاولتم نم دنيا اور فعاني أوري افري العيركي رام كاران Force برازان فراند فران فران فراند الله من المراس فانونی بدا فتی در قرام بین اور اس شم افرام منری نونی ملعدمین در خرا ملی از ما ناماز ما ناماز ما نامان جویم ما موتون را در موترون موترون می 5 - 2 dasio 5 2 al all 16 - 2 - 1 Con 11 che min of 100 bille را رهم دی مناسان کی کی فرادا ۔ مامیماں کو دیکر معرفی کرم 1976 s Previous Arrews OF Cur (150 in C 122 Coulding reford of 1916 gir Charing المرعد الله عروره بالمرادات كالمرادات كالمرادات المرادات المرادات المرادات كالمرادات كالمرادات المرادات المرادات كالمرادات كال مُ الكاردُ زُورى در الحرات و من الكانك ادر كم راع (عدد با من اسما تعسا كوشتى، تنوال مزال اور بول - Coo con Toje o' just o' pelis يم كمن عوى ازماء وهي عدر ازار المرام المراسية الم 2 - po los jel cips in en los jel 18/2 9- يم كم كالي مقدم لوفي كورث في وافتيارها مدر دوج فزان Copyline of the support of the copyline of the support of the copyline of the support of the sup Over 1/2 the constitution of Dec. Dec Chin من عفى في اور مم مرك مرك ارع مهال المؤرس عمل رىكاد دُرنتم زُوم لى يىنى كى كى كى ما بىنى يىنى 100 050 05 0 5 × 6 - 100 مرفلاف مل عمر وجمعودهما روما 22 3 12 KMBW 19-3.2012 chares milée بزران ولا کی برزی و کی ری انبردسی شی 192012 (203 (2) 00) Mangary ट शिक्षिति विश्वीति के नि Copying Agency كرفع مرانبه وعنودوك ما الرعار مع و ليفني يه روس ا درا _ عي مي الله وسد & Registration No. 19-123 e. Brossessan 2/123 6. Date of Recognis 21-173 · 接收的 斯子特别。 22773 6. Gote of Boltvery ! 6. No. of Copies / Williams سال كي دسيده موان * HAME & FOR ELL. The same of the sa 8. Udjandor - ---9. Wotal Fee 12 30 Signature of Copyial 2

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BEFORE THE COURT OF CIVIL JUDGE NO. III

BANNU

5-1272 Me 22-372 Ce 36 Ri

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NASEEMA Etc

Versus

EDO (Education) etc

Replication on behalf of defendant 1 to 02 & 05

- 1. That the plaintiff has got no cause of action and locus standai to bring the present suit before this learned court.
- 2. That the present suit is not maintainable in its present form.
- 3. That the plaintiff has not come to the court with clean hands.
- 4. That the plaintiff has come to the court with malafide intention /fraud.
- 5. That written statement may be considered as part and parcel of the replication.

Respectfully Sheweth:

- 1. Para No.01 of the application is correct to the extent that the suit of the plaintiff is pending adjudication before the learned court. Rest of the para is incorrect.
- 2. Para No.02 of the application is incorrect.
- 3. Para No.03 is also incorrect whereas all the ingredients of temporary injunction are tilt in favour of the defendants / respondents.
- 4. Para No.04 of the application is also incorrect.
- 5. Para No.05 is also incorrect.

is therefore requested that the application of applicant may be dismissed with cost.

Respondent/defendents1,02 & 5

Through representative

Through Government Pleader

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BEFORE THE COURT OF CIVIL JUDGE NO.III BANNU.

7-1272 Maseema 22-272 (46) 46 (23)

1428 (6)

Versus

EDO (Education) etc

Written statement on behalf of defendant No.01, 02 & 05

Preliminary objections:

- 1. That the plaintiff has got no cause of action and locus standai to bring the present suit before this learned court.
- 2. That the present suit is not maintainable in its present form.
- 3. That the plaintiff has not come to the court with clean hands.
- 4. That the plaintiff has come to the court with malafide intention and fraud.
- 5. That the present suit is also bad for mis-joinder and non-joinder of necessary parties.
- 6: That the appointment letter is fake one, and other documents is a result of fraud.
- 7. That since 2006, no female PST/PTC appointment have been made by the defendant No. 1 in district Bannu.
- 8. That the defendants have right to claim special cost from the plaintiff
- 9. That the suit of the plaintiff is liable to be dismissed under order of rule 11.

Facts:-

1. Para NO. 01 of the plaint is wrong and malafidE one. Further stated, for appointment of PTC teacher under rules no need of approval is necessary of the defendant No.2. PTC post is district cadre post. Defendant No.1 is competent to make appointment of PTC after the approval of DSC.

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- 2. Para No.02 of the plaint is also incorrect. Further stated that the plaintiff have never been appointed by defendant No.1. Plaintiff No.3 also applied from Union council khander khan khel in the wake of advertisement dated:18/02/2010 and has been placed in serial No.21. In this regard appointment has been made by defendant No.1 on 23/04/2012.
- 3. Para No.03 of the plaintiff is also incorrect and is based on exaggeration. As stated earlier, no female PTC teacher as ever been appointed except in 2006. Defendant No.1 made appointment of PTC female on 23/04/2012.
- 4. Para No.04 is also incorrect.
- 5. Para No.05 is also incorrect. The plaintiffs have never been appointed.
- 6. Para No.06 of the plaint is related to the constitution of Pakistan and the ruling of the apex court.
- 7. Para No.07 is also incorrect.
- 8. Para No.08 plaintiff has got no cause of action against the defendents

9. Para No.09 is legal one.

10.Para No.10, since the plaintiffs have never been appointed by the defendents. No record of the plaintiffs exist.

) <u>Prayer</u>:-

It is therefore requested that the plaint may be dismissed with cost.

Defendant 01,02 &05

Through Rep:

Through Government Pleader

Certificate

Certified that written statement/replication is correct to the best of my knowledge and nothing has been concealed from the learned court.

Defendant No.01

| Defendant No.01 | Pressure of Cooyiet | Pressur

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IN THE COURT OF AURANG ZEB KHAN, CIVIL JUDGE-V, BANNU.

Mst: Naseema Bibi etc VS Sec: Education Deptt: etc Civil Suit No.46/1 of 2012

<u>Order---10</u> 05-12-2012

The learned counsel for the plaintiff is present. No one is present on behalf of defendants. The perusal of plaint shows that the plaintiffs are civil servants and in this situation, this court has got no jurisdiction into the matter in hand, therefore plaint is returned U/O-7 rule-10 CPC to be presented to the court in which the suit should have been instituted. The Muharrir of this court is directed to return the plaint in accordance with law File be consigned to record room after completion.

Announced. 05-12-2012.

(Aurang Zeb Khan) Civil Judge-V, Bannu.

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of an only port of the sun of the - de 15 - de 15 de 16 de 2009 es 31 de 16. 1,00 (20 (1)) - 9 Cos (4,10 by 5 may) junio 2 2 é de pire 2009 01, in 15/10 601 or Michall and John My 100 165 3 (h.) () (Laeko) Junisdech 3/6 Note. 15-2-2013 2666 2000 (20) Proventus Amer به سام نیرمنه می دفتر در دس کا فائر رفند گرمز نیرازی تولی میررده و در در ما ما مرد مرد

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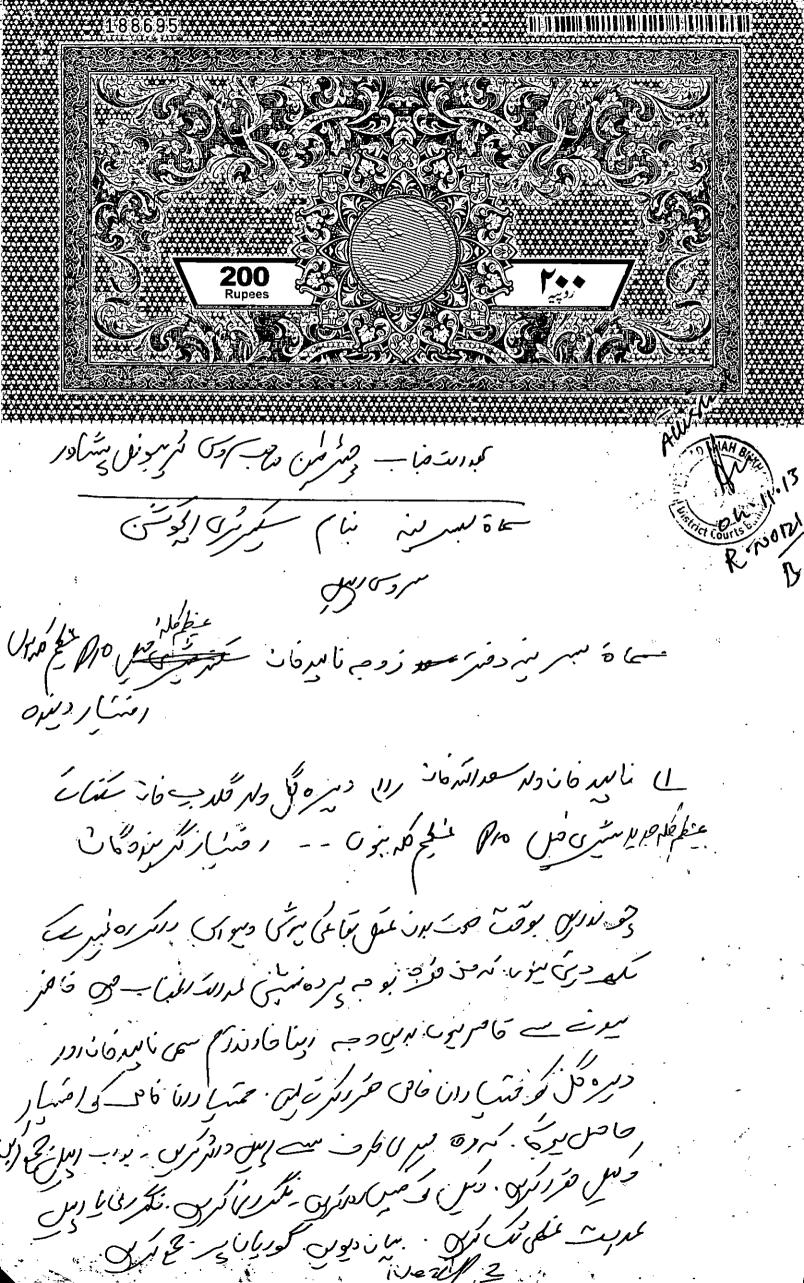
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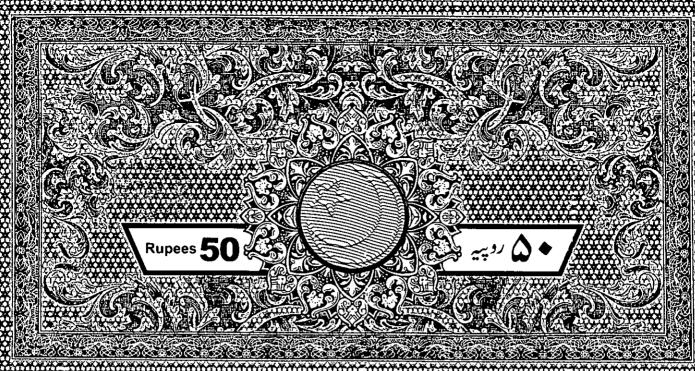
مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسے پیروی وجواب دہی وکل کارروائی متعلقہ ان مقام بنول کے لیے عمر زاد شماہ بخار کی ایپر و کبیٹ / پیلیٹر مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کاکامل افتیار ہوگا نیزو کیل صاحب کوراضی نامہ مقررثالث و فیصلہ ملف دے جواب دہی اوراقبال دعوی اور بصورت ڈ گری کرائے اجراء وصولی نقذ بذریعہ چیک عرضی دعوی اور درخواست ہر قسم کی تقیدی زراس پر دستخط کرنے کا افتیار ہوگا نیز بصورت عدم پیروی یاڈ گری کے طرف یا اپیل کی برآ مدی اور منسو خی وائر کرنے اپیل گرانی و نظر شانی و پیروی کرنے کا افتیار ہوگا اور بصورت ضرورت مقدمہ کی برآ مدی اور منسو خی وائر کرنے اپیل گرانی و نظر شانی و پیروی کرنے کا افتیار ہوگا اور بصورت ضرورت مقدمہ نہ کورہ افتیار است حاصل ہو تھے اور اس کاساختہ پر داختہ منظور و تجول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا اس کے مستحق و کیل صاحب ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا اس کے مستحق و کیل صاحب موصوف ہو تھے نیز بقایا و خرچہ کی وصولی کرنے کا بھی افتیار ہوگا اگر کوئی تار سی نے بیشی مقام دورہ پر ہو تو و کیل صاحب معتمون و کالت من لیا، انہی طرح سمجھ لیا اور قبول و منظور ہے۔

Accepted Williams

العبد كعرمين و گواه شد حسراً که لیس ک

محنور فن مرمین می میرس می میرس کرای از ا مرمن بیجه می ریمونین میرین بیجه می ریمونین درمذاست مراد دنسے و نراوزن 14/01/2019 - 6-31-ماست فعالم الم ساموري 2 med الله المنافي ب مندس ال ماد مد المنافي بي مندس المومي المرابع عندال المومي المرابع المر ٠ ١١١١ (الراجن مون مورف ١١٥٤-١٥-١١) ١١١. : به د منوره ما د بخ بر محید میں درانتی ی معنی مے ۔: .. بدر مدمول کو دس نے سیوری درفل کر درا نے بہتے۔ نبس شامانی -روی میران متدمه مال سی سیسوری صبح روزه می شی می : . کوک میران متدمه مال سی سیسوری صبح معن مین ماری مین بازی بیشتی بور در در در در بازش استان از مین از - 2000-1910/19/ ے ہوں منبور د منول رسنے ہے۔ ارزی ارزی دفتر رومی از این این بنول





کوران معنی ترج عزی می می اوران معدر دور بست به به میسی اس می در بی می در بی می در بی می در بی در بی می در بی در ب

بارر دور کان در دو کان کسیا بار در داری کانبو

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTOON KHWA, PESHAWAR

Service Appeal No. 948/2013

Basreen Bibi

V/S

Govt of KPK

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS:

Respectfully Sheweth!

Preliminary Objection on the appeal:-

- 1- That the service appeal of the appellant is badly time bared.
- 2- That the appellant has got no cause of action and locus standi.
- 3- That the service appeal is bad for non joinder and mis joinder of the necessary parties.
- 4- That the service appeal is suffering from legal defect.
- 5- That the appellant claims her appointment order in December, 2009 while she files department appeal in 2013 which shows clear malafide intention on her part.
- 6- That the appointment order of the appellant is totally fake and having no record with the respondent.

FACTS

- a. Incorrect, the respondents have not made any appointment orders in 2009, hence respondents disown her appointment orders.
- b. Incorrect, the attendance is fictitious and fabricated and the same has not been signed / countersigned by ADO (Circle), Dy: D.O and DEO Bannu. The respondent conducted a fact flinging inquiry in which it is proved that no record with respect to the appellant appointment is available and the appointments orders are totally bogus. (Copy of the report is annexed as A)
- c. Incorrect as in above.
- d. The para related to court record.
- e. Incorrect.
- f. Incorrect.

GROUNDS:

Incorrect. The appellant is not entitled for any relief on the basis of bogus order.

- F- Incorrect as per para No.2.
- G- Incorrect.
- H- Incorrect.
- I- Incorrect. Respondents have treated the appellant in accordance with law.
- J- No comments.

It is therefore, very humbly prayed that the service appeal of the appellant may very graciously be dismissed by this Honourable Tribunal.

District Education Officer (Female)

Bannu

E & SE Peshawar_

Secretary E & SE Peshawar Ameetre #

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BANNU

Subject:

Fact Finding inquiry report/investigation in service appeals titled Basreen Bibi, Samreena Bibi, Sohaila Zafar, Shehnaz Begum, Fehmida, Farhad Begum, Saira Bahader.

It is submitted that the above titled service appeals are pending adjudication before the honourable service tribunal Peshawar. That all these service appeals of the appellants were thoroughly investigated/checked by this office but were found bogus, fake and having no record at all. The Endst: Nos present on their appointment orders are fake as well as record less.

Again, That this office has never issued single appointment orders except of court orders. The appointment orders claimed by the appellants are highly fabricated and record less. That the appellants try to enter in govt. Job with fraudulent means/sources. This department highly repudiates their appointment orders. That the dates/years in which they claim their appointment orders, it is pertinent to be mentioned here that this office has never made such orders in respect of female candidates, in the period/years which they claim.

1.

Member

4.

Femal Bannu

Member

Asstt: Distt: Office (F) Primary Banni

Copy to:

- 1. Registrar Peshawar High Court Peshawar Bench Bannu.
- 2. Registrar KPK Service Tribunal Peshawar.
- 3. Senior Govt. Pleader KPK Tribunal Peshawar.
- 4. Senior Govt. Pleader District Court Bannu.

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTOON KHWA, PESHAWAR Service Appeal No. 446/2013

Basreen Bibi (Appellant)

Govt of Khyer Pakhtunkhwa

AFFIDAVIT

I, Mr. Ashrafullah Khan ADO (Litigation), do hereby solemnly affirm and declare on Oath that the contents of the comments / reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

Deponent.

Jesoment.

لسرات في كروس روس ريول كون البين ـ ليرن في أنه الركافي رسارتوس جواب الجواب ١- فروع ا علاطربر لالله ١٤ و أو أو لفال لوهارال 2- 200 6610 csos 30 318 - 28/16/10/10 1/2/ 000 - 2 و قتا فوقاً المعادر العدور ما ميك رسان كي هو تنز المرائل (14 20 12 Con Jose of 18 11 18 11/10 3 - 1/2/1/2) لى فعلى لجد أن أور بن بر فرائح م كونية (م) مرما كمت ر نواسر کا در ورث مرات کرے مسالی در ورش کنوه کا مَرْدَقُ ایْ الله ما مَرِي الله ما مع الله ما مع الله ما مع الله ما مع مقوم مما رخوم هو و و و و و و المام مين م عرم و المره ا مرابع سانوری میا بو مام ده انوایس میرا سافیدی العالم العالم الموجودي ما فوس بوت الوالم المالية ما المرس الم المراد ال ما فتاركي جاز افعارني عدى كي. المراوي في المراب المرا - اردر ور کا در ایرای میقان مقال کوان ایرا کو व रिएउट्या केंग (Sheet MI 2)

4- مِن مرى ق ج مول كورك تيون رمي ترمي كرده و الله برا اسلام و الموا وسيول ل در دلوس تودالم ه كم اسمان برو عادل كول مر وند معامل به و ما مر مرا مراس من م . Of one a Marthy Pay & Salaries Cipinion المسلمة المرون والمرون عادس ادر ب ورروس مربول كوريوك الميارات الميارات المول أربيول على الميارات المول أربيول على الميارات المول أولي المعاراة ومن والموالية ومن الميلان ما فوق ع في الموالية ومن الميلان ما في الميلان الميلان ما في الميلان الميلا ر من و نبرات معمد على الم الوزل في فالم هو الممن المين في المرين Jesofle (1) le l'élésée (élévir) l'élésée le les Odkin en of on Mala Fide Se sistement de la sistement de la se sistement de la seconda Opé ABe Faets (19) Tues DEF. N'SISTES OF الموارثين عاد واب د عوا فانبار الماريز من المورق الموروي م كالسي م و في المواد ا فريد المريدة ا Derhal Signification of Signification of Significant S

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTOON KHWA, PESHAWAR

Service Appeal No. 948/2013

Basreen Bibi

V/S

Govt of KPK

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS:

Respectfully Sheweth!

Preliminary Objection on the appeal:-

- 1- That the service appeal of the appellant is badly time bared.
- 2- That the appellant has got no cause of action and locus standi.
- 3- That the service appeal is bad for non joinder and mis joinder of the necessary parties.
- 4- That the service appeal is suffering from legal defect.
- 5- That the appellant claims her appointment order in December, 2009 while she files department appeal in 2013 which shows clear malafide intention on her part.
- 6- That the appointment order of the appellant is totally fake and having no record with the respondent.

FACTS

- a. Incorrect, the respondents have not made any appointment orders in 2009, hence respondents disown her appointment orders.
- b. Incorrect, the attendance is fictitious and fabricated and the same has not been signed / countersigned by ADO (Circle), Dy: D.O and DEO Bannu. The respondent conducted a fact flinging inquiry in which it is proved that no record with respect to the appellant appointment is available and the appointments orders are totally bogus. (Copy of the report is annexed as A)
- c. Incorrect as in above.
- d. The para related to court record.
- e. Incorrect.
- f. Incorrect.

GROUNDS:

Incorrect. The appellant is not entitled for any relief on the basis of bogus order.

- F- Incorrect as per para No.2.
- G- Incorrect.
- H- Incorrect.
- I- Incorrect. Respondents have treated the appellant in accordance with law.
- J- No comments.

It is therefore, very humbly prayed that the service appeal of the appellant may very graciously be dismissed by this Honourable Tribunal.

District Education Officer (Female)

Bannu

E & SE Peshawar

Secretary E & SE Peshawar Annex:

Subject:

Fact Finding inquiry report/investigation in service appeals titled Basreen Bibi, Samreena Bibi, Sohaila Zafar, Shehnaz Begum, Fehmida, Farhad Begum, Saira Bahader.

It is submitted that the above titled service appeals are pending adjudication before the honourable service tribunal Peshawar. That all these service appeals of the appellants were thoroughly investigated/checked by this office but were found bogus, fake and having no record at all. The Endst: Nos present on their appointment orders are fake as well as record less.

Again, That this office has never issued single appointment orders except of court orders. The appointment orders claimed by the appellants are highly fabricated and record less. That the appellants try to enter in govt. Job with fraudulent means/sources. This department highly repudiates their appointment orders. That the dates/years in which they claim their appointment orders, it is pertinent to be mentioned here that this office has never made such orders in respect of female candidates, in the period/years which they claim.

Member

Femal Bannu

Asstt. Distt: Office (F) Primary Banni

Copy to:

- 1, Registrar Peshawar High Court Peshawar Bench Bannu.
- 2. Registrar KPK Service Tribunal Peshawar.
- 3. Senior Govt. Pleader KPK Tribunal Peshawar.
- 4. Senior Govt. Pleader District Court Bannu.

4- من مرى ج مرى فرن شون زمن مرسى كا دغى دست براء اسلاني ورا مر بیونل کی در رلوس تو دا جم به میمینی بروسی دار ایس مروند معد معد من مرا توبد الموبد الم المراق و المراق (1) (1) के के के के कि Os o sed a Marthly Lay & Sularies Cinerio المسرن من وارد الله الموسى والمردان واردائه الموسى والمورد الله الموسى والمردان والم عالم من ادر من ورروس المنس تع اوراس باس المتيارات اوس تربيورا عالم من ادر من ورروس نربون كوريوكي المراه بيارات الموريين رمايف العمارة عَرَقُ مَعَ الْمُعَالِمُ فَالْمِينَ مَا فَوَمَ عِرَالِهِ الْمُعَالِمُ فَالْمُعَالِمُ فَالْمُوالِمِ مِنْ الْمُع مَا مُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُ الله المع المع المع المعالمة ا Edin en of Mala Tide Se d'instrumités Opé ABe Facts 0130 Jues DEF. N. 51/2003 عَنْ وَالْمِنْ وَالْمُ وَالْمُ وَالْمُ وَالْمُ وَالْمُ وَالْمُ وَالْمُ وَالْمُ وَالْمُ وَالْمُوالِمُ وَالْمُوالِمُ وَالْمُوالِمُ وَالْمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُ وَالْمُوالِمُولِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمِيلِمُوالِمُولِمُوالِمُوالِمُوالِمُوالِمُولِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُولِمُوالِمُولِمُولِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُولِمُوالِمُوالِمُوالِمُولِمُوالِمُوالِمُوالِمُولِمُوالِمُوالِمُولِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُولِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُوالِمُ ما لسي م و في اور واب الحاب الحاب العاب المعنية وبنوان عادي المسلمان في المسلم 18 have Sign in feel Str