


08.08.2018

Mr. Nawab Ali Noor Advocate, counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant made a request for adjournment. Granted. To come up for arguments on 10.10.2018 before the D.B


Member


Chairman

10.10.2018

Learned counsel for appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Muhammad Saced S.S for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 22.11.2018 before D.B.



Member


Member

22.11.2018

Appellant absent. Learned counsel for the appellant absent. The present case pertains to the year 2013. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Muhammad Amin Deputy D.O representative of the respondent department also present, however no one appeared on behalf of appellant despite repeated calls. Consequently the present service appeal is dismissed in default. No order as to costs. File be consigned to the record room.


Member


Member

ANNOUNCED
22.11.2018


07.06.2018


Mr. Shaukat Ali, Clerk of counsel for the appellant present and submitted an application for adjournment as counsel for the appellant is busy before Darul Qaza, Swat. Mr. Usman Ghani, District Attorney for the respondents present. Adjourned but last chance is given. To come up for arguments on 02.07.2018 before the D.B at Camp Court, Swat.


Chairman
Camp Court, Swat

02.07.2018


Appellant Umar Farooq in person present. Mr. Muhammad Saeed, SS on behalf of the respondents alongwith Mr. Ghani, District Attorney present. Appellant submitted an application for adjournment that his counsel is busy in other courts. Granted. To come up for arguments on 04.07.2018 before the D.B at camp court, Swat.



Member


Chairman
Camp court, Swat

04.07.2018

Appellant Umar Farooq alongwith counsel Mr. Nawab Ali Noor Advocate present. Mr. Bakht Rehman Litigation Officer alongwith Mr. Usman Ghani learned District Attorney for the respondents present. Learned counsel for the appellant made a request for adjournment that due to some family problems he could not prepare the case. Being an old case of 2013 the case is adjourned however with the consent of the parties, the appeal would be heard at Principal Seat Peshawar as very short question is involved in the matter. Case to come up for arguments on 08.08.2018 before D.B at Principal Seat Peshawar.


Member


Chairman
Camp Court, Swat

05.06.2018

Appellant Umar Farooq in person present. Mr. Muhammad Saeed, S.S alongwith Mr. Usman Ghani, District Attorney for the respondents present. Appellant requested for adjournment as his counsel has gone to Peshawar to appear before Hon'ble Peshawar High Court. Request is allowed.

The appeal being pertain to the year 2013, therefore, adjourned for tomorrow i.e. on 06.06.2018 for arguments before the D.B at camp court, Swat.



Member



Chairman
Camp Court, Swat

06.06.2018

Appellant Umer Farooq in person present and submitted fresh Wakalatnama of Syed Karim Shalman, Advocate, which is placed on file. Mr. Muhammad Saeed, Subject Specialist alongwith Mr. Usman Ghani, District Attorney for the respondents present.

The appellant made a request for adjournment as his counsel is busy in the Hon'ble High Court and could not appear before this Tribunal today. Hence, the case is adjourned for tomorrow i.e 07.06.2018 for arguments before the D.B at Camp Court Swat.



Member



Chairman
Camp Court, Swat

07.12.2017

Counsel for the appellant and Addl. AG alongwith Muhammad Saeed, SS for the respondents present. Counsel for the appellant seeks adjournment. To come up for arguments on 30.01.2018 before the D.B at camp court, Swat.


Member


Chairman
Camp court, Swat

30.01.2018

Appellant in person present and Addl; AG alongwith Muhammad Saeed, Subject Specialist for the respondents present. Appellant seeks adjournment as his counsel is not in attendance today. Adjourned. To come up for arguments on 03.04.2018 before D.B at Camp Court, Swat.

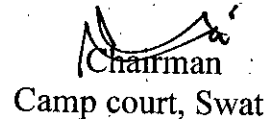

Member


Chairman
Camp Court, Swat

03.04.2018

Appellant in person and Mr. Usman Ghani, District Attorney alongwith Muhammad Iqbal, Superintendent for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. Granted. To come up for arguments on 05.06.2018 before D.B at camp court, Swat.



Member


Chairman
Camp court, Swat

239/2013

02.05.2017

Appellant in person present. Mr. Muhammad Saeed, Subject Specialist alongwith Mr. Muhammad Zubair, District Attorney for the respondents also present. Due to non-availability of learned counsel for the appellant as well as incomplete bench arguments could not be heard. To come for arguments on 06.09.2017 before D.B at Camp Court Swat.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
Camp Court Swat.

06.09.2017

Appellant in person and Mr. Muhammad Zubair, District Attorney alongwith Muhammad Saeed, SS for the respondents present. Counsel for the appellant is not in attendance. Appellant seeks adjournment. Adjourned.. To come up for final hearing on 05.10.2017 before the D.B at camp court, Swat.



Member


Chairman
Camp court, Swat.

05.10.2017

Appellant in person and Mr. Muhammad Zubair, District Attorney alongwith Muhammad Saeed, SS for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. Adjourned. To come up for final hearing before the D.B on 07.12.2017 at camp court, Swat.


Member


Chairman
Camp court, Swat

03.05.2016

Appellant in person and Mr. Muhammad Saeed, SS alongwith Mr. Muhammad Zubair, Sr.GP for the respondents present. Counsel for the appellant is not in attendance. Rejoinder submitted. To come up for final hearing before D.B on .03.10.2016 at camp court, Swat.




Member




Chairman
Camp Court, Swat

03.10.2016

None present for the parties due to notification of public holiday on the eve of first Moharram. w The appeal is therefore, adjourned for final hearing before the D.B to 04.01.2017 at camp court, Swat.



Member




Chairman
Camp court, Swat

03.11.2017

Appellant in person and Mr. Muhammad Saeed, SS alongwith Mr. Muhammad Zubair, Senior Government Pleader for the respondents present. Appellant submitted an application for adjournment as his counsel is not in attendance. Adjourned for final hearing to 02.05.2017 before the D.B at camp court, Swat.



Member



Chairman
Camp court, Swat

14.07.2015

Agent of counsel for the appellant and Mr. Ahmed Sher, PS alongwith Addl: A.G for respondents present. The case pertains to the territorial limits of Malakand Divison as such to be heard at Swat. Representative submitted application according to which the post of DCO has been abolished by the Provincial Government. Appellant shall clarify the position of respondent No. 1 by the next date of hearing. To come up for further proceedings on ~~5.9.2015~~ 2015 at Camp Court Swat.



Chairman

5.10.2015

Appellant with counsel and Mr. Muhammad Saeed, S.S alongwith Mr. Muhammad Zubair, Sr. GP for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 11.1.2016 at Camp Court Swat.



Chairman
Camp Court Swat

11.01.2016

Appellant with counsel and Mr. Muhammad Saeed, S.S alongiwth Mr. Muhammad Zubair, Sr,GP for respondents present. Requested for adjournment. To come up for rejoinder and final hearing before D.B on 03.05.2016 at Camp Court Swat.



Member



Chairman
Camp Court Swat

15.

Reader Note:

31.12.2014

Appellant in person present. Since the Tribunal is incomplete, therefore, case is adjourned 25.03.2015 for the same.


Reader

16.

25.03.2015

Counsel for the appellant present. Requested for adjournment as he is not in possession of appointment letter and verification of educational qualification certificate. Adjourned for producing the same and preliminary hearing to 16.04.2015 before S.B.


Chairman


16.04.2015

Counsel for the appellant present. Certified copies produced and placed on file. Learned counsel for the appellant argued that appellant was appointed as PST on 30.06.2011 and vide impugned order dated 11.09.2012 he was terminated from service on the allegation of fake and bogus SSC certificate. That neither the certificates of the appellant are bogus nor appellant was afforded opportunity of hearing and unilaterally terminated from service. That he preferred departmental appeal on 18.09.2012 which was not responded within statutory period and hence the present instant service appeal on 11.01.2013.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 14.07.2015 before S.B.

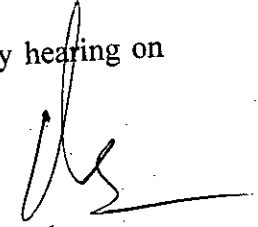

Chairman

Appellant Deposited
Security & Process Fee




11.
29.04.2014

Counsel for the appellant present. Preliminary arguments partly heard. Counsel for the appellant is directed to produce appointment letter of the appellant alongwith verified certificate of his degree from the Board of Intermediate and Secondary Education, Swat. To come up for further preliminary hearing on 05.06.2014.


Member


12.
05.06.2014

Clerk of Counsel for the appellant present. Counsel moved an application for adjournment. Application accepted. To come up for preliminary hearing on 12.08.2014.


Member

13.
12.08.2014

Counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 21.10.2014.


Member

14.
21.10.2014

Counsel for the appellant present, and requested for adjournment. Request accepted. To come up for preliminary hearing on 31.12.2014.


Member

7. 27.08.2013

No one is present on behalf of the appellant. Case is adjourned. To come up for preliminary hearing on 26.11.2013.


Member

8. 26.11.2013

Appellant in person present and requested for adjournment as learned counsel was busy in Dar-ul-Qaza, Swat. To come up for preliminary hearing on 22.01.2014


Member

9. 22.01.2014

Counsel for appellant present and requested for adjournment. To come up for preliminary hearing on 07.03.2014.


Member

10. 07.03.2014

Clerk of counsel for the appellant present and requested for adjournment as his counsel was busy in Dar-Ul-Qaza, Swat. To come up for preliminary hearing on 29.04.2014.


Member

4.
16.5.2013

Munshi to Counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunal (Amendment) Ordinance, 2013 (Khyber Pakhtunkhwa Order No. II of 2013), the case is adjourned on note Reader for proceeding as before on.

12.6.2013.


Reader.

5.
12.6.2013

Appellant present in person. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 8.7.2013.


Reader

6.
08.07.2013

Clerk of counsel for the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 27.8.2013.


Reader

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 239/2013

| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 24/01/2013 | <p>The appeal of Mr.Umar Farooq resubmitted today by Mr. L.Nawab Ali Noor Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 24/1/13</p> |
| 2 | 30-1-2013 | <p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>15-3-2013</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p> |
| 3 | 15-3-2013 | <p>None for the appellant present - Case adjourned to 16-5-2013 for P.H.</p> <p style="text-align: right;"><i>[Signature]</i> Member.</p> |

The appeal of Mr. Umar Farooq received today i.e. on 11/01/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days:-

- 1- Address of respondent No.2 is incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- The authority to whom the departmental appeal was preferred has not been arrayed a necessary party.

No. 112 /S.T.

Dt. 14/01 /2013.

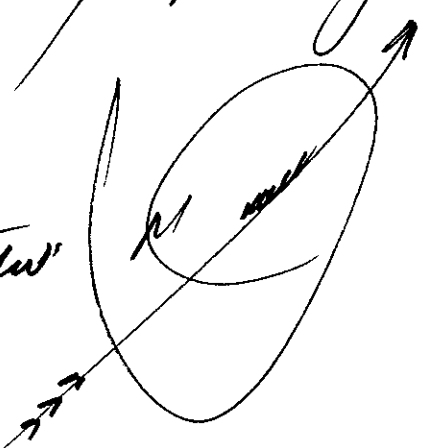

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

MR. L. NAWAB ALI NOOR ADV. PESH.

Respectfully Submitted,

*Needfull doc kindly put before Mr
Court.*

*not it is to be noted that
from FDD & now it is
DEO.*



BEFORE THE SERVICE TRIBUNIL K.P.K, PESHAWAR.

Writ petition NO. 239 of 2013.

1. Umer Farooq PST GPS Shalkyar Bashigram Tehsil Bashigram.

(Appellant)

VERSUS


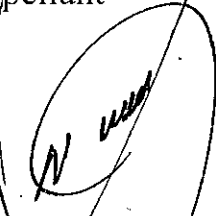
1.D.C.O Disatrick Swat & another.

(Respondents)

Index

| S.NO | Description of documents | Annexure | Pages |
|------|-----------------------------|----------|-------|
| 1. | Service appeal | | 1-4 |
| 2. | Affidavit | | 4 |
| 3. | Copy of termination | A | 5 |
| 4. | Copy of departmental appeal | B | 6-7 |
| 5 | Copy of transfer | C | 8 |
| 8 | Waklat Nama | | 9 |

Through


Appellant

L. Nawab Ali Noor
Advocate High Court
Peshawar.

SE) Swat.

5. That what ever the merit and other requirement for appointment was at that time they were full fill by the appellant.
6. That from the 30.6.2011 till date of termination all the processes has been successfully completed by the appellant.
7. That astonishment to the appellant on 11.9.2012 the service of the appellant was terminated without prior notice or inquiry. *(copy attached as annexure A)*
8. That the appellant termination is illegal , unlawfully, beyond the jurisdiction based on malafide intention because more than one year has been passed and at once the prepaid allegation made by the department is absolutely wrong and just to vacate the post for his blue eyed person.

The appellant filed departmental which no response to appellant hence this appeal before this Honorable tribunals. *(copy is annexure B) except as annexure C.*

GROUND:

- a) That the impugned order of dismissal from service against the appellant is illegal ,unlawful, without authority/ jurisdiction and being based on the mala fide intentions of the respondent department is liable to be set-aside.
- b) That by receiving the above said impugned letter the appellant was just taken by surprise as neither any notice, nor any show cause notice or intimation whatsoever was served by respondent department upon the appellant.
- c) That the appellant was condemned unheard and no chance of hearing/ defense whatsoever was provided as described under the prevailing laws to the appellant .
- d).That no enquiry proceeding has enumerated under the law has aver been initiated against the appellant and just hair and fire policy was adopted by the respondent department , thereby issuing the termination/dismissal notice without any

justification and without adopting any legal processes .

- e).That the manner of termination /dismissal from services adopted in the said cases even not applicable where the rule of master of servant applies, what to say the application of such a short cut procedure for the dismissal of civil servant having there credit spotless service of more than years.
- f) That nether the appellant has committed any misconduct as defined under the relevant laws nor he has been treated according to laws ,thereby neglecting and bulldozing the very basic right of the appellant as enumerated in the constitution of Islamic republic of Pakistan .
- g) That the previous record of the appellant is brilliant and require appellant is not habitual nor any action has been taken against him in previous .
- h).That in the termination letter allegation leveled against the applicant are bogus frivolous and self made and no reality is present there.
- i).That appellant presented his original documents in the time of interview and test even in the time of verification never presented bogus certificate.
- j).That the appellant presented his original certificates in which he got 384 marks .
- k).That the appellant termination is illegal , unlawfully, beyond the jurisdiction based on malafide intention because more than one year has been passed and at once the prepaid allegation made by the department is absolutely wrong and just to vacate the post for his blue eyed person.
- l).That no chance of hearing is given to the appellant , appellant was condemned unheard and the termination was made in hurry.

It is therefore humbly prayed that on acceptance of this appeal the order in question(26.3.2011 may please be set-aside and issue the restoration order of the appellant.

عمر نواب علی نور
Appellant

Through

L.Nawab Ali Noor
Advocate High Court Peshawar.

(Signature of L. Nawab Ali Noor)

AFFIDAVIT

g Umar Farooq PST SPS Shalkyar Beshgram Teh Beshgram
I, hereby solemnly affirm & declare on oath that the contents of the accompanying service appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable court.



(Signature of Deponent)
Deponent.

Ann. A. 5
M

OFFICE OF THE ASSISTANT DISTRICT OFFICER (E & SE), CIRCLE MADYAN,
DISTRICT SWAT

NO 20

Dated 11 / 09 / 2012

To

Mr, Umar Farooq PST
GPS Shaklar, Circle Madyan

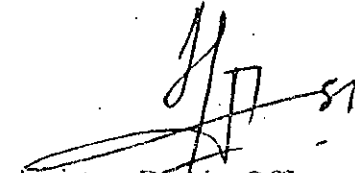
Subject: Termination

Memo

Reference Deputy District Officer (E & SE) Swat letter No 2878 Dated 03-09-2012 regarding you have terminated from your service / job due to fake and bogus your SSC Certificate, verified by Assistant Controller Board of Intermediate and Secondary Education Swat.

You are directed to deposit Rs. 187165/- w.e.f 01-07-2011 to 31-08-2012 into Govt. Treasury on Challan within a week of the issuance of this letter immediately, with information to DDO (M) Primary Swat and EDO (E & SE) Swat.

In case of any delay / irresponsible behavior you will be personally responsible for any consequences.



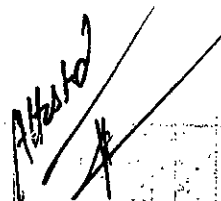
Assistant District Officer
Elementary and Secondary Education Swat

No _____

Copy forwarded for information and necessary action to.

1. Executive District Officer (E & SE) Swat
2. Deputy District Officer (E & SE) Swat

Assistant District Officer
Elementary and Secondary Education Swat



11/9/12

H. B. Bhattar

1. That the applicant was appointed in the education department as PST teacher on 0.6.2011 through proper channel.
2. That the applicant appointment was through proper channel and all processes at that time whatever was for the recruitment the applicant perform / fulfill it.
3. That all testimonials of the appellant was properly verified by the concerned authority and no objection was never raised by the education department.
4. That regarding the appellant certificates completion verification certificate was issued by the superintendent of the DDO(M) (E & SE) Swat.
5. That what ever the merit and other requirement for appointment was at that time they were fulfill by the appellant.
6. That in the termination letter allegation leveled against the applicant are bogus frivolous and self made and no reality is present there.
7. That applicant at the time of interview and test even in the time of verification never present the bogus certificate.
8. That the applicant presented his original certificates in which he got 384 marks.
9. That from the 30.6.2011 till date of termination all the processes has been successfully completed by the applicant.
10. That the applicant termination is illegal, unlawfully, beyond the jurisdiction based on malafide intention because more than one year has been passed and at once the prepaid allegation made by

Respectfully submitted,

Appeal against the termination order dated 11.9.2012 received by the applicant on 18.9.2012.

TO the D O (E & SE) Swat.

Ans 13-6

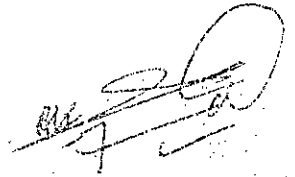
the department is absolutely wrong and just to vacate the post for his blue eyed person.

11. That no chance of hearing is given to the applicant, applicant was condemned unheard and the termination was made in hurry.
12. That all procedure of termination has not been followed.
13. That if there is any irregularity means the certificate presented by the applicant then why all the concern right from the appointment authority till verification clear the applicant.
14. That without proof of fake and bogus degree the applicant was hit which against the basic constitutional right as well as against the civil servant rules.

It is therefore humble prayed that on acceptance of this appeal the termination order dated 11.9.2012 may kindly be set aside and the applicant may kindly be restore on there own post and place.

Dated 18-9-2012

Applicant



Umer Farooq S/O Nowsherman R/O Bashigram, tehsil
Behrain PST Teacher GPS Shalkyar
Bashigram, tehsil Behrain.

Attested
/

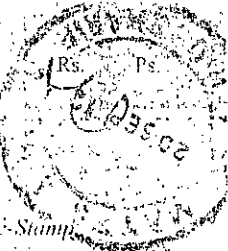
Appeal filed on 18/9/12

18/9/12
18/9/12
18/9/12

18/9/12
18/9/12
18/9/12

10. 329

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.



Annex C-8

Received a registered*

Addressed to

Date Stamp

*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures) *2000* (in words)

Insurance fee Rs. *20* Ps. *00* (in words) } Weight } Kilo
Grams

Name and address of sender

Attended

TOLL =

312

500 + 500 = 10000

20

Answers:

بعد الت

Before The Probation Service

Imrul K.P.Ks Restaurant

بجانب

بنام Ummev Farooq

Versus

D.C.O District Swat A matter

مورد

مقدمہ

دعویٰ

جرم

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام سسرکس سز سبٹونل کیلئے اہل نورا علی نورا ایڈووکیٹ مالکی اور

مقررہ کر کے اقرار کیا جاتا ہے کہ صاحب موہوف کے مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے، و تقرر ثالث و فیصلہ بر حلاف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور سولی چیک و روپیہ اور دعویٰ اور درخواست ہر قسم کی تصدیق

ذرا پیرا پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی کی یاد دہی ایک طرفہ یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ اپنے اختیار کے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساتھ

پر واختہ منظور و قبول ہوگا دوران مقدمہ میں بیخبر چہ وہر چاہے اتوائے مقدمہ کے سبب سے وہ ہوگا۔

کوئی تاریخ پیشی مقام دور پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی

نہ کر کے سز سبٹونل کا اسات نامہ لکھو یا کہ سندر ہے۔

2013

الرقوم

واہ

بمقام سسرکس سز سبٹونل ایڈووکیٹ مالکی کے لئے منظور ہے۔

BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

S. Appeal No. of

1. Umer Farooq

.....(Appellant).

VERSUS

1. Govt of K.P.K Through secretary (E. & SE) Peshawar & others others.

.....(Respondents)

Application with humble request for adjournment in the above titled Appeal NO.

Respectfully submitted:

1. That the above titled appeal is fixed before this Honorable tribunal for 5.6.2014.
2. That counsel for the petitioner is seriously ill due to the operation of stunt pain in kidney and unable to attend this Honorable tribunal for the dated today.
3. That due to the above mentioned reason counsel for the petitioner will not be in position to attend this Honorable court on above mentioned date.
4. That for the above mentioned reason It is therefore humbly prayed that on acceptance of this application this Honorable court may kindly be adjourn the above mentioned appeal for any other date which is convent to this Honorable court.

Dated: 4.6.2014.

Counsel of Petitioner

L. Nawab Ali Noor Advocate
High Court Peshawar.

03469076 945



S.No X 2883

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No 210909

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Saidu Sharif, Swat, N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 2003 (ANNUAL/SUPPLEMENTARY)

UMAR FAROOQ ✓

HOWSHERAWAN ✓

DISTT: SWAT. ✓

THIS IS TO CORRECT THAT
VERIFIED & FOUND CORRECT
Son/Daughter of _____
and ASSISTANT of 07/4/15
COUNTERSIGNED
ASSISTANT SECRETARY (CERTIFICATE)

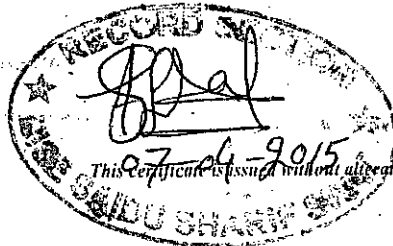
_____ has passed the Secondary School Certificate Examination
Board of Intermediate and Secondary Education, Saidu Sharif, Swat held in
_____ as a Regular/Private candidate. He/She obtained 384 Marks out
of 850 and has been placed in Grade D Representing FAIR

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------|-------------------|
| 1. English | 3. Islamiyat | 5. MATHS | 7. G. SCIENCE |
| 2. Urdu | 4. Pakistan Studies | 6. ART | 8. ISL: STUDIES ✓ |

Date of birth according to admission form is FOURTEENTH JANUARY
one thousand nine hundred and EIGHTY NINE. (14-01-1989)

[Signature]
Asstt. Secretary
[Signature]




[Signature]
Secretary

[Signature]
Attested

[Signature]
LECTURER
Govt. AKL P.G College
Matta Swat.

76519

(2)



BOARD OF INTERMEDIATE & SECONDARY EDUCATION

SAIDU SHARIF, SWAT.



PROVISIONAL & DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION, 2005
HUMANITIES (Part-II)

THIS IS TO CERTIFY THAT UMAR FAROOQSon / Daughter of NOVSHERWANRoll No: 180747and a candidate of Govt. Higher Secondary School Madyan, Swat.

has secured the marks shown against each subject in the **INTERMEDIATE EXAMINATION**
of the Board of Intermediate & Secondary Education Saidu Sharif, Swat held in the
month of May as Regular

| Subjects | Marks | Marks Obtained | | | | | |
|---------------------|-------|----------------|-------|---------|-------|-----------|--------------------------|
| | | Part-I | | Part-II | | Total | Marks in Words |
| | | Theory | Pract | Theory | Pract | | |
| English | 200 | 50 | -- | 33 | -- | 83 | Eighty-Three |
| Urdu | 200 | 46 | -- | 52 | -- | 98 | Ninety-Eight |
| Islamic Education | 50 | 38 | -- | -- | -- | 38 | Thirty-Eight |
| Pakistan Studies | 50 | -- | -- | 28 | -- | 28 | Twenty-Eight |
| Civics | 200 | 48 | -- | 60 | -- | 108 | One Hundred Eight |
| Islamic Studies | 200 | 60 | -- | 73 | -- | 133 | One Hundred Thirty-Three |
| Pashto | 200 | 60 | -- | 61 | -- | 121 | One Hundred Twenty-One |
| Total : 1100 | | | | | | 609-C | Six Hundred Nine Only |
| | | | | | | Remarks : | |

Checked By : *AKHSTEEL*

Note: Errors / Omissions accepted.

Computer Cell BISE, Swat.

Qasim

Controller of Examinations
BISE, Saidu Sharif, Swat.

AKHSTEEL

LECTURER
Govt. AKL P.G College
Matta Swat.

3

S.No

2824



Roll No 180747

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Saidu Sharif, Swat N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

HUMANITIES Group

SESSION 2005 (ANNUAL/SUPPLEMENTARY)

THIS IS TO CERTIFY THAT UMAR FAROOQ

Son/Daughter of NOWSHERAVAN

and a student of GOVT. HIGHER SECONDARY SCHOOL MADYAN SWAT.

Registered No 25-B/MDY-H-2003 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Saidu Sharif, Swat held in _____ as a Regular/Private candidate. He/She obtained 609

Marks out of 1100 and has been placed in Grade C Representing GOOD

Internal Grade

The Examination was taken as a whole/in parts.

Muhammad
Asstt. Secretary

This certificate is issued without alteration or erasure.

Muhammad
Secretary

Ahmed

Md
LECTURER
Govt. AKL P.G College
Matta Swat.



UNIVERSITY OF MALAKAND

PAKISTAN

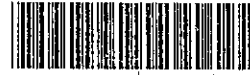
DETAILED MARKS CERTIFICATE

S.No A 017974

Name: UMAR FAROOQ

Private Candidate District Swat

Father's Name: NOWSHERAWAN



Registration No. 2005710205

Roll No. 5354

B.A PART-II ANNUAL EXAMINATION 2010

| Subject Name | Total Marks | Marks Obtained | Remarks |
|--|-------------|----------------|---------|
| ISLAMIC STUDIES(E) | 75 | 56 | PASSED |
| ENGLISH(C) | 75 | 24 | PASSED |
| ARABIC | 75 | 64 | PASSED |
| PAK. STUDY | 40 | 17 | PASSED |
| BA PART-I MARKS | 285 | 174 | PASSED |
| Subject Passing Percentage: 33 (Theory & Practical Separately), Aggregate Percentage: 56 | | 550 | 335 |

Examination Held From Jun 22—Jul 20, 2010

Result Declared on 31-Aug-2010



Errors and Omissions are subject to subsequent rectification

Examination was taken as a whole/in parts

Date of Issue: 02-Sep-2010

Prepared by: MUJEEB UR RAHMAN

A. H. Steel

[Signature]
LECTURER
Govt. AKL P.G College
Matla Swat.

[Signature]
Controller of Examinations
University of Malakand

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Serial No. 216288

PROVISIONAL RESULT CARD

Name **UMAR FAROOQ**
 Father's Name **NOWSHER WAN**
 Address **VILL. BASHI GRAM P/O MADYAN**
BEHRAIN
 Tehsil **BEHRAIN**
 District **SWAT**

Roll No. **AC617320**
 Registration No. **09NST00124**
 Final Semester **AUT- 2009**

has successfully completed **PRIMARY TEACHING CERTIFICATE**

The detail of passed courses are as under:

| Semester | Course Code | Title of Course | Marks | |
|----------|-------------|--|---------|----------|
| | | | Maximum | Obtained |
| SPR- 09 | 0615 | SCHOOL ORGANIZATION & MANAGEMENT | 100 | 68 |
| SPR- 09 | 0614 | EDUCATIONAL PSYCHOLOGY | 100 | 70 |
| SPR- 09 | 0613 | PRINCIPLES OF EDUCATION | 100 | 64 |
| SPR- 09 | 0616 | SCHOOL COMMUNITY & PRACTICAL ARTS | 100 | 73 |
| AUT- 09 | 0619 | TEACHING OF SCIENCE & PHYSICAL EDUCATION | 100 | 73 |
| AUT- 09 | 0618 | TEACHING OF MATHEMATICS | 100 | 60 |
| AUT- 09 | 0617 | TEACHING OF URDU | 100 | 71 |
| AUT- 09 | 0611 | PRACTICAL WORKSHOP & TEACHING PRACTICE | 100 | 85 |
| AUT- 09 | 0620 | TEACHING OF ISLAMIAT & SOCIAL STUDIES | 100 | 68 |

Attested

[Signature]
LECTURER
 Govt. AKL P.G College
 Matta Swat.

CREDITS: 5

Total Marks / Obtained 900 / 632

Result Declared on **SEPTEMBER 17, 2010**

Percentage / Grade **70 A**

Date of issue **SEPTEMBER 29, 2010**

[Signature]

Disclaimer:

Controller of Examinations

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

SWAT EDUCATION COMPLEX

Madyan Swat. Tel:0946-643271

Ref. No: 12

EXPERIENCE CERTIFICATE

This is to certify that **Mr. Umar Farooq** Son of **Mr. Nawsherawan**

Resident of Bashigram, Swat has been teaching in this school from 1st January 2008 to till
25/11/11
date. He has been working as an efficient and sincere teacher. He is very efficient, honest, punctual and regular.

He knows his job very well. All the students and teachers are very please with him.

We pray for his long life, prosperity and bright future. May Allah bless him with good and pleasant mood.

Attested

[Signature]
LECTURER
Govt. AKL P.G College
Matta - Swat

[Signature]
Principal
Swat Education Complex
Madyan Swat

[Signature]
PRINCIPAL,
Swat Education Complex
Satta, Distt: Swat

Principal
Swat Education Complex
Madyan Swat.

COMPLETION OF VERIFICATION

Certified that the SSC,FA,FSc,BA,BSc,MA,MSc and PTC certificates/Degree are received duly verified from the concerned board /University and kept on the record of this office in respect of Mr Umar Farooq S/o Nawsher Khan PST Govt, Primary School. Shalkijan

Therefore his monthly salary may please be drawn with effect from the date of his taking over charge in present school.

M. Amin
22/10/11
(SUPERINTENDENT)
Deputy District Officer(M)
Elem&Secy, Education Swat.

Attested

[Signature]
LECTURER
Govt. AKL P.G College
Matta Swat.

[Handwritten mark]

(8)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION SWAT
Phone No. 0946-9240228-209

ORDER

In pursuance of the meeting of the District Selection Committee held on 28.05.2011, the Executive District Officer Elementary & Secondary Education Swat being competent authority is pleased to order the appointment of the following candidates against PST vacant posts at the School noted against their names in BPS:09 Rs. 3820-230-10730/ plus usual allowances as admissible under the rules except section 19 of Khyber Pukhtun Khwa Rule 1973 with effect from the date of their taking over charge subject to the following terms and conditions given below:

PST MALE UNION COUNCIL WISE

| | | | | | | |
|----|---|--------------|------------|-------|-----------------|----------------------|
| 1 | Syed Bahar Alam Shah S/o Syed Fazal Karim | Banjot | 17.01.1988 | 63.21 | U/C A.M.Bekhel | GPS Achar No 1 |
| 2 | Muhammad Farooq S/o Said Muhammad | Sar Sardaray | 01.03.1984 | 61.81 | U/C A.M.Bekhel | GPS Uzbaka |
| 3 | Nasar Hussain S/o Fazal Rahim | Biakand | 01.03.1989 | 62.73 | U/C Arkot | GPS Shpilai |
| 4 | Hazrat Ali S/o Mamber | Sharo | 25.03.1986 | 62.27 | U/C Arkot | GPS Ochrai |
| 5 | Murad Ali S/o Moamber Khan | Kala Kot | 10.04.1985 | 62.25 | U/C Asharay | GPS Piradui |
| 6 | Naved Ahmad S/o Nisar Ahmad | Bahrain | 12.04.1989 | 56.84 | U/C Bahrain | GPS Kulbanr |
| 7 | Mujeebur Rahman S/o Mirajud Din | Bahrain | 12.08.1986 | 56.59 | U/C Bahrain | GPS Kuz Alar |
| 8 | Muhammad Ismail S/o Shah Masin Khan | Baidara | 06.01.1987 | 60.52 | U/C Baidara | GPS Gharib Abad |
| 9 | Imran Khan S/o Bakht Baidar Khan | Baidara | 10.11.1983 | 59.18 | U/C Baidara | GPS Bijawra |
| 10 | Akhtar Hameed S/o Akhtar Munir | Kidam | 01.09.1988 | 61.47 | U/C Balakot | GPS Kufi Ramait |
| 11 | Imtiaz Ahmad S/o Fazal Wadood | Bara Bandai | 18.05.1988 | 60.29 | U/C Bara Bandai | GPS Malooka |
| 12 | Fazal Hayat S/o Bacha Zada Khan | Tangar | 02.03.1987 | 61.17 | U/C Barthana | GPS Gamsir No.1 |
| 13 | Taj Muhammad Khan S/o Fahim Gul | Bashigram | 01.03.1990 | 63.20 | U/C Bashigram | GPS Shinkoo |
| 14 | Umar Farooq S/o Nawsherawan | Beshigram | 14.01.1989 | 62.80 | U/C Bashigram | GPS Shalkyar |
| 15 | Muhammad Sadiq S/o Wahid Zaman | Biha | 03.04.1989 | 62.60 | U/C Biha | GPS Qilu Fazil Banda |
| 16 | Muhammad Anjum S/o Muhammad Zehid | Labat | 20.12.1988 | 61.83 | U/C Biha | GPS Barabro |
| 17 | Samiullah S/o Tajim Khan | Chuprial | 01.12.1989 | 61.93 | U/C Chuprial | GPS Gajarbanr |
| 18 | Noor Ali S/o Hadi Khan | Kamalay | 20.01.1986 | 60.48 | U/C Chuprial | GPS Kamalay |

| | | | | | | |
|----|--------------------------------------|---------------|------------|-------|---------------------|---------------------|
| 19 | Nisar Ahmad S/o Fazal Rahman | Sangota | 06.01.1981 | 58.45 | U/C Dangram | GPS Sabonay |
| 20 | Shah Faisal S/o Noor ul Hadi | Rahat kot | 02.09.1985 | 60.42 | U/C Darmai | GPS Hakimabad |
| 21 | Sayed Jamal Shah S/o Mian Rahim Jan | Ragistoon | 01.01.1989 | 60.28 | U/C Darmai | GPS Ragistoon |
| 22 | Abdul Kabir S/o Abdul Rauf | Azad Banda | 01.05.1986 | 60.15 | U/C Darmai | GPS Kot Darmai |
| 23 | Amjad Ali S/o Fazal Wadood | B.D.Khela | 12.01.1983 | 63.26 | U/C B.D.Khela | GPS Mandan |
| 24 | Kor Wadan S/o Musafar | K.D.Khela | 04.04.1981 | 62.84 | U/C B.D.Khela | GPS Bazkhela No.1 |
| 25 | Fazal Amin S/o Muhammad Aleem | D.khela | 07.03.1987 | 61.06 | U/C B.D.Khela | GPS Bazkhela No.2 |
| 26 | Nisar Ahmad S/o Khaista Muhammad | Fatehpur | 07.12.1982 | 61.53 | U/C Fatehpur | GPS Baban |
| 27 | Allaud Din S/o Akhtar Munir | Fatehpur | 01.01.1989 | 60.81 | U/C Fatehpur | GPS Baban |
| 28 | Anwar Ali S/o Muhammad Rashad | Gulibagh | 15.03.1982 | 62.68 | U/C Gulibagh | GMPS Bagla |
| 29 | Shafiullah S/o Pashmin | Dagny | 04.04.1987 | 60.30 | U/C Gwalerni | GPS Awaai Gat |
| 30 | Hameedur Rahman S/o Amir Hatam | Roringur | 03.03.1986 | 59.94 | U/C Gwalerni | GPS Muradai |
| 31 | Habib Shah S/o Muhammad Ishaq | Hazara | 11.01.1981 | 60.81 | U/C Hazara | GPS Shaikhoo |
| 32 | Noor Zada S/o Muhammad Faqir | Ashoran | 13.02.1987 | 62.83 | U/C Kalam | GPS Batandar kalara |
| 33 | Fazal Rahim S/o Janas Khan | Ushoo | 20.01.1982 | 62.43 | U/C Kalam | GPS Matiltan |
| 34 | Muhamamd Jamil S/o Bakht Zada | Kanju | 06.06.1986 | 62.91 | U/C Kanju | GMPS Gulonshah |
| 35 | Sajad Ali S/o Mian Raham Dil | Khwaza Khela | 06.03.1987 | 61.06 | U/C Khwaza Khela | GPS BandaiMaira |
| 36 | Masoodur Rahman S/o Ali Rahman | Tikdarai | 15.03.1983 | 60.93 | U/C Khwaza Khela | GPS Bandai |
| 37 | Mian Said Bacha S/o Mian Said Bashar | Serai | 16.04.1988 | 58.16 | U/C Kishawra | GPS Sordairni |
| 38 | Ahmad Hussain S/o Sahib Zado | Kokrai | 08.01.1987 | 59.37 | U/C Kokrai | GPS Bar Baligram |
| 39 | Muhammad Ilyas S/o Sultanat Khan | Kokrai | 30.01.1988 | 57.30 | U/C Kokrai | GPS Kuz Gishar |
| 40 | Mumtaz Ali Khan S/o Abdul Ahad | k. Bandai | 01.08.1989 | 62.27 | U/C Kozn Bandai | GPS Lalo Banda |
| 41 | Noorul Amin S/o Noorul Ahad | Madyan | 11.01.1986 | 61.04 | U/C Madyan | GPS Bar Bangish |
| 42 | Fazal Ghafar S/o Shah Furhad | Madyan | 05.05.1987 | 57.80 | U/C Madyan | GPS Kunda |
| 43 | Mahboob Sani S/o Husan Sani | Malokk Abad | 25.05.1985 | 59.36 | U/C Malook Abad | GMPS Noorullah |
| 44 | Usman Ali S/o Sumandar | Darolai | 13.12.1986 | 62.14 | U/C Mankeyal | GPS Zarinal |
| 45 | Ali Akbar S/o Muhammad Toti | Ditpanai | 31.03.1981 | 62.26 | U/C Matta Kahrerni | GPS Churlaka |
| 46 | Haraidullah S/o Ghulam Habib | Totakay | 24.10.1990 | 61.45 | U/C Matta Kahrerni | GPS Ditpanai |
| 47 | Muhammad Alamgir S/o Hazrat Umar | Sinpora | 30-3-1977 | 59.96 | U/C Matta Kahrerni | GPS Mandoor |
| 48 | Aurang Zeb S/o Fazal Khaliq | Nwankalay (M) | 07.04.1984 | 61.99 | U/C N. K. Shah Dara | GPS Sirajabad |
| 49 | Barkat Ali S/o Shah Kamin Khan | Pir Kalay | 26.07.1981 | 60.10 | U/C Pir Kalay | GMPS Qaziabad |

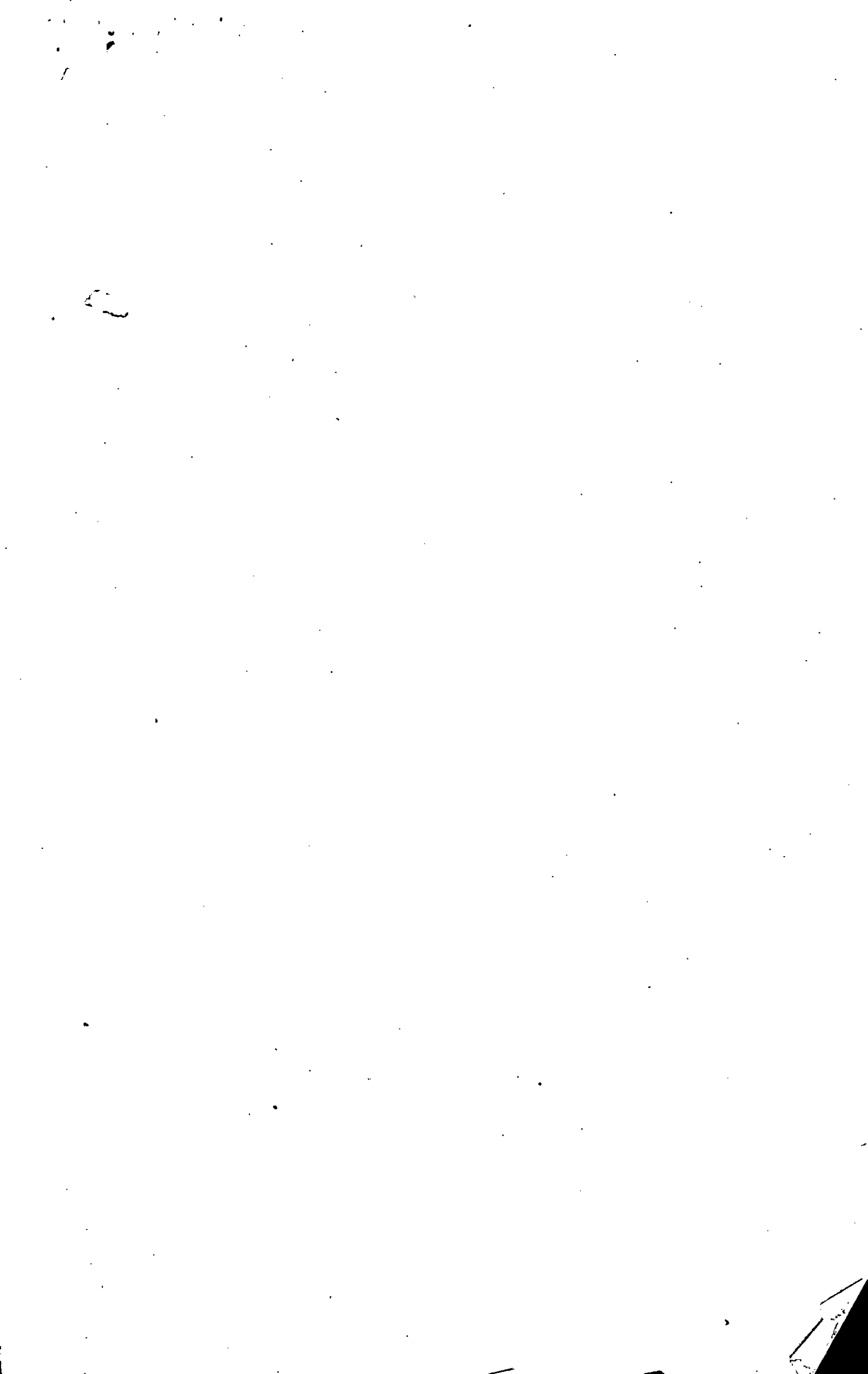
| | | | | | | |
|----|---------------------------------------|---------------|------------|-------|-------------------|---------------------|
| 50 | Anwarul Haq S/o Shah Kamin | Sakhra | 28.12.1969 | 62.62 | U/C Sakhra | GPS Shaktian |
| 51 | Sikandar Hayat S/o Muhammad Amin Khan | Sakhra | 03.02.1983 | 61.98 | U/C Sakhra | GPS Garah Lalkoo |
| 52 | Muhammad Zuhir S/o Gul Zaman | Shah Dherai | 02.12.1983 | 60.81 | U/C Shah Dherai | GPS Serai Shahderai |
| 53 | Jamalud Din S/o Muhammad Ali Khan | Shah dherai | 06.05.1980 | 60.59 | U/C Shah Dherai | GPS Sekai Shahderai |
| 54 | Ali Akbar S/o Shamshi Bahadar | Zara Khela | 20.04.1981 | 69.07 | U/C Shamozi | GPS Jabugai |
| 55 | Muhammad Zakarya s/o tota Khan | Bar Shawar | 10.02.1985 | 61.86 | U/C Shawar | GPS Recma |
| 56 | Muhammad Khaliq S/o Sher Zada | Kuz Shawar | 20.04.1981 | 61.78 | U/C Shawar | GPS Kandawgai |
| 57 | Jemshid S/o Talizar | Nawakaly Shin | 15.04.1978 | 57.39 | U/C Shin | GPS Bargin |
| 58 | Niamatullah S/o Ihsanullah | Deolai | 02.08.1989 | 62.49 | U/C Deolai | GPS Shnge Bawrai |
| 59 | Anwar Ali S/o Shah Wazir Khan | Mansi | 03.05.1990 | 61.75 | U/C Tall | GPS Mainzkhpn |
| 60 | Bacha Nawab S/o Muhammad Qayum | Mansi | 26.06.1991 | 61.60 | U/C Tall | GPS Belokhwar |
| 61 | Israr Ahmad S/o Nisar Ahmad | Totano Bandai | 01.03.1989 | 56.72 | U/C Totano Bandai | GPS Shagai Sarbala |

PST MALE OPEN MERIT

| S.No. | Name with parentage | Address | D/O birth | Marks | Place of posting |
|---------|--|----------------|------------|-------|--------------------------|
| 1/917 | Iqbal Hussain S/o Abdur Rauf | Kota | 07.03.1985 | 71.78 | GPS Telang |
| 2/362 | Rafiullah s/o Rehanullah | Barama Mingora | 04.03.1985 | 70.05 | GMPS Sherabad |
| 3/645 | Barkat Ali Khan S/o Bakht Amin Khan | Hazara | 01.07.1984 | 69.92 | GPS Tootbana |
| 4/291 | Muhammad Saleem Khan S/o Qavi Khan | Kandari | 10.01.1991 | 69.52 | GPS Langar |
| 5/1244 | Muhammad Raziq S/o Mian Salar | Kuz Shawar | 10.09.1984 | 69.45 | GPS Dughlai |
| 6/432 | Yousaf ali Shah S/o Muhammad Rahim Sahib | B.D.khela | 15.06.1981 | 69.25 | GPS Spinakhpn |
| 7/650 | Shawkat Ali S/o Taj Muhammad Khan | Nawakalay (M) | 10.03.1985 | 68.52 | GPS Rahimabad-2 |
| 8/430 | Muhammad Ahad S/o Muhammad Ambali Khan | Dakorak | 12.03.1985 | 68.31 | GMPS Egalpur |
| 9/1703 | Nisar Ali S/o Sardar Ali | Khawaz Khela | 04.07.1986 | 68.24 | GPS Tikdarhi |
| 10/2032 | Farmanullah S/o Samiul Haq | Janoo | 18.03.1986 | 68.16 | GPS Bahomairn |
| 11/1121 | Hamidullah S/o Ayub Khan | Qambar | 03.05.1983 | 68.11 | GMPS Kulpkarin |
| 12/902 | Attaullah S/o Habibun Nabi | Udigram | 01.06.1978 | 67.95 | GMPS Nimogran |
| 13/889 | Rahmat Ali S/o Tasir Jan | Ningolai | 01.01.1987 | 67.86 | GPS Narainpura |
| 14/1145 | Amjad Ali S/o Akbar Shah | Qambar | 18.04.1982 | 67.67 | GPS Sabonny |
| 15/1393 | Suhant Ram Chawla S/o Hans Raj Chawla | Shah Dara | 30.01.1985 | 67.43 | GMPS Miangana Chum |
| 16/421 | Shafiq Ahmad S/o Shakeel Ahmad | Udigram | 17.04.1983 | 67.42 | GPS Faizabad No.2 |
| 17/16 | Muhammad Tariq S/o Fazal Wadood | B.D. Khela | 10.04.1977 | 67.34 | GPS Bara Duraskhela Chum |

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| | | | | | |
|---------|--------------------------------------|----------------|------------|-------|----------------------|
| 18/175 | Njaeebullah S/o Ihsanullah | Banar | 01.04.1987 | 67.19 | GPS Saidarabala |
| 19/467 | Shakirullah S/o Muhammad Jan | Dandanai | 03.01.1989 | 67.11 | GPS Dandanai |
| 20/1616 | Izat sher S/o Muhammad | Khwaza Khela | 02.02.1985 | 67.03 | GPS Birarai |
| 21/425 | Sultan Ali S/o Habibur Rahim | Udigram | 10.01.1984 | 66.91 | GPS Dalegram |
| 22/476 | Farid Ahmad S/o Chanary | Madyan | 01.04.1985 | 66.89 | GPS Lalshish Balakot |
| 23/341 | Javid Ashraf S/o Shah Rawan | Shalpin | 01.06.1987 | 66.86 | GPS Sheray |
| 24/754 | Noour Ullah S/o Muhammad Zeb | Kalakot | 10.02.1987 | 66.75 | GPS Pirabad |
| 25/40 | Noor Ul Wahab S/o Shamsul Wahab | Totano Bnadai | 22.06.1988 | 66.67 | GMPS Danda |
| 26/29 | Aurang Zeb S/o Shahinshah | Kabal | 03.03.1980 | 66.66 | GMPS Lanchar |
| 27/305 | Rahman Hadi S/o Fazal Rahim | Hazara | 08.06.1989 | 66.57 | GPS Qambou |
| 28/649 | Shahid Khan S/o Muhammad Shah Khan | Lindodag | 03.03.1986 | 66.43 | GPS Gopdara |
| 29/1400 | Sacddullah Khan S/o Ashnagharay | Jehan Abad | 15.01.1986 | 66.38 | GMPS Mamz Gai |
| 30/08 | Syed Jehan Shah S/o Muhammad Kamal | Mashkomai | 01.04.1977 | 66.30 | GPS Topsin |
| 31/981 | Fazal Sher S/o Sherin Zada | Nawakalay | 04.02.1987 | 66.16 | GPS Sangrai |
| 32/420 | Mushtaq Ahmad S/o Shakeel Ahmad | Udigram | 01.09.1985 | 66.11 | GPS Samsaray |
| 33/1570 | Muhamamd Shafiq S/o Karwanay | Deolai | 03.04.1979 | 66.08 | GPS Bala Deolai |
| 34/1266 | Attaullah Shah S/o Inyatullah | Kauju | 01.04.1976 | 66.06 | GPS Dampahu No.2 |
| 35/431 | Habib Ali Khan S/o Shamsher Khan | Chalyar | 01.03.1984 | 65.99 | GPS Maupita |
| 36/969 | Arshad Iqbal S/o Ruhul Amin | Chail Shagai | 02.04.1978 | 65.93 | GPS Kadota |
| 37/269 | Anjad Ali S/o Khurshid Khan | Chupriyal | 13.03.1984 | 65.78 | GPS Chungu |
| 38/803 | Fida Ullah Khan S/o Ahmad Jehan Khan | Seer | 11.02.1986 | 65.68 | GPS Khwarpatan |
| 39/790 | Noorul Ahad Mian S/o Mian Muhammad | Serai | 05.03.1986 | 65.68 | GPS Bar Jabur |
| 40/1035 | Muhamamd Asad Sardar s/o Sardar Ali | Paur | 02.08.1983 | 65.59 | GPS Sabony |
| 41/1365 | Bakht Naeem Khan S/o Bakht Mandyar | Morpandai | 01.01.1978 | 65.55 | GPS Pardi Shah |
| 42/1867 | Arsahd Ali S/o Sultani Rom | Chantaali | 25.04.1986 | 65.53 | GPS Urdan |
| 43/17 | Abbas Ali S/o Fazal Wadood | B.D.Khela | 09.02.1989 | 65.50 | GPS Para Durashkhela |
| 44/766 | Bahadar Khan S/o Tota khan | Bar Shawar | 20.02.1987 | 65.36 | GPS Omar (Wama) |
| 45/176 | Irfanullah S/o Ihsanullah | Banar | 04.06.1985 | 65.31 | GMPS Amir Khan |
| 46/1777 | Nisar Ahmad S/o Khalid Khan | Toatano Bandai | 15.02.1976 | 65.23 | GPS Soray Shauray |
| 47/1302 | Ikramul Haq S/o Hussnul Maab | Shin | 01.11.1989 | 65.21 | GPS Sangrai |
| 48/426 | Liaqat Ali S/o Muhamamd Jan | Sharif Abad | 05.01.1979 | 65.18 | GPS Patana |
| 49/888 | Rahmat Ali S/o Muhammad Ibrahim | Ningolai | 10.01.1988 | 65.10 | GPS Pirkala |



| | | | | | |
|---------|-------------------------------------|------------------|------------|-------|-------------------|
| 50/1600 | Muhamad Ibrahim S/o Shah Zarin | Shah Dherai | 02.05.1978 | 65.09 | GPS Khwazata |
| 51/118 | Muhamamd Arif S/o Muhamamd Qauraish | Madyan | 08.04.1980 | 65.04 | GPS Patta |
| 52/51 | Ijaz Ali Khan S/O Muhammad Aqil | Nawakalay (shin) | 05.03.1985 | 65.03 | GPS Bar Banga |
| 53/285 | Ibrar Ali S/o Sha Wazir Kahn | Mashkomai | 17.03.1986 | 64.95 | GPS Gidar Sar |
| 54/84 | Shafiq Ahmad S/o Umar Khitab | Qandil | 20.01.1988 | 64.92 | GPS Osar |
| 55/739 | Aleem Khan S/o Fazal Rahman | Kotlai | 04.01.1990 | 64.75 | GPS Kasar |
| 56/839 | Javid Iqbal s/o Muhamamd Khan | Galoch | 01.06.1987 | 64.74 | Maraga |
| 57/119 | Afzal shah S/o Mian Badshah | Chuprial | 04.04.1983 | 64.72 | GPS Namakar |
| 58/ | Attaullah S/o Abdur Rauf | Azada | 22.05.1988 | 64.65 | GPS Awisha |
| 59/1954 | Nooran Shah S/o Umar Pervez | Banda | 10.03.1990 | 64.62 | GPS Kharka |
| 60/41 | Ali Rahman S/o Azizur Rahman | Alamganj | 30.12.1984 | 64.62 | GPS Rofia |
| 61/200 | Zafar Iqbal S/o Muhammad | Kuza Bandai | 25.08.1986 | 64.49 | GPS Laran |
| 62/24 | Sanaullah S/o Muhammad Qasim | Aligrama | 05.12.1991 | 64.48 | GPS Dendani |
| 63/143 | Abdullah Shah S/o Nowsherawan | Deolai | 04.10.1983 | 64.44 | GPS Tangarshah |
| 64/1290 | Roshan Ali S/o Sher Afzal | Seigram | 05.03.1987 | 64.37 | GPS Jabang |
| 65/121 | Rahmat Zada S/o Fagir Gul | Shinkad | 05.01.1989 | 64.36 | GPS Qwani |
| 66/1180 | Imtiaz Ahmad S/o Fasih Ahmad | Kuza Bandai | 15.06.1981 | 64.28 | GPS Bakaray |
| 67/130 | Fazal Wahid S/o Abdul Qayum | Aligrama | 20.06.1986 | 64.22 | GPS Tarkaru |
| 68/994 | Ajmal Khan S/o Fajbar Khan | Galoch | 10.03.1991 | 64.17 | GPS Sardar |
| 69/1526 | Kifayatullah S/o Azizur Rahman | Pashonai | 01.03.1980 | 64.11 | GPS Tarogay |
| 70/859 | Muhamamd Zeb S/o Muhamamd Amin | Janoo | 01.03.1987 | 64.03 | GPS Kuz Kad |
| 71 | Ishfaq Ahmad S/o Qubad Khan | Kuz Shawar | 10.03.1983 | 64.02 | GPS Baboeran |
| 72/1042 | Mulhar Ali S/o Rozi Ahmad Khan | Qambar | 02.02.1986 | 63.91 | GPS Mashkomai |
| 73/307 | Hukbar S/o Sher Akbar Khan | Mashkomai | 15.03.1990 | 63.90 | Maua |
| 74/314 | Karimullah S/o Muhamad Ishaq | Barkalay | 10.01.1985 | 63.89 | GPS Kotanai |
| 75/ | Faiz Ali Shah S/o Ahmad Jan | Mahak | 10.01.1989 | 63.78 | GPS Mohd Bani |
| 76/662 | M. Latifullah S/o Abdul Latif | Madyan | 09.03.1986 | 63.75 | GPS Katad |
| 77/381 | Muhammad Salam S/o Muhammad Anwar | Malook | 03.10.1985 | 63.71 | GPS Bahmadai |
| 78/1693 | Mehmood Fazal S/o Fazal Hamid | Abad | 01.04.1988 | 63.67 | Banda |
| 79/941 | Sajjad Ali Khan S/o Didar Ali Khan | Bila | 22.04.1986 | 63.60 | GPS Chancharay |
| 80/305 | Rahman Hadi S/o Fazal Rahim | Fatehpur | 08.06.1989 | 63.57 | GPS Zarat |
| 81/4292 | Irfan Saleem S/o Muhamamd Suliman | Khwaza | 10.03.1988 | 63.55 | GPS Toobanai |
| 82/1382 | Umar Sharif S/o Umar Razaq | Khela | 01.03.1987 | 63.53 | GPS Narangpura |
| 83/79 | Sheraz S/o Muhamamd Rom | Hazra | 04.03.1989 | 63.52 | GPS Munapand |
| 84/573 | Shahab Zada S/o Muhamamd Zada | Kuza Bandai | 01.03.1981 | 63.49 | GPS Seran Kishwar |
| 85/241 | Nacemullah S/o Umara Khan | Islampur | 02.01.1991 | 63.47 | GPS Kalwara |
| 86/141 | Nisar Ali S/o Salih Gul | Charbagh | 01.12.1982 | 63.45 | GPS Riba dae |
| | | Fatehpur | | | GPS Khanabad |

| | | | | | |
|----|------------------------------------|---------|------------|-------|---------------|
| 87 | Shafiullah S/o Abdullah | Nasrat | 07.06.1979 | 63.37 | GMPS Shahbika |
| 88 | Salim Akhtar S/o Khuna Gul | Kabal | 07.04.1982 | 63.35 | GMPS Shinkay |
| 89 | Shah Wazir Khan S/o Muhammad Wazir | Dakorak | 01.01.1989 | 63.31 | GPS Kandaw |

PST MALE DECEASED SONS

| | | | | | |
|---------|------------------------------------|----------------|------------|-------|-----------------------|
| 1/137 | Mian Rahim Shah S/o Main Sahib Jan | Gulibagh | 02.01.1984 | 60.88 | GMPS Barjabar |
| 2/2106 | Laiq Zada S/o Ahmad Gul | Biba | 03.03.1989 | 58.55 | GPS Fazal Banda |
| 3/1194 | Sajid Hussain S/O Muhammad Iqbal | Tangar Matta | 01.01.1989 | 58.31 | GPS Bahadar Banda |
| 4/1444 | Sajjad S/o Shah Bacha | Galoch | 23.04.1985 | 58.26 | GPS Taghna |
| 5/1537 | Naveed Ali S/o Dost Muhammad Khan | Balogram | 18.04.1984 | 55.64 | GPS Ghalbi Banda |
| 6/479 | Zeeshan Khaliq S/o Fazal Khaliq | Kokarai | 04.05.1990 | 51.45 | GPS Gorkla |
| 7/1692 | Attaur Rahman S/o Khalid Khan | Sapal Bandai | 02.01.1984 | 50.46 | GPS Jawaz |
| 8/206 | Nasim Hijaz S/o Bacha Zada | Tangar | 17.01.1988 | 49.44 | GMPS Shingrai Sijbani |
| 9/155 | Ihsanullah S/o Muhammad Dost | K.D.Khela | 20.07.1989 | 48.13 | GMPS Tokhtai |
| 10/1094 | Ihsanullah S/o Abdul Wahab | Aligram Shawar | 20.03.1990 | 45.14 | GPS Aligram |
| 11/105 | Rahman Hadi S/o Muhammad Khan | Ashoran | 05.07.1979 | 45.11 | GPS Anar |
| 12/1409 | Zafarullah S/o Faiz Muhammad | Miandam | 20.03.1985 | 44.07 | GPS Kalwara |

PST MALE DISABLED

| | | | | | |
|--------|-------------------------------|----------|------------|-------|-----------------|
| 1/282 | Zahid Khan S/o Bostan Khan | Mashkoma | 12.04.1989 | 63.91 | GMPS Dadangalai |
| 2/701 | Hussain Karim S/o Fazal Karim | Kalakaly | 02.03.1985 | 62.35 | GPS Mohid Raiz |
| 3/1890 | Subhan Ali S/o Ali Akbar Mian | Tikdarai | 1.04.1986 | 59.81 | GPS Saida |

TERMS & CONDITIONS:

1. The amended section 19 will be applicable in case of those civil servants who were appointed to a pension able post on regular basis before 1st day of July 2001, having regular service without any break and have applied through their Department shall be given an option either to retain the benefits of pension and gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under his new appointment.
2. All the Degrees /certificates will be verified from the concerned Board/ University by DDO (Male) on the expenses of the candidate concerned within one month after taking over charge.
3. The new appointee should submit challan/ Bank drafts in the name of controller of Examination of the concerned Board/ University along with photocopies of the testimonials to the DDO (Male) for verification within Fifteen days after taking over charge.
4. In case any certificate / degree found incorrect/ fake/ unverified the appointment of the candidate concerned shall be cancelled automatically.
5. The Original certificate/ Degree and health & age certificate of the candidate should be checked before handing over charge to him by the Head of the concerned school.
6. They will not be handed over charge if their age is less than 18 years or more than 35 years. Charge Reports should be submitted to all concerned.
7. They will be governed under terms and conditions as prescribed by the government from time to time.
8. Their services can be terminated in any time in case their performance is found unsatisfactory and they

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- will be proceeded under special power ordinance 2000.
- 10. They should join the post within one month of the issuance of this order other wise their appointment will be cancelled automatically.
- 11. In case of resignation they will have to give one month prior notice to the Department or forfeit one month salary in lieu thereof to the government
- 12. The new appointees will not apply for transfer at least for two years
- 13. The senior employees can appeal for transfer against the place of new appointees within a month time. Positively, later on any appeal will not be considered.
- 14. No TA/DA is allowed

CSJF TAN AB THMOOD MEANG
 EXECUTIVE DISTRICT OFFICER
 ELEMENTARY & SECONDARY
 EDUCATION SWAT

dated 30-6-2011

Endst No. 10046-53 /Appointment/2011

Copy to:-

- 1. The Director Elementary and Secondary Education Khyber Pakhtun Khwa Peshawar
- 2. The District Coordination Officer Swat.
- 3. The District Accounts Officer Swat.
- 4. The DDO (Male) Primary Swat.
- 5. The ADO Male concerned.
- 6. The Superintendent Primary local office.
- 7. The candidate concerned.
- 8. PA to EDO local Office.



EXECUTIVE DISTRICT OFFICER
 ELEMENTARY & SECONDARY
 EDUCATION SWAT

Before the Member Khyber Pakhtunkhwa
Service Tribunal, Peshawar

Appeal No. 239 / 2013

Umar Farooq

Appellant

v/s

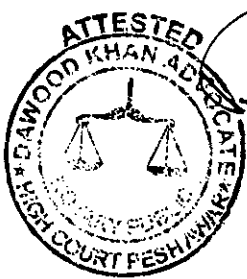
1. DCO Swat

2. EDO Education Swat.

R/sir

It is submitted that your
govt office has issued a notice on the
name of Distt. Coordination officer Swat
But the post of D.C.O has been
abolished by the Provincial Govt. on
31-12-2012, (and now Deputy Commissioner)

It is, therefore, requested that
the name/designation of DCO may please
be excluded from the list of Respondent



13-07-15

14/7/2015

Representative of D.C. Swat
Ahmad Sher
PS to D-C Swat

BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 239/2013

UMAR FAROOQ EX-PST GPS SHAKYAR BASHIGRAM, DISTRICT SWAT.

APPELLANT

VERSUS

DISTRICT EDUCATION OFFICER (M) DISTRICT SWAT & OTHERS

RESPONDENTS

JOINT PARA WISE COMMENTS ON BEHALF OF RESPONDENTS
RESPECT FULLY SHEWETH

PRELIMINARY OBJECTIONS

- 1- The appellant has no locus standi /no cause of actions to file the instant appeal against the respondents.
- 2- The appellant has not come to this Honorable Tribunal with clean hands.
- 3- The appellant has concealed the material facts from this Honorable Tribunal hence liable to be dismissed.
- 4- The present appeal is liable to be dismissed for non joineder/miss joineder of necessary parties.
- 5- The instant appeal is against the prevailing law, rules, and policies.
- 6- The appellant is estoped by his own conduct to file the instant appeal.
- 7- The instant appeal is not maintainable in the present form.
- 10. That the instant appeal is time-barred.
- 11. That the appellant case has already been decided by the Peshawar High Court bench at Mingora (Darul Qaza) Swat in the writ petition No 130-M of 2012 filed by the Mr. Rahmat Gul. Therefore the instant appeal is not maintainable before the service tribunal.

Copies of writ petition by Mr. Rahmat Gul, Para wise comments submitted by respondents, Judgment of High Court and appointment order of Rahmat Gul are attached as Annexure A, B, C & D.

FACTUAL OBJECTIONS

1- That the appellant was appointed as PST on 30-06-2011 on the basis of Union Council Bashigram QUOTA/Merit list & was placed at serial No 2 in the merit list of UC Bashigram due to his fakes Marks (611) in SSC by scoring of 62:80. The SSC Certificate of the appellant Roll No 210909 Marks 611-A Year 2003 as submitted by the appellant in his application form for the PST was sent to BISE, SWAT for Verification. The BISE SWAT declared the 611 Marks in SSC Certificate of the appellant fake & Bogus vide letter No 3780-82/Cert/BISE-SWAT Dated 30-07-2012.

The actual Marks of the appellant were 384/850 instead of 611 as admitted by the appellant himself in his service appeal Para-J of grounds. That the appellant was terminated due to his fake & Bogus marks in SSC Certificate as verified by the BISE SWAT.

That Mr.Rahmat Gul S/O Aziz Gul filed a writ petition No 130-M of 2012 before the Peshawar High Court bench at Mingora (Darul Qaza) SWAT against the appointment of the appellant. The appellant was nominated as Respondent No 3 in his writ petition.

The Honorable court announced judgment on 20-12-2013 & Ordered for the revision of merit list & appointment of Mr.Rahmat Gul as PST in U/C Bashigram Quota & Mr.Rahmat Gul was appointed as PST in the light of the said judgment.

The case has already been decided by the High Court bench at Mingora, therefore it is not maintainable in the form in the service tribunal.

Copies of writ petition by Rahmat Gul, Para wise comments submitted by respondents, Judgment of High Court & Appointment order of Rahmat Gul & application form of the appellant & appointment order are attached as Annexure A, B, C, D, E & F.

- 2- That the appellant was terminated due to his fake & Bogus marks (611) in SSC Certificate instead of 384/850 after verification from BISE SWAT, as clarified in Para-1.
- 3- That the 611 Marks in SSC Certificate were declared fake by BISE SWAT vide letter No 3780-82/Cert/BISE SWAT Dated 30-07-2012. Copies of termination order & verification from BISE SWAT are attached as annex G.
- 4- Not admitted. The Para is already clarified in Para No 1.
- 5- Not admitted. The Para is already clarified in Para No 1 & 3.
- 6- That the appellant was terminated from his date of appointment after verification of SSC Certificate from BISE SWAT.

The respondent has already issued letter Dated 11-09-2012 to the appellant for recovery of Rs.187165/- W.E.F. 01-07-2011 to 31-08-2012 drawn by the appellant in the head of salaries. But the appellant did not deposit the said amount in govt treasury until now & the recovery is still pending copy of recovery letter is attached as annexure H.

- 7- That the appellant was terminated from service after proper verification from BISE SWAT & show cause notices were issued to the appellant by SDEO Primary SWAT & DEO (M) Swat. Copies of show cause notices are attached as annexure K & L.
- 8- Not admitted. The appellant termination is legal & according to rules as already clarified in Para No 1.

GROUND

- A- That the Para is already clarified in Para No 1 of factual objections.
- B- That the Para is already clarified in Para No 7 of factual objections.
- C- That the Para is already clarified in Para No 7 of factual objections.
- D- That the Para is already clarified in Para No 1 & 7 of factual objections.
- E- Not admitted. The appellant was terminated from service after due process & complete verification as already clarified in Para No 1, 2 & 3.


- F- That the appellant committed misconduct by presenting bogus marks 611/850 in SSC certificate in his application form for the post of PST during appointment.
- G- Not admitted. The appellant was terminated after due process & complete verification as already clarified in Para No 1, 2, 3 & 7. Copies of show cause notices are attached as annexure K & L.
- H- Not admitted. The Para is already clarified in Para No 1.
- I- Not admitted. The appellant was terminated after due process & complete verification as already clarified in Para No 1, 2, 3 & 7.
- J- That the appellant has mentioned his fake 611 marks instead of his original 384 marks in his application form.
- K- Not admitted. The appellant was terminated after due process & complete verification as already clarified in Para No 1, 2, 3 & 7.
- L- Not admitted. The Para is already clarified in Para No 1.

In view of the above facts and circumstances, this Honorable Tribunal may very graciously be pleased to dismiss the present appeal with the recovery of Rs. 187165/- as claimed in Para No 6 in the light of annexure H in favor of Respondents.


DEPUTY COMMISSIONER

At Gulkada SWAT

Deputy Commissioner
Swat.


DISTRICT EDUCATION OFFICER (M)

DISTRICT SWAT

Annex-A

(1)
(5)

BEFORE THE PESHAWAR HIGH COURT,
BENCH AT MINGORA (DARUL QAZA) SWAT

Writ Petition No. 130 M of 2012

Rahmat Gul S/o Aziz Gul R/o Chail, Behrain, District Swat.

....Petitioner

VERSUS

- (1) The District Coordination Officer, Swat.
- (2) The Executive District Officer, Swat.
- (3) Umar Farooq S/o Nawsherwan R/o Bashigram, Tehsil Behrain (PTC Teacher GPS Shalkyar Bashigram, Tehsil Behrain)

...Respondents

Writ Petition under Article 199 of the Constitution of
Islamic Republic of Pakistan, 1973

Respectfully Sheweth:

1. That the Petitioner is bona fide resident of Union Council Bashigram, Tehsil Behrain, District Swat. He is P.T.C trained and also a graduate from Malakand University. (Copies of the documents are enclosed as annexure A).
2. That the Respondent No. 2 after fulfillment of all the codal formalities issued appointment order of PTC teachers vide Endst: No. 10046-53/App/2011 on 30/06/2011. (Copy of the order is enclosed as annexure B).

(2)

3. That the Petitioner, being eligible has also applied for the post of PST against the quota reserved for Union Council Bashigram, but despite his merit beside his right on the basis of his merit position, he was not appointed and instead appointed Respondent No. 3, whose merit position is infact lower than that of the Petitioner. The record revealing this fact could not be annexed as that is lying in the custody of the Respondent No. 2, who did not allow any copy therefrom to the Petitioner.
4. That the Respondent No. 3 has infact secured 54.77 marks, whereas he has been shown to have secured 62.80 marks, brining him ahead in the merit list illegally. This has been manipulated by the Respondent No. 2 in league with the Respondent No. 3.
5. That Respondent No. 3 has secured 384 marks out of 850 that is grade "D", whereas he has been shown to have secured 611 marks on the basis of which his merit position has been raised from 54.77 to 62.80. And similarly the record would reveal that he has also been wrongly given the experience marks as his experience is less than the period as claimed by the Respondent No. 3 and admitted by the Respondent No. 2.
6. That on one side the Respondent No. 3 is holding the post of PTC wrongly and on the other side he has deprived the Petitioner from his legitimate right of appointment. The Respondents have been approached time and again, but

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(3)

they are avoiding to take legal, the required and appropriate steps. Hence, this petition on the following grounds.

GROUNDS:-

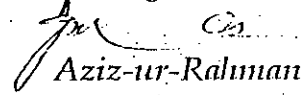
- a. That in the case of the appointment of the Respondent No. 3 and non-consideration of the Petitioner, the Respondent No. 2 has deviated from the due course of law. When he was informed of the facts above, he was required to have adhered to the due process of law, which is the fundamental right of every citizen.
- b. That this is a case relating to holding of a public office to which the access of every eligible candidate is his right, but in the manner elucidated above the Petitioner has not been allowed his access to the public office.
- c. That the Petitioner has been discriminated clearly, which blatant act of the Respondents is against the command of the constitution and is also against the Shariah.
- d. That the Respondents have kept and maintained the record in a very clandestine manner, which never gives any absolute information to the aggrieved persons including the Petitioner. This fact is also against the due course of law.

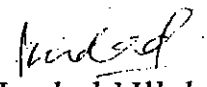
(4)

It is, therefore, very respectfully prayed that on acceptance of this Writ Petition, the Respondent No. 2 may kindly be directed to revise the merit list and if actually the Respondent No. 3 is holding the post of PTC wrongly, then his appointment order may kindly be declared as void ab-initio and in alternate the Petitioner on the basis of his merit position may kindly be ordered to be appointed against the said post.

Any other relief deemed appropriate in the circumstances may also kindly be granted.

Petitioner through counsels


Aziz-ur-Rahman
Advocate Swat
Cell No. 0300-9070671


Imdad Ullah
Advocate Swat
0333-9297746

Certificate:-

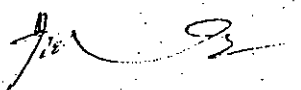
It is certified that no other such like Writ Petition is pending or decided by this Hon'ble Court.

Deponent

Rahmat Gul

List of Books:

1. Constitution of Islamic Republic of Pakistan, 1973
2. Civil Servant Act, 1974
3. Case law according to need.


Aziz-ur-Rahman
Advocate Swat

Annex-B

9

PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT.

FORM "A"

FORM OF ORDER SHEET

Court of
Case No.

| Serial No of order or proceeding | Date of Order or Proceeding | Order or other proceedings with Signature of judge or Magistrate and of parties or counsel where necessary |
|----------------------------------|-----------------------------|---|
| 1 | 2 | 3 |
| | 20.12.2013 | <p><u>W. P. No. 130-M/2012.</u></p> <p><u>Present:</u> Mr. Aziz-ur-Rahman, Advocate for petitioner.</p> <p>Muhammad Javed, AAG for the official respondents.</p> <p>***</p> <p><u>ASSADULLAH KHAN CHAMMKANI, J:-</u> Through instant writ petition, the petitioner seeks issuance of an appropriate writ directing the respondent No. 2 to make revise merit list because respondent No. 3 is holding the post of PTC (PST) wrongly. He further sought that the order of respondent No. 3 may kindly be declared 'void-ib-intio' and petitioner be appointed on the impugned post.</p> <p>2. Arguments of learned counsel for the parties heard and available record perused.</p> <p>3. Before touching other merits of the case, it is necessary to reproduce Para No. 4 of the comments filed by the respondent No. 2 which read as under:</p> <p>" That Para-4 as drafted is not correct because the entries have been made from the applications/testimonials of the candidates</p> |

ATTESTED

M

Notary Seal

Assadullah Khan

Mic
23/12



including the Respondent No. 3 (Application I is appended as Annexure-C) and the merit list is also been prepared as well which enable respondent No. 3 for scoring 62.80 marks placed at Serial No. 2 in the Union Cou Beshigram but is worth mentioning here that a verification and scrutiny, the documents of respondent No. 3 found fake and bogus and I been terminated from service vide order No. 814 48 dated 31.08.2012 (Copy appended as Annexu D) which shall be filed as and when the posts we advertised accordingly but the petitioner in th stage cannot be appointed. It is further commente that no illegality have been made by the responder No. 2 during the preparation of merit list.

4. From perusal of Para No. 4 of the comment filed by respondent No. 2 and order issued by responden No. 2 dated 31.08.2012. it is very much clear that the appointment order of respondent No. 3 is 'void-ib-intio'.

5. In this view of the matter. this writ petition is allowed and the respondent No. 2 is directed to appoint the petitioner on the any available vacant post.

JUDGE

JUDGE

4345
 Name of Applicant: Rahmat Gul
 Date of Application: 24-12-13
 Date of Completion: -
 No. of Copies: 3-P
 Fee: 6/-
 Date of Delivery of Cash: 24-12-13

28/12/2013

Certified to be a true copy

M. Nawab/Steno

[Handwritten Signature]

24/12/13

X

BEFORE THE PESHAWAR HIGH COURT, MINGORA BENCH

Writ Petition No. 130-M/2012

Annex-C

Rahmat Gul S/O Aziz Gul R/O Chail Bahrain Swat.....(Petitioner)

VERSUS

1. District Coordination Officer Swat at Gul Kadda.
2. Executive District Officer Elementary & Secondary Education Swat.
3. Umar Farooq S/O Nawsherawan R/O Bashigram, Tehsil Bahrain (PST GPS Shalkyar Tehsil Bahrain)

.....(Respondents)

PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 2

Respectfully Shewth.

The respondent submits as under.

PRELIMINARY OBJECTIONS

1. That the Petition is badly barred by time because appointment order has been issued on 30/6/2011 and the petitioner after a long slumber filed the instant petition in March 2012 and hence liable to be dismissed in the eye of law.
2. That the Petitioner has no cause of action / locus standi.
3. That the Petitioner has concealed the material facts from this Hon; Court, hence liable to be dismissed.
4. That the Petitioner has not come to this Hon; Court with clean hands.
5. That Petitioner has filed the instant petition just to pressurize the respondents.
6. That the present petition is liable to be dismissed for no-joinder and miss-joinder of necessary parties.
7. That Petitioner has filed the instant petition on malafide motives.
8. That instant petition is against the prevailing law and rules.
9. That Petitioner is estopped by his own conduct to file the instant writ petition.
10. That the instant writ petition is not maintainable in the present form and also in the present circumstances of the issue.
11. That this Hon; Court has no jurisdiction to adjudicate the present petition. The jurisdiction of this Hon; Court is specifically barred because of the provisions contained in Article 212 of the Constitution.
12. That according to law and Rules, department is authorized to lay down method of appointment, qualification and other conditions applicable to post.

FACTS

1. That Para-1 pertains to the petitioner Educational & Academic qualification record as well as residential record hence needs no comments.
2. That Para-2 is correct and admitted by the petitioner his petition and needs no further comments.
3. That Para-3 as drafted is not correct. Petitioner was at S.No.3 having score 61.47 in Union Council Beshigram while respondent No.3, namely, Umar Farooq having score 62.80. (Copy of merit list is appended as Annexure-A) which was greater than the petitioner. Moreover, there were Five (05) posts/vacancies in union council Beshigram which were filled according to the policy i.e 40 % at Union Council Level and 60 % at District level merit bases (Copy appended as Annexure-B). In the light of approval and recommendations of the District Selection Committee, held on 28/5/2011, the posts/vacancies were categorized which is as under;

| S# | Nomenclature of post | Male | Female | Total |
|----|----------------------|---------------------|---------------------|------------|
| 1 | CT | 35 | 14 | 49 |
| 2 | Qari | 08 | 03 | 11 |
| 3 | DM | 17 | 05 | 22 |
| 4 | PET | 04 | 16 | 20 |
| 5 | Lab;Assistant | 01 | 07 | 08 |
| 6 | PST | Open.....89 | Open.....05 | 94 |
| | | Union Council....62 | Union Council....07 | 69 |
| | | Deceased.....12 | Deceased.....12 | 24 |
| | | Disable.....03 | Disable.....00 | 03 |
| | | Total; 166 | Total; 24 | 190 |

It is further commented that in union council Beshagiram two (02) posts /vacancies were filled on the basis of 40% while the remaining three(03) posts/vacancies were filled on the basis of 60 % ie District level merit but the petitioner having low score than the others and therefore could not be appointed.

- 4. That Para-4 as drafted is not correct because the entries have been made from the applications /testimonials of the candidates including the Respondent No.3(Application Form is appended as Annexure-C) and the merit list have also been prepared as well which enable the respondent No.3 for scoring 62.80 marks and placed at s.No.2 in the union council Beshagiram but it is worth mentioning here that after verification and scrutiny the documents of the respondent No.3 found fake and bogus and has been terminated from service vide order No.8146-48 dated 31/8/2012 (Copy appended as Annexure-D) which shall be filled as and when the posts were advertised accordingly but the Petitioner in this stage cannot be appointed .It is further commented that no illegality have been made by the respondent No.2 during the preparation of merit list.
- 5. That Para-5 as drafted is not correct detail has been incorporated in Para-4 above and hence needs no further comments
- 6. That Para-6 as drafted is not correct .Moreover detail has been incorporated in Para-4 above and needs no further comments.

GROUNDS

- A. That this Para is not correct and denied.
- B. That this Para is not correct and denied.
- C. That this Para is not correct and denied.
- D. That this Para is not correct and denied.

Keeping in view the facts and figure and supporting papers, it is, therefore, humbly prayed that writ petition in hands may graciously be dismissed along with cost throughout.

- That Para-5 as drafted is not correct detail has been incorporated in Para-4 above and needs no further comments.

GROUNDS

[Signature]
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION SWAT

- B. That this Para is not correct and denied.
- C. That this Para is not correct and denied.
- D. That this Para is not correct and denied.

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DISTRICT SWAT

OFFICE ORDER/APPOINTMENT

Consequent upon the decision of the Honorable Peshawar High Court Bench at Mingora (Darul Qaza) Swat, No. 4346 dated 24/12/2013 in service appeal No. 130/M of 2012 under title Rahmat Gul S/o Aziz Gul R/o Chail Behrain, District, Swat regarding the implementation of the judgment of the Honorable court in the light of the rule No: 4 Sr: No: 3 (ii) of Khyber Pakhtunkhwa civil servant (Appointment, promotion and transfer) rules 1989 the undersigned being competent authority is pleased to notify the appointment order of Mr, Rahmat Gul S/o Aziz Gul R/o Chail Behrain, District, Swat on vacant PST post at GPS Shinkoo, Swat without back benefit in BPS No: 12 (Rs: 7000-500-22000) plus usual allowances, as admissible under the rules except section-19 of Khyber Pukhtunkhwa rules 1973 with effect from the date of his taking over charge in the interest of public service subject to the following terms and conditions given below:

TERMS AND CONDITIONS.

1. The amended section 19 will be applicable in case of those civil servants who were appointed to pensionable post on regular basis before 1st day of July 2001, having regular service without any break and have applied through their department shall be given an option either to retain the benefit of pension and gratuity as allowed to them under the previous terms of appointment or to avail the benefit of contributory provident fund allowed to them under their new appointment.
2. All Degrees/Certificates will be verified from the concerned Board/ University on the expenses of the candidates concerned within one month after taking over charge.
3. The Candidates should submit challan/Bank draft in the name of controller of Examination of the concerned Board/University along with photo copies of the testimonials for verification within ten days after taking over charge.
4. In case any certificate/degree found incorrect/fake/unverified the appointment of the candidate concerned shall be cancelled automatically.
5. The original certificate/Degree and health & age certificate of the candidate must be checked before handing over charge to them by the SDEO (M) Swat or Head of the School concerned.
6. They will be governed by terms and conditions as prescribed by the government from time to time.
7. Their services can be terminated any time in case their performance is found unsatisfactory and they will be proceeded under special power ordinance 2011.

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8. They should join the post within 15 days of the issuance of this order , otherwise his appointment will be cancelled automatically.
9. In case of resignation he will have to give one month prior notice to the department or forfeit one month salary in lieu thereof to the government.
10. The candidates will not apply for transfer at least for two years.
11. The senior employees can appeal for transfer against the place of newly appointees within a month time positively, later on any appeal will not be considered.
12. No TA/DA is allowed.


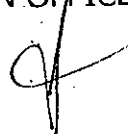
(ABDULLAH)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst: No. 3276-80 /Apptt:/PST/M

Dated. 30/11 /2014

Copy of the above is forwarded for information to:-

- 1- The Director of Elementary and Secondary Education Khyber pukhtunKhwa, Peshawar.
- 2- The District Comptroller of Accounts Swat at Saidu Sharif.
- 3- The Sub-Divisional Education officer (M) Swat.
- 4- The ASDEO (M) Concerned.
- 5- The Superintendent (M) local office
- 6- P.A to the DEO (M) Swat local office.
- 7- The Candidate Concerned.


DISTRICT EDUCATION OFFICER (M)
SWAT


PTC

Annex-E

(15)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION SWAT

Phone No. 0946-9240228-209

ORDER

In pursuance of the meeting of the District Selection Committee held on 23.05.2011, the

Executive District Officer Elementary & Secondary Education Swat being competent authority is pleased to order the appointment of the following candidates against PST vacant posts at the School noted against their names in BPS:09 Rs. 3820-230-10730/ plus usual allowances as admissible under the rules except section 19 of Khyber Pukhtun Khwa Rule 1973 with effect from the date of their taking over charge subject to the following terms and conditions given below:

PST MALE UNION COUNCIL WISE

| | | | | | | |
|----|---|--------------|------------|-------|-----------------|----------------------|
| 1 | Syed Bahar Alam Shah S/o Syed Fazal Karim | Banjor | 17.04.1988 | 63.21 | U/C A.M. Bekhel | GPS Achar No.1 |
| 2 | Muhammad Farooq S/o Said Muhammad | Sar Sardaray | 01.03.1984 | 61.81 | U/C A.M. Bekhel | GPS Uzbaka |
| 3 | Nasar Hussain S/o Fazal Rahim | Biakand | 01.03.1989 | 62.73 | U/C Arkot | GPS Shpilai |
| 4 | Hazrat Ali S/o Mamber | Sharo | 25.03.1986 | 62.27 | U/C Arkot | GPS Ochran |
| 5 | Murad Ali S/o Moamber Khan | Kala Kot | 10.04.1985 | 62.25 | U/C Asharay | GPS Pinaodai |
| 6 | Naved Ahmad S/o Nisar Ahmad | Bahrain | 12.04.1989 | 56.84 | U/C Bahrain | GPS Kulban |
| 7 | Mujeebur Rahman S/o Mirajud Din | Bahrain | 12.08.1986 | 56.59 | U/C Bahrain | GPS Kuz Alar |
| 8 | Muhammad Ismail S/o Shah Masin Khan | Baidara | 06.04.1987 | 60.52 | U/C Baidara | GPS Gharib Abad |
| 9 | Inran Khan S/o Bakht Baidar Khan | Baidara | 10.11.1983 | 59.18 | U/C Baidara | GPS Bijawra |
| 10 | Akhtar Hameed S/o Akhtar Munir | Kidani | 01.09.1988 | 61.47 | U/C Balakot | GPS Kafil Ramait |
| 11 | Imtiaz Ahmad S/o Fazal Wadood | Bara Bandai | 18.05.1988 | 60.29 | U/C Dara Bandai | GPS Malooka |
| 12 | Fazal Hayat S/o Bacha Zada Khan | Tangar | 02.03.1987 | 61.17 | U/C Barthana | GPS Gamsir No.1 |
| 13 | Taj Muhammad Khan S/o Fahim Gul | Bashigram | 01.03.1990 | 63.20 | U/C Bashigram | GPS Shinkoo |
| 14 | Umar Farooq S/o Nawsherawan | Beshigram | 14.01.1989 | 62.80 | U/C Beshigram | GPS Shalkyoo |
| 15 | Muhammad Sadiq S/o Wahid Zaman | Biha | 03.04.1989 | 62.66 | U/C Biha | GPS Qila Fazil Banda |
| 16 | Muhammad Anjum S/o Muhammad Zahid | Labal | 20.12.1988 | 61.83 | U/C Biha | GPS Barabro |
| 17 | Samiullah S/o Tajim Khan | Chuprial | 01.12.1989 | 61.93 | U/C Chuprial | GPS Gajarban |
| 18 | Noor Ali S/o Hadi Khan | Kamalay | 20.01.1986 | 60.48 | U/C Chuprial | GPS Kamalay |

| | | | | | | |
|--|--------------------------------------|---------------|------------|-------|---------------------|--------------------|
| | Nisar Ahmad S/o Fazal Rahman | Sangota | 06.01.1981 | 58.45 | U/C Dangram | GPS Saborty |
| | Shah Faisal S/o Noor ul Hadi | Rahat kot | 02.09.1985 | 60.42 | U/C Darmai | GPS Hakimabad |
| | Sayed Jamal Shab S/o Mian Rahim Jan | Ragesoon | 01.01.1989 | 60.28 | U/C Darmai | GPS Ragistoon |
| | Abdul Kabir S/o Abdul Rauf | Azad Banda | 01.05.1986 | 60.15 | U/C Darmai | GPS Kot Darmai |
| | Amjad Ali S/o Fazal Wadood | B.D.Khela | 12.01.1983 | 63.26 | U/C B.D.Khela | GPS Mandaur |
| | Kor Wadan S/o Musafar | K.D.Khela | 04.04.1984 | 62.84 | U/C B.D.Khela | GPS Bazkhela No.1 |
| | Fazal Amin S/o Muhammad Aleem | D.khela | 07.03.1987 | 61.06 | U/C B.D.Khela | GPS Bazkhela No.2 |
| | Nisar Ahmad S/o Khaista Muhammad | Fatehpur | 07.12.1982 | 61.53 | U/C Fatehpur | GPS Baban |
| | Allaud Din S/o Akhtar Munir | Fatehpur | 01.01.1989 | 60.81 | U/C Fatehpur | GPS Baban |
| | Anwar Ali S/o Muhammad Rashad | Gulibagh | 15.03.1982 | 62.68 | U/C Gulibagh | GMPS Bagla |
| | Shafiullah S/o Pashmin | Dagay | 04.04.1987 | 60.30 | U/C Gwalera | GPS Awarai Gat |
| | Hameedur Rahman S/o Amir Hatam | Koringar | 03.03.1986 | 59.94 | U/C Gwalera | GPS Muradai |
| | Habib Shah S/o Muhammad Ishaq | Hazara | 11.01.1981 | 60.81 | U/C Hazara | GPS Shaikho |
| | Noor Zada S/o Muhammad Faqir | Ashoran | 13.03.1987 | 62.83 | U/C Kalam | GPS Batandar kalam |
| | Fazal Rahim S/o Janas Khan | Ushoo | 20.04.1982 | 62.43 | U/C Kalam | GPS Matiltan |
| | Muhamamd Jamil S/o Bakht Zada | Kanju | 06.06.1986 | 62.91 | U/C Kanju | GMPS Gulonshah |
| | Sajad Ali S/o Mian Raham Dil | Khwaza Khela | 06.03.1987 | 61.06 | U/C Khwaza Khela | GPS BandaiMaira |
| | Masoodur Rahman S/o Ali Rahman | Tikdarai | 15.03.1983 | 60.93 | U/C Khwaza Khela | GPS Bandai |
| | Mian Said Bacha S/o Mian Said Bashar | Serai | 16.04.1988 | 58.16 | U/C Kishawra | GPS Sordairai |
| | Ahmad Hussain S/o Sahib Zada | Kokarai | 08.01.1987 | 59.37 | U/C Kokarai | GPS Bar Baligram |
| | Muhammad Ilyas S/o Sultanat Khan | Kokarai | 30.04.1988 | 57.30 | U/C Kokarai | GPS Kuz Gishar |
| | Mumtaz Ali Khan S/o Abdul Ahad | k. Bnadai | 01.08.1989 | 62.27 | U/C Koza Bandai | GPS Lalo Banda |
| | Noorul Amin S/o Noorul Ahad | Madyan | 11.01.1986 | 61.04 | U/C Madyan | GPS Bar Bangish |
| | Fazal Ghafar S/o Shah Furhad | Madyan | 05.05.1987 | 57.80 | U/C Madyan | GPS Kunda |
| | Mahboob Sani S/o Husan Sani | Malook Abad | 25.05.1985 | 59.36 | U/C Malook Abad | GMPS Noorullah |
| | Usman Ali S/o Samandar | Darolu | 13.12.1986 | 62.14 | U/C Mankeyal | GPS Zarina |
| | Ali Akbar S/o Muhammad Toti | Didpanai | 31.03.1981 | 62.26 | U/C Matta Kahrerai | GPS Churlaka |
| | Hamidullah S/o Ghulam Habib | Totakay | 21.10.1990 | 61.45 | U/C Matta Kahrerai | GPS Ditpanai |
| | Muhammad Alamgir S/o Hazrat Umar | Simpota | 30-3-1977 | 59.96 | U/C Matta Kahrerai | GPS Mandoor |
| | Aurang Zeb S/o Fazal Khaliq | Nowakalay (M) | 07.04.1984 | 61.99 | U/C N. K. Shah Dara | GPS Sirajabad |
| | Barkat Ali S/o Shah Kamin Khan | Pir Kalay | 26.02.1984 | 60.10 | U/C Pir Kalay | GMPS Qazinbad |

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|----|---------------------------------------|---------------|------------|-------|-------------------|---------------------|
| | Anwarul Haq S/o Shah Kamin | Sakhra | 28.12.1969 | 62.62 | U/C Sakhra | GPS Shaikhan |
| | Sikandar Hayat S/o Muhammad Amin Khan | Sakhra | 03.02.1983 | 61.98 | U/C Sakhra | GPS Garai Balkon |
| | Muhammad Zuhir S/o Gul Zaman | Shah Dherai | 02.12.1983 | 60.81 | U/C Shah Dherai | GPS Serai Shahderai |
| | Jamalud Din S/o Muhammad Ali Khan | Shah dherai | 06.05.1986 | 60.59 | U/C Shah Dherai | GPS Sekai Shahderai |
| | Ali Akbar S/o Shamshi Bahadar | Zara Khela | 20.04.1981 | 60.07 | U/C Shamozi | GPS Jabagai |
| | Muhammad Zakarya s/o tota Khan | Bar Shawar | 10.02.1985 | 61.86 | U/C Shawar | GPS Reema |
| | Muhamamd Khaliq S/o Sher Zada | Kuz Shawar | 20.04.1981 | 61.78 | U/C Shawar | GPS Kandawgai |
| 7 | Jamshid S/o Talizar | Nawakaly Shin | 15.04.1978 | 57.79 | U/C Shin | GPS Bargin |
| 8 | Niamatullah S/o Ihsanullah | Deolai | 02.08.1989 | 62.49 | U/C Deolai | GPS Shage Bawrai |
| 9 | Anwar Ali S/o Shah Wazir Khan | Manai | 03.05.1990 | 61.75 | U/C Tall | GPS Mainzkhpa |
| 10 | Bacha Nawab S/o Muhammad Qayum | Manai | 26.06.1991 | 61.60 | U/C Tall | GPS Belokhwar |
| 11 | Israr Ahmad S/o Nisar Ahmad | Totano Bandai | 01.03.1989 | 56.72 | U/C Totano Bandai | GPS Shagai Sarbala |

1ST MALE OPEN MERIT

| S.No. | Name with parentage | Address | D/O birth | Marks | Place of posting |
|---------|--|-----------------|------------|-------|--------------------------|
| 1/917 | Iqbal Hussain S/o Abdur Rauf | Kota | 07.03.1985 | 71.78 | GPS Talang |
| 2/362 | Rafiullah s/o Rehanullah | Barania Mingora | 04.03.1985 | 70.05 | GMPS Sherabad |
| 3/645 | Barkar Ali Khan S/o Bakht Amin Khan | Hazara | 01.01.1984 | 69.92 | GPS Totabanai |
| 4/291 | Muhammad Saleem Khan S/o Qavi Khan | Kandari | 10.01.1991 | 69.52 | GPS Langar |
| 5/1241 | Muhammad Raziq S/o Mian Salar | Kuz Shawar | 10.09.1984 | 69.45 | GPS Doughlai |
| 6/432 | Yousaf ali Shah S/o Muhammad Rahim Sahib | B.D.khela | 15.06.1981 | 69.25 | GPS Spinakhpa |
| 7/650 | Shawkat Ali S/o Taj Muhammad Khan | Nawakalay (M) | 10.03.1985 | 68.52 | GPS Rahimabad-2 |
| 8/430 | Muhammad Ahad S/o Muhammad Ambali Khan | Dakorak | 12.03.1985 | 68.31 | GMPS Egalbanr |
| 9/1703 | Nisar Ali S/o Sardar Ali | Khawaz Khela | 04.07.1986 | 68.24 | GPS Tikharai |
| 10/2032 | Farmanullah S/o SamiulHaq | Janoo | 18.03.1986 | 68.16 | GPS Babomara |
| 11/1121 | Hameedullah S/o Ayub Khan | Qambar | 03.05.1983 | 68.11 | GMPS Kulakarn |
| 12/902 | Attaullah S/o Habibun Nabi | Udigram | 01.06.1978 | 67.95 | GMPS Nimogram |
| 13/889 | Rahmat Ali S/o Tasir Jan | Ningolai | 01.01.1987 | 67.86 | GPS Naranpura |
| 14/1145 | Amjad Ali S/o Akbar Shah | Qambar | 18.04.1982 | 67.67 | GPS Saboney |
| 15/1398 | Sunat Ram Chawla S/o hans Raj Chawla | Shah Dara | 30.01.1985 | 67.43 | GMPS Miangano Chum |
| 16/421 | Shafiq Ahmad S/o Shakeel Ahmad | Udigram | 17.04.1983 | 67.42 | GPS Faizabad No.2 |
| 17/16 | Muhammad Tariq S/o fazal Wadood | B.D. Khela | 10.04.1977 | 67.34 | GPS Bara Duraskhela-Chum |

| | | | | | |
|---------|---|-------------------|------------|-------|-------------------------|
| 18/175 | Njacebullah S/o Ihsanullah | Banar | 01.04.1987 | 67.19 | GPS Saidarabala |
| 19/467 | Shakirullah S/o Muhammad Jan | Dandanai | 03.01.1989 | 67.11 | GPS Dandanai |
| 20/1616 | Izat sher S/o Muhammad | Khwaza Khela | 02.02.1985 | 67.03 | GPS Birarai |
| 21/425 | Sultan Ali S/o Habibur Rahim | Udigram | 10.01.1984 | 66.91 | GPS Balogram |
| 22/476 | Farid Ahmad S/o Chanary | Madyan | 01.04.1985 | 66.89 | GPS Lalshish Balakot |
| 23/341 | Javid Ashraf S/o Shah Rawan | Shalpin | 01.06.1987 | 66.86 | GPS Shery |
| 24/754 | Noour Ullah S/o Muhammad Zeb | Kalakot | 10.02.1987 | 66.75 | GPS Pirabad |
| 25/ | Noor Ul Wahab S/o Shamsul Wahab | Totano Bnadai | 22.06.1988 | 66.67 | GMPS Danda |
| 26/29 | Aurang Zeb S/o Shahinshah | Kabal | 03.03.1980 | 66.66 | GMPS Tanchai |
| 27/305 | Rahman Hadi S/o Fazal Rahim | Hazara | 08.06.1989 | 66.57 | GPS Qambo |
| 28/649 | Shahid Khan S/o Muhammad Shah Khan | Tindodag | 03.03.1986 | 66.43 | GPS Gogdara |
| 29/1400 | Saeddullah Khan S/o Ashnagharay | Jehan Abad | 15.01.1986 | 66.38 | GMPS Mainz Gat |
| 30/08 | Syed Jehan Shah S/o Muhammad Kamal | Mashkomai | 01.04.1977 | 66.30 | GPS Topsin |
| 31/981 | Fazal Sher S/o Sherin Zada | Nawakalay | 04.02.1987 | 66.16 | GPS Sangrai |
| 32/420 | Mushtaq Ahmad S/o Shakeel Ahmad | Udigram | 01.09.1985 | 66.11 | GPS Samsaray |
| 33/1570 | Muhamamd Shafiq S/o Karwanay | Deolai | 03.04.1979 | 66.08 | GPS Bala Deolai |
| 34/1266 | Attaullah Shah S/o Inyatullah | Kanju | 01.04.1976 | 66.06 | GPS Damgahr No.2 |
| 35/431 | Habib Ali Khan S/o Shamsheer Khan | Chalyar | 01.03.1984 | 65.99 | GPS Manpitai |
| 36/969 | Arshad Iqbal S/o Ruhul Amin | Chail Shagai | 02.04.1978 | 65.93 | GPS Kadona |
| 37/269 | Amjad Ali S/o Khurshid Khan | Chupriyal | 13.03.1984 | 65.78 | GPS Chungai |
| 38/803 | Fida Ullah Khan S/o Ahmad Jehan Khan | Seer | 11.02.1986 | 65.68 | GPS Khwarpatai |
| 39/790 | Noorul Ahad Mian S/o Mian Muhammad | Serai | 05.03.1986 | 65.68 | GPS Bar Jabar |
| 40/1035 | Muhamamd Asad Sardar s/o Sardar Ali | Panr | 02.08.1983 | 65.59 | GPS Sabonay |
| 41/1365 | Bakht Naeem Khan S/o Bakht Mandyar | Morpandai | 01.01.1978 | 65.55 | GPS Pardishah |
| 42/1867 | Arsahd Ali S/o Sultani Rom | Chamtaali | 25.04.1986 | 65.53 | GPS Urdan |
| 43/17 | Abbas Ali S/o Fazal Wadood | B.D.Khela | 09.02.1980 | 65.50 | GPS Bara Durashkhela |
| 44/766 | Bahadar Khan S/o Tota khan | Bar Shawar | 20.02.1987 | 65.36 | GPS Onar (Waina) |
| 45/176 | Irfanullah S/o Ihsanullah | Banr | 04.06.1985 | 65.31 | GMPS Amir Khan |
| 46/1777 | Nisar Ahmad S/o Khalid Khan | Toatano Bandai | 15.02.1976 | 65.23 | GPS Soray Sharifay |
| 47/1302 | Ikramul Haq S/o Hussnul Maab | Shin | 01.11.1989 | 65.21 | GPS Sangrai |
| 48/426 | Liaqat Ali S/o Muhamamd Jan | Sharif Abad | 05.01.1979 | 65.18 | GPS Patanai |
| 49/888 | Rahmat Ali S/o Muhammad Ibrahim | Ningoi | 10.01.1988 | 65.10 | GPS Pirkalay |

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| | | | | | |
|----|------------------------------------|---------|------------|-------|---------------|
| 87 | Shafiullah S/o Abdullah | Nasrat | 07.06.1979 | 63.37 | GMPS Shabbika |
| 88 | Salim Akhtar S/o Khuna Gul | Kabal | 07.04.1982 | 63.35 | GMPS Shinkay |
| 89 | Shah Wazir Khan S/o Muhammad Wazir | Dakorak | 01.01.1989 | 63.31 | GPS Kandaw |

PST MALE DECEASED SONS

| | | | | | |
|---------|------------------------------------|----------------|------------|-------|---------------------|
| 1/137 | Mian Rahim Shah S/o Main Sahib Jan | Gulibagh | 02.01.1984 | 60.88 | GMPS Barjabar |
| 2/2106 | Laiq Zada S/o Ahmad Gul | Biha | 03.03.1989 | 58.55 | GPS Fazal Banda |
| 3/1191 | Sajid Hussain S/O Muhamamd Iqbal | Tangar Matta | 01.01.1989 | 58.31 | GPS Bahadar Banda |
| 4/1444 | Sajjad S/o Shah Bacha | Galech | 23.04.1985 | 58.26 | GPS Taghma |
| 5/1537 | Navced Ali S/o Dost Muhammad Khan | Balogram | 18.04.1984 | 55.64 | GPS Ghakhi Banda |
| 6/479 | Zeeshan Khaliq S/o Fazal Khaliq | Kokarai | 04.05.1990 | 51.45 | GPS Gorikla |
| 7/1692 | Attaur Rahman S/o Khalid Khan | Sapal Bandai | 02.01.1984 | 50.46 | GPS Jawaz |
| 8/206 | Nasim Hijaz S/o Bacha Zada | Tangar | 17.01.1988 | 49.44 | GMPS Shingra Sujanr |
| 9/155 | Ihsanullah S/o Muhammad Dost | K.D.Khela | 20.07.1989 | 48.13 | GMPS Jukhtai |
| 10/1094 | Ihsanullah S/o Abdul Wahab | Aligram Shawar | 20.03.1990 | 45.14 | GPS Aligram |
| 11/105 | Rahman Hadi S/o Muhammad Khan | Ashoran | 05.07.1979 | 45.11 | GPS Anakar |
| 12/1409 | Zafarullah S/o Faiz Muhammad | Miandam | 20.03.1985 | 44.07 | GPS Kalwan |

PST MALE DISABLED

| | | | | | |
|--------|-------------------------------|-----------|------------|-------|-----------------|
| 1/282 | Zahid Khan S/o Bostan Khan | Mashkomai | 12.04.1989 | 62.91 | GMPS Dadangalai |
| 2/701 | Hussain Karim S/o Fazal Karim | Kalakaly | 02.03.1985 | 62.35 | GPS Mohd Baig |
| 3/1890 | Subhan Ali S/o Ali Akbar Mian | Tikdarai | 1.04.1986 | 59.81 | GPS Saidu |

TERMS & CONDITIONS:

1. The amended section 19 will be applicable in case of those civil servants who were appointed to a pension able post on regular basis before 1st day of July 2001, having regular service without any break and have applied through their Department shall be given an option either to retain the benefits of pension and gratuity as allowed to him under his previous terms of appointment or to avail the benefit of contributory provident fund allowed to him under his new appointment.
2. All the Degrees /certificates will be verified from the concerned Board/ University by DDO (Male) on the expenses of the candidate concerned within one month after taking over charge.
3. The new appointee should submit challan/ Bank drafts in the name of controller of Examination of the concerned Board/ University along with photocopies of the testimonials to the DDO (Male) for verification within Fifteen days after taking over charge.
4. In case any certificate / degree found incorrect/ fake/ unverified the appointment of the candidate concerned shall be cancelled automatically.
5. The Original certificate/ Degree and health & age certificate of the candidate should be handed to him by the Head of the concerned school.
6. They will not be handed over charge if their age is less than 18 years or more than 35 years.
7. Charge Reports should be submitted to all concerned.
8. They will be governed under terms and conditions as prescribed by the government from time to time.
9. Their services can be terminated in any time in case their performance is found unsatisfactory and they

| | | | | | |
|---------|-------------------------------------|------------------|------------|-------|-------------------------|
| 59-1500 | Muhammad Ibrahim S/o Shah Zarin | Shah Dherai | 02.05.1978 | 65.09 | GMPS Khwarpatai (Kabal) |
| 59-118 | Muhammad Arif S/o Muhammad Qasraish | Madyan | 08.04.1980 | 65.04 | GPS Paklai |
| 59-11 | Ijaz Ali Khan S/o Muhammad Aqil | Nawakalay (shin) | 05.03.1985 | 65.03 | GPS Bar Bargin |
| 59-188 | Ibrar Ali S/o Sha Wazir Kahn | Mashkomai | 17.03.1986 | 64.95 | GPS Gidar Sar |
| 59-111 | Shafiq Ahmad S/o Umar Khitab | Qandil | 20.04.1988 | 64.92 | GPS Osar |
| 59-139 | Alcem Khan S/o Fazal Rahman | Kotlai | 04.01.1990 | 64.75 | GPS Kasai Malnga |
| 59-859 | Izid Iqbal s/o Muhammad Khan | Galoch | 01.06.1987 | 64.74 | GPS Nimakar |
| 59-119 | Azal shah S/o Mian Badshah | Chuprial | 04.04.1983 | 64.72 | GPS Awisha |
| 59- | Attaullah S/o Abdur Rauf | Azada Banda | 22.05.1988 | 64.65 | GPS Kharkay |
| 59-1951 | Nooran Shah S/o Umar Pervez | Atanganj | 10.03.1990 | 64.62 | GPS Roria |
| 60-11 | Ali Rahman S/o Azizur Rahman | Kuza Bandai | 30.12.1984 | 64.62 | GPS Tarai |
| 61-200 | Zafar Iqbal S/o Muhammad | Aligrana | 25.08.1986 | 64.49 | GMPS Dendanai |
| 62-24 | Sanaullah S/o Muhammad Qasim | Deolai | 05.12.1991 | 64.48 | GMPS Bakaraj(Q) |
| 63-143 | Abdullah Shah S/o Nowsherawan | Seigram | 04.10.1983 | 64.44 | GPS Tangaishah |
| 64-1590 | Roshan Ali S/o Sher Afzal | Shinkad | 05.03.1987 | 64.37 | GMPS Jabargat |
| 65-121 | Rahmat Zada S/o Faqir Gul | Kuza Bandai | 05.01.1989 | 64.36 | GPS Qwanj |
| 66-1180 | Imtiaz Ahmad S/o Fasih Ahmad | Aligrana | 15.06.1981 | 64.28 | GPS Bakaraj |
| 67-130 | Fazal Wa'ud S/o Abdul Qayum | Galoch | 20.06.1986 | 64.22 | GPS Tarkanai |
| 68-994 | Ajmal Khan S/o Tajbar Khan | Pashtunai | 10.03.1991 | 64.17 | GPS Sardam |
| 69-1526 | Kilayatullah S/o Azizur Rahman | Janoo | 01.03.1980 | 64.11 | GPS Yarogay |
| 70-859 | Muhammad Zeb S/o Muhammad Amin | Kuz Shawar | 01.03.1987 | 64.03 | GPS Kuz Kad |
| 71 | Ishfaq Ahmad S/o Qubad Khan | Qambar | 10.03.1983 | 64.02 | GPS Balogram |
| 72-1042 | Muhammad Ali S/o Rozi Anad Khan | Mashkomai | 02.02.1986 | 63.91 | GPS Mashkomai Maura |
| 73-307 | Hukhar S/o Sher Akbar Khan | Barkalay | 15.03.1990 | 63.90 | GPS Kotanai |
| 74-314 | Karimullah S/o Muhammad Ishaq | Maliah | 10.01.1985 | 63.89 | GPS Mohd Baig |
| 75 | Eniz Ali Shah S/o Ahmad Jan | Madyan | 10.04.1989 | 63.78 | GPS Katal |
| 76-62 | M. Latifullah S/o Abdul Latif | Malook Abad | 09.03.1986 | 63.75 | GPS Rahimabad |
| 77-61 | Muhammad Salam S/o Muhammad Anwar | Baha | 03.10.1985 | 63.71 | GPS Bahadar Banda |
| 78-1995 | Mehmood Fazal S/o Fazal Hamid | Fatehpur | 01.04.1988 | 63.67 | GPS Chancharay |
| 79-941 | Sajjad Ali Khan S/o Didar Ali Khan | Khwaza Khela | 22.04.1986 | 63.60 | GMPS Ziarat |
| 80-063 | Rahman Hadi S/o Fazal Rahim | Haza | 08.06.1989 | 63.57 | GPS Tootbanai |
| 81-1362 | Irfan Saleem S/o Muhammad Suliman | Kuza Bandai | 10.03.1988 | 63.55 | GPS Narangpura |
| 82-1382 | Umar Sharif S/o Umar Razaq | Islampur | 01.03.1987 | 63.53 | GPS Mutrapaindai |
| 83-29 | Sheraz S/o Muhammad Rom | Charbagh | 04.03.1989 | 63.52 | GPS Serat(Kishwra) |
| 84-573 | Shahab Zada S/o Muhammad Zada | Fatehpur | 01.03.1981 | 63.49 | GPS Kalwara |
| 85-241 | Naeemullah S/o Umara Khan | Jambil | 02.01.1991 | 63.47 | GPS Kula dag |
| 86-141 | Nisar Ali S/o Salih Gul | Fatehpur | 01.12.1982 | 63.45 | GPS Khairabad |

18

✓

will be proceeded under special power ordinance 2000.

10. They should join the post within one month of the issuance of this order other wise their appointment will be cancelled automatically.
11. in case of resignation they will have to give one month prior notice to the Department or forfeit one month salary in lieu thereof to the government.
12. The new appointees will not apply for transfer at least for two years.
13. The senior employees can appeal for transfer against the place of new appointees within a month time positively, later on any appeal will not be considered.
14. No TA/ DA is allowed.

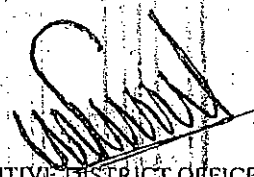
(SULTAN MEHMOOD MIAN)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION SWAT

Encls: No. 10046-53 /Appointment/2011

dated 30-6/2011

Copy to: -

1. The Director Elementary and Secondary Education Khyber Pukhtun Khwa Peshawar.
2. The District Coordination Officer Swat.
3. The District Accounts Officer Swat.
4. The DDO(Male) Primary Swat.
5. The ADO Male concerned.
6. The Superintendent Primary local office.
7. The candidate concerned.
8. PA to EDO local Office.


EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION SWAT

Annex - F

RS. 30/-

~~Annex C~~

APPLICATION FORM FOR THE POST OF PST

FORM NO 1190

19

Executive District Officer,
Schools & Literacy, Swat.

Name of the Applicant (in Block letter) Uma Farooq
 Father's Name Nawsherman
 3. Residence Bashigram
 4. Date of Birth 14th of January 1989 (14-01-1989)
 5. Postal Address Village Bashigram Tehsil (Behram Ditt Swat)
 6. Date of Passing PTC examination _____
 7. Name of Institution from which passed PTC Exam: A.G.O University Islamabad
 8. Name of Union Council Bashigram
 9. Name of Tahsil (Matta / Babozai) Babozai
 Constituency PKP 85

QUALIFICATION Formula = Marks obtained X Prescribed Marks

| S.No | Examination | Prescribe Marks | Marks Obtained | Total Marks | Percentage as per formula |
|------|-------------|-----------------|----------------|-------------|---------------------------|
| 1 | S.S.C | 30 | 611 | 850 | 21.564706 |
| 2 | FA / F.Sc | 20 | 609 | 1100 | 11.072727 |
| 3 | P.T.C | 30 | 632 | 900 | 21.066667 |
| 4 | BA / B.Sc | 10 | 335 | 350 | 6.090909 |
| 5 | MA / M.Sc | 05 | 05 | 05 | 5.3 |
| 6 | Experience | 05 | 05 | 05 | 64.795009 |
| | G.Total | 100 | | | |

1/2
14

Experience in Education Department as teacher 20 days 6 Months 2 years
 1 years = 02, 03 years = 03, 04 years = 04, 05 years = 05 marks.

Note: - Attested Photocopies of the following documents / Certificates to be attached with the form

- ✓ 1. S.S. Certificate / DMC
- ✓ 3. BA / B.Sc Degree / DMC
- ✓ 5. P.T. Certificate / DMC
- ✓ 7. National Identity Card
- ✓ 8. Employment exchange card
- ✓ 10. Residential certificate showing Union council signed by the cluster in charge.
- (2) FA / F.Sc certificate / DMC
- (4) MA / M.Sc Degree / DMC
- (6) Domicile Certificate.
- (8) Service certificate
- (9) Experience certificate

SIGNATURE OF APPLICANT

Signature of Cluster In charge
PRINCIPAL,
 Govt. High School,

13

Two years 6 months

~~Annex-4~~
Annex-4

148

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND
SECONDARY EDUCATION SWAT.**

20

NOTIFICATION.

Consequent upon the declaration of S.S.C certificate as Fake and Bogus by the Assistant Controller Board of Intermediate and secondary Education Swat saidu sharif vide his letter No:3780-82/Cetr/BISE,Swat dated 30 July 2012.

The under signed is hereby pleased to terminate Mr,Umar Farooq S/O Nawsherawan R/O Bashigram appointed as PST at GPS Shalkyar, swat at S:No:14 (U/C Bashigram) vide this office order Endst:No:10046-53/Apptt:/2011 dated 30/06/2011 from the date of issue of the above mentioned order as per condition No:5 of the terms and conditions given in the relevant appointment order in the interest of public service.


(SULTAN MEHMOOD MIAN)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION SWAT.

Endst:No: 0146-48 /Appeal/M/PST

Dated 31/8/ /2012

Copy of the above is forwarded to the:-

- 1- District Accounts officer Swat at Saidu Sharif.
- 2- Deputy District officer (M) E/S Education Swat with the remarks to recover the amount of salaries from the date of his taking over charge upto the date of his termination immediately under intimation to this office.
- 3- Head teacher GPS Shalakyar Swat for information and necessary action.
- 4- P.A to Executive District officer E/S Education Swat local office.


EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION SWAT

s/c

OFFICE OF THE ASSISTANT DISTRICT OFFICER (E & SE), CIRCLE MADYAN,
DISTRICT SWAT

NO 20

Dated 11/09/2012

(21)

To

Mr, Umar Farooq PST
GPS Shaklar, Circle Madyan

Annex-5
H

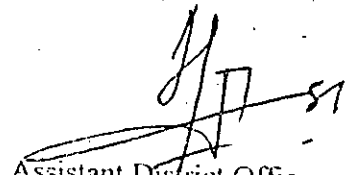
Subject: Termination

Memo

Reference Deputy District Officer, (E & SE) Swat letter No 2878 Dated 03-09-2012 regarding you have terminated from your service / job due to fake and bogus your SSC Certificate, verified by Assistant Controller Board of Intermediate and Secondary Education Swat.

You are directed to deposit Rs. 187165/- w.e.f 01-07-2011 to 31-08-2012 into Govt. Treasury on Challan within a week of the issuance of this letter immediately with information to DDO (M) Primary Swat and EDO (E & SE) Swat.

In case of any delay / irresponsible behavior you will be personally responsible for any consequences.


Assistant District Officer
Elementary and Secondary Education Swat

No _____

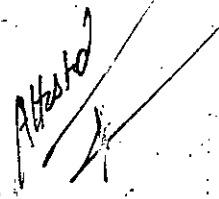
Copy forwarded for information and necessary action to.

1. Executive District Officer (E & SE) Swat
2. Deputy District Officer (E & SE) Swat

Recovery
Letter

11/9/2012

Assistant District Officer
Elementary and Secondary Education Swat



11/9/12

Annex - I

22

C.V

S.No: _____

NAME: LIMAR FAROOQ

Cell No: _____

| PERSONAL INFORMATION | |
|--|---|
| FATHER,S NAME | Now SHER WAN |
| DATE OF BIRTH | 14-01-1989 |
| DATE OF 1 st APPOINTMENT (Joining date) | 30-06-2011 - 01-07-2011 |
| POST | P-S-T |
| PRESENT SCHOOL | G.P.S. SHAL KIAR |
| HOME ADDRESS | Village Bahadram-plo madyan Swat |
| GP FUND /CP FUND NO | |
| CNIC NO | 15602-1855477-5 |
| BANK A/C NO & BRANCH NAME | 0458-7100077903- Madyan ^{Head} |
| CONTACT NO | 0364-988618 |
| PERSONAL NO | |
| UNION CONCIL | BACHEG RAM |
| DOMICILE | SWAT |
| DATE OF RETIRMENT | |
| BPS | 09 |
| MARITAL STATUS | MARRIED |
| NO OF CHILDREN M+F= | 1+1 |
| LAST TRANSFER OR NO WITH DATE | |

Academic & Professional Qualification

| CERTIFICATE | SESSION | ROLL NO | TOTAL MARKS | OBTAINED MARKS | GRADE | DIVISION | BOARD/UNIVERSITY |
|-------------|---------|---------|-------------|----------------|-------|----------|------------------------|
| ✓ SSC | 2003 | 210909 | 850 | 384 | D | | BISE Swat |
| ✓ FA/Sc | 2005 | 180747 | 1100 | 609 | C | | BISE Swat |
| ✓ BA/B.Sc | 2010 | 5354 | 550 | 335 | B | | University of Peshawar |
| MA/M.Sc | | | | | | | |
| ✓ PTC | 2010 | 064800 | 900 | 630 | A | | AIOM Islamabad |
| CT | | | | | | | |
| B.Ed | | | | | | | |
| M.Ed | | | | | | | |

THE ABOVE INFORMATIONS ARE CORRECT IN MY KNOWLEDG.

Head Master

Govt: Primary School

Chall Shal Kiar, Swat.

Code No: 22158

COUNTER SIGN BY HEAD MASTER

SIGNATURE

Show Cause Notice

Recd:

7/8/12

Annex-A

25

OFFICE OF THE DEPUTY DISTRICT OFFICER (I) E&S EDU:SWAT.

NO. _____

Dated _____/2012.

To,

UMAR FAROOQ PBT
CPS SHALKYAR SWAT. *Maydan*

Subject: STOPPAGE OF PAY / SHOW CASE NOTICE.

Memo:-

Reference Executive District Officer E&S Edu:swat No 6992 dated 06/08/2012 on the subject cited above.

You are directed to attend the Office of the Executive District Officer E&S Education swat at Gul Kada within Fifteen ^{alongwith} days and written reply of the attached Show Case Notice.

Other wise disciplinary action will be taken against

you.

Sd/
DEPUTY DISTRICT OFFICER (I)
E&S EDU:SWAT.

7/8/12

Encl: No 666-61

Copy of the above is forwarded to the:-

- 01/ Executive District Officer E&S edu: swat vide your kind No. & Dated cited above. for information.
- 02/ ADO Circle Maydan swat for n/action.

[Signature]
DEPUTY DISTRICT OFFICER (I) E&S
EDU: SWAT.

BEFORE THE SERVICE TRIBUNIL K.P:K PESHAWAR.

Service appeal NO. 239 OF 2013.

1.Umer Farooq S/O Nowsherwan PST GPS Shalkyar Bashigram R/O
Bashigram , Tehsil Behrain.

(Appellant)

VERSUS

1.District Coordination Officer District Swat.

2.Executive District Officer District Swat.

(Respondents)

Rejoinder for on behalf of the appellant

Respectfully submitted.

Rejoinder for preliminary objections.

1.incorrcect hence denied, being civil servant appellant has due rights to file the instant appeal.

2.incorrect hence denied, appellant approach this Honorable court with clean hands.

3.incorrect hence denied nothing been concealed from this Honorable court.

4.incorrect hence denied , all mentio red been done according to law.

5.incorrect hence denied, nothing against the law, rules & policises.

6.incorrect hence denied, appellant conduct is quite clear rather the conduct of respondents is not fair and clear.

7. incorrect hence denied, very much maintainable for the reason cited was accepted for proceeding further by the honorable member of this honorable tribunals.

10. incorrect hence denied appeal is within time.

11. That appeal was not filed after the coated judgment it was in due time and there is no bar in the same so much so nothing mentioned in the order regarding the appellant contesting the W.P so if appellant didn't not heard he has the due right be heard and respondents malafidely done due to his blue eyed person.

Rejoinder for facts.

1. Incorrect hence denied, first advertisement made after the same entire testimonials been checked and verified through proper channel along with original documents then appointment been made in verification of the original documents round about six months been passed it is to be noted that verification of the marks 384 been done not of the any other else then appellant been released salaries. It is to be noted that for verification original documents is must then how is it was possible that appellant submitted the fake documents and same was verified it is further to be noted that round about five, six places documents were submitted by the appellant and all same were cleared till the verification then on basis of the same salaries been issued from finance. so question been raised that after completion of all codal formalities and finalization what aver the story been developed by the respondents that is their own no relevancy with appellant and same been made to gain some financial benefits to received loss appellant and to obliged their blue eyed person. As for as concerned the judgment of the Peshawar high court in said vacant post been mentioned but so much so in same appellant side nothing been mentioned or submitted being civil servant appellant has the right to file the present before proper channel.

2. Incorrect hence denied detail already been given in Para no. 1.

3. incorrect hence denied as clearly been mentioned in detail in Para no. 1 that verification been made on basis of the same appellant was appointed properly.

4. Incorrect hence denied. As narrated in appeal .

5. incorrect hence denied detail already been given in Para no .1.

6. incorrect hence denied due to the verification which is attached with appeal appellant was appointed and later on what aver the changes that was the self made changes of the respondents reason best known to them.

7. Incorrect hence denied nothing full fill according to law and in hast and fast manner appellant was terminated not full fill the procedure of law.

8. Incorrect hence denied as Para no 8 of the appeal.

Rejoinder for Grounds.

A. Incorrect hence denied along with appeal grounds Para no 1 of the rejoinder is detail of rejoinder.

B. Incorrect hence denied as narrated in Para 7 of the rejoinder and appeal Para no 7.

C. Incorrect hence denied rejoinder of the same already been given in Para no .7 along with Para no .3 of the grounds.

D. Incorrect hence denied rejoinder of the same is Para no 1 and 7 of the facts along with appeal grounds d.

E. Incorrect hence denied nothing was followed according to laws as mentioned in pares no .1, 2 and 3 of the rejoinder.

F. Incorrect hence denied Para 1 of the rejoinder is detail for the same.

G. Incorrect hence denied nothing been followed according to law nor done the processes according to law.

H. Incorrect hence denied Para 1 of rejoinder is given in the same .

I. Incorrect hence denied already detail been given in pares no1,2,3, & 7 of the rejoinder.

J. Incorrect hence denied nothing mentioned like 611 actual marks showed and same was verified.

K. Incorrect hence denied noting followed according to law.

L. Incorrect hence denied detail been given in Para no . 1 of rejoinder.

It is therefore most humbly prayed that on acceptance of this rejoinder appeal of the appellatant may kindly be allow as prayed for.

Through Appellant
L.Nawab Ali Noor
Advocate High Court Peshawar.
03469076945
2/2016

certificate. Certified as per instruction of my client (appellatant) that all the contents of rejoinder are true and correct

L.Nawab Ali Noor
Advocate High Court Peshawar
03469076945
2/2016

BEFORE THE SERVICE TRIBUNAL K.P.K,
PESHAWAR

Service appeal No.239 of 2013

Umer FarooqAppellant

Versus

District Coordination Officer Distt: Swat and otherRespondents

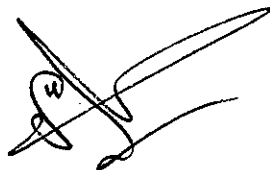
Application for grant of adjournment

Respectfully Sheweth:.

The appellant Submits as under:

- 1) That eh above mentioned Case has been fixed before this August Court for 04-01-2017.
- 2) That the counsel for appellant will be busy before Session Judge, Additional Session Judge and Civil Courts of Timergara in cases of (1) Gul Shehzada Versus Lajbar (2) Mst. Amina Versus Ibrahim (3) Asad Hassan Versus Muhammad Masood and others (4) Khurshid Versus State and Fazilt Versus Rozamen for the cited reason it will be very difficult to attend this Honorable Tribunal on same reason.

It is therefore humbly prayed that the case may kindly be adjourned.



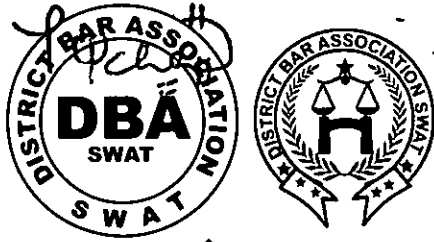
Appellant Through Counsel

NAWAB ALI NOOR ADVOCATE

Dated: 04-01-2017

سرینمبر: 37624

بار کونسل نمبر: 10-19123:65-x
 بار ایسوسی ایشن نمبر: 118
 رابطہ نمبر: 0333-9545615



ڈسٹرکٹ بار ایسوسی ایشن سوات

بعدالت جناب: سروس ٹریبونل کے کورٹ ایٹا (کل کمرہ سید عسر علی سہود)

صاف
 6/10/18

منجانب: عمر فاروق صاحب
 عمر فاروق صاحب



دعویٰ اور خواست:
 علت نمبر:
 مورخہ:
 جرم:
 تھانہ:

بامث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام کل کمرہ سید عسر علی سہود کو مقرر کر کے
 اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ
 کرنے و تقریر ثالث کرنے، دعویٰ جواب دعویٰ، اقبال دعویٰ، اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری
 یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ
 مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمرازہ یا اپنے بجائے تقریر کا اختیار ہوگا
 اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران
 مقدمہ جو خرچہ و ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی
 مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم
 پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،
 لہذا وکالت نامہ لکھ دیا کہ سندر ہے

Attested and
 Accepted

کے لئے منظور ہے۔

مقام کل کمرہ سید عسر علی سہود

عمر فاروق صاحب

ایڈوکیٹ اسٹنٹن
 سید عسر علی سہود

الرقوم: 06-06-018

لقدالت جناب سروریں شریعتی لیسٹ اور لیسٹ کورٹ سوات

کتابت
M.A. Shakti

عرفان بنم ایجوکیشن

مقدمہ نمبر 239/013

محررہ 7⁶/₁₈

درخواست نمبر تبدیل تاریخ پستی لیسٹ
موجودگی ویل لیسٹ

جناب عالی! درخواست حسب ذیل عرفی ہے۔

I۔ یہ کہ مقدمہ عنوان بالا عدالت حضور میں زیر سماعت ہے۔
جس میں آج تاریخ پستی مقرر ہے۔

II۔ یہ کہ سائیل / لیسٹ کا وکیل سید کریم شاکان ایڈووکیٹ تین عدالت
لینوان آجرت بنم طور گل، آغان اللہ بنم عوث الرحمن (3) دینا زیب
بنم سرکار میں پستی لیسٹ اور بالی کورٹ منگورہ سوات میں
معروف ہے۔

لکھنا اسد عا ہے۔ کہ سمفوری درخواست

عدالت سائیل / لیسٹ لیسٹ آج مورخہ 7⁶/₁₈ 018

کی تاریخ پستی تبدیل کرنے کا حکم صادر فرمائی۔

Shakti Ali

عرفان بنم ایجوکیشن
موجودگی ویل لیسٹ
محررہ 7⁶/₁₈

کعبالت جناب سعید مسعود ٹرسٹ K.P.K. سیٹیاور۔

عمر فاروق بنام ام الجوسین
27/7/2018
Allama

درخواست ہماری تصدیق کے ساتھ پیش کی جویا تا دم

جناب عالی! حسب ذیل درخواست ہے۔

1) زکریا محمد عنوان ملا عبدالصغور سے زکوٰۃ کے بارے میں سوال اور
تاریخ 27/7/2018

2) سید مسعود علی کا جواب کی تاریخ 27/7/2018 اور درخواست میں C.M.C.P.

no 3/p/2018 شامل انعام اللہ بنام جواب علی ایڈریس میں
مصدق ہے اور آج اس کے ساتھ تصدیق کے ساتھ پیش کی جویا تا دم

سوائے کہ قانون و انصاف کا تقاضا ہے کہ سوائے اس کے کہ آج تاریخ
میں شامل ہے

کریڈٹ اسٹیکارڈ کے بارے میں درخواستیں
سوائے اس کے کہ آج تاریخ میں شامل ہے

گراف
27/7/2018

BEFORE THE BENCH SERVICE TRIBUNIL PESHAWAR.

S. Appeal NO. OF

1. Umer Farooq

.....(Appellant)

VERSUS

1. Secretary to Govt of K.P.K (E & SE) Peshawar & others.

..... (Respondents)

Application with humble request for adjournment in above Titled S.Appeal fixed before this Honorable court for 10.10.2018.

Respectfully Submitted:

1. That the above mentioned titled S.Appeal is fixed before this Honorable tribunal for 10.10.2018.
2. That counsel for the appellant will be busy on 10.10.2018 before Peshawar High Court Darul Qaza Mingora Bench in W.P NO. 123/M/2014 titled Faiz Muhammad & others vs Secretary n to Govt of K.P.K E & SE Peshawar others.
3. That for the reason mentioned above it will be very difficult for counsel of appellant to attend this Honorable tribunal .

It is there for most humbly prayed that on acceptance of this application your honor may kindly adjourn the Appeal for today and may please fixed for any other date which convenient to this Honorable court.

Dated : 10.10.2018

Appellant's counsel

L. Nawab Ali Noor Advocate
High Court Peshawar.
03469076945