Service Appeal No.4277/2021 titled "Rusat Khan-vs-Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar and others", decided on 22.09.2022 by Division Bench comprising Kalum Arshad Khan, Chairman, and Fareeha Paul. Member, Executive, Khyber Pakhtunkhwa Service Tribunal. Camp Court Abbottabad.

#### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CAMP COURT ABBOTTABAD.

# BEFORE:KALIM ARSHAD KHAN ... CHAIRMANFAREEHA PAUL... MEMBER (Executive)

#### Service Appeal No.4277/2021

#### Versus

- 1. Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2. Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
- 3. Director Higher Education Peshawar.
- 4. Principal Govt: Post Graduate College No.1, Abbottabad.

.....(Respondents)

Present:

Mr. Muhammad Arshad Khan Tanoli, Advocate......For appellant.

Muhammad Jan, District Attorney......For respondents.

Date of Institution	30.03.2021
Dates of Hearing	22.09.2022
Date of Decision	

APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT HAS BEEN REMOVED FROM SERVICE VIDE REMOVAL FROM SERVICE ORDER NO.SO(COLLEGES)/09-2010/XI-8/2006 DATED 26.07.2010 WHICH IS PERVERSE, DISCRIMINATORY AND THE SAME IS LIABLE TO BE SET-ASIDE.

#### JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN.: Brief facts of the case are that

the appellant was appointed as Lecturer in Computer Science in Govt. Post

Graduate College No.1 Abbottabad vide appointment order dated

Service Appeal No.4277/2021 titled "Riasat Khan-vs-Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar and others", decided on 22.09.2022 by Division Bench comprising Kalim Arshad Khan. Chairman, and Fareeha Paul, Member, Executive, Khyber Pakhtunkhwa Service Tribunal. Camp Court Abbottabad.

01.08.2022; that the appellant applied for Ex-Pakistan leave for two years. His application for ex-Pakistan leave was duly processed by the respondents but the said leave was not duly sanctioned in this regard; that the appellant, without getting Ex-Pakistan leave sanctioned, went abroad and during his absence period he was removed from service vide impugned order dated 26.07.2010; that the appellant, on reaching, back to Pakistan applied to respondents No.2 and 3 for joining his service through representation dated 18.11.2020; that the respondent department provided copy of impugned order dated 26.07.2010 on 25.11.2020, against which the appellant filed departmental appeal on 18.12.2020 which was not responded within ninety days, then he filed this service appeal in this Tribunal.

2. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who, on putting appearance, contested the appeal by filing written reply raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.

3. We have heard learned counsel for the appellant and learned District Attorney for the respondents.

4. The learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned District Attorney controverted the same by supporting the impugned order.

5. In this case the appellant while in service intended to go abroad and for the purpose he applied for two years Ex-Pakistan leave but the leave was not sanctioned. It is in the memo and grounds of appeal stated by the

Ŝ¢'.

Service Appeal No.4277/2021 titled "Riasat Khan-vs-Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar and others", decided on 22.09.2022 by Division Bench comprising Kalim Arshad Khan, Chairman, and Fareeha Paul, Member, Executive, Khyber Pakhtunkhwa Service Tribunal, Camp Court Abbottabad

appellant himself that without getting Ex-Pakistan leave sanctioned, he went abroad and during the period of his absence he was removed from service on 26.07.2010. It is also stated by him that on his return to Pakistan he filed applications to join service on 18.10.2020. In the application for reinstatement he could not justify his proceeding abroad without sanctioned leave and/or permission from the competent authority. Being a civil servant there are certain liabilities, duties and maintenance of service discipline upon the appellant but without caring for that and without the pleasure of the competent authority or for that matter the permission or leave, the appellant has admittedly gone abroad and after ten (10) long years submitted application for reinstatement which is not at all justified nor any justification has been given by the appellant or even any explanation much-less convincing to grant him the desired relief.

6. Therefore, we see no merit in this appeal. This appeal is thus dismissed. Costs shall follow the event. Consign.

7. Pronounced in open Court at Abbottabad and given under our hands and the seal of the Tribunal on this 22<sup>nd</sup> day of September, 2022.

KALIM ARSHAD KHAN Chairman Camp court Abbottabad

Member (Executive) Camp court Abbottabad

#### <u>ORDER</u>

22 Sept, 2022

1. Learned counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for respondents present.

2. Vide our detailed judgement of today placed on file (containing 03 pages), we see no merit in this appeal. This appeal is thus dismissed. Costs shall follow the event. Consign.

3. Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 22<sup>nd</sup> day of Sept, 2022.

(Kalim Arshad Khan) Chairman Camp Court Abbottabad

eeha Paul)

(Fareena Faul) Member(Executive) Camp Court Abbottabad

Service Appeal No 4277/2021 titled "Riasat Khan-vs-Govt: of Khyber Pakhtinkhwa through Chief Secretary-Khyber Pakhtinkhwa Peshawar and others", decided on 22,09,2022 by Division Bench comprising Kalim Arshad Khan, Charman, and Farçeha Paul, Member, Executive, Khyber Pakhtinkhwa Service Tributal. Comp Court Abbottibad.

#### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWA<u>R CAMP COURT ABBOTTABAD.</u>

#### BEFORE:

#### KALIM ARSHAD KHAN ... CHAIRMAN FAREEHA PAUL ... MEMBER (Executive)

#### Service Appeal No:4277/2021

**Riasat Khan S**/o Abdul Qayyum Khan Lecturer in Computer Science Govt: Post Graduate College No.1, Abbottabad.

......(Appellant)

#### <u>Versus</u>

- 1. Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2. Secretary Higher Education Khyber Pakhtunkhwa Peshawar.
- 3. Director Higher Education Peshawar.
- 4. Principal Govt: Post Graduate College No.1, Abbottabad.
  - (**Respondents**)

Present:

Mr. Muhammad Arshad Khan Tanoli, Advocate......For appellant.

Muhammad Jan, District Attorney......For respondents.

. ....

Date of Institution	30.03.2021
Dates of Hearing	22.09.2022
Date of Decision	

APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT HAS BEEN REMOVED FROM SERVICE VIDE REMOVAL FROM SERVICE ORDER NO.SO(COLLEGES)/09-2010/X1-8/2006 DATED 26.07.2010 WHICH IS PERVERSE, DISCRIMINATORY AND THE SAME IS LIABLE TO BE SET-ASIDE.

#### JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN .: The brief facts of the case are

that the appellant was appointed as Lecturer in Computer Science in Govi.

Post Graduate College No.1 Abbottabad vide appointment order dated

#### LIST OF SB CASES FIXED BEFORE MR. KALIM ARSHAD KHAN CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD.

#### 22/09/2022. (THURSDAY)

#### PRELIMINARY HEARING .

S.NO	APPEAL	APPELLANT NAME	DEPTT	NEXT DATE
1.	1069/22	M RASHEED	ESTB	
2.	618/22	SHER BAHADAR (1)	EDU	· · · · ·
3.	897/22	M WASEEM	IRRI	
4.	888/22	ZAHOOR KHAN	EDU	
5.	3185/20	M SHABBIR	SMBR	
6.	8815/20	SONIA BIBI	EDU	
7.	5680/20	SAIMA NOREEN	EDU	
8.	7823/21	KAUSAR JEHAN	EDU	
9.	1336/22	ZAHID ULLAH	PHE	
10.	1340/22	M WAQAS	EDU	1

#### EXECUTION PETITION.

S.NO	E/P/NO	APPELLANT NAME	DEPTT	NEXT DATE
1	518/22	ABDULLAH JAVED	EDU	
2	96/20	WAJID KHAN	EDU	
3	348/21	M SALEEM	POLICE	
4	388/22	M REHMAN	SMBR	
5				

#### REPLY.

S.NO	APPEAL	APPELLANT NAME	DEPTT	NEXT DATE
1.	1416/21	FAISAL HAFEEZ	POLICE	
2.	16441/20	KHATIB UN NISA	EDU	
3.	4516/21	SHUMAILA RAFIQ `	EDU	
4.	114/22	ATTA ULLAH	EDU	
5.	1348/19	HAIDAR ALI SHAH	EDU	
6.	622/22	GHULAM MUSTAFA	FOREST	
7				

READER

#### LIST OF SB CASES FIXED BEFORE MR. KALIM ARSHAD KHAN CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD

#### 19/09/2022. (MONDAY)

#### PRELIMINARY HEARING .

S.NO	APPEAL	APPELLANT NAME	DEPTT	NEXT DATE
1.	12445/21	AKMAL HUSSAIN	ÊDU	· · ·
2.	5902/21	M FAROOQ (7)	INDU	
3.	927/22	SHAHFIQUE	PHE	
4.	929/22	ISHTIAQ AHAMAD	POLICE	
5.	1194/22	M JAVED &01	POLICE	
6.	1338/22	MUZFFAR IQBAL (1)	FISHERY	
7.	1117/22	SANAM NAZ	POILCE	
8.	1118/22	SAIRA BANO	EDU	
9.	1136/22	FAISAL SHAHAZAD	СОММ	
10.	1182/22	WAQSEEMA JABEEN	EDU	
11.				

#### **EXECUTION PETITION.**

S.NO	E/P/NO	APPELLANT NAME	DEPTT	NEXT DATE
1.	106/20	M SAJID	POPU	
2.	116/20	FARHAD SAJID	FOREST	2
3.	344/22	BILAL RAZA	JUDICIARY	
4.	547/22	ABDUL JAMIL	EDU	
5.	546/22	SHAKEEL AKHTAR	EDU	
6.	522/22	M NOOR	EDU	
7.				

#### REPLY.

·\*

S.NO	APPEAL	APPELLANT NAME	DEPTT	NEXT DATE
1.	941/22	SAQIB ALI	POLICE	
2.	992/22	GUL AFAZAL	POLICE	
3.	2559/21	RAJA RABNAWAZ	EDU	
4.	7864/21	MSHRAF JAMAL	FOOD	· .
5.	7906/21	HABIB UR REHMAN	JUDICIARY	
6.	7907/21	IMTIAZ HUSSAIN	JUDICIARY	
7	11148/21	SADAQAT KHAN	EDU	
8.	9269/20	FARHAT JABEEN	. EDU	
9.	11882/20	MOHAMMAD ZAFFAR	EDU	
10.				

READER

21<sup>th</sup> July 2022

S. Same

Counsel for the appellant present. Kabiruallah Khttak, Addl: AG and Mr. Noor Zaman Khattak, District Attorney alongwith Prof: Muhammad Shakeel, Litigation Officer for respondents present.

Written reply/comments alongwith cost of Rs. 5000/- has been submitted by the respondents. A copy of written reply/comments is handed over to the learned counsel for the appellant. Adjourned. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.

(Salah Ud Din) Member (Judicial)

(Kalim Arshad Khan) Chairman Camp Court Abbottabad 16.05.2022

None present for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney along with Prof. Muhammad Shakeel, Litigation Officer for the respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of the respondents sought time to submit the same on the next date. Last opportunity is granted. To come for written reply/comments before S.B at camp court Abbottabad on 18.07.2022.

### Fareena Paul Member (E) Camp Court, Abbottabad

18.07.2022

his counsel present. Professor alongwith Appellant Muhammad Shakeel, Litigation Officer alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents submission of for present and again sought time reply/comments. Last opportunity granted subject to payment of cost of Rs.  $5000/\frac{1}{1}$ , failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for submission of reply/comments as well as arguments on 21.07.2022 @before the D.B at Camp Court Abbottabad.

(Salah-Ud-Din) Member (J) Camp Court Abbottabad 11.10.2021

. . . .

C.

Clerk of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is unable to appear before the Tribunal today due to strike of lawyers. Adjourned. To come up for preliminary hearing before the S.B on 28.12.2021 at Camp Court Abbottabad.

> (SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT ABBOTTABAD

28.12.2021

Ac Burch de

Appellant present in person. Preliminary arguments have been heard.

South a state of the appellant has invoked the jurisdiction of this Tribunal against his removal from service vide order dated 26.07.2010, which has been annexed with the memorandum of appeal. Copy of the said order on its face does not disclose as to nature of the disciplinary proceedings required to be taken before issuing of the impugned order of removal from service. Let the respondents come up and submitted their written reply. Subject to all just and legal objections including limitation, this appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 14.03.2022 before S.B at camp court, Abbottabad.

Camp Court, A/Abad

AppdNant Deposited د Process Fee

#### Form- A

#### FORM OF ORDER SHEET

Court of

4277/**2021** Case No.-Order or other proceedings with signature of judge S.No. Date of order proceedings 2 3 1 The appeal of Mr. Riasat Khan presented today by Mr. Muhammad 30/03/2021 1-Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR This case is entrusted to S. Bench for preliminary hearing to be put 2up there on 16-7-21. Notices be issued to appellant/counsel for the dute Fixed 3-6-21 СНАЙ 16.07.2021 This case belongs to the Hazara Division and such cases were previously heard at camp Court, Abbottabad. May be notices issued to appellant/counsel have not been received by them, therefore, they are not in attendance. Fresh notices be issued to appellant/counsel for preliminary hearing on 11.10.2021 at camp court, Abbottabad.

## BEFORE THE CHAIRMAN SERVICE TRIBUNAL KPK. PESHAWAR.

Riasat Khan

...APPELLANT

#### VERSUS

Govt. of KPK through Chief Secretary KP Peshawar and others

...RESPONDENTS

#### SERVICE APPEAL

#### **INDEX**

S.No.	Description of Document	Annexure	Page No.
1.	Service Appeal alongwith Verification, affidavit		1-8
2.	Copy of the appointment order of the appellant	"A"	9-11
3.	copy of letter No.2453 dated 15.08.2007, 15961 dated 31.08.2007, endorsement No.17882 dated 27.09.2007, endorsement No.2921 dated 21.02.2008, No.3071 dated 05.03.2008 No.6111 dated 02.04.2008	"B"	12-17
4.	Copy of application dated 18.10.2020	"C"	18-20
5.	Copy of departmental appeal	"D"	21
6.	Wakalat Nama		

PELLANT

Through:

Dated:-26 \_/2021

AD KHAN TANOLI) (MUHAN Advocate High Court, Abbottabad

## BEFORE THE CHAIRMAN SERVICE TRIBUNAL KP 4277/20 4277/20

Riasat Khan S/o Abdul Qayyum Khan Lecturer in Computer Science Govt. Post Graduate College No.1, Abbottabad.

.APPELLANT

428

hyber Pakhtukhw

Dated

## VERSUS

- 1. Govt. of KPK through Chief Secretary KP Peshawar.
- 2. Secretary High Education KP Peshawar.
- 3. Director Higher Education Peshawar.
- 4. Principal Govt. Post Graduate College No.1, Abbottabad.

#### ...RESPONDENTS

#### SERVICE APPEAL

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SERVICE APPEAL U/S 4 OF KP SERVICE TRIBUNAL ACT 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT HAS BEEN REMOVED FROM SERVICE VIDE REMOVAL FROM SERVICE ORDER NO.SO(COLLEGES)/09-2010/XI-8/2006 DATED 26.07.2010 WHICH. IS PERVERSE, DISCRIMINATORY AND THE SAME IS LIABLE TO BE SET-ASIDE. PRAYER:-

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED REMOVAL FROM SERVICE ORDER NO.SO(COLLEGES)/09-DATED 26.07.2010 2010/XI-8/2006 MAY GRACIOUSLY BE ORDERED TO BE SET-ASIDE AND RESPONDENT DEPARTMENT MAY BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE W.E.F THE DATE OF HIS REMOVAL I.E. 26-07-2010 WITH ALL SERVICE BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE DEEM APPROPRIATE COURT IN THE CIRCUMSTANCE OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth,

The facts forming the background of the instant service appeal are arrayed as under:

1.

That, the appellant got appointment as Lecturer in Computer Science in Govt. Post Graduate College No.1 Abbottabad vide appointment order No.SO(COLLEGES)2-5/2020 dated 01.08.2002. (Copy of the appointment order of the appellant is attached as Annexure "A")

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2.

3.

4.

That, thereafter, the appellant serve the department with zeal and zest and left no stone unturned in the smooth functioning to the entire satisfaction of his superior authorities. Besides, the appellant earned outstanding ACRs during the period of his service as lecturer.

That, the appellant applied for Ex-Pakistan leave for two years and his application for ex-Pakistani leave was dully processed by the respondents but the said leave was not dully sanctioned in this regard, copy of letter No.2453 dated 15.08.2007 15961 dated 31.08.2007, No.17882 endorsement dated 27.09.2007, endorsement No.2921 dated 21.02.2008, No.3071 dated 05.03.2008 No.6111 dated 02.04.2008 are attached as Annexure "B")

That, the appellant without getting Ex-Pakistan leave sanctioned, went abroad and during his absence period he has been removed from service vide order No.SO(Colleges)/09-2010/XI-8/2006 dated 26.07.2010.

That, the appellant after reaching Pakistan, applied to the respondents No.2 & 3 for joining his service through representation dated 18<sup>th</sup> November 2020. (Copy of application dated 18.10.2020 is attached as Annexure "C")

That, following this, respondent department provided copy of impugned removal from service order No.SO(Colleges)/09-2010/XI-8/2006 dated 26.07.2010 on 25.11.2020. As a result, the appellant filed departmental appeal on 18.12.2020 against the impugned removal from service order dated 26.07.2010. (Copy of departmental appeal is annexed as Annexure "D")

That, respondent department did not bother to decide departmental appeal so far. Hence, the instant service appeal is filed inter-alia on the following grounds:

5.

6.

7.

#### <u>GROUNDS:-</u>

a)

b)

That, impugned removal from service order dated 26.07.2010 is illegal, perverse, discriminatory, arbitrary and one sided. The same is liable to be set-aside.

That respondent department did not follow the prescribed procedure which is sine qua non for removal from service. The respondent department was supposed to conduct proper inquiry prior to the issuance of impugned removal from service order.

c) That the appellant has not been provided statement of allegations, show cause notice and opportunity of personal hearing. Resultantly ex-parte proceedings in the absence of the appellant were carried out and lastly the appellant has been removed from service vide removal from service order dated 26.07.2010. That it has now been settled by the superior Courts and so many judgments that no employee can be removed from service until or unless opportunity of personal hearing as well as defending his case is provided. The removal from service order dated 26.07.2010 is a result of audi altrum partum and not maintainable at law.

- 6 -

d)

e)

1

That when law prescribe a thing which is to be done in a particular manner that must be done in that manner and not otherwise. Valuable rights of service of the appellant are involved therefore respondent department was supposed to follow the codal formalities for proceeding against the appellant. Therefore on this score, impugned removal from service dated 26.07.2010 is liable to be cancelled.

That the matter relates to the terms and conditions of service, therefore, this Hon'ble tribunal has jurisdiction to entertain of the appellant under Article 212 of the Constitution of Islamic Republic of Pakistan 1973.

f)

**PRAYER:** 

It is prayed that on acceptance of the instant service appeal, impugned removal from service order No.SO(COLLEGES)/09-2010/XI-8/2006 dated 26.07.2010 may graciously be ordered to be set-aside and respondent department may be directed to reinstate the appellant in service w.e.f the date of his removal i.e 26-07-2010 with all service back benefits. Any other relief which this Honourable tribunal deem appropriate in the circumstance of the case may also be granted to the appellant.

**APPELLANT** 

Through:

Dated:-26/2\_/2021

RSHAD KHAN TANOLI) animad -Advocate High Court, Abbottabad

#### **VERIFICATION:-**

Verified that the contents of the instant **Service Appeal** are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:-26/3\_/2021

LANT

## BEFORE THE CHAIRMAN SERVICE TRIBUNAL KP PESHAWAR.

Riasat Khan

...APPELLANT

#### VERSUS

Govt. of KPK through Chief Secretary KP Peshawar and others

...RESPONDENTS

#### SERVICE APPEAL

#### **AFFIDAVIT**

I, Riasat Khan S/o Abdul Qayyum Khan Lecturer in Computer Science Govt. Post Graduate College No.1, Abbottabad, Appellant, do hereby solemnly affirm and declare on Oath that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:-26/3 /2021

APPELLANT



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GOVERNMENT OF NWFP THEHER EDUCATION DEPARTMENT

Dated Peshawar 1/8/2002,

Annex A.

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## NOTIFICATION.

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# NO.SO(COLLEGES)2-5/2002. Consequent upon the recommendation of NWFP Public . Service Commission, the Competent Authority is pleased to appoint the following candidates as lecturers, (Male) (B-17) on contract and post-specific basis in various subjects in relaxation of ban, in Government Colleges, mentioned against each, read with the adjustment at S.No.31, from the date of taking over charge:-

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		1	•	
	S.No.	Name	· · · · · · · · · · · · · · · · · · ·	•
	ł	Hafiz Sayed Zarwali Shah, S/O Sayed	Place of Posting.	
		Waheed Gul, Vili: & P.O. Tordher, Moh.	Lecturer in Zoology	
1	-	Miangan, Tchsil Labor District Swabi.	. GC, Kotha Swabi.	Allosled
	2	Qadeem Khan S/O Bakht Zamin Gul, Vill:		Allaster
	•	& P.O. Box. Ghani Dheri, Tehsil Dargai	Lecturer in Zoology	
	•	Malakand Agency.	GC, Thana Mkd.	I ANNOLA
• •	3	Humayon Khan Stores	Agency.	Mut all
1	: .	Humayun Khan, S/O Falak Naz Khan, Vill: Gundaly P.O. Bayar Alma Mill	Lecturer in Zoology	Muhamimaa Arshaw
	•	Gundaly P.O. Bazar Ahmad Khan Tehsil & District Bannu.	GC, Ahmad Abad	Advocate High C.
	. 4	Ubaid Lillah SiQ Mark	.Karak.	Drice No 33 Adjar
		Ubaid Ullah S/O Muhammad Umar, Vill:	Lecturer in Zoology	Disit Pr Abnottat
ł		Ahmad Shah, Shaikhan P.O. Shahjehan Shah Tehsil & District Bannu.	GC, Sabir Abad Karak.	The C
ľ	5	Ali Bahadar Sto M		1. '
}		Ali Bahadar S/O Nawab Gul, District &	Lecturer in Zoology	
		Tehsil Mardan, P.O. Gaudar, Village	GSSC, Peshawar.	
	6			
i		Hizbur Rehman, S/O Wali Ullah, Vill: Piai Daggar District Bunir.	Lecturer in Zoology	
	7	Wigar Aband Stored	GC, Puran Swat.	
ļ		Wigar Ahmad S/O Muhammad Igbal, Estoz Abad, Dalam I, D	Lecturer in Zoology	- · ·
	<u>S</u> .	Feroz Abad, Dalazak Road Peshawar City.	GC, Agra Swat	
Ì	~~~	Sultan-ud-Din S/O Fath-ur-Rahim, Vill: &	Lecturer in Zoology,	
ĺ	.0	P.O. Warsak Chadara, District Dir(Lower).	GC, Chitral	
		Rahmatullah Khan, S/O Rehmat Khan, R/O Ghari Sher Ahmad Kotka Rahmat Khan	Lecturer in Zoolouv	
		P.O. GPO Tehsil & District Bannu.	GC, Battagram	
	10	Jabbar Khan, S/O Sher Wali Khan, Vill:		
		Mauladad, P.O. Manuash Khel District &	Lecturer in Zoology,	
		Tehsil Bannu.	GPGC Kohat	•
	11	Akbar Ali, S/O Izat Khan, ZAM, Public		ĺ
	• •	School Tank Political Agent Compound	Lecturer in Zoology,	
			GC, Laddha S W	] :
1	12	Tahir Sarfaraz S/O Sarfaraz Kilan, Tehir	Agedgy	· · ·
	Ŧ	Sarfara P.O. Box.No.83 GPO Abhottabad.	Lecturer in Zoology,	
-			GUrtavelian	· ·
	13	Mobammad Yasar Arafat S/O Abdul	Abboitabad.	•
		Marine, C/O Samawal Hallos Tobeli e D /	Lecturer in Computer	
			-Science, GC, Maita	· · · · · · · · · · · · · · · · · · ·
	14	Schat Ullah, S/O Muhammad Mill.	Sival.	
		Chamartali, P.O. & Tehsil Samar Bagh Dir	Lecturer in Computer	
	·	Teoner).	Science, GC, Babuzai	•
	15	Said Ahmad S/O Abdul Hakim	Mardan.	
		District Mardan Tensil Takht Bhai, P.O.	octurer in Computer	· · · ·
L			Science, GC K di sher	
_		the outiny Shah.	Linuer Khyber Agency.	
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Muhamindu Arshad Khali Advocate High Court Office No 33 Adjacent to Distt 3:r Abbettabad

<ul> <li>16 Irfanul Haq S/O Muhaonnad Massoon, C/O Takrim-ul-Haq Book Seller Bazar Mina Ehef, P.O. &amp; District Lakki Marwat.</li> <li>17 Raza Bakhsh, S/O Haji Abdur Rashid Awan(Late) Street No. 7 Near Baihul Suhan Hussain Abad Culon: Peshawar.</li> <li>18 Nianat Ullah S/O Aluhammad Dawran, Uill: Sapal Bandi, P.O. Saidu Sharif Swat.</li> <li>19 Jehangir Khan S/O Al Mas Kilan, Vill: &amp; P.O. Taru Jabbr District &amp; Tehsil.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill: Amakot P.O. Bax, Pabbi , Tehsil &amp; District Nowshera.</li> <li>21 Riasat Khan S/O Aluhammad Ashraf, Paracha Town Rawinghind Road, Kohat, Coondakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Ashraf, S/O Abdul Qadir, Vill: Amawad Ashraf, Panacha Town Rawinghindi Road Kohat, Panacha Town Rawinghindi Road Kohat, Panacha Town Rawinghindi Road Kohat, Baharyu Distriet D.J.Khan, Colony Haripur Hazara.</li> <li>23 Shamsul Quyum, S/J Abdul Qadir, Vill: Baharyu Distriet D.J.Khan, Colony Haripur Hazara.</li> <li>24 Mohammad Eaud S/O Mohammad Miskeen, H.N.3.81-A/5 TIP Housing Colony Haripur Hazara.</li> <li>25 Rehman Wali S/O Neor-ur-Rehman, Vill: Bahard Olta D.O. Shukat Tehsil, Wahammad Bahir S/O Kabada Khan, Colony Haripur Hazara.</li> <li>26 Abdul Wahab S/O Abdul Satur, Vill: Bahargur Distriet D.J.Khan, Will: Khatki Sharif Michan Vill: Bahargur Jakira S/O Kabada Khan, Will: Khatki Sharif Michan Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bahir S/O Razdar Ali, Vill: Jamra P.O. SNC Takht Bhai Mardan, Will: Khatki Sharif Michan) Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>29 Mohammad Saloh S/O Mubhammad Zakir Khan, C/O Abdul Manager Allied' Baha, C/O Abdul Manager Allied' Baha, C/O Abdul Mada Manager Allied' Baha, C/O Abdul Mada Manager Allied' Baha, C/O Abdul Mada Manager Allied' Baha, C/O Hazaa Ali Shopke,per.</li> <li>29 Mohammad S/O Mumitaz Mohammad Rod Mardan, C/O Hazaa Ali Shopke,per.</li> </ul>	·	<u> </u>	
<ul> <li>Lief, P.O. &amp; District Lakki Marwat, Raza Bakhsh, S/O Haji Abdur Rashid Awan(Late) Street No. 7 Near Bainti Sufau Hussain Abad Colour: Peshawar.</li> <li>Niamat Ullah S/O Muhammad Dawran, Vill: Sapal Bandi, P.O. Saidur Sharif Swat, Vill: Sapal Bandi, P.O. Saidur Sharif Swat, Vill: Sapal Bandi, P.O. Saidur Sharif Swat, Niamat Ullah S/O Al Nes Kilan, Vill: &amp; P.O. Taru Jabba District &amp; Tehsil, Nowshera,</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box, Pabbi, Tehsil &amp; District Nowshera,</li> <li>Riasat-Khan S/O Aldui Qayyum KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>Jawad Ashraf, S/O Aldui Qayyum KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>Jawad Ashraf, S/O Aldui Qayyum KFan, Co Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>Jawad Ashraf, S/O Aldui Qayyum KFan, Co Mahammad Sof Abdul Qadir, Vill: &amp; P.O. Wanda Lolmai, (Euthi Khel) Tehsil &amp; P.O. Wanda Lolmai, (Euthi Khel) Tehsil &amp; P.O. Wanda Lolmai, (Euthi Khel) Tehsil Science, GPGC, Mainar Miskeen, H.N.S.381-A/S TIP Housing Colony Haripur Lizara.</li> <li>Rehman Wali S/O Abdul Satter, Vill: Bitand Qilla P.O. Sabit Abad Tehsil Karak, Colóny Teshil &amp; Disfriet Peshawar.</li> <li>Mohammad Bashir G/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colóny Teshil &amp; Disfriet Peshawar.</li> <li>Mohammad Bashir G/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colóny Teshil &amp; Disfriet Peshawar.</li> <li>Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Wadu Manager Alliedf Distriet Svabi.</li> <li>Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Wadu Manager Alliedf Distriet Svabi.</li> <li>Ayaz Ahmad S/O Mumtaz Mohammad, Khan, C/O Abdul Wadu Manager Alliedf Distriet Svabi.</li> <li>Ayaz Ahmad S/O Mumtaz Mohammad, Khan, C/O Abdul Wadu Manager Alliedf Balawat Colony rear Malkand Bypass</li> <li>Mohammad Sideh S/O Mumtaz Mohammad, Balawat Colony rear Malkand Bypass<!--</th--><th>16</th><th>Irfanul Hag S/O Muhammad Masaran C/O</th><th></th></li></ul>	16	Irfanul Hag S/O Muhammad Masaran C/O	
<ul> <li>File, F.O. &amp; Dichee Lakki Marwat.</li> <li>I. Raza Bakhsh, S/O Haji Abdur Rashid AwanQLateQ Street No.7 Near Baitut Sultar Hussain Abad Coleay Peshawar.</li> <li>Nianiat Ullah S/O Atuhammad Dawran, Vill: Sapal Bandi P.O. Saidur Sharif Swat.</li> <li>Nianiat Ullah S/O Atuhammad Dawran, Vill: Sapal Bandi P.O. Saidur Sharif Swat.</li> <li>Science, GPGC, Abbottabad.</li> <li>Jettangir Kiran S/O Al N &amp; Kiran, Vill: &amp; P.O. Taro Jabba District &amp; Tehsil.</li> <li>Nówshera,</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box, Pabbi , Tehsil &amp; District Nowshera.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box, Pabbi , Tehsil &amp; District Nowshera.</li> <li>I. Riasat Khan S/O Abdul Qayum KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad:</li> <li>Jawad Ashraf, S/O Kinammad Ashraf, Paracha Town Raw-tpindi Road Kohat.</li> <li>Selonce, GPGC, Mohalm Miskeen, H.N.S.SL-A/S TIP Housing Colony Haripur Uscara.</li> <li>Rehman Wali S/O Norr-ur-Rehman, Vill: Biland Qilla P.O. Shir Abad Tehsil Karak.</li> <li>Rehman Wali S/O Kohat Tehsil Karak.</li> <li>Rohnam Wali S/O Kohat Statu Yill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>Khatki Sharif G/C Khandan Khan, Vill: Khatki Sharif G/C Khandan Khan, Vill: Khathi Sharif G/C Khandan Khan, Vill: Khathi Sharif G/</li></ul>		Takrim-ul-Hay Book Softer Rame Min	Lecturer ni Computer
<ul> <li>4 Adda Gakhsh, S/O Haji Abdur Rashid Awan(Late) Street No. 7 Near Brinn Suffau Hussain Abal Coher, Peshawar.</li> <li>18 Niamat Ullah S/O Al Mammad Davran, Vill: Sapat Bandi, P.O. Saidu Sharif Swat.</li> <li>19 Jehangir Khan S/O Al Nas Khan, Vill: &amp; P.O. Taru Jabb District &amp; Tehsil.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Baw, Pabbi , Tehsil &amp; District Nowshera.</li> <li>21 Riasat Khan S/O Al Mas Khan, Vill: &amp; District Nowshera.</li> <li>21 Riasat Khan S/O Al Mageed, Vill: Amankot P.O. Baw, Pabbi , Tehsil &amp; District Nowshera.</li> <li>21 Riasat Khan S/O Abdu Qayunn Khan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abhottabad.</li> <li>22 Jawad Ashari, S/O Abdu Qadir, Vill: &amp; P.O. Wanda Lohani, (Kuthi Khel) Tehsil &amp; Paracha Town Raw-pinki Road Kohat.</li> <li>23 Shamsal Quyun, S/O Abdu Qadir, Vill: &amp; P.O. Wanda Lohani, (Kuthi Khel) Tehsil &amp; District D.J.Khan.</li> <li>24 Mohammad Daud S/O Mohammad Miskeen, H.N.3.SH-A/S TIP Housing Colony Haripur District D.J.Khan.</li> <li>25 Rehman Wali S/O Nor-ur-Rehman, Vill: Biland Qilla P.O. Sabin Abad Tehsil Karak. Colony Teshif &amp; O. Shan Abad Tehsil Abdul Waliab S/O Khandar, Vill: Biland Qilla P.O. Sabin Abad Tehsil Karak. Colony Teshif &amp; O. Sharar Tehsil Ladar Vill: Khatki Sharif(Michni) via Warsak Colony Teshif &amp; Dax Bazar Tehsil Ladar Vill: Khatki Sharif(Michni) via Warsak Colony Teshif &amp; Disfriet Peshawar.</li> <li>28 Mohammad Sayar S/O Mazar Ali, Vill: Tamu Dheri P.O. Box. Bazar Tehsil Ladar District Swabi.</li> <li>29 Mohammad Saleh S/O Mohammad Zakir Khan, C/O Abdul Wadud Manager Allicut' Bank Chirral.</li> <li>20 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Rypass Bayai Mardan. C/O Linga At the Alli Charamad, R/O Bajaur Colony near Malakand Rypass</li> </ul>		Thel, P.O. & District Latter Mazar Millio	Science, GC, Tajori
<ul> <li>Awan(Late) Street No.7 Near Baitut Suhau Hussain Abad Colour Peshawar.</li> <li>Niariat Ullah S/O Kuhammad Dawran, Vill: Sapal Bandi P.O. Saidur Shatif Swat.</li> <li>Science, GP(C, Abbutabad, Peshawar.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: &amp; Kohat.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: &amp; Ceturer in Computer Science, GP(C, Abbutabad, Peshawar.</li> <li>Riasat Khan S/O Abdid Qayyun KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbutabad.</li> <li>Insast Khan S/O Abdid Qayyun KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbutabad.</li> <li>Jawad Ashraf, S/O Abdid Qayyun KFan, C/O Mohammad Jan(Shopkeeper) Vill: Science, GPGC, Abbottabad.</li> <li>Jawad Ashraf, S/O Abdud Qadir, Vill &amp; Science, GP, Peabbi I Science, GP(C, Peabbi I Pahapur District D1, Khan.</li> <li>Mohammad Daud S/O Mohammad Ashraf, Paracha Town Rawaphindi Road Kohat.</li> <li>Science, GP, Peabbi I, Science, GP, Peabbi I, Bahapur District D1, Khan.</li> <li>Mohammad Daud S/O Mohammad Ashraf, Biland Qilla P.O, Sabi Abad Tehsil Karak, GPGC, Haripur, Science, GPGC, Mansebra.</li> <li>Rehman Wali S/O Abdul Sattar, Vill: Biland Qilla P.O, Sabi Abad Tehsil Karak, GP, C, Haripur, Lecturer in Geography, GC, Khanpur, Vill: Khatki Sharif(Micini) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Balakot</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Balakot</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Balakot</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Chitral.</li> <li>Mohammad Sayar S/O Mohammad, Kitar, Vill: Matha Shathaf Colona Matabad Si Khang Colony near Malakam Bypass</li> <td>17</td><td>Raza Bakhsh S/O (Jai) Ab har</td><td></td></ul>	17	Raza Bakhsh S/O (Jai) Ab har	
<ul> <li>Itussain Abad Colong Peshawar.</li> <li>Niainat Ullah S/O Kuhammad Dawran.</li> <li>Vill: Sapal Baidi P.O. Saidu Sharif Swat.</li> <li>Iecturer in Computer Science, GPGC, Abbottabad.</li> <li>D. Taro Jabba District &amp; Tehsil.</li> <li>Nowshera.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Achat.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box. Pabli , Tehsil &amp; Lecturer in Computer Science, GPC, K.D.A.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box. Pabli , Tehsil &amp; Lecturer in Computer Science, GPC, R.D.A.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box. Pabli , Tehsil &amp; Computer Science, GPC, Pabbi.</li> <li>V 21. Riasat-Khan S/O Abdii Qayyun KPan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22. Jawad Ashraf, S/O Aidiai Qayyun KPan, Paracha Town Row Ipinal Road Kohat.</li> <li>23. Shamsal Quyum, S/O Abdul Qadir, Vill &amp; Lecturer in Computer Science, GPGC, Preitat Paracha Town Row Ipinal Road Kohat.</li> <li>24. Mohammad Daud S/O Mohammad Miskeen, H.N.S.81-A/S TIP Housing Colony Haripur Liteara.</li> <li>25. Rehman Wali S/O Nor-ur-Rehman, Vill: Biland Qilla P.O. Shef Takih Khan, Co Kudu Walis M. Mardan.</li> <li>26. Abdul Walisb S/O Abdul Satter, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27. Mohammad Bashi: S/O Khandan Khan, Vill: Khatki Sharif Michin) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>28. Mohammad Sayar S/O Razdar Ali, Vill: Tawn Dheri P.O. Box. Bazar Tehsil Lahr District P.O. Abdul Manager Alliedf GC, Balakot, Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Balakot, Non-Mishan C/O Mohammad Zakir Khan, C/O Abdul Manager Alliedf Band, GC, Chitral, Bank Chitral.</li> <li>30. Ayaz Ahmad S/O Mumtaz Mohammad, Roban, C/O Mohammad Calle Mana Markan Bypass</li> </ul>		Awan() ato) Stear Ma 7 Store N	Lecturer in Computer:
<ul> <li>Niamat Hah S/O Muhammad Dawran, Vill: Sapal Bandi P.O. Saidt Sharif Swat.</li> <li>Science, GPGG, Abbutabad.</li> <li>Jehangir Kian S/O Al Nas Kian, Vill: &amp; P.O. Taru Jabba District &amp; Tehsil.</li> <li>Nöwshera.</li> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box. Pabli , Tehsil &amp; District Nowshera.</li> <li>Riasat Khan S/O Abdui Qayyun Khan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>Riasat Khan S/O Abdui Qayyun Khan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>Jawad Ashraf, S/O Mohammad Ashraf, Paracha Toyut Rawapineti Road Kohat.</li> <li>Shamsal Qayaun, S*J Abdul Qadir, Vill Bahapur District D.J.Khan.</li> <li>Mohammad Daud S*O Mohammad Miskeen, H.N.S.81-A/S TIP Housing Colony Haripur Ligara.</li> <li>Kehman Wali S/O Abdul Statu Statu, Vill: Biland Qilla P.O. Sheh Alaraf.</li> <li>Colony Haripur Ligara.</li> <li>Abdul Wahab S/O Abdul Statu Statu, Vill: Biland Qilla P.O. Sheh Mahardan.</li> <li>Colony Teshi &amp; Statu Statu Statu Statu Statu Vill: Khaki Sharif (Michni) via Warsak Colony Teshi &amp; Disfrict Peshawar.</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Bank Chitrat.</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Taw Dheri P.O. Box. Bazar Tehsil Lahar District Svabi.</li> <li>Abdul Wahad S/O Michammad Zakir Khan, C/O Abdul Manager Allied?</li> <li>Ge, Rahapur.</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Bank Chitrat.</li> <li>Ayaz Ahmad S/O Michammad Zakir Khan, C/O Abdul Manager Allied?</li> <li>Ayaz Ahmad S/O Michammad Zakir Khan, C/O Abdul Manager Allied?</li> <li>Kathan Co Michammad Zakir Khan, C/O Abdul Manager Allied?</li> <li>Kathan Co Michammad Zakir Khan, C/O Abdul Manager Allied?</li> <li>Kathan Co Michammad Zakir Khan, C/O Abdul Manager Allied?</li> <li>Kathan Chitrat.</li> </ul>		Insenio Abole 2017 10 1 Near Bartal Sultan	j Science, GC, Mathra
<ul> <li>VIII. Sapal Bandi, P.O. Saidir Sharif Swat.</li> <li>Science, GPGC, Abbottabad.</li> <li>P.O. Taru Jabba' District &amp; Tehsil.</li> <li>Niiwshera.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill: &amp; Kohat.</li> <li>21 Riasat-Khan S/O Abdii Qayum KPan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil &amp; District Nowshera.</li> <li>22 Jawad Ashraf, S/O Abdii Qayum KPan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Ashraf, S/O Mehammad Ashraf, Paracha Town Raw Ipindi Road Kohat.</li> <li>23 Shamaal Quyuum, S20 Abdul Qadir, Vill &amp; Lecturer in Computer Science, GPGC, Pabbi District D.J.Khan.</li> <li>24 Mohammad Daud S40 Mohammad Miskeen, H.N.3.81-A/3 TIP Housing Colony Haripur Hazara.</li> <li>25 Rehman Wali S/O Mor-ur-Rehman, Vill: Biland Qilla P.O. Sabi Abad Tehsil Karak.</li> <li>26 Abdul Waliab S/O Abdul Qadar, Vill: Lecturer in Electronics, GPGC, Haripur, Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bashi: G/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Ralakot</li> <li>29 Mohammad Sayar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Svabi.</li> <li>29 Mohammad S/O Mumtaz Mohammad Zakir Khan, C/O Abdul Walab S/O Moramad Zakir Khan, C/O Abdul Wadud Manager Allied?</li> <li>29 Mohammad S/O Mumtaz Mohammad Akir R/O Bajaur Colony new Malakand Bypass</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, Kuan Bypass</li> </ul>	115	Niohar tura excellent reshawar	Peshawar
<ul> <li>Jehangir Kitan S,O AL Nas Kitan, Vill: &amp; Science, GPGC, Abbottabad, Lecturer in Computer Nowshera.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill: Lecturer in Computer Science, GC, Pabbi, Tehsil &amp; District Nowshera.</li> <li>21 Riasat-Khan S/O Abdul Qayyum KPan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Ashraf, S/O Liehammad Ashraf, Paracha Town Raw Jaindi Road Kohat.</li> <li>23 Shamsal Qayyum, S/O Abdul Qadir, Vill keturer in Computer Science, GPGC, Pabbi, Tehsil &amp; Science, GPGC, Pabbi, Tehsil Abbottabad.</li> <li>23 Shamsal Qayyum, S/O Abdul Qadir, Vill keturer in Computer Science, GPGC, Painalar Davad Ashraf, S/O Mohammad Jand S/O Mohammad Jane, Fuendaria Road Kohat.</li> <li>23 Shamsal Qayyum, S/O Abdul Qadir, Vill keturer in Computer Science, GPGC, Painalar Dahapur District D.LKhan.</li> <li>24 Mohammad Daud S/O Mohammad Lecturer in Computer Science, GPGC. Painalar Dahapur District D.LKhan.</li> <li>25 Rehman Wali S/O Norr-ur-Rehmin, Vill: Lecturer in Computer Science, GPGC, Haripur, Jaima P.O. ShC Takht Bhai Mardan, GC, Peshawar, Vill: Khatki ShariffMicini) via Warsak Colony Teshil &amp; District Peshawar.</li> <li>28 Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Haipur, District Swabi, S/O Mohammad Zakir Khan, C/O Abdul Wadid Manager Allieff G, Chitral.</li> <li>29 Mohammad Sayar S/O Razdar Ali, Vill; Lecturer in Geography, GC, Balakot</li> <li>29 Mohammad Solo Mohammad Zakir Khan, C/O Abdul Wadud Manager Allieff G, Chitral.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, Robammad, R/O Bajaur Colony neur Malakand Bypass</li> <li>21 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony neur Malakand Bypass</li> </ul>	$\mathbf{V}$	Ville Sanat D. S. C. Kuhammad Dawran,	Lecturer in Computer
<ul> <li>16 Jehangir Kiran S(O AI N is Kiran, Vill; &amp; Abbottabal, P.O. Taro Jabba District &amp; Tehsil. Növshera.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill; Amarkot P.O. Box, Pabbi , Tehsil &amp; Science, GC, K.D.A.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill; Amarkot P.O. Box, Pabbi , Tehsil &amp; Lecturer in Computer Science, GC, Pabbi,</li> <li>21 Riasat-Khan S/O Abdul Qaynan KPan, C/O Mohammad Jan(Shopkeeper) Vill; Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad;</li> <li>22 Jawad Ashraf, S/O Eiohammad Ashraf, Paracha Town Eaw-Ipindi Road Kohat,</li> <li>23 Shamaul Quyum, S2) Abdul Qadir, Vill e&amp; P.O. Wanda Lohani, (Futhi Khel) Tehsit Paharpur District D.I.Khan,</li> <li>24 Mohammad Daud S/O Mohammad ; Miskeen, H.N.3,381-A/3 TIP Housing Colony Haripur Hazara,</li> <li>25 Rehman Wali S/O Norr-tr-Rehman, Vill; Biland Qilta P.O. Sabir Abad Tehsil Karak,</li> <li>26 Abdul Waliab S/O Abdul Satar, Vill; Jamra P.O. SNC Takht Bhai Mardan,</li> <li>27 Mohammad Bashir 3/O Khandan Khan, Vill; Khatki Sharif(Micini) via Warsak Colony Teshil &amp; Disfriet Peshawar,</li> <li>28 Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Walua Manager Allieff District Swabi,</li> <li>29 Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Walua Manager Allieff Bank Chitral,</li> <li>29 Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Walua Manager Allieff Bank Chitral,</li> <li>29 Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Walua Manager Allieff Bank Chitral,</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony neur Malakand Bypass</li> <li>29 Mohammad Sateh S/O Mohammad Zakir Khan, C/O Abdul Wadu Manager Allieff Bank Chitral,</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony neur Malakand Bypass</li> </ul>		Sin, Sapar Bandi, P.O. Saidu Sharif Swat,	Science, GPGC
<ul> <li>Arhangi Kran S.O. Al Nis Kiam, Vill: &amp; Lecturer in Computer Nowshera.</li> <li>20 Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box, Pabhi , Tehsil &amp; Lecturer in Computer Science, GC, R.D.A., Kohat, Amankot P.O. Box, Pabhi , Tehsil &amp; Lecturer in Computer Science, GC, Pabhi , Tehsil &amp; District Nowshera.</li> <li>21 Riasat-Khan S/O Abdul Qayyum KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Abbottabad.</li> <li>22 Jawad Asharaf, S/O Eichianniad Ashraf, Paracha Town Ramipindi Road Kohat.</li> <li>23 Shamsal Qayyum, S?O Abdul Qadir, Vill: Abbottabad.</li> <li>23 Shamsal Qayyum, S?O Abdul Qadir, Vill: Abbottabad.</li> <li>23 Shamsal Qayyum, S?O Abdul Qadir, Vill: Science, GPGC, Meinat Science, GPGC, Meinat Science, GPGC, Meinat Science, GPGC, Meinat Science, GPGC, Mana Daud Sr0 Mohammad , Lecturer in Computer Science, GPGC, Manashra, Biland Qilla P.O. Sabi Abad Tehsil Karak.</li> <li>24 Mohammad Daud Sr0 Mohammad , Lecturer in Electronics, Colony Haripur Lazara.</li> <li>25 Abdul Waliab S/O Abdul Sattar, Vill: Biland Qilla P.O. Sabi Abad Tehsil Karak.</li> <li>26 Abdul Waliab S/O Abdul Statar, Vill: Jamra P.O. SNC Takht Bhai Mardan, GC, Peshawar.</li> <li>27 Mohammad Sayar S/O Khandan Khan, Vill: Khatki Shariff Michini) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayar S/O Karadar Ali, Vill: Tanu Dheri P.O. Box, Bazar Tehsil Lahor District Swabi, Abad Tohsil Karak, R/O Abdul Wadud Manager Allielf Bank Chiral.</li> <li>29 Mohammad Sayar S/O Mohammad Zakir Khan, C/O Abdul Wadud Manager Allielf Bank Chiral.</li> <li>29 Mohammad Solo Mohammad Zakir Khan, C/O Abdul Wadud Manager Allielf Bank Chiral.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony neu Malkand Bypass</li> <li>Boad Mardan, C/O Mumtaz Mohammad, R/O Bajaur Colony neu Malkand Bypass</li> </ul>			Abbottabad
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<ul> <li>20 Mohammad Ayaz S/O Said Majeed, Vill: Amanket P.O. Box, Pabbi , Tehsil &amp; Lecturer in Computer Science, GC, Pabbi,</li> <li>21 Riasat Khan S/O Abdusi Qayyum KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Science, GPGC, Abbottabad.</li> <li>22 Jawad Ashraf, S/O Aidianmad Ashraf, Paracha Town Rawnpindi Road Kohat.</li> <li>23 Shamsal Qayyum, S22 Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Futhi Khel) Tehsil Paharpur District D.J.Khan.</li> <li>24 Mohammad Dand S/O Mohammad Miskeen, H.N.3.381-A/3 TIP Housing Colony Haripur Liazara.</li> <li>25 Rehman Wali S/O Nort-ur-Rehman, Vill: Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>26 Abdul Walab S/O Atdul Satar, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Sayar S/O Kandan Khan, Vill: Khatki Sharif/Micini) via Warsak Colöny Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayar S/O Kandan Khan, Vill: Khatki Sharif Michini) via Warsak Colöny Teshil &amp; Disfrict Peshawar.</li> <li>29 Mohammad Sayar S/O Madumad Zakir Khan, C/O Abdul Wadud Manager Alliedf Bank Chitral.</li> <li>29 Mohammad SiQO Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Boad Mardan. C/O Near Malakand Bypass Boad Mardan. C/O Near Malakand Bypass</li> </ul>		C.O. Taru Jabba District & Tehsil	Science GG K D A
<ul> <li>Mohammad Ayaz S/O Said Majeed, Vill: Amankot P.O. Box. Pabbi , Tehsil &amp; District Nowshera.</li> <li>V 21 Riasat-Khan S/O Abdui Qayyun KFan, C/O Mohammad Jan(Shopkeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Ashraf, S/O Eichannad Ashraf, Paracha Town Rawalpindi Road Kohat.</li> <li>23 Shamsul Quyun, S#O Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Futhi Khel) Tehsil Paharpur District D.J.Khan.</li> <li>24 Mohammad Dand S#O Mohammad Miskeen, H.N.3.81-A/5 TIP Housing Colony Haripur Lizara.</li> <li>25 Rehman Wali S/O Abdul Satar, Vill: Biland Qilla P.O. Sabi Abda Tehsil Karak.</li> <li>26 Abdul Waliab S/O Abdul Satar, Vill: Jamra P.O. SNC Takhr Bhai Mardan.</li> <li>27 Mohammad Bashir 3/O Khandan Khan, Vill: Khatki Sharif(Michil) via Warsak Colöny Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Svabi.</li> <li>29 Mohammad Sayar S/O Madummad Zakir Khan, C/O Abdul Wadud Manager Allietf" Bank Chitral.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony ner Malakand Bypass Boad Mardan. C/O Nerar Malakand Bypass Boad Mardan.</li> </ul>	· · · · · · · · · · · · · · · · · · ·		Kohat.
<ul> <li>Anankol P.O. Box. Pabbi , Tehsil &amp; Science, GC, Pabbi , Tehsil &amp; District Nowshera.</li> <li>21 Riasat-Khan S/O -Abdui Qayyum KFan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Ashraf, S/O Alodia Goyum S/a Abdul Qadir, Vill: Choonakan, P.O. Nawan Shehr District &amp; Science, GPGC, Abbottabad.</li> <li>23 Shameal Qayum, S/O Abdul Qadir, Vill &amp; Lecturer in Computer Science, GPGC, Vicial.</li> <li>23 Shameal Qayum, S/O Abdul Qadir, Vill &amp; Lecturer in Computer Science, GPGC, Vicial.</li> <li>24 Mohammad Daud S/O Mohammad Ashraf, D.J.Khan.</li> <li>24 Mohammad Daud S/O Mohammad Miskeen, H.N.5.381-A/5 TIP Housing Colony Haripur Hazara.</li> <li>25 Rehman Wall S/O Norr-tr-Rehman, Vill: Biland Qilta P.O. Sabir Abad Tehsil Karak. GPGC, Haripur, Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bashir G/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colony Teshil &amp; Disfriet Peshawar.</li> <li>28 Mohammad Sayar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Labor District Swabi.</li> <li>29 Mohammad Sayar S/O Mohammad Zakir Khan, C/O Abdul Wadud Manager Allielf</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Ruad Mardan. C/C Mardan C/C Mard</li></ul>	20	Mohammad Ayaz S/O Said Majeed, Vill:	
<ul> <li>21 Riasat-Khan S/O Abdul Qayyum Khan, C/O Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Asharf, S/O Lieliammad Ashraf, Paracha Town Row Ipindi Road Kohat.</li> <li>23 Shamsal Quyum, S/O Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Kuthi Khel) Tehsil Paharpur District D.J.Khan.</li> <li>24 Mohammad Daud S/O Mohammad Miskeen, H.N.3.81-A/5 TIP Housing Colony Haripur Barara.</li> <li>25 Rehman Wali S/O Norr-ur-Rehman, Vill: Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>26 Abdul Waliab S/O Abdul Sattar, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bashir S/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colöny Teshil &amp; Disfriet Peshawar.</li> <li>28 Mohammad Sayar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Labor District Svabi.</li> <li>29 Mohammad Sayar S/O Mahammad Zakir Khan, C/O Abdul Wadud Manager Allielf* Bank Chitral.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Buad Mardan.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass</li> </ul>		WHANKOUP,O. Box, Pabbi , Tebsil &	Science, GO Dabbi
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<ul> <li>Cro Mohammad Jan(Shopkeeper) Vill: Choonakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>Jawad Ashraf, S/Q Michammad Ashraf, Paracha Town Raw-Ipindi Road Kohat.</li> <li>Science, GPGC, Metan.</li> <li>Shamsul Quyuun, S20 Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Kuthi Khel) Tehsil Paharpur District D.J.Khan.</li> <li>Wohammad Daud S20 Mohammad Miskeen, H.N.5.381-A/3 TP Housing Colony Haripur (Jazara, Biland Qilla P.O. Sabit Abad Tehsil Karak, Biland Qilla P.O. Sabit Abad Tehsil Karak, GPGC, Haripur, Jamra P.O. SNC Takht Bhai Mardan, Vill: Khatki Sharif(Michni) via Warsak Colony Teshil &amp; Disfrict Peshawar,</li> <li>Mohammad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Rahamad Sayar S/O Razdar Ali, Vill: Lecturer in Geography, GC, Balakot,</li> <li>Mohammad Saleh S/O Mohammad Zakir Khan, C/O Abdul Wadud Manager Allieff Bank Chitral,</li> <li>Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Rypass</li> <li>Bank Chitral, Colony near Malakand Rypass</li> <li>Bank Chitral, Colony near Malakand Rypass</li> <li>Colony near Malakand Rypass</li> </ul>	$\sqrt{21}$	Riasat-Khan S/O Abdul Qayyum Khan.	Lecturer in Channel
<ul> <li>Chobhakan, P.O. Nawan Shehr District &amp; Tehsil Abbottabad.</li> <li>22 Jawad Ashraf, S/O Nichammad Ashraf, Paracha Town Ramulpindi Road Kohat.</li> <li>23 Shamaal Quyum, S/O Abdul Qadir, Vill &amp; Ceturer in Computer Science, GPGC, Periat.</li> <li>23 Shamaal Quyum, S/O Abdul Qadir, Vill &amp; Lecturer in Computer Science, GC, Panialar Data S/O Mohammad Miskeen, H.N.S.381-A/5 TIP Housing Colony Haripur Datara.</li> <li>24 Mohammad Daud S/O Mohammad Miskeen, H.N.S.381-A/5 TIP Housing Colony Haripur Datara.</li> <li>25 Rehman Wali S/O Norr-ur-Rehman, Vill: Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>26 Abdul Waliab S/O Abdul Sattar, Vill: Lecturer in Electronics, GPGC, Haripur, Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bashir S/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayyar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Swabi.</li> <li>29 Mohammad Sateh S/O Mehammad Zakir Khan, C/O Abdul Wadud Manager Allielf Bank Chitral.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Buad Mardan. C/O Ishama Ali Chitral.</li> </ul>	•	CO Mohammad Jan(Shopheener) Ville	Science CPCC
<ul> <li>22 Jawad Ashraf, S/O Kichammad Ashraf, Paracha Town Ramapindi Road Kohat.</li> <li>23 Shamsal Quyum, S20 Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Euthi Khel) Tehsit Paharpur District D.J.Khan.</li> <li>24 Mohammad Daud S20 Mohammad Miskeen, H.N.5.381-A/5 TIP Housing Colony Haripur Hazara.</li> <li>25 Rehman Wali S70 Norr-ur-Rehman, Vill: Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>26 Abdul Waliab S70 Abdul Sattar, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bashir 3/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayyar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Swabi.</li> <li>29 Mohammad S/O Michammad Zakii Khan, C/O Abdul Wadud Manager Allieff Bank Chitral.</li> <li>30 Ayaz Ahmad S/O Muntaz Mohammad, R/O Bajaur Colony near Malakand Bypass Buad Mardan C/O Maran Ali Qi Mardan.</li> </ul>		Choonakan, P.O. Nawan Shehr District &	Abbottabad
<ul> <li>Paracha Towit Rabulpindi Road Kohat.</li> <li>Science, GPGC, Veiat.</li> <li>Shamsal Quyum, S#J Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Kuthi Khel) Tehsil Paharpur District D.J.Khan.</li> <li>Mohammad Daud S#O Mohammad Miskeen, H.N.5.381-A/5 TIP Housing Colony Haripur Gazara.</li> <li>Rehman Wali S/O Norr-ur-Rehman, Vill: Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>GPGC, Haripur.</li> <li>Abdul Waliab S/O Abdul Sattar, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>Colony Teshil &amp; Disfrict Peshawar.</li> <li>Mohammad Sayyar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Swabi.</li> <li>Mohammad Sateh S/O Michammad Zakir Khan, C/O Abdul Wadud Manager Alfielf Bank Chitral.</li> <li>Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Boad Mardan.</li> <li>Colony near Malakand Bypass</li> <li>Band Colony near Malakand Bypass</li> <li>Boad Mardan.</li> <li>Colony near Malakand Bypass</li> </ul>		TCRSIF Abbottabad.	
<ul> <li>Paracha Towit Rabulpindi Road Kohat.</li> <li>Science, GPGC, Veiat.</li> <li>Shamsal Quyum, S#J Abdul Qadir, Vill &amp; P.O. Wanda Lohani, (Kuthi Khel) Tehsil Paharpur District D.J.Khan.</li> <li>Mohammad Daud S#O Mohammad Miskeen, H.N.5.381-A/5 TIP Housing Colony Haripur Gazara.</li> <li>Rehman Wali S/O Norr-ur-Rehman, Vill: Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>Biland Qilla P.O. Sabir Abad Tehsil Karak.</li> <li>GPGC, Haripur.</li> <li>Abdul Waliab S/O Abdul Sattar, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>Colony Teshil &amp; Disfrict Peshawar.</li> <li>Mohammad Sayyar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Swabi.</li> <li>Mohammad Sateh S/O Michammad Zakir Khan, C/O Abdul Wadud Manager Alfielf Bank Chitral.</li> <li>Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Boad Mardan.</li> <li>Colony near Malakand Bypass</li> <li>Band Colony near Malakand Bypass</li> <li>Boad Mardan.</li> <li>Colony near Malakand Bypass</li> </ul>	22	Jawad Ashraf, S/Q Mohammad Ashraf	Looluume in the second
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<ul> <li>26 Abdul Waliab S/O Abdul Sattar, Vill: Jamra P.O. SNC Takht Bhai Mardan.</li> <li>27 Mohammad Bashir S/O Khandan Khan, Vill: Khatki Sharif(Michni) via Warsak Colony Teshil &amp; Disfrict Peshawar.</li> <li>28 Mohammad Sayyar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Swabi.</li> <li>29 Mohammad Sateh S/O Michammad Zakir Khan, C/O Abdul Wadud Manager Alliedf</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass</li> <li>Boad Mardan, C/O Mardan, Ali, Ville, Sond Mardan, C/O Mardan</li></ul>	25	Rehman Wali S/O Norr-ur-Rehman Ville	
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<ul> <li>28 Mohammad Sayyar S/O Razdar Ali, Vill: Tanu Dheri P.O. Box. Bazar Tehsil Lahor District Swabi.</li> <li>29 Mohammad Sateh S/O Mehammad Zakir Khan, C/O Abdul Wadud Manager Alfied Bank Chitral.</li> <li>30 Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Boad Mardan, C/O Havar Alfied</li> </ul>	.	VIII: Khatki Sharif(Michni) via Warrale	GC Khammer
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29       Mohammad Sateh S/O Michammad Zakir Khan, C/O Abdul Wadud Manager Alliett       GC, Balakot         30       Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass       Lecturer in English, GC, Mardan,	28	Mohammad Sayyar S/O Razdar Ali, Vals	<u> </u>
29       Mohammad Satch S/O Mohammad Zakir Khan, C/O Abdul Wadud Manager Allied Bank Chitral.       Lecturer in Geography, GC, Chitral.         30       Ayaz Ahmad S/O Mumtaz Mohammad, R/O Bajaur Colony near Malakand Bypass Boad Mardan, C/O Havar All Share All Share       Lecturer in English, GC, Mardan, Share		Tanu Duch P.Q. Box, Bazar Tehsil Labor	GC Balaiser
Rhan, C/O Abdul Wadud Manager Alliett       GC, Chitral.         Bank Chitral.       GC, Chitral.         30       Ayaz Ahmad S/O Mumtaz Mohammad, FR/O Bajaur Colony near Malakand Bypass       Lecturer in English, GC, Mardan, FR/O Bajaur Colony near Malakand Bypass	·	District Swabi.	CC, Danakot
Rhan, C/O Abdul Wadud Manager Alliett       GC, Chitral.         Bank Chitral.       GC, Chitral.         30       Ayaz Ahmad S/O Mumtaz Mohammad, FR/O Bajaur Colony near Malakand Bypass       Lecturer in English, GC, Mardan, FR/O Bajaur Colony near Malakand Bypass	· 29	Mohammad Satch S/O Michammad Zakir	Lecturer in C
30 Ayaz Ahmad S/O Mumtaz Mohammad, Lecturer in English, GC R/O Bajaur Colony near Malakand Bypass Mardan, Mardan,		Khan, C/O Abdul Wadud Manager Alfietr il	GC Chine
Rio Bajaur Colony near Malakand Bypass Mardan.		Dank Undral.	VC, CORTAL
Rio Bajaur Colony near Malakand Bypass Mardan.	30	Ayaz Ahmad S/O Mumtaz Mohammad	Lootusa
Lisoad Mardan (70) Janua Ali et al la		NO Balaur Colony near Malakand Bunner	Mordan In English, GC
		Road Mardan, C/O Hazia Ali Shonke way	
	•	in the provide the	

#### ADJUSTMENT.

31Mr. Attaullah Shah,<br/>lecturer in Zoology, Govt: CollegeGovt: CollegeAgainst<br/>Sarai NaurangSabir Abad, Karak.CollegeSarai Naurangvacant<br/>post

The appointment of the above lecturers will be subject to the following terms an conditions:-

TERMS & CONDITIONS. ۰i-They will sign the agreement form before joining service. ii-They will neither contribute any amount towards G.P.Fund nor they shall be entitled to any benefit from the GP Fund Scheme: . They will not claim annual increment. They will get fixed pay i.e. mitial pay iiiof BPS-17 including usual allowances as admissible under the rules. iv-They will not be considered for regularization at any stage. Their services will be liable to termination on one month's notice from either γ.side. In case of resignation without notice their one month's p.w/allowances, if any shall be fortigited to Government. No TA/DA will be blowed to the candidates. 11-The candidates should join their posts within 30-days of the issue of this ۰۱inotification: The Director Higher Education NWFP Peshawar should furnished a portificated to the effect that the candidates have joined the post or otherwise, after one month of the issue of this notification. They will be governed by such rules and regulations as may be issued from viii-Their services can be terminated at any time in case their performance is ix-٠. found unsatisfactory, and they will be proceeded against under the Removal from Service (Special Power) Ordinance 2000 and the E.& D rules 1973. They will not be transferred under any circumstances. X-1 Charge reports should be submitted to all concerned. Xi-SECRETARY TO GOVT: OF NWFP Muhammad Arshad Khan Jan HIGHER EDUCATION DEPARTMENT Advocate High Court ENDST: NO. SO(COLLEGES)2-5/2002 Office No: 33 Adjacent A copy of the above is forwarded to : Dated Peshawar the 1/8/2002. Jist Sar Abhamabad 1-Secretary to Governor NWFP, Peshawar, 2-Accountant General NWFP Peshawar, 3-P.S. to Chief Secretary NWFP Peshawar. 4-P.S. to Secretary Establishment & Administration Department Peshawár. 5-P.S. to Minister for Education NWFP Peshawar? P.S. to Secretary Finance Department NWFP Peshawar. 6-7. Director Higher Education NWFP Peshawar, along with application forms and other relevant documents i.e. Medical fitness Certificates of the elladidates. 8-Director of Education (FATA) NWFP Peshawar, 9-Director Recruitment NWFP Public Service Commission Peshawar. 10-All District Account/Agency Account Officers concerned, in NWPP. All Principals Government Colleges (Male) concerned in FWFF. 11-P.S. to Secretary Higher Education NWFP Peshawar. 12-13-P.A. to Additional Secretary Higher Education NWFP Peshawar. 14-P.A. to Deputy Secretary, Higner Education NWFP, Peshawar, Section Officer (FATA) Higher Education Department Peshawar, ... 15-16-Section Officer (General) Higher Education Department Peshawar 17-Manager, Government Printing Press, NWFP, Peshawar, 18-Officers Concerned. (Prof: MUHAMMAD ISMAIL WALL) . SECTION OFFICER (COLLEGES) Shal Schid

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GOVT: POSTGRADUATE COLLEGE NO. 1 ABBOTTABAD No. 2453 Dated 15. 8 12007

/Princ#pal;

Govt:Postgraduate College No.1, Abbottabad

Anned B

The Director of Higher Education, N.W.F.P, Peshawar

Sub: - <u>EX-PAKISTAN LEAVE</u> Dear Sir,

 $\mathbf{T}_{\mathbf{O}}$ 

Enclosed please find herewith an application for Ex-Pakistan leave without pay for two year w.e.f 01-09-2007 to 31-08-2009(730 days) in respect of Mr.Riasat Khan Lecturer in Computer Science of this College for further necessary action please.

Alleshed

มีเป็นสูง เรา ชุมุมอายุ เรา ชุมุมอายุ เรา เรา ชุมุมอายุ เรา เรา ชุมุมอายุ เรา เรา ชุมุมอายุ เ



DIRECTORATE HIGHER EDUCATION NWFP PESHAWAR. NO. 1561 /CA-II/Estt Branch. Dated Peshawar, the 3//2007.

The Principal GPGC No.1 A/Abad.

Subject:- <u>EX-PAKISTAN LEAVE</u>. Memo.

To

I am directed to refer to your letter No.2446 dt;13-08-2007 on the subject cited above and to state that the case has been examined and regretted.

The lecturer concerned may be informed accordingly please.

DIRECTOR HIGHER ZDUCATION NWFP PESHAWAR

Supati - you when phy

Attestel

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n kely to

Muhammad Arshad Khan Tanol Advocate High Court -00 Office No 33 Adjacent to Distt Bar Abbottabad

### DIRECTORATE OF HIGHER EDUCATION. N.W.F.P, PESHAWAR. Phone # 091-9211025, 091-9210242, Fax # 091-9210242

\_/CA-II/Estt: Branch

2007 Dated Peshawar the

The Section Officer (Colleges) Govl; of NWFP, Higher Education Department, Peshawar,

SUBJECT Memo:

No.

Τo

#### EX-PAKISTAN LEAVE.

I am directed to enclose herewith leave application on prescribed form in respect of Mr. Riasat Khan lecturer in Computer Science Govt; Post Graduate College, No. 1 Abbottabad regarding Ex- Pakistan Leave without pay for two years WEF 01.09.2007 to 31.08.2009 (730 days) for further necessary action in the light of leave admissibility report recorded by the District Accounts Officer concerned on the body of the application.

The lecturer concerned has been working in this Department

since 01.08.2002.

The case may be processed as per rules, please.

Allesled Mui Alle

Advocate High Court stad Khan Janol Office No 33 Adjacent to Disit 3ar Abbottabad

DY: DIRECTOR HIGHER EDUCATION NWFP, PESHAWAR.

17882 Endst: No.

DY: DIRECTOR HIGHER EDUCATION

Copy forwarded to the Principal Govt; Post Graduate College, No. 1 Abbottabad with reference to his letter No. 2953 dated 15.08.2007.

NWFP, PESHAWAR.

## P-15

## DIRECTORATE OF HIGHER EDUCATION N.W.F.P, PESHAWAR.

Phone # (191-9211025, 091-9210242, Fax # 091-9210242

No. To

÷.,

\_\_/CA-II/Estt: Branch Dated Peshawar the 1/2/2008

The Section Officer (Colleges) Govt: of NWFP, Higher Education Department.

#### SUBJECT <u>EX- PAKISTAN LEAVE.</u> Memo:

I am directed to refer to your letter No. SO (C)IX-3/2007 dated 27.10.2007 on the subject cited above and to enclose herewith a self-explanatory application in respect of Mr. Riasat Khan lecturer in Computer Science Govt; Post Graduate College, No. 1 Abbottabad for perusal and necessary action with the remarks that the lecturer concerned got a job in King Khalid University and the wants Ex- Pakistan leave as is evident from his application. Moreover, the Establishment Department Govt; of NWFP is scrutinizing/checking these cases and ofter their approval persons concerned are allowed to proceed abroad for employment. In this case neither the lecturer concerned applied through proper channel nor his case has been sent to the scrutiny Committee. Instead he applied for Ex- Pakistan leave concealing the facts from the Department.

It is requested that the case may be considered as per rules, please.

Endst: No. 2921

11-15-

Riss-7 KL

Girl Comment

Copy to the Principal Govt; Post Graduate College, No. 1 Abbottabad with reference to his Endst: No. 3012 dated 13.02.2008 with the remarks

that the lecturer may not be relieved of his duties till finalization of the case.

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DY: DIRECTOR HIGHER EDUCATION

N.W.F.P, PESHAWAR.

DY: DIRECTOR HIGHER EDUCATION N.W.F.P. PESHAWAR. 34

Ueste Muhammad Arshad Khan Tanoii

Advocate High Court i Office No 33 Adjacent to Disit Or Abbottabad

P-16

OFFICE OF THE FRINCIPAL GOVE: FORFGRADUATE COLLEGE A.ADAD.

Dated A.Abad 507/ No 3 /2008. the

To

Mr. Riasat Khon, Locturer in Computer Science, (Local College) R/O C/O Euhammad Jan Shophceper, Chowmalcari, P/O Hawanshchr(A.Abad).

#### Subject:- EX\_PARTEMAN LEAVE.

Nemo:-

Enclosed please find herewith a copy of letter No.2920 dated 21/2/2003 for information and further necessary action please.

Principal, Goyt:Postgraduate College, lo.I.Abbottebud.

5072 Endst:No.

1.

Copy to:-

The Director of Higher Education, HETP, Poshawar with reference to above with the remarks that the Official concerned applied for Ex-Pakistan leave with effect from 1.9.2007 to 31.8.2008 without pay. He is absent from his duty from the date of commencement of his leave. However his pay has been stoped w.e.f 1.9.2007. The report is submitted for information and further necessary action please.

Allest.

Muhammad Arshad Khan Tanoli Advocate High Court Office No 33 Adjacent to Distt Bar Abbottabad

Principal, Govt:Postgraduate College, No.I. Apportabad.

#### DIRECTORATE OF HIGHER EDUCATION GOVERNMENT OF NIVEP, KEYBER ROAD PESHANYAR Phone No.921102/-9210217 Fax No.9210242

Dated Peshawar the 2/ 

The Section Offleer (Colleges) Govt: of NWFP, Higher Education Department Peshawar,

SUBJECT Memo;

#### EX-PAKISTAN LEAVE

/CA-II/Esti: Branch

In continuation of this office letter No. 2920 dated 21.02.2008. Enclosed find herewith a copy of letter No. 3071 dated 05.03.2008 received from Principal Govt: Post Graduate College, No. 1 Abbottabad addressed to the tecturer concerned and copy thereof endorsed to this office for further necessary action.

611 Endst: No.

Alt Acount to former

#### BY: DIRECTOR HIGHER EDUCATION N.W.F.P, PESHAWAR.

Copy for information to the Principal Govl; Post Graduate College, No. 1 Abbottabad with reference to his letter referred above.

DY: DIREC IORÈIG

Y: DIRECTOR HIGHER EDUCATION N.W.F.P. PESHAWAR, A-L

Allested

Myhämmad Tröhad Khan Tanoli Agygdata High Court Yer Əffica No 33 Adjacent to Disyt Bar Abbottabad

E HEAZONCOMENTADA/PACE DI-

.. hh x\_ E,

The Secretary, Higher Education Department,

Peshawar.

Through:

To

The Director, Higher Education Department, Govt of Khyber Pakhtunkhwa, Peshawar.

Govt of Khyber Pakhtunkhwa,

Subject:

#### AS <u>REINSTATMENT</u> "APPEAL/APPLICATION FOR BPS-17(REGULAR)" <u>LECTURER (COMPUTER SCIENCE)</u>

R/Sir,

With deference, it is submitted that I was appointed as Lecturer (Computer Science) BPS-17 on merit in 2002 vide. my Appointment Order. No. SO(COLLEGES)2-5/2002 Dated.01/08/2002 and posted in the Govt Post Graduate College No. 01 Abbottabad vide. Arrival Report. Dated. 01/08/2002 & Transfer of Charge. Dated.26/08/2002. In August 2007, I forwarded an application for long leave. Accordingly, admissibility Report for my Privilege leave was obtained from the District Account Office Abbottabad for further necessary action at the end of College. The Higher Education department raised objections on my application which were removed/ cleared and replied honestly on the basis of true facts. Later on, in 2009, no other detail/correspondence was conveyed to me in any form except a Notice of absence. Due to some personal obligations and family matters, I was unable to attend the college, assuming that my leave was approved, as I had enough balance of earned leave at my credit and I followed the proper procedure to get the leave. In spite of my repeated requests, the College Administration remained uncooperative to give me access to my Personal file in order to enable me to know the exact status of leave Application. I could neither be served upon the Show Cause Notice, Personal Hearing etc. before issuance of so-called Order for Removal of my Service nor anything else relating to termination of my Service was conveyed/delivered to me in black & white by hand/registered post etc.

It is narrated with bona-fide intentions that I was interested in continuing my job at that time, rather than to resign from my service. Therefore, I applied for leave through proper channel Furthermore, it is pertinent to mention that one of the College Assistant Professor was granted Ex-Pakistan leave on the same grounds vide. College Notice Dated. 30-08-2005(copy of the same is annexed

Allested

Arshed Khan Tanoli Advocate High Court 1 Office No. 33 Adjacent to Distt 3ar Abbottabad

P- 19

herewith for ready reference). On the other hand, I was deprived of my due right, which is not at par with the domain of justice. I was not intimated in any form about sanction of leave or otherwise and was also not informed about the provision/eligibility for grant of Earned leave existed at my credit.

Para-wise detail of the subject case is elaborated hereunder besides the above:

I served my Department of Higher Education by working in Govt. Post Graduate College. No.01 Abbottabad from 2001-02 to 2007 for more than Six valuable period of my Service Career and also I remained In-charge of Computer Science department at the same college(Copy enclosed herewith).

Leave Application was forwarded on prescribed Performa under Civil Servants Revised Leave Rules, 1981 which indicate:

**Rule 16(1)** "Leave Ex-Pakistan may be granted on full pay to a Civil Servant who applied for any such leave or who proceeds abroad during leave or takes leave while posted abroad or is otherwise on duty abroad and makes a specific request to that effect."

Rule 16(6)

**Rule 17** (Assigning Reasons for leave)----"It shall not be necessary to specify the reasons for which leave has been applied, so long as that leave is due and admissible to a Civil Servant"

Rule 23 (Any type of leave may be applied) Rule 31(1) (Leave application, its sanction etc.)

- I have an excellent Educational record which stands exemplary and outstanding with standard of A-Grade throughout my career from School to University( i.e Primary, SSC to Post graduation Degree ).Attested copies of my testimonials are enclosed herewith for information and ready reference.
- In-fact, I belong to the middle Class of the Society and self-made person and earned all with the grace of Al-Mighty Allah and by dint of my hard work in the life. I have a large family to support and many responsibilities are lying on my shoulders. Therefore, it is requested that my Application/Appeal may be considered sympathetically on humanitarian basis and *I may please be reinstated in service as Lecturer BPS-17* in the Higher Education Department by bridging my service from 2007-08 to date.

Allelee Man.

Muhammad Arshad Khan Tanes Advocate High Court In Office No 33 Adjacent to Digit Par Abbottabad

ii)

iii)

i)

ii)

If a chance is given to me to serve the Higher Education Department, I will discharge my duties to the entire satisfaction of my Seniors. I assure you that my experience & expertise would certainly benefit the department being the important Citizen of Pakistan.

It is worth-mentioning and brought to the notice of concerned helm of affairs that no proper procedure was adopted for *Removal of my Service* under the existing *Rules of Service*. No reasonable opportunity was given to me for my defense and ex-parte action was taken against me.

Any proceeding to this effect may be intimated to me in black &

white.

18-10-20

<u>Note</u>: Attested copies of all relevant documents of my Education & Service are enclosed herewith for your due favour.

Yours obediently,

2-20

Riasat Khan

H.No 35A, Ilyasi Masjid Rd. Thanda Choha, Chunakari Nawan Shehr, Abbottabad.

Contact: 03335041456

Allester

Muhammad Sco Advocate High Court Office No 33 Adjacent to Distt Bar Abbottabad

7. iv)

v)

The Scoretary Higher Education Deputments Government of Khyber Pakhtunkhwa Peshawar

The Director Higher Education Department Government of Khyber Rakhturkhya, a Peshawa

REQUEST: FOR REINSTATEMENTS AS LEFECTURER (COMPUTER SCIENCE) BPS-17 REGULAR:

Anner

With due trespect all is submitted that fewas appointed (as fecturer on merit in 2002 and was posted in Government Post Graduate College. No.1 Abbotabad In august 2007 due to domestic issues it submitted an application for long leave. Accordingly admissibility report to leave was forwarded by District Account Office Abbotabad to my college for further necessary action with some observation from HED which were cleared then traterion in 2009 anotice of absence was served but due to some personal term was neither served any Show Cause Notice not received any letter for removing me from my service

am deprived of my due right which is not all partwith the domain of justice i have an excellent reducational record which is not all partwith the domain of outstanding with A - Grade throughout my career from school to University. I belong to middle class society and/al sett made person with a large - family to support fit is therefore humbly requested that my application may be considered sympathetically on humanitanian grounds and reinstate mean service as lecturer (BPS-17 in Higher Education Department, 12 definitely assure you that my experience & expertise would certainly benefit; the idepartment, 11 is worth

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Note : Attested copies, of all relevant documents of my education & service are enclosed herewith for ready reference

Yours Opediently

Riasat Khan:

Email initiasat@gmail.com

Subject:

Alleslick

Advoctor High Court N Advoctor High Court N Afflee No 33 Adjacent to High Bar # Schtabad

#### GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

Dated Peshawar the 26.07.2010.

#### <u>NOTIFICATION</u>

No. SO (COLLEGES)/09-2010/XI-8/2006. The Competent Authority is pleased to remove/Mr. Riasat Khan, lecturer in Computer Science (BPS-17), Govr. Post Graduate College, No. 1, Abbottabad from Govt. service, with immediate effort on account of his long willful absence from duties.

**Note:** - The period w.e.f 01.09.2007 to till date may be treated as un-authorized absence from duties without pay.

#### SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA HIGHEFR EDUCATON DEPARTMENT

#### Endst: No. & Date Even.

Copy forwarded to the:-

- 1. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar with the request to remove his name from the seniority list.
- 2. Principal Govt. Post Graduate College, No. 1, Abbottabad.
- 3. District Accounts Officer, Abbottabad.

Affice Supplet.

R. inform The Att

Copy received 25/1420

- 4. Deputy Director (IT), Planning Cell, Higher Education Department.
- 5: Officer concerned.

SECTION OFFICER (COLLEGES)

19012.

Allested

Muhammad Arshad Khan Tanoli Advocate High Court Office No: 33 Adjacent to Dicit Dar Abbottabad

وكالبث نامه كوري فيس Chairman Service Tribunal KPK Peshawar Appallant منجانب: نوعيت مقدمه باعث تحريراً نكه مقدمه مندرجه میں اپنی طرف سے داسے پیروی وجواب دہی کل کار دائی متعلقہ آں مقام Abbettabad M. Arshad Khay Tanali Adv He ATO کووکیل مقرر کر کے اقر ارکرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کا روائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ وتقرر ثالث و فیصلہ برحلف ودینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک رو پیہ وعرض دعویٰ کی تصدیق اور اس پر دستخط کرنے گاا ختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل پاکسی جزومی کاروائی کے لئے کسی اور وکیل یا مختارصاحب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختایر بھی ہوگا اور صاحب مقرر شدہ کوبھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قہول ہوگا۔ دوران مقدمہ جوخرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایار قم وصول کرنے کابھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہویا حد سے باہر ہوتو وکیل صاحب موصوف یا بند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراداستجارت نائش بصیغہ مفلس کے دائر کرنے اور اس کے ، پیروی کابھی صاحب موصوف کواختیار ہوگا۔ لېذادكالت نامة تحريركرديا تا كەسندر يے۔ الرقام عد مارت ما مد م -ABBOTTABAN : 100. Accept M. Arshad Khan Tanoli Adv High Court Atd

## IN THE COURT OF HONOURABLE SERVICE TRIBUNAL KPK ABBOTTABAD

#### **AFFIDAVIT**

I, Muhammad Shakeel, Law Officer, Higher Education Department Khyber Pakhtunkhwa Peshawar do hereby affirm and certify that the contents of the attached comments / reply of the Department of the Higher Education in case No. S.A # 4277/2021, titled Riasat Khan V/S Government of KPK, are true to the best of my knowledge and belief.

#### Deponent\_

Muhammad Shakeel Assistant Prof/ Law Offcer GPGC No. 1, Abbottabad



## BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNALAT CAMP COURT ABBOTTABAD

#### Versus

.....Respondents

Govt. of Khyber Pakhtunkhwa ThroughChief Secretary &others.....

## SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 to 4

. . . . . . . . . . . . . . . .

#### **Respectfully Sheweth:-**

#### **Preliminary Objections:-**

- 1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
- 2. That the appellant has not come to this Honourable Tribunal with clean hands.
- $\sim$  3.  $\sim$  That the appellant is trying to conceal material facts.
- 4. That the appellant is estopped by his own conduct to file the instant service appeal.
- 5. That the instant Service Appeal is badly time barred as the same is filed after 11 years of his removal from service.
- 6. That the instant Service Appeal is not maintainable and this Tribunal Lacks Jurisdiction to entertain the instant Service Appeal under section 4(a) of Khyber Pakhtunkhwa Service Tribunal Act, 1974 as the appellant did not filed departmental Appeal.

## **Reply on Facts:-**

- 1. Correct to the extent that the appellant was appointed as Lecturer in Higher Education department.
- 2. Pertains to Record.
- 3. Correct to the extent that the appellant applied for Ex-Pakistan leave through proper channel for 02 years w.e.f 01-09-2007 ot 31-08-2009. It is pertinent to mention here that the appellant got job in King Medical University but he did not apply through proper channel and did not get NOC from the department before applying to the said post and concealed it from the department. That the appellant without sanctioning of his leave went abroad.
- 4. That the appellant himself accepted in this Para that his leave was not sanctioned and he went abroad, meaning there by that he was wilful absent from duty. As the appellant was wilful absent w.e.f 01-09-2007, absence Notice dated: 07-07-2009 and 22-07-2009 was issued at his home address by the office of respondent No. 3 & 4 respectively to report for duty within 15 days (Annex-A). But the appellant did not report for duty rather submitted an

application dated: 02-09-2009 wherein he again requested for approval of Ex-Pakistan leave w.e.f 01-09-2007 to 31-08-2009 and also requested for extension in Ex-Pakistan leave for one more year upto 31-08-2010. (Annex-B). As the appellant did not report for duty, as a result he was removed from service due to long wilful absence from duties vide notification dated: 26-07-2010 (Annex-C)

- 5. Incorrect. As no such representation is available in the official record.
- 6. Incorrect. No departmental appeal is available in official record. It is pertinent to mention here that the date mentioned on the departmental Appeal attached with Service Appeal as Annex-D is 18-12-2020 which shows unjustified gap of 10 years.
- 7. Incorrect. As no such departmental Appeal is available in official record.

### **Reply on Grounds:** -

and the second states of the second second

- Incorrect. That the removal order is in accordance with law/rule. Α.
- В. Incorrect. The appellant was removed from service after fulfilment of all codal formalities.
- C. Incorrect. As already explained in preceding paras.
- D. Incorrect. As already explained in preceding paras.
- E. Incorrect. As already explained, all codal formalities were fulfilled.
- F. That the instant Service Appeal is badly time barred.

## Prayer:-

It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/misstatements hence may graciously be dismissed.

Chief Secretary, Govt; & Khyber Pakhtunkhwa Respondent No. 01

Postgraduste College Ma

and the second second

Secretary, **Higher Education Department** Respondent No. Q2

7/2022 Director,

Higher Education Department Respondent No. 03

Principal, Govt; Postgraduate College, No. 1 Abbottabad Respondent No. 04

PRINCIPAL

#### 10 GISTER D

## DIRECTORATE OF HIGHER EDUCATION NWTP, PESHAWAR,

# Phone # 1671-0211125, 101-0210242, 1 ny # 1001-0210242

# No.\_\_\_\_\_CA-H-FsutBranch.

Dated Pashawar, the

2009

#### То

Middiasa Khua 1 centrer in Computer Science (FGT No.). Albonabad Co Muhamaral Jan Shapkeeper. Choonakani, P.O Navanshebr Alexandrade

#### ABSENCE FROM DUTY, Subject +

Mente

You got a jub In King Abalia thus ersity (Saudi Atabia) for which you did that apply through proper channel. Instead, you applied for Ex-Pakistan leave for 112 years well nt (61.2007 to 31.68.2009 concealing the facts from the Department and left the Department without waiting for approval of the Competent Authority. You are withfully absent from data wei 01 60,2007 10 d the

You are directed in your own interest to report for days within 15 days positively of the receipt of this letter inding which it will be presented that you are not interested in your vervice and disciplinary action under RSCI-2004 will be initiated againt you in colourating your distanced from service

## DY, DIRECTOR (ESTABLISHMENT) HIGH R FDFF ATION SWIP, PENDAWAR.

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## Copy is forwarded to these,

- Principal GPGC No.1 Althoughout wir to his Joner No.6110 (2071) dated 05:03 2068 with the request to contact the lecturer concerned on his home address to report for day within fifteen days of the receipt of this letter paraticely otherwise disciplicary
- Section officer (Collegent Govern) NWTP, Higher Education Dispariment Peshawat 1 worke his letter No. SORCE 15, 320000 dated 02 06, 2009.
- 40 PAIL 1- -1-400055 -1-

DY: DRUCTOR (USTABLISHNES ) IGRIDIEL DESCALION NWEE, PESHAWAR,

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h: Postgraduite College.

Covi: Postgraduále College,

Mr.Rhasai Khan, Lecturer in Comptoer Science, CPGC No.1 Athlighthat C/ONInhammad Jan Shapkeeper Chisomakari 1915 Mawairshelin Also italia L.

#### ABSENCE FROM DETY: Sub:

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Enclosed please find herewith copy of lever No. 149.7637 A/Esti: Branch dated 2/1/2009 (Copy intiched) received from Director of Higher Edocation NWFF. Performance

Yea are directed to report for thiry within 15 days positively . fulling which disciplinary action will be taken agained you.

C/ Ţ Endst No. 10.5

The Director of Higher fiducation NWPP, Peshawar wir to above for intermation please.

## Dured (CARL 2019)

Director of higher Education N.W.F.P. Peshowar

Front

### Rinsat Khañ Ezeturet Corriginer Science Gavi, Posigraduate College Nat "Abjoutabäd.

Similar

## Request for approva lextension of Ex-Pakistan leave

Respected sir.

Reference to your letter nor (4925 dated 07:07/2009 regarding Ex-Pakisum letve(without pix) for job b) King Khalld University Satali Arabia, it is submitted that I applied for the said job incough internet and the mean time applied for Ex-Pakisum tenve and clearly invariance all the facts and purpose of the leave and did not conceal anything. I could not find any proper channel to rease the application could be incough internet. I also third your esterined office many times for sinction of leave but it is ny bad fact that my leave has not been approved even after two years and now Treceived the fetter of intrination to report.

Sire Emaibly request you kindly to grant the RS-Pakistan heavy the two. Years w.e.f. 01409/2007 to 31:08/2009 and also I will be grateful if you kindly extend the leave for one more year up to 31:08/2010 1 will be thinkful for this favore.

Rifsh Khun

Leolarei, Coniputer Solcher Govi, Fosigizidaare College Not. Abbanalisid

Copy forwarded to:

Principal Gov). Postgratiane College Nat Abbomball

## GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

Dated Peshawar the 26.07.2010.

## NOTIFICATION

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## SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA HIGHEFR EDUCATON DEPARTMENT

## Endst: No. & Date Even.

Copy forwarded to the:-

- Director, Higher Education, Khyber Pakhtunkhwa, Peshawar with me request to remove his name from the seniority list.
- 2. Principal Govt. Post Graduate College, No. 1, Abbottabad.
- 3. District Accounts Officer, Abbottabad.

office Supat.

4. Deputy Director (IT), Planning Cell, Higher Education Department.

110.00

5. Officer concerned.

SECTION OFFICER (COLLEGES)

or then can have



## GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION DEPARTMENT

## AUTHORITY LETTER

Mr. Muhammad Shakil Law Officer, Higher Education Department Khyber Pakhtunkhwa Abbottabad is hereby authorized to attend and submit JPWC in Service Appeal No. 4277/2022, Titled Riasat Khan VS Govt. of Khyber Pakhtunkhwa in the provincial Service Tribunal Camp Court Abbottabad in the cases pertain to Higher Education Department Khyber Pakhtunkhwa on behalf of official respondents.

DEPUTY SECRETA HIGHER E ENT ¥¥ Higher Education Archives & Libraries Department

## BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL AT CAMP COURT ABBOTTABAD

S.A # 4277/2021 Riasat Khan ......Appellant

#### Versus

Govt. of Khyber Pakhtunkhwa	۲. ۴
Through Chief Secretary	
& others	
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- A. Incorrect. That the removal order is in accordance with law/rule.
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Chief Secretary, Govt; of Khyber Pakhtunkhwa Respondent No. 01

Director,

Higher Education Department Respondent No. 03

Secretary, Higher Education Department Respondent No. 02

PRINCIPAL Gove: Postgraduoto Collega (42.) Antariada Principal,

Govt; Postgraduate College, No. 1 Abbottabad Respondent No. 04 REPRESENTER

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## DIRECTORATE OF HIGHER EDUCATION. NW FP, PESHAWAR. Phone # 1811-0211025, 101-0210242, 1 ny # 101-0210242 11:12

Dated Pashawar.

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to entopointing same dimment from service.

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action will be more agained mut. Section officier (Callegori Großfolf MWP), Hogher Education Generationen Bedereus.

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GOVT: POSTGRADUATE 1.111

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## ABSUNCE FROM DUTY

Monae Enclosed please find becewalt vory of lefter No. (2016) CAPSH. Branch dated 2072/2010 Copy anached) received from Director of Higher February SWEP. Peshawar.

You are directed to report for daty within 15 dats positively. Tailing which disciptions beton will be taken against you

N. 971

e Priacipata (pw) Postgraduate College. wahid

.Dated

<u>97:</u>2. Endst No. оруна.-

The Director of Higher Education NWEP, Pestiliwar within above hit

information please.

ितंबदेवृद्धी, three Postgraduate College.

Ast and and

## **BETTER COPY**



## **REGISTERED**

## DIRECTORATE OF HIGHER EDUCATION, NWFP, PESHAWAR

Phone# 091-9211025, 091-210242, Fax# 091-9210242

Dated Peshawar # 27/7/2009

To,

Mr. Riasat Khan Lecturer in computer science Govt. PGC No. 1 Abbottabad C/o Muhmmad Jan Shopkeeper Chunakari P/o Nawansher Abbottabad

## Subject: <u>ABSENCE FROM DUTY</u>

You got a job in King Khalad Dynasty, Saudia Arabir for which you do not apply through proper channel inveal, for applied for Ex-Pakistan leave for 02 years w.e.f from 04-09-2007 to 31-08-2009 come calling the facts for the Department ... for the Department without waiting for approval of the Competent Authority. You are with falls absent from duty w.e.f ....

You are directed in your own interest to report for within 15 days of the receipt of this letter which it will be presented that you are not ... from service.

## HIGHER EDUCATION NWFP, PESHAWAR

Endst: 14926.27

Copy is forwarded to the:

- 1. Principal GPGC No. Abbottabad w.e.f to this letter no. 14925 dated 27.07.2009 with the request to contact that letting concerned on his house address to within fifteen days at the receipt at the receipt of this letter, other wise disciplinary action will be taken against him.
- 2. Section officer (Govt. of NWFP). Higher Education Department Peshawar

## **DY: DIRECTOR ESTABLISHMENT**

HIGHER EDUCATION NWFP PESHAWAR

## **BETTER COPY**



No. 971 dated 22/07/2009

To,

Mr. Riasat Khan Lecturer in Computer Science GPGC No. 1 Abbottabad C/o Muhammad Jan Shopkeeper Chunakari P/o Nawansher Abbottabad.

## Sub: ABSENCE FROM DUTY

Memo

Please find herewith copy of letter no. 14926CA Bench dated. Copy is attached received from director of higher Education NWFP, Peshawar.

You are directed to report for within 15 days positively. Filing which disciplinary action will be taken against you.

Sd/-Principal, Govt. Postgraduate College, Abbottabad

## Endst. No. 972

Copy to:-

The Director of Higher Education NWFP, Peshawar w.e.f to above for information please.

Sd/-Principal, Govt. Postgraduate College, Abbottabad Deressing of Lighter Laboration N.W.J. P., thestory in

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Elean

### Rinsat Khan Eastura Computer Science Gove Postgraduate College Not, Abhstrahad,

#### Request for approvallentension of FrePakistan leave

#### Respected in

Subject

Reference to your lange no 14925 dated 17707/2009 regarding Ex-Pakastan here evolution pays for job in King Khalid University Saudi Arabia, it is submitted that I applied for the scal job through interact and the mean time applied for Ex-Pakistan heave and clearly mentioned all the face and purpose of the lower and slid not concred anything I could not find any proper channel to reme the appleatest couling through interact. I also visited your exterined office many times for samenor of leave but it is my bad lack that the heave has not been approved even after two years and may I received the letter of interaction to regist.

Sir, Franchly request you knully to grant use EX-Palastan leave for two Neuron weat for any 2007 to 31 08, 2004 and also 5 will be praterial if you farally extend the leave for one nume you opto 34 68 2016 Uself be thankful for this favor.

Life)i Mun j Lediter Computer Science

Econtrol Computer Science Cont. Postgradante College Weit (Minnahad)

Copy forwarded to:

Principal Gost, Polagradiane College Natl Athantabid



Dated : 02-09-2009

To,

Director of Higher Education NWFP, Peshawar

From:

Riasat Khan Lecturer Computer Science Govt. Postgraduate College No.1 Abbottabad.

# Subject: <u>REQUEST FOR APPROVAL EXTENSION OF EX-PAKISTAN LEAVE</u>

Respected sir,

Reference to your letter no. 14925 dated 07.07.2009 regarding Ex-Pakistan without pay for job in King Khalid University Saudia Arabia. It is submitted that I appled for the said job through internet and the mean time applied for Ex-Pakistan leave and clearly mentioned all the facts and purposes of the leave and did not conceal anything. I could not find any proper channel to the application online through internet. I visited your esteemed office many times for sanction of leave but it is my bad luck that my leave has not been approved even after two years and now I received the letter at initiative to report.

Sir, humbly request you kindly to grant the Ex-Pakistan leave for two years w.e.f to 04-09-2007 to 04-08-2008 and I will be grateful to you kindly extend the leave for one year upto 04-08-2009.

I will be thankful to you for this favour.

Riasat Khan, Lecturer Computer Science Govt. Postgraduate College No.1 Abbottabad.

Copy forwarded to:

Principal Govt. Postgraduate College No.1 Abbottabad.