


21<sup>st</sup> Oct., 2022. Nemo for the appellant. Kabirullah Khattak, Addl.

AG for the respondents present. Lawyers are on strike.

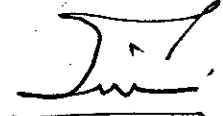
Fresh notices be issued to appellant and his counsel.

To come up for arguments on 27.12.2022 before D.B.

  
**(Fareeha Paul)**  
**Member(E)**

19.01.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and sought time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 18.04.2022 before the S.B at Camp Court Abbottabad.

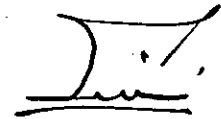


(Salah-ud-Din)  
Member (J)  
Camp Court A/Abad

18.04.2022

Clerk of learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney present.

Representatives of the respondents are absent, therefore, notices be issued to the respondents through registered post and to come up for submission of written reply/comments on 17.06.2022 before the S.B at Camp Court Abbottabad.



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

17.06 2022

Appellant present in person. Mr. Muhammad Adeel, Additional Advocate General alongwith DEO (M) Battagram and Latif Ullah, Litigation Officer for respondents present.

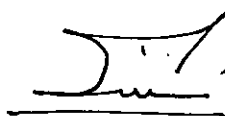
Written reply/comments on behalf of the respondents submitted which is placed on file. A copy of the same is also handed over to the appellant. To come up for rejoinder if any and arguments before D.B on 19.08.2022 at camp court A/Abad.



Fareeha Paul  
Member (E)  
Camp Court A/Abad.

11.10.2021

Appellant in person present and requested for adjournment on the ground that his counsel 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

Counsel for the appellant present. Preliminary arguments have been heard.

The appellant is one among others who were appointed as PST in BPS-12 on 15.02.2013 in pursuance to the mandate of Khyber Pakhtunkhwa Act XVII of 2012 and the judgment of the Hon'ble Peshawar High Court Abbottabad Bench dated 17.01.2013. He according to the prayer set up in the Memorandum of appeal seeks grant of all consequential benefits from the date of termination i.e. 28.07.1997 to the date of order dated 15.02.2013. The claim as set up by the appellant is undefined as to nature of consequential back benefits. Section 5 of the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 provides that a Sacked employee appointed under Section 3 shall not be entitled to any claim of seniority, promotion or other back benefits and his appointment shall be considered as fresh appointment. Having regard to scope of Section 5 only question for the purpose of back benefits remains arguable whether the service rendered by the appellant in-between the date of his appointment and date of fresh appointment in pursuance to law is countable for pensionary benefits or not. In wake of this question, let the appeal be formally heard. The appeal is admitted for full 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 19.01.2022 before S.B at camp court, Abbottabad.

Appellant Deposited  
Security & Process Fee

04/01/22



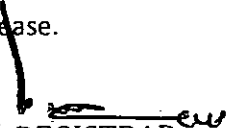


Chairman  
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 3496/2021 \_\_\_\_\_

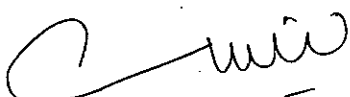
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/03/2021	<p>The appeal of Mr. Masoom Khan resubmitted today by post through Mr. Abdul Aziz Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	3-6-21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16-7-21</u> Notices be issued to appellant/ counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
	16.07.2021	<p>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.</p> <p>Fresh notices be issued to appellant/counsel for preliminary hearing on 11.10.2021 at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman</p>

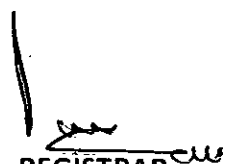
The appeal of Mr. Masoom Khan son of Muhammad Naqab DM Akhunzada District Battagram received today i.e. on 18/02/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Appeal has not been flagged/marked.
- 3- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 371 /S.T,

Dt. 18/02 /2021

  
Mr. Abdul Aziz Khan Adv.  
High Court Abbottabad.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

**BEFORE THE SERVICES TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ / 2021

Masoom Khan Son of Muhammad Naqab, Resident of Banda Akhunzadgan,  
presently serving as DM BPS-15, Tehsil and District Battagram.

*Appellant*

Versus

Secretary, Education, Khyber Pakhtunkhwa, Peshawar and Others.

... Respondents

*Service Appeal*  
~~WAKALAT~~

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4	Copy of the order termination	7	"B"
5	Copy of appointment letter dated 15/02/2013	8	"C"
6	copy of the office order no 7970-75 dated 26-02-2013	9	"D"
7	Copy of departmental Appeal and attachments	10	"E"
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PETITIONER

Through,

(ABDUL AZIZ TANOLI)  
Advocate High Court  
Abbottabad

(Adeel Ahmed Nazir)  
Advocate High Court  
Abbottabad.

Dated 15-02-2021

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**BEFORE THE SERVICES TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

3496  
Service Appeal No. \_\_\_\_\_ / 2021

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 2940

Dated 18/2/2021

Masoom Khan Son of Muhammad Naqab, Resident of Banda Akhunzadgan,  
presently serving as DM BPS-15, Tehsil and District Battagram.

.....Petitioner

Versus

- 1 Government of Khyber Pakhtunkhwa, through secretary elementary and secondary education Peshawar.
- 2 Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3 District Education Officer elementary and secondary education male primary Battagram.
- 4 District Account Officer Battagram.

.....Respondents

SERVICE APPEAL UNDER SECTION-4 OF  
KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL ACT, 1974, THAT THE  
APPELLANT IS WORKING IN THE  
RESPONDENTS DEPARTMENT AND HIS  
SERVICES WERE TERMINATED ON  
28/07/1997. THEREAFTER UNDER THE  
KHYBER PAKHTUNKHWA ACT XVII 2012  
AND IN THE LIGHT OF JUDGEMNT PASSED  
BY PESHAWAR HIGH COURT ABBOTTABD  
BENCH DATED 17/01/2013 THE APPELLANT  
WAS APPOINTED AS PST IN BPS-12, VIDE  
ORDER DATED 15/2/2013 THE APPLANT IS  
ENTITLED FOR BACK BENEFITS FROM THE  
DATE OF TERMINATION I.E 28/07/1997 TO

**Filed to-day**  
S.W.  
**Registrar**  
18/2/2021

**Re-submitted to -day  
and filed.**

**Registrar**  
10/3/2021

THE DATE OF ORDER DATED 15/02/2013  
BUT THE RESPONDENTS DID NOT GRANT ALL  
CONSEQUENTIAL BACK BEEFITS FROM THE  
DATE OF TERMINATION TILL THE ORDER  
DATED 15/02/2013 WHICH IS AGAINST THE  
PROVISIONS OF SAID ACT,AS WELL AS  
DISCRIMINATION AS OTHER DEPARTMENTS  
ALLOWED THE BACK BNEFITS TO THE  
OTHER EMPLOYEES AS WELL AS THE  
CONDUCT OF RESPONDENTS TOWARDS  
THE APPELLANT IS ILLEGAL, MALAFIDE,  
ULAWFUL, WITHOUT LAWFUL AUTHORITY  
,WITHOUT JURISDICTION, ARBITRARY  
,PERVERSE, HARSH , VOID ABNITIO AND  
AGAINST THE PRINCIPLES OF NATURAL  
JUSTICE HENCE INEFFECTIVE UPON THE  
RIGHTS OF THE APPELLANT.

PRAYER: ON ACCEPTANCE OF THE  
INSTANT APPEAL, THE APPELLANT MAY  
KINDLY BE GRANTED ALL CONSEQUENTIAL  
BACK BENEFITS FROM THE DATE OF  
TERMINATION I.E 28/07/1997 TO THE  
DATE OF ORDER DATED 15/02/2013, AND  
THE INTERVENING PERIOD MAY KINDLY BE  
ORDERED TO BE COUNTED FOR THE  
PURPOSE OF PENSIONARY BENEFITS. ANY  
OTHER RELIEF WHICH THIS HONOURABLE  
TRIBUNAL DEEMS FIT AND PROPER IN THE  
CIRCUMSTANCES OF THE CASE MAY ALSO  
BE GRANTED.

Respectfully Sheweth,

The petitioner very humbly submits as under:



1. That the Appellant is resident of District Battagram was appointed as DM (BPS-15) GPS , Chinow District Battagram in on 16-04-1996. (Copy of Appointment Order no 8244-49 dated 16-04-1996 is attached as annexure "A")
2. That the appellant was terminated by the respondent no-3, without any justification on.(Copy of the order termination is attached and marked as annexure-"B")
3. That the appellant was appointed as DM in BPS -15 in the light Khyber Pkhtunkhwa act XVII 2012 and the judgment of Honourable High court Peshawar Abbottabad bench dated 17/012013 by the respondents department vide appointment order dated 15/02/2013. (Copy of appointment letter dated 15/02/2013 attached and marked as annexure "C")
4. That appellant is serving the respondents department with due diligence till date.
5. That the respondents vide order dated 26/02/2013 withdrew the conditions mentioned in the serial no.10 of order dated 15-02-2013.( copy of the office order no 7970-75 dated 26-02-2013 is attached and marked as Annexure "D")
6. That appellant requested the respondent no-3 representation to release all the back benefits as the appellant entitled for but so far no heed has paid to the grievances of the appellant and not decided the representation yet.(Copy of the Departmental representation is attached and marked as Annexure "E")
7. That, feeling aggrieved from the conduct of the respondents appellant approaches this honorable tribunal for redressal of his grievances on the following amongst other grounds.

GROUND:

- a. That once the Government allowed the back benefits then the department /respondents are bound to release the same to the appellant.
- b. That, impugned order 7804-10 of respondent is against the law, as the intervening period has to be counted for the purpose of pensionary benefits hence serial no-2 of

terms and conditions of the impugned order, being unlawful is liable to be struck down.

- c. That it is settled principle of administrative law that when law prescribe something to be done in particular manner, that must be done that manner and not otherwise.
- d. That appellant has been allowed all back benefits vide office order dated 26/02/2013, after that respondent's deviation from their own commitment is against the law and fact.
- e. That the respondents department led the appellant to the place which is utterly, unknown to principles of jurisprudence, natural justice.
- f. That, other departments allowed back benefits to others employees as well, while ignoring the appellant by not allowing back benefits amounts to discrimination which is against the fair play and good governance.
- g. That the appellant is well qualified to hold the said post. (Copy of educational record is attached as annexure "F")
- h. That others grounds will be agitated with the permission of this honorable tribunal at the time of arguments.

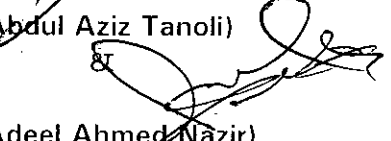
**PRAYER:** on acceptance of the instant service appeal the appellant may kindly be granted all consequential back benefits from the date of termination i.e. 28/07/1997 till the order dated 15/02/2013, and the intervening period may kindly be ordered to be counted for the purpose of pensionary benefits. Any other relief which this honorable tribunal deem fit and appropriate in the circumstances of case may kindly be allowed.

Dated 15-02-2021

  
Appellant

Through:

  
(Abdul Aziz Tanoli)

  
(Adeel Ahmed Nazir)  
Advocates High Court  
Abbottabad.

**VERIFICATION:**

Verified on oath that the contents of foregoing Service Appeal are true and correct to the best of my knowledge and belief and nothing has been mis-stated or concealed from this Honourable Tribunal.

Dated 15-02-2021

APPELLANT



5

**BEFORE THE SERVICES TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ / 2021

Masoom Khan Son of Muhammad Naqab, Resident of Banda Akhunzadgan,  
presently serving as SPST, Tehsil and District Battagram.

...Petitioner

Versus

Government of Khyber Pakhtunkhwa through, Secretary Education,  
Peshawar and Others.

...Respondents

**SERVICE APPEAL**

**AFFIDAVIT**

I, Masoom Khan Son of Muhammad Naqab, Resident of Banda Akhunzadgan,  
presently serving as SPST, Tehsil and District Battagram (Appellant), do hereby  
affirm and declare 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 Honourable Court.

Dated: 15-02-2021



*Masoom Khan*  
DEPONENT

6

OFFICE OF THE DIV: DIRECTOR OF EDUCATION (SCHOOLS) HAZARA DIVISION ABBOTTABAD.

Annexure 'A'

APPOINTMENT

Mr/Miss/Mrs Muhsom Khan Sex/Daughter of

Muhammad Haqab Resident of Banda Akhoon Zadgan  
District Battagram is hereby appointed as GM S Runkhail Battagram  
in BPS9

Rs. 1605/- Fixed P.M fixed with effect from the date of taking over charge in their interest of public service on the following terms and conditions:-

1. The appointment is purely on temporary basis and liable to termination at any time with out notice or assigning reasons.
2. He/She should produce his/her age and health certificate from the concerned Medical Superintendent.
3. The Head of institution/office concerned is required to check all the original educational qualification and professional qualification certificates before handing over charge.
4. The Head of institution/office is required to get verified his/her certificates from Board/University Registrar concerned.
5. Appointment of trained candidate who passed their professional Exam: from other than NWFP is provisional & subject to the verification of certificates.
6. In case he/she wishes to resign from service he/she will have to give one month's prior notice or forfeit one month's pay in lieu of short notice.
7. The appointment shall stand automatically cancelled if he/she failed to join the post within 15 days of the issue of this order.
8. Special relaxation of upper age limit for 2 years has already been allowed vide Govt: of NWFP, S&GAD letter No. SOS-III(S&GAD)B(4)94, dated 17.7.74.
9. NO TA/DA is allowed on 1st appointment.
10. Charge reports should be sent to all concerned.
11. They should not be handed over charge if his/her age exceeds 27 years or it is below 18 years.

DIVL: DIRECTOR OF EDU: (S)  
HAZARA DIVISION ABBAD.

Endst: No. 8244-48

Dated A. Abad the 16/4/96

Copy of the above is forwarded to the:-

1. F/S to Minister of Edu: (S/C) NWFP Peshawar.
2. Director of Secy: Edu: NWFP Peshawar.
3. District Edu: Officer (M/F) Secy: GM S Runkhail Battagram
4. Principal/Headmaster
5. Headmistress Battagram District Account Officer
6. Candidate concerned. 7. ADEO (E) Local Office. 8. Office order file.

FOR DIVL: DIRECTOR OF EDU: (S)  
HAZARA DIVISION ABBOTTABAD.

*Attested*  
*15/4/96*

⑤

**OFFICE OF THE DISTRICT EDUCATION OFFICE MALE BATTAGRAM**

OFFICE ORDER No: \_\_\_\_\_

DATED: 28-7-1997

*Annexure "B"*


**OFFICE ORDER**

In the light of findings of the inquiry Committee and in compliance with Memo No. P No. 33/DEP/ExA Maqbool Ur Rehman (DEO Male) Battagram/AD(ExA) No (M) No. \_\_\_\_\_ 33499 Dated 25/07/1997.

The appointment of the following person above been found illegal abinitio void and against prescribe roles. Their service are therefore, dispen sated with with effect from the date of their replacement by their as located on purely merit basis in the light of following the selection procedure on admissible under the roles.

However, they can apply afresh along with others for their selection on merit.

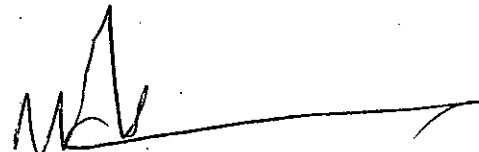
S.No	Name of Person	Father name	Designation	Name of School
1	Masoom Khan	Muhammad Niqab	DM	GMS Rupkani


  
(Maqbool Ur Rehman)  
District Education Office (Male)  
Battagram

Endst No. 1375-79 Dated Battagram the 28/7/1997

Copy of the above are submitted to

1. Director Education N.W.F.P Dabgari Gardan Peshawar.
2. F.B to Secretary of Education N.W.F.P Peshawar .
3. Head Master GMS Rupkani Allai
4. District account Officer

  
(Maqbool Ur Rehman) ✓  
District Education Office (Male)  
Battagram

*Attested*  
*15/7/20*  


8

Annexure 11/20

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.

**ORDER**

Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent authority (Deputy Commissioner) Battagram, in the light of Khyber Pakhtunkhwa Sacked employee Act XVII 2012 and Honorable Court Judgment Peshawar High Court Abbottabad Bench dated 17-01-2013 the following candidates are hereby appointed as DM in BPS 15 (Rs:8500-700-29500) plus usual allowances as admissible under the rules against the vacant post at the school mentioned against each in the interest of public service with effect from the date of his taking over charge.

S. No	Name of Candidates	Father's Name	Address	Posted at	Remarks
1	Muhammad Iqbal	Muhammad Younis	Bhatian Battagram	GMS Soorgai	Against V/Post
2	Masoom Khan	Niqab Khan	Gijbori Battagram	GMS Nehar	Against V/Post

**NOTE** All the Drawing and disbursing officer are directed to verify theirs Degrees/Certificates from the concerned Board/University/Institutions from the quarter concerned.

**TERMS AND Conditions:-**

- 1 The appointment is made purely on temporary basis and liable to termination at any time without assigning any reason or notice.
- 2 Theirs service will be on regular basis but not pension able and they will contribute to CP Fund.
- 3 They will be abide by the rules and regulation issued from time to time by the Provincial Govt.
- 4 Their appointment has been made in the Act of Sacked Employees Appointments Act, No XVII, 2012.
- 5 They should obtain Medical fitness Certificate from the Medical Superintendent DHQ Hospital Battagram.
- 6 In case of resignation
- 7 The candidates having less qualification will acquire requisite training and obtain FA qualification within three years failing which their appointment shall stand terminated automatically.
- 8 They should take over charge within 15 days after the issuance of this appointment order otherwise the order of appointment shall stand cancel after 15 days.
- 9 Charge report should be submitted to all concerned.
- 10 The DDO is directed to obtain an affidavit on stamp paper duly attested by the 1st Class Magistrate that,
  - (a) They will served the Education department for more then five (5) year countinously.
  - (b) They are not served any other Department/Corporation/Agency.
  - (c) Their previous services if any will be treated as EOL. (without Pay).
  - (d) They will not go in the court for their previous service benefits.
- 11 No TADA etc is allowed to any one.

**DEPUTY COMMISSIONER (CHAIRMAN)  
BATTAGRAM**

Endst: No 7804-10 /EB/AE-II/ Appt: Sacked: Eimp: DATED 15/02/ /2013

- Copy for information and necessary action to the:
- 1 Deputy Commissioner Battagram.
  - 2 Registrar Honorable High court Peshayar
  - 3 District Accounts Officer Battagram..
  - 4 Head Master concerned School..
  - 5 D.D.E.O (Male) Battagram.
  - 6 Candidates concerned.
  - 7 Office file.

*[Signature]*  
Assistant District Education Officer  
Litigation Battagram

*[Signature]*  
15/2/21

(9)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM.

OFFICE ORDER:-

Annexure "D"

Serial No. 10 of the terms and conditions mentioned in the Sacked employees appointments orders bearing Endst: No. 7825-31 dated 15-02-2013 is hereby withdrawn.

The remaining order will stand intact and unchanged.

DISTRICT EDUCATION OFFICER  
(MALE) BATTAGRAM.

Endst: No. 7958-63 / MB/AE-II/F-Sacked Emp: Apptt: dated 26/02/2013.

Copy for information to the:-

1. Deputy Commissioner Battagram.
2. Registrar High Court Bench Abbottabad.
3. District Accounts Officer Battagram.
4. Headmaster/ Head Teachers concerned schools.
5. Candidates concerned.
6. Office copy.

*[Signature]*  
DY: DISTRICT EDUCATION OFFICER  
(MALE) BATTAGRAM.

*[Redacted area]*

*Musteeh*  
*15-4-21*  
*[Signature]*

خدمت مناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب منگلور ضلع منگلور

عنوان: درخواست اپیل برائے ادائیگی کے بارے میں BACK BENEFIT

(1) یہ کہ سائل کو محکمہ تعلیم میں بطور D.M گورنمنٹ لٹریری سکول ضلع منگلور میں بھرتی کیا گیا۔ اس دوران سائل اپنی ذمہ داریاں احسن طریقے سے سرانجام دیتا رہا۔ اور وہی بھی غیر ذمہ دارانہ رویے کا مظاہرہ نہ کیا۔

(2) یہ کہ سائل نے اپنی تمام ذمہ داریاں امانتداری سے سرانجام دیں اور سائل کو مورچہ 1997-07-28 کو بلا سب وجہ سے سکول سے برخاستہ کر دیا گیا اور درخواستی کے دوران سائل نے کبھی کسی حکمہ میں نوکری یا ملازمت نہ کی۔

(3) سائل کو لیسٹ اور ہائی کورٹ ایپلےٹ آباد بینچ نے مورچہ 17/2013 کو دوبارہ بھرتی کرنے کے احکامات صادر کیے اور عدالت عالیہ نے فیصلے اور Sacked employee ایکٹ 2012 KPK XVII کی روشنی میں دوبارہ بھرتی کرنے کے احکامات صادر کیے اور دوبارہ مورچہ 2013-02-15 کو دوبارہ بھرتی کر دیا گیا اور سائل کو محکمہ کی طرف سے Back Benefits بھی نہ دیئے گئے۔ سائل ایک غیر سب سٹف ہے دو غیر لوٹی ذریعہ آمدنی رہتا ہے اور سائل ملازمت سے فارغ ہونے کے عرصہ سے لے کر دوبارہ بھرتی ہونے تک کے عرصہ میں بے روزگار رہا ہے اور سائل کو گورنمنٹ کی طرف سے کوئی Back Benefits نہ دیئے گئے ہیں نیز مطالبہ آرڈر نمبر 63-7958 مورچہ 2013-02-26 کی روشنی میں سائل کو Back Benefit کا حق درج ہے۔

صواب علیہ آپ سے درخواست ہے کہ سائل کو قلمدہ احکامات کے مطابق ادائیگی جائیں۔

سائل الملحقہ معروضی خان 11/2020  
Mash

Admitted  
15/7/21



11

Annexure 11 F 3

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



Serial No 830123 Roll No. BG606180  
 Name MASOOM KHAN Registration No. 07NMN01622  
 Final Semester SPR-2016  
 Father's Name MUHAMMAD NIQAB  
 Address C/O SYED HALEEM SHAH SHOPKEEPER ITIFAQ MARKET  
 Tehsil BATTAGRAM  
 District BATTAGRAM



has successfully completed BACHELOR OF EDUCATION (B.ED)

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 15	0512	PERSPECTIVE OF EDUCATION	100	59
AUT- 15	0513	SCHOOL ORGANIZATION	100	65
AUT- 15	0514	EVALUATION, GUIDANCE & RESEARCH	100	70
AUT- 15	0518	EDUCATIONAL PSYCHOLOGY	100	66
AUT- 15	0651	ENGLISH (COMPULSORY)	100	55
AUT- 15	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	62
SPR- 16	0517	TEACHING OF PAKISTAN STUDIES	100	58
SPR- 16	0654	ISLAMIAT AND ITS TEACHING	100	64
SPR- 16	0655	WORKSHOP	100	90

Total Credits 6  
 Result Declared on JANUARY 17, 2017  
 Date of Issue FEBRUARY 01, 2017  
 Total Marks/Obtained 900 / 589  
 Percentage/Grade 65 / B

*Mansoor*

Controller of Examinations

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

12

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 460905

PROVISIONAL RESULT CARD

Name: NASOON KHAN
Father's Name: MUHAMMAD NIGAB
Address: C/O SHAFI UR RAHMAN CLOTHHOUSE AL SYED
MAR KET BATTAGRAM P. O BATTAGRAM

Roll No. AQ483873
Registration No. 07NMNO1622
Final Semester SPR-2014

Tehsil: BATTAGRAM
District: BATTAGRAM
has successfully completed BACHELOR OF ARTS
GROUP-GENERAL

The detail of passed courses is as under:

Table with 5 columns: Semester, Course Code, Title of Course, Maximum Marks, and Obtained Marks. It lists 14 courses with their respective marks.

CREDITS: 8

Total Marks / Obtained

1400 / 862

Result Declared on FEBRUARY 26, 2015

Percentage / Grade 62 B

Date of issue MARCH 5, 2015

Signature of Controller of Examinations

Controller of Examinations

Disclaimer:

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

13

Book No:

25

Sr. No:

2431



INSPECTOR OF DRAWING EXAMINATION FOR SINDH DIRECTORATE OF SCHOOLS EDUCATION

HYDERABAD REGION HYDERABAD

MARKS CERTIFICATE

CENTER SHS Tana Ali Hyderabad

Name of Examination: ELEMENTARY / INTER GRADE DRAWING 2015

Name of Candidate: Nasoom Khan Seat No: "3382"

S/o, D/o Muhammad Nisab - B/C -

Examination Held in the Month of Jan Session 2015

SUBJECTS	MAX. MARKS	MARKS OBTAINED
Object Drawing	100	71
Geometry & Lettering	100	60
Nature Drawing	100	70
Memory Drawing	100	68
Design	100	75
Free Hand Drawing	100	60
<b>TOTAL</b>	<b>600</b>	<b>404</b>

**RESULT**  
 ✓  
 Grade / Division:  
"B"

Result Declared on 20.2.2015

Date of Issue 23.2.2015

Prepared on [Signature] Checked by [Signature]

Controller  
Inspector of Drawing Grade  
Examinations For Sindh Directorate of Schools  
Education Hyderabad.

Book No: 36

Sr. No: 3595

14



INSPECTOR OF DRAWING EXAMINATION FOR SINDH DIRECTORATE OF SCHOOLS EDUCATION

HYDERABAD REGION HYDERABAD

**PASS CERTIFICATE**

CENTER THS Kama Ali Hyderabad

**ELEMENTARY / INTER GRADE DRAWING EXAMINATION 2015**

Seat No: "3382"

Certified that No. Soom Khan

Son / Daughter of Tuhamma Nifab B/C -

having successfully completed the course during the Academic Session 2015

passed ~~Elementary~~ /  Inter Grade Drawing Examination

held in Jam He/She was placed in "B" Division/Grade

He/She was Examined in the following subjects.

- 1. Nature Drawing.
- 2. Geometry & Lettering.
- 3. Object Drawing.
- 4. Memory Drawing.
- 5. Design.
- 6. Free Hand Drawing.

He/She obtained distinction in \_\_\_\_\_

Result Declared on 20. 02. 2015

Date of Issue 23. 2. 2015

Prepared by [Signature] Checked by [Signature]

Controller  
Inspector of Drawing Grade  
Examinations For Sindh Directorate of Schools  
Education Hyderabad.


S.N. 04091

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

15

Roll No. 66285

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan**  
**PROVISIONAL CERTIFICATE**  
**SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
 Session 19-89 Annual/Supplementary

THIS IS TO CERTIFY THAT Moslem Ichan  
 Son/Daughter of Mohammad Hiqab  
 and a candidate of Manshra Desoff  
 has passed the Secondary School Certificate Examination of the  
 Board of Intermediate & Secondary Education, Peshawar held in Aug 19 89  
 as a Regular/Private candidate. He/She obtained 416 Marks out of 850 and has  
 been placed in Grade (D) Representing Fair

The candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat
4. Pak. Studies
5. Math
6. Physics
7. Chemistry
8. Biology

Internal assessment Grade awarded by the institution concerned is (6)

Date of Birth according to admission form is First October

One thousand nine hundred and Seventy Only (1-10-1970)

Prepared by M

Checked by \_\_\_\_\_

Date of Preparation \_\_\_\_\_

Manshra Desoff  
 Asstt. Secretary (Cert)  
 Asstt. Secretary (Certificates)

16

786

41669

S.B. /PC

Roll No. 28464

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



Peshawar N.W.F.P: Pakistan  
**PROVISIONAL CERTIFICATE**  
 INTERMEDIATE EXAMINATION

Session 91 Annual/Supplementary

Arts Group

THIS IS TO CERTIFY THAT

Masoom Khan

Son/daughter of

Mohammad Nigab

and a candidate of

Maneetra Ditta

Registered No. 1 has passed the INTERMEDIATE EXAMINATION of the

Board of Intermediate & Secondary Education, Peshawar held in Jan 19 92

as a Regular/Private candidate. He/She obtained 437 Marks out of 1100 and

has been placed in Grade (E) Representing

Satisfactory

The Examination was taken as a whole/in parts.

Prepared by

[Signature]

Checked by

[Signature]

Asstt. Secretary (certificates)

Date of Preparation

2

Sc. No 194835

17

**Board of Intermediate & Secondary Education  
PESHAWAR**

**DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(SCIENCE GROUP)**

Session 19 89 (Annual/Supplementary)

Name Masoom Khan

Father's Name Muhammad Nigal Roll No. 66285

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	51	
2. Urdu	150	88	
3. Islamiyat Comp.	75	53	
4. Pakistan Studies	75	45	
5. Mathematics	100	36	
6. Physics	100	43	
7. Chemistry	100	59	
8. Biology	100	41	
<b>Total</b>	<b>850</b>	<b>416</b>	<i>four hundred sixteen</i>

This certificate is issued errors and omissions excepted.

Prepared by [Signature]

Checked by [Signature]

Date 158 19     

Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR

18

# Board of Intermediate & Secondary Education PESHAWAR

**DETAILED MARKS CERTIFICATE**  
Intermediate Examination Humanities Group  
SESSION 19 9/ (Annual/Supplementary)



Sr. No. 227763

Name Masoom Khan

Father's Name Mohd Nazim Roll No. 28464

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			72	
2. Urdu	200			72	
3. Islamic Education	50			62	
4. Pakistan Studies	50			67	
5. <u>Ar</u>	200			61	
6. <u>Per</u>	200			103	
7. <u>Per</u>	200				Ans. Method
<b>Total</b>	<b>1100</b>			<b>437</b>	<b>E. Mistry Sena</b>

Note : Errors/Omissions excepted.

Date \_\_\_\_\_ 19 \_\_\_\_\_

*[Signature]*  
Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR

Prepared by *[Signature]* Checked By \_\_\_\_\_



# وکالت نامہ

کورٹ فیس

قیمت

19

بعدالت جناب سروس سیمینل سٹیٹ لٹریچر بورڈ مسٹر مسٹر مسٹر مسٹر  
حضور خان بلا منجاب شکریہ اور شکر و غیرہ

دعویٰ یا جرم میرزا اسلم باعث تحریک آنکہ

مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوہدی: عبدالغفور منٹولی عبدالغفور  
 مقام۔ مسٹر مسٹر بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت  
 حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر  
 حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ  
 ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے  
 یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر یا بروز پکھری کے  
 اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ داریاں اسکے واسطے کسی معاوضہ ادا کرنے مختار نامہ  
 واپس کرنے کے بھی صاف و موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرداختہ صاحب مثل کردہ ذات خود منظور  
 قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم  
 کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراءے اور ہر قسم کاروبار  
 وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد دہائی و راضی نامہ و فیصلہ بر خلاف کرنے و  
 اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری ایک طرفہ درخواست حکم امتناعی یا  
 ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کر بشرط ادائیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا۔ ار  
 بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر  
 قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیش سے پہلے ادا نہ  
 کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب  
 موصوف کے برخلاف نہیں ہوگا لہذا مختار نامہ لکھ رہا ہے کہ سندر ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح  
 سمجھ لیا ہے اور منظور ہے۔

موصوف خان

*(Handwritten signature)*

الرقوم: 12021-12-15

Accepted by me  
*(Handwritten signature)*

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

APPEAL No. 3496 of 20 21

TB

Masoom Khan & Others  
Appellant/Petitioner

Versus

Through Secy. Edu. K.P.S. Pesh.  
RESPONDENT(S)

Notice to Appellant/Petitioner

Masoom Khan & M. Nagrb  
Presently serving as DM BPS-15 Teh. 2 Distt.  
Bathagram

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 11-10-2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at Camp Court Abbottabad

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.