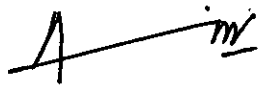


FORM OF ORDER SHEET

Court of _____

Appeal No. 1078/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	15/05/2023	<p>The appeal of Mr. Mustafa Khan resubmitted today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on-</p> <p>By the order of Chairman  For REGISTRAR</p>

The appeal of Mr. Mustafa Khan PTC GPS Amno Khel Ghallanai District Mohmand received today i.e. on 05.05.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Annexures G & H of the appeal are illegible which may be replaced by legible/better one.

No. 1348 /S.T.

Dt. 8/5 /2023.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv.
High Court Peshawar.

① All the objection clear and resubmitted
② Grand H of appeal resubmitted

[Handwritten Signature]

15/5/23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1078 /2023

Mustafa Khan

V/S


EDU Deptt:

INDEX

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-06
2.	Copy of 1 st appointment order	- A -	07-09
3.	Copy of regularization-order	- B -	10-11
4.	Copy of pay slip	- C -	12
5.	Copy of writ petition	- D -	13-18
6.	Copy of judgment	- E -	19-20
7.	Copy of application	- F -	21-22
8.	Copy of rejection	- G -	23
9.	Copy of notification	- H -	24-25
10.	Vakalat Nama	-----	26


APPELLANT

THROUGH:


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT.

RESPECTFULLY SHEWETH

9

FACTS

1. That the appellant was initially appointed as PST Teacher in the Project Community School Teachers in the year 2003, Since the appointment the appellant is performing their duties upto the entire satisfaction of his superior Officers. **Copy of order is attached as Annexure-A.**
2. That in meantime the worthy Governor Khyber Pakhtunkhwa, in the capacity of the competent authority, notified on 11.05.2012 a policy/guidelines for accommodating the community school teacher against the available regular post. The appellant has been regularized in the year 2013 vide notification dated 30.08.2013. Since the regular appointment the appellant are continuously performing their duties upto the entire satisfaction of their superior's officers. But the salary of the appellant was started from initial pay stage and ignore all the previous service of the appellant. Despite that the initial appointment shown as 2003 in salary slip. **Copy of regularization order and salary slip are attached as Annexure-B & C.**
3. That since the appellant has more than 10 Years temporary services at their credit which was not counted towards their pay and pension protection which cost huge financial loss to the appellant.
4. That the appellant made several request but in vain therefore he filed writ petition No. 4090-P/2020 against the inaction/omission, of the respondents and not counting the previous Service of the appellant towards pay protection may be declared as illegal, unconstitutional, unlawful and violation of fundamental right. The said writ petition was finally heard on 01/10/2020 by the august Court and august Court disposed of the writ petition and treated the same as departmental appeal and transmitted to department for decision, with certain directions. **Copy of the writ petition and judgment is attached as Annexure-D & E.**
5. That thereafter obtaining copy of the judgment appellant applied to the respondents for passing appropriate order in light of the judgment of august Court, but no response but after delay more than two years the departmental appeal of the appellant was rejected vide order dated 06/04/2023 without showing any reason. **(Copy of application and rejection order is attached as annexure-F & G).**
6. That the appellant constraint to file this service in August Tribunal on the following grounds amongst others.

1 3
GROUND

- A. That the order dated 06/04/2023 and depriving the appellant from the legal right of benefits of pay protection and pensionary benefits as against the law rules norms of justice.
- B. That the depriving the appellant from the benefits of pay protection is the violation of the superior Court judgments and Pension Rules.
- C. That since the appellant has more than 10 Years temporary services at their credit which was not counted towards their pay and pension protection which cost huge financial loss to the appellant.
- D. That the inaction of the respondents and not counting their previous service of more than 10 years toward pay and pension protection is against the principle of justice fair play equity and equality.
- E. That in summary to the worthy Governor it was admitted by the respondents department that the appellant has rendered more than 10 years' service on contract basis and also Senate Standing Committee recommended the regularization of the appellant therefore they should be regularized. On the basis of that summary the worthy Governor KPK has issued notification dated 11.05.2012. therefore the appellant are legally entitled to benefits of previous service towards pay and pension fixation.
- F. That as per pension rules 2.3 the temporary and officiating service followed by confirmation/regularizations will be counted towards pension and pay protection.
- G. That this august Court has already decided writ petition No. 1188-P/2014 and 361-P/2013 wherein the previous service has been ordered to be counted towards pay and pension protection.
- H. That even in and other writ petition No. 3221-P/2013 this august Court as directed the respondents to count the previous service towards pay and pension fixation by allowing the writ petition.
- I. That the august Court has also decided a similar writ petition bearing No. 5585-P/2018 on 04.09.2019. thus the appellant are also entitled for the same relief.
- J. That the appellant are not treated in accordance with law and rules keeping in view the above referred judgments the appellant also deserve same treatment under the principle of equity and equality and consistency.


W

- K. That the pay protection was given to the some colleagues of the appellant but the same was denied to the appellant which was also discriminatory attitude of the department towards the appellant.
- L. That the inaction and not counting the previous service of the appellant toward pay and pension fixation protection, is against the principle of Article-2A, 9, 25 and 38 of the Constitution.
- M. That the appellant is entitled for pensionary benefits of the period which was rendered by the appellant on contract basis under the shelter of west Pakistan Pension rules 2.3 and under finance notification dated 06/02/2014. **Copy of notification is attached as annexure-II.**
- N. That the similarly nature service appeal decided by the Federal Service Tribunal in favor of appellant and the Supreme Court Judgment maintained the same. On the principal of consistency appellant also entitle to the same relief.
- O. That the appellant was treated according to the law and rules and was depriving from his legal right in arbitrary manner.
- P. That the appellant seeks permission to advance other ground proof at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT

THROUGH:


(SYED NOMAN ALI BUKHRI)
ADVOCATE HIGH COURT.

3

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2023

Mustafa Khan

V/S

EDU Deptt:

CERTIFICATE:

It is certified that no other service appeal carrier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

6

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____ /2023

Mustafa Khan

V/S

EDU Deptt:

AFFIDAVIT

I, Mustafa Khan, (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.


DEPONENT

A 7

OFFICE OF THE AGENCY EDUCATION OFFICER MOHMAND AGENCY AT GHALLANAI
OFFICE ORDER

Consequent upon the recommendation of the selection committee and nomination of Political Agent Mohmand Agency vide his office No.1085 -89 Dated. 20/02/2003, the following candidates are hereby appointed against PTC Posts in the community schools under president special development package in Khwaizai / Baizai inaccessible areas in BPS. 7 plus Usual allowances as admissible under the rules on contract-base for the project period in the schools noted against their names with immediate effect.

S.#	Name of candidate with Father name	School where appointed
1	Muhammad Shah S/O Musa Yar Khan	C.S. Bad Manai Ghafoor
2	Munir Khan S/O Ali Rehman	C.S Sham Shah Yousof Khan
3	Noor Ullah Khan S/O Mukaram Khan	Do
4	Dawood Shah S/O Sadrud Din	C.S Shah Mir Kore Khan Abad
5	Qadar Khan S/O Shah Jehan	Do
6	Syyar Khan S/O Amir Zada Khan	C.S.Badmanai-Gulzar
7	Ajmal Khan S/O Pir Ghulam	C.S Ghair Dhand Akram
8	Fazal-I- Subhan S/O Abdul Latif	C.S Manzari Cheena Faqir
9	Mohammad Israr S/O Mir Zada Khan	C.S Badmanai Ghafoor
10	Abdul Samad S/O Mohammad Rafiq	C.S Lakhkar Killi Gul Wali
11	Abdul Malik S/O Feroz Khan	C.S Landi Shah Zarin
12	Bashir Ahmad S/O Said Akram	C.S Lakhkar Kili Gul Wali
13	Shad Ali Khan S/O Hasham Khan	C.S Bad Manai Gul Zar
14	Sandullah S/O Haji Dawa Jan	C.S Mana Zai Sekandar
15	Nazir Gul S/O Nawab Khan	Do
16	Zaita Khan S/O Khan Syed	C.S Manzari Cheena Shinwari
17	Tajawal Khan S/O Fazal Mohammad	C.S Jarobai Fazal
18	Ahmad Khan S/O Niaz Din	C.S Masti Kore Gulab
19	Hazrat Shah S/O Sahib Jamal	C.S Kung Mehrab Gul
20	Ali Akbar S/O Hazrat Mohammad	C.S Ucha Jewara Naik Mohd
21	Sajjad S/O Khanzad Gul	C.S Kung Mehrab Gul
22	Sultan Mohammad S/O Haji Mohammad Shah	C.S Khan Baig Kore Fazal
23	Haleem Khan S/O Zarif Khan	Do
24	Samar Ahmad S/O Ahmad Gul	C.S Kuzu Kass Ghulam Bashir
25	Daftar Khan S/O Mohammad Akbar	C.S Khan Baig Kore Fazlai Manan
26	Khaista Zar S/O Ihsanullah	C.S Khan Baig Kore Fazlai Mannan

8

	Name of Candidate with Fathers Name	School where appointed
27	Jamil Shah S/O Hakeem Khan	C.S Nazar Kore Aslam
28	Aslam Khan S/O Hazrat Mohammad	C.S Ucha Jewara Naik Moinu
29	Mohammad Quraish S/O Mohammad Akbar	C.S Nazar Kore Aslam
30	Mohammad Khan S/O Ghulam Sakhi	C.S Soor Dagi Yaqub Khan
31	Raz Mohammad S/O Shah Rasool	C.S Kaka Kore Hunar Jan
32	Gul Nabi S/O Lal Said	C.S Soor Dagi Yaqub
33	Anwar Shamim S/O Ahmad Gul	C.S Kuzu Kass Ghulam Bashir
34	Ghal Zar S/O Khan Said	C.S Sam Ghakhai Siraj Khan
35	Fida Mohammad S/O Arsala Khan	Do
36	Saz Mohammad S/O Shah Rasool	C.S Kaka Kore Hunar Jan
37	Niqab Khan S/O Khan Sharif	C.S Kung Sabzali
38	Saadi Khan S/O Mawceez Khan	Do
39	Khyali Jan S/O Joor Jan	C.S Spinki Tangi Nadar
40	Amir Khan S/O Hamid Khan	Do
41	Shah Nazir S/O Arsala Khan	C.S Spinki Tangi Sikandar
42	Sultan Murad S/O Gula Dad	Do
43	Tahir Ali S/O Gula Khan	C.S Bad Manai Bakht Jamal
44	Mawad Gul S/O Hayat Gul	C.S Toora Khwa Sherin
45	Mohd Raz S/O Zarghun Shah	Do
46	Siyar S/O Dost Mohammad	C.S Gulma Haji Almas
47	Azmat Gul S/O Rahat Gul	Do
48	Liaqat Ali S/O Mumtaz Khan	C.S Atam Killi Ghulam Sarwar
49	Khuzair Khan S/O Noor Jamal	C.S Atam Killi Mohdi Gul
50	Jamal Shah S/O Habib Khan	C.S Bad Manai Bakht Jamal
51	Khanadan S/O Wazir Khan	C.S Atam Kili Ghulam Sarwar
52	Azaz Ullah S/O Ibar Khan	C.S Sham Shah Biland
53	Issa Dad Khan S/O Dula Dad	C.S Atam Kili Mohdi Gul
54	Akbar Khan S/O Sher Jan	C.S Landi Shah Zarin Khan
55	Ijaz Ali S/O Wazir Khan	C.S Badmanai Yad Mohd
56	Hussain Shah S/O Syed Mastan Shah	C.S Manzari Cheena Faqir
57	Janat Gul S/O Zulfan	C.S Ghair Dhand Akram
58	Mazullah S/O Najeeem Khan	C.S Baidmani Yad Mohd
59	Said Ahmad S/O Mohammad Afzal	C.S Manzari Cheena Shinwari
60	Mohammad Khan S/O Mohammad Wali	C.S Toor Khel Ahmad Noor
61	Irfan Ullah S/O Alqash Khan	Do
62	Pazcer Khan S/O Mohammad Hanif	C.S Khanjar Killi Malik Abid
63	Ali Gohar S/O Ajmir Khan	C.S Yara Khel Haji Madar
64	Zahir S/O Bashir Khan	C.S Khanjar Killi Malik Abid
65	Sakhi Jan S/O Izzat Gul	C.S Jarobi Fazal
66	Zahid Ullah S/O Najeeem Khan	C.S Sham Shah Biland
67	Ghulam Said S/O Noor Siad	C.S Jarobi Abdullah
68	Bad Shah Hassan S/O Ibrahim Shah	Do
69	Shah Jehan S/O Shamroz Khan	C.S Shamrad Khel Noor Zada
70	Liaqat Ali S/O Ikram Khan	Do
71	Asif Khan S/O Jamal Khan	C.S Majm Khel Malik Islam Bacha

	Name of Candidate with Fathers Name	School where Appointed
72	Saddar Shah S/O Mir Zaman Khan	
73	Sartaj S/o Mahboob Khan	
74	Mohammad Nasser S/O Ghani Khan	C.S Maim Khel Malik Islam Bacha
75	Asal Khan S/O Saidan Khan	C.S Yara Khel Haji Madar
76	Faz Khan S/O Badam Khan	C.S Muia Khel Toora Tangi Ayub
77	Ajmal Khan S/O Harifullah	Do
78	Darwaish Khan S/o Gul Said	C.S Shakar-Khel Khatam Jan
79	Mustafa Khan S/O Wasil Khan	Do
80	Arif Shah S/O Rahil Shah	C.S Ughazado khel Farooq
81	Shah Bad Shah S/O Hazrat Bad Shah	Do
82	Mohammad Hazeer S/O Hazrat Bad Shah	C.S Abdul Khel Hingar M. Amin
83	Sulbat Shah S/O Amir Khisro	Do
84	Ihsan Ullah S/O Gul Alam	C.S Sana Khel Yaqub
85	Kirammat Shah S/O Musharaf Shah	Do
86	Dawood Shah S/O Sulman Shah	C.S Abdul Khel Saeed Ullah
87	Fazlai Dayan S/O Sadrud Din	Do
88	Muzafar Khan S/O Zaman Khan	C.S Matina Malik
89	Fazlai Subhan S/O Mirza Hakeem Sadrud Din	C.S kankar Killi M. Farid Ullah
90	Yousaf Khan S/O Syed Rahman	C.S Dag Killi Syed Qahar
91	Abdul Malik S/O Said Mohammad Shah	C.S Masti Kore Masahib Khan
		C.S Zoor Killi
		C.S Lakhka Killi Faiz Ali

TERMS/CONDITIPONS:-

- 1:- The appointments of the Teachers are made on temporary basis and liable to termination without any notice/assigning any reasons.
- 2:- They should produce their Health and Age certificates from the Agency Surgeon Mohmand Agency at Ghallanai.
- 3:- Charge report should be submitted to this office in duplicate with in a specific period.
- 4:- If the candidates/Teachers failed to report of their arrival to the concerned schools within fifteen days(15) their orders will be automatically considered as cancelled.
- 5:- Academic qualification is must to be verified.

(HAJI GUL RAHMAN)
Agency Education Officer
Mohmand Agency at Ghallanai.

Endst No. 4993-5089 Dated 06/02/2003.

Copy of the above is forwarded to the:-

- 1 Director of Education, FATA, NWFP, Peshawar.
- 2 Political Agent Mohmand Agency at Ghallanai w/r his office memo No. as cited.
- 3 Agency Surgeon Mohmand Agency at Ghallanai.
- 4, Asstt: Political Agent (Upper Mohmand) at Ghallanai.
- 5, Agency Accounts Officer, Mohmand Agency at Ghallanai.
- 6, Acctt/Pay Clerk in local office.
- 7-97 Candidates concerned.

6/2/2003
Agency Education Officer,
Mohmand Agency at Ghallanai.

B (A3)

OFFICE OF THE AGENCY EDUCATION OFFICER MOHMAND AGENCY AT CHALLANAI

REGULARIZATION OF COMMUNITY TEACHERS.

Consequent upon the notification No.SO(E)/SSD/CSCR 99-108, dated 11.5.2012, Adjustment order of 19 community teachers of functional Community Schools is hereby ordered against regular PST posts in BPS-07 in the schools mentioned against their names in the interest of public service w.e.f 1.9.2013, on the basis of Court decision dated 6.8.2013.

Note:- The candidates/teachers who have not acquired the required qualification for PST post i.e FA and PTC are directed to acquire the requisite qualification within 24 months after the issuing date of this order, otherwise adjustment of such like candidates will be considered as cancelled and they will be terminated.

S. No	Name with Father's Name	Name of Community School	Station of Posting Regular PST	Tehsil	Remarks
1	Jan Nisar S/O Sarzamin Khan	BCS Bahlola	GPS Kamangara	Ambar	Vacant Post
2	Shad Ali S/O Hasham Khan	BCS Baidmanai Yad Muhammad	GPS Toor Kore	Baizai	Vacant post
3	Abdul Malik S/O Feroz Khan	BCS Zabri Jour	GPS Zabri Jour	Baizai	Newly created post
4	Zauta Khan S/O Khan Said	BCS Zabri Jour	GPS Zabri Jour	Baizai	Newly created post
5	Issa Dad S/O Guladad	BCS BCS Koda Khel Kahir Bandi	GPS Spinki Tangi	Halimzai	Newly created post
6	Naseer Khan S/O Abdur Rahman	BCS Koda Khel Kahirbandi	GPS Shamshah Guno	Halimzai	Newly created post
7	Irfanullah S/O Alqash Khan	BCS Khanjar Killi	GPS Toor Khel	Halimzai	Newly created post
8	M.Nasir Khan S/O Ghani Khan	BCS Spinki Tangi Nadar	GPS Shamsha Guno	Halimzai	Newly created post
9	Sartaj S/O Mahboob Khan	BCS Khan Baig Fazle Manan	GPS Qamardin	Halimzai	Vacant post
10	Amir Khan S/O Said Muhammad	BCS Koda Khel Haji Gulab	GPS Akram Baig	Halimzai	Vacant post
11	Ghulam Said S/O Noor Said	BCS Zoor Killi Aflatoon	GPS Spinki Tangi	Halimzai	Newly created post
12	Raz Muhammad S/O Shah Rasool	BCS Bakhshi Kore Hunar	GPS Sana Khel	Khwezai	Newly created post
13	Ikramullah S/O Muhammad Sharif	BCS Kung Sabzali Jalal Kore	GPS Atam Killi	Khwezai	Newly created post
14	Saz Muhammad S/O Shah Rasool	BCS Bakhshi Kore Hunar	GPS Sana Khel	Khwezai	Newly created post

15	Shah Nazar S/O Arsala Khan	BCS Spinki Tangi Sikandar	GPS Kharai Dara No.2	Khwezai	Vacant post
16	Siddi Khan S/O Maweez Khan	BCS Koda Khel Dag Qalla	GPS Bahadar Kilii	Khwezai	Vacant post
17	Khiali Jan S/O Noor Jan	BCS Spinki Tangi Nadar	GPS Toor Khel	Khwezai	Newly created post
18	Mustafa Khan S/O Wasil Khan	BCS Toora Khwa Sherin	GPS Amino Khel	Pandiali	Vacant post
19	Ahmad Khan S/O Niazuddin	BCS Koda Khel Haji Gulab	GPS Serai	Prang Ghar	Vacant post

TERMS AND CONDITIONS.

- All terms & conditions will remain the same, meant fro new appointment, other than the age nature.

(SAID MUHAMMAD)
Agency Education Officer
Mohmand Agency at Ghallanai.

Endst No. 11053-50 Project/ Appointment
Copy of the above is forwarded to the:-

Dated 30/8 /2013

- PA to Secretary to Governor KPK, Peshawar.
- Director of Education FATA, K.P.K, Peshawar.
- Political Agent Mohmand Agency.
- Agency Accounts Officer Mohmand Agency at Ghallanai.
- AAEOs concerned.
- Accountant local office.
- Teachers concerned.

Agency Education Officer
Mohmand Agency at Ghallanai.

CO 12

SS:1

MC6013 North April 2023
MC6013 East Primary Schools I
DEO PRIMARY EDUCATION M

Pers #: 00356011 Buckle
Name: MUSTAFA KHAN
PRIMARY SCHOOL TEACHER
CNIC No 2140716616191
GPF Interest Applied

MTD
GPF #
OIR #

12 Active Temporary

MC6013 -6.

PAYS AND ALLOWANCES

0001-Basic Pay	32,640.00
1001-House Rent Allowance 45%	2,940.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,500.00
2148-15% Adhoc Relief All-2013	329.00
2199-Adhoc Relief Allow 10%	225.00
2316-Teaching Allowance 2021	2,664.00
2341-Dispr Red All 15% 2022KP	3,150.00
Gross Pay and Allowances	50,954.00

DEDUCTIONS:

IT Payable	21.68	Deducted	59.00	TAX (1809)	11.00
GPF Balance	171,624.00			Subrc	2,220.00
6505-GPF Loan Principal Instal	Bal:	99,022.00			4,306.00
3501-Benevolent Fund					1,200.00
3990-Emp Edu Fund KPK					135.00
4004-R. Benefits & Death Comp:					200.00

Total Deductions 6,432.00

42,482.00

D O B

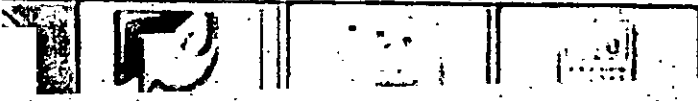
LFP Quota:

01.07.1982

UNITED BANK LIMITED YAKACHUND

20 Years 01 Months 026 Days

0204940573



BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

Writ Petition No. 4340P 12020

1. Mustafa Khan, PTC,
Government Primary School Anno Khel Ghallani District Mohmand.
2. Ghazala, PTC,
Government Primary School Bahi Dag, Ghallanai, District Mohmand.

3. Sabiha, PST,
Government Girls Primary School Soor Braj Ghallanai, District
Mohmand

4. Farzana Yousaf, PTC,
Government Girls Primary School Kung Farmanullah Ghallanai,
District Mohmand.

5. Nigat Bano, PST,
Government Girls Primary School Baghi Shah Ghallanai,
District Mohmand

6. Shaista, PST,
Government Girls Primary School Joura Rawesh Ghallanai,
District Mohmand

7. Janat Gul Khan, PST,
Government Primary School Ghair Dand Ghallanai,
District Mohmand

8. Sartaj, PTC,
Government Primary School Qamardin, Ghallanai,
District Mohmand

9. Adil Shah, PTC,
Government Primary School Said Rahman Gurbaz, Ghallanai,
District Mohmand

10. Muhammad Irshad, PTC,
MPS Abdul Jabbar, Ghallanai, District Mohmand.

11. Nasir Khan, PTC,
Government Primary School Shamshah Guno Ghallanai,

FILED TODAY
Deputy Registrar
25 SEP 2020

District Mohmand

13. Sajid Ali, PTC
Government Primary School Bacha Kandao Ghallanai,
District Mohmand
13. M. Naseer, PST,
Government Primary School Toor Khel, Ghallanai,
District Mohmand
14. Irfan Ullah, PTC,
Government Primary School Toor Khel Ghallanai,
District Mohmand.
15. Amir Khan, PTC,
Government Primary School Gumbati Ambar Ghallani,
District Mohmand.
16. Shahid Nasim, PTC,
Government Primary School Yaqoob Khanzadagan Ghallanai,
District Mohmand
17. Ameen Khan, PTC,
Government Primary School Selai Dawad Jan Ghallanai,
District Mohmand.
18. Gul Nabi, PTC,
Government Primary School Zanawar Cheena Gul Said GHallanai,
District Mohmand.
19. Zahir, PTC,
Government Primary School Zanawar Cheena Gul Said GHallanai,
District Mohmand.
20. Issa Dad, PTC,
Government Primary School Spinki Tangi Ghallanai,
District Mohmand.

FILED TODAY
Deputy Registrar
25 SEP 2020

Mud. S.
PETITIONERS

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat, Peshawar.
2. The Secretary Education Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Secretary Finance Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. The Additional Chief Secretary (FATA),
5. The Director Education (FATA), FATA Secretariat, Warsak FATA Secretariat, Warsak Road, Peshawar Road, Peshawar.
6. The District Education Officer District Mohmand at Ghallanai.

FILED TODAY
Deputy Registrar
25 SEP 2020

RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN
AS AMENDED UPTO DATE.

RESPECTFULLY SHEWETH:

1. That the petitioners were initially appointed as PST Teacher in the Project Community School Teachers in the year 2000, 2001, 2003, 2004, 2006, & 2007. Since the appointment the petitioners are performing their duties upto the entire satisfaction of their superior Officers. Copy of orders are attached as Annexure-A.
2. That due to some complaint by the local people of the area in some of the agencies the communities' schools were closed in the year 2010 but reopened by the Fata Secretariat soon. Copies of orders of closer and reopening of the school are attached as Annexure-B.
3. That in meantime the worthy Governor Khyber Pakhtunkhwa, in the capacity of the competent authority, notified on 11.05.2012 a policy/guidelines for accommodating the community school teacher against the available regular post. It is also worth to mention here that after the opening Communities schools the petitioners were readjusted / reappointed against their original post

in the year 2011. Copies of notification and readjustment order are attached as Annexure-C & D.

4. That the petitioners have been regularized in the year 2013 and onwards vide notification dated 30.08.2013 to the petitioners have been regularized w.e.from 01.09.2013. Since the regular appointment the petitioners are continuously performing their duties upto the entire satisfaction of their superiors officers. Copy of regularization order are attached as Annexure-E.
5. That since the petitioners have more than 10 Years temporary services at their credit which was not counted towards their pay and pension protection which cost huge financial loss to the petitioners.
6. That having no other remedy the petitioners are constrained to file the instant main writ petition on the following grounds amongst the others.

GROUND:

- A) That the inaction of the respondents and not counting their previous service of more than 10 years toward pay and pension protection is against the principle of justice fair play equity and equality.

FILED TODAY
Deputy Registrar B)
25 SEP 2020

- B) That in summary to the worthy Governor it was admitted by the respondents department that the petitioners have rendered more than 10 years service on contract basis and also Senate Standing Committee recommended the regularization of the petitioners therefore they should be regularized. On the basis of that summary the worthy Governor KPK has issued notification dated 11.05.2012 (Annexure-C), therefore the petitioners are legally entitled to he benefits of previous service towards pay and pension fixation. Copy of Summary is attached as Annexure-F

- C) That as per pension rules the temporary and officiating followed by confirmation/regularizations will be counted towards pension and pay protection. Copy of the relevant rules is attached as Annexure-G.

- D) That this august Court has already decided writ petition No. 1188-P/2014 and 361-P/2013 wherein the previous service has been ordered to be counted towards pay and pension protection. Copy of Judgment is attached as Annexure-H & I

(17)

E) That even in and other writ petition No. 3221-P/2013 this august Court as directed the respondents to count the previous service towards pay and pension fixation by allowing the writ petition. Copy of Judgment is attached as Annexure-J.

F) That the august Court has also decided a similar writ petition bearing No. 5585-P/2018 on 04.09.2019. thus the petitioners are also entitled for the same relief. Copy of the Judgment is attached as Annexure-K.

G) That the petitioners are not treated in accordance with law and rules keeping in view the above referred judgments the petitioners also deserve same treatment under the principle of equity and equality and consistency.

H) That the inaction and not counting the previous service of the petitioners toward pay and pension fixation protection, is against the principle of Article-2A, 9, 25 and 38 of the Constitution.

I) That the petitioner seeks permission to advance other grounds and proofs at the time hearing.

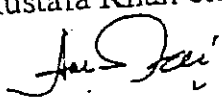
It is, therefore, most humbly prayed that on acceptance of this writ petition the inaction on the part of respondent and not counting the previous service of the petitioner towards pay protection and pensionary benefit may be declared as illegal unconstitutional arbitrary and exploitation of the past good service of the petitioners. The respondent may further please be directed to allow full pay protection and pensionary benefit of the past service to the petitioners to meet the ends of justice, principles of equity and by treating them at par with the petitioner of the above referred writ petition. Any other remedy which this august court deems appropriate may also be awarded in favour of petitioners.

FILED TODAY
Deputy Registrar
25 SEP 2020


PETITIONER

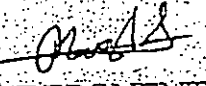
Mustafa Khan etc.

THROUGH:


(M. ASIF YOUSAFZAD)
ADVOCATE SUPREME COURT,
OF PAKISTAN.

VERIFICATION:

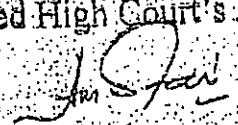
It is verified that no other Writ Petition earlier has been filed between the present parties, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. Any other case law as per need.

NOTE: Prior Notice along with the copies of the Writ Petition has already been given to the respondents as per amended High Court's Rules dated: 23.02.2016.


(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
OF PAKISTAN.

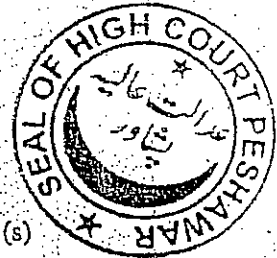
-FILED TODAY
Deputy Registrar
25 SEP 2020

IN THE PESHAWAR HIGH COURT,
PESHAWAR,
[Judicial Department].

Writ Petition No.2802-P/2020

Murad Ali, PTC,
GPS Taraki Tangi Ghallanai,
District Mohmand and others.

Petitioner (s)



VERSUS

The Government of Khyber Pakhtunkhwa,
through Chief Secretary and others.

Respondent (s)

For Petitioner (s) :-

Mr. Muhammad Asif Yousafzai, Advocate.

For Respondents :-

Mr. Rab Nawaz Khan, AAG.

Date of hearing:

01.10.2020.

JUDGMENT

ROOH-UL-AMIN KHAN, J.:- Through this common judgment, we propose to decide the instant writ petition and connected Writ Petition No.2803-P/2020, titled, "Muhammad Ishaq etc vs Government of Khyber Pakhtunkhwa through Chief Secretary and others" as identical question of law and fact is involved therein.

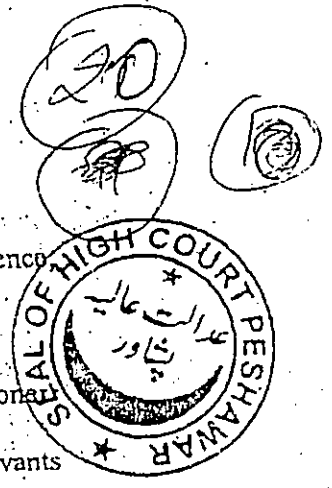
2. As per averments in the writ petitions, the petitioners were initially appointed as PSTs in the Project Community School Teachers in the year 2000 to 2007. The said schools were closed in the year 2010. In the meanwhile, the Governor Khyber Pakhtunkhwa vide notification dated 11.05.2012, accommodated the petitioners by re-adjusting/appointing them against the substantive posts. The services of the petitioners were regularized w.e.f. 01.09.2013. Grievance of the petitioners is that the respondents have refused to count temporary service

ATTESTED

EXAMINER

Peshawar High Court

Peshawar High Court



towards their regular service for the purpose of pension, hence these writ petitions.

3. At the very outset learned counsel for the petitioners fairly and frankly conceded that petitioners are civil servants and jurisdiction of this Court in the matter is barred under Article 212 of the Constitution, however, requested that it would be in the interest of justice if the petitions of the petitioners are treated as departmental appeals and sent to the respondents for decision in light of the guidelines laid down by a Larger Bench of this court in its judgment dated 22.06.2017, rendered in Writ Petition No.3394-P/2016, titled, "Amir Zeb etc vs the District Account Officer Nowshera and others".

4. In view of the above, we instead of dismissing the writ petition treat them as departmental appeals on behalf of the petitioners and transmit the same to the respondents for consideration and decision strictly in accordance with the Civil Servants Pension Rules 1963 as well as the guidelines laid down by the Larger Bench of this court in its judgment dated 22.06.2017, rendered in Writ Petition No.3394-P/2016, titled, "Amir Zeb etc vs the District Account Officer Nowshera and others".

Announced:
01.10.2020

13 OCT 2020

[Signature]
CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 217 of
the Constitution of Pakistan 1973
13 OCT 2020

[Signature]
JUDGE

[Signature]
JUDGE

DD of Hon'ble Mr. Justice Raah ul Amin Khan and
Hon'ble Mr. Justice Ikram Ullah Khan.

13 OCT 2020

To

The District Education Officer,
District, Mohmand.

Through proper channel

**SUBJECT: REMINDER/APPLICATION FOR DECIDING THE
DEPARTMENTAL APPEAL OF THE APPELLANT WHICH
WAS TRANSMIT BY THE PESHAWAR HIGH COURT
PESHAWAR VIDE ORDER DATED 04/09/2019.**

Respected Sir,

Most humbly it is submitted that I am civil servant and presently working as PST.

That the same benefit was not awarded to the appellant and the pay of the appellant was fixed as fresh pay without considering the previous pay and service of the appellant which is against the law and rules.

The appellant filed writ petition no 4340-p/2020 for his claim. The said Writ Petition was heard on 2020 and the Hon'ble Court was kind enough to convert the Writ Petition as departmental appeal and transmit it to your good self for treating the Writ Petition as departmental appeal and to decide the same in accordance with law. **Copy attached.**

The deptt: so many times makes promise to decide the departmental appeal of the appellant but no fruitful result achieved now after passing two years the departmental appeal of the appellant is still pending. Which is also violation of Peshawar High Court Peshawar Judgment.

22 28
18 47

That according to government policy, the appellant had right to benefit of the pay protection will be admissible to the employees under WEST Pakistan 1963 pension rules and judgment of Larger bench of Peshawar High Court Peshawar.

It is therefore, most humbly requested, on acceptance of this application/reminder, the departmental appeal of the appellant shall be decided and the pay of appellant may kindly be protected and the service rendered on contract basis may be accounted toward the length of service and pensionary benefits in order to the save the appellant from financial loss.

Mustafa Go Wasim Khan
Mustafa
Applicant

21407-3661634-1

Date: 01/12/2022

CC to: The Secretary to Govt: (E&SE) Deptt: KP Peshawar.

CC to: The Director (E&SE) Merged Area, KP, Peshawar.

Noor Badrinar

From

1/12/22

Better Copy

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block A Opposite MPA.s Hostel, Civil Secretariat Peshawar
Phono No. 091-9223587.

ORDER

No. SO (Lit-IV) E&SED/COC#69-P/2023/WP 4340-P/2020/Mustafa Khan & others

WHEREAS Mustafa Khan and 19 others appellant (Petitioners) were initially appointed as PST Teacher in the Project Community School Teachers for a project period at various community schools at District Mohmand in the year 2000 to 2007.

2. AND WHEREAS, the Community School Teachers project was closed down on 31.12.2010.
3. AND WHEREAS, the Community School Teachers was re-appointed consequent upon the direction of competent authority vide order No. 6048-61 dated 09.12.2011.
4. AND WHEREAS, in pursuance of the notification No. SO (E)/SSD/SCTR/99-10, dated 11-05-2012 duly approved by the then Government Khyber Pakhtunkhwa the services of the appellant were regularized w.e.f 01/0/2013.
5. AND WHEREAS, Mustafa Khan and 19 others filed Writ Petition No. 4330-P/2020 before the Hon' able Peshawar High Court with the prayer of couting their previous services towards pay protection and back benefits.
6. AND WHEREAS, the Hon' able Peshawar High Court Peshawar vide its Judgment dated 12-12-2020 treated the Writ Petition as Departmental Appeal and transmitted the same to the respondent Department for consideration and decision in light of the Judgment in Writ Petition No. 2802-P/2020 as well as decision strictly in accordance with Civil Servant Pension Rules, 1963 and the guidelines laid down by the larger bench in Writ Petition No. 3394-P/2016 title Amir Zeb etc Vs Account officers, Nowshera & other.
7. AND WHEREAS, the respondent Department in the light of Judgment of Peshawar High Court in Writ Petition No. 4340-P/2020 conducted a Departmental Consideration Committee meeting on 21/03/2023.
8. AND WHEREAS, the respondent Department in the light of Judgment of Peshawar High Court conducted a Departmental appellate committee meeting, and provided opportunity of hearing to the Petitioners.
9. NOW THEREFORE, in pursuance of order Dated 10-12-2020 the Hon' able Peshawar High Court Peshawar, with relevant law, rules, policy and recommendations of the Appellate Committee meeting, discussed hereinabove, the undersigned, in the capacity of Appellate Authority is of the considered view that the Petitioners namely Mustafa Khan and 19 others are not entitled to back benefits and pay protection for the period served in Community School Project, hence, the claim of the Petitioners hereby stands rejected in the interest of public service.

SECRETARY
E&SE DEPARTMENT

Endst of even No. & date

Copy of the above is forwarded to the:-

1. Additional Registrar (Judicial); Peshawar High Court, Peshawar.
2. Additional Advocate General Peshawar High Court, Peshawar.
3. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male), Mohmand.
5. Section Officer (Lit:III), Elementary & Secondary Education Department.
6. Teachers concerned.

97

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 991-4224387

Dated Peshawar the April 6th, 2021

ORDER

No. SO(E)SSD/EDUC/69-P/2023/WP/4340-P/2020/Mustafa Khan & others

1. WHEREAS, Mustafa Khan and 19 other appellants (petitioners) were initially appointed as P.T.I teachers in the Project Community School Teachers for a project period at various community schools in District Mardan in the year 2009 to 2010.

2. AND WHEREAS, the Community School Teachers project was closed down on 31-12-2010.

3. AND WHEREAS, the Community School Teachers were re-appointed consequent upon the decision of Competent Authority, vide order No. 6248-61, dated 07-12-2011.

4. AND WHEREAS, in pursuance of the notification No. SO(E)SSD/SCTR/99-10, dated 07-12-2011 duly approved by the then Governor Khyber Pakhtunkhwa the services of the appellants were regularized with effect from 07-12-2011.

5. AND WHEREAS, Mustafa Khan and 19 other appellants filed Writ Petition No. 4340-P/2020 before the Honorable Peshawar High Court with the prayer of granting their previous services towards pay protection and back benefits.

6. AND WHEREAS, the Respondent Peshawar High Court Peshawar vide its judgment dated 01-03-2021 dismissed the writ petition and departmental appeal and transmitted the same to the respondent department for its consideration and action in light of the judgment in writ petition No. 2807-P/2020 as well as decision strictly in accordance with P.T. School Pension Rules, 1963 and the guidelines laid down by the Honorable Writ Bench No. 13 of 2015 entitled Amir Zeb etc. Vs. Account Officer, Nowshera & others.

7. AND WHEREAS, the respondent department in the light of judgment of Peshawar High Court in Writ Petition No. 4340-P/2020 constituted a Departmental Appellate Consideration Committee meeting on 21-03-2021.

8. AND WHEREAS, the respondent department in the light of judgment dated 01-03-2021 conducted a Departmental Appellate Committee meeting and provided opportunity of hearing to the petitioners.

9. NOW, THEREFORE, in pursuance of order dated 10-12-2020 the Honorable Peshawar High Court Peshawar consulting with relevant law, rules, policy and recommendations of the Appellate Committee meeting discussed hereinabove, the undersigned, in the capacity of Appellate Authority, is of the considered view that the petitioners namely Mustafa Khan and 19 others are not entitled to back benefits and pay protection for the period served in Community Schools Project, hence, the claim of the petitioners hereto stands rejected in the interest of public service.

SECRETARY
E&S DEPARTMENT

Ends: of even No. & date:

Copy of the above is forwarded to the

1. Additional Registrar (Judicial) Peshawar High Court Peshawar

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GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

NO. FD (SOSR-1) 12-7/2014

Dated Peshawar the 6th February, 2014

1. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
2. Senior Member Board of Revenue Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa.
4. The Principal Secretary Chief Khyber Pakhtunkhwa.
5. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary Finance FATA, FATA Secretariat, Peshawar.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Divisional Commissioner's in Khyber Pakhtunkhwa.
9. All Political Agents/District & Session Judges in Khyber Pakhtunkhwa.
10. The Registrar Peshawar High Court Peshawar.
11. The Chairman Public Service Commission Khyber Pakhtunkhwa.
12. The Chairman Service Tribunal, Khyber Pakhtunkhwa.
13. The Accountant General, Khyber Pakhtunkhwa.

Subject:- PROTECTION OF PAY OF CONTRACT EMPLOYEES ON
REGULARIZATION/APPOINTMENT ON REGULAR BASIS.

Dear Sir:-

In pursuance to the finance Division's Office Memorandum No. R.1/2012 dated 31st May 2013, the competent authority is pleased to allow the pay protection to non gazetted contract employees on their regularization/appointment on regular basis with immediate effect subject to the following conditions:-

- i) That the contract appointment has been made on standard terms and conditions circulated by this Provincial Government are amended from time to time.
- ii) That the contract employ has applied through proper channel and has been properly by the appointed authority. This condition shall not apply in case of regularization on the same post.
- iii) That regularization/regular appointment has been made with the approval of competent authority.
- iv) That there is no break/interruption between contract service and regular service.
- v) That the service rendered on contract basis shall not qualify for pension/gratuity.
- vi) That in case of regular appointment in lower pay shall not be protected./

Your Faithfully
RAZAULLAH KHAN
Addl Secretary (Regulation)



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD (SOSR-1) 12-7/2014
Dated Peshawar the 6th February, 2014

(Handwritten marks and signatures)

To:

1. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa
2. The Senior Member Board of Revenue Khyber Pakhtunkhwa.
3. The Secretary General, Khyber Pakhtunkhwa
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa
6. The Secretary Finance FATA, FATA Secretariat, Peshawar
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Divisional Commissioners in Khyber Pakhtunkhwa.
9. All Political Agents / District & Sessions Judges in Khyber Pakhtunkhwa
10. The Registrar, Peshawar High Court, Peshawar.
11. The Chairman, Public Service Commission, Khyber Pakhtunkhwa
12. The Chairman, Services Tribunal, Khyber Pakhtunkhwa.
13. The Accountant General, Khyber Pakhtunkhwa, Peshawar.

Subject:

PROTECTION OF PAY OF CONTRACT EMPLOYEES ON
REGULARIZATION / APPOINTMENT ON REGULAR BASIS:

Dear Sir,

In pursuance to the Finance Division's Office Memorandum No. WDR-1/2012 dated 31st May 2013, the competent authority is pleased to allow the pay protection to non-Gazetted contract employees on their regularization / appointment on regular basis with immediate effect subject to the following conditions:-

- i) That the contract appointment has been made on standard terms and conditions, circulated by this Provincial Government as amended from time to time.
- ii) That the contract employee has applied through proper channel and has been properly referred by the appointing authority. This condition shall not apply in case of regularization on the same post.
- iii) That regularization / regular appointment has been made with the approval of competent authority.
- iv) That there is no break / interruption between contract service and regular service.
- v) That the service rendered on contract basis shall not qualify for pension / gratuity.
- vi) That in case of regular appointment in lower grade, pay shall not be protected.

Yours faithfully,

(Signature)
(RAZAULLAH KHAN)
Addl. Secretary (Regulation)

P.T.O

95
226

Better Copy

Endst o FD, (SOSR-1)

12-7/2014

Dated 6h Feb, 2014

Copy for information and necessary action to the:-

1. The Director, Treasures & Accounts, Khyber Pakhtunkhwa.
2. All the District comptroller of Accountrs in Khyber Pakhtunkhwa.
3. The Director Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
4. The Director, PMIU, Finance Department.
5. The Treasury Officer, Peshawar.
6. The Secretary, Board of Revenue, Khyber Pakhtunkhwa.
7. All the District & Agency Accounts Officers, in Khyber Pakhtunkhwa/FATA.

(MASOOD KHAN)
Deputy Secretary (Reg-II)

Endst No. & date Even

Copy for information is forwarded to the:-

1. All the Section-Officers/Budged Officers in Finance Department, Khyber Pakhtunkhwa, Peshawar.
2. The Private Secretary to Senior Minister for Financed, Khyber Pakhtunkhwa.
3. The Private Secretary to Secretary/P.As to Special Secretary/Additional Secretaries/Deputy Secretariat in Finance Deptt:-

(Wazir Muhammad Afgar)
Section Officer (SR-1)

Dated 6th Feb, 2014

25

Endst: No. FD (SOSR-1) 12-7/2014

Copy for information & necessary action to the:-

1. The Director, Treasuries & Accounts, Khyber Pakhtunkhwa.
2. All the District Comptroller of Accounts in Khyber Pakhtunkhwa.
3. The Director, Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
4. The Director, FMIU, Finance Department.
5. The Treasury Officer, Peshawar.
6. The Secretary, Board of Revenue, Khyber Pakhtunkhwa.
7. All the District & Agency Accounts Officers in Khyber Pakhtunkhwa / FATA

(MASOOD KHAN)
Deputy Secretary (Reg-III)

Endst: No. & Date Even

Copy for information is forwarded to:-

1. All the Section Officers / Budget Officers in Finance Department, Khyber Pakhtunkhwa, Peshawar.
2. The Private Secretary to Senior Minister for Finance, Khyber Pakhtunkhwa.
3. The Private Secretary to Secretary / P.As to Special Secretary / Additional Secretaries / Deputy Secretaries in Finance Deptt.

(Wazir Muhammad Afgar)
Section Officer (SR-1)

VAKALAT NAMA

NO. _____/2023

IN THE COURT OF

KL Service Tribunal, Peshawar

Mustafa Khan

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Deptt

(Respondent)
(Defendant)

I/We, Mustafa Khan

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court of Pakistan & Syed Noman Ali Bukhari, Advocate High Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

Dated _____/2023

M. Asif Yousafzai
(CLIENT)

ACCEPTED

(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
OF PAKISTAN.

S. Noman Ali Bukhari &
(S. NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT,

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell No. 0302-5548451
0333-9103240
0306-5109438