

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

CM No \_\_\_\_/2023

In

Service Appeal No-7780/ 2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 5615

Dated 26/5/2023

Khurshid Khan .....Applicant/Appellant

**VERSUS**

Govt. of KP through its Chief Secretary & others

.....Respondents

**APPLICATION FOR PLACING ON FILE SOME  
NECESSARY DOCUMENTS ON BEHALF OF APPELLANT.**

**Respectfully Sheweth:**

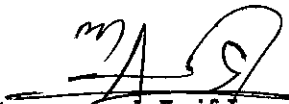
1. That the above titled appeal is pending adjudication before this hon'ble Tribunal and is fixed for today.
2. That inadvertently, the attached documents being necessary in nature were not in the possession of the appellant at the time of filing of the titled appeal.
3. That the attached documents with the application may kindly be considered as part and parcel of the main appeal.
4. That there is no legal bar to file the instant application.

(2)

It is, therefore, prayed that the application may graciously be allowed in the best interest of justice.

Applicant/Appellant

Through

  
Muhammad Arif Jan  
Advocate High Court

**AFFIDAVIT**

I, Khurshid Khan, Associate Professor at Govt. Post Graduate College, Charsadda do hereby affirm and declare on oath that the contents of application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
DEPONENT



Prof Raza Shah S...

September 15, 6:04 AM



# HOD Group

G.P.C. Charsadda

Sanction Post

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1	Account & Management					
2	Arabic	1	1			
3	Archaeology	1		1		
4	Art & Design					
5	Biology	2	1	1		
6	Botany	5	1	2	1	1
7	Business Administration					
8	Chemistry	8	1	4	1	2
9	Civics					
10	Commerce					
11	Computer Science (Information Technology)	7	3	2		2
12	Economics	5		2	2	1
13	Education					
14	Electronics	5	1	1	1	2
15	English	15	3	8	1	3
16	Environmental Sciences					
17	Food & Nutrition					
18	Gender Studies	1				1
19	Geography	2	1	1		
20	History	2			1	1
21	History cum Civics	1				1
22	Home Economics					
23	HPE	2	1	1		
24	Human Development					
25	Islamiat (Islamic Studies)	7	2	3	1	1
26	Law	1				1
27	Library Science	1	1			
28	Mathematics	8	3	3	2	
29	Pakistan Study	6	2	2		2
30	Pashto	5	2		1	2
31	Persian					
32	Philosophy	1				1
33	Physics	8	7	1		
34	physiology					
35	Political Science	5	1	3	1	
36	Principal	1				1
37	Psychology	1				1
38	Resource & Facility Management					
39	Sociology	1				1
40	Statistics	6	4	2		
41	Textile & Clothing					
42	Urdu	9	3	2	1	3

Post is vacant

No teacher after transfer

*[Handwritten signature]*

CHANDER PATEL

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## OFFICE OF THE PRINCIPAL

Government Postgraduate College, Charsadda  
Higher Education Department, Khyber Pakhtunkhwa, Pakistan

E-Mail: gpgc\_charsadda@yahoo.com

Ph. No: 091-6512541 Fax No: 091-6510262

No: 2159/GPGC Charsadda Dated: 27 /10/2018 /



## LETTER

### To whom it may concern

This is to certify that Mr. Khurshid Khan is a Permanent Government Employee of Higher Education Department, Government of Khyber Pakhtunkhwa, Pakistan. He joined this department as a lecturer in History on 28<sup>th</sup> March, 1998. The KP Government promoted him to the post of Assistant Professor on 18-5-2011. He was promoted to the post of Associate Professor on 31<sup>st</sup> May, 2018. He was transferred to this institute on 15-10-2018 from Government Degree College Hayatabad, Peshawar. **His punctuality and dedication in the performance of his duties can be judged from the fact that during his entire service, he has not availed even a single day Earned/Ex-Pakistan leave.**

He is a researcher, social reformer, and a staunch advocate of human rights, especially of the women. He submitted a research paper entitled, "Gender Mainstreaming in Global Governance: The Case of Pakistan" to the Researchfora, Oxford, which was accepted. He has been invited to present the same in the conference which will be held on 19<sup>th</sup>-20<sup>th</sup> November, 2018. In his paper he has argued that all people should enjoy equal rights irrespective of gender, colour, caste, and creed. In Pakistan, he says, all genders enjoy equal rights. Here, women can be seen serving in various fields. They are teachers, legislators, doctors, nurses, engineers, advocates, judges, magistrates, etc.

Going on the sabbatical, he will be granted Ex-Pakistan leave. He is strongly recommended to participate in the conference. He will return with new ideas which will be greatly beneficial to our education department.

I wish him luck for his future endeavours.

  
Principal

Professor Muhammad Raza Shah  
(Cell No. +92 3158993377)

  
ATTESTED



**OFFICE OF THE PRINCIPAL**  
Government Postgraduate College, Charsadda  
Higher Education Department Khyber, Pakhtunkhwa, Pakistan  
E-Mail: gpgc\_charsadda@yahoo.com  
Ph. No: 091-6512541 Fax No: 091-6510262  
Dated: 27/10/2018



**SERVICE CERTIFICATE**

**To whom it may concern**

This is to certify that Mr. Khurshid Khan is a Permanent Government Employee of Higher Education Department, Government of Khyber Pakhtunkhwa, Pakistan. He joined this Department as a *Lecturer* in History on 28<sup>th</sup> March, 1998 under Notification No.SO(C)II-1/96-VI dated 26-3-1998 Serial No.11. The KP Government promoted him to the post of *Assistant Professor* on 18<sup>th</sup> May, 2011 under Notification No.SO (COLLEGES)II-28/2011 Dated 18-5-2011 Serial No.100. He was promoted to the post of *Associate Professor* on 31<sup>st</sup> May, 2018 under Notification No.SO(C-II)/HED/2-5/Promotion/2018 Serial N0.58. He was transferred to this institute from Government Degree College (for Boys) Hayatabad, Peshawar on 15<sup>th</sup> October, 2018.

Mr. Khurshid Khan is a creative and resourceful teacher with an effective, positive, and flexible teaching style. His punctuality and dedication bestow upon him the privilege of being loved and respected by his students. His aim of enhancing the potentialities of students coupled with encouragement of higher order thinking and creativity differentiates him from others. In his entire service, he has not availed even a single day Earned/Ex-Pakistan leave. He has a keen interest in research work based on the philosophy of history. As a visionary social reformer, his motto is to bring, "Change Through Education" with special focus and emphasis on women education.

*M. Raza Shah*

**Principal**

**Professor Muhammad Raza Shah**  
(Cell No. +92 3158993377)

**ATTESTED**



OFFICE OF THE PRINCIPAL

# Govt. Postgraduate College Charsadda

E-Mail: gpgc\_charsadda@yahoo.com Ph No: 091-6512541



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Dated: 2<sup>nd</sup> March, 2022

To

Mr. Khurshid Khan  
Associate Professor of History  
GPGC Charsadda

Subject:

Teaching Duty

Respected Faculty Member

A few days ago, you were advised orally to take classes till the disposal of your appeal against your transfer from this college, however, you insisted to be instructed in writing. Hence, you are hereby directed to take classes of History to the student as per the following schedule with immediate effect:

Class	Room No	Time
FA Part-1	46	1100hrs to 1200 hrs
FA Part-2	Side room of Hall	0900 hrs to 1000 hrs

You are further directed to avoid sitting in the office of the Accountant and to use the adjacent side room of the Principal office during your stay at the college.

*M. Khan*

Principal  
GPGC Charsadda

*J*  
ATTESTED



# DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA  
KHYBER ROAD, PESHAWAR

Tel # 091-9210242 / 9211025 Fax # 091-9210215

E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshwar Twitter.com/dhekpkeshwar1

No. \_\_\_\_\_ / CA-I/ Estt: Branch/A-12/Khurshid Khan/History

Dated Peshawar the \_\_\_\_\_ / \_\_\_\_\_ / 2023

To

The Secretary  
Govt; of Khyber Pakhtunkhwa,  
Higher Education Department Peshawar.

SUBJECT LEAVE ENCASHMENT/ PRE-MATURE RETIREMENT.

Respected Sir, السلام عليكم

I am directed to enclose herewith a self-explanatory application alongwith original leave application on prescribed form for the grant of leave encashment for 228 days in lieu of LPR and other enclosures in respect Mr. Khurshid Khan, Associate Professor of History (B-19), Govt; Post Graduate College, Charsadda for appropriate action with the remarks that the officer concerned joined this Department as Lecturer in History on 28.03.1998. He was promoted to the post of Associate Professor (B-19) on 15.10.2018. His date of birth as per matric Certificate is 01.02.1964. He has requested for pre-mature retirement from service w.e.f 05.07.2023 (A.N).

2. It is requested that the officer concerned may be allowed to proceed on pre-mature retirement w.e.f 05.07.2023 (A.N) and to avail leave encashment for 228 days leave in lieu of LPR in light of leave admissibility report recorded by the District Accounts Officer concerned on the body of leave application form.

Certified that neither he is involved in any departmental/ Anti-Corruption case nor any inquiry is pending against him.

Yours Faithfully,

(Gohar Khan)

DY: DIRECTOR (ESTABLISHMENT)

Endst: No. 1748

Copy of the above is forwarded to the Principal, Govt; Post Graduate College, Charsadda with reference to his letter No. 1620 dated 27.03.2023.

DY: DIRECTOR (ESTABLISHMENT)

ATTESTED



OFFICE OF THE PRINCIPAL

Govt. Postgraduate College Charsadda

govtcollegecharsadda@gmail.com Ph No: 091-6512541



No: 1620/GPGC Charsadda  
To

Dated 27<sup>th</sup> March, 2023

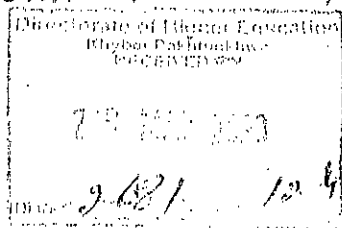
The Director  
Higher Education, Khyber Pakhtunkhwa  
Rano Ghari, New Chamkani, Peshawar.

**SUBJECT: RETIREMENT ON PREMATURE BASIS/LEAVE ENCASHMENT W.E.F. 05/07/2023 *AN*.**  
Respected Sir

Enclosed find herewith the following documents for premature retirement/leave encashment of 228 days, in respect of Mr. Khurshid Khan, Associate Professor of History (BPS-19), GPGC Charsadda w.e.f. 05/07/2023 is duly submitted with the following documents for further necessary action please.

1. Application of the officer concerned;
2. Copy of Computerized National Identity Card (attested);
3. Copy of Secondary School Certificate (attested);
4. Electricity Bill(attested Copy)& Clearance Certificate(attested copy) from the concerned SDO, WAPDA, Nowshera, KP;
5. Gas Bill (attested Copy)&Clearance Certificate(attested copy) from the concerned office SUI Northern Gas Pipelines, Peshawar;
6. Pay Roll for the month of February, 2023 (Computer generated sent via Email &attested);
7. Leave Admissibility Form from the accounts Office, Charsadda;
8. Non-Involvement Certificate from Government Post Graduate College Charsadda.

9. Also all the documents that are included in the proforma provided by the Directorate, HED, K.P.



*[Signature]*  
Principal  
Govt. Postgraduate College  
Charsadda  
28/03/2023

*[Signature]*  
**ATTESTED**