


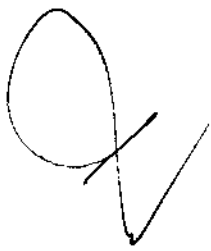
30<sup>th</sup> Jan, 2023

Junior of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Even on providing last opportunity for more than once and the fixation of the case for order, granted another opportunity to the appellant and his counsel to argue the appeal before the announcement of order, the appellant failed to argue the appeal and once again requested for adjournment. It is, therefore, adjourned on payment of cost of Rs. 10000/- . To come up for arguments on 09.02.2023 before D.B.

SCANNED  
K.P.S.T  
Peshawar

  
(Muhammad Akbar Khan)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman

09.02.2023

Counsel for the appellant present. Muhammad Adeel Butt learned Additional Advocate General for respondents present.


Mrs. Rozina Rehman, Learned Member (Judicial) is on leave today, therefore, case is adjourned to 07.04.2023 for arguments before D.B.

(Fareeha Paul)  
Member (E)

13<sup>th</sup> Oct., 2022

Counsel for the appellant present. M. Muhammad Riaz Khan  
Paindakhel, Assistant Advocate General for the respondents  
present.

Learned counsel for the appellant requests for adjournment in  
order to further prepare the brief. Last opportunity is granted. To  
come up for arguments on 23.11.2022 before the D.B.

  
(Fareeha Paul)  
Member (E)


  
(Kalim Arshad Khan)  
Chairman

23<sup>rd</sup> Nov. 2022

Junior to counsel for the appellant present. Mr. Kabirullah  
Khattak, Addl. AG for the respondents present.

Last opportunity was granted to appellant to argue the case  
but today adjourned is being sought. To come up for order on  
30.01.2023 before the D.B. Learned counsel for the appellant  
may argue the case before announcement.

**SCANNED**  
**KPST**  
**Peshawar**


  
(Fareeha Paul)  
Member (E)


  
(Kalim Arshad Khan)  
Chairman

06.06.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 18.08.2022 before the D.B.

  
(Fareeha Paul)  
Member (E)


  
(Salah-ud-Din)  
Member (J)

18.8-22

*Due to Swamin's vacation the case is adjourned to 15-9-22 for the same.*




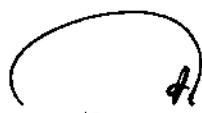
15.09.2022

 Nemo for parties.

Muhammad Adeel, learned Additional Advocate General present.

Preceding date was changed on Reader note, therefore, both parties be put on notice for arguments on 13.10.2022 before D.B.

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

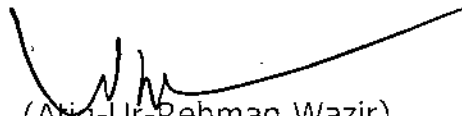
*Nefed  
H. S.  
5/11/22*


02.08.2021

Learned counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Javed Iqbal Stenographer for respondents present.

At the very outset, a notification bearing endorsement No.2715-20 dated 10.10.2019 was produced which shows that in compliance to the judgment of Hon'ble Pehsawar High Court, the present appellant alongwith others were conditionally appointed subject to final decision filed in the Hon'ble Supreme Court of Pakistan. When learned counsel was confronted with the notification he requested for adjournment in order to apprise the Tribunal in respect of the present situation. Case is adjourned to 09.12.2021 for arguments/ further proceedings in view of the notification produced today before this Tribunal.

  
(Aliq-Ur-Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

09.12.2021

Counsel for the appellant and Mr. Muhammad Asif Masood, DDA alongwith Muhammad Murtaza, Superintendent for the respondents present.

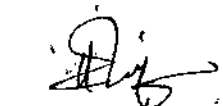
Learned AAG seeks time for preparation. Request is accorded. To come up for arguments on 30.03.2022 before the D.B.

  
(Salah-ud-Din)  
Member(J)

  
Chairman

30-3-2022

Proper DB not available the case is adjourned to come up for the same as before on 6-6-2022

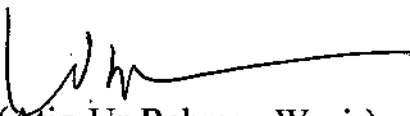
  
Reader

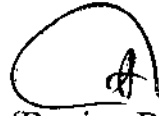
02.12.2020

Counsel for appellant present.

Riaz Paindakhel learned Assistant Advocate General for respondents present.

Former requests for adjournment as issue involved in the present case is pending before a Larger Bench of this Tribunal. Adjourned. To come up for arguments on 01.03.2021 before D.B

  
(Atiq-Ur-Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

01.03.2021


Due to COVID-19, the case is adjourned for the same on 01.06.2021 before D.B

  
READER

01.06.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Former sought adjournment on the ground that similar issue involved in the instant appeal is pending before a Larger Bench of this Tribunal, therefore, Adjourned. To come up for arguments before the D.B on 02.08.2021.

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN).  
MEMBER (JUDICIAL)

03-4.2020

Due to COVID19, the case is adjourned to  
6/8/2020 for the same as before.

  
Reader

06.08.2020

Due to summer vacation case to come up for the same on  
08.10.2020 before D.B.

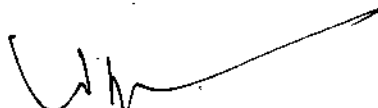
  
Reader

08.10.2020

Counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General  
for respondents present.

Learned AAG made a request for adjournment in order to  
produce record/inquiry report. Adjourned. To come up for  
record/arguments on 02.12.2020 before D.B.

  
(Atiq ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)

06.01.2020

Learned counsel for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Fawad Afzal, Senior Clerk for respondents present. Representative of the respondents seeks time for submission of enquiry record. Adjourn. To come up for enquiry record and arguments on 04.02.2020 before D.B.

  
Member

  
Member

04.02.2020

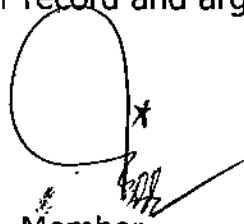
Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Muhammad Tariq, Assistant for the respondents present. Case to come up for inquiry record mentioned in order sheet dated 21.11.2019 and arguments on 09.03.2020 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

09.03.2020


Counsel for the appellant present. Addl: AG for respondents present. Enquiry record not submitted. Respondents are strictly directed to produce enquiry report mentioned in order sheet dated 21.11.2019 positively on the next date of hearing. Adjourned. To come up for record and arguments on 03.04.2020

  
Member

  
Member

17.10.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned Assistant AG requested for adjournment. Adjourned to 21.11.2019 for arguments before D.B.



(Ahmad Hassan)  
Member



(M. Amin Khan Kundi)  
Member

21.11.2019

Learned counsel for the appellant present. Mr. Riaz Paindakheil learned Assistant Advocate General for the respondents present. Learned Asst: AG requested that the inquiry report is not available on record, therefore, the same may be requisitioned. Respondents are directed to direct the representative to attend the court and furnished the relevant inquiry record on the basis of which the appellant was terminated vide order dated 11.12.2015 positively on the next date. Adjourned. To come up for record and arguments on 06.01.2020 before D.B.



(Hussain Shah)  
Member



(M. Amin Khan Kundi)  
Member



14.03.2019

Junior for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant seeks adjournment on the ground that learned senior counsel is not available today. Adjourn. To come up for arguments on 29.03.2019 before D.B.

*MA*

(M. AMIN KHAN KUNDI)  
MEMBER

*D-1*

(M. HAMID MUGHAL)  
MEMBER

29.03.2019

The bench is incomplete, therefore,  
the case is adjourned to. 14-5-19

*J*  
Reader

14-5-19

The bench is incomplete, therefore,  
the case is adjourned to. 16-10-19

*J*  
Reader

16-10-19

The bench is incomplete, therefore,  
the case is adjourned to. 17-10-19

*J*  
Reader

Appeal No. 487/2016


13.12.2018

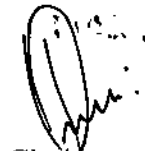
Counsel for the appellant and Mr. Muhammad Riaz Painsa Khel, Asstt. AG, for the respondents present.

Counsel for the appellant states that Service Appeal No. 302/2016 <sup>involving</sup> or similar matter has been fixed for arguments on 02.01.2019 before the D.B-II and requests for adjournment of instant appeal to the said date.

Adjourned to 02.01.2019 for hearing before the

D.B-II

  
Member

  
Chairman

02.01.2019

Learned counsel for the appellant and Mr. Riaz Painsa Khel learned Assistant Advocate General alongwith Sarwar Khan ADEO present. Representative of the respondents seeks time to furnish complete record. Granted. To come up for record and arguments on 30.01.2019 before D.B.


  
Member

  
Member

30.01.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney alongwith M/S Bahadur Computer Operator and Daud Jan Superintendent present. Adjournment requested. Adjourn. Adjourn. To come up for arguments on 14.03.2019 before D.B.

  
Member

  
Member

04.04.2018


None for the appellant present. Addl; AG for respondents present. Adjourned. To come up for arguments on 08.06.2018 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Hamid Mughal)  
Member

08.06.2018

None for the appellant present. Addl; AG for respondents present. Adjourned. To come up for arguments on 09.08.2018 before D.B

  
(Ahmad Hassan)  
Member

  
(Muhammad Hamid Mughal)  
Member

09.08.2018

Appellant with Mr. Noor Muhammad Advocate and Mr. Kabir Ullah learned Additional Advocate General alongwith Mr. Daud Jan AD legal present. Noor Muhammad Khattak Advocate submitted wakalat nama in favor of appellant which is placed on file and being freshly engaged, seeks adjournment. Granted. To come up for arguments on 25.10.2018 before D.B

  
(Muhammad Amin Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

25.10.2018

Due to retirement of Hon'ble Chairman, the tribunal is defunct. Therefore, the case is adjourned. To come up for same on 13.12.2018.

  
READER

13.12.2018

Counsel for the appellant and Mr. Muhammad Riaz,  
Painda Khel, Asstt. AG for the respondents present.

Counsel for the appellant states that Service Appeal  
No. 302/2016 of similar matter has been fixed for  
arguments on 02.01.2019 before the D.B-II and requests  
for adjournment of instant appeal to the said date.


Adjourned to 13.02.2019 for hearing before the D.B

Member

Chairman

20.07.2017


Counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for rejoinder and arguments on 22.11.2017 before D.B.

  
(Gul Zeb Khan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member


21.11.2017 Learned Counsel for the appellant present. Mr. Muhammad Jan, Deputy District attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 30.01.2018 before D.B.

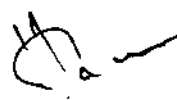
  
(Gul Zeb Khan)  
MEMBER

  
(MUHAMMAD HAMID MUGHAL)  
MEMBER

30.01.2018

Learned counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Daud Jan, Superintendent for the respondents present. Learned counsel for the appellant submitted rejoinder, which is placed on file. Learned counsel for the appellant also seeks adjournment for arguments. Adjourned. To come up for arguments on 04.04.2018 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member (J)

  
(Muhammad Hamid Mughal)  
Member (J)

25.4.2017

Counsel for the appellant and Addl. AG for the respondents present. Written reply already submitted by respondents No. 1, and 4. Written reply not submitted on behalf of respondents No. 2, 3 and 5 despite grant of last opportunity. Requested for further adjournment. Last opportunity further extended subject to payment of cost of Rs. 500/- which shall be borne by respondents from their own pockets. To come up for written reply/comments and cost of respondents No. 2, 3 and 5 on 25.05.2017 before S.B.

  
(Ahmad Hassan)  
Member

25.05.2017

Counsel for the appellant and Addl. AG for the respondents present. Addl. AG relies on behalf of respondents No. 2, 3 and 5 to the written reply already submitted by respondents 1 and 4. Costs of Rs. 500/- not paid it is to be decided by the D.B either to be paid or otherwise. To come up for rejoinder and final hearing on 20.07.2017 before D.B.

  
(AHMAD HASSAN)  
MEMBER

08.02.2017

Counsel for the appellant and Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. To come up for written reply comments on 06.03.2017

  
(ASHFAQUR TAJ)  
MEMBER


04.03.2017

Clerk to counsel for the appellant and Mr. Daud Jan Superintendent alongwith Addl. AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply comments on 04.03.2017 before S.B.

MUHAMMAD AMIR NAZIR  
MEMBER

07.03.2017

Counsel for the appellant Mr. Daud Jan Saad Superintendent No. 1 and Addl. AG for the respondents present. Written reply to respondents No. 1 & 2 not submitted. Counsel for Addl. AG requested for adjournment for behalf of respondents No. 2, 3 and 4. Request accepted. To come up for written reply comments on 08.03.2017 before S.B.

  
Daud Jan Saad  
MEMBER

29.09.2016

Counsel for the appellant and Mr. Mustaz Khan,  
Stenographer for respondents No. 1 to 4 alongwith Addl.

08.02.2017

AG for respondents present. Written reply not submitted  
Counsel for the appellant and Addl. AG for  
respondents present. Written reply not submitted  
Requested for adjournment. Request accepted. To come up  
Requested for adjournment on 08.02.2017 before S.B. for written  
reply/comments on 06.03.2017

  
Chairman

30.11.2016

Clerk to counsel for the appellants (Sd/ Addl. AG)  
(ASHFAQUE TAJ) MEMBER  
for respondents present. Written reply not submitted.  
Requested for adjournment. Request accepted. To come  
up for written reply on 17.01.2017 before S.B.

  
Member

17.01.2017

Appellant in person and Mr. Daud Jan, Superintendent  
alongwith Mr. Kabirullah Khattak, Assistant AG for respondents  
present. Written reply on behalf of respondent No. 1 & 4 submitted.  
None one appeared on behalf of respondents No. 2, 3 and 5 therefore,  
notice be issued to the said respondents. To come up for written  
reply/comments on behalf of respondents No. 2, 3 and 5 on  
08.02.2017 before S.B.

  
(ASHFAQUE TAJ)  
MEMBER



18.07.2016

None present on behalf of the appellant. Notice be issued to appellant and his counsel for preliminary hearing for 28.07.2016 before S.B.

  
MEMBER

28.07.2016

Counsel for the appellant present. Learned counsel for appellant argued that the appellant was serving as Physical Education Teacher when removed from service on the allegations of fake documents vide impugned order dated 11.12.2015 where-against departmental appeal was preferred on 24.12.2015 which was not responded and hence the instant service appeal on 25.4.2016.

That the appellant was appointed in the mode and manners prescribed by law on the strength of his valid documents. That neither the prescribed procedure of enquiry was followed nor any opportunity of hearing afforded to the appellant. That the appellant was terminated with an object to create a vacancy by the concerned Agency Education Officer for other appointment. That the appellant is entitled for reinstatement in service with all back benefits.

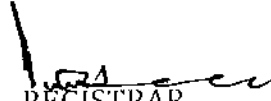

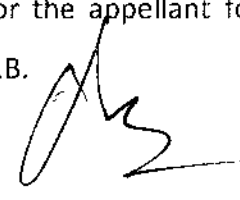

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 29.09.2016 before S.B.

Appellant Deposited  
Security & Process Fee

  
Chairman

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_  
Case No. 488/2016

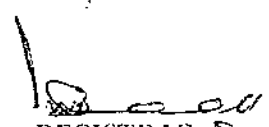
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/05/2016	<p>The appeal of Mr. Zia Alam resubmitted to-day by Mr. Muhammad Amin Khattak Lachi Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	11-5-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19.5.16</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	19.05.2016	<p>None present for appellant. Notice be issued to appellant/counsel for the appellant for preliminary hearing for 29.06.2016 before S.B.</p> <p style="text-align: right;"> Member</p>
	29.6.2016	<p>Appellant in person present. Requested for adjournment as counsel for the appellant is indisposed. Adjourned for preliminary hearing to 18.07.2016 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The joint appeal of M/S Zia Alam and Gul Hassan of Kurram Agency received to-day i.e. on 25.04.2016 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- Copy of order dated 07.12.2015 mentioned in the heading of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of order dated 11.12.2015 is illegible which may be replaced by legible/better one.
- 4- Sub-rule-2 of rule-3 of the appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately. therefore, the appeal of the above named appellant may be filed separately.

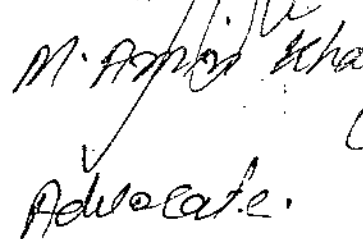
No. 656 /S.T.

Dt. 75/4 /2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M. Amin Khattak Lachi Adv. Pesh.

objection were removed and  
necessary completion are made  
and is submitted ~~and~~ before  
this honorable court.

  
M. Amin Khattak  
Lachi  
Advocate.

10-05-2016

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.

Service Appeal No. 488/2016

Zia Alam ..... Appellant

Versus

Additional Agency Education Officer & others..... Respondents

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5	Copy of appointment order	B	7
6	Copy of charge report.	C	8
7	Copy of termination order.	D	9-9-A
8	Copy of department appeal	E	10
9	Copy of verification.	F	11
10	Copy of attendance sheet.	G	12-42
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Appellant

Through

**Muhammad Amin Khattak (Lachi)**  
Advocate, Supreme Court

&

**Noor Wali Khan**  
Advocate, Peshawar.

Dated: 10.05.2016

①

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. 488 /2016

Zia Alam Son Of Noor Alam R/O Village Gogani,  
Post Office Sadda, Tehsil Central Kurram Agency,  
District Kurram Agency.....Appellant

**Versus**

1. Additional Agency education officer lower Kurram agency.
2. Agency Education Officer Lower Kurram Agency.
3. Assistant Education Officer Lower Kurram Agency.
4. Director of Education FATA KPK Peshawar.
5. Agency Account Officer Parachinar . . . . . Respondents

**APPEAL UNDER SECTION 4 OF THE NWFP SERVICE**  
**TRIBUNAL ACT 1974 READ WITH RELEVANT RULES**  
**AGAINST THE JUDGMENT AND ORDER OF**  
**RESPONDENT NO.1 DATED 11.12.2015, WHEREBY**  
**THE APPELLANT WAS TERMINATED FROM THE**  
**SERVICE (PET).**

**PRAYER:**

***On acceptance of this appeal the impugned order/  
judgment dated 11.12.2015 may be set aside and  
appellant may be allowed to serve as a PET teacher  
in their previous position.***

**Respectfully Shewith:**

1. That the appellant Gul Hassan was appointed as a PET Male teacher Government Middle School Jilamai Kurram agency as a PET Male teacher from the date 01.03.2013.
2. That the appellant took charge and posted on 16.01.2013 as a PET male teacher GMS Jilamai Kurram agency against the vacant post.
3. That appellant performed his duty honestly and no complaint was laid their against the appellant.
4. That on 11.12.2015 the respondent No.1 to 3 are terminated the appellant from the service and allegation against him of degree bogus and fake.
5. That feeling aggrieved from the said order the appellant filed departmental appeal on 24.12.2015 but that was not responded, finding no alternative this service appeal is filed on the following grounds;

**GROUND:**

- A. That the impugned order dated 11.12.2015, is against the law and facts and is liable to be set aside.
- B. That penal action is taken against the appellant but no show cause notice is given to the appellant, and no personal hearing is given to appellant.
- C. That the order of respondents No.1 to 3 is illegal void ab-initio and non speaking.
- D. That the appellant is dismissed from the service without conducting inquiry, which is mandatory under the law and yet not a single penny paid to the appellant.

- E. That if termination is on complaint basis then show cause notice is necessary before the termination order and even no final show cause notice is given to the appellant.
- F. That some other grounds may be adduced during the court of arguments.

It is, therefore, prayed that on acceptance of this appeal the termination order of the appellant may kindly be cancelled and the appellant may be re-instated in service along with back benefit.

Date: \_\_\_/\_\_\_/2016

Appellant

Through

**Muhammad Amin Khattak Lachi**  
 Advocate,  
 Supreme Court of Pakistan

**Ibrahim Shah**  
 Advocate, High Court,  
 Peshawar

**Noor Wali Khan**  
 Advocate, Peshawar

&

**Hayat Khan**  
 Advocate, Peshawar

4

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2016.

Zia Alam .....Appellant

**Versus**

Additional Agency education officer lower Kurram agency & others.  
..... Respondents

**A F F I D A V I T**

I, Zia Alam Son Of Noor Alam R/O Village Gogani, Post Office Sadda, Tehsil Central Kurram Agency, do hereby solemnly affirm and declare that the contents of the accompanying **appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this learned court.

Deponent



5

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2016

Zia Alam .....Appellant

**Versus**

Additional Agency education officer lower Kurram agency & others.  
..... Respondents

**ADDRESSES OF PARTIES**

**PETITIONER:**

1. Zia Alam Son Of Noor Alam R/O Village Gogani, Post Office  
Sadda, Tehsil Central Kurram Agency, District Kurram Agency.

**RESPONDENTS:**

1. Additional Agency education officer lower Kurram agency.
2. Agency Education Officer Lower Kurram Agency.
3. Assistant Education Officer Lower Kurram Agency.
4. Director of Education FATA KPK Peshawar.
5. Agency Account Officer Parachinar.

Appellant

Through

**Muhammad Amin Khattak Lachi**  
Advocate,  
Supreme Court of Pakistan

&

**Noor Wali Khan**  
Advocate, Peshawar

# درخواستیں مطلوب ہیں

7

تحریک جمہوریت کے برائے قومی اور ریاستی اداروں میں مختلف نوعیت کی خالی اسامیوں کو خالصتاً برسرِ کار کرنے کیلئے کامیابی کے حصول کیلئے درخواستیں قبول کی جاتی ہیں۔ درخواستیں 10 نومبر 2012ء کو جمع کرنا ہوں گے۔ درخواستیں جمع کرنا ہوں گے۔ درخواستیں جمع کرنا ہوں گے۔

سلسلہ	اسامیوں کی تفصیل	تاریخ	پارہ	تعداد	نوٹ
1	ایس ایف ایف	30-11-2012	پارہ 1	35	کسی بھی تنظیم شدہ فورسز سے متعلقہ ایس ایف ایف کی درخواستیں قبول کی جائیں گی۔
2	ایس ایف ایف	03-12-2012	پارہ 1	ایسا	ایسا
3	ایس ایف ایف	04-12-2012	پارہ 1	ایسا	ایسا
4	ایس ایف ایف	05-12-2012	پارہ 1	ایسا	ایسا
5	ایس ایف ایف	06-12-2012	پارہ 1	ایسا	ایسا
6	ایس ایف ایف	07-12-2012	پارہ 1	ایسا	ایسا
7	ایس ایف ایف	10-12-2012	پارہ 1	ایسا	ایسا
8	ایس ایف ایف	11-12-2012	پارہ 1	ایسا	ایسا
9	ایس ایف ایف	12-12-2012	پارہ 1	ایسا	ایسا
10	ایس ایف ایف	13-12-2012	پارہ 1	ایسا	ایسا
11	ایس ایف ایف	14-12-2012	پارہ 1	ایسا	ایسا
12	ایس ایف ایف	17-12-2012	پارہ 1	ایسا	ایسا
13	ایس ایف ایف	18-12-2012	پارہ 1	ایسا	ایسا
14	ایس ایف ایف	20-12-2012	پارہ 1	ایسا	ایسا
15	ایس ایف ایف	21-12-2012	پارہ 1	ایسا	ایسا
16	ایس ایف ایف	21-12-2012	پارہ 1	ایسا	ایسا
17	ایس ایف ایف	24-12-2012	پارہ 1	ایسا	ایسا
	ایس ایف ایف	25-12-2012	پارہ 1	ایسا	ایسا

نوٹ: (1) مقررہ تاریخوں کے بعد درخواستیں قبول نہیں کی جائیں گی۔ (2) امیدواروں کے ڈیوٹیاں اور شناختی کارڈز میں متعلقہ حکومتی اداروں کی طرف سے فراہم کیے گئے ہونے والے اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درج ذیل امور سے متعلق درخواستیں قبول کی جائیں گی۔ (3) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (4) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (5) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (6) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (7) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (8) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (9) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (10) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (11) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (12) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (13) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (14) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (15) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔ (16) اساتذہ البیادوں کی تقرری خیر و بدخواہی کے سلسلے میں درخواستیں قبول کی جائیں گی۔

STAMP



ADD: AGENCY EDUCATION  
 OFFICE SADDA KURRAM AGENCY  
 PHONE: 0974-300174  
 No. \_\_\_\_\_  
 Dated Sadda: \_\_\_\_\_

APPOINTMENT:

Consequent upon the approval of the Selection Committee, the appointment of the following PET Male teachers are hereby ordered in the school noted against their names against vacant posts purely on Regular contract basis in SPS No-9 Plus usual allowances as admissible under the rules with effect from 01.03.2013

S No	Name of Candidate	Father Name	School where Appointed	Remarks
1	Sajid Behman	Haj Majeed Khan	GMS Dappa	Against Vacant Post
2	Zia ul Alam	Noor Alam	GMS Amareena	Against Vacant Post
3	Gul Hassan	Khan Babacar	GMS Mamay	Against Vacant Post
4	Kilayat ullah	Mir Jehan	GMS Amal Baza	Against Vacant Post

TERMS/CONDITIONS:

- 1 They are directed to produce their Medical certificate from the Medical Supdt:AHQ Hospital Sadda Kurram Agency.
- 2 Their age should be between 18-35 years and 19-40 for Female..
- 3 Their appointment is purely made on temporary and Regular contract basis and liable to termination at any time without assigning any notice in case they wants to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
- 4 No payment will be made to the appointee until and unless their academic and professional certificate are got verified from the issuing Authorities concerned.
- 5 If they failed to take over charge within 15 days, their appointment will automatically be considered as cancelled.
- 6 Charge reports should be submitted to the concerned authorities.
- 7 Their appointment will be consider as regular but without Pension/gratuity on the term of section-15 of the KPK Civil Servant Act 1973 as amended with civil servants amendment Act: 2003 but will be entitled to contribution Provident Fund at such rate as may be prescribed by the govt.

*[Signature]*  
 Add. Agency Education Officer  
 Lower & Central Kurram Sadda

No. 193-201 / Edu Dated 15/1 2013  
 Copy forwarded to the:

1. Director of Education FATA, KPK Peshawar
2. Agency Account officer Parachinar
3. Political Agent Kurram Parachinar
4. Asstt: Political Agent Central Kurram
5. Teachers Concerned.
6. Headmaster concerned

**ATTESTED**

80

CHARGE REPORT

Certified that Miss/Mr Zia ul Alam have taken over charge of  
this day 16/01/2013 fore Noon of the office of PET post at GMS Khazena  
Kurram Agency vide Add:Agency Education Officer Satta Endst No 193-20 /dated 15/01/2013

Name ZIA. ULALAM

Signature of Receiving:

Govt: Servant Zia

[Signature]  
Add: Agency Education Officer  
Satta Kurram Agency



[Signature]  
16/1/13

CHARGE REPORT

Certified that Miss/Mr Zia ul Alam have taken over charge of  
this day 16/01/2013 fore Noon of the office of PET post at GMS Khazena  
Kurram Agency vide Add:Agency Education Officer Satta Endst No 193-20 /dated 15/01/2013

Name ZIA. ULALAM

Signature of Receiving Zia

Govt: Servant \_\_\_\_\_

~~ATTENDED~~

[Signature]  
Add: Agency Education Officer  
Satta Kurram Agency



[Signature]

Better copy-

9A

Additional Agency Education Officer  
Lower & Central Kurram Agency.

NO 287-93/Edu

Dated 11/12/2015

**TERMINATION ORDER**

Consequent upon the direction by the competent authority, Director of Education FATA Peshawar vide his No 12228 dated 07.12.2015, on the decision of oversight committee the following in-eligible teaching/Non teaching appointees (M/F) BPS (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S #	Name	Father Name	Desg:	B P S	Name of Institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota.
2	Muhammad Asif	Syal Khan	CT	9	GHS Makhizai	Terminated due to excess in sub divisional quota & advance appointment against on fill post.
3	Sara Bibi	Sakhi Mar Jan	DM	9	GGMS Bagan	DM diploma found fake & bogus.
4	Shahid Mehmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad Usman	Haji Shah Wazir	PET	9	GMS Arawali	Having no professional qualification.
6	Muhammad Alam Khan	Salam Khan	I/C	7	GHS Makhizai	Failed in typing test & rejected by enquiry officers.
7	Zulair Khan	Ghafoor Khan	I/C	7	GDC Bagan	Rejected by PA enquiry.
8	Muhammad Sadiq	Gul Mar Jan	I/C	7	GGDC Alizai	Failed in typing test as per advertisement & rejected by enquiry officers.
9	Sakhi Akbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officers.
10	Sadia Batool	Abid Alam Jan	Lab/A-sstt	7	GGDC Alizai	Documents not provided for verification.
11	Muhammad Saeed	Zar Bat Khan	CT	9	GHS Bazar	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota.
13	Latif Hussain	Inam Hussain	CT	9	GHS Angori	Domicile holder of upper kurram.
14	Wahid Zaman	Zawta Khan	CT	9	GHS Dogar	Terminated due to excess in sub divisional quota
15	Farooq Muhammad	Arab Gul	CT	9	GMS Taudy Oby	Out of merit (M.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogar No-2	Terminated due to excess in sub divisional quota.

ATTACHED

*[Handwritten signature]*

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17	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS Tabi Khonikhel	Terminated due to excess in sub divisional quota.
18	Samreen Sadaf	Haji Amin Khan	DM	9	GGMS Tarali	Documents not provided for verification.
19	Shamim Bibi	Spin Gul	DM	9	GGMS Dogar NO-2	Having no DM certificate & has not provide BA degree for verification.
20	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM certificate & has not provide BA degree for verification.
21	Bibi Jamila	Niaz Bahadar Khan	DM	9	GGMS Tabi khonikhel	Having no DM certificate/diploma
22	Sajid Rehman	Haji Haider Khan	PET	9	GMS Dappa	JDPE diploma found fake & bogus.
23	Zia ul Alam	Noor Alam	PET	9	GMS Khazeeana	JDPE diploma found fake & bogus.
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jlamai	JDPE diploma found fake & bogus.
25	Kifayatullah	Mir Jehan	PET	9	GMS Kimal Baza	Having no professional documents.
26	Zar Taj Bibi	Haji Ajmir Khan	PET	9	GGMS Ossai	Having no professional documents & Lower Kurram domicile holder while she was appointed in Central Kurram, also appeared in CT (LK) while appointed as PET (CK).
27	Sajid Rehman	Said Aslam Khan	I/C	7	GHS Paloseen	Has been excluded by PA enquiry.
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatoo	Failed in typing test as per advertisement & rejected by enquiry officers.

Addl: Agency Education Officer  
Lower & Central Kurram Sadda.

No. 2987-93 /Edu: Dated 11 / 12 /2015

Copy for information to the:-

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency.
4. Agency Account Officer Kurram Agency.
5. Assistant Political Agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/Headmasters concerned for similar action.

Addl: Agency Education Officer  
Lower & Central Kurram Sadda.

To,

The Director of Education FATA

***Appeal against the order of ADD: Agency Education Officer Kurram Agency whereby the services of the appellant have been terminated on 11.12.2015.***

10

Sir,

That the appellant state as under;

- That according to advertisement dated 23/10/2012 the appellant applied for the position of Physical Education Teacher PET.
- That the appellant having the requisite qualification BA hons and master degree holder in International Relation etc.
- That the interview was held on 20/12/2012.
- That appellant were selected and appointed as a PET Physical Education Teacher in GMS Khazeena Central Kurram dated 16/01/2013.
- That the appellant have a qualified candidate of the time for this post and no body has effected.
- That feeling aggrieved from the order the appellant have come your honor on the following grounds:

**GROUND**

- That the all acts and action of the department is against the law, facts, hence liable to be set aside/
- That the department has ignored the facts that that the appellant have performed the duties for 34 months.
- That the department has not followed the law of the superior courts.
- That the selection was according to law and rules by the department and the appellant was the only qualified candidate of the said vacant post.

It is therefore most humbly prayed that on acceptance of this appeal, the appellant may kindly be reinstated in service with all back benefits the appellant will be very grateful you.

APPELLANT ZIA ALAM PET  
Contact No. 03068024169

21-12-2015

MAILED



# Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

No. SUIT-11-VER-120911-03 - 2820

January 21, 2013

To,  
The Additional Agency Education Officer,  
Sadda,  
KURRAM AGENCY.

Subject: Verification.

Memo: Reference your vide letter No.0317/Edu.  
Dated: January 16, 2013

It is to certify that the following students was bonafied students of this University in Junior Diploma in Physical Education – (JDPE) program as mentioned below in detail. He has successfully passed his program from this University.

JDPE	06-sp-07757	Sajid Rehman	Haider Khan	Spring 2010	Verified-DMC No. 07287
JDPE	07-sp-07756	Gul Hassan	Khan Bahadar	Spring 2010	Verified-DMC No. 07288
JDPE	07-sp-05656	Zia ul Alam	Noor Alam	Spring 2011	Verified-DMC No. 07289
JDPE	07-sp-05751	Shahid Mehmood	Ha. Saeed Shah	Spring 2011	Verified-DMC No. 07290

*B. H.*  
21/01/2013  
*Barkat Ali Anwar Siddiqui*  
Assistant Controller of Examinations  
Degree – SUIT



# 36-B, Chinar Road, University Town, Peshawar-Pakistan  
Tel : +92-91-5846508-9, 5846516-8, Fax : +92-91-5841460

ATTESTED



گورنمنٹ مڈل سکول خیرپنہ وسطی کیم ایجنسی  
 رجسٹر حاضری مدرسین

ایستادہ اکتوبر

12

نام	اسرار الدین			شمس الدین			محمد یونس			محمد عبدالقدیر		
	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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ATUL

دستخط ایستادہ / ایستادہ صاحب

گورنمنٹ ہائی اسکول خیر نیہہ سنٹرل کرم ایجنسی

48

GMS Khajeema e K

ریسرچ حاضری مدرسین

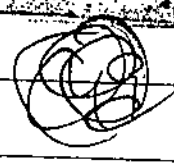
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بابت ماہ مارچ

نام عدہ تاریخ	صباح العالم		نام ٹیمس البرین	
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دستخط بیزا مسز صاحب / بیڑا مسز صاحبہ

گورنمنٹ مڈل سکول خزمینہ سنٹرل کرم  
ریسٹریٹری مدرسیں  
2013



ماہ اپریل

13

ضیاء العالم				D.M				C.T				C.T				نام
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آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	تاریخ آمد
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گورنمنٹ ہائر سکول فریڈ سٹریٹ کراچی  
 ریجنل حاضری دفتر

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P.E.T																																																	
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میزان	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل																																	
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>میزان</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>																میزان	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل																	
میزان	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل																																	
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>میزان</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> <td>میل</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>																میزان	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل																	
میزان	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل	میل																																	

دستخط ریجنل انسپکٹر / ریجنل سٹیشن ماسٹر

گورنمنٹ ڈال سکول فریڈین سٹریٹ کراچی  
 ریجنل جونیئر مدرسیں

150

بابت ماہ جون

نمبر	C.T				D.M				P.E.T				نام
	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	
1													
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31													
شماره	محل	ماتہ	میزان	محل	ماتہ	میزان	محل	ماتہ	میزان	محل	ماتہ	میزان	محل
تاریخ													
استحقاق													
بندی													
میزان													

دستخط پرنسپل صاحب / پرنسپل صاحب

گورنمنٹ مڈل سکول فریڈ  
ریسرچاضری مدرسین

2013  
۶۶۶

(22)

بیت ماہ جولائی

نام  
16

پہاڑی العالم  
P. E. T

عدہ

تاریخ آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	
۱																				
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تصطلح  
پہاڑی عالم  
P. E. T

شہر دست	مل	بیت	میران	مل	بیت	میران	مل	بیت	میران	مل	بیت	میران
انتہی												
احتمالی												
بدلی												
میران کل												

دستخط پیدائش صاحب / پیدائش صاحب

17

گورنمنٹ مڈل اسکول فریسنہ روڈ سٹی ٹرم  
2013  
ریجنل حاضری مدرسین

بابت سالہ الحوت

نام  
عدہ  
تاریخ  
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نام	P.E.T				D.M.				C.T				C.T				نام
عدہ	P.E.T				D.M.				C.T				C.T				عدہ
تاریخ	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	تاریخ
1	7/30		12/30														1
2																	2
3	7/30		12/30														3
4	SUNDAY																4
5	7/30		12/30														5
6	7/30		12/30														6
7	7/30		12/30														7
8	7/30		12/30														8
9																	9
10																	10
11																	11
12	7/30		12/30														12
13	7/30		12/30														13
14	7/30		12/30														14
15	7/30		12/30														15
16	7/30		11/30														16
17	7/30		12/30														17
18	Sunday																18
19	7/30		12/30														19
20	7/30		12/30														20
21	7/30		12/30														21
22	7/30		12/30														22
23	7/30		11/30														23
24	7/30		12/30														24
25	Sunday																25
26	7/30		12/30														26
27	7/30		12/30														27
28	7/30		12/30														28
29	7/30		12/30														29
30	7/30		11/30														30
31	7/30		12/30														31
حاضریت	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	مل	حاضریت
انتہی																	انتہی
امتحان																	امتحان
پہلی																	پہلی
بیزان																	بیزان

last day of the month

59  
18

گورنمنٹ مڈل سکول ضریف سترک کرم  
ریسرچ حاضری مدرسین

بیتابہ ستمبر

نام	ضیاء العالمیہ				C.T				C.T				نام				
	D.M		P.E.T		C.T		C.T		C.T		C.T		عمدہ				
تاریخ	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	تاریخ
1	SUNDAY																
2				Hand 12/30				Hand 7/30									2
3				Hand 12/30				Hand 7/30									3
4				Hand 12/30				Hand 7/30									4
5				Hand 12/30				Hand 7/30									5
6				Hand 11/30				Hand 7/30									6
7				Hand 12/30				Hand 7/30									7
8	SUNDAY																
9				Hand 12/30				Hand 7/30									9
10				Hand 12/30				Hand 7/30									10
11				Hand 12/30				Hand 7/30									11
12				Hand 12/30				Hand 7/30									12
13				Hand 11/30				Hand 7/30									13
14				Hand 12/30				Hand 7/30									14
15	SUNDAY																
16				Hand 12/30				Hand 7/30									16
17				Hand 12/30				Hand 7/30									17
18				Hand 12/30				Hand 7/30									18
19				Hand 12/30				Hand 7/30									19
20				Hand 11/30				Hand 7/30									20
21				Hand 12/30				Hand 7/30									21
22				Hand 12/30				Hand 7/30									22
23				Hand 12/30				Hand 7/30									23
24				Hand 12/30				Hand 7/30									24
25				Hand 11/30				Hand 7/30									25
26				Hand 12/30				Hand 7/30									26
27				Hand 12/30				Hand 7/30									27
28				Hand 12/30				Hand 7/30									28
29				Hand 12/30				Hand 7/30									29
30				Hand 12/30				Hand 7/30									30
31				Hand 12/30				Hand 7/30									31

دستخط پریماٹر صاحب / ہیڈ ماستر صاحب



(8)

19

G.M.S Khazeeana C.K.

3/10/03

رہنما حاضری مدرسین

بابت ماہ اکتوبر

نام	ذی القعدة		ذی الحجة		ذی القعدة		ذی الحجة		نام
	آمد	رواگی	آمد	رواگی	آمد	رواگی	آمد	رواگی	
D.M									
P.E.T									
C.T									
C.T.S									
1			1/00	8/00					
2			1/00	8/00					
3			1/00	8/00					
4			12/00	8/00					
5			1/00	8/00					
6	SUNDAY								
7			1/00	8/00					
8			1/00	8/00					
9			1/00	8/00					
10			1/00	8/00					
11			12/00	8/00					
12			1/00	8/00					
13	SUNDAY								
14			1/00	8/00					
15			1/00	8/00					
16			1/00	8/00					
17			1/00	8/00					
18			12/00	8/00					
19			1/00	8/00					
20	SUNDAY								
21			1/00	8/00					
22			1/00	8/00					
23			1/00	8/00					
24			1/00	8/00					
25			12/00	8/00					
26			1/00	8/00					
27	SUNDAY								
28			1/00	8/00					
29			1/00	8/00					
30			1/00	8/00					
31			1/00	8/00					

رہنما بڑا صاحب / بیٹا سہیل صاحب

بابت ماہ نومبر

20  
نام

D.M		ضیاء العالم				P.E.T				C.T				C.T				عدد
دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	تاریخ آمد		
			Zaira 11.00		Zaira 8.00											1		
			Zaira 11.00		Zaira 8.00											2		
			Zaira 11.00		Zaira 8.00											3		
			Zaira 12.00		Zaira 8.00											4		
			Zaira 11.00		Zaira 8.00											5		
SUNDAY																		
			Zaira 11.00		Zaira 8.00											6		
			Zaira 11.00		Zaira 8.00											7		
SUNDAY																		
تفصیلی ریکارڈ																		
			Zaira 11.00		Zaira 8.00											18		
			Zaira 11.00		Zaira 8.00											19		
			Zaira 11.00		Zaira 8.00											20		
			Zaira 12.00		Zaira 8.00											21		
			Zaira 11.00		Zaira 8.00											22		
SUNDAY																		
			Zaira 11.00		Zaira 8.00											23		
			Zaira 11.00		Zaira 8.00											24		
			Zaira 11.00		Zaira 8.00											25		
			Zaira 11.00		Zaira 8.00											26		
			Zaira 11.00		Zaira 8.00											27		
			Zaira 12.00		Zaira 8.00											28		
			Zaira 11.00		Zaira 8.00											29		
SUNDAY																		
																30		
																31		

میزان	میل	میل	میزان	میل	میل	میزان	میل	میل	میزان	میل	میل	میزان	میل	میل	میزان

دستخط و امضاء صاحب /  
 ATTACHED

گورنمنٹ مڈل سکول فرینڈ وسٹی کرم  
ریجنل حاضر می مدرسین

بابت ماہ دسمبر ۱۹۷۳

نام	پہراہی العالم		C.T		C.T		نام											
	D.M	P.E.T	C.T	C.T	C.T	C.T												
عدد	دستخط	رواجی	دستخط	آمد	دستخط	رواجی	دستخط	آمد	دستخط	رواجی	دستخط	آمد	دستخط	رواجی	دستخط	آمد	دستخط	
	SUNDAY																	
۱			Start 11:30	Start 8:30														
۲			Start 11:30	Start 8:30														
۳			Start 11:30	Start 8:30														
۴			Start 11:30	Start 8:30														
۵			Start 11:30	Start 8:30														
۶			Start 12:00	Start 8:30														
۷			Start 11:30	Start 8:30														
۸	SUNDAY																	
۹			Start 11:30	Start 8:30														
۱۰			Start 11:30	Start 8:30														
۱۱			Start 11:30	Start 8:30														
۱۲			Start 11:30	Start 8:30														
۱۳			Start 11:30	Start 8:30														
۱۴			Start 12:00	Start 8:30														
۱۵			Start 11:30	Start 8:30														
۱۶	SUNDAY																	
۱۷			Start 11:30	Start 8:30														
۱۸			Start 11:30	Start 8:30														
۱۹			Start 11:30	Start 8:30														
۲۰			Start 12:00	Start 8:30														
۲۱			Start 11:30	Start 8:30														
۲۲	SUNDAY																	
۲۳	لیکچر																	
۲۴	۲۷																	
۲۵	۲۸																	
۲۶	۲۹																	
۲۷	۳۰																	
۲۸	۳۱																	
۲۹	۱																	
۳۰	۲																	
۳۱	۳																	

لیکچر  
۲۷  
۲۸  
۲۹  
۳۰  
۳۱

شہزاد	مل	مل	میران	مل	مل	میران	مل	مل	میران	مل	مل	میران	مل	مل	میران	مل	مل	میران
انتہی																		
انتہی																		
بدی																		
میران کل																		

گورنمنٹ مڈل سکول ضلع سندھ کراچی  
ریجنل ڈائری

2014

۱۹

22

ایستادہ جنوری

پہنچاؤ الفانم

P. E. T

نام

عدہ

تاریخ آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	
۱																				
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تفصیلاً درج ذیل کے ناموں کے لئے  
 ایف ڈی کے ذریعہ  
 تفصیلاً درج ذیل کے ناموں کے لئے  
 ایف ڈی کے ذریعہ

تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	تفصیلاً درج ذیل کے ناموں کے لئے	ایف ڈی کے ذریعہ	

ATTESTED

دستخط ایف ڈی کے ذریعہ



گورنمنٹ پبلک سکول، فریڈن ہسٹریل کیم  
 ریٹرن حاضر کی مدرسین

24

بیت ماہ البریل

نام	نواز حسین				شیراز عالم				نام			
	C.T		C.T		P.E.T		S.E.T					
عدد	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط
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31												

تعداد روز مجموع ہزار

SUNDAY

SUNDAY

SUNDAY

بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل
بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل
بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل
بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل	بریل



گوردفینڈا ڈول سلولز خلیفہ و سولڈیئر  
ریسرچ افسری مدرسین  
2014ء

ایستادہ جون

نام	ضریح العالم						ضریح حسین					
عمدہ	P. E. T						C. T					
تذکرہ آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد
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کوئی نہیں ہے  
تعمیراتی کاموں کے لیے  
موجود ہے



گورنمنٹ میڈل سکول فرینڈس روڈ ملتان 2017  
 رجسٹرڈ ماسٹر / مدرسین

63  
 27

بابت ماہ جولائی

نواز حسین				C.T				ضیاء العالم				S.E.T				نمبر
C.T		C.T		P.E.T.		S.E.T		S.E.T		S.E.T		S.E.T				
دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	
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میزان		مل		میزان		مل		میزان		مل		میزان		مل		

نہایت

میزان مل

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دستخط میزبان صاحب / میزبان صاحب

G.M.S Khazeeza C.K  
 2014  
 رجسٹرڈ حاضر فی مدرسین

78

August

نام	Nawaz Hussain			C.T			C.T			P.E.T			S.E.T			نام
عدد	C.T			C.T			P.E.T			S.E.T			عدد			
درج	درج	درج	آمد	درج	درج	آمد	درج	درج	آمد	درج	درج	آمد	درج	درج	آمد	
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تہہ																
انتہی																
استقامت																
بدلی																
میران کی																

رجسٹرڈ حاضر فی مدرسین

G.M.S Khazeena C.K.

2014  
19

رئیس تدریس مدرسه

September ستمبر

29

Newaz Hussain												ضیاء العالم												نام
C.T				C.T				P.E.T				S.E.T				عدد								
دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	تاریخ								
نواز	17/30	نواز	7/30					نواز	12/30	نواز	7/30					1								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					2								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					3								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					4								
نواز	11/30	نواز	//					نواز	12/30	نواز	7/30					5								
نواز	12/30	نواز	//					نواز	12/30	نواز	7/30					6								
SUNDAY																								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					8								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					9								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					10								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					11								
نواز	11/30	نواز	//					نواز	11/30	نواز	7/30					12								
نواز	12/30	نواز	//					نواز	12/30	نواز	7/30					13								
SUNDAY																								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					15								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					16								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					17								
نواز	11/30	نواز	//					نواز	12/30	نواز	7/30					18								
نواز	11/30	نواز	//					نواز	11/30	نواز	7/30					19								
نواز	12/30	نواز	//					نواز	12/30	نواز	7/30					20								
SUNDAY																								
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نواز	//	نواز	//					do								24								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					25								
نواز	11/30	نواز	//					نواز	11/30	نواز	7/30					26								
نواز	12/30	نواز	//					نواز	12/30	نواز	7/30					27								
SUNDAY																								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					29								
نواز	//	نواز	//					نواز	12/30	نواز	7/30					30								
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مهرت	مل	مل	مل	میران	مل	میران	مل	میران	مل	میران	مل	میران	مل	میران	مل	مهرت								
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																اعتقاد								
																بدلی								
																میران کی								

رئیس تدریس / مدرسہ

2014

G.M.S Khazeeha C.K.

30

2014  
19

رجسٹر حاضر فی مدرسین

October ایست ماه

Nawaz Hussain				ایزابا الہی				Nawaz Hussain							
C.T				C.T				P.E.T				S.E.T			
آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
SUNDAY															
(3 روز تعطیل عبداللہ صفا 6، 7، 8 اکتوبر)															
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
11/30	خواز	خواز	خواز					11/30	خواز	8/00	خواز				
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
SUNDAY															
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(leave)															
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11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
11/00	خواز	خواز	خواز					11/00	خواز	8/00	خواز				
تعمیلات صبر الحرام سر															

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جمعہ

G. M. S. Khazeeza C.K.

2014

رئيسة حاضری مدرستین

November

31

Nawaz Hussain			C.T			P.E.T			S.E.T			نام
C.T			C.T			P.E.T			S.E.T			عمدہ
آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی	تاریخ
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دستخط پرنسپل / پرنسپل صاحب

2014  
1436

December بابت ماہ دسمبر

نام Nawaz HUSAIN  
P.E.T C.T  
نام آغا والہ عالم

نام	بابت ماہ دسمبر											
عدد	P.E.T						C.T					
ترجہ آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد
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کے حضور میں آج 23 دسمبر کو حاضر ہوئے۔  
 حضور کی خدمت میں آج 23 دسمبر کو حاضر ہوئے۔

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بابت ماہ 2015

نواز حسین		C.T		نورباہ العالم				S.E.T				نام	
C.T		C.T		P.E.T				S.E.T				عددہ	
دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	آمد
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دستخط پیر صاحب / پیر سوس صاحب

سٹاف حاضری رجسٹر مڈل سکول خیزیہ وسطی نم

2015

سال: (3)

نمبر: (2)

اپریل (4)

34

C.T					P.E.T					S.E.T					نام:
C.T					P.E.T					S.E.T					عہدہ:
C.T					P.E.T					S.E.T					فون نمبر:
C.T					P.E.T					S.E.T					قومی شناختی کارڈ نمبر:
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	
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تفصیل رخصت

میزان	بیماری	استقامت	انتقام	میزان	بیماری	استقامت	انتقام	میزان	بیماری	استقامت	انتقام

دستخط رئیس ادارہ:

Master Book Center, 16-Urdu Bazar Lahore.  
Tel: 042-3722205, 37357732. Email: masterbookcenter@yahoo.com

تاریخ:



# سٹاف حاضری رجسٹر

مڈل کلاس فریڈ  
سال: 2015  
نمبر: 3

نمبر: (رج)

سیکشن: 7A  
نمبر: 35

نام:		عہدہ:		فون نمبر:		قومی شناختی کارڈ نمبر:	
CT	پناہ العالم	PET	SET				
تاریخ	آمد	دستخط (N)	رواگی	دستخط	آمد	دستخط (N)	رواگی
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مہاجان	سابقہ	میزان	اقاقیہ	اختصاصیہ	بہاری	میزان	اقاقیہ	اختصاصیہ	بہاری	میزان

Master Book Center

دستخط رئیس ادارہ:

Master Book Center, 16-Urdu Bazar Lahore.  
Tel: 042-3751205-3751732. Email: mas@masterbookcenter.com

تاریخ:

# سٹاف حاضری رجسٹر

سال: 2015  
نمبر: (3)

نمبر: (2)

نمبر: (1)

36

C.T		لیبا والہ عالم P.E.T			S.E.T			عہدہ:	فون نمبر:	قوی شناختی کارڈ نمبر:
آمد	دستخط	دستخط (N)	رواگی	آمد	دستخط	دستخط (N)	رواگی	آمد	دستخط	تاریخ
				7/30						1
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				SUNDAY						15
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تفصیل رخصت

امصال	سابقہ	میزان	انفاقہ	استحقاقہ	بیماری	میزان	انفاقہ	استحقاقہ	بیماری	میزان	انفاقہ	استحقاقہ	بیماری

دستخط رئیس ادارہ:

Master Book Center, 15-Urdu Bazar Lahore.  
Tel: 042-3723205, 3723732, Email: mbc@masterbookcenter.org.pk

تاریخ:

ط گورنمنٹ نیشنل سکول فریضہ  
سنٹرل کرم  
سٹاف حاضری رجسٹر

سال: 2015  
نمبر: (13)

نمبر: (2)

پرانی

نمبر: (12)

37

C.T				S.F.T				S.F.T				نام:	
C.T				S.F.T				S.F.T				عہدہ:	
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C.T				S.F.T				S.F.T				قومی شناختی کارڈ نمبر:	
تاریخ	آمد	دستخط	(N) دستخط	رواگی	دستخط	(N) دستخط	رواگی	دستخط	آمد	دستخط	(N) دستخط	رواگی	دستخط
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(نمبر گورنمنٹ نیشنل سکول فریضہ)

تعلیمات کو عملی کرنا

لکھنؤ ہاؤس

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تفصیل رخصت											
ماہ	سابقہ	میزان	انفاقہ	استحقاقہ	بیماری	میزان	انفاقہ	استحقاقہ	بیماری	میزان	انفاقہ

دستخط رئیس ادارہ:

Master Book Center, 16-Urdu Bazar, Lahore.  
Tel: 042-3723205, 3725732, Email: masterbookcenter@yahoo.com

تاریخ:

38

گورنمنٹ میڈیکل کولج مظفر پور  
سنہ 2015 سال  
نمبر 3

# سٹاف حاضری رجسٹر

بابت ماہ  
نام: مو  
عہدہ:

بابت ماہ: اگست  
نمبر: 1

نمبر: 2

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صباہ العالم  
P-E-T

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نام:

عہدہ:

فون نمبر:

قوی شناختی کارڈ نمبر:

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تفصیل رخصت

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دستخط رئیس ادارہ:

تاریخ:

# ستاف حاضری رجسٹر

سال: 2015  
نمبر: (3)

نمبر: (2)

بابت ماہ: ستمبر  
نمبر: (1)

نام: \_\_\_\_\_  
عہدہ: \_\_\_\_\_  
فون نمبر: \_\_\_\_\_  
قومی شناختی  
تاریخ: \_\_\_\_\_

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دستخط رئیس ادارہ: \_\_\_\_\_ تاریخ: \_\_\_\_\_

40

# سٹاف حاضری رجسٹر

سال: 2015  
نمبر: 3

بابت ماہ: اکتوبر  
نمبر: 10

بابت

نام:	عہدہ:	فون نمبر:	قومی شناختی کارڈ نمبر:						
CT	P.E.T	S.E.T							
نام:	عہدہ:	فون نمبر:	قومی شناختی کارڈ نمبر:						
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	تاریخ
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تعمیرات شہادت کے تمام حصے  
پریم احمد

Handwritten signature and date: 10/10/15

تفصیل رخصت

ماہ	سابقہ	میزان	انفاقہ	استحقاقہ	بیماری	میزان	انفاقہ	استحقاقہ	بیماری	میزان	انفاقہ	استحقاقہ	بیماری	میزان

دستخط رئیس ادارہ:

Master Book Center, 16-Urdu Bazar Lahore.  
Tel: 992-3721205, 3731-731, Email: masterbookcenter@yahoo.com

تاریخ:

تاریخ:

## سٹاف حاضری رجسٹر

گورنمنٹ مڈل سکول عزیزینہ سنٹرل کیمپس سال: 2015  
 بابت ماہ: دسمبر نمبر: 3  
 نمبر: (29) نمبر: 3

نام:  
 عہدہ:  
 فون نمبر:  
 قومی شناختی کارڈ نمبر:

نام:	سہارا عالم	نام:
عہدہ:	P.E.T	عہدہ:
فون نمبر:		فون نمبر:
قومی شناختی کارڈ نمبر:		قومی شناختی کارڈ نمبر:

تاریخ	آمد	دستخط (N)	روایتی	دستخط	آمد	دستخط (N)	روایتی	دستخط	تاریخ
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3					11/30			8/30	3
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6	SUNDAY								6
7					11/30			8/30	7
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13	SUNDAY								13
14					11/30			8/30	14
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میزان	بیماری	استحقاقیہ	انفاقیہ	میزان	بیماری	استحقاقیہ	انفاقیہ	میزان	بیماری	استحقاقیہ	انفاقیہ

تاریخ: \_\_\_\_\_ دستخط رئیس ادارہ: \_\_\_\_\_  
 Master Book Center, 16-Urdu Bazar Lahore. Tel: 042-3723205, 37357132. Email: masterbookcenter@yahoo.com

10

47306



ایڈووکیٹ/دستخط  
بارکول ابار ایسوسی ایشن  
رابطہ نمبر: 0307-8364980

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

مسردس سرٹیفکیٹ

بعدالت جناب:

دعویٰ:	منجانب:
علت نمبر:	Appellant
موضوع:	شیاء مسلمہ
جرم:	مقام
تھان:	پشاور

بامث تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ مس  
 ان مقام پشاور کے لئے پشاور بار ایسوسی ایشن کو ذمیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقریر جالت و فیصلہ بر ملن دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق  
 ذریعہ پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا تاخیر یا اہل کی آزمائش اور منسوخی، نیز  
 دائر کرنے اہل عمرانی و نظریاتی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کاروائی کے واسطے اور ذمیل یا اختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب  
 مقرر شدہ کو بھی وہی عملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ملاحظہ پر ذرا احتیاط منظور قبول ہوگا دوران مقدمہ  
 میں جو خرچہ ہر جان التوائے مقدمہ کے سبب سے ہوگا وہ ذمیل موصوف و سون کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام  
 دورہ یا حد سے باہر ہو تو ذمیل صاحب پابند ہوں گے کہ پیروی مذکورہ کر سکیں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 25-04-2016

الع بد واہ شد الع بد

مقام کے لئے منظور ہے۔

شیخ الاسلام ولد نور اسلام



**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No: 488/2016

Zia Alam S/O Noor Alam R/O Village Gogani P/O Sadda Tehsil Central Kurram Agency.....Appellant.

**VERSUS**

1. Additional Agency Education Officer Lower Kurram Agency.
2. Agency Education Officer Lower Kurram Agency.
3. Assistant Education Officer Lower Kurram Agency.
4. Director Education FATA KPK Peshawar.
5. Agency Accounts Officer Parachinar .....Respondents.

**Para-wise comments on behalf of respondent No: 1 & 4**

**Respectively Sheweth:**

**Preliminary Objection**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law and no departmental appeal is filed to the competent authority against the impugned order. Hence not maintainable under Section-4 of Service Tribunal Act.

**On Facts:**

1. No comments. Pertains to record.
2. No comments. Pertains to record.
3. Incorrect. It has been clearly mentioned in the appointment order of the appellant that no payment will be made to the appointee until & unless their academic/professional certificate is got verified from the concerned institution. The Junior Diploma in Physical Education found fake and bogus therefore the services of the appellant has been terminated by the Competent Authority.
4. The respondent department in order to investigate/inquire the anomalies carried out in recruitment process in Kurram Agency held inquiries and constituted search Committee. It is pertinent to mention here that the responsible Officer was charge Sheeted and proposed to the Government for necessary action under E&D rules. However the salaries of those candidates whose degree's/certificates were verified by the over-sight committee were ordered to be initiate against all those involved in fakism and forgery, copy of letter annexed as (Annexure-A) also a letter No. 12229-36 dated 07/12/2015 was addressed to Additional Agency Education Officer, Lower and Central Kurram Agency for the release of salaries of eligible candidates and terminate in-eligible candidates, copy of letter attached as (Annexure-B).

Incorrect. No Departmental Appeal is made to the Competent Authority against

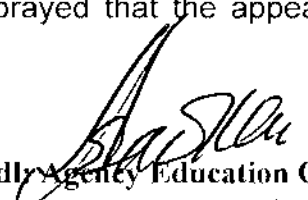
the impugned order hence not maintainable under section-4 of Service Tribunal Act-1974.

**Grounds:**

- A. Incorrect. No action has been taken by the respondents which are against law and facts. The impugned order has been passed by the Competent Authority in the interest of Public Service and in the interest of department.
- B. Incorrect. It has been clearly mentioned in the appointment order of the appellant at S.No.4 that no payment will be made until & unless his professional/Academic certificate gets verified from the concerned institution. Therefore on account of bogus degree service of the appellant has been terminated by the Competent Authority.
- C. Incorrect. As explained in Para-B above.
- D. Incorrect. On the basis of inquiry and verification the services of the appellant has been terminated by the Competent Authority, copy of the inquiry report attached for ready reference.
- E. No comments. As explained in Para-D above.
- F. Respondents seek permission to advance other grounds & proofs at the time of arguments.

In the light of the above stated facts it is humbly prayed that the appeal may kindly be dismissed.

Respondent NO. 1

  
Addl. Agency Education Officer  
Kurram Agency


Respondent NO. 4

  
Director Education FATA

**AFFIDAVIT**

We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 1

  
Addl. Agency Education Officer  
Kurram Agency

Respondent NO. 4

  
Director Education FATA



2

FATA SECRETARIAT  
DIRECTORATE OF EDUCATION  
WARSAK ROAD PESHAWAR, PAKISTAN  
PHONE: 091-9210165 FAX 091-9210216

NO. ....  
DATED ...../...../2015 E-7-6 MEETING FILE KC

Most Urgent.

To

The Additional Agency Education Officer  
Lower & Central Kurram Agency

Subject:

RELEASING OF PAY /SALARIES OF FRESH APPOINTEES,  
APPOINTED DURING 2012-13.

Memo:

Please refer to this Directorate Memo.No.1446 dated  
13/12/2014, addressed to Agency Accounts Officer Kurram Agency.

Consequent upon the recommendations of oversight  
committee, constituted by the competent authority, I am directed to inform  
you to release the salaries of eligible candidates appointed during 2012-13  
by your office as per enclosed lists attached duly signed by the over sight  
committee members and terminate in-eligible candidates as per lists  
attached with effect from the date of their appointments and if salaries paid to  
them be recovered from them accordingly.

<sup>sel</sup>  
Deputy Directress (Estab)

Endst.No. 12228-36  
Copy to;

Dated 7/12 2015

1. Political Agent Kurram Agency with the request to take action against the candidates as per enclosed lists appointed on fake documents as per rules.
2. Agency Education Officer Kurram Agency
3. Deputy Director (F/A) local Directorate.
4. Deputy Secretary Law & Order FATA Secretariat.
- ✓ 5. Assistant Director (Litigation) local Directorate.
6. PS to secretary AI&C FATA Secretariat.
7. PS to Secretary SSD FATA.
8. P.A to Director Education, FATA.

Deputy; Directress (Estab)

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ineligible  
Candidates



NO. 10118

DATED 30/9/2015 E-7-6 MEETING FILE KC

To

The Political Agent  
Kurram Agency

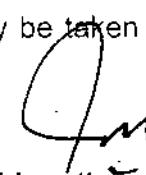
Subject: APPOINTMENT MADE BY MR. MOEEN GUL AAEO; AEO  
LK/CK.

Memo:

I am directed to refer to your letter No.5733 dated 30-4-2015 on the subject noted above and to state that on the recommendation of oversight Committee, the competent authority is pleased to dispose of instant case as under.

1. Being Appellate authority, the Political Agent concerned may dispose with the services of the ineligible candidate's initiate criminal cases against these appointees on fake documents and recover the salaries from them (list attached).
2. The eligible candidates may be retained and their salaries be released (list attached).

You are therefore requested that action may be taken at your end under intimation to all concerned.

  
o/c Director Education, FATA

Endst.No. 10119-25,  
Copy to;

Dated 30/9 2015

1. Agency Education Officer Kurram Agency at Parachinar.
2. Deputy Secretary Law & Order FATA Secretariat.
3. Deputy Director (F&A) local Directorate.
4. PS to Secretary FIFA FATA Secretariat.
5. Additional Agency Education Officer Lower/Central Kurram.
6. PS to Secretary SSD FATA.
7. PA to Director Education, FATA.

  
o/c Deputy Directress (Estab)

32

**TERMINATION ORDER:**

Consequent upon the direction by competent authority, Director of Education FATA Peshawar vide his no. 12228 dated 07-12-2015 on the decision of overnight committee the following in-eligible teaching/non-teaching appointees (m/F) BPA (7-9) appointed during January 2013 in Lower & Central Kurram are hereby terminated with effect from the date of their appointments. If salaries paid to them will be recovered from them accordingly.

S#	Name	F/ Name	Desg	B P S	Name of institution	Remarks
1	Aqib Zaman	Said Amir Shah	CT	9	GHS Bagan	Terminated due to excess in sub divisional quota
2	Muhammad Asif	Syal Khan	CT	9	GHS Makhuzu	in sub divisional quota & advanced appointment against on fill post
3	Sara bibi	Sakhimmar Jan	DM	9	GGMS Bagan	DM diploma found fake & bogus
4	Shahid Mehmood	Haji Sher Shah	PET	9	GMS Sraghurga	Diploma of JDPE found fake & bogus.
5	Muhammad usman	Haji Shah wazir	Pet	9	GMS Arawali	Having no professional qualification
6	Muhammad Alam Khan	Salam Khan	I/C	7	GHS Markuzai	Failed in typing test & rejected by enquiry officer.
7	Zubair Khan	Ghafoor Khan	I/C	7	GDC Bagan	Rejected by PA enquiry
8	Muhammad Sadiq	Gul Mar Jan	I/C	7	GGDC Ahzair	Failed in typing test as per advertisement & rejected by enquiry officer
9	Sakhi Akhbar	Sadiq Akbar	I/C	7	GHS Kochi	Failed in typing test as per advertisement & rejected by enquiry officer
10	Sadia Batool	Abid Alam Jan	Lab/A	7	GGDC	Documents not provided
11	Muhammad Saced	Zar bat Khan	CT	9	GHS	Terminated due to excess in sub divisional quota.
12	Muhammad Sadiq	Abdul Rasheed	CT	9	GMS Ossai	Terminated due to excess in sub divisional quota
13	Latif Hussain	Imam Hussain	CT	9	GHS Auggori	Domicile holder of upper Kurram
14	Wahid Zaman	Zawta Khan	CT	9	GH Dogar	Terminated due to excess in sub divisional quota
15	Farooq Muhammad	Arab Gul	CT	9	GMS Taudy oby	Out of merit (m.Ed has wrongly been considered in place of MA)
16	Ajmal Akbar	Akbar Khan	CT	9	GGMS Dogas No-2	Terminated due to excess in sub divisional quota

17	Bibi Sakina	Haji Gul Akbar	CT	9	GGMS tabi Khonikhel	Terminated due to excess in sub divisional quota
18	Samreen Sadaf	Haji Amin Khan	DM	9	GGMS Tarali	Documents not provided for verification
19	Shamin Bibi	Spin Gul	DM	9	GGMS Dogar No2	Having no DM Certificate & has not provide BA degree for verification
20	Parveen Bibi	Spin Gul	DM	9	GGMS Ossai	Having no DM Certification & has not provide BA Degree for verification
21	Bibi Jamila	Khan	DM	9	GGMS tabi khonikhel	Having no DM certificate / Déploma
22	Sajid Rahman	Haji Haider Khan	PET	9	GMS DApa	JDPE diploma found fake & bogus
23	Zia ul Alam	Noor Alam	Pet	9	GMS Khazecna	JDPE diploma found fake & bogus
24	Gul Hassan	Khan Bahadar	PET	9	GMS Jilamai	JDPE diploma found fake & bogus
25	.....	Mr. Jehan	PET	9	GMS Kunal Baza	Having no professional documents
26	Zar Taj Bibi	Haji Anmir Khan	Pet	9	GGMS Ossai	Having no professional documents & lower Kurram domicile holder while she was appointed in Central Kurram also appointed ...
27	Sajid Rehman	Said Adam Khan	I/C	7	GHS	He been expelled by pa enquiry
28	Siraj U Din	Walayat Khan	I/C	7	GHS Manatooo	Failed in typing test as per advertisement & rejected by enquiry officers.

Add. Agency Education Officer  
Lower & Central Kurram Sadda.

No 2987-93 /Edu dated 11-12-2015

Copy for information to the: -

1. Director of education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Additional Political Agent Kurram Agency
4. Agency Account Officer Kurram Agency.
5. Assistant political agent Lower Kurram.
6. Assistant Political Agent Central Kurram.
7. Principals/ Headmasters concerned for similar action

Add: Agency Education Officer.  
Lower & Central Kurram Sadda

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**

**PESHAWAR**

Service Case No.488/2016

Zia Alam ..... Appellant

Versus

Additional Agency Education Officer  
Lower Kurram Agency & others ..... Respondents

= = = = =

**REJOINDER ON BEHALF OF THE APPELLANT**

= = = = =

**Respectfully Sheweth:**

**Preliminary Objection:**

All the preliminary objections are on behalf of respondent No.1 & 4 are illegal and against the law and against the facts of the case.

**PARA WISE REPLY AND FACTS:**

1. Para No.1, needs no rejoinder.
2. Para No.2 is needs no rejoinder.
3. Para No.3 incorrect, the Diploma was verified by the concerned institution, which is annexed with appeal on Page No.16.
4. That Para No.4 pertains to the regards of the respondents no 1, and 4, however the appellant was going through all the legal formalities after which the appellant were selected and took charge according to the record of the appeal and serve his service for the continuous period of 33 months not a single penny were paid to the appellant, it is pertinent to mention that the diploma of the appellant were got verified and found correct.

5. Para No.5 is incorrect, the departmental appeal were filed on 24.12.2015, which is annexed with appeal on page No.12.

**GROUNDS:**

- A. Ground A of comments is incorrect, no legal action taken by the respondent against the appellant.
- B. Ground B of comments is incorrect, the penal action taken by the respondent is not absolute power of the respondent to detached their salary is against the law.
- C. Ground C of comments is incorrect, the order of respondents is non speaking.
- D. Ground D of comments is incorrect, the inquiry conducted by the respondents is based upon political motivation.
- E. Ground E of comments is incorrect, no final show cause notice is given to the appellant.

It is, therefore, prayed that on acceptance of this rejoinder the services of the appellant may kindly be restored alongwith all back benefits.

Appellant

Through

  
**Noor Wafi Khan Mughal**  
Advocate, Peshawar

Date: 30/01./2018



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

Service Case No.488/2016

Zia Alam ..... Appellant

Versus

Additional Agency Education Officer  
Lower Kurram Agency & others ..... Respondents

**A F F I D A V I T**

I, Zia Alam S/o Noor Alam R/o Village Gogani, Post Office Sadda Tehsil Central Kurram, District Kurram Agency do hereby solemnly affirm and declare that the contents of the accompanying **rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this learned court.

**ATTESTED**



  
Deponent

**VAKALATNAMA**

Before the KP Service Tribunal Peshawar

OF 2018

Zia Alam

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Educations Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We Zia Alam

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** 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 cost. 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.

Dated. \_\_\_/\_\_\_/2018

Zia Alam

CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK**

**MUHAMMAD MAAZ MADNI**  
ADVOCATES

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