19.05.2023

Clerk of learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant 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. Adjourned. To come up for arguments on 01.08.2023 before the D.B. Parcha Peshi given to the parties.

(Muhammad Akbar Khan) Member (E) (Salah-ud-Din) Member (J)

Naeem Amin

1st August, 2023 1. Learned counsel for the appellant present. Mr. Asif

Masood Ali Shah, Deputy District Attorney for the respondents

present.

Poshawar Poshawar 2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 27.09.2023 before the D.B. PP given to the parties.

1. Poplar

(Fareeha Paul)

Member (E)

(Rashida Bano) Member (J)

Kaleemullah

23.01.2023

Clerk to learned counsel for the appellant present.

Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.



Learned Assistant Advocate General seeks further time to contact the respondents for submission of reply/comments on the next date. Last opportunity is given. Adjourned. To come up for submission of reply/comments on 03.03.2023 before the SB.

(Mian Muhammad) Member (Executive)

3rd Mar, 2023

None for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for respondents present.

Neither any representative of the respondents is present nor did they submit written reply. The time provided in Rule-12 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 for filing reply is seven days before the date fixed but despite providing opportunity, the respondents have not filed the comments. They are thus placed ex-parte and their right to file reply stands struck off. To come up for arguments on 19.05.2023 before D.B. P. P. Sinch



(Kalim Arshad Khan) Chairman 13.09.2022

The worthy Chairman is on leave, therefore, the case is adjourned to 31.10.2022 for the same.

Reader

31.10.2022

Appellant present through counsel.

Naseer Ud Din Shah, learned Assistant Advocate General for respondents present.

SCANNED KPST Peshawar Reply not submitted. Learned AAG requested for time to submit reply/comments. Opportunity is granted. To come up for reply/comments on 08.12.2022 before S.B.

(Rozina Rehman) Member (J)

08/12.2022

Junior to counsel for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate

General alongwith Naseer Uddin Shah Superintendent for respondents present.

Reply not submitted. Representative of the respondents sought time for submission of written reply. Adjourned. To come up for written reply/comments on 23.01.2023 before S.B.

(Rozina Rehman) Member (J) 07.04.2022

Counsel for the appellant present.

Due to paucity of time, the case could not be heard. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 28.04.2022 before S.B.

(MIAN MUHAMMAD) MEMBER(E)

28.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Appellant Paposited
Security & rocess Fee

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 08.07.2022 before S.B.

(Rozina Rehman) Member (J)

08.07.2022

Due to Public Holiday on account of Eid-Ul-Adha case to come for the same on 13.09.2022

Reader

SCANNED KPST Peshawar The appeal of Mr. Shareefullah Khan Ex-Junior Clerk Education Department Lakki Marwat received today i.e. on 25.01.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is attached with the appeal.
- 2- Page No. 4& 5 of the memo of appeal are misprinted.
- 3- Copy of impugned withdrawal order of appointment of appellant mentioned in the memo of is not attached with the appeal which may be placed on it.

No.____/S.T,

Dt. 26/01 /2022

REGISTRAR

SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA

PESHAWAR.

Syed Noman Ali Bukhari Adv. Pesh.

Dobjection Remails

2. Objection Remails

3. Already meetre in man of opposed the Book of the Shrinks.

Let h-shrinks.

11-3-2022

₹>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEA	L'NO.	/2022

Shareef Ullah

V/S

Edu Deptt:

INDEX

S.NO.	DOCUHIMNTS	ANNEXURE	PAGE
1.	Memo of Appeal		1-7
2.	Copy of appointment order & medical Certificate	-A-	08-13
3.	Copy of attendance register	/ -B-	14-31
4.	Copy of departmental appeal	-F-	32-35
5.	WalakatNama		36

Appellant
Shareef Ullah

Through:

(SYED NOMAN ALI BUKHARI)

(UZMA SYED)
ADVOCATES, High Court

Cell NO: 0335-8390122

Office:

Room No. Fr#8, 4thFloor, Bilor Plaza, Sadar Bazar, Peshawar Cant.

Date: ____/___/2021.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

•		
A TOTAL TOTAL		2021
APPEAL NO.	,	71171
AFIDADIO.	,	

Mr. Shareef Ullah Khan S/o Saeed khan, Ex- Juni-or Clerk R/o Medad kheil, tehsil Saraye Norung, District Lakki Marwat.

(Appellant)

VERSUS

- 1. The Director Education, Elementary & Secondary Education Peshawar.
- 2. The District Education Officer (Male) lakki Marwat.

(Respondents)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACTS, 1974, AGAINST ILLEGAL STOPPAGE OF SALARY, AND AGAINST NOT DECIDING DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENT MAY BE DIRECTED TO RELEASE THE SALARY OF THE APPELLANT WITH ALL BACK BENIFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT

-RÉSPECTFULLY SUBMITTED:

FACTS:

- 1. That the appellant was appointed as Junior Clerk against the vacant post vide order dated 20.04.2017 on proper recommendation of departmental selection committee under deceased son Quota and posted at GHS Amir Muhammad wali. The appellant properly submitted his charge report/Arrival report and medical fitness certificate. (Copy of appointment order and medical certificate is attached as Annexure-A)
- 2. That the appellant has performed his duties assigned to him with zeal and devotion and there was no complaint, what so ever regarding his performance. Copy of attendance register is attached as annexure-B.
- 3. That the appellant performing his duties till September 2020 and suddenly the salary of the appellant has been stopped, when the appellant inquire about the stoppage of salary the clerk verbally told him the inquiry was constituted against the appellant but neither the inquiry nor the suspension order if any was communicated to the appellant, which is against the law, against which appellant filed departmental appeal which was not responded within statutory period of 90 days. (copy departmental appeal is attached as Annexure-C.)
- 4. Hence the appellant constrained to file the instant service appeal on the following grounds amongst others.

GROUNDS:

- A. That the verbal order and stoppage of salary are against the law, facts, norms of justice, and material on record, therefore not tenable and liable to be set aside.
- B. That the whole proceeding conducted by the respondent department is against the law and rules.
- C. That the appellant has been condemned unheard and has not been treated according to law and rules.

- D. That neither charge sheet, statement of allegation, show cause notice was served upon the appellant nor inquiry was conducted against the appellant, which was necessary and mandatory in law before taking adverse action which is violation of law, rules and norms of justice.
- E. That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- F. That not paying the monthly salaries to the appellant despite that the appellant was on the strength and performed his duty, actually amounts to an arbitrary act on the part of the respondents which is not tenable in the eyes of law:
- G. That the appellant has not been treated according to law and rules and has been deprived from the monthly salaries despite proper performance of duty, thus the action of the respondents is totally illegal and without lawful authority.
- H. That being a civil servant, the appellant is entitled to the salaries of the post in accordance with Section-17 of the Civil Servant Act, 1973.
- I. That according to superior court judgment the department cannot upheld the salary of the appellant for indefinite period.
- J. That the appellant has been condemned unheard and no prior chance of defenses or hearing was provided to the appellant while stopping his monthly salaries.
- K. That the stoppage of salary for such a long period without any sufficient reason is illegal against the law and natural justice.
- L. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as 2019 CLC 1750 stated that Audi Alterum Partum" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as 2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67.

- M. That the appellant have not been treated in accordance with law hence the appellant right secured and guaranteed under the law are badly violated.
- N. That the charges leveled against the appellant were never proved in the enquiry, the enquiry officer gave his findings on surmises and conjectures.
- O. That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

Appellant
Shareef Ullah

Through:

(SYED NOMÁN ALI BUKHARI)

(UZMA SYED)
ADVOCATES, High Court

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO.____/2021

Shareef Ullah

V/S

Edu Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier 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

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO.	/2021
ALLEAD NO.	12021

Shareef Ullah

V/S

Edu Deptt:

<u>AFFIDAVIT</u>

I, Shareef Ullah, (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

Shareef Ullah

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. ____/2022

Shareef Ullah

V/S

Edu Deptt:

AFFIDAVIT

I, Shareef Ullah, (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

Shareef Ullah



Office of the District Education Officer Male Lakki Marwat

PH No. 0969-709234, Fax 0969-538291





APPOINTMENT ORDER.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the post of Junior Clerk (deceased Son quota) in BPS-11 Rs. (10510-740-32710) the usual allowances as admissible under the rules on regular basis under the existing policy/notification issued vide..SO (R-IV)/E&AD/1-3/2015 dated. 19-04-2016 of the Provincial Government in teaching cadre on the terms and conditions given below with immediate effect:-

S.No	Name	Father's Name	School to be Posted	Remarks
1.	Latif-Ur-Rehman	Mazullah Khan	GHS Adamzai	A Y P . $A.V.P$
		Kabal Khan	GHSS Kot Kashmir	
3.	Muhammad Sharif Ullah Khan	Saeed kh ap	GHS Muhammad Amir Wali	A.V.P

TERMS AND CONDITION.

- No TA/DA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- They should not be handed over charge, if he exceeds 30-years or below 18 years of age.
- Appointment is subject to the condition that the certificate/documents must be verified 3. from the concerned authorities by this office, anyone found producing bogus/ fake/forged/tempered certificates will be reported to the law enforcing agencies for further action.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the 5.
- Pay will not be drawn by the DDO concerned until and unless a certificate is not issued by this office that their certificates are dully verified.
- They should join their posts within 15 days of the issuance of this notification. In case of failure to join their posts within 15 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be
- Health and age certificate should be produced from the Medical Superintendant concerned before taking over charge.

Page 1 of 2

MEAD MASTER G.H.S. M. A. vir Wall Bisti: Lunni marvial

be juill be governed by such rules and regulations as may be issued from time to time by the Govt. Their services shall be terminated at any time, in case of their performance is found unsatisfactory during their contract period. In case of misconduct, he shall be preceded under the rules farmed from time to time. Before handing over charge once again their original documents be checked by the -concerned DDO, if they have not the requisite qualifications or they are overage, they may not be handed over charge. The undersigned reserve the rights of amendment in this appointment order in case of 12. any mistake/error or omission. The order of those candidates who are serving under the competent authority (DEO Male Lakki) will take effect after submission of their resignation from such service. 13. District Education Officer (Male) LakkiMarwat Endst:No: 3/48-56/Apptt:J.Clerk/Deceased /2017 Dated. 20

- Copy forwarded for information to the:-Director Elementary & Secondary Education Khyber Pakhtumkhwa
 - Peshawar. Principal GHSS Kot Kashmir.
 - District Accounts Officer, Lakki Marwat. 2. 3.
 - District Monitoring Officer Lakki Marwat.
 - Headmaster GHS Concerned
 - PA to DEO (Male) Local Office. 6.
 - AP DEMIS Local Office.
 - Candidates concerned.
 - Master File.

Deputy District Education Officer (Male) LaldaWarwat

HEAD MASTER S.H.S. M Amir Wall Dist: Lakki Marwat Page 2 of 2



1	·	
GS & PL) NWFP -27 FS 2000 P of 100297-98	٠,	24
. 1	١	ſ

MEDICAL FITNESS CERTIFICATE.

Some of Official Muhay	mmad Sharifullah Kham.
Religion Is lam	
Father/Husband Name	ed Jeham
Rusidence Nan Salhi	D and Medad Wheel
Teh; S/Naux	mg Dist Latelle Mondal
Dated of Birth 19-04-19	9.9. (NIC No. // 20.2-036.36.8) - 4)
Exact Height by measurement.	5-7
Personal Mark of Identification	chaste
Signature of Official	Whish of the care
Signature of Head of Office	While Took over Charle Jogott (AN)
	Seal of Office
	11 m m
	· · · · · · · · · · · · · · · · · · ·
i do hereby certify I have exa	nined. M.M.M. M. Mald. No. 8) for Mala G. H.S. Lawin Morris
that held	he had any diseases communicable or other constitutional effection
or bodily infirmity except	NY/L
 ! do not consider this as disq	ualification for employment in the office of the
O.F.O. (Mal)	e) Latelli Marn Vat His/Her
age according to his own Sta	dementyears and by appearance
!	Eighteen years.
V	
	himsel
LEFT/RIGHT HAND TH	BRICK CONTRACTOR TO THE PROPERTY OF THE CONTROL OF
IMPRESSIONS	DHQ Hospital Lakki Marwat.
	DHO Hospital Lakki Marwat

Section in the second in the s	manuficachi 17 Online C	ash Deposit	D (L) a (s) s	(Oreque D	D D M M 1	7 Y Y	Ϋ́'''		1
-27		· · ·	(Please Speofy)					tomer	Cop
president No.	71년 1세하7	यदश्चीत	5 4 5 16	Rembéh Branch Co	ode & Name .		57.7	<u> </u>	
o assert Title /Ca	ira Duldar Hania 1999.	ta mas fra	<u> </u>	Credit Card No.		11111			T
Romki Samel	Branch Name	Cheque/Inst No	Amount	Danominations	Amount	7			-,
				5000 X .	•	<u> </u>		•	
				1000 X	1		JED BARR	_LINETI	£Đ
	• .			500 X	· · · · · · · · · · · · · · · · · · ·	- Er	0008: 03 1:11:11:12	70 70 Mai	
			•	100 X			99 (017	2011 17 79:57:7	77 -
				50 X	*		90100445		
	,		· · ·	20 X					
				10 X			isan er det	17	
-				Coins		130	71777	V.	
	,			HPB .		1 10	10 (TSHA	0.248(3	
	· · · · · · · · · · · · · · · · · · ·	·	·	Total Amount	1-001.		a ileish	AQ.2481	3
nemit in Field	200	11.00	and.	a. Bur.	. 1.	_	FBP Va	lidation	ī:
				len in case of onlin	e Teansactions				
positor's Name	e c /.	- '1	CNIC/NK	OP/PF (Lepy attached)	1-11				
l/Mobile No.	. /		Bank Cha	uges: - liz	1:31/~	7 .			
	05	59494	Cal		1///	7		•	
			/\ SP 1						

HEAD WASTER

OLS MANIMONION

OLS LAWN MOTHER

OLS LAWN MOTHER

OSS

Mobile No:03469513955 Abdul Hanan Assistant Secretary

IMEDIATE AND SECONDARY EDUCATION, BANNU. Dated: <u>26-04-2017</u>



From

The Secretary, BISE, Bannu."

District Education Officer (Male) lakki

Subject:

VERIFICATION

i am directed to refer to your letter No. 2210

dated 24-04-2017

on the subject noted above and to inform you that photocopy (s) of Certificate (s) of the following person (s) enclosed with the above mentioned letter have thoroughly checked and found as detail given below:

S.NC. ROLL NO. INAME OF CARDIDAYS	FATHER'S NAME KABAL KHAN Saeed Khan	02-01-1988 19-04-1999	SSC(A)2004 SSC(A)2015	Correct Correct
2 46114 Mchammad Sharif Ullah Khan	<u> </u>		<i>y</i> .	10.3

(ASSISTANT SECRETARY) BISE, Bannu ∜ Miobile No:03469513955 Abdul Hanan Assistant Secretary

BU: S.No. 011439 Moard of Intermediate and Secondary Education, Bannu Khuber Hakhtunkhua, Fakistan Roll No. 46114 0041-BZMKL-1-13 Registration No: Secondary School Certificate Examination Checked & Verified ORIGINAL CERTIFICATE (2015 ANNUAD) Name Mohammad Sharif Ullah Khan Suulcas of Govt. Shaheed Bahram Ahmed Khan Higher Secondary School Serai Naurang, Lakki Marwat Secondary School Certificate Examination har passed the hold in Month 2015 as a Regular candidate. Roobtained 621 marks out of and has been placed in Grado 6 1 Representing 1.Engish 3.lstamyat Computerry 7.Chemistry Date of birth in figures: (19-04-1999). Date of birth in words: 19 April, Nineteen Hinety-Nine: 18-06-2015 Drepared one Result date: ASSTT: SECRETARY

30 M 2501



OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) LAKKI MARWAT



Phone No: 0969-709234, Fax No: 0969-538291

OFFICE ORDER:-

Certified that, all the documents relates to the merit list in respect of the below Junior Clerks, appointed Out of Deceased Son Employee vide this office No. 2148-56/Apptt: Tr Clerk/Deceased/2017 Dated 20-04-2017, have been checked / verified from the concerned Board.

been (checked / verified from the constr-	School
S.No	Name/ Father Name	GHSS Kot Kashmir
	Abdul Matin S/o Kabal Khan	Amir Wali
1.	Muhammad Sharif Ullah Khan S/o Saeed Khan	GHS Munammad Time
2.	Muhammad Shara	

Hence, their pay may please be released accordingly.

Dealing Assistant

Superintendant (Estb :)

Pay Released

District Education Officer (Male) Lakki Marwat

Endst No. 3255-57 Dated 28/04/2017

Copy to the -

District Accounts Officer, Lakki Marwat.

Principal/Head Masters concerned. 1.

PA to DEO (Male) Local Office. Ž.,

> District Edication Officer (Male) Lakki Mar

يَكُ مِنْ الله خَالَ عُرْسَرِيفِ الله خَالَ عُرْسَى الخارج بريد البله -2148-56. 20/04/2017 Eller licery person sind . . . 6-8148. . بـ 20/04/2017 . أيوازيتر . . (M) DEO (M) . أيوازيتر . . أيوازيتر . . مَدِينَ مُواجع .. جو بمر كرك كل كا . . . خالى وسط كاجارة سيال لا ه ـ مقام في اتبح البي العيروالكم 29-04-2017 . 20

(1) DEO(NI) Lakki Marwat

(2) Distt Account office Lakki Marwat

·		+					, , ,						٠ , ،		:	· (ъ ·		mij.	:	. !
B	los s	λ	م کلنے ر	والئ	1	1	3	الول		-38	لرزا	الر لما	(C)		126/L	S/F					
		9	17					1	. إير		برنتاد	·l	(a)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	~ (6	30	T)	-			
		1 -										•		(7)	<u> </u> -		روشر	2 (1)	-	- sale	
إبر	مايي	١												\mathcal{L}		ربيب	برس	کېده			
	1	-#-		, <u>;</u>		:	8	-	<u> </u>		<u> </u>		٠.	ريون ا	روانگی		7 7		_		-
ز در • •	آد	\prod	روانگی	وستخط	آمد	وتتخط	روانگی ·	وستخط	آند	وشخط	روانگی	وستخط	آمد	وستخط	روای	نط ا	آبر رسخ ا				
	\leq						ļ			-	· · · · · ·	<u> </u>	-		-			1	-		;
مام	-	1	·				<u> </u>	ļ	<u> </u>			 	4					2			
علم (و	l			3 1			<u> </u>		-		<u> </u>	/_	-	-	DE	the le	24		— <u>1</u>		
de	-			:	<u> </u>			<u> </u>	_		<u> </u>	<u>/</u>		<u> </u>	_			4	1 .		
كالمو أ				·							/	<u></u>	-\		_		<u> </u>	_ 5			
1/20	_				<u>.</u>	<u> </u>			<u>.</u> .		/		_	_	_			6		,	
7	1			,			• •					<u>.</u>				_		_ 7	7		
کارا		1																_ 8	3 1		
1,1	-													15	W	1	DA,	<u>ک ا</u>			1
عکیم او										1		خ ا	, ,		1	70-	-11-2	<u> ا حرم</u>	0		:
115	•		-	-						7	U	العراكما	سريد	11.			ļ		11_		1
مارا			-		 	-	_		1/	4	فعر	2 :70	زر م	7.	00	(P)	T. P.	107 .]	12		1
Jirth		+			-	-	_		-/-	1.3/	سما نت ال يوراء. المراتب	2				6			13		
	-		_	-			_	_	/ 	_	10	1/2	3	(6)	7	T P	79		14		Ì,
7 1		1			-	_	_	-	/			4	 -,	- -					15		l l
معلور ملرور	-	11		1 7 9				/-						4-5	_		<u>~</u>	 ``	16		
			_		_	_		_ /_			_			/	2/1/	+4	DA.				
	<u></u>							_/	_ _			40	- P	_}_	_	95 G	0 1	T	17		,
دار در سے	_							/	_ _			1 50			- 3		ורים: זכים	۷	18	* * * * *	
12							/	_ _		. ::		7		3	二个				19		
ولار إ	. –			•	_		$\perp \mid \angle$				_			_ <i>i</i> ;	المنظر	عد			20	:	ļ.
	<i>)</i>						/		_	w.ş:			_	_			29/10	}	21		!
105	, -	1									- 1		_		_=_ _	<u>A</u>			22	1	
كفلم		1												_ `	Żμ	M	DA	2	23		-
افلی اکاریا اکاریا	<u></u>	2												.		Ab			24		
ولم (سے					: /											· ·	an	10-	25		
<u>、</u>		1/2													ارزير		ارس	_	26		
<u>م</u> لا آ	- 189 - 1 - 1 - 1 - 1			- 1 J	/- -						1 1				اردين	٠	رزنی	-	27		
	1	+			K					12				,	1/2		ر تر رهن	-	28		
3		┢┷	 		+	· .			<u></u> -			- 7				· cent	10	we.	. 29		
	<u>:</u> ;	1	+			-				<u> </u>					5	ノハ			30		
	- 		 / 		-								·			<u>, , , , , , , , , , , , , , , , , , , </u>	<u> </u>		31	100	,: .
ساد	1	†	1			<u>-</u> حال	<u>اء</u> ميزان		سابة	ن ا	ميزان		سابقه	ا حال	اــــــــــــــــــــــــــــــــــــ	:	سابقه	مال	قتم رفعست		٠,
اساد	لل		-	بقه ا		ا حال	.برن				<u> </u>					3	 	03	اتفاقيه		,
		 			+					-								-	استحقاتيه		
	!	٦		- 1 <u> </u>							<u>.</u>							-	بیاری		
i :	-1	ی		i ii			·		-		· · · · · · · · · · · · · · · · · · ·		. ,			• 3		63		1	
651-451	2707 64 4	ن إ	1															ن علتار ن علتار		٠. ا	
لياق	زناط	٠. ا	<u></u>			دکیس مدوسه.										١	(9	ت ميسير	<i>≆</i> 		

المذهبي گور كمندف ما تي سلول بابت ماه هي رواتلي روانگی روائكي وتخط وتتخط . آند وتتخط وستخط 3 5 6 11 12 13 14 15 16 17 18 19 والأوام 20 21 - 1 land CHP? 22 23 24 25 26 27 28 29 30 31 حال حال ميزان بسالقه حال سالقته حال ميزان سالقه <u>ٔ</u> حال اتفاقيه 03. سخقاتيه بياري ميزان ٠3

.

عهده ردانگی روانگی تاریخ تاریخ روائلی وتتخط وستخط ر. آند وستخط وشخط وستخط وستخط وسخط . آمار بر آباد 1 2 1 3 4 5 W. 6 8. 9 10 11 12 13 .14 15 16 7/3 17 1.8 19 20 21 22 23 24 25 26 1 27 28 29 1/35 1/35 30 31 سابف حال ميزال حال سابقه سابقه حال ميزان سألقه اتفاتيه 03 التحقاقيه بيارى ميزان

*حرح*ا هالتناف

غبرده رواكي رواتكى وستخط آلد وتتخط رواتكي ونتخط آند وسنخط وستخط . تاریخ 1 2 71/74 . . 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 47 30 31 حال سالقه ميزان ميزان سانقه خال سالقد حال . م دخصنت ميزان سابقه حال اتفاقيه انتحقاقيه بياري t.o ميزان 29409 1017

Cost Oberes HS Sill BA يمبده تاريخ روانگی روانگی أمد دستخط وستخط وستخط 1 2 2/30 3 4 5 6 7 8 9 $g/_{\Delta}$ 10 42 11 8/15 2/20 8/15 12 • 8715 13 ų. . 14 15 8/15 16 871 17 87/ 18 19 20 12/8 21 8115 22: R/15 23 8//5 24 25 871 26 27 28 29 811 30 871 31 حال ساابقه حال ميزان، برااقيه حال ميزان سابقنه حال انفاقيه -4 01 شقاتيه بياري ميزان ju 03

حبده روائگی ردانگی . نارخ وستخط ونتخط وتنخط ر آبد 8/15 2/7, 1 2/2 8/1 2 12/20 815 3 7/20 8715 4 14 5 - ;} 6 7 2/20 2/20 8 81/5 9 . 12/-8/18 10 8/15 4/20 11 12 2/20 8/18 13 8/15 14 <u> 57</u> ç 15 16 17 8/1 18 44 19 20 871,1 21 22 ديه 23 720 12/-8/13 24 81) 42 25 26 8/15 27 1/20 8/15 28 8/13 420 29 8/15 . [2/20 30 31 حال م زصب حال سابقه اسالقه ميزان سابقه حال ميزاك سابقه خال ميزان خال àlj اتفاقيه سخقاتيه Ţ بياري ١,; ميزان 04 D

					٠		٠.				,										
			A STATE				(2)						٠.						:		
							over Server							3111 5 4	. IIII			niib — — mack			
		·	<u> </u>		<u>} </u>	·	·		• •		tý si Leste		Oneff		. ()			•			
	,	<u>C</u> ,	7 H	<u>S</u> -	W.	/-) n	מא מ יייי	vah		ak/	ــــــــــــــــــــــــــــــــــــــ	- (Q	i	HUS			30		11.		
3						•		<u>-/</u>	0	بنءا	<u>į</u>			0.		· · ·	-				
7.43		 !											<i>بان</i> پ	العبر كاكرا	رد روز جونوک		نام عهده				
27.	رواگج	يتخط	5 /			روائگی	ولتتخط	آند	وتتخط	زوانگی	وستخط	آمَد	وتتخط	روانگی		آغد	تاريخ				
	:	<u> </u>	-		1 1							<u>/</u>	1) <u>Joe</u> ll 1-2				1				
1	- [,	-:.				*								2/20 S=	1	3/15	3	• • •			
-					.:					; ;			رعرف	2/20		8/15	4		i.		
	i a									<u>" </u>			رء يو	2/20	ارے بنے ایک ج	9/s	5				
									1		27 5 5 5 7	L	رزيو	2/20	رسرت اسرف	3/5	<u>6</u> 7	' '		1 1	
-	!	-						-/-	<u>.</u>				رزر رزره	12/_		8//5	- 8			1	
-	.	-						/				<u> </u>) 	1/20 [ارتربو: ک	8/15	9 10				
											o o o o o o o o o o o o o o o o o o o		رتررية	2/20	ررس	3/15	- 11				, in the second
-ئىي		-	<u>, </u>				<u>/ · </u>		· ·				ائتر ہو در	120		3/17	12	Ì,			
	; :	<u> </u>				/.							ربريل رزيق	2/20	کبربر رئرنی	8/15	13		:		
					4								ورز	12/20	الرند	871)	- 15 .		i I	1	
1 (/					1.2	:	En C	lu	Tto	17	7-16-				7.1
	-	-	_		/	,		-					المربع التربغ)	2/2	الران ا	8/1	17 18				
\					<u>/ </u>	,							5	5	5	5	19				
ー ク	<u></u>	_		-/				 			<u> </u>		رورن انه رن	2/20		87/5		-			
													ار پی	2/20 M-		8/15					
		- -	4				-	-	ļ					17		لركوا	23				
1.		1	/					-			15-12	1.1	4/		7 /		24	1			
4		\mathcal{I}			į.		-			1	سر إ	71					26	1			
ー 9 ツ	1/	-	-		rigi	-		31	Town) —		1					27	_			
	4	_ _	<u>`</u>				-		_	<u> </u>		1		_			_ _ 2×				
14														-		- '					
	·	-	%() -	مال	1 : 1.1	ا مردا		. 11	ļ		201.4	11.									
مال		-	سايق	الا	<u>ن</u>	<i>[</i> ••	مابت.	حال '		میزال	سابق	مال .		<u>少</u>			÷				
	a de la composition della comp										3	. !		<u> </u>	<u> </u>			4			
	1 10	_ -	 -	,,	<u> </u>	<u>.</u> :	_						-	50							
		12	0 4	(2/40	<u>1</u> 旬末		· .	1.	1 .			<u>4 : </u>		<u> </u>		À,	'				
			Total S			製物		- S. S. S.						and the second second		A Section	A				

in a state of the

1

	•				•						٠.	
B	م در ک	(//2	ز ور	£1.32	11	3,	<i>h</i>		3 0×20		. 🔿	· .
	1		2 7.7.	"/ 	1 str	11.6	Più	<u></u>	- 062			2
				, ic	<u> </u>		ت ماه	با:	<u></u>			
	4 /		************			••••		*********		ب رسر	فر منهدي	71
روانگي آي	وشخط	وتخط آم	ا روانگی	رستخد	آمد	وستخط	رواگی	وتتخط	وشخط أآمد	1.5	<u>/</u>	عبده
<u>-</u>								נכם	وتشخط آمر	روانگی د چرک	ألمه ألم المتعلق	تاريخ
						<u> </u>				2/2	1/8/1 _C	2
- I						 ,		\leftarrow	1.7.1	200 4	1/8/15	3
139	+									2 20	17 9/5	4
-				_					ا کراز	120 0	2 8m	5
						/-			- S.C.	no	4	7
OFFICE OF THE PERSON OF THE PE	-				7					(2) (1)	13/10	8
-		-			4	· ·			1 5 7 4	ن در/ ن درا	28/15	9 10
		1 4 .		_/_			· ·			ن مرا	7 3 000	11
				/	-					100		12.
o end in a produce	and man a likewise		· /						1	20	1924	13
			$\overline{/}$						الدنترين	رنی مح	28/1	14 15
		1	/-		-	_			ہد استربعہا۔	20 00	8/15	16
	· : .	/							ريم الزين ريم الدين	رىن 10 <u>0</u> رئي 00	77,7	17
		 -/ -				_	4		(عارون	- 42	7 - 7 -	18 · · · · · · · · · · · · · · · · · · ·
		1/1		-		-		_	رد رزن	رابغ الموا		20
		/		_		+			- Jun1) AV	, , , , , , , , , , , , , , , , , , ,	21
									2/2	-12/		3
	/							1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	en	dut		4
						-		_ -	2/2	ر درند 2	2/15 2	
	4	1							را ارتعا دا 2 ارتفا	ترکق استا	1 1/1- 2	
1			-				1.		2/2	<u>زری ه</u>	18/15 2	i
				-		-			1/2/ 2/20	رترمیس و	8//0 3/	
$-\Gamma$				-		-			1/1 U/V			 ∤·
	حال ساب	میزان	سابقه	حال	ن	ميزا	مابقيه	حال ا		سابقه	31 ک <i>ا گرفتا</i> زصت حال	
	- 7		-				-		7	_	نفاتيه –	
1/		18			· ·					~	مخقاتيه –	7
11	31				· .	• •		11.5		-	بماری "	
t Miles Vales	ي سيد									<u></u>	يزان فرف ها	
化制度		A TORING STORES	機性でき	من درجم ۲۰۰۰ ایمان ۲								• •

(22)

Collect Diville Chilled Dicher	G Par	
WI STATE OF THE ST	(1)//~ (1)/2	める
ابت ماه و روم ع		
	مدّا روز ر	را
	7/C	عبريده
روانگی و تنخط آمد و تنخط روانگی و تنخط آمد و تنخط روانگی و تنظم المد و تنخط روانگی الم	آمد وستخط	
2/5/2/2/5	1 - 1	
on de	estytel	2779
2/ 0/2/ 2/2	8/18	3
SunDa	guy.	4
	(J. 1 = 1)	5
2/2	ر 1/8/	
2/2-/2-	1/3/8/1	7
10100 place		
3/21/12/ ₂ .	-	1 .
2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		-
		11
- 1 1 2/2 1/2 2/2	8/1	12
	10/3/8/1	
2/2	8/15	14
12/12/	بر/8 متربي	
2/2	8/18	17
San Jan	1274	18
3/2	2 2 17	19
2/2	1/3 July 1	20
2/20		21
12/2 12/2	W/ 8/1	1
17 / 1 1 1 1 1 1 2/1	رام التربعية رام الرائي ال	
Sun D	13/ OK	25
2/20	12/2/2018 18 12/6	<u>-</u>
1-/ Sp2 3/20		
3/2/2/20	3/ 3/1	28
		29
		$\frac{29}{30}$
		31
ميزان حال سابقه ميزان حال سابقه ميزان حال سابقه إل	عال حالقه	
	00	اتفاتيه
		التحقاقيه
43 4		یماری
13-411121 VS - 78 90-00		ميزان

NAME OF THE PROPERTY OF THE PR

(23)

1.00		٠.			.* •	•				.i.		ور نسر	٠, ,	,	•	مسد
	. :),			,			70 m	0~	<u>میں</u> م	<u> </u>	2	<u> 115</u>	-
	:	Lu	1 (5°7)	الميرو()	<u> </u>	4	1H,	<u>} </u>				PLASI	BA			, [
					"	Æ.	7 11X	ت ماه	ا ایہ	,			#) !		رمص	
			7	1				- 0 0	• • ,.	11 ¹¹	· ·	207	8/_	ستحدير	·	
		••••••			••••••••••••	*******						الاي	ب را	تنزير و	ام	
روانج	وستخط	آد	وستخط	روانگی	دستخط	آد	1000	E	T			<u>- C</u>	÷	· · · · · · · · · · · · · · · · · · ·	عبده	
		1 -		. 0197	وحط	1.61	رستخط	روائگی	وشخط	آمد	وشخط	روانگی	 		تاريخ	
		-	1	;	 	-	<u> </u>	ļ				//25	ررن	1/3	-	
							 		-/		27	10		4	. 2	-
<u>.</u>								/			27/	130	مرزین از که	7/30		┨
		,						/		 	1	1/25	1	1/3=		-
		<u> </u>		, 1 i							נינט	1/01	7/2	d	1	1
	· .	<u> </u>				·	17				2/	111	100	7/30	7~~~	┨.
<u>.</u>			<u> </u>				7		1		12)	1/25	2 3	7/20	- 7 8	1
<u>. </u>	<u> </u>					17	· ·					771	X	7/30	9	┨
				:		/					مرشرين	1/35	رتربو	713	 	1
·		-						-			ارتريق	1/25	نربق			
		:					٠		V.		والمراء	<u>در</u> کےام ک	2 3	736	12	
entropic:	Half Straight La	1 Philosophysia	THE STANSON	i Militarian kiring silan ya		potro-in-triba				. † s	احزن	1/0	مريد	7/30	$\frac{12}{13}$	
		<u> </u>	<u> </u>	_/_			·				4	1//_	ارغ	7/30	14	
						1					الرية	1135	The second	7/20	15	
	<u></u>	· ·	 ,	/			· ·		· ·	100	Sea		6~	1	16	
			/				ļ		· .	·	الرن	1/25	シク	73	17	
_			-/-						<u> </u>			1/31	اردن	7/2	18	, ·
			 / - -					·		·	Su	n	سعر		7 19	1
_			/ -	i.	<u> </u>	<u> </u>				-	- N	117	<u> </u>	<u>-] </u>	20	
	<u> </u>	-/			· <u>-</u> -							2/6/	11		21	
	·	-/-		1.		<u>.</u>									_ 22	
		/		<u>:</u>	•			· ··· :			Sea	-	*		23	
	-/									,	اربو	<i>1/3,</i> -	مزرف	7/30	24	
	-/-						` `				CU	de,	afren		25	
	/			1			-	•	·		4/	//<	ارزین	7/3	26	
7	, ,									· - (-	ارس	/3c 4	7	7/3	27	
				·					-; .		ارس	1/35		2/3.	28	
	:										*	/?(- 12 m	7/20	29	:
				: .	· ·	,	. /		-+	4	Su			$Z \coprod$	30	· :
,	سابقه	حال	يزان	;	سابقه	حال	ا اِن :	ا مير	سابقه	حال	<u>ا </u>		***	1,	31	;
,.			1, 1		``.			+				-	سابقه	حال	تشم خصت اتناق	
·	-				· ·										الفاتيه	. !
		1					·. ·				- :		. , , 		التحقاتيه	
		*	———							· · · · · · · · · · · · · · · · · · ·	, , i	<u> </u>			بيارى	ı
梵		2/2 2/2/2	17/41	8-1	· ·					·		· ·	061-41	12702 🖜	ميزان	
Table 5	abahan di mar	to listen order	Arriboreum sed					٠.,				•	ناب	ر فرقاما		

20					(87)						P		enn.	I. 111145						
		**			11	•		- 9	Lidelle	A constant			***************************************			· · · · · · · · · · · · · · · · · · ·	and security	3		
2			<u> </u>	2.	[51] 18:	9/	<u>رم</u> ر	12	4	1.4	I (O	ju)(SI)) 			
25									ت اه	<u>~!</u>		1	*	ريني ور	رثرد	ſŧ	_	:	12	
41	روائگی	ر شخط	آند ا	وشخط	روانگی ا	ر تخط	آباد	وشخط	روانگی	وتتخط	آمَد ا	د شخط	ر آر روانگی میرو	م ا دسخط رسونع		عهده تاریخ	I			
1 1			<i>r</i>									الربن	1/20 1/20	3	81/1 8/1 8/1/	$\frac{1}{2}$				
		-		-								ر رزنی رزنی	1/20 121-	ر نوا	8/1/		1,			
1												-O	n cc	ty	1007	7				
-						· · · ·	7					15 12) 15 15 15, 15	2/20 2/20 2/20	رزند) روزن رسرن	8/11	. 9				
												الربيد	2/2	رورو متربع	915 81,5	10 11 12	1			
						1							2/2.		115	13				
The Calculate Day of the service of					1							رس شریعا شریعا	2/20 4m	ر برد رزید	8/15 8/15	15 16			And the second s	
1					7							سرد شروع رزون	**************************************	رين رين	8/15					
THE PERSON NAMED IN THE PE					.		· ·		:				2/24	شرفعة	3/1	20 21				
												رزی رزین رزین	2/2+) 10/4 11.14	ئر <i>ور</i> ترون درور	¥15 -¥15 ¥19	22 23 24		1		
MIRAL FASOR												ترب ترب	2/20	نون ترین	811 1/15	25 26				
		/					·					رد د	2120	شرور	8 ₁₀	27 28			11,111	Z
												م رود	2/20 2/23 /Lu	مرزین مرزین مرزین	8115 8/15	29 30 31				
يخ حال		سابقه	مال	יילוט	?	سابقه	مال	يزان		سابقه	حال	يزان .		سابقه	مال	نتم رفضت اتفاقیه		2007	A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	1			4	18											ا ^{تق} فاقیه بهاری	-7			
	文本		:	1116				•	,— <u> </u>			<u> </u>		(S)	ر زومان	ملزان				

.

	等。計算			神香		Nan F		i filozopacin		SHIP OF SHIP	i ig or before was	Nativisti		والده بالمائيات	en e	: 313	Normanian.	E. Crimina de la compansa de la comp	_
· 15.	٠.	, ·	Ş	1.				·			siqif			ه در			(Shirth	100 mm	=
	. : '			- '			٠	•									•		
Te (SEA)	<u>.</u> :_:			. :					•										
O.			·		/				_	- oli	<u>.</u>			·		•			
	·		<u> </u>	1	<u>b</u>	3/1	7/	19	_,	27	0	الألا			2	09	200	n ~	
8	i				. :		<u>, </u>	~ /	~	<u></u>	<u> </u>	<u>ر 7</u>	.		22b(I
		· ·			<u>/_Y</u>	رز مع	<u></u>	· 		_ اه_	ابرت		٠.			<i></i>		. 00	_
									 			-			· 	<u></u>		<u></u>	
24.7.7.4%			******	}i					·· ·····	•	•	·····	******		<u>/\/</u>	كي ال	سين	نام	_
لی آ	نظ رواً	=	آند	شخط	عًلیٰ وَ	·] .			 		'	<u> </u>]/c			عہدہ	
			101	. خط	<u>ی و</u>	190 1	وشخ	آد	تنخط	انگی د	ل رو	وستخ	آند_	وستخط	روانگی	وتتخط	آلد	ناریخ	_
	- -							<u> </u>	<u> </u>				/	هرين .			 -		_
			_		_				Ŀ							20	8/1		_
- 4	<u> </u>				<u> </u>							7		(d) P	2/2	1000	8/15	2	_
		_ _		.,, "1											2/20	رين ج	57/5	3	_
-						_ _			7		/		——	1/10		210	-	4	_
• !	<u> </u>									/	_ -			ئىردنى		7	37.0	5	-
-						_			<u> </u>	7	-	-	-	1 0	177	hut	17_	6	į
3 5					-	- -	-		-	 -			·	الشريك	2.121		575	7	
4	1		\dashv			- 	-		/-		_			4ºC	2/20	ر رق	8715	8	,
			+		 -			/	 					2 ريخ	12/-	يرني	824	9	1
	- [\dashv		 			+	· .			-:-	,	الأرب	2/20		87,5	10	1
			-	!	 		/							C	111/	100	W		ł
1			_	· ·	<u> · </u>		Λ			:			į.	12	2 <u>77</u>	97	7	11.	l
* 			_				/ []	,		2 1	الدرنيا	420		3/10	12	l
				1		1.7				 	+-			12/2	2/20	روپي روپي	2/15	13	ĺ
- {				,	-	1/-	- -	_		-	+	-	· ·			3/2	Y115	14	
- September						/	+		·	 -	-				2/20	ارزين	8/1	15	l
ž		_	+		 	<u></u>				 			<u>'</u>	مشرونيه،	2/120	الركريز	8/15	16.	
1	_	- 	-		/	-		_		 	$oldsymbol{\perp}$		· .	34	24	10 J	8/1	17	l
~ 	+	+-	╁	·	/	<u> </u>				<u> </u>				Sen		•		18	ĺ
-	 	+-	+	/-	<u> </u>	- -			·—	<u> </u>				الران	1/20	الرس	31,	19	
- Park		+-	+	/-	:		4				<u>.</u>		, ;	ارگرت	1/20		87,5	20	
-t-	- 	 -	- /			<u> </u>								- /		<u> </u>	ار اوراه		
Articularity and		<u> </u>	1		:		.						.	را را	1/2/14 11			21	
-gurt tear		1./		_	i.							1		1 1	2/3.	7/	8/15	22	
m+z-u	<u>. </u>			•	, :	Ţ.	\top	_			 	-		- 1	12/_	ا رون	915	23	
	1	7.			11,	+	+-	_	<u> </u>		┼	-		الرن	1/20.	أكرين	87/1	24	
CONTRACTOR OF THE PERSON OF TH	1		+			-	+				<u> -</u>			-Ja		-	=7	25	
N. S.	1/-	+	+		·	-					<u> </u>			كرنيري	1/20.	والزرز	7/15	26	
	/	-				 	<u> </u> -		·			.] -		1. 2	.		8/1,	27	
<u>.</u>	-	 	_		',	<u> </u>								4	100			28	
	ļ, ·	 	<u> </u>			<u></u>						7		٠, ١,	,		*****	29	
4 500 6	ļ	<u> </u>	<u> </u>								·	-			2/20				
1			1.					•		 -		+	\dashv		0	*		30	
1	سالفه	حال		بيزان),	سابقه	U	6	بزان	٠	سالقه	+-	ا حال	م دالور				31	
Commo					1 .		1				الماجد ا	+		ميزان		اسابقه	ت حال	قشم رخصه	
							+	+		<u> </u>		+	- -					اتفاقه	
· value	. :	-	1			<u> </u>	+-	-	<u> </u>			-		<u></u>		-	ق. ا	اتحقا	
华	1	. ,/	-				<u> </u>				<u>.</u>							بيارة	
ž.	3	$4\tilde{\gamma}$	1.		~	·	<u> </u>					-	T					أبراا	
XX	i	±×c(JM.	J. 1	8						·	•		· · · · · · · · · · · · · · · · · · ·	<u></u>	05 L			
超越		di di di	(m) (M) (M)	river sent i	Barry Walter	Site Company 15										علينان	7		

The party of the p

And the second s

Juni wali Lakki marust July Belogg ىر آباد روانگی روانگی عباره روانگی آلمد وسنخط وستخط تاريخ 1 2 3 4 5 6 81, 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 71-8/15 8/15 22 23 10 8/5 24 8/1 25 26 27 8/4 28 873 29 88 30 بإحال 810 31 سالقه حال مبزان سالفه مال مبزان سارنته حأل ميزان -نم فوسند حال اتفاقيه 5 ; التحقاتيه Ţ بيارى

311

المرافي المرافي المرافي المرافي المرافي المرافي المرور المرور المرافي المرافي المرور المرافي المرافي المرافي المرافي المرافي المرافي المرافي المرافي المرور المرافي المرور المرافي المرور المرافي المرور المرافي المرور المرور المرافي المرور المرافي المرافي المرور المرافي المرور المرافي المرور المرور المرافي المرور المرافي المرافي المرور المرافي المرور المرور المرافي المرور المرافي المرور المرافي المرور المرافي المرور المرور المرور المرافي المرور المرور المرافي المرور روانگی وستخط روانگی وتخط 1. 2 3 4 5 6 7 8 9. 10 11 12 ١, 13 14 15 16 **17** 18 19 20 21 15/01) 22 23 24 25 3/ 26 27 28 29 30-31 سالبته . حال ميزان حال سالقه ميزان سالقه حال : ميزان سالف اتفاتيه التجقاتيه بياري **学校の**

(09)

k T	e nationals	ac reco				mangan	e vizidir					¥;14 (1* 0.5 m)	CEE STATE		امران و استنداده و است المران المران و استنداده و استنداد	e de la companya della companya della companya de la companya della companya dell		is in	1115				
						•	,			•		•						-		-			
N	C Z		Ð	1	3.4	18	m				•	:,		:	•								1
			~Q	رفي	<u>-1"</u>	<u> </u>	<u> </u>	4111	iv u	ral		<u> </u>	GAZ (<i>خا</i> ه	non	<u>സരി</u>	<u> </u>		216	NG)	2		≥ ∫
	بربتد	سماره						بمبر	الثو					oli	ابت		٠.	<u>.</u>	المت		٥		
.,	n	: 	ս		••••••	*********	•••••			********		•	•••••							ر درنگ			ران ا
رو	وشخط	آلد	Ü	عی ا	رواً	وستخط	آبد	وتتخط	روانگی	وستخط		آ،	وتشخط	انگی	: <u>.</u>		ا		<u>. T</u> .	_C ~	ربردد	•••••	عهد
<u> </u>	کلوالر مکار الہ] ·- 			-	<i>.</i>								101	2 <i>)</i> .	وتشخط	آند	زشخط د	وانگی				ا الرد
	e'/		\vdash	-													/-	سريد. سرند،	2/2		, <u></u> 2	. 1	1. 2.
	ي الم	-						-		<u> </u>	+-					/		تريز	2/2	روز ان			3
<u> </u>	יינה אמן דאת אאת באת אאת	-	-	-					· · ·	•					-/			رورني دوريني	12/		1216	1/3	4
	قام إلى	_			_				<u> </u>	· .	-	-		/				_	1		2 8		<u>5</u>
	كالمرالع			. 19						<u>.</u>	 	_ _		/-				لارن	2/2				
	فكراله	-	-								<u> </u>	_	/					رز دنو مشرون	2/20	رو <u>ي</u> ح	2/9	1) 8	∴
1	ويدائم		-							<u>`</u> .				<u> </u>			∤	3) 3000	2/2			15 10 15 10	
	محامر المد	_			-					<u> </u>	· /-	4		 -			(الثرب	2/20		2/8/	~ +	- - ⋅ ″
	کام انع			· · · ·	,				— <u> </u>		/_	- -		<u> </u>		··			977 6	in.		, 12	
	کلیم والے مکلی والم مکلی والم	~		,	-	_ _		-		Z		_			-			4/2	7/20		8/15	- 13	⊸ 4 `
_	ر ار دنم الم								- /		٠,		-					12	420	 	2 84	14 7 15	
=								 -	/			-				-	<u> </u>		one	1217	1/	16	 - ·
_	ئاراله ميكو المو حيال المو	_		· · ·	-			_/			 -			·	 -		<u>ر</u> ن	10 m	٠, ا	<u>ئے روز</u> تو دور			-
<u>.</u>	2) 24,164		┝┾┟				_	/-		· .	<u>.</u>						- پ			رژري رژريش	8135 8/15	·	-
	محکم الم					7	1/					-		<u>:</u>			54	W- Z	PAY		90	20	
	کولم ا ل مال	_									·			•			ن ا	انطا	ı,	رسررس	8/1	21	
5	AY.	-	-			1	-				; :						<u>ل</u> في إ	120	2/2	زرن زر	7-7-2		
1	ر ر کارانہ		╁╂	· -	/		-	_			: 							ر مدر	2/20 1/20	رای رودي	8h	23	
<u> </u>	محتيرال	1-		/	<u> </u>	-	-	_		-									120	ر در گرای روسران	8/15	25	
_	نگراله م			/					-			4	-			-	-\ <u>\delta</u> (ン <u>ネ</u>		<u>ئىرىز</u>	8/15		
<u> </u>	میگر دور. مکار ا مر	*	H/-		ļ Į'	-		_				, <u>-</u>				-	رن رن		/sa	n ol		27 28	
<u> </u>	<u>ב</u> פרק קינת			 -		-						<u></u>					100	<u> : 2/</u>		<u>سريو</u> خارن	8/15 8/15	29	
	-/	-,			1 -		_	_			-	<u>:</u>		_	<u>.</u>	-	ان -	1 2/	20	خررز	8/15	30	
:	. سابقه	حال	ميرني		سابقه	خال	ن	ميزاله	ابقيه	ال ' نر	9		ميرال	1	سابقہ	عال	رند ـ	<u>رو ات</u> میزان	1-12	• 1	8/15	31	
: ::	٠,		<u> </u>					. •									+-	<u></u>		سماله		تشم رخصه اتفاقیه	i da
			1	-	. i	-		·	-	-					<u> </u>							انقالیه انتحقاقه	
	15.3							,	-		- -		<u>8 8.</u>	<u>. </u> _								بيارك	
						ريم ريمس پرديسه .						. :				<u> </u>		1		ne a		مبزال	1
	100 (100 (100 (100 (100 (100 (100 (100	4 中国	e vo	3:00			S. Baserie				٠, ٠	•						100		061-45127 (E) 1211	#/ <u>1</u>		. :

			Ĭ,						$\left\langle \cdot \right\rangle$											3	
											Williams I		-7712-2-M					-: 	- 23	April 18 years on any or any o	
		2	e.		ور	Ú	Î	1/2/	رروس	127	-/Ju	110	- jis	رار	rofe.	o the	R.		B. S.	7	
	1	-	20/					<u> </u>	نو حر	,		ر . کاہ	بابت								
زرم		البده			******			,				********					بريف	iv.	را ا		
وستخط	یآر	گرنځ 1	ل ارستا	ا رواآ	,;",	<u>ا آم</u>	وشزر	رواتلي	و خزا	آمر	. تخط	وانکی و	تخط ر	5 1					عہدہ تاریخ	_	
رخرر ریزو		2							-		\\ \frac{1}{2}			/	شریفا انترک	12/-	کرین کرین	21/5°	1 2		,
1/4		4						·				1	1/		5/	1/10	DA	Y	3	-	
		6	-								1 1		/-		ارد ارزن ارزن	720		2/15	5		
72		7									-				سر کود) (سرکف)	$\frac{1}{2}\frac{2}{2}$		2 8/1/S	7 6 7		
12/2		9						•			- /	<u> </u>		,	مقرمونی سرگانی	12/-	ر2راغ	8/15 SKJ		1	The second second
2	1	10									/				SU	2/20	191		10		
12 12 12 12 12 12 12 12 12 12 12 12 12 1	eterral t	12 13	<u>.</u>							1					100	2/20	ف رن .	-i	12		
let	سعرو 	14							-/	1					تربق		شيركش	9)/s			
<u>ק</u> ני הר	<u>-</u>	16 17							/					ļ	زين رزي	121 -		3/15			
ist	<u>. </u>	18		1 1 1		- 1					1 .				مز بنو	INZ	1A /		17		
رښ دري		19				-	/					- : .		-	100	2/20	مزرغيا	5/15 -8/15	18 19		
120	1	21				7			·						ران ران	2/20	رترن دورنو	8/15 8/15	20 21		
		23				7									مرادي مردي		مەلەپ مەلەپى	8115 315	22 23		
		25			/-	<u> </u>		:				1			5.1	14/) F 2/20	٠٤) « مشرين	210 210	24		
F .		21	<u> </u>						,		22.5				رزرز رز بد	2/2	ترزرن	8/1	26		
,		28 29		<u> </u>	-	-					• • • •				72	8/2	ارس	8/15 8/15	28	ų,	
		3(31/	/				-				4				رزمی رزبو	420	مرزدن مزدن	8/35 57,5	30		
سالة	حال	/ نامت ماتيه	ميزا	مابقيه			ميزال		سابقه	حال	اِن	<u>,,, , , , , , , , , , , , , , , , , , </u>	سابقه	عال	ا ران	<i>y</i>	سابقه	ا حال	31 نتم رضت		
		هاتيه	•.		-					<u> </u>									اتفاتیه اشتمقاتیه		
e plant	in the second	ری ران				<u> </u>													بياري		12 1
्रेट्ट श्राप	محامة	 		, ,.		r£,	***		1				!				\$1.45	12/02/12/2	مبزان	1	

وفاعلاق

روانكي وستخط آبد وتتحط روائلی آبد وستخط تاريخ تاريخ 2 2 3 3 4 4 5 5 6 6 7 7 - 8 8 -9 10 10 П 11 12 12. 13 13 1.1 3/20 14 8/15 15 9/15 15 16 3/18 مشرث عة كرن مشر 16 17 8/17 17 18 18 19 19 20 216 20 21 21. 22 22 23 23 24 12/00 (0/2) 24 25 25 26 26 27 27 28 2/3 29 d E 2//5 29 30 1. 1 30 31 Loave -31 نم خصت سالقية حال مالقه . نم رخصت سالقه إحال الفاقية اتفاتيه سخفاقيه 1 1 التحقاقيه بياري يارى ميزان ميزان و الماليات

عرب المرادي ا 12010 عبده روانكى روانگی روائلي د شخط ارخ رواتلي تاريخ . آند آند وتخط وتنخط زتخط د نط .1 1 2 2 3 3 4 ١., 6 6 ف*گواله* وگا 7 7 8 8 9 9 10 10 11 11 12 12 13 13 14 14 15 15 . 16 16 17 17 18 18 19 19 20 20 21 21 22 22 23 23. Cholor moury 24 24 25 25 DEO(M) 26 26 27 27 28. 28 order 29 29 30 30 31 31 04/08/200W UL ئىم رخصىد ئىم رخصىد ميزان سابقه سالفه جال ميزان ساابقيه ميزان إثفاقيه اتفاتيه استحقاقيه تعقاقيه بهاري بياري ميزان ميزان

(38)

The Director Education,
Elementary & Secondary Education Peshawar.

THROUGH: PROPER CHANNEL

SUBJECT: DEPARTMENTAL APPEAL AGAINST ILLEGAL STOPPAGE OF SALARY.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, RELEASE THE SALARY OF THE APPELLANT W.EFROM SEPTEMBER 2020 WITH ALL BACK BENIFITS.

RESPECTFULLY SUBMITTED:

FACTS:

- 1. That the appellant was appointed as Junior Clerk against the vacant post vide order dated 20.04.2017 on proper recommendation of departmental selection committee under deceased son Quota and posted at GHS Amir Muhammad wali. The appellant properly submitted his charge report/Arrival report and medical fitness certificate. (Copy of appointment order and medical certificate is attached as Annexure-A).
- 2. That the appellant has performed his duties assigned to him with zeal and devotion and there was no complaint, what so ever regarding his performance. Copy of attendance register is attached as annexure-B.

- 3. That the appellant performing his duties till September 2020 and suddenly the salary of the appellant has been stopped, when the appellant inquire about the stoppage of salary the clerk verbally told him the inquiry was constituted against the appellant but neither the inquiry nor the suspension order if any was communicated to the appellant, which is against the law.
- 4. Hence feeling aggrieved appellant now filling this departmental on the following grounds amongst others.

GROUNDS:

- A. That the stoppage of salary are against the law, facts, norms of justice, and material on record, therefore not tenable and liable to be set aside.
- B. That the whole proceeding conducted by the respondent department is against the law and rules.
- C. That the appellant has been condemned unheard and has not been treated according to law and rules.
- **D.** That the appellant have not been treated in accordance with law hence the appellant right secured and guaranteed under the law are badly violated.
- E. That the stoppage of salary for such a long period without any sufficient reason is illegal against the law and natural justice
- F. That not paying monthly salaries to the appellant despite that the appellant was on the strength and performed his duties, actually

amounts to an arbitrary act on the part of the respondents which is not tenable in the eyes of law.

- G. That the appellant has not been treated according to law and rules and has been deprived from the monthly salaries despite proper performance of duty, thus the action of the respondents is totally illegal and without lawful authority.
- H. That being a civil servant, the appellant is entitled to the salaries of the post in accordance with Section-17 of the Civil Servant Act, 1973.
- I. That according to superior court judgment the department cannot upheld the salary of the appellant for indefinite period.
- J. That the appellant has been condemned unheard and no prior chance of defenses or hearing was provided to the appellant while stopping his monthly salaries.
- K. That the stoppage of salary for such a long period without any sufficient reason is illegal against the law and natural justice.
- L. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as 2019 CLC 1750 stated that Audi Alterum Partum" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as 2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67.
- M. That the appellant have not been treated in accordance with law hence the appellant right secured and guaranteed under the law are badly violated.

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

Appellant
Shareef Ullah
27/09/2021

VAKALATNAMA

NO.		/20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR

Minul Sharcof Utlach Thee VERSUS	- Appellant Petitioner Plaintiff
t- t- N 01.	
Education Dept+	Respondent (s) Defendants (s)
I/WE Shaveef ullals	
do hereby appoint and constitute the SYED NOMAN ALI BUR	KHARI Advocate
High Court for the aforesaid Appellant(s), Petitioner(S)), Plaintiff(s) /
Respondent(s), Defendant(s), Opposite Party to commence an	d prosecute / to
appear and defend this action / appeal / petition / reference on my	. // our behalf and
al proceedings that may be taken in respect of any application co	onnected with the
same including proceeding in taxation and application for revi	
deposit money, to file and take documents, to accept the process	
appoint and instruct council, to represent the aforesaid Appella	,
Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree	
acts done by the aforesaid.	(c) lamily and the
DATE /20	nd wa
(CLIEN	NT)
ACCEP	red

ADVOCATE HIGH COURT

SYED NOMAN ALI BUKHARI ADVOCATE HIGH COURT

CELL NO: 0306-5109438