

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

SERVICE APPEAL NO. 357/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7973

Dated: 28/9/23

MUHAMMAD IQBAL VS HIGHER EDUCATION DEPTT:

I N D E X

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
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APPLICANTS

Through


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

C.M NO. _____/2023
IN
Service Appeal NO. 357 /2019

Mr. Muhammad Iqbal, Ex-Associate Professor (BPS-19)
Government Degree College, Jamrud, Tribal District Khyber.

VS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary, KPK Peshawar.
2. The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
3. The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
4. The Secretary Higher Education, Archives & Library Department, Civil Secretariat, Peshawar.
5. The Director, Higher Education, Archives & Library Department, Khyber Pakhtunkhwa, Peshawar.

APPLICATION FOR IMPLEADMENT OF THE APPLICANTS BEING NECESSARY PARTIES IN THE ABOVE TITLED SERVICE APPEAL ON THE PANEL OF THE PETITIONERS.

1. Mst: Farzana Iqbal, widow
2. Waqas Sannan
3. Owais Sannan
4. Danyal Sannan
5. Salal Ahmad, sons of Muhammad Iqbal (late), all residents of Ghaz Beko Kallay, Mandani, Tehsil Tangi District Charsadda.

Respectfully Sheweth:

1. That the above captioned Service Appeal is pending adjudication before this Hon'ble Tribunal, which is fixed for 02/10/2023.
2. That during pendency of the instant service appeal, the appellant has been died. Copy of Death certificate is attached as Annexure.....**A**
3. That present Applicants being his legal heirs, are necessary parties to the instant service appeal, therefore requesting to be impleaded on the panel of the appellants. Copy of FRC is attached as Annexure.....**B**

4. That if the present applicants are not impleaded, then there is apprehension of the round of litigation.
5. That the applicants seeks permission to advance other grounds and proofs at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this application, the present applicants may kindly be impleaded on the panel of the appellants in the interest of justice.

Dated 27.09.2023

APPLICANTS

THROUGH:



**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

AFFIDAVIT

I, Owais Sannan S/o Muhammad Iqbal (late), R/o Ghaz Beko Kallay, Mandani, Tehsil Tangi District Charsadda (applicant No 3/ special attorney for remaining applicants), do hereby solemnly affirm that the contents of this **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.



**DEPONENT
CNIC NO: 17102-5256327-7**



حکومت خیبر پختونخوا پاکستان

Govt of Khyber Pakhtunkhwa Pakistan

اندراج وفات سرٹیفکیٹ



"A" -3-

Tracking Id: 91100015515185

CRMS No. D648673027

OLD/M REG #:

Death Registration Certificate

BARIBANDAN_1000600 : دفتر اندراج

Old CRMS No. :

Deceased Person's Details

متوفی کے کوائف

Name :	Muhammad Iqbal	نام :	محمد اقبال
Nationality :	Pakistani	قومیت :	پاکستانی
CNIC No :	17102-1155919-3	شناختی کارڈ :	17102-1155919-3
Date of Birth :	01-Dec-1957	تاریخ پیدائش :	01-Dec-1957
Gender :	Male	جنس :	مرد
Religion :	Islam	مذہب :	اسلام
Sickness Period :	00 Days 00 Months 00 Years	مدت علالت :	00 دن 00 ماہ 00 سال
Date of Death :	02-Feb-2023	تاریخ وفات :	02-Feb-2023
Date of Burial/Last rite :	02-Feb-2023	تاریخ تدفین/آخری رسومات :	02-Feb-2023
Place of Death :	Home	جائے وفات :	گھر
Reason of Death :	Natural	وجہ وفات :	قدرتی
Nature of Death :	Normal	کیفیت وفات :	عام
Buried/Last rite at :	Farch Colony	جگہ تدفین/آخری رسومات :	فرش کالونی

Parental Information

والدین کے کوائف

Father's Name :	Muhammad Said Jan	والد کا نام :	محمد سیدجان
CNIC No :	17102-1165610-1	شناختی کارڈ :	17102-1165610-1
Mother's Name :	Samandro	والدہ کا نام :	سمندرو
CNIC No :	17102-1114223-2	شناختی کارڈ :	17102-1114223-2

Address

پتہ

Address :	Ghazbeco Killi Village Bari Bandan , Post Office Mandani	پتہ :	غازبیکو کلبے گاؤں ہاڑی بندن ، ڈاکخانہ منڈنی
Tehsil :	Tangi	تحصیل :	تنگی
District :	Charsadda	ضلع :	چارسدہ

Applicant's Details

درخواست دہندہ کے کوائف

Name :	Farzana Iqbal	نام :	فرزانہ اقبال
CNIC No :	17102-1111361-2	شناختی کارڈ :	17102-1111361-2
Relation with Deceased :	Husband	متوفی سے رشتہ :	خاوند

Information of Burial/Last rite by

تدفین/آخری رسومات کنندہ کے کوائف

Name :	Waqas Sannan	نام :	وقاص سنان
CNIC No :	17101-8071711-3	شناختی کارڈ :	17101-8071711-3
Relation with Deceased :	Son	متوفی سے رشتہ :	بیٹا

Entry Date : 14-Feb-2023

تاریخ اندراج : 14-Feb-2023

Issue Date : 15-Feb-2023

تاریخ اجراء : 15-Feb-2023

Entry Status : Late

اندراج اسٹیٹس : لیٹ

Additional Information:

اضافی معلومات :



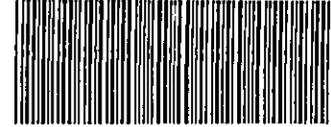
ولج کیوبل ہاڑی بندن
تحصیل تنگی ضلع چارسدہ

SECRETARY
V.C. Bari Bandan
Tehsil Tangi Distt: Charsadda

ATTTESTED



"B"
-4-



AA93068521

FAMILY REGISTRATION CERTIFICATE

Applicant Name: Waqas Sannan **Family Members:** 6
Citizen Number: 17101-8071711-3
Document Number: AA93068521

It is to certify that the family comprising of the following family members is registered in NADRA with the particulars mentioned below as per the information provided.



Name: Muhammad Iqbal
Identity Number: 17102-1155919-3
Date of Birth: 1957-12-01
Father Name: Muhammad Said Jan
Mother Name: Samandro
Relation With Applicant: Father

محمد اقبال: پورا نام:
محمد سيدجان: والد کا نام:
سمندرو: والدہ کا نام:



Name: Farzana Iqbal
Identity Number: 17102-1111361-2
Date of Birth: 1971-03-02
Father Name: Fazli Raziq
Mother Name: Meher Jana
Relation With Applicant: Mother

فرزاتہ اقبال: پورا نام:
فضل رازق: والد کا نام:
مہر جانہ: والدہ کا نام:



Name: Waqas Sannan
Identity Number: 17101-8071711-3
Date of Birth: 1997-03-20
Father Name: Muhammad Iqbal
Mother Name: Farzana Iqbal
Relation With Applicant: Self

وقاص سنان: پورا نام:
محمد اقبال: والد کا نام:
فرزاتہ اقبال: والدہ کا نام:



Name: Owais Sannan
Identity Number: 17102-5256327-7
Date of Birth: 1998-04-10
Father Name: Muhammad Iqbal
Mother Name: Farzana Iqbal
Relation With Applicant: Brother

اویس سنان: پورا نام:
محمد اقبال: والد کا نام:
فرزاتہ اقبال: والدہ کا نام:



Name: Danyal Sannan
Identity Number: 17102-5300074-7
Date of Birth: 2001-08-12
Father Name: Muhammad Iqbal
Mother Name: Farzana Iqbal
Relation With Applicant: Brother

دانیال سنان: پورا نام:
محمد اقبال: والد کا نام:
فرزاتہ اقبال: والدہ کا نام:



Name: Salal Ahmad
Identity Number: 17102-5914069-5
Date of Birth: 2012-07-08
Father Name: Muhammad Iqbal
Mother Name: Farzana Iqbal
Relation With Applicant: Brother

سلال احمد: پورا نام:
محمد اقبال: والد کا نام:
فرزاتہ اقبال: والدہ کا نام:

NOTE:

- The above mentioned family members are linked in NADRA database.
- There could be other family members that may be registered but not linked to this family in NADRA database.

Dr. Farhatullah

REGISTRAR GENERAL OF PAKISTAN

Date of Issue: 22-Sep-2022



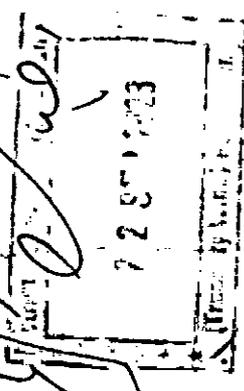
1710180717113

ATTESTED

26/8

فرمانہ

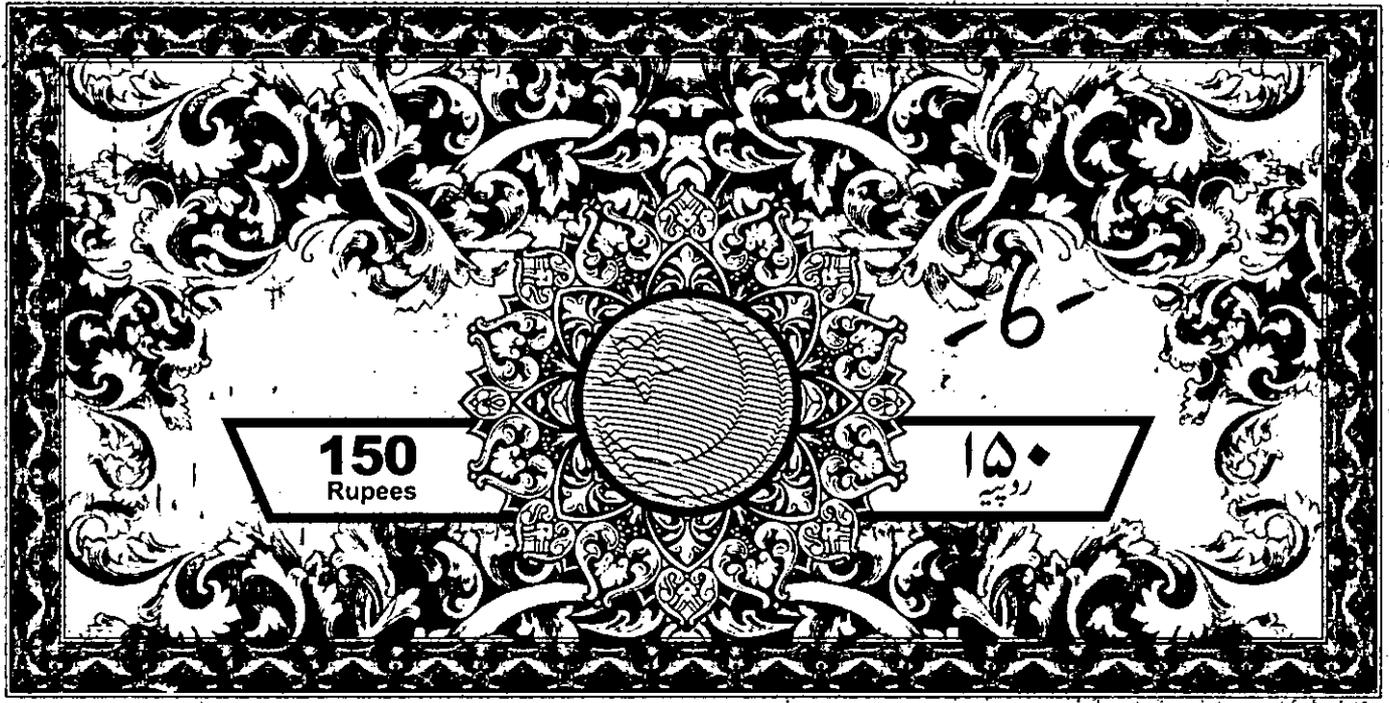
محمد علی احمد



محمد علی احمد

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MUMBAI

2003



We shall be having no objection to the acts performed by the said attorney on our behalf.

Therefore, this Special Power of Attorney is signed and executed in favour of above mentioned person in presence of witnesses on this 26th day of September, 2023.

ACCEPTED BY:

Owais Sannan
CNIC: 17102-5256327-7

Owais

EXECUTANT

Mst: Farzana Iqbal
CNIC: 17102-1111361-2

فرزانہ

Waqas Sannan
CNIC: 17101-8071711-3

Waqas Sannan

Danyal Sannan
CNIC: 17102-5300074-7

Danyal

Salal Ahmad,
CNIC: 17102-5914069-5

Salal Ahmad

WITNESS No.1

SULIAN MUHAMMAD
CNIC: 1710211420325



WITNESS No.2

MUHAMMAD ISHAQ
CNIC: 1710211539571

Muhammad Ishaq

Handwritten signature in Urdu script, likely reading "Mirza Asif Ahmad".

26/7/73

District of ...
22 SEP 73
District of ...

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VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No 357/2019

M. Isbal

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

H/Education Deptt

(RESPONDENT)
(DEFENDANT)

I/We Appellants

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our 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. ___/___/202

CLIENT

Awais Saham special Attorney

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

Waleed Adnan
WALEED ADNAN

Umar Farooq Mohmand
UMAR FAROOQ MOHMAND

Muhammad Ayub
MUHAMMAD AYUB

&

Mahmood Jan
**MAHMOOD JAN
ADVOCATES**

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(0311-9314232)