

25.05.2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Farhan, Assistant for the respondents present.

Written reply/comments on behalf of respondents submitted which is placed on file. Copy of the same is handed over to the learned counsel for the appellant. To come up for rejoinder if any, and arguments on 10.08.2022 before D.B.



(Mian Muhammad)  
Member (E)

10-8-2022

Proper DB not available the case is adjourned to 2-11-22

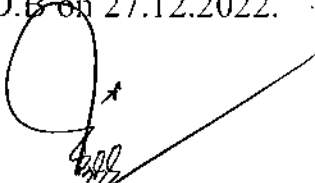


Reader

02.11.2022

Junior of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is indisposed of today. Adjourned. To come up for arguments before the D.B on 27.12.2022.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

27-12-22

Due to winter vacation, the case is adjourned to

4-4-23



Reader

20.12.2021  
25.05.2022

Appellant present through counsel.

Learmed counsel for the appellant present. Mr. Noor Zaman, Khattak, District Attorney, alongwith Mr. Farhan, Preliminary arguments heard. Record perused. Assistant for the respondents present.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. Written reply/comments on behalf of respondents submitted which is placed on file. Copy of the same is handed over to the learned counsel for the appellant. To come up for fee within 10 days. Thereafter, notice be issued to rejoinder if any, and arguments on 10.08.2022 before D.B. respondents for submission of written reply/comments. To

Appellant Deposited  
Security & Process Fee

11/01/22

come up for written reply/comments on 07.03.2022 before S.B.

(Mian Muhammad)  
Member (E)

(Rozina Rehman)  
Member (J)

7-3-2022

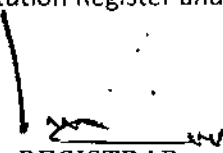

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 25/5/2022

Reader

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7713 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/11/2021	<p>The appeal of Mr. Asmat Ullah resubmitted today by Mr. Taimur Haider Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>20/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>[Faint handwritten notes in Urdu are visible in the background of this section.]</i></p>

The appeal of Mr. Asmat Ullah son of Rasool Bacha, R/O Village Malagay Banda, P/O Sabirabad, Tehsil and District Karak received today i.e. on 18.10.2021-is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


1. Copies of academic record annexed as annexure A is not attached with the appeal.
2. Appointment order date mentioned in para-2 of memo of the appeal and attached document are different.
3. Annexures of the appeal may be attested.
4. Certificate be given to the effect that the appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.

No. 2075 /S.T,

Dt. 18/10 /2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Haider Khan Adv. Pesh.

The needful has been done -  
File re-submitted today -  
  
Taimur Haider Khan  
Advocate High Court  
18/10/21


**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST**

Case Title: Asmat ullah Khan vs Govt of KP & others

S.#	Contents	Yes	No
1.	This appeal has been presented by: _____	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents? ✓		
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?		
17.	Whether list of books has been provided at the end of the appeal? 101		
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on _____		
26.	Whether copies of comments/reply/rejoinder submitted? on _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Taimur Haider Khan

Signature: 

Dated: 18-10-2021

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

Service Appeal No. \_\_\_\_\_/2021

Asmat Ullah Khan S/O Rasool Bache R/O Village Malagay  
Banda, P/O Sabir Abad, Tehsil & District Karak.  
Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary  
Higher Education, Peshawar & Others.....Respondents

**INDEX**

Sr#	Description	Annexure	Pages
1.	Service Appeal		1-6
2.	Application for condonation of delay along with Affidavit		6-8
3.	Copies of Academic Record	A	10-17
4.	Copy of the appointment order of the year 2013	B	18-24
5.	Copy of P.hd Degree	C	25-26
6.	Copy of the application for getting NOC and impugned removal order dated:25.07.2016	D	27-33
7.	Copies of the Medical Documents	E	34-42
8.	Copy of the corresponding letters <i>Support material for appeal</i>	F & G	43-48
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Through

Taimour Haider Khan  
&  
Malik Sajid Khan

Advocate, High Court,  
Taimour Law Associates  
Office: 37<sup>th</sup>, 2<sup>nd</sup> Floor,  
Malik Tower, Peshawar  
Cell No.0346-9192561

Dated:04.10.2021

(1)

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

Service Appeal No. \_\_\_\_\_/2021

Asmat Ullah Khan S/O Rasool Bacha R/O Village Malagay  
Banda, P/O Sabir Abad, Tehsil & District Karak.

.....Appellant

**VERSUS**

- 1) Government of Khyber Pakhtunkhwa through Secretary  
Higher Education, Peshawar.
- 2) Director, Higher Education Khyber Pakhtunkhwa,  
Peshawar
- 3) Principal Government post Graduate College, Karak.

.....Respondents

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**APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT,  
1974 R/W ARTICLE 25 & 27 OF THE  
CONSTITUTION OF PAKISTAN 1973  
AGAINST THE IMPUGNED AND CORAM-  
NON-JUDICE ORDER DATED:25.07.2016  
VIDES NOTIFICATION NO.3013-16  
WHEREBY THE APPELLANT HAS BEEN  
TERMINATED FROM THE SERVICE I.E  
POST OF LECTURER (BIOLOGY) WITH THE  
SOLE REASON OF HAVING WILLFUL  
ABSENCE BY NOT SEEKING  
PERMISSION/NOC REGARDING POST  
GRADUATE STUDY AT ABROAD. DESPITE**

(2)

THE FACT THE APPELLANT WAS ASSURED THAT WITHOUT ANY WORRY THE P.HD VIA SCHOLARSHIP MAY BE COMPLETED AT BRAZIL.

KEEPING IN VIEW EXACTLY ON THE SAME FOOTING THE RESPONDENTS HAS BEEN GIVEN THE STUDY LEAVE TO THE REST OF THE COLLEAGUES EVEN WITHOUT GIVING PERMISSION THEY WERE ALSO PROCEEDED ABROAD FOR GETTING P.HD DEGREE/HIGHER STUDIES BUT NOW ADVERSE ORDER/ACTION OF WHATSOEVER HAS BEEN TAKEN AGAINST THEM.

**PRAYER:**

*It is, therefore, most convivially and courteously prayed that on the basis of expounded subjects and facts & circumstances, the impugned termination order may kindly be set aside and the respondents may kindly be directed to reinstate the appellant on his post with all retrospective benefits for the best administration of justice and fair play.*

Respectfully Submitted;

- 1) That with profound veneration, the appellant hails from venerable family and having outstanding academic record. Hold P.hd Degree from University of UFMG (Universidade Federal de Minas Gerais Brazil) in biological science. (Copies of Academic Record is annexed as Annexure "A").



- 2) That in the year 2010, the provincial public service commission has advertised certain post in the local daily. The appellant being fulfilling the required touchstone has applied for the post of Lecturer (Biology) and the appellant has top the said exam throughout Khyber Pakhtunkhwa and was appointed as Lecturer Biology in Government Post Graduate College Karak. **(Copy of the appointment order of the year 2013 is annexed as Annexure "B").**
- 3) That since the inception of the appellant in the respondents' Department, the appellant hold a soft and sober gentleman. Due to his qualitative skills and experiences was tried his level best to keep the moral of the college high and was having unblemished service career.
- 4) That it is rudimentary aspect of the fact that to get education Higher Education is one of the fundamental right as enshrined in the constitution of Pakistan 1973. In such a scenario, the appellant being having M-Phil Degree was wishing to have post graduate qualification and for that matter, the appellant has served series of applications to the respondents to get NOC in order to accomplish the successful destiny of P.h.d. It is also indispensable to mentioned here that exactly on the same footing, prior to the appellant/colleagues/other lecturers of different colleges have also applied for getting NOCs but without deciding/pendency of the fate of application, were proceeded at abroad via scholarship for the completion of higher studies. It is also imperative to mentioned here that during their studies at abroad the ibid applications for NOC was allowed/granted. The details of all these employees letters could be provided later on.
- 5) That as expounded in the subject, the appellant was successful to get scholarship for higher studies in one of the

reputable University of Brazil. Though the scholarship was accomplish but unfortunately the respondents were dilly dallying to give proper NOC via study leave for ibid education. Hence, the appellant was in doldrums, as the time of scholarship/higher studies was about to vanish. The appellant being on the equal footing was also proceeded abroad for higher studies as the hope of allowing the application for getting NOC was given. Accordingly the appellant desire and fundamental right of higher Education was accomplished and remain successful to get P.hd from one of the reputable University of Brazil in the year 2019. (Copy of P.hd Degree is annexed as Annexure "C").

6) That after the successful completion of P.hd and when the appellant was came back to Pakistan. The appellant shocked and astonish to know that his services in the respondents college has been removed by the respondents vides unjustifiable coram-non-judice and impugned order dated:25.07.2016 and impugned notification No. SO (C-II)HED/12-3/2014/3013-16 dated 25.07.2016. (Copy of the application for getting NOC and impugned removal order dated:25.07.2016 is annexed as Annexure "D")

7) That it is also imperative to mention here that without any sort of explanation, inquiry, letter, intimation, the appellant has been removed from service with a single stroke of pen by completely violating the supreme principle of "Audi Alterm Partum". So much so, the appellant has been discriminated despite the fact the same benefit has been extended to the rest of colleagues of the appellant.

8) That it is also indispensable to bring into the kind knowledge of this Hon'ble Tribunal after getting higher degree, the appellant was mentally strained to know that he was removed from services and further aggravated to

indulge in dilapidated health condition of having life threatening diseases of (Back Bone) which have suffered the precious time of the appellant and remained on the bed for more than two years. Infact the reason behind the panic and gigantic road accident was the impugned order of removal from service. (Copies of the Medical Documents is annexed as Annexure "E").

9) That it is also the coherent fact that the principal of the post Graduate College Karak has duly corresponded the appellant's application for the needful via higher ups to the directorate of Higher Education and vice versa. (Copy of the corresponding letters are annexed as Annexure "E").

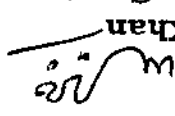
10) That as mentioned above, that the appellant was having outstanding academic record, holds "A" Grade throughout his entire qualification and for that purpose of getting the vested rights of higher studies, the appellant has been removed from services, despite the fact, that since 2012 in order to encourage Employees of the Higher Education, the Government/respondent themselves providing "Faculty Development Scholarship" (FDS) for getting M.Phil and Ph.d Degree with high incentives, but unfortunately for getting the same studies, the appellant has also proceeded abroad, which is more advanced from the local Universities' degrees and instead to appreciate the respondent has crippled the service of the appellant.

11) That after the recovery from the ibid dilapidated disease, the appellant has filed Departmental Appeal to the respondents but the respondents were dilly dallying the matter with undue and untrue commitments but till that the same has not been decided and hence in such a doldrums sort of situation, the appellant is having no other option but to put his grievances in the mercy of this Hon'ble Tribunal for the needful. (Copy of the Departmental Appeal is annexed as Annexure "G")

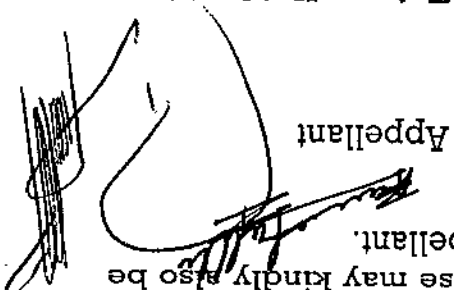


Dated: 04.10.2021

Malak Sajid Khan  
Advocate, High Court,  
Taimur Law Associates  
Off: 37<sup>th</sup>, 2<sup>nd</sup> Floor,  
Mahk Tower, Peshawar  
Cell No. 0346-9192561

  
&

Taimur Haider Khan

  
Appellant

Through

Any other relief deems appropriate in the circumstances of the case may kindly also be granted in favour of appellant.

*It is, therefore, most convivially and courteously prayed that on the basis of expounded subjects and facts & circumstances the impugned termination order may kindly be set aside and the respondents may kindly be directed to re-instate the appellant on his post with, all retrospective benefits for the best administration of justice and fair play.*

**PRAYER**

- 12) That so much so, the respondents are even reluctant to provide the experience certificate for the services rendered by the appellant and in such doltrums sort of situation, the appellant is unable to apply to any of the relevant post due to the issue of no previous experience and over aged factor.
- 13) That the mentioned subject & facts may kindly be considered as Grounds for the instant service appeal and any other point may be raised at the time of arguments for the best assistance of this Hon'ble Court.

(7)

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

C.M No. \_\_\_\_\_/2021

In

Service Appeal No. \_\_\_\_\_/2021

Asmat Ullah Khan S/O Rasool Bacha R/O Village Malagay  
Banda, P/O Sabir Abad, Tehsil & District Karak.

.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary  
Higher Education, Peshawar & Others.....Respondents

**APPLICATION FOR THE CONDONATION OF  
DELAY AS THE APPELLANT/PETITIONER WAS  
INDULGED IN DILAPIDATED HEALTH  
CONDITION OF HAVING life threatening diseases  
of back bone/spinal cord AND RESULTANTLY  
WERE LYING ON BED FOR LONG TIME BEING  
CLEARED FROM THE ATTACHED MEDICAL  
DOCUMENTS THE DETAIL OF AILING IS  
FURTHER CLEARED FROM PARA NO.08 OF THE  
MAIN APPEAL.**

**PRAYER:**

*By acceptance of this application on the basis of expounded  
subjects, facts and circumstances, the delay in filing of the  
appeal if any may kindly be condoned, in the interest of  
justice and fair play.*

Respectfully Sheweth: -

1. That the appellant has filed an appeal in which no date has been fixed.
2. That as expounded in the subject and also cleared from Para No.08 of the main appeal, via Medical Documents, the appellant was indulged in a life threatening disease
3. That the delay in filing of the appeal is not intentional or deliberate rather due to above reason and to complete the P.hd Degree at Brazil.
4. That if the delay is not condoned, the petitioner will suffer an irreparable loss and injury.

**PRAYER**

*It is therefore most humbly prayed that by acceptance of this application on the basis of expounded subjects, facts and circumstances, the delay in filing of the appeal if any may kindly be condoned, in the interest of justice and fair play.*



Appellant

Through

**Taimur Haider Khan**

&

**Malak Sajid Khan**

Advocate, High Court.

**Taimur Law Associates**

Off: 37<sup>th</sup>, 2<sup>nd</sup> Floor,

Malik Tower, Peshawar

Cell No.0346-9192561

Dated:04.10.2021

9

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

C.M No. \_\_\_\_\_/2021

In

Service Appeal No. \_\_\_\_\_/2021

Asmat Ullah Khan S/O Rasool Bacha R/O Village Malagay  
Banda, P/O Sabir Abad, Tehsil & District Karak.

.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary  
Higher Education, Peshawar & Others.....**Respondents**

**AFFIDAVIT**

I, Asmat Ullah Khan S/O Rasool Bacha, R/O Village  
Malagay Banda, P/O Sabir Abad, Tehsil & District Karak do  
hereby solemnly affirm and declares that the contents of instant  
**Application as well as main Appeal** are true and correct to the  
best of my knowledge and belief and nothing has been kept  
concealed from this Hon'ble Court.

*Asmat Ullah Khan*

Deponent

CNIC# 14301-27374575

Cell# 0333-9647965

Identified by:

*[Signature]*

**Taimur Haider Khan,**  
Advocate, High Court.

*[Signature]*  
18-10-21  
KHYBER PAKHTUNKHWA  
ATTORNEY GENERAL  
PESHAWAR

(10)

"A"

Amesmu

S.No.KB 20948

Roll No. 11377

(15)  
(66)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



MARKS  
IMPROVED

**KOHAT**

(N.W.F.P. Pakistan)

**Secondary School Certificate Examination**

SESSION 2003 (Supply)

THIS IS TO CERTIFY THAT ASMAT ULLAH KHAN

Son/Daughter of RASOOL BAD SHAH and a student of DISTRICT KOHAT

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Kohat held in September, 2003 as a PRIVATE candidate. He/She obtained 608 Marks out of 850 and has been placed in Grade A Representing Excellent

The Candidate passed in the following subjects:

- |                |                   |                     |                   |
|----------------|-------------------|---------------------|-------------------|
| 1. English     | 2. Urdu           | 3. Islamiyat        | 4. Pak. Studies   |
| 5. Mathematics | 6. <u>PHYSICS</u> | 7. <u>CHEMISTRY</u> | 8. <u>BIOLOGY</u> |

Date of birth according to admission form is 01-Sep-1987

*Asst. Secretary*  
Asst. Secretary

*Secretary*  
Secretary

This certificate is issued without alteration or erasure.  
Issued in lieu of Roll No. 35300 Annual Exam 2003



(11)

S.No. KB 4536

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 33551

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**KOHAT**

**(N.W.F.P. Pakistan)**

**INTERMEDIATE EXAMINATION**

**PRE-MEDICAL GROUP**

**Session 2005 (Annual)**

This is to Certify that Asmat Ullah Khan

Son/Daughter of Rasool Bad Shah

and a student of Govt Post Graduate College Kohat

Registered No 60-Bk/GCKT-2003 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Kohat held in May, 2005 as a Regular candidate. He/She obtained 813 marks out of 1100 and has been placed in A Grade Representing Excellent.

The Examination was taken as a whole / in parts.

*[Signature]*  
Asstt. Secretary

*[Signature]*  
Secretary

*This certificate is issued without alteration or erasure.*

Serial No. 000890  
Roll No. 7600

Registration No.  
2005-K-19

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

# Kohat University of Science & Technology, Kohat (Pakistan)

Session 2005-2007

ASMAT ULLAH KHAN Son of FAZOOL BAO SHAH and a student  
of GOVT POST GRADUATE COLLEGE KOHAT having passed the prescribed  
examination held in JULY 2007 is this day admitted by

The Kohat University of Science & Technology, Kohat  
to the Degree of  
**Bachelor of Science**  
in the FIRST Division

The Examination was taken as a whole / in parts



Controller of Examinations  
Countersigned

\_\_\_\_\_  
Vice Chancellor

Result declared on 4TH OCTOBER 2007

12

Serial No. 000163

Enrollment No. Z0320101007

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Registration No. 2005-K-19

# Kohat University of Science & Technology, Kohat (Pakistan)

ASMAT ULLAH KHAN

Son / Daughters of

FASOOL BAD SHAH

having completed the course of study approved by the University and passed the prescribed examinations has been admitted to the Degree of

## Master of Philosophy

in the subject of

ZOOLOGY.

The field of specialization being

" MOLECULAR PARASITOLOGY "



Result declared on JUNE 18, 2013

13

Controller of Examinations

Counterigned

Vice-Chancellor

19

Serial No: 000161

Registration No: 2005-K-19

**KOHAT UNIVERSITY OF SCIENCE AND TECHNOLOGY  
(PAKISTAN)**

**Asmat Ullah Khan**

son of

**Rasool Badshah**

and a student of the Department of Zoology

having fulfilled the requirements has been duly admitted to

the degree of

**Master of Science**

in

**Zoology**



  
Controller of Examinations

Kohat Feb 10, 2011

  
Vice Chancellor

(15)

Verified

Fozul Bariobi

Regional Director  
Regional Office  
Sector 03, Islamabad

Signature of Fozul Bariobi  
19.03.10

Signature of R. Raahman  
Kafkat University of Science  
Kohat

**BRAZIL** (5.00) (12079015)

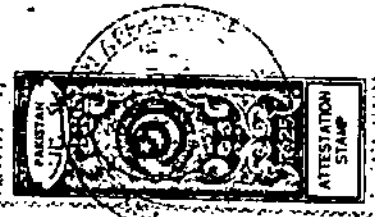
Prova de conhecimento em português da Língua Portuguesa para a função de Professor de Português para estrangeiros.

**BRASIL** (5.00) (12079015)

Prova de conhecimento em português da Língua Portuguesa para a função de Professor de Português para estrangeiros.

Assessor: **FABIO ANTONIO DO ROSARIO**  
Vice-Cônsul

*Fozul Bariobi*



COPY OFFICE  
STREET PESHAWAR



Embarcada de Fronteira Internacional

23 DEC 2014

*Signature*  
**DANWOOD KHAN**  
Assistant Principal Officer  
Ministry of Foreign Affairs  
Camp Office Peshawar

Prepared by: *[Signature]*  
Checked by: *[Signature]*  
19.03.10

(16)

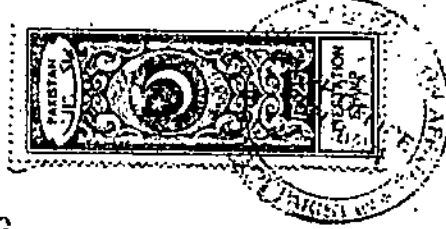
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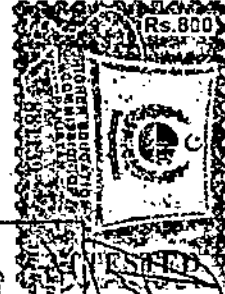
Registration &

*[Signature]*  
Deputy Controller of Examinations  
2012-19

Camp Office  
Hawar Ajjelation  
155-2865



*[Signature]*  
Controller of Examinations  
Rohat University of Science & Technology  
Rohat



*[Signature]*  
MUR RAHMAN  
Director (Registration)  
Office for the Commission  
Ministry of Education  
Government of Punjab  
Lahore

23 DEC 2014

Embassade do Brasil  
Islamabad

*[Signature]*  
DAWOOD KHAN  
Assistant Professor / Officer  
30 DEC 2014  
Ministry of Foreign Affairs  
Camp Office Peshawar

BRAS  
BRAS

5.00

Pague R\$ 6,00 - Que  
USD 5,00 - TEC 4102

7241114 ATENCÃO  
Se o nome no cartão  
de barras for diferente  
deste escreva E.F.A.B.A.

Identifique, verifique e desdote o número de dados no cartão  
(2201) 99191

PADJO ANTONIO DO ROSARIO

Depois de a legitação de natureza contante de acordo com o art. 2º, do Dec. nº 45.100,  
a presente legitação não poderá ser aceita de novo de documento.

*[Signature]*  
09.02.14

*[Signature]*  
11/2/14

(17)

ACQUIRED

Foreign Section

SUGGESTION

Deputy Director  
NIST

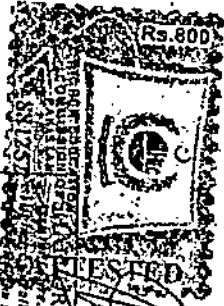
*[Handwritten signature]*

~~Confidential~~  
Robert University of Science & Technology  
Kabul

*[Handwritten signature]*

*[Handwritten signature]*  
11/19/13

Required by: *[Handwritten signature]*  
Checked by: *[Handwritten signature]*



26 DEC 2014

ALIMAN  
Refugee Commission  
Office  
Government of Pakistan

Embaixada de Brasil  
Istiambul

DAWOOD KHAN  
Assistant Protocol Officer  
30 DEC 2014  
Ministry of Foreign Affairs  
Camp Office Peshawar

**BRA** GOVERNMENT OF BRAZIL  
72481843J

Embaixada do Brasil em Istambul  
Rua ... 4102-1501/22-000003

Acordo de viagem por sermão e assinatura neste documento de Dawood Khan, Assistent Protocol Officer do (o) Ministry of Foreign Affairs, Camp Office Peshawar, Peshawar, Paquistão. Equivalente a um documento de viagem, mandei passar o presente, que assinai e fiz selar com o selo deste(s) Embaixada.

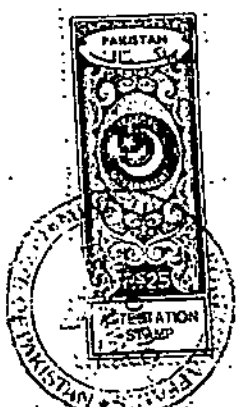
Utilizado, vinte e dois de janeiro de dois mil e quatorze (22/01/2014)

*[Handwritten signature]*  
FABIO ANTONIO DO ROSARIO  
Vice-Cônsul

72481843 ATENÇÃO  
Se o número no código de barras for diferente, esta etiqueta É FALSA.

Dependência a legitimação da autoridade consular de acordo com o art. 2º, de Dec. 84.431/00.  
A presente legitimação não implica aceitação do teor do documento.

Camp Office  
Peshawar  
29-65



18

"B"



**GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT**

Dated Peshawar the 28.06.2013.

**NOTIFICATION**

**NO. SO(COLLEGES-II)HED/10-3/2012.** Consequent upon the recommendation of Khyber Pakhtunkhwa Public Service Commission, the Competent Authority is pleased to appoint the following recommendees as lecturers in **Biology (BPS-17)** of College Cadre in Higher Education Department with immediate effect on the terms and conditions noted below and to post them in the colleges noted against each:

S.No.	Name/Father's Name / Address	Posted at	Remarks
1.	Mr. Asmat Ullah Khan S/o Rasool Badshah C/o Rasool Badshah, S.E.T G.H.S.No. 2, Kohat City.	Govt. Degree College, Thall, Hangu.	Against vacant post
2.	Mr. Muhammad Israr S/o Nisar Muhammad District and Tehsil Mardan, P/o Manga, Village Hospital Killi.	Govt. Degree College, Katiang, Mardan.	Against vacant post
3.	Mr. Majid Khan S/o Allah Noor Badshah Village and P.O Saddo District Dir Lower Tehsil Timergara.	Govt. Degree College, Palal, Malakand.	Against vacant post
4.	Mr. Aamir Abbas Shah S/o Jafir Hussain Shah C/o Riaz Jara Principal Iqra Science School Paharpur, Tehsil Paharpur, District D.I. Khan.	Govt. Degree College, Paharpur, D.I. Khan.	Against vacant post
5.	Mr. Muhammad Israr Khan S/o Lal Zada Village Tordher, P.o Sakh No. 6, Tehsil Tangi, District Charsadda.	Govt. Degree College, Zarabi, Swabi.	Against vacant post
6.	Mr. Usman Ullah S/o Khair Ul Haq Village Adokey, Tehsil, P.O Khall, District Dir Lower.	Govt. Degree College, Dir Upper.	Against vacant post
7.	Mr. Shujat Ali S/o Muhammad Tariq House # TC-1488 Allama Iqbal Colony Muree Road Nawan Sher, Abbottabad.	Govt. Degree College, Sherwan, Abbottabad.	Against vacant post
8.	Muhammad Naeem Ullah S/o Muhammad Hashim Khan P/O khawaja Ahmad Mandan, Bannu.	Govt. Degree College, S.K. Bala, Bannu.	Against vacant post
9.	Mr. Waqas Khan S/o Afza Khan Village Neelore P/o Nawan Sher District and Tehsil Abbottabad.	Govt. Degree College, Oghi, Manshra.	Against vacant post
10.	Mr. Mustafa Kamal S/o Bunir Khan Village Manja Khel P/o Taji Kela District Bannu.	Govt. Degree College, Landi Jahra, Bannu.	Against vacant post
11.	Mr. Irfan Babar S/o Aida Muhammad Village and Post Office Masma Tehsil & District Peshawar.	Govt. Degree College, Chagharmati, Peshawar.	Against vacant post





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cc  
B  
A. H. S. S. S.

**GOVT. OF KHYBER PAKHTUNKHWA**  
**HIGHER EDUCATION, ARCHIVES &**  
**LIBRARIES DEPARTMENT**

Dated Peshawar the 02.07.2013.

**CORRIGENDUM**

**NO. SO(C-ID)HED/10-3/HED/2013:** In partial modification of this Department Notification of even number dated 28.6.2013, the following corrections are hereby made to the stations of posting of the officers at various Sr. NOs. mentioned against each:

Sr. No	Sr. No of Notification	Name of the office with current entries and substituted entries
1	1	Place of posting of Mr. Asmatullah Khan, lecturer in Biology may be read as GPGC, Karak instead of GDC Thall, Hangu.
2	3	Place of posting of Mr. Majid Khan, lecturer in Biology may be read as GPGC, Timergara, Dir Lower (against the post of BS-18 in his own pay and scale) instead of GDC Palai, Malakand.
3	12	Place of posting of Mr. Sharafat Ali, lecturer in Biology may be read as Govt. AKL PGC, Matta, Swat (already working here as adhoc lecturer) instead of GDC Chakesar, Shangla.

**SECRETARY TO GOVT. OF**  
**KHYBER PAKHTUNKHWA**  
**HIGHER EDUCATION DEPARTMENT**

**ENDST: NO. & DATE EVEN:**

Copy of the above is forwarded to the:

1. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal of the Govt. College concerned.
3. District Accounts Officer concerned.
4. Officer concerned.

**(HABIB-UR-RAHMAN)**  
**SECTION OFFICER (COLLEGES-II)**

GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVE  
LIBRARIES DEPARTMENT

1/3

Dated Peshawar the November 04<sup>th</sup>, 2010.**NOTIFICATION**

No. SO(COLLEGES)2-5/2010. Consequent upon the recommendations of Departmental Selection Committee, the Competent Authority is pleased to appoint the following Male Lecturers (BPS-17) on adhoc basis as a stop gap arrangements for a period of one year or till the availability of selectees of Khyber Pakhtunkhwa Public Service Commission whichever is earlier and to post / adjust them in the colleges mentioned against each:

S#	Name & Address	Subject	Zone-	Posted at	Remarks
1.	Amir Dost Khan S/o Muhammad Sultan, Village & P/o Bar Shawar Shamkani, Tehsil Matto, District Swat.	Computer Science	Disable Zone-III Swat	GPGC Salto Sharif, Swat.	A.V.P
2.	Tarveer Usman S/o Usman Ghani, Mohalla Shaban, Village & P.O. Kherabad, Nowshera.	Maths	Disable Zone-II Nowshera	GPGC Mardan	A.V.P
3.	Usaid Ali S/o Abdul Ghafoor, Moh. Badnam Khel, V.P.O Gojar Garhi, Tehsil & District Mardan.	Economics	Disable Zone-II Mardan	GPGC Nowshera	A.V.P
4.	Muhammad Waris S/o Fazil Mabood, Mohallah Shah Dhand, Village & P/o Lund Ghar, Tehsil Takht Bha, District Mardan.	Computer Science	Disable Zone-II Mardan	GPGC Mardan	A.V.P
5.	Syed Hamid Ali Shah S/o Muhammad Shah, Village Sungram, Daggal, Buner.	Pak Study	Disable Zone-III Buner	GDC Daggal, Buner.	A.V.P
6.	Muhammad Siraj S/o Muhammad Zafar, Village Kotka, Tehsil Barikot, Swat.	Law	Disable Zone-III Swat	GDC Madyan.	A.V.P
7.	Insan Ullah S/o Mamat Ullah, P/o Serai Gambola, Village Kotka Mahmood Lakki Marwat.	Physics	Disable Zone-IV Lakki Marwat	GDC Dera Township No. 3, D.I. Khan.	A.V.P
8.	Abdul Khaliq S/o Rasool Jalal, Village & P/o Tabbi Khawa, Tehsil & District, Karak.	Biology	Merit-I Zone-IV Karak	GDC Takht-e-Nasrati, Karak	A.V.P
9.	Nazif Ullah Khan S/o Takim Khan, Department Micro Biology, Faculty Biological Sciences, Quaid-e-Azam University, Islamabad.	Biology	Zone-I N.W. Agency	Services placed at the disposal of Director Education (FATA)	
10.	Muhammad Naeem Khan S/o Muhammad Saqar Khan, Village Qila Anwar Mahal, PO Utranzal, Tehsil & District Charsadda.	Biology	Zone-2 Charsadda	GDC Garhi Kapoore, Mardan.	A.V.P
11.	Qasim Zaman S/o Haider Shah, Gul Muqam Zarf Khan Koroona, P.O. & Tehsil Dargal, District Malakand.	Biology	Zone-3 Malakand	GDC Daggal	A.V.P
12.	Asmat Ullah Khan S/o Rasool Badshah, C/O Rasool Badshah, SET, GHS No 2, Kohat City.	Biology	Zone-4 Karak	GPGC Madyan	A.V.P

Selection Officer (Departmental)  
Govt. of Khyber Pakhtunkhwa  
Higher Education, Archives & Libraries Department

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348.	Qaiser Jamal S/O Bacha Khan Mohallah Gulu Shah VIII & PO Sakhakot Dargal Malakand	Zoology	Zone-III Malakand	Services placed at the Disposal of Director Education (FATA), GGC, Karak.	A.V.P
349.	Asim Ullah Khan S/O Rasool Badshah C/O Rasool Badshah SET GMS No Kohat city	Zoology	Zone-IV Karak		A.V.P
350.	Ihsan Ullah S/O Rasheed Khan Vill Mianki Banda PO Inzer Banda Tah Lakht Nasrati dist Karak	Zoology	Zone-IV Karak	GDC Latamber, Karak.	A.V.P
351.	Muhammad Faiz Khan S/O Muhammad Afzal Khan Moh Choinian vill Sikandur Pur Haripur	Zoology	Zone-V Haripur	GDC Khanpur, Haripur.	A.V.P
352.	Khalid Mehmood S/O Ghulam Rasool Vill Bandi Sarara PO Chamiall Teh & Distt Abbottabad	Zoology	Zone-V Abbottabad	GDC Zarabi, Swabi.	A.V.P

**JUSTMENT:-**

Consequent upon the above, the following posting / transfer of lecturers is also in the best public interest. -

#	Name / Designation / present posting	Posted at	Remarks
	Attique uz Zaman, lecturer in Statistics, GDC Oghi, Mangshra.	GPGC Haripur.	Against vacant post
	Sajjad Ahmad, lecturer in Maths, GDC Samarbagh, Dir Lower.	GPGC Timergara, Dir Lower.	Against vacant post
	Ijaz Ahmad, lecturer in Economics, GDC Ahmadabad, Karak.	GPGC Kohat	Against vacant post
	Ikram Ullah, lecturer in Political Science, GDC Torakan, Malakand Agency.	GPGC Timergara, Dir Lower.	Against vacant post
	Dilawar Khan, lecturer in Chemistry, GDC Dara Adam Khel, FR Kohat.	GDC Hangu	Against vacant post
	Rashid Ahmad, lecturer in Pak Study, GDC Puran, Shangla.	GDC Matta, Swat.	Against vacant post
	Murad Ali, lecturer in Chemistry, GPGC Khar, Bajaur Agency.	GPGC Timergara, Dir Lower.	Against vacant post

The appointment of the above lecturers from S. No. 01 to 352 will be subject to terms and conditions:-

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- v. If they want to terminate their contract before expiry of the term, they will have to serve one month notice in advance failing which they will have to deposit one month pay in lieu of such notice in the Govt. Treasury.
- vi. They shall not make any request for transfer from the collage where they are posted. In case of such occurrence, their services shall stand terminated.
- vii. They shall join their post within 15-days of the issuance of this notification. The Director Higher Education, Khyber Pakhtunkhwa Peshawar, should furnish a certificate to the effect that the candidates have joined the post or otherwise after 15-days of the issuance of this notification.
- viii. They shall execute an agreement with the Government before taking over charge to be signed by the Director Higher Education Khyber Pakhtunkhwa, on behalf of the Government.
- ix. They shall not be entitled to any pension or gratuity for the service rendered by them on Adhoc basis.
- x. Charge report in duplicate should be submitted to all concerned.
- xi. Their service shall be terminated if they violate any provision of the terms & conditions specified in the Agreement Bond.

SECRETARY TO GOVT. OF  
KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

SECRETARY TO GOVT. OF

Copy of the above is forwarded to the:-

- 1- Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
- 2- Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
- 3- Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 4- Secretary to Governor, Khyber Pakhtunkhwa.
- 5- Accountant General Khyber Pakhtunkhwa Peshawar.
- 6- Director Higher Education Khyber Pakhtunkhwa Peshawar, with the request to circulate copies of the Agreement Bond to all Principals of the Government Colleges concerned immediately.
- 7- Director of Education (FATA) Khyber Pakhtunkhwa Warsak Road Peshawar.
- 8- Districts / Agency Accounts Officers, concerned.
- 9- Director Information for wide publicity through media.
- 10- Principals Government Colleges (Male) concerned.
- 11- Section Officer (FATA) Education Wing, Governor's Secretariat (FATA) Warsak Road Peshawar.
- 12- Deputy Director (IT), Planning Cell, Higher Education Department.
- 13- P.S. to Minister of Higher Education, Khyber Pakhtunkhwa Peshawar.
- 14- Officers concerned.

(BASHIR AHMAD)  
SECTION OFFICER (COLLEGES)

04/11/17

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Annex : 01

(HT)

(22)

W9



**CNPq-TWAS  
POSTGRADUATE FELLOWSHIP AWARD**

**twas**

To:  
Asmat Ullah Khan  
Village Malagi Banda Post Office Sabir Abad  
Tehsil and District Karak  
Pakistan. Post Code: 27200

05/12/2014

**SUBJECT: Award of 2014 CNPq-TWAS Postgraduate Fellowship  
FR number: 3240279918**

Dear Mr. Khan,

The National Council for Scientific and Technological Development (CNPq), Brazil, and TWAS, the academy of sciences for the developing world, are pleased to inform you that you have been awarded a CNPq-TWAS Postgraduate Fellowship to pursue a PhD research programme in Brazil.

The terms and conditions of the Fellowship are contained in this award letter.

It is recommended that you carefully read the award letter as it contains KEY INFORMATION on every aspect of your Fellowship, including visa, medical, stipend and travel arrangements.

**PURPOSE & DURATION**

- The Fellowship is intended for a full-time scientific research programme leading to the submission of a PhD thesis and award of a PhD degree. The Fellowship is tenable at the **Universidade Federal de Minas Gerais** under the supervision of the Director and **Dr. Erika Martins Braga**.
- The Fellowship must be taken up within one year of the date of the award letter or the Fellowship will become null and void.
- Please note that coursework will likely be carried out in Portuguese and the host institution will require your thesis to be submitted in Portuguese.
- The effective commencement date of this Postgraduate Fellowship **MUST** match the date indicated in the preliminary acceptance letter received from your host institution when applying. If it is indicated that you must start by the first academic semester you must take action in this regard as normally the first semester of the academic year in Brazil starts at the beginning of March and you will have to be in Brazil by March 2016. If the letter indicates that you must start by the second academic semester you must take action to be in Brazil at the end of July-beginning of August 2016 when the second semester starts. The exact date must be confirmed with the host institution. TWAS ([fellowships@twas.org](mailto:fellowships@twas.org)) and CNPq ([twas.ascin@cnpq.br](mailto:twas.ascin@cnpq.br)) must be informed of the effective date of commencement.
- From the effective date of commencement, you will have up to forty-eight (48) months to complete

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# Government of Khyber Pakhtunkhwa Khyber Pakhtunkhwa Public Service Commission

www.kppsc.gov.pk

Home | Jobs | Interview Results | Test Result | Schedule | PMS | Contacts

Search  
go:

Excellent  
 Very good

## Male Lecturer Biology (BPS-17) in Higher Education Department Adv no. 07/2010 Serial no. 32

Interviews for these posts were held. The following candidates have qualified interview and are to be recommended to the government for appointment subject to verification of their documents/domiciles etc by the Commission. If any discrepancies, found at any stage the selection/recommendation of the candidate will be cancelled accordingly.

S. No.	Name with Father's name	Division
1.	Azmat Ullah Khan S/O Saadul Badshah	Karachi
2.	Hari Ullah S/O Harir Alam	SW Agri/1
3.	Muhammad Iqbal S/O Nisar Muhammad	Mardan/2
4.	Majeed Khan S/O Amir Nisar Badshah	Dit /3
5.	Aamir Abbas S/O Jafar Hussain Khan	SI Khan /2
6.	Yaseen ul Rehman S/O Gulab Khan	Quetta Agri/1
7.	Muhammad Iqbal Khan S/O Lal Zana	Chitral/2
8.	Usman Ullah S/O Khaliq Khan	Dit/3
9.	Shahid Ali S/O Muhammad Yousaf	Abbottabad/5
10.	Muhammad Naveem Ullah Khan S/O Muhammad Nadeem Khan	Dera/2
11.	Waqar Khan S/O Aftab Khan	Abbottabad/5
12.	Muhammad Anwar S/O Saad Zaidi	FR Khan /1
13.	Muhammad Farooq S/O Saad Khan	Bannu/4
14.	Mirza Zahar S/O Fida Muhammad	Peshawar/2
15.	Ehsanul Haq S/O Habib Ahmad	Swat/3
16.	Abdul Khaliq S/O Naveed Jafar	Karachi
17.	Zeeshan Ahmad S/O Shafiq Ahmad	Swat /3

**Interview Tips**  
 General information regarding interviews.

**Application Form**  
 Download application form and fill according to the instructions given.

**Work Plan for Advertisements**  
 For the interview conducted against advertisement's serials.

**Your Comments**  
 You can inform us your views about working/performance of website.

**How to Apply from Abroad**  
 Information regarding how to apply from abroad.

**Personnel Management Services**  
 Job in personnel management services: A dynamic career.

**Downloads**  
 Download forms, notices or documents provided for candidate.

**PMS**  
 Information regarding PMS recruitment.

## Interview Results

2013-02-25 04:34:14

Female Lecturer Computer Science (BPS-17) in Higher Education Department Adv no. 02/2011 Serial no. 43.

2013-02-25 02:43:18

Male Lecturer Biology (BPS-17) in Higher Education Department Adv no. 07/2010 Serial no. 32

2013-02-25 00:55:54

Female Lecturer English (Disable Quota)(BPS-17) in Higher Education Department Adv no. 01/2012 Serial no. 24.

2013-02-25 00:53:25

Field Officer (BPS-17) in Zakat Usher, Social Welfare & Women Development Department Adv no. 04/2012 Serial no. 72.

2013-02-25 00:40:07

Female Lecturer Urdu (Disable Quota) in Higher Education Department Adv no. 01/2012 Serial no. 24.

2013-02-22 00:16:34

Male Lecturer Computer Science (BPS-17) in Higher Education Department Adv no. 02/2011 Serial no. 42

**FAIMUR HAIDER KHAN**  
ADVOCATE HIGH COURT

ANMUR HAIDER KHAN  
ADVOCATE HIGH COURT

no. 01/2012 Serial	no. 24	2013-02-25 00:53:25	Field Officer (BPS-17) in Zakat Usher, Social Welfare & Women Development Adv
no. 04/2012 Serial	no. 72	2013-02-25 00:40:07	Female Lecturer Urdu (Disable) Quota) in Higher Education Adv
no. 01/2012 Serial	no. 24	2013-02-22 00:16:34	Male Lecturer Computer Science (BPS-17) in Higher Education Adv
no. 02/2011 Serial	no. 42	2013-02-21 23:24:06	Social Case Worker (BPS-16) for Zakat Usher, Social Welfare & Women Development Adv
no. 04/2012 Serial	no. 74	2013-02-21 01:27:52	Male Assistant Director (BPS-17) in ST & IT Department Adv
no. 04/2012 Serial	no. 66	2013-02-13 04:02:42	District Specialist Anesthesia Surgery (BPS-18) in Health Department Adv
no. 01/2012 Serial	no. 16	2013-02-13 00:16:03	District Specialist Neuro Surgery (BPS-18) in Health Department Adv
no. 01/2012 Serial	no. 16	2013-02-13 00:16:03	District Specialist Neuro Surgery (BPS-18) in Health Department Adv

more!

How to Apply from abroad

1. Application Form

2. Wait List for Appointments

3. Your Documents

4. Interview Time

5. How to Apply from abroad

6. Interview Time

7. Wait List for Appointments

8. Your Documents

9. Interview Time

10. How to Apply from abroad

11. Interview Time

12. Wait List for Appointments

13. Your Documents

14. Interview Time

15. How to Apply from abroad

16. Interview Time

17. Wait List for Appointments

18. Your Documents

19. Interview Time

20. How to Apply from abroad

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Handwritten initials and signatures in the top right corner, including a circled '25' and a signature that appears to be 'K. Almeida'.

República Federativa do Brasil  
**UNIVERSIDADE FEDERAL DE MINAS GERAIS**

A Reitora da Universidade Federal de Minas Gerais, Professora Sandra Regina Coulart Almeida,  
no uso de suas atribuições, confere a

*Asmatullah Khan*

o grau de Doutor em Ciências,

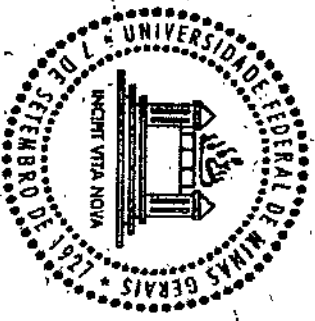
área de concentração Imunoparasitologia

e outorga-lhe o presente diploma, nos termos da legislação vigente.

Belo Horizonte, 12 de abril de 2019.

*Sandra Regina Coulart Almeida*  
Reitora

Diplomado





DIPLOMADO: ASMAT ULIAH KHAN

Filiação: RASOOL BAD SHAH  
ROSHAN BIBI

Data de Nascimento: 01 de setembro de 1987

Naturalidade: Karak, Paquistão

Nacionalidade: Paquistanesa

Documento de Identidade: SL4124571/Paquistão

MINISTÉRIO DA EDUCAÇÃO	
UNIVERSIDADE FEDERAL DE MINAS GERAIS	
Registro efetuado nos termos da Lei Nº 9.394/96 de 20/12/1998 – Artigo 48 – Parágrafo 1º	
Numero	6580
Proc. nº	2019/04.00615
Belo Horizonte	16 ABRIL 2019
	<i>Moreira</i>
	Liédia Moreira de Azeite
	Diretora da Divisão de Registro de Diplomas
	<i>Mara Lutz Cortes de Souza Pires</i>
	Diretora do Departamento de Registro e Conselho Acadêmico

(16)

(26)

Data da defesa: 28 de março de 2019.

Curso de Pós-Graduação em Parasitologia, nível Doutorado

Reconhecimento homologado pelo CNE (Portaria nº 656, publicada no D.O.U. de 23/5/2017, Seção 1, Págs. 14 a 84 e republicada no D.O.U. de 27/7/2017, Seção 1, Págs. 20 a 106).

*ella*

Selador de Expedição de Diplomas/PRPC

To  
②  
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D  
Anwar  
The Director, Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

**Subject: Issuance of No Objection Certificate (NOC) through Proper Channel**

Respected Sir,

It is stated that I am working as a lecturer in Govt Post Graduate College Karak since 04 november 2010. I have done M.Phil in the subject of Zoology from Kohat University of Science & Technology Kohat and want to enhance my qualification. TWAS\_CNPq is accepting online application form for Ph.D fellowship for the academic year 2015 under the leadership of late Nobel laureate Dr Abdus Salam of Pakistan and the United Nation Educational Scientific and Cultural Organization (UNESCO) for which I offer myself as a candidate. For the submission of application form it is obligatory to get acceptance letter from the Institution abroad. I have received the acceptance letter (copy attached).

It is therefore requested to provide me "No Objection Certificate" before the closing date 28/07/2014. I shall be very thankful to you for this act of kindness.

*Asmat Ullah Khan*  
Yours Sincerely,

Asmat Ullah Khan  
Lecturer in Biology

GPGC Karak

Dated. 22-07-2014

④  
To

The Director,  
Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

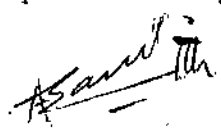
⑤  
②B

**Subject: Issuance of No Objection Certificate (NOC) through Proper Channel**

Respected Sir,

With due respect it is stated that I had applied for issuance of "No Objection Certificate" through proper channel vide letter no 1029 dated 22/07/2014 (copy attached) for TWAS\_CNPq Ph.D fellowship for the academic year 2015 under the leadership of late Nobel laureate Dr. Abdus Salam of Pakistan and the United Nation Educational Scientific and Cultural Organization (UNESCO), but I have got no response from your side. As far as I know the above mentioned scholarship is likely to be awarded to me. It is therefore once again requested to grant me "No Objection Certificate". I shall be very thankful to you for this act of kindness.

With complement and Regard

  
Yours Sincerely,

Asmat Ullah Khan  
Lecturer in Biology

GPGC Karak

Dated. 29-12-2014

10  
The Director, Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

Through Proper Channel

**Subject: Issuance of No Objection Certificate (NOC) and Study Leave in Respect of Asmat Ullah Khan Lecturer in Biology GPGC Karak**

Respected Sir,

It is stated that I am working as a lecturer in Government Post Graduate College Karak since 04 November 2010. I have applied for issuance of NOC regarding postgraduate studies abroad vide letter No: 1029 dated 22-07-2014 but I received no response. Consequently, I submitted an application as a reminder for the said purpose by letter No: 01 dated 01-01-2015 but to no avail. (photocopies attached as Annex I and II).

- It has been once again requested that TWAS\_Cnpq fellowship for pursuing postgraduate research studies with University of Federal de Minas Gerias Brazil for the academic session 2015 has been awarded to me with full confirmation (copy attached as Annex III). The semester is going to start in near future. I therefore stand in need of NOC and study leave with all benefits.

You are earnestly requested to grant me NOC and study leave for the said purpose (study leave Performa attached as Annex IV).

Moreover, you are further requested to consider all my previous applications for NOC for PhD studies null and void please.

With complement and Regards,

Asmat Ullah Khan

Lecturer in Biology

GPGC Karak

Dated: 31-03-2015

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APPLICATION FOR LEAVE

Notes:- Item 1 to 9 must be filled in by all applicants. Item 12 applies only in the case of Government servants of B.P.S. 16 and above.

P.No-55672B

- 1. Name of applicant. Asmat Ullah Khan.
- 2. Leave Rules applicable. FR-84.
- 3. Post held. - Lecturer in Biology at GPGC Karak
- 4. Department or Office. HED-DEPH KPK Peshawar GPGC Karak
- 5. Pay. @ - 19500/-month.
- 6. House Rent Allowance/Conveyance Allowance or other compulsory allowance drawn in the present post. - 24654/mo
- 7. (a) Nature on leave applied for. Study leave for PhD.
- (b) Period of leave in days. 1401 days
- (c) Date of commencement. 01 May 2015 - 28 Feb - 2019.
- 8. Particular Rule/Rules under which leave is admissible. FR-84.
- 9. (a) Date of return from last leave. - NIL
- (b) Nature of leave. NIL
- (c) Period of leave in days. NIL

Date. 31-03-2015

Signature of applicant.

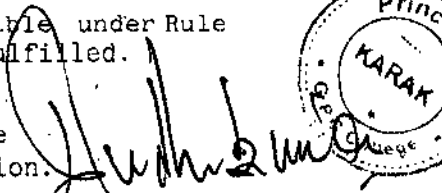
*[Handwritten signature]*

10. Remarks recommendation of the Controlling Officer. No 660 dated 31-03-2015 forwarded to DAO Karak for admissibility Report please.

11. Certified that leave applied for is admissible under Rule FR-84..... and necessary conditions are fulfilled.

Date 31-03-2015

Signature Designation.



12. Report of Audit Officer = Study leave is admissible for the maximum period of two years - subject to the completion of 05 years service under the Revised Rules 1988.

Date .....

Signature Designation.

13. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to the same post carrying the compensatory being drawn by him.

Date .....

Signature Designation.

*[Handwritten signature]*  
#DAO 37/3

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### APPLICATION FOR LEAVE

Notes: - Item 1 to 9 must be filled in by all applicants. Item 12 applies only in the case of Government servants of Grade 16 and above.

1. Name of applicant. *Zulqarnain*
2. Leave Rules applicable *FR 84*
3. Post held. *Lecturer in Botany at G.D.C Sabirabad Head*
4. Department or office *Higher Education N.W.F.P Peshawar.*
5. Pay. *R 11330/- PM*
6. House Rent Allowance/conveyance allowance or other compensatory allowances drawn in present post *2955/-*
7. (a) Nature of leave applied for. *Study Leave for Ph.D.*  
 (b) Period of leave in days. *1460 days*  
 (c) Date of commencement. *01 March 2010 to 01 March 2014.*
8. Particular Rule/Rules under which leave is admissible. *FR 84*
9. (a) Date of return from last leave. *01 March 2014*  
 (b) Nature of leave. *Study leave for Ph.D*  
 (c) Period of leave in days. *1460 days*

Signature of applicant.

Date. *7/1/2010*

10. Remarks and recommendation of the Controlling Officer. *Principal G.D.C. Sabirabad*  
*Recommended and recommended for favourable consideration.*
11. Certified that leave applied for is admissible under Rule FR 84 and necessary conditions are fulfilled.

No. *1374*

Dated. *7/01/2010*

*[Signature]*  
Principal  
Govt Degree College  
Sabir Abad (Karak)

12. Report of Audio Officer. *His request for leave is approved for study leave or*  
*consider with under F.R 84, that is for study leave or*  
*extra ordinary leave without pay.*

Signature  
Designation

13. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to these posts carrying *compensatory* allowances being drawn by him.

Signature  
Designation

Dated.



**GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT**

Dated Peshawar the 25.07.2016.

**NOTIFICATION**

*3015-16*  
No. SO (C-IDHED)/12-3/2014. WHEREAS Mr. Asmatullah, lecturer in Biology (BS-17), Govt. Post Graduate College, Karak is absent from duties since 01-05-2015.

2. AND WHEREAS absence notices were issued to him on his home address as well as published in leading newspapers directing him to resume duty failing which ex-parte action under Khyber Pakhtunkhwa Efficiency & Discipline Rules, 2011 would be taken against him.

3. AND WHEREAS the accused lecturer did not report for duty in response to the absence notices.

4. NOW THEREFORE, The Competent Authority, in exercise of powers conferred upon him under the Khyber Pakhtunkhwa Efficiency & Discipline Rules, 2011, is pleased to impose upon him penalty of removal from service with immediate effect. The absence period w.e.f 01-05-2015 till imposition of penalty shall be treated as unauthorized absence from duty (without leave).

*Taimur Haider Khan*  
TAIMUR HAIDER KHAN  
ADVOCATE HIGH COURT

SECRETARY TO GOVT. OF  
KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

Copy for information forwarded to the:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal Govt. Post Graduate College, Karak.
3. District Account Officer Karak.
4. Officer concerned.

*Rachana Sabar*  
SECTION OFFICER (COLLEGES-II)



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DE  
Ankur



Name	Gender	Age	ID	Date
Asmatullah Khan	Male		10	6/12/2019

PLAIN MRI LUMBAR SPINE

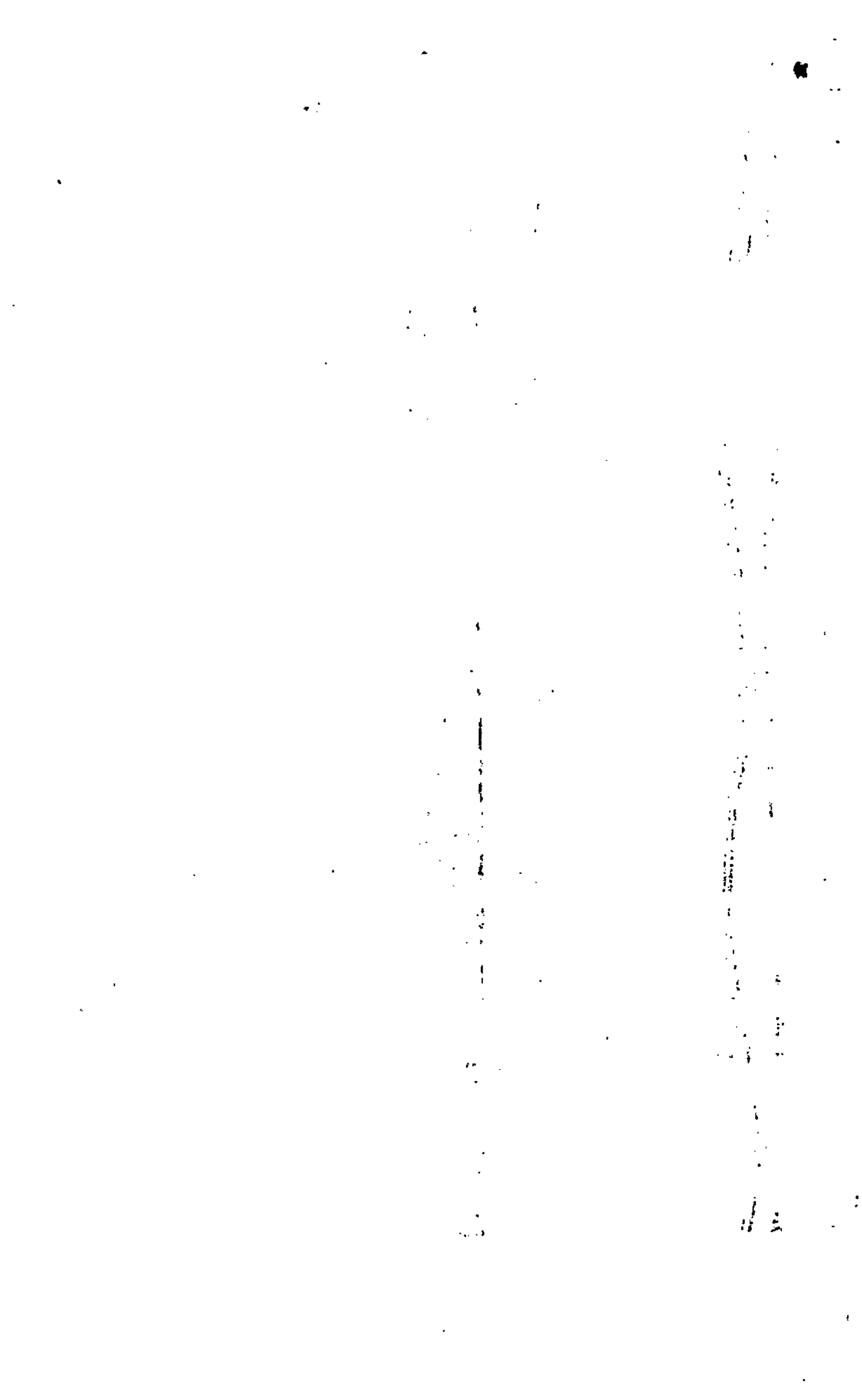
FINDINGS

- > Spinal cord: Spinal cord appears normal with no evidence of any area of abnormal signal intensity
- > Vertebrae:
  1. Normal alignment of vertebral bodies and posterior elements of spine in the scanned area
  2. Straightening of lumbar spine is noted indicating paravertebral myospasm.
- = Intervertebral Discs
  1. L1-L2: Intervertebral disc appear normal. No disc protrusion or herniation is seen in the spinal canal. Lateral recesses appear normal.
  2. L2-L3: Intervertebral disc appear normal. No disc protrusion or herniation is seen in the spinal canal. Lateral recesses appear normal.
  3. L3-L4: Intervertebral disc appear normal. No disc protrusion or herniation is seen in the spinal canal. Lateral recesses appear normal.
  4. L4-L5: Disc dehydration is seen with preserved height. Posterior and lateral annular bulge causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen R>L.
  5. L5-S1: Disc dehydration is seen with preserved height. Posterior and lateral annular bulge causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen R>L.

CONCLUSION

- > Mild posterior central and para-central annular bulge at L5-S1 IV disc level causing indentation of thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen L>R. Annular bulge is approx 0.53 cm and spinal dimensions are 1.40 cm in AP and 1.65 cm in TR.
- > Disc dehydration with preserved height at L4-L5. Posterior and lateral annular bulge causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen R>L. Annular bulge is approx 0.56 cm and spinal dimensions are 1.47 cm in AP and 1.70 cm in TR.
- > MR myelogram shows subtle intervertebral indentations on CSF column at lower lumbar spinal region.
- > Paravertebral myospasm around lumbar spine.

Zishan Hader  
 M.D. in Radiology  
 RCR-UK





ITTEFAQ

OPEN MRI

3D CT SCAN

Name:	Gender	Age	ID	Date
ASMATULLAH KHAN	male	yrs	04	12 12 2020

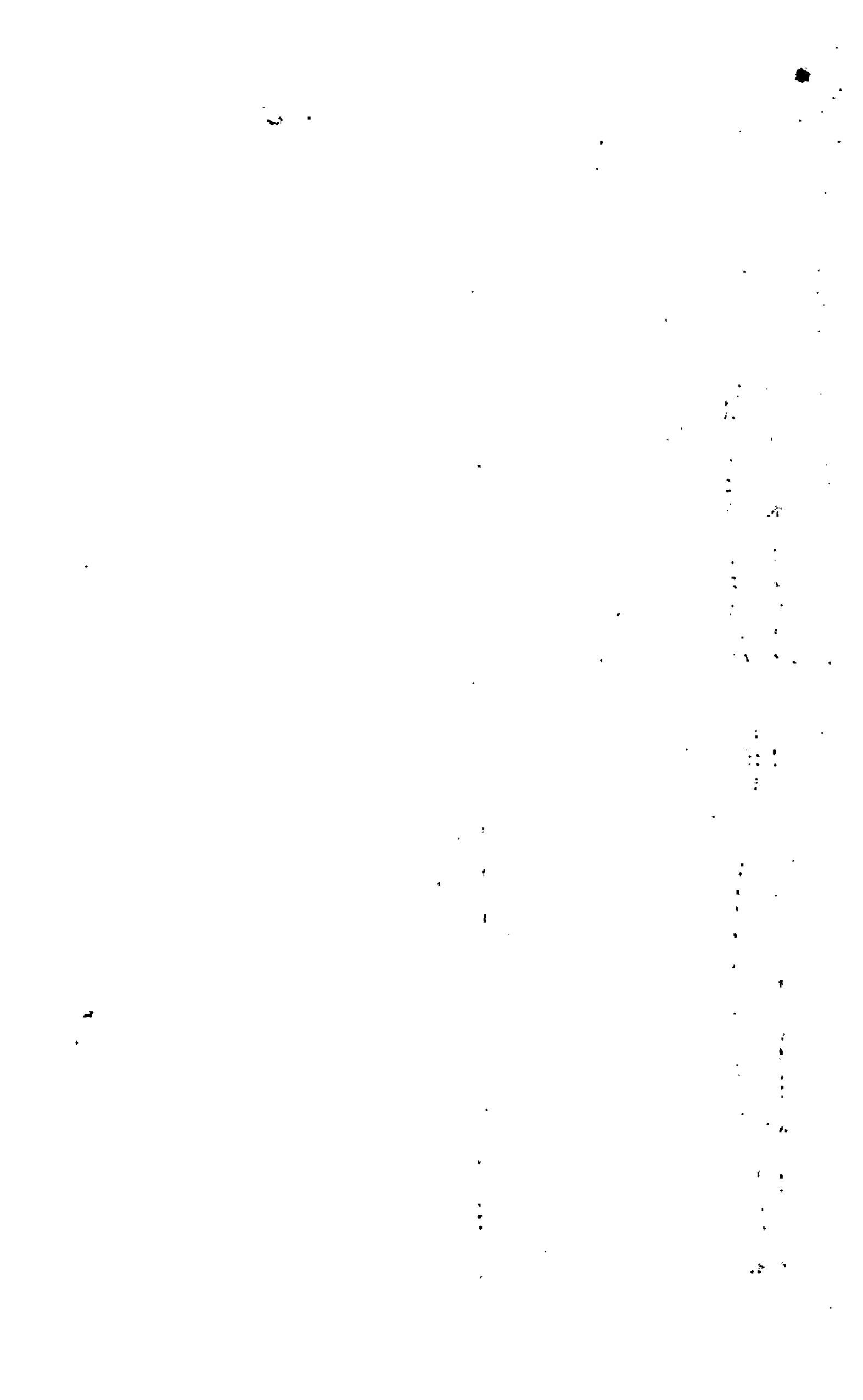
PLAIN MRI LUMBAR SPINE

CLINICAL DATA Backache.

FINDINGS

- > **Spinal cord:** Spinal cord appears normal with no evidence of any area of abnormal signal intensity
- **Vertebrae**
  1. Normal appearance of vertebral bodies and posterior elements of spine in the scanned area
  2. Straightening of lumbar spine is noted indicating paravertebral myospasm.
- = **Intervertebral Discs**
  1. **LV1-LV2:** Inter-vertebral disc appear normal. No disc protrusion or herniation is seen in the spinal canal. Lateral recesses appear normal..
  2. **LV2-LV3:** Inter-vertebral disc appear normal. No disc protrusion or herniation is seen in the spinal canal. Lateral recesses appear normal..
  3. **LV3-LV4:** Inter-vertebral disc appear normal. No disc protrusion or herniation is seen in the spinal canal. Lateral recesses appear normal
  4. **LV4-LV5:** Disc dehydration is seen with preserved height. Posterior and lateral annular bulge causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen R>L.
  5. **LV5-SV1:** Disc dehydration is seen with preserved height. Posterior and lateral annular bulge causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen R>L.
- > Ligamenta flava and the extra-dural fat appear normal in thickness.
- > No evidence of any extra-dural / intra-dural mass. No para-vertebral mass seen.
- > Pre-vertebral soft tissues appear normal.
- > No pre-vertebral enlarged lymph nodes are seen.

P-7-0



**CONCLUSION**

- Mild posterior central and para-central annular bulge at LV5-SV1 IV disc level causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen L>R. Annular bulge is approx 0.53 cm and spinal dimensions are 1.40 cm in AP and 1.65 cm in TR.
- Disc dehydration with preserved height at LV4-LV5. Posterior and lateral annular bulge causing indentation on thecal sac and mild narrowing of both lateral recesses with subtle abutment on exiting and transiting nerve roots seen R>L. Annular bulge is approx 0.56 cm and spinal dimensions are 1.47 cm in AP and 1.70 cm in TR.
- MR myelogram shows subtle anterolateral indentations on CSF column at lower Lumbar spine region.
- Paravertebral myospasm around lumbar spine

Dr Zishan Haider  
Fellow Diagnostic Radiology Pak  
Fellow RCR-UK

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ناصر آرٹھوپیدک اسپتال ٹرا اسٹنٹر

آرٹھوپیدک سرجن  
ڈاکٹر گل نائل ناصر

Dr. Lalq Gul Nasir

MBBS MD (GD) MS (Orth) UK  
FRCP (UK)  
FC (Orthopaedic Surgery)  
FCM (Mumbai)  
Life Time Member of Pvc Orthopaedic Association Pakistan

پہلی بار کراچی ۱۹۸۲ء  
دوسری بار لاہور ۱۹۸۳ء  
تیسری بار ممبئی ۱۹۸۴ء

Pt Name: A S M F 41124 (Nasir) Sex: M Date: 30/6/21

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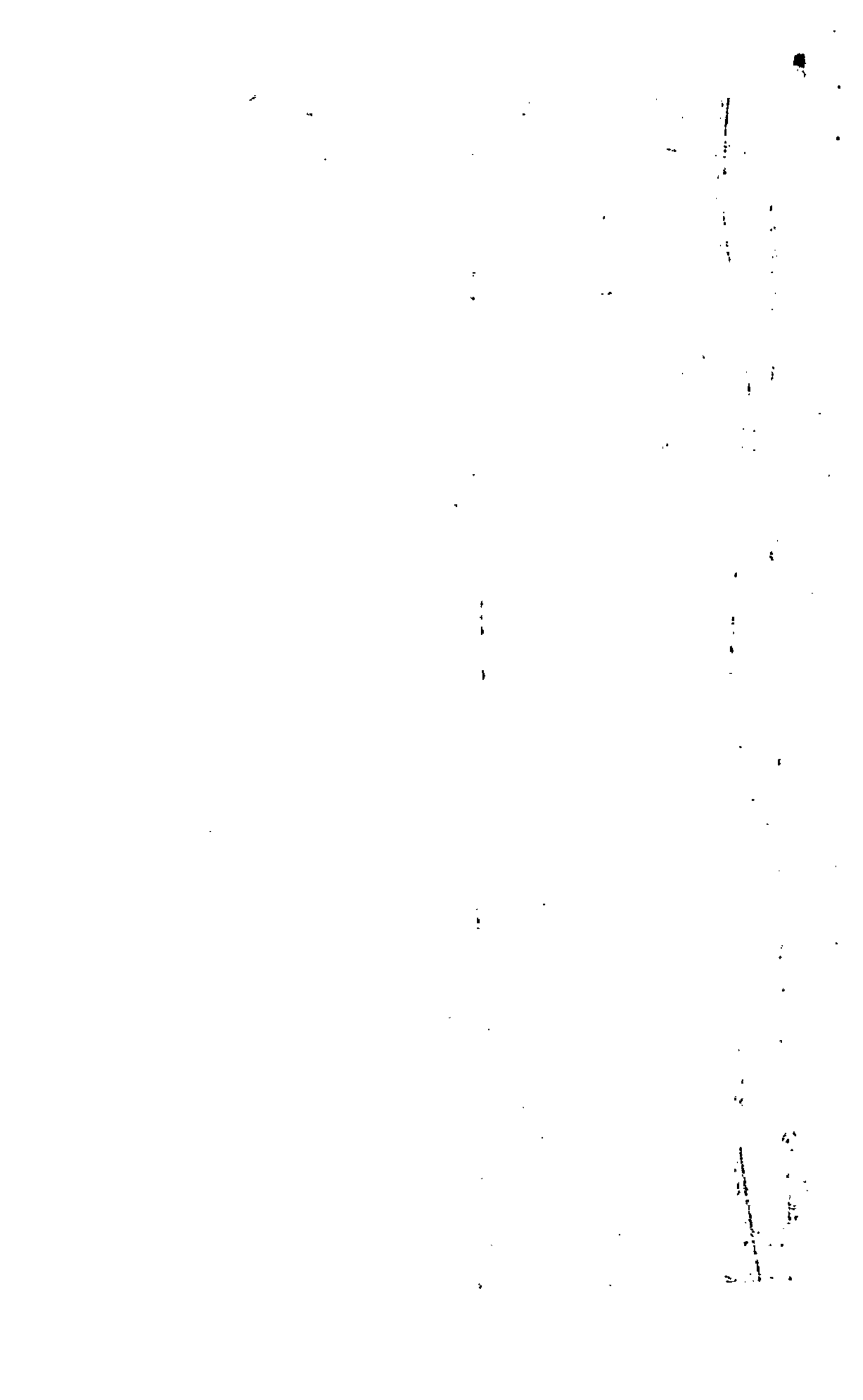
Handwritten notes and signatures in Urdu, including names like 'Dr. Gulzar', 'Dr. Farhat', and 'Dr. Raza'. There are also some illegible scribbles and signatures.

Invalid for Court Purpose

PMDC No 13514-N

0333-3132048 ڈی ایچ او ہسپتال اسلام آباد







ناصر آرٹھوپڈیک اینڈ ٹراٹمنٹسٹر

آرٹھوپڈیک سرجن  
ڈاکٹر لائق گل ناصر

**Dr. Lajq Gul Nasir**

M.B.B.S. M.D. (CO.) M.S. (Ortho.)  
F.R.C.S. (Ed.)  
F.R.C.S. (Ortho.)  
F.R.C.S. (Gen.)  
F.R.C.S. (Plast.)  
F.R.C.S. (Surg.)  
F.R.C.S. (Trauma)



گولڈن ہسپتال، اسلام آباد  
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KZL (10/11/12)

Pt Name: Ahmed ulley Age: 10 Sex: ♂ Date: 08/08/20

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(Signature)  
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Invalid for Court Purpose PMDC No 13514-N

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آرٹھوپیدک سرجن  
ڈاکٹر نایق گل ناصر

Dr. Laiq Gul Nasir

MC, MB, MS, DNB, DGO, DFC, FRCGS (UK), FRCR (UK), FRCR (UK), FRCR (UK), FRCR (UK)

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9/2019

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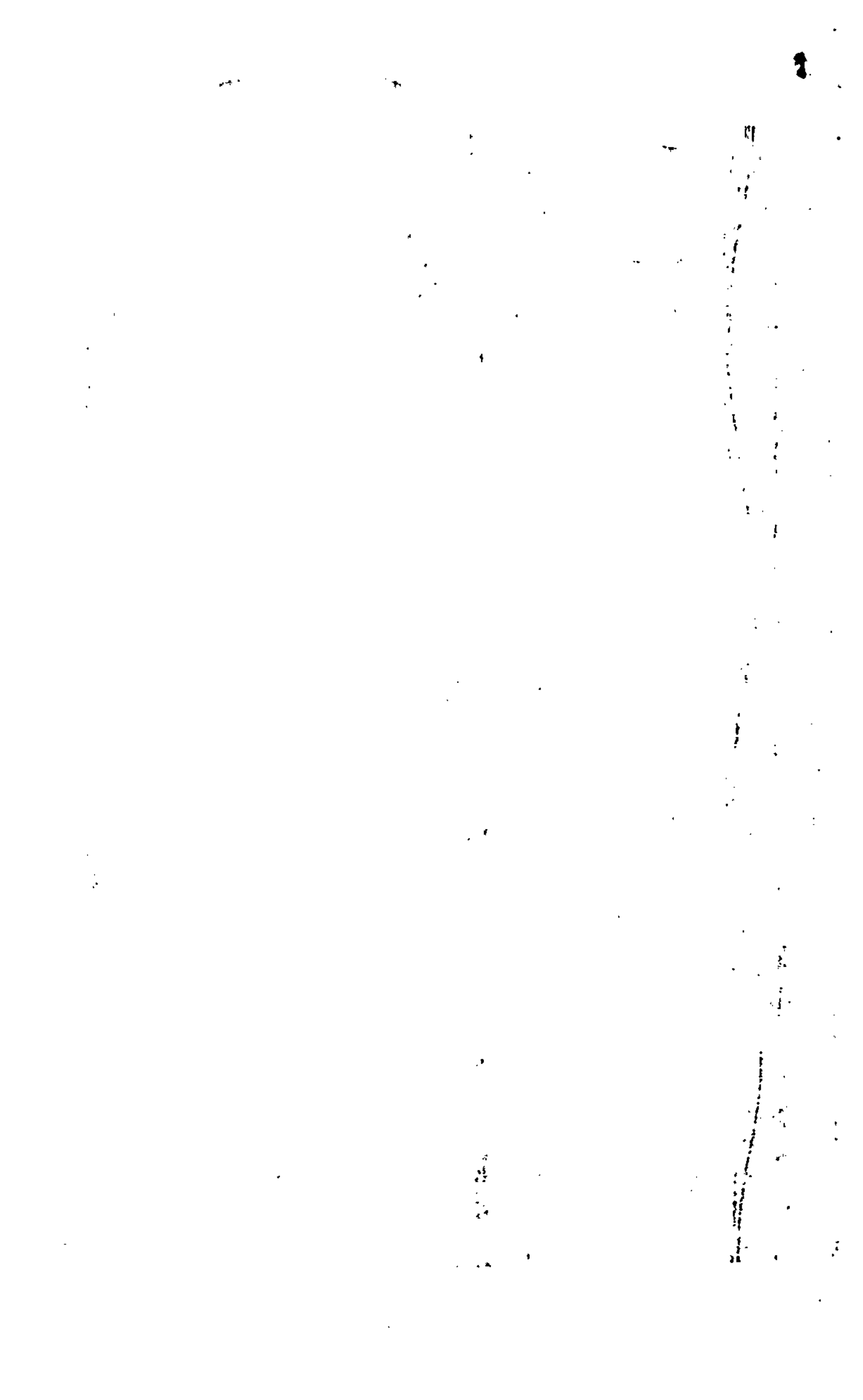
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Handwritten notes in Urdu, including "پیشاب کا کوشت، پوالا، رات" (Pishab ka kooشت, puala, rat).

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ناصر آرٹھوپیدیک اینڈ ڈراما سائنسز

آرٹھوپیدک سرجن  
ڈاکٹر لائق گل ناصر

**Dr. Laiq Gul Nasir**

M.D.S. (Ortho), M.B. (Ortho), M.S. (Ortho)  
F.C.S. (Ortho)  
F.C.S. (Hk) (Ortho)  
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F.C.S. (Hk) (Ortho)

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Pt Name Asim-ul-Haq Khan Age 65 Sex M Date 05/12/2019

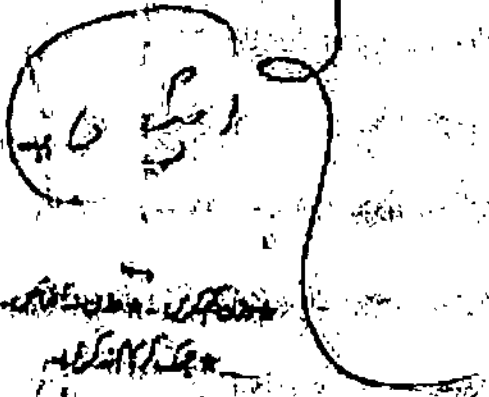
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آرٹھوپیڈک سرجن  
ڈاکٹر لائق گل ناصر

**Dr. Laliq Gul Nasir**

MBBS, MD (Ortho), M.S. (Ortho) (UK)  
FRCR (UK)  
FRCR (UK)  
FRCR (UK)  
FRCR (UK)  
FRCR (UK)



پروفیشنل رجسٹریشن  
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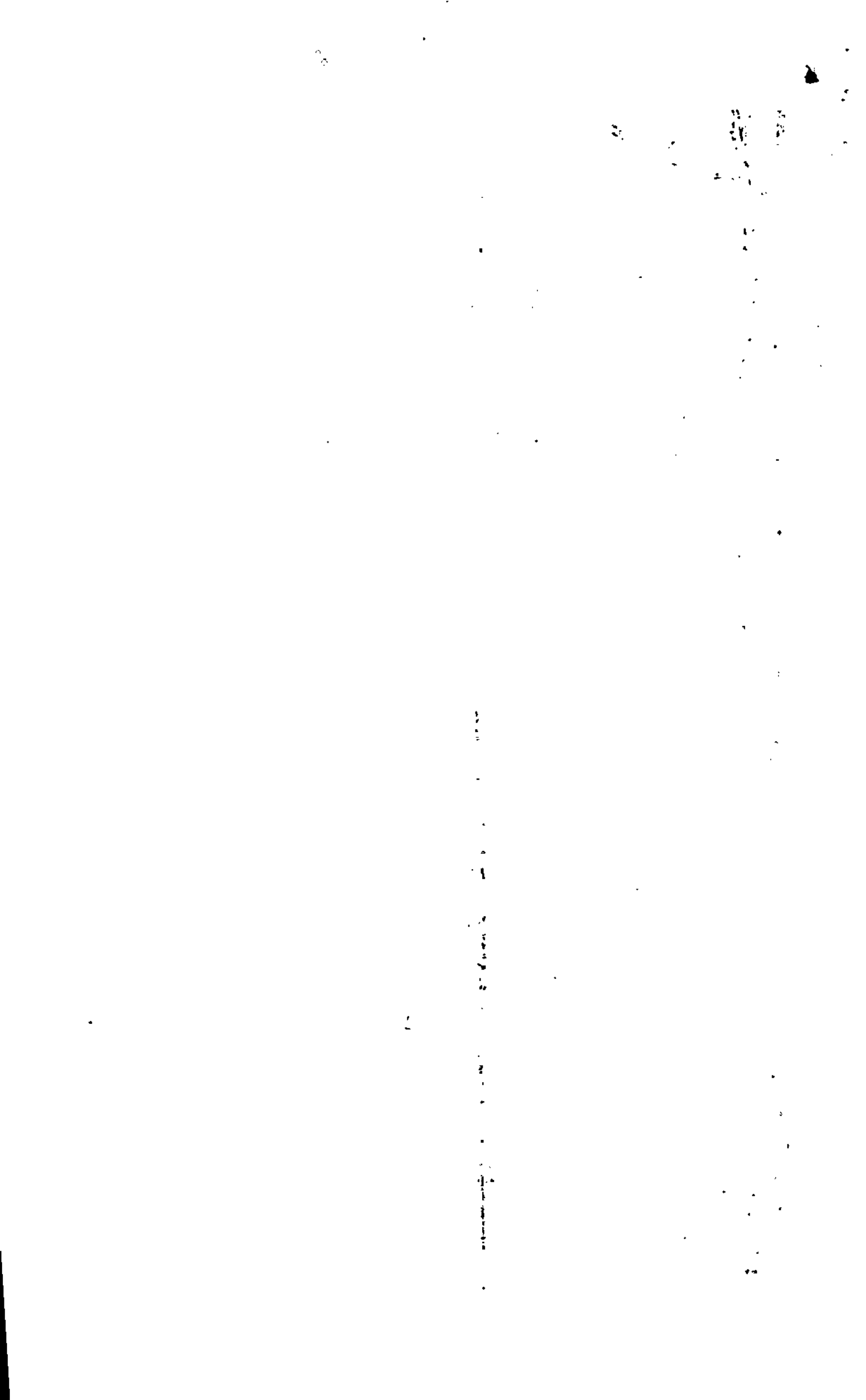
Handwritten notes in Urdu in the middle section, possibly related to the patient's condition or treatment.

Handwritten notes in Urdu on the right side of the page, including medical terms and patient information.

Invalid for Court Purpose

PMDC No. 13514-N

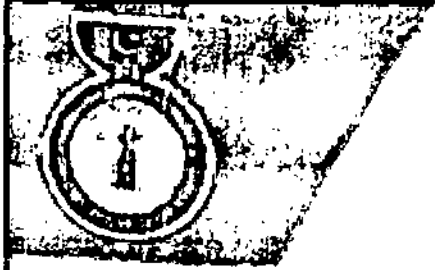
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ناصر آرٹھوپیدک ایجنڈ ٹرانا سنٹر

ڈاکٹر لائق گل ناصر  
ڈیپارٹمنٹ آف آرٹھوپیدک سرجنری

**Dr. Lalq Gul Nasir**

M.B.B.S., M.D. (P), M.S. (Ortho), KZ  
F.R.C.P. (Ortho)  
F.C.I.S. (Ortho)  
F.C.S. (Ortho)  
F.C.S. (Gen. Surg.)  
F.C.S. (Gen. Surg.)  
F.C.S. (Gen. Surg.)

ڈیپارٹمنٹ آف آرٹھوپیدک سرجنری  
ہسپتال گلبرگ، ٹرانا  
کے ایم ایف آرٹھوپیدک سرجنری

Pt. Name: Asmat Ullah Khan Age: 45 Sex: M Date: 3/3/2020

*Handwritten notes in Urdu:*

2 days (19/2/2020)  
 Backache  
 to walking  
 (Rt) Very  
 painful

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BMDC No 13514

0333-3132046 DHQ

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Answer

No 1099

Dated Karak the 22-7-2014

From:

The Principal,  
Govt. Post Graduate College  
Karak.

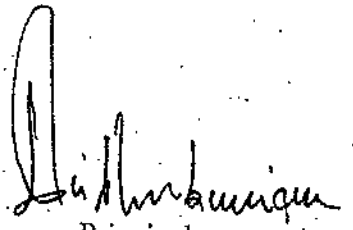
To,

The Director Higher Education,  
Khyber Pakhtunkhwa Peshawar.

**Subject: Issuance of No Objection Certificate (NOC) through Proper Channel**

Memo:

Enclosed please find herewith NOC application in respect of Asmat Ullah Khan, Lecturer in Biology GPGC Karak for further necessary action.

  
Principal,

Govt Post Graduate College  
Karak

  
TAIMUR HAIDER KHAN  
ADVOCATE HIGH COURT

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# GOVERNMENT POST GRADUATE COLLEGE KARAK



No. 01 /NOC  
Dated Karak the 01-01-2015

To  
The Director Higher Education  
Khyber Pakhtunkhwa Peshawar.

Subject: ISSUANCE OF NOC THROUGH PROPER CHANNEL

Memo  
Enclosed please find herewith NOC application in respect of Mr. Asmat  
Ullah Khan Lecturer in Biology for further necessary action.

Principal  
Govt Post Graduate College  
Karak

TAIMUR HAIDER KHAN  
ADVOCATE HIGH COURT

No

661-

Dated Karak the 31-03 - 2015

From:

The Principal,

Govt. Post Graduate College

Karak.

To,

The Director Higher Education,

Khyber Pakhtunkhwa Peshawar.

**Subject: Issuance of No Objection Certificate (NOC) and Study Leave through Proper Channel**

Memo:

Enclosed please find herewith NOC and study leave application in respect of Asmat Ullah Khan, Lecturer in Biology GPGC Karak for further necessary action.

Principal,

Govt Post Graduate College

TAIMUR HAIDER KHAN  
ADVOCATE HIGH COURT

7

46

OFFICE OF THE PRINCIPAL

GOVT;POSTGRADUATE COLLEGE KARAK.

NO 807 /

Dated Karak the 29-4/2015

To.

The Director

Higher Education Khyber Pakhtun Khwa Peshawar

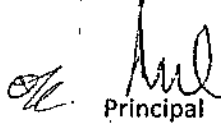
Subject;

ISSUANCE OF NO OBJECTION CERTIFICATE(NOC) AND STUDY LEAVE THROUGH. PROPER CHANNEL.

Memo;

An application for NOC/study leave(Copy attached) in respect of Mr. Asmatullah Lecturer in Biology of this college was submitted vide this office No.661 date 31.3.2015.

This office may please be informed about to the decision taken.



Principal

Govt; Postgraduatecollege  
Karak.



**FAIMUR HAIDER KHAN**  
ADVOCATE HIGH COURT

To,

The Worthy Director,  
Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

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Amerat

**APPEAL AGAINST THE IMPUGNED UNJUSTIFIABLE ORDER DATED 2.07.2016, WHEREBY THE UNDERSIGNED HAS BEEN REMOVED FROM SERVICE ON THE BASIS OF UNAUTHORIZED ABSENCE FROM DUTY. DESPITE THE FACT THE WORTHY PRINCIPAL GPGC, KARAK VIDE LETTER NO.1029 DATED 22.07.2014, LETTER NO.01/NOC DATED 01.01.2015 VIDE LETTER NO.661 DATED 31.03.2015 AND LETTER NO.807 DATED 29.04.2015 DO CORRESPOND TO YOUR GOOD-SELF FOR GETTING STUDY LEAVE THROUGH PROPER CHANNEL FOR THE UNDERSIGNED.**

*Received  
30-6-2016*

**Respected Sir,**

Humbly submitting that, undersigned hold "A" Grade throughout academic year till Ph.D Degree. In the year 2013, the undersigned has topped the whole province and has been appointed as Lecturer (Biology) through KP Public Service Commission, in Govt. Post Graduate College, Karak.

Since the inception of appointment, the undersigned hold good, soft by Sobex Character having great respect for seniors and colleagues. Ever tried level best to keep the moral of the department High and was having unblemished service career.

Infact for getting Ph.D Scholarship the undersigned has properly applied and the worthy Principal assured for the needful being cleared from his good-self aforementioned letters for your good-self in favour of undersigned.

When undersigned came back to Pakistan, after successfully accomplishing Ph.D, the undersigned was

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shocked and astonished to know about the mentioned removal order from service.

So, much so, due to extreme tension, the undersigned was badly injured due to motorbike accident resultantly for about two years the undersigned was on bed treatment being having severe backbone problem. (All the medical documents, X-Rays, tests are attached herewith)

Venerable Sir, the absence from duty was not intentional but due to studying of higher studies and the delay in the instant appeal is also not intentional but due to dilapidated health condition.

Sir, I am overage, could not apply anywhere and if my instant appeal is not accepted, my academic career as well as future will be spoiled.

It is, therefore, very humbly requesting that on the basis of aforesaid statements, the undersigned may kindly be reinstated into service with all back benefits.

*Asmat Ullah Khan*

Your's Truly  
Asmat Ullah Khan  
Lecturer in Biology  
GPGC Karak

Dated: 28.06.2021

Copy forwarded to:

- The Worthy Principal GPGC, Karak.



36

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POWER OF ATTORNEY

Ref.# \_\_\_\_\_

IN THE COURT OF

Leonard Khyber Pakhtunkhwa Service Tribunal

Date: Peshawar

Asmat ullah Khan

(Petitioner)  
(Appellant)  
(Plaintiff)

Versus

Government of KP through Secretary (Defendant)  
Higher Education, Peshawar (Respondent)

I/We, the undersigned do hereby nominate and appoint

**TAIMUR HAIDER KHAN**  
**ADVOCATE, HIGH COURT**

On behalf of Appellate/Petitioner

Know all to whom these presents shall come that I/We the undersigned appoint, the above named Advocate in District Peshawar in the above mentioned case to do all the following acts, deeds and things.

1. To act, appear and plead in the above mentioned case in this court or any other court in which same may be tried or heard in the first instance or in appeal or review or revision or application or at any other stage of its progress until its final decision.
2. To present pleadings, appeals, case objection or petitioners for execution, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution/defence of the said case at all stages.
3. To withdraw or compromise the said case or submit to arbitration any difference or disputes that shall arise touching or any manner relating to said cause.
4. To employee, authorize any other legal practitioner to assist or exercise the power in authority hereby conferred on the advocate whenever he may think to do so.

AND I/We, hereby agree to ratify whatever the advocate or his substitute shall do in this behalf and I/We hereby agree not to hold the advocate or his substitute responsible for the result of the case in consequences of his absence from the Court when the said case is called up for hearing.

AND I/We in case of expiry of the said advocate any full fee or part payment thereof, will not claim in any manner whatsoever, or in case of disengagement of the said advocate will not make any claim regarding fee.

*Accepted by Taimur Haider Khan*

**TAIMUR HAIDER KHAN**  
**ADVOCATE HIGH COURT**

Dated: 16-10-21

Accepted subject of the terms  
And full payment of Settled Fee

(Signature/thumb impression of the Executant)

Asmat ullah Khan s/o Rasool Bacha R/o

village Malagay Bonela P/o Sabir Abad

District Karak

**Taimur Haider Khan**  
**Advocate, High Court**

*[Handwritten signature]*



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

**Service Appeal No7713/2021**

Mr. Asmat Ullah..... Appellant

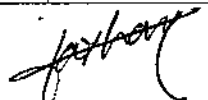
**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Secretary, Higher Education  
& others.....

Respondents

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Respondent

1  
B  
S  
S

**BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL**  
**PESHAWAR**

S.A # 7713/2021

Mr. Asmat Ullah.....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Secretary Higher Education Peshawar  
& others.....Respondents

**SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 to 3**

**Respectfully Sheweth:-**

**Preliminary Objections:-**

1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant is trying to conceal material facts.
4. That the appellant is estopped by his own conduct to file the instant service appeal.
5. That the instant Service Appeal is badly time-barred.
6. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
7. That the instant Service Appeal is hit by doctrine of laches.
8. That the instant Service Appeal is barred by Law.

**Reply on Facts:-**

1. Pertains to record.
2. Correct to the extent that the appellant was appointed as Lecturer in Higher Education department vide Notification dated: 28.06.2013 (**Annex-A**), rest of the para pertains to record.
3. Pertains to record.
4. Incorrect. The appellant is trying to mislead the Hon'ble Tribunal. The appellant was not entitled for study leave and as a civil servant, he was required to wait for the permission/sanction of his leave but he proceeded abroad without waiting for the decision of Competent Authority, rest of the para is subject to proof as he has not attached any documentary proof.
5. The appellant was appointed in Higher Education department on 28.06.2013 and as per rules, he was not entitled for study leave as for study leave minimum 5 years service is required (**Annex-B**). The appellant submitted application for NOC through Principal, Govt; Postgraduate College, Karak vide letter dated: 01.03.2014 (**Annex-C**) to the office of respondent No. 2 on 05.03.2014. The office

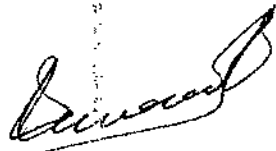
of respondent No. 2 raised certain observations vide letter dated: 30.04.2014 (**Annex-D**) when the observations were removed application of the appellant was forwarded to the office of respondent No. 1 vide letter dated: 08.08.2014 (**Annex-E**) vide application dated: 31.03.2015 submitted through Principal, the appellant applied for NOC and study leave (**Annex-F**) wherein he wrote a note that his all previous applications for NOC for PH.D studies may be considered as null and void. Vide letter dated: 17.04.2015 the appellant was informed via his Principal that his service is less than 5 years, hence study leave is not admissible to him (**Annex-G**). But the appellant without waiting for the permission/sanction of the Competent Authority proceeded abroad, hence, did misconduct.

6. Incorrect. The concerned Principal called explanation dated: 19.05.2015 & 05.06.2016 (**Annex-H**) and finally reported the issue to the office of respondent No. 2. Vide letter dated: 10.10.2015 (**Annex-I**). Absence Notice dated: 24.11.2015 was issued on his home address but the appellant did not report for duty (**Annex-J**). The absence Notice was also published in 02 leading newspapers i.e daily News and daily Mashriq on 29.02.2016 (**Annex-K**). Wherein the appellant was directed to report for duty within 15 days but the appellant failed to do so. As a result, the competent authority after the fulfilment of all codal formalities vide Notification dated: 25.07.2016, imposed upon the appellant penalty of removal from service. (**Annex-L**)
7. Incorrect. Misleading, as already explained in para 05 and 06.
8. Incorrect. Already explained above.
9. The appellant being civil servant was bound to wait for the decision of competent authority but he left abroad without permission/sanction of competent authority.
10. Incorrect. As already explained in para 04 and 05 above.
11. The departmental appeal annexed as annexure "G" is not available in official record. The appellant submitted application dated: 02.08.2019 which was regretted on 21.08.2019 (**Annex-M**) and the office of respondent No. 2 via respondent No. 1 sent the same.
12. The appellant applied for experience certificate but requested verbally to the concerned officer that don't mention regarding his removal in the certificate when his request was not accepted, he refused to take the certificate.
13. That the respondents may be allowed to raise additional grounds at the time of arguments.

3 62  
86

**Prayer:-**

It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/misstatements, hence may graciously be dismissed.



**Secretary,**  
Higher Education, Archives  
& Library Department  
Respondent No. 01

~~Handwritten signature~~  
Director 2/3/2022

Higher Education Department  
Respondent No. 02

Handwritten signature  
2/3/22

~~Handwritten signature~~  
Principal, 28/2/22

Govt; Postgraduate College, Karak  
Respondent No. 3



Annex - A

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GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

Dated Peshawar the 28.06.2013.

NOTIFICATION

NO. 9 (COLLEGES-II) HED/10-3/2012. Consequent upon the recommendation of Khyber Pakhtunkhwa Public Service Commission, the Competent Authority is pleased to appoint the following recommendees as lecturers in Biology (BPS-17) of College Cadre in Higher Education Department with immediate effect on the terms and conditions noted below and to post them in the colleges noted against each:

S. No.	Name/Father's Name/Address	Posted at	Remarks
1.	Mr. Asmat Ullah Khan S/o Rasool Badshah C/o Rasool Badshah, S.E.T G.H.S No. 2 Kohat City.	Govt. Degree College, Thall, Hangu.	Against vacant post
2.	Mr. Muhammad Israr S/o Nisar Muhammad District and Tehsil Mardan, P/o Manga, Village Hospital Killi.	Govt. Degree College, Katlang, Mardan.	Against vacant post
3.	Mr. Majid Khan S/o Allah Noor Badshah Village and P.O Saddo District Dir Lower Tehsil Timergara.	Govt. Degree College, Palai, Malakand.	Against vacant post
4.	Mr. Aamir Abbas Shah S/o Jafir Hussain Shah C/o Riaz Jara Principal Iqra Science School Paharpur, Tehsil Paharpur, District D.I. Khan.	Govt. Degree College, Paharpur, D.I. Khan.	Against vacant post
5.	Mr. Muhammad Israr Khan S/o Lal Zada Village Tordher, P.o Sakh No. 6, Tehsil Tangi, District Charsadda.	Govt. Degree College, Zarabi, Swabi.	Against vacant post
6.	Mr. Usman Ullah S/o Khair Ul Haq Village Adokey, Tehsil, P.O Khall, District Dir Lower.	Govt. Degree College, Dir Upper.	Against vacant post
7.	Mr. Shujat Ali S/o Muhammad Tariq House # TC-1488 Allama Iqbal Colony Murep Road Nawan Sher, Abbottabad.	Govt. Degree College, Sherwan, Abbottabad.	Against vacant post
8.	Muhammad Naeem Ullah S/o Muhammad Hashim Khan P/O khawaja Ahmad Mandan, Bannu.	Govt. Degree College, S.K. Bala, Bannu.	Against vacant post
9.	Mr. Waqas Khan S/o Afzal Khan Village Neelore P/o Nawan Sher District and Tehsil Abbottabad.	Govt. Degree College, Oghi, Mansehra.	Against vacant post
10.	Mr. Mustafa Kamal S/o Bunir Khan Village Manja Khel P/o Taji Kela District Bannu.	Govt. Degree College, Landi Jalandar, Bannu.	Against vacant post
11.	Mr. Irfan Babar S/o Fida Muhammad Village and Post Office Masma Tehsil & District Peshawar.	Govt. Degree College, Chagharmati, Peshawar.	Against vacant post

*Handwritten signature/initials*

*Handwritten signature/initials*

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Annex B

6  
62

DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # 091-9210242, 9211025/Fax # 9210215  
No. 12158 / CA-II / Estt: Branch/A-12/Asmatullah Khan/ Biology

Peshawar the 17<sup>th</sup> / 2015

To

The Principal  
Govt; Post Graduate College, Karak.

SUBJECT: ISSUANCE OF NO OBJECTION CERTIFICATE (NOC) AND  
STUDY LEAVE THROUGH CHANNEL.

Memo:

I am directed to refer to your letter No. 661 dated 31.03.2015 on the subject cited above and to state that the lecturer concerned has been working in this Department since 04.11.2010 and his service is less than five years, therefore, study leave applied by him is not admissible under the rules.

He may be informed accordingly.

*Anthony*

*M. Basha*  
DY: DIRECTOR (ESTABLISHMENT)

*etc*

Annex - 2

7  
9

GOVERNMENT POST GRADUATE COLLEGE KARAK  
(KHYBER PAKHTUNKHWA)

No. 208 Dated 1-03-14

From: The Principal,  
Government Post Graduate College  
Karak

To: The Director Higher Education,  
Khyber Pakhtunkhwa Pshawar

**Subject: No Objection Certificate**

Enclosed please find herewith an application in respect of Mr Asmat Ullah Khan  
Lecturer in Biology, of this college for further necessary action.

*fatima*

*Asmat Ullah Khan*  
PRINCIPAL  
G.P.G. College  
Karak

CAH  
RECEIVED  
15 MAR 2014  
3:36 PM  
2014

*File under action*  
*5/1/14*

- proposal.
- 3. IN THE MEANTIME, PREPARE YOUR ALTERNATIVE PACKAGE:
  - A. Download and fill in the "Admission Application Form for International Students" (attachment 1).
  - B. Download and fill in the "Application Form for CAS (QWAS President's Fellowship Programme)" (attachment 2).
  - C. REFERENCE LETTERS: you must ask the referees (preferably QWAS members, but not a mandatory requirement) familiar with you and you work to provide their scanned reference letters (signed, dated

*3/1/14*

8  
18  
19

To:

The Director Higher Education,  
Khyber Pakhtunkhwa Peshawar

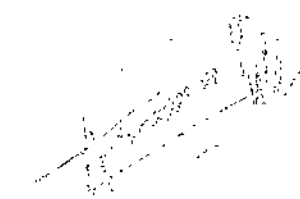
Subject: No Objection Certificate

Sir,

With due respect it is stated that Higher Education Commission of Pakistan has advertised CAS-IWAS President's Fellowship Programme for PhD studies in China. I want to apply for this scholarship for which I need No Objection Certificate (NOC). So, therefore it is humbly requested to grant me No Objection Certificate (NOC). I shall be very thankful to you.

I hope for the sympathetic consideration of my application.

Thanks



Yours Faithfully  
Asmat Ullah Khan  
Lecturer in Biology  
G.P.G.C Karak

*Asmat*

When you have found the best supervisor, you must contact him/her in a good and inform the CAS-IWAS President's Fellowship. Please send his/her or explain to your teacher who is in charge of the proposal.  
2. IN THE MEAN TIME, PLEASE YOUR REPLY TO THE CAS-IWAS.  
A - Download and fill the Admission Application Form for International Students/Foreigners  
B - Download and fill in the Application Form for CAS-IWAS President's Fellowship  
C - REFERENCE LETTERS: you must ask two referees to write a letter of recommendation for you.



Amex-D

Amex D

9  
20

DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # (01) 9210242, 9211025/Fax # 921021

No. 19879 / C-11/ Estt: Branch/ A-12/ Asma ul Ula/Biology

Dated Peshawar the \_\_\_\_\_ / \_\_\_\_\_ / 2014

The Principal  
Govt; Post Graduate College, Karak.

SUBJECT  
Memo:

NO OBJECTION CERTIFICATE.

I am directed to refer to your letter No. 208 dated 01.03.2014 received in this office on 05.03.2014, vide diary No. 3436 on the subject cited above and to request you to furnish a copy of charge report of appointment as lecturer in Biology alongwith a copy of transfer order from Govt; Degree College, Thall (Hangu) to Govt; Post Graduate College, Haripur and charge relinquish report in respect of the lecturer concerned. Moreover, this office has already issued NOC for admission in Ph.D at KUST, Kohat to the lecturer concerned vide this office letter No. 24442 dated 04.12.2013. Reason for obtaining another NOC may be clarified/justified.

*Amex*

BY: DIRECTOR (ESTABLISHMENT)

*[Signature]*

66

Annex-E

OFFICE OF THE PRINCIPAL  
GOVT POST GRADUATE COLLEGE KARAK  
No. 9820 / Asmat Ullah Dated Karak the  
30/4/2014

To  
The Director Higher Education  
Khyber Pakhtunkhwa Peshawar,

Subject: NO OBJECTION CERTIFICATE

Memo:  
Reference your letter No 9820/CA-II/Estab Branch. A-12/Asmat Ullah  
Dated 30/4/2014.

It is submitted for your information that a copy of charge report of  
appointment as a lecturer in Biology in respect of Mr. Asmat Ullah Khan along with a  
copy of transfer order from Govt Degree College Thall (Hangu) to Govt Post Graduate  
College Karak are enclosed here with as desired in your letter No cited above please. It is  
further stated that the lecturer concerned did not get admission in PHD in KUST due to  
the late receipt of N.O.C therefore, he applied for another N.O.C.

Encl: 3

*fatouh*

*Dr. Asmat Ullah Khan*  
Principal  
Govt Post Graduate College  
Karak

CAE  
RECEIVED ON  
30 JUN 2014  
By: *M. B. Khan* No: *291*  
Dist: *Karak*

Annex E1

DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # 091-9210242, 9211025/Fax # 9210215

No. 17282 / CA-11/Estt: Branch/1-12/ Asmatullah Khan /Biology

Dated Peshawar the 8/8/2014

11

The Section Officer (Colleges-II)  
Govt; of Khyber Pakhtunkhwa  
Higher Education Department Peshawar.

Handwritten initials/signature

SUBJECT: NO OBJECTION CERTIFICATE.  
Memo:

I am directed to enclose herewith a self-explanatory application alongwith enclosures in respect of Mr. Asmatullah Khan Lecturer in Biology Govt; Post Graduate College, Karak regarding NOC for Ph.D studies in China CAS-TWAS President's Fellowship Programme offered by Higher Education Commission for necessary action with the remarks that the lecturer concerned has been working in this Department since 28.06.2013 and he has hardly one year service at his credit.

It is requested that the case may be processed as per rules, please.

BY: DIRECTOR (ESTABLISHMENT)

Enclst; No. 17282

Copy of the above is forwarded to the Principal Govt; Post Graduate College, Karak with reference to his letter No. 981 dated 25.06.2014 for information.

Handwritten signature

BY: DIRECTOR (ESTABLISHMENT)

Annex - F

12

68

Dated Karak the 31-03-2015

From:

The Principal,  
Govt. Post Graduate College  
Karak.

To,

The Director Higher Education,  
Khyber Pakhtunkhwa Peshawar.

Subject: Issuance of No Objection Certificate (NOC) and Study Leave through Proper Channel

Memo:

Enclosed please find herewith NOC and study leave application in respect of Asrat Ullah Khan, Lecturer in Biology GPGC Karak for further necessary action.

*Asrat*

Principal,

Govt Post Graduate College

RECEIVED ON  
31 APR 2015  
3173 310

Annex I

13  
697

To  
The Director, Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

Through Proper Channel

Subject: Issuance of No Objection Certificate (NOC) and Study Leave in Respect of Asmat Ullah Khan Lecturer in Biology GPGC Karak.

Respected Sir,

It is stated that I am working as a lecturer in Government Post Graduate College Karak since 04 November 2010. I have applied for issuance of NOC regarding postgraduate studies abroad vide letter No: 1029 dated 22-07-2014 but I received no response. Consequently, I submitted an application as a reminder for the said purpose by letter No: 01 dated 01-01-2015 but to no avail. (photocopies attached as Annex I and II).

It has been once again requested that TWAS Cnpq fellowship for pursuing postgraduate research studies with University of Federal de Minas Gerias Brazil for the academic session 2015 has been awarded to me with full confirmation (copy attached as Annex III). The semester is going to start in near future. I therefore stand in need of NOC and study leave with all benefits.

You are earnestly requested to grant me NOC and study leave for the said purpose (study leave Performa attached as Annex IV).

Moreover, you are further requested to consider all my previous applications for NOC for PhD studies null and void please.

With complement and Regards,

Asmat Ullah Khan

Lecturer in Biology

GPGC Karak

*Asmat Ullah Khan*  
Dated: 31-03-2015

14  
20

ANNEX - 06  
DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # (99) 9210212, 9211025/Fax # 9210215  
No. 10/52 / CA-II / Estt. Branch/A-12/Asmatullah Khan/ Biology

Peshawar the 17/ 6 / 2015

To

The Principal  
Govt; Post Graduate College, Karak.

SUBJECT

ISSUANCE OF NO OBJECTION CERTIFICATE (NOC) AND  
STUDY LEAVE THROUGH CHANNEL.

Memo:

I am directed to refer to your letter No. 661 dated 31.03.2015 on the subject cited above and to state that the lecturer concerned has been working in this Department since 04.11.2010 and his service is less than five years, therefore; study leave applied by him is not admissible under the rules.

He may be informed accordingly.

*Asmatullah Khan*  
BY: DIRECTOR (ESTABLISHMENT)

9/6/15

*Asmatullah Khan*

Annexure



GOVERNMENT POST GRADUATE COLLEGE  
KARAK



No. 857

Dated 19/5/2015

To Mr. Asmatullah Khan  
Lecturer in Chemistry, GPGC, Karak

Subject: EXPLANATION

Memo: You are directed to explain your position regarding absence w.e.f  
01.5.2015 till the date. Your explanation should reach this office immediately.

*Asmatullah Khan*

*[Signature]*  
Principal  
GPGC, Karak.

Annex - H1

72



GOVERNMENT POST GRADUATE COLLEGE  
KARAK



No. 927

Dated 5/4/2015

To Mr. Asmatullah Khan  
Lecturer in Chemistry, GPGC, Karak

Subject: EXPLANATION REGARDING ABSENTEE.

Memo: Reference this office No. 854 /dated 19/5 2015 whereas you  
been asked to explain your position regarding absentee but no response has been received  
your end till now.

It is stressed strictly to explain your position in connection of absentee  
other wise disciplinary action will be taken against you.

*Asmatullah Khan*

*Dr. Asmatullah Khan*  
Principal  
GPGC, Karak.

Encl No. 928  
Copy submitted to the Director Higher Education, Khyber Pakhtunkhwa Peshawar  
information please.

*Dr. Asmatullah Khan*  
Principal  
GPGC, Karak.



Annex - I

17



GOVERNMENT POST GRADUATE COLLEGE  
KARAK



No. 1190

Dated 10-10-2015

To The Director  
Higher Education Khyber Pakhtunkhwa Peshawar.

Subject: ABSENCE FROM DUTY.

Memo: Reference this office Endst No.928 dated 5.6.2015 on the subject cited above.

It is stated that one Mr. Asmatullah Lecturer in Biology of this college remained absent from duty w.e.f. 1.5.2015 .After reported Explanation/reminder no response have been given by the officer concerned.

Furthermore it has come in to the notice of the undersigned that the said officer has been proceeded abroad for acquiring higher qualification i.e Ph-D as he has applied for study leave but no sanction has been granted till now.

The matter is hereby brought in to your kind notice: for further process please.

*[Signature]*  
Principal  
Govt Postgraduate college  
Karak.

*[Handwritten signature]*

*[Handwritten notes: C.A. No. 1190]*

RECEIVED ON  
10/10/2015  
*[Signature]*

*[Handwritten note: File under action 16/10/2015]*

Annex-J

18  
29

DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # 091-9210242, 9211025/Fax # 9210215

29788

/ CA. II / Fac. Branch / A. II / Asmatullah Biology

Date: Peshawar the 26/11/15

Annex-J

To

REGISTERED  
MOST IMMEDIATE

Mr. Asmatullah  
Lecturer in Biology  
Village Malage Banda P.O Sabir Abad  
Tehsil & District Karak.

SUBJECT ABSENCE FROM DUTY.

Memo:

I am directed to refer to the subject cited above and to inform that you had applied for Study Leave for 1401 days w.e.f 01.05.2015 to 28.02.2019 and your request was not acceded to. You left the College and proceeded abroad for higher studies without the approval of the Competent Authority which is willful and tantamount to misconduct. You have been absent from your duties since 01.05.2015 till date.

You are hereby directed in your own interest to report for duty within 15 days of the receipt of this letter and explain the reason of willful absence from duty failing which disciplinary action under E&D Rules, 2011 will be initiated against you.

Encl: No.

29788/1

BY: DIRECTOR (ESTABLISHMENT)

Copy of the above is forwarded to the Principal Govt. Post Graduate College, Karak with reference to his letter No. 1190 dated 10.10.2015 with the remarks to send copies of letters sent to the Lecturer concerned to this office and intimate latest position to this office.

*Signature*

BY: DIRECTOR (ESTABLISHMENT)

Annex - R

19  
703



GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT

No. SO(C-II)HED/12-3/2015/Asmatullah

Dated Peshawar the 18.02.2016.

To

The Director,  
Higher Education, Khyber Pakhtunkhwa,  
Peshawar.

**SUBJECT: ABSENCE FROM DUTY.**

I am directed to refer to your letter No. 154 dated 04.01.2016 on the subject noted above and to enclose herewith draft absence notice (both in English & Urdu version) duly signed by Secretary Higher Education Department in respect of Mr. Asmatullah lecturer in Biology Govt. Postgraduate College, Karak for necessary action at your end, please.

Encl: As above.

SECTION OFFICER (COLLEGE'S-II)

*Handwritten notes:*  
100/125  
A.A.O  
18/2/16

*Handwritten notes:*  
18/2/16  
**CAIT**  
RECEIVED  
18/2/16

Annex-K1  
7/20  
DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone # 091-9210242, 9211025/Fax # 9210215

CG 44, Tirth Bazaar/A-1 / Cantonment Peshawar

Dated Peshawar the 16/2/2016

To

The Director Information  
Khyber Pakhtunkhwa, Peshawar.

SUBJECT ABSENCE NOTICE.

Dear Sir,

I am directed to enclose herewith 07 copies of Absence Notice in respect of Mr Asmatullah, Lecturer in Biology, Govt; Post Graduate College, Karak with the request that the same may be published in two leading Newspapers at an early date, please.

Yours Faithfully,

(Mohammad Bashir)

6546, 07  
DY: DIRECTOR (ESTABLISHMENT)

Enclst; No.

Copy of the above is forwarded to the Section Officer (Colleges-II), Govt; of Khyber Pakhtunkhwa, Higher Education Department Peshawar with reference to his letter No. SO (Colleges-II)/HED/1323/2015/Asmatullah/1033 dated 18.02.2016

6546  
DY: DIRECTOR (ESTABLISHMENT)

Daily Notes  
Annex-K2

29-2-2016

ISIS groups are

category for which the bid is being submitted. Sealed bids will be received till 11:00 am on 16.03.2016 in the office of the Director (General, Army) Lahore. Bids will be opened on the same date and time by the Committee in the presence of bidders or their authorized representatives who may wish to attend.

DIRECTOR GENERAL ARMY

ABSENCE NOTICE

You, Asmatullah, Lecturer in Biology Govt. Post Graduate College, Kerak applied for Study Leave for 1401 days from 01.05.2015 to 29.02.2016 for pursuing PhD Studies abroad. As your service was less than two years therefore, the Director Higher Education Khyber Pakhtunkhwa vide letter No. 10139 dated 17.04.2015 regretted to accede to your request. Even when you left the country and proceeded abroad for PhD Studies without approval of the Competent Authority. The Principal concerned called several expatriates from you with the direction to join your duties otherwise disciplinary action will be initiated against you. The Director Higher Education Khyber Pakhtunkhwa also sent a registered letter No. 2978 dated 24.11.2015 on your home address with the direction to join your duties within 15 days but to no avail. You have willfully absented yourself from your duty since 01.05.2015 till date.

You are hereby directed in your own interest to report for duty within 15 days of the issuance of this notice and explain the reason of your willful absence from duty failing which it will be presumed that you are no more interested in your service and ex-parte action will be taken against you culminating in your dismissal from service.

SECRETARY (GENERAL) OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT  
ISMAILIYAH

Handwritten notes in Urdu script, likely a translation or commentary on the notice above.

*Asmatullah*

29-2-2016

Handwritten notes at the bottom of the page.

روزنامہ مشرقی پیپلز اسلام آباد (4) 29 نومبر 2015

کوہستان کے دو مقام افراسیاب کی عمر 70 سال یا زیادہ ہے کہ اس کا نام ہے کہ پندرہ  
برائے مانی سال 2015-16 کے لئے ساونہ کاغذ پر درخواست اور گورنر افراسیابی  
کاغذ کے 02 سو و دو ترقی سمیت 15 دن کے اندر ذریعہ تکمیل کے دفتر میں جمع  
کراویں۔ درخواست جمع کرتے وقت اپنی شناختی کارڈ دکھانا اور ایڈریس کو  
ذرا دینی ہے۔

Say No to Corruption \* InfoKP Govt \* @InfoKP \* Send KP to 0333 INF(P)393

**WALK IN INTERVIEW**

Govt. College of Technology Peshawar is looking for motivated, talented, dedicated and skilled individuals for their induction in the pool of experts / teachers for the field of computer. This staff will be engaged for teaching of the following courses.

1. B.Tech 4 Years degree Programme in Electrical, Mechanical, Civil Technologies.
2. 3 years Diploma of Associate Engineer.
3. One Year Diploma in Information Technology
4. Special Engineering Packages like Pro-E, Auto CAD, CAM CAD, etc.

**ELIGIBILITY CRITERIA**  
B.Sc in Computer System Engineering / Master or Equivalent degree in Computer Science (from HEC recognized University / Institution)  
A walk in interview for the purpose will be held in the office of the Principal on 10/03/2016 (Tuesday) at 09:00 AM.

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**NOTICE INVITING TENDERS**

C&W Department, C&W Division District Shangla, Government of Khyber Pakhtunkhwa invites sealed Bids from eligible firms / contractor in accordance with KPFR Procurement Rules 2014 on single stage Two envelope procedure for the following works. The bidders should be registered with Pakistan Engineering Council (PEC) in relevant category & field of specialization, enlisted with C&W Department and should have adequate financial soundness, relevant experience, personnel capabilities, require equipment and others as included in IFB.

S No	Name of work	Required Category of PEC	Bid Security	Period of completion	Last date of submission and time	Date of opening and time
Construction & Rehabilitation of Balna Machkundal Road, Peshloor Kabul Gram Road, Baghar Mandoral road, Dist: Shangla changed to Const. & Rehabilitation of Balna Machkundal Road, Gear Chaghazai Road, Bagyar Town and Mandoral Road Dist: Shangla.						
	Sub Work: Civil Work					
1	Peshloor Road (02-KM)	C-5	2%	As per work order	12/03/2016 At 12:00 hrs	On same day at 14:00 hrs
2	Gear Chaghazai Road (2.25-KM)	C-5	2%	As per work order	12/03/2016 At 12:00 hrs	On same day at 14:00 hrs
3	Balna Road (02-KM)	C-5	2%	As per work order	12/03/2016 At 12:00 hrs	On same day at 14:00 hrs
4	Mandoral Road (11-KM)	C-5	2%	As per work order	12/03/2016 At 12:00 hrs	On same day at 14:00 hrs

1. All documents including Tender Form, BOQ and instruction to bidders can be downloaded upto one day prior to the opening date from C&W web site (www.cwd.gkp.gov.pk).
2. Original Bid Security in the shape of call deposit in the name of Executive Engineer, C&W Division Shangla shall accompany the financial bid.
3. The bidders are required to send their bids (technical & financial) through courier in duplicate in separate envelopes clearly marked as Original & Duplicate. The Original (one) to be sent to the Executive Engineer, C&W Division Shangla and the Duplicate to Executive Engineer, C&W Circle Swat. Both the Original and Duplicate bids should reach the concerned office before closing date and time.

**EXECUTIVE ENGINEER**

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دفتر کا افتتاح کیا گیا ہے۔  
مراٹھ (پشاور) میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔

پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔

پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔

پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔

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پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔  
پشاور میں ایک نیا مدرسہ تعمیر کیا گیا ہے۔

Category	Percentage
Category 1	0.3%
Category 2	0.4%
Category 3	0.7%
Category 4	2.0%

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**ABSENCE NOTICE**

You, Amanullah, Lecturer in Biology, Government College, Karak applied for Study Leave for 1401 days with effect from 01.05.2015 to 23.07.2015 for pursuing M.Phil. Studies abroad. As your service was less than five years, your absence is therefore, considered as unauthorized absence. The Director Higher Education Khyber Pakhtunkhwa vide letter No. 10133 dated 17.04.2015 regretted to accept your request. Even then you left the country and proceeded abroad for Ph.D. Studies without approval of the Competent Authority. The Principal concerned called several explanations from you with the direction to join your duties otherwise disciplinary action will be initiated against you. The Director Higher Education, Khyber Pakhtunkhwa vide letter No. 29783 dated 24.11.2015 on your behalf directed you to join your duties within 15 days but to go away. You have willfully absented yourself from your duty since 01.05.2015 till date. You are hereby directed in your own interest to report for duty within 15 days of the issuance of this notice and report the reason of your willful absence from duty failing which it will be presumed that you are no longer interested in your service and ex-parte action will be taken against you culminating in your dismissal from service.

Say No to Corruption \* InfoKP Govt \* @InfoKP \* Send KP to 0333 INF(P)393

Annex-2

28/23

DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA,  
KHYBER ROAD PESHAWAR

Phone: 991-9210242, 9211025/Fax: # 9210215  
No. 1033 / CA-II / Estt: Branch / A-12 / Asmatullah / Biology

Dated Peshawar the 29/2 / 2016

To

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

SUBJECT ABSENCE NOTICE.

Respected Madam,

I am directed to refer to your office letter No. SO (Colleges-I) /12-3/2015/Asmatullah/1033 dated 18.02.2016 on the subject cited above and to state that Absence Notices in respect of Mr. Asmatullah Lecturer in Biology Govt; Post Graduate College, Karak were published in the daily News and in the daily Mashriq Peshawar on 29.02.2016 (Copies enclosed) wherein he was directed to report for duty within 15 days of the issuance of the notice but he has failed to do so.

It is, therefore, requested that further action may kindly be taken against the lecturer concerned as per rules, please.

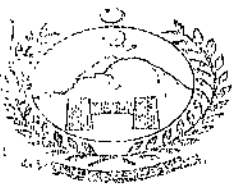
Yours Faithfully,

  
(Muhammad Bashir)

BY: DIRECTOR (ESTABLISHMENT)

*for copy*

GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT



Dated Peshawar the 25.07.2016.

NOTIFICATION

No. 30 (C-IDHED/12-3/2014) WHEREAS Mr. Asmatullah, lecturer in Biology (BS-17), Govt. Post Graduate College, Karak is absent from duties since 01-05-2015.

2. AND WHEREAS absence notices were issued to him on his home address as well as published in leading newspapers directing him to resume duty failing which ex-parte action under Khyber Pakhtunkhwa Efficiency & Discipline Rules, 2011 would be taken against him.

3. AND WHEREAS the accused lecturer did not report for duty in response to the absence notices.

4. NOW THEREFORE, The Competent Authority, in exercise of powers conferred upon him under the Khyber Pakhtunkhwa Efficiency & Discipline Rules, 2011, is pleased to impose upon him penalty of removal from service with immediate effect. The absence period w.e.f 01-05-2015 till imposition of penalty shall be treated as unauthorized absence from duty (without leave).

SECRETARY TO GOVT. OF  
KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

*DPLE*  
*For Enclaved Record.*

Encl: No. & Date Even.

Copy for information forwarded to the:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal Govt. Post Graduate College, Karak.
3. District Account Officer Karak.
4. Officer concerned.

*Jee*  
*27/7/16*

*Jasham*

*CA-1*  
*27/7/16*

*Rupesara Inbeon*  
SECTION OFFICER (COLLEGES-II)





25/8/19

Annes - M

The Director, Higher Education,  
Khyber Pakhtunkhwa, Peshawar.

Subject: Restoration of job as a lecturer in biology

Respected Sir,

It is stated that I was working as a lecturer in Government Post Graduate College Korak since 04 November 2010. I had applied for issuance of NOC regarding postgraduate studies abroad vide letter No: 1029 dated 22-07-2014 but I received no response. Consequently, I submitted an application as a reminder for the said purpose by letter No: 01 dated 01-01-2015 but to no avail. When my scholarship was confirmed I applied for the study leave vide letter No: 07 dated 29-04-2015 but I did not get any response till my presence.

I have completed my PhD and came back to Pakistan to join my parent department but I got the information that I have been terminated vide notification No: 3013-16 dated 25-07-2016. Since I followed all the departmental procedure but did not get any response from your side on this. Hence it is requested to review the termination order and I should be given the opportunity to defend myself.

Moreover, the higher education department is encouraging faculty member for pursuing higher studies by offering scholarship and incentives and the future of BS program is totally dependent on it.

Keeping in view the above facts, you are requested to consider termination notification No. 3013-16 dated 25-07-2016 null and void please and the duration of my absence should be considered as study leave without pay.

*Jahangir*

Dated: 02-08-2019

2019  
02/08/2019  
2019

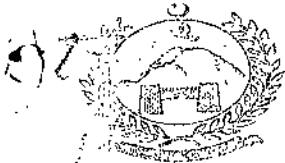
With complement and Regards,

Asmat Ullah Khan

Lecturer in Biology

GPCC Korak

*Asmat Ullah Khan*  
02/08/2019



*Annex - 1*  
**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA**

26 *[Signature]*

Rano Garhi, Peshawar

Tel # 091-9210242 / 9211026 Fax # 091-9210215

E-mail: [dhekpokssh@gmail.com](mailto:dhekpokssh@gmail.com) Facebook.com/dhekpeshawar Twitter.com/dhekpeshawar1

No. / CA-II/ Estt/ Branch/ A-12/ Asmatullah Khan/ Bio Dated Peshawar the 21/8/2019

To  
The Principal  
Govt; Post Graduate College, Karak.

SUBJECT RESTORATION OF JOB AS A LECTURER IN BIOLOGY.

Respected Sir, *محترم سر*

I am directed to refer to the application dated 02.08.2019 in respect of Mr. Asmatullah Khan, Lecturer in Biology of your College on the subject cited above and to state that the request of the officer concerned has been examined and regretted.

He may be informed accordingly.

*[Handwritten signature]*

*21/8/19*  
BY: DIRECTOR (ESTABLISHMENT)  
*[Handwritten initials]*