

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

C.M NO. _____/2023
IN
Service Appeal NO. 5233 /2021

MUHAMMAD ARIF

VS

EDUCATION DEPTT:

I N D E X

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Application with affidavit	1-2
2.	Death Certificate	A	3
3.	Copies of NICs	B	4-8
4.	Special Power of attorney	9-10
5.	Vakalatnama	11

APPLICANTS

Through


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

- 1 -

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

C.M NO. _____/2023
IN
Service Appeal NO. 5233 /2021

Khyber Pakhtunkhwa
Services Tribunal
Case No. 9021
Dated 15-11-2023

Mr. Muhammad Arif, Arabic Teacher (BPS-15)
GHSS, Kohi Sher Haider, District Khyber.Appellant

VS

1. The Secretary Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. The Director Education Merged Areas, Warsak Road Peshawar.
4. The District Education Officer, District Khyber.
5. The District Accounts officer District Khyber

.....Respondents

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

1. Mst: Tahira Naz, widow
2. Muhammad Idrees
3. Muhammad Nauman
4. Muhammad Salman
5. Muhammad Owais sons of Muhammad Arif (late), all residents of Behlola, Tehsil & District Charsadda.

Respectfully Sheweth:

1. That the above captioned Service Appeal is pending adjudication before this Hon'ble Tribunal, which is fixed for 22/01/2024.
2. That during pendency of the instant service appeal, the appellant has been died. (Copy of Death certificate is attached as Annexure A)
3. That present Applicants being his legal heirs, are necessary parties to the instant service appeal, therefore requesting to be impleaded on

-2-

the panel of the appellants. (Copies of the NICs are attached as Annexure B)

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

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

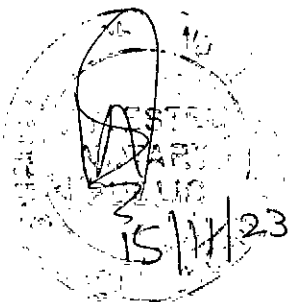

APPLICANTS

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

AFFIDAVIT

I, Muhammad Idrees S/o Muhammad Arif (late), all residents of Behlola, Tehsil & District Charsadda (applicant No 2/ special attorney for remaining applicants), do hereby solemnly affirm that the contents of this **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.




DEPONENT
CNIC NO: 17101-9987653-1

Death Registration Certificate

Form No: W13125404

دفتر اندراج: یونین کونسل بہلولہ

Tracking Id: 50081110012840

CRMS No: D500811-22-10518

OLD/M/REG #:

Deceased Person's Details

متوفی کے کوائف

Name:	MUHAMMAD ARIF	نام:	محمد عارف
Nationality:	Pakistani	قومیت:	پاکستانی
CNIC No:	17101-8444169-9	شناختی کارڈ نمبر:	17101-8444169-9
Date of Birth:	14-December-1964	تاریخ پیدائش:	14-December-1964
Gender:	Male	جنس:	مرد
Religion:	ISLAM	مذہب:	اسلام
Sickness Period:	00 Days 00 Months 00 Years	مدت علالت:	00 دن 00 ماہ 00 سال
Date of Death:	15-February-2022	تاریخ وفات:	15-February-2022
Date of Burial/Last rite:	15-February-2022	تاریخ تدفین/آخری رسومات:	15-February-2022
Place of Death:	HOME	جائے وفات:	گھر
Reason of Death:	Natural	درد وفات:	طبعی
Nature of Death:	Normal	کیفیت وفات:	طبیعی
Buried/Last rite at:	BEHLOLA	جگہ تدفین/آخری رسومات:	بہلولہ

Parental Information

والدین کی معلومات

Father's Name:	MAHMOOD	والد کا نام:	محمود
CNIC No:		شناختی کارڈ نمبر:	
Mother's Name:	ZOJANA	والدہ کا نام:	زوجانہ
CNIC No:		شناختی کارڈ نمبر:	

Address

پتہ

Address:	behlola payan , P.O. behlola , Village BAHOLA ,	پتہ:	بہلولہ پیمانہ ، ڈاکخانہ بہلولہ ، گاؤں بہلولہ ،
Tehsil:	CHARSADDA	تعمیر:	چار سددہ
District:	CHARSADDA	ضلع:	چار سددہ

Applicant's Details

درخواست دہندہ کے کوائف

Name:	MOHAMMAD NOMAN	نام:	محمد نومان
CNIC No:	17101-9564854-1	شناختی کارڈ نمبر:	17101-9564854-1
Relation with Deceased:	SON	متوفی سے رشتہ:	بیٹا

Information of Burial/Last rite by

تدفین/آخری رسومات کنندہ کی معلومات

Name:	MUHAMMAD IDREES	نام:	محمد ادریس
CNIC No:	17101-9987653-1	شناختی کارڈ نمبر:	17101-9987653-1
Relation with Deceased:	SON	متوفی سے رشتہ:	بیٹا
Entry Date:	23-February-2022	تاریخ اندراج:	23-February-2022
Issue Date:	23-February-2022	تاریخ اجراء:	23-February-2022
Entry Status:	Normal	اندراج اسٹیٹس:	نارسل

Additional information:

SECRETARY
BEHLOLA-1

This Certificate can be verified at <https://crms.nadra.gov.pk/verify>

W13125404

محررات

"B"-4-

حکومت پاکستان

قومی شناختی کارڈ

17101-8195988-2

اسلام آباد

سینٹرل

گورنمنٹ

سروس

01/01/1964



سولہواں

استیوار



T0D49N

شناختی نمبر: 17101-8195988-2
موجودہ رہت: ہولڈنگ کمانڈر، سولہواں کمانڈ، ایف ایف سی، اسلام آباد

سنگل پتہ: ایف ایف سی

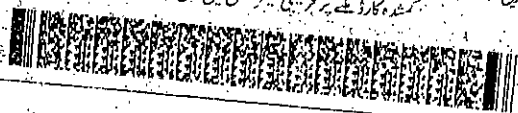
30/08/2024

تاریخ تسبیح

30/08/2014

تاریخ اجراء

گمشدہ کارڈ ملنے پر فریبی کپیٹس میں ڈال دیں



ATTESTED



حکومت پاکستان

قومی شناختی کارڈ

17101-9987653-1

نام: محمد ادریس

جنس: مرد

والد کا نام: محمد عارف

شناختی کارڈ: نمبر

16/02/1995

عمران پورہ



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-5-



3X6BIM

شناختی نمبر: 17101-9987653-1

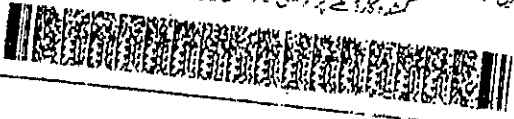
قومی شناختی کارڈ

مسکون پتہ: ایف

تاریخ: 10/05/2026

10/05/2016

گمشدہ کارڈ کے لیے پرقریبی لیٹر جس میں ڈالیں



DECLINED



حکومت پاکستان

قومی شناختی کارڈ
17101-9564854-1



نام: محمد نعمان

جنس: مرد

والد کا نام: محمد عارف

شناختی طاقت: برادری

تاریخ پیدائش: 07/02/1997

عثمان یوسف بھٹو

دستخط مشرک جنرل

دستخط کارڈ

-6-



3X6BIM شناختی نمبر: 17101-9564854-1 خاندان کبریہ
موجودہ پتہ: ہوتا، ڈاکنگال، اسلام آباد، کھیل و صنعت پارک



مسکین پتہ ایضاً

تاریخ اجراء: 24/03/2015 تاریخ منسوخ: 24/03/2025
گمشدہ کارڈ کے پر قریبی میٹرکس میں ڈال دیں



-7-



حکومت پاکستان
قومی شناختی کارڈ
17101-2019515-5



نام: محمد سلطان
جنس: مرد
ذاتی نام: محمد سید
شخصی نمبر: 17101-2019515-5
تاریخ: 07/07/1997

3X6BIM 17101-2019515-5



تاریخ: 12/10/2025
تاریخ: 12/10/2015
کھلے گا، یہ پر لکھی گئی تاریخیں ہیں



NOTED

PAKISTAN National Identity Card
 ISLAMIC REPUBLIC OF PAKISTAN

Name: **Mohammad Owais** محمد اویس

Father Name: **Muhammad Arif** محمد عارف

Gender: **M** | Country of Stay: **Pakistan**

Identity Number: **17101-1224595-3** | Date of Birth: **04.04.2000**

Date of Issue: **31.07.2018** | Date of Expiry: **31.07.2028**

[Signature]
 Holder's Signature

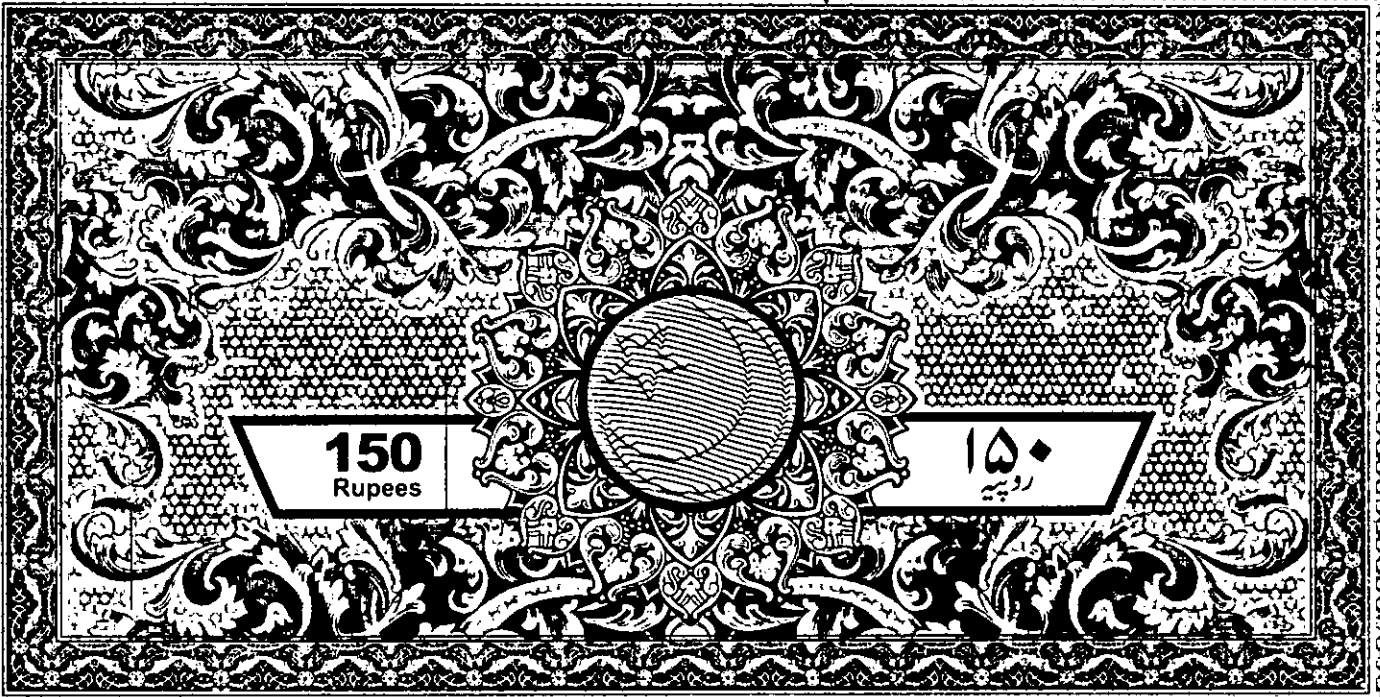
-8-

17101-1224595-3

101131218466

گمشدہ کارڈ ملنے پر قریبی لیویو ایکس میں ڈال دیں





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

Service Appeal NO. 5233/2021

MUHAMMAD ARIF VS GOVT: OF KP & OTHERS

SPECIAL POWER OF ATTORNEY

We (1) Mst: Tahira Naz, widow (2) Muhammad Nauman (3) Muhammad Salman (4) Muhammad Owais sons of Muhammad Arif (late), all residents of Behlola, Tehsil & District Charsadda, do hereby nominate Mr. Muhammad Idrees S/o Muhammad Arif (late) R/o Behlola, Tehsil & District Charsadda, constitute and appoint as our Special Attorney and authorize him to appear on our behalf in above titled case before the Khyber Pakhtunkhwa Services Tribunal, Peshawar.

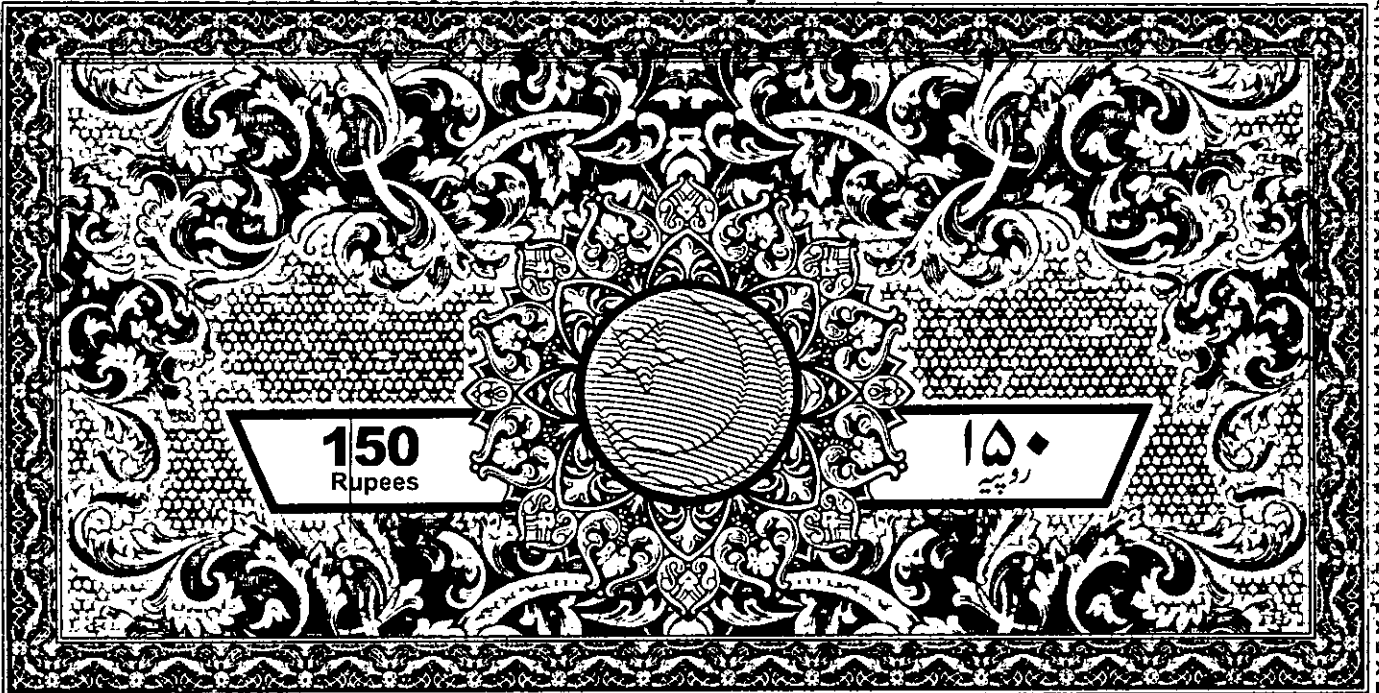
Mr. Muhammad Idrees is authorized/ empowered through this Special Power of Attorney to file petition, application, revision petition, appeal, review etc upto Apex Court, to furnish affidavits, Wakalat Nama on our behalf, to sign written statement, application, record evidence compromise etc; if need be and to also engage lawyer/ counsel on our behalf.

Every action taken or ought to be taken in this respect shall be admitted to us and shall be deemed to have been performed by us.

Handwritten signature and a rectangular stamp with illegible text.

11/4/13

M ZUBAIR Stamp Vendor
Peshawar Treasury
Fence No. 43 Date 01-09-06
High Court Peshawar

150
Rupees۱۵۰
روپیہ

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

Therefore, this Special Power of Attorney is signed and executed in favour of above mentioned person in presence of witnesses on this 10th day of November, 2023.

ACCEPTED BY:

Muhammad Idrees
CNIC: 17101-9989653-1

EXECUTANT

Mst: Tahira Naz
CNIC: 17101-8795988-2

Muhammad Nauman
CNIC: 17101-9564851-1

Muhammad Salman
CNIC: 17101-2019515-5

Muhammad Owais
CNIC: 17101-1224595-3

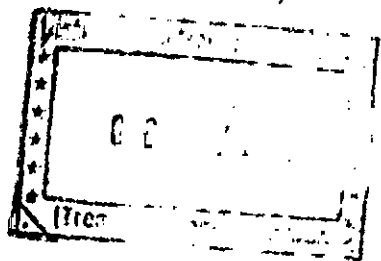
**WITNESS No.1**

Abdul Haleem
S/o. Mahmood Khan
Hafiz
CNIC: 16102-2271397-5

WITNESS No.2

Amir Zeb Khan
S/o Ghulam Qadir
Amir
CNIC: 17101-0314701-5

دینا کے لئے 11/43



* ZUBAIR Stamp Vender
Peshawar Treasury
Fence No. 43 Date 01-09-07
High Court Peshawa

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

_____ No _____/20____

Muhammad Arif (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Dept II (RESPONDENT)
(DEFENDANT)

I/We Applicants.

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. _____/_____/202


CLIENT

ACCEPTED


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


WALEED ADNAN


UMAR FAROOQ MOHMAND


MUHAMMAD AYUB

&


MAHMOOD JAN
ADVOCATES

OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)