

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

EP#662/2022  
IN  
S.A # 870/2012

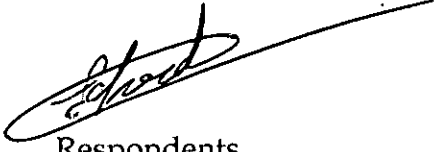
Mr. Bakht Rawan ..... Appellant

Versus

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

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Respondents



**DIRECTORATE OF HIGHER EDUCATION**

**KHYBER PAKHTUNKHWA**

**RANO GARHI, NEW CHAMKANI CHOWK, PESHAWAR**

Tel # 091-2650024

E-mail:- [dhekppesh@gmail.com](mailto:dhekppesh@gmail.com) [Facebook.com/dhekppeshawar](https://www.facebook.com/dhekppeshawar) [Twitter.com/dhekppeshawar1](https://twitter.com/dhekppeshawar1)

DHE/AD (Lit) /SA No. 19969 /

Dated Peshawar the 13 / 11 /2023

To

The Principal  
Govt Degree College, Mathra,  
Peshawar.

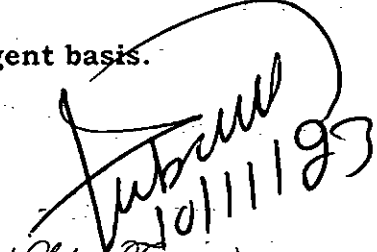
**Attention: - SOHRAB (LITIGATION OFFICER)**

**SUBJECT: - EP#662/2022 IN SA#870/2019 BAKHT RAWAN VERSUS GOVERNMENT OF KHYBER PAKHTUNKHWA**

Memo,

I am directed to refer to the subject noted above and to enclose herewith Application for release of salary of Director, Higher Education (**in original**) with the remarks to submit the same in Service Tribunal under intimation to this office, please.

**Note: Being court matter may be dealt with on urgent basis.**

  
(Lubna Farman)

**Assistant Director (Litigation)**

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT SWAT

EP # 662/2022

S.A # 870/2019

Bakht Rawan.....Appellant

Versus

Khyber Pakhtunkhwa  
Service Tribunal

Govt. of Khyber Pakhtunkhwa

Diary No. 9221

Through Chief Secretary, Govt. of

Khyber Pakhtunkhwa and others.....Respondents/Applicant

Dated 20-11-23

SUBJECT: APPLICATION FOR RELEASE OF SALARY OF RESPONDENT NO. 3  
(DIRECTOR, HIGHER EDUCATION)

**Respectfully Sheweth: -**

1. That the instant Execution Petition is pending before this Honable Tribunal and is fixed for hearing on 06.11.2023.
2. That vide order dated 04.09.2023, this Honourable Tribunal attached the salary of respondent no. 3. i.e. Director, Higher Education (**Annex-A**).
3. That the instant case has already been processed for implementation but it is pertinent to mention here that implementation in the instant case is not on the part of Director, Higher Education.
4. That letter of Principal, Govt. Degree College, Chakesar Shangla as referred in order dated 04.09.2023 is already forwarded to the office of respondents no. 2 vide letter dated 05.06.2023 (**Annex-C**).
5. That vide order dated 03.07.2023 last opportunity was granted by this Hon'ble tribunal (**Annex-D**) and the office of respondent no. 3 immediately take up the matter for implementation with the office of respondent no. 2 vide letters dated 14.07.2023 & 27.07.2023 (**Annex-E**) in response letter dated 11.08.2023 was received from the office of respondent no. 2 (**Annex-F**) where it was mentioned that the case has already been processed for approval of the competent authority and decision of the competent authority will be shared with the office of respondent no. 3 as and when received. But the decision is not received till date.
6. That vide letter dated 09.10.2023 & 24.10.2023, the office of respondent no. 3 again requested the office of respondent no 2 to share decision of the Provincial Govt. (**Annex-G**) and the office of respondent no 2 vide letter dated 16.10.2023

informed that as and when the decision of competent Authority is received the same will be shared (**Annex-H**)

7. That vide letter dated 27.10.2023, the office of respondent no. 3 again requested to expedite the process of implementation (**Annex-I**).

8. That implementation in the instant case is not on the part of respondent no 3.

**Prayer.**

It is humbly prayed that the instant application may be accepted and salary of respondent no. 3 may be released as implementation in the instant case is not on part of respondent no. 3.

*Farooqullah Shah*  
*Respondent - No-3*  
**DIRECTOR**  
**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA.**

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL CAMP COURT SWAT.**

EP#662/2022

IN

S.A # 870/2012

Mr. Bakht Rawan ..... Appellant

Versus

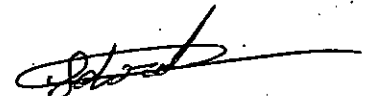
Govt of Khyber Pakhtunkhwa,  
Through Secretary, Higher Education,  
Khyber Pakhtunkhwa, Peshawar  
& others.....

Respondents/ Applicant

**AFFIDAVIT**

I, Sohrab, Lecturer in Law, Govt Degree College, Mathra, Peshawar do hereby declare and affirm on oath that the contents of application for release of salary are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court. It is further stated on oath that in this appeal the answering respondents have neither been placed ex-parte nor their defense has been struck off.

Identified by:

  
Deponent





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



189

**Rano Garhi, Peshawar**

Tel # 091-9330496 / 9214410

E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshawar Twitter.com/dhekpkeshawar

No. 2971 / CA-I/ Estt: Branch/A-12/Bakht Rawan/Urdu

Dated Peshawar the 5 / 6 /2023

To

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

SUBJECT

CONDITIONAL WITHDRAWAL OF NOTIFICATION DATED  
22.02.2019 IN RESPECT OF MR. BAKHT RAWAN, EX-  
ASSISTANT PROFESSOR OF URDU (BS-18).

Respected Madam, السلام عليكم

I am directed to refer to your letter No. SO (Colleges-II)/  
HED/12-16/2018/Bakht Rawan/164 dated 20.04.2023 and letter No. SO  
(Colleges-II)/ HED/12-16/2018/Bakht Rawan/1896 dated 02.06.2023 on the  
subject cited above and to enclose herewith details of financial implications  
duly verified by the District Accounts Officer, concerned in respect of Mr. Bakht  
Rawan, Ex-Assistant Professor of Urdu, Govt; Degree College, Chakessar,  
Shangla as desired, please.

Yours Faithfully,

(Gohar Khan)

DY: DIRECTOR (ESTABLISHMENT)



Annie-E 201

**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA**  
**RANO GARHI, NEW CHAMKANI CHOWK, PESHAWAR**

Tel # 091-2650024/ Fax # 091-2260181  
E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshawaar Twitter.com/dhekpkeshawaar1

No. DHE/AD (Lit)/ /

Dated Peshawar the 14/7 /2023

To

The Secretary,  
Higher Education Archives & Libraries Department,  
Khyber Pakhtunkhwa, Peshawar.

**Attention: - Section Officer (Litigation)**

**SUBJECT: - EP-662/2022 IN SA # 870/2019 BAKHT RAWAN VERSUS**  
**GOVERNMENT OF KHYBER PAKHTUNKHWA**

Respected Madam,

I am directed to refer to the subject noted above and to enclose herewith  
Copy of Order dated 03.07.2023 for information and necessary action, please.

Note: Being court matter may be given priority.

(*Lubna Farman*)

**Assistant Director (Litigation)**

Endst: No. 3656 /

✓ Copy of the above mentioned Order is forwarded to Deputy Director  
(Establishment) Local Directorate for information and necessary action, please.

*For n/action please*  
*17/07/2023*  
*CA-II*

*[Signature]*  
Assistant Director (Litigation)  
*2*



Anne - ~~A~~ E 202

**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA**

**Rano Garhi, Peshawar**

Tel # 091-2650025 / 9330496

E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshawar Twitter.com/dhekpkeshawar

No. 3864 / CA-I/ Estt: Branch/A-12/ Bakht Rawan/Urdu Dated Peshawar the 27/7 /2023

To

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

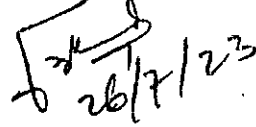
**Attention:- Section Officer (Colleges-II)**

**SUBJECT EP-662/2022 IN SA # 870/2019 BAKHT RAWAN VERSUS  
GOVT; OF KHYBER PAKHTUNKHWA.**


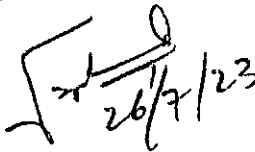
Respected Madam, السلام عليكم

I am directed to enclose herewith a copy of Order Sheet in respect of Mr. Bakht Rawan, Ex-Assistant Professor of Urdu, Govt; Degree College, Chakessar, Shangla received from Assistant Director (Litigation), Local Directorate on the subject cited above with the request that the orders of the Court may be implemented to avoid any adverse action, please.

Endst: No. 3865

  
26/7/23  
**DY: DIRECTOR (ESTABLISHMENT)**

Copy of the above is forwarded to the Assistant Director (Litigation), Local Director with reference to her Endst; No. 3656 dated 14.07.2023.

  
  
26/7/23  
**DY: DIRECTOR (ESTABLISHMENT)**





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

*Annex - I*

No.SO(C-II)/HED/29-2/2021/Bakht Rawan  
Dated Peshawar the 11<sup>th</sup> August, 2023

*8832-54*

To

The Director,  
Higher Education Khyber Pakhtunkhwa,  
Peshawar.

**SUBJECT: EP-662/2022 IN SA#870/2019 BAKHT RAWAN VERSUS GOVT; OF  
KHYBER PAKHTUNKHWA**

I am directed to refer to your letter No.3864/CA-I/Estt: Branch/A-12/Bakht Rawan/Urdu dated 27.07.2023 on the captioned subject and to state that the subject case has already been processed for approval of the competent authority. Decision of the competent authority will be shared with your good office as and when received.

**Encl: as Above.**

*(Signature)*  
**(ABDUL WALI KHAN)** *11/08/2023*

SECTION OFFICER (COLLEGES-II)

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

Copy is forwarded to the:

1. Section Officer (Litigation-II), Higher Education Department w/r to his letter No.SO(Lit-II)Higher Education Department/12-16/2018/Bakht Rawan dated 31.07.2023.
2. PS to Secretary, Higher Education Department.
3. PS to Special Secretary, Higher Education Department.

*(Signature)*

SECTION OFFICER (COLLEGES-II)

*11/08/2023*

*(Signature)*

2782 369

*DDCE*  
*(Signature)*  
*11/08/2023*



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



**Rano Garhi, Peshawar**

Tel # 091-2650025 / 9330496

E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshwar Twitter.com/dhekpkeshwar

No. 5508 / CA-I/ Estt: Branch/A-12/ Bakht Rawan/Urdu Dated Peshawar the 9/10 /2023

To

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

**Attention:- Section Officer (Colleges-II)**

**SUBJECT EP-662/2022 IN SA # 870/2019 BAKHT RAWAN VERSUS  
GOVT; OF KHYBER PAKHTUNKHWA.**

Respected Sir,

I am directed to refer to this office letter No. 3864 dated 27.07.2023 on the subject cited above and to enclose herewith Order Sheet dated 04.09.2023 with the request to convey the decision of the Provincial Government in the captioned case, if arrived at, please.

Yours faithfully,

(Fayaz Ahmad)

**RDY: DIRECTOR (ESTABLISHMENT)**

Endst: No. 5509

Copy of the above is forwarded to the Assistant Director (Litigation), Local Directorate.

**RDY: DIRECTOR (ESTABLISHMENT)**



*Annex-5*  
**DIRECTORATE OF HIGHER EDUCATION**  
**KHYBER PAKHTUNKHWA**  
**Rano Garhi, Peshawar**



Tel # 091-2650025 / 9330496

E-mail:- [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) Facebook.com/dhekpkeshwar Twitter.com/dhekpkeshwar

No. 5851 / CA-I/ Estt: Branch/A-12/ Bakht Rawan/Urdu Dated Peshawar the 24/10 /2023

To

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

**Attention:- Section Officer (Colleges-II)**

SUBJECT EP-662/2022 IN SA # 870/2019 BAKHT RAWAN VERSUS GOVT; OF KHYBER PAKHTUNKHWA.

Respected Sir,

I am directed to refer to this office letter No. 3864 dated 27.07.2023 and subsequent letter No. 5508 dated 09.10.2023 on the subject cited above and to enclose herewith Order Sheet dated 02.10.2023 with the request to convey the decision of the Provincial Government in the captioned case, if arrived at, please.

Yours faithfully,

(Fayaz Ahmad)

**DY: DIRECTOR (ESTABLISHMENT)**

Endst: No. 5852

Copy of the above is forwarded to the Assistant Director (Litigation), Local Directorate.

**DY: DIRECTOR (ESTABLISHMENT)**

Annex - H

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

No.SO(C-II)/HED/29-2/2021/Bakht Rawan  
Dated Peshawar the 16<sup>th</sup> October, 2023

To

The Director,  
Higher Education Khyber Pakhtunkhwa,  
Peshawar.

10/384.

P-207/C

**SUBJECT: EP-662/2022 IN SA#870/2019 BAKHT RAWAN VERSUS GOVT. OF  
KHYBER PAKHTUNKHWA**

I am directed to refer to your letter No.5508/CA-I/Estt: Branch/A-12/Bakht Rawan/Urdu dated 09.10.2023 on the captioned subject and to state that the subject case has already been processed for approval of the competent authority. Decision of the competent authority will be shared with your good office as and when received.

**(ABDUL WALI KHAN)**  
SECTION OFFICER (COLLEGES-II)

16/10/2023

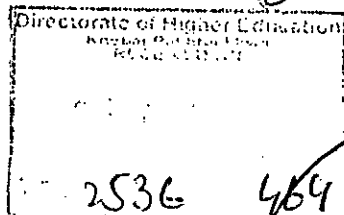
**ENDST: NO. & DATE EVEN.**

Copy is forwarded to the:

1. Section Officer (Litigation-II), Higher Education Department
2. PS to Secretary, Higher Education Department.
3. PS to Special Secretary, Higher Education Department.

SECTION OFFICER (COLLEGES-II)

16/10/2023



2536

469

*Subul  
24/10/23*

*DD (E)*

*24/10/23  
CA-I*

*AD (E)*

*23-10-23*



**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA  
RANO GHARI, CHAMKANI STOP, PESHAWAR**

Tel # 091-2650024 / Fax # 091-2260181

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

**AUTHORITY LETTER**

Mr. Sohrab, (Lecturer in Law) Govt. Degree College, Mathra is hereby authorised to submit the Application for release of Salary in Service Tribunal, in *E.P. No#* 662/2022 In S.A # 870/2019 Mr. Bakht Rawan versus Govt. of Khyber Pakhtunkhwa on behalf of Director, Higher Education.

**Director**

Directorate of Higher Education,  
Khyber Pakhtunkhwa Peshawar