

Serial Nos	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	20.03.2018	<p style="text-align: center;"><b><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u></b></p> <p style="text-align: center;">Appeal No. 999/2015</p> <p style="text-align: center;">Date of Institution ... 26.08.2015 Date of Decision ... 20.03.2018</p> <p style="text-align: center;">Maulana Muhammad Abdul Kabir son of Abdul Rasheed resident of Sheikh Kalay, Warsak Road, Mathra, Tehsil &amp; District Peshawar.</p> <p style="text-align: center;">Versus</p> <p>1. Administration Auqaf, Government of Khyber Pakhtunkhwa Eidgah Charsadda Road, Peshawar &amp; Others.</p> <p><b><u>JUDGMENT</u></b> <b><u>MUHAMMAD HAMID MUGHAL, MEMBER:</u></b> - Learned counsel for the appellant and, learned counsel for the respondents present.</p> <p>2. The appellant has filed the present service appeal u/s 4 Khyber Pakhtunkwa Service Tribunal Act 1974 against the order dated 11.12.2014 whereby the appellant was removed from service due to willful absence from duty under Rule 11-(a) of the WEST PAKISTAN AUQAF DEPARTMENT (KHATEEBS AND IMAMS) SERVICE RULES, 1968.</p>

20.03.18

3. Arguments of the Learned counsel for the appellant and learned counsel for the respondents heard. File perused.

4. At the very outset Learned counsel for the respondents vehemently stressed that since the appellant was appointed under WEST PAKISTAN AUQAF DEPARTMENT (KHATEEB AND IMAMS) SERVICE RULES, 1968 therefore the appellant cannot be termed as civil servant. Hence this Tribunal has got no jurisdiction to entertain the present service appeal. As against that Learned counsel for the appellant defended the present service appeal before this Tribunal on the issue of jurisdiction of this Tribunal and in this respect relied upon the judgment of Hon'ble Peshawar High Court Peshawar titled MUHAMMAD AZIZ ULLAH versus THE VICE CHANCELLOR, ISLAMIA COLLEGE UNIVERSITY, PESHAWAR through Registrar & 2 others 2017 PLC (C.S) Note 84.

5. Admittedly the appellant was appointed against the post of Imam/Khateeb/Mudaris in the Auqaf Department. The scheme of the law governing the Auqaf Department/Waqf Properties is that the same has been promulgated to provide for the proper management and administration of Waqf properties. Under the scheme the government may vest the

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aw.

Auqaf properties, in the Chief Administrator of Auqaf, who shall be a corporation sole by the name of Chief Administrator of Auqaf and shall have perpetual succession and an official seal and may sue and be sued in his corporate name. Similarly all the moneys received or realised by the Chief Administrator in respect of properties under his control and management, shall form and be credited to a fund to be called Auqaf Fund. The WEST PAKISTAN AUQAF DEPARTMENT (KHATEEBES AND IMAMS) SERVICE RULES, 1968 have been made for regulating the conditions of service and conduct of Khateebes, Imams, Khateeb cum Imams, District Khateebes, and Zonal Khateebes under the Auqaf Department and their pay is debatable to the Auqaf Fund, while their appointing authority is Chief Administrator of Auqaf.

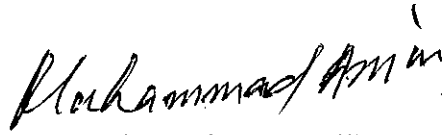
6. In the light of above scenario this Tribunal is of the considered opinion that the appellant is not a civil servant within the meaning of Khyber Pakhtunkwa Service Tribunal Act 1974 or Khyber Pakhtunkhwa Civil Servants Act, 1973. The case laws cited by the learned counsel for the appellant as mentioned above pertains to the jurisdiction of Hon'ble Peshawar High Court Peshawar and is not relevant for the purpose of determining the issue of jurisdiction of the Service

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Tribunal. Consequently the present appeal is returned for want of jurisdiction. Parties are left to bear their own costs. File be consigned to the record room after its completion.

ANNOUNCED

20.03.2018



(Muhammad Amin Kundi)  
MEMBER





(Muhammad Hamid Mughal)  
MEMBER

Service Appeal No. 999/2015

01.02.2018


Appellant in person and Mr. Ziaullah, Deputy District Attorney for the respondents present. Due to general strike of the Bar, learned counsel for the appellant is not available today hence, adjourned. To come up for arguments on 08.03.2018 before D.B.


  
(Muhammad Amin Khan Kundi)  
Member (J)

  
(Muhammad Hamid Mughal)  
Member (J)

08.03.2018

Learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for respondent No.2 present. Learned counsel also present for remaining respondents. Arguments heard. To come up for order on 20.03.2018 before D.B

  
(M. Amin Khan Kundi)  
Member

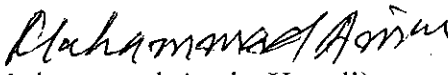
  
(Muhammad Hamid Mughal)  
Member


20.03.2018

Learned counsel for the appellant and Learned counsel for the respondents present. Vide separate judgment of today placed on file, this Tribunal is of the considered opinion that the appellant is not a civil servant within the meaning of Khyber Pakhtunkwa Service Tribunal Act 1974 or Khyber Pakhtunkwa Civil Servants Act, 1973. The case laws cited by the learned counsel for the appellant as mentioned above pertains to the jurisdiction of Hon'ble Peshawar High Court Peshawar and is not relevant for the purpose of determining the issue of jurisdiction of the Service Tribunal. Consequently the present appeal is ~~returned~~ *returned* for want of jurisdiction. Parties are left to bear their own costs. File be consigned to the record room after its completion.

ANNOUNCED


20.03.2018


  
(Muhammad Amin Kundi)  
MEMBER

  
(Muhammad Hamid Mughal)  
MEMBER

29.09.2017


Appellant in person present. Mr. Nasir Mahmood, Advocate for respondents No. 1, 2 & 4 to 7 and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Zakiullah, Senior Auditor for respondent No. 3 also present. Appellant requested for adjournment on the ground that his counsel is busy before the Hon'ble Supreme Court of Pakistan. Adjourned. To come up for arguments on 20.10.2017 before D.B.


  
(Gul Zeb Khan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

20.10.2017

Counsel for the appellant and Mr. Ziaullah, DDA alongwith Mr. Muhammad Amin, Legal Officer and Mr. Zakiullah, Senior Auditor for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 01.12.2017 before D.B.

  
Member  
(Executive)

  
Member  
(Judicial)

01.12.2017

Since 1<sup>st</sup> December, 2017 has been declared as Public Holiday on account of Rabbi-ul-Awal. To come up for arguments on 01.02.2018 before the D.B.

  
Reader

29.05.2017

Clerk to counsel for appellant and Mr. Muhammad Jan, Deputy District Attorney for respondent present. Clerk to counsel for appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on 05.09.2017 before D.B. The case is not fixed before D.B in which Learned Member Executive (Ahmad Hassan) is setting.



(Muhammad Amin Khan Kundi)  
Member




(Gul Zeb Khan)  
Member

05.09.2017

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Assistant Advocate General for respondents present. Counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 29.09.2017 before D.B.  
*Adjournment requested for Production of record.*



(Muhammad Amin Khan Kundi)  
Member



(Muhammad Hamid Mughal)  
Member

03.10.2016

Since 3<sup>rd</sup> October, 2016 has been declared as public holiday on account of 1<sup>st</sup> Muharram therefore, case is adjourned for 10-1-17.

  
Reader

10.01.2017

Counsel for the appellant and Assistant AG for respondents present. Learned counsel for the appellant is directed to file rejoinder. One of the learned Member Executive (Ahmad Hassan) remain as appellate authority in the instant appeal hence, the instant appeal may be assigned to another bench in which the present learned Member Executive is not sitting. The case may be put up to the Hon'ble Chairman for appropriate order. To come up for rejoinder and arguments on 29.05.2017.

  
(AHMAD HASSAN)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

03.02.2017

File received to-day from Bench-II and order sheet dated 10.01.2017 perused. Office is directed to fix the case before a D.B in which Mr. Ahmad Hassan, learned Member (Executive) is not sitting.

  
Chairman



22.03.2016

Appellant in person, M/S Nasar-Menullah, Litigation Officer and Ansar Ahmed, AAO alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 27.4.2016 before S.B.

  
Chairman

27.4.2016

Appellant in person and Mr. Nasrum Minullah, Litigation Officer alongwith Addl: A.G for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 22.07.2016 before S.B

  
Chairman

22.07.2016

Appellant in person, M/S Nasrum Minullah, Litigation Office and Zakiullah, Senior Auditor alongwith Additional AG for respondents present. Written reply on behalf of respondents submitted. Cost of Rs. 1000/- also paid and receipt thereof obtained from the appellant. The appeal may be placed before D.B for rejoinder and final hearing for 03.10.2016. The Chairman may assign the appeal to appropriate D.B.

  
MEMBER

11.09.2015

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was serving as Khateeb at Tandoor Bazar, Ghanta Ghar on the basis of appointment order dated 12.1.2001. That during service he applied for overseas study and leave for a period of one year followed by another leave period for one year which leave was granted without pay and where-after appellant resumed his duty and later on vide application 23.8.2013 again applied for leave for two months so as to collect his Educational Qualification Degree etc. That the appellant was orally permitted but after going abroad his application was rejected on 9.9.2013 followed by impugned order in the shape of removal from service dated 11.12.2014 against which appellant preferred departmental appeal on 17.3.2015 which was not responded and hence the instant service appeal on 26.8.2015.

That the appellant was neither subjected to any inquiry nor the publication was made in the prescribed manners and excessive punishment in the shape of removal from service was awarded which was against facts and unwarranted.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.11.2015 before S.B. Notice of application for condonation of delay be also issued for the date fixed.

  
Chairman

26.11.2015

Appellant in person, M/S Nasar-menullah, Litigation Officer and Ansar Ahmed, AAO alongwith Addl. A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 22.3.2016 before S.B.

  
Chairman

Appellant Deposited  
Security & Process Fee

FORM-A

FORM OF ORDER SHEET

Court \_\_\_\_\_

Case No. 999/2015

	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	04.09.2015  11-9-15	<p>The appeal of Maulana Muhammad Abdul Kabir, resubmitted to-day by Mr. Altaf Samad, Advocate may be entered in the institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>11-9-15</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

The appeal of Maulana Muhammad Abdul Kabir son of Abdul Rasheed received to-day i.e. on 26.08.2015 is incomplete on the following score which is returned to the counsel for the appellent for completion and resubmission within 15 days.

- 1- Copy of leave application mentioned in para-7 of the memo of appeal (Annexure-C) is not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-G of the appeal is illegible which may be replaced by legible/better one.
- 4- Address of respondent No. 6 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

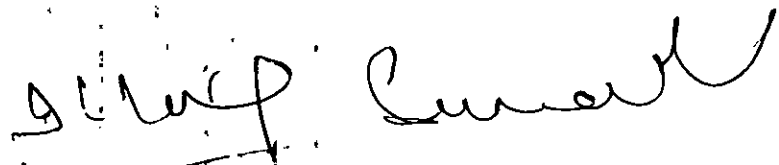
No. 1279 /S.T,

Dt. 26/8 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Altaf Samad Adv. Pesh.

- all the document  
available with me  
compliance with.



AS

**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.A.No. 999 /2015

Maulana Muhammad Abdul Kabir.....Appellants


**VERSUS**

Administration Auqaf, Govt. of KPK,

Eidgah Charsadda Road, Peshawar and others.....Respondents

**INDEX**

S. #	Description of documents.	Annexure	Pages
1.	Service Appeal		1-5
2.	Application for condonation of delay		6
3.	Application for condonation of delay with additional groundsq		7
4.	Application for interim relief with affidavit		8-9
5.	Copy of appointment letter of the appellant	A	10-11
6.	Copy of academic testimonials	B	12-25
7.	Copy of departmental appeal	C	26
8.	Copy of earlier applications of appellants for leave which were allowed by the respondents and rejection of appeal	D	27-34
9.	Copy of notices of non-attendance and newspaper clippings	E	35-40
10.	Copy of appreciation letter	F	41
11.	Copy of termination letter	G	42
12.	Wakalatnama		43



*Appellant*

Maulana Muhammad Abdul Kabir

Through



**Altaf Samad Advocate**

Supreme Court of Pakistan

Cell: 0333-9127292



Dated:

**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.A.No. 999 /2015

Maulana Muhammad Abdul Kabir S/o Abdul Rasheed  
R/o, Sheikh Kalay, Warsak Road, Mathra, Tehsil & District  
Peshawar

.....Appellant

**VERSUS**

- 1) Administration Auqaf, Govt. of KPK, Eidgah Charsadda Road, Peshawar.
- 2) Govt. of KPK, through Secretary Auqaf Eidgah Charsadda Road, Peshawar.
- 3) Accountant General, Govt. of KPK, Peshawar Cantt, Peshawar
- 4) Section Officer, Auqaf Department, KPK Peshawar Eidgah Charsadda Road, Peshawar.
- 5) Accounts Officer, Auqaf Department, KPK Peshawar Eidgah Charsadda Road, Peshawar.
- 6) Relevant Manager Auqaf, Govt. of KPK, Peshawar Eidgah Charsadda Road, Peshawar.
- 7) P.S to Secretary Auqaf, Hajj Religious and Monitory Affairs Department Khyber Road, Kachehri, Peshawar

.....Respondents

**Service Appeal u/s 4 of KPK service Tribunal Act, 1974 against the order dated 11.12.2014, whereby the appellant has been removed from the service.**

**Prayer**

**On acceptance of this appeal, the impugned order dated 11.12.2014 may kindly be set-aside/ cancelled and the appellant may kindly be reinstated in his service with all back benefits.**

***Respectfully Sheweth:-***

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant is the peaceful, law abiding citizen of Pakistan and belongs to a respectable and poor family, and are the only bread earner of their family.
- 2) That the appellant has been appointed as Imam/ Khateeb in BPS-12 vide order dated 02.1.2002 (Copy of appointment order is attached as Annexure "A" to "A/1")
- 3) That the appellant got M.A qualification in this relevant filed and the appellant is the bonafide citizen of Pakistan and is

**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.A.No. 999 /2015

A.W.F. Province  
Service Tribunal

Diary No. 1010

Dated 26-8-2015

Maulana Muhammad Abdul Kabir S/o Abdul Rasheed  
R/o, Sheikh Kalay, Warsak Road, Mathra, Tehsil & District  
Peshawar

.....Appellant

**VERSUS**

- 1) Administration Auqaf, Govt. of KPK, Eidgah Charsadda Road, Peshawar.
- 2) Govt. of KPK, through Secretary Auqaf Eidgah Charsadda Road, Peshawar.
- 3) Accountant General, Govt. of KPK, Peshawar.
- 4) Section Officer, Auqaf Department, KPK Peshawar.
- 5) Accounts Officer, Auqaf Department, KPK Peshawar.
- 6) Relevant Manager Auqaf, Govt. of KPK, Peshawar.
- 7) P.S to Secretary Auqaf, Hajj Religious and Monitory Affairs Department.

.....Respondents

**Service Appeal u/s 4 of KPK service Tribunal Act, 1974 against the order dated 11.12.2014, whereby the appellant has been removed from the service.**

**Prayer**

**On acceptance of this appeal, the impugned order dated 11.12.2014 may kindly be set-aside/ cancelled and the appellant may kindly be reinstated in his service with all back benefits.**

**Respectfully Sheweth:-**

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant is the peaceful, law abiding citizen of Pakistan and belongs to a respectable and poor family, and are the only bread earner of their family.
- 2) That the appellant has been appointed as Imam/ Khateeb in BPS-12 vide order dated 02.1.2002 (Copy of appointment order is attached as Annexure "A" to "A/1")
- 3) That the appellant got M.A qualification in this relevant filed and the appellant is the bonafide citizen of Pakistan and is

*[Handwritten signature]*

26/8/15

qualified for the said post, and after the said appointment on the said post the appellant performed his duties and no complaint has been made against the appellant. (Copies of educational documents are attached as Annexure "B/1 to B/14")

- 4) That the appellant was performing his duties in said department diligently, honestly and with full satisfaction.
- 5) That the appellant is the permanent employee of the respondents department.
- 6) That the appellant was performing his duties and was never remains absent from the job neither any complaint of misconduct has been lodged against the appellant.
- 7) That the appellant applied for leave to the respondents for obtaining the degree awarded in Saudi Arabia for 2 months, but the Government officials of the said country stopped him on unknown reasons. (Copy of application is attached as Annexure "C")
- 8) That previously the appellant also applied for the leave and appellant not reported to the department on the due dates due to some reasons which were beyond the control of the appellant and department, mercely, graciously condoned unexpected leave of the appellant and present situation is of the same nature. (Copies of leave applications are attached as Annexure "D to D/7)
- 9) That the respondents never ever communicated with the appellant nor informed him through his resident that the respondents not accepted the leave application of the appellant.
- 10) That even publication in the newspaper is made on the wrong address. (Copy of newspaper clippings are Annexure "E")
- 11) That the appellant got numerous appreciations letters from the Government on his stand on war against terrorism. (Copy of which is annexed as Annexure "F")
- 12) That finally the appellant was terminated without any notice. (Copy of termination letter dated 11.12.2014 is attached as Annexure "G")



- 13) That being aggrieved of the removal order dated 11.12.2014 the appellants filed this appeal, inter alia, on the following grounds.

#### GROUNDS

1. That the appellant is a Hafiz-e-Quran and foreign qualified.
2. That the appellant has been condemned unheard.
3. That no right of proper inquiry is given while dismissing the appellant.
4. That the right of natural justice is violated.
5. That the whole family's life of the appellant is suffered.
6. That at least some respect is to be given to the Hafiz-ul-Quran.
7. That the appellant is even ready to surrender is promotion, increment and leave salary if the appellant is reinstated in his original post.
8. That the post on which the appellant has served is still vacant, no fresh appointment is made and appellant suffers irreparable loss if he is not re-instated in his service.
9. That the alleged act of the respondents are against the principle of the policy and against the fundamental rights at least some respect has to be given to the person / employees in Religious department.
10. That the respondents used their supervisory, discretionary, administration power which is against the law of land, hence, not tenable.
11. That there is no estoppel against law.
12. That there is no waiver against law.
13. That there is no limitation against law.
14. That the petition is suffered from the hot and cold of the department.
15. That the appellants got reoccurring cause of action.
16. That the appellants' right to life is involved.

17. That the appellants are discriminated.
18. That the appellants are deprived of due process of law and justice.
19. That the appellants are the sole earning hands of their families.
20. That still the posts on which the appellants were working are still vacant and if the appellants are adjusted, appointed no person is going to be affected.
21. That the act of the non-acceptance of the application for two months extra ordinary leave is against the law and without lawful authority.
22. That the right to education is a fundamental right of the appellant as also enshrined by the principle of policy that once permission is granted for higher education for the Saudi Arabia for the period about 4 years at his own cost of the appellant then how they stopped the appellant without any reasonable excuse/ ground for not collecting his professional degree, which is the physical existence of completion of education.
23. That there is no reason given for not acceptance of his leave application.
24. That there is no laches against law.
25. That at present the appellant is over age and not fit for any other job.
26. That the appellant has a career of 15 years service to the concerned department.
27. That right of education includes all procedure formalities for the acquisition of degree.
28. That whether acquisition of education degree is a part of education.
29. That no factual controversy is involved in the instant lis, so the appellants got no adequate/ affective remedy except to approach this Hon'ble Court.

30. That the discretionary powers is to be exercised, honestly, fairly, objectively.
31. That even the order of the respondents is against the Section-24-A of the General Clause Act.
32. That the appellants are religious employees of the department.
33. That alleged termination / dismissal is backed by political motivation.
34. That the appellants may permitted to raise any point not specifically pleaded in the instant appeal.

It is, therefore, humbly prayed that on acceptance of this appeal:

- a. The appellants may graciously be reinstated in his service and termination/ dismissal letter dated 11.12.2014 may graciously be set-aside.
- b. That till the decision of this appeal the appellant may kindly be permitted to work on his service/ post.
- c. That the department may graciously be restrained not to make fresh appointment on the post concerned.

Appellant

Maulana Muhammad Abdul Kabir

Through

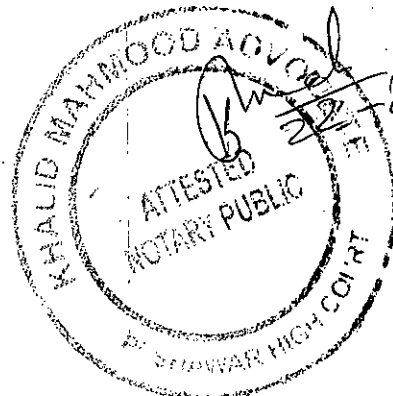
Altat Samad Advocate

Supreme Court of Pakistan

Cell: 0333-9127292

### AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



Deponent

*(Signature)*

**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

**S.A.No. \_\_\_\_\_/2015**

Maulana Muhammad Abdul Kabir.....Appellant

**VERSUS**

Administration Auqaf, Govt. of KPK,


Eidgah Charsadda Road, Peshawar and others.....Respondents

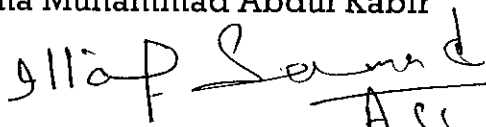
**APPLICATION FOR CONDONATION OF  
DELAY IN FILING OF INSTANT APPEAL**

Respectfully Sheweth:

1. That the instant appeal is being filed before this Hon'ble Tribunal wherein no date of hearing has been fixed so far.
2. That the appellant got the re-occurring cause of action.
3. That the valuable rights of the appellant are involved.
4. That there is no bar to file the instant application.
5. That the contents of this application may kindly be considered part and parcel of main writ petition.
6. That the appellant belongs to poor family having limited resources, and if any delay cause may kindly be condoned in the interest of justice.

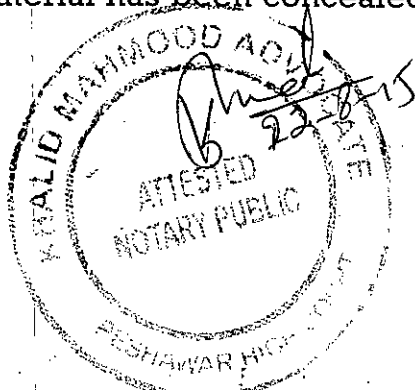
It is, therefore humbly prayed that, on acceptance of this application, any delay, latches in filing of instant appeal may graciously be condoned.

Appellant   
Maulana Muhammad Abdul Kabir

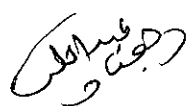
Through   
**Altaf Samad Advocate**  
Supreme Court of Pakistan

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



**Deponent**



**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.A.No. \_\_\_\_\_/2015

Maulana Muhammad Abdul Kabir.....Appellant

**VERSUS**

Administration Auqaf, Govt. of KPK,

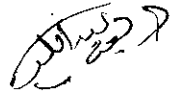
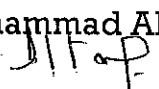
Eidgah Charsadda Road, Peshawar and others.....Respondents

**APPLICATION FOR CONDONATION OF  
DELAY WITH ADDITIONAL GROUNDS IN  
FILING OF INSTANT APPEAL**

Respectfully Sheweth:

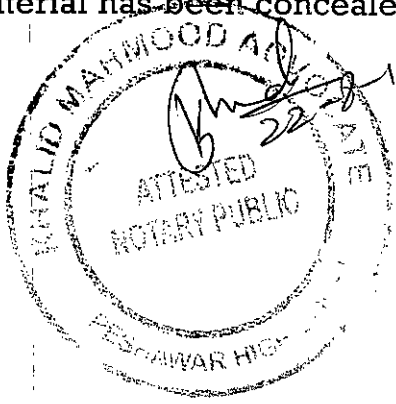
1. That the instant grounds of condonation of delay may graciously be considered as part and parcel of the connected application for condonation of delay.
2. That the appellant is a poor person and burden a family of 8/9 persons including aged father so, making arrangement for funds for filing instant application is a ground for condonation of delay
3. That the summer vacation is also a hurdle in filing criminal appeal before this Tribunal.
4. That petitioner's uncle unnatural death is also a ground for condonation of delay, because the appellant attended the funeral ceremony of his uncle in a far flung area from his residential area.

It is, therefore, humbly prayed that, on acceptance of this application, the instants additional grounds for condonation of delay may graciously be considered as part and parcel of the connected application for condonation of delay.

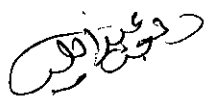
*Appellant*   
 Maulana Muhammad Abdul Kabir  
*Through*  *Samad*  
**Altaf Samad Advocate**  
 Supreme Court of Pakistan *AS*

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



**Deponent**



**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.S.No. \_\_\_\_\_/2015

Maulana Muhammad Abdul Kabir.....Appellant

**VERSUS**

Administration Auqaf, Govt. of KPK,

Eidgah Charsadda Road, Peshawar and others.....Respondents


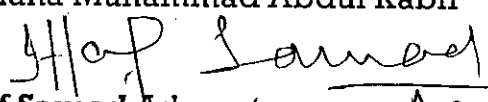
Application for grant of interim relief by suspending operation of impugned order dated 11.12.2014 till the final decision of titled appeal, by reinstatement of the appellant in his service.

Respectfully Sheweth:

1. That the instant appeal is being filed before this Hon'ble Court wherein no date of hearing has been fixed so far.
2. That the appellant got the re-occurring cause of action.
3. That the valuable rights of the appellant are involved.
4. That there is no bar to file the instant application.
5. That the contents of this application may kindly be considered part and parcel of main writ petition.
6. That the appellant belongs to poor family having limited resources, and if any delay cause may kindly be condoned in the interest of justice.
7. That on the face of it the appellant got a prima-facie and strong arguable case, is sanguine about its success and balance of convenience also lies in the favour of the appellant for grant of interim injunction.

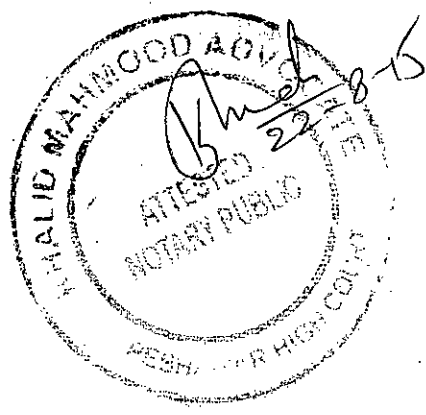
- 8. That if the operation of the impugned order dated 11.12.2014 has not been suspended and interim relief has not been granted in favour of appellant, then appellant would sustained irreparable loss in terms of money.
- 9. That any other ground may be taken at the time of arguments, with the kind permission of this Hon'ble Tribunal.

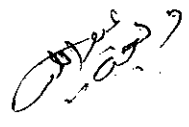
It is, therefore humbly prayed that, on acceptance of this application, interim relief may kindly be granted in favour of appellant as prayed for in the heading of this application, till the final disposal of the main appeal.

*Appellant*   
 Maulana Muhammad Abdul Kabir  
*Through*   
**Altaf Samad Advocate**  
 Supreme Court of Pakistan  
 Cell: 0333-9127292 *AS*

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



**Deponent**  


ANNEX 10

OFFICE OF THE  
ADMINISTRATOR AUQAF,  
NWFP, PESHAWAR

No. 315 /105 /Auqaf  
Dated Peshawar the, 12-1- /2001

TO /


Abdul Kabeer s/o Haji Abdur Rashid  
Village Sheikh Kall P.O Mathra Tehsil & Distt: Peshawar.

Subject: - SELECTION OF IMAM/KHATEEB/MUDARIS

Memo


In pursuance of the recommendation of Departmental Selection Committee and approval of the competent authority, you have been selected for the post of Imam/Khateeb/Mudaris in BPS-12 in the Auqaf Department.

If the post offered is acceptable to you, then report to this office on any working day from 8.00 a.m to 2.30 p.m within a period of 15 days of the receipt of this offer/letter. In case of failure within the stipulated period it will be presumed that you are not willing to join the duty.

  
Administrator Auqaf,  
NWFP, Peshawa.

Copy to;  
Member Board of Revenue/Chief Administrator Auqaf for  
information.

**ATTESTED**  


  
Administrator Auqaf,  
NWFP, Peshawar



1

**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.A.No. 999 /2015

A.W.F. Province  
Service Tribunal

Diary No. 1010

Dated 26-8-2015

Maulana Muhammad Abdul Kabir S/o Abdul Rasheed  
R/o, Sheikh Kalay, Warsak Road, Mathra, Tehsil & District  
Peshawar

.....Appellant

**VERSUS**

- 1) Administration Auqaf, Govt. of KPK, Eidgah Charsadda Road, Peshawar.
- 2) Govt. of KPK, through Secretary Auqaf Eidgah Charsadda Road, Peshawar.
- 3) Accountant General, Govt. of KPK, Peshawar.
- 4) Section Officer, Auqaf Department, KPK Peshawar.
- 5) Accounts Officer, Auqaf Department, KPK Peshawar.
- 6) Relevant Manager Auqaf, Govt. of KPK, Peshawar.
- 7) P.S to Secretary Auqaf, Hajj Religious and Monitory Affairs Department.

.....Respondents

**Service Appeal u/s 4 of KPK service Tribunal Act, 1974 against the order dated 11.12.2014, whereby the appellant has been removed from the service.**

**Prayer**

On acceptance of this appeal, the impugned order dated 11.12.2014 may kindly be set-aside/ cancelled and the appellant may kindly be reinstated in his service with all back benefits.

**Respectfully Showeth:-**

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant is the peaceful, law abiding citizen of Pakistan and belongs to a respectable and poor family, and are the only bread earner of their family.

That the appellant has been appointed as Imam/ Khateeb in BPS-12 vide order dated 02.1.2002 (Copy of appointment order is attached as Annexure "A" to "A/1")

- 3) That the appellant got M.A qualification in this relevant filed and the appellant is the bonafide citizen of Pakistan and is

S Date of  
r. order/  
17 proceeding  
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Order or other proceedings with signature of Judge or  
Magistrate

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Appeal No. 999/2015

Date of Institution ... 26.08.2015  
Date of Decision ... 20.03.2018

Maulana Muhammad Abdul Kabir son of Abdul Rasheed  
resident of Sheikh Kalay, Warsak Road, Mathra,  
Tehsil & District Peshawar.

Versus

1. Administration Auqaf, Government of Khyber  
Pakhtunkhwa Eidgah Charsadda Road, Peshawar &  
Others.

20.03.2018

JUDGMENT

MUHAMMAD HAMID MUGHAL, MEMBER: - Learned  
counsel for the appellant and, learned counsel for the  
respondents present.

2. The appellant has filed the present service appeal u/s 4  
Khyber Pakhtunkwa Service Tribunal Act 1974 against the  
order dated 11.12.2014 whereby the appellant was removed  
from service due to willful absence from duty under Rule 11-  
(a) of the WEST PAKISTAN AUQAF DEPARTMENT  
(KHATEEBS AND IMAMS) SERVICE RULES, 1968.

3. Arguments of the Learned counsel for the appellant and learned counsel for the respondents heard. File perused.

4. At the very outset Learned counsel for the respondents vehemently stressed that since the appellant was appointed under WEST PAKISTAN AUQAF DEPARTMENT (KHATEEBES AND IMAMS) SERVICE RULES, 1968 therefore the appellant cannot be termed as civil servant. Hence this Tribunal has got no jurisdiction to entertain the present service appeal. As against that Learned counsel for the appellant defended the present service appeal before this Tribunal on the issue of jurisdiction of this Tribunal and in this respect relied upon the judgment of Hon'ble Peshawar High Court Peshawar titled MUHAMMAD AZIZ ULLAH versus THE VICE CHANCELLOR, ISLAMIA COLLEGE UNIVERSITY, PESHAWAR through Registrar & 2 others 2017 PLC (C.S) Note 84.

5. Admittedly the appellant was appointed against the post of Imam/Khateeb/Mudaris in the Auqaf Department. The scheme of the law governing the Auqaf Department/Waqf Properties is that the same has been promulgated to provide for the proper management and administration of Waqf properties. Under the scheme the government may vest the

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Auqaf properties, in the Chief Administrator of Auqaf, who shall be a corporation sole by the name of Chief Administrator of Auqaf and shall have perpetual succession and an official seal and may sue and be sued in his corporate name. Similarly all the moneys received or realised by the Chief Administrator in respect of properties under his control and management, shall form and be credited to a fund to be called Auqaf Fund.

The WEST PAKISTAN AUQAF DEPARTMENT (KHATEEBES AND IMAMS) SERVICE RULES, 1968 have been made for regulating the conditions of service and conduct of Khateebes, Imams, Khateeb cum Imams, District Khateebes, and Zonal Khateebes under the Auqaf Department and their pay is debatable to the Auqaf Fund, while their appointing authority is Chief Administrator of Auqaf.

6. In the light of above scenario this Tribunal is of the considered opinion that the appellant is not a civil servant within the meaning of Khyber Pakhtunkwa Service Tribunal Act 1974 or Khyber Pakhtunkhwa Civil Servants Act, 1973. The case laws cited by the learned counsel for the appellant as mentioned above pertains to the jurisdiction of Hon'ble Peshawar High Court Peshawar and is not relevant for the purpose of determining the issue of jurisdiction of the Service

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Tribunal. Consequently the present appeal is returned for want of jurisdiction. Parties are left to bear their own costs. File be consigned to the record room after its completion.

ANNOUNCED  
20.03.2018

O R D E R

No. \_\_\_\_\_/1(c)5/Auqaf dated 27/01/2002. Abdul Kabear  
s/o Haji Abdur Rashid r/o Shekh Killi, P.O. Mathra  
Tehsil Peshawar District Peshawar who has  
reported his arrival in pursuance of this department offer letter  
No. 15 /1(c)5/Auqaf dated 12.01.2001 is hereby  
appointed as Tawal/Kitieb (BPS-12) in Tandoor Bazar  
w.e.f. the date of arrival.

His service will be governed by the following terms and  
conditions :-

1. His appointment will be on a probation for a period of two years.
2. He will be allowed BPS-12 plus usual allowances as admissible under the rules.
3. He shall be governed by such rules and orders as prescribed by the Govt/Auqaf Department from time to time and the Efficiency and Discipline Rules 1973 etc.
4. His service shall be liable to termination at any time without assigning any reason on one month notice.
5. In case he wishes to resign he will serve one month notice or in lieu thereof one month pay shall be forfeited.
6. He should produce medical fitness certificate within 15 days, failing which the appointment order will be considered as cancelled.

*Sd/-*  
Administrator Auqaf,  
N.W.F.P, Peshawar.

Endst No. 323-27/11/02

Copy forwarded to the:-

1. Member Board of Revenue/Chief Administrator Auqaf, NWFP.
2. Dy Administrator-I & II Auqaf, NWFP.
3. Accounts Officer Auqaf, NWFP.
4. Manager Auqaf - \_\_\_\_\_
5. Official concerned.

*Sd/-*  
Administrator Auqaf,  
N.W.F.P, Peshawar.

**ATTESTED**  
*Sd/-*

ATTIESTED



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
شهادة العالمية  
في العلوم والآداب والعلوم الإسلامية



الحمد لله رب العالمين والصلوة والسلام على خاتمة الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة  
وفاق المدارس العربية باكستان تشهد بأن الشيخ ..... عبد الكبير ..... بن ..... حاجي عبد الرشيد ..... من ..... پشاور .....  
المولود في عام ١٣٩٤هـ - ١٩٧٤م قد أتم الدراسة النهائية في جامعته دار العلوم كراتشي. ونجح في امتحانها النهائي المنعقد  
تحت إشراف وفاق المدارس العربية في شعبان ١٤١٢م - بتقدير جيد جداً. وبناءً على ذلك استحق الشهادة العالمية  
ورئيس الوفاق إذ يمنحه هذه الشهادة يوصيه بتقوى الله تعالى - ويسأل الله عز وجل أن يسلك به سبيل العلماء العاملين -



توقيع مدير الامتحان  
توقيع مدير الامتحان

توقيع مدير الامتحان

توقيع مدير الامتحان

توقيع مدير الامتحان  
محمد رشيد خان

رقم التسجيل: ٣٢٨٣١  
رقم البروس: ١٦٤٩  
الدرجات: ٤٠٥ / ٦٠٠  
محل الإصدار: المكتبة الرئيسية ملتان  
التاريخ: ١٤١٢هـ / ١٤١٢م / ١٩٩٧م

AMERICAN B 12

جامعة دار العلوم كراتشي  
قسم الدراسات الإسلامية العليا

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
شهادة العالمية  
في العلوم الإسلامية



رقم التسجيل  
٢٧٨  
التاريخ  
١٤١٨/٥/٢٧ هـ

الحمد لله الذي جعل الشريعة المطهرة مقياساً للحلال والحرام، وأثار لها معالم وأعلاماً يهتدى بها المتخبطون في غياهب الديجور ودركات الظلام، وأقام لها أمة قائمين بأمر الله لا يضرهم من خذلهم ولا يخافون في الله مصيبات الملام، ثم أخلصهم في كل عصر جماعة يحفظون الدين وينقلون الأحكام، فطوبى لهم من حملة العلوم وورثة الأنبياء العظام والصلوة والسلام على من أرسله حين ما أظلمت الدنيا واحاطت بها حنادس الشرك ورجس الأصنام ليقيم الملة الموحدة ويطهرها عن دنس الكفر ونجاسة الأنصاب والأزلام، فمهد صلوات الله وسلامه عليه للشريعة أصولاً، وبين لها فروعاً وفصولاً حتى صارت منيعة لا ترام وعلى الله وأصحابه البررة الكرام المستمسكين بذرق عمود الإسلام القائمين لنصرة الدين مقاماً تنزل فيه الأقدام، وبعد:

فان السيد الأخ عبده الكبير بن الحاج عبد الرشيد المولود في عام ١٣٩٤ هـ / ١٩٧٤ م. قد أتم دراسته في جامعة دار العلوم كراتشي حسب المنهاج المقترر للعالمية ونجح في امتحانها النهائي المنعقد لتاريخ ٣ / ٨ / ١٤١٧ هـ الموافق ١٢ / ١٤ / ١٩٩٦ م. بتقدير جيد جداً فبناءً على ذلك استحق "شهادة العالمية في العلوم الإسلامية والعربية".

ورئاسة جامعة دار العلوم كراتشي اذ تمنحه هذه الشهادة توصيه بتقوى الله سرّاً وعلناً وان يتبع السنة السنية مجداً في نشر العلوم الدينية مقفياً لأثار السلف الصالحين مجتنباً عما أحدثه المبتدعة من الإختراع في الدين، عاصباً بنواجذه على ما مضى عليه القرون المشهود لها بالخير من الصحابة والتابعين والائمة المجتهدين - رضوان الله تعالى عليهم وعلى من تبعهم أجمعين، والله المستعان وهو موفق لكل خير.

عميد الدراسات  
٢٨  
١٨  
دائمه نشر العلوم كراتشي

رئيس الجامعة  
دار العلوم كراتشي



الاسم  
الدرجة  
رقم الجلوس: ١٤٤٩ الدرجات: ٤٠٧/٦٠٠

٤٠٧/٦٠٠





بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
 وفاق المدارس العربية  
 باكستان

# كشف الدرجات

امتحان الشهادة العالمية في العلوم الاسلامية والعربية (الجزء الاسلامي)  
 عام 1414 هـ

رقم التسجيل 32131 سنة 1996  
 رقم الجلوس 1649  
 اسم الطالب محمد الكبير  
 اسم الوالد حاجي محمد ترشد  
 المديرية بساور  
 تاريخ الميلاد 1392 هـ / 1972 م  
 الدورات 1  
 اسم الجامعة جامعة دار العلوم كراچی

الدرجات	الكتب الدراسية	الدرجات	الكتب الدراسية
70	السنن لأبي داود	68	الصحیح للبخاری
09	السنن مع الشمائل	50	الصحیح لمسلو
80	الموطان مع الطحاوي	60	الجامع للترمذی

الدرجة الصغرى 60 - الدرجة الكبرى 100 - مجموع الدرجات 200 - الدرجات المحصلة 207

تشهد دار وفاق المدارس العربية ان الطالب المذكور اعلاناً قد نجح في امتحان الشهادة العالمية

بتقدير حميد جدا  
 وتقدیر محمد حميد  
 المكتب الرئيسي ملتان



توقيع مراقب الامتحان

محمد حميد

التاريخ 3 JAN 1996

ATTESTED  
 محمد حميد

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



# شهادة العالمية في العلوم والآداب الإسلامية



أحمد لله رب العالمين والصلوة والسلام على خاتم الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. أمابعد، فإن رئاسة  
وفاء المدارس العربية باكستان تشهد بأن الشيخ عبد الكبير بن عبد الرشيد من پشاور  
المولود في عام ١٩٤٤م - ١٩٤٤م قد أتم الدراسة العالمية في جامعة الاستقلال <sup>بمعه</sup> <sup>محل به</sup> پشاور ونجح في امتحانها النهائي المنعقد تحت إشراف  
وفاء المدارس العربية في شعبان ١٤١٥هـ - ١٩٩٥م. بتقدير جيد. وبناء على ذلك استحق الشهادة العالمية  
ورئيس الوفاق إذ يمنحه هذه الشهادة يوصيه بتقوى الله تعالى. ويسأل الله عز وجل أن يسلك به سبيل العلماء العاملين.



توقيع مدير الجامعة

عبد الرشيد

توقيع رئيس القسم

محمد رشيد

توقيع الامين العام

محمد رشيد

توقيع رئيس الوفاق

محمد رشيد خان

رقم التسجيل: ٨٩٥٤

رقم الملف: ٦١٠

محل الإصدار: المكتب الرئيسي ملتان

الدرجات: ٣٠٦ / ٦٠٠

التاريخ: ١٨ / ١٠ / ١٤١٥ / ٢٠ / ١٩٩٥



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاء المدارس العربية

باكستان

## كشف الدرجات

امتحان الشهادة العالمية في العلوم الإسلامية والعربية (بي. اے)

عام ۱۹۹۵ھ

رقم التسجيل ۱۹۵۶

رقم الجلوس ۶۱۰

اسم الطالب عبد المنعم

اسم الوالد عبد الرشید

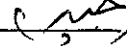
تاریخ الميلاد ۱۳۹۳ھ / ۱۹۷۳ء

اسم الجامعة جامعة العلوم الإسلامية العربیة (بی. اے)

المادة	الدرجات	المادة	الدرجات
التفسير	۵	اصول الفقه	۵۳
الحديث والفرائض	۶۰	الفلسفة والعقائد	۵۰
الفقه	۵۸	اللغة العربية والعروض	۵۰

الدرجة الصغرى ۴۰ - الدرجة الكبرى ۱۰۰ - مجموع الدرجات ۶۰۰ - الدرجات المحصلة ۳۰۶

تشهد ذرة وفاء المدارس العربية أن الطالب المذكور أعلاه قد نجح في امتحان الشهادة العالمية

بتقدير  وصلى الله على سيدنا محمد وآله وصحبه وسلم

توقيع مراقب الامتحان



المكتب الرئيسى منان

التاريخ 10 MAR 1995

ATTESTED



بسم الله الرحمن الرحيم

# شهادة

## الثانوية الخاصة



الحمد لله رب العالمين، والصلاة والسلام على خاتم الأنبياء والمرسلين، وعلى آله وصحبه أجمعين، أما بعد، فإن رئاسة

وفاء للأمانة لرسالة الإسلام، بن عبد الكبير - - - - - بن عبد الرشيد - - - - -

من - - - - - بشاري - - - - - المولود في عام - - - - - 1354هـ/1934م، قد أتت دراسة الثانوية الخاصة في جامعتنا العلمية الإسلامية السموية السعيدة بما ورد

ونجح في الامتحان النهائي المنعقد تحت إشراف وفاق المدارس العربية باكستان في شجانه 13/12/1993م - بتقدير - - - - - (جيد) - - - - - وبناءً على ذلك

استحق الشهادة ورئيس الوقاف إذ يمنحه هذا الشهادته توصيفه بتقوى الله تعالى ويسأل الله تعالى أن يسلك بهم سبيل العلماء العاملين .

توقيع

رئيس الجامعة/ مدير المدرسة

توقيع

رئيس الوقاف

رقم التسجيل: 11222

توقيع

مدير المدرسة

توقيع

رئيس الوقاف

رقم الجلوس: 3



مدير المدرسة

رئيس الوقاف

رئيس الوقاف

رقم الدرجات: 225/100

محل الإصدار: المكتبة الرئيسية، فلان

التاريخ: 13/12/1993م

ATTESTED



في إجازة راحة الأئمة الأربعة

# المشاورية المسماة

بسم الله الرحمن الرحيم



الحمد لله رب العالمين ، والصلوة والسلام على خاتم الأنبياء والمرسلين ، وعلى آله وصحبه أجمعين ، أما بعد فإن رئاسة  
 وفاق المعهد العربي بباكستان تشهد بأن الطالب حافظ عبد الكبير بن عبد الرشيد  
 من يشاور --- المولود في عام ١٣٩٤ هـ الموافق ١٩٧٤ م وقد اتم دراسته الثانوية العامة في دار العلوم سورجندشتاور  
 ونجح في الامتحان النهائي المنعقد تحت إشراف وفاق المدارس العربية بباكستان في شعبان ١٤١١ هـ بتقدير جيداً وبنياً على ذلك  
 استحق الشهادة ورئيس الوراق أن يمنحه هذه الشهادة بوصفه يستحق الله تعالى ودين الله عز وجل أن يسلك به سبيل العلم والعملين

رقم التسجيل: ١١٩٥٠	رقم الوراق: ٣٠	رقم التسجيل: ١١٩٥٠	رقم الوراق: ٣٠
عمل الأصم: المكنت للرئيسي ملتان	عمل الأصم: المكنت للرئيسي ملتان	عمل الأصم: المكنت للرئيسي ملتان	عمل الأصم: المكنت للرئيسي ملتان
تاريخ: ١٥/٩/١٤١١ هـ / ٤/١١/١٩٩٢ م	تاريخ: ١٥/٩/١٤١١ هـ / ٤/١١/١٩٩٢ م	تاريخ: ١٥/٩/١٤١١ هـ / ٤/١١/١٩٩٢ م	تاريخ: ١٥/٩/١٤١١ هـ / ٤/١١/١٩٩٢ م

ATTESTED



# شهادة حفظ القرآن الحكيم



الحمد لله رب العالمين، والصلوة والسلام على خاتم النبيين، سيدنا محمد وعلى آله وصحبه أجمعين - وبعد:

تشهد رئاسة "وفاق المدارس العربية" باكستان بأن الطالب ----- عبد الكبير  
 بن ----- عبد الرشيد ----- من ----- پشاور ----- المولود في عام ١٣٩٤ هـ / ٤ / ١٩٧٥  
 قد حفظ القرآن الكريم كاملاً بظهر الغيب في جامع اسلامية دار الحديث سرحد پشاور عام ١٤١٩ هـ / ١٠ / ١٩٩٨ - ونجح في اختبار  
 الحفظ المنقذ تحت إشراف وفاق المدارس العربية بتقدير - لجدته جدياً، وبناء على ذلك قرر مجلس الوفاق منحه شهادة  
 حفظ القرآن الكريم ورئيس الوفاق اذ يمنحة هذه الشهادة يوصيه بتقوى الله عز وجل، وان يتعاهد القرآن الكريم بتلاوته  
 اثناء الليل واطراف النهار، وان يعمل بتعاليمه، وان يعلمه غيره، والله الموفق -



التاريخ: ١٤١٠ / ١٥ / ٢٠١٩

المدرس  
 محمد بن محمد

مدير المدرسة  
 محمد بن محمد

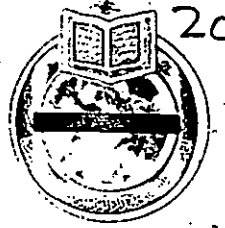
الامين العام  
 احمد الرحمن

مدير الوفاق  
 سمير شيخان

رقم التسجيل: ٢٦٠٠٨

رقم الشهادة: ٢٤١٧٧

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السند للفراغ عن القراءة والتجويد للقرآن المجيد

من مدرسة المركزي دارالقرآن بشار وباكستان

الحمد لله الذي وسع سماعتها وأذن سماعتها بما نزلنا بها العجايب والنبوءات والبراهين على سيدنا محمد وآله الطيبين الطاهرين في كل ليلة من ليالي القدر في شهر رمضان المبارك في ليلة القدر في سنة الف وثمانين وخمسة مائة للهجرة النبوية الشريفة... كماله العزيم الموقر من الله بالبحر العميق

الحافظ الفاضل مولانا عبد الكبير بن عبد السيد من بشار وباكستان

الحمد لله الذي وسع سماعتها وأذن سماعتها بما نزلنا بها العجايب والنبوءات والبراهين على سيدنا محمد وآله الطيبين الطاهرين في كل ليلة من ليالي القدر في شهر رمضان المبارك في ليلة القدر في سنة الف وثمانين وخمسة مائة للهجرة النبوية الشريفة... كماله العزيم الموقر من الله بالبحر العميق

ختم المدرسة

توقيع المجيز والمدير

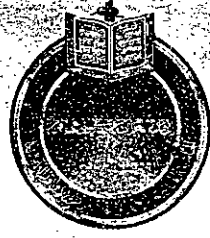
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١٢٩٥٤



دارالعلوم دارالقرآن بشار وباكستان

٣ / ١٠ / ٢٠٠١



## كشف الدرجات

2 |

امتحان التجويد وقراءة القرآن الكريم

المحافظة العامة للتربية والتعليم - دار القراء المركزية - مكة المكرمة

رقم الجلوس

رقم التسجيل ١٢٩٥٤

عام ١٤٢٢ هـ (السوي/الفرعي)

اسم الطالب مولانا عبد الكبير اسم الوالد عبد الرشيد  
تاريخ الميلاد ٢٠١٩ م المديرية - يثاوي - الصف

المادة	الدرجات	مكتسبة
الترتيل	١٠٠	٨٠
التدوير	١٠٠	٨٥
كتب التجويد جمال القرآن ، معلم التجويد فوائد مكة والمقدمة الجوزية	١٠٠	٨٠
مجموع الدرجات	٣٠٠	٢٤٥

تشهد ادارة دارالقراء المركزية بان الطالب المذكورة قد نجح في امتحان النهائي  
بتقدير محمد كرمي --- وصلى الله على سيدنا محمد وآله وصحبه وسلم

المكتب الرئيسي

تاريخ الإصدار: ٣ / ١٠ / ٢٠٢١



مكتبة القمامة للعلوم  
853171

١٢٩٥٤  
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بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاء المدارس العربية

باكستان



وزارة التربية والتعليم

## كشف الدرجات

امتحان الشهادة الثانوية العامة في العلوم الاسلامية والعربية (ميترك)

عام ١٤١١  
١٩٩١

رقم التسجيل \_\_\_\_\_ رقم الجلوس ٢٠

اسم الطالب عبد الباق اسم الوالد عبد الباق

المديرية كشمير تاريخ الميلاد ١٣٩٤ م ٧٤٤ هـ دور الاول

اسم الجامعة/المدرسة دار المعلمين كشمير

المادة	الدرجات	المادة	الدرجات
التفسير والتجويد	٤٠	الصرف	٨٩
الحديث والأدب العربي	٧٠	النحو	٥٠
الفقه	٦٤	المنطق	٦٠

الدرجة الصغرى ٤٠ - الدرجة الكبرى ١٠٠ مجموع الدرجات ٦٠٠ - الدرجات المحصلة ٣٧٨

شهادة ذرة وفاء المدارس العربية أن الطالب المذكور أعلاه قد نجح في امتحان الشهادة الثانوية العامة

بتقدير جيد جداً وصلى الله على سيدنا محمد وآله وصحبه وسلم

المكتب الرئيسي ملتان توقيع مراقب الامتحان

التاريخ ١٤١١ م ١٩٩١

ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Jamia  
Darul Uloom Karachi.  
Karachi No. 14 Pakistan  
Ph: 311217 Fax: 313535



جامعة  
دارالعلوم کراچی  
کراچی ۱۴ پاکستان  
فون ۳۱۱۲۱۷

التاريخ ۲۸/۵/۱۴۱۸ھ

## شهادة حسن السيرة

تثبت هذه الشهادة بان السيد عبد الكبر بن الحاج عبد الرشيد  
المتوطن قرية شيخ كلے، مریہ پشاور، پاکستان  
ممن تخرج عندنا و حصل النجاح في اختبار " المرحلة العالمية " بعد ما تم دراسته  
في العلوم العربية والدينية ----- وانه لم يزل ----- رعاه الله تعالى -----  
مدة اقامته في جامعة دارالعلوم كراتشي مكبا على دراسته ، جادا نشيطا وكان على  
سيرة حسنة وصير جميل - والله يتولى السرائر -

خاتم المدرسة

امين دارالعلوم كراتشي

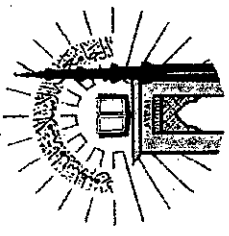


دارالعلوم كراچی

ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

الملكه من العوم شين السعورق  
وزارة التعليم العالي  
البحر العربى العربى بالذرة النورة  
وكالة الجامعة للتطوير  
عمادة خدمة المجتمع



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### شهادة مشاركة

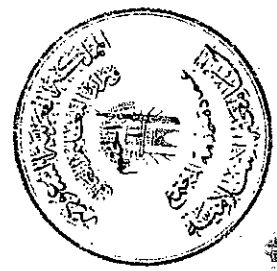
الحمد لله، والصلاة والسلام على رسول الله، وعلى آله وصحبه ومن والاه، أما بعد:

فتفريد عمادة خدمة المجتمع بالجامعة الإسلامية بالمدينة المنورة بأن:  
**عبد الكبير بن عبد الرشيد**، باكستاني الجنسية، قد شارك في برنامج تعلم اللغة العربية والثقافة الإسلامية الذي تنظمه وحدة التعليم المستمر لغير الناطقين باللغة العربية. وذلك خلال المدة من بداية العام الدراسي: (١٤٣٠/١٤٣١هـ) إلى نهاية الفصل الأول من العام الدراسي: (١٤٣١/١٤٣٢هـ).

والعمادة إذ تمنحه هذه الشهادة توصيه بتقوى الله عز وجل، وتتمنى له دوام التوفيق.

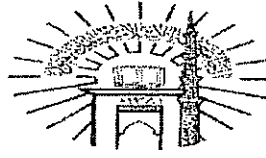
وكيل الجامعة للتطوير

إبراهيم بن علي العبيد



عميد خدمة المجتمع

أ.د. عبد الله بن سليمان الغفيلي



كشف درجات المستوى الرابع

للعام الدراسي: ١٤٣٢/٣١هـ

نتائج اختبار الفصل الدراسي: الأول

اسم الطالب: **عبد الكبير بن عبد الرشيد** الجنسية: **باكستاني**

ملاحظات	الدرجات المكتسبة		الدرجة الصغرى	الدرجة الكبرى	المواد الدراسية	م
	رقما	كتابة				
	١٠٠	مائة	٥٠	١٠٠	القرآن الكريم	١
	٨١	إحدى وثمانون	٥٠	١٠٠	التدريبات	٢
	٩٣	ثلاث وتسعون	٥٠	١٠٠	التوحيد	٣
	٩٥	خمس وتسعون	٥٠	١٠٠	القراءة	٤
	٩٧	سبع وتسعون	٥٠	١٠٠	التاريخ	٥
	١٠٠	مائة	٥٠	١٠٠	التعبير	٦
	٩٨	ثمان وتسعون	٥٠	١٠٠	التفسير	٧
	٧٦	ست وسبعون	٥٠	١٠٠	النصوص	٨
	٧٤٠	سبعمائة وأربعون	٤٠٠	٨٠٠	المجموع	
				ممتاز	السلوك	
				جيد جداً	المواظبة	
	الترتيب: الأول	النسبة المئوية: ٩٢,٠٥		التقدير: ممتاز	النتيجة: ناجح	
	أ. عبد الرحمن ريان التوقيع:	أ. هداية الرحمن كفيل التوقيع:	أ. نوح عالم عبد الستار التوقيع:			

وكيل عمادة خدمة المجتمع للشئون التعليمية

حرف في

١٥/٣/١٤٣٢هـ

د. فهد بن مطيع المغذوي

ATTESTED



## بھضور جناب سیکرٹری صاحب محکمہ اوقاف صوبہ خیبر پختونخواہ

درخواست / نمائندگی بحالی ملازمت  
سائل امام / خطبہ۔

- جناب عالی! سائل حسب ذیل عرض رساں ہے۔
- ۱۔ یہ کہ سائل محکمہ اوقاف میں بطور امام / خطیب 2002 سے مسجد تندور سازان گھنٹہ گھر پشاور شہر میں خدمات انجام دے رہا تھا۔
  - ۲۔ یہ کہ سائل بغرض حصول علم جامعہ اسلامیہ مدینہ منورہ میں داخلہ لیا اور محکمہ سے باضابطہ طور پر چھٹی لیکر مدینہ منورہ چلا گیا۔ سائل نے کورس مکمل کر کے پاکستان آیا اور باقاعدگی سے بطور امام / خطیب ڈیوٹی انجام دیا۔
  - ۳۔ یہ کہ سائل کو اپنی سند حاصل کرنے کیلئے سعودی عرب جانا ضروری تھا۔ اس لئے باقاعدہ طور پر دو ماہ چھٹی لینے کیلئے درخواست دے کر سعودی عرب چلا گیا اور سائل نے جامعہ اسلامیہ مدینہ منورہ سے اچھی خاصی پوزیشن میں سند حاصل کی۔ (نقل سند لف درخواست ہذا ہے)
  - ۴۔ یہ کہ چونکہ محکمہ کے افسران بالانے چھٹی کی درخواست نام منظور کیا اور سائل نے سند لیکر فوراً پاکستان آنا تھا، مگر بد قسمتی سے سائل کو وہاں سے پاکستان آنے میں کفیل سسٹم کی وجہ سے کافی مشکلات کا سامنا کرنا پڑا۔ جسکی وجہ سے سائل کے پاکستان آنے میں کافی دیر ہو گئی۔ جسکی وجہ سے سائل بروقت حاضر نہ ہو سکے اور سائل کی بروقت حاضر نہ ہونا قصداً عمدانہ ہے بلکہ ہوا ہے۔
  - ۵۔ یہ کہ سائل کو محکمہ نے کسی قسم کا کوئی نوٹس / سو کا نوٹس ارسال نہیں کیا ہے۔ اسلئے حکم برخاستگی قابل منسوخی ہے اور حکم برخاستگی غیر قانونی ہے۔
  - ۶۔ یہ کہ سائل مزید کوالیفیکیشن / علم حاصل کرنے کے بعد باقاعدہ طور پر محکمہ میں خدمات انجام دینے کیلئے حاضر ہوا، لیکن سائل کو معلوم ہوا ہے کہ بروئے چٹی انگریزی ازا ایڈمنسٹریٹر اوقاف پشاور سائل کو ملازمت سے برخاست کیا گیا ہے۔
  - ۷۔ یہ کہ سائل اب پہلے سے زیادہ کوالیفائیڈ ہے اور سائل بہترین طریقے سے ڈیوٹی انجام دینے کے قابل ہے۔
- لہذا استدعا ہے کہ بمظہوری درخواست ہذا سائل کو اپنی ملازمت پر بحال کرنے کا حکم صادر فرما کر دادرسی فرمائی جائے۔ سائل تاحیات دعا گور ہے گا۔

المرقوم: 17/03/2015

التحاضن

سائل :- عبدالکبیر مدنی امام / خطیب جامع مسجد تندور سازان گھنٹہ گھر پشاور۔

رابطہ نمبر: 0333-9146960

ATTESTED  
اسناد

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ANNEX D 27

Leave (2 - Palestine) ...

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Main body of handwritten text in Urdu, appearing to be a letter or report.

Handwritten text in Urdu, possibly a signature or a specific section of the document.

Handwritten text at the bottom left, possibly a date or reference.

Handwritten text at the bottom center, possibly a name.

Handwritten text at the bottom, possibly a signature or a specific section of the document.

ATTESTE ... ME ... Handwritten text and stamps at the very bottom of the page.

بخدمت جناب ایڈیٹر ط صائب محمد اوقاف لیسٹاؤر

عنوان درخواست لے ایک سال کی خصیصہ  
Ex - Pakistan Measles

جناب عالی: سوریانہ گزارش یہ ہے کہ میں محمد اوقاف کی طرف سے تندرست مسجید نزدیک گھنٹہ گھر تخریبات ہوں اور میں مدیر لیدم کے لیے سعودی عرب جانا چاہتا ہوں

لینڈ امیر بانی لکڑے سو خندہ 2010 سے 2011  
Ex - Pakistan Measles (ایک سال)

دعا جائے۔ سیری جگہ سے مولانا عزیز الرحمن کو خاتم مسجد تندرست دیوٹی کے ساتھ ساتھ امامت کی دیوٹی پر اچھی سے انجام دے گا

الحاضرین عین نوازش ہوگی

حوالہ 11 - 2010

آپ کا قوالعدار عبدالکبیر اعلم مسجید تندرست دیوٹی نزدیک گھنٹہ گھر لیسٹاؤر  
دستی ط  
ATTESTED

47/29  
28

GOVERNMENT OF NWFP  
AUQAF HAJJ RELIGIOUS AND  
MINORITY AFFAIRS DEPARTMENT.

Dated Peshawar the 18.01.2010

OFFICE ORDER

No. SO (AUQAF-I)/1-186/09. The Competent Authority has been pleased to allow 365 days Ex-Pakistan leave and NOC to Maulana Abdul Kabeer S/o Abdur Rashid, Khateeb Masjid Tandoor Sazan Peshawar with effect from 01-02-2010 to 01-02-2011 to proceed to Saudi Arabia for Dars-o-Tadrees Course.

(NAUMAN SHAH JADOON)  
SECRETARY/CHIEF ADMINISTRATOR AUQAF  
NWFP, Peshawar.

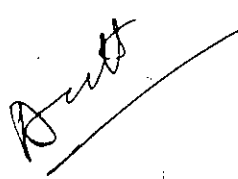
Copy forwarded to:-


- ✓ 1. Administrator Auqaf w/r to his letter NO.70/ME/Auqaf dated: 12-01-2010.
2. PS to Secretary Auqaf Hajj Religious and Minority Affairs Deptt:

  
SECTION OFFICER (AUQAF)

19/1  
19/1/10

 19-1



  
**ATTESTED**





OFFICE OF THE  
ADMINISTRATOR AUQAF  
N.W.F.P, PESHAWAR

29

No. 70 1075 /Auqaf

Dated Peshawar the 17<sup>th</sup> January, 2010

To.

The Secretary to Govt. of N-W.F.P.  
Hajj, Auqaf, Religious and Minority Affairs.  
Peshawar

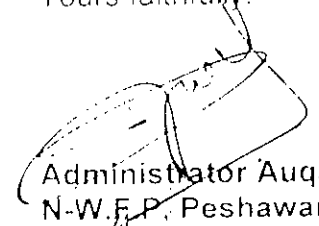
Subject: N.O.C AND GRANT OF EX-PAKISTAN LEAVE

Dear Sir,

The application (in-original) dated 04.01.2010 in respect of Maulana Abdul Kabeer S/o Abdur Rasheed, Khateeb Masjid Tandoor Sazan Peshawar City requesting for the grant of one year (365 Days) Ex-Pakistan leave with effect from 01.02.2010 to 01.02.2011 to proceed abroad for Dars-o-Tadrees course in Kingdom of Saudi Arabia.

It is requested that approval to the said leave may please be accorded and N.O.C may be issued accordingly.

Yours faithfully,

  
Administrator Auqaf,  
N-W.F.P, Peshawar

*Stamp*  
**ATTESTED**

حضرت جناب اید منسٹر اور اوقاف صوبہ خیبر پختونخواہ ایس ایس  
جناب عالی

ہو دبانہ گزارش ہے کہ بندہ کو ضروری کام

کیلئے دو مہینے کا رخصت درکار ہے

لہذا بندہ کو یکم ستمبر 2013 سے 31 اکتوبر 2013

تک رخصت عنایت فرمائیں

عین گزارش ہوگی

الغرض

عبدالکریم خطیب و امام جامعہ تہذیبیہ

گفتہ گار

عبدالکریم  
رخصت

23-8-2013

Supad / IME  
For Report  
23/8/13

24/8  
23/8/13

ATTESTED



31/6/12  
OFFICE OF THE  
ADMINISTRATOR AUQAF  
Khyber Pakhtunkhwa, Peshawar  
Eidgah Charsadda Road Peshawar  
Phone: 2043428 Fax: 2043427

No. 139 /ME / Auqaf, Dated Peshawar the 21-01-2012


To ✓

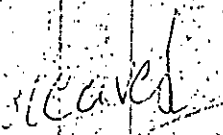
Moulana Abdul Kabir,  
Imam / Khatéeb,  
Masjid, Tandoor Sazan,  
Peshawar.

**SUBJECT: - APPLICATION FOR EXTENSION OF FURTHER LEAVE**

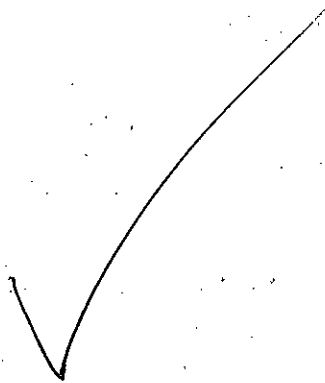
Reference your application dated 13.10.2011 on the subject noted above.

The extra leave availed w.e.f 02.02.2011 to 18.12.2011 is treated as leave without pay and you are warned to be careful in future, otherwise disciplinary action will be initiated against you.

  
(Syed Fayyaz Ali Shah)  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar  
NR

  
  
21.1.2012

  
**ATTESTED**



1256

بخدمت جناب ایڈمنسٹریٹر جنرل محکمہ اوقاف خیریتو کتب و خواہ لیساء

جناب عالی

خود بانہ گزارش ہے کہ بندہ پڑھنے کے سلسلے

میں در بندہ منورہ جانا چاہتا ہے جس کے لئے ایک

سال کی چھٹی درکار ہے۔

لکھنا بندہ کو یکم اپریل 2012 سے 31 مارچ 2013  
تک چھٹی عنایت فرمائیں۔

عین گزارش یہی

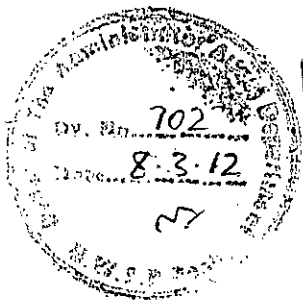
تاریخ = 8-3-2012

العارضی ر. دعوت عبدالکبیر

بندہ عبدالکبیر ولد عبدالرشید

مطیبت و انعام مسجد تندور سائز ان گھنڈ لیساء

صدر خیریتو کتب و خواہ



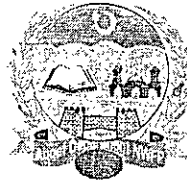
IME  
P1. P4

DAY II  
Examine & Proven

Handwritten signature and date 9/3

ATTESTED

Handwritten number 13



OFFICE OF THE  
ADMINISTRATOR AUQAF  
KHYBER PAKHTUNKHWA,  
PESHAWAR

Phone: 2043428 Fax 2043427

No. 878/ME

Dated: 13/04/2012


OFFICE ORDER


365 days leave without pay (study leave) is hereby granted to Moulana Abdul Kabir, Khateeb / Imam Masjid Tandoor Sazan, Peshawar w.e.f 01.04.2012 to 31.03.2013.

No. 878-32/ME

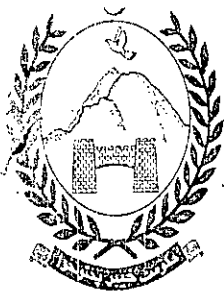
Copy forwarded to the:-

- 1- Deputy Administrator -II Auqaf, Khyber Pakhtunkhwa, Peshawar.
- 2- Accounts Officer Auqaf, Khyber Pakhtunkhwa Peshawar for information and necessary action.
- 3- Manager Auqaf concerned.
- 4- Moulana Abdul Kabir, Khateeb / Imam Masjid Tandoor Sazan, Peshawar.
- 5- Personal file.

  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

  
ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA  
AUQAF HAJJ RELIGIOUS AND MINORITY AFFAIRS DEPARTMENT  
SDU BUILDING, ATTACHED DEPARTMENT COMPLEX KHYBER  
ROAD PESHAWAR  
Auqaf@kp.gov.pk  
Fax No. 091-9212620

No. SO(Auqaf-I)/3-3/ 2014/Vol.III  
Dated Peshawar the July 30, 2015.

1396-97

To

Maulana Abdul Kabeer S/O Haji Abdul Rashid,  
Ex-Imam Masjid Tandoor Sazan, Ghanta Ghar,  
R/O Village Sheikh Killay, P/O Mathra, Peshawar.

Subject:- **APPLICATION**

I am directed to refer to your Applications dated 17-3-2015 and to state that the competent authority has rejected your application being not covered under the Rules/policy.

*(Signature)*  
(SYED WAQAR HUSSAIN)  
SECTION OFFICER (AUQAF)  
Ph No. 091-9223505

Endst. No. & Date as above

Copy forwarded to the:

PS to Secretary, Auqaf, Hajj, Religious & Minority Affairs Department.

SECTION OFFICER (AUQAF)

*(Signature)*  
ATTESTED

ANNEX-E 35

تاریخ: 14-09-13

پشاور

نمبر 3098-100 / 1015 / 1015

منجانب: ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخوا، پشاور

برائے: مولانا عبدالکبیر،  
امام مسجد تندور سازان، پشاور

عنوان: ڈیوٹی سے مسلسل غیر حاضری

آپ کو مطلع کیا جاتا ہے کہ زیر دستخطی کو باخبر ذرائع سے معلوم ہوا ہے کہ آپ گذشتہ ڈیڑھ سال سے اپنے  
ڈیوٹی سے غیر حاضر ہے۔ اور محکمہ ہذا کے اجازت کے بغیر بیرون ملک چلے گئے ہیں۔

اس سلسلے میں بذریعہ نوٹس ہذا آپ کو ہدایت کی جاتی ہے کہ ایک ہفتہ کے اندر اندر اپنے طویل غیر حاضری  
کیوجہ بتائیں۔ بصورت دیگر آپ کے خلاف قانونی کارروائی عمل میں لائی جائیگی۔ جس میں آپ کی ملازمت سے برطرفی  
بھی شامل ہے۔

تاکید جانیں۔

ایڈمنسٹریٹر اوقاف  
صوبہ خیبر پختونخوا، پشاور

نمبر 3098-100 / 1015

کاپی برائے اطلاع و ضروری کارروائی:

(1) اکاؤنٹس آفیسر اوقاف خیبر پختونخوا، پشاور برائے ضروری کارروائی۔

(2) متعلقہ ڈیپارٹمنٹ، پشاور

ایڈمنسٹریٹر اوقاف  
صوبہ خیبر پختونخوا، پشاور

ATTESTED



ATTESTED

*(Handwritten signature)*

۲۹ اپریل ۲۰۱۹ء  
موسم بنیادی  
۱۰۰

موسم بنیادی کے ذریعے...  
موسم بنیادی کے ذریعے...  
موسم بنیادی کے ذریعے...  
موسم بنیادی کے ذریعے...  
موسم بنیادی کے ذریعے...

موسم بنیادی کے ذریعے

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موسم بنیادی کے ذریعے

موسم بنیادی کے ذریعے

PF/ME 225-A

۲۹-۰۱-۲۰۱۹

*(Handwritten signature)*

پشاور مولانا 9-9-2013

نمبر- 15.59/A رادقاف PF/MF

منجانب: ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخواہ، پشاور

برائے: مولانا عبدالکبیر،  
امام مسجد تندور سازان، پشاور

عنوان: ڈیوٹی سے مسلسل غیر حاضری

بحوالہ آپ کی درخواست بتاریخ 23.08.2013 برائے 2 مہینے چھٹی از 01.09.2013 تا  
31.10.2013 جو کہ زیر دستخطی نے نامنظور کیا ہے۔ اور آپ بغیر اجازت اور NOC بیرون ملک چلے گئے ہیں۔ جس کی  
وجہ سے فی الحال آپ کی ماہانہ تنخواہ بند کی جاتی ہے۔  
لہذا آپ کو ہدایت کی جاتی ہے کہ اپنی غیر حاضری کی وجہ بتائیں بصورت دیگر آپ کے خلاف مروجہ قانون  
کے تحت کارروائی عمل میں لائی جائیگی۔

ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخواہ، پشاور  
۸۴

ATTEST

## نوٹس غیر حاضری

38

آپ مولانا عبدالکبیر، امام مسجد تندورسازان سبزی منڈی چوک یادگار، پشاور مورخہ 01.09.2013 سے مسلسل اپنی ڈیوٹی سے غیر حاضر ہے۔ جس کے بارے میں آپ کو کئی بار اپنی ڈیوٹی پر حاضری کا نوٹس جاری کیا جا چکا ہے۔ مگر آپ کی طرف سے کوئی جواب موصول نہیں ہوا اور زبردستی سختی کے نوٹس میں یہ بات لائی گئی ہے کہ آپ بغیر اطلاع بیرون ملک چلے گئے ہیں۔

اسلئے آپ کو بذریعہ اشتہار ہذا مطلع کیا جاتا ہے کہ آپ ایک ہفتہ کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور اپنی غیر حاضری کی وجہ بیان کریں ورنہ آپ کے خلاف قانونی کارروائی عمل میں لائی جائیگی۔ جس میں آپ کی نوکری سے برخاستگی بھی شامل ہے۔

ایڈمنسٹریٹو آفیسر،

خیبر پختونخواہ (عیدگاہ) چار سده روڈ، پشاور

ATTESTED

REGISTERED

O.P.S.S.

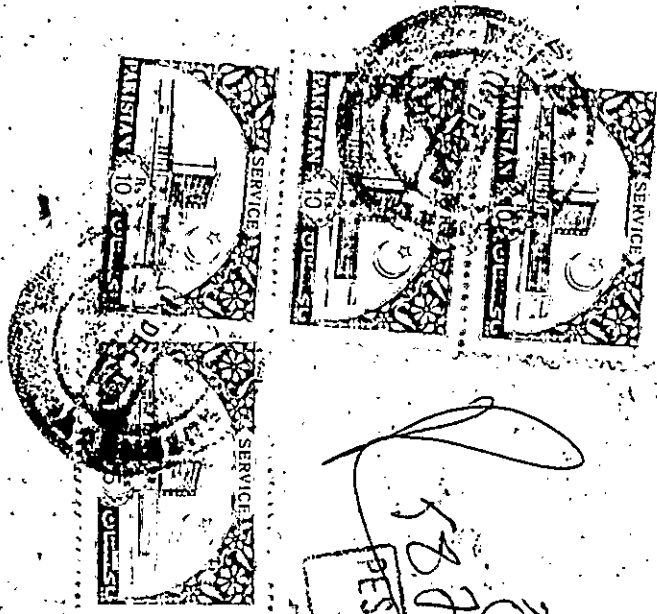
موروثیہ کے لئے رجسٹرڈ اور پوسٹ شدہ

سید محمد سعید علی صاحب مدظلہ العالی

کراچی

TESTED

587  
PESHAWAR KUTCHERY  
PESHAWAR



Despatched  
Office of the Administrator  
Anqal, M. W. B. D. Peshawar  
Dated 11-12-2014

http://www.dailymashriq.com.pk

اللہ ہی کیلئے ہیں مشرق و مغرب القرآن

**DAILY MASHRIQ PESHAWAR**

روزنامہ  
عہدہ کے بانی  
سید تاج میر شاہ  
پشاور

**مشرق**

مسلطہ اشاعت کے 48 سال

پشاور اسلام آباد سبیک وقت شائع ہونے والا کثیر الاشاعت قومی اخبار

ABC CERTIFIED

جلد 48

شمارہ 45

سنگ 4 ذی الحجہ 1435ھ 30 ستمبر 2014ء 17 اسون قیمت 12 روپے

**نوٹس غیر حاضری**

آپ مولانا عبدالکبیر، امام مسجد تندورسازان بہری منڈی چوک یادگار پشاور مورچہ  
01.09.2013 سے مسلسل اپنی ذیوبی سے غیر حاضر ہے۔ جس کے بارے میں  
آپ کو کئی بار اپنی ذیوبی پر حاضری کا نوٹس جاری کیا جا چکا ہے۔ مگر آپ کی طرف سے  
کوئی جواب موصول نہیں ہوا اور زبردستی کے نوٹس میں یہ ثابت لائی گئی ہے کہ آپ  
بغیر اطلاع بیرون ملک چلے گئے ہیں۔  
اسلئے آپ کو بذریعہ اشتہار بندھا گیا جاتا ہے کہ آپ ایک ہفتہ کے اندر اندر اپنی  
ذیوبی پر حاضر ہو جائیں اور اپنی غیر حاضری کی وجہ بیان کریں ورنہ آپ کے خلاف قانونی  
کارروائی عمل میں لائی جائیگی۔ جس میں آپ کی نوکری سے ہر خالصتی بھی شامل ہے۔

ایڈمنسٹریٹو اوقاف

خیبر پختونخواہ (عید گاہ) چار سمدہ روڈ، پشاور

*Supplied  
For news properly.*

1-10-14

IME  
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11/10

پشاور  
ATTESTED



GOVT. OF KHYBER PAKHTUNKHWA  
AUQAF, HAJJ, RELIGIOUS & MINORITY AFFAIRS DEPARTMENT  
"Promotion of Religious Activities in Khyber Pakhtunkhwa"



Awards this Certificate to

Mr. Mawlana Abdul Kabir

For participation in the  
Two Days Workshop on

"دهشت گردی اور فرقہ واریت کی روک تھام میں علماء کا کردار"

Held at Auqaf Auditorium  
Eidgah Charsadda Road, Peshawar

January 09-10, 2012

Noorul Hadi

Deputy Secretary (Admin)  
Auqaf, Hajj, Religious &  
Minority Affairs Department

Ahmad Hassan

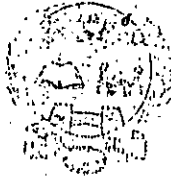
Secretary to Govt. of Khyber Pakhtunkhwa  
Auqaf, Hajj, Religious &  
Minority Affairs Department

ATTESTED

Handwritten signature and initials (MI) on the right side of the certificate.

ANNEXURE 79

42



OFFICE OF THE  
ADMINISTRATOR AUQAF  
KHYBER PAKHTUNKHWA  
PESHAWAR  
Phone: 961 0000

No: 3899-4003  
Dated: 11-19-2014

OFFICE ORDER

In pursuance of Secretary/Chief Administrator Auqaf Khyber Pakhtunkhwa letter No. SO(Auqaf-I)3-3/2014/438-39, dated 03.12.2014 Maulana Abdul Kabeer, Imam/Khateeb Masjid Tandoor Sazan, Peshawar is hereby removed from service due to wilful absence from duty under Rule 11(a) of West Pakistan Auqaf Department (Khateeb & Imam) Service Rules, 1968 with immediate effect.

Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

No 4003/1015-

Copy forwarded to the:

1. P.S to Secretary Auqaf, Hajj, Religious & Minority Affairs Department Khyber Pakhtunkhwa, Peshawar w/r to his letter quoted above.
2. Deputy Administrator-I & II Auqaf, Khyber Pakhtunkhwa, Peshawar
3. Accounts Officer Auqaf, Khyber Pakhtunkhwa, Peshawar.
4. Area Manager Auqaf, Peshawar.
5. Maulana Abdul Kabeer, Imam/Khateeb Masjid Tandoor Sazan, Peshawar.

o/c

Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

OFFICE OF THE  
ADMINISTRATOR AUQAF  
KHYBER PAKHTUNKHWA, PESHAWAR  
No.3999-4003  
Dated: 11.12.2014

OFFICE ORDER:-

In pursuance of Secretary/Chief Administration Auqaf Khyber Pakhtunkhwa letter No.SO(Auqaf-1)3-3/2014/4-38-39, dated Maulana Abdul Kabeer, Imam/Khateeb Masjid Tandoor Sazan, Peshawar is hereby removed from service due to willful absence from duty under Rule 11(a) of West Pakistan Auqaf Department (Khateeb & Imams) Service, Rules, 1968 with immediate effect.

Sd/-  
Administration Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

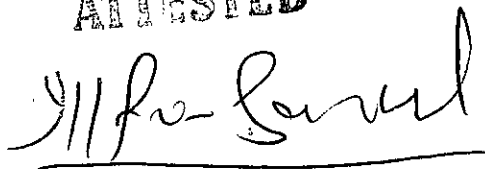
No.4003/1105

Copy forwarded to the:-

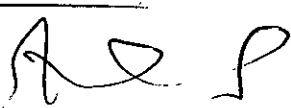
1. PS to Secretary Auqaf, Hajj, Religious & Minority Affairs Department Khyber Pakhtunkhwa, Peshawar w/r to his letter quoted above.
2. Deputy Administrator-I & II, Auqaf, Khyber Pakhtunkhwa, Peshawar
3. Accounts Officer Auqaf, Khyber Pakhtunkhwa, Peshawar.
4. Area Manager Auqaf, Peshawar.
5. Maulana Abdul Kabeer, Imam/Khateeb Masjid Tandoor Sazan, Peshawar

Sd/-  
Administration Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

ATTESTED

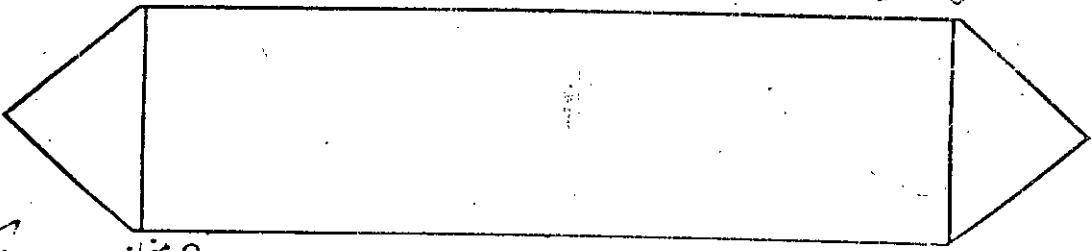
  

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بعدالت سرسٹریٹول KPK لاہور



2 پنجاب  
مولانا کبیر  
بنام  
ولہ عم الرشد

مورنہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریراً نکتہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آج کے مقام پر لیٹیٹر کیلئے الطاف صاحب ایڈووکیٹ سرسٹریٹول

مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز کو  
وکیل صاحب کو راضی نامہ کرنے و تقررات ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور یا کسان  
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زر این پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ  
پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تمارت پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ مندر ہے۔

المرقوم \_\_\_\_\_ ماہ \_\_\_\_\_ 20

بمقام نعتیہ سیر کے لئے منظور ہے۔

رجحہ  
سید الکی

Accepted  
Said  
As

مولانا کبیر  
بنام  
ولہ عم الرشد

تعمیرات  
10 سبے



27252

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

رابطہ نمبر:

بعدالت جناب: **حمیدہ پختونخوا سروس ٹریبونل پشاور**

منجانب: <b>حورنا عبدالکبیر</b>	دعویٰ:
	علت نمبر:
انڈسٹریل ڈویلپمنٹ اور کانسٹریکشن کمیشن، خیبر پختونخوا	موضوع:
وغیرہ	جرم:
	تھانہ:

### بابت تحریرانکہ

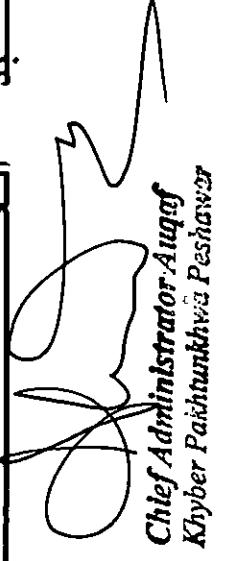
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پوری وجوہ دی کاروائی متعلقہ  
آن مقام **لیسٹڈ ڈیولپمنٹ کمیشن** **حضرت عبدالکبیر** کو وکیل مقرر  
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو  
راضی نامہ کرنے و تقریر نمائندگی و فیصلہ برطاعت دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق  
زریں ہر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پوری یا کسی ایک طرف یا اہل کار کی برآمدگی اور منسوخی، نیز  
دائر کرنے اہل کار کی نظر ثانی و پوری کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
کاروائی کے واسطے اور وکیل یا کارکن قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب  
مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا مانتا ہوا اختیار منظور و قبول ہوگا دوران مقدمہ  
میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وکیل کے لئے منظور ہوگا کوئی تاریخ پیشی مقام  
دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پوری یا جزوی یا مانتا ہوا اختیار کریں، لہذا ادکالت نامہ لکھ دیا تاکہ مندر ہے۔

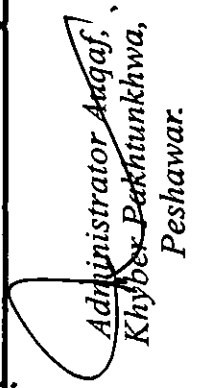
المرقوم: 25 نومبر 2015

مقام **سروس ٹریبونل پشاور** کے لئے منظور ہے۔

Accepted

نوٹ: اس کالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

  
Chief Administrator Aaqaf  
Khyber Pakhtunkhwa Peshawar

  
Administrator Aaqaf,  
Khyber Pakhtunkhwa,  
Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Appeal No. 999/2015.

Maulana Muhammad Abdul Kabir.....Appellant.

Vs

Administrative Auqaf, Government of Khyber Pakhtunkhwa  
Eidgah Charsadda Road, Peshawar and others.....Respondents.

**Reply on behalf of respondent No. 3.**


**Preliminary Objections:-**

1. That the appellant has no cause of action.
2. That the appellant has no locus standi.
3. That the appeal is time barred.
4. That the appellant has joinder and mis-joinder of the necessary parties.

**Respectfully Sheweth+**

Para 1 to 13: It is submitted that being an administrative matter, it relates to respondent No. 1 & 2, and they are in a better position to satisfy the grievances of the appellant. Besides, the appellant has raised no grievances against respondent No.3 i.e. Accountant General Khyber Pakhtunkhwa office.

Keeping in view the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondent No. 1 & 2, for the satisfaction of his grievances and the appeal in hand may be dismissed with cost.

  
ACCOUNTANT GENERAL  
KHYBER PAKHTUNKHWA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 999/2015.

Maulana Muhammad Abdul Kabir.....Appellant.

Vs

Administrative Auqaf, Government of Khyber Pakhtunkhwa  
Eidgah Charsadda Road, Peshawar and others.....Respondents.

Reply on behalf of respondent No. 3.


Preliminary Objections:-

1. That the appellant has no cause of action.
2. That the appellant has no locus standi.
3. That the appeal is time barred.
4. That the appellant has joinder and mis-joinder of the necessary parties.

Respectfully Sheweth+

Para 1 to 13: It is submitted that being an administrative matter, it relates to respondent No. 1 & 2, and they are in a better position to satisfy the grievances of the appellant. Besides, the appellant has raised no grievances against respondent No.3 i.e. Accountant General Khyber Pakhtunkhwa office.

Keeping in view the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondent No. 1 & 2, for the satisfaction of his grievances and the appeal in hand may be dismissed with cost.

  
ACCOUNTANT GENERAL  
KHYBER PAKHTUNKHWA.

999/16 M.M. Abdul Kabir

I received a sum of  
Rs. 1000 in the Court  
in the above noted cases

عبد کابیر  
محمد

22-7-16

22/7/16

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

In Re: Service Appeal no.999\2015

Maulana Muhammad Abdul Kabir.....Appellant

Versus


Administrator Auqaf, and others..... Respondents

REPLY ON BEHALF OF RESPONDANT NO.1,2,4 to 7

Respectfully Sheweth:

Preliminary Objections:

- 1.That the appellant has no cause of action and or locus standi to file the instant appeal.
- 2.That the appellant is not civil servant hence can not approach this honorable tribunal and the appeal is thus not maintainable and is therefore, liable to summary dismissal.
- 3.That the appeal of the appellant is false, frivolous, malafide, vexatious, based on fraud and has been filed to blackmail and harass the answering respondent.
- 4.That the appellant is estopped by his own acts and conduct to file the instant appeal.
- 5.That the appeal is badly time barred.
- 6.That the appellant has not come to this honourable tribunal with clean hands and has suppressed material facts about his own conduct from this Honourable tribunal.



**On Facts**

1. Para-1 is subject to proof.

2. Para-2 needs no reply.

3&4. In reply to Para-3&4 of the appeal regarding performance of the appellant it is submitted that the appellant has earlier remained absent from duty without obtaining leave.

5. Para-5&6 are wrong. The appellant has earlier remained absent from duty without obtaining leave.

7&8. In reply to Para-7&8 it is submitted that the appellant vide his application dated 04.01.2010 was earlier granted Ex-Pakistan 365 days leave through order dated 18.01.2010 from 01.02.2010 to 01.02.2011 but after the expiry of leave the appellant instead of joining the service moved different applications for extension of leave however the appellant joined the duty on 19.12.2011. Thereafter over and above days absentia period from 02.02.2011 to 15.12.2011 was treated as leave without pay and also warning was issued to the appellant through order dated 21.01.2012 which speaks about his dedication to duty.

The appellant after two and half months again submitted an application on 08.03.2012 for grant of 365 days Ex-Pakistan leave which were approved vide office order dated 13.04.2012 and the appellant joined the duty on 01.04.2013. The appellant again submitted an application on 23.08.2013 for grant of two months earned leave which was regretted through order dated 09.09.2013.

9&10. Para-9 &10 are wrong and incorrect. The appellant was properly served through numerous notices and publication in the Newspaper but he avoided appearance and willfully absented himself from sacred duty.

11. Para-11 has no relation with the present controversy however the same is subject to proof.

12&13. In reply to Para-12 it is submitted that the appellant was terminated from service after fulfilling all codal formalities and the appellant was aware of the proceeding against him but he willfully absented himself from duty and the appeal is time barred.

**Grounds:**

1 to 34. Grounds 1 to 34 are wrong and incorrect. Proper inquiry has been conducted and even then there was no need to conduct inquiry because absence of the appellant from duty is admitted fact. All actions of the respondent are in accordance with law.

3

It is, therefore, respectfully prayed that on acceptance of this Written reply this Honorable Tribunal may please be dismissed the appeal of the appellant with costs.

*Nasir Mahmood*

Respondent no.1,2,4 to 7

Through

*Nasir Mahmood*

Nasir Mahmood Advocate  
Supreme Court of Pakistan  
13-D Haroon Mansion  
Khyber Bazar, Peshawar.

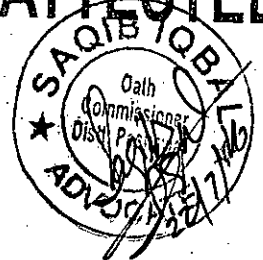
AFFIDAVIT

I do hereby declare and affirm on oath that contents of the above written reply are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable tribunal.

*Nasir Mahmood*

Deponent

ATTESTED





BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

In Re: Service Appeal no.999\2015

Maulana Muhammad Abdul Kabir.....Appellant

Versus

Administrator Auqaf, and others.....Respondents

REPLY TO THE APPLICATION FOR CONDONATION OF DELAY  
ON BEHALF OF RESPONDANT NO.1,2,4 to 7

Respectfully Sheweth:

Preliminary Objections:

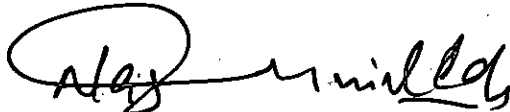
- 1.That the appellant has no cause of action and or locus standi to file the instant application.
- 2.That the application is not maintainable in its present form and is therefore, liable to summary dismissal.
- 3.That the application is false, frivolous, malafide, vexatious, based on fraud and has been filed to blackmail and harass the answering respondents.
- 4.That the applicant is estopped by his own acts and conduct to file the instant application.
- 5.That the appeal is badly time barred and no sufficient cause has been shown in the application.
- 6.That the appellant has not come to this honourable tribunal with clean hands and has suppressed material facts about his own conduct from this Honourable tribunal.

5

**On Facts**

1. Para-1 needs no reply.
2. Para-2 is wrong and incorrect.
3. No valuable rights of the appellant are involved and he is responsible for his own misdeeds.
- 4&5. Para-4&5 is wrong and incorrect.
6. Para-6 is wrong and incorrect.

It is, therefore, respectfully prayed that on acceptance of this reply this Honorable Tribunal may please be dismissed the application along with appeal of the appellant with costs.



Respondent no.1,2,4 to 7

Through

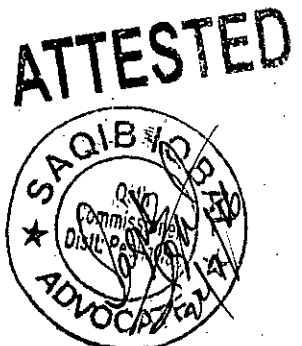


Nasir Mehmood Advocate  
Supreme Court of Pakistan  
13-D Haroon Mansion  
Khyber Bazar, Peshawar.

**AFFIDAVIT**

I do hereby declare and affirm on oath that contents of the above written reply are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable tribunal.

  
Deponent



6

DEER

/1(c)5/Auqaf dated 12.01.2002. Abdul Kabeer  
Haji Abdur Rashid r/o Chaikh Kali P.O. Mathra  
Peshawar District Peshawar who has

reported his arrival in pursuance of this department offer letter  
No. 315 /1(c)5/Auqaf dated 12.01.2001 is hereby  
appointed as Imam/Khateeb (BPS-12) in Tandoor Sazan  
Peshawar City.

w.e.f. the date of arrival.  
His services will be governed by the following terms and  
conditions :-

1. His appointment will be on a probation for a period of two years.
2. He will be allowed BPS-12 plus usual allowances as admissible under the rules.
3. He shall be governed by such rules and orders as prescribed by the Govt/Auqaf Department from time to time and the Efficiency and Discipline Rules 1973 etc.
4. His service shall be liable to termination at any time without assigning any reason on one month notice.
5. In case he wishes to resign he will serve one month notice or in lieu thereof one month pay shall be forfeited.
6. He should produce medical fitness certificate within 15 days, failing which the appointment order will be considered as cancelled.

— Sol —  
Administrator Auqaf,  
N.W.F.P., Peshawar.

Endst No. 323-27/11/05  
Cop forwarded to the:-

1. Member Board of Revenue/Chief Administrator Auqaf, NWFP.
2. Dy Administrator-I & II Auqaf, NWFP.
3. Accounts Officer Auqaf, NWFP.
4. Manager Auqaf Peshawar.

5. Official concerned.

Administrator Auqaf,  
N.W.F.P., Peshawar.

مکتوبہ: وزارت امور خارجہ، پاکستان  
کراچی

خبر انٹرنیٹ

خبردار: وزیر امور خارجہ، پاکستان  
کراچی

مکتوبہ: وزارت امور خارجہ، پاکستان  
کراچی

مکتوبہ: وزارت امور خارجہ، پاکستان  
کراچی

مکتوبہ: وزارت امور خارجہ، پاکستان  
کراچی

مکتوبہ: وزارت امور خارجہ، پاکستان  
کراچی

مکتوبہ: وزارت امور خارجہ، پاکستان  
کراچی

8

20

GOVERNMENT OF NWFP  
AUQAF HAJJ RELIGIOUS AND  
MINORITY AFFAIRS DEPARTMENT.

Dated Peshawar the 18.01.2010

OFFICE ORDER

No. SO (AUQAF-I)/1-186/09. The Competent Authority has been pleased to allow 365 days Ex-Pakistan leave and NOC to Maulana Abdul Kabeer S/o Abdur Rashid, Khateeb Masjid Tandoor Sazan Peshawar with effect from 01-02-2010 to 01-02-2011 to proceed to Saudi Arabia for Dars-o-Tadrees Course.

(NAUMAN SHAH JADOON)  
SECRETARY/CHIEF ADMINISTRATOR AUQAF  
NWFP, Peshawar.

Copy forwarded to:-

- ✓ 1. Administrator Auqaf w/r to his letter NO.70/ME/Auqaf dated: 12-01-2010.
- 2. PS to Secretary Auqaf Hajj Religious and Minority Affairs Deptt:



*(Signature)*  
SECTION OFFICER (AUQAF)

*(Signature)*  
19-1

*(Signature)*

9) خدمت جناب ایڈمنسٹریٹر بڑے اوقاف صوبہ سرحد

جہانم، ہال .

جو آریز گزارش ہے کہ بندہ یکم فروری 2010 سے

31 جنوری 2011 تک ایک سال چھ لیکر بڑھنے کے سلسلہ

میں مدینہ منورہ میں مقیم ہے اور ابھی یہ سلسلہ جاری ہے

جس کے لئے فی الحال بندہ کو مزید 6 مہینے یعنی یکم فروری 2011

سے 31 جولائی 2011 تک چھ کی ضرورت ہے۔

لہذا یہی سے بندہ آپ کی خدمت میں درخواست ارسال

کر رہا ہے۔ لظ شفقّت فرما کر بندہ کی درخواست

منظور فرمائیں۔

بندہ تاحیات دعا گو رہے گا۔

الحارث عبدالکبیر ولد عبدالرشید

اقام و خطب محکمہ اوقاف

صوبہ سرحد پاکستان

عبدالکبیر

14-1-2011

FROM

FAX NO. :

Jul 11 21 2009 07:43

10



OFFICE OF THE  
ADMINISTRATOR AUQAF  
Khyber Pakhtunkhwa Peshawar  
Eidgah Charsadda Road Peshawar  
Phone: 2043428 Fax: 2043427

No. 305 /ME /Auqaf

Dated Peshawar the, 29 / 01 /2011

To  
The Secretary to Government of Khyber Pakhtunkhwa,  
Auqaf, Hajj, Religious & Minority Affairs Department,  
Peshawar.

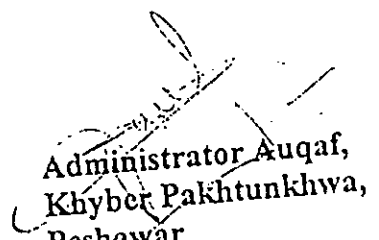
Subject:- GRANT OF STUDY LEAVE

Dear Sir,

The application (in original), Dated 14.01.2011, submitted by Maulana Abdul Kabeer S/O Abdur Rasheed, Khateeb Masjid Tandor Sazan, Peshawar City requesting for further grant of six months study leave w.e.f. 01.02.2011 to 31.07.2011, who has already proceeded for Dars-o-Tadrees Course in Kingdom of Saudi Arabia. It is to mention here that the Competent Authority has already sanctioned one year (365 days) study leave w.e.f. 1.2.2010 to 1.2.2011.

It is, requested that necessary approval for grant of six month study leave may kindly be accorded.

Yours faithfully,

  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

11

29



OFFICE OF THE  
ADMINISTRATOR AUQAF  
Khyber Pakhtunkhwa Peshawar  
Eidgah Charsadda Road Peshawar  
Phone: 2043428 Fax: 2043427

No. 1286 / ME / Auqaf

Dated Peshawar the 14 / 04 / 2011

To

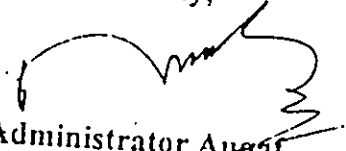
The Secretary to Government of Khyber Pakhtunkhwa,  
Auqaf, Hajj, Religious & Minority Affairs Department,  
Peshawar.

Subject:- GRANT OF STUDY LEAVE

Dear Sir,

Kindly refer to this office letter No. 305/ME, dated 29.01.2011 (Copy enclosed)  
which is self-explanatory, the requisite approval is still awaited.

Yours faithfully,

  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

6/1



12

39



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
AUQAF HAJJ RELIGIOUS AND  
MINORITY AFFAIRS DEPARTMENT

No.SO (Auqaf-I) 1-186/2008/Vol:2  
Dated Peshawar 20<sup>th</sup> May, 2011 11645-47

To

The Administrator Auqaf  
Khyber Pakhtunkhwa Peshawar.

Subject: GRANT OF STUDY LEAVE

I am directed to enclose herewith a copy of Section Officer (FR) Finance Department letter No.SO(FR)FD/5-14/2010/Vol-II dated 14.05.2011 on the subject noted above and state that requisite information/documents in respect of Maulana Abdül Kabeer may please be furnished to this department for onward submission to the quarter concerned for further process of the case.

The matter may be treated as urgent.

Encl: as above.

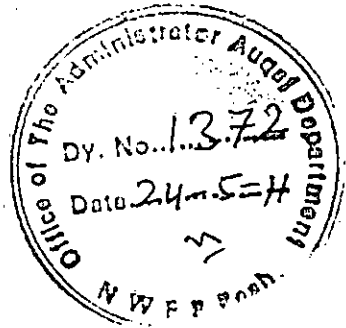
*(Signature)*  
(AMIR SYED HUSSAIN SHAH)  
SECTION OFFICER (AUQAF)

Endst: of even No. & date.

Copy forwarded to:-

1. PS to Minister Auqaf, Hajj, Religious and Minority Affairs Khyber Pakhtunkhwa
2. PS to Secretary Auqaf, Hajj, Religious & Minority Affairs Deptt.

SECTION OFFICER (AUQAF)



*(Signature)*  
26/5

IME  
P...  
26/5

*(Signature)*

13



OFFICE OF THE  
ADMINISTRATOR AUQAF  
Khyber Pakhtunkhwa, Peshawar  
Eidgah Charsadda Road Peshawar  
Phone: 2043428 Fax: 2043427

No. 1872 ME / Auqaf, Dated Peshawar the 02/05/2011.

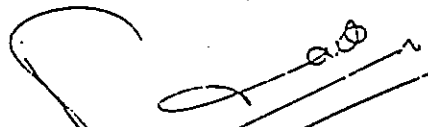
To  
The Secretary / Chief Administrator Auqaf,  
Khyber Pakhtunkhwa, Peshawar

Subject: - GRANT OF STUDY LEAVES

Dear Sir,

Reference letter No. SO (Auqaf-I) 1-186 / 2008 / Vol: 2 / 1645-47,  
dated 20-05-2011 on the subject noted above.

The relevant information are sent herewith as desired please.

  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar  
2/6/2011

ok

حکومت جناب ایڈمنسٹریٹر ہونہ خیر پستو گواہ

جناب عالی

ہو اُدبانہ گزارش ہے کہ بندہ یکم فروری 2011 سے چھٹی لیک

پڑھنے کے سلسلے میں مدینہ منورہ میں مقیم ہے۔ اور ابھی یہ

سلسلہ جاری ہے جس کیلئے منید چھٹی کی ضرورت ہے۔

لہذا بندہ کو رولز مطابق فی الحال کے سپینے یعنی یکم اگست

سے 31 دسمبر 2011 تک چھٹی عنایت فرمائیں۔

بندہ ڈاک کے ذریعے درخواست ارسال کر رہا ہے۔

اسکو منظور فرمائیں

بندہ تمام زندگی اور خصوصاً مدینہ منورہ میں آپ اور اپنے

بچوں کیلئے دعا کرتا رہیگا۔

الغرض

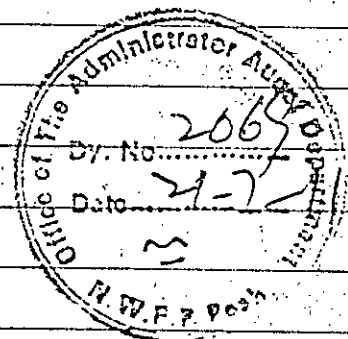
عبدالکبیر ولد عبدالرشید

امام و خطیب فکھ او قاف <sup>صاحب تندرستی</sup> DA-II

صوبہ خیر پستو گواہ پاکستان

عبدالکبیر

14-7-2011



1-ME

20/7

Handwritten signature

15

52



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
AUQAF HAJJ RELIGIOUS AND  
MINORITY AFFAIRS DEPARTMENT

No.SO (Auqaf-I) 1-186/2008/Vol:2  
Dated Peshawar 28<sup>th</sup> July, 2011

2635-36

To  
The Administrator Auqaf  
Khyber Pakhtunkhwa Peshawar.

Subject: GRANT OF STUDY LEAVE

Reference to your letter No.2320/ME/Auqaf dated 04.07.2011 on the subject noted above.

It is requested to provide the following details in respect of Maulana Abdul Kabeer:-

- i. Position of leave account.
- ii. Is sufficient leave available at his credit?

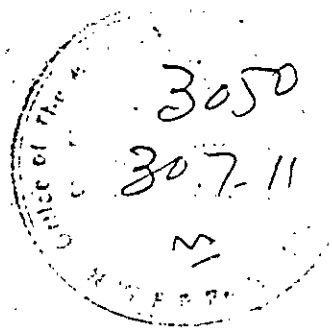
*Syed Hussain*  
(AMIR SYED HUSSAIN SHAH)  
SECTION OFFICER (AUQAF)

Endst: of even No. & date.

Copy forwarded to:-

PS to Secretary Auqaf, Hajj, Religious & Minority Affairs Deptt.

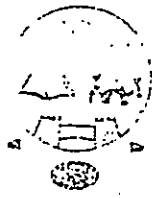
SECTION OFFICER (AUQAF)



~~DA-II~~

*[Signature]*  
1/8

1ME  
3  
3/8



OFFICE OF THE  
ADMINISTRATOR AUQAF  
KHYBER PAKHTUNKHWA, PESHAWAR

16

No. 3011 / Auqaf. Dated Peshawar the 25-08-2011

To  
The Secretary / Chief Administrator Auqaf,  
Khyber Pakhtunkhwa, Peshawar

**SUBJECT: -GRANT OF STUDY LEAVE**

Kindly refer to your officer letter No. SO(Auqaf-I) 1-186/2008/Vol:2/2635-36,  
dated 28.07.2011 on the subject noted above.

It is submitted that Moulana Abdul Kabir has availed of 127 days leave over  
and above his leave account. There is no leave available at his credit

(Syed Fayyaz Ali Shah)  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

a/c

17



GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
AUQAF HAJJ RELIGIOUS AND  
MINORITY AFFAIRS DEPARTMENT

No.SO (Auqaf-I) 1-186/2008/Vol:2/3149-5  
Dated Peshawar 16<sup>th</sup> September, 2011

To

The Administrator Auqaf  
Khyber Pakhtunkhwa Peshawar.

Subject: GRANT OF STUDY LEAVE

I am directed to refer to your letter No.3011/ME/Auqaf dated 25.08.2011 on the subject noted above and to state that leave availed by Maulana Abdul Kabeer i.e. 127 days over and above his leave account may be considered as extra ordinary leave without pay. He may be advised to report for duty with immediate effect without fail otherwise, strict disciplinary action under law/rules may be initiated against him.

It is, therefore, requested that immediate necessary action may be taken in the matter under intimation to this department.

*(Signature)*  
(AMIR SYED HUSSAIN SHAH)  
SECTION OFFICER (AUQAF)

16/9 (1040)

Endst: of even No. & date.

Copy forwarded to:-

1. PS to Minister Auqaf, Hajj, Religious and Minority Affairs Khyber Pakhtunkhwa
2. PS to Secretary Auqaf, Hajj, Religious & Minority Affairs Deptt.

SECTION OFFICER (AUQAF)

4389  
17/9/11

*3A/II* *IME*  
*is desired*

19/9

18

57

OFFICE OF THE  
ADMINISTRATOR  
Khyber Pakhtunkhwa  
Peshawar

No. 3207 MS/99

Dated Peshawar the 26-09-2011

Maulana Abdul Kabir, Imam / Knateeb,  
Masjid Tandoor Sazan Peshawar

SUBJECT: - GRANT OF STUDY LEAVE

It is submitted that according to your leave account you are availed 127 days leave over and above and the competent authority has considered as extra ordinary leave without pay.

Therefore you are directed to report for duty with immediate effect without any further delay otherwise disciplinary action will be taken against you under the rule.

(Syed Fayyaz Ali Shah)  
Administrator Auzaf,  
Khyber Pakhtunkhwa,  
Peshawar

No. 3208-09/MC  
Copy forwarded to the:-

- 1- P.S. to Minister Auzaf, Hajj, Religious and Minority Affairs, Khyber Pakhtunkhwa, Peshawar.
- 2- P.S. to Secretary Auzaf, Hajj, Religious and Minority Affairs, Khyber Pakhtunkhwa, Peshawar.

o/e  
Administrator Auzaf,  
Khyber Pakhtunkhwa,  
Peshawar

بخدمت جناب منظم اوقاف صاحبہ صوبہ خیبر پختونخواہ

درخواست ممبر اد عطائیں تویح رحلت جناب عالی!

مؤدبانہ گزارش ہے کہ فدوی محکمہ ہذا کی اجازت سے

جامعہ یونیورسٹی قدینہ منورہ سعودی عرب میں داخلہ لیا ہے۔

مدہ نے سرپرستی لینے کی درخواست دی ہے جو تا حال منظور نہ ہوئی اور محکمہ آڈیٹر / M/F / 3207 مورخہ 26/9/2011 کے ذریعہ <sup>نہیں</sup> فیصلی

ڈاکرنا اور محکمہ ہذا میں رپورٹ کرنا کا حکم نامہ جاری کیا ہے۔

چونکہ بندہ باقاعدہ اجازت لیکر مذکورہ جامعہ میں تکمیل کورس کیلئے داخلہ لے چکا ہے اور حصول سند (ڈگری) میں ابھی صرف 3 مہینے باقی ہیں

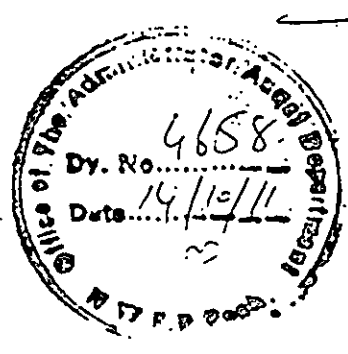
لہذا اگر آپ صاحبان 20/12/2011 تک بندہ کی رحلت میں

توسیع کے امکانات صادر فرماویں تو بندہ کیلئے تکمیل کورس کی کارروائی موقع کریم ہوگا اور بندہ مقامات مقدمہ میں اور روضہ رسول مدائن

آب کو اپنے حصولی دعاؤں میں یاد کریگا

الحاصل: مولانا عبدالکبیر اہم / خطیب مسجد تندورستان سہیل پور

مورخہ 11/10/2011



DAY-II

IME  
2  
17/10





20

59

OFFICE OF THE  
ADMINISTRATOR AUQAF  
Khyber Pakhtunkhwa, Peshawar  
Eidgah Charsadda Road Peshawar  
Phone: 2043428 Fax: 2043427

No. 5018 IME/PE / Auqaf. Dated Peshawar the 30-11-2011.

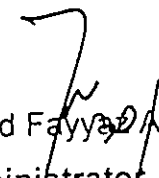
To

Mr. Abdul Kabir,  
Imam / Khateeb,  
Masjid Tandoor Sazan,  
Peshawar.

**SUBJECT: APPLICATION FOR FURTHER EXTENSION OF 3 MONTHS LEAVE**

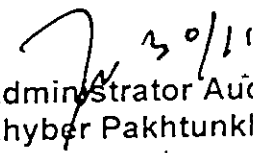
I am directed to refer to your application dated 13.10.2011 on the subject noted above and to say that your application for further extension of 3 months leave has been regretted.

You are, therefore, directed to report for duty within 07 days, failing which strict disciplinary action will be taken against you under the rules.

  
(Syed Fayyaz Ali Shah)  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

No. 5019/ME

Copy forwarded to the P.S to Secretary for Auqaf, Hajj, Religious and Minority Affairs, Khyber Pakhtunkhwa, Peshawar with reference to his letter No. SO(Auqaf-I) 1-186/2008/Vol:2 (copy enclosed).

  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

(21)

گدبنت صاحب ایڈمنسٹریٹر اوقاف صوبہ خلیفہ جتو خواہ لہذا  
عنوان جاہری رپورٹ

صناب عالی

گندہ کس ہے کہ سائل کو دفتر فون نمبر 051 505 505 505

فوجیل پو جبکہ مطابق آج سے اپنا ڈیوٹی برطرف

ہو کہ باقاعدہ اپنا کام شروع کر دیا لہذا اظہاراً عرض

عین لو ارس ہستی

خوشہ 19-12-2012

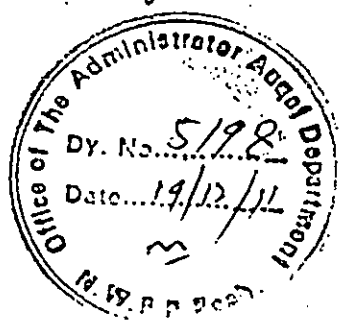
آپ کا ایچ حکم سائل جلالا عند ابکیر

خطیب و امام

مسجد تندو سبازان لیس اور

DA-II / IME

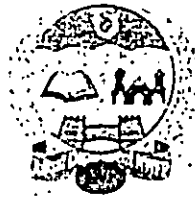
20/12



Received  
20/12

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22



OFFICE OF THE  
ADMINISTRATOR AUQAF  
Khyber Pakhtunkhwa, Peshawar  
Eidgah Charsadda Road Peshawar  
Phone: 2043428 Fax: 2043427

No. 139 / 1ME / Auqaf, Dated Peshawar the 21-01-2012

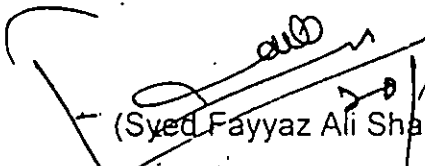
To

Moulana Abdul Kabir,  
Imam / Khateeb,  
Masjid, Tandoor Sazan,  
Peshawar.

**SUBJECT: - APPLICATION FOR EXTENSION OF FURTHER LEAVE**

Reference your application dated 13.10.2011 on the subject noted above.

The extra leave availed w.e.f 02.02.2011 to 18.12.2011 is treated as leave without pay and you are warned to be careful in future, otherwise disciplinary action will be initiated against you.

  
(Syed Fayyaz Ali Shah)  
Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar

کامیاب  
عبدالکابیر  
21-1-2012  
w/c

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6-11  
7-11

حضرت جناب اید منسٹر بیڈر فیکلٹی ادقاف خیبر پختونخواہ

جناب عالی :

خود پائے گزارش ہے کہ بندہ پڑھنے کے لیے  
میں مدینہ منورہ جانا چاہتا ہے جس کے لئے ایک  
سال کی چھٹی درکار ہے۔

لکھنا بندہ کو یکم اپریل 2012 سے 31 مارچ 13  
تک چھٹی عنایت فرمائیں۔

عین نوازش بدی

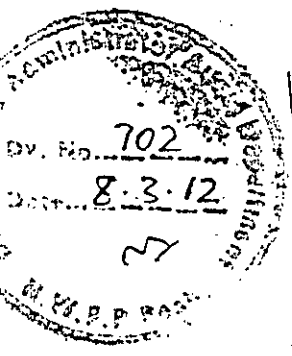
دورہ = 2012-3

العارضی ر. دعوت عبداللہ

بندہ عبدالکبیر ولد عبدالرشید

خطیب و امام مسجد تندورستان گھنڈہ

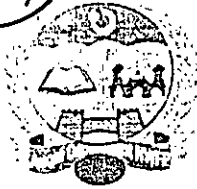
صوبہ خیبر پختونخواہ



IME  
PI-14  
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DAF II  
Examine & Assess  
9/3

24



OFFICE OF THE  
ADMINISTRATOR AUQAF  
KHYBER PAKHTUNKHWA  
PESHAWAR.

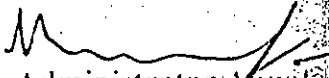
Phone: 2043128 Fax 24152

No: 828/ME

Dated: 13/04/2012

OFFICE ORDER


365 days leave without pay (study leave) is hereby granted to Moulana Abdul Kabir  
Khateeb / Imam Masjid Tandoor Sazan, Peshawar w.e.f 01.04.2012 to 31.03.2013.

  
Administrator Auqaf  
Khyber Pakhtunkhwa  
Peshawar

No 828-32/ME

Copy forwarded to the:-

- 1- Deputy Administrator -II Auqaf, Khyber Pakhtunkhwa, Peshawar.
- 2- Accounts Officer Auqaf, Khyber Pakhtunkhwa Peshawar for information and necessary action.
- 3- Manager Auqaf concerned.
- 4- Moulana Abdul Kabir, Khateeb / Imam Masjid Tandoor Sazan, Peshawar.
- 5- Personal file.

  
Administrator Auqaf  
Khyber Pakhtunkhwa  
Peshawar

o/c

حکومت چنا ب ایڈمنسٹریٹر اوقاف صوبہ خیبر پختونخواہ  
عنوان، حاضری رپورٹ

چنا ب عالی

مؤدبانہ گزارش ہے کہ سائل بحوالہ 1/32/32-8  
کے مطابق 2012-4-1 تا 2013-3-31 ایک سال چھٹی گزار  
لائی ڈیوٹی پر حاضر ہیں۔

لہذا حاضری رپورٹ میں صرفت چھ مہینہ نوازش ہوگی

العارضہ 1.

حواضہ

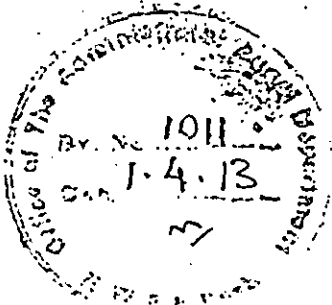
عبدالکبیر

خطیب و امام جامع مسجد شہر دہرا  
گھنڈہ گھر سیدی لڑہہ دیباور

Handwritten signature and date 1/4/13

رجسٹرڈ

1.4.13



حضرت جناب ایدہ منیر شاہ اوقاف صوبہ خیبر پختونخواہ

جناب عالی

موجودہ بانڈ گزارش ہے کہ بندہ کو ضروری کام

کندے ہوئے کارِ خیرت درکار ہے

لہذا بندہ کو یک ستمبر 2013 سے 31 اکتوبر 2013

تک، خیرت عنایت فرمائیں

عینہ زبیر شاہ

الغرض

Suppl / IMF  
for report

عبدالباقی خطیب و امام جامعہ

گفندہ شاہ

23/8/13

23-8-2013

24/8/13

27

پشاور مورخہ 2013-9-9

نمبر- 1559/A اوقاف PF/ME

مخانب: ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخواہ، پشاور

برائے: مولانا عبدالکبیر،  
امام مسجد تندورسازان، پشاور

عنوان: ڈیوٹی سے مسلسل غیر حاضری

بحوالہ آپ کی درخواست بتاریخ 23.08.2013 برائے 2 مہینے چھٹی از 01.09.2013 تا  
31.10.2013 جو کہ زبردستی نے نام منظور کیا ہے۔ اور آپ بغیر اجازت اور NOC بیرون ملک چلے گئے ہیں۔ جس کی  
وجہ سے فی الحال آپ کی ماہانہ تنخواہ بند کی جاتی ہے۔  
لہذا آپ کو ہدایت کی جاتی ہے کہ اپنی غیر حاضری کی وجہ بتائیں بصورت دیگر آپ کے خلاف مروجہ قانون  
کے تحت کارروائی عمل میں لائی جائیگی۔

ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخواہ، پشاور  
۱۴



پشاور مورخہ 29-01-2014

نمبر 225-A اوقاف PF/ME

منجانب: ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخواہ، پشاور

برائے: مولانا عبدالبکیر،  
امام مسجد تندور سازان، پشاور

عنوان: ڈیوٹی سے مسلسل غیر حاضری

زیر تخطی کو اطلاع دی گئی ہے اور ساتھ ہی ایریا منیجر نے بھی رپورٹ دی ہے کہ آپ اپنے ڈیوٹی سے مسلسل غیر حاضر ہے۔ جس کے بارے میں آپ کو پہلے سے مطلع کیا جا چکا ہے کہ آپ اپنی غیر حاضری کی معقول وجہ بتائیں۔ مگر آپ کی طرف سے اب تک کوئی جواب موصول نہیں ہوا۔

اس لئے آپ کو بذریعہ نوٹس ہذا ایک بار پھر مطلع کیا جاتا ہے کہ آپ مذکورہ بالا وجوہات کی تحریری طور پر دفتر ہذا کو وضاحت ارسال کریں ورنہ آپ کے خلاف یکطرفہ قانونی کارروائی عمل میں لائی جائیگی۔ جس میں آپ کو نوکری سے برخاست بھی کیا جاسکتا ہے۔

ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخواہ، پشاور  
۱۱۲

تاریخ: 14-09-09

پشاور

نمبر: 3098-150 / 1505 اوقاف (ک) 1

منجانب: ایڈمنسٹریٹر اوقاف،  
صوبہ خیبر پختونخوا، پشاور

برائے: مولانا عبدالکبیر،  
امام مسجد تندور سازان، پشاور

عنوان: ڈیوٹی سے مسلسل غیر حاضری

آپ کو مطلع کیا جاتا ہے کہ زبردستی کو باخبر ذرائع سے معلوم ہوا ہے کہ آپ گذشتہ ڈیڑھ سال سے اپنے ڈیوٹی سے غیر حاضر ہے۔ اور محکمہ ہذا کے اجازت کے بغیر بیرون ملک چلے گئے ہیں۔

اس سلسلے میں بذریعہ نوٹس ہذا آپ کو ہدایت کی جاتی ہے کہ ایک ہفتہ کے اندر اندر اپنے طویل غیر حاضری کی وجہ بتائیں۔ بصورت دیگر آپ کے خلاف قانونی کارروائی عمل میں لائی جائیگی۔ جس میں آپ کی ملازمت سے برطرفی بھی شامل ہے۔  
تاکید جائیں۔

ایڈمنسٹریٹر اوقاف  
صوبہ خیبر پختونخوا، پشاور

نمبر: 3098-150 / 1505

کاپی برائے اطلاع و ضروری کارروائی:

(1) اکاؤنٹس آفیسر اوقاف خیبر پختونخوا، پشاور برائے ضروری کارروائی۔

(2) متعلقہ منیجر اوقاف، پشاور

ایڈمنسٹریٹر اوقاف  
صوبہ خیبر پختونخوا، پشاور

پشاور ایبٹ آباد اسلام آباد اور کراچی سے بیک وقت شائع ہونے والا کثیر الاشاعت قومی روزنامہ

روزانہ کلن کی ضمانت آج کا سب سے

روزنامہ

پشاور  
پاکستان

ایڈیٹر  
عبدالواحد یوسفی

صفحہ 12

جلد 25 | سیکل 30 | ستمبر 2014 | 4 ذی الحجہ 1435 | 12 ستمبر 2014 | شمارہ 262

★  
★  
★  
★

### نوٹس غیر حاضری

آپ مولانا عبدالکبیر، امام مسجد درسا زمان سبزی منڈی چوک یادگار پشاور موروثی  
01.09.2013 سے مسلسل اپنی ذیوبی سے غیر حاضر تھے۔ جس کے بارے میں  
آپ کو کئی بار اپنی ذیوبی پر حاضری کا نوٹس جاری کیا جا چکا ہے۔ مگر آپ کی طرف سے  
کوئی جواب منسوب نہیں ہوا اور زبردستی کے نوٹس میں یہ بات لائی گئی ہے کہ آپ  
بغیر اطلاع بیرون ملک چلے گئے ہیں۔  
اسلئے آپ کو بذریعہ اشتہار بڑا مطلع کیا جاتا ہے کہ آپ ایک ہفتہ کے اندر حاضر اپنی  
ذیوبی پر حاضر ہو جائیں اور اپنی غیر حاضری کی وجہ بیان کریں ورنہ آپ کے خلاف قانونی  
کارروائی عمل میں لائی جائے گی۔ جس میں آپ کی نوکری سے برخواستگی بھی شامل ہے۔

ایڈیٹر مسٹر اوقات

خیبر پختونخوا (عمیر گاہ) جارسدہ روڈ، پشاور

http://www.dailymashriq.com.pk

اللہ ہی کیلئے ہیں مشرق و مغرب القرآن

**DAILY MASHRIQ PESHAWAR**

روزنامہ  
عہدہ کے بانی  
سید تاج میر شاہ  
پشاور

**مشرق**

سلسلہ اشاعت کے 48 سال

پشاور اور اسلام آباد سبیک ڈیٹ شائع ہونے والا کثیر الاشاعت قومی اخبار

ABC CERTIFIED

جلد 48

شمارہ 45

مئی 4 ذی الحجہ 1435ھ 30 ستمبر 2014ء 17 سوچ قیمت 12 روپے

**نوٹس غیر حاضری**

آپ مولانا عبدالمکبر، امام مسجد تندورستان ہری منڈی چوک یادگار پشاور نورخ  
01.09.2013 سے سلسلہ اپنی ذیوبنی سے غیر حاضر ہے۔ جس کے بارے میں  
آپ کو کسی بار اپنی ذیوبنی پر حاضری کا نوٹس جاری کیا جا چکا ہے۔ مگر آپ کی طرف سے  
کوئی جواب موصول نہیں ہوا اور زبردستی کے نوٹس میں یہ بات لائی گئی ہے کہ آپ  
بغیر اطلاع ہی دن ملک چلے گئے ہیں۔  
اسلئے آپ کو بذریعہ اشتہار بذا مطلع کیا جاتا ہے کہ آپ ایک ہفتہ کے اندر واپس اپنی  
ذیوبنی پر حاضر ہو جائیں اور اپنی غیر حاضری کی وجہ بیان کریں ورنہ آپ کے خلاف قانونی  
کارروائی عمل میں لائی جائیگی۔ جس میں آپ کی نوکری سے برخواستگی بھی شامل ہے۔

ایڈمنسٹریٹو اوقات

خیبر پختونخواہ (عیدگاہ) چارسدہ روڈ، پشاور

*Support  
follow properly*

1-10-14

*IME  
13  
11/10*

32



OFFICE OF THE  
ADMINISTRATOR AUQAF  
KHYBER PAKHTUNKHWA

Eidgah Charsadda Road, Peshawar  
Phone: 2043428 Fax: 2043427

74

No. 3420/10251

Dated 12-11-2014

To: The Secretary to Govt. of Khyber Pakhtunkhwa  
Auqaf, Hajj, Religious & Minority Affairs Department,  
Peshawar.

Subject: WILFUL ABSENT FROM DUTY  
Dear Sir,

It is submitted that Maulana Abdul Kabir, Imam/Khateeb of Auqaf Masjid Tandoor Sazan, Peshawar city has been absent from duty since 01.09.2013. It has been reported that he has proceeded abroad without availing NOC and Ex-Pakistan Leave.

This office has already issued three notices to the said Imam to attend his duty.  
(copies enclosed)

A final notice has also been published in two leading National/Local newspapers daily Mashriq & daily Aaj, but no reply has so far been received from the defaulting person. (copy enclosed).

Keeping in view the above his service may be dispensed with under Sub-rule (2) of Rule. 13 of the West Pakistan (Imam & Khateeb) Service Rules, 1968.

The case is sent herewith for approval please.

Yours faithfully,

Administrator Auqaf  
Khyber Pakhtunkhwa,  
Peshawar.

O/C

33



Government of Khyber Pakhtunkhwa  
Auqaf, Hajj Religious & Minority Affairs Department  
SDU Building, Attached Department's Complex, Khyber Road, Peshawar  
Auqaf@kp.gov.pk

No. SO (Auqaf-I) 3-3/2014 / 4438-38  
Dated Peshawar, the 03<sup>rd</sup> December, 2014

To

The Administrator Auqaf,  
Khyber Pakhtunkhwa,  
Peshawar.

Subject: WILLFUL ABSENCE FROM DUTY.

I am directed to refer to your letter No. 3680/1 (c)5/Auqaf dated 12.11.2014 on the subject noted above and to state that major penalty of Removal from Service under Rule 11(a) of West Pakistan Auqaf Department (Khateeb & Imams) Service Rules, 1968, is hereby imposed on Maujan Abdul Kabeer, Imam/Khateeb of Auqaf Masjid, Tanoor Sazan, Peshawar City on account of wilful absence from duty.

*[Signature]*  
8-12-2014

(MISS HINA SAEED)  
SECTION OFFICER (AUQAF)  
Ph: 091-9223499

Endst: of even No. & date.

Copy forwarded for information to the:-  
PS to Secretary Auqaf, Hajj, Religious & Minority Affairs Department.

SECTION OFFICER (AUQAF)

3521  
9/12/14  
KPK

*[Signature]*  
A/O  
Process  
4-12-14

IME / *[Signature]*  
Assist for P.F  
& Pay bill.  
9/12/14  
A/O  
5/12/14  
A/O

**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

In re:

S.A.No. \_\_\_\_\_/2015

Maulana Muhammad Abdul Kabir

VERSUS

Administration Auqaf, Govt. of KPK, Eidgah Charsadda  
Road, Peshawar and others

**REJOINDER ON BEHALF OF PETITIONER**

*Respectfully Sheweth:-*

**PRELIMINARY OBJECTIONS**

Para 1 to 6 are totally incorrect, malafidely, without lawful authority, concealment of fact, void ab-initio with unbalanced intellectual.

**ON FACTS**

Para 1 to 12 are totally incorrect, malafidely, without lawful authority, concealment of fact, void ab-initio with unbalanced intellectual, and that of appeal are correct.

**GROUND**

Para 1 to 34 are totally incorrect, malafidely, without lawful authority, concealment of fact, void ab-initio with unbalanced intellectual, and that of appeal are correct.

Again the appellant with the permission of the department go for to the Islamic Education to Holly Saudi Arabia, with their permission, he completed his religious study, no one else in the concentered department got such a unique Arabic Qualification on such pay scale, appellant not served at all, where he goes for his higher studies, knowing that the appellant is not in Pakistan, at least they should have to serve in concerned place where he worked for study.

And Again

When the appellant in a study country complete his study, it is with their permission and previously by their extension of time

too without any pay with his own pay and cost, where the education is a basic right of every citizen and obtaining of degree is continuous of study, how on earth they without any notice outs him from the job, when his-self not caused any loss to the concerned department.

And Again

It is said in Holly Word and one of the sign of the Judgment Day is that, there is no respect of a man of religious, when the person got incarceration, jail, for not their fault, without any wrong by Saudi Arabia.

And Again

The entry in the study country is within his domain, when his visa and passport is held by the concerned authority, Government, it is impossible for me to give my rejoining report in time.

It is, therefore, humbly prayed that on acceptance of this rejoinder, appeal of the appellatant may graciously be accepted.

Appellant

Maulana Muhammad Abdul Kabir

Through

Altat Samad Advocate

Supreme Court of Pakistan

Cell: 0333-9127292

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Deponent



**BEFORE THE SERVICE TRIBUNAL, KPK PESHAWAR**

S.A.No. \_\_\_\_\_/2015

Maulana Muhammad Abdul Kabir.....Appellant

**VERSUS**

Administration Auqaf, Govt. of KPK,  
Eidgah Charsadda Road, Peshawar and others.....Respondents

**APPLICATION FOR CONDONATION OF  
DELAY IN FILING OF INSTANT APPEAL**

Respectfully Sheweth:

1. That the instant appeal is being filed before this Hon'ble Tribunal wherein no date of hearing has been fixed so far.
2. That the appellant got the re-occurring cause of action.
3. That the valuable rights of the appellant are involved.
4. That there is no bar to file the instant application.
5. That the contents of this application may kindly be considered part and parcel of main writ petition.
6. That the appellant belongs to poor family having limited resources, and if any delay cause may kindly be condoned in the interest of justice.

It is, therefore humbly prayed that, on acceptance of this application, any delay, latches in filing of instant appeal may graciously be condoned.

Appellant

Maulana Muhammad Abdul Kabir

Through

Altaf Samad Advocate

Supreme Court of Pakistan

**AFFIDAVIT**

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Deponent