

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 263/2019

Date of Institution ... 21.02.2019

Date of Decision ... 16.09.2021

Gul Naz W/O Parvez Khan R/o Mashan Khel, Urmar Payan, Peshawar.

... (Appellant)

VERSUS

Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar
and four others..

... (Respondents)

YOUSAF ALI
Advocate

... For Appellant

JAVED ULLAH,
Assistant Advocate General

... For Respondents No. 1 & 5

JAN MUHAMMAD,
Advocate

... For respondents No. 2 & 3

SALAH-UD-DIN
ATIQ-UR-REHMAN WAZIR

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):- Brief facts of the case are that the appellant was appointed as Primary School Teacher (BPS-12) vide order dated 25-08-2016. After taking over charge, the issue of her date of birth erupted as the appellant was holding two identity cards, where date of birth was different from each other, in one card the date of birth was recorded as 08-01-1982, while in another card, the date was written as 08-01-1978. Her date of birth in Secondary School

Certificate was also recorded as 09-01-1978. Due to the aforementioned reason, salary of the appellant was withheld till resolution of such issue. The appellant filed appeal in civil court but the same was withdrawn with permission of the court to file afresh because of legal impediments: The appellant filed writ petition No. 5721-P/2018 before the august Peshawar High Court, which was dismissed being not maintainable with the direction to appellant to seek such remedy from the proper forum, hence the appellant filed the instant service appeal with prayers to direct the respondents to correct the date of birth of the appellant as 08-01-1982 in the entire record of the appellant with further prayers that OR to direct the respondents to release the monthly salaries of the appellant from the date of her appointment till the time, the grievance of the appellant has been redressed by a proper forum, continuously and without any break, subject to performance of her duty.

02. Learned counsel for the appellant has contended that withholding the monthly salary of the appellant on dubious ground of date of birth of the appellant is unjust and illegal, as the appellant is performing her duty and keeping in view the principle, where there is a duty, there is salary; that mentioning double date of birth and issuing two identity cards to some extent is a matter of routine, but in the instant case withholding of salary of the appellant is of a grave concern; that there is no fault on part of the appellant, rather the date of birth of the appellant has been mixed and mingled by the respondents by mentioning two date of births of the appellant; that salary of the appellant has been withheld for no good ground, which is illegal as the appellant is continuously performing her duty without any break; that both the issues need urgent resolution, as the appellant is suffering from no fault of her.

03. Learned Assistant Advocate General appearing on behalf of respondents has contended that the appellant applied to the post of PST on provisional certificate of SSC holding her date of birth as 08-01-1982 alongwith her ID card also holding the

same date of birth; that after verification of her antecedents, it came to surface that her original Metric certificate is having date of birth as 08-01-1978 and for which she subsequently obtained another ID Card holding the date of birth as 08-01-1978, which made her record dubious; that an inquiry has also been conducted to this effect, which reveals that she procured her appointment on the basis of date of birth i.e. 08-01-1982, but her original date of birth reflected in her original Metric certificate, NADRA record as well as in Register Dakhil Kharij is 08-01-1978; that the appellant concealed the facts, hence her appeal being baseless may be dismissed with costs.

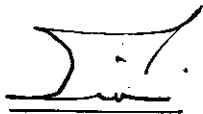
4. Notices were issued to the respondents, who submitted their comments.

05. We have heard learned counsel for the parties and have perused the record. Record reveals that the appellant procured her appointment as PST (BPS-12) on the basis of her provisional certificate of metric, where her date of birth was recorded as 08-01-1982. On verification, it came to surface that her original date of birth was 08-01-1978, hence her salary was withheld and she was afforded the opportunity to resolve the issue of her date of birth. The appellant filed a civil suit dated 27-09-2017 before the senior civil judge Mardan for correction of her date of birth. Record is silent as to what happened to such civil suit, but as per stance of the appellant, the subject suit was withdrawn, but no such order is available on record. The appellant subsequently approached the honorable Peshawar High Court through WP No. 5721-P/2018, which was dismissed vide judgment dated 13-12-2018 for want of jurisdiction with the direction to the appellant to approach the proper forum. We have observed that prayer of the appellant is twofold i.e. release of her salary and correction in date of birth. The former surely falls under the jurisdiction of this Tribunal but the later does fall under the jurisdiction of civil court. In such a situation, this Tribunal is not in a position to dilate upon the issue of salary, as the issue of

correction of date of birth would need to be resolved first and once the issue of date of birth is resolved, the issue of salary would gain finality either way.

06. In view of the foregoing discussion, the instant appeal stands dismissed being not maintainable. The appellant shall, however be at liberty to approach proper forum for resolution of the issue of her date of birth. The appellant after resolution of the issue of her date of birth may approach this Tribunal for redressal of her grievance regarding her salary, if the need so arises. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
16.09.2021



(SALAH-UD-DIN)
MEMBER (JUDICIAL)



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

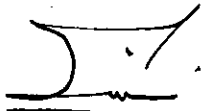
16.09.2021

Mr. Yousaf Ali, Advocate, for the appellant present. Mr. Javed Ullah, Assistant Advocate General for respondents No. 1 & 5 present. Mr. Jan Muhammad, Advocate for respondents No. 2 & 3 present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal stands dismissed being not maintainable. The appellant shall, however be at liberty to approach proper forum for resolution of the issue of her date of birth. The appellant after resolution of the issue of her date of birth may approach this Tribunal for redressal of her grievance regarding her salary, if the need so arises. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

16.09.2021



(SALAH-UD-DIN)
MEMBER (JUDICIAL)




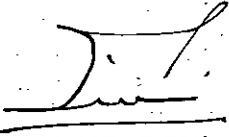
(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

14.09.2021

Mr. Yousaf Ali, Advocate, for the appellant present. Mr. Javed Ullah, Assistant Advocate General for respondents No. 1 & 5 present. Mr. Jan Muhammad, Advocate, for respondents No. 2 & 3 present.

Arguments heard. To come up for order before the D.B on 16.09.2021.


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

01.04.2021

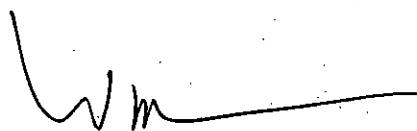
Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General alongwith Shahid Anwar ADO (Litigation) for respondents No.1 & 5 present. Counsel for respondents No.2 & 3 present.

Respondents No.2 & 3 have submitted an application for setting aside ex-parte proceedings on 11.01.2021 which application was not objected to, hence, ex-parte proceedings initiated against respondents No.2 & 3 stand set aside.

Today, an application was submitted on behalf of respondent No.1 for setting aside ex-parte proceedings which is also accepted and accordingly ex-parte proceedings stand set aside against respondent No.1 who also relied on the comments filed on behalf of respondent No.5. Respondent No.4 has already been placed ex-parte, therefore, attendance is complete but reply/comments on behalf of respondents No.2 & 3 still awaited, therefore, learned counsel present before the Bench, is directed to submit comments on behalf of respondents No.2 & 3 on the next date of hearing.

To come up for submission of comments on behalf of respondents No.2 & 3 on 15/07 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

15.07.2021

Nemo for the appellant. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents No. 1 & 5 present. Mr. Jan Muhammad, Advocate, on behalf of respondents No. 2 & 3 present and submitted written reply on behalf of the said respondents, which is placed on file.

Notice for prosecution of the instant appeal be issued to the appellant as well as her counsel and to come up for arguments before the D.B on 14.09.2021.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

26.10.2020

Appellant is present through representative.

Mr. Kabir Ullah Khattak learned Additional Advocate General present. Nemo for respondents No.1 to 4.

Respondent No.5 has already submitted comments.

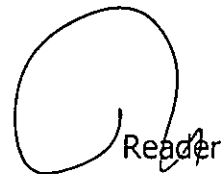
On the preceding date, respondents No.1 to 4 were not present, therefore, notices were issued but they are absent once again. Hence they are proceeded against ex-parte. File to come up for rejoinder, if any and arguments on 30.12.2020 before D.B.



(Rozina Rehman)
Member (J)

30.12.2020

Due to summer vacation, case is adjourned to 01.04.2021 for the same as before.



Reader

09.07.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Arshid Ali ADEO, for the respondents present.

Written reply on behalf of respondents is still awaited. Again, a request was made for adjournment in order to furnish written reply/comments. Another last opportunity is granted. To come up for written reply/comments on 08.09.2020 before S.B.

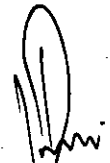


Member (J)

08.09.2020

Junior to counsel for the appellant and Addl. AG alongwith Arshad, ADEO for respondent No. 5 present. Nemo for respondents No. 1 to 4.

Representative of respondent No. 5 has furnished reply, which is placed on record. Notices be issued to respondents No. 1 to 4 for submission of reply/comments on 26.10.2020 as last chance .



Chairman

17.12.2019

Junior to counsel for the appellant, Addl. AG for respondents present.

Learned AAG seeks time to contact the respondents and furnish the requisite reply/comments. Adjourned to 29.01.2020 on which date reply/comments shall positively be submitted.

Chairman



29.01.2020

Nemo for the appellant. Written reply not submitted. Arshid Ali ADO representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 05.03.2020 before S.B. Notice be issued to the appellant for the date fixed.

Member

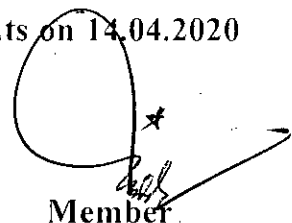


05.03.2020

Junior to counsel for the appellant present. Nemo for the respondents. Fresh notices be issued to them by way of last chance.

To come up for written reply/comments on 14.04.2020 before S.B.

Member



14.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 09.07.2020 for the same. To come up for the same as before S.B.

Reader



263/2019

19.09.2019

Counsel for the appellant present.

When attention of learned counsel was invited to terms and conditions contained in appointment order dated 26.09.2016 wherein, the appointment of appellant and others is noted to be on contract basis, he requested for time to prepare the brief regarding the maintainability of appeal in hand.

Adjourned to 07.11.2019 before S.B.

Chairman 

07.11.2019

Counsel for the appellant present.

Learned counsel, at the very outset, produced copy of notification dated 13.03.2018 issued by the District Education Officer (F) Peshawar whereby the contract service of appellant was regularized. The notification is made part of the record.

It is the case of appellant that since her initial appointment she has not been paid any salary till date on the flimsy ground that her date of birth, as noted in her CNIC, was distinct then the one contained in another CNIC in the name of appellant. It is contended that she had been performing duty regularly since the date of her appointment on contract i.e. 26.09.2016 and, as such, the respondents are obligated under the law and Constitution to pay monthly salary to the appellant.

In view of the available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all just ~~and~~ exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 17.12.2019 before the S.B.

Alongwith the appeal an application for interim relief has also been made. Notice of the application be given to the respondents for the date fixed.

Chairman 

Appellant Deposited
Security and Process Fee
7/11/19

03.05.2019

Mr. Pervez Khan, husband of appellant present.

Request for adjournment is made as learned counsel for the appellant is not available due to demise of his mother.

Adjourned to 24.06.2019 before S.B.


Chairman

24.06.2019

Appellant in person present and seeks adjournment as her counsel is not in attendance. Adjourn. To come up for preliminary hearing on 01.08.2019 before S.B.


Member

01.08.2019



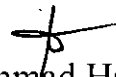
Appellant absent. Learned counsel for the appellant absent. Appellant be noticed for 19.09.2019. Adjourn. To come up for preliminary hearing on the date fixed before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 263/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/2/2019	<p>The appeal of Mst. Gul Naz presented today by Mr. Yousaf Ali Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 21/2/19</p>
2-	02.04.2019	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>2-4-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present and seeks adjournment as he has not prepare the case. Adjourned to 03.05.2019 for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 263 /2018

Gul NazAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Mineral and others.....Respondents

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5.	Copy of the appointment order dated 25.08.2016	C	11-13
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Dated:

Appellant
Through

Yousaf Ali 

&

Behzad Haider.
Advocates Peshawar

Murad Ali 

Advocate

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 263 2018/19

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 24524

Dated 21/2/2019

Gul Naz W/o Parvez Khan
R/o Mashan Khel, Urmar Payan, Peshawar.

..... Appellant

Versus

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Chairman Board of Intermediate & Secondary Education, Peshawar.
- 3) Controller of Examination, BISE, Peshawar.
- 4) Director General, NADRA, Khyber Pakhtunkhwa
- ✓5) District Education Officer (F), Peshawar.

..... Respondents

Appeal u/s 4 of KPK Service Tribunal Act, that the Date of Birth of the appellant be corrected as 08.01.1982 with further direction for insertion of this correct Date of Birth in the entire record of the appellant or direct the respondent No.5 to release and pay the monthly salaries of the appellant from the date of her appointment till the time the grievance of the appellant has been redressed by a proper forum continuously and without any break, subject to performance of her duties.

Filed to-day

Registrar

21/2/19

Respectfully Sheweth:

The Appellant submits as under:-

- 1) That, the appellant is a bonafide resident of Tehsil & District Peshawar and have unfortunately and inadvertently or in other words through innocent mistake was issued two ID Cards by respondent No.4, wherein, in one ID Card the Date of Birth of the appellant has wrongly been mentioned as 08.01.1978 bearing one and same number. (Copies of ID Cards of the appellant are Annex "A & A/1" respectively)
- 2) That after passing SSC examination, respondents No.2 & 3, issued Provisional Certificate to appellant, which also bears Date of Birth of the appellant as 08.01.1982. (Copy of the Provisional Certificate is Annex "B")
- 3) That it is pertinent to mention here that the appellant's first ID Card which contained the Date of Birth of the appellant as 08.01.1982 has also been issued by the respondent No.4 on the basis of authentic documents, therefore, the correct Date of Birth of the appellant be considered as 08.01.1982 for the reasons, because all the subsequent documents issued by either of the respondents contained the Date of Birth of the appellant as 08.01.1982.
- 4) That, meanwhile, the respondent No.5 invited application through press for the post of PST (Primary School Teacher) the appellant being fully qualified applied for the said post and resultantly was appointed as PST in BPS-12, vide order dated 25.08.2016. (Copy of the appointment order dated 25.08.2016 is Annex "C")

- 5) That, after taking charge respondent No.5 has entered the Date of Birth of the appellant in her Service Book as 08.01.1982. (Copy of Service Book is Annex "D")
- 6) That, subsequently, respondents No.2 & 3, issued original certificate of SSC Exam in favour of the appellant, wherein, the Date of Birth of the appellant has been mentioned as 08.01.1978 and for the first time respondents No.1 & 2 has thrown a cloud of doubt on the correct and exact Date of Birth of the appellant. (Copy of original SSC Certificate is Annex "E")
- 7) That, this phenomenon added salt to the wounds of the appellant, further when her monthly salary was withheld by the respondent No.5, despite the performance of her duties by the appellant regularly since the date of her inception in the department.
- 8) That, this scenario was brought into the notice of respondent No.4, but instead of redressal of the grievance of the appellant another ID Card was issued to her with the Date of Birth mentioned as 08.01.1978, being subsequent in time. (Copies of ID Cards already attached as Annex "A & A/1")
- 9) That, respondent No.4 was requested and addressed through several applications to lessen the agony of appellant and her Date of Birth may kindly be corrected as 08.01.1982, but in vain. (Copy of application is Annex "F")
- 10) That, regarding the redressal of her grievance, the appellant knocked the door of learned Civil Court, but the said suit has been withdrawn with permission of the hon'ble Court to file afresh because of legal impediments and deficiency of funds. (Copy of the plaint

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and order of withdrawal are Annex "G and G/1" Respectively)

- 11) That, appellant being feeling highly aggrieved, filed W.P.No.5721-P/2018 before the hon'ble Peshawar High Court, Peshawar which after hearing was dismissed being not maintainable with the direction to appellant to approach proper forum. (Copy of grounds of writ petition and judgment dated 13.12.2018 is Annex "H")
- 12) That now appellant approaches this hon'ble Tribunal on the following grounds amongst others:-

GROUNDS

- A. That, to withheld the monthly salary of the appellant on the DUBIOUS ground of date of birth of the appellant is unjust, illegal, immoral, inhuman, un-Islamic, because the appellant is performing her duties very well and teaching the students keeping in view the principal where there is a duty there is a salary.
- B. That, mentioning double dates of birth and issuing two ID Cards to the appellant to some extent is a matter of routine, but in the instant case withholding the salary of the appellant is a matter of grave concern.
- C. That, this commission and omission on the part of respondent No.5 is a matter of inequality and falls within the ambit of violation of Article 4 and 27 and other enabling provisions of the Constitution of Islamic Republic of Pakistan, 1973
- D. That, there is no fault on the part of appellant, but rather the Date of Birth of the appellant has been mixed and mingled by the respondents by mentioning two different dates of births of the appellant.

E. That, as there is no fault on the part of the appellant, but the wrongful act has been done by the respondents and for such wrongful acts of the respondents, the appellant is being punished as withholding the lawful salary of the appellant.

F. That, the appellant begs to offer any additional grounds with the permission of this hon'ble Court at the time of hearing.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the respondents may kindly be directed to correct, the Date of Birth of the appellant as 08.01.1982 with further direction for insertion of this correct Date of Birth in the entire record of the appellant or direct the respondent No.5 to release and pay the monthly salaries of the appellant from the date of her appointment till the time the grievance of the appellant has been redressed by a proper forum continuously and without any break, subject to performance of her duties.

Culmaiz
Appellant
Through
Yousaf Ali
&
Behzad Haider.
Advocates Peshawar
Murad Ali
AFFIDAVIT *(Advocate)*

I, do hereby solemnly affirmed and declare on oath the contents of the instant **Appeal** are true and correct to and nothing has been concealed from this Hon'ble Court.

Deponent
Culmaiz

6

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

C.M.No. _____/2018

IN

Service Appeal No. _____/2018

Gul NazAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Mineral and others.....Respondents

**APPLICATION FOR INTERIM RELIEF
TO THE EFFECT THAT, DIRECTIONS
BE ISSUED TO THE RESPONDENTS
TO RELEASE THE PENDING
SALARIES OF THE PETITIONER
WITH CONTINUOUS PAYMENT
WITHOUT ANY BREAK TILL THE
FINAL DISPOSAL OF THIS INSTANT
WRIT PETITION, SUBJECT TO
PERFORMANCE OF THE DUTIES BY
THE PETITIONER.**

Respectfully Sheweth:

1. That the above titled appeal is being filed before this hon'ble Tribunal alongwith instant application.
2. That the grounds of main appeal may kindly also be considered as part and parcel of this application.
3. That the appellant is having a good prima-facie case in his favour and is also sanguine about its success.
4. That balance of convenience also lies in faovur of appellant.

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5. That if the relief as prayed for in the heading of this application is not granted, the very purpose of accompanying appeal will become infructuous.

It, is therefore, prayed that, on acceptance of this application, the pending salaries may graciously be released of the petitioner with continuous payment without any break till the final disposal of this instant writ petition, subject to performance of the duties by the petitioner.

Gulnaz
Appellant

Through

Yousaf Ali

&

Behzad Haider.

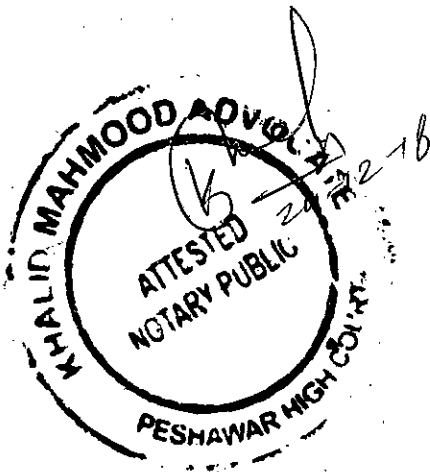
Advocates Peshawar

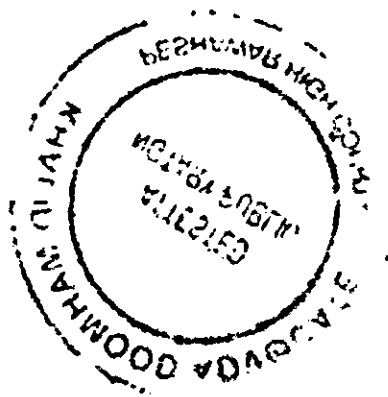
Murad ali

AFFIDAVIT

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

Deponent.





8

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018

Gul NazAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary Mineral and others.....Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

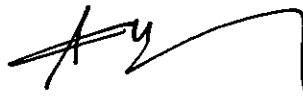
Gul Naz W/o Parvez Khan
R/o Mashan Khel, Urmar Payan, Peshawar.

RESPONDENTS:

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary,
Civil Secretariat, Peshawar.
- 2) Chairman Board of Intermediate & Secondary
Education, Peshawar.
- 3) Controller of Examination, BISE, Peshawar.
- 4) Director General, NADRA, Khyber Pakhtunkhwa
- 5) District Education Officer (F), Peshawar.

Appellant
Through

Yousaf Ali

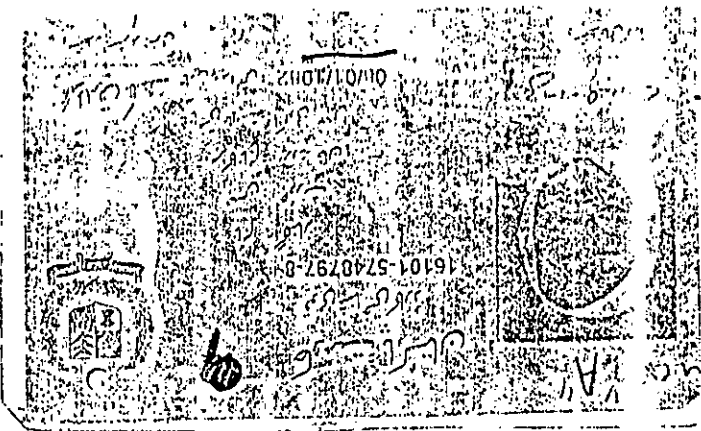


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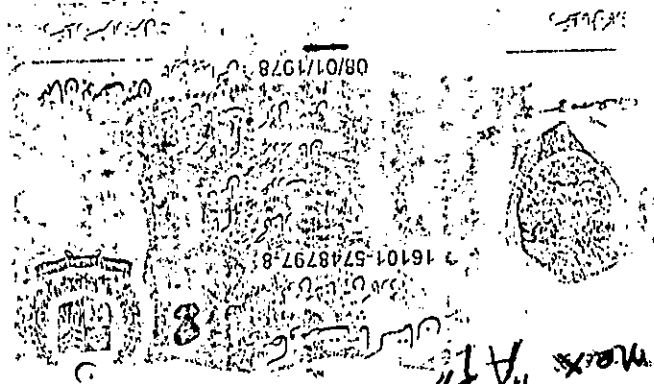
Behzad Haider.
Advocates Peshawar

ATTESTED

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Amex "AT"



Amex "AT"

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Govt. Girls High School No. 1
Mardan

Principal

g/c A. B. C.

Regd. No. - B/GGM-1-95

195

Checked by _____

Prepared by _____

Conduct _____

Marks Obtained _____

6 Physics/7. Chemistry/Pashto 8. Biology/Islamic Studies

1. English 2. Urdu 3. Islamiat Comp. 4. Pak Study 5. Mathematics/General Mathematics

SUBJECT PASSED

One Thousand Nine Hundred and Eighty two

Date of Birth 8-1-1982

Supplementary as a regular student of this School.

Secondary Education, Peshawar held in March 1997 Annual

Secondary School Certificate Examination from the Board of Intermediate and

Daughter of FARMAN ALI has passed the

Certified that GULNAR

Roll No. 105254

Admission No. _____

SESSION 1997

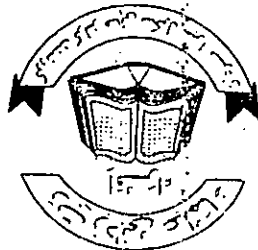
ANNUAL/SUPPLEMENTARY

Secondary School Certificate Examination

PROVISIONAL CERTIFICATE

MARDAN

GOVERNMENT



10

10

Answer

"B"

Annex C

12



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

APPOINTMENT:-

Consequent upon recommendation of the District Selection Committee, in its meeting held on 25-08-2016, appointment of the following Primary School Teachers (PST) 2015 candidates are hereby ordered against the post of PST, School based in BPS-12 (Rs. 11140-800-35140) @ Rs. 11140/- fixed plus usual allowances as admissible under the rules on contract/adhoc basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

Sr. No.	Name of Candidate	Father Name	NIC	Total Score	Place of Posting	Remarks
UC: 91 ACHINI BALA						
	SALMA KOUSAR	KHAIR UD DIN	17301-6738252-8	80.40	GGPS SANGU LANDY BALA NO.1 PESHAWAR	Against Vacant Post
	KIRAN	KHAIR UD DIN	17301-0023327-2	74.33	GGPS BARA QADIM PESHAWAR	Against Vacant Post
	FABIA KOUSAR	KHAIR UD DIN	17301-0559122-2	69.26	GGPS BARA QADIM PESHAWAR	Against Vacant Post
	NAZISH AH	MUBARAK ALI KHAN	17301-6505555-8	62.05	GGPS BARA QADIM PESHAWAR	Against Vacant Post
UC: 61 ADEZAI						
	SHAFEEA NAZ	HAYAT SHAH	17301-8368657-0	106.32	GGPS ADEZAI NO.1 PESHAWAR	Against Vacant Post
	ATIFA SUBHAN	FAZLE SUBHAN	17301-2764203-2	104.81	GGPS ADEZAI NO.1 PESHAWAR	Against Vacant Post
	MIA GUL	NAZAR SHAH	17301-3364452-2	103.59	GGPS ADEZAI NO.2 PESHAWAR	Against Vacant Post
	SAMIA SUBHAN	FAZLE SUBHAN	17301-1576648-4	94.45	GGPS ADEZAI NO.1 PESHAWAR	Against Vacant Post
	SALMA HAFIZ	MUHAMMAD HAFIZ	17301-7115586-0	94.40	GGPS GURJAN KALAY PESHAWAR	Against Vacant Post
UC: 26 AKHOON ABAD						
	MUBINAH	TAJ MUHAMMAD	17301-5947054-8	109.41	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
	TARA PARVEEN	TAJ MALOOK	17301-1268530-4	109.35	GGPS HAIDER COLONY PESHAWAR	Against Vacant Post
	SABRA	ISLAM GUL	17301-6781277-8	102.72	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
	MAIRA NASIR KHAN	MUHAMMAD NASIR KHAN	17301-1438825-4	99.41	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
	SHEEMA LAL FAQIR	LAL FAQIR KHAN	17301-4561032-6	75.00	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
	SALMA SIRAJ	SIRAJ UD DIN	17301-0734292-8	75.06	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
	SABIA AHMAD	ISHHAQ AHMAD	17301-1030474-8	74.92	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
	LUBNA AYUB	MUHAMMAD AYUB	17301-4931547-4	73.49	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
UC: 62 AZA KHEL						
	SURRAYA NAZ	BASHIR MUHAMMAD	17301-7770988-6	79.28	GGPS GHANIB KHEL (TFLA BAND) PESHAWAR	Against Vacant Post
	AISHA KAPTAN	KAPTAN SHER	17301-1051469-3	65.76	GGPS AZAKHEL NO.3 PESHAWAR	Against Vacant Post
	KALSOOM AKHTAR	KAPTAN SHER	17301-8216908-0	65.39	GGPS AZAKHEL NO.3 PESHAWAR	Against Vacant Post
	SALMA BIBI	ZARD ALI KHAN	17301-3992122-6	58.46	GGPS SADIQUE ABAD AZAKHEL PESHAWAR	Against Vacant Post
	ABIDA AKHTAR	AKHTER GUL	17301-3443993-0	58.09	GGPS AZAKHEL NO.1 PESHAWAR	Against Vacant Post
UC: 53 BADABER HAROZAI						
	NAUSHIN	ASAD KHAN	17301-2651939-4	88.71	GGPS BADIHER HAROZAI NO.2 PESHAWAR	Against Vacant Post

[Handwritten Signature]
ASAD KHAN

12

Sr. No.	Name of Candidate	Father Name	NIC	Total Score	Place of Posting	Remarks
UC: 47 (URMAR BALA)						
351	RAZIA NOOR	NOOR AKBAR	13101-8220892-1	98.20	GGPS GARIH CHANDAN UJARA PESHAWAR	Against Vacant Post
352	NAVFEDA	JUNAIS KHAN	17301-0190291-8	86.03	GGPS TUTI KHIL URMUR BALA PESHAWAR	Against Vacant Post
353	NASHFIN	RAHAM SHER	17301-2605037-0	81.29	GGPS URMAR BALA NO.2 PESHAWAR	Against Vacant Post
354	GHAZALA	ABDUR REHMAN	17301-1425172-0	79.14	GGPS KHARI KALA BAGHIANAN PESHAWAR	Against Vacant Post
UC: 45 (URMAR PAYAN)						
355	JAINA	SAJJAD KHAN	17301-3411748-0	84.33	GGPS UMAR PAYAN YOUSAF KHIL PESHAWAR	Against Vacant Post
356	SHAZMA	MUHAMMAD YOUNAS	17301-7300965-2	83.42	GGPS URMAR PAYAN NO.1 PESHAWAR	Against Vacant Post
357	AFSHAN H GUM	MISAL KHAN	17301-4666784-1	79.73	GGPS URMAR PAYAN NO.3 PESHAWAR	Against Vacant Post
358	GULNAZ	FAHMAN ALI	17301-5748797-8	77.52	GGPS URMAR PAYAN NO.1 PESHAWAR	Against Vacant Post
359	SHIRINAZ	FAZAL E RAHI	17301-7466499-0	77.12	GGPS URMAR PAYAN NO.1 PESHAWAR	Against Vacant Post
360	UZMA	FAZIAL E QAYUM	17301-3067077-0	75.28	GGPS URMAR PAYAN NO.1 PESHAWAR	Against Vacant Post
361	SANIA	KHURSHID	17301-0106639-6	75.28	GGPS UMAR PAYAN YOUSAF KHIL PESHAWAR	Against Vacant Post
UC: 69 (WADPAGGA)						
362	ASMA FARIK	S. MUHAMMAD SHAH	17301-2412036-1	112.91	GGPS WADPAGA PESHAWAR	Against Vacant Post
363	MEHWISH ZAHID	SYED ZAHID SHAH	17301-5684425-2	115.01	GGPS WADPAGA PESHAWAR	Against Vacant Post
364	MARYAM SARA	SYED IBRAHIM SHAH	17301-2104410-1	110.91	GGPS WADPAGA PESHAWAR	Against Vacant Post
365	RAWISH MASOOD	GGPS BUDHAI	17301-5749658-8	108.67	GGPS BUDHAI PESHAWAR	Against Vacant Post
366	SUMAIRA NAQVI	S. NAUMAN SALIM	17301-2042306-0	103.81	GGPS WADPAGA PESHAWAR	Against Vacant Post
367	AALIYA RAHIM	SYED ABDUL RAHI	17301-7922569-1	101.41	GGPS WADPAGA PESHAWAR	Against Vacant Post
MINORITY QUOTA						
368	ARZOO	MASKEEN	17301-4037172-8	84.58	GGPS FIDA ABAD PESHAWAR	Against Vacant Post
369	ROBINA ARIF	ARIF MASIH	17301-3458424-4	82.72	GGPS GUL ABAD PESHAWAR	Against Vacant Post
370	SAIRA BASHIR	BASHIR	17301-1210437-6	80.38	GGPS SUFAID DHERI NO.2 PESHAWAR	Against Vacant Post
371	SADAF SANJILIN	ASIRAF RAHI	17301-8450816-7	76.67	GGPS FARNAB FARM PESHAWAR	Against Vacant Post
372	SARA SALEEM	SALFEM JAN	17301-6121372-8	75.06	GGPS NEHTHA PESHAWAR	Against Vacant Post
373	ZEENAT GILL	MAHINDER	17301-1502795-2	72.81	GGPS SYDAN ZAINAB PESHAWAR	Against Vacant Post
374	FARIYAL	SHAMMOON PATRAS	17301-4906794-1	72.22	GGPS WAZIR BAGH NO.1 PESHAWAR	Against Vacant Post
375	FAIZA SALEEM	SALFEM MASIH	17301-1091702-0	70.92	GGPS WAZIR BAGH NO.2 PESHAWAR	Against Vacant Post
376	MARYAM MEHFOOZ	MEHFOOZ MASIH	17301-2892358-0	68.94	GGPS WAZIR BAGH NO.1 PESHAWAR	Against Vacant Post
377	SARA SALEEM	SALFEM MASIH	17301-3511761-4	68.84	GGPS SWATI GATE PESHAWAR	Against Vacant Post
378	FARAH MAHFOOZ	MEHFOOZ MASIH	17301-4935227-0	63.30	GGPS ZARGAR ABAD PESHAWAR	Against Vacant Post
379	ZOBARIA TANVEER SHIRAZI	TANVEER SHIRAZI	17301-6235288-4	62.54	GGPS MOHAMMAD ABAD PESHAWAR	Against Vacant Post
380	SARA SALEEM	SALFEM	17301-3826019-4	59.48	GGPS AKHOON ABAD PESHAWAR	Against Vacant Post
DISABLE QUOTA						
381	SHAKILA	NIJAZ MUHAMMAD	17301-2507218-0	110.62	GGPS PAWAK PESHAWAR	Against Vacant Post

[Handwritten signature and stamp]

13

Sr. No.	Name of Candidate	Father Name	NIC	Total Score	Place of Posting	Remarks
362	SHILA HAQIQ	MUHAMMAD HAQIQ HAQQANI	17301-9261473-0	81.53	GGPS ILIUNI PESHAWAR	Against Vacant Post
363	TAHIRA NAZ	WANIS KHAN	17301-0453467-2	96.57	GGPMS GULBELA (JICA) PESHAWAR	Against Vacant Post
364	NIGHAT	ABDUL MANAN	17301-4798451-6	76.51	GGPS GARHI QAMAR DIN PESHAWAR	Against Vacant Post
365	BUSHRA NAWAZ	MUHAMMAD NAWAZ	17301-6001393-0	76.14	GGPS KANIZA PESHAWAR	Against Vacant Post
366	BUS NIHAYAT PARVEEN	HAMISH GUL	17301-9341644-8	68.97	GGPS FATU ABDUR RAHIMA PESHAWAR	Against Vacant Post
367	ZEENAT BIBI	PEER MUHAMMAD	17301-9641113-6	67.23	GGPS ADEZAI NO.1 PESHAWAR	Against Vacant Post
368	SHEILA NAZ	GGPS MASHO PAIKEY	17301-6696745-0	61.97	GGPS MASHO PAIKEY PESHAWAR	Against Vacant Post
369	RAHILA	RAHMAN GUL	17301-3252713-2	59.32	GGPS GARHI FAZAI RAHIM PESHAWAR	Against Vacant Post

TERMS & CONDITIONS:-

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on ad hoc / contract base initially for one year /extendable.
4. The SDEO(F) Concerned should verify the certificate/degrees/domicile of the new appointees from the concerned agency/institution and refer to this office for release of pay. Furthermore, documents of any candidate found fake be reported for taking action and, order of such candidates will be withdrawn and she will not be eligible for the PST post in future.
5. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, one-month pay/allowance shall be forfeited to the Government.
6. Pay will not be drawn until and unless a certificate to the effect by the concerned SDEO(F) is issued that their degrees/certificates are verified from the concerned agencies.
7. They should join their post within 30 days of the issuance of this notification. In case of failure to join their post within 30 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
8. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. Before handing over charge they will sign an agreement with the department, otherwise this order will not be valid.
10. They will be governed by such rules and regulations as may be issued from time to time by the Government.
11. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
12. Their appointment is made on School based, they will have to serve at the place of posting, and their services are not transferable to any other station.
13. Before handing over charge once again their documents may be checked if they have not the required qualifications they may not be handed over charge.

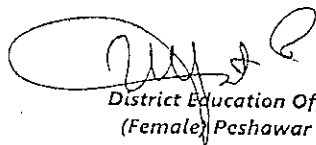
Note: PSHT concerned are directed to verify the said order from the concerned SDEO (F) before handing over charge.

(Ulfat Begum)
District Education Officer
(Female) Peshawar

Encls: No. 2916-3301/PST-2015/ Dated Peshawar the 26/09/2016

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Peshawar
3. IA to the Director L&SE Khyber Pakhtunkhwa, Peshawar
4. District Monitoring Officer, Peshawar
5. SDEO (F) Town-I, II, III & IV Peshawar
6. ASDEOs Circles Concerned.
7. Superintendent Estb: Local Office.
8. Officials Concerned.
9. M/File


District Education Officer
(Female) Peshawar

ATTESTED

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NAME:-
 GUL NAZ

FATHER NAME:-
 FARMAN ALI

DESIGNATION:-
 PST.

SCHOOL:-
 G.G.P.S NO. 1 URMAR

PAYAN.

Amex 'D'

151

(15)

(For use in Police Department only)

Note:—

Re:—

- 1. _____
- 2. _____
- 3. _____

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Verification Roll No. _____ dated _____ received back _____

S.C. Exam: BISE Left Thumb Impression PTC
 105254 1972 (H) 4/11/72
 385 850
 2693414
 Obtained 583 act: 900
 F.B.N. 20-6-2006

Qualification	Date	Qualification	Date
English	FA Exam BISE 2003 (CA)	First Arts	
Pushto	70672 54	B.L. Or B.A.	
Urdu	SD (F) Reserve	Pleadership examination	
Plan-drawing	BA Exam: RESM: Uni 2003 (Sep)	Training School Final examination	
Finger Print	247 SSA 24-7-904	Other qualification:—	
Drill Instructing	SD (F) Reserve		
Court Duties	MA Exam: Pass 2006 (A)		
Reserve Duties	2989 63 1100 06-3-007		
	SD (F) Reserve		

ATTESTED

N.B.— Line to be drawn under the qualification possessed.

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16

Note:- The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name: Gulnar

2. Race: Muslim

3. Residence: Village Umer Pujan Mahallah
Mashum Ubel Pader




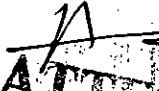

4. Father's name and residence: Farman Ali

5. Date of birth by Christian era as nearly as can be ascertained: 08-01-1982
Eight January N.H Eighty Two

6. Exact height by measurement: 5-3

7. Personal marks for identification: Nil

8. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger		Ring Finger	
Middle Finger		Fore Finger	
Thumb			

ATTACHED

9. Signature of Government Servant: Gulnar

10. Signature and designation of the Head of the Office, or other Attesting Officer.

--	--	--	--	--	--

18

Signature of
Government Servant.

9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure or praise of the Government Servant.
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		
					Period	Government to which debitible	
					Appointed as P.T. NTS at EPS under Pagar No. I Peshwar in B-12 R. 1140-20-35143 Fixed Plus. usual allow under DEO (F) EPS Edus Pesh. No. 2916-3301 dt. 26-8-2016 dt S.No. 338.		
					For Release under vide DEO (F) EPS Edus No. 5515-17 dt. 03-08-2017 S.No.		

Signature of
EDUC. TOWN

ATTESTED

18

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 374 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.
P&T NTS RPS 16/1/11 C		(B-12)	Rs 1140	-	800-35140		
			Rs 1140	=		97/11	C.No. 123

Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 6

Signature of
Edu. Insp.
T. S. J. S.

ATTESTED

کون کن

I

واقعہ دران

کیفیت	درجہ پورے دن بقایا		کس جماعت کے		کس جماعت میں داخل ہوا	سکونت	درجہ پورے دن بقایا	نات
	نہیں	ہند	درجہ پورے دن بقایا	کس جماعت کے				
S.L.C. School F.O. = 37/42	31/96	8/5/96	915D	915D	915D		Q	
					915C			
S.L.C. School F.O. = 37/42	31/95	8/5/95	915D	915D	915D			
					915B			
					915D		Q	
S.L.C. School F.O. = 37/42	31/96	8/5/96	915D	915D	915D		Q	
					915D			
					915C			
					915B			
					915E			
					915F			
S.L.C. School F.O. = 37/42	31/95	8/5/95	915D	915D	915D			
					915D			
S.L.C. School F.O. = 37/42	31/96	8/5/96	915D	915D	915F			

Certified to be true Copy

درجہ پورے دن بقایا

21

Annex "E"

S. No. PBR- 022617



Roll No. 105294

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan Secondary School Certificate Examination

SESSION 1997 (ANNUAL)
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Gul Naz

Son/Daughter of Farman Ali

and a student of Govt: Girls High School, No-1, Nardan

has passed the Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Peshawar held in April 1997
as a *Regular candidate*. He/She obtained 395 Marks out of 850
and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|---------------------|------------------------------|
| 1. English | 3. Islamiyat | 5. Gen: Science | 7. Isl: Studies |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Mathematics | 8. Element of Home Economics |

He/She has been awarded Grade D on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is Eighth January
one thousand nine hundred and Seventy Eight (8-1-1978)

[Signature]
Asstt. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure.

[Signature]
[Stamp]

28th July, 1997

22

بخدمت جناب ڈائریکٹر جنرل NADRA خیبر پختونخواہ

درخواست بمبراد منسوخی قومی شناختی کارڈ نمبر 8-16101-57487979

تاریخ اجراء 4.10.2018 تاریخ 4.10.2028

جناب عالی!

سائلہ حسب ذیل عرض رساں ہے۔

۱۔ یہ کہ سائلہ مشن خیل، ارمڑ پامیاں تحصیل و ضلع پشاور کارہائشی باشندہ ہے اور شوہر کا نام پرویز خان ہے۔

۲۔ یہ کہ موجودہ شناختی کارڈ جسکی سائلہ منسوخی چاہتی ہے اسی نمبر پر سائلہ کا ایک اور شناختی کارڈ موجود ہے جس کا اجراء مورخہ 6.01.2014 کو ہوا ہے اور اس طرح تاریخ تنسیخ 6.01.2024 درج ہے اور تاریخ پیدائش

8.01.1982 درج ہے۔

۳۔ یہ کہ اسی طرح سائلہ کے پروویژنل سکول سرٹیفیکیٹ SSC میں بھی سائلہ کی تاریخ پیدائش 08.01.1982 درج ہے۔

۴۔ یہ کہ سائلہ پرائمری سکول بچر ہے۔ (PST) اور سروس بک میں بھی سائلہ کی تاریخ پیدائش 8.01.1982 درج ہے۔

۵۔ یہ کہ سائلہ جس شناختی کارڈ کو منسوخ کرنا چاہتی ہے اس میں سائلہ کی تاریخ پیدائش 01.08.1978 درج ہے جو کہ نہ صرف غلط ہے بلکہ اس غلط اندراج کی بنا پر محکمہ تعلیم نے سائلہ کی تنخواہ بند کر دی ہے جو کہ سراسر ناانصافی پرینی ہے۔

لہذا استدعا ہے کہ سائلہ کا شناختی کارڈ بہ نمبری درج بالا جس میں تاریخ پیدائش 01.08.1978 درج ہے کو منسوخ فرمایا جائے اور شناختی کارڈ بہ تاریخ پیدائش 08.01.1982 کو بحال رکھا جائے تاکہ محکمہ تعلیم سائلہ کی تنخواہ جاری رکھ سکے عین نوازش ہوگی۔

سائلہ گل ناز زوجہ پرویز خان

درخواست بمراد جاری فرمانہ تنخواہ

سائلہ حسب ذیل عرض رساں ہے۔

جناب عالی!

- 1- یہ کہ سائلہ پشاور کی مستقل رہائشی ہے اور پرائمری سکول نمبر 1 ارثر پامان میں بطور ٹیچر خدمات سرانجام دے رہی ہے۔
- 2- یہ کہ سائلہ کی تاریخ پیدائش قومی شناختی کارڈ نمبر 08.01.1982 درج ہے جبکہ اس کے میٹرک ٹیفکیٹ میں غلطی سے تاریخ پیدائش 08.01.1978 درج کر دی گئی ہے
- 3- یہ کہ سائلہ نے پرائمری سکول ٹیچر کی آسامی کیلئے درخواست دی اور اسے 26.08.2016 کو پرائمری سکول ٹیچر BPS-12 میں بطور ٹیچر تعینات کر دیا گیا۔
- 4- یہ کہ سائلہ کی تعیناتی کے بعد مجاز حکام نے سائلہ کی سروس بک میں بھی تاریخ پیدائش 08.01.1982 درج کی ہے۔
- 5- یہ کہ سائلہ کے شناختی کارڈ اور تعامی اسناد میں تاریخ پیدائش کی غلطی کی وجہ سے مجاز حکام نے اس کی تنخواہ بند کر دی ہے۔
- 6- یہ کہ سائلہ نے تاریخ پیدائش کی درستگی اور تنخواہ کے اجراء کیلئے مقامی عدالت حضور میں کیس بھی دائر کیا اور عدالتی احکامات پر اب عدالت عالیہ پشاور میں رٹ دائر کی جا رہی ہے۔

لہذا استدعا ہے کہ بمنظوری درخواست ہذا سائلہ کی ماہانہ تنخواہ کے احکامات صادر فرمائے جائیں۔

سائلہ 29/11/18

Gulmar

گل ناز وجہ پرویز خان PST

ساکن مسن خیل ارثر پامان پشاور۔

0336-9075090

Before the court of Honorable Senior civil Judge Mardan

28.8.19

Gul Naz D/o Gaurman Khan R/o Karwan Road House No #2 Street No #01, Itihad colony Mardan. (Plaintiff)

v/s

- ① Chairman Board B.S.E Peshawar
- ② Controller of Examination B.S.E Peshawar (Defendants)

Subject:- Suit for declaration to The extent that correct date of Birth of the Plaintiff is 08/01/1978, as per NADRA

Certified To be True Copy

01/05/2019

Examination Branch Sessions Court Mardan

ATTESTED

and school records, while incorrectly, unlawfully, wrong - ly and ignorantly mention - ed in the official Record is the original certificate of B.S.E is 08/01/1978,



which un/profess, false, wrong, illegal unjust and against the Rule, facts, Shariya and Justice, and needs to be corrected in favor of the plaintiff.

⇒ value for the purpose of court fee = Rs = 500/-

value for the purpose of jurisdiction and hearing Rs = 200/-
civil court made

23/11/11
KHALID ANWAR
Civil Judge - Vidhan Mandali

⇒ cause of action arose just couple of days before inside in jurisdiction of the Honorable court, so that court has a jurisdiction to entertain the suit.

Respectfully Sheweth:- the plaintiff submits as under

- ① That the plaintiff namely Gul naz D/o Yousaf ali is the permanent Resident of Tehsil distt Mandan. Furthermore she is a Madhura Maskeen lady. —
- ② That as per the school character certificate the true and correct date of birth of the plaintiff is 08/01/1982
(photocopy Attached)

Certified To Be True Copy
01 NOV 2013

Examiner Copying Branch
Sessions Court Mandan

③ That as per the secondary school provisional certificate and CNIC issued by the NADRA is 08/01/1982, which is true and correct.

④ That as per the original certificate issued by the defendants is 08/01/1978 which is false, wrong, illegal, unjust and against the facts and justice and is not agreed upon the rights of the plaintiff, therefore needs to be corrected. (photo copies Attached)

⑤ That the instant plaintiff is a govt school teacher, in the Dept of her Academic, Medical and in service book issued to the plaintiff her D.O.B is 08/01/1982. But in spite of the said documentary proofs/Record the defendants have her D.O.B as 08/01/1978, which is wrong and incorrect and needs to be corrected. (photo copies Attached)

Certified To Be True Copy

10 NOV 2017

Examiner Copying Branch
Sessions Court Warden

Not due to the instant Blunder by the defendant, the plaintiff's history has been Blundered, that's why plaintiff suffers a lot because she is wife only person of her family. (11)

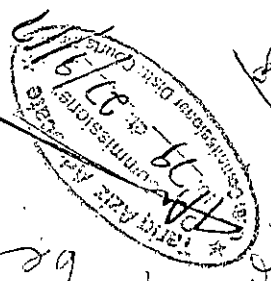
That no plaintiff want time and spend the defendant but was mother. (12)

That no proper court case and (13)

often and cause of action is history maintenance of the title of the suit.

It is therefore most surely proper before the honorable court to issue proper and justified order of correction of the date of birth of per rule of law and justice in favor of the plaintiff, any other relief deem possible, may not brought there may also be granted, desire may please be taken in favour of plaintiff.

Affidavit - All the contents a veridical and correct no prior suit has been filed.



The Court certified to be true copy
 01 NOV 2012
 MUHAMMAD BILAL
 Advocate
 At District Courts Mardan
 Examined before me At District Courts Mardan
 17/11/2012

Plaintiff

کتاب نمبر ۲۰۱۸

Annex "C1"

0-10
10.05.18

counsel for the plaintiff is present and submitted an application for release of the salary of the plaintiff who is PST at GGPS Umar Payan. According to the certificate issued by sub-Divisional Education Officer (F) Town 4 Peshawar the salary was not drawn, due to wrong date of birth of the plaintiff.

5

The file was requisitioned. Although the plaintiff is a teacher in Peshawar district which is not under the jurisdiction of this court, however, it is brought on the record that his case for correction of date of birth is pending in this court so the concerned office should act according to law.

5

(Announced)

MAJID AHMED
COURT CLERK

Certified To Be True Copy

05.05.2018

1st Floor, Court Branch
Sessions Court Peshawar

not Reader
28/5/2018

P.O is busy in election training.
to comp on 4-9-18

1

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P.No. _____ 2018

Gul Naz W/o Parvez Khan
R/o Mashan Khel, Urmar Payan, Peshawar.
..... Petitioner

Versus

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Chairman Board of Intermediate & Secondary Education, Peshawar.
- 3) Controller of Examination, BISE, Peshawar.
- 4) Director General, NADRA, Khyber Pakhtunkhwa
- 5) District Education Officer (F), Peshawar.

..... Respondents

**WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF PAKISTAN,
1973.**

ATTESTED
EXAMINER
Peshawar High Court

17 DEC 2018

Respectfully Sheweth:

The Petitioner submits as under:-

- 1) That, the petitioner is a bonafide resident of Tehsil & District Peshawar and have unfortunately and inadvertently or in other words through innocent mistake was issued two ID Cards by respondent No.4, wherein,

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PESHAWAR HIGH COURT PESHAWAR
FORM "A"
FORM OF ORDER SHEET



Court of.....

Case No.....

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
1	2	3
	13.12.2018	<p><u>Writ Petition No. 5721-P/2018.</u></p> <p>Present:</p> <p>Mr. Yousaf Ali, Advocate for petitioner.</p> <p>*****</p> <p><u>ROOH-UL-AMIN KHAN, J.-</u> Through the instant constitutional petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioner has asked for the issuance of an appropriate writ directing the respondents to correct her date of birth as 8.1.1982 with further direction for insertion of this correct date of birth in entire record of the petitioner or direct the respondent No.5 to release and pay the monthly salaries of the petitioner from the date of her appointment till the time of the grievance of the petitioner has been redressed by a proper forum continuously and without any break, subject to performance of her duties.</p>

ATTESTED

CLERK
Peshawar High Court

17 DEC 2018

30

		<p>2. In essence, the grievance of petitioner pertains to correction of her date of birth which has been wrongly mentioned as 8.1.1978 instead of 8.1.1982, and also has requested for direction to respondents for release of her monthly pay/salary.</p> <p>3. Be that as it may, confessedly the petitioner is a civil servant and the matter in hand falls under Chapter-II of the Civil Servants Act which enumerated the terms and conditions of service of a civil servant, wherein jurisdiction of this Court is expressly barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973.</p> <p>4. Resultantly, the instant petition being not maintainable stands dismissed in limine. However, petitioner would be at liberty to approach the proper forum, if so desire.</p> <p><i>Announced on; 13th of December, 2018</i></p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p>
--	--	---

Zarshad (DB) Hon'ble Mr. Justice Rooh Ul Amin Khan & Hon'ble Mr. Justice Qalandar Ali Khan

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8-7 of
The Qanun-e-Shahadat Order 1984
17 DEC 2018

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

SERVICE APPEAL NO.1507/2019

Gul Naz

V/S

Secretary E & SE and others

REPLY ON BEHALF OF RESPONDENTS No. 5.

Respectively Sheweth:

The Respondents submits bellow:

PRELIMINARY OBJECTIONS:

- 1. That the Appellant has got no cause of action /locus standi.
- 2. That the Appellant has concealed material facts from this Hon,ble Tribunal.
- 3. That the Appellant has been estopped by her own conduct to file the instant appeal before this Hon’ble Tribunal.
- 4. That the instant Appeal is bad for mis-joinder and non-joinder for the necessary parties.
- 5. That the Appellant has not come with clean hands to this Hon’ble Tribunal.
- 6. That the instant Appeal is barred by law.
- 7. That the Appellant does not fall within the ambit of aggrieved person.

ON FACTS.

1. That in reply to Para No.1, it is submitted that according to the Metric certificate her original date of birth is 08-01-1978.

Furthermore, in the NADRA record her date of birth is also 08-01-1978.

(Copy of letter of NADRA is attached as Annex: A)

2. That in reply to Para No.2, it is submitted that according to the admission registered of her concerned school and original certificate of the appellant her date of birth is 08-01-1978.

(Copy of School admission register & original Metric certificate are attached as Annex: B &C)

~~3.~~ That Para No.3 is incorrect, misleading and against the facts. The detail reply has been given in the above Para. Moreover, the department also conducts inquiry. In the light of inquiry report the appellant completed all her documentation including CNIC ~~on the basis of provisional certificate.~~ While according to law the date of birth of any educated person is consider in the original metric certificate of that person.

(Copy of inquiry ^{ies} report is attached as Annex: D & E)


- 4. That reply to Para No.4 pertains to record.
- 5. That reply to Para No.5 has already given in the above Para.
- 6. That reply to Para No.6 has already given in Para No.2 of the reply.
- 7. That Para No.7 is misleading and against the facts. The appellant known about her date of birth and she intentionally canceled her original date of birth.

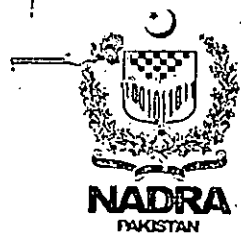
- 8. That Para No.8 also misleading and against the fact. Respondent No.4 acted according to law and rules.
- 9. That Para No.9 also misleading and against the facts. The appellant date of birth according to admission registrar and metric certificate is 08-01-1978.
- 10. That Para No.10 pertains to record.
- 11. That Para No.11 also pertains to record.
- 12. That the Appellant has no cause of action to file the instant appeal in this Hon'ble Service Tribunal.

GROUND

- A. That Ground-A is incorrect and misleading the appellant cancelled intentionally her original bate of birth.
- B. That Ground-B relates to Respondent No.4. Hence no comments.
- C. That Ground-C is incorrect and misleading. It is the duty of the appellant to show her original date of birth at the time of appointment.
- D. That Ground-D is incorrect and misleading the detail reply has been given in the above Para.
- E. That Ground-E is incorrect and misleading the appellant intentionally did not show her original date of birth according to her original metric certificate.
- F. That the Respondents have also seeks permission of this Hon'ble Tribunal to submit further / Additional Grounds at the time argument.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.


District Education Officer
(Female) Peshawar



GOVERNMENT OF PAKISTAN
MINISTRY OF INTERIOR
NATIONAL DATABASE & REGISTRATION AUTHORITY
Regional Head Office Peshawar

EOBI Building, Plot#31, Sector B-1, Phase-V Hayatabad Peshawar
Tel No. 091-9217844

Ammed (A)

No. NADRA/LEA/Misc-03/19-20

12 Feb, 2019

To: District Education Officer (Female),
Peshawar

Subject: **Verification of CNIC**
Ref: No.07 dated 1/02/2019

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1. In response to your above-referred letter on the subject captioned above, find herewith requisite information of below mentioned individual:

S#	Name	CNIC	Date of Birth
a	Gul Naz D/o Farman Khan	1610157487978	08-01-1978

2. Forwarded as desired, please.

M. Muhammad Ajmal Khan
Deputy Director (LEA Cell)
for Director General
Major Muhammad Ajmal Khan (R)

EDUCATION OFFICE
615
16-02-19

رہنما داخلہ خارج

نمبر و صفحہ

تاریخ داخلہ	نمبر سلسلہ	طالب علم کا نام	تاریخ پیدائش	پاپ کا نام	قوم یا ذات	ذرائع تعلیم
2-9-1995	11009 9064	نوسر	1-4-1979	محمد اقبال	افغان	غیر زرعی
	11010 10014	نوسر	4-6-1979	علم خان	"	"
	11011 10000	نوسر	4-5-1978	ابراہیم خان	"	"
	11012 10276	گکناز	[Redacted]	فرمان علی	"	"
	11013 9246	نوسر	1-1-1980	صنیر علی	افغان	"
	11014 9311	سائلم شہناز	11-11-1979	فاناز محمد	افغان	"
	11015 9827	عسکریہ علی	9-9-89	باہا علی	"	"
5-9-1995	11016 10307	رفعت آرا	7-6-1979	فضل الرحمان	"	"
	11017 9856	پروین علی	3-3-1978	سردار خان	"	"
	11018 9715	شامیہ آفر	3-4-1980	تلح علی	"	"
	11019 9833	شکیم	9-8-1980	ظاہر علی	"	"
	11020	نوسر	9-4-1981	سید الرحمن	"	"
18-9-95	11021	گکنا	29-4-1981	عبدالرؤف	"	"
	11022	عسکریہ علی	9-11-1979	محمد اسحاق	"	"

Principal
Govt. Girls' Higher Secondary School No. 1 Malakand

write by

S. No. PBR- 022617



Roll No. 105294

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination

SCHEME 1997 (ANNUAL)
(S. J. W. GROUP)

THIS IS TO CERTIFY THAT Gul Naz

Son/Daughter of Farman Ali

and a student of Govt. Girls High School, No-1, Mardan

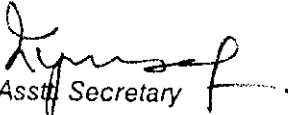
has passed the Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Peshawar held in April 1997
as a ~~candidate~~ He/She obtained 395 Marks out of 850
and has been placed in Grade Representing Fair

The Candidate passed in the following subjects.


- | | | | |
|------------|---------------------|---------------------|------------------------------|
| 1. English | 3. Islamiyat | 5. Gen: Science | 7. Isl: Studies |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Mathematics | 8. Element of Home Economics |

He/She has been awarded Grade on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is Eighth January
one thousand nine hundred and Seventy Eight (8-1-1978)


Asst. Secretary
28th July, 1997

This certificate is issued without alteration or erasure.


Secretary

P-8
Annex (D) 39

OFFICE OF THE HEAD MISTRESS G.G.H.S ACHINI PAYAN PESHAWAR.

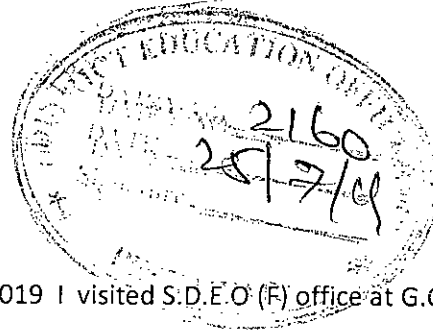
To,

The District Education officer

(Female) Peshawar

Subject, **INQUIRY REPORT**

Memo,



Reference your letter No: 2762 dated 06/07/2019 I visited S.D.E.O (F) office at G.G.M.S Gulshen Rehman Colony Kohat Road Peshawar.

Procedure: Interview.

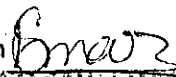
Findings:

- (1) Mst Gul Naz D/O Farman Ali appointed as PST through NTS at G.G.P.S Urmar Payan No. 1 Peshawar in BPS-12 vide order No: 2916-3301 dt 26/9/2016 at SNo. 338 DEO(F) Peshawar.
- (2) DEO(F) Peshawar issued her pay release order End No: 5515-17 NTS appointment 2015 dt 3/8/2017 at SNo. 8 on the basis of S.D.E.O (F) Town IV Peshawar letter No: 281 dated 27/7/2017.
- (3) During preparation of her service book, it has been found out that Date of birth in Original SSC annual 1997 is 08/01/1978 where as in provisional SSC (issued by G.G.H.S.S No: 1 (Mardan) date of birth is 08/01/1982.
- (4) Difference of date of birth in original & Provisional certificates were not checked / found out during preparation of merit list, Issuance of final appointment order and pay release order. Annex: A.&.B


Recommendation.

- (1) Mst Gul Naz D/o Farman Ali obtained / completed all her educational documentation including CNIC on the basis of Provisional certificate issued by G.G.H.S.S No: 1 Mardan.
- (2) Difference of date of birth in original & provisional Certificates was supposed to be checked on various stages by relevant officials / staff, which was not done honestly or mistakenly over looked.
- (3) The matter needs to be further investigated by a male officer if the concerned authority desires.

Endst No: 418 Dated 25/07/2019

Headmistress
G.G.H.S Achini Payan

~~HEAD MISTRESS~~
G.G.H.S, Achini Payan
Peshawar.

Estab-II


25/07/19

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Application No. ____/2019
IN
Service Appeal No. 263/19

Mst. Gul NazApplicant/Appellant
Versus
Govt of KP through Chief Secretary Govt of KP Civil Secretariat
Peshawar.....Respondents

INDEX

Sr #	Description of documents.	Annexure	Page
1)	Application		1
2)	Affidavit		2
3)	Copy of Writ Petition and order dated:13.12.2018	A	3-12

Put up to the court with
relevant appeal.

Reader

Reader
17/9/18,

Through

Appellant

Yusaf Ali

Yousaf Ali
Advocate, Peshawar

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR.

Application No. ____/2019
IN
Service Appeal No. 263/19

Khyber Pakhtukhwa
Service Tribunal

Diary No. 948

Dated 16/9/2019

Mst. Gul NazApplicant/Appellant

Versus

Govt of KP through Chief Secretary Govt of KP Civil Secretariat
Peshawar.....Respondents

APPLICATION BRINGING ON RECORD


ADDITIONAL DOCUMENTS

Respectfully Sheweth:-

1. That the captioned appeal is pending before this Honorable Tribunal which is fixed on 19.09.2019.
2. That the appellant/ applicant wants to place on file additional documents. (Copies are annexed herewith as Annexure A).

It is therefore, humbly requested that the documents may kindly be place on the main file.

Through Appellant


Yousaf Ali
Advocate, Peshawar

3

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Application No. ___/2019
IN
Service Appeal No. 263/19

Mst. Gul NazApplicant/Appellant

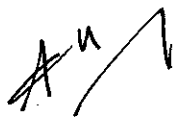
Versus

Govt of KP through Chief Secretary Govt of KP Civil Secretariat
Peshawar.....Respondents

AFFIDAVIT

I, Mst Gul Naz W/o Pervez Khan R/o Mashan Khel, Urmar Payan,
Peshawar do hereby solemnly affirm and declare on oath that the
contents of this application are true and correct to the best of my
knowledge and belief and nothing has been concealed from this
Honourable court.


DEPONENT



(+)

ANEX. A

(4)

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P.No. _____ 2018

Gul Naz W/o Parvez Khan
R/o Mashan Khel, Urmar Payan, Peshawar.

..... Petitioner



Versus

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary,
Civil Secretariat, Peshawar.
- 2) Chairman Board of Intermediate & Secondary
Education, Peshawar.
- 3) Controller of Examination, BISE, Peshawar.
- 4) Director General, NADRA, Khyber Pakhtunkhwa
- 5) District Education Officer (F), Peshawar.

..... Respondents

***WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF PAKISTAN,
1973.***

Respectfully Sheweth:

The Petitioner submits as under:-

- 1) That, the petitioner is a bonafide resident of Tehsil &
District Peshawar and have unfortunately and
inadvertently or in other words through innocent mistake
was issued two ID Cards by respondent No.4, wherein,

ATTESTED

**EXAMINER
Peshawar High Court**

2

5

in one ID Card the Date of Birth of the petitioner has wrongly been mentioned as 08.01.1978 bearing one and same number. (Copies of ID Cards of the petitioner are Annex "A & A/1" respectively)

- 2) That after passing SSC examination, respondents No.2 & 3, issued Provisional Certificate to petitioner, which also bears Date of Birth of the petitioner as 08.01.1982. (Copy of the Provisional Certificate is Annex "B")
- 3) That it is pertinent to mention here that the petitioner's first ID Card which contained the Date of Birth of the petitioner as 08.01.1982 has also been issued by the respondent No.4 on the basis of authentic documents, therefore, the correct Date of Birth of the petitioner be considered as 08.01.1982 for the reasons, because all the subsequent documents issued by either of the respondents contained the Date of Birth of the petitioner as 08.01.1982.
- 4) That, meanwhile, the respondent No.5 invited application through press for the post of PST (Primary School Teacher) the petitioner being fully qualified applied for the said post and resultantly was appointed as PST in BPS-12, vide order dated 25.08.2016. (Copy of the appointment order dated 25.08.2016 is Annex "C")
- 5) That, after taking charge respondent No.5 has entered the Date of Birth of the petitioner in her Service Book as 08.01.1982. (Copy of Service Book is Annex "D")
- 6) That, subsequently, respondents No.2 & 3, issued original certificate of SSC Exam in favour of the petitioner, wherein, the Date of Birth of the petitioner has been mentioned as 08.01.1978 and for the first time

ATTESTED
EXAMINER
Peshawar High Court

② ⑥

respondents No.1 & 2 has thrown a cloud of doubt on the correct and exact Date of Birth of the petitioner. (Copy of original SSC Certificate is Annex "E")

- 7) That, this phenomenon added salt to the wounds of the petitioner, further when her monthly salary was withheld by the respondent No.5, despite the performance of her duties by the petitioner regularly since the date of her inception in the department.
- 8) That, this scenario was brought into the notice of respondent No.4, but instead of redressal of the grievance of the petitioner another ID Card was issued to her with the Date of Birth mentioned as 08.01.1978, being subsequent in time. (Copies of ID Cards already attached as Annex "A & A/1")
- 9) That, respondent No.4 was requested and addressed through several applications to lessen the agony of petitioner and her Date of Birth may kindly be corrected as 08.01.1982, but in vain. (Copy of application is Annex "F")
- 10) That, regarding the redressal of her grievance, the petitioner knocked the door of learned Civil Court, but the said suit has been withdrawn with permission of the hon'ble Court to file afresh because of legal impediments and deficiency of funds. (Copy of the plaint and order of withdrawal are Annex "G and G/1" Respectively)
- 11) That, petitioner being feeling highly aggrieved, hence, the instant writ petition on the following amongst other grounds, inter-alia:-

ATTESTED
EXAMINER
Peshawar High Court

7 7
GROUND

- A. That, to withheld the monthly salary of the petitioner on the DUBIOUS ground of date of birth of the petitioner is unjust, illegal, immoral, inhuman, un-Islamic, because the petitioner is performing her duties very well and teaching the students keeping in view the principal where there is a duty there is a salary.
- B. That, mentioning double dates of birth and issuing two ID Cards to the petitioner to some extent is a matter of routine, but in the instant case withholding the salary of the petitioner is a matter of grave concern.
- C. That, this commission and omission on the part of respondent No.5 is a matter of inequality and falls within the ambit of violation of Article 4 and 27 and other enabling provisions of the Constitution of Islamic Republic of Pakistan, 1973
- D. That, there is no fault on the part of petitioner, but rather the Date of Birth of the petitioner has been mixed and mingled by the respondents by mentioning two different dates of births of the petitioner.
- E. That, as there is no fault on the part of the petitioner, but the wrongful act has been done by the respondents and for such wrongful acts of the respondents, the petitioner is being punished as withholding the lawful salary of the petitioner.
- F. That, the petitioner begs to offer any additional grounds with the permission of this hon'ble Court at the time of hearing.

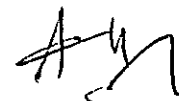
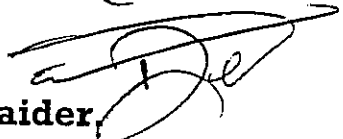
ATTESTED
EXAMINER
Peshawar High Court

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It is, therefore, most humbly prayed that on acceptance of the instant petition, the respondents may kindly be directed to correct, the Date of Birth of the petitioner as 08.01.1982 with further direction for insertion of this correct Date of Birth in the entire record of the petitioner or direct the respondent No.5 to release and pay the monthly salaries of the petitioner from the date of her appointment till the time the grievance of the petitioner has been redressed by a proper forum continuously and without any break, subject to performance of her duties.

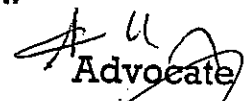
INTERIM RELIEF

By way of interim relief, their lordship are very humbly requested to release the pending salaries of the petitioner with continuous payment without any break till the final disposal of this instant writ petition, subject to performance of the duties by the petitioner.

Petitioner
Through
Yousaf Ali 
&
Behzad Haider 
Advocates Peshawar

CERTIFICATE:

Certified that as per information and instructions furnished by my client no such like writ petition has earlier been filed by the petitioner on the subject in this hon'ble Court.


Advocate

LIST OF BOOKS:

- 1) Constitution of Islamic Republic of Pakistan, 1973.
- 2) Case law.

CERTIFIED TO BE TRUE COPY
Peshawar Bench of the High Court, Peshawar
Authorized Under Article 87 of
The Constitution of Pakistan 1973
06 APR 2019

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PESHAWAR HIGH COURT PESHAWAR
FORM "A"
FORM OF ORDER SHEET

Court of.....

Case No.....



Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
1	2	3
	13.12.2018	<p><u>Writ Petition No. 5721-P/2018.</u></p> <p>Present:</p> <p>Mr. Yousaf Ali, Advocate for petitioner.</p> <p>*****</p> <p><u>ROOH-UL-AMIN KHAN, J.-</u> Through the instant constitutional petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, petitioner has asked for the issuance of an appropriate writ directing the respondents to correct her date of birth as 8.1.1982 with further direction for insertion of this correct date of birth in entire record of the petitioner or direct the respondent No.5 to release and pay the monthly salaries of the petitioner from the date of her appointment till the time of the grievance of the petitioner has been redressed by a proper forum continuously and without any break, subject to performance of her duties.</p>

ATTESTED
EXAMINER
Peshawar High Court

2. In essence, the grievance of petitioner pertains to correction of her date of birth which has been wrongly mentioned as 8.1.1978 instead of 8.1.1982, and also has requested for direction to respondents for release of her monthly pay/salary.

3. Be that as it may, confessedly the petitioner is a civil servant and the matter in hand falls under Chapter-II of the Civil Servants Act which enumerated the terms and conditions of service of a civil servant, wherein jurisdiction of this Court is expressly barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973.

4. Resultantly, the instant petition being not maintainable stands dismissed in limine. However, petitioner would be at liberty to approach the proper forum, if so desire.

*Announced on;
13th of December, 2018*



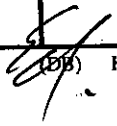
JUDGE

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EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 87 of
The Qanun-e-Shahadat Order 1984

06 APR 2019

Zarshad



(DB) Hon'ble Mr. Justice Rooh Ul Arain Khan & Hon'ble Mr. Justice Qalandar Ali Khan

لجہ التعلیم دیوبند مردان

سنگھ گلزار

(مدعیہ)

بنام

چیرمین برورد وغیرہ

(مدعی علیہ)

دعویٰ رستہ داروں

خوب عالی ا۔ جوا۔ دعویٰ بجانب مدعی علیہم ۱۲۱ ذیل عرفی مع۔

عذرات تمہیدی:

۱) مدعیہ کو کوئی نیا نئے دعوئے برحدت مدعی علیہم ۱۲۱ حاصل نہ ہو۔

۲) دعوئے مدعیہ بشکل موجودہ غلط ہے۔

۳) عدالت حضور انور انور کو اختیار سماعت حاصل نہ ہو۔

۴) دعویٰ مدعیہ پر جو شدت سے فرزندوں فرزند اور پر جو علم شمولیت

فرزند فرزند قابل افساج م۔

۵) دعوئے مدعیہ اندر عیاد نہ ہو اور قابل افساج م۔

۶) مدعیہ کی اصل در دست "مارچ اپریل ۱۹۷۸-۰۱-۰۸" ہے جو کہ

ریا رڈ مدعی علیہم ۱۲۱ میں در دست طور پر درج م۔

عذرات دائمی:

۱) فترت سے جوہ لائمی انکار ہے۔

۲) فترت سے غلط فہم فہم قانون و واقعات م اسلئے انکار م مدعیہ کی

درست "مارچ اپریل ۱۹۷۸-۰۱-۰۸" ہے۔

۳) فترت سے غلط فہم قانون م اسلئے انکار م مدعیہ کی درست

"مارچ اپریل ۱۹۷۸-۰۱-۰۸" ہے۔

۴) فترت سے غلط فہم اسلئے انکار م کیونکہ مدعیہ کی درست "مارچ اپریل ۱۹۷۸-۰۱-۰۸"

م جو کہ ریا رڈ مدعی علیہم ۱۲۱ میں در دست طور پر درج م۔

۵) فترت سے غلط فہم قانون و واقعات م مدعیہ کی درست "مارچ اپریل ۱۹۷۸-۰۱-۰۸"

م اسلئے انکار م۔

۶) فترت سے غلط فہم قانون و واقعات م اسلئے انکار م۔

۷) فترت سے غلط فہم قانون اور عدالت م قانون م اسلئے انکار م۔

۸) فترت سے غلط فہم اسلئے انکار م۔

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Examiner Copying Branch
Sessions Court Mardan

بیان علی

محمد مراد جواہر دہلوی

نامہ ہم دین میں ہے

میں در دست ہے

اسلئے عام نہ دعوئے مدعیہ کے فرزندوں کے

خارج نہ کیا جائے

بنام

A

02-2-18

ALBISEP

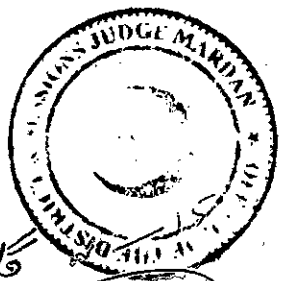
مدعی علیہ

چیرمین برورد وغیرہ

چیرمین برورد وغیرہ
ATTESTED
DILBAR KHAN
Advocate
Not a Public Officer

02-2-18

لیجر الٹ دیوانی سردان



I got no objection in this application

Amir
18-9-18

بنام محمد حسین بوردو کلناز

دعویٰ استعراق

18/9/18
Khalid Anwar
Civil Judge-V, Mardan

خدا علی
درخواست نمبر 1
15-07-18
Withdrawal of Suit

1) یہ کہ مقدمہ نمبر 1874/18 کے تحت دائر شدہ ہے اور اس کے تحت ایک فریق نے اپنا حصہ وافر سے واپس لے لیا ہے۔

2) یہ کہ مقدمہ نمبر 1874/18 کے تحت دائر شدہ ہے اور اس کے تحت ایک فریق نے اپنا حصہ وافر سے واپس لے لیا ہے۔

3) یہ کہ مقدمہ نمبر 1874/18 کے تحت دائر شدہ ہے اور اس کے تحت ایک فریق نے اپنا حصہ وافر سے واپس لے لیا ہے۔

کلناز کے لئے درخواست نمبر 1874/18 کے تحت دائر شدہ ہے اور اس کے تحت ایک فریق نے اپنا حصہ وافر سے واپس لے لیا ہے۔

18/9/18

Exam...
Sessions

محمد حسین بوردو کلناز