

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

C.M Application No. _____/2024

IN Service Appeal No: 717/2023

Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa,
and others

.....**APPLICANTS**

VERSUS

Dilshad Hussain Libraqrian, (BPS-18), Khushal Khan Khattak, Library, Akora
Khattak, Nowshera

.....**RESPONDENT**

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Deponent



Mrs. Raheela Hafeez
Director,
Directorate of Archives &
Libraries, Khyber Pakhtunkhwa
Applicant/Respondent No. 4
CNIN # 17301-8818000-2

16-05-2024
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

C.M Application No. _____/2024

IN Service Appeal No: 717/2023

Khyber Pakhtunkhwa
Service TribunalDiary No. 11224Dated 19-02-2024Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa,
and others.....**APPLICANTS**

VERSUS

Dilshad Hussain Libraqrian, (BPS-18), Khushal Khan Khattak, Library, Akora
Khattak, Nowshera.....**RESPONDENT****APPLICATION FOR ADDING PARTIES AS RESPONDENTS UNDER
RULE-20 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
RULES, 1974 READ WITH ORDER-1 RULE-10 (02) OF C.P.C 1908:****Respectfully Sheweth,**


1. That the Appellant has filed the said service appeal and the official Respondents have submitted reply to the said service appeal which may be considered as an integral part of this C.M Application. The service appeal in hand is pending adjudication before this honorable tribunal in which the date of hearing has been fixed on **16-05-2024**.
2. That the Applicant in reply to the said service appeal rely on the Guidelines of Higher Education Commission, Islamabad regarding inter alia, affiliation and recognition of degrees to be issued by the Degree Awarding Institutions (DAI), Private and Public Universities throughout Pakistan and these guidelines have been incorporated in

the Higher Education Regularity Authority (HERA), **Khyber Pakhtunkhwa, Functions and Regulations** made under Section-26, of the **Khyber Pakhtunkhwa Registration and Functioning of Private Education Institutions Ordinance 2001**.

3. That the Answering Respondent / Applicant requested the Higher Education Commission of Islamabad for the verification and recognition of the Degree of the Appellant however the later did not respond / verify the Degree of the Appellant.
4. That the Appellant claims to have studied/ completed one year **MLISC degree** program in Lakki College of Education and Research, Lakki Marwat District which was not affiliated with the Bannu University of Science and Technology (BUST), Bannu, however, the Registrar, Bannu University of Science and Technology (BUST) awarded illegally one year Master in Library Science (MLISC) degree to the Appellant. The Lakki College of Education and Research, Lakki Marwat was neither affiliated nor registered with the HERA, Khyber Pakhtunkhwa. Under Rule-6 of the HERA, Khyber Pakhtunkhwa Higher Education Regularity Authority Functions and Regulations, 2006, **“A Public Sector University will allow affiliation only to those Education Institutions / Colleges who are registered with the HERA, Khyber Pakhtunkhwa”**.
5. That the Lakki College of Education and Research, Lakki Marwat was neither affiliated nor registered with the HERA, Khyber Pakhtunkhwa at the time of awarding of MLISC Degree to the Appellant. Therefore, the Degree awarded by BUST, Bannu to the Appellant is illegal and entails its withdrawal after fulfillment of all codal formalities.

In view of the above facts it is humbly prayed that in order to enable this honorable Tribunal to effectually and completely, to adjudicate upon and settle all the questions in the instant service appeal, the following Authorities/Institutions may be added as Respondents, as without their inputs/comments the instant service appeal mainly revolving the legality and recognition of the **MLISC Degree** of the Appellant cannot be decided fairly and justly in accordance law.

1. Chairman Higher Education Commission (HEC), Sector, H-9, East Service Road Islamabad.
- ii. Chairman, HERA, Khyber Pakhtunkhwa, 46/A, Sector B-2, Phase-5, Hayatabad, Peshawar.
- iii. Principal, Lakki College of Education and Research, District Lakki Marwat.
- iv. Vice Chancellor, Bannu University of Science and Technology (BUST), Bannu
- iv. Registrar, Bannu University of Science and Technology, Bannu (BUST)
- v. Chancellor, Bannu University of Science and Technology through Principal Secretary to Governor, Khyber Pakhtunkhwa.


 Director,
 Directorate of Archives &
 Libraries, Khyber Pakhtunkhwa
 Applicant/Respondent No. 4

Raheel Hafiz

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.....RESPONDENT**AFFIDAVIT**

I, Mrs. Raheela Hafiz, Director, Directorate of Archives & Libraries, Khyber Pakhtunkhwa do hereby solemnly affirm and declare on oath that the contents of the C.M Application are correct and true and nothing has been concealed from this honorable tribunal. It is further stated that the Applicants/Respondents have neither been placed ex-parte nor any cost/liabilities are pending to be paid by them.

Deponent


Mrs. Raheela Hafeez
Director,
Directorate of Archives &
Libraries, Khyber Pakhtunkhwa
Applicant/Respondent No. 4
CNIN # 17301-8818000-2


Muhammad Arshad Iqbal
Advocate
Oath Commissioner

19/02/2024