FORM OF ORDER SHEET

Form-A

Court of

1603

Case No -

Date of order

proceedings

22/01/2021

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S.No.

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Order or other proceedings with signature of judge

3
The appeal presented today by Mr. Muhammad Ashfaq Kha
Akhunkhail Advocate may be entered in the Institution Register and put t
he Learned Member for proper order please.
REGISTRAR
This case is entrusted to S. Bench for preliminary hearing to be pu

up there on 3321

03.03.2021 The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 28.07.2021.

Reader

MEMBER(J)



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No...... /2021

Zafar Iqbal

VS

Govt of KP through Secretary E & SE) & others

INDEX OF DOCUMENTS

DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
Memo of appeal		1-2
Copy of Notification dated 20/12/2012	A	3
Copies of Pay slips	B&C	4-5
Copy of Departmental appeal/representation		6
Copy of Judgment dated 11/11/2019	E	7-8
Wakalatnama		9
	Memo of appeal Copy of Notification dated 20/12/2012 Copies of Pay slips Copy of Departmental appeal/representation Copy of Judgment dated 11/11/2019	Memo of appeal

Through

ppellant

Allen

M. Ashfaq KhanAkhunkhail

Syed Zeşhan Khan &

Mujeebullah

Advocates Khalid & Law Associates 46-C, 2nd Four, Cantonment Plaza, Peshawar Saddar Cell No. 0333-8522332 Ashfaqkhan182@gmail.com

Dated:

Service Tribunal

Diary No. 1608

BEFORE THE KHYBER PAKHTUNK7H7WA SERVICE TRIBUNAL L Nyber Pakhtukhwa

PESHAWAR

Zafar Igbal

Presently serving as SDA (BPS 16) in GCMHS Timergara Dir Lower

(APPELLANT)

VERSUS

- 1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar
- 2. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar
- 3. The Secretary Finance Khyber Pakhtunkhwa, Peshawar
- 4. The Accountant General, Khyber Pakhtunkhwa, Peshawar
- 5. The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar

(RESPONDENTS) APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE **CONVEYANCE** ALLOWANCE OF THE APPELLANT DURING WINTER & SUMMER VACATIONS AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this Appeal the Respondents may kindly be directed not to make deduction of conveyance allowance during vacations period(Summer & Winter Vacations) and make the payment of all outstanding amount of Conveyance allowance which have been deducted previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

FACTS:

- 1. That the Appellant is serving in the Elementary and Secondary Education department as Senior Drawing Teacher (BPS-16) quiet efficiently and up to the entire satisfaction of the superiors.
- 2. That the Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No.FD(PRC) 1-1/2011 dated 14-07-2011 was issued.
- 3. That later on the finance department enhanced/ revise the rate of conveyance Allowance dto-dayvide Notification dated 20-12-2012 for civil servants (BPS-1-15) but Respondents have treated the Appellants under the previous notificationby not enhancing their conveyance allowance. istrar

(Copy of the Notification are attached as annexure A)

- 11714That Appellant was receiving the conveyance allowances as admissible under the law and rules but the Respondents without any valid and justifiable reasons stopped/deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. (Copies of the Salary slips of working/serving month and vacations deduction period are attached as annexure B&C)
 - 5. That similar placed employees of Elementary & Secondary Éducation Department (hereinafter referred as E &S Education Department) approached this August Tribunal and their grievance was redressed vide judgment dated 11-11-2019. (Copy of Judgment dated 11/11/2019 is attached as annexure D)
 - 6. That being aggrieved form the illegal action of deduction of conveyance allowance, the Appellant preferred departmental appeal before the competent authority but the same has not been responded by Respondents within the statutory period of ninety days. (Copy of departmental appeal is annexed as annexure E)
 - 7. That feeling aggrieved from action and inaction of the Respondents and having no other remedy available, hence, the Appellant approaches this Hon'ble Court inter alia on the following grounds.

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<u>GROUNDS:</u>

X

- A. That the action and inaction of the Respondents regarding deduction of conveyance allowance for vacations period/months is illegal, against the law, facts, norms of natural justice.
- B. That the Appellant has not been treated by the Respondent Department in accordance with law and rules on the subject noted above and as such the Respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C. That the action of the Respondents is without any legal authority, discriminatory and in clear violation of fundamental rights duly guaranteed by the Constitution and is liable to be declared as null and void.
- D. That there is clear difference between leave and vacation as leave is governed by Government Servant Revised Leave Rules,1981 while vacations are always announced by the Government, therefore under the law and Rules the Appellant is fully entitle for the grant of conveyance allowance during vacation period.
- E. That the Government Servants Revised Leave Rules, 1981 clearly explain that the civil servants who avail the vacations are allowed only one leave in a month whereas, the other civil servants may avail 04 days leave in a calendar months and the same are credited to his account and in this way he may avail 48 days earned leave with full pay, whereas the Government servants to avail vacation such as appellant is allowed one day leave in a month and twelve(12) days in a year and earned leave for twelve days in a year are credited to his account and there is no question of deduction of conveyance allowance lost sight of this legal aspects and illegally and without any authority started the recovery and deduction of conveyance allowance from appellant.
- F. That as the act of the Respondents is illegal, unconstitutional, without any legal authority and discriminatory hence, not tenable in the eye of law.
- G. That Appellant has vested right of equal treatment before law and the act of the Respondents to deprive the Appellants from the conveyance/allowance is unconstitutional and clear violation of fundamental rights.
- H. That according to Government Servants Revised leave Rules,1981 vacations are holidays and not leave of any kind,therefore,the deduction of conveyance allowance in vacations is against the law and rules.
- I. That according to Article 38(e) of the Constitution of Islamic Republic of Pakistan,1973 the state is bound to reduce disparity in the income and earning of individuals including persons in the services of the federation, therefore in light of the said Article the Appellant is fully entitle for the grant of conveyance allowance during vacations.
- J. That the Appellants seeks permission of this Hon'ble Court to raise any other grounds available at the time of arguments.

In wake of above submission, it is, therefore, must humbly prayed that on acceptance of this Appeal the Respondents may kindly be directed not to make deduction of conveyance allowance during vacations period(Summer & Winter Vacations) and make the payment of all outstanding amount of Conveyance allowance which have been deducted previously with all back benefits Or

Any other remedy which this august Tribunal deems just and proper that may also be awarded in favor of the Appellant.

Through

M. Ashfaq KhanAkhunkhail Syed Zeshan Khan & Mujeebullah ADVOCATES

Khalid & Law Associates 46-C, 2nd Four, Cantonment Plaza, Peshawar Saddar

CERTIFICATE

As per instruction of my client prior to the present one, no such like appeal has been filed by the Appellant before this Hon'ble Court.

ADVOCA

OVERNNENT OF KHTELE MAXIMUNK FINANCE DEPARTMENT REGULATIONIMING

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GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGULATION WING)

 $p \in \{q_1, \ldots, q_n\} \in \{q_n\}$

No. FD/SO(SR-II)/52/2012Dated Peshawar the: 20.12.2012

From

The Secretary to Govt of Khyber Pakhtunkhwa Finance Department, Peshawar

To,

- 1. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa
- 2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa
- 3. The Secretary to Governor, Khyber Pakhtunkhwa
- 4. The Secretary to Chief Minister, Khyber Pakhtunkhwa

5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa

- 6. All Heads of attached Departments in Khyber Pakhtunkhwa
- 7. All District Coordination Officers of Khyber Pakhtunkhwa
- 8. All Political Agents / District & Session Judge in Khyber Pakhtunkhwa
- 9. The Registrar Peshawar High Court, Peshawar
- 10. The Chairman Public Service Commission, Khyber Pakhtunkhwa
- 11. The Chairman, Service Tribunal, Khyber Pakhtunkhwa

Subject:- <u>REVISION IN THE RATE OF CONVEYANCE ALLOWANCE</u> <u>FOR THE CIVIL EMPLOYEES OF THE KHYBER</u> <u>PAKHTUNKHWA PROVINCIAL GOVERNMENT BPS-1-19</u>

Dear Sir,

The Government of Khyber Pakhtunkhwa has been pleased to enhance/revise the rate of conveyance Allowance admissible to all the Provincial Civil Servants Govt of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) w.e.f from 1st September, 2012 at the following rates. However, the conveyance allowance for employees in BPS-16 to BPS-19 will remain un-changed

S. No	BPS	Existing Rate (PM)	Revised Rate (PM)
1.	1-4	Rs. 1500/-	Rs. 1700/-
2.	5-10	Rs 1500/-	Rs. 1840/-
3.	11-15	Rs 2000/-	Rs. 2720/-
4.	16-19	Rs. 5000/-	Rs. 5000/-

2. Conveyance Allowance at the above rates per month shall be admissible to those BPS-17, 18 and 19 Officers who have not been sanctioned official vehicle.

Your Faithfull

(Sahibzada Saeed Ahmad) Secretary Finance

Endst No. FD/SO(SR-II)8-52/2012 Dated Peshawar the 20th December, 2012

Dist. Govt. NWFP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (January-2019)



Personal Information of Mr ZAFAR IQBAL-d/w/s of MUHAMMAD AKBAR JAN

Personnel Number: 00266881	CNIC: 10990014837
Date of Birth: 15.04.1969	Entry into Govt. Service

Service: 05.10.1989

NTN:

Length of Service: 29 Years 03 Months 028 Days

Employment Category: Active	Temporary				
Designation: SENIOR DRAWIN	NG MASTER	80001469-DISTRICT GOVERNMENT KHYBE			
DDO Code: DA6075-GCMHS	Fimergara				
Payroll Section: 001	GPF Section: 001 .	Cash Center:			
GPF A/C No: EDUDA008038	Interest Applied: Yes	GPF Balance:	829,621.00		
Vendor Number: -					
Pay and Allowances: Pay scale: BPS For - 2017		Pay Scale Type: Civil BPS	S: 16 Pay Stage: 21		
Waga type	Amount	Wasster			

	Wage type	Amount	Wage type		Amount
0001	Basic Pay	50,830.00	1000	House Rent Allowance	2,727.00
1924	UAA-OTHER 20%(16 G/NG)	1.500.00	1947	Medical Allow 15% (16-22)	2,160.00
2148	15% Adhoc Relief All-2013	1,180.00	2199	Adhoe Relief Allow @10%	789.00
2211	Adhoc Relief All 2016 10%	4.020.00	2224	Adhoc Relief All 2017 10%	5.083.00
2247	Adhoc Relief All 2018 10%	5,083.00			0.00

Deductions - General

	Wage type	Amount	Wage type	Amount
3016	GPF Subscription - Rs3340	-3,340.00	3501 Benevolent Fund	-800.00
3609	Income Tax	-100.00	3990 Emp.Edu. Fund KPK	-1.50.00
4004	R. Benefits & Death Comp:	-1,089.00		0.00

Deductions - Loans and Advances

Loan	Descrip	otion	Principal amount	Deduction	Balance
Deductions Payable:	s - Income Tax 2,000.00 Recovered	d till January-2019:	700.00 Exempte	d: 800.00 Recover	able: 500.00
Gross Pay	(Rs.): 73,372.00	Deductions: (Rs.):	-5,479.00	Net Pay: (Rs.): 67	,893.00
	e: ZAFAR IQBAL				
	umber: PLS 3777-6 ils: THE BANK OF KHYB	ER, 080029 TIMARGA	RA LOWER DIR TIM	IARGARA LOWER DIR,	, Lower Dir
Bank Detai		ER, 080029 TIMARGA Availed:	RA LOWER DIR TIN Earned:	IARGARA LOWER DIR, Balance:	, Lower Dir
Bank Detai	IIS: THE BANK OF KHYB	Availed:			, Lower Dir
Bank Detai	Opening Balance:	Availed:	Earned:	Balance:	
Bank Detai Leaves: Permanent	Opening Balance: Address: VILL.SPANKHA	Availed:	Earned: yber Pakhtunkhwa		

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(265994/26.01.2019/13:55:25) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Dist. Govt. NWFP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (September-2020)



Personal Information of Mr ZAFAR IQBAL d/w/s of MUHAMMAD AKBAR JAN

Personnel Number: 00266881 CNIC: 10990014837 Date of Birth: 15.04.1969

Entry into Govt. Service: 05.10.1989

NTN: Length of Service: 30 Years 11 Months 027 Days

Employment Category: Active	Temporary			
Designation: SENIOR DRAWIN	80001469-DISTRICT GOVERNMENT KHYBE			
DDO Code: DA6075-GCMHS 1	limergara	I		
Payroll Section: 001	GPF Section: 001	Cash Center:		
GPF A/C No: EDUDA008038	Interest Applied: Yes	GPF Balance:	· 1,	,128,339.00
Vendor Number: -		•	~	•
Pay and Allowances:	Pay scale: BPS For - 2017	Pay Scale Type: Civil	BPS: 16	Pay Stage: 22

	Wage type	Amount	Wage type	Amount
0001	Basic Pay	52,350.00	1000 House Rent Allowance	2,727.00
1210	Convey Allowance 2005	5,000.00	1924 UAA-OTHER 20%(16 G/NG)	1,500.00
1947	Medical Allow 15% (16-22)	2,160.00	2148 15% Adhoc Relief All-2013	1,180.00
2199	Adhoc Relief Allow @10%	789.00	2211 Adhoc Relief All 2016 10%	4,020.00
<u>222</u> 4	Adhoc Relief All 2017 10%	5,235.00	2247 Adhoc Relief All 2018 10%	5,235.00
2264	Adhoc Relicf All 2019 10%	5,235.00		0.00

Deductions - General

	Wage type	Amount		Wage type	Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-800.00
3609	Income Tax '	-1,329.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances.

Loan	Des	cription	Principal amount	Deduction	Balance
Deductions Payable:	5 - Income Tax 21,258.55 Recov	ered till September-2020:	3,987.00 Exempted:	5314.24 Recovera	ble: 11,957.31
Gross Pay	(Rs.): 85,431.00	Deductions: (Rs.):	-6,269.00	Net Pay: (Rs.): 79,3	162.00
Account N	ne: ZAFAR IQBAL umber: PLS 3777-6 ils: THE BANK OF KH	YBER, 080029 TIMARGA	RA LOWER DIR TIMA	RGARA LOWER DIR,	Lower Dir
Leaves:	Opening Balance:	Availed:	Earned:	Balance:	
Permanent	Address: VILL.SPANK	HARO			
City: DIR I Temp, Add	LOWER	Domicile: NW - Kh	yber Pakhtunkhwa	Housing Status:	No Official
City:		Email:			
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(265994/24.09.2020/14:09:16) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Annexure D

The Director, (E&SE) Department,

Khyber Pakhtunkhwa, Peshawar.

SUBJECT: DEPARMENTAL APPEAL AGAINST THE IMPUGNED ACTION OF THE CONCERNED AUTHORITY BY 1 ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE DURING WINTER & SUMMER VACATIONS.

Respected Sir,

То

With due respect it is stated that I am the employee of your good self-Department and is serving as SDA (BPS-16) quite efficiently and up to the entire satisfaction of the superiors. It is stated for kind information that conveyance allowance is admissible to all the Civil Servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. Later on vide revised Notification dated 20.12.2012 whereby the conveyance allowance for working in BPS-16 to 19 have been treated under the previous Notification by not enhancing their conveyance allowance. Respected sir, I was receiving the conveyance allowance as admissible under the law and rules but the concerned authority without any valid and justifiable reasons stopped/deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. One of the employee of education department in Islamabad filed service appeal No.1888 (R) CS/2016 before the federal service tribunal, Islamabad regarding conveyance allowance which was accepted by the honorable service tribunal vide its judgment dated 03.12.2018. That I also the similar employee of education department and under the principle of consistency I am also entitled for the same treatment meted out in the above mentioned service appeal but the concerned authority is not willing to issue/grant the same conveyance allowance which is granted to other employees. Copy attached. I am feeling aggrieved from the action of the concerned authority regarding deduction of conveyance allowance in vacations period/months preferred this Departmental appeal before your good self.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the concerned authority may very kindly be directed the conveyance allowance may not be deducted from my monthly salary during the winter & summer vacations. Copy

Dated: 16.08.2020

Zafar Johal

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PST (BPS 16) in GCMHS Timergara Dir Lower

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRUS PESHAWAR

APPEAL NO. 1452 12019

Mr. Magsad Hayat, SCT (BPS-16), GHS Masho Gagar, Peshawar

APPELLAN

VERSÜŚ

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar
- 3- The Secretary Finance Department Knyber Pakhtunkhwa Peshawar
- 4- The Accountant General; Khyber Pakhtunkhwa; Peshawar.
- 5- The Director (E&SE) Department Khyber Pakhtunkhwa Peshawar. RESPONDENTS

APPEAL UDNER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE THE APPELLANT DURING WINTER & SUMMER VACATIONS AND AGAINST NO ACTION TAKEN ON THE OF DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE

STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the respondents may kindly be directed not to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the payment of all outstanding amount Conveyance allowance which have been deducted vedte-day previously with all back benefits. Any other remedy which

this august Tribunal deems fit that may also be awarded in Registrar favor of the appellant.

R/SHEWETH:

-4-1-101:19

NCe Tribunal

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ATTES TON FACTS: -1- That the appellant is serving in the elementary and secondary education department as Certified Teacher (BPS-15) quite efficiency

Factor and up to the entire satisfaction of the superiofs.

2- That the Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No. FD. (PRC) 1/2011 dated 14.07.2011 was issued. That later ion vide revised wooffcation dated 20.12.2012 whereby the conveyance allowince for employees

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Counsel for the acpellant present

11.2019

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Pesbawa

Learned counsel referred to the Jüdgment passed by learned Federals Service Tribunal in Appeal No. 1888(R)CS/2016 which was handed down on 03.12.2018 Through the said Jüdgment the issue of payment of conveyance. Allowance, to a civil servint during summer and winter vacations was held to be within his entitlement, and the deduction already made from thim was to be reimbursed. Similar reference was made to the judgment by Honourable Peshawar High Court passed on 01.10-2019 in the case of appellant.

Learned counsel, when confronted with the proposition that the issue, in essence; was dilated upon by the Federal Service Tribunal and; more particularly, by the Honourable Peshawar High Court in the case of appellant, stated that in case the respondents are required to execute the judgment of Peshawar High Court, the appellant will have no cavil about disposal of instant appeal.

The record suggests that while handing down judgment in the Writ Petition preferred by the appellant, the Honourable High Court notionly expounded the definition of "Bay" as well as Salary", but also entitlement of a civil servant for the Conveyance Allowance, during the period of vacations. It is important to note that the respondents were represented before the High Court, during the proceedings.

In view of the above noted facts and circumstances and in order to protect the appellant from a fresh round of litigation which may protract over a formidable period, the appeal in hand is disposed of with observation that the judgment of Honourable Peshawar High Court passed in Writ Petitions including W.P. No. 3162-P/2019 shall be honourad and implemented by the respondents within shortest possible time. The appellant shall, however, be at liberty to seek remedy in accordance with law in case his grievance is not redressed by the respondents within a reasonable time.

File be consigned to the record

ANNOUNCEÉ 1.11.2019

المعد المستين حراك المسلم المسلم المراج المراج المسلم المسلم المسلم المسلم المسلم المسلم المسلم المسلم المسلم And have been with Grout of KPAJEte plin. Zafax Igbal July (500) will on minut ou مت يدن معنوان بالامين ابني للرضيب واسط يبرحني وحوار، دمي دكل كاروا في متعلقة المامقام لينادر سيديع في الحال اله على في فان اله على في المن المريث المريث المريك المريك إطراب المريك المريك المريك ا تموضوف فومقصري أل كارواني كاكابل أيضا بالمركزا يستروك معاص كركرية دامني الروا وتسالمت وتشبهها برطف مين جوار وملى اور المرابي المراجع والمربع المرابي المرابي الدر وصولى جراب وروميه الدرسي المعري الدر الرجوان برت مرتب من تقدرين اين اين ميشية تحدل كمان بالفاتيار تنبيجًا يسر ليصور برعام بسرجري يا دلكري كمطرفير با ايل كي ترايد عي ادر سنتم المبرية مرينة المركن ولمنازاتي ومبريري مرينة كالأغليات يرشكا ادربهم أربيه متورية متعديه بنائيه م من الجزيدي من داري من دارية الموري من المنار على المنار قالون كور المنه بمراح ما ابنى بما المن من المن مراجع ا ورجاع بينفرية المي موجن في جمار مذكرو بالا الفته إلى حاص عاص ترب المراس المي خب برفيا خنه منطول فترك بيجيلا ودواني مقدمهان جو خرجه وترجان التوارمة شرك سيب في التي مستحق فرك مساحب متريشته وماسيم تريز بعايا وطريب كما وسول كتبية كالعبى اختيار فيجما أتركوني قارائح يستى متقاتم ويرده ير بنی با مدست المر بن أو وكيل صاحب با بند مريزل من كه بسروك مذكور كري . للملا دكالمت تأمه كتع وماكم سندست ر ممار کی مرد ساق طن او خل رود و قرر الله الم ور 03338522332 63018521721