

ON FACTS

1. Contents need no reply, however contents of Para 1 of the appeal are true and correct.
2. Contents need no reply, however contents of Para 2 of the appeal are true and correct.
3. Contents need no reply, however contents of Para 3 of the appeal are true and correct.
4. Contents need no reply, however contents of Para 4 of the appeal are true and correct.
5. Contents need no reply, however contents of Para 5 of the appeal are true and correct.
6. Contents need no reply, however contents of Para 6 of the appeal are true and correct.
7. Contents of Para No. 7 to the extent of appointment and taking charge of the appellant being admission hence need no comments, rest of the reply submitted by the respondents to the Para is incorrect. Moreover Contents of Para 7 of the appeal are true and correct.
8. Contents of Para-8 of the appeal are correct, the reply submitted to the Para is incorrect and misleading, the respondents were required under the law and rules to consider the request of the appellant and to relieve him.
9. Contents of Para-9 of the appeal are correct, the reply submitted to the Para is incorrect and misleading. The appellant validly requested that his resignation be considered as a request for relieving him for service in order to join his new assignment.
10. Contents of Para-10 to the extent of submission of departmental appeal being admission need no comments, however it was regretted without any legal substance.
11. Contents of Para-11 of the appeal are correct, the reply submitted to the Para is incorrect and misleading.


GROUNDS

The Grounds (A to F) taken in the memo of appeal are legal and will be substantiated at the time of arguments.


It is therefore humbly prayed that the appeal of the appellant may please be accepted as prayed for.


Appellant

Through


IJAZ ANWAR
Advocate, Peshawar.

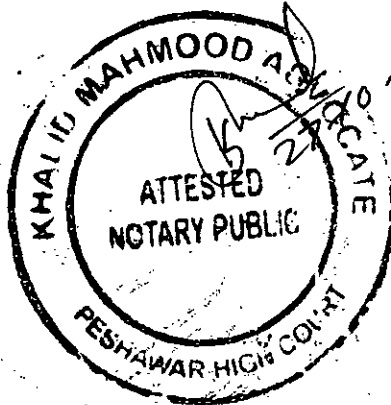
&


SAJID AMIN
Advocate, Peshawar.

AFFIDAVIT

I do, hereby solemnly affirm and declare on oath that the contents of the above rejoinder as well as titled appeal are true and correct and nothing has been kept back or concealed from this Honourable Tribunal.


Deponent





106

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

**SUMMARY FOR CHIEF MINISTER,
KHYBER PAKHTUNKHWA**

SUBJECT: - RESIGNATION FROM SERVICE.

Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan has submitted resignation from Govt. service in this Department w.e.f. 10.10.2014 (F / A).

2. The above named officer applied through proper channel for the post of Registrar at Abdul Wali Khan University Mardan (F / B). He has been selected as Registrar (F / C). To join his new assignment, he has submitted resignation from the post of Assistant Professor in this Department.

3. Principal, GDC No. 2 Mardan has certified that the officer concerned is neither involved in any disciplinary case nor any inquiry is pending against him (F/D).

4. Higher Education Department proposes that the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan may be accepted w.e.f 10.10.2014.

5. Proposal in Para 4 above is submitted for approval of the Chief Minister, Khyber Pakhtunkhwa.

MINISTER OF HIGHER EDUCATION.

**CHIEF SECRETARY,
KHYBER PAKHTUNKHWA.**

**CHIEF MINISTER,
KHYBER PAKHTUNKHWA.**

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

9/2015
Proposed approved

MUSHTAQ AHMAD CHANIL
Minister For Higher Education & Information
Khyber Pakhtunkhwa

P.T.O

7- Summary for Chief Minister examined. The Principal, GDC No.2 Mardan has certified that the officer is neither involved in any disciplinary case nor any inquiry is pending against him and that no government dues are outstanding against him (E/D).

(18)

8. The proposal of Higher Education Department contained in Para-4 is endorsed for approval of the competent authority ((Chief Minister).

cccc

(Dr. Akhtar Nazir)
Secretary Establishment
May 26, 2015

Chief Secretary, Khyber Pakhtunkhwa.

Chief Minister

Ali
29/5/15

Chief Secretary
Govt of Khyber Pakhtunkhwa

9. Para 4 is approved.

CP

Pervez
02/06/15
CHIEF MINISTER
KHYBER PAKHTUNKHWA

Ali
3/6/15

Chief Secretary
Govt of Khyber Pakhtunkhwa

SECRETARY HIGHER EDU:

For. 2013

DS. (C)

2
4/6



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

Dated Peshawar the June 08th, 2015.

NOTIFICATION

NO. SO(COLLEGES-II)HED/13-9/2010: The Competent Authority is pleased to accept the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BPS-18), Govt. Degree College, No. 2 Mardan w.e.f 10.10.2014 (A.N).

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

A copy of the above is forwarded to the:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal, Govt. Degree College, No. 2 Mardan.
3. District Account Officer Mardan.
4. Officer concerned.

Rukhsana Jabeen
(Rukhsana Jabeen)
SECTION OFFICER (COLLEGES-II)

9/6/15

To

The Director Higher Education (Colleges)
Khyber Pakhtunkhwa, Peshawar

Through: Proper Channels

Subject: Appointment of Mr. Sher Alam Khan, AP (English) HED as Registrar,
Abdul Wali Khan University, Mardan on regular basis

Sir,

I have the honour to state that I have been appointed as Registrar, Abdul Wali Khan University, Mardan vide Notification No. (1)-Reg-1/AWKUM/2014/1130, dated August 19, 2014 (copy enclosed). It is pertinent to mention here that in response to my request dated December 16, 2013 an NOC was issued in the matter by Dy. Director Higher Education (Colleges) vide No. 619/CA-J/Estt:Branch/A-12/Sher Alam Khan/English, dated 08/01/2014.

Now it is requested that I may kindly be allowed to submit my resignation w.e.f 10th October, 2014 (A.N) to join my new assignment at Abdul Wali Khan University, Mardan please.

Regards,



Sher Alam Khan
AP, English (On deputation)
University of Swabi



Office of the Registrar, University of Swabi

Phone Off. 0938-490236

Fax No. 0938-490238

registrar@uoswabi.edu.pk

Endst: No. 1(5)-Reg-1/UOS/2014/3064

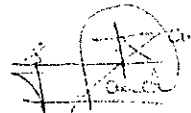
Oct 10, 2014

Forwarded, in original, to Director Higher Education (Colleges), Khyber Pakhtunkhwa, for favourable consideration and initiating process of resignation in order to join his new assignment at Abdul Wali Khan University, Mardan please. This may be considered as advance notice and the officer will be relieved upon expiry of one month notice please,

Assistant Registrar
(Establishment)

Copy to:

1. PS to Secretary, Higher Education Department, Peshawar
2. Principal, Govt. Degree College No 2, Mardan for information and necessary action, if any,
3. District Accounts Officer, Mardan
4. Section Officer (Colleges-I), HED, Peshawar
5. PS to Vice Chancellor, AWKUM
6. PS to Vice Chancellor, UOS
7. Officer concerned
8. Personal File



Assistant Registrar
(Establishment)

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In the matter of
Appeal No. 87/2016

Sher Alam Khan, Ex- assistant Professor (English), Higher Education Department, presently Registrar Abdul Wali Khan University Mardan.

(Appellant)

VERSUS

Govt. of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa Peshawar others.

(Respondents)

REJOINDER TO THE PARA WISE REPLY ON
BEHALF OF THE APPELLANT

Respectfully submitted:

The appellant submits his rejoinder as under:

ON PRELIMINARY OBJECTIONS:

1. Contents incorrect and misleading, the appellant has got the locus standi and cause of action to file the instant appeal.
2. Contents incorrect and misleading, the appellant has come to the Tribunal with clean hands.
3. Contents incorrect and misleading, no rule of estoppel is applicable to the instant case.
4. Contents incorrect and misleading, nothing has been concealed from this Honorable Tribunal.
5. Contents incorrect and misleading, all the parties necessary for the disposal of the appeal are arrayed in the instant appeal.

ON FACTS

1. Contents need no reply, however contents of Para 1 of the appeal are true and correct.
2. Contents need no reply, however contents of Para 2 of the appeal are true and correct.
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10. Contents of Para-10 to the extent of submission of departmental appeal being admission need no comments, however it was regretted without any legal substance.
11. Contents of Para-11 of the appeal are correct, the reply submitted to the Para is incorrect and misleading.

GROUND

The Grounds (A to F) taken in the memo of appeal are legal and will be substantiated at the time of arguments.

It is therefore humbly prayed that the appeal of the appellant may please be accepted as prayed for.

Appellant

Through

IJAZ ANWAR
Advocate, Peshawar.
&

SAJID AMIN
Advocate, Peshawar.

AFFIDAVIT

I do, hereby solemnly affirm and declare on oath that the contents of the above rejoinder as well as titled appeal are true and correct and nothing has been kept back or concealed from this Honourable Tribunal.

Deponent

POWER OF ATTORNEY

In the Court of Khyber Pakhtunkhwa Special Tribunal
Shah Alam

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of KPIC and others.

} Defendant
} Respondent
} Accused

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/We, the undersigned, do hereby nominate and appoint

YASIR SALEEM ADVOCATE, HIGH COURT

_____ my true and lawful attorney, for me in my same and on my behalf to appear at _____ to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____


YASIR-SALEEM

VAKALAT NAMA

Appel NO. 87. /2016.

IN THE COURT OF Service Tribunal Peshawar.

Sher Alam Khan

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Court of J & Pk etc.

(Respondent)
(Defendant)

I/We, Sher Alam Khan (Appellant).

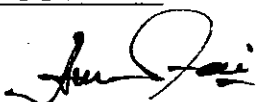
Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.


Dated _____/20


(CLIENT)

ACCEPTED


M. ASIF YOUSAFZAI
Advocate Supreme Court
Peshawar.


Taimur Ali Khan
Advocate High Court


Syed Nauman Ali Bukhari
Advocate

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)

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

No. SO (C-II)HED/13-9/2010/Sher Alam.
Dated Peshawar the 17.06.2015.

To

2988-3000

Mr. Sher Alam Khan,
Registrar University of Swabi,
Swabi.

**SUBJECT: - APPOINTMENT OF MR. SHER ALAM KHAN AP OF
ENGLISH HED AS REGISTRAR, ABDUL WALI KHAN
UNIVERSITY MARDAN ON REGULAR BASIS.**

I am directed to refer to your letter No. F.NO1(1)-Reg-2/UOS/2015/3907 dated 27.05.2015 on the above noted subject and to state that your request for relieving instead of resignation cannot be entertained in light of Establishment Department's Notification No. SOR.VI(E&AD) 1-11/2003 dated 29.07.2006 (copy enclosed).

Handwritten initials or mark.

Rukhsana Jabeen
(RUKHSANA JABEEN)
SECTION OFFICER (COLLEGES-II)

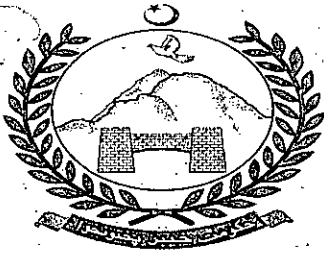
Endst: No. & Date Even.

A copy of the above is forwarded for information to Directorate of Higher Education Department.

Handwritten notes: *MS/A-0*, *24/6/15*, *24/6*

Rukhsana Jabeen
SECTION OFFICER (COLLEGES-II)

Stamp: *CAI*
RECEIVED ON
25 JULY 2015
7809 / 509



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

Dated Peshawar the June 08th, 2015.

NOTIFICATION

NO. SO(COLLEGES-II)HED/13-9/2010: The Competent Authority is pleased to accept the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BPS-18), Govt. Degree College, No. 2 Mardan w.e.f 10.10.2014 (A.N).

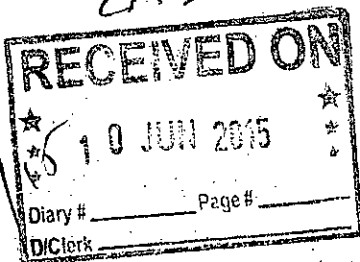
SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

A copy of the above is forwarded to the:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal, Govt. Degree College, No. 2 Mardan.
3. District Account Officer Mardan.
4. Officer concerned.

Rukhsana Jabeen
(Rukhsana Jabeen)
SECTION OFFICER (COLLEGES-II)





**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR**

Phone # 091-9210242, 9211025/Fax # 921021

No. *64* / CA-1/ Estt: Branch /A-12/Sher Alam Khan/English

Dated Peshawar the *08/01* /2014

To

The Registrar
Abdul Wali Khan University, Mardan.

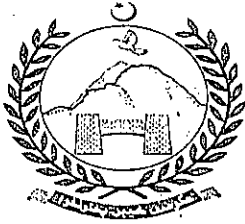
SUBJECT DEPARTMENTAL PERMISSION.
Memo:

I am directed to refer to the subject cited above and to state that this Directorate has no objection on applying to the post of Registrar in respect of Mr. Sher Alam Khan Assistant Professor of English, presently, working as Deputy Project Director/ Acting Registrar at University of Swabi on deputation basis.

Endst; No. *620* / *DL* **DY: DIRECTOR (ESTABLISHMENT)**
su

Copy of the above is forwarded to the Assistant Registrar University of Swabi with reference to his Endst: No. 1242 dated 16.12.2013 with the remarks that in case of selection of the officer concerned against the post applied for, he will have to resign from the present post and his lien will not be retained in this Department.

DL **DY: DIRECTOR (ESTABLISHMENT)**
su



56 ANNEX - IV
Page 366 of 368

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

No. SO (C-II)HED/13-9/2012/Sher Alam.
Dated Peshawar the 01.12.2015.

To

The Registrar,
Abdul Wali Khan University Mardan.

SUBJECT: APPEAL AGAINST RESIGNATION, NOTIFICATION NO. SO(COLLEGES-II)/HED 13-9/2010.

I am directed to refer to your letter No. Nil dated 06-10-2015 on the subject noted above and to state that the Competent Authority has regretted your appeal regarding the withdrawal of the resignation tendered by you in light of Establishment Department circular letter No. S&GAD No. SO XII/2-96/59 dated 24.12.59 wherein it has been clearly mentioned that:

"When a resignation tendered by a Govt. Servant has been accepted and the acceptance has been communicated to him, it becomes final. There is no question of allowing him to withdraw the resignation." (Copy of the letter enclosed)

Rukhsana Jabeen.
(RUKHSANA JABEEN)
SECTION OFFICER (COLLEGES-II)

YJ

55
YANFA-M

The Secretary to Government of Khyber Pakhtunkhwa,
Higher Education Department, Peshawar.

Subject: Appeal against resignation Notification No: SO(COLLEGES-II) HED/13-9/2010
Dated: June 8th, 2015, received on 30th June, 2015

I have the honour to state that I was appointed as Registrar, Abdul Wali Khan University Mardan on regular basis. The Higher Education Department notified my resignation Vide No: (COLLEGES-II) HED/13-9/2010 Dated: June 8th, 2015 received on 30th June, 2015. In this regard I wish to say the following points:

I have completed 22 year 7 months service and am qualified for premature retirement as per government rules. I requested my parent department to consider my case on deputation or I may be allowed lien in the case.

Now I have received resignation notification, I requested the Vice Chancellor /Chairperson Syndicate, AWKUM to place my case before the Syndicate for protection of my pension and other benefits as admissible under the Statutes of the University. The case will be discussed in the Syndicate on 9th July, 2015.


I have, therefore, requested that implementation in the case may not be initiated and I may not be debarred off the Parent Department till the decision of the Syndicate. In case of non-confirmation of pension protection, the Competent Authority may be approached kindly to withdraw my resignation or its acceptance on merit basis as admissible under the rules Vide Estt. Division. O.M. No.8/1369-1, dated 30-1-1970 read with Estt. Division O.M.No.6/9/79-D.I, dated 19-6-1979 which state:

"Withdrawal of resignation after its acceptance but before it become effective i.e. before the government servant concerned is relieved. It should be open to the Authority accepting the resignation to allow the government servant concerned to withdraw the resignation on merit of the case".

I have, therefore, requested that my appeal may be considered/processed for withdrawal of the resignation, after its acceptance, in case of non-confirmation of pension protection by the Syndicate in the case.

Submitted for favourable consideration, please,

In many regards,


Sher Alam Khan
A/P English, HED
Registrar, AWKUM.

Copy to:

- Director Higher Education Colleges, Khyber Pakhtunkhwa.
 - Principal Government Degree College No .2 Mardan.
 - District Accounts Officer Mardan.
 - PS to Chief Secretary Khyber Pakhtunkhwa
 - PS to Vice Chancellor, AWKUM
 - Deputy Secretary Colleges, HED
 - Section Officer (Colleges-II)
 - Personal File
- A



UNIVERSITY
of
SWABI

UNIVERSITY OF SWABI 78

Phone No. 0938-490236, Fax No. 0938-490238
www.uoswabi.edu.pk

F. No. 1(1)-Reg-2/UOS/2015/3906

To,

The Secretary,
Higher Education Department,
Khyber Pakhtunkhwa.

Subject: APPOINTMENT OF MR. SHER ALAM KHAN, AP (ENGLISH),
AS REGISTRAR, ABDUL WALI KHAN UNIVERSITY, MARDAN
REGULAR BASIS

Sir,

Reference may be made to this office letter Vide No: 1(5)-
1/UOS/2014/ 3269 dated December 10, 2014 addressed to Deputy Director Colleges
on the subject noted above. In this regard the officer's request for resignation from
HED endorsed Vide No: 1(5)-Reg-1/UOS/2014/3064 dated October 10, 2014 may
be considered and read as relieving from service in order to join his new
assignment at AWKUM w.e.f October 10, 2014 afternoon.

This is important because the officer concerned applied through proper
channels and NOC was issued from Director Colleges, HED in this regard.

Submitted for favour of relieving instead of resignation, please.

With Kindest Regards,

Registrar

Copy to:

1. Director Higher Education Colleges.
2. PS to Minister Higher Education.
3. PS to Chief Secretary.
4. PA to Principal Secretary, Chief Minister's Secretariat.
5. PS to Vice Chancellor.
6. Deputy Secretary Colleges.
7. Section Officer Colleges (SO-I).
8. PA to Registrar, Abdul Wali Khan University, Mardan.
9. Personal File.


fr Registrar



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

**SUMMARY FOR CHIEF MINISTER,
KHYBER PAKHTUNKHWA**

SUBJECT: - RESIGNATION FROM SERVICE.

Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan has submitted resignation from Govt. service in this Department w.e.f. 10.10.2014 (F / A).

2. The above named officer applied through proper channel for the post of Registrar at Abdul Wali Khan University Mardan (F / B). He has been selected as Registrar (F / C). To join his new assignment, he has submitted resignation from the post of Assistant Professor in this Department.

3. Principal, GDC No. 2 Mardan has certified that the officer concerned is neither involved in any disciplinary case nor any inquiry is pending against him (F/D).

4. Higher Education Department proposes that the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan may be accepted w.e.f 10.10.2014.

5. Proposal in Para 4 above is submitted for approval of the Chief Minister, Khyber Pakhtunkhwa.

MINISTER OF HIGHER EDUCATION.

**CHIEF SECRETARY,
KHYBER PAKHTUNKHWA.**

**CHIEF MINISTER,
KHYBER PAKHTUNKHWA.**

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

6.

Proposed approved

MUSHTAQ AHMAD GHANI
Minister For Higher Education & Information
Khyber Pakhtunkhwa

P.T.O

7. Summary for Chief Minister examined. The Principal, GDC No.2 Mardan has certified that the officer is neither involved in any disciplinary case nor any inquiry is pending against him and that no government dues are outstanding against him (F/D).

103

8. The proposal of Higher Education Department contained in Para-4 is endorsed for approval of the competent authority (Chief Minister).

cccccc
(Dr. Akhtar Nazir)
Secretary Establishment
May 23, 2015

Chief Secretary, Khyber Pakhtunkhwa.

Chief Minister

AW
-9/5/15
Chief Secretary
Govt of Khyber Pakhtunkhwa

9. Para 4 is approved.

CP

Pencer
02/06/15
CHIEF MINISTER
KHYBER PAKHTUNKHWA

AW
3/6/15
Chief Secretary

SECRETARY HIGHER EDU:

For. 2013

AS (C)

27/6/16

Before me Service Tribunal, P.M.
SA-NO. 87/2016.

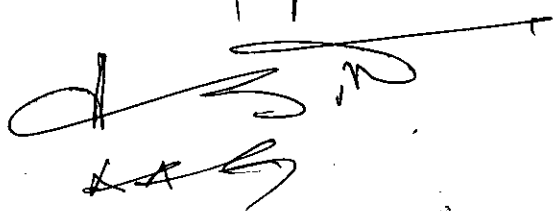
Shri Alam: VS Govt of K.P.K.

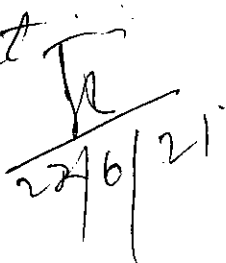
Applicant for placing attached
Documents with Application on
file for conclusion of the
Case and in Interest of Justice

Respectfully Shri Alam:

That as per direction
of this Honorable
Tribunal the requisite
documents were Directorate of Higher
Edu. Deptt. - K.P.K.
Jehanzab
22/11/21

It is therefore requested to
kindly place on file of the instant appeal
Applicant


Shri Alam


22/6/21



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

Dated Peshawar the June 08th, 2015.

NOTIFICATION

NO. SO(COLLEGES-II)HED/13-9/2010: The Competent Authority is pleased to accept the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BPS-18), Govt. Degree College, No. 2 Mardan w.e.f 10.10.2014 (A.N).

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

A copy of the above is forwarded to the:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal, Govt. Degree College, No. 2 Mardan.
3. District Account Officer Mardan.
4. Officer concerned.

Rukhsana Jabeen
(Rukhsana Jabeen)
SECTION OFFICER (COLLEGES-II)

WAKALAT NAMA

IN THE COURT OF Khyber Pakhtunkhwa Saria Tribunal
Shah Alam Khan Ex parte

Appellant(s)/Petitioner(s)

VERSUS

Court. KP. Through Chief Secretary & others

Respondent(s)

I/We Shah Alam Khan do hereby appoint
Mr. Khush Dil Khan, Advocate Supreme Court of Pakistan in the above
mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

Khush Dil Khan,
Advocate,
Supreme Court of Pakistan
9-B, Haroon Mansion
Off: Tel: 091-2213445

Signature of Executants

DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR

Phone No.091-9211025, 9210242, 92102117 Fax No.9210215

(Estt:Branch)

Dated 30/9/2010

To

The Section Officer (Colleges)
Higher Education Department
Peshawar.

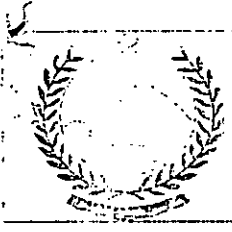
Subject: RELINQUISH OF CHARGE.

Dear Sir,

I am directed to enclose herewith a self explanatory application in r/o Mr. Sher Alam Khan A/P of English GC Peshawar alongwith copy of charge relinquishing report for necessary action with the remarks that the above mentioned officer has been appointed as Registrar University of Swat on deputation basis for a period of three years vide Notification No.SO(U)HE/9-5/2010 dated 28.09.2010 (copy enclose). Now he has requested to relieve him of his duties to join the said university and relinquished the charge on 30.09.2010 (A.N).

DEPUTY DIRECTOR (ESTABLISHMENT)
HIGHER EDUCATION, PESHAWAR

94
P.O.-F.
J
22/06/21
(Twenty Five sheets)



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

Dated Peshawar the October 08th, 2010.

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NOTIFICATION

No. SO(COLLEGES)/02-2010/R-1/2010. Consequent upon his appointment as Registrar, University of Swat on deputation basis, the Competent Authority is pleased to allow Mr. Sher Alam Khan, Assistant Professor of English (BS-18), Govt. College, Peshawar to relinquish the charge of Assistant Professor w.e.f. **30.09.2010 (A.N)**

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date as above.

Copy forwarded to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa Peshawar. w/r to his letter No. 26944/Estt. Branch dated 30.09.2010.
3. Principal, Government College, Peshawar.
4. District Accounts Officer, Peshawar.
5. Deputy Director (IT), Planning Cell, Higher Education Department.
6. Officer concerned.

GA
(GHULAM ALI)
SECTION OFFICER (COLLEGES)

o/c

[Signature]
14/10



96
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GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

Dated Peshawar the 09.03.2011.

NOTIFICATION

No. SO (COLLEGES)/01-2011/X-4/2010. The Competent Authority is pleased to order the settlement of terms and conditions of deputation in respect of Mr. Sher Alam Khan, Assistant Professor of English (BS-18), Govt. College, Peshawar presently working as Registrar, University of Swat w.e.f. 10-2-2010 follows:-

1. Pay:- The pay in BPS-18 as admissible to him in his parent Department.
2. DEPUTATION ALLOWANCE:- Deputation allowance @ 20% of the basic pay subject to maximum of Rs. 5000/-P.M.
3. SPECIAL PAY:- He is allowed Special Pay @ Nil.
4. TRAVELLING ALLOWANCE:- will be allowed in accordance with the ordinary T.A Rules of the Govt. or borrowing organization, whichever is more beneficial to him.
5. CONVEYANCE ALLOWANCE:- This will be restricted to the scale as admissible under the Government rules subject to the relevant conditions.
6. COMPENSATORY ALLOWANCE:- As admissible to a Civil Servant at the same place of posting will continue to be admissible during deputation as per scale laid down by the Government. Hence, it will not be interchangeable with the Compensatory Allowance as sanctioned by the Borrowing Organization. However, the Borrowing Organization will bear the whole expenditure in respect of any compensatory allowance for periods of leave granted to the Civil Servant in or at the end of Foreign Service.
7. RESIDENTIAL ACCOMMODATION:- As per this Provincial Government Rules.
8. MEDICAL FACILITIES:- Medical facilities will be allowed in accordance with the relevant rules of the borrowing organization.
9. LEAVE/LEAVE SALARY:- Would be sanctioned/paid by the Borrowing Organization in accordance with Finance Department's Circular letter No. SO (SR-III) FD/4-112/73 dated 12.4.1982.
10. PENSION CONTRIBUTION:- Will be payable by the Borrowing Organization according to the Finance Department circular letter No. SOR-III/FD/ 4-112/73 dated 12.04.1982.
11. JOINING TIME PAY AND TA ON TRANSFER:- Will be payable by Borrowing Organization on transfer to and reversion from Borrowing Organization.
12. CONTRIBUTION:- He will continue to subscribe to the G.P. Fund, Benevolent Fund and Group Insurance under Govt. Rules and will also repay all the advances from G.P.Fund or from house Building etc by cash deposit in Government Treasury.



University of Swat

Saidu Sharif
Ph: (0946) 9240006 Fax: (0946) 726166
www.swatuniversity.edu.pk
info@swatuniversity.edu.pk

No. 619-701/UOS/PS

Dated: 24/08/2011

To,

Mr. Sher Alam Khan
Assistant Professor of Higher Education Department,
Peshawar

Subject: **LOSS OF CONFIDENCE - REPATRIATION OF THE REGISTRAR TO HIS PARENT DEPARTMENT, HIGHER EDUCATION DEPARTMENT, PESHAWAR**

R/Sir,

You are hereby informed that the undersigned had recommended your repatriation to your parent department vide letter No.359/UOS/VC dated 27th June, 2011, on the grounds mentioned therein, to the Governor Khyber Pakhtunkhwa/Chancellor University of Swat. The Honourable Chancellor was pleased to accede to the recommendations of the undersigned vide letter/order No.SO(HE)6(12)2/2010/2398-2400 dated 23/08/2011 (Photocopy enclosed).

You are, therefore, directed to abide by the orders of the worthy Chancellor, University of Swat, and join your parent department with immediate effect.

Encl: As above

Vice Chancellor
University of Swat

Encl: Even No. & date

Copy for information to:

1. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
2. PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
4. Secretary, Higher Education Department, Khyber Pakhtunkhwa, Peshawar for further necessary action at their end.
5. Commissioner, Malakand Division, Saidu Sharif, Swat.
6. Deputy Inspector General of Police, Malakand Region-III, Swat.
7. Civil Military Liaison Officer, Pak Army at Swat.
8. PS to Minister for Higher Education, Khyber Pakhtunkhwa, Peshawar.



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

No. SO (C) / X-4 / 2010
Dated Peshawar the 20.09.2011.

To

The Director,
Higher Education, Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: - DEPUTATION.

I am directed to refer to the subject cited above and to enclose herewith a copy of a letter No. 619-701/UOS/PS dated 24.08.2011 received from the Vice Chancellor, University of Swat addressed to Mr. Sher Alam Khan, Assistant Prof. of English and copy endorsed to this Department and to state that posting proposal of the above named officer may be sent where there is dire need of English teacher at the earliest please.

Encl: As above.


SECTION OFFICER (COLLEGES)

2/18
c/c

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

Dated Peshawar the 31.10.2011.

NOTIFICATION

NO. SO(COLLEGES)HED/X-4/2010. Consequent upon his return from deputation, the Competent Authority is pleased to order the adjustment of **Mr. Sher Alam Khan**, Assistant Professor of English (BPS-18) at Govt. Degree College, Shabqadar against the vacant post w.e.f. 08.10.2011.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN.

Copy forwarded to the: -

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar with reference to his letter No. 27382/CA-I/Estt. Branch dated 26.10.2011.
2. Principal, Govt. Degree College, Shabqadar, Charsadda.
3. District Accounts Officer, Charsadda.
4. Deputy Director (IT), Planning Cell, Higher Education Department.
5. Officer concerned.

(WAHEED KHAN)
SECTION OFFICER (COLLEGES-II)

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Recd. 31/10/11
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2/11/11

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

Dated Peshawar the 24.01.2012.

NOTIFICATION

NO. SO(COLLEGES)/13-9/2012. The Competent Authority is pleased to place the services of **Mr. Sher Alam Khan**, Assistant Professor of English (BPS-18), Government Degree College, Shabqadar, Charsadda at the disposal of Abdul Wali Khan University Mardan, on deputation basis initially for a period of three (03) years.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN.

Copy forwarded to the: -

- 25/1/12
1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
 2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
 3. Registrar, Abdul Wali Khan University, Mardan w/r to his letter No. 1(2)Reg-I(AWKUM/2011/4964 dated 08.11.2011. Enclosed Proforma of terms and conditions may be filled and submitted to this Department at the earliest.
 4. Principal, Government Degree College, Shabqadar, Charsadda.
 5. District Accounts Officer, Charsadda.
 6. Officer concerned.

(WAHEED KHAN)
SECTION OFFICER (COLLEGES-II)



**ABDUL WALI KHAN UNIVERSITY
MARDAN, PAKISTAN**

Phone No. 0937-9230518-9230504, Fax No. 0937-9230519

Registrar@awku.edu.pk
www.abwku.edu.pk

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105
100
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May 21, 2012

F.No. 1(2)-Reg-1/AWKUM/2012/6565

OFFICE ORDER

In continuation to this Office letter No. 1(1)-Reg-1/AWKUM/2012/6419, dated May 08, 2012, Mr. Sher Alam, Assistant Professor, Department of English, working on deputation is hereby relieved of his services at Abdul Wali Khan University Mardan, with immediate effect.


Deputy Registrar
(Establishment)

Copy to:

1. PS to Vice Chancellor
2. PS to Secretary, Higher Education Department, Government of Khyber Pakhtunkhwa
3. Officer concerned
4. Relevant Files


Deputy Registrar
(Establishment)



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

Dated Peshawar the 04.07.2012.

NOTIFICATION

NO. SO(COLLEGES-II)HED/13-9/2012. Consequent upon his repatriation by the Abdul Wali Khan University, Mardan, the Competent Authority is pleased to order the adjustment of **Mr. Sher Alam Khan**, Assistant Prof. of English (BPS-18) at Govt. Degree College, No. 2, Mardan against the vacant w.e.f. 22.05.2012.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN.

Copy forwarded to the: -

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 13120/CA-I/Estt. Branch dated 12.06.2012.
2. Principal, Govt. Degree College, No. 2, Mardan.
3. District Accounts Officer, Mardan.
4. Deputy Director (IT), Planning Cell, Higher Education Department.
5. Officer concerned.

(HABIB-UR-RAHMAN)
SECTION OFFICER (COLLEGES-II)

3
Received
Shir Alam
4/7/12

9/17



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

Dated Peshawar the 15.11.2012.

NOTIFICATION

NO. SO(COLLEGES)/13-9/2012. The Competent Authority is pleased to place the services of **Mr. Sher Alam Khan**, Assistant Professor of English (BPS-18), Government Degree College, No. 2, Mardan at the disposal of Abdul Wali Khan University, Mardan for posting as Deputy Project Director, Camp Office at Anbar Swabi on deputation basis initially for a period of one year, with immediate effect.

The terms and conditions of deputation will be settled later on.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

ENDST: NO. & DATE EVEN.

Copy forwarded to the: -

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Vice Chancellor, Abdul Wali Khan University, Mardan w/r to his letter No. 08-4/PS/AWKUM /2012/484 dated 07.11.2012.
3. Principal, Government Degree College, No. 2, Mardan for compliance.
4. District Accounts Officers, Mardan / Swabi.
5. Officer concerned with the request to fill in the proforma on Finance Department format (in triplicate) duly signed by the borrowing organization and furnish to this Department within 15-days of the issuance of this notification for settlement.

SECTION OFFICER (COLLEGES-II)

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Summary
for Chief
Minister,
KP

11



UNIVERSITY
SWABI

Phone Off. 0938-490236
Fax No. 0938-490238
registrar@uoswabi.edu

UNIVERSITY OF SWABI

Khyber Pakhtunkhwa, Pakistan

F. No. 1(3)-Reg-1/UOS/2014/2037

Aug 25, 2014

To

The Section Officer (Colleges),
Higher Education Department,
Peshawar.

Subject: Appointment of Mr. Sher Alam Khan as Registrar, Abdul Wali
Khan University, Mardan

Madam,

I have the honor to submit that Mr. Sher Alam Khan, Assistant Professor of English has been performing as acting Registrar (on deputation basis) at this university since November 16, 2012 till date. The officer concerned has been appointed as Registrar (BPS-20) on regular basis at Abdul Wali Khan University, Mardan vide Notification No. (1)-Reg-1/AWKUM/2014/1130, dated August 19, 2014 as per provision contained in the Khyber Pakhtunkhwa Universities Act.

It is, therefore, requested that Hon. Secretary may kindly be approached to allow him to join his new assignment at Abdul Wali Khan University, Mardan on deputation/lien basis as permissible under the rules. If agreed, he will be relieved off this office to join his new assignment at AWKUM please.

Regards,

Note: Officer order of appointment from AWKUM enclosed

Assistant Registrar
(Establishment)

Cc:

1. PS to Secretary, Higher Education Department, Peshawar
2. PS to Vice Chancellor, UOS
3. PS to Vice Chancellor, AWKUM
4. Section Officer (Colleges), HED, Peshawar
5. Master File

Assistant Registrar
(Establishment)

AB. pect 26/14

26/14

SA



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

No. SO (C-II)HED/13-9/2012/Sher Alam Khan.
Dated Peshawar the 24.09.2014.

To

The Vice Chancellor,
University of Swabi.


SUBJECT: **APPOINTMENT OF MR. SHER ALAM KHAN AS REGISTRAR, ABDUL WALI KHAN UNIVERSITY, MARDAN.**

Dear Sir,

I am directed to refer to the Registrar University of Swabi letter No. 1(3)-Reg-1/UOS/2014/2037 dated 25.08.2014 on the subject noted above and to state that Mr. Sher Alam Khan, Assistant Prof. of English is on the extended period of deputation as Deputy Project Director, Camp Office at Anbar Swabi University of Swabi w.e.f. 17.09.2013 to 16.09.2015 (Copy attached). Since the Officer is on deputation period and has neither intimated his parent department nor sought prior approval of the Competent Authority before his apply to Abdul Wali Khan University Mardan for the post of Registrar (BS-20), hence, he has violated the relevant rules.

I am further directed to correct that the said officer has been appointed for a term of three years, renewable from time to time, as prescribed in Section-13 of Khyber Pakhtunkhwa Universities Act, 2012 and not on regular basis as illustrated in your letter (copy enclosed).

It is, therefore, requested to you to not relieve him of his duties and submit his overall performance report and further call an explanation of him for concealing the material facts from University Syndicate.



% / L (ZAHID USMAN KAKA KHEL)
SECTION OFFICER (COLLEGES-II)

Endst: No. & Date Even.

Copy forwarded to the:-

- i. Sher Alam Khan, Assistant Professor of English / Deputy Project Director, Project Camp Office Anbar, University of Swabi / Registrar, Abdul Wali Khan University Mardan to explain the willful lapse of violating the rules and disregarding the Administrative Department being civil servant within seven days sharply.
- ii. P.S to Vice Chancellor, Abdul Wali Khan University, Mardan for comments.
- iii. P.S to Secretary, Higher Education Department.


% / L SECTION OFFICER (COLLEGES-II)


25/9/2014



ABDUL WALI KHAN UNIV
MARDAN, PAKISTAN
 Phone No. 0937-9230618, Fax No. 0937-9230619

116
 (S.S.)
 13

September 02, 2014

F.No. 1(5)-Reg-1/AWKUM/2014/11467

Section Officer (Colleges-II)
 Govt. of Khyber Pakhtunkhwa, Higher Education, Archives & Libraries Department
 Peshawar

Subject: APPOINTMENT OF MR. SHER ALAM KHAN AS REGISTRAR, ABDUL WALI KHAN UNIVERSITY MARDAN

Reference letter No. ^{PS2} SO(C-II)/HED/13-9/2012/Sher Alam Khan/724-26 dated September 24, 2014.

It is stated that the post of Registrar (BPS-20) was advertised by this University vide Advertisement No. 40 (2013) dated December 9, 2013 and Mr. Sher Alam Khan applied for the said post through proper channel, where departmental permission was given to him by Directorate of Higher Education Khyber Pakhtunkhwa, Peshawar vide Letter No. 619/CA-I/Estt: Branch/A-12/Sher Alam Khan/English dated January 8, 2014.

Furthermore, Mr. Sher Alam Khan has been appointed as Registrar on the recommendations of the 26th meeting of the Selection Board held on August 9-11, 2014 and subsequent approval of the Syndicate in its 10th Meeting held on August 18, 2014, for a term of three years as prescribed in Section-13 of Khyber Pakhtunkhwa Universities Act-2012 and the university has already issued corrigendum in the said office order (*Appointment letter and Corrigendum attached*).

2-8-14

[Signature]
 Registrar

Copy forwarded to:

1. PS to Vice Chancellor, AWKUM
2. PS to Secretary, Higher Education Department, Peshawar
3. Relevant file

[Signature]
 Registrar

[Faint stamps and handwritten notes at the bottom of the page]

9/11/14



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

No. SO (C-II)HED/13-9/2014/Sher Alam Khan,
Dated Peshawar the 17.11.2014.

17/11/14

To

The Director,
Higher Education, Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: **APPOINTMENT OF MR. SHER ALAM KHAN AS REGISTRAR,
ABDUL WALI KHAN UNIVERSITY, MARDAN.**

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith copy of letter No. 1(3)-Reg-1/UOS/2014/2037 dated 25.08.2014 received from the Assistant Registrar, University of Swabi which is self-explanatory with the request to furnish your comments / views in the matter, please.

The attached NOC / Departmental Permission may also be checked with the record and inform as to whether the said NOC was granted to the officer concerned or otherwise.

Encl:- As above.

o/c Yours faithfully,

(Signature)
(ZAHID USMAN KAKA KHEL)
SECTION OFFICER (COLLEGES-II)

Ends: No. & Date Even.

➤ Copy forwarded to the P.S to Secretary, Higher Education Department.

SECTION OFFICER (COLLEGES-II)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

NO. SO(U-II)/H.E/11-2/2013
Dated Peshawar the 9th February, 2015

To

The Director,
Higher Education, Khyber Pakhtunkhwa.

Subject: APPOINTMENT OF MR. SHER ALAM KHAN AS
REGISTRAR, ABDUL WALI KHAN UNIVERSITY, MARDAN.

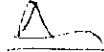
Dear Sir.

I am directed to refer to your letter No.31746/CA-I/Estt; Branch/A-12/Sher Alam Khan/English dated 19.12.2014 on the subject noted above and with reference to telephonic conversation of Amir Abdur Rehman, Ex-Deputy Secretary (Universities) with the administrative officer of the Directorate of Higher Education and to request you to kindly furnish the latest status of the subject case so that further necessary action may be taken accordingly.

(ASAD JAN)
Section Officer (Universities-II)

Copy to the:

1. PS to Secretary, Higher Education Department.
2. PA to Deputy Secretary (Colleges), Higher Education Department.


Section Officer (Universities-II)

672
19/2

DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR

No. 5278 Phone # 091-9210242, 9211025/Fax # 9210215
CA-1/ Est: Branch/ A-12/ Sher Alam Khan/ Englis.

Dated Peshawar the 25/2/2015

To

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

SUBJECT APPOINTMENT OF MR. SHER ALAM KHAN AS REGISTRAR,
ABDUL WALI KHAN UNIVERSITY, MARDAN.

Memo:

D-91

I am directed to refer to your office letter No. SO (UE-II) /HE/11-2/2013/2691 dated 09.02.2015 on the subject cited above and to enclose herewith a copy of a self-explanatory application in respect of Mr. Sher Alam Assistant Professor of English Govt; Post Graduate College, Mardan, presently, working in University of Swabi on deputation basis requesting therein for resignation from service w.e.f 10.10.2014 (A.N) alongwith a copy of letter No. F. No. 1 (5)-Reg-1/UOS/2014/3269 dated 10.12.2014 received from the Assistant Registrar (Establishment) University of Swabi for necessary action with the remarks that the resignation from service tendered by the above-mentioned officer w.e.f 10.10.2014 (A.N) may be considered as per rules, please.

[Handwritten signature]

BY: DIRECTOR (ESTABLISHMENT)

Encls: No. 1

Copy of the above is forwarded to the:-

1. Assistant Registrar (Establishment) University of Swabi.
2. Officer concerned.

BY: DIRECTOR (ESTABLISHMENT)

[Handwritten initials/signature]

SO (U-11)
557
4-3-15

[Handwritten notes: SO (U-11) m/a, D-91, 163, 26/1/15]

[Handwritten notes: 3/3/2015]

[Handwritten notes: M P.O. Mma, 09/03/2015]



UNIVERSITY OF SWABI

Khyber Pakhtunkhwa, Pakistan

F. No. 1(5)-Reg-1/UOS/2014/3269

Dec 10, 2014

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17

To

The Deputy Director (Colleges)
Higher Education Directorate, Peshawar

Subject:

APPOINTMENT OF MR. SHER ALAM KHAN, AP (ENGLISH) HED
AS REGISTRAR, ABUL WALI KHAN UNIVERSITY, MARDAN ON
REGULAR BASIS

Memo:

Kindly refer to your office 29144/CA/Est.Branch/A-12/Sher Alam
Khan/English dated 01-12-2014. In this regard it is stated that the officer
concerned has tendered his resignation w.e.f October 10, 2014 (A.N) as sent
to your office vide endorsement No. 1(5)-Reg-1/UOS/2014/3064, dated Oct
10, 2014.

It is requested that resignation may be considered effective from the
date i.e 10th October, 2014 (A.N).

Assistant Registrar
(Establishment)

CC:

1. Director (Colleges), Higher Education Directorate, Peshawar
2. Mr. Sher Alam Khan
3. Personal File

CAI
RECEIVED ON
 ★ 12 DEC 2014 ★
 Diary # 494e Page # 443
 UIClerk

Assistant Registrar
(Establishment)



12/ 18
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GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

SUMMARY FOR CHIEF MINISTER,
KHYBER PAKHTUNKHWA

SUBJECT: - RESIGNATION FROM SERVICE.


1. Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan has submitted resignation from Govt. service in this Department w.e.f. 10.10.2014 (F / A).

2. The above named officer applied through proper channel for the post of Registrar at Abdul Wali Khan University Mardan (F / B). He has been selected as Registrar (F / C). To join his new assignment, he has submitted resignation from the post of Assistant Professor in this Department.

3. Principal, GDC No. 2 Mardan has certified that the officer concerned is neither involved in any disciplinary case nor any inquiry is pending against him (F/D).

4. Higher Education Department proposes that the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan may be accepted w.e.f 10.10.2014. - P 122

5. Proposal in Para 4 above is submitted for approval of the Chief Minister, Khyber Pakhtunkhwa.


SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT 9/2015

MINISTER OF HIGHER EDUCATION.

CHIEF SECRETARY,
KHYBER PAKHTUNKHWA.

CHIEF MINISTER,
KHYBER PAKHTUNKHWA.



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

**SUMMARY FOR CHIEF MINISTER,
KHYBER PAKHTUNKHWA**

SUBJECT: - RESIGNATION FROM SERVICE.

Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan has submitted resignation from Govt. service in this Department w.e.f. 10.10.2014 (F / A).

2. The above named officer applied through proper channel for the post of Registrar at Abdul Wali Khan University Mardan (F / B). He has been selected as Registrar (F / C). To join his new assignment, he has submitted resignation from the post of Assistant Professor in this Department.

3. Principal, GDC No. 2 Mardan has certified that the officer concerned is neither involved in any disciplinary case nor any inquiry is pending against him (F/D).

4. Higher Education Department proposes that the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BS-18), Govt. Degree College, No. 2 Mardan may be accepted w.e.f 10.10.2014.

5. Proposal in Para 4 above is submitted for approval of the Chief Minister, Khyber Pakhtunkhwa.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

MINISTER OF HIGHER EDUCATION.

**CHIEF SECRETARY,
KHYBER PAKHTUNKHWA.**

**CHIEF MINISTER,
KHYBER PAKHTUNKHWA.**

9/2015
Proposed approved
MUSHTAQ AHMAD GHANI
Minister For Higher Education & Information
Khyber Pakhtunkhwa

P.T.O.



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

No. SO (C-II)HED/13-9/2010/Sher Alam.
Dated Peshawar the 17.06:2015.

To

Mr. Sher Alam Khan,
Registrar University of Swabi,
Swabi.

SUBJECT: - APPOINTMENT OF MR. SHER ALAM KHAN AP OF
ENGLISH HED AS REGISTRAR, ABDUL WALI KHAN
UNIVERSITY MARDAN ON REGULAR BASIS.

I am directed to refer to your letter No. F.NO1(1)-Reg-
2/UOS/2015/3907 dated 27.05.2015 on the above noted subject and to
state that your request for relieving instead of resignation cannot be
entertained in light of Establishment Department's Notification No.
SOR.VI(E&AD) 1-11/2003 dated 29.07.2006 (copy enclosed).

(RUKHSANA JABEEN)
SECTION OFFICER (COLLEGES-II)

Endst: No. & Date Even.

A copy of the above is forwarded for information to
Directorate of Higher Education Department.

Rukhsana Jabeen
SECTION OFFICER (COLLEGES-II)



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

No. SO (C-II)HED/13-9/2012/Sher Alam.
Dated Peshawar the 01.12.2015.

To

The Registrar,
Abdul Wali Khan University Mardan.

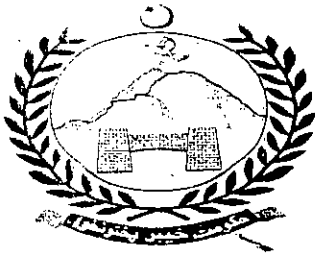
SUBJECT: **APPEAL AGAINST RESIGNATION, NOTIFICATION NO.
SO(COLLEGES-II)/HED 13-9/2010.**

I am directed to refer to your letter No. Nil dated 06-10-2015 on the subject noted above and to state that the Competent Authority has regretted your appeal regarding the withdrawal of the resignation tendered by you in light of Establishment Department circular letter No. S&GAD No. SO XII/2-96/59 dated 24.12.59 wherein it has been clearly mentioned that:

"When a resignation tendered by a Govt. Servant has been accepted and the acceptance has been communicated to him, it becomes final. There is no question of allowing him to withdraw the resignation." (Copy of the letter enclosed)

Rukhsana Jabeen
(RUKHSANA JABEEN)
o/c SECTION OFFICER (COLLEGES-II)

Rukhsana Jabeen



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

Dated Peshawar the June 08th, 2015.
2354-57

NOTIFICATION

NO. SO(COLLEGES-II)HED/13-9/2010: The Competent Authority is pleased to accept the resignation tendered by Mr. Sher Alam, Assistant Professor of English (BPS-18), Govt. Degree College, No. 2 Mardan w.e.f 10.10.2014 (A.N).

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even.

A copy of the above is forwarded to the:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Principal, Govt. Degree College, No. 2 Mardan.
3. District Account Officer Mardan.
4. Officer concerned.

Rukhsana Jabeen
(Rukhsana Jabeen)
SECTION OFFICER (COLLEGES-II)

9/6/15

To ✓
The Secretary to Government of Khyber Pakhtunkhwa,
Higher Education Department, Peshawar.

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Subject: Appeal against resignation Notification No: SO(COLLEGES-II) HED/13-9/2010
Dated: June 8th, 2015, received on 30th June, 2015

Sir,

I have the honour to state that I was appointed as Registrar, Abdul Wali Khan University Mardan on regular basis. The Higher Education Department notified my resignation Vide No: SO(COLLEGES-II) HED/13-9/2010 Dated: June 8th, 2015 received on 30th June, 2015. In this regard I beg to say the following points:

I have completed 22 year 7 months service and am qualified for premature retirement as per Government rules. I requested my parent department to consider my case on deputation or I may be allowed lien in the case.

As now I have received resignation notification, I requested the Vice Chancellor /Chairperson Syndicate, AWKUM to place my case before the Syndicate for protection of my pension and other benefits as admissible under the Statutes of the University. The case will be discussed in the Syndicate on 9th July, 2015.

It is, therefore, requested that implementation in the case may not be initiated and I may not be relieved off the Parent Department till the decision of the Syndicate. In case of non-confirmation of pension protection, the Competent Authority may be approached kindly to withdraw my resignation after its acceptance on merit basis as admissible under the rules Vide Estt. Division. O.M. No.8/1369-F.I, dated 30-1-1970 read with Estt. Division O.M.No.6/9/79-D.I, dated 19-6-1979 which state:

"Withdrawal of resignation after its acceptance but before it become effective i.e. before the government servant concerned is relieved. It should be open to the Authority accepting the resignation to allow the government servant concerned to withdraw the resignation on merit of the case"

It is, therefore, requested that my appeal may be considered/processed for withdrawal of the resignation, after its acceptance, in case of non-confirmation of pension protection by the Syndicate please.

Submitted for favourable consideration, please,

With many regards,



Sher Alam Khan
A/P English, HED
Registrar, AWKUM.

Copy to:

- Director Higher Education Colleges, Khyber Pakhtunkhwa.
- Principal Government Degree College No .2 Mardan.
- District Accounts Officer Mardan.
- PS to Chief Secretary Khyber Pakhtunkhwa
- PS to Vice Chancellor, AWKUM
- Deputy Secretary Colleges, HED
- Section Officer (Colleges-II)
- Personal File

To.

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

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Reminder

Subject: Appeal Against Resignation, Notification No. SO(Colleges-II)/HED/13-9/2010

Sir,

Reference may be made to the request submitted vide No. 1(1)Reg-2/UOS/2015/ 3907 dated May 27, 2015 and subsequent appeal against the subject resignation. In this regard, it is once again requested that the appeal may be considered/processed for further consideration of the authority for withdrawal of the resignation please. The matter being related with my career may be processed/considered on priority please.

Regards,

12/10/15
Sher Alam Khan

Assistant Professor of English,
Appointed as Registrar, AWKUM

Copy for information to:

1. Director Higher Education, Archives & Libraries Department Peshawar.
2. Principal, Govt. College No. 2 Mardan
3. District Accounts Officer Mardan
4. Deputy Secretary (Colleges), HED
5. Section Officer (College-II), HED
6. Personal File

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UNIVERSITY OF SWABI

Phone No. 0938-490236, Fax No. 0938-490238
www.uoswabi.edu.pk

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May 27, 2015

F. No 1(1)-Reg-2/UOS/2015/3907

Immediate

To

The Secretary,
Higher Education Department,
Khyber Pakhtunkhwa.

Subject: **APPOINTMENT OF MR. SHER ALAM KHAN, AP (ENGLISH) HED
AS REGISTRAR, ABDUL WALI KHAN UNIVERSITY, MARDAN ON
REGULAR BASIS**

Sir,

Reference may be made to this office letter Vide No: 1(5)-Reg-1/UOS/2014/3269 dated December 10, 2014 addressed to Deputy Director Colleges on the subject noted above. In this regard the officer's request for resignation from HED endorsed Vide No: 1(5)-Reg-1/UOS/2014/3064 dated October 10, 2014 may be considered and read as relieving from service in order to join his new assignment at AWKUM w.e.f October 10, 2014 afternoon.

This is important because the officer concerned applied through proper channels and NOC was issued from Director Colleges, HED in this regard.

Submitted for favour of relieving instead of resignation, please.

With Kindest Regards,

Registrar

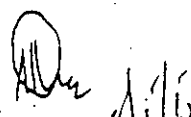
Copy to:

1. Director Higher Education Colleges.
2. PS to Minister Higher Education.
3. PS to Chief Secretary.
4. PA to Principal Secretary, Chief Minister's Secretariat.
5. PS to Vice Chancellor.
6. Deputy Secretary Colleges.
7. Section Officer Colleges (SO-I).
8. PA to Registrar, Abdul Wali Khan University, Mardan.
9. Personal File.


Registrar



i.e


28/5/15



**KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

No. 2545 /ST

Dated: 21/12 /2021

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

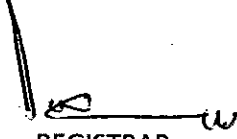
To

The Secretary Higher Education Archives and Libraries Department,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: JUDGMENT IN APPEAL NO. 87/2016, MR. SHER ALAM.

I am directed to forward herewith a certified copy of Judgement dated 12.11.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR