

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR

**Service Appeal No.1008/2024**

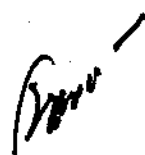
**Muzammil Khan**

**Versus**

**The Director (E&S) Education and others**

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**Zahoor Khan**  
DISTRICT EDUCATION OFFICER (M)  
LAKKI MARWAT.  
Respondent No. 2

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No.1008/2024

Muzammil Khan

Versus

The Director (E&S) Education and others

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15074

Dated 20/8/24

Written Reply on behalf of Respondent No-1&2

Respectfully Sheweth:

**Preliminary Objections:**

- A.** The appeal is wholly incompetent and untenable.
- B.** The appellant has not come to the Hon'ble tribunal with clean hands.
- C.** The appeal is filed by the appellant with mala-fide intent.
- D.** The appeal suffer from exaggeration and mis-statement.
- E.** The appellant has no locus standi and cause of action.
- F.** That the appellant is barred from preferring instant appeal, because he is guilty of concealment of actual facts.
- G.** That the appellant is misleading this Hon'ble Tribunal by stating that the appellant filed application for leave and waited but in fact, before submitting the application the appellant was out of the country on 28-08-2023, while alleged application was filed on 31-08-2023, after his departure from Pakistan. **(Copy of application and passport of appellant is Annexure-A & B)**
- H.** That the appellant left the country prior to submitting application, hence the appellant is not entitled to any relief as the appellant left the duty without informing the concern authorities. It is pertinent to mention that the respondents knew about appellant leaving country

on 28-08-2023 from the passport of appellant annexed with instant appeal.

- I. That the appellant's application was rejected by the competent authority and the appellant was informed through concerned, S.D.E.O, hence the appeal is liable to be dismissed.
- J. That the appellant was properly served with the notice dated:06-10-2023 for resuming duty and submit reasons for his absence and also publication was made to inform the appellant and later on after proper satisfaction the appellant was removed from service in accordance with law. This conduct of appellant disentitled him from re-instatement in service. **(Copy of Notice dated: 06-10-2023 and Publication are Annexure-C & D)**
- K. That in process of appellant's removal of service all the codal formalities were fulfilled and due to his willful absence the appellant was proceeded under Section 09 of E&D Rules 2011. Now the appellant is referring some of his fabricated applications to justify his absence from duty, while it is established on record that the appellant never personally appear before competent authority or on his duty before removal.
- L. The appellant has not come to the Hon'ble Tribunal with clean hands. The appeal also suffers from miss-statement and concealment of facts and as such the appellant is not entitled to any relief.

### **REPLY ON FACTS:**

1. That Para No.1. It is submitted that the appellant is guilty of leaving the duty without prior approval, even filing application for approval.
2. That Para No. 2 in concerned with the appellant, hence need no reply from respondents.

3. In reply to para-3 it is submitted that the appellant left the duty without informing the concerned authority.
4. In reply to Para-4 it is submitted that the appellant is misstating before the Hon'ble Tribunal because the appellant was outside of Pakistan, when the alleged application for study leave was presented on 31-08-2023. The appellant left the country even prior from applying for leave. The application of appellant was rejected and he was directed to join duty through concerned S.D.E.O.
5. In reply to Para-5 it is submitted that the appellant is again misstating before the Hon'ble Tribunal, the appellant never waited for outcome of the application because the appellant left the country on 28-08-2023 while the application was submitted on 31-08-2023. Moreover the application was rejected by the competent authority and the appellant was informed through concerned official.
6. That Para No. 6 is incorrect. The competent authority already completed the proceedings against the appellant and the appellant was removed from service vide order 30-11-2023. The appellant was in knowledge of the said proceedings as the father of the appellant filed appeal on 12-01-2024 before respondent NO.1, which was received on 17-01-2024. The appellant is denying the information about his removal just to cover the limitation. (Copy of appeal filed by the father of appellant is Annexure-E)
7. That Para No.7 is incorrect. The appellant was well aware about his removal from service. The appellant is misstating the facts to cover the limitation.
8. In reply to Para-8 it is submitted that the appellant filed departmental appeal through his father in January 2024 and cannot filed second appeal, neither the second departmental appeal could give fresh time of limitation. Moreover the appellant was in china till

05-07-2024, than who signed the alleged departmental appeal. The appellant is again lying for leniency of this Hon'ble Tribunal.

9. That Para No.9. It is submitted that the Nayab Ali Khan properly applied for leave and the case of Nayab Ali Khan is different from the appellant. The appellant could not take benefit from the other's case.
10. That Para No.10. The appellant's removal from service order is in accordance with law. The instant appeal is illegal and filed to pressurize department, therefore is liable to be dismissed.

### **REPLY ON GROUNDS:**

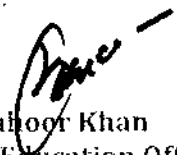
- a) That Para A is incorrect. The appellant was treated in accordance with law. The appellant himself violated the law, rules and policy by leaving the duty without prior permission, even before applying for approval for leave, hence he is not entitled to any relief.
- b) Incorrect. It is submitted that for study leave there is proper procedure and the civil servant must obtain approval prior to leaving duty but he appellant left the country prior from applying for approval, hence he is not entitled to any relief.
- c) Incorrect. It is submitted that the competent authority acted in accordance with law and policy while refusing the leave of appellant. Neither any assurance from any official was given to appellant nor can any other official give assurance to appellant. The order of removal of appellant from service in accordance with law and policy.
- d) That Para No.D is totally incorrect. The appellant case is different from others as the appellant left the country prior for applying for leave and no proper procedure was adopted by the appellant for applying study leave. The competent authority has rightly refused

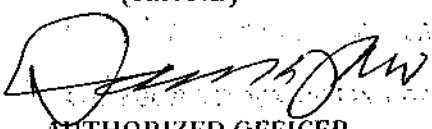
the leave and after adopting proper procedure the appellant was removed from service.

- e) That Para No. E is incorrect. The refusal of leave application was communicated to the appellant through concerned A.S.D.E.O. The appellant was outside the Pakistan, hence could not claim non-communication of said refusal order.
- f) That Para No.F is incorrect. The appellant never applied for support of department while applying for Higher Studies and when he left the country thereafter informed the department via application dated: 31-08-2023. Leaving the duty as well as country before applying for leave is willful absence, hence the appellant is rightly dismissed from service.
- g) That Para No.G is incorrect. The appellant was treated as per rules, policy and fairly and after complete satisfaction in respect of his absence from duty and conduct he was removed from service in accordance with rules and policy.
- h) That Para H is incorrect. Right of personal hearing was given to appellant vide notice dated: 06-10-2023, which was served on appellant's residence through registry. The appellant well aware of the notices and publication as the appellant's father filed departmental appeal on 12-01-2024. The competent authority was not bound to serve any notice when the appellant was outside the country without permission and as law the service on permanent residence is enough.
- i) In reply to this para it is submitted that how could appellant claim right of personal hearing when the appellant was outside the country without prior approval. The precedents referred by the appellant are not applicable in instant case.
- j) That the counsel of the respondents may please be allowed to raise further points at the time of arguments.

It is, therefore, most respectfully prayed that the appeal of the appellant may kindly be dismissed with special compensatory costs coupled with expenses of litigation.

SAMINA ALTAF  
DIRECTOR  
(R.No.1)

  
Zahoor Khan  
District Education Officer(M)  
Lakki Marwat (R.No.02)

  
AUTHORIZED OFFICER  
ABDUS SAMAD  
DEPUTY DIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.

SAMINA ALTAF  
DIRECTOR  
(R.No.1)

Zahoor Khan  
District Education Officer(M)  
Lakki Marwat (R.No.02)

ABDUS SAMAD  
DEPUTY DIRECTOR  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar.



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**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M) LAKKI MARWAT**

Phone & Fax: (0969)538291, Email: [emislakki@yahoo.com](mailto:emislakki@yahoo.com)  
[www.facebook.com/deomalelakki](http://www.facebook.com/deomalelakki), [www.twitter.com/dco\\_m\\_lakki](http://www.twitter.com/dco_m_lakki)

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**Service Tribunal Appeal No. 1008 of 2024**

**Muzammil Khan**

**Versus**


**Director Elementary & Secondary Education, KP and DEO  
Male Lakki Marwat**

**AFFIDAVIT**

I, Zahoor Khan, District Education Officer Male Lakki Marwat, do hereby solemnly affirm and declare upon oath that the contents of the accompanied written reply are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this Hon'ble Tribunal.

It is further added on oath that in this appeal the answering respondent have neither been placed ex-parte nor their defense have been struck off and no penalty has been imposed.

**Deponent**

  
**Zahoor Khan  
District Education Officer (M)  
Lakki Marwat**



20/08/2024

20 AUG 2024



سب ڈائریکٹریٹس ایجوکیشن  
معاون سسٹمی لبر  
جناب عالی!

حودیدہ گزارش ہے کہ سٹیٹ اعلیٰ تعلیم لیکچرانہ  
جائے ہیں جس لیکچرانہ کو سسٹمی لبر کی ضرورت  
ہے۔ جناب عالی سٹیٹ کو چوٹ چنٹ ایجوکیشن میں  
ایڈیشن مل گیا ہے جس لیکچرانہ کو صرف  
31-07-2026 کو راولپنڈی لکڑھی ہے۔ 2 سال 10 مہینے 30 دن  
لیکچرانہ صحت سے پیمردانہ ایسٹڈ لیکچرانہ ہے کہ سٹیٹ کو  
مستورہ سسٹمی لبر عطا فرمادیں!

عین لائسنس - مدرسہ  
31-08-2023  
السار صی =  
پستل ڈیپارٹمنٹ  
پستل ڈیپارٹمنٹ  
مکان گورنمنٹ پریپرڈ سررا لائسنس  
سررا لائسنس  
Mob. 0313-9792661

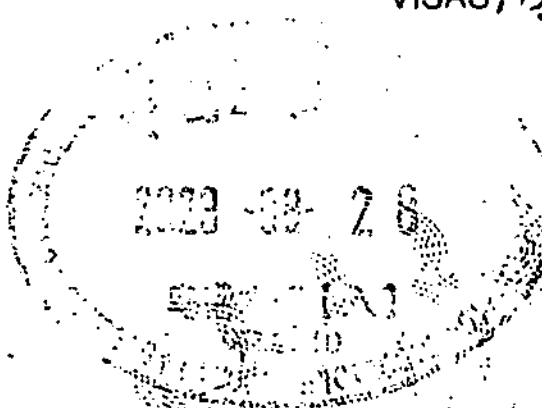
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Plp  
Assistant Director (I)  
SS Education Dept. KDU



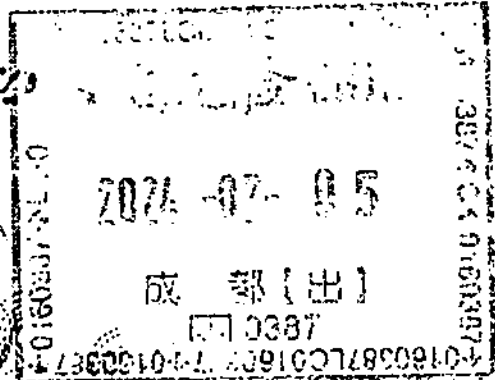


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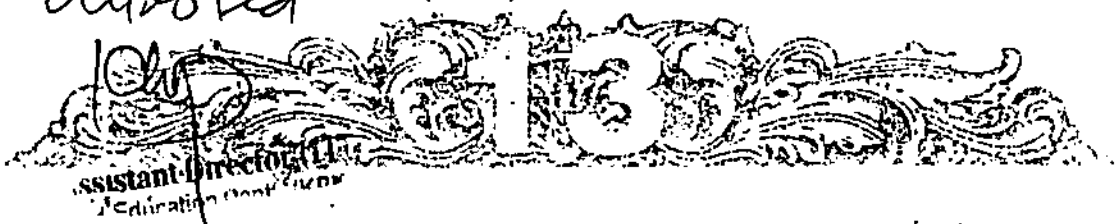
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VISAS/129



Attested



## رجسٹری

## محکمہ ابتدائی و ثانوی تعلیم (مردانہ) ضلع لکی مروت

مورخہ: 2023/05

مراسلہ نمبر: 7831

منجانب: ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) لکی مروت

بجانب: منزل خان PST گورنمنٹ پرائمری سکول نمبر 1 سرائے نورنگ کونکہ پریڈ ڈاکخانہ تحصیل سرائے نورنگ ضلع

عنوان:- غیر حاضری نوٹس

بحوال سب ڈویژنل ایجوکیشن آفیسر (مردانہ) سرائے نورنگ لیٹر نمبر 879 مورخہ: 27-09-2023 کے مطابق

آپ مورخہ 01-09-2023 تا حال سکول ڈیوٹی سے غیر حاضر ہے۔

آپ کو ہدایت کی جاتی ہے کہ مذکورہ غیر حاضری نوٹس موصول ہونے کے 15 یوم کے اندر اندر اپنی ڈیوٹی پر حاضر ہو کر  
زیر دستخطی کے روبرو اپنی غیر حاضری کی معقول وجہ بیان کریں بصورت دیگر آپ کے خلاف تادیبی کارروائی کی جائے گی جسکی تمام تر ذمہ داری  
آپ پر عائد ہوگی۔

ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ)

لکی مروت

نقول برائے اطلاع:

1- سب ڈویژنل ایجوکیشن آفیسر (مردانہ) سرائے نورنگ

ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ)

لکی مروت

attested

Plp

Assistant Director (IT)  
R.S. Education Deptt. KPK

No. 248	RGL117387821	ps.
For Insurance Stamps affixed except in enclosed insured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.		
Received a registered addressed to	Date	Stamp
"Write here 'letter', 'postage', 'packet' or 'parcel' with the word 'insured' before it when necessary.		
Insured for Rs. (in figures)	(in words)	
Insurance fee Rs. Ps. (in words)	Weight Grams	
Name and address of sender		

09/11/2023

**CORRIGENDUM**  
 The advertisement published in Daily Mashreq No. 877 on 25/10/2023 dated 25/10/2023. The following amendments have been made:  
 Sealed bids will be accepted till 10 am on 18/11/2023 in this office and will be opened at 11 am on the same date instead of 2 pm on 17/11/2023. The terms and condition will remain the same.

### Expression of Interest (EOI)

**Subject: High End Technology Services for Peshawar High Court**  
 Peshawar High Court is looking for an organization that is keeping pace with the ever-evolving IT landscape, we recognize the importance of investing in continuous learning and development.

- 1. Our primary objective in seeking IT Training Services is to:
  - Stay updated with the latest technologies and industry best practices, enhance the skills and competencies of our IT team.
  - Improve our organization's overall IT capabilities & effectiveness and address the specific IT challenges or opportunities relevant to our organization.

#### 2. In this context our organization is interested in the following IT Training Services:

- i. Technologies & tools: Net Core, NodeJs React, Open Source DB
- ii. Level of training: Intermediate to advanced
- iii. We expect that the IT training will result in:
  - Improved IT skills and expertise in our IT team.
  - Enhanced efficiency and effectiveness in IT-related tasks.
  - The ability to meet the IT demands of our organization more effectively.

#### 4. Terms & Conditions:

- Interested training providers are invited to submit their proposals in response to this EOI.
- Please include the following detail:
  - i. A brief company profile, highlighting your experience in providing IT Training Services;
  - ii. Details of the specific training programs you offered previously;
  - iii. Brief C.V of Trainers and their Qualification;
  - iv. Training delivery methods preferably "On Site";
  - v. Duration and Schedule of the training is 6 Weeks preferably.
  - vi. Fee Structure for the IT Training;
  - vii. There should be a Demo Class before the Final Selection;
  - viii. Sealed envelope marked as "Expression of Interest - For IT Training Services" alongwith requisite documents shall reach to the office of Director (LT), Peshawar High Court, not later than 11:00 am, 05/12/2023. EOI will be opened on the same day at 11:30 am. EOIs received after due date/time will not be considered. Peshawar High Court will not be responsible for postal delay.

Please Note: UNDP has consented to bear the Training expenses.

Registrar  
 Peshawar High Court

Daily Mashreq

Daily Mashreq 09-11-2023

ادھر سے کوئی بھی ایجنسی یا ادارہ (CO BPS-16) کو مطلع کیا جائے گا کہ اس کی درخواستیں 18/11/2023 سے سنبھالی جانیں گی۔ اس سے پہلے کی درخواستیں منظور نہیں کی جائیں گی۔

اس کے علاوہ اس کی درخواستیں 18/11/2023 سے سنبھالی جائیں گی۔ اس سے پہلے کی درخواستیں منظور نہیں کی جائیں گی۔

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No. 7233 dated 09-10-2023	02-09-2022	ادھر سے کوئی بھی ایجنسی یا ادارہ (CO BPS-16) کو مطلع کیا جائے گا کہ اس کی درخواستیں 18/11/2023 سے سنبھالی جائیں گی۔ اس سے پہلے کی درخواستیں منظور نہیں کی جائیں گی۔	1
Abstract Notice	مطلع	ادھر سے کوئی بھی ایجنسی یا ادارہ (CO BPS-16) کو مطلع کیا جائے گا کہ اس کی درخواستیں 18/11/2023 سے سنبھالی جائیں گی۔ اس سے پہلے کی درخواستیں منظور نہیں کی جائیں گی۔	1

ادھر سے کوئی بھی ایجنسی یا ادارہ (CO BPS-16) کو مطلع کیا جائے گا کہ اس کی درخواستیں 18/11/2023 سے سنبھالی جائیں گی۔ اس سے پہلے کی درخواستیں منظور نہیں کی جائیں گی۔

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advertisement in 1  
 two leading newspa  
 having wide circulati  
 District Education Office  
 (Lakki Marwat)

attested  
 Assistant Director (IT)  
 RS Education Deptt. Gujranwala

بخدمت جناب ڈائریکٹر ایلیمینٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

عنوان: عاجزانہ اپیل۔

جناب عالی!

مکودبانہ گزارش ہے کہ میرا بیٹا مزمل خان آپ کے زیر سایہ سرائے نورنگ ضلع کی مروت میں PST ٹیچر ہے۔ انہوں نے مورخہ 31-08-2023 کو (Male) DEO صاحب کی مروت کے خدمت میں Study Leave کے لئے ایک درخواست سب ڈویژنل آفیسر کے تھرڈ چھٹی نمبر 835 مورخہ 31-08-2023 کو روانہ کیا تھا۔ جو کہ ہر لحاظ سے جامعہ اور مکمل تھا۔ درخواست کے ساتھ تمام مطلوبہ دستاویزات لف تھے۔

1- اور بیجنل درخواست

2- ADO Recommendation Letter to SDEO

3- سب ڈویژنل ایجوکیشن آفیسر لیٹر نمبر 835 مورخہ 31-08-2023

4- ایڈمیشن نوٹس

5- Visa Application

6- Complete Service Photo Copy and Original

DD-I

18-1-24

ADDE (M)

17/1/24

1913  
18/01/24 original

روز بیجنل سوسائٹ

یہ تمام اور بیجنل ڈکومنٹس میرے بیٹے نے (M) DEO صاحب کی مروت میں بذریعہ (M) DEO صاحب کی مروت آفس ڈائری نمبر 2274 مورخہ 01-09-2023 کو جمع کئے تھے۔ تقریباً ایک ماہ تک ہم لوگ (M) DEO صاحب کی مروت کے دفتر کے چکر کاٹتے رہے۔ اور دودفعہ ہم لوگ بلشائفہ (M) DEO صاحب کی مروت سے ملے۔ اور انکو (M) DEO صاحب بنوں آفس میں اس طرح کے Study Leave کے Sanction Order انکو دیکھا دیئے۔ اور دونوں دفعہ (M) DEO صاحب کی مروت نے ہمیں بلشائفہ کہہ دیا کہ ہو جائے گا۔

جناب عالی!

میرے بیٹے نے تمام قانونی تقاضے پورے کئے تھے۔ اور تمام چیزیں (M) DEO صاحب کی مروت کے آفس میں ڈائری ڈسپنچ پر دیئے تھے۔ (M) DEO صاحب کی مروت کی نال مٹول اور Time Waste Policy کی وجہ سے میرے بیٹے کی جانے کا ٹائم پورا ہو گیا۔ اور دریں اثناء وہ چلا گیا اور (M) DEO صاحب کی مروت نے انکے غیر موجودگی میں انتہائی غیر قانونی، غیر آئینی کام کیا ہیں۔ کیونکہ نہ کوئی Explanation، نہ کوئی شو کاز نوٹس، نہ کوئی چارج شیٹ اور نہ کوئی Termination کمیٹی قائم کی۔ اور Direct Termination سمجھ سے بلاتر ہے۔ (M) DEO صاحب کی مروت کا Termination Letter کسی دوسرے ٹیچر نے مجھے موبائل میں بتا دیا۔ جس میں (M) DEO صاحب کی مروت نے صرف ایک نوٹس کا ذکر کیا ہے۔ اور پھر اس کے بعد نیوز پیپر کو

attested  
PUPAssistant Director (IT)  
& Education Dept. Peshawar730  
19/1/24

وہاں ہے جبکہ میں حلفا کہہ سکتا ہوں کہ نہ مجھے کوئی نوٹس ملا ہے اور نہ اخبار کا تراشہ میں نے دیکھا ہے۔ کیونکہ اخبار آج کل کون دیکھتا ہے۔ یعنی آج تک ہمیں نہ کوئی نوٹس اور نہ کوئی اخباری بیان دیکھا اور نہ اور ہیجٹل Termination Order ملا ہے۔ نہ مجھے اور نہ میرے بیٹے کو۔ کیونکہ وہ بیچارہ تو اپنے MS Study میں مصروف ہے۔ اور نہ ہم اسکو اس ظالمانہ فیصلے سے آگاہ کرتے ہیں۔ کیونکہ یہ اُنکے تعلیمی کیریئر پر بہت بُرا اثر مرتب کر سکتی ہے۔

جناب عالی!

DEO (M) صاحب لگی مروت نے اپنے اختیارات کا نہایت ہی غلط استعمال کیا ہے۔ آپ صاحبان سے عاجزانہ اپیل ہے۔ کہ میرے بیٹے کے آنے تک یہ تمام کارروائی روک دی جائے۔ کیونکہ یہ سب کچھ خدا نخواستہ اُنکے زندگی اور مستقبل پر بہت بُرا اثر مرتب کر سکتی ہے۔ ایک طرف تو حکومت کہتی ہے کہ اعلیٰ تعلیم کے لئے بچوں کی حوصلہ افزائی کرنی چاہیے۔ اور دوسری طرف یہ ظلم سمجھ سے بالاتر ہے۔

لہذا آپ صاحبان سے ہمدردانہ اپیل ہے کہ میرے بیٹے کی برطرفی کے آرڈر منسوخ کر کے فوری طور پر بحالی عمل میں لائی جائے۔ اور میرے بیٹے کے آنے تک اُن کے خلاف کسی قسم کی کارروائی روک دی جائے۔ جب وہ آجائے تو وہ اپنی پوزیشن واضح کر دے گا۔

نوٹ: درخواست کے ساتھ تمام دستاویزات لف ہے۔

سائل تادم زیت دعا گور ہیگا۔

مورخہ: 12/01/2024

العارض

صلاح الدین Father of مزمل خان PST سرائے نورنگ ضلع لگی مروت

واٹسپ نمبر: 0313-9797441

کاپی برائے اطلاع و ضروری کارروائی:

- 1- ڈائریکٹر پرائمری ایجوکیشن اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور۔
- 2- سیکرٹری ایجوکیشن خیبر پختونخواہ پشاور۔
- 3- چیف سیکرٹری گورنمنٹ آف خیبر پختونخواہ پشاور۔
- 4- ہوم سیکرٹری گورنمنٹ آف خیبر پختونخواہ پشاور۔

attested  
lap

Assistant Director (I)  
S&S Education Peshawar



"16"



**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M) LAKKI MARWAT**

Phone & Fax: (0969)538291, Email: [emislakki@yahoo.com](mailto:emislakki@yahoo.com)  
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**AUTHORITY**

Mr. Chandullah Jan AD-77 legal representative, O/O the District Education Officer (Male) Lakki Marwat is hereby authorized to submit reply to Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in S.A 1008/2024 Titled as Muzammil Khan Versus Government of Khyber Pakhtunkhwa on behalf of the undersigned.

  
**Zahoor Khan  
District Education Officer (M)  
Lakki Marwat**



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR**

**NOTIFICATION**

I, Samina Altaf, Director Elementary & Secondary Education Department Khyber Peshawar do hereby authorize, Mr. Abdus Sammad, Deputy Director (Legal) Directorate of Elementary & Secondary Education to sign parawise comments, replies, implementation report, objection petitions, civil miscellaneous application etc on my behalf for onward submission before the courts of law/tribunals as the case may be, with immediate effect in the interest of public service.


**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst. No. 2633-43 /F.No. AD(Lit-II)/E&SED/Office Correspondence/Vol-II/2024  
Dated Peshawar the 26/07/2024.

Copy of the above is forwarded for information & action to the:

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department Khyber Pakhtunkhwa.
4. Learned Registrar High Court Peshawar (with one each spare copy for the Honorable Judges).
5. Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members).
6. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.
7. All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
9. PA to Additional Secretary (General) E&SE Khyber Pakhtunkhwa, Peshawar.
10. PA to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
11. Master File.

  
**SAMINA ALTAF**  
**DIRECTOR**  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

attested  
  
**Assistant Director (I)**  
E&S Education Deptt. KPK