


FORM OF ORDER SHEET

Court of _____

Appeal No. 1483/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/09/2024	<p>The appeal of Mr.Deedar Gul re-submitted today by Mr. Muhammad Hassaan Adil Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1483 /2024

DEEDAR GUL

VS

SECRETARY TO GOVERNMENT OF KP AND ANOTHER

INDEX

Sr. No	Description of Documents	Annexures	Pages
1.	Service appeal		01 - 06
2.	Affidavit		07
3.	Application for Temporary Injunction		08 - 09
4.	Appointment Order	"A"	10
5.	Application to respondent no. 02's department	"B"	11
6.	Letter no. SOG/HD/1-2/P&T/2022-23, dated 21 st February, 2023	"C"	12
7.	Application under RTI Act, 2013	"D"	13
8.	Letter no. SOG/HD/1-2/P&T/2022-23-C031053 dated 2 nd May, 2023	"E"	14
9.	Complaint to the Chief Information Commissioner, Khyber Pakhtunkhwa Information Commission	"F"	15
10.	Letter no. RTIC/AR/1-10444/23/17990/92 dated 14 th June, 2023	"G"	16
11.	Letter no. RTIC/AR/1-10444/23/19990/93 dated 05 th September, 2023	"H"	17

12.	Representation to the department	"I"	18
13.	Academic record	"J"	19 - 23
14.	Vakalatnama	--	--

Handwritten signature

APPELLANT

Through

Handwritten signature

BARRISTER
MUHAMMAD HASSAAN ADIL
Advocate High Court

Handwritten signature

BARRISTER
SYED ZALAND ALI SHAH
Advocate High Court

Dated: 04th Sept, 2024

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

Service Appeal No. 1483 /2024

DEEDAR GUL

Son of Anar Gul,
Resident of Mohalla Aslam Dheri,
Pajagi Road, Terai Payan,
Peshawar

....APPELLANT

Versus

1. SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA,

Health Department,
Civil Secretariate,
Peshawar.

2. DIRECTOR GENERAL (DG),

Health Service,
Warsak Road,
Peshawar.

....RESPONDENTS

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR ISSUANCE OF SENIORITY LIST TO THE APPELLANT SO THAT HIS SENIORITY COULD BE DETERMINED FOR THE PURPOSE OF PROMOTION, WHEREBY THE DEPARTMENTAL REPRESENTATION OF THE APPELLANT DATED 29-05-2024 HAS NOT BEEN RESPONDED BY THE RESPONDENTS.

Respectfully Sheweth,

1. That the appellant was appointed, by the respondent no. 03's office, on 16.11.1998 (Annexure - A) in a prescribed manner as Bearer (BPS-04) at the respondent no. 05's office. The appellant has rendered services for more than twenty-six years in one and the same scale.
2. That after completing his probation period, the appellant was confirmed and his services were regularized, which further encouraged him to perform his duty in accordance with law, at respondent no. 05's office.
3. That legally and by practice, after appointing a civil servant, the department issues a seniority list or places his / her name in the already maintained seniority list, which helps an employee in determining his / her seniority for the purpose of promotion, however, astonishingly, the respondents, particularly respondent no. 04 failed to issue seniority list of the appellant. The practice of non-issuance of seniority list continued for almost 24-25 years.
4. Resultantly, the appellant submitted an application to the respondent no. 02's department (Annexure - B), consequently which a letter no. SOG/HD/1-2/P&T/2022-23, dated 21st February, 2023 (Annexure - C) was forwarded to Director General Health Services,

Khyber Pakhtunkhwa by the Section Officer (General), stating therein to redress the grievance of the appellant at the earliest in accordance with the prevalent rules. Needless to mention here that respondent no. 03's department didn't even consider it necessary to answer the same.

5. Following the same, on 02nd May, 2023, the appellant was dragooned to put up an application (Annexure - D) to respondent no. 02's office under the RTI Act, 2013 for providing him information regarding his seniority list. Respectively, a letter no. SOG/HD/1-2/P&T/2022-23-C031053 dated 2nd May, 2023 (Annexure - E) was again forwarded to Director General Health Services, Khyber Pakhtunkhwa, Peshawar by the Section Officer (General), wherein it was again requested to provide the appellant with the requisite information within three days but to no avail.
6. That as the appellant's jeremiad was not responded by the respondents, therefore, on 29-05-2023, he knocked the door of the Chief Information Commissioner, Khyber Pakhtunkhwa Information Commission, in the form of complaint (Annexure - F) under the KP RTI Act, 2013 for providing him the necessary information regarding his seniority list, which was followed by a letter no. RTIC/AR/1-10444/23/17990/92 dated 14th June, 2023 (Annexure - G) from the Additional Registrar, KP Information Commission, Peshawar to the respondent's department. However, the atrocity of the respondent's department can be assessed from the fact even after the lapse of so many years they didn't deem it necessary to determine the seniority of the appellant.
7. On 5th of September, 2023, the Deputy Registrar, KP Information Commission, Peshawar was impelled to issue final notice to the respondent's department vide letter no. RTIC/AR/1-

10444/23/19990/93 dated 05th September, 2023 (Annexure - H), but the same also remained unanswered.

8. Needless to mention here that another representation dated 29-05-2024 (Annexure - I) was also submitted to the department by the appellant along but the respondent's department didn't consider it necessary to even take up the file of the appellant into consideration.
9. That the appellant, realizing the violation of his rights, approaches this Hon'ble Court through instant appeal, *inter alia*, on the following grounds amongst others;

G R O U N D S:

- A. That the appellant is equipped with all the requisite qualification (Annexure - J) which could help him in getting the promotion but the same remained uneffected just because of the respondents for the reason that till date neither any seniority of the appellant had been determined nor any list has been issued in that respect.
- B. That according to statute and the law laid down by the Superior Courts, seniority of an official / officer has to be reckoned from the date of his initial appointment, which would then help him in determining his seniority for the purpose of promotion, which although, is not his fundamental right but at the same time, the department or any authority, in any manner whatsoever, could not ignore.

- C. That if the seniority of the appellant had been determined after his appointment, he would have now been promoted but the organizational injustice done to the appellant would not only lower the interest of other employees but it would also result in efficiency, low morale, likelihood of misconduct and distrust of the public in the departments.
- D. That for an effective and efficient department, it is necessary to ensure the provision of organizational justice, especially in health sector as an institution, particularly with regard to career progression and promotion of the employees.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.
- F. That appellant reserve his right to urge additional grounds with leave of the Tribunal, after the stance of the respondents becomes known to him.

PRAYER:

It is, therefore, most respectfully prayed that on acceptance of the instant appeal, the Hon'ble Tribunal may graciously be pleased to direct the respondents to determine the seniority of the appellant by issuing the seniority list.

Any other remedy to which the appellant is found fit in law, justice and equity may also be granted.

6

Zalanda

APPELLANT

Through

Hassan

BARRISTER
MUHAMMAD HASSAAN ADIL
Advocate High Court

Zaland
Shah

BARRISTER
SYED ZALAND ALI SHAH
Advocate High Court

Dated: 04th Sept, 2024

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

Service Appeal No. _____/2024

DEEDAR GUL

VS

GOVERNMENT OF KP AND OTHERS

A F F I D A V I T

I, **Deedar Gul**, Son of Anar Gul, Resident of Executive Engineer Building, Division-II, Bacha Khan Chowk, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

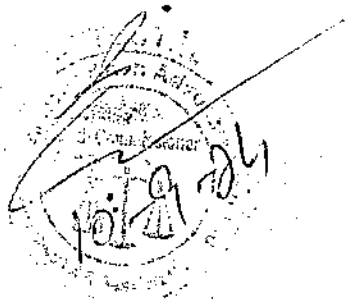
[Signature]
DEPONENT

IDENTIFIED BY:

[Signature]
BARRISTER

MUHAMMAD HASSAAN ADIL

Advocate High Court



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

Service Appeal No. _____/2024

DEEDAR GUL

VS

SECRETARY TO GOVERNMENT OF KP AND ANOTHER

**APPLICATION FOR RESTRAINING THE
RESPONDENTS FROM TAKING ANY ADVERSE ACTION
AGAINST THE APPELLANT TILL THE FINAL
DISPOSAL OF THE INSTANT APPEAL.**

Respectfully Sheweth:

- 1) That the above titled appeal is being filed before this hon'ble Tribunal along with instant application.
- 2) That the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 3) That appellant has a good prima-facie case in his favour and is also sanguine about its success.
- 4) That balance of convenience also leans in favour of appellant.
- 5) That if the relief as prayed for in the heading of this application is not granted, the very purpose of titled appeal will become infructuous.

PRAYER:

It is, therefore, prayed that on acceptance of this application, the respondents may graciously be restrained from taking any adverse action against the appellant till the final disposal of the instant appeal.

[Signature]
APPELLANT

Through

[Signature: Hassan]

BARRISTER
MUHAMMAD HASSAAN ADIL
Advocate High Court

[Signature: Syed Zaland Ali Shah]

BARRISTER
SYED ZALAND ALI SHAH
Advocate High Court

AFFIDAVIT

I, **Deedar Gul**, Son of Anar Gul, Resident of Mohalla Aslam Dheri, Pajagi Road, Terai Payan, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

[Signature]

DEPONENT

OFFICE OF THE ADMINISTRATOR
GOVT. L.R.H. PESHAWAR.

OFFICE ORDER:

No. Didar Gul S/O Anar Gul
is hereby appointed BARBER in BPS, 1 (Rs. 1245-35-1770)
the rules and allowances as admissible to him under
Dist. Hospital, Peshawar.

Appointment is purely on temporary basis and is
made at any time without assigning any reason.

Appointee is subject to production of Medical
Fitness Certificate.

He/She will be governed by all such rules and orders etc
relating to pay, leave and Medical Charges etc. as may be issued
by the Govt. from time to time for category of Govt. Servants to which
he belongs.

He/She will be liable to transfer to corresponding post
any where in the N.W.F.P.

He/She will be on probation for a period of one year.

If he/she wishes to resign from service, he/she will have
to give one month notice in advance and will continue to serve the
Govt. till the expiry of his/her resignation by the competent
Authority and he/she will be paid his/her last pay in full and
Month Pay in arrears.

If he/she accepts the offer on the terms and conditions
above he/she should report for duty to the undersigned within 10-days
of the issuance of this offer failing which the offer will be
considered as withdrawn.

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR.

Dated, Pesh: the 16/11/1998

No. 32712-15/1998

Copy forwarded to the:

1. Dy: Medical Officer (Admin): LHM, Peshawar.
2. Senior Accountant: do
3. Director General Health Services, N.W.F.P., Peshawar.
4. Mr. Didar Gul, S/O Anar Gul Vill: Teraya Payan Meh: Aslan
Teh: DISTRICT, PESHAWAR.

and necessary action.

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR.

Annexure
"B"

Dated: 21-Feb-2023

11

Secretary Health,
Khyber Pakhtunkhwa.

SUBJECT: REQUEST FOR PROMOTION

With a humble submission, it is stated that I have been working as Bearer (BPS-04) under the service of DG-HS since 17-Nov-1998 till date without any promotion.

I have been posted at Lady Reading Hospital-MTI Peshawar since my joining and working under same pay scale as civil servant with due honesty and dedication. I have applied for promotion twice but haven't received any progress.

Moreover, I have applied for inclusion in seniority list dated 30-May-2022 to DG Health Services via Diary No. 21662 (30/5/2022) but no correspondence was received on this either.

Sir, it is requested to your kind authority to look into my case and promote me as per policy. I shall be highly indebted to you for this favor.

Yours Sincerely

DEEDAR GUL, s/o ANAR GUL

NIC: 17301-1332886-9

Cell: 0321-9231088, 0314-9139142

Asst.

Snd. to DG

21/2/23

ATC

HEALTH DEPARTMENT

Annexure - "C" (12)

No. SOG/HD/1-2/P&T/2022-23

Dated Peshawar, the 21st February, 2023.

1470

22-02-2023

To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Subject: REQUEST FOR PROMOTION.

Dear Sir,


Reference to the subject noted above and to enclose herewith a copy of application in respect of Mr. Deedar Gul S/o Anar Gul, Bearer (BS-04), Directorate General Health Services, Khyber Pakhtunkhwa, presently posted at Lady Reading Hospital-MTI, Peshawar, wherein he complained about non-inclusion of name in the respective seniority list for promotion.

2. Needless to say, determination of seniority of the employees of various cadre or post is a mandatory requirement for proper administration as enshrined in Chapter-II, Section-8 of the "Khyber Pakhtunkhwa Civil Servants Act, 1973" (NWFP Act No. XVIII of 1973). On the contrary, seniority of the official under reference has not been maintained as reported by him in the enclosed application, which is not only defiance of the rules ibid but also a grave procedural lapse which might entail undesired litigation for the Department.

3. It is therefore, requested to kindly look into the matter for redressal of the grievances of the applicant/complainant at the earliest in accordance with the prevalent rules under intimation to this Department, please.

Encl: A.A.

Yours faithfully,


SECTION OFFICER (GENERAL)
(091-9210863)

Copy for information to the:-

1. PS to Secretary Health Department Khyber Pakhtunkhwa, Peshawar.
2. PS to Special Secretary (E&A) Health Department Khyber Pakhtunkhwa, Peshawar.
3. PA to Additional Secretary (E&A) Health Department Khyber Pakhtunkhwa, Peshawar.
4. Mr. Deedar Gul S/o Anar Gul, Bearer (BS-04), LRF-MTI, Peshawar (w/r to above).


SECTION OFFICER (GENERAL)



AT (13)

11

SECRETARY, Khyber Forest Division

13/3/21

13/3/21

13/3/21

13/3/21

13/3/21

13/3/21

13/3/21

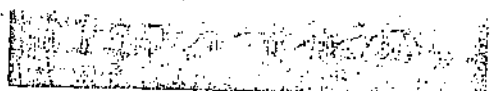
13/3/21

13/3/21

13

Annexure

D 053



13/3/21



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

14

Annexure - 'E'

No. SOG/HD/1-2/P&T/2022-23
Dated Peshawar, the 2nd May, 2023.

To

003/0543

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Subject: REQUEST FOR PROVISION OF DOCUMENT UNDER RTI ACT, 2013.
Dear Sir,

I am directed to refer to this Department's letter of even number dated 21st February, 2023 on the subject noted above and to enclose herewith a copy of Public Information Officer, PFI Form No. 053 dated Nil alongwith copy of application submitted by Mr. Deedar Gul S/o Anar Gul, Bearer (BS-04), Directorate General Health Services, Khyber Pakhtunkhwa, presently posted at Lady Reading Hospital-MTI, Peshawar, wherein he has requested for provision of the requisite information/documents.

2. In view of the above, it is therefore, requested that the requisite information/documents may kindly be provided to the applicant within three days positively under RTI Act, 2013 as well as intimation to this Department, please.

3. The matter may be accorded TOP PRIORITY.

Encl: A.A.

Yours faithfully,

SECTION OFFICER (GENERAL)
(091-9210363)

Copy for information to the:-

1. Public Information Officer, RTI Khyber Pakhtunkhwa, Peshawar w/r to above.
2. PS to Secretary Health Department Khyber Pakhtunkhwa, Peshawar.
3. PS to Special Secretary (E&A) Health Department Khyber Pakhtunkhwa, Peshawar.
4. PA to Additional Secretary (E&A) Health Department Khyber Pakhtunkhwa, Peshawar.
5. Mr. Deedar Gul S/o Anar Gul, Bearer (BS-04), LRU-MTI, Peshawar, w/r to above.

SECTION OFFICER (GENERAL)

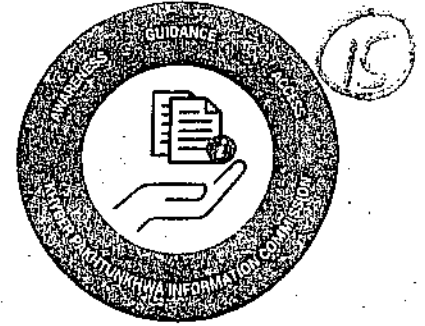
3483
3/5/23

AT (S)

COMPLAINT

AGAINST NON-PROVISION
OF INFORMATION UNDER
THE KP RTI ACT 2013

Annexure
"F"



To

The Chief Information Commissioner,
Khyber Pakhtunkhwa Information Commission,
Peshawar

Application No: 1096

Dear Sir / Madam,

It is to state that I submitted an information request to the Public Information Officer (PIO) of Health
dept KPIC (Department Name) on 02-08-2013 (copies attached).
Civil servant

I waited for the period as stipulated in the "Khyber Pakhtunkhwa Right to Information Act 2013" for the provision of information. However, the requested information was not provided/partially provided to me till date by the public body. Therefore, I hereby lodge complaint with the Khyber Pakhtunkhwa Information Commission against the department for non-provision of information under the KP RTI ACT 2013 to provide the requested information. Further details:

My request submitted to Sanitary Health is
attached kindly please my complaint
and provide the respective information.

Attachments checklist

- Copy of NIC
- Copy of information request
- Copy of acknowledgement receipt or courier receipt

Yours sincerely,

Name: Deedar Gul

Signature: [Signature]

NIC: 17301-1332826-9

Mobile Number: 033-9231180

Address: C/o Forest Sultan (malik) Khyber forest Division Shami Rd Pesh.

Email Address: _____

Date: 28-08-2013

Acknowledgement Receipt

Application No: 1096

This is to acknowledge that a Complaint was received from _____
on _____ against _____

For more details and to check the status of _____

[Handwritten Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
INFORMATION COMMISSION
Near BRT Abdara Station, Arbab Colony, Opposite Jabar
Flats, University Road, Peshawar.
Email: complaints.kprti@kp.gov.pk
Phone: 091-9216557
Fax: 091-9216561

16

Annexure "G"

No: RTIC/AR/1-10444/23

Dated: 4 JUN 2023

17980
92

To

The Deputy Secretary (Admn) / PIO,
Health Department,
Peshawar.

Subject: COMPLAINT AGAINST NON-SUPPLY OF INFORMATION
(COMPLAINT NO: 10444)

I am directed to state that a citizen Mr. Deedar Gul has filed an information request with your department for seeking some information, however the same was not provided to him within prescribed time limit, therefore, he has filed a complaint before the KP Information Commission. (copy attached)

It is to direct to respond parawisely to the complainant within ten working days of the receipt of this letter under intimation to the KP Information Commission.

Assistant Registrar,
KP Information Commission,
Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, KP Information Commission, Peshawar.
2. Mr. Deedar Gul (Complainant).

Assistant Registrar,
KP Information Commission,
Peshawar.

ATC/10/23



GOVERNMENT OF KHYBER PAKHTUNKHWA
INFORMATION COMMISSION
Near BRT Abdara Station, Arbab Colony, Opposite Jabar
Flats, University Road, Peshawar.
Email: complaints.kprti@kp.gov.pk
Phone: 091-9216557
Fax: 091-9216561

17

Annexure - H

No: RTIC/AR/1-10444/2023

Dated:

05 SEP 2023

179990
93

FINAL NOTICE

To

The Deputy Secretary Admin/PIO,
Health Department,
Peshawar.

Subject:

FINAL NOTICE FOR NON SUPPLY OF INFORMATION TO MR.
DEEDAR GUL, (COMPLAINT NO: 10444)

I am directed to refer to the subject noted above and to state that Mr. Deedar Gul has filed a Complaint (No.10444) for non-supply of information requested under RTI Act 2013. In this regard, the Commission issued necessary directions to you vide letter No. RTIC/AR/1-10444/2023/17990-92 dated: 14th June 2023, but no response received.

The Commission has taken serious notice on the infringement of time lines set out in Section 11 read with Section 23 of the KP RTI Act, 2013, and non-compliance of lawful directions of the Commission passed under Section 25 read with Section 26 of the Act *ibid*. By defying the provision of RTI Act 2013, the delinquent Officer (s) rendered themselves liable to be proceeded against under Section 26 read with Section 28 of the Act *ibid*. However, the Commission taking lenient view, has decided that before invoking punitive provisions, a final opportunity be given to the public body to respond parawisely to the complainant within ten working days positively.

Deputy Registrar,
KP Information Commission,
Peshawar.

Copy to:-

1. PS to Chief Information Commissioner, KP Information Commission, Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa, Health Department Peshawar
3. Mr. Deedar Gul (Complainant)

Deputy Registrar,
KP Information Commission,
Peshawar

Annexure - "I"

18

To,

DIRECTOR GENERAL HEALTH SERVICES

Health Department
Peshawar, Khyber Pakhtunkhwa

Subject: REQUEST FOR SENIORITY LIST OF CLASS IV EMPLOYEES FOR PROMOTION

Respected Sir,

I hope this letter finds you in good health. The undersigned is serving as a Bearer (BPS-4) at Lady Reading Hospital, Peshawar, since November 17, 1998. The reason for writing this letter is to bring your kind attention to the fact that since my appointment till date, the seniority list of Class - IV employees has not been issued by the department, which is essential for understanding my position and eligibility for promotion. It would also be relevant to mention here that since my appointment, I have not been promoted despite the fact that I am fulfilling the requirements for the next higher grade, which is a sheer violation of my fundamental rights.

You are, therefore, most respectfully requested to provide the undersigned's seniority list as well as to consider me for promotion to the next higher grade in accordance with rules.


Thank you for your attention to this matter. I look forward to your positive response.

Yours sincerely,


DEEDAR GUL

Bearer (BPS-4)
Lady Reading Hospital
Peshawar

15664 / R
89/5/24


M. Q. S.

GGN 299841

**Board of Intermediate & Secondary Education
PESHAWAR**

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)

Session 1997 (Annual/Supplementary)

Name

Dida Gul

Father's Name

Anar Gul

Roll No

10638

S. No.	SUBJECT	Total number of marks allotted	MARKS OBTAINED	
			In figures	In words
1	English	150	70	
2	Urdu	150	65	
3	Islamiyat Comp	75	47	
4	Pakistan Studies	75	54	
5	Gen. Mathematics	100	63	
6	General Science	100	29	Four hundred
7	As	100	67	Sixty-four
8	A	100	67	
	Total	850	466	

This certificate is issued errors and omissions excepted

Prepared by

Checked by

Date

19

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

(Signature)

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE

Intermediate Examination / Humanities Group

SESSION 1989 (Annual/Supplementary)



Sr. No: 73923

Name: *Dilip Kumar*

Father's Name: *Mrs. S. K. Khan*

Roll No: 170272

Subjects	Subjects Marks	MARKS OBTAINED			
		Part I	Part II	Total in	
				Figures	Words
1. English	200	100	100	200	
2. Urdu	200	100	100	200	
3. Islamic Education	50	50		50	
4. Pakistan Studies	50	50		50	
5. <i>Maths</i>	200	100	100	200	
6. <i>Physics</i>	200	100	100	200	
7. <i>Chemistry</i>	200	100	100	200	
Total	1100	550	550	1100	

Note: Errors/Omissions excepted.

Date: 17/11/1989

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by

Checked By

AT @ TEL

(21)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

GOVT. HIGH SCHOOL NO. 2

Peshawar City

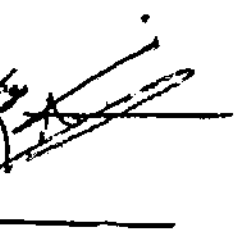
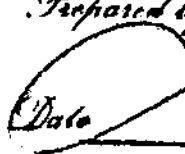
2 F R 12658

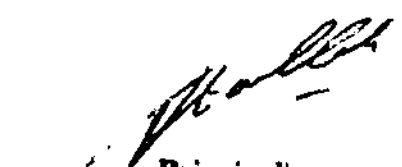
Charactor Certificate

AdNo. 16905

Certified that Mr. Didar Jal
To Mr. Amaz Jal remained a
regular student of this School up to 31-3-1991.

During his stay, over here he was of good moral Character.

Prepared by 
Date 


Principal
Govt. High School No. 2
Peshawar City.




S. No. 321239



Roll No. 170272

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



**Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION**

Humanities Group
SESSION 1996 (ANNUAL)

THIS IS TO CERTIFY THAT Didar Gul

Son/Daughter of Anar Gul

and a resident of Peshawar District.

Registered No. 114-B/HP TY- 91 has passed the *Intermediate Examination* of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1996

as a *Private candidate*. He/She obtained 438 Marks out of 1100

and has been placed in Grade E Representing Satisfactory

the Examination was taken as a whole/in parts.

ATTACHED


Asstt. Secretary


Secretary

This certificate is issued without alteration or erasure.

23

S. No. **PBR-0012564**

Roll No. 10638



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



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

SESSION 1991 (ANNUAL)
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Didar Gul

Son / Daughter of Anar Gul
and a student of Govt: High School, No.2 Peshawar City

has passed the *Secondary School Certificate Examination*
of the Board of Intermediate and Secondary Education, Peshawar held in March 1991
as a *Regular candidate*. He / She obtained 464 Marks out of 850
and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Pakistan Studies
- 5. Gen: Science
- 6. Gen: Mathematics
- 7. Isl. Studies
- 8. Arabic.

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

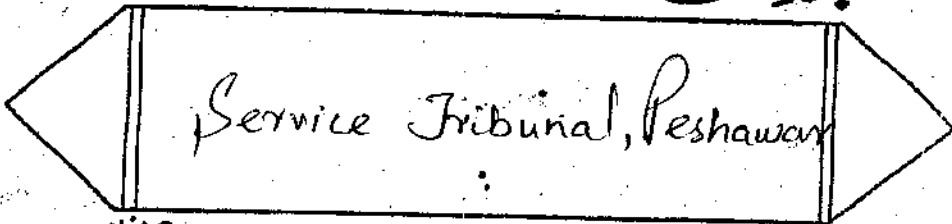
Date of birth according to admission form is Twenty First April
one thousand nine hundred and Seventy Five 21-4-1975

[Signature]
Asstt: Secretary
10th July 1991

[Signature]
Secretary

This certificate is issued without alteration or erasure.

بعدالت



7/10/2010
2 جناب کوٹلیٹ آف ایسی
بنام

BC # 24-7008

CNIC # 17361-4151097-9

Cell # 0303-8373453

مدرجہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کارروائی متعلقہ
آن مقام سید محمد حسین علی محمد کیلئے سید محمد حسین علی محمد کے ساتھ سید محمد حسین علی محمد کے ساتھ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار دگا۔ نیز
دیکل صاحب کو رضی نامہ کرنے و تقررات ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک رو پیسہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا جیل کی برادگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پروا خستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سند رہے۔

Attested & Accepted
Hameed

المرقوم 10-9-2010

Attested & Accepted
Suhail

کے لئے منظور ہے۔

بمقام سید

دیباغی وکالت سید محمد حسین علی محمد