

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL**

**Service Appeal No.1462/2022**

Salabat Khan..... Appellant

VERSUS

Govt.of Khyber Pakhtunkhwa  
Through Chief Secretary& others.....Respondents "

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Dated: 20/11/2024

  
Respondents

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHWAR**

SA# 1462/2022

Diary No. 18620  
Date 20/11/24

Salabat khan.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa  
Through Chief Secretary & others..... Respondents

**SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1-3.**

**Respectfully Sheweth: -**

**Preliminary Objections: -**

1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant is trying to conceal material facts.
4. That the Honourable Tribunal lacks jurisdiction to entertain the instant appeal.
5. That the appeal in hand is hit by doctrine of laches.
6. That the appellant is estopped by his own conduct to file the instant service appeal.
7. The instant appeal is not maintainable as the appellant did not file any departmental appeal.
8. That the instant service appeal is barred by time.

**Facts: -**

1. Pertains to record
2. Correct.
3. Pertains to record.
4. The appellant submitted the case to Director Education Fata.
5. Correct.
6. Pertains to record.
7. Pertains to record
8. Pertains to record.
9. Correct to the extent that the appellant submitted application to the principal (**Annex-A**).
10. That the Principal forwarded his case to the office of respondent No. 03 (Director, Higher Education) vide letter dated 17.09.2020 (**Annex-B**). Respondent No. 03 vide letter dated 20.10.2020 (**Annex-C**) asked the Principal to apprise as to whether the appellant has reported for duty or otherwise? And also to direct the appellant to apply for ex-post facto leave. Meanwhile, the Principal informed the office of respondent No. 03 on 29.05.2021(**Annex-D**) that the leave application of the appellant is under process at District Accounts Officer, Miran Shah, NWTD. The Principal vide letter dated 30.08.2021 (**Annex-E**) submitted the leave case of the appellant which was forwarded to the office of respondent No. 02 vide letter dated 15.09.2021(**Annex-F**). The office of respondent No. 02

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directed to initiate wilful absence proceedings under E&D, rules, 2011 against the appellant vide letter dated 15.10.2021 (**Annex-G**). Subsequently, an absence notice dated 26.10.2021 was sent on his home address through registered post on the home address but the appellant did not report for duty (**Annex-H**). An absence notice was published in two (02) leading newspapers on 07.01.2022 and 09.01.2022 (**Annex-I**) and upon non-reporting for duty, the appellant was removed from service under rule-09 of Khyber Pakhtunkhwa (Efficiency and Discipline) Rules, 2011 vide notification dated 17.05.2022 (**Annex-J**).

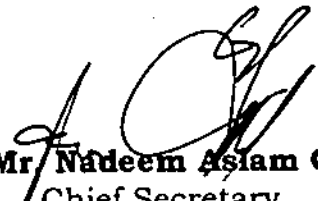
11. Incorrect. No such appeal is present in office record.
12. Pertains to record.

**Grounds: -**

- A. Incorrect. That the order is in accordance with law/rules.
- B. Incorrect. That the appellant has been treated as per law/rules.
- C. As already explain in preceding paras.
- D. As already explain in preceding paras
- E. As already explain in preceding paras
- F. Incorrect. As already explained in para 10 of the facts.
- G. Incorrect. As already explained in para 10 of the facts.
- H. Incorrect. As already explained in para 10 of the facts.
- I. Incorrect. The act of the respondents is according to law/rules.
- J. That the respondents may be allowed to raise other material grounds at the time of arguments.

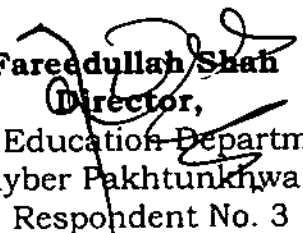
**Prayer: -**

It is, therefore, humbly prayed that the instant service appeal is based on misconception/ misstatement, hence may graciously be dismissed with cost.

  
**Mr. Nadeem Aslam Chaudhry**  
Chief Secretary,  
Govt. Khyber Pakhtunkhwa  
Respondent No. 1

  
**Capt. (Rtd.) Kamran Ahmad Afridi**

**Secretary,**  
Higher, Department  
Education  
Khyber Pakhtunkhwa  
Respondent No. 2

  
**Fareedullah Shah**  
Director,  
Higher Education Department,  
Khyber Pakhtunkhwa  
Respondent No. 3

h

# Annex-A

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To

The Prindpal

Govt: Degree College Mir Ali NWTD.

SUBJECT: ADJUSTMENT.

R/Sir,

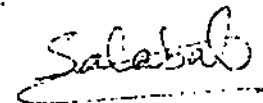
Reference Notification No. 2046 - 51 Dated: 03/11/2020

regarding sanction of 1413 days study leave ( w.e.f 01-09-2016 to 15-07-2020 ) on half average pay , it is stated that after completion of period I am bound to show my arrival report at the specific time , but unfortunatly because of the unavailability of flights from China to Pakistan due to covid-19 I could not show my arrival well in time.

Now in this connection your authority is meekly requested to please further

Proceed as per rule.

Dated : 15/07/2020.



Your's Sincerely  
Mr. Silabat Khan  
Lecturer in C. Science  
GDC Mir Ali NWTD

A  
Annex-B Annex-B 30

**OFFICE OF THE PRINCIPAL GOVT: DEGREE COLLEGE MIR ALI NWTD.**

No. 9568 Dated GDC Mir Ali The 17 / 09/2020.

To

The Director Of Higher Education  
Khyber Pakhtoon Khwa Peshawar.

SUBJECT: ADJUSTMENT.

Memo:

The original self explained application along with Beijing Institute of Technology letter No nil dated: July 07, 2020 in respect of Mr. Silabat Khan Lecturer in Computer Science is sent herewith to your authority for further necessary action please.

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D.D.E

*[Handwritten signature]*  
56.291 324

*[Handwritten signature]*  
Principal  
GOVT: DEGREE COLLEGE MIR ALI NWTD

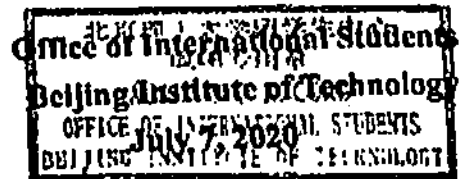
GD Mir Ali NWTD



北京理工大学  
BEIJING INSTITUTE OF TECHNOLOGY

**Subject: Delay and stay on humanitarian basis due to pandemic**

It is to certify that Mr. Salabat Khan, a doctoral candidate majoring in computer science and technology, School of Computer Science and Technology, Beijing Institute of Technology, passed the defense of his doctoral thesis on 2020/6/19, and was successfully awarded degree on 2020/7/7. Unfortunately, Mr. Salabat Khan's visa was extended on humanitarian basis till per flights availability caused by COVID-19 pandemic.



地址: 中国·北京海淀区中关村南大街5号  
5 South, Zhongguancun Street, Haidian District, Beijing China

<http://www.bit.edu.cn>

邮政编码: 100081  
Postcode: 100081



**DIRECTORATE OF HIGHER EDUCATION**

**KHYBER PAKHTUNKHWA**

**Rano Garhi, Peshawar**

Tel # 091-2650025 / 2650024

E-mail:- [dhekpkeshe@gmail.com](mailto:dhekpkeshe@gmail.com) Facebook.com/dhekpkeshe Peshawar Twitter.com/dhekpkeshe Peshawar

No. 18800 / CA-II/ Estd Branch/A-12/Salabat Khan/ Comp. Sci / Dated Peshawar the 30/10/2020

To

The Principal  
Govt; Degree College, Mir Ali,  
North Waziristan, Tribal District.

SUBJECT ADJUSTMENT/ DELAY AND STAY ON HUMANITARIAN BASIS DUE TO PANDEMIC.

Respected Sir, السلام عليكم

I am directed to refer to your letter No. 9568 dated 17.09.2020 on the subject cited above and to state to apprise this office as to whether the lecturer concerned has reported for duty or otherwise?

Furthermore, the lecturer concerned may be directed to apply for extension/ ex-post fact sanction in study leave w.e.f 16.07.2020 duly supported by leave admissibility report and leave proforma duly authenticated by the District Accounts Officer, concerned to this office for onward submission to the Provincial Government at the earliest, please.

20/10/2020  
ADMINISTRATIVE OFFICER

O/C

*[Handwritten signature]*

Annet ✓ U

Annex-D

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**OFFICE OF THE PRINCIPAL GOVT: DEGREE COLLEGE MIR ALI NWTD**

No. 9707 Dated GDC Mir Ali The 29 /09/2021.

To

The Director Of Higher Education  
Khyber Pakhtoonkhwa Peshawar.

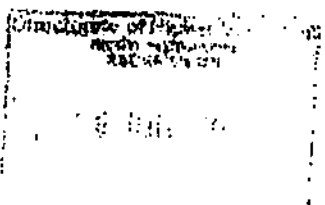
**SUBJECT: ADJUSTMENT/DELAY AND STAY ON HUMANITERIAN BASIS DUE TO PANDEMIC.**

Memo:

P-36/F

Reference to your letter No.11164 /CA-II/Estt: branch/A-12/salabat khan/comp: sc: dated; 24-05-2021, it is stated that our college has two gates, one of which is located in front of Army castle. Due to security threats we have to keep the said gate closed. Unfortunately the postman, being new in the area, brought letters on the gate which is kept closed. Thus the postman could not deliver the letters. It is also clarified that the college is running in full swing and all the students and college staff is attending college regularly.

Moreover, we have submitted the leave application of Mr. Selabat Khan in the District Account Office Miran Shah where it is under process. We will send the case as soon as it is cleared from the Account Office.



*[Handwritten signature]*



Principal  
Govt: degree College  
Mir Ali NWTD

*[Handwritten initials]*





# DIRECTORATE OF HIGHER EDUCATION

## KHYBER PAKHTUNKHWA

### Rano Garhi, Peshawar

Tel # 091-2850025 / 9330496

E-mail:- [dhekpkeshe@gmail.com](mailto:dhekpkeshe@gmail.com) Facebook.com/dhekpkeshe Twitter.com/dhekpkeshe

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Annex - E

CA-1/ Estt Branch/ Airt/ Salabat Khan/ Compr Sci Dated Peshawar the 24/6/2021

To

The Principal  
Govt; Degree College, Mir Ali,  
North Waziristan, Tribal District.

SUBJECT ADJUSTMENT/ DELAY AND STAY ON HUMANITARIAN  
BASIS DUE TO illness

Respected Sir, السلام عليكم

I am directed to refer to your letter No. 9704 dated 24.06.2021 on the subject cited above and to request to clarify the following:-

- i. The lecturer concerned was granted Study Leave for 1413 days w.e.f 01.09.2016 to 15.07.2021 vide Provincial Government Notification dated 03.11.2017 which has been expired on 15.07.2020. He has now applied for Extra Ordinary Leave (without pay) for 484 days commencing w.e.f 02.09.2021. There is a gap of period from 16.07.2021 to 01.09.2021 between two spells of leave which needs clarification with documentary proof.
- ii. Your letter under reference dated 24.06.2021 has been received in this office on 02.08.2021 after a considerable delay of 1 ½ month. Such like cases are required to be sent to this office well before the commencement of leave.
- iii. Cases of such severity may be meticulously examined at your own level before sending to this office in future as the case in hand speaks that it has not been pursued vigorously resulting in embarrassment both for the Department and the concerned officer.

  
ASSISTANT DIRECTOR (ESTT:)

Endst; No. 18588

Copy of the above is forwarded to the Section Officer (Colleges-II), Govt; of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.

  
ASSISTANT DIRECTOR (ESTT:)



**DIRECTORATE OF HIGHER EDUCATION**

**KHYBER PAKHTUNKHWA**

**Rano Garhi, Peshawar**

Tel # 091-2650025 / 9330498

E-mail:- [dhokppkposh@gmail.com](mailto:dhokppkposh@gmail.com) Facebook.com/dhokppeshawar Twitter.com/dhokppeshawar

CA-11/ Estt Branch/A-11/Salabat Khan/ Comp Sci

Dated Peshawar the 11/9/2021

Annex-F

Annex-F

The Secretary  
Govt. of Khyber Pakhtunkhwa  
Higher Education Department, Peshawar.

**SUBJECT ADJUSTMENT/ DELAY AND STAY ON HUMANITARIAN BASIS DUE TO PANDEMIC.**

Respected Sir. *محترم سر*

I am directed to refer to the subject cited above and to state that Study Leave 1413 days on half average pay w.e.f 01.09.2016 to 15.07.2020 was sanctioned in favour of Mr. Salabat Khan, Lecturer in Computer Science, Govt; Degree College, Mir Ali, North Waziristan, Tribal District pursuing Ph.D Studies at Beijing Institute of Technology, China under Chinese Govt; Scholarship Program vide Provincial Government Notification dated 03.11.2017 (F/A). After merger of erstwhile F/A, this office vide letter dated 02.10.2020 asked the Principal as to whether the lecturer concerned was reported for duty or otherwise (F/B). Meanwhile, the Principal forwarded a letter dated 17.09.2020, received in this office on 29.09.2020 alongwith original self-explained letter in respect of the lecturer concerned that due to Covid-19 and un-availability of flights from China, he couldn't arrive well on time (F/C & F/D). This office, vide letter dated 20.10.2020 asked the Principal to apprise this office as to whether the lecturer has reported for duty or otherwise with further direction to apply for extension/ ex-post facto sanction in Study Leave duly supported by Leave admissibility report (F/E). This office sent ample reminders to Principal to furnish the requisite information vide letters dated 13.11.2020, 04.02.2021 and 31.03.2021 (F/F, F/G & F/H) and this office letter dated 31.03.2021 was returned by the Post Office with the remarks that the College is closed due to Covid-19 and this office informed the Principal about the displeasure of this office over the clumsy situation and again asked him to provide the requisite information vide letter dated 24.05.2021 (F/J) who, in response informed this office that the leave application is under process at the office of District Accounts Officer, Miranshah (F/K). The Principal vide letter dated 24.06.2021 finally sent Leave admissibility report which was returned with some observations as the same was not clear and there were some omissions in Leave admissibility report (F/L & P/M).

2. Now the revised Leave admissibility report has been received from the Principal which is enclosed herewith in original (F/N) vide his letter dated 30.08.2021 (F/N) wherein he requested for sanction to the grant of 484 days Extra Ordinary Leave (without pay) w.e.f 16.07.2020 to 12.11.2021 to the officer concerned on humanitarian grounds due to Covid-19.

The nutshell of the case is that the case constantly remained under correspondence between the Principal and this office due to non-serious perusal/ examination on the part of Principal concerned officer.

In sequel in view, it is requested that Extra Ordinary Leave for the said period may be sanctioned to the officer concerned, please.

Yours Faithfully,

*[Signature]*

BY: DIRECTOR (ESTABLISHMENT)

Endst; No. 4916

Copy of the above is forwarded to the Principal, Govt; Degree College, Mir Ali, North Waziristan, Tribal District with reference to his letter No. 9729 dated 30.08.2021.

*[Signature]*  
BY: DIRECTOR (ESTABLISHMENT)

*[Handwritten signature]*



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

Annex-6

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Annex-6 27

No.SO(C-II)/HED/12-6/2021/Salbat Khan  
Dated Peshawar the 15<sup>th</sup> October, 2021

To

The Director,  
Higher Education Khyber Pakhtunkhwa,  
Peshawar.

SUBJECT: **RESUMPTION OF CHARGE / DUTY**

P-SI/F

I am directed to refer to your letter No.4915/CA-II/Estt: Branch/A-12/Salabat Khan/Comp: Sci: dated 15-09-2021 on the subject noted above and to request to initiate wilful absence proceedings under (E&D) Rules, 2011 against Mr. Salabat Khan Lecturer in Computer Science GDC Mirali North Waziristan Tribal District **within 07-days**.

I am further directed to request to explain as to why disciplinary action has not been taken in the instant case under the relevant rules so far.

*(Signature)*  
SECTION OFFICER (COLLEGES-II)

*Case Already done  
15/10/2021. at P-SI/F + P-Sy/R*

3258 326

*DA/E,  
22/10/21*

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*(Signature)*

*(Signature)*  
ASSISTANT DIRECTOR (EST)



# DIRECTORATE OF HIGHER EDUCATION

KHYBER PAKHTUNKHWA

Rano Garhi, Peshawar

Tel # 091-2650025 / 9330496

E-mail:- [dhekpkes@peshawar.gov.pk](mailto:dhekpkes@peshawar.gov.pk) Facebook.com/dhekpkes Peshawar Twitter.com/dhekpkes Peshawar

CA-II/ Estt Branch/A-12/Salabat Khan/Comp Sci

Dated Peshawar the 26/10/2021

To

**REGISTERED  
MOST IMMEDIATE**

Mr. Salabat Khan S/O Noor Mohammad Khan  
Lecturer in Computer Science  
Sada Khel, Post Office Domel, Tehsil Domel,  
District Bannu.

**SUBJECT: ABSENCE NOTICE.**  
Memo:

I am directed to refer to the subject cited above and to state that you were granted Study Leave for 1413 days on half average pay w.e.f 01.09.2016 to 15.07.2020 for pursuing Ph.D studies at Beijing Institute of Technology, China under Chinese Govt; Scholarship Programme. As per report of Principal, Govt; Degree College, Mir Ali, Tribal District, North Waziristan, you applied for extension in Study Leave w.e.f 16.07.2020 to 12.11.2021 which was regretted by the Competent Authority. You have been continuously absent from your duties since 16.07.2020 till date.

You are hereby directed in your own interest to report for duties within 15-days of the issuance of this notice and explain the reason of your willful absence from duties failing which it will be presumed that you are no more interested in your service and ex-parte action will be taken against you culminating in your dismissal from service.

*26/10/21*  
ASSISTANT DIRECTOR (ESTT:)

Endst; No. 05/2021

Copy of the above is forwarded to the:-

1. Section Officer (Colleges-II), Govt; of Khyber Pakhtunhwa, Higher Education Department, Peshawar with reference to his letter No. SO (Colleges-II)/ HED/12-6/2021/Salabat Khan dated 15.10.2021 with the request that the case remained under correspondence between the Principal and this office and got delayed due to Covid-19 Pandemic, please.
2. Principal, Govt; Degree College, Mir Ali, Tribal District, North Waziristan with reference to his letter No. 9729 dated 30.08.2021.

*26/10/21*  
ASSISTANT DIRECTOR (ESTT:)

*[Handwritten signature]*

Annex I

http://www.dailymashriq.com.pk

اللہ ہی کیلئے ہیں شرق و مغرب: القرآن

**DAILY MASHRIQ PESHAWAR**

پشاور

روزنامہ

سیدتان میر شاہ

**مشرق**

سلسلہ اشاعت کے 55 سال

پشاور اور اسلام آباد سبیک وقت شائع ہونے والا کثیر الاشاعت قومی اخبار

ABC CERTIFIED

جلد 55 | شمارہ 5 | جاری شدہ 1443ھ | 9 جنوری 2022ء | 24 دسمبر 2021ء | 80

### ABSENCE NOTICE

You, Mr. Salabat Khan, Lecturer in Computer Science, Govt. Degree College, Mir Ali, North Waziristan, Tribal District joined this Department on 06.12.2012. You were granted Study Leave for a period of 1413 days w.e.f 01.09.2016 to 15.07.2020 (on half average pay) for doing Ph.D studies at Beijing Institute of Technology, China under Chinese Govt. Scholarship Programme. On expiry of leave, you were required to report for duty but you have failed to join your duties. You applied for extension in Study Leave but the same was regretted by the Competent Authority. The Director, Higher Education, Khyber Pakhtunkhwa sent an absence notice on your home address on 26.10.2021 under registered cover with the direction to report for duty but no avail. You have been continuously absent from your duties since 16.07.2020 till date.

You are hereby directed in your own interest to report for duties within 15 days of the issuance of this notice and explain the reason of your ~~willful absence from duties~~ failure which it will be presumed that you are no more interested in your service and ex-parte action will be taken against you culminating in your dismissal from service.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT, PESHAWAR.**

ہمارا ایمان  
کریپشن فری پاکستان

INF(P) 16/2022



*Handwritten signature*



پاکستان کے 11 شہسروں سے یک وقت شائع ہونے والی سانسپار  
ہفت روزہ 20 جولائی 2022ء | جمعہ 12 جولائی 2022ء | قیمت 12 روپے

Annex-I 6  
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## ABSENCE NOTICE

You, Mr. Salabat Khan, Lecturer in Computer Science, Govt. Degree College, Mir Ali, North Waziristan, Tribal District joined this Department on 06.12.2012. You were granted Study Leave for a period of 1413 days w.e.f 01.09.2016 to 15.07.2020 (on half average pay) for doing Ph.D studies at Beijing Institute of Technology, China under Chinese Govt; Scholarship Programme. On expiry of leave, you were required to report for duty but you have failed to join your duties. You applied for extension in Study Leave but the same was regretted by the Competent Authority. The Director, Higher Education, Khyber Pakhtunkhwa sent an absence notice on your home address on 26.10.2021 under registered cover with the direction to report for duty but to no avail. You have been continuously absent from your duties since 16.07.2020 till date.

You are hereby directed in your own interest to report for duties within 15-days of the issuance of this notice and explain the reason of your willful absence from duties failing which it will be presumed that you are no more interested in your service and ex-prate action will be taken against you culminating in your dismissal from service.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT PESHAWAR.

Our Faith,   
Corruption Free Pakistan

INF(P)16 / 2022



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

Dated Peshawar the 17<sup>th</sup> May, 2022

**NOTIFICATION**

**No. SO(C-II)/HED/12-6/2022/Salabat Khan.** WHEREAS Mr. Salabat Khan, Lecturer in Computer Science (BS-17), Govt. Degree College Mirall, North Waziristan remained absent from duty since 16.07.2020 till date.

2. **AND WHEREAS** absence notices were issued to him at his home address as well as published in leading newspapers with the direction to resume duty within 15 days, failing which ex-parte action under Khyber Pakhtunkhwa (Efficiency & Discipline) Rules, 2011 will be initiated against him.

3. **AND WHEREAS** the accused Lecturer did not report for duty within stipulated time.

4. **NOW THEREFORE**, the Chief Secretary, Khyber Pakhtunkhwa in exercise of powers conferred upon him under Rule-9 of the Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011, is pleased to impose the major penalty of "Removal from Service" upon Mr. Salabat Khan, Lecturer in Computer Science (BS-17), Govt. Degree College Mirali, North Waziristan with immediate effect. His absence from duty w.e.f 16.07.2020 till imposition of penalty shall be treated as unauthorized absence from duty.

-Sd-  
**SECRETARY**  
HIGHER EDUCATION DEPARTMENT

**ENDST: NO. & DATE EVEN.**

Copy forwarded to:-

1. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
2. Director-IT, HEMIS Cell, Higher Education Department.
3. Principal, Govt. Degree College Mirall, North Waziristan.
4. District Accounts Officer, North Waziristan.
5. PS to Secretary Higher Education Department.
6. Lecturer concerned.
7. Master File.

(SAMEERA SABA)  
SECTION OFFICER (COLLEGES-II)

DD (E) /

*[Handwritten signature]*  
27/5

7044 152

**BEFORE THE HON'ABLE SERVICE TRIBUNAL, KHYBER PAKHTUNWA  
PESHAWAR.**

**S.A No. 1462/2022**

Salabat Khan .....Appellant

**Versus**

Govt. of Khyber Pakhtunkhwa  
Through Secretary, Higher Education  
And others.....

Respondents

**AFFIDAVIT**

I, Farid ullah shah, Director Higher Education do hereby declare and affirm on oath that the contents of Para Wise Comments are correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Identified by:



Deponent

Director Higher Education  
Khyber Pakhtunkhwa  
Khyber Road Peshawar



**DIRECTORATE OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA  
RANO GHARI, NEW CHAMKANI CHOWK, PESHAWAR**

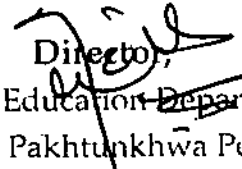
Tel # 091-2650024 Fax # 091-2260181

E-mail: [dhekpkesh@gmail.com](mailto:dhekpkesh@gmail.com) [Facebook.com/dhekpkesh](https://www.facebook.com/dhekpkesh) [Twitter.com/dhekpkesh](https://twitter.com/dhekpkesh)

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AUTHORITY LETTER

Mr. Sohrab, Lecturer in Law (BPS-17), Govt Degree College, Mathra, Peshawar is hereby authorised to submit PARAWISE COMMENTS in SA#1462/2022 titled Salabat Khan vs Govt of KPK on behalf of the respondents.

  
Director,  
Higher Education Department  
Khyber Pakhtunkhwa Peshawar

Director Higher Education  
Khyber Pakhtoon Khwa  
K. J. Road Peshawar