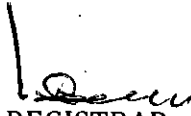



Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 509/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	11/04/2018	<p>The appeal of Mst. Farida Naz presented today by Syed Noman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 11/4/18</p>
2	12/04/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17/04/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

17.04.2018

Counsel for the appellant ~~Mr~~ Farida Naz present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Primary School Teacher vide order dated 03.04.2009 while private respondent No. 6 Mst. Saima Bibi was appointed as Primary School Teacher vide order dated 14.05.2009. It was further contended that according to merit list the appellant was shown at serial No. 1 while private respondent No. 6 was shown at serial No. 2. It was further contended that as per appointment order and merit list the appellant is senior than the private respondent No. 6 but the respondent department has promoted private respondent No. 6 from the post of PST to SPST vide order dated 21.12.2017 and ignored the appellant from promotion despite the facts that the appellant is senior than the private respondent No. 6 therefore, the appellant filed departmental appeal on 30.12.2017 but the same was not responded hence, the present service appeal on 11.04.2018. It was vehemently contended that the appellant is senior to the private respondent No. 6 but the respondent-department has ignored the appellant from promotion therefore, the promotion order of private respondent No. 6 is illegal and liable to be set-aside.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 09.05.2018 before S.B.

Appellant Deposited
Security & Process Fee

MA
(Muhammad Amin Khan Kundi)
Member

09.05.2018

The Tribunal is non functional due to retirement of the Honorable Chairman. Therefore, the case is adjourned. To come up for the same on 02.07.2018 before S.B.



Reader

22.07.2018

Counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Mr. Akram Khan, Superintendent & Mr. Diljan, Assistant of the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on ~~02.08.2018~~ ^{24.7.2018} before S.B.



Member

24.07.2018

~~24.07.2018~~


Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Mr. Dil Jan Assistant representative of the respondents absent. He be summoned with the direction to submit written reply/comments on the date fixed as 30.08.2018 before S.B. the respondent department absent. He be summoned with the direction to furnish reply/Para wise comments on the date fixed as 30.08.2018 before S.B.


Member

Member

30.08.2018

Counsel for the appellant and Mr. Kabirullah Khattak, AAG alongwith Dil Jan Assistant DEO (F) for the respondents present. Written reply submitted on behalf of the respondent No. 5. Written reply not submitted on behalf of the remaining respondents No.1 to 4. None present on behalf of the private respondent No.6. Requested for adjournment. Adjourned. To come up for written reply/comments on 31.10.2018 before S.B.


(Muhammad Amin Kundi)
Member

38-10-18

Due to retirement of Honorable
chairman the Tribunal is non
functional therefore the case is
adjourned to come up for the same
on 17-12-2018

Reader

17.12.2018

Learned counsel for the appellant and Mr. Mr. Kabirullah Khattak learned Additional Advocate General present. Written reply not received. Notice be issued to the respondents with the direction to file written reply. Adjourn. To come up for written reply/comments on 23.01.2019 before S.B.


Member

23.01.2019

Learned counsel for the appellant present. M/S Shakeel Superintendent and Dil Jan Superintendent representatives present. Written reply already submitted on behalf of respondent No.5, Shakeel Superintendent representative of respondents No.1 & 2 seeks time to furnish written reply/comments. No one present on behalf of private respondent No.6. Notice be issued to respondent No.6 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 13.02.2019 before S.B.



Member

13.02.2019

Father of the appellant on behalf of appellant present. Nazseer ADO for respondent No.4 an Muhammad Nazeer ADEO for respondent No.5 present. Written reply already submitted on behalf of respondents No.4 & 5. Hayat AD representative of respondents No.2 present and stated that respondent No.2 relies on the written reply submitted on behalf of respondents No.4 & 5. Learned counsel for respondent No.6 also present and seeks time to furnish written reply/comments. No one present on behalf of respondent No.1 & 3. Notice be issued to respondents No.1 & 3 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 26.03.2019 before S.B.


Member

26.03.2019

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith M/S Akram Superintendent and Shakeel Ahmad Superintendent for official respondents present. Written reply already submitted on behalf of respondents No.4 & 5. Learned AAG stated that the remaining respondents rely on the reply of respondents No.4 & 5. Written reply on behalf of private respondent No.6 still awaited. Amjid Nawaz Advocate appeared on behalf of private respondent No.6 and requested for time to furnish written reply/comments. Granted. To come up for written reply/comments on 25.04.2019 before S.B


Member

25.04.2019


Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith M/S Muhammad Nazir, ADEO (Litigation), Mukhtiar Alam, ADO for official respondents No. 1 to 5 and Mr. Muhammad Imran, husband of private respondent No. 6 present. Written replies on behalf of official respondents No. 1 to 5 have already been submitted. Written reply on behalf of private respondent No. 6 submitted today. Copy of the same is handed over to learned counsel for the appellant. Adjourned to 30.05.2019 for rejoinder and arguments before D.B-II.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

30.05.2019

Counsel for the appellant present. M/S Aqeel Ahmad, ADO (M) and Muhammad Nazir, ADO (F) alongwith Mr. Kabirullah Khattak, Additional AG for official respondents No. 1 to 5 present. Learned counsel for the appellant requested for adjournment to furnish rejoinder. Adjourned to 10.07.2019 for rejoinder and arguments before D.B.

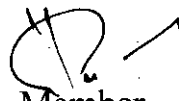

(HUSSAIN SHAH)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

10.07.2019

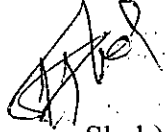
Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Learned counsel for private respondent also present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 03.09.2019 before D.B.


Member

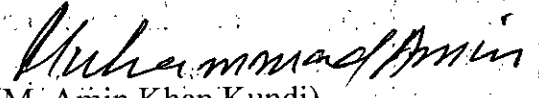

Member

03 .09.2019

Learned counsel for the appellant present. Mr. Riaz Khan Pindakhel learned Assistant Advocate General for the respondents present. Learned counsel for the appellant seeks withdrawal of the present service appeal that the grievance of the appellant has been redressed. In this regard signature of learned counsel for the appellant has been obtained on the margin of order sheet. Consequently the present service appeal is dismissed as withdrawn. No order as to costs. File be consigned to the record room.



(Hussain Shah)
Member



(M. Amin Khan Kundi)
Member

ANNOUNCED
03.09.2019

I withdraw the instant appeal.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 509 /2018

Farida NAz

V/S

Education Deptt

INDEX

S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal	-----	1-4
2.	Copy of appointment order	A	5
3.	Copy of appointment order of R-6	B	6
4.	Copy of merit list	C	7
5.	Copy of documents	D	08-13
6.	Copy of rules	E	14-20
7.	Copy of promotion order	F	21-22
8.	Copy of departmental appeal	G	23
9.	Vakalat nama	-----	24

APPELLANT

THROUGH:

Handwritten signature
(SYED NOMAN ALI BUKHARI)

Handwritten signature
(UZMA SYED)

ADVOCATES, HIGH COURT.

Cell No: 0335-8390122

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 509 /2018

Farida Naz D/o Muhammad Anwar
R/o Nar Muhammad Khan Ghazni Khel, Tehsil Naurang,
District Lakki Marwat, presently at GGPS,
Dakhli Nar Muhammad Khan Ghazni Khel,
Tehsil Naurang, District Lakki Marwat as PST.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 530

Dated 11-4-2018

(Appellant)

VERSUS

1. The Secretary to Government of Khyber E&SE Education, Peshawar.
2. The Director E&SE Education Khyber Pakhtunkhwa, Peshawar.
3. The Deputy Commissioner, Lakki Marwat.
4. The Executive District Officer (E&SE) Lakki Marwat.
5. The District Education Officer (Female) Lakki Marwat.
6. Miss. Saima Bibi D/o Islam Jan ~~Khel, Tehsil Naurang~~ District Lakki Marwat.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER OF DISTRICT EDUCATION OFFICER, LAKKI MARWAT VIDE ENDST: NO. 12670-77 DATED 21.22.2017, WHEREBY THE RESPONDENT NO. 4, DISTRICT EDUCATION OFFICER (FEMALE), LAKKI MARWAT IGNORED THE APPELLANT AND PROMOTED/ ADJUSTED (OUT OF TURN) THE RESPONDENT NO. 6 ON THE POST OF SENIOR SCHOOL TEACHER (SST, BIO-CHEMISTRY).

Filed to-day

Registrar

11/4/18

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE RESPONDENT MAY BE DIRECTED TO CONSIDER AND PROMOTE THE APPELLANT FOR PROMOTION BEING SENIOR MOST TO THE POST OF SENIOR SCHOOL TEACHER (SST) FROM HER DUE DATE i.e (JUNIOR WAS PROMOTED VIDE ORDER DATED 21.22.2017) WITH ALL BACK AND BENEFIT. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That, appellant was appointed as Primary School Teacher (PST) against vacant post at Union Council Marmandi Azeem, in Education Department, Lakki Marwat vide Endst: No. 4798-4803 dated 30.04.2009 and subsequently the appellant has taken the charge of the said post on 02.05.2009 and since the date of induction of petitioner in service, she was regularly performing her duties to the best of her ability and to the entire satisfaction of her superiors. **Copy of appointment order is attached as Annexure-A).**
2. That similarly, respondent No. 6, namely Saima Bibi was also appointed as Primary School Teacher (PST) against vacant post in Education Department, Lakki Marwat vide Endst: 5531-35 dated 14.05.2009 as PST against the vacant post at Union Council Marmandi Azeem. **Copy of appointment order is attached as Annexure-B).**
3. That in the year 2017, various posts of Senior School Teacher (SST, Bio-Chemistry) laying vacant for promotion quota in the Education Department of District Lakki Marwat for which ASDEO Circle U.C Marmandi Azeem, was directed to furnish the names of Primary School Teacher (PST) who are fit for promotion as per seniority, so that the same shall be forwarded for recommendation to Department Promotion Committee. **Copy of merit list is attached as Annexure-C.**
4. That the appellant was eligible and senior most but despite that neglected by the ASDEO Circle U.C Marmandi Azeem, and the name of respondent No. 6, was forwarded to District Education Officer, (Female), Lakki Marwat (respondent No. 4) for recommendation of Departmental Promotion Committee instead of petitioner. Thereafter, respondent No. 5, District Education Officer (Female), Lakki Marwat intentionally ignored the facts and circumstances, and on vide order dated 21.12.2017 Endst: No. 12670-77, promoted/adjusted the respondent No. 6 on the Post of Senior School Teacher (SST, Bio-Chemistry). **Copy of documents, rules and promotion order is attached as Annexure-D, E & F.**


5. That the appellant filed Departmental appeal being aggrieved but the said appeal was not responded with in statutory period of 90 days. Hence the present appeal on the following grounds. **Copy of departmental appeal is attached as Annexure- G.**

GROUND:



- A. That order dated 21.12.2017 and not taking action on the departmental appeal of the appellant within statutory period of 90 days is against the law, fact, norm of justice and material on record.
- B. That, it is harsh and discrimination towards the appellant to ignore her without giving any reason and opportunity of personal hearing.
- C. That, such like promotion of respondent No. 6, is not only against the natural law and justice, but also against land laws to dismiss any person without any prior notice to him.
- D. That, ignoring the appellant from promotion is against factual position and record of the School / Education Office and Seniority list Department and Union Council.
- E. That inaction and omission of respondent department, not to consider the appellant for promotion is against the spirit of section-9 of Civil Servants Act,1973 and service rights duly protected under the Civil Servants laws .
- F. That the apex Court has already clearly held in case of Anita Turab (PLD-2013 Supreme Court Page No. 195) that matter of tenure, appointment, posting, transfer and promotion, of service could not be dealt with in an arbitrary manner but could only be sustained if it was in-accordance with law. Whenever there was statutory provision or rules or regulation of government the matter of appointment of Civil Servants that must be followed honestly and scrupulously and discretionary must be exercised and structured, transparent and reasonable manner, thus the verdict of the Honorable Supreme Court fully favours the appellant's case.
- G. That as there is no any order regarding the stoppage of promotion of appellant, therefore, the appellant has legal vested rights to be considered for promotion from the date when post is available for him in his quota. (97-SCMR-1997-515).

- H. That the appellant has not been treated and accordance with the law and has been discriminated because his other colleagues have been promoted without course and ignored the appellant despite of having seniority eligibility and post of availability.
- I. That, against the illegal and unjust demotion of the appellant, the appellant had preferred a Departmental Appeal dated 30.12.2017 to the Director (E&SE) Education Khyber Pakhtunkhwa Peshawar which was turned down by the said Authority, hence the appellant has recourse to this Honorable Tribunal.
- J. That, personal hearing, being mandatory, was not afforded to the appellant what to speak of providing him opportunity of self defense.
- K. That, appellant being employee, was not amenable to any penal action, so the impugned orders are based on ulterior motive.
- L. That, any other point may also very graciously be allowed to be raised by the appellant's counsel during the course of advancing arguments.
- M. That, in order to get the directions issued, appellant places following documents on record:
- N. That the appellant seeks permission to advance other grounds and proofs at the time hearing.

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


APPELLANT
Farida Naz

THROUGH:


(SYED NOMAN ALI BUKHARI)

(UZMA SYED)
ADVOCATES, HIGH COURT.

ANNEXURE "A"

Consequent upon the recommendations of District Selection Committee, the below named female candidate is hereby appointed as Primary School Teacher in BPS-07 (Rs 3530-190-9230), plus usual allowances as admissible to her under the rules on regular basis under the provision of Establishment & Administration Department circular bearing No. SOR - 6 (E&AD) 13-1-2005 dated 10-8-2005 on the terms & condition noted below in the interest of public service from the date of taking over charge. UNION COUNCIL MERIT

S.No	Name	Father Name & Address	UC	To be posted at	Remarks
1	Farida Naz	Muhammad Anwar R/o Kotka Muhammad Hassan	Marmandi azim	GCMS, Nar Kala Khan	NCP

TERMS AND CONDITIONS:

1. Her appointment will be considered regular without pension or gratuity in terms of section 19 of NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act, 2005. They will however be entitled to contributory provident fund in such a manner and at such rate as prescribed by the Govt.
2. Her services will be liable to termination on one-month prior notice from either side. In case of resignation with out notice two months pay/allowances shall be refunded to the Govt.
3. Her services will be governed by such rules and regulations issued by the Govt of NWFP from time to time.
4. Her services can be terminated at any time in case their performance is found un satisfactory during probationary period; in case of misconduct they will be dealt with the NWFP removal from service (special power) ordinance, 2000 and the rules framed from time to time.
5. Charge report should be submitted to all concerned.
6. No TA/DA is allowed to any one.
7. The undersigned will check and verify the Certificates/ Degrees of the above candidates from the concerned Board/University before the drawl of their pay.
8. The appointment is liable to termination; if the appointee fails to take over charge with in (15) days of the commencement date.
9. The undersigned reserves the rights of amendment in their appointment order in case of any mistake.
10. The appointee is required to produce their Health and Age Certificates from the Medical Supdt: DHQ Hospital (Tajazia) Lakki Marwat.

(Noor Hassan Khan)
 Executive District Officer
 (E & S) Education Lakki Marwat

Endst: No 4798-4803 dated Lakki Marwat the 30/4/09

- Copy of the above is forwarded to the:
1. Director (E & S) Education Department N W F P Peshawar.
 2. District Co-ordination Officer Lakki Marwat
 3. Medical Superintendent DHQ Lakki Marwat
 4. District Accounts Officer Lakki Marwat
 5. Deputy District Officer female local office
 6. Head teacher concerned
 7. Candidate concerned

[Signature]
 Executive District Officer
 (E & S) Education Deptt: Lakki Marwat

CT-1
 R

*from over charge on
 02.5.2009 (FN) at
 GCMS Nar Kala*

ATTESTED

ANNEXURE "B"

P-08

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDUCATION LAKKI MARWAT
APPOINTMENT ORDER:

Consequent upon the recommendations of District Selection Committee, the below named female candidate on union council merit is hereby appointed as Primary School Teacher in BPS-07 (Rs 3530-190-9230), plus usual allowances as admissible to her under the rules on regular basis under the provision of Establishment & Administration Department circular bearing No. SOR - 6 (E&AD) 13-1/2005 dated 10-8-2005 on the terms & condition noted below in the interest of public service from the date of taking over charge.

Union Council Merit

S.No	Name	Father Name & Address	UC	To be posted at	Remarks
1	Saima Bibi	Islam Jan R/o Nar Muhammad Khan Ghazni khel	Marmani da Azim	GGPS Yasin Manjiwala	Against vacant post

TERMS AND CONDITIONS:

1. Her appointment will be considered regular without pension or gratuity in terms of section 19 of NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act, 2005. They will however be entitled to contributory provident fund in such a manner and at such rate as prescribed by the Govt.
2. Her services will be liable to termination on one-month prior notice from either side. In case of resignation with out notice two months pay/allowances shall be refunded to the Govt.
3. Her services will be governed by such rules and regulations issued by the Govt of NWFP from time to time.
4. Her services can be terminated at any time in case their performance is found un satisfactory during probationary period, in case of misconduct they will be dealt with the NWFP removal from service (special power) ordinance, 2000 and the rules framed from time to time.
5. Charge report should be submitted to all concerned.
6. No TA/DA is allowed to any one.
7. The undersigned will check and verify the Certificates/ Degrees of the above candidates from the concerned Board/University before the drawl of their pay.
8. The appointment is liable to termination, if the appointee fails to take over charge with in (15) days of the commencement date.
9. The undersigned reserves the rights of amendment in their appointment order in case of any mistake.
10. The appointee is required to produce their Health and Age Certificates from the Medical Supdt: DHQ Hospital (Tajazia) Lakki Marwat.

(Noor Hassan Khan)
Executive District Officer
(E & S) Education Lakki Marwat

Endst: No 5531-35 dated Lakki Marwat the 14-5-09
Copy of the above is forwarded to the:

1. Director (E & S) Education Department N W F P Peshawar.
2. District Co-ordination Officer Lakki Marwat
3. Medical Superintendent DHQ Lakki Marwat
4. District Accounts Officer Lakki Marwat
5. Deputy District Officer female local office
6. Head teacher concerned
7. Candidate concerned

Executive District Officer
(E & S) Education Deptt: Lakki Marwat

C.T.L
P

ATTESTED

191 A-17

Annexure B-1 CS

Annexure B-1 P-07

S.No	R.No	F.No	Name	Father Name	DOB	SSC		FA		BA		MA		PTC		Exp	T.Score				
						Obt	Total	Obt	Total	Obt	Total	Obt	Total	Obt	Total						
3	385	567	Najma Shaheen	Khandan Khan	25-12-1984	571	850	20.153	785	1100	14.273	297	550	5.4	581	900	19.3667	59.1923			
4	379	82	Parveen	Mushk E Alam	04-02-1982	557	850	19.859	673	1100	12.236	343	550	6.236	621	900	18.4567	59.1093			
5	393	163	Zabeen Begum	Nasib Ali Shah	12-04-1987	557	850	20.012	671	1100	12.2	296	550	5.382	600	900	20.7	58.2596			
6	367	199	Zareen Bibi	Gula Din	04-05-1982	550	850	18.706	682	1100	12.4	277	550	5.036	569	900	18.9557	54.7918			
7	367	199	Zareen Bibi	Amir Piaw Jan	02-07-1984	538	850	18.988	630	1100	12.55	296	550	5.382	573	900	19.1	53.6574			
8	359	506	Shasoom Bibi	Zahir Shah	05-10-1983	497	850	17.517	654	1100	11.891	299	550	5.436	589	900	19.6333	53.4708			
9	391	85	Nabila Latif	Abdul Latif Khan	02-04-1989	628	850	22.165	642	1100	11.673	259	550	4.709	###	2350	3.4	54.9	50.0	18.3	53.4592
10	372	477	Musarat Yasmin	Hayat Ullah Jan	16-05-1982	412	850	14.541	666	1100	12.473	259	550	4.709	540	900	18.3	52.7594			
11	367	203	Ruqa Bibi	Saifullah Khan	10-05-1985	514	850	18.141	631	1100	11.473	283	550	5.145	541	900	18.0333	51.521			
12	370	793	Gul Rubani	Azed Khan	16-12-1984	496	850	17.506	601	1100	10.927	278	550	5.055	544	900	18.1333	50.1323			
13	376	408	Munira Jabeen	Mira Jan Shah	01-12-1979	460	850	16.235	549	1100	9.9818	318	550	5.782	490	900	16.3333	49.9153			
14	366	403	Noor Shahida Begum	Gul Rauf	16-09-1982	457	850	16.129	614	1100	11.164	566	900	6.289	591	900	19.7	49.0658			
15	377	134	Naheed Akhtar	Muhammad Ramzan	01-11-1979	372	850	13.129	569	1100	10.345	324	550	5.891	521	900	17.3667	49.0244			
16	384	565	Waheeda Gul	Shah Alam Khan	22-09-1987	456	850	16.034	564	1100	10.8	262	550	4.764	524	900	17.4667	48.4153			
17	354	102	Shasta Nigar	Ghulam Ikhtia	04-12-1982	473	850	16.634	557	1100	9.7536	247	550	4.491	488	900	16.2567	48.256			
18	371	469	Zeenat U Nisa	Rasool Ghulam	04-04-1983	469	850	16.553	581	1100	10.564	268	550	4.873	599	900	19.9667	48.1442			
19	381	333	Zarina Begum	Shamir Khan	14-04-1983	395	850	13.941	528	1100	9.6	255	550	4.636	569	900	18.9667	47.5421			
20	376	159	Mehr U Nisa	Altat U Rehman	01-02-1986	431	850	15.212	467	1100	8.4909	268	550	4.873	763	900	25.4333	47.3991			
21	382	569	Kalsoom Fatima	Muhammad Ajmal Khan	12-02-1977	405	850	14.329	420	1100	7.6364			566	900	18.8667	46.087				
22	373	404	Rifat Bibi	Muzaffar Khan	15-08-1984	474	850	16.729	577	1100	10.491			811	1200	20.275	45.2943				
23	374	405	Aljazira Begum	Aghistan Khan	15-04-1983	458	850	16.165	487	1100	8.8545			568	900	18.9333	45.2724				
24	383	568	Safia Sultan	Gul Faraz Khan	01-04-1986	448	850	15.812	579	1100	10.527			597	900	19.9	44.0733				
25	392	507	Shazia Begum	Zahir Shah	01-03-1985	365	850	12.882	611	1100	11.291			607	900	20.2333	43.1627				
26	390	66	Nishad Begum	Noor Wali Begum	12-03-1985	406	850	14.329	473	1100	8.6			571	900	19.0333	42.3403				
27	378	820	Memona Begum	Saif U Rehman	11-04-1984	359	850	12.671	585	1100	10.636			496	900	16.5333	41.3109				
28	366	903	Sajida Bibi	Ghulam Muhammad	11-11-1981	429	850	15.141	530	1100	9.6364										
UNION COUNCIL BARMANDI AZEEM																					
						745	1050	21.286	770	1100	14			641	900	21.3667	56.6524				
						727	1050	20.771	700	1100	12.727			645	900	21.5	54.9987				
1	399	392	Farida Naz	Muhammad Anwar	03-11-1987	745	1050	21.286	770	1100	14			641	900	21.3667	56.6524				
2	407	406	Saima Bibi	Islam Jan	01-10-1988	727	1050	20.771	700	1100	12.727			645	900	21.5	54.9987				
3	404	831	Samrina Nawaz	Muhammad Nawaz Khan	24-03-1989	705	1050	20.143	749	1100	13.618			633	900	21.1	54.861				
4	401	132	Rubina Kausar	Mamoor Khan	01-01-1984	421	850	14.859	511	1100	9.2909	285	550	5.255	634	900	21.1333	52.5376			
5	400	130	Maria Jabeen	Kafayat Ullah Khan	01-10-1988	667	1050	18.771	645	1100	11.727			629	900	20.9667	51.4654				
6	398	645	Maria Bibi	Saad Ullah Jan	01-01-1987	428	850	15.106	623	1100	11.327	283	550	5.145	554	900	18.4567	50.4000			

ATTESTED

Roll No. 16559

Annex - 1

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 2007-UB-FEEFC-9218

University of Science & Technology Bahawalpur



Syber Bahawalpur
Pakistan

Session 2009-2011

daughter of

Muhammad Anwar Khan

a student of

District Larkana

having passed the prescribed examination held in September, 2011 is this day admitted by the

University of Science & Technology Bahawalpur

to the Degree of

Master of Arts

in Islamicat

in 2nd Division / Grade / G. P. A.

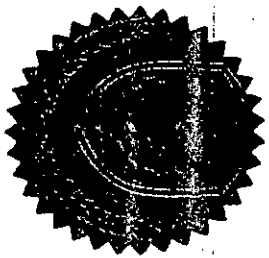
The examination was taken as a whole / in parts.

Result Declared on 10-01-2012

ATTESTED

Controller of Examinations

Registrar



Vice Chancellor

Roll No. 54982

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.

2007-UB-FEFL-9218

University of Science & Technology Bannu



Khyber Pakhtunkhwa

P. W. F. P. Pakistan

Session 2013-2014

Farida Naz

daughter of

Muhammad Anwar Khan

a student of

District Lakkj Marwat

having passed the prescribed examination held in September, 2014 is this day admitted by the

University of Science & Technology Bannu

to the Degree of

Bachelor of Education

in 2nd Division/Grade/G.P.A.

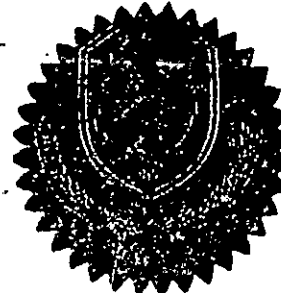
The examination was taken as a whole/in parts.

Result Declared on 25-02-2015

ATTEST

Controller of Examinations

Registrar



Vice Chancellor

Roll No. 6666

10

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.

2007-08-FEFL-9218

University of Science & Technology Bannu



شہر ہاتھنڈہ

پاکستان

Session 2007-2009

Farida Naz

daughter of

Muhammad Anwar Khan

a student of

Frontier Education Foundation Girls Degree College Sarai Naurang Lakki Marwat

having passed the prescribed examination held in June, 2009 is this day admitted by the

B.Sc

University of Science & Technology Bannu

to the Degree of

Bachelor of Science

in 2nd Division/Grade/Class.

The examination was taken as a whole/in parts.

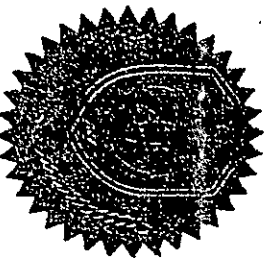
Result Declared on 09-10-2009

ATTENDED

21

Controller of Examinations

Registrar



Vice Chancellor

BU.S.No. 013662



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 16170

Board of Intermediate & Secondary Education
BANNU (N-W.F.P.), PAKISTAN.



INTERMEDIATE EXAMINATION

SESSION 2007 (ANNUAL)

Pre-Medical Group

This is to Certify that Farida Naaz

Daughter of

Muhammad Anwar Khan

Student of

Frontier Education Foundation Girls College, Serai Naurang, Lakki

has passed the **INTERMEDIATE EXAMINATION** *of the Board of Intermediates & Secondary Education, Bannu held in May, 2007 as a Regular candidate.*

She obtained 770 *marks out of 1100 and has been placed in Grade* A

Representing: **Excellent.**

Registration No: 0004-FPSNL-1-05

Date of declaration of Result: 10-08-2007

Prepared on: 28-05-2009

u. [Signature]
Asstt: Secretary

[Signature]
SECRETARY

This certificate is issued without alteration or erasure

ATTESTED

14

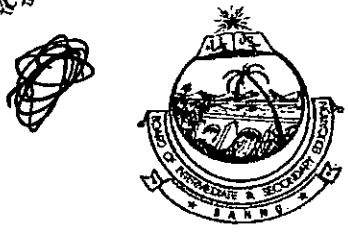


1477A

S.No. 53101

Roll No. 51184

Board of Intermediate and Secondary Education



SECONDARY SCHOOL CERTIFICATE EXAMINATION SESSION 2005 ANNUAL

This is to Certify that Farida Naaz

Daughter of Muhammad Anwar Khan

Student of Govt Girls High School Serai Naurang, Lakki

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Bannu held in March, 2005 as a Regular candidate.

She obtained 765 marks out of 1050 and has been placed in Grade A

Representing Excellent. The candidate passed in the following subjects:

1. English	2. Urdu	3. Islamiyat	4. Pakistan Studies
5. Mathematics	6. Physics	7. Chemistry	8. Biology

Date of birth according to Registration record: 03 November, Nineteen Eighty Seven . (03-11-1987)

Date of declaration of Result: 20-06-2005

Prepared on: February 26, 2007

[Signature]
Assistant Secretary

[Signature]
SECRETAR

This certificate is issued without alteration or erasure



[Signature]
ATTESTED

141311

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

PROVISIONAL RESULT CARD

13



Name: FARIDA NAAZ
 Father's Name: MUHAMMAD ANWAR KHAN
 Address: C/O HIRA MEDICAL STORE HOSPITAL
 ROAD SERAI NARUANG
 Tehsil: LAKKI MARWAT
 District: LAKKI MARWAT

Roll No. T638565
 Registration No. 06NLM0366
 Final Semester AUT- 2006

has successfully completed

PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	66
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	59
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	77
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	77
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	80
AUT- 06	0617	TEACHING OF URDU	100	68
AUT- 06	0618	TEACHING OF MATHEMATICS	100	72
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	75
AUT- 06	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	67

27/3/16
 Attested
 jpp

CREDITS: 5

Result Declared on SEPTEMBER 20, 2007

Date of issue SEPTEMBER 25, 2007

Total Marks / Obtained 900 / 641

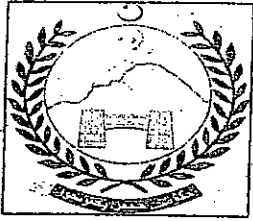
Percentage / Grade 71 A

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Controller of Examinations

ATTESTED



955

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Handwritten marks and numbers: 14, E, and other scribbles.

Peshawar, dated the 24th July, 2014.

NOTIFICATION

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) 4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
"1.	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority-cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

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1A	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	<p>recruitment; and (b) fifty percent by initial recruitment.</p> <p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:</p> <p>Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>Note:- If no suitable candidate is available in the relevant cadres of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment; and</p> <p>(b) fifty percent by initial recruitment; and</p>
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(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following Shall be substituted, in respective columns, namely:

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or (c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p style="text-align: center;">and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1. Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p style="padding-left: 40px;">Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>

ATTESTED

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				<p>Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in column No.3:</p>
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T.T to SST
post
BPS 16

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Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

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				<p>Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:</p> <p>Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and</p> <p>(ii) twenty Five percent by initial recruitment.</p> <p>Note:</p> <p>I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.</p> <p>II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately.</p>
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ATTESTED

(9) (20)

**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education-Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file.

(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

(7)

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT.

OFFICE ORDER:-

ANNEXURE FQ'S

Consequent upon the recommendations of the Departmental Promotion committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO(PE)1-5/SSRC/Meeting/2013/Teaching Cadre dated 24 July 2014, vide Director (E&SE) Khyber Pakhtunkhwa Endst. No. 1771-75/File No.2/Promotion (F) SST B-16 Lakki Marwat Dated Peshawar the 20-12-2017, the following Senior CT/SCT, DM/SDM, AT/SAT, TT/STT, Qaria/S Qaria, PSIIT/SPST/PST are hereby adjusted against the post of SST (General) SST (Bio, Chem) SST (Math, Phy) BPS-16 (Rs:18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms and condition given below with effect from the date of their promotion.

Promotion of CT/SCT, DM/SDM, AT/SAT, TT/STT, Qaria/SQaria to the post of SST (General)					
S.No.	Name of Teacher	Present post and school	Place of posting as SST (Gen.) B-16	Remarks	
01	Shagufta Yasmin SCT	GGHS, Mama Khel Marwat	GGCMS, Nar Kala Khan	Against vacant post	
02	Bibi Saeeda SCT	GGHS, No.1 Naurang	GGHS, No.1 Naurang	Against vacant post	
03	Bibi Khalida SCT	GGHS, Nar Sardar Maidad Khel	GGCMS, Gandi Umer Chikar	Against vacant post	
04	Rizwana Gul SCT	GGHS, Nar Sardar Maidad Khel	GGHS, Tajori	Against vacant post	
05	Iqbal Begum SCT	GGHS, No.1 Abba Khel	GGHS, No.1 Abba Khel	Against vacant post	
06	Shamun Akhter SCT	GGHS, No.2 Naurang	GGHS, No.1 Naurang	Against vacant post	
07	Akhter Nisa SCT	GGHS, No.1 Lakki	GGHS, Sadar, Khel Abba Khel	Against vacant post	
08	Samina Anjum SCT	GGHS, No.1 Lakki	GGHS, Dallo Khel	Against vacant post	
09	Arifa Andalib SCT	GGHS, No.3 Lakki	GGHS, Dallo Khel	Against vacant post	
10	Aziza Jabeen SCT	GGHS, Nar Sardar Maidad Khel	GGMS, Bakhmat Ahmad zai	Against vacant post	
11	Najma Shaheen SDM	GGHS, Bachkan Ahmad zai	GGMS, Isak Khel	Against vacant post	
12	Hussan Bano AT	GGMS, Chowki Jund	GGHS, Sadar Khel Abba Khel	Against vacant post	
13	Anaela Ambreen TT	GGMS, Chowki Jund	GGMS, Shah Hussan Khel	Against vacant post	
14	Nighat Shuheen S. Qaria	GGHS, Darra Pezu	GGMS, Matora	Against vacant post	

Promotion of CT/SCT, AT/SAT, DM/SDM, TT/STT to the post of SST (Bio, Chem)

S.No.	Name of Teacher	Present post and school	Place of posting as SST (Bio:Chem) B-16	Remarks
01	Nasreen Bibi SCT	GGCMS, No. 2 Lakki	GGHS, Dallo Khel	Against vacant post
02	Majabeen Tabasum AT	GGMS, Mela Shahab Khel	GGHS, Mama Khel Marwat	Against vacant post
03	Ruqia Tabasum TT	GGMS, Mandan Manjuwal	GGHS, No.1 Khiodad Khel	Against vacant post
04	Neelofar Dilawar DM	GGMS, Mela Shahab Khel	GGHS, Sadar Khel Abba Khel	Against vacant post
05	Samina Bibi PST	GGPS, Nar Mohammad Ghazni Khel	GGHS, Naser Khel	Against vacant post

Promotion of PSHT/SPST/PST to the post of SST General

S.No.	Name of Teacher	Present post and school	Place of posting as SST (Gen.) B-16	Remarks
01	Zaibun Nisa PSIIT	GGPS, Pasani Ayaz Khan	GGHS, Kotka Giddar	Against vacant post
02	Syedta Hussan Nisa PSIIT	GGPS, Hamid Abad	GGMS, Kotka Ayaz Khan	Against vacant post
03	Bibi Tahira PSIIT	GGPS, Nar Faqir Masoom	GGMS, Jamil Khan Takhti Khel	Against vacant post

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Promotion of Qaria/SOaria to the post of SST (Math, Phy)

S.No.	Name of Teacher	Present post and school	Place of posting as	Remarks
01	Mehrin Nisa Qaria	GGHS, bachkan Ahmad Zai	SST (Math: Phy) B 16 GGHS, No. 1 Lakki	Against vacant post

TERMS & CONDITIONS"-

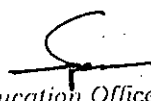
1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct. They shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter Seniority on lower post will remain intact.
6. NO TA/DA is allowed for joining their duty.
7. Entry in this effect should be made in their service books and other office records accordingly.
8. The undersigned will check and verify the certificates/Degrees of the above named candidates from the concerned Board/University before the draw of their pay.
9. They will give an undertaking to be recorded in their Service Books to the effect that if any over payment are made to them in light of this order will be recovered and if they are wrongly promoted they will be reversed.

District Education Officer,
(Female) Lakki Marwat.

Endst: No. 12670-77

Dated 21-12-2017

- Copy to the:-
1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar with reference to his office Endst: No & dated cited above.
 2. Deputy District Education Officer (F) Lakki Marwat.
 3. District Accounts Officer Lakki Marwat.
 4. Sub Divisional Education Officer (F) Lakki Marwat/Serai Nurang
 5. District Monitoring Officer Lakki Marwat.
 6. Principal/Head Mistress of school concerned.
 7. Official concerned.
 8. Master File.


District Education Officer
(Female) Lakki Marwa

C.F.C
R

ATTESTED

Annexure

DFD
Ladli M
Please detail

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

مہنہ - عالی

Annexure
C.1

مؤدبانہ التماس ہے کہ میں مسماہ فریدہ ناز دختر محمد عمر
سکنہ سرمنڈی اعظم سوج کٹی بروت، محلہ تعلیم میں بحیثیت
پی ایس ٹی محلہ خدمات سرانجام دے رہی ہوں۔ حالیہ ڈیپارٹمنٹ
پروموشن برائے (ایس ایس ٹی) (ایس ایو ایکس پی) کے لئے میں ٹیپ میں
یہ تھی۔ لیکن محلے نے میرے ساتھ کھلی نا انصافی کرتے ہوئے میری جگہ
مسماہ صاحبہ کی دختر اسلام جان کو مذکورہ بالا پوسٹ پر پروموشن کیا
ہے۔ جو کہ میری لحاظ سے مجھ سے جوئیئر ہے۔

تقریباً دو ہفتے قبل جب صاحبہ کی کو اسی طریقے سے پروموشن کیا جا رہا تھا
میں نے خلاف میں نے درخواست ڈی۔ ای۔ او صاحبہ کو دی تھی۔ جس پر صاحبہ کی
آئی پروموشن روک دی گئی تھی اور مجھ سے A.C.R اور تقرری نامہ
کی کاپی مانگی گئی۔ جو میں نے بروقت A.S.D. سے صادقہ کو بھیجی تھی
تھی اس کے باوجود مجھے اب کہا جا رہا ہے کہ صاحبہ کو آپ کی جگہ اس
وجہ سے پروموشن کیا گیا۔ کہ آپ کی A.C.R کاپی جاری ہے پاس نہیں تھی
میں دن دیپارٹمنٹ اپنے حق پر ڈاکہ پٹرنے کے خلاف آپ کے پاس
فوری دے کر آئی ہوں۔ اور پراسید ہوں کہ آپ اس حوالے سے فوری
ایکشن لینے ہوئے چکنا چکنا تحقیقات فرمائیں گے اور مجھے اپنا حق دلائیں گے
عین لغزش ہوگی

بتدیخ : ۱۱۶/۱۱۸۱۷

الحاضری! سیدنا
مسماہ فریدہ ناز، محلہ کٹی بروت، داخلی نار محمد نوری تحصیل، پشاور کی طرف
موبائل نمبر 0341-9426066

D/No : 1750
Dtd : 30/12/17

ATTESTED

بعدالت

100 Pak Service Tribe
Peshawar

سرپرست ناز
2 منجانب
بنام

مورد
مقدمہ
دعوی
جرم

الحمد للہ
وہ مبارک

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام پیش کردہ کیلئے سعید فہمان علی جباری، خطی سعید
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر اس پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا نظر نہ یا اپیل کی برادگی
اور منسوخی نیز دائر کرنے، اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار 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 بااختیارات حاصل ہوں گے۔
اور اس کا ساختہ پرداخت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائز التوائے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

Syed Noman Ali Bukhari
Advocate
Attested

Accepted

20

ماہ

المرقوم

العہد گواہ العہد

کے لئے منظور ہے۔

مقام

مقرر شدہ

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

S.A.No. 509/2018

Farida Naaz

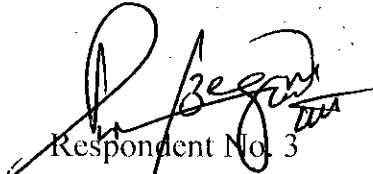

Versus

Govt: of KPK and others

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Through


Respondent No. 3
District Education Officer
(Female) Lakki Marwat


Dated. _____ / _____ /2018.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

S.A.No. 509/2018

Farida Naaz

petitioner

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA

WRITTEN REPLY FOR AND ON BEHALF OF RESPONDENTS

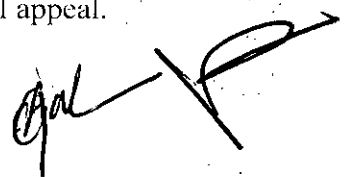
RESPECTFULLY SHEWEATH:

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 petitioner with mala-fide intent.
- D. The appellant has no locus-standi and cause of action as he has lost all his remedies in this respect.
- E. The Honourable Tribunal must take cognizance of the fact that the appellant is filing repeated appeals before the Honourable Tribunal which under the law is not allowed.

REPLY ON FACTS:

1. Para No. 1 is correct and the appellant was appointed as PST at Union Council Marmandi Azim.
2. Para No. 2 is correct as mentioned in appeal.
3. Para No. 3 is incorrect, the ASDEO was directed to submit seniority list who were fit for promotion, and which was correctly sent to the departmental promotion committee which is attached herewith (Annexure-A).
4. That the Para No. 4 is replied as, that the ASDEO (F) correctly provided list of the name of the respondent NO. 6 to Departmental committee because she was fit for promotion. No facts were ignored by the DEO (F) nor any law or policy was overruled.
5. That the respondent have no record concerning the said departmental appeal.

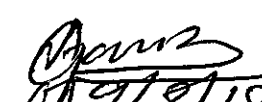



REPLY ON GROUNDS:-

- A. Para I of the grounds are incorrect, wrong the respondents have no record of the departmental appeal, so question of injustice does not arise.
- B. That the promotion of the respondent No. 6 is not harsh and no discrimination to the appellant was made, the appellant is ACR was not available to the respondents, so the respondent No. 6 was promoted.
- C. That the promotion of the respondent No. 6 is not against the law and appellant rights was not dismissed by the respondents.
- D. That nor the appellant was ignored from the promotion neither any fact or record is overlooked.
- E. That the appellant was never omitted from promotion, nor her any right was rejected.
- F. That the mentioned judgment of Honourable court is correct but the case of the appellant was a different type. The ACR was not available with the department so the respondent No. 6 was preferred to the departmental committee.
- G. That there is no any order regarding promotion of the appellant, but there was no ACR of the appellant with the department, so the respondent No. 6 was correctly promoted.
- H. That the appellant was treated in accordance with law and no discrimination was made to the appellant.
- I. That there is no record of the said departmental appeal, so there is no question of ignoring the application.
- J. That the name of the appellant was not preferred to the departmental committee so the appellant can not be provided personal hearing.
- K. That the appellant was not penalized because the promotion of the respondent No. 6 is in accordance with law.
- L. Para No. L mare not relevant hence need no reply.

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

Dated: _____ / _____ /2018

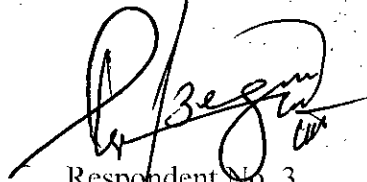


9/8/18
District Edu. Officer
(Male) Lakki Marwat


Respondent No. 5
District Education Officer
(Female) Lakki Marwat

AFFIDAVIT

I Mst: Parveen Begum District Education Officer (F) Lakki Marwat, solemnly affirm and declare on oath that the contents of instant reply/comments are correct to the best of my knowledge and belief. Nothing has been concealed from this Honourable High Court.

Dated. _____


Respondent No. 3
District Education Officer
(Female) Lakki Marwat


**WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF
PSHT/SPST/PST TO SST B-16 SC: Bio/Chem**

Total No of vacant SST SC/Bio/Chem Posts =01

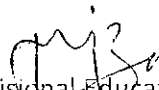
Method of recruitment		Total post
25% initial recruitment		
75% by promotion	20% by promotion from PSHT/SPST/PST	
	NET TO BE PROMOTED	
	Proposed for promotion	

LIST OF PSHT/SPST/PST (MALE) FOR THE PROMOTION TO SST SC Bio/Chem

S. No	S. L. No	Name of Official & Present place of posting	DOB	Date of Appointment as Regular PST	Qualification	Whether eligible for up gradation	Remarks
01	618	SAIMA BIBI, PST GGPS NAR MUHAMMAD GHAZNI KHEL	01/10/1988	15-05-2009	B.Sc (Che:)/B.ED	Yes but B.Sc/B.Ed entry not made in service book	
02							

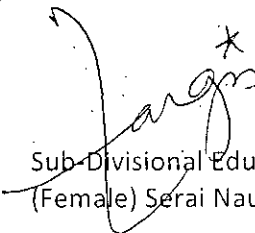
CERTIFICATE:-

1. It is certified that all the PSHT/SPST/PST (Male) included in the panel for the promotion of SST SC: Bio/Chem post.
 - a) Hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.
 - b) Have completed the required minimum length of qualifying service and qualifications as required for promotion to the post of SST under the rules.
 - c) None of them is on deputation to any organization under the federal/provincial/autonomous/semi-autonomous/international organizations.
 - d) Neither any disciplinary/departmental proceedings/anti-corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
 - e) No one is on long leave/Ex-Pakistan Leave.
 - f) Their ACRs, Synopsis are free from adverse remarks.
 - g) They are all alive and serving.
 - h) Their appointment orders against PST posts are attached herewith.
 - i) Their seniority list of B-15 officers is final, undisputed and not subjudice.
2. The Departmental promotion committee is requested to determine the suitability of the above PSHT/SPST/PST for promotion to SST B-16 SC: Bio/Chem post with immediate effect.


Sub-Divisional Education Officer
(Female) Lakki Marwat

Counter signed

District Education Officer
(Female) Lakki Marwat


Sub-Divisional Education Officer
(Female) Serai Naurang

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

S.A.No. 509/2018

Farida Naaz

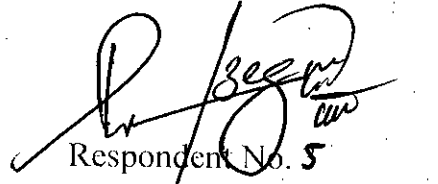

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Through


Respondent No. 5
District Education Officer
(Female) Lakki Marwat


Dated. ____ / ____ /2018:

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

S.A.No. 509/2018

Farida Naaz

petitioner

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA

WRITTEN REPLY FOR AND ON BEHALF OF RESPONDENTS

RESPECTFULLY SHEWEATH:

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 petitioner with mala-fide intent.
- D. The appellant has no locus-standi and cause of action as he has lost all his remedies in this respect.
- E. The Honourable Tribunal must take cognizance of the fact that the appellant is filing repeated appeals before the Honourable Tribunal which under the law is not allowed.

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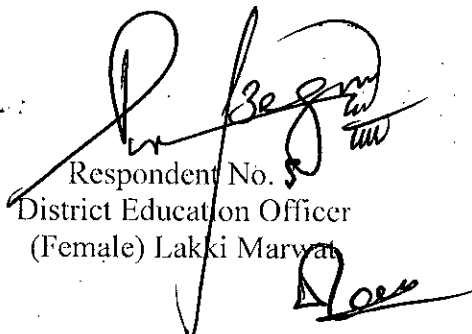
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5. That the respondent have no record concerning the said departmental appeal.

REPLY ON GROUNDS:-

- A. Para I of the grounds are incorrect, wrong the respondents have no record of the departmental appeal, so question of injustice does not arise.
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- E. That the appellant was never omitted from promotion, nor her any right was rejected.
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- G. That there is no any order regarding promotion of the appellant, but there was no ACR of the appellant with the department, so the respondent No. 6 was correctly promoted.
- H. That the appellant was treated in accordance with law and no discrimination was made to the appellant.
- I. That there is no record of the said departmental appeal, so there is no question of ignoring the application.
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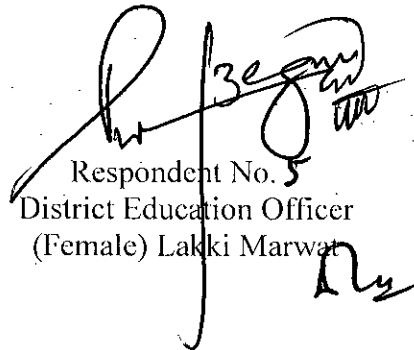

Dated: _____ / _____ /2018


Respondent No. 5
District Education Officer
(Female) Lakki Marwat

AFFIDAVIT

I Mst: Parveen Begum District Education Officer (F) Lakki Marwat, solemnly affirm and declare on oath that the contents of instant reply/comments are correct to the best of my knowledge and belief. Nothing has been concealed from this Honourable High Court.

Dated. _____


Respondent No. 5
District Education Officer
(Female) Lakki Marwat


WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF

PSHT/SPST/PST TO SST B-16 SC: Bio/Chem

Total No of vacant SST SC/Bio/Chem Posts

=01

Method of recruitment	Total post
25% initial recruitment	
75% by promotion	20% by promotion from PSHT/SPST/PST
	MET TO BE PROMOTED
	Proposed for promotion

LIST OF PSHT/SPST/PST (MALE) FOR THE PROMOTION TO SST SC Bio/Chem

S. No	S. L. No	Name of Official & Present place of posting	DOB	Date of Appointment as Regular PST	Qualification	Whether eligible for up gradation	Remarks
01	513	SAIMA BIBI, PST GGPS NAR MUHAMMAD GHAZNI KHEL	01/10/1988	15-05-2009	B.Sc (Che:)/B.ED	Yes but B.Sc/B.Ed entry not made in service book	
02							

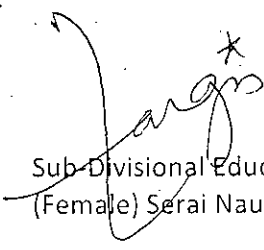
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 - g) They are all alive and serving.
 - h) Their appointment orders against PST posts are attached herewith.
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2. The Departmental promotion committee is requested to determine the suitability of the above PSHT/SPST/PST for promotion to SST B-16 SC: Bio/Chem post with immediate effect.


Sub-Divisional Education Officer
(Female) Lakki Marwat

Counter signed

District Education Officer
(Female) Lakki Marwat


Sub-Divisional Education Officer
(Female) Serai Naurang

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF

PSHT/SPST/PST TO SST B-16 SC: Bio/Chem

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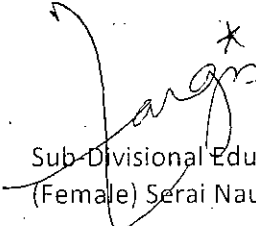
S. No	S. L. No	Name of Official & Present place of posting	DOB	Date of Appointment as Regular PST	Qualification	Whether eligible for up gradation	Remarks
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Sub-Divisional Education Officer
(Female) Lakki Marwat

Counter signed


Sub-Divisional Education Officer
(Female) Serai Naurang

District Education Officer
(Female) Lakki Marwat

یعدالت جناب سرسٹریٹ جیول صوبہ سندھ پشاور

مخاتب امدانٹ
نمبر ۶ تار
دعوی اپیل

باعضرت محترمہ ایٹک

مستندہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور
کیسٹ اسعد امدان خان سرور سے ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب
موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے با رضی نامہ و تقریر ثالث و فیصلہ بر عطف
دینے جواب دہی اور اقبال دعوی اور لہذا وٹگری کرنے اجراء اور وصولی چیک و روپیہ اور عری دعوی اور درخواست
ہر قسم کی تجدید اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کیسٹ فیہ اپیل کی برآمدگی
اور سب سے پیشہ داری کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
کے کل یا اجزائی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقریر کا اختیار ہوگا
اور صاحب مقدمہ شاہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور
قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب
موصوف ہوں گے نیز بقایا دخر چہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام رورہ
پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔
لہذا وکالت نامہ رکھ دیا کہ سند ہے۔

المقرؤم
۱۶/۲/۵۱
العبد
العبد
العبد

سیدہ سہیلہ
سیدہ اللہ خان مرہوت
ایڈووکیٹ
ارباب سید امدان
ایڈووکیٹ

من روپیہ تار
ایڈووکیٹ

Saima Bibi
R. No. 6

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S. A. No. 509 / 2018

Farida Naz

versus

Govt. of KP & Others

**WRITTEN STATEMENT ON BEHALF OF
RESPONDENT NO. 06 (SAIMA BIBI):****Respectfully Sheweth:****Preliminary Objection:-**

1. That the post of SST is of provincial cadre and not based on union council.
2. That the appeal of appellant is hopelessly time barred as order of promotion of R. No. 6 was made on 21-12-2017 while the appeal in hand was filed in the year 2018.
3. That appellant filed WP No. 92-B/2018 which was dismissed on 6-02-2018.
4. That appellant was required to seek permission from the hon'ble court to approach before the proper forum which lacks in the case in hand.
5. That the appeal of appellant hits by principle of estoppel. And is not maintainable at all in the present forum.

ON FACTS:-

1. Needs no comments.
2. As above.
3. Para No. 3 does not pertain to R. No. 6 but as stated above the post of senior school teacher B-16. Bio, Chemistry is a provincial level which was to be filled in after getting approval of R. No. 2.

4. Needs no comments, however, R. No. 6 was fulfilling criteria of eligibility and fitness, so order of promotion to the post of senior school teacher B-16 was issued.
5. Para No. 5 of the appeal does not belong to R. No. 06, yet appellant was legally required to not file Writ petition before Peshawar High Court Peshawar Bannu Bench but to approach before the proper forum.

No permission was given to appellant by the High Court to approach before proper forum but her appeal was dismissed in limine. She was legally bound to file CPLA before the apex court to seek permission to approach before the proper forum.

GROUND:-

- A. Not correct. Order dated 21-12-2017 was per the mandate of law and R. No. 6 was not promoted at the post of appellant.
- B. Not correct. No discrimination was meted out to appellant in the matter.
- C. Not correct. The promotion of R. No. 6 was not at the cast of appellant but was as per the mandate of law. And if she is aggrieved of the impugned order, then she shall sue department for damages.
- D. Does not pertain to R. No. 6. More so, the promotion was not on the basis on union council concerned.
- E. Needs no comments as the para does not belong to R. No. 6.
- F. In response to ground "F" of the appeal it is submitted that posting transfer promotion and appointment gives no where vested right to anyone.
- G. Needs no comments, however R. No. 6 was not promoted at the cast of appellant to the post of SST.
- H. Not correct. Appellant was not discriminated in any manner in the matter. Near seniority does not give any vested right to promotion.

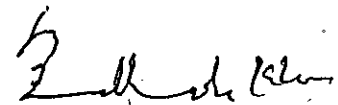
- I. Needs no comments, yet appellant choosed wrong forum prior to the appeal in hand before the hon'ble high court.
- J. Does not belong to R. No. 6, yet appellant was heard in person as is evident from the record.
- K. Needs no comments on the half of R. No. 6.
- L. Allowed on the half of R. No. 6.
- M. Needs no comments.
- N. As above in ground "L".

It is, therefore, most humbly requested that the appeal of appellant, being devoid of merit, without substance, time barred and not per the mandate of Law, be dismissed with cost.



R. No. 6

Through



Saadullah Khan Marwat



Amjad Khan
Advocates

Dated 24-04-2019

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S. A. No. 509 / 2018

Farida Naz

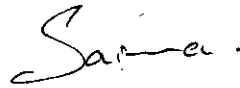
versus

Govt. of KP & Others

COUNTER AFFIDAVIT

I, Miss Saima Bibi, D/O Islam Jan Senior School Teacher Govt. Girls High School, Nasar Khel, Lakki Marwat, do hereby solemnly affirm and declare that contents of the **written statement** are true and correct to the best of my knowledge and belief while that of appeal of appellant are illegal and incorrect.

I reaffirm the same on oath once again to be true and correct as per the available record.



DEPONENT