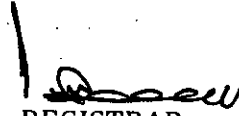




Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 575/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26/04/2018	<p>The appeal of Mst. Nusrat Jabeen presented today by Qazi Zaki-ud-Din 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 26/4/18</p>
2-	15/05/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>22/05/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	22.05.2018	<p>None present on behalf of the appellant. Adjourned. To come up for preliminary hearing on 17.07.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member</p>

Appeal No. 575/2018
Nusrat Jabeen vs Govt

02.07.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that vide order dated 05.01.2018, she was transferred from GGHS Azakhel Nowshera to SDEO(F) Takht Bhai, Mardan. She resumed the charge on 06.01.2018 and started performing duty. That vide impugned order dated 30.03.2018 she was transferred from Takht Bhai to Katlang Mardan against the vacant post of SDEO (F). Feeling aggrieved she filed departmental appeal on 02.04.2018, which was rejected on 11.04.2018. Thereafter the appellant filed writ petition no. 2223-P/18 dated 10.05.2018 in which the Peshawar High Court suspended the operation of the aforementioned impugned order. Subsequently, on 10.05.2018, learned counsel for the appellant withdrew the writ petition from Peshawar High Court and filed the service appeal in hand in this Tribunal. The appellant has not been treated according to law and rules. A separate application for suspending the impugned order dated 30.03.2018 has also been submitted.

Points urged need consideration. Admit, subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 17.07.2018 before S.B. Till date the operation of the impugned order dated 30.03.2018 is suspended.


(AHMAD HASSAN)
MEMBER

17.07.2018

Learned counsel for the appellant present. Mr. Sardar Shaukat Hayat learned Additional Advocate General alongwith representative for official respondents present. Private respondent No. 3 in person present. Respondent party seeks time to furnish reply. In the present appeal posting/transfer has been made impugned. The operation of the impugned order has been suspended, hence to avoid further delay in the disposal of present service appeal, to come before D.B on 01.08.2018 for further proceedings. The respondents are directed to furnish reply on or before the date fixed.



Member

Appellant Deposited
Security & Process Fee

Service Appeal No. 575/2018

01.08.2018

Appellant absent. Learned counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Hameed-ur-Rehman, AD (Litigation) for official respondents No. 1 & 2 present. Private respondent No. 3 with her counsel Miss. Uzma Advocate also present and submitted written reply. Representative of official respondents No. 1 & 2 seeks adjournment to furnish written reply. Adjourned. To come up for written reply/comments on behalf of official respondents No. 1 & 2 and further proceedings before D.B on 20.08.2018.


(Ahmad Hassan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)

20.08.2018

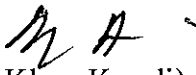
Counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Hameed Ur Rehman AD litigation for the official respondent present. Written reply submitted on behalf of official respondents No.1, & 2. To come up for *rejoinder* arguments on 05.09.2018 before D.B.



(Muhammad Hamid Mughal)
Member


(Muhammad Amin Kundi)
Member

05.09.2018


Appellant in person present. Mr. Muhammad Jan, Deputy District Attorney for official respondents No. 1 & 2 and private respondent No. 3 with her counsel present. However, junior counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 10.09.2018 before D.B.

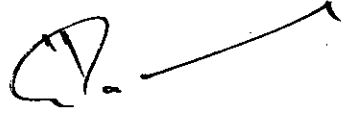

(M. Amin Khan Kundi)
Member


(M. Hamid Mughal)
Member

10.09.2018

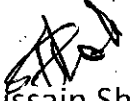
Appellant in person and Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Learned counsel for private respondent No.3 also present. Learned counsel for the appellant is not available. In the present case transfer order has been made impugned and interim relief has been issued however due to none availability of learned counsel for the appellant further proceedings in the present case could not proceeded. Hence adjourned at the cost of Rs.2000/- to be paid by the appellant to the private respondent. To come up for arguments on 24.09.2018 before D.B


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

24.09.2018

Appellant absent. Learned counsel for appellant absent. Mr. Muhammad Jan learned Deputy District Attorney for official respondents, Private respondent No.3 alongwith counsel present. Case called for several times but no one appeared on behalf of appellant. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

ANNOUNCED.
24.09.2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 575/2018

Date of Institution ... 26.04.2018

Date of Decision ... 03.12.2018

Nusrat Jabeen (BPS-17) SDEO (F) Takht Bhai, District Mardan, R/o House No. 8,
Lalazar Colony, University of Peshawar. ... (Appellant)

VERSUS

1. The Govt: of Khyber Pakhtunkhwa through its Secretary Elementary and
Secondary Education, Peshawar and two others. ... (Respondents)

MR. QAZI ZAKI UD DIN,
Advocate

--- For appellant.

MISS. UZMA SYED
Advocate

--- For respondent no.3

MR. MUHAMMAD JAN,
Deputy District Attorney

--- For official respondents.

MR. AHMAD HASSAN,
MR. MUHAMMAD AMIN KHAN KUNDI

--- MEMBER(Executive)

--- MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for the
parties heard and record perused.

FACTS

2. The appellant is aggrieved of impugned order dated 30.03.2018, transferring her
from Takht Bhai to Katlang Mardan against the vacant post of SDEO (F). Feeling
aggrieved she filed departmental appeal on 02.04.2018, which was rejected on
11.04.2018. Thereafter the appellant filed writ petition no. 2223-P/2018 dated 10.05.2018
which was subsequently withdrawn, hence, the instant service appeal.

ARGUMENTS

3. Learned counsel for the appellant argued that vide order dated 05.01.2018, she
was transferred from Govt: Girls Higher Secondary School, Mohib Banda, Nowshera to

the post of SDEO(F) (BPS-17) Takht Bhai. That vide order dated 30.03.2018 she was prematurely transferred as SDEO(F) Katlang, Mardan. Premature transfer is violation of laid down rules/policy. The appellant had not completed normal at the place of her previous posting.

4. On the other hand learned Deputy District Attorney argued that appellant belonged to Teaching Cadre and was not otherwise eligible for transfer against the Management Cadre post. Both Takht Bhai and Katlang fall in the domain of DEO(F) Mardan. Under Section-10 of the Khyber Pakhtunkhwa Civil Servant Act 1973, a civil servant is liable to serve anywhere in the province and cannot claim a posting of his/her choice.

5. Learned counsel for private respondent no.3 relied on the arguments advanced by the learned Deputy District Attorney.

CONCLUSION

6. The appellant belongs to the teaching cadre and was serving as S.S (BPS-17) at Govt: Girls Higher Secondary School, Azakhel Nowshera. Vide order dated 05.01.2018 she was posed as SDEO (F) Takht Bhai against a vacant post. In the first instance being an employee of Teaching Cadre, she should not have been deputed against a Management Cadre post. In these circumstances the elements of political influence/maneuvering in getting posting of her choice could not be ruled out. That through order dated 30.03.2018, she was posted as SDEO(F) Katlang Mardan. It may not be out of place to mention here that the appellant belonged to District Peshawar, so one failed to understand, why she opted for a posting in Takht Bhai in the first instance. Moreover, both Takht Bhai and Katlang fall under the administrative control of DEO(F) Mardan. During the course of the arguments learned counsel for the appellant failed to establish malafide, if any, on the part of the respondents with regard to order dated 30.03.2018. Private respondent no.3 transferred to Takht Bhai had almost completed tenure at the

previous posting. Transfer on a particular station of choice is not a vested right/prerogative of a civil servant.

7. As a sequel to above, the appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



(AHMAD HASSAN)
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

ANNOUNCED
03.12.2018

Form-A

FORM OF ORDER SHEET

Court of _____

Appeal's Restoration Application No. 295/2018

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	24.09.2018	<p>The application for restoration of appeal no. 575/2018 submitted by Mr. Salim Raza Safi Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR - 24/9/18</p>
2		<p>This restoration application is entrusted to D. Bench to be put up there on <u>28-9-2018</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
	28.09.2018	<p>Petitioner in person present. Notice be given to the respondents. To come up for reply/arguments on restoration application on 05.10.2018 before S.B. <i>Notice</i> <i>stay application be given to the respondents</i></p> <p style="text-align: right;"><i>[Signature]</i> Chairman</p>

05.10.2018

Counsel for the appellant Nusrat Jabeen present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Arguments on restoration application heard. Record reveals that the main appeal was dismissed in default on 24.09.2018 and restoration application was filed on the same day therefore, the same is well within time. The restoration application is accepted and the appeal is restored to its old number. To come up for arguments on 29.10.2018 before D.B. The restraint order already issued in favour of the appellant is also restored. Notice be also issued to the respondents accordingly.


(Muhammad Amin Khan Kundi)
Member

22.10.2018

Neither appellant nor her counsel present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Due to retirement of Hon'ble Chairman, the Tribunal is incomplete. To come up for same as before on 06.11.2018.


Reader

06.11.2018

Due to retirement of Hon'able Chairman, the Tribunal is defunct. Therefore, the case is adjourned for the same on ~~20.11~~ 2018 before D.B.


Reader

20.11.2018

Learned counsel for the appellant Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the private respondent also present. Learned counsel for the appellant submitted rejoinder, placed on file. Learned counsel for the appellant requested for adjournment for arguments, upon which learned counsel for the private respondent showed reservation. Last opportunity is granted. In case present appeal is not argued on behalf of the appellant on the next date, ad-interim relief/restraint order issued in the present service appeal, shall be treated as vacated. To come up for arguments on 03.12.2018 before D.B.


Member


Member

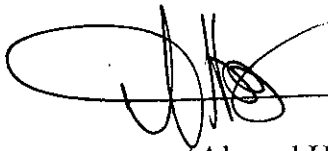
Order


03.12.2018

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney for official respondents no. 1 and 2 and private respondent no.3 alongwith her counsel present. Arguments heard and record perused.

Vide detailed judgment of today of this Tribunal placed on file, the appeal is dismissed. Parties are left to bear their own cost. File be consigned to the record room.

Announced:
03.12.2018


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. 575/2018

Nusrat Jabeen.....(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through its Secretary
Education and others.....(Respondents)


I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Addresses of the parties		8
4.	Application with affidavit		9-11
5.	Copy of transfer order dated 05/01/2018	A	12-15
6.	Copy of the charge report	B	16
7.	Copy of the order dated 30/03/2018	C	17-18
8.	Copies of order dated 11/04/2018 of respondent No. 1 and ground of review petition/ representation/ appeal	D & E	19-20
9.	Wakalat Nama		21

Applicant/ Appellant

Through

Dated: 26/04/2018


Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.
Cell No. 0331-8234060

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 575 /2018

Diary No. 623

Dated 26-4-2018

Nusrat Jabeen (BS-17) SDEO (F) Takht Bhai, District Mardan
R/o House No. 8, Lalazar Colony, University of
Peshawar.....(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through its Secretary Elementary and Secondary Education, Peshawar.
2. Director Elementary and Secondary Education, G.T. Road, Hashtnagri, Peshawar.
3. Rukhsana Rahim (BS-17) SDEO (F) Topi Swabi..(Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974, AGAINST THE ORDER DATED
11/04/2018 OF RESPONDENT NO. 1 THE
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION
DEPARTMENT, PESHAWAR THROUGH ITS
SECRETARY BY VIRTUE OF WHICH REVIEW/
REPRESENTATION/ APPEAL AGAINST THE
ORDER OF TRANSFER OF THE APPELLANT
DATED 30/03/2018 WAS REJECTED.**

Filed to-day
Registrar
26/4/18

Prayer:

*This Hon'ble Tribunal may be please to accepted
this appeal, the impugned order of transfer of the*

→ 2 ←

appellant dated 30/03/2018 and the order of respondent No. 1 dated 11/04/2018 may be set aside and appellant may be retained against the post of SDEO (F) BS-17 Takht Bhai with cost throughout.

Respectfully Sheweth:

- A. That the addresses of the parties given in the heading of this appeal will be sufficient for summoning the parties for appearance before this Hon'ble Tribunal.
- B. The brief facts given rise to this appeal are:
1. That the appellant is the employee of Education Department in BS-17 presently posted as SDEO (F) BS-17 Takht Bhai Mardan while the appellant is the resident of Peshawar.
 2. That by virtue of an order of transfer dated 05/01/2018 the appellant was transferred from Government Girls Higher Secondary School Mohib Banda, Nowshera to vacant post of SDEO (F) BS-17

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Takht Bhai Mardan. (Copy of transfer order dated 05/01/2018 is attached as annexure "A").

3. That the appellant took over charge of the post from 08/01/2018. (Copy of the charge report is attached as annexure "B").
4. That no sooner did the appellant remain at Takht Bhai as SDEO (F) for about three months then the respondent No. 1 passed an order dated 30/03/2018 by virtue of which the appellant was transferred and posted as SDEO (F) Katlang Mardan, which is too far away a place, which can also be considered hard area. (Copy of the order dated 30/03/2018 is attached as annexure "C").
5. That feeling aggrieved of the impugned order of transfer of the appellant, the appellant preferred under the rules a review petition/ representation/ appeal before respondent No. 1, but respondent No. 1 passed an order dated 11/04/2018 by virtue of which review petition/ representation/ appeal of the appellant was dismissed. (Copy of order dated 11/04/2018 of respondent No. 1 is attached as

J S A

annexure "D" while ground of review petition/
representation/ appeal is attached as annexure
"E").

6. That feeling aggrieved of the impugned order of the respondent No. 1, the appellant has, now, come to this Hon'ble Tribunal in this Service Appeal on the following grounds, inter-alia:

GROUND:

- A. That the impugned order of the transfer of appellant is against law, facts and procedure and as such is not tenable.
- B. That the appellant, who is the resident of Peshawar was posted as SS at Government Girls Higher Secondary School, Mohib Banda, District Nowshera wherefrom she was transferred and posted against the vacant post of SDEO (F) BS-17 Takht Bhai, Mardan.
- C. That the appellant hardly remained at Takht Bhai for three months when respondent No. 1 passed

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another transfer order by virtue of which the appellant was transferred from Takht Bhai to Katlang.


- D. That the appellant has not yet completed the requisite tenure provided by the rules as such the impugned order is against the rules and is liable to be set aside on this score alone.
- E. That the impugned order making transfer of the appellant to Katlang is also creating problems for the appellant, because the appellant comes for duties from Peshawar which is too distant a place and is not convenient for the appellant.
- F. That it is the policy of the Government to post an employee at a nearest station, but contrary to the rules and policy the appellant has been transferred to a very faraway place and being a female it is not possible for the appellant to go to Katlang from Peshawar.

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G. That Takht Bhai is convenient for the appellant, because Takht Bhai is situated on the main Road where the appellant easily comes for duty.

H. That it will be in the interest of justice if, keeping in view the circumstances of the case, the impugned orders are set aside and the appellant is retained at Takht Bhai.

It is, therefore, respectfully prayed that this Hon'ble Tribunal may be please to accepted this appeal, the impugned order of transfer of the appellant dated 30/03/2018 and the order of respondent No. 1 dated 11/04/2018 may be set aside and appellant may be retained against the post of SDEO (F) BS-17 Takht Bhai with cost throughout.


Appellant

Through


Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.

Dated: 26/04/2018

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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2018

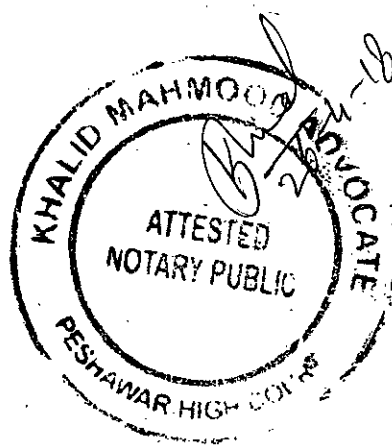
Nusrat Jabeen.....(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through its Secretary Education and others.....(Respondents)

AFFIDAVIT

I, Nusrat Jabeen (BS-17) SDEO (F) Takht Bhai, District Mardan R/o House No. 8, Lalazar Colony, University of Peshawar, do hereby solemnly affirm and declare on oath, that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Nusrat Jabeen
DEPONENT
CNIC: 17301-9081188-0

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. _____/2018

Nusrat Jabeen.....(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through its Secretary
Education and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Nusrat Jabeen (BS-17) SDEO (F) Takht Bhai, District Mardan
R/o House No. 8, Lalazar Colony, University of Peshawar.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through its Secretary
Elementary and Secondary Education, Peshawar.
2. Director Elementary and Secondary Education, G.T. Road,
Hashtnagri, Peshawar.
3. Rukhsana Rahim (BS-17) SDEO (F) Topi Swabi.

Nusrat Jabeen
Appellant

Through

Dated: 26/04/2018

Qazi Zaki ud Din
Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M. No. _____/2018

In

Service Appeal No. _____/2018

Nusrat Jabeen.....(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through its Secretary
Education and others.....(Respondents)

**APPLICATION FOR THE GRANT OF AD-
INTERIM RELIEF BY STAYING AND
SUSPENDING THE OPERATION OF THE
IMPUGNED ORDER OF TRANSFER OF THE
APPELLANT DATED 30/03/2018 AND THE
ORDER OF RESPONDENT NO. 1 PASSED IN
REVIEW DATED 11/04/2018, TILL FINAL
CONCLUSION OF THE MAIN SERVICE APPEAL.**

Respectfully Sheweth:

1. That the applicant has filed the attached appeal in this Hon'ble Tribunal which may be considered the part and parcel of this application.
2. That the applicant requests this Hon'ble Tribunal for the grant of ad-interim relief by staying and suspending the above mentioned imputed orders till final conclusion of the attached appeal on the following grounds amongst other:

GROUND:


1. That a prima facie case is there in favour of the applicant about which the applicant is quite hopeful to succeed.
2. That if ad-interim relief is not granted, the respondent No. 3 will take charge from the applicant and the applicant will suffer irreparable loss.
3. That balance of convenience also lies in favour of the applicant.

It is, therefore, respectfully prayed that, ad-interim relief by suspending the operation of the impugned order as is mentioned in the body and heading of this application may kindly be granted in favour of the application and against the respondents.

Applicant/ Appellant

Through

Dated: 26/04/2018


Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.

1/1

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M. No. _____/2018

In

Service Appeal No. _____/2018

Nusrat Jabeen.....(Appellant)

VERSUS

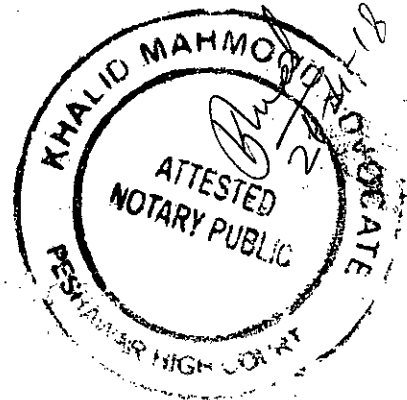
Government of Khyber Pakhtunkhwa through its Secretary
Education and others.....(Respondents)

AFFIDAVIT

I, Nusrat Jabeen (BS-17) SDEO (F) Takht Bhai, District Mardan R/o House No. 8, Lalazar Colony, University of Peshawar, do hereby solemnly affirm and declare on oath, that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Nusrat Jabeen

DEPONENT
CNIC: 17301-9081188-0





Annexure A

(12)

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

Dated Peshawar the January 5th, 2018

NOTIFICATION

NO. SO(S/F)E&SED/4-16/2018/Placement Committee: Consequent upon the recommendations of Placement Committee, posting/ transfer in respect of following female officers from management/ teaching cadre in the Elementary & Secondary Education Department are hereby ordered against the posts noted against each in the interest of public service with immediate effect:

S#	Name & Address	To be Posted as	Remarks
1	Mst. Sofia Tabassum (BS-18) Dy: DEO (F) Charsadda (Management Cadre)	DDEO (F) BS-18 Peshawar with additional charge of DEO (F) Peshawar	Vice Sr. No. 3
2	Mst. Naghmana Sardar (BS-18) Dy: DEO (F) Swabi (Management Cadre)	DDEO (F) BS-18 Charsadda with additional charge of DEO (F) Charsadda	Vice Sr. No. 1
3	Mst. Ulfat Begum (BS-18) Dy: DEO (F) Peshawar (Management Cadre)	DDEO (F) BS-18 Swabi with additional charge of DEO (F) Swabi	Vice Sr. No. 2
4	Mst. Saadia Ilyas, Dy: DEO (F) Bunner (Teaching Cadre)	DDEO (F) Malakand with additional charge of DEO (F) Malakand	Vice Sr. No. 10 The charge of DEO (F) Bunner assigned to DEO (M) Bunner
5	Mst. Nusrat Begum (BS-18) DEO (F) Dir Lower (Teaching Cadre)	Services placed at the disposal of Directorate of E&SE	The charge of DEO (F) Dir Lower assigned to DEO (M) Dir Lower
6	Mr. Shabir Hussain Shah (BS-18) DEO (Female) Kohistan (Teaching Cadre)	Services placed at the disposal of Directorate of E&SE	The charge of DEO (F) Kohistan assigned to DEO (M) Kohistan

Attested

[Signature]

[Signature]

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Sr.	Name & Address	To be Posted as	Remarks
7	Mst. Rehana Yasmin (BS-18) DDEO (F) Mansehra (Management Cadre)	DDEO (F) BS-18 Battagram with additional charge of DEO (F) Battagram	Vice Sr. No. 8
8	Mst. Zubaida Haneef (BS-18) DDEO (F) Battagram (Management Cadre)	DDEO (F) BS-18 Mansehra with additional charge of DEO (F) Mansehra	Vice Sr. No. 7
9	Mst. Zuhra Begum (BS-18) Dy. Directress Directorate of E&SE (Management Cadre)	Principal (BS-19) GGHSS Kalu Khan Swabi	A.V.P (in her own pay & scale)
10	Mst. Dilshad Begum (BS-18) DDEO (Female) Malakand (Management Cadre)	Dy. Directress (BS-18) Directorate of E&SE	Vice Sr. No. 9
11	Mst. Tahira Jabeen (BS-18) Principal GGHS Kholian Bala (Teaching Cadre)	DDEO (F) BS-18 Abbottabad	A.V.P
12	Mst. Rafia Naz Jadoon, SS (BS-17) GGHS Richbin Abbottabad (Teaching Cadre)	DDEO (F) BS-18 Haripur	A.V.P (in her own pay & scale)
13	Mst. Sabana Yusrat, SS (H/Civics) BS-18 GGHS Begum Shahabuddin Peshawar (Teaching Cadre)	DDEO (F) BS-18 Peshawar	A.V.P
14	Mr. Abdur Rehman, HM (BS-17) GHS Para Gari Kohistan (Teaching Cadre)	DDEO (Female) BS-18 Kohistan	A.V.P (in his own pay & scale)
15	Mst. Rana Atta Ullah, HM (BS-17) GGHS Ali Rustam Mardan (Teaching Cadre)	SDEO (Female) BS-17 Mardan	A.V.P
16	Mst. Nusrat Jabeen, SS (BS-17) GGHS Azakhel Nowshera (Teaching Cadre)	SDEO (Female) BS-17 Takhtbhai Mardan	A.V.P
17	Mst. Ruqia (BS-16) ASDEO (F) Khwazakhela working as SDEO (F) Khwazakhela (Teaching Cadre)	SDEO (F) BS-17 Behrin	A.V.P (in her own pay & scale)

(Signature)

Attested

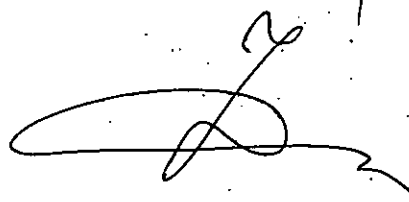
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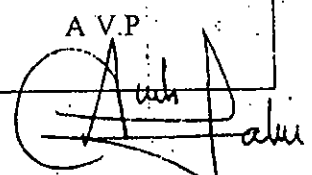
S#	Name & Address	To be Posted as	Remarks
18	Mst. Zakia Bibi (BS-16) ASDEO (F) Charbagh (Management Cadre)	SDEO (F) BS-17 Khwazakhela	Vice Sr. No. 17 (in her own pay & scale)
19	Mst. Bibi Aisha (BS-16) ASDEO (F) Shahpur (Management Cadre)	SDEO (F) BS-17 Alpuri Shangla	A.V.P (in her own pay & scale)
20	Mst. Fozia Sultana, HM (BS-17) working as SDEO (F) Jehangira Nowshera (Teaching Cadre)	HM (BS-17) GGHS Hisar Tang Nowshera	A.V.P
21	Syeda Nasra Azam (BS-16) ASDEO (F) Khairabad (Management Cadre)	SDEO (F) BS-17 Jehangira Nowshera	Vice Sr. No. 20 (in her own pay & scale)
22	Mr. Sher Bahader, SS (BS-17) GHSS Sherpur Mansehra (Teaching Cadre)	SDEO (F) BS-17 Toorgher	A.V.P
23	Mst. Farhat Sultana, HM (BS-17) GGHS Reerh Mansehra (Teaching Cadre)	SDEO (F) BS-17 Balakot Mansehra	A.V.P
24	Mst. Nilofer Sakhawat (BS-16) ASDEO (F) Butial Circle Shangla (Teaching Cadre)	SDEO (F) BS-17 Besham	A.V.P (in her own pay & scale)
25	Mst. Waheeda Khan, SS (English) BS-17 services placed at the disposal of Directorate of E&SE (Teaching Cadre)	SDEO (F) BS-17 Pabbi Nowshera	A.V.P
26	Mst. Faheem Afshan (BS-16) ASDEO working as SDEO (F) Pabbi	ASDEO (F) BS-16 Jehangira Nowshera	A.V.P
27	Mst. Iffat Younas, SDEO (F) Ghazi Haripur	SDEO (F) Khanpur Haripur	A.V.P

2. No TA/DA allowed.

3. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal/ stamp paper to Secretary

Attested



A.V.P


15

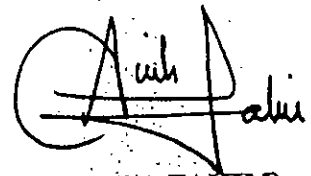
E&SED/ Directorate of E&SE Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

SECRETARY

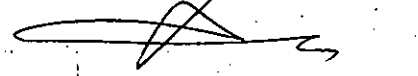
Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director DCTE, Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officers (Female) concerned.
5. District Accounts Officers concerned.
6. In-charge EMIS, E&SE Department for uploading at official website.
7. PS to Secretary E&SE Department, Peshawar.
8. Officers concerned.
9. Office order file.



(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

Attested


Annexure B

GOVERNMENT OF KHYBER PUKHTUN KHWA

CERTIFICATE OF TRANSFER OF CHARGE

Certified that I, Mst:Nusrat Jabeen Sub-Divisional Education Officer (Female) Takht Bhai (Mardan) have this day before/after noon relinquished/taken over charge of this office with reference to the Notification No. SO (S/F)E&SED/4-16/2018/Placement Committee dt: 05.01.2018

Transferring form Post Vacant
To Mst: Nusrat Jabeen S.D.E.O (Female) Takht Bhai (Mardan)

2. Particulars of Cash and Important/Secret/Confidential documents handed over are noted on the reverse.

Station, SDEO(F) Takht Bhai

Signature of relieved
Government Servant

Post Vacant

Designation:

S.D.E.O (F) T/Bhai

Signature of Government
Servant receiving charge

Mst:Nusrat Jabeen

Dated : 06.01.2018 (F/Noon)

Designation :

S.D.E.O (F) T/Bhai

Endst. No 3078/9 / Dated Takht Bhai the, 08/01 /2018

From:-

Sub-Divisional Education Officer,
(Female) Takht Bhai

To

1. Director of Elementary & Secondary Education Khyber Pakhtankhwa Peshawar.
2. District Education Officer (F) Mardan
3. District Comptroller of Accounts Malakand.

The charge of the Office Nadia Sub-Divisional Duction Officer (Female) Dargai Mkd: was transferred from Post Vacant to Mst:Nusrat Jabeen SDEO(F) T/Bhai on the after /fore noon of the 06.01.2018 (F/Noon)

Mst:Nusrat Jabeen
Sub-Divisional Education Officer
(Female) Takht Bhai

A Mostaf
[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the March 30th, 2018.

NOTIFICATION

NO.SO(SM) E&SED/2-1/2018/Posting/Transfer of DEO, DDEO & SDEOs:

Consequent upon the recommendation of the Placement Committee made in its meetings held on 20-03-2018, posting/transfers of the following, DEOs, DDEOs, SDEOs & HM are hereby ordered on the posts/ stations as mentioned against their names in the interest of public service with immediate effect:

S.#	Name, Designation & Present station	Transferred As	Remarks
1.	Mst. Naghmana Sardar (BS-18) (Management Cadre) (Awaiting posting)	DEO (Female) (BS-19) Nowshera (OPS)	Vice Sr. No.2
2.	Mr. Zulfiqar Ul Mulk (BS-18) DDEO (Female) Nowshera with additional charge of DEO (Female) Nowshera (Management Cadre)	Deputy Director (P&D) Directorate of E&SED	Vice Sr. No.3
3.	Mr. Naveed Akhtar, BS-18 Deputy Director (P&D) Directorate of E&SE	Services placed at the disposal of Directorate of E&SE KP	---
4.	Mst. Azra Bibi (BS-18) DEO (F) Tank (Management Cadre)	Services placed at the disposal of Directorate of E&SE KP	Charge of DEO (F) Tank assigned to DEO (M) Tank
5.	Mr. Fazle Wahid, (BS-17) SDEO (Male) Rajjar Swabi (Management Cadre)	Assistant Director, Directorate of E&SE KP	Vice Sr. No.6
6.	Mr. Liaqat Ali, (BS-17) Assistant Director, Directorate of E&SE KP (Management Cadre)	Assistant Director (Exams) at PITE Peshawar	Against vacant post
7.	Mr. Abdur Rauf, SS (Urdu) BS-17 GHSS Nogram Khudukhel Buner (Teaching Cadre)	SDEO (Male) (BS-17) Khudukhel Buner	-do-
8.	Mst. Tahira Gohar (BS-16) ASDEO Circle Sher Ghar Oghi (Teaching Cadre)	SDEO (Female) (BS-17) Oghi Mansehra (OPS)	-do-

Attested

Amir

17

Signature



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

9.	Mst. Shahida Parveen, (BS-17) SDEO (Femle) Prova D.I. Khan (Management Cadre)	Services placed at the disposal of Directorate of E&SE KP	---
10	Mst. Zahida Qayum, HM BS-17 Qandil Swat (Teaching Cadre)	SDEO (Female) (BS-17) Matta Swat	Against vacant post
11	Mr. Azhar Iqbal, HM (BS-17) working as Principal (BS-19) at GCMHS Alpuri, Shangla (Teaching Cadre)	HM (BS-17) GHS Kass Lilownai, Shangla	-do-
12	Mr. Mujahid Hussain Shah, (BS-17) SDEO (Male) Dassu Kohistan (Teaching Cadre)	HM (BS-17) GHS Kasala, Abbottabad	-do-
13	Mr. Fazal Qayyum, SS (Pushto) (BS-17) GHSS Lonkoh, Swat (Teaching Cadre)	SDEO (Male) (BS-17) Dassu, Kohistan	Vice Sr. No.12
14	Mst. Nusrat Jabeen (BS-17) SDEO (F) Takhtbai Mardan	SDEO (F) Katlang Mardan	Against vacant post
15	Mst. Rukhsana Rahim, (BS-17) SDEO (F) Topi Swabi	SDEO (F) Takhtbai Mardan	Vice Sr. No.14

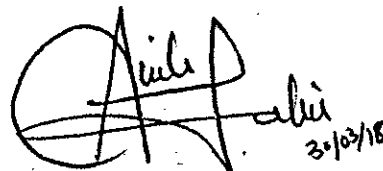
2. No TA/DA is allowed.

SECRETARY

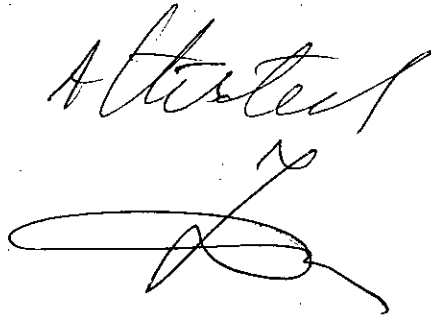
Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (M/F), Concerned.
4. District Account Officers, Concerned.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
6. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
7. Incharge EMIS E&SE Department.
8. Officers concerned.
9. Office order file.


3-10-18

(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS M/F)





Annexure D

19

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


No. SO(S/F)E&SED/4-16/2018/Appeal/Mst. Nusrat Jabeen/SDEO
Dated Peshawar the April 11th, 2018

To

Mst. Nusrat Jabeen (BS-17),
Ex-SDEO (Female) Takht Bhai Mardan,
Now SDEO (Female) Katlang Mardan.

**SUBJECT: CANCELLATION OF TRANSFER ORDER/ RETENTION AS SDEO (FEMALE)
TAKHT BHAI MARDAN**

I am directed to refer to your appeal dated 02-04-2018 on the subject noted above and to intimate that the Competent Authority has regretted your appeal on the ground that incumbent officer is from Management Cadre and the instant appeal is against the spirit of High Court judgment delivered in Hafiz Ibrahim case.

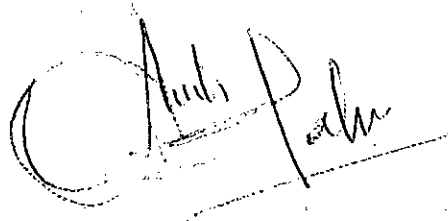

(ANEELA FAHIM)
SECTION OFFICER (S/F)

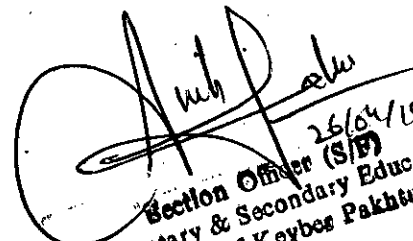
Endst: of even No. & Date:

Copy forwarded to the:

1. PS to Secretary, E&SE Department.
2. PS to Special Secretary, E&SE Department.


SECTION OFFICER (S/F)




26/04/18
Section Officer (S/F)
Elementary & Secondary Education
Deptt: Govt of Khyber Pakhtunkhwa

"accepted"

12

Ameera E

The Honourable Secretary,
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

20

Subject: - **CANCELATION OF TRANSFER ORDER/RETENTION AS SDEO (FEMALE) TAKHT BHAI MARAN.**

Respected Sir,

With due respected and to state that I Mst. Nusrat Jabeen was posted as SDEO (Female) Takht Bhai Mardan in the month of January 2018 and I was performing my duties with great zeal and honesty, and there was no complaint against me, but unexpectedly I was transferred as SDEO (Female) Katlang and Mst. Rukhsana Rahim was posted/transferred against SDEO (Female) Takht Bhai Mardan, which is against the rules as my tenure is less than three months.

Respected Sir, Rukhsana Rahim belongs to Takht Bhai, and as per rules she can't be posted at her home station, as there are various complaints against Mst. Rukhsana Rahim and transferred on disciplinary grounds and she has bad reputation regarding financial corruption throughout her career.

Therefore, it is requested in your honour to kindly cancel my transfer order and retain my self as SDEO (Female) Takht Bhai Maran. If my self may not be retained as SDEO (Female) Takht Bhai I will knock the door of Honourable High Court/Service Tribunal for justice.

Thank

Dated: 24/1/18 2018

NJ
Yours Sincerely

Nusrat Jabeen
SDEO (Female) Takht Bhai
Mardan.

Attest
[Signature]

بعدالت کے لیے پیروی کے لیے درخواست

2، پنجاب اسٹیٹ
 نصرت جیل، بنام حکومتی حکم
 اسلام آباد

موزخہ
 مقدمہ
 دعویٰ
 جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کارروائی متعلقہ
 آن مقام کے لیے کسٹمر کیلئے والی ذلی الیوم کے لیے
 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 ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
 بسورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے وہ ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

A trust and
 accepted

المرقوم
 واہ العبد
 Gazi - Farooq
 کے لیے منظور ہے۔ A

دستخط صاحب جیل
 17

Before the Chairman Service Tribunal Kpk Peshawar
In Re Appeal no. 575/18

Be fixed in 07-07-2018 Application
before the DB. Noha & ...
Kyber Pakhtunkhwa Service Tribunal
Dated 25.6.2018
No. 697
Grant & P.H. & others.

Nusrat Jabeen

Put up to the court with relevant app.

Application for early hearing hearing of the above titled Appeal.

read

Respectfully Sheweth:-

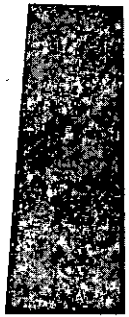
- ① that the above titled appeal is pending before this Hon'ble Court and has been fixed for 17/7/2018.
- ② that as the appeal is accompanied by an application for interim relief therefore the fixation of appeal for an early date is required.
- ③ that the Hon'ble Peshawar High Court was pleased to suspend the transfer order till 20/06/2018 which expires today hence this application.

It is therefore respectfully prayed that on acceptance of this application the above titled appeal may please be fixed for today i.e. 20/06/2018.

Appellant
through
Salim Raza Safi
Adv.

Accepted by
[Signature]

received



Before the Chairman Service Tribunal Khy Pakhtunkhwa
in Re Appeal no. 575/18

Be filed in 07-07-2018 Application
before the DB. Noha & stem
giving the date fixed
25.6.2018
No. 697
Dated 20/06/2018
Govt & P.H. & others.

Nusrat Jabeen

put up to the court
with relevant appeal

Application for early hearing hearing
of the above titled Appeal.
20/6/18

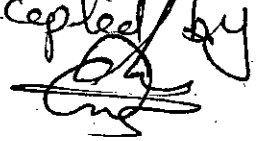
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Respectfully Sheweth:-

- ① that the above titled appeal is pending before this Hon'ble Court and has been fixed for 17/7/2018.
- ② that as the appeal is accompanied by an application for interim relief therefore the fixation of appeal for an early date is required.
- ③ that the Hon'ble peshawar High Court was pleased to suspend the transfer order till 20/06/2018 ~~with~~ which expires today hence this application.

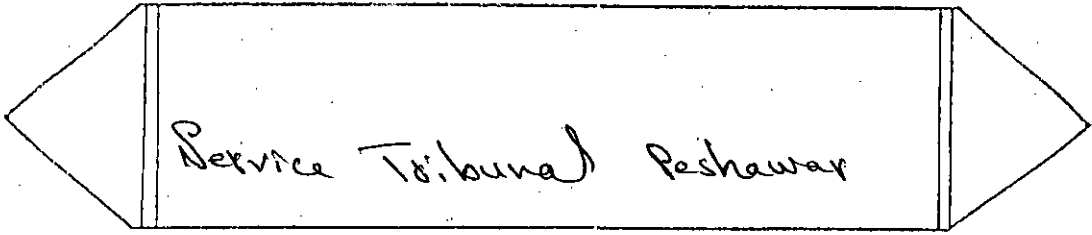
It is therefore respectfully prayed that on acceptance of this application the above titled appeal may please be fixed for today i.e. 20/06/2018.

Appellant
through
Salim Raza Safi
Adv.

لم منظور
Accepted by


رہند
5

بعدالت



R.No. 3 سب 2 منجانب

لعدت صاحب نام تعلیم

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئینک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل کاروائی متعلقہ

آن مقام Peshawar کیلئے Ugma Steel

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک در و پیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی 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 بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب 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 لکھ دیا کہ سند ہے۔

Accepted

المرقوم 1 8 2018

بمقام

Peshawar کے لئے منظور ہے۔

D. P. Peshawar

SDEO

1/8/018

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BEFORE THE KHYBER PAKHTUNKHWA TRIBUNAL
PESHAWAR.

Appeal No.575/2018

Nusrat Jabeen *** Versus**** Govt of KPK &
others.

WRITTEN REPLY ON BEHALF OF
RESPONDENT NO.3

Respectfully Sheweth:

Preliminary Objections:

- 1- That the appellant has got no cause of action to file the instant appeal.
- 2- That the appeal of the appellant is not maintainable in present form.
- 3- That Under Section -10 of Civil Servant Act 1973, appellant is liable to serve any where within or outside the province.
- 4- That the appellant cannot claim post of her choice as per Section 4 of the Service Tribunal Act 1974.
- 5- That the present appeal is bad for misjoinder and nonjoinder of necessary parties.
- 6- That the appeal is barred by law

7- That this Hon'ble Tribunal has got no jurisdiction to entertain the present appeal.

Facts:

A) In reply to Para A needs no comments.

B) The instant appeal is liable to be dismissed being devoid of merits.

1) In reply to Para No.1 of the appeal is correct to the extent that the appellant is employee of education department, however, she belongs to teaching cadre and through political motivation and exertion, got herself transferred to management cadre post. Moreover, the respondent was posted at Swabi on 20/05/2015 and then transferred to Katlang on 22/09/2016, after almost completed her tenure. (Copy of order is annexed as Annexure "A").

2) In reply of Para No.2, it is submitted that respondent No.3 belongs to Management Cadre whereas the appellant belongs to teaching cadre

post, therefore, appellant was transferred Govt Girls Higher School Mohib Banda.

- 3) Para No.3 of the appeal is irrelevant.
- 4) Para No.4 of the appeal is incorrect because vide order dated 14/11/2017 the appellant was promoted from the post of SST to the post of Subject Specialist, hence she cannot claim to complete tenure on management cadre post. (Copy of order is annexed as Annexure "B").
- 5) Para No.5 of the appeal to the extent of departmental appeal and its rejection is correct. However, the appellate authority while deciding departmental appeal vide order dated 11/04/2018 clearly mentioned that the respondent / incumbent Officer is from Management Cadre and the department appeal of the appellant was held to be against the spirit of Hon'ble Peshawar High Court Judgment delivered in Hafiz Ibrahim case.

6) *The appellant has got no cause of action to file the instant service appeal.*

Grounds:

A) *Incorrect. The transfer order of the appellant has been issued by competent authority, which is liable to be upheld.*

B) *As admitted by the appellant in this para, the appellant is SS and she cannot claim to be posted on management cadre post.*

C) *Incorrect. Tenure cannot be claimed on wrong cadre. The appellant can claim completion of tenure in her own cadre although competent authority is vested with powers to transfer any civil servant any time in exigencies of service.*

D) *Incorrect. As replied in paras above.*

E) *Incorrect. The appellant is SS and her post is Provincial Cadre so the transfer order cannot be held illegal on the ground that she has been transferred to for away place.*

- F) *Incorrect. As replied above.*
- G) *Incorrect. It is no ground for cancellation of transfer order that the appellant can easily come for duty to Takht Bhai and Katlang because both places are feasible to appellant.*
- H) *Incorrect. The transfer order is issued in accordance with law and policy on the subject and the appellant was required to have implemented the transfer order.*

It is, Therefore, prayed that on acceptance of reply, the service appeal being devoid of merits, may be dismissed with costs.

Dated 01/08 /2018

Respondent No.3

R. R. Rahim

*Miss. Rukhsana Rahim
SDEO Female,
Katlang*



BEFORE THE KHYBER PAKHTUNKHWA TRIBUNAL
PESHAWAR.

Appeal No.575/2018

*Nusrat Jabeen *** Versus**** Govt of KPK &
others.*

Affidavit

*I, Miss Rukhsana Rahim SDEO Female, Katlang
do hereby solemnly affirm and state on oath that all
contents of accompanied reply in service appeal are true
and correct to the best of my knowledge and belief and
nothing wrong has been stated by me in the matter.*

R. R. Rahim

DEPONENT

CNIC # 16101-1084133-6



②

Annex ①

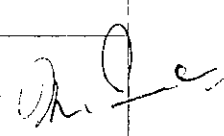
**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the September 22nd, 2016

NOTIFICATION

NO. SO(S/F)E&SE/4-16/2016/Placement Committee: Consequent upon the recommendations of Placement Committee, posting/ transfer in respect of following female officers from management/ teaching cadre in the Elementary & Secondary Education Department are hereby ordered against the management posts noted against each in the interest of public service with immediate effect: -

S#	Name of Officer	Proposed as	Remarks
1.	Mst. Tujza ASDEO (F) BS-16 Bannu (Teaching cadre)	SDEO (F) BS-17 Lakki Marwat (in her own pay & scale)	Against newly sanctioned post
2.	Mst. Tasleem Bibi H/M BS-17 GGHS Dagai Bunir (Teaching cadre)	SDEO (F) BS-17 Khadukhail Bunir	-do-
3.	Mst. Rizwana Jabeen H/M BS-17 GGHS Daraban Kalan DIKhan (Teaching cadre)	SDEO (F) BS-17 Daraban DIKhan	-do-
4.	Mst. Shakila Bano H/M BS-17 GGHS Khadakzai Dir lower	SDEO (F) BS-17 Dir Lower	-do-
5.	Mst. Nasim Begum ASDEO (F) BS-16 Dir Lower	SDEO (F) BS-17 Balambat Dir Lower (in her own pay & scale)	-do- <i>Amir</i>
6.	Mst. Gul Farzana ASDEO (F) BS-16 Chitral (Management cadre)	SDEO (F) BS-17 Kal Kot Dir Upper (in her own pay & scale)	-do-
7.	Mst. Zahida Khanum ASDEO (F) BS-16 Chitral (Management cadre)	SDEO (F) BS-17 Munda Dir Lower (in her own pay & scale)	-do-
8.	Mst. Shakila Anjum ASDEO (F) BS-16 Chitral (Management cadre)	SDEO (F) BS-17 Khall Dir Lower (in her own pay & scale)	-do-
9.	Shaheen SDEO (F) BS-17 Timer Garah Dir Lower	SDEO (F) BS-17 Adenzai Dir Lower	-do-
10.	Mst. Shabana ASDEO (F) BS-16 Hangu (Management cadre)	SDEO (F) BS-17 Thall Hangu (in her own pay & scale)	-do-

S#	Name of Officer	Proposed as	Remarks
11.	Mst. Iffat Younas SS BS-17 GGHSS Chapra Haripur (Teaching cadre)	SDEO (F) BS-17 Ghazi Haripur	-do-
12.	Mst. Zafrana ASDEO (F) BS-16 Lakki Marwat (Teaching cadre)	SDEO (F) BS-17 Domail Bannu (in her own pay & scale)	-do-
13.	Mst. Sughra Mehboob SS BS-17 GGHSS Behali Mansehra (Teaching cadre)	SDEO (F) BS-17 Balakot Mansehra	Against newly sanctioned post
14.	Mst. Shazia Bibi SS BS-17 GGHSS Muradpur Mansehra (Teaching cadre)	SDEO (F) BS-17 Ogi Mansehra	-do-
15.	Mst. Fozia Sultana H/M BS-17 GGHS Hisartang Nowshera (Teaching cadre)	SDEO (F) BS-17 Jehangira Nowshera	-do-
16.	Mst. Faheem Afshan ADEO (F) BS-16 Nowshera	SDEO (F) BS-17 Pabbi Nowshera	-do-
17.	Mst. Najma Khan (B-17) SS GGHSS Odigram Swat (Teaching cadre)	SDEO (F) BS-17 Alpuri Shangla	-do- 
18.	Mst. Naheed Anwar SS BS-17 GGHSS Kalu Khan Swabi (Teaching cadre)	SDEO (F) BS-17 Razzar Swabi	-do-
19.	Mst. Bakht Bahar SS BS-17 GGHSS Matta Swat (Teaching cadre)	SDEO (F) BS-17 Bahrain Swat	-do-
20.	Mst. Irshad Begum SS BS-17 GGHSS Tahir Abad Swat (Teaching cadre)	SDEO (F) BS-17 Barikot Swat	-do-
21.	Mst. Shahnaz ASDEO (F) BS-16 Circle Charbagh Swat	SDEO (F) BS-17 Charbagh Swat (in her own pay & scale)	-do-
22.	Mst. Bibi Yasmin H/M BS-17 GGHSS Khawazakhela Swat (Teaching cadre)	SDEO (F) BS-17 Khawazakhela Swat	-do-
23.	Mst. Dur-e-Shawar H/M BS-17 GGHS Zarakhela Swat (Teaching cadre)	SDEO (F) BS-17 Kabal Swat	-do-
24.	Mst. Zahida Qayum SST BS-16 GGHS Matta Swat (Teaching cadre)	SDEO (F) BS-17 Matta Swat (in her own pay & scale)	-do-



S#	Name of Officer	Proposed as	Remarks
25.	Mst. Gul Raj ADEO (F) BS-16 Peshawar	SDEO (F) BS-17 Town-II Peshawar (in her own pay & scale)	-do-
26.	Mst. Hifza Gul (BS-17) Assistant Director Directorate E&SE (Management cadre)	SDEO (F) BS-17 Town-I Peshawar	-do-
27.	Mst. Nizakat Tabassum ASDEO (F) BS-16 Peshawar	SDEO (F) BS-17 Town-IV Peshawar (in her own pay & scale)	-do-
28.	Safia Amin SDEO (F) BS-17 Peshawar (Management cadre)	SDEO (F) BS-17 Town-III Peshawar	-do-
29.	Nargus SDEO (F) BS-17 Lakki Marwat	SDEO (F) BS-17 Sarai Naurang Lakki Marwat	-do-
30.	Sadia Aziz SDEO (F) BS-17 Battagram (Management cadre)	SDEO (F) BS-17 Havelain, Abbottabad	-do-
31.	Sumera Sheraz SDEO (F) BS-17 Nowshehra (Management cadre)	Assistant Director (BS-17) Directorate E&SE	A.V.P
32.	Mst. Rukhsana Rahim BS-17 SDEO F Swabi (Management cadre)	SDEO (F) BS-17 Katlang Mardan	-do-
33.	Mst. Farhat Yasmin ASDEO (F) BS-16 Karak	SDEO (F) BS-17 Takht-e-Nasrati Karak (in her own pay & scale)	-do-
34.	Mst. Shahnaz ASDEO (F) BS-16 Karak	SDEO (F) BS-17 Karak (in her own pay & scale)	-do-
35.	Mst. Naila Naz ASDEO (F) BS-16 Topi Swabi	SDEO (F) BS-17 Topi Swabi (in her own pay & scale)	-do-
36.	Mst. Shah Jehan BS-17 H/M GGHS Lahor Swabi (Teaching cadre)	SDEO(F) BS-17 Lahor Swabi	-do-
37.	Mst. Rehana Begum SS BS-17 GGHS Kotha Swabi (Teaching cadre)	SDEO (F) BS-17 Swabi	-do-
38.	Mst. Nighat Seema ASDEO (F) BS-16 Mardan (Teaching cadre)	SDEO (F) BS-17 Takhtbhai Mardan (in her own pay & scale)	-do-
39.	Zuhra Jalal BS-18 (Teaching Cadre) Dy. District Education Officer (Female) Chitral	Dy. District Education Officer BS-18 (Female) Dir Upper with Additional Charge of DEO(F)	Vice S. No. 40

S#	Name of Officer	Proposed as	Remarks
40.	Bibi Halima BS-18 Dy: District Education Officer (Female) (Teaching Cadre) Dir Upper	Dy: District Education Officer BS-18 (Female) Chitral with Additional Charge of DEO(F)	Vice S. No. 39
41.	Nusrat Bib BS-18 Principal GGHSS Palai Malakand(Teaching Cadre)	Dy: District Education Officer BS-18 (Female) Dir Lower with Additional Charge of DEO(F) Dir Lower	A.V.P
42.	Ulfat Begum BS-18 (Management Cadre DDEO(Female) Peshawar with Additional charge of the post of DEO (F) Peshawar	Against the post of DEO (F) BS-19 Peshawar in her own pay & scale)	Against vacant post already occupied by her
43.	Surriya Begum BS-18 (Management Cadre) under transfer as Vice Principal GGBSHSS Peshawar	DDEO(F) (BS-18) Peshawar	Vice S. No. 42

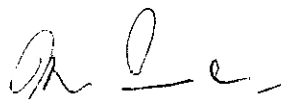
2. No TA/ DA allowed.
3. The order of officers at S. No. 1, 5, 6, 7, 8, 10, 12, 16, 21, 24, 25, 27, 33, 34, 35, 38 & 42 will be effective subject to the condition that they will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SE/ Directorate E&SE Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

Endst: of even No. & date:

SECRETARY

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (F) concerned.
4. District Accounts Officers concerned.
5. In charge EMIS, E&SE Department for uploading at official website.
6. PS to Minister for E&SE Khyber Pakhtunkhwa.
7. PS to Secretary E&SE Department.
8. Officers concerned.
9. Office order file.



(LAL SAEED KHATTAK)
SECTION OFFICER (SCHOOLS/ FEMALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 14-11-2017

NOTIFICATION

No.SO(PF)/2-6/DPCMeeting/SST-SS (03-10-2017): On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following Three Hundred and Fifty Five (355) Female SSTs (BS-16) to the post of Subject Specialist (BS-17) on regular basis with immediate effect:-

1. English

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
1.	523	Riasat M.A M.ed GGHS Panr	SS English BS-17 GGHS Gwalerai Swat	Against the vacant post
2.	715	Jannat Zahir M.A M.Ed GGHS Guligram	SS English BS-17 GGHS No. 2 Mangora	Against the vacant post
3.	956	Fazilat Ayub MA,M.ED GGHS NO.02 DIKhan	SS English BS-17 GGHS No. 9 DIKhan	Against the vacant post
4.	1143	Nazneen Akram GGHS No.4 Bannu City	SS English BS-17 GGHS Kotka Bilawal Khan Bannu	Against the vacant post
5.	1179	Mst. Zain-ul-Haram SST (Sc) GGHS Kundi Sherawal Haripur	SS English BS-17 GGHS Topi Swabi	Against the vacant post
6.	1182	Mst. Hussan Taj SST GGMS Amanullah Jan Kot NWA	Services placed at the disposal of FATA	Against the vacant post
7.	1230	Rizwana Gul MA/M.Ed GGHS Sangar Mansehra	SS English BS-17 GGHS Oghi Mansehra	Against the vacant post
8.	1238	Secma Safdar M.Phil B.Ed GGHS Kabal	SS English BS-17 GGHS Mansehra Swat	Against the vacant post
9.	1260	Naheed Khalil M.A B.EdeGGHS Aboha Swat	SS English BS-17 GGHS Batkhela Malakand	Against the vacant post
10.	1274	Saima MA English GGHS, Dak Ismail Khel	SS English BS-17 GGHS Dak Ismail Khel Nowshera	Against the vacant post
11.	1282	Sadia Saleem MA GGHS Maho Dheri Mardan	SS English BS-17 GGHS Ghalladher Mardan	Against the vacant post
12.	1287	Atia Naz GGMS Jica Model School Mardan	SS English BS-17 GGHS Rustam Khel Mardan	Against the vacant post
13.	1298	Nusrat Jabeen/ MA,LLB,M.Ed GGMS Essa Khel	SS English BS-17 GGHS B.S.D. Peshawar	Against the vacant post
14.	1301	Shafiqua Bibi MA/M.Ed GGHS Mohayian Mansehra	SS English BS-17 GGHS Shergarh Mansehra	Against the vacant post
15.	1316	Mst. Gul Nasreen SST (G) GGHS Behzadi Chakar Kot Kohat	SS English BS-17 GGHS Lachi Kohat	Against the vacant post
16.	1326	Syeda Ume Salma SST GGHS Kurez Orakzai Agency	Services placed at the disposal of FATA	Against the vacant post
17.	1329	Shehnaz Anjum MA, M.Ed GGMS Kazim Killi Mardan	SS English BS-17 GGHS Taktubhai Mardan	Against the vacant post
18.	1390	Javeria Arshad MA/MED CGMGHS Haripur	SS English BS-17 GGHS Beer Haripur	Against the vacant post
19.	1391	Sadia Masroor Naqvi MA / BED GGHS Sarai Namat Khan	SS English BS-17 GGHS Baja Swabi	Against the vacant post
20.	1413	Sumaira Iqbal MA/M.Ed GGMS No.1 Mansehra	SS English BS-17 GGHS Lessan Nawab Mansehra	Against the vacant post
21.	1423	Mst. Uzma Sardar SST (G) GGHS Kharmatoo Kohat	SS English BS-17 GGHS Togh Bala Kohat	Against the vacant post
22.	1452	Lubna Jabeen GGMS Kala Khel Masti Khan Bannu	SS English BS-17 GGHS Qamarzaman Mandew Bannu	Against the vacant post
23.	1453	Mst. Meher Taj SST GGHS Sabir Abad Karak	SS English BS-17 GGHS Esak Chuntral Karak	Against the vacant post
24.	1525	Gul-e-Rehana MA/MED GGHS Sirikote Haripur	SS English BS-17 GGHS Sari Kot Haripur	Against the vacant post
25.	1526	Mst. Bibi Haleema SST Sheikho Sardheri Charsadda	SS English BS-17 GGHS Turangzai Charsadda	Against the vacant post

26.	1549	Shahana Gul GGHS No.4 Bannu City	SS English BS-17 GGHS Mumbathi Barakzai Bannu	Against the vacant post
27.	1558	Bibi Fatima, MA.MED GGHS Battagram	SS English BS-17 GGHS Tikri Kirarhy Battagram	Against the vacant post
28.	1567	Farzana Sanam MA/B.Ed GGMS Ichrian Mansehra	SS English BS-17 GGHS Behali Mansehra	Against the vacant post
29.	1574	Noreen Ghaffar SST MA/MED GGHS Kharian	SS English BS-17 GGHS Noordi Haripur	Against the vacant post
30.	1576	Mst. Gul Naz SST GGHS Kotkha Mirajuddin PR Bannu	Services placed at the disposal of FATA	Against the vacant post
31.	1597	Ayesha M.A (M.Ed GGHS No.1 Mingora	SS English BS-17 GGHS Kala Killi Swat	Against the vacant post
32.	1604	Saima Noreen SST Sc GGHS Sherwan A/Abad	SS English BS-17 GGHS Sherwan Abbottabad	Against the vacant post
33.	1623	Salma Sami/Ph.D Edu: GGMS Shahi Bala Peshawar	SS English BS-17 GGHS Jogiwara Peshawar	Against the vacant post
34.	1650	Salma Shaheen GGMS Rasool Khan Chak Dadan Bannu	SS English BS-17 GGHS Domail Bannu	Against the vacant post
35.	1651	Shaista Malik MA/M.Phil /M.Ed GGHS Chitta Batta Mansehra	SS English BS-17 GGHS Tarawara Mansehra	Against the vacant post
36.	1661	Rana Karam MA M.Ed GGHS Fazal Abab Kan	SS English BS-17 GGHS No.2 Saidu Sharif Swat	Against the vacant post
37.	1684	Zuhra bibi MA/ M.Ed GGHS Balakot Mansehra	SS English BS-17 GGHS Balakot Mansehra	Against the vacant post
38.	1709	Asma Qazi MA (Eng) MED GGHS Mirpur	SS English BS-17 GGHS Rich Bhen Abbottabad	Against the vacant post
39.	1727	Kaneez Fatima SST GGMS Adil Sipra DIKhan	SS English BS-17 GGHS Fazle Rahim Colony DI Khan	Against the vacant post
40.	1760	Saima Noreen MA/B.Ed GGHS Mangloor Mansehra	SS English BS-17 GGHS Ophi Mansehra	Against the vacant post
41.	1768	Samina M.A;M.Ed GGMS Shin Swat	SS English BS-17 GGHS Matta Swat	Against the vacant post
42.	1774	Shabnam Bibi GGHS Dheri Saidan Bannu	SS English BS-17 GGHS Ghoriwala Bannu	Against the vacant post
43.	1798	Faiza Tabasum MA/M.Ed GCMS Jaba Sheikhabad Mansehra	SS English BS-17 GGHS Lora Abbottabad	Against the vacant post
44.	1811	Shazia Khalid M.A; M.Ed GGHS Chail Shagai	SS English BS-17 GGHS Charbagh Swat	Against the vacant post
45.	1812	Sonia Sultana MA M.Ed GGHS Fatehpur Swat	SS English BS-17 GGHS Fatehpur Swat	Against the vacant post
46.	1821	Zebi Shahnaz MA English GGHS, Khairabad	SS English BS-17 GGHS Khair Abad Nowshera	Against the vacant post
47.	1822	Irfana Rasool MA,M.ED GGHS Kacha Mali Khel DIKhan	SS English BS-17 GGHS Bilot Sharif DIKhan	Against the vacant post
48.	1825	Bibi Fatima, SST (Gen),GGHS No.1, Sarai Nourang Lakki	SS English BS-17 GGHS Nar Shukurullah Bannu	Against the vacant post
49.	1873	Amina Begum M.Ed GGHS Murad Pur	SS English BS-17 GGHS Ghari Phulgran Abbottabad	Against the vacant post
50.	2056	Aisha Qazi SST GGHS Alizai Peshawar	SS English BS-17 GGHS Khyber Colony Peshawar	Against the vacant post
51.	2327	Mst. Uzma Karim D.O Muhammad Karim GGHS Ahigaro Dheri Swat	SS English BS-17 GGHS Kabal Swat	Against the vacant post
52.	2369	Mst. Faseeha Malik SST GGCMS Haripur	SS English BS-17 GGHS Gar Munara Swabi	Against the vacant post
53.	2413	Mst. Robina Khan GGHS Manki Sharif Nowshera	SS English BS-17 GGHS Manki Sharif Nowshera	Against the vacant post
54.	2417	Mst. Huma Rehman SST GGHS Kotha Swabi	SS English BS-17 GGHS Kalabat Swabi	Against the vacant post
55.	2431	Amina Qazi SST GGHS No.1 Peshawar Cantt:	SS English BS-17 GGHS Lady Griffith Peshawar	Against the vacant post
56.	2513	Farhat Bibi SST GGMS No. Bura Gate Peshawar	SS English BS-17 GGHS No. 2 Peshawar Cantt:	Vice S. No. 360
57.	2535	Irum Andaleeb Qureshi SST GGHS Wanda Hisam DIKhan	SS English BS-17 GGHS Behari Colony DI Khan	Against the vacant post

58.	2571	Mst. Shukria Bibi SST GGMS Moughaldeh Chitral	SS English BS-17 GGHSS Shiaqotake Chitral	Against the vacant post
59.	2677	Mst. Shamaila SST GGHS Jisgran Payeen Manshra	SS English BS-17 GGHSS No.2 Manshra	Against the vacant post
60.	2726	Mst. Saira Bibi SST GGHS Sirya Haripur	SS English BS-17 GGHSS Pabbaini Swabi	Against the vacant post
61.	2730	Bushra Ishaq GGCMSS Hisar Baba Malakand	SS English BS-17 GGHSS Koper Malakand	Against the vacant post
62.	2735	Mehnaz Hassan SST GGHSS Panyala DIK	SS English BS-17 GGHSS Panyala DIKhan	Against the vacant post
63.	2863	Mst. Zubaida Razaq SST GGHSS Chamkani Peshawar	SS English BS-17 GGHSS Chamkani Peshawar	Against the vacant post
64.	2866	Mst. Shazia Begum SST GGHS Sarwar Shah Kothe Gohati Swabi	SS English BS-17 GGHSS Dagai Swabi	Against the vacant post
65.	2887	Mst. Sadia Iqbal SST GGHS Talokar Haripur	SS English BS-17 GGHSS Hattar Haripur	Against the vacant post
66.	2955	Sobia Haq GGHS Kaddi Swabi	SS English BS-17 GGHSS Kaddi Swabi	Against the vacant post
67.	2994	Mst. Nusrat Jabeen SST GGCMSS Chitral	SS English BS-17 GGHSS Warijum Chitral	Against the vacant post
68.	3200-A	Mst. Nuzhat Shaheen SST GGHS Dhodial A/Abad	SS English BS-17 GGHSS Hajia Gali Abbottabad	Against the vacant post

2. Urdu

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
69.	214	Begum Khatoon/MA Med GGHS University Town	SS Urdu BS-17 GGHSS Tarnab Farm Peshawar	Against the vacant post
70.	215	Mst. Salma Begum SST (G) GGHS No.2 Peshawar Cantt	SS Urdu BS-17 GGHSS No.2 Peshawar Cantt	Vice S.No. 356
71.	296	Mst. Rashida Younis SST GGHS Gudwalian Haripur	SS Urdu BS-17 GGHSS Seri Kot Haripur	Against the vacant post
72.	381	Mst. Qamar-un-Nisa SST GGHSS BSD Peshawar	SS Urdu BS-17 GGHSS BSD Peshawar	Against the vacant post
73.	383	Mst. Shamim Akhtar SST GGMS Danin Chitral	SS Urdu BS-17 GGHSS Shevaqotak Chitral	Against the vacant post
74.	407	Nafes Fatima, SST BA BEd GGHS Hayatabad Peshawar	SS Urdu BS-17 GGHSS Badber Peshawar	Against the vacant post
75.	451	Jehan Aftab M.A B.Ed GGHS Gwalarai	SS Urdu BS-17 GGHSS Gwalarai Swat	Against the vacant post
76.	454	Nizakat Wahab MA, B.ED GGMS Adam Dehrai	SS Urdu BS-17 GGHSS Kityari Dir Lower	Against the vacant post
77.	464	Bibi Sajida SST (Sc) GGHS Nisharabad Peshawar	SS Urdu BS-17 GGHSS Wadpaga Peshawar	Against the vacant post
78.	466	Farah Deeba GGHS Dargai Mkd	SS Urdu BS-17 GGHSS Sakhakot Malakand	Against the vacant post
79.	468	Robina Safi/MA M.Ed GGHS Khyber Colony	SS Urdu BS-17 GGHSS Khyber Colony Peshawar	Against the vacant post
80.	490	Mst. Tahira Bibi SST GGHS Dara Ramora Dir Lower	SS Urdu BS-17 GGHSS Shawa Dir Lower	Against the vacant post
81.	512	Shahida Taskeen Lodhi, SST M.A GGHS Mirpur	SS Urdu BS-17 GGHSS Sherwan Abbottabad	Against the vacant post
82.	519	Ghazala Noreen GGHS maneri Swabi	SS Urdu BS-17 GGHSS Gulshan Abad Swabi	Against the vacant post
83.	520	Mst. Abida Shaheen SST GGMS Simlan Negar Haripur	SS Urdu BS-17 GGHSS Noordi Haripur	Against the vacant post
84.	522	Shabnam Alam M.A B..Ed GGHS Ghalagay	SS Urdu BS-17 GGHSS No. 1 Saidu Sharif Swat	Against the vacant post
85.	526	Ruqia GGHS Tordher Swabi	SS Urdu BS-17 GGHSS Shahmansoor Swabi	Against the vacant post
86.	531	Mst. Naila Parveen SST GGHSS Matta Swat	SS Urdu BS-17 GGHSS Kabal Swat	Against the vacant post
87.	532	Mst. Shakila Naz SST GGHS Sakhakot Mkd	SS Urdu BS-17 GGHSS Sakhakot Malakand	Against the vacant post
88.	533	Almas Begum M.A.M Ed GGHS Charbagh	SS Urdu BS-17 GGHSS Charbagh Swat	Against the vacant post

89.	547	Ruqqiya-tu-zuhra SST/AAEO Office FR Peshawar	Services placed at the disposal of FATA	Against the vacant post
90.	554	Mst. Khalida Jan SST GGMS Payoo Noor Jamrud	Services placed at the disposal of FATA	Against the vacant post
91.	555	Mst. Safia Begum SST GGMS Wazir Killay Moh: Agency	Services placed at the disposal of FATA	Against the vacant post
92.	567	Robina SST GGHS Karigar Garhi Bara Khyber Agency	Services placed at the disposal of FATA	Against the vacant post
93.	582	Mst. Alla Tammama SST (G) GGMS Tariqabad Charsadda	SS Urdu BS-17 GGHSS Utmanzai Charsadda	Against the vacant post
94.	580	Saima Khadin/M.A. M.Ed. M.Phil GGHSS Jogiwara	SS Urdu BS-17 GGHSS Jogiwara Peshawar	Against the vacant post
95.	610	Shagufta Nazir MA, M.Ed GGCMSS No.1 A/Abad	SS Urdu BS-17 GGHSS Lora Abbottabad	Against the vacant post
96.	613	FAIZA GGHS MANERI BALA Swabi	SS Urdu BS-17 GGHSS Kalu Khan Swabi	Against the vacant post
97.	619	Mst. Shabana Bibi GGHSS BSD Peshawar	SS Urdu BS-17 GGHSS Mathra Peshawar	Against the vacant post
98.	626	Mst. Jehanzeb Ghani SST GGMS Ahmad Khel Peshawar	SS Urdu BS-17 GGHSS Chamkani Peshawar	Against the vacant post
99.	647	Nazneen Shah MA Urdu GGMS, Khattak Building NSR	SS Urdu BS-17 GGHSS Badrashi Nowshera	Against the vacant post
100.	668	Razia Sultana GGHS Qudrat Killi Mardan	SS Urdu BS-17 GGHSS No.1 Mardan	Against the vacant post
101.	669	Bibi Aisha M.A M.Ed GGHSS Matta Swat	SS Urdu BS-17 GGHSS Matta Swat	Against the vacant post
102.	670	Samreen Rabia GGCMS No.1 DIKhan	SS Urdu BS-17 GGHSS Din Pur DIKhan	Against the vacant post
103.	674	Nasreen Begum GGHSS Koper Mkd	SS Urdu BS-17 GGHSS Koper Malakand	Against the vacant post
104.	684	TASLEEM NOOR GGHS HATHIAN Mardan	SS Urdu BS-17 GGHSS Hathyan Mardan	Against the vacant post
105.	694	Seema Afridi/MA Med GCMGHS Nauthia	SS Urdu BS-17 GGHSS Comprehensive Peshawar	Against the vacant post
106.	705	Mst. Rozia Bashir SST/Inst: PITE Peshawar	SS Urdu BS-17 GGHSS Sufaid Sang Peshawar	Against the vacant post
107.	706	Ruqia Khatoon M/MED GGJMS Vijjian Haripur	SS Urdu BS-17 GGHSS Khanpur Haripur	Against the vacant post
108.	711	Mumtaz Begum GGMS Mander Killa Karak	SS Urdu BS-17 GGHSS No. 1 Karak	Against the vacant post
109.	712	Razia Khattak GGHS Palosa Kamari Karak	SS Urdu BS-17 GGHSS Esak Chontra Karak	Against the vacant post
110.	713	Rukhsana Jabeen GGHS Gandaf Swabi	SS Urdu BS-17 GGHSS Pabaini Swabi	Against the vacant post

3. Islamiyat

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
111.	186	Rukhsana Begum MA /BED GGHS No.2 Haripur	SS Islamiyat BS-17 GGHSS Panian Haripur	Against the vacant post
112.	338	Humaira Bibi MA/MED GGHS No.2 Haripur	SS Islamiyat BS-17 GGHSS Noordi Haripur	Against the vacant post
113.	368	Mst. Nasima Shaheen SST GGHS Prova DIKhan	SS Islamiyat BS-17 GGHSS Prova DIKhan	Vice S. No. 357
114.	458	Altaf Jamalullah M.A/ B.Ed GGHSS Panjar Bunir	SS Islamiyat BS-17 GGHSS Panjar Bunir	Against the vacant post
115.	462	Naheed Mubarak MA/MED GGHS Mir Pur.	SS BS-17 GGHSS Noordi Haripur	Against the vacant post
116.	465	Naheed Sultana MA , B.ED GGHS Timergara	SS (Islamiyat) BS-17 GGHSS Koto Dir Lower	Against the vacant post
117.	485	Mst. Ghazala Yasmin SST (G) GGHSS Sakhakot Malakand	SS (Islamiyat) BS-17 GGHSS Sakhakot Malakand	Against the vacant post
118.	487	Raeesa Ilyas MA Islamiat GGHSS, Khairabad	SS Islamiyat BS-17 GGHSS Akora Khattak Nowshera	Against the vacant post
119.	492	Shazia Anjum/MA Med GGHS Shaheen Camp	SS Islamiyat BS-17 GGHSS Azakhel Bala Nowshera	Against the vacant post

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120.	498	Sadaqat MA, M.Ed GGMS Baghdada Mardan	SS Islamiyat BS-17 GGHSS Gujar Garhi Mardan	Against the vacant post
121.	502	Shahi Zeenat M.A; M.Ed GGHSS Totanobandi Swat	SS Islamiyat BS-17 GGHSS Totanobandi Swat	Against the vacant post
122.	506	Mst. Nusrat Jabeen SST GGMS Maira Kachori Peshawar	SS Islamiyat BS-17 GGHSS Azakhel Pavan Nowshera	Against the vacant post
123.	509	Shad Bibi M.A; M.Ed GGHS Khwazakhela	SS Islamiyat BS-17 GGHSS Patchpur Swat	Against the vacant post
124.	513	Fozia Begum MA GGHS Maho Dheri Mardan	SS (Islamiyat) BS-17 GGHSS Ghalladher Mardan	Against the vacant post
125.	516	Mst. Nargis SST (Sc) GGHS Par Hoti Mardan	SS Islamiyat BS-17 GGHSS Par Hoti Mardan	Against the vacant post
126.	518	Shabnam Saddiq M.A.M.Ed GGHS No.1 Mingora	SS Islamiyat BS-17 GGHSS Odigram Swat	Against the vacant post
127.	525	Ghazala Shabnam GGHS No.1 Mardan	SS Islamiyat BS-17 GGHSS Kati Garhi Mardan	Against the vacant post
128.	529	Falak Naz GGHSS Shahbaz Garhi Mardan	SS Islamiyat BS-17 GGHSS Cham Dheri Mardan	Against the vacant post
129.	538	Yasmeen Bibi GGHS Qaldara Mkd	SS (Islamiyat) BS-17 GGHSS Palonow Malakand	Against the vacant post
130.	561	Mst. Zahida Bibi AAEO (F) FR DIKhan	Services placed at the disposal of FATA	Against the vacant post
131.	568	Nosheen Aziz/MA Bed GGHSS Chamkanni	SS Islamiyat BS-17 GGHSS Aza Khel Pavan Nowshera	Against the vacant post
132.	575	Shahida Parveen GGMS Charagh Din Killi Mardan	SS Islamiyat BS-17 GGHSS Qasmi Mardan	Against the vacant post
133.	593	Kosar Jabeen MA/M.Ed GGHS Baidra	SS Islamiyat BS-17 GGHSS No.2 Mansehra	Against the vacant post

4. Pashto

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
134.	84	Mst. Rohida SST MA Bed GGHS Comp: Peshawar	SS Pashto BS-17 GGHSS Comp: Peshawar	Against the vacant post
135.	220	Mst. Tafzeel Begum SST GGHSS Shabqadar Fort Charsadda	SS Pashto BS-17 GGHSS Shabqadar Fort Charsadda	Against the vacant post
136.	493	Bibi Sadia M.A M.Ed GGHS Aboha Swat	SS Pashto BS-17 GGHSS Odigram	Against the vacant post
137.	503	Mst. Mufceda Rahim SST GGMS Sorana Mkd	SS Pashto BS-17 GGHSS Agra Malakand	Against the vacant post
138.	524	Humera Naz GGMS Zoormandai Mkd	SS Pashto BS-17 GGHSS Koper Malakand	Against the vacant post
139.	528	Nizakat Ambar M.A MB.Ed GGHS Shaheen Abad Swat	SS Pashto BS-17 GGHSS No.2 Saidu Sharif Swat	Against the vacant post
140.	678	Sardar Jehan M.A; M.Ed GGHS Panr Swat	SS Pashto BS-17 GGHSS No.1 Saidu Sharif Swat	Against the vacant post
141.	709	Miss Zahida Begum SST (G) GGMS Mani Khela	SS Pashto BS-17 GGHSS Harichand Charsadda	Against the vacant post
142.	722	Miss Misbahia SST (G) GGHSS Dhakki	SS Pashto BS-17 GGHSS Dhakki Charsadda	Against the vacant post
143.	732	Mst. Farzana Begum SST GGHS Ali Jan Killay Charsadda	SS Pashto BS-17 GGHSS Ziam Charsadda	Against the vacant post
144.	735	Miss Naeema Begum SST (G) GGHSS Umerzai Chd	SS Pashto BS-17 GGHSS Sherpao Charsadda	Against the vacant post
145.	769	Aqteem Jehan MA, M.Ed GGHS Shekhano Banda Mardan	SS Pashto BS-17 GGHSS Katlang Mardan	Against the vacant post
146.	806	Azra Jabeen GGHS Marghuz Swabi	SS Pashto BS-17 GGHSS Gar Munara Swabi	Against the vacant post
147.	816	Surraya Begum MA, M.Ed GGMS Shamilat Zarifi Mardan	SS Pashto BS-17 GGHSS Parkho Dheri Mardan	Against the vacant post
148.	841	FARZANA RASOOL. GGMS GARYALA. Mardan	SS Pashto BS-17 GGHSS Rashakai Nowshera	Against the vacant post
149.	846	Bakht Jehan MA, B.ED GGHSS Chakdara	SS Pashto BS-17 GGHSS Chakdara Dir Lower	Against the vacant post

150.	923	Shehnaz Begum ASDEO Sharqi Hoti Mardan	SS Pashto BS-17 GGHSS Toru Mardan	Against the vacant post
151.	924	Nusrat Jabeen GGHS Palonow Mkd	SS Pashto BS-17 GGHSS Palonow Malakand	Against the vacant post
152.	925	Mst. Najma SST GGHS Waris Khan Killi FR Peshawar	Services placed at the disposal of FATA	Against the vacant post
153.	929	Miss Safia Begum SST (G) GGHSS Utmanzai Chd	SS Pashto BS-17 GGHSS Utmanzai Charsadda	Against the vacant post
154.	934	Jamila Bibi MA , B.ED GGHS Ramora Dir Lower	SS Pashto BS-17 GGHSS Ouch.Dir Lower	Against the vacant post
155.	936	Mst. Farhat Ara SST GGHSS Belzadi Chakar Kot Kohat	SS Pashto BS-17 GGHSS Bezadi Chakar Kot Kohat	Against the vacant post
156.	946	Bakht Shahida MA B.ED GGHS Mian Brangola	SS Pashto BS-17 GGHSS Shawa Dir Lower	Against the vacant post
157.	947	Mst. Nilayat Sultan SST GGHSS No.2 Hoti Mardan	SS Pashto BS-17 GGHSS Kanal Road Mardan	Against the vacant post
158.	963	Shadina Naz MA B.ED GGHS Kityari	SS Pashto BS-17 GGHSS Kityari Dir Lower	Against the vacant post
159.	972	Saceda Begum MA B.ED GGHS Sado Dir Lower	SS Pashto BS-17 GGHSS Sado Dir Lower	Against the vacant post
160.	982	Yasmecn Ghani GGHS Dargai Mkd	SS Pashto BS-17 GGHSS Batkhela Malakand	Against the vacant post
161.	986	Miss Sajida Begum SST (G) GGHS Gandheri Tangi	SS Pashto BS-17 GGHSS Mandani Charsadda	Against the vacant post
162.	987	Miss Tasleem Akhtar SST (G) JICA Model School Umarzai	SS Pashto BS-17 GGHSS Tarnab Farm Peshawar	Against the vacant post
163.	1008	Mst. Naila Afshan SST GGHSS Teri Karak	SS Pashto BS-17 GGHSS Teri Karak	Against the vacant post
164.	1033	Najma Shahid GGHS Tordher Swabi	SS Pashto BS-17 GGHSS Topi Swabi	Against the vacant post
165.	1077	Ahmiat GGMS Maneri Payan Swabi	SS Pashto BS-17 GGHSS Shamansoor Swabi	Against the vacant post
166.	1141	Nargas Ghaffar M.A; M.Ed GGMS All Abad	SS Pashto BS-17 GGHSS Charbagh Swat	Against the vacant post
167.	1159	Bibi Shakeela Akhtar SST (G) GGHS Charsadda	SS Pashto BS-17 GGHSS Chamkani Peshawar	Vice S. No. 358
168.	1169	Mufecda Begum GGHS Yaqubi	SS Pashto BS-17 GGHSS Kalu Khan Swabi	Against the vacant post
169.	1188	Sadia Bibi GGMS Nihar Bangla Mkd	SS Pashto BS-17 GGHSS Haryan Kot Malakand	Against the vacant post
170.	1190	Mst. Anjum Nisa SST GGMS Pewar Kurram Agency	Services placed at the disposal of FATA	Against the vacant post
171.	1265	Najia Kousar MA, B.ED GGMS Tarnow	SS (Pashto) BS-17 GGHSS Badwan Dir Lower	Against the vacant post
172.	1404	Safia Gul GGMS Safrona Swabi	SS Pashto BS-17 GGHSS Dagai Swabi	Against the vacant post
173.	1473	Saima Anjum SST GGHS Islamia Collegiate Peshawar	SS Pashto BS-17 GGHSS Hayatabad Peshawar	Against the vacant post
174.	1514	Shabana GGHS Dargai Mkd	SS Pashto BS-17 GGHSS Palai Mkd	Against the vacant post

5. History-cum-civics

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
175.	496	Mst. Humaira Ulfat SST GGHS Islamia Collegiate Peshawar	SS His-cum-civics BS-17 GGHSS Sufaid Sung Peshawar	Against the vacant post
176.	637	Farhat Tazeen Anwar MA, M.Ed GGCMSS No.1 A/Abad	SS His-cum-Civics BS-17 GGHSS Havelian Abbottabad	Against the vacant post
177.	675	Sofia Noureen/ MA, Med GGHSS Tarnab Form Peshawar	SS His-cum-civics BS-17 GGHSS Aza Khel Bala Nowshera	Against the vacant post
178.	909	Mst. Rahat Mahjabeen SST GGHS No.1 Kohat	SS His-cum-civics BS-17 GGHSS Ustarzai Pavan Kohat	Against the vacant post
179.	1018	Mst. Uzma Naureen SST GGHS Sakhakot Mkd	SS His-cum-civics BS-17 GGHSS Koper Malakand	Against the vacant post
180.	1045	Qudsia Syed MA/M.Ed GGHS Shehala Mansehra	SS His-cum-civics BS-17 GGHSS Phulra Mansehra	Against the vacant post

181.	1131	Nusrat Samreen MA,M.ED GGHS Shore Kot DIK	SS His-cum-civics BS-17 GGHSS Prova DIKhan	Against the vacant post
182.	1207	Mst. Bushra Begum SS (Sc) GGHS Takkar Takht Bhai Mardan	SS His-cum-civics BS-17 GGHSS Gujar Garhi Mardan	Against the vacant post
183.	1246	Nasira Bibi MA Pol.Science GGMS Nawan Killi Nowshera	SS His-cum-civics BS-17 GGHSS Rashakai Nowshera	Against the vacant post
184.	1268	Shahida Khanam GGHSS Chokara Karak	SS His-cum-civics BS-17 GGHSS Chokara Karak	Against the vacant post
185.	1272	Mst. Safia Begum SST GGHS Chowki Mamraiz Nowshera	SS His-cum-civics BS-17 GGHSS No. 2 Pabbi Nowshera	Against the vacant post
186.	1279	Rahela begum GGMS Shamroz abad dagi Swabi	SS His-cum-civics BS-17 GGHSS Dagai Swabi	Against the vacant post
187.	1285	Shagufta Parveen GGHS Yakatoot Peshawar	SS His-cum-civics BS-17 GGHSS Wadpaga Peshawar	Against the vacant post
188.	1398	Musarrat Shaheen GGHSS Topi	SS His-cum-civics BS-17 GGHSS Topi Swabi	Against the vacant post
189.	1405	Rukhsana Saeed GGHS Turlandi	SS His-cum-civics BS-17 GGHSS Shewa Swabi	Against the vacant post
190.	1420	Amina Iqbal, SST (Gen) GGHS, Abba khel Lakki	SS His-cum-civics BS-17 GGHSS Titar Khel Lakki Marwat	Against the vacant post
191.	1426	Ikramia Begum SST GGMS Shoaib Abad Mardan	SS His-cum-civics BS-17 GGHSS Sawal Dher Mardan	Against the vacant post
192.	1451	Latafat Mehreen, SST (Gen), GGMS, Qeemat Manjiwalla Lakki	SS His-cum-civics BS-17 GGHSS Ghazni Khel Lakki	Against the vacant post
193.	1507	Meena Khan MA M.Ed GGHSS Tahir Abad Swat	SS His-cum-Civics BS-17 GGHSS Tahir Abad Swat	Against the vacant post
194.	1510	Mst. Rahila Anwer SST GGHS Baffa Mansehra	SS His-cum-civics BS-17 GGHSS Shinkiani Mansehra	Against the vacant post
195.	1571	Naheed Begum MA, M.Ed GGHS Toot Killi Mardan	SS His-cum-civics BS-17 GGHSS Gujrat Mardan	Against the vacant post
196.	1606	Bibi Aisha SST (G) GGHS Achini Payan	SS His-cum-civics BS-17 GGHSS Aza Khel Payan Nowshera	Against the vacant post
197.	1625	Shazia Ahsan MA, M.Ed/ M.Phil GGMS Tajwal	SS His-cum-civics BS-17 GGHSS Trangri Bala Mansehra	Against the vacant post
198.	1630	Mst. Amria Begum SST GGHSS Kot Mkd	SS His-cum-civics BS-17 GGHSS Kaddi Swabi	Against the vacant post
199.	1634	Tabassum Bibi GGHSS Kot Mkd	SS His-cum-civics BS-17 GGHSS Kot Malakand	Against the vacant post
200.	1670	Asima Hanif SST GGCMS Mandoori Nowshera	SS His-cum-civics BS-17 GGHSS Harichand, Charsadda	Against the vacant post
201.	1671	Mst. Farzana Bibi SST GGHSS Sakhakot Mkd	SS BS-17 GGHSS Sakhakot Malakand	Against the vacant post
202.	1682	Syed Ruqia Bukhari MA/M.Ed GGHSS Panjar Bunir	SS His-cum-civics BS-17 GGHSS Panjar Bunir	Against the vacant post
203.	1699	Nazia Habib MA Pol. Science GGHS, #1 Pabbi	SS His-cum-civics BS-17 GGHSS Badrashi Nowshera	Against the vacant post
204.	1739	Nadia Bibi GGHSS Sakhakot	Inst: RITE (F) Dargai Mkd	Against the vacant post
205.	1742	Mst. Nasima Bibi SST (G) GGHS Reshum Chitral	SS His-cum-civics BS-17 GGHSS Shiakotake Chitral	Against the vacant post
206.	1752	Sabahat Zohra MA, M.Ed GGHS Bakri Banda Mardan	SS His-cum-civics BS-17 GGHSS Ghalldher Mardan	Against the vacant post
207.	1799	Salma Gul MA, M.Ed GGHS Tambulak Mardan	SS His-cum-civics BS-17 GGHSS Katlang Mardan	Against the vacant post
208.	1802	Bibi Saima MA/M.Ed GGHS Moorat Maira	SS His-cum-civics GGHSS No.2 Mansehra	Against the vacant post
209.	1859	Tasleem Bibi MA, B.ED GGHSS Asbanr	SS His-cum-civics BS-17 GGHSS Asbanr Dir Lower	Against the vacant post
210.	1915	Mst. Robina Qureshi GGHSS Gumbat Kohat	SS His-cum-civics BS-17 GGHSS Gumbat Kohat	Against the vacant post
211.	1918	Basria GGHS Yaqubi Swabi	SS His-cum-civics BS-17 GGHSS Zarobi Swabi	Against the vacant post
212.	2263	Mst. Siyam Akbar SST GGHS Achini Payan Peshawar	SS His-cum-civics BS-17 GGHSS Mohib Banda Nowshera	Against the vacant post
213.	2393	Mst. Ishrat Begum SST GGHS Matkani Mkd	SS His-cum-civics BS-17 GGHSS Batkhela Malakand	Against the vacant post

214.	2757	Mst. Aqila SST (G) GGHS Wardaga Charsadda	SS His-cum-civics BS-17 GGHS Mandani Charsadda	Against the vacant post
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6. Pak Study

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
215.	728	Hamida Begum M.Sc M.Ed GGHS No.2 S.Sharif Swat	SS Pak Study BS-17 GGHS Odigram Swat	Against the vacant post
216.	789	Azra Bano MA/MED GGHS Hattar	SS Pak Study BS-17 GGHS Noordi Haripur	Against the vacant post
217.	911	Bushra Qasim M.A;M.Ed GGGS Afsar Abud Swat	SS Pak Study BS-17 GGHS Kala Killi Swat	Against the vacant post
218.	937	Shahnaz Begum M.Sc B.Ed GGHS Amankot Swat	SS Pak Study BS-17 GGHS Charbagh Swat	Against the vacant post
219.	959	Bibi Halima M.A;M.Ed GGMS Kaanju Swat	SS Pak Study BS 17 GGHS Gwalerai Swat	Against the vacant post
220.	1044	Taj Begum, BSc, MSc, MAM.Ed GGHS Tikri Kharari	SS Pak Study BS-17 GGHS Tikri Khararai Battagram	Against the vacant post
221.	1152	Mst. Shahida SST GGHS Sarband Peshawar	SS Pak Study BS-17 GGHS Sufaid Sang Peshawar	Against the vacant post
222.	1164	Tujza Abbasi I/C SDEO (F) Lakki Marwat	SS Pak Study BS-17 GGHS Bangash Khel Bannu	She will actualize her promotion as SS BS-17 & Join the post of SDEO (F) Lakki Marwat
223.	1186	NASIRA KHAN GGMS SAJAN KILI Mardan	SS Pak Study BS-17 GGHS Ghalladher Mardan	Against the vacant post
224.	1217	Mst. Salima Akhtar SST GGHS Safobari Band Charsadda	SS Pak Study BS-17 GGHS Ziam Charsadda	Against the vacant post
225.	1271	Mst. Tahira Yasmin SST GGHS Fattah DIKhan	SS Pak Study BS-17 GGHS Behari Colony DIKhan	Vice S. No. 359
226.	1273	Zainab SST (Science), GGHS No.3, Lakki	SS Pak Study BS-17 GGHS Ghazni Khel Lakki Marwat	Against the vacant post
227.	1313	Bibi Nargis M.Sc, M.Ed GGHS Kass Koroona Mardan	SS Pak Study BS-17 GGHS Gujar Garhi Mardan	Against the vacant post
228.	1324	Mst. Naheed Akbar SST GGHS Samandar Khan Kot NWA	Service placed at the disposal of FATA	Against the vacant post
229.	1332	Naila Tabassum MA P/S GGHS, Nowshera cantt	SS Pak Study BS-17 GGHS Badrashi Nowshera	Against the vacant post
230.	1355	Bibi Bilquis Begum, MSc & MA, Med GGHS Tikri Kharari	SS Pak Study BS-17 GGHS Shinkiarri Mansehra	Against the vacant post
231.	1383	Safia Begum MA, B.Ed GGMS Feroz Pur Mardan	SS Pak study BS-17 GGHS Par Hoti Mardan	Against the vacant post
232.	1406	Mst. Mehrooda Bibi SST (S) GGHS Barenis Chitral	SS Pak Study BS-17 GGHS Shiaqotake Chitral	Against the vacant post
233.	1407	Rubina Bibi SST (G) GGHS Takhti Khurd Mansehra	SS Pak study BS-17 GGHS Takhti Khurd Mansehra	Against the vacant post
234.	1458	Mrs, Zulekha Bibi (MA/Med) GGHS Mullazai Tank	SS Pak Study BS-17 GGHS Mullazai Tank	Against the vacant post
235.	1467	Nasira Parveen MA/B.Ed: GGHS Suratli Killa Karak	SS Pak Study BS-17 GGHS Esak Chuntra Karak	Against the vacant post
236.	1505	Mst. Laila Zeb SST Sc GGHS Warijun Chitral	SS Pak Study BS-17 GGHS Warijun Chitral	Against the vacant post
237.	1513	Naheeda Khan SST GGHS Maulay Khan Kot SWA	Service placed at the disposal of FATA	Against the vacant post
238.	1590	Naheed Akhtar SST Sc GGHS Kuthiala A/Abad	SS BS-17 GGHS Khanpur Haripur	Against the vacant post
239.	1669	Asma Ambreen Msc,M.ED GGHS Babar Pacca	SS Pak Study BS-17 GGHS Draban Kalan DIKhan	Against the vacant post
240.	1692	Mst. Najia Afridi SST GGMS Mir Haider Killay FR Peshawar	Service placed at the disposal of FATA	Against the vacant post
241.	1732	Malka Islam GGHS Shergarh Mardan	SS Pak study BS-17 GGHS Ikram Pur Mardan	Against the vacant post

242.	1743	Niggar Tabasum M.sc.M.ED GGHSS Kulachi	SS Pak Study BS-17 GGHSS Kulachi DIKhan	Against the vacant post
243.	1771	Miss Seema Gul SST (G) GGHS Jamrooz Khan Killi Chd	SS Pak Study BS-17 GGHSS Mandani Charsadda	Against the vacant post
244.	1800	Alia Muslim SST GGCMS Karim Abad	SS Pak Study BS-17 GGHSS Alo Mardan	Against the vacant post
245.	1814	Shahnaz Begum SST GGMS Sanazo Shah Charsadda	SS Pak Study BS-17 GGHSS Koper Malakand	Against the vacant post
246.	1843	Shehla Badar SST GGHSS Fateh DIKhan	SS Pak Study BS-17 GGHSS Mitha Pur DI Khan	Against the vacant post
247.	1863	Safia Rehana Iqbal GGHS Rangpur Shumali	SS Pak Study BS-17 GGHSS Paharpur DIKhan	Against the vacant post
248.	1874	Anwar Begum, SST (Science), GGHS No.4, Khoidad Khel	SS Pak Study BS-17 GGHSS Nar Shukrullah Bannu	Against the vacant post
249.	1914	Mst. Safia SST GGHS Rajjar Charsadda	SS Pak Study BS-17 GGHSS Harichand Charsadda	Against the vacant post
250.	2334	Sadaf Mohib SST GGMS No.1 Peshawar Cantt:	SS Pak Study BS-17 GGHSS Tarnab Farm Peshawar	Against the vacant post
251.	2363	Lubna Tauheed SST GGHSS Shahbaz Ghari Mardan	SS Pak Study BS-17 GGHSS Shahbaz Ghari Mardan	Against the vacant post
252.	2379	Uroosa Naufame SST GGHS Khano Khel DIKhan	SS Pak Study BS-17 GGHSS Fazli Rahim Colony D.I.Khan	Against the vacant post
253.	2443	Mst. Haleema Farooq SST GGHS Marghuz Swabi	SS Pak Study BS-17 GGHSS Zarobi Swabi	Against the vacant post
254.	3224	Mst. Shabana Khan SST GGHS Jalandar Khan Kot SWA	Service placed at the disposal of FATA	Against the vacant post

7. Home Economics

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
255.	1448	Farzana Yasmeen GGHS Esak Chountra Karak	SS Home Economics BS-17 GGHSS Esak Chountra Karak	Against the vacant post

8. Economies

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
256.	663	Bushra Khatoon MA, M.Ed GGCMSS No.1 A/Abad	SS Economics BS-17 GGHSS Sherwan Abbottabad	Against the vacant post
257.	1109	Dure Shawar SST GGHS No.2 A/Abad	SS Economics BS-17 GGHSS Lora Abbottabad	Against the vacant post
258.	1233	Najiya Shakir M.Phil, M.Ed GGHS Baghdada Mardan	SS Economics BS-17 GGHSS Toru Mardan	Against the vacant post
259.	1315	Mst. Syeda Irum Sultana SST (G) GGHSS Sard China Swabi	SS Economics BS-17 GGHSS Rustam Khel Mardan	Against the vacant post
260.	1371	NADIA AHMAD GGHS KHAZANA DHERI Mardan	SS Economics BS-17 GGHSS Jandar Par Mardan	Against the vacant post
261.	1379	Safia Sultan MA/MED GGHS Dehdan Haripur	SS Economics BS-17 GGHSS Bandi Muncem Haripur	Against the vacant post
262.	1401	Samina Shahzadi MA/M.Ed GGHS Dhodial Mansehra	SS Economics BS-17 GGHSS Behali Mansehra	Against the vacant post
263.	1479	Sultana Bibi MA/ M.Ed GGCMS Chairah Manshra	SS Economics BS-17 GGHSS Shergarh Manshra	Against the vacant post
264.	1529	Sadaf Quratulhain MA/M.Ed GGMS Sanda Sar	SS Economics BS-17 GGHSS Phulra Mansehra	Against the vacant post
265.	1620	Jehad GGHS Sard Cheena Swabi	SS Economics BS-17 GGHSS Shawa Swabi	Against the vacant post
266.	1628	Afshien Faruh GGHS Tordher Swabi	SS Economics BS-17 GGHSS Shahmansoor Swabi	Against the vacant post
267.	1639	Miss Ambareen Majeed SST (G) GGMS Hikmat Abad	SS Economics GGHSS Harichand Charsadda	Against the vacant post
268.	1647	Shazia Noreen MA/MED GGHSS KTS S.No.2	SS Economics BS-17 GGHSS Noordi Haripur	Against the vacant post
269.	1663	Mst. Najma Haq SST GGHS Kot Baba Tangi Chd	SS Economics GGHSS Sherpao Charsadda	Against the vacant post

270.	1683	Nazira GGHS Garangdara Mkd	SS Economics BS-17 GGHS Palai Malakand	Against the vacant post
271.	1711	Gul Naz MA/M.Ed GGHSS Khawari Manshra	SS Economics BS-17 GGHS Tarawara Manshra	Against the vacant post
272.	1765	Saira Naz Khattak GGHS Chokara Karak	SS Economics BS-17 GGHS Chokara Karak	Against the vacant post
273.	1807	Sadaf Iqbal SST GGCMS Lakki Ghundaki Karak	SS Economics BS-17 GGHS Esak Chountra Karak	Against the vacant post
274.	1847	Mst. Salma Saddiq SST GGHS Ghalanai Moh: Agency	Service placed at the disposal of FATA	Against the vacant post
275.	1878	Barsila Zaib MA/M.Ed GGHS Murad Pur Manshra	SS Economics BS-17 GGHS Oghi Manshra	Against the vacant post
276.	1929	Seema Mujahid SST GGMS Mandori Mardan	SS Economics BS-17 GGHS Takhtbhai Mardan	Against the vacant post
277.	2370	Mst. Farkhanda Jabeen SST (G) GGHS Moldeh Chitral	SS Economics BS-17 GGHS Shaikotake Chitral	Against the vacant post
278.	2411	Rehana Afzal SST GGMS Wanda Mochianwala DIKhan	SS Economics BS-17 GGHS Paroa, D.I.Khan	Against the vacant post
279.	2512	Mst. Saima Ali SST (G) GGHS Malogo Peshawar	SS Economics BS-17 GGHS Aza Khel Payan Nowshera	Against the vacant post
280.	2527	Mst. Sadia Azdi SST GGHS Fazal Rahim Colony DIKhan	SS Economics BS-17 GGHS Miitha Pur DIKhan	Against the vacant post
281.	2669	Mst. Sarwat SST (G) GGHS Kot Baba Tangi Charsadda	SS Economics BS-17 GGHS Umerzai Charsadda	Against the vacant post
282.	3172	Mst. Asia Ashfaq SST (G) GGHS Qaid Abad Peshawar	SS Economics BS-17 GGHS Sufaid Sung Peshawar	Against the vacant post

9. Statistics

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
283.	1781	Shawana Nawaz Hashmi GGMS Segri Matwala Shah DIKhan	SS Statistics BS-17 GGHS Paharpur D.I.Khan	Against the vacant post
284.	2620	Sadia Irum MSc B.Ed GGHS Yakatoot Peshawar	SS Statistics BS-17 GGHS Sufaid Sung Peshawar	Against the vacant post

10. Maths

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
285.	1126	Mst. Niamat Ara Qureshi SST GGHS Comp: Peshawar	SS Maths BS-17 GGHS Lady Grift Peshawar	Against the vacant post
286.	1455	Zahida Parveen M.Sc./M.Ed: GGHS Ahmad Abad Karak	SS Maths BS-17 GGHS Chokara Karak	Against the vacant post
287.	1524	Aisha Noreen MSC/MED GGHS Noordi	SS Maths BS-17 GGHS Noordi Haripur	Against the vacant post
288.	1612	Sadia Noman MSC/MED GGHS Ghazi Hamlet	SS Maths BS-17 GGHS Topi Swabi	Against the vacant post
289.	1717	Fozia Faiz M.sc ,M.ED GGMS Potah DIKhan	SS Maths BS-17 GGHS Methapur DIKhan	Against the vacant post
290.	1748	QANDEEL-E-AYESHA WAHEED BS-16 PITE Peshawar	SS Maths BS-17 GGHS Kiri Raiiki A/Abad	Against the vacant post
291.	1854	Nadia Naz M.Sc, M.Ed GGHS Baghicha Dheri Mardan	SS Maths BS-17 GGHS Baghicha Dheri Mardan	Against the vacant post
292.	1876	Asma Anjum MA, M.Ed GGCMS No.1 A/Abad	SS GGCHSS Abbottabad	Against the vacant post in her own pay & scale
293.	1886	Kaloom Bibi SST MSC MED GGHS KTS S.No.1	SS Maths BS-17 GGHS Bandi Muncem Haripur	Against the vacant post
294.	2006	Mst. Nazia Begum SST (Sc) GGHS Rajjar Charsadda	SS Maths BS-17 GGHS Turangzai Charsadda	Against the vacant post

11. Physics

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
295.	1266	Nadia Majeed MSC Physics GGHS, Azakhel Payan	SS Physics BS-17 GGHS Aza Khel Payan Nowshera	Against the vacant post
296.	1865	Bibi Rabia M.Sc B.Ed GGHS Matta	SS Physics BS-17 GGHS Charbagh Swat	Against the vacant post

12. Chemistry

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
297.	578	Noreen Maroof GGHS Malikpura	SS Chemistry BS-17 GGHS Sherwan Abbottabad	Against the vacant post
298.	587	Mst. Rabiah Baby SST (Sc) GGHS No.1 Kohat	SS BS-17 GGHS Jungle Khel Kohat	Against the vacant post
299.	794	Farzana Manzoor SST MSC BED GGHS Mang	SS Chemistry BS-17 GGHS Panian Haripur	Against the vacant post
300.	855	Mst. Rizwana Akhtar SST (Sc) GGMS Chiga Lar FR Lakki	Service placed at the disposal of FATA	Against the vacant post
301.	901	Rizwana Ishrat MSC/MED GGHS Hattar	SS Chemistry BS-17 GGHS Hattar Haripur	Against the vacant post
302.	902	Shabana Iqbal MSc/ Chemistry GGHS Noordi	SS Chemistry BS-17 GGHS Chapra Haripur	Against the vacant post
303.	942	Musarat M.Sc.BEdGGHS Husain Ahingaro dherai	SS Chemistry BS-17 GGHS Odigram Swat	Against the vacant post
304.	1001	Shamim Akhtar SST MSC /M.Phil Edu. CGMGHS Haripur	SS Chemistry BS-17 GGHS Noordi Haripur	Against the vacant post
305.	1073	Rozia Bibi GGHS Gulshan Abad Swabi	SS Chemistry BS-17 GGHS Gulshan Abad	Against the vacant post
306.	1229	Shaista Jabeen GGHS Nawanshar A/Abad	SS Chemistry BS-17 GGHS Kari Raiki Abbottabad	Against the vacant post
307.	1245	Saima Rahim GGHS Khurram Karak	SS Chemistry BS-17 GGHS Dömel Bannu	Against the vacant post
308.	1251	Nadia Bibi GGHS SHAMSHAD ABAD Mardan	SS Chemistry BS-17 GGHS Sokai Mardan	Against the vacant post
309.	1283	Mst. Naheed Bibi SST GGHS Sultanpur A/Abad	SS Chemistry BS-17 GGHS Lora Abbottabad	Against the vacant post
310.	1289	Riffat Parveen/ MA, M.Sc Med GGHS Mohmandabad	SS Chemistry BS-17 GGHS Chamkani Peshawar	Against the vacant post
311.	1290	Umme Kalsoom GGHS Bamkhal Swabi	SS Chemistry BS-17 GGHS Baja Swabi	Against the vacant post
312.	1294	Nelofar M.Sc M.ed GGHS Qandil Swat	SS Chemistry BS-17 GGHS Fatehpur Swat	Against the vacant post

13. Biology

S#	Senty: list No.	Name of Officer and School Address	Proposed place of Posting	Remarks
313.	826	Shazadi Nadia Safdar MSC/MED GGHS Chapra	SS Biology BS-17 GGHS Hajja Gali A/Abad	Against the vacant post
314.	1066	Farzana Shafi GGHS Rajoya	SS Biology BS-17 GGHS Garhi Phulgram Abbottabad	Against the vacant post
315.	1172	Zaibun Nisa M.Sc B.Ed GGHS Barikot	SS Biology BS-17 GGHS Odigram Swat	Against the vacant post
316.	1236	Romana Aslam SST (Sc) GGHS Hayatabad Peshawar	SS Biology BS-17 GGHS Sufaid Sung Peshawar	Against the vacant post
317.	1239	Shehla Sarwar SST (Sc) GGHS Qasab Khana Peshawar	SS Biology GGHS Comp: Peshawar	Against the vacant post
318.	1249	Miss Amina Khan SST (G) GGHS Shabqadar Fort	SS Biology BS-17 GGHS Havelian Abbottabad	Against the vacant post
319.	1288	Zahida Bibi M.Sc Botany GGHS, #1 Pabbi	SS Biology BS-17 GGHS, No.2 Pabbi Nowshera	Against the vacant post
320.	1292	Saima Sultan/ MSc,Med GGHS Nishtarabad	SS Biology BS-17 GGHS Badber Peshawar	Against the vacant post

321.	1295	Robina M.Sc M.Ed GGHS Panr Swat	SS Biology BS-17 GGHS Totano Banda Swat	Against the vacant post
322.	1297	Shakira Aziz GGCMHSS Canal Road Mardan	SS Biology BS-17 GGHS Ghala Dher Mardan	Against the vacant post
323.	1309	Rafaqat Ara MSC Botny GGHS, Shaidu	SS Biology BS-17 GGHS Shaidu Nowshera	Against the vacant post
324.	1318	Neelam MSc,M.Ed GGHS Jamal Garhi Mardan	SS Biology BS-17 GGHS Jandhar Par Mardan	Against the vacant post
325.	1427	Bushra Jehan GGHS Ghundi Killa Karak	SS Biology BS-17 GGHS Terri Karak	Against the vacant post
326.	1432	Sajida GGHS Ghundi Killa Karak	SS Biology BS-17 GGHS Esak Chountra Karak	Against the vacant post
327.	1469	Rahat Maheen, SST (Science), GGHS, Dalo Khel Lakki	SS Biology BS-17 GGHS Titter Khel Lakki Marwat	Against the vacant post
328.	1501	Gul Naz GGHS Kalu Khan Swabi	SS Biology BS-17 GGHS Shewa Swabi	Against the vacant post
329.	1547	Mst Khadija Bibi SST Gen: GGHS Broze Chitral	SS Biology BS-17 GGHS Sheyaqotak Chitral	Against the vacant post
330.	1595	Uzma Zeb MA/M.Ed GGHS No.2 Mansehra	SS Biology BS-17 GGHS Shinkiari Mansehra	Against the vacant post
331.	1629	Amina Khatoon M.Sc M.Ed GGHS Kabal Swat	SS Biology BS-17 GGHS Kala Kallay Swat	Against the vacant post
332.	1652	Zeenat Jehan MSc, B.Ed, M.Ed GGHS Takht Bhai	SS Biology BS-17 GGHS Parkho Dheri Mardan	Against the vacant post
333.	1688	Mst. Ishrat Farid SST (Sc) GGHS Saidu Sharif Swat	SS Biology BS-17 GGHS Odigram Swat	Against the vacant post
334.	1698	Tabassum Naz MSc GGHS Sawal Dher	SS Biology BS-17 GGHS Shahbaz Garhi Mardan	Against the vacant post
335.	1720	Hajira Bibi MSc/ MED GGHS Sangian	SS Biology BS-17 GGHS Lora Abbottabad	Against the vacant post
336.	1723	Miss Jamila Salah Uddin SST (Sc Biology)GGHS Behlola Charsadda	SS Biology BS-17 GGHS Dhakki Charsadda	Against the vacant post
337.	1749	RAISA NAZ GGCMS HAMZA DHER Swabi	SS Biology BS-17 GGHS Dagai Swabi	Against the vacant post
338.	1767	SALMA NAZ GGHS MADI BABA Mardan	SS Biology BS-17 GGHS Takht Bhai Mardan	Against the vacant post
339.	1770	Samra Bibi MSC/MED GGHS Mang	SS Biology BS-17 GGHS	Against the vacant post
340.	1772	Secma Rani GGHS Ghumawan	SS Biology BS-17 GGHS Rich Bhen Abbottabad	Against the vacant post
341.	1819	Sharafat MSc, B.Ed, M.Ed GGCMHSS Katlang	SS Biology BS-17 GGHS Baghicha Dheri Mardan	Against the vacant post
342.	1829	Shamsun Nihar GGHS Ganderi Khattak Karak	SS Biology BS-17 GGHS Lachi Kohat	Against the vacant post
343.	1852	Bibi Amina GGHS Sard Cheena	SS Biology BS-17 GGHS Gulshanabad Manerai Pawan Swabi	Against the vacant post
344.	1862	Bayina MSc, B.Ed GGCMHSS Katlang	SS Biology BS-17 GGHS Kati Garhi Mardan	Against the vacant post
345.	1888	Lubna Siraj M.Sc M.Ed GGHS No.1 Mingora	SS Biology BS-17 GGHS Fatch Pur Swat	Against the vacant post
346.	1910	Akhtar M.sc,M.EDGGMS Munir Khaki DIKhan	SS Biology BS-17 GGHS No.9 DIKhan	Against the vacant post
347.	1997	Naveeda Tariq SST (Sc) GGHS Jogiwara Peshawar	SS Biology BS-17 GGHS Jogiwara Peshawar	Against the vacant post
348.	2017	Mst. Sadia Bibi SST (Sc) GGHS Asbanr Dir Lower	SS Biology BS-17 GGHS Asbanr Dir Lower	Against the vacant post
349.	2032	Mst. Bushra Saleem SST (Sc) GGCMHSS Haripur	SS Biology BS-17 GGHS Sherwan Abbottabad	Against the vacant post
350.	2047	Mst. Sara Ihsan SST GGHS Zarbab Garhi Charsadda	SS Biology BS-17 GGHS Turangzai Charsadda	Against the vacant post
351.	2048	Mst. Saira Faiz SST GGHS Wadpaga Peshawar	SS Biology BS-17 GGHS Khyber Colony Peshawar	Against the vacant post
352.	2097	Mst. Nosheen Khan SST GGHS Shahdara Swat	SS Biology BS-17 GGHS Gwalera Swat	Against the vacant post
353.	2184	Nosheen Bibi SST GGHS	SS Biology BS-17 GGHS Misri	Against the vacant post

		Manki Swabi	Banda Nowshera	post
354.	2213	Mst. Robina Nazli SST GGHSS Sambat Swat	SS Biology BS-17 GGHSS Matta Swat	Against the vacant post
355.	2236	Mst. Parveen Nisa SST (Sc) GGHSS Kalpani Bunir	SS Biology BS-17 GGHSS Kalpani Bunir	Against the vacant post

Consequential Posting/Transfer

S#	Name of Officer and School Address	Proposed place of Posting	Remarks
356.	Mst. Zahida Jabeen HM working as SS Urdu GGHSS No. 2 Peshawar Cantt:	SS Urdu BS-17GGHSS Aza Khel Payan Nowshera	Against Vacant Post
357.	Mst. Sabiha Begum SS Islamiyat GGHSS Paroa DIKhan (Belongs to Kohat)	Instructor RITE (F) Kohat	Against Vacant Post. In her own pay & scale
358.	Mst. Askara Bibi SS Pashto GGHSS Chamkani Peshawar	SS Pashto BS-17 GGHSS Sufaid Sang Peshawar	Against Vacant Post
359.	Mst. Sabiha Ihsan MA (Political Science) working as SS Pak Study, GGHSS Bihari Colony DIKhan	SS His-cum-civics BS-17 GGHSS Bihari Colony DIKhan	Against Vacant Post
360.	Mst. Rakhshanda Mehndi, SS English, GGHSS No. 2 Peshawar Cantt:	SS English BS-17, GGHSS University Town Peshawar	Against Vacant Post

2. On their promotion, the Subject Specialist concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No. TA /DA allowed.

SECRETARY

Endst. No. & date as above.

Copy to:

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification on E&SE Department website (www.kpese.gov.pk)
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Subject Specialist concerned.
15. Office File.

aik

(NAIK MUHAMMAD)
SECTION OFFICER (PRIMARY)



Annexure D (19)

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

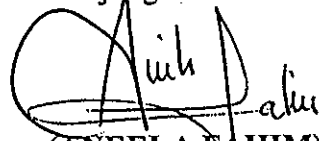
No. SO(S/F)E&SED/4-16/2018/Appeal/Mst. Nusrat Jabeen/SDEO
Dated Peshawar the April 11th, 2018

To

Mst. Nusrat Jabeen (BS-17),
Ex-SDEO (Female) Takht Bhai Mardan,
Now SDEO (Female) Katlang Mardan.

**SUBJECT: CANCELLATION OF TRANSFER ORDER/ RETENTION AS SDEO (FEMALE)
TAKHT BHAI MARDAN**

I am directed to refer to your appeal dated 02-04-2018 on the subject noted above and to intimate that the Competent Authority has regretted your appeal on the ground that incumbent officer is from Management Cadre and the instant appeal is against the spirit of High Court judgment delivered in Hafiz Ibrahim case.

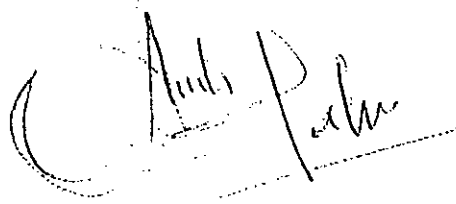

(ANEELA FAHIM)
SECTION OFFICER (S/F)

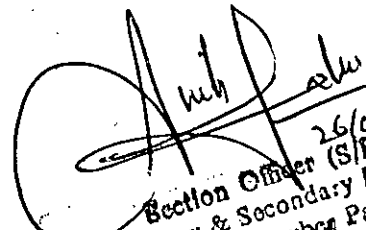
Endst: of even No. & Date:

Copy forwarded to the:

1. PS to Secretary, E&SE Department.
2. PS to Special Secretary, E&SE Department.


SECTION OFFICER (S/F)




26/04/18
Section Officer (S/F)
Elementary & Secondary Education
Deptt; Govt of Khyber Pakhtunkhwa

"accepted"

12

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 575/2018

Nusrat Jabeen SDEO(Female) District Mardan.

....Appellant.

VERSUS

Secretary (E&SE)Department, Khyber Pakhtunkhwa & others.

.....Respondents

JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No:1-2.

Respectfully Sheweth :-

The Respondents submit as under :-

PRELEMENARY OBJECTIONS .

- 1 That the appellant has got no cause of action/locus standi .
- 2 That the instant Service Appeal is badly time barred.
- 3 That the appellant has concealed material facts from this Tribunal in the instant appeal.
- 4 That the instant Appeal is based on mala-fide intentions.
- 5 That the appellant has not come to this Tribunal with clean hands.
- 6 That the appellant is not entitled for the relief she has sought from this Honorable Tribunal.
- 7 That the instant Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is not maintainable in its present form.
- 9 That the instant Appeal is bad for mis-joinder & non joinder of the necessary parties.
- 10 That the instant Appeal is barred by law.
- 11 That the appellant is not competent to file the instant appeal against the Respondents.
- 12 That the impugned transfer orders dated 30/3/2018 & 11/4/2018 of the Respondent No: 1, are legally competent & liable to be maintained in favour of the Respondents.
- 13 That the appellant is liable to serve against the said post anywhere in the Province.
- 14 That the Respondent Department is empowered to transfer & Post a civil servant under the mandatory provisions of Section-10 of Civil Servants Act: 1973.

15 That the rejection of Departmental Appeal vides dated 30/3/2018 against the impugned Notification dated 11/4/2018 in based on the merits of the case.

ON FACTS

- 1 That Para-1 needs no comments, being pertains to the Service Record of the Appellant.
- 2 That Para-2 is correct to the extent that the appellant is a bona-fide employee of E&SE Department & is serving the Respondent against the SS/SDEO (F) Post in BPS-17 at Takht Bhai, District Mardan & has been transferred to Katlung District Mardan against the SDEO(F) Post vide the impugned Notification dated 30/3/2018 by the Respondent No: 1 under the provisions of Section-10 of Civil Servants Act 1973. It is further note worthy to mentioned here that the appellant is basically hails Teaching Cadre & was serving at GGHSS Mohib Banda District Nowshera against the SS Post. **(Copy of the impugned Notification dated 30/3/2018 is attached as annexure-A).**
- 3 That Para-3 needs no comments as each & every Civil Servant falling under the provision of Sections-2(b) & 10 of Civil Servants Act 1973 is liable to obey the legal orders of the competent authority.
- 4 That Para-4 is correct that vide the impugned Notification date 30/3/2018, the services of the appellant have been placed against the SDEO(F) BPS-17 Post at Katlung, District Mardan under the above cited provisions of law which is also falling within the Administrative domain of the DEO(F) Mardan. Hence, the stand of the appellant regarding faraway & hard area of Katlung is baseless & without any soiled proof & justification.
- 5 That Para-5 is correct. The appellant has filed a Departmental Appeal to the Respondent No: 1 against her transfer Notification dated 30/3/2018 to a wrong forum but again, the said Departmental Appeal has been rejected vide the Notification/order dated 11/4/2018 on merits of the case. Hence, the impugned Notification dated 30/3/2018 has got finality against the appellant in all respect. **(Copy of the rejection order dated 11/4/2018 is annexure-B).**
- 6 That Para-6 is also incorrect & denied on the grounds that the impugned orders dated 30/3/2018 & 11/4/2018 are within legal parameter & liable to be maintained. Hence, the Respondents No: 1-2 further submit on the following grounds inter alia:-

GROUND.

- A Incorrect & denied. The impugned Notification dated 30/3/2018 is within legal sphere & is liable to be maintained in favorable of the Respondent Department in the interest of justice.
- B Incorrect & misleading. The statement of the appellant is baseless & without any cogent reason & justification on the grounds that when the appellant has transferred & adjusted against the SDEO (F) BPS-17 Post at Takht Bhai, District Mardan vide Notification dated 05/01/2018, then she has willingly accepted the said order & no Departmental Appeal has been filed by her to the appropriate authority for the cancellation of the said order dated 05/01/2018. But when the same authority has issued the impugned order dated 30/3/2018 vide which the appellant has been posted against the SDEO(F) BPS-17 Post in the same District, now she has challenged the impugned order dated 30/3/2018 on mala-fide intentions just to stick to the post & station of her choice in the Respondent Department.


- C Incorrect & denied. The competent authority is empowered to transfer & post the appellant anywhere in the Province wherever her services are required to the competent authority having no question of tenure as agitated by the appellant.
- D Incorrect & denied. The Post of the SDEO (F) B-17 is a Management Cadre whom the appellant has willingly accepted. Hence, she can be transferred & posted anywhere in the Province like other SDEOs (Female) in the Khyber Pakhtunkhwa having no question of tenure completion by the appellant.
- E Incorrect & not admitted. The Post of SDEO (F) BPS-17 has been accepted by the appellant on her own sweet will as against her original post of subject Specialist (B-17) is now liable to serve anywhere in the Province as & when the competent authority desires so.
- F Incorrect & misleading. The posting of a Management Cadre official like SDEO (F) BPS-17 is out of the ambit of the transfer posting policy. Hence, the appellant is liable to serve the Respondent Department anywhere in the Khyber Pakhtunkhwa of being a Provincial Management Cadre Post in the Respondent Department. Therefore, the plea of the appellant is baseless.
- G Incorrect & misleading.. Both stations of Takht Bhai & Katlung are in District Mardan. Hence, both stations are quiet accessible for the appellant.
- H Needs no comments. However, it will be in the interest of justice, equity & fair play if this Honorable Tribunal may kindly be pleased to maintain the impugned orders dated 30/3/2018 & 11/4/2018 in favour of the Respondent Department with the additional request for the submission of additional record & case law at the time of arguments, please.

In view of the above made submissions, it is most humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.

Dated ____ / ____ /2018.


Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


Director
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent 2)

AFFIDAVIT

I, Hameedur Rehman Asstt: Director (Litigation-II) E&SE Department do hereby solemnly affirm and declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.


Deponent



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the March 30th, 2018.

NOTIFICATION

NO.SO(SM) E&SED/2-1/2018/Posting/Transfer of DEO, DDEO & SDEOs:

Consequent upon the recommendation of the Placement Committee made in its meetings held on 20-03-2018, posting/transfers of the following, DEOs, DDEOs, SDEOs & HM are hereby ordered on the posts/ stations as mentioned against their names in the interest of public service with immediate effect:

S.#	Name, Designation & Present station	Transferred As	Remarks
1.	Mst. Naghmana Sardar (BS-18) (Management Cadre) (Awaiting posting)	DEO (Female) (BS-19) Nowshera (OPS)	Vice Sr. No.2
2.	Mr. Zulfiqar Ul Mulk (BS-18) DDEO (Female) Nowshera with additional charge of DEO (Female) Nowshera (Management Cadre)	Deputy Director (P&D) Directorate of E&SED	Vice Sr. No.3
3.	Mr. Naveed Akhtar, BS-18 Deputy Director (P&D) Directorate of E&SE	Services placed at the disposal of Directorate of E&SE KP	---
4.	Mst. Azra Bibi (BS-18) DEO (F) Tank (Management Cadre)	Services placed at the disposal of Directorate of E&SE KP	Charge of DEO (F) Tank assigned to DEO (M) Tank
5.	Mr. Fazle Wahid, (BS-17) SDEO (Male) Rajjar Swabi (Management Cadre)	Assistant Director, Directorate of E&SE KP	Vice Sr. No.6
6.	Mr. Liaqat Ali, (BS-17) Assistant Director, Directorate of E&SE KP (Management Cadre)	Assistant Director (Exams) at PITE Peshawar	Against vacant post
7.	Mr. Abdur Rauf, SS (Urdu) BS-17 GHSS Nogram Khudukhel Buner (Teaching Cadre)	SDEO (Male) (BS-17) Khudukhel Buner	-do-
8.	Mst. Tahira Gohar (BS-16) ASDEO Circle Sher Ghar Oghi (Teaching Cadre)	SDEO (Female) (BS-17) Oghi Mansehra (OPS)	-do-

Attested



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

9.	Mst. Shahida Parveen, (BS-17) SDEO (Femle) Prova D.I. Khan (Management Cadre)	Services placed at the disposal of Directorate of E&SE KP	---
10	Mst. Zahida Qayum, HM BS-17 Qandil Swat (Teaching Cadre)	SDEO (Female) (BS-17) Matta Swat	Against vacant post
11	Mr. Azhar Iqbal, HM (BS-17) working as Principal (BS-19) at GCMHS Alpuri, Shangla (Teaching Cadre)	HM (BS-17) GHS Kass Lilownai, Shangla	-do-
12	Mr. Mujahid Hussain Shah, (BS-17) SDEO (Male) Dassu Kohistan (Teaching Cadre)	HM (BS-17) GHS Kasala, Abbottabad	-do-
13	Mr. Fazal Qayyum, SS (Pushto) (BS-17) GHSS Lonkoh, Swat (Teaching Cadre)	SDEO (Male) (BS-17) Dassu, Kohistan	Vice Sr. No.12
14	Mst. Nusrat Jabeen (BS-17) SDEO (F) Takhtbai Mardan	SDEO (F) Katlang Mardan	Against vacant post
15	Mst. Rukhsana Rahim, (BS-17) SDEO (F) Topi Swabi	SDEO (F) Takhtbai Mardan	Vice Sr. No.14

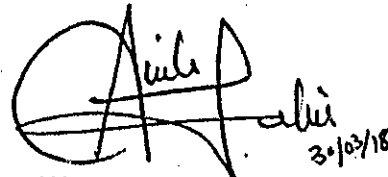
2. No TA/DA is allowed.

SECRETARY

Endst: of even No. & Date.

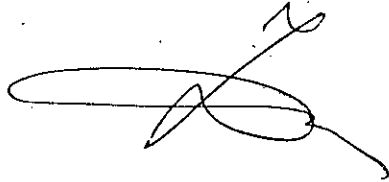
Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (M/F), Concerned.
4. District Account Officers, Concerned.
5. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
6. PA to Additional Secretary E&SED, Khyber Pakhtunkhwa.
7. Incharge EMIS E&SE Department.
8. Officers concerned.
9. Office order file.


30/10/18

(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS M/F)





BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....Appellant

V E R S U S

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....Respondents

REJOINDER/REPLICATION IN
RESPECT OF JOINT PARAWISE
COMMENTS SUBMITTED FOR AND
BY RESPONDENTS NO.1 & 2.

Respectfully Sheweth:

Reply as to preliminary objections:

1. That Objection No.1 is incorrect the appellant has got a cause of action and locus standi to file the present appeal.
2. That Objection No.2 is incorrect the appeal is properly with in time.
3. That Objection No.3 is totally incorrect.

4. That Objection No.4 to 10 are totally incorrect and baseless the appeal of the appellant is according to law and this Hon'ble Tribunal has got the power and jurisdiction to entertain the same.
5. That Objection No.11 to 13 are incorrect the appellant is competent and entitled to file the present appeal furthermore the order dated 30.03.2018 & order dated 11.04.2018 are based on malafide and the result of political influence therefore, are liable to be struck down.
6. That Objection No.14 & 15 are incorrect and the transfer order dated 30.03.2018 is based on malafide.

REPLY ON FACTS:

1. That Para No.1 to 5 are correct however the appellant accepted the transfer order dated 05.01.2018 and took over the charge under serious objections, strong protest, and also to avoid to face the hardships of the litigation but hardly within three months i.e on 30.03.2018 the appellant was again transferred from Takht Bhai to Katlang which is based on malafide and is the result of political influence. It is apparently victimization, mis use of power and authority, discrimination, violation of the constitutional provisions regarding protection, security and safety of fundamental, legal and vested rights.
2. That Para No.6 is incorrect both the orders are based on malafide and are liable to be set aside.

GROUNDS:

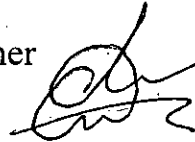
- A. That Comments/Reply of Ground "A" is incorrect the transfer order is against the law, facts and procedure and is liable to be set aside.
- B. Comments/Reply to ground B is incorrect and misleading the order dated 30.03.2018 is the result of misuse of power and authority and is based on malafide, the appellant has been transferred before the completion of her tenure/period, hence, the impugned order was/is void ab-intio.
- C. Comments/Reply to Ground C are incorrect and denied, the impugned order is arbitrary, harsh, without lawful authority and jurisdiction.
- D. Comments/Reply to Ground D are incorrect & denied. The impugned order is against the rules^{of} on the face of it is without rational basis, substance, and backing of any contemporaneous law of the country, therefore, the order in question has been issued to accommodate the respondent No.3 as per her sweet will and desire because of political influence.
- E. Comments/Reply to grounds E & F are incorrect and denied the impugned order is nullity in the eyes of law and violation of the judgments of Superior Courts on the subject.
- F. Comments/Reply to Ground G is incorrect and misleading the appellant has been transferred under political influence just to accommodate Respondent No.3 against the post.

G. In Reply to Ground H it is stated that both the orders dated 30.03.2018 and order dated 11.04.2018 are without lawful authority and based on malafide, therefore, are liable to be set aside.

In view of the above it is submitted that on acceptance of the Rejoinder/Replication the appeal of the appellant may please be accepted in accordance with law.

Through

Petitioner



(Salim Raza Safi
Advocate High Court
Peshawar
Cell#

Date: 10/09/2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....Appellant

VERSUS

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....Respondents

AFFIDAVIT

I, Nusrat Jabeen (BS-17) SDEO (F) Takht Bhai, Mardan, do hereby
solemnly affirm and declare on oath that the contents of the **Rejoinder** are
true and correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Court.

Identified by

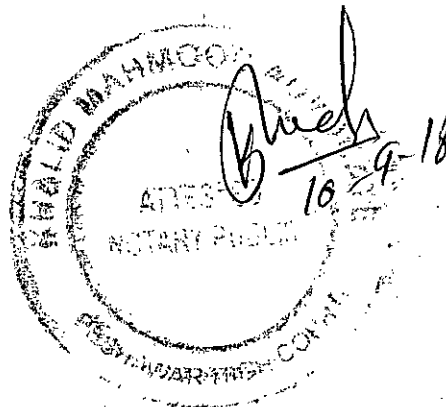


(Salim Raza Safi)
Advocate, Peshawar



DEPONENT

CNIC#



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....Appellant

V E R S U S

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....Respondents

REJOINDER/REPLICATION IN RESPECT
OF PARAWISE COMMENTS SUBMITTED
BY RESPONDENT NO.3.

Respectfully Sheweth:

Reply as to preliminary objections:

1. That Objection No.1 is incorrect the appellant has got a cause of action and locus standi to file the present appeal.
2. That Objection No.2 is incorrect the appeal is maintainable.
3. That Objection No.3 is totally incorrect, the appellant has been transferred under political influence just to accommodate Respondent No.3.

4. That Objection No.4 to 7 are totally incorrect and baseless the appeal of the appellant is according to law and this Hon'ble Tribunal has got the power and jurisdiction to entertain the same.

REPLY ON FACTS:

A. Reply to Para A needs no comments at this stage.

B. Reply to Para B is incorrect the appeal is liable to be allowed.

1. That Reply to Para No.1 to 5 are incorrect however the appellant accepted the transfer order dated 05.10.2018 and took over the charge under serious objections, strong protest, and also to avoid to face the hardships of the litigation but hardly within three months i.e on 30.03.2018 the appellant was again transferred from Takht Bhai to Katlang which is based on malafide and is the result of political influence. It is apparently victimization, mis use of power and authority, discrimination, violation of the constitutional provisions regarding protection, security and safety of fundamental legal and vested rights and the order dated 30.03.2018 has been passed malafidely just to accommodate Respondent No.3 as per his sweet will and desire because of political influence.
2. That Para No.6 is incorrect both the orders are based on malafide and are liable to be set aside.

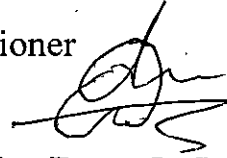
GROUNDS:

- H. That Comments/Reply to Ground "A" is incorrect the transfer order is against the law facts and procedure and is liable to be set aside.
- I. Comments/Reply to ground B is incorrect and misleading the order dated 30.03.2018 is the result of misuse of power and authority and is based on malafide, the appellant has been transfer before the completion of her tenure/period hence the impugned order was/is void ab-intio.
- J. Comments/Reply to Ground C are incorrect and denied, the impugned order is arbitrary, harsh, without lawful authority and jurisdiction.
- K. Comments/Reply to Para D are incorrect & denied. The impugned order is against the rules on the face of it is without rational basis, substance, and basking of any contemporaneous law of the country therefore, the order in question has been issued to accommodate the respondent No.3 as per her sweet will and desire because of political influence.
- L. Comments/Reply to grounds E & F are incorrect and denied the impugned order is nullity in the eyes of law and violation of the judgments of Superior Courts on the subject.
- M. Comments/Reply to Ground G is incorrect and misleading the appellant has been transferred under political influence just to accommodate Respondent No.3 against the post.
- N. In Reply to Para H it is stated that both the orders dated 30.03.2018 and order dated 11.04.2018 are without lawful authority and based on malafide therefore, are liable to be set aside.

In view of the above it is submitted that on acceptance of the Rejoinder/Replication the appeal of the appellant may please be accepted in accordance with law.

Through

Petitioner



(Salim Raza Safi
Advocate High Court
Peshawar
Cell#

Date: 09/07/2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....Appellant

V E R S U S

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....Respondents

AFFIDAVIT

I, Nusrat Jabeen (BS-17) SDEO (F) Takht Bhai, Mardan, do hereby
solemnly affirm and declare on oath that the contents of the **Rejoinder** are
true and correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Court.

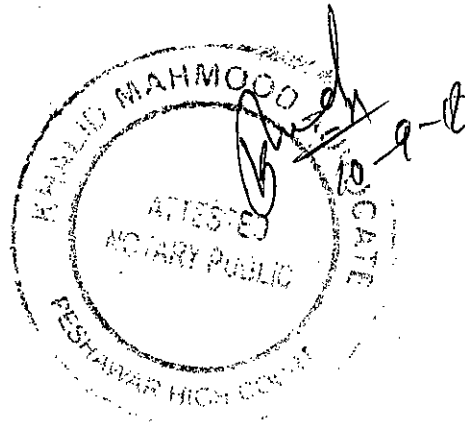
Identified by

Nusrat

DEPONENT

CNIC#

(Salim Raza Safi)
Advocate, Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....**Appellant**

V E R S U S

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....**Respondents**

REJOINER/REPLICATION IN RESPECT
OF PARAWISE COMMENTS SUBMITTED
BY RESPONDENT NO.3.

Respectfully Sheweth:

Reply as to preliminary objections:

1. That Objection No.1 is incorrect the appellant has got a cause of action and locus standi to file the present appeal.
2. That Objection No.2 is incorrect the appeal is maintainable.
3. That Objection No.3 is totally incorrect, the appellant has been transferred under political influence just to accommodate Respondent No.3.

4. That Objection No.4 to 7 are totally incorrect and baseless the appeal of the appellant is according to law and this Hon'ble Tribunal has got the power and jurisdiction to entertain the same.

REPLY ON FACTS:

A. Reply to Para A needs no comments at this stage.

B. Reply to Para B is incorrect the appeal is liable to be allowed.

1. That Reply to Para No.1 to 5 are incorrect however the appellant accepted the transfer order dated 05.10.2018 and took over the charge under serious objections, strong protest, and also to avoid to face the hardships of the litigation but hardly within three months i.e on 30.03.2018 the appellant was again transferred from Takht Bhai to Katlang which is based on malafide and is the result of political influence. It is apparently victimization, mis use of power and authority, discrimination, violation of the constitutional provisions regarding protection, security and safety of fundamental legal and vested rights and the order dated 30.03.2018 has been passed malafidely just to accommodate Respondent No.3 as per his sweet will and desire because of political influence.
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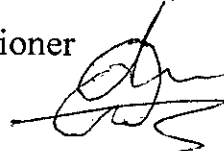
G R O U N D S:

- H. That Comments/Reply to Ground "A" is incorrect the transfer order is against the law facts and procedure and is liable to be set aside.
- I. Comments/Reply to ground B is incorrect and misleading the order dated 30.03.2018 is the result of misuse of power and authority and is based on malafide, the appellant has been transfer before the completion of her tenure/period hence the impugned order was/is void ab-intio.
- J. Comments/Reply to Ground C are incorrect and denied, the impugned order is arbitrary, harsh, without lawful authority and jurisdiction.
- K. Comments/Reply to Para D are incorrect & denied. The impugned order is against the rules on the face of it is without rational basis, substance, and basking of any contemporaneous law of the country therefore, the order in question has been issued to accommodate the respondent No.3 as per her sweet will and desire because of political influence.
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Through

Petitioner



(Salim Raza Safi
Advocate High Court
Peshawar
Cell#

Date: 09/07/2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....**Appellant**

V E R S U S

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....**Respondents**

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Respectfully Sheweth:

Reply as to preliminary objections:

1. That Objection No.1 is incorrect the appellant has got a cause of action and locus standi to file the present appeal.
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4. That Objection No.4 to 7 are totally incorrect and baseless the appeal of the appellant is according to law and this Hon'ble Tribunal has got the power and jurisdiction to entertain the same.

REPLY ON FACTS:

A. Reply to Para A needs no comments at this stage.

B. Reply to Para B is incorrect the appeal is liable to be allowed.

1. That Reply to Para No.1 to 5 are incorrect however the appellant accepted the transfer order dated 05.10.2018 and took over the charge under serious objections, strong protest, and also to avoid to face the hardships of the litigation but hardly within three months i.e on 30.03.2018 the appellant was again transferred from Takht Bhai to Katlang which is based on malafide and is the result of political influence. It is apparently victimization, mis use of power and authority, discrimination, violation of the constitutional provisions regarding protection, security and safety of fundamental legal and vested rights and the order dated 30.03.2018 has been passed malafidely just to accommodate Respondent No.3 as per the sweet will and desire because of political influence.
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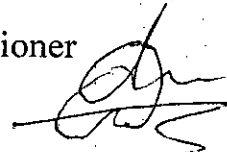
G R O U N D S:

- H. That Comments/Reply to Ground "A" is incorrect the transfer order is against the law facts and procedure and is liable to be set aside.
- I. Comments/Reply to ground B is incorrect and misleading the order dated 30.03.2018 is the result of misuse of power and authority and is based on malafide, the appellant has been transfer before the completion of her tenure/period hence the impugned order was/is void ab-intio.
- J. Comments/Reply to Ground C are incorrect and denied, the impugned order is arbitrary, harsh, without lawful authority and jurisdiction.
- K. Comments/Reply to Para D are incorrect & denied. The impugned order is against the rules on the face of it is without rational basis, substance, and basking of any contemporaneous law of the country therefore, the order in question has been issued to accommodate the respondent No.3 as per her sweet will and desire because of political influence.
- L. Comments/Reply to grounds E & F are incorrect and denied the impugned order is nullity in the eyes of law and violation of the judgments of Superior Courts on the subject.
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In view of the above it is submitted that on acceptance of the Rejoinder/Replication the appeal of the appellant may please be accepted in accordance with law.

Through

Petitioner



(Salim Raza Safi
Advocate High Court
Peshawar
Cell#

Date: 09/07/2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No.575/2018

Nusrat Jabeen.....**Appellant**

V E R S U S

Govt of Khyber Pakhtunhwa through its Secretary Education and
others.....**Respondents**

REJOINDER/REPLICATION IN RESPECT
OF PARAWISE COMMENTS SUBMITTED
BY RESPONDENT NO.3.

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Reply as to preliminary objections:

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2. That Objection No.2 is incorrect the appeal is maintainable.
3. That Objection No.3 is totally incorrect, the appellant has been transferred under political influence just to accommodate Respondent No.3.

4. That Objection No.4 to 7 are totally incorrect and baseless the appeal of the appellant is according to law and this Hon'ble Tribunal has got the power and jurisdiction to entertain the same.

REPLY ON FACTS:

A. Reply to Para A needs no comments at this stage.

B. Reply to Para B is incorrect the appeal is liable to be allowed.

1. That Reply to Para No.1 to 5 are incorrect however the appellant accepted the transfer order dated 05.10.2018 and took over the charge under serious objections, strong protest, and also to avoid to face the hardships of the litigation but hardly within three months i.e on 30.03.2018 the appellant was again transferred from Takht Bhai to Katlang which is based on malafide and is the result of political influence. It is apparently victimization, mis use of power and authority, discrimination, violation of the constitutional provisions regarding protection, security and safety of fundamental legal and vested rights and the order dated 30.03.2018 has been passed malafidely just to accommodate Respondent No.3 as per the sweet will and desire because of political influence.
2. That Para No.6 is incorrect both the orders are based on malafide and are liable to be set aside.

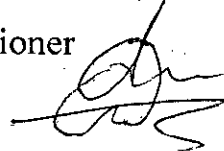
G R O U N D S:

- H. That Comments/Reply to Ground "A" is incorrect the transfer order is against the law facts and procedure and is liable to be set aside.
- I. Comments/Reply to ground B is incorrect and misleading the order dated 30.03.2018 is the result of misuse of power and authority and is based on malafide, the appellant has been transfer before the completion of her tenure/period hence the impugned order was/is void ab-intio.
- J. Comments/Reply to Ground C are incorrect and denied, the impugned order is arbitrary, harsh, without lawful authority and jurisdiction.
- K. Comments/Reply to Para D are incorrect & denied. The impugned order is against the rules on the face of it is without rational basis, substance, and basking of any contemporaneous law of the country therefore, the order in question has been issued to accommodate the respondent No.3 as per her sweet will and desire because of political influence.
- L. Comments/Reply to grounds E & F are incorrect and denied the impugned order is nullity in the eyes of law and violation of the judgments of Superior Courts on the subject.
- M. Comments/Reply to Ground G is incorrect and misleading the appellant has been transferred under political influence just to accommodate Respondent No.3 against the post.
- N. In Reply to Para H it is stated that both the orders dated 30.03.2018 and order dated 11.04.2018 are without lawful authority and based on malafide therefore, are liable to be set aside.

In view of the above it is submitted that on acceptance of the Rejoinder/Replication the appeal of the appellant may please be accepted in accordance with law.

Through

Petitioner



(Salim Raza Safi
Advocate High Court
Peshawar
Cell#

Date: 09/07/2018

BEFORE THE HON'BLE SERVICE TRIBUNAL KPK
PESHAWAR

Nusrat Jabeen Appellant

VERSUS

Govt of KPK & others Respondents

APPLICATION ON BEHALF OF THE
APPELLANT FOR PLACING THE IMPORTANT
DOCUMENTS / NOTIFIATION NO. SO. (S/F)
E&SED/4-16/2018 PLACEMENT COMMITTEE
DATED 9TH FEB 2018 AND NOTIFICATION
NO. SO. (S/F)E&SED/4-16/2018/
PLACEMENT COMMITTEE DATED 28TH FEB
2018 ON THE CASE FILE AND RECORD OF
THE ABOVE TITLED APPEAL.

Respectfully Sheweth:

1. That the above noted case is pending adjudication before this Hon'ble Court, which is fixed for 03.12.2018.
2. That the Respondent No 1 and 2 with the collusion of Respondent No 3 in order to maliciously conceal, dishonestly suppressed and viciously withhold the real facts regarding the transfer of the Respondent No 3 as SDEO(F) BS-17 Topi Swabi vide notification

dated 28.02.2018 and they also not unveiled the contemptuous, illegal, unlawful and incompetent Act and mala practice of the said Respondents as the Respondent No 3 was prior to her transfer vide above referred notification dated 28.02.2018 to Swabi was also transferred vide notification dated 09.02.2018 and her services placed at disposal of the Directorate of (E&SE) for further posting but she because of the political influence and powerfulness of the Respondent No 3 she was succeeded to arrange her transfer from Topi Swabi to Takhtbhai vide notification dated 30.03.2018 i.e within one month without completing her full tenure.

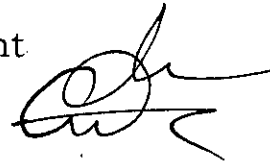
3. That it is also pertinent to bring on record of the above titled case that the Respondent was already will enjoy her services at takhtbhai for long 11 years while the Appellant just completed her two months at Takht Bhai when she vide notification dated 30.03.2018 because of the political victimization deprived her of her legal, vested and constitutional rights.
4. That in order to falsify the wrongful submissions of the Respondents, belies the contemptuous concealment of facts and also to strike down their baseless allegations the above referred additional documents are needed and required to be placed on file hence this Application.

5. That for the ends of justice the necessary and important documents are must be place on file and be read as part and parcel of the original case.
6. That there is no legal bar to place on file the above mentioned document.

It is, therefore, most humbly prayed that on acceptance of this application the above mentioned document may very kindly be placed on file.

Dated: 01.12.2018

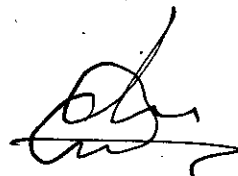
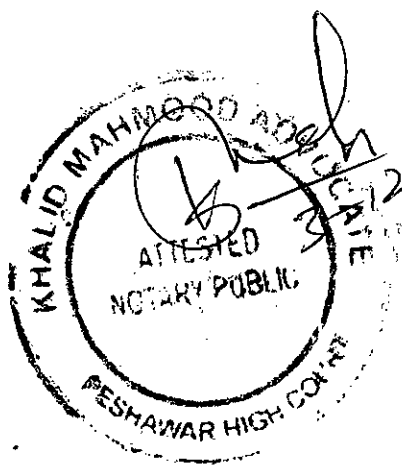
Applicant
Through



Saleem Raza
Advocate, ~~Peshawar~~ Peshawar

AFFIDAVIT

It is stated on oath that the contents of the accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

5140
19

Dated Peshawar the February 9th, 2018

NOTIFICATION

NO. SO(S/F)E&SED/4-16/2018/Placement Committee: Consequent upon the recommendations of Placement Committee, posting/ transfer in respect of following female officers from management/ teaching cadre in the Elementary & Secondary Education Department are hereby ordered against the posts noted against each in the interest of public service with immediate effect:

Sl#	Name & Address	To be posted As	Remarks
1.	Mst. Bibi Aisha (BS-16) SDEO (F) Alpuri Shangla (in her own pay & scale) (Management Cadre)	ASDEO (F) BS-16 Shahpur	A.V.P
2.	Mst. Nusrat Bibi (BS-16) SDEO (F) Puran Shangla (in her own pay & scale) (Teaching Cadre)	SDEO (F) BS-17 Alpuri Shangla	Vice Sr. No. 1 (in her own pay and BPS)
3.	Mst. Shahi Gulfam (BS-16) ASDEO (F) Makhezai Marthoong Shangla	SDEO (F) BS-17 Puran Shangla	Vice Sr. No. 2 (in her own pay and BPS)
4.	Mst. Ghazala Perveen, SST GGMS Butyal Shangla (Teaching Cadre)	SDEO (F) BS-17 Besham Shangla	Vice Sr. No. 5 (in her own pay and BPS)
5.	Mst. Nilofer Sakhawat (BS-16) SDEO (F) Besham Shangla (in her own pay & scale) (Teaching Cadre)	ASDEO (F) BS-16 Butial Circle	A.V.P against newly created post
6.	Mst. Shazia Bibi (BS-17) SDEO (F) Ogi Mansehra (Teaching Cadre)	SDEO (F) BS-17 Baffa Mansehra	A.V.P
7.	Mst. Noreen Ayaz (BS-17) SS (Bio) GGHSS Chapra Haripur (Teaching Cadre)	SDEO (F) BS-17 Ghazi Haripur	A.V.P
8.	Mst. Abida Perveen (BS-17) SDEO (F) waiting for posting (Management Cadre)	SDEO (F) BS-17 Rajjar Swabi	A.V.P
9.	Mr. Fazal e Haq (BS-16) ADEO (E) Kohistan (Teaching Cadre)	SDEO (F) BS-17 Dassu Kohistan	A.V.P in his own pay and BPS
10.	Mst. Rukhsana Rahim (BS-17) SDEO (F) Kalang Mardan (Management Cadre)	Services placed at the disposal of Directorate of E&SE for further posting	

S#	Name & Address	To be posted As	Remarks
11.	Mst. Wahida Khan (BS-17) SDEO (F) Pabbi (Teaching Cadre)	Services placed at the disposal of Directorate of E&SE for further posting	
12.	Mst. Faheem Afshan (BS-16) ASDEO (F) Jehangira Nowshera	SDEO (F) BS-17 Pabbi	Vice Sr. No. 11 (in her own pay & BPS)

2. No TA/DA allowed.

3. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SED/ Directorate of E&SE Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

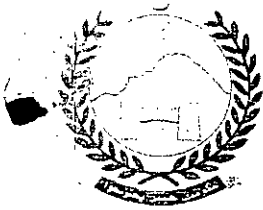
SECRETARY

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) concerned.
4. District Accounts Officers concerned.
5. In-charge EMIS, E&SE Department for uploading at official website.
6. PS to Secretary E&SE Department, Peshawar.
7. PS to Additional Secretary (Estab), E&SE Department, Peshawar.
8. PA to Deputy Secretary (Admn), E&SE Department.
9. Officers concerned.
10. Office order file.

(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the February 28th, 2018

5/10
15

NOTIFICATION

NO. SO(S/F)E&SED/4-16/2018/Placement Committee: Consequent upon the recommendations of Placement Committee meeting held on 27-02-2018, posting/ transfer in respect of following Male/ Female officers from Management/ Teaching Cadre in the Elementary & Secondary Education Department are hereby ordered against the posts noted against each in the interest of public service with immediate effect:

Sr	Name & Designation	Posted As	Remarks
1	Mr. Umer Zaman (BS-18) DDEO (M) Kohistan (Management Cadre)	DDEO (M) BS-18 Torghar	Vice Sr. No. 2
2	Mr. Zulfikar Ul Mulk (BS-18) DDEO (M) For Ghar (Management Cadre)	DDEO (F) BS-18 Nowshera with additional charge of DEO (F) Nowshera	Muhammad Fayaz Khan (BS-19) DEO (M) Nowshera is hereby relieved from the additional charge of DEO (F) Nowshera
3	Muhammad Ishfaq Khan Jadoon (BS-18) Aids Officer at DCTE Abbottabad (Management Cadre)	DDEO (M) BS-18 Haripur	Vice Sr. No. 4
4	Mr. Hafiz Muhammad Nawaz (BS-17) DDEO (M) Haripur	Aids Officer (BS-18) at DCTE Abbottabad	Vice Sr. No. 3
5	Mr. Nisar (BS-17) SDEO (M) Karak (Management Cadre)	SDEO (M) BS-17 Banda Daud Shah Karak	Vice Sr. No. 6
6	Mr. Attiqur Rehman (BS-17) SDEO (M) BD Shah Karak	SDEO (M) BS-17 Takht-e-Nusrati Karak	A.V.P
7	Mr. Muhammad Farooq (BS-16) SDEO (M) O/O DEO (M) Karak (Management Cadre)	SDEO (M) BS-17 Karak (in his own pay & scale)	Vice Sr. No. 5
8	Mr. Fazli Wahid, AD (BS-17) Directorate of E&SE (Management Cadre)	SDEO (M) BS-17 Razzar Swabi	Vice Sr. No. 9
9	Mr. Abdul Ghaffar (BS-17) SDEO (M) Razzar Swabi (Teaching Cadre)	SS (PS) BS-17 GHSS Kalu Khan Swabi	A.V.P
10	Mr. Liaqat Ali (BS-17) SDEO (M) Shabqadar Charsadda (Management Cadre)	AD (BS-17) Directorate of E&SE	Vice Sr. No. 8
11	Muhammad Iqbal (BS-17) AD (Examination) PITE Peshawar (Teaching Cadre)	SDEO (M) BS-17 Shabqadar Charsadda	Vice Sr. No. 10
12	Mst. Hafat Begum (BS-18) DDEO (F) Swabi with additional charge of DEO (M) Swabi (Management Cadre)	DDEO (F) BS-18 Charsadda with additional charge of DEO (F) Charsadda	Vice Sr. No. 13
13	Mst. Nughmana Sardar (BS-18) DDEO (F) Charsadda with additional charge of DEO (F) Charsadda (Management Cadre)	Services placed at the disposal of Directorate of E&SE.	Charge of DEO (Female) Swabi is assigned to DEO(M) Swabi with addition to his own duties.
14	Ms. Rakhsana Rahim (BS-17)	SDEO (F) BS-17 Topi Swabi	A.V.P

7	SDEO (F) Katlang Mardan (Management Cadre)		
16	Mst. Mehr-un-Nisa (BS-17) SDEO (F) Mastooj at Boni District Chitral (Management Cadre)	SDEO (F) BS-17 Drosh Chitral	A.V.P.
17	Mst. Irshad Begum (BS-17) SDEO (F) Barikot Swat (Teaching Cadre)	SDEO (F) BS-17 Matta Swat	A.V.P.
18	Mst. Bibi Aisha (BS-16) ASDEO (F) Shahpur Shangla (Management Cadre)	SDEO (F) BS-17 Alpuri Shangla (in her own pay & scale)	Services of Miss Nusrat Bibi (BS-16) SST are placed at the disposal of Directorate of E&SE
19	Mst. Noreen Saba (BS-16) ADEO (F) Estab: Tank (Management Cadre)	SDEO (F) BS-17 Tank (in her own pay & scale)	Vice Sr No 20
20	Mst. Shahana Yasmin (BS-17) SDEO (F) Tank (Teaching Cadre)	Services placed at the disposal of Directorate of E&SE	

2. No TA/DA allowed.

3. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SED/ Directorate of E&SE Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

SECRETARY

Endst: of even No. & date:

- Copy forwarded to the:
1. Accountant General Khyber Pakhtunkhwa, Peshawar.
 2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
 3. Director PITE, Khyber Pakhtunkhwa, Peshawar.
 4. District Education Officers (Female) concerned.
 5. District Accounts Officers concerned.
 6. In-charge EMIS, E&SE Department **for uploading at official website.**
 7. PS to Secretary E&SE Department, Peshawar.
 8. PS to Additional Secretary (Estab), E&SE Department, Peshawar.
 9. PS to Special Secretary, E&SE Department.
 10. PA to Deputy Secretary (Admn), E&SE Department.
 11. Officers concerned.
 12. Office order file.

(ANEELA FAHIM)
SECTION OFFICER-SCHOOLS
(MALE/ FEMALE)

BEFORE THE HON'BLE PESHAWAR HIGH COURT

PESHAWAR



W.P No. _____/2018

Nusrat Jabeen (Bs-17) SDEO (F) Takht Bhai,

District Mardan R/o House No 8, Lalzar Colony,
University of Peshawar

..... Petitioner

VERSUS

1. Government of Khyber Pakhtunkhwa, through its Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary and Secondary Education, G.T Road, Hashtnagri, Peshawar.
3. Rukhsana Rahim (BS-17) SDEO (F) Topi Swabi.

..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF

THE CONSTITUTION OF ISLAMIC REPUBLIC

OF PAKISTAN, 1973, AS AMENDED UPTO

DATE.

ATTESTED
EXAMINER
Peshawar High Court
11 MAY 2018

Respectfully Sheweth:

2

A. That the addresses of the parties given in the heading of this writ petition will be sufficient for summoning the parties for appearance before this Hon'ble Court.

B. That brief facts given rise to this writ petition are:

FACTS:

1. That the Petitioner is the employee of Education Department in BS-17 presently posted as SDEIO (F) BS-17 Takht Bhai Mardan while the Petitioner is the resident of Peshawar.

2. That by virtue of an order of transfer dated 05.01.2018 the Petitioner was transferred from Government Girls Higher Secondary School Mohib Banda, Nowshera to vacant post of SDEO (F) BS-17 Takht Bhai Mardan. (Copy of transfer order dated 05.01.2018 is attached as annexure A)

3. That the Petitioner took over charge of the post from 08.01.2018. (Copy of the charge report is attached as annexure B)

ATTESTED
EXAMINER
Peshawar High Court
11 MAY 2018

4. That no sooner did the Petitioner remain at Takht Bhai as SDEO (F) for about three months then the Respondent No 1 passed an order dated 30.03.2018 by virtue of which the Petitioner was transferred and posted as SDEO (F) Katlang Mardan, which is too far away a place, which can also be considered hard area. (Copy of the order dated 30.03.2018 is attached as annexure C)

5. That feeling aggrieved of the impugned order of transfer of the Petitioner, the Petitioner preferred under the rules a review petition / representation / appeal before Respondent No 1, but Respondent No 1 passed an order dated 11.04.2018 by virtue of which review petition / representation / appeal of the Petitioner was dismissed. (Copy of the order dated 11.04.2018 of Respondent No 1 is attached as annexure D while ground of review petition / representation / appeal is attached as annexure E)

6. That feeling aggrieved of the impugned order of the Respondent No 1, the Petitioner invoked the

ATTESTED
EXAMINER
District High Court

(4)

appellate jurisdiction of Service Tribunal Khyber Pakhtunkhwa but the Service Tribunal was not functioning due to the retirement of the Chairman and therefore the Petitioner could not find any adequate remedy and therefore she has come to this Hon'ble Court in this writ petition challenging the orders of her transfer on the following grounds amongst others: (Copy of order of Registrar Service Tribunal dated 26.04.2018 is attached as annexure F)

GROUNDS:

A. That the impugned order of the transfer of the Petitioner is without jurisdiction, without lawful authority and of no legal effect.

GROUNDS:

B. That the Petitioner, who is the resident of Peshawar was posted as SS at Government Girls Higher Secondary School, Mohib Banda, District Nowshera, wherefrom she was transferred and posted against the vacant post of SDEO (F) BS-17 Takht Bhai Mardan.

ATTESTED
EXAMINER
Peshawar High Court

5

C. That the Petitioner hardly remained at takht Bhai for three months when Respondent No 1 passed another transfer order by virtue of which the Petitioner was transferred from Takht Bhai to Katlang.

D. That the Petitioner has not yet completed the requisite tenure provided by the rules as such the impugned order is against the rules and is liable to be set aside on this score alone.

E. That the impugned order making transfer of the Petitioner to katlang is also creating problems for the Petitioner, because the Petitioner comes for duties from Peshawar which is too distant a place and is not convenient for the Petitioner.

F. That it is the policy of the Government to post an employee at a nearest station, but contrary to the rules and policy the Petitioner has been transferred to a very faraway place and being female it is not

ATTESTED
EXAMINER
Peshawar High Court
44 MAY 2013

6

possible for the Petitioner to go to katlang from Peshawar.

G. That takht Bhai is convenient for the Petitioner because Takht Bhai is situated on the main road where the Petitioner easily comes for duty.

H. That it will be in the interest of justice if, keeping in view the circumstances of the case, the impugned orders are set aside and the Petitioner is retained at takht Bhai.

It is, therefore, respectfully prayed that this Hon'ble Court may please to accepted this writ petition, the impugned order of transfer of the Petitioner dated 30.03.2018 and the order of the Respondent No 1 dated 11.04.2018 may be declared without jurisdiction, without lawful authority and of no legal effect and it may be directed to the Respondents to retained the Petitioner against post of SDEO (F) BS-17 Takht Bhai with cost throughout.

ATTESTED
EXAMINER
Peshawar High Court
11/04/2018

INTERIM RELIEF:

2

By way of interim relief the impugned order of transfer of the Petitioner may be suspended, till the final decision of the main writ petition, it may also be directed to retained the Petitioner at the place from where she was transferred by the impugned order.

trans

final

Dated: 28.04.2018

where

Through

Petitioner

Qazi Zaki Ud Din
QAZI ZAKI UD DIN
Advocate, Supreme Court
Of Pakistan

CERTIFICATE:

Certified on instructions of my client that petitioner has not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.

Qazi Zaki Ud Din
ADVOCATE

CE

LIST OF BOOKS:

has
Article: Constitution of Islamic Republic of Pakistan,
1973
Date: Any other law books according to need

Qazi Zaki Ud Din
ADVOCATE

ATTESTED

[Signature]

C

BEFORE THE HON'BLE PESHAWAR HIGH COURT
PESHAWAR

W.P No. _____/2018

Nusrat Jabeen Petitioner

VERSUS

Govt of KPK & others Respondents

AFFIDAVIT

I, Nusrat Jabeen (Bs-17) SDEO (F) Takht Bhai, District Mardan R/o House No 8, Lalzar Colony, University of Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Writ Petition are true and correct to the best of my knowledge and belief.

Identified by:

DEPONENT

Ma
Qazi Zaki ud Din
Advocate, Peshawar

CNIC # 17301-9081188-0

ATTESTED
EXAMINER
Peshawar High Court

11 MAY 2018

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge
1	2
10.05.2018	<p><u>W.P.No.2223-P/2018 with Interim Relief</u></p> <p>Present: Mr.Saleem Raza Safi, Advocate for the petitioner.</p> <p>*****</p> <p>Since the Services Tribunal is not functioning, therefore, this petition is entertained.</p> <p>Notice to the respondents. Syed Qaiser Ali Shah, AA. present in Court in different matter, accepts notice of this petition.</p> <p>Adjourned to a date in office. In the meantime, the operation of the impugned order is suspended.</p>



No. 2223
Date of Presentation of Application: 10/5/18
No of Pages: 2
Copying Fee: 20/-
Urgent Fee: 20/-
Total: 40/-
Date of Preparation of Copy: 10/5/18
Date of Delivery of Copy: 10/5/18
Received By: [Signature]

[Signature]
CHIEF JUSTICE

[Signature]
JUDGE

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized under Article 8.7 of
The Courts (Amendment) Order 1984
11 MAY 2018

F. Jani
(BB) Hon'ble Mr. Justice Yahya Afridi, Chief Justice
Hon'ble Mr. Justice Waqar Ahmad Seth, Judge.

2/10/14

Amme



GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT

Dated Peshawar the 1st October, 2014.

NOTIFICATION:

NO.S.O(LFC)AD-DF-E-3(19) 2014: Under Rule-20 of the Government of Khyber Pakhtunkhwa, Revised Leave Rules 1981, sanction is hereby accorded to the grant of 365 days leave encashment in lieu of LPR with effect from **18.03.2015**, in respect of **Mr. Sharif Ullah Khan**, Director of Fisheries, Khyber Pakhtunkhwa Peshawar.

2. The Officer shall stand retire from his service on completion of qualifying service on **18.03.2015 (A.N)**.

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA,
AGRICULTURE, LIVESTOCK & COOPERATIVE
DEPARTMENT.

ENDST: NO. & DATE EVEN:

Copy to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Officer concerned.
3. P.S to Secretary, Agriculture, Livestock & Cooperative Department.
4. Master File.

Estt.

2/10

Assistant Secretary
Head Quarter
D/O Director of Fisheries
Khyber Pakhtoon Khwa
Province, Peshawar

r. Mir Ahmad Khan
ATION OFFICER (LFC)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE DEPARTMENT

Dated Peshawar the 8/9/2016.

NOTIFICATION.

No. 50(LFC)AD-DF-3(16)PF/2016.- In terms of provisions of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981 and instructions contained there under issued from time to time, sanction is hereby accorded to the grant of 365 days leave encashment in lieu of LPR in respect of Mr. Inam-ur-Rahim, Deputy Director Fisheries (BS-18), Carp Hatchery and Training Centre, Peshawar.


2. In terms of Section-13 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 the officer will retire from service with effect from 31-08-2016(A.N) on attaining the age of Superannuation.

507
SECRETARY AGRICULTURE

ENDST: NO. & DATE EVEN:

Copy forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director Fisheries, Khyber Pakhtunkhwa Peshawar w/r to his letter No. 1575 dated 9/8/2016.
3. Officer concerned.
4. PS to Secretary Agriculture, Livestock & Cooperative Department.
5. Master File.


Assistant Director Fisheries
CH&TC Peshawar


(DR. MIR AHMAD KHAN)
SECTION OFFICER (ESTAB)

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT,
MINGORA BENCH (DAR-UL-QAZA), SWAT
(Judicial Department)

W.P. No. 488-M of 2013.

JUDGMENT

Date of hearing: 12.02.2014.

Petitioner *(Mst. Dilshad Begum) by Mr. Aziz-ur-Rahman,*
Advocate.

Respondents: *by Muhammad Javed, AAG.*

MUHAMMAD DAUD KHAN, J.- Petitioner Dilshad Begum, who is the District Education Officer (Female) in BPS-18, Management Cadre is aggrieved by the order of Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar (Respondent No. 2) through notification No. SO(S/F)E&SE/4-16/2013/Perveen and Dilshad Begum dated 24.10.2013, vide which the petitioner has been transferred from Executive/Management Cadre to Teaching Cadre, thus seeks issuance of appropriate writ by declaring the above mentioned order to be illegal, without lawful authority and jurisdiction, malafide, hence liable to outright cancellation.

2. The brief facts of the case are that initially the petitioner was appointed as

District Officer/Deputy Director (Female) BPS-18 in the Management Cadre on the recommendation of the Khyber Pakhtunkhwa, Public Service Commission vide notification No. SO/(S/F)E&SED/3-2/2011/DO(F) dated 30.05.2011. At present she was performing her duties as District Education Officer (Female) to the entire satisfaction of their superior ups. The Respondent No. 2, the Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar vide the impugned Notification No. SO(S/F)E&SE/4-16/2013/Parveen & Dilshad Begum dated 24.10.2013 transferred the petitioner and she was placed at the disposal of the Directorate Elementary & Secondary Education, Peshawar. Feeling aggrieved by the impugned notification, the petitioner has preferred the instant writ petition.

3. Mr. Aziz-ur-Rehman Advocate, learned counsel for petitioner argued that the petitioner has been subjected to sever kind of discrimination as she was performing her duties to the entire satisfaction of their superior ups but when she did not obey the unlawful and unconstitutional orders of the political elite, she was not only transferred vide the impugned notification but it is also irony of the matter that she

was posted at the disposal of Directorate of Elementary & Secondary Education, Peshawar in other words she was made O.S.D. He further argued that Superior Court of this country has laid-down principles that in case of stigma allegation or if a person became O.S.D, he or she must be given a fair opportunity of hearing to defend herself and mere provision of Article 212 regarding terms and conditions of civil servant cannot become a stumbling block, when the fundamental rights of an individual is infringed by the political elites for fulfillment of their unlawful acts, then the Court can assume jurisdiction and protect the fundamental rights of every individual in the society, but in the case in hand this Golden principle has been violated. He further submitted that the petitioner was duly appointed on the recommendation of Khyber Pakhtunkhwa, Public Service Commission in Management Cadre after fulfilling all the codal formalities as required under the law, while the transferee, who has been posted at her place is belonged to Teaching cadre, so, the precedents and judgments of this Hon'ble Court regarding bifurcation of Management and Teaching Cadres have also been totally ignored by the respondents. He lastly submitted that the impugned

notification may be set aside and the petitioner be allowed to perform her duties as before. Learned counsel for petitioner placed reliance on PLD 1995, Supreme Court 530, 2005 SCMR 589, 1976 SCMR 1786 & 2013 SCMR 1108.

4. Learned AAG appearing on behalf of the respondents vehemently defended the impugned order of respondent No. 2 by submitting that admittedly, the petitioner is a civil servant and the matter of transfer relates to her terms and conditions of service, for which the competent forum is the Khyber Pakhtunkhwa, Service Tribunal constituted under Service Tribunals Act, 1973, as the jurisdiction of all other Courts including the High Court was specifically ousted because of the provisions contained in Article 212 of the Constitution. He further argued that through subsequent amendment vide Notification dated 07.04.2012, in Sub Rule (2) of Khyber Pakhtunkhwa, Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the Management Cadre as well as Teaching cadre are inter-transferrable, so, besides, the above, on this score alone, the instant petition is not maintainable in the eye of law and is liable to be dismissed. Learned AAG

placed reliance on 2007 SCMR 54 & PLD 2008, Peshawar, Page No. 868.

5. Lengthy arguments of learned counsel for the parties were heard and record of the case was thoroughly perused with their valuable assistance.

6. Vide notification dated 04.05.2009, separate Rules for Management Cadre have been formulated, wherein the following method of recruitments, qualification and other condition were laid down:-

QUALIFICATION: (1) Ph.D in Education and Seven years teaching/administrative experience in Govt: recognized educational institutions/Office; or (ii) M.Phil in Education and Nine years teaching/administrative experience in Govt: recognized educational institutions/office; or (iii) M.A/M.Sc in 2nd Div with M.Ed/M.A. (Education)/M.A. (Education Planning & Management) or equivalent qualification with at least twelve years teaching/administrative experience in Govt: recognized educational institutions/office.
Age Limit for appointment against the said post was prescribed as 35 to 50 years.

Under the Rules applicable to the posts of Schools Management Cadre in the Elementary and Secondary Education Department, the method for recruitment was provided as under:-

By initial recruitments in the following manner:

- (a) Forty percent by initial recruitment from amongst open market;
and
- (b) Sixty percent by initial recruitment from amongst the Teaching

Cadre having the qualification as mentioned in column No. 3.

7. The purpose beyond formation of Management Cadre was to streamline the affairs in the offices of the then Executive District Officers now District Officers, and Directorate of the Elementary & Secondary School. Before bifurcation of two cadres, persons from teaching were used to be appointed as EDOs, who were regularly transferred from their posts back to the schools due to political influence. After the introduction of Management cadre, the government banned transfer of EDOs back to the school, as to remove the fear of transfer amongst them.

8. After the above narrated process, the Provincial Government sent the requisition to the Public Service Commission for appointment of twenty one (21) posts of District Officers/Deputy Directors (Female) (BPS-18), from the persons possessing the qualification mentioned above. After competitive test and interview, the successful, qualified persons were recommended by the Khyber Pakhtunkhwa, Public Service Commission. Consequently, the Provincial Government issued Notification No. SO/(S/F)E&SED/3-2/2011/DO(F) dated 30.05.2011, regarding appointment of the successful candidates

including the petitioner under the Policy & Rules of 2009.

9. As stated above, that the petitioner was duly appointed on the recommendation of Khyber Pakhtunkhwa, Public Service Commission in Management Cadre, whereas, the transferee, who has been posted at her place was admittedly belonged to Teaching Cadre, so, the precedents and judgments regarding bifurcation of Management and Teaching Cadres have been totally violated by the respondents. As far as, the argument of learned A.A.G that the petitioner is admittedly a civil servant and the matter of transfer relates to terms and conditions of her service, so, the jurisdiction of all other Courts including the High Court was specifically ousted because of the provisions contained in Article 212 of the Constitution, is concerned, we are fully agreed with the learned A.A.G to the extent that the petitioner is a civil servant and the matter of transfer relates to her terms and conditions of service but this Court has to see the facts and circumstances of each and every case and cannot become a mere spectator or bench-sitter and refuse the relief claimed against an illegal and void order on the question of want of jurisdiction, as the case in hand, the petitioner was

politically victimized by the ruling elite of the province, which is quite apparent from the photocopy of letter produced by the learned counsel for petitioner wherein transfer of petitioner was strongly recommended by Mehmood Khan, Minister for Spots, Culture, Tourism and Museum Departments K.P.K and Muhibullah Khan the local MPA to the higher authority because the petitioner was not ready to obey their unlawful and unconstitutional orders. The transfer of civil servants by the illegal recommendation and interference was declared void and unlawful by the superior Courts repeatedly. The Supreme Court vide its judgment in Civil Petition No. 747-P/2004 titled Roshan Khan Vs. Director Sports, on reliance on **PLD 1995 SC 530** has held as under.

"Transfer of civil servant under the orders of even a Minister was held by this Court to be void and unlawful, being violative of Rule 21(2) read with Schedule V of Rules of Business 1974. While condemning the role of Minister, that of tamed and subservient bureaucracy was also condemned and need for an upright, honest and strong bureaucracy was emphasized."

This illegal action has also been condemned by the august Supreme Court of Pakistan in its judgment Syed Sikandar Ali Shah Vs. Auditor General of Pakistan and others (2002 SCMR 1124)

in which capricious and arbitrary directions of political bosses without raising the slightest protest by Competent Authority have been prohibited as the same depicts a cowardly and condemnable trend.

We fortify our view with the judgment of the apex Court reported in 1995 PLD 530 (supra). The transfer of civil servant under the orders or directions of a Minister of other department is certainly void, unlawful and violative of rules. The relevant dictum of the judgment 1995 PLD SC 530 is reproduced as under.

"The fact that the transfers were made in violation of policy directive of the Government, which has the status of a Rule, and provisions of Rule 21(2) ibid were not followed strictly, opened the door for the Government servant concerned to bring in outside influence to obtain the desired transfers."

The other defence taken by the learned A.A.G. is that the policy and Rules of 2009 have been changed by the Provincial Government in the year 2012 vide amended notification dated 07.4.2012, by virtue of that the management and teaching cadres are transferable inter se. He referred to the relevant portion of the amended Rules of 2012, which read as under:-

"We have noted with great concern that this amendment was necessitated and introduced, when this Court decided W.P 3519, titled "Abdul

"We have noted with great concern that this amendment was necessitated and introduced, when this Court decided W.P 3519, titled "Abdul Malik VS Govt of K.P.K", whereby the transfer order of abovementioned Abdul Malik from management Cadre to the Teaching Cadre was set aside. It is an admitted fact that the petitioners have been appointed against their respective posts through Public Service Commission and mere endorsement of a foot-note would not change the terms and conditions of the service of petitioners. The afore-said note would never occupy the place of a statute and would not prevail upon or render redundant the parent statute. According to the well established principle of Interpretation of Statute and in particular, any proviso attached to the main section would not render redundant or ineffective the substantial provision of the main section. Reliance may be placed on case titled, "Enmay Zed Publications (Pvt) Vs Sindh Labour Appellate Tribunal" (2001 SCMR 565)."

In the instant case, the petitioner has been appointed through Public Service Commission after qualifying the competitive test and interview. The selection is purely on merit basis which has never

been denied by the respondents. It is not also controverted by the respondents that they have been appointed under the Rules 2009. In these eventualities the amended Rules would not operate retrospectively. Reliance in this regard can be placed on 2012 SCMR 965 titled WAPDA Lahore Vs. Haji Abdul Aziz. The relevant portion is reproduced as under.

“Rules operated prospectively and if a right was created in favour of an employee under the old rule, it could not be taken away on the ground that the amended rule had allowed others to compete.”

Moreover, the amended rules have also been nullified by the judgment of this Court in W.P No. 3663-P/2012 decided on 08.5.2013. Operative part of the judgment is reproduced as under.

“In wake of the above, the amendment notification dated 07.4.2012, being in contravention of the main policy/statute, is declared as illegal, arbitrary and against law, hence set aside. Likewise, the impugned orders of the respondents qua transfer of the petitioners from the Executive Cadre to the Teaching Cadre, being not permissible and the same being whimsical, arbitrary and punitive in nature and

therefore, in violation of fundamental rights enshrined in Constitution of 1973 and in contravention of Rules and policy, hence, are not sustainable”

12. Thus, keeping the above discussion, the instant petition is allowed and impugned notification dated 24.10.2013, being in contravention of the main policy, is declared as illegal, mala fide and arbitrary, hence set aside.

The query of learned AAG that the policy and rule of 2009 has been reviewed by the Provincial Government in the year 2012, by virtue of that, the Management and Teaching Cadres are inter-transferrable is without force, as this aspect of the case was thoroughly explained by this Court in Writ Petition No. 3663-P of 2012 Titled “ **Sultan Mahmood VS Government of Khyber Pakhtunkhwa & others**”, which is self-explanatory and needs no reiteration.

In wake of the above discussion, the instant petition is allowed and the impugned Notification dated 24.10.2013 of respondent No. 2 is hereby set aside.

Announced.
Dt: 12.02.2014.

J U D G E

IN THE COURT OF CIVIL JUDGE-XI, MARDAN

Mst.Nusrat Jabeen vs Principal etc

Suit No.156/01 of 2018

Order---06

Dt; 24.04.2018

Plaintiff in person along with counsel present.
Defendants through representative present.

This order intends to dispose of an application filed by the petitioners/defendants for rejection of plaint u/Order-07 Rule-11 CPC.

Reply submitted. Arguments heard and available record perused.

Learned counsel for the petitioners/defendants contended that the matter pertains to the terms & conditions of a Civil Servant, so this court cannot entertain the matter for want of jurisdiction. Further argued that Service Tribunal has exclusive jurisdiction to entertain such like matters, therefore, on acceptance of application plaint of the plaintiff be dismissed.



Conversely, learned counsel for the respondent argued that transfer order made by defendants is arbitrary, politically motivated, illegal without jurisdiction and void ab initio. Further submitted that the matter is purely of civil nature and has no concern with the terms and conditions of civil servant, therefore, this Court has got the

jurisdiction to entertain the lis. Lastly, prayed for dismissal of application.

As such, plaintiff has challenged the transfer order vide notification No.SO(SM) E&SED/2-1/2018/Posting/transfer of DEO, DDEO, SDEOs; dated 30 March 2018 through the instant suit for declaration and perpetual prohibitory injunction. So, it is held that the matter pertains to the terms and conditions of service which can only be entertained by the services tribunal. Moreover, due to bar contained in Article 212 of the Constitution of Pakistan 1973, this Court cannot interfere in the matter. Reliance is made on 2007 SCMR 54.

In sequel to above all discussion, it is held that the plaintiff has approached the wrong forum, hence application is allowed and plaint is hereby rejected under Order 07 Rule 11 of CPC.

No order as to cost.

File be consigned to record room after its necessary completion & compilation.

ANNOUNCED:
Dt; 24.04.2018


NAJEEBUL HAQ,
CIVIL JUDGE (M) & JUDGE XI, MARDAN.



IN THE COURT OF SENIOR CIVIL JUDGE, MARDAN

1. Mst Nusrat Jabeen Wife Sultan Salahudin, SDEO Female Tehsil Takhtbhai District Mardan.

PLAINTIFF...

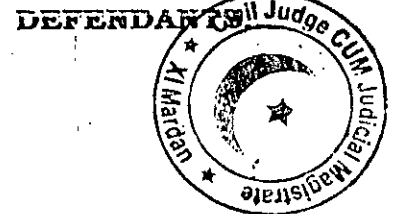
VERSUS

1. Principal Secretary to Chief Minister Khyber Pakhtunkhwa Peshawar.
2. Government of KPK through Secretary For Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Commissioner Mardan.
5. District Account Officer Mardan.
6. District Education Officer (Female) Mardan.
7. District Nazim Mardan.

C. No. _____
Date: _____

03/4/18

Sd/- _____
District Mardan



SUIT FOR DECLARATION ETC.

A SUIT FOR GRANT OF DECREE FOR:

A. **DECLARATION** to the effect that the plaintiff is a Government servant, and working as SDEO(Female) Takhtbhai in BPS-17, and the transfer order made by Defendant No.2 vide Notification No.SO(SM) **EASED/2-1/2018/POSTING/TRANSFER of DEO, DDEO, SDEOs:** Dated 30 March 2018, whereby the Plaintiff mentioned in Sr.No. 14 is transferred from Tehsil Takhtbhai to Teshil Katlang, District Mardan, is arbitrary, unconstitutional, Politically motivated, illegal, against the Posting/Transfer Policy, therefore unwarranted and liable to be reversed & set aside.

B. **PERPETUAL PROHIBITARY INJUNCTION** restraining the Defendants from taking charge from the plaintiff, and obstructing her from performing her duties as SDEO(FEMALE) Takhtbhai:

Value for the purpose of Court fee &	Jurisdiction	Cause of Action
Relief A =	Rs.300/-	Rs.10000/- A week ago by refusal
Relief B =	Rs.200/-	Rs.10000/- of defendants to accept
Court Fee Affixed=	500/-	the claim of plaintiffs

in the Jurisdiction of this Hon'ble Court.

Most Respectfully Submitted;

1. That the plaintiff is a Government officer working as SDEO(FEMALE) in tehsil Takhtbhai, since 5th January, when she was transferred from Azakhel Nowshehra vide Notification **NO.SO(S/F)E&SED/4-16/2018/Placement Committee: (Copy of Notification is Annexed as "A")**
2. That soon after assuming charge as SDEO(FEMALE) in tehsil Takhtbhai the plaintiff was again transferred to Tehsil Katlang vide Notification **No.SO(SM)E&SED/2-1/2018/POSTING/TRANSFER of DEO, DDEO, SDEOs: Dated 30 March 2018. (Copy of Notification is Annexed as "B")**
3. That the Transfer order made by defendant No.2 is arbitrary, unconstitutional, Politically motivated, illegal, against the Posting/Transfer Policy, therefore unwarranted and liable to be reversed & set aside, on the following amongst other grounds inter alia:

GROUND

1. That the impugned act of the Defendant No.2 in transferring was not sustainable in the eye of law. The said act of the respondent in particular, was mala-fide, patently illegal, discriminatory in nature, motivated in substance and effected for his personal and parochial gains. The respondents No.2 blatantly violated the formulated policy of postings and transfers of DAOs, and impugn orders are result of violation of the same.
2. That the postings and transfers of the petitioners have been made prematurely, hence not sustainable on the strength of the above-said policy in this behalf. The policy clearly stipulates that an officer cannot be transferred from one place to another before lapse of three years, hence impugned action is devoid of lawful authority. The

public functionaries are duty bound to act in accordance with law in view of Article 4 of the Constitution as held by the august Supreme Court of Pakistan in a case reported in **PLD 1995 SC 530**. It is duty of every organ and functionary of the State to provide justice by discharging its duty in accordance with law. However, the Defendant No.2 mutilated such rights of the plaintiff.

3. It was further stated that the petitioners are suffering for no fault of their own and, therefore, left at the mercy of capriciousness, whims, prejudices and discriminatory will of the Defendant No.2. The instant situation, therefore, definitely warrants kind indulgence and interference by the Hon'able Court in exercise of its Ultimate jurisdiction, as envisaged in Section 9 of Civil Procedure Code.
4. It is fundamental right of the plaintiff that they be treated in accordance with law and Constitution, which has been trampled upon by the Defendants, The conduct of the Defendant No.2 viz. the service rights of the plaintiff is incomprehensible, illegal and frustrating, hence intervention of the hon'able Court is utmost warranted.
5. Based on the above, the petitioners had no any other efficacious and speedy remedy except to knock at the door of the hon'able Court for redemption of their rights of being treated in accordance with law.
6. That the defendants were asked time and again to refrain from their lawful acts but they never paid any heed to it, and finally blatantly refused and kept on their illegal practices, hence this suit.
7. That the value for the purpose of court fee and Jurisdiction is correctly mentioned in heading of the plaint.
8. That the cause of action firstly accrued to the plaintiffs a week ago of when the defendants refused to accede to the plaintiffs' claim by not reversing the Transfer order, and the same is continuing.
9. That the parties reside in local limits of Mardan, and cause of action has also arisen here. Therefore this Hon'ble court has got Jurisdiction to adjudicate this "*Lis*".

PRAYER

**It Is Therefore Most Respectfully Prayed
That This Hon'ble Court May Very Graciously Be
Pleased To Pass the Decrees, as prayed for in
title of plaint, in favor of Plaintiff and against
Defendants with costs.**

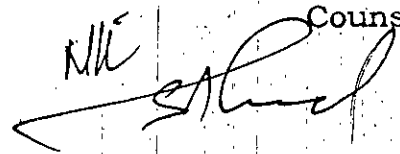
**And Any Other Relief Which This Court
Deems Fit And Apt For The Ends Of Justice May
Also Be Granted.**

Dated 06 April 6, 2018.

Plaintiff

Saeed Ahmad Khan
Advocate High Court
Cell: 0314-9001117

Through
Counsel

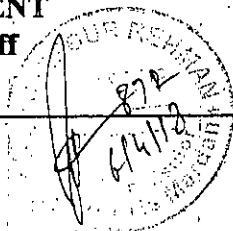


**Saeed Ahmad Khan,
Advocate High Court,
At District Courts Mardan.
Cell: 0314-9001117**

AFFIDAVIT

Verified on oath that all the contents of this plaint are true and correct as per my knowledge and belief and nothing has been concealed therein. No other such like suit is instituted or pending before any court.

**DEPONENT
Plaintiff**



IN THE COURT OF SENIOR CIVIL JUDGE, MARDAN

Mst. Nusrat Jabeen Vs Principal Secretary KpK

SUIT FOR DECLARATION ETC.

**APPLICATION FOR TEMPORARY INJUNCTION UNDER ORDER 39
RULE 1&2 READ WITH SECTION 151 CPC RESTRAINING THE
DEFENDANTS FROM TAKING THE CHARGE FROM THE PLAINTIFF
AND OBSTRUCTING HER RIGHT TO PERFORM DUTIES IN ANY
MANNER, PENDING DISPOSAL OF THIS SUIT.**

Respectfully Sheweth,

1. That the petitioners have filed the above captioned suit in this Honourable court today, the contents of which may be read as integral part of this petition.
2. That the petitioners have a strong prima facie case and there is every likelihood of his success in the same.
3. That the balance of convenience is also in favor of the petitioners.
4. That if the stay order is not granted in favor of the petitioners, then the petitioners would suffer irreparable loss.

PRAYER

It Is Therefore, Most Respectfully Prayed That This Hon'ble Court May Very Graciously Pleased To Grant The Temporary Injunction In Favor Of The Plaintiff Against The Defendants, Restraining The Defendants From Taking charge from the plaintiff and obstructing her rights to perform her duties, till the pendency of this suit.

And Any Other Relief Which This Court Deems Fit And Apt For The Ends Of Justice May Also Be Granted.

Dated 6 April 2018

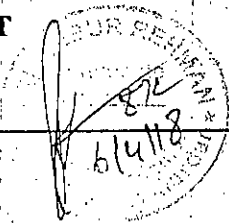
Plaintiff/Petitioner

M/K
Through
Counsel

AFFIDAVIT

Verified on oath that all the contents of this application are true and correct as per my knowledge and belief and nothing has been concealed therein.

M/K
DEPONENT
Plaintiff



Saeed Ahmad Khan
Advocate High Court
Cell: 0314-9001117

Saeed Ahmad Khan

Saeed Ahmad Khan,
Advocate High Court,
At District Courts Mardan.
Cell: 0314-9001117

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

C.M.No. _____/2018

Diary No. 1039

IN

Dated 24/9/2018

Service Appeal No.575/2018

*Put up to the court
with relevant appeal:*

Nusrat Jabeen
24/9/18
Nusrat Jabeen.....**Appellant**

VERSUS

Govt of Khyber Pakhtunhwa through its Secretary
Education and others.....**Respondents**

**APPLICATION FOR RESTORATION OF THE
APPLICATION FOR INTERIM RELIEF IN SERVICE
APPEAL.NO.757/2018 WHICH WAS DISMISSED
IN DEFAULT BY THIS HON'BLE FORUM VIDE
ORDER DATED 24.07.2018**

Respectfully Sheweth:

1. That the tilted appeal was pending before this Hon'ble Court which was dismissed in default by this Hon'ble Forum today i.e 24.09.2018.
2. That the daughter of the applicant has been Hospitalized and the applicant/appellant is with her in Islamabad.
3. That the counsel for the appellant appeared two/three times since morning but as this Hon'ble Forum/Divisional Bench was not in sitting and the

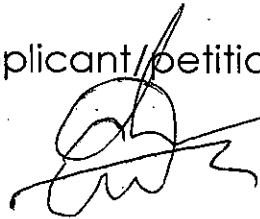
single bench was working therefore; counsel for the appellant went in other Courts to attend other cases.

4. That since valuable rights of the applicant are involved therefore justice, equity and proprietary demands that the application be restored and be decided on its own merits.
5. That as the application is within time and there is no legal bar on restoration of the appeal.
6. That if the appeal would not be restored along with interim application then the applicant/appellant will suffer irreparable loss and injuries.

It is, therefore prayed that by accepting this application, the titled Appeal may please be restored to its original number and be decided on its own merits in according with law.

Through

Applicant/petitioner



Salim Raza Safi

Advocate, High Court
Peshawar

Dated 24.09.2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

C.M.No. ____/2018

IN

Service Appeal No.575/2018

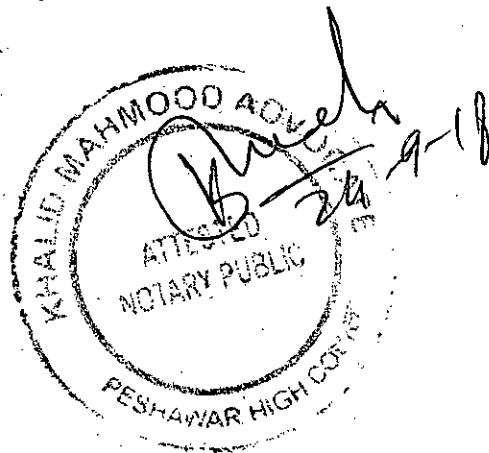
Nusrat Jabeen.....**Appellant**

VERSUS

Govt of Khyber Pakhtunhwa through its Secretary
Education and others.....**Respondents**

AFFIDAVIT

I, Salim Raza Safi Advocate, as per instruction of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Restoration Application No. 295/2018

C.M.No. _____/2018

IN

Service Appeal No. 575/2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1040

Dated 24/9/2018

Nusrat Jabeen.....Appellant

VERSUS

Govt of Khyber Pakhtunhwa through its Secretary
Education and others.....Respondents

**APPLICATION FOR RESTORATION OF THE TITLED
SERVICE APPEAL.NO.757/2018 APPLICATION
WHICH WAS DISMISSED IN DEFAULT BY THIS
HON'BLE FORUM VIDE ORDER DATED
24.07.2018**

Respectfully Sheweth:

1. That the tilted appeal was pending before this Hon'ble Court which was dismissed in default by this Hon'ble Forum today i.e 24.09.2018.
2. That the daughter of the applicant has been Hospitalized and the applicant/appellant is with her in Islamabad.
3. That the counsel for the appellant appeared two/three times since morning but as this Hon'ble Forum/Divisional Bench was not in sitting and the

single bench was working therefore, counsel for the appellant went in other Courts to attend other cases.

4. That since valuable rights of the applicant are involved therefore justice, equity and proprietary demands that the application be restored and be decided on its own merits.
5. That as the application is within time and there is no legal bar on restoration of the appeal.
6. That if the appeal would not be restored along with interim application then the applicant/appellant will suffer irreparable loss and injuries.

It is, therefore prayed that by accepting this application, the titled Appeal may please be restored to its original number and be decided on its own merit.

Through Applicant/petitioner



Salim Raza Safi
Advocate, High Court
Peshawar

Dated 24.09.2018

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

C.M.No. _____/2018

IN

Service Appeal No.575/2018

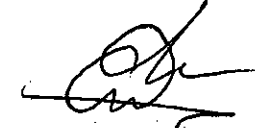
Nusrat Jabeen.....**Appellant**

VERSUS

Govt of Khyber Pakhtunhwa through its Secretary
Education and others.....**Respondents**

AFFIDAVIT

I, Salim Raza Safi Advocate, as per instruction of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

