

BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR

A No =
Mst. Saira Bano.....11/18.....Appellant

Versus

District Education Officer (Female)
Kohistan etc.....Respondents

SERVICE APPEAL

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Dated 16/07/2022

Saira Bano

Mst. Saira Bano

(Appellant)

Through: -

Shad Muhammad Khan
SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

①

BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR

Mst. Saira Bano daughter of Sarfraz
resident of Village Reerh, Tehsil and District
Mansehra, EX-PTC Teacher, Govt. Girls
Primary School Chochang, Tehsil Dassu
District Kohistan.....**Appellant**

Versus

- 1) District Education Officer (Female)
Kohistan
- 2) Director Education KPK
Peshawar.....**Respondents**

APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT AGAINST
THE ORDER OF RESPONDENT NO. 1
DATED 09.09.2021 VIDE WHICH THE
APPELLANT HAS BEEN REMOVED
FROM SERVICE BY INVOKING RULE 4
(B) OF E&D RULES 2011

PRAYER: -

On acceptance of appeal the
impugned order may graciously be
set aside and the appellant may
kindly be re-instated in service.

Respected Sir,

The brief facts leading to the instant
appeal are arrayed as follows: -

- 1) That, the appellant was appointed
against the post of PTC on
31.10.1997 and since then the
appellant is serving the department
devotedly. The appellant was

posted/transferred at schools during the above period.

(The copy of appointments are attached as Annexure

- 2) That, respondent No. 1 per order vide endst. No. 46070 (F)/KH, dated 09.09.2018 which the appellant was removed from service by invoking reasons mentioned above.

(The copy of order is attached as Annexure "C").

- 3) That, the appellant submitted appeal before respondent No. 21.09.2021 for setting aside the order of removal but no information nor any information with respect to the fate of appeal was communicated to the appellant.

(The copy of appeal is attached as Annexure "D").

- 4) That, the appellant submitted a reminder for the decision on her appeal but despite reminder neither the appeal was decided nor the fate of appeal was communicated to her.

(The copy of reminder is attached as Annexure "E").

- 5) That, finding no other alternative, the appellant sent a legal notice through her counsel with the request to decide the fate of appeal

in one way or other and to communicate the order if any so that she could approach the competent court of law for the redressal of her grievances.

(The copy of legal notice is attached as Annexure "F").

That, the appellant seeks her reinstatement on the following amongst other grounds: -

GROUND: -

- A) That, the order passed by respondent No. 1 is against the facts patent on record and is also opposed to law applicable thereto, therefore the order is not maintainable in the eye of law.
- B) That, the appellant was never served with any show cause notice nor with any other proceedings with respect to the proposed action.
- C) That, the appellant was never communicated with a charge sheet nor with a statement of allegations and thus the order so passed lacks the backing of law.
- D) That, no any inquiry has been conducted by the department in order to establish the allegations therefore, on this account the entire

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proceedings are nullity in the eye of law.

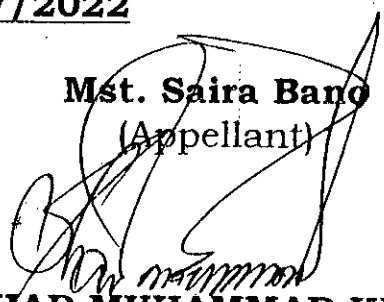
E) That, the appellant has been deprived of rights stipulated by law and the entire proceedings were conducted at her back, therefore the order carried no value in the eye of law.

It is, therefore most humbly prayed that on acceptance of appeal the impugned order of removal may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits.

Dated 16/07/2022

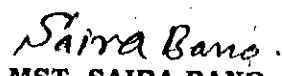
Mst. Saira Bano
(Appellant)

Through:


SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

VERIFICATION

I, MST. SAIRA BANO DAUGHTER OF SARFRAZ RESIDENT OF VILLAGE REERH, TEHSIL AND DISTRICT MANSEHRA, EX-PTC TEACHER, GOVT. GIRLS PRIMARY SCHOOL CHOCHANG, TEHSIL DASSU DISTRICT KOHISTAN DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.


MST. SAIRA BANO
(DEPONENT)

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BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR

Mst. Saira Bano.....Appellant

Versus

District Education Officer (Female)
Kohistan etc:.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

Respected Sir,

Correct addresses of the parties are
as under: -

APPELLANT

Mst. Saira Bano daughter of Sarfraz
resident of Village Reerh, Tehsil and District
Mansehra, EX-PTC Teacher, Govt. Girls
Primary School Chochang, Tehsil Dassu
District Kohistan

RESPONDENTS

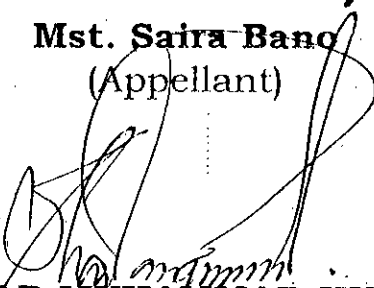
- 1) District Education Officer (Female)
Kohistan
- 2) Director Education KPK Peshawar

Dated 16 /07/2022

Saira Bano

Mst. Saira Bano
(Appellant)

Through: -



SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

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BEFORE THE SERVICE TRIBUNAL,
KPK PESHAWAR

Mst. Saira Bano.....Appellant

Versus

District Education Officer (Female)
Kohistan etc.....Respondents

SERVICE APPEAL

AFFIDAVIT

I, MST. SAIRA BANO DAUGHTER OF SARFRAZ
RESIDENT OF VILLAGE REERH, TEHSIL AND
DISTRICT MANSEHRA, EX-PTC TEACHER, GOVT.
GIRLS PRIMARY SCHOOL CHOCHANG, TEHSIL DASSU
DISTRICT KOHISTAN DO HEREBY VERIFY THAT THE
CONTENTS OF FORE-GOING APPEAL ARE TRUE AND
CORRECT TO THE BEST OF MY KNOWLEDGE AND
BELIEF AND NOTHING HAS BEEN CONCEALED OR
SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Saira Bano

MST. SAIRA BANO
(DEPONENT)

IDENTIFIED BY: -

Shad Muhammad Khan
SHAD MUHAMMAD KHAN
ADVOCATE SUPREME COURT OF
PAKISTAN (MANSEHRA)

Attested

16-7-22

Shah Mohammad Hanif
Advocate Supreme Court
of Pakistan

Shah Mohammad Hanif
Advocate Supreme Court
of Pakistan

Shah Mohammad Hanif

1. Name of the party: ...
 2. Name of the party: ...
 3. Name of the party: ...
 4. Name of the party: ...
 5. Name of the party: ...
 6. Name of the party: ...
 7. Name of the party: ...
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 12. Name of the party: ...
 13. Name of the party: ...
 14. Name of the party: ...
 15. Name of the party: ...
 16. Name of the party: ...
 17. Name of the party: ...
 18. Name of the party: ...
 19. Name of the party: ...
 20. Name of the party: ...

ANNEX - 2

Shah Mohammad Hanif (M.L.A.) P.O. Box No. 1000, Islamabad

Sl. No.	Name	Address	City	Phone No.	Remarks
1	Salik	...	Saib Shariq	...	Rest: V/F
2	Mahira b/o Rehman Mahi	...	Malakahi	...	-do-
3	Jawad Ashraf b/o Muhammad Saleh Ashraf	-do-
4	Mohia Khalid b/o Khalid Pervaiz	...	Bhishan	...	"
5	Margia b/o Amin Ahmad	...	Darwazi	...	"
6	Attia Bibi b/o Muhammad Younis	...	Mansobra	...	"
7	Nagma Bibi b/o ... Ali Khan	...	Nattal	...	" Lol. Abad "
8	Ghobar Begum b/o Muhammad Rashid	...	Chakasir	...	" -do-
9	Asma Bibi b/o Habibur Rehman	...	Mansobra	...	" K. K. Jinnah "
10	Nareis Bibi b/o Ali Bahadar	...	Bajo Pagan	...	" -do-
11	Mailsa Shabban b/o Muhammad Sadia	...	Bhishan	...	" Badar Shaba Dadir "
12	Bibi Masim b/o	Bankat	...	" Badar Shaba "
13	Aisa Bibi b/o Mulla Hishan	...	Kakul Alabad	...	" Shaba Jalkat "
14	Shamim Akbar b/o ... Rehman	...	Mansobra	...	" -do-
15	Adil Begum b/o	Chakasir	...	" Jalo Charto "
16	Janet b/o Muhammad Khan	...	Kibhal Surt	...	" Sar. Ghari "
17	Ferhat b/o Rashid Ahmad	...	Talamohad	...	" -do-
18	Yasmin b/o	" -do-
19	Chand Bibi b/o	" -do-
20	Maddia b/o	Mansobra	...	" Saad Jashor "
21	Shakil b/o	Darband	...	" -do-
22	Pervan b/o	Dattaghar	...	" Uchar Gair "
23	Yasmin Bibi b/o	Swara ch	...	" -do-
24	Arhat b/o	" Saki Sar "
25	Mahida b/o	Darband	...	" Shari Naik "
26	Yasmin b/o	d/...	...	" Kanohi "
27	Mahida b/o	Kakul stl	...	" Kharna Khel Dadir "
28	Sajida Bibi b/o	Sagalia	...	" -do-
29	Mahida b/o	" Ghos Harban "
30	Bibi Sharada b/o	Swat	...	" Harban Kot "
31	Bibi b/o	Harband	...	" Sabbar Abad "
32	Asma b/o	Harband	...	" -do-
33	Hamida Bibi b/o	" Lol. Dadir "
34	Farhana b/o	Mansobra	...	" Ghobar Ser "
35	Shahana b/o	" -do-
36	Famat Begum b/o	Chakasir	...	" Mansobra "
37	Shahana b/o	Harband	...	" Shaha "
38	Robinah b/o	" -do-

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Shah Mohammad Khan
 Advocate Supreme Court
 of Pakistan.

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 Advocate Supreme Court
 of Pakistan.

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Page No. 4

- 100. Marim D/O Sanaullah Bhankund GGPS, Kot Raaha
- 101. Shazia Ribi D/O Mir Khan Khawajan " do
- 102. Samina Begum D/O Mubd Shah Chakras " Shtal.
- 103. Masim Akhtar D/O S. Mubd Khan Mera " do
- 104. Bakht JAMIL ARA D/O Tahal Battal " Shah Dhan
Muhammad Khan.
- 105. Rizwana Shahban D/O Abdul Manshura " do
Khalia.
- 106. Nabida D/O Gul Badshah Battal " Bari Shaha.
- 107. Hashiba D/O Tatan Swat " do
- 108. Nazim Ribi D/O Badri Zaman Manshura " Karang Koun
- 109. Noor Jahan D/O Abdul Wahid Battal " do
- 110. Marim Batin D/O Abdul Matin " do " Bagh Sari Gabral
- 111. Chand Ribi D/O Rigan Khan Swat " Shtal.
- 112. Musrat Ribi D/O Rigan Khan Swat " do

DISTRICT EDUCATION
(MALE) PRIMARY, KOT RAHA

A.H. Shad

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61. Ghafar Begum D/O Shariq	Chakrasin	Chakrasin	" -do-
62. Alik	Saidu Sharif	Chakrasin	" -do-
63. Habiba D/O Rehman Nabi	Malakand	" -do-	" -do-
64. Media Khalid D/O Khalid	Pichian	" -do-	" -do-
65. Nargis D/O Amir	Dargai	" -do-	" -do-
66. Attia Bibi D/O Muhammad	Mansehra	" -do-	" -do-
67. Nazma Bibi D/O Ghulam Ali	Chakrasin	" -do-	" -do-
68. Ghafar Begum D/O Muhammad	Chakrasin	" -do-	" -do-
69. Asma Bibi D/O Habibur Rehman	Mansehra	" -do-	" -do-
70. Nargis Bibi D/O Ali Bahadar	Bala Pagan	" -do-	" -do-
71. Naila Shabbir D/O Muhammad	Pichian	" -do-	" -do-
72. Bibi Naqim D/O Syed Ghuman	Pamkot	" -do-	" -do-
73. Asia Bibi D/O Malik Wahid	Kakul	" -do-	" -do-
74. Shamim Akhter D/O Nazim	Mansehra	" -do-	" -do-
75. Nail Begum D/O Nazim	Chakrasin	" -do-	" -do-
76. Janet D/O Muhammad Khan	Chakrasin	" -do-	" -do-
77. Farhat D/O Ghulam Ahmad	Chakrasin	" -do-	" -do-
78. Yasmin D/O Muhammad	Chakrasin	" -do-	" -do-
79. Chand Bibi D/O Rehman Khan	Chakrasin	" -do-	" -do-
80. Nargis D/O Habibur Rehman	Mansehra	" -do-	" -do-
81. Shakila D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
82. Nargis D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
83. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
84. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
85. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
86. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
87. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
88. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
89. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-
90. Ghulam Nabi D/O Ghulam Nabi	Chakrasin	" -do-	" -do-

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Att. Gen.

Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

10m
Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

- Page No. 4
- 101. Morin D/O. Shabir Khan. Bherkunda. G.P.S. Kot. Rasha. Asst: V/U
 - 102. Shazia Bibi D/O Mir. Khar. Khaw. Jan. " " " " " "
 - 103. Samina Begum D/O Mir. Shabir. Chak. Sir. " " " " " "
 - 104. Masim Akbar D/O. S. M. Khan. Mar. " " " " " "
 - 105. Bakht. Jamil. And. D/O. I. H. B. B. " " " " " "
 - 106. Muhammad. Khan. " " " " " "
 - 107. Rizwan. Sha. Khan. D/O. Abdul. Mansur. " " " " " "
 - 108. Khalid. " " " " " "
 - 109. Nabida D/O. Gul. Badshah. " " " " " "
 - 110. Noshiba D/O. Tahir. " " " " " "
 - 111. Fozia Bibi D/O. Abdul. Zaman. Mansur. " " " " " "
 - 112. Noor. Jahan D/O. Abdul. Wahid. Bhattarai. " " " " " "
 - 113. Noorin. Fatim. D/O. Abdul. Matin. " " " " " "
 - 114. Chand. Bibi D/O. Mir. Khan. " " " " " "
 - 115. Muzal. Bibi D/O. Mir. Farid. Mansur. " " " " " "

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DISTRICT EDUCATION OFFICER
(MALE) PRIMARY, KOHISTAN.

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 Advocate Supreme Court
 of Pakistan

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Government of Pakistan... regulations... prescribed...
Departmental selection... merit of...
thereof, report should be submitted to all concerned...
job of the candidate should be taken from him...
He shall be... period of two years...
Departmental... candidate will...
main... terminated on arrival/availability...
or original candidate... checked and verified from the...
service... the... prepared... in all...
aspect... S.W.D. take care of it...
placed on record... obtained from... immediately...
He will be... certificate...
Based on... taken over...
proper relaxation... candidate...
completed... the concerned quarter...
is... completion of tenure will...
.../.../...

He shall be... period of two years...
Departmental... candidate will...
main... terminated on arrival/availability...
or original candidate... checked and verified from the...
service... the... prepared... in all...
aspect... S.W.D. take care of it...
placed on record... obtained from... immediately...
He will be... certificate...
Based on... taken over...
proper relaxation... candidate...
completed... the concerned quarter...
is... completion of tenure will...
.../.../...

931-931

SELECTION OFFICER
PRIMARY DIVISION
ISLAMABAD

15/10/1997

Departmental File

Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

Better Copy ANNEX 'A',
BETTER COPY

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY KOHISTAN

NOTIFICATION

P - 14

Consequent upon the selection by the Departmental Selection Committee District Education Officer Primary Kohistan has been pleased to appoint the following un trained 9(Female) out district candidates in BPS-7 (Rs. 1400/- PM fixed) plus usual allowances as admissible under the rule with effect from the date of their taking over charge against the PTC posts noted against each with the following terms and conditions: -

S.No	Name & father's name	Residence	Place of posting	Remarks
1.	Mariam Zaib D/O Aurangzeb	Labarkot	GGPS KK Ranolia	Against V. Post
2.	Naveeda Rani D/O Fazal-Ur-Rehman	Bherkund	GGPS Bk Ranolia	-do-
3.	Bibi Shahnaz Begum D/O Mahfooz Shah	Darband	GGPS Blian Darot	-do-
4.	Gul Naz D/O Moh'd Ghulam	Oghi	-do-	-do-
5.	Afifa Hussain Khan D/O Ahmad Khan	Khaki	Bar Dher	-do-
6.	Razia Parveen D/o Maqbool-Ur-Rehman	Darband	Kuz Yanjool	-do-
7.	Faiza D/O Abdul Haq	Darband	-do-	-do-
8.	Farha Naz D/O Aurang Zaib	Nawan Sher	Sanagai	-do-
9.	Nisheen Naz D/O Muhammad Aslam	Abbottabad	Singah Sweele	-do-
10.	Zahida Gillani D/O Ghulam Jillani	G. Habibullah	-do-	-do-
11.	Azmat D/O Abdul Jalil	Darband	Galean	-do-
12.	Fozia Nahid D/O Muhammad Siddique	Mansehra	Kat Keval	-do-
13.	Bibi Zaitoon D/O Mian Azizur Rehman	Darband	-do-	-do-
14.	Mehraj D/O Abdul Latif	-do-	Maidan Keyal	-do-
15.	Samina Bibi D/O Abdul Jalil	G.B. Oghi	-do-	-do-
16.	Safina Bano D/O Habib-Ur-Rehman	Darband	Sheshal Keyal	-do-
17.	Farzana Bibi D/O Muhammad Hanif	Puran	-do-	-do-
18.	Pervaiz Bibi D/O Abdul Qayyum	Dher Bala	Gabir Ranolia	-do-
19.				-do-
20.				-do-
21.				-do-
22.				-do-
23.				-do-
24.				-do-

Shad Hussain Khan
Om
Shad Hussain Khan
Advocate Supreme Court
of Pakistan.

25.	Robina Kosar D/O Zulfiqar Ali	Mansehra	GGPS Dhup Gil Jilal	-do-
26	Shazia D/O Khan Bahadar	Darband	Baneel Baba Jee	-do-
27	Bibi Nusrat Sultan D/O Abdur Rehman	-do-	-do-	-do-
28	Tabsum Shah Zaman D/O Shah Zaman	Darband	Kiyal Village	-do-
29	Irum Rana D/O Abdul Haque	-do-	Seri Dubair	-do-
30	Nasim Akhtar D/O Tehmaz Khan	Trangri Bala	Kalas Dubair	-do-
31	Jamila Khatoon D/O Ghulam Hussain	A'Abad	-do-	-do-
32	Shazia Parveen D/O Habib-Ur-Rehman	Darband	Ghawa Sena Khail	-do-
33	Ghazala Nasim D/O Anwar Zeb	Marka Paen	-do-	-do-
34	Rukhsana Nahid D/O Abdul Qayyum	Peshawar	Seri Dubair	-do-
35	Bibi Hatiun Nisa D/O Muhammad Iqbal Shah	Battagram	Baja Lahi	-do-
36	Samina Habibullah D/O Habibullah	-do-	-do-	-do-
37	Rashida Begum D/O Muhammad Sharif	-do-	Sofia Dara	-do-
38	Asia Jabeen D/O Roshan Muhammad	Battal	-do-	-do-
39	Shazia D/O Bakhat Rehman	Swat	Pora Ghari	-do-
40	Samia Tabassum D/O Abdul Aziz	Mansehra	-do-	-do-
41	Farzana Abbasi D/O Fazal Rehman	-do-	Shamal Guli Mehrin	-do-
42	Musarrat Ara D/O Abdul Zahir	Peshawar	D.M. Khel	-do-
43	Musarrat Bostan D/o Bostan	Darband	Samara Abad	-do-
44	Bibi Mubarka D/O Ghulam Rabbani	Bherkund	-do-	-do-
45	Nahida Anjum D/O Khanizaman	Mansehra	Kero Sar	-do-
46	Nayir Sultana D/O Gul Dad Khan	Oghi	-do-	-do-
47	Neer Sultana D/O Abdul Aziz	G.H.Ullah	Anwar Abad S. Kot	-do-
48	Bibi Rehmat D/O A. Aurangzeb	Dilomani	-do-	-do-
49	Saira Bano D/O Sarfraz Khan	Mansehra	Majawar Abad	-do-
50	Liaqat Bibi D/O Mian Said	Lilawan	Bar Gabur	-do-

Shah Mohammad Khan
Shah Mohammad Khan
 Advocate Supreme Court
 of Pakistan.

51	Noorin Bibi D/O Jehangir Khan	Battal	Kharat	-do-
52	Attia Gul D/O Abdul Latif	Susal	-do-	-do-
53	Bibi Razia Sultana D/O Habib-Ur-Rehman	Mansehra	M,iskeen Abad	-do-
54	Kosar Parveen D/O Muhammad Shafi	Khalabat	Behram Abad	-do-
55	Sahira D/O Nisar Ahmed	Chakasir	Behram Abad	-do-
56	Ali Begum D/O Pervaiz Khan	A'Abad	-do-	-do-
57	Bibi Sajida D/O Qalandar Khan	Trappi	Maidan Kalai	-do-
58	Anila Mujeeb D/O Mujeebur Rehman	Khaki	-do-	-do-
59	Shaheen Bibi D/O Muntazar Khan	Sherpur	Sharyal Maidan	-do-
60.	Shagufta Begum D/O Sarwar Khan	Kot Janceebullah	-do-	-do-
61.	Akhtar Begum D/O Sher Malik	Saidu Sharif	GGPS Haran	-do-
62	Tahira D/O Rehman Nabi	Malakand	-do-	-do-
63	Jawaria Ashraf D/O Muhammad Ashraf	Salhad A'Abad	Datt	-do-
64	Nadia Khalid D/O Khalid Pervaiz	Bissian	-do-	-do-
65	Nargis D/O Amir ahmed	Dargai	Jheem Gali	-do-
66	Attia Bibi D/O Muhammad Younis	Mansehra	-do-	-do-
67	Nazma Bibi D/O Dher Ali Khan	Battal	Lal Abad	-do-
68	Gohar Begum D/O Muhammad Rashid	Chakasir	-do-	-do-
69	Asma Bibi D/O Habibur Rehman	Mansehra	K.K. Jamra	-do-
70	Nargis Bibi D/O Ali Bahader	Baja Paeen	-do-	-do-
71	Naila Shaheen D/O Muhammad Sadiq	Bissian	Badar Shaha Dadir	-do-
72	Bibi Nasim D/O Sher Zaman	Ramkot	Badar Shoba	-do-
73	Asia Bibi D/O Matloob Shah	Kakul A'Abad	Shoba Jalkot	-do-
74	Shamim Akhtar D/O Fazal-Ur-Rehman	Mansehra	-do-	-do-
75	Adil Rehman D/O Behram Khan	Chakaiser	Jalo Chatro	-do-
76	Janat Ara D/O Muhammad Khan	Khabal Swat	Sat Ghari	-do-
77	Farhat Naz D/O Bashir Ahmed	Islamabad	-do-	-do-
78	Yasmin D/O Muhammad Afzal	Khabal Swat	Sazin	-do-

Shah Mohammad
Shah Mohammad
 Advocate Supreme Court
 of Pakistan

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79	Chand Bibi D/O Roshan Khan	Baffa	-do-	-do-
80	Nargis Khatoon D/O Habib-Ur-Rehman	Mansehra	Savel Jashoi	-do-
81	Shakila D/O Sher Bahadur	Darband	-do-	-do-
82	Parveen D/O Pir Badshah	Battagram	Uchar Sair	-do-
83	Yasmin Bibi D/O Kala Khan	Shergarh	-do-	-do-
84	Farhat Jabeen D/O Habibur Rehman	Haripur	Saki Sar	-do-
85	Fariha Habib D/O Habibur Rehman	Darband	Sheri Baik	-do-
86	Yasmin Akhtar D/O Abdul Ghafoor	S/Sharif	Kanchi	-do-
87	Rubina Jan D/O Muhammad Sarwar	Kakuk Atd:	Khirma Khel Dadir	-do-
88	Sajida Bibi D/O Abdul Ghani	Shehlia	-do-	-do-
89	Nelo Far D/O Sohrab Khan	Tarha Bala	Ghee Harban	-do-
90	Bibi Sandar D/O Bakht Karim	Swat	Harban Kot	-do-
91	Bibi Hafiza D/O Malook akbar	Bherkund	Saboor Abad	-do-
92	Aama Noor D/O Manzoor Hussain	-do-	-do-	-do-
93	Hamida Bibi D/O Sultan Mohd	Oghi	Lohi Dadir	-do-
94	Farkhanda Rehman D/O Attiq-Ur-Rehman	Mansehra	Gabber Sar	-do-
95	Shabana Nasim D/O Abdur Rehman	A'Abad	-do-	-do-
96	Niamat Begum D/O Muhammad Sohrab	Chakaiser	Morogah	-do-
97	Shaheena Naz D/O Manzoor Hussain	Bherkund	Shahe	-do-
98	Rubina Habib D/O Habibur Rehman	Dargai	-do-	-do-
99	Shagufta Rehman D/O Sarwar Khan	Kot Najeebullah	-do-	
100	Norin D/O Shahzaman	Bherkund	GGPS Kot Basha	-do-
101	Shazia Bibi D/O Mir Akbar	Khawajgan	-do-	-do-
102	Samina Begum D/O Muhd Shah	Chakaisir	Shatial	-do-
103	Nasim Akhtar D/O S. Muh'd Khan	Mera	-do-	-do-
104	Bakht Jamil Ara D/O Iqbal Muhammad Khan	Battal	Shah Dhar	-do-
105	Rizwana Shaheen D/O Abdul Khaliq	Mansehra	-do-	-do-
106	Nahida D/O Gul Badshah	Battal	Bari Shaha	-do-

Att. Genl.
M.
Shah Mohammad Khan
Advocate Supreme Court
of Pakistan

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107	Noshiha D/O Totan	Swat	-do-	-do-
108	Fazia Bibi D/O Badri Zaman	Mansehra	Karang Kaun	-do-
109	Noor Jehan D/O Abdul Waheed	Battagram	-do-	-do-
110	Noorin Matin D/O Abdul Matin	-do-	Bagh Seri Gabral	-do-
111	Chand Bibi D/O Tizam Khan	Swat	Seglo	-do-
112	Nusrat Bibi D/O Moh'd Fareed	Mansehra	-do-	-do-

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) PRIMARY, KOHISTAN

A. H. Steel
Om.
Shah Mohammad Khan
Advocate Supreme Court
of Pakistan.

61.	Akhtar Begum D/O Sher Malik	Saidu Sharif	GGPS Haran	-do-
62	Tahira D/O Rehman Nabi	Malakand	-do-	-do-
63	Jawaria Ashraf D/O Muhammad Ashraf	Salhad A'Abad	Datt	-do-
64	Nadia Khalid D/O Khalid Pervaiz	Bissian	-do-	-do-
65	Nargis D/O Amir ahmed	Dargai	Jheem Gali	-do-
66	Attia Bibi D/O Muhammad Younis	Mansehra	-do-	-do-
67	Nazma Bibi D/O Dher Ali Khan	Battal	Lal Abad	-do-
68	Gohar Begum D/O Muhammad Rashid	Chakasir	-do-	-do-
69	Asma Bibi D/O Habibur Rehman	Mansehra	K.K. Jamra	-do-
70	Nargis Bibi D/O Ali Bahader	Baja Paen	-do-	-do-
71	Naila Shaheen D/O Muhammad Sadiq	Bissian	Badar Shaha Dadir	-do-
72	Bibi Nasim D/O Sher Zaman	Ramkot	Badar Shoba	-do-
73	Asia Bibi D/O Matloob Shah	Kakul A'Abad	Shoba Jalkot	-do-
74	Shamim Akhtar D/O Fazal-Ur-Rehman	Mansehra	-do-	-do-
75	Adil Rehman D/O Behram Khan	Chakaiser	Jalo Chatro	-do-
76	Janat Ara D/O Muhammad Khan	Khabal Swat	Sat Ghari	-do-
77	Farhat Naz D/O Bashir Ahmed	Islamabad	-do-	-do-
78	Yasmin D/O Muhammad Afzal	Khabal Swat	Sazin	-do-
79	Chand Bibi D/O Roshan Khan	Baffa	-do-	-do-
80	Nargis Khatoon D/O Habib-Ur-Rehman	Mansehra	Savel Jashoi	-do-
81	Shakila D/O Sher Bahadur	Darband	-do-	-do-
82	Parveen D/O Pir Badshah	Battagram	Uchar Sair	-do-
83	Yasmin Bibi D/O Kala Khan	Shergarh	-do-	-do-
84	Farhat Jabeen D/O Habibur Rehman	Haripur	Saki Sar	-do-
85	Fariha Habib D/O Habibur Rehman	Darband	Sheri Baik	-do-
86	Yasmin Akhtar D/O Abdul Ghafoor	S/Sharif	Kanchi	-do-
87	Rubina Jan D/O Muhammad Sarwar	Kakuk Atd:	Khirma Khel Dadir	-do-
88	Sajida Bibi D/O Abdul Ghani	Shehlia	-do-	-do-

Att. Gen.
 Shad Mohammad Khan
 Advocate Supreme Court
 of Pakistan

89	Nelo Far D/O Sohrab Khan	Tarha Bala	Ghee Harban	-do-
90	Bibi Sandar D/O Bakht Karim	Swat	Harban Kot	-do-
91	Bibi Hafiza D/O Malook akbar	Bherkund	Saboor Abad	-do-
92	Aama Noor D/O Manzoor Hussain	-do-	-do-	-do-
93	Hamida Bibi D/O Sultan Mohd	Oghi	Lohi Dadir	-do-
94	Farkhanda Rehman D/O Attiq-Ur-Rehman	Mansehra	Gabber Sar	-do-
95	Shabana Nasim D/O Abdur Rehman	A'Abad	-do-	-do-
96	Niamat Begum D/O Muhammad Sohrab	Chakaiser	Morogah	-do-
97	Shaheena Naz D/O Manzoor Hussain	Bherkund	Shahe	-do-
98	Rubina Habib D/O Habibur Rehman	Dargai	-do-	-do-
99	Shagufta Rehman D/O Sarwar Khan	Kot Najeebullah	-do-	
100	Norin D/O Shahzaman	Bherkund	GGPS Kot Basha	-do-
101	Shazia Bibi D/O Mir Akbar	Khawajgan	-do-	-do-
102	Samina Begum D/O Muhd Shah	Chakaisir	Shatial	-do-
103	Nasim Akhtar D/O S. Muh'd Khan	Mera	-do-	-do-
104	Bakht Jamil Ara D/O Iqbal Muhammad Khan	Battal	Shah Dhar	-do-
105	Rizwana Shaheen D/O Abdul Khaliq	Mansehra	-do-	-do-
106	Nahida D/O Gul Badshah	Battal	Bari Shaha	-do-
107	Noshiha D/O Totan	Swat	-do-	-do-
108	Fazia Bibi D/O Badri Zaman	Mansehra	Karang Kaun	-do-
109	Noor Jehan D/O Abdul Waheed	Battagram	-do-	-do-
110	Noorin Matin D/O Abdul Matin	-do-	Bagh Seri Gabral	-do-
111	Chand Bibi D/O Tizam Khan	Swat	Seglo	-do-
112	Nusrat Bibi D/O Moh'd Fareed	Mansehra	-do-	-do-

CONDITIONS

Sd/-
Shad Matin Khan
 DISTRICT EDUCATION OFFICER
 (MALE) PRIMARY, KOHISTAN
 Advocate Supreme Court
 of Pakistan.

(Faint signature and stamp)

- 1) She will be governed by such rules and regulations as may prescribed by the Government from time to time for the category of the Govt: servant which they belong.
- 2) Her services will be liable to termination on one month notice from either side in case of resignation without notice one month pay will be forfeited in lieu thereof.
- 3) She should join the post within one month of the issue of this notification.
- 4) Her seniority will be terminated in accordance with the merit of departmental selection committee.
- 5) Charge report should be submitted to all concerned especially to DEO(M) Pwy: Kohistan. Charge should be taken from a notable person of the concerned school.
- 6) She should be on prohibition for a period of two years have to pass departmental exam. In case of candidate fail to qualify the departmental exam and, will be given one month chance. If she fails again them her service will be terminated on arrival/ availability of trained teacher.
- 7) Her original certificate should be checked and verified from the concerned Board/College before handing over charge.
- 8) Service Book of the teacher must be prepared completed in all respect before handing over charge. SDEO(F) take care of it.
- 9) The declaration of assets should be obtained from her immediately and placed on record.
- 10) She should to produce her Health and Age certificate from Medical authority concerned before taking over charge.
- 11) Charge should be given to the over age candidate. Her case for Upper Age Relaxation should be sent to the concerned quarter.
- 12) Efforts for transfer before the completion of tenure will disqualify from service.
- 13) No TA/DA is allowed to any one.
- 14) An undertaking shall be obtained from Master and Degree Holder that she will be served the Department for at least five years.
- 15) In case of any appointed as untrained teacher will have to pass the requisite training examination within a period of 4 years failing which service will be terminated.

Sd/--

(SAEED AHMAD)
DISTRICT EDUCATION OFFICER
(MALE) PRIMARY KOHISTAN

Endst. No. 811-931

Dated Kohistan the 31.10.1997

- 1) P/S to Secretary to Govt: of NWFP Education Department Peshawar
- 2) Director Primary Education NWFP Peshawar
- 3) District Accounts Officer, Kohistan
- 4) Candidate concerned
- 5) O.O. File

AH Steel
AM
Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

Sd/--

(SAEED AHMAD)
DISTRICT EDUCATION OFFICER
(MALE) PRIMARY KOHISTAN

ANNEX 2 B

چارچرٹ

22

حسب الحکم جناب جسٹس ایچ آر ایچ ایچ (سرور) کوہستان داسو۔

تقریباً 811-931 مورثہ 31-10-1997

کی تعمیل میں اچ مورثہ 01-11-1997 کو قبل از دوپہر گورنمنٹ گزٹ

پبلشنگ ہاؤس کے تحت جاری کیا گیا۔

پب ڈی سی (P.T.C) کے تحت جاری کیا گیا۔

باقی اس کے ساتھ دیا گیا ہے۔

تفصیلی چارج رپورٹ دیکھیں۔

Said Saif
چارج گورنمنٹ

نواز
چارج گورنمنٹ

Seen
Attested
Divisional Education Officer
Advocate Supreme Court
of Pakistan

20-11-1997

ANNEX - C^{PP}



**OFFICE OF DISTRICT EDUCATION OFFICER (FEMALE)
KOHISTAN**

P-23

OFFICE ORDER/REMOVAL FROM SERVICE

01. WHEREAS as per the numerous complaints received to the undersigned through various means the following female teachers remained absent from their duties without any prior permission or leave for several years.
02. WHEREAS their schools remained closed/Non-functional during the repeated visits of EMA.
03. WHEREAS they were reported absent by EMA time and again during the visits of the concerned DGMAs.
04. WHEREAS they put their fake attendance in the school registers at their home.
05. WHEREAS the concerned ASDEOs were directed to verify their absenteeism.
06. WHEREAS the concerned ASDEOs confirmed/verified their absenteeism as per their report.
07. WHEREAS show cause notices were issued to them vide the references made against their names.
08. WHEREAS they failed to reply their show causes within the stipulated period.
09. WHEREAS they failed to avail the chance of personal hearing.

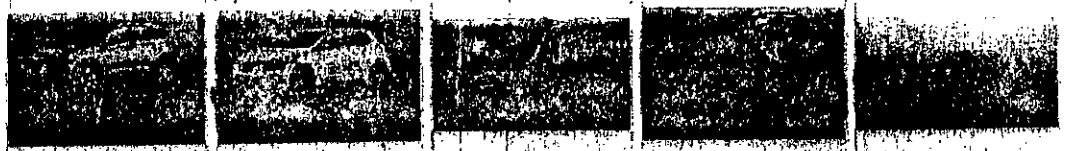
Therefore the undersigned being the competent authority, do hereby impose Major Penalty of Removal from Service, upon the following female teachers under Rule 4(b) of E&D Rules 2011, with immediate effect, in the interest of public service.

S.No	Name of Teacher with designation	Name of School	Show cause reference	Remarks
01	Kalsoom Bibi PST	GGPS Tayyab Abad	No.4044-49 dated:02/08/2021	
02	Banazir PST	GGPS Lohi Dadir	No.4050-55 dated:02/08/2021	
03	Saira Bano PST	GGPS Chuchang	No.4062-67 dated:02/08/2021	
04	Abida Qalandar PST	GGPS Maldan Tayal	No.4074-79 dated:02/08/2021	
05	Shainaz PST	GGPS Faridoon Abad	No.4086-91 dated:02/08/2021	
06	Najma PST	GGPS Dhop Lohi	No.4098-4103 dated:02/08/2021	
07	Nasreen Basheer PST	GGPS Sheshrat	No.4104-09 dated:02/08/2021	
08	Nasreen Akhtar PST	GGPS Sheshrat	No.4110-15 dated:02/08/2021	
09	Paryoon Akhtar PST	GGPS Pari Kandia	No.4116-21 dated:02/08/2021	
10	Fazilat Begum PST	GGPS Sigloo	No.4134-39 dated:02/08/2021	
11	Kalsoom Bibi PST	GGPS Sigloo	No.4140-45 dated:02/08/2021	

A.H. Saeed
Shah Iqbal Khan
Advocate Supreme Court
of Pakistan

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12	Musarat Gul PST	GGPS Sheshrat	No.4146-51 dated:02/08/2021	
13	Gul Nar PST	GGPS Sheshrat	No.4158-63 dated:02/08/2021	



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10	Fazilat Begum PST	Kandia GGPS Sigloo	dated:02/08/2021 No.4134-39 dated:02/08/2021	
11	Kalsoom Bibi PST	GGPS Sigloo	No.4140-45 dated:02/08/2021	

Scanned with CamScanner

12	Musarat Gul PST	GGPS Sigloo	No.4146-51 dated:02/08/2021	
13	Gul Nar PST	GGPS Thooli	No.4158-63 dated:02/08/2021	
14	Asmat Bibi PST	GGPS Karang	No.4170-75 dated:02/08/2021	
15	Samina Kosar PST	GGPS Kal Rustum Abad	No.4205-10 dated:02/08/2021	

MUHAMMAD AMIN
District Education Officer
(Female) Kohistan

Endstt; No. 4607-16 DEO (F) KH Dated: 09/09/2021

Copy of the above forwarded to the:-

01. PS to Secretary Elementary & Secondary Education Department KPK Peshawar.
02. PA to Director Elementary & Secondary Education KPK Peshawar.
03. Deputy Commissioner Kohistan Upper.
04. District Monitoring officer Kohistan Upper.
05. District Accounts Officer Kohistan Upper.
06. SDO/DDO (F) concerned with the directions to stop their pay and make necessary entries in the service books.
07. ASDEO Circle concerned.
08. PA to DEO (F) local office.
09. Teachers concerned.
10. Office file.

District Education Officer
(Female) Kohistan

Shad Mohammad Khan
Advocate Supreme Court
of Pakistan.

ANNEX = ۵۲
بخدمت جناب ڈائریکٹر صاحب

محکمہ تعلیم صوبہ سرحد
P-26

KPK پشاور

عنوان: یاد دہانی حکم براپیل برخاستگی آرڈر (F) DEO داسوکوہستان

جناب عالی!

گزارش ہے کہ سائلہ نے اپنی برخاستگی کے آرڈر کے خلاف آپ کے
ہاں اپیل مورخہ 21-9-2021 کو پیش کی تھی جس کی فوٹو اسٹیٹ الف
درخواست ہذا کے ساتھ ہے۔ برائے ملاحظہ

مگر تا حال آپ کی جانب سے میری اپیل پر کوئی حکم نامہ فیصلہ صادر نہیں
ہوا۔ سائلہ کی پریشانی کو مد نظر رکھتے ہوئے میری اپیل پر ہمدردانہ غور فرماتے
ہوئے فیصلہ احکمنامہ صادر فرمایا جائے۔

المرقوم 21-6-2022

شکریہ

Saita Bano

سائرہ بانو دختر سرفراز خان

گورنمنٹ گرلز پرائمری سکول چوچنگ

داسوکوہستان

Attested
by

Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

SHAD MUHAMMAD KHAN

Advocate Supreme Court of Pakistan,
District Courts, Mansehra

ANNEX 2 F,
PP

Ref No. _____

Dated 30.6.2022

Through Registered Cover

To,

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa Peshawar

P - (27)

Subject: - LEGAL NOTICE

Respected Sir,

I have been engaged by Mst. Saira Bano daughter of Sarfraz, resident of Village Reerh, Tehsil and District Mansehra Ex-PTC Teacher Govt. Girls Primary School Chochang Dassu (Kohistan) as counsel to serve you a legal notice.

- 1) That, my client Mst. Saira Bano PTC Teacher was served in District Kohistan who was dismissed from service. She was never afforded any requisite opportunities laid down by law. After her dismissal from service, the appellant submitted an appeal on 21.09.2021 for her reinstatement but, the fate of her appeal was neither decided nor any information was communicated to my client in this respect.

Shad Mohammad Khan
Advocate Supreme Court
of Pakistan

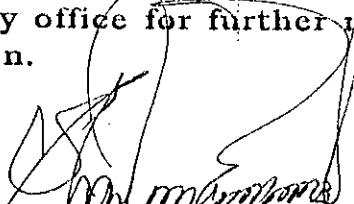
28

2) That, my client submitted a reminder for the disposal of her appeal on 23.06.2022 but despite reminder her appeal has neither been decided nor appellant was communicated the fate of appeal.

(The copy of appeal and reminder are annexed herewith).

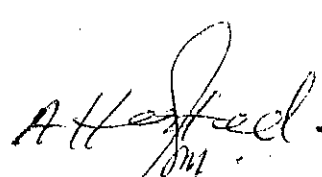
You are, therefore, requested to decide the appeal of my client in one way or other and to communicate the fate of her appeal so that my client could approach the competent court of law.

Note: - A copy of this notice is retained in my office for further necessary action.


SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

30.6.2022

SHAD MUHAMMAD KHAN
ADVOCATE
SUPREME COURT OF PAKISTAN


Shad Muhammad Khan
Advocate Supreme Court
of Pakistan



M No.

39

S No. 5612

Fee Rs. 100/-

No.

10 - 2 - 7 - 0 - 1

Name of Advocate

شاد محمد خان

وکالت نامہ



General Secretary District 2022-28

29

بعدالت: جناب چیئر مین صاحب سروس ٹریڈ یونٹ پ. اے. اے. لاہور

عنوان: صفا سائڈ بانڈ نام: D.F.O (فی میل) کوہستان

منجانب: ایڈوانٹس نوٹیت مقدمہ: سروس ٹریڈ یونٹ

باعث تحریر آئندہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے خوردی و جوا پر میں یہ مقام اسٹے آباد کے لئے جناب شاد محمد خان ایڈووکیٹ سروس ٹریڈ یونٹ کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر جیسی چھوڑ دیکھ کر یا نہ دیکھ کر اسٹے آباد کے لئے اور بونڈ پکار کے جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پچھری کے علاوہ کسی اور جگہ پچھری کے مقررہ اوقات سے پہلے یا پھر روز تعطیل کو وی کی کرنے سے مجاز نہ ہوں گے۔ اگر مقدمہ پچھری کے علاوہ کسی اور جگہ سماعت ہوا یا پچھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء، ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست بیان حلفی و تصدیق کرنے اور اسپر دستخطا کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دائر نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا نظر ذمہ درخواست حکم اتنا ہی یا فیصلہ قبل از ڈگری اجراء سے ڈگری بھی وکیل موصوف کو بشرط ادا ہوگی علیحدہ محتات ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بددراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیر سٹو بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کو پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ برداشت وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے اور دستخطا اٹھوٹھا ثبت کر دیا ہے تاکہ سند رہے۔

صفا سائڈ بانڈ دفتر سروس ٹریڈ یونٹ لاہور - 5

20

ACCEPTED

SHAD MUHAMMAD KHAN
ADVOCATE
SUPREME COURT OF PAKISTAN

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1118 /2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/07/2022	<p>The appeal of Mst. Saira Bano received today by post through Mr. Shad Muhammad Khan Advocate. It is fixed for preliminary hearing before the touring Single Bench at A.Abad on _____ . Notices be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p>
2-		<p style="text-align: right;">REGISTRAR</p>