

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: **ROBIA SHAMS** V/S **EDUCATION DEPTT:**

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: NOOR MOHAMMAD KHATTAK	✓	
2	Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: **NOOR MOHAMMAD KHATTAK**

Signature: _____

Dated: _____

2021

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: _____ OF 2021

Robia Shams (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt. (RESPONDENT)
(DEFENDANT)

I/We Robia Shams

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021

Robia Shams
CLIENTS

ACCEPTED
Noor Mohammad Khattak
NOOR MOHAMMAD KHATTAK
Kamran Khan
KAMRAN KHAN
Umer Farooq Mohmand
UMER FAROOQ MOHMAND
Said Khan
SAID KHAN
Haider Ali
HAIDER ALI
Khanzad Gul
KHANZAD GUL

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 7777 /2021

ROBIA SHAMS

V/S

EDUCATION DEPTT:

I N D E X

S.N O	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1-3
2	Affidavit	4
3	Advertisement	A	5-9
4	Education testimonials	B	10-20
5	Notification	C	21-22
6	Order	D	23
7	Impugned notification	E	24
8	Departmental appeal	F	25-26
14	Wakalat Nama	27

Dated: 11.2021

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE

FLATE NO. 04, 2ND FLOOR,
JUMA KHAN PLAZA, NEAR FATA SECRETARIAT,
WARSAK ROAD, PESHAWAR

0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. _____/2021

Mst: Robia Shams, SST (BPS-16),
GGHSS Ghallanai, District Mohmand.

..... **APPELLANT**

VERSUS

- 1- The Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Chairman Khyber Pakhtunkhwa Public Service Commission, Fort Road, Peshawar.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 26-07-2021 WHEREBY THE APPOINTMENT NOTIFICATION DATED 06-08-2012 HAS BEEN DISOWNED AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the impugned Notification dated 26.07.2021 may very kindly be set aside and the appellant may kindly be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favour of the appellant.

R. SHEWETH:

ON FACTS:

- 1- That the Khyber Pakhtunkhwa Public Service Commission advertised various posts including the post of SST (G) (BPS-16), the appellant having the requisite qualification applied for the said post and resultantly recommended by the KP public Service Commission. Copies of the advertisement and educational testimonials are attached as annexure **A and B.**
- 2- That in light of the ibid recommendation the respondents appointed the appellant as Secondary School Teacher (BPS-16) vide Notification dated 30.01 -2012. That in response the appellant got herself medically examined and also submitted

arrival report. That where after the appellant was adjusted at GGHSS Ghallanai, District Mohmand vide Notification dated 16.02.2012 and in response the appellant started performing her duty at the concerned station quite efficiently and up to the entire satisfaction of her superiors. Copies of the Notification and order are attached as annexure....**C & D.**

- 3- That after proper verification of educational antecedents and service documents the salary of the appellant has been released/started by the concerned authorities. That it is pertinent to mention that during the said period the appellant has successfully completed his probationary period and as such the Department confirmed the appellant against the post of SST (BPS-16).
- 4- That unfortunately during service vide impugned Notification dated 26.07.2021 the appointment Notification dated 30.01.2012 of the appellant has been disowned by the respondents without any reason and clear justification. Copy of the impugned Notification is attached as annexure **E.**
- 5- That feeling aggrieved the appellant filed Departmental appeal but no reply has been received so far. Hence the instant appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure **F.**

GROUND:

- A- That the impugned order dated 26.07.2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned Notification dated 26.07.2021 has been issued by the concerned authority in violation of the principle of locus Poenitentiae.
- D- That no charge sheet and statement of allegation has been issued by the concerned authority before issuing the impugned Notification dated 26.07.2021.
- E- That no show cause notice has been issued to appellant before issuing the impugned Notification dated 26.07.2021.

- F- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.
- G- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 26.07.2021.
- H- That the appellant was also assigned seniority in the cadre of SST (BPS-16) and was due for promotion to the next higher scale but unfortunately the authority without any reason & rhyme and without following codal formalities straight away issued the impugned Notifications dated 26.07.2021 whereby the appointment Notification of the appellant dated 30.01.2012 has been disowned by the authority.
- I- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 26.07.2021.
- J- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

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

Dated: ____ . ____ .2021

APPELLANT

ROBIA SHAMS

THROUGH:

NOOR MOHAMMAD KHATTAK

SAID KHAN

&

HAIDER ALI

ADVOCATES, PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2021

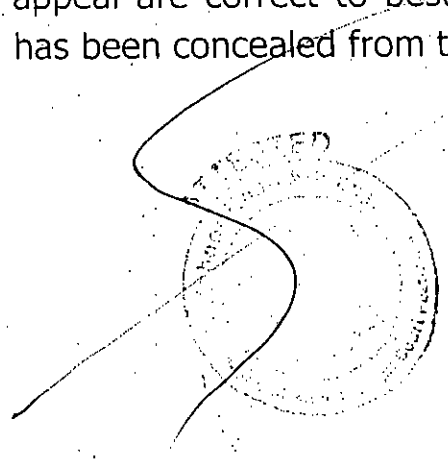
ROBIA SHAMS

VS

EDUCATION DEPTT:

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



Robia Shams
DEPONENT

CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellatant in the instant matter before this Honorable Service Tribunal.

Robia Shams
CERTIFICATION

ANNEXURE "A"

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt;

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

5

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A. domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01)

One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes.

ALLOCATION: Merit.

(S.No. 02)

Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03)

Five (05) Posts of Data Entry Operators.

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute. (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes.

ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

ATTESTED

DIRECTORATE OF INDUSTRIES, COMMERCE, MINERAL DEV, LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04)

One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi-Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male.

ALLOCATION: NOTE: In case of non-availability of candidates possessing the

ATTESTED

6

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics: The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-17 ELIGIBILITY: Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5	Islamiyat	02	Merit Quota
6	Pak. Study	03	Merit Quota
7	History-Cum-Civics	02	Merit Quota
8	Economics	02	Merit Quota
9	English	02	Merit Quota
10	Statistics	02	Merit Quota
11	Maths	02	Merit Quota
12	Biology	02	Merit Quota
13	Chemistry	02	Merit Quota
14	Physics	02	Merit Quota

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION: Merit.

(S.No. 54) Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. PAY SCALE: BPS-16 ELIGIBILITY: Male.

ALLOCATION: Merit.

ATTESTED

ATTESTED

(No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.1s (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physis, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physis, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physis, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

ATTESTED

8

(S.No. 66) Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.
AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Male.
ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

(S.No. 67) One (01) Post of Female office Assistant.

QUALIFICATION: Bachelor degree from recognized University.
AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.
ALLOCATION: Merit.

CORRIGENDUM

1. The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advt. No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and upper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

ATTESTED

- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
 - (a) Written Test in the Subject.
 - (b) General Knowledge or Psychological General Ability Test.
 - (c) Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- (i) Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Manshra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

ATTESTED

ATTESTED

(Atta Ur Rehman)
Secretary
NWFP Public Service Commission
2-Fort Road Peshawar Cantt: Ph: 9212962

10

ANNEXURE B

University of Peshawar
(Pakistan)

Session ANNUAL, 2008

ROBIA SHAMS DAUGHTER of SHAMS UR REHMAN and a student
of CHARSADDA COLLEGE OF EDUCATION having passed the prescribed Examination
held in AUGUST, 2008 is this day admitted by the University of Peshawar to the Degree of

Bachelor of Education

In the FIRST Division in Theory

In the FIRST Division in Teaching Practice

In the FIRST Division in Aggregate

Passed also in FIRST as an Optional Subject

The Examination was taken as a whole / in parts

Serial No. 010589

Registration No. 2006-600PN-281

Roll No. 705

Result declared on 06 JAN 2009



SAMINA KHAN
Lecturer in Urdu / BPS-17
G.D.C. Dara Zinda
F.R. D. Khan

Registrar

Countersigned

M. Q. J.
Vice-Chancellor



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MARDAN, N.W.F.P. PAKISTAN

11

S. No. MB 000108

Reg. No. 602

Registration No. 122-B/DCP-2003

PROVISIONAL AND DETAILED MARKS CERTIFICATE
INTERMEDIATE (SUPPLY) EXAMINATION - 2005
PRE-ENGINEERING (Part-II)

RUBIA SHAMS Son/Daughter of AMS UR REHMAN
of Institution/District NOWSHERA
has secured the marks shown against each subject in the High Secondary School Examination held in the
month of NOVEMBER 25 PRIVATE Candidate.

Subjects	Marks	Part-I				Marks Obtained	
		Theory		Pract		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	30	--	33	--	66	Sixty-Six
Urdu	200	60	--	60	--	126	One Hundred Twenty-Six
Islamic Education	50	35	--	--	--	35	Thirty-Five
Islamic Studies	50	--	--	38	--	38	Thirty-Eight
Mathematics	200	--	--	28	--	72	Seventy-Two
Physics	200	25	21	47	20	113	One Hundred Thirteen
Chemistry	200	30	--	32	20	86	Eighty-Six
Total: 1100						536-D	Five Hundred Thirty-Six Only
Remarks:							

Prepared by

Checked by

Result Date: 23 January, 2006

Note: Error/Omission accepted. Any mistake in above particulars must be reported within 30 days after declaration of result.

Controller of Examinations
BISE Mardan

Principal
G.G.H.S.S Ghallanai
District Mohmand

12

BOARD OF INTERMEDIATE & SECONDARY EDUCATION
MARDAN

DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
(SCIENCE GROUP)
SESSION 2003 ANNUAL/SUPPLEMENTARY



S.No. MBS 7558

Name Rohia Chams

Father's Name Sham-ur-Rahman Roll No: 47058

Subjects	Total Number of Marks Alloted	Marks Obtained			
		Theory	Practical	In Figures	In Words
1. English	150			65	
2. Urdu	150			85	
3. Islamiyat	75			43	
4. Pakistan Studies	75			29	
5. Mathematics	100			70	
6. Physics	100			55	
7. Chemistry	100	49	17	66	
8. Biology	100			53	
Total	850			486	

Errors and omissions excepted.

Total Marks in Words Four hundred and eighty six

Prepared by [Signature]

Checked by [Signature]

Date of Preparation 28 JUN 2003



Controller of Examinations
Board of Intermediate & Secondary Education
MARDAN

RECEIVED

13



University of Peshawar

(Pakistan)

Session SUPPLY, 2007

ROBIA SHAMS DAUGHTER

of

SHAMS UR REHMAN

and a student

of GOVT. GIRLS DEGREE COLLEGE FIR FIAI NOWSHERA

having passed the prescribed examination

held in JAN. 2007

is this day admitted by the University of Peshawar

to the Degree of

Bachelor of Science

in the FIRST Division

The examination was taken as a whole/in parts

Serial No. 037275

Registered No. 2005-660F/N-281

Roll No. 2993

Result Declared on 20 APRIL 2008



[Signature]
SAMINA KHAN
Lecturer in Urdu BPS-17
G.D.C. Dara Zind
F.P. D.L. Khan

[Signature]
Registrar

Countersigned

[Signature]
Vice-Chancellor

0012780

14



University of Peshawar

Pakistan
Detailed Marks Certificate
Bachelor of Education
(B.Ed)

Annual Examination 2008

Charsadda College of Education



Regular

Name: ROBIA SHAMS

Gender: Female Roll No: 703

Father's Name: SHAM SUR REHMAN

Registration No: 2006-CGCPN-281

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Educational Psychology, Guidance & Counselling	100	68	Sixty Eight
Perspectives of Education & Contemporary Social Issues	100	74	Seventy Four
Curriculum and Instruction	100	44	Forty Four
Islamic and Islamic Ethics / Islamic History (for Non Muslims)	50	30	Thirty Only
School Organization and Classroom-Management	100	60	Sixty Only
Functional English	50	41	Forty One
Evaluation Techniques	100	62	Sixty Two
Methods of Teaching - I - English	100	70	Seventy Only
Methods of Teaching - II - Math	100	58	Fifty Eight
elective Subject - Foundation of Education	100	44	Forty Four
Practice of Teaching	200	150	One Hundred Fifty Only
	1100	701	Seven Hundred and One

Errors & omissions are subject to subsequent publication

Chances Available: 1

Examination held From 07-Aug-2008 to 01-Sep-2008

Result Declared on Tuesday, January 6, 2009

Printed on 11 Jan 2009

5:14 pm

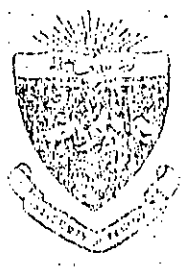
Prepared by Computer Cell

(Dr. Mohammad Shafi)
ADDITIONAL CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

15

No. 017381

UNIVERSITY OF PESHAWAR



Pakistan Detailed Marks Certificate Bachelor of Science (B.S.C) Part-II Supply Examination 2007



Govt. Girls Degree College, Pir Piai, Nowshera

Regular

Name: ROBIA SHAMS

Gender: Female Roll No: 2993

Father's Name: SHAM SUR REHMAN

Registration No: 2006-GGCPN-281

Division: Ist

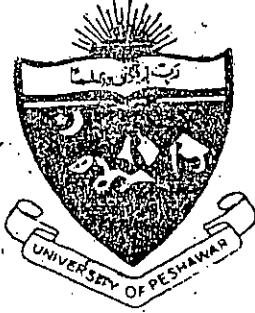
Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Physics	75	48	Forty Eight
A Course of Mathematics	75	55	Fifty Five
B Course of Mathematics	75	50	Fifty Only
Pak Studies	40	25	Twenty Five
Part-I	285	180	One Hundred and Eighty Only
Part-II	550	358	Three Hundred Fifty Eight

AMINA KHAN
Lecturer in Urdu BPS-17
GDC Dera Zinda
Pir Piai, Nowshera

Errors & omissions are subject to subsequent rectification.
The Examination was taken As a Whole.
Examination held from 22-Jan-2007 to 24-Feb-2008
Result Declared on Monday, April 20, 2008
Issue Date: 22-Apr-2008

Chances Available: 1
Principal
G.G.H.S.S. Ghallan
District Mohmand

(Dr. Mohammad Shafi)
ADDITIONAL CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR



University of Peshawar
Pakistan
Detailed Marks Certificate

16

Master of Arts in Islamiyat
Final
Annual Examination 2014
District Nowshera



Private

Name: ROBIA SHAMS

Gender: *Female* Roll No: 28066

Father's Name: SHAM SUR REHMAN

Registration No: 2006-GGCPN-281

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	47	Forty Seven
Principles of Islamic Jurisprudence-VII	100	60	Sixty Only
Islam & Other World Religions-VIII	100	60	Sixty Only
Islam & Contemporary Muslim World-IX	100	48	Forty Eight
Islam, Modren Thought & Islamic Law of Inheritance-X	100	76	Seventy Six
Viva Voce	100	65	Sixty Five
Previous 16095:Annual-2013	500	330	Three Hundred and Thirty
Final	1100	686	Six Hundred and Eighty Six

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 13-Aug-2014 to 13-Sep-2014

Result Declared on Wednesday, January 21, 2015

Issue Date: 22-Jan-2015

12:50 pm

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

University of Peshawar
Pakistan

This certifies that

Rubia Shams daughter of Shams Mr Rehman

having fulfilled all the requirements is hereby admitted to the degree of

Master of Arts in Islamiat

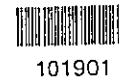
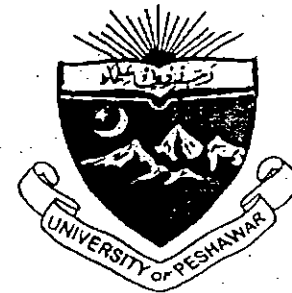
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 21st day of January 2015.

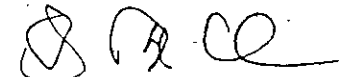
Roll No: 28066

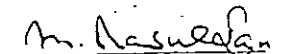
Session: Annual 2014

Registration No: 2006-GCEN-281



101901


Registrar


Vice Chancellor

19



OFFICE OF THE
CAL AGENT MOHMAND AGENCY
Domicile Certificate

Certified that Mr./Miss ROBIA SHAMS

Son/Daughter of SHAMS-UR-RAHMAN


Belongs to a recognized tribe of MOHMAND

section MUSA KHIL Sub section RAHMAT KOR

Residence / Village MATTAI DARA


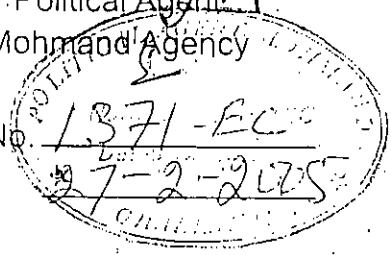
and his / her father is a permanent bonafide of the tribal area of Mohmand Agency.
He / She is an eligible candidate to avail himself / herself of the Seats reserved for
FATA Mohmand Agency.


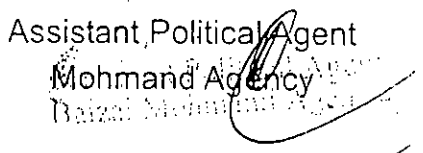
Category B 2

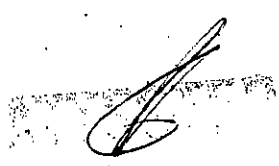

Political Agent Tehsildar

Countersigned

No. 1139 Dated 6.2.2005


Political Agent
Mohmand Agency

No. 1371-EC
27-2-2005


Assistant Political Agent
Mohmand Agency

No. 1730 Dated 12.2.05



بیان مکان قوم سید احمد رضا

بیان مکان قوم سید احمد رضا

معاذ ربوبہ شمس دفتر شمس النور ان فکریہ کے صدر کو ذرا سے
جنت میں کے صدر کو ذرا سے مولانا عبد اللہ درویش
کے پاس سے اس کے صدر کو ذرا سے ان کے مکان میں
شروع کیا۔ ان کے صدر کو ذرا سے ان کے مکان میں
الحمد للہ ربی سے ان کے صدر کو ذرا سے ان کے مکان میں
میں سے وہ ان کے صدر کو ذرا سے ان کے مکان میں
سے ان کے صدر کو ذرا سے ان کے مکان میں

6/2/2005

خانہ جلال
21406

Handwritten signature

Handwritten signature

21406-2661803-6 21406-4965200-1 21406-1194710-7

Handwritten signature

ANNEXURE C

21

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@iaepo.com



Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST Sc) in BPS-16 (Rs. 10000-300-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further Services placed at the disposal of Director of Education FATA for further posting against vacant SST Sc posts:-

SNO	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1	2	3	4	5	6	7
1	Sarwat Jehan	Gul Rahiman	Khyber Agy	1	Itmad Colony Dist & Tehsil Takht Mardan	Services placed at the disposal of Director of Education FATA for Further posting against vacant SST Sc posts
2	Robta Shams	Shams Ur Rahiman	Mohmand Agy	1	Village Matti Dara Musa, Khel Mohmand Agency	Services placed at the disposal of Director of Education FATA for Further posting against vacant SST Sc posts
3	Tahira Naz	Fazal-e-Dayan	Mohmand Agy	1	House No. 545 Sector 9 Street 5 Hayat Abad	Services placed at the disposal of Director of Education FATA for Further posting against vacant SST Sc posts

Terms and conditions:-

- Her services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory Provident fund in such a manner and at such rates as per prescribed by the Govt.
 - In case, she is already in Government service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.
 - Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.
4. She should join her post within 30 days of the issuance of this notification. In case of failure to join her post within one month of issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.

(Signature)

ATTESTED

22

BETTER COPY

5. She would be on probation for a period of one year extendable for another one year.
6. she will governed by such rules and regulations as may be issued from time to time by the Govt.
7. Her services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted at all concerned.
9. The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post of otherwise after one month of the issue of her posting orders.
10. The EDOs concerned will verify their documents before release of pay.
11. Her Seniority will be maintained as determined by the Khyber Pakhtunkhwa public service commission.
12. No TA/DA will be allowed to the appointee for joining her duty.

Muhammad Rafiq Khattak
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endost No. 4969....79/File No. 2/A -17/SST(F)/PSC/Apptt. dated Peshawar the 30/01/2012
Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Secretary Khyber Pakhtunkhwa Public service Commission Peshawar
3. Director of Education FATA Warsak Road, Peshawar
4. All Agency Accounts Officer in FATA.
5. Official Concerned.
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
8. M/File.

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

5. She would be on probation for a period of one year extendable for another one year.
6. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of her posting orders.
10. The EDOs concerned will verify their documents before release of pay.
11. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining her duty.

(Muhammad Rafiq Khattak)
 Director
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar.

444...76
 Endst: No. 1 File No. 2/A-17/SST(F)/PSC/Apptt. Dated Peshawar the 30/01/2012

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
 3. Director of Education FATA Warsak Road Peshawar.
 4. All Agency Accounts Officer in FATA.
 5. Official Concerned;
 6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
 7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 8. M/File

(Signature)
 Dy: Director (Estab)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar
 30/1/2012

ATTESTED

ANNEXURE D (23)

DIRECTORATE OF EDUCATION FATA

WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9710196 FAX 091-9710216

NO.

DATE

Consequent upon their appointment as Secondary School Teachers (Science) in BS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Directorate of Education FATA vide Director Elementary & Secondary Education, Khyber Pakhtunkhwa's Notification No. 4969-76/File No.2/A-17/SST(F)/PSC/Apptt. dated 30-01-2012, the following SSTs(Science) are hereby adjusted in the schools noted against each with immediate effect:-

S	Name, Father's Name/Domicile/Address	Posted at	Remarks
1	Ms. Sarwat Jehan D/O Gul Rahman (Khyber) Ibad Colony Tehsil Bhai Distt:Mardan	GGHS Sra Shah Mohmand Agency	Against newly created post
2	Ms. Robia Shams D/O Shams Ur Rehman (Mohmand) Village Matfi Dara Musa Khel, Mohmand Agency	GGHSS Ghallanai Mohmand Agency	Against vacant post
3	Ms. Tahira Naz D/O Fazal-e-Dayan (Mohmand) House No. 5-15 Sector 9 Street 5 Hayat Abad,	GGHS Subhan Khaywar, Mohmand Agency	-do-

Two

For copy of this order of adjustment, will be the same as already prescribed in the above

notification cited above. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

(FAZLI MANAN)
DIRECTOR FOR EDUCATION
FATA PESHAWAR

Order No. 2405-15 A-E/ Apptt. of SST Science(F)/(PSC) Dated Peshawar the 16/2/2012

Copy forwarded to the:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar w/r to his Notification cited above.
- 2 Agency Education Officer, Mohmand Agency at Ghallanai
- 3 Agency Accounts Officer, Mohmand Agency at Ghallanai
- 4 Principal/leadmistress concerned
- 5 Officials concerned

ADDL: DIRECTOR (ESTAB)

RECEIVED

ANNEX "E"

24

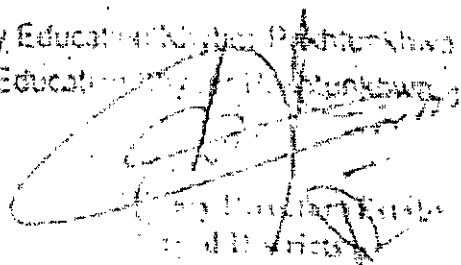
NOTIFICATION

1. WHERE AS one Mst Robi Shams D/O Shams Ur Rehman who herself appointed as SST (G) at GGHSS Ghallani District Mohmand vide Notification No. 4969-76/File No. 2/A-1/SST(F)/Gen/PSC/Appnt dated 30/01/2012 and No. 2408-15/A-1 (General) /Appnt. of SST (F) (PSC)2012 dated 16/02/2012 upon the production of fake/bogus appointment order not issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 778 dated 24-04-2021 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mst Robi Shams D/O Shams Ur Rehman, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1955 and in pursuance of the scrutiny of selection/appointment record in the above mentioned SST which was found fake/bogus, thus the appointment/adjustment Notification No. 4969-76/File No. 2/A-1/SST(F)/Gen/PSC/Appnt dated 16/02/2012 and No. 2408-15/A-1 (General) /Appnt. of SST (F) (PSC)2012 dated 16/02/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst Robi Shams D/O Shama Ur Rehman in the interest of Public Service

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Encl. No. 11252-57 dated 26/4/2021
Copy forwarded to file

1. Regs Khyber Pakhtunkhwa Service Tribunal Peshawar
2. District Education Officer Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned
3. District Account Officer Mohmand
4. Principals/Head Mistress concerned
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa



ATTACHED

To,

The Secretary (E&SE) Department,
Khyber Pakhtunkhwa, Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED NOTIFICATION DATED 26-07-2021
WHEREBY APPOINTMENT ORDER OF THE
APPELLANT HAS BEEN DISOWNED**

R.SHEWETH:

ON FACTS:

- 1- That initially the appellant was inducted/ appointed as Secondary School Teacher (BPS-16) on the proper recommendation of Khyber Pakhtunkhwa Public Service Commission vide Notification dated 30.1.2012. That in response the appellant got herself medically examined and also submitted arrival report. That where after the appellant started performing her duty at the concerned station quite efficiently and up to the entire satisfaction of her superiors.
- 2- That after proper verification of Educational antecedents and service documents the salary of the appellant has been released/started by the concerned authorities.
- 3- That it is pertinent to mention that appellant is equipped with the qualification of M.A and professional qualification of Bachelor of Education which is over and above the requisite qualification for the post of SST (BPS-16).
- 4- That it is pertinent to mention that during the said period the appellant has successfully completed her probationary period and as such the Department confirmed the appellant against the post of SST (BPS-16).
- 5- That so much so the appellant was also assigned seniority in the cadre of SST (BPS-16) and was due for promotion to the next higher scale but unfortunately the authority without any reason & rhyme and without following codal formalities straight away issued the impugned Notification dated 26-07-2021 whereby the appointment Notification of the appellant dated 30.01.2012 has been disowned by the authority.
- 6- That appellant feeling aggrieved filed the instant Departmental appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 26-07-2021 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

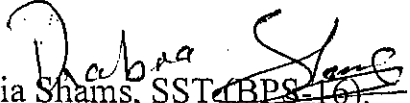
ATTACHED


- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned Notification dated 26-07-2021 has been issued by the concerned authority in violation of the Principle of locus Poenitentiae.
- D- That no charge sheet and statement of allegation has been issued by the concerned authority before issuing the impugned Notification dated 26-07-2021.
- E- That no show cause notice has been issued to appellant before issuing the impugned Notification dated 26-07-2021.
- F- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.
- G- That the concerned authority acted in arbitrary and malafide manner while issuing the impugned Notification dated 26-07-2021.
- H- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that on acceptance of this Departmental appeal the impugned Notification dated 26-07-2021 may kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

DATED: 07.08.2021

APPELLANT


Robia Shams, SST (BPS-16),
GGHSS Ghallani, District Mohmand.


ATTORNEY

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

8.B

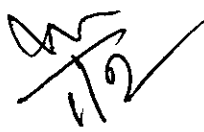
No.

Appeal No. of 20 ..

..... ⁷⁷⁷⁷ Appellant/Petitioner
Mst. Robia Ghams

..... Respondent
The Secy: ERSE Deptt. KPK

Notice to: —

the Secretary ERSE Deptt. KPK ¹ 

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20 .. ^{26th}

Jan 22

(For Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

7777

21

Appeal No. MST: Robia Shams of 20

Appellant/Petitioner

The Secy. ERSE Versus Deptt. KPK

Respondent

Respondent No. The Director ERSE Deptt. KPK

Notice to: —

Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

26th

Given under my hand and the seal of this Court, at Peshawar this.....

Jan 22

Day of.....20

(for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. S.B

No.

Appeal No..... 7777 of 20 21

Mst. Robia Chams Appellant/Petitioner

Versus

The Secy. F&SE Dept. HPK Respondent

Respondent No. 3

Notice to: — The Chairman Public Service Commission Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellat/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 24th

Day of..... Jan 20 22

(for Reply)

700
25-2-22

Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

SB

Appeal No. 7777 of 20 22
Robia Shams

Appellant/Petitioner

Secy ESSE Deptt: KPK Peshawar ^{Versus} KPK Peshawar
Respondent

Respondent No. (2)

Notice to:

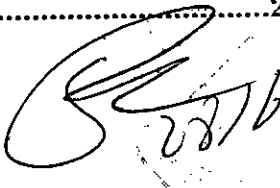
Director ESSE Deptt: KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 25/07/2022 at 8:00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing, 4 copies, of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition:

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 17th Day of June 2022

(For Reply) 

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

80

Appeal No. 7777 of 2022

Robia Shams Appellant/Petitioner

Secy EGSE Deptt: KPK Peshawar Respondent
 Versus
 Respondent No. (1)

Notice to: — Secy EGSE Deptt: KPK Peshawar
276

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 21/07/2022 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing, 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 17th

Day of June 20 22

(For Reply)

[Signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 7777 of 20 22 ^{SB}

Robia Sham Appellant/Petitioner
Versus

Secy ESSE Deptt: KPK Peshawar Respondent
Respondent No. (3)

Notice to: — Chairman KPK Public Service Commission
Fort Road Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....17/6
Day of.....June.....20 22

(For Reply)

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

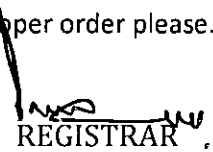
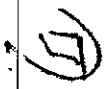

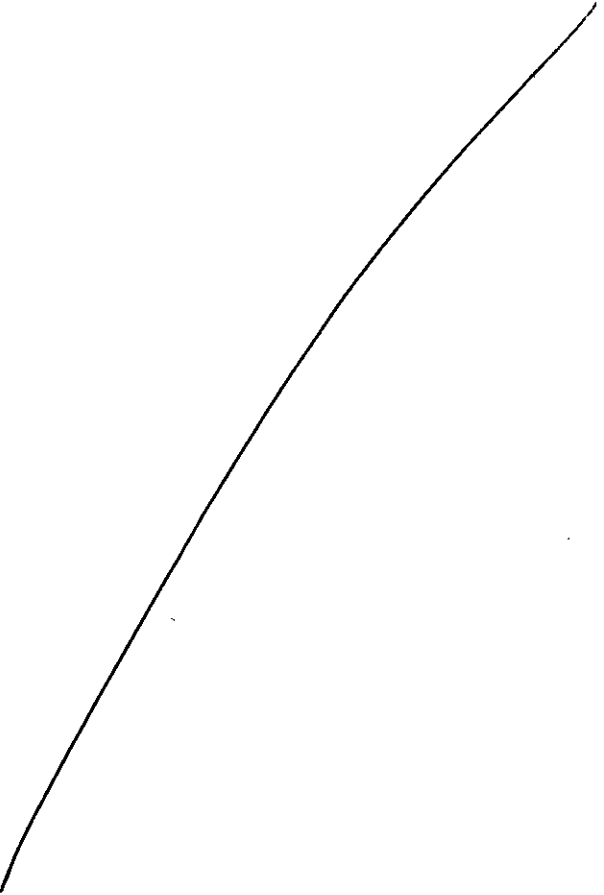
Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 7777/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/11/2021	<p>The appeal of Mst. Robia Shams presented today by Mr. Noor Mohammad Khattak 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</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on 10-01-2022.</p> <p style="text-align: right;"> CHAIRMAN</p> 

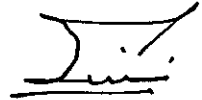
10.01.2022

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Preliminary arguments heard.

Points raised need consideration, therefore, the appeal in hand is admitted to regular hearing subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 15.03.2022 before the S.B.

Appellant Deposited
Security & Process Fee

14/1/22



(Salah-Ud-Din)
Member (J)

15.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 06.6.2022. for the same as before.



Reader.

06.06.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General present. None present on behalf respondent Department.

Reply on behalf of respondents is still awaited. Notice be issued to respondents for submission for comments. To come up for reply/comments on 21.07.2022 before SB.



(Rozina Rehman)
Member (J)