16.05.2022 Learned counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant while opening her arguments at the stage of preliminary hearing contended that the appellant is aggrieved of the notification dated 17.03.2021 when her earlier notification of promotion dated 07.12.2020 was withdrawn. Her departmental appeal dated 31.03.2021 was not decided within the statutory period hence the instant service appeal was filed in the Service Tribunal on 27.12.2021. It was further argued that on her promotion from the post of CT (BS-15) to senior CT (BS-16) she actualized her promotion when took over the charge and submitted charge report on 08.12.2020 and as such her rights on alleviated position did accrue from that vary date. When her attention was drawn towards the period of limitation for about 6 months, she contested and contended that no limitation run against the cases involving promotion and financial implications as a recurring cause.

Rs 600

Appellant Deposited Security & Process Fee 20/5

Points raised need consideration. The appeal 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. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 21.07.2022.

(Mian Muhammad)
Member(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7941 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/12/2021	The appeal of Mst. Mehr-Un-Nisa resubmitted today by Roeeda Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR
2-		This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on 18/02/22. CHAIRMAN
	18.02.2022	Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 16.05.2022 for the same as before. Reader

BEFORE KHYBER PKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: MST-Mehtab-Un-Nisa vs Educate

S.#	Contents	Yes	No
1.	This appeal has been presented by:		
2.	Whether Counsel / Appellant / Respondent / Deponent 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?	✓	
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 A.G/D.A.G?		
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 cuttings/overwriting?	✓	
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: Roeeda khan

Signature: [signature]

Dated: 27-12-21

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. 7941 /2021

Mst. Mehr-Un-Nisa

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary

Elementary & Secondary Education Peshawar & Others

INDEX

S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-5
2.	Affidavit.		6
3.	Addresses of parties		7
4.	Application for Condonation of delay	-	8-9
5.	Copy of appointment order	"A"	10
6.	Copy of promotion order dated 07.12.2021 and charge report	"B & C"	11-13
7.	Copy of impugned order	"D"	14-15
8.	Copy of departmental appeal	"E"	16-17
9.	Copy of a seniority list	"F"	18-19
10.	Wakalatnama		

APPELLANT

Through

Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 27/12/2021

(1)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. _____/2021

Mst. Mehr-Un-Nisa W/o Muqaddar Khan R/o House No.2 Defence Society District Mardan.

Appellant

VERSUS

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. District Education Officer (FR) Peshawar.
3. Director Elementary & Secondary Education KPK Peshawar.
4. District Education Officer Sub Division Hassan Khan District Peshawar.
5. Mst. Samina Yasmin (SCT BPS-16) D/o Ghulam Muhammad presently posted at GGMS Javed Iqbal Kaley Hassan Khel Peshawar.

Respondents

APPEAL U/S-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 17-03-2021, WHEREBY THE PROMOTION ORDER DATED 07.12.2020 OF THE APPELLANT AS SCT BPS-16 HAS BEEN WITHDRAWN AGAINST WHICH THE APPELLANT FILED A DEPARTMENTAL APPEAL ON 31.03.2021 WHICH HAS NOT BEEN DECIDED WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL THE IMPUGNED PROMOTION ORDER DATED 17.03.2021 MAY KINDLY BE SET-ASIDE AND THE PROMOTION ORDER DATED 07.12.2020 OF THE APPELLANT MAY KINDLY BE RESTORE IN FAVOR OF THE APPELLANT ALONG WITH ALL BACK BENEFITS.

ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT THAT MAY ALSO BE ONWARD GRANTED IN FAVOUR APPELLANT.

Respectfully Sheweth.

1. That the Appellant has been initially appointed as Certified(CT) Teacher BPS-9 on 21.03.2013 with respondent department. **(Copy of appointment order is attached as annexure "A").**

2. That after appointment the appellant performed his duty regularly and with full devotion and no complaint whatsoever has been made against the appellant.

3. That the appellant has been promoted as SCT BPS-16 on 07.12.2020 and properly

took over charge of the said post on 08.12.2020 by the respondent department. **(Copy of promotion order dated 07.12.2020 and charge report is attached as annexure "B" & "C").**

4. That astonishingly after the lapse of three months of promotion, the promotion order of the appellant has been withdrawn vide notification dated 17.03.2021 with immediate effect. **(Copy of impugned order is attached as annexure "D").**

5. That the appellant submitted departmental on 31.03.2021 agaisnt the impugned order dated 17.03.2021 which has not been decided within the statutory period of 90 days. **(Copy of departmental appeal is attached as annexure "E").**

6. That the respondent No.5 has not been promoted to BPS-16 on dated 07.12.2020 through departmental promotion committee as proper channel, and who has been promoted directly without proper channel to BPS-16. That the promotion order of Respondent No.5 e.i BPS-16 is maintained by the concerned department on 17.03.2021. It is pertinent to mentioned here that

respondent No.5 was junior from appellant in the seniority list. **(Copy of seniority list is attached as annexure "F").**

7. That one of the colleague of the appellant has also been filed service appeal No. 7119/21 in this Hon'ble Court which has been admitted and fixed for 08.03.2021.

8. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUNDS:-

A. That the impugned order 17/03/2021 is illegal, void and ab-initio order because it has been passed against the law and rules.

B. That the impugned order is also illegal because private respondent No. 6 to 9 has been promoted to BPS-20 who is junior to the appellant.

C. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of the instant service appeal the impugned promotion order dated 17.03.2021 may kindly be set-aside and the promotion order dated 07.12.2020 of the appellant may kindly be restore in favor of the appellant along with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

APPELLANT

Through

Roeed Khan
&
Sheeba Khan
Advocates, High Court
Peshawar.

Dated: 27/12/2021

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.

Advocate.

(6)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. _____/2021

Mst. Mehr-Un-Nisa

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & Others

AFFIDAVIT

I, Mst. Mehr-Un-Nisa W/o Muqaddar Khan R/o House No.2 Defence Society District Mardan, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

DEPONENT

IDENTIFIED BY:

Roeeda Khan
Advocate High Court
Peshawar.

(7)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. _____/2021

Mst. Mehr-Un-Nisa

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & Others

ADDRESSES OF PARTIES

PETITIONER.

Mst. Mehr-Un-Nisa W/o Muqaddar Khan R/o House No.2 Defence Society District Mardan.

ADDRESSES OF RESPONDENTS

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. District Education Officer (FR) Peshawar.
3. Director Elementary & Secondary Education KPK Peshawar.
4. District Education Officer Sub Division Hassan Khan District Peshawar.
5. Mst. Samina Yasmin (SCT BPS-16) D/o Ghulam Muhammad presently posted at GGMS Javed Iqbal Kaley Hassan Khel Peshawar.

APPELLANT

Through

Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 27/12/2021

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. _____/2021

Mst. Mehr-Un-Nisa

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & Others

APPLICATION FOR CONDONATION OF DELAY (IF ANY)

Respectfully Sheweth,

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.

GROUNDS:

A. That the impugned order is void and illegal and no limitation run against the void orders because the impugned order has been passed without fulfilling the codal formalities.

B. That there are number of precedents of the Supreme Court of Pakistan which

provides that the cases shall be decided on merits rather than technicalities.

C. That there are many judgment of the superior court as well as specific provision in service law that in case of promotion, seniority financial matter no limitation has been run against that.

D. That the impugned order is also void because it has been passed from the retrospective effect as well as passed by incompetent authority.

It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.

APPELLANT

Through

Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 27/12/2021

OFFICE OF THE
AGENCY EDUCATION OFFICER
FR PESHAWAR
BLOCK: 8 NEAR INFORMATION DEPTT:
KHYBER ROAD, PESHAWAR, K.P.K
Phone No. 091-9210145

No. 6135-40 Dated 21/1/2013

APPOINTMENT.

Consequent upon the interview by the Selection Committee, the following Female Candidates FR Peshawar Domicile holders are hereby appointed as C.T teachers in BPS-9 (Rs.6200-380-17600) PM plus usual Allowances on contract regular Non-Pensionable basis with effect from the date of their taking over charge in the following schools in the interest of public service on the following terms and conditions:-

S.No.	Name.	Father Name	Posted at	Domicle	Remarks.
1	Ms.Kaneez Kalsoom	Rehman Gul	GGMS Muzafar Keley	Ali Khel	Against Vacant post
2	Ms.Samina Yasmin	Ghulam Muhammad	GGMS Javed Iqbal Kelley	Jana Kor	Against Vacant post
3	Ms.Bushra Begum	Khadi Sher	GGMS Niaz Mir Keley	Asho Khel	Against Vacant post
4	Ms.Saadia	Hawa Khan	GGMS Sadey Khan.	Asho Khel	Against Vacant post
5	Ms.Sumera Raza	Raza Gul	GGMS Javed Iqbal	Zaka Khel	Against Vacant post
6	Ms.Farzana	Ghulam Muhammad	GGMS Hasham Khan Kelley	Jana Kor	Against Vacant post
7	Ms.Samreen	Sardar Afzal	GGMS Zarman shah	Hassan Khel	Against Vacant post
8	Ms.Yasmin Begum	Khair Muhammad	GGMS Hasham Khan kelley	Jana Kor	Against Vacant post
9	Ms.Mehrun Nisa	Syed Habib Khan	GGMS Muzafar Keley	Hassan Khel	Against Vacant post

TERMS AND CONDITIONS.

1) Charge report should be submitted to all concerned.
2) The appointment of the candidates being purely on temporary basis and is liable to termination at any time without any notice.
3) If a candidate wishes to resign his post he will give one Month prior notice or his pay for one month will be forfeited in lieu thereof.
4) They should produce their original Certificates/documents for verification/entry in S/Book.
5) They should produce their health and age Certificate from the Medical Superintendent Concerned.
6) They may not be handed over charge if their age is below 18 years or above 35 years age.
7) If they fails to report within 15 days then will be treated as cancelled automatically.
8) If any technical legal flaw is pointed out the appointment will stand as cancelled.
9) The appointees will not be entitled to pension/commutation and G.P Fund emoluments.

SYED HUSSAIN AFRIDI
AGENCY EDUCATION OFFICER
FR PESHAWAR.

Copy for information and necessary action to the:-

1) Additional Accountant General (PR) Sub Office Peshawar.
2) Director Education FATA Peshawar.
3) Principals/Headmasters of schools concerned.
4) AAEO (M) FR Peshawar.
5) Candidates Concerned.
6) Accountant Local Office.

AGENCY EDUCATION OFFICER
FR PESHAWR.

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs/DMs/Ats/& TTs (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior AT/ &Senior TT (BPS-16) (**Rs. 18910-1520-64510**)) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the vacant the post of Senior CT/Senior DM/Senior AT/Senior TT & Senior PET (BPS-16) posts.

1.CT to SCT(BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular CT	Remarks
1	11	Hamida Bibi	GGHS Khan Zada	18/11/1978	1/9/2009	Services placed at the disposal of DEO Sub Division Hassan Khel for further posting
2	12	Nabila Gul	GGMS Hashim Khan	6/1/1985	1/9/2009	-do-
3	13	Hamida Begum	GGMS Mir Haider	3/10/1983	10/2/2010	-do-
4	14	Mehrunnisa	GGMS Qarar Khan Killi	1/6/1975	21/1/2013	-do-
5	15	Yasmeen Begum	GGMS Rehman Shah	3/12/1969	21/1/2013	-do-

2. DM to SDM(BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular DM	Remarks
1	4	Nazia Begum	GGMS Qarar Khan	1/4/1977	1/9/2005	Services placed at the disposal of DEO Sub Division Hassan Khel for further posting
2	6	Yasmeen Gul	GGMS Numan Killi	12/9/1982	31/12/2010	-do-

Terms and conditions:-.

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.

7 *They will give an under taking to be recorded in their service books to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.*

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 6592-99 / File No.1/Promotion Senior Teachers (PSB-16)2016
Dated Peshawar the 07/12 2020.

Copy forwarded for information and necessary action to the: -

1. *Accountant General Khyber Pakhtunkhwa Peshawar.*
2. *District Education Officer Sub Division Hassan Khel District Peshawar.*
3. *District Accounts Officer concerned.*
4. *Officials Concerned.*
5. *PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.*
6. *PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.*
7. *M/File*
8.

Deputy Director (Female)
Merged Districts

"C" (13)

CHARGE REPORT.

Certified that I Mst. Mehrunnisa have this day 08.12.2020 forenoon taken over the charge of the Sr.CT vacant post at GGMS Qarar Khan Killi HSD Peshawar vide Director E&SE Khyber Pakhtunkhwa Peshawar Endst: No.6293-99 dated: 07.12.2020.

Signature of the relieved:
Govt. Servant: Vacant
Designation: SR.CT

Station: :DEO Hassan Khel Sub Division Peshawar.
Dated: 8/12/20

Signature of the relieving:
Govt. Servant: **Mehrunnisa**
Designation: **SR.CT**

District Education Officer
HSD Peshawar

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female CTs/DMs/Ats/& TTs (BPS-15) are hereby promoted to the post of Senior CT/Senior DM/Senior AT/ &Senior TT (BPS-16) (Rs. 18910-1520-64510)) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against vacant post of Senior CT/Senior DM/Senior AT/Senior TT & Senior PET (BPS-16) posts.

1.CT to SCT(BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular CT	Remarks
1	10	Samina Yasmeen	GGMS Numan Killi	30/3/1980	28/1/2013	Services placed at the disposal of DEO Sub Division Hassan Khel for further posting
2	14	Mehrunnisa	ASDEO Sub Division Hassan Khel	1/6/1975	21/1/2013	Her promotion order issued Vide Endst.No.6293-99 dated 7/12/2020 is hereby withdrawn with immediate effect being Junior at S.No.1.
3	15	Yasmeen Begum	GGMS Rehman Shah	3/12/1969	21/1/2013	Her promotion order issued Vide Endst.No.6293-99 dated 7/12/2020 is hereby withdrawn with immediate effect being Junior and further her services may placed at the disposal of D.E.O Hassan Khel for further posting/adjustment againct vacant CT post.

2. DM to SDM(BPS-16)

S. No.	S.L. No.	Name of Official	Present Place of Posting	Date of Birth	Date of Apptt; as Regular DM	Remarks
1	6	Yasmeen Gul	GGMS Numan Killi	12/9/1982	31/12/2010	Considered suitable for promotion to the post of Senior DM (BPS-16) on regular basis with immediate effect instead of 7/12/2020.

Terms and conditions:-.

1 They would be on probation for a period of one year extendable for another one year.
2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4 Charge report should be submitted to all concerned.
5 Their Inter-Se- seniority on lower post will remain intact.
6 No TA/DA is allowed for joining his duty.
7 They will give an under taking to be recorded in their service books to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. 3683-90 / File No.1/Promotion Senior Teachers (PSB-16)2021 Dated Peshawar the 17/03/ 2021.

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Additional Director(Estab) Merged Districts Local Directorate
3. District Education Officer Sub Division Hassan Khel District Peshawar.
4. Assistant Accounts Officer Peshawar
5. Officials 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

12/3/2021

Deputy Director (Female)
Merged Districts

(16)

To,

1. The Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director Elementary Education Khyber Pakhtunkhwa Peshawar.

Subject: **DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 17.03.2021 WHEREBY THE PROMOTION ORDER DATED 07.12.2020 OF THE APPELLANT HAS BEEN WITHDRAWN WITH IN REASON AND WITHOUT FULFILLING THE CODAL FORMALITIES.**

Respected Sir,

The appellant submits as under.

1. That the Appellant has been appointed as C.T (Certified Teacher BPS-15) on 21.01.2013.

2. That after appointment the appellant performed her duty with hard work and full devotion and no complaint whatsoever has been made against the appellant.

3. That on 07.12.2020 the appellant has been promoted to SCT (Senior Certified Teacher BPS-16) (Copy of order is attached).

4. That the appellant properly submitted her charge report as SCT (BPS-16) on 08.12.2020 (Copy of charge report is attached).

5. That on 17.03.2021 the promotion order dated 07.12.2020 of the appellant has been withdrawn without any reason by the respondent department.

It is therefore, humbly prayed that on acceptance of this departmental appeal the appellant may kindly be restore on his original post as SCT BPS-16 alog with all back benefits.

Appellant

Mst. Mehrunisa

Dated: 31/03/2021

(18) "F"

OFFICE OF THE DISTRICT EDUCATION OFFICER HASSAN KHEL SUB DIVISION PESHAWAR

GENERAL SENIORITY LIST OF CT FEMALE FOR THE PROMOTION TO SST

TOTAL NOS OF Sanctioned CT, SCT POST DULY VERIFIED FROM AGPR PESHAWAR. - 33

No. of SCT Posts: 11

GENERAL SENIORITY LIST IN R/O CT Female TEACHERS IN HSD PESHAWAR

S/#	Name of Official	F/Name	BPS	Acad: Qualif:	Prof:	Date of Birth per SSC Certificate	Date of App: as CT.	Date of declaration as regular CT	Present School of Posting	combination of subject	Remarks
1	Robina Shaheen	Naseer Ahmad	16	BA	CT	06-01-65	25-10-87	25-10-87	GGMS Javid Iqbal		Havn,t prescribed qualification
2	Safia Begum	Muhammad Siddiq	16	MA,	B.ed	22-08-74	01-09-99	01-09-99	GGHS Khan Zada	General	
3	Shazma Ishaq	Muhammad Ishaq	16	MA,	B.ed	15-03-65	04-03-92	30-09-99	GGHSS Samand Khan	General	
4	Zakia Shaheen	Muhd Saddique	16	BA	B.ed	12-05-76	01-01-01	01-01-01	GGMS Javid Iqbal	General	
5	Yasmeen Khan	Afzal Khan	16	BA,	B.ed	03-12-70	01-09-95	06-08-02	GGHSS Samand Khan	General	
6	Fozia Yasmeen	Abdus Samand	16	MA,	B.ed	02-11-72	01-09-03	01-09-03	GGHSS Samand Khan	General	
7	Husna Sadullah	Sadullah Khan	16	BA,	B.ed	02-02-76	01-09-03	01-09-03	GGHS Khanzada	General	
8	Shahnaz Gul	Yousaf Khan	16	BA,	B.ed	31-12-72	01-12-04	01-12-04	GGHS Waris Khan	General	
9	Humaira Mufti	Wazir Ahmad Jan	16	MA	B.ed	29-06-65	01-09-05	03-12-05	GGHS Waras Khan	General	
10	Azra Bano	Muhammad Zahir	16	BA	B.ed	01-04-78	01-09-06	01-09-06	GGHS Muhamamd Gul	General	
11	Hamida Bibi	Khadi Sher	15	MA	B.ed	18-11-78	01-09-99	01-09-09	GGHS Khan Zada	General	
12	Nabila Gul	Fazal Akbar	15	BA	B.ed	06-01-85	01-09-09	01-09-09	GGMS Hashim	General	
13	Hamida Begum	Kala Khan	15	MA	B.ed	03-10-83	01-10-09	10-02-10	GGMS Mir Haider	General	
14	Mehrunisa	Syed Habib	15	MA	B.ed	01-06-75	21.01.2013	21.01.2013	DEO Office HSD pesh	General	
15	Yasmeen Begum	Khair Muhammad	15	BA	B.ed	03-12-69	04-09-94	21-01-13	GGMS Rehamn Shah	General	
16	Farzana Ghulam	Ghulam Muhammad	15	MA	B.ed	01-12-82	21-01-13	21-01-13	GGMS Muhammad Gul	General	
17	Bushra Begum	Khadi Sher	15	BA	B.ed	16-10-87	01-09-09	21-01-13	GGHS Khan Zada	General	
18	Saadia	Hawa Khan	15	BA	B.ed	13-04-92	21-01-13	21-01-13	GGMS Mir Haider	General	
19	Sumaira Raza	Raza Gul	15	MA	B.ed	11-04-86	22-01-13	22-01-13	GGMS Numan	General	
20	Samreen	Sardar Afzal	15	BA	B.ed	04-07-89	24-01-13	24-01-13	GGMS Zarman Shah	General	
21	Samina yasmeen	Ghulam Muhammad	15	MA	B.ed	30-03-80	28-01-13	28-01-13	GGMS Numan Killi	General	

S/#	Name of Official	F/Name	BPS	Acad. Qualif.	Prof.	Date of Birth per SSC Certificate	Date of App. as CT	Date of declaration as regular CT	Present School of Posting	combination of subject	Remarks
22	Ruqia	Shoukat Ali	15	MA	B.ed	01-01-86	25-10-17	25-10-17	GGMS Muzaffar	General	
23	Safina				B.ed	12-05-87	25-10-17	25-10-17	GGMS Qarar Khan	General	
24	Sadaf Sardar	Gul Zarin	15	MA	B.ed	01-03-88	25-10-17	25-10-17	GGMS Noor Daman	General	
25	Amena Mumtaz	Mumtaz khan	15	MA	B.ed	01-08-89	25-10-17	25-10-17	GGMS Hasham	General	
26	Roshna	Muhd Idress	15	MA	B.ed	05-10-90	25-10-17	25-10-17	GGHS Muhd Gul	General	
27	Vacant								GGMS Barki No 2		
28	Vacant								GGMSLatif Khan		
29	Vacant								GGMS Latif Khan		
30	Vacant								GGMS M.Nawaz		
31	Vacant								GGMS M.Nawaz		
32	Vacant								GGMS Sadi Khan		
33	Vacant								GGMS Sadi Khan		

District Education officer
Hassan khel Sub Division
Peshawar

قیمت 50 روپے

81517

ایڈوکیٹ: _____

بار کونسل/ایسوسی ایشن نمبر: _____

رابطہ نمبر: 03330265900

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: جج سروس ٹرامونل پشاور

منجانب:

دعویٰ: _____

علت نمبر: _____

مورخہ _____

جرم: _____

تھانہ _____

میر النساء

بنام

ایجوکیشن

باعث تحریر آنکہ

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

آن مقام پشاور کیلئے روئیدہ خان اور شیبا خان کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہٰذا وکالت نامہ لکھ دیا تا کہ سند رہے

المرقوم: 27-12-2021

گواہ شد

العبد العبد

مقام پشاور کے لیے منظور ہے۔

Accepted by
Adv. Roeeda Khan
&
Adv. Sheeba Khan

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

GS&PD-444/1-RST-12,000 Forms-22.09.21/PHC Jobs/Form A&B Ser. Tribunal/P2

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

S.B

No.

Appeal No. 7941 *of 20* 21

MST: Mehr-un-Nisa *Appellant/Petitioner*

Versus

Regd

Govt: of KPK Secy: E&SE *Respondent*

Respondent No. 5

Notice to:: — MST: Samina Yasmin (SCT BPS-16) D/O Ghulam Muhammad presently posted at GC-

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 24/7/22 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 7th

Day of June 20 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.

S.B

No.

Appeal No. 7941 *of 20* 21

Mst: Mehr-un-Nisa ..... *Appellant/Petitioner*

Versus

Govt: of KPK Secy: E&SE ..... *Respondent*

Respondent No. 4

Reply

Notice to: — Distt: Education Officer Sub Division Hassan Khel Distt: 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.

24/7/22

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 1th

Day of June **20** 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 Sundays 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. 7941 *of 20* 21

MST: Mehr-un-Nisa *Appellant/Petitioner*

Versus

Govt. of KPK Secy: E&SE *Respondent* 2

Respondent No.

Notice to: — Distt. Education Officer (FR) 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 21/7/22 **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 1st

Day of June **20** 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.

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"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. 7941 of 20 21

MST: Mehr-Un Nisa
Appellant/Petitioner

Versus

Govt of Kyb Secy: E & SE
Respondent

Respondent No. 2

Notice to: Distt. Education Office (FR) 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 21/7/22 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 1st

Day of June 20 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 Friday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

GS&PD-444/1-RST-12,000 Forms-22.09.21/PHC Jobs/Form A&B Ser. Tribunal/P2

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

S.B

No.

Appeal No. 7941 *of 20* 21

M.St. Mehr-Un Nisa *Appellant/Petitioner*

Versus

Govt. of KPK through Secy. E&SE *Respondent*

SECRETARY DIARY

Respondent No. 1 / / 3/6

Notice to: — Govt. of KPK through Secretary E&SE 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 21/7/22 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 1th

Day of June 20 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.

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"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

S.B

No.

Appeal No. 7941 *of 20* 21

Mst. Mehr-Un-Nisa *Appellant/Petitioner*

Versus

Govt. of KPK Secy. ERSE *Respondent*

Respondent No. 3

Notice to: — Director ERSE 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.....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 1th

Day of..... June **20** 22

for Reply 6/7/22

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.

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"B"

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

No.

Appeal No. 7941 of 20 21

Appellant Petitioner

Versus

Govt of Kyb Govt ERSE Respondent

Respondent No. 3

Notice to: — Director ERSE Kyb 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 1/ 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 1/ Day of June 20 22

For Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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