


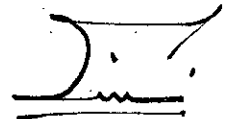
ORDER
19.04.2022

Nemo for the appellant. Ms. Rehana Yasmeen, DEO (Female) Kohistan alongwith Mr. Kabirullah Khattak, Additional Advocate General for the present.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time despite notice for prosecution of the appeal being issued to the appellant as well as her counsel through registered post. The appeal in hand is, therefore, dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
19.04.2022


(Rozina Rehman)
Member (J)
Camp Court Abbottabad


(Salah-ud-Din)
Member (J)
Camp Court Abbottabad

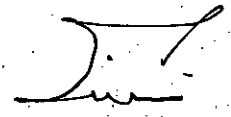
17.01.2022

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Notice for prosecution of the appeal be issued to the appellant as well as her counsel through registered post and to come up for arguments on 19.04.2022 before the D.B at Camp Court Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court A/Abad




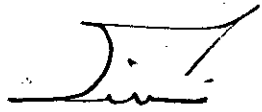
(Salah-ud-Din)
Member (J)
Camp Court A/Abad

22.09.2021

Mr. Hamayun Khan, Advocate, for the appellant present.
Mr. Riaz Ahmed Paindkhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 17.11.2021 at Camp Court Abbottabad.

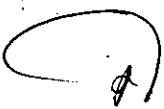

(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT ABBOTTABAD



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

17.11.2021

Counsel for the appellant and Mr. Muhammad Rasheed, DDA for the respondents present.

Learned counsel for the appellant seeks adjournment in order to further prepare the brief. Request is accorded. To come up for arguments on 17.01.2022 before the D.B.


(Rozina Rehman)
Member(J)
Camp Court, A/Abad


Chairman
Camp Court, A/Abad

19.01.2021

Due to COVID-19, the case is adjourned for the same on 17.02.2021 before D.B.

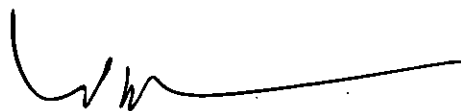

READER

17.02.2021

Appellant present through counsel

Noor Zaman Khattak, learned District Attorney alongwith Asar Jan ADEO for respondents present.

Former made a request for adjournment. Adjourned. To come up for arguments on 21.04.2021 before D.B at Camp Court, Abbottabad.



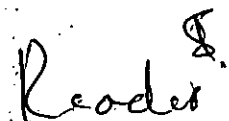
(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad



(Rozina Rehman)
Member (J)
Camp Court, Abbottabad

21-4-21

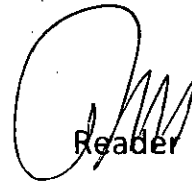
Due to covid 19, the case is adjourned to 22-9-21 for the same.


Reader

Due to covid ,19 case to come up for the same on 16 / 04 / 20
at camp court abbottabad.


Reader

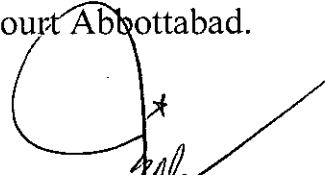
Due to summer vacation case to come up for the same on 11 / 2020 at camp court abbottabad. 116



Reader

16.11.2020

Assistant to counsel for the appellants is present. Mr. Usman Ghani, District Attorney for respondents are present.

The Lawyers community is not appearing in the Tribunal for the reason that they are observing sough of the Hon'able Chief Justice, Peshawar High Court, Peshawar, therefore, the case is adjourned to 19.01.2021 for arguments before D.B at camp court Abbottabad.


(Mian Muhammad)
Member(E)


(Muhammad Jamal Khan)
Member(J)
Camp Court Abbottabad

23.10.2019


Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant stated that he has not contacted with his client i.e the appellant and seeks adjournment. Appellant be put on notice for appearance. Adjourn. To come up for further proceedings/arguments on 18.12.2019 before D.B at Camp Court, Abbottabad.



Member


Member
Camp Court Abbottabad

18.12.2019


Counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 17.02.2020 for further proceedings/arguments before D.B at Camp Court Abbottabad.


(Hussain Shah)
Member
Camp Court Abbottabad


(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

19.06.2019


Counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Mr. Muhammad Saddique, ADO for respondent present. Written reply on behalf of respondent submitted which is placed on file. A copy of the same was also handed over to the learned counsel for the appellant. Case to come up for rejoinder and arguments on 20.08.2019 before D.B at camp court Abbottabad.


(Ahmad Hassan)
Member
Camp Court A/Abad

20.08.2019

Counsel for the appellant present. Mr. Muhammad Bilal learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourn. Case to come up for arguments on 23.10.2019 before D.B at camp court Abbottabad.

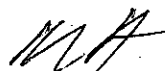

Member


Member
Camp Court A/Abad

20.02.2019


Counsel for the appellant Bas Pari present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was imposed major penalty of removal from service vide order dated 23.12.2017 by the competent authority on the allegation of absence from duty. It was further contended that the appellant filed departmental appeal on 24.07.2018 which was not responded hence, the present service appeal on 14.11.2018. Learned counsel for the appellant further contended that the appellant never remained absent from duty but the respondent-department has shown her absent illegally. It was further contended that neither proper inquiry was conducted nor absence notice was issued at the home address of the appellant therefore, the impugned order is illegally and liable to be set-aside.

The contentions raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 16.04.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

16.04.2019

Counsel for the appellant present. Mr. Muhammad Bilal, DDA alongwith Mr. Muhammad Saddique, ADO for respondents present. Written reply/comments not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 19.06.2019 before SB at camp court Abbottabad.

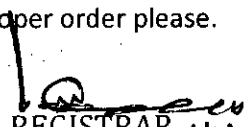
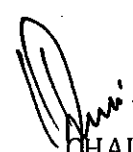

(Ahmad Hassan)
Member
Camp Court A/Abad

Appellant Deposited
Security & Process Fee

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1398/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/11/2018	<p style="text-align: center;">The appeal of Mst. Bass Pari presented today by Mr. Hamayun Khan 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 14/11/18</p>
2-	19/11/18	<p style="text-align: center;">This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20-02-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

9

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1398 /2018

Mst. Bas Pari wife of Shabbir, daughter of Khani Zaman, resident of Kaley Medan P.O Jejal Tehsil Palas Kohistan (EX PTC/ PST Teacher).

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Des~cription	Page No.	Annexure
1.	Memo of Appeal	1 to 6	
2.	Copy of appointment order	9	"A"
3.	Copy of attendance register	10-17	"B"
4.	Copy of writ petition	18-30	"C"
5.	Copy of impugned order	31	"D"
6.	Copy of departmental appeal	32-33	"E"
7.	Wakalatnama		

Bas Pari
...APPELLANT

Dated: 12/11 /2018

Through

H. Khan
(HAMAYUN KHAN)

Advocate High Court, Abbottabad

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1398 /2018

Mst. Bas Pari wife of Shabbir, daughter of Khani Zaman, resident of Kaley Medan P.O Jejal Tehsil Palas Kohistan (EX PTC/ PST Teacher).

...**APPELLANT**
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1632

Dated 14-11-2018

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Peshawar.
3. District Education Officer (Female) District Kohistan.

...**RESPONDENT**

Filed to-day

Registrar

14/11/18

SERVICE APPEAL UNDER SECTION 4 KPK
SERVICE TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED ORDER NO. 4328-34/DEO(F) KH,
DATED 23/12/2017 PASSED BY RESPONDENT NO.
3 WHEREBY RESPONDENT NO. 3 IMPOSED
MAJOR PENALTY REMOVED FROM SERVICE
WITH EFFECT FROM 25/05/2016 WHICH IS

ILLEGAL UNLAWFUL WITH OUT JURISDICTION
AGAINST THE PRINCIPAL OF NATURAL JUSTICE
AND LIABLE TO BE SET-ASIDE.

PRAYER:- ON ACCEPTANCE OF THIS SERVICE
APPEAL IMPUGNED ORDER DATED 23/12/2017
MAY KINDLY BE DECLARED NULL AND VOID
AND APPELLANT BE RE-INSTATED IN SERVICE
ALONGWITH ALL BACK BENEFITS, ANY OTHER
RELIEF WHICH THIS HONOURABLE TRIBUNAL
DEEMED FIT PROPER IN THE INTEREST OF
JUSTICE.

Respectfully Sheweth;-

May it please your lordship appellant bet to solicit on the
following factual and legal grounds;-

1. That the appellant belong from the most backward
and hilly district Kohistan.

2. That appellant initially was appointed as PTC/ PST teacher in year 2005 in BPS-4. Copy of appointment order is annexed as Annexure "A".
3. That consequent upon the appointment order appellant submitted her arrival report at GGPS Mahreen and joint duty.
4. That thereafter appellant transferred from one to another on the direction of respondent No. 3.
5. That during this period appellant performed her duty to the satisfaction of officers with full devotion and liability and there had no complaint was against the appellant in respect of her responsibility as well as duty. Copy of attendance register is annexed as Annexure "B".
6. That respondent No. 3 stopped monthly salary of appellant due to some technicalities that the time of appointment low qualification, in this connection some of the teachers has been filled constitutional petitioner before Peshawar High Court, Abbottabad Bench. Copy of writ petition is annexed as Annexure "C".

7. That appellant approached to respondent No. 3 for release her salary whereby respondent No. 3 assured that he will resolve her grievances very soon alongwith all others 30 teachers pending before respondent No. 1 of final order in respect of proper pay scale up-gradation and allowances.
8. That appellant again visited to the offices of respondent No. 3, 12 July, 2018 for information and whereby appellant received impugned order and respondent No. 3 stated you are removed from the service on 23/12/2017 and since last 7 months you are not employee of the department. Copy of impugned order is annexed as Annexure "D".
9. That on ~~24~~07/2018 appellant filed departmental appeal before the respondent No. 2 but till that respondent No. 3 not passed any order on the said appeal and similarly not given any response to the appellant. Copy of departmental appeal is annexed as Annexure "E". Hence his service appeal on the following grounds;-

GROUND:-

- a. That impugned order dated 22/12/2017 against the law and fact hence liable to be a set-aside.
- b. That all allegations mentioned in the impugned order is self and so-called.
- c. That all proceeding conducted in absence of appellant.
- d. That respondent at the time of passing impugned order ignored all basic principal of E & D Rules and principal of natural justice.
- e. That order of respondent No. 3 dated 23/12/2017 against the constitutional granted rights of appellant.
- f. That respondent No. 3 issued impugned order without show cause notice, inquiry in absence of appellant.

It is, therefore, humbly prayed that, on acceptance of this service appeal impugned order dated 23/12/2017 may kindly be declared null and void and appellant be reinstated in service alongwith all back benefits, any other relief which this Honourable Tribunal deemed fit proper in the interest of justice.

Basim

...APPELLANT

Through

Dated: 12/11 /2018

H. Khan

(HAMAYUN KHAN)

Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Basim

...APPELLANT

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____ /2018

Mst. Bas Pari wife of Shabbir, daughter of Khani Zaman, resident of Kaley Medan P.O Jejal Tehsil Palas Kohistan (EX PTC/ PST Teacher).

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY IF ANY.

Respectfully Sheweth;-

1. That the above titled appeal is being filed before this Honourable Tribunal and contents of the same may kindly be treated as integral part of this application.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favour of the appellant.
3. That valuable rights of reinstatement in service of the appellant as PST teacher are involved.

4. That the impugned order received on 20 July, 2018 from the office of respondent No.3 and respondent No.3 could not delivered the same within time.
5. That delay in filing of service appeal is not willful.

It is therefore, humbly requested that the delay if any may kindly be condone in the interest of justice.

...APPELLANT

Through

Dated: 12/11/2018


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT

ANNEXURE 'A'

9

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY KOHISTAN AT DASSU.

APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee, the competent authority has been pleased to appoint the following (Female) Middle Passed candidates of Tehsil Palas, Pattan & Dassu fresh (Union Councils etc.) against the vacant Posts of PTC in BPB-04 (Rs.2345-100-5345) on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

S.No	Name of candidate	Father's Name	Residence/IC	Apptt. Pt.	School where posted	Remarks
1	Fatima Mustafa	Mohd Mustafa	Bar Shrial	PTC	GGPS Saeedabad	Agmt V Post
2	Rukheana Begum	Khan Wali	Bar Shrial	PTC	GGPS Banjar Yanjoel	-do-
3	Aalya Mustafa	Mohd Mustafa	Bar Shrial	PTC	GGPS Datt Sharakot	-do-
4	Ban Pari	Khanizaman	Kolai	PTC	GGPS Banjar Yanjoel	-do-
5	Bibi Hajra	Morzi	Kolai	PTC	GGPS Bader Kot Kolai	-do-
6	Gul Bibi	Khanizaman	Kolai	PTC	GGPS Saeedabad	-do-
7	Amlina Bibi	Abdullah	Kuz Para	PTC	GGPS Bader Kot Kolai	-do-
8	Chand Bibi	Gul Zareen	Kuz Para	PTC	GGPS Gulababad	-do-
9	Irrum Naz	Abdul Gayum	Madakhal	PTC	GGPS Datt Sharakot	-do-
10	Gulshan	Abdul Gayum	Madakhal	PTC	GGPS Madakhalabad	-do-
11	Bibi Alysha	Hazrat Jamil	Shrad	PTC	GGPS Madakhalabad	-do-
12	Arfa Bibi	Khan Wali	Shilkanabad	PTC	GGPS Saad Kot	-do-
13	Bibi Balra	Amal Khan	Shilkanabad	PTC	GGPS Shilkanabad	-do-
14	Bibi Hanifa	Balfur Rahman	Shilkanabad	PTC	GGPS -do-	-do-
15	Mah Jaboon	M. Gulfaraz	Shilkanabad	PTC	GGPS Bar Gaboor	-do-
16	Farhana Balf	Balfur Rahman	Shilkanabad	PTC	GGPS -do-	-do-
17	Zalib-un Nisaa	M. Gulfaraz	Shilkanabad	PTC	GGPS Haran	-do-
18	Khazana	Hakim Khan	Sharakot	PTC	GGPS -do-	-do-
19	Bibi Amra	Biffat	Pattan	PTC	GGPS Gulababad No.2	-do-
20	Gul Famlr	Bikandar	Dassu	PTC	GGPS Kuz Chawa	-do-
21	Gul Badan	Bikandar	Dassu	PTC	GGPS Atar Abad	-do-
22	Shakira Bibi	Balfur Malook	Goshall	PTC	GGPS -do-	-do-
23	Johara Bibi	Balfur Malook	Goshall	PTC	GGPS Dar Bah	-do-
24	Mohas Begum	Rash Khan	Goshall	PTC	GGPS -do-	-do-
25	Parzana	Rash Khan	Goshall	PTC	GGPS Khatzakhol	-do-
26	Gul Rohan	Pir Dad	Goshall	PTC	GGPS -do-	-do-
27	Gulshan Bibi	Bakhtiar	B. Jalkot	PTC	GGPS Bar Asol	-do-
28	Lash Khapri	Shah Zareen	Bar Jalkot	PTC	GGPS -do-	-do-
29	Elizabeth Shahoon	Shah Zareen	B. Jalkot	PTC	GGPS Jaloo Chorna	-do-
30	Bittam Jehan	Abdul Azim	B. Jalkot	PTC	GGPS Samarabad	-do-
31	Amlina Bibi	Inzar Gul	Shilkanabad	PTC	GGPS Samarabad	-do-
32	Hanifa Bibi	Inzar Gul	Shilkanabad	PTC	GGPS Banjar Yanjoel	-do-

CONDITIONS:

- Their appointments are purely on temporary basis and liable to termination at any time / stage with out assigning any reason/notice.
- Their Certificates/ Domicile Certificates if not verified earlier, should be verified by the DDO (F) to Mr. Abdur Rahman I/C Dy: D.O (F) S&L Kohistan before handing over their charge.
- Charge reports should be submitted to all concerned.
- No TA/DA is allowed to any one.
- They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belongs.
- In case any of the above candidates failed to assume the charge of their posts with in fifteen days, their appointments will automatically stand cancelled.
- They should not be allowed to take over charge if their age is less than 18-years and above 35-years
- They should produce age and health certificate from EDO Health Kohistan before taking of charge.

(Zahir Shah)
District Coordination Officer
Kohistan at Dassu

Enst: No. 856-96 / App/PTC (F) I/C who Merit /2005 Dated Kohistan the 25-10/2005.

Copy of the above is forwarded to:-

- Director Schools & Literacy NWFP Peshawar.
- P/S to Minister of Education NWFP Peshawar.
- P/S to Secretary Government of NWFP (B & L) Department Peshawar.
- Executive District Officer Schools & Literacy Kohistan.
- District Accounts Officer Kohistan.
- District Officer Schools & Literacy Kohistan.
- Deputy District Officer (F) S&L Kohistan.
- Candidates concerned.

(Malik Abdul...)
Executive Officer
Schools & Literacy Kohistan.

ANNEXURE 'B' ۵۰۹۰

رجسٹر حاضرہ مدرسیں

نمبر	نام	بابت ماہ			بیماری	بیماری	بیماری	بیماری	بیماری	بیماری	بیماری
		گولڈ	سولڈ	سولڈ							
۱	PP										۱
۲	PP										۲
۳	PP										۳
۴	PP										۴
۵	PP										۵
۶	PP										۶
۷	PP										۷
۸	PP										۸
۹	PP										۹
۱۰	PP										۱۰
۱۱	PP										۱۱
۱۲	PP										۱۲
۱۳	PP										۱۳
۱۴	PP										۱۴
۱۵	PP										۱۵
۱۶	PP										۱۶
۱۷	PP										۱۷
۱۸	PP										۱۸
۱۹	PP										۱۹
۲۰	PP										۲۰
۲۱	PP				Absent						۲۱
۲۲	PP										۲۲
۲۳	PP										۲۳
۲۴	PP										۲۴
۲۵	PP										۲۵
۲۶	PP										۲۶
۲۷	PP										۲۷
۲۸	PP										۲۸
۲۹	PP										۲۹
۳۰	PP										۳۰
۳۱	PP										۳۱

۲۰۱۶ء
۱۱ مئی
پو کٹر

موسم بیماری
۱۱ مئی
۱۲ مئی
۱۳ مئی
۱۴ مئی
۱۵ مئی
۱۶ مئی
۱۷ مئی
۱۸ مئی
۱۹ مئی
۲۰ مئی
۲۱ مئی
۲۲ مئی
۲۳ مئی
۲۴ مئی
۲۵ مئی
۲۶ مئی
۲۷ مئی
۲۸ مئی
۲۹ مئی
۳۰ مئی
۳۱ مئی

۲۲-۵-۱۶
۲۳-۵-۱۶
۲۴-۵-۱۶

Absent

Absent

تعداد	میزان	حالیہ	میزان	سابقہ	میزان	حالیہ	میزان	سابقہ	میزان	حالیہ
۱										
۲										
۳										
۴										
۵										
۶										
۷										
۸										
۹										
۱۰										
۱۱										
۱۲										
۱۳										
۱۴										
۱۵										
۱۶										
۱۷										
۱۸										
۱۹										
۲۰										
۲۱										
۲۲										
۲۳										
۲۴										
۲۵										
۲۶										
۲۷										
۲۸										
۲۹										
۳۰										
۳۱										

40 // 11
رجسٹر حاضری مدرسین

2016ء مارچ

بابت ماہ

ہذا محکمہ	کوئٹہ	مجلہ نسیم	لیس پری	نام	مشاور الحق
-----------	-------	-----------	---------	-----	------------

دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد		
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	1	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	2	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	3	PP														
PP			مجلہ نسیم	12:35	مجلہ نسیم	8:00	BasPa	12:35	BasPa	8:00	BasPa	8:00	4	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	5	PP														
PP													6	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	7	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	8	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	9	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00							10	PP														
PP			مجلہ نسیم	12:35	مجلہ نسیم	8:00	BasPa	12:35	BasPa	8:00	BasPa	8:00	11	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	12	PP														
PP													13	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	14	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	15	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	16	PP														
PP			مجلہ نسیم										17	PP														
PP			مجلہ نسیم	12:35	مجلہ نسیم	8:00	BasPa	12:35	BasPa	8:00	BasPa	8:00	18	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	19	PP														
PP													20	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	21	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	22	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	23	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	24	PP														
PP			مجلہ نسیم	12:35	مجلہ نسیم	8:00	BasPa	12:35	BasPa	8:00	BasPa	8:00	25	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	26	PP														
PP													27	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	28	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00							29	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	30	PP														
PP			مجلہ نسیم	1:35	مجلہ نسیم	8:00	BasPa	1:35	BasPa	8:00	BasPa	8:00	31	PP														

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	

شیخ شیشری سٹور 8 اردو بازار لاہور۔ فون: 042-37226599

دستخط ہیڈ ماسٹر

رجسٹر حاضری مدرسین

12
12

بابت ماہ

فروری 2016ء

رد نمبر	نام	پست و خدمات الحاقی	گن لیس	لیس پری	تاریخ
---------	-----	--------------------	--------	---------	-------

تاریخ	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	
1	8:00	PP																	
2	8:00	PP																	
3	8:00	PP																	
4	8:00	PP																	
5	8:00	PP																	
6	الوار	PP																	
7	8:00	PP																	
8	8:00	PP																	
9	8:00	PP																	
10		PP																	
11	8:00	PP																	
12	8:00	PP																	
13	الوار	PP																	
14	8:00	PP																	
15	8:00	PP																	
16	8:00	PP																	
17	8:00	PP																	
18	8:00	PP																	
19	8:00	PP																	
20	الوار	PP																	
21	8:00	PP																	
22	8:00	PP																	
23	8:00	PP																	
24	8:00	PP																	
25	8:00	PP																	
26	8:00	PP																	
27	الوار	PP																	
28	8:00	PP																	
29																			
30	8:00																		
31	8:00																		

استاذ

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقہ												
استحقاق												
بیماری												
میزان												

رجسٹر حاضری مدرسین

13

جنوری 2016ء

بابت ماہ

ہیرا الحق
چونگیا

گل نسیم

لبس پری

نمبر

مدرسین

روزانگی	روزانہ	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روائی	دستخط	آمد	دستخط	روزانہ	دستخط
1	PP							گل نسیم	12:35	8:00	BasPas	10:35	BasPas	8:00	BasPas		
2	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
3	PP															الوار	
4	PP							گل نسیم	1:35	8:00	A	A	A	A	A		
5	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
6	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
7	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
8	PP							گل نسیم	12:35	8:00	BasPas	12:35	BasPas	8:00	BasPas		
9	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
10	PP														الوار		
11	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
12	PP							گل نسیم	1:35	8:00	A	A	A	A	A		
13	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
14	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
15	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
16	PP							گل نسیم	12:35	8:00	BasPas	12:35	BasPas	8:00	BasPas		
17	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
18	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
19	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
20	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
21	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
22	PP							گل نسیم	12:35	8:00	BasPas	12:35	BasPas	8:00	BasPas		
23	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
24	PP														الوار		
25	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
26	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
27	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
28	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
29	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
30	PP							گل نسیم	1:35	8:00	BasPas	1:35	BasPas	8:00	BasPas		
31	PP														الوار		

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

رجسٹر حاضری مدرسین

14
19

بابت ماہ

2015ء

دسمبر
مہینہ

نمبر	بیس پیری	کل لیسیم	نمبر	بیس پیری	کل لیسیم	نمبر	بیس پیری	کل لیسیم
------	----------	----------	------	----------	----------	------	----------	----------

تاریخ	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	
1	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
2	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
3	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
4	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
5	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
6	الوار															
7	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
8	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
9	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
10	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
11	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
12	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
13	الوار															
14	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
15	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
16	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
17	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
18	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
19	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
20	الوار															
21	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
22	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
23	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
24	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
25	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
26	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
27	الوار															
28	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
29	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
30	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas	8:00	BasPas	1:35	BasPas
31	الوار															

Attest
H/S
A

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	قسم رخصت
انفاقہ										انفاقہ
استحقاق										استحقاق
بیماری										بیماری
میزان										میزان

رجسٹر حاضری مدرسین ۱۵

تاریخ

نومبر

۲۰۱۵ء نومبر

بابت ماہ

ردیف	نام	پس پیری	کل نسیم					تعداد	رواگی
		الوار						1	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	2	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	3	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	4	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	5	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	6	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	7	PP
PP		الوار						8	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	9	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	10	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	11	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	12	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	13	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	14	PP
PP		الوار						15	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	16	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	17	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	18	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	19	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	20	PP
PP		الوار						21	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	22	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	23	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	24	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	25	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	26	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	27	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	28	PP
PP		الوار						29	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	30	PP
PP		8:00	1:35	8:00	1:35	8:00	1:35	31	PP

ردیف	نام	پس پیری	کل نسیم	حال	سابقہ	میزان	حال	سابقہ	میزان

رجسٹر حاضری مدرسین 15/15

بابت ماہ اکتوبر 2015ء

بابت ماہ

نمبر	بیس پری	کل نسیم	نام	عہدہ
1	بیس پری	کل نسیم	سید الحق	جو کبیر

تاریخ	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی
1	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	1
2	8:00	Baq	12:35	Baq	8:00	کل نسیم	12:35	کل نسیم	8:00	Baq	12:35	Baq	8:00	Baq	12:35	Baq	8:00	2
3	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	3
4	الوار																	4
5																		5
6																		6
7																		7
8																		8
9																		9
10																		10
11	الوار																	11
12	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	12
13	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	13
14	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	14
15	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	15
16	8:00	Baq	12:35	Baq	8:00	کل نسیم	12:35	کل نسیم	8:00	Baq	12:35	Baq	8:00	Baq	12:35	Baq	8:00	16
17	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	17
18	الوار																	18
19	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	19
20	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	20
21	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	21
22	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	22
23	8:00	Baq	12:35	Baq	8:00	کل نسیم	12:35	کل نسیم	8:00	Baq	12:35	Baq	8:00	Baq	12:35	Baq	8:00	23
24	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	24
25	الوار																	25
26	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	26
27	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	27
28																		28
29	8:00	Baq	1:35	Baq	8:00	کل نسیم	1:35	کل نسیم	8:00	Baq	1:35	Baq	8:00	Baq	1:35	Baq	8:00	29
30	8:00	Baq	12:35	Baq	8:00	کل نسیم	12:35	کل نسیم	8:00	Baq	12:35	Baq	8:00	Baq	12:35	Baq	8:00	30
31																		31

مہرم کی چھٹیاں

Handwritten signature/initials

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
میزان			میزان			میزان			میزان		
بیماری			بیماری			بیماری			بیماری		
استحقاق			استحقاق			استحقاق			استحقاق		
اتفاقية			اتفاقية			اتفاقية			اتفاقية		

رجسٹر حاضری مدرسین



20 دسمبر
مہینہ الحاق
جوئید

بابت ماہ

بس لیری

روز	وقت	نوع	مدرسین	حاضر	غائب	بیمار	مذکورہ
1	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
2	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
3	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
4	8:00	BasPa	12:35	BasPa	8:00	گل نسیم	12:35
5	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
6	الوار						
7	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
8	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
9							
10	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
11	8:00	BasPa	12:35	BasPa	8:00	گل نسیم	12:35
12	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
13	الوار						
14	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
15	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
16	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
17	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
18	8:00	BasPa	12:35	BasPa	8:00	گل نسیم	12:35
19	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
20	الوار						
21	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
22	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
23	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
24	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
25	8:00	BasPa	12:35	BasPa	8:00	گل نسیم	12:35
26							
27	الوار						
28	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
29							
30	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35
31	8:00	BasPa	1:35	BasPa	8:00	گل نسیم	1:35

موضوع	حاضر	سابقہ	میزان	حاضر	سابقہ	میزان
اتفاقہ						
استحقاق						
بیماری						
میزان						

ANNEXURE "C" 18

IN THE PESHAWAR HIGH COURT ABBOTTABAD BENCH,
ABBOTTABAD

Writ Petition No. 978 -A/2017

1. Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
2. Robina Bibi D/o Haji Ameer Zada R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
3. Mehnas Begum Daughter of Rush R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
4. Tahira Bibi D/o Sher Muhammad R/o Tehsil Palas, District Kohistan.
5. Sadia Bibi D/o Sher Muhammad R/o Tehsil Palas, District Kohistan.
6. Sonia Bibi D/o Sher Muhammad R/o Tehsil Palas, District Kohistan.
7. Kalsoom Bibi D/o Sikandar Khan R/o Jamira Jalkot, District Kohistan.
8. Sargina Bibi D/o Abdul Hanan R/o Kameela Tehsil Dasoo, District Kohistan.
9. Salma Bibi D/o Qalandar Khan R/o Jalkot Kameela Tehsil Dasoo, District Kohistan.
10. Gul Napoor w/o Badar R/o Kameela Tehsil Dasoo, District Kohistan.
11. Farzana D/o Rush Khan w/o Abdul Ghafaar R/o Jalkot Tehsil Dasoo, District Kohistan.
12. Sakeena Bibi D/o Muhammad Nazir Shah R/o Tehsil Palas District Kohistan.
13. Gul Zaron Bibi w/o Wazeen Khan D/o Ameer Zada R/o Kolai P/o Ranooliyan Tehsil Palas, District Kohistan.
14. Parveen Bibi D/o Muhammad Sirtaj R/o Kolai P/o Ranooliyan Tehsil Palas, District Kohistan.
15. Bibi Hajira D/o Haibat Khan w/o Muhammad Nisar R/o Shah Makhanabad Tehsil Palas, District Kohistan.
16. Bibi Hajira D/o Mehraaj R/o Kolai, Tehsil Palas, District Kohistan.
17. Peegaloo W/o Abdul Rasheed R/o Pattan District Kohistan.
18. Zainab D/o Muhammad Shareen R/o Palas, District Kohistan.
19. Hassan Pari daughter of Malik Haider, wife of Munshi, resident of Palas, District Kohistan.

Attended
H

20. Gul Sanam son of Ameer Zad, resident of Palas, District Kohistan.
21. Shaheen Bibi daughter of Ilyas Khan, resident of Dassu, District Kohistan.
22. Najma Bibi daughter of Sarbaz Khan, resident of Dassu, District Kohistan.

.... PETITIONERS

VERSUS

1. Secretary to the Government of Khyber Pakhtunkhwa, in the Department of Elementary & Secondary Education Department, Peshawar.
2. Deputy Director, Establishment (F), Elementary & Secondary Education Department, Peshawar.
3. District Education Officer (F), Dassu, Kohistan.
4. Secretary to the Government of Khyber Pakhtunkhwa, in the Department of Finance, Peshawar.
5. Sub Divisional Education Officer Dassu, District Kohistan.
6. Sub Divisional Education Officer Pattan, District Kohistan.
7. Sub Divisional Education Officer Palas, District Kohistan.

.... RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE
 CONSTITUTION OF ISLAMIC REPUBLIC OF
 PAKISTAN, 1973, FOR ISSUANCE OF A
 DECLARATION TO THE EFFECT THAT STOPPAGE
 OF SALARY OF THE PETITIONERS IN THE WAKE
 OF LETTER NO 1973/F NO 04/F/INQUIRY DATED
 PESHAWAR 14/12/2016, INSTEAD OF UPGRADING
 HER FROM BPS-04 TO BPS-12 AS PER THIER
 ENHANCE QUALIFICATION ACCORDING TO THE

Attested
 H. J. A.

20
REQUIREMENT FOR THE PST AND STILL NOT
UPGRADED, IS MALAFIDE AGAINST THE OWN
POLICY OF THE RESPONDENTS, IS UNLAWFUL
AND WITHOUT LAWFUL AUTHORITY

PRAYER: ON ACCEPTANCE OF THE INSTANT
WRIT PETITION, IT BE DIRECTED THAT SALARY
OF THE PETITIONERS WITHHELD FROM MAY
2016 TO DATE AND ALSO TO DIRECT THE
RESPONDENTS TO UPGRADE THE PETITIONERS
FORM BPS-04 TO BPS-12, THE GRADE
PERMISSIBLE FOR A PTC TEACHER, IN THE
WAKE OF ENHANCED EDUCATIONAL
QUALIFICATION OF THE PETITIONERS. ANY
OTHER RELIEF AS MAY BE DEEMED FIT FOR
THE PETITIONERS MAY ALSO BE GIVEN TO
THEM.

Respectfully Sheweth:

Brief facts giving rise to the instant writ petition are arrayed
as under:-

FACTS:-

1. That, the petitioners were appointed as PTC Teacher in
BPS-04 upon educational qualification as Middle
standard. (Copies of appointment orders are attached

M. S. Talwar
H. S. Talwar

as Annexure "A", while school leaving certificate as a Middle qualified student are attached as Annexure "B").

2. That, the petitioners improved/enhanced their qualification and qualified Matriculation exam from BISE Abbottabad. (Copies of DMC's SSC are attached as Annexure "C").
3. That, in due course it was decided that the PTC teachers who have not qualified metric, the basic requirements for appointment as a PTC Teacher, his or her services shall be dispensed with, and likewise the ones who have enhance their qualification upto the requisite requirement that is Metric shall be upgraded.
4. That, it was in the above background that a direction was passed vide impugned letter to act upon the above formula. (Copy of the impugned letter No letter no 1973/F No 04/F/Inquiry dated Peshawar 14/12/2016 is attached as Annexure "D").
5. That, though, the service of the petitioners were not terminated, however, respondent no 2 ordered stoppage of salary without any lawful reason w.e.f 01/05/2016 to date. No order in writing has also been passed in this regard.

Attested
H

- c. That, in due course of time and inquiry was ordered to sought out the case is of PTC teachers who still were holding qualification of middle class and those who held enhanced their qualification, to bring it at par with the requisite qualification for appointment of a PTC Teacher in BPS-12. It was further directed that those who had enhanced their qualifications should be upgraded forthwith. This was not done in the petitioners' case and their salary stop with any lawful reason.
- d. Those, after enhancement of qualification, the petitioners are entitled for up gradation in grade 12, instead of stoppage of their salary due to non of their fault.
- e. That, the petitioners belong to an extreme backward and hardship area and hail from a very poor background, having a large family to support, therefore stoppage of their salary and not granting them the due grade is a straight blow on the backbone. An exercise not permissible under the law or the principle are equity, justice and fair play.
- f. That, there is no other remedy available to the petitioners except the instant writ petition, therefore no latches can be laid at their doors.

Attested
H
JH

- g. That, addresses of parties are given correctly at the head note of the petition.
- h. That Court fee stamp paper worth Rs.500/- is attached herewith.

It is therefore humbly prayed that on acceptance of the instant writ petition, it be directed that salary of the petitioners withheld from May 2016 to date and also to direct the respondents to upgrade the petitioners form BPS-04 to BPS-12, the grade permissible for a PTC Teacher, in the wake of enhanced educational qualification of the petitioners. Any other relief as may be deemed fit for the petitioners may also be given to them.

Dated: 10/10 /2017

Through

...PETITIONERS

(SARDAR NASIR ASLAM KHAN)
Advocate High Court Abbottabad

VERIFICATION

Verified on oath that the contents of writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.


...PETITIONERS

24

8

IN THE PESHAWAR HIGH COURT ABBOTTABAD
BENCH, ABBOTTABAD

Writ Petition No 978

Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o
Jabjaal, Tehsil Palas, District Kohistan & others
.... Petitioners

VERSUS

Secretary to the Government of Khyber
Pakhtunkhwa, in the Department of Elementary &
Secondary Education Department, Peshawar &
others

.... Respondents

WRIT PETITION

AFFIDAVIT

I, Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o
Jabjaal, Tehsil Palas, District Kohistan, do hereby declare on
oath that the contents of writ petition are true and correct to the
best of my knowledge and belief & nothing has been concealed
and suppressed from this Honourable Court.

Allesed
H
OR

Bass Pari
DEPONENT 13503-9421323-0

Identified by

[Signature]

(Sardar Nasir Aslam Khan)
Advocate High Court Abbottabad

AFFIDAVIT

66781/133

Receipt No: 132

I hereby affirm that the above was verified on Solemn
Affirmation *Allesed* before me on this
7th day of Oct. 2008
at *Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan*
Peshawar. I, the undersigned, do hereby certify that the above is true to the best of my knowledge and belief and nothing has been concealed and suppressed from this Honourable Court.

[Signature]
Oath Commissioner
(Additional Registrar)
Peshawar High Court (Circuit Bench)

7/10/17



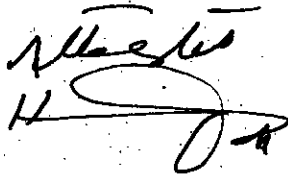
25

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET


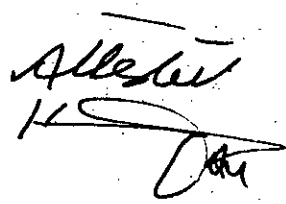

Court of.....

Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
24.10.2017	<p><u>W.P.No.978-A/2017.</u></p> <p>Present:- Sardar Nasir Aslam Khan, Advocate for petitioners.</p> <p style="text-align: center;">***</p> <p>The learned counsel for petitioners stated at the bar that the petitioners are neither being paid salary according to their original appointments nor salary for up-graded posts in accordance with their memo dated 14.12.2016; therefore, a pre-admission notice be issued to respondent No.3 for a short date in office. The office is directed to club this petition with writ petition No.527-A/2017 and fix both the same on one and the same date.</p> <div style="text-align: right; margin-top: 20px;">  JUDGE </div> <div style="text-align: right; margin-top: 10px;">  JUDGE </div> <div style="text-align: center; margin-top: 50px;">  </div>

26

PESHAWAR HIGH COURT, ABBOTTABAD BENCH
ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
1	2
14.11.2017	<p><u>C.M No.895-A/2017 in W.P. No.978-A/2017</u></p> <p>Present: Sardar Nasir Aslam Khan, Advocate, for the petitioner.</p> <p>Mr. Yasir Zahoor Abbasi, AAG, for respondents.</p> <p>***</p> <p><u>SYED MUHAMMAD ATTIQUE SHAH, J:</u> Through instant CM, the petitioner seeks impleadment of applicants as petitioners being similarly placed alongwith the petitioner in the present writ petition. Allowed. Office is directed to make necessary entry in the heading of the writ petition.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: center;"></p> <p style="text-align: right;"> JUDGE</p>

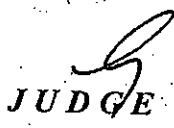

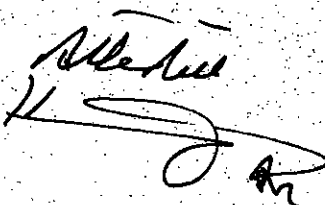
27

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....



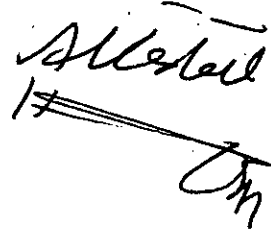
Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
23.01.2018	<p><u>W.P.No.978-A/2017.</u></p> <p>Present:- Clerk of counsel for petitioners. Raja Muhammad Zubair, AAG for respondents.</p> <p>***</p> <p>As the legal fraternity is observing strike on the call of Khyber Pakhtunkhwa Bar Council, therefore, the case is adjourned to a date fixed by the office.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"></p>

28

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
22.05.2018	<p data-bbox="925 662 949 700">2</p> <p data-bbox="502 751 829 802"><u>W.P No.978-A/2017</u></p> <p data-bbox="502 828 1388 930">Present: Sardar Nasir Aslam Khan, Advocate, for the petitioner.</p> <p data-bbox="686 955 1388 1133">Mr. Yasir Zahoor Abbasi, Assistant AG alongwith Raj Muhammad Khan, DEO(F) Kohistan, respondent No.2, Fozal Rabia, ADEO (F) Kohistan.</p> <p data-bbox="917 1159 981 1197">***</p> <p data-bbox="502 1235 1388 1617">The latter seeks time to file parawise comments on behalf of respondents No.1 to 3. Adjourned. May do within three days. Notice be also issued to respondent No.4 to file parawise comments before the next date of hearing. Adjourned to 07.06.2018.</p>
	<p data-bbox="1133 1643 1276 1745"></p> <p data-bbox="1101 1732 1276 1783">JUDGE</p>
	<p data-bbox="1133 1860 1276 1911"></p> <p data-bbox="1101 1885 1276 1936">JUDGE</p>
	<p data-bbox="1053 1987 1324 2216"></p>

29

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A'
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
07.06.2018	<p><u>W.P. No. 978-A/2017</u></p> <p>Present:-</p> <p>Sardar Nasir Aslam Advocate for the petitioner.</p> <p>Mr. Yasir Zahoor Abbasi, Assistant AG along with Fazal Rahim ADEO (F) Kohistan.</p> <p>***</p> <p>Former wants to submit rejoinder to para-wise comments filed by the respondents. May do so within a fortnight.</p> <p>Adjourned to a date in office.</p> <p><u>CM NO. 4-A/2018</u></p> <p><u>SYED ARSHAD ALI J.-</u> Learned counsel for the petitioner states that he would not press instant petition, provided he may be permitted to file separate writ petitions on behalf of the applicants/petitioners. In this view of the matter, instant CM stands dismissed. However, the applicants would be at liberty to file separate writ petitions, if need arise.</p> <p><u>Announced.</u> 07.06.2018</p> <p><i>[Signature]</i> JUDGE</p> <p><i>[Signature]</i> JUDGE</p>

30

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....

Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
19.09.2018	<p><u>W.P.No.978-A/2017.</u></p> <p>Present:- Sardar Nasir Aslam Khan, Advocate for petitioners.</p> <p>Mr. Yasir Zahoor Abbasi, Asstt. A.G for respondents alongwith Fazal Rahim, ADEO (F) Kohistan.</p> <p>***</p> <p>The latter seeks time to file better comments on behalf of respondent No.3. May do so within a fortnight.</p> <p>Adjourned to a date in office.</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;"><i>Alhadi</i> <i>11/09/18</i></p>

ANNEXURE D

31

OFFICE OF THE DISTRICT EDUCATION OFFICER, (F) KOHISTAN.

Ph: & Fax No. 0998407225

Notification:

WHERE AS reported absent by ASDEO/SDEO /IMU. Where as show cause notices were served on Home addresses available in this office through registered post and where as neither joined duties nor submitted convincing replies.

WHEREAS final show cause notice was served in the DAILY NEWS PAPER Shamal Abbottabad on 17/9/2015 in which directed to submit replies for long. will full absence from duty but neither attended the schools nor submitted convincing replies to the under signed.

Hence, being the Competent Authority imposed the major penalty of removal from service under E & D Rules 2011 section (2) with effect from date mentioned against the name of each and recovery of pay for the absence period may be made.

S.No.	Name of teachers with School	Terminated w.e.f.
1	Bibi Amina PST GGPS Kuz Saprona	23-4-2016
2	Memona PST GGPS Bankad Villag	28-3-2016
5	Shaheen PST GGPS Dhook BZ	21-5-2016
4	Ruby Bibi PST GGPS Dhook BZ	21-5-2016
5	Nazmeen PST GGPS Dhoop Gai Jijal	23-4-2016
6	Rahmat bibi PST GGPS Kuz Saprona	23-4-2016
7	Mehnaz Begum PST GGPS Sultan Abad	10-3-2016
8	Lubna Janan PST GGPS Sultan Abad	18-5-2016
9	Gul badan Shah PST GGPS Darnat	21-5-2016
10	Kansir Bibi PST GGPS Shamal Mujawar Abad	25-5-2016
11	Gul Naseem PST GGPS Khizar Abad	25-5-2016
12	Bas Pari PST GGPS Khizar Abad	25-5-2016

District Education Officer
(Female) Kohistan.

/2017

No 4328-39 / DEO(F)KH' Dated 23-12

Copy of the above is forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa
2. The Deputy Commissioner Kohistan upper, Lower and Kolai Pallas.
3. The District Monitoring Officer (IMU) District Kohistan.
4. The District Accounts Officer, Kohistan.
5. The Sub Divisional Education Officer (F) Dasso, Pattan and Pallas Kohistan with the direction to ensure th recover of absent period pay from the Teacher concerned if already paid.
6. The ASDEOs Circle.
7. Teachers concerned.

District Education Officer
(Female) Kohistan.

23/12/17
District Education Officer
(Female) Kohistan.

خدمت جناب ڈائریکٹر ایگزیکٹو اینڈ سیکرٹری ایجوکیشن K-PK
کے پی کے لٹریچر

عنوان :-

حکومت اہل

اہل لہائے خلی سروسز ڈائریکٹی سلیجہ تنخواہیں از جنوری 2018 تا فیصلہ

جناب عالی!

1- لہائے سائلہ ایل خریدیں گئے ان سے تعلق رکھتی ہے اور کوہستان پولی ٹیواہ کے
پیمانہ و دود افتاد علاقہ میں ریٹنشن لہائے ہے -

2- لہائے سائلہ کی تعیناتی بحیثیت Pst / Ptc پیمبرک سال 2005 میں ہوئی -

3- لہائے لہائے از تعیناتی سائلہ ضلع کوہستان کے مختلف سیکولوں میں اپنی خدمات
سدا انجام دیتی رہی ہے - اور 15 جولائی 2018 تک سدا انجام دی -

4- لہائے سال 2015 میں ای - ڈی - او صاحب نے سائلہ کی تنخواہ کو بند کر دیا -

جب سائلہ ای - ڈی - او صاحب کے دفتر بابت بند تنخواہ کی وجوہات
مائل کو بیان ہوئے کہ آپ کی تعیناتی سال 2005 میں بوطابق قانون
نہ ہے اور آپ لوگوں کے پاس مطلوبہ تعلیم نہ ہونے کی بنا پر تنخواہ
کو بند کیا گیا ہے -

5- لہائے ای - ڈی - او صاحب سے ای درخواست کی گئی جس پر لہائے لہائے
آپ لوگوں والیں ڈائریکٹر و سیکرٹری کے پاس بھیج دیا ہے اور
جب تک فیصلہ ہو کر نہیں آتا اس وقت تک تنخواہ بند رہے گی -

6- لہائے سائلہ تنخواہ کی بابت دفعہوں کا فیصلہ لگائی رہی اور 20 جولائی
2018 کو جب سائلہ از دفتر ای - ڈی - او صاحب کی کو ایلعداد
نے بتایا کہ آپ کو 17-18-19-20 کو نوکری سے لہ طرف کر دیا گیا ہے -

7- لیدر مذکورہ حکم میں سائل کے خلاف ڈیوٹی سے خیر حافد رہنے کی الزامات لگائے گئے ہیں۔

8- لیدر سائل از سال 2005 سے تاحال بھی خیر حافد نہ رہی ہے اور بظاہر قانون لیدر از اجازت الیس - ڈی - او (او بی ڈی) - او اجازت کے مطابق اپنی سالانہ چھٹیال کر چکی ہے۔ صفا باقاعدہ اجازت مختلف اوقات میں افسان نے دی تھیں۔

9- لیدر مذکورہ حکم سے اسد غلط خلاف قانون و خلاف واقعات ہے۔ چونکہ سائل کو کوئی شوکارڈ نوٹس و دیگر کیسی قسم کی نوٹی نوٹس وغیرہ جاری نہیں کیا گیا۔ اور سائل کی خیر موجودگی والا علی میں مذکورہ حکم جاری کیا ہے۔ جو کہ سائل کے ساتھ ناانصافی ہے۔ لہذا استدعا ہے کہ سائل کو نوٹری لپز خال کرنے اور سابقہ تمام نوٹس اپنی ادا کرنے کا حکم صادر فرمایا جائے۔

العارض
 لیس لپی زوجہ شبید سائل کوٹی میداں ڈاکٹر انجینئر جیپال پالیس
 سائل - Post Post
 کوٹیاں

وکالت نامہ

Before The K.P.K. Service Tribunal بعدالت جناب
 vs. Bus Pari بنام Govt
 Appellant منجانب Appeal دعوی یا جرم

باعث تحریر آنکہ

مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوابدہی بمقام Asst. Tabac

Hamayan Khan & Samera Nawaz

بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشگی پر خود یا بذریعہ مختیار خاص رو بروعدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشگی پر مظہر حاضر نہ دیا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر یا بروز پکھری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پر دانستہ صاحب شمل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل گرانے اور کرنے، نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم بیان دینے اور سپرد دہائی وراثی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا نسوئی ڈگری یکطرفہ درخواست حکم اتہامی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ پیروی مختیار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل اور اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشگی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختیار نامہ لکھ دیا ہے کہ سند ہے۔

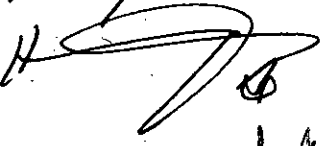

مضمون مختیار نامہ سن لیا ہے اور اچھی طرح سمجھا لیا ہے اور منظور ہے۔

الرتوم 12/11/15

مسکو بس دعویٰ

Bus Pari

ایمان

Accepted



**BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.**

Service Appeal No. 1398/18

BastPari

APPELLANT.

Versus.

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Peshawar & others.

RESPONDENTS

INDEX

S.NO	Description of Document	Annexure	Pages
1	Para wise comments with affidavit		1 - 4
2	Appointment order	A	5
3	Absent Report	B	6
4	Show Cause Notice	C	7
5	Newspaper cutting	D	8
6	Termination Order	E	9

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KPK
PESHAWAR.

Service Appeal#1398/2018

BAS PARIAPPELLANT

VERSUS

- 1. Secretary (E&SE) Govt: of Khyber Pakhtunkhwa & others**
- 2. Director Elementary & Secondary Education KPK Peshawar**
- 3. District Education Officer Kohistan.**

RESPONDENTS

PARAWISE COMMENTS OF BEHALF OF RESPONDENT NO.1,2 AND 3.

Respectfully Sheweach,

Preliminary Objections.

1. That he Appellant has neither got a cause of action nor locus standi to file the instant Appeal
2. That the Tribunal has no jurisdiction to adjudicate the matter.
3. That the Appellant has concealed the material facts from this Honorable Tribunal.
4. That the appellant has been stopped by her own conduct to file the appeal.
5. That the appellant has been come to the tribunal with unclean hands.

ON FACTS.

1. No comments.
2. Para No.2 is correct to the extent that petitioner was appointed as untrained middle passed teacher in BPS-04 purely on contract basis for the period of three years as stopgap arrangement, but neither her service was extended nor regularized through a proper procedure.

(Copy of the appointment order is annexed as Annexure "A")

3. Reply of Para 3 is that, As per Appointment order she was appointed at GGPS SadarkotKolai, not in GGPS Mahreen.

(Copy of the appointment order is annexed as Annexure "A")

4. Para No. 4 is incorrect, further stated that all the appointments that subject to proof.
5. Para No. 5 is incorrect, as per report of ASDEO/SDEO/ IMU she was found absent from her school duty. The GGPS Khizar Abad was reported closed by Independent Monitoring Unit during its visit on 10/08/2015 & 9/9/2015. The copy of the attached attendance register with the service appeal is fake, bogus.

(Copy of the absent report is annexed as Annexure "B")

6. Para No. 6 is incorrect, that the pay of the appellant has been stopped on her willful absence from her school duty and also due to non-availability of position code for the post of BPS-04 in the PST cadre accordingly her pay was automatically stopped. In this regard Writ Petition No. 978-A/2017 is already been pending before the Honorable Peshawar High Court Abbottabad, Bench.
7. Para No. 7 is incorrect, Respondent No. 3 treated the appellant as per rule and law.
8. Para No. 8 is incorrect; she was terminated due to her willful long absence after observing all the codal formalities. Show cause notice was issued on home address of the appellant but she neither replied to the show cause notice nor appeared before the inquiry officer. Finally the appellant was directed through newspaper to appear before the competent authority for personal hearing and to rebut the allegation of absence, but the appellant neither replied to the newspaper nor appeared before the competent authority for personal hearing, therefore she was removed from service. Appellant was fully aware of her service terms and condition.

(Copy of the show cause , final show cause published in daily Newspaper & termination order is annexed as Annexure "C", "D" & "E")

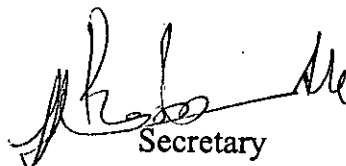
9. Para No. 9 is incorrect; no appeal was filed by the appellant. She failed to file appeal as per rule and law.

The instant service appeal may be dismissed on the following grounds.

GROUND.

- a. Incorrect and denied, she was terminated due to her willful long absence after observing all the codal formalities, her absence reported by ASDEO Circle, SDEO and Independent Monitoring Unit. The respondent treated the case as per law and rules and Policy.
- b. Incorrect and denied, she was reported absent by ASDEO Circle, SDEO and Independent Monitoring Unit.
- c. Incorrect and denied, all the codal formalities were observed before her termination.
- d. Incorrect and denied, as per ground Para No.c
- e. Incorrect and denied, the respondent acted as per law, rules and relevant Policy.
- f. Incorrect and denied, the respondent acted as per law and rules

In view of the above made submissions, this Honorable Tribunal may very graciously be requested to dismiss the instant appeal in favor of the Respondents in the interest of equity and justice.



Secretary

Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education
Peshawar.

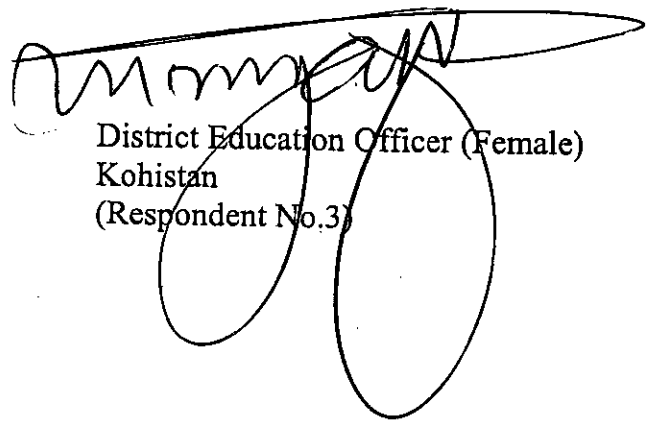
(Respondent No.1)



Director

Elementary & Secondary Education
Peshawar.

(Respondent No.2)



District Education Officer (Female)
Kohistan
(Respondent No.3)

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.

Service Appeal No. 1398/2018

Bas Pari

Appellant.

Versus.

Govt: of KPK etc:

Respondent

AFFIDAVIT

I, Mr. Muhammad Siddique, ADEO (litigation) Kohistan do hereby solemnly affirm and declare that the contents of the accompanying para wise comments are true and correct to the best of my knowledge and belief.


DEPONENT

5

ANNEXURE

A

23

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY KOHISTAN AT DASSU.

APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee the competent authority has been pleased to appoint the following (Female) Middle Passed candidates of Tehsil Palas, Paltan & Dassu-fresh (Union Council wise) against the vacant Posts of PTC in BPS-04 (Rs.2346-100-8346) on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

Table with columns: S.No, Name of candidate, Father's Name, Residence/ U/C, Appnt. RA, School where posted, Remarks. Contains 32 rows of candidate data.

CONDITIONS:-

- 1 Their appointments are purely on temporary basis and liable to termination at any time / stage with out assigning any reason/notice.
2 Their Certificates/ Domicile Certificates if not verified earlier, should be verified by the DDO (F) to Mr. Abdur Rahman I/C Dy: D.O (F) S&L Kohistan before handing over their charge.
3 Charge reports should be submitted to all concerned.
4 No TA/DA is allowed to any one.
5 They will be governed by such rules and regulations enforced and as proscribed by the Government from time to time for the category of the Government Servants to which they belong.
6 In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
7 They should not be allowed to take over charge if their age is less than 18-years and above 35-years
8 They should produce age and health certificate from EDO Health Kohistan before taking of charge.

(Zahir Bijah)
District Coordination Officer
Kohistan at Dassu

Encl: No. 856-96/ App/PTC (F) U/C wise Merit 12000. Dated Kohistan the 25-10-2005.

- Copy of the above is forwarded to:-
1 Director Schools & Literacy NWFP Peshawar.
2 P/B to Minister of Education NWFP Peshawar.
3 P/B to Secretary Government of NWFP (D & L) Department Peshawar.
4 Executive District Officer Schools & Literacy Kohistan.
5 District Accounts Officer Kohistan.
6 District Officer Schools & Literacy Kohistan.
7 Deputy District Officer (F) S&L Kohistan.
8 Candidates concerned.

(Malik Abdur Rashid)
Executive District Officer
Schools & Literacy Kohistan.

Annexure B

16

7

36

OFFICE OF THE ASSISTANT DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION (F) GIRDLE PALAS, KOTHIKOTI
Inspection Report:

Time of Visit with Date	Name of School	U/C	Name of the Teachers + Position + Status	Enrollment Class Wise								H / P	Status of the school	PTC Fund Position	Short comings/Suggestion /Recommendations /Action Taken/Remarks
				K a	P a	1 st	2 nd	3 rd	4 th	5 th	Total				
08/09/2014	G.G.P.S. Hujar Abad													All these schools were found closed. Teachers are not performing their duties so strict disciplinary action should be taken against their absentee.	
08/09/2014	G.G.P.S. Khizon Abad													All these schools were found closed. Teachers are not performing their duties so strict disciplinary action should be taken against their absentee.	
08/09/2014	G.G.P.S. Muzawan Abad													All these schools were found closed. Teachers are not performing their duties so strict disciplinary action should be taken against their absentee.	
														All these schools were found closed. Teachers are not performing their duties so strict disciplinary action should be taken against their absentee.	

Schools were found closed

[Signature]
Assistant Superintendent
Education
Girdle Palas, Kothi Koti

15/9/2014

SHOW CAUSE NOTICE

I, Khan Muhammad District Education Officer Female Kohistan, as competent authority under the Khyber Pakhtunkhwa Govt; Servants (Efficiency & Discipline) Rules 2011, do hereby serve you Mrs. Bas Pari PST Adps Rhizor Abad as follows.

- i. That on eve of IMU visit to your school, you remain absent from duty on 25-5-2016 without any information your School was found closed.
- ii. I am satisfied that you are guilty of misconduct and in efficiency as specified in rule 3 of the said rules. Thus you have rendered yourself liable to be proceeded against under the said rules.

In exercise of the powers conferred by the Khyber Pakhtunkhwa Govt. servants (Efficiency & Discipline) Rules 2011, the competent authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice with the direction to submit your defence in written within 07 (seven) days of the receipt of this notice as to why one of the major or minor penalty under rule-4 of the said rules should not be imposed upon you. You are further directed, whether you desired to be heard in person or not.

In case you failed to submit your reply within the stipulated period and not presented yourself for personal hearing it will be presumed that you have no defence to offer and an ex-parte decision will be taken against you.

To,

Mrs. Bas Pari PST Adps Rhizor AbadDistrict Education Officer
(female) Kohistan.E/No, IMU/Estt., 3292-3300/DEO (F) KH: Dated the 6/6/2016,

Copy of the above is forwarded to:

1. The Deputy Commissioner Kohistan.
2. The PA to the Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
3. The District Accounts Officer, Kohistan.
4. The DMO (IMU) District Kohistan.
5. The Deputy District Education Officer (F) Kohistan.
6. Official Concerned.
7. Office record.

District Education Officer
(female) Kohistan.

Annexure "E"

9

OFFICE OF THE DISTRICT EDUCATION OFFICER, (F) KOHISTAN.

P.O. No. 0998407225

Notification:

WHEREAS reported absent by ASDEO/SDEO/IMU, whereas show cause notices were served on Home addresses available in this office through registered post and where as neither joined duties nor submitted convincing replies.

WHEREAS final show cause notice was served in the DAILY NEWS PAPER Shomal Abhotabad on 17/9/2016 in which directed to submit replies for long will full absence from duty but neither attended the schools nor submitted convincing replies to the under signed.

Hence being the Competent Authority imposed the major penalty of removal from service under E & D Rules 2011 section 4) with effect from date mentioned against the name of teachers and recovery of pay for the absence period may be made.

S.No	Name of teachers with School	Terminated w.e.f.
1	Bibi Anina PST GGPS Kuz Saprona	23-4-2016
2	Mentiona PST GGPS Bankad Villag	20-3-2016
3	Shahen PST GGPS Dhok BZ	21-5-2016
4	Ruby Bibi PST GGPS Dhok BZ	21-5-2016
5	Nazmeen PST GGPS Dhok Gal Jijal	23-4-2016
6	Kahmat Bibi PST GGPS Kuz Saprona	23-4-2016
7	Mohiaz Begum PST GGPS Sultan Abad	10-3-2016
8	Lubna Janan PST GGPS Sultan Abad	18-5-2016
9	Gul badan Shah PST GGPS Dannat	21-5-2016
10	Kansir Bibi PST GGPS Shomal Mujawar Abad ✓	25-5-2016
11	Gul Nasreen PST GGPS Khizar Abad ✓	25-5-2016
12	Bas Pari PST GGPS Khizar Abad ✓	25-5-2016

- Pass

District Education Officer
(Female) Kohistan
IX

No. 432831 / DEO(F)KH Dated: 23-12-2017

Copy of the above is forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
2. The Deputy Commissioner, Kohistan upper, Lower and Kolai Pallas.
3. The District Monitoring Officer (IMU) District Kohistan.
4. The District Accounts Officer, Kohistan.
5. The Sub Divisional Education Officer (F) Dasso, Pattan and Pallas Kohistan with the request to ensure the cover of absent period pay from the Teacher concerned if already paid.
6. The ASDEOs circle.
7. Teachers concerned.

(23/12/17)
District Education Officer
(Female) Kohistan
IX