

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1182/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/07/2022	<p>The appeal of Mst Waseema Jabeen Bibi presented today by Mr. Muhammad Riaz Swati Advocate. It is fixed for preliminary hearing before touring Single Bench at Abbottabad on . Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;">REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNEL, PESHAWAR

SERVICE APPEAL NO. 1182 /2022

Waseema Jabeen Bibi, Primary School Teacher (PST) Government Girls
Community Model School Jijal Circle Dubair, Kohistan Lower.

APPELLANT

3. DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER
4. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA, PESHAWAR

RESPONDENTS

RESPONDENTS

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Appellant *Waseema Jabeen*
Waseema Jabeen Bibi
PST

Dated: 22/07 /2022

Muhammad Riaz Swati
Muhammad Riaz Swati
Advocate. Marishehra

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

SERVICE APPEAL NO. _____/2022

WASEEMA JABEEN BIBI, PRIMARY SCHOOL TEACHER (PST)
GOVERNMENT GIRLS COMMUNITY MODEL SCHOOL JIJAL
CIRCLE DUBAIR, KOHISTAN LOWER,

(APPELLANT)

VERSUS

1. DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER
2. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA, PESHAWAR

(RESPONDENTS)

SERVICE APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNEL ACT, 1974, AGAINST THE IMPUNGED ORDER ISSUED VIDE FILE NO: 1467-73 DATED 25/03/2022 BY THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER, WHEREBY MAJOR PENALTY OF *COMPULSORY RETIREMENT* FROM SERVICE WAS IMPOSED UPON THE APPELLANT IS ARBITRARY, ULTRA VIRES, MALA FIDE IN LAW AND FACTS, WITHOUT LAWFUL AUTHORITY AND WITHOUT DUE PROCESS, IN UTTER VIOLATION OF KHYBER PAKHTUNKHWA GOVT: SERVANT E&D RULES 2011, IN A HIGHLY WHIMSICAL AND CAPRICIOUS MANNER. THE SAME MAY PLEASE BE SET ASIDE DECLARING IT AS ILLEGAL, NULL AND VOID, VOID AB-INITIO AND INEFFECTIVE UPON THE RIGHTS OF THE APPELLANT.

Respectfully Sheweth;

FACTS:

- 1) That the appellant was serving as a Primary School Teacher in District Kohistan since 09/02/2012, presently posted as PST GGCMS Jijal Circle Dubair, Kohistan Lower. The District Education Officer (Female) Imposed Major Penalty of compulsory retirement upon the appellant vide No. 1467-73 Dated 25/03/2022 under the charge of wilful absence from duty. **Copy of impugned order dated 25/03/2022 and its better copy are attached and marked as Annex "A&A1"**
- 2) That, impugned order of compulsory retirement from service was passed without due process of law and in result of capricious / colorful exercise of power on the part of respondent No.1, as no show cause notice was served, delivered/received by the appellant nor any such reply was made by the appellant as mentioned in impugned order, and further letter for granting Personal Hearing was also not communicated to appellant.

- 3) That, after receiving the impugned compulsory retirement order through WhatsApp, the appellant approached to the District Education Officer (Female) Kohistan Lower (Respondent No.1) for provision of requisite documents i.e (i) Show cause notice dated 24-02-2022 (ii) Letter for personal hearing dated 15-03-2022 and copy of fake reply on the part of appellant dated 08-03-2022 through registered Post dated 28/03/2022, but no response is received till now. **Copy of request dated 28/03/2022 along with receipt is attached and marked as Annex "B-B1" respectively**
- 4) That respondent No.1 District Education Officer (Female) Kohistan Lower passed the impugned order under the **charge of wilful absence**, without giving the detail of absent period on the basis of which the appellant is being penalized with such a harsh punishment / major penalty of compulsory retirement.
- 5) That the respondent No.1, District Education Officer (Female) has passed the impugned order mentioning previous absentees of appellant dated 15/04/2019, 05-09-2019, 22-01-2020, 01-02-2020 (4 days within 2 year) for which appellant had already been penalized as per admission of respondent No.1.
- 6) That, the appellant preferred a departmental appeal dated 15-04-2022 to respondent No.2 against impugned order, requesting that respondent No.1 had kept secret, the entire proceeding and no opportunity of defence was given to the appellant, thus appellant condemned unheard and the compulsory retirement order was passed in hit-and-run having, no legal sanctity may please be quashed and set aside. **Copy of departmental appeal and Postal receipt is attached and marked as Annex "C-C1"**
- 7) That, statutory period of 90 days has elapsed from the date of preferring the departmental appeal but no reply has so far been conveyed to the appellant.
- 8) That, feeling aggrieved and finding no other remedy, the appellant is constrained to approach this Honourable tribunal for redressal of her grievances, respectfully mention that the impugned order of compulsory retirement from service dated order 25-03-2022 is arbitrary, ultra-verse and the appellant may please be reinstated in service with all back benefits w.e.f 25-03-2022, in rem alia on the following grounds.

GROUND:-

- A. That, appellant has been serving as a PST since 09-12-2012 having unblemished service record. Khyber Pakhtunkhwa civil servant Act 1973 provide that a civil servant shall be liable prescribed disciplinary action and penalties in accordance with the prescribed procedure but impugned order is the result of sheer violation of prescribed procedure.
- B. That, impugned order compulsory retirement from service was passed in ultra-violation of Khyber Pakhtunkhwa E&D Rules 2011, as no show

cause notice was served, delivered/received by the appellant nor any such reply was made on the part of appellant as mentioned in impugned order and further letter for granting Personal Hearing was also not communicated to appellant.

- C. That, appellant was not provided any opportunity of defence and entire proceeding was kept secret. Thus the appellant deprived from right to fair trial as provided in article 10-A of the constitution of Islamic Republic of Pakistan 1973.
- D. That, all the proceeding was against the well settled principle of nature justice, enshrined in the maxim Audi alteram partem. And the appellant was condemned unheard.
- E. That, appellant was compulsory retired from service on her previous (4 days within 2 years) absentees i.e dated 15/04/2019, 05-09-2019, 22-01-2020, 01-02-2020 for which she had already been penalized. Hence no civil servant could be penalized or punished twice for the same charge.
- F. That, in response to the observation of Registrar Services Tribunal Khyber Pakhtunkhwa Peshawar vide No.2126/ST dated 30/06/2022, resubmitted after doing the needful. **Copy of observation letter is attached and marked as Annex "D"**

Prayer:

It is therefore humbly prayed that on acceptance of instant appeal with cost, this Honourable Tribunal may please set aside the impugned compulsory retirement from service order dated 25-03-2022 passed by respondent No.1, declaring the same ultra verse, illegal, void ab-initio, without lawful authority and in effect upon the rights of appellant. Appellant may kindly be re-instated in service from the date of her compulsory retirement i.e 25-03-2022 with all back benefits in the interest of justice and equity.

Waseema Jabeen

Waseema Jabeen Bibi
PST, GGCMS JIJAL
CIRCLE DUBAIR, KOHISTAN
LOWER,
Through
Muhammad Riaz Swan Advocate
Mansehra

Dated: 22/07 /2022

Verification

It is verified that, the contents of the foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this honorable Tribunal.

Waseema Jabeen

Waseema Jabeen Bibi
PST, GGCMS JIJAL

Dated: 22/07 /2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNEL, PESHAWAR

SERVICE APPEAL NO. _____/2022

WASEEMA JABEEN BIBI, PRIMARY SCHOOL TEACHER (PST)
GOVERNMENT GIRLS COMMUNITY MODEL SCHOOL JIJAL CIRCLE
DUBAIR, KOHISTAN LOWER.

(APPELLANT)

VERSUS

1. DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER
2. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR

(RESPONDENTS)

AFFIDAVIT

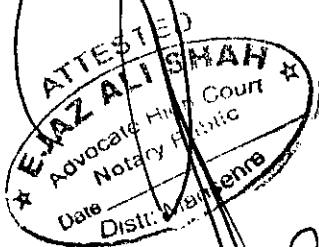
I, Waseema Jabeen Bibi, Primary School Teacher (PST) Government Girls Community Model School Jijal Circle Dubair, Kohistan Lower do hereby solemnly affirm and declare on oath that, contents of the accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

It is also verified on oath on this day 22nd of July, 2022 That, contents of above affidavit are true and correct to the best of my knowledge, information and belief.

waseema jabeen
Deponent

Dated: 22/07 /2022**IDENTIFIED BY:**

Muhammad Riaz Swati
Advocate, Mansehra



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNEL, PESHAWAR

SERVICE APPEAL NO. _____/2022

WASEEMA JABEEN BIBI, PRIMARY SCHOOL TEACHER (PST)
GOVERNMENT GIRLS COMMUNITY MODEL SCHOOL JIJAL
CIRCLE DUBAIR, KOHISTAN LOWER.

(APPELLANT)

VERSUS

1. DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER
2. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR

SERVICE APPEAL**CORRECT ADDRESSES OF THE PARTIES**

Respectfully Sheweth

Correct addresses of the parties are as under:

Waseema Jabeen Bibi, Primary School Teacher (PST) Government Girls
Community Model School Jijal Circle Dubair, Kohistan Lower.
PERMANENT ADDRESS: C/O M. SARAH H.NO.1221 OLD COLLEGE
ROAD, NEAR GHS NO.3 MUFTIABAD MANSEHRA

APPELLANT

1. DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER
2. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER PAKHTUNKHWA, PESHAWAR

RESPONDENTSDated: 22/07/2022*Waseema Jabeen*

Waseema Jabeen Bibi PST,
GGCMS JIJAL
CIRCLE DUBAIR
KOHISTAN Lower
Through

Muhammad Riaz Swati
Advocate Mansehra



Government of Khyber Pakhtunkhwa
Office of the District Education Officer, Female
LOWER KOHISTAN

Annex Page-6
"A"

File No: 1474-79
23/3/2022

Notification for Major Penalty of Compulsory Retirement

1. Whereas, (Waseema jabeen bibi, PST, GGCMS JIJAL(EmisCode:30525)) was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges of willful absence from duty.
2. And whereas, a show cause notice was served upon him/her vide No/1266-73 dated 24.2.2022 for willful absence from duty within the meaning of Rule-3 (d) and Rule-4 (b) (ii).
3. And whereas, he/she had also been reported absent previously on 15/04/2019, 05/09/2019, 22.01/2020 and 01.02/2020 for which you had already been penalized
4. And whereas, the Competent Authority after having considered the charges, evidence on record, his track record pertaining to his willful absence on various occasions, his/her reply dated 08.3.2022 and the personal hearing granted to him/her vide No. 1400 dated 15.3.2022 of the view that the charges mentioned in the show cause have been proved against (Waseema jabeen bibi, PST, GGCMS JIJAL(EmisCode:30525)).
5. Now, therefore, in exercise of the powers conferred under Rule-14 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 the Competent Authority is pleased to impose the major penalty of Compulsory Retirement from service upon (Waseema jabeen bibi, PST, GGCMS JIJAL(EmisCode:30525)) as mentioned in Rule 4 (b) (ii) of the ibid rules with immediate effect.

DEO Kohistan/Lower Female

District Education
Officer
Lower
Kohistan

Endst: Even No. & Date

Copy of the above is forwarded to the: -

- i. Director, Elementary & Secondary Education Department, G T Road, Peshawar
- ii. Deputy Commissioner concerned
- iii. District Monitoring Officer concerned
- iv. Principal/Headmaster/Headmistress/DDEO/SDEO concerned for necessary action under intimation to this office within 7 days.
- v. Waseema jabeen bibi, PST, GGCMS JIJAL(EmisCode:30525), JIJAL, PATTAN, LOWER KOHISTAN
- vi. Master File

By - Notification for Major Penalty

DEO Kohistan/Lower Female
District Education
Officer
Lower
Kohistan

True copy
was eema jabeen
25/03/2022

BETTER COPY of Annexure "A" (impugned order)

Government Khyber Pakhtunkhwa
Office of the District Education Officer, Female
LOWER KOHISTAN

File No:1474-79
25/03/2022

Annex
(A-1)
P-7

Notification for Major Penalty of Compulsory Retirement

1. Whereas, (Waseema Jabeen Bibi, PST, GGCMS JIJAL (EMIS Code : 30525) was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges of willful absence from duty.
2. And whereas, a show cause notice was served upon him/her vide No.1266-73 dated 24-2-2022 for willful absence from duty within the meaning of Rule-3 (d) and Rule-4 (b) (ii).
3. And whereas, he/she had also been reported absent previously on 15-04-2019,05/09/2019,22-01/2020 and 01-02-2020 for which you had already been penalized.
4. And whereas, the Competent Authority after having considered the charges, evidence on record, his track record pertaining to his willful absence on various occasions, his/her reply dated 08-03-2022 and the personal hearing granted to him/her vide No.1400 dated 15-03-2022 is of the view that the charges mentioned in the show cause have been proved against (Waseema Jabeen Bibi) PST, GGCMS JIJAL (EMIS Code:30525).
5. Now, therefore, in exercise of the powers conferred under Rule-14 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 the Competent Authority is pleased to impose the major penalty of **Compulsory Retirement** from service upon (Waseema Jabeen Bibi) PST, GGCMS JIJAL (EMIS Code:30525) as mentioned in Rule-4 (b) (ii) of the ibid Rules with immediate effect.

DEO Kohistan Female
Kohistan Lower

Endst: Even No & Date

Copy of the above is forwarded to the:-

1. Director Elementary & Secondary Education Department, GT Road, Peshawar
2. Deputy Commissioner Concerned
3. District Monitoring Officer concerned
4. Principal /Headmaster/Headmistress/DDO/SDEO concerned for necessary action under intimation to this office within 7 days
5. Waseema Jabeen Bibi, PST, GGCMS JIJAL (EMIS Code:30525) JIJAL, PATTAN LOWER KOHISTAN
6. Master File

By-Notification for Major Penalty

True Copy.
Waseema Jabeen

Annex — "B"

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To.

The District Education Officer

(F) Lower Kohistan.

Subject: MAJOR PENALTY OF COMPULSORY RETIREMENT WITHOUT DUE PROCESS OF LAW & SERVICE OF REQUISITE COMMUNICATIONS i.e
i. SHOW CAUSE NOTICE DATED 24/02/2022, ii. OPPORTUNITY OF PERSONAL HEARING THROUGH LETTER NO.1400 DATED 15/03/2022
iii. AND COPY OF FAKE REPLY ON THE PART OF APPLICANT DATED 08/03/2022.

R/Madam,

It is stated that your honour imposed Major penalty of Compulsory retirement against the applicant vide your office No.1474-79 dated 25/03/2022, received through WhatsApp Message from Mehnaz ASDEO (F) Circle Dubair, Cell #0340-1414191, without due process of law and service of requisite notices mentioned in above noted Notification of compulsory retirement.

Hence, you are therefore, requested to kindly provide copies of the following documents to enable me to approach the Appellant Authority against such a whimsical and capricious orders issued without lawful authority /colorable exercise of power.

1. Copy of Show Cause Notice issued vide your office No.1266-73 dated 24/02/2022 and its token of acknowledgment to whom the said letter was delivered.
2. Copy of fake reply on the part of undersigned dated 08/03/2022, in pursuance to the Show cause notice which was not delivered to me. copy of fake / concocted reply dated 08-03-2022 is required.
3. Copy of letter issued vide your office No.1400 dated 15/03/2022 for granting opportunity of personal hearing.

Your Obediently.

Waseema
Jabeen

Waseema Jabeen Bibi
PST, GGCMS JIJAL
CODE No.30525

Circle Dubair, Pattan, Kohistan.

Permanent Address: C/ O M. Saraj H.No.1221,
old college road, near GHS No.3 Muftiabad Manshara
Cell# 0310-5601650

Date 28//03/2022

Copy of above for information & similar request to the:-

1. Director, Elementary & Secondary Education Peshawar
- ✓ 2. Sub Divl: Edu: Officer (F) Pattan, Kohistan.
3. Assit:Sub Divl: Edn: Officer (F) Circle Dubair, Kohistan.

Applicant

Waseema Jabeen Bibi
PST, GGCMS JIJAL

True copy
Waseema Jabeen

28/3/2022

9:37

Mansehra GPO

RGL81584105

20

P-9
Annex
"B-1"

M SIR,
OLD COLLEG ROAD
Mansehra
00000000000

DISTRICT EDUCATION OFFICER
FEMALE PATTAN
Kohistan
00000000000

RGL81584105
RGL81584105

True copy
waseema Jabeen



50
tariq.mos
FTN: 9010405

To

The Director
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

Annex
"C"

P-10

Subject: DEPARTMENTAL APPEAL AGAINST IMPUGNED OFFICE ORDER ISSUED VIDE FILE NO: 1467-73 DATED 25/03/2022 BY THE DISTRICT EDUCATION OFFICER FEMALE LOWER KOHISTAN, WHEREBY MAJOR PENALTY OF *COMPULSORY RETIREMENT* FROM SERVICE WAS IMPOSED UPON THE APPELLANT IN A HIGHLY CAPRICIOUS MANNER, ULTRA VIRES, WITHOUT LAWFUL AUTHORITY, IN UTTER VIOLATION OF KHYBER PAKHTUNKHWA GOVT: SERVANT E&D RULES 2011 AND EVEN AGAINST THE PROCEDURE LAID DOWN AND NOTIFIED FOR NEW ONLINE ACTION MANAGEMENT SYSTEM BY DIRECTOR E&SE DEPARTMENT KHYBER PAKHTUNKHWA VIDE ENDST NO: 9970-8031 DATED 08-07-2021.

Respect Sir,

I would like to invite your kind attention regarding impugned compulsory retirement notification passed in hit-and-run, in violation of E&D Rules 2011 as well as guidelines circulated by the office of the Director E&SE Vide NO: 9970-8031 Dated 08/07/2021 with the following submissions:-

- 1) That the appellant has been serving as a Primary School Teacher in District Kohistan since 09/12/2012, presently posted as PST GGCMS Jijal Circle Dubair, Pattan, Lower Kohistan. The District Education Officer Female Imposed Major Penalty of compulsory retirement against the undersigned vide No. 1467-73 Dated 25/03/2022 under the charge of wilful absence from duty. **Copy of impugned order dated 25/03/2022 attached and marked as Annex A**
- 2) The impugned order of compulsory retirement was passed without due process, as no show cause notice was delivered/received by undersigned nor any such reply was made on the part of undersigned as mentioned in impugned order, and further letter for granting Personal Hearing was also not communicated to undersigned.
- 3) That after receiving the compulsory retirement order through WhatsApp, the appellant approached to the District Education Officer Female Lower Kohistan for provision of requisite documents through registered post dated 28/03/2022, with a copy to your office and all others concerned, but no response is received till now. **Copy of request dated 28/03/2022 is attached and marked as Annex B**
- 4) That District Education Officer Lower Kohistan passed the impugned order under the charge of wilful absence without giving the detail of absent period on the basis of which the appellant is being penalized with such a harsh punishment.

True copies
was seen by Jabeen

- C. (P-11)
- 5) That the District Education Officer Female has passed the impugned order mentioning previous absentee of appellant dated 15/04/2019, 29/09/2020, 09/02/2021, 18/03/2021 against the guidelines issued by the Administrative Secretary for which the appellant had already been penalized.

It is further added that online Action Management System notified vide Endst No: 9770-8031 Dated 08/07/2021, provides that "For Each Academic Year, Teacher Absenteeism Will Start from the First Occurrence". Thus the absent period of previous academic years mentioned in the impugned order 15/04/2019, 29/09/2020, 09/02/2021, 18/03/2021 are not countable towards the present proceedings. Copy of notification dated 08/07/2021 attached and marked as Annex C

Prayer:

It is stated in your honor that no SHOW CAUSE NOTICE was received or delivered to the appellant, reply of show cause notice dated 08/03/2022 on the part of appellant is also fake and concocted even the District Education Officer Female Lower Kohistan failed to mention absent period for which the appellant was proceeded. However, the order was passed in result of the absentees dated 15/04/2019, 29/09/2020, 09/02/2021, 18/03/2021 that were not countable towards the fresh proceedings as appellant has already been penalized.

The District Education Officer Female kept secret the entire proceedings and no opportunity of defense was given to the appellant and the appellant was condemned unheard. The impugned compulsory retirement order was passed in hit-and-run having, no legal sanctity, malafide, ultra-verse, the same may please be quashed and set aside, allowing the appellant to continue her services with all back benefits from the date of impugned notification dated 25/03/2022.

Yours obediently,

waseema jabeen

Waseems Jabeen Bibi
PST, GGCMS IIJAL
CODE No.30525

CIRCLE DUBAIR, PATTAN KOHISTAN,
PERMANENT ADDRESS: C/O M. SIRAJ H.NO.1221
OLD COLLEGE ROAD, NEAR GHS NO.3 MUFTIABAD MANSEIRA.
Cell# 0310-5601650

Dated: 14/04/2022

True copy
waseema jabeen

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Annex
"C-1"

No. 1125 For Insurance see reverse.
Stamps affixed ex. in case of
uninsured letters of more than
the initial weight prescribed in the
Post Office Guide or on which
acknowledgement is due.

Received a registered letter addressed to Direct Secy Date 15/5/59

Initials of Receiving Office CL Write here "letter", "postcard", "booklet" or "package" with the word "insured" before when necessary.

Insured for Rs. (in figures) 1000 (in words) one thousand

Insurance fee Rs. 0 Ps. 0 (in words) Nil Weight 100 Grams 100 Kilo 0

Name and address of sender F. S. Hussain

Post Office Stamp: RA G.P.O.

Handwritten notes: "Annex C-1", "True copy", "waseema jabeen", "Insured" (written vertically on the left), and "5-1-59" at the bottom.

P-13

Annex
"D"

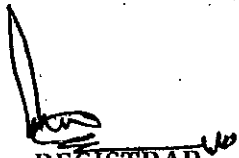
This is an appeal filed by Mst. Waseema Jabeen Bibi today on 29/06/2022 against the order 25/03/2022 against which She preferred/made departmental appeal/representation on 14.04.2022 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

1- Annexure-A of the appeal is illegible which may be replaced by legible/better one.

No. 2126/ST,

Dt. 30/6 /2022.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Riaz Swati Adv.
High Court Mansehra

8-14

BEFORE THE KYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2022

Waseema Jabeen Bibi, Primary School Teacher (PST) Government Girls
Community Model School Jijal Circle Dubair, Kohistan Lower.

APPELLANT

5. DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN LOWER
6. DIRECTOR ELEMENTARY & SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA, PESHAWAR

RESPONDENTS

I/We Waseema Jabeen Bibi, Primary School Teacher (Pst) Government
Girls Community Model School Jijal Circle Dubair, Kohistan Lower. do
hereby appoint and constitute **MUHAMMAD RIAZ SWATI**
ADVOCATE, MANSEHRA to appear, plead, act compromise,
withdraw or refer to arbitration for me/us as my/our counsel/advocate
in the above noted matter, without any liability for his default and with
the authority to engage/appoint any other advocate to deposit,
withdraw and receive on my/our behalf all sums and amounts
payable or deposited on my/our account in the above noted matter.

Dated 22/07/2022

CLIENT

ACCEPTED

MUHAMMAD RIAZ SWATI

MANSEHRA

Waseema Jabeen

