

18.07.2018

Counsel for the appellant and Assistant AG for respondents present. Counsel for the appellant requested for withdrawal of the instant appeal. In this respect his signature also obtained in the margin of the order sheet. Request accepted and the appeal in hand is therefore, dismissed as withdrawn. File be consigned to the record room.

Announced:  
18.07.2018

(Ahmad Hassan)  
Member

(Muhammad Hamid Mughal)  
Member

27.12.2017

Counsel for the appellant present. Mr. Muhammad Jan, DDA for the respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come for arguments on 28.02.2018 before the D.B.


  
Member

  
Chairman

28.02.2018

Counsel for the appellant present. Mr. Ziaullah, DDA for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 03.05.2018 before the D.B.

  
Member (Executive)

  
Member (Judicial)

03.05.2018

Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for same on 18.07.2018 before D.B

  
Reader

04.10.2017

Counsel for the petitioner present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Arguments on application for restoration of appeal heard. Record perused.

Learned counsel for the petitioner contended that the service appeal was fixed for regular hearing on 01.08.2017 but on the said date counsel for the petitioner was serious ill therefore, she could not attend the court and due to her absence this service appeal was dismissed in default on 01.08.2017. It was further contended that the petitioner after coming to know about the dismissal of appeal immediately filed the application for restoration of appeal on 18.08.2017 therefore, it was prayed that the appeal may be restored.

On the other hand learned Additional Advocate General ~~Mr. Kabirullah Khattak~~ opposed the contention of learned counsel for the petitioner and the contended that the application for restoration of service appeal is time barred for two days therefore, requested for dismissal of application for restoration of appeal.

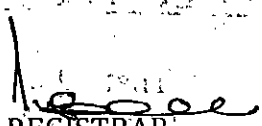

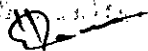
Record reveals that the service appeal was dismissed due to non-prosecution on 01.08.2017 and the learned counsel for the petitioner submitted application for restoration of appeal on 18.08.2017 as the learned counsel for the petitioner was serious ill and could not attend the court due to illness and after coming to know about the dismissal of appeal she immediately filed restoration application. It is also well settled law that the case is to be decided on merit and not on technicalities. Therefore, keeping in view the arguments advanced on both sides I accept the application for restoration of appeal and restored the present service appeal. To come up for arguments on 27.12.2017 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

**Form-A**  
**FORM OF ORDERSHEET**

Court of \_\_\_\_\_

Appeal's Restoration Application No.150/2017

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	18.08.2017	<p>The application for restoration of appeal No: 413/2014 submitted by Mst. Musarrat Parveen through Mr. Uzma Syed Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p align="right"> REGISTRAR</p>
2	21-8-2017	<p>This restoration application is entrusted to S. Bench to be put up there on 12-9-2017.</p> <p align="right"> MEMBER</p>
	12.09.2017	<p>Petitioner absent: Notice be issued to petitioner and her counsel for attendance for 04.10.2017 before S.B. Record be also requisitioned for the date fixed.</p> <p align="right"> (Muhammad Hamid Mughal) Member</p>

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

*Restoration Application no. 150/2017*  
APPEAL NO.413/2014

Musarrat Parveen

V/S

Education Deptt:

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 684

Dated 18-8-2017

**APPLICATION FOR RESTORATION OF APPEAL NO.**  
**413/2014 WHICH WAS DISMISSED ON DEFAULT VIDE**  
**ORDER DATED 01.08.2017.**

**RESPECTFULLY SHEWETH:**

1. That the instant appeal No. 413/2014 was filed before this Honourable Tribunal against the order dated 12.12.2012 whereby the appellant was illegally premature transfer.
2. That the instant appeal was in Argument stage and on the date of hearing, the counsel for the appellant was ill and on bed rest, therefore the counsel for appellant could not appear before the Tribunal and only appellant was present in the Tribunal.
3. That the next date fixed in the instant appeal was fixed on dated 01.08.2017. The Counsel for the appellant did not appear in the Tribunal on 01.08.2017 due to serious illness and the instant appeal was dismissed on default on 01.08.2017. **(Copy of the order is attached)**
4. That it is in the interest of justice that the appeal should be dealt on merit rather to dismiss on default.

It is therefore, most humbly prayed, that the instant appeal No. 413/2014 may be restore on the acceptance of this application.

*مسررات پاروین*  
**APPELLANT**  
Musarrat PARveen

Through:

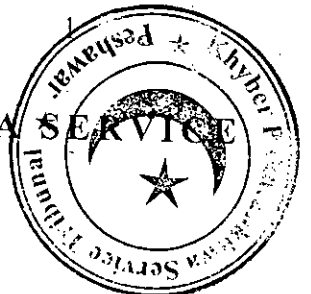
*UZMA SYED*  
**UZMA SYED**  
**ADVOCATE, HIGHCOURT**  
**PESHAWAR.**

**AFFIDAVIT**

It is affirmed and declared that the contents of application are true and correct to the best of my knowledge and belief.

*مسررات پاروین*  
**DEPONENT**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR



Service Appeal No. 413 /2014

~~446~~  
446  
24-3-2014

Mst: Musrat Parveen PSHT BPS-(15) Govt: Primary School, Banjekh Banda Tehsil Takh-e-Nasrati District Karak .....Appellant.

Versus

1. The Director of Education (E & SE), Govt: of Khyber Pakhtunkhwa, Dubghri Garden, Peshawar.
2. The District Educational Officer (Fe male), (E & SE) District Karak.....Respondents.

Service Appeal under section 4 of the Khyber Pakhtunkhwa, Service Tribunal Act, 1974 read with 10 of the Civil Servant Act, 1973 and read with Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfers , Lecturers, Instructors and Doctors) Regulatory Act, 2011 against the impugned order No.748-51 dated TN the 12-12-2012 of respondent No.2 and against which appellant filed departmental appeal, which is still pending without disposal.

Prayer:-

On acceptance of the instant service appeal this Honourable Tribunal may graciously be pleased to declare the impugned order as politically motivated, against Union Council Policy of the Govt; against posting transfer policy, illegal, unlawful, without lawful authority and set aside the same with direction to the respondents to allow the appellant to continue her duty at her

24/3/14

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar



Appeal No. 413/2014  
St. Musarat Parveen vs Govt

01.08.2017

None for the appellant present. Asst: AG for respondents present. Case called for several times but no one is present on behalf of the appellant. Consequently, the present appeal is dismissed in default. File be consigned to the record room.

Announced:  
01.08.2017

Certified to be true copy  
ENAMULLAH  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Self  
Culdeet Khan (M. Hameed Mughal)  
Member Member

Date of Presentation of Application: 18-8-17  
Number of Words: 800  
Copying Fee: 6-  
Urgent: 2-  
Total: 8-  
Name of Copyist: [Signature]  
Date of Completion of Copy: 18-8-17  
Date of Delivery of Copy: 18-8-17

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

*Restoration Application no. 150/2017*  
**PESHAWAR.**  
APPEAL NO.413/2014

Musarrat Parveen

V/S

Education Deptt:

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 684

Dated 18-8-2017

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It is therefore, most humbly prayed, that the instant appeal No. 413/2014 may be restore on the acceptance of this application.

Through:

*سید مہر*  
**APPELLANT**  
Musarrat PARveen

*Uzma Syed*  
**UZMA SYED**  
**ADVOCATE, HIGHCOURT**  
**PESHAWAR.**

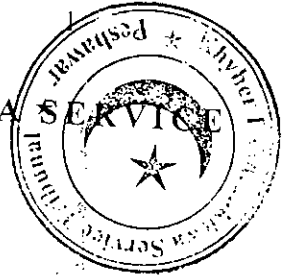
**AFFIDAVIT**

It is affirmed and declared that the contents of application are true and correct to the best of my knowledge and belief.

*سید مہر*  
**DEPONENT**



BEFORE THE KHYBER PAKHTUNKHWA  
TRIBUNAL, PESHAWAR



Service Appeal No. 413 /2014

446  
24-3-2014

Mst: Musrat Parveen PSHT BPS-(15) Govt: Primary School, Banjekh  
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ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

24/3/14

Yak



Appeal No. 413/2014  
St. Musarat Parveen vs Govt

01.08.2017

None for the appellant present. Asst: AG for respondents present. Case called for several times but no one is present on behalf of the appellant. Consequently, the present appeal is dismissed in default. File be consigned to the record room.

Announced:  
01.08.2017

Certified to be true copy  
E. AMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

self  
Chulzeet Khan (M. Hamid Mughal)  
Members

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

**PESHAWAR.**  
*Restoration Application NO. 150/2017*  
APPEAL NO. 413/2014

Musarrat Parveen

V/S

Education Deptt:

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 684

Dated 18-8-2017

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Through:

*مساررت پاروین*  
**APPELLANT**  
Musarrat PARveen

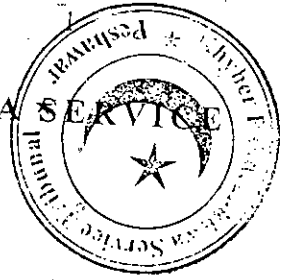
*Uzma Syed*  
**UZMA SYED**  
ADVOCATE, HIGH COURT  
PESHAWAR.

**AFFIDAVIT**

It is affirmed and declared that the contents of application are true and correct to the best of my knowledge and belief.

*Uzma Syed*  
**DEPONENT**

BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR



Service Appeal No. 413 /2014

446  
24-3-2014

Mst: Musrat Parveen PSHT BPS-(15) Govt: Primary School, Banjekh  
Banda Tehsil Takh-e-Nasrati District Karak .....Appellant.

Versus

1. The Director of Education (E & SE), Govt. of Khyber Pakhtunkhwa, Dubghri Garden, Peshawar.
2. The District Educational Officer (Female), (E & SE) District Karak..... Respondents.

Service Appeal under section 4 of the Khyber Pakhtunkhwa, Service Tribunal Act, 1974 read with 10 of the Civil Servant Act, 1973 and read with Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfers , Lecturers, Instructors and Doctors) Regulatory Act, 2011 against the impugned order No.748-51 dated TN the 12-12-2012 of respondent No.2 and against which appellant filed departmental appeal, which is still pending without disposal.

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ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

446



Appeal No. 413/2014  
St. Musarat Parveen vs Govt

01.08.2017

None for the appellant present. Asst: AG for respondents present. Case called for several times but no one is present on behalf of the appellant. Consequently, the present appeal is dismissed in default. File be consigned to the record room.

Announced:  
01.08.2017

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Service Tribunal,  
Peshawar

Self  
Culzeet Khan (M. Hameed Mughal)  
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Appeal No. 413/2014  
Mst. Musarat Parveen vs Govt

01.08.2017

None for the appellant present. Asst: AG for respondents present. Case called for several times but no one is present on behalf of the appellant. Consequently, the present appeal is dismissed in default. File be consigned to the record room.

Announced:

01.08.2017

(Gul Zeb Khan)  
Member

(Muhammad Hamid Mughal)  
Member

06.02.2017

Counsel for appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents present. Learned counsel for appellant seeks adjournment. Adjourned. To come up for arguments on 28.02.2017 before D.B.

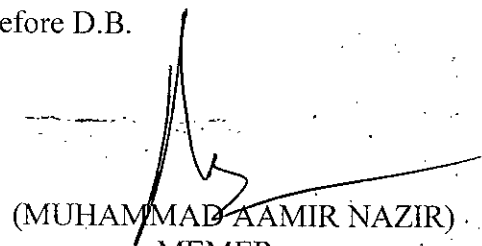
  
(ASHFAQUE TAJ)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

28.02.2017

Counsel for the appellant and Mr. Muhammad Jan, GP alongwith Mr. Hameed-Ur-Rehman, AD(Lit) for respondent No.1 present. Through instant appeal the appellant has challenged the transfer order dated 12.12.2012 vide which the appellant was transferred to GGPS Banjekhel Banda. Since the normal tenure of the appellant has already completed and she is entitled for further transfer, therefore, representative of respondent No.1 is directed to consult with the respondents for adjustment of the appellant in accordance with law and rules. To come up for arguments/further proceedings on 05.04.2017 before D.B.

  
(AHMAD HASSAN)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMER

05.04.2017

Counsel for the appellant and Mr. Muhammad Jan, GP for the respondents present. Argument could not be heard due to incomplete bench. To come up for final hearing on 01.08.2017 before D.B.

  
Chairman

16.03.2016

Counsel for the appellant and Mr. Hameed-ur-Rehman, AD (int.)  
alongwith Mr. Ziaullah, GP for respondents present. Rejoinder not  
submitted. Requested for further time. To come up for rejoinder and  
arguments on 31.5.16.

  
MEMBER

MEMBER

31.05.2016

Counsel for the appellant and Mr. Muhammad Owais, S.S  
alongwith Mr. Usman Ghani, Sr.GP for respondents present.  
Learned counsel for the appellant requested for adjournment.  
Adjourned for arguments to 19-10-16 before D.B.

  
MEMBER

  
MEMBER

19.10.2016

Counsel for the appellant and Mr. Ziaullah, GP for  
respondents present. Counsel for the appellant requested for  
adjournment. To come up for arguments on 6-2-17.

  
(ABDUL LATIF)  
MEMBER

  
(PIR BAKHSH SHAH)  
MEMBER



20.10.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Awais, S.S for the respondents present and requested for further time. To come up for written reply on 24.12.2014.



MEMBER

24.12.2014

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Awais, SS for the respondents present. The Tribunal is incomplete. To come up for the same on 27.2.2015.



READER

27.02.2015

None present for appellant. Mr. Muhammad Awais, S.S for respondents alongwith Addl: A.G present. Para-wise comments by respondents submitted. The case is assigned to D.B for rejoinder and final hearing for 21.9.2015



Chairman

21.09.2015

None present for appellant. Mr. Muhammad Awais, SS alongwith Mr. Muhammad Jan, GP for respondents present. Notice be issued to the appellant. To come up for rejoinder and arguments on 16-3-2016.



Member



Member

Appeal No. 413/2014  
Mst. Musrat Jabeen

3, 17.04.2014

Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 12.12.2013, he filed departmental appeal on 16.12.2013, which has not been responded within the statutory period of 90 days, hence the present appeal on 24.03.2014. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 03.06.2014.

Appellant deposited  
Process fee & Security  
Rs. 16000 Bank Receipt  
attached with file.

Member

4, 17.04.2014

This case be put before the Final Bench II for further proceedings.

Chairman

03.6.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Sajjad Rashid, AD for respondent No.1 present and requested for time. None is available on behalf of respondent No.2. Fresh notice be issued to her. To come up for written reply on 20.8.2014.

MEMBER

MEMBER

20.08.2014



Counsel for the appellant and Mr. Muhammad Jan, GP with Mosam Khan, AD and Nawaz Khan, Principal for the respondents present. The learned Member is on official tour to Abbottabad. To come up for the same on 20.10.2014.

READER

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. \_\_\_\_\_ 413/2014 \_\_\_\_\_

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	24/03/2014	<p>The appeal of Mst. Musrat Perveen presented today by Mr. Ashraf Ali Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	<u>25-3-2014</u>	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>17-4-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 413 /2014

Mst: Musrat Parveen PSHT  
BPS-(15)  
.....Appellant

Versus

The Director of Education (E &  
SE), Govt: KPK and others  
.....Respondents

## INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal with Affidavit			1-6
2.	Copy of promotion Order	15-03-2013	A	7-9
3.	Copy of Corrigendum	26-03-2013	B	10
4.	Copy of Transfer order	19-06-2013	C	11-13
5.	Copy of departmental representation		D	14
6.	Copy of order	28-01-2013	E	15
7.	Copy of impugned order	12-12-2013	F	16
8.	Copy of departmental appeal		G	17-18
9.	Wakalat Nama			19

*Musrat Parveen*  
Appellant

Through

*Ashraf Ali*  
Ashraf Ali Khattak

and

*Nawab Zafar*  
Nawab Zafar  
Advocates, Peshawar

Dated: 24 / 03/ 2014

1

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

Service Appeal No. 413 /2014

446  
24-3-2014

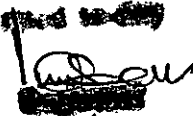
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Versus

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Pakhtunkhwa, Dubghri Garden, Peshawar.
2. The District Educational Officer (Fe male), (E & SE) District  
Karak.....Respondents.

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Service Appeal under section 4 of the Khyber Pakhtunkhwa,  
Service Tribunal Act, 1974 read with 10 of the Civil Servant Act,  
1973 and read with Khyber Pakhtunkhwa (Appointment,  
Deputation, Posting and Transfers , Lecturers, Instructors and  
Doctors) Regulatory Act, 2011 against the impugned order  
No.748-51 dated TN the 12-12-2012 of respondent No.2 and  
against which appellant filed departmental appeal, which is still  
pending without disposal.

 Prayer:-

On acceptance of the instant service appeal this Honourable  
Tribunal may graciously be pleased to declare the impugned  
order as politically motivated, against Union Council Policy of the  
Govt; against posting transfer policy, illegal, unlawful, without  
lawful authority and set aside the same with direction to the  
respondents to allow the appellant to continue her duty at her

24/3/14

**lawful station of posting i.e GGPS- Serak Banda Tehsil Takht-e-Nasrati, District Karak.**

---

Respectfully Sheweth,

Facts giving rise to the present appeal are as under:-

1. That appellant has been serving in the respondent department as Primary School Head Teacher (BPS-15). She has long standing service at her credit with unblemished and clean sheeted conduct record. She has never been rated as unqualified and inefficient.
2. That vide Order Endst: No.534-40/AE-III(F) CT Dated Karak the 15-03-2013 (Annexure-A) respondent No.2 issued a joint order, wherein she along with other promoted the appellant from BPS-14 to BPS-15 and posted her at Maheet Khan Korona Tehsil Takht-e-Nasrati District Karak.
3. That later on Corrigendum was issued on 26-03-2013 (Annexure-B) and appellant was posted at GGPS Serak Banda (the impugned station).
4. That after lapse of about 03 months appellant was transferred and posted at GGPS Machaki Band (Annexure-C).
5. That being aggrieved from the premature transfer order appellant preferred departmental appeal/Review Petition before the respondent No.2 (Annexure-D) and she was gracious to retain her at GGPS Serik Banda (Annexure-E).
6. That appellant was again subjected to transfer vide impugned order dated 12-12-2013 (Annexure-F) and that too to a very far flung area which is not only outside of her Union council, but

also very far from her own native village and it take 3 to 4 hundred hours to reach there.

7. That it is pertinent to mention here that the impugned order has been passed on the direction of local MPA, who is also Advisor to the Chief Minister of Khyber Pakhtunkhwa in order to get revenge from the male folk of her family by not supporting him in the elections.
8. That appellant being aggrieved from the impugned politically motivated order preferred departmental appeal (Annexure-G) before the respondent No. 1, which has not been disposed of as per law and rules and policy, hence the statutory period has elapsed therefore, the instant service appeal inter alia on the following grounds:-

**Grounds:**

- A. That Respondents have not treated petitioner in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973. The impugned transfer order is against section 3(3) of the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfers , Lecturers, Instructors and Doctors) Regulatory Act, 2011 and against the union council policy of the Govt. of Khyber Pakhtunkhwa, therefore, the impugned order is unlawful, unjust, unfair and hence not sustainable in the eye of law.
- B. That the impugned order is politically motivated and has been passed on the directions of Malik Qasim Local MPA and Advisor the Chief Minister of the Province of Khyber Pakhtunkhwa who is no authority and say in the departmental affairs of the respondents. The same is against the spirit and

provision of Para No.1 of the posting and transfer policy.

- C. That the impugned transfer order is against the spirit and provision of the Govt Policy. As per Notification No. SO(PE) E & SE/4-3/APPTT/PTC RULES/POLICY/VOL.III/2011 dated June 3, 2011 (Annexure-H), PST- teacher can only be adjusted in his/her own Union Council and not in another Union Council. The wording of the Notification are reproduced for kind consideration of the Honourable Tribunal as under:-

“ The vacancy of primary school teacher **shall** be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their computerized National Identity Card and Domicile, on merit and if no eligible candidate in that Union Council is available where the school is situated, such appointment shall be made on merit from amongst the eligible candidates belonging to the adjacent Union Councils.

Provided that on availability of a vacancy, a primary school teacher, appointed from adjacent Union Council as referred to in this subsection, shall be transferred against a vacant post in the school of the Union Council of his residence within a period of 15 days.”

From the above provision of policy, it is clear that primary school teacher can only be appointed and adjusted/transferred to the school of his/her own native Union Council. On this score, as appellant has been transferred and posted at school which is not only far from her native village, but out of her native union council. The malafide on the part of respondents is visible from the fact that they have endorsed the copy of the impugned transferred order to Local MPA, who has no authority in posting and transfer of the respondent department.



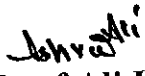
- D. That the impugned transfer order is very pre mature and against the declared tenure policy.
- E. That the impugned transfer order is against Para No. IV, V, VI, VII of the posting and transfer policy.

For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this writ petition, this Hon'ble Court may graciously be pleased allow the appeal as prayed for above.


Any other relief as deemed appropriate in the circumstances of case not specifically asked for may also be granted to petitioner.

Through

  
Petitioner

  
Ashraf Ali Khattak

and

  
Nawab Zad  
Advocates, Peshawar.

Dated: 24 / 03/ 2014

BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

Service Appeal No. \_\_\_\_\_/2014

Mst: Musrat Parveen PSHT BPS-(15) .....Appellant.

Versus

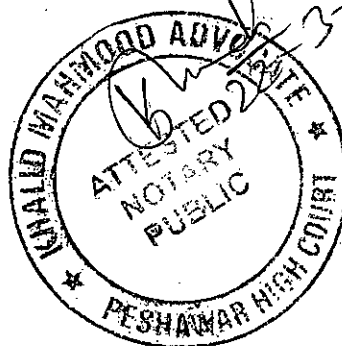
The Director of Education (E & SE), Govt: of Khyber Pakhtunkhwa,  
Dubghri Garden, Peshawar one another.....Respondents

Affidavit

I, Mst: Musrat Parveen PSHT BPS-(15) Mst: Musrat  
Parveen PSHT BPS-(15), do hereby solemnly affirm and  
declare on oath that the contents of this writ petition are  
true and correct to the best of my knowledge, and nothing  
has been concealed from this Hon'ble Court.

Identified by

*Ashraf Ali*  
Ashraf Ali Khattak  
Advocate, Peshawar



*Musrat Parveen*  
Deponent

نوٹیفکیشن دین تحصیل صدر پشاور تحصیل خلیہ خلیہ

"A"

جوانہ صدر پشاور خلیہ خلیہ

03465595405 (7) ماسٹر گلبرگ پلوٹ خلیہ خلیہ

Annexure-A

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KARAK

NOTIFICATION:-

Consequent upon the recommendation of the Departmental promotion committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (PE)4/SSRC/Meeting/2012/Teaching Cadre Dated November 13-02-2012 and further circulated by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar No 1702-27/promotion to B 14/1.stab: Dated Peshawar the 18-11-2012, the following Senior Primary School Teachers (SPS) 14 are hereby promoted to the post of female senior PSHTs B-15 on regular basis under the existing policy of the Provincial Government in teaching Cadre on the terms and condition given below with immediate effect and further hereby posted in the Govt Primary Schools noted against each newly upgraded post from B-14 to B-15

S.No	S/List No	Name	Present School	Posted to GGPS	Remarks
1	1	Fazal Khana	GGPS Babal Khel	Babal Khel	Post upgraded from B-14 to B-15
2	2	Nasreen Begum	GGPS Lalamber 1	Lalamber 1	Post upgraded from B-14 to B-15
3	3	Farda Begum	GGPS Surdag	Surdag	Post upgraded from B-14 to B-15
4	4	Nusrat perveen	GGPS Rauf abad	Rauf abad	Post upgraded from B-14 to B-15
5	5	Sajda begum	GGPS Zerki nasrati	Zerki nasrati	Post upgraded from B-14 to B-15
6	6	Aqal Zamzura	GGPS Dagar Nari No2	Dagar Nari No2	Post upgraded from B-14 to B-15
7	7	Najma Sultan	GGPS Shawa nasrati	Shawa nasrati	Post upgraded from B-14 to B-15
8	8	Parwan Bibi	GGPS Khojaki Daraz Khel	Khojaki Daraz Khel	Post upgraded from B-14 to B-15
9	9	Zubida khanum	CMS Nusrat abad	Wagi Banda	Post upgraded from B-14 to B-15
10	10	Gushan araz	GGPS Shanki Banda Tin	Shanki Banda Tin	Post upgraded from B-14 to B-15
11	11	Sajda tanveer	GGPS Nan khura	Nan khura	Post upgraded from B-14 to B-15
12	12	Pio Begum	GGPS Inzar Muhammad Jan	Inzar Muhammad Jan	Post upgraded from B-14 to B-15
13	13	Ishrat Parveen	GGPS Karak No.1	Karak No.1	Post upgraded from B-14 to B-15
14	14	Musrat Jubeen	GGPS Piran Miangan	Piran Miangan	Post upgraded from B-14 to B-15
15	15	Hamida begum	GGPS Haji Banda	Haji Banda	Post upgraded from B-14 to B-15
16	16	Gul Banoo	GGPS Muhtee Kala (Gharbe)	Muhtee Kala (Gharbe)	Post upgraded from B-14 to B-15
17	17	Fareeda Khanam	GGPS Bangi Kala	Bangi Kala	Post upgraded from B-14 to B-15
18	18	Awalya Bibi	GGPS Khojaki Killa	Khojaki Killa	Post upgraded from B-14 to B-15
19	19	Roshni Begum	GGPS Saral Khel	Saral Khel	Post upgraded from B-14 to B-15
20	20	Akhter Begum	GGPS Warana Lalamber	Warana Lalamber	Post upgraded from B-14 to B-15
21	21	Shern Durr	GGPS Mashrafi Banda	Mashrafi Banda	Post upgraded from B-14 to B-15
22	22	Gul Nasreen	GGPS Mina Wala	Mina Wala	Post upgraded from B-14 to B-15
23	23	Bani Sargara	GGPS Shanamir Banda	Shanamir Banda	Post upgraded from B-14 to B-15
24	24	Rehman Bibi	GGPS Surati Killa	Surati Killa	Post upgraded from B-14 to B-15
25	25	Khan Zar Bibi	GGPS Alam Sheree Banda	Alam Sheree Banda	Post upgraded from B-14 to B-15

Attested  
To be true copy  
Advocate

Handwritten notes on the right margin, including a signature and some illegible text.

270	354	Zahoor Nisa	GGPS	Hassan Abad Lalamber	Hassan Abad Lalamber	Post upgraded from B-14 to B15
271	356	Zahida Begum	GGPS	Marwatian Banda	Marwatian Banda	Post upgraded from B-14 to B15
272	357	Zar Taj Begum	GGPS	Mechar Banda	Mechar Banda	Post upgraded from B-14 to B15
273	358	Saima Akhter	GGPS	Zer Khan Kalla	Zer Khan Kalla	Post upgraded from B-14 to B15
274	359	Saeeda Parveen	GGPS	Mehmood Khel	Mehmood Khel	Post upgraded from B-14 to B15
275	360	Irena Bibi	GGPS	Bandi Khel	Pordil Banda	Post upgraded from B-14 to B15
276	361	Nayar Dakhshan	GGPS	Teri No 2	Hala'a	Post upgraded from B-14 to B15
277	367	Rohana Parveen	GGPS	Sarfaraz Korona	L. Ghani Khel	Post upgraded from B-14 to B15
278	363	Muhtab Hissa	GGPS	GGPS Shan Qaiser Banda	Shan Qaiser Banda	Post upgraded from B-14 to B15
279	365	Bibi Tarina	GGPS	Danish Khel	Danish Khel	Post upgraded from B-14 to B15
280	366	Toneeda Bano	GGPS	Laki Banda 1	Laki Banda 1	Post upgraded from B-14 to B15
281	367	Ayona 147	GGPS	Dabbar Banda	Dabbar Banda	Post upgraded from B-14 to B15
282	369	Hirdas Begum	GGPS	GGPS Official Colony Karan	Shaq Lwaghar	Post upgraded from B-14 to B15
283	370	Balak Naz	GGPS	Kota Killa No 2	Dhoda Khel	Post upgraded from B-14 to B15
284	371	Khar u Nisa	GGPS	Mohali Kalla Sharqi	Mohali Kalla Sharqi	Post upgraded from B-14 to B15
285	373	Naseem Jehan	GGPS	Haji Banda	Hamidan Banda	Post upgraded from B-14 to B15
286	375	Hajra Bibi	GCMS	Tara Khel	Dabli Lwaghar No 2	Post upgraded from B-14 to B15
287	376	Zahoor Nisa	GGPS	Ambon Kila	Kando Khel	Post upgraded from B-14 to B15
288	378	Yasmeen Begum	GCMS	Inzar Banda	Maveer Khan	Post upgraded from B-14 to B15
289	384	Dil Shari Begum	GGPS	Karak No 1	Hakro Khel	Post upgraded from B-14 to B15
290	385	Misal Taj	GCMS	Tatar Khel	Shinwa & Cuddi Khel	Post upgraded from B-14 to B15
291	386	Yasmeen Akhter	GGPS	Khusnal Hassan Kur	Seri Khwa	Post upgraded from B-14 to B15
292	387	Fahim Sultan	GGPS	Shawa Totaki	Shawa Totaki	Post upgraded from B-14 to B15
293	388	Shaheen Guliana	GGPS	Zari Churyan	Shawa Khel	Post upgraded from B-14 to B15
294	389	Nusrat Jehan	GGPS	Totaki	Totaki	Post upgraded from B-14 to B15
295	391	Shamsad Begum	GGPS	Khurram No 2	Khurram No 2	Post upgraded from B-14 to B15
296	392	Gaisar Yasmeen	GGPS	Usak Chuntra	Usak Chuntra	Post upgraded from B-14 to B15
297	393	Taleema Yasmin	GGPS	Wimilha Khel	Wimilha Khel	Post upgraded from B-14 to B15
298	394	Anwar Sultan	GGPS	Zawa Banda	Zawa Banda	Post upgraded from B-14 to B15
299	395	Shanida Parveen	GGPS	Haq Nawaz Korona	Nar Sadai Khel	Post upgraded from B-14 to B15
300	396	Mentah Akhter	GGPS	Ganderi khaltak	Sandri Ayaz	Post upgraded from B-14 to B15
301	397	Ferooz Hissa	GGPS	Dabbar Banda	Karim Khel	Post upgraded from B-14 to B15
302	398	Mosha Akhter	GGPS	Manki Banda	Manki Banda	Post upgraded from B-14 to B15
303	400	Abida Nusrat	GGPS	Nushpa Banda	Nushpa Banda	Post upgraded from B-14 to B15
304	401	Bibi Mushtaq	GGPS	Davgara	Karim Bay Khel	Post upgraded from B-14 to B15
305	402	Jeha Nisa	GGPS	Sher Nawab Korona	Wargha Banda	Post upgraded from B-14 to B15
306	403	Farhat Begum	GCMS	Nazim abad	Gulistan	Post upgraded from B-14 to B15
307	404	Rukh Sa Begum	GGPS	Koshka Banda	Banadar Khel No 1	Post upgraded from B-14 to B15

Attested  
To be true copy  
Advocate

(Sd/-) M. Iqbal Khan

312	410	Tabasam Sherni	CGPS	Yaghi Musakan	Yaghi Musakan	Post upgraded from B-14 to B15
313	411	Hibi Amina	CCMS	Laki Chumlaki	Spoona Faqeer Abd	Post upgraded from B-14 to B15
314	412	Noor Sh Jehan (Bogum)	GCMS	Inzar Muhammad Jan	Deli Mola	Post upgraded from B-14 to B15
315	413	Kishwar Sultan	CGPS	Machaki banda	Baun Khel	Post upgraded from B-14 to B15

Terms and conditions.

1. They would be on probation for a period of one year extendable for another one year
2. They will be governed by such rules and regulations as may be issued from time to time by the government.
3. Their services can be terminated at any time, in case her performance is found un-satisfactory during probationary period. In case of misconduct, she should be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-Se seniority on lower post will remained intact
6. No TA/DA is allowed
7. They will give an undertaking to be recorded in their service book to the effect that if any overpayment is made to her in the light of this order will be recovered and if she is wrongly promoted she will be reserved

ZAIB UN NISA  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Encl: No. S34-40 AL III (F) CI Dated Karak the 15 /03/2013.

Copy to the -

1. PS to Secretary Elementary and Secondary Education, Department Khyber Pakhtunkhwa
2. PA to Director of Elementary and Secondary Education Khyber Pakhtunkhwa
3. To his No and date cited above
3. Distt. Accounts Officer Karak
4. Sub-Divisional Education Officers (female) concerned for necessary action
5. Teacher Concerned

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

ماسٹر بلڈ گولڈ کاپی لکھنوی  
03465595405

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Main Bazar, Karak, CN  
Phone: 0333-211902  
Email: asiflaptop@ptt.com.pk

**Attested**  
To be true copy  
Affidavate

(10)

"Annexure - B"

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KARAK**

**CORRIGENDUM / ADJUSTMENT**

Consequent upon the promotion of the following  
PHST BPS -15 , vide this office Endst: No . 534-40/AE -III (F) Ct dated karak  
The 15/03/2013 Partial modification in above mentioned order may be  
read are as under

S.NO	Name Designation	From	To	Remarks
1	Mst: Nasreen Hameeda PSHT BPS -15	GGPS Serki Lawagher NO : 2	GGPS Wanki Sirag Khel NO : 1	Due to Refusal of Mst : Romana Bibi
2	Mst : Bibi Shafa PST BPS-15	GGPS Kasmari Banda	GGPS Sera khawa	S.NO 3
3	Yasmeen Akhtar PST BPS-15	GGPS Sera khawa	GGPS O.D Ghundi Mir Khan Khel	S.NO :2
4	Musrat Parveen PSHT BPS -15	GGPS Muheet Khan Kor	GGPS Serak Banda	Due to Refusal of Mst :

ZAIB-U-NISA  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst ,No:- 590-95 Dated Karak the 26 / 3 / 2013

**COPY TO**

- 1 SDEO (F) Takht-e-Nasrati
- 2 SDEO(F) Karak
- 3 Teacher Concerned

DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

**Attested**  
*[Signature]*  
To be true copy  
Advocate

(11)

Annexure - C

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KARAKADJUSTMENT

Consequent upon the following Senior PSTs/PST's Mistresses were effected on the promotion of Senior PSHTs BPS-15 and adjusted at the school noted against each on their own pay and BPS-14 and BPS-12 in the best interest of public services with immediate effect.

S.No	Name	From GGPS/GGCMs	To GGPS/GGCMs	Remarks
1	Kalsoom Jalal PST	Wanki Siraj Khel	Chitta Banda	
2	Shamshad Begum PST	GGPS Jattan Banda	GGPS Inzar Muhammad Jan	
3	Salma Perveen PST	GGCMS Inzar M/Jan	GGPS Topi Killa	
4	Gul Khana Zada PST	GGPS Kaster Banda	GGPS Khujaki Killa	
5	Fahmida Nasreen PST	GGPS Yaqubi Killa	GGPS W/Mashan Khel	
6	Furkh Naz PST	GGPS Gurguri	GGPS Yaqubi Killa	
7	Bala Nash Naz PST	GGPS Umer Din Killa	GGPS Udin Shah	
8	Ferooza PST	GGPS Dabaki Banda	GGPS Dabaki Banda	
9	Tasleem Khana PST	GGPS Machaki Banda	GGPS Serak Banda	
10	<del>Muhammad Farhat</del> PST	GGPS Serak Banda	GGPS Machaki Banda	
11	Duran Begum PST	GGPS Jangraza	GGPS Umer Jan Kor:	
12	Ulfat Begum PST	GGPS Shahidan Payan	GGCMS Hayder Khan	
13	Almas Anjum PST	GGPS Palosi No.2	GGPS Aral Banda	

Note: No TA/DA is allowed.

Charge Report should be submitted to the concerned.

(PERVEEN BEGUM)  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst. No.

2035-37

Dated Karak the

19-06-2013

Copy to the:-

1. Sub Divisional Education officer (F) Karak, Takhti Nasrati.
2. ASDEO(F) Circle Karak, Takhti Nasrati, Hamidan with the remarks to inform the Mistresses concerned to obey the order forthwith

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Attested

*[Signature]*  
To be true copy  
Advocate

(11-11)

(12)

Better Copy

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KARAK**  
**ADJUSTMENT**

Consequent upon the following senior PSTs/PSTs Mistresses were affected on the promotion of senior PHSTs BPS-15 and adjusted at the school noted against each on their own pay and BPS-14 and BPS-12 in the best interest of public services with immediate effect.

S.NO	NAME	FROM GGPS/GGCMS	TO GGPS/GGCMS	REMARKS
1	Kalsoom Jalal PST	Wanki siraj khel	Chitta banda	
2	Shamshad begum PST	GGPS Jatan banda	GGPS Inzer Muhammad jan	
3	Salma parveen PST	GGCMS Inzer/M/jan	GGPS Topi kalla	
4	Gul khana zada PST	GGPS Kaster banda	GGPS Khujaki kalla	
5	Fhahmeeda nasreen PST	GGPS Yaqubi kalla	GGPS W/Mashan khel	
6	Furkh naz PST	GGPS Gurguri	GGPS Yaqubi kalla	
7	Bala nash naz PST	GGPS Umar din kalla	GGPS Udin shah	
8	Ferooza PST	GGPS Dabaki kalla	GGPS Dabakki banda	
9	Tasleem khana PST	GGPS Machaki banda	GGPS Serak banda	
10	Kishwar sultan PST	GGPS Serak banda	GGPS Machaki banda	
11	Duran begum PST	GGPS Jangrezi	GGPS Umar jan kor.	
12	Ulfat begum PST	GGPS Shahidan payan	GGCMS Hayder khan	
13	Almas anjum PST	GGPS Paloskai NO.2	GGPS Aral banda	

Note: No T.A/D.A is allowed.

Charge report should be submitted to all concerned.

(PAR VEEN BEGUM)  
 DISTRICT EDUCATION OFFICER  
 (FEMALE) KARAK.

Endst: No. 2035-37

Dated Karak the 19-06-2013.

Copy to:-

1. Sub Divisional Education Officer (F) Karak, Takht-e-Nasrati
2. ASDEO (F) Circle karak, Takht-e-Nasrati, Hamidan, with the remarks to inform the Mistresses concern to obey the order forthwith.

DISTRICT EDUCATION OFFICER  
 (FEMALE) KARAK.

**Attested**  
*[Signature]*  
 To be true copy/  
 Advocate



(12)

13

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KARAK

CORRIGENDUM

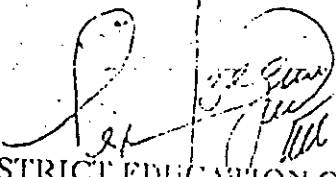
The Adjustment order of PSHT B-15 issue vide this office no.2035-37 Dt: 19.6.2013. The S.No.10 may be read Mst: Musarat Perveen PSHT instead of Mst: Kishwar Sultan PSHT.

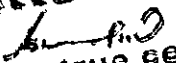
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst: No. 2055-56 / Dated Karak the 19/6 /2013.

Copy to the:-

1. Sub Divisional Education Officer (Female) Takhti Nasrati.
2. ASDEO(F) Circle Concerned.
3. Teacher Concerned.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

**Attested**  
  
**To be true copy**  
**Advocate**

Annexure-D خدمت جناب عالیہ (F) DEO (F) کراچی

تاریخ: 14-10-2013 مورخہ

بوساطت SDEO (F) تحت لفتری

عنوان: منسوخی تبادلہ "GGPS Serak Banda - GGPS Machaki Banda" مورخہ 19-6-2013

جناب عالیہ!

سائلہ مندرجہ ذیل عرض رساں ہے۔

1- مجھے آرڈر نمبر 40-534 مورخہ 15-3-2013 کے تحت سکیل 15 میں ترقی دیکر

GGPS Machaki Banda میں تعیناتی کی گئی۔

2- اسی آرڈر میں تبدیلی کر کے آرڈر نمبر 95-590 مورخہ 26-3-2013

کے تحت GGPS Serak Banda میں لائی گئی۔

3- مورخہ 19-6-2013 آرڈر نمبر 57-35 مورخہ تسلیم خانہ GGPS Serak Banda

لائی گئی اور میرا تبادلہ GGPS Machaki Banda اسی آرڈر میں ہو گیا۔

4- مورخہ 26-3-2013 کو میں نے GGPS Serak Banda میں Head Teacher

کے طور پر چارج لے لی۔ اگلی مشکل مجھے 3 مہینے بھی نہیں ہوئے ہیں کہ میرا

تبادلہ کیا گیا۔ آپ سے درخواست ہے کہ چونکہ میں "TENURE" اگلی پوز

نہیں ہوا۔ اس لئے آپ صاحبہ سے رہائی فرما کر میرا تبادلہ منسوخ کر کے

GGPS Serak Banda پر مجھے برقرار رکھ لے۔ سائلہ عمر پھر آپ کیلئے

دعا گو رہے گی۔

عرفی

آپ کی فرمانبرداری صرت پر میں بیٹا بیچر GGPS Serak Banda تحت لفتری کراچی

نوٹ: آرڈر کا پیمانہ منسلک کی گئی ہے۔

Forwarded to the DEO (F) copy to DEO (F) Karak

For Further N/A

Attested  
to be true copy  
Advocate

Sub Divisional Education  
Officer (Female) Takuli (Nasrett)

14/10/2013

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) T/NASERTI  
TRANSFER:

The transfer of the P.T teachers are hereby ordered to the School noted against each on her own pay and BFS in the interest of public service from the date of her taking over-charge.

S.No.	Name of OFFICER	FROM:	To.	Remarks.
1.	Kashwar Sultana, PNST GGPS <sup>Khana</sup> Mehsot Khan Karocan		GGPS Machaki Banda	S.No.2
2.	Tajaslum-Begum, FNST GGPS <sup>Perwan</sup> Machaki Banda		Mehcet Khan Karocan	S.No.1
3.	Musrat Begum, FNST her performed his duty		GGPS Serak Banda.	

Notes:

1. NO TA/DA is allowed.
2. Change report should be submitted to all concerned.
3. Mst:Kashwar Sultana & Mst:Musrat Begum were charge as P.T, Both were not duty at GGPS Mehcet Khan Karocan

FANCOO JAMAL  
 Sub Divl: Education Officer  
 (Female) T/Nasert.

Endst:No. 632 / Dated the 28 / 10 / 2013.

Copy to the:-

1. Distt: Education Officer (F) Karak for approval please.

Sub Divl: Education Officer  
 (F) T/Naserti.

**Attested**  
 To be true copy  
 Advocate

(16)

Annexure - F

Office of the Sub Division Education Officer Female Primary  
Elementary & Secondary Education Takhat-E- Nasrati District Karak

TRANSEFER ORDER

Mst Musarat Parveen PST BPS-15, in Government Girls Primary School  
Seerak Banda is hereby transferred to Government Girls Primary School BANJEKH  
Banda against the vacant post in the best interest of public service..

- Note 1 No TADA is allowed  
2 Charge report should be submitted to all concerned

(Shah Naz Begum)  
SDEO (F) Takhat-e-Nasratee

Ends. No.748-51

Dated TN The 12/12/2012

Copy for information.-

1. District Education Officer (F) Karak
2. Malik Qasim Advisor to Chief Minister KPK
3. Chairman DADC Karak

*Shah Naz Begum*  
Sub Divisional Education Officer,  
Female Takhat-e- Nasrati

جناب والا شان ناظم تعلیمات سکولز صوبہ خیبر پختون خواہ پشاور

محکمہ ایمل مورخہ 16/12/2013 بواسطت DEO (F) Karak

عنوان: منسوخی تبادلہ From GGPS Banjekh Banda To GGPS Serak Banda

جناب عالی

سائلہ مندرجہ ذیل عرض رساں ہے۔

- 1- مجھے آرڈر نمبر 40-534 مورخہ 15/03/2013 کے تحت BPS 15 میں ترقی دیکر GGPS محیط خان کورونہ میں تعینات کی گئی۔
  - 2- اسی آرڈر میں تبدیلی کر کے آرڈر نمبر 95-590 مورخہ 26/03/2013 کے تحت GGPS Serak Banda میں تعینات کی گئی۔
  - 3- مورخہ 19/06/2013 آرڈر نمبر 57-2035 مساتہ تسلیم خانہ GGPS Serak Banda لائی گئی۔ اور میرا تبادلہ GGPS Machki Banda اسی آرڈر میں کی گئی۔
  - 4- مورخہ 27/06/2013 کو میں نے GGPS Serak Banda ہیڈ ٹیچر کے طور پر چارج لے لی۔ ابھی بمشکل مجھے 3 ماہ بھی نہیں ہوئے تھے۔ کہ میرا تبادلہ آرڈر نمبر 37-2035 مورخہ 19/06/2013 کے تحت GGPS Machki Banda کی گئی۔
- میں نے سابقہ SDEO(F) نانس جمال صاحبہ کو درخواست دے دی۔ اور تین سال tenure پورا کرنے درخواست کی۔ انھوں نے میری درخواست پر غور و خوض کی اور میرا تبادلہ منسوخ کر دی۔

مورخہ 12/12/2013 کو SDEO (F) نے سیاسی بنیاد پر قواعد و ضوابط کے خلاف میرا تبادلہ GGPS Serak Banda

سے GGPS Banjekh Banda کیا گیا۔

لہذا آپ صاحب سے بھی گزارش ہے کہ میرا آرڈر کنسل کر کے GGPS Serak Banda میں Tenure پورا کرنے کا موقع دیں۔ سائلہ عمر بھر دعا گو ہے گی۔

الغرض

آپ کی فرمان بردار مسرت پروین ہیڈ ٹیچر (Karak) GGPS Banjekh Banda Takht-e-Nasrati

#03339719227

COPY TO

- 1 Chief Minister(KPK)
- 2 Minister of Education (KPK)
- 3 Minister of Finance (KPK)
- 4 DEO (F) Karak
- 5 President PTI Karak

Zahir

24/12/13

DD B (F)  
23/12/2013  
m  
out up

311  
24/12

Attached

To be copy  
date

18

Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

No. 4958 /F.No, 77/(F)/Appeal.

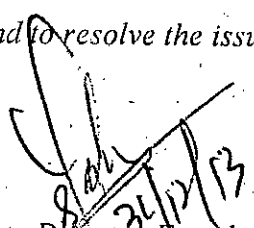
Dated Peshawar the 31/12 2013.

To


The District Education Officer,  
(Female) Karak

Subject APPEAL

I am directed to refer to the subject cited above and to enclosed herewith a copy of application in respect of Mst. Musarat Parveen PHST GGPS Banjekh Banda Takht-e-Nasrati Karak and to ask you to probe into the matter and to resolve the issue at your own level being competent authority under the rules.

  
Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa,  
31/12/13

**Attested**

  
To be true copy  
Advocate.

بعدالت

Before The Khyber Pakhtoonkhwa  
Service Tribunal, Peshawar

Appellant

2 منجانب

مسماة مسٹر پروین

بنام

ڈائریکٹر ایجوکیشن خیبر پختونخواہ پشاور

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام پشاور کیلئے اشرف علی نقی اینڈ نواب زادہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر حالت فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکورہ کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم \_\_\_\_\_ 28 مارچ 2014

Attested and  
Accepted \_\_\_\_\_  
N. Perveen

N. Perveen

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

Service Appeal No. \_\_\_\_\_ 413/2014

Mst. Musrat Parveen      Versus      Education

**REJOINDER ON BEHALF OF THE APPELLANT**

**Respectfully Sheweth,**

Preliminary Objection:-

(1 to 13)

All objections raised by the respondents are incorrect. Rather the respondents are estopped to raise any objection due to their own conduct.

**On Facts:-**

1. Para No. 1 of the appeal is correct and more ever also admitted by the Respondents so no comments.
2. Para No. 2 of the appeal is correct and Para of the reply is incorrect.
3. Admitted correct, hence need no comments.
4. Incorrect hence denied.
5. Incorrect the contents of the Para 5 of the appeal are correct.



6. Incorrect the contents of the Para No. 6 of the appeal are correct.

7. Incorrect hence denied.

8. Incorrect.


**On Grounds:-**

All Grounds of this appeal is correct and an accordance with law and rules and the respondents are incorrect and baseless and estopped due to their own conduct. That the respondents transferred the appellant in violation of the Transfer/Posting Policy. That the transfer of the appellant is also politically motivated.

It is, therefore, most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted in favour of the appellant.

Appellant

Through

  
**Uzma Syed**  
Advocate