


28.08.2022

No one present on behalf of appellant.

Security and process fee not deposited. Therefore notices be issued to the appellant and her counsel for submission of security and process fee within 7 days. To come up for further proceedings on 16.08.2022 before S.B.

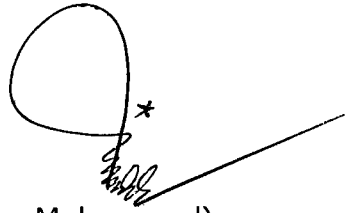

(Fareeha Paul)
Member (E)

26.05.2022

Mr. Malik Saqib Khan, Advocate for the appellant present.
Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant is serving for the last 30 years in respondent department and presently holding the post of PSHT (BS-15). She is aggrieved of the impugned order dated 10.02.2022 whereby her earlier adjustment order to GGPS Samar Bagh Peshawar dated 31.01.2022 was withdrawn. She has been frequently transferred i.e. first vide order dated 31.01.2021 then 30.09.2021 in utter violation of the Posting Transfer Policy of Provincial Government when she was not allowed to complete her normal tenure of two years. The impugned transfer order is also violative of Clause I and IV of the said policy. The school going children of the appellant are disturbed due to which she did not relinquish the charge at GGPS Samar Bagh and she is still performing duty there. Her departmental appeal dated 01.03.2022 was not responded by the appellate authority whereafter she approached the Honourable Peshawar High Court as the Service Tribunal was non functional during that period. Her Writ Petition has been sent by the Honourable Peshawar High Court to Service Tribunal vide order dated 22.03.2022 which was received in the Service Tribunal on 01.04.2022 as is evident from note of the Registrar Service Tribunal.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 28.06.2022.




(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. _____ **465/2022**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	01/04/2022	<p>The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court Peshawar and the Hon'ble High Court vide its order dated 22.03.2022 while treating the Writ Petition into an appeal and has sent the same to this Tribunal for decision in accordance with law. The same may be entered in the Institution register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;">  REGISTRAR </p>
2-		<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put up there on <u>26-05-2022</u> Notices be issued to the appellant and his counsel for the date fixed</p> <p style="text-align: right;">  CHAIRMAN </p>



The
PESHAWAR HIGH COURT
Peshawar

Ph: No. 091-9210149-58

No. 49945 (1)/984/2022/WP-MN

Dated. 30-March-2022

From

Deputy Registrar (J),
Peshawar High Court,
Peshawar.

To

✓
The Khyber Pakhtunkhwa Service Tribunal, Peshawar.

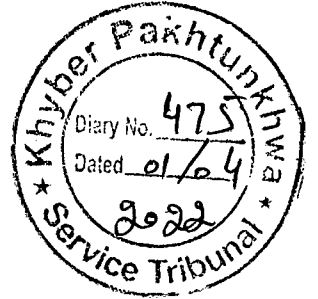
Subject: Writ Petitions W.P 1000/2022 Title: Mst. Nasira Bibi VS Govt of Kp

Memo,

I am directed to send herewith the titled case in original alongwith all annexures and copy of order of this Honble Court dated 22.03.2022 for compliance.

Foy

Deputy Registrar (J)
31/3/2022



Encl: As above.

(2)

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET

Date of order.	Order or other proceedings with the order of the Judge
22.03.2022.	<p><u>W.P No. 1000-P of 2022 with I.R.</u></p> <p>Present: Malik Saqib Khan, Advocate for petitioner.</p> <p>-----</p> <p><u>LAL JAN KHATTAK, J.-</u> Through the instant petition under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner seeks the following relief:-</p> <p><i>"on acceptance of this writ petition this hon'ble Court may graciously be pleased to:-</i></p> <p>a. <i>Set aside impugned office order issued by the respondents No.3 and 4 Endst. No. 2210-13 dated 10.02.2022 and be declared as illegal, unlawful, without lawful authority and thus is of no legal effect and hence liable to be reversed and the petitioner may kindly be posted in her original position as PSHT at Samar Bagh Peshawar. Or</i></p> <p>b. <i>Any other relief, not specifically prayed for in the circumstances of the case may also be passed in favour of the petitioner"</i></p> <p>2. As, by now, the Khyber Pakhtunkhwa Services Tribunal is made functional; <u>therefore, office shall send this case in original there for its decision after retaining copies thereof for record.</u> Disposed of accordingly.</p> <p>Announced: 22.03.2022</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p>

IN THE PESHAWAR HIGH COURT, PESHAWAR

CHECK LIST

Case title

Mst. Nasira Bibi

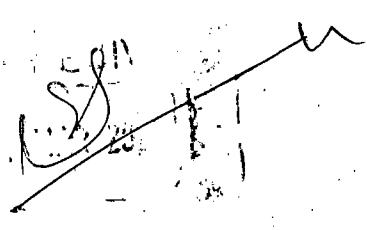
Vs

Govt. of KPK & others

<u>S #</u>	<u>CONTENTS</u>	<u>YES</u>	<u>NO</u>
1.	This petition has been presented by Malik Saqib Advocate		
2.	Whether Counsel / Petitioner / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether the enactment under which the case/petition is filed mentioned?	✓	
4.	Whether the enactment under which the case/petition is filed is correct?	✓	
5.	Whether affidavit is appended?	✓	
6.	Whether affidavit is duly attested by competent oath commissioner?	✓	
7.	Whether petition/annexure are properly paged?	✓	
8.	Whether annexures are certified?	✓	
9.	Whether certificate regarding filing any earlier appeal/petition on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether Special Power of Attorney filed?		
13.	Whether Special Power of Attorney attested?		
14.	Whether copy of application is delivered to A.G/D.A.G?		
15.	Whether Appeal, Revision application is within time?		
16.	Whether value for the purpose of Court fee and jurisdiction given in the relevant column of the opening sheet is correct?		
17.	Whether Power of Attorney of the Counsel engaged is attested and signed by all petitioners/appellants/respondents?	✓	
18.	Whether complete spare copy is filed in separate file cover?	✓	
19.	Whether numbers of referred cases given/ are correct?		
20.	Whether petition being sent by post?		
21.	Whether appeal/petition contains cuttings/overwriting?		✓
22.	Whether appeal/revision/ writ petition is competent?	✓	
23.	Whether list of books has been provided at the end of the petition?	✓	
24.	Whether case relate to this Court?	✓	
25.	Whether case relate to this Bench?	✓	
26.	Whether petition drafted by a competent person?	✓	
27.	Whether name of Jail in which appellant/petitioner/respondent is confined given?		
28.	Whether copies of annexures are readable/clear?	✓	
29.	Whether Court Fee stamps affixed?	✓	
30.	Whether Court Fee stamps annexed are sufficient?	✓	

31.	Whether certified copies of impugned order/decrees sheets before District Judge have been filed?		
32.	Whether in view of Order 43 Rule 3 CPC/Rule 2(3) Chapter 4-J, Vol: V of High Court Rules & Orders, notice along with copy of appeal/petition and annexures has been sent to respondents?	✓	
33.	Whether Judicial Officer whose orders are challenged mentioned at the bottom of the panel of respondents?		
34.	Whether index filed?	✓	
35.	Whether index is correct?	✓	
36.	Whether copies of comments/reply/rejoinder provided to opposite party?		
37.	Whether addresses of parties given are complete?	✓	
38.	Whether addresses of parties are complete?	✓	
39.	Whether list of L.Rs of petitioner filed?		
40.	Whether copy of list of L.Rs of respondents as filed before Courts below or if not, a certificate to this effect attached?		
41.	Whether opening sheet filed?	✓	
42.	Whether opening sheet is correct / complete?	✓	
43.	Whether approved file cover used?	✓	
44.	Whether separate application filed for each prayer?		
45.	Whether separate request has been made for interim relief in writ petition?		✓
46.	Whether security of Rs. 10,000/- deposited with review petition?		✓
47.	Whether review petition filed and certified by the Advocate who had argued the case resulting into order review of which is sought?		✓
48.	Whether purpose of the document filed explained?	✓	
49.	Whether respondents sued by name in the CoC?		

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



Name:

Malik Saqib Advocate

Signature:

Dated:

10-3-2022

URGENT FORM

IN THE PESHAWAR HIGH COURT PESHAWAR

W.P No. _____/2022

Mst. Nasira Bibi.....Petitioner

V E R S U S

Govt. of Khyber Pakhtunkhwa through
Secretary E&SE Peshawar & others.....Respondents

1. Will you kindly treat the accompanying **writ petition** as urgent and in accordance with the provisions of Rules 9, Chapter 3-A, Rules orders of the High Court Volume V.
2. The Grounds of urgency are:

“That the respondents are going to filing the said post, therefore captioned writ petition alongwith interim relief may kindly be fixed at earliest otherwise the petitioner would suffer extreme irreparable loss and the purpose of the instant writ petition would also become infructuous :


Petitioner

Through


Malik Saqib Khan
Advocate High Court

Dated 10.03.2022

**IN THE PESHAWAR HIGH COURT, PESHAWAR
OPENING SHEET FOR WRIT PETITION**

Date of Filing: __/__/2020
District:

Case Type: Writ Petition Nature of Original proceeding:

Category Code:

5	0	7	1	1
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(Categories & Sub Categories are given at the back of the opening

Review/ contempt of Court in respect of

Writ of:

Heabus Corpus		Prohibition		Mandamus	✓	Quo Warranto		Certiorari	✓
---------------	--	-------------	--	----------	---	--------------	--	------------	---

If Certiorari

Forum	Date	Interlocutory Final Order	
			<input type="checkbox"/> SB
			<input checked="" type="checkbox"/> DB

Petitioner Name	Mst. Nasira Bibi Wife of Arshad Javed,
Mobile No.	0332-9833385
Address	Head Teacher GGPS Samar Bagh, Peshawar
CNIC No.	17301-3969877-6
Email Address	Nil

Counsel for Petitioner (s)	Malik Saqib Khan Advocate High Court
Mobile	0300-4564654
Address	High Court Peshawar High
Council CNIC	17301-9567190-5
Email Address	Saqib_lawyer@yahoo.com

Respondents	Govt.. of Khyber Pakhtunkhwa through Secretary E&SE Peshawar and others
Address	Govt. of Khyber Pakhtunkhwa through Secretary E&SE Peshawar and others

Original order/Action/Inaction Companioned of"

Prayer
On acceptance of the instant writ petition this Hon'ble Court may graciously be pleased to

a) Set aside the impugned Office Order issued by the respondents No.3 and 4 Endst. No.2210-13,dated 10.02.2022 and be declared as illegal, unlawful, without lawful authority and thus is of no legal effect and hence liable to be reversed and the petitioner may kindly be posted in her original position as PSHT at Samar Bagh Peshawar. Or

b) Any other relief, not specifically prayed for in the circumstance of the case may also be passed in favour of the Petitioner.

Law/Rules/governing the original proceedings/action/inaction

Constitution of Islamic republic of Pakistan
Any other law book as per need

Signature

FILED TODAY

Deputy Registrar
11 MAR 2022

IN THE PESHAWAR HIGH COURT PESHAWAR

W.P No. 1000P/2022

Appeal no. 465/2022

Mst. Nasira Bibi.....Petitioner

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary E&SE Peshawar & & others.....Respondents

INDEX

S#	Description of Documents	Annex	Pages
1.	Opening sheet		A
2.	Writ petition		1-11
3.	Affidavit		12
4.	Addresses of parties		13
5.	Copies of CNIC and Domicile certificate	A-B	14-15
6.	Copy of Appointment order	C	16-20
7.	Copy of Promotion Order dated 25.02.2021 and Charge/arrival dated 26.02.2021	D-E	21-25
8.	Copy of Office Order dated 30.09.2021	F	26
9.	Copy of departmental dated 12.10.2021	G	27
10.	Copy of Office Order dated 31.01.2022	H	28
11.	Copy of Charge/Arrival report	I	29
12.	Copy of impugned Office order dated 10.02.2022	J	30
13.	Copy of Departmental Appeal dated 02.03.2022	K	31
14.	Court fee		33
15.	Wakalatnama		33

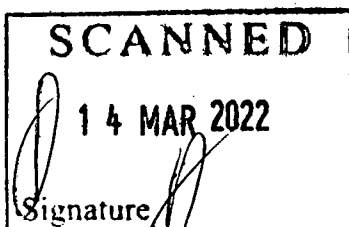
✓(a)✓
Petitioner

Through



Malik Saqib Khan
Advocate High Court

Dated 10.03.2022



FILED TODAY
Deputy Registrar
11 MAR 2022

1

IN THE PESHAWAR HIGH COURT PESHAWAR

Writ petition No. 1000P/2022
Appeal no. 465/2022

Mst. Nasira Bibi Wife of Arshad Javed,
Head Teacher
GGPS Samar Bagh, Peshawar.....**Petitioner**

V E R S U S

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
3. District Education Officer (Female) District Peshawar
4. Deputy District Education Officer (Female) District Peshawar
5. District Account Officer (Female) Peshawar
.....**Respondents**

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC
OF PAKISTAN AGAINST THE IMPUGNED
OFFICE ORDER DATED 10.02.2022
WHEREBY THE OFFICE ENDST. NO.1722-26
DATED 31.01.2022 REGARDING
ADJUSTMENT OF MST. NASIRA BIBI PSHT
GGPS SAMAR BAGH PESHAWAR IS
WHEREBY WITHDRAWN.**

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Deputy Registrar
11 MAR 2022

PRAYER IN WRIT PETITION

On acceptance of the instant writ petition this Hon'ble Court may graciously be pleased to

- a) Set aside the impugned Office Order issued by the respondents No.3 and 4 Endst. No.2210-13, dated 10.02.2022 and be declared as illegal, unlawful, without lawful authority and thus is of no legal effect and hence liable to be reversed and the petitioner may kindly be posted in her original position as PSHT at Samar Bagh Peshawar. Or
- b) Any other relief, not specifically prayed for in the circumstance of the case may also be passed in favour of the Petitioner.

Respectfully Sheweth:

That the Petitioner very implore for permission to plead his grievances at the hands of respondents and seeks solace thereto, as follows:

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Deputy Registrar
11 MAR 2022

1. That the petitioner is law abiding citizen of Pakistan and permanently residing at Samar Bagh P.O Samar Bagh Tehsil & District Peshawar. **(Copies of CNIC and Domicile certificate are attached as annexures "A & B")**.
2. That the Petitioner working as PTC teacher in the year of 2004 and thereafter has started career with zeal and dedication and served the department with best of abilities and full satisfaction of superior since appointment, it is also pertinent to mention here that since the appointment of Petitioner she had never given any chance to even a minor complaint to his high-up's and has rendered his services with passion and keenness. **(Copy of Appointment order dated is attached as annexure "C")**.
3. That as per the policy the petitioner was promoted as PSHT (BPS-15) vide Office Order No.1594-1646/Estab-II/FNo.PSHT promotion 2021 dated 25.02.2021 and was posted to GGPS Samar Bagh Peshawar and the petitioner charge his service on 26.02.2021 in the said school. **(Copy of Promotion Order dated 25.02.2021 and**

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Deputy Registrar
11 MAR 2022

Charge/arrival dated 26.02.2021 are attached as annexure "D & E").

4. That without any reason and without any complaint whatsoever the Office Order , No.522-25 dated 30.09.2021 was issued that one Mst. Gul-e-Rana PSTHT is hereby adjusted at GGPS Samar Bagh on the said post and the petitioner posted/transfer/adjusted to GGPS Essa Khel, Hameed. **(Copy of Office Order dated 30.09.2021 is attached as Annexure "F").**
5. That feeling aggrieved the Order dated 30.09.2021 the petitioner filed Departmental Appeal to the ASDO (Female) Peshawar for recalled of order dated 30.09.2021. **(Copy of departmental dated 12.10.2021 is attached as annexure "G").**
6. That during the said departmental period Mst. Gul-e-Rana was died due to his natural death and the petitioner was recalled from his own post at GGPS Samar Bagh Peshawar vide Office Endst No.1722-26 order dated 31.01.2022. **(Copy of Office Order dated 31.01.2022 is attached as annexure "H").**

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Deputy Registrar
11 MAR 2022

7. That on dated 01.02.2022 the Appellant took charge as PSHT at GGPS Samar Bagh Peshawar through vide Office Order Endst No.1722-26 dated 31.01.2022. **(Copy of Charge/Arrival report is attached as annexure "I")**.
8. That the petitioner was performing his duty on the said post but suddenly once again **after 10 days** impugned withdraw order No.2210-13 dated 10.02.2022 was passed. **(Copy of impugned Office order dated 10.02.2022 is attached as annexure "J")**.
9. That the feeling aggrieved from the action of the respondents the petitioner filed Departmental Appeal/representation on dated 02.03.2022 before the Secretary Elementary & Secondary Education i.e. respondent No.1 for cancellation of impugned order dated 10.02.2022 but in vain. **(Copy of Departmental Appeal dated 02.03.2022 are attached as annexure "K")**
10. That the chairman of Khyber Pakhtunkhwa Services Tribunal retired and till arrival of new chairman Services Tribunal now service Tribunal is not functional thus the petitioner is constrained to

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Deputy Registrar
11 MAR 2022

approach this Hon'ble Court while having no other adequate or efficacious remedy, hence, this writ petition on the following grounds amongst others

GROUND S:

- A. That the impugned Office Order 10.02.2022 is illegal, wrong, based on malafide, without cogent reasons based on political high handedness and fundamental rights of the Petitioner, hence liable to be struck down and reversed.
- B. That neither the Petitioner has committed any wrong nor has completed his tenure therefore, on this score alone the impugned transfer order needs to be reversed as it was purely made on malafide and intervention of the local politicians whereas it is high time that the trend of seeking interference and intervention of such like political figures be discouraged in line with the dictum so laid down by the superior judiciary.
- C. That there was no complaint or any other allegations against the petitioner and thus, without letting her to complete his tenure the

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Deputy Registrar

11 MAR 2022

petitioner was transferred, thus, on the face it, is sheer mala-fides.

- D. That, the transfer and posting policy approved by the competent authority says that all postings/transfers shall be strictly in public interest for **three years** and shall not be abused and misused to victimize the government servant however, most unfortunately, the government servants are always been made scapegoat so as to please the ruling party figures. It is important to mention the that the Petitioner had hardly completed 10 months tenure on the same post whilst transferred on the behest of the political leaders.
- E. That there are placement committees in different departments who recommend different officers to be posted and transferred against different posts but most unfortunately in case of the Petitioner none has been contacted and consulted about and all of a sudden in hasty and hefty manner impugned transfer order was issued.
- F. That the impugned notification has resulted into visible injustice to the Petitioner, as the impugned

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Deputy Registrar

11 MAR 2022

Office order dated 10.02.2022 has been passed without any legal or plausible justification, hence liable to be reserved and set aside on the aforementioned grounds.

- G. That the August Supreme Court of Pakistan has held in the case of Syed Mamood Akhtar Naqvi etc Vs Federation of Pakistan and others, reported as PLD 2013 Supreme Court 195 that matter of posting and transfer of civil servants cannot be allowed to be dealt with in an arbitrary manner.
- H. That the said respondent has got no authority whatsoever to issue such an illegal transfer order.
- I. That the respondents are travelling way beyond the scope and approach adopted for others thus the approach adopted for the Petitioner is in violation of the Article-10-A and 25 of the Constitution of Islamic republic of Pakistan, 1973.
- J. That the impugned order is without jurisdiction and is clearly a colorful exercise of authority.
- K. That even, otherwise, this Hon'ble Tribunal being the constitutional court of the province is vested

FILED TODAY
Deputy Registrar
19 MAR 2022

with the authority and jurisdiction to provide efficacious and appropriate remedy to the Petitioner.

- L. That neither any complaint is pending against the petitioner nor any such like show cause notice has been issued to the appellant
- M. That the said post at GGPS Samar Bagh, Peshawar is still vacant.
- N. That any other grounds will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore humbly prayed that on acceptance of this writ petition this Hon'ble Court may graciously be please to

- a) **Set aside the impugned Office Order issued by the respondents No.3 and 4 Endst. No.2210-13,dated 10.02.2022 and be declared as illegal, unlawful, without lawful authority and thus is of no legal effect and hence liable to be reversed and the petitioner may kindly be posted in**

FILED TODAY
Deputy Registrar
11 MAR 2022

her original position as PSHT at Samar Bagh Peshawar. Or

- b) Any other relief, not specifically prayed for in the circumstance of the case may also be passed in favour of the Petitioner.

INTERIM RELIEF

By way of interim relief the impugned Office Order Endst No.2210-13 dated 10.02.2022 may very graciously be suspended, and the petitioner may kindly be posted in her original position as PSHT at Samar Bagh Peshawar and the respondents may also be restrained from taking any kind of adverse action till the final disposal of the case.

V. (S) 19

Petitioner

Through

Malik Saqib Khan
Advocate High Court

Dated 10.03.2022

FILED TODAY
Deputy Registrar
11 MAR 2022

CERTIFICATE:

Certified on instructions of my client not such like Writ Petition has earlier been filed before this Hon'ble Court.

~~ADVOCATE~~

LIST OF BOOKS:

1. Constitution of Islamic Republic of Pakistan, 1973
1. Any other law books according to need

~~ADVOCATE~~

FILED TODAY
Deputy Registrar
11 MAR 2022

IN THE PESHAWAR HIGH COURT PESHAWAR

W.P No. 1000 P/2022

Mst. Nasira Bibi.....**Petitioner**

VERSUS

Govt. of Khyber Pakhtunkhwa through
Secretary E&SE Peshawar & & others.....**Respondents**

AFFIDAVIT

I, Mst. Nasira Bibi Wife of Arshad Javed, (Head Teacher) at GGPS Samar Bagh, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **writ petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identified by

(Signature)
Malik Saqib Khan
Advocate High Court

Nasira

DEPONENT ✓
CNIC No. 17301-~~2~~969877-6
Cell No.0332-9899985

FILED TODAY
(Signature)
Deputy Registrar
11 MAR 2022

5388
I do hereby solemnly affirm and declare on oath that the contents of the accompanying writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.
by of *March 22*
Arshad Javed
who was with
who is present
Nasira Bibi
Peshawar
Malik Saqib Khan
(Signature)
10/03/2022
Nadra verifies

Options

Reset Password

Logout



12/1

Online Service for verification of NADRA Identity Cards



Card Verification

Identity Card Number : 17301-2969877-6

Verification Date : March 10, 2022

[Start New Verification](#)

CNIC Verification

Card Status: **Verified**

Name: **نامبرہ بی بی**

Husband Name: **آرشد جاوید**

Gender: **مہورت**

Identification Mark: **جولہ برنگ**

Citizen Number: **17301-2969877-6**

DOB: **12-03-1980**

Issue Date: **03-03-2021**

Date of Expiry: **03-03-2031**

Card Type: **ID Card**

Old NIC: **13780687384**

Present Address: **بدهو (نظر باغ)، تحصیل و ضلع بساؤر**

Permanent Address: **بدهو (نظر باغ)، تحصیل و ضلع بساؤر**



IN THE PESHAWAR HIGH COURT PESHAWARW.P No. 1000P/2022Mst. Nasira Bibi.....**Petitioner****V E R S U S**Govt. of KPK through Secretary E&SE Peshawar & others
.....**Respondents****ADDRESSES OF THE PARTIES****PETITIONER:**Mst. Nasira Bibi Wife of Arshad Javed, Head Teacher GGPS
Samar Bagh, Peshawar**RESPONDENTS:**

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
3. District Education Officer (Female) District Peshawar
4. Deputy District Education Officer (Female) District Peshawar
5. District Account Officer (Female) Peshawar

Vas
Petitioner

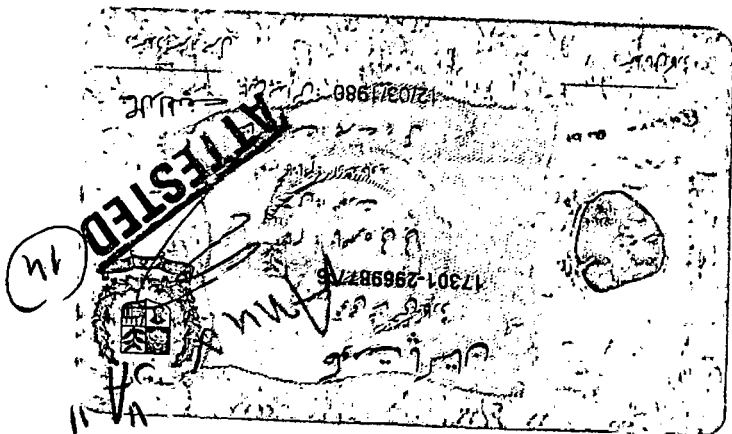
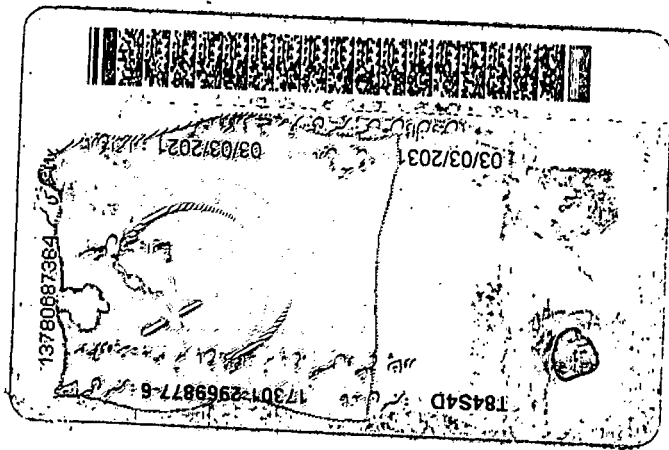
Through

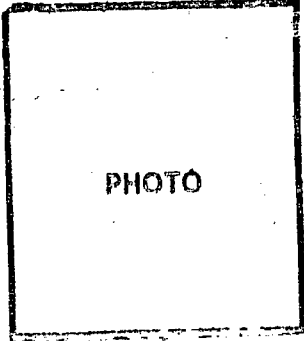
Dated 10.03.2022

Malik Saqib Khan
Advocate High Court

FILED TODAY
Deputy Registrar

11 MAR 2022





Anna Bⁿ (15)

DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in N.W.F.P having been born in this Province.

I was born at Village/Mohallah SAMMAR BAGA

Tehsil PESHAWAR District PESHAWAR

Nasira Bibi
Signature of the applicant

Date 15/7/1922

1048/PAT
167/92

Pursuant to the declaration dated 15/7/1922

filed by NASIRA BIBI SD of RAHIM BAKHSH

of Village SAMMAR BAGA Mohallah

domiciled in N.W.F.P. It is, hereby certified that the said NASIRA BIBI parents are permanent residents of the N.W.F.P. having born with in it.

I have satisfied myself from personal~~my~~ own knowledge / verification that the above declaration is true and certify accordingly.

Given under my hand and the seal of the Court.

this 16th day of July 19 22

[Signature]
MAGISTRATE 1ST CLASS
Magistrate 1st Class
Peshawar

ATTESTED

COUNTERSIGNED BY

[Signature]

DEPUTY COMMISSIONER

ATTACHED
[Signature]

Reader
to Addl. Commissioner,
Peshawar Division, Peshawar.

[Signature]
18/12/57

Handwritten Urdu text, possibly a list or report, with some lines crossed out. Includes the name 'M. Sharif' written vertically.

M. Sharif
The School
Peshawar

M. Sharif

Handwritten Urdu text at the bottom of the page, including the word 'میں' (Mein) and other characters.

Annex C

LEGIBLE COPY

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY PESHAWAR

16

APPOINTMENT

Consequent upon the selection by the Deputy Districts Selection Board/Committee the following PTC (Female) candidates are hereby appointed on contract base in BPS-07 @ Rs. 2220/- P.M plus usual allowances as admissible under the rules for three years w.e.from the date of their taking over charge in the school noted against each subject to the following terms and conditions:

S#	F#	Name of candidates with father name and address	Merit #	D/O Birth	Score	Posted at	Remarks
25% OPEN							
1	596	Dursamina D/o Sharif Khan R/o Bashir Abad Pajagi Road Peshawar	1	07.01.1981	63.01	GGPS Faqir Ghari	Against vacant post
2	180	Nagina D/o Imdad Hussain R/o H No 2171 Moh Tehlian Tehsil Gorghatri Peshawar	2	02.06.1978	60.92	GGPS Wazir Bagh No 1	-do-
3	20	Nusrat Begum D/o Khaista Gul R/o Moh Ijaz Abad Charsadda Road	3	14.03.78	60.65	GGPS Tauda	-do-
4	70	Robina Shaheen D/o Muhammad Ashiq Moh: Muslim Abad kakshal Peshawar	4	01.06.1967	60.24	GGPS Kakshal No 2	-do-
5	541	Neelum Shaheen D/o Lal Muhammad R/o Qtr No 27 D-IV Inventory Colony Farest College Peshawar	5	26.06.82	59.94	GGPS Regi No 3	-do-
6	115	Fouzia Tabassum D/o Pir Bakhsh R/o H-7/4 Street No 4 Pepal Colony Peshawar	6	07.01.1981	59.88	GGPS Nothia No 2	-do-
7	900	Maryam Bibi D/o Mian Hamzala Khan R/o Str No 2 Gulgash Colony Peshawar	7	11.05.1980	58.58	GGPS Nothia No 2	-do-
8	814	Nadia Nawaz D/o Haq Nawaz R/o Haryan Garh Peshawar	8	14.03.82	58.33	GGPS Garanga	-do-
9	487	Rizwana Nawaz D/o Muhammad Nawaz R/o Str No 4 Faisal Colony Dalazak Road Peshawar	9	19.03.73	58.14	GGPS Nasir Pur	-do-
10	377	Bushra D/o Arsalan Khan R/o Moh Afridi	10	02.06.1982	58.10	GGPS Wazir BAgH No 1	-do-

ATTESTED

LEGIBLE COPY

11	435	Halima Qureshi D/o Muhammad Zahir Qureshi R/o Almadin Str Yousaf Abad Dalazak Road Peashawar	11	03.01.1980	57.98	GGPS Daman Afghan	-do-	(17)
12	909	Janat Bibi D/o Rahim Gul R/o H No 533 Moh Kotla Sultan Gunj	12	04.10.1979	57.97	GGPS Ghari Qamar Din	-do-	
13	708	Nasira Bibi D/o Rahim bakhsh R/o Samar Bagh Peshawar	13	03.12.1980	57.936	GGPS Fatu Abdur Rahima	-do-	
14	595	Dure Nayab D/o Ali Khan R/o Bashir Abad Pajagi Road Peshawar	14	04.03.1981	57.78	GGPS Aza Khel No 2	-do-	
15	924	Sameen Ejaz D/o Ejaz Hussain R/o H No 4216 Moh Mooh Pura In Side Kabli Gate Peshawar	15	20.02.82	57.69	GGPS Pishta Khara No 1	-do-	
16	220	Zeenat Begum D/o Ghulam Yousaf R/o vil & PO Mathra Peshawar	16	25.12.61	57.64	GGPS Pir Bala	-do-	
17	322	Farzana Begum D/o Shair Hassan R/o Kotla Fibanan Chowk Shadi Pir Karim Pura	17	01.06.1981	57.64	GGPS Nasir Pur	-do-	
18	221	Shela Rahim D/o Rahim Dad Khan R/o Vill & PO Mathra Peshawar	18	03.03.1981	57.64	GGPS Haryana Payan	-do-	
19	373	Gul Naz D/o Syed Yasrab Shah R/o Vill Wadpaga Dalazad Road	19	17.06.82	57.42	GGCMS Mattani	-do-	
20	1076	Sadia Hamid D/o Abdul Hamid R/o sattar Shah Colony Dabgari Peshawar	20	05.08.1977	57.40	GGPS Sara Khola	-do-	
21	91	Naheed Akkhtar D/o Izzat Khan R/o New Garhi Bakhsi Pul Pesh	21	03.01.1979	57.53	GGPS Joganay	-do-	
22	413	Bakhtiara D/o Umra Daraz R/o Moh Baboo Khel vill & PO badber Peshawar	22	18.05.81	57.31	GGPS Adil Korona	-do-	
23	873	Shabana Begum D/o Abdul Qayum R/o Moh Marhaba Muslim Abad No 3 Kakshal Peshawar	23	30.10.74	57.19	GGPS Urma Bala No 2	-do-	


 ATTESTED

Dist No 2658-3217/Dated Peshawar the 12.11.2004

Copy of the above is forwarded for information and necessary action to the:-

18

1. PS to Minister Education NWFP.
2. PS to Secretary Schools & Literacy Department Govt of NWFP Peshawar.
3. PA to Director Schools & Literacy NWFP Peshawar
4. District Accounts Officer Peshawar with the request that the bills of the above named candidates may not be heard till the verification of fresh certificates/Degrees etc from the concerned authorities duly authenticated by the SDO concerned.
5. PSO to District Nazim City District Govt Peshawar.
6. PS to District Coordination Officer City District Govt Peshawar
7. Dy: District Officer concerned along with the Copy of annexure "A" (Agreement) with the request that to verify certificates / Degree etc personally from the concerned authorities and compare these with the merit list lying at the office to avoid any complication at the later stage filling with they will be personally held responsible for any mis-hapend. They are further directed to furnish a certificate that physical verification has been carried out and also mentioned in the certificates.

(A) Bogus case = Nil

OR

(B) Name of candidates with bogus certificate along with name of certificate / Degree and name of AD Exams / Board/ University etc in case of any bogus case

8-157 Head Master concerned.

158-20 All candidates concerned.

207-10 ADO (Estab) /ADO (Accounts) Supdt Estab branch concerned.

**EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY PESHAWAR**


ATTACHED

Annex C 11
(19)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY PESHAWAR.

Consequent upon the selection by the Departmental Selection Board / Committee the following PTC Trained (Female) candidates are hereby appointed on contract base in BPS 07 @RS. 2220/- P.M. plus usual allowances as admissible under the rules for three years w.e. from the date of their taking over charge in the school noted against each subject to the following terms and conditions:

S.#	F.#	Name of Candidates with Father Name and Address	Merit #	D/O Birth	Score	Posted at	Remarks
25 % OPEN							
1	598	Dursamina D/O Sharif Khan R/O Bashir Abad Pajagi Road Peshawar	1	07/01/1981	63.01	GGPS Faqir Ghari	Against Vacant Post
2	180	Nagina D/O Imdad Hussain R/O H No.2171 Moh Tehlan Tehsil Gorghatri Peshawa	2	02/06/1978	60.92	GGPS Wazir Bagh No.1.do.....
3	20	Nusrat Begum D/O Khaista Gul R/O Moh: Ijaz Abad Charsadda Road	3	14/3/78	60.65	GGPS Taudado.....
4	70	Robina Shaheen D/O Mohammad Ashiq Moh: Muslim Abad Katakhal Pesh	4	01/03/1967	60.84	GGPS Kakshai No.2, Quaid Abaddo.....
5	541	Neelum Shaheen D/O Lai Muhammad R/O Qtr No.37 d-IV Invenly Colony Forest College Peshawar	5	20/6/82	59.94	GGPS Ragi No.3do.....
6	115	Fouzia Tabassum D/O Pir Bakhsh R/O H-7/4 Street No.4 Pepal Colony Peshawar	6	07/01/1981	59.68	GGPS Norania No.2.do.....
7	900	Maryam Bibi D/O Mian Hamzala Khan R/O Str No 3 Gulgasht Colony Peshawar	7	11/05/1980	58.53	GGPS Norhia No.2.do.....
8	814	Nadia Nawaz D/O Haq Nawaz R/O Haryan Garhi Peshawar	8	14/3/82	58.43	GGPS Garangado.....
9	487	Rizwana Nawaz D/O Muhammad Nawaz R/O Str No 4 Faisal Colony Dalazak Road Peshawar	9	19/3/73	58.14	GGPS Nasir Purdo.....
10	377	Bushra D/O Arsalah Khan R/O Moh Afridi Khan Shahi Gabool Peshawar	10	02/06/1981	56.10	GGPS Wazir Bagh No.1.do.....

S.No. 13

11	435	Halima Qureshi D/O Muhammad Zahir Qureshi R/O Almadina STI Yousaf Abad Dalazak Road Peshawar	11	03/01/1980	57.89	GGPS Daman Afghanido....
12	909	Janat Bibi D/O Rahim Gul R/O H No.533 Moh Kotla Sultan Gulij	12	04/10/1979	57.97	GGPS Ghari Qamar Dindo....
13	708	Nasira Bibi D/O Rahim Bakhsh R/O Samar Bagh Peshawar	13	03/12/1980	57.96	GGPS Fatu Abdur Rahimado....
14	595	Dure Nayab D/O Ali Khan R/O Bashir Abad Pajagi Road Peshawar	14	04/03/1981	57.78	GGPS Aza Khel No.2.do....
15	924	Sameen Ejaz D/O Ejaz Hussain R/O H No.4216 Moh Mochi Pura In Side Kabli Gate Peshawar	15	20/2/82	57.69	GGPS Pishta Khara No.1do....
16	220	Zeenat Begum D/O Ghulam Yousaf R/O Vill & P.O Mathra Peshawar	16	25/12/81	57.64	GGPS Pir Balado....
17	322	Farzana Shaheen D/O Shair Hassan R/O Kotla Filbanan Chowk Shadi Pir Karim Pura	17	01/06/1981	57.57	GGPS Nasir Purdo....
18	221	Shela Rahim D/O Rahim Dad Khan R/O Vill & P.O Mathra Peshawar	18	03/03/1981	57.54	GGPS Haryana Payando....
19	373	Gul Naz D/O Syed Yasrab Shah R/O Vill Wadpaga Dalazak Road	19	17/6/82	57.48	GGCMS Mattanido....
20	1076	Sadia Hamid D/O Abdul Hamid R/O Sattar Shah Colony Dabgari Peshawar	20	05/05/1977	57.40	GGPS Sara Khorado....
21	91	Naheed Akhtar D/O Izzat Khan R/O Naw Carhi Bakhai Pull Pesh	21	03/01/1979	57.32	GGPS Joganaydo....
22	413	Bakhtiara D/O Umra Daraz R/O Moh Baboo Khel Vill & P.O Badber Peshawar	22	18/5/8	57.31	GGPS Adil Korunado....
23	873	Ghabana Begum D/O Abdul Qayum R/O Moh Marhaba Muslim Abad No.3 Kakshai Peshawar	23	30/10/74	57.10	GGPS Ummar Baia No.2do....

20

Endst. No. 2658-3217 / Dated Peshawar the 12/11/ /2004 Page No.1E

Copy of the above is forwarded for information and necessary action to the :-

- 1 PS to Minister Education NWFP
- 2 PS to Secretary Schools & Literacy Department Govt. of NWFP Peshawar.
- 3 PA to Director Schools & Literacy NWFP Peshawar.
- 4 District Accounts Officer Peshawar with the request that the bills of the above named candidates my not be honour till the verification of their certificates / Degrees etc: from the concerned authorities duly authenticated by the C.D.O. Government.
- 5 P.S.O to District Nazim Civil Dist. and Govt. Peshawar.
- 6 PS to District Coordination Officer Civil Dist. Peshawar.
- 7 Dy. District Officer concerned along with a copy of Annexure "A" (Agreement) with the request that to verify all original certificates / Degrees etc: personally from the concerned authorities and compare these with the merit list lying in the office to avoid any complication at the later stage filling with they will be personally held responsible for any mis-happen. They are further directed to furnish a certificate that physical verification has been carried out and also mentioned in the certificates :-

(A) :- Bogus case = Nil
OR

(B):- Name of Candidates with bogus certificate alongwith name of certificate / Degree and name of AD Exams / Board / University etc: in case of any bogus case.

- 8-157 Head Master concerned.
- 158-2(All candidates concerned.
- 207-1(ADO (Estab.) / ADO (Accounts) Supdt: Estab. branch concerned.


W. J. Gill
 EXECUTIVE DISTRICT OFFICER,
 SCHOOLS & LITERACY PESHAWAR.
 12/11/04

[Signature]
 ATTESTED

OFFICE ORDER

Consequent upon the recommendations of the Departmental Promotion Committee and approval of the competent authority. The District Education Officer (Female) Peshawar, in pursuance of the government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (B&A)/1-18/E&SE/2012 Dated 11.07.2012 & Finance Department Notification No. SO(FR/FD)/10-22(E/2010) Dated 16.07.2012 and Govt of KPK SO (PE4-5/SSRC/Meeting/2012/ Teaching Cadre) Dated 18.08.2017 the following Senior Primary School Teachers (SPSTs) BPS-14 are hereby promoted to the post of Primary School Head Teachers (PSHTs) BPS-15 (16120-1330-56020) @ Rs. 16120/- Plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Govt in teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each.

S No	Circle	Name of Town	Name of official	Present place of posting	Place of posting	Remarks
1	MATTANI	Town-4	Shahida Parveen	GGPS Aza Khel No 2	GGPS Garhi Nazar	AVP
2	CANNTT	Town-3	Gul e Rana	GGPS Lanul Abad 1	GPS Charkha Khel	AVP
3	CITY	Town-1	Nuzhat Bibi	GGPS Shah Jee Abad	GGPS Old Karim Pura	AVP
4	CITY	Town-1	Sadaf Afsheen	GGPS Dakki Shinawar Shah	GGPS Dhari Munawar Shah	AVP
5	II/ABAD	Town-3	Safia Begum	GGPS Hayatabad No 1	GGPS Dhari Munawar Shah	AVP
6	CITY	Town-1	Riffat Batool	GGPS Sattar Shah	GGPS Regi Model Town	AVP
7	C/PURA	Town-2	Amna Begum	GGPS Nasir Pur	GGPS Mohallah Islamabad	AVP
8	C/PURA	Town-2	Sabiha Amin	GGPS Chamkani No 3	GGPS Urmur Payan No 2	AVP
9	CITY	Town-1	Nizakat Nasim	GGPS Gulabad	GGPS Umar Atalad	AVP
10	C/PURA	Town-2	Akhtar Sultan	GGPS Chughul Pura	GGPS Surizai Bala	AVP
11	II/ABAD	Town-3	Zakihra un Nisa	GGPS Hayatabad	GGPS Dalazak	AVP
12	CANTT	Town-3	Sadia Bibi	GGPS Cantt No 2	GGPE Regi No 2	AVP
13	CITY	Town-3	Bushra Yasmeen	GGPS Quaid Abad	GGPS Garhi Fazal Rahim	AVP
14	CANTT	Town-3	Aneela Mehboob	GGPS Cantt No 1	GGPS Muslim Abd Khurkhyray	AVP
15	H/ABAD	Town-3	Khalida Jafreen	GGPS Islamia Collegiate	GGPS Cantt No 1	AVP
16	CITY	Town-1	Humaira Latif	GGPS Wazir Bagh No 2	GGPS Sufaid Sung	AVP
17	URMAR	Town-4	Safia Naz	GGPS Mera Kachori No 1	GGPS Kandi Marozai No 2	AVP
18	D/ZAM	Town-2	Musarrat Shaheen	GGPS Kukar	GGPS Rahi Banat	AVP
19	H/ABAD	Town-3	Riasat Begum	GGPS Badezai	GGPS Mewra	AVP
20	CANTT	Town-3	Shagufta Akbar	GGPS Railway QRts	GGPS Gujar Dhanda	AVP
21	CANTT	Town-3	Shaheen Akhtar	GGPS Tehkal Bala No 1	GGPS Khwaja Mir Killay	AVP
22	CITY	Town-1	Afsheen Shaheen	GGPS Asia Park	GGPS Kas Koroona	AVP
23	CANTT	Town-3	Roomi Laila	GGPS Dheri Baghbanan	GGPS Lalma Bazam Khan	AVP
24	D/ZAI	Town-2	Nihayat Gul	GGPS Khazana Payan	GGPS Shagm Mira	AVP
25	H/ABAD	Town-3	Zarsanga Bib	GGPS Palosi Piran	GGPS Shah Alam	AVP


OFFICER
 District Education Officer (Female)
 Peshawar

26	Mathra	Town-2	Amna Qazi	GGPS Parmagi	GGPS Bala	Tirai	AVP
27	D-Zai	Town-2	Romina Begum	GGPS Muslim Abad	GGPS Khatki	Hamd	AVP
28	Cantt	Town-3	Rubina Begum	GGPS Railway QTrs	GGPS Abad	Afridi	AVP
29	D. Zai	Town 2	Nasra Bibi	GGPS Sammar Bagh	GGPS Sammar Bagh		AVP
30	D. Der	Town 4	Rukhsana NAz	GGPS Badhber Horozai	GGPS Namdar Koroona		AVP
31	H/Abad	Town-3	Sajida	GGPS Malaakandher	GGPS Banda	Inzar	AVP
32	Mathra 1	Town2	Nadia Gul	GGPS Khat Killi	GGPS Khat Killi		AVP
33	Cantt	Town 3	Rashida Khanam	GGPS Dheri Badhbanan	GGPS Mera Badaber		AVP
34	H Abad	Town3	Zakia Begum	GGPS Hayatabad - 4	GGPS Qadeem	Bara	AVP
35	City	Town 1	Naveeda Afzal	GGPS Gul Abad	GGPS Abad	Khan	AVP

Terms and conditions:

1. Charge reports should be submitted to all concerned.
2. Necessary Entry to this effect should be made in their Service Books.
3. All undertaking should be obtained from the PSHTs concerned and will be recorded in their Service Books to the effect that if they wrongly promoted in the light of this order pointed out later on, will be reverted back and over payment made to them will be recovered from their pay, pension, gratuity etc.
4. Before handing over charge the said order may be verified from this office.
5. They should take charge of their posts within fifteen days after the date of issuance of this order otherwise their order will be considered cancelled.
6. No TA/DA etc is allowed.

(SAMINA GHANI)
District Education Officer
(Female) Peshawar

Endst No. 1594-1646/Estab-II/F. No. PSHT Promotion 2021 Dated 25.02.2021

Copy forwarded for information to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
3. Sub Divisional Education Officer (Female) Town-I, II, III & IV Peshawar.
4. Alla ASDEO ("F) Circle District Peshawar.
5. PSHTs concerned.

Dy. District Education Officer
(Female) Peshawar


ATTACHED
Alber



Ph.091-9225459

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR**OFFICE ORDER**

Consequent upon the recommendations of the Departmental Promotion Committee and approval of the competent authority, The District Education Officer (Female) Peshawar, in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (B&A) /A-18/E&SE/2012 Dated 11-07-2012 & Finance Department Notification No.SO(FR/FD/10-22(E/2010) Dated 16-07-2012 and Govt of KPK SO (PE4-5/SSRC/Meeting/2012/ Teaching cadre) Dated 18-08-2017 the following Senior Primary School teachers (SPSTs) BPS-14 are here by promoted to the post of Primary School Head Teachers (PSHTs) BPS-15 (16120-1330-56020) @Rs.16120/- Plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt, in teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each.

S. No.	Circle Name	Name of Town	Name of Official	Present Place of Posting	Place of Posting	Remarks
1	BATTANI	TOWN 4	SHAHIDA FARVEEN	GGPS AZA KHEL NO.2	GGPS GARIH NAZAR DAD	AVP
2	CANTT	TOWN 3	GUL E RANA	GGPS LANDI ABBAD I	GGPS CHARKHAR KHEL	AVP
3	CITY	TOWN 1	NUZHAT BIBI	GGPS SHAI JEE AHAD	GGPS OLD KARIM PURA	AVP
4	CITY	TOWN 1	SADAF AFSHEEN	GGPS DAKKI MUNAWAR SHAI	GGPS DHAKI MUNAWAR SHAI	AVP
5	III/ABAD	TOWN 3	SAFIA BEGUM	GGPS HAYATABAD NO.1	GGPS REGI MODEL TOWN	AVP
6	CITY	TOWN 1	RIFFAT BATOOL	GGPS SATTAR SHAI	GGPS MOHALLAI ISLAMABAD	AVP
7	CPURA	TOWN 2	AMNA BEGUM	GGPS NASIR PUR	GGPS URMAR PAVAN.2	AVP
8	CPURA	TOWN 2	SABIHA AMIN	GGPS CHANIKANI NO.3	GGPS UMAR ATALAD	AVP
9	CITY	TOWN 1	NIZAKAT NASIM	GGPS GUL ABAD	GGPS SUHIZAI BALA	AVP
10	CPURA	TOWN 2	ABBITAR SULTAN	GGPS CHUGHAL PURA	GGPS DALAZAK	AVP
11	II/ABAD	TOWN 3	ZAKIHA UN NISA	GGPS HAYATABAD NO.1	GGPS REGI NO.2	AVP
12	CANTT	TOWN 3	SADFA BIBI	GGPS CANTT NO.2	GGPS GARIH FAZAL TAHIM	AVP
13	CITY	TOWN 1	BUSIIRA YASMEEN	GGPS QUAIR ABAD	GGPS MUSLIM ABAD KHURKHURAY	AVP
14	CANTT	TOWN 3	ANEELA MEHBOOB	GGPS CANTT NO.1	GGPS CANTT. NO.1	AVP
15	II/ABAD	TOWN 3	KHALIDA JAFREEN	GGPS ISLAMIA COLLEGIATE	GGPS SUFAID SUNG	AVP
16	CITY	TOWN 1	HUMAIRA LATIF	GGPS WAZIR BAGH NO.2	GGPS KANDI MAROZAI NO.2	AVP
17	URMAR	TOWN 4	SAFIA NAZ	GGPS MERA KACHORI NO.1	GGPS GARIH BANAT	AVP
18	D/ZA I	TOWN 2	MUSARRAT SHAIHEEN	GGPS KUKAR	GGPS MEWRA	AVP
19	II/ABAD	TOWN 3	RIASAT BEGUM	GGPS BADEZAI	GGPS GUJAR DIANDA	AVP
20	CANTT	TOWN 3	SHAGUFTA AKBAR	GGPS RAILWAY QRTS	GGPS KHAWAJA MIR KILLAY	AVP
21	CANTT	TOWN 3	SHAIHEEN AKHTAR	GGPS TEHKAL BALA NO.1	GGPS KAS KORONA	AVP
22	CITY	TOWN 1	AFSHAN SHAIHEEN	GGPS ASIA PARK	GGPS LALMA RAZAN KHAN	AVP
23	CANTT	TOWN 3	ROOMI LAILA	GGPS DHIRI BACHIDANAN	GGPS SHAGAI AHRA KHAN	AVP
24	D/ZA I	TOWN 2	NHAYAT GUL	GGPS KHAZANA PAVAN	GGPS SHAI ALAM	AVP
25	III/ABAD	TOWN 3	ZARSANGA BIBI	GGPS PALOSI PIRAN	GGPS FOREST COLLEGE	AVP

Annex "ED"

(23)



Ph. 091-9225459

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

24

27	MATIRA	TOWN 2	SAMINA QAZI	GGPS DARMANGI	GGPS TIRAI DALA	AVP
28	H. ABAD	TOWN 2	RIBINA BEGUM	GGPS MUSEJHABAD	GGPS MAMO KHATKI	AVP
29	CANTT	TOWN 3	RIBINA BEGUM	GGPS RAILWAY QRTS	GGPS AFRIDI ABAD	AVP
30	H. ABAD	TOWN 2	NASRA DIDI	GGPS SAMIAR BAGH	GGPS SAMIAR BAGH	AVP
31	K. THER	TOWN 4	RUKHSANA NAZ	GGPS BABBUR HOROZAI	GGPS NAMBAR KOROONA	AVP
32	H. ABAD	TOWN 3	SAJIDA	GGPS MALAKANDHER	GGPS INZAR BANDA	AVP
33	MATIRA	TOWN 2	NADIA GIL	GGPS KHAT KILLI	GGPS KHAT KILLI	AVP
34	CANTT	TOWN 3	RASHIDA KHANUM	GGPS DEIRI BAGHRANAN	GGPS MERA BADABER	AVP
35	H. ABAD	TOWN 3	ZAKIA BEGUM	GGPS HAYAT ABAD 4	GGPS BARA QADEEM	AVP
36	CITY	TOWN 1	NAVTEEDA ATZAI	GGPS GUL ABAD	GGPS KILAN ABAD	AVP

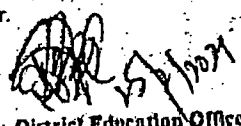
TERMS AND CONDITIONS:

1. Charge Reports should be submitted to all concerned.
2. Necessary Entry to this effect should be made in their Service Books.
3. An undertaking should be obtained from the PSHTs concerned and will be recorded in their Service Books to the effect that if they wrongly promoted in the light of this order pointed out later on, will be reverted back and over payment made to them will be recovered from their pay, pension, gratuity etc.
4. Before handing over charge the said order may be verified from this Office.
5. They should take charge of their posts within fifteen (15) days after the date of issuance of this order, otherwise their order will be considered cancelled.
6. No TA, / DA etc. is allowed.

(SAMINA GHANI)
District Education Officer
(Female) Peshawar

Encl. No. 1594 - 1646 / Estab-11/F.No. PSHT Promotion 2021 Dated. 25 / 02 / 2021
Copy Forwarded for information to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
3. Sub-Divisional Education Officer (Female) Town-I, II, III & IV Peshawar.
4. All ASDEO (F) Circle District Peshawar.
5. PSHTs Concerned.


Dy. District Education Officer
(Female) Peshawar

ATTESTED

[Handwritten signature]

~~Signature~~

Date: 26-2-2021

BPS: 15

PSHT Samar Bagh

HEAD MISTRESS
GGPS Samar Bagh
26-02-2021

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کے لئے رجسٹرڈ ہے۔ - Ends No. 1594 - 1646

کے لئے رجسٹرڈ ہے۔ - Ends No. 1594 - 1646

26-02-2021 کو رجسٹرڈ ہے۔ BPS: 15

BPS: 14 کے لئے رجسٹرڈ ہے۔ اس کے لئے رجسٹرڈ ہے۔

رجسٹرڈ ہے

(25)

Annex
=

(2)

Annex "F"
26



OFFICE OF THE DISTRICT EDUCATION OFFICER (F) PESHAWAR.

OFFICE ORDER:-

- 1- On return from leave Mst. Gul-e-Rana PSHT is hereby adjusted at GGPS Samar Bagh Peshawar against her original post.
- 2- Mst. Nasira Bibi PSHT GGPS Samar Bagh Peshawar (Now Surplus) is hereby adjusted at GGPS Essa Khel Hameed against vacant post w.e.f. 01-09-2021.

District Education Officer (F),
Peshawar

Endst No. 522-25 /Etab-II/Complaint F.2

Dated 30/9/2021

Copy forwarded for information to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- SDEO (F) Town-II Peshawar with reference to her letter No.2265 dated 21-09-2021.
- 3- ASDEO (F) Circle Concerned.
- 4- PSHT Concerned.
- 5- Master File.

M. Nasir
29/9/21

District Education Officer (F),
Peshawar

مستور

[Signature]

ATTESTED

12-10-2021

PRST

پاکستان

آئی ڈی

الکھٹا

عین ایشیا

ATTESTED

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مذکورہ آرڈر وائس ایس ایس کے تحت جاری ہے۔

اس کے تحت جاری ہے۔ اس کے تحت جاری ہے۔

اور مذکورہ آرڈر وائس ایس ایس کے تحت جاری ہے۔

اس کے تحت جاری ہے۔ اس کے تحت جاری ہے۔

مذکورہ آرڈر وائس ایس ایس کے تحت جاری ہے۔

مذکورہ آرڈر وائس ایس ایس کے تحت جاری ہے۔

مذکورہ آرڈر وائس ایس ایس کے تحت جاری ہے۔

مذکورہ آرڈر وائس ایس ایس کے تحت جاری ہے۔

Amnt

(97)

5



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.**

Annex "H"

Annex "G"

28

OFFICE ORDER

Consequent upon the approval given by competent Authority, District Education Officer (Female) Peshawar, Mst: Nasira Bibi PSHT is here by retained at GGPS Samar Bagh Peshawar against vacant post of PSHT in the best interest of public service with immediate effect, and the adjustment order issued vide this office Endst No: 522-25 Dated: 30-09-2021 is here by withdrawn.

Note: Charge / Compliance report should be submitted to all concern.

(SAMINA GHANI)
District Education Officer
(Female) Peshawar

Endst No: 1722-26 / Etab-II/ Appeal Regarding Promotion Dated: 31 / 01 / 2022
Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. DMO EMA Peshawar.
3. SDEO (F) Town - II Peshawar.
4. Assistant Programmer Local Office.
5. Official Concerned.

Dy: District Education Officer
(Female) Peshawar

[Signature]
ATTESTED

01-02-2022 مورخہ

ATTESTED

[Handwritten signature]

HEAD MISTRESS
GOPS SCHOOL

عائشہ بیگم

ناقصہ خانہ

[Handwritten signature]

پرائمری اسکول

الہ آباد

جس کے لئے اس کے لئے ہے

سنگھالی سہولت کے لئے 01-02-2022 مورخہ

Endst No 1722-26 مورخہ 01-02-2022

میں نے اس کے لئے ہے

مورخہ 01-02-2022

عائشہ بیگم

مورخہ 01-02-2022

(29)

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(4)

Annex J

Annex H

(30)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.**

OFFICE ORDER

Office order issued vide this office Endst. No 1722-26 dated 31-01-2022 regarding adjustment of Mst. Nasira Bibi PSHT GGPS Samar Bagh Peshawar is hereby withdrawn with immediate effect in the best interest of public.

Note: Necessary entry to this effect should be submitted her Service Book.

(SAMINA GHANI)
District Education Officer
(Female) Peshawar

Endst No. 2210-13 / Etab-II/ Appeal Regarding Promotion Dated: 15/02/2022

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. DMO EMA Peshawar.
3. SDEO (F) Town - II Peshawar.
4. Assistant Programmer Local Office.
5. Official Concerned.

Dy: District Education Officer
(Female) Peshawar

ATTESTED

محکور جناب سیکرٹری صاحب محکمہ ابتدائی و ثانوی تعلیم خیبر پختونخوا پشاور

عنوان ایضاً

محکمہ ایجنٹ ہمارا منگنی حکم نامہ نمبر 13-2210-2022 مورخہ 10-02-2022 جسکی وجہ سے سالانہ کولہا ایچ و بلا ضابطہ GGPS ٹر باغ (Mother Home) سے غیر قانونی طور پر انسٹر کر کے GGPS سکول ایسی خیل میدہ تیناٹ کیا گیا ہے۔ (ایک سال میں دو آڈر)۔
جناب عالی! گزارش حسب ذیل ہے۔

- 1 یہ کہ سالانہ گاؤں بدھو ٹر باغ ضلع پشاور کی رہائش ہے جو بطور ثبوت نقل شناختی کارڈ اول نقل ڈیو ایس ایل سرٹیفکیٹ ایف ہے۔
- 2 یہ کہ سالانہ کی یونین کونسل ہذا میں بطور PTC ٹیچر Appointment سال 2004 میں ہوئی اور سالانہ پچھلے کئی سالوں سے GGPS ٹر باغ میں اپنے فرائض انجام دے رہی ہے۔
- 3 یہ کہ سال 2021ء میں حکم نامہ نمبر 1594-1646 مورخہ 25-02-2021 کو سالانہ کی پرموشن بطور PSHT (BPS-15) ہوئی اور سالانہ کو پالیسی کے مطابق سکول ہذا میں تہیناٹ کر دیا گیا۔ اور سالانہ نے حکم کی تعمیل کرتے ہوئے 26-02-2021 کو چارج سنبھال لیا (کاپی چارج رپورٹ اور حکم ہذا لف ہے)
- 4 یہ کہ نامعلوم وجوہات کی بنا پر ضابطہ کی خلاف ورزی کرتے ہوئے مورخہ 30-09-21 کو سالانہ کا تبادلہ سالانہ کے علاقے سے کافی دور GGPS ایسی خیل حمید کر دیا گیا۔ (کاپی لف ہے)
- 5 یہ کہ سالانہ نے مورخہ 12-10-21 کو اپیل برائے منتخج تبادلہ جمع کروائی (کاپی لف ہے)
- 6 یہ کہ سہ ماہی رانا جس کو GGPS ٹر باغ میں پوسٹ کیا گیا تھا۔ اسی دوران وفات پائی۔ اور سالانہ کو ایک مرتبہ پھر بذریعہ حکم نامہ نمبر 1722-26 مورخہ 31-01-22 واپس GGPS ٹر باغ میں بطور Retained BPS-15 PSHT کر دیا گیا۔ سالانہ نے حکم کے مطابق اپنا چارج سنبھال لیا مگر اسی دوران محض دس دن بعد بغیر کسی وجہ اور بلا ضابطہ سالانہ کا آڈر ہذا withdraw کر دیا گیا۔ (کاپی لف ہے)
- 7 یہ کہ سالانہ کو عورت ہونے کے ناطے ایک ہی سال میں کئی بار ہونے والے تبادلوں کی وجہ سے شدید ذہنی کوفت کا سامنا کرنا پڑ رہا ہے اور طالبات کے حصول علم و تعلیم پر بھی برا اثر پڑ رہا ہے۔
- 8 یہ کہ مذکورہ فرانسفر آڈر کے تحت تعلیم کی فرانسفر پالیسی کے بھی خلاف ہے جو پالیسی ہذا کے مطابق کسی بھی معلم / معلمہ کا ایک شیفت کا دورانیہ 3 سال ہے۔
- 9 یہ کہ سالانہ ایک شادی شدہ خاتون ہے اور سالانہ 8 ماہ کی ایک بیٹی کی ماں ہے۔

لہذا استدعا ہے کہ منظوری محکمہ ایجنٹ ہمارا منگنی حکم نامہ نمبر 13-2210-2022 مورخہ 10-02-22 کو منسوخ فرمایا جا کر حکم نامہ نمبر 1722-26 مورخہ 31-01-22 کو بحال رکھا جا کر درسی بخشا جاوے

الرقوم 2022-03-01

SECRETARY DIARY

No.

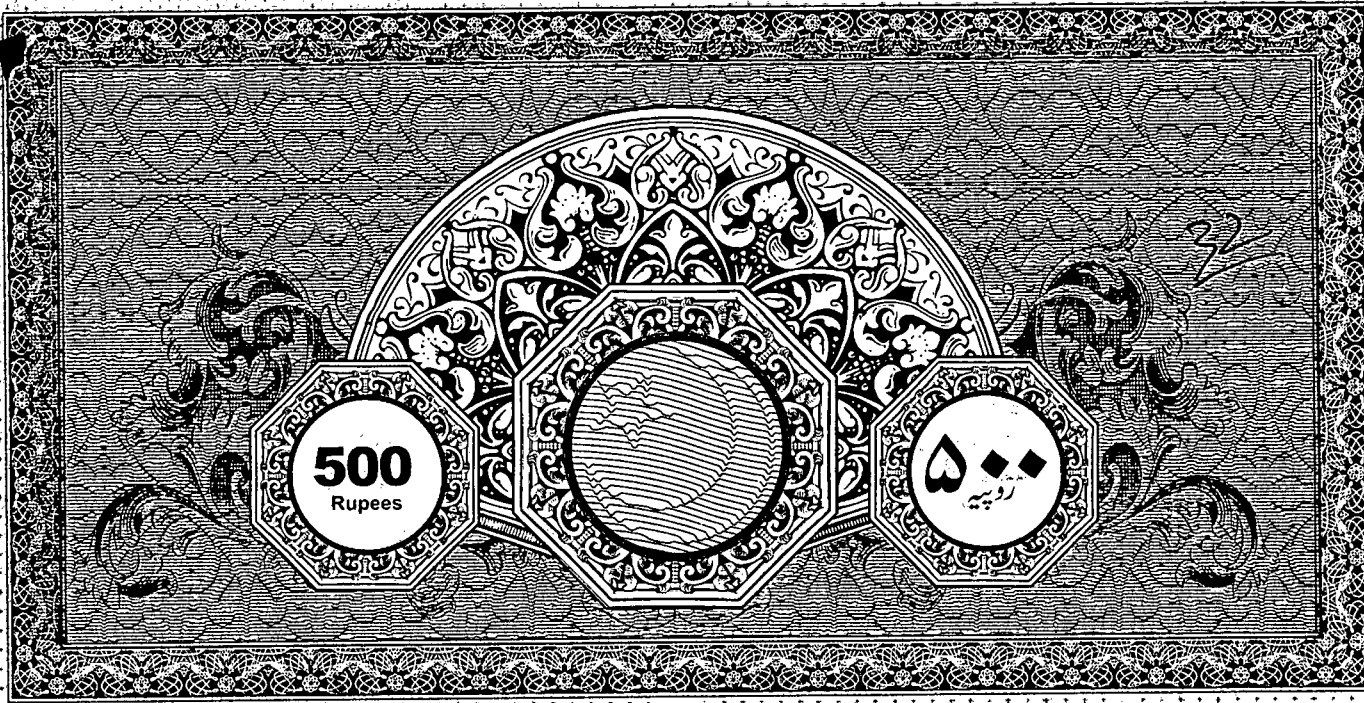
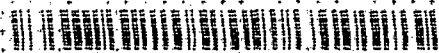
1471

Dated

10/3/22

سالانہ
صاحبتہ صرہ بی بی زہرا شہدادیہ
ایجنٹ GGPS ٹر باغ پشاور
موبائل 0332-9833385

ATTESTED



PAKISTAN COURT FEE

کمرہ عدالت، سید احمد علی شاہ، لاہور

عین
CANCELLATION

11 MAR 2022

سید ناصر علی بنام حکومت

(105) ۷۹
بنام سید ناصر علی

FILED TODAY
Deputy Registrar
11 MAR 2022

[Handwritten signature]

105-
Miss
Proc

District Comptroller of Accounts
08 MAR 2022
Treasury (1770) Post Office

11/22

وکالت نامہ

بعدالت پشاور ہائی کورٹ پشاور

	S No	6032
	BC No	14-4618
	Sign	
	THIRTY RUPEES	

مورخہ
 مقدمہ
 دعویٰ
 جرم
 33

۲۰۲۲ء منجانب سہ
 سہ ماہہ ناصر وہاں بنام حکومت پاکستان
 باعث تحریرے آنکہ

۸۳۵۵-۷۵۶۷
 ۱۶۳۵۷-۹۵۶۷
 ۱۹۵۰

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطہ پیروی و جواب دہی وکل کاروائی، متعلقہ
 آن مقام کیلئے کسٹڈین شہناز اختر کی طرف سے دائر کی گئی ہے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ وکیل موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار حاصل ہوگا۔

نیز وکیل صاحب کو عرضی دعویٰ داخل کرنے، جواب دعویٰ، اپیل، نظر ثانی کا بھی اختیار حاصل ہو
 گا نیز وکیل صاحب بصورت ڈگری برخلاف من اختیار دہندہ اپیل، نگرانی، نظر ثانی از عدالت ابتداء
 تا عدالت انتہا یعنی سپریم کورٹ آف پاکستان دائر کر سکتا ہے وکیل موصوف بصورت عدم پیروی
 کاروائی یکطرفہ یا ڈگری یکطرفہ کیخلاف درخواست دائر کر سکتا ہے اور وکیل موصوف میری جانب
 سے مقدمہ میں بصورت ڈگری چیک یا نقد روپیہ کی شکل میں وصولی کر سکے گا اور مزید یہ کہ وکیل
 موصوف مقدمہ متذکرہ کی کل یا جزوی کاروائی کیلئے اپنی بجائے دیگر وکیل بھی اپنے ساتھ مقرر کر سکتا
 ہے جس کو بھی وہ جملہ اختیار حاصل ہونگے جو کہ وکیل موصوف کو حاصل ہیں مجھے اس صورت میں
 تمام ساختہ پرداختہ منظور و قبول ہوگا لہذا میں نے وکالت نامہ ہذا تحریر کر کے اس پر دستخط نشان

FILED TODAY

Deputy Registrar

11 MAR 2022

2022

المرقوم ۱۵

ATTESTED

بمقام



کے کے منظور ہے۔

ATTESTED