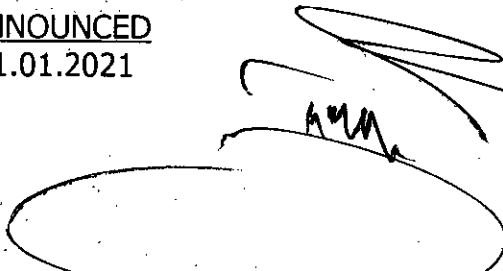



21.01.2021

Learned counsel for the appellant and Muhammad Rasheed,
learned Deputy District Attorney for respondents present.

Vide our detailed judgment of today of this Tribunal placed on file,
the present service appeal is dismissed with no orders as to costs. File be
consigned to record room.

ANNOUNCED
21.01.2021


(MUHAMMAD JAMAL KHAN)
MEMBER (J)

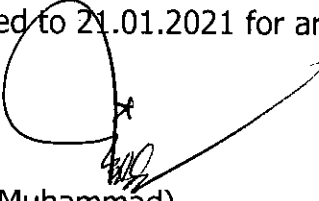

(ATIQ UR REHMAN WAZIR)
MEMBER (E)


13.11.2020

Junior to counsel for appellant present.

Muhammad Jan learned Deputy District Attorney alongwith
Khan Muhammad Assistant for respondents present.

Lawyers are on general strike, therefore, case is
adjourned to 21.01.2021 for arguments, before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

10.4.2020


Due to COVID19, the case is adjourned to
9/7/2020 for the same as before.


Reader

08.07.2020

Counsel for the appellant and Mr. Muhammad Jan, DDA
alongwith Attiqur Rahman, Dy. DEO for the respondents present.

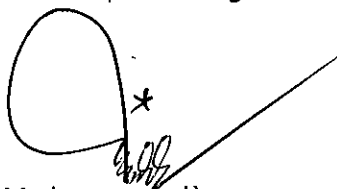
Former requests for time to submit rejoinder regarding
comments furnished by the respondents. Instant matter is,
therefore, adjourned to 03.09.2020 for arguments before the
D.B. The appellant may furnish rejoinder within a fortnight but
as last chance.

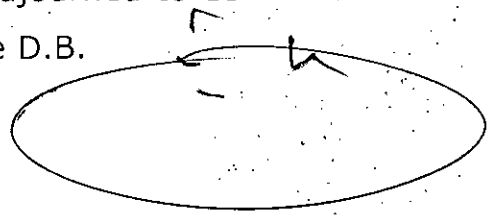

Member (E)


Chairman

03.09.2020

Learned counsel for the appellant is present. Mr. Riaz
Ahmad Paindakheil, Assistant Advocate General for the
respondents is also present. Learned counsel for the
appellant is seeking adjournment. Adjourned to 13.11.2020.
File to come up for arguments before D.B.


(Mian Muhammad)
Member (Executive)


(Muhammad Jamal Khan)
Member (Judicial)

15.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant appeal is adjourned to 04.03.2020 for further proceedings/arguments before D.B.



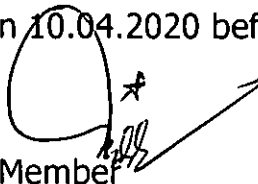
Member



Member

04.03.2020

Counsel for the appellant present. Addl: AG for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 10.04.2020 before D.B.



Member



Member

28.08.2019

Nemo for the parties.

Fresh notices be issued to appellant as well as respondents.
To come up for written reply/comments on 25.09.2019 before
S.B.

Chairman



25.09.2019

Mr. Muhammad Ishaq, brother of appellant and Addl. AG
alongwith Hameedullah, Senior Clerk for the respondents
present.

Reply on behalf of respondents furnished which ~~are~~^{is} placed
on record. The appeal is assigned to D.B for arguments on
20.11.2019. The appellant may submit rejoinder, within a
fortnight, if so advised.

Chairman



20.11.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil,
Assistant AG for the respondents present. Learned counsel for the
appellant requested for adjournment. Adjourned to 15.01.2020 for
rejoinder and arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

11.04.2019


Appellant in person and Addl. AG alongwith Umar Khan, Superintendent for the respondents present.

Representative of respondents requests for further time. Adjourned to ¹⁷21.05.2019 for submission of written reply.


Chairman

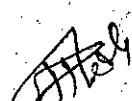
17.05.2019

Clerk to counsel for the appellant present. Written reply not submitted. Hamid Ullah Khan S.C representative of respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 02.07.2019 before S.B.


Member

02.07.2019

Appellant ~~absent~~ present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Omer Khan Superintendent representative of the respondents present and seeks time to furnish written reply/comments. Adjourned. To come up for written reply/comments on 28.08.2019 before S.B.


Member

Service Appeal No. 997/2017

01.02.2019

Counsel for the appellant present and requested for adjournment.

Adjourned to 05.03.2019 for preliminary before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

05.03.2019

Counsel for appellant Mumtaz Begum present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Certified Teacher in the year 1981 and performed her duty till 2003. She became ill and submitted application for leave but the same was not considered. It was further contended that on attaining the age of superannuation she filed service appeal for pensionary benefits but the respondent-department on 07.02.2018 submitted/produced her removal from service order dated 22.07.2005 therefore, this Tribunal dismissed the said service appeal of the appellant in limine vide order dated 07.02.2018 however, on the same day i.e 07.02.2018 when the appellant came to know that she has been removed from service by the competent authority, she filed departmental appeal on 05.03.2018 which was not responded hence, the present service appeal on 30.05.2018 Learned counsel for the appellant further contended that before passing the impugned order of removal from service of the appellant neither any absence notice was issued to the appellant nor inquiry proceeding was conducted and the appellant came to know about impugned order on 07.02.2018 therefore, this service appeal is within time and the impugned order is illegal and liable to be set-aside.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 11.04.2019 before S.B.

Appellant Deposited
Security & Process Fee


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

18.07.2018

Counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 29.08.2018 before S.B.


(Ahmad Hassan)
Member


29.08.2018

None present on behalf of the appellant. Adjourned. To come up for preliminary hearing on 04.10.2018 before S.B.


(Muhammad Amin Khan Kundi)
Member


04.10.2018

Clerk of the counsel for appellant present and requested for adjournment. Adjourned. To come up for preliminary hearing on 08.11.2018 before S.B.


(Muhammad Amin Khan Kundi)
Member

8-11-2018

*Due to Retirement of Honorable
Chairman the Tribunal is non
functional therefore the case is
adjourned to come up for the same
on 27-12-2018*


Reader

27.12.2018

Clerk to counsel for the appellant present and seeks adjournment as learned counsel for the appellant not in attendance. Adjourn. To come up for preliminary hearing on 01.02.2019 before S.B.

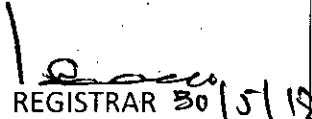



Member

Form -A

FORM OF ORDER SHEET

Court of _____

Case No. 757/2018

S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	<p>30/05/2018</p> <p>31/05/18.</p> <p>12.06.2018</p>	<p>The appeal of Mr. Mumtaz Begum presented today by Mr. Hassan U.K Afridi Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.</p> <p style="text-align: right;">  REGISTRAR 30/5/18 </p> <p>The case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/06/18.</u></p> <p style="text-align: right;">  CHAIRMAN </p> <p>Agent to counsel for the appellant present and made a request for adjournment as counsel for the appellant is busy in the Hon'ble High Court and not in a position to attend this Tribunal. To come up for preliminary hearing on 18.07.2017 before S.B.</p> <p style="text-align: right;">  Chairman </p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 757/2018

Date of Institution: 30.05.2018

Date of Decision: 21.01.2021

Mr. M. Antaz Begum, C.T Government Girls High School Shakardara Kohat.
... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education, Civil Secretariat and four other.
... (Respondents)

Mr. Hassan U.K Afridi
Advocate
... For Appellant

Muhammad Rasheed,
Deputy District Attorney
... For Respondents

Mr. MUHAMAMD JAMAL KHAN
Mr. ATIQ UR REHMAN WAZIR
... MEMBER (J)
... MEMBER (E)

JUDGMENT: -

Mr. ATIQ UR REHMAN WAZIR: - Brief facts of the case are that the appellant served as teacher in Government High School Shakardara Kohat from 23-09-1981 until 15-10-2003. The appellant remained absent from duty for a longer time, hence was proceeded against under Removal from Service (Special Powers Ordinance) 2000 and ultimately removed from service dated 22-07-2005, against which the appellant filed departmental appeal at a belated stage dated 05-03-2018, which was not responded to, hence the instant appeal with prayers that the impugned order dated 22-07-2005 may be set aside and the appellant be re-instated for pensionary benefits.

02. Written reply/comments were submitted by respondents.

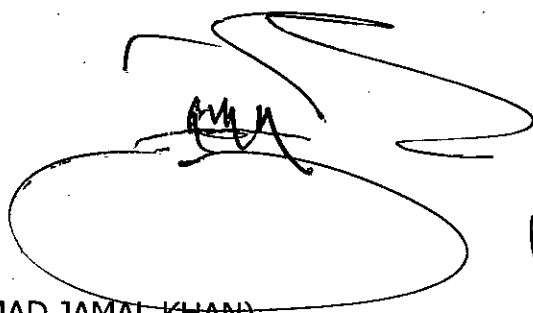
03. Arguments heard and record perused.

after fulfilling all the codal formalities. The learned Deputy District Attorney prayed that the instant appeal is not maintainable, hence may be dismissed.

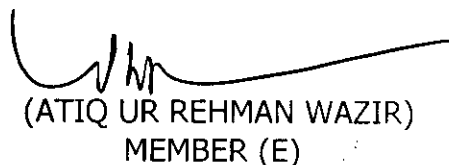
06. We have heard learned counsel for the parties and perused the record. Record reveals that the appellant has a long history of obtaining leave under various pretexts and after exhausting all options, she absented herself for longer period of time, compelling the respondents to publish notices in newspapers as well as sending notices at her home address, but she did not turned up. We did not notice any lapse on part of the respondents in the process of disciplinary proceedings, as she was afforded every opportunity of defense, but she displayed least interest. On the question of limitation, both the parties put forth pro and contra judgments of the apex court, which also hold force, but the question of limitation or its condonation would weigh more if merit of the case is kept in mind. The instant case being otherwise devoid of merit would definitely hit by limitation.

07. In view of the situation, the instant appeal is dismissed with no orders as to costs. File be consigned to record room.

ANNOUNCED
21.01.2021



(MUHAMMAD JAMAL KHAN)
MEMBER (J)



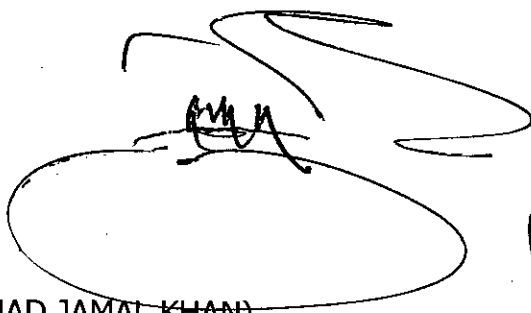
(ATIQ UR REHMAN WAZIR)
MEMBER (E)

after fulfilling all the codal formalities. The learned Deputy District Attorney prayed that the instant appeal is not maintainable, hence may be dismissed.


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ANNOUNCED
21.01.2021



(MUHAMMAD JAMAL KHAN)
MEMBER (J)



(ATIQ UR REHMAN WAZIR)
MEMBER (E)

04. Learned counsel for the appellant contended that the appellant was removed from service vide impugned order dated 22-07-2005, but her absence was not willful but was due to her health conditions. That she requested again and again for leave on medical grounds, but no heed was paid. He further added that the appellant was removed from service without legal course, as no proper inquiry was conducted, nor other formalities fulfilled. On the question of limitation the learned counsel relied on judgments of the apex court in 2004 SCMR 527, 1997 SCMR 287 and 2004 PLC (CS) 821, where if departmental appeal filed by civil servant is not disposed of by any order in writing holding the same as barred by time, the question of condonation or otherwise in filing departmental appeal did not arise. The learned counsel prayed that since the appellant has already attained the age of superannuation, so keeping in view her long service career as well as sympathetic considerations, she may be re-instated for the purpose of pensionary benefits.

05. Learned Deputy District Attorney appeared on behalf of official respondents without touching the merits of the case contended that the instant appeal is badly time barred, as the appellant preferred her departmental appeal after 15 years of her removal from service and when the departmental appeal is time barred, the service appeal before Tribunal is not competent. Reliance was placed on 2007 SCMR 346, 2004 SCMR 1426, PLJ 2009 SC 1099, PLD 2006 SC 572, CP 1706/2018 SC, Service Appeal No. 381/2019 and Service Appeal No. 1662/2013. He further added that the appellant has not preferred any appeal for condonation of delay. To rebut the contention of the counsel for the appellant, the learned Deputy District Attorney argued that the appellant during the period from 1981 until 2001 availed more than one thousands days leave on one pretext or the other and after 2001, she started absenting willfully without mentioning any reason. She was warned again and again but she did not turn up. Finally, she was proceeded against under RSO 2000 and rightly removed from service

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 757/2018

Mumtaz Begum.....Appellant

V E R S U S

Government of Khyber Pakhtunkhwa
Through Chief Secretary E&SE & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-6
2.	Affidavit		7
3.	Addresses of parties		8
4.	Service book		9-24
5.	Previous Departmental Appeal dated 27.02.2017		25
6.	Previous service appeal		26-28
7.	Impugned order 22.07.2015		29
8.	Letter dated 2008		30
9.	Departmental Appeal 05.03.2018		31-32
10.	Medical documents		33-42
11.	Wakalatnama		43

Appellant

Through

Dated 29.05.2018

Hassan U.K Afridi
Advocate High Court
Cell No.0300-9151963

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 757 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1017

Dated 30-5-2018

Mumtaz Begum, C.T, Government Girls High School,
Shakar Darra, Kohat.....**Appellant**

V E R S U S

1. Government of Khyber Pakhtunkhwa through Chief Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. ✓ Director Elementary & Secondary Education, Peshawar
3. ✓ District Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
4. ✓ Sub Divisional Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
5. Ex-Executive District Officer, Kohat; Mr. Imitaz ul Haq S/o Ihsan Ullah R/o O.T.S Road, Jungle Khel Kohat.....**Respondents**

Filed to-day

Registrar

30/5/18

APPEAL UNDER SECTION 4 OF THE KHYBER

PAKHTUNKHWA SERVICE TRIBUNAL ACT,

1974 AGAINST THE IMPUGNED ORDER OF

REMOVAL OF APPELLANT VIDE DATED

22.07.2005, WHILE THE DEPARTMENTAL

APPEAL WAS UNANSWERED.

Prayer in Appeal:-

On acceptance of this appeal, the impugned order of removal of the appellant, vide dated 22.07.2005, may kindly be set aside and the appellant may please be re-instated or be considered in service and the respondents may further be directed to grant/given pension with all pensionary benefits to the appellant under the law.

Any the relief, the Honourable Court may deem fit for the safe administration of justice

Respectfully Sheweth:-

1. That the appellant was appointed a C.T, in government girls high school, Shakar Dar, kohat in 23.09.1981.
2. That the appellant has performed his duty as C.T, in Government Girls High School, Shakar dara Kohat, since 23.09.1981 till 15.10.2003.
3. That the appellant was badly sick and in this regard she submitted an application for causal leave, but no order has been passed on the said application.

4. That the appellant submitted several application for medical/causal leave but the respondents have given no response.
5. That the appellant then applied for her pension as she reached sixty years but no response then the appellant filed service appeal, and during the pendency of appeal the respondents submitted the removal order of appellant before the Hon'ble Service Tribunal, so the said service appeal has been dismissed/withdrawn.
6. That the appellant came to know regarding the order of her removal, when the respondents submitted the removal order on 07.02.2018, before the Hon'ble Service Tribunal, then the appellant filed service appeal on 05.03.2018, which is unanswered, hence this service appeal or the following amongst the other grounds:-

G R O U N D S:

- A. That the impugned order of removal of the appellant vide dated 22.07.2005 is against law and justice and is liable to be set aside.

- B. That the impugned order vide dated 22.07.2005, was fabricated and prepared during pendency of service appeal, malafidely, just for concealed their inefficacy and the signature on the order is bogus etc.
- C. That the appellant has never been informed regarding the so called removal order vide dated 22.07.2005 while the appellant submitted an application/ departmental appeal, but at that time the appellant has not been inform, which shows, the malafide on the part of respondents.
- D. That no Show Cause Notice, statements of allegation, charge sheets have been issued to the appellant and no inquiry conducted under the law.
- E. That no show cause notices issued in the newspaper etc.
- F. That even the removal order is not according to law.

- G. That a letter, dated 03.03.2018, was issued from the office of EDO (Female) which shows the malafide of the respondents.
- H. That there is no entry of removal in the service book of the appellant.
- I. That the appellant is legally entitled for her pensionary benefit as she already submitted an application for this regard to the respondents.
- J. That the appellant has performed her duty as C.T since the year 1981 as Shakkar Darra but the appellant was badly sick and in his regard she submitted an application.
- K. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is, therefore most humbly prayed that acceptance of this appeal, the impugned order of removal of the appellant, vide dated 22.07.2005, may kindly be set aside and the appellant may please be re-initiated or be considered in service and the respondents may further be directed to

grant/given pension with all pensionary benefits to
the appellant under the law

Any the relief, the Honourable Court may
deem fit for the safe administration of justice

Muntaz Begum

Appellant

Through

Hassan U.K Afridi
Advocate High Court

Dated 29.05.2018

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2018

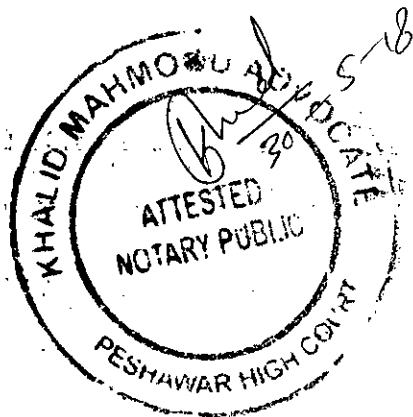
Mumtaz Begum.....**Appellant**

VERSUS

Government of Khyber Pakhtunkhwa
Through Chief Secretary E&SE & others.....**Respondents**

AFFIDAVIT

I, Mumtaz Begum, C.T, Government Girls High School, Shakar Darra, Kohat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Mumtaz Begum

DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2018

Mumtaz Begum.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa
 Through Chief Secretary E&SE & others.....**Respondents**

ADDRESSES OF PARTIES

A P P E L L A N T:

Mumtaz Begum, C.T, Government Girls High School,
 Shakar Darra, Kohat

R E S P O N D E N T S:

1. Government of Khyber Pakhtunkhwa through Chief Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. Director Elementary & Secondary Education, Peshawar
3. District Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
4. Sub Divisional Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
5. Ex-Executive District Officer, Kohat, Mr. Imitaz ul Haq S/o Ihsan Ullah R/o O.T.S Road, Jungle Khel Kohat
 Appellant

Through

Dated 29.05.2018

Hassan U.K Afridi
 Advocate High Court

Name _____ (نام)
 Nationality and Religion _____ (قومیت اور مذہب)
 Residence _____ (مستقل رہائش)
 Father's name and residence _____ (والد کا نام اور پتہ)
 Date of birth by Christian era as nearly as can be ascertained _____ (تاریخ پیدائش مطابق سن عیسوی)
 Exact height by measurement _____ (قد و قامت)
 Personal mark for identification _____ (شمارہ شناخت)

Mumtaz Begum
 Pakistani
 Village: Shakardara Tehsil Distt Kohat.
 Mohammad Jaimil - do -
 21-3-1955 NIC-143-55-046241
 5-"
 "Scars near the chin"

Left hand/right hand thumb and finger-impressions of (Non-jazetted) officer.
 (برقی صورت میں ہاتھ اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھنگیا) Ring Finger (چھنگیا کے ساتھ کی انگلی) Middle Finger (گت ساہ)
 Fore Finger (انگشت شہادت) Thumb (انگوٹھا)

Mumtaz Begum
 Signature of Government servant _____ (سرکاری ملازم کے دستخط)
 Signature and designation of the Head of the Office, or other Attesting Officer _____
 (تصدیق کنندہ افسر کے دستخط اور مہر)

Signature
 Mumtaz Begum
 Capt. F. S. Khan

Shahida Parveen
 Head Mistress
 Govt Girls High School
 Shakardara
 21-9-96

21-9-96

The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.
 (میں دستخطوں کے متوجہات کم از کم ہالچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9-10 میں دستخطوں کے نشانات کیلئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔)

1	2	3	4	5	6	7	8
Name of post درجہ ملازمت	Whether substan- tive or officiating and whether permanent or temporary عارضی مستقل یا قائم مقام	If officiating, state— (i) substantive appointment or (ii) whether ser- vice counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عارضی ہے تو کیا وہ رول کے مطابق پنشن کا مستحق ہے	Pay in substantive post تمنخواہ بطور عارضی ملازمت	Additional pay for officiating زائد تنخواہ نائد تمنخواہ بطور قائم مقام	Other em- oluments falling under the term "pay" سوائے تمنخواہ دیگر الادویس	Date of appoint- ment تاریخ تقریری	Signature Government servant دستخط سرکاری ملازم
G. G. H.S. Thakr offg/Temp			RS. 370	RS. P. P.M.		23-9-81 (FN)	Mumtaz B
Do	Do		386/-			1/12 82	Mumtaz B
G.H.S. Shakerdasa offg/Temp	offg/Temp		386/- P.M.			1/12 (FN)	Mumtaz B
(Revised Entries B.P.S. 9)		B.P.S. 9	3283 B:-	E20-2	1200		
G.H.S. Shakerdasa	offg/Temp		649/-			1/7 83	Mumtaz B
(Agro. Tehsil)	do		649/-			1/11 83 (FN)	Mumtaz B
do	do		678/-			1/12 83	Mumtaz B

107

Signature of Government servant	Date of termination or appointment	Promotion, transfer, dismissal etc.)	The Head of the office of other Attesting Officer	Nature and duration of leave taken	Average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		Signature of the head of the office or other Attesting officer	Merit, or censure, or reward or praised of the Government servant
					Period	Govt. to which debitable		
<p>Signature of Government servant</p> <p>Head Mistress Govt. Girls High School Thall</p>	<p>تاریخ انقطاع ملازمت</p> <p>30/11/82</p>	<p>وجوبت انقطاع ملازمت ترقی و تبادلہ یا برطرفی</p>	<p>دستخط انسر مجاز</p> <p>H. M. G. H. S. THALL</p>	<p>وقت کی نوبت و معاذ</p> <p>Undertaking of office</p>	<p>چار ماہ تک کی رعیت کیسے اوسط تنخواہ کا تعین</p> <p>گورنمنٹ</p>	<p>دستخط انسر مجاز</p>	<p>سزا یا جزا یا فخر یا کارکردگی کا ریکارڈ</p>	
<p>Head Mistress Govt. Girls High School Thall</p>	<p>30/11/82</p>	<p>Transfer to G.H.S. Thall</p>	<p>H. M. G. H. S. THALL</p>	<p>9 h/b given option for the adoption of P.S.S-1963 also h/b under take if any excess over payment made of my pay - 7% also is made from that that should be received from my pay Pension as the Deptt deems necessary</p>	<p>Appointed as JET in Wide D.D.E.(S) Pesh, Dir Peshawar andst no. 1076 82 dated 13-9-1981</p>	<p>Head Mistress Govt. Girls High School Thall</p>	<p>Passed S.S.C. exam in 1972 under Roll No. 19386 from Peshawar Board.</p>	
<p>Head Mistress Govt. Girls High School Thall</p>	<p>10/1/83</p>	<p>Transfer to G.H.S. Thall</p>	<p>H. M. G. H. S. THALL</p>	<p>Shahida Parveen</p>	<p>Passed F.A. exam in 1978 under Roll No. 3406 in Grade (D) from Peshawar Board.</p>	<p>Head Mistress Govt. Girls High School Thall</p>	<p>Passed A.G.T.T.C. course wide GATTTC No. 286-80 dated 23-5-1981</p>	
<p>Head Mistress Govt. Girls High School Thall</p>	<p>30/11/83</p>	<p>Annual Periodical Increment</p>	<p>H. M. G. H. S. THALL</p>	<p>Shahida Parveen</p>	<p>Verified From The Office Record</p>	<p>Head Mistress Govt. Girls High School Thall</p>	<p></p>	

دستخط سرکار
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ملازم

620-29-1200 B.C. No 9

649/... 1.12.83

next increment on 1.12.83

Accountant General

SERVIC
Verified From The Office Record

P. 50

Head Mistress
Govt. Girls High School
Thall

1 Name of post	2 Whether substantive or officiating, and whether permanent or temporary	3 If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pt.) volume II	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "pay"	7 Date of appointment	8 Signature of Government servant	9 Signature of the Officer in Charge of the Office or Attestation of the Officer in Charge of the Office
درجہ ملازمت	غرض مستقل تائم مقام	آرڈر میں ہے تو کی دو بدل کے مطابق پیشن کا مستحق ہے	تتمخواہ بطور غرضی ملازمت	بالہ تمخواہ زائد تتمخواہ بطور تائم مقام	ماسوائے تتمخواہ دیگر الاؤنس	تاریخ تقرری	مستحقہ ملازمتی ملازم	مستحقہ ملازمتی ملازم
20-29-1202 (9) ع.ج.	Post GHS Shaladana (Kohat)	—	707/	—	—	12/34	Muntaz Beg	Muntaz Beg
-do-	-do-	—	736/	99/	—	11/85	Muntaz Beg	Muntaz Beg
-do-	-do-	—	765/	138/	—	12/86	Muntaz Beg	Muntaz Beg
(Provisional Fixation)	—	—	—	—	—	—	—	—
MS(9) No 830-38-1590 T. Mistress GHS Shaladana (Kohat)	—	—	1020/	—	—	17/87 (FI)	Muntaz Beg	Muntaz Beg
—	-do-	—	1055/	—	—	12/8 (FI)	Muntaz Beg	Muntaz Beg

9	10	11	12	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in Station Columns to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc)	Signature of the Head of the office of other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitabale to another Government	Reference to any recorded punishment, or reward or Government sanction
	تاریخ انقطاع ملازمت	وجوبت انقطاع کا وقت ترقی و تبادلہ یا برطرفی	دستخط افسر مجاز	رضت کی نوعیت و معیار	Period عرصہ	Govt. to which debitabale گورنمنٹ کے رقم ادا ہوگی
Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	30/11/85		Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	بیماری کی وجہ سے پندرہ روزوں کا قعین		Sanctioned Medical leave on full pay 2.3-1-1982 to 2.6-1-1982 (4 days) and with Pay 2.7-1-82 to 6-1-82 (11 days) vide D.O. Pesh. no. 2684/A
Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	30/11/86		Shahida Jamun Headmistress Govt. Girls High School, Chakardatta			Sanctioned Medical leave on full pay 2.3-1-1982 to 2.6-1-1982 (4 days) and with Pay 2.7-1-82 to 6-1-82 (11 days) vide D.O. Pesh. no. 2684/A
Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	30/6/87 (AM)	Revision of R.P.S. scales w.e.f. 1.7.87	Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	Services verified from 1/12/82 to 30/11/85 and other leaves		Service Verified E 23.9.2/10.1.83 from Kolt & Other Office Record. Except the period 2.7.1.82 to 6.2.82 P.E./P.Y.
Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	30/11/87 (AM)	Annual Inc.	Shahida Jamun Headmistress Govt. Girls High School, Chakardatta			Appointment against (Apo. Technical) post of Post vice Zulfu B. ce. et. (9) is hereby against the post by Muntaz Jamil D.O. 5/11/87 Pesh. N. dt: 3-11
Shahida Jamun Headmistress Govt. Girls High School, Chakardatta	4/12/87 (AM)	on passing B.A. Exam given 3A 1st class with distinction 7/12/87	Shahida Jamun Headmistress Govt. Girls High School, Chakardatta			Headmistress Govt. Girls High School

leave w.e.f. 13/2/84 to 23/8/84 vide
D.O. (9) dt: 26.4.84 on full
pay. Signature of the
head of the office of other
Attesting officer

11

G. G. H. S. THALLI

Handwritten signature

1	2	3	4	5	6	7	8
Name of post درجہ ملازمت	Whether substantive or officiating and whether permanent or temporary عادی مستقل یا قائم مقام	If officiating, state - (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II اگر عادی ہے تو کیا دوروں کے مطابق پیشن کا مستحق ہے	Pay in substantive post تنخواہ بطور عادی ملازمت (of 2011) pay.	Additional pay for officiating زائد تنخواہ زائد تنخواہ بطور قائم مقام (of 2011) pay.	Other emoluments falling under the term "pay" ماسوا تنخواہ دیگر الاؤنس	Date of appointment تاریخ تقریری	Signature Government servant دستخط سرکاری ملازم
BPS (9) 830-38-1590 CT Post S.H.S. Shakardara (Kohat)	Off/Temp		RS. P. 1172/-	RS. P. 33/-		5.12.87 (F.N)	Junior B
BPS (9) Rs. 830-38-1590 CT Post S.H.S. Shakardara, Off/Temp (Kohat)	Off/Temp		1210/- + 34/-			1-12-88 (F.N)	Junior B
U.S. 970-52-2010 (Revised Entires) w.e.f 1-9-88. Awarded selection							
CT Post S.H.S. Shakardara Off/Temp	Off/Temp		1230/-			1.9.88	Junior B
do. Off/Temp	Off/Temp		1282/- 32/- 1334/-			12/1988	Junior B
do. Off/Temp	Off/Temp		1234/-			12/88	Junior B

Office of the District Officer
N.W.F.P., District
Pay Band in the Band of Scale 1987
of Rs. 830-38-1590
at Rs. 1020/-
with West Bengal Government

Signature: O.S. [Signature]

PROVINCIAL.

DETAILS.

(012) = 172.74 Pay
(012) = 31.16 IPay
(022) = 23.00 RRA
(022) = 1.13 LHR

Total = 233.03

Chalan of Cash paid into the National Bank of Pakistan.

Treasury/Sub-Treasury

State Bank of Pakistan.

Kohat.

CHALAN No. 2574/87

To be filled in by the remitter

To be filled in by the Departmental officer or the Treasury.

By whom tendered	Name or designation and address of the person on whose behalf money is paid.	Full particulars of the remittances and of authority (if any)	Amount	Head of Account	Order to the Bank
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Miss Mumtaz Begum
FA/CT. GMS
Shakardara (KHE)

Refund of 7 days pay we 7/12/86 to 13/12/86 paid under PO No. 188 dt 1/1/87 to Mumtaz Begum

Rs. 233.03 1250/1251 Correct Receipts Received and given to

Signature

Shakardara (Kohat)

As it has been sanctioned now as leave w/o pay vide DS(S) KHE/No. 643-45/A-12 dt: 14/10/87

Signature and full designation of the officer ordering the money to be paid

(a) (in words) Rupees two hundred thirty three and paise 03.

Received 28 100 1987
GOVERNMENT ACCOUNTS
Main Branch

To be used only in the case of remittances to Bank through an officer of the Government.

Received payment

Rs. 233/03

Date

Treasurer

Accountant

Treasury Officer

Manager

Particulars

Amount

Coin

Notes (with details)

Cheques (with details)

Total

Entered in S/P Book at page (7)
28.10.87

13

In case there should be any discrepancy in the entries in the columns of the above form, the Officer in Charge of the Office will be held responsible for the same. The entries in the columns of the above form should be filled up by the Officer in Charge of the Office.

Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8

دستخط افسر مجاز

30/11/88 (A.N.)

31/8/88

12/8/88

30/11/89

30/11/90

Duration of leave taken	is debitable to another Government servant	Govt. to which debitable	Period	Remarks
30/11/88				Services rendered from 1/12/86 to 30/11/88 from the Accep Roll and the records of this office.
31/8/88				Paper presented in 1986 under Roll no. 8073 in II Division securing 2610 marks out of 550. Results declared on 5/12/87 in Arts subjects.
12/8/88				Sanctioned 14 days leave on medical leave vide P.O. No. 1076-77/A-12/M-Begum/OT-II-AE dt 19/11/87.
30/11/89				Sanctioned 7 days medical leave vide P.O. No. 643-45/A-12/M-Begum/OT-II-AE dt 14/4/87.
30/11/90				7 days pay vide 7/12/86 to 13/12/86 drawn under Form 188 dt 1/1/87 has been refunded under Ch. No. 8A/26/4/87. Paid vide P.O. No. 643-45/A-12 dt 14/4/87.

(Handwritten signature)

2781/88

1	2	3	4	5	6	7	8
Name of post درجہ ملازمت	Whether substantive or officiating, and whether permanent or temporary عارضی مستقل قائم مقام	If officiating, state -- (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II ارغوانی کوئٹہ دورول کے مطابق پیشن کا مستحق ہے	Pay in substantive post تنخواہ بطور عارضی ملازمت (01201) Pay	Additional pay for officiating زائد تنخواہ زائد تنخواہ بطور قائم مقام (01205) Incl. 1p	Other emoluments falling under the term "pay" ماسوائے تنخواہ دیگر الاؤٹس	Date of appointment تاریخ تقریری	Signature of Government servant دستخط سرکاری ملازم
PS-12) R. 970-52-2010			RS. P.	RS. P.			
Shakar Lane (Kohat)	Sub/Officiating		1386/-			01/12/90 (F.N)	Muntaz Begum
Shakar Lane (KI)		R. 1355-96-	2795	PS-12	Provision by fixation	1-6-91	Muntaz Begum
			2131/R.M.			1-12-91	Muntaz Begum
2 bonus signaling for promotion scale from Rs. 1000							

115. Shakar Lane (KI)	Sub/Officiating		2275/-			2/12/91	Muntaz Begum
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- 1)
- 2)
- 3)
- 4)

Signature and name of Head of the office or other testing officer in station columns to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal etc.)	12 Signature of the Head of the office or other Attesting Officer	13 LEAVE Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	14 Signature of the head of the office or other Attesting officer	15 Reference to any recorded punishment, or censure, or reward or praised of the Government servant
Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	30/5/91	وجوبت انقطاع ثابت ترقی تبادلہ یا برطرفی	رستخط افسر مجاز	Nature and duration of leave taken رضعت کی نوعیت و معیار	دستخط افسر مجاز	سزا یا جزا یا غیر سزا کارکردگی کا ریکارڈ
Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	30/11/91	Annual Increment	Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	①	Under taking	Service verified w.e.f. 30-11-88 from the Reg. Roll & other record of this office
Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	1/12/91	Per Annuo scales of pay	Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	②	Muntaz Begum Head Mistress S.G.H.S. Shaker Darra (Kohat)	I wish Muntaz Begum C.T. 5545, Shaker Darra (Kohat) A/b give an under take to the effect that if any over payment is made to me as a result of incorrect award of S/P scale and detected later on it will not be paid by recovery from my pay/ pension/gratuity etc. as may be fixed by the Govt. Department.
Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	1/12/89	Drawal-1347/- on the diff of 18 annals + diff annals of S/P grade in 15.11.12	Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	③	Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	AWarded selection grade BPS-1750 Rs. 970-52-240 vide Addl. Director (Schools) for D-E (S) NWFP Research office Enrol. No. 6710-65881A-167/A-List/ET/W-II, dated 19/6/89. w.o/ 1-9-88
Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	1347/ ✓	1347/ ✓	Shahida Parveen Head Mistress S.G.H.S. Shaker Darra (Kohat)	④	Muntaz Begum Head Mistress S.G.H.S. Shaker Darra (Kohat)	OPTION I hereby opt. re-fixation of pay on 1-12-1988 after availing increment on 1-12-88 in the promotion scale.

14

برائے

LEAVE

Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government

بارہ ماہ تک کی رخصت
تینے اوسط تنخواہ کا تعین
Govt. to which debitable
گورنمنٹ سے
رقم ادا ہوگی

Service verified w.e.f. 30-11-88 from the Reg. Roll & other record of this office

I wish Muntaz Begum C.T. 5545, Shaker Darra (Kohat) A/b give an under take to the effect that if any over payment is made to me as a result of incorrect award of S/P scale and detected later on it will not be paid by recovery from my pay/ pension/gratuity etc. as may be fixed by the Govt. Department.

ATTESTED:
Shahida Parveen
Head Mistress
S.G.H.S. Shaker Darra
(Kohat)

AWarded selection grade BPS-1750 Rs. 970-52-240 vide Addl. Director (Schools) for D-E (S) NWFP Research office Enrol. No. 6710-65881A-167/A-List/ET/W-II, dated 19/6/89. w.o/ 1-9-88

OPTION
I hereby opt. re-fixation of pay on 1-12-1988 after availing increment on 1-12-88 in the promotion scale.

ATTESTED:
Shahida Parveen
Head Mistress
S.G.H.S. Shaker Darra
(Kohat)

Signature of the head of the office or other Attesting officer

دستخط
افسر مجاز

Under taking

Muntaz Begum
Head Mistress
S.G.H.S. Shaker Darra
(Kohat)

Shahida Parveen
Head Mistress
S.G.H.S. Shaker Darra
(Kohat)

Muntaz Begum
Head Mistress
S.G.H.S. Shaker Darra
(Kohat)

Shahida Parveen
Head Mistress
S.G.H.S. Shaker Darra
(Kohat)

Reference to any recorded punishment, or censure, or reward or praised of the Government servant

سزا یا جزا یا غیر سزا
کارکردگی کا ریکارڈ

Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت	عارضی مستقل یا قائم مقام	اگر عارضی ہے تو یہ دو رول کے مطابق پیش کش کا مستحق ہے	تنخواہ و بطور عارضی ملازمت	زائد تنخواہ زائد بطور قائم مقام	ماسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	تقرری ملازم
<p>Pay fixed on account of award of BPS-15</p> <p>Rs. P. 131-3585</p>							
T. R. H. S. Rakardara	off temp		Rs. 2144/- Pm	✓		1.6.91	Munstaq
do	do		Rs. 2275/- Pm	✓		1.12.91	Munstaq
do	do		Rs. 2406/- Pm	✓		1.12.92	Munstaq
do	do		Rs. 2537/- Pm	✓		12/72	Munstaq
<p>Office of the Accountant General N. W. F. P. Peshawar</p> <p>Pay fixed in the revised Pay Scale 1989 of Rs. 1355-96-2595 with next increment on 1-12-1991</p>							
<p>Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991</p>							
<p>Office of the Accountant General N. W. F. P. Peshawar</p> <p>Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991</p>							
<p>Office of the Accountant General N. W. F. P. Peshawar</p> <p>Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991</p>							

Pay fixed on account of award of BPS-15

Rs. P. 131-3585

Office of the Accountant General N. W. F. P. Peshawar

Pay fixed in the revised Pay Scale 1989 of Rs. 1355-96-2595 with next increment on 1-12-1991

Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991

Office of the Accountant General N. W. F. P. Peshawar

Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991

Office of the Accountant General N. W. F. P. Peshawar

Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991

Office of the Accountant General N. W. F. P. Peshawar

Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991

Office of the Accountant General N. W. F. P. Peshawar

Pay fixed in the revised Pay Scale 1989 of Rs. 1622-136-3585 with next increment on 1-12-1991

Office of the Accountant General N. W. F. P. Peshawar

PAY FIXATION PROFORMA UNDER REVISED PAY SCALE RULES 1991.

15

1. Name and Designation.	_____
2. Existing Pay Scale.	Rs. 1165-21-2585
3. Modified Pay Scale.	Rs. 1165-21-2585 - BPS-15
4. Revised Pay Scale.	Rs. 1355-96-2795 BPS-15
5. Pay on 31-5-1991.	Rs. 2267/-
6. Pay Fixation made under Formula "A"	Rs. 1445/-
7. Pay fixed in the modified Pay Scale.	Rs. 1445/-
8. No of Stages arrived at in the M.P.S.	63
9. Pay fixed in BPS as on 1-6-91 on basis of corresponding stages in that scale.	2013/-
<u>FORMULA "B"</u>	
1. Basic Pay on 31-5-91.	Rs. 1385/-
2. Index Pay	Rs. 39/-
3. 5% Adhoc Increases 200	Rs. 69.00
4. 10% Adhoc Increases.	Rs. 139.00
5. Dearness Increase 200.	Rs. 200.00
6. Total	Rs. 1833.00
7. Increases of Rs.100/-	Rs. 100.00
8. TOTAL:-	Rs. 1933.00
9. Pay fixed in BPS No. on 1-6-91.	BPS-15 - 2147/-
10. Pay admissible on 1-6-91.	Rs. 2147.00
11. Advance Increments allowed in Higher Qualification if any).	Nil
12. Date of Next Increment.	1.12.1991.

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BPS-15 - Being assessed of 5/80 ad.

Office of the Accountant General
U.K. KHATTAK
N.W.F.P. Pakistan

Shahida Zameen
SIC (DRAGICAL) DISBURSING
OFFICER IN CHARGE

Pay fixed in the revised Pay Scale 1991
1. Rs. 1355-96-2795
2. Rs. 2227.2 P.M.V.E.F.1-01991
with next increment on 1-12-1991

Accounts Officer
Pay Fixation Party
N.W.F.P. Pakistan

Handwritten initials/signature

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc)	Signature of the Head of the office of other Attesting Officer	LEAVE		Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure or reward or praised of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت یا برطرفی	دستخط افسر مجاز	رضت کی نوعیت و معیار	Period عرصہ	دستخط افسر مجاز	سزا یا اجزا یا فوجیہ کارکردگی کا ریکارڈ
					Govt. to which debitable		
Shahida Parveen Head Mistress G.G.H.S. Shaker Darr	30/11/91	Annual Increment	Shahida Parveen		Govt. to which debitable	(7)	Service verified w.e.f 1-12-88 to 30-11-89 from the Agg. Roll & other record of this school.
Shahida Parveen Head Mistress G.G.H.S. Shaker Darr	30/11/92	Annual Increment	Shahida Parveen		Govt. to which debitable	(8)	Medical leave sanctioned w.e.f 21-10-89 to 23-11-89 (34 days) on full pay and for 24-11-89 one day without pay on the strength of Medical certificate vide Director of Education (S) Kohat Division, Kohat office Encl. No. 2896-98/PF/II-Ad. Dated 10/1/1990.
Shahida Parveen Head Mistress G.G.H.S. Shaker Darr	30/11/93	Annual Increment	Shahida Parveen		Govt. to which debitable	(9)	Service verified w.e.f 1-12-89 to 30-11-90 from the Agg. Roll & other record of this school.
Shahida Parveen Head Mistress G.G.H.S. Shaker Darr	30/11/94	Annual Increment	Shahida Parveen		Govt. to which debitable	(10)	Service verified w.e.f 1-12-90 to 30-11-91 from the Agg. Roll & other record of this school.

[Handwritten signature]

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3.20 of C.S.R. (Pb.) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت	عارضی مستقل	الر عارضی توفیق وہ رول کے مطابق پیشن کا مستحق ہے	تنخواہ بطور عارضی ملازمت	زائد تنخواہ بطور تائم مقام	ماسوائے تنخواہ دیگر الادرس	تاریخ تقرری	مختصہ سرکاری ملازم
Revised Entries are as under			RS. P.	RS. P.		1-6-94	
C.T. - G.G.H.S. Kardalvi	Temp/ موقت			3429/- P.M.		1-6-94	Munir Begum
do	do			3606/- P.M.		1-6-94	Munir Begum
do	do			3783/- P.M.		1-6-95	Munir Begum
do	do			3960/- P.M.		1-6-96	Munir Begum
do	do			4137/- P.M.		1-6-97	Munir Begum
do	do			4137/- P.M.		1-6-98	leave with out pay
do	do			4314/- P.M.		1-6-99	Munir Begum
do	do			4491/- P.M.		1-6-2000	Munir Begum
Revised Entry used			-12-2001			BAS-15	
G.G.H. Shikandi	do			6200/- P.M.		1-6-2001	Munir Begum
				6465/- P.M.			

OPTION

[Signature] (17)

I, Miss Mumtaz Begum C.T of GGHS Shakardara (Kohat) hereby opt for re-fixation of my pay w.e.f. 2.12.91 in pre-promotion scale from BPS-12 to BPS-15 (Rs. 1620-131-3535 BPS+15).

Mumtaz Begum
(MUMTAZ BEGUM C.T)

Attested

Shahida Parveen
Head Mistress
Govt. Girls High School
Shakardara Kohat

[Signature]

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18

9	10	11	12	13 LEAVE		14	15
Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc.)	Signature of the Head of the office of other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned days) to which leave salary is debitable to another Government	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure or reward or praised of the Government servant
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجبات انقطاع ملازمت یا برطرفی	دستخط افسر مجاز	وقت کی نوعیت و مدت	جائزہ ماہ تک کی رخصت کے لیے اوسط مستحق اہل کا تعین Govt. to which debitale گورنمنٹ سے رقم ادا ہوگی	دستخط افسر مجاز	سزا یا جزا یا غیر سزا کارکردگی کا ریکارڈ
Shahida Parveen Head Mistress Govt. Girls High School Shahardara (Kohat)	31/9/95	Reversion BPS: 30/95	Shahida Parveen Head Mistress Govt. Girls High School Shahardara (Kohat)	وقت کی نوعیت و مدت		Medical leave 5 months effect from 1/12/92 to 7-12-92 (70 days) and from 15-12-92 to 19-12-92 (5 days) full pay in whole of Dec. K.D.H. - End of work for A-12/12/92 Dated 25-2-93	
Bibi Fatima Head Mistress Govt. Girls High School Shahardara (Kohat)	30/11/95	Annual leave	Bibi Fatima Head Mistress Govt. Girls High School Shahardara (Kohat)	وقت کی نوعیت و مدت		Shahida Parveen Head Mistress Govt. Girls High School Shahardara (Kohat)	Under the leave rules 1972 the leave sanctioned under DFCWS by Head Office Kohat No 7286-88/P/132
Bibi Fatima Head Mistress Govt. Girls High School Shahardara (Kohat)	30/11/98	No leave	Bibi Fatima Head Mistress Govt. Girls High School Shahardara (Kohat)	وقت کی نوعیت و مدت		Earned leave 24 1/2 days on full pay 33 1/2 days	Medical leave 5 months effect from 21/5/97 to 21/5/98 (10 months) in whole of Dec. K.D.H. - End of work for A-12/12/92 Dated 25-2-93
Shahida Parveen Head Mistress Govt. Girls High School Shahardara (Kohat)	30/11/99	No leave	Shahida Parveen Head Mistress Govt. Girls High School Shahardara (Kohat)	وقت کی نوعیت و مدت		Shahida Parveen Head Mistress Govt. Girls High School Shahardara (Kohat)	Passed B-Ed. F. from Kohat University in 1992 Sum 1992 175 Marks Divisional Result 15-4-93

Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 5.20 of C.S.R. (Pb) volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
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CT BPS-15
GGHS
SHAKARABAD

عارضی مستقل
یا
قائم مقام

آر اے عارضی بہ توکیہ
وہ رول کے مطابق
پیشن کا مستحق ہے

RS. P.

RS. P.

6730/- Pm

6995

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1
2002

دستخط سرکاری
ملازم

Due to leave with
increments for
are not
allowed

Pay Band 2190-177-4845
of Rs. 3429
15-11-2001
E. M. P. 1000

Pay Band 3285-265-11235
of Rs. 6730
15-11-2001

9	10	11	12	17	13	14	15
Signature and designation of the Head of the office or other Attesting Officer in columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the Head of the office or other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government چار ماہ تک کی رخصت لینے اور وسط تمخواہ کا تعین Govt. to which debitible گورنمنٹ سے رقم ادا ہوگی	Signature of the head of the office or other Attesting officer	Reference to any recorded punishment, or censure, or reward or praised of the Government servant سزا یا جہز یا غیر متعلقہ کارکردگی کا ریکارڈ
دستخط افسر نجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی یا تبادلہ یا برطرفی	دستخط افسر نجاز	رخصت کی نوعیت و معیار	<div data-bbox="957 637 1516 1146"> <p>12 1-12-93 to 30-11-94 with full pay and allowances w.e.f.</p> <p>Bibi Fatima Head Mistress Govt. Girls High School Mudkur (Distt)</p> <p>12 1-94 30-95</p> <p>Bibi Fatima Head Mistress Govt. Girls High School Mudkur (Distt)</p> <p>Mahmood Khan w.e.f.</p> </div>	دستخط افسر نجاز	
					<div data-bbox="957 1146 1516 1656"> <p>Perimalal June Sanku w.e.f. 1-10-94 to 17-11-94 (15 days) with full pay & 18-11-94 to 23-11-94 (6 days) with full pay & 24-11-94 to 1-1-95 (30 days), with full pay on the straight of M. C. rule D.O. (S) U.D. & NO 2835-37/P.F. dt 11-15-3-95</p> </div>		

1913

21

چھٹی LEAVE

Signature and designation of the Head of the office or other Attesting Officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer dismissal etc.)	Signature of the Head of the office of other Attesting Officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of head of the office or other Attesting officer, to which leave salary is debitable to any Government, or
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ثابت ترقی، تبادلہ یا برطرفی	دستخط افسر مجاز	رضیت کی نوعیت و معیار	Period عرصہ	Govt. to which debitable گورنمنٹ سے رقم ادا ہوگی
						<p>1-12-95 to 30-11-96</p> <p>Verified from The Office Record</p> <p><i>[Signature]</i></p> <p>15</p> <p>1-12-96 to 30-11-97</p> <p><i>[Signature]</i></p> <p>15</p> <p>Govt. Girls High School Shikardara (Kohat)</p> <p>1-12-97 to 30-11-98</p> <p><i>[Signature]</i></p> <p>16</p> <p>Govt. Girls High School Shikardara Kohat</p> <p>1-12-98 to 30-11-99</p> <p><i>[Signature]</i></p> <p>HEAD MISTRESS DPO Govt. Girls High School Shikardara Kohat</p>

[Handwritten signature]

22

OFFICE OF THE DISTRICT ~~EDUCATION~~ EDUCATION OFFICER (FEMALE) SECONDARY KOHAT

SANCTION OF LEAVE

Under the provision of Govt: of NWFP revised leave rules: 1981, sanction is hereby accorded to the grant of Extra Ordinary Leave in respect of Mst: Mumtaz Begum, C.T, Govt:Girls High School Shakardara Kohat w.e.f 01.9.2000 to 31.8.2001 (365 days) without pay.

NOTE:-

Necessary entry to this effect should be made in her service book accordingly.

M. Khadeeja Parveen
(MRS. KHADEEJA PARVEEN)
DISTRICT EDUCATION OFFICER
(FEMALE) SECONDARY KOHAT.

Endst:No. 267-8 /Leave case /C.T Vol: Dated 20/6 /2001

Copy to the :-

1. District Accounts officer Kohat.
2. Headmistresses Govt:Girls High School Shakardara Kohat with reference to her memo: No. 725 dated 25.5.2001.
3. Teacher concerned.

M. Khadeeja Parveen
District Education Officer,
(Female) Secondary Kohat.

M. Khadeeja Parveen
[Signature]

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مجاز

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9 Signature and designation of the Head of the office or other Attesting officer in Station columns to 8 دستخط اور مقام	10 Date of termination or appointment تاریخ انقضاء ملازمت	11 Reason of termination (such as promotion, transfer, dismissal etc.) وجوہات انتقال، منتقلی، استعفاء یا برطرفی	12 Signature of the Head of the office or other Attesting Officer دستخط افسر مقام	13 LEAVE طرحی		14 Signature of the head of the office or other Attesting officer دستخط افسر مقام	Refer to any recorded punishment, or censure, or reward or praised of the Government servant سزا یا جزا یا غیرت یا کارکردگی کا ریکارڈ	
				Nature and duration of leave taken رضعت کی نوعیت و معیار	Allocation of periods of leave on average pay upto four months (or earned leave not exceeding 120 days) to which leave salary is debit to another Government چار ماہ تک کی رضعت کے لیے اوسط دستخطی اجراء کا تقسیم Period Govt. to which debitible عرصہ گورنمنٹ میں رقم ادا ہوگی			
						Medical		
<p>Drawn Rs 6675/55 on a/c of 4/5 w.r. 26/5/97 to 04/7/97 (60 days) ex 4137/para.</p> <p>Drawn Rs 530/- w.r. 12/12/97 to 21/6/98</p> <p>Resumed her duty on 4/2/2002 (FN) vide this office order no 891/F-18 dt. 4-2-2002.</p>						<p>Sanctioned / Earned leave under D.O.C.F) Sd/- dt. 18/7/97 / Monthly Government Leave 21-2-98 to 21-6-98 Earned leave.</p> <p>1) 1-1-98 to 5-1-98 (5 days) on full pay</p> <p>2) 12-6-98 to 31-5-98 (146 days) on full pay <u>Medical leave</u></p> <p>3) 26-5-97 to 4-7-97 (40 days) on full pay</p> <p>4) 15-7-97 to 27-7-97 (123 days) on full pay</p> <p>5) 25-8-98 to 27-8-98 (03 days) on full pay</p> <p>6) 28-8-98 to 01-12-98 (96 days) on full pay</p> <p>7) 2-9-99 to 07-9-99 (06 days) on full pay</p> <p>8) 8-9-99 to 31-12-99 (115 days) on full pay</p> <p>9) <u>Maternity leave</u></p> <p>1) 02-12-98 to 01-3-99 (97 days) on full pay before confinement & after confinement</p>		
						<p>Head Mistress HEAD MISTRESS Govt. Girls High School Shakardara, Kohat</p> <p>4/2/2002</p>		
						<p>Sanctioned Extra ordinary leave w.r. 01-9-2000 to 31-8-2001 365 days with out pay vide D.O.C.F) Sd/- dt. 25-1-2000 Endst No: 2607-2/1000</p> <p>Sanctioned Medical leave w.r. 01-2-2000 to 28-5-2000 (116) days with out pay vide D.O.C.F) Sd/- dt. 25-1-2000 Endst No: 8970 dated 25-1-2000</p>		
						<p>Head Mistress HEAD MISTRESS Govt. Girls High School Shakardara, Kohat</p>		

Muhammad Begum

تعمیراتی کاموں کے لیے

مستحقانہ رقمیں کیلئے درخواستیں
کے تحت پیش کی گئی ہیں۔

① DT Edu
② DT Edu
③ Setting Edu
k pik
k pik

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مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

21/11/1955
مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

2014
2003
15/10/2014
مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

مستحقانہ رقمیں کیلئے
درخواستیں پیش کی گئی ہیں۔

28

26

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR



Service Appeal No. 666 /2017

Khyber Pakhtunkhwa Service Tribunal

Diary No. 652

Dated 12-6-2017

Mumtaz Begum, C.T, Government Girls High School, Shakar Darra, Kohat.....**Appellant**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. Director Elementary & Secondary Education, Peshawar
3. District Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
4. Sub Divisional Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
.....**Respondents**

Filed to-day

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE DENIAL OF RESPONDENTS TO GRANT PENSIONARY BENEFIT TO THE APPELLANT UNDER THE LAW /RULES

[Signature]
Registrar
12/6/17

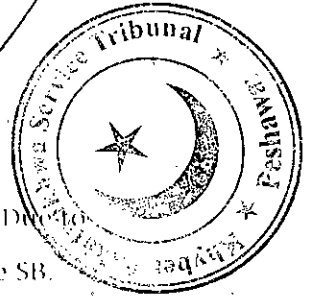
Re-submitted to -d...
and filed.

[Signature]
Registrar
19/6/17

ATTESTED

[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

29



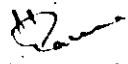
22/8/2017

No one is present on behalf of the appellant. Due to strike of the bar case adjourned to 12/9/2017 before SB.


(GUL ZEB KHAN)
MEMBER

12.09.2017

None present on behalf of the appellant. Mr. Kabirullah Khattak, Assistant AG for the respondents present. Notice be issued to appellant and his counsel for attendance for 04.10.2017 before S.B.


(Muhammad Farid Mughal)
Member

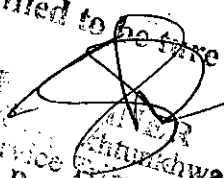
04.10.2017


Counsel for the appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for preliminary hearing on 30.10.2017 before S.B.


(Muhammad Amin Khan Kundi)
Member

30.10.2017

Counsel for the appellant and Mr. Ziaullah, DDA for respondents present. Learned Counsel for the appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 29.11.2017 before S.B.

Certified to be true copy

Khyber Pakhtunkhwa
Service Tribunal,
Peshawar


Ahmad Hassan
(Member)


31.07.2017

28

Counsel for the appellant present. He submitted his arguments that the appellant had filed an application for leave for the first time from 15.3.2003 till 31st May, 2014 (the nature of leave applied for is not known). That no order on her leave application was ever passed nor she was terminated from service and that the appellant could not continue with her service due to being mentally deranged on certain occasions. That now she has attained the age of superannuation and is entitled for pensionary benefits. This Tribunal put a query to the learned counsel for the appellant that how the present appeal could be filed when the appellant is not mentally fit? The learned counsel for the appellant replied that her insanity is intermittent. The second question put to the learned counsel for the appellant that how she could claim pension when she had not served after 15.10.2003, and no order of her retirement on any of the grounds i.e. retiring age or invalidation etc. has ever been made. And at present she is claiming her pension on the basis of superannuation but her superannuation matured on 31.3.2015 and she filed the appeal before the department on 27.2.2017. Before proceedings any further this Tribunal deems it appropriate to issue pre-admission notice to the respondents for 22.08.2017 before S.B.


Chairman

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Form- A

FORM OF ORDER SHEET


Court of _____

Case No. 666/2017

Date of order proceedings
2
19/06/2017

Order or other proceedings with signature of judge or Magistrate
3

The appeal of Mst. Mumtaz Begum resubmitted today by Mr. Hassan U.K. Afridi Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.


REGISTRAR 19/6/17

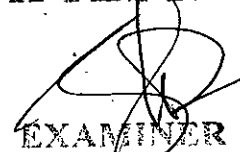
30/6/17

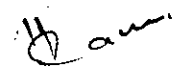
This case is entrusted to S. Bench for preliminary hearing to be put up there on 17/7/17.



CHAIRMAN

Junior to counsel for the appellant present. Junior to counsel for the appellant seeks adjournment on the ground of senior counsel is not available out of station. Adjourned. To come up for preliminary hearing on 31.07.2017 before S.B.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar


(Muhammad Hamid Mughal)
Member

Date of Presentation of Application	_____
Number of Pages	<u>1600</u>
Copying Fee	<u>10</u>
Urgent	_____
Total	<u>10</u>
Name of Applicant	
Date of Completion of Work	<u>13-11-17</u>
Date of Delivery of Copy	<u>13-11-17</u>

NOTIFICATION

1. WHEREAS, Mst: Muntaz Begum CT GCHS Shakar Dara Kohat was ~~xxxxxx~~ proceeded against under the NWFP Removal from service (special power) ordinance 2000 on account of willfull and unauthorised absence w.e.f. 1.10.2004.
2. AND WHEREAS, The Head Mistress GCHS Shakar Dara Kohat has sent absent notice in respect of Muntaz Begum CT GCHS Shakar Dara Kohat vide letter NO 544 dated 28.6.2005.
3. AND WHEREAS, The accused teacher was served absent letter NO 516 dated 29.6.2005.
4. AND WHEREAS, The Competent authority Executive Distt: Edu: officer (Schools & Lit:) Kohat has already published absent notice against the said teacher in the Daily News Paper dt: 27.3.2002, but until now, the said CT Teacher shirking her paramount responsibilities with one pretext or other and did not performed duty satisfactorily just join duty for one day to realize the Deptt: her existence which cannot absolve and suffice to satisfy the rule.
5. AND WHEREAS, The competent authority Executive Distt: Edu: officer (Schools and Litney) Kohat after having considered the above evidence on record, her response to the absence notice is of view that the charges leveled against accused official have been proved.
6. Now THEREFORE, In exercise of power conferred under the NWFP Removal from service (Special Powers) ordinance pleased to imposed Major penalty of removal from service" Mst: Muntaz Begum CT GCHS Shakar Dara Kohat from the date of her willfull and Unauthorised absence from duty w.e.f. 1.10.2004. The Intervening period of absence w.e.f. 1.10.2004 till the issuance of Removal Notification shall be treated as unauthorised absence from duty without pay.

EXECUTIVE DISTRICT OFFICER?
(SCH OLS & LIT) KAHAT

Order No. 611-15/1

Date 22/7/2005

Copy of the above is forwarded to:-

1. Distt: Accounts officer Kohat.
2. Headmistress GCHS Shakar Dara Kohat.
3. Mst: Muntaz Begum CT GCHS Shakar Darrs Kohat.
4. PA to EDO (S&L) Kohat.
5. Distt: officer (S & L) Kohat.

[Signature]
District Officer,
(S&L) Kohat.

[Signature]

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY KOHAT
APPOINTMENT OF C.T (FEMALE)

30

Consequent upon the approval of the District Selection Committee Kohat for the appointment of the following C.T (Female) candidates are hereby appointed on (Batch wise merit) in BPS-09 Rs.(3185-190-8885) on regular basis against the vacant post at the school noted against the vacant post each in the interest of public service with effect from the date of taking over charge.

S. #	Roll No	B/W Position	Name of Candidate/F. Name	Address	School where posted	Remarks
01	93	30.11.99	Shamim Akhter D/O Nazar Gul	S/Dara Kohat	GGHSS S/Dara	Vice Muntaz Begum Absent from duty since long her lien is kept in GGNIS Rehman Abad

TERMS AND CONDITIONS

1. They will be governed by such Rules & the Government may issue regulations as from time to time.
2. Their services will be terminated by any time in case their performance is found unsatisfactory/found and error/fraud they will be proceeded against under the removal from service Special power Ordinance 2000 & E&D rules 1973.
3. They are required to produce Health & Age certificate from Medical authority concerned before taking over charge.
4. They will produce Bank receipt for the verification fee deposited in connection of their Certificate/Degree etc before handing and taking over charge to this office. In case their documents proved fake their appointment will be considered as cancelled without any right or privilege.
5. The concerned DDOs will not draw their pay till the process of verification of their documents is completed.
6. No TA/DA etc is allowed.
7. They will not be handed over charge if they are under 18 years and above 30 years of Age.
8. Their services will be considered as regular without pension and gratuity in terms of Section 19 of NWFP Civil Servant act 1973 as amended by the NWFP Civil Servant amendment Act 2005.
9. They will contribute CP fund @ the Government will make 10% at the minimum of pay 10% contribution.

(MOHAMMAD KHAN)
 EXECUTIVE DISTRICT OFFICER
 SCHOOLS AND LITERACY KOHAT

Encl: No. 26-92/CT:(F) Dated Kohat the 03 / 03 /2008.

Copy of the above is forwarded for information to the:-

10. PS to Secretary to Government Schools and Literacy Deptt: Peshawar.
11. PA to Director Schools and Literacy NWFP Peshawar.
12. PA to District Nazim, Kohat.
13. PA to District Co-Ordination Officer Kohat.
14. DAO Kohat with the request that the bills of the above named candidate may not be honored till this office completes the verification process duly authenticated.
15. Principals/Headmistress concerned.
16. Candidate concerned.

DISTRICT OFFICER (FEMALE)
 SCHOOLS AND LITERACY KOHAT

[Handwritten signature]

محضور جناب ڈائریکٹر ایجوکیشن پشاور

عنوان: محکمانہ اپیل

درخواست دہندہ ممتاز بیگم برخلاف حکم برخاست لیٹر 15-6111-2005 نمبر مورخہ: 22-07-2005

- جناب عالی:- یہ کہ اپیل کنندہ کی تقرری مورخہ: 23-09-81 کو کثیث CT پیپر GGHS مل ضلع کوہاٹ میں ہوئی۔
- (۲) سالہ نے 15-03-2003 تک بدستور اپنی فرائض سرانجام دیتی رہی۔ بعد ازاں سالہ بیمار پڑھ گئیں اس کے بعد سالہ بدستور محکمہ ایجوکیشن DEO کوہاٹ زنانہ کے ساتھ بذریعہ درخواست رابطہ میں رہتی رہی۔
- (۳) اسکے بعد سالہ کی عمر 60 سال کو پہنچی تو DEO (FM) کو پٹیشن کی درخواست دی تو اس متعلق کوئی جواب نہ دیا گیا۔
- (۴) اس کے بعد سالہ نے مورخہ 9-06-2017 کو سروس ٹریبونل پشاور میں اپیل برائے پٹیشن دائر کی۔
- (۵) اس دوران محکمہ ایجوکیشن ضلع کوہاٹ نے اپیل کنندہ کا ٹرینیشن آڈر 22-07-2005 کا مورخہ 07-02-2018 کو سروس ٹریبونل پشاور میں پیش کیا گیا۔ یہ کہ اپیل کنندہ 07-02-2018 کو اپنی ٹرینیشن کا علم ہوا تو اس نے اپیل بالا دائر کیا۔
- (۷) یہ کہ آڈر ٹرینیشن مورخہ 22-07-2005 بدینتی پر مبنی ہے۔ کیونکہ جب اپیل کنندہ نے مورخہ 27-02-2017 کو جو محکمانہ اپیل کی تھی برائے پٹیشن ادا ہوئی تو محکمہ نے اس درخواست پر کوئی جواب نہیں دیا تھا۔ اور جب محکمانہ اپیل دائر کی گئی تو اپیل کنندہ برخاست ملازمت کا آڈر 22-07-2005 کو ظاہر کیا گیا۔ جب کہ یہ آڈر دوران سروس اپیل ہی تیار کیا گیا ہے۔
- (۸) یہ کہ اپیل کنندہ کو کوئی شوکار وغیرہ نہیں دیا گیا اور نہ اس بابت کوئی اٹکوائی ہوئی ہے اور نہ اطلاع آگاہی کی گئی ہے۔
- (۹) یہ کہ اپیل کنندہ کی سروس بک میں کسی قسم کے ٹرینیشن آڈر کا ذکر موجود نہیں ہے۔
- (۱۰) سابقہ خط کتابت سے واضح ہو رہا ہے کہ سالہ کا حکمانہ ٹرینیشن آڈر نہیں ہوا بلکہ موجودہ سروس ٹریبونل میں پیش کردہ آڈر نمبر 15-6111-2005 کی کاپی سے واضح ہے کہ یہ جعلی ہے۔ اور بعد میں بدینتی کا مظاہرہ کرتے ہوئے محض سالہ کو نقصان پہنچانے کی خاطر خادنا کام کوشش کی گئی ہے۔ استدعا کی جاتی ہے کہ سالہ کی درخواست پر ہمدردانہ غور فرما کر سالہ کی خلاف آڈر نمبر 15-6111-2005 منسوخ کیا جائے۔ سالہ کو پٹیشن کا حق دار قرار دیا جائے۔ اور منصفانہ تحقیق بابت برخاست درخواست لیٹر نمبر 15-6111-2005 مورخہ 22-07-2005 کی جائے۔ تاکہ سالہ کی حق رسی ہو سکے۔

سالہ ممتاز بیگم موبائل 03359618484

مورخہ 05-03-2018

کاپی برائے:-

(۱) سیکرٹری ایجوکیشن سیکنڈری ایلیمنٹری پشاور

(۲) ڈائریکٹر ایجوکیشن سیکنڈری ایلیمنٹری پشاور

(۳) DEO زنانہ کوہاٹ

(۴) DC کوہاٹ



LEOPARDS COURIER SERVICE (PVT.) LTD. **CASH** 504162287 P-Z
 G.S.T. NO.: 12-00-9808-001-91

From:	To:	SERVICE	CHARGES
	DEHAT	Pieces	
	OH	Weight	
From:	To:	Price Inclusive of G.S.T.	
	OH	SIG.	
CASH	100	NO DECLARED VALUE	DATE 5/3 TIME

"Leopards" Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed to All the Conditions Printed on Reverse
 سہاگلڈن / غلوڈ / اپھوٹ / ایس / برٹیزو ٹریک / زوارت اور جیٹا شپ
 "لیپزڈ کوریر" قبول میں کرنا اگر آپ نے غلطیاں کرتے ہوئے ای کی ہے "لیپزڈ کوریر"
 حوالے کی وائی ہائیڈ کی گئی ہے "لیپزڈ کوریر" کی کوئی دوسری روک نہ ہوگی

LEOPARDS COURIER SERVICE (PVT.) LTD. **CASH** 504162288 P-Z
 G.S.T. NO.: 12-00-9808-001-91

From:	To:	SERVICE	CHARGES
	DEHAT	Pieces	
	OH	Weight	
From:	To:	Price Inclusive of G.S.T.	
	OH	SIG.	
CASH	100	NO DECLARED VALUE	DATE 5/3 TIME

"Leopards" Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed to All the Conditions Printed on Reverse
 سہاگلڈن / غلوڈ / اپھوٹ / ایس / برٹیزو ٹریک / زوارت اور جیٹا شپ
 "لیپزڈ کوریر" قبول میں کرنا اگر آپ نے غلطیاں کرتے ہوئے ای کی ہے "لیپزڈ کوریر"
 حوالے کی وائی ہائیڈ کی گئی ہے "لیپزڈ کوریر" کی کوئی دوسری روک نہ ہوگی

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LEOPARDS COURIER SERVICE (PVT.) LTD. **CASH** 504162289 P-Z
 G.S.T. NO.: 12-00-9808-001-91

From:	To:	SERVICE	CHARGES
	Director KPR Education	Pieces	
	OH	Weight	
From:	To:	Price Inclusive of G.S.T.	
	OH	SIG.	
CASH	150	NO DECLARED VALUE	DATE 5/3 TIME

"Leopards" Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed to All the Conditions Printed on Reverse
 سہاگلڈن / غلوڈ / اپھوٹ / ایس / برٹیزو ٹریک / زوارت اور جیٹا شپ
 "لیپزڈ کوریر" قبول میں کرنا اگر آپ نے غلطیاں کرتے ہوئے ای کی ہے "لیپزڈ کوریر"
 حوالے کی وائی ہائیڈ کی گئی ہے "لیپزڈ کوریر" کی کوئی دوسری روک نہ ہوگی

LEOPARDS COURIER SERVICE (PVT.) LTD. **CASH** 504162290 P-Z
 G.S.T. NO.: 12-00-9808-001-91

From:	To:	SERVICE	CHARGES
	Secretary Education	Pieces	
	OH	Weight	
From:	To:	Price Inclusive of G.S.T.	
	OH	SIG.	
CASH	150	NO DECLARED VALUE	DATE 5/3 TIME

"Leopards" Accepted Above Mentioned Items on Shipper's Risk & Shipper Agreed to All the Conditions Printed on Reverse
 سہاگلڈن / غلوڈ / اپھوٹ / ایس / برٹیزو ٹریک / زوارت اور جیٹا شپ
 "لیپزڈ کوریر" قبول میں کرنا اگر آپ نے غلطیاں کرتے ہوئے ای کی ہے "لیپزڈ کوریر"
 حوالے کی وائی ہائیڈ کی گئی ہے "لیپزڈ کوریر" کی کوئی دوسری روک نہ ہوگی

OUT DOOR PATIENT TICKET

Health Department

33

District _____

Sent To: _____

Facility Name _____

Name 26/6 Age: _____ Sex: Male

Father's/Husband's Name _____

Date 17/11/2007

Yearly OPD No. 3247 Monthly OPD No. _____

Provisional Diagnosis: Lumbago

Date

Clinical Findings / Investigations / Treatment / Referred

Handwritten notes:
Date
MRT
Lumbago
Spinal
Div. of Health Services
Kohat

Signature / C/O

Signature

No.

Rs. 2/-

OUT-PATIENTS DEPARTMENT.

NAME *Mantoz Begum*

YEARLY NO. *39657*

DATE *1/12/03*

DISEASE

scatica

FACE VALUE RUPEES

28

38

*by
1/12*

Abra - 1/12/03

Neurotrauma

T.B. Distalgie

1/12/03

T.B. Subject 2

1/12/03

1/12/03

1/12/03

[Signature]

NAME ... Muly. Begun
NEARLY NO. ... 386.53 (32)
DATE ... 15/10/03
DISEASE

FACE VALUE RUI

32
Mucoculitis BPP 1387/31

35

Ms. Mucoculitis -

Ms. Mucoculitis -
- over 3/1

Ad visit two weeks
10.2.1 - 15/10/03 on ward.

10.2.1
- em

(Back ache
Lim bigo)

Alford
R

Pressure on the

Munday Begun

4/14/22
16.12.2023

(24)

Buckeye

36

By muscog. 10m sh

2/15
1/25 - Fielder Flute
10.11

1/28 - rounded
10.11

6m

Ad. nest 7m days
10.2.1. 16/12/23

Handwritten signature or initials

37

[Handwritten signature]

26

(A.T.M. 80)

(See para. 252, Audit Manual)

Office of the.....
Year of Account..... 96-97

Name of Subscriber: Munir Begu

Account No. W/Edce/KT/2406/20

Opening Balance	Deposits during the year	Particulars of missing credits of previous years adjusted during the year		Interest for the year		Withdrawals during the year	Balance (1)+(2)+(4)+(6)+(7)	Months of the current year for which credits have not been included in column (2)
		Months and year	Amount adjusted	Rate	Amount			
1	2	3	4	5	6	7	8	9
Rs.	Rs.		Rs.		Rs.	Rs.	Rs.	
40259	3420	—			9175	—	52859	

Signature
Designation
Dated

upt 6/97
requested to state whether he desires to make any alteration in any nomination made under the rules of the

subscriber had made no nomination in favour of a member of his family or in favour of his having no family at the time of his death, and if so, whether he desires to make any nomination in favour of a member of his family or in favour of his having no family thereafter the fact should be reported to the Accounts Officer forthwith together with a formal request to satisfy himself as to the correctness of the statement and to bring errors, if any, to the notice of the Accounts Officer, within three months from the date of its receipt.

38

3/15/02

Backpack

R

Tas Program

1-1

1-1-1

1-1-1

Sup. Celexiply

2-2-2

Medical Director
Hospital Kohang

[Signature]

[Signature]

[Signature]



Medical Office
AM/DHQ Hospital Kobat

Tas. Welgana
1-17

Cop. Feldman
1-17

of Sgar in the

c/o Las Backen
Limboyo

1/17/68
1-17

Backen
Limboyo

1-17
2/8/68

c/o Las Backen
Limboyo

Tas. Dickson
1-17



Medical Office
AM/DHQ Hospital Kobat

Tas. Alonzo

Tas. Paredot
1-17



65

OUT DOOR PATIENT TICKET

Health Department

Patient No. _____

Sent To:

City Name _____

Name _____ Age: _____ Sex: M

Address / Husband's Name _____

Date: 17/11/2008

OPD No. 5327 Monthly OPD No. _____

Clinical Diagnosis: Lumbago

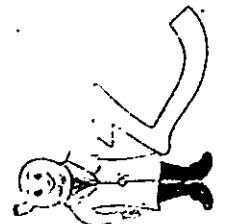
Findings / Investigations / Treatment / Referred

*MR. J. (Lumbago)
Spine (report)*

MEDICAL OFFICER
DR. J. K. KOBBI
KDA, Kobbe

*Backache
Lumbago*

V. varan / m. s. f. c.



10.5. C. (report) - P

MEDICAL OFFICER
DR. J. K. KOBBI
KDA, Hospital Kobbe

(Handwritten signature)

Mantaz Begum

41452

16.12.2003

Rickettsia

g. muscog. 1 cm sh

g. Felder flash
1.7.1.

g. rounded
1.7.1.

MEDICAL OFFICER
D. HOSPITAL, KDA, KOD

Ad. rest 7m days

16.12/03

No.

Rs. 5/-

OUT-PATIENTS DEPARTMENT

NAME Mantaz Begum

YEARLY NO. 39657

DATE 11/12/03

DISEASE

scatica

g. Norm - 1 cm
1.7.1.

g. Distalgie
1.7.1.

g. smect-2

MEDICAL OFFICER
D. HOSPITAL, KDA

Ad. rest - 02 weeks

01/12/03

FACE VALUE RUPEES

NAME Muntaj Begum
EARLY NO 38653
DATE 15/10/03
DISBASE

22/10/03
BMC/2003

Rs. Bm/2003

Ms. Mem - edo
- - - - -

Ad. 15/10/03 on ward

MEDICAL OFFICER
DHO HOSPITAL, DAVANAGER

32

Muntaj Begum
11/12/2003

Bm/2003

MMS/2003 / 10/10/03

Ms. Fildem Hashir
11/11/03

Ad. 11/11/03

MEDICAL OFFICER
DHO HOSPITAL, DAVANAGER

Ad. 16/12/03

16/12/03

Handwritten signature

شعبہ 20



ایڈویکٹ دستخط:

بار کونسل ابار ایسوسی ایشن نمبر: 1596

رابطہ نمبر: 9151863-0300



1000



43

کوہاٹ بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب:

منجانب: <i>M. J. Khan</i>		دعویٰ:
مہتمما علیہ السلام		علت نمبر:
		مورخہ:
		تھانہ:

بابت تحریر آنکہ

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

آن مقام سے *Bar Assn* کے *جو* *جو* *جو* کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اہتمام ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے پر تیار ہوگا، نیز جواب دعویٰ اپیل دعویٰ اور درخواستیں از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ اپیل کی درخواستی اور منسوخی، نیز دائر کرنے اپیل غلطی و پیروی کرنے کا اختیار ہوگا، اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل صاحب کو توفیق دینے اور اسے اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ ذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر ماتحت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے واسطے سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابندی ہوں گے کہ پیروی نہ کرے اور اس کا نام لکھ دیا تاکہ سند رہے۔

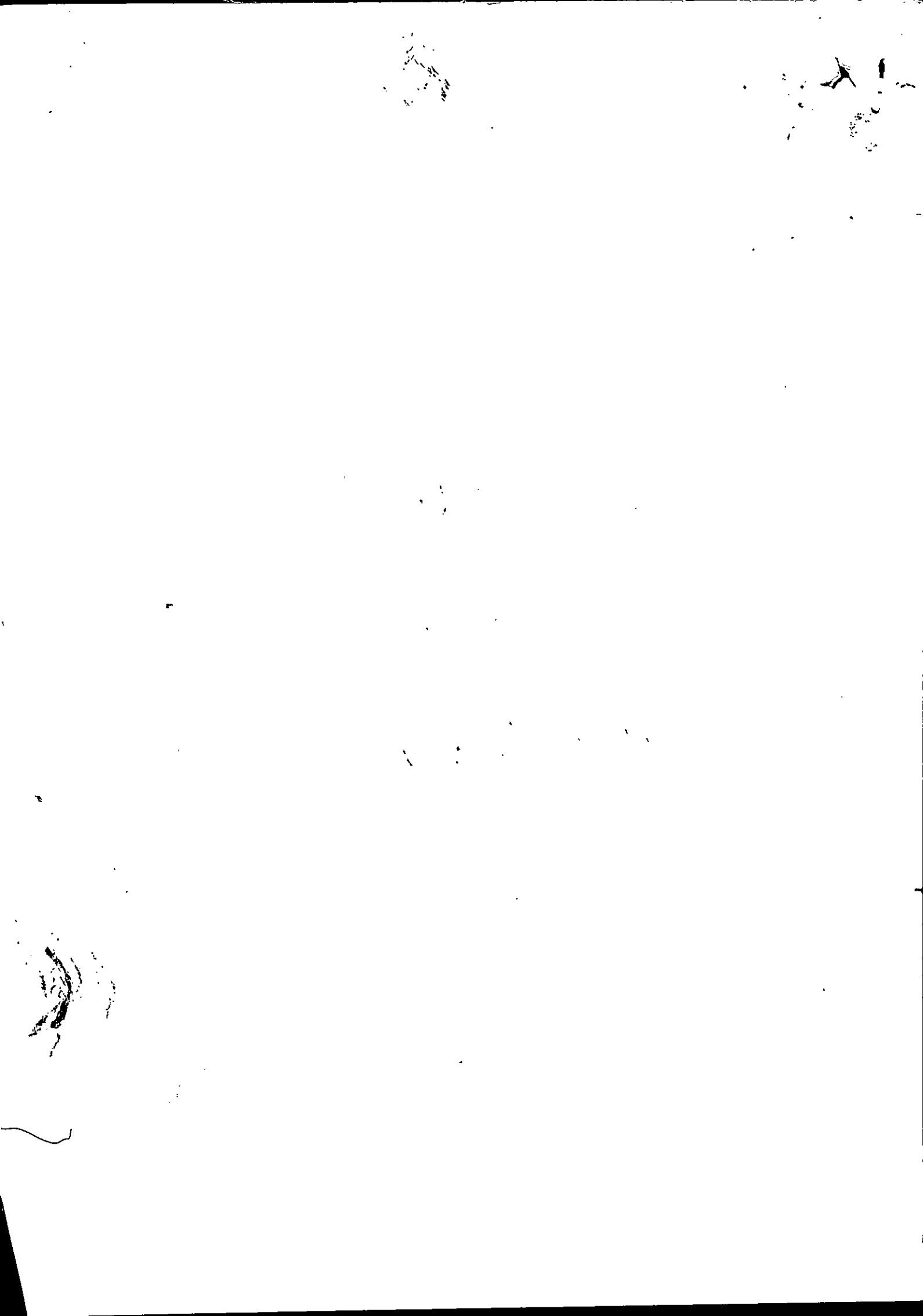
Kohat

المبداً گواہ شد المبدأ

مقام سے *جو* *جو* *جو* کیلئے منظور ہے۔

نوٹ: اس نکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

M. J. Khan



THE HON'ABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA , PESHAWA

SERVICE APPEAL NO; 757-P/2018

1. Mst Mumtaz Begum Ex- CT GGHSS Shakardarra **Appellant**

VERSUS

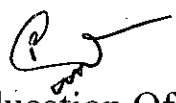
District Education Officer (Female) Kohat & other.... **Respondents**

INDEX

S#	Description of the Documents	Annex	Pages
1	Para wise comments		1-3
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7	Photo copy of letter No: 4862 dated 20.06.2005	E	9
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Dated 25-09-2019

Respondent No: 3 .


District Education Officer
(Female) Kohat

(1)

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

APPEAL NO. 757/2018

Mst: Mumtaz Begum CT GGHS Shakardarra..... Appellant

Versus

1. Govt: of Khyber Pakhtunkhwa through Chief Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar
2. Director, Elementary and Secondary Khyber Pakhtunkhwa Peshawar
3. District Education Officer (Female) Kohat
4. Sub: Divisional Education Officer (F) Elementary and Secondary Education, Kohat

REPLY ON BEHALF OF RESPONDENT

PRELIMINARY OBJECTION

1. That the appellant has got no cause of action / locus standi to file present appeal.
2. That the appellant has not come to honourable service tribunal with clean hand.
3. That the appellant has suppressed / concealed material fact from the honourable service tribunal.
4. That the present appeal is barred by time.
5. That the present appeal is bad in its present form hence not maintainable and liable to be dismissed with cost.

FACT:

1. No Comments, pertain to record
2. Incorrect, the appellant was appointed as CT since 23-09-1981 and mostly remained on different kind of leave with pay or without pay throughout her service career upto 01-09-1999 (statement /sketch prepared from record is attached as annexure 'A' thereafter, she proceeded on EOL without pay w.e.f. 01-09-2000 to 31-08-2001(365), after expiry of leave she became willful absent from duty w.e.f. 01-09-2001 as reported by Head mistress GGHS Shakardarra Kohat the immediate boss of appellant (copy attached as annexure 'B', three absent notices had been sent to the appellant on home address. Finally absent notice published in daily Mashriq dated 27-03-2002 by Head Mistress of said school (Copy attached as annexure 'C'. in the meanwhile she resumed duty on 4-2-2002. The Head mistress again reported that the appellant applied for Medical leave w.e.f. 15-10-2003 to 30-05-2004 without supporting medical certificate of authorized medical officer (copy attached as annexure 'D'. again Head mistress of said school furnished communication that she remained willful absent from duty w.e.f. 1-10-2004 to 24-06-2005, in response of DO (F) letter No 4862 dated 20-06-2005 just resumed duty on 25-06-2005 for one day and again became absent, consequently the service of appellant

has been removed vide EDO S&L Endst. No 6111-15 dated 22.07.2005 under Removal from service (Special powers ordinance 2000) copy attached as Annexure 'F'.

- 3. Incorrect, that service of appellant fall under the direct domain of Head mistress of GGHSS Shakardarra, the appellant was supposed to submit casual leave, application to their immediate boss (HM), respondents department have no concern to deal such like issue of high/higher secondary schools, moreover the appellant is failed to mention exact date and period of casual leave applied for, which also hints some thing else.
- 4. Incorrect, an application of appellant was forwarded to DG health and Medical Supdt: DHQ Hospital Kohat, consequently, Medical Board has been constituted, and the appellant was informed accordingly to appear before standing medical board, but she failed to do so, and MS of concerned Hospital extended the date, but thereto, she failed to appear before board. Photo copies of all correspondence as annexure ' G,H,I,J,K,L & M as well as statement of appellant concerned are attached as annexure 'N'
- 5. Incorrect, under the provision of civil services pension rules, 1963 chapter II para 2.11(C), the appellant is not entitled to grant pension of benefits as her past service has been forfeited owing to long absenteeism or Removal from service (coy attached as annexure 'O'
- 6. Incorrect Service appeal filed before the appellate authority after the judgment passed on in the instant case by this Hon'able Service Tribunal Khyber Pakhtunkhwa and there is no bar on appellate authority to entertain the time barred appeal which is already decided by this Hon'able tribunal.

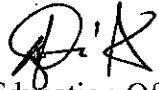
GROUND:

- A. Incorrect, the appellant has been dealt in accordance with rules/regulation.
- B. Incorrect, the order issued by the defunct office of the Executive District Officer Elementary & Secondary Education Kohat absolutely unbiased after observing all codal formalities as the appellant her self admitted that she perform duty w.e.f. 23.09.1981 till 15.10.2003and now after lapse of about 15 years approached for Pensionery benefit on superannuation on attaining the age of 60 years irrespective of the fact that she remain deliberately absent for the long period and even did not bother to contact about her service career with her immediate officer but instead promote her family dynasty with her Brother in law ho was serving as Lt. Col in Pak Army after retirement perform duty as Principal Scout cadet college Warsak Peshawar.
- C. Incorrect, It was not obligatory upon the respondent Department to comments on the badly time barred departmental appeal under limitation act
- D. Incorrect. All relevant documents are attached as Annexure mentioned in para 2 above.
- E. Incorrect, as stated vide para D above.
- F. Incorrect, the removal order is quite in accordance with law in vogue.
- G. Incorrect, the office order dated 03.03.2008 was corrected through corrigendum issued by defunct office of EDO E&SE Kohat of even No & dated.
- H. Incorrect the service book is still lying in the custody of appellant.

- I. Incorrect as stated vide para 5 above
- J. Incorrect as stated vide para 4 above

The respondent's Deptt would adduce some other ground at the time of arguments.

It is therefore humbly prayed that on acceptance of this reply, instant appeal may kindly be dismissed with cast.



Sub: Divl: Education Officer
(Female) Kohat
Respondent No. 4



District Education Officer
(Female) Kohat
Respondent 3



Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
Respondent 2

BEFORE THE HON'ABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA , PESHAWA

SERVICE APPEAL NO; 757-P/2018

1. Mst Mumtaz Begum Ex- CT GGHSS Shakardarra **Appellant**

VERSUS

District Education Officer (Female) Kohat & other.... **Respondents**

Affidavit

I, Mrs. Farzana Sardar District Education Officer (Female) Kohat do hereby solemnly affirm and declare on oath that the contents of the accompanying Parawise comments are true and correct to the best of my knowledge and belief and nothing has been concealed withheld from this Honourable court.

Deponent



DISTRICT EDUCATION OFFICER
OFFICE (FEMALE) KOHAT

Annex: "A" p-5

BRIEF HISTORY OF LEAVE IN RESPECT OF MISS MUMTAZ BEGUM, C T

G.G.H.S. SHAKARDARA (KOHAT) LAST 15 Years

<u>S.No.</u>	<u>Period of Leave</u>	<u>Leave availed</u>	<u>Nature of Leave</u>
1.	2. 10.1986 to 9.10.1986	07 days on full pay	Medical Leave
2.	9. 10.1986 to 15.10.1986	07 day without pay	Medical Leave
3.	21.10.1989 to 23.11.1989	34 days on full pay	Medical Leave
4.	30.10.1993 to 19.11.1993	21 days on full pay	Medical Leave
5.	01.02.1994 to 09.02.1994	08 days on full pay	Medical Leave
6.	09.02.1994 to 29.03.1994	49 days without pay	Medical Leave
7.	04.10.1994 to 17.11.1994	45 days on full pay	Maternity leave
8.	24.11.1994 to 01.01.1995	39 days without pay	Medical Leave
9.	13.02.1995 to 28.02.1995	16 days without pay	Medical Leave
10.	20.05.1997 to 28.07.1997	69 days without pay	Medical Leave
11.	01.01.1998 to 25.01.1998	05 days on full pay	Earned Leave
12.	06.01.1998 to 31.5. 1998	146 days without pay	Earned Leave
13.	25.08.1998 to 27.8. 1998	03 days on full pay	Medical Leave
14.	28.08.1998 to 31.12.1998	96 days without pay	Medical Leave
15.	02.09.1999 to 07.09.1999	06 days on full pay	Medical Leave
16.	08.09.1999 to 31.12.1999	115 days without pay	Medical Leave
17.	02.12.1999 to 01.03.1999	90 days on full pay	Maternity Leave
18.	01.09.2000 to 31.08.2001	365 days without pay	Extra Ordinary leave
19.	01.09.2001 to date		Absent

Attested:

[Signature]
District Education Officer
(Female) Kohat

[Signature]
Headmistress,
G.G.H.S. Shikardara (Kohat)

District Education Officer
Punjab (Punjab)

Annexure - B

P-5

6

864-65/F-18

Dated Shakardara the 31/12/2001

From The Headmistress,
G.G.H.S. Shakardara (Kohat)

To: 1. Quetas Noorun, O/A D/O Muhammad Jamil Khan
Moh: Tatar Khel PO: Shakardara
Tehsil & District: Kohat

2. Riffat Anis, Qaria D/O Ghulam Siddique
Village & PO: Shakardara
Tehsil & District: Kohat

Subject: ABSENCE FROM DUTY

Ref: Reference this Office letter Nos 777-78/F-13 dated 4.9.2001,
810 dated 26.10.2001 & 833-34/F-18 dated 13.11.2001.

You have been absent from duty since 1.9.2001. You are once again
again directed to resume your duty with immediate effect after receipt of
this letter. Otherwise you will be dealt under the E. & D. rules 1973.

You are also directed to explain the reason from duty for such a
pretty long turn.

[Signature]
Headmistress,
G.G.H.S. Shakardara (Kohat)

Encl: No 366/F-18

Copy of the above is forwarded to the District Officer Female Secondary
Education, Kohat for information and necessary action please.

[Signature]

[Signature]
Headmistress,
G.G.H.S. Shakardara (Kohat)

[Signature]
District Officer
Female Kohat

[Handwritten notes]

-----, NVE P. Resn

31/12/01

شکار کر کے ہاتھوں کے کوڑا لے کر پولیس کو متحرک کیا
جائے اور فٹریز ڈیپارٹمنٹ کے عمل کو یوٹھارم فراہم
کی جائے۔

سے شہری خلف امرا کے لئے مطالبہ کیا گیا ہے کہ
ملقوں نے ارباب اختیار سے پرزور مطالبہ کیا ہے کہ
مسنر صحت اشیاء فروخت کرنے والے کے خلاف
انضباطی کارروائی کی جائے۔

خان وزیر نے گورنر سرحد سے مطالبہ کیا ہے کہ ایف آر
بنوں کے لئے منکوح شدہ ڈگری کو ٹاؤن شپ میں تعمیر
کیا جائے۔

نوٹس سرحد صوبی

ذریعہ اشتہار مندرجہ ذیل زیانہ ٹیچرز گورنمنٹ گرلز ہائی سکول شکرورہ کو آخری نوٹس دیا جاتا ہے کہ وہ اس اشتہار کی اشاعت کے چند روزوں کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں کیونکہ عرصہ دراز سے بلاوجہ غیر حاضر ہیں۔ واضح رہے کہ انکو گھر کے پتے پر تین تین چار چار نوٹس بھیجوائے گئے جنکا نتیجہ انکی طرف سے کوئی جواب آیا اور نہ ہی اپنی ڈیوٹی پر حاضر ہوئی ہیں۔ اس نوٹس کی تعمیل نہ کر سکی
دور میں ان کے خلاف یکطرفہ کارروائی عمل میں لائی جائیگی جو ملازمت سے سبکدوشی بھی ہو سکتی ہے۔

نمبر	نمبر کا نام اہلہ	جس تاریخ سے غیر حاضر ہے	چشمی نمبر اور تاریخ جاری شدہ نوٹس
1	لہیدہ بیگم S.E.T	16-05-98	نمبر 406 مورخہ 3-1-2000
2	شیم اختر P.E.T	06-02-99	نمبر 688-689 مورخہ 30-4-2001
	ستار بیگم C.T	01-09-2001	نمبر 796 مورخہ 30-9-2001
	رقت انیس کا ریہ	01-09-2001	نمبر 862 مورخہ 31-12-2001
			نمبر 777-778 مورخہ 4-9-2001
			نمبر 864-865 مورخہ 31-12-2001
			نمبر 833-834 مورخہ 13-11-2001
			نمبر 777-878 مورخہ 4-9-2001
			نمبر 864-865 مورخہ 31-12-2001
			نمبر 833-834 مورخہ 13-11-2001

District Education Officer
(Female)

ہیڈ مسٹریس گورنمنٹ گرلز ہائی سکول شکرورہ کوٹاہ

27th March 2002

INF/KTI

Departments
Departments

P-8

Annexure D

8

1355

F-18

Dated

Shakardara the 16th July 2004

From The Headmistress
G.G.H.S. Shakardara (Kohat)

To The District Officer (Female) Schools & Literacy
Kohat.

Subj: APPLICATION FOR MEDICAL BOARD

Memo: This Office letter No 1677/F-18 dated 1st October 2003 was sent to your kind Office under registered letter No 1492 dated 3rd October 2003 in respect of Miss Muntaz Begum O.T of this School for Medical Board.

Now again application, Service Book (in Original) along with Medical Certificates are re-submitted for your further necessary action please.

Detail is as under please:-

S/No	Yearly No	Period	Weeks/Months
1.	35653	15.10.2003 to 30.10.2003	02 Weeks
2.	37356	30.10.2003 to 15.11.2003	02 Weeks
3.	38735	15.11.2003 to 30.11.2003	02 Weeks
4.	39657	01.12.2003 to 15.12.2003	02 Weeks
5.	11492	16.12.2003 to 26.02.2004	02 Weeks
6.	-	27.12.2003 to 25.01.2004	One Month
7.	-	26.01.2004 to 24.02.2004	One Month
8.	-	25.02.2004 to 25.03.2004	One Month
9.	-	26.03.2004 to 25.04.2004	One Month
10.	-	26.04.2004 to 25.05.2004	One Month
11.	-	26.05.2004 to 30.05.2004	One Week

It is further requested that above named teacher remained on medical leave without pay for above cited period to date. The teacher concerned may be directed for medical board if possible.

[Handwritten signature]

[Handwritten signature]
District Education Officer
(Female) Kohat

[Handwritten signature]
Headmistress
G.G.H.S. Shakardara
(Kohat)

Annex ¹/_E ³ P-9

(52)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, (SCHOOLS & LITERACY) KOHAT
NO 5862 /P.F/MUMTAZ BEGUM CT
DATED KOHAT THE 22-6 /2004.

To,

Mst:Mumtaz Begum CT
GOVT:Girls High School
Shakardara Distt:Kohat.

SUBJECT: EXPLANATION/RESUMPTION OF CHARGE.

Memo:

Reference your application nil dated 13.5.2005.

As you are well known of the fact that the post of CT from which you were proceeded on leave are still vacant and in the present circumstances there is no need of adjustment order. Hence you are directed in your own interest to report for duty to the Headmistress of your school forthwith & avoid the delaying tactics by making application for adjustment, this office straight away refuse to hear before such like tactics other-wise drastic action within the purview of special power ordinance 2000 will be initiated against you.

Burg
District Officer (Female)
Schools & Literacy Kohat.
SLC *R*

Endst:No 4863 /

Copy of the above is forwarded to the:-

The Headmistress Govt:Girls High School Shakardara with reference to her memo:No523 dated 6.5.2005 with the request to conduct & convey the contents of above memorandum to the above named teacher and communicate the factual position please.

Attested

Burg
District Officer (Female)
(Schools & Lit.) Kohat.

R
District Education Officer
(Female) Kohat

Handwritten notes and markings in the left margin, including numbers and symbols.

خدمتِ مہاراجہ ڈسٹرکٹ آفیسر سیرس اینڈ ریجنیشن (Female) کوآٹ

عنوان درج ذیل میں ممتاز بیگم سی ٹی کی دو سالہ ریجنیشن کے لیے ایک بعد حاضری



جناب عالیہ

Dated 27/9/2003

میں ممتاز بیگم سی ٹی کو ریجنیشن گزرائی

کوئی مسئلہ نہیں ہے۔

30/4/2004 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

میدیکل سرٹیفکیٹ کے فوٹو سٹیٹ کا پتلا عیاں کیے ہیں۔ اور اس کے اصل میڈیکل سرٹیفکیٹ

دفتر میں ڈائریکٹ دئے ہیں۔ میڈیکل بورڈ نے ریجنیشن دوبارہ یعنی فورم 28/9

اور فورم 08/10/2005 کی تاریخ پر اسے معائنہ معمر کی سب سے وہ دونوں دفعہ مندرجہ بالا تاریخوں

کو حاضر نہیں ہوئے۔ متعلقہ پیر کے ذریعہ معلومات مندرجہ ذیل میں

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

بورڈ سے (Apply) کیا گیا۔ اور اس سے ہمیں فورم 27/9 سے فورم 30/4 تک

Put upon file

EDD (Self)

27/9

P.T.O

District Education Officer Kohat

1159

متعلقہ میجر نے جو کوٹا بنیوں کی ہیں۔ اُس کی روشنی میں ہمیں فوری طور پر کامیاب کیا جائے
کہ عرصہ 2004-10-01 سے اب تک ہر تھکنے پر (Apply) کے بعد 9 ماہ سے حاضری کی

میجر کو کیا دیا گیا ہے۔ نام بنو گیس کو ممکن بنایا جاسکے۔
Iqbal Begum
Head Mistress
G.G.H.S.
Shakar Dara (Kohat)

Endust No- 544

Dated 28/16/2005

Copy forwarded to the:

1. Distt officer (female) Kohat.
2. Mumtaz Begum CT D/O Jamil Khan
vill: Mohala Malik Khel
P/O Shakar dara (Kohat)
3. Office Record.

Iqbal Begum
Head Mistress
G.G.H.S.
Shakar Dara (Kohat)

NOTIFICATION

1. WHEREAS, Mst: Muntaz Begum CT GGHS Shakar Darra Kohat was ~~xxxxxxx~~ proceeded against under the NWFP Removal from service (special power) ordinance 2000 on account of willfull and unauthorised absence w. e. f. 1.10.2004.
2. AND WHEREAS, The Head Mistress GGHS Shakar Darra Kohat has sent absent notice in respect of Muntaz Begum CT GGHS Shakar Darra Kohat vide letter NO 544 dated 28.6.2005.
3. AND WHERE AS, The accused teacher was served absent letter NO 516 dated 29.6.2005.
4. AND WHEREAS, The Competent authority Executive Distt: Edu: officer (Schools & Lit:) Kohat has already published absent notice against the said teacher in the Daily News Paper dt: 27.3.2002, but untill now, the said CT Teacher shirking her paramount responsibilities with one pretext or other and did not performed duty satisfactorily just join duty for one day to realize the Deptt: her existance which cannot absolve and suffice to satisfy the rule.
5. AND WHEREAS, The competent authority Executive Distt: Edu: officer (Schools and Literacy) Kohat after having considered the charges evidence on record, her response to the absence notice is of view that the charges leveled against accused official have been proved.
6. NOW THEREFORE, In exercise of power conferred under the NWFP Removal from service (Special Powers) ordinance pleased to imposed Major penalty of removal from service "Mst: Muntaz Begum CT GHSS Shakar Darra Kohat from the date of her willfull and Unauthorised absence from duty w. e. f. 1.10.2004. The Intervening period of absence w. e. f. 1.10.2004 till the issuance of Removal Notification shall be treated as unauthorised absence from duty without pay.

Attested

EXECUTIVE DISTRICT OFFICER (SCHOOLS & LIT:) KOHAT

ENDST NO. 6111-15

Date 22/7/2005

Copy of the above is forwarded to:-

1. Distt: Accounts officer Kohat.
2. Headmistress GGHS Shakar Darra Kohat.
3. Mst: Muntaz Begum CT GGHS Shakar Darra Kohat.
4. PA to EDO (S&L) Kohat.
5. Distt: officer (S & L) Kohat.

Attested

District Officer, (S&L) Kohat.

District Education Officer, (Female) Kohat.

09/11/04

19

19

District Education Office

Annexure - 9 P-110

DIRECTORATE GENERAL HEALTH SERVICES, NWFP: PESHAWAR

NO. /Medical,

Dated Pesh: the 8/11/04

The Medical Superintendent,
DHQ Hospital, Kohat.

SUBJECT: STANDING MEDICAL BOARD IN RESPECT OF MUMTAZ BEGUM OF G.C.H.S. SHAKARDARA KOHAT.

Memo:

Enclosed please find herewith a copy of letter, NO. 14052/PP-Mumtaz Begum dated 13/10/2004, from Executive District Officer Schools & Literacy Kohat,

along with its enclosures for further necessary action, w/r to Govt: of NWFP: Health Department Notification Endst: NO. SOIL/Health/6-6/93-Vol-II, dated 16-1-1999, duly endorsed vide this Directorate General Endst: NO. 773-823/Medical, dated 10-2-1999.

You are therefore, requested to please arrange his Standing Medical Board as notified vide this Directorate General Endst: NO. 861-31/Medical, dated 28-12-2001, and proceedings thereof be sent to the Executive District Officer, Schools & Literacy Kohat.

(Dr. Nadeem Ahmed)
Deputy Director (Admn:)
Directorate General Health Services, NWFP: Peshawar.

NO. 3619

/Medical,

Copy forwarded to the Executive District Officer, Schools & Literacy Kohat, for information w/r to his letter referred to above.

Handwritten notes and signatures

3372

23/11/04

(Dr. Nadeem Ahmed)
Deputy Director (Admn:)
Directorate General Health Services, NWFP: Peshawar.

District Education Officer
(Female) Kohat

10-10-1993
23/11/04

08/11/04

OFFICE OF THE EXECUTIVE DISTRICT
OFFICER (SCHOOLS & LITRACY) KOHAT

No. 1260 /PF/Mumtaz Begum CT

Dated Kohat the 29 /01/2005

To,

The Medical Supdt:
Distt:Headquarter Hospital
KDA Kohat.

SUBJECT: STANDING MEDICAL BOARD IN RESPECT OF MUMTAZ BEGUM
CT G.G.H.S SHAKARDARA KOHAT.

Memo:

Please refer Director General NWFP Peshawar memo:
No.3618 dated 8.11.2004 addressed to you and copy thereof endorsed
to this office vide Endst:No.3619 of even date on the above subje
cited above.

You are requested to arrange for standing medical
board in respect of above named teacher as asked for vide memo:
quoted above & expedite the proceedings, enabling this office to
proceed further in the matter.

o/c District Officer (Female)
Schools & Litrary Kohat

Endst:No. 1261-62 /

Copy of the above is forwarded to the:-

1. Director General Health NWFP Peshawar with ref:to his memo:No
3619 dated 8.11.2004 for information please.
2. Headmistress Govt:Girls High School Shakardara Kohat.

Attested
[Signature]
District Education Officer
(Female) Kohat

o/c District Officer (Female)
Schools & Litrary Kohat.

Annex-I P-13

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

NO. 928 /F-6

Dated Kohat 25/02/2005

To,

The District Officer (FEMALE)
School & Lit: Kohat.

Subject: = STANDING MEDICAL BOARD IN RESPECT OF MISS:
MUMTAZ BEGUM, CT, GHS SHAKARDAKRA, KOHAT.

Memo;

Ref: your letter No, 1260/PF, dated, 29.1.2005,
on the subject cited above.

It is to inform you that the Director General
Health Services, NWFP, Peshawar Memo No, 3618/ dated, 8.11.2004,
has not been received to this office ~~xxxx~~ so far.

You are hereby directed to submit (photo copy)
of letter No, 3618/ dated, 8.11.2004, to this office, so as to
proceed further into the matter.

Muhammad
25.2.05
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

NO.

/F-6,

Copy forwarded to the Director General
Health Services, NWFP, Peshawar for information and n/action,
please.

To do the necessary
early
26/2/05

Muhammad
District Education Officer
(Female) Kohat

11
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

Annexure - J P-14

OFFICE OF THE DISTRICT OFFICER,
SCHOOLS & LIBRARY, KOHAT
NO. 2592 / 1
Dated Kohat the 9th 3 / 05 / 2005

44

To,

The Medical Superintendent,
Mast Headquarter Hospital, DA,
Kohat Kohat.

SUBJECT: STANDARDIZATION OF AGE BY REGISTER OF STUDENTS
MUNTAZ FAHIM COLLEGE, SHARADIANA, KOHAT.

Re:

Reference your memo No. 228/P-6 dated 25.2.2005 on the above subject cited above.

The enclose copy of letter No. 3519 dated 8.11.2004 endorsed to this office is sent herewith for further necessary action as desired.

M. H. H. H.

o/c District Officer (Female)
Schools & Library Kohat.

P
District Education Officer
(Female) Kohat

Annexure K P-15

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

NO. 1359 /F-

Dated Kohat 24/3/2005

To,

The District Officer (FEMALE)
School & Litray, Kohat

Subject: =

STANDING MEDICAL BOARD IN RESPECT OF
MSS: MUMTAZ BEGUM, CT, GGHS, SHAKARDARRA, KOHAT

Memo;

Ref: your letter No, 2592/ dated, 9.3.2005,
on the subject cited above.

The proceedings of standing medical board
will be held on 30.03.2005 at about 9.00am in the office of
the undersigned.

Miss: Mumtaz Begum, CT, GGHS, Shakardarra, Kohat
may be re-produce to this office on the above mentioned date
time posit-ively.

Mu 305
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

28/3/05

OFFICE OF THE DISTRICT OFFICER, (SCHOOLS & LITRACY) KOHAT.

Endst: No 36/12 /PF/Mumtaz Begum Dated Kohat the 28-3-

copy of the above is forwarded to the:-

Headmistress Govt: Girls High School, Shakardara for information
and further necessary action.

Distressed
District Education Officer (Female) Kohat
105

District Officer (Female)
Schools & Litray Kohat

Annexure-2
P-16

OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

NO. 1548 /F-6,

Dated Kohat 01/4/2005.

To,

The District Officer (Female)
School & Literacy, Kohat.

Subject: = STANDING MEDICAL BOARD IN R/O MISS: MUMTAZ
BEGUM PTC GHS, SHAKARDARRA, KOHAT.

Memo;

Reference this office letter No, 1359/F-6,
dated, 24.03.2005, on the subject cited above.

It is to inform you that the proceedings
of Standing Medical Board on 30.03.2005, is expired but
Miss: Mumtaz Begum, PTC, GHS, Shakardarra, Kohat working
under your control was absent for further ne-cessary
action, please.

The next date of Standing Medical Board
is 13.04.2005 at 9.00am.

M/S 3/305
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

NO. /F-6,

Copy forwarded to the Director General
Health Services, NWFP, Peshawar for information with ref: to
his No, 3618/Medical, dated, 08.11.2004, please.

Attested

M/S
MEDICAL SUPERINTENDENT
DHQ: HOSPITAL, KDA, KOHAT

District Education Officer
Female Kohat

Annexure - M P-517

COPY OF MEDICAL SUPERINTENDANT DHQ HOSPITAL KDA KOHAT NO. 1549/F-6 DATED 13.4.2005 ADDRESS TO DO (FEMALE) S&L KOHAT AND COPY TO ALL CONCERNED.

Visible
red.

SUBJECT: STANDING MEDICAL BOARD IN R/O MISS MUMTAZ BEGUM CT CGHS SHAKARDARA KOHAT.

MEMO:-

Refernce this officer letter No.1359/F-6 dated 24.3.3005 on the above subject cited.

It is to inform you that the proceedings of Standing Medical Board on 30.3.2005 is expired but Miss Muntaz Begum CT CGHS Shakardara Kohat working under your kind control was absent for further necessary action please.

The next date of standing Medical Board is 13.4.2005 at 9.00 am.

Sd/-
MEDICAL SUPERINTENDENT
DHQ:HOSPITAL,KDA KOHAT.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITRACY) KOHAT.

Endst:No 28-99 /FF/Mumtaz Begum Dated Kohat the 8.4. /2005

Copy of the above is forwarded for information to the:-

- 1. Mst:Mumtaz Begum CT Govt:Girls High School Shakardara Kohat with the remarks that next date for Medical Board has been fixed on 13.4.2005 at 9.00 AM at DHQ KDA Kohat.

You are once again directed to be present on date fixed at above otherwise strict disciplinary action will be taken against you

- 2. The Medical Supdt:Distt:Headquarter Hospital KDA Kohat with refernce to his no.cited above with the request to please correct the ~~designation~~ designation of the above named mistress as already intimated in the letter No.2592 dated 9.3.2005 (that she is CT not PTC)

Attested

Distt:Officer (Female)
Schools & Litrary Kohat

[Signature]
District Education Officer
(Female) Kohat

Regd

عنوان: ایڈجسٹمنٹ برائے جی. پی. اے. پوسٹ بورڈ ٹیچر حاضری

12/5/05

صاحب عالی

12/5/05

ورد بند گزارش ہے کہ میں ٹیچر 20 سال سے بیمار ہوں۔ بیماری کا شدت دن بدن بڑھتی جا رہی ہے۔ جس کے وجہ سے میں صوفیہ 30/9/04 تک صحت یکل افسر تھی۔

اب دوبارہ صحت کرائے پر بیٹھ چلا کہ بیماری میں بٹھری کے آثار پیدا ہو گئے ہیں۔ اس دوران صحت یکل جگہ گورنمنٹ گورننگ اسکول شکرہ کی جانب سے ٹوٹن نمبر 523 صوفیہ 6/5/05 سے میں ڈیوٹی پر حاضر ہونے کا حکم تھا۔ جس کے وجہ سے میں اسکول خذوڑہ میں حاضر ہونا چاہتی ہوں مگر طویل عرصہ کا قریب سے صحت یکل ایڈجسٹمنٹ ضروری ہے۔ لہذا آپ صاحبین سے استدعا ہے کہ صحت یکل ایڈجسٹمنٹ آرڈر جاری فرمایا جائے تاکہ میں اپنی پوسٹ پر جا سکیں۔

اس لیے آپ صحت یکل ایڈجسٹمنٹ آرڈر جاری فرمایا جائے۔

صحت یکل ایڈجسٹمنٹ آرڈر جاری فرمایا جائے۔

12/5/05

I.A.E
13/5/05

ایڈجسٹمنٹ برائے جی. پی. اے. پوسٹ بورڈ ٹیچر حاضری

M. M. M.

ایڈجسٹمنٹ برائے جی. پی. اے. پوسٹ بورڈ ٹیچر حاضری

(2) only completed years upto a maximum of five years shall count and the residue of war service shall not be counted under sub-rule (1).

If the entire military service, including war service is dealt with under sub-rule (1), the whole of the gratuity received in lieu of pension (but not that given as a reward of war service) shall have to be refunded by the Government servant concerned. If, however, the portion which was war service is dealt with under sub-rule (2) and the rest of the military service before or after the war under sub-rule (1). The amount of gratuity which the Government servant will refund in respect of the latter portion shall bear the same proportion to the total amount of gratuity received in lieu of pension the period dealt with under sub-rule (1) bears to the total period of military service, including the period of war service.

For the purpose of this note it is immaterial whether or not there was a break between the war service and other military service.

2.9 **Deputation** – Time spent by a Government servant holding pensionable post on deputation to (1) another Government (2) foreign service, or (3) service in a temporary or non-pensionable post under Government counts for pensions as if it were a time spent under the Government.

Note. **Rule of Proportion.** The 'Rule of proportion' and the other associated rules and accounting instructions shall continue to be operative and the apportionment of pensionary liability between the various Departments and Federal / Provincial Governments, as the case may be, shall be made by the audit and Accounts Officer issuing a Pension Payment Order. Finalization of pension cases shall not be held up on this account. If there is any dispute with regard to the apportionment of pensionary liability, the matter should be sorted out by the Audit and Accounts Officers involved. The authorities concerned are required to forward the pension case of the retired government servants to the audit office concerned. Complete in all respects and with the documents mentioned in (Annex).

No. SOSR-III(FD)4-36/75(Vol-II), FD-
Khyber Pakhtunkhwa,
Dated Peshawar, the 28th April, 1991.

2.10 **Suspension** – If a Government servant is suspended from service pending enquiry into his conduct, the period of suspension counts for pension if it is immediately followed by reinstatement, unless the Government servant reinstated with forfeiture of a part of his pay or allowances for the period of suspension.

2.11 **Forfeiture of Past Service** – A Government servant forfeits his past service in the following cases: -

- ✓(a) Resignation of a post unless it is to take up another post service in which counts for pension.
- ✓(b) Removal or dismissal from service.
- ✓(c) Absence from duty without leave.

D. A. Akhtar
District Education Officer
Kohat

20/1/2021

~~Sham Nawaz - impugned order dt 27/12/~~

BDA

Munazz Begum :: impugned order - 22/7/2005

Dept appeal 5-3-2018. Time barred

No condonation

Reply - Para A -

- 2075 CMR 346 :-
- 2004 SCMR 1426
- PLJ 2009 SC 1099.
- PLD 2006 SC 572
- C.P 1706/2018 S.C dt 16/11/2020
- S.A 381/2019 dt 2/12/2019
- S.A 1662/2013 dt 29/11/2018

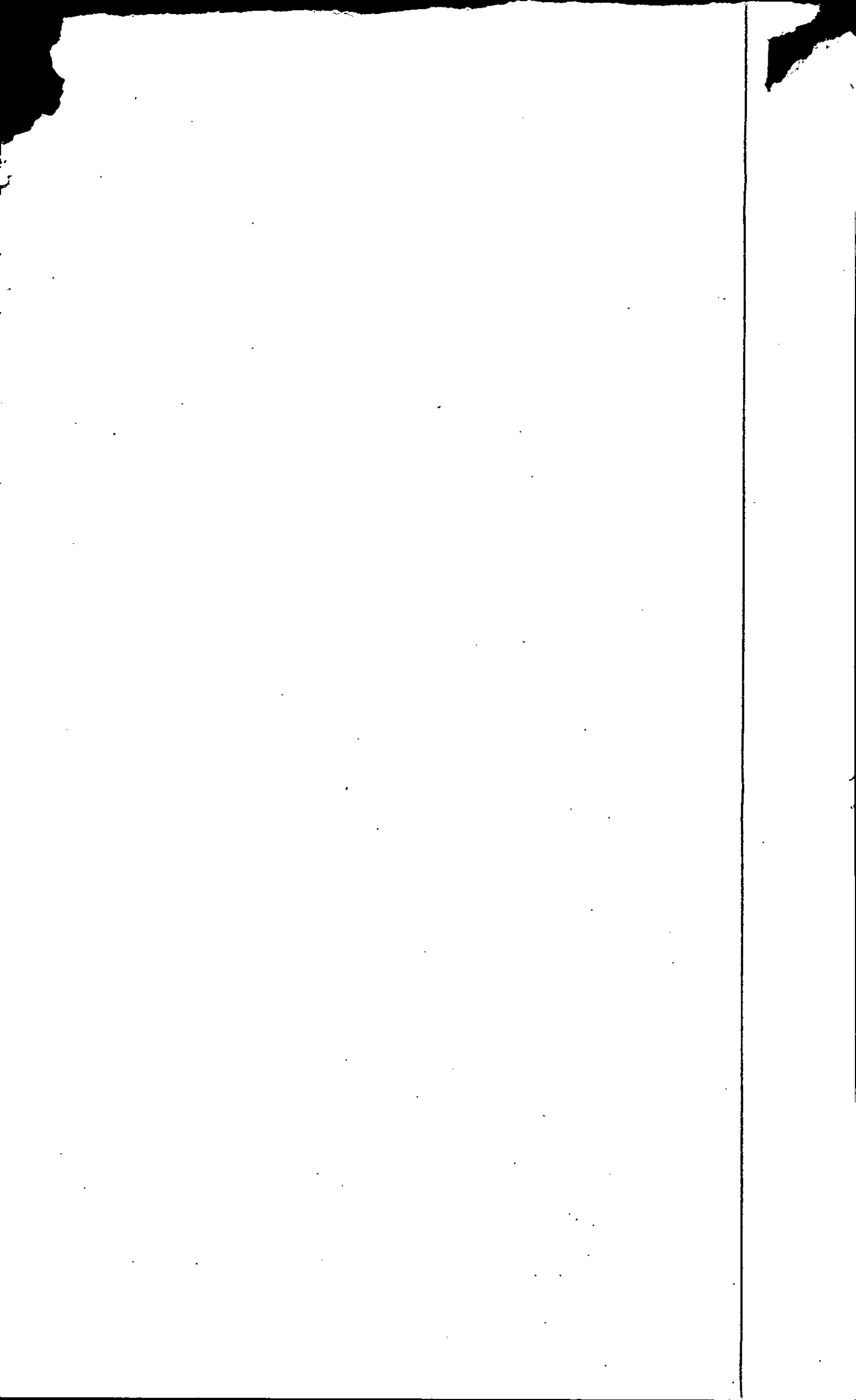
2004 PL(CS) 8217 limitation

2004 SCMR 527

1997 SCMR 987

P15 of reply - P119 (2.11)

Rebuttal. No show cause - No news paper.
No inquiry.



BEFORE THE KHYBER PAKHTUNKHWA, PESHAWAR

C.M No. _____/2019
In Service Appeal No.757/2018

Mumtaz Begum.....Petitioner

Versus

Govt. of KPK & others.....Respondents

*put up to the court with
relevant appeal*

**APPLICATION FOR PLACE ON FILE ORDER
VIDE DATED 07.02.2018 PASSED BY THIS
HON'BLE TRIBUNAL**

12/2/19

Respectfully Sheweth:

1. That the above titled service appeal has fixed before this Hon'ble Tribunal on 05.03.2019 in preliminary hearing.
2. That the above mentioned order, has not been annexed with the appeal inadvertently which is necessary for the just decision of case.

It is, therefore humbly prayed that or acceptance of this application, the above mentioned order may kindly be allowed to be placed on file.

Appellant

Through

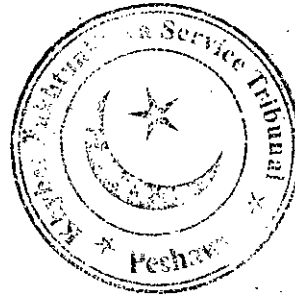
Hassan U.K Afridi
Advocate High Court

Dated 12.02.2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. 666 /2017



Khyber Pakhtunkhwa
Service Tribunal

Diary No. 652

Dated 12-6-2017

Mumtaz Begum, C.T, Government Girls High School,
Shakar Darra, Kohat.....**Appellant**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
 2. Director Elementary & Secondary Education, Peshawar
 3. District Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
 4. Sub Divisional Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
-**Respondents**

Filed to-day

Registrar

12/6/17


**APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE DENIAL OF
RESPONDENTS TO GRANT PENSIONARY
BENEFIT TO THE APPELLANT UNDER THE
LAW /RULES**

Re-submitted to -day
and filed.

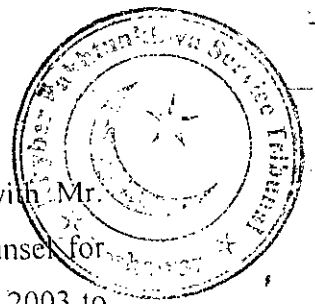
Registrar

19/6/17

Certified to be true copy


Registrar
Peshawar


Appeal No. 666/2017
Muntaz Begum vs Govt




07.02.2018

Counsel for the appellant and Addl: AG alongwith Mr. Sher Nawab, Supdt for respondents present. Learned counsel for the appellant argued that she applied for leave from 15.03.2003 to 3.05.2014. Order regarding sanction of leave is not available on the record. It is also not clear whether services of the appellant have been dispensed with order otherwise? That she attained the age of superannuation on 31.03.2015 and is entitled for pensionary benefits. She filed departmental appeal on 27.02.2017 which was not responded, hence, the instant service appeal. Vide order sheet dated 31.07.2017 certain clarifications were sought from learned counsel for the appellant and pre-admission notice was also issued to the respondents. Representative of the respondents produced order dated 22.07.2005 through which major penalty of removal from service was imposed on the appellant. As above order has not been assailed through the instant appeal, hence, the same is become infructuous and is hereby dismissed limine. File be consigned to the record room.

Announced:
07.02.2018


Ahmad Hassan
Member (E)

Certified to be true copy

Khyber Pakhtunkhwa
Services Tribunal,
Peshawar

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BEFORE THE KHYBER PAKHTUNKHWA, PESHAWAR

C.M No. _____/2019
In Service Appeal No.757/2018

Mumtaz Begum.....**Petitioner**

Versus

Govt. of KPK & others.....**Respondents**

**APPLICATION FOR PLACE ON FILE ORDER
VIDE DATED 07.02.2018 PASSED BY THIS
HON'BLE TRIBUNAL**

Respectfully Sheweth:

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Appellant
Through

Dated 12.02.2019

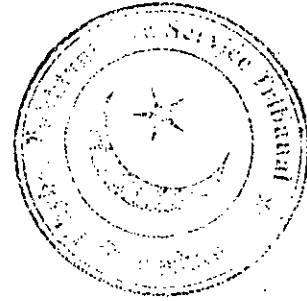
Hassan U.K Afridi
Advocate High Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. 666 /2017



Khyber Pakhtunkhwa
Service Tribunal

Diary No. 652

Dated 12-6-2017

Mumtaz Begum, C.T, Government Girls High School,
Shakar Darra, Kohat.....**Appellant**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
 2. Director Elementary & Secondary Education, Peshawar
 3. District Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
 4. Sub Divisional Education Officer (Female) Elementary & Secondary Education, K.D.A, Kohat
-**Respondents**

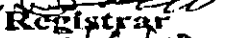
Filed to-day


Registrar

12/6/17

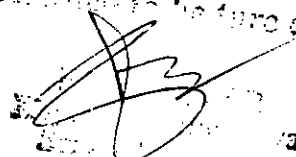
**APPEAL UNDER SECTION 4 OF THE KHYBER
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BENEFIT TO THE APPELLANT UNDER THE
LAW /RULES**

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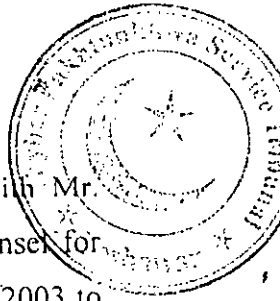

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19/6/17

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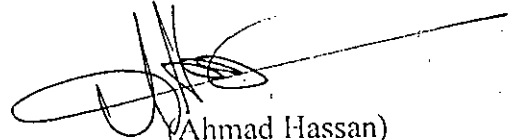
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Announced:
07.02.2018


Ahmad Hassan)
Member (E)

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Secretary (General),
Peshawar

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