

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT SWAT

SERVICE APPEAL NO. 1302/2018

Date of institution ... 15.10.2018

Date of judgment ... 07.01.2020

Mst. Parveen Akhtar, Daughter of Khan Zada, Resident of Village & P.O Amir Abad,
Chackdara, Tehsil Adenzai, District Dir Lower. ... (Appellant)

VERSUS

1. District Education Officer (Female) Dir Lower at Timergara.
 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
 3. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
- ... (Respondents)

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974.

Mr. Abdul Qayum, Advocate

.. For appellant.

Mr. Usman Ghani, District Attorney

.. For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

MR. HUSSAIN SHAH

.. MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Counsel for the

appellant Mr. Usman Ghani, District Attorney for the respondents present.

Arguments heard and record perused.

2. Brief facts of the case as per present service appeal are that the appellant was appointed as Primary School Teacher vide order dated 24.06.1997. She was transferred from Government Girls Primary School Landi Shah Warai to Government Girls Primary School Umaray Karamay Asbanr vide order dated 27.08.1998. Again on her request she was adjusted at Government Girls Primary School Gambir Mayar by the competent authority

M. Amin
7.1.2020

vide order dated 13.12.1999 but thereafter, the appellant was informed verbally that the above adjustment order was not proper. The appellant filed departmental appeal for her adjustment after 19 years on 07.07.2018 but the same was also not responded hence, the present service appeal.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant was appointed by the respondent-department as Primary School Teacher in Government Girls Primary School Landi Shah Warai District Dir Upper vide order dated 24.06.1997. It was further contended that she was transferred by the respondent-department from Government Girls Primary School Landi Shah Warai District Dir Upper to Government Girls Primary School Umaray Karamay Asbanr District Dir Lower vide order dated 27.08.1998. It was further contended that thereafter, the appellant was adjusted and directed to work at Government Girls Primary School Gambir Mayar District Dir Lower vide order dated 13.12.1999. It was further contended that the appellant was informed that the above adjustment order was not a proper therefore, the appellant time and again visited the office and also submitted departmental appeal but in vain. It was further contended that the respondent-department was bound to adjust her at any school. It was further contended that so far no adverse order regarding dismissal and removal from service has been passed by the competent authority nor any inquiry/show-cause notice has been issued to the appellant, therefore, the respondent-department is bound to adjust her with all back benefits and prayed for acceptance of appeal.

5. On the other hand, learned District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended

M. Anwar
7.1.2020

that neither there is any original order nor there is any final order made by the departmental authority against the appellant, therefore, the present service appeal is not maintainable under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. It was further contended that the appellant remained absent from duty without the permission of the lawful authority and without any sanction of leave from 22.12.1999 for a period of 19 years. It was further contended that her total length of service was two years five months and twenty six days and she remained absent from duty for a long period of 19 years and after 19 years she filed departmental appeal for her adjustment, therefore, it was contended that her departmental appeal is also time barred and the respondent-department has rightly not adjusted her in any school after 19 years of her absence and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant was appointed as Primary School Teacher vide order dated 24.06.1997. She was transferred from Government Girls Primary School Landi Shah Warai, District Dir Upper to Government Girls Primary School Umaray Karamay Asbanr District Dir Lower vide order dated 24.08.1998. Later on, she was adjusted at her request at Government Girls Primary School Gambir Mayar vide order dated 13.12.1999. The appellant remained absent from duty since 1999 and she approached the department through department appeal dated 07.07.2018 after 19 years for her adjustment with back benefits in any school. Though the learned counsel for the appellant contended that the appellant was informed verbally that aforesaid adjustment order dated 13.12.1999 was not proper, therefore, the appellant time and again visited the office and submitted departmental appeal for her adjustment but the record reveals that she had filed departmental appeal after 19 years on 07.07.2018. Had she visited the office time and again

*M. Anwar
21.12.2020*

to the office for her adjustment she would have annexed applications/departmental appeals. Soon after her adjustment order dated 13.12.1999 but she has not annexed such in time application/departmental appeal to the competent authority for her adjustment. Meaning thereby, that she remained absent for 19 years without the permission of the competent authority for the reason best known to her. Moreover, under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, a civil servant is required to file service appeal against any final original or appellate order passed by the departmental authority but the appellant has not challenged in service appeal any such final order passed by the competent authority or made by the departmental authority, therefore, the appeal is also not maintainable on this ground. As such, we see no merit in the appeal hence, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
07.01.2020



(HUSSAIN SHAH)
MEMBER
CAMP COURT SWAT




(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT SWAT

03.12.2019

Husband of the appellant on behalf of the appellant present. Mr. M. Riaz Khan, Paindakhel, Assistant Advocate General for respondents present. Husband of the appellant seeks adjournment. Adjourn. To come up for arguments on 07.01.2020 before D.B at camp court Swat.


Member



Member
Camp Court Swat

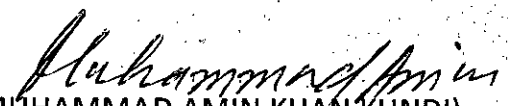
07.01.2020

Counsel for the appellant Mr. Usman Ghani, District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today consisting of four pages placed on file, we see no merit in the appeal hence, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
07.01.2020


(HUSSAIN SHAH)
MEMBER
CAMP COURT SWAT


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT SWAT

DFA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT SWAT

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Date of institution ... 15.10.2018

Date of judgment ... 07.01.2020

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VERSUS

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2. Director Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
3. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
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.. For appellant.

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.. For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

MR. HUSSAIN SHAH

.. MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Counsel for the
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order dated 27.08.1998. Again, ^{on} her request she was ~~directed~~ adjusted at
Government Girls Primary School Gambir Mayar by the competent authority.

A 70

Annex 14

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DIR LOWER.

OFFICE ORDER

As per direction by the worthy Director (E&SE KPK Peshawar recorded on the body of application, Mr. ~~Faiz Mohammad SST(G)~~ GHS Badwan is hereby transferred to ~~GMS Fanger Payoon~~ against vacant post in the interest of public service with immediate effect :-

Note:- 1.No TA/DA is allowed.

2.Charge report should be submitted to all concerned.

(Hafiz Dr; Mohammad Ibrahim)
District Education Officer
(Male) Dir lower.

Endst;No, ~~10813-16~~ / Dated Timergara the ~~24/9~~ /2018

Copy forwarded to:-

1. The District Accounts Officer Dir lower.
2. The Deputy District Edu; Officer (M) Local office.
3. The Principal/Headmaster concerned.
4. The Teacher concerned.

[Handwritten signature]

[Handwritten signature]
District Education Officer
(Male) Dir lower

vide order dated 13.12.1999 but thereafter, the appellant ~~remained absent~~ ^{was informed} ~~verbally that the above adjustment order was not proper~~ from duty for the reason best known to her and later on the appellant filed

departmental appeal for her adjustment after 19 years on 07.07.2018 but the same was also not responded hence, the present service appeal.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant was appointed by the respondent-department as Primary School Teacher in Government Girls Primary School Landi Shah Warai District Dir Upper vide order dated 24.06.1997. It was further contended that she was transferred by the respondent-department from Government Girls Primary School Landi Shah Warai District Dir Upper to Government Girls Primary School Umaray Karamay Asbanr District Dir Lower vide order dated 27.08.1998. It was further contended that thereafter, the appellant was adjusted and directed to work at Government Girls Primary School Gambir Mayar District Dir Lower vide order dated 13.12.1999. It was further contended that the appellant was informed that the above adjustment order ^{was} is not a proper therefore, the appellant time and again visited the office and also submitted departmental appeal but in vain. It was further contended that the respondent-department was bound to adjust her at any school. It was further contended that so far no adverse order regarding dismissal and removal from service has been passed by the competent authority nor any inquiry/show-cause notice has been issued to the appellant, therefore, the respondent-department is bound to adjust her with all back benefits and prayed for acceptance of appeal.

5. On the other hand, learned District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended

سجل

تاریخ	03	07	03	10	03	07	03	07	03	07
ملاحظات										

ردیف	تاریخ	شرح	ملاحظات	تاریخ	شرح	ملاحظات
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مجموعه سنجش و ارزیابی عملکرد

تاریخ: 1395

محل: ...

14

15

that neither there is any original order nor there is any final order made by the departmental authority against the appellant, therefore, the present service appeal is not maintainable under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. It was further contended that the appellant remained absent from duty without the permission of the lawful authority and without any sanction of leave from 22.12.1999 for a period of 19 years. It was further contended that her total length of service was two years five months and twenty six days and she remained absent from duty for a long period of 19 years and after 19 years she filed departmental appeal for her adjustment, therefore, it was contended that her departmental appeal is also time barred and the respondent-department has rightly not adjusted her in any school after 19 years of her absence and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant was appointed as Primary School Teacher vide order dated 24.06.1997. She was transferred from Government Girls Primary School Landi Shah Warai, District Dir Upper to Government Girls Primary School Umaray Karamay Asbanr District Dir Lower vide order dated 24.08.1998. Later on, she was adjusted at her request at Government Girls Primary School Gambir Mayar vide order dated 13.12.1999. The appellant remained absent from duty since 1999 and she approached the department through department appeal dated 07.07.2018 after 19 years for her adjustment with back benefits in any school. ~~When~~ ^{Through the} learned counsel for the appellant contended that the appellant was informed verbally ^{that} aforesaid adjustment order dated 13.12.1999 was not proper, therefore, the appellant time and again visited the office and submitted departmental appeal for her adjustment but the record reveals that she had filed departmental appeal after 19 years on 07.07.2018. Had she visited the office time and again to the office

Amir E...
 ددر باس
 بابت ماه سپتمبر
 ناصر حاضری ندر سین

کتابچه حساب
 7:7

روز	ساعت	کار	مکان	نوع	تعداد	ملاحظات
1	6-130	6	6	3	3	
2	6-130	6	6	3	3	
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31	6-130	6	6	3	3	

روز	ساعت	کار	مکان	نوع	تعداد	ملاحظات
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دستخط میزبان

for her adjustment she would have annexed applications/departmental appeals. ~~But~~ ^{SON} after her adjustment order dated 13.12.1999 but she has not annexed such in time application/departmental appeal to the competent authority for her adjustment. Meaning thereby, that she remained absent for 19 years without the permission of the competent authority for the reason best known to her. Moreover, under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, a civil servant ~~may be preferred departmental~~ ^{is required to file service} appeal against any final original or appellate order passed by the departmental authority but the appellant has not challenged in service appeal any such final order passed by the competent authority or made by the departmental authority, therefore, the appeal is also not maintainable on this ground. As such, we see no merit in the appeal hence, the same is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
07.01.2020

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT SWAT

(HUSSAIN SHAH)
MEMBER
CAMP COURT SWAT

15

CERTIFICATE OF TRANSFER OF CHARGE.

1. Certify that we have on the 19/09/2018 (F.N) of this day respectively made over and received charge of this office of the SST (G) post at Govt; Middle School Tangi Payeen Khadagzai Dir (L) order vide D.E.O (E & S) Education (M) his office Endost:No.10499-10503 Dated 17/09/2018 vacant post.
2. Particulars of Cash and important secret and confidential documents handed over are noted on the reverse:-

C.T.C

Signature of relived
 Government Servant vacant post
 Designation

[Signature]
 SST (G)
 (Khadagzai Distt: Dir(L))

Station: GMS, Tangi Payeen Khadagzai Dir (L).

Signature of Government
 Servant receiving
 Charge
 Designation

[Signature]
 Ihsan ul Haqad Master
 SST (G) G.M.S. Tangi Payeen
 (Khadagzai Distt: Dir(L))

Endost:No. 427-437 Dated 19/09/2018.

Submitted for information to the:-

1. District Education Officer (E & S) (M) Dir (L) at Timargara.
2. DDEO (M) Dir (L) at Timargara.
3. District Accounts Officer Dir (L) Timargara.
4. Office Record

[Signature]
 Ihsan ul Haqad Master
 G.M.S. Tangi Payeen
 (Khadagzai Distt: Dir(L))

02.09.2019

Husband of the appellant on behalf of appellant present. Muhammad Usman ADO representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 08.10.2019 before S.B at Camp Court, Swat.



Member

Camp Court, Swat.

08.10.2019

Husband of the appellant on behalf of the appellant present. Mian Ameer Qadir, Deputy District Attorney alongwith Mr. Muhammad Usman, ADO for the respondents present. Representative of respondents submitted para-wise comments on behalf of respondents No. 1 to 3 which is placed on record. Case to come up for rejoinder and arguments on 06.11.2019 before D.B at Camp Court Swat.



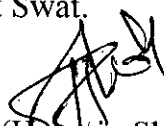
(Muhammad Amin Khan Kundi)

Member

Camp Court Swat

06.11.2019

Husband of the appellant, on behalf of the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Husband of the appellant submitted an application for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Dar-ul-Qaza Swat and cannot attend the Tribunal today. Application is placed on record. Adjourned to 03.12.2019 for rejoinder and arguments before D.B at Camp Court Swat.



(Hussain Shah)

Member

Camp Court Swat



(M. Amin Khan Kundi)

Member

Camp Court Swat

07.05.2019

Husband of the appellant on behalf of appellant present. Written reply not submitted. Muhammad Usman ADEO representative of the respondent department absent. He be summoned with the direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 02.07.2019 before S.B at Camp Court, Swat.



Member
Camp Court, Swat.

02.07.2019

Husband of the appellant on behalf of appellant present. Clerk to counsel for the appellant present. Written reply not submitted. Muhammad Usman ADEO (for respondent No.1) and Toseef Ahmad (for respondent No.2) absent. Respondents as well as absent representatives be put to notice for submission of written reply/comments. Adjourn. To come up for written reply/comments on 02.09.2019 before S.B at Camp Court, Swat.



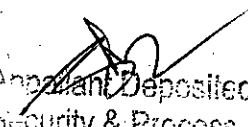
Member
Camp Court, Swat.

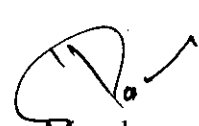
08.02.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant has filed the present service appeal with the prayer that the respondent No.1 be directed to adjust the appellant in any school as per rules and regulations. Learned counsel for the appellant argued inter-alia that the appellant was appointed as PTC vide order dated 24.06.1997 and was adjusted in Government Girls Primary School Landi Shah Warai District Dir Upper; that the appellant was later on transferred to GGPS Umaray Karamay Asbanr District Lower Dir vide order dated 27.08.1998; that thereafter the appellant was adjusted and directed to work at GGPS Gambir Mayar Dir Lower vide order dated 13.12.1999; that the appellant was then verbally informed that her adjustment order is not proper and he should contact the office concerned; that the appellant time and again visited the office and also submitted departmental appeal but to no avail.


Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections including the issue of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply. To come up for written reply/comment son 02.04.2019 before S.B at camp court Swat.


Appellant Deposited
Security & Process Fee


Member
Camp Court Swat.

02.04.2019

Learned counsel for the appellant present. Written reply not submitted. Muhammad Usman ADEO representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 07.05.2019 before S.B at Camp Court Swat.


Member
Camp Court, Swat.

FORM OF ORDER SHEET

Form-A

Court of _____

Case No. _____

1302/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of Judge
1	2	3
1-	15/10/2018	<p>The appeal of Mst. Paveen Akhtar presented today by Mr. Abdul Qayum Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at swat for preliminary hearing to be put up there on <u>7-12-2018</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p> <p>Appellant absent. Learned counsel for the appellant absent. Notice be issued to the appellant for 08.02.2019. Adjourn. To come up preliminary hearing on the date fixed before S.B at camp court Swat.</p>
2-	17/11/2018	<p style="text-align: right;"><i>[Signature]</i> Member Camp Court Swat.</p> <p style="text-align: right;">Swat.</p>
1	07.12.2018	<p>Appellant absent. Learned counsel for the appellant absent. Notice be issued to the appellant for 08.02.2019. Adjourn. To come up preliminary hearing on the date fixed before S.B at camp court Swat.</p>

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Service Appeal No _____ of 2018

Parveen Akhtar (Appellant)

VERSUS

District Education Officer and others..... (Respondents)

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6.	Copy of order dated 13-12-1999	C	12
7.	Copy of departmental appeal	D	13
9.	Power of attorney	—	14
10	Wakalatnama	—	15

Appellant
Through Counsel


ABDUL QAYUM
Advocate, High Court

Office: Zeb Plaza, Watkey
Chowk, Mingora, Swat
. Cell No: 0315-9268431



BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No 1302 of 2018

Diary No. 1531

Dated 15-10-2018

Mst. Parveen Akhtar daughter of Khan Zada resident of
Village & P.O Amir Abad, Chackdara, Tehsil Adenzai,
District Dir Lower.Appellant

VERSUS

1. District Education Officer (Female) Dir Lower at Timergara.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.
3. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar.

.....Respondents

Filed to Registrar
15/10/18

**SERVICE APPEAL UNDER SECTION 4, OF
THE KPK SERVICE TRIBUNAL ACT, 1974.**

PRAYER IN APPEAL

On acceptance of this appeal, the respondent No. 1
may kindly be directed to adjusted the appellant

in any school as per rules & regulation with all back benefits.

Any other relief which is proper in the instant circumstances of the case may also be granted though not specifically asked for.

Respectfully Sheweth,

- 1) That the appellant was appointed by the respondents department as (PTC) P.S.T in Govt. Girls Primary School Landi Shah, Warai, District Dir Upper vide order dated 24-06-1997. (Copies of the appointment order & arrival report are attached as annexure "A")

- 2) That the appellant was latter on transferred by the respondents department from GGPS Landi Shah Wari Dir Upper to GGPS Umaray Karamay, Asbanr District Dir Lower vide endst No. 1741-49 dated 27-08-1998. (Copy of transferred order 27-08-1998 is attached as annexure "B")

- 3) That thereafter the appellant was adjusted & directed to work at GGPS Gambir Mayar Dir Lower vide order No. 1111 dated 13-12-1999. (Copy of order dated 13-12-1999 is attached as annexure "C")
- 4) That thereafter the appellant was informed verbally that the above adjustment order is not proper, and you have to contact the office concerned.
- 5) That the appellant for time and again visited the office and also submitted departmental appeal before the respondent No. 1, but all in vain. (Copy of departmental appeal is attached as annexure "D")
- 6) That extremely aggrieved from the action & inaction of the respondent department by not adjusting the appellant on her post, have no other remedy except to file instant appeal before this Honorable Tribunal on the following grounds amongst others.

GROUNDS:-

- a. That the act of respondent department is illegal, against the rules & regulation and exercised their power not vested to them.

- b. That the appellant approached to the concerned department for his adjustment / reinstatement but the department on one pretext or other cannot respond positively.

- c. That till date neither any show cause notice nor any inquiry whatsoever has been conducted by the respondent department, which was necessary under the rules, but Respondents fails to issue show cause notice nor any inquiry was conducted, and not adjusting the appellant on any post on pretext or other.

- d. That it well be pertinent to bring in to the kind notice of this honorable tribunal that no adverse order / show cause notice / termination order exists


in the field against the appellant, but despite of fact the department hesitating to adjust the appellant on her post.

- e. That the appellant was not treated legally & constitutionally, and condemned unheard and is clear violation of Article 10-A & 25 of the constitution, so on this score too the appellant is liable to be adjusted on her post with all back benefits.
- f. That the Respondents now want to deprive the petitioner of her right of adjustment, hence needs interference of this honorable tribunal.
- g. That the appellant was not adjusted, and keep away from the service without fulfilling the codal formalities, hence not warranted under the law.
- h. That further grounds, with leave of this Honorable tribunal, would be raised at the time of arguments.

Therefore in view of the above submissions, it is most humbly prayed that On acceptance of this appeal, the respondent No. 1 may kindly be directed to adjusted the appellant in any school as per rules & regulation with all back benefits.

Any other relief which is proper in the instant circumstances of the case may also be granted though not specifically asked for.

DARVEEN AKHTAR
Appellant
Through Counsel


ABDUL QAYUM
Advocate, High Court
Dated: 12-10-2018

CERTIFICATE:

(As per directions of my client) No such like Appeal earlier has been filed by the appellants on the subject matter before this Honorable Tribunal.


ADVOCATE

7

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Parveen Akhtar (Appellant)

VERSUS

District Education Officer and others..... (Respondents)

ADDRESSES OF THE PARTIES


APPELLANT

Mst. Parveen Akhtar daughter of Khan Zada resident of
Village & P.O Amir Abad, Chackdara, Tehsil Adenzai,
District Dir Lower through attorney Muhammad Ghaffar
NIC No:153074-961987-3 Cell No:0346-5451232

RESPONDENTS

1. District Education Officer (Female) Dir Lower at
Timergara.
2. Director Elementary & Secondary Education Khyber
Pakhtunkhwa at Peshawar.
3. Secretary Elementary & Secondary Education Khyber
Pakhtunkhwa at Peshawar.

Appellant
Through Counsel


ABDUL QAYUM
Advocate, High Court

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Service Appeal No _____ of 2018



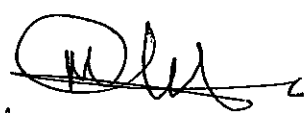
Parveen Akhtar (Appellant)

VERSUS


District Education Officer and others..... (Respondents)

AFFIDAVIT

I, Muhammad Ghaffar (attorney for appellant), do hereby solemnly affirm and declare on oath that the contents of the above titled Appeal is true and correct to the best of my knowledge and belief.




DEPONENT

Identified by


Abdul Qayum
Advocate, High Court

- F-78-Dir-6
- | | | |
|-------------------------------------------------------------|--------|----------------------------------------------------------------|
| 51. Amnu D/O Feroz Khan
R/O Chakdara 14/4/77 | 89/19 | GDS Mora Shah V; Musarat Begum term; as not selected on merit. |
| 52. Dukhtar D/O Ghulam Qadar R/O Kityari 1/1/75 | 97/20 | " Kadero Shah V; Roqia Jabin -do- |
| 53. Shafia D/O Ghulam Qadar R/O Kityari 15/4/75 | 98/21 | " Khadagzi (F) V; Nasrat Begum -do- |
| 54. Asmat BiBi D/O Nasrullah Khan R/O Chakdara 1/02/76 | 99/22 | " Wajabay V; Mehru-Nisa -do- |
| 55. Seema Jamal D/O Mohd Waris R/O Chakdara 2/2/76 | 100/23 | " Barghwali V; Yasmin Begum -do- |
| 56. Bakht, Bisior D/O Fazal Ghani R/O Mayer Khadagzi 4/8/76 | 101/24 | " Markhandi V; Musarat -do- |
| 57. Ishrat D/O Ali Rehman R/O Chakdara 20/4/79 | 102/25 | " Shaigah V; Mohsan -do- |
| 58. BiBi Amina D/O Shamsul Islam R/O Osakai 3/4/77 | 103/26 | " Markhandi V; Musarat -do- |
| 59. Fozia BiBi D/O Ghulam Mohd Osakai 15/4/77 | 104/27 | " Gurrei V; Gul Rana -do- |
| 60. Raham Wala D/O Amir Rahman R/O Khadagzi 15/2/78 | 105/28 | " Galkor V; Nagina Begum -do- |
| 61. Kawsar Niaz D/O Gul Zaman R/O Manogay 1/4/79 | 106/29 | " Mano Shafiq V; Seraj Begum -do- |
| 62. Sheheen Begum D/O Rahmat Wali R/O Katkela 12/4/78 | 107/30 | " Galkor V; Narsim Behar -do- |
| 63. Dilraz Begum D/O Fazal Alim R/O Ramra 19/6/78 | 108/31 | " Bagh K; Khalil V; Bushra Begum -do- |
| 64. Falak Naz D/O Badshah Wahid Ouch 02/02/68 | 109/32 | " Umerali V; Roheeda -do- |
| 65. Asmat Begum D/O Mohd Salim R/O Ouch 02/11/76 | 110/33 | " Balkor V; Nahed Begum -do- |
| 66. Ihsana BiBi D/O Mohd Sherin R/O Badwan 20/4/79 | 112/34 | " Sankor No. 1 V; Zira Jabin -do- |
| 67. Fakraj D/O Faiz Mohd R/O Chat pat 10/3/76 | 113/35 | " Luqman Banda V; Asmat Begum -do- |
| 68. Rehena Yasmin D/O Mohd Usman R/O Chakdara 01/03/77 | 114/36 | " Landai Shah V; Rabia Sultah -do- |
| 69. Shahamat D/O Sherin Zada R/O Chakdara 01/02/74 | 115/37 | " Shekawli V; Khudija -do- |
| 70. Anwar Sultan D/O Mohd Zarin R/O Ouch 01/06/79 | 115/38 | " Kass Banda V; Bacha Begum -do- |
| 71. Parveen Akhtar Khan Zada R/O Amir Abad 01/07/71 | 117/39 | " Landai Shah V; Rabia Sultah -do- |
| 72. Tawheed Anjum D/O Fazal Rahman R/O Shamli 15/08/77 | 118/40 | " Barghwali V; Bakht Begum -do- |
| 73. Haniet D/O Jehandar Khan R/O Badwan 04/02/76 | 119/41 | " Guma Dand V; Fozia BiBi -do- |
| 74. Almas Begum D/O Feroz Khan R/O Chakdara 09/05/77 | 120/42 | " Mohd Arif Kali V; Farida Begum -do- |
| 75. Najia Begum D/O Kachkool R/O Khadagzi 10/01/78 | 121/43 | " Keir Dara V; BiBi Zakia -do- |
| 76. Haleema BiBi D/O Abdullah R/O Tkinai 02/02/76 | 122/44 | " Guma Dand V; Nojam Ara -do- |
| 77. Kalsoom Akhtar D/O Dilaram Khan R/O Alinast 16/03/75 | 123/45 | " Gryal V; Kawsar -do- |
| 78. Shahzia BiBi D/O Mukhtarun-Nabi R/O Badwan 25/4/78 | 124/46 | " Fazal Abed (F) already occupied by 1 |
| 79. Asmat Shagufta BiBi D/O R/O Ouch 2/4/77 | 125/47 | " Gryal V; Naheda Term; as not selected on merit. |
| 80. Fahmeeda Begum D/O Mohd Irfan R/O Ouch 1/8/71 | 126/48 | " Zako V; Najbeen Hayat -do- |

TERMS & CONDITIONS: =

1. They will be governed by such rules and regulation and may be prescribed by the Govt; from time to time for the category of the Govt; servant to which they belong. 2. Their service will lieable to termination on one month notice from either side. In case of resignation with out notice one month pay will be forfeited in lieu thereof. They should joined the posts with in one month of the issue of this notification/Officer order.
3. The enter sniority will be determined in accordance w th the Departmental selection Committee.

Cont: P-6

واری
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صلا

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1358

Handwritten signature/initials

10

CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that we have on the fore/^{noon}afternoon of this day respectively made over and received charge of this office of the P.T.C Post vide Order Ends No 3978-4208 Dated Temargara the 24.6.1997 or 25.6.1997 (E.W)

2. Particulars of cash and important secret and confidential documents handed over are noted on the revers:—

Signature of relieved Government servant vacant
Designation پست وکٹری

Station Lardai Shah

Signature of relieving Government servant پروین اختر بگم خود
PARVEEN AKHTER
Designation P.T.C

Dated 25.6.1997

Forwarded to the S.D.E (E) Pramesy Dir at temargara.

N.W.F.P Acct: 22 D.E (E) Pramesy Dir at temargara.

شرف 60

CTC
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Annex - B

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (FEMALE) DIR AT TIMARGARA.

The following P.T.C teachers are hereby sanctioned transferred to the schools against their names in the interest of public service.

Sr. No.	Name & Designation	From	To	Remarks.
1	Mirza Begum	GGPS: Bambolai (B)	GGPS: Awi Shah	against Vice S: No.
2	Hareat Begum	GGPS: Awi Shah	GGPS: Bambolai (B)	Vice S: No. 1.
3	Fariha Khatun	GGPS: Landai Shah	GGPS: Umaramay Karamay	Vice S: No. 4.
4	Ulfat Begum	GGPS: Umaramay Karamay	GGPS: Landai Shah	Vice S: No. 3.
5	Sabi Khatun	GGPS: Awaro Shah	GGPS: Tazagram	Vice S: No. 6.
6	Rehana Yamin	GGPS: Tazagram	GGPS: Awaro Shah	Vice S: No. 5.

(Mrs: Mehboob Sultana)

Sub-Divisional Education Officer (Female) Dir at Timargara.

Order No. 17416-49 / Dated 27/8/98.

Copy forwarded for information & necessary action to the:-

1. District Officer (Female) P.T.C. Dir at Timargara.
2. 7 mistresses concerned.
3. Accountant local office.
4. Officer record.

[Signature]
 Sub-Divisional Education Officer (Female) Dir at Timargara.

CTC
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12

OFFICE OF THE
DISTRICT EDUCATION OFFICER
PRIMARY DIR(L) AT TIMERGARA
No. 1111 / Dated 13/12/99

To,

Mrs; Parveen Akhtar ex-PTO
GGPS Umeray Naramay.

Annex C

Subject; - ADJUSTMENT/GRANT OF LEAVE/SCHOOL DUTY.

Memo; -

reference your application, received through SDEO(F)
Dir at Timergara vide her office No, 3519 dated 8/12/99.

You are directed to work at GGPS Gambir Mayar till
the decision of your case.

[Signature]
DISTRICT EDUCATION OFFICER(F)
PRY: DIR(L) AT TIMERGARA.

Encl; no, 1112

Copy of the above is forwarded to the SDEO(F) Dir at
Timergara with the remarks to prepare ~~medical~~ leave case w.e.f 27/8,
98 to 30/11/99, and submit the same to this office for further
necessary action, as the case already submitted by your office vide
no, 3456 dated 18/11/99 is not authentic, and *Return herewith*

Encl: *S/Note*

[Signature]
DISTRICT EDUCATION OFFICER(F)
PRIMARY DIR(L) AT TIMERGARA.

Cte
[Signature]

DEO قس میل محکمہ تعلیم ڈیپارٹمنٹ اینڈ اینڈ ٹیکنالوجی ڈیپارٹمنٹ
 عنوان ا درخواست پیرائے اینڈ سفٹ۔ بحثیت PTC ٹیکسٹ

Annex D
 صا۔ عالیہ

عوزبانہ نرائس ہے کہ مطابق آرڈر نمبر 4208-39

مخبرہ 6/97 کو سائلہ کی تقرری بحثیت PTC ٹیکسٹ سے GPS
 لنڈہ شاہ (واڑی) میں بیوی تھی۔ بعد ازاں سائلہ کی تبدیلی
 کسے (اسنٹر) میں بیوی۔ لیکن نامعلوم وجوہات کی بنا پر
 تبدیلی بعد ازاں نکال سے GPS ٹیکسٹ (معیار) بیوی دیان

فصد ماہ بدعات سرانجام دینے کے بعد دفتر فلڈا سے یہ اینڈ سفٹ
 ختم کیا گیا۔ جسے وہ سے بخواتین بھی ادا نہیں کی گئی
 اور سائلہ کو پریستانی میں ختم کسی جواز کا مستلزام کیا گیا۔
 سائلہ کو بتایا گیا کہ ٹیکسٹ پر انکی سکول سے اینڈ سفٹ
 صحیح نہیں تھی۔ بار بار نوٹیشنوں کے باوجود ابتدائے سائلہ عوزوں

اور مین پر القاف کے اینڈ سفٹ سے فارغ ہے۔ استدعا
 ہے کہ سائلہ کی اینڈ سفٹ کرائم معدون و مشکو افغانی
 حسین نواز سی بیوی

الگارہ

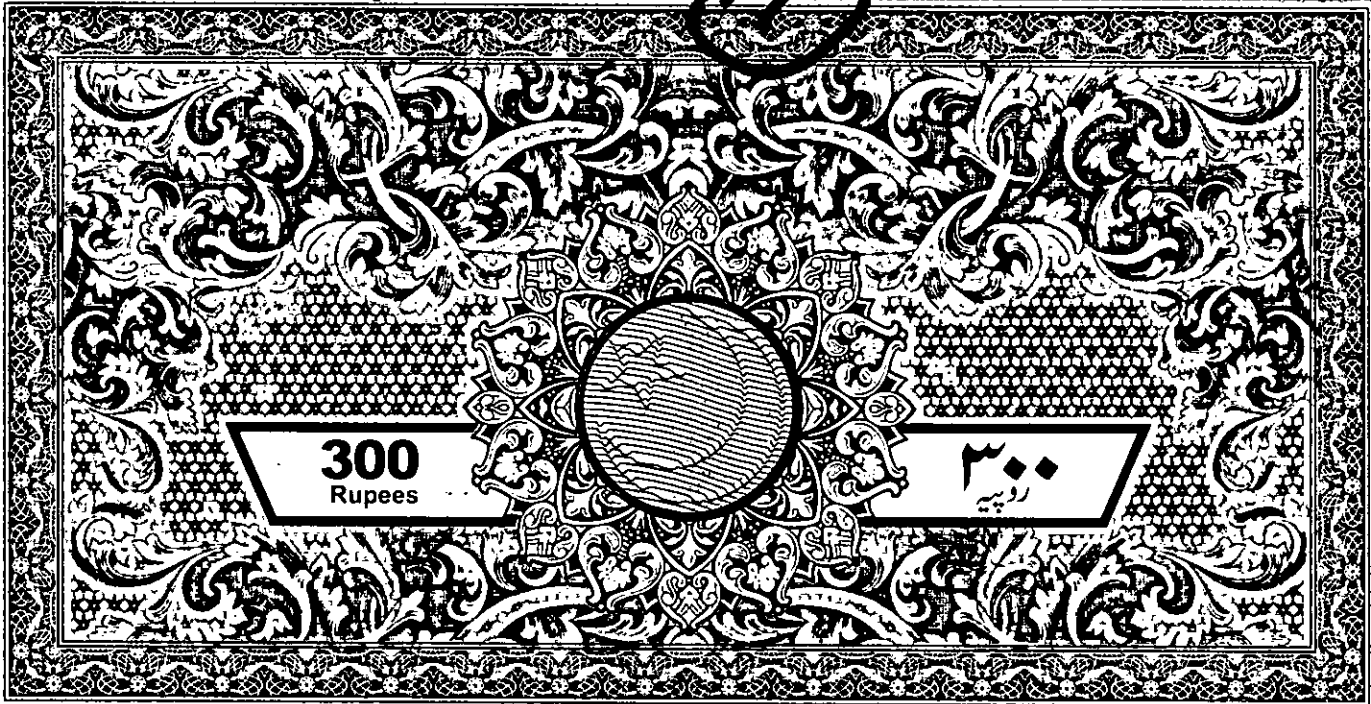
ڈپوٹن اہتم % خان زاوہ

گادی و ڈائی نہ حکمرانہ اہم آباد علم ڈیپارٹمنٹ

۱۴ جمادی الثانی : 2018/07/07



14



ATTESTED
Atfakhar Ahmad Advocate
Notary Public
No. 221
Date 12/11/08
Tehsil Courts Chakdara Dir (L)

بسم اللہ الرحمن الرحیم جسٹس کے سامنے پیش کیا گیا ہے

پروین اختر نام حکومت پاکستان
محمد نواز خاص

مخاطبہ پروین اختر زوجہ محمد غفار دفتر خاندان مسکنہ احمد آباد چکداران

مجلس اور غازی خان تحصیل میرپور

بھی محمد غفار ولد عبد الوارث مسکنہ احمد آباد چکداران تحصیل اور غازی خان

برائے تحریر عدا اقرار کر کے لکھ دیتا ہوں روہیت ہیں۔ کہ جس مقرر مایاں مقران بجز محمد غفار اور محمد نواز کے۔ یہودی مقدمہ سے معذور ہوں رہیں۔ ایسے اپنی جانب سے کسی محمد غفار سے۔۔۔ ولد۔۔۔ عبد الوارث۔۔۔ نہ کہ محمد نواز کے۔۔۔ قسین رستمی۔۔۔ صلح سے یہ لکھ کر۔۔۔ کہ بھارت خاص مقرر کر کے اختیار دیتا ہوں روہیت ہیں۔ کہ دعویٰ مذکورہ بالا میں بھارتی مذکور میری رہماری جانب سے کسی وکیل کو مقرر کریں۔ بیان تحریری پر تصدیق منجانب میرے رہمارے کریں اور اس کو داخل کریں۔ کاغذات یا دیگر ثبوت تحریری زبان ملی طلب کر میں یا پیش کریں یا واپس لیں یا سوال و جواب کریں یا خود بطور گواہ بیان قلمبند کرے یا شہادت پیش کرے۔ صلح نامہ، راضی نامہ، دست برداری یا بازا دعویٰ دیں یا اقرار نامہ ثالثی داخل یا قبول کریں یا مقدمہ کا فیصلہ برائے شریعت یا حلف بالقرآن کرے یا کروائے۔ بیان لکھنا میں یا دیگر درخواست کسی مضمون کی پیش کریں یا کوئی مطالبہ متعلقہ مقدمہ داخل کریں یا واپس لیں اور بعد فیصلہ مقدمہ ڈگری کو جاری کر ادیں اور درخواست اجراء کی تصدیق کریں اور رقم متعلقہ اجراء وصول کریں اور اس کے سلسلہ میں جو کچھ کارروائی ہو عمل میں لائیں۔ یا بدوران مقدمہ کسی حکم عدالت کے خلاف اپیل رگرانی کرے۔ یا بصورت اخراج دعویٰ اپیل رگرانی کریں۔ غرضیکہ مقدمہ کی یہودی کے سلسلہ میں ہر قسم کی کارروائی عمل میں لائے۔ جملہ ساختہ و پرداختہ کارروائیوں کو موافق کا مثل کردہ ذات خاص اپنے کے قبول منظور ہے۔ لہذا یہ عدا نامہ خاص لکھ دیا کہ سندر ہے۔ فقط

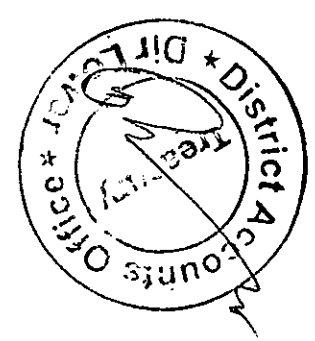
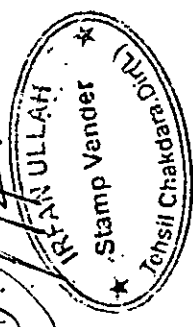
محمد غفار (Signature)
محمد نواز (Signature)
153074.961987.3 / 15307.0872635.1
15302.0842517.0

محمد نواز محمد غفار مسکنہ احمد آباد چکداران تحصیل اور غازی خان
مسکنہ احمد آباد چکداران تحصیل اور غازی خان
15307.5274360.9

مستند رقم 102408 تاريخ 12/10/18

مستند رقم 102408 تاريخ 12/10/18

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بعدالت سرس سرسین کے لئے قیام حارر

کوٹ فیس	قیمت ایک روپیہ
---------	----------------

مورخہ

مقدمہ

دعویٰ 2074

Service Appeal

جرم

۲۰ منجانب اسرار کے

سرور من اختر بنام DEO تحصیل دیر لودر

باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی وجواب دہی و کل کاروائی متعلقہ آن مقام ST ضلع کھنوں خرون کے رکھنے اسرار کے لئے مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل احتیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

Passive MA 10/10/08

۲۰ 2074

ماہ اکتوبر

المرقوم 12

العبد گواہ شہداء العبد
 بمقام سند
 A. G. G. Adm.
 03159268437

A

(3)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1372/2013

Date of institution ... 26.9.2013
Date of judgment ... 02.08.2016



Nisar Ahmad s/o Noor Muhammad,
R/O Village & P.O. Proper Dir,
Tehsil and District Dir Upper.

... (Appellant)

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary, Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
2. Director, Elementary & Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Primary), Dir Upper.

... (Respondents)

APPEAL UNDER SECTION-4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, TO THE EFFECT THAT THE SALARIES OF THE APPELLANT BE RELEASED FROM 31.8.1993 TO-DATE AND HE BE ADJUSTED ON HIS POST.

Mr. Main Tajjamul Shah, Advocate.
Mr. Muhammad Jan, Government Pleader

ATTESTED

... For appellant.
... For respondents.

MR. PIR BAKHSH SHAH
MR. ABDUL LATIF

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

JUDGMENT

PIR BAKHSH SHAH, MEMBER: It was submitted that appellant was appointed as Chowkidar in the year 1988, in the Education Department and posted at GGPS, Rehan Kot, he received salary up-to June 1993. It was further submitted by learned counsel for the appellant that he was falsely implicated in a criminal case, in which he remained behind the bar only for 18 days where-after on his release ^{from jail} he submitted application for adjustment/resumption of duty but the department neither adjusted him nor passed any adverse order against him. In this regard inquiry report dated 16.3.2009 was referred to copy of which is available on file. It was also urged that no show cause notice, no termination order or any adverse order was passed against the appellant as concluded in the said inquiry report according to which the appellant

4

was recommended to be reinstated into service in accordance with rules and regulation. The learned counsel for the appellant stated that the appellant thereafter also went ⁱⁿ writ petition and the Hon'ble Peshawar High Court Peshawar vide its order dated 17.4.2013 directed the appellant to approach the proper forum hence, this service appeal under section-4 of the Khyber Pakhtunkhwa Service Tribunal act, 1974 before this Tribunal.

2. Arguments heard and record perused.

3. The appeal was resisted by learned Government Pleader on the ground that the appellant remained absent for sufficient long time and despite the fact that no formal termination order or any disciplinary proceedings were taken but appellant is not entitled for any relief from this Tribunal for such long absence.

4. In the light of the foregoing facts of the case, as no formal order of termination has been passed by the competent authority nor departmental appeal of the appellant has yet been decided therefore, the matter is remitted to the respondents to examine the case in the light of rules and to decide the matter on its merits through a speaking order. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record.

Announced
02-08-2016 SD/- Mir Bakht Shah,
Member

SD/- Abdul Latif,
Member

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

Number of Writs	13-10-17
Copying Fee	800
Urgent	6-
Total	2-
Name of Clerk	8-
Date of Call	13-10-17
Date of Delivery	13-10-17

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO.1302/2018.

Mst: Praveen Akhtar daughter of Khan Zada resident of Village & P.O Amir Abad Chakdara Tehsil Adenzai District Dir Lower.

.....Appellant

VERSUS

1. District Education Officer female Dir. lower at Timergara
2. Director (Elementary & Secondary Education), Khyber Pakhtunkhwa at its Directorate Dabgari Gardens, Peshawar.
3. Secretary Education Govt: Khyber Pakhtunkhwa Civil Secretariat, Peshawar.

.....Respondents

PARA WISE COMMENTS/REPLY FOR AND ON BEHALF OF THE RESPONDENTS NO 1 to 3

Respectfully Sheweth:-

Preliminary Objections:-

1. The appellant has got no locus standi or cause of action to file the instant appeal.
2. The instant appeal is badly time barred.
3. The instant service appeal is based on malafied intention for gaining illegal and unauthorized service benefits from the respondents.
4. The appellant has concealed the material fact from this Hon! Able Tribunal, hence liable to be dismissed.
5. The appellant has not approached this Honorable Tribunal with clean hands.
6. The present appeal is liable to be dismissed for mis-joinder of unnecessary and non-joinder of necessary parties.
7. The appellant has filed the instant appeal on malafide motives.
8. The instant appeal is against the prevailing laws & rules.

ON FACTS.


Respectfully Sheweth.


1. This Para relates to the appellant residential and service record hence needs no comments.
2. This para also pertains to the record hence needs no comments.
3. Correct up to the extent of her adjustment at GGPS Gambir Lower Dir, but she left the school without any information on 22-12-1999. She did not attend the school after winter vacation and hence she remained absent since 23-12-1999. Due to her long absence, her services ceased automatically as per FR-18.
4. Incorrect, neither she joined the duty, nor she informed the respondent department.
5. Incorrect Para No.4 may be considered as reply to this Para.
6. Incorrect she did not approach the respondent department in time, after the lapse of nineteen years she applied for adjustment through court, but as per law, there is no provision to adjust someone after nineteen years absence. Her total length of service is 02 year, 05 months and 26 days. While absence period 19 years hence denied.

ON GROUNDS:-

- (A) Incorrect the respondent always follows rules, regulations and policies consigned by the government.
- (B) Incorrect: The appellant has never approached the respondent department in this regard, hence denied.
- (C) Incorrect all coded formalities had been observed in this regard.
- (D) Incorrect due to long absence, her services ceased automatically.
- (E) Incorrect the respondent department always follows rules, regulation and policies consigned by the government and there is no provision to reinstate someone after nineteen years absence hence denied.
- F) Incorrect the respondent department always follows rules, regulation and policies consigned by the government.
- G) Incorrect the respondent department always follows rules regulations and policies consigned by the government and all coded formalities has been done in this regard.
- H) Legal, however, the respondents also seeks permission to submit additional grounds, case law and additional documents at the time of the arguments on the date fixed please.

In view of the above made submission, it is humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favor of the respondents Department.


DISTRICT EDUCATION OFFICER (F)
DIR LOWER AT TIMERGARA
(Respondent No.3)


Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.
(Respondent No.2)

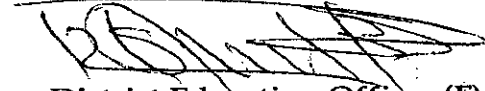

Secretary
Elementary and Secondary Education Department

Khyber Pakhtunkhwa Peshawar
GOVT. of
Khyber Pakhtunkhwa
E&SE Department

AUTHORITY LETTER.

Mr. Mohammad Usman ADEO (Female) Dir Lower is hereby authorized to submit the comments / reply in the Service Appeal No.1302/2019.

Title: Parveen Akhtar v/s Govt etc Dir Lower On behalf of the undersigned.



District Education Officer (F)

Dir Lower.

Respondent No.3

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(D) Incorrect due to long absence, her services ceased automatically.

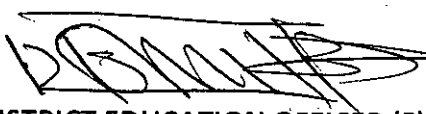
(E) Incorrect the respondent department always follows rules, regulation and policies consigned by the government and there is no provision to reinstate someone after nineteen years absence hence denied.

F) Incorrect the respondent department always follows rules, regulation and policies consigned by the government.

G) Incorrect the respondent department always follows rules regulations and policies consigned by the government and all coded formalities has been done in this regard.

H) Legal, however, the respondents also seeks permission to submit additional grounds, case law and additional documents at the time of the arguments on the date fixed please.

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DISTRICT EDUCATION OFFICER (F)
DIR LOWER AT TIMERGARA
(Respondent No.3)

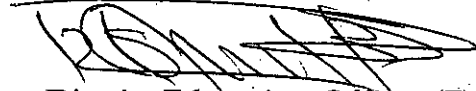
*Annex the relevant Record.
Velled*

2.9.19

AUTHORITY LETTER.

Mr. Mohammad Usman ADEO (Female) Dir Lower is hereby authorized to submit the comments /reply in the Service Appeal No.1302/2019.

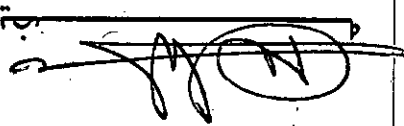
Title: Parveen Akhtar v/s Govt etc Dir Lower On behalf of the undersigned.



District Education Officer (F)
Dir Lower.
Respondent No.3

بذریعہ پتہ ذیل

سابقہ ڈپٹی ایگزیکٹو



06/11/2019: المذکورہ - سابقہ ڈپٹی ایگزیکٹو

بذریعہ پتہ ذیل

پتہ ذیل سے ہے۔

پتہ ذیل سے ہے۔ بذریعہ پتہ ذیل

پتہ ذیل سے ہے۔ بذریعہ پتہ ذیل

06/11/2019

پتہ ذیل سے ہے۔ بذریعہ پتہ ذیل

بذریعہ پتہ ذیل

بذریعہ پتہ ذیل

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