

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT, ABBOTTABAD

Service Appeal No. 1403/2018

Date of Institution ... 19.11.2018
Date of Decision ... 16.03.2021

Mehvish Munsif Subject Specialist (Statistics) (BPS-17) GGHS
Keri Raiki, Abbottabad.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Elementary & Secondary Education Peshawar and three others.

... (Respondents)

Kalim Ullah,
Advocate

... For appellant.

Riaz Khan Paindakheil,
Assistant Advocate General

... For respondents.

ROZINA REHMAN
ATIQU UR REHMAN WAZIR

... MEMBER (J)
... MEMBER (E)

JUDGMENT

ROZINA REHMAN, MEMBER : The relevant facts leading to filing of the instant appeal are that appellant was appointed as Subject Specialist (Statistics) on contract basis. Her contract service was regularized and all those similar Subject Specialists whose services were regularized were paid salary w.e.f 24.09.2009 to 31.05.2010 but

Rai?
16/3/21

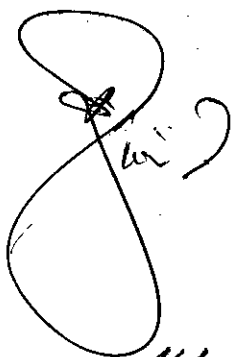
appellant was not paid salary. She, therefore, preferred departmental appeal which was not responded to, hence the present service appeal.

2. We have heard Mr. Kalim Ullah Advocate for appellant and Mr. Riaz Khan Paindakheil learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

3. Mr. Kalim Ullah Advocate learned counsel appearing on behalf of the appellant, inter-alia, argued that conduct of the respondents towards appellant is discriminatory, against law and policy. He argued that stoppage of salary for the period the appellant served the department is against fundamental rights as enshrined in the Constitution.

4. Conversely, learned A.A.G submitted that appellant was treated as per law, rules and policy. He contended that she was paid salary after her appointment and that she failed to show that she was not paid for a specific period.

5. As per record, appellant was appointed as Subject Specialist (Statistics) on contract basis on 26.12.2008, later on, her services were regularized vide notification dated 31.05.2010 w.e.f 24.09.2009. Her claim is in respect of her salary from 24.09.2009 to 31.05.2010. As per record, all those Subject Specialists, whose services were regularized vide notification dated 31.05.2010 alongwith the appellant have been paid salary for the said period but the appellant was not

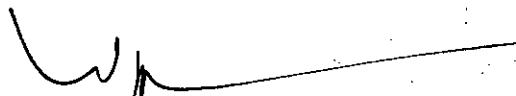


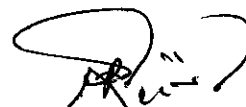
16/3/21

paid due to the reasons best known to the respondents. Neither any break in her service, nor absence from duty was shown. Nothing was brought in black and white in order to show that appellant did not serve Department from 24.09.2009 to 31.05.2010.

5. For the foregoing reasons, this appeal is accepted as prayed for. No order as to costs. File be consigned to the record room.

ANNOUNCED.
16.03.2021


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Abbottabad


(Rozina Rehman)
Member (J)
Camp Court, Abbottabad

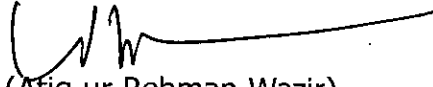
S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	16.03.2021	<p><u>Present.</u></p> <p>Kalim Ullah, ... For appellant Advocate</p> <p>Riaz Khan Paindakheil, ... For respondents Assistant Advocate General</p> <p>Vide detailed judgment of today placed on file, the instant appeal is accepted as prayed for. Parties are left to bear their own costs. File be consigned to the record room.</p> <p><u>ANNOUNCED.</u> 16.03.2021</p> <p>(Atiq ur Rehman Wazir) Member (E) Camp Court, Abbottabad</p> <p>(Rozina Rehman) Member (J) Camp Court, Abbottabad</p>


20.10.2020

Representative of appellant on behalf of appellant present.


Riaz Khan Paindakheil learned Assistant Advocate General alongwith Shuja Ali ADEO for respondents present.

Due to general strike of the bar, case case is adjourned to 15.12.2020 for arguments, before D.B at Camp Court, Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

*Due to covid-19 case is
adjourned to 16-03-2021*


Ch.
Reahn

20.11.2019

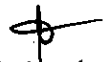
Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney alongwith M/S Shuja Ali ADEO, Adeel Khan Senior Auditor and Ahmad Sultan ADEO present. Written reply on behalf of remaining respondents i.e. respondents No.5 & 6 submitted. To come up for rejoinder if any and arguments on 20.01.2020 before D.B at Camp Court, Abbottabad.



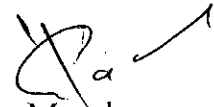
Member
Camp Court, A/Abad

20.01.2020

None for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 18.02.2020 before D.B at camp court Abbottabad. Appellant be put on notice for the date fixed.



Member



Member
Camp Court A/Abad

18.2.20

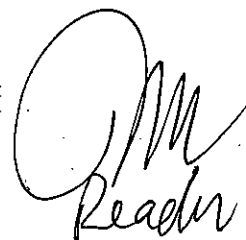
Due to covid ,19 case to come up for the same on 14/ 4 /20 at camp court abbottabad.



Reader

14.4.20

Due to summer vacation case to come up for the same on 10 / 20 at camp court abbottabad.



Reader


16.09.2019

Counsel for the appellant and Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Shujja Ali, ADO on behalf of the respondents No. 1 to 4 present. Para-wise comments on behalf No. 1 to 4 submitted which is placed on record.

Today learned counsel for the appellant submitted application for impleadment of District Education Officer (Female), Haripur and District Account Officer, Haripur as respondents in the panel of respondents on the ground mentioned in the application.

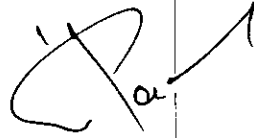
Learned Deputy District Attorney expressed no objection on impleadment of aforesaid officials.

Application is accepted. Muharrar is directed to implead the aforesaid respondents in the panel of respondents. Notice be issued to aforesaid impleaded respondents for written reply/comments and attendance. Case to come up for written reply/comments as well as attendance of the aforesaid respondents on 24.10.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad


24.10.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Shujaa Ali, ADO for respondents No. 1 to 3, Mr. Muhammad Adeel, AAO for respondent No. 6 present and requested for adjournment. Adjourn. Fresh notices be issued to respondents No. 4 & 5. To come up for written reply/comments on 20.11.2019 before S.B at camp court, Abbottabad.


Member
Camp court, A/Abad


20.05.2019

Counsel for the appellant and Mr. Shujja Ali, ADO for respondent No. 2 alongwith Mr. Muhammad Bilal, Deputy District Attorney present. None present on behalf of respondents No. 1, 3 & 4 therefore, notice be issued to respondents No. 1,3 & 4 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned to 08.07.2019 for written reply/comments before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

08.07.2019

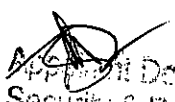
Counsel for the appellant and Mr. Shujja Ali, AD (Litigation) alongwith Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further adjournment. Adjourned to 16.09.2019 for written reply/comments before S.B at Camp Court Abbottabad.

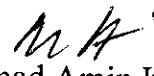

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

22.02.2019

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Subject Specialist on contract basis vide order dated 26.12.2008. It was further contended that after the Employees Regularization of Services Act, 2009, the appellant was regularized vide order dated 31.05.2010. It was further contended that the respondent-department paid salary to the other similar employees with effect from 24.09.2009 to 31.05.2010 vide order dated 24.01.2011 but neither the name of the appellant was mentioned in the said list dated 24.01.2011 nor paid salary to the appellant therefore, the appellant was discriminated. It was further contended that the appellant filed departmental appeal on 27.07.2018 but the same was not responded hence, the present service appeal on 19.11.2018. It was further contended that there is some delay in filing of departmental appeal but the present service appeal pertain to money matter therefore, in such like cases limitation does not run. It was further contended that since other similar employees has been paid salaries for the aforesaid period therefore the appellant was discriminated 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 20.05.2019 before S.B at Camp Court Abbottabad.




Appellant Deposited
Security & Process Fee


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1403/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/11/2018	<p>The appeal of Mst. Mehvish Munsif received today by post through Mr. Kaleem Ullah 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;"> REGISTRAR 19/11/18</p>
2-	22-11-2018	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22-02-2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No. 1403 /2018

Mehvish Munsif Subject Specialist (Statistic) (BPS-17) GGHS Keri Raiki,
Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL


INDEX

S.#	Description	Page No.	Annexure
1.	Service Appeal alongwith affidavit	1 to 7	
2.	Copy of appointment letter	8-13	"A"
3.	Copy of regularization notification No.SO(G)E&S/1-85/2009/SS/ Contract dated 31/05/2010	14-23	"B"
4.	Copy of Notification dated 24/01/2011	24-27	"C"
5.	Copy of salary slip of similar S.S	28	"D"
6.	Copy of departmental appeal	29-30	"E"
7.	Wakalatnama	31	


...APPELLANT

Through

Dated: 10 / 11 /2018


(KALIMULLAH)
Advocate High Court, Abbottabad

8-1-8
25-1-8

5-1-8
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28-1-8
28-1-8

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

Service Appeal No. 1403 /2018

Mehvish Munsif Subject Specialist (Statistic) (BPS-17) GGHS Keri Raiki,
Abbottabad.

.....APPELLANT

VERSUS

- ✓ 1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar.
- ✓ 2. District Education Officer (Female), Abbottabad.
- ✓ 3. Director Elementary & Secondary Education, KPK, Peshawar.
- ✓ 4. District Accounts Officer, Abbottabad.
- ✓ 5. District Education Officer (Female), Haripur.
- ✓ 6. District Account Officer, Haripur.
7. ~~District Education Officer (Female), Haripur.~~
8. ~~District Accounts Officer, Haripur.~~

.....RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT
APPELLANT IS SERVING IN GGHS AS SUBJECT
SPECIALIST (STATISTICS) IN THE
RESPONDENT'S DEPARTMENT SINCE 26/12/2008
BUT SHE HAS NOT BEEN PAID SALARY W.E.F**

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

Service Appeal No. 1403 /2018

Mehvish Munsif Subject Specialist (Statistic) (BPS-17) GGHS Keri Raiki,
Abbottabad.

....APPELLANT

Khyber Pakhtukhwa
Service Tribunal

Diary No. 1655

Dated 19-11-2018

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar.
2. District Education Officer (Female), Abbottabad.
3. Director Elementary & Secondary Education, KPK, Peshawar.
4. District Accounts Officer, Abbottabad.

....RESPONDENTS

Filed to-day

Registrar

19/11/18

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT
APPELLANT IS SERVING IN GGHS AS SUBJECT
SPECIALIST (STATISTICS) IN THE
RESPONDENT'S DEPARTMENT SINCE 26/12/2008
BUT SHE HAS NOT BEEN PAID SALARY W.E.F

24/09/2009 TO 31/05/2010 FOR THE SERVICES RENDERED BY HER WHICH IS AGAINST THE LAW, DISCRIMINATORY, PERVERSE, RULES AND REGULATIONS.

Respectfully Sheweth: -

1. That the appellant got appointment as S.S (Statistic) on contract basis on 26/12/2008. Copy of appointment letter is annexed as Annexure "A".
2. That the Govt. of KPK announced KPK Employees (Regularization of Service Act, 2009) for regularization of contract employees. The contract service of the appellant has been regularized at serial No.183 of regularization notification No.SO(G)E&S/1-85/2009/SS/Contract dated 31/05/2010. Copy of regularization notification No.SO(G)E&S/1-85/2009/SS/Contract dated 31/05/2010 is attached as Annexure "B".

3. That once service of the appellant has been regularized as per the KPK (Regularization of Service Act, 2009). Hence, the appellant is entitled to receive salary of the period w.e.f 24/09/2009 to 31/05/2010. As per notification No. SOG(E&SE)1-85/2011/SS Regular dated 24/01/2011 wherein the authorities were directed to adjust salary of the appellant w.e.f 24/09/2009 to 31/05/2010. Copy of Notification dated 24/01/2011 is attached as Annexure "C"
4. That the department has paid salary to the appellant w.e.f 31/05/2010 instead of 24/09/2009 onward which is against the law.
5. That it is worth to mention here that all those similar (subject specialist) (BPS-17) whose services were regularized vide notification No.SO(G)E&S/1-85/2009/SS contract dated 31/05/2010 alongwith the appellant have been paid salary/emolument w.e.f 24/09/2009 to 31/05/2010 but the appellant has not been paid salary due to personal grudge, malafide and malice of the respondents' department which is discriminatory

against the law and rules and regulation. Copy of salary slip of similar S.S is as Annexure "D".

6. That feeling aggrieved, the appellant filed departmental appeal before the next higher authority on 27/07/2018. Copy of departmental appeal is attached as Annexure "E" but the reply is still awaited. Hence, the instant service appeal is filed inter-alia on the following grounds:-

GROUNDS:-

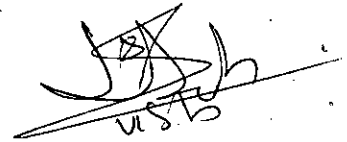
- a) That conduct of the respondents towards the appellant is discriminatory perverse against the law and policy in vogue. As per law, no authority with hold salary of their employees for the services rendered by them.
- b) That the appellant served the department with the sweat of her brows for earning her bread and butter. The stoppage of salary for the period, the appellant served the

department is against the fundamental rights as enshrined in the constitution.

- c) That when law authorize the appellant for payment of her salary, then the department is supposed to follow the law. The stoppage of salary of the appellant amounts to misconduct on the part of the respondents.
- d) That pay for the services rendered by the appellant is not a state bounty but it is a fundamental right of the appellant. Such attitude of the respondents towards the appellant is accountable at all forums.
- e) That the matter relates to the terms and conditions of services. Therefore, this Honourable Tribunal has jurisdiction to entertain the service appeal.
- f) That other legal and factual points involved in this case shall be agitated before the

Honourable Tribunal at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant service appeal the salary/emolument of appellant may graciously be granted w.e.f 24/09/2009 to 31/05/2010. Any other relief which this Honourable Court deems appropriate fit and proper in the circumstances of the case may also be granted.



...APPELLANT

Dated: 10/11 /2018

Through



(KALIMULLAH)
Advocate High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

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

Service Appeal No. _____/2018

Mehvish Munsif Subject Specialist (Statistic) (BPS-17) GGHS Keri Raiki,
Abbottabad.

...APPELLANT

VERSUS

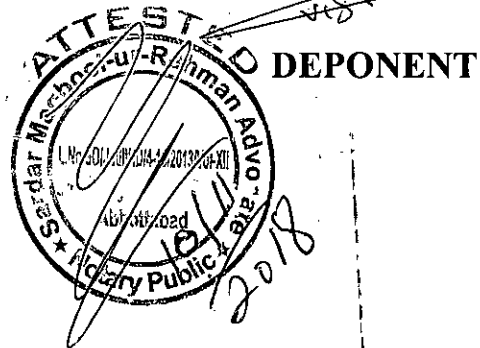
Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary
Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Mehvish Munsif Subject Specialist (Statistic) (BPS-17) GGHS Keri Raiki,
Abbottabad, do hereby solemnly affirm and declare that the contents of
forgoing service appeal are true and correct to the best of my knowledge and
belief and nothing has been concealed therein from this Honourable Court.



P-8

Annex "A"

Government of NWFP
Elementary & Secondary Education Department

No.SO(G)/E&SE/1-85/2008.SS(Contract)

Dated: Peshawar the December 26, 2008.

Notification

NO.SO(G)/E&SE/1-85/2008 SS(Contract): In pursuance of the powers conferred under Section 25 of the NWFP Civil Servant Act, 1973 the competent authority is pleased to appoint the following Female Subject Specialists (B-17) on contract basis as a stop-gap arrangements for a period of six months w.e.f. the date of assumption of charge or till the availability of selectees of the NWFP Public Service Commission / Departmental Selection Committee which ever is earlier:-

S.No	ID	Applicant Name	Father Name	District	Address	Subject	Posted At
1	4722	Farzana Bibi	Abdul Majeed	D.I.Khan	Home / Street :Basti Sheikh Yousaf PO :Rata Kulachi Village / Town :Basti Sheikh Yousaf UC / Tehsil / District :Rata Kulachi / D.I.Khan / D.I.Khan	Biology	GGHSS Titter Khel Lakki
2	4059	NARGIS	MUHAMMAD PERVAIZ	Malakand	Home / Street :GUNYAR ROAD PO :THANA Village / Town :THANA UC / Tehsil / District :THANA, BANDAJAT / SWAT RANIZAI / MALAKAND	Biology	GGHSS Koper Malakand A
3	2492	SHAISTA ZEB	ABDUL HAKAM	Swabi	Home / Street :Dheri Sar PO :Marghuz Village / Town :Marghuz UC / Tehsil / District :Swabi / Swabi / Swabi	Biology	GGHSS Gujrat Mardan
4	6115	Riffat Jabeen	khan afsar	Haripur	Home / Street :H.No 72 Sector No 1 PO :Kangra colony Village / Town :Kangra colony UC / Tehsil / District :Parian / Haripur / Haripur	Biology	GGHSS Khanpur Haripur
5	3626	Rahat Nosheen	Ghulam Sarwar	Abbottabad	Home / Street :Muhatah Sharif Khan PO :Sheikh-ul-Bandi Village / Town :Sheikh-ul-Bandi UC :Tehsil / District :Sheikh-ul-Bandi / Abbottabad / Abbottabad	Biology	GGHSS Shakardara Kohat
6	4415	Nargis Gul Wazir	Rehmat Ullah Khan	FR Bannu / Distri	Home / Street :247 / B, Rabnawaz Waki PO :City Bannu Village / Town :City Bannu UC / Tehsil / District :Bannu / Bannu / Bannu	Biology	Services placed at the disposal of Director Education FATA
7	5854	Nazneen Yousuf	Yousuf Hussain	Kurram Agency	Home / Street :Iltikhar House PO :Parachinar Village / Town :Pash Imam Colony UC / Tehsil / District :Parachinar / Parachinar / Kurram Agency	Biology	Services placed at the disposal of Director Education FATA
8	678	Zakia Begum	Abdullah	Swabi	Home / Street :Kram electric store PO :swabi Village / Town :mardan road swabi UC / Tehsil / District :maner payan / swabi / swabi	Biology	GGHSS Halhian Mardan
9	1351	RAHAT MAHEEN	Muhammad Ayub Khan	Nowshera	Home / Street :Adil Medicose PO :Taru Jabba Village / Town :GT Road Taru Jabba UC / Tehsil / District :Taru Jabba / Nowshera / Nowshera	Biology	GGHSS Gumbat Kohat
10	5794	Rahila Shad	Asif Khan	Charsadda	Home / Street : PO :Sardary Village / Town :Vilage Raheema UC / Tehsil / District : / Dist / Charsada	Biology	GGHSS Rashakai Nowshera
11	2956	Zubalda Sangal	Muhabat Khan	Chitral	Home / Street :booni PO :booni Village / Town :booni UC / Tehsil / District : :Mastuj / Mastuj / Chitral	Biology	GGHSS Dir Dir(Upper)
12	5711	Somayya Bibi	Noor Ul Wahab	Malakand	Home / Street :Ghari Usmani Khel PO :Ghari Usmani Khel Village / Town :Ghari Usmani Khel UC / Tehsil / District :Ghari Usmani Kh / Dargal / Malakand	Biology	GGHSS Ouch Dir(Lower)

Attested
by
Khalid
Advocate District Courts
Abbottabad

20

Sl. No	ID	Applicant Name	Father Name	District	Address	Subject	Posted At
13	582	Azra Ahmad	Ahmad Khan	Malakand	Home / Street : PO: Dargal Village / Dobandi UC / Tehsil / District Wara / Dargal / Malakand	Biology	GGHSS Timergara Dir(Low)
14	4180	ZAITOON AKHTAR	UMAR AYAZ	Kohat	Home / Street :HOUSE NO / T-415 ST#2 PO :HABIB ABAD KOHAT. Village / Town :ASHIQ COLONY KOHAT. UC / Tehsil / District :UC#S / KOHAT / KOHAT	Biology	GGHSS Lachi Kohat
15	5100	NAILA MEHJABEEN	ALLAH BAKHSH	D.I.Khan	Home / Street :CHAH PPAL WALA PO :G.P.O Village / Town :DRABAN ROAD, UC / Tehsil / District UC NO. 5 / D.I.KHAN / D.I.KHAN	Biology	GGHSS Teri Karak
16	1913	MARYAM RAUF	RAUF KHAN	Kohat	Home / Street :MOHALLA THORI PO :LACHI Village / Town :KHAIL PAYAN LACHI UC / Tehsil / District :KOHAT / KOHAT / KOHAT	Biology	GGHSS Billitang Kohat
17	1308	Farah saleem	Mohammad Saleem	Manshehra	Home / Street :Gandhian PO :Gandhian Village / Town :Gandhian UC / Tehsil / District Jnyal Abad / Manshehra / Manshehra	Biology	GGHSS Rabat Dir(Lower)
18	1139	Asia Bibi	Gohar Rehman	Haripur	Home / Street :Rehman Plaza , PO :Mohala thco,Haripur Village / Town :Gita Colege Road. UC / Tehsil / District :Haripur / Haripur / Haripur	Biology	GGHSS Kumbhar Dir(Lower)
19	73	KULSOOM SHAKIR	IRSHAD AHMAD SHAKIR	Manshehra	Home / Street :AL BASHEER BAFFA PO :BAFFA Village / Town :BAFFA MANSEHRA UC / Tehsil / District :BAFFA / MANSEHRA / MANSEHRA	Biology	GGHSS Mayar Dir(Lower)
20	1278	Salma	Dr Syed Abdus Sabooch Shah	Mardan	Home / Street :Ino 17, st 4, PO : Village / Town Rahat abad pesh UC / Tehsil / District :pabst / peshawar / peshawar	Biology	GGHSS Barawat Bandi Dir(Upper)
21	10018	Shazia Gul	Zumarad Khan	Haripur	Home / Street : PO :Bandi Seeran Village / Town :Thala UC / Tehsil / District : / Haripur / Haripur.	Chemistry	GGHSS Khanpur Haripur
22	1077	Zaib-un-Nisa	Payodar Khan	Karak	Home / Street :C / O Payodar Khan PO :GHSS Tough bala KOHa Village / Town :SET teacher UC / Tehsil / District : / / Kohat	Chemistry	GGHSS Teri Karak
23	2672	Shehla Gul	Muhammad Iqbal	D.I.Khan	Home / Street :Anjum abad PO :D.I.Khan. Village / Town :University road UC / Tehsil / District :D.I.Khan. / D.I.Khan. / D.I.Khan.	Chemistry	GGHSS Titter Khel Lakki
24	2556	Attiya Faizi	Inayatullah Faizi	Chitral	Home / Street :House no 4 Street 1 PO :Chitral Village / Town :Cobry Jughoor UC / Tehsil / District :Chitral / Chitral / Chitral	Chemistry	GGHSS Dir Dir(Upper)
25	1538	Kokab Durayen	Hafeez Ullah	Kohat	Home / Street :Muhala Hujaj - PO :Togh Bala Village / Town :Togh Bala UC / Tehsil / District :Togh Bala / Kohat / Kohat	Chemistry	Services placed at FATA the disposal of Director Education
26	13660	Naheed Anwar	Muhammad Hussain	Swabi	H/Street Haji Abad, VII & P.O. Karnal Sher Kali UC/Tehsil/District KSK/SWABI/Lahor	Chemistry	GGHSS Rashakal Nowshera
27	2924	Mrs. Faiza Sajjad	Saif-ur-Rehman	FR Kohat / Distri	Home / Street :House # T-26 PO :Moh Sangharh Village / Town :Moh Sangharh UC / Tehsil / District :Tehsil Kohat / District Kohat / District Kohat	Chemistry	Services placed at FATA the disposal of Director Education

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Attested

MOHALLA
Kohat
Director Education
FATA
Abdullahabad

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Applicant Name	Father Name	District	Address	Subject	Posted At
saima sabir	sabir shah	Swabi	Home / Street: Mohala Boba Khel PO / Topi Village / Town: Topi UC / Tehsil / District: / Topi / Swabi	Statistics	GGHSS TOPI Swabi
2265 Shahana Saeed	Abdul Saeed Mir	Peshawar	Home / Street: House no.241 / A-1 PO / GPO Saddar, Peshawar Village / Town: Naurhia Qadeem UC / Tehsil / District: / Peshawar / Peshawar	Statistics	GGHSS AKORA KHATTAK Nowshera
1393 Mrs. Nadia Zaman	Muhammad Zaman Khan	D.I.Khan	Home / Street: Gal Bagh Wal PO / D.I.Khan Village / Town: D.I.Khan UC / Tehsil / District: D.I.Khan / D.I.Khan / D.I.Khan	Statistics	GGHSS JUNGLE KHEL KOHAT
1652 Shahnaz Gul	Roidad Gul	Mardan	Home / Street: Near BHU PO / Shergah Village / Town: Sher Garh UC / Tehsil / District: shergah / lakht bhal / mardan	Statistics	GGHSS HATHIAN Mardan
1269 Mehvish Munsif	Munsif Khan	Haripur	Home / Street: PO: Abbottabad Village / Town: New Kehal Abbottabad UC / Tehsil / District: Kehal Urban / Abbottabad / Abbottabad	Statistics	GGHSS KHANPUR Haripur
183 4750 Farhana Gul	Umer Za Ali Khan	Bannu	Home / Street: Kotka Waja Din PO: P / O Khwaja Mad Village / Town: Mardan UC / Tehsil / District: Bannu / Bannu / Bannu	Statistics	GGHSS KOTKA BILAWAR KHAN Bannu
184 2043 NAZIA GUL	IHSAN UDDIN	Charsadda	Home / Street: AHMAD ABAD PO / TANGI Village / Town: TANGI UC / Tehsil / District: TANGI / TANGI / CHARSADDA	Statistics	GGHSS SHARPAO Charsadda
185 798 bushra jehanzeb	syed jehanzeb shah	Mardan	Home / Street: PO: mardan Village / Town: dagal UC / Tehsil / District: / mardan / mardan	Statistics	GGHSS KATLANG Mardan
186 1675 Shehla Gul	Ghulam Mehboob	Charsadda	Home / Street: street # 1 PO: Gul / Balur Village / Town: Sikandar Town UC / Tehsil / District: Sikandar Town / Peshawar	Statistics	GGHSS HARICHAND Charsadda
187 2660 farzana	Ihsanullah	Swat	Home / Street: mohallah fazal abad, PO / karju Village / Town: karju UC / Tehsil / District: karju / swat / swat	Statistics	GGHSS MATTA Swat
188 2315 NAHEED AKHTAR	USMAN GHANI	Malakand	Home / Street: Mohala Dhanda, PO / Thana Village / Town: Thana UC / Tehsil / District: Thana / Bakhela / Malakand	Statistics	GGHSS ODIGRAM Swat
189 5532 Arzoo Kanwal	Haji Hakeem-ud-Din	D.I.Khan	Home / Street: Rana Street PO / D.I.Khan Village / Town: D.I.Khan UC / Tehsil / District: UCA / D.I.Khan / D.I.Khan	Statistics	GGHSS RASHAKAI Nowshera
190 2218 Sehrish Razaq	Abdul Razaq	D.I.Khan	Home / Street: Mohallah ghana Wala PO / Dera Ismail Khan Village / Town: Near GGHS No. 1, UC / Tehsil / District: Dera Ismail Kha / Dera Ismail Kha	Statistics	GGHSS LAHOR Swabi
191 2974 Fozia Tehsin Jazla	Attahullah khan	D.I.Khan	Home / Street: Sheikh yousaf road PO / Sheikh yousaf Village / Town: Baran Abad UC / Tehsil / District: Rakka Kulachi / D.I.Khan / D.I.Khan	Statistics	GGHSS KABAL Swat
192 4345 Aliya Zakir	Muhammad Zakir Khan	Mansehra	Home / Street: Syed colony balfa PO / Balfa Village / Town: Balfa UC / Tehsil / District: Balfa / Mansehra / Mansehra	Statistics	GGHSS SHEWA Swabi

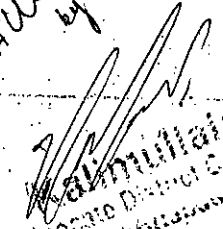
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Accepted
 Advocate District Courts
 Abbottabad

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S.No.	ID	Applicant Name	Father Name	District	Address	Subject	Posted At
193	940	Bushra Ashraf	Muhammad Ashraf	Abbottabad	Home / Street: C / O Irshad Shopkeeper PO: Abbottabad Village / Town: Near Makki Masjid UC / Tehsil / District: Kahal / Abbottabad / Abbottabad	Statistics	GGHSS KALU KHAN Swabi
194	1107	Nadia Sikandar	Muhammad Sikandar	Abbottabad	Home / Street: House # CB 37 PO: Abbottabad Village / Town: Rahmatabad UC / Tehsil / District: Abbottabad / Abbottabad / Abbottabad	Statistics	GGHSS SHAIDU Nowshera
195	1356	Aneela Kousar	Hafiz Fazal Rauf	Mardan	Home / Street: Alzal Imam Colony PO: Takht Bhal Village / Town: Takht Bhal UC / Tehsil / District: Takht Bhal / Takht Bhal / Mardan	Statistics	GGHSS TAKHT BAL Mardan
196	5011	Samina Naz	Muhammad Ramzan Khan	D.I.Khan	Home / Street: S / No 7 Ashiq Hotel PO: Zafar Abad Colony Village / Town: Zafar Abad Colony UC / Tehsil / District: Lachhra / D.I.Khan / D.I.Khan	Statistics	GGHSS MANGLOOR Swat
197	3215	Seema Kanwal	Muhammad Rafique	D.I.Khan	Home / Street: 127 / C PO: D.I.Khan Village / Town: Moh: Roshan Chragah UC / Tehsil / District: 4 / D.I.Khan / D.I.Khan	Statistics	GGHSS B/BANDI Dir(Upper)
198	1058	Lubna Iram	Karim Bakhsh	D.I.Khan	Home / Street: nil PO: nil Village / Town: MOH: QASABAN UC / Tehsil / District: UC-4 / D.I.Khan / D.I.Khan	Statistics	GGHSS Kalpani Buner
199	3199	SHAMSHAD BEGUM	SHAH DARAZ KHAN	Lakki	Home / Street: HOUSE#2, STREET#5 PO: GPO Village / Town: GILLANI TOWN UC / Tehsil / District: DEWALA / D.LUHAN / D.LUHAN	Statistics	GGHSS DIR Dir(Upper)
200	4528	UZMA	MUHAMMAD ZAMIN	Malakand	Home / Street: THANA KHADDI ABAD PO: THANA Village / Town: THANA UC / Tehsil / District: THANA KHASS / BATHELA / MALAKAND	Urdu	GGHSS Kalabat Swabi
201	2208	NARGIS BANNO	YOUSAF ALI AZAD	Bannu	Home / Street: HSE No 19 / B, Phase 1 PO: BANNU TOWN SHIP Village / Town: BANNU TOWN SHIP UC / Tehsil / District: BEZAN KHEL / BANNU / BANNU	Urdu	GGHSS BANNU Bannu
202	5153	Zohra Jabeen	M.Sadiq	Abbottabad	Home / Street: C / o Sardar Ashraf PO: Malsa Village / Town: Malsa UC / Tehsil / District: Phakot / Abbottabad / Abbottabad	Urdu	GGHSS PACHA KALAY Buner
203	5263	NOSHABA KHAN	REHMAT DIN	Haripur	Home / Street: NIL PO: KHOLIAN BALA Village / Town: KHOLIAN BALA UC / Tehsil / District: KHOLIAN BALA / HARIPUR / HARIPUR	Urdu	GGHSS KUMBAR Dir(Lower)
204	2301	Rubina Iltmas	Dilpazir	Haripur	Home / Street: Masjid Noor PO: Saral Saleh Village / Town: Saral Saleh UC / Tehsil / District: Saral Saleh / Haripur / Haripur	Urdu	GGHSS KALPANI Buner
205	4936	Nasreen Wazir	Ghani-ur-Rahman	FR Bannu / Distri	Home / Street: Frontier Constabular PO: P.S.O 1 House Village / Town: Officers Colony UC / Tehsil / District: Inside Civil / Qtr Kohal Road / Peshawar	Urdu	Services placed at the disposal of Director Education FATA
206	587	SALMA BIBI	AKBAR ZAMAN	FR Bannu / Distri	Home / Street: SHAH HUSSAIN PO: AZIM KILLA Village / Town: VILLAGE SHAH HUSSAIN UC / Tehsil / District: ZERAKI PIRBA KH / BANNU / BANNU	Urdu	Services placed at the disposal of Director Education FATA
207	3511	Saima Gul	Anwar Khan Anwar	Charsadda	Home / Street: PO: Charsadda Village / Town: mira khal UC / Tehsil / District: / Charsadda / Charsadda	Urdu	GGHSS Shahbaz Mardan Garhi

Accepted by

 Advocate
 Advocate District Court
 Abbottabad

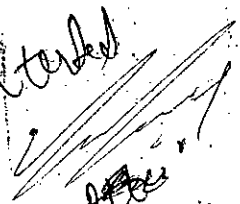
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No	ID	Applicant Name	Father Name	District	Address	Subject	Post
100		ISMAT BEGUM	ARSALA KHAN	Peshawar	Home / Street :Vilaga Sufeld Dohrl PO :Peshawar University Village / Town :Mohallah Nawab Abad UC / Tehsil / District :Peshawar / Peshawar / Peshawar	Urdu	Services placed at the disposal of Director Education FATA
209	4	Mrs.Bismina Siraj	Mr. Bakhtiar Ahmed	Peshawar	Home / Street :Javedabad Acher Road PO :Technical College Village / Town :Kohat Road, Peshawar UC / Tehsil / District :Bahadur Kalai / Peshawar / Peshawar	Urdu	GGHSS Katlang Mardan
210	5079	Abida Shams	Shamsur Rahman	Chitral	Home / Street :Danin PO :Chitral Village / Town :Danin UC / Tehsil / District :Danin / Chitral / Chitral	Urdu	GGHSS DIR Dir(Upper)
211	771	Farzana Bibi	Rab Nawaz Khan	Malakand	Home / Street :C / o Rab Nawaz Khan PO :Molna Village / Town :Molna UC / Tehsil / District :Kot / Balhela / Malakand	Urdu	GGHSS SAMARBAGH Dir(Lower)
212	5896	Nabila Shams	Shamsur Rahman	Dir Lower	Home / Street :Gari Chakdara PO :Chakdara Village / Town :Gari Chakdara UC / Tehsil / District :Chakdara / Adenzal / Dir (Lower)	Urdu	GGHSS Ziarat Talash Dir(Lower)
213	3590	Rahila Noreen	Abdul Majeed	Tank	Home / Street :Mohalla Qasaban, PO :Tank Village / Town :Tank city UC / Tehsil / District :city / Tank / District	Urdu	Services placed at the disposal of Director Education FATA
214	176	Suriya Sikandar	Muhammad Sikandar	Bannu	Home / Street :Zakar Khel PO :Nazam Bazar Village / Town :Zakar Khel UC / Tehsil / District :Nazam bazar / bannu / bannu	Urdu	GGHSS GUMBAT Kohat
215	1912	Aisheen Fiaz	Muhammad Fiaz	Mansehra	Home / Street : PO :Bherkund Village / Town :Hafeez Bandi UC / Tehsil / District :Inayat Abad / Mansehra / Mansehra	Urdu	GGHSS MAYAR Dir(Lower)
216	3049	Bibi Mahtab	Niamat Ullah	Mansehra	Home / Street : PO :Dadar Sanatorium Village / Town :Dadar Haryalah UC / Tehsil / District :Bhogamang / mansehra / mansehra	Urdu	GGHSS Barawal Bandi Dir(Upper)
217	1752	Nadia Iqbal	Muhammad Iqbal	Abbottabad	Home / Street :1488 / 12 TC, PO :Alama Iqbal Colony, Village / Town :Noor-ud-Din Street, UC / Tehsil / District :Muree Road / Jogen / Abbottabad	Urdu	GGHSS Bililang Kohat

Terms and conditions of their appointments

- i) The appointment of the above candidates will be on contract basis for the period of six months from the date of assumption of charge or till the arrival of the selectees of the NWFP Public Service Commission / Departmental Selection Committee, whichever is earlier.
- ii) They will get pay in BPS-17.
- iii) No TA/DA will be allowed.
- iv) The appointment of the candidates mentioned in Para-I above is subject to the condition that they bear the Domicile of NWFP/FATA.
- v) If they want to terminate their contract before expiry of the same, they will have to serve one month notice in advance failing which they will have to deposit one month pay in lieu of such notice, in the Government Treasury.
- vi) They shall not make any request for transfer from the School where they are posted. In case of such occurrence, their service shall stand terminated.
- vii) They should join their post within 30-days of the issue of this notification. The Director Elementary Secondary Education NWFP, Peshawar, should furnish certificate to the effect that the candidates have joined the post or otherwise after one month of the issue of this Notification.
- viii) They shall execute an agreement with the Government before taking over charge to be signed by the Section Officer (General) of Elementary Secondary Education Department, Govt of NWFP, on behalf of the Government.

Attested

Kalimullah
 Advocate District Courts
 Abbottabad

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S.No	ID	Applicant Name	Father Name	District	Address	Subject	Posted At
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- (ix) They will not be entitled to any pension or gratuity for the service rendered by them on contract basis.
- (x) Charge report in duplicate should be submitted to all concerned.
- (xi) Their service shall be terminated if they violate any provision of the terms and conditions specified in the agreement Bond.
- (xii) They shall not be entitled to perform any examination duty of the BISEs/Universities during the currency of the contract.

Secretary
Elementary & Secondary Education
Department, Government of NWFP Peshawar

ENDST:NO DATE EVEN:

Copy of the above is forwarded to:

- 1) Accountant General, NWFP Peshawar.
- 2) Director of Information, NWFP Peshawar.
- 3) Director Elementary Secondary Education NWFP, Peshawar.
- 4) Director Education FATA, Peshawar.
- 5) All Chairmen of BISE/Registrars of Universities in NWFP.
- 6) District Accounts Officer concerned.
- 7) Executive District Officer (ESE) concerned.
- 8) Principals of the School concerned.
- 9) Officer concerned.
- 10) PS to Minister for Elementary & Secondary Education NWFP
- 11) PS to Secretary to Govt: of NWFP E&SE Department.

Farid Ahmad Khattak
Section Officer (General)

Attended
 K. S. J. KHAN
 ADVOCATE GENERAL
 PESHAWAR

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar, the 31-05-2010

Annex

cc "B"

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NOTIFICATION.

NO. SO(G) E&S/1-85/2009/SS/CONTRACT: In pursuance of the powers conferred under Section 25 of the NWFP Civil Servant Act, the Competent Authority is pleased to regularize the services of the following contract employees: Female (Subject Specialists) (BPS-17) in various Subjects in Elementary & Secondary Education Department w.e.f 24-09-2009 under the NWFP, Employees (Regularization of Services) Act, 2009 on the terms and conditions given at end of this notification.

S.#	NAME WITH FATHER NAME	DOMICILE	SUBJECT	PLACE OF POSTING
1.	SAIMA SHAMRAIZ D/O SHAMRAIZ KHAN	ABBOTTABAD	BIOLOGY	GGHSS SHERWAN (ABBOTTABAD)
2.	ASIA JAHAN D/O ABDU RAUF	BANNU	BIOLOGY	GGHSS KOTI SADAAT (BANNU)
3.	NEELOFAR KAUSAR D/O REHMATULLAH	CHARSADDA	BIOLOGY	GGHSS HARICHAND CHARSADDA
4.	BIBI YASMEEN D/O MOHD ESSA KHAN	DIR	BIOLOGY	GGHSS SAMAR BAGH DIR LOWER
5.	ZUBAIDA D/O MOHABAT KHAN	CHITRAL	BIOLOGY	GGHSS DIR UPPER
6.	SALMA D/O S ABDUL SABOH SHAH	MARDAN	BIOLOGY	GGHSS BARAWAL BANDI
7.	SANA DIL NASHEEN D/O M HANEEF TARIQ	DIKHAN	BIOLOGY	GGHSS PAROA (DIK)
8.	ASIA BIB D/O GOHAR-REHMAN	HARIPUR	BIOLOGY	GGHSS BANDI MUNEEB HARIPUR
9.	RIFFAT JABEEN D/O KHAN AFSAR	HARIPUR	BIOLOGY	GGHSS KHANPUR (HARIPUR)
10.	HALEEMA SHAKIR D/O IRSHAD AHMAD SHAKIR	HARIPUR	BIOLOGY	GGHSS KOT NAJIBULLAH (HARIPUR)
11.	ZAITOON AKHTAR D/O UMAR AYAZ	KOHAT	BIOLOGY	GGHSS LACHI KOHAT
12.	TASLEEM BEGUM D/O AHMAD KHAN	KARAK	BIOLOGY	GGHSS SHAKARDARA KOHAT
13.	SHAHBANA NAZ D/O ABDUL MALIK	CHARSADDA	BIOLOGY	GGHSS SHAHBAZ GHARI MARDAN
14.	TABASUM YASEEN D/O YASEEN KHAN	MARDAN	BIOLOGY	GGHSS KATLUNG (MARDAN)
15.	RAHEELA SHAD D/O ASIF KHAN	CHARSADDA	BIOLOGY	GGHSS RASHAKI (NSR)
16.	JEHAN ARA GUL D/O MOHD BAHADAR KHAN	SWABI	BIOLOGY	GGHSS LAHORE (SWABI)
17.	ASMA SHEHZADI D/O	SWABI	BIOLOGY	GGHSS KALO KHAN (SWABI)
18.	SHAISTA ZEB D/O ABDUL HAKAM	SWABI	BIOLOGY	GGHSS KOTA (SWABI)
19.	NARGAS GUL WASIR D/O REHMATULLAH	FR BANNU	BIOLOGY	At the disposal of Director FATA Education for further posting.
20.	NAZNEEN YOUSAF D/O YOUSAF HUSSAIN	KORAM AGY	BIOLOGY	At the disposal of Director FATA Education for further posting.
21.	RIFFAT NAZLI D/O		BIOLOGY	At the disposal of Director FATA Education for further posting.
22.	ZAHIDA BIBI D/O SHER KHAN	ABBOTTABAD	CHEMISTRY	GGHSS LORA ABBOTTABAD

E:- Aziz SS Regularization (F)

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Attested
Kasimullah
Advocate General Courts

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23.	RIFFAT BIBI D/O SAADULLAH JAN	LAKKI	CHEMISTRY	GGHSS GHORI (BANNU)
24.	SAIMA KAMAL D/O MUSTAFA KAMAL	DIR LOWER	CHEMISTRY	GGHSS OCH (DIR LOV)
25.	RIFFAT NAZ D/O AALAN KHAN		CHEMISTRY	GGCMS TIMERGARA DIR LOWER
26.	ATIA FOZI D/O INAYATULLAH	CHITRAL	CHEMISTRY	GGHSS DIR UPPER
27.	SAMEENA IKRAM D/O IKRAMULLAH	DIKHAN	CHEMISTRY	GGHSS PAROA (DIK)
28.	SHAHIDA D/O AMANULLAH	DIKHAN	CHEMISTRY	GGHSS PAHARPUR (DIK)
29.	SAJIDA KANWAL D/O KHALIQ DAD	DIKHAN	CHEMISTRY	GGHSS PAHARPUR (DIK)
30.	ASIYA BIBI D/O SYED GULZAR SHAH	MANSEHRA	CHEMISTRY	GGHSS BANDI MUNEEM HARIPUR
31.	FOZIA WAHID D/O MOHD WAHID	HARIPUR	CHEMISTRY	GGHSS PANIAN (HARIPUR)
32.	NIMAT BIBI D/O MOHD KARIM	KOHAT	CHEMISTRY	GGHSS BILI TANG KOHAT
33.	NESHAT BIBI D/O WARIS KHAN	KOHAT	CHEMISTRY	GGHSS LACHI KOHAT
34.	MUSARAT SHAHEEN D/O SAID MOHD ALI	KARAK	CHEMISTRY	GGHSS GOMBAT KOHAT
35.	ZABUN NISA D/O PAO DAR	KARAK	CHEMISTRY	GGHSS TERI (KARAK)
36.	HALEEMA RAUF D/O SAID RAUF	MARDAN	CHEMISTRY	GGHSS GUMBAT (MARDAN)
37.	NAHEED ANWAR D/O MOHD HUSSAIN	SWABI	CHEMISTRY	RITE (F) SWABI in her own pay & scale.
38.	SAFIA D/O FAZAL WAHID	MKD/AGY.	CHEMISTRY	GGHSS ZIARAT TALASH DIR LOWR
39.	FARHAT KAUSAR D/O AMIR KHEIRO	MANSEHRA	CHEMISTRY	GGHSS BAFFA (MANSEHRA)
40.	LUBNA SHAUKAT D/O AURANGZEB	MANSEHRA	CHEMISTRY	GGHSS G/HABIBULLAH/Mansehra
41.	NUZHAT JABEEN D/O MOHD YOUNAS	MANSEHRA	CHEMISTRY	GGHSS Oghi (MANSEHRA)
42.	ASMAT BIBI D/O GHULAM SARWAR	SWABI	CHEMISTRY	GGHSS LAHORE (SWABI)
43.	BIBI ZUHRA D/O TOTI REHMAN	SWAT	CHEMISTRY	GGHSS MANGLOR (SWAT)
44.	KOKAB DUR YAEN D/O HAFIZULLAH	FR KOHAT	CHEMISTRY	At the disposal of Director FATA Education for further posting
45.	SHAZIA GUL D/O ZAMARUD KHAN	HARIPUR	CHEMISTRY	GGHSS KHANPUR (HARIPUR)
46.	MARYAM SADIQA D/O RUHOOL AMEEN	SWABI	CHEMISTRY	GGHSS SHAHBAZ GHARI MARDAN
47.	NAZIA D/O ABDUR REHMAN	MALAKAND	CIVICS	GGHSS UTMAN ZAI (CHARSADDA)
48.	SHAZIA JABEEN D/O SELAHUD DIN	PESHAWAR	CIVICS	GGHS SHABQADAR (CHARSADDA)
49.	NAJMA NAZIR D/O NAZIR GUL	CHARSADDA	CIVICS	GGHSS SHERPAO (CHARSADDA)
50.	MEHER GUL D/O SAFDAR KHAN	ABBOTTABAD	ECONIMICS	GGHSS HAJIA GALI ABBOTTABAD
51.	TANZEELA NAZ D/O AMANULLAH	CHARSADDA	ECONMICS	GGHSS UTMAN ZAI (CHARSADDA)
52.	ZAINAB BIBI D/O ABDUL BAQI	ABBOTTABAD	ECONOMICS	GGHSS LORA ABBOTTABAD
53.	SHAISTA SIKANDAR D/O SIKANDAR KHAN	ABBOTTABAD	ECONOMICS	GGHSS SHERWAN (ABBOTTABAD)
54.	SHAZIA FAIZ BALOCH D/O FAIZULLAH	DIKHAN	ECONOMICS	GGHSS SHAHBAZ AZMAT KHEL (BANNU)

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Attested
Kaliqul Khan
Advocate District Court
Abbottabad

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56.	NASEEM AKHTAR D/O DAULAT KHAN SABAHAT YOUSAF D/O MOHD YOUSAF	NOWSHERA PESHAWAR	ECONOMICS ECONOMICS	GGHS SHABQADAR (CHARSADDA) GGHSS HARICHAND CHARSADDA
57.	ATIA D/O GHULAM REHMAN	MALAKAND	ECONOMICS	GGHSS CHAKDARA (DIR LOWER) GGHSS PAROA (DIK)
58.	FARZANA D/O HAJI MUSTAQIM	DIKHAN	ECONOMICS	GGHSS KULACHI (DIK)
59.	GHAZALA RASHEED D/O RASHEED AHMAD	DIKHAN	ECONOMICS	GGHSS GOMBAT KOHAT
60.	SHAWANA BIBI D/O AHMAD SHAH	KOHAT	ECONOMICS	GGHSS KATLANG (MARDAN)
61.	RUKHSANA IRAM BIBI D/O SAID QAYYUM	MARDAN	ECONOMICS	GGHSS RUSTAM (MARDAN)
62.	NAJMUS SAHAR D/O MUZAMIL HUSSAIN	MARDAN	ECONOMICS	GGHSS KATLUNG (MARDAN)
63.	JAMILA NAZ D/O KHAN DALI	MARDAN	ECONOMICS	GGHSS HATHIYAN (MARDAN)
64.	NAILA BEGUM D/O SARDAR ALI	MARDAN	ECONOMICS	GGHSS BALAKOT (MANSEHRA)
65.	IRAM SHEHZADI D/O MISKEEN SHAH	MANSEHRA	ECONOMICS	GGHSS G/HABIBULLAH/Mansehra
66.	MADIHA GUL D/O M MUZAFAR KHAN	MANSEHRA	ECONOMICS	GGHSS D ISMAIL KHEL (NSR)
67.	SADIA BUSHRA D/O M ARIF	PESHAWAR	ECONOMICS	GGHSS TOPI (SWABI)
68.	SUMIYAH BASHIR D/O BASHIR AHMAD	PESHAWAR	ECONOMICS	GGHSS MATTA (SWAT)
69.	RAMEEM D/O SAEED	SWAT	ECONOMICS	GGHSS MANGLOR (SWAT)
70.	FARIDA D/O MOHRAM GUM	SWAT	ECONOMICS	At the disposal of Director FATA Education for further posting
71.	NIJAT NAWAZ D/O RAB NAWAZ	MOH- AGY	ECONOMICS	GGHSS PAHARPUR (DIK)
72.	KOMAL NADIA D/O TALIB HUSSAIN ASHRAF	DIKHAN	ENGLISH	GGHSS HAVELIAN (ABBOTTABAD)
73.	SOBIA TABASSUM D/O ABDUL MALIK KHAN	ABBOTTABAD	ENGLISH	GGHSS KAKKI (BANNU)
74.	GULNAZ D/O ABDUL QADEEM SHAH	BANNU	ENGLISH	GGHSS KOTKA BILAWAR KHAN (BANNU)
75.	SHAKEELA AKHTAR D/O NIZAM KHAN	LAKKI	ENGLISH	GGHSS OCH (DIR LOWER)
76.	SEEMA D/O FARMANULLAH	MALAKAND	ENGLISH	GGHSS ODIGRAM (SWAT)
77.	NAJMA KHAN D/O MOHD SOHRAB KHAN	DIR LOWER	ENGLISH	GGHSS PAROA (DIK)
78.	GHAZALA BATOOL D/O SONA KHAN	DIKHAN	ENGLISH	GGHSS BANDI MUNEEM HARIPUR
79.	RANA SHOAKAT D/O SHOAKAT ZAMAN	HARIPUR	ENGLISH	GGHSS PANIAN (HARIPUR)
80.	SOBIA BANO D/O SYED IQBAL SHAH	HARIPUR	ENGLISH	GGHSS BABRI BANDA KOHAT
81.	SOBIA AHMAD D/O AHMAD SHAH	KOHAT	ENGLISH	GGHSS CHOKARA (KARAK)
82.	NEELOFAR D/O MISAL MOHD	KARAK	ENGLISH	GGHSS TITTER KHEL (LAKKI)
83.	NAZIA NAWAZ D/O HAQ NAWAZ	LAKKI	ENGLISH	GGHSS HATHIYAN (MARDAN)
84.	NADIMA SHAHEEN D/O ABDUL KAMAL	MARDAN	ENGLISH	GGHSS RUSTAM (MARDAN)
85.	AKHTAR NAQASHBAND D/O GHULAM NAQASHBAND	PESHAWAR	ENGLISH	GGHSS TURO (MARDAN)
86.	SADIA MUMTAZ D/O MUMTAZ AHMAD	MARDAN	ENGLISH	

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E:- Aziz SS Regularization (F)

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 M. M. Mulla
 Additional District Court
 Abbottabad

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87.	NABILA D/O M RASHID	MKD/AGY	ENGLISH	GGHSS SAKHAKOT (M)
88.	ZAHIDA BIBI D/O MOHD YUNAS	MANSEHRA	ENGLISH	GGHSS BAFFA (MANSEHRA)
89.	AMBREEN SALEEM D/O SALEEM AFZAL	MANSEHRA	ENGLISH	GGHSS BALAKOT (MANSEHRA)
90.	SETARA ZAHID D/O MOHD SARWAR	MANSEHRA	ENGLISH	GGHSS G/HABIBULLAH/Mansehra
91.	SIDRATUL MUNTAHA D/O MOMTAZ KHAN	MANSEHRA	ENGLISH	GGHSS OGHAI (MANSEHRA)
92.	SAIMA GUL D/O FAZAL SUBHAN	NOWSHERA	ENGLISH	GGHSS RASHAKI (NSR)
93.	NIGHAT KHAN D/O MISAL KHAN	NOWSHERA	ENGLISH	GGHSS NOWSHERA KALAN (NSR)
94.	HINA D/O FARIDULLAH	FR BANNU	ENGLISH	At the disposal of Director FATA Education for further posting
95.	SAIQA IQBAL D/O MOHD IQBAL	BANNU	H/ CUM CIVICS	GGHSS GHORI WALA (BANNU)
96.	ROBINA KONDI D/O SHAHJEHAN KONDI	LAKKI	H/ CUM CIVICS	GGHSS SHABAZ AZMAT KHEL (BANNU)
97.	SHUMAILA FARID D/O MOHD FARID	ABBOTTABAD	H/CIVICS	GGHSS LORA ABBOTTABAD
98.	SHAHIDA PARVEEN D/O MOHD KALEEM	ABBOTTABAD	H/CIVICS	GGHSS HAJIA GALI ABBOTTABAD
99.	TAYYABA D/O MIAN HAZRAT	BANNU	H/CUM CIVICS	GGHSS PACHA KALEY (BUNER)
100.	ABIDA D/O KACHKOL KHAN	DIR LOWER	H/CUM CIVICS	GGHSS ZIARAT TALASH DIR (L)
101.	SHAISTA TEHSEEN D/O IRSHAD MOHD	HARIPUR	H/CUM CIVICS	GGHSS BANDI MUNEEB HARIPUR
102.	RABIA BIBI D/O TALIB SHAH	MANSEHRA	H/CUM CIVICS	GGHSS PANIAN (HARIPUR)
103.	HIDAYAT BIBI D/O ABDUS SATTAR	MARDAN	H/CUM CIVICS	GGHSS SAWAL DHER (MARDAN)
104.	GUL MEENA D/O NOWSHERAWAN	SWABI	H/CUM CIVICS	GGHSS SHAHBAZ GHARI MARDAN
105.	ALMIAT YASMEEN D/O SHAKIRULLAH	MARDAN	H/CUM CIVICS	GGHSS HATHIYAN (MARDAN)
106.	TOHEED MURAD D/O MURAD ALI SHAH	MARDAN	H/CUM CIVICS	GGHSS SHAHDAND (MARDAN)
107.	NADIA RAUF D/O ADUL RAUF	MARDAN	H/CUM CIVICS	GGHSS TAKHT BHAI (MARDAN)
108.	IRAM HASSAN D/O MIR HASSAN	MKD/AGY	H/CUM CIVICS	GGHSS SAKHAKOT (MKD)
109.	ROOMI GUL D/O ANWAR UL HAQ	MKD/AGY	H/CUM CIVICS	GGHSS KOPER (MKD)
110.	ANEEQA YOUSAF D/O MOHD YOUSAF	MANSEHRA	H/CUM CIVICS	GGHSS BALAKOT (MANSEHRA)
111.	S SAIRA BATOOL D/O S LAL HUSSAIN SHAH	MANSEHRA	H/CUM CIVICS	GGHSS G/HABIBULLAH/Mansehra
112.	SABINA BEGUM D/O SADAM MOHD	SWABI	H/CUM CIVICS	GGHSS SHaidu (NSR)
113.	FARAH DEEBA D/O SYED SHAFAT AHMAD	PESHAWAR	H/CUM CIVICS	GGHSS LAHORE (SWABI)
114.	ROBINA NAZ D/O YAR KAND	SWABI	H/CUM CIVICS	GGHSS KOTA (SWABI)
115.	SHENAZ D/O FAZAL DAD	SWAT	H/CUM CIVICS	GGHSS MATTa (SWAT)
116.	ISHRAT D/O MIAN GUL DARWAISH	SWAT	H/CUM CIVICS	GGHSS KABAL (SWAT)
117.	SAFIA BIBI D/O SHOABULLAH	BANNU	ISLAMIYAT	GGHSS S.K BALa (BANNU)
118.	FOZIA SABA D/O GUL DARAZ KHAN	BANNU	ISLAMIYAT	GGHSS SHAHBAZ AZMAT KHEL (BANNU)

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Attorney
 Adv. M. M. Mulla
 Advocate District Court
 Abbottabad

119.	QAIN TA HAQ D/O SIRAJ UL HAQ	CHARSADDA	ISLAMIYAT	GGHSS UMARZAI (CHARSADDA)
120.	MEHNAZ FERDOUS D/O FERDOUS KHAN	MALAKAND	ISLAMIYAT	GGHSS CHAKDARA (DIR LOWER)
121.	FARIDA BEGUM D/O NEK MOHD	SWAT	ISLAMIYAT	GGHSS KUMBAR (DIR LOWER)
122.	GUL YASMEEN D/O M SALEEM KHAN	CHITRAL	ISLAMIYAT	GGHSS DIR UPPER
123.	FARZANA SHAHEEN D/O MOHD ASLAM	HARIPUR	ISLAMIYAT	GGHSS KHANPUR (HARIPUR)
124.	SADIA MEHMOOD D/O MEHMOOD REHMAN	KOHAT	ISLAMIYAT	GGHSS LACHI KOHAT
125.	ALIA BIBI D/O ABDUL WADOOD	KOHAT	ISLAMIYAT	GGHSS GOMBAT KOHAT
126.	RUKHSANA BEGUM D/O RAEES KHAN	KARAK	ISLAMIYAT	GGHSS CHOKARA (KARAK)
127.	BIBI ASIA D/O ABDUL WAHAB	KARAK	ISLAMIYAT	GGHSS CHOKARA (KARAK)
128.	FARHANA BEGUM D/O HABIB UR REHMAN	KARAK	ISLAMIYAT	GGHSS TERI (KARAK)
129.	JAMILA AZIZ D/O AZIZ UR REHMAN	CHARSADDA	ISLAMIYAT	GGHSS KATLANG (MARDAN)
130.	SAFIA NAZ QAZI D/O QAZI TAJUL ARIFEEN	NOWSHERA	ISLAMIYAT	GGHSS SAWAL DHER (MARDAN)
131.	SAIMA WAHID D/O WAHID KHAN	MARDAN	ISLAMIYAT	GGHSS HATHIYAN (MARDAN)
132.	BIBI HAJRA D/O PIR MOHD	MANSEHRA	ISLAMIYAT	GGHSS G/HABIBULLAH/Mansehra
133.	HUMAIRA HABIBI D/O HABIBULLAH SHAH	LAKKI	ISLAMIYAT	GGHSS D ISMAIL KHEL (NSR)
134.	SHAHIDA RAHEEM D/O M ABUR RAHIM	PESHAWAR	ISLAMIYAT	GGHSS RASHAKI (NSR)
135.	MUSARAT D/O HIDAYATULLAH	NOWSHERA	ISLAMIYAT	GGHSS KHAIR ABAD (NSR)
136.	NAZISH AKHTAR D/O SYED JAFAR SHAH	SWABI	ISLAMIYAT	GGHSS KOTA (SWABI)
137.	NASEEM AKHTAR D/O	SWAT	ISLAMIYAT	GGHSS KABAL (SWAT)
138.	NOREENA D/O SHAKOR KHAN	MOH. AGY	ISLAMIYAT	At the disposal of Director FATA Education for further posting
139.	HUSNA D/O GHULAM SARWAR	MOH. AGY	ISLAMIYAT	At the disposal of Director FATA Education for further posting
140.	NAZIA SHAHEEN D/O SADIQ HUSSAIN	ABBOTTABAD	ISLAMIYAT	GGHSS MALIK PURA ABBOTTABAD
141.	SAMINA BIBI D/O MOHD YUNAS	ABBOTTABAD	MATHS	GGHSS LORA ABBOTTABAD
142.	SAIQA GUL D/O GULZAR KHAN	ABBOTTABAD	MATHS	GGHSS SHERWAN (ABBOTTABAD)
143.	ZAHIDA PARWEEN D/O SIKANDAR KHAN	ABBOTTABAD	MATHS	GGHSS HAVELIAN (ABBOTTABAD)
144.	SHAHIDA SHABNUM D/O WALI UR REHMAN	ABBOTTABAD	MATHS	GGHSS MALIK PURA ABBOTTABAD
145.	RIFFAT HALIL D/O HALIL UR REHMAN	ABBOTTABAD	MATHS	GGHSS HAJIA GALI ABBOTTABAD
146.	SHAKEELA D/O MOHD AKBAR	DIKHAN	MATHS	GGHSS KAKKI (BANNU)
147.	MEHNAZ SHAH D/O MOHD SHAH	MARDAN	MATHS	GGHSS HARICHANDI CHARSADDA
148.	SAHMSHAD BIBI D/O S. MOHABAT SHAH	CHITRAL	MATHS	GGHSS DIR UPPER
149.	MADEELA BATOOL D/O RIAZ	DIKHAN	MATHS	GGHSS PAHARPUR (DIK)

Attested
M. Anwarullah
 District Courts
 Abbottabad

150.	SADIQ RIAZ D/O MOHD RIAZ	HARIPUR	MATHS	GGHSS BANDI HARIPUR
151.	NAZISH JALIL D/O JALIL QURESHI	HARIPUR	MATHS	GGHSS KHANPUR (HARIPUR)
152.	UMBER RABAIL D/O KHIZER HAYAT	KOHAT	MATHS	GGHSS LACHI KOHAT
153.	TASLEEM FATIMA D/O GHULAM SADIQ	KARAK	MATHS	GGHSS CHOKARA (KARAK)
154.	TAYYABA TAJ D/O TAJBAR KHAN	SWABI	MATHS	GGHSS SHAHBAZ GHARI MARDAN
155.	SAIMA NOREEN D/O HALEEL UR REHMAN	MANSEHRA	MATHS	GGHSS OGI (MANSEHRA)
156.	NUSRAT D/O SAID AKBAR	NOWSHERA	MATHS	GGHSS KHAIR ABAD (NSR)
157.	MARUKH D/O MOHD ARIF KHAN	SWABI	MATHS	GGHSS LAHORE (SWABI)
158.	SHAISTA GUL D/O AKBAR ALI	SWAT	MATHS	GGHSS MATTA (SWAT)
159.	NADIA RAZAQ D/O ABDUL RAZAQ	PESHAWAR	MATHS	At the disposal of Director FATA Education for further posting
160.	GUL RUKH D/O M RAZIQ	MKD/AGY	PAK STUDY	GGHSS KOPER (MKD)
161.	NASREEN SALEEM D/O M SALEEM	ABBOTTABAD	PAKSTUDY	GGHSS HAJIA GALI ABBOTTABAD
162.	NAILA BEGUM D/O ROOHULLAH	KARAK	PAKSTUDY	GGHSS S K. BALI (BANNU)
163.	SHAZIA REHMAN D/O ABDUR REHMAN	HARIPUR	PAKSTUDY	GGHSS PACHA KALEY (BUNER)
164.	NAILA GOHAR D/O GOHAR ZAMAN	CHARSADDA	PAKSTUDY	GGHSS UTMAN ZAI (CHARSADDA)
165.	ASMA ISHFAQ D/O MOHD ISHFAQ	PESHAWAR	PAKSTUDY	GGHS SHABQADAR (CHARSADDA)
166.	ZAKIA RAZZAQ D/O ABDUL RAZAQ	MALAKAND	PAKSTUDY	GGHSS OCH (DIR LOWER)
167.	JAVERIYA ASGHAR D/O MOHD ASGHAR	HARIPUR	PAKSTUDY	GGHSS BANDI MUNEEM HARIPUR
168.	SANIA AMAN D/O AMANULLAH	KOHAT	PAKSTUDY	GGHSS GOMBAT KOHAT
169.	SYEDA AKHTAR D/O AKBAR ALI KHAN	KARAK	PAKSTUDY	GGHSS TERI (KARAK)
170.	SHABNUM HAZ D/O MOHSIN KHAN	LAKKI	PAKSTUDY	GGHSS TITTER KHEL (LAKKI)
171.	NIDA BIB D/O MOHD RAFIQ	MANSEHRA	PAKSTUDY	GGHSS AKORA KHATAK (NSR)
172.	RAHIMA GUL D/O	SWABI	PAKSTUDY	GGHSS TOPI (SWABI)
173.	FAHEEMA GUL D/O MOHD WALI	SWABI	PAKSTUDY	GGHSS KOTA (SWABI)
174.	HASINA D/O	SWABI	PAKSTUDY	GGHSS LAHORE (SWABI)
175.	ZAINAB D/O NIMATULLAH	DIKHAN	PHYSICS	GGHSS KAKKI (BANNU)
176.	ADEELA IQBAL D/O MOHD IQBAL	DIKHAN	PHYSICS	GGHSS KOTI SADAAT (BANNU)
177.	SHABANA SULTANA D/O REHM BADSHAH	KARAK	PHYSICS	GGHSS SHAKARDARA KOHAT
178.	MARYAM BIBI D/O MOHD ILTAF HUSSAIN	KARAK	PHYSICS	GGHSS LACHI KOHAT
179.	ZINAT ARA D/O SARDAR HUSSAIN	SWAT	PHYSICS	GGHSS KABAL (SWAT)
180.	NAZIA GUL D/O IHSANUDIN	CHARSADDA	STATISTICS	GGHSS SHERPAO (CHARSADDA)
181.	SEHRISH RAZAQ D/O ABDUL RAZAQ	DIKHAN	STATISTICS	GGHSS KULACHI (DIK)

Attest
Kamranullah
Advocate
Kohat

	SHAMSHAD BEGUM D/O SHAH DARAZ KHAN	DIKHAN	STATISTICS	GGHSS CHAH SYED MUNAWAR SHAH NO.6 (DIK)
183.	MEHWISH MUNSIF D/O MUNSIF KHAN	HARIPUR	STATISTICS	GGHSS KHANPUR (HARIPUR)
184.	ANEELA ASHRAF D/O MOHD ASHRAF	DIKHAN	STATISTICS	GGHSS SHAKARDARA KOHAT
185.	RAKSHINDA FALAK D/O FALAK SHER	DIKHAN	STATISTICS	GGHSS TITTER KHEL (LAKKI)
186.	ANEELA KAUSAR D/O FAZAL RAUF	MARDAN	STATISTICS	GGHSS TAKHT BHAI (MARDAN)
187.	KHUDIJA BIBI D/O FARIDULLAH		STATISTICS	GGHSS D ISMAIL KHEL (NSR)
188.	BUSHRA ASHRAF D/O	ABBOTTABAD	STATISTICS	GGHSS KALO KHAN (SWABI)
189.	SAIMA SABIR D/O SABIR SHAH	SWABI	STATISTICS	GGHSS TOPI (SWABI)
190.	FARZANA D/O IHSANULLAH	SWAT	STATISTICS	GGHSS MATTA (SWAT)
191.	SHEHNAZ AKHTAR D/O HAJI NAZIR AHMAD	ABBOTTABAD	URDU	GGHSS HAJIA GALI ABBOTTABAD
192.	MEHPARA D/O ABDUL QAYUM KHAN	DIKHAN	URDU	GGHSS S.K. BALA (BANNU)
193.	ROBINA BEGUM D/O KIFAYATULLAH	PESHAWAR	URDU	GGHSS SHABQADAR (CHARSADDA)
194.	GUL AFSHAN D/O KHAN BADSHAH	DIR LOWER	URDU	GGHSS CHAKDARA (DIR LOWER)
195.	ZAINAB D/O FAZAL WAHID	MALAKAND	URDU	GGHSS OCH (DIR LOWER)
196.	OMI KALSOOM D/O GUL ZAREEN	MALAKAND	URDU	GGHSS TIMERGERA (DIR LOWER)
197.	NABILA SHAMS D/O SHAMSUR REHMAN	SWAT	URDU	GGHSS ZIARAT TALASH DIR (L)
198.	FARIDA D/O KHAN ZADA	KOHAT	URDU	GGHSS BILI TANG KOHAT
199.	RASHIDA BEGUM D/O KHANZADA	KARAK	URDU	GGHSS LACHI KOHAT
200.	FARZANA KALSOOM D/O KHAN WALI	KARAK	URDU	GGHSS TERI (KARAK)
201.	SHAZIA RANI D/O FAZLE MOHD	MARDAN	URDU	GGHSS SHAHDAND (MARDAN)
202.	LUBNA ALI D/O SHOAKAT ALI	MARDAN	URDU	GGHSS HATHIYAN (MARDAN)
203.	NIGAT BIBI D/O SULTAN SAID	MARDAN	URDU	GGHSS RUSTAM (MARDAN)
204.	SOFIA SULTAN D/O SULTAN MOHD	ABBOTTABAD	URDU	GGHSS OGHAI (MANSEHRA)
205.	UZMA D/O MOHD ZAMEEN	MALAKAND	URDU	GGHSS TOPI (SWABI)
206.	NASREEN WAZIR D/O GHANI UR REHMAN	FR BANNU	URDU	At the disposal of Director FATA Education for further posting
207.	ISMAT BEGUM D/O ARSALA KHAN	PESHAWAR	URDU	At the disposal of Director FATA Education for further posting
208.	RAHEELA NOREEN D/O ABDUL MAJID	TANK	URDU	At the disposal of Director FATA Education for further posting

TERMS & CONDITIONS.

1. Their services will be considered as regular but without pension & gratuity in terms of Section-19 of the NWFP, Civil Servants Act, 1973 as amended vide NWFP, Civil Servants (Amendment) Act 2005. They will, however, be entitled to contributory Provident Fund in such a manner and at such rates as prescribed by the Government.

Atterki
Kalmitah
 Advocate & Legal Counsellor
 Abbottabad

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2. Their terms & conditions of service shall be governed under the NWFP Civil Servant Act 1973 and the rules made there under except seniority.
3. Their services will be liable to termination on the basis of the NWFP Employees (Regularization of Services) Act, 2009.
4. Their seniority will be determined according to Section-4 of the NWFP, Employees (Regularization of Services) Act, 2009.
5. They should join their post within 30-days of the issue of this notification and they will be required to furnish copies of all their certificates/degrees alongwith original receipts and photo stat copies thereof, pertaining to the verification fee of the concerned Examining body (Board & University) to this Department as well as to the EDOs (E&SE) concerned.
6. They would be on probation for a period of two years extendable for another one year.
7. They will be governed by such rules and regulations as may be issued from time to time by the Government.
8. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Power) Ordinance, 2000 and the Rules framed from time to time.
9. They are junior to those selectees who have been appointed by Government on the recommendations of Khyber Pakhtunkhwa Public Service Commission.
10. Charge report should be submitted to all concerned.
11. The EDO (E&SE) concerned is directed not to release their pay until the verification of their documents.
12. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY TO GOVT. OF KHHYBER PAKHTUNKHWA,
ELEMENTARY & SECONDARY EDUCATION DEPTT.

Endst. No. & Date even:

Copy of the above is forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Directress, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Director Information, Khyber Pakhtunkhwa, Peshawar.
4. Director Education FATA, Khyber Pakhtunkhwa, Peshawar.
5. District/ Agency Accounts Officers concerned.
6. Executive District Officers, (E&SE) in Khyber Pakhtunkhwa.
7. PS to Minister (E&SE), Khyber Pakhtunkhwa, Peshawar.
8. PS to Secretary Govt: of Khyber Pakhtunkhwa, (E&SE) Department.
9. PS to Additional Secretary Govt: of Khyber Pakhtunkhwa, (E&SE) Department.
10. All Subject Specialists concerned.
11. Office orders file

(FARID AHMAD KHATRAKI)
SECTION OFFICER (GENERAL)

Attested
Abdulmullah
Advocate District Court
Peshawar

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Government of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department

No. SOG/E&SE/1-85/2010
Dated Peshawar the 10/03/2011

To

The District Comptroller of Accounts,
Abbottabad.

Subject: - REGULARIZATION OF SUBJECT SPECIALIST (BPS-17) AND
SECONDARY SCHOOL TEACHERS (BPS-16).

Memo:

Please refer to your letter No. PR-II/DCA-ATD/462-467 dated 26/02/2011 addressed to Accountant General Khyber Pakhtunkhwa and copies inter alia endorsed to this Department on the subject noted above.

2. N.W.F.P Employees (Regularization of Services) Ordinance, 2009 was promulgated on 24th September, 2009. It was then laid before the Provincial Assembly and enacted as an Act, called N.W.F.P. Employees (Regularization of Services) Act, 2009.

3. Sub-section (2) of Section-I of the Act is reproduced as under: -

"It shall come into force at once and shall be deemed to have taken effect from promulgation of the Ordinance." It means that the Act has been given effect from 24th September, 2009 which is the date of promulgation of the Ordinance. Though Section-5 of the Act, 2009 repealed the Ordinance but it has not in any way harmed sub-section-2 of Section-I thereof. In other words the Act has been given effect from the date of promulgation of the Ordinance which is 24th September, 2009.


4. Section-3 of the Regularization Act, 2009 also provides that all employees including recommendees of the High Court appointed on contract basis and holding that post on 31-12-2008 or till the commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post.

Attested

Kamilullah
Advocate District Courts
Abbottabad

5. It is obvious from Section-3 of this Act that all the contract employees i.e. Subject Specialists and Senior School Teachers in E&SE Department whose expiry of contractual appointment period was much beyond 31-12-2008, remained no more contract employees, therefore there was no need to extend their contract period any more, but they were to be regularized w.e.f 24-09-2009 in the light of above provisions of law.

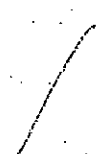
6. This Department has made regularization of these employees in consultation of Establishment & Administration Department as well as Law, Parliamentary Affairs and Human Rights Department in the light of Rules of Business, 1985.

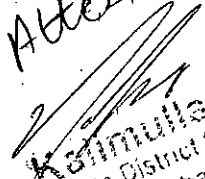

(Farid Ahmad Khattak)
Section Officer (General)

Endst. No. & date even.

A Copy w/r to District Comptroller of Accounts Abbottabad is forwarded for information to: -

- 1- The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- The Directress, E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3- Mr. Muhammad Qasim, Section Officer (R-I), Establishment Department, Govt. of Khyber Pakhtunkhwa, Peshawar w/r to your letter No. SOR-1(E&AD)7-5-03-VOL-I dated 12.10.2010.
- 4- Mr. Wazir Muhammad Aagar, Section Officer (FR), Finance Department, Govt. of Khyber Pakhtunkhwa, Peshawar w/r to your letter No. SO (FR)FD/10-22/2009-10 dated 30.08.2010.
- 5- The Executive District Officer, E&SE Abbottabad.
- 6- P.S to Secretary, E&SE Department.
- 7-


Section Officer (General)

Attested

Kamulish
Advocate District Courts
Abbottabad

Annex "C"

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Government of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department

Dated Peshawar the 24/01/2011

NOTIFICATION.

No. SOG(E&SE)1-85/2010/SS/Regular. The competent authority is pleased to adjust the following (Male/Female) Subject Specialists of various subjects against the vacant posts of Subject Specialists as under with effect from 24/09/2009 to 31/05/2010 for the purpose of pay only:-

S.#	Name of the officer	Present posting	Post against which the officer adjusted for the purpose of pay	Remarks
1	Mst. Seema	Subject Specialist, English (BS-17), GGHSS Ouch Da Lower	Subject Specialist, English (BS-17), GGHSS Ouch Dir Lower	Against the vacant post w.e.f 24/09/2009 to 25/06/2010.
2	Zubair Ali Khan	Subject Specialist, Chemistry (BS-17), GHSS Likpani, Mardan	Subject Specialist, Chemistry (BS-17), GHSS Likpani, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
3	Muhammad Ismail	Subject Specialist, Statistics (BS-17), GHSS Palo Dheri, Mardan	Subject Specialist, Statistics (BS-17), GHSS Palo Dheri, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
4	Ijaz	Subject Specialist, H/Civics (BS-17), GHSS Shahbaz Ghari, Mardan	Subject Specialist, H/Civics (BS-17), GHSS Shahbaz Ghari, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
5	Haider Ali	Subject Specialist, Biology (BS-17), GHSS Pir Sadi, Mardan	Subject Specialist, Biology (BS-17), GHSS Pir Sadi, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
6	Murad Khan	Subject Specialist, H/Civics (BS-17), GHSS Gujar Ghari, Mardan	Subject Specialist, H/Civics (BS-17), GHSS Gujar Ghari, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
7	Umar Farooq	Subject Specialist, Statistics (BS-17), GHSS Likpani, Mardan	Subject Specialist, Statistics (BS-17), GHSS Likpani, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
8	Mukamil Shah	Subject Specialist, Pak-Studies (BS-17), GHSS No. 1, Mardan	Subject Specialist, Pak-Studies (BS-17), GHSS No. 1, Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.

Attended

[Signature]
Revenue District Officer
Abbottabad

Attended
[Signature]

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9	Fazl-e-Mula	Subject Specialist. Chemistry (BS-17). GHSS Palo Dheri. Mardan	Subject Specialist. Chemistry (BS-17). GHSS Palo Dheri. Mardan	Against the vacant post w.e.f 24/09/2009 to 30/05/2010.
10	Umber Rabail	Subject Specialist. Maths (BS-17). GGHSS Teri. Karak	Subject Specialist. Maths (BS-17). GGHSS Teri. Karak	Against the vacant post w.e.f 24/09/2009 to 30/08/2010.
11	Nazaneen Yousaf	Subject Specialist. Biology (BS-17). GGHSS Luqman Khel. Kurram	Subject Specialist. Biology (BS-17). GGHSS Luqman Khel. Kurram	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
12	Muhammad Shakoor	Subject Specialist. Physics (BS-17). GHSS Chorlaki. Kohat	Subject Specialist. Physics (BS-17). GHSS Chorlaki. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
13	Rasool Muhammad	Subject Specialist. Chemistry (BS-17). GHSS Chorlaki. Kohat	Subject Specialist. Chemistry (BS-17). GHSS Chorlaki. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
14	Hidayat Ullah	Subject Specialist. Islamiyat (BS-17). GHSS Chorlaki. Kohat	Subject Specialist. Islamiyat (BS-17). GHSS Chorlaki. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
15	Muhammad Sajjad	Subject Specialist. Maths (BS-17). GHSS Chorlaki. Kohat	Subject Specialist. Maths (BS-17). GHSS Chorlaki. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
16	Muhtadullah	Subject Specialist. Islamiyat (BS-17). GHSS Gumbat. Kohat	Subject Specialist. Islamiyat (BS-17). GHSS Gumbat. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
17	Arshad Aziz	Subject Specialist. Statistics (BS-17). GHSS Chorlaki. Kohat	Subject Specialist. Statistics (BS-17). GHSS Chorlaki. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
18	Khan Zeb	Subject Specialist. Statistics (BS-17). GHSS Palo Dheri. Mardan	Subject Specialist. Statistics (BS-17). GHSS Palo Dheri. Mardan	Against the vacant post w.e.f 24/09/2009 to 22/08/2010.
19	Jamal-ud-Din	Subject Specialist. Biology (BS-17). GHSS Landi Kachai. Kohat	Subject Specialist. Biology (BS-17). GHSS Landi Kachai. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
20	Muhammad Zahir Khan	Subject Specialist. Chemistry (BS-17). GHSS Landi Kachai. Kohat	Subject Specialist. Chemistry (BS-17). GHSS Landi Kachai. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
21	Siraj-ud-Din	Subject Specialist. Urdu (BS-17). GHSS Landi Kachai. Kohat	Subject Specialist. Urdu (BS-17). GHSS Landi Kachai. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
22	Mir Zali Khan	Subject Specialist. English (BS-17). GHSS Lachi Kohat	Subject Specialist. English (BS-17). GHSS Lachi Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.

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Attested
 Director
 Board of Intermediate and Secondary Education
 Mardan

23	Niamat Bibi	Subject Specialist. Chemistry (BS-17). GGHSS Billitang. Kohat	Subject Specialist. Chemistry (BS-17). GGHSS Billitang. Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
24	Javeria Asghar	Subject Specialist. Pak Study (BS-17). GGHSS Bandi Munceem Haripur	Subject Specialist. Pak Study (BS-17). GGHSS Bandi Munceem Haripur	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
25	Hasina	Subject Specialist. Pak Study (BS-17). GGHSS Baja Swabi	Subject Specialist. Islamiyat (BS-17). GGHSS Kalabat. Swabi	Against the vacant post w.e.f 12/12/2009 to 30/06/2010.
26	Gul Meena	Subject Specialist. History-cum-Civics (BS-17). GGHSS Shahbaz Garhi. Mardan	Subject Specialist. History-cum-Civics (BS-17). GGHSS Shahbaz Garhi. Mardan	Against the vacant post w.e.f 24/09/2009 to 31/06/2010.
27	Miss Naila Begum	Subject Specialist. Economics (BS-17). GGHSS Hathiyan. Mardan	Subject Specialist. Economics (BS-17). GGHSS Hathiyan. Mardan	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
28	Miss Jamila Aziz	Subject Specialist. Islamiyat (BS-17). GGHSS Katlang. Mardan	Subject Specialist. Islamiyat (BS-17). GGHSS Katlang. Mardan	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
29	Miss Shabana Naz	Subject Specialist Biology (BS-17). GGHSS Shahbaz Garhi Mardan	Subject Specialist Biology (BS-17). GGHSS Shahbaz Garhi Mardan	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
30	Syed Saad-ud- Din	Subject Specialist Islamiyat (BS-17). GGHSS Dhand Saghri Kohat	Subject Specialist Islamiyat (BS-17). GGHSS Dhand Saghri Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
31	Bibi Maryam	Subject Specialist (Physics) (BS-17). GGHSS Lachi Kohat	Subject Specialist (Physics) (BS-17). GGHSS Lachi Kohat	Against the vacant post w.e.f 29/06/2009 to 31/05/2010.
32	Sania Aman	Subject Specialist (Pak Study) (BS-17). GGHSS Gumbat Kohat	Subject Specialist (Pak Study) (BS-17). GGHSS Gumbat Kohat	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
33	Nida Bibi	Subject Specialist (Pak Study) (BS-17). GGHSS Mathra Peshawar	Subject Specialist (Pak Study) (BS-17). GGHSS Mathra Peshawar	Against the vacant post w.e.f 24/09/2009 to 28/06/2010.
34	Aneela Kausar	Subject Specialist (Statistics) (BS-17). GGHSS Takht Bhai Mardan	Subject Specialist (Statistics) (BS-17). GGHSS Takht Bhai Mardan	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
35	Sobia Bano	Subject Specialist (English) (BS-17). GGHSS Khair Abad Nowshera	Subject Specialist (English) (BS-17). GGHSS Khair Abad Nowshera	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.

Attested
Kalimullah
Advocate District Courts
Abbottabad

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35	Amliat Yasmeen	Subject Specialist History Com Civics (BS-17) GGHSS Hathain Distt Mardan.	Subject Specialist History Com Civics (BS-17) GGHSS Hathain Distt Mardan.	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
37	Arif Hammed	Subject Specialist Economics (BS-17) GHSS Mardan	Subject Specialist Economics (BS-17) GHSS Mardan.	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
38	Rashida Begum	Subject Specialist Urdu (BS-17) GGHSS Lachi Kohat	Subject Specialist Urdu (BS-17) GGHSS Lachi Kohat	Against the vacant post w.e.f 16/09/2009 to 01/06/2010.
39	Shumaila Farid	Subject Specialist History-cum-Civics (BS-17) GGHSS Lora Abbottabad	Subject Specialist History-cum-Civics (BS-17) GGHSS Lora Abbottabad	Against the vacant post w.e.f 24/09/2009 to 31/05/2010.
40	Munsif Khan	Subject Specialist (State) (BS-17) GHSS Ghani Dherai Malakand	Subject Specialist (State) (BS-17) GHSS Ghani Dherai Malakand	Against the vacant post w.e.f 24/09/2009 to 15/06/2010.

2. No. T.A/D.A is allowed.

Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education
Department.

Encls: No. & date even.

Copy forwarded to:-

1. The Directress, E&SE, Khyber Pakhtunkhwa Peshawar.
2. All concerned EDOs, E&SE.
3. All concerned District Accounts Officers.
4. The concerned Principals, GGHSS/GHSS of the District.
5. PS to Secretary, E&SE Department.

Secretary (General)

Attested
Munir
Advocate District Court
Abbottabad

K.T.S

11/10/09



PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

P-28

OFFICE OF THE : G.G.H.S.S. Sirikote Haripur

FOR THE MONTH OF : 6/2010

EDO Code : HR6107 Description : G.G.H.S.S. Sirikote

Personnel Number : 00392551 Employee Name : Rabia Bibi

Grade (Pay Scale Group) : 17 S.S., History/Civics

National ID Card Number : 61101-5665818-2

Handwritten notes: w/sh, 23/06/2010, 23/6/10

GENERAL DATA SERVICES		CHARGE / PAYMENT / DEDUCTIONS				Effective Date	Remarks
Item No	Part ID	Name Contents	Wage Type	Amount			
		Basic pay	0001	0590			
		House Rent	1000	2955		01-06-2010	Corrigendum NO: SO (ERSE) 1-85/2010/SS/Reguly
		Adhoc Relief Allow.	1909	1538			Dated 31-05-2010 vide No SO (G) E&S 11-85/2009
		G.I.	3409	236			SI/connected Dated 31-05-2010
		Edu. foundation	3640	30			
		C.P.F	3117	1249			
		B.F	3501	75			
		Adol. G.I.	3571	25			
		Adj Basic pay	580	85538		Adjustment w.e.f 24-09-09	
		Adj House Rent	5002	24330		7031-05-2010	
		Adj Adhoc Relief Allow.	5884	12827			
		Adj G.I.		2040			
		Adj Edu. foundation		240			
		Adj C.P.F		9992			
		Adj B.F		600			
		Adj G.I.		200			

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2010
PRINCIPAL
Govt. Girls Higher Secondary School
Sirikot (Haripur)

Handwritten signature and stamp: M. A. H. Khan, Govt. Girls Higher Secondary School, Sirikot (Haripur)

Annex "E"

P-29

To,

The Director
Elementary & Secondary Education,
KPK, Peshawar.

Subject: PAYMENT OF SALARY TO THE APPELLANT W.E.F
24/09/2010 TO 31/05/2010.

Sir,

1. That the appellant got appointment as Subject Specialist (Statistics) on contract basis on 26/12/2008. Copy of appointment order is annexed herewith.
2. That Govt. of KPK Announced KPK Employees (Regularization of Services Act, 2009) for regularization of contract employees. As a result, the appellant services have been regularized at serial No 193 of regularization Notification No.SO(G)E&S/1-85/2009/SS/Contract dated 31/05/2010. It is further submitted that services of the appellant has been regularized on 24/09/2009. Copy of regularization order dated 31/05/2010 is attached herewith.
3. That once services of appellant has been regularized on 24/09/2009, the appellant is entitled to receive salary of the period w.e.f 24/09/2009 to 31/05/2010. The department has paid payment of salary on regular basis w.e.f 31/05/2010 instead of 24/09/2009 onwards.
4. That it is worth to mention here that similar S.S whose services were regularized alongwith the appellant they have been paid payment of salary on regular basis w.e.f

Attested

Advocate District Court
Peshawar

24/09/2009 which is discriminatory against the regularization notification.

In view the above it is prayed that salary w.e.f 24/09/2009 to 31/05/2010 may graciously be paid to the appellant.

Yours Sincerely

Dated: _____/2018

MEHWISH MUNSIF
S.S (Statistics)

G.G.H.S.S Keeri Raiki Atd.
27/7/2018

Attested

Kallimullah
Advocate District Courts
Abbottabad

31

وکالت نامہ

کورٹ فیس

بعدالت سروس لٹریچر ڈپارٹمنٹ ضلع کٹوا کھوہ لاہور
عنوان: مہوش منیر بیم قدرمنٹ ICPK لاہور اور مستر

منجانب: Appellant

نوعیت مقدمہ: Service Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی نکل کارروائی متعلقہ آن مقام

میسز ایچ ڈی وائیٹ مائن کورٹس اینڈ آفیس لاہور اور میسز ایچ ڈی وائیٹ مائن کورٹس اینڈ آفیس لاہور

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی نکل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر فائنٹ فیصلہ بر حلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی نکل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مفاد صاحب مالونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داخہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو فرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بتایا تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مفاد مقرر کردہ میں کوئی جزو بھایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بیخہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم: مہوش منیر
Accepted

بمقام: ایبٹ آباد
Accepted
By ...

المستعمل ...

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مہوش منیر

Before the Service Tribunal Khyber Pakhtunkhwa Peshawar
Abbottabad Bench

Service appeal no.1403 /2018

Mehwish Munsif Subject Specialist (Statistic) (BPS-17) GGHSS Keri Raiki.

Appellant

VERSUS

District Education Office (F) Haripur

RESPONDENT

INDEX

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2	Affidavit		3
3	Copy of 2003 SCMR 228	A	4-5

Respondent No 5

Through


District Education Officer (F)
Haripur

Before the Service Tribunal Khyber Pakhtunkhwa
Peshawar Abbottabad Bench

Service appeal no.1403 /2018

Mehwish Munsif Subject Specialist (Statistic) (BPS-17) GGHSS Keri Raiki.

Appellant

VERSUS

District Education Office (F) Haripur

RESPONDENT

RESPECTFULLY SHEWETH:-

Reply facts / Grounds

1. That the appellant has no cause of action nor locus standee to file the instant appeal.
2. That the appellant has not come to this Honorable Court with clean hands.
3. That the appellant is against the prevailing law and rules.
4. That the appellant has concealed the material facts from this honorable Court, hence liable to be dismissed.
5. That the appellant has filed the instant petition on malafide motives.
6. That the appellant has filed the instant petition just to pressurize the respondent no 3.
7. That the instant appeal is not maintainable in the present form and also in the present circumstances of the issue.

Para wise reply/ comments on facts are as under

1. Para no 1 is correct and need no comments.
2. Para no 2 is correct that the Govt, of KPK announced KPK Employees Regularization of Service Act, 2009.
3. Para no 3 is incorrect the appellant is not entitled to receive salary of period w.e.f 24/09/2009 to 31/05/2010, because she did not perform any duty in this period, she did not attached any attested documents of her duty. She deliberately remained absent from the school. In the light of 2003 SCMR 228 (Supreme Court of Pakistan) Syed Niaz Hussain Shah Bukhari versus OIL/And Gas Development Corporation Limited through Chairman, OGDC Head Office Islamabad. "When there is no work, there is no pay." (Copy 2003 SCMR 228 annexure A page 4-5).
4. Para no 4 is incorrect and already explain in para no 3, hence need no comments.
5. Para no 5 is incorrect because others subjects specialist may perform their duties and appellant did not perform any duty from (24/09/2009 to 31/05/2010) and

how concern Principal can signed their salary bill without any prove . If appellat have any certificate of duty, she is deserve salary of said period.

6. That the appellat has no right for demand of salary, hence need no comments.

Para Wise Reply of Grounds:-

- a) Ground is incorrect, the conduct of respondents is not discriminatory towards the appellat.
- b) Ground is incorrect, the appellat did not server the department from (24/09/2009 to 31/05/2010).
- c) Ground is incorrect and need no comments.
- d) Ground is incorrect and need no comments.
- f) Ground need no comments.

Prayer:

It is therefore, humbly prayed that the instant service appeal dismissed with cost.

Respondent no.5


District Education Officer (F)
Haripur

Before the Service Tribunal Khyber Pakhtunkhwa Peshawar
Abbottabad Bench

Service appeal no.1403 /2018

Mehwish Munsif Subject Specialist (Statistic) (BPS-17) GGHSS Keri Raiki.

Appellant

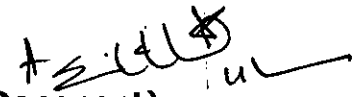
VERSUS

District Education Office (F) Haripur

RESPONDENT

AFFIDAVIT

I Ahmed Sultan khan ADEO O/O DEO (F) Haripur is hereby solemnly affirm and declare that contents of accompany para wise reply to the service appeal 1403/2018 filed by the respondent are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court.


(Deponent)

parties and have also perused the record of the case. It may be pointed out that under the Rules, the said items are liable to duty tax/royalty and for such purpose publication was made under the Rules and in open auction petitioner being highest bidder was given contract and there is nothing on record to show that any Government department is exempted from tax/duty; thus the contention of Syed Ayyaz Zahoor, Advocate for the petitioners has substance. Admittedly the petitioners are extracting Bajri, sand stone crush from Hub River and other parts of District Lasbela which is liable to payment of royalty, therefore, petition is allowed as prayed for. Respondent to pay tax in future and also to pay arrears i.e. w.e.f. 24-2-2001 on the material already extracted by them.

(6) Petition is allowed in the above terms with no order as to costs.

The impugned judgment is not open to exception, as it is well reasoned and based on the law. There is no material irregularity or illegality.

8. For the facts and reasons stated hereinabove, were are of the considered view, that this petition is without merit and substance, which is hereby dismissed and leave to appeal declined.

Q.M.H./M.A.K./C-64/S

2003 S C M R 228

[Supreme Court of Pakistan]

Present: Syed Deedar Hussain Shah
and Tanvir Ahmed Khan, JJ

Syed NIAZ HUSSAIN SHAH BUKHARI, TECHNICIAN
(PROCESS)—Petitioner

versus

OIL AND GAS DEVELOPMENT CORPORATION LIMITED through
Chairman, OGD Head Office, Islamabad—Respondent

Civil Petition For Leave to Appeal No.51 of 2002, decided on 11th
September, 2002.

(On appeal from judgment dated 2-11-2001 passed by the Federal
Service Tribunal, Islamabad, in Appeal No.1076(R)CE of 2000)

SCMR

(a) Civil service—

---Pay, entitlement to—When there is no work, there is in no pay.
[p. 231] C

(b) Civil service—

---Salary, refund of—Civil servant after obtaining stay order against his transfer was allowed to continue his duties at original place, where he was paid salary for about three years.—Authority deducted from salary of civil servant the amount paid to him as salary for the period when he remained absent from duty—Service Tribunal dismissed appeal of civil servant—Validity—Civil servant had not performed his duties either at original place or at transferred place, thus, was not entitled to salary—Period for which refund of salary was effected from civil servant was the period for which, he had not worked—When there was no work, there was no pay—Recovery had rightly been effected from civil servant—Impugned judgment was not open to exception as there was no jurisdictional error or misconstruction of facts and law—No substantial question of law of public importance as envisaged under Art. 212(3) of the Constitution was made out—Supreme Court dismissed petition for leave to appeal in circumstances—Constitution of Pakistan (1973), Art. 212(3). [pp. 230, 231] A, B, C, D, E & F

Sadiq Muhammad Warraich, Advocate Supreme Court and Ejaz
Muhammad Khan, Advocate-on-Record (absent) for Petitioner.

Sardar Muhammad Aslam, Dy. A.G. and M.S. Khattak, Advocate-
on-Record for Respondent.

Date of hearing: 11th September, 2002.

JUDGMENT

SYED DEEDAR HUSSAIN SHAH, J.—Petitioner seeks leave to appeal against that judgment of the Federal Service Tribunal, Islamabad (hereinafter referred to as the Tribunal) passed in Appeal No.1076(R)CE of 2000 dated 2-11-2001, whereby appeal filed by the petitioner was dismissed.

2. Briefly stated that facts of the case are that on 4-7-1994, the petitioner was transferred from Missa Kiswal to Peer Koh. He felt that transfer order so issued was mala fide and he was punished being the Union Official of the respondent/Corporation, therefore, he approached the NIRC for restraining the order under Regulation 32 of NIRC Procedure and Functions and Regulations, 1974 and a stay order against his transfer to Peer Koh was granted and he was allowed to continue and perform his duties at Missa Kiswal and also paid his salary that after about 3 years the respondent started deductions from the salary of the petitioner i.e. the amount which had

SCMR

page (4)

been paid to him as salary, during the period he worked at Missa Kiswal on the strength of the stay order of NIRC.

3. Feeling aggrieved, the petitioner approached the Tribunal by way of appeal, which was dismissed. Hence, this petition.

4. We have heard Ch. Sadiq Mohammad Warriach, learned counsel for the petitioner, who, inter alia, contended that that petitioner's absence from duty from 2-7-1994 to 8-8-1994 and 5-10-1994 to 10-9-1996 was wrongly treated as Extra Ordinary Leave (EOL) and the Office Memorandum dated 13-2-1999 issued by the respondent/Head Office may be cancelled; that the Tribunal had not exercised its jurisdiction fairly and the recovery/deduction of the amount already drawn by the petitioner from the respondent is unwarranted.

5. Sardar Muhammad Aslam, learned Dy.A.G. vehemently controverted the contention of the learned counsel for the petitioner and pointed out that no doubt NIRC issued an injunction to the petitioner but the same was re-called by the Tribunal on 18-8-1996. He has also referred to the appeal of the petitioner which is at page 57 of the paper book, in which he has stated as under:

"I had reported for duty at Pirkoh Gas Field. Therefore, regularizing the period of stay, ordered by the Court as E.O.L. is injustice with me."

On his application office submitted summary to the Chief Personnel Officer of the respondent/Corporation, which reads as under:

"(70) Reference para-180/N, it is submitted that as per message No.MK.1331 dated 26-11-1999 (P-244/Cor.) O.M.(F), Missa Kiswal, Mr. Niaz Hussain Shah was relieved from Missa Kiswal Oil Field, for Pirkoh Gas Field. He neither reported at Pirkoh nor at Missa Kiswal Oil Field, after getting stay order from NIRC O.M.(F), Missa Kiswal Oil Field, did not confirm whether he performed any official duty during his stay (off & on) at Missa Kiswal. Mr. Niaz Hussain neither claimed any field benefit like messing/D.A. and Rota facilities nor paid by the Location Incharge due to his non-performance of any duty.

"(71) In view of above, if approved by Manager (Personnel), his request may be regretted in the light of earlier decision as per para.141 please."

The perusal of the above document shows that the petitioner did not perform his usual duties and was not entitled to salary as claimed by him.

6. Sardar Muhammad Aslam, learned Dy.A.G. further pointed out that

recovery has already been effected from the petitioner and that Office Memorandum referred to hereinabove was entirely in accordance with the O.G.D.C. Service Regulations, 1974. It was also pointed out by him that the petitioner in due course of service has already been promoted to his Managerial post.

7. We have considered the arguments of the learned counsel for the parties and have carefully examined the record, which shows that the period for which recovery of refund of the salary was effected from the petitioner was the period for which he did not work. By now, it is settled law that when there is no work there is no pay. The petitioner did not perform his duties as mentioned hereinabove and recovery was rightly effected from him; thereafter, he was promoted to the post of Manager. The impugned judgment is entirely based on proper appreciation of the material available with the Tribunal. We further find that there is no jurisdictional error or misconstruction of facts and law. The impugned judgment is not open to exception.

8. Moreover, a substantial question of law of public importance, as envisaged under Article 212(3) of the Constitution, is not made out.

9. For the facts, circumstances and reasons stated hereinabove, we are of the considered opinion that this petition is without merit and substance, which is hereby dismissed and leave to appeal declined.

S.A.K./N-100/S

Petition dismissed.

2003 S C M R 231

[Supreme Court of Pakistan]

Present: Qazi Muhammad Farooq, Rana Bhagwandas
and Abdul Hameed Dogar, JJ

MUHAMMAD YASEEN---Appellant

versus

THE STATE---Respondent

Criminal Appeal No.109 of 2002, decided on 19th September, 2002.

(On appeal from the judgment dated 31-5-2002 of the Lahore High Court, Lahore, passed in Criminal Appeal No.207 of 1996 and Murder Reference No.134 of 1996).

page # 25

CERTIFICATE OF TRANSFER OF CHARGE

1-6-2010 F III

1. Certified that we on fore/after noon on that day respectively made over And receive charge of this office of the S/S state post at Govt Girls Higher Secondary School Khanpur.
2. Particular of cash and important secret and confidential documents handed over our noted on the reverse.

Station:Khanpur

Signature of relieving
Govt servant. vacant Post
Designation S/S

Mehvish


Signature of receiving charge
Govt servant. Miss Mehvish Munsif
Designation S/S state

Dated: 1/6/2010

Ends: no 6641-431 Dated Khanpur the 7-6-2010

Copy of the above is submitted for information necessary action to the,

- 1.
2. Executive District Officer (E&S) Education Haripur.
3. District Account Officer Haripur.
4. Local Office.
5. Officer Concerned.


PRINCIPAL
GGHSS KHANPUR
G.G.H.S.S Khanpur

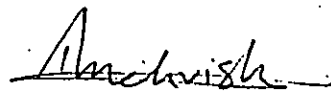
ARRIVAL REPORT

Consequent upon my appointment as Subject Specialist (S.S.) of Statistics vide Secretary to Govt. of NWFP S&L Department modification, issued under Endst No.SO(G)/ESE/1-85/2008 SS (Contract) dated 26/12/2008, I do hereby submit my arrival report at GGHSS KHANPUR today on 31st of December 2008 (Forenoon).

It is therefore requested that my arrival report may kindly be accepted and obliged.

Date: 31-12-2008.

Yours obediently,



Mehvish Munsif

D/O

Munsif Khan

Subject Specialist Statistics

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SE DEPARTMENT**

Dated Peshawar the, March 27, 2012

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2013/Mehvish Munsif & Saima Nazli. Posting/Transfer order of Mst. Mehvish Munsif & Mst. Saima Nazli issued vide this department notification of even number dated 20.11.2012 is hereby cancelled with immediate effect.

2. Consequent upon the above the posting positions of the subject Specialists are as under.

S. No	Name, Designation & place of posting	To	Remarks
1.	Mst. Mehvish Munsif Subject Specialist Statistics (BS-17) GGHS Khanpur, Haripur.	As Subject Specialist Statistics (BS-17) GGHS Havelian, Abbottabad.	
2.	Mst. Saima Nazli Subject Specialist Statistics (BS-17) GGHS Havelian, Abbottabad.	As Subject Specialist Statistics BS-17 GGHS Khanpur, Haripur.	

3. No TA / DA are allowed.

SECRETARY

Endst. of even No & date

Copy forwarded to :-

1. Accountant General, Khyber Pakhtunkhwa Peshawar
2. Director, E&SE, Peshawar.
3. District Education Officer (F), Abbottabad & Haripur
4. District Accounts Officer Abbottabad & Haripur
5. Incharge EMIS, E&SE Department.
6. P.S to Secretary E&SE Department.
7. Officer concerned.
8. Office order file.

(MEHVISH MUNSIF)
SECTION OFFICER

ARRIVAL REPORT

Consequent upon my appointment as Subject Specialist (S.S.) of Statistics vide Secretary to Govt. of NWFP S&L Department modification, issued under Endst No.SO(G)/ESE/1-85/2008 SS (Contract) dated 26/12/2008, I do hereby submit my arrival report at GGHS KHANPUR today on 31st of December 2008 (Forenoon).

It is therefore requested that my arrival report may kindly be accepted and obliged.

Date: 31-12-2008.

Yours obediently,



Mehvish Munsif

D/O

Munsif Khan

Subject Specialist Statistics

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SE DEPARTMENT**

Dated Peshawar the, March 20, 2013

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2013/Mehvish Munsif & Saima Nazli. Posting/Transfer order of Mst. Mehvish Munsif & Mst. Saima Nazli issued vide this department notification of even number dated 20-11-2012 is hereby cancelled with immediate effect.

2. Consequent upon the above the posting positions of the Subject Specialist are as under.

S. No	Name, Designation & place of posting	To	Remarks
1.	Mst. Mehvish Munsif Subject Specialist Statistics (BS-17) GGHS Khanpur, Haripur.	As Subject Specialist Statistics (BS-17) GGHS Havelian, Abbottabad.	
2.	Mst. Saima Nazli Subject Specialist Statistics (BS-17) GGHS Havelian, Abbottabad.	As Subject Specialist Statistics BS-17 GGHS Khanpur, Haripur.	

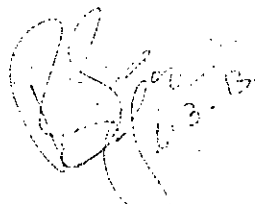
3. No TA / DA are allowed.

SECRETAR

Indist. of even No & date

Copy forwarded to :-

1. Accountant General, Khyber Pakhtunkhwa Peshawar
2. Director, E&SE, Peshawar.
3. District Education Officer (F), Abbottabad & Haripur
4. District Accounts Officer Abbottabad & Haripur.
5. Incharge EMIS, E&SE Department.
6. P.S to Secretary, E&SE Department.
7. Officer concerned.
8. Office order file.


 (OFFICINE HEAD) SECTION OFFICER

2010

بابت ماہ جون

ردیف	مذکورہ مقام	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون	بابت ماہ جون
1	Regularization										
2											
3											
4											
5	Holiday										
6	Sunday										
7											
8											
9											
10											
11											
12	Holiday										
13	Sunday										
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S. S. State

حاصل شدہ	۱	۴	۵	—	—	—	—	—	—	—	—	—	—
بقایا													
مجموعہ													

دستخط مہتمم

of the month of May 2009

OF ATTENDANCE

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-3	(3)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-8	(8)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	1-6	(7)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-12	(12)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-8	(8)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-12	(12)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-13	(13)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-7	(7)	
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	0-8	(8)	
17/11/09 Dr. Anwar																					
16/05/09																					
10/10/19																					

~~Principal~~
G. S. Khanpur
10/10/19

(10/10/19)

Daily Attendance Register of the

G. H. S. S. K. P.

DATE AND HOURS

Serial No	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12
1	Sabina Shaheen		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2	Mataj Begum		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3	Shazia Nari		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4	Shakeela Bebe		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5	Farzana Shaheen		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6	Majida Jalil		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7	Mahesh Mishra		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8	Riffat Jahan		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
9	Shazia Gul		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

10/10/18
 Principal
 G. H. S. S. K. P.

Daily Attendance Register of the

G. G. Hampur
S
JURS

DATE: 12

Serial No	Name	Rank	DATE												
			1	2	3	4	5	6	7	8	9	10	11	12	
1	Sabina Shaheen	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2	Mery Begum	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3	Shazia Noor	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4	Shakila Bibi	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5	Farzana Shaheen	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6	Nazish Jalil	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7	Mehwish	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8	Riffat Jabeen	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
9	Shazia Gul	S.S	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
10	Rizwana Manzoor		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Attested
Principal
G. G. Hampur

of the month of April 1 2022

OF ATTENDANCE

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remark
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	-13	(3)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	2+6	(8)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	1+5	(6)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	6+6	(12)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	-+8	(8)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	1+11	(12)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	9+4	(13)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	2+5	(7)
Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	Present	2+6	(8)

Study leave

Moral
~~20/04/22~~

30/04/22

Attended
 Principal
 G.S.S. Ranpur

Daily Attendance Register of the

9-9-14-

DATE AND HOUR

Serial No	Name	Rank	1	2	3	4	5	6	7	8	9	10	11
1	Sabina Shaheen	S.S											
2	Meryj Begum	S.S											
3	Shazia Noor	S.S											
4	Farzana Shaheen	S.S											
5	Shakila Bibi	S.S											
6	Nazish Jalil	S.S											
7	Mehwish Mushtaq	S.S											
8	Riffat Jabeen	S.S											
9	Shazia Gul	S.S											
10	Rizwana Manzoor	S.S											

Presented
Principal
Ms. S.S. Khan

8 of the month of January 2009

OF ATTENDANCE																															Total No. of Days	Remarks									
13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31																							
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	1	(1)			
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	1	(1)	
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	1	(1)	
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	4	(4)	
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	1	(1)	
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	6	(6)	
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	1	(1)
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	2	(2)
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	0	(0)
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	0	(0)
u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	u	2	(2)

31/01/09

Attested
 Principal
 H.V.S. KANDUR

Copy

1

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

Appeal No: 1403/18

Mst.Mehvish Munsif Subject Specialist (Statistics) D/o Munsif khan GGHSS Keri Raiki
Abbottabad.

...APPELLANT

VERSUS

District Education office (F) Haripur and others

...RESPONDENTS

SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth;-

PRELIMINARY OBJECTIONS:

1. Para No. 1 of the comments of the Res No.5 is incorrect and denied. Valuable rights of the appellant regarding pay are involved.
2. Para No. 2 of the preliminary objection is incorrect and denied.
3. Para No. 3 are incorrect and respondent Misconceived The Grievances of the appellant not redressed by the competent authority as a loss resort ,the appellant filed Service Appeal 1403/18 before this honorable tribunal to get her lawfully dues.

4. Para No.4 is in correct and denied .All the facts narrated in the appeal are correct to the best of the appellant.
5. Para no.5 is incorrect and denied. Burden of the proof of the malafidi is part on the respondents.
6. Para no.6 is incorrect and denied the matter relates to terms and condition of the service therefore this honorable tribunal has jurisdiction to entertain this.

REJOINDER ON FACTUAL OBJECTIONS: -

1. That Para No. 1 needs no reply.
2. Para No.2 Needs' no reply.
3. Para No.3 is incorrect and denied the appellant served the department regularly 24-9-2009 to 31-5-2010.Had she been absent from duty the department should have issue show cause Notice etc. Therefore said Para has been inserted just to cause irreparable lost to the petitioner.
4. Para no.4 is incorrect and denied detail reply in Para no.3 above.
5. Para no.5 is incorrect and denied. She was asked to performed duties, they performed duty of said period, like other employees whose contract was finished during period and they have been paid w.e.f 24-09 -2009 to 31-05-2010. Therefore the appellant is also entitled for the salary for the period she served respondent department.

As per Govt.NotificationNo.SOG (E&SE)1 85/2010/SS Regular. Dt 24-01-2011.the respondent department, competent authority, adjust the Salary of Similar subject specialist with effect from 24-09-2009 To 31-05 -2010.which is already attached at **Page No.24** of appeal of the appellant and Notification No.SOG/E&SE/1-85/2010 Dated 10-03-2011.which cleared that they were regularized w-e-f 24-09-2009 which is also already attached at Page No.22 of the appeal of the appellant.

Therefore the appellant is entitled for the salary for the period 24-09-2009 to 31-05-2010.

6. Para No. 3 is incorrect and denied.

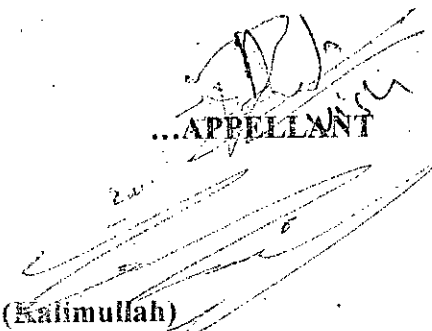
REJOINDER ON GROUNDS: -

- a. Para No. "a" of the comments is incorrect whereas Para "a" of the appeal is correct.
- b. Para "b" is incorrect and denied detailed reply given in above Para No.5
- c. Para No "C" and "D" is incorrect.
- d. Para No F "incorrect denied.

In view of the above, appeal of the appellant may graciously be accepted as prayed for.

Dated: 20/1/2020

Through;


 (Kalimullah)
 Advocate High Court, Abbottabad

AFFIDAVIT:

I, Mst. Mehvish Munsif subject Specialist (statistics) GGHS Keri Raiki Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


 DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Appeal No.1403/2018

Mehvish Munsif subject specialist (statistic) BPS-17 GGHS Keri Raiki,
Abbottabad

.....APPELLANT

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary Education Peshawar.
- 2) District Education officer (Female) Abbottabad.
- 3) Director Elementary & Secondary Education, KPK, Peshawar.
- 4) District Account Office Abbottabad.
- 5) District Education officer (Female) Haripur.
- 6) District Account Office Haripur.

(Para wise reply on behalf of respondent No.06)

Preliminary Objection:-

- 1) That the appeal is hopelessly time barred.
- 2) No locus standi
- 3) That no departmental appeal has been filed.
- 4) That the petitioner has no cause of action.
- 5) That the petition in hand is not maintainable.

Respectfully Sheweth:-

- 1) No comments related to Respondent No.1
- 2) No comments related to Respondent No.1
- 3) No comments related to Respondent No.1
- 4) Form Pay 02, Received to this office vide Diary No. 28 dt 11/10/2010 from the department for only start of pay w.e.f 1-10-2010, Copy attached and Arrear claim has not been submitted.

- 5) No comments related to Respondent No.05
- 6) No comments related to Respondent No.05

GROUNDS:-

- a) No comments related to Respondent No.05
- b) No comments related to Respondent No.5
- c) No comments related to Respondent No.05
- d) No comments related to Respondent No.05
- e) No comments
- f) No comments

In light of above Para No 04 a FORM PAY 02 for start of salary was received from respondent-05 for action.


DISTRICT ACCOUNTS OFFICER
HARIPUR

PAYROLL SYSTEM
 AMENDMENT FORM
 SINGLE EMPLOYEE ENTRY

OFFICE OF THE Principal G.C.H.S.

FOR THE MONTH OF Oct, 2010

DDO Code (Cost Center) HR 6099 Description CAFES-Khanp

Personnel Number 00438284 Employee Name Mehta

Grade (Pay Scale Group) 17 S-S

GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS			
File's ID	New Contents	Wage Type	Amount		
			Rupees	Paise	
	Pay Active	B.P. 0001	9850	0	
		HRA 1000	2955	0	
		ARA 09 1909	1477	0	
		MA 157 1947	1477	0	
		A.A 2010 1953	4925	0	
	Deduction (-)	CPF 3117	1949	0	
		EEF 3640	30	0	
		B.F 3501	250	0	
		A.G.1 3511	25	0	
		G.1 3604	230	0	

Prepared By
 PRINCIPAL
 G.C.H.S. (Secondary)
 Khanpur, Haripur

Checked By
 Senior Staff Accountant
 Haripur

1

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Appeal No: **1403/18**

Mst.Mehvish Munsif Subject Specialist (Statistics) D/o Munsif khan GGHS Keri Raiki
Abbottabad.

.....**APPELLANT**

VERSUS

District Education office (F) Haripur and others

...**RESPONDENTS**

SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth;-

PRELIMINARY OBJECTIONS:

1. Para No. 1 of the comments of the Res No.5 is incorrect and denied. Valuable rights of the appellant regarding pay are involved.
2. Para No. 2 of the preliminary objection is incorrect and denied.
3. Para No. 3 are incorrect and respondent Misconceived The Grievances of the appellant not redressed by the competent authority as a loss resort ,the appellant filed Service Appeal 1403/18 before this honorable tribunal to get her lawfully dues.

4. Para No.4 is in correct and denied .All the facts narrated in the appeal are correct to the best of the appellant.
5. Para no.5 is incorrect and denied. Burden of the proof of the malafidi is part on the respondents.
6. Para no.6 is incorrect and denied the matter relates to terms and condition of the service therefore this honorable tribunal has jurisdiction to entertain this.

REJOINDER ON FACTUAL OBJECTIONS; -

1. That Para No. 1 needs no reply.
2. Para No.2 Needs' no reply.
3. Para No.3 is incorrect and denied the appellant served the department regularly 24-9-2009 to 31-5-2010.Had she been absent from duty the department should have issue show cause Notice etc. Therefore said Para has been inserted just to cause irreparable lost to the petitioner.
4. Para no.4 is incorrect and denied detail reply in Para no.3 above.
5. Para no.5 is incorrect and denied. She was asked to performed duties, they performed duty of said period, like other employees whose contract was finished during period and they have been paid w.e.f 24-09 -2009 to 31-05-2010. Therefore the appellant is also entitled for the salary for the period she served respondent department.

As per Govt.NotificationNo.SOG (E&SE)1 85/2010/SS Regular. Dt 24-01-2011.the respondent department, competent authority, adjust the Salary of Similar subject specialist with effect from 24-09-2009 To 31-05 -2010.which is already attached at **Page No.24** of appeal of the appellant and Notification No.SOG/E&SE/1-85/2010 Dated 10-03-2011.which cleared that they were regularized w-e-f 24-09-2009 which is also already attached at Page No.22 of the appeal of the appellant.

Therefore the appellant is entitled for the salary for the period 24-09-2009 to 31-05-2010.

6. Para No. 3 is incorrect and denied.

REJOINDER ON GROUNDS; -

- a. Para No. "a" of the comments is incorrect whereas Para "a" of the appeal is correct.
- b. Para "b" is incorrect and denied detailed reply given in above Para No.5
- c. Para No "C" and "D" is incorrect.
- d. Para No F "incorrect denied.

In view of the above, appeal of the appellant may graciously be accepted as prayed for.

Dated: 20/1/2020

Through;


...APPELLANT


(Kalimullah)

Advocate High Court, Abbottabad

AFFIDAVIT;

I, Mst. Mehvish Munsif subject Specialist (statistics) GGHS Keri Raiki Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


DEPONENT

Copy

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

Appeal No: 1403/18

Mst.Mehvish Munsif Subject Specialist (Statistics) D/o Munsif khan GGHSS Keri Raiki
Abbottabad.

....APPELLANT

VERSUS

District Education office (F) Haripur and others

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Therefore the appellant is entitled for the salary for the period 24-09-2009 to 31-05-2010.

6. Para No. 3 is incorrect and denied.

REJOINDER ON GROUNDS: -

- a. Para No. "a" of the comments is incorrect whereas Para "a" of the appeal is correct.
- b. Para "b" is incorrect and denied detailed reply given in above Para No.5
- c. Para No "C" and "D" is incorrect.
- d. Para No F "incorrect denied.

In view of the above, appeal of the appellant may graciously be accepted as prayed for.

Dated: 20/1/2020

Through;


...APPELLANT


(Kalimullah)

Advocate High Court, Abbottabad

AFFIDAVIT:

I, Mst. Mehvish Munsif subject Specialist (statistics) GGHS Keri Raiki Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Appeal No.1403/2018

Mehvish Munsif subject specialist (statistic) BPS-17 GGHS Keri Raiki,

Abbottabad

.....APPELLANT

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary Education Peshawar.
- 2) District Education officer (Female) Abbottabad.
- 3) Director Elementary & Secondary Education, KPK, Peshawar.
- 4) District Account Office Abbottabad.
- 5) District Education officer (Female) Haripur.
- 6) District Account Office Haripur.

(Para wise reply on behalf of respondent No.06)

Preliminary Objection:-

- 1) That the appeal is hopelessly time barred.
- 2) No locus standi
- 3) That no departmental appeal has been filed.
- 4) That the petitioner has no cause of action.
- 5) That the petition in hand is not maintainable.

Respectfully Sheweth:-

- 1) No comments related to Respondent No.1
- 2) No comments related to Respondent No.1
- 3) No comments related to Respondent No.1
- 4) Form Pay 02, Received to this office vide Diary No. 28 dt 11/10/2010 from the department for only start of pay w.e.f 1-10-2010, Copy attached and Arrear claim has not been submitted.

- 5) No comments related to Respondent No.05
- 6) No comments related to Respondent No.05

GROUNDS:-

- a) No comments related to Respondent No.05
- b) No comments related to Respondent No.5
- c) No comments related to Respondent No.05
- d) No comments related to Respondent No.05
- e) No comments
- f) No comments

In light of above Para No 04 a FORM PAY 02 for start of salary was received from respondent-05 for action.


DISTRICT ACCOUNTS OFFICER
HARIPUR



PAYROLL SYSTEM
 AMENDMENT FORM
 SINGLE EMPLOYEE ENTRY

OFFICE OF THE Principal G.G.H.
 FOR THE MONTH OF Oct, 2010

DDO Code (Cost Center) HRG-99 Description Caress-Khwa

Personnel Number 00438284 Employee Name Mea

Grade (Pay Scale Group) 17 S-5

GENERAL DATA CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS			
File ID	New Contents	Wage Type	Rupees		Amount
	Pay Active	BPA 6001	9	850	X
		HRA 1600	2	955	X
		ARA-09 1909	1	477	X
		MA-157 1947	1	477	X
		A.A-2010 1953	4	925	X
	Deduction (-)	CPF 3117	1	249	X
		EEF 3640	3	0	X
		B.F 3501	2	50	X
		A.G.1 3511	2	5	X
		G.I 3604	2	30	X

Prepared By [Signature]
 PRINCIPAL
 Girls Higher Secondary
 of Khanpur, Haripur

Checked By [Signature]
 Senior Distt: Accountant
 Haripur

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 581 /ST

Dated 25/03 / 2021

To


The Secretary E&SE Department,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: -

JUDGMENT IN APPEAL NO. 1403/2018, MST. MEHVISH MUNSIF.

I am directed to forward herewith a certified copy of Judgement dated 16.03.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

BEFORE THE KHYBER PAKHTUKHWA SERVICE TRIBUNAL
PESHAWAR

Application

IN

Service Appeal No.1403/18

Mehvish Munsif Subject Specialist (Statistic) BPS-17, GGHS Keri Raiki, District Abbottabad.

...APPELLANT

V E R S U S

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar & Others.

...RESPONDENTS

APPLICATION FOR IMPLEADMENT OF DISTRICT EDUCATION OFFICER (FEMALE) / DISTRICT ACCOUNTS OFFICER HARIPUR. IN THE PANNEL OF RESPONDENTS AS RESPONDENT NO.5 & 6.

Respectfully Sheweth,

1. That, the captioned service appeal is pending adjudication before this honourable tribunal and next date have been fixed 16/09/2019.
2. That, the appellant was serving for the period w.e.f. 24/09/2009 to 31/05/2010 in District Haripur therefore, the payment of the said period is to be paid from District Haripur.

3. That, at the time of filing of Service Appeal before this Honourable Tribunal, the DEO (Female) and District Accounts Officer Haripur, was inadvertently could not be made party now, DEO (Female) Haripur and District Accounts Officer Haripur are a necessary party and is to be impleaded as respondent No.5 & 6.

In view of the above, it is prayed that District Education Officer (F) Haripur and District Accounts Officer, Haripur, may graciously be ordered to be impleaded as Respondent No.5 & 6.

[Signature]
.....APPELLANT

Dated:- 18 / 9 /2019

Through:

[Signature]
(KALIMULLAH)

Advocate High Court, Abbottabad

VERIFICATION:

Verified on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

[Signature]
.....APPELLANT

Copy

1

BEFORE THE KHYBER PAKHTUKHWA SERVICE TRIBUNAL
PESHAWAR

Application

IN

Service Appeal No.1403/18

Mehvish Munsif Subject Specialist (Statistic) BPS-17, GGHS Keri
Raiki, District Abbottabad.

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Elementary & Secondary Education, Peshawar & Others.

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