

29.11.2019

Counsel for the appellant present.

Learned counsel requests for time to further prepare the brief. Adjourned to 08.01.2020 before S.B.


Chairman

08.01.2020

Junior to counsel for the appellant present.

Requests for adjournment due to general strike of the Bar. Adjourned to 18.02.2020 before S.B.


Chairman

18.02.2020

Appellant absent. Learned counsel for the appellant absent. Case called for several times but no one appeared on behalf of appellant. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.

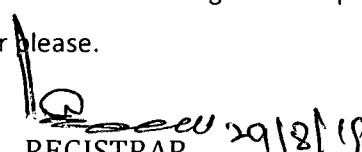



(Muhammad Hamid Mughal)
Member

ANNOUNCED.
18.02.2020

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1109/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/08/2019	<p>The appeal of Mst. Saeeda Begum resubmitted today by Mr. Sohrab Khan 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 29/8/19</p>
2-	02/09/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15/10/19.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	15.10.2019	<p>Nemo for appellant.</p> <p>Notice be issued to appellant/learned counsel for preliminary hearing before S.B on 29.11.2019.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mst. Saeeda Begum of daughter of Faiz-ul-Haq GGHS Maneri Bala District Swabi received today by i.e. on 01.08.2019 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

- ✓ 1- Memorandum of appeal may be got signed by the appellat.
- ✓ 2- Annexures of the appeal may be attested.
- ✓ 3- Annexures of the appeal may be flagged.
- 4- Address of respondent no. 4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ✓ 5- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1360 /S.T,

Dt. 1-8- /2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sohrab Khan Advocate,
High Court at Judicial Complex
District Swabi.

Respectfully Sheweths

I removed the whole objection

Counsel for appellat

Address of Respondent No 4



سہیلہ بیگم کے خلاف رجسٹرڈ کیس
میں اپنی طرف سے تمام اعتراضات
حذف کر دیے گئے ہیں

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1109/2019

Saeeda Begum-----Appellant

Versus

Secretary Education K.P.K Peshawar-----Respondents

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INDEX

S.No	Description of Documents	Annex	Pages
1.	Service appeal along with affidavit		1-6
2.	Copy of tentative seniority list	A	7
3.	Copy of Final List	B	8-9
4.	Copy of notification	C - D	10-11
5.	Copy of departmental appeal	E	12
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7.	Wakalat Nama	F	14
8.			

Appellant



Through Counsel :

SOHRAB KHAN Advocate

High Court

At Judicial Complex Swabi

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1109/2019

Saeeda Begum daughter of Faiz Ul Haq R/O GGHS

Maneri Bala Moh: Baro Khel Tehsil & District Swabi

-----Appellant

**Khyber Pakhtukhwa
Service Tribunal**

Versus

Diary No. 1118

Dated 01-08-2019

1. Secretary Education K.P.K Peshawar
2. Director General Education K.P.K Peshawar
3. E.D.O Education Female Swabi District Swabi.
4. Safia Ahmad daughter of Ahmad Ali R/O GGHS

Panj Pir Tehsil and District Swabi.

-----Respondents

Filed to-day
Registrar
9/8/19

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APPEAL UNDER SECTION 4 OF THE SERVICE
TRIBUNAL ACT 1974 WHEREBY
DEPARTMENTAL APPEAL OF APPELLANT WAS
REMAINED UN-RESPONSE BY RESPONDENT

Re-submitted to-day
and filed.
Registrar 29/8/19

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NO.2 ,HENCE THE APPEAL INTER ALIAS ON THE
FOLLOWING FACTS AND GROUNDS.

Sir,

Respectfully Sheweth ;

FACTS:-

1. That the appellant was appointed as Qirat Teacher on 05.04.1999.
2. That the respondent No.4 was appointed as Qerat Teacher on 16.09.2006.
3. That the respondent No. 3 issued a tentative seniority list dated 31.08.2018 wherein the appellant's name is shown as serial No 10 while the name of respondent No.4 is shown as serial No 17 (The said seniority is attached as annexure A)
4. That after the issuance of said tentative seniority list, the respondent No.3 issued the final seniority list wherein the name of appellant was shown as serial No. 9 while respondent No.2 was shown in

②

serial No.2. The appellant was unaware of both the said seniority list as neither these lists were circulated nor pasted on notice boards in the appellants school . (Copy of annexed as annexure B)

5. That through an adjustment order dated 05.03.2019 in accordance with notification issued by the respondent No.2 vide endorsement No 3927-32/A-17/SS/F/promotion cases/ 2019 dated 18.02.2019. The respondent No.3 illegally promoted the respondent No.4 and ignored the appellant which is illegal, against the law and service rules of the land which is a clear violation of seniority of promotion laws.

(Copy is attached an annexure C)

6. That the appellant filed a departmental appeal dated on 06. 04.2019 against the illegal order of respondent No. 3 before the respondent No.2 but no remedy was granted uptill now .

Copy of departmental appeal is attached as annexure "D"

(w)

7. That feeling aggrieved an illegal order he made departmental appeal which as not decided uptill now and mandatory stipulated period of 90 days for waiting the decision of the authority has since been elapsed .Since the respondent authority are not prepared to listen the genuine grievance to the appellatnt regarding the illegal order hence this appeal inter alia on the following grounds.

GROUNDS

A. That the impugned order is illegal unconstitutional and void abinitio and is liable to be set aside it is further averred that abuse of discretion by a public functionary violates Art 4 of constitution, appellatnt rights to be dealt with in accordance with law was violated which is granted in Art 4 of the constitution of Pakistan 1973.

B. That the respondents have also violated Art 25 and 27 of the constitution of the Islamic Republic of Pakistan 1973 which guarantees equality of all citizen and safeguard against discrimination in services .

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C. That great injustice has been done to the appellant by the respondents.

D. That after no consideration was given by the respondents to the departmental representation. Appellant has come to this Honourable Tribunal to get justice.

E. That appellant shall urge any other points at the time of arguments with the permission of this Honourable Tribunal.

It is premise it is respectfully prayed that on acceptance of this appeal the order of respondent No.3 may kindly be set aside with heavy cost

Appellant



Sunder Begm

Through Counsel :

SOHRAB KHAN Advocate

High Court

At Judicial Complex Swabi

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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____/2019

Saeeda Begum-----Appellant

Versus

Secretary Education K.P.K Peshawar-----Respondents

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AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court .

Deponent _____

Saeeda Begum

*11
Cm's
new*



2

A

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

TENTATIVE SENIORITY LIST OF Sr. Qaria BPS-15 FEMALE , DISTRICT SWABI DISPLAY, LAST FOR APEAL/ QUERY :31-08-2018
No Apeal etc will be accepted after Last date. For Apeal , or addition of missed names please fill the attached blank form and relevent docs

S.N'S	Name of Teacher	Father's Name	BPS 15	Name of School	Qualification		Subject in BA/BSC	Div: in BA/B.Sc	Date of Birth	Date of 1st Appt: in Edu: Deprt	Date of Appointment as a Regular Qarior Date of Passing Professional Exam which ever is earlier
					Academic	Professional					
1	Rakham Akhtar	Usman Khan	BPS 15	GGHS Dagai	MA (ISL)	Qirat/ M.Ed	P.Sc.;U, Isl:	3rd	06/04/1960	22/11/86	22/11/1986
2	Sehad Bibi	Mirbaz Khan	BPS 15	GGHSS Topi	BA	Tajweed			01/04/1968	14-12-1986	14/12/1986
3	Sabeha Bibi	Abdul Basit Khasn	BPS 15	GGHS M.Khel Zaida	FA	Qaiat			30/01/1962	23/09/1986	12/09/1987
4	Safia Gul	Manezai	BPS 15	GGHS Yar Hussain	F.A	Qarit			12/01/1973	05/03/1992	03/03/1992
5	Zuqaida	Gharib Ullah	BPS 15	GGHSS Kotha	F.A	Qarit			05/04/1970	19/05/1993	19/05/1993
6	Nigar Sultan	Saif Ur Khan	BPS 15	GGHS Gar Munara	BA	Qaria			16-04-70	29-05-93	29/05/1993
7	Amina Begum	Afreed Khan	BPS 15	GGHS Bamkhel	MA (Urdu)	Qairat/BED	Pa, Isl:	2nd	02-05-1974	29-05-1993	25/05/1993
8	Hasrat Begum	Ameer Ghawas	BPS 15	GGCMHS Swabi	MA(Isl)	Qairat/Bed ,CT	Pa, Isl:	2nd	15-06-1971	13-06-1993	13/06/1993
9	Lala Rukh	Muhammad Saeed	BPS 15	GGHS KSK	MA(Isl)	Qairat/Med/Hifaz	Eng., Isl	3rd	04-11-1976	13-04-1996	13/04/1996
10	Saeeda Begum	Faizul Haq	BPS 15	GGHS Maneri Bala	MA (Urdu)	Qairat/BED	U, Isl:	2nd	12-10-1973	05-04-1999	05/04/1999
11	Zakia Begum	Aminul Haq	BPS 15	GGHS Gulshan Abad	MA (Urdu)	Qairat/BED	U, Isl:	2nd	01-01-1975	05-04-1999	05/04/1999
12	Malika Begum	Faizul Haq	BPS 15	GGHSS Baja	MA	Qairat/BED	Pashto, Isl	2nd	07-05-1976	05-04-1999	05/04/1999
13	Shagufta Sulten	Sultan Muhammad	BPS 15	GGHS Kunda	BA	Qirat			01-03-1979	06-04-1999	06/04/1999
14	Jannat Pari	Sarfaraz Khan	BPS 15	GGHS Salim Khan	MA	Qirat/BED/CT/M.Ed			12-01-1978	06-04-1999	06/04/1999
15	Bushra Begum	Said Bacha	BPS 15	GGHS Sodher	FA	Qirat			08-05-1979	23-04-1999	23/04/1999
16	Aneeia	Muhammad Altaf	BPS 15	GGHSS Shamansoor	MA	Qirat			01-11-1986	15-09-2006	15/09/2006
17	Safia Ahmad	Ahmad Ali	BPS 15	GGHS Marghuz	BA	B.Ed, M.Ed			18-04-1984	16-09-2006	16/09/2006
18	Saiqa	Shams ur Rehman	BPS 15	GGHS Anbar	MA	Qirat			01-03-1982	16-09-2006	16/09/2006
19	Ghazala	Mirza Muhammad	BPS 15	GGHS Tarakai	MA	Qirat/BED/CT			04-05-1982	16-09-2006	16/09/2006
20	Bareera Taj	Taj Bahader	BPS 15	GGHS PANJ PIR	MA(Isl)	Qirat			25-03-1985	16-09-2006	16/09/2006

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ATTACHED
To be a copy

DISTRICT EDUCATION OFFICE (FEMALE) SWABI

FINAL SENIORITY LIST OF Sr. Qaria BPS-15 FEMALE , DISTRICT SWABI DISPLAY

S.N	Name of Teacher	Father's Name	BPS 15	Name of School	Qualification		Subject in BA/BSC	Div: in BA/B.Sc	Date of Birth	Date of 1st Appt: in Edu: Dept	Date of Appointment as a Regular Qari	Date of Promotion to S.Qaria
					Academic	Professional						
1	Lala Rukh	Muhammad Saeed	BPS 15	GGHS KSK	MA(Isl)	Qairat/Med/Hifaz	Eng, Isl	3rd	04-11-1976	13-04-1996	13/04/1996	01/03/2013
2	Safia Ahmad	Ahmad Ali	BPS 15	GGHS Marghuz	MA	Qirat, B.Ed, M.Ed		2nd	18-04-1984	16-09-2006	16/09/2006	01/03/2013
3	Rakhm Akhtar	Usman Khan	BPS 15	GGHS Dagai	MA (ISL)	Qirat/ M.Ed	P.Sc.,U, Isl:	3rd	06/04/1960	22/11/86	22/11/1986	29/05/2013
4	Sehad Bibi	Mirbaz Khan	BPS 15	GGHSS Topi	BA	Tajweed			01/04/1968	14-12-1986	14/12/1986	29/05/2013
5	Safia Gul	Manezai	BPS 15	GGHS Yar Hussain	F.A	Qarit			12/01/1973	05/03/1992	03/03/1992	29/05/2013
6	Zulqaida	Gharib Ullah	BPS 15	GGHSS Kotha	F.A	Qarit			05/04/1970	19/05/1993	19/05/1993	29/05/2013
7	Nigar Sultan	Saif Ur Khan	BPS 15	GGHS Gar Munara	BA	Qaria			16-04-70	29-05-93	29/05/1993	29/05/2013
8	Hasrat Begum	Ameer Ghawas	BPS 15	GGCMHS Swabi	MA(Isl)	Qairat/Bed ,CT	Pa, Isl:	2nd	15-06-1971	13-06-1993	13/06/1993	29/05/2013
9	Saeeda Begum	Faizul Haq	BPS 15	GGHS Maneri Bala	MA (Urdu)	Qairat/BED	U, Isl:	2nd	12-10-1973	05-04-1999	05/04/1999	29/05/2013
10	Zakia Begum	Aminul Haq	BPS 15	GGHS Gulshan Abad	MA (Urdu)	Qairat/BED	U, Isl:	2nd	01-01-1975	05-04-1999	05/04/1999	29/05/2013
11	Malika Begum	Faizul Haq	BPS 15	GGHSS Baja	MA	Qairat/BED	Pashto, Isl	2nd	07-05-1976	05-04-1999	05/04/1999	29/05/2013
12	Shagufta Sultan	Sultan Muhammad	BPS 15	GGHS Kunda	BA	Qirat			01-03-1979	06-04-1999	06/04/1999	29/05/2013
13	Bushra Begum	Said Bacha	BPS 15	GGHS Sodher	FA	Qirat			08-05-1979	23-04-1999	23/04/1999	29/05/2013
14	Sabeha Bibi	Abdul Basit Khasr	BPS 15	GGHS M.Khel Zaida	FA	Qairat			30/01/1962	23/09/1986	12/09/1987	17/11/2014
15	Jannat Fari	Sarfaraz Khan	BPS 15	GGHS Salim Khan	MA	Qirat/BED/CT/M.Ed			12-01-1978	06-04-1999	06/04/1999	17/11/2014
16	Aneela	Muhammad Altaf	BPS 15	GGHSS Shamansoor	MA	Qirat			01-11-1986	15-09-2006	15/09/2006	17/11/2014
17	Saiqa	Shams ur Rehman	BPS 15	GGHS Anbar	MA	Qirat			01-03-1982	16-09-2006	16/09/2006	28/07/2016
18	Ghazala	Mirza Muhammad	BPS 15	GGHS Tarakai	MA	Qirat/BED/CT			04-05-1982	16-09-2006	16/09/2006	28/07/2016
19	Bareera Taj	Taj Bahader	BPS 15	GGHS PANJ PIR	MA(Isl)	Qirat			25-03-1985	16-09-2006	16/09/2006	28/07/2016
20	Adeeba Gul	Gulshad Khan	BPS 15	GGHS Kaddi	MA	Qirat/B.Ed			20-04-1987	16-09-2006	16/09/2006	28/07/2016
21	Safia Naz Begum	Raheem Gul	BPS 15	GGHS Yar Hussain	MA	Qirat/CT/B.Ed			03-03-1981	18-09-2006	18/09/2006	27/09/2017
22	Tabassum Khan	Fariddun Khan	BPS 15	GGHSS Shawa	MA(Isl)	Qirat/BED			15-02-1979	16-09-2006	19/09/2006	27/09/2017

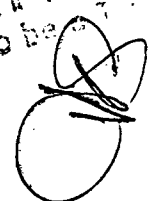
FINAL SENIORITY LIST OF Qaria, BPS 12 FEMALE , DISTRICT SWABI

S.N	Name of Teacher	Father's Name	BPS	Name of School	Qualificatio n Acad	Prof Qualif	Date of Birth	Appt: in Edu:	Date of Apptt: as a Reg Qari or Date of Passing Profi Exam which ever is earlier	Remarks
1	Shehnaz Begum	Sultan Zaib	BPS-12	GGHSS Dobian	FA	Qairat	15-02-66	19/12/1986	10/11/1986	
2	Naveeda Alam	S.Zulfiqar	BPS-12	GGHS Ismaila	SSC 3rd	Qaria	04/04/1969	17/11/1986	17/11/1986	
3	Farizoon	Gul Ahmad	BPS-12	GGHSS Kalabat	SSC	Qairat	02/02/1958	01/02/1989	01/02/1989	
4	Nighat Ara	Baz Muhammad	BPS-12	GGHS Maini	SSC	Qairat	06-09-1965	24-05-1995	24/05/1995	

(9)

S.N	Name of Teacher	Father's Name	BPS	Name of School	Qualificatio n Acad	Prof Qualif	Date of Birth	Date of 1st Appt: in Edu:	Date of Appott: as a Reg Qari or Date of Passing Profl Exam which ever is earlier	Remarks
5	Rabeela BiBi	S.Abbas Ali Shah	BPS-12	GGHS Manki	MA	Qirat/CT/B.Ed	01-01-1982	18-09-2006	18/09/2006	
6	Fozia Noreen	Muhammad Qasim	BPS-12	GGHS Tandkoi	MA(Isl)	Qirat/BED	21-02-1981	20-09-2006	20/09/2006	
7	Uzma Gul	Gul Muhammad	BPS-12	GGHS S. Shah Kothy	BA	Qirat	16-04-1984	23-09-2006	23/09/2006	
8	Aneela Begum	Sher Zada	BPS-12	GGHS Turlandi	BA	Qirat	03-03-1981	01-09-2007	01/09/2007	
9	Mehreen	Malik Akbar Khan	BPS-12	GGHS Gandaf	MA	Qirat/B.Ed	13-03-1983	02-01-2012	02/01/2012	
10	Neelam Zaman	Zaman Khan	BPS-12	GGHS Rafiq Abad	MA	Qirat/Hifz	05/01/1985	02-01-2012	02/01/2012	
11	Ayesha Shams	Shamsul Arifeen	BPS-12	GGHS Yaqubi	MA	Qirat/BED	27-01-1985	02-01-2012	02/01/2012	
12	Tehmeena Gul	Gul Pasand	BPS-12	GGHS Zaroobi	BA	Qirat/Hifz	13-12-1986	02-01-2012	02/01/2012	
13	Saima Begum	Malik Aman	BPS-12	GGHS Shiekh Dheri	MA	Qirat/Hifz/B.Ed	01-04-1987	02-01-2012	02/01/2012	
14	Farhana Gul	Ashfaq Hussain	BPS-12	GGHS Batakora	SSC	Qirat/Hifz	02/04/1988	02-01-2012	02/01/2012	
15	Raveeda	Hasan Muhammad	BPS-12	GGHS Permolli	MA	Qirat/Hifz/CT/BED	01-01-1983	03-01-2012	03/01/2012	
16	Ruqqaya Begum	Muzammil Khan	BPS-12	GGHS Mathra Bachai	BA	Qirat/Hifz/BED	20-03-1986	03-01-2012	03/01/2012	
17	Husnul Wara	Mulwi Misal Khan	BPS-12	GGHS Beka	FA	Qirat/Hifz	01-01-1988	03-01-2012	03/01/2012	
18	Ruqqaya Habib	Habib Shah	BPS-12	GGHS Lahore Sharqi	BSc	Qirat/Hifz	04/10/1988	03-01-2012	03/01/2012	
19	Nazira	Mian Gul	BPS-12	GGHS Malik Abad	MA	Qirat/hifz	04/03/1982	23-03-2013	26/12/2013	

District Education Officer
Female Swabi

DATE: 26/12/2013
To be signed




DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT SWABI
PH# 0938-280339

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ADJUSTMENT ORDER

Consequent upon the Notification issued by the Director E&SE Khyber Pakhtunkhwa Peshawar Endst:No 3927-32/A-17//SS/F/Promotion Cases/2019 dated Peshawar the 18-02-2019 the following female SCTs/CTs SDMs/DMS SATs/ATs STTs/ TTs/Senior Qarias & PSHTs/ SPSTs/PSTs promoted to the post of SST (Bio-Chemistry / General) are hereby adjusted at the school noted against each in BPS-16 (@Rs.18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms and conditions given below with effect from 18-02-2019.

SST (Bio-Chemistry)

S#	Name of Teacher	Present place of posting	Name of school where adjusted	Remarks
1	Salma Zaib, S.CT	GGHS KSK	GGHS SUDHER	Adjusted against SST (Bio-Chem) Vacant Post
2	Sabecha Begum, S.PST	GGPS No.2 Hund	GGHS PABAINI	Adjusted against SST (Bio-Chem) Vacant Post
3	Maryam Karim, PST	GGPS No.1 Kalabat	GGIISS BAJA	Adjusted against SST (Bio-Chem) Vacant Post

SST(General)

S#	Name of Teacher	Present place of posting	Name of school where adjusted	Remarks
1	Salma Tasleem , SCT	GGHS Sudher	GGMS DHAB KOROONA	Adjusted against SST (General) Vacant post
2	Hizra Khatoon,, SCT	GGHS Marghuz	GGHS PANJPIR	Adjusted against SST (General) Vacant post
3	Sacceda , SCT	GGHS Mathra Bachai	GGMS SAPROONA (BACHAI)	Adjusted against SST (General) Vacant post
4	Rafaqat, SCT	GGHSS Dagai	GGHS YAR HUSSAIN	Adjusted against SST (General) Vacant post
5	Zakia Anjum, SCT	GGHSS Shewa	GGHS TARAKAI	Adjusted against SST (General) Vacant post
6	Syed Rubina Naz, SCT	GGHSS Kalu Khan	GGHS SARWAR SHAH KOTE	Adjusted against SST (General) Vacant post
7	Naheed Begum, SCT	GGHS Marghuz	GGHS PANJPIR	Adjusted against SST (General) Vacant post
8	Bibi Sheema, SCT	GGHSS Kalu Khan	GGHSS KALU KHAN	Adjusted against SST (General) post to be vacated on 22-04-2019
9	Yasmin , SCT	GGCMHS Swabi	GGCHMS SWABI	Adjusted against SST (General) Vacant post
10	Rubina Begum, SCT	GGHS Tarakai	GGHS TARAKAI	Adjusted against SST (General) Vacant post
11	Kaloom Begum, PSHT	GGPS Shagai Maneri	GGHS SALIM KHAN	Adjusted against SST (General) Vacant post
12	Rukhsana Yasmin, PSHT	GGPS Pak Kaya	GGHSS SHAHMANSOOR	Adjusted against SST (General) Vacant post

Stamp and signature of the District Education Officer (Female) District Swabi.

13	Khatmu Nisa , PSHT	GGPS Gadaf No.1	GGHS GANDAF	Adjusted against SST (General) Vacant post
14	Bibi Salima , PSHT	GGPS Ahmad Nawaz Banda	GGHS KABGANI	Adjusted against SST (General) Vacant post
15	Shazia Mubarak, PSHT	GGPS No.1 Kotha	GGHSS BAJA	Adjusted against SST (General) Vacant post
16	Farhat Naz, PSHT	GGPS Sheraghund	GGCMS PARMOLI	Adjusted against SST (General) Vacant post
17	Lai Pari, SDM	GGHS Tordher	GGHS TORDHER	Adjusted against SST (General) Vacant post
18	Neelam Begum, SAT	GGHS Sard Cheena	GGMS SHAHDAD KILLI ✓	Adjusted against SST (General) Vacant post
19	Razia Shaheen, STT	GGHS KSK	GGHS SARWAR SHAH KOTE	Adjusted against SST (General) Vacant post
20	Safia Ahmad, S.Qaria	GGHS Marghuz	GGHS PANJPIR	Adjusted against SST (General) Vacant post

TERMS AND CONDITIONS.

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time in case of their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Their inter-Se-Seniority on lower post will remain intact.
5. They will give an undertaking to be recorded in their Service Book to the effect that if any over payments made to them in the light of this order will be recovered and if they are wrongly promoted, they will be reversed.
6. Before handing over charge once again their documents may be checked, if they have not the acquired relevant qualifications as per rules, they may not be handed over charge of the post.
7. Charge report should be submitted to all concerned.
8. No TA/DA is allowed.
9. S.No: 08 will take over charge on 22-04-2019 after the retirement of Bibi Yasmeen, SST.

(REHANA YASMEEN)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst.No. 1379-85 /DA-II/SST Adjustment/ Dated Swabi the 5-3-2019

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

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner, Swabi.
3. District Monitoring Officer (IMU), Swabi.
4. District Accounts Officer, Swabi.
5. Principals/Head Mistresses concerned schools.
6. ADEO (Estab Sec and Primary) Local Office.
7. ADEO (B&A) Local Office.
8. Officials concerned.

MA
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

05/3/19

(12)

(E)

حکومت خواتین و بچوں کی سہولتیں

معاون: خواتین ایس ایم و ڈسٹرکٹ ایجوکیشن آفیسر، سیل ایس ایچ ایچ

صبا علی و خاتون ایس ایم ڈسٹرکٹ ایجوکیشن

1) سیدہ سحر فاروقی صاحبہ (Saeeda Begum) ڈسٹرکٹ ایجوکیشن آفیسر، سیل ایس ایچ ایچ

سٹ فورم 25/8 | 31 سے سیدہ سحر 10 تھا۔ جبکہ سیدہ سحر 17 تھا۔
ان کے بارے میں ڈسٹرکٹ ایجوکیشن آفیسر، سیل ایس ایچ ایچ سے
(تفصیلات کے ساتھ)

2) ڈسٹرکٹ ایجوکیشن آفیسر، سیل ایس ایچ ایچ / 32-3927

فورم 3/3/2019 کو بار کی جن میں ایڈووکیٹ کا نام درج نہیں
تھا اور ایڈووکیٹ کو Seniority سے شروع کیا گیا اور ایڈووکیٹ
سیدہ سحر (31) سے سیدہ سحر (32) سے سیدہ سحر (3927)
فصل علی خلاف قانون اور خلاف واقعات کے بارے میں ایڈووکیٹ
ارڈر قابل عملی ہے۔ یہ قابل متوجہ ہے۔

لکھنؤ سیدہ سحر کے بارے میں آرڈر مندرجہ ذیل کے مطابق ہے۔

SOHRAB KHAN
Advocate High Court
District Courts Swat

صبا علی صاحبہ

2/4/2019

سیدہ سحر

Saeeda Begum

بعد اہت صا۔ سروہ ٹریبونل رٹناور

14

F



مورخہ
مقدمہ
دعوی
جرم
20 منجانب
نام
سیدہ بلع
سیدہ بلع
سیدہ بلع

باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی وکل
کارروائی متعلقہ آن مقام **لویڈا** کے لئے **سیدہ بلع** صاحبہ
مقرر کر کے اقرار کیا جاتا ہے کہ صاحبہ موصوف کو مقدمہ کی کل کارروائی کا کاپی اختیار ہوگا۔ نیز وکیل
صاحبہ کو کرنے راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے، جواب دی اور اقبال دعوی
اور بصورت ڈگری کرنے اجراء اور وصولی چیک و رڈ پیہ، عرض دعویٰ اور درخواست ہر قسم کی تصدیق
زیر اس پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور
منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ
مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا
اختیار ہوگا۔ اور صاحبہ مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے۔ اور اس کا
ساختمہ پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا
اس کے مستحق وکیل صاحبہ موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔
اگر کوئی تاریخ پیشی مقام ذورہ پر ہو یا حد سے باہر ہو تو وکیل صاحبہ پابند ہوں گے کہ پیروی مذکور
کریں۔ لہذا نکات نامہ لکھ دیا کہ سندر ہے۔

31 جولائی 2019ء

الرقوم

Syedha Begum
سیدہ بلع

کے لئے منظور ہے۔

M. S. Khan
M. S. Khan


Before the Service Tribunal
Peshawal

Saeeda Begum v/s Secretary Edun KPK.
Peshawal etc

Service Appeal.

Subject: Correct address of Respondent
No 4 as follows.

سہ ماہی سروس ایڈیشنل ایڈیشنل ایڈیشنل
سہ ماہی سروس ایڈیشنل ایڈیشنل ایڈیشنل
سہ ماہی سروس ایڈیشنل ایڈیشنل ایڈیشنل

Saeeda Begum. (Appellant)
Through Counsel. 

29/8/2018

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No.....1109..... of 20 19.

Saeeda Begum

Appellant/Petitioner

Versus

Secy Education KPK Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner


Saeeda Begum daughter

of Faiz ul Haq R/o GbHS Mamevi

Bala Moh: Baro Khel Tehsil Dist Swabi

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 29-11-2019 at 9:00 AM at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No.....1109..... of 20 19.

Saeeda Begum

Appellant/Petitioner

Versus

Secy Education KPTB Peshawar
RESPONDENT(S)

Notice to Appellant/Petitioner

Sohrab Khan Advocate

High Court At Judicial
Complex Swabi

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on.....

29-11-2015 at 9:30 AM at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.



Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.