

15th June, 2022

Counsel for the appellant present.

Learned counsel for the appellant sought adjournment to further prepare the brief. Last opportunity granted. To come up for preliminary hearing on 16.06.2022 before S.B.



(Kalim Arshad Khan)
Chairman

16th June, 2022

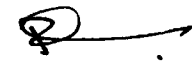
Counsel for the appellant present.

The impugned order was passed on 26.10.2021. The appellant filed departmental representation against the impugned order on 15.11.2021 and she filed appeal before this Tribunal on 27.01.2022 but statutory period was not passed which has been passed during the pendency of this appeal, therefore, this appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 08.08.2022 before S.B.



(Kalim Arshad Khan)
Chairman

8.8.2022 Due to the Public Holiday the
Case is Adjourned to 20-9-2022


Reader.


24.02.2022

Due to retirement of the Hon'able Chairman, the case is adjourned to 19.05.2022 for the same before D.B.


Reader

19.05.2022

Learned counsel for the appellant present and requested for adjournment in order to further prepare the brief. Adjourned. To come up for preliminary hearing 03.06.2022 before S.B.

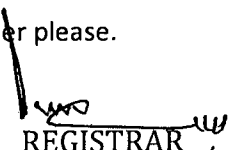



(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 129/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/01/2022	<p>The appeal of Mst. Rashida Akhtar resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>02/02/2022</u>.</p> <p> CHAIRMAN</p>
	02.02.2022	<p>Junior of learned counsel for the appellant present. Preliminary arguments could not be heard due to learned Member (Executive) Mian Muhammad is on leave. To come up for preliminary hearing on 23.02.2022 before S.B.</p> <p> Reader</p>

The appeal of Mst. Rashida Akhtar PSHT GGCMS, Nara Kala Khan Lakki Marwat received today i.e. on 27.01.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

1. Appeal has not been flagged/marked with annexures marks.
2. Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 186 /S.T,

Dt. 27/01 /2022


REGISTRAR
+10 SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Arif Jan Afridi Adv. Pesh.

Sir,

Re-submitted after receiving
all objections



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 129 / 2022

Rashida Akhtar

versus

DEO & Others

INDEX

S. No	Documents	Annex	P. No.
1.	Memo of Appeal		1-3
2.	A. No. 865/18 along with annexures	"A"	4-16
3.	Impugned transfer order dated 26-11-2021	"B"	17
4.	Representation dated 15-11-2021	"C"	18
5.	Application for Interim Relief		19-20

Mutamad

15/12

15/11

[Signature]

Through

Appellant

[Signature]

Saadullah Khan Marwat
Advocate.
21-A Nasir Mansion,
Shoba Bazaar, Peshawar.
Ph: 0300-5872676
0311-9266609

Dated: 26-01-2022

Mutamad

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. _____/2022

Khyber Pakhtunkhwa
Service Tribunal

Case No. 118

27-01-2022

Rashida Akhtar W/O Zafar Iqbal,
PSHT, GGCMS, Nara Kala Khan,
Lakki Marwat Appellant

VERSUS

1. District Education Officer (F)
Lakki Marwat.
2. Director, Elementary &
Secondary Education
Department, Peshawar.
3. Secretary, Govt. of KP,
Elementary & Secondary
Education Department,
Peshawar. Respondents

⇄<=>⇄<=>⇄<=>⇄<=>⇄

Filed to-day

Registrar

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST OFFICE ORDER NO. 5509-16 DATED 26-
10-2021 OF R. NO. 01, WHEREBY AT S. NO. 12
APPELLANT WAS TRANSFERRED FROM GGCMS
NARK ALA KHAN TO GGPS AZAL MIR BETTANI FOR
NO LEGAL REASON:

⇄<=>⇄<=>⇄<=>⇄<=>⇄

Respectfully Sheweth;

1. That prior to filing of the appeal in hand, appellant has filed appeal No. 865/2018 before this hon'ble Tribunal against the then transfer order dated 14-03-2018, however the same was withdrawn on 09-12-2019 by restoring appellant to her original post at GGPS Nar Kala Khan. (Copy of appeal along with annexures as annex "A")

2. That on 26-10-2021, R. No. 01 again issued transfer order of appellant at S. No. 12 along with others and she was transferred from GGCMS Nar Kala Khan to GGPS Azal Mir Battani which school is 70 miles away from her village. (Copy as annex "B")
3. That on 15-11-2021, appellant submitted representation for cancellation of the impugned order but in vain. (Copy as annex "C")

Hence this appeal, Inter alia on the following grounds:-

GROUND

- a. That appellant was transferred time and again in short Spain period for no legal reason but due to malafide of R. No. 01.
- b. That the impugned order dated 26-10-2021 was made on the reason that the teachers concerned were working on wrong posts against actual posts but in this order too appellant was shown as PSHT B-15, while in the earlier orders, she was also shown PSHT B-15 as per order dated 01-03-2013.
- c. That being domestic female, appellant was transferred to far-plang area of 70 miles and that too in FR, so such order is against the law and union based policy.
- d. That the reason advanced in the impugned order is of no avail to the respondents as prior to the same, she was working in B-15 and not in low grade.
- e. That the post at GGCMS Nar kala Khan is still lying vacant till date. The impugned order was neither in the interest of public nor in the interest of department.

It is, therefore, most humbly prayed that on acceptance of the appeal, office order dated 26-10-2021 of R. No. 01 be set aside and appellant be restored to her original school GGCMS Nar Kala Khan with all service benefits.

ide.

Appellant:

Through

Saadullah Khan Marwat

Saadullah Khan Marwat

Arbab Saiful Kamal

Arbab Saiful Kamal

Amjad Nawaz

Amjad Nawaz

Advocates

Dated: 26-01-2021

CERTIFICATE:

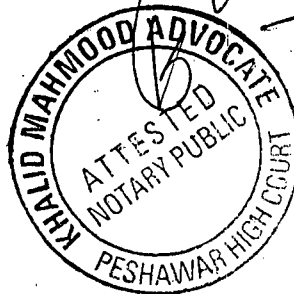
As per instructions of my client, Service Appeal No. 865/18 has earlier been filed by the appellant before this Hon'ble Tribunal.

Saadullah Khan

Advocate

AFFIDAVIT

I, Rashida Akhtar W/O Zafar Iqbal, PSHT, GGCMS, Nar Kala Khan (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



ide.

DEPONENT

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 865 /2018

Rashida Akhtar, W/O Zafar Iqbal,
PSHT, GGCMS, Nar Kala Khan,
Lakki Marwat Appellant

VERSUS

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 1128

Dated 06-7-2018

1. District Education Officer (F),
Lakki Marwat.
2. Director, Elementary & Secondary
Education, KP, Peshawar.
3. Secretary, Elementary & Secondary
Education, KP, Peshawar Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST OFFICER ORDER NO. 1737-40 DATED 14-
03-2018 OF R. NO. 01, WHEREBY APPELLANT WAS
TRANSFERRED GGCMS, NAR KALA KHAN TO GGPS
SHAGI GHULAM RASOOL BEING SURPLUS:

ATTESTED

Med-to-day
[Signature]
Registrar

⇔<=>⇔<=>⇔<=>⇔<=>⇔

[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Respectfully Sheweth;

2/H.

1. That appellant was appointed as PTC teacher on 10-01-1993 and was posted as GGPS Baz Kaly.
2. That after completion of the normal tenure at the said school, appellant was transferred and posted at GGPS Nar Sahib Khan, then to GGPS Sardari Kala, to GGPS Utham Garh to GGPS Wali Khan Maidad Khel and finally to GGPS Nar Kala Khan.
3. That on 07-12-2016, appellant was transferred from GGCMS, Nar Kala Khan to GGPS Amir Nawaz Tajori by R. No. 01 regarding general transfer and posting order but such order was not

[Signature]

5

materialized as she was directed to perform her duty at the said school, GGCMS Nar Kala Khan, GGPS Amir Nawaz Tajori was far away of about 60 km from her UC, Marmandi Azeem. (Copy as annex "A")

4. That on 14-03-2018, R. No. 01 issued another order of transfer, whereby at S. No. 03, appellant was transferred from GGCMS, Nar Kala Khan to GGPS Shagi Ghulam Rasool, being surplus. (Copy as annex "B")
5. That on 26-03-2018, appellant submitted departmental appeal before R. No. 01 for cancellation of order dated 14-03-2018, which met dead response till date. (Copy as annex "C")


Hence this appeal, inter alia, on the following grounds:

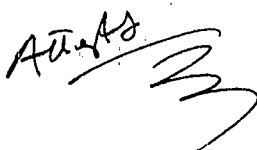
GROUND S:

- a. That no complaint ever exists against appellant in performance of her official duty. Her performance was highly appreciated by the superiors.
- b. That during short span of time, repeated transfer orders were issued by the then DEO (F) for no legal reasons but for her ulterior motive to mint money.
- c. That apex Supreme Court of Pakistan condemned successive transfers rather appreciated to not honor the same because repeated transfer transfers reduces faith, confidence, efficiency and performance of a servant.
- d. That verbal political pressure was exerted over the authorities, so such orders were made time and again not in the interest of public but in the interest of incumbents. The said repeated transfer orders are based on malafide.
- e. That SDEO (F) Serai Naurang and ASDEO Mehru Nisa plays vital role in transfer and posting for their benefits as stated above.

ATTESTED

That the said transfer orders are against the law and policy on the subject, so requires interference.


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



It is, therefore, most humbly prayed that on acceptance of appeal, order dated 14-03-2018 to the extent of appellant at S. No. 03 be set aside and appellant be posted at GGCMS Nar Kala Khan with all service benefits, with such other relief as may be deemed proper and just in circumstances of the case.

[Signature]
Appellant

Through

[Signature]
Saadullah Khan Marwat

[Signature]
Amjad Nawaz
Advocates.

Dated 03-07-2018

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

Date of Presentation of Application 30-7-18
Number of Words 1200
Copying Fee 8-
Urgent 2-
Total 10-
Name of Copyist *[Signature]*
Date of Completion of Copy 30-7-18
Date of Delivery of Copy 30-7-18

[Signature]

7

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT

OFFICE ORDER

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1/18/E&SE/2012, the following Primary School Teachers PST-B-12 are hereby promoted to the post of Senior Primary School Teachers SPST B-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further posted in the schools noted against each:-

S.NO	NAME	PRESENT SCHOOL	PLACE OF POSTING
1.	HAMIDA BEGUM	GGPS SUGAR MILL MAMA KHEL	GGPS SUGAR MILL MAMA KHEL
2.	NASRIN NIAZI	GGPS NAR MUHAMAMD KHAN KUNDI	GGPS NAR MUHAMAMD KHAN KUNDI
3.	ROSHAN AKHTER	GGPS NAR AZAD CHANDO KHEL	GGPS NAR AZAD CHANDO KHEL
4.	ZAREEN TAJ IQBAL	GGPS MAMA KHEL MARWAT NO. 1	GGPS MAMA KHEL MARWAT NO. 1
5.	NASRIN BEGUM	GGPS MAMA KHEL MARWAT NO.1	GGPS MAMA KHEL MARWAT NO.1
6.	SHAH BEGUM	GGPS ISAK KHEL	GGPS ISAK KHEL
7.	BIBI AMINA	GGPS SYED KHEL	GGPS SYED KHEL
8.	GUL REHANA	GGPS SHAHBAZ KHEL	GGPS SHAHBAZ KHEL
9.	GUL SHAD BIBI	GGPS DAULAT KHEL NO.2	GGPS DAULAT KHEL NO.2
10.	YASMIN BIBI	GGPS KOTKA SHER JAN ABAD	GGPS KOTKA SHER JAN ABAD
11.	BIBI SAFIA	GGPS HAQ DAD ABAD NO.2	GGPS HAQ DAD ABAD NO.2
12.	HUKAM JANA	GGPS NO. 2 MATORA	GGPS NO. 2 MATORA
13.	SHAMSHAD BEGUM	GGPS DARA PEZU	GGPS DARA PEZU
14.	RIZWANA SHAHEEN	GGPS LAKKI MINA KHEL	GGPS LAKKI MINA KHEL
15.	RAHEEMA BIBI	GGPS KAKA KHEL NO.1	GGPS KAKA KHEL NO.1
16.	ZUBAIDA KHATOON	GGPS HAMID ABAD LAKKI	GGPS HAMID ABAD LAKKI
17.	MUGI M BIBI	GGPS MUHAMMAD HASSAN S KHEL	GGPS MUHAMMAD HASSAN S KHEL
18.	GULZAR BIBI	GGPS SHAHBAZ KHEL	GGPS ALAWAL KHEL
19.	NAJMA SAHAR	GGPS KOTKA SHER ASLAM	GGPS KOTKA SHER ASLAM
20.	DILSHAD BIBI	GGPS KOTKA MADAT	GGPS KOTKA MADAT
21.	FARIDA AKHTER	GGPS KOTKA MUHAMMAD NAWAZ GHAZNI KHEL	GGPS KOTKA MUHAMMAD NAWAZ GHAZNI KHEL
22.	NASIM BIBI	GGPS SARDAR MAIDAD KHEL	GGPS SARDAR MAIDAD KHEL
23.	UMAR JANA	GGPS DARA PEZU	GGPS KHERU KHEL PACCA NO.3
24.	ZARIN TAJ KHALID	GGPS MAMA KHEL MARWAT NO. 1	GGPS GAMBILA ABDUR RAZAQ
25.	SAFIA BIBI	GGPS NAR SAHIBZADA KHOST	GGPS NAR SAHIBZADA KHOST
26.	ASMA SHAHEEN	GGPS GOURAKA DILASA SHAH	GGPS GOURAKA DILASA SHAH
27.	MEHR U NISA	GGPS KALA MANJIWALA	GGPS KALA MANJIWALA
28.	SAEEDA BANO	GGPS KOTKA BAKHTIAR KHAWAJ KHEL	GGPS KOTKA BAKHTIAR KHAWAJ KHEL
29.	JEHAN ARA	GGPS DARA PEZU	KHERU KHEL PACCA NO.3

Handwritten signature

0333-9044278 - 0345-9858593
 تالیسی کلر اینڈ مانیجر و فوٹو اسٹیٹس سروسز
 مارواٹ لاکھی

30.	ULFAT JAHAN	GGCMS DALLO KHEL	GGPS TOOR LAWANG KHEL NO.2
31.	ZAREEN TAJ	GGPS WANDA ORANG ZIB	GGPS WANDA ORANG ZIB
32.	FAIRZANA KOUSAR	GGPS WAZIR KILA	GGPS WAZIR KILA
33.	JAMSHAD BEGUM	GGPS KHOIDAD KHEL LAKKI	GGPS KHOIDAD KHEL LAKKI
34.	KALSOOM AKHTAR	GGPS DALLO KHEL NO. 1	GGPS ATTASHI MICHAN KHEL
35.	NASIM AKHTAR	GGPS WANDA PAINDA KHAN	GGPS WANDA PAINDA KHAN
36.	ZAHIDA NASRIN	GGPS WANDA BANOCHI	GGPS WANDA BANOCHI
37.	SAMINA NAZ	GGPS KAKI JAN	GGPS KAKI JAN
38.	ZAIB U NISA	GGPS PASSANI AYAZ KHAN	GGPS PASSANI AYAZ KHAN
39.	ANWAR SULTANA	GGPS KOTKA ZARWALI KHAN	GGPS KOTKA ZARWALI KHAN
	MARJEN	NAR SIKANDER KHAN	GGPS NAR SIKANDER KHAN
41.		BAKHMAL AHMADZAI	GGPS NAR BAKHMAL AHMADZAI
42.	MAHJABEEN	GGPS KOTKA SHER JAN	GGPS BICHKAN AHMAD ZAI
43.	GULZAR BIBI	GGPS MELA SHAHAB KHEL	GGPS MELA SHAHAB KHEL
44.		GGPS BAIST, KHEL NO.1	GGPS BAIST KHEL NO.1
45.	SHAMIM AKHTER	GGPS SARDAR MAIDAD KHEL	GGPS ABDUR RAHIM GHAZNI KHEL NO.2
46.	NISHAT PERVEEN	GGPS DAULAT MIR LAWANG KHEL	GGPS DAULAT MIR LAWANG KHEL
47.	NOOR NISA	GGPS NAR HAKIM KHAN	GGPS NAR HAKIM KHAN
48.	MEHER U NISA	GGPS GUL AKHTAR	GGPS GUL AKHTAR
49.	BAKHMALA BIBI	GGPS SHAHBAZ KHEL	GGPS TABI MURAD NO.1
50.	YASMIN BIBI	GGPS MAMA KHEL MARWAT NO. 2	GGPS NASER KHEL NO.1
51.	SYDA HUSAN NISA	GGPS HAMID ABAD	GGPS HAMID ABAD
52.	THMINA ANJUM	GGPS TOTI ABAD	GGPS TOTI ABAD
53.	SHAMSHAD BEGUM	GGPS HAMID ABAD	GGPS AMIN JABU KHEL
54.	ROBINA JABEN	GGPS GAMBILA WALAYAT SHAH	GGPS GAMBILA WALAYAT SHAH
55.	ABIDA NASIR	GGPS KOTKA SHAR ASLAM	GGPS NAR RAZA KHAN ADAMZAI
56.	BIBI TAHIRA	GGPS FAQIR MASOOM	GGPS FAQIR MASOOM
57.	MUKHTIAR BEGUM	GGCMS WANDA AMIR	GGPS WANDA AMIR NO.2
58.	GUL ANWAR BIBI	GGPS ZARE MALA KHEL	GGPS ZARE MALA KHEL
59.	KALSOOM BEGUM	GGPS FATEH KHAN JANOBI	GGPS FATEH KHAN JANOBI
60.	NUSRAT RAUF	GGPS MIR ALAM MANJIWALA	GGPS MIR ALAM MANJIWALA
61.	NAHID AKHTER	GGPS TATTA BASHI KHEL	GGPS TATTA BASHI KHEL
62.	BIBI AMINA	GGPS LANGER KHEL HATI KHAN	GGPS QHODA
63.	RUKHSANA BEGUM	GGPS SHERI AZ KHEL	GGPS SHERI KHEL
64.	JAN BANO	GGPS BAZ KILA	GGPS BAZ KILA
65.	SHAHANA ANJAM	GGPS LAKKI MINA KHEL	GGPS SHAH HASSAN KHEL
66.	ZAITOON BIBI	GGPS AHMAD ABAD LAKKI	GGPS AHMAD ABAD LAKKI
67.	PERVEN AKHTER	GGPS SARGA KHERO KHEL	GGPS SARGA KHERO KHEL
68.	FARIDA KHANUM	GGPS PAHAR KHEL THALI NO.1	GGPS GANDI QAMAR ZAMAN
69.	SHAFQAT PERVEEN	GGPS BHANA MANJIWALA	GGPS BHANA MANJIWALA
70.	HAMEEDA BEGUM	GGPS SHAH ALAM TITTER KHEL	GGPS JABU KHEL
71.	KHAT NAZ	GGPS NAR AZAD CHANDU KHEL	GGPS NAR AYAZ WAZA

33-9044278 - 0345-9858593 سہیل
 تالی کلر اینڈ مانیجر و فوٹو سٹیٹسٹس
 محلہ ہاں 9th مارچ 2017ء
 بلاک کنگ کورٹس، ڈیڑھ سائیکل سٹاپ سٹارڈ
 گلشن شاہین کارڈ اور پورٹل سٹریٹ
 لاہور۔

ATTESTED

Handwritten signature

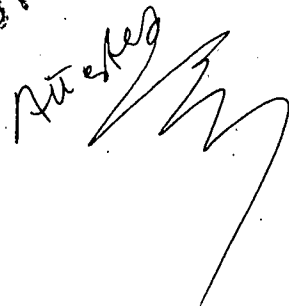
72.	SHAMIM AKHTER	GGPS MUHAMMAD HASSAN S.KHEL	GGPS TABBI MURAD NO.3
73.	RIZWANA BIBI	GGPS TITTER KHEL NO. 1	GGPS TITTER KHEL NO. 1
74.	NAILA TABASSUM	GGPS WANDA KALAN	GGPS WANDA SHAH MADU
75.	TOTTI JANA	GGPS DARAZ REZU	GGPS PAHAR KHEL PACCA NO:2
76.	YASMIN AKHTAR	GGPS KOTKA ATLAS KHAN	GGPS KOTKA ATLAS KHAN
77.	RASHMINA BIBI	GGPS NAR BAKHMAL AHMADZAI	GGPS ZAFAR MAMA KHEL
78.	ROSHAN TAJ	GGPS NAR SHAR JAN ABAD	GGPS TABASSUM MICHN KHEL
79.	HUSAN BANO	GGCMS LANGER KHEL MASTI KHAN	GGPS MASTI KHEL
80.	MUSARRAT PERVEEN	GGPS LAKKI MINA KHEL	GGPS UMER ABAD
81.	YASMIN BIBI	GGPS TEXTILE MILLS	GGPS TEXTILE MILLS
82.	NISHAD BIBI	GGPS LANGER KHEL HINDAL	GGPS LANGER KHEL HINDAL
83.	ZARIN TAJ	GGCMS NAR URAM GHARH	GGPS BACHKAN AHMAD ZAI
84.	AMINA BEGUM	GGPS SYED KHEL	GGPS DABAK MANDARA KHEL NO. 1
85.	BUSHRA BEGUM	GGPS HAYAT KHEL	GGPS HAYAT KHEL
86.	SHAMSHAD BEGUM	GGPS BILAND KHEL	GGPS BILAND KHEL
87.	NUSRAT BIBI	GGPS KUNDAL CHOWNI	GGPS WANDA KHARA
88.	SAMIN BEGUM	GGPS AHMAD ZIA AYAZ KHAN	GGPS AHMAD ZIA AYAZ KHAN
89.	SHAKILA JAMSHAD	GGCMS KOTKA ZAR WALI KHAN	GGPS ALAM KHAN PASSANI
90.	ZAKRA BIBI	GGSP-HAQDAD ABAD NO.2	GGPS MELA MANDRA KHEL NO. 1
91.	UMA SALMA	GGCMS DALLO KHEL	GGPS KOTKA MIR-ABBAS KALAN
92.	ZAKRA BIBI	GGPS MITO GHAZNI KHEL NO. 2	GGPS MITO GHAZNI KHEL NO. 2
93.	ZAKIA BIBI	GGPS KUNDAL CHOWNI	GGPS KUNDAL CHOWNI
94.	BIBI HALIMA	GGPS SYED KHEL	GGPS DALWATI NO:2
95.	PERVEEN AKHTER	GGPS SHAH ALAM TITTER KHEL	GGPS SHAH ALAM TITTER KHEL
96.	FARZANA YASMIN	GGPS IHSAN PUR NO.2	GGPS IHSAN PUR NO.2
97.	RAHILA	GGPS MUHAMMAD HASSAN SHAHGAZ KHEL	GGPS JANG KHEL NO.1
98.	JAFIAT BIBI	GGPS ANWAR KILLA	GGPS ANWAR KILLA
99.	AKHTER UNISA	GGPS WANDA JOGI	GGPS WANDA JOGI
100.	SHAHNAZ BEGUM	GGPS MUGHAL MANJIWALA	GGPS MUGHAL MANJIWALA
101.	HAMIDA BEGUM	GGPS FAQIRAN SHERI KHEL	GGPS FAQIRAN SHERI KHEL
102.	FUHMIDA KHANAM	GGPS MAIRMANDI MULTAN	GGPS MAIRMANDI MULTAN
103.	HUSAN PARI	GGPS MITO GHAZNI KHEL	GGPS MITO GHAZNI KHEL
104.	GUL PERVEEN	GGPS LANDIWAH NABI SHAH	GGPS LANDIWAH NABI SHAH
105.	ZARIN TAJ	GGPS NAR SHANDEK KHAN	GGPS TARKHA BAZI KHEL No.2
106.	ISLAM BIBI	GGPS HAYAT KHEL	GGPS SAMANDER TITTER KHEL
107.	NUSRAT-SHAHEEN	GGPS NAQIBULLAH TAJORI	GGPS NAQIBULLAH TAJORI
108.	ISLAM BIBI	GGPS ACHU KHEL	GGPS ACHU KHEL
109.	RAHEM BIBI	GGPS NAR SULTAN MEHMOOD	GGPS NAR SULTAN MEHMOOD
110.	ALTAF BEGUM	GGPS AKBAR KILLA	GGPS SADAR ABAD CHAZI KHEL
111.	SHAKILA AKHATEF	GGCMS FARID TITTER KHEL	GGPS GANDI KHAN KHEL NO.2
112.	ZINAT ARA	GGPS NAR SAHIB ZADA KHOSR	GGPS SOHRAH SING
113.	YASMIN AKHTER	GGPS SOHRAH SING	GGPS SOHRAH SING

Handwritten signature

20


5

114.	FAZILAT	GGPS GUL WALI ABAD	GGPS MASH HABIB ULLAH
115.	BIBI HALIMA	GGPS LANGER KHEL HINDAL NO.2	GGPS GUL BAZ DEHQAN
116.	ZAHID NISA	GGPS GANDI SAHIB KHAN NASER KHEL NO.2	GGPS GANDI SAHIB KHAN NASER KHEL NO.2
117.	SHAMIM AKHTER	GGPS DAULAT KHEL NO.2	GGPS DAULAT KHEL NO.1
118.	MUMTAZ BEGUM	GGPS KARIM JAN BEGU KHEL	GGPS KARIM JAN BEGU KHEL
119.	BIBI SAFIA	GGPS NAR SAHIBZADA KHOST	GGPS NAR SARKORI
120.	SHAHIDA BIBI	GGPS MANGALA NO.1	GGPS MANGALA NO.1
121.	FARZANA AKHTAR	GGPS S/NAURANG	GGPS S/NAURANG
122.	ZUBAIDA	GGPS S/BAKIMAL AHMADZAI	GGPS S/BAKIMAL AHMADZAI
123.	NASIM BIBI	GGPS NAR UTAM GHARH	GGPS GANDI QAMAR ZAMAN
124.	SHAHIDA PERVEEN	GGPS NAR ABU SAMAND BEGU KHEL	GGPS NAR ABU SAMAND BEGU KHEL
125.	KALSOOM AKHTER	GGPS LANGER KHEL HINDAL NO.2	GGPS LANGER KHEL HINDAL NO.2
126.	NAHIDA	GGPS MAMA KHEL MARWAT NO. 2	GGPS MAMA KHEL MARWAT NO. 2
127.	ROBINA SHAHEEN	GGPS MUHAMMAD JAN LANDIWA.	GGPS MUHAMMAD JAN LANDIWAH
128.	NOOR SHAHIDA AYUB	GGPS SAEED KHEL	GGPS ABBASA WAZIR
129.	FEHMIDA BEGUM	GGPS LANGER KHEL PACCA NO.1	GGPS LANGER KHEL PACCA NO.1
130.	FOZIA NAZ	GGPS KOTKA MUHAMMAD NAWAZ TAJAZAI	GGPS KOTKA MUHAMMAD NAWAZ TAJAZAI
✓	ASHIDA AKHTER	GGCMS NAR KALA KHAN	GGCMS NAR KALA KHAN
131.	ISLAM BIBI	GGPS LANGER KHEL HINDAL NO.1	GGPS TOOR LANWANG KHEL NO.2
133.	SHAMIM AKHTER	GGPS WANDA ARSALA	GGPS WANDA ARSALA
134.	SHAHNAZ BEGUM	GGPS KOTKA ATLAS KHAN	GGPS NAR GUL HASSAN SHAH
135.	NAJMA SEHAN	GGPS AZAL MIR BHITANNI	GGPS AZAL MIR BHITANNI
136.	YASMIN BEGUM	GGPS KAKKI JAN	GGPS WANDA NAURANG
137.	RUKHSANA SAFDER	GGPS AKBER KILA	GGPS KOTKA AHMAD KHAN
138.	NOSHAD BIBI	GGPS DALLO KHEL NO. 1	GGPS BEGA TAJA ZAI
139.	AZRA BIBI	GGPS SERAI NAURANG	GGPS BRAGI
140.	SAMINA HABIB	GGPS DARA EZU	GGPS KHERU KHEL PACCA NO.1
141.	REHAN YASMIN	GGPS SERAI NAURANG	GGPS KOTKA GUL HAWAS
142.	SHAGI FTA BEGUM	GGPS UMER TITTER KHEL	GGPS UMER TITTER KHEL
143.	NAHEED AKHTAR	GGPS MINA KHEL	GGPS KATA KHEL
144.	SHEER NAZ AKHTAR	GGPS MINA KHEL	GGPS AGGA KHEL NO.2
145.	NASIRIN BEGUM	GGPS GHAZI KHEL NO.2	GGPS GHAZI KHEL NO.2
146.	ROBINA NISA	GGPS DALLO KHEL NO. 1	GGPS KIRWAJA KHEL
147.	BUSARA FATIMA	GGPS HAYAT KHEL	GGPS CHAHAR KHEL
148.	NAJMA SHAHEEN	GGPS HAQDAL ABAD NO.1	GGPS HANADABAD NO.1
149.	SAMINA ALAM	GGCMS WAND. AMIR	GGPS KHANSAWRAN
150.	SAMINA NAZ	GGPS SHAGI GULAM FASOOL	GGPS SHAGI GULAM FASOOL
151.	K. URSHID BEGUM	GGPS DARA BEGU	GGPS PAHAR KHEL PACCA NO.1
152.	K. ALSOOM AKHTAR	GGPS WAND. AMIR	GGPS HARANA TALA WAKIL
153.	FEHMIDA NASREEN	GGPS MIR QALAM HARAMA TALA	GGPS MIR QALAM HARAMA TALA
154.	IAHID AKHTER	GGPS NO. 1 AUBA KHEL	GGPS NO. 1 AUBA KHEL
155.	ZUBAIDA BEGUM	GGPS KOTKA KASIMIR	GGPS KOTKA KASIMIR

ATTESTED
Attested


136

156.	ROBINA SHAHEEN	GGCMS WANDA AMIR	GGPS BEGU KHEL NO. 1
157.	BALQEES KHANUM	GGPS KHOIDAD KHEL	GGPS QEEMAT MANJIWALA
158.	HAMIDA BEGUM	GGPS AGARI KHANZAD KHEL	GGPS AGARI KHANZAD KHEL
159.	ULFAT JAHAN	GGPS NO. 1 WANDA SHAHAD KHEL NO. 1	GGPS NO. 1 WANDA SHAHAD KHEL NO. 1
160.	ASHRAF U NISA	GGPS KALA MANJIWALA	GGPS AZAM BAIST KHEL
161.	IRSHAD BEGUM	GGPS MOSAM ADAMZAI	GGPS KHUSH DIL ADAMZAI
162.	SADR-UN-NISA	GGPS GHAZNI KHEL NO.1	GGPS SHER AFZAL GHAZNI KHEL
163.	ZAIB UN NISA	GGPS MARMANDI AZIM	GGPS MARMANDI AZIM
164.	BIBI SAJIDA	GGPS NAR MUHAMMAD KHAN KUNDI	GGPS ABDULLAH KHAN BHITANNI
165.	FARIDA BIBI	GGPS MANGALA NO.1	GGPS MANGALA NO.2
166.	MEHR U NISA	GGPS LANGER KHEL PACCA NO.2	GGPS LANGER KHEL PACCA NO.2
167.	FARHAT JABIN	GGPS MELA MANDRA KHEL NO. 2	GGPS MELA MANDRA KHEL NO. 2
168.	NARGAS GUL	GGPS YASIN MANJIWALA	GGPS YASIN MANJIWALA
169.	ROBINA SHAHEEN	GGPS NO.3 ABBA KHEL	GGPS NO.3 ABBA KHEL
170.	KHURSHID AHMAD	GGPS NAR SAHIB DAD MAIDAD KHEL	GGPS NAR SAHIB DAD MAIDAD KHEL
171.	ABIDA KHATOON	GGPS DALLO KHEL NO. 1	GGPS MIR AZAM MICHAN KHEL
172.	SAKINA BIBI	GGPS SARDARI KILA	GGPS SARDARI KILA
173.	ALIA SHAN	GGPS KOTKA ATLAS KHAN	GGPS DARAKI ALAMSHAH KHEL
174.	NASIM AKHTER	GGPS FATEH KHAN JANOBI	GGPS AGHA WOZA
175.	TAJ WARA BIBI	GGPS MULTAN MANJIWALA	GGPS MULTAN MANJIWALA
176.	BIBI RUQIA	GGPS SAEED KHEL	GGPS MIR WALI SURBAND
177.	RAZIA SULTANA	GGCMS NAR UTAM GHARI	GGPS TAJORI NO.1
178.	KHADIJA BIBI	GGPS SARDARI KILA	GGPS NAR MUHAMMAD GHAZNI KHEL
179.	SHAFQAT NOORIN	GGPS MUGHAL MANJIWALA	GGPS NAR KHUDA BAKHSH
180.	DILSHAD YASMIN	GGPS QURESHI ADAMZAI	GGPS QURESHI ADAMZAI
181.	SHAHEEN AKHTER	GGPS AKBAR KILA	GGPS AMIN JABU KHEL
182.	ULFAT SHAHEEN	GGPS MIR WALI SURBAND NO.2	GGPS MIR WALI SURBAND NO.2
183.	SHAHIDA PERVEEN	GGPS TABBII MURAD NO.2	GGPS TABBII MURAD NO.2
184.	SHAHIDA BIBI	GGPS LAKKI MINA KHEL	GGPS DALWATI NO.1
185.	ROBINA SHAHEEN	GGPS KOTKA ATLAS KHAN	GGPS NAR SAHIB KHAN
186.	HASINA BIBI	GGPS NAWER KHEL	GGPS NAWER KHEL
187.	ZARAJ BEGUM	GGPS DALLO KHEL NO.1	GGPS KAKA KHEL NO.2
188.	SHAHIDA PERVEEN	GGPS ABDUL KHEL	GGPS ABDUL KHEL
189.	NUZHAT SHAHEEN	GGPS LANGER KHEL HINDAL NO.2	GGPS MELA MANDRA KHEL NO.3
190.	KISHWAR	GGPS UMER TITTER KHEL	GGPS MASHA MANSOOR NO.2
191.	KHALIDA SHAHEEN	GGPS WIKALAN	GGPS WIKALAN
192.	SHAZIA PERVEEN	GGPS HAMID ABAD LAKKI	GGPS IHSAN PUR NO.1
193.	NARGIS JABEEN	GGPS TOTI ABAD	GGPS WANDA SIMU
194.	TOSHIBA KIRAN	GGPS HAMID ABAD LAKKI	GGPS ZANGI KHEL NO. 2
195.	KHURSHID TALAT	GGPS NAR SAHIBZADA KHICST	GGPS SHAMONI KHATTAK NO.2
196.	NASEEM BIBI	GGPS NO.2 HAQQAD ABAD	GGPS WANDA SHAHAB KHEL NO.4

Attaf


12

6

197.	QASER PERVEEN	GGPS KOTKA GIDAR	GGPS KOTKA GIDAR
198.	AKHTER UN NISA	GGPS NAR ABU SAMAND BEGU KHEL	GGPS KOTKA TAJ ALI KHAN
199.	SHERIN TAJ	GGPS MAMA KHEL MARWAT NO. 2	GGPS SARKATI MICHEN KHEL
200.	NAJMU NISA	GGPS DALLO KHEL NO.1	GGPS DALLO KHEL NO.1
201.	SAFINA SAIF	GGPS SHEHBAZ KHEL	GGPS JANG KHEL NO.2
202.	PERVEEN AKHTAR	GGPS TAJAZAI NO.2	GGPS TAJAZAI NO.2
203.	NAHIDA BIBI	GGPS SARFRAZ LANDAKA	GGPS SARFRAZ LANDAKA
204.	AKHTAR BIBI	GGCMS LAND AHMAD KHEL	GGCMS LAND AHMAD KHEL
205.	SAFINA NAZ	GGPS KOTKA KAKKI JAN	GGPS SHAH TORA TAKHTI KHEL
206.	SHAGUFTA YASMIN	GGPS KHERO KHEL NO. 4	GGPS KHERO KHEL NO.4
207.	SHAHIDA KHATOON	GGPS KOTKA BUKHAR	GGPS SARA GHUNDA
208.	SALMA NOREEN	GGPS DADAK MANDRA KHEL NO.2	GGPS DADAK MANDRA KHEL NO.2
209.	SAJIDA BIBI	GGPS KALA MANJIWALA	GGPS GHULAM ALI SAMMTI
210.	NASIM AKHTER	GGPS FATEH KHAN JANOBI	GGPS AGZA UZA
211.	SHAZIA KHANUM	GGPS SARFRAZ LANDAKA	GGPS KOTKA SHARIF
212.	RUKHSANA BEGUM	GGPS SHAKH QULI KHAN NO.2	GGPS SHAKH QULI KHAN NO.2
213.	HASHIM BIBI	GGPS KOTKA MEHMOOD	GGPS KOTKA MEHMOOD
214.	NAHID AKHTER	GGPS KOTKA SALIM KHAN	GGPS KOTKA SALIM KHAN
215.	ZINAT BIBI	GGPS SAMAND ADAMZAI	GGPS SAMAND ADAMZAI
216.	SARTAJ	GGPS HAMID ABAD	GGPS WANDA LANGER KHEL
217.	SHAKILA SHAHEEN	GGPS SAEED KHEL	GGPS GATI MICHEN KHEL
218.	JEHAN ARA BEGUM	GGPS MARMANDI MULTAN	GGPS DAKHLI NAR MUHAMMAD GHAZNI KHEL
219.	SHAHIDA PERVEEN	GGCMS ABBA KHEL	GGCMS ABBA KHEL
220.	YASMEEN AKHTAR	GGPS SUGAR MILL	GGPS KOTKA MEHMOOD NO.2
221.	PERVEEN AKHTAR	GGPS WANDA NOMAN	GGPS WANDA NOMAN
222.	RIZWANA BIBI	GGPS SYED KHEL	GGPS SYED KHEL NO.2
223.	SHAZIA NAWAZ	GGPS GUL AKHTER GHAZNI KHEL NO.3	GGPS GUL AKHTER GHAZNI KHEL NO.3
224.	NAHEED AKHTAR	GGPS HAQDAD ABAD NO.1	GGPS WANA NIZAMI
225.	KHER UN NISA	GGPS KOTKA KAKI JAN	GGPS TARKHA BAZI KHEL NO.1
226.	SAFIA NOORIN	GGPS LANGER KHEL HINDAL NO.2	GGPS TAJAZAI NO.1
227.	JAMILA SHABNUM	GGPS KHOIDAD KHEL LAKKI	GGPS PAHAR KHEL THALL NO.2
228.	SHAMSHAD BEGUM	GGPS RAILWAY JUNCTION	GGPS ZER JANU
229.	JEHAN ARA	GGPS TOTI ABAD LAKKI	GGPS PAHAR KHEL THAI. NO. 1
230.	JAMILA BIBI	GGPS SHAHBAZ KHEL	GGPS JANG KHEL NO.4
231.	YASMIN BIBI	GGPS LANGER MAIDAD KHEL	GGPS LANGER MAIDAD KHEL
232.	SAFIA BEGUM	GGPS TOTI ABAD	GGPS NAWAR KHEL
233.	ULFAT BIBI	GGPS NO. 6 GHAZNI KHEL	GGPS NO. 6 GHAZNI KHEL
234.	SUGHRA BIBI	GGPS KHOIDAD KHEL	GGPS WANDA KUTANA
235.	BIBI RUQIA	GGPS SARWAR MAMA KHEL	GGPS SARWAR MAMA KHEL
236.	SHAGUFTA JAMEN	GGPS NO. 6 GHAZNI KHEL	GGPS GHAZNI KHEL NO.5
237.	NASEEM AKHTAR	GGPS HAYAT KHEL	GGPS MADANI KHEL
238.	BIBI JAMILA	GGPS DARA PEJU	GGPS KHERU KHEL PACCA NO.2

Govt. of Punjab
Ministry of Education
Karachi

ATTESTED

Handwritten signature

13

239.	SAEEDA BIBI	GGPS GHULAM ALI SAMTI	GGPS AKHTO JAN BHITANNI
240.	NIGHAT SHAHEEN	GGPS TOTI ABAD	GGPS AHMAD KHEL
241.	ZAINAB BIBI	GGCMS FARID KHAN TITTER KHEL	GGPS WANDA BARKHI
242.	FAIZA GUL	GGPS GHAZNI KHEL NO.1	GGPS GHAZNI KHEL NO.1
243.	NAWAB BIBI	GGCMS FATEH KHAN SHUMALI	GGCMS FATEH KHAN SHUMALI
244.	NIGHAT JABEEN	GGPS BEGA TAJAZAI NO.2	GGPS BEGA TAJAZAI NO.2
245.	ZAINAB BIBI	GGPS GUL WALI ABAD	GGPS KECHI KAMAR
246.	RAZIA BIBI	GGPS GUL WALI ABAD	GGPS GUL WALI ABAD
247.	NASEEM BIBI	GGPS KOTKA ZARWALI	GGPS BAKHMAL AHMAD ZAI MAMTAZ
248.	SHABNUM SHAHEEN	GGPS SHERDULLAH JAN LANDIWAH	GGPS SHERDULLAH JAN LANDIWAH
249.	KAUSER SAMINA	GGPS MATORA NO.2	GGPS MATORA NO.2
250.	KHATOON BIBI	GGPS ZARH MALA KHEL	GGPS KUTI KHEL
251.	FEHMIDA BIBI	GGPS MITO GHAZNI KHEL	GGPS ABDULLAH JAN BHITANNI

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 Govt.
- 3 Their services can be terminated at any time, in case 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 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 Entry in this effect should be made in their service book and other office record accordingly.
- 7 No TA/DA is allowed for joining his duty.

(PARVEEN KHATAK)
District Education Officer (Female)
Lakki Marwat

Endst: No. 1520-1774 Dated 01-03-2013

Copy forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Sub Divisional Education Officer (Female) Lakki Marwat
3. District Account Officer Lakki Marwat
4. Official Concerned.
5. M/File

[Signature]
District Education Officer (Female)
Lakki Marwat.

333-9044278 - 0345-9858593

ثانی کلر اینڈ مانیجر و فوٹو سٹیٹ سرورس

تاریخ: 01/03/2013

پاکستان کونگ ڈوگریٹیشن ٹیسٹ، ڈیڑھ سال کا امتحان اور

رگمن شائقین کا رڈ اور بورڈ اور پورٹ

کے تمام پرائیویٹ دانش اور سٹا۔ سابق

01/03/2013

[Handwritten signature]

124

GOVERNMENT OF KHYBER PAKHTUNKHWA

Elementary and Secondary Education Department

Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

NO.S.O (LIT-I)/E&SE/1-1/2012/Misc
Dated Peshawar the 04-12-2019

To

1. The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (F),
Lakki Marwat.

SUBJECT: -SERVICE APPEAL NO.865/2018 TITLED RASHIDA AKHTAR PSHT GCMS NAR KALA KHAN LAKKI MARWAT VS GOVT OF KPK

I am directed to refer to the subject noted above and to state that as per the existing litigation Policy of the Provincial Government of Khyber Pakhtunkhwa, the cases which can be resolved out of the Court by taking linient view, may be settled at the department level through a mutual consensus. The instant service appeal has been filed for not considering the legitimate right of the petitioner already exist in the shape of wedlock policy.

It is therefore, directed that the instant issue may be resolved at your own level in order to reduce the burden of litigation on the department which is increasing day by day and also to save the precious time and resources of the Provincial Government.

Endst.NO & date as above.

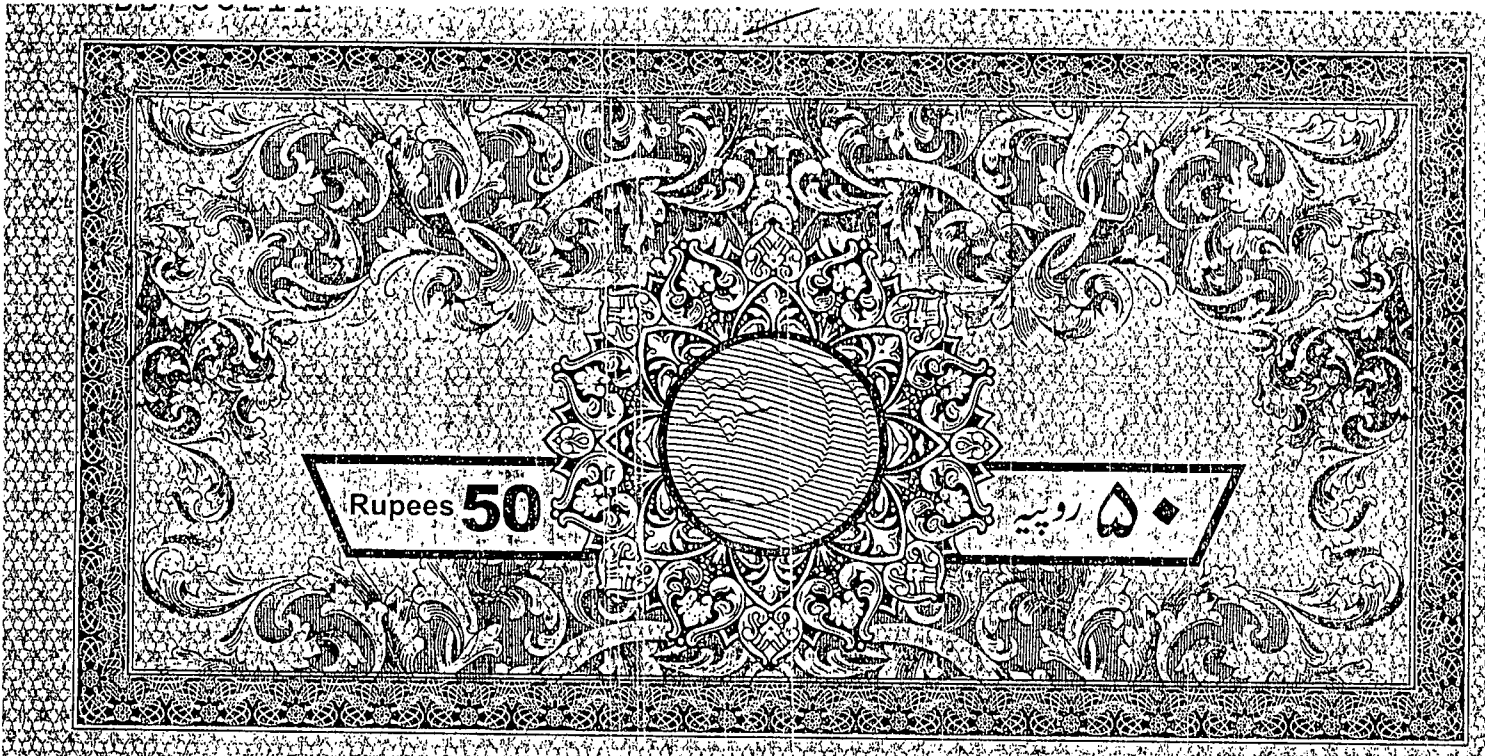
Copy to:-

1. Registrar Service Tribunal KP Peshawar.
2. P.A to DS (Legal) E&SED

Section officer (Lit-I)

Section officer (Lit-I)

Handwritten signature



مبارک صلی

قد کفر قبیلہ و دروغ زان کہ در کمال حقان حضرت حکارت صفا بیان در تاجون
که در مقام رشیدہ اختر آقا ۱۳۱۶ هجری میں۔ اور میں نے ایک عدد دروغ کتب رشیدہ اختر میں لکھا
مردان شریفوں میں دائر کتاب جو کہ زیر کلامت ہے۔ لکھا میں بیت اور حاکم رشیدہ اختر
کہ کفر کتب کا بیان حل ہوا تو حاکم رشیدہ اختر ایسا کہ لکھا میں بلکہ دروغ لکھا۔
میں میری فقیرت میں ہے۔ دروغ کا بیان حل سندت میں ہے۔

۹/۱۲/۱۶

1180/1-0391826-1

ظفر نقی

(Signature)

Mardar Ali Advocate
(Notary Public)
Distt: Bar, Lakki Marwat

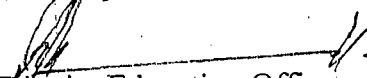
(Signature)

(Signature)

16

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT
OFFICE ORDER:-


Consequent upon the letter issued by Govt: of Khyber Pakhtunkhwa E&SE Department vide No: S.O(Lit-I)/E&SE/1-1/2012/Misc dated: 04-12-2019, the office orders issued vide this Office under Endst: No. 1737-40 dated: 14-03-2018 at S.No. 3 in r/o Mst: Rashida Akhtar and No.3804-08 dated: 11-09-2018 are hereby withdrawn in the interest of public service.


District Education Officer
(Female) Lakki Marwat

Endst: No. 6497-6502 Dated. 09/12/2018

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Registrar Honourable Service Tribunal Khyber Pakhtunkhwa Peshawar.
3. SDEO (F) concerned.
4. District Monitoring Officer Lakki Marwat.
5. Head Teacher concerned school.
6. M/File.


District Education Officer
(Female) Lakki Marwat

Atte Aes


B 17

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) LAKKI MARWAT**

Ph & Fax: (0969)538000, Email: deoflakki@gmail.com.

OFFICE ORDER:-

In compliance of instructions received through Govt: of Khyber Pakhtunkhwa E&SE Department vide Notification No.SO(SM)E&SED/7-1/2020/P/T/E-Transfer dated: 24-08-2021 the following teachers working on wrong posts are hereby transferred/adjusted (under e transfer policy) against the actual posts mentioned against their names in the interest of public service with immediate effect.

S.No	Name with Designation	From	Transferred to	Remarks
1	Akhtar Bibi, SST (B/C) B-16	GGCMHS No. 2 Lakki	GGHS Zangi Khel	Adjusted against actual post
2	Shumaila Farooqi, SPET B-16	GGHS Gandhi Khan Khel	GGHSS Ghazni Khel	-----do-----
3	Zainab Bibi, SDM B-16	GGHS Nasar Khel	GGHS Bachkan Ahmadzai	-----do-----
4	Tamkin Nazir, SDM B-16	GGHS Kotka Kotka Hayat Ullah (Gider)	GGHS Teri Khan Landiwah	-----do-----
5	Zulekha Begum, SCT B-16	GGHS Begu Khel	GGHS Nar Sardar Mairand Khel	-----do-----
6	Shumaila Asmat, DM B-15	GGHS Begu Khel	GGHS Qimat Manjiwala	-----do-----
7	Zahida Bibi, SDM B-16	GGHS Qimat Manjiwala	GGHS Begu Khel	-----do-----
8	Rafia Jabeen, PSHT B-15	GGPS Lakki Michan Khel	GGPS Abbasa Khatak No.1	-----do-----
9	Gul Nisa, PSHT B-15	GGPS Bega Tajazai	GGPS Ahmad Zai Ayaz Khan Kalla	-----do-----
10	Mumtaz Begum, PSHT B-15	GGPS Kundal Chowni	GGPS Akhto Jan Batanni	-----do-----
11	Akhtiyar Bibi, PSHT B-15	GGCMS Land Ahmad Khel	GGPS Amir Wali	-----do-----
12	Rashida Akhtar, PSHT B-15	GGCMS Nar Kala Khan	GGPS Azalmir Battani	-----do-----
13	Shamshad Begum, PSHT B-15	GGPS Wanda Kulan	GGPS Bakhmal Ahmad Zai	-----do-----
14	Abda Moin, SST (B/C) B-16	GGHS No.3 Lakki	GGHS Shahbaz Khel	-----do-----
15	Safina Bibi, AT B-15	GGHSS Titter Khel	GGMS Mela Mandra Khel	-----do-----
16	Shamim Akhtar, PSHT B-15	GGPS Muhammad Hassan Shahbaz Khel	GGPS Dau Khel Landiwah	-----do-----
17	Qaiser Tabassum, SCT B-16	GGHS Zangi Khel	GGHS Shahbaz Khel	-----do-----
18	Shahzadi Ambreen, S/Qaria B-15	GGHS Tajori	GGHS Dara Pezu	-----do-----

- NOTE: -
1. No TA/DA is allowed.
 2. Charge report should be submitted to all concerned.

Endst: No. 5509-16

Dated. 26/10/2021

District Education Officer
(Female) Lakki Marwat

Copy to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (EMA) Lakki Marwat.
3. Dy: District Education Officer (F) Lakki Marwat.
4. Principal/Head Mistress concerned schools.
5. District Accounts Officer Lakki Marwat.
6. SDEO (F) Lakki Marwat.
7. SDEO (F) Serai Naurang.
8. M/File.

District Education Officer
(Female) Lakki Marwat

[Signature]
District Education Officer
(Female) Lakki Marwat

بخدمت جناب DEO(F) لکی مروت

مضمون: محکمہ اپیل بر خلاف حکم مورخہ 26-10-2021 جاری کردہ DEO (F) لکی مروت جس کی وجہ سے من ساٹلہ کو GGCS نارکالا خان سے GGPS آڈل میر بیٹی بغیر کسی واضح قانونی جواز کے تبدیل کیا گیا۔

جناب عالیہ!

ساٹلہ عرض گزار ہے۔

1: یہ کہ ساٹلہ گاؤں نارکالا خان کی مستقل سکونت ہے اور مورخہ 01-03-2013 کو بحیثیت GGCS PSHT نارکالا خان میں متعین کی گئی۔

2: یہ کہ ساٹلہ اپنی فرانس منجھی نہایت خوش اسولی سے انجام دے رہی تھی کہ مورخہ 26-10-2021 کو GGPS آڈل میر بیٹی تبدیل کی گئی جو کہ ساٹلہ کے گھر سے 70 کلومیٹر دور ہے۔

3: یہ کہ پچھلے چند سالوں سے ساٹلہ کا تبادلہ بار بار کیا جا رہا ہے اور اب GGPS آڈل میر بیٹی تبادلہ کیا گیا۔

4: یہ کہ مذکورہ بالا تبدیلی قانون و پالیسی کے سراسر خلاف ہے اور بروئے فیصلہ جات عدالت عالیہ کسی بھی ملازم کو بار بار تبدیل نہیں کیا جاسکتا۔

5: یہ کہ بار بار تبادلوں سے استعداد کار اور کارکردگی متاثر ہوتی ہے۔

6: یہ کہ ساٹلہ کا تبادلہ جس سکول میں کیا گیا ہے وہ ساٹلہ کے گھر کو تو چھوڑیں ساٹلہ کے یوسی سے تقریباً پانچ یوسی دور یعنی 70 کلومیٹر دور کیا گیا ہے۔ جہاں ڈیوٹی انجام دینا ساٹلہ کے لئے سیکورٹی اور ٹریفک کی وجہ سے انتہائی مشکل ہے۔

7: یہ کہ ساٹلہ کو GGCS نارکالا خان میں ڈیوٹی انجام دینے کی اجازت سکرٹری لینیگیشن نے بھی دی ہے۔

8: یہ کہ ساٹلہ کا تبادلہ ذاتی عناد کی بنیاد پر دور افتادہ سکول میں کیا جاتا ہے (GPS ابو سمند بیگو نیل میں PSHT کی پوسٹ خالی ہے)

استدعا ہے کہ حکم مورخہ 26-10-2021 (Ends No: 5509-16) جاری کردہ DEO (F) لکی مروت کال عدم قرار دیا جائے اور ساٹلہ کو اپنے گاؤں کے سکول میں کام کرنے کے احکامات صادر کیے جائیں۔

مشکور رہوں گی۔ (15.11.21) Regd No: 145

العارضہ

رشیدہ اختر

GGCS PSHT نارکالا خان

مورخہ:

Signature

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

CM. No. _____ /2022

Rashida Akhtar

versus

DEO & Others

**APPLICATION FOR SUSPENSION OF OFFICE ORDER
DATED 26-10-2021 TILL THE DECISION OF THE
CASE:**

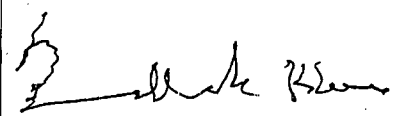
Respectfully Sheweth:

1. That applicant filed the subject Appeal before this hon'ble Tribunal today.
2. That no reason in order of transfer is given but the same was made in the interest of them and till date, charge of the post is not yet relinquished.
3. That prima facie case exists, balance of convenience lies in favor of applicant and is hopeful of the success of the appeal.
4. That facts and grounds of the appeal be treated as integral part of this application for grant of Interim relief.

It is, therefore, requested that order dated 26-10-2021 be suspended till the decision of the case.

Through

Applicant:


(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

Dated: 26-01-2022

20

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

C.M. No. _____ /2022

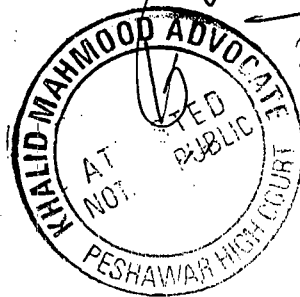
Rashida Akhtar

versus

DEO & Others

AFFIDAVIT

I, Rashida Akhtar, Applicant, do hereby solemnly affirm and declare that contents of **Application** are true and correct to the best of my knowledge and belief.



Rashida

DEPONENT

بعد الت جٹاپ سرسٹریٹ ٹریڈنگ کمپنی پشاور

متجانب اعلان

مقررہ تاریخ نام

دعویٰ آریل

باعث شکر یہ کہ

①

②

مقررہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ ان مقام پشاور کیسٹم سٹیشن آفیس خان سرور سے ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے بلکہ نامہ و اقرار ثالث و فیصلہ برتلاف دینے جواب دہی اور اقبالی دعویٰ اور ہمیشہ ڈگری کرنے اجراء اور دعویٰ چیک و روپیہ اور مرضی دعویٰ اور درخواست ہر قسم کی تقدیر اور اس پر دستخط کرنے کا اختیار ہوگا نیز بہتر عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور ترمیمی اپیل دائر کرنے اپیل نگران و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ منکر کے کل یا جزوی کاروائی سے واسطے اور وکیل یا مشاور قانونی کو اپنے ہمراہ یا اپنی بجائے تفرک اختیار ہوگا اور وہ اپنے مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سامنے پروا غنہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی بمقام درجہ پر ہو یا عدت باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا کالت نامہ رکھ دیا کہ سند ہے۔

المرقوم 22-07-26

التعبید

التعبید

التعبید

ارباب نیف اتمال
ایڈووکیٹ

ایڈووکیٹ
ایڈووکیٹ

محمد کوانز
ایڈووکیٹ

دراختہ