

12.04.2022

Learned counsel for the appellant present.

He made a request for adjournment in order to prepare the brief. Adjourned. To come up for preliminary hearing on 06.06.2022 before S.B.



(Rozina Rehman)
Member (J)

06.06.2022

Appellant present through representative.

Lawyers are on general strike, therefore, case is adjourned to 27.07.2022 for preliminary hearing before S.B.



(Rozina Rehman)
Member (J)

28.07.2022

Appellant present through counsel.

As per order sheet dated 30.07.2021, pre-admission notice had been issued to the respondents but till today, none from the respondents attended the Tribunal, therefore, notice be issued to the learned AAG for making sure the presence of respondents and comments on or before the next date. To come up for reply/preliminary hearing on 28.09.2022 before S.B.

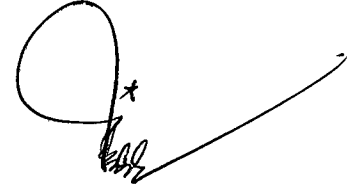


(Rozina Rehman)
Member (J)

05.10.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for preliminary arguments before the S.B on 01.12.2021.

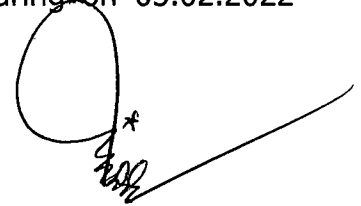


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

01.12.2021

None for the appellant present.

Fresh notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing on 03.02.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

03.02.2022

The Tribunal is non-functional, therefore, the case is adjourned to 12.04.2022 before S.B for the same.



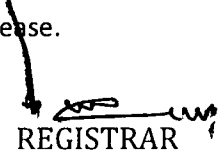


Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 5797 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/06/2021	<p>The appeal of Mst. Noor Shad Begum resubmitted today by Mr. Ashraf Ali Khattak 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</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be up there on <u>30/07/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>30.07.2021</p> <p>Counsel for the appellant present. Pre-admission notice be issued to respondents as well as learned AAG. To come up for preliminary hearing on 15.10.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mst. Noor Shad Begum PST GGPS Karak received today i.e. on 26.05.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-A & B of the appeal are illegible which may be replaced by legible/better one.
- 2- Copy of order dated 08.08.2016 mentioned in the index of the appeal at serial no. 7 is not attached with the appeal which may be placed on it.
- 3- Affidavit may be got attested by the Oath Commissioner.


No. 896 /S.T,

Dt. 27/05 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ashraf Ali Khattak Adv. Pesh.

Objection attended
Kindly place bef the
Honorable Tribunal


4/6/21
Ashraf Ali Khattak
Advocate

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

Service Appeal No. 57972021

Mst: Noor Shad Begum,
W/o Ahmad Nawaz;
PST, GGPS, Karak Sar;
Karak City.....Petitioner

Versus

The Director Education,
(E & SE) Govt: of KPK;
Peshawar and others and othersRespondents

INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Writ Petition with Affidavit			1-7
2.				
3.	Copy of appointment order	19.05.2004	A	8
4.	Copy of regularization order w.e.f. 19.05.2004	01.11.2005	B	9-10
5.	Copy of up-gradation order from BPS-7 to BPS-9	19.11.2015	C	11
6.	Copy of up-gradation order from BPS-9 to BPS-12	11.11.2016	D	12-13
7.	Copy of promotion order to BPS-15	08.08.2016	E	14-23
8.	Copy of abstract from service alongwith pay slip		F	24-25
9.	Copy of W.P No. 763-B/2019	26.02.2020	G	26-31
10.	Copy of department representation		H	32-33
11.	Copy of transfer order insurance of the order of the Hon'ble court	30.06.2020	I	34
12.	Copy of the departmental appeal		J	35-36
13.	Copy of impugned order of rejection	05.04.2021	K	37
14.	Wakalat Nama.			38


Petitioner

Through


Ashraf Ali Khattak
Advocate,
High Court, Peshawar

(1)

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

Service Appeal No. _____/2021

**Mst: Noor Shad Begum,
W/o Ahmad Nawaz;
PST, GGPS, Karak Sar;
Karak CityAppellant.**

Versus

1. The Director Education (E & SE),
Govt: of Khyber Pakhtunkhwa;
Peshawar.
2. The Deputy Director (Estt:);
Merged Areas, Education Directorate;
Peshawar
3. The District Education Officer (F);
District Karak.
4. The District Education Officer (F);
District North Waziristan;
MeranshahRespondents.

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE IMPUGNED ORDER OF RESPONDENT NO.2 DATED 05-
04/2021 COMMUNICATED ON 28-04-2021; WHEREBY HE
REJECTED DEPARTMENTAL APPEAL OF THE
APPELLANT DATED 15-03-2021 FILED FOR RE-FIXATION
OF PAY IN BPS-15.**

PRAYER:-

On acceptance of the instance service appeal; this Honourable Tribunal may graciously be pleased to:-

- i. Declare both impugned order dated 05-04-2021 of the respondent No.2; wherein he rejected departmental appeal of the appellant filed for fixation of appellant's pay in BPS-15 as illegal, unlawful and without lawful authority and set aside the same.**
- ii. Direct the respondents to correct the wrong entry in transfer order dated 30-06-2020 to the extent of mentioning the post of appellant in BPS-12 instead of BPS-15.**
- iii. Direct the respondent to re-fix the pay of the appellant in BPS-15 w.e. from the date of her transfer and posting/assumption of charge at GGPS Karak Sar (Karak City) i.e 30-06-2020 and release the outstanding pay since then with all back benefits;**
- iv. Any other relief not asked for but deemed appropriate under the circumstances the case may also be graciously granted.**

Respectfully Sheweth,

The concise facts giving rise to the present writ petition are as under:-

1. That appellant was enrolled as PTC (BPS-07) vide order dated 19-05-2004 (**Annexure-A**) through prescribed procedure and posted at GGPS Jahangir Kot Spulga; District North Waziristan. She has got 17 years service at her credit with unblemished and clean sheeted conduct record.
2. That the services of the appellant was regularized vide order dated 01-11-2005 (**Annexure-B**) with effect from the date of her 1st

appointment i.e 19-05-2004 in the light and pursuance of the Judgment/Order of the Hon'ble Peshawar High Court and Supreme Court of Pakistan.

3. That later on vide order Endst: No.934-38 dated 19-11-2015, the post of appellant was up-graded from BPS-07 to BPS-09 with effect from 01-10-2007 (**Annexure-C**).
4. That appellant was further up-graded from PBS-09 to BPS-12 with effect from 01-07-2012 in pursuance of the Notification No.FS/SO/Edu/SSD No.2882-94 Dated, Peshawar 22-06-2016 and DE FATA No.8233-60 dated 08-08-2016 vide AEO NWA No.1138-43 dated 11-11-2016 as evident from the extract of Service Book (**Annexure-D**).
2. That in pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No. (B & A)/1-18/E & SE: 2021 dated 11-07-2012 and issued by Finance Department (Regulation Wing), Islamabad vide Endst: No.1(32)R-1/2015-592-2016 dated 28-07-2016 and Directorate of Education (FATA) Endst: No.8233-60 dated 08-08-2016; appellant was promoted to the post of PSHT (BPS-15) by the competent authority. Appellant lies at serial No.43 of the Notification (**Annexure-E**). The order was further endorsed by respondent No.4 vide Endst No.13107-13 dated 27-12-2018 as evident from the extract of Service Book. The pay of the appellant was also fixed in BPS-15 accordingly. (**Annexure-F**).
3. That it is pertinent to mention here that appellant was entitle to be promoted to BPS-14 and then to BPS-15 with effect from 01-07-2012 but she was promoted to BPS-15 with immediate effect i.e with effect from 27-12-2018 and whereas her other colleagues were

promoted with effect from the date of original Notification dated 01-07-2012. Appellant has also file departmental appeal in this respect and will knock the door of justice if the grievance of the appellant is not redressed departmentally.

4. That since appellant was bonafide resident of District Karak and her husband was also a school teacher at Karak therefore she filed application for her transfer to District Karak on Wed Lock policy, but the application was not entertained and appellant was constrained to invoked the Constitutional Jurisdiction of the Hon'ble Peshawar High Court. Appellant filed Constitutional Petition No.763-B/2019 for her transfer to District Karak under the Provincial Govt: Wed Lock Policy and the same was allowed by the Hon'ble Court vide Order dated 26-02-2020 (**Annexure-G**).
5. That in the light of the judgment of this Hon'ble Court; appellant filed departmental representations (**Annexure-H**).
6. That at last in pursuance and in the light of the directions of the Hon'ble Peshawar High Court dated 26-02-2020 appellant was transferred to Karak City on ground of Wed Lock Policy and post at GGPS, Karak Sar vide order dated 30-06-2020 (**Annexure-I**).
7. That at the time of appellant's transfer to District Karak; she was serving in BPS-15 but due to clerical mistake it is wrongly mentioned in the transfer order dated 30-06-2020 that appellant was serving in BPS-12.
8. That the pay of the appellant was fixed in BPS-12. Appellant filed departmental appeal (**Annexure-J**) against the wrong entry in the transfer order dated 30-06-2020 and fixation of her pay in BPS-12, but the same has now been rejected vide order 05-04-

2021(Annexure-K). The impugned order has not been communicated to the appellant and appellant has received the same through her own efforts on 28-04-2021.

9. That appellant now being aggrieved of the impugned order dated 05-04-2021 and to the extent of wrong entry of BPS-12 in the transfer order dated 30-06-2020 and further fixation of her pay in BPS-12 invoke the Jurisdiction of this Hon'ble Tribunal inter alias on the following grounds.
 - A. That appellant has not been treated by the respondents in accordance with law, rules and policy on the subject and acted in violation of Article 4, 10A of Constitution of Pakistan, 1973. Appellant has been promoted to the post of PSHT in the year 2018 on regular basis and her pay was also fixed in BPS-15 i.e two year before her transfer to Karak which was made on the basis of the direction of the Hon,ble Peshawar High Court, Bannu Bench dated 26-02-2020. The entry of BPS-12 in the transfer order dated 30-06-2020 instead of BPS-15 is wrong and ineffective upon the right of the appellant therefore, this Hon'ble Court has got the jurisdiction to enter into and direct the respondents to do the needful as per law and rule.
 - B. That it has clearly been mentioned in the Provincial Govt: posting and transfer policy that a civil servant can be transferred on the basis of Wed Lock Policy with pay protection. Transfer is not a punishment. A civil servant cannot be demoted to lower grade on the basis of transfer therefore, entry in the transfer order dated 30-06-2020 is wrong and is liable to be interfere with.
 - C. That appellant has been downgraded without any fault on her part and without any show cause, without any sort of misconduct which is

6.

nullity in the eyes of law, rules and the same is against the principle of natural justice.

- D. That appellant would like to seek the permission of this Honorable Tribunal to submit other grounds at the time of hearing.

It is therefore, humbly prayed that on acceptance of this service appeal, this Hon'ble Tribunal may be pleased to:-

- v. **Declare both impugned order dated 05-04-2021 of the respondent No.2; wherein he rejected departmental appeal of the appellant filed for fixation of appellant's pay in BPS-15 as illegal, unlawful and without lawful authority and set aside the same.**
- vi. **Direct the respondents to correct the wrong entry in transfer order dated 30-06-2020 to the extent of mentioning the post of appellant in BPS-12 instead of BPS-15.**
- vii. **Direct the respondent to re-fix the pay of the appellant in BPS-15 w.e. from the date of her transfer and posting/assumption of charge at GGPS Karak Sar (Karak City) i.e 30-06-2020 and release the outstanding pay since then with all back benefits;**
- viii. **Any other relief not asked for but deemed appropriate under the circumstances the case may also be graciously granted.**

ذریعہ
Appellant

Through

اشرف علی خٹک
Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

Dated: ___/___/2021

7

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. ____/2021

Mst: Noor Shad Begum,
W/o Ahmad Nawaz;
PST, GGPS, Karak Sar;
Karak City.....Petitioner

Versus

The Director Education,
(E & SE) Govt: of KPK;
Peshawar and others and othersRespondents

AFFIDAVIT

I, Mst: Noor Shad Begum, W/o Ahmad Nawaz; PST, GGPS, Karak Sar; Karak City, do hereby solemnly affirm and declare on oath that the contents of this service appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

Deponent

Anx-A (8)

Amex-A

OFFICE OF THE AGENCY EDUCATION OFFICER, NORTH WAZIRISTAN AGENCY.
APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee the following Non Local Female P.T.C candidates are hereby appointed against P.T.C Posts in BPS - 7 (Rs. 2220-120-5820) PM, plus usual allowances as admissible under the rules, purely on contract basis for three years with effect from their taking over charge against vacant posts noted against each.

S.No.	Name of Candidate/Father Name	Name of School where Posted	Remarks
11	1. Zubida Ghani D/O Amal Ghani	GGPS Ayub Kot Dossali	Against Vacant Post
12	2. Shamim Akhtar D/O Khial Badshah	Do	Do
13	3. Farh-un-Nisa D/O Nek Nawaz	GGPS Kajir Kot Razmak	Do
14	4. Tallat Kausar D/O Aslam Zada	Do	Do
15	5. Mamoon Akhtar D/O Mohammad Zubair	FCS Mashal Kot	Do
16	6. Gul Taj Bibi D/O Bahram Shehzada	FCS Pasham Kot Razoni	Do
17	7. Kalsum Akhtar D/O Zar Bad Shah	GGPS Faqir Mittar	Do
18	8. Felak Naz D/O Gul Bostan	Do	Do
19	9. Noor Sina Begum D/O Rehmat Gul	GGPS Jehandeer Kot Spulga	Do
20	10. Saeeda Akhtar D/O Said Nawaz	GGPS Shakir Jan Kot Shewa	Do
21	11. Nahid Feroz D/O Noor Jamal	GGPS Gul Zaray Tall Village	Do
22	12. Farhat Yasmin D/O Mohammad Younas	GGPS Pir Rehman Kot Khushali	Do
23	13. Razia Naz D/O Mohammad Israr	GGPS Abas Khan Kot Spinwam	Do
24	14. Zartaj Begum D/O Sher Afzal	GGPS Allam Gul Kot Padami Killa	Do
25	15. Saima Sadiq D/O Ghulam Sadiq	FCS Awad Kot Spinwam	Do
26	16. Rifat D/O Allam Khan	Do	Do
27	17. Farida Khanum D/O Noor Mohammadi	FCS Lala Zaman Kot Khatti Killa	Do

TERMS AND CONDITION.

1. Their appointment are being made purely on CONTRACT basis and liable to termination at any time without any notice, if wish to resign from their posts, they should give one month prior notice or forfeit one month of pay in lieu thereof.
2. They should not be handed over charge of the same post if they are below 18 years or above 33 years age.
3. They should produce their health and age certificate from the Medical Superintendent Agency Head Quarter Hospital Miranshah.
4. Their original qualifications, date of birth and domicile certificate should be checked and photo copy be placed on the record, before handed over charge of the same posts.
5. If they fail to resume their charge within 15 days, the order should be treated as cancelled.
6. Their academic / Professional certificates will be referred to all concerned Boards / Universities (by depositing usual fee charges) for necessary verification till the receipt their certificates, the salary will not be drawn.
7. TA / DA is not allowed.
8. They should produce their NIC to the AEO circle concerned.
9. Charge report should be submitted in duplicate to all concerned.
10. They will be terminated if they found absent two days continuously from the date of taking over charge.

Agency Education Officer,
North Waziristan Agency.

Ends No. 2558-83 / A.E.O / N.W.A / Appt: PTC / Shawal

Dated 19/5/06

COPY TO :-

1. The Director of Education (FATA) Governor's Secretariat Peshawar.
2. The Political Agent North Waziristan Agency Miranshah.
3. The assistant Political Officer North Waziristan Agency Miranshah.
4. The Agency Accounts officer North Waziristan Agency Miranshah.
5. A.A.E.O circle concerned.
6. Accountant Local Office.
7. Head Teachers concerned.
8. Candidates concerned.

Agency Education Officer,
North Waziristan Agency.

Attested by

Mustafa
Shah

Agency Education Officer,
North Waziristan Agency.

Anx-B (9)

DIRECTORATE OF EDUCATION
FATA, N.W.F.P., PESHAWAR
NO. 18795-805
Dated Pesh: the 1/11/2005

Subject:

IMPLEMENTATION OF HONOURABLE PESHAWAR HIGH COURT/
SUPREME COURT OF PAKISTAN DECISION AND GOVT: OF NWFP
E & AD DEPARTMENT NOTIFICATION REGARDING CONTRACT
POLICY

Memo:

As per decision of Honourable High Court Peshawar/
Supreme court of Pakistan in various write petition against contract
policy as well as the Govt: of NWFP, E & AD. Department Notification
DEVT/VI/1-13/2005, dated 10-8-2005, the candidate who were
appointed the result of advertisement published before the introduc-
tion of contract policy i.e 1/7/2001, are hereby regularized with
effect from the date of their appointments.

Entries to this effect should be made in their service
books under intimation to this Directorate without loss of time.

This may be treated as most urgent being a court
matter.

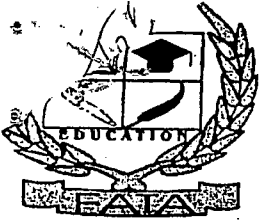
DY: DIRECTOR OF EDUCATION
FATA, NWFP, PESHAWAR

Encls. No. 18806-907

Copy for information and necessary action to the -
Registrar Peshawar High Court for information with the request
that the case regarding contract appointment may not be
admitted in light of recent policy and in case of previous
appeal /petition the same may be dismissed.
Advocate General NWFP for similar action please.
Registrar Services Tribunal, NWFP, for similar action please.
All the Principals/Headmasters concerned in FATA
All AEOs in FATA
Accountant General NWFP please.

Attested by
*

9		10	11	12	13		14	15
Signature and name of the Head of the office or other attesting officer of Column 1 to 8		Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
دستخط سرکاری ملازم		تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کا ریکارڈ
						Period Government to which debitable		
						عرصہ		
						Service verified w/e 30-11-2020 to 30-11-2020 from Accep. Roll and other office record.		
						<p style="text-align: center;">SDE(F) Kasak</p> <p style="text-align: center;">In the light of Honourable High Court Peshawar Judgement of dated 1st Nov 2005, and notification of Govt. of NWFP E+D Department Notification No. 50 E+D/VI/1-13/2005 dated 10-8-2005, those who were appointed before 1st July 2001 i.e. introduction of contract policy, are regularized w/e date of their appointment. Hence, the employee regularized w/e 20-5-2004.</p>		
				Attested by		<p style="text-align: right;">Director (Personnel) Tribal Distt. North West Frontier Province Muz</p>		



Anx-C

11

OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY MIRANSHAH

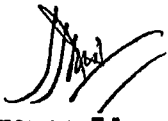
NO: _____ / PTC / AEO / NWA

DATED: ____ / ____ / 2015.

ADMINISTRATIVE SANCTION:

In pursuance of Govt: of NWFP, Finance Department notification NO., FD(SR.1) 6-4/2005 dated Peshawar the MAY 23, 2006 the following qualified teachers of Education Department are Placed in BPS mentioned against each on accounting of possessing Higher qualification.

S.No	Name with school	Design	Qualifi:	Present BPS	Awarded BPS	Date of Up-Gradation
1.	Noor Shad Begum GGPS Jehangir kot Spulga	PTC	FA	07	09	1.10.2007
2.	Bibi Sabira GGPS Rauf Khan kot Mirali	PTC	PTC	05	06	24.6.2013



Agency Education Officer
North Waziristan Miranshah


Endst: No 934-38 / PTC / AEO / NWA

Dated 29/11 / 2015.

COPY TO:

1. Director of Education FATA KPK Peshawar.
2. The Agency Accounts Officer NWA Miranshah
3. AAEOs Concerned
4. Accountant Local Office.
5. Candidate Concerned.


Agency Education Officer
North Waziristan Miranshah

Attested by


Prs. No, 50212911

N.I.C. No, 14202-1284697-4

- 1- Name (نام) Noor Shad Begum
- 2- Nationality and Religion Islam / Pakistani
- 3- Residence Near old Civil Hospital Karak.
- 4- Father's name and residence Rehmat Gul
- 5- Date of birth by christian era as 15-02-1974 (Fifteen Feb
nearly as can be ascertained Nineteen Seventy four)
- 6- Exact height by measurement 4'-9"
- 7- Personal mark of identificator NIL

Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

(کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger

(چھنگلیا)

Ring Finger

(چھنگلیا کے ساتھ کی انگلی)

Middle Finger

(انگشت میاں)

Fore Finger

(انگشت شہادت)

Thumb

(انگوٹھا)

Noor Shad Begum

9. Signature of Govt. Servent

(سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office or other Attesting officer

(تصدیق کنندہ افسر کے دستخط اور مہر)

Agency Education Office,
Q. W. Agency Miranahat

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔

Attested by

انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

1	2	3	4		5		6	7	8
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II اگر عارضی ہے تو رول کے مطابق پیش کش کا مستحق ہے؟	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature Government
			Rs.	Ps.	Rs.	Ps.	مساوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط برکاری ملازم
درجہ ملازمت P.T.C Post ۴-۴-۱۰۵	عارضی مستقل یا یا قائم مقام		2220	120	5820				
Jahan Goox kot			Rs. 2220	120	Fixed.			2005	
			Rs. 2555	140	6755				
			Rs. 2255	120	Fixed.			2005	
			Rs. 2910	160	7740				
			Rs. 2910	160	7740			2007	
			Rs. 3530	180	9230				
			Rs. 3530	180	9230			2008	
			Rs. 3720	180	9230			2008	
			Rs. 3910	180	9230			2009	
			Rs. 4100	180	9230			2010	

<p>Signature and Designation of the Head of the office or other Attesting officer Column 1 to 8</p> <p>دستخط سرکار ملازم</p>	<p>Date of termination or appointment</p> <p>تاریخ انقطاع ملازمت</p>	<p>Reason of termination (such as promotion, transfer, dismissal)</p> <p>وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی</p>	<p>Signature of the head of the office or other Attesting officer</p> <p>دستخط افسر مجاز</p>	<p>Nature and duration of leave taken</p> <p>طبیعت و مدت عہد</p>	<p>Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government</p> <p>Period Government to which debitable</p> <p>مہینے حکومت جسے رقم ادا ہوگی</p>	<p>Signature of the Head of the office or other attesting officer</p> <p>Reference to any recorded punishment or censure, reward or praised of the Government servants</p> <p>کار کردگی کا</p>
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Passed CT Examination from Alama Iqbal

Note:- Pay verified subject to the following conditions:-
 i) Each and every entry may be got attested from DDO (ii) regularization order. (iii) option of the concerned duly signed by DDO on 1/12/17 for regularization of pay.

University Islamabad Session Autumn 2000
 Under R.No: 1-6541802
 Result declared 25th Jan, 2002, marks obtained 58% in grade - B.

Office of the AGPR Pathwar pay fixed in the Revised Basic Pay scale of Rs BPS-09
 At Rs 1780/- PM w.e.f 1-7-16
 With next increment on 1-12-16

Asstt. A/c Officer
 Pay Fixation Party

Sanctioned according to the up gradation BPS-9 vide Govt. of NWFP Finance Department notification No. PDCSR-176-6/2005 Dated Peshawar the 23-5-2005 and per their order under by the Agency Edu: Office North Waziristan Miranshah order No 939-38/PIC/AD0/MWA Dated 19-11-2015.

Drawn Amount of Pay & Allow; on up gradation from BPS: 07 To BPS: 9 w.e.f 2/12/07 To 30/6/2017 amounting to Rs 187670/-

Agency Accounts Officer
 N.W.F. Miran Shah

Agency Officer

North Waziristan Agency

A. Edu. Office North

1	2	3	4		5		6	7	8
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature Government servant
			Rs.	Ps.	Rs.	Ps.			
درجہ ملازمت PST Post	عارضی مستقل یا یا قائم مقام	اگر عارضی ہے تو رول کے مطابق پیش کش کا مستحق ہے؟	تنخواہ بطور عارضی ملازمت		زائد تنخواہ بطور قائم مقام		ماسوائے تنخواہ دیگر الادائس	تاریخ تقرری	دستخط سرکاری ملازم
<p> <i>Sal Shulga</i> Revised entry on A/c of <i>graduation from B-9 to B-12</i> w.e.f. 1-7-2012, vide SSD No-FS/50/edu/SSD No 2882-9, D.P. No. 22-6-16 & DE FATA No 8233-6a dt: 8/8/2016 & vide AEO NWIA No 1138-43 dt: 11/11/2016. </p> <p> (ii) - Graduation BPS = 12 </p> <p> R/BPS: 12 </p> <p> R/BPS: 12 </p> <p> R/BPS: 12 </p> <p> A.C.P.R Sub-Office Peshawar Pay fixed in the Revised Basic Pay Scale of Rs. <u>23880/-</u> BPS 12 at Rs. <u>23880/-</u> P.M w.e.f. <u>1/7/2017</u> with next increment of <u>1/7/2017</u> </p> <p> Assistant Accounts Officer Pay Fixation Party </p> <p> 25800/- 01-12-2018 </p> <p> Revised Entries in BPS-15 (16120-1330-56020) </p> <p> One Advance inc for Rs- 2676/- + 1330 </p> <p> Premature Rs- 2809/- 28-12-2018 </p> <p> District Education Officer North Waziristan Tribal District 6/2/2019 </p>									

Signature
Designation
Office or
Posting or
Attestation
column 1

دستخط
افسر مجاز

D
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Anx-E (14)

(F) PSHT-15

"C"



OFFICE OF THE DISTRICT OFFICER, NORTH WEST FRONTIER PROVINCE

EDUCATION NORTH WEST FRONTIER PROVINCE



NOTIFICATION: (FEMALE PSHT)

In pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No.(B&A)/1-18/E&SE 2012, dated: 11.7.2012 and issued by Finance Deptt: (Regulation wing) Islamabad vide Endst: No: 1(32)R-1/2015-592-2016 dated: 28/07/2016 and Directorate of Edu: (FATA) Endst: No: 8233-60, dated: 8/08/2016. Consequent upon recommendation of Departmental Promotion Committee, the following .PST B-12/ SPST B-14 (Female) in N.W. F. P. are hereby Promoted to the post of PSHT (B-15) Rs.(16120—1330--56020) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Govt. in teaching cadre. They are placed at the disposal of DEO N.W.T.DS for further adjustment on the terms & conditions mentioned below with immediate effect.

S#	Sen #	Name of Teacher	Date of Birth	Place of Posting	Remarks
1	63	Nazanin Begum	07.03.1970	GGPS Zar Khan Kot	Promoted to the post of PSHT on regular basis B15 with immediate effect.
2	87	Farzana	01.10.1970	GGPS Lal Jan Kot	Do
3	88	Baskhudara	03.06.1979	GGPS Mubarik Khan	Do
4	89	Farzana	12.04.1982	GGPS Toor Ajam Kot	Do
5	92	Balqis Akhtar	09.08.1979	GGPS Sherdad Kot	Do
6	93	Chand Gul	01.02.1975	GGPS Akbar Khan Kot Shewa	Do
8	98	Musrat Nishad	06.01.1978	GGPS Aurangzeb Kot	Do
9	104	Nasrin	19.12.1980	GGPS Noor Fazal Kot	Do
10	113	Farzana Nawab	01.02.1981	GGPS Inayat Khan Kot	Do
11	114	Fehmeeda	01.04.1974	GGPS Mir Akbar Kot Mir Ali	Do
12	115	Tehmina Rauf	05.10.1966	GGHS Civil Colony Miranshah	Do

Attested by
Bani Ahmad

Attested by
[Signature]

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				Miranshah.	
13	117	Shabana Naz	12.05.1979	GGPS Aurangzeb Kot	Do
14	118	Rashida Noorin	03.09.1979	GGPS Ahmad Jan Kot	Do
15	120	Nadia Akbar	16.05.1983	GGPS Rihan Kot	Do
16	121	Tamana Gul	01.05.1981	GGPS Mohammad Wali Kot	Do
17	122	Rasul Niaza	20.02.1984	GGPS Hafizabad Hassu Khel	Do
18	124	Zainab Ferdoos	10.09.1980	GGPS Yunas Kot	Do
19	128	Roosina Bibi	01.02.1976	GGPS Sardar Habibullah Kot	Do
20	131	Zinat Iqbal	06.09.1979	GGPS Jahangir Kot	Do
21	134	Rubina Shaheen	01.03.1979	GGPS Gul Maroof Kot	Do
22	135	Umer Yasim	25.01.1980	GGPS Arbab Kot	Do
23	136	Shima	14.02.1980	GGPS Asal Mar Jan Kot	Do
24	137	Zaib Un Nisa	09.01.1976	GGPS Shah Alam Kot	Do
25	138	Kalsum Bibi	14.03.1980	GGPS Said Manoor Kot	Do
26	140	Niaz Jamila	01.01.1981	GGMS Rafi Gul Kot Mirali	Do
27	141	Zainub Bibi	13.02.1981	GGPS Pir Rehman	Do
28	142	Asma Ayaz	13.02.1982	GGPS Hukman Kot	Do
29	148	Falak Naz	01.04.1983	GGPS Saleh Gul Kot	Do
30	150	Perween Jehan	07.07.1977	GGPS Shakim Jan Kot	Do
31	154	Perween Sultana	17.12.1977	GGPS Gul wali Kot	Do
32	155	Bibi Saira	02.04.1980	GGPS Lazim Khan	Do
33	156	Rukhsana Begum	15.08.1977	GGPS Idal khel	Do
34	157	Shahida Begum	01.09.1976	GGPS Akram Kot Tochi Par Tappi	Do
35	158	Qaisar bibi	22.04.1979	GGPS Sher Ayub Kot	Do

Approved
Baris
HWS

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36	159	Makiela Begum	03.10.1979	GGPS Inzar Kass Kazha Mada Khel Datta Khel	Do
37	160	Gul Naz Begum	15.08.1981	GGPS Muhammad Noor Kot	Do
38	164	Bibi Sufiah	03.01.1978	GGPS Najeem Khun Kot	Do
39	166	Sherina Naz	15.08.1978	GGPS Sakhi Mar Jan Kot	Do
40	167	Sariqat	30.04.1975	GGMS Arsala Jan Kot	Do
41	168	Rukhsar Begum	09.08.1979	GGPS Mohd Sadiq Mandi Khel	Do
42	169	Sameen Gul	12.09.1976	GGPS Anar Gul Kot	Do
43	170	Noor Shad Begum	15.02.1974	GGPS Jahangir Kot	Do
44	171	Saeeda Akhtar	03.02.1978	GGPS Shakim Jan Kot	Do
45	174	Zubida Ghani	01.01.1977	GGPS Bakht Ali Kot	Do
46	175	Fatima Bibi	03.01.1974	GGPS Farid ullah	Do
47	176	Neghat Seema	30.03.1977	GGMS Badshah Mir Khan Kot	Do
48	177	Nayla Yasmin	01.01.1980	GGMS Mir Akbar Kot	Do
49	178	Bushra Rashid	02.08.1980	GGPS Liaz Kot	Do
50	182	Mehnaz Begum	01.12.1982	GGPS Rangin Kot	Do
51	188	Hussan Zada	08.03.1978	GGPS Jalil Kot	Do
52	189	Balqis Bibi	15.09.1979	GGPS Gul Rushan Kot	Do
53	190	Musarat Nazir	03.01.1982	GGMS Doctor Noor Janat Gul Kot	Do
54	191	Zafran Akhtar	15.08.1979	GGPS Abdullah Shah Kot Isha Piran	Do
55	193	Basmina	01.01.1984	GGPS Nek Daraz Kot	Do
56	194	Tahira Shaheen	20.03.1979	GGPS Asif Nawaz	Do
57	195	Anwar Sultana	20.02.1983	GGPS Zahoor Din Kot	Do

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58	196	Ume KalSum	01.01.1985	GGPS Mohammad Noor Kot Khaddi	Do
59	197	Pari Naz	25.09.1980	GGPS Akram Kot	Do
60	198	Razia Sultana	06.09.1984	GGPS Darya	Do
61	199	Naheed Tabassum	28.06.1977	GGPS Mohammad Karim Kot	Do
62	200	Rahlla Ferdous	14.11.1980	GGPS Arbab Kot	Do
63	203	Khatim Un nisa	01.01.1983	GGPS Nek Daraz Kot	Do
64	207	Bibi Zaina	02.03.1975	GGPS Fazal Karim	Do
65	208	Najma Shaheen	01.02.1981	GGPS Zamindar Kot	Do
66	209	Saira	14.03.1979	GGPS Noor Mohammad Kot Spinwam	Do
67	216	Gul Nasrin	01.01.1984	GGPS Tehsil Khan Kazha Mada Khel Datta Khel	Do
68	222	Taslim Akhtar	01.04.1979	GGPS Sher Ayub Kot	Do
69	225	Zubida	15.08.1979	GGPS Saifullah Kot	Do
70	226	Ruqia Ahmad	10.11.1979	GGPS Qutab Khan	Do
71	230	Naveeda Hayat	01.01.1980	GGPS Mawaz Kot	Do
72	232	Sartaj Begum	06.06.1981	GGPS Abidullah Shah Kot Mandi Khel Dossali	Do
73	233	Busnihada	01.01.1982	GGPS Badshah Mir Khan Kot	Do
74	235	Islam Khatoon	01.07.1982	GGPS Anwar Abad	Do
75	236	Zahida Khatoon	13.02.1983	GGPS Anwar Abad	Do
76	237	Shamim Ara	19.02.1984	GGPS Mohammad Azam	Do
77	238	Sabiha Anjam	01.04.1979	GGPS Zarghun Shah Kot	Do
78	242	Taslim Bibi	14.08.1980	GGPS Akram Kot	Do
79	243	Arjuman Shakila	20.12.1982	GGPS Gul Jan Kot	Do
80	245	Bakhat Zameena	26.02.1991	GGPS Zahir Shah Kot	Do

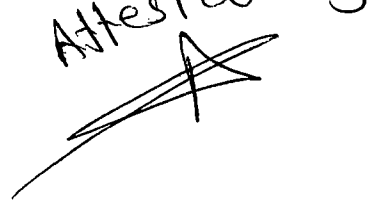
Banir A

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81	251	Khalida	04.12.1974	GGPS Sher Mohammad Kot	Do
82	252	Hasina Noor	01.04.1976	GGPS Wakila Jan Kot	Do
83	253	Rashida Bibi	17.09.1977	GGMS Mohammad Amin Kot	Do
84	254	Shaheen	03.04.1980	GGPS Noor Khan Kot	Do
85	255	Azra Noor	25.09.1980	GGPS Rasula Khan Kot Hasso Khel	Do
86	258	Basta Noora	04.04.1982	GGPS Jamal Khan Kot	Do
87	259	Misruna	15.01.1983	GGHS Khan Mir Kot	Do
88	260	Asifa Kanwal	26.03.1984	GGHS Khan Mir Kot	Do
89	261	Nazia Amin	28.04.1984	GGPS Jamal Khan Kot	Do
90	262	Shah Fahad Noora	05.05.1984	GGMS Malik Jan Bahadar Kot	Do
91	263	Iqbal Niaza	08.03.1985	GGPS Shamar Kot	Do
92	264	Khanau Shada	08.06.1985	GGMS Mohammad Noor Kot	Do
93	279	Qudsia Tabasam	01.10.1976	GGPS Mirzali Kot	Do
94	282	Refat Bannu	10.05.1980	GGPS Ajab Khan Kot	Do
95	283	Farah Bibi	06.05.1986	GGPS Mohammad Nawaz Kot Razmak	Do
96	284	Nasrin Rehman	02.05.1985	GGMS Laiq Zaman Kot Khatti Killa Miranshah	Do
97	285	Farhana Naz	02.04.1980	GGPS Mohammad Salam Kot	Do
98	286	Noreen Khan	02.12.1989	GGPS Sher Ali Boya	Do
99	301	Atya Jan	01.05.1988	GGPS Taj Mohammad Kot	Do
100	304	Shehnaz Salamat	15.02.1974	GGPS Ashraf Khan Shogi Spulga	Do
101	305	Asmat Shaheen	15.01.1984	GGPS Said Manoor Kot	Do

Benir Ahmad

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102	306	Zahida Bibi	10.12.1983	GGPS Mutabar Khan Kot	Do
103	309	Zuhra Bibi	10.02.1977	GGPS Rauf Khan Kot Mirali	Do
104	311	Shazia Andaleep	01.08.1980	GGPS Walimat Khan Kot	Do
105	313	Aqlim akhtar	15.11.1974	GGPS Sher Mohammad Kot	Do
106	314	Shamim Ijaz	08.11.1976	GGPS Khan Shashi Khel	Do
107	317	Mehnaz	14.05.1984	GGPS Bakhtazar Kot	Do
108	318	Mir Sahib Zada	07.02.1978	GGPS Gul Maroof Kot	Do
109	321	Qamrona	08.07.1984	GGPS Mohammad Tahir Kot	Do
110	322	Saira Khatoon	23.01.1986	GGPS Qattali	Do
111	326	Shakila	08.03.1981	GGMS Sharifullah Kot	Do
112	327	Khushnama	13.06.1982	GGPS Amir Rehman Kot	Do
113	328	Amina Begum	01.01.1986	GGPS Afsar Gul Kot	Do
114	329	Yasmin Begum	01.04.1976	GGPS Mushtaq Ahmad Kot	Do
115	336	Salma Bibi	01.04.1985	GGPS Najeem Khun Kot	Do
116	337	Asma Bibi	01.04.1985	GGPS Badshah Mir Khan Kot	Do
117	339	Suraya Jabeen	03.04.1986	GGPS Saifullah Kot	Do
118	340	Rubina Gul	02.01.1980	GGMS Mir Ghulam Kot	Do
119	341	Salma Gul	05.04.1984	GGPS Abdul Hameed Kot Hurmaz	Do
120	343	Saima Nek	15.10.1985	GGPS Lal Salam Kot	Do
121	344	Shah Naz Bibi	01.12.1987	GGPS Naeem Kot	Do
122	345	Naeem Akhtar	01.01.1989	GGPS Naeem Kot	Do
123	346	Shazia Zaman	12.04.1982	GGPS Dost Muhammad Kot	Do

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124	347	Saima Hameed	04.04.1990	GGPS Mohammad Wali Kot	Do
125	350	Umer Zada Bibi	21.02.1990	GGPS Muzamil Kot	Do
126	352	Rushan Dara	05.07.1989	GGPS Mohammad Noor Kot Khaddi	Do
127	354	Sufia Jabeen	06.06.1981	GGPS Noor Khan Kot	Do
128	357	Naeema Noor	27.09.1989	GGPS Fazal Illahi Kot	Do
129	358	Rahila	29.09.1989	GGPS Ayub Kot	Do
130	359	Hasina wazir	01.01.1991	GGPS Amir ullah spulga	Do
131	365	Salma	08.02.1979	GGPS Bakhta Din Kot	Do
132	387	Agnus Munawar	10.05.1982	GGPS Akhya Jan Kot Pai Khel Datta Khel	Do
133	388	Irfana Bibi	26.03.1982	GGPS Zar Khan Kot	Do
134	389	Nooreen	13.10.1985	GGPS Sahib Rahmman Kot	Do
135	390	Mehnaz Alam	16.10.1986	GGPS Sher Zali Khan Kot Tappi Miranshah	Do
136	391	Bas Khubana	24.01.1990	GGPS Asal Mar Jan Kot	Do
137	392	Damam Zada	24.01.1990	GGPS Mir Akbar Kot	Do
138	393	Gul Shada	08.04.1983	GGPS Noor Syed Rahman Kot Mussaki Mirali	Do
139	394	Zubia Bibi	04.04.1990	GGPS Shaheed Ullah Kot Dossali	Do
140	395	Halia	01.06.1990	GGPS Niaz Mohd	Do
141	396	Rubina	03.01.1991	GGPS Bakhtawar Kot Assad Khel Dossali	Do
142	397	Shahira	06.03.1984	GGPS Mohd Sadiq Kot	Do
143	404	Sherina	01.01.1987	GGPS Gul Zamin Kot	Do
144	405	Asma Khan	17.01.1988	GGPS Gul Manoor Kot	Do
145	407	Rafia Bibi	07.03.1989	GGPS Fazal Khan Kot	Do

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146	408	Kalim Dana	15.03.1989	GGPS Bakhtawar Kot Assad Khel Dossali	Do
147	412	Najia	07.08.1991	GGPS Niaz Mohd	Do
148	414	Aisha bibi	10.08.1988	GGHS Pir Aqal Zaman Kot	Do
149	415	Basnnora	12.09.1988	GGPS Gulmatl Kot Nawana	Do
150	416	Bibi Zaina	12.10.1989	GGPS Zar Wali Khan Kot	Do
151	417	Bibi Hamida	10.03.1990	GGPS Madak Kot	Do
152	419	Samrin	01.04.1989	GGPS Gul Muhammad Kot	Do
153	422	Rooh Niaza	03.04.1978	GGPS Zafar Ali Kot	Do
154	425	Memoona Noor	02.02.1990	GGPS Zahoor Din Kot	Do
155	426	Shabina	14.10.1985	GGPS Noor Saleh Din	Do
156	427	Zahida-un Nisa	01.01.1987	GGPS Afsar Khan Kot	Do
157	428	Asma Noor	03.06.1988	GGPS saifullah Kot	Do
158	431	Tehsina	11.08.1984	GGPS Rabab Kot Kirkanwan	Do
159	435	Safia	16.10.1988	GGPS Lal Jan Kot	Do
160	436	Sobia Mumtaz	01.01.1900	GGPS Gul Rauf kot	Do
161	437	Muzdalefa	26.10.1988	GGHS Pir Aqal Zaman Kot	Do
162	438	Sadia	12.02.1990	GGPS Marwat Khan	Do
163	439	Lubna	24.03.1990	GGPS Adam Khan Kot	Do
164	443	Salma	22.09.1990	GGPS Mir Wali Khan	Do
165	445	Zainaba	11.03.1991	GGPS Gulmat Kot Khushali	Do
166	446	Gul Shada	04.02.1992	GGPS Gul Sanar Kot	Do
167	447	Khalida Bibi	08.09.1992	GGPS Abidullah Shah Kot Mandi Khel Dossali	Do
168	448	Niab Tariq	01.04.1988	GGPS Zafar Ali Kot	Do

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169	449	Ome Omera	12.01.1994	GGPS Wakil Khan	Do
170	450	Salam Bibi	15.02.1984	GGPS Azimullah Kot	Do
171	451	Najma Naz	31.12.1981	GGPS Gul Mohammad Khel Kot	Do
172	453	Mehnaz	13.05.1987	GGPS Alam Gul Kot	Do
173	454	Saira Batti	12.05.1988	GGMS Laiq Zaman Kot Khatti Killa Miranshah	Do
174	455	Asma Bibi	08.08.1989	GGPS Saifullah Kot	Do
175	458	Sadaf Noorin	24.06.1990	GGPS Saeed Nawaz Kot	Do
176	459	Tanveer Akhtar	05.04.1973		Do
177	461	Roshan Pari	03.12.1981	GGPS Shahidullah Kot	Do
178	462	Ulfat Yasmin	01.01.1986	GGPS Kefayatullah Kot	Do
179	464	Shabina	15.05.1992	GGPS Mohd Karim Kot	Do
180	466	Sanam Javed	27.07.1987	GGPS Afsar Khan Kot	Do
181	466	Haleema	07.03.1987	GGPS Zahir Shah Shoi Khel	Do
182	467	Noorin	01.01.1973	GGPS Shah Nawaz Kot	Do
183	468	Zeenat Amber	12.04.1980	GGMS Mir Ghulam Kot	Do
184	469	Menhaja Bibi	10.11.1986	GGPS Hafizabad Hassu Khel	Do
185	470	Mahjabina Kaunwal	10.02.1988	GGPS Mohammad Karim Kot	Do
186	471	Shahzada	22.03.1990	GGPS Hassam ud Din	Do
187	472	Nusrat Begum	01.01.1970	GGPS Khan Zullah Palasin kot	Do
188	473	Zinat Begum	15.03.1988	GGPS Barakat Khan	Do
189	474	Asma Bibi	07.08.1989	GGPS Abdullah Shah Kot Isha Piran	Do
190	476	Sadia Naubat	02.04.1978	GGPS Bara Khan Razmak	Do

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191	477	Safia Naubat	03.03.1979	GGPS Bara Khan Razmak	Do
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Terms and Conditions.

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Government.
3. Their services can be terminated at any time, In case their performance is found unsatisfactory during probation period. In case of misconduct they will be preceded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service Books to the effect that if any over payment has made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

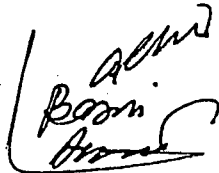

(Zait Ullah Khan)
District Education Officer
Miran Shah N.W. T.D

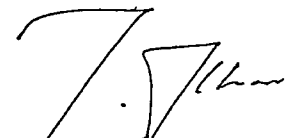
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27/12/2018.

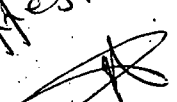
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Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director Education (FATA) KP Peshawar
4. T.D Accounts Officer N.W.A Miran Shah.
- 5... Official concerned.




District Education Officer
Miran Shah N.W. T.D.

Attested by


9	10	11	12	13		14	15
Signature and designation of the Head of the office or other attesting officer of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debit to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants

دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادل یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	دستخط افسر مجاز	سزا یا جزا یا غیر مناسب کارکردگی کا رہکارڈ
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	T. No.	Dt.	<p>Amount allowed of pay allowed:</p> <p>was 1⁶/₁₃ to 18⁹/₁₇ for $R=130826/-$</p> <p>due to upgradation from B-9 - to B-12</p> <p style="text-align: right;">Service verified w.e.f 01-12-04 To 30-11-018 from office record.</p> <p style="text-align: center;">T. No. 2/11/19</p> <p style="text-align: right;">DISTRICT EDUCATION OFFICER TRIBAL DISTRICT NORTH WAZIRISTAN</p>				
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		<p>Drawn Rs=3541/- Arames pay & allowances due to upgradation to BPS-12 to BPS-15 through system</p>	<p>Promotion</p> <p>Sanctioned accorded to the Promoted to B.P.S-15 vide D.E.O/N.W.T.D Enrol No. 13107-13 Dated 27-12-2008 S.No. 43</p> <p style="text-align: center;">T. No. 11/2/19</p> <p style="text-align: right;">DISTRICT EDUCATION OFFICER TRIBAL DISTRICT NORTH WAZIRISTAN</p>				
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<p>DE.O TD(NW)</p>	<p>30-11-018</p> <p>27-12-018 Promoted to BPS-15</p>	<p>A/gnc</p>	<p>Service verified w.e.f 01-12-2018 To 30-11-2019 from office record.</p>				
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	<p>DE.O TD(NW)</p>	<p>30/11/2019</p>	<p>A/gnc</p> <p>Attested by</p>				
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Anx-F (25)

Miran Shah-N.W.

S#:3180

P Sec:001 Month:May 2020
MN6014 -DEO Primary Education Nort
DEO PRIMARY EDUCATION NOR

Pers #: ~~50202111~~ Buckle:
Name: NOOR SHAD BEGUM
PRIMARY SCHOOL TEACHER
CNIC No.1420212846974
GPF Interest Applied
15 Active Temporary

NTN:
GPF #:
Old #:

MN6014 -125

PAYS AND ALLOWANCES:

0001-Basic Pay	29,420.00
1000-House Rent Allowance	2,349.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,000.00
2148-15% Adhoc Relief All-2013	550.00
2199-Adhoc Relief Allow @10%	389.00
2211-Adhoc Relief All 2016 10%	1,994.00
2224-Adhoc Relief All 2017 10%	2,942.00
Gross Pay and Allowances	48,884.00

DEDUCTIONS:

GPF Balance 103,846.00	Subrc: 2,890.00
3501-Benevolent Fund	600.00
3990-Emp.Edu. Fund KPK	125.00
4004-R. Benefits & Death Comp:	600.00

Total Deductions

4,215.00

44,669.00

D.O.B	LFP Quota: 4
15.02.1974	HABIB BANK LIMITED KARAK
16 Years 00 Months 013 Days	7900846103

AKS
A - 1

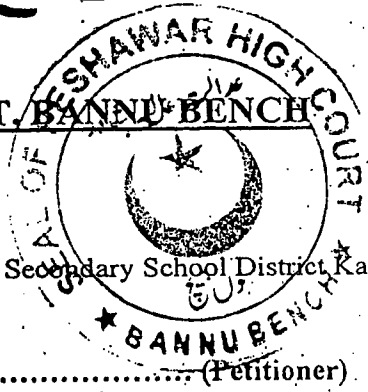
Anx - G

26

①
BEFORE THE PESHAWAR HIGH COURT, BANNU BENCH

W.P No. 763-B /2019

Mst : Noor Shad Begam Wife of Ahmad Nawaz R/O Near Higher Secondary School District Karak



..... (Petitioner)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education (E&S) Civil Secretariat Peshawar.
2. Director Education (E&S) Civil Secretariat, Peshawar.
3. Director Education (E&S) (Merged Districts / Areas) FATA Secretariat, Warsak Road Peshawar.
4. District Education Officer, North Waziristan Tribal District.
5. District Education Officer, (F) District Karak.

..... (Respondents)

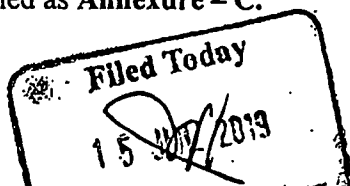
**WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973:-**

Respectively Sheweth:

1. That petitioner is Primary School Head Teacher (BPS – 15) appointed by the District Education Officer Tribal District North Waziristan in the year 2004 and serving as Primary School Head Teacher in Government Girls Primary School Jehangeer Kot Spulga North Waziristan Tribal District. Copies of appointment order and service certificate of petitioner are attached as Annexure – A.
2. That about 03 years ago, petitioner got married with Ahmad Nawaz S/O Rab Nawaz who is the permanent resident of District Karak and is Primary School Teacher in District Karak. After marriage, the petitioner is now living with her husband at District Karak. Copies of I.D Cards of petitioner and her husband are attached as Annexure – B.
3. That petitioner's husband is Primary School Teacher appointed in the year 1992 and now serving as Primary School Head Teacher at Government Primary School Municipal Committee Karak. Copies of appointment order and service certificate of petitioner's husband are attached as Annexure – C.

ATTESTED

EXAMINER
Peshawar High Court



Shind Attested by

4. That since marriage of the petitioner till date, the petitioner is residing with her husband in District Karak, the Petitioner wrote several applications to the respondents for implementation of spouse policy and to adjust / transfer the petitioner to the District Karak where her husband is severing the Government Education Department but respondents pay no heed to the applications of the petitioner. Copy of application of petitioner is attached as **Annexure – D.**
5. That various posts of Primary School Head Teacher are vacant in District Karak in different Government Primary Schools i.e Government Girls Primary School Tarkha Koi Gharbi, Government Girls Primary School Tarkha Koi and Government Girls Primary School New Abadi Sabir Abad. To this extent a certificate of availability of posts of Primary School Head Teacher from Sub Divisional Education Officer (Female) Karak is also attached as **Annexure – E.**
6. That despite availability of posts of Primary School Head Teacher in District Karak, the respondents are not willing to implement the spouse policy and transfer the petitioner to the District of her husband i.e District Karak.
7. That feeling aggrieved and having no other effective and speedy remedy available, the petitioner seeks the indulgence of this Hon able Court in its Constitutional Jurisdiction inter alia on the following amongst other grounds.

GROUND

- A. That petitioner has not been treated according to Law nor been treated equally before the Law.
- B. That petitioner's husband is serving as Primary School Head Teacher in District Karak whereas petitioner is serving as Primary School Head Teacher in Tribal District North Waziristan. As such petitioner has every right to be in the District of her husband i.e. Karak as per wedlock Policy but respondents are not willing to implement the wedlock policy which is illegal, unlawful and without lawful authority.
- C. That petitioner while serving as Primary School Head Teacher in Tribal District North Waziristan got married with the one Ahmad Nawaz S/O Rab Nawaz 03 years ago. Since marriage, petitioner is living with her husband in District Karak. But as petitioner is serving in Tribal District North Waziristan as Primary School Head Teacher, therefore, petitioner is facing lot of problems and cannot pay attention to her house and her children; petitioner wrote several applications to the respondents for implementation of wedlock policy and to transfer the petitioner to District Karak but respondents are not willing to do so.

ATTESTED

EXAMINER
Peshawar High Court
Bannu Bench

Filed Today

5 JUL 2019

Additional Registrar

[Signature]

Attested by
[Signature]

- D. That various vacancies of Primary School Head Teacher are vacant in District Karak and certificate from Sub Divisional Education Officer Office Karak is also available to this extent even than respondents are not willing to transfer the petitioner to the vacant posts available in Government Girls Primary School Tarkha Koi Gharbi, Government Girls Primary School Tarkha Koi and Government Girls Primary School New Abadi Sabir Abad.
- E. That petitioner has faced lot of problems in Tribal District North Waziristan during War on Terror and has lost lot of relatives and father / mother. As such petitioner has left no one in Tribal District North Waziristan to live with and petitioner's only shelter is to live with her husband. But respondents are not willing to implement the wedlock policy and to adjust the petitioner as Primary School Head Teacher in District Karak with her husband.
- F. That Fundamental Rights of the petitioner as enshrined in the Constitution of Islamic Republic of Pakistan, 1973 have been violated including the rights reserved in Article-04 and Article-25 of the Constitution.
- G. That Counsel for the petitioner may be allowed to raise additional grounds during the course of arguments.

It is, therefore, most humbly prayed that on acceptance of instant writ petition, respondents may very graciously be directed to implement the wedlock policy in case of petitioner and to adjust / transfer the petitioner as Primary School Head Teacher in District Karak in vacant school already existed in Government Girls Primary School Tarkha Koi Gharbi, GGPS Tarkha Koi Or GGPS New Abadi Sabir abad as the case may be. Any other relief which deems fit and proper according to circumstances of the case may also be granted.

INTERIM RELIEF

By way of interim relief, this Hon able Court may be pleased to restrain the respondents to fill one vacancy of Primary School Head Teacher in Government Girls Primary School Tarkha Koi Gharbi District Karak till final disposal of instant writ petition.

ATTESTED
 EXAMINER
 Peshawar High Court
 Bannu Bench

نور شاہد
 PETITIONER
 Through Counsel

SHAHID SALEEM MINA KHEL
 ADVOCATE HIGH COURT

Attested by

Filed Today
 15 JUL 2019
 Additional Registrar

29

JUDGMENT SHEET

PESHAWAR HIGH COURT, BANNU BENCH
(Judicial Department)

W.P No.763-B of 2019.

Mst. Noor Shad Begum
Vs
Govt. of Khyber Pakhtunkhwa
and others



JUDGMENT

Date of hearing: 26-02-2020

For Petitioner: Mr. Shahid Saleem Mina Khel advocate.

For Respondents: Mr. Shahid Hameed Qureshi, Addl: A.G.

SAHIBZADA ASADULLAH, J.- By way of instant Writ Petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973; petitioner Mst. Noor Shad Begum has invoked the Constitutional Jurisdiction of this Court, praying that:-

[Handwritten signature]

"It is therefore, most humbly prayed that on acceptance of this Writ Petition, respondents may very graciously be directed to implement the wedlock policy in case of petitioner and to adjust /transfer the petitioner at Primary School Head Teacher in District Karak in vacant school already existed in Government Girls Primary School Tarkha Koi Gharbi, GGPS Tarkha Koi Or GGPS New Abadi Sabir Abad as the case may be.

Any other relief, which deems fit and proper according to circumstances of the case, may also be granted.

ATTESTED
EXAMINER
Peshawar High Court
Bannu Bench

2.

In essence, the petitioner was appointed in the year

Attested by
[Handwritten signature]


2004 by the District Education Officer Tribal District North Waziristan (respondent No.4) and is serving as Primary School Head Teacher (BPS-15) in Government Girls Primary School Jehangeer Kot Spulga North Waziristan Tribal District; that the petitioner got married with one Ahmad Nawaz S/O Rab Nawaz, and is permanent resident of District Karak; that the petitioner is serving as Primary School Head Teacher at Government Primary School Jehangeer Kot Spulga North Waziristan Tribal District therefore, she has every right to be transferred in the District of her Husband, i.e. Karak in light of Wedlock/spouse policy. In this respect, she has moved various applications to the respondents but they are reluctant to implement the said policy, hence the instant Writ Petition.

3. Comments were sought from the respondents, which were submitted. In their parawise comments, respondents No.2 to 4 stated that the petitioner is working as a Primary School Head Teacher (PSHT) in BPS-15 and is serving as such at GGPS Jahangir Kot North Waziristan and that transfer of the petitioner on spouse policy is a legal right of the petitioner, while she has also been given NOC by the respondent No.5 for her transfer from district North Waziristan to District Karak. They have also submitted that at the moment there is a ban imposed by the Chief Minister KPK on all kind of transfer in the education department.

4. We have heard arguments in motion and perused the record thoroughly.

ATTORNEY

EXAMINER
Peshawar High Court
Bannu Bench

Attested by


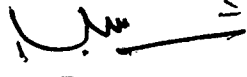
31

5. The claim of the petitioner is that she is serving as Primary School Head Teacher in the district North Waziristan Agency and wants her transfer to district Karak on the basis of spouse policy, as she has been married with Ahmad Nawaz S/O Rab Nawaz, who is the permanent resident of District Karak and is Primary School Teacher in district Karak. Respondents No. 2, 3 & 4 in their comments, have also categorically admitted by saying that the petitioner is having her legal rights of transfer from district North Waziristan Agency to the district Karak under the Spouse policy but due to imposition of Ban on all type of transfers in Education department, she could not avail such remedy at that time.

6. In view of above, the instant Writ petition is admitted and allowed with the direction to the respondents to consider the case of petitioner for her transfer as prayed for. Order accordingly.

Announced
26/02/2020
A/Awan*


CERTIFIED TO BE TRUE COPY


 6.5.2020

Examiner

Peshawar High Court Bannu Bench
Authorised Under Article 87 of
The Qanun-e-Shahadat Ordinance 1984
(D.B)

Hon'ble Ms. Justice Musarrat Hilali
Hon'ble Mr. Justice Sahibzada Asadullah


28/4/2020

Attested by


Anx - H

32

To

Honorable Director,
Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar

Subject: Request for the Transfer of the Applicant as per judgment of Peshawar High Court, Bannu Bench dated 26/02/2020

Respected Sir,

With due respect it is stated that applicant had filed W.P NO. 763-B/2019 for transfer under spouse policy from district North Waziristan to district Karak.

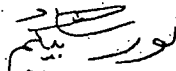
The aforementioned case has been accepted and allowed in favor of the applicant vide judgment dated 26/02/2020 by the honorable Peshawar High Court Bannu Bench. Whereby your good office has been directed to transfer the applicant from district North Waziristan to district Karak. Copy of Peshawar High Court Bannu Bench judgment dated 26/02/2020 along with petition is herewith attached.

It is therefore most humbly requested that applicant may kindly be transferred from GGPS Jehangeer Kot Spulga (New merged district North Waziristan) to district Karak and may kindly adjust the service of the applicant in one of the following schools in district Karak. (Fresh post availability is herewith attached).

1. Govt Girls Primay school Karak No.2
2. Govt Girls Primay school Rehmat Abad No.2

Your act of kindness will enable the applicant to perform her duty more efficiently. I shall be very thankful of you for this act of kindness.

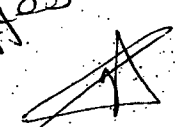
Dated: 07/05/2020


Noor Shad Begum

PSHT, Jehangeer Kot Spuiga North Waziristan

DEO North Waziristan

judgement of the
court may be
complied with in letter
of spirit.

Attested by


7/5/20

To

~~Anx-H~~

33

District Education Officer,
North Waziristan Tribal District.

Subject: Request for Initiating the process for the Transfer of the Applicant as per judgment of Peshawar High Court, Bannu Bench dated 26/02/2020

Respected Sir,

With due respect it is stated that applicant had filed W.P NO. 763-B/2019 for transfer under spouse policy from district North Waziristan to district Karak.

The aforementioned case has been accepted and allowed in favor of the applicant vide judgment dated 26/02/2020 by the honorable Peshawar High Court Bannu Bench. Whereby your good office has been directed to transfer the applicant from district North Waziristan to district Karak. Copy of Peshawar High Court Bannu Bench judgment dated 26/02/2020 along with petition is herewith attached.

It is therefore most humbly requested to initiate the process for transfer of the applicant as per judgment of honorable Peshawar High Court, Bannu Bench. Honorable Director Elementary and Secondary Education Department Khyber Pakhtunkhwa has also already been directed your good office to implement the court order in true letter and spirit. I shall be very thankful of you for this act of kindness.

Dated: 20/05/2020

نور شاد بیگم
Noor Shad Begum

PSHT, Jehangeer Kot Spulga North Waziristan

Attested by
★

Anx-1

34



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
PH No. 091-9210389, 9210938,
091-9210437, 9210957, 9210468
Fax 091-9210936

OFFICE ORDER.

Consequent upon the approval of Competent Authority Mst: Noor Shad Begum PST (BPS-12) GGPS Jehangeer Kot Spulga District North Waziristan is hereby transferred against the vacant post of PST(BPS-12)at GGPS Karak Sar District Karak in her own pay and BPS in the interest of public service with immediate effect.

Note:-

1. Charge report should be submitted to all concerned.
2. Her service record/documents will be checked before taking over charge.
3. Her seniority in District Karak will be determined at the bottom of the seniority list under the rules.

DIRECTOR.

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst:No. 719-25 /E-6/Vol:II/Transfer(F)General Dated Peshawar the 30/8 /2020.

Copy forwarded for information and necessary action to the:-

1. District Education Officer Karak w/r to his No.1909 dated 04.06.2020.
2. District Education Officer North Waziristan w/r to his No.5520 dated 02.60.2020.
3. District Accounts Officer Karak.
4. District Accounts Officer Karak.
5. Teachers concerned.
6. P.A to Director Elementary and Secretary Education Peshawar
7. Master file.

Deputy Director (Estt;)
Merged District

Attested by

[Signature]

[Signature]
30/8/20

I

K

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KARAK.

No 2306-10 /F-I/V-I/Trns.F/PST/KK Dated 09/07 /2020.

Copy of the above is forwarded to the:-

1. Director of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar w/r to his office Endst: No.717-25/E-6/Vol:II/Transfer(F) General dated 30/6/2020.
2. District Accounts Officer Karak/Miranshah North Waziristan.
3. District Education Officer (Female) North Waziristan w/r to his No.5520 dated 02/6/2020.
4. Sub-Divisional Education Officer (Female) Karak with the remarks that her pay will be released as & when her verification of Service Documents received.
5. Office copy.


DISTRICT EDUCATION OFFICER
(FEMALE) KARAK.

Anx- J

35

Director Education,
Elementary & Secondary Education Department KPK.

Subject: Departmental Appeal for Refixation of Pay in BPS-15

Respected Sir,

1. That applicant was enrolled as a PST in the year 2004 and was posted at GGPS Jahangir Kot Spulga. District North Waziristan. Since then she is performing her duty to the entire satisfaction of her supervisors. Order Copy attached for ready reference.
2. That vide under No. 13107-13/DEO/NWTD dated 27/12/2018, the appellant was promoted to PSHT BS-15 and her pay was fixed accordingly. Copy attached for ready reference
3. That appellant invoked the constitutional Jurisdiction of Honorable Peshawar High Court, Bannu Bench for her transfer to her native district under wed-lock policy. The Honorable Peshawar High Court was pleased to allow the writ petition and resultantly, appellant was transferred and posted at GGPS Karak Sar vide order No.719-25/E-6/Vol;11/Transfer(F)General dated. 30/06/2020
4. That upon transfer the pay of appellant was fixed against BS -12
5. That as per provision of section 10 of KPK civil service act 1973; pay of a civil servant cannot be adversely affected on ground of transfer.
6. That appellant was/is serving in BPS-15 before her transfer on regular basis therefore she is entitle for protection of her pay scale.
7. That reversion of appellant from BPS-15 to BPS-12 is penalty and against all norms of justice, fair play and equality and also amounts the violation of guaranteed rights protected under Article 3, 4, 10A, 18,25 and 27 of the continuation of Pakistan 1973.
8. That in pursuance of Elementary and Secondary Department Khyber Pakhtunkhwa notification No. SO(B&A)/1-18/E&SE/2012 dated11-07-2012, the Agency Education Officer North Waziristan Agency, Miranhaha vide partial order promoted 67 PST (Female) BPS-14 to the post of PSHT (BPS-15) with effect from 01-07-2012 (copy of Notification No. 1376-80/P.T.C (F) dated 05-12-2016. Copy attached as Annexure B.
9. That in pursuance of the said Notification SO (B&A)/1-18/E&SE/2012 dated11-07-2012, of Elementary and Secondary Department Khyber Pakhtunkhwa, the district Education Officer. North Waziristan promoted a number of 191 PST (Female), BPS-12 to PSHT including the applicant with immediate effect from the date of taking over charge, vide Notification No.13107-13/DEO/N.W.T.D dated 27-12-2018.
10. That both the notifications (No. 1376-80/P.T.C (F) dated 05-12-2016 and No.13107-13/DEO/N.W.T.D dated 27-12-2018) have been issued under the same Notification i.e. No. SO (B&A)/1-18/E&SE/2012 DATED Peshawar, 11-07-2012 with effect from 1-07-2012 and 28-12-2018 respectively. This act of the concerned District Education is based on discrimination and unlawful.

Adopted by

36

In view of the above explained position your honor may graciously be pleased to direct the concerned to refax the pay of appellant in BPS-15 with effect of her transfer and release the same accordingly with all back benefits. Valuable right of the applicant is involved in the instant case therefore it is kindly requested to treat the applicant equally in accordance with law.

Regards

نوور شاد بیگم

Noor Shad Begum
Ex-PSHT Jahangir Kot
District North Waziristan

Dated:- 15-03-21

Present Mail Address :- Noor Shad Begum w/o

Ahmad Nawaz - Dist, Tehsil P.O Karak

Near: G.H.S.S. Karak Cell No. 0333-9715047 (P.P)

Arrested by
A

Anx-K

(37)



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
PH No. 091-9210389, 9210938,
091-9210437, 9210957, 9210468
Fax 091-9210936

No. _____/E-6/Vol:II/Appeal (F) Gen Dated _____/2021.

To,
The District Education Officer
North Waziristan.

Subject: - DEPARTMENTAL APPEAL FOR REFIXATION OF PAY IN BPS-15

Memo:-

I am directed to refer the subject noted above and to enclose herewith a copy of appeal in respect of Mst Noor Shad Begum Ex-PSHT Jahangir Kot District North Waziristan and to ask you to inform the teacher that as per policy in vogue you are not entitled for the same.

Encl: A.A.

S/2
Deputy Director (Estt;)
Merged Areas

Endst: No. 5204-05 /-

Dated Pesh: the 05/04/2021.

Copy forwarded to the:-

1. Mst Noor Shad Begum wife of Ahmad Nawaz District & Tehsil P.O Karak near GGSS Karak.
2. PA to Additional Director, (Estab) Local Directorate.

Willam
Deputy Director (Estt;)
Merged Areas
5/4/2021
5/4/21

A. K.
Received today
28-04-2021

Attested by
[Signature]

"B"

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

No.

23

Appeal No. of 20

5797
Appellant/Petitioner
MST: Noor Shad Bagum

Respondent
The Director (ERSE) Govt. KP

Notice to: —

The Director (ERSE) Govt. KP

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20

Aug 21

22/15

(for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

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

No.

Appeal No. 5797 of 20 21

Mrs. Noor Shad Begum Appellant/Petitioner

The Director (ERIE) Govt. KPK Respondent

Respondent No. 5

Notice to: —

The Deputy Director (Esub.) Merged Areas Education Directorate Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/10/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

R/S
6/10/21

Copy of appeal is attached. Copy of appeal ~~has already been sent to you vide this~~ office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 24/10

Day of Friday 20 21

(For Reply)

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"A"

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

No. APPEAL No. 5797 of 20 21

Mst. Noor Shad Begum

Appellant/Petitioner

Versus

The Director Education (ERSE) KP

RESPONDENT(S)

Notice to Appellant/Petitioner

Additional Advocate General
Service Tribunal Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication affidavit/counter affidavit/record/arguments/order before this Tribunal on 28/9/2022 at 9: am

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.

AAG For Making Sure the presence of Respondents and comments on or Before the Next Date.

Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Handwritten signature]
14/09/2022