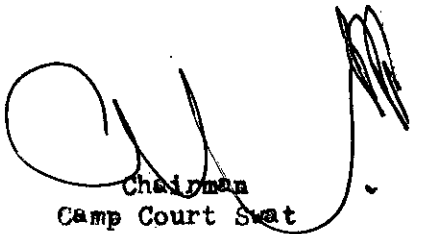


01.9.2014

Mr. Fazal Wahab, on behalf of the appellant
and Mr. Muhammad Ishaq, Senior Clerk on behalf of official
respondents No. 1 to 3 with Mr. Muhammad Zubair, Sr. GP present.
Representative of the respondents submitted copy of relevant
record from service book of the appellant, showing entry
with regard to forgoing of promotion by the appellant,
which is placed on file. To come up for further preliminary
hearing at camp court Swat on 6.11.2014.


Chairman
Camp Court Swat

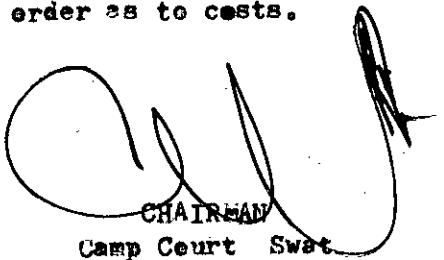
6.11.2014

No one is present on behalf of the appellant.
Mr. Muhammad Ishaq, Senior Clerk on behalf of respondent
No. 2 with Mr. Muhammad Zubair, Sr. GP for official respondents
present. Representative of respondent No. 2 submitted
application for withdrawal of appeal on behalf of attorney
for the appellant, Fazal Wahab.

In view of the application, the appeal is
dismissed as withdrawn, with no order as to costs.

ANNOUNCED

6.11.2014


CHAIRMAN
Camp Court Swat

1950年12月15日

1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日

1950年12月15日

1950年12月15日

1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日
1950年12月15日

1950年12月15日
1950年12月15日

1950年12月15日

1950年12月15日

5:5:2014, Mr. Fazal Wahab on behalf of the appellant present, but requested for adjournment due to strike of the Bar. Another last chance is given for arguments on maintainability of the appeal at camp court Swat on 7:7:2014.

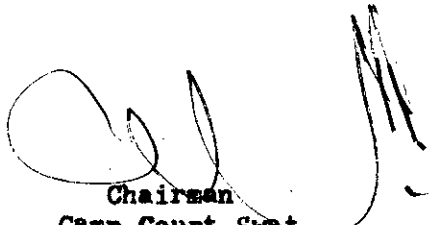
J.P.S.P.


Chairman
Camp Court Swat

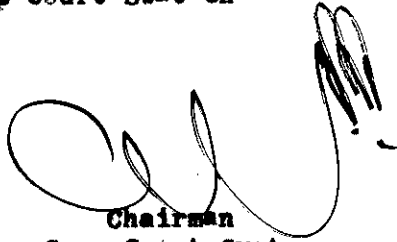
Chairman
Camp Court Swat

7.7.2014

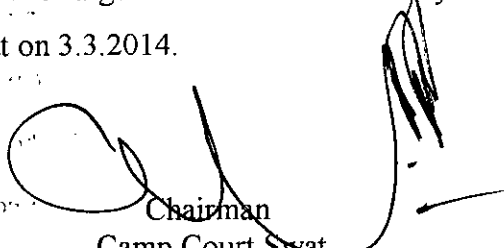
Counsel for the appellant present, and referred to his application for correction of the word 'adjustment' and its substitution with the word 'posting'. Since the appeal is at the initial stage, the application is allowed and correction be made in the appeal accordingly. From the preliminary arguments of the learned counsel for the appellant, there is a need to issue a pre-admission notice to the DEO(F) Swat at Saidu Sharif (Respondent No.3) for production of complete record of posting/transfer and availability of post of PSHT (BPS-15) in Union Council Muhammad Gul Shaheed Mingora. Notices be issued accordingly to respondent No.3 as well as Govt. Pleader for further preliminary hearing at camp court Swat on 01.9.2014.


Chairman
Camp Court Swat

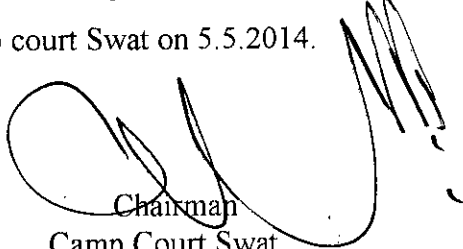
4.11.2013 Mr. Fazal Wahab, uncle of the appellant, on behalf of the appellant present, and requested for adjournment due to non-availability of the learned counsel for the appellant. To come up for arguments on maintainability of the appeal, positively, at camp court Swat on 6.1.2014.


Chairman
Camp Court Swat

06.01.2014 Counsel for the appellant present, but requested for adjournment on the ground that his ailing father is admitted in the hospital. Another chance is given for arguments on maintainability of the appeal at camp court Swat on 3.3.2014.


Chairman
Camp Court Swat

3.3.2014 Mr. Fazal Wahab on behalf of the appellant present, but requested for adjournment. A last chance is given for arguments on maintainability of the appeal at camp court Swat on 5.5.2014.


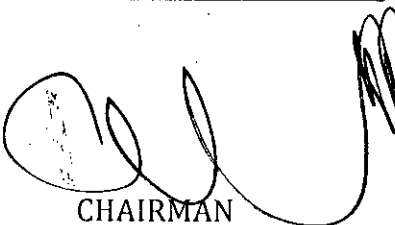
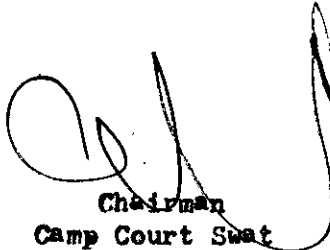

Chairman
Camp Court Swat

Form- A

FORM OF ORDER SHEET

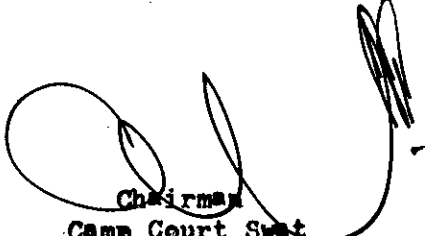
Court of _____

Case No. 900/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/05/2013	<p>The appeal of Mst. Abida resubmitted today by Mr. Fazli Rabbi Khan Tawaskhail Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Touring Bench Swat for preliminary hearing to be put up there on <u>03-06-2013</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2	16-5-2013	
3.	3.6.2013	<p>Counsel for the appellant present and requested for adjournment in order to prepare arguments on maintainability of the appeal in view of the fact that the appeal, in essence, is for adjustment of the appellant against some particular post. To come up for preliminary hearing at camp court Swat on 01.7.2013.</p> <p style="text-align: right;"> Chairman Camp Court Swat</p>


01.07.2013

Counsel for the appellant present and moved application for deletion of the word 'adjustment' and its substitution by the word 'posted'. Since the appeal is at the initial stage, and no proceedings have yet taken place, the application is accepted and the word 'posted' is substituted for the word 'adjustment'. The learned counsel for the appellant requested for adjournment. To come up for preliminary hearing, including arguments on maintainability of the appeal, at camp court Swat on 12.8.2013.


Chairman
Camp Court Swat

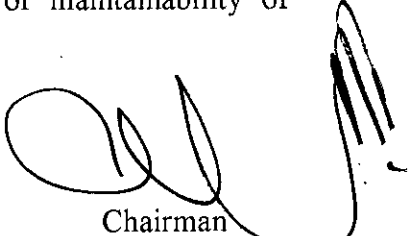
7.8.2013

Due to Eid-ul-Fitar, case is adjourned for proceedings as before, on 23.9.2013


Reader

23.9.2013

No one is present on behalf of the appellant. To come up for preliminary hearing on the question of maintainability of appeal at camp court Swat on 04.11.2013.



Chairman

The appeal of Mst. Abida daughter of Fazal Karim Distt. Mingora received today i.e. on 29/04/2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellant.
- 2- Copies of Notification No.SOB and AC/I-18/E&SE/2012 dt. 11.7.2013 and SO(FR/FD/10-22(e)2010 dated 16.7.2012 mentioned in the heading of the appeal are not attached with the appeal which may be placed on it.
- 3- Annexures of the appeal may be attested.
- ④- Most of dates mentioned in the memo of appeal are not matching with the dates of documents.
- 5- Affidavit may be got attested by the Oath Commissioner.
- 6- Eight more copies/ set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 693 /S.T,

Dt. 30/04 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

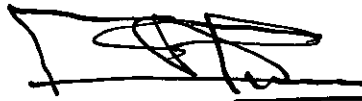
MR. FAZALI RABBI KHAN TAWASKHAIL ADV.
HIGH COURT MINGORA SWAT.

P.T.O

9-05-2013

Respected Sirs.

objections No-1-3-5 and 6 are Removed,
and objection No-4 is not valid and
according to the objection No-2, the
Document concerned Notification
No- 50 (B & A) / 1-18 / E & SE / 2012
Dt-11⁷/₂₀₁₂ is attached Already and
place on file on page No. 8, which is
Annexure-B. Therefore Re-file today
on 09-5-2013 once again Sirs.



Fazli Rabbi Khan
(Talwarbhel)
Advocate For
the petitioner

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTOONKHWA, PESHAWAR, CAMP COURT AT
GULKADA, SAIDU SHARIF SWAT.

Service Appeal No. 900 /2013;

Mst. Abida Appellant.

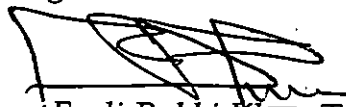
VERSUS

Secretary to Govt: of KPK & 04 others Respondents.

INDEX

S. #	Description of Documents	Annexure	Pages
1.	Appeal with certificate.	---	1-4
2.	Affidavit.	---	5
3.	Memo of addresses.		6
4.	Copy of order dated 01/01/1990	A	7
5.	Copy of Notification Endst: No.569-74 dated 27/02/2013.	B	8-23
6.	Copy of departmental appeal.	C	24
7.	Copy of office order Endst: No.1182-86 dated 04/04/2013.	D	25-26
8.	Copy of Transfer & posting policy.	E	27-
9.	Power of attorney.	---	28
10.	Wakalat Nama	---	29

Appellant
Through counsel



Fazli Rabbi Khan Tawaskhail
Advocate High Court, 23/4/2013
Saeed Law Chamber, New Road,
Mingora, Swat.
Cell # 0345-8907252.

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTOONKHWA, PESHAWAR, CAMP COURT AT
GULKADA, SAIDU SHARIF SWAT

Service Appeal No. 900 of 2013

A.W.F. Peshawar
29-11/13

Mst. Abida daughter of Fazal Karim R/o Malook Abad, Mingora,
Tehsil Babozai District Swat.Appellant

VERSUS

1. Secretary Government of Khyber Pakhtoonkhwa, Education Department at Peshawar.
2. Director Education, Khyber Pakhtoonkhwa at Peshawar.
3. District Education Officer (Female) Swat at Saidu Sharif;
4. Mst. Norina Bibi, PSHT, GGPS Muhamamd Gul Shaheed Mingora, District Swat.
5. Mst. Jehan Begum, PSHT, GGPS Muhamamd Gul Shaheed Mingora, District Swat.
6. Mst. Zia Kalsoom daughter of Bakht Biland Village Bar Kalay, Saidu Sharif, Tehsil Babozai (GGPS Tindodag Swat)

Appeal u/s 4 of Service Tribunal Act 1974, to the effect that on refuse to respondent No. 4 avail the promotion granted to the respondent No.4 vide Notification No. SOB and AC/1-18/E&SE/2012 dated 11-07-2013 and financial Department Endst: No. SO(FR/FD/10-22(e)/2010 dated 16-07-2012, the post retained by respondent No.4 at GGPS Muhammad Gul Shaheed being vacant the appellant being domicile of Said union council be adjusted against the Said vacant post, which has been left by the respondent No.4 and subsequently adjusting respondent No.5 against the said post be declared illegal, violative of Rules and based on ill-will & mala fide and consequently the subsequent readjustment granted to the appellant in consequences of the departmental appeal filed by the appellant vide Endst: No. 1182-86/promotion/PST/F dated 04/07/2013 be modified to the extent of the appellant and she may kindly be readjusted in its domicile union council Malook Abad, Mingora and or the appellant be adjusted at GGPS Tindodag because the appellant is Senior to Respondent No.6 which is a **legal right of the appellant/petitioner**. Any other relief deemed fit in the **circumstances of the case** may also be granted in favour of the appellant in the best interest of justice.

29/11/13

re-submitted to and filed,

16/5/13

Respectfully Sheweth:

The appellant submits as under:

1. That appellant has been appointed vide order bearing Endst: No.4162-73/G-1/PTC dated 01/01/1990 against the post of PTC in the year 1990 and the appellant is discharging her duties to the best of her ability and competency. (Copy of appointing order is Ann: "A").
2. That with the passage of time, the appellant was transferred from one school to another, and the appellant being civil servant was discharging her duties efficiently and no complaint has ever been made against the appellant during the term of her service. (Copy of Notification dated 27/02/2013 is Annexure "B").
3. That after introduction of the transfer and promotion policy the appellant ignored and consequently on hue and crying of the appellant by filing departmental appeal, the appellant were transferred by allowing her appeal but instead of accrual of vacancy in the union council of the appellant consequent upon the refusal of the respondent No.3 the post at union council GGPS Muhammad Gul Shaheed Mingora Tehsil Babozai, District Swat. The appellant is entitled to be readjusted against the said post in the light of transfer & posting policy, files the instant appeal inter alia on the following grounds (Copy of departmental appeal is Annexure "C" while the impugned order dated 04/04/2013 passed on the departmental appeal is Annexure "D", Transfer & posting policy is Annexure "E"):-

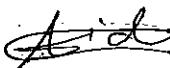
GROUNDS:

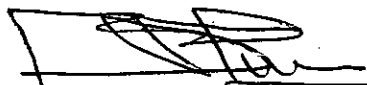
- i. *That the appellant has not been transferred according to the law.*
- ii. *That after accrual of the vacancy in the union council Malook Abad to which the appellant belongs, it was a vested right of the appellant to be readjusted against the said post in said union council at GGPS Muhammad Gul Shaheed.*
- iii. *That the office order whereby the appellant is readjusted in consequences of the allowing appeal of the appellant further requires to be modified to the extent that the appellant be readjusted in the said union council Malookabad whereas the Notifications bearing Endst: No.SO(B&A)/1-18/E&SE/2010 dated 11/07/2012 and Endst: No.SO(FR)/FD/10-22(E)/2010 dated 16/07/2012, whereby the appellant has been ignored is required to be over sighted, because the appellant being otherwise entitled and has been ignored to the extent of said office order is illegal, unwarranted, against the rules and transfer & posting policy.*
- iv. *That the appellant being female and in the existent situation prevailing in the area and the fear of terrorism adjusting the appellant in her own union council is an act supported by transfer & posting policy rules and in the instruct of justice.*
- v. *That in alternative, the appellant may please be adjusted on the post expected to be vacant on the retirement of Mst.Tasnim Sultana at GGPS Haji Baba Mingora, Swat, on 14/05/2013.*

(4)

- vi. That any other grounds not specifically raised shall be argued at the time of arguments with the leave of this Hon'ble court.

It is, therefore, very humbly prayed that on acceptance of this appeal, the office order bearing Endst: No. 1182-86/Promotion/PST/F dated 04/04/2013 may graciously be modified to the extent that the appellant may kindly be readjusted in her own union council Malookabad Mingora at GGPS Muhammad Gul Shaheed or in alternative, the appellant may please be adjusted on the post expected to be vacant on the retirement of Mst. Tasnim Sultana at GGPS Haji Baba Mingora, Swat, on 14/05/2013 as per Government posting & transfer policy. Any other remedy which is just, appropriate & efficacious may also be awarded if specifically not been prayed for in the instant appeal, but the interest of justice demand so.

Appellant
Through counsel 



Fazli Rabbi Khan Tawaskhail
Advocate High Court, 23/4/2013
Saeed Law Chamber, New Road,
Mingora, Swat.
Cell # 0345-8907252.

CERTIFICATE

It is certified that no such like other appeal of the same subject matter has earlier been instituted by the appellant and this the first ever appeal against the impugned office order as per information provided by the appellant to me.



Fazli Rabbi Khan Tawaskhail
23-4-13
ADVOCATE HIGH COURT

5

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTOONKHWA, PESHAWAR, CAMP COURT AT
GULKADA, SAIDU SHARIF SWAT.

Service Appeal No. _____/2013;

Mst. Abida Appellant.

VERSUS

Secretary to Govt: of KPK & 04 others Respondents.

AFFIDAVIT

*It is solemnly affirm & declare on oath that contents of
the above tilted appeal are true & correct to the best of my knowledge
& belief and nothing has been kept concealed from this Hon'ble
Tribunal as per information provided by the appellant to me.*

Deponent



Fazli Rabbi Khan Tawaskhail
ADVOCATE HIGH COURT.

23/4/2013

5

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTOONKHWA, PESHAWAR, CAMP COURT AT
GULKADA, SAIDU SHARIF SWAT.

Service Appeal No. _____/2013;

Mst. Abida Appellant.

VERSUS

Secretary to Govt: of KPK & 04 others Respondents.

MEMO OF ADDRESSES

Address of Appellant:

Mst. Abida daughter of Fazal Karim R/o Malook Abad,
Mingora, Tehsil Babozai, District Swat, through attorney No-1
FAZAL WAHAB Cell-No-0344 96215 25
No-2- ANWAR SHAH Cell-No-03361110030
Cell # 0312 957 0030

Addresses of Respondents:

- (1) Secretary to Government of Khyber Pakhtoonkhwa,
Education department at Peshawar;
- (2) Director Education, Khyber Pakhtoonkhwa, at Peshawar;
- (3) District Education Officer (female) Swat at Saidu Sharif;
- (4) Mst. Norina Bibi, PSHT, GGPS Muhammad Gul
Shaheed Mingora, District Swat;
- (5) Mst. Jehan Begum, PSHT, GGPS Muhammad Gul
Shaheed, Mingora, District Swat.

Appellant
Through counsel



Fazli Rabbi Khan Tawaskhail
Advocate High Court, 23/4/2013
Saeed Law Chamber, New Road,
Mingora, Swat.
Cell # 0345-8907252.

OFFICE OF THE DISTT. EDUCATION OFFICER (FEMALE) SWAT SAIDU SHARIF.

APPOINTMENT:-

The following Matric Pass Candidates are hereby temporarily appointed against P.T.C. posts in the Schools mentioned against their names in B.P.S. NO. 7 @ Rs. 750/-P.M. fixed plus usual allowances as due and admissible to them under the rules with effect from the date of their taking over charge on the terms and conditions given below in the interest of public service:-

<u>S.No.</u>	<u>Name & Father's Name.</u>	<u>School where appointed.</u>	<u>Remarks.</u>
1.	Thaslim Akhtar D/O Noor Ali Khan Saidu.	GCPS Jokhtai.	
2.	Shuhab Majeed D/O Majeed Khan	" Sukar Kats.	
3.	Rashida Bibi D/O Faqir Mohammad	" Bara Samai.	
4.	Bakht Buhar D/O Fazal Rahem. Madayan.	" Bara Samai Fazal Gar	
5.	Yasmin D/O Ataulah Mingora.	" Bar Shawat.	
6.	Saeeda Zamrood D/O Shamshad Hussain.	" Lil Bar.	
7.	Nasreen Begum D/O Mohammad Din.	" Jokhtai.	
8.	Jamila D/O Fazal Ghani.	" Gall.	
9.	Abida D/O Fazal Karim.	" Aghal.	
10.	Bakht Wesala D/O Sultanat Khan.	" Gall.	
	TERMS & CONDITIONS: 1. Abdul Qayum.	" Gall.	
	2. No. T.A./P.A. is allowed being first appointment.	" Fazal Beg Garai.	

1. Charge reports should be submitted to all concerned.
2. The appointment is made purely on temporary bases and is liable to termination at any time without assigning any reasons from either sides.
3. The candidates are required to produce their health and age Certificates from the Medical Superintendent Saidu X Group of Hospital Swat.
4. The Sub Divl: Education Officer (F) Swat /Concerned is required to check the original documents of the candidates concerned before handing over charge.
5. They should not be given the charge if their age exceeds 28 years and below 18 years.
6. They are required to take over charge within 15 days of the issue of this order failing which the order should stand automatically cancelled.

Attested

(MISS SHAD BEGUM)
 DISTT: EDUCATION OFFICER (F)
 SWAT, AT SAIDU SHARIF.
 Dated / / 1990.

*Fazli Rabbani
 Rawastehel
 Advocate*

Endst: No. 4162-73 / G-I / PTC

Copy of the above is forwarded for information and necessary

1. The Sub Divl: Education Officer (F) Swat at Saidu Sharif.
2. The Distt: Accounts Officer, Swat at Saidu Sharif.
3. The Headmistress, concerned.
4. The Candidate concerned.

[Signature]
 Distt: Education Officer (F)
 Swat at Saidu Sharif.

District Education Officer (Female) Swat at Saidu Sharif
Phone #09469240440
Fax #09469240440



کالج فوٹو سٹیٹ سروس
 جہانزیب کالج سیدو شریف سوات
 سوات - 03018533195

NOTIFICATION

Consequent upon the recommendation of the Departmental promotion Committee and in pursuance of the Government of Khyber Pukhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&SE/2012 dated 11-07-2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female PST BPS 14 are hereby promoted to the post of Primary School Head Teacher (PSHT) BPS 15 (RS: 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 in the Schools noted against each.

Total No of PST (Female) Posts duly verified by the DAO Swat	1845
Share of Primary School Head Teacher(PSHT) Posts	0487
Share of Promotion 100%	0487
Promoted to the Post of PSHT BPS 15 (Female)	0487

S.No	S/L.No	Name of Teacher		Present School	Date of Birth		Proposed School
1	1	Shahi Merman	GGPS	Shagai	01/04/1954	GGPS	Shagai
2	2	Nasim Akhtar	GGPS	Saidu No 2	11/04/1956	GGPS	Saidu No 2
3	3	Anwar Bgum	GGPS	Matta	11/04/1957	GGPS	Matta
4	4	Bakhtoon Begum	GGPS	Malook Abad	01/01/1958	GGPS	Malook Abad
5	5	Nasim Akhtar	GGPS	Banr	20/12/1958	GGPS	Banr
6	7	Nasrin Hina	GGPS	Barikot	05/01/1961	GGPS	Barikot
7	8	Jehan Ara	GGPS	Dehray Monglor	01/06/1961	GGPS	Dehray Monglor
8	14	Shahi Begum	GGPS	Mingora	02/01/1961	GGPS	Mingora
9	15	Raham Taj	GGPS	Kanju	01/05/1963	GGPS	Kanju
10	16	Shaheen Akhtar	GGPS	Afsar Abad	02/02/1961	GGPS	Afsar Abad
11	18	Jamil Akhtar	GGPS	Saidu No 2	01/01/1958	GGPS	Sangar
12	21	Bakhte Rja	GGPS	Goligram	01/04/1964	GGPS	Goligram
13	23	Altaf Begum	GGPS	Madyan	05/03/1954	GGPS	Madyan
14	26	Nasim Akhtar	GGPS	Faiz Abad	01/05/1954	GGPS	Faiz Abad
15	28	Norina Bibi	GGPS	M.G.Shahed	01/09/1962	GGPS	M.G.Shahed
16	29	Shamim Begum	GGPS	Kanju	17/08/1965	GGPS	Dardyal
17	30	Nighat Akhtar	GGPS	Shana Krapa	01/04/1965	GGPS	Shana Krapa
18	32	Zohra Begum	GGPS	Saidu No 2	14/08/1962	GGPS	Parona

Attsted


9-5-13

Fazli Rabbar
 Advocate
 Counsel for the
 Petitioners

9

19	33	Nargas	GGPS	Chil Shagai	03/05/1964	GGPS	Chil Shagai
20	34	Shahi Begum	GGPS	Qambar	01/01/1960	GGPS	Qambar
21	35	Hussan Ara	GGPS	Mairagai	05/03/1953	GGPS	Mairagai
22	36	Tasnim Sultana	GGPS	Haji Baba	14/05/1953	GGPS	Haji Baba
23	37	Zeenat Sultana	GGPS	Islampur	27/04/1954	GGPS	Islampur
24	39	Noor Mahal	GGPS	Balogram,	05/04/1956	GGPS	Balogram,
25	43	Zahida Ishrat	GGPS	Roshan Abad	01/04/1965	GGPS	Roshan Abad
26	46	Bibi Aisha	GGPS	Charbagh 2	21/03/1958	GGPS	Charbagh 2
27	47	Riaat Begum	GGPS	LoiBanr	23/03/1960	GGPS	LoiBanr
28	48	Naheed Begum	GGPS	Afsar Abad	22/04/1966	GGPS	Doop Manai
29	49	Shamim Ara	GGPS	Goligram	01/04/1966	GGPS	koo Malam Jaba
30	50	Shaheen Begum	GGPS	Haji Baba	26/02/1966	GGPS	Jabagai Qalagai
31	51	Shahi Sultana	GGPS	Saidu No 2	01/04/1966	GGPS	Toor thot
32	52	Nasim Akhtar	GGPS	Landakay	15/12/1966	GGPS	Landakay
33	53	Balqis Akhtar	GGPS	Fatehpur	07/11/1955	GGPS	Fateh Pur
34	54	Zobeda Khatoon	GGPS	Haji Baba	05/01/1958	GGPS	Look Maira
35	55	Parveen Akhtar	GGPS	Nawa Kalay	02/01/1961	GGPS	Nawa Kalay
36	56	Shaheena Bibi	GGPS	Gulbandai	03/01/1962	GGPS	Gulbandai
37	57	Rahmat Begum	GGPS	Shaheen Abad	14/02/1963	GGPS	Shaheen Abad
38	58	Nagina Akhtar	GGPS	M.G Shaeed	06/10/1963	GGPS	Nawagai
39	61	Shamshad Begum	GGPS	Saidu No 2	14/08/1964	GGPS	Spinai Oba
40	62	Hussan Buhar	GGPS	Dangram	10/09/1964	GGPS	Dangram
41	63	Jehan Begum	GGPS	M.G.Shahed	02/03/1964	GGPS	Main Kalay Tajarai
42	65	Tasleem Akhtar	GGPS	Shah Dherai	01/04/1961	GGPS	Shahderay
43	66	Zuhra Begum	GGPS	Panr	18/03/1967	GGPS	Panr
44	67	Fazilat Shaheen	GGPS	Shadara	11/09/1962	GGPS	Khwar Kowtai
45	69	Shala Naz	GGPS	Rahim Abad	14/02/1955	GGPS	Rahim Abad
46	71	Mahi Talat	GGPS	Kota	05/03/1959	GGPS	Kota
47	72	Hamida Begum	GGPS	Rahim Abad	04/04/1959	GGPS	Asharbanr Monglor
48	73	Shahe Sultana	GGPS	Banr	01/06/1959	GGPS	Shamilai
49	74	Yasmin Layaq	GGPS	Malook Abad	07/11/1959	GGPS	kishwra
50	75	Hameeda Ayub	GGPS	Gul kada	01/01/1960	GGPS	Gul kada
51	76	Rahat Pari	GGPS	Kabal	15/03/1960	GGPS	Kabal


Attested

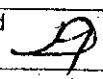


Fazli Rabbi
Advocate

A

52	78	Farida Akhtar	GGPS	Amankot	20/04/1961	GGPS	Amankot
53	80	Parveen Asma	GGPS	Mingora	01/09/1962	GGPS	Akbar Abad
54	81	Bakht Zahira	GGPS	Nawa Kalay	23/03/1958	GGPS	Sarbala
55	85	Ahmadia	GGPS	Shaheen Abad	07/03/1956	GGPS	Asharai Malam
56	88	Refat Pari	GGPS	Amankot	23/12/1956	GGPS	Nimogram
57	89	Sahiba Begum	GGPS	Ghalegay	01/04/1957	GGPS	Ghalegay
58	92	Bibi Rahima	GGPS	Qambar	12/02/1958	GGPS	Sangar Monglor
59	93	Bacha Begum	GGPS	Roringar	16/04/1958	GGPS	Kalay Ghar
60	94	Rukhsar Begum	GGPS	Barikot	10/02/1959	GGPS	Notmaira
61	95	Pari	GGPS	Haji Baba	01/03/1959	GGPS	Sabr Shah
62	96	Hussan ara	GGPS	Faiz Abad	01/03/1959	GGPS	Kas Khas
63	97	Mumtaz Mahal	GGPS	Amankot	20/04/1959	GGPS	Mangar Kot
64	97a	Nuzhat Sultana	GGPS	Roringar	03/01/1960	GGPS	Gamseer
65	99	Mehron Nisa	GGPS	Gulibagh	11/12/1963	GGPS	Gulibagh
66	100	Balanishta	GGPS	Batora	11/04/1965	GGPS	Batora
67	101	Nasim Begum	GGPS	Qambar	30/06/1966	GGPS	Asharbanr Charbagh
68	103	Bakhta Wara	GGPS	Banr	15/12/1965	GGPS	Shagai Kabal
69	104	Zeenat Begum	GGPS	Sangota	01/03/1968	GGPS	Sangota
70	105	Akhtar Begum	GGPS	Amankot	10/04/1968	GGPS	Shaltaloo
71	106	Naheed Akhtar	GGPS	Sangota	04/12/1964	GGPS	Kot Doshay
72	107	Roshan Ara	GGPS	Zola Dher	08/03/1968	GGPS	Zola Dher
73	108	Hamida Begum	GGPS	Qamber	18/06/1964	GGPS	Rahatpur Azadbanda
74	111	Mastoria	GGPS	Qambar	25/12/1966	GGPS	Shorshai
75	112	Rahmat Sultana	GGPS	F.A.Kanju	08/05/1958	GGPS	Toot Banai
76	113	Asmat Jehan	GGPS	Kala Kalay	25/11/1960	GGPS	Kala Kalay
77	114	Yasmin Hilal	GGPS	Saidu No 1	06/01/1962	GGPS	Fazal Baggharai
78	115	Jamila Begum	GGPS	Mingora	01/04/1962	GGPS	Sarkhazana
79	116	Roshan Ara	GGPS	Banr	08/07/1965	GGPS	Tangbanr
80	117	Gul Nasreen	GGPS	Wainai	01/01/1966	GGPS	Wainai
81	118	Bakht Mahal	GGPS	Fatehpur	03/03/1966	GGPS	Jarray
82	119	Zubaida Khatoon	GGPS	Baghderai	09/11/1967	GGPS	Baghderai
83	120	Imtiaz Begum	GGPS	M.G.Shahed	04/04/1968	GGPS	Tarokay
84	121	Zaibun Nisa	GGPS	Batiband	03/03/1969	GGPS	Batiband

Att. Ad

 Fazli Rakabi
 Advocate



85	123	Jehan begam	GGPS	Kuza Bandai	01/05/1961	GGPS	Koza Bandai
86	125	Tslim Kusar	GGPS	Malook Abad	19/06/1964	GGPS	Bakarai
87	126	Mehrun Nisa	GGPS	Haji Baba	13/04/1965	GGPS	Pirpatal
88	127	Tajbar Sultana	GGPS	Kanju	18/04/1965	GGPS	Sherpalam
89	131	Hassina Begum	GGPS	Monglor 2	04/03/1968	GGPS	Monglor 2
90	132	Nghat Begum	GGPS	Saidu No 1	02/02/1968	GGPS	Saidu No 1
91	133	Fatema	GGPS	Banr	13/04/1969	GGPS	Kund
92	135	Shah Izat	GGPS	Ahingaro Dherai	10/06/1967	GGPS	Ahingaro Dherai
93	136	Nighat	GGPS	Monglor 1	25/02/1968	GGPS	Monglor 1
94	137	Sher Bano	GGPS	Panr	20/04/1969	GGPS	Baligram
95	139	Riayat Begum	GGPS	F.A.Kanju	02/12/1968	GGPS	F.A Kanju
96	142	Zahiraz	GGPS	Mingora	12/04/1958	GGPS	Main Bila
97	143	Bibi Haleema	GGPS	Matta	15/09/1961	GGPS	Sambat Cham
98	145	Duri Tabinda	GGPS	Banr	01/04/1964	GGPS	Main Bila Dawa Khan
99	146	Dilshad	GGPS	Khatkalay	01/01/1965	GGPS	Khat kalay
100	147	Qudsia	GGPS	M.G.Shahed	01/01/1962	GGPS	Paindasha Patao
101	148	Bakhte Sultana	GGPS	Balogram,	21/04/1956	GGPS	Sardaray
102	152	Jehan Ara	GGPS	M.G.Shahed	15/03/1960	GGPS	Singar
103	155	Saeeda Bibi	GGPS	Jano	03/03/1962	GGPS	Jano
104	156	Roshan Ara	GGPS	Banr	01/04/1962	GGPS	Yakhtangai Bishbanr
105	157	Bibi Ayesha	GGPS	M.G.Shahed	20/12/1962	GGPS	Bowrai (KK)
106	158	Shamim Ara	GGPS	F.A.Kanju	30/10/1965	GGPS	Quanj
107	159	Najma	GGPS	Bandai K.K	01/04/1966	GGPS	Bandai K.Khela
108	160	Zeenat Mahal	GGPS	Khareray Cham	01/05/1960	GGPS	Deran Patai
109	161	Rabia Bibi	GGPS	Gul kada	01/04/1961	GGPS	Aqla
110	162	Saeeda Bibi	GGPS	Mingora	12/01/1963	GGPS	Kas Manai
111	164	Sorya Bano	GGPS	Panr	02/07/1963	GGPS	Kachakot
112	165	Sajida	GGPS	Kabal	19/10/1965	GGPS	Jawand
113	166	Shahi Begum	GGPS	M.G.Shahed	05/01/1966	GGPS	Bela Jano
114	167	Sima Akhtar	GGPS	Shagai	13/01/1966	GGPS	Tarkanai
115	169	Shah Izat	GGPS	Barikot	01/01/1967	GGPS	Shinkad
116	170	Hasanat	GGPS	Matta	02/02/1967	GGPS	Nazar Abad
117	172	Jamila Haleem	GGPS	Rahim Abad	07/11/1968	GGPS	Khwar Patai Seer

Attested




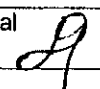
Fazli Rabbi
Advocate

9

12

118	179	Nasim Akhtar	GGPS	Totano Bandai	06/04/1965	GGPS	Totano bandai
119	180	Farhat Begum	GGPS	Haji Baba	08/01/1961	GGPS	Khir Abad
120	181	Israr Begum	GGPS	M.G.Shahed	18/09/1961	GGPS	Awari Chinkolai
121	183	Sultan Begum	GGPS	Banjot	10/01/1970	GGPS	Banjot
122	184	Zaitoon	GGPS	Seer	15/01/1970	GGPS	Seer
123	185	Samina Bibi	GGPS	Shagai	01/09/1970	GGPS	Jaloo
124	186	Abida Imtiaz	GGPS	Islampur	08/01/1967	GGPS	Karakar
125	187	Malyat	GGPS	Bala Baidara	01/02/1970	GGPS	Bala Baidara
126	189	Rukhsana Niaz	GGPS	Qambar	06/05/1969	GGPS	Jukhtai
127	190	Irfania Bibi	GGPS	Nawa Kalay	02/01/1970	GGPS	Kad Zaray
128	191	Bushra Begum	GGPS	Salanda	17/04/1971	GGPS	Salanda
129	192	Rawasia	GGPS	Mingora	12/06/1966	GGPS	Soorbanr
130	193	Nargis	GGPS	Damghar	10/11/1968	GGPS	Damghar
131	194	Razia Begum	GGPS	Afsar Abad	01/05/1970	GGPS	Zaray
132	196	Anwar Begum	GGPS	Qambar	10/08/1969	GGPS	Topsin
133	197	Saeeda Taj	GGPS	Manyar	08/05/1968	GGPS	Manyar
134	198	Hussa Nisa	GGPS	Dangram	28/04/1970	GGPS	Shaltaloo
135	199	Hassan Bono	GGPS	Aboha	05/01/1969	GGPS	Aboha
136	200	Rukhsana	GGPS	Chil Shagai	01/03/1969	GGPS	Ganajir
137	201	Mehrun Nisa	GGPS	Amankot	01/04/1970	GGPS	Sagar Gat
138	205	Rahmat Bibi	GGPS	Dehray Monglor	03/02/1968	GGPS	Talegram
139	207	Tahira Begum	GGPS	Gashkor	08/03/1967	GGPS	Gashkor
140	208	Yasmin begum	GGPS	Manyar	05/06/1969	GGPS	Zarakhela
141	209	Rashida	GGPS	Mingora	02/12/1970	GGPS	Gat Bela
142	211	Hamida Begum	GGPS	Chil Shagal	01/04/1958	GGPS	Ghurija Patai
143	212	Hamida Begum	GGPS	Sapal Bndai	04/10/1966	GGPS	Sapal Bndai
144	213	Rashida	GGPS	Fatehpur	03/04/1971	GGPS	chikrai
145	214	Iran Begum	GGPS	Batai	24/12/1958	GGPS	Batai k.K
146	215	Rehana Begum	GGPS	Ronyal	13/06/1961	GGPS	Ronyal
147	217	Zebon Nisa	GGPS	Shadara	12/06/1966	GGPS	Chalera
148	218	Bakht Sardara	GGPS	Batora	24/10/1954	GGPS	Balasoer
149	220	Bakht Saba	GGPS	Matta	15/04/1965	GGPS	Said Abad 2
150	221	Naheed Akhtar	GGPS	Chuprial	15/05/1967	GGPS	Chuprial


Attested

 Faizli Rakabi
 Advocate

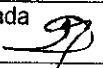


151	222	Zuhra Begum	GGPS	Benawrai	27/09/1967	GGPS	Benowrai
152	223	Nargas	GGPS	Kh: Khela	04/03/1968	GGPS	Khwarz Khela
153	225	Musart gul	GGPS	Gulbandai	10/04/1969	GGPS	Dagai Namai
154	226	Izzat Haram	GGPS	B.Bandai	01/01/1970	GGPS	Bara Bandai
155	227	Mehmudeya	GGPS	Kh: Khela	02/01/1970	GGPS	Tikdarai
156	228	RahamDiyar Bibi	GGPS	Kotanai	07/04/1970	GGPS	Kotanai
157	229	Shagufta	GGPS	Shagai	10/04/1971	GGPS	Rambikai
158	230	Jamila Ali	GGPS	Sijbanr	18/02/1966	GGPS	Sijbanr
159	232	Chand Bibi	GGPS	Kotanai	19/11/1967	GGPS	Shin
160	233	Zia Kalsoom	GGPS	Mingora	21/12/1966	GGPS	Tindodog
161	234	Nisar Begum	GGPS	Ahingaro Dherai	02/04/1970	GGPS	Dandanai 2
162	235	Shehnaz Begum	GGPS	Jambil	04/01/1962	GGPS	Jaba Kokarai
163	237	Nasrin Akhtar	GGPS	Haji Baba	08/06/1965	GGPS	Bahdar Banda Matta
164	238	Shadan Begum	GGPS	Galoch	12/04/1966	GGPS	Galoch
165	239	Shah Naz	GGPS	Mingora	10/01/1970	GGPS	Serai Gat
166	241	Nasrat Begum	GGPS	Sambat Kalay	18/03/1972	GGPS	Sambat Kalay
167	242	Shamim Ara	GGPS	Kalagram	01/02/1968	GGPS	Tirat
168	243	Seema Bibi	GGPS	Kokarai	16/06/1968	GGPS	Kokarai
169	244	Noor Jehan	GGPS	Naray Tangai	02/10/1968	GGPS	Naray Tangai
170	245	Nargas Begum	GGPS	Madyan	15/02/1969	GGPS	Shinko
171	246	Raffat Nasim	GGPS	Kanju	01/03/1969	GGPS	Kasai Milaga
172	248	Farzana Iqbal	GGPS	Galoch	01/05/1969	GGPS	Manja
173	250	Farhat Begum	GGPS	Koza Dureshkhela	27/06/1970	GGPS	Koza Durshkhela
174	251	Fatema	GGPS	Faiz Abad	13/10/1970	GGPS	Shagai Shwar
175	252	Bibi Aisha	GGPS	Sigram	02/01/1971	GGPS	Sigram
176	253	Nasim Akhtar	GGPS	Odigram 2	02/03/1971	GGPS	Rangila
177	256	Naseem Begum	GGPS	Baidara	01/04/1971	GGPS	Baidara
178	257	Hassina	GGPS	Jamal abad	01/04/1971	GGPS	Jamal abad
179	258	Norina	GGPS	Jambil	04/04/1971	GGPS	Jambil
180	259	Fatima Bibi	GGPS	Baidara	01/07/1971	GGPS	Sambat Mandoor
181	260	Rasheda	GGPS	Jamal abad	01/01/1972	GGPS	Doghlai
182	261	Izzat Begum	GGPS	Kala Kalay	01/01/1972	GGPS	Mahak
183	262	Nargas	GGPS	Kuza Bandai	07/03/1972	GGPS	Bahdar banda

T. 5-1-92
5-1-92

Accepted


Fazl Rabbi
Advocate



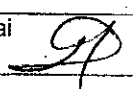
(14)

184	264	Shahida Begum	GGPS	Banr	04/02/1969	GGPS	Khalkarai
185	265	Balanisht Zeb	GGPS	Koza Asala	10/05/1972	GGPS	K.Asala
186	266	Shagufta Bibi	GGPS	Kotanai	25/04/1972	GGPS	Chmtalai
187	269	Dunya Zada	GGPS	Saidu No 1	06/10/1959	GGPS	Gidar Sar
188	271	Hussna Bibi	GGPS	Afsar Abad	20/08/1963	GGPS	Kharaway Doghalgai
189	273	Fareeda Ahmad	GGPS	Kabal	01/04/1968	GGPS	Khemdara
190	274	Subhania	GGPS	Jehan Abad Moglor	01/01/1969	GGPS	Jehan Abad Moglor
191	275	Parveen Akhtar	GGPS	F.A.Kanju	15/04/1970	GGPS	Yakhtangai Melaga
192	276	Akhtar Begum	GGPS	Rahim Abad	10/06/1970	GGPS	Spirdar Baba
193	277	Afsar Sultana	GGPS	Gwaleral	25/03/1971	GGPS	Gwaleral
194	278	Aqalmeena	GGPS	Kalay Miandam	10/03/1972	GGPS	Gojaro Kalay miandam
195	279	Hussan Bano	GGPS	Saidu No 1	03/04/1969	GGPS	baboo
196	280	Sharafat	GGPS	Mingora	01/02/1972	GGPS	Daromaira
197	281	Noor Jehan	GGPS	Rahim Abad	14/01/1954	GGPS	Walar Mandal
198	282	Shahi Merman	GGPS	Pashtonai	10/03/1954	GGPS	Pashtonai
199	283	Shagufta	GGPS	Gulibagh	01/02/1964	GGPS	Alamganj
200	284	Musarat Wahab	GGPS	Madyan	18/02/1964	GGPS	Drab
201	286	Guli Rana	GGPS	Matta	15/04/1964	GGPS	Main Kalay
202	287	Zahida Begum	GGPS	Saidu No 1	15/09/1964	GGPS	Swatai
203	288	Yasmeen Begum	GGPS	Amankot	01/01/1965	GGPS	Kasoona Maindam
204	289	Nasrin Begum	GGPS	Patanai	18/01/1966	GGPS	Patanai
205	290	Yasmeen Akhtar	GGPS	Shagai	12/02/1966	GGPS	Tarogai
206	293	Ishrat Rashid	GGPS	Kota	05/05/1967	GGPS	Churkhai
207	294	Jehan Parveen	GGPS	Kandawgai	01/04/1968	GGPS	Kandawgai
208	295	Hajira Bibi	GGPS	Gwaleral	11/04/1968	GGPS	Lilbanr
209	296	Nighat Sima	GGPS	Shagai	13/08/1968	GGPS	Bazkhela
210	297	Noor Jehan	GGPS	Kalagram	13/03/1969	GGPS	Kalagram
211	298	Bibi Rabia	GGPS	Saidu No 2	23/05/1969	GGPS	Urdam
212	299	Yasmin	GGPS	Nawa Kalay	12/02/1972	GGPS	Sokarkata
213	300	Abida	GGPS	Mingora	14/04/1972	GGPS	Sotanr
214	301	Bakht Wisala	GGPS	Shana Krapa	02/01/1972	GGPS	Gall
215	302	Shagufta	GGPS	Ningolai	18/04/1972	GGPS	Naranjpura
216	303	Tasleem Akhtar	GGPS	Kanju	17/07/1972	GGPS	Ningolai

Attested




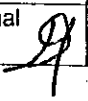
Fazli Rabia
Advocate



15

217	304	Jameela	GGPS	Beha	07/07/1966	GGPS	Beha
218	305	Sha Izat	GGPS	Shadara	12/08/1969	GGPS	Serai Barhampatal
219	306	Zeenat Bibi	GGPS	Kala Kalay	15/04/1970	GGPS	Taghma
220	307	Parveen Akhtar	GGPS	Kabal	15/04/1970	GGPS	Swegalai
221	308	Akhtar Bibi	GGPS	Wadana Goratai	09/03/1972	GGPS	Wadana Goratai
222	309	Nasreen Begum	GGPS	Shin Patay	03/04/1967	GGPS	Shin Patai
223	310	Dilshad bagam	GGPS	Kuza Bandai	04/04/1970	GGPS	Kimyaray
224	311	Rashida Bibi	GGPS	Bara Samai	01/11/1971	GGPS	Barasamai
225	312	Shahab Majeed	GGPS	Ghalegay	02/02/1969	GGPS	Amlookdara
226	313	Haleema	GGPS	Kh: Khela	05/02/1970	GGPS	Babo Maira
227	314	Shamim Akhtar	GGPS	Saidu No 1	14/06/1959	GGPS	Jehan Abad Darmai
228	315	Hamida Begum	GGPS	Monglor. 1	01/03/1961	GGPS	Tootkay
229	318	Yasmin Begum	GGPS	Odigram 1	05/01/1960	GGPS	Odigram 1
230	319	Shukat Ara	GGPS	Banr	07/01/1960	GGPS	Marano Mashkomai
231	320	Anjuman Ara	GGPS	Amankot	04/05/1961	GGPS	Mangra
232	321	Jehan Begum	GGPS	Shakar Dara	02/08/1963	GGPS	Shakar Dara
233	324	Amatullah	GGPS	Charbagh 1	12/02/1965	GGPS	Charbagh 1
234	325	Bibi Khatoon	GGPS	Gul kada	09/05/1965	GGPS	Matta pia Khwar
235	326	Ayesha Begum	GGPS	Loy Namal	01/02/1966	GGPS	Loy Namal
236	327	Zeenat Begum	GGPS	Gul kada	06/02/1966	GGPS	Kharkay Sakhra
237	328	Jehan Sardara	GGPS	Kota	01/04/1966	GGPS	Sakhachina
238	329	Zeenat	GGPS	Islampur	01/04/1966	GGPS	Baro Darmai
239	330	Nasim Begum	GGPS	M.G.Shahed	05/05/1966	GGPS	Dab
240	331	Zeenat Begum	GGPS	Ghalegay	01/04/1967	GGPS	Baowrai(Ghalegay)
241	332	Shagufta Bibi	GGPS	Wainai	03/05/1967	GGPS	Saland
242	334	Mumtaz Begum	GGPS	Mian Maira	10/09/1968	GGPS	Mian Maira
243	336	Jehan Begum	GGPS	Chil Shagai.	01/05/1969	GGPS	Dandai Chamtalai
244	337	Zeb Jehan	GGPS	Gul kada	01/06/1969	GGPS	Danal Shalpin
245	338	Saima Gul	GGPS	Sherara	02/01/1970	GGPS	Sherara
246	339	Jamila Begum	GGPS	Khwajaabad	04/04/1970	GGPS	Khwajaabad
247	340	Zahida	GGPS	Sangota	20/05/1970	GGPS	Darmai
248	341	Razia Begum	GGPS	Sakhra	10/05/1971	GGPS	Sakhra
249	342	Taslem Kosar	GGPS	Nawa Kalay	16/05/1972	GGPS	Warokai Namal

Att: d

Fazli Rababi
Advocate



(16)

250	344	Noor Jehan	GGPS	Saidu No 1	08/05/1971	GGPS	Dehray Jarray
251	346	Bakhti Raja	GGPS	Amankot	06/06/1966	GGPS	Dushagram
252	348	Bacha Afsar	GGPS	Aghal	15/12/1964	GGPS	Aghal
253	349	Zubida	GGPS	Matta	16/05/1968	GGPS	Kowar Oba
254	350	Bibi Ayesha	GGPS	Lik patai	15/02/1969	GGPS	Lik patai
255	351	Tasleem Rehman	GGPS	Afsar Abad	20/04/1969	GGPS	Mairamai
256	352	Zahira	GGPS	Faiz Abad	02/05/1969	GGPS	Naraay dilay Paindai
257	353	Shamim	GGPS	Sijban	02/01/1970	GGPS	Nilagram
258	354	Raham Taj	GGPS	Labat	30/05/1970	GGPS	Labat
259	356	Bacha Naseeba	GGPS	Beha	22/02/1971	GGPS	Charai Beha
260	357	Rabia Basri	GGPS	Nawa Kalay	10/04/1971	GGPS	Qadim Mankyal
261	358	Yasmeen	GGPS	Dagai	15/04/1972	GGPS	Dagai
262	359	Shama Bibi	GGPS	Shin Patay	01/05/1972	GGPS	Mashigai
263	360	Parveen Begum	GGPS	Kanju	04/06/1972	GGPS	Aligrama
264	361	Rifat Parveen	GGPS	Haji Baba	17/01/1955	GGPS	Sharip Abad Shalpin
265	363	Jameela	GGPS	Deolai	10/04/1957	GGPS	Deolai
266	364	Bakht Zeba	GGPS	Kolam	13/02/1958	GGPS	Kolam
267	367	Jehan Pari	GGPS	Sambat Kalay	01/05/1962	GGPS	Dandanai 1
268	369	Nizakat	GGPS	M.G.Shahed	02/10/1962	GGPS	Lalko
269	370	Hasanat	GGPS	Damghar	01/03/1965	GGPS	Langar Faqiran
270	371	Basmin Azra	GGPS	Shadara	01/04/1965	GGPS	Badai mankyal
271	372	Norul Haram	GGPS	Shadara	01/04/1965	GGPS	Oghaz Kass
272	374	Rukhsaba Akb	GGPS	Saidu No 1	20/04/1966	GGPS	Sabzal
273	376	Riffat Altaf	GGPS	Shana Krapa	01/04/1967	GGPS	Qasim Nasafai
274	377	Ulfat Begum	GGPS	Saidu No 1	11/04/1967	GGPS	Qayuoom Abad
275	378	Islamia Bibi	GGPS	Labat	05/12/1967	GGPS	Awisha Chuprial
276	380	Taslim Begum	GGPS	Monglor 1	04/02/1968	GGPS	Shaldara
277	381	Wadana	GGPS	Pashtonai	31/05/1968	GGPS	Manai Pashtonai
278	382	Subhania	GGPS	Ahingaro Dherai	05/04/1969	GGPS	Charai Lalkoo
279	383	Nizakat	GGPS	Monglor 1	07/04/1969	GGPS	Dewanbat
280	384	Rifat jehan	GGPS	Barawal Awarai	01/06/1969	GGPS	Barawal Awarai
281	385	Rafia Begum	GGPS	Amankot	05/06/1969	GGPS	Barshagram
282	366	Nargaj	GGPS	Kala Kalay	20/04/1970	GGPS	Nasrat

Attsted



Fazli Rabbani
Advocate

29

283	387	Talhayat	GGPS	Sakhira	14/03/1969	GGPS	Ragistoon
284	388	Zamarrud	GGPS	Deolai	16/11/1966	GGPS	Deolai 2
285	389	Saima Bashir	GGPS	M.G.Shahed	07/04/1967	GGPS	Kharaway Monglor
286	390	NoorAziza	GGPS	Kh: Khela	01/04/1968	GGPS	Landai Maira
287	392	Farida	GGPS	Odigram 1	12/12/1967	GGPS	bashigram
288	393	Almas	GGPS	Ahingaro Dherai	01/05/1969	GGPS	Aryanai
289	394	Shamim Akhtar	GGPS	Banr	03/03/1970	GGPS	Awisha Lagan
290	395	Jehan Begum	GGPS	Rahim Abad Sambat	15/10/1970	GGPS	Rahim Abad Sambat
291	398	Farhat Begum	GGPS	Gurra	22/05/1972	GGPS	Gurra
292	399	Shameem Akhtar	GGPS	Barthana No.2	10/06/1972	GGPS	Barthana No.2
293	400	Hameeda Bibi	GGPS	Kanju	01/07/1972	GGPS	Srajai
294	401	Javeda Begum	GGPS	Bodigram	01/02/1973	GGPS	Bodigram
295	402	Kusar Parveen	GGPS	Barikot	01/03/1973	GGPS	Parrai
296	403	Sartaj Begum	GGPS	B.Bandai	01/04/1973	GGPS	Shalhand
297	404	Fazelat	GGPS	Kanju	01/04/1973	GGPS	Asharai Kabal
298	405	Nasim Akhtar	GGPS	Kabal	15/04/1973	GGPS	Goda Manal
299	405	Sadia Said	GGPS	Matta	01/07/1973	GGPS	Aghuz Patai
300	406	Zeenat Begum	GGPS	F.A..Deolai	28/08/1973	GGPS	F.A.Deolai
301	407	Noorin Akhtar	GGPS	Haji Baba	01/01/1974	GGPS	Ayeen
302	408	Saeeda	GGPS	Ala Abad	12/03/1974	GGPS	Ala Abad
303	409	Parveen Begum	GGPS	Kharerai Kalay	04/04/1974	GGPS	Kharerai Kalay
304	410	Subhania Bibi	GGPS	Mandal No.1	13/04/1974	GGPS	Mandal No.1
305	411	Shaheen Begum	GGPS	Koza Dureshkhela	24/06/1976	GGPS	Spina Khpa
306	412	Mehrun Nisa	GGPS	Maloch	12/09/1970	GGPS	Maloch
307	413	Zeenat Bibi	GGPS	Asharay K.Kh	01/03/1974	GGPS	Talai Kalakot
308	414	Bibi Asia	GGPS	Serai Roringar	02/05/1974	GGPS	Serai Roringar
309	415	Akhtar bibi	GGPS	Kuza Bandai	01/01/1972	GGPS	Kamkholai
310	416	Parveen Akhtar	GGPS	M.G.Shaheed	01/04/1971	GGPS	Balagarrai
311	417	Jehan Bano	GGPS	Haji Baba	04/07/1972	GGPS	Karal
312	418	Khadija Bibi	GGPS	Barthana No.2	05/07/1970	GGPS	Jurbandai
313	419	Neelam	GGPS	Saidu No 2	04/04/1972	GGPS	Baranway
314	420	Shahi Zeenat	GGPS	Shah Dherai	05/04/1973	GGPS	Sar Kandow
315	421	Tahira Begum	GGPS	Odigram 1	20/05/1973	GGPS	Dedawar

Fazli Roshni Advocate

29

18

316	422	Taslim Akhtar	GGPS	Charbagh 2	07/01/1968	GGPS	Titaywala
317	423	Zeenat	GGPS	Qambar	13/04/1972	GGPS	Balakot
318	424	Hashmat Bibi	GGPS	Barikot	12/11/1972	GGPS	Nagotha
319	426	Noor Ala	GGPS	Bar Shawar	09/09/1972	GGPS	Bar Shawar
320	428	Taj Mahal	GGPS	Sersinal	01/01/1971	GGPS	Serdinai
321	430	Salma Begum	GGPS	Chil Shagai	15/03/1970	GGPS	Bela Charai
322	431	Gui Khandana	GGPS	Sijban	01/04/1970	GGPS	Arkot
323	432	Bacha Hurmat Bibi	GGPS	Panr	03/02/1973	GGPS	Oghaz Kokarai
324	433	Maryam	GGPS	Amankot	10/08/1972	GGPS	Bela Gabral
325	435	Iqbal Begum	GGPS	Amankot	04/05/1957	GGPS	Belkidam
326	436	Shaheena	GGPS	Dero Kabal	11/11/1960	GGPS	Dehro kabal
327	437	Nizakat	GGPS	Qambar	01/04/1962	GGPS	Ber Bahrin
328	438	Mastoria	GGPS	F.A.Kanju	20/05/1962	GGPS	Pacha kalay
329	439	Munawar Sultana	GGPS	Kanju	09/06/1963	GGPS	Taran
330	440	Razia Bibi	GGPS	Dakorak	08/06/1964	GGPS	Dakorak
331	441	Farzana Naheed	GGPS	Gul kada	12/04/1967	GGPS	Cham Garrai
332	442	Khaista Bano	GGPS	Galoch	01/04/1968	GGPS	Ghakhhi banda
333	443	Izat Begum	GGPS	Behrain	01/01/1969	GGPS	Bahrin
334	444	Tahira anwar	GGPS	Amankot	01/02/1969	GGPS	Chirat
335	445	Bacha Hayat	GGPS	Shokhdara	01/04/1969	GGPS	Shokhdara
336	446	Rahat Begum	GGPS	Nawa Kalay	03/05/1969	GGPS	Dabargai
337	448	Naheed Akhtar	GGPS	Afsar Abad	01/01/1970	GGPS	Darmar Shagram
338	451	Nargas Akhtar	GGPS	Bala Baidara	03/10/1970	GGPS	Manal Gawaleray
339	452	Shaheen	GGPS	Mingora	22/12/1970	GGPS	Darolai
340	453	Rabiat	GGPS	Akhun kalay	01/01/1971	GGPS	Akhun kalay
341	454	Nasim "Akhtar	GGPS	Kolakarin	10/01/1971	GGPS	Kolakarin
342	455	Deedar Begum	GGPS	Qambar	01/04/1971	GGPS	Dehray Bahrin
343	456	Shahi Begum	GGPS	Wadana Goratai	01/06/1971	GGPS	Warana Goratai
344	457	Shehnaz Begum	GGPS	Balogram	01/06/1971	GGPS	Gahil Kalam
345	459	Bakht Besyar	GGPS	Shadara	01/04/1968	GGPS	Gurnai
346	462	Eidul Azha	GGPS	Badalai	05/04/1970	GGPS	Badalai
347	464	Maryam	GGPS	Dagai	11/06/1970	GGPS	Zawra
348	465	Robina Begum	GGPS	Rahim Abad	01/04/1971	GGPS	Gujaro Gabral

Handwritten signature

Handwritten signature

*Razli Farazi
Advocate*

Handwritten mark

349	466	Nargis Ara	GGPS	Kabal	07/04/1971	GGPS	Kotlai
350	467	Tasim Bibi	GGPS	Salanda	14/02/1972	GGPS	Malam
351	468	Shakila Bostan	GGPS	Shaheen Abad	12/04/1971	GGPS	Jail Bahrin
352	469	Robina Shaheen	GGPS	Mingora	01/04/1966	GGPS	Gall Shah Bahrin
353	471	Baghi Chaman	GGPS	Miandam	02/02/1955	GGPS	Maindam
354	472	Razia Sultana	GGPS	Marghuzar	15/03/1955	GGPS	Marghuzar
355	474	Nasim Akhtar	GGPS	Saidu No 1	12/06/1959	GGPS	Jalbanr
356	475	Aisha	GGPS	Haji Baba	13/12/1962	GGPS	Kalagai
357	476	Nigat Yasmin	GGPS	Malook Abad	05/04/1963	GGPS	Guratai
358	477	Bakht Chamand	GGPS	Kabal	03/02/1965	GGPS	Asogai
359	478	Wala Himat	GGPS	Qambar	01/05/1965	GGPS	Kalam 1
360	480	Hassina Bibi	GGPS	Charbagh 2	10/01/1966	GGPS	Kot
361	481	Halima	GGPS	Manyar	15/04/1966	GGPS	Kohay
362	482	Noor Bacha	GGPS	Kala Kalay	01/11/1967	GGPS	Bikor
363	483	Naheed Begum	GGPS	Koza Dureshkhela	03/01/1969	GGPS	Galsha k k
364	484	JehanWala	GGPS	Bahram Patai	16/07/1969	GGPS	Barham Patai
365	485	Alia	GGPS	Sakhra	01/06/1970	GGPS	Hussan Abad Darmai
366	488	Bakht Razia	GGPS	Pia	31/10/1960	GGPS	Pia
367	489	Musarat Jehan	GGPS	Bamkhela	15/05/1963	GGPS	Bamkhela
368	491	Haroon Nisa	GGPS	Sambat Kalay	04/02/1964	GGPS	Samai Roringar
369	492	Parveen	GGPS	Gharshin	19/11/1964	GGPS	Gharshin
370	493	Farhat Begum	GGPS	Kokrai	01/07/1967	GGPS	Kokrai
371	494	Tahira begum	GGPS	Banr	06/04/1969	GGPS	Kanga Bahrin
372	495	Bakht Afsar	GGPS	Sigram	01/06/1969	GGPS	Ialo Banda
373	496	Farzana	GGPS	Rahim Abad	15/08/1969	GGPS	Kas Bashigram
374	497	Sajida Bibi	GGPS	Khareray Cham	06/01/1970	GGPS	Kabal Koo
375	498	Shamim Ara	GGPS	Dherai Labat	17/02/1970	GGPS	Dherai Labat
376	499	Amena Bibi	GGPS	Garai Chuprial	10/03/1970	GGPS	Garai Chuprial
377	500	Dilshad	GGPS	Islampur	15/04/1970	GGPS	Kass Kalam 1.
378	501	Sher Bano	GGPS	Odigram-2	18/04/1970	GGPS	Kass Kalam 2
379	504	Nusrat	GGPS	Gogdara	10/02/1968	GGPS	Gogdara
380	505	Yasmin Ghafoor	GGPS	Shadara	13/01/1960	GGPS	Shadara
381	506	Chand Bibi	GGPS	Gulibagh	01/01/1968	GGPS	Rorya

Musarat

Fazli Rababi
Advocate

ep

20

382	507	Farhat Begum	GGPS	Said Abad	01/04/1970	GGPS	Said Abad 1
383	509	Sahamim Akhtar	GGPS	Aboha	07/06/1972	GGPS	Kalam 2
384	510	Ghazal Yasmin	GGPS	Monglor 2	05/10/1972	GGPS	Shingrai
385	512	Nasrin Akhtar	GGPS	Odigram 1	26/11/1972	GGPS	Kass Sazgal
386	513	Maryam	GGPS	Charbagh 1	01/01/1973	GGPS	Kotmaira
387	515	Mujahida	GGPS	Gul Dherai	03/05/1973	GGPS	Guldehray
388	516	Hussan Bibi	GGPS	Nawa Kalay	08/05/1973	GGPS	Khwar Shagram
389	517	Farida Begum	GGPS	Shaheen Abad	05/06/1973	GGPS	Kidam
390	519	Zohra Begum	GGPS	Charbagh 2	02/03/1972	GGPS	Barkalay Bishbanr
391	520	Bano Bibi	GGPS	Kalkata	24/03/1972	GGPS	Kalkata
392	521	Bibi Salima	GGPS	Rashagata	01/06/1972	GGPS	Rashagata
393	522	Mehnaz	GGPS	Monglor 2	13/02/1973	GGPS	Bishbanr
394	523	Shaheen Begum	GGPS	ShanaKrapa	10/08/1973	GGPS	Koz Tangon
395	524	Gul Shawar	GGPS	Monglor 1	03/02/1974	GGPS	Araq
396	525	Shamim Bibi	GGPS	Kwaray	03/12/1970	GGPS	Kwaray
397	526	Fazilat Atiq	GGPS	Malook Abad	12/05/1972	GGPS	Kowro Shagram
398	528	Nuzhat	GGPS	Malook Abad	07/05/1969	GGPS	Lambat
399	529	Zohra Begum	GGPS	Paklai Shagram	15/02/1971	GGPS	Paklai Shagram
400	530	Husina Bibi	GGPS	Bara Dureshkhela	30/05/1974	GGPS	Bara Durshkhela
401	531	Tasleem Begum	GGPS	Mandal 2	01/02/1972	GGPS	Mandal 2
402	533	Parveen Akhtar	GGPS	Mingora	13/04/1971	GGPS	Loi Satal
403	534	Nasim Akhtar	GGPS	Haji Baba	08/03/1967	GGPS	Koz Shawar
404	536	Nasib Rana	GGPS	Afsar Abad	01/02/1972	GGPS	mankar
405	537	Bibi Zarina	GGPS	Bara Dureshkhela	20/02/1973	GGPS	Asharai K.K
406	538	Irfat Shaheen	GGPS	Balogram	01/10/1969	GGPS	mankyal
407	539	Bibi Fatehma	GGPS	Saidu No.2	12/04/1970	GGPS	Matiltan
408	542	Zubaida	GGPS	Bandai K.K	03/05/1973	GGPS	Giretal
409	543	Dilshad Taj	GGPS	Shana Krapa	10/05/1973	GGPS	Morpandai
410	544	Wala Himat	GGPS	Mingora	16/06/1968	GGPS	Najvi Garrai
411	547	Jamila Begum	GGPS	Shadara	06/10/1970	GGPS	Punkya
412	549	Yasmin	GGPS	Haji Baba	04/05/1972	GGPS	Chill Kokarai
413	551	Nasim Begum	GGPS	Charbagh 2	18/04/1973	GGPS	Mangoltan
414	551	Razia Begum	GGPS	Rahim Abad	25/04/1971	GGPS	Qibla Bahrin

Handwritten signature

Handwritten signature

Fazli Rabbat
Advocate

Handwritten signature

21

415	552	Salma Khan	GGPS	Gogdara	01/01/1973	GGPS	Ramit
416	554	Bibi Amna	GGPS	Beha	20/05/1963	GGPS	Fazal Banda
417	555	Maryam Bibi	GGPS	Gogdara	06/10/1965	GGPS	Saleh Abad Utror
418	556	Nusrat Sharif	GGPS	Tall	28/01/1966	GGPS	Tall
419	557	Shagufta	GGPS	Panr	18/01/1967	GGPS	Aghuz Kalay
420	558	Shagufta	GGPS	Kwaro Tangai	05/04/1967	GGPS	Kwaro Tangai
421	559	Rashida Begum	GGPS	Panr	02/01/1968	GGPS	Birarai
422	560	Bibi Raham Jalila	GGPS	Kh: Khela	01/02/1968	GGPS	Shalpin
423	561	Rahmat Begum	GGPS	Galoch	03/02/1968	GGPS	Tighak
424	563	Jehan Ara	GGPS	Qambar	01/04/1968	GGPS	Sarbanda
425	564	Zenet Begum	GGPS	Barikot	15/07/1968	GGPS	Durmashai
426	565	Anwar Begum	GGPS	M.G.Shahed	11/11/1968	GGPS	Shagai Bahrin
427	566	Azra Begum	GGPS	Totano Bandai	12/07/1969	GGPS	Goldan
428	567	Riaz Begum	GGPS	B.Bandai	01/08/1969	GGPS	Churpinorai
429	568	Yasmin Begum	GGPS	Batora	12/08/1970	GGPS	Shahi Bagh
430	569	Razia Begum	GGPS	Charmar Serai	10/01/1971	GGPS	Charmar Serai
431	570	Najma Naeem	GGPS	Amankot	17/07/1971	GGPS	Shaho Kalam
432	572	Parveen Akhtar	GGPS	Jat Kkot.	10/04/1971	GGPS	Jatkot
433	573	Fatima	GGPS	Charbagh 1	01/04/1972	GGPS	Zangai
434	574	Noor Jihan	GGPS	Saidu No 2	01/05/1972	GGPS	Tanga
435	575	Sofia Bibi	GGPS	Kanju	04/04/1974	GGPS	Nimakai
436	576	Shaheen Begum	GGPS	Khareray Cham	03/01/1975	GGPS	Bulkarai
437	577	Razia Bibi	GGPS	Tangotal	15/01/1975	GGPS	Tangotal
438	578	Nighat	GGPS	Manyar	15/01/1974	GGPS	Khazana
439	579	Taslim Begum	GGPS	Saidu No 2	01/04/1969	GGPS	Usho
440	580	Chand Bibi	GGPS	Islampur	05/12/1969	GGPS	Usho Kass
441	581	Hasina Gul	GGPS	Shadara	30/03/1970	GGPS	Zoor Chail
442	582	Talat Begum	GGPS	Patanai	01/04/1970	GGPS	Utror
443	583	Zakia Bibi	GGPS	Afsar Abad	09/05/1970	GGPS	Zoor Kalay Bahrin
444	584	Farida	GGPS	Gul kada	01/01/1972	GGPS	Bayoon Kalam
445	585	Zhura Begum	GGPS	Manyar	22/11/1972	GGPS	Gamkot
446	586	Fazilat	GGPS	Shakhorai	01/01/1973	GGPS	Shakhorai
447	587	Razia Gul	GGPS	Charbagh 2	15/01/1973	GGPS	Shabuddin Maira

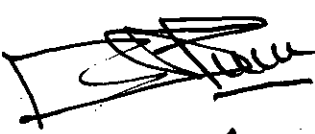
AHES

Fazli Rabbani
Advocate

22

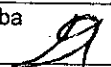
448	588	Sharafat	GGPS	Marjanai	19/01/1973	GGPS	Marjanai
449	589	Shagufta Naz	GGPS	Haji Baba	06/02/1973	GGPS	Garrai
450	590	Shagufta Habib	GGPS	Kabal	01/04/1973	GGPS	Dadahara
451	591	Gul Bibi	GGPS	Panjigram	07/04/1973	GGPS	Panjigram
452	592	Ashraf Begum	GGPS	Kalkata	12/04/1973	GGPS	Chail Maira
453	593	Alia Bibi	GGPS	Nawakalay Fatehpur	20/06/1973	GGPS	Naway Kalay Fatehpur
454	594	Nargis Ishaq	GGPS	Mashkomai	01/09/1973	GGPS	Mashkomai
455	595	Shamim Akhtar	GGPS	Amankot	03/10/1973	GGPS	Janimar
456	596	Behtarin Bibi	GGPS	Kass Qandil	05/01/1974	GGPS	Kass Qandil
457	597	Rahmat Nisa	GGPS	Pashtonai	01/02/1974	GGPS	Dada Fazil Banda
458	598	Roobi	GGPS	Gul Dherai	02/02/1974	GGPS	Behar
459	599	Saeeda Begum	GGPS	Beha	05/02/1974	GGPS	Charaipandarkot
460	600	Asmat Nazir	GGPS	Nalkot	12/02/1974	GGPS	Nalkot
461	601	Farida	GGPS	Khamba	11/03/1974	GGPS	Khamba
462	602	Nabeela Rahman	GGPS	Sersinai	01/04/1974	GGPS	Haji Patai
463	603	Rojia Begum	GGPS	Badalai	03/04/1974	GGPS	Chail
464	604	Nusrat Begum	GGPS	Gulibagh	01/05/1974	GGPS	Toha
465	605	Tasleem Begum	GGPS	Chalyar	01/05/1974	GGPS	Chalyar
466	606	Rifat	GGPS	Balogram,	05/05/1974	GGPS	Sar
467	607	Farzana	GGPS	Dagai	16/08/1974	GGPS	Gadi
468	608	Rahat Sultana	GGPS	Bar Shawar	18/10/1974	GGPS	lahori Gat
469	609	Asma	GGPS	Mingora	04/12/1974	GGPS	Jawaz
470	611	Asmat	GGPS	F.A.Kanju	04/04/1975	GGPS	Chur Qazi Abad
471	612	Naheed Bibi	GGPS	Kotanai	15/04/1975	GGPS	Manpitai
472	613	Zohra Bibi	GGPS	Nalkot	22/04/1975	GGPS	Bahraman Patai
473	614	Naheed Akhtar	GGPS	Barthana No.1	01/05/1975	GGPS	Barthana No.1
474	616	Zamzuma	GGPS	Kh:Khela	20/05/1974	GGPS	Chinkolai
475	617	Mujahida bibi	GGPS	Qandil	20/02/1975	GGPS	Qandil
476	618	Salma Jalil	GGPS	Batai	15/02/1975	GGPS	Paladram
477	619	Rahat Begum	GGPS	Banr	07/03/1966	GGPS	Bar Qala
478	621	Khurshaid Begum	GGPS	Ditpanai	13/04/1967	GGPS	Ditpanai
479	622	Azra Niaz Gul	GGPS	Mingora	15/04/1968	GGPS	Babo Maira
480	623	Nishat Parveen	GGPS	Banr	02/02/1970	GGPS	Naray Oba

Attested



Fazi Akbar
Advocate

D



23

481	624	Parveen Akhtar	GGPS	Ronyal	17/07/1971	GGPS	Alagram
482	625	Farzana	GGPS	Pashtonai	05/02/1972	GGPS	Doghalgai
483	626	Naeed	GGPS	Kokarai	12/04/1975	GGPS	Ganorai
484	627	Nihayat Begum	GGPS	M.G.Shahed	10/02/1975	GGPS	Jarray Chinkolai
485	628	Maryam	GGPS	Sangota	19/04/1975	GGPS	Asorai Chamtalai
486	629	Yasmin	GGPS	M.G.Shahed	02/05/1963	GGPS	Jishar kk
487	216	Zeenat Begum	GGPS	Qambar	03-05-1962	GGPS	Qambo

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 regulation as may be issued from time to time by the Govt.:
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she 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 No TA/DA is allowed for joining her duty.
- 7 They will give an under taking to be recorded in their service Book to the effect that if any over payment is made to her in light this order will be recovered and if she is wrongly promoted she will be reversed.

Attested



Fazal Rababi
(Lawyer)
Advocate
for petitioner

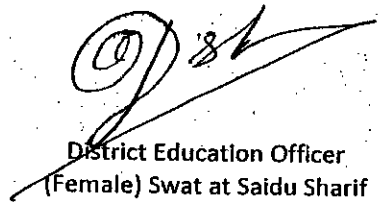
Endst No 569-74 / Upgradation file / PST

(DILSHAD BEGUM)
District Education Officer
(Female) Swat at Saidu Sharif

Dated 27 / 02 / 2013

Copy forwarded for information and necessary action to the:-

- 1 P/S to the Honourable Secretary Government Khyber Pakhtunkhwa E&SE Department Peshawar.
- 2 Director E&SE Khyber pakhtunkhwa Peshawar.
- 3 District Accounts Officer Swat.
- 4 Sub Divil: Education Officer (F) Swat.
- 5 All Official Concerned.
- 6 Superintendent local Office.


District Education Officer
(Female) Swat at Saidu Sharif

محترمہ!

محکمہ تعلیم سکولز زنانہ ضلع سوات نے تمام اصول و ضوابط برائے ترقی و تبادلہ کو نظر انداز کرتے ہوئے میرے ساتھ بے انصافی کی ہے۔ جس کے اذالے اور انصاف کے حصول کیلئے میں اب برائے راست آپ کی خدمت میں درخواست گزار ہوں۔ مجھے امید ہے کہ آپ بحیثیت ہمارے آفیسر کے مجھے انصاف فراہم فرمادیں گی۔ اور مجھے عدالت میں جانے سے بچا دیں گی۔ جیسا کہ آپ کو معلوم ہے کہ محکمہ تعلیم (سکولز) میں ترقی اور تبادلہ کے لئے پالیسی منحصر ہے۔

(1) ایک IPST ستانی تعیناتی اور اس کی اپنی یونین کونسل میں ہوگی۔

(2) سینارٹی لسٹ ٹریننگ کی بنیاد پر بنتا ہے۔ اور اگلے تمام فیصلے اسی بنیاد پر ہوتے ہیں۔

مذکورہ بالا پالیسی کی موجودگی کے باوجود میرے ساتھ ظلم اور نا انصافی ہوئی ہے۔ کیونکہ

(1) میں ملوک آباد، منگورہ کا جدی اور پشتی رہائشی باشندہ ہوں۔ میرے والد صاحب خود ایک ریٹائرڈ سرکاری ملازم ہے۔ میں بذات خود غیر شادی شدہ ہوں۔ نہ خود کھیتی

دور افتادہ علاقے میں رہ سکتی ہوں۔ اور نہ میرے والد صاحب کی صحت اور عمر ایسی ہے کہ وہ میرے ساتھ رہ سکیں۔ روزانہ سفر کرنا نہ صرف مالی طور پر ممکن ہے اور نہ جسمانی طور پر۔

(2) مجھے گورنمنٹ گرلز پرنمری سکول منگورہ سے بوجہ میری ترقی (سکیل نمبر 15) کو گورنمنٹ گرلز پرنمری سکول سوتو کیا گیا ہے۔

(3) آپ کی توجہ آپ کی دفتر سے جاری کردہ ترقیوں اور تبادلوں کی حکم نامہ نمبر NO569-74/Upgradation/PST مورخہ 27-02-2013 کی طرف

مبذول کرنا چاہتی ہوں۔

(4) اس حکم نامے کی سیرکل نمبر 160 پر جو خاتون ٹیچر مذکورہ ہے۔ اس کا تاریخ تربیت 5 جنوری 1995ء ہے۔ یعنی مجھ سے تقریباً چار یا پانچ سال بعد ہے۔ کیونکہ میں نے

ٹریننگ 1989-90ء میں کی تھی۔ پالیسی کی مطابق مجھے اس محترمہ سے سینئر پوزیشن چاہیے تھا۔ لیکن نامعلوم وجوہات کی بناء پر اس کی سینیارٹی نمبر 233 جبکہ مجھے 300 نمبر

پر رکھا گیا ہے۔ یہ اقدام بدینتی اور بے انصافی پر مبنی ہے۔

(5) غالباً اس بدینتی اور نا انصافی کو بنیاد بنا کر اس محترمہ کو میرے ہی سکول سے گورنمنٹ گرلز پرنمری سکول تیندو ڈاگ کو تبدیل کیا گیا۔ حالانکہ یہ میرا حق تھا۔

(6) گویا کہ سینارٹی لسٹ میں غیر قانونی اندراج کی وجہ سے میری حق تلفی ہوئی ہے۔

(7) اسی طرح آرڈر کی سیرکل نمبر 229 پر مذکورہ خاتون کی سینارٹی مجھ سے کم یعنی 318 ہے۔ اسے بھی گورنمنٹ گرلز پرنمری سکول اوڈیگرام کو تبدیل کیا گیا ہے۔ جو کہ میرا

حق تھا۔ اس آرڈر کی سیرکل نمبر 246 پر مذکورہ خاتون بھی مجھ سے جونیئر 339 نمبر پر ہے اسے گورنمنٹ گرلز پرنمری سکول خوجہ آباد منگورہ بھیجا گیا۔ یہاں بھی مجھے بھیجنے کا زیادہ

انصاف پر مبنی ہوتا۔

(8) دوسرا اصول محکمہ کا یونین کونسل کی بنیاد والا ہے۔ اسی اصول کو بھی میرے کیس میں نظر انداز کیا گیا ہے۔ مثلاً

(9) آپ کی آرڈر سیرکل نمبر 4 پر مذکورہ خاتون کو اس کے اپنی یونین کونسل میں ایڈجسٹ کرنے کی بجائے میرے یونین کونسل ملوک آباد منگورہ میں خالی ہونے والی نشست

پر رکھا گیا ہے۔ اسی طرح میری حق تلفی ہوئی ہے۔

(10) آپ کی آرڈر سیرکل نمبر 15 پر مذکورہ خاتون کو اس کے اپنی یونین کونسل میں ایڈجسٹ کرنے کی بجائے میرے یونین کونسل ملوک آباد منگورہ میں خالی ہونے والی نشست

پر رکھا گیا ہے۔ اسی طرح میری حق تلفی ہوئی ہے۔

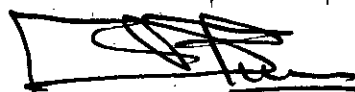
مندرجہ بالا حقائق کی روشنی میں آپ سے درخواست گزار ہوں کہ آپ سے زیادہ سے زیادہ تین دن میں مجھے میرے اپنی یونین کونسل یا مندرجہ بالا سکولوں میں سے کسی ایک پر

ایڈجسٹ کر کے منون فرمائیں۔ تو دعا گور ہوگی۔

عابدہ PST بنت فضل کریم

گورنمنٹ گرلز پرنمری سکول منگورہ سوات

Attested



مورخہ: 01-03-1-2013 Fazi Rabbilaha

Advocate

For Petitioner

Annexure-(1) (25)


OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE AT SAIDU SHARIF SWAT.

OFFICE ORDER.

Consequent upon the acceptance of appeals by the committee, constituted for the purpose held on 2.4.2013, The following PSHT B-15 already adjusted vide this office promotion order issued under Endst:NO.569-74/Promotion/Up-Gradation/PST/F dated 27.2.2013 are further adjusted in the schools noted against each in the interest of public service:-

S.No	Seniority No.	Name of Teacher & School where promoted.	School where re-adjusted	Remarks.
1.	49	Naheed Begum GGPS Dop Manai	GGPS Tahir Abad	Vacant post.
2.	65 x	Jehan Begum GGPS Mian Kalay Tajarai	GGPS M.G.Shaheed	Vacant post.
3.	89	Riffat Parri GGPS Nemogram	GGPS Nagoha	Vacant post.
4.	238	Nargass GGPS Shinkoo	GGPS K.K Shagram	Vacant post.
5.	259	Shagufta Bibi GGPS Chamtalai	GGPS Langar	Vacant post.
6.	290	Hajira Bibi GGPS Lilbanr	GGPS Sperdar Baba	Vacant post.
7.	303	Parveen Akhtar GGPS Sweegalai	GGPS Jawand	Vacant post.
8.	296	Abida GGPS Sotanr	Jaba Kokarai	Vacant post.
9.	140	Rehmat Sultana GGPS Tootbanai	GGPS Quanj	Vacant post.
10.	122	Abida Imtiaz GGPS Karakar	GGPS Dedawar	Vacant post.
11.	450	Shahnaz GGPS Gahil Kalam	GGPS Karakar	Vacant post.
12.	399	Nasim Akhtar GGPS Goda Manai	GGPS Zawra	Vacant post.
13.	345	Zubaida GGPS Kwaroba	GGPS Sherpalam	Vacant post.
14.	402	Noreen GGPS Ayeen	GGPS Shahbuddin Maira	Vacant post.
15.	407	Zeenat Bibi GGPS Talai Kalakot	GGPS Asharay	Vacant post.
16.	493	Shamim Ara GGPS Awisha	GGPS Oghaz Patay	Vacant post.
17.	404	Naheed Akhtar GGPS Kot Doshay	GGPS Shingrai	Vacant post.
18.	528	Naseem GGPS Kuz Shawar	GGPS Chail Maira	Vacant post.

Attested


Fazli Rabbani
Advocate For Petitioners

26

19.	547	Salma Khan GGPS Rameet	GGPS Sabar Shah	Vacant post.
20.	562	Riaz Begum GGPS Chur Penawrai	GGPS Lalo Banda	Vacant post.
21.	599	Nusrat GGPS Toha	GGPS Mangultan	Vacant post.
22.	516	Mehnaz GGPS Bishbanr	GGPS Shaldara	Vacant post.
23.	608	Naheed GGPS Manptai	GGPS Tikdarai	Vacant post.
24.	308	Shahab Majeed GGPS Amlokdara	GGPS Zarakhela	Vacant post.
25.	470	Aisha GGPS kalagai	GGPS Baligram	Vacant post.
26.	175	Zeenat Mahal PSHT GGPS Deran Patai	GGPS Nazar Abad	Vacant post.

Note:- No TA/DA is allowed.

Charge report should be submitted to all concerned.

(DILSHAD BEGUM)

DISTRICT EDUCATION OFFICER

(FEMALE) SWAT

Endst:NO 1182-86 /Promotion/PST/F

Dated 4/4 /013

Copy forwarded to:-

1. The Director E&S Education Khyber Pakhtunkhwa Peshawar for information, please.
2. The DAO Swat.
3. The Sub Divisional Education Officer (F) Swat for further necessary action.
4. All mistress concerned.
5. The Superintendent Local Office.



DISTRICT EDUCATION OFFICER

(FEMALE) SWAT

Attested



Faqir Rabbani (Lawyer)
Advocate for
petitioners

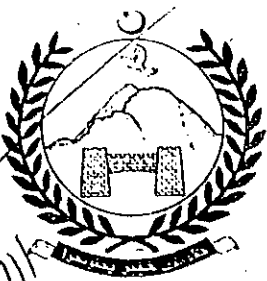
27

Annexure (E)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(PE)4-3/APPTT/PTC Rules.

Dated Peshawar the 25-06-2011.



EATA/MD
25/6/11
To,

Doc (M)

1. The Directress
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.
- 2- All Executive District Officers, — *Serial*
Elementary & Secondary Education in Khyber Pakhtunkhwa.

Subject:- APPOINTMENT/POSTING AND TRANSFER OF PRIMARY SCHOOL TEACHERS IN ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

In continuation of this department letter of even No. dated 3-6-2011 on the subject noted above, I am directed to draw your attention once again to the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 which over-rides the existing rules for appointment of PST teachers and according to which a vacancy of Primary School Teacher shall be filled in from the candidates belonging to the Union Council of their permanent residence mentioned in their Computerized National Identity Card and domicile on merit. As the Act further provides, in case of non availability of candidates in a Union Council where the school is situated such appointment shall be made on merit from amongst the eligible candidates belonging to the adjacent Union Council. Due to the over riding effect of the Act the previous method of recruitment of PST i.e. 60% on merit at the district level and 40% at Union Council level stands null and void and henceforth 100% recruitment of PST shall be made on merit at Union Council level. This applies to the recruitment process initiated after introduction of new service structure notified on 18-1-2011 and recently advertized posts on the basis of EATA tests.

2. In addition to the above I am further directed to state that as per provision of the Act, arrangements for posting of all Primary School Teachers appointed prior to coming into force of the Act be made to the schools of their respective Union Councils and quarterly report sent to this Department. The whole process be completed before 11-5-2012 as envisaged in the said Act.

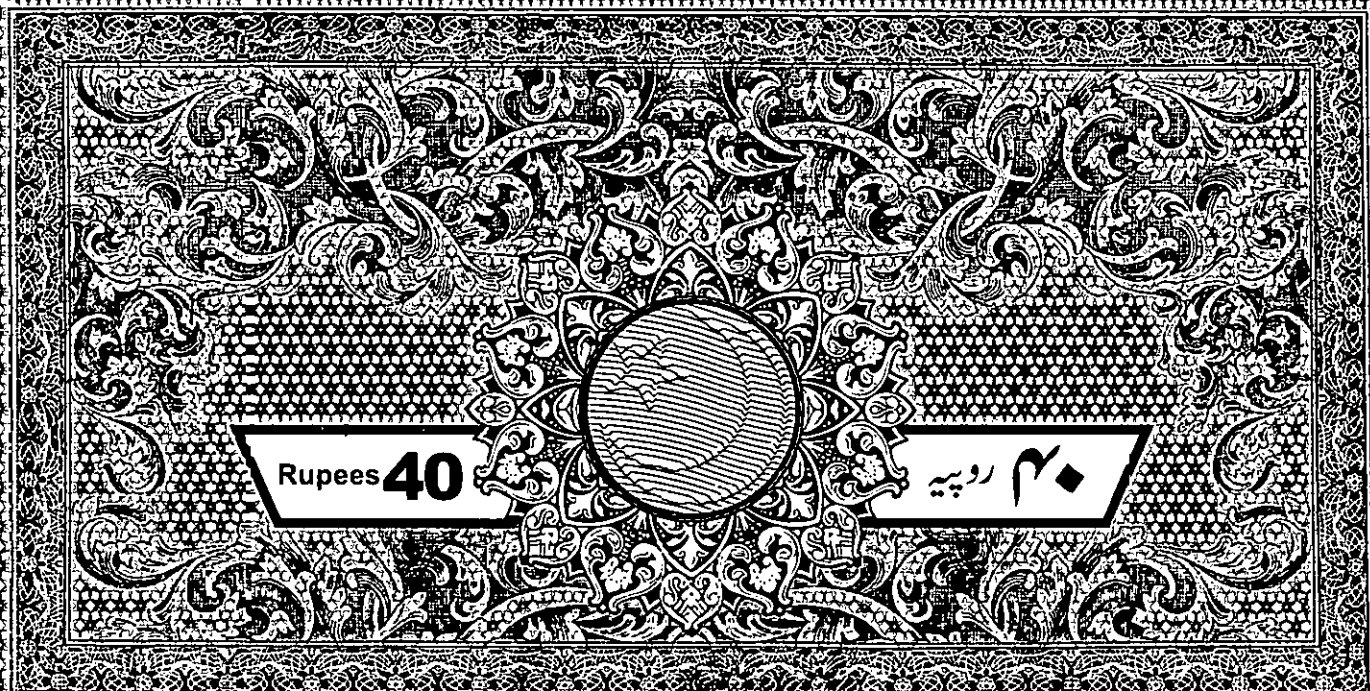
3. In view of the above clarification concerning to 100% recruitment of PST on merit at Union Council level, the Standing Instructions may please be complied in letter and spirit.

Attached

[Signature]

(MOHAMMAD AYUB KHAN)
SECTION OFFICER (PRIMARY)

*Fazli Rabbil Khan
(Amirul Uloom)
Advocate for
Petitioner*



Rupees 40

۲۰ روپیہ

خوار نامہ ظاہری

No: 24 / 25-4-13

معاذ اللہ اللہ تعالیٰ نے منہ سنہ جلوس آباد سیٹھوں کے فیصلہ کو تسلیم و صلح کر کے قبول کیا۔ انگریزوں کے قبضے پر قبضے
 ہوئی اور اس قبضہ پر ضابطہ خود سے اپنے قبضہ کی وہاں بکریاں منگوانے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔
 اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔ اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔
 اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔ اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔
 اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔ اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔
 اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔ اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔
 اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔ اور یہ قبضہ منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔



اس قبضہ پر خوار نامہ ظاہری منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔ 25/13

M. Kahn

Handwritten signature

منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔

منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔

منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔


منگوانے کے لئے اور ان کو اپنے قبضہ میں لے جانے سے منع کیا گیا۔

15602 0506375-7

15602 5114093-4

15602 7028714-7

سہاہ یادوں دستخطیہ سید زینب بیگم سہاہ یادوں دستخطیہ سہاہ یادوں دستخطیہ
50
25-04-13


Muhammad Asrar Khan
STAMP VENDOR
District Courts



9	10	11	12	13		14	15	
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government			
Signature of Government servant	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Period	Government to which debitabale	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₁₃	Agnc.	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	Entry Revised due to one P.Mature fix. wef 01-10-2007		<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₀₇	Re-identification	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	Pay Scale Revised wef 01-07-2008.		<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₀₈	A/Mc.	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₀₇	A/Mc.	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₁₀	A/Mc.	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	Pay Scale Revised wef 01-07-2011.		<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₁₁	A/Mc.	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	30 ¹¹ / ₂₀₁₀	A/Mc.	<i>[Signature]</i>			<i>[Signature]</i>	
<i>[Signature]</i>	<i>[Signature]</i>	Scale upgraded to BPS-14.		<i>[Signature]</i>			<i>[Signature]</i>	

Service Verified wef 11-12-2012 to 30-11-2013 & other Records of the Govt.

[Signature]
S.D.E.O (F)
Pry. Swat.

Forgo of Promotion

EMST-Abada.....
 Forgo my Promotion to BPS-15 as P.S.H.T. wef 1-3-2013

[Signature]
Sign. of Teacher

[Signature]
S.D.E.O (F)
Pry. Swat.

Departmental Pay Fixation in Revised Pay Scale No-14 @ Rs. Scale 610-26300 wef 01-07-2012 vide M.O. No. 1402/S&S/2011 Dated Peshawar 11-12-2011

Pay in Existing pay scale 12 Rs. 16500
 Equal/Next Stage in P.S No-14 Rs. 16540
 Pre-mature Increment Rs. 610
 Pay Fixed on 13/3/2012 vide M.O. No. 14, Rs. 17150

[Signature]
Sub-Div. Edu. Officer (P)
Primary, Swat

(Sanction) BPS-14

Promoted to BPS-14
 Vide DFO (M) Swat Memo No. 325-80
 Dated 22-2-2013

[Signature]
Sub-Div. Edu. Officer (P)
Primary, Swat

T.N. 017
 Date 13-3-2014
 138221

[Signature]

Before Service Tribunal Comp Court Swat

Mst: Abida D/O Fazal Karim V/S Secretary of Education KPK Peshawar.

Service Appeal

Application for with drawl of Appeal

Respect fully she with

1. It is submitted that the title case in pending before this august court for to day.
2. That the applicant does not pursue the case further and with drawn har case.

It is therefore requested that the case may be decided as with drawn.

Petitioner through
Attorney.

Fazal Wahab 

NIC NO.15602-0409279-7

Dated 06. 11 /2014