24.01.2018

None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney for the respondents present. The appeal was called several times till last hours of the court but none appeared on behalf of the appellant nor the appellant was present in person despite issuance of notice to appellant and his counsel. As such the present service appeal is dismissed in default due to non-prosecution. File be consigned to the record room.

ANNOUNCED

24.01,2018

Ahmad Hassan)

Member

Camp Court D.I.Khan

(Muhammad Amin Khan Kundi)

Member

29.11.2017

None present on behalf of the appellant. Mr. Farhaj Sikandar, District Attorney for the respondents present. Notice be issued to appellant and his counsel for attendance for 28.12.2017 before D.B at Camp Court D.I.Khan.

(Gul Zeb Khan) Member

(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

28 12 20 17

Appellant and his counsel is absent. Mr. Farhaj Sikandar, District Attorney for the respondents present. Again notice be issued to appellant and his counsel for arguments for 24.01.2018 before D.B at Camp Court D.I.Khan.

(Muhammad Amin Khan Kundi) Member

Camp Court D.I. Khan

(Muhammad Hamid Mughal)

Member

23.08.2017

10

None present on behalf of the appellant. Mr. Gul Nawaz, ADEO alongwith Mr. Farhaj Sikandar, District Attorney for official respondents No. 1, 2, 4 & 5 present.. Written reply on behalf of official respondents No. 1, 2, 4 & 5 submitted. None present on behalf of private respondent No. 3, therefore, fresh notice be issued to private respondent No. 3 for attendance and submission of written reply. Adjourned. To come up for written reply/comments on behalf of private respondent No. 3 on 27.09.2017 at Camp Court D.I.Khan. Notice be also issued to appellant and his counsel for attendance for the date already fixed.

(Muhammad Amin Khan Kundi) Member Camp Court D.I. Khan

27.09.2017

Brother of the appellant present and Mr. Farhaj Sikandar, District Attorney for respondents present. None present on behalf of private respondent No. 3 despite for notice hence proceeding ex-parte. To come up for rejoinder and arguments on 39.11.2017 before B at Camp Court D.I.Khan.

Member (Judicial)

27.09.2016

Counsel for the appellant and Mr. Gul Nawaz, ADEO alongwith Mr. Farhaj Sikander, Government Pleader for the official respondents No. 1, 2, 4 & 5 present. None present on behalf of private respondent No. 3. Proceeded ex-parte. Written reply on behalf of official respondents submitted, copy whereof handed over to learned counsel for the appellant. To come up for rejoinder on 24.01.2017 at Camp Court D.I. Khan.

Camp Court D.I.Khan

25.01.2017

No one for appellant present. Ms. Ghulam Fatima, SDEO alongwith Mr. Farhaj Sikandar, Government Pleader for official respondents No. 1 to 3 present. Written reply neither official respondents nor private respondents is available on file. Government Pleader is directed to procure the written reply for official respondents and in the meanwhile private respondents be summoned for personal attendance and submission of written reply on next date. To come up for written reply/comments on behalf of official respondents as well as private respondents on 29.03.2017 before S.B at Camp Court D.I.Khan. Notice to appellant and his counsel be also issued for the date fixed.

ASHFAQUE TAJ MEMBER Camp Court D.I.Khari

29.03.2017

Since tour is hereby cancelled, therefore, the case is adjourned for the same on 23.08.2017.

29.12.2015

Since tour to D.I.Khan for the month of December, 2015 has been cancelled, therefore, case is adjourned to 26-2-2016 for the same.

Camp Coon, Darkan

26.01.2016

Counsel for the appellant and Mr. Farhaj Sikandar, GP present and requested for time to contact the respondents. To come up for written reply on 24.5.11 at camp court, D.I.Khan.

MAMBER -Camp Churt, D.I.Khan

24.05.2016

Clerk to counsel for the appellant and Farkhaj Sikandar, GP for respondents present. Written reply not submitted. Notices be issued to the respondents. To come up for written reply on 27.09.2016 at camp court D.I. Khan.

Member

27.4.2015

Counsel for the appellant and Mr. Farhaj Sikandar, GP present. Fresh notices be issued to the respondents through registered post by way of last chance. Case to come up for written reply without fail on 29.09.2015 at camp court, D.I.Khan.

MEMBER Camp Court, D.I.Khan.

29.09.2015

Counsel for the appellant and Mr. Farhaj Sikandar, GP present. The appeal is an old one but the respondents have not yet submitted their written replies. Fresh notices be issued to the respondents. Another last opportunity is given to the respondents to file their written reply on the next date. To come up for the same on 2-3-11-15 at camp court, D.I.Khan.

MEMBER Camp court, D.I.Khan

23.11.2015

Clerk to counsel for the appellant and Mr. Farhaj Sikandar, GP present. None is present as representative on behalf of the respondents. Notices have not been issued despite directions. Office is once again directed to issue notices to the respondents and case to come up for written reply on 29-12-13at. camp court, D.I.Khan.

Mumlas brother of appellant for appellant And GP for respondents No 142 and 445 present Muhammus Javes, Advocate files waterlat nama on behalf of respondent Nais, Reply not received to come up for reply on 30-9-14 at Camp Court D. 1 Kham. Camp Court DIK. Present as before 1-e. on 27-5-2014. 30-9-2014. Case afformal to 29-12-2016 for reply of Camp Court, D. 1- Khan. leanly Regishm Carop Court, DIK. 29-12-14 Cornsel for the appellant present No one is present on behalf of respondents.

Case afformed to 23-2-2015 for reply at Camp Court D. 1. Khan Lana Registrar Camp Count DIK. 23-2-15 Counse for the appellant present. E.P. the respondent also present. Roply not received To come up for reply on 27-4-15 at Camp Court, D. l. Khan, Marson Carrys Caust Dlik,

26-11-2013. Tour & D. 1. Khan has been buscontinued vide order dated 31-10-2013. Therefore notices be issued to the parties for worther riply before Final Bench-11 on 30-1-2014 at Petrawar.

Lines
Registion.

30.1.2014

Attorney for the appellant present and requested for extension of time to deposit security and process fee. Be deposited within 7 days. Thereafter, notices be issued to the respondents for submission of written reply at camp court,

D.I.Khan on 24.2.2014.

MEMBER

MEMBER

Manker

Brother of appellant and Syela Angum EDD. for respondents NO. 1,244,5 with G.P. present wolone is present on behalf of RNOS. G.P. requested for adjournment & file upty To come up for written riply on 24-3-2014 at Camp Court, Dir Khan.

24-2-14

24-3-2014

Munity brother of appellant and G.P. for respondent No. 142 and 495 present. No one is present on behalf of respondent No.3. Notice be issued to R. No.3 for appearance on the education of present up to worther reply on behalf of respondents.

on 27-5-2014 at Camp Court D. 1. Khan.

Camp Court, D.1.K.

Form- A FORM OF ORDER SHEET

Court of	
ase No.	1026/2013

	Case No	1026/2013	
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate	
1	2	3	
1	01/07/2013	The appeal of Mst. Kausar Perveen resubmitted today by Mr. Muhammad Mohsin Ali Advocate, may be entered in the	
	•	Institution Register and put up to the Worthy Chairman for preliminary hearing. REGISTRAR	
2 ,	27-8-2013	This case is entrusted to Touring Bench D.I.Khan for	/
		preliminary hearing to be put up there on $24-9-20/2$ CHAIRMAN	
	24.9.2013	Appellant with counsel present and heard. The learned	
	•	counsel for the appellant contended that appellant has not been	
		appeal would require consideration. Admit Process fee and security be deposited within 10 days. Thereafter, notices be	osjections.
,		issued to the respondents for submission of written reply	
		on 26.11.2013 at Camp Court D.I.Khan. Member Camp Court D.I.Khan	,
`	,	/	
		. *	,

The appeal of Mst. Kausar Perveen Arabic teacher received today i.e. on 14.06.2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of Impugned order dated 4.2.2013 mentioned in the heading of appeal is not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.

No. 01 / S.T,
Dt. 14 / 0 / /2013.

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr.Muhammad Mohsin Ali adv. D.I.Khan

Respected Sir,

- 1. That The Impugned order (Transfer order) dated 4.2.2013 had not provided to the appellant by concerned authority, Therefore, The same is not annexed with the appeal, and the same fact is married in para B' of grounds of appeal.
- 2. That The annexures of The appeal are attested now. It is therefore, humble request that the instant appeal may kindly be fixed before Honourable, Tribund.

Daied: 26-06-2013

Muhammad Mohsin Ali Advocate High Court, D.I. Uhan

Respected Sir,

- 1. That The Imprepted order (Transfer order) dated 4.2.2013 had not provided to the appellant by concerned authority, Therefore, The same is not annexed with the appeal, and the same fact is married in para 'B' of appeal, and the same fact is married in para 'B' of appeal.
 - 2. That The nurseuses of The appeal are attested now. It is therefore, boundle request that The instant appeal may thirdly be fixed before Honournishe, Tribund.

Dated: 26-06-2013

Muhammad Mahsin Ali Advocaje High Court, D.I.Whan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL. PESHAWAR.

Appeal No. 1026 12013		•
Kanaan Bannan		APPFI I ANT
Kausar Perven	VERSUS	AFFEELANT
Director Education Departn	nent and others	DESDONDENTS

INDEX

S #	Description of Documents	Annexure	Page #
1	Grounds of appeal		1-5
2	Copy of Departmental Appeal alongwith Post office receipt & AD Card	A	6-9
3	Copy of Letter no. 3419-23 dated 31-12-2012	В	10
4	Copy of Appointment order dated 31-12-2012 of Respondent no. 3	С	11-12
5	Copy of Newspapers	D	13-14
6	Vakalatnama		15

Dated: 08-06-2013

Humble Appellant

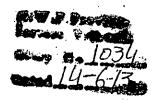
Kausar Perven

Through Counsel

Muhammad Mohsin Ali & Farasatullah Khan Advocates High Court, District Courts, D.I.Khan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. <u>10 26</u> /2013



Kausar Perven Daughter of Abdul Aziz caste Arayen resident of Muhallah Sheikhawala, City Tank. (Arabic Teacher)

.....APPELLANT

VERSUS

- 1. Director, Education Department KPK, Peshawar.
- 2. District Officer (Female) Education, District Tank.
- 3. Sakina Bibi, Arabic Teacher, GGMS Qutab Colony, Tank.
- 4. Govi. of K.P.K Through Secretary Education K.P.K., Peshawar.
- 5. Secretary Education K.P.K, Peshawar. RESPONDENTS

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNALS ACT, 1974

PRAYER; On acceptance of this appeal this august court may be pleased to DECLARE the transfer order of appellant from GGMS Qutab Colony, Tank to GGMS Darki Tehsil & District Tank dated 04-02-2013 vide letter no. 125-126 issued by DEO (female) Tank as illegal, without lawful authority, without jurisdiction, void *ab initio* and ineffective upon the rights of the appellant and is liable to be set aside/quashed on the grounds appearing hereinafter;

<u>OR</u>

co-submitted to (1)

GRANT any other relief considered just and appropriate under the given circumstances of the case.

Respectfully sheweth;

 That the appellant was working as Arabic Teacher (A.T) at Government Girls Middle School Chidhrar, Tank for three years, and served her duty with full of hard work and honestly.

şöğin in in

- 2. That vide letter Endorsement No. 3419-23 dated 31-12-2012 the appellant was transferred from the above said school to Government Girls Middle School Qutab Colony, Tank City, and the appellant resumed the charge in GGMS Qutab Colony and started her duty.
- 3. That on 04-02-2013 vide letter no. 125-126 issued by DEO (female)
 Tank, the appellant was again transferred from GGMS Qutab Colony
 to GGMS Darki Tehsil & District Tank without any reason and the
 second transfer order of the appellant is totally against the law, facts,
 without authority and based on malafide and political victimization.
 Thus the second transfer order vide letter no. 125-126 dated 04-022013 is liable to be reversed on the following grounds:

GROUNDS:

- A. That the after getting the knowledge of the impugned transfer order dated 04-02-2013, the appellant preferred the departmental appeal to the respondent no. 1 but the respondent no. 1 paid no heed. Thus The wondisposal of appeal filed be appellant by respondent no. 1 with standary period is against the law.
- B. That infact, respondent Sakina Bibi was transferred to GGMS Darki due to her promotion, and just after a month

Sakina Bibi again transferred to GGMS Qutab Colony from GGMS Darki on the basis of political interference. According to policy, no one could be transferred before completion of a year when transfer is made on the basis of promotion. Thus the transferred order dated 04-02-2013 is against the law, policy and based on malafide intention, which is liable to be cancelled. Relevant copies are attached. (DEO (female) Tank has not provided the impugned transferred letter to the appellant; therefore the same is not annexed with the appeal).

- C. That the impugned transfer order is based on discrimination and political victimization as the impugned order of the appellant is made just after one month of last transfer, which is totally based on malafide, arbitrary, against the canon of justice, equity and fair-play. Thus the same is liable to be cancelled.
- D. That it is a matter of record that the undersigned has never been communicated the transfer letter by concerned authority and committed material illegality by the authority as the same is necessary one. Thus the malafide is apparent from the face of record. Moreover, at that time, the government imposed the ban upon further transfers of government employees due to election matters.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No.____/2013

Mst; Kausar Perveen

VERSUS

Director Education etc

AFFIDAVIT

I, Muhammad Mohsin Ali Advocate High Court, D.I.Khan,
Counsel for the appellant, do hereby solemnly affirm and declare
on oath that as per information delivered by appellant on the best of my knowledge and belief; and nothing has
been deliberately concealed or kept secret from this Honourable
Tribunal.

R.O.R.A.O
Attested

W. Mo. M. W. W. PUBLICOLINIA

DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No/2013	
Kausar Perven	APPELLANT
<u>v</u>	ERSUS
Director Education Department an	
- 	RESPONDENTS
ADDRESSES	S OF THE PARTIES
Kausar Perven Daughter of Abdul	Aziz caste Arayen resident of Muhallah
Sheikhawala, City Tank.	
(Arabic Teacher)	APPELLANT
	AITELLANT
Director, Education Departm	nent KPK, Peshawar.
District Education Officer (Feb.)	emale), District Tank.
3. Sakina Bibi, Arabic Teacher	, GGMS Qutab Colony, Tank.
	RESPONDENTS
Dated: 08-06-2013	Humble Appellant
•	y fouras

Kausar Perven

Through Counsel

A I

Muhammad Mohsin Ali & Farasatullah Khan Advocates High Court, District Courts, D.I.Khan.

Affected wording Adv

To

1. 基础 1. 科学

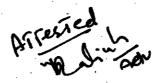
Annex-of

The Director Education, Khyber Pakhtunkhawa, Peshawar.

Subject: Departmental Appeal against transfer of appellant vide order endorsement no. 125-126 dated 04-02-2013.

Respected Sir:

- 1 That the appellant was working as Arabic Teacher (A.T) at Government Girls Middle School Chidhrar, Tank for three years, and served her duty with full of hard work and honestly.
- 2. That vide letter Endorsement No. 3419-23 dated 31-12-2012 the appellant was transferred from the above said to Government Girls Middle School Qutab Colony, Tank City, and the appellant resumed the charge in GGMS Qutab Colony and started her duty.
- 3. That on 04-02-2013 vide letter no. 125-126 issued by DEO (female) Tank, the appellant was again transferred from GGMS Qutab Colony to GGMS Darki Tehsil & District Tank without any reason and the second transfer order of the appellant is totally against the law, facts, without authority



and based on malafide and political victimization. Thus the second transfer order vide letter no. 125-126 dated 04-02-2013 is liable to be reversed.

4. That infact, one Sakina Bibi was transferred to GGMS Darki due to her promotion, and just after a month Sakina Bibi again transferred to GGMS Qutab Colony from GGMS Darki on the basis of political interference. According to policy, no one could be transferred Sakina Bibi before completion of a year from GGMS Darki as she was transferred on the basis of promotion. Thus the transferred order dated 04-02-2013 is against the law, policy and based on malafide intention which is liable to be cancelled. Relevant copies are attached. (DEO (female) Tank has not provided the impugned transferred latter to the appellant, therefore the same is not annexed with the appeal).

Daued: 14-02-2013

Your's Sincerely,

Kausar Parveen

D/o Abdul Aziz R/o Muhallah

Sheikhanwala, Tank

City.

A.T GGMS Qutab Colony, Tank City.



OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTAR SECONDARY EDUCATION TANK

OFFICE ORDER

The adjustment / transfer of the following teacher is hereby ordered in the best interest of public service with immediate effect.

,	S.N	Marrie of Teacher & 👵	From	T-	
,	1 Note		CCA46	GGMS Qutab Colony Tank	Remarks Against Vacant post

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

Executive District Officer E&S Education Tank

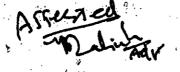
Endst: No. 3419-23

Dated Tank the 31 / 12 /2012 .

Copy of the above is forwarded for information to:

- 1 The District Accounts Officer, Fank,
- 2 The District Officer, (E) E&SE Tank
- 3. The Budget & Account Officer, Local office.
- 4. The ADO (Establishment), local office.
- 5. The Headmistress School concerned.

Executive District Officer E&S Education Tank







OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION, TANK

ORDER:

Consequent upon the recommendation of the Departmental Selection Committee Endst. No.3359-62 dated 31/12/2012, the following candidates being qualified are hereby appointed as Arabic Teacher (AT) Female in the school/ Office noted against their names on Merit in BPS-15 (8500-700-29500) plus usual allowances as admissible under the rules in the interest of public service w.e.f the date of taking over charge on the following Terms & Conditions.

OPEN	MERIT	<u> </u>		·		
5.พื้อ	Name & Add: ,	Fathers Name	Domicile	Morit Position	Place of Posting	Remarks
1	Worki Sabra Kalsoom GGPS	Asmat Ullah	Tank	64.9545	GGMS Dabara	
2	No 2 T≱ink Sakina jan GGP≾*	Noor Khan	Tank	64 6749	GGMS Ali Khel	,
	ેW/Collany ૈ Tasteem ktusar GGPS ം	Muhammad Jan	Tank	64.5370	GGMS Daraki	J'.
5	G.Shahbaz Shabnum Bibi GGPSS	Sona Khan	Tank	61.5233	GGMS Chadrer	· · · · · · · · · · · · · · · · · · ·
	Qutab Collany	Hassan Jan 🧳	Tank	60,6802	GGMS Abizer	

TERMS & CONDITIONS

- 1. Their service will be considered as regular but without pension/gratuity in term of section-19 of the DWFP Civil servant Act-1973 as amended by KPK Civil servant Act-2005. However, the PST appointed prior the implementation.
- ? They will contribute CPF @ 10%-of the minimum of pay @10% contribution will be made by the Govt.
- Bioly will be governed by such rules and regulation as prescribed by the Govt. from time to time for category of Govt
- 1. The appointments of the candidates mentioned above are subject to the condition that they should have domicile of District Tank.



- Their services are liable to termination on one-month notice or resignation with the prior notice one-month pay shall se forfeited. 4
- The candidates should join the post within 30 days.
- They are required to produce Health and Age certificate from Medical Superintendent concerned before the taking over charge.
- Charge should not be given to the overage candidates.
- They are required to furnish copies of all their Certificates/Degrees along with the original receipts and their photo copies, pertaining to the verification fee of concerned Board/University through concerned Drawing Disbursing Officer. The DDO concerned will arrange verification of all Certificates/Degrees of the appointee of their respective School / Office and will issue clearance certificate to each appointee for release of his pay.
- 10. The declaration of assets should be obtained from them immediately & placed on record.
- 11. Charge Reports should be submitted to all concerned.

(GHULAM QASIM.)

Executive District Officer Elemy: & Secy: Edu: Tank

Dated Tank

Copy of above is forwarded for information & necessary action to:

- The Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar. 1.
- * The District Coordination Officer, Tank w/r to his No & dated cited above. Q 2.
 - 3. 4. The District Officer (M/F):E&SE Tank
 - District Accounts Officer, Tank
 - 5. ADO Estab: Local Office,
 - Principal / Headmistress Concerned. 6.
 - Official Concerned.

Executive District Officer

Elemy:&Secy:Edu: Tank

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Lutaid Selfenz Jusce

meezaneadel2012@gmail.com http://www.meezaneadel.com شاره12 (07 فرور ك 2013 مرجسرات 25ريخ اول 1434 هـ 26 ما كام مخانة 8 اليت 8 ملية

نا کم (پیرور پورٹ) محر تعلیم ناک کی چرتیاں پابندی کے سینورٹ کے بعد 31 رئیر کو ال او کولی تھے کا لوئی کر فیا کم اور مرف

بغومرا ترمرا

بدجود فاقول غراب كول ليم كا جاد كروا كيايداك مادى وورى إد الكيد ماد بعد 4 فردى كواكيد بار يحر إيد فواى كان درك كروا كا بدهرة عي بطورات في نجركام كروي في كرار كا جادل تين سال فيور إدرا

766471

روزیامه میزان مدل (7) ، جعرات 07 فرا

مثلات كالالك لمفادات كاتحفظ كباادرآ نے کہا کہ فرم دیکے پر خار س ون الع الريد ا بعوائد كوبر يم كعث عمد وفاست ما دّ كمثل كالمبر يم أنه ملاتے تکرفوان کے آیا لويمنا لون كولوا بم كريد 1105 2 وارسه فلاف مازها تعاول ستصخلنحن ك

تساری قائل ما زی از اس کا - ج کر -خان دالی مود ، مک تر بشم خان محدود ، مک جادیدا آبان محدد ادر مکرها مدین کاکمیا تما ارمسود آباکر پخت وفق وم ہے۔ قام اکستان اور جارمتم کےدوران کو وقائل نے مك كي دفاع كي خا لمرازع الرائي تعداد عي بام فبارت ول کا بار می ارک وران است. بام فبارت ول کا بار ار کی افرکن وران کا افرادی معمل مدر ایک فرن ک نانه بنانه او سال کا افرادی معمل مدر ایک فرن ک نانه بنانه او سال کا آل ماكري لا كمنافاكر 2008 ، كم مام القاء ك والت جولي ووبرستان كے فو ك اسميل كے ملقداي اے - +1 60 - 2 En Wals 1/42 اسل ارملتراس کے فال براموں فرا کر کو ا مام اتوات کیلے ایمی ورامل فال مران شاہ ے بائی ایک اور قال اندہ مام اتحات ہی مرم رصد لیکس برارے کالی کرے اللہ ماديد اقبال محدود كا كما قل كدوه جول وزيستان روں وی اسل کے طفر سے افغالت اوا با ين المول في كاكروه ودتاك كالساك والف عالمول في والمار مرم مالت عم كزامل ے بدیا مود تاک کی درے کہا کے کے جہاں عمر مورک الحق فراع مان الگ کے کی تم مان الل عدم بهد د إد كمائي بي بد قرار ك ف ست كم بإيناه ل عن كاكبنا في كرام وبأل في أحر كامه

کیا و دو مسوتال کا فرویل کا ادار کری کے اسوتال کے مرد بال کے مرد کا اور ملک کلد اس در کرسند ار نوالهلا<u>يما</u>-المار لا اندلات برمائے كا مقاليا ؟ فريندمأ مركا فاحراد ر المرال 25 المرال المدات المرال المدات

ندکی کے امر - بدی ارتفاق موام جاری عی جلا تعبيد ف يرما برياز برشري الله إقوالك كا يك مر المالي كل المينيون والي بس عن في سول وال ے امام کی میرون ہے۔ می مرفر ک کدکی ہے اوم المرے بات اللہ اللہ جن سے بر بوار کفن المار ال عرف يون كالدرة عال موجات الدلاوي الدرك وقاعت بمماآت بالفيش فتستكلت ساست الى مل ن يندا فيريال ما والا بال ے زر کل ک منال کا سالہ کیا ہے۔

المرل المريخ ال ى رابلد كروپ كا جان ادا كى كى يكردى جزل اكل الدين احلا ادروزي فارجه مناد بال كركى معادت یں اوآ کی سریدہ اجلاس کی سائٹ لائٹر پر ہوا۔ سیکراری جزل اوآ کی سی سند سمبر معمری موام کی احقویا ادراقرام حمده كى قرار دادول كى مائى مل كرك كى مرورت براور وا ای على وزع فارجه مارال رور سے دور کی داملاکرد یہ کیا جاری سے نظام عمل کی کر بدارت کی محل دل فرمنز عفر فسطیم جم می حمات عمل بنتی دروح الدوجل فرمنز عدف متالد می کر تھے ہو ری ہیں۔ انہوں نے عقر در مشمر می ایک کی ترول کی فیر مالداران فمقعات كالمحى مطالب كيا-

فرقد داریت مرقد دارید درشت کرداند کار داری مسل فرس کورد دال ک بانب كرنا بابق بن ادرملان عى تفرق إلى ك ذر مع سلمانون كوا بسمى لزانے كى سازشى كى جارى فيد بن د في سسلان المرين ما ل ما ل یں چین مازی قریمی میں بدا کرنے کے درے ایں۔ میں ظراتماد داخال کے ذریعے ان مازی فرقن کم اسے درم مقاصد میں اکام بنانا ہوگا۔ ادرائے طاقے ا وروس قام اس کے لئے تعدور و الل كرمقالمه كرنابوكا متررين كاكهنا فعاكدون عماشيد ان، استانیں ہے - سامدوالم ارکا بول بدہشت من سليالون كوريشاف كردى كانشانه ما كرسلمالون كو كزدر ترغ يع بر حن بال اي عالم کے ہمائی بیدار او یکے ایں۔ اب الن وشنوں کی جالی کامیاب میں اس کی ۔ امیال نے کماکدارہ عمرا اید مالات يوارد ي عرف الدير المال فير بيداركيا كما ادر ايره امن كولل المستركت وكال آرُم أرَيش ودورري تقيول في الم المالون مِين من سليل من آئي من أنها أن والأكون في عزال محد

چشرود با إ بار إ جاورا عال مم كردوان ملاسة

رون ين كول م 5194 ين كو إلى عاماً الماري من الماري عام الماري ال وميرتكيل وي كي وي آل بروكريس كفلي كوراين واكرفر مارف نے چينگ كاسلىلىمارى ركمانوات

ا میراد از ایران می اوث افراد کے ایکس می دست لينے ي سلل معالمات رفور كے لي اسلام آ إد عمل ن منعقد مونے والے ایک اجلاس عی کیا کیا ہے۔ چیف اليش كمشرجش ريثائر والخرالدين في ابرائيم كى مربراى مِي منعقده إيلاي هِي آينده عام انتفايات عمر كافذات یں سدور بوں میں سواہ ہا، جات سا ہو میں ا امرز کی میں کیس کی اور کی کے اوے میں کی مطوات مامل کرنے کی تجویز دی گئی ہے۔الیشن کیفن کے ایوسٹن کیر فری افغال مان نے ایس حوالے سے قالی ک الماس يم رياري لوكر عال يمرك يا بندي ما يمرك كانبط كرت دائ - كام اسده عمرال المثن مشرف برس بر إبدى كى كاللت كى ادركها ك اليش كمشزز في لوكر مول بربايندى كي ماعت كادر كاك جب موجود و محرمت الى مت بردى كرف جارى كے قا اس مرتبى بر مروال النشن كى داما عدل كى دمرف عمل آتا كے الكش كيشن في الله سركارى اداروں عمل مرتین کا ولی لیتے ہوئے اس مل بر ایندی عائد کردل می جس پروفاقی تحرمت نے چیف ایس کیمین کوفلاکھ ترفيط رُنظر إِنْ كَا مِلَالِ كِمَا فَا - بِنِدَ أَيْشِ كَمْشِر بسنس بازو خرالدین بی اہاہم ہے طاقات می کی می ایکش کیفن کے اجلاس می دفاقی لیس مسب کے مر بری کی جاب سے لیے مجے علا پر می فود کیا گیا جم یں کہا تھا کہ توشد ال سائل کے دزبان سافہ لیسد، سے زائدارکان پارلیٹ ادرمو الی اسلیوں کے ارکان تے جس اور کوشوارے می فیص کروائے ۔ اجلاک علی جرید دی کی روام احوات میں کا خذات و اور لی عمل کی کو ادا مل کے بارے میں کو ایک خانے کا مشافد کی بائے ۔ اجلاس عمر فیدلر کیا م کو ایکن کیٹ کیل کی ادا میل اور مخلف ویکوں سے اللے می قرضوں کی ادا میل اور مخلف ویکوں سے اللہ میں اور مخلف کے اور میں اور میل م

ارے میں تغییات طلب کرے ماادرایے افراد کے

ل 48 مال تعم جمل کی ممل بوی فوت فی مجم درمری شادی میلید 35/40 سالہ بوء ری ساخ ادر قیک خانون کی شرورت سے اس ت کی کرئی تید لیس ے رابا 03339950684

تاريك مد م کے اٹن حکام سے مطالبہ کیا کدا نکا جادلہ فور کی طور پر منسوخ کیا جائے اگر ان کا تبادلہ منسوخ نہ کیا حمیاتہ وا مدالت كاورواز وكمنظمنا كمن كحا-

مالد ارتیں مالد ارتیں املام آباد (آن لائن) ملك مرش كرشد تمن روز _ ماری ارشوں کے بعد ڈیموں عمل پان کا سے معاصر کا 47 بزار 500 كوسك ، ترول ايم عل 8 برار 600 امد كل آل وفاري اشافه الماء علاا المم كياكيا ب تريلان كي كياكي ف بلديون كي بيد 1436 و المن المرافق المرافق المرافق ويرس عن قالي استمل بال كالاخر و27 الم 12 فروك

رموش برنے داسلے اطام کے مطابل ذیروا ما میل دارا اللہ اسکے دو الران كوا مك كريد من ترق ويدى كل ب ال حوال ے ایمین داخاش ب دوران در کنڈی کو کرفے 18 ے کر فیر 19 می افیر چنل سر نشدن امینز کے 18 = را 18 مل اید ل کی بیر برست الله الله مدات مرد و ای خدات مرد و این خدات مرد و این مدات مرد و این میر و از من مرد ارش کو اگر به 17 = کرفید 18 میراند میراند کا این میراند کا این میراند و این کا ب ادروہ کی افی موجردہ برس خدمات مرانجام دے مے اس حوالے سے ڈیرہ اسائیل خان کے موالی وساتی صنوں نے دونوں اضران کوتر تی لئے برمبار کیا دی دی ے اور ایکسین وایڈ اس سب و ویژن سے مطالبہ کیا ہے

كزشة جوين ممنون مي سنكا ويم مي بالي كي آ مر مي كومك اضاف ريكارؤكما كمياء فلذ فاركاستنك إديزان سے مطابق مک مرمی جاری حالیہ 3 روزہ ارشوں کے 47 برار 500 كومك اشاف كرماق إلى كا آم عى 72 بزار 335 كيرىك ادر افراع 28 بزار كيريك ریارزی کمیاروی می ال کی کانت اصاف کے ماتر 20 1134 ن ريادا ك كناى لمرح زطاليم عي 6 برار 600 كيوبك اخاف كرسات بالى ك آد 43 فرار 800 كيوسك بوكن اورافيان 30 فراد كوسك ديكامل

المرادة المركزة عاللاد بالمركز لذكن ماع يتميدان من اورمولا بالرواط ابزادساب

وروام كاساكة

کے خالی مارتہ وال

سے کھرے کڑی خیبورج

دوران اشتباری لمز

ت ایک رائعل اِد

كيشت بسءا ملامرة

بهتی استراز فال

يدرو فرازدومها

ه گراد با ۱۰ ای طرح ا

الأقبانه كينية بكراد

2440312

ع کساکا مقد سادری تم

10,01

کامریوں شمادیک

وكل أسيرما ويجيون

المرص كالميلان

بدين ما دائيا حرص ف کاکميا

بمخدمتهايه

1.3

(June الته بحداثاً . かがていく لومان ميكنوك

ورق المائد أن المائد أن



عركها كريم في رسيل سيساب كه طالت كالشال كاركر

ابت ميل موار البول سفي كما كم باكتان اور الدمتان

مرمد پر مشکات بری بی جی اس کے اورود اکتان نے

رمد إركاروا يون المورو فوروا عيد إكتال الحال

آگی مااؤں کے جات اُن صدی کنودل ماسل مراہا ہے جو دو برارلو میں سنتیں فی صدفیا شیری رحمان نے دودن

معرور شد کردی کرد کے علی کارگر فارت اور نے کے موال

ا بنا بنك و إ ما عدة . إ مرورا أن كال يل و مر بك كل ظورِي دي مائ فريب لوك تؤاك الألك ال

مِن مِكْمِ مِن أَ لِهُ وَال كَي كَلِيهِ إِنَّا مِنْ الْمَالُولُوا الْمُوالِ

کی م میتے ہیں۔ آج کل کراہ پال ردب ہے۔ آدگی توا کر ہیں میں من اور جائی ہے۔

پروفیسرابرا بیم

الممارينون في لوشره ك ملاقد باروفيل عمد المني تسبيل

مد جد شال کا اے س اور کار س

14 5

(मोलांग्नाम्युविकाराम्यः=

وتعرب المالانيان الأبالية 700007= 767.13) -

יפנישיי צייניית ستروشة ومنواع كه المستريم والمري

الهزار وحستما

09

نے کہا کہ بورڈ مکومت کا خود میاراوارہ سے محراس کر انعیالی فبزرته سوتا کے لیے مراد طریقہ کار بر ممارز آمد کیا جاتا ہے۔ جس ہے کر تھا: بالمالة للينتظ

تاريوں عن بورا عن تعياتياں كى كى يى-انبول في اس

امر کی وضاحت کرتے ہوئے کہا کہ یہ فبر مرامر محمولًا الد حقیقت کے منافی ہے۔ امیوں نے کہا کہ بعض عناصر اید ا

انظام پرائ م کے بانات ساد او دالتا جاتے ہیں۔ محر ایسے منامرے ام کی فور پر موب میں بول کے۔ انہوں

وكالتانا دعوى ياجرم موس ایسل باعث تحرراً نكه مقدر مدرجه بالاعزان عمل في طرف واسط بيروي وجواب وى برائ بيثى يا تعفيد مقدم المين و مراح و مين المعرف كيا المعرف من ا کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں بیش پر خود یا ہما بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت بکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کرول کا اگر پیٹی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی دید سے کسی طور میرے خلاف ہو کمیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں مے نیز وکیل صاحب موصوف صدر مقام کچبری کے علاوہ یا کچبری کے ادقات سے پہلے یا چیھے یا بروز تعطیل پیردی کرنے کے ذمہ دار نہ ہوں مے اور مقدمہ صدر کچبری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا کچبری کے اوقات کے آگے یا پیچیے پیش ہونے یر مظہر کوئی نقصان مینچے تو اس کے ذمہ دار یا ایکے واسطے کی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں مے مجھ کوکل ساخته بر واخته صاحب موصوف مثل کرده ذات خود منظوروقبول ہوگا اور صاحب موصوف کوعرض دعوی یا جواب دعوی یا ورخواست اجراء اسائے ڈگری نظرنانی ایل محرانی و ہرفتم درخواست ہرفتم کے بیان دینے اور پر ٹالش یا راض نامہ و فیصلہ برحلف کرنے اقبال دعوی کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیشی مقدمه مزکور بیرون از کیجری مدر پیروی مقدمه مزکور نظر ثانی ایل و نگرانی و برآ مدگ مقدمه یا منسوخی ذکری یک طرفه یا درخواست تکم امتنای یا قرتی 🚅 یا مرفاری قمل از فیملد اجرائے ڈگری مجی صاحب موصوف کو بشرط ادائیگی علیحدہ مخانہیروی کا افتیار ہوگا اور تمام ساختہ پرداختہ صاحب موصوف مثل کردہ از خود منظور و تبول بو ما اور بصورت ضرورت صاحب موصوف کو به بھی افتیار ہو کہ مقدمہ مزکورہ یا اس کے کمی جزو کی کاروائی یا بصورت ورخواست نظر ٹانی ائیل محمرانی یا دیگر معالمه و قدمه ندکوره کمی دومرے وکیل یا بیرسٹر کو اینے بجائے یا اینے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے افتدارات حاصل ہوں کے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جر کچھ ہر جانہ التواء بڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیٹی سے پہلے اوا نہ کروں گا تو صاحب موصوف کو پورا افتیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایک صورت یں میرا کوئی مطالبہ کی فتم کا صاحب موصوف کے برخلاف جہیں ہوگا للذاوكالت نامه لكددياب تاكسندرب 12013 (15) مضمون وكالت نامدن لياب اوراجهي طرح سجه لياب اور منظورب

orcepted &
Direvied
MP Duh
pdv

کو فرربرو بن - <u>محمدینی</u> (ایبیلان^ک)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWÁR

Service Appeal No. 1026/2013

				(Ammallant)
	Th		•	(Appellant)
Mari	Kansar Pa	rveen		 · · · · · · · · · · · · · · · · · · ·
17151.	1XGUSUL LU	I TOOM STITLE		

Versus

Govt: of K.P.K through Secretary (E&SE) Deptt: (Respondents)

WRITTEN REPLY ON BEHALF OF RESPONDENTS NO. 1, 2, 4 & 5

Respectfully Sheweth,

Respondents humbly submit as under:

PRELIMINARY OBJECTIONS

- 1. That the appeal is badly time barred.
- 2. That the appeal is not maintainable and incompetent.
- 3. That the appellant is stopped due to his own conduct.
- 4. That the appellant has got no cause of action and locus standi.
- 5. That the appellant has not come to the Tribunal with clean hands.
- 6. That the appellant is bad for misjoinder / non-joinder of necessary parties.
- 7. That the appellant has concealed the material facts from Honourable Tribunal.
- 8. That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal.
- 9. That as per section 10 of Civil Servants Act, 1973. Every Civil Servant shall be liable to serve anywhere within or outside the province.

BRIEF FACTS

- 1. This Para needs no comments as pertains to record.
- 2. This Para also needs no comments as pertains to record as well.
- 3. This Para is incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies. The competent authority can transfer a Civil Servant in light of Section 10 of Civil Servants Act, 1974.

This Para is correct to extent that as per guidelines communicated to the district officers, the senior most teachers may retained in the present posting but the Competent authority can tansfer4 a civil servant in light of section 10 of Civil Servant Act, 1974.

ROUNDS:

- A. The representation was examined, considered and rejected by the competent authority.
- B. This Para is incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies.
- C. This Para is also incorrect vehemently denied. The appellant was neither subjected to any kind of discrimination nor was any political pressure asserted on the respondents.
- D. This Para is incorrect not admitted.
- E. This Para is legal hence no comments.
- F. This Para needs no comments.

<u>PRAYER</u>

It is therefore, most humbly prayed that on acceptance of this Para wise comments, the appeal being devoid of legal footings and merit may graciously be dismissed with cost.

Secretary .

Govt: of Khbber Pakhtunkhwa

Elementary & Secondary Education Deptt:

Peshawar

Responden No. 4 & 5

District Education Officer (F)

Districy Tapk

Respondent No. 2

Director

Govt: of Khyber Pakhtunkhwa

Elementary & Secondary Education Deptt:

Peshawai

Respondent No. 1

ing lompetent

This Para is correct to extent that as per guidelines communicated to the district officers, the senior most teachers may retained in the present posting but the Competent authority can , Dansfer4 a civil servant in light of section 10 of Civil Servant Act, 1974.

#-QUNDS:

- A. The representation was examined, considered and rejected by the competent authority.
- B. This Para is incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies.
- C. This Para is also incorrect vehemently denied. The appellant was neither subjected to any kind of discrimination nor was any political pressure asserted on the respondents.
- D. This Para is incorrect not admitted.
- 1. This Para is legal hence no comments.
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PRAYER

It is therefore, most humbly prayed that on acceptance of this Para wise comments, the append being devoid of legal footings and merit may graciously be dismissed with cost.

ectetary

Godi: of Khlyber Pakhtunkhwa

Hemoniary & Secondary Education Deptt:

Peshawar

Boshonden No. 4 & 5

Govt: of Khyber Pakhtunkhwa

Elementary & Secondary Education Deptt:

Peshawar

Respondent No. 1

District EdifyreKillor

Ustrick and

Respectation No. 2

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LIFE HONODISVBLE SERVICE TRIBUNAL KPIK PESHAWAR

Service Appeal No. 1026/2013

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(Instlayda)			nəəvraf ussur	A asM

Ciovi: of K.P.K through Secretary (F&SE) Depti: (Respondents)

" HELLIEN BEELLY ON BEHALE OF RESPONDENTS NO. 1, 2, 4 & 5

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: - bondents humbly submit as under:

THE PRINCIPAL OBJECTIONS

- :. That the appeal is badly time barred.
- That the appeal is not maintainable and incompetent.
- That the appellant is stopped due to his own conduct.
- That the appellant has got no cause of action and locus standi.
- That the appellant has not come to the Tribunal with clean hands.
- and and the state of the state
- That the appellant is bad for misjoinder \ non-joinder of necessary parties.
 That the appellant has concealed the material facts from Honourable Tribunal.
- 3. That the Fionourable Service Tribunal has no jurisdiction to entertain the instant appeal.
- 9. That as per section 10 of Civil Servants Act, 1973. Every Civil Servant shall be liable to serve
- anywhere within or outside the province.

EXTENTE

- This Para needs no comments as pertains to record.
- This Para also needs no comments as pertains to record as well.
- This Pars is incorrect not admitted hence veheniently denied. The orders of the posting variansfer were made in the interest of public service as per rules and policies. The competent numberity can transfer a Civil Servant in light of Section 10 of Civil Servants Alet, 1974.

TORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAW.

Service Appeal No. 1026/2013

Mist.	Kausar	Parveon	 	,	 	(Appellant)

Versus

Govt: of K.P.K. through Secretary (E&SE) Deptt: (Respondents)

. RETTEN REPLY ON BEHALF OF RESPONDENTS NO. 1, 2, 4 & 5

specifully Sheweth,

. c pondents humbly submit as under:

OCCUPANTARY OBJECTIONS

- .. That the appeal is badly time barred.
- It the appeal is not maintainable and incompetent.
- That the appellant is stopped due to his own conduct.
- 1 That the appellant has got no cause of action and locus standi.
- That the appellant has not come to the Tribunal with clean hands.
- 6 That the appellant is bad for misjoinder / non-joinder of necessary parties.
 - That the appellant has concealed the material facts from Honourable Tribunal.
- 8. That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal.
- What as per section 10 of Civil Servants Act, 1973. Every Civil Servant shall be liable to serve anywhere within or outside the province.

ERIEF FACTS

- 1. This Para needs no comments as pertains to record.
- 2. This Paralalso needs no comments as pertains to record as well.
- This Para is incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies. The competent authority can transfer a Civil Servant in light of Section 10 of Civil Servants Act, 1974.

This Para is correct to extent that as per guidelines communicated to the district sculor most teachers may retained in the present posting but the Competent authorized Lansfer4 a civil servant in light of section 10 of Civil Servant Act, 1974.

ROUNDS:

- A. The representation was examined, considered and rejected by the competent authority.
- B. This Parais incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies.
- C. This Para is also incorrect vehemently denied. The appellant was neither subjected to any kind of discrimination nor was any political pressure asserted on the respondents.
- D. This Para is incorrect not admitted.
- F. This Para is legal hence no comments.
- 1. This Para needs no comments.

HEAYER.

It is therefore, most humbly prayed that on acceptance of this Para wise comments, the appeal being devoid of legal footings and merit may graciously be dismissed with cost.

Secretary

Govit: of Khyber Pakhtunkhwa Edementary & Secondary Education Deptt:

Pesilawah

Responden No. 4 & 5

Govt: of Khyber Pakhtunkhwa

Elementary & Secondary Education Deptt:

Peshawar

Respondent No. 1

District Balifordia

ici/fank

Kespeilden No. 2

Service Appeal No. 1026/2013

Mst.	Kausar l	Parveen	• • • • • • • • • • • • • • • • • • • •	 	 	(Appellant)
						\ 1 1 /

Versus

Govt: of K.P.K through Secretary (E&SE) Deptt: (Respondents)

WRITTEN REPLY ON BEHALF OF RESPONDENTS NO. 1, 2, 4 & 5

Respectfully Sheweth,

Respondents humbly submit as under:

PRELIMINARY OBJECTIONS

- 1. That the appeal is badly time barred.
- 2. That the appeal is not maintainable and incompetent.
- 3. That the appellant is stopped due to his own conduct.
- 4. That the appellant has got no cause of action and locus standi.
- 5. That the appellant has not come to the Tribunal with clean hands.
- 6. That the appellant is bad for misjoinder / non-joinder of necessary parties.
- 7. That the appellant has concealed the material facts from Honourable Tribunal.
- 8. That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal.
- 9. That as per section 10 of Civil Servants Act, 1973. Every Civil Servant shall be liable to serve anywhere within or outside the province.

BRIEF FACTS

- 1. This Para needs no comments as pertains to record.
- 2. This Para also needs no comments as pertains to record as well.
- 3. This Para is incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies. The competent authority can transfer a Civil Servant in light of Section 10 of Civil Servants Act, 1974.

4. This Para is correct to extent that as per guidelines communicated to the district officers, the senior most teachers may retained in the present posting but the Competent authority can tansfer4 a civil servant in light of section 10 of Civil Servant Act, 1974.

GROUNDS:

- A. The representation was examined, considered and rejected by the competent authority.
- B. This Para is incorrect not admitted hence vehemently denied. The orders of the posting / transfer were made in the interest of public service as per rules and policies.
- C. This Para is also incorrect vehemently denied. The appellant was neither subjected to any kind of discrimination nor was any political pressure asserted on the respondents.
- D. This Para is incorrect not admitted.
- E. This Para is legal hence no comments.
- F. This Para needs no comments.

PRAYER

It is therefore, most humbly prayed that on acceptance of this Para wise comments, the appeal being devoid of legal footings and merit may graciously be dismissed with cost.

Secretary

Govt: of Khyber Pakhtunkhwa

Elementary & Secondary Education Deptt:

Peshawar

Respondent No. 4 & 5

Director

Govt: of Khyber Pakhtunkhwa

Elementary & Secondary Education Deptt:

Peshawar

Respondent No. 1

District Education Officer (F)

District Tapk

Respondent No. 2