

Appeal No. 1029/2013  
Mst. Mubarak Jan

10.

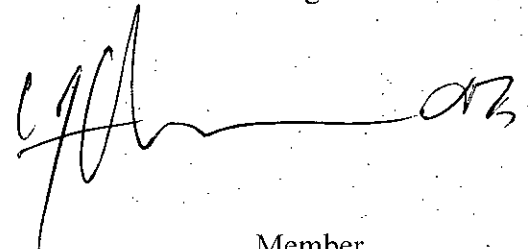
19.06.2014

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing especially on the point of maintainability on 02.09.2014.

  
Member

02.09.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Assistant Advocate General for the respondents present. Learned counsel for the appellant requested for withdrawal of the appeal. In this respect his statement also recorded. As such the appeal in hand is dismissed as withdrawn in limine. File be consigned to the record.

  
Member

ANNOUNCED  
02.09.2014

Counsel for Appellant  
I want to withdraw the  
instant appeal.  
Jawid  
02/09/2014

7.  
04.03.2014

Clerk to counsel for the appellant and Mr. Zia Ullah, GP for the respondents present. Clerk of counsel for the appellant requested for adjournment due to general strike of the Bar. To come up for preliminary hearing on 16.04.2014.

  
Member


8.  
16.04.2014

Clerk of counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Clerk of counsel for the appellant requested for adjournment due to general strike of the Bar. To come up for preliminary hearing on 06.05.2014.

  
Member

9.  
06.05.2014

Appellant in person and Mr. Ziaullah, GP for the respondents present. Appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 19.06.2014.

  
Member

28.10.2013

Counsel for the appellant (Mr.Aamir Shahzad, Advocate) present and partly heard. The learned counsel for the appellant requested for further time to prepare arguments on maintainability of the appeal in view of bar contained in Section-4(b)(i) of the NWFP(KPK) Service Tribunal Act,1974. To come up for further preliminary hearing on 02.12.2013.

  
Chairman

5. 02.12.2013

Counsel for the appellant present and requested for adjournment. Pre-admission notice be issued to the learned AAG/GP to assist the Tribunal on the point of maintainability on 20.01.2014.

  
Member

6. 20.01.2014




Clerk to counsel for the appellant and Mr. Muhammad Jan, GP for the respondents present. Clerk to counsel for the appellant submitted an application for adjournment as his counsel was busy in the High Court, Peshawar. To come up for preliminary hearing on 04.03.2014.

  
Member

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 1029/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02/07/2013	<p>The appeal of Mst. Mubarak Jan resubmitted today by Mr. Aamir Shahzad Malik 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>
2	16-7-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>24-9-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	24.9.2013	<p>No one is present on behalf of the appellant. To come up for preliminary arguments on maintainability of the appeal on 28.10.2013.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Mubarak Jan W/O Majeed Gul C.T Teacher AT GGHS Shadan Distt. Buner, received today i.e. on 24.06.2013 is incomplete on the following scores which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellatant.
- 2- Annexures of the appeal may be attested.
- 3- Address of respondent No.4 is incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal Rules 1974.
- 4- Copy of appointment order is not attached with the appeal which may be placed on it.
- 5- Index of the appeal may be prepared according to Khyber Pakhtunkhwa Service Tribunal rules 1974.

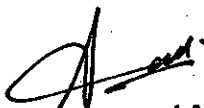
No. 957 S.T,

Dt. 25/06 2013.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Aamir Shahzad Malik Adv. Peshawar.

*Objection removed & completed the files & return to the office but as far as appointment letter would be provided at the time of preliminary arguments if needed.*

  
Aamir Shahzad Malik  
Advocate  
High Court Peshawar

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No ..... 1029/..... 2013

**MST. MUBARAK JAN**

**VERSUS**


**EXECUTIVE DISTRICT EDUCATION OFFICER ELEMENTRY &  
SECONDARY EDUCATION BUNEER & OTHERS**

**I N D E X**

S.no	Description of documents	Annexure	Pages
1	Service Appeal		1--5
2	Addresses of parties		6
3	Appointment Letter Dated: 22/12/1994 & Transfer order Dated: 12/09/2006	"A" & "B"	7--9
4	Application copy	"C"	10
5	Transfer order	"D"	11
6	Departmental appeal	"E"	12
7	First transfer order		13

  
Petitioner

Through

  
Aamir Shahzad Malik  
&  
Zahid Ullah Khan  
Advocates High Court  
Peshawar

**Aamir Shahzad Malik**  
Advocate  
High Court Peshawar

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service appeal no 1029/2013

~~1064~~  
24-6-13

Mst Mubarak jan w/O majeed gul As C.T Teacher At G.G.H.S  
shadan District Buner.

..... (Appellant)

....Versus....

1. Executive District Education Officer Elementary and Secondary Education Buner.
2. Director Elementary and Secondary Education KPK, Peshawar.
3. District Education officer Buneer at Daggar.
4. Deputy District officer near D.C.O office at Daggar Buner. *Education*
5. Mr. Mah-e-tala C.T teacher at G.G.M.S koza nawagai, illaqa Chamla, District Buneer.

..... (Respondents)

" SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT , 1974 AGAINST THE IMPUGNED ORDER DATED: 28 / 02 / 2013 , WHEREBY THE APPELLANT WAS NOT TRANSFERRED FROM THE POST OF G.G.H.S SHAHDAN TO G.G.M.S KOZA NAWAGAI AND RESAPONDENT NO. 5 WAS ILLEGALLY POSTED / TRANSFERRED TO G.G.M.S KOZA NAWAGAI WHICH IS TOTALLY ILLEGAL AND BASED ON MALAFIDE INTENTIONS".

~~24/6/13~~  
24/6/13

Co-submitted to ~~Prayer in Appeal~~ and filed.

*2/7/13*  
On acceptance of this instant service appeal, this Hon'ble Tribunal Court may graciously be pleased to set aside the impugned order of transfer dated: 28 / 02 / 2013 and the appellant may kindly be posted/transferred at G.G.M.S koza Nawagai.

**Respectfully Sheweth;**

Appellant very humbly submits as under;

1. That appellant was appointed on 22/12/1994 and was transferred/posted as C.T teacher at G.G.H.S shadhan on 12-09-2006 and performing her duties very efficiently and honestly till now.(copy of the appointment letter and transfer order are attached herewith as annexure A &B).
2. That since long appellant being a lady and having married life performing her duties away from her home station .i.e nawagai hence appellant on availability of vacant vacancy moved an application dated 17-02-2013 to the respondents for her transfer to her home station at G.G.M.S koza nawagai. (copy of the application is attached herewith AS ANNEXURE C )
3. That on 28 / 02 / 2013 respondents have issued the impugned transfer letter of respondent no.5 to G.G.M.S koza nawagai instead of appellant without any need and tainted with Malafide intentions & in utter disregard of procedure available on the subject of transfer.  
(copy of impugned transfer order is attached herewith as Annexure "D" )
4. That feeling aggrieved from the above said order of transfer appellant filed departmental appeal on 04 / 03 / 2013 to the respondent no 1.  
(Copy of the departmental appeal is attached herewith as Annexure "E" )
5. That on departmental appeal of the appellant no decision what so ever made and no information is provided to the appellants by the respondents.
6. That appellant mortally aggrieved from the impugned order of transfer dated: 28 / 02 / 2013 and inaction on departmental appeal dated 04 / 03 / 2013 appellant



preferred this service appeal on the basis of following amongst other grounds , which are as under :-

### GROUNDS

- (a) That the impugned order of transfer dated:- 28.02.2013 is illegal , perverse and against the law & respondents have not treated appellant in accordance with law , rules and policy available on subject and acted in violation of art – 4 alongwith other relevant articles of the constitution of Islamic Republic of Pakistan.
- (b) That the impugned order of transfer dated: - 28 / 02 / 2013 is not in accordance with law rules available on subject because since long appellant was not transferred and she is performing duties at G.G.H.S shahdhan from 2006 away from her home station nawagai and entitled to transferred near to her home station being a lady and having married life where as respondent no.5 who was transferred once to the station at G.G.M.S makhranai recently on 28-01-2011 and again transferred to the station of G.G.M.S koza nawagai on 20/02/2013 which is illegal and based on malafide intentions and violating the rights of appellant hence the impugned order is based on Malafide intentions & is illegal one and liable to be set aside.
- (c) That the impugned order of transfer is totally illegal because appellant is a senior teacher while the respondent no5 is junior teacher and she was appointed later on after the appointment of appellant and appellant is doing her job at G.G.H.S shahdhan from last 7 years and she was not transferred despite the fact appellant has foremost right to be transferred to G.G.M.S nawagai when she found a vacant vacancy there and she applied for transfer but respondents with their malafide intentions and illegally transferred respondent no.5 to the G.G.M.S nawagai which is totally illegal order and is liable to be set aside.

- (d) That impugned transfer order dated: 28 / 02 / 2013 is illegal and not maintainable and based on melafide because the appellant is resident of village nawagai and G.G.M.S shahdhan is situated at a distance of one and half hour from nawagai an being a married lady it is very difficult for appellant to cover a such long distance and she is covering the same from the last 7 years but respondents did not consider this very important aspect hence impugned order is liable to be set aside.
- (e) That impugned order of transfer dated: 28 / 02 / 2013 is illegal because no personal hearing chance was given to appellant and the impugned orders are passed in utter disregard of the principal of natural justice i.e. Audi altaram partarem hence the impugned order in respect of appellant transfer is liable to be set aside.
- (f) That appellant therefore various reasons /quarries and causes the impugned order are not maintainable and not lawful , therefore liable to be set aside and assumed the jurisdiction not vested in it by any law and is patent & gross illegality.
- (g) That appellant will take to seek the permission of the Hon'ble Tribunal to advance some more grounds at the time of hearing of arguments.

It is, therefore, prayed that On acceptance of this instant service appeal , this Hon'ble Tribunal Court may graciously be pleased to set aside the impugned order of transfer dated: 28 / 02 / 2013 and the appellant may kindly be posted on seat / station at G.G.M.S koza Nawagai.

Dated: 24/6/2013

  
Petitioner  
Through

  
**AAMIR SHAHZAD MALIK**  
AND

5

*[Handwritten signature]*

**ZAHID ULLAH KHAN**  
*Advocates High Court*  
*Peshawar*

**AFFIDAVIT**

I, Mubarak jan w/O majeed gul R/O  
of do hereby solemnly affirm  
and declared on oath that the contents of appeal are true and  
correct to the best of my knowledge and belief.

*[Handwritten signature]*  
**ATTESTED**

*[Handwritten signature]*  
**Deponent**

**Oath Commissioner**  
*Amjad*  
*Shaheen*  
*17.6.16*  
**District Courts Peshawar**

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service appeal no \_\_\_\_\_ 2013

MST. MUBARAK JAN.....VERSUS..... EDO (E & S) BUNEER & OTHERS

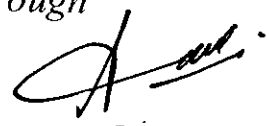
ADDRESSES OF PARTIE

1. EXECUTIVE DISTRICT EDUCATION OFFICER ELEMENTARY AND SECONDARY EDUCATION BUNER.
2. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION KPK, PESHAWAR.
3. DISTRICT EDUCATION OFFICER , BUNEER AT DAGGAR.
4. DEPUTY DISTRICT EDUCATION OFFICER NEAR D.C.O OFFICE AT DAGGAR BUNEER.
5. Mis. Mah-e-tala C.T teacher at G.G.M.S koza nawagai, illaqa Chamla, District Buneer.

DATED: 24/06 /2013

  
PETITIONER

Through

  
AAMIR SHAHZAD MALIK  
Advocate High Court  
Peshawar

Aamir Shahzad Malik  
Advocate  
High Court Peshawar

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[Redacted line]

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[Redacted mark]

Date of Estt: \_\_\_\_\_

Up-gradation ~~Pr~~ to Middle 01-10-1998 Middle to High to Higher Secondary 09/2012

Detail of Posts

S.No	Posts	Sanctioned		Working	
		Regular	Contract	Regular	Contract
1	Principal/H M	01	-	-	-
2	V.Principal	-	-	-	-
3	SS	-	-	-	-
4	SET	03	-	-	-
5	CT	03	-	02	01
6	Librarian	-	-	-	-
7	DPE	-	-	-	-
8	PET	01	-	-	-
9	DM	01	-	-	01
10	AT	01	-	01	-
11	TT	01	-	-	01
12	Qari	01	-	-	-
13	Lab Assistant	-	-	-	-
14	SI/Clerk	-	-	-	-
15	J/C	01	-	01	-
16	Lab Attendent	01	-	01	-
17	N. Qasid	01	-	01	-
18	Sweeper	01	-	-	01
19	Kidar DINA	01	-	-	01
20	Behishti	01	-	01	-
21	Gate Chow	02	-	01	01
22	Math Bearyar	01	-	-	01

Classwise Enrolment

S.No	Class	Enrolment		Total
		Boys	Girls	
1	6th A	-	81	81
2	6th B	-	-	-
3	6th C	-	-	-
4	7th A	-	87	87
5	7th B	-	-	-
6	7th C	-	-	-
7	8th A	-	62	62
8	8th B	-	-	-
9	8th C	-	-	-
10	9th A	-	57	57
11	9th B	-	-	-
12	9th C	-	-	-
13	10th A	-	35	35
14	10th B	-	-	-
15	10th C	-	-	-
16	11th	-	-	-
17	12th	-	-	-
18		-	-	-
Total				322

Detail of furniture / Miscellaneous

S.#	Item	Number	Condition	Required
1	Office Table	01		05
2	Teacher Table	25		10
3	Teacher Chair	64		50
4	Desk	165		100
5	Bench	115		100
6	Stool	50		100
7	Almirah	08		10
8	Black Board	-		10
9	Baltic	01		10
10	Fawara	01		05
11	Water Cooler	10		20
12	Flag	02		05
13	Lock	30		-
14	Fans	128		20
15				
16				
17				
18				
19				
20				

Available Facilities in the School

S.NO	Facility	Exit	
		Yes	No
1	Electricity	Yes	-
2	Water Supply	Yes	-
3	B/Wall	Yes	-
4	Toilets	Yes	-
5	First Aid	-	-
6	Prayer Facility	-	-
7	Play Ground	-	-
8	Class Room	07	-
9	Laboratory	01	-
10	Library	-	-
11	Covered Area	-	-
12	Un-Covered Area	-	-
13	Space for Addition	-	-

COOK. VACANCIES

S.No	Name of Post with details	Date	Reason for Vacancy
1	H. Mistress - 01	31-7-01	Transferred
2	SET (Gen) - 01	30-11-06	"
3	SET (Gen) - 02	30-4-05	"
4	PET - 01	19-2-3-012	"
5	Baria - 01	14-3-012	"
6	Total (06)		

Endst No \_\_\_\_\_ Date 30-9-2012  
 Forwarded to the District Officer (M/F) School & Literacy Buner in triplicate for onward submission to the quarter concerned please

Attested by

Amir Shahzad Malik  
 Advocate  
 High Court Peshawar

Head Mistress  
 G.G.H.S. Shandora  
 District Buner  
 Principal/Head Master/Head Mistress

گورنمنٹ گزٹ ہائی سکول کے معاہدہ (امان کے) صلح نوٹس

MONTHLY RETURN/STAFF STATEMENT OF GHSS/GCHSS/GHS/GGHS/GMS/GGMS Shadani FOR THE MONTH OF Sept: 2008 2012.  
 School Code 36457 Circle \_\_\_\_\_ Ph: No \_\_\_\_\_ U/C Armoji Teshil Mardan District Buner.

09/2012.

S.No	N.I.C No (old)	Name	Post	F/Name	BPS	Qualification		D/O Birth	D/O 1st Apptt:	D/O pro to the present post	D/O T/O charge in the present School	Subject in M.A/Misc.	Subjects Allotted	Residence
						Acad	Prof:							
1	115-83-106694	Mihazat Bibi	C.T	Muht. Ybrahim	15	M.A	B.Ed	29-02-77	04-3-93	01-11-05	08-9-06	Asla	-	Nawajai Buner
2	115-74-118525	Mubark Jam	C.T	Said H. Shah	15	B.A	B.Ed	01-4-74	22-12-94	09-12-04	12-9-06	-	-	Nawajai Buner
3	42201-7081067-6	Nadia Saleem	C.T	Muht. Salim	09	B.Sc	B.Ed	18-02-85	24-02-02	24-02-02	24-02-02	-	-	Nawajai Buner
4	115-81-297667	Tasmeen Bibi	A.T	Sherin Rasool	09	B.A	B.Ed	03-6-81	1-12-99	09-12-99	01-4-05	-	-	Tanjai Buner
5	115-77-016883	Raham Zeba	D.M	Amir Abbas Khan	09	B.A	D.M	07-7-77	25-8-99	25-8-09	13-4-02	-	-	Khanpur Buner
6	115-86-354556	Farhat Axa	T.T	Liaqat Ali	07	B.A	B.Ed	05-4-86	01-12-04	01-12-04	13-6-06	-	-	Nawajai Buner
7	115-82-297847	Sanzamin Khan	J/C	Bakht Afzar	07	M.A	B.Ed	20-3-82	18-11-99	18-11-99	02-01-01	Pak Study	-	Shadani Buner
8	115-58-166960	Sahib Zar	M/R	Abdul Halim	02	-	-	23-5-58	24-5-92	24-5-92	24-5-92	-	-	Langar Buner
9	115-80-209338	Riaz Muht. LIAH	LIAH	Delawar Shah	02	SL	-	25-11-80	26-11-98	26-11-98	26-11-98	-	-	Shadani Buner
10	115-64-050190	Tajbar Shah	Besh	Shor Khan	02	-	-	01-6-64	26-5-99	26-5-99	26-5-99	-	-	Shadani Buner
11	115-74-249587	Mahboob Ali	Chow	Bahram Shah	02	-	-	03-3-74	26-11-98	26-11-98	26-11-98	-	-	Shadani Buner
12	115-85-357642	Ashraf Bibi	Swp	Mir Zada	01	-	-	1985	08-6-05	08-6-05	28-6-05	-	-	Shujar Buner
13														
14	15101-3812321-9	Bakht Sher Rawan	Private	Ahmad Khan	04	-	-	01-01-84	01-11-01	01-11-2011	01-11-2011	-	-	Najai Buner
15	15101-8699049-3	Bakht Rawan	Beor	Ahmad Khan	01	-	-	01-3-73	01-11-01	01-11-2011	01-11-2011	-	-	Najai Buner
16	15101-5828187-7	Sharif Khan	Chow	Ahmad Khan	01	-	-	1979	01-11-01	01-11-2011	01-11-2011	-	-	Najai Buner
17	15101-3811001-1	Noor Zamin Shah	Cook	Paindad Khan	01	-	-	01-01-91	01-11-01	01-11-2011	01-11-2011	-	-	Najai Buner
18														
19														
20														

MIN BOOK & SPORTS CENTER  
 and General Order Suppliers Swari Buner Ph. 555007

Attested by  
**Aamir Shahzad Malik**  
 Advocate  
 High Court Peshawar

Head Mistress  
 G. H. S. Shadani  
 District Buner

Page No T

Principal/Head Master/Head Mistress

ADJUSTMENT:-

Consequent upon functioning/starting of the newly up-graded High/Middle Female Schools. The following teachers are hereby adjusted at the schools noted against each on their own pay & scale with immediate effect in the interest of public service.

S. No.	Name of Teacher	Post	From	To	Remarks
1	Miss: Nizakat	CT	GGHS Cheena	GGMS Koreya	NCP
2	Miss: Omy Kalsoom	CT	GGHS Shadam	GGMS Koreya	NCP
3	Miss: Mahitalat	CT	GGMS Charorai	GGHS Shadam	VS No.2
4	Miss: Hameeda	CT	GGHS Shadam	GGHS Cheena	VS No.1
5	Miss: Pervin Shaheen	CT	GGMS Batanai	GGMS Sura	NCP
6	Miss: Shakira	CT	GGHS Shadam	GGMS Sura	NCP
7	Miss: Mubarak Jan	CT	GGMS Charorai	GGHS Shadam	VS No.6
8	Miss: Fatima	CT	GGMS Katkaha	GGMS Batai	NCP
9	Miss: Nihayat	CT	GGHS Jowar	GGHS Shadam	VS No.4
10	Miss: Rabihat	CT	GGHS Bazargai	GGMS Swarai	VS No.11
11	Miss: Rabiya Begum	CT	GGMS Swarai	GGMS Koreya	NCP
12	Miss: Shahnaz Bibi	CT	GGHS Jowar	GGMS Sura	NCP
13	Miss: Maryam Bibi	CT	GGHS Pachakalay	GGHS Batai	NCP

Note:

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

(SULTAN ZEB)  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY BUNER.

Indst No. 7126-29 Dated: 5-9-06

Copy of the above is forwarded to the:-

1. Director Schools & Literacy S.W.P. Peshawar
2. District Accounts Officer Buner.
3. Assistant District Officer (B&A) Local Office.
4. Principals/Head Masters and Teachers concerned.

(Signature)  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY BUNER.

Attested by

(Signature)  
Aamir Shahzad Malik  
Advocate  
High Court Peshawar

Attested



GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE

CERTIFICATE OF TRANSFER OF CHARGE

Ann-B

Certified that I Miss Mubark Jan C.T  
before noon taken over charge of the office of G.G.Hs Shadani Buner  
have this day after relinquished

E.D.O Schools & Literacy Buner with reference to the order of the N.W.F.P. Government  
No. Transfer order no. 7126-2A dated 05-9-2006 19

transferring Mr. Shakira Bibi C.T  
to G.G.Hs Shadani Buner

2. Particulars of Cash and Important / Secret / Confidential documents handed over / taken over are noted on the reverse.

Signature of relieved Government Servant [Signature]

Designation C.T

Signature of Government Servant receiving Charge [Signature]

Station G.G.Hs Shadani

Date 12-09-2006 before noon 19

Rndst, No. 174-1 dated 12-9-2006

From [Signature]

- To
1. The Accountant General, N.W.F.P. Peshawar.
  2. E.D.O (S&L) Buner
  3. D.A.O Buner at Dajjan
  4. D.O(F) Secy. Buner
  5. Officials concerned

Attested by [Signature]  
Aamir Shahzad Malik  
Advocate  
High Court Peshawar

The charge of the office of G.G.Hs Shadani Buner  
was transferred from Mr. Shakira Bibi C.T  
fore noon of the 09-9-2006 19  
after 12

[Signature]  
Mad Mistress

To,

(4) (10)

The DEO (Male) Elementary & Secondary Edu; Distt; Buner.

Through:- D.O (Female) Elementary & Secondary Edu; Distt; Buner.

R/Sis,

Ann<sup>o</sup> C<sup>o</sup>

with the great sense of veneration I have honour to state that I have been performing my duty as C.T teacher since 08<sup>09</sup>/<sub>2006</sub> to upto date at GGHS Shahdum. while my first appointment date is 08<sup>12</sup>/<sub>2004</sub>. The mentioned above school is a farflung area. It is very far up to me. Being a woman I face much more difficulties especially in transport regard. Moreover, I have completed my station tenure long before. I am senior than other female teachers surrounding me.

Now I have come to know that there is lying vacant a C.T post at GGMS Nawagai.

Therefore, keep in view, my right and above mentioned difficulties, I request in your kind consideration that kindly transfer me from GGHS Shahdum to GGHS Nawagai and oblige.

Yours Sincerely,  
Mrs. Mubarak Jan C.T  
GGHS Shadam (Amzai)

DBO (F) Buniad  
Pk Transp of  
upon in request  
of team.

17.02.13  
Minister of Education & Secondary Education  
Khyber Pakhtunkhwa  
Islamabad

Attested in/

*Amir*  
Amir Shahzad Malik  
Advocate  
High Court Peshawar

Ann - "D"

OFFICE OF THE DISTRICT EDUCATION OFFICER(F) BUNER.

OFFICER ORDER.

As approved by the competent authority the following Teachers are hereby transferred/adjusted to the school noted against their names on their own pay & scale from the date of taking over charge in the interest of public service.

S.NO	Name Of Teacher	From	To	Remarks
1	MISS; Zahida PET	GGHS Korea	GGMS Koza Nawagai	
2	Miss: Mahi Talat CT.	GGMS; Makhranai.	GGMS Koza Nawagai	
3	Miss: Nihayat CT.	GGHS; SHADAM	GGMS Makhranai	

Note:-

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

(SURRIYA BEGUM)  
DISTRICT EDUCATION OFFICER(F)  
ELEMENTARY & SECONDARY  
BUNER

Endst: No. 296-98 / Dated 28/2 / 2013.

Copy of the above is forwarded to the:-

1. District Accounts Officer Buner at Daggar.
2. Headmistress Concerned.
3. Officials concerned.

DISTRICT EDUCATION OFFICER(F)  
ELEMENTARY & SECONDARY  
BUNER

Attested by

*Aamir*  
Aamir Shahzad Malik  
Advocate  
High Court Pehsavar

محرمہ خطاب ڈی ای او صاحب اعلیٰ عدالت سندھ پٹی ایجوکیشن کونسل  
اسٹیل

صا۔ عالی!

خودمانہ گزارش کی حالتی ہے۔ کہ دفتر ہذا سے جو ٹرانسفر آرڈر اسٹیوٹو

ہیں۔ اس میں دفتر سٹاکو نا اہل نامی ہوئی ہے۔ میں نے ٹرانسفر کے لیے

مقامیہ درخواست دی تھی

✓ سفادت لی ہے  
آرڈر میں موجود دونوں استانیوں میں سے ایک اور میں جاہ طلبت

Tenors اور service کے لحاظ سے جو نئے ہیں

لینڈ آف۔ حاصل سے گزارش کی حالتی ہے۔ کہ میرا شمار GGHS

شادم امازی سے MS نا وہ گی کو عمل میں لا کر انصاف کے  
لصالحوں کو پورا کیا جائے۔ فقط!

الرفیقہ

عبداللہ

سنہ مبارک سال آج

GGHS شادم امازی کونسل

فورم 2013-3-4

Attested by

*Aamir*

Aamir Shahzad Malik  
Advocate  
High Court Peshawar

**ORDER**

Consequent upon approval of the competent authority the following (CT/TA female) teachers are hereby transferred/adjusted to the schools noted against their names on their own pay & scale from the date of taking over charge in the interest of public service.

No.	Name of Teacher	From	To	Remarks
1	Miss. Wahida CT	S Sawawai	GGMS Nogra	N.C.P
2	Miss. Verwantikor CT	Panjtar	GGMS Ghazi Kot	Working on wrong post.
3	Miss. Nazia CT	GGMS Kass Koroon	GGMS Nogra	N.C.P
4	Miss. Nasrin CT	GGHS Panjtar	GGMS Kass Koroon	V.S. No. 5
5	Miss. Hamida CT	GGMS Kass Koroon	GGHS Panjta	V.S. No. 4
6	Miss. Mahetalat CT	GGHS Shadam	GGMS Makhanai	N.C.P
7	Miss. D. Jala Begum CT	GGMS Kingargalai	GGMS Amaze Koto	N.C.P
8	Miss. Zahidman Zari CT	GGMS Kingargalai	GGMS Makhanai	N.C.P
9	Miss. A. Anani CT	GGMS Pangora	GGMS Amaze Koto	N.C.P
10	Miss. Shahzad DM	GGHS	GGMS Amaze koto	N.C.P
11	Miss. D. Anam DM	GGMS Dapal	GGHS Sura	V.S. No. 10

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

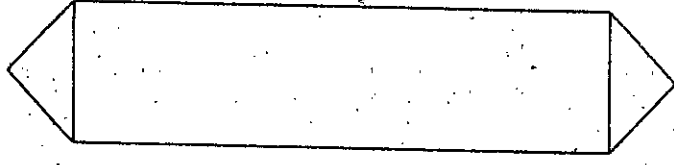
Encl: No. 8651-53 / Dated. 28/11/2011.  
 Copy for information is forwarded to the;  
 1. District Account Officer Buner.  
 2. Principals/ Head Mistress Concerned.  
 3. Teachers Concerned.

EXECUTIVE DISTRICT OFFICER  
 ELEMENTARY & SECONDARY  
 EDUCATION BUNER

(Signature)  
 (SIRAJ-UR-SHAH)  
 DISTRICT OFFICER  
 ELEMENTARY & SECONDARY  
 EDUCATION BUNER

*Attested by*  
  
**Aamir Shahzad Malik**  
 Advocate  
 High Court Peshawar

بعدالت حسند محکمہ بحوالہ سرویس ٹریڈ مارک



2013ء پنجاب سماعت مبارک علی

24 جون مورخہ

سماعت مبارک علی بنام ES & DE کوئٹہ

سروس اور پبل مقدمہ دعویٰ

جرم

### باعث تحریر آنکہ

امیر شاکزاد علی کوئٹہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے لیے عاشر شاکزاد علی مندرجہ ذیل پر اللہ تعالیٰ سے دعا ہے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جو تب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ

سب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوگا

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

Attested & Accepted by

Aamir Shakzad Malik Advocate High Court Peshawar

Zahid Ullah Khan Advocate High Court

Zahid Ullah Khan Advocate High Court

2013ء

24 جون

المرقوم 24

العہدہ کے لئے منظور ہے۔

محمد علی ولد امیر اعظم (صاحب خاص)

7-0650504-10151-21M2 CNIC: 15101-4050590-7

"A"

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

PH

No.

APPEAL No. 1029 of 20

Mst. Muबारک Jan PT Teacher

Appellant/Petitioner

Versus

E, D, E, O (E & SE) Binney,

RESPONDENT(S)


Notice to Appellant/Petitioner

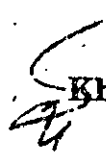
GP

Govt Pleader Service Tribunal Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-1-2014 at 8:00 AM

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

  
24-12-13

  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

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

*PH*

No.

APPEAL No. *10291* of 20*13*

*Mst Mubarak Jan*

Appellant/Petitioner

Versus

*E D E O ELSE*

RESPONDENT(S)

*AAG*

*AAG/JP*

Notice to Appellant/Petitioner

*Govt of KPK Service Tribunal Peshawar.*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *20-1-14* at *8:00 am*

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

*[Signature]*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

*[Signature]*

*24-12-13*



Before the N.P.K Service Tribunal, Peshawar

Mst. Mubarak Tana

Vs.

EDO. E & S Buner

Application for Adjournment

Respectfully Sheweth,

- i) That above title case is pending before this Hon'ble court & fixed for today.
- ii) That counsel for the Appellant is busy in the Peshawar High Court, Peshawar.

It is therefore prayed that on acceptance of this application the case may kindly be adjourned to an other date.

Dated: 20/12/2014

Appellant

Through

Faiz ul Bari  
(Assistant)

Through



Amir Shahzad Malik  
Advocate High Court  
Peshawar