

redressed as such the appeal is disposed of without further proceedings. File be consigned to the record.

ANNOUNCED

02.02.2015

**CHAIRMAN
Camp Court Swat**

02.02.15
2

[Faint handwritten notes and signatures]

(S.O. 2015)

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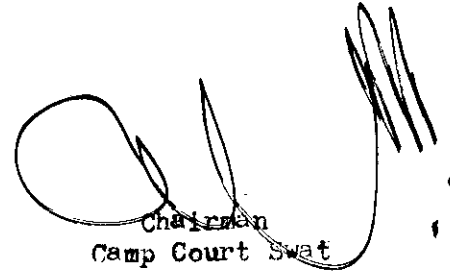
13.10.2014 Counsel for the appellant (Mr. Imdadullah, Adv.)

and Mr. Muhammad Zubair, Sr. G.P for the respondents present.

Neither representative of the respondents is present nor the requisite sanction/order has been provided so far.

101 1870
102 1870 0000

Therefore, the DEO(F) ^{2700.00.50} Dir Lower (Respondent No.3) be summoned in person alongwith the requisite sanction/order for further proceedings at camp court Swat on 01.12.2014.



Chairman
Camp Court Swat

1-12-14.

Counsel for the appellant and Muhammad Tariq ADO with G.P. for respondents present. The Tribunal is incomplete. To come up for record/preliminary hearing at camp court Swat on 2-2-2015.



Lead.

10-

02.02.2015

Counsel for the appellant and Mr. Jan Bakht Said, Supdt: on behalf of DEO alongwith Mr. Muhammad Zubair, Sr. G.P for all respondents present. Submitted office order bearing Enst: No. 3734-36 dated 6.11.2014 vide which DEO(F) Dir Lower at Timergara has transferred the appellant to GGHS Nagri (P) against vacant post of SET.

Learned counsel for the appellant, in view of the afore-stated development, requested for disposal of the appeal.

Since the grievances of the appellant have been

5.5.2014

8

Mr. Aziz Ahmad, husband of the appellant, on

behalf of the appellant and Mr. Tariq Ahmad, ADO Dir Lower
on behalf of respondents with Mr. Muhammad Zubair, Sr. GP

present. In response to the offer made by the respondent-
department on the previous date for posting of husband
of the appellant at a nearby school/station, husband of
the appellant stated that they would rather wait for
sanction of another school at a nearby place as he has
children and the school where the appellant has been
posted is situated at a distance of around 60 k.m. as

appointed counsel for the appellant is not present due to
strike of the Bar, to come up for further proceedings
at camp court Swat on 5.8.2014.

Chairman
Camp Court Swat

5.8.2014

8

Mr. Aziz Ahmad, husband of the appellant, on behalf

of the appellant with counsel (Mr. Imdadullah, Advocate)

and Mr. Tariq Ahmad, ADO Dir Lower on behalf of respondents

with Mian Amir Qadir, G.P present. Representative of the

respondents informed that the sanction, referred to in

the order sheet dated 5.5.2014, is still awaited. To come

up for further proceedings at camp court Swat on 13.10.2014.

Chairman
Camp Court Swat

03.02.2014

Counsel for the appellant and Mian Amir Qadir, G.P for the respondents present. Neither representative of the respondents is present nor record is available for arguments on maintainability of the appeal. The DEO(F),E&SE, Dir Lower or representative of respondent No.3 be summoned again with record, positively, for arguments on maintainability of the appeal at camp court Swat on 7.4.2014.


Chairman
Camp Court Swat

7.4.2014

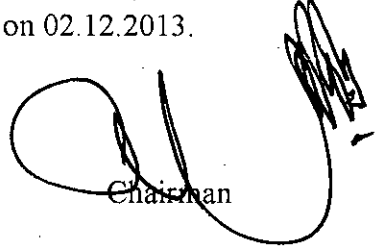
Counsel for the appellant (Mr.Imdadullah, Advocate) and Mr.Gul Badshah, ADO Dir Lower on behalf of respondents with Mr.Muhammad Zubair, Sr.GP present. At the outset, the learned counsel for the appellant contended that the only grievance of the appellant is that after her promotion she has been transferred/adjusted at a place against the spouse policy of the government. The learned Sr.G.P, on the other hand, pointed out that since the appellant was at S.No.8 of the merit list, she could not be given preference over other Arabic Teachers ahead of her in the seniority list under the policy of the government relied upon by the learned counsel for the appellant. The learned Sr.GP, however, stated that the department may consider posting of husband of the appellant at a nearby school. The learned counsel for the appellant requested for adjournment so that either the appellant or her husband is contacted for disposal of the appeal. To come up for further proceedings at camp court Swat on 5.5.2014.


Chairman
Camp Court Swat

3

23.9.2013

No one is present on behalf of the appellant. To come up for preliminary hearing at camp court Swat on 02.12.2013.




Chairman

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02.12.2013

Counsel for the appellant (Mr. Indadullah, Advocate) present and heard. On query, the learned counsel for the appellant referred to order dated 2.3.2013, but the appellant could not possibly be aggrieved of that order because she was promoted as Arabic Teacher Female B-15 and consequently posted at another place. The learned counsel for the appellant submitted that instead of posting the appellant at another place, she should have been adjusted near her home. Since, apparently, no such order is available of which the appellant could possibly be aggrieved and ^{appeal for} posting against a particular post is barred u/s 4(b)(1) of the NWFP (KPK) Service Tribunal Act, 1974, a pre-admission notice be issued to the learned Sr.G.P for arguments on maintainability of the appeal at camp court Swat on 3.2.2014.

2104-2013-11






Chairman
Camp Court Swat

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1024/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	01/07/2013	<p>The appeal of Mst. Sadaqat Begum presented today by Mr. Aziz-ur-Rehman 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	11-7-2013	<p>This case is entrusted to Touring Bench Swat for preliminary hearing to be put up there on <u>18-08-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	7.8.2013	<p>Due to Eid-ul-Fitar, case is adjourned for proceedings as before, on 23.9.2013</p> <p style="text-align: right;"> Reader</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1024 of 2013

Mst. Sadaqat Begum.

.... Appellant

VERSUS

The Secretary E&SE and others.

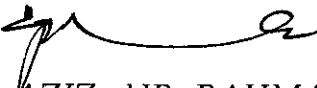
.... Respondents

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S. #	Description of Documents	Annexures	Pages
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4	Copy of the order	A	7-9
5	Copy of the service certificate	B	10
6	Copy of the appeal	C	11-12
7	Wakalat Nama	...	13

Appellant

Through counsel


AZIZ -UR- RAHMAN

Advocate Swat

Office : Gulshan Chowk Khan plaza

Mingora Swat

Cell No. 0300-9070671

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1024 of 2013

Mst. Sadaqat Begum Arabic Teacher at Government
Girls Middle School Sarai Bala, District Dir Lower.

...Appellant

VERSUS

1. The Secretary Elementary and Secondary
Education Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary
Education Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer ERSE
Dir Lower. ...Respondents

*Appeal under Section 4 of the Khyber Pakhtunkhwa
Service Tribunal Rules, 1974 against the order Endst:
No. 5031-35 dated 02-03-2013 made by the
respondent No. 3 against the law, rules and policy of
the Provincial Government and against which the
appellant filed appeal, which still pending disposal
despite the lapse of Statutory period.*

Prayer:

*On acceptance of this appeal the appellant
may be adjusted at a school nearest to her i.e.
either Government Girls High School Nagri
(payeen) or Government Girls Middle School
Sarai Bala, home owing to the Provincial
Government policy on the subject.*

Respectfully Sheweth:

Facts:

- i. That the appellant being entitled was awarded BS-16 while serving at Government Girls Middle School Sarai Bala Timerghara Sub-Division District Dir Lower. She was then transferred / adjusted at Government Girls High School Mian Kalay, Jandol Sub-Division, at a distance of more than 60 kilometers from the home station, where her husband is serving. Copy of the order is enclosed as Annexure "A" and that of the husband service certificate is enclosed as Annexure "B".
- ii. That the adjustment order afore said is based on mala fide, politically motivated and against the policy and merit.
- iii. That the appellant submitted departmental appeal to the respondent No. 2 on 05-03-2013, but despite the lapse of statutory period of time it is not being decided. Hence this appeal on the following grounds. Copy of the departmental appeal is enclosed as Annexure "C".

Grounds:

- a. That the impugned order is against the spirit of the posting transfer of the female employees. The female employees are required to be posted at the station nearest to their / her home.
- b. That the appellant is at Serial No. 8 of the merit list, but she has been not given the benefit of merit.
- c. That the teachers lower in merit have been adjusted at the schools nearest to their homes. However, despite the clear vacancy at Government

Girls High School Nagrai (payeen) at a distance of 1.5 kilometers from the house of the appellant and a teacher from other Union Council i.e. from Government Girls Middle School Shamshi Khan was adjusted.

- d. That despite the clear policy of the Government that both the spouses should be posted at one and the same station or as near as possible. The husband of the appellant namely Mr. Aziz Ahmad Arabic Teacher at Government High School Sarai Bala rendered the appellant's adjustment at Government Girls Middle School Sarai Bala or Government Girls High School Nagrai (payeen). Even like other teachers the appellant could have been retained at her own school, alas the upgraded faced the appellant with difficulties at the hands of the Competent Authority, which requires the interference of this Honorable Tribunal.
- e. That the impugned order is not based on equal treatment, which is by now the cardinal principle of the law.
- f. That the appellant has not been treated in accordance with the law and has been deprived of her established rights.

It is, therefore, very respectfully prayed that on acceptance of this appeal the appellant may very kindly be adjusted either at Government Girls High Scholl Nagari (payeen) or Government Girls middle School Sarai Bala, nearest to her home station.

Any other relief deemed appropriate may also very kindly be granted.

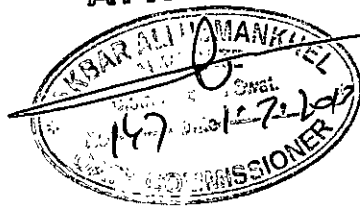
edf
Appellant Trough

Counsels,
azur
Aziz-ur-Rahman
Imdad
Imdad Ullah

Advocates Swat

Affidavit:

It is stated on Oath that all the contents of this appeal are true and correct to the best of my knowledge and belief.

ATTESTED
edf
Deponent
Mst. Sadaqat Begum


BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2013

Mst. Sadaqat Begum Arabic Teacher at Government
Girls Middle School Sarai Bala, District Dir Lower.

...Appellant

VERSUS

The Secretary Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar and Other.

...Respondents

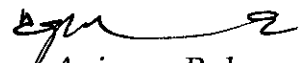
ADDRESSES OF THE PARTIES

Appellant:

Mst. Sadaqat Begum Arabic Teacher at Government
Girls Middle School Sarai Bala, District Dir Lower.

Respondents:

1. The Secretary Elementary and Secondary
Education Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary
Education Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer E & SE
Dir Lower.

Appellant through

Aziz-ur-Rahman

Advocate Swat

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2013

Mst. Sadaqat Begum Arabic Teacher at Government
Girls Middle School Sarai Bala, District Dir Lower.

...Appellant

VERSUS

The Secretary Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar and Other.

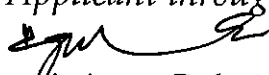
...Respondents

Application for grant of interim relief till the
disposal of the case.

Respectfully Sheweth:

- i. That the appellant has got prima facie case in her favor.
- ii. That the balance of convenience is in her favor.
- iii. That if the interim relief is not granted the appellant will suffer an irreparable loss.

It is, therefore, very respectfully prayed that on acceptance of this appeal the transfer order of the appellant may very kindly be suspended till the disposal of this appeal.

Applicant through,

Aziz-ur-Rahman

Advocate Swat

6A

Affidavit:

It is stated on Oath that all the contents of this application are true and correct to the best of knowledge and belief.

Deponent

edf
Mst. Sadaqat Begum





OFFICE OF THE
DISTRICT EDUCATION OFFICER (F)
DISTRICT DIR LOWER.

Tel: 0915-9250083
~~0915-9250082~~
0915-9250082

ANN "A"

7

Asl

A.T.C. (F)

Office Order

Consequent upon promotion of Arabic Teacher (ATs) Female B-15 to Senior Arabic Teacher B-16 on regular basis as Notified Vide Director Elementary & Secondary Education Khyber Pakhtunkhwa No. 5158-61 / File No.1/ Promotion Senior AT B-16 Dated Peshawar the 21-02-2013. The following Female ATs are hereby adjusted/ Posted in the schools mentioned against their names.

S#	Name of Teacher(SATs)	BPS	Present Station	Place Of Posting	Remarks
1	Gulstabi	16	GGHS Khazana	GGHS Khazana	Post already occupied
2	Rashida Begum	16	GGHS Osakai	GGHS Osakai	Post already occupied
3	Zeenat Begum	16	GGMS Shamsh Khan	GGHS Naqra	Vice S.No.32
4	Kousar Jehan	16	GGHS Bagh(D)	GGHS Bagh(D)	Post already occupied
5	Saidatun Nisa	16	GGMS Bandagai (T)	GGHS Tharai	Vice S.No.29
6	Naheed Begum	16	GGMS Sadbarkalay	GGHS Dantai	Vice S.No.34
7	Musarat Begum	16	GGHSS Ziarat Talash	GGHSS Ziarat Talash	Post already occupied
8	Sadaqat Begum	16	GGMS Sarai Bala	GGHS Mian Kalay	Vice S.No.30
9	Romi Bibi	16	GGHSS Chakdara	GGHSS Chakdara	Post already occupied
10	Mahar Sultan	16	GGHS Saddo	GGHS Saddo	Post already occupied
11	Balqees Rahim	16	GGMS Khungai	GGHS Timergara	Vice S.No.35
12	Gulzar Begum	16	GGHS Khanpur	GGHS Khanpur	Post already occupied
13	Nasreen Begum	16	GGCMS Timergara	GGCMS Timergara	Post already occupied
14	Azra Bibi	16	GGMS Mina Ouch	GGHSS Ouch	Vice S.No.33
15	Nasima Begum	16	GGMS Bajowro	GGHS Haji Abad	Vice S.No.36
16	Samina Naz	16	GGMS Adam Dhari	GGHS Shawa	Vice S.No.31
17	Marhaba	16	GGMS Kotkai(M)	GGHSS Kumbar	AV Post
18	Nomana Bibi	16	GGHS Rani	GGHS Rani	Post already occupied
19	Shabina	16	GGHS Manyal	GGHS Manyal	Post already occupied
20	Shazia Begum	16	GGHS Khall	GGHS Khall	Post already occupied
21	Uzma Bibi	16	GGMS Khall Kolony	GGHSS Rabat	Vice S.No.28
22	Shafaat	16	GGMS Mandish	GGHS Munjai	Vice S.No.37
23	Fatma Jabeen	16	GGHS Kityari	GGHS Kityari	Post already occupied
24	Jamila Parveen	16	GGMS Shalfalam	GGHS Odigram	Vice S.No.38

og with

0346-9386793
ATA Copy 2011

INVESTMENT STATE
and P. D. D. of Govt.
Peshawar.

Min

Attested
Adv

16	45	Samina Naz	GGMS	20/11/2011	110
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26	Taiba Mahmood	16	GGMS Shabai	GGMS Koto	Vice S.No.39
26	Shafaqat Rahim*	16	GGMS Toomang	GGMS Dishgram	AV Post
27	Sadia Bibi	16	GGMS Asburn	GGMS Asburn	Post already occupied

Consequential Posting:

S#	Name of Teacher(SATs)	BPS	Present Station	Place Of Posting	Remarks
28	Saba Ikram	15	GGHSS Rabat	GGMS Khal Colony	Vice S.No. 21
29	Hadia Begum	15	GGHS Thrai	GGMS Bandagui	Vice S.No. 5
30	Shahna Ghani	15	GGHS Mian Kaly	GGMS Sarai Bala	Vice S.No.8
31	Rukhsana Begum	15	GGHS Shawa	GGMS Adam Dhari	Vice S.No.16
32	Hunara Ayaz	15	GGHS Nagrai (P)	GGMS Shamela Khan	Vice S.No.3
33	Abida Begum	15	GGHSS Ouch	GGMS Mina Ouch	Vice S.No.14
34	Abida Noureen	15	GGHS Dantai	GGMS Sadbar Kaly	Vice S.No.6
35	Musarrat Shaheen	15	GGHS Timergara	GGMS Khungai	Vice S.No.11
36	Sama Begum	15	GGHS Haji Abad	GGMS Bajawro	Vice S.No.15
37	Parveen Rasol	15	GGHS Munjai	GGMS Mandish	Vice S.No.22
38	Fouzia	15	GGHS Odigram	GGMS Shalfalam	Vice S.No.24
39	Nafis Bala	15	GGHS Koto	GGMS Shabai	Vice S.No.25

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his/her performance is found unsatisfactory during probationary period. In case of misconduct, he/she shall be proceeded 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. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in light of this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
7. No TA/DA is allowed for joining his/her duty

Muhammad Muttahir
District Education Officer
(F) District Dir Lower.

Endst: No. 5031-35 /Dated Timergara the 2/3 /2013.

Copy forwarded for information and necessary action to the:-

1. District Account Officer District Dir Lower.
2. All the Principals/ Head Mistresses concerned.
3. PA to the Director E&SE Khyber4 Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. M/ File.

Handwritten notes and stamps at the bottom left of the page.

Signature of Muhammad Muttahir
District Education Officer
(F) District Dir Lower.

Handwritten signature and initials at the bottom right of the page.

CHARGE REPORT

Consequent upon my promotion to the post of Senior A.T BPS -16 by the Director
Elementary and Secondary Education Khyber Pakhton Khwa. at Peshawar vide Endst. No.
538-64/411/11/12 Promotion Senior A.T B-16 Dated Peshawar the 21/02/2013.
Miss Sadiaqat Begum Senior A.T BPS -16 resumed the charge of my duties as
Senior A.T BPS-16 today on 21/02/2013 A Noon at GGHS Mian Kalay Dir Lower under
protest as my departmental appeal against the above mentioned transfer / adjustment order of
D.O/Dir at Timergara is pending before the authorities to redress my grievances

Look over

edt
Sadiaqat Begum
Senior A.T BPS -16
GGHS Mian Kalay Dir Lower

NO. 12621 Dated GGHS Mian Kalay the 21 2 2013.

Copy forwarded for information and necessary action to.

- 1) District Education Officer Dir Lower. at Timergara
- 2) District Account Officer Dir Lower at Timergara
- 3) Office Copy.


J. R. Khan
Head Mistress
GGHS Mian Kalay
Dir Lower
HEAD MISTRESS
GGHS Mian Kalay
Dir Lower.

*Attested
Adu*

SERVICE CERTIFICATE

ANN "B" (10)

Certified that Mr. Aziz Ahmad S/O Fazal Raziq S.A.T
has been serving in Education Department since 03/08/1995.
and presently he is serving as S.A.T at GHSS Sarai Bala Dir Lower.


(PRINCIPAL)
GHSS SARAI BALA
DIR LOWER

عالی مرتبت جناب ڈائریکٹر صاحب محلہ ایلمنٹری اینڈ سینڈری ایجوکیشن جیٹھڑی تحصیل خواتین اور بوساٹ جناب ضلعی ناظم تعلیمات صاحب دیرپاس

مخوال! اپیل لغرض ڈر سی اور ازالہ بے العافی صادر شدہ بحق من اپیل کنندہ بوجہ

حکم نامہ نمبری SD31-35 مورخہ 2-3-2013 بسلسلہ ترقی آف BPS NO 16A

گزارش حسب ذیل یہ ہے کہ -

- ① بحوالہ حکم نامہ متذکرہ بالا من اپیل کنندہ سماہ صداقت بیگم AT 15 B گورنمنٹ گرنر مڈل سکول سرانی بالا تیرگرہ سب ڈویژن دیر لوسٹر سے گورنمنٹ گرنر ہائی سکول میان کے صدر سب ڈویژن AT 16 B میں اپ گریڈ / پروموٹ کرنے سے شدید بے العافی کی شکار ہوئی ہے۔ اور پروموٹ ہونے کا یہ محل بجائے خوشی میری لائے ناکردہ جرم سزا دینے کی مترادف ہے۔ جو ازالہ طلب ہے۔
- ② حکم نامہ متذکرہ بالا تیر بار میرٹ کے تقاضے پوری کرنے سے عاری ہے۔ کیونکہ من اپیل کنندہ میرٹ لسٹ / آرڈر میں سیریل نمبر 8 کا حاملہ ہے۔ جو کہ گھر اور سب ڈویژن سے باہر 6 کلومیٹر کی دوری پر ایڈجسٹ کی گئی ہے۔ جبکہ میرٹ لسٹ / آرڈر میں سیریل نمبر 11 کے حاملہ استانی کو قریبی سکول تیرگرہ میں ایڈجسٹ کی گئی ہے۔

③ حکم نامہ متذکرہ بالا میں من مسئلہ کی قریبی سکول BPS جیٹھڑی نگر داس میں B=15 کی اسامی موجود تھی۔ جو کہ من اپیل کنندہ سے $\frac{1}{2}$ کلومیٹر کے فاصلے پر لیٹن میرٹ کے تقاضوں کو باعمال کر کے دوسری جگہ میں واقع گرنر مڈل سکول شمشلی خان سے استانی کو ایڈجسٹ کی گئی۔ جو کہ مسئلہ کیساتھ سراسر ظلم اور نا انصافی ہے۔ کیونکہ مسئلہ کو قصداً محداً حقانی سکول کو حیر لیٹن سب ڈویژن سے Dislocate کرنا سازش اور بددیہتی سے حالی نہیں۔

④ حکم نامہ مذکورہ بالا میں میرٹ حق میں Spouse policy کو بے رحمی سے نظر انداز کیا گیا کیونکہ حکم کو علم تھا۔ کہ میرٹ شوہر جسکی عمر نرنگہ AT موضوع سرانی داس جو کہ ہائی سکول سرانی بالا میں تعینات ہے۔ لیٹن من اپیل کنندہ کو جان بوجھ کر Spouse policy میں دی گئی سہولیات سے محروم رکھا ایک ظالمانہ فعل ہے۔

⑤ جناب والا جب کہ میرٹ شوہر جسکی عمر نرنگہ AT BPS سرانی بالا Spouse policy کا نام لیتا ہے۔ تو حکام بالا کہتے ہیں کہ ہم Spouse policy پر عمل کرتے اسکو کبھی وہاں لینی گھر 6 کلومیٹر دور من اپیل کنندہ کے قریب و جوار میں Transfer کر رہے ہیں۔

Attested by Addo

6) متذکرہ بالا حکم نامہ مہری باہر پسند ناپسند اور استیاری بالیسی کو مد نظر رکھا گیا ہے۔ کیونکہ اپیل کنندہ کی قحافی اور قریبی سکول نگر یا سٹین میں ایڈجسٹ شدہ استانی جو کہ شمشئی خان سے تعلق رکھتی ہے باآسانی اور قریبی گرنز ہائی سکول سدو میں ایڈجسٹ کی جاسکتی تھی۔ کیونکہ ایڈجسٹ شدہ استانی کو گرنز ہائی سکول سدو نزدیک جبکہ گرنز ہائی سکول نگر یا سٹین دور ہے۔ لیکن پسندو ناپسند کی نیا پر سدو گرنز ہائی سکول میں تعینات 15 سیٹیں کی استانی کو یوسیدہ رکھا گیا ہے۔ اور ابھی تک یوسیدہ رکھنے کی کوشش کی جارہی ہے۔ اور یہ بیانہ بنایا گیا ہے۔ کہ بیان ایک استانی تھی جو کہ B=16 کو پروموٹ ہو چکی ہے۔ لیکن اسی شکل میں AT کا دوسرا یوسٹ بھی ہے۔ جس میں ابھی بھی B=15 کی استانی کام کر رہی ہے۔

7) متذکرہ حکم نامہ میں حجم غیر محورت ذات سمجھ کر 66 کلومیٹر دوری کے فاصلے پر قبائلی علاقہ باجوڑ سے طلحہ بدامن اور غیر محفوظ علاقہ لین میاں تلی میں ایڈجسٹ کر کے حجم ملازمت سے دستبردار ہونے کی سازش کی گئی ہے۔ حالانکہ حیرت کے تقاضوں کے پیش نظر من اپیل کنندہ کو نگر یا سٹین اور نگر یا سٹین میں موجود استانی کو سدو میں ایڈجسٹ کی جاسکتی تھی اور اب بھی سو سکتی ہے۔ لیکن ہند لار عناد کا وہ ہے ایسا نہ ہو سکا۔

8) من اپیل کنندہ عزیز خاندان سے تعلق رکھتی ہے۔ اور شدید بیماری اور تقرائش میں مبتلا ہے۔ حکمہ بود الٹری کاغذات بھی پیش لائے ہیں۔ قریبی سکول اور غیر انسانی حالت میں کام لینے کے حجم مزید بیماری سے مبتلا ہونے کی سازش کی گئی ہے۔

9) من اپیل کنندہ کے جھوٹے جھوٹے حجم میں سب بڑا بچہ پنجم میں پڑھ رہا ہے۔ ان بچوں کو تسلیم دور رکھنے کی بھی کوشش کی گئی ہے۔ کیونکہ من اپیل کنندہ رات میں اٹھ کر وہاں اپنی 66 کلومیٹر دور جانے کی کوشش کرتی ہے۔ اور وہاں بھی رات کو سوتی ہے۔ تو اس کی بچوں کی زندگی کو بھی اجیران بنائی گئی ہے۔

ضابطہ والا! درج بالا حقائق پر مبنی وجوہات و مشکلات کو مد نظر رکھتے از روٹ الفاف مہری اپیل ہذا کو منظور فرمائے گئے ہیں قحافی گرنز ہائی سکول نگر یا سٹین میں ایڈجسٹ کی جائے۔

عین نوازش ہوگی۔ - مورخ 5/3/2013

ایکٹا بلوچار اپیل کنندہ سماءہ صلاحیت سیم AT کے سرکاری بالا اندر ٹرانسفر دیئے جانے سے متعلق

Attested
Adm

بعد التخصیہ سروس میں سہ ماہیہ کی طرف سے

قیمت ایک روپیہ	کورٹ فیس
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مورخہ 28 جون 2013ء منجانب سہ ماہیہ
 مقدمہ حمادہ صہدات بیگم بنام حکومت سندھ
 دعوی جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاہر و انصاف
 متعلقہ آن مقام جیکس کورنگی کیلئے / عزیز ہر اس شخص کا بعد از تصدیق اس کے
 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 و تقرر ثالث و فیصلہ پر حلف دینے جواب
 دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق ذراں پر دستخط کرنے کا اختیار ہوگا نیز بصورت
 عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ دائر کرنے اپیل نگرانی و
 نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔
 اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ
 برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے
 سبب سے ہاگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے
 وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل
 صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

المرقوم 28 جون 2013ء

السعدی گواہ شہدہ العبدہ
 بمقام جیکس کورنگی
 Attested and Accepted by
 [Signature]

کے بعد از تصدیق اس کے

خدمت ضابطہ صیر میں سرپرست بیورو خیر النجون فراہم کیے گئے ہیں۔

Put up with
Early Hearing درخواست برائے

سنگھ سکرٹری ایجوکیشن وغیرہ

Handwritten signature and scribbles.

7/13/13
سائلہ صائب علی عرفان ۲۔

۱) یہ سائلہ کا تبادلہ غیر قانونی طور پر سول ایڈووکیٹ نے کیا تھا۔

عدالت حضور میں۔ حوالہ 17/13 کو ایڈیشن دائر کر دی ہے۔ جس میں دو دفعہ Case

سپرٹیکٹ نہیں ہوئی اور اب 2/12 تا آخر ایسی قور کا نام

۲) سائلہ صائب علی اور ٹھکانے میں مسئلہ ہے۔ لہذا اس سے دور 26 کو مٹر جانے کا قائل

نہیں۔ لہذا سائلہ کے درخواست کو منظور کیا گیا اور ٹھکانے کو نوٹس جاری کی جانے۔

لہذا درخواست چلنے جوئے 2/2/13۔ کو ویب لایا جانے۔

سائلہ نا صیانت دعاؤں رہی ہے

فقط زیادہ آرا۔

سائلہ صرافت بتم عرف سکرٹری اور

Be fixed
at an early
available
date

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 199 /ST

Dated 07/02 /2014

To,

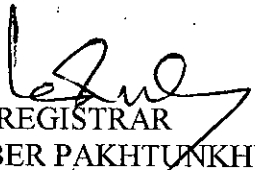
The DEO(F),
E&SE, Dir Lower.

Subject:- APPEAL NO. 1024 OF 2013 MST. SADAQAT BEGUM VS SECRETARY E&SE AND OTHERS.

I am directed to forward herewith the following order dated 03.02.2014 passed by this Tribunal on the above appeal for strict compliance.

“Counsel for the appellant and Mian Amir Qadir, GP for the respondents present. Neither representative of the respondents is present nor record is available for arguments on maintainability of the appeal. The DEO (F), E&SE, Dir Lower or representative of respondent N. 3 be summoned again with record, positively, for arguments on maintainability of the appeal at camp court Swat on 7.4.2014.”

Sd/--xx
Chairman
Camp Court Swat.

o/c

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 1503 /ST

Dated 17-10 /2014

To,

The DEO (F),
E&SE, Dir Lower.

Subject:- APPEAL NO. 1024/2013 MST. SADAQAT BEGUM VS SECRETARY
E&SE KPK PESHAWAR AND OTHERS.

I am directed to forward herewith the following order dated 13.10.2014 passed by this Tribunal on the above appeal for strict compliance.

“Counsel for the appellant (Mr. Imdadullah, Adv.) and Mr. Muhammad Zubair, Sr. GP for the respondents present. Neither representative of the respondents is present nor the requisite sanction/order has been provided so far. Therefore, the DEO (F) E&SE, Dir Lower (respondent No. 3) be summoned in person alongwith the requisite sanction/order for further proceedings at camp court Swat on 01.12.2014.”

Sd/--xx
Chairman
Camp Court Swat

dc

[Signature]
REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DIR LOWER AT TIMERGARA.

OFFICE ORDER.

Mst: Sadaqat Begum SAT B-16 GGHS Mian Kalay is hereby transferred to GGHS Nagri (P) against vacant post of SAT on her own pay and grade in the interest of public service with immediate effect.

Note:

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

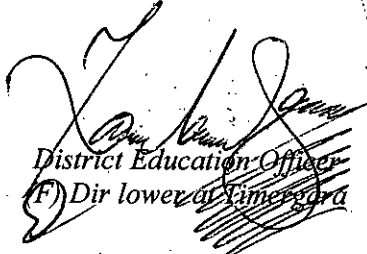
(ZAIBUN NISA)
District Education Officer
(F) Dir lower at Timergara

Endst: No. 3734-36 /

Dated Timergara the 6 / 11 / 2014.

Copy of the above is forwarded for information to: -

- 1) The District Accounts Officer Dir lower at Timergara.
- 2) The Head Mistresses concerned.
- 3) The Teacher Concerned.


District Education Officer
(F) Dir lower at Timergara

0-40
02.02.14