

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
AT CAMP COURT ABBOTTABAD

SERVICE APPEAL NO. 563/2013

Date of institution ... 25.03.2013
Date of judgment ... 18.03.2019

Mst. Ismat Begum Daughter of Ajoon Khan
R/o Dharyal, Tehsil and District Mansehra.

... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education Khyber Pakhtunkhwa Peshawar.
2. Director Education (Elementary & Secondary Education), Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) (E&SE) Mansehra.
4. Deputy District Officer (Female) (E&SE) Mansehra.
5. District Education Officer, (Male) (E&SE) Mansehra.

... (Respondents)

APPEAL AGAINST THE ORDER OF RESPONDENTS NO. 3 TO 5
DATED 22.11.2008 LETTER NO. 220 DATED 09.06.2012 VIDE
WHICH APPELLANT HAS BEEN TERMINATED FROM SERVICE
UNDER THE NWFP REMOVAL FROM SERVICE (SPECIAL
POWERS) ORDINANCE 2000.

Mr. Ahmed Farooq Khan, Advocate.

.. For appellant.

Mr. Muhammad Bilal Khan, Deputy District Attorney

.. For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI

.. MEMBER (JUDICIAL)

Mr. MUHAMMAD HAMID MUGHAL

.. MEMBER (JUDICIAL)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Learned counsel for the appellant present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Muhammad Usman, Incharge Litigation for the respondents present. Arguments heard and record perused.

2. Brief facts of the case as per present service appeal are that the appellant was serving in Education Department as Primary School Teacher. She was

imposed major penalty of compulsory retirement by the competent authority vide order dated 22.11.2008 on the allegation of absence from duty. The appellant filed departmental appeal on 31.01.2012 which was rejected on 09.06.2012 hence, the present service appeal on 25.03.2013.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant was serving in Education Department. She was imposed major penalty of compulsory retirement. It was further contended that neither charge sheet, statement of allegation was framed or served upon the appellant nor proper inquiry was conducted nor any absence notice was issued to the appellant therefore, the appellant was condemned unheard and prayed for acceptance of appeal.

5. On the other hand, learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that the appellant was imposed major penalty of compulsory retirement vide order dated 22.11.2008 on the allegation of absence from duty but the appellant filed departmental appeal on 31.01.2012 after a delay of more than three years which was rejected on 09.06.2012. It was further contended that the appellant was required to file service appeal within one month after decision of departmental appeal but the appellant has filed service appeal on 25.03.2013 after a delay of more than nine months therefore, it was vehemently contended that the departmental appeal as well as service appeal are badly time barred and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant was imposed major penalty of compulsory retirement vide order dated 22.11.2008, the appellant was required to file departmental appeal within one month after passing of


W. Amin
18.3.2014

impugned order but the appellant has filed departmental appeal on 31.01.2012 after a delay of more than three years. Similarly, the record also reveals that the appellant has filed departmental appeal on 31.01.2012 which was rejected on 09.06.2012 therefore, the appellant was required to file service appeal within one month of the decision of departmental appeal but the appellant has filed service appeal on 25.03.2013 after a delay of more than nine month and no condonation of delay application has been filed by the appellant therefore, departmental appeal as well as service appeal of the appellant are badly time barred. As such, without touching the merit of the case, the present service appeal is dismissed being time barred. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
18.03.2019



(MUHAMMAD HAMID MUGHAL)
MEMBER
CAMP COURT ABBOTTABAD


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT ABBOTTABAD

Service Appeal No. 563/2013

18.03.2019

Learned counsel for the appellant present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Muhammad Usman, Incharge Litigation for the respondents present. Arguments heard and record perused.

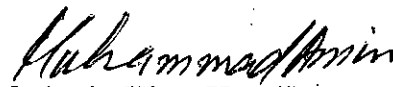
Vide our detailed judgment of today consisting of three pages placed on file, without touching the merit of the case, the present service appeal is dismissed being time barred. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

18.03.2019



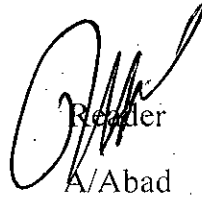
(M. Hamid Mughal)
Member
Camp Court Abbottabad



(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

15.11.2018

Husband of the appellant and Sohail Ahmad LO for the respondent present. Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 15.01.2019 at camp court Abbottabad.


Reader
A/Abad

Handwritten notes in Urdu
15.01.2019

Appellant absent. Learned counsel for the appellant absent. Mr. Muhammad Bilal learned Deputy District Attorney present. Adjourn. To come up for arguments on 17.01.2019 before D.B at camp court Abbottabad.


Member


Member

Camp Court Abbottabad

17.01.2019 Learned counsel for the appellant and Mr. Muhammad Bilal learned Deputy District Attorney present. Learned Deputy District Attorney seeks adjournment. Adjourn. To come up for arguments on 18.03.2019 before D.B at Camp Court Abbottabad.


Member


Member


Camp Court A/Abad

28.06.2018

Muhammad Tariq, husband of the appellant Mst. Ismat bagum present. Mr. Muhammad Usman, Incharge Litigation alongwith Mr. Ziaullah, Deputy District Attorney for the respondents present.

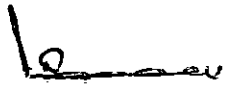
The representative again sought some time to produce original record as the same is missing and the copy of the same is also not available. Last chance be given to produce the record and give statement on yes or no about the availability of record. Case to come up for further proceedings on 27.08.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad


27-8-18.

Husband of the appellant present.
No one present for respondents,
Due to summer vacations case is
adjourned to 20-9-18 for the same
at camp court Abbottabad.


Reader

18.09.2018


Since 20th September, 2018 has been declared as public holiday on account of Moharram therefore, case is adjourned to 15.11.2018 for arguments before the D.B at camp court, Abbottabad.


Chairman
Camp court, A/Abad

19.02.2018

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney alongwith Muhammad Usman, Senior Clerk for the respondents present. The learned counsel for the appellant to the notice of this Tribunal that in the order dated 24.7.2012 there is mention of an order of 2003 and also that the order dated 22.11.2008 is an appellate order but there is no order of 2003 on record and the order order of 22.11.2008 is also not passed by the appellate authority. Departmental representative seeks adjournment to produce the order of 2003. To come up for producing such record and arguments on 18.4.2018 before the D.B at camp court A/Abad.

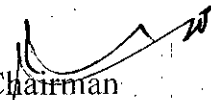

Member


Chairman
Camp court, A/Abad.

18.04.2018

Attorney for the appellant and Mr. Usman Ghani, District Attorney alongwith Muhammad Usman, Senior Clerk for the respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. To come up for record and arguments on 28.06.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad

563/2013

22.11.2017


Counsel for the appellant and Addl. AG alongwith Muhammad Usman, Senior Clerk for the respondents present. Counsel for the appellant seeks adjournment. To come up for arguments on 20.12.2017 before the D.B at camp court, Abbottabad.



Member


Chairman
Camp Court, A/Abad.

20.12.2017


Husband of the appellant on behalf of the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents also present. Husband of the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 19.02.2018 before D.B at Camp Court Abbottabad.


(Gul Zeb Khan)
Member (Executive)
Camp Court Abbottabad


(Muhammad Amin Khan Kundi)
Member (Judicial)
Camp Court Abbottabad

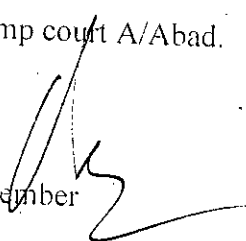
20.07.2016

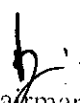
Counsel for the appellant and Mr. Muhammad Usman, Sr. Clerk alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Written reply by respondents No. 1 to 4 submitted. Learned Sr.GP relies on the same on behalf of respondent No. 5. Cost paid and receipt obtained from learned counsel for the appellant. The appeal is assigned to D.B for rejoinder and final hearing for. 16.01.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad,

16.01.2017


Agent of counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Ms. Shazia Mughal, GP for respondents present. Counsel for the appellant was stated busy before Hon'able High Court, A/Abad Bench. To come up for rejoinder and final hearing on 17.05.2017 before D.B at camp court A/Abad.


Member


Chairman
Camp court A/Abad.

25.05.2017

Since tour programme to camp court, Abbottabad for the month of May, 2017 has been cancelled by the Worthy Chairman. therefore, to come up for the same on 22-11-17 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly


Registrar

16.11.2015

Mr. Muhammad Tariq on behalf of the appellant and Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Siddique, Sr.G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 17.2.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad.


17.02.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Saddique, Sr.G.P for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments before S.B on 21.4.2016 at Camp Court A/Abad.


Chairman
Camp Court A/Abad

21.04.2015

Mr. Muhammad Tariq, husband of the appellant and Mr. Muhammad Usman, S/Clerk alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity extended subject to payment of Rs. 500/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 20.07.2016 before S.B. at Camp Court, Abbottabad.


Chairman
Camp court, A/Abad.

19.08.2015

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Tahir Aurangzeb, GP for respondents present. Learned counsel for the appellant argued that the appellant was serving as PTC when dismissed from service vide order dated 22.11.2008 on the allegations of willful absence regarding which she preferred departmental appeal on 28.07.2008 followed by Writ Petition No.357-A/2012 wherein directions were issued to the respondents for disposal of departmental appeal of the appellant within 30 days from the date of decision i.e 15.05.2012 which order was not complied with prompting the appellant to submit C.O.C Petition which was decided on 24.08.2013 followed by another Contempt application which was decided on 12.03.2013 where-after the instant service appeal was preferred on 25.03.2013 .

That the appellant has neither remained absent nor any enquiry was conducted nor show cause notice was issued and, furthermore, she was proceeded against under the provision of RSO-2000 which was repealed at the time of departmental proceedings.

Points urged need consideration. Admit, subject to all legal objections including limitation. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 16.11.2015 before S.B at camp court A/Abad.


Chairman

Camp Court Abbottabad

Appellant Deposited
Security & Process Fee



16.12.2014


No one is present on behalf of the appellant. Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. The Tribunal is incomplete. To come up for preliminary hearing on the question of limitation at camp court A/Abad on 19.05.2015.



Reader

19.5.2015

Counsel for the appellant present. Submitted Wakalat Nama and requested for adjournment. To come up for preliminary hearing including point of limitation and observations recorded in order sheet dated 17.6.2014, on 18.6.2015 at camp court A/Abad.


Chairman

Camp Court A/Abad

18.6.2015

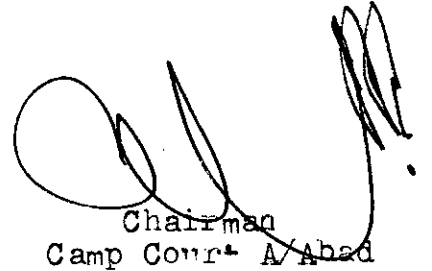
Mr. Muhammad Tariq, husband of the appellant, on behalf of the appellant present. Counsel for the appellant is not in attendance. Requested for adjournment. Adjourned to 19.8.2015 for preliminary hearing including the point of limitation before S.B at Camp Court A/Abad.


Chairman

Camp Court Abbottabad

17.2.2014

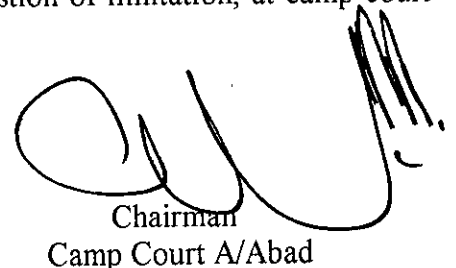
Mr. Muhammad Tariq, husband of the appellant, on behalf of the appellant present and requested for adjournment due to pre-occupation of counsel for the appellant in the High Court. To come up for preliminary hearing at camp court A/Abad on 17.6.2014.



Chairman
Camp Court A/Abad

17.6.2014

Counsel for the appellant present and heard. The record would reveal that order of the competent authority of which the appellant is actually aggrieved was made on 22.11.2008, but the file contains application dated 31.01.2012 which seems to be the first application against the said order and no further departmental appeal against the order of the competent authority is available on the file. When asked about the departmental appeal, the learned counsel requested for time to produce copy of the appeal preferred by the appellant against the order dated 22.11.2008. In any case, the appeal has been lodged on 25.3.2013 against a letter to the appellant dated 9.6.2012, and, as such, question of limitation has to be dealt with at the first instance. In this connection, a pre-admission notice be issued to the DEO(M), E&SE, Mansehra (Respondent No.5) and learned G.P. for production of record of the case, particularly communication of orders made by the authorities for preliminary arguments, particularly on the question of limitation, at camp court A/Abad on 16.12.2014.



Chairman
Camp Court A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. SB3 /2013

S.No. Date of order Order or other proceedings with signature of judge or Magistrate
Proceedings

1

2

3

1

25/03/2013

The appeal of Mst. Ismat Begum presented today by Mr.Ahmad Farooq Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.


REGISTRAR

2

10.4.13


This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up there on 16.9.13


CHAIRMAN

3.

16.9.2013

Mr.Muhammed Tariq, husband of the appellant, on behalf of the appellant present and requested for adjournment due to pre-occupation of learned counsel for the appellant in the High Court. To come up for preliminary hearing at camp court A/Abad on 17.2.2014.


Chairman
Camp Court A/Abad

**BEFORE THE SERVICE TRIBUNAL,
KHYBER PAKHUTN KHWA PESHAWAR**

Appeal no 563/13

Mst. Ismat BegumAppellant

VERSUS

Government of Khyber Pakhtun Khwa through
Secretary Education Khyber Pakhtun Khwa
Peshawar and others Respondents

SERVICE APPEAL

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Dated 16.03.2013

Mst. Ismat Begum
...Appellant

Through


AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

(1)

**BEFORE THE SERVICE TRIBUNAL,
KHYBER PAKHUTN KHWA PESHAWAR**

Appeal no. 53/13

Mst. Ismat Begum daughter of Ajoon Khan resident
of Dharyal, Tehsil and District Mansehra
..... Appellant

N.W.F. PROVINCE
581
25/3/13

VERSUS

1. Government of Khyber Pakhtun Khwa through Secretary Education Khyber Pakhtun Khwa Peshawar.
2. Director Education (Elementary & Secondary Education), Khyber Pakhtun Khwa Peshawar.
3. District Education Officer (Female) (E&S) Mansehra.
4. Deputy District Officer (Female) (E&S) Mansehra.
5. District Education Officer, (Male) (E&S) Mansehra
..... Respondents.

**APPEAL AGAINST THE ORDER OF
RESPONDENTS NO.3 TO 5 DATED
22.11.2008, LETTER NO.220 DATED 9/6-2012
VIDE WHICH APPELLANT HAS BEEN
TERMINATED FROM SERVICE UNDER
THE NWFP REMOVAL FROM SERVICE
(SPECIAL POWER) ORDINANCE 2000.**

PRAYER:

By accepting this appeal, the impugned order be set aside and appellant be re-instated in service with all back benefits.

25/3/13

Respectfully Sheweth!

1. That, the appellant was appointed as PTC teacher in Education Department on 22.09.1983 vide order No.4953-57 by respondent No.1.

(Copy of the same is annexed as annexure "A").

(2)

2. That, during service appellant was awarded selection grade on 27.09.1987.

(Copy of the same is annexed as annexure "B").

3. That, during her service, she has performed her duties perfectly and she remained punctual throughout in her service career.

4. That, appellant has been transferred to GGPS Dharyal, to GGPS Dalbani circle Dhodial on 31.08.1999.

(Copy of the same is annexed as annexure "C").

5. That, GGPS Dalbani was at a distance of 25 KM from her home station and her transfer was politically motivated. Dalbani is situated in a difficult hilly area but even the appellant was performing her duties regularly.

6. That, appellant's monthly salary have been stopped illegally without any reason by the Deputy District Officer (F) verbally. No inquiry was conducted and the appellant was not afforded an opportunity to be heard.

7. That, appellant challenged the non-payment of salaries before the Honourable Service Tribunal, NWFP Peshawar. The appeal was disposed off vide order dated 09.05.2006.

(Copy of the same is annexed as annexure "D").

8. That, after the disposal of appellant's service appeal, petitioner approached the office of respondents No.3 to 5 but they did not pay and release the salary of appellant.

9. That, appellant attending the office of respondents No.2 to 5 for her grievances but respondents No.2 and 5 kept mum and

remained silent and subsequently respondents No.2 and 5 terminated the service of appellant vide letter dated 22.11.2008.

(Copy of the same is annexed as annexure "E").

10. That, appellant preferred departmental representation to respondent No.1 that appellant be treated legally according to law and no discrimination be made in case of appellant as the case of appellant from all aspect does not fall within the ambit of Ordinance 2000/E&D rule 1973 and that be withdrawn.

(Copy of departmental appeal is annexed as annexure "F").

11. That, appellant has challenged the impugned order through Writ Petition No.357-A of 2012 the same was disposed of vide order dated 15.05.2012.

(The copy of Writ Petition and order are annexed as annexure "G" & "H").

12. That, respondent No.5 did not comply with the direction of August High Court contained in order dated 15.05.2012. The appellant initiated contempt of court proceedings against the respondent No.5 who appeared in August High Court Bench Abbottabad on 04.01.2013 and submitted irrelevant papers by showing that appellant grievance has been removed.

(Copy of contempt of court application and order dated 04.01.2013 are annexed as annexure "I" & "J" respectively).

13. That, when appellant obtained the copy furnished by respondent No.5 in the court on 04.01.2013, the respondent No.5 has deceived not only the appellant but also deceived the court and appellant again filed Contempt of court petition against the respondents No.3 and 5 in the August High Court Bench Abbottabad. Respondent No.5 personally appeared and submitted letter No.220 dated 09.06.2012 alongwith inquiry report. It is very strange that in inquiry report, letter No.960-62-A/ADO dated 18.06.2012 was quoted, no copy of the so-called letter was annexed with letter No.220 dated 09.06.2012 and it was further shown that the meeting was conducted by the so-called committee on 24.07.2012, whereas the letter in the light of findings of committee was prepared on 09.06.2012, which shows that neither letter was written on 09.06.2012 nor committee meeting was held on 24.07.2012. It means that the whole proceedings are baseless actually no committee was formed and similarly no letter was scribed on 09.06.2012. It is just to escaped and save his skin from the contempt of court proceedings by respondent No.5.

(The copies of C.O.C and order of August High Court dated 12.03.2013 and letter dated 09.06.2012 and report of inquiry committee dated 24.07.2012 are annexed as annexure "K" to "N" respectively).

14. That, the appellant seeks the gracious indulgence of this Honourable Court, inter alia on the following amongst the other grounds: -

REASONS.

- i. That, the removal from service order of appellant is the result of political motivation and is based on malafide.
- ii. That, no inquiry was conducted, no show cause notice was issued.
- iii. That, prior to the compulsory retirement order/removal from service order, it was the legal duty of respondents No.2 to 5 to issue a show cause notice to the appellant and then thereafter conduct the proper inquiry issued the charge sheet but in the case of the appellant these mandatory proceedings are lacking.
- iv. That, respondents No.2 to 5 wanted to grab the salaries of appellant, so they issued the impugned illegal order.
- v. That, appellant never found guilty of misconduct, no corruption charges has ever been leveled against the appellant so the case of appellant does not fall within the ambit of compulsory retirement from service.
- vi. That, the Ordinance 2000 was a draconian law against the principles of natural justice and basic human rights, therefore it was not placed before the parliament that during the issuance of impugned order it was not at all in field.
- vii. That, instant appeal is within time as the Honourable Peshawar High Court in its judgment and order in Writ Petition No.357-A/2012 dated 15.05.2012 directed respondent No.5 that he shall decide the representation of the appellant within 30 days but respondent

(6)

No.5 submitted his reasons on 12.03.2013 first time in the Peshawar High Court in Petition No.15-A of 2013 prior to that appellant was not informed through any source regarding the reason of respondent No.5 refusing to re-instant the appellant. So the appeal in hand is well within time.

viii. That, the other grounds will be discussed at the time of hearing.

For the aforesaid grounds, therefore, it is respectfully prayed that this Honourable Court may please to issue an appropriate order: -

- i. Declaring the order made by respondents No.2, 5 and any proceedings done in consequence thereto are without lawful authority and of no legal effect, the ordinance 2000 was not in field.
- ii. To suspend the operation of impugned order, to restrain the respondents to further interfere in the official duties of appellant.
- iii. The appellant be reinstated on service with all back benefits including seniority, be paid salaries prior to 22.11.2008 and till date including her period of reinstatement.
- iv. That, ordinance 2000 be declared against the constitution of Islamic Republic of Pakistan, 1973 against basic human rights and moreover it was not in the field at the time of issuance of impugned order.

7

v. That, appellant be treated according to law and no discrimination should be done to her.

vi. Any other relief, appropriate in the circumstances of the case but not specifically asked for may also be granted to the appellant.

Dated 16.03.2013



Mst. Ismat Begum
...Appellant

Through



AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

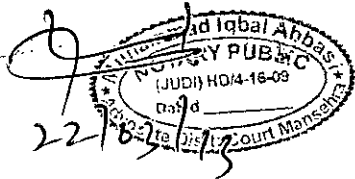
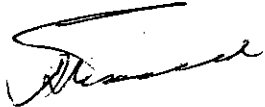
AFFIDAVIT.

I, Mst. Ismat Begum daughter of Ajoon Khan resident of Dharyal, Tehsil and District Mansehra, Appellant, do hereby solemnly affirm and declare on oath that the contents of this Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 16.03.2013



Mst. Ismat Begum
(DEPONENT)



(8)

**BEFORE THE SERVICE TRIBUNAL,
KHYBER PAKHUTN KHWA PESHAWAR**

Mst. Ismat Begum Appellant

VERSUS

Government of Khyber Pakhtun Khwa through
Secretary Education Khyber Pakhtun Khwa
Peshawar and others Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Mst. Ismat Begum daughter of Ajoon Khan resident
of Dharyal, Tehsil and District Mansehra.

RESPONDENTS

1. Government of Khyber Pakhtun Khwa through
Secretary Education Khyber Pakhtun Khwa
Peshawar.
2. Director Education (Elementary & Secondary
Education), Khyber Pakhtun Khwa Peshawar.
3. District Education Officer (Female) (E&S)
Mansehra.
4. Deputy District Officer (Female) (E&S) Mansehra.
5. District Education Officer, (Male) (E&S) Mansehra.

Dated 16.03.2013



Mst. Ismat Begum
...Appellant

Through



AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

(9)

A

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) MANSEHRA DISTRICT, MANSEHRA.

APPT./TRANSFERS/ADJUSTMENT.

OFFICE ORDER
MANSEHRA THE 22/9/83

The following Appointment/Transfers & adjustments of the JV/PTC/PT/candidates/Mistresses are hereby ordered in the interest of public service with immediate effect subject to the following conditions to be taken over charge of the posts:-

Sr. No.	Name	From	To	Remarks
1.	Mrs. Inayat Begum PTC Trained W/O Ajun Khan r/o Mirwal Medical.	Candidate.	GGPS Tsalai.	Appointed against vacant PTC post.
2.	Mrs. Arab Sultana (Mat.) D/O Mohd Saeed r/o Mansehra.	Candidate.	GGPS Moshora-Maidan.	---do---
3.	Shahida Parveen Mat. D/O Qazi Mohd Tayub r/o Dab No.1 Mansehra.	-do-	GGPS Manoo-Mara.	Against vacant post.

- NOTE: 1. Charge reports should be submitted to all concerned.
2. Newly appointed candidates are directed to produce their/her Age & Health certificates from the Medical Supdt. D.H.Q. Hospital, Mansehra before their pay etc is drawn.
3. Newly appointed candidates will get pay in MPS N. 7 i.e. (Rs. 560-23-1020 for PTC Trained candidate) and untrained will get Rs. 560/- PM fixed plus usual allowances as admissible under the rules.
4. The age of the newly appointed candidate should not exceed 25 years and/below 18 years.
5. Original Matriculation/PTC Certificate should be checked before signing of the Age & Health certificates/preparation of Service book and handing over charge by the SDEOs/Headmistress concerned.
6. Adjustment/Appointments/Transfers has been made under the all service conditions.

DIST. EDUCATION OFFICER (F)
MANSEHRA, DISTRICT, MANSEHRA.

Endst. N. 2953-57 / dated, 22/9/83

Copy to the:-

- S.D.S.O. (Female) Mansehra/Batagram.
- Schools concerned.
- Candidates/candidate concerned.
- H/M & H/T GGMS/GGPS.
- Office order file.

Govt. Girl's High School
MEDICAL

DIST. EDUCATION OFFICER (F)
MANSEHRA.

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE), MANSEHRA, DISTRICT.**

Office order
Dated Mansehra the 27.09.83

APPTT./TRANSFER/ADJUSTMENT.

The following appointment/Transfers and adjustment of the JV/PTC/PT/Candidates/Mistress are hereby ordered in the interest of public service with immediate effect after the term of their taking over charge of the posts: -

Sr. No.	Name	From	To	Remarks
1	Miss. Ismat Begum PTC Trainer do Ajun Khan r/o Girwal Dhodial	Candidate	GGPS Tambai	Appointed against vacant PTC post
2	Bibi Arab Sultana (Mst) D/o Mohd. Saeed r/o Mansehra.	Candidate	GGPS Noshera Maidan.	-do-
3	Shahida Parveen Mst. D/o Qazi Mohd. Tayub r/o Dab No. 1 Mansehra.	-do-	GGPS Manoo Mera	Against vacant post.

NOTE:

1. Charge reports should be submitted to all concerned.
2. Newly appointed candidates are directed to produce their/her age and Health certificate from the Medical Supdt.D.H.Q Hospital, Mansehra before their pay etc. is drawn.
3. Newly appointed candidates will get pay in NPS No.7 i.e. (Rs.560-23-1020 for PTC Trained Candidate) and untrained will get Rs.560/- PM plus annual allowances as admissible under the rule.
4. The age of the newly appointed candidates should not exceeds 25 years and/below 18 years.
5. Original Matriculation/PTC Certification should be checked before signing of the Age & Health. Certificates/preparation of service book and handing over charge by the SDEO's/Headmistress concerned.
6. Adjustment/Appointments/Transfers has been made under all service conditions.

DISTT: EDUCATION OFFICER (F)
Mansehra District Mansehra.

Endst. No.4953-57/dated 22.09.83

Copy to the: -

- 1.2. S.D.E.O (Female) Mansehra/Battagram.
3. Schools concerned.
4. Candidates/candidate concerned.
5. H/M & H/T GGMS/GGPS
6. Office order file.

Sd/-

DISTT: EDUCATION OFFICER (F)
Mansehra.

(11) B

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) PRIMARY MANSEHRA.

OFFICE ORDER NO _____
DATED MANSEHRA THE 22/7/93.

AWARD OF PTO/SELECTION GRADE.

The following PTO trained Mistresses of Mansehra District are hereby awarded PTO selection grade in BPS No.10(660-32-1300) and (870-42-1710) and (~~1995-60-1995~~) respectively by from the date as noted against each. 1230-79-2415

S.NO	Name of Mistress with School.	Date of Ist Apptt:	Date of passing PTC Exam:	Date of award of selection Grade.	Remarks.
1.	Shafqat Nasreen D/O Ghulam Hussain.GGPS Dab No.4	10.3.1980	30.9.79	6.1.87	-
2.	Parveen Akhtar D/O Taus Khan.GGPS Dadar.	22.4.80	24.3.75	---do---	
3.	Abida Begum D/O Mir Zaman.GGPS Bedadi	24.4.80	30.9.79	---de---	
4.	Abida Begum D/O Q.Habib ur Rehman GGPS Bejna.	28.5.80	30.9.79	---do---	
5.	Nasreen Akhtar D/O Ghulam Jelani. GGPS Gandian.	22.11.80	20.3.75	---de---	
6.	Shaheena Begum D/O Sher Zaman GGPS Mangloor.	23.11.80	30.9.79	11.1.87	
7.	Rukhsana Bibi D/O Malak Aman GGPS G.H. Ullah	17.1.81	10.9.80	---do---	
8.	Abida Parvin D/O Abdul Qayyum GGPS Doga.	1.2.81	30.9.79	---do---	
9.	Naseera Begum D/O Ghulam Nabi GGPS Jokan.	1.2.81	10.9.80	---do---	
10.	Shaheena Begum. D/O Mohd Aslam GGPS Mari Shahwali.	10.2.81	10.9.80	---de---	
11.	Jamila Khatoon. D/O Gul Zaman GGPS Giddri Taleh-Mohd Khan(Trand)	22.2.81	10.9.80	---do---	
12.	Bibi Safia D/O Fazal-Haq GGPS Nikka Pani.	20.3.73	22.3.81	4.4.87	
13.	Razia Begum D/O Mohd Ibraheem. GGPS Datta No.2	22.3.81	29.1078	1.4.87	
14.	Naghma Rehman D/O Fazal ur Rehman GGPS Jabbri.	12.4.81	10.9.80	---do---	

Continue Page-2-

15.	Niaz Gul D/O Mir Gul Shah GGPS Datta No. 2	21.6.81	10.9.80	1.4.87	-
16.	Rukhsana Begum D/O Aurang Zeb. GGPS Khaki	10.9.81	10.9.80	23.8.87	-
17.	Nighat Mahood. D/O Mohd Ashraf GGPS Giddari Essa Khan	5.10.81	30.10.81	--do--	
18.	Yasmeen Parim D/O Din Mohd GGPS Pasund.	19.5.81	10.9.80	--do--	
19.	Samina Begum D/O Taj Mohd. GGPS Torha- Bala.	23.11.81	3.10.81	--do--	
20.	Tanveer Begum. D/O Fazal ul Mahumun. GGPS Muzaffar Jia.	20.12.81	23.12.81	--do--	
21.	Hafiza Begum D/O Mohd Mahood GGPS Datta Shakral	22.12.81	23.12.81	--do--	
22.	Fozia Begum D/O GGPS Datta	23.12.81	23.12.81	--do--	
23.	Maryam Qasbiqum D/O Mohd Ashraf GGPS Datta Doshkhatta.	30.9.64	20.2.83	--do--	
24.	Bibi Shah Jehan D/O S. Rehmat Shah GGPS Baghori	19.9.65	16.3.83	--do--	
25.	Bibi Saeed. D/O Mohd Ayub Khan GGPS Baghori	27.4.67	16.3.83	--do--	
26.	Parveen Ashraf D/O Abdul Waleed. GGPS G. M. U. R. H.	6.3.69	16.3.83	--do--	
27.	Tanveer Begum D/O Qasbiqum GGPS Baghori Kaler.	5.3.68	22.3.83	--do--	
28.	Eng Niaz D/O Khan GGPS Datta Kalan	10.8.74	15.8.82	--do--	
29.	Shamida Parveen D/O Abdul Asad GGPS Datta Baghori Kalan.	6.6.83	25.9.82	--do--	
30.	Bibi Khatoon D/O Mohd Ashraf GGPS Datta Baghori Khurd	8.9.83	25.9.82	--do--	
31.	Bibi Nighat D/O Mir Aizaz Datta Baghori Khurd	10.9.83	25.9.82	--do--	
32.	Aqsa Begum D/O Mohd Ashraf GGPS Datta	18.4.83	15.9.83	--do--	
33.	Ghazala Begum D/O Ghulam Sabir GGPS Datta Datta	21.9.83	15.9.83	--do--	
34.	Firdous Shabeed. D/O Mohd Niaz GGPS Bokal	24.9.83	15.9.83	27.9.87	
35.	Aqsa Begum D/O GGPS Datta	28.9.83	30.9.79	--do--	
36.	Nahid Begum D/O Ghulam Sabir GGPS Datta	4.10.83	25.9.82	--do--	

37.	Saeeda Begum D/O Safe Ullah GGPS Sadeen.	15.10.83	15.9.83	27.9.87
38.	Rukhsana Tabassum D/O Badri Mian Ullah GGPS Sheikhdar.	22.10.83	15.9.83	---do---
39.	Farhat Naz D/O Mohd Rafiq GGPS Jokan	22.10.83	15.9.83	---do---
40.	Khalida Bibi D/O Abdul Rehman. GGPS Banda Bala.	16.4.84	10.9.80	22.2.88
41.	Shakeela Anjum D/O Mohd Yousaf GGPS Murad Pur.	16.4.84	15.9.83	---do---
42.	Hussina Farooq D/O Mian Umar Shah GGPS Debgran.	10.5.84	15.9.83	4.9.88
43.	Kousar Shaheen D/O Mohd Tehmaz GGPS Batkarar.	11.5.84	15.9.83	1.9.88
44.	Rukhsana Maqbool D/O Maqbool ur Rehman GGPS Mangloor.	12.5.84	15.9.83	---do---
45.	Musarat Begum. D/O Inayat ur Rehman GGPS Chitti Dehri.	13.5.84	15.9.83	---do---
46.	Talveer Begum D/O Essa Khan GGPS Battangi	13.5.84	15.9.83	---do---
47.	Sabia Begum D/O Muzaffar Khan GGPS Bher Kund No.1	14.5.84	15.9.83	29.9.88
48.	Bibi Asmat D/O Taj Mohd GGPS Terha Bala	16.5.84	15.9.83	---do---
49.	Nargis Bibi D/O Serfraz GGPS Mari Shahwali	16.5.84	15.9.83	---do---
50.	Bibi Rashida D/O Mohd Ayub GGPS Seri Gorla	16.5.84	1.10.83	---do---
51.	Shakeela Ayub D/O Mohd Ayub GGPS Terha Bala	12.5.84	15.9.83	---do---
52.	Shamshad Begum D/O Khaqan GGPS Nokote	11.8.84	15.9.83	---do---
53.	Sartaj Bibi D/O Asad GGPS Haroori Payeen	12.8.84	1.10.83	---do---
54.	Bibi Shezadi D/O Mian Shah GGPS Shamdara	18.7.79	30.8.84	---do---
55.	Naseeb Jan D/O Najeeb ur Rehman GGPS Banda Piran	3.8.79	30.8.84	---do---
56.	Hameeda Begum D/O Khurshaid GGPS Dadar	5.10.84	15.9.83	---do---
57.	Saeeda Begum D/O Mohd Aslam GGPS Mari Shahwali	20.10.84	30.8.84	---do---
58.	Sajida Yasmeen D/O	23.10.84	15.9.83	---do---

(14) B

49.	Shakeela Bano D/O Mian Mohbat Khan GGPS Sheikh Abad.	17.4.84	30.8.84	29.9.88
50.	Rashida Parvin D/O Mohd Afzal Khan GGPS Terha Sala	27.10.84	30.8.84	--do--
51.	Fehmida Ayub D/O Mohd Ayub GGPS Deval	27.10.84	30.8.84	--do--
52.	Bibi Tehzeem D/O Fazal Elahi. GGPS Fareeda Abad.	1.11.84	30.8.84	--do--
53.	Shabnam Naz D/O Aurang Zeb GGPS Battagram	7.11.84	30.8.84	--do--
54.	Farzana Gul D/O Khalil ur Rehman GGPS Dehran	11.11.84	31.5.84	5.12.88
55.	Sajida Begum D/O Abdul Rehman GGPS Nanohu Khurd	14.11.84	30.8.84	--do--
56.	Ulfat Ara D/O Muzaffar Khan GGPS Shinkhari	14.11.84	30.8.84	--do--
57.	Bibi Tabassum D/O Ghulam Mohd GGPS Shinkhari	14.11.84	30.8.84	--do--
58.	Farhat Afzal D/O Mohd Afzal GGPS Lohar Banda	14.11.84	30.8.84	--do--
59.	Bibi Shakira D/O Fazal ur Rehman GGPS Eid Gah	2.12.84	30.8.84	26.8.89
70.	Bibi Hafiza D/O Qudrat Ullah GGPS Koteballah	4.12.84	30.8.84	--do--
71.	Nusrat Naheed D/O GGPS Pano Dehri	10.12.84	30.8.84	--do--
72.	Bibi Yasmeen D/O Ghulam Mayudin GGPS Kotli Payeen.	20.1.85	30.8.84	7.1.90
73.	Sajida D/O Q.Abdul Waheed GGPS Sher Garh	11.3.85	30.8.84	--do--
74.	Noheeda Begum D/O Abdul Ghani GGPS Sakindera	11.3.85	30.8.84	--do--
75.	Bibi Abida D/O Mohd Adrees GGPS Mera Jia	18.3.85	15.9.83	--do--
76.	Raheela Malik D/O Malak Ghulam Mohudin. GGPS Arab Khan	20.3.85	30.8.84	--do--
77.	Bibi Fukraj D/O Mohd Nazir GGPS Brat	10.4.85	15.9.83	--do--
78.	Shaheena Gul D/O Ghulam Sarwar GGPS Sajawal Sherif	17.4.85	30.8.84	--do--
79.	Bibi Rashida D/O Mohd Adrees GGPS Chakya	6.5.85	30.8.84	--do--
80.	Razwana Bibi D/O Molvi Wali Ahmad GGPS Mundhar	20.5.80	20.5.85	--do--
81.	Nayar Sultana D/O Manzoor Hussan GGPS Mansehra	1.8.84	20.10.85	--do--

82.	Parvin Tabassum D/O Kala Khan GGPS Phagla.	13.4.85	20.5.85	7.1.90	-
83.	Farhat Afzal D/O Ali Ghoar GGPS Gidder Pur	6.7.85	30.8.84	---	do---
84.	Shakeela Begum D/O Mohd Rafiq GGPS Johar, Banda	9.7.85	30.8.84	---	do---
85.	Azra Parvin D/O Mian M. habat Gul GGPS Debgan	9.7.85	20.5.85	---	do---
86.	Nasim Akhtar D/O Ghulam Rubani GGPS Oghi	13.7.85	30.8.84	25.9.90	
87.	Bushra Rubani D/O Rehmat Ullah GGPS Garlat Bala	15.7.85	30.8.84	---	do---
88.	Samina Bibi D/O Mohd M. roof GGPS Dilbera	15.7.85	30.8.84	3.9.91	
89.	Nusrat Shaheen D/O Ghulam Rasool GGPS Dumkacha	17.7.85	20.5.85	---	do---
90.	Gul Feroza D/O Mohd Hussain GGPS S.N.Khan	20.7.85	16.2.85	---	do---
91.	Shafqat Bibi D/O Abdul Jabbar GGPS Khalian Harian	21.7.85	30.8.84	26.8.92	
92.	Surya Sultana D/O Mohd Zaman GGPS Timber Khela	22.7.85	16.2.85	---	do---
93.	Zakia Bano D/O Aziz ur Rehman GGPS Bedali	27.7.85	20.5.85	---	do---
94.	Ghazala Farvin D/O GGPS Noghazi	1.8.85	15.9.83	---	do---
95.	Mehmuna Musarat D/O Shafi Ullah GGPS Dangri	4.8.85	16.2.85	---	do---
96.	Bibi Sughra D/O S. Mohd Shah GGPS Susal Jangar	22.8.85	20.5.85	---	do---
97.	Bibi Asia D/O Slam Din GGPS Khakoc	24.8.85	20.8.85	---	do---
98.	Abida Parvin D/O Mohd Afzal GGPS Terha Fayeen.	27.7.85	31.8.85	---	do---
99.	Nuzhat Parvin D/O Dildar Hussain GGPS Safida	1.9.85	19.5.85	---	do---
100.	Rukhsana Begum D/O Mohd Iqbal GGPS Garlat Bala	1.9.85	20.5.85	---	do---
101.	Mahda Bibi D/O Mohd Iqbal GGPS Garlat Bala	7.9.85	30.8.84	---	do---
102.	Bibi Jamshaid D/O Dilawar Khan GGPS Baffa Kalan	14.9.85	16.2.85	---	do---
103.	Shah Gul D/O Ahmad Din GGPS Timbri	14.9.85	20.5.85	---	do---
104.	Tahmeena Tehsin D/O Mohd, Younis GGPS Baffa Kalan	19.9.85	20.5.85	---	do---
105.	Arjamand Bano D/O Shafi Ullah GGPS Hill Ket	23.9.85	20.5.85	---	do---
106.	Tilhat Aziz D/O Mohd Khan GGPS Pano Dehri	1.10.85	30.8.84	---	do---

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107.	Tahira Jabeen D/O Ghulam Masool GGPS Mansehra	2.10.35	16.2.35	26.3.92	-
108.	Bamia Nasrin D/O Munawar Shah GGPS Dadar	3.10.35	20.3.35	---	do---
109.	Syeda Majida Tabassum D/O Mohd Shah GGPS Girwal	15.10.35	20.5.35	---	do---
110.	Reeh Afza D/O Kala Khan GGPS Sajawal Sherif	7.4.86	7.1.86	---	do---
111.	Ishrat Nasreen D/O Mehboob ur Rehman GGPS Gouter	13.5.86	16.2.85	---	do---
112.	Nayer Sultana D/O Khawaja Fazal Elahi GGPS Sandasar.	27.5.86	14.5.86	---	do---
113.	Shamas Parvin D/O Ali Asghar GGPS Chitti Dehri.	16.4.78	14.5.86	---	do---
114.	Nargis Mehboob D/O Hussain Khan GGPS Girwal	3.12.73	14.5.86	---	do---
115.	Khalida Nasrin D/O Mohd Ayaz GGPS Arabkhan	19.2.79	14.5.86	---	do---
116.	Mehar Afzoon D/O Abdul- Rehman GGPS Battagram	5.3.79	14.5.86	---	do---
117.	Rukhsana D/O Mohd Aslam GGPS Battagram.	20.7.86	31.5.86	---	do---
118.	Farhat Jabeen D/O Hafiz ur Rehman GGPS Hassari	11.4.79	14.5.86	---	do---
119.	Safia Sultana D/O Fazal ur Rehman GGPS Brat	14.4.79	14.5.86	---	do---
120.	Parvin Akhtar D/O Umar- Khatab GGPS Sabir Shah	11.4.79	14.5.86	---	do---
121.	Shehnaz Begum D/O Ghulam Nabi GGPS Chitta- Batta.	11.6.79	14.5.86	---	do---
122.	Shahida Parvin D/O Mohd Yousaf GGPS Malkan	4.9.86	31.5.86	---	do---
123.	Saeeda Begum D/O Mohd Shafi GGPS Thathi Ahmad Khan	13.11.79	14.5.86	---	do---
124.	Balqis Begum D/O Sultan Mohd GGPS Tilhatta	14.11.79	14.5.86	---	do---
125.	Zaitoon Bibi D/O Qasim Ullah GGPS Darband.	24.11.79	14.5.86	---	do---
126.	Tasleem Bibi D/O Abdul Rehman GGPS Mera Babral	3.5.81	14.5.86	---	do---
127.	Naheed Begum D/O Habib ur Rehman GGPS Banda Piran	1.10.81	14.5.86	---	do---
128.	Gul Nasrin D/O Ghulam Sarwar GGPS Bali Mang.	1.10.79	14.5.86	---	do---
129.	Shahida Parvin D/O Irshad Khan GGPS Behali	29.4.80	31.5.86	---	do---

130.	Rakhshanda Bibi D/O Mohd Ayub Khan GGPS Suchon Kalan	20.7.81	31.5.86	26.8.92
131.	Naheed Akhtar D/O Ghulam Jelani GGPS S.Mazullah	2.11.81	31.5.86	---do---
132.	Bibi Roubina D/O M.Ycunis GGPS Chountian.	11.10.86	31.5.86	---do---
133.	Shameem Akhtar D/O Mohd Ayub GGPS Jaba.	4.9.82	31.5.86	---do---
134.	Bibi Rakhshanda D/O Mohd Bashir GGPS M.A.Ali	21.9.83	31.5.86	---do---
135.	Nargis D/O Khani Zaman. GGPS Bagwai	22.9.83	31.5.86	---do---
136.	Razia Sultana D/ Malak Aman GGPS Baffa Kalan	17.11.83	31.5.86	---do---
127.	Ghazala Shaheen D/O Nahbat Shah GGPS B.Gram	1.9.86	31.5.86	---do---
138.	Ravia Naheed D/O Mohd Ashraf GGPS Mundhar	29.10.84	31.5.86	---do---
139.	Waqarun-Nissa D/O Meiz Mohd GGPS Lissan Nawab	16.2.79	34.7.86	---do---
140.	Tanveer Akhtar D/O Mohd Ayub GGPS Nakote.	22.2.79	14.7.86	---do---
141.	Abida Khatoon D/O Abdul Waiyyum GGPS Khushala	8.9.79	14.7.86	---do---
142.	Zahida Parvin D/O Murang Zeb GGPS Shahelia	16.2.79	14.7.86	---do---
143.	Rashida Begum D/O Dest Mohd GGPS Nari Pattang	25.9.80	14.7.86	---do---
144.	Shahida Sultana D/O Mohd Sultan GGPS Chowki	1.1.82	14.7.86	---do---
145.	Naheed Aslam D/O Mohd Aslam GGPS Phullra	2.1.84	14.7.86	---do---
146.	Mussarat Begum D/O Gul Zaman GGPS, Dhangri.	4.8.85	16.2.85do....

1. Necessary entry to this effect should be made in their Service Books.
2. An undertaking in the prescribed form below should be obtained from the above name of PTC's and posted in their service books duly attested by their respective Head of Institutions/offices before the drawl of payment of arrears/pay.
3. The teacher those were entitled for the award of S/Grade and have not awarded (If any) have a right for appeal and there appeal should reach in this office through proper channel duly supported by documentary proof alongwith S/Books and photo copy of appointment order in a month after issue of this award.
4. In complete and after expiry of stipulated period appeal will not be entertained.

UNDERTAKING

I _____ PTC GGMS/GGPS hereby given an undertaking to the effect that if any over payment made to me as a result of incorrect award of selection grade and detached later on, it will be made good by recovery from my/pension/gratuity as may be fixed by the Govt./Deptt:

Signature of PTC's _____

ATTESTED

5. Arrears due to the award of selection grade from the dates mentioned against each should be drawn and disbursed to them

(18) C

C

OFFICE OF THE DEPT. OF EDUCATION (FEMALE) HANSAHRA
RAJASTHAN

The following P.T.C./I.T. teachers are hereby transferred on their own pay & grade in the interest of public service with immediate effect:-

S.No.	Name of Teacher	From	To	Remarks
1)	Bilqis Begum	Govt. Nokote	Govt. Dharyal	Vice No. 2
2)	"	" Dharyal	" Balbani	" No. 7
3)	"	" Balbani	" Bhatra	" No. 4
4)	"	" Bhatra	" Nokote	" No. 1
5)	"	" Dharyal	" Dharyal	" No. 6
6)	"	" Dharyal	" Balbani	" No. 5
7)	"	" Balbani	" Nokote	" No. 1
8)	"	" Harori Payeen	" Kotli Payeen	" Vice No. 9
9)	"	" Kotli Payeen	" Harori Payeen	" Vice No. 8
10)	"	" Bellian	" Trangri Sala	" Vice No. 11
11)	"	" Trangri Sala	" Bellian	" Vice No. 10
12)	"	" Karan Syedian	" Tanwal Banda	" Vice No. 13
13)	"	" Tanwal Banda	" Karan Syedian	" Vice No. 12
14)	"	" Tanwal Banda	" Bafra Khurd	" Vice No. 15
15)	"	" Bafra Khurd	" Tanwal Banda	" Vice No. 14

- 1) Charge reports should be submitted to all concerned.
- 2) No. 15/14 is allowed.

(Signature)
Sub Divisional Education Officer (Female) Hansahra.

2230-80

Dated 21-8/98

- 1) Copy forwarded for information to the District Education Officer (Female) Hansahra.
- 2) ACCOUNT OFFICER.
- 3) Headteacher concerned.

(Signature)
Sub Divisional Education Officer (Female) Hansahra.

20-(E)

(20) C

**OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA.**

TRANSFER/ADJUSTMENT.

The following PTC/PT teachers are hereby transferred on their own pay & grade in the interest of public service with immediate effect: -

<i>Sr. No.</i>	<i>Name of Teacher</i>	<i>From</i>	<i>To</i>	<i>Remarks</i>
1	Bilqis Begum PTC	GGPS Nokote	GGPS Dharyal	Vice No. 2
2	Asmat	GGPS Dharyal	GGPS Dalbani	Vice No. 7
3	-----	GGPS	GGPS	Vice No. 4
4	-----	GGPS	GGPS	Vice No. 5
5	Riffat Shaheen	GGPS Dhodial	DDPS Daryal	Vice No. 6
6	Shahnaz	Daryal	GGPS Dalbani	Vice No. 3
7	Nusrat	Dalbani	GGPS Nokote	Vice No. 1
8	Gul Bibi	Harori Paeen	GGPS Kotli Payeen	Vice No. 9
9	Farkhanda Kiran	Kotli Payeen	GGPS Harori Paeen	Vice No. 8
10	Zakia Bibi	Bellian	GGPS Trangri Bala	Vice No. 11
11	Safia Bibi	Trangri Bala	GGPS Bellian	Vice No. 10
12	Zubaida Khatoon	Banda Syedan	GGPS Tanwal Banda	Vice No. 13
13	Nizakat Bibi	Tanwal Banda	GGPS Karka Syoian	Vice No. 12
14	Nusrat	Inayat Abad	GGPS Baffa Khurd	Vice No. 15
15	Riffat Ara	Baffa Khurd	GGPS Inayat Abad	Vice No. 14

Note: -

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

Sd/-

(PARVEEN AKHTAR)
Sub Divisional Education
Officer (Female) Mansehra

No 2235-50 dated 31.08.1999

Copy forwarded for information to the

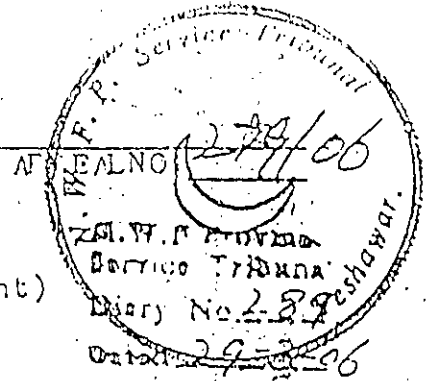
1. District Education Officer (Female), Mansehra.
2. Account Branch
3. Headmaster concerned.

Sd/-

SUB DIVISIONAL EDUCATION,
Officer (Female) Mansehra.

(21) "D"

BEFORE THE SERVICE TRIBUNAL NWFP PESHAWAR.



Mst Ismat Begum Teacher GGPS Dalbandi,
C/O Headmistress Govt. High School 9040
Shergar (Manshra) (Appellant)

V E R S U S.

- 1) Secretary Education School & Literacy Peshawar. (Respondent 1)
- 2) Executive District Officer S.L Manshra
- 3) Deputy District Officer (Female) Manshra

APPEAL AGAINST THE NON PAYMENT OF SALARY FOR THE PERIOD OCT 99
TO DEC99 (3 months) Jan 2000 to July 2000 (7 months) Sep 2000 to
Dec. 2000 (4 months) Jan: 2001 to July 2001 (7 months) June 2003 to
Aug. 2003 (3 months) Oct 2003 to up till Now.

2.

9.5.2006

Counsel for the appellant present. Heard & record perused.

This appeal is against non-payment of salaries for the period from Oct.99 to Dec.99 (3 months), Jan: 2000 to July, 2000 (7 months), Sept. 2000 to Dec. 2000 (4 months), Jan: 2001 to July, 2001 (7 months), June 2003 to Aug. 2003 (3 months) and Oct. 2003 upto now.

The appellant it appears, is serving as PTC teacher in the respondent department. Departmental proceedings have also been initiated against her. There is nothing on record regarding the outcome of the said proceedings. The appellant applied for leave on medical grounds, but there is no sanction order of the same on record. If the appellant is still in service and has served

ATTESTED
EXAMINER
S.F.P. Service Tribunal
Peshawar

(22) D

Serial No.	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
------------	------------------------------	---

during the period in-queston, her monthly salaries should be released as detailed in the heading of appeal, otherwise not. The instant appeal stands disposed of in limine in the above terms. No order as to costs. File be consigned to the record.

ANNOUNCED
9.5.2006

Handwritten signature
(ABDUL SAETTAR KHAN)
CHAIRMAN
NWFP SERVICE TRIBUNAL
CAMP COURT ABBOTTABAD.

Date of Presentation of Applicant..... 11.5.06
 Number of Words..... 800
 Copying Fee..... 6
 Urgent..... T
 Total..... 6
 Name of Copyist..... [Signature]
 Date of Completion of Copy..... 3.6.06
 Date of Delivery of Copy..... 3.6.06

Stamp: NWFP Service Tribunal
Handwritten signature
 Peshawar.

NOTIFICATION.

Whereas the disciplinary proceedings were initiated against Mst. Asmat Parveen PTC teacher Govt. Girls Primary School Dalbani Circle Dohdial Manshehra under the provision of the removal from service.

Whereas the enquiry officer/committee, who conducted enquiry and submitted report, according to the enquiry report the charges against the accused teacher were proved and recommended for imposition of Major penalty.

Now therefore, in exercises of the powers conferred upon me being competent authority under the ordinance 2000/E & S rule 1973. I hereby order the imposition of major penalty to the extent of compulsory retirement from service to Mst. Asmat Parveen PTC Govt. Dalbani with effect from 6/2003, the date of her absence from duty.

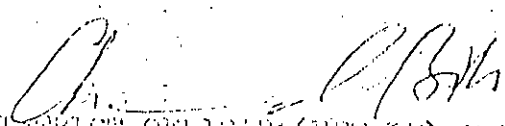
(SYED SHAH JEE)

EXECUTIVE DISTRICT OFFICER (E & S)
EDUCATION MANSHEHRA.

Headst: No. 30/87-92 Absent file/Decision dated manshehra the 22/11/08

Copy to the:-

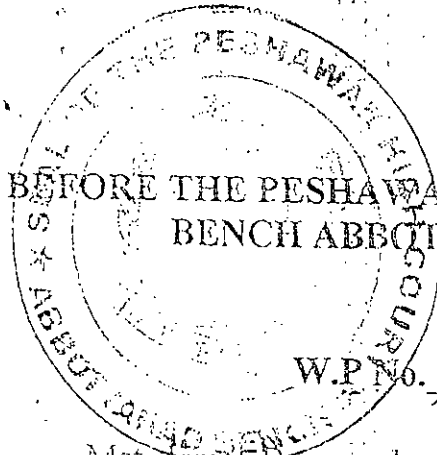
1. By: District Officer (Female) Local Office.
2. District Officer Manshehra.
3. Suptt: Local Office.
4. Teacher concerned.
5. AOC(M) Circle Dohdial.
6. Office order file.


DISTRICT OFFICER (FEMALE) E & S
EDUCATION MANSHEHRA.

DISTRICT OFFICER (MALE)
EDUCATION

(25)

"G"



BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

W.P. No. 357-A of 2012

Mst. Ismat Begum daughter of Ajoon Khan
resident of Dharyal, Tehsil and District
MansehraPetitioner

VERSUS

1. Executive District Officer (E&S) Education,
Mansehra.
2. District Education Officer (Female) E&S,
Education Mansehra.
3. Deputy District Officer Deputy District
Officer (F), Mansehra.
4. Govt. of Khyber Pakhtun Khwa through
Secretary Education, Peshawar
..... Respondents.,

WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF PAKISTAN,
1973.

Respectfully Sheweth!

1. That, the petitioner was appointed
as PTC teacher in Education
Department on 22.09.1983 vide
order No.4953-57 by respondent
No.1.

*(Copy of the same is annexed as annexure
"A").*

29/563
2-5-12

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Certified to be True Copy
2-5-12
Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 79, Act & Ordms

(2)

(26) G

2. That, during service petitioner was awarded selection - grade on 22.07.1993.

(The copy of the same is annexed as annexure "B").

3. That, during her service, she has performed her duties perfectly and she remained punctual throughout in her service career.

4. That, petitioner has been transferred to GGPS Dharyal, to GGPS Dalbani circle Dhodial on 31.08.1999.

Copy is annexed as annexure "C".

5. That, GGPS Dalbani was at a distance of 25 KM from her home station and her transfer was politically motivated. Dalbani is situated in a difficult hilly area but even the petitioner was performing her duties regularly.

6. That, petitioner's monthly salary have been stopped illegally without any reason by the Deputy District Officer (F) verbally. No inquiry was conducted and the petitioner was

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Additional Registrar
Peshawa High Court
Abbottabad Bench

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24.5.12
Examiner
Peshawa High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordns

not afforded an opportunity to be heard.

- 7. That, petitioner challenged the non-payment of salaries before the Honourable Service Tribunal, NWFP Peshawar. The appeal was disposed off vide order dated 09.05.2006.

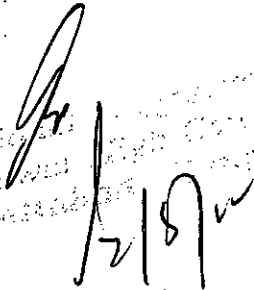
Copy of the same is annexed as annexure "D".

- 8. That, after the disposal of petitioner's service appeal, petitioner approached the office of respondents No.1 and 2 but they did not pay the salaries of petitioner.

- 9. That, petitioner attending the office of respondents No.1 and 3 for her grievances but respondents No.1 and 3 kept mum and remained silent and subsequently respondents No.1 and 2 terminated the services of petitioner vide letter dated 22.11.2008.

Copy of the same is annexed as annexure "E".

- 10. That, petitioner preferred departmental representation to respondents No.1 that petitioner be treated legally according to law and


 Additional Information
 Peshawar
 12/1/09

Certified to be True Copy
 21-5-12
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 5 of the Ordinance

4,

“(6) (29)”

no discrimination be made in case of petitioner as the case of petitioner from all aspect does not fall within the ambit of Ordinance 2000/E&D rule 1973 and that be withdrawn.

REASONS

- i. That, the removal from service order of petitioner is the result of political motivation and is based on malafide.
- ii. That, no inquiry was conducted, no show cause notice was issued.
- iii. That, prior to the compulsory retirement order/removal from service order, it was the legal duty of respondents No.1 to 3 to issue a show cause notice to the petitioner and then thereafter conduct the proper inquiry issued the charge sheet but in the case of the petitioner these mandatory proceedings are lacking.
- iv. That, respondents No.1 to 3 wanted to grab the salaries of petitioner, so

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22.5.12
Examiner

Peshawar High Court
Abbottabad Bench

Authorized Under Sec. 75 Acts Ordns

12/5/12

5,

(29) "G" ~~29~~

they issued the impugned illegal order.

- v. That, petitioner never found guilty of misconduct, no corruption charges has ever been levelled against the petitioner so the case of petitioner does not fall within the ambit of compulsory retirement from service.
- vi. That, the Ordinance 2000 was a draconian law against the principles of natural justice and basic human rights. *Therefore it was not placed before the Parliament. That during the issuance of impugned order it was not a law.*
- vii. That, other grounds will be discussed at the time of hearing.

For the aforesaid reasons, therefore, it is respectfully prayed that this Honourable Court may please to issue an appropriate writ: -

- a. Declaring the order made by respondents No.1 and 2 and any proceedings done in consequence thereto are without lawful authority and of no legal effect. *The ordinance 2000 was not in field*
- b. To suspend the operation of impugned order, to restrain the respondents to further interfere in the official duties of petitioner.

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21.5.12
Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Section 62 of Ordinance

(6)

(30)-G-~~14~~

- c. The petitioner be reinstated on service with all back benefits including seniority, be paid salaries prior to 22.11.2008 and till date including her period of reinstatement.
- d. That, Ordinance 2000 be declared against the constitution of Islamic Republic of Pakistan 1973, against basic human rights *to mention it was not in the field at the time of issuance of un-purged order.*
- e. That, petitioner be treated according to law and no discrimination should be done to her.
- f. Any other relief, appropriate in the circumstances of the case but not specifically asked for may also be granted to the petitioner.

Dated 26.04.2012

Ismt
Mst. Ismat Begum
... Petitioner

Through *[Signature]*

AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

Certified to be True Copy

51.6.12
[Signature]
Reshawa High Court
Abbottabad Bench
Authorized Under Section 75 Acts Ordms

[Handwritten Signature]

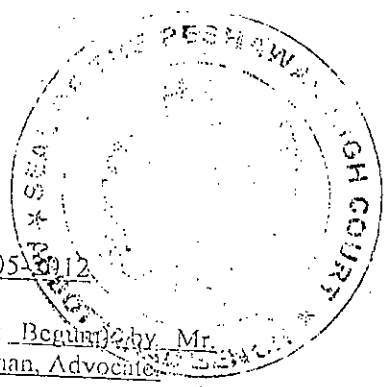
JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH.

JUDICIAL DEPARTMENT

W.P.No:357-A of 2012

JUDGMENT



Date of hearing 15-05-2012

Appellant(s)/Petitioner (s) (Mst. Ismat Begum) by Mr. Ahmad Farooq Khan, Advocate

Respondent (s) E, Do and others

YAHYA AFRIDI:-J:- Mst. Ismat Begum

petitioner seeks the constitutional jurisdiction of this Court praying for that;

"It is respectfully prayed that this Honourable Court may please to issue an appropriate writ:-

- a. Declaring the order made by respondents No.1 and 2 and any proceedings done in consequence thereto are without lawful authority and of no legal effect and the Ordinance of 2000 was not in field;
- b. To suspend the operation of impugned order, to restrain the respondents to further interfere in the official duties of petitioner;
- c. The petitioner be reinstated on service with all back benefits including seniority, be paid

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Registrar
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 25 A of Ordinance

salaries prior to 22.11.2008 and till date including her period of reinstatement;

d. That Ordinance 2000 be declared against the constitution of Islamic Republic of Pakistan 1973, against basic human rights and moreover it was not in the field at the time of issuance of impugned order;

e. That petitioner be treated according to law and no discrimination should be done to her;

f. Any other relief, appropriate in the circumstances of the case but not specifically asked for may also be granted to the petitioner."

2. In essence, the grievance of the petitioner is that she has been illegally removed from service vide the impugned order and she be reinstated in service with all back benefits.

3. The record would reveal that petitioner has already filed representation dated 28.07.2008 before respondent No.1, Executive District Officer (S&I), Manshra. The said representation still awaits outcome and passing any finding on the matter by this Court would surely prejudice the case of the petitioner before the competent authority.

Certified to be True Copy
21.5.12
Peshawar Bench
Abbottabad Bench
Authorized Under Section 23 of Ordinance

4. AAG present in Court, in a different matter, accepted notice of this petition.

5. Accordingly, in the peculiar circumstances of the present case, we direct respondent No.1 to decide the said representation within a period of 30 days, if not earlier, from the date of receipt of this order. In case, the grievance of the petitioner cannot be positively considered, he be provided reasons in writing for the same.

6. This petition is disposed of in the above terms.

SO : YAKHYA AFRIDI

SO : RITAJID MEHMOOD

CO YES

Certified to be True Copy
15.05.12
Peshawar Court
Abbottabad Bench
Announced:
15.05.2012
/MSA/

(34)

"1"

(3)

BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

Mst. Ismat BegumPetitioner

VERSUS

Executive District Officer (E&S) Education,
Mansehra Respondent

CONTEMPT OF COURT PETITION
AGAINST THE RESPONDENT BY NOT
IMPLEMENTING THE ORDER OF
THIS HONOURABLE AUGUST COURT
ISSUED IN CASE WRIT PETITION
NO.357-A OF 2012 DATED 15.05.2012.

PRAYER: -

By accepting this petition, respondent be directed to implement the order of this Honourable August Court dated 15.05.2012 in letter and spirit and respondent be exemplary punished by disobeying the order of this august court.

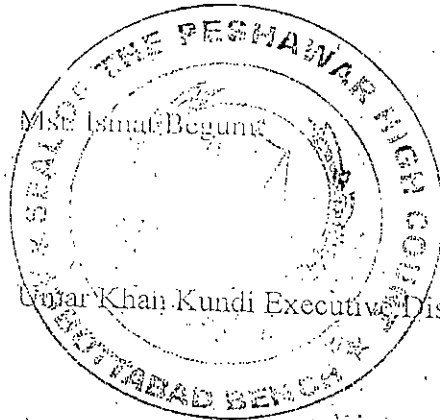
Respectfully Sheweth!

1. That, petitioner instituted a Writ Petition No.357-A in this Honourable August Court and the same was allowed vide order dated 15.05.2012.

(Attested copy of the same is annexed as annexure "A").

BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

C.O.C. NO. 01-A/13



Petitioner

Versus

Antar Khan Kundi Executive District Officer (E&S) Education, Mansehra

Respondent

CONTEMPT OF COURT PETITION
AGAINST THE RESPONDENT BY NOT
IMPLEMENTING THE ORDER OF THIS
HONOURABLE AUGUST COURT ISSUED
IN CASE WRIT PETITION NO. 357-A OF
2012 DATED 15/05/2012.

PRAYER:

By accepting this petition, respondent be directed to implement the order of this Honourable August Court dated 15/05/2012 in letter and spirit and respondent be exemplary punished by disobeying the order of this August Court.

Respectfully sheweth:

1. That, petitioner instituted a writ petition No. 357-A in this Honourable August Court and the same was allowed vide order dated 15/05/2012.

(Attested copy of the same is annexed as annexure "A").

10/06/13
FILED TODAY

Registrar
Peshawar High Court
Abbottabad Bench

Certified to be True Copy
01-01-13
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Act 1973

JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

JUDICIAL DEPARTMENT

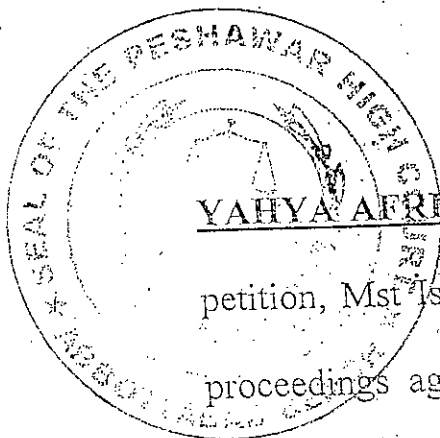
COC No: 1-A of 2013

JUDGMENT

Date of hearing..... 24-01-2013

Appellant(s)/Petitioner (s)..... Mst Ismat Begum by Ahmed Farooq / M. Adnan

Respondent (s)..... Umas Khan Khadi E.D.A. in person / Farooq



YAHYA AFRIDI :-J:

Through the instant petition, Mst Ismat Begum, has sought the contempt proceedings against the named respondent for non-compliance of orders of this Court passed in W.P No.357-A/2012 dated 15.05.2012.

2. This Court had in W.P No.357-A/2012 directed the respondent No.1, which reads that:

"Accordingly, in the peculiar circumstances of the present case, we direct respondent No.1 to decide the said representation within a period of 30 days, if not earlier, from the date of receipt of this order. In case, the grievance of the petitioner cannot be positively considered, he be provided reasons in writing for the same. This petition is disposed of in the above terms."

Certified to be True Copy

[Signature]
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordins

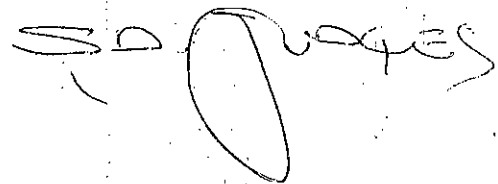
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3. Today, Umer Khan Kundi, appeared in Court in a different matter, accepts notice of the present petition. He has placed on record the relevant documents showing that the order of this Court has been complied with.

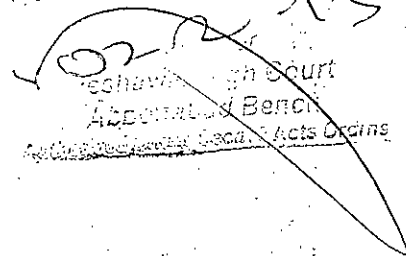
4. In view of the above, there is no need to further proceed with the present petition and the notice issued to respondent is hereby recalled.

5. The present COC is disposed of in the above terms

Announced:
24.01.2013



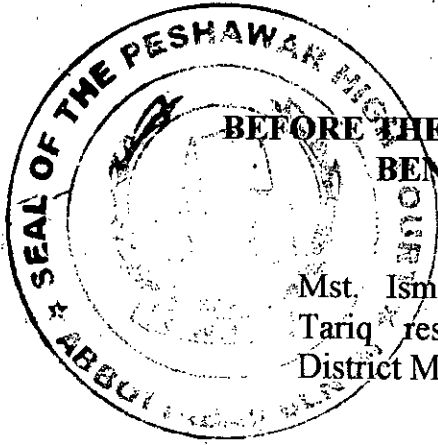
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Reshavi High Court
Appointed Bench
Acting Judge Secy. Acts Ordins

(1)

(40) "K"



**BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD**

COC. NO. 15-A/13.

Mst. Ismat Begum wife of Muhammad
Tariq resident of Dharyal, Tehsil and
District MansehraPetitioner

VERSUS

1. Umar Khan Kundi Executive District Officer (E&S) Education, Mansehra.
2. Miss Shamim Akhtar, D.E.O (Female) MansehraRespondents

CONTEMPT OF COURT PETITION
AGAINST THE RESPONDENT BY
NOT IMPLEMENTING THE ORDER
OF THIS HONOURABLE AUGUST
COURT ISSUED IN CASE WRIT
PETITION NO.357-A OF 2012 DATED
15.05.2012.

Respectfully Sheweth!

Certified to be True Copy That, the petitioner instituted a similar
 petition before this august court on
 15.12.2012.

1143/13
 Registrar
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Act of Ord 1981

(Copy of the petition is annexed as annexure "A").

2. That, respondent personally appeared before this august court on 24.01.2013 and submitted that he has complied the order of this august court.

No 658
25/1/13

(Copy of the order of this august court is annexed as annexure "B").

TODAY

Registrar
 Peshawar High Court
 Abbottabad
125/1/13

(2)

(~~41~~)

(41) "K"

3. That, respondent No.1 has misled this august court and till to date respondents did not complied the instruction passed in Writ Petition No.357-A of 2012 dated 15.05.2012.

(Copy of the Writ Petition is annexed as annexure "C").

4. That, respondents willfully disobeyed the order of this court and after a period of more than 06 months, respondent failed to comply with the order of this court.

5. That, nowadays respondent No.2 heads female section and she has also been provided the copy of this court but she has paid no heed to the order of this court.

It is, therefore, most humbly prayed that by accepting this petition, respondents be directed to implement the order of this Honourable August Court dated 15.05.2012 in letter and spirit and respondent to be exemplary punished by disobeying the order of this august court.

Dated 23.02.2013

Ismt.

Mst. Ismat Begum
.....Petitioner

Through

[Signature]

AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

Certified to be True Copy

3.13

Esat
Peshawar High Court
Abbotabad Bench
Authorized Under Sec 75 Act 1973

[Signature]
Esat
Peshawar High Court
Abbotabad Bench
Authorized Under Sec 75 Act 1973

(3)

(49) "K"

**BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD**

Mst. Ismat BegumPetitioner

VERSUS

Umar Khan Kundi Executive District
Officer (E&S) Education, Mansehra
etc.....Respondents

CONTEMPT OF COURT PETITION

AFFIDAVIT

I, Mst. Ismat Begum wife of Muhammad
Tariq resident of Dharyal, Tehsil and
District Mansehra, Petitioner, do hereby
solemnly affirm and declare on oath that the
contents of the accompanying petition are
true and correct to the best of my knowledge
and belief and nothing has been concealed
from this Honourable Court.

Dated 23.02.2013

Ismt

Identified by

Mst. Ismat Begum
(DEPONENT)

[Signature]

13503-0526005-8

703/255

255

Atty
25 Feb 13
Mst Ismat Begum w/o M Tariq
Dharyal Dush Mansehra

Certified to be True Copy
14.3.13
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 of the Ordinance

[Signature]
25/2

1 (43) "L"

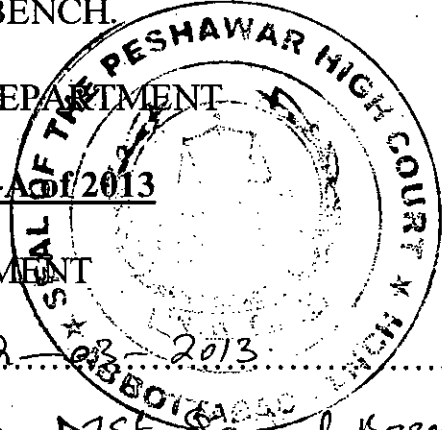
JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

JUDICIAL DEPARTMENT

COC No: 15-Ad/2013

JUDGMENT



Date of hearing..... 12-02-2013.....

Appellant(s)/Petitioner (s)..... Mst. Ismat Begum by Ahmad Perroog Khan

Respondent (s)..... Umar Khan Kundi in Person with A.A.G.

YAHYA AFRIDI, J.:- Through the instant petition, Abdul Mst. Ismat Begum, petitioner has sought the contempt proceedings against the named respondents for non-compliance of orders of this Court passed in W.P No.357-A/2012 dated 15.05.2012.

2. Mr. Umer Khan Kundi, DEO, Mansehra present in Court, at the very outset, candidly conceded that on 04.01.2012, he had placed on record the documents related to one "Mst. Asmat Yousaf", and not the petitioner, namely Mst Asmat Begum. This was unintentional and in advertent. He further stated that it was merely because of the confusion regarding the name that the said document was placed on record.

3. Today, the copy of order dated 09.06.2012 relating to the petitioner Mst. Asmat Begum is placed on record. This order was passed in compliance with the

Certified to be True Copy
1143-13
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 of the Ordinance

Q

direction rendered by this Court in W.P No.357-A/2012 dated 15.05.2012.

4. Learned counsel for petitioner stated that the petitioner has till date not received the said order and it was only today that the said order has been communicated to the petitioner.

5. In view of the above explanation rendered by Mr. Umar Khan Kundi, this Court finds that the contempt proceedings should not proceed. Accordingly, notices issued to the named respondents are hereby recalled. However, the petitioner, if aggrieved of the decision passed by the respondents should agitate the same before the competent forum.

Announced:
12.03.2013

SD. JUDGE

Certified to be True Copy
14.3.13
Peshawar High Court
Abbotabad Bench
Authorized Under Sec 75 A & 75 B Ordms

M

(45) (D)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

No. 220 /ADO/Lit: Ismat Begum PST

Dated Mansehra the 09/6 /2012

To

Mst. Ismat Begum D/O Ajuon Khan
Vill: Girwal (Dhodhial) District Mansehra.

Subject: SETTING ASIDE OF REPRESENTATION/ APPEAL IN RESPECT OF
MST. ISMAT BEGUM D/O AJOON KHAN UNDER W. PETITION
No. 357-A of 2012

In compliance with the directions of the Honorable High Court Abbottabad through its Writ Petition/Order quoted in the subject cited above, the Respondent Department, through the provision of departmental rules and regulations is, therefore, satisfied enough to inform you that you were terminated from service under the NWFP Removal from Service (Special Power) Ordinance 2000.

Against this termination, you filed departmental appeal to the competent authority, who, by the virtue of law, decided your case in favor of your compulsory retirement. While not proceeding on retirement, you filed Write Petition against the Respondent Department, which contained legal deficiency and was quite inconsistent with law that:-

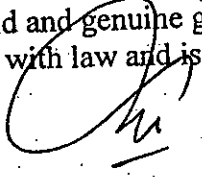
----- Respondent Department, while taking in a humane grounds of you case and giving you concession, converted you major penalty into minor one and, thus, providing you a chance of retirement.

----- You filed writ Petition against the Department by challenging the retirement order. But, besides, among others illegal and baseless grounds,

"M", (46) ②

your writ Petition in the Honourable High Court came after 375 days
which was extremely time barred and was, thus, entirely against the law.

In the prevailing of the above solid and genuine grounds, your appeal
cannot be considered feasible in accordance with law and is, therefore, liable to be
dismissed.


EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION MANSEHRA.

Endst: No. _____ /

Copy of the above is submitted to the Registrar, Honourable High Court
Bench Abbottabad with reference to judgment regarding writ petition No. No. 357-A of
2012.


EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION MANSEHRA

To

The Executive District Officer,
(E & SE) Mansehra.

Subject: ENQUIRY REPORT.

Memo:

In response to your letter # 960-62A/ADO Lit dated 18-06-2012 the committee examine the case of Mst. ASMAT BEGUM PST GGPS DALBANI.

According to service book record the teacher was removed from service in 2003 while on appeal her removal from service order was converted into compulsory retirement on 22-11-2008 w.e.f 06/2003 the date of her absence from duty.

After lapses of 04 years she challenged the impugned order vide writ petition # 375-A 2012.

The committee is of the opinion that her case for re-Instatement is badly time bard and even she failed to approach the proper forum i-e KPK Service Tribunal. However in result of her compulsory retirement she is entitled for benefits of the services rendered w.e.f her appointment.

The committee develops the consensus that she is not entitle for re-instatement and any type of back benefits w.e.f 2003 the period of her absence from duty after the lapses approximately 04 years as well as her request has no legal sanctity in the services laws.

CHAIRMAN
SHAHZADA KHAN
PRINCIPAL GCMS (BOYS) MANSEHRA

Member (1)

AZRA KHATOON
Head Mistress GGHS (Phagla) Mansehra.

Member (2)

FEHMEEDA MALIK
Head Mistress GGHS (M.M Pole) Mansehra.

24/7/2012
AZRA KHATOON
Head Mistress GGHS
Mungan Machi Pole

"N" (48)

(W)

(1) (2)

N O T I F I C A T I O N .

Whereas the disciplinary proceedings were initiated against Mst: Asmat Parveen PTC teacher Govt: Girls Primary School Dalbani Circle Dohdiel Mansehra under the provision of B.P. removal from service.

Whereas the enquiry officer/committee, who conducted enquiry and submitted report, according to the enquiry report the charges against the accused teacher were proved and recommended for imposition of Major penalty.


Now therefor, in exercises of the powers conferred upon me being competent authority under the ordinance 2000/E & S rule 1973. I hereby order the imposition of major penalty to the extent of compulsory retirement from service to Mst Asmat Parveen PTC Dalbani with effect from 1/6/2003, the date of her absence from duty.

(SYED SHAH JEE)
EXECUTIVE DISTRICT OFFICER (E & S)
EDUCATION MANSEHRA.

Encl: No. 30187-92 Absent file/Decision dated Mansehra the 22/

Copy to the:-

1. Dy: District Officer (Female) Local Office.
2. District Officer Mansehra.
3. Supdt: Local Office.
4. Teacher concerned.
5. ADO(P) Circle Dohdiel.
6. Office order file.


DISTRICT OFFICER (FEMALE) E & S
EDUCATION MANSEHRA.

DISTRICT OFFICER (MA)
ELT

کا ہر دو روز ایک بار (روزانہ) ہونی چاہئے

انعامی سکول والی کا دور

بھارت ریاست مدھیہ کے سکول والی کے

بین 15-16 کو 17 کو 18 کو 19 کو 20 کو

PTA سامان کے لئے

یہاں دو دنوں کے لئے کوٹھالیہ،

لیج دو دنوں کے لئے

لیج دو دنوں کے لئے

M. An.

A.D.O. (Insp) Mau
Primary Education Mandya

17/9/03

~~_____~~

کتابت حیات انیسویں صدی (۱۹۰۰ء تا ۱۹۱۰ء) میں لکھی گئی ہے۔
صفا نالینہ

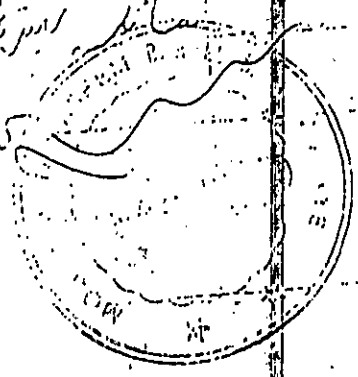
آپ اپنی ڈیوٹی سر انجام دے رہی ہیں لیکن ان کی
سہ ماہی سے مستعفی رہی تھیں اور ان کی سہ ماہی

ورزش تھی

الوئی

پیشہ نام وین : ٹرنٹیٹ سیرم انگریزی سیرول ڈائری
۱۹۰۰-۱۰-۰۳

Gen. Eliezer
E. C. F.
Mingosh 2002



۱۰ ۲۱/۱۰

گورنمنٹ جنرل کونسل سولہ سالہ لڑکوں کے لئے اسکولوں میں داخلے کیلئے

دہلی

گورنمنٹ جنرل کونسل سولہ سالہ لڑکوں کے لئے اسکولوں میں داخلے کیلئے
 دہلی میں اسکولوں کے لئے اسکولوں میں داخلے کیلئے
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العارض

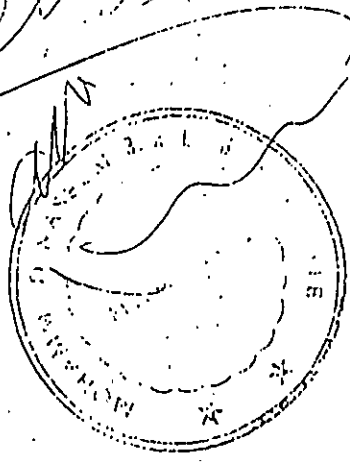
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MUHAMMAD YAQOOB
 General Councillor
 Som Elahi Mang

۱۳/۶



۱۰ ۲۱/۱۰

حاضری رپورٹ

مجموعہ انس آرڈر 50-2235 / S.No.2

بتاریخ 8-8-99 ای ایم 10 ارد دفتر 0.5 (FM) D.E

ما لکھنؤ کے تحت آج مورخہ 6/2000 کو مسماہ حضرت

بی بی بی کے گورنمنٹ ہرلہ ہر اڑی سٹول دالہی

میں حاضر ہو کر دیئے اور رپورٹ ارسال کیے

Received
Charge Report

M. Saleem Basha

مسماہ
حضرت بی بی بی
گورنمنٹ ہرلہ ہر اڑی سٹول

دالہی

Date - 1-6-2000

تاریخ آمد		دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	
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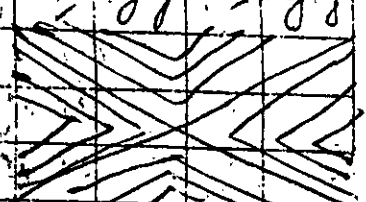
مستحق

دستخط

مستحق

تاریخ	روز	وقت	مکان	تعداد	ملاحظات	تاریخ	روز	وقت	مکان	تعداد	ملاحظات
14	شنبه	8:30	مدرسه	100	PR = PR =	14	شنبه	8:30	مدرسه	100	PR = PR =
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تاریخ و روز و وقت و مکان و تعداد و ملاحظات

رجسٹر حاضری مڈرسین گورنمنٹ کولہڈی لڈانہ پورہ اعلیٰ سکول دالپور

محمد نسیم			بابت ماہ			پہلے			دوسرے			تیسرے				
P.T.C			P.T.C			P.T.C			P.T.C			P.T.C				
تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
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میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

Miss
Dalban
S. Dalsehra

دستخط بیٹا مسٹر

منفرد پرنٹنگ پریس کراچی لاہور

(12) رجب حاضری مدراسین

نام			بابت ماہ			بابت ماہ			بابت ماہ		
عصمت بیگم			عصمت بیگم			عصمت بیگم			عصمت بیگم		
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روانگی			روانگی			روانگی			روانگی		
دستخط			دستخط			دستخط			دستخط		
آدم			آدم			آدم			آدم		
روانگی			روانگی			روانگی			روانگی		
دستخط			دستخط			دستخط			دستخط		
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ارضیت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
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albani

بہار سرگودھا میں

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جون

(5) (1) بات ماہ

گھرانہ نمبر			گھرانہ نمبر			گھرانہ نمبر			گھرانہ نمبر			گھرانہ نمبر			تاریخ
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Sunday															
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میزان	سابقہ	حالیہ	میزان	سابقہ	حالیہ	میزان	سابقہ	حالیہ	میزان	سابقہ	حالیہ	میزان	سابقہ	حالیہ

دستخط ڈاکٹر صاحب
G. G. P.
Distt. Sahiwal

مفتوحہ ہسپتال پریسنگ ہسپتال لاہور

رہنما سرکاری مدارس میں

ایست

2009

بابت ماہ

مجموعہ تدریس

مجموعہ تدریس			ایست			بابت ماہ			مجموعہ تدریس			ایست		
درست	روانگی	آمد	درست	روانگی	آمد	درست	روانگی	آمد	درست	روانگی	آمد	درست	روانگی	آمد
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	1
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	2
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	3
SUNDAY						Sunday			Sunday					
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	5
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	6
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	7
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	8
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	9
BR	=	BR	=			BP	12:30	BP	8:30					10
SUNDAY						Sunday			Sunday					
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	12
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	13
ایست														
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	15
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	16
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	17
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	18
SUNDAY						Sunday			Sunday					
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	19
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	20
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	21
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	22
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	23
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	24
SUNDAY						Sunday			Sunday					
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	26
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	27
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	28
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	29
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	30
BR	=	BR	=			BP	12:30	BP	8:30	عفت	12:30	عفت	8:30	31

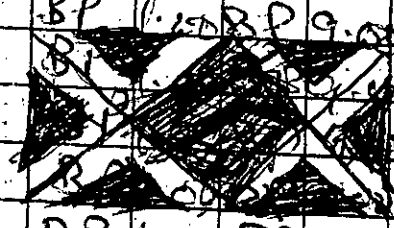
میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

Head Mistress
G. G. P. S. Dalbani
Dist. Manshera

دستخط ہیڈ ماسٹر

منصوب پرنٹنگ پریس کورپوریشن لاہور

بابت ماہ			التقویم			بابت ماہ		
تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
2	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
3	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
4	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
5	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
6	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
7	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
8	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
9	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
10	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
11	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
12	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
13	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
14	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
15	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
16	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
17	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
18	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
19	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
20	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
21	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
22	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
23	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
24	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
25	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
26	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
27	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
28	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
29	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
30	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00
31	9-00	ع	1-00	ع	BP 1.05	BP 9.00	ع	1-00



تقریر	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
تقریر									
الغایہ									
استحقاقی									
بیماری									
میزان کل									

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دستخط بیڈا مشر

مفتوحہ پرنٹنگ پریس کراچی لاہور

رجیستر حاضرین مدرسه سین

۲۰۰۲

بیت ماه در استمبیر

نام و عنوان معلم			کلاس			تاریخ آمد			روانگی			دستخط			
P.T.C			P.T.C			P.T.C			P.T.C			P.T.C			
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲	
PR	=	PR	=	PR	=	Sunday			Sunday						۳
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۴	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۵	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۶	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۷	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۸	
						BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۹	
						Sunday			Sunday						۱۰
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۱	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۲	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۳	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۴	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۵	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۶	
PR	=	PR	=	PR	=	Sunday			Sunday						۱۷
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۸	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۱۹	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۰	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۱	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۲	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۳	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۴	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۵	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۶	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۷	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۸	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۲۹	
PR	=	PR	=	PR	=	BP	1:00	BP	9:00	عفت	1-00	عفت	9-00	۳۰	

میزان	سابقه	حال	میزان	سابقه	حال	میزان	سابقه	حال	میزان	سابقه	حال	میزان	سابقه	حال

تفاتیبه
تستاتی

مخدوم احمد				بابت ماہ دسمبر				مخدوم احمد				
جو کھنڈ				لڈسٹرک راولپنڈی				جو کھنڈ				
P.T.C				P.T.C				P.T.C				
تاریخ	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی
1	Sunday			Sunday			Sunday					
2	8-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
3	8-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
4	8-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
5												
6												
7												
8												
9												
10	8-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
11	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
12	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
13	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
14	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
15	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
16	8-30	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
17	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P	9-00	گھنٹ	1-30	B.P
18	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
19	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
20	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
21	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
22	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
23	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
24	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
25	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
26	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
27	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
28	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P	8-00	گھنٹ	1-30	B.P
29												
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31												

نور محمد

Shahid

B.P 1-30 B.P 8-00

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تقریضت	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
القافیہ									
استحقاقی									
بیماری									
میزان کل									

Head S. Dohani
G.G.P.S. Dohani
نور محمد

مفتوحہ پبلک اسکول لاہور

دوره

روز

بابت ماه

مکتوب در
بیت گورزاد

بیت گورزاد

نام
عنوان

تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد
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دستخط و مهر

میزان کل	بیماری	استحقاقی	انفاقیه	تقریضت	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان

دستخط بیضا

مفتوحه برتق و بیضا

2003

بابت ماہ

نام	پ.ت.ع	پ.ت.ع	نمبر
محمد عزیز	P.T.C	P.T.C	3

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
2	Sunday		Sunday			Sunday			Sunday			Sunday
3	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
4	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
5	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
6	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
7	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00
8	Leave		BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
9	Sunday		Sunday			Sunday			Sunday			Sunday
10	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
11	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
12	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
13	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
14	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
15	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
16	Sunday		Sunday			Sunday			Sunday			Sunday
17	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
18	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
19	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
20	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
21	Leave		BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00
22	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
23	Sunday		Sunday			Sunday			Sunday			Sunday
24	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
25	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
26	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
27	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
28	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00
29	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00	8.00	محمد عزیز	BP 1.00
30	Sunday		Sunday			Sunday			Sunday			Sunday
31	Leave		BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00	8.00	محمد عزیز	BP 12.00

تسمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
افغانیہ	3	-	1	3	-	1	3	-	1	3	-	1
اتحادی												
یاری												
میزان												

Head Office
G.G. Manschayat
Dhulban

2003ء

نام	عمدہ	بابت ماہ	اپریل
محمد نسیم	چھو	پ.ت.ع	پ.ت.ع

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	
1																
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Handwritten notes in Urdu, possibly indicating a leave period or specific instructions.

Handwritten notes in Urdu, possibly indicating a leave period or specific instructions.

Sunday

Sunday

Sunday

Sunday

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
						3	1	2	4	3	1			

Head Mistress
G.G.P.S. Durbani
Distt: Magshehra

رجسٹر حاضرین مدرسین

2013ء

نئی

بابت ماہ

نام	عہدہ	لکھنؤ پور وولان	P.T.C
محمد	P.T.C	P.T.C	P.T.C

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
2	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
3	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
4	Sunday			Sunday			Sunday			Sunday		
5	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
6	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
7	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
8	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
9	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
10	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
11	Sunday			Sunday			Sunday			Sunday		
12	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
13	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
14	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
15	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
16	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
17	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
18	Sunday			Sunday			Sunday			Sunday		
19	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
20	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
21	Leave			Leave			Leave			Leave		
22	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
23	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
24	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
25	Sunday			Sunday			Sunday			Sunday		
26	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
27	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
28	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
29	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
30	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00
31	8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00	BP 8.00	B	1.00

تہہ	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفائیہ	1	4	5	3	3	6						
استحقاق												
پہلی												
میزان												

Headmaster
G.G.
District Manshera

نام	عہدہ	رہائشی پتہ	تعمیراتی پتہ

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

Headmaster
G.P.S. Dabail
Manshera

دستخط ہیڈ ماسٹر

رجسٹر حاضرین رسیدین

2008

بابت ماہ جولائی

نام	عہدہ	رہنما	مقرر

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8.00	1.00	P.R	8.00	1.00	P.P	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R
2	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R
3	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R	8.00	1.00	P.R
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قسم خدمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقیہ												
استحقاقی												
بیماری												
میزان												

Handwritten signature and text at the bottom:
 Distt. Manshehra
 دستخط ہیڈ ماسٹر

رجسٹر حاضر و غائبین

2003ء

68

نام	عورت مسلم	بابت ماہ	الست	محمد نسیم
عہدہ				جو لہار

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
1	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
2	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
3		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday
4	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
5	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
6	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
7	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
8	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
9	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
10		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday
11	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
12	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
13	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
14	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
15	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
16	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
17		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday
18		C. Leave		C. Leave		C. Leave		C. Leave		C. Leave		C. Leave
19	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
20	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
21	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
22	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
23	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
24		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday
25	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
26	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
27	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
28	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
29		C. Leave		C. Leave		C. Leave		C. Leave		C. Leave		C. Leave
30	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P	8.00	B.P
31		Sunday		Sunday		Sunday		Sunday		Sunday		Sunday

نمبر خدمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
	7	7	9	2	8	10						
اتفاقیہ												
استحقاقی												
بیماری												
میزان												

Distt: Manshera
دستخط ہیڈ ماسٹر

رجسٹر حاضرین زین / G / ی / سولہ دہائی

2003

بابت ماہ

مشرقی دہلی

صحبت سوم

نام

محمد

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	
1	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
2	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
3	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
4	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
5	8.00	J.B	12.00	J.B	8.00	B.P	12.00	B.P	8.00	J.B	12.00	J.B	8.00	P.R	1.00	P.R
6	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
7		SUNDAY				SUNDAY										
8	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
9	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
10	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
11	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
12	8.00	J.B	12.00	J.B	8.00	C. Leave	12.00	C. Leave	8.00	J.B	12.00	J.B	8.00	P.R	1.00	P.R
13	8.00	J.B	1.00	J.B	8.00	C. Leave	1.00	C. Leave	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
14		SUNDAY				SUNDAY										
15	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
16	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
17	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
18	8.00	J.B	1.00	J.B	8.00	B.P	1.00	B.P	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
19	8.00	J.B	12.00	J.B	8.00		12.00		8.00	J.B	12.00	J.B	8.00	P.R	1.00	P.R
20	8.00	J.B	1.00	J.B	8.00		1.00		8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
21		SUNDAY				SUNDAY										
22	8.00	J.B	1.00	J.B	8.00	On	1.00	On	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
23	8.00	J.B	1.00	J.B	8.00	Maternity	1.00	Maternity	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
24	8.00	J.B	1.00	J.B	8.00	Maternity	1.00	Maternity	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
25	8.00	J.B	1.00	J.B	8.00	leave	1.00	leave	8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
26	8.00	J.B	12.00	J.B	8.00	leave	12.00	leave	8.00	J.B	12.00	J.B	8.00	P.R	1.00	P.R
27	8.00	J.B	1.00	J.B	8.00		1.00		8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
28		SUNDAY				SUNDAY										
29	8.00	J.B	1.00	J.B	8.00		1.00		8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
30	8.00	J.B	1.00	J.B	8.00		1.00		8.00	J.B	1.00	J.B	8.00	P.R	1.00	P.R
31																

A.B.O. (M.S.)
 Primary Education, Manesar
 15/10/03

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
									10	9	1			

Dist: Mansarovar, Dalbari
 دستخط ہیڈ ماسٹر

رجسٹر اور مدرسین کے لئے روزانہ کی سرکاری فہرست

2003ء

بابت ماہ

نام	عہدہ	پتہ	تعلقہ
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تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
2	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
3	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
4	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
5												
6	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
7	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
8	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
9	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
10	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
11	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
12												
13	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
14	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
15	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
16	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
17	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
18	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
19												
20	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
21	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
22	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
23	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
24	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
25												
26												
27	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
28	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
29	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
30	8.00	J.B	1.00	J.B	"	P.R	"	P.R	"	"	"	P.R
31												

M. M. Mehtab Khan

Sunday

Sunday

Sunday

میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	

Headmaster
C.P.S. Dalbani
Manshra.
دستخط ہیڈ ماسٹر

بعدالت جناب

منجانب

بنام

دعویٰ یا جرم

باعث تحریر آنکہ!

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے پیروی و جواب دہی بمقام

احمد فاروق خان ایڈووکیٹ ہائی کورٹ و فیڈرل شریعت کورٹ مانسہرہ

کو بدیں شرف وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص زود وعدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ سماعت ہو یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل و نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کارروپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد ثالثی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا یکطرفہ درخواست حکم امتناعی یا فیصلہ قبل ازین ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا ایئر سٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند آ رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ..... 200

Attested & accepted

Ahmed Farooq Khan

Advocate High Court & Federal Shariat Court, Mansehra

مانسہرہ ڈسٹرکٹ ایڈووکیٹ اینڈ فیڈرل شریعت کورٹ کے وکیل اور شریعت کورٹ کے وکیل

وکالت نامہ

بعدالت جناب
 سردار سید اسد اللہ بھٹو
 جس کے وکیل ہیں بنام
 دعویٰ یا تحریر منجانب

باعث تحریر آنکہ

اندریں مقدمہ عنوان اپنی طرف سے برائے بیرونی وجوہد ہی مقام
 احمد فاروق خان ایڈووکیٹ ہائی کورٹ۔ فیڈرل شریعت کورٹ

آف پاکستان مانسہرہ

کہ بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیش پر خود یا بذریعہ اختیار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیش پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقرر اور ذات سے پہلے یا برو تعطیل بیرونی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے علاوہ کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے یا پیچھے سماعت ہونے پر منظر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار پیہ رسول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد دہائی درانی نامہ و دستبرداری و اقبال ڈگری کا اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا طرفہ درخواست حکم اقتامی یا فیصلہ قبل از ڈگری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادا جلی علیہ نقتیانہ کرنے کا مجاز ہوگا۔ اور بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل پر سز کو بجائے خود یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری نیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں۔ اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔

مجھے کل ساختہ پرداختہ موصوف شل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ منموزن
 وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ 2006ء

العبد العبد العبد

ATTESTED & ACCEPTED

AHMED FAROOQ,
 Advocate High Court,
 Mansuhra.

N.W.F.P. BAR COUNCIL

Ahmad Farooq Khan
 Advocate High Court
 N.I.C. 13503-7642445-5
 S.No. 1344

Issuing Authority

(4)

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA, PESHAWAR.

APPEAL No. 563 A/2014

Mst. Ismat Begum D/O Ajoon Khan R/O Daryal Tehsil and District
Mansehra.APPELLANT

VERSUS

1. Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. The Director Elementary & Secondary Education, Khyber Pakhtun Khawa Peshawar.
3. District Education Officer (Female) Mansehra.
4. Sub Divisional Education Officer (Female) Mansehra
.....RESPONDENTS

Written reply on behalf of the Respondent No. 1, 2, 3 & 4.

PRELIMINARY OBJECTION.

1. That the appellant has got no cause of action/locus standi to file the present appeal.
2. That the appeal is not maintainable in its present form.
3. That the appellant has not come to the Tribunal with cleans hands.
4. That the appellant is estopped by his own conduct to bring the instant appeal.
- ✓ 5. That the compulsory retirement of appellant is justifiable and lawful under the relevant sections of Removal from Service Ordinance.
6. That the appeal is groundless based on malafide attention.
7. That the appeal is barred by law of limitation.

RESPECTFULLY SHEWTH:

1. Para needs no comments. During service appellant failed to discharge her duty regularly and was proceeded departmentally.
- ✓ 2. Incorrect. Appellant was habitually irregular and was forcibly retired on the proven grounds due to frequent absence.
3. Para is incorrect. Appellant mostly and frequently remained absent from School and was, thus, proceeded in accordance with the prevailing Departmental Rules and Regulations. (Annexure A, B & C as absent reports)
4. Para is incorrect. Para also needs proof. The transfer of appellant was a normal practice, justifiable under Rule 10 as well as on the basis of service tenure.
5. Para is incorrect. Para also needs proof. According to transfer policy the posting of any Government Servant within the radius/distance of 16 kilo meters from his/her residence is held and considered home station; and there was no legal stand for the Appellant to defy the order of the Department and abstaining from joining the new station.
6. Para is incorrect. The reason of the stoppage of the pay of Appellant was perfectly justifiable as is obvious by the fact that Appellant had not been discharging her duties properly and regularly and, was, thus, liable to non-payment of salary owing to the illegal practice of numerous absences and ill-performance. The Appellant also failed to provide plausible reason of her remaining absent, despite the fact she was given full opportunities as per Annexure D & E as inquiry report and departmental order)
7. Para is incorrect. Appellant has given a false color to the order of the Honorable Service Tribunal. The appellant was not entitled salary as she was absent from duty.
8. Para is not admitted as the fact remains that Appellant was not entitled for salary for the period remaining absent from duties as at that time and as for the period brought before the Honorable Service Tribunal. As long as the Appellant remained in Appeal the Department was barred not to initiate any departmental proceedings. Hence Para not maintainable as per Annexure F order of Honorable Service Tribunal)

9. Incorrect. Appellant was habitually absent from duties and was liable to be proceeded under the relevant sections of the prevailing Service Ordinance. Departmental Appeal was, thus, liable to be set aside. As per Annexure G & H as Court Order and Departmental presentation)
10. Para No. 10 is incorrect, hence denied. As has already been explained in the foregoing Para that the service of appellant was no more required owing to the frequent violation of service rules, hence, Para is not maintainable.
11. Para needs no comments. Through the judgment of Honorable High Court Peshawar, the Appellant was required to furnish Departmental Representation.
12. Para is not admitted as the facts remain that there was confusion in form of duplication of name in the two simultaneous Writ Petitions titling Ismat Begum and Ismat Yousaf, which was the virtual outcome of placing irrelevant records before the Honorable Court as per Annexure I, the Court Order.
13. Para is incorrect. That Respondent did not suppressed any material facts as the Honorable Court was convinced and assured about an unintentional mistake which was human. It is quite irrelevant that the Respondent had deceived the Court. Moreover, the inquiry dated 24.7.2012 bears all the evidence, which was timely held. It is quite simple that departmental appeal of appellant was turn down vide letter dated 9.6.2012 and, subsequently an inquiry committee was constituted vide letter dated 18.6.2012, for re-examining of the case and finally the findings came out on 3.7.2012, which was a clear picture of highlighting the facts that the decision taken by the Department in favor of compulsory retirement of appellant was correct. (As per Court Order annexed as I)
14. Para needs no comments.

REASONS:

- i. Incorrect and needs proof. The frequent absence as well as ill performance engendered the compulsory retirement of appellant.

- ii. Incorrect. Proper procedures as well all the essential formalities have been legally adopted prior to the execution of the penalty in the light of findings and the subsequent order of the compulsory retirement of appellant.
- iii. Incorrect. The whole process of the departmental proceeding was on the record. Besides, appellant, from time to time, was conveyed through all the available sources to compliance the Departmental orders and remained dutiful, but in vain.
- iv. Incorrect. Appellant has played false and has gone far beyond the truth. Para needs proof that respondent wants to grab the salaries of appellant.
- v. In correct. Appellant is quite guilty of earning a bad name of Department by the way of regular absence, ill performance, inefficiency and producing false duty certificates (Annexed in instant Appeal at page 49 and 50), leading to compulsory retirement in accordance with all the relevant section of prevailing Service Ordinance.
- vi. Para is incorrect. Para also needs proof. The said ordinance has been in field and hence not deniable.
- vii. Para is incorrect. Para also needs proof. The matter was decided at the competent and legal forum, as the said Writ Petition was disposed off, while the departmental representation of the appellant was unworthy of credence, liable to be set aside in accordance with law.
- viii. That the Department also seeks for permission of this Honorable Court to advance other grounds at the time of arguments. That the suspension of the operation of compulsory retirement order of appellant will bring an irreparable loss to the Department hence may kindly be set aside. Besides, the appellant may kindly not be granted any relief which may go against the greater public interest.

Respondent No. 1 9/5/2016
Secretary E & S E Khyber Pakhtoon Khawa, Peshawar.

Respondent No.2
Director E & S E, Khyber Pakhtoon Khawa, Peshawar.

Respondent No. 3
District Education Officer (Female) Mansehra.


Respondent No. 4
Sub Divisional Education Officer (Female) Mansehra.

Respondent No. 5
District Education Officer (Male) Mansehra

28/4/16
Government Pleader,
District Abbottabad

AFFIDAVIT

I, District Education Officer Female Mansehra do, hereby solemnly affirm and declare that the contents of reply in the instant Appeal No. 563-A/2013, titled case Samina Begum Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Tribunal.


DEPONENT

Annexure A

قرارداد پاس نون در ایالتی مستوره از تاریخ ۲۰۰۴ بوسه نون کوه سالیانه

ردیف	موضوع	توضیحات	مستند قرارداد	تاریخ قرارداد	محل قرارداد
۱	قرارداد پاس نون	قرارداد پاس نون در ایالتی مستوره از تاریخ ۲۰۰۴ بوسه نون کوه سالیانه	قرارداد	۲۰۰۴	ایالتی مستوره

یادسورانه و متفقد لطف هر
 یون EDO حقیقی تعلیم دان
 کرانه ده خوری که دانی
 علم و انبیا استانی
 نو دگر نونی
 اثر چه بودی
 استانی
 سیرور و دقت

محمد یعقوب مریاب نے قرارداد داد لیسٹرو کی کہ بیماری سکولوں سے دفعہ اول
 کی اورت نون سے نجات دلائی جائے۔ چونکہ ہم اس سے ہرے لیسٹرو
 نون قرارداد میں کر چکے ہیں لیسٹرو کی درخواستی دینس دینی اب دینس
 فرماتے ان سکولوں سے درالقیہ استانیوں کا نام لکھ لایا جائے تاکہ کونسی
 ہر دھانے والی اورستانی سکولوں سے لکھ لیا جائے تاکہ ان کے بھی لیسٹرو
 متروک تو ان سکولوں کو اور لایا جائے تاکہ قیودت سے نکلواں تاکہ لیسٹرو
 یو اور بچیاں اپنے اپنے سکولوں میں آسکیں۔

کونسل ایجوکیشن سکولوں تعلیمی - چورتاڈہ اردل ایجنسی
 ایجنسی ایجوکیشن سکولوں تعلیمی - چورتاڈہ اردل ایجنسی
 ایجنسی ایجوکیشن سکولوں تعلیمی - چورتاڈہ اردل ایجنسی

۳۱۳ تاریخ ۱۰۴۰۲۰۰۴

Resolution passed by
 local representative of ULC
 Sum Elahi Khan against the
 absent teaching staff.

EDD حقیقی تعلیم دان
 Council's
 Al-Mura Mura hia

Annexure - B

حکومت صاب ڈی ای او (جی بی) دی ایو ایڈریس مائیکہ

صاب مائیکہ

گورنمنٹ ہائیڈرو پاور کونسل میں صاب ڈی ایو ایڈریس مائیکہ

یوں کہ صاب ڈی ایو ایڈریس مائیکہ کے دوران

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ کے تحت

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ کے تحت

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ کے تحت

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ کے تحت

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ کے تحت

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ کے تحت

العارضی

صوبہ میں صاب ڈی ایو ایڈریس مائیکہ

Head Mistress
G. G. Dalbani
Distt. ...

Absent report filed by HT
Mrs Dalbani against
the absence of Hasmat Begum

خدمت حباب اے ایس ڈی ای او صاحبہ ایلنٹری ایجوکیشن مائسٹر

حباب عالیہ - C - Annular

تصدیق کی جاتی ہے کہ عہدہ سیکرٹری جی جی ایس

دالہنی سید حاضر رہ کر اپنی ڈپوٹی سرانجام

میں دی - جس کا ثبوت ریکارڈ میں

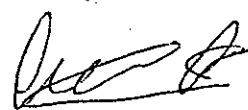
موجود ہے

مخاتب اہلیان دالبی

چوکیدار محمد نذیر ← سر فخریہ

جاوید

سر ایس



Date 01-03-2016

Statement of Attendance

Inquiry

Annexure

D

Subject: ENQUIRY REPORT.

Memo:

In response to your letter # 960-62A/ADO Lit dated 18-06-2012 the committee examine the case of Mst. ASMAT BEGUM PST GGPS DALBANI.

According to service book record the teacher was removed from service in 2003 while on appeal her removal from service order was converted into compulsory retirement on 22-11-2008 w.e.f 06/2003 the date of her absence from duty.

After lapses of 04 years she challenged the impugned order vide writ petition # 375-A 2012.

The committee is of the opinion that her case for re-Instatement is badly time bard and even she failed to approach the proper forum i-e KPK Service Tribunal. However in result of her compulsory retirement she is entitled for benefits of the services rendered w.e.f her appointment.

The committee develops the consensus that she is not entitle for re-instatement and any type of back benefits w.e.f 2003 the period of her absence from duty after the lapses approximately 04 years as well as her request has no legal sanctity in the services laws.

CHAIRMAN
SHAHZADA KHAN
PRINCIPAL GCMS (BOYS) MANSEHRA

Member (1)

AZRA KHATOON
Head Mistress GGHS (Phagla) Mansehra.

Member (2)

FEHMEEDA MALIK
Head Mistress GGHS (M.M Pole) Mansehra.

Stamp: HEAD MISTRESS G.G.H.S Mungai Machi Pole

24/7/2012

[Handwritten mark]

Departmental Proceedings

CERTIFICATE

Amesure E

Whereas the disciplinary proceedings were initiated against Mst. Asmat Parveen P.T.C teacher Govt. Girls Primary School Dalbani Circle Dohdiel Mansehra under the provision of the P, removal from service.

Whereas the enquiry officer/committee, who conducted enquiry and submitted report, according to the enquiry report the charges against the accused teacher were proved and recommended for imposition of Major penalty.


Now therefor, in exercises of the powers conferred upon me being competent authority under the ordinance 2000/E & 2 rule 1973. I hereby order the imposition of major penalty to the extent of compulsory retirement from service to Mst. Asmat Parveen P.T.C teacher Dalbani with effect from 1/6/2003, the date of her absence from duty.

(SYED SHAH JEE)
EXECUTIVE DISTRICT OFFICER (E & S)
EDUCATION MANSEHRA.

Enst: No. 30187-92 Absent file/Decision dated Mansehra the 22/

Copy to the:-

1. Dy: District Officer (Female) Local Office.
2. District Officer Mansehra.
3. Supdt. Local Office.
4. Teacher concerned.
5. ADO(F) Circle Dohdiel.
6. Office order file.


DISTRICT OFFICER (FEMALE) E & S
EDUCATION MANSEHRA.

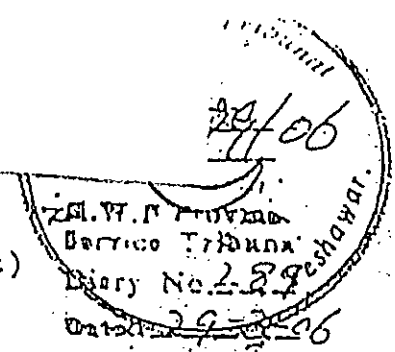
DISTRICT OFFICER (F)
E & S
MANSEHRA

B

(2)

Annexure - F

BEFORE THE SERVICE TRIBUNAL NWFP PESHAWAR.



Mrs. Ismat Begum Teacher GCPS Dalbani,
C/O Headmistress Govt. High School
Shergarh (Manshra) (Appellant)

V E R S U S.

- 1) Secretary Education School & Literacy Peshawar. (Respondent)
- 2) Executive District Officer S/L Manshra
- 3) Deputy District Officer (Female) Manshra

APPEAL AGAINST THE NON PAYMENT OF SALARY FOR THE PERIOD OCT 99 TO DEC 99 (3 months) Jan 2000 to July 2000 (7 months) Sep 2000 to Dec. 2000 (4 months) Jan: 2000 to July 2001 (7 months) June 2003 to Aug. 2003 (3 months) Oct 2003 to up till Now.

2.

9.5.2006

Counsel for the appellant present. Heard & record perused.

This appeal is against non-payment of salaries for the period from Oct. 99 to Dec. 99 (3 months), Jan: 2000 to July, 2000 (7 months), Sept. 2000 to Dec. 2000 (4 months); Jan: 2001 to July, 2001 (7 months), June 2003 to Aug. 2003 (3 months) and Oct. 2003 upto now.

The appellant it appears, is serving as PTC teacher in the respondent department. Departmental proceedings have also been initiated against her. There is nothing on record regarding the outcome of the said proceedings. The appellant applied for leave on medical grounds, but there is no sanction order of the same on record. If the appellant is still in service and has served

ATTESTED
EXAMINER
NWFP SERVICE TRIBUNAL
PESHAWAR

F

Name of Applicant or Proceedings

Order of officer proceeding with signature of judge or magistrate and that of member or council where necessary

during the period in-question, her monthly salaries should be released as detailed in the heading of appeal, otherwise not. The instant appeal stands disposed of in limine in the above terms. No order as to costs. File be consigned to the record.

ANNOUNCED

9.5.2006

Copy 5/10
(ABDUL SATTAR KHAN)
CHAIRMAN
NWFP SERVICE TRIBUNAL
CAMP COURT ABBOTTABAD.

Date of Presentation of Applicant..... *11.5.06*
Number of Words..... *200*
Copying Fee..... *6*
Urgent..... *6*
Total..... *6*
Name of Copy.....
Date of Completion of Copy..... *3.6.06*
Date of Delivery of Copy..... *3.6.06*

certified to be true copy.
[Signature]
TRANS.....
NWFP Service Tribunal
Peshawar.

Ameruse -

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JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

JUDICIAL DEPARTMENT

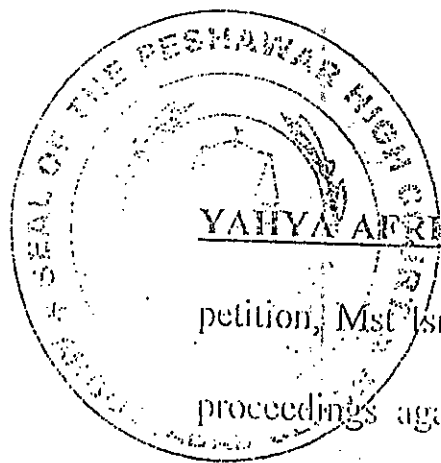
COC No: 1-A of 2013

JUDGMENT

Date of hearing..... 24-01-2013

Appellant(s)/Petitioner (s)..... Mst. Ismat Begum by Ahmed Farooq

Respondent (s)..... U-ma. Khan. Huda. E.D.O. in person



YAHYA AKRIDI :-J:

Through the instant petition, Mst Ismat Begum, has sought the contempt proceedings against the named respondent for non-compliance of orders of this Court passed in W.P No.357-A/2012 dated 15.05.2012.

2. This Court had in W.P No.357-A/2012 directed the respondent No.1, which reads that:

"Accordingly, in the peculiar circumstances of the present case, we direct respondent No.1 to decide the said representation within a period of 30 days, if not earlier, from the date of receipt of this order. In case, the grievance of the petitioner cannot be positively considered, he be provided reasons in writing for the same. This petition is disposed of in the above terms."

Certified to be True Copy

[Handwritten signature]
Court
Abbottabad Bench

[Handwritten mark]

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3. Today, Umer Khan Kundi, appeared in Court in a different matter accepts notice of the present petition. He has placed on record the relevant documents showing that the order of this Court has been complied with.

4. In view of the above, there is no need to further proceed with the present petition and the notice issued to respondent is hereby recalled.

5. The present COC is disposed of in the above terms

Announced:
24.01.2013

SD. JAGES

... the True Copy
... Court
... Bench
... Judge

9

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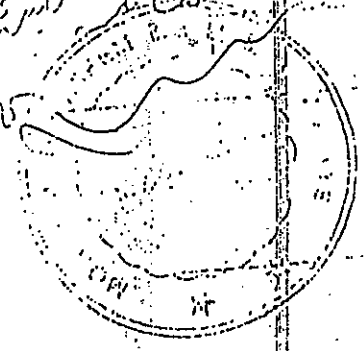
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Annexure - H

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

No. 220 /A

a PST

Dated Mansehra the

/2012

To

Mst. Ismat Begum D/O Aujoon Khan
Vill: Girwal (Dhodial) District Mansehra.

Subject: SETTING ASIDE OF REPRESENTATION/ APPEAL IN RESPECT OF
MST. ISMAT BEGUM D/O AJOON KHAN UNDER W.PETITION
No.357-A of 2011

In compliance with the directions of the Honorable High Court Abbottabad through its Writ Petition/Order quoted in the subject cited above, the Respondent Department, through the provision of departmental rules and regulations is, therefore, satisfied enough to inform you that you were terminated from service under the NWFP Removal from Service (Special Power) Ordinance 2000.

Against this termination, you filed departmental appeal to the competent authority, who, by the virtue of law, decided your case in favor of your compulsory retirement. While not proceeding on retirement, you filed Write Petition against the Respondent Department, which contained legal deficiency and was quite inconsistent with law that:-

----- Respondent Department, while taking in a human train grounds of your case and giving you concession, converted you major penalty into minor one and, thus, providing you a chance of retirement.

---- You filed writ Petition against the Department by challenging the retirement order. But, besides, among others illegal and baseless grounds,

(46) M

your writ Petition in the Honourable High Court came after 375 days
which was extremely time barred and was, thus, entirely against the law.

In the prevailing of the above solid and genuine grounds, your appeal
cannot be considered feasible in accordance with law and is, therefore, liable to be
dismissed.

EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION MANSEHRA.

Endst: No. _____

Copy of the above is submitted to the Registrar, Honourable High Court
Bench Abbottabad with reference to judgment regarding writ petition No. No. 357-A of
2012.

EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION MANSEHRA.

Annexure-I

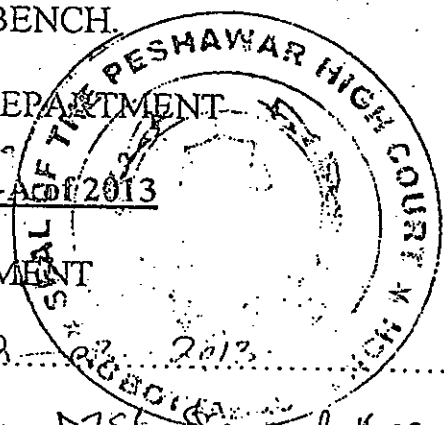
JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT, ABBOTTABAD
BENCH.

JUDICIAL DEPARTMENT

COC No: 15-ACD/2013

JUDGMENT



Date of hearing..... 13/06/2013

Appellant(s)/Petitioner (s)..... M. S. M. Begum by Ahmad Farooq

Respondent (s)..... Umar Khan Kundi in Person with A.P.C.

YAHYA AFRIDI, J:- Through the instant petition, Abdul Mst. Ismat Begum, petitioner has sought the contempt proceedings against the named respondents for non-compliance of orders of this Court passed in W.P No.357-A/2012 dated 15.05.2012.

2. Mr. Umer Khan Kundi, DEO, Mansehra present in Court, at the very outset, candidly conceded that on 04.01.2012, he had placed on record the documents related to one "Mst. Asmat Yousaf", and not the petitioner, namely Mst Asmat Begum. This was unintentional and inadvertent. He further stated that it was merely because of the confusion regarding the name that the said document was placed on record.

3. Today, the copy of order dated 09.06.2012 relating to the petitioner Mst. Asmat Begum is placed on record. This order was passed in compliance with the

Certified to be True Copy
14/06/13
Abbottabad Bench
Authorized Under Section 15 of the Courts Act, 1973

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H.

direction rendered by this Court in W.P No.357-A/2012 dated 15.05.2012.

4. Learned counsel for petitioner stated that the petitioner has till date not received the said order and it was only today that the said order has been communicated to the petitioner.

5. In view of the above explanation rendered by Mr. Umar Khan Kundi, this Court finds that the contempt proceedings should not proceed. Accordingly, notices issued to the named respondents are hereby recalled. However, the petitioner, if aggrieved of the decision passed by the respondents should agitate the same before the competent forum.

Announced:
12.03.2013

SD: JUDGE

Certified to be True Copy

14.3.13

Peshawar Court
Abbottabad Bench
Authorized Under Sec 75 A.C.S. Ordms.

18-1-2017

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

Appeal No.563-A of 2014

Mst. Ismat Begum daughter of Ajoon Khan
resident of Dharyal, Tehsil and District
MansehraAppellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through
Secretary Elementary & Secondary Education,
Peshawar.
2. The Director Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female), Mansehra.
4. Sub Divisional Education Officer (Female)
MansehraRespondents.

SERVICE APPEAL

**REJOINDER ON BEHALF OF THE
APPELLANT**

Respectfully Sheweth!

PRELIMINARY OBJECTIONS.

1. Para No.1 is incorrect.
2. Para No.2 is incorrect.
3. Para No.3 is incorrect.
4. Para No.4 is incorrect.
5. Para No.5 is incorrect.

6. Para No.6 is incorrect.
7. Para No.7 is incorrect.

FACTUAL OBJECTIONS.

1. Para No.1 of the appeal is correct and para No.1 of the reply is incorrect.
2. Para No.2 of the appeal is correct and para No.2 of the reply is incorrect.
3. Para No.3 of the appeal is correct and para No.3 of the reply is incorrect.
4. Para No.4 of the appeal is correct and para No.4 of the reply is incorrect.
5. Para No.5 of the appeal is correct and para No.5 of the reply is incorrect.
6. Para No.6 of the appeal is correct and para No.6 of the reply is incorrect.
7. Para No.7 of the appeal is correct and para No.7 of the reply is incorrect.
8. Para No.3 of the appeal is correct and para No.8 of the reply is incorrect.
9. Para No.9 of the appeal is correct and para No.9 of the reply is incorrect.
10. Para No.10 of the appeal is correct and para No.10 of the reply is incorrect.

11. Para No.11 of the appeal is correct and para No.11 of the reply is incorrect.
12. Para No.12 of the appeal is correct and para No.12 of the reply is incorrect.
13. Para No.13 of the appeal is correct and para No.13 of the reply is incorrect.
14. Para No.14 of the appeal is correct and para No.14 of the reply is incorrect.

REASONS


- i. Para No.(i) of the written reply is incorrect whereas para No.(i) of the appeal is correct.
- ii. Para No.(ii) of the written reply is incorrect whereas para No.(ii) of the appeal is correct.
- iii. Para No.(iii) of the written reply is incorrect whereas para No.(iii) of the appeal is correct.
- iv. Para No.(iv) of the written reply is incorrect whereas para No.(iv) of the appeal is correct.
- v. Para No.(v) of the written reply is incorrect whereas para No.(v) of the appeal is correct. Appellant is regularly attending the school and remained present at the school. No inquiry was

conducted so, the order for removal from service is arbitrary, illegal. No show cause notice was issued to the appellant nor any charge sheet was framed. Relevant record is annexed herewith.


- vi. Para No.(vi) of the written reply is incorrect whereas para No.(vi) of the appeal is correct.
- vii. Para No.(vii) of the written reply is incorrect whereas para No.(vii) of the appeal is correct.
- viii. Para No.(viii) of the written reply is incorrect whereas para No.(viii) of the appeal is correct.

It is, therefore, most humbly prayed that the appeal of the appellant may please be accepted.

Dated 26.07.2016


Mst. Ismat Begum
...Appellant


Through


AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

AFFIDAVIT.

I, Mst. Ismat Begum daughter of Ajoon Khan resident of Dharyal, Tehsil and District Mansehra, Appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Dated 26.07.2016


Mst. Ismat Begum
(DEPONENT)