

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 1324/2013

Date of Institution ... 29.08.2013

Date of Decision ... 01.03.2021

Mst. Noorsheed Begum (Ex-PST) D/O Gul Janoor, R/O village Tehsil
Koroona, District Karak. ... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Education Peshawar and
three others. ... (Respondents)

Present.

Mr. Hidayatullah Khattak,
Advocate.

... For appellant

Mr. Kabirullah Khattak,
Addl. Advocate General

... For respondents.

MR. HAMID FAROOQ DURRANI,
MR. ATIQR REHMAN WAZIR,

... CHAIRMAN
... MEMBER(E)

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. Instant appeal is preferred against the order dated 28.02.2013, issued by respondent No. 4, whereby, the appellant was removed from service. She is also aggrieved of order by respondent No. 3 dated 15.08.2013, through which her departmental appeal/representation was rejected.

2. As per facts noted in the memorandum of appeal, the appellant was appointed on 01.11.2009 as PST after observing all the codal requirements. She started performing duty when, on 28.02.2013, the impugned order was received by the appellant. A departmental representation was submitted before the competent authority which could not prevail and was disallowed on 15.08.2013, hence the instant appeal.

3. Learned counsel for the appellant as well as learned Addl. AG on behalf of respondents heard and available record gone through.

4. At the outset, learned Addl. AG raised a preliminary objection to the effect that the appointment of appellant was on contract basis which was never regularized. In the circumstances, this Tribunal did not have any jurisdiction to entertain the appeal.

Attending to the preliminary objection, learned counsel for the appellant contended that no doubt the appellant was appointed on 01.04.2009, on contract basis, but by operation of law her service was regularized. In that regard he referred to Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009.

5. Adverting to the merits of the case of appellant, it was contended by learned counsel that the impugned order was passed against the appellant in a slipshod manner. No opportunity of personal hearing was allowed to the appellant in her defence. Similarly, the respondents failed to hold any enquiry regarding the allegations against the appellant. The documents submitted by the appellant, at the time of applying for the post in 2009, were duly sent for verification to the concerned offices and after the needful, the salary of appellant was released and paid for about four years. Learned counsel also referred to Pay Release Order dated 24.07.2012, wherein, it was noted that consequent upon the verification of documents received from the concerned Boards/University duly verified in respect of Mst. Noorshheed Begum her pay was released w.e.f. 01.12.2010 in the best interest of public service. In support of his submissions, learned counsel relied on judgments reported as 2009 SCMR 339, 2008 SCMR 1369 and 2011 PLC (C.S) 1296.

Learned Addl. AG, speaking about merits of the case, straightaway referred to the appointment order dated 02.04.2009 and contended that the same was subject to the condition, inter-alia, that certificates/documents of appointees must be verified from the concerned authorities. If anyone found producing bogus Certificate he would be reported to the law enforcing agencies for further action and his service will be considered as automatically dismissed with no privileges of the past, if any. He further submitted that having provided bogus/fake documents, it did not lie in the mouth of appellant to agitate the question regarding non-fulfillment of procedural requirements by the respondents. The appointment of appellant was void due to act of commission on her part; therefore, the appeal did not carry any substance. In support of his arguments learned AAG referred to 2000 SCMR 777, 2019 PLC(C.S) 519, judgment of this Tribunal in Service Appeal No. 1383/2017 decided on 17.02.2020 and judgment in Service Appeal No. 72/2017 decided on 27.02.2019.

6. We have considered the arguments of learned counsel for the parties in the light of available record. It is a matter of record that the appellant was appointed as Primary School Teacher (PST) on 01.04.2009 against a contract position. By promulgation of the Act *ibid*, the service of appellant was regularized as the law provided for regularization of services of certain employees appointed on ad hoc or contract basis. The date of its publication in the official gazette was noted as 24th October, 2009, assented to by the Governor Khyber Pakhtunkhwa on 20.10.2009. It provided for regularization of services of the employees including recommendees of the High Court appointed on contract or ad hoc basis and holding that post on 31st December, 2008 or till the commencement of the Act, to be deemed to have been validly appointed on regular basis.

It requires to be noted here that the Act ibid did not require for issuance of individual notification/order separately in the cases of employees so regularized. Resultantly, we are not inclined to entertain the preliminary objection by learned AAG regarding the status of appellant.

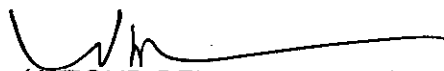
7. It is gatherable from the record that the impugned order dated 28.02.2013, was passed against the appellant and one other, on account of submission of documents which were declared fake/bogus by the concerned Board/University. Pertinently, the order was passed after about four years of issuance of the appointment order when, upon verification of the documents, payment of salary to the appellant had begun. The order itself was depictive of the fact that no enquiry or other departmental proceedings were ever undertaken against the appellant before its issuance. It is true that under condition No. 5 of the appointment, the certificates/documents were to be verified from the concerned authorities and if anyone found to have submitted a bogus/fake document, was to be dismissed. Besides, he would be prosecuted under the law. The insertion of such condition in the appointment order nowhere required that the employee(s) shall not be given any opportunity of his/her defence. Needless to note that the entitlement of every individual to fair trial/proceedings and treatment in accordance with law is constitutionally guaranteed. The respondents fell into error by non-adherence to the constitutional demand. The impugned order is liable to be set aside on that score alone.

8. We have also noticed that the respondents failed to provide even the description of documents alleged to be fake/bogus. As an eyewash, it is noted in the impugned order that the documents in respect of the appellant and one other were declared fake/bogus, the incumbents were, therefore, removed from service.

Similarly, the record is also silent regarding issuance of any show cause notice, statement of allegations or the charge sheet to the appellant before passing of impugned order. In the circumstances, we are left with no option but to hold that the departmental proceedings against the appellant were perfunctory.



9. For what has been discussed above, the appeal in hand is allowed and the appellant is reinstated into service. The respondents are, however, at liberty to conduct proper/regular enquiry against the appellant but strictly in accordance with law. The question of back benefits shall be settled in accordance with the outcome of enquiry. It is important to note that the departmental proceedings taken against the appellant shall be completed within ninety days of the receipt of copy of instant judgment. Parties are, however, left to bear their respective costs.

File be consigned to the record room.


(ATIQRUR REHMAN WAZIR)
MEMBER(E)


(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
01.03.2021

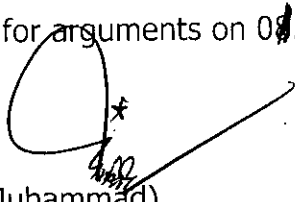
S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	01.03.2021	<p><u>Present.</u></p> <p>Mr. Hidayatullah Khattak, ... For appellant Advocate</p> <p>Mr. Kabirullah Khattak, Addl. Advocate General ... For respondents. with M. Sultan Supdt.</p> <p>Learned counsel for the appellant as well as learned Addl. Advocate General on behalf of respondents heard and available record gone through.</p> <p>Vide our detailed judgment, the appeal in hand is allowed and the appellant is reinstated into service. The respondents are, however, at liberty to conduct proper/regular enquiry against the appellant but strictly in accordance with law. The question of back benefits shall be settled in accordance with the outcome of enquiry. It is important to note that the departmental proceedings taken against the appellant shall be completed within ninety days of the receipt of copy of instant judgment. Parties are, however, left to bear their respective costs.</p> <p>File be consigned to the record room.</p> <p style="text-align: center;"> (ATIQ-UR-REHMAN WAZIR) Member(E)</p> <p style="text-align: right;"> CHAIRMAN</p> <p><u>ANNOUNCED</u> 01.03.2021</p>


13.01.2021

Counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General
alongwith Muhammad Sultan Superintendent for
respondents present.

Former requests for a short adjournment; granted. To
come up for arguments on 03.03.2021 before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

7.4.2020

Due to COVID 19, the case is adjourned
to 3.7.2020 for same as before.



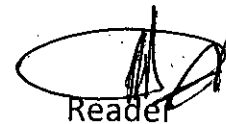
02.07.2020

Due to Covid-19, the case is adjourned. To come up for the
same on 27.08.2020 before D.B.

Reader 

27.08.2020

Due to summer vacation, the case is adjourned to
04.11.2020 for the same as before.

Reader 

04.11.2020

Junior to counsel for the appellant and Addl. AG for
the respondents present.


The Bar is observing general strike, therefore, the
matter is adjourned to 13.01.2021 for hearing before the
D.B.



(Mian Muhammad)
Member


Chairman


11.12.2019


Clerk to counsel for the appellant present. Addl: AG alongwith Mr. Umar Daraz, B&AO for respondents present. Clerk to counsel for the appellant seeks adjournment due to general strike of the Bar. Adjourned. To come up for arguments on 20.01.2020 before D.B.


Member


Member

20.01.2020 Due to general strike on the call of the Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Adjourned to 04.03.2020 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

04.03.2020

Counsel for the appellant present. Addl: AG alongwith Mr. Umer Daraz, B&AO for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 07.04.2020 before D.B.


Member


Member

23.09.2019 Due to general strike on the call of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not in attendance. Mr. Riaz Khan Paindakhel learned Assistant Advocate General for the respondents present. Adjourned. To come up for arguments on 16.10.2019 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member


16.10.2019 Counsel for the appellant present. Addl: AG alongwith Mr. Umer Daraz, B&AO for respondents present. Arguments heard. To come up for order on 31.10.2019 before D.B.

Member


Member

31.10.2019 Counsel for the appellant present. Addl: AG alongwith Mr. Umar Daraz, B&AO for respondents present. Some points need further clarification, therefore, the case is fixed for re-arguments. Adjourned. To come up for arguments on 11.12.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

17.06.2019

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant submitted an application for addition of relief, regarding back benefits, in the main service appeal. Learned Additional Advocate General seeks adjournment to furnish reply of the same. Adjourn. To come up for reply and arguments on the said application as well as arguments on the main ^{appeal} on 09.07.2019 before D.B.

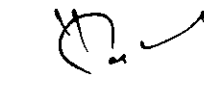

Member


Member

09.07.2019

Learned counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General present. Learned AAG seeks time to furnish reply of the application as mentioned in the preceding order sheet. Adjourn. To come up for reply and arguments on main appeal on 08.08.2019 before D.B.


Member


Member

08.08.2019

None for the appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Umar Daraz, Budget Officer for respondents present. Due to general strike on the call of Pakistan Bar council, the case is adjourned. To come up for arguments on 23.09.2019 before D.B.


Member


Member

01.02.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 11.03.2019 before D.B.


Member


Member

11.03.2019

Clerk to counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Clerk to counsel for the appellant request for adjournment as counsel for the appellant is not in attendance. Adjourn. To come up for arguments 30.04.2019 before D.B.


Member


Member

30.04.2019

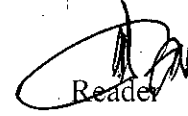
Clerk of counsel for the appellant and Mr. Kabir Ullah Khattak, Additional AG for the respondents present. Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is ill and cannot attend the Tribunal today. Adjourned to 17.06.2019 for arguments before D.B.


(AHMAD HASSAN)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

01.11.2018


Due to retirement of Hon'able Chairman, the Tribunal is defunct. Therefore, the case is adjourned for the same on 06.12.2018 before D.B.


Reader

06.12.2018


Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Neither representative of the respondents are present nor submitted record as mentioned in order sheet dated 06.12.2017. Last opportunity is given to the respondents to produce the said record on the next date of hearing, otherwise the case will be decided on the available record. Adjourned. To come up for such record and arguments on 18.12.2018 before D.B.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

18.12.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Eid-ur-Rehman, Superintendent for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 01.02.2019 before D.B.


(Hussain Shah)
Member


(Muhammad Amin Khan Kundi)
Member

20.04.2018

Counsel for the appellant and Addl:AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 05.07.2018 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

05.07.2018

None present on behalf of the appellant. Mr. Ziaullah, Deputy District Attorney for the respondents present. Similar nature appeal is fixed on 24.07.2018 therefore, the present appeal is also fixed for the same date i.e. 24.07.2018 for arguments before D.B.

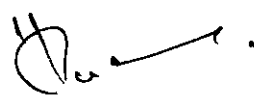

(Ahmad Hassan)
Member


(Muhammad Amin Kundi)
Member

24.07.2018

Clerk to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Clerk to counsel for the appellant seeks adjournment as learned counsel for the appellant is not in attendance. Adjourned. To come up for arguments on 17.09.2018 before D.B.



Member


Member

17.09.2018


Clerk to counsel for the appellant and Mr. Muhammad Jan Learned DDA, for the respondent present. Due to General Strike of the Bar, arguments could not be heard. To come up for arguments on 01.11.2018 before D.B.



(Hussain Shah)
Member


(Muhammad Amin Kundi)
Member

06.12.2017

Counsel for the appellant present. Mr. Muhammad Jan, Deputy District Attorney alongwith Mr. Hameed ur Rehman, AD (Lit) for respondent also present. Learned counsel for the appellant contended that the appellant was removed from service on the allegation of bogus documents/certificate. It was further contended that the documents ^{ere} was verified by the department concerned board/university and vide letter no. 266-68/File-PST dated B.D. Shah 27.07.2012 the pay of the appellant was released by the competent authority on the basis of verification report. Therefore, the representative of the department present in the court is directed to bring the said letter and other relevant record on the next date. Adjourned. To come up for such record and arguments on 23.01.2018 before the D.B.

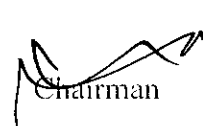

(Ahmad Hassan)
Member (E)


(Muhammad Amin Khan Kundi)
Member (J)

23.01.2018


Clerk of the counsel for appellant present. Mr. Muhammad Jan, DDA alongwith Mr. Eid-ur-Rahman, for the respondents present. Counsel for the appellant is not in attendance due to general strike of the bar. To come up for arguments on 16.02.2018 before D.B.



Member


Chairman

16.02.2018


Counsel for the appellant and Mr. Muhammad Jan, DDA alongwith Eid Ur Rehman Superintendent for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 20.04.2018 before D.B.


(Ahmad Hassan)
Member(E)


(M. Hamid Mughal)
Member(J)

17.03.2017

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 14.06.2017.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

14.06.2017


Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 11.08.2017 before D.B.



(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

11.08.2017

Clerk of the counsel for appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents present. Clerk of the counsel for appellant seeks adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 06.12.2017 before D.B.


(Muhammad Amin Khan Kundi)
Member (J)


(Muhammad Hamid Mughal)
Member (J)

16.05.2016

Counsel for the appellant and Mr. Owais Shah, Subject Specialist alongwith Ziaullah, GP for respondents present. Directed to provide Member copy of the appeal on the next date. To come up for arguments on 7.10.2016.

Member

Member

07.10.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 13.12.2016.

(MUHAMMAD AAMIR NAZIR)
MEMBER

(PIR BAKHSH SHAH)
MEMBER

13.12.2016

Counsel for the appellant and Mr. Hameed-ur-Rehman, AD (lit.) alongwith Assistant AG for the respondents present. Learned Assistant AG requested that all the relevant record pertaining to the appellant be summoned to the concerned DEO (F). Request accepted. The DEO (F) Karak is directed to appear in person alongwith all relevant record pertaining to the appellant. To come up for record and arguments on 17.3.17 before D.B.

(ASHFAQUE TAJ)
MEMBER

(MUHAMMAD AAMIR NAZIR)
MEMBER

08.09.2015

Counsel for the appellant and Mr. Khurshid Khan, SO alongwith Addl: A.G for respondents present. Rejoinder not submitted. Learned counsel for the appellant requested for further time to submit rejoinder. To come up for rejoinder on 14-10-15.


Member


Member

14.10.2015

None present for appellant. M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Assistant A.G for respondents present. Rejoinder not submitted. Requested for further adjournment. The appeal is assigned to D.B for rejoinder and final hearing for 10.2.2016.


Chairman

10.02.2016

Agent to counsel for the appellant and Mr. Muhammad Owais Zahid, SS alongwith Asst: AG for respondents present. Agent to counsel for the appellant requested for adjournment. To come up for arguments on

16.5.2016


MEMBER


MEMBER

23.1.2015

Clerk of counsel for the appellant and Mr. Muhammad Jan, GP with Khursheed Khan, SO and Javed Ahmad, Supdt. and Muhammad Awais, SS for respondents present and requested for further time to be granted to them for submission of written reply. To come up for the same on 19.3.2015.



MEMBER

19.3.2015

Counsel for the appellant present. Mr. Muhammad Jan, GP with Khursheed Khan, SO and Mosam Khan, AD for the respondents present and requested for time to contact the respondents at District level for preparation of written reply. Request is accepted. To come up for written reply on 01.6.2015.



MEMBER



MEMBER

01.06.2015

Clerk of counsel for the appellant, Mr. Khurshid Khan, SO, Mr. Javid Ahmad, Supdt and Muhammad Awais, S.S alongwith Muhammad Jan, GP for the respondents present. Written reply/comments submitted. The appeal is assigned to D.B for rejoinder and final hearing on 08.09.2015.



Member



Member

1324/13

11.6.2014

Counsel for the appellant, and Mr. Muhammad Jan, GP with Khursheed Khan, SO for respondent No. 1, and Sajjad Rashid, AD for respondents No. 2 & 3 present and requested for further time. Notice be issued to respondent No. 4. To come up for written reply of all the respondents on 24.09.2014.


MEMBER


MEMBER

24.09.2014

Counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO and Sajjad Rashid, AD for respondents No. 1 to 3 present and requested for further time. Fresh notice be issued to respondent No. 4. To come up for written reply of all the respondents on 08.12.2014.


MEMBER

8.12.2014

Counsel for the appellant and Mr. Muhammad Jan, GP, with Muhammad Awais, SS and Javed Ahmad, Supdt. for the respondents present. The Tribunal is incomplete. To come up for the same on 23.1.2015.


READER

Appeal No. 1324/2013
Inst. No. 1007 Speed Begum

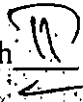
3. 28.11.2013

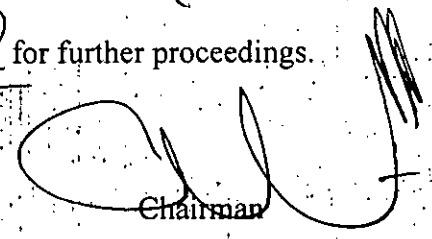
Counsel for the appellant present and heard. Contended that the appellant has not been treated in accordance with law/rules. The impugned order dated 15.08.2013 is illegal no reason has been given as required under General Clauses Act 1897, and that the order has been issued in violation of appeal Rule-5 of the Civil Servants (appeal) rules 1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply on 12.02.2014.

Appellant deposited
4 Process fee & Security
Rs. 2000/- Bank Receipt
attached with file.


Member


4. 28.11.2013

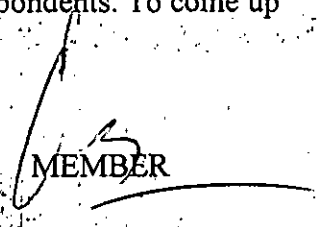
This case be put before the Final Bench  for further proceedings.


Chairman

12.2.2014


Counsel for the appellant and Mr. Muhammad Jan, GP with Khan Rasheed, Supdt. for respondent No. 4 present and requested for adjournment. Fresh notices be issued to other respondents. To come up for written reply on 15.4.2014.

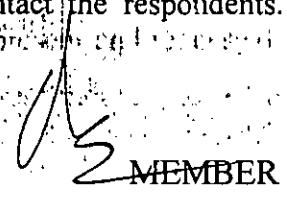

MEMBER


MEMBER

15.4.2014.

Counsel for the appellant, and Mr. Muhammad Jan, GP present and requested for time to contact the respondents. To come up for written reply on 11.6.2014.




MEMBER


MEMBER

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1324 /2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/09/2013	<p>The appeal of Mst. Noorsheed Begum resubmitted today by Mr. Hidayatullah Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	17-9-2013.	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on 28-11-2013.</p> <p style="text-align: right;"> CHAIRMAN</p>


The appeal of Mst. Noorshaeed Begum Ex-PST received today i.e. on 29/08/2013 is incomplete on the following scores which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellatant.
- 2- Annexures- A & B of the appeal are illegible which may be replaced by legible/better one.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.

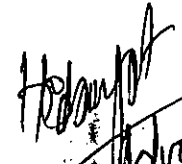
No. 1207 /S.T,

Dt. 29/08 /2013.

Mr. Hidayatullah Khattak Adv. Pesh.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Re-submitted after doing the needful.


Advocate

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 1324 /2013

Mst. Noorsheed Begum.....**Appellant**

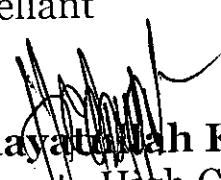
VERSUS

Govt of KPK and others.....**Respondents**

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Grounds of service appeal		1-4
2.	Affidavit		5
3.	Addresses of parties		6
4.	Copy of appointment letter dt.01.04.09	A	7-11
5.	Copy of order dated 28.02.2013	B	12
6.	Copy of departmental representation	C	13
7.	Copy of order dated 15.08.2013	D	14
8.	Copy of service book		15-19
9.	Wakalat Nama		

Through Appellant


Hidayatullah Khattak
Advocate High Court
Cell: 0300-9357757

Date: 29.08.2013

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 1324 /2013

Mst. Noorsheed Begum
(Ex-PST) D/o Gul Janoor
R/o Village Tehsil Koroona, District Karak.....**Appellant**

~~2013-8-13~~
2013-8-13

V E R S U S

1. Govt of KPK,
Through Secretary Education,
KPK, Peshawar
2. Director of Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar
3. Deputy Director
Female Elementary & Secondary Education,
KPK Peshawar
4. Distt Education Officer (Female), Karak....**Respondents**

Appeal u/s 4 of the KPK Service Tribunal Act, 1974 against the termination order dated 28.02.2013 of respondent No.4 and that of respondent No.3, whereby the departmental representation of the appellant has been dismissed on dated 15.08.2013.

~~2013-8-13~~
29/8/13

co-submitted to
and filed.

~~2013-8-13~~
10/9/2013

*
Final order

Prayer in Appeal:

On acceptance of this service appeal, the impugned order dated 28.02.2013 of respondent No.4 & order

(2)

15.08.2013 of respondent No.2 may very graciously be set aside

Respectfully Sheweth:

Brief facts giving rise to the appeal are as under:

1. That the appellant was appointed on 01.11.2009 as PST alongwith other PST Teacher after observing all the codal formalities. (Copy of appointment letter dated 01.04.2009 is Annexure "A").
2. That the appellant was performing her duties with full devotion and there is no complainant whatsoever, has been voiced against her in her entire service.
3. That suddenly on 28.02.2013, the appellant received termination order. (Copy of order dated 28.02.2013 is Annexure "B").
4. That on this, appellant preferred a departmental representation before the competent authority. (Copy of departmental representation is Annexure "C").
5. That the competent authority dismissed the representation of the appellant through an office order dated 15.08.2013. (Copy of office order dated 15.08.2013 is Annexure "D").

6. That being aggrieved of the aforesaid orders, and having no other adequate remedy, the appellant approaches this Honourable Tribunal, on the following grounds amongst others:

G R O U N D S:

- A. That the impugned orders dated 28.02.2013 and 15.08.2013 are manifestly illegal, unlawful, without lawful authority, void ab-initio, without jurisdiction and ineffective upon the valuable rights fo the appellant, hence not tenable and liable to be set aside.
- B. That in the appellant's case, no legal procedure has been adopted as laid down in service laws.
- C. That according to service laws, no one can be punished without giving an opportunity of hearing while in the instant case, the appellant has been condemned unheard.
- D. That prior to termination of services of the appellant, no notice was served upon her as required under the law, on this score alone the impugned orders are liable to be set aside.
- E. That the impugned orders are arbitrary, capricious and not maintainable.

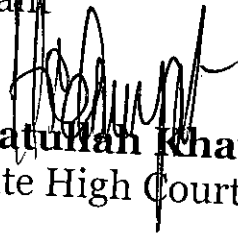
4

F. That any other ground may be adduced during the course of arguments, with the kind permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the impugned order dated 28.02.2013 of respondent No.4 & order 15.08.2013 of respondent No.2 may very graciously be set aside.

Through


Appellant


Hidayatullah Khattak
Advocate High Court

Date: 29.08.2013

5

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2013

Mst. Noorsheed Begum.....**Appellant**

VERSUS

Govt of KPK and others.....**Respondents**

AFFIDAVIT

I, Hidayatullah Khattak Advocate, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT
[Handwritten signature]

4

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2013

Mst. Noorsheed Begum.....**Appellant**

V E R S U S

Govt of KPK and others.....**Respondents**

ADDRESSES OF PARTIES

APPELLANT:

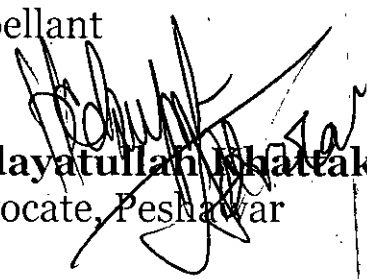
Mst. Noorsheed Begum
(Ex-PST) D/o Gul Jamoor
R/o Village Tehsil Koroona, District Karak

RESPONDENTS:

1. Govt of KPK,
Through Secretary Education,
KPK, Peshawar
2. Director of Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar
3. Deputy Director
Female Elementary & Secondary Education,
KPK Peshawar
4. Distt Education Officer (Female), Karak

Through

Appellant


Hidayatullah Khattak
Advocate, Peshawar

Date: 29.08.2013

A
Annex
7

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION KARAK

APPOINTMENT

Consequent upon the recommendation of the District Board/Selection Committee on behalf of the Government of NWFP School and Literacy Department (Elementary & Secondary Education Deptt) the following candidates are hereby appointed as PST (Primary School Teacher) on Contract basis in BPS - 7(3530-190-9230) PM plus usual allowances as admissible under the rules on 60% open Merit, 40% Union Council wise basis and 2% Disable quota w.e.f the date of their taking over charge on the terms and conditions mentioned below:-

(OPEN MERIT 60%) Posts=25

S.No	Name	Father Name	Union Council	School where Posts	Merit
1	Saima Nousheen	Hamid Ullah	Chokara	GGPS Halala	56.13
2	Saima Noureen	Rasool Khan	North Karak	GGPS Charpara	55.07
3	Asma Chishti	Rasool Khan	North Karak	GGPS Tara No	54.52
4	Ancela Afroz	Mohammad Farid	Sabir Abad	GGPS Maan Khel	64.08
5	Samina Akhtar	Masud Amin	Sabir Abad	GGPS Wator	54.01
6	Rabia Minnaz	Mir Dad Khan	Siraj Khel	GGPS Dak Banda	63.93
7	Khadija Bibi	Umer Khan	W A Abad	GGPS Bahadar Khel No 2	63.72
8	Fazoolat Sultan	Taj Ali Khan	South Karak	GGPS Chanda Khuram	63.72
9	Anwer Jehan	Sar Mohammad han	Nari Paroos	GGPS Dagar Nari No 2	63.18
10	Nadia Raees	Muhammad Raees	Sabir Abad	GGPS Nari Udal Khel	63.12
11	Samina Yaqub	M Yaqub	South Karak	GGPS Chanda Khuram	63.00
12	Nousheen Ayum	Gul Jangor	South Karak	GGPS Chanda Khuram	62.43
13	Zahida Talsoom	Misbah Ud Din	Palesa Sar	GGPS Kaman Zara Khel	61.96
14	Sadia Bibi	Dil Nawab Khan	FNasirah	GGPS Gurgun	61.89
15	Qulaid Begum	Ishtiaq Jan	J E Khel	GGPS Jatta Jamal Khel	61.72
16	Batafat Bashir	Bashir Ansoo	North Karak	GGPS Nari Paroos	61.25
17	Fahad Nisa	Nik Nawaz	Chokara	GGPS Maroon Khel	61.23
18	Zahida Talsoom	Muhammad Talsoom	North Karak	GGPS Bahadar Khel No 2	61.18

ATTESTED

[Handwritten Signature]
20/12/20

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

APPOINTMENT:

Consequent upon the recommendation of the District recruitment/Selection Committee constituted by the NWFP Schools and (Sic). Department (Elementary & Secondary Education) Deptt.) the following candidates are hereby appointed as PST (Primary School Teacher) on contract basis in BPS-7 (3530-190-9230) PM plus usual allowances as admissible under the rules on 60% open merit, 40% Union Council wise basis and 2% Disable Quota w.e.f. the date of their taking over charge on the terms & conditions mentioned below:-

ATTESTED
[Signature]

(Open Merit 60% Posts=25

S.No	Name	Father name	Union Council	School Where Posted	Merit
1.	Saima Nousheen	Hamid Ullah	Chokara	GGPS Halala	66.13
2.	Saima Nousheen	Rasool Khan	North Karak	GGPS Charpara	66.07.
3.		Rasool Shah	North Karak	GGPS Tark Khel	94.30
4.	Aneela Afroz	Mohammad Farid	Sabir Abad	GGPS Manil Khel	64.08.
5.	Samina Akhtar	Mast Amin	Sabir Abad	GGPS Mator	64.01
6.	Rabia Mihnaz	Mir Dad Khan	Siraj Khel	GGPS Dak Banda	63.93
7.	Khadija Bibi	Umer Khan	W.A. Abad	GGPS Bahadar Khel no.2	63.72
8.	Fazeelat Sultan	Taj Ali Khan	South Karak	GGPS Chanda Khurram	63.72
9.	Anwar Jehan	Sar Mohammad Khan	Nari Panoos	GGPS Dagar Nan No.2	63.18
10.	Nadia Raees	Mohammad Raees	Sabir Abad	GGPS Nan Edal Khel	63.12
11.	Samina Yaqub	M. Yaqub	South Karak	GGPS Dorasan Khel	60.00
12.	Noorsheed Begum	Gul Janoor	South Karak	GGPS Chanda Khurram	82.43
13.	Zanida Kalsoom	Misbah Ud Din	Palose Sar	GGPS Kaman Zara Khel	61.96
14.	Sadia Bibi	Dil Nawab Khan	T/Nasrati	GGPS Gurgun	61.89
15.	Dilzad Begum	Islam Jan	J.I Khel	GGPS Jatta Ismail Khel	61.87
16.	Latafat Bashir	Bashir Ahmed	North Karak	GGPS Panoos	61.25
17.	Farhad Nisa	Nik Nawaz	Chokara	GGPS Mardan Khel	61.23
18.	Zakia Farooq	Mohammad Farooq	W.A. Abad	GGPS Bahadar Khel No.2	61.19

8

10	Nazreen Begum	Gol Mir	Ji Khel	CGPS Shaheedan Manni Khel	52.03
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PST Post against 40% Union Council Wise Merit

Union Council Nari Panoo =2

11	Fatek Naz Begum	Nasrul Ullah	Nari Panoo	CGPS Khani Khel	55.18
12	Ifra Ara	Taj Mohammad	Nari Panoo	CGPS Dagar Nari Panoo	50.39

PST Post against 40% Union Council Wise Merit

Union Council Bahadar Khel =3

13	Nadia Shahoon	Roshan Nawaz	Bahadar Khel	CGPS Ahar Ganda	57.37
14	Nadia Shahoon	Roshan Nawaz	Bahadar Khel	CGPS Ahar Ganda	57.34
15	Shabina Begum	Hussain Gul	Bahadar Khel	CGPS Darosh Khel	54.62

DECEASED SON QUOTA (2 Posts)

1	Jahan Taj	Said Akbar	Tan	CGPS Bask Khumbar	48.40
2	Nelo Far	Islam ud Din	T/Nasrati	CGPS Mosa Khel	44.02

Disabled Quota 2%) Posts=01

1	Rafia Naz	M Ayub	Jash	CGPS Inzer Payan	52.66
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TERMS & CONDATION.

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary basis.
4. They should not be handed over charge if they exceed 35 years or below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities. If anyone found producing bogus Certificate he will be reported to the law enforcing agencies for further action and their services will be considered as automatically dismissed with no privileges of the past if any.
6. If they fail to take over charge within fifteen days, the appointment order will be deemed as cancelled.

ATTESTED

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10.	Nazeen Begum	Gel Mir	J.I. Khel	GGPS Shaikan Mami Khel	52.03
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PST Post against 40% Union Council Wise Merit

Union Council Nari Panoos =2

11.	Falak Naz Begum	Nasrul Ullah	Nari Panoos	GGPS Khoni Khel	59.18
12.	Ifat Ara	Taj Mohammad	Nari Panoos	GGPS Dagar Nari No.2	58.39

PST Post against 40% Union Council Wise Merit

Union Council Bahadar Khel =3

13.	Nadia Shaheen	Roshan Nawaz	Bahadar Khel	GGPS Anar Banda	57.87
14.	Nazia Shaheen	Roshan Nawaz	Bahadar Khel	GGPS Anar Banda	57.84
15.	Shabina Begum	Hashim Gul	Bahadar Khel	GGPS Anar Banda	54.62

Deceased son Quota (2 Posts)

1.	Jehan Taj	Said Akbar	Teri	GGPS Esak Khumari	46.40
2.	Nelo Far	Islam ud Din	T/Nasrati	GGPS Mosa Khel	44.82

Disabled Quota 2% Posts=01

1.	Rafia Naz	M. Ayub	Janda	GGPS Lazer Payan	52.66
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Terms & condition

1. No TA/DA etc. is allowed
2. Chare reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary basis
4. They should not be handed over charge if they exceed 35 years of below 18 years of age.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities. If anyone found producing bogus Certificate he will be reported to the law enforcing agencies for further action and their services will be considered automatically dismissed with on privileges of the past if any.
6. If they fail to take over charge within fifteen days, the appointment ord will be deemed as cancelled.

ATTESTED
[Signature]

9

10	Ansa Haleem	M Halim Ullah	North Karak	GGPS Darga Shahidan	60.92
20	Mussrat Bibi	Shafiqat Ullah	North Karak	GGPS Snano Algadi	60.82
21	Farhat Bashir	Bashir Ahmed	North Karak	GGPS Chanda Khurram	60.82
23	Basma Begum	Imam Khan	North Karak	GGPS Masa Khel	60.72
23	Ansa Haleem	M Halim Ullah	North Karak	GGPS Darga Shahidan	60.92
24	Ihsan Zai	Mir Kalam Khan	North Karak	GGPS Kaster Banda	59.96
25	Aisha Karwal	Fazal Rehman	North Karak	GGPS Lawagher Chani Khel	59.60

(Union Council 40%) =15

**PST Post against 40% Union Council Wise Merit
Union Council Shanwa Gudi Khel =2**

1	Muniba Ghani	Noor Ghani Shahi	SG/Khel	GGPS Shah Nacar Koroona	58.11
2	Maryam Khoran	Armat Ullah Khan	SG/Khel	GGPS Sardar Ayaz Koroona	54.36

**PST Post against 40% Union Council Wise Merit
Union Council Sabir Abad =1**

3	Nizat Taj	Taj Wali	Sabir Abad	GGPS Shawa Hundo Kash	58.84
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**PST Post against 40% Union Council Wise Merit
Union Council Ghundi Mir Khan Khel =2**

4	Tasneem Gulab	Taweez Gul	GMK Khel	GGPS Darki	58.49
5	Muqdar Bano	Sultan Bao Shah	GMK Khel	GGPS Darki	53.92

**PST Post against 40% Union Council Wise Merit
Union Council Latamber =1**

6	Rahat Iqbal	Gulzar Khan	Latamber	GGPS Mir Guda	57.40
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**PST Post against 40% Union Council Wise Merit
Union Council Gurguri =1**

7	Pavcen	Harris Mir	Gurguri	GGPS Gurguri	51.59
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**PST Post against 40% Union Council Wise Merit
Union Council Teri =2**

8	Zuhra Iqbal	M. Iqbal Shah	Teri	GGPS Esak Khumari	56.02
9	Mudisra sultana	Iqbal Khan	Teri	GGPS Halala	54.55

**PST Post against 40% Union Council Wise Merit
Union Council Jatta Ismail Khel =1**

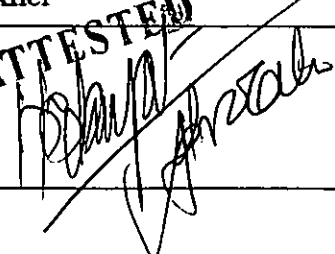
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19.	Ansa Haleem	M. Halim Ullah	North Karak	GGPS Dargar Shahidan	60.92
20.	Mussrat Bibi	Shafqat Ullah	North Karak	GGPS Shano Algadi	60.82
21.	Farhat Bashir	Bashir Ahmed	North Karak	GGPS Chanda Khurram	60.82
22.	Basmar Begum	Misal Khan	Jahangir	GGPS Mosa Khel	60.72
23.	Asma Haleem	M. Halim Ullah	North Karak	GGPS Darga Khel	60.67
24.	Ihsan Zari	Mir Kalam Khan	Manki	GGPS Koster Banda	59.96
25.	Aisha Kanwal	Fazal Rehman	North Karak	GGPS Lawagher Chani Khel	59.60

ATTESTED


Union council 40% = 15

<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Shanwa Gudi Khel =2</u>					
1.	Muniba Ghani	Noor Ghani Shah	SG/Khel	GGPS Shah Nadar Koroona	58.11
2.	Maryum Roshan	Asmat Ullah Khan	SG/Khel	GGPS Sardar Ayaz Koroona	54.36
<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Sabir Abad=1</u>					
3.	Nizat Taj	Taj Wali	Satar Abad	GGPS Shawa Hundo Khash	58.84
<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Ghundi Mir Khan Khel=2</u>					
4.	Tasneem Gulab	Taweez Gul	GMK Khel	GGPS Darki	58.49
5.	Muqdar Bano	Sultan Bad Shah	GMK Khel	GGPS Darki	53.92
<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Latarmber -1</u>					
6.	Rahat Iqbal	Gulzar Khan	Latamber	GGPS Mandawa	59.40
<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Gurguri -1</u>					
7.	Parveen	Hazrat Mir	Garemt	GGPS Gurguri	51.59
<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Teri -2</u>					
8.	Zuhra Iqbal	M. Iqbal Shah	Teri	GGPS Esak Khumari	56.02
9.	Mudisra Sultana	Iqbal Khan	Teri	GGPS Halala	54.55
<u>PST Post against 40% Union Council Wise Merit</u>					
<u>Union Council Jatta Ismail Khel- 1</u>					

10

7. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
8. All the appointees will be entitled for the benefits as admissible to a Civil servant except Pension and Gratuity.
9. The DDC'S are directed to verify their documents from the concerned authorities and submit the original verified copies to the office of the undersigned for release of pay up till/ until their pay may not be released.

(MOHAMMAD IQBAL)
 EXECUTIVE DISTRICT OFFICER
 ELEMENTARY AND SECONDARY
 EDUCATION, KARAK.

Endst: No 2677-85 /AE-I/PS-I/Appointment. Dated Karak the 1/4 /2009

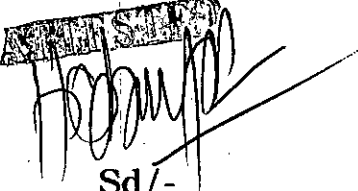
Copy of the above is forwarded to: -

1. Director Elementary & Secondary Edu: Deptt: NWFP Peshawar.
2. District Nazim: Karak
3. District Coordination Officer Karak
4. District Officers (E) Elementary & Secondary Edu: Karak
5. Deputy District Officer (E) Elementary Edu: Karak/ D. S. J. I. Masrati.
6. District Accounts Officer Karak.
7. Candidates concerned.

EXECUTIVE DISTRICT OFFICER
 ELEMENTARY AND SECONDARY
 EDUCATION, KARAK.

ATTESTED

7. Health and age Certificate should be produced from the medical Superintendent concerned before taking over charge.
8. All the appointees will be entitled for the benefits as admissible to a Civil Servant except pension and Gratuity.
9. The DDO'S are directed to verify their documents from the concerned authorities and submit the original verified copies to the office of the undersigned for release of pay up till/until their pay may not be released.



Sd/-

**MOHAMMAD IQBAL
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION KARAK**

Endst. No.2679-85/AE-1/PST/Appointment, Dated Karak the 1/4/2009

Copy of the above is forwarded to:-

1. District Elementary & Secondary Edu; Deptt; NWFP Peshawar
2. District Nazim Karak
3. District Coordination Officer Karak
4. District Officer (M) Elementary & & Secondary Edu. Karak
5. Deputy District Officer (Female) Elementary & & Secondary Edu. Karak
6. District Accounts Officer Karak
7. Candidates concerned

Sd/-
**EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION KARAK**

7. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
8. All the appointees will be entitled for the benefits as admissible to a Civil servant except Pension and Gratuity.
9. The DDO'S are directed to verify their documents from the concerned authorities and submit the original verified copies to the office of the undersigned for release of pay up till/ until their pay may not be released.

(MOHAMMAD IQBAL)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION, KARAK.

Endst:No. 2679-85 /AE-I/ PST/Appointment. Dated Karak the 1/4 /2009.

Copy of the above is forwarded to:-

1. Director Elementary & Secondary Edu: Deptt: NWFP Peshawar.
2. District Nazim Karak.
3. District Coordination Officer Karak.
4. District Officers (M) Elementary & Secondary Edu: Karak
5. Deputy District Officer (M) Elementary Edu: Karak/B.D. Shah/T. Nasrati.
6. District Accounts Officer Karak.
7. Candidates concerned.

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION, KARAK.

OFFICE OF THE DY. DISTRICT OFFICER (M) ELEMENTARY EDU: B.D. SHAH (KF).

Endst:No. 257-261 /File-IEE/Trf. Dated B.D. Shah the 02/04/2009

Copy of the above is forwarded to:-

1. SDC (E/SE) Education Karak.
2. B.ADOs Circle Amadi Banda And Tharwa (M).
3. Deptt: Accounts Officer, Karak.
4. All the Head Teachers of GGIS in Tehsil B.D. Shah.
5. Accts: Local Office.

Dy. Distt: Officer (Female)
Elem: Education B.D. Shah (KF)

ATTESTED

[Handwritten Signature]

7. Health and age Certificate should be produced from the medical Superintendent concerned before taking over charge.
8. All the appointees will be entitled for the benefits as admissible to a Civil Servant except pension and Gratuity.
9. The DDO'S are directed to verify their documents from the concerned authorities and submit the original verified copies to the office of the undersigned for release of pay up till/until their pay may not be released.

ATTESTED
[Handwritten Signature]

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION KARAK

OFFICER OF THE DY; DISTRICT OFFICER (FEMALE) ELEMENTARY EDU. B.D. SHAH (KK)

Endst. No.207-261File-IST/Trf; Dated B.D. Shah the 02.04.2009

Copy of the above is forwarded to the:-

1. EDO (E/SE) Education Karak
2. ADOs Circle Ahmadi Banda and Khurram
3. Distt. Accounts Officer, Karak
4. All the Head Teachers Of GGHS in Tehsil B.D. Shah
5. Acctt. Local Office.

Sd/-

Dy: Distt. Officer (Female)
Elem; Education, B.D. Shah (KK)

OFFICE OF THE DISTRICT EDUCATION OFFICER
ORDER

AB
ANNEX
(2)

A. the documents in respect of the following: (Parents)
Name: [unclear] / [unclear] by [unclear]

has been removed from service with immediate effect for the reasons stated above.

1. Mr. Saime Nourcen, D/O Rasool Khan, PST, G.P.S. [unclear]

2. Mr. Noor Shaid Barun D/O Gul Jangoo, PST, G.P.S. [unclear]

Necessary entry to this effect should be made in the registers.

Order No: *266-71*

Copy to:

- Director, Elementary and Secondary Education, Peshawar.
- S.D.E.C(F), D. Board and Peshawar.
- D.A.O. Karak.
- Teacher concerned.

[Signature]

ATTESTED

[Signature]
[Signature]

12

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) K

ORDER

As the documents in respect of the following PSTC female have been declared fake/bogus by the concerned Board/University.

They are Hereby removed/from service with immediate effect due to reason stated above.

1. Mst. Samia Nooreen D/o Rasool Khan PST (GGPS Cherpara No.02 KK.
2. Mst. Noor Sheed Begum D/o Gul Janoor PST (GGPS Shagi Lawagha)

Sd/-

Endst. No.266-71/Female/Dated 28.02.2013

Copy

1. District Elementary & Secondary Education Peshawar
2. SDE (F) B.D. Shah Karak
- ③ D.A.O Karak
- ④ Teacher Concerned

ATTESTED
H. Khan
A. Khan

جناب محترم ڈائریکٹر ایجوکیشن خیبر پختونخوا پشاور

درخواست برآمد: دوبارہ بحالی بطور (P.S.T) زنانہ

جناب عالی!

مودبانہ گزارش ہے کہ سائلہ مسماة نورشید بیگم دختر گل جانور (P.S.T) کی بطور پرائمری سکول ٹیچر تعیناتی مورخہ: 01-04-2009 کو بمقام خندہ خرم تحصیل بانڈہ داودشاہ ہوئی۔ اس وقت کے ایگزیکٹو ایجوکیشن کے حکم پر تحصیل بانڈہ داودشاہ کے ایس ڈی او (فیمیل) نے 24-07-2012 کو ویریفیکیشن کی اور چھ مہینوں کے بعد ہماری تنخواہیں ریلیز کی گئیں۔ 01-04-2009 تا 08-11-2010 تک ہم نے تحصیل بانڈہ داودشاہ سے تنخواہ باقاعدہ طور پر لیں۔ پھر اس کے بعد سائلہ کا تبادلہ کرک ڈویژن کو ہوا۔ جس کے بعد 24-07-2012 کو دوبارہ ویریفیکیشن کی گئی۔ جس کو بنیاد بنیاد بنا کر، کرک سب ڈویژن میں سائلہ کو 01-12-2010 کے بعد تاحال تنخواہ کی مد میں کوئی ادائیگی نہیں کی گئی۔ تاہم 01-12-2012 کو بانڈہ داودشاہ میں تعینات ٹیچرز کی تنخواہیں ادا کی گئی مگر سائلہ چونکہ کرک سب ڈویژن میں تھیں اس لئے وہ اس سے محروم رہیں۔ مزید ستم یہ کہ مورخہ: 14-02-2013 کو سائلہ کو سروس سے فراغت کا نوٹیفیکیشن بغیر کوئی وجہ بتائے جاری کیا گیا۔ سائلہ کی کل سروس تقریباً 4 سال بنتی ہے۔ سائلہ کو باوجود ویریفیکیشن کے باوجود سروس سے نکال دیا گیا۔ سائلہ کے تمام ضروری اسنادات اور ڈگریاں بمعہ فرسٹ تعیناتی لیٹر درخواست کے ساتھ لف ہیں۔

لہذا التجاء ہے کہ سائلہ کی داریسی کی جائے۔ دوبارہ تعیناتی کے احکامات صادر فرمائے جاوے اور جو تنخواہیں نہیں ہیں ان کی ادائیگی کی جاوے۔ سائلہ تا عمر شکر گزار رہے گی!

Attested
Hedayat
Ahmed

نوازش ہوگی!

Dated: 28-02-2013

العارض

شناختی کارڈ نمبر: 0-14202-3333346

آپ کی احسان مند نورشید بیگم دختر گل جانور پرنسٹل نمبر: 004545590

سکنہ تحصیل کورونہ، ڈاکخانہ، تحصیل ضلع کرک

تعلیمی ریکارڈ:

نمبرز	بورڈ یونیورسٹی	ڈگری
470/850	پشاور بورڈ	میٹرک
507/1100	پشاور بورڈ	ایف۔ اے
652/1100	علامہ اقبال	بی۔ اے
473/900	علامہ اقبال	پی۔ ٹی۔ سی
627/1100	علامہ اقبال	سی۔ ٹی

برائے اطلاع:

- 1۔ جناب ڈائریکٹر ایجوکیشن خیبر پختونخوا پشاور
- 2۔ جناب سیکرٹری ایجوکیشن خیبر پختونخوا پشاور
- 3۔ جناب ڈسٹرکٹ ایجوکیشن آفیسر فیمیل ضلع کرک

DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NO. 1164 /F.No.Appeal (F) Teacher Vol-II
Karak

DATED PESHAWAR THE: 15 / 8 /2013.

20
ANNEX
14

To

Mst. Noorsheed Begum Ex- (PST)
D/O Gul Janoor-Village-Fehsil Koroona
District Karak

Subject:- APPEAL FOR RE-INSTATEMENT AS PST

Memo:-

I am directed to refer to your appeal No. Nil dated 28/02/2013 on the subject cited above and to inform you that your appeal has been rejected by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

for Secretary
Deputy Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

15/8/13

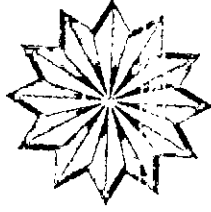
ATTESTED

Hesham
Secretary

SERVICE BOOK

سروس بک

کتاب ملازمت



Name نام

NOOR SHEED Ba gurus

Father's Name والد نام

GULL JANOUR

Qualification قابلیت

B.A

Designation عہدہ

P.S.T Teacher

Department محکمہ

Education

Permanent Address مستقل پتہ

Official Colony Karak.
DIST KARAK.

0333-9719682

Rs: 
ATTESTED

16

SHEED

1. Name (پت) NOOR SHEED BEGUM
2. Nationality and Religion Pakistani (Islam)
(قومیت اور مذہب)
3. Residence _____
(ستقل رہائش)
4. Father's Name and Residence Gul Javed
(والد کا نام اور پتہ)
5. Date of birth Christian era as nearly as can be ascertained 08-10-1931
(تاریخ پیدائش مطابق سن عیسوی) 08th October 1931
& eighty one
6. Exact height by measurement 5-3
(قد و قامت)
7. Personal mark of identification A mole on the
(نشانی شناخت) wrist

8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer.)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (پتھنگلی)

Ring Finger (پتھنگلیا کے ساتھ کی انگلی)

Middle Finger (انگشت مابین)

Fore Finger (انگشت شہادت)

Thumb (انگشت)

9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

Noor Sheed Begum

10. Signature and designation of the Head of the Officer or other Attesting Officer

(تصدیق کنندہ افسر کے دستخط اور مہر) Javeda Begum

Off. Dist. Officer (Fazal)

(S.S.L) Ganda Daud Shah (KQ)

Note: The entries in this page should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحے کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور ہر 5 سالوں کے بعد تصدیق کی ضرورت نہیں۔
انٹیمپٹ کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

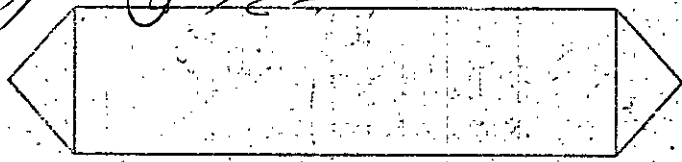
1	2	3	4	5	6	7	8
	Whether substantive officiating any whether permanent or temporary	Official state. (1) substantive appointment of (ii) whether service counts for pension under rule 3-20 C.S.R. (Pb) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of government servant
<p>درجہ ملازم Pst. Post at G.P.S. Chanda Khurram</p>	<p>عارضی مستقل BPS-07</p>	<p>کے ملازمین کا R.S. 3530/-</p>	<p>تجزوہ بطور عارضی ملازمت R.S. 1900/-</p>	<p>زائد تجزوہ بطور قائم مقام R.S. 920/-</p>	<p>میسواے تجزوہ دیگی R.S. 300/-</p>	<p>تاریخ تقرری 02/09/2009</p>	<p>دستخط سرکاری ملازم</p>
<p>Do</p>	<p>Do</p>	<p>R.S. 3720/- p.m.</p>				<p>12/09</p>	

Signature of
the Officer
attesting
in att-
colu

by
(38)

ATTESTED

بعدالتصا حرمین رسولی کی اجازت



نور محمد بیگ

2 منجانب

28/8/2013 مورخہ

مقدمہ

دعویٰ

جرم

نور محمد بیگ
بنام حکومت وکلت

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی مہمقلقہ
آن مقام کے لئے نور محمد بیگ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک در و پیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر این پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا کٹرفہ یا اپیل کی برآمدگی
اور سنسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے
اور اس کا ساختہ پرداخت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا سند ہے

Accepted & accepted

20/8/2013

ماہ

المرقوم

نور محمد بیگ

العبد العبد العبد

مقام لکھنؤ کے لئے منظور ہے۔

29

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1324/2013

Noor Sheed Begum (ex- PST) D/O GulJanoor, R/O village Tehsil Koroona, KARAK

.....Appellant

VERSUS

Govt: of KPK through Secretary E&SE KPK Peshawar and others

.....Respondents

Joint Reply / Para wise comments for and behalf of Respondents No 1 to 4

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections

1. That the appellant has got no cause of action / locus standi.
2. That the appellant is not competent to file the instant appeal against the respondents.
3. That the appellant has not come to this Honourable Tribunal with clean hands.
4. That appellant has concealed material facts from this Honourable Tribunal.
5. That the instant service appeal is bad for non- joinder and mis-joinder of the necessary parties.
6. That the instant service appeal is not maintainable in its present form.
7. That the appellant is estopped by her own conduct to file the instant appeal before this Honourable Tribunal.
8. That the appellant is not entitled to the relief as she has claimed.
9. That the instant service appeal has been filed with malafide intentions.
10. That the instant service appeal is against the relevant provisions of law.

11. That the instant appeal is badly time barred.

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ON FACTS

1. That para 1 is admitted correct to the extent of issuance of appointment orders but the appellant had got the impugned appointment orders on the basis of submission/production of fake, bogus, forged and tampered certificates/degree (documents). Report of the concerned i.e. BISE Hyder Abad Sindh and University of Sind Hyder Abad in this regard are annexed as Annexure A. Further stated that the certificate of SSC and BA are not the same which were provided at the time of apply for PST post. Her own self filled application form for the post of PST and attached documents are annexed as Annexure B.
2. That para 2 pertains to record hence needs no comments.
3. That para 3 of the appeal is incorrect. Actually the termination order of the appellant and another teacher namely Saima Noreen was issued on 14-02-2013 after proper verification of certificates/degree/marks sheets from the concerned Boards and university which were proved as fake and bogus by the relevant institutions. (Copies annexed as annexure C).
4. That para 4 of the appeal is admitted correct with the comments that the certificated/degree/marks sheets provided/ submitted by the appellant were declared fake and bogus by the concerned institutions and appointment order was subject to verification of documents as per terms and conditions, so departmental representation and personal hearing was of no use for appellant.
5. That para 5 is admitted correct with supra comments.

6. That appellant has got no cause of action to file instant appeal.

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ON GROUNDS

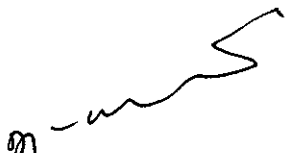
- A. That ground A is incorrect. Actually production and submission of fake and bogus certificates is itself an illegal and unlawful act. Moreover it is a criminal case but being female and woman folk, the respondents adopted a lenient attitude and manner and did not registered a criminal case against the appellant.
- B. That ground B is admitted incorrect. The respondents have adopted adequate legal procedure as laid down.
- C. That ground C is incorrect. The respondents have informed the appellant properly regarding the verification of her documents and her fake and bogus certificates. But the appellant did not replied and kept mum.
- D. That ground D is incorrect with the comments that it has been very clearly mentioned in the terms and conditions of the appointment order that if the certificates of any appointee were found fake and bogus their services will be considered as automatically dismissed with no privileges of past if any.
- E. That ground E is incorrect and baseless with the comments that the appellants herself committed an illegal act and an act of fraud and misappropriation.
- F. That the respondents seek the permission of this Honourable Tribunal to adduce further grounds in course of arguments of the case.


26

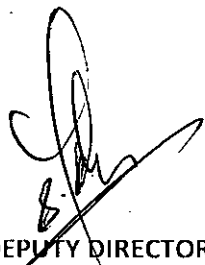
So, it is, therefore, most humbly prayed that keeping in view the above comments and grounds the instant service appeal may graciously be dismissed with special cost.

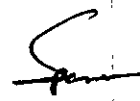
3/

10


SECRETARY
Elementary & Secondary Education
KPK, Peshawar


DIRECTOR
Elementary & Secondary Education
KPK, Peshawar


DEPUTY DIRECTOR
Female Elementary & Secondary Education
KPK, Peshawar


DISTRICT EDUCATION OFFICER (Female)
Elementary & Secondary Education
KARAK

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1324/2013

Noor Sheed Begum (ex- PST) D/O GullJanoor, R/O village Tehsil Koroona, KARAK

.....Appellant

VERSUS

Govt: of KPK through Secretary E&SE KPK Peshawar and others

.....Respondents

AFFIDAVIT

I, SabiraParveen, District Education Officer (Female) Karak, do hereby solemnly affirm and declare that the contents of this joint para wise comments/ reply are true and correct to the best my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

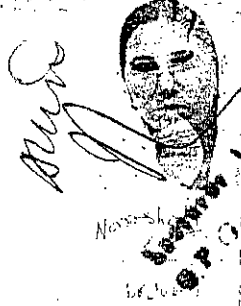
ATTESTED

Amir

حکومت پاکستان

قومی شناختی کارڈ

14202-3333345-0



نام: نور شید بیگم

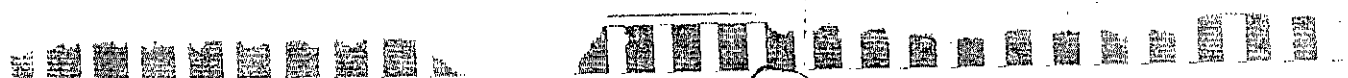
جنس: عورت

تاریخ پیدائش: 08/10/1981

نیشنل شناختی کارڈ: ندارد

تاریخ پیدائش: 08/10/1981

منشی: سید محمد نواز



PSI

درخواست برائے تقرری

12

1: نام (اردو میں) نور شید بیگم

2: نام (انگریزی میں) Noor Sheed Bagum

3: نام ولدیت (اردو میں) گل جانوٹ

4: نام ولدیت (انگریزی میں) Gul Janout

5: قومی شناختی کارڈ نمبر 14202-3333345-0

6: (A) ذریعہ کمرک (B) گاہی اظہار کالانی ٹرک (C) (D) صوبائی طاقت PF40 (E) تحصیل کمرکی

7: تاریخ پیدائش 08-10-1981

BA

امتحان	سال پاس کردہ	مائل کردہ نمبر	کل نمبر	مطابق اشتہار Criteria کے تحت مائل کردہ نمبر	قومی سالانہ
بیک	1996	698	850	30 x 698 = 20940	24.63
ایف اے ایف ایس سی	1998	789	1100	20 x 789 = 15780	14.34
بی اے ایف ایس سی	2000	386	550	10 x 386 = 3860	7.01
ایم اے ایف ایس سی	-	-	-	-	16.43
سند اہلیت	2006	493	900	30 x 493 = 14790	-
کل نمبر	-	-	-	-	62.91

مستند اور اسناد اہلیت کے مطابق

اس نام کے حاملین کے لئے

Noor Sheed Bagum

- (1) بیک کے لئے DMC
- (2) ایف اے ایف ایس سی کے لئے DMC
- (3) بی اے ایف ایس سی کے لئے DMC
- (4) ایم اے ایف ایس سی کے لئے DMC
- (5) سند اہلیت کے لئے DMC
- (6) ذریعہ کمرک کے لئے قومی شناختی کارڈ

غیر ضروری اسناد اہلیت لگانے کی ذمہ داری نہیں ہے۔

Karimullah
Nasir Nazim

Board of Intermediate & Secondary Education

HYDERABAD, SINDH.

Certificate No. A A-96-671



Group SCIENCE / GENERAL

Seat No. 78118

Secondary School Certificate Examination

Annual/Supplementary 1996

This is to certify that Noor Sheed Begum

Father's Name Gul Janoor

Surname Yousaf Abad

of the Govt; High School Yousaf Abad HYD.

has passed the Secondary School Certificate Examination held in
the month of May 1996 and was placed in

The Candidate qualified in the following subjects:-

Grade A.One

Component I

- Urdu & Sindhi Salees
- Sindhi & Urdu Salees
- English
- Pakistan Studies
- Islamiat/Civics

Component II

- Science Group
- Physics
 - Chemistry
 - Mathematics
 - Biology

Component III

- General Group
- General Science
 - General Mathematics
 -
 -

Grade A.One

The date of birth as recorded in the admission form

is (08-10-1981) Eight October

One Thousand Nine Hundred and Eighty One

The Examination was taken as a whole / in Parts

Hyderabad, Sindh

Dated 10.10.1996

[Signature]
Controller of Examinations.

[Signature]
Secretary

IFICATE No: A-45-6717

SIND

GROUP: SCIENCE

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION HYDERABAD

MARKS CERTIFICATE



ONDARY SCHOOL CERTIFICATE PART I-II (CLASS IX-X)

ANNUAL

EXAMINATION 1996

NAME: Noor Sheed Begum

FATHER'S NAME

Gul Janoor

NAME: Yousaf Abad

SEAT NUMBER

78118

Govt; High School Yousaf Abad HYD.

	COMPONENT I						COMPONENT II						Total Marks Obtained out of 850	Pass/Fail	DISTINCTION	COMPONENT III	
	S = Sindhi U = Urdu-I	English		Islamiat C = Civics for non Muslims	Pakistan Studies	Physics		Chemistry		Mathematics	Biology					Assessment Done by School	Marks Secured out of 250 and Title
		Paper-I	Paper-II			Theory	Practical	Theory	Practical		Theory	Practical					
Marks:	75	75	75	75	75	75	25	75	25	100	75	25					
Percentage:	25	25	25	25	25	25	08	25	08	33	25	08					
Total Score:	82	70	68	79	82	25	27	19	13	80	56	75	22	698	PASS		

(in words) Six Hundred Ninety Eight

GRADE

A. ONE

10.1996

CONTROLLER OF EXAMINATIONS

erial No 1189

Roll No 12690

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION HYDERABAD
SINDH



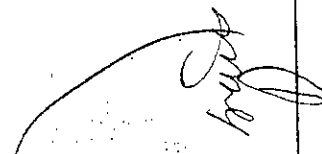
MARKS CERTIFICATE

DETAILED MARKS CERTIFICATE

INTERMEDIATE AND SECONDARY EDUCATION (HUMANITIES GROUP)

Session 19 98 Annual /Supplementary

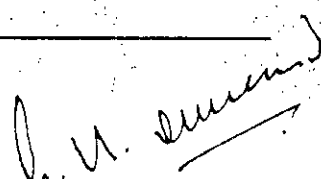
Name: Noor Sheed Begum Father's Name: Gul Janoor

SUBJECTS	MARKS				
	Subjects Marks	Obtained			Remarks
		Part-I	Part-II	Total	
1. English	200			130	 Seven hundred
2. Urdu	200			142	
3. Islamic Education	50			30	
4. Pakistan Studies	50			22	
5. Phy	200			151	
6. Chem	200			140	
7. Bio	200			174	
Total :	1100			789	Eighty nine

Note: this Certificate is issued error and omission excepted. Total in words _____

Prepared by :  Checked by 

Date: _____


Controller of Examinations

HYDERABAD, SINDH

Certificate No 012121

Group Pre-Medical

Seat No 78542

Roll No 12690

Annual/Supplmrntary 1998

This is to certify that Noor Sheed Begum

father's Name Gul Janoor

Reg:No 69- GCH-2541

of the Govt, Girls College Yousaf Abad Sindh

Passed Secondary School Certificate Examination held in
and was placed in

The Candidate qualified in the following subjects:-

He/she Obtained Marks 789 out of 1100

1. Urdu & Sindh Salees
2. English
3. Pakistan Studies
4. Islamiat


5. Physics
6. Chemistry
7. Biology

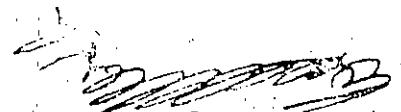
Grade A

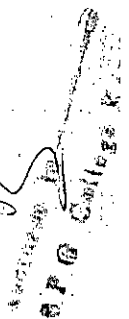
Grade A

The Examination was taken as a whole / in parts

Hyderabad, Sindh
Dated August 08, 1998


Controller of Examinations


Secretary


Govt. Girls College, Yousaf Abad, Sindh



S.No 023437

UNIVERSITY OF HYDERABAD SINDH
HYDERABAD (PAKISTAN)
DETAILED MARKS CERTIFICATE

Bachelor of Arts (B.A) Part II Annual Examination, 2000

Name Noor Sheed Begum Roll No 8822
Father's Name: Gul Janoor Reg No 98-UHD-3625

Certified that the candidate secured the following marks and is placed in 1st Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In W o r d s
English Compulsory	75	60	Sixty Only
Political Science	75	55	Fifty Five
Urdu	75	46	Forty Six
Pak Studies	40	30	Thirty Only
<i>Part-I Marks</i>	285	195	One Hundred and Ninety Five
Total	660	386	Three Hundred and Eighty Six

Handwritten signature and stamp of the Controller of Examinations.

The examination was taken as a Whole

Result declared on 12-06-2000

Tahr

Errors and omissions are subject to
Subsequent rectification.

Handwritten signature
Controller of Examinations
University of Science and Technology

Roll No. 8822

University of Hyderabad Sindh

Hyderabad Pakistan



Having fulfilled all the requirements for the Degree of

BACHELOR OF ARTS

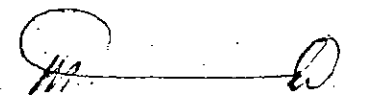
In the subject of

Noor Sheed Begum D/o Gul Janoor

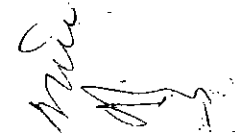
is the Eleventh day of June 2000 admitted to the above Degree

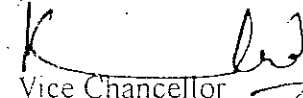
Issue Date 12-06-2000

Registered No. 98-UHD-3625


Controller of Examinations


Registrar




Vice Chancellor

Alama Iqbal Open University
Islamabad

Serial No 178948



Certified that *Mr/Ms* NOORSHEED BEGUM
Son/Daughter of GUL JANOOR
Registration No. 00 NKK 0328 *Roll No.* J 6187347
Semester SPRING 2006

having met all the requirements
under the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured 55 % *marks*
and has been placed in C *grade*



M. Iqbal
Controller of Examinations

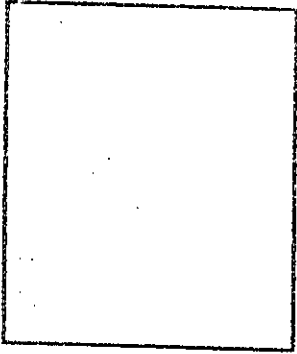
Result declared on: January 19, 2007

Date of issue: July 16, 2007

[Signature]
Controller of Examinations

Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

DOMICILE CERTIFICATE



I declare that I was born of parents who are permanently domiciled in N.W.F.P. having been born in this Province.

I was born at Karak City.

Name Noorsheed Begum

Signature _____

Resident of Karak City.

Tehsil Karak

District Karak

Date 5/9/1998.

In pursuance to the declaration dated 5/9/1998.

by Noorsheed Begum

~~Subbaraj~~ D/O Gul Jansor

Of Karak

Tehsil Karak

District Karak

to the effect that he has been born of parents who are permanently domiciled in N.W.F.P. Province.

It is hereby certified that the said Noorsheed Begum parents are permanent residents of N.W.F.P. Province having been born within it.

I have satisfied myself from ~~own~~ knowledge / by verification through N.T. Karak that the above declaration is true and certify accordingly.

Given under my hand and that the seal of the Court this _____

5th day of Sep. 1998



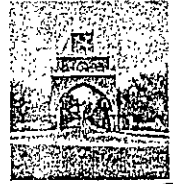
Magistrate 1st Class Karak.

Muhammad
Lecturer in Law
N.W.F.P. College of Law
Karak



University of Sindh

Allama I.I. Kazi Campus, Jamshoro, Sindh, Pakistan



Controller of Examinations (Annual)

No: EX/Sec/Verif/ 1535
Dated: 19-12-2012

[Handwritten signature]
26/12/12

The Executive District Officer Elementary and Secondary,
Karak.

Subject: VERIFICATION OF EDUCATIONAL DOCUMENTS

B.A.

Dear Sir,

With reference to your letter No: 6112, Dated: 11-09-2012, I am enclosing herewith the photocopy of Mark sheets forwarded by your good office has been Verified from the University record is as under:

S#	Name	Degree	Seat#/Year	Remarks
1	Saima Noreen D/o Rasool Khan	B.A-II	8723/A/2002	BOGUS
2	Noor. Shed Begum D/o Gul Janoor	B.A II	8822/A/2000	BOGUS

This is for your kind information and further necessary action.

Sincerely yours,

[Handwritten signature]

Assistant Controller of Examinations
University of Sindh,
Jamshoro.



S.No 023437

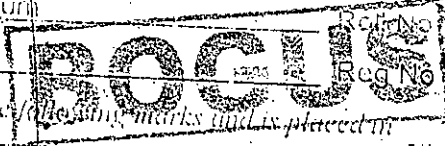
UNIVERSITY OF HYDERABAD
HYDERABAD (PAKISTAN)
DETAILS OF MARKS CERTIFICATE

Bachelor of Arts (B.A) Part II Annual Examination, 2000

Name: Noor Sheed Begum

8822

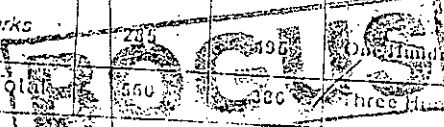
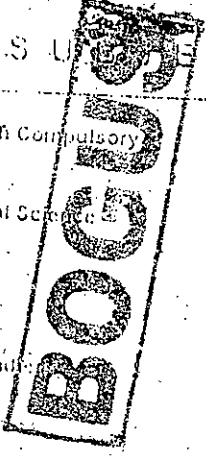
Father's Name: Gul Janoor



Reg No 98-UHD-3625

Certified that the candidate secured the following marks and is placed in 1st Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
English Compulsory	75	60	Sixty Only ✓
Political Science	75	55	Fifty Five ✓
Urdu	75	46	Forty Six ✓
Pak Study	40	30	Thirty Only ✓
Part-I Marks	285	195	One Hundred and Ninety Five
Total	550	380	Three Hundred and Eighty



The examination was taken as a Whole

Result declared on 12-06-2000

Verified & Found Correct

[Signature]

Controller of Examinations,
University of Science and Technology

Controller of Examinations,
University of Hyderabad

Board of Intermediate & Secondary Education Hyderabad Sindh
No. BISE/V.Cell/2418

Dated: 27-11-12.

CONFIDENTIAL
Through TCS

To

The E.D.O
(E&S Education)
K A R A K. (K.P.)

SUBJECT: VERIFICATION OF SSC CERTIFICATES

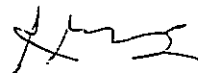
Reference:- Your Letter No. 7205/AE-III (F) dated: 01-11-2012.

It is to inform you that the photo copies of Marks Certificates of the following students received were checked and found as per details given below:-

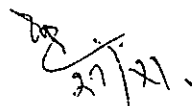
S.NO	NAME OF STUDENT IN FULL	SEAT NO & YEAR	CLASS	POSITION
1.	SAIMA NOREEN D/O RASOOL KHAN	78225 / 1998	SSC	BOGUS
2.	NOOR SHEED BEGUM D/O GUL JANOOR	78118/ 1996	SSC	BOGUS

The Marks Certificates found Bogus/ Fabricated and can not be authenticated so detained with the Boar. office

You are requested to take necessary action against the students under intimation to this office.



DY: CONTROLLER OF EXAMINATION


27/12

ificate No: A-45-6717

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION HYDERABAD

SIND

GROUP: SCIENCE

MARKS CERTIFICATE



ONDARY SCHOOL CERTIFICATE PART I-II (CLASS IX-X)

ANNUAL

EXAMINATION 1996

NAME: Noor Sheed Begum

FATHER'S NAME

Gul Hanoor

NAME: Yousaf Abad

SEAT NUMBER

78118

Govt; High School Yousaf Abad HYD.

	COMPONENT I						COMPONENT II						Total Marks Obtained out of 850	Pass/Fail	DISTINCTION	COMPONENT III		
	S = Sindhi U = Urdu-I	US = Urdu Salis SS = Sindhi Salis Urdu II	English		Islamiyat C = Civics for non Muslims	Pakistan Studies	Physics		Chemistry		Mathematics	Biology				Assessment Done by School	Marks Secured out of 250 and Title	
			Paper-I	Paper-II			Theory	Practical	Theory	Practical		Theory						Practical
Marks:	75	75	75	75	75	75	75	25	75	25	100	75	25					
Percentage:	25	25	25	25	25	25	25	08	25	08	33	25	08					
Total:	82	70	68	79	82	25	27	19	13	80	56	75	22	698	PASS			

(in words) Six Hundred Ninety Eight

GRADE

A. ONE

10.1996

CONTROLLER OF EXAMINATIONS

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,

PESHAWAR

In the matter of
Service Appeal No. _____/2015
Date of hearing 14.10.2015

Noor Sheed Begum.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others. Respondents

REJOINDER TO THE COMMENTS SUBMITTED

BY THE RESPONDENTS

Respectfully Sheweth:

Reply to the Preliminary Objections:

All preliminary objections raised by the respondents are illegal, vogue, frivolous and without substance, therefore, not worth consideration, the appellant has got locus standi to file the appeal, the same is competent, there is no estoppel against him, the appeal is well within time, the appellant has come to the Tribunal with clean hands and there is no mis-joinder or non-joinder of necessary parties.

ON FACTS:

1. In reply to the contents of Para No.1 of the reply, it is submitted that the appellant got the appointment letter dated 01.04.2009 on the basis of attested

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,

PESHAWAR

In the matter of
Service Appeal No. _____/2012
Date of hearing 14.10.2012

Noor Sheed Begum.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others... Respondents

REJOINDER TO THE COMMENTS SUBMITTED

BY THE RESPONDENTS

Respectfully Sheweth:

Reply to the Preliminary Objections:

All preliminary objections raised by the respondents are illegal, vague, frivolous and without substance, therefore, not worth consideration, the appellant has got locus standi to file the appeal, the same is competent, there is no estoppel against him, the appeal is well within time, the appellant has come to the Tribunal with clean hands and there is no mis-joinder or non-joinder of necessary parties.

ON FACTS:

1. In reply to the contents of Para No.1 of the reply, it is submitted that the appellant got the appointment letter dated 01.04.2009 on the basis of attested

photo copies of the educational testimonials, it is further submitted that the (Annex-A) of the reply is wrong, baseless because appellant has never submitted these documents rather the documents which is attached with this rejoinder has been submitted with application form of appointment. The document which has been attached and submitted with application are attached as annexure "A1".

It is also further stated that in the year 2012 the DEO (Femal) Karak after verification of documents of the appellant released the salary of the appellant which is also attached with this rejoinder.

2. Para No.2, In reply to Para No.2 as admitted by respondents hence need no rejoinder.
3. In reply to Para No.3 of the comments , it is submitted that the he respondents have already verified the documents of the appellant as evident form the attached letter no Edndst No.266-68/file-PST dated 24.02.2012. The documents which the respondents have sent for verification are not submitted by appellant with her application of appointment for PST teacher.
4. In reply to the contents of the Para No.4 of the reply it is submitted that the document which has been sent to verification by the respondents are not related the appellant, as submitted in the earlier

annexure 'A1'.
submitted with application are attached as
The document which has been attached and
submitted with application form of appointment.
which is attached with this rejoinder has been
submitted these documents rather the documents
wrong, because appellant has never
further submitted that the (Annex-A) of the reply is
photo copies of the educational testimonials, it is

It is also further stated that in the year 2012 the DEO
(Female) Karak after verification of documents of the
appellant released the salary of the appellant which
is also attached with this rejoinder.

2. Para No.2, in reply to Para No.2, as admitted by
respondents hence need no rejoinder.

3. In reply to Para No.3 of the comments, it is submitted
that the respondents have already verified the
documents of the appellant as evident from the
attached letter no Ednast No.266-68/tille-PST dated
24.02.2012. The documents which the respondents
have sent for verification are not submitted by
appellant with her application of appointment for
PST teacher

4. In reply to the contents of the Para No.4 of the reply
it is submitted that the document which has been
sent to verification by the respondents are not
related the appellant, as submitted in the earlier

Para the documents which are attached with this rejoinder are the documents, submitted by the appellant, while applying for the PST Post.

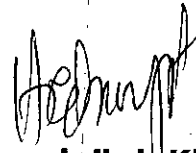
5. Incorrect, the order of the respondents is illegal, and without any justification.

GRUNDS:

All the replies submitted by the respondents in the replying on grounds are incorrect while all the grounds taken by the appellants valid and correct.

It is, therefore, most humbly prayed that acceptance of this rejoinder, contents of the reply/ comments submitted by respondent are being without any substlan, the appeal may please be allowed as pray for in the memo of the appeal.

Through Appellant



Hidayatullah Khattak
Advocate, Peshawar

Dated: 14.10.2015

For the documents which are attached with this rejoinder are the documents submitted by the appellant while applying for the FST Post.

2. Incorrect, the order of the respondents is illegal, and without any justification.

GROUND 2:

All the replies submitted by the respondents in the replying on grounds are incorrect while all the grounds taken by the appellants valid and correct.

It is, therefore, most humbly prayed that acceptance of this rejoinder, contents of the reply comments submitted by respondent are being without any substance, the appeal may please be allowed as pray for in the memo of the appeal.

Appellant
Through

Abdullah Khattak
Advocate, Rawalpindi

Dated: 14.10.2012

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

In the matter of
 Service Appeal No. _____/2015
 Date of hearing 14.10.2015

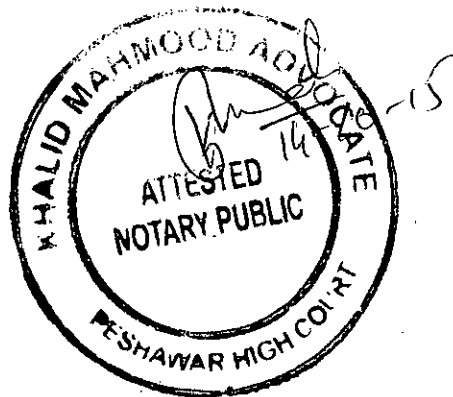
Noor Sheed Begum.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, Hidayatullah Khattak, Advocate High Court as per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



Hidayatullah Khattak
DEPONENT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA

PESHAWAR

In the matter of
Service Appeal No. _____/2015
Date of hearing 14.10.2015

Noor Steed Begum.....Appellant

versus

Govt. of Khyber Pakhtunkhwa & others respondents

AFFIDAVIT

I, Hidayatullah Khattak, Advocate High Court as per instructions of my client do hereby solemnly affirm and declare on oath that the contents of the accompanying ~~return~~ rejoinder are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

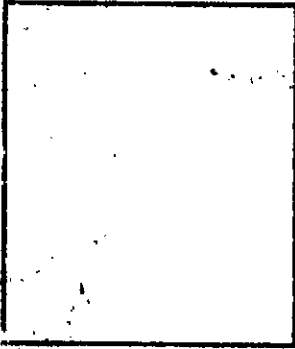
DEPONENT

5

Am - A

1

DOMICILE CERTIFICATE



I declare that I was born of parents who are permanently domiciled in N.W.F.P. having been born in this Province.

I was born at Karak City.

Name Noorsheed Begum

Signature _____

Resident of Karak City.

Tehsil Karak

District Karak

Date 5/9/1998.

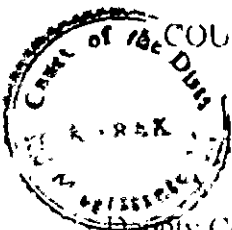
In pursuance to the declaration dated 5/9/1998.
by Noorsheed Begum ~~XXXXX~~ D/C Gul Jancor
Of Karak Tehsil Karak District Karak
to the effect that he has been born of parents who are permanently domiciled in N.W.F.P. Province.

It is hereby certified that the said Noorsheed Begum parents are permanent residents of N.W.F.P. Province having been born within it.

I have satisfied myself from ~~own~~ knowledge / by verification through N.T. Karak that the above declaration is true and certify accordingly.

Given under my hand and that the seal of the Court this

5th day of Sep. 1998



COUNTERSIGNED

Deputy Commissioner, Karak.

Magistrate 1st Class

Karak

1998

30

86/198
NMT
8

دو
کتاب
میں
لکھی
گئی

86/198

میں نے اس کتاب کو
پڑھا اور اس میں
کئی چیزیں یاد آئیں
جو اس وقت تک
میرے ذہن سے
مٹ چکی تھیں

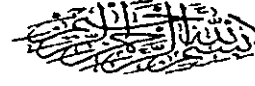
Mohammad Reza
100
100

اس کتاب اور اس میں لکھی گئی

اس کتاب سے میری زندگی میں
کئی چیزیں یاد آئیں جو
میرے ذہن سے مٹ چکی تھیں

S.No. 26314

6



Roll No. 110171



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1998 – ANNUAL
(Humanities Group)

This is to Certify that Noorsheed Begum Son / Daughter of Gul Janoor
and a student of Govt: Girls Higher Secondary School, Karak has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1998 as a Regular
candidate. He / She obtained 470 Marks out of 850 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|--------------------|----------------------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Islamic Studies |
| 2. Urdu | 4. Pakistan Studies | 6. General Science | 8. Elements of H/Economics |

He / She has been awarded Grade D on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form October 8, 1981

[Signature]
Assst. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure.

(7)

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE

Intermediate Examination Humanities Group

Part - I

Session 19 99 (Annual)

Sr. No. 16477



Name Muhammad Sheed Begum

Father's Name Paul Janoor

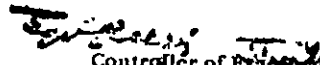
Roll No. 115379


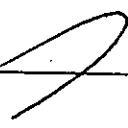
SUBJECT	Total Number of marks allotted	* F	MARKS OBTAINED	
			In Figures	In words
1. English-I	100		48	
2. Urdu-I	100		43	
3. Islamic Education	50		29	
4. <u>IS</u>	100		59	
5. <u>IA</u>	100		44	
6. <u>HPLE</u>	100		59	
Total	550		282	

Note: Errors / omissions excepted

F: Failed in the paper(s).

Date _____ 19 _____


Controller of Examination
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by  Checked by 

S.No. 65230

Roll No. 66027

Group. Humanities



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2000 - ANNUAL

This is to Certify that Noor Sheed Begum Daughter of Gul Janoor
and a student of Govt: Girls College, Karak Registered No. 64-B/GGHK-98
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May/June, 2000 as a Regular Candidate. She obtained 507 Marks out of 1100
and has been placed in Grade D Representing Fair. She has been awarded Grade C on the
basis of internal assessment by the institution concerned. The Examination was taken as a whole.


Asstt/Secretary


Secretary

(9)

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE
Intermediate Examination Humanities Group
SESSION 19 2002 (Annual/Supplementary)



Sr. No.

119227

Name

Xlor Sheed Begum

Father's Name

Gul Janear

Roll No.

66027

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			73	/
2. Urdu	200			93	
3. Islamic Education	50			53	
4. Pakistan Studies	50				
5. <u>914</u>	200			77	
6. <u>414</u>	200			102	
7. <u>15</u>	200			109	
Total	1100			507-D	<i>First class</i>

Note : Errors/Omissions excepted.

Date

15 AUG 2002

19

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by

Checked By

(10)

Allama Iqbal Open University
Islamabad



Serial No 151164

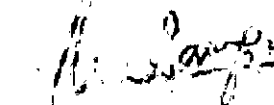
Certified that *Mr/Ms* NOOR SHEED BEGUM
Son/Daughter of GUL JANOOR
Registration No 00NKK0328 *Roll No* AD410334
Semester Spring 2011 *having met all the requirements under*
the semester system is this day awarded the degree of

Bachelor of Arts
Group - General

He/She has secured 59 *%marks*
and has been placed in C *grade*


CONTROLLER OF EXAMINATIONS




VICE-CHANCELLOR

Result declared on: February 27, 2012

Date of issue: August 11, 2012

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

Alama Iqbal Open University
Islamabad

Serial No 178948



Certified that *Mr/Ms* NOORSHEED BEGUM
Son/Daughter of GUL JANOOR
Registration No 00 NKK 0328 *Roll No* J 6187347
Semester SPRING 2006 *having met all the requirements*

under the semester system is this day awarded the



Primary Teaching Certificate

He/She has secured 55 % *marks*
and has been placed in C *grade*



Result declared on: January 19, 2007

Date of issue: July 16, 2007


Controller of Examinations


Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
613	Principles of Education	62
614	Eudcational Psychology	52
615	School Organization & Management	44
616	School Community & Practical Arts	51
617	Teaching of Urdu	56
618	Teaching of Mathematics	52
619	Teaching of Science & Physical Education	47
620	Teaching of Islamiat & Social Studies	47
611	Practical Workshop & Teaching Practiçe	82

Total credit hours **XXX**

Obtained / Total marks **493 / 900**

Total credits AIOU **5**

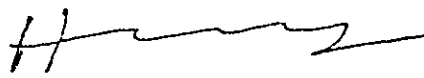
Cumulative grade point average **XXX**

First semester: **SPRING 2000**

Final semester **SPRING 2006**

Grading Scheme

80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail


Controller of Examinations



(12)

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 505078

PROVISIONAL RESULT CARD

Name NOOR SHEED BEGUM
 Father's Name GUL JANDOR
 Address ZAFAR AND BROTHERS SUGAR ATTA GE DEALAR
 KARAK
 Tehsil KARAK
 District KARAK
 has successfully completed BACHELOR OF EDUCATION (B. ED)

Roll No. AP653355
 Registration No. 00NKK0328
 Final Semester SPR-2013

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 12	0512	PERSPECTIVES OF EDUCATION	100	66
AUT- 12	0513	SCHOOL ORGANIZATION	100	57
AUT- 12	0514	EVALUATION, GUIDANCE & RESEARCH	100	69
AUT- 12	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	67
AUT- 12	0651	ENGLISH (COMPULSORY)	100	68
AUT- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	69
SPR- 13	0517	TEACHING OF PAKISTAN STUDIES	100	57
SPR- 13	0654	TEACHING OF ISLAMIC AT	100	61
SPR- 13	0655	WORKSHOP & TEACHING PRACTICE	100	85



CREDITS: 6

Total Marks / Obtained

900 / 599

Result Declared on DECEMBER 26, 2013

Percentage / Grade

67 B

Date of issue JANUARY 07, 2014

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

13

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No. **A 1511**

Name
Father's Name **NOO SHEED BEGUM**
Address **GUL JANOOR**

Roll No. **AM659954**
Registration No. **11NKK01592**
Final Semester **SPRING 2012**

Tehsil **KARAK**
District **KARAK**
has successfully completed

Certificate of Teaching

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUTUMN 2011	631	DIMENSIONS IN EDUCATION	100	67
AUTUMN 2011	632	EDUCATIONAL PSYCHOLOGY	100	66
AUTUMN 2011	633	SCHOOL ORGANIZATION	100	75
SPRING 2012	634	ENGLISH AND ITS TEACHING	100	64
AUTUMN 2011	638	TEACHING STRATEGIES & EVALUATION	100	71
SPRING 2012	612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	83
SPRING 2012	604	URDU LANGUAGE AND ITS TEACHING	100	67
SPRING 2012	605	SOCIAL STUDIES & ITS TEACHING	100	68
SPRING 2012	635	ISLAMIAT AND ITS TEACHING	100	66

Credits: 5

Total Marks / Obtained

800

627

Result Declared on **JANUARY 16, 2013**

Percentage / Grade

78

A

Date of issue **April 28, 2013**

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



Serial No. 200774

Certified that Mr. / Ms. NOORSHEED BEGUM

Son / Daughter of GUL JANOOR

Registration No: 00NKK0328 *Roll No:* AP653355

having successfully completed the prescribed requirements

in semester SPRING 2013 *is awarded the degree of*

Bachelor of Education (B.Ed)

He / She has secured 67 *% marks and has been placed in* B *grade.*

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: December 26, 2013

Date of issue: June 16, 2014

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

(15)

OFFICE OF THE DY. DISTRICT OFFICER (FEMALE) ELEM: EDU: B.D.SHAH (KK)
PAY RELEASE ORDER.

Consequent upon the verification of documents received from the concerned boards/university are duly verified in r/o Mst: Noorshedd Begum, PST CGPS Chunda khurram, the pay is hereby released w.e.f.01-12-2010 in the best interest of public service.

Sd/-
Dy: Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

Endst:No. 266-62/File-PST

Dated B.D.Shah the. 24/12/2012.

Copy of the above is to the:-

1. Executive Distt: Officer (E&SE) Karak.
2. Dy: Distt: Officer (Female) Pry: Karak.
3. Distt: Accounts Officer Karak.

Sd/-
Dy: Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

No. _____

Dated: Khurram the. 10/07/2012.

From:-

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

To:-

The Dy: Distt: Officer (Female)
Pry: B.D.Shah (KK)

Subject:- RELEASE OF PAY

Memo:-

Reference your Office Endst:No.224-26/Pay. Service dated 18-06-2012 and subsequent let. number bearing No.250/Pay. Service Book dated 03-07-2012 addressed to the under signed and copy there of to office.

It is stated that Miss. Noorsheed Begum was appointed as PST at GGHS Chunda Khurram vide Executive Distt: Officer Endst: No.2679-85/AB-1/PST/Appnt: dated 01-04-2009. Later on she was transferred to GGHS Shagi Lawagnar (under control of (Dy. DO (F) Pry Karak) vide Executive Distt: Officer 6880-55/AB-11/PST/(F) dated 08-11-2010. The salary of all appointee's mistresses have been drawn upto 30-11-2010 including (Noorsheed Begum) later on the documents were sent to the authorities concerned for verification, hence the salaries of all the fresh appointee's were stopped due to awaiting of verification of documents. As the Noorsheed Begum, was transferred to Karak Sub Division hence, the Dy: Distt: Officer (Female) Karak was informed not to draw the salary of above mistress due to awaiting of verified documents. As the undersigned has relinquished the charge of the post of Dy: Distt: Officer (Female) B.D.Shah on 02-05-2012. If now the documents of the mistress are verified and received from the agency concerned, you in chair can release the salary of the mistress in the light of direction/instructions already conveyed by the Executive Distt: Officer (E&SE) Karak (Copy of the said direction/instructions is lying in your Office).

It is added in your own interest to issue release order of salary of those mistresses, whose documents has received verified in the best interest of public service and the service books of transferred mistresses be sent to Dy: DO (Female) Pry: Karak.

It is further added that this is the whole story regarding stoppage of pay.

Sd/-

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

Endst:No. 5-6 1.

Copy of the above submitted to the:-
1. Executive District Officer (E&SE) Karak.
2. Dy: Distt: Officer (Female) Pry: Karak

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

In the matter of
Service Appeal No. _____/2015
Date of hearing 14.10.2015

Noor Sheed Begum.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others. Respondents

REJOINDER TO THE COMMENTS SUBMITTED
BY THE RESPONDENTS

Respectfully Sheweth:

Reply to the Preliminary Objections:

All preliminary objections raised by the respondents are illegal, vogue, frivolous and without substance, therefore, not worth consideration, the appellant has got locus standi to file the appeal, the same is competent, there is no estoppel against him, the appeal is well within time, the appellant has come to the Tribunal with clean hands and there is no mis-joinder or non-joinder of necessary parties.

ON FACTS:

1. In reply to the contents of Para No.1 of the reply , it is submitted that the appellant got the appointment letter dated 01.04.2009 on the basis of attested

photo copies of the educational testimonials, it is further submitted that the (Annex-A) of the reply is wrong, baseless because appellant has never submitted these documents rather the documents which is attached with this rejoinder has been submitted with application form of appointment. The document which has been attached and submitted with application are attached as annexure "A1".

It is also further stated that in the year 2012 the DEO (Femal) Karak after verification of documents of the appellant released the salary of the appellant which is also attached with this rejoinder.

2. Para No.2, In reply to Para No.2 as admitted by respondents hence need no rejoinder.
3. In reply to Para No.3 of the comments , it is submitted that the he respondents have already verified the documents of the appellant as evident form the attached letter no Edndst No.266-68/file-PST dated 24.02.2012. The documents which the respondents have sent for verification are not submitted by appellant with her application of appointment for PST teacher.
4. In reply to the contents of the Para No.4 of the reply it is submitted that the document which has been sent to verification by the respondents are not related the appellant, as submitted in the earlier

Para the documents which are attached with this rejoinder are the documents, submitted by the appellant, while applying for the PST Post.

5. Incorrect, the order of the respondents is illegal, and without any justification.

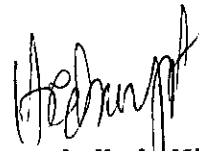
GRUNDS:

All the replies submitted by the respondents in the replying on grounds are incorrect while all the grounds taken by the appellants valid and correct.

It is, therefore, most humbly prayed that acceptance of this rejoinder, contents of the reply/ comments submitted by respondent are being without any substlan, the appeal may please be allowed as pray for in the memo of the appeal.

Through

Appellant



Hidayatullah Khattak
Advocate, Peshawar

Dated: 14.10.2015

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

In the matter of
 Service Appeal No. _____/2015
 Date of hearing 14.10.2015

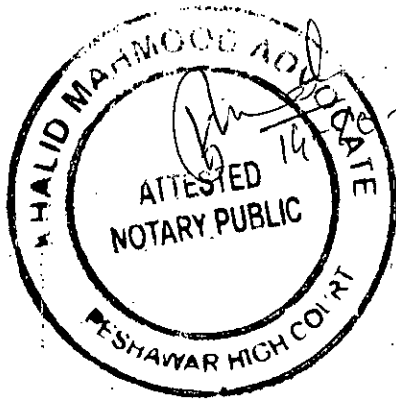
Noor Sheed Begum.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others, Respondents

AFFIDAVIT

I, Hidayatullah Khattak, Advocate High Court as per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



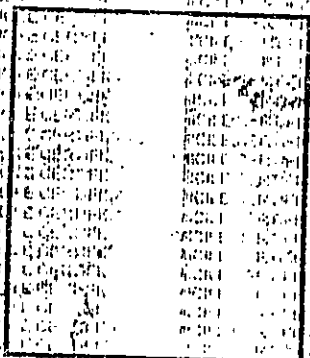
Hidayatullah Khattak
DEPONENT

5

Am - A

1

DOMICILE CERTIFICATE



I declare that I was born of parents who are permanently domiciled in N.W.F.P. having been born in this Province.

I was born at Karak City.

Name Noorshood Begum

Signature [Handwritten Signature]

Resident of Karak City.

Tehsil Karak

District Karak

Date 5/9/1998.

In pursuance to the declaration dated 5/9/1998.

by Noorshood Begum Sohrab D/C Gul Jannoo
Tehsil Karak District Karak

to the effect that he has been born of parents who are permanently domiciled in N.W.F.P. Province.

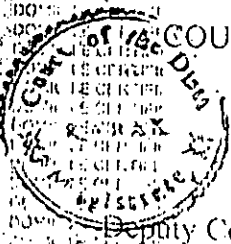
It is hereby certified that the said Noorshood Begum parents are permanent residents of N.W.F.P. Province having been born within it.

I have satisfied myself from own knowledge / by verification

through M.T. Karak that the above declaration is true and certify accordingly.

Given under my hand and that the seal of the Court this

5th day of Sep. 1998



Deputy Commissioner, Karak.

Magistrate 1st Class

[Handwritten Signature]

دھرونی جانی ہے نہ سماں نور سید بیلم دے تر مل: اوانے نر نر پیرا مری سکول آفتل کالونی
 ترک سے پیرا مری سے پاس کیا۔ یہ اور یہ موضع ترک تحصیل ترک ضلع ترک کے
 بنگلہ بٹی اور رہائش پدیر ہیں۔

تعمیراتی کارروائی کے لیے مسماں نور سید سے زمین کی خریداری
 کی گئی ہے جس کی قیمت 1000 روپے ہے۔
 اس کی رقم مسماں نور سید سے وصول کی گئی ہے۔

11/05/2015
 11/05/2015
 11/05/2015

5/1/88

مسماں نور سید
 صاحب
 11/05/2015

11/05/2015

S.No. 26314

(6)

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 110171



Board of Intermediate and Secondary Education Peshawar N.W.F. Pakistan

Secondary School Certificate Examination

SESSION 1998 - ANNUAL

(Humanities Group)

This is to Certify that Noorsheed Begum Son / Daughter of Gul Janoor
and a student of Govt: Girls Higher Secondary School, Karak has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1998 as a Regular
candidate. He / She obtained 470 Marks out of 850 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|--------------------|----------------------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Islamic Studies |
| 2. Urdu | 4. Pakistan Studies | 6. General Science | 8. Elements of H/Economics |

He / She has been awarded Grade D on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form October 8, 1981

Assil Secretary
Assil Secretary

Secretary
Secretary

This certificate is issued without alteration or erasure.

(7)

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE

Intermediate Examination Humanities Group Part - I

Session 19 99 (Annual)



Sr. No. 16477

Name Muhammad Sheeha B. 19/11/1999

Father's Name Asad Janoor

Roll No. 115379

SUBJECT	Total Number of marks allotted	F	MARKS OBTAINED	
			In Figures	In words
1. English-I	100		48	
2. Urdu-I	100		43	
3. Islamic Education	50		29	
4. <u>JS</u>	100		59	
5. <u>MA</u>	100		44	
6. <u>HA/E</u>	100		59	/
Total	550		282	

Note: Errors / omissions excepted

F: Failed in the paper(s)

Date: _____ 19 _____

[Signature]
Controller of Examination

Board of Intermediate & Secondary Education
PESHAWAR

Prepared by [Signature]

Checked by [Signature]

S.No. 65230

Roll No. 66027

Group. Humanities

8

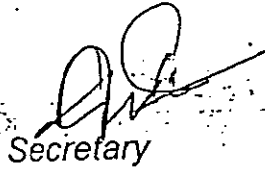
پشاور



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2000 - ANNUAL

This is to Certify that Noor Sheed Begum Daughter of Gul Janoor
and a student of Govt: Girls College, Karak Registered No. 64-B/GGHK-98
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May/June, 2000 as a Regular Candidate. She obtained 507 Marks out of 1100
and has been placed in Grade D Representing Fair. She has been awarded Grade C on the
basis of internal assessment by the institution concerned. The Examination was taken as a whole.


Asst. Secretary


Secretary

(9)

Board of Intermediate & Secondary Education PESHAWAR

DETAILED MARKS CERTIFICATE

Intermediate Examination Humanities Group
SESSION 10/2004 (Annual/Supplementary)



Sr No.

119227

Name

Noor Sheed Begum

Father's Name

Gul Janear

Roll No.

66027

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			73	/
2. Urdu	200			93	
3. Islamic Education	50			53	
4. Pakistan Studies	50				
5. <u>PH</u>	200			77	
6. <u>HPE</u>	200			102	
7. <u>IS</u>	200			109	
Total	1100			507-D	<i>Final checked</i>

Note: Errors/Omissions excepted.

Date 17/11/2004 19

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by

[Signature]

Checked By

10

Al-Farooq Islamic Open University
Dhaka



Serial No 151164

Certified that *Mr/Ms* NOOR SHEED BEGUM

Son/Daughter of GUL JANOOR


Registration No 00NKK0328

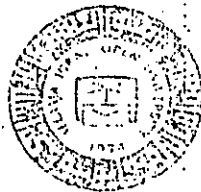
Roll No AD410334

Semester Spring 2011 *having met all the requirements under*
the semester system is this day awarded the degree of

Bachelor of Arts
Group - General

He/She has secured 59 *% marks*
and has been placed in C *grade*


CONTROLLER OF EXAMINATIONS




VICE-CHANCELLOR

Result declared on: February 27, 2012

Date of issue: August 11, 2012

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

11
Al-Salamah Bqbal Open University
Islamabad

Serial No 178948



Certified that *Mr/Ms* **NOORSHEED BEGUM**
Son/Daughter of **GUL JANOOR**
Registration No. **00 NKK 0328** *Roll No.* **J 6187347**
Semester **SPRING 2006** *having met all the requirements*
under the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured **55 %** *marks*
and has been placed in **C** *grade*



Result declared on: **January 19, 2007**

Date of issue: **July 16, 2007**

[Signature]

[Signature]
Controller of Examinations

[Signature]

Note: This certificate is issued without alteration/erasure.
The detail of courses is overleaf.

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
613	Principles of Education	62
614	Eudcational Psychology	52
615	School Organization & Management	44
616	School Community & Practical Arts	51
617	Teaching of Urdu	56
618	Teaching of Mathematics	52
619	Teaching of Science & Physical Education	47
620	Teaching of Islamiat & Social Studies	47
611	Practical Workshop & Teaching Practice	82

Total credit hours XXX

Obtained / Total marks 493 / 900

Total credits AIOU 5


Cumulative grade point aver.igu XXX

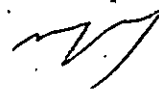
First semester: SPRING 2000

Final semester: SPRING 2006

Grading Scheme

80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail


Controller of Examinations



12

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



PROVISIONAL RESULT CARD

Serial No. 505078

Name NOOR SHEED BEGUM
Father's Name GUL JANDOR
Address ZAFAR AND BROTHERS SUGAR ATTA GE DEALAR
KARAK

Roll No. AP653355
Registration No. 00NKK0328
Final Semester SPR-2013

Tehsil KARAK
District KARAK

has successfully completed BACHELOR OF EDUCATION (B. ED)

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 12	0512	PERSPECTIVES OF EDUCATION	100	66
AUT- 12	0513	SCHOOL ORGANIZATION	100	57
AUT- 12	0514	EVALUATION, GUIDANCE & RESEARCH	100	69
AUT- 12	0511	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	67
AUT- 12	0651	ENGLISH (COMPULSORY)	100	68
AUT- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	69
SPR- 13	0517	TEACHING OF PAKISTAN STUDIES	100	57
SPR- 13	0654	TEACHING OF ISLAMICAT	100	61
SPR- 13	0655	WORKSHOP & TEACHING PRACTICE	100	85



CREDITS: 6

Total Marks / Obtained

900 / 599

Percentage / Grade

67 B

Result Declared on DECEMBER 26, 2013

Date of issue JANUARY 07, 2014

Controller of Examinations

Disclaimer: This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any privilege or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the final record of the university student.

13

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Serial No. A 1511

Name NOO SHEED BEGUM
Father's Name GUL JANOOR
Address

Roll No. AM659954
Registration No. 11NKK01592
Final Semester SPRING 2012

Tehsil KARAK
District KARAK
has successfully completed

Certificate of Teaching

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUTUMN 2011	631	DIMENSIONS IN EDUCATION	100	67
AUTUMN 2011	632	EDUCATIONAL PSYCHOLOGY	100	66
AUTUMN 2011	633	SCHOOL ORGANIZATION	100	75
SPRING 2012	634	ENGLISH AND ITS TEACHING	100	64
AUTUMN 2011	638	TEACHING STRATEGIES & EVALUATION	100	71
SPRING 2012	612	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	83
SPRING 2012	604	URDU LANGUAGE AND ITS TEACHING	100	67
SPRING 2012	605	SOCIAL STUDIES & ITS TEACHING	100	68
SPRING 2012	635	ISLAMIAT AND ITS TEACHING	100	66

Credits: 5

Total Marks / Obtained 300 227

Percentage / Grade 70 A

Result Declared on January 16, 2013

Date of issue April 28, 2013

Controller of Examinations

Disclaimer: This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

14

Allama Iqbal Open University Dahlanabad



Serial No. 200774

Certified that Mr. / Ms. NOORSHEED BEGUM

Son / Daughter of GUL JANOOR

Registration No: 00NKK0328

Roll No: AP653355

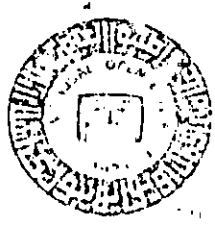
having successfully completed the prescribed requirements
in semester SPRING 2013 is awarded the degree of

Bachelor of Education (B.Ed)

He/She has secured 67 % marks and has been placed in B grade.

[Signature]

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: December 26, 2013

Date of Issue: June 16, 2014

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

(15)

OFFICE OF THE DY. DISTRICT OFFICER (FEMALE) ELEM: EDU: B.D.SHAH (KK)
PAY RELEASE ORDER.

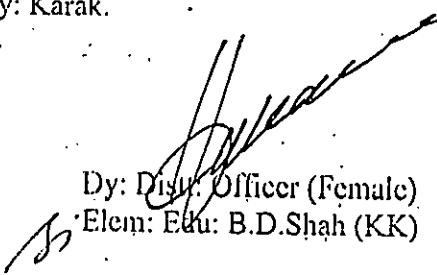
Consequent upon the verification of documents received from the concerned boards/university are duly verified in r/o Mst: Noorsheed Begum, PST GGPS Chunda khurram, the pay is hereby released w.e.f.01-12-2010 in the best interest of public service.

Sd/-
Dy: Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

Endst:No. 26-62/1File-PST

Dated B.D.Shah the. 24/12/2012.

- Copy of the above is to the:-
1. Executive Distt: Officer (E&SE) Karak.
 2. Dy: Distt: Officer (Female) Pry: Karak.
 3. Distt: Accounts Officer Karak.


Dy: Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

J. O. B.

Dated: Khurram the. 10/5/2012.

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

The Dy: Distt: Officer (Female)
Pry: B.D.Shah (KK)

RELEASE OF PAY

Reference your Office Endst:No.224-26/Pay. Service dated 18-06-2012 and
let. number bearing No. 120/Pay. Service dated 10-03-2012. Addressed to
you and copy thereof is enclosed.

It is stated that Miss. Noorshheed Begum was appointed as PST at GGHS
Khurram vide Executive Distt: Officer Endst: No.2679-85/AE-1/PST/Appnt: dated
Later on she was transferred to GGHS (Mag. Lawagar) (under control of (Dy:
Karak) vide Executive Distt: Officer 6850-58/AE-1/PST/P dated 08-11-2010
of all appointee's mistresses have been drawn upto 30-11-2010 including
Begum) later on the documents were sent to the authorities concerned for
hence the salaries of all the fresh appointee's were stopped due to awaiting of
of documents. As the Noorshheed Begum, was transferred to Karak Sub
e, the Dy: Distt: Officer (Female) Karak was informed not to draw the salary
stress due to awaiting of verified documents As the undersigned has
in charge of the post of Dy: Distt: Officer (Female) B.D.Shah on 02-05-2012.
uments of the mistress are verified and received from the agency concerned,
an release the salary of the mistress in the light of direction/instructions
ed by the Executive Distt: Officer (E&SE) Karak (Copy of the said
ions is lying in your Office).

ed in your own interest to issue release order of salary of those mistresses.
is has received verified in the best interest of public service and the service
red mistresses be sent to Dy: DO (Female) Pry: Karak.

er added that this is the whole story regarding stoppage of pay.

Sd/-

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

1
above submitted to the:-
istrict Officer (E&SE) Karak.
ficer (Female) Pry: Karak

Sd/-

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

(15)

OFFICE OF THE DY. DISTRICT OFFICER (FEMALE) ELEM: EDU: B.D.SHAH (KK)
PAY RELEASE ORDER.

Consequent upon the verification of documents received from the concerned boards/university are duly verified in r/o Mst: Noorsheed Begum, PST CGPS Chunda khurram, the pay is hereby released w.e.f.01-12-2010 in the best interest of public service.

Sd/-
Dy. Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

Endst.No. 266-697 File-PST

Dated B.D.Shah the 26/12 2012.

Copy of the above is to the:-

1. Executive Distt: Officer (E&SE) Karak.
2. Dy: Distt: Officer (Female) Pry: Karak.
3. Distt: Accounts Officer Karak.

Sd/-
Dy: Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

**BEFORE OF WORTHY CHAIRMAN SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

In the matter of
Service Appeal No. _____ /2019

Noor Sheed Begum.....Versus.....Govt. & others

**Application for addition of the "back
benefits relief" which has not been sought,
inadvertently, in the main service Appeal
prayer clause.**

Respectfully Sheweth:

1. That the captioned Service Appeal is pending adjudication before this Hon'ble Tribunal and fixed for final arguments today.
2. That inadvertently, the back benefits relief has not been sought in the main appeal which is ^{the} essential ^{the} and core relief of appellant.

It is, therefore most humbly requested that "back benefits" relief may please be added in the relief of the main service appeal of the appellant.

Appellant
Through


Hidayatullah Khattak
Advocate High Court

Dated 15.06.2019

erial No 1189

Roll No 12690

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION HYDERABAD
SINDH



MARKS CERTIFICATE

DETAILED MARKS CERTIFICATE

INTERMEDIATE AND SECONDARY EDUCATION (HUMANITIES GROUP)

Session 19 98 Annual /Supplementary

Name: Noor Sheed Begum Father's Name: Gul Janoor

F.A.
False
and
begum

SUBJECTS	MARKS				
	Subjects Marks	Obtained			Remarks
		Part-I	Part-II	Total	
1. English	200			130	<i>Handwritten signature</i> Seven hundred
2. Urdu	200			142	
3. Islamic Education	50			30	
4. Pakistan Studies	50			22	
5. <i>Phy</i>	200			151	
6. <i>Chem</i>	200			140	
7. <i>Bio.</i>	200			174	
Total :	<u>1100</u>			<u>789</u>	<i>Eighty nine</i>

INCLOSURE TO
J.P. College Hyderabad

Note: this Certificate is issued error and omission excepted. Total in words _____

Prepared by: *[Signature]* Checked by: *[Signature]*

[Signature]

Date: _____

Controller of Examinations

OFFICE OF THE DY. DISTRICT OFFICER (FEMALE) ELEM: EDU: B.D.SHAH (KK)
PAY RELEASE ORDER.

Consequent upon the verification of documents received from the concerned boards/university are duly verified in r/o Mst: Noorsheed Begum, PST GGPS Chunda khurram, the pay is hereby released w.e.01-12-2010 in the best interest of public service.

S.D./
Dy: Dist: Officer (Female)
Elem: Edu: B.D.Shah (KK)

Endst:No. 266-69/File-PST

Dated B.D.Shah the 24/12/2012 ✓

Copy of the above is to the:-
Executive Distt: Officer (E&ST) Karak.
Dy: Distt: Officer (Female) P/y: Karak.
Distt: Accounts Officer Karak.

- 1.
- 2.
- 3.

S.D./
Dy: Distt: Officer (Female)
Elem: Edu: B.D.Shah (KK)

No. _____

Dated Khurram the 10/07 2012.

From:-

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

To:-

The Dy: Distt: Officer (Female)
Pry: B.D.Shah (KK)

Subject:-

RELEASE OF PAY

Memo:-

Reference your Office Endst.No.201-20/Pay, Service dated 18-06-2012 and subsequent Ist: reminder bearing No.250/Pay, Service Book dated 03-07-2012 addressed to the under signed and copy there of to other.

It is stated that Miss. Noorshood Begum was appointed as PST at GGHS Chunda Khurram vide Executive Distt: Officer Endst: No.2679-85/AE-UPST/Apptt: dated 01-04-2009. Later on she was transferred to GGHS Shagi Lawagher (under control of (Dy: DO (F) Pry Karak) vide Executive Distt: Officer 6850-58/AE-II/PSI/P) dated 06-11-2010. The salary of all appointees mistresses have been drawn upto 30-11-2011 including (Munabed Begum) late on the documents were sent to the authorities concerned for verification, hence the salaries of all the fresh appointees were stopped due to awaiting of verification of documents. As the Noorshood Begum, was transferred to Karak sub Division hence, the Dy: Distt: Officer (Female) Karak was informed not to draw the salary of above mistress due to awaiting of verified documents. As the undersigned has relinquished the charge of the post of Dy: Distt: Officer (Female) B.D.Shah on 02-05-2012, now the documents of the mistress are verified and received from the agency concerned, you are directed to release the salary of the mistress in the light of direction/instructions already conveyed by the Executive Distt: Officer (E&SE) Karak (Copy of the said direction/instructions is lying in your Office).

It is added in your own interest to issue release order of salary of those mistresses, whose documents has received verified in the best interest of public service and the service books of transferred mistresses be sent to Dy: DO (Female) Pry: Karak.

It is further added that this is the whole story regarding stoppage of pay.

Javida Iqbal
Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

Endst:No. 5-6

Copy of the above submitted to the:-
Executive District Officer (E&SE) Karak
Dy: Distt: Officer (Female) Pry: Karak

Javida Iqbal
Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
GGHS Khurram (KK)

1: نام (اردو میں) نور شہد سکیم
 (انگریزی میں) Noor Shehad Scheme
 2: نام ولدیت (اردو میں) گل جانور
 (انگریزی میں) Gul Janwar
 3: قومی شناختی کارڈ نمبر 145-81-441876
 4: (A) ڈومیسائل کراچی (B) گاؤں کھنڈ کالونی کراچی (C) یونین کونسل صوفی ٹرڈ
 (D) صوبائی حلقہ PSC 40 (E) تحصیل کراچی (F) ضلع کراچی
 5: تاریخ پیدائش: 1982

6: تعلیمی قابلیت:

امتحان	سال پاس کردہ	نمبر	کل نمبر	بمطابق اشتہار Criteria کے تحت حاصل کردہ نمبر	دفتری امتحان کیلئے
میٹرک	1998	470			
ایف اے ایف ایس سی	2000	507			
بی اے ایل ایس سی		652			
ایم اے ایم ایس سی					
سندسٹریٹیکٹ PTC	2006	493			
نومل نمبر					

7. ادارے کا نام جہاں سے PTC کا امتحان پاس کیا ہے

دستخط امیدوار کا نام لکھ کر لے گا۔ 1700-5-5

تصدیق نامہ از ناظم متعلقہ یونین کونسل

تصدیق کی جاتی ہے کہ سبھی اسماہ نور شہد سکیم گاؤں کھنڈ کالونی کراچی یونین کونسل صوفی ٹرڈ کا مستقل رہائشی باشندہ ہے۔

نوٹ: فارم کے ساتھ درج ذیل سرٹیفکیٹس منسلک کرنا لازمی ہے۔

دستخط یونین کونسل

(۲) بی اے ایل ایس سی DMC کراچی کا پاس کیا ہے۔

DMC (۲) ایف اے ایف ایس سی بہہ DMC

DMC (۱) میٹرک بہہ DMC

(۶) ڈومیسائل سرٹیفکیٹ قومی شناختی کارڈ

DMC (۵) سندسٹریٹیکٹ بہہ DMC

DMC (۳) ایم اے ایم ایس سی بہہ DMC

اس کے علاوہ دیگر ڈگری / اسناد / سرٹیفکیٹ وغیرہ مثلاً CT / بی ایڈ / دینی اسناد / سرٹیفکیٹ وغیرہ لگانے کی زحمت نہ کریں۔

GG. No. 7105840

**Board of Intermediate & Secondary Education
PESHAWAR**

**DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)**

Session 1998 (Annual/Supplementary)

Name Noor sheed Begum

Father's Name Gul Janoor Roll No. 110171

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	75	Four hundred & seventy
2. Urdu	150	91	
3. Islamiyat Comp.	75	48	
4. Pakistan Studies	75	42	
5. Mathematics	100	54	
6. General Science	100	54	
7. EHE	100	52	
8. Gs	100	54	
Total	850	470	C

This Certificate is issued errors and omission excepted.

Prepared by: [Signature]

Checked by: [Signature]

Date 25/3/1998

[Signature]
Controller of Examinations
Board of Intermediate & Secondary Education
Peshawar

**Board of Intermediate & Secondary Education
PESHAWAR**

DETAILED MARKS CERTIFICATE
Intermediate Examination Humanities Group
SESSION 19 2002 (Annual/Supplementary)



Sr. No.

Name

119227 Noor Sheed Begum

Father's Name

Gul Janoar

Roll No.

66027

Subjects	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			73	/
2. Urdu	200			93	
3. Islamic Education	50			53	
4. Pakistan Studies	50				
5. <u>9H</u>	200			77	
6. <u>HP/E</u>	200			102	
7. <u>IS</u>	200			109	
Total	1100			507-D	<u>Final check</u> <u>Sevan 09</u>

Note : Errors/Omissions excepted.

Date

15 MAY 2000

19

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Prepared by

[Signature]

Checked By

[Signature]



S.No 023437

UNIVERSITY OF HYDERABAD

HYDERABAD (PAPER) DETAIL MARKS CERTIFICATE

Bachelor of Arts (B.A.) Part II Annual Examination 2000

Name: Noor Sheed Begum

Father's Name: Gul Janoor

FOCUS

Roll No 8822 N

Reg No 98-UID-3625

Division

Certified that the candidate secured the following marks and is placed in

SUBJECTS

Maximum Marks

MARKS OBTAINED

In Figure

In Words

English Compulsory

75

60

Sixty Only ✓

Political Science

75

55

Fifty Five ✓

Urdu

75

46

Forty Six ✓

Pak Studies

40

30

Thirty Only ✓

Part-I Marks

280

190

One Hundred and Ninety Five

Total

350

280

Three Hundred and Eighty Six

The examination was taken as a whole.

Result declared on 12-06-2000

Verified & Found Correct

[Signature]

Controller of Examinations,
University of Science and Technology

Controller of Examinations,
University of Hyderabad

No. _____

Dated Khurram on the 10/01/2012

From:-

Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
CGHS Khurram (KK)

To:-

The Dy: Distt: Officer (Female)
Pry: B.D.Shah (KK)

Subject:-

RELEASE OF PAY

Memo:-

Reference your Office Indst. Book of Pay, Service dated 16-06-2012 and subsequent Ist: reminder bearing No.250/Pay, Service Book dated 03-07-2012 addressed to the under signed and copy there of to other.

It is stated that Miss. Nourshad Begum was appointed as PSI at CGPS Chunda Khurram vide Executive Distt: Officer Indst: No.2679-85/AE-I/PSI/Apptt: dated 01-04-2009. Later on she was transferred to CGPS Shagi Lawagher (under control of (Dy: DO (F) Pry Karak) vide Executive Distt: Officer 0850-58/AE-I/PSI/01 dated 08-11-2011. The entry of all appointee's mistresses have been drawn upto 30-11-2011 including Nourshad Begum. But on the documents were sent to the authority concerned for verification; hence the salaries of all the fresh appointee's were stopped due to awaiting of verification of documents. As the Nourshad Begum was transferred to Karak Sub-Division hence, the Dy: Distt: Officer (Female) Karak was informed not to draw the salary of above mistress due to awaiting of verified documents. As the undersigned has relinquished the charge of the post of Dy: Distt: Officer (Female) B.D.Shah on 01-02-2012. If now the documents of the mistress are verified and received from the agency concerned, you in clear can release the salary of the mistress in the light of direction/instructions already conveyed by the Executive Distt: Officer (E&SE) Karak (Copy of the said direction/instructions is lying in your Office).

It is added in your own interest to issue release order of salary of those mistresses, whose documents has received verified in the best interest of public service and the service books of transferred mistresses be sent to Dy: DO (Female) Pry: Karak.

It is further added that this is the whole story regarding stoppage of pay.

Javida Iqbal
Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress,
CGHS Khurram (KK)

Indst: No. 5-6

Copy of the above submitted to the:-
Executive Distt: Officer (E&SE) Karak
Pry: Distt: Officer (Female) Pry: Karak

Javida Iqbal
Mst: Javida Iqbal,
Ex-Dy: Distt: Officer (Female)
B.D.Shah Now Headmistress
CGHS Khurram (KK)

