

14.07.2022

Learned counsel for the appellant present Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments on 01.09.2022 before S.B.

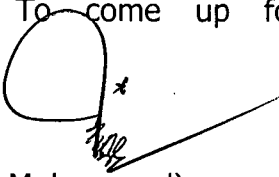


(MIAN MUHAMMAD)  
MEMBER (E)

01.09.2022

Appellant alongwith her counsel present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General alongwith Mr. Abdul Ghafoor, Superintendent for the respondents present.

Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Last opportunity is granted. To come up for reply/comments on 05.10.2022 before S.B.



(Mian Muhammad)  
Member (E)

25.04.2022

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant has been serving the respondent- department as PST (BS-12) since 03.05.2017 and is aggrieved of the impugned order dated 05.08.2021 when major penalty of removal from service was imposed upon her on the ground that she had acquired MSc. Pakistan Study Degree on the basis of result dated <sup>17.03.2017</sup> (after the closing date of advertisement) and claimed to have been issued on the basis of result declaration dated 06.09.2016 i.e before the closing date of advertisement. Her salary was stopped illegally for which she instituted service appeal in the Service Tribunal. However, during pendency of her service appeal, impugned order dated 05.08.2021 was issued. She submitted departmental appeal against the impugned order on 09.8.2021 which was not decided within the statutory period, where-after the service appeal was filed invoking Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. It was further argued that the appellant has not been treated according to law and rules because no proper and regular enquiry was conducted. Neither charge sheet/statement of allegations nor the opportunity of personal hearing had been provided to the appellant before imposition of the major penalty of removal from service. In absence of the fulfillment of codal formalities, the imposition of major penalty is not sustainable in the eyes of law as well as Article-4 and 25 of the Constitution .

The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 14.07.2022 before S.B.

R8.600/-  
Appellant Deposited  
Security & Process Fee  
28/4/22




(Mian Muhammad)  
Member(E)

Form- A

FORM OF ORDER SHEET

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

Case No.- 7870/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2021	<p>The appeal of <del>Mr</del> Memoona Asma resubmitted today by Mr. Zartaj Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	10.02.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>09/02/2022</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.04.2022 for the same as before.</p> <p style="text-align: right;"> Reader</p>

The appeal of Memoona Asma, PST, GGPS Saib Kohat received today i.e. on 08.12.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Annexure H attached with the appeal is illegible which may be replaced by legible/better one.
2. Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.

No. 2434 /S.T,

Dt. 08/12 /2021

  
REGISTRAR

SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Zartaj Anwar Adv. Pesh.

Respected sir,

Resubmitted today.

- ① Annexure "H" is attached legible.
- ② Certificate is given at the foot note of appeal.

Munshi  
Advocate

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 7870/2021

*Memoona Asma*, Primary School Teacher (PST) Government Girls  
Primary School, Siab Kohat.

(Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education, Khyber Pakhtunkhwa and others.

(Respondents)

**INDEX**

S. No.	Description of documents	Signature	Page No.
1	Memo of appeal +Affidavit		1 -5
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3	Copy of the CNIC	A	7
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5	Copies of the appointment order dated 03.05.2017 and charge report	C & D	18- 22
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7	Copy of the order sheet	F	28
8	Copy of the Service appeal	G	29- 33
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11	Other Documents		
12	Vakalatnama		39

Appellant

Through

**ZARTAJ ANWAR**  
Advocate High Court  
Office FR, 3 Forth  
Floor Bilour Plaza  
Peshawar Cantt.

Cell: 0331-9399185

Email: [Zartaj9@yahoo.com](mailto:Zartaj9@yahoo.com)

**BEFORE THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 7871 /2021

**Memoona Asma**, Primary School Teacher (PST) Government  
Girls Primary School, Siab Kohat.

(Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Kohat.
4. District Accounts Officer, Kohat

(Respondents)

**Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the order dated 05.08.2021 whereby the appellant was awarded the major penalty of Removal From Service and against which the appellant filed departmental appeal dated 09.08.2021, which is not yet responded despite the lapse of 90 days of statutory period.**

Prayer in appeal

**On acceptance of this appeal the order of Removal from service of the appellant dated 05.08.2021 may kindly be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits.**

Respectfully submitted,

1. That the appellant is the law abiding citizen and the permanent resident of the District Kohat. *(Copy of the CNIC is attached as annexure A).*

2. That the respondent department advertised various post including the post of Primary School Teacher (PST) BPS-12, through NTS, being fit and eligible the appellant applied for the said post after fulfilling all the legal and codal formalities, the appellant was called for the written test in which the appellant duly appeared, merit list was prepared in which the total score of the appellant was 94.5 and the name of the appellant was brought in the merit position for appointment. *(Copies of the educational documents are attached as annexure B)*
3. That the appellant was initially appointed as Primary School Teacher in Government Girls Primary School Siab Kohat vide office order dated 03.05.2017 and started her duty at the GGPS Siab Kohat. *(Copies of the appointment order dated 03.05.2017 and charge report are attached as Annexure C & D).*
4. That it is pertinent to mention here that ever since her appointment, the appellant has performed her duties as assigned, with great zeal and devotion without any complaint whatsoever regarding her performance.
5. That in the meanwhile one Mst Asma BiBi filed a writ petition 1572-P/2020, title Asma Bibi vs Govt of KPK, before the Honourable Peshawar High Court Peshawar, in which the petitioner challenge the appointment of the appellant. *(Copy of the Writ Petition is attached as annexure E).*
6. That the writ petition no 1572-P/2020 title Asma Bibi vs Govt of KPK, was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, despite of this the respondents are not releasing the salaries of the appellant which is illegal, unlawful and against the fundamental rights. *(Copy of the order sheet is attached as annexure F)*
7. That during the pendency of the writ petition no 1572-P/2020 title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the appellant from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the appellant still performing her duties. but astonishingly the respondents stopped the salary of the appellant without any

reason and justification against which appellant, feeling aggrieved the acts and omission of the respondent the appellant filed a Service Appeal No 4816/2021 before the Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar which still is pending for adjudication. *(Copy of the Service Appeal is attached as annexure G)*

8. That in the mean while the respondent department issued the impugned order dated 05.08.2021 whereby the appellant was awarded the major penalty of Removal From Service, *(Copy of the order dated 05.08.2021 is attached as annexure H)*
9. That being aggrieved from the illegal act of the respondents, the appellant filed a departmental appeal vide dated 09.08.2021, which is not yet responded by the respondents even after laps of the statutory period of 90 days, *(Copy of the departmental appeal is attached as annexure I).*
10. That the appellant prays for the acceptance of her appeal inter alia on the following grounds:

#### **GROUND OF SERVICE APPEAL**

- A. That the Appellant has not been treated in accordance with law and rules hence her rights secured and guaranteed under the law are badly violated.
- B. That the appellant was initially appointed as Primary School Teacher in Government Girls Primary School Siab Kohat vide office order dated 03.05.2017 and started her duty at the GGPS Siab Kohat.
- C. That since her appointment the appellant was performing her duties with great zeal and devotion to the entire satisfaction of her superiors without any complaint whatsoever regarding her performance.
- D. That in the meanwhile one Mst Asma BiBi filed a writ petition 1572-P/2020, title Asma Bibi vs Govt of KPK, before the Honourable Peshawar High Court Peshawar, in which the petitioner challenge the appointment of the appellant. The Writ Petition was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, but despite of this the



respondents stopped the salaries of the appellant, against which she filed Service Appeal No 4816/20 before the Honourable Service Tribunal Khyber Pakhtunkhwa Peshawar, which is still pending for adjudication.

- E. That without giving charge sheet, statement of allegation or show cause notice by the respondent department to the appellant, awarded the major penalty of Removal From Service which nullity in the eyes of law.
- F. That the appellant was appointed by the competent authority, she duly took over charge of her post and performed her duties since 2017 and have received salaries against her post thus valuable rights has been created in her favour and the same cannot be undone or snatched away illegally.
- G. That the appellant has been denied of her livelihood, which amounts to violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- H. That no proper procedure has been followed by the respondents by awarding the major Penalty of Removal From Service .
- I. That the appellant has not been provided proper opportunity of personal hearing thus she has been condemned unheard.
- J. That valuable rights has been occurred in shape of appointment and principle of locus poenitentiae has also occurred in favour of the petitioner as the order has been issued by the competent authority there is no such illegality or irregularity on the part of the petitioner.
- K. That the superior courts have a number of reported judgments held that in case of awarding major penalty of Removal from service regular procedure of holding inquiry cannot be dispensed with that too when the charges are denied by the employee
- L. That the appellant has never committed any act or omission which could be termed as misconduct. .
- M. That the Appellant seeks permission of this Honourable Tribunal to rely on additional grounds at the time of hearing of the appeal.

It is, therefore, humbly prayed that On acceptance of this appeal the order of Removal from service of the appellant dated 05.08.2021 may kindly be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits.

*Appellant*

Through

**ZARTAJ ANWAR**  
Advocate, Peshawar

&

**IMRAN KHAN**  
Advocate, Peshawar

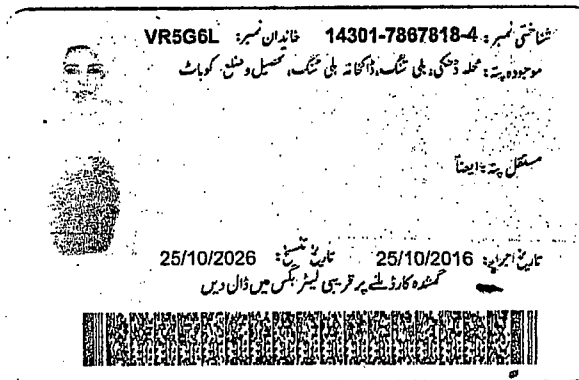
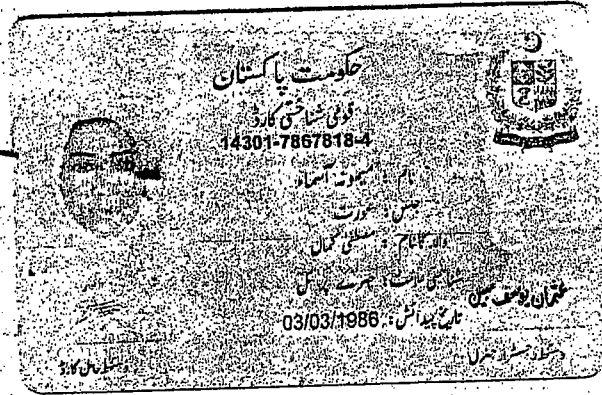
**AFFIDAVIT**

I, *Memoona Asma*, Primary School Teacher (PST) Government Girls Primary School, Siab Kohat, do hereby solemnly affirm and declare on oath that the contents of the above noted appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

*Deponent*

7

Amir:- A



18387

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



## PESHAWAR

### DETAILED MARKS CERTIFICATE

Secondary School Certificate Examination  
Session: 2002 (Annual)

Name: Maimoona AsmaFather's Name: Mustafa KamalRoll No 12809

Subject	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In-Words
1. English:	150	-	-	68	Sixty-Eight
2. Urdu	150	-	-	89	Eighty-Nine
3. Islamiyat (Comp)	75	46	-	46	Forty-Six
4. Pakistan Studies	75	40	-	40	Forty Only
5. New Rizvi	100	37	-	37	Thirty-Seven
6. G. Science	100	63	-	63	Sixty-Three
7. Elements Of H. Economics	100	62	-	62	Sixty-Two
8. Islamic Studies	100	73	-	73	Seventy-Three

Total: 850

478-C Four Hundred Seventy-Eight Only

Remarks

IS,EHE,

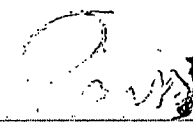
*Handwritten signature*  
 Maimoona Asma  
 18387-18  
 G.O.S Kohat

Checked By: \_\_\_\_\_

Date: 29-06-2002

Note: Error / Omission are excepted

Khaizer and BICANS Software Enterprise (KBSoft)

  
 Controller of Examinations

S.No. 236054

Roll No. 12809



**Board of Intermediate and Secondary Education**  
**Peshawar N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**  
**SESSION 2002 – ANNUAL**  
**(Humanities Group)**

*Asst. Secy*  
Peshawar  
GOVT. GIRLS HIGH SCHOOL  
KOHAT

This is to Certify that Maimoona Asma Son / Daughter of Mustafa Kamal  
and a student of Govt. Girls High School, Billitang, Kohat has passed the Secondary School Certificate  
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2002 as a Regular  
candidate. He / She obtained 478 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 Home Economics |

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

Date of birth according to admission form March 3, 1986

*Asst. Secy*  
Asstt Secretary

*Secy*  
Secretary

This certificate is issued without alteration or erasure.

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION KOHAT

## DETAILED MARKS CERTIFICATE Intermediate Examination Humanities Group



Sr.No. 16547


Part - II

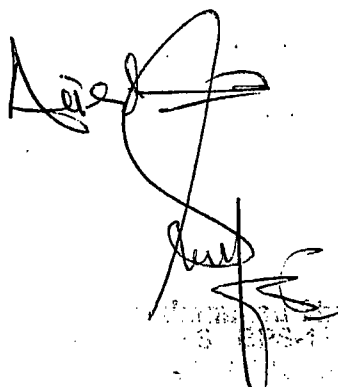
Session 200 h (Annual/Supplementary)Name Mamoona Asma.Father's Name Mustafa Kamal Roll No. 39438

SUBJECT	Subjects Marks	Marks Obtained			
		Part-I	Part-II	Total In	
				Figures	Words
1. English	200			73	
2. Urdu	200			122	
3. Islamic Education	50			66	
4. Pakistan Studies	50			98	
5. <u>1H.</u>	200			107	
6. <u>ci</u>	200			123	
7. <u>IS.</u>	200				
<b>Total</b>	<b>1100</b>			<b>589</b>	<b>2</b>

Note: Errors/Omissions excepted

Total Marks in Words Five H-7 C. g. j. k. l. m. n. o. p. q. r. s. t. u. v. w. x. y. z.Date 1/1Prepared by: [Signature]Checked by: [Signature]

  
 Controller of Examinations  
 Board of Intermediate & Secondary Education  
 KOHAT.

  
 Controller of Examinations  
 Board of Intermediate & Secondary Education  
 KOHAT.

S.No.KB 5457

Roll. No. 39438

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

11

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**



**KOHAT**  
(N.W.F.P. Pakistan)

**INTERMEDIATE EXAMINATION**

**FIJANITIES GROUP**  
**SESSION: 2004 (ANNUAL)**

THIS IS TO CERTIFY THAT Mamoona Asma

Son/Daughter of Mustafa Kamal

and a student of Govt Girls Higher Secondary School Babri Banda Kohat

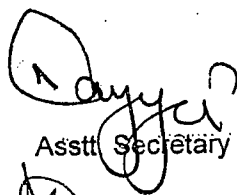
Registered No 9-BK/GBBK-2002 has passed the *Intermediate Examination*

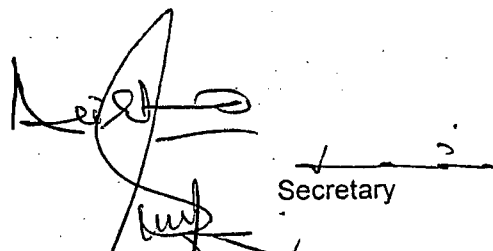
of the Board of Intermediate & Secondary Education, Kohat held in May, 2004

as a Regular candidate. He / She obtained 589 marks out of 1100 and has been

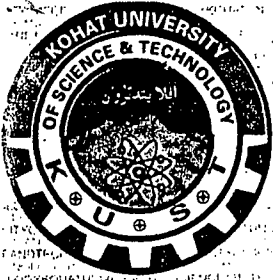
placed in C Grade Representing Good

The Examination was taken as a whole / in parts.

  
Asstt Secretary

  
Secretary

This certificate is issued without alteration of pressure.  
Muhammad Shafiq  
SS BPS-13  
Kohat



# Kohat University of Science & Technology, Kohat (Pakistan)

12

## Detailed Marks Certificate Bachelor of Arts (B.A) Part-II, Annual Examination, 2011

Name: Maimoona Asma  
Father's Name: Mustafa Kamal

Roll Number: 30149  
Registration Number: 2008-PCKU-271

It is certified that the candidate secured the following marks and has been placed in 2nd Division

SUBJECTS	Maximum Marks	MARKS OBTAINED	
		In Figures	In Words
Urdu Compulsory	75	30	Thirty
English	75	42	Forty-Two
Sample Studies	75	46	Forty-Six
Practical Studies	40	19	Nineteen
<b>Part-I Marks</b>	<b>285</b>	<b>176</b>	<b>One Hundred Seventy-Six</b>
<b>Total</b>	<b>550</b>	<b>313</b>	<b>Three Hundred Thirteen</b>

examination was taken in parts  
pass 40% marks in each subject (Written & Practical Separately) and  
marks in aggregate.

Result Declared on: 29-Aug-2011

**CONTROLLER OF EXAMINATIONS**  
Kohat University of Science and Technology  
Kohat, Pakistan.

Errors and omissions are subject to subsequent rectification.



Serial No. 006969

Roll No. 30149

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.

2008-PCKU-271

**Kohat University**  
of Science & Technology, Kohat  
(Pakistan)

Session ANNUAL, 2011

NAIMOONA ASMA

DAUGHTER

of

MUSTAFA KHAL

and a student

of DISTRICT KOHAT

having passed the prescribed

examination held in JUNE 20 11, is this day admitted by

**The Kohat University of Science & Technology, Kohat**

**to the Degree of**

**Bachelor of Arts**

**in the SECOND Division**

**The Examination was taken as a whole / in parts**

*[Handwritten signature and stamp of the Controller of Examinations]*

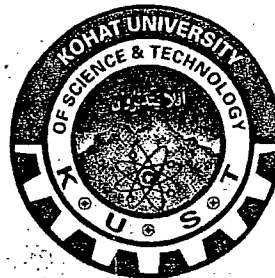
Controller of Examinations

Countersigned

*[Handwritten signature]*

Vice Chancellor

Result declared on AUGUST 29, 2011



Serial No.  
140792

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD  
PROVISIONAL RESULT CARD



Name MAIMOONA ASMA  
Fathers's Name MUSTAFA KAMAL  
Address D.O MUSTAFA KAMAL C.O ABDUL WAHAB HARD WAR  
E SERVICE BILLITANG P.O BILLITANG

Roll No. T645090  
Registration No. 06NKT0126  
Final Semester AUT- 2006

Tehsil KOHAT  
District KOHAT

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 06	0613	PRINCIPLES OF EDUCATION	100	69
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	63
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	67
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	67
AUT- 06	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	65
AUT- 06	0617	TEACHING OF URDU	100	68
AUT- 06	0618	TEACHING OF MATHEMATICS	100	66
AUT- 06	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	71
AUT- 06	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	74



*Muhammad Iftiq*  
SS B.S. &  
G.C.H.S. Kohat

CREDITS: 5

Total Marks / Obtained 900 / 610

Result Declared on SEPTEMBER 20, 2007

Percentage / Grade 68 B

Date of issue SEPTEMBER 25, 2007

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.

*[Signature]*  
Controller of Examinations

15

Allama Iqbal Open University  
Islamabad



Serial No. 246732

Certified that *Mr/Ms* **MAIMOONA ASMA**  
*Son/Daughter of* **MUSTAFA KAMAL**  
*Registration No* **06NKT0126** *Roll No* **T645090**  
*Semester* **AUTUMN 2006** *having met all the requirements under*  
*the semester system is this day awarded the*

## Primary Teaching Certificate

*He/She has secured* **68 %** *marks*  
*and has been placed in* **B** *grade*

Result declared on:

*Muhammad Ali*  
*SS*  
**September 29, 2007**  
*S Kohat*



*Ali*

*Muhammad*  
Controller of Examinations

Date of issue:

**October 10, 2016**

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	69
614	EDUCATIONAL PSYCHOLOGY	63
615	SCHOOL ORGANIZATION & MANAGEMENT	67
616	SCHOOL COMMUNITY & PRACTICAL ARTS	67
617	TEACHING OF URDU	68
618	TEACHING OF MATHEMATICS	66
619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	71
620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	74
611	PRACTICAL WORKSHOP & TEACHING PRACTICE	65

Total credit hours **XXX**

Total credits AIUO **5**

First 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

Obtained / Total marks **610 / 900**

Cumulative grade point average **XXX**

Final semester **AUTUMN 2006**

*M. H. Khan*  
Controller of Examinations

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



## PROVISIONAL RESULT CARD

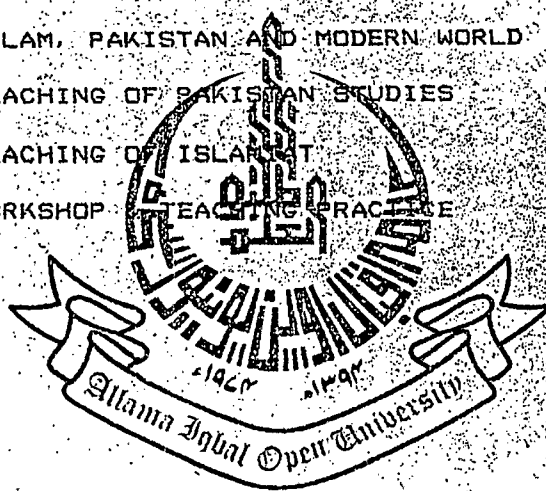
Serial No. 505676

Name MAIMOONA ASMA  
 Father's Name MUSTAFA KAMAL  
 Address D. O MUSTAFA KAMAL C. O ABDUL WAHAB HARD  
 WAR E SERVICE BILLITANG P. O BILLITANG  
 Tehsil KOHAT  
 District KOHAT  
 has successfully completed BACHELOR OF EDUCATION (B. ED)

Roll No. AP643426  
 Registration No. 06NKTO126  
 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	75
AUT- 12	0513	SCHOOL ORGANIZATION	100	68
AUT- 12	0514	EVALUATION, GUIDANCE & RESEARCH	100	56
AUT- 12	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	73
AUT- 12	0651	ENGLISH (COMPULSORY)	100	81
AUT- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	75
SPR- 13	0517	TEACHING OF PAKISTAN STUDIES	100	63
SPR- 13	0654	TEACHING OF ISLAMAT	100	64
SPR- 13	0655	WORKSHOP TEACHING PRACTICE	100	92



*(Signature)*

Muhammad Atiq  
 SS BPS-13

CREDITS: 6

Total Marks / Obtained

900 / 647

Result Declared on DECEMBER 26, 2013

Percentage / Grade

72 A

Date of issue JANUARY 07, 2014

*(Signature)*

**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.

# Allama Iqbal Open University Islamabad



251126

Serial No. \_\_\_\_\_

Certified that Mr. / Ms. **MAIMOONA ASMA**

Son / Daughter of **MUSTAFA KAMAL**

Registration No: **06NKT0126** Roll No: **AP643426**

having successfully completed the prescribed requirements



in semester **SPRING 2013** is awarded the degree of

## Bachelor of Education (B.Ed)

He/She has secured **72** % marks and has been placed in **A** grade.

  
CONTROLLER OF EXAMINATIONS



  
VICE-CHANCELLOR  
  
Muhammad Shafiq  
SS 8/5-18  
G.C.H.S Kohat

Result declared on: **December 26, 2013**

Date of Issue: **January 06, 2017**

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

**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**PROVISIONAL RESULT CARD** 17



Serial No 62655 Roll No. BA586178  
 Name MAIMOONA ASMA Registration No. 06NKT0126  
 Final Semester SPR-2016  
 Father's Name MUSTAFA KAMAL  
 Address ABDUL WAHAB HARD WARE SERVICE MANID BILLI  
 TANG  
 Tehsil KOHAT  
 District KOHAT



has successfully completed **MASTER OF SCIENCE**  
**(PAKISTAN STUDIES)**

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 14	0538	GENESIS OF PAKISTAN MOVEMENT	100	66
AUT- 14	4655	GEOGRAPHY OF PAKISTAN-I	100	69
AUT- 14	4656	GEOGRAPHY OF PAKISTAN-II	100	56
AUT- 14	4657	PAKISTANI LANGUAGES & LITERATURE-I	100	61
AUT- 14	4659	PAKISTANI LANGUAGES & LITERATURE-II	100	56
SPR- 15	0537	IDEOLOGICAL FOUNDATIONS OF PAKISTAN	100	55
SPK- 15	4659	ECONOMIC DEVELOPMENT IN PAKISTAN-I	100	66
SPR- 15	4660	ECONOMIC DEVELOPMENT IN PAKISTAN-II	100	64
SPR- 15	4661	FOREIGN POLICY OF PAKISTAN-I	100	71
SPR- 15	4662	FOREIGN POLICY OF PAKISTAN-II	100	70
AUT- 15	0541	SOCIAL CHANGE	100	61
AUT- 15	4663	PAKISTANI SOCIETY & CULTURE-I	100	59
AUT- 15	4664	PAKISTANI SOCIETY & CULTURE-II	100	66
AUT- 15	4665	RESEARCH METHODS-I	100	56
AUT- 15	4666	RESEARCH METHODS-II	100	60
SPR- 16	0545	POLITICAL PARTIES & PRESSURE GROUPS IN	100	69
SPR- 16	4667	POLITICAL AND CONSTITUTIONAL	100	62
SPR- 16	4668	POLITICAL AND CONSTITUTIONAL	100	63
SPR- 16	4669	SOCIAL THEORY-I	100	65
SPR- 16	4670	SOCIAL THEORY-II	100	65

*(Signature)*  
 Muhammad Waqif  
 SS, SSC, BSC  
 GCHS Kohat

Credit Hours 60  
 Result Declared on MARCH 17, 2017  
 Date of Issue APRIL 11, 2017

Total Marks/Obtained 2000 / 1260  
 Percentage/Grade 63 / B

*(Signature)*  
**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.

**APPOINTMENT**

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Primary School Teacher (PST) School based in BPS- (Rs.11140-800-35140) @ Rs. 11140/- P.M fixed plus usual allowances as admissible under the rules on adhoc basis Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

S#	Name & Father Name	CNIC No	UC	Score	Name of School where posted	Remarks	
1	Miss Noor Barkat D/O Barkat Ali	14301-8898517-4	Alizai	102.61	GGPS No.2 Bositang	AVP	
2	Miss Tabassum D/O Naimat Ali	14301-3094579-8		100.39	GGPS Khowaja Khizar	AVP	
3	Anila Ambar D/O Abdul Waheed Khan	14301-9979361-6	Bahadar kot	128.42	GGPS No.1 Sheikhhan	AVP	
4	Sidra-tul-Muntaha D/O Faqir Muhammad	14301-9535061-8		120.78	GGPS Kamar Mela	AVP	
5	Safia Bibi D/O M. Razzaq	14301-5556184-8	Bilitang	120.22	GGPS Dhok Akbar Jan.	AVP	
6	Noor-e-Atiqah D/O Inayat ullah	14301-0423569-4		115.61	GGPS Siab	AVP	
7	Nazia Bibi D/O Muhammad Raziq	14301-5682377-4		103.08	GGPS Dhok Akbar Khan	AVP	
8	Maimoona Humayun D/O Muhammad Humayun	42101-0920331-0		100.60	GGPS Nari Kak	AVP	
9	Madiha Shahab D/O Shahab ud Din	14301-7909757-8		96.94	GGPS Gandiyali Payan	AVP	
10	Noor-ul-Saba D/O Muhammad Naeem Khan	14301-6792411-4		95.13	GGPS Siab	AVP	
11	Maimoona Asma D/O Mustafa Kamal	14301-7887818-4		94.95	GGPS Siab	AVP	
12	Mehwish Resham Gul D/O Resham Gul	14301-8706917-2		93.97	GGPS Gandiyali Payan	AVP	
13	Sara Shabir D/O Shabir Ahmad	14301-9813150-0		91.32	GGPS Gandiyali Payan	AVP	
14	Urooba Shahab D/O Shahab ud Din	14301-6185796-6		91.04	GGPS Gandiyali Payan	AVP	
15	Nagina D/O Riaz ullah	14301-8791867-0		90.69	GGPS Dhok Jat Siab	AVP	
16	Javaria Noor D/O Inayat ullah	14301-5092119-6		90.12	GGPS Gandiyali Payan	AVP	
17	Fozia Bibi D/O Fazal Rahim	14301-9433575-2		Chorlaki	110.45	GGPS Jabbar	AVP
18	Shomaila D/O Farid Gul	14301-7125995-0		Dhoda	119.06	GGPS Afridi Banda	AVP
19	Abida Bibi D/O Anees Khan	14301-5863296-6		Gumbat	116.92	GGCMS Ghurzai Payan	AVP
20	Sabra D/O Noor-ul-Haq	14301-9454757-6	101.60		GGCMS Ghurzai Payan	AVP	
21	Ghazala Bibi D/O Muhammad Zaman	14301-9905509-6	101.14		GGCMS Ghurzai Payan	AVP	
22	Nabeela Gul D/O Muhammad Nazir	14301-9739618-8	98.95		GGPS Tulang Jadeed	AVP	
23	Romana Bibi D/O Mughal Khan	14301-7833662-4	98.89		GGPS Tulang Jadeed	AVP	
24	Ayesha Busra D/O Banaras Khan	14301-5280265-8	Khushal Garh	104.38	GGPS Parshai	AVP	
25	Sidra Munaza D/O Noshawan Khattak	54400-8775423-8		100.56	GGPS Parshai	AVP	
26	Amina Kalsoom D/O Muhammad Khurshid	14301-6976809-2		98.53	GGPS Kamar	AVP	
27	Abida Parveen D/O Abdul Waheed	14301-3239261-6		98.11	GGPS Resi Banda	AVP	
28	Umm-e-Salma D/O Rehmat ullah	14301-9399087-0		87.74	GGPS Kamar	AVP	

N. J. A.



S#	Name & Father Name	CNIC No	UC	Score	Name of School where posted	Remarks
29	Faima Majid D/O Abdul Majeed	14301-1170311-6	Muhammad Zai	108.43 Adj UC	GGCMS Banda Parachgan	AVP
30	Hifza Farhat D/O Farhat Raheem	14301-8067121-2		107.09 Adj UC	GGPS No.1 Muhammad Zai	AVP
31	Sadia Bibi D/O Ghulam Hassan	14301-8108832-8		101.55 Adj UC	GGPS No.1 Muhammad Zai	AVP
32	Arifa Urooj D/O Taj-ud-din	14301-5009407-6		101.48 Adj UC	GGCMS Banda Parachgan	AVP
33	Nafeesa Bibi D/O Muhammad Hussan	14301-4954159-4		100.17	GGCMS Banda Parachgan	AVP
34	Humaira Khan D/O Nawab Khan	14301-3068683-4		96.52	GGPS No.1 Muhammad Zai	AVP
35	Kalsoom Bibi D/O Iqbal Muhammad	14301-0532418-6		96.50	GGCMS Banda Parachgan	AVP
36	Basmina D/O Farash Khan	14301-5131962-8		94.86	GGPS No.1 Muhammad Zai	AVP
37	Mehwish Abdur Rehman D/O Abdur Rehman	14301-6311155-8		89.62 Adj UC	GGPS No.1 Muhammad Zai <i>Part B</i>	AVP
38	Amina Naz D/O Badshah Gul	14301-8118276-2		74.94	GGPS No. 2 Muhammad Zai	AVP
39	Zarnaz D/O Zarmin Khan	4200-7423363-8	Nasrat Khel	144.27	GGPS Jabbi	AVP
40	Dilnaz D/O Zarmin Khan	4200-5548682-0		136.24	GGPS Jabbi	AVP
41	Haleema Ismat D/O Abdur Rashid	14301-0957988-4		111.6	GGPS No.1 Ambar Banda	AVP
42	Taiba Naz D/O Muhammad Moeen Ud din	14301-8605045-8		98.00	GGPS No.2 Ambar Banda	AVP
43	Kainat Ayaz D/O Muhammad Ayaz	14301-2102550-6	Shahpur	100.37	GGPS Aslam Abad	AVP
44	Gulnaz D/O Misree Khan	17201-1890955-0		93.98	GGPS Fateh Khan Khel	AVP
45	Dilshad D/O Muhammad Hanif	14301-7141996-4		93.58	GGPS Mir Bash Khel	AVP
46	Shabana Akhtar D/O Hameed ur Rehman	14301-4351473-6		84.57	GGPS Mir Bash Khel	AVP
47	Aisha Shabir D/O Shabir ur Rehman	14301-1823421-0		76.69	GGPS Lal Garhi	AVP
48	Saira Bano D/O Ghulam Muslim	14301-0491561-2	Sherkot	94.00	GGPS No.1 Chikar Kot Bala	AVP
49	Najma Bibi D/O Ahmad Hayat	14301-6976574-4	Togh Bala-I	121.70	GGPS No.1 Togh Bala (Part-A)	AVP
50	Warda Ghufuran D/O Ghufuran Gul	14301-8941870-0		100.30	GGPS No.1 Togh Payan	AVP
51	Miss Zeenat Yasmin D/O Wali Muhammad	38302-3089613-0	Urban-II	121.39	GGPS No.2 Sangher	AVP
52	Madiha Iram D/O Sultan Ahmad	14301-8866320-4		115.68	GGPS No.2 Garhi Risaldar	AVP
53	Miss Kinza Wafa D/O Gulzar Ahmad	14301-8403221-6		114.80	GGPS No.2 Sangher	AVP
54	Miss Sana Zaman D/O Zaman Khan	14301-0694520-8		108.57	GGPS No.1 Garhi Risaldar	AVP
55	Zahida Bibi D/O Khalid Zaman	14301-6214867-0	Urban-III	114.63	GGPS No.5 Jungle Khel	AVP
56	Mehnaz Bibi D/O Bahadur Shah	14301-1937232-6	Urban-IV	129.69	GGPS Malang abad	AVP
57	Maryam D/O Saadat Qayum	14301-2317241-4	Urban-VI	97.71	GGPS No.2 Baqizai	AVP
58	Sehrish Khan D/O Javed Khan	14301-4317816-0		95.00	GGPS Shaheed Road	AVP
59	Miss Rubab Hassan D/O Ghulam Hassan	17301-9324313-8	Usterzai	127.38	GGPS Essa Khel Kachai	AVP
60	Miss Sanam Sakina D/O Abu Talib	14301-1986983-8		123.05	GGPS Hassan Khel Kachai	AVP
61	Zuhra Abdul Qayyum D/O Abdul Qayyum	14301-4206785-8	Z.S.Alla Dad	128.62	GGPS Banda Zamir Gul	AVP
62	Sajda Zareef D/O Muhammad Zarif	34302-7438896-6		97.37	GGPS Dhok Islam Din	AVP
63	Salma Khaliq D/O Abdul Khaliq	14301-1188113-2		94.39 Adj UC	GGPS Dhok Alif Gul	AVP

S#	Name & Father Name	CNIC No	UC	Score	Name of School where posted	Remarks
64	Shazia D/O Khaista Badshah	14301-6039473-4	Z.S.Alla Dad	93.63	GGPS Darsha Khel	AVP
65	Tabassum D/O Hafiz ur Rehman	14301-6282105-6		93.25 Adj UC	GGPS Dhok Ibrahim	AVP
66	Naheeda Farid D/O Farid Gul	14301-7126508-8		85.45 Adj UC	GGPS Dhok Sparli Gul	AVP
67	Fehmida Jalil D/O Jalil Khan	14301-4266625-6		82.92 Adj UC	GGPS Dhok Islam Din	AVP
68	Jawaria Noshin D/O Rana Gul	42401-3376176-8		75.26	GGPS Shadipur	AVP
69	Nadia Mehmood D/O Sultan Mehmood	37104-1227126-6		70.89	GGPS Dhok Noor Afzal	AVP
70	Tabassum D/O Rauf Khan	14302-8341181-0	Lachi (Rural)	104.69	GGPS Terawal Banda (Lachi)	AVP
71	Apnan Bibi D/O Gul Janan	14301-1901197-8		104.27	GGPS Chanda Fateh Khan (Lachi)	AVP
72	Razia Nasir Khan D/O Nasir Khan	35201-6855490-4		88.31	GGPS Ali Kach (Lachi)	AVP
73	Riffat Naz D/O Ashraf Zada	14302-9129088-4		86.72	GGPS, Wali (Lachi)	AVP
74	Iqbal Bano D/O Maqsood Khan	14302-0588465-3		76.47	GGPS, Ghurzandi, (Lachi)	AVP
75	Najma Bibi D/O Rashid Gul	14301-9105130-0	Mandoori	111.41	GGPS, Inzar Wala Banda (Lachi)	AVP
76	Chand Bibi D/O Syed Ghulam Hussain Shah	14301-3674994-4	Sudal	104.79	GGPS, Shewaki (Lachi)	AVP
77	Asma Bibi D/O Siddiq Ur Rehman	14301-1932883-8		109.15	GGPS, Hawasi Banda (Lachi)	AVP
78	Samina Naz D/O Siddiq Ur Rehman	14302-6342013-0		108.22	GGPS Chishana Ghunda (Lachi)	AVP
79	Shadaba Farid D/O Muhammad Farid	14301-4451848-8		105.54	GGPS, Kata Kani (Lachi)	AVP
80	Mussarat Shaheen D/O Faqir Shah	14301-5106434-6	SIDara (Rural-II)	106.57	GGPS, Grawan (Lachi)	AVP
81	Shazia Shamim D/O Amanullah Khan	14302-2933832-6		96.07	GGPS, Rukwan (Lachi)	AVP
82	Najma Shaheen D/O Umar Khan	14301-3736457-0		92.73	GGPS, Zer Koi (Lachi)	AVP
83	Shahida Bibi D/O Ahmad Din	14301-0522280-8		92.17	GGPS, Janak (Lachi)	AVP
<b>Minority Quota</b>						
1	Sabita Laxmi D/O Urjan Das	14301-0743351-0	Urban-V	97.12	GGPS Aziz Abad, Ghurzai Payan	AVP
2	Nayyab D/O Nasir Masih	14301-0597767-0	Urban-I	90.00	GGPS NO.3 Muhammad Zai	AVP
3	Radhna Kanwal D/O Dhayan Chand	14301-9197129-8	Urban-I	76.91	GGPS No.2 Kharmatoo	AVP
<b>Disabled Quota</b>						
1	Ayesha Ashraf D/O Muhammad Ashraf	14301-6931070-8	Urban-V	113.24	GGPS Wish Dhal Behzadi	AVP

### Terms & Conditions

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. They should not be handed over charge if She exceeds 35 years or below 18 years of age.
5. Appointment is subject to the condition that the certificate, documents, CNIC & Domicile must be verified from the concerned authorities by the DDO (concerned). If anyone found producing bogus/fake Certificate(s)/ Document(s) will be reported to the law enforcing agencies for further action.

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6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
  7. Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that her/their certificates / domicile /CNIC are verified.
  8. She/they should join her post within 15 days of the issuance of this notification. In case of failure to join her/their post within 15 days of the issuance of this notification, her/ their appointment will expire automatically and no subsequent appeal etc shall be entertained.
  9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
  10. Before handing over charge She / they will sign an agreement with the department, otherwise this order will not be valid.
  11. She/they will be governed by such rules and regulations as may be issued from time to time by the Govt.
  12. Her / their services shall be terminated at any time, in case her performance is found unsatisfactory during her / their contract period. In case of misconduct, she /they shall be preceded under the rules framed from time to time.
  13. Her / their appointment is made on School based, She/they will have to serve at the place of posting, and her / their service is not transferable to any other station.
  14. Before handing over charge once again her /their document may be checked if she / they has/have not the required qualifications she / they may not be handed over charge.
  15. If anyone candidate with fake document(s) / low score has been appointed erroneously, her / their appointment order would be withdrawn since the day of issuance in the best interest of the entitled/ right position holder candidate(s).

(Rizwana Liaqat)  
District Education Officer  
(Female) Kohat

Endst: No.2792-2886 / File PST Apptt: (2017)

Dated Kohat the 03/05/2017.

Copy forwarded for information and necessary action to the: -

1. District Controller of Accounts Kohat.
2. SDEO(F) Kohat & Lachi.
3. Official Concerned.
4. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
5. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
6. M/File

Umar Hayat

*Allest*  
*Ali*  
Superintendent  
o/o District Education Officer  
(Female) Kohat

*[Signature]*  
District Education Officer  
(Female) Kohat

مورخہ: 05 مئی 2017

چارچ رپورٹ

22  
خط و کتابت نمبر "ANNEX D"

1. بحوالہ آرڈر نمبر (2017) PST April (2017) Endst No 2792-2886/فائل 03 مئی 2017 آڈٹ سٹرکٹ ایجوکیشن آفیسر (زنانہ) کوہاٹ۔
- 2۔ مسماۃ میمونہ آسماء قومی شناختی کارڈ نمبر 4-7867878-14301 ساکن بلی ٹنگ ہمراہ آرڈر مذکورہ بالا نے آج مورخہ 05 مئی 2017 نے قبل از دوپہر بوقت 0900 بجے سکول ہذا گورنمنٹ گرلز پرائمری سکول سیاب کوہاٹ میں آکر اپنے عہدے PST کا چارج سنبھال لیا۔

مورخہ: 05 مئی 2017

Head Teacher  
G.G.P.S. Sialkot

دستخط چارج دہندہ  
NRBha  
ہیڈ ٹیچر گورنمنٹ گرلز پرائمری سکول سیاب  
05-05-17

مورخہ: 05 مئی 2017

دستخط چارج گرہندہ  
میونہ آسماء دختر مصطفیٰ کمال PST

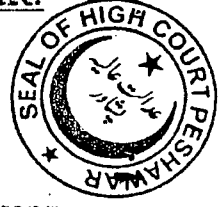
23  
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27

ANNEXURE-1 E

**BEFORE PESHAWAR HIGH COURT, PESHAWAR.**

WP No. 2447/2017



**Asma Bibi D/O Muhammad Afzal Khan**  
R/O Mohallah New Abadi Union Council Billatang,  
Tehsil Tangi, District Kohat.

..... Petitioner

Versus

1. Govt. of K.P.K., through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
  2. Director Elementary & Secondary Education K.P.K., Directorate of Education of KPK, GT Road, Peshawar.
  3. District Education Officer (female) (Elementary & Secondary Education, District Kohat.
  4. Deputy District Officer (F) Primary (E & SE) Kohat.
  5. Regional Director NTS, Regional Office Rahatabad Colony, near Pakistan Forest Institute, Peshawar.
  6. Mamoon Asma D/O Mustafa Kamal, Primary School Teacher, GGPS, Siab, Billatang, Kohat.
  7. Mehwish Resham Gul D/O Resham Gul, Primary School Teacher, GGPS, Gandyali Payan, Billatang, Kohat.
  8. Javaria Noor D/O Inayat Ullah, Primary School Teacher, GGPS, Gandyali Payan, Billatang, Kohat.
- ..... Respondents

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

**RESPECTFULLY SHEWETH:**

That the Petitioner is permanent residents of the Union Council Billatang Mohallah New Abadi, Tehsil & District Kohat.

(Copy of Domicile attached as Annexure-A)

**ATTESTED**  
**EXAMINER**  
Peshawar High Court

WP2447-2017-Asma-Bibi-VS-Govt-KP-Full

06 JUN 2017

FILED TO  
Deputy Registrar

2. That the Petitioner is master degree holder and has done CT & MTC from the Allama Iqbal Open University Islamabad.

(Copies are attached as Annexure- B & C)

3. That the respondent No. 3 advertised some post of PSTs in a daily Newspaper in which all the terms and conditions were elaborately mentioned.

(Copy of advertisement is attached as Annexure-D)

4. That the Petitioner, being qualified for the post of Primary School Teacher (PST), applied for five schools according to the prescribed procedure. After going through the process and procedure (NTS), the merit list was drafted by Respondent No.5, in which the Petitioner was shown on merit according to the score for the Government Girls Primary Schools for selected schools except on GGPS Siab, of Union Council Billatang.

(Merit lists are attached as Annexure-E & F)

5. That the Petitioner time and again approached the respondents through written application but in vain and the Petitioner was orally informed that the merit list has been prepared under the undue and illegal pressure of the political authorities and Respondent No.3 as they wanted to adjust/appoint their own favorable persons instead of the Petitioner and other competent candidates.

6. That after the finalization of merit list the Respondent No.6, 7 & 8 were appointed, besides the facts that respondent No.7 is not the permanent resident of Union Council Billatang and according to rules and regulations / advertisement she is not entitled for appointment in petitioner union council. Secondly Respondent No.6 name is not figure in NTS result / merit list. Thirdly Respondent No.8 marks are less than petitioner. The petitioner filed departmental appeals before Respondent No.3 & 5 but of no avail and against the rules and their own advertisement final merit list has been prepared and the respondents No. 3 & 4 issued appointment orders respondents

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 WP2447-2017-  
 Deputy Registrar  
 06 JUN 2017  
 ATTESTED  
 EXAMINER  
 Peshawar High Court

No.6 to 8 smashing the legal and fundamental right of appointment of the petitioner for her personal benefit.

(Impugned appointment order is attached as annexure-G)

7. That, aggrieved by the actions/conducts of the respondents, and having no other adequate and efficacious remedy, the Petitioner do invoke the extra ordinary constitutional jurisdiction of this August Court, inter alia, on the following grounds:

**GROUND:**

a) That action of respondents and the drafting the impugned merit lists by respondents No. 3 to 5 are based on mala fide, political pressure, and against the principle of Natural justice and the Fundamental Rights as enshrined in the Constitution of Pakistan, hence liable to be struck down.

b) That the impugned actions taken by the respondents No. 3 to 5 are in utter disregard of the Constitution of Pakistan so as to defeat the cardinal Principle of equity. Hence, issuance of writ to undo the illegal, unconstitutional action and merit list as prayed for here and above.

c) That the petitioner on better position on merit list and permanent resident of Union Council Billatang while the Respondent No.6 to 8 are missing all there qualification / qualities, hence, in this scenario the Petitioner is entitle to be appointed but the acts of the respondents, is violative of Article 4, 25 & 27 of the constitution as it, on its face, floatingly, snack of unsavory backdrop creating a jumping board for their blue eyed.

d) That the Petitioner, being a deserving candidate, was not considered till date besides on the top of the merit lists and intentionally ignored, which act of the Respondents is illegal, void-ab-initio, without jurisdiction, in excess of

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WP2447-2017/3783/BI/VS-Govt-KP-Full

ATTESTED

EXAMINER

Peshawar High Court

06 JUN 2017

jurisdiction and result of ultra vires, hence liable to be declared as such.

- e) That this conduct of the Respondents has not only enhanced the agonies of the petitioner, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on their part which needs to be judicially handled.
- f) That the Petitioner successfully go through whole process of NTS and interview, but not considering by the respondents, intends to stop the eligible candidates, like Petitioner, from appointment against the vacant posts, and the respondents mala fidely ignored the Petitioner for their financial benefit and opportunity to political personalities to adjust / appoint their own blue eyed.
- g) That the Petitioner has gone through a long and painful exercise of the appointment procedure and the Petitioner has the right to be appointed being on the top position in the merit list, but still a conspiracy is going on to deprive the Petitioner from her right of appointment.
- h) That the Petitioner has got a constitutional right to be treated as according to the law. She has the right to be appointed while the respondents by an unlawful discriminatory act ignore the Petitioner and give opportunity to others for appointments, which is against the norms of justice.
- i) That the Petitioner, being qualified most senior deserving Candidates, are getting over-aged soon for all types of appointments. On the contrary, the Respondents, without keeping in mind this factum and without any legal justification, playing their illegal and unlawful games and ignore the Petitioners. In such a situation the rights of the Petitioners are safe guarded in the constitution, hence this Writ Petition.

FILED TODAY

Deputy Registrar.

WP2447-2017-Asma-Bibi-VS-Govt-KP-Full

06 JUN 2017

ATTESTED

EXAMINER  
Peshawar High Court



27 31

- j) That such practice of the respondents will encourage the political authorities to get involved themselves into the appointment/posting and transfer matters of the civil servants in future, which has been very strictly prohibited by the apex courts including the Supreme Court of Pakistan.
- k) That the Petitioner has been discriminated without any just and reasonable cause and thereby offending the fundamental rights of the Petitioners as provided by the constitution of 1973.
- l) That the Petitioners reserves rights to advance other points at the time of hearing this petition.

**IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE ABOVE SUBMISSIONS THE INSTANT WRIT PETITION MAY GRACIOUSLY BE ACCEPTED AND THE PETITIONER MAY KINDLY BE APPOINTED ACCORDING TO THE MERIT LIST.**

**Interim Relief:**

**IT IS, FURTHER, PRAYED THAT THE APPOINTMENT ORDER OF RESPONDENTS NO. 6 TO 8 MAY KINDLY BE SUSPENDED TILL THE FINAL DISPOSAL OF THIS WRIT PETITION.**

PETITIONER  
Through  
Asif Ali Shah  
&  
Bilal Khan Khatt  
Advocate High Court,  
Peshawar

**Certificate**

Certified that no Writ Petition has earlier been filed by the PETITIONERS on the above subject before this Honourable Court.

Advocate

**List of Books**

- 1. Constitution of Islamic Republic of Pakistan, 1973.
- 2. Any other law books as per needs

Advocate

**ATTESTED**  
**EXAMINER**  
Peshawar High Court

**FILED TODAY**  
Deputy Registrar

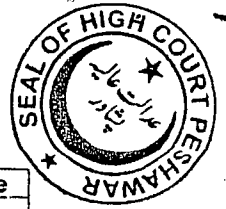
06 JUL 2017

28

ANNEX F

**PESHAWAR HIGH COURT, PESHAWAR.**

**FORM 'A'**  
**FORM OF ORDER SHEET**



Date of order.	Order or other proceedings with the order of the Judge
24.02.2021	<p><b><u>W.P.No.2447-P of 2017.</u></b></p> <p><b>Present:</b> Nemo for the petitioner.</p> <p>Mr.Muhammad Riaz, AAG for the Provincial Government.</p> <p>Mr.Zia-ur-Rehman, advocate for the respondent No.6.</p> <p>-----</p> <p><b><u>LAL JAN KHATTAK, J.-</u></b> Despite date by court, neither the petitioner nor her counsel is in attendance.</p> <p>Dismissed in default.</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p>

No. 22486

Date of Presentation of Application 3/3/2021

No of Pages 69

Copying fee 941

Total 941

Date of Preparation of Copy 4/3/2021

Date of Delivery of Copy 4/3/2021

Received By [Signature]

*[Signature]*

DECLINED TO BE TRUE COPY

EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 87 of  
The Qanun-e-Shahadat Order 1984

04 MAR 2021

1 29

ASMA: 9

**BEFORE THE KHYBER PAKHTUNKWA  
SERVICE TRIBUNAL PESHAWAR**

Appeal No. \_\_\_\_\_/2021

*Memoona Asma*, Primary School Teacher (PST) Government  
Girls Primary School, Siab Kohat.

(Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Kohat.
4. District Accounts Officer, Kohat

(Respondents)

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against not releasing the salary of the appellant w.e.f October 2018 till date and onwards, the appellant is still performing her duties, and against which the departmental appeal dated 16.12.2020, which is not yet responded despite the lapse of 90 days statutory period.

Prayer in appeal

On acceptance of this appeal the respondents may kindly be directed to release the salaries of the appellant w.e.f October 2018, till date and onward as the petitioner till date regularly performing her duties, further the reluctance on the part of the respondents by not releasing the monthly salaries of the appellant is against the law and against the fundamental rights secured & guaranteed under the Constitution of Islamic Republic of Pakistan 1973, thus she is entitled for salaries with all back benefits and arrears,

Respectfully submitted,

1. That the appellant is the law abiding citizen and the permanent resident of the District Kohat. *(Copy of the CNIC is attached as annexure A).*
2. That the respondent department advertised various post including the post of Primary School Teacher (PST) BPS-12 through NTS, being fit and eligible the appellant applied for the said post after fulfilling all the legal and codal formalities, the appellant was called for the written test in which the appellant duly appeared, merit list was prepared in which the total score of the appellant was 94.5 and the name of the appellant was brought in the merit position for appointment. *(Copies of the educational documents are attached as annexure B)*
3. That the appellant was initially appointed as Primary School Teacher in Government Girls Primary School Siab Kohat vide office order dated 03.05.2017 and started her duty at the GGPS Siab Kohat. *(Copies of the appointment order dated 03.05.2017 and charge report are attached as Annexure C & D).*
4. That it is pertinent to mention here that ever since her appointment, the appellant has performed her duties as assigned, with great zeal and devotion without any complaint whatsoever regarding her performance.
5. That in the meanwhile one Mst Asma BiBi filed a writ petition *2447 P/2017* title Asma Bibi vs Govt of KPK, before the Honourable Peshawar High Court Peshawar, in which the petitioner challenge the appointment of the appellant. *(Copy of the Writ Petition is attached as annexure E).*
6. That during the pendency of the writ petition no *2447 P/2017* title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the appellant from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the appellant still performing her duties. but astonishingly the respondents stopped the salary of the appellant without any reason and justification.

7. That the writ petition no *2447-P/2012* title Asma Bibi vs Govt of KPK, was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, despite of this the respondents are not releasing the salaries of the appellant which is illegal, unlawful and against the fundamental rights. *(Copy of the order sheet is attached as annexure F).*
8. That being aggrieved from the illegal act of the respondents, the appellant filed a departmental appeal on 16.12.2020, which is not yet responded by the respondents even after laps of the statutory period of 90 days, the respondents while processing the case of the appellant, admits that the appellant performing her duties regularly, *(Copy of the departmental appeal and letter dated 10.02.2021 are attached as annexure G & H).*
9. That the appellant prays for the acceptance of her appeal inter alia on the following grounds:

**GROUND OF SERVICE APPEAL**

- A. That the appellant has not been treated in accordance with law, hence her rights secured and guaranteed under the law are badly violated.
  - B. That the appellant has never been proceeded against, nor any charge sheet or show cause notice has ever been served upon her, moreover the services of the appellant has not been terminated thus she is entitled for the release of her salary and also entitled for back benefits.
  - C. That withholding of salary amounts to punishment albeit without any Charge Sheet or Show Cause Notice, salary of the appellant has been stopped without any reason and justification.
10. That during the pendency of the writ petition no 1572-P/2020 title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the appellant from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the appellant still performing her duties. but astonishingly the respondents stopped the salary of the appellant without any reason and justification.

- D. That the writ petition no 1572-P/2020 title Asma Bibi vs Govt of KPK, was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, despite of this the respondents are not releasing the salaries of the appellant which is illegal, unlawful and against the fundamental rights
- E. That the appellant has been denied of her livelihood, which amounts to violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- F. That the appellant was appointed by the competent authority, she duly took over charge of her post and performed her duties since 2017 and have received salaries against her post thus valuable rights has been created in her favour and the same cannot be undone or snatched away illegally.
- G. That the appellant is continuously approaching the concerned authorities for releasing of her salaries, but the respondents turned a deaf ear.
- H. That not releasing salary of the appellant is also violation of section 4 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, besides violation of her fundamental rights guaranteed and secured to her under the Constitution of Pakistan, 1973.
- I. That the appellant throughout agitated the matter of the release of her salary and continuously approached the Respondent department, however her salary has not been released till date.
- J. That the appellant belongs to a poor family and has a large family dependent upon her, moreover the appellant have no other source of income, due to the withholding of her salary her whole family is thus suffering.
- K. That the appellant seeks permission of this Honourable court to rely on additional grounds at the time of hearing of the appeal.

*It is therefore prayed that On acceptance of this appeal the respondents may kindly be directed to release the salaries of the appellant w.e.f October 2018, till date and onward as the petitioner till date regularly performing her duties, further the reluctance on the part of the respondents by not releasing the monthly salaries of the appellant is against the law and against the fundamental rights secured & guaranteed under the Constitution of Islamic Republic of Pakistan 1973, thus she is entitled for salaries with all back benefits and arrears.*

*Appellant*

Through

*Zartaj Anwar*  
ZARTAJ ANWAR  
Advocate, Peshawar

&

IMRAN KHAN  
Advocate, Peshawar

**AFFIDAVIT**

I, *Memoona Asma*, Primary School Teacher (PST) Government Girls Primary School, Siab Kohat, do hereby solemnly affirm and declare on oath that the contents of the above noted appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

*Deponent*

*MP3 61-2887818-61*

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Approved. H



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHAT



**NOTIFICATION:**

WHERE AS, Mst. Mamoonia Asma D/O Musatfa Kamal has got appointed Vide this office Endst No.2792-2886/file PST Appnt:(2017) dated 03.05.2017 as PST BPS-12 at GGPS Siab District Kohat by temping the date of declaration of result in MSc Pak study degree.

WHERE AS the above named teacher was awarded marks of MSc Pak Study Degree. The degree submitted by the teacher concerned was showing result declaration dated 06.09.2016 (Before the closing date of advertisement)

WHERE AS a complainant submitted the photo copy of MSc Pak Study Degree of Mamoonia Asma showing result declaration as 17.03.2017 (After the closing date of advertisement)

WHERE AS both the degree i.e with result declaration dated 06.09.2016 and 17.03.2017 were sent to ARU Islamabad vide registered mail for verification and both were verified.

WHERE AS, both the degrees were re-verified through special messenger i.e SDEO (F) Kohat and degree with declaration dated 06.09.2016 was disowned.

WHERE AS, inquiry committee was constituted Vide this office No.11578-82 dated 04.08.2018 and the committee categorically recommended the penalty of "Removal from service" for accused teacher.

WHERE AS, Show cause Notice was issued vide No.3392-93 dated 04.03.2019 and statement of allegation and charge sheet was also served upon the accused teacher but she failed to submit either written reply or presenting her self for personal hearing.

WHERE AS, the accused teacher Mst. Mamoonia Asma was again informed Vide this office No 5481 Dated 19/07.2021 to submit written reply of the show cause and ensure her presence for personal hearing before the undersigned on 30/07.2021 but she failed to appear before competent authority and instead her 11th forged and temping the date of declaration of result degree of MSc Pak study, presented on occasion of PST appointment.

Therefore, the under signed in capacity of competent authority, is absolutely agreed with the recommendation of inquiry committee, and keeping in view available material on record placed in file, in exercise of power conferred upon me, impose major penalty of "Removal from Service" within the ambit of E & D Rule 2011 Section 4(b)(iii) ab initio.

*Sd/-*  
District Education Officer  
(Female) Kohat

Dated 05/08 2021

Endst No 4389-95 PF Mamoonia Asma

- Copies of the above is forwarded to
1. To the IAS, Khyber Pakhtunkhwa, Peshawar
  2. DSO FMS Kohat
  3. SDO D.I Kohat
  4. District Account Officer Kohat
  5. PSII GGPS Siab Kohat

Mst. Mamoonia Asma D/O Musatfa Kamal RO Bilfataj District Kohat

*A. S. Aslam*  
District Education Officer  
(Female) Kohat



**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHAT**

**NOTIFICATION:**

**WHEREAS**, Mst Mamoonna Asma D/o Mustafa Kamal has got appointed vide this office Endst No 792-2886/file PST Apptt;(2017) dated 03.05.2017 as PST BPS-12 at GGHS Siab District Kohat by tempering the date of declaration of result in MSc Pak Study degree.

**WHEREAS** the above named teacher was awarded marks of MSc Pak study Degree. The degree submitted by the teacher concerned was showing result declaration dated 06.09.2016 (Before the closing date of advertisement)

**WHEREAS** a complainant submitted the photo copy of MSc Pak Study Degree of Mamoonna Asma showing result declaration as 17.03.2017 (After the closing date of advertisement)

**WHEREAS** both the degree i.e with result declaration dated 06.09.2016 and 17.03.2017 was sent to AIOU Islamabad vide registered mail for verification and both were verified.

**WHEREAS** both the degrees were re-verified through special messenger i.e SDEO (F) Kohat and degree with declaration dated 06.09.2016 was disowned.

**WHEREAS** inquiry committee was constituted vide this office No 11578-82 dated 04.08.2018 and the committee categorically recommended the penalty of "Removal from Service" for Accused teacher.

**WHEREAS** Show cause notice was issued vide No 3392-93 dated 04.03.2019 and statement of allegation and charge sheet was also served upon the Accused teacher but she failed to submit either written reply or presenting herself for personal hearing.

**WHEREAS** the Accused teacher Mst Mamoonna Asma was again informed vide this office No 5383 Dated 19.07.2021 to submit written reply of the show cause and ensure here presence for personal hearing before the undersigned on 30.07.2021 but she failed to appear before competent authority (sic) forgery and tempering the date of declaration of result degree of MSc Pak Study, presented on the occasion of PST appointment.

Therefore, the undersigned in capacity of competent authority is absolutely agreed with the recommendation of inquiry committee and keeping in view available material on record placed in file, in exercise of power conferred upon me, impose major penalty of "Removal from Service" within the ambit of E&D Rule 2011 Section 4(b)(iii) ab initio.

**District Education Officer  
(Female) Kohat**

Endst No 4389-95 PF Mamoonna Asma

Dated 05.08.2021

35

Answer I

To,

The Secretary,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa,  
Peshawar,

Subject: **DEPARTMENTAL APPEAL, AGAINST THE ORDER DATED 05.08.2021, WHEREBY THE UNDERSIGNED HAS BEEN AWARDED THE MAJOR PENALTY OF REMOVAL FROM SERVICE.**

Prayer in departmental appeal:

**ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED 05.08.2021, MAY PLEASE BE SET ASIDE AND THE UNDERSIGNED MAY KINDLY BE REINSTATED INTO SERVICE WITH ALL BACK BENEFITS.**

Respected Sir,

The undersigned very humbly submits the following few lines for your kind and sympathetic consideration:

1. That the respondent department advertised various post including the post of Primary School Teacher (PST) BPS-12 through NTS, being fit and eligible the undersigned applied for the said post after fulfilling all the legal and codal formalities, the undersigned was called for the written test in which the undersigned duly appeared, merit list was prepared in which the total score of the undersigned was 94.5 and the name of the undersigned was brought in the merit position for appointment.
2. That the undersigned was initially appointed as Primary School Teacher in Government Girls Primary School Siab Kohat vide office order dated 03.05.2017 and started her duty at the GGPS Siab Kohat.

3. That it is pertinent to mention here that ever since her appointment, the undersigned has performed her duties as assigned, with great zeal and devotion without any complaint whatsoever regarding her performance.
4. That in the meanwhile one Mst Asma BiBi filed a writ petition 1572-P/2020, title Asma Bibi vs Govt of KPK, before the Honourable Peshawar High Court Peshawar, in which the petitioner challenge the appointment of the appellant.
5. That during the pendency of the writ petition no 1572-P/2020 title Asma Bibi vs Govt of KPK, there is no such order issued by the honourable court while restraining the undersigned from performing her duties neither passed any order regarding stoppage of salary, furthermore the respondent admitting that the undersigned still performing her duties. but astonishingly the respondents stopped the salary of the undersigned without any reason and justification.
6. That the writ petition no 1572-P/2020 title Asma Bibi vs Govt of KPK, was dismissed by the Honourable Peshawar High Court Peshawar in non-Prosecution/Default, which was later on restored by the honourable Peshawar High Court Peshawar in which next date of hearing is fixed 30.09.2021.
7. That the respondent department twice conducted the inquiry through which I duly appeared but none of the time the inquiry was conducted nor my attendance was marked , as the inquiry officer was not in attendance, but quite illegally with all these facts my salary was stopped and malafidely shown me absent which I duly reported to DEO (F) (Miss Rizwana Liaqat).but all these circumstance was not taken into consideration and lastly served me with a letter dated 19.07.2021 through registered mail by alleging that I did not replied to the show cause notice which never served upon me.
8. That in response to the letter dated 19.07.2021, my sister namely samina naz submitted an application to DEO (F) Miss Rizwana Liaqat, that her sister has not feeling well along with medical prescription of Doctor, that to arrange an alternate date to appeared//personal hearing and submit reply of show cause notice but she was informed that the worthy DEO is busy/in meeting with Commissioner Kohat and cannot take the reply of the said show

cause nor we can arrange an alternate date of personal hearing and refused to mark any sort of attendance on behalf of the undersigned.

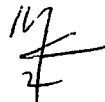
9. That without taking into consideration the request of the undersigned and in violation of all the rules law on the subject matter while conducting a fair and transparent de-novo inquiry, charge sheet along with statement of allegation and show cause notice and importantly no chance of personal hearing and all of sudden in violation of all this procedure issued the impugned order of Removal from Service dated 05.08.2021.
10. That the impugned Removal from Service order is illegal, unlawful, against the rules hence liable to be set aside inter alia on the following grounds

#### GROUND OF DEPARTMENTAL APPEAL

- A. That the undersigned has not been treated in accordance with law, hence her rights secured and guaranteed under the law are badly violated.
- B. That no proper procedure as prescribed under the Government Servants (E & D) Rules, 1973, has been adhered to before imposing the penalty of Removal from Service upon the appelland, neither any notice has been properly served upon her, nor she has been allowed proper opportunity to defend herself, thus penalty so imposed is liable to be set aside.
- C. That the undersigned has not been allowed proper opportunity of personal hearing before awarding her the penalty, thus the undersigned has been condemned unheard.
- D. That the respondent department twice conducted the inquiry through which I duly appeared but none of the time the inquiry was conducted nor my attendance was marked, as the inquiry officer was not in attendance, but quite illegally with all these facts my salary was stopped and malafidely shown me absent which I duly reported to DEO (F) (Miss Rizwana Liaqat).but all these circumstance was not taken into consideration and lastly served me with a letter dated 19.07.2021 through registered mail

- by alleging that I did not replied to the show cause notice which never served upon me.
- E. That the impugned order is very harsh and does not commensurate with the facts and circumstances of the case as the only charge of absence from duty has been leveled against the appellant, hence the impugned order passed against the undersigned is not maintainable in the eye of law.
- F. That the impugned order is void ab-initio, illegal, unlawful, arbitrary and having no legal effects against the rights of the appellant.
- G. That the undersigned has never committed any act or omission which could be termed as misconduct, albeit she has been awarded the penalty.
- H. That the undersigned has at her credit a long and spotless service of about 4 years, however it was not considered while awarding her the major penalty of Removal from Service.
- I. That the penalty imposed upon the undersigned is too harsh and is liable to be set aside.
- J. That the undersigned is jobless since her illegal Removal from Service.

It is, therefore, prayed that on acceptance of this departmental appeal the orders dated 05.08.2021 may please be set aside and the undersigned may please be reinstated in service with full back wages and benefits of service.

  
Memoona Asma

PST GGPS Siab Kohat

Dated 9/8 /2021

**POWER OF ATTORNEY**

In the Court of KPIC Social Tribunal Peshawar  
Memona Asma

} For  
} Plaintiff  
} Appellant  
} Petitioner  
} Complainant

**VERSUS**

Govt of KP & others  
} Defendant  
} Respondent  
} Accused  
}

Appal/Revision/Suit/Application/Petition/Case No. \_\_\_\_\_ of \_\_\_\_\_  
Fixed for \_\_\_\_\_

I/W. the undersigned, do hereby nominate and appoint

**ZARAJ ANWAR & IMRAN KHAN ADVOCATES**, my true and lawful attorney, for me in my same and on my behalf to appear at Pk to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so. any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

**AND** to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

**AND** I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

**PROVIDED** always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

**IN WITNESS** whereof I/we have hereto signed at \_\_\_\_\_  
the \_\_\_\_\_ day to \_\_\_\_\_ the year \_\_\_\_\_  
Executant/Executants \_\_\_\_\_  
Accepted subject to the terms regarding fee \_\_\_\_\_

**IMRAN KHAN**  
Advocate High Court  
Mob: 0345-9090648

**ZARAJ ANWAR**  
Advocate High Courts  
ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT  
FR-3, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt  
Mobile-0331-9399185  
BC-10-9851  
CNIC: 17301-1610454-5

**“B”**

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

*SB*

No.

*Recd*

Appeal No. *7876* of 20 *21*

*Memoona Asma*

Appellant/Petitioner

Versus

*Through Secy EGSE KPK Peshawar*

Respondent

Respondent No. *(13)*

Notice to: *DEO (Female) Kohat*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....*14/07/2022*.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

✓

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....*24/6*.....

Day of.....*June*.....20 *22*

*For Reply*

**Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.**

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

"B"

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

SB

No.

Recd

Appeal No. 7870 of 2021

Memoona Asma Appellant/Petitioner

Versus

Through Secy EGSE KIK Peshawar Respondent

Respondent No. 13

Notice to: — DEO (Female) Kohat

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....14/07/2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is <sup>✓</sup>attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....24/6.....

Day of.....June.....2022

For Reply

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.



in Case No. While making any correspondence:  
attendance in the court are the same list of the High Court except on days and observed holidays.

Perjury:

for / 60/11

2006

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214

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11/11/11

DEO (Karnal) Koyal

Washed in 2006 for hospital

(3)

and (Karnal)

0787

20

12

for

"B"

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

No.

Recd

SB

Appeal No. 7870 of 2021

Memoona Asma

Appellant/Petitioner

Through Secy EGSE <sup>Versus</sup> KPK Peshawar Respondent

Respondent No. 14

Notice to: -

District Accounts Officer, Kohat

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 14/07/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~  
office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 24/7

Day of June 20 22

For Reply

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

**“B”**

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

No. *Ref* *7870* *SE*  
 Appeal No. .... of 20 *21*  
*Memona Asma* ..... Appellant/Petitioner  
 Through *Sayy Ezz SE* *Versus* *KPK Peshawar* ..... Respondent  
 Respondent No. .... *(4)*

Notice to: — *District Accounts Officer, Kohat*

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~  
 office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....  
 Day of.....*June*.....20 *22*

*For Reply*

Registrar,  
 Khyber Pakhtunkhwa Service Tribunal,  
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
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