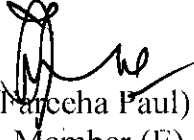


05.09.2022

Petitioner alongwith counsel present. Mr. Kabir Ullah Khattak, Additional Advocate General alongwith Abdul Jamil, Litigation Officer for respondents present.

Representative of the respondent department submitted corrigendum Endst: No. 5897/G/P-File dated 03.09.2022, wherein the grievance of the petitioner has been redressed, therefore, the instant execution petition is disposed off. File be consigned to record room.

Announced.  
05.09.2022

  
(Farceha Paul)  
Member (E)

19<sup>th</sup> April, 2022

Counsel for the petitioner present. Notices be issued to the respondents for the date fixed. To come up for implementation report on 07.06.2022 before S.B. Original file be also requisitioned.



Chairman

07.06.2022

Nemo for the parties.

Muhammad Adeel Butt, learned Additional Advocate General is absent.

Both the parties be put on notice with direction to respondents to submit proper implementation report on 15.07.2022 before S.B.

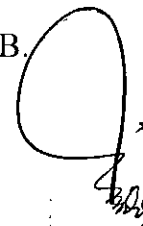


(Rozina Rehman)  
Member (J)

15.07.2022

Junior of learned counsel for the petitioner present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Implementation report not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of implementation report. Adjourned. To come up for implementation report on 05.09.202 before S.B.

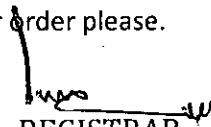




(MIAN MUHAMMAD)  
MEMBER(E)

Form- A  
FORM OF ORDER SHEET

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

Execution Petition No. 45/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	14.01.2022	<p>The execution petition of Mst. Nazia Begum submitted today by Mr. Javed Ali Asghar Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This execution petition be put up before S. Bench at Peshawar on <u>18/02/2022</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 19.04.2022 for the same as before.</p> <p style="text-align: right;"> Reader</p>
2-	18.02.2022	

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Implementation No. 45 of 2022  
In Appeal No.371/2019

Mst: Nazia Begum EX-CT ... Petitioner/ Appellant

**VERSUS**

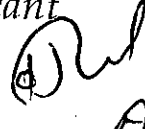
Government of Khyber Pakhtunkhwa through  
Secretary K.P Peshawar and others

... .. Respondents

**Index**

S.No.	Description of documents	Annexure	Pages
1-	Application for implementation		1-4
2-	Affidavit		5
3-	Copies of Judgment dated 12/02/2020	A	6-9
4-	Application for implementation and order dated 07/06/2021	B	10-20
5-	Copy of service of the appellant	C	21-32
6-	Copy of grounds of appeal of the applicant / petitioner		33-39
7-	Wakalat Nama	In original	40

Dated 10/11/2021

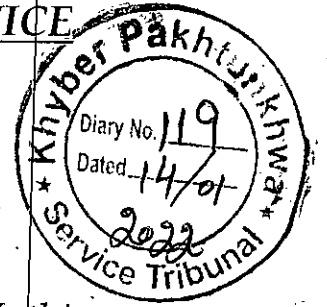
Applicant  
Through 

Javed Ali Asghar  
Advocate,  
High Court Peshawar

①

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

Implementation No. 45 of 2022  
In Appeal No.371/2019



Mst: Nazia Begum EX-CT at GGMS Jarai, Hathiyan,  
Tehsil Takht Bhai District Mardan

..... **Petitioner/ Appellant**

**VERSUS**

- 1) Government of Khyber Pakhtunkhwa through Secretary <sup>Case</sup> K.P Peshawar.
- 2) Director Elementary & Secondary Education, GT Road, Peshawar.
- 3) District Education Officer Female, Elementary & Secondary Education, Mardan

..... **Respondents**

**APPLICATION FOR IMPLEMENTATION**  
**OF JUDGMENT DATED 12/02/2020 IN**  
**APPEAL NO.371/2019**

Respectfully Sheweth:

- 1- That the above noted appeal was pending adjudication in this Hon'ble Tribunal and was decided on 12/02/2020 passed by this Hon'ble Tribunal. (Copy of order is annexed).
- 2- That the petitioner / appellant filed an application for implementation of the above noted decision vide an application No.135/2020 whereas the said

application is disposed off on 07/06/2021 on the ground that the respondent No.3 representative Namely Noor Zaman Khan Khattak, and stated that the order of this Hon'ble Tribunal is implemented and the report was submitted, and instant execution application was consigned to the record room. (Copy of application and order dated 07/06/2021 are annexed).

3- That respondent No.3 made entry in the Service Book on 03/03/2021 only promoted to the post of SCT BPS-16 but she was not promoted from the date of notification vide dated 23/09/2017 Endst No.9628-31, the Hon'ble Tribunal order was not comply as per the judgment passed in appeal No.371/2019

4- That vide judgment and order dated 12/02/2020, of this Hon'ble Tribunal was not complied by the respondent No.3 and made entry in the Service book from the date 03/03/2021 and promoted to the BPS-16 as SCT, whereas the order of this Hon'ble Tribunal to the respondent in his judgment the appellant be promoted as per prayed, the appellant prayed in her appeal that the appellant be promoted from 23/09/2017 Endst No.9628-31. But the

respondents made manipulation only to the extent posted in Government Girls Higher Secondary School Hathiyar Mardian ~~near~~<sup>way</sup> she was awarded her back benefit as per her prayed. (Copy of ground of prayer of appellant is annexed).

- 5- That instead of implementation the judgment of this Hon'ble Tribunal the respondents are bent upon not to victimize the applicant one way or the other.
- 6- That as per the spirit of the judgment and order dated 12/02/2020 of this Hon,ble Tribunal, the respondents are bound to consider the case of the applicant for promotion from the \date of notification from which she was promoted in the year of 23/09/2017. However, they have not implemented the judgment and order of this Hon'ble Tribunal in its true letter and spirit so far.
- 7- That the respondents are legally bound to implement the judgment of this Hon'ble Tribunal in its true letter and spirit without any further delay.

(4)

It is, therefore, humbly prayed that on acceptance of this application the judgment and order dated 12/02/2020 of this Hon'ble Tribunal be implemented in its true letter and spirit and be also given all back benefits from the date of her promotion vide dated 23/09/2017 as per notification No.9628-31 and also made correct entry in the service book of the petitioner.

Dated 10/11/2021

Applicant/ Appellant  
Through



Javed Ali Asghar  
Advocate,  
High Court Peshawar



(5)

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

Implementation No. \_\_\_\_\_ of 2021  
In Appeal No.371/2019

Mst: Nazia Begum EX-CT .... *Petitioner/ Appellant*

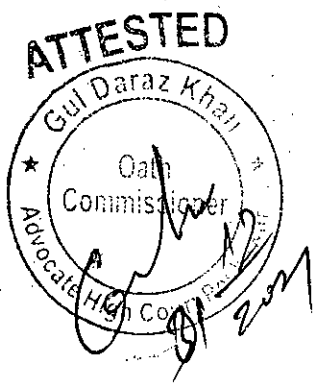
**VERSUS**

*Government of Khyber Pakhtunkhwa through  
Secretary K.P Peshawar and others*

..... *Respondents*

**AFFIDAVIT**


I, Mst: Nazia Begum EX-CT at GGMS Jarai, Hathiyan, Tehsil Takht Bhai District Mardan do hereby solemnly affirm and declare on oath that the contents of the accompanied application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



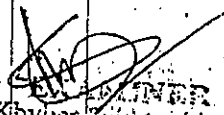
*Nazia Begum*  
**DEPONENT**

A

6

Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	12.02.2020	<p style="text-align: center;"><b>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</b></p> <p style="text-align: center;"><u>Appeal No. 371/2019</u></p> <p>Date of Institution ..... 27.02.2019 Date of Decision ..... 12.02.2020</p> <p style="text-align: right;"></p> <p>Nazia Begum CT GGMS Hari Hatyan Tehsil Takht Bhai District Malakand Mardan -----Appellant</p> <p style="text-align: center;"><b>Versus</b></p> <p>Govt. of Khyber Pakhtunkhwa Secretary Elementary &amp; Secondary Education, Peshawar and others -----Respondents</p> <p>Muhammad Amin Khan Kundi.....Member(J) Mr. Hussain Shah.....Member (E)</p> <p><b>JUDGMENT</b></p> <p><u>Mr. HUSSAIN SHAH</u>:-Learned counsel for the appellant and Mr. Usman Ghani learned District Attorney alongwith Mr. Sajid ADO (litigation) for the respondents present.</p> <p>2. The appellant was promoted from CT (Female) to Senior CT BPS-16 vide order dated 11.08.2017 and vide order dated 23.09.2017 the promoted CTs were adjusted in various school. The appellant being allegedly not aware of her promotion and subsequent adjustment did not took charge and report to the school wherein she was adjusted. Further contended that unknowing about her promotion and subsequent adjustment the appellant submitted application to respondent No.2 on 05.10.2018 for adjustment in GGHS Hatyan Tehsil Takht Bhai District Mardan against the vacant post. On 31.10.2018 she preferred a departmental appeal/representation to the respondent No.1 for adjustment against the post of SCT but despite waiting for suitable time period no action has been take on her departmental appeal/representation after completion of stipulated time period of ninety (90) days the appellant preferred the instant service appeal with prayer that on acceptance of the</p>

ATTESTED

  
 JUDGE  
 Khyber Pakhtunkhwa  
 Service Tribunal,  
 Peshawar

ATTESTED

instant appeal the Tribunal may passed an order for adjustment in sequel to the order of respondent No.2 dated 23.09.2017 Ends No. 9628-31 the appellant may kindly be adjusted as Senior CT Teacher in BPS-16 against the vacant post at GGHS Hatyan Tehsil Takht Bhai District Mardan and the impugned notification may please be corrected with back benefit, emoluments according to the law and service rules.

3. Learned counsel for the appellant argued that the appellant was posted at GGMS Jharai vide order dated 06.08.2015 till date. Learned counsel for the appellant referred to the attendance register annex to the case file to prove that at the time of up-gradation /promotion of the appellant from BPS-15 to BPS-16 she was working as CT in GGMS Jharai. He further pointed out that vide impugned order of promotion and adjustment dated 23.09.2017 at serial No.12 the appellant has been shown wrongly as working as CT teacher in GGHS Kotkai and she was adjusted in GGHS Kati Garh against the vacant post. This mistake of the place of duty at the time of her up-gradation/promotion was the main reason that the appellant could not report for duty in compliance of the impugned order dated 23.09.2017. Being innocence the appellant continue preferring her duties in GGMS Jharai Hatyan against the post of C.T. Further contended that when the appellant become aware of this anomaly she preferred a departmental appeal for correction/pre-adjustment against a vacant post in Hatyan which is near to her residence. Further contended that due to noting wrong place of posting the appellant was kept deprived of higher grade pay and benefits. It was further alleged that the appellant was kept uninformed by the respondents. Further contended that despite the application/representation the respondent did not provide any relief to correct the order and she could not leave the charge from the post of CT in GGMS Jharai and is still serving in that

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

ATTESTED

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school as CT. In view of the above grounds the learned counsel for the appellant pleaded that the instant service appeal may be accepted and the responded be directed to adjust the appellant against a vacant post in GGHSS Hatyan as Senior CT GHSS with all back benefits.

4. Learned District Attorney contested the facts, grounds of the appeal and arguments of the learned counsel for the appellant and contended that the appeal is badly time barred. Further contended that the appellant did not take interest in the up-gradation of her post BPS-16 and did not take overcharge of the said post because the appellant intended to get posting in her home station. In this regard her application/departmental appeal was referred wherein the appellant requested for posting/adjustment against the vacant post of SCT BPS-16 in GGHS Hatyan on 05.10.2018. He further contended that as her application/representation dated 05.10.2018 was late therefore no action was taken upon it. Further contended that no malafide intention was involved in her adjustment, therefore the appeal be dismissed with costs.

5. Arguments heard. File perused.

6. After the detail scrutiny of the documents record on file arguments and counter arguments of the learned counsel for the appellant and learned District Attorney this Tribunal observes that the place of posting of the appellant in the adjustment order dated 23.09.2017 is admittedly noted wrongly and despite the fact that the copy of the said order is endorsed to the official concerned the plea of the appellant not to relieve the same order is not properly responded by the responding authorities. The representative of the respondents was confronted with that why action was not initiated against the appellant in case of her failure of reporting to GGHSS Kati Garhi. The departmental representation of the respondent could not satisfy this Tribunal. This

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

ATTESTED

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situation also nullify the impact of contention of the respondent that the appeal is time barred.

7. In view of the above discussion we are of the considered view that the responded authorities are responsible for the mistakes in the impugned order dated 23.09.2017 and its subsequent impact whatever it may be hence the appeal is accepted as per prayed. Parties are left to bear their own costs. File be consigned to the record room.

*Muhammad Amin*  
(Muhammad Amin Khari Kundi)  
Member

*Hussain Shah*  
(Hussain Shah)  
Member

ANNOUNCED  
12.02.2019

Certified to be true copy  
*[Signature]*  
Peshawar

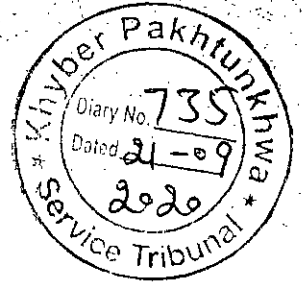
Number of Pages 13/2/2020  
Number of Words 1600  
Copying Fee 1800  
Urgent \_\_\_\_\_  
Total 1800  
Name of Applicant [Signature]  
Date of Copying 17/3/2020  
Date of Delivery of Copy 17/3/2020

**ATTESTED**

(10) (B) (11)

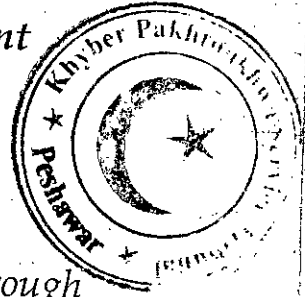
BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Petition No. 135 of 2020  
In Appeal No. 371 of 2019



Mst: Nazia Begum CT GGMS Jari Hatyan Tehsil Takht  
Bhari District Mardan.

..... Petitioner/Appellant



VERSUS

- 1- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
- 2- Director Elementary & Secondary Education GT Road Peshawar
- 3- District Education Officer, (Female) Elementary & Secondary Education Mardan.

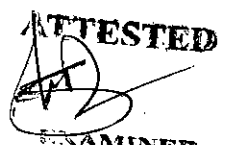
..... Respondents

APPLICATION FOR EXECUTION/  
IMPLEMENTATION OF ORDER/JUDGMENT  
DATED 12/02/2020 PASSED BY THE HON'BLE  
TRIBUNAL.

Respectfully Sheweth:

The Petitioners submit as under:

- 1) That while disposing the appeal of the appellant the Hon'ble Member Bench of this Hon'ble Tribunal on 12/02/2020, give directions to respondents contained in the last Paragraph of the said order/judgment to the effect that "in

**ATTESTED**  
  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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view of the above discussion we are of the  
consider view that the respondent /  
authority are responsible for the mistake  
in the impugned order dated 23/09/2017  
and its subsequent impact whatever it  
may be, hence the appeal is accepted as per  
prayer. Parties are left to bear their own  
cost. File be consign to record room "

2) That the petitioner approached to the  
respondents time and again for redressal of his  
grievances in light of the order of this Hon'ble  
tribunal dated 12/02/2020 but of no use and as  
the Respondents have slept over the matter and  
no step has been taken towards execution/  
implementation of the above referred order of  
this Hon'ble Tribunal so far, hence this petition  
on the following amongst other grounds: (Copy  
of appeal and order / judgment is annexed "A")

Grounds:

REGISTERED

  
J. S. SINGER  
K. M. S. Pakhtunkhwa  
Service Tribunal  
Peshawar

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3

A. That the act and omission of the respondent is illegal, unconstitutional, without jurisdiction, without lawful authority and is clear violation of the mandatory direction/order of the Hon'ble Member Bench of this Hon'ble Tribunal.

B. That the respondents are legally and constitutionally bound to implement the order of this Hon'ble Tribunal in its light and spirit and honors, obey the order of this Hon'ble Tribunal.

C. That the respondents are also legally bound to act in accordance with law/rules/policy and order/directions of this Hon'ble Tribunal.

D. That the act and omission of the respondents are not only factually incorrect and legally untenable but are

REGISTERED  
MEMBER  
IN CHARGE  
Service Tribunal  
Peshawar



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also based on male-fide intentions which are neither legal nor justified and is also the discrimination of the petitioner.

E. That the act and omission of the respondent No.3 has caused a gross miscarriage of justice to the petitioner and has deprived the petitioner of his legal right guaranteed by law and by the above referred Judgment of this Hon'ble Tribunal.

F. That the respondents are legally bound to obey the order/directions of this Hon'ble Tribunal but they willfully disobey and disregard the same and thus disrespect and disrepute the authority of this Hon'ble Tribunal which render them liable for strict action under the law.

REGISTERED



10/10/2012  
10/10/2012  
10/10/2012

(14)

(5)

It is, therefore, humbly prayed that on acceptance of this application the respondents may kindly be directed to execute /implement the judgment of this Hon'ble Tribunal dated 12/02/2020 in its light and spirit. It is, further prayed that a strict action may also kindly be taken against those, who disrespect and disrepute the authority of this Hon'ble Tribunal by not executing/implementing the above referred order/directions of this Hon'ble Tribunal.

Any other remedy/relief available in the circumstances of the case may also kindly be granted to the petitioners.

Dated 8/9/20  
~~12/02/20~~

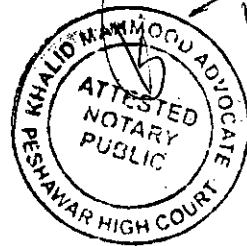
Petitioners *[Signature]*

Through

Javed Ali Asghar  
Advocate, High  
Court Peshawar.

Affidavit

I, Mst: Nazia Begum CT GGMS Jari Hatyan Tehsil Takht Bhari District Mardan, do hereby solemnly affirm and declare on oath that the contents of this application are true and correct and that nothing has been concealed from this Hon'ble Court.



*[Signature]*  
DEPONENT

Certified to be true copy

*[Signature]*  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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E.P.No. 135/2020

Mst. Najia Begum vs Govt



07.06.2021

Junior to counsel for petitioner present.

Noor Zaman Khan Khattak learned District Attorney for respondents present.

Representative of the respondents submitted implementation report which shows that corrigendum was issued in respect of the present petitioner vide order dated 04.03.2021, therefore, instant execution petition is consigned to the record room being fully satisfied. No order as to costs.

(Rozina Rehman)  
Member (J)

Date of Presentation of Application 12/7/21  
Number of Words 2400  
Copying Fee 26.00  
Urgent 4.00  
Total 30.00  
Name of Copyist \_\_\_\_\_  
Date of Completion of Copy 12/7/21  
Date of Delivery of Copy 12/7/21

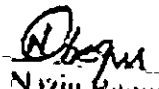
Certified to be true copy  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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# CERTIFICATE OF TRANSFER OF CHARGE

## Corrigendum

Certified that on the 04/03/2021 (FN) of this day respectively made over and received charge of SCT BPS(16) Post at GGHSS Hathian vide DEO (F) Mardan Corrigendum Endst No.919/G/File Promotion CT Dated Mardan the 04/03/2021 Cash and important secret and confidential documents handed over and noted of the reverse.

Signature of Relieving   
Govt: Servant  
Designation Mst Nazim Begum  
SCT (B-16)

Station: GGHSS Hathian (Mardan).


Signature of relieved \_\_\_\_\_  
Govt: Servant \_\_\_\_\_  
Designation \_\_\_\_\_

No. 1856-5

Dated 04-03/2021

Copy forwarded for information & necessary action to:

1. The District Education Officer (F) Mardan.
2. The District Accounts Officer Mardan
3. Personal File.

  
Principal  
GGHSS Hathian (Mardan).

Principal  
GGHSS Hathian  
Mardan

**ATTESTED**



(17)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN.**  
**PHONE/FAX NO.09379230150**  
**Email Address:-EMISMARDAN\_DEOFEMALE@YAHOO.COM**

**PROMOTION ORDER**

Consequent upon the decision of honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in service appeal No 371/2019 & Execution Petition No 135/2020, promotion Order of the CT (BPS-15) to Senior Certified Teacher (BPS-16) 18910-1520-64510 is hereby conditionally ordered in the school mentioned against her name as per policy and in the best interest of public service with immediate effect.

S.NO	Sr.No	Name of Teacher	Father Name	BPS	Present School.	Place of Adjustment
01	244	Mst; Nazia Begum	Dilawar Khan	16	GGMS Jarai Hathian	GGHSS Ikram Pur Mardan

**TERMS AND CONDITIONS**

1. The promotion order should be subject to the condition of CPLA which is pending before the Supreme Court of Pakistan.
2. Charge report should be submitted to all concerned.
3. She will be on probation for a period of one year, extendable for another one year.
4. She will be governed by such rules and regulation as may be issue from time to time by the government of Khyber Pakhtunkhwa.
5. She should join her post within 15 days of the issuance of this notification. In case of Failure to join the post within stipulated period, her promotion will stand expired automatically.
6. Her inter-se seniority on the higher post will be governed as per rules.
7. She will give undertaking, to be recorded her service book to the effect that in case any over payment is made in light of this order will be recovered and in case she is wrongly promoted, she will be reverted to the lower post.
8. Before handing over charge to the teacher promoted her documents may be checked in case she does not have the required relevant qualification, as per rule, she will not be handed over charge of the post.
9. No TA/DA is allowed.

(DR MUHAMMAD IDREES)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN.

Endst; No 881/4 /Promo/Dated CT to SCT

Dated 03/03 2021.

Copy forwarded to the:

1. The Director E&SE Peshawar Khyber Pakhtunkhwa.
2. District Monitoring officer Mardan.
3. District Account Officer Mardan.
4. Teacher Concerned
5. Master File

DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN.

**ATTESTED**



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN  
PHONE/FAX NO.09379230150  
Email Address:-EMISMARDAN\_DEOFEMALE@YAHOO.COM

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### CORREGENDUM

Please read the School Name GGHSS Hathian instead of GGHSS Ikram Pur in respect of Mst Nazia Begum vide this office Enst No; 881/G Dated 03.03.2021 in the best interest of Public Service with immediate effect.

**Note:-**NO TA/DA is allowed.

Charge report should be submitted to all concerned

**DR MUHAMMAD IDREES)**  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

Endst;No 919/G /File Promotion CT

Dated Mardan the 04/03 /2021.

### Copy forwarded to the:-

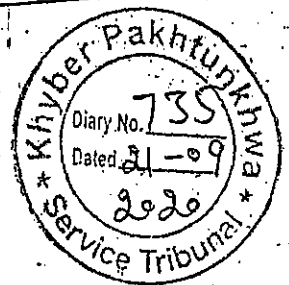
- 1 District Accounts Officer Mardan.
- 2 Principal /Head Mistress Concerend.
- 3 Personal File.

DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

**ATTESTED**

Petition No. 135 of 2020  
In Appeal No. 371 of 2019

19



Mst: Nazia Begum CT GGMS Jari Hatyan Tehsil Takht  
Bhari District Mardan.

..... Petitioner/Appellant



VERSUS

- 1- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
  - 2- Director Elementary & Secondary Education GT Road Peshawar
  - 3- District Education Officer, (Female) Elementary & Secondary Education Mardan.
- ..... Respondents

APPLICATION FOR EXECUTION/IMPLEMENTATION OF ORDER/JUDGMENT DATED 12/02/2020 PASSED BY THE HON'BLE TRIBUNAL.

Respectfully Sheweth:

The Petitioners submit as under:

- 1) That while disposing the appeal of the appellant the Hon'ble Member Bench of this Hon'ble Tribunal on 12/02/2020, give directions to respondents contained in the last Paragraph of the said order/judgment to the effect that "in

Certified to be true copy  
PESHAWAR  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar.

I have no objection on her adjustment. The SET post is lying vacant in CGHSS Hathian.  
2/3/21

Principal  
GGHSS Hathian  
Mardan

ATTESTED

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EP No. 135/2020  
Najia Begum vs Govt

01.02.2021

Counsel for the petitioner and Addl. AG alongwith Sajid, ADO for the respondents present.

The representative of respondents states that the relevant office to implement the judgment in this case is of respondent No. 2. A summary for the purpose has already been prepared and sent to the said office for further proceedings towards implementation. He undertakes to personally expedite the matter.

In view of the submissions of representative and the fact that the respondents are being representing by a representative for the first time today, they are entitled for grant of opportunity to submit the implementation report.

Adjourned to 31.03.2021 for further proceedings before S.B.

Chairman

Certified to be true copy

**ATTESTED**

E. M. Khan  
Chairman  
Service Tribunal  
Peshawar

Date of Presentation of Application 08/2/21

Number of Words 800

Copying Fee 10/-

Urgent   

Total 10/-

Name of Applicant   

Date of Completion of Copy 08/2/21

at Govt



Heirs.

(C) (21)

(15) As verified by the University of Malakand

Verification Roll No. U vide NO dated 13/01/2011 received back  
dated 27-11-2011

passed BA (A) Examination session 2011  
from the University of Malakand under.

Roll No. Left Thumb Impression 7301 Marks  
obtained 316 out of 550 placed in 2nd.

Division - Result declared on 25-08-2011

Qualification	Date	Qualification	Date
		<u>Attic</u> <u>D.O. (Female)</u> <u>F &amp; SE Mardan</u>	
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership examination	
Plan-drawing		Training School Final examination	
Finger Print		Other qualifications—	
		<u>1) Passed SSC Examination from BISE Peshawar Under Roll</u> <u>NO 105342 in session 1995 obtained Marks 470 out of 850</u>	
Drill Instructing		<u>2) Passed FA Examination from BISE Peshawar Under Roll</u> <u>164205 in session 1997 obtained Marks 511 out of 1100</u>	
		<u>3) Passed BA Examination from University of Peshawar Under</u> <u>Roll NO 81224 obtained Marks 220 out of 550 Third Division</u>	
Reserve Duties		<u>4) Passed CT Examination from School and Literary Deptt.</u> <u>Peshawar Under Roll NO 1850 in session 2002 obtained Marks</u> <u>790 out of 1200 and placed 1st Division</u>	

[Signature]  
**ATTESTED**

N.B.— Line to be drawn under the qualification passed.

Note: The entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

Name: MISS Nazia Begum

Race: Afghan (Muslim)

Residence: Village Narkoon P/O Sheringal District Dir Upper

Father's name and residence: Mr. Dilawar Khan



Date of birth by Christian era as nearly as can be ascertained: 14-04-1978  
fourteen April Nineteen hundred & seventy eight



Exact height by measurement: 5-5

Date

Personal marks for identification: - NIL -

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger:  Ring Finger: 

Middle Finger:  Fore Finger: 

Thumb: 

ATTESTED

Signature of Government Servant: Nazia Begum

Signature and designation of the Head of the office, or other Attesting Officer:   
District Officer (F),  
Elementary & Secondary,  
Education Dir Upper.

old  
sdw  
in  
P.H.  
marks

25

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
ET elected Dogy peyee	Sup.	BPS-09-3820	230	-10720-	3820	20-11-08	Dogy peyee
ET post 99MS left key	ch.	ch.	4050/			1/12/09	Dogy peyee Notice
ET post 99MS left key	ch.	ch.	4050/PT.			2/20/10	Dogy peyee Notice
							Dogy peyee
							Dogy peyee
							Dogy peyee
							Dogy peyee
							Dogy peyee
							Dogy peyee
							Dogy peyee
							Dogy peyee

~~ATTESTED~~

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column

DIR  
Elem  
F.S.

Notice

Notice

Dog  
1/12/09  
big

D.  
F.S.

D.  
F.S.

D.  
F.S.

W  
20/10

BPS-09-

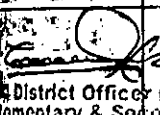
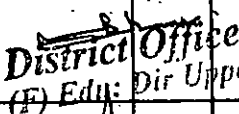
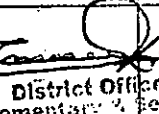
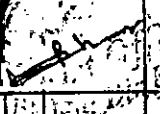

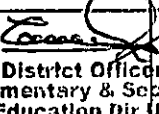
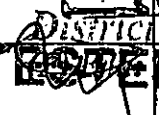
6960/-

128

7/20/11

12

24

8	9	10	11	12	13		14	15	
		Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Period	Government to Which debitabe		
		 District Officer (F), Elementary & Secondary Education Dir Upper	A/Dir	 District Officer (F) Edu: Dir Upper	Period	Government to Which debitabe	 District Officer (F), Elementary & Secondary, Education Dir Upper.	Appointed as CT at 27/11/08 Pajen vide EDO (E&SE) D. M. Bule No 8328-35 dated 19-11-2008.	
		 District Officer (F), Elementary & Secondary, Education Dir Upper.	Transferred Service placed at the disposal of EDA Mardan	 District Officer (F) Edu: Dir Upper					
		D.O. (Female) E&SE Mardan.		D.O. (Female) E & SE Mardan.				7-153 30/5/09. Paid Pay Allowance on CT. Appnt No. 8328-35 dt 29-11-08 ad EDO No. 2192-95 dt 6/5/09 to 31/5/09 (b 344824) 11/8/08 CAR 2008-09 Page 13. 26/08-7/5/09	
		MF 206 15/11/10						Pay Release order issued vide EDO S&L No. 2192-95/E-63 dated 6/5/2009	
		D.O. (Female) E & SE Mardan.	30/6/2011	pay Revised	D.O. (Female) E & SE Mardan.		 District Officer (F), Elementary & Secondary, Education Dir Upper.		
		D.O. (Female) E & SE Mardan.	30/11/2011		D.O. (Female) E & SE Mardan.			Service Verified with effect from 20/11/08 To 31/1/2009 Acquittance roll and Office Record	
		D.O. (Female) E & SE Mardan.	14/5/2012	school up Reached to High Status	D.O. (Female) E & SE Mardan.		 District Officer Dir Upper.	<b>ATTACHED</b>	

25

Signature of  
Government serva

Whether substn-  
tle or officiating  
and whether  
permanent or  
temporary.

If officiating, state  
(i) substantive  
appointment, or,  
(ii) whether service  
counts for pension  
under Art. 371  
C.S.R.

Pay in  
substantive  
post

Additional  
pay for  
officiating

Other  
emolument  
falling  
under the  
term "pay"

Date  
of  
Appointment

Name of Post

C.T Post  
RHS Kotki  
(Mardan)

pay

Rs=7340/- PM

15/5  
2012

HEA  
G.G

to

7720/- PM

12  
22/12

HE  
G.G

ATTESTED

ET Post  
GHS

1-cabri-  
Bala

BPS-15

7720/- PM

17  
2013

D.O  
E.S

8520-700-29500

to pay

RS

8500/- PM

17  
2014

D.O

to pay

RS

Rs 8500/- PM

12  
2012

D.O

to

Rs 9200/-

11/12  
13

D.O  
E.S  
D.E

Name and Designation of head of the office attesting officer (Columns 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period	Government to Which debitable		
HEAD MISTRESS G.G.H.S KOTKAY MARDAN	30/11/2012	A/Inc.	[Signature]	After verification of service documents from the BEO Dir upper & Director Education & Self- Education Muzf. Jashaur. The pay is already released upto 01-02-2010 vide		EEO (LAs) Mardan Buds. NO. 3105-8 U.F. 1955 - Nazia Begum of dated 16-04-2010	[Signature]	
			[Signature]			Service verified upto 1-2-2010	[Signature]	
			[Signature]			TD-30-11-2011 from the Acquisition pull h other 2 record 2012	[Signature]	
HEAD MISTRESS G.G.H.S KOTKAY MARDAN	16/3/2013	Transfer to G.G.H.S. Bala	[Signature]				D.O. (Female) E & SE Mardan.	
			[Signature]			After grant of Maternity leave Granted Maternity leave for the period upto 9/10/2011	[Signature]	
			[Signature]			12.5-01-2012 90 days on full pay approval by me D.O. Mardan. NO. 6682 dated 29-12-2011 r by EEO (LAs) Education Mardan. NO. 184 dated 6-01-2012	[Signature]	
			[Signature]				D.O. (Female) E & SE Mardan.	
			[Signature]				D.O. (Female) E & SE Mardan.	
			[Signature]				D.O. (Female) E & SE Mardan.	



Name and Designation of head of the office or attesting officer (columns 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Nature and duration of leave taken		Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which debitable				
	MF NO 332 05/10/13								
		Brown on account of office by + others						Service Verified w.e.f. 1-7-2011	
	award B-15 on 12/12/12	in case of upgradation						from the acquittance rolls and other record maintained in this Office.	
	PL 8500-7340 (8500-7720)								D.O. (Female) E & SE Mardan
	MA 12 (1700-1468) (1700-1544)							service verified w.e.f. 15-5-2012	
								TO 16-2-2012 from the acquittance roll & other record of this office	
D.O. (Female)	30/6/15	Pay Revised							HEAD MISTRESS G.G.H.S KOTIAY MARDAN
D.O. (Female)	30/7/15	A/m							UP-GRADATION OF POSTS 1-7-2012
	30/6/2016	RBPS							In pursuance of Govt. Khyber Pakhtunkhwa, Finance Department (Regulation Wing) No. SO(FRI/FOT)-22(E)/2011 Dated 26-6-2012, Elementary & Secondary Education Deptt. No. SO(BBA)/1-18/E&SE/2012 Dated 11-7-2012, approval given by the District Coordination Officer, Mardan vide No. 11420-29/DCO/(M)/EA-0 dated 2-10-2012. Sanction is hereby accorded to the up-gradation of Post <u>ET</u> to BPS-15 with effect from 17.2.2012 by the Executive District Officer (E&SE), Mardan vide No. 18520/G dated 7-10-2012
<b>ATTESTED</b>									
				<b>Under Taking:</b>					
				<p><u>Miss. Nargis Begum</u> is hereby given an under taking to the effect that if any over payment is made to me as result of incorrect fixation of pay in d/w award of <u>BPS-15</u> to me. It will be recovered from my Pay Pension gratuity etc. deemed fit by the</p>					
D.O. (Female)	30/11/16	Annual	District Education Officer (F) Mardan	<p>Signature</p> <p>Signature</p>					
				<b>D.O. (Female)</b> <b>E &amp; SE Mardan</b>					



1	2	3	4	5	6	7	8
Name of Post	Whether substan- tive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
C/GMS Kacedan Bala Mordan.			Rs. 17990/- PM ✓			1/12 /2016	
		B.P.S-15	Rs. 16120/-	13.3	-55020		
			Rs. 21440/- PM ✓			1/7 /2017	
			Rs. 22770/- PM ✓			1/12 /2017	
			Rs. 24100/- PM ✓			1/12 /2018	
			Rs. 25430/- PM ✓			1/12 /2019	
			Rs. 26760/- PM ✓			1/12 /2020	
SU-216		(18910-1520-64520)					
			Rs. 29550/- PM ✓			3/4 /2021	4/3 /2021

ATTESTED

Signature of Government servant	Name and Designation of head of the office or attesting officer. (Sections 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
	District Education Officer (F) Mardan	22/11/17	Revised pay				30-11-2015	15-5-2016
	District Education Officer (F) Mardan	30/11/2017	Annual Increment					
	District Education Officer (F) Mardan	30/11/2018	Annual Increment					
	District Education Officer (F) Mardan	30/11/19	Annual Increment					
	District Education Officer (F) Mardan	30/11/20	Annual Increment					
	District Education Officer (F) Mardan	03/03/2021	Promoted to SET BPS-16					

3/2021

ATTESTED

District Education Officer (F) Mardan

Service Verified w.e.f. 1-12-2017 to 30-11-2018

District Education Officer (F) Mardan

(31)

8	9	10	11	12	13		14	15
					<b>Leave</b>			
Signature of Government servant	Name and Designation of the head of the office or other attesting officer	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Period Government to which debitable		
							<p>Service Verified w.e.f. 1-12-2018 30-11-2019</p> <p>rolls and other records maintained in this Office</p>	<p>from the accounts maintained in this</p>
							<p>District Education Officer (F) Mardan</p>	<p><i>[Signature]</i></p>
							<p>Service Verified w.e.f. 1-12-2019 03-03-2021</p> <p>rolls and other records maintained in this Office</p>	<p>from the accounts maintained in this</p>
							<p>District Education Officer (F) Mardan</p>	<p><i>[Signature]</i></p>
							<p><b>ATTESTED</b></p> <p><i>[Signature]</i></p>	

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

32

Appeal No. 371 of 2019

Khyber Pakhtunkhwa  
Service Tribunal

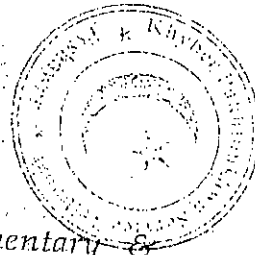
Diary No. 288

Dated 27/2/2019

Nazia Begum CT GGMS Jari Hatyan Teshil Takht  
Bhai District Mardan.

..... Appellant

VERSUS



- 1- Govt of KPK through Secretary Elementary & Secondary Education, Peshawar.
- 2- Director Elementary & Secondary Education, GT Road, Peshawar.
- 3- District Education Officer Female District Mardan.

..... Respondents

Filed to-day  
Recd.  
Registrar  
27/2/19

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED NOTIFICATION WHEREAS THE SENIORS CTS TEACHERS PROMOTED IN BPS-16 ADJUSTED, VIDE ORDER DATED 23/09/2017 ENDST NO:9628-31 AND THE ORDER WAS CIRCULATED THE APPELLANT IS PROMOTED AT SERIAL NO.12 IN SENIORITY LIST ADJUSTED IN GGHS KATTI GHARI, IN THE SAID POST ONE MST: FALAK NAZ, SCT TEACHER FROM GGHS KATLANG ADJUSTED IN GGHS KATTI GHARI ON THE SAME SCHOOL WHICH IS AGAINST THE LAW AND SERVICE RULES AND REGULATIONS.

~~ATTESTED~~

Re-submitted to-day and filed.

Recd.  
Registrar  
18/3/19  
ATTESTED

ATTESTED  
To Be True Copy

Registrar  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Prayer!

On acceptance of instant appeal, this Hon'ble Tribunal may very graciously passed an order for adjustment in sequel to the order of the respondents dated 23/09/2017 Endst No.9628-31, the appellant may kindly be adjusted and complied the Senior CTs Teacher from BPS-16 on the vacant post at GGHS Hathian Tehsil Takht Bhai District Mardan and the impugned notification may please be corrected issued by the respondents, with all back benefits/ monuments in according to law and service rules.

Respectfully Sheweth:

Brief facts leading to the instant appeal are as under:

- 1- That the appellant is serving as CT Teacher in GGMS at Jariy. (Copy of the CNIC and service card are annexed as Annexure "A&B").
- 2- That the impugned notification Endst No.9628-31 vide dated 23/09/2017, and two teachers on the same post are adjusted which is wrong and illegal. (Copy of impugned notification is annexed as Annexure "C").
- 3- That the appellant was transferred from GGHS Kotki to GGMS Kaudary Bala Endst No.1119 dated 16/03/2013 issued by the respondent No.2.

ATTESTED

MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

ATTESTED  
To Be True Copy

ATTESTED

(3)

34

(Copy of transfer order of Kaudari is annexed as Annexure "D").

4- That the appellant is Government Servant in Education Deptt on the post of CT Female Teacher and presently serving at GGMS Jarray School Village Hatyian Tehsil Takht Bhai District Mardan.

(Copy of transfer order in GGMS Jarri is annexed as Annexure "E").

5- That the appellant is working and performing duties in GGMS Kaudary Bala to GGMS Jarray on 06/08/2015. (Copy of attendance is annexed as Annexure "F").

6- That the appellant came to know through reliable sources, she is promoted from BPS-16 Senior CT Teacher on the Endst No.9628-31 Serial No.12 but appellant was wrongly adjusted in the GGHS Katti Ghari then the appellant submitted application on dated 05/10/2018 to the respondent No.2 for adjustment in the GGHS Hathian Teshil Takht Bhai District Mardan. (Copy of application for adjustment is annexed as Annexure "G").

**ATTESTED**

**ATTESTED**  
To Be True Copy

ATTESTED

  
Member  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

7- That the appellant obtained a certificate copy against the vacant post in GGHS Hathian and in

(35)

In this respect no objection certificate has been obtained from the Principal Hathian. (Copy of Certificate is annexed as annexure "H").

8- That the appellant filed departmental appeal/representation to the Respondent No.1 on 31/10/2018 for her adjustment but upto now the appellant was not adjusted against the vacant post. (Copy of departmental / representation is annexed as Annexure "I").

9- That the appellant has not been received any response in 90 days have been elapsed on his representation and hence this appeal inter-alia on the following grounds:

GROUND:

A) That the above mentioned notification is wrong and illegal to extent about the adjustment of the appellant and one another SCT Teacher BPS-16 on in the same school GGHS Katti Ghari, on this reasons, needs to be corrected.

B) That the appellant is on serial No.12 in the said notification and seniority list No.245 was shown the appellant present place of duty GGHS Kotki and adjusted against the vacant post at GGHS Katti Ghari, and the another teachers Mst: Falak

**ATTESTED**  
To Be True Copy

**ATTESTED**

**ATTESTED**


MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

H

Naz Senior CTs were to adjusted from GGCMHS  
Katlang to GGHSS Katti Ghari on Serial No.41  
one and same notification, the appellant was kept  
unaware from this notification. The notification  
was not forwarded to the appellant wherein the  
appellant is performing her duty in GGMS Jarri  
Hathian District Mardan, the act of the  
respondents is illegal and against the service rules  
and regulations.

- C) That the respondents deliberately not informed the  
appellant's about her promotion in BPS-16.
- D) That the appellant is deprived from their  
promotion benefits in Senior CT Teacher BPS-16  
and still performing her duty in BPS -16 in the  
GGMS Jarri, the appellant came to know  
immediately submitted an application to the  
respondent No.2 but no response was given to her  
prayer, the act of the respondents is against the law  
and service rules.
- E) That according to law and justice the appellant is  
deserving all back benefits in accordance with the  
notification issued by the respondent No.1 because  
the act of the respondent is one of negligence on  
the respondents / Government for which the  
appellant may not be suffered and the appellant is

ATTESTED

  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

ATTESTED  
To Be True Copy

ATTESTED



deserved the right to obtain the benefit/monuments of BPS-16 since from appellant promotion.

- F) That now the appellant is serving the respondent in the capacity of BPS - 16 rather than Senior CT Teacher BPS-16 in spite of appellant promotion to Senior CT Teacher BPS-16, which is discrimination / malafide on the part of the respondents, which should be addressed in accordance with law.
- G) That the appellant seeks leave of this Hon'ble Tribunal to rely on additional grounds at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant appeal, this Hon'ble Tribunal may very graciously passed an order for adjustment in sequel to the order of the respondents dated 23/09/2017 Endst No.9628-31, the appellant may kindly be adjusted and complied the Senior CTs Teacher from BPS-16 on the vacant post at GGHSS Hathian Tehsil Takht Bhai District Mardan and the impugned notification may please be corrected issued by the respondents, with all back benefits/ monuments in according to law and service rules.

~~ATTEST~~

Dated 27/02/2019

Appellant  
Through

*(Signature)*

(Javed Ali Asghar)  
Advocate,  
High Court Peshawar

Certified  
*(Signature)*  
Service Tribunal,  
Peshawar

**ATTESTEL**  
To Be True Copy

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
EDUCATION DEPARTMENT


**HAZIA BEGUM**  
CT. (DPS-18)

Duty Station: GGMS JHARI (Head teacher)  
DISTRICT MARDAN

Personal ID: 00447694

Barcode

Service Card



38

*Handwritten signature*

**ATTESTED**  
To Be True Copy

**ATTESTED**

Dist. Govt. KP-Provincial  
District Accounts Office Mardan  
Monthly Salary Statement (September-2021)

39



Personal Information of Miss MISS NAZIA BEGUM d/w/s of DILAWAR

Personnel Number: 00447894

CNIC: 1610257729930

NTN:

Date of Birth: 14.04.1978

Entry into Govt. Service: 20.11.2008

Length of Service: 12 Years 10 Months 012 Days

Employment Category: Active Temporary

Designation: CERTIFICATED TEACHER

80003521-DISTRICT GOVERNMENT KHYBE

DDO Code: MR6128-PRINCIPAL G.G.H.S.S HATIAN MARDAN

Payroll Section: 003

GPF Section: 001

Cash Center: 1

GPF A/C No: 447894

Interest Applied: Yes

GPF Balance:

356,840.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil

BPS: 16

Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	29,550.00	1001	House Rent Allowance 45%	4,091.00
1210	Convey Allowance 2005	5,000.00	1947	Medical Allow 15% (16-22)	1,250.00
2148	15% Adhoc Relief All-2013	495.00	2199	Adhoc Relief Allow @10%	343.00
2211	Adhoc Relief All 2016 10%	1,799.00	2224	Adhoc Relief All 2017 10%	2,955.00
2247	Adhoc Relief All 2018 10%	2,955.00	2264	Adhoc Relief All 2019 10%	2,955.00
2309	Adhoc Relief All 2021 10%	2,955.00	2316	Teaching Allowance 2021	3,782.00

Deductions - General

Wage type		Amount	Wage type		Amount
3016	GPF Subscription	-3,340.00	3501	Benevolent Fund	-1,500.00
3609	Income Tax	-321.00	3990	Emp.Edu. Fund KPK	-150.00
4004	R. Benefits & Death Comp:	-650.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
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Deductions - Income Tax

Payable: 5,135.25 Recovered till SEP-2021: 963.00 Exempted: 1283.70 Recoverable: 2,888.55

Gross Pay (Rs.): 58,130.00 Deductions: (Rs.): -5,961.00 Net Pay: (Rs.): 52,169.00

Payee Name: MISS NAZIA BEGUM

Account Number: 70000100-01

Bank Details: HABIB BANK LIMITED, 220825 SHER GARH SHER GARH,

Leaves: : Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: DIR UPPER

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: missnazia30@gmail.com

ATTESTED

وکالت نامہ

بعدالت صاحب سپریم کورٹ کراچی

منجانب سید  
مہتاب نازہ

## باعث تحریر آنکہ

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

### جاوید علی اصغر ایڈووکیٹ ہائی کورٹ پشاور

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحبان کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دیئے جواب دہی اقبال دعویٰ اور بصورت ڈگری کرنے اجراء در وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر این پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجا نیتقرر کا اختیار ہوگا۔ اور صاحبان مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس ساختہ پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ ہو یا حد سے باہر ہو تو وکیل صاحبان پابند ہونگے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2024

العبد

کے لئے منظور ہے۔

ماہ

گواہ

المرقوم

العبد

بمقام

ACCEPTED

Javed Ali Asghar

Advocate High Court,  
Peshawar.

BC No. 10-5480

CNIC#16102-0329399-3

Cell # 0333-9132933



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

EMAIL: - EMISMARDAN\_DEOFEMALE@YAHOO.COM PHONE/FAX NO.09379230150

**CORRIGENDUM**

Consequent upon the implementation of judgment of honorable Khyber Pakhtunkhwa Service Tribunal Peshawar appeal No. 371/2019 & Execution Petition No.45/2022. The date of promotion of SCT post in BPS-16 may be read as **11.08.2017** instead of immediate effect in respect of Mst. Nazia Begum, in Promotion order issued vide this office Endst. No.881/G/Prom/CT to SCT Dated 03.03.2021.

Note: -


**Terms and conditions will remain same as per above mentioned promotion order.**

(ABIDA PARVEEN)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN

Endst: No. 5897/9 P-File of Litigation Section Dated Mardan the 03/09 /2022

**Copy forwarded to the...**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
3. District Accounts Officer Mardan.
4. Principal/Headmistress concerned.
5. Teacher Concerned.
6. Master File.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MARDAN