


hand and integrity of the proceedings on the other. Since the matter has already been delayed inordinately it is expected that the proposed exercise should not take more than three months whereafter a progress report be submitted to the Registrar of the Tribunal."

- 10. That thereafter the Department in the light of the Judgment *ibid*, constituted Enquiry Committee vide Notification dated 29.11.2011 under the Chairmanship of Respondent No.1. The Committee then called upon appellant and others through Press Media to the Circuit House D.I.Khan. The appellant on the day fixed appeared for enquiry, however, instead of complying with the directions of the Hon'ble Tribunal and mandatory provisions of law, adopted a sham proceedings as a Clerk of Education Department provided a printed proforma to the appellant which was got filled by him and returned. The Proforma contained inquiry regarding the qualification of the appellant and nothing more. Neither Charge Sheet with statement of allegations, nor enquiry nor any Show Cause Notice nor opportunity of personal hearing was given to appellant.
- 11. That Committee thereafter on the basis of so called enquiry recommended the appellant and others for termination vide recommendations (*Annex:-I*) on the same grounds as alleged in the previous enquiry vide recommendations of the previous enquiry. The appellant then approached this Hon'ble Tribunal in Execution Petition but the same was disposed of vide order dated 14.03.2012 (*Annex:-J*) observing that the execution Petition has served its purpose and that as fresh orders in pursuance of the recommendations of the Committee will accrue a fresh cause of action for appeal or any other remedy permissible under law which was beyond the scope of execution Petition. Consequently the EDO (E&SE), D.I.Khan vide impugned order communicated verbally on 07.04.2012 terminated the services of appellant. It is important to mention here that appellant repeatedly asked the then EDO (E&SE), D.I.Khan for providing copy of the impugned order but he refused to provide the same inspite of the clear-cut directions of the Tribunal.

ATTESTED


 Kh. Ghulam Mustafa
 Service Tribunal,
 Peshawar

12. That the appellant then preferred departmental appeal to the Appellate Authority on 10.04.2012 (*Annex:-K*) but the same was not disposed of within the statutory period of 90 days, hence the instant appeal inter-alia on the following grounds:-

Grounds:

- A. That Respondents have not treated appellant in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 and unlawfully issued the impugned termination order, which is unjust, unfair and hence not sustainable in the eye of law.
- B. That the Respondents failed to comply with the clear-cut directions of this Hon'ble Tribunal contained in the Judgment dated 27.10.2011, by not conducting a fair and transparent enquiry as per observation of the Judgment contained in Para No.8; hence the impugned order is illegal, without lawful authority and liable to be set aside.
- C. That appellant being highly qualified person, was not reinstated into service inspite of the direction of this Hon'ble Tribunal, therefore, the impugned order is void, ab-initio and not sustainable. Appellant produced all his credentials before the Enquiry Committee but invain.
- D. That no speaking order as per direction of Hon'ble Tribunal was passed but to the contrary on a fill-in-the-blank termination order was passed which was verbally communicated to the appellant which is not legally correct, hence the impugned order is unwarranted and not maintainable.
- E. That no Charge Sheet with Statement of allegations was served to the appellant which are mandatory requirements of law, therefore, the impugned proceedings and the consequent impugned order is nullity in the eye of law.
- F. That no regular enquiry was conducted against the appellant and it is now a settled legal principle that a civil servant cannot terminated from his service without holding a regular enquiry.

ATTESTED

MEMBER
Peshawar
Service Tribunal

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The so call proceedings conducted and which culminated into the termination of the service of appellant cannot be equated to that of regular enquiry.

G. That no Final Show Cause was served upon the appellant nor was he provided any opportunity of personal hearing. All the proceedings were taken at the back of the appellant without meaningfully associated the appellant with any stage in violation of the law and direction of the Hon'ble Tribunal, thus the impugned order is against the settled legal principles including the principles of natural justice.

H. That the appointment order of the appellant was issued after observing all the codal formalities and on the basis of the same, appellant joined the service and performed duty for a considerable period of time thus the orders were carried in effect and valuable rights have accrued to the appellant, which cannot be terminated under the principle of locus poenitentiae.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted as prayed for above.

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

[Handwritten Signature]
Appellant

Through

[Handwritten Signature]
Khaled Rahman,
Advocate, Peshawar

Dated: _____ / 08/ 2012

Certified to be true copy

[Handwritten Signature]
Khaled Rahman,
Advocate, Peshawar

Date of Presentation of Appeal 03-04-18
 Number of Pages 4600
 Copying Fee 22
 Urgent 2
 Total 24
 Name of Clerk *[Handwritten Name]*
 Date of Receipt 03-04-18
 Date of Delivery of Copy 03-04-18

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No: 932/2012

MST. FOZIA MAZIK B. ET AL. VS. Govt. of Khyber Pakhtunkhwa, Peshawar & others

-----Applicant

VERSUS

1 Secretary Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar & others.

-----Respondents

PARAWISE COMMENTS/REPLY FOR AND ON BEHALF OF THE RESPONDENTS

Respectfully Sheweth:-

Preliminary objections

- 1 The appellant has no cause of action/locus standi.
- 2 The instant appeal is badly time barred.
- 3 The appellant has concealed the material fact from this Hon! able Tribunal hence liable to be dismissed.
- 4 The appellant has not come to this Hon! able Court with clean hands.
- 5 The present appeal is liable to be dismissed for non joinder/mis-joinder for necessary parties.
- 6 The appellant has filed the instant appeal on malafide motives.
- 7 The instant appeal is against the prevailing laws & rules.
- 8 The appellant is stopped by his own conduct to file in present appeal.
- 9 The instant appeal is not maintainable in the present form & also in the present circumstances of the issue.

FACTS.

- 1 This Para is related to appellant personal and academic record hence needs no comments.
- 2 The advertisement mentioned in this Para was published by competent authority in the best interest of public.
- 3 This para pertains to record and has no concern to the issue in question.
- 4 Incorrect. The said appointment order along with other, being proved illegal and irregular through impartial inquiries, were terminated on 4-9-2009 by DCO District D I Khan (Annexure " E" of the appeal) (inquiry).
- 5 This para pertains to record hence, no comments.
- 6 This para pertains to Assembly record hence no comments. While it would not be out of context that this Hon! able Tribunal has already rendered judgment in these cases and on the same points.

ATTORNEY

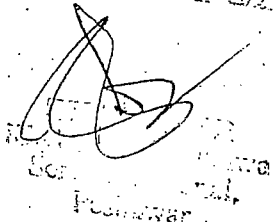
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- 7 As replied in para-6 above.
- 8 This para pertains to the record of the Apex Court, hence no comments.
- 9 The judgment mentioned in this para was implemented by the department and submitted the implementation report before this Hon! able Tribunal as evident from order-sheet dated 14-3-2012 in E.P No: 14/2012 (Annexure"J" of the appeal).
- 10 Incorrect. The mentioned enquiry committee called upon the appellant and probed in case to case of the appellants and provided the opportunity of defense/ personal hearing and conducted the inquiry in the light of the directions of this Hon! able Tribunal.
- 11 Correct to the extant that the enquiry committee on scrutinizing record of case to case, recommended the appellant and others, for termination as the appointments were proved illegal and irregular on the basis of record and facts. While according to the statement of the Executive District Officer E&SE District D I Khan Mr. Feroz Hussain Shah stated at the bar that they had already implemented the recommendations of the committee, and issued the order/letters accordingly (Annexure"J" of the appeal).
- 12 Incorrect & not admitted. No departmental appeal has been found on the record of this office, hence the appeal in hand is liable to be dismissed inter alia on the following grounds.

GROUNDS

- A Incorrect & not admitted. The appellant has been treated, in accordance with law, rules, policy on the subject & in the light of directions of this Hon! able Tribunal, hence the termination order is just, fair and sustainable in the eye of law.
- B Incorrect. The respondents complied with the direction of this Hon! able Tribunal and conducted fair and transparent enquiry, hence the termination of the appellant is legal and by lawful authority and the appeal in hand is liable to be dismissed.
- C Incorrect & not admitted. The appointments of the appellants were illegal and irregular according to the findings of inquiry committee, hence denied.
- D Incorrect. According to statement of EDO (E&SE) as recorded at the bar the proper speaking order was passed, hence this Para is denied.
- E Incorrect and not admitted. The statement of the appellant in this Para is against the facts, law rules on the subject and all requirement of law were fulfilled.
- F Incorrect, regular inquiry was conducted on case to case basis and recommended the termination of the appellant, being illegal and irregular.
- G Incorrect and not admitted. As replied in Paras above.

ATTESTED




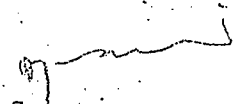
Secretary

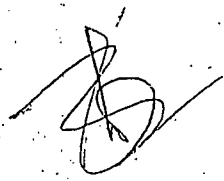
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H Incorrect. This Hon' able Tribunal had already considered and adjudicated upon the points raised in this Para. Moreover the respondent also seek the permission of this Hon' able Tribunal to adduce more grounds, proofs and record at the time of final hearing.

In view of the above submission, it is requested that this Hon' able Tribunal may very graciously be pleased to dismiss the appeal with cost in favour of the respondent Department.


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.


Secretary
Elementary & Secondary Education
Department, Khyber Pakhtunkhwa,
Peshawar.



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1 Annex - M

BEFORE THE HONOURABLE PESHAWAR HIGH COURT

BENCH DERA ISMAIL KHAN.

Writ Petition No. 430 -D/2021



**Fozia Malik D/o Malik Allah Nawaz W/o Malik Gohar Saeed
R/o Khanukhel, Tehsil Paharpur, District Dera Ismail Khan.**

(Petitioner)

VERSUS

1. Government of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary Education, K.P.K Peshawar.
2. Director Elementary & Secondary Education, Schools & Literacy, KPK, Peshawar.
3. District Education Officer, (Female), Dera Ismail Khan.
4. Sub Division Education Officer (Female), Tehsil Paharpur, District Dera Ismail Khan.
5. Head Mistress/Principal, Government Girls High School, Kot Jai, Tehsil Paharpur, District Dera Ismail Khan.

(Respondents)

Filed today
Addl. Registrar

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

PRAYER:-

**ON ACCEPTANCE/ISSUANCE OF THE INSTANT WRIT
PETITION UNDER THE FOLLOWING PRAYERS:-**

**A. TO DIRECT THE RESPONDENTS TO ACT IN
ACCORDANCE WITH LAW AND TO RESTORE THE
SERVICES OF THE PETITIONER WITH ALL BACK
BENEFITS W.E.F THE ALLEGED ILLEGAL IMPUGNED
TERMINATION LETTER NO.1520-1602 BACK DATED
08/02/2012 WITH FURTHER DIRECTIONS TO PRODUCE
THE RELEVANT RECORD OF THE LETTER NO.1520-
1602 DATED 08/02/2012.**

ATTESTED

EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan

22-11-2021

(78)

(2)

B. TO DIRECT THE RESPONDENTS TO CANCEL/WITHDRAW THE ILLEGAL, BOGUS AND CONCOCTED TERMINATION ORDER OF THE PETITIONER VIDE ALLEGED LETTER NO.1520-1602 DATED 08/02/2012 BEING HAVING NO RECORD IN THE OFFICE THE RESPONDENTS AND THE SAME BE DECLARED AS VOID AND IN EFFECTIVE OVER THE RIGHTS OF THE PETITIONER.

C. TO ISSUE THE DIRECTIONS TO THE RESPONDENT NO.1 TO TAKE NECESSARY ACTION (CRIMINAL AND DEPARTMENTAL) AGAINST THE RESPONSIBLE RESPONDENTS WHO ISSUED THE ILLEGAL TERMINATION ORDER VIDE LETTER NO.1520/1602-DATED 08/02/2012 AND DEPRIVED THE PETITIONER FROM HER VALUABLE RIGHTS.

ANY OTHER RELIEF WHICH THIS HONOURABLE COURT DEEMS FIT IN THE GIVEN CIRCUMSTANCES MAY ALSO BE GRANTED TO THE PETITIONER.

Filed 10/04/2012
ADIL-TEHSIL
OS

Note:- Addresses given above are sufficient for the purpose of service of parties.

Respectfully Sheweth;

1. That the petitioner is a law abiding and peaceful citizen of Pakistan.
2. That the Petitioner was appointed as C.T (BPS-09) against the vacant post in Government Girls High School Kot Jai on 01/10/2007 by the Respondents. Copy of letter dated 01/10/2007 is annexed as Annexure-A.
3. That the Petitioner joined her services and served in the department till 30/04/2010 i.e. two years and seven months. Copies of Experience Certificate along with LPC are jointly annexed Annexure-B.

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4. That after 30/04/2010, the Petitioner was forced to relieve her services and the Respondents were not allowing the Petitioner to join and carry on her services any more.
5. That few of the effectees along with the petitioner preferred a Writ Petition No.151-D/2015, titled, "**Mst. Rozina Shaheen & Others Versus Govt; of KPK**", on the grounds mentioned in the writ petition and the same writ petition was disposed off with the directions to respondents to provide the copy of termination order of the petitioner in the said writ along with the termination orders of other effectees and in compliance, the Respondents issued the back dated impugned order dated 08/02/2012 vide letter no.1520-1602 vide which the petitioner is placed at Serial No.42. Copies of WP#151/2015, Order dated 16/05/2018 along with impugned order dated 08/02/2012 are jointly annexed as Annexure-C.

FILED MAY 3 2018
 DISTRICT JUDGE
 PESHAWAR
 PESHAWAR

6. That the Petitioner after obtaining the copy of joint termination impugned order immediately through her husband submitted different applications to the proper forums to obtain the registered record of impugned Letter No.1520-1602 dated 08/02/2012 and surprisingly all the respective forums in their replied to the husband of Petitioner under RTI Act, 2013 that there is no record ever available in the office of the Respondents and even the Deputy Commissioner Office, DIKhan was also unaware regarding the said impugned order. Copies of Application under RTI Act along with the respective replies are jointly annexed as Annexure-D.

7. That the Petitioner requested the Respondents to Withdraw/Cancel the impugned termination order dated 08/02/2012 and to restore the services of the petitioner with all back benefits but in vain.
8. That feeling aggrieved by the impugned termination order dated 08/02/2012, and in-actions of the Respondents the Petitioner does not have any other option except to knock at the door of this Honorable Court, by way of instant Writ Petition, inter alia, the following grounds.

GROUNDS:-

- a. That when the husband of the petitioner submitted the complaint to citizen's portal of Pakistan in this respect and astonishingly it was

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EXAMINOR

Peshawar High Court Bench,

District Council Khan

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replied, "Closed-Relief cannot be granted", but interestingly it is replied to the quarter concerned by the respondents that there is no record of the impugned order. Copies of the complaint along with remarks and results are jointly annexed as Annexure-E.

b. That it is also important and interesting aspect that on one pretext the Respondents replied to the quarter concerned in the complaint that there is no record available in the office of the Respondents and on the other pretext the Respondents reply that no relief can be allowed to the Petitioner which is a clear contradiction.

c. That now it is too much strange enough that the Petitioner is totally unaware regarding her state of services because when there is no termination order of the Petitioner in field then how the pays of the Petitioner has been stopped and how the Respondents did not allow the Petitioner to join her services or to restrain the petitioner to attend the School.


d. That the Petitioner served in the department for almost two years and seven months and during the said period the services of the Petitioner was not regularized and according to the appointment order of the Petitioner, the Petitioner was serving in the department on temporary basis and thus this Honorable court is having the jurisdiction to entertain the Writ of the Petitioner.

e. That the impugned termination of the petitioner is based on mala fide, without jurisdiction, without, lawful authority and is having no binding effects upon the rights of the Petitioner.

f. That due to the said behavior conduct of the Respondents the petitioner has become overage and due to this the petitioner is deprived to be appointed in any other department which is totally against the fundamental rights.

g. The petitioner was appointed in accordance with the rules and recruitment policy and further his appointment was finalized by the Respondents after observing and all the legal and codal formalities but the services of the Petitioner was terminated without issuing any show cause or prior notice which is against the norms of natural justice because the petitioner remained unheard which is against the golden

Filed today
21/02/2011
2011-02-21
Registrar

ATTESTED


EXAMINOR

Patwar High Court Bench,

Patwar High Court Bench,
21/02/2011

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principle of natural justice. Moreover the impugned termination order is against the judgments of the apex courts.

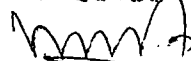
- h. That no notice or explanation has been obtained from the petitioner which is legally compulsory regarding the termination of service of petitioner particularly when the order of the termination by itself is without record and can be deemed and presumed as a body without soul.
- i. That interest of the Petitioner have been materially prejudiced by the act of the Respondents and his fundamental rights envisaged under Articles 4 to 25 of the Constitution of Islamic Republic of Pakistan, 1973, especially to be dealt with in accordance with law have been blatantly violated, thus calling for interference by this Honorable Court.
- j. That the impugned termination order is against the law void ab-initio and illegal. Hence, is liable to be set aside.
- k. That notices are being duly served under the dictates of procedural law of Honorable Peshawar High Court. Copies of the notices along with postal receipts are enclosed as Annexure-F.
- l. That the counsel for the petitioners may be allowed to raise additional grounds during the course of arguments.

On Acceptance/Issuance of the instant Writ Petition under the following prayers;

A. To direct the respondents to act in accordance with law and to restore the services of the petitioner with all back benefits w.e.f the alleged illegal impugned termination letter no.1520-1602 back dated 08/02/2012 with further directions to produce the relevant record of the letter no.1520-1602 dated 08/02/2012.

B. To direct the Respondents to Cancel/Withdraw the illegal, bogus and concocted termination order of the Petitioner vide alleged letter no.1520-1602 dated 08/02/2012 being having no record in the office the

ATTESTED



EXAMINOR

Peshawar High Court Bench,
Dera Ismail Khan

22-11-2021

Filed today
23/11/2021
M. A. P. P. S. Khan
23/11/2021

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Respondents and the same be declared as void and in effective over the rights of the Petitioner.

C. To issue the directions to the Respondent No.1 to take necessary action (criminal and departmental) against the responsible respondents who issued the illegal termination order vide letter no.1520/1602- dated 08/02/2012 and deprived the Petitioner from her valuable rights.

Any other relief which this Honorable court deems fit in the given circumstances may also be granted to the Petitioner.

Dated: 05/08/2021

Your Humble Petitioner

M. Zia

Fozia Malik
Through Counsel

Burhan

Burhan Datif Khaisori
Advocate Supreme Court,

Filed today
Additional Registrar
05/08/21
[Signature]

CERTIFICATE:

It is certified that the instant Writ Petitioner is lone petition on the subject matter. There is no other application in any court of law.

M. Zia

Petitioner
Fozia Mailk

AFFIDAVIT:

I, Fozia Malik D/o Malik Allah Nawaz W/o Malik Gohar Saeed R/o Khanukhel, Tehsil Paharpur, District Dera Ismail Khan, the petitioner, do hereby solemnly affirm on oath that contents of the Writ Petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable court.

M. Zia

Deponent
Fozia Malik

Identified by

[Signature]

Malik Gohar saeed S/o Malik Afzal Khan
R/o Khanukhel, Tehsil Paharpur, DIKhan
CNIC12103-1475151-5

Name: Fozia Malik
D/o Malik Allah Nawaz
in the identification of
Malik Gohar Saeed Khan

On this 05 day of Aug 2021

Verified the contents

Affirmation before me on oath

No. 2827 Dated: 05/08/21

[Signature]

EXAMINER
Peshawar High Court Bench,
Dera Ismail Khan


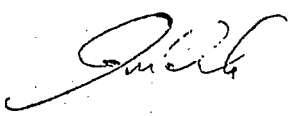
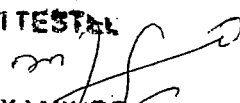
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D.I. Khan Bench
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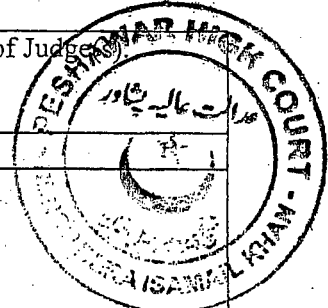
22-11-2021

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PESHAWAR HIGH COURT, D.I.KHAN BENCH

FORM OF ORDER SHEET

Date of Order or proceedings	Order or other proceedings with signature of Judge
(1)	(2)
10.11.2021	<p><u>W.P.No.430-D/2021 with C.M.No.742-D/2021.</u></p> <p><u>Present:</u> Mr. Burhan Latif Khaisori, Advocate for petitioner.</p> <p style="text-align: center;">***</p> <p><u>ABDUL SHAKOOR, J.-</u> After arguing the case at certain length, the learned counsel representing the petitioner wants to withdraw the instant petition in order to approach the proper forum for redressal of his grievances.</p> <p>2. Dismissed as withdrawn.</p> <p><u>Announced.</u> <u>Dt: 10.11.2021.</u></p> <div style="text-align: right;">  JUDGE </div> <div style="text-align: right; margin-top: 20px;">  JUDGE </div> <div style="text-align: right; margin-top: 20px;"> ATTESTAL  EXAMINOR Peshawar High Court Bench, Dera Ismail Khan </div>



Office
Star
11/11

Imran/*

(D.B)
Hon'ble Mr. Justice Abdul Shakoor
Hon'ble Mr. Justice Sahibzada Asadullah

22.11.2021

(84) Annex - "N"



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Tell: 09669280131

No. 24

Dated DIKhan the 01/01 /2022

To

The Malik Gohar Saeed (Complainant)

Subject: PROVISION OF REQUIRED INFORMATION UNDER RTI ACT 2013.

Memo:

Reference letter No. RTIC/AR/1-7961/2021.

The relevant record of Dispatch register is hereby attached for your information please.

DISTRICT EDUCATION OFFICER
(MALE) DIKHAN

Dated: DIKhan the 01/01 /2022

Endst No. 25

Copy for information to:

1. The Assistant Registrar: KP Information Commission, Peshawar.

DISTRICT EDUCATION OFFICER
(MALE) DIKHAN

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Year	Project Name	Location	Notes	Signature
1952	A. Director - P.N.	Ill	Report of International	W. S. J.
1954-59	D. B. Condon	Ill	Report of International	W. S. J.
1960	D. P. O. O. L.	Ill	Report of International	W. S. J.
1961	D. P. O. O. L.	Ill	Report of International	W. S. J.
1962	D. P. O. O. L.	Ill	Report of International	W. S. J.
1963	D. P. O. O. L.	Ill	Report of International	W. S. J.
1964	D. P. O. O. L.	Ill	Report of International	W. S. J.
1965	D. P. O. O. L.	Ill	Report of International	W. S. J.
1966	D. P. O. O. L.	Ill	Report of International	W. S. J.
1967	D. P. O. O. L.	Ill	Report of International	W. S. J.
1968	D. P. O. O. L.	Ill	Report of International	W. S. J.
1969	D. P. O. O. L.	Ill	Report of International	W. S. J.

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1566	M. S. Com. J. S. S. S.		
1565	M. S. Com. J. S. S. S.		
1564	M. S. Com. J. S. S. S.		
1563	M. S. Com. J. S. S. S.		
1562	M. S. Com. J. S. S. S.		
1561	M. S. Com. J. S. S. S.		
1560	M. S. Com. J. S. S. S.		
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1556	M. S. Com. J. S. S. S.		
1555	M. S. Com. J. S. S. S.		
1554	M. S. Com. J. S. S. S.		
1553	M. S. Com. J. S. S. S.		
1552	M. S. Com. J. S. S. S.		
1551	M. S. Com. J. S. S. S.		
1550	M. S. Com. J. S. S. S.		
1549	M. S. Com. J. S. S. S.		
1548	M. S. Com. J. S. S. S.		
1547	M. S. Com. J. S. S. S.		
1546	M. S. Com. J. S. S. S.		
1545	M. S. Com. J. S. S. S.		
1544	M. S. Com. J. S. S. S.		
1543	M. S. Com. J. S. S. S.		
1542	M. S. Com. J. S. S. S.		
1541	M. S. Com. J. S. S. S.		
1540	M. S. Com. J. S. S. S.		
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1532	M. S. Com. J. S. S. S.		
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1512	M. S. Com. J. S. S. S.		
1511	M. S. Com. J. S. S. S.		
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1509	M. S. Com. J. S. S. S.		
1508	M. S. Com. J. S. S. S.		
1507	M. S. Com. J. S. S. S.		
1506	M. S. Com. J. S. S. S.		
1505	M. S. Com. J. S. S. S.		
1504	M. S. Com. J. S. S. S.		
1503	M. S. Com. J. S. S. S.		
1502	M. S. Com. J. S. S. S.		
1501	M. S. Com. J. S. S. S.		
1500	M. S. Com. J. S. S. S.		

NOTICE
 1955, or 1956
 1957, 1958, 1959, 1960
 1961, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970

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 1970

2) - The
 1955, 1956
 1957, 1958, 1959, 1960
 1961, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970

68

1967 - 1968

Dec 23, 68

1968

Presidents Spk
Exec Comtee Mgrs

Exec Comtee general

1967

add'l board members

1968
Presidents Mgrs & Board

contracts of exec comtee

1969
Director Eds W.P.K.

D.O.M. D.P.K.

D.A. O.P.K.

1970
D.P.K. & Council

1971
Director Eds W.P.K.

1972
D.C. Council

1973
D.P.K. & Council

1974
D.P.K. & Council

1975-78
D.P.K. & Council

1979-82
D.P.K. & Council

1983-86
D.P.K. & Council

1987-90
D.P.K. & Council

1991-94
D.P.K. & Council

1968-1970
1971-1972
1973-1974
1975-1978
1979-1982
1983-1986
1987-1990
1991-1994

1909-10

1910-11

1911-12

1908

D.D. B. M. D. D.

Mississippi of Chipp. when

1908

Mississippi of Chipp. when

wrong posted

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wrong posted

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Mississippi of Chipp. when

wrong posted

1504-6 (Cous) DPH

D. O. Dye

R. W. - D. W. - E. W.

1507-9 B-1-5-2 DPH

P. Anderson

PPM - D. W. - E. W.

1510-11

D. W. - E. W.

D. H. - E. W.

15344

Comstock

1515

D. H. - E. W.

1518-77

Comstock

1518-20

Comstock

1521-23

D. H. - E. W.

1524-25

D. H. - E. W.

1526

D. H. - E. W.

1527-30

D. H. - E. W.

Delimit case according to...

Sanitation - keep in file...

APP - books in...

W. H. - E. W.

Comstock

Comstock

Comstock

P. Council Sanitation

Sanitation

D. H. - E. W.

APP - D. W. - E. W.

APP - D. W. - E. W.

Sanitation

Sanitation

APP - D. W. - E. W.

92

1940-42

1936-39

1932-35

1931

1927-30

N. Mills section

Post Office

D. C. O. Dir

Applications persons for the benefit of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

D. A. O. Dir

Director of P. A. C.

Director of P. A. C.

1551-53 + Martins 2 m's / Gordon / So. den - q. in 8 m's. 11/17/94

D. P. O. Dr.

1551-55 - 04.0-0 (B) Dr. ✓ Sample of 2 P. ... m's / Gordon

D. P. O. Dr.

1556-60 - D. C. - 0 Dr. ✓ Allowance of ... m's / Gordon

D. O. m Dr

1561-62 - G. H. 1st floor Dr. ✓ ... m's / Gordon

D. P. O. Dr.

1563-66 - Office ... m's / Gordon

Office ... m's / Gordon

1567 - G. H. S. m's 800m ✓ ... m's / Gordon

D. P. O. Dr.

1568-69 - D. P. O. Dr. ✓ ... m's / Gordon

D. P. O. Dr.

1570 - G. H. S. m's 3 Dr. ✓ ... m's / Gordon

G. H. S. m's 3 Dr.

1571-72 - D. P. O. Dr. ✓ ... m's / Gordon

D. P. O. Dr.

1573 - D. C. - 0 Dr. ✓ ... m's / Gordon

D. C. - 0 Dr.

1574 - D. C. - 0 Dr. ✓ ... m's / Gordon

D. C. - 0 Dr.

1515-

D.C. - 0 Dik

17

4

1st Sec 2108

1574

D.H. - 0 Dik

Refuse of consent

Appearance

~~1575~~

Allegedly

1/1

False Appearance

1575

The Station Command Dik

Entry Court Pass

(46)

1576

D.B.S (B)

1577-79

Commission

GOHS. Belle Garden

Dec 11 to Sep

14-5-02-2012

10/10/12

1580

D.C. - 0 Dik

6-9-2012

11/1/12

12/10

12/10/12

1581-03

D.C. - 0 Dik

11/1/12

12/10

12/10

12/10/12

1583

D.C. - 0 Dik

11/1/12

12/10

12/10

12/10/12

1584

D.C. - 0 Dik

11/1/12

12/10

12/10

12/10/12

1586

1586

1587

1588

1589

1590

1591

1592-97

1598

1599

1600-04

1602-4

1603

PRO. L. C.

D. C. M. L. P. & L. C.

Subcommittee on Education

D. C. M. L. P. & L. C.

M. I. B. L. & L. C.

D. C. M. L. P. & L. C.

D. C. M. L. P. & L. C.

D. C. M. L. P. & L. C.

D. C. M. L. P. & L. C.

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PRO. L. C.

D. C. M. L. P. & L. C.

Subcommittee on Education

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D. C. M. L. P. & L. C.

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Subcommittee on Education

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Subcommittee on Education

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D. C. M. L. P. & L. C.

D. C. M. L. P. & L. C.

(96)

1605-28

DAP DIERM

Referred to Prof in TO Testina
Javel market
241 (Sec) REHS mandev.

1608-11

DO General

DA & SPAC

David Lee / Hon General

Transfer - road
Department

1612-13

Office (General)

Section of M.P. CI 100 R 16. 11/24/41

1614-15

G.A.S. Halligan

at 100 P.P. 1000. Details. 08. 35/20/

1616

G.A.S. Halligan

Business for manual Machine

1617

D.C. - O.D.M.

Miller's performance in records

1618

D.C. - O.D.M.

Carroll's signature & Pension Papers

1619

D.C. - O.D.M.

Carroll's signature & Pension Papers

1620

D.C. - O.D.M.

Carroll's signature & Pension Papers

1621

D.C. - O.D.M.

Carroll's signature & Pension Papers

1612-13
1614-15
1616
1617
1618
1619
1620
1621

(76)

1621

The T.A.O. Division

Release of [unclear]

in 1/14 [unclear] [unclear] Division

1621

The Philadelphia PHS York

Release of [unclear]

1625

The District Coroner's Office
D. K. [unclear]

Answer of D.P.S. - 14

1628

Section 6
LPR & Release

to [unclear]

1627-29

Answer of [unclear] BPS - 05

to make printing - Dec D. J. [unclear]

1630-32

The Philadelphia [unclear] BPS
D 40 [unclear]
[unclear]

order [unclear] of [unclear]

1633-35

D. [unclear]
D. [unclear]
D. [unclear]

Release of [unclear] Reg [unclear] 50 F

1636-

D. C. O. Bell

Empire August 24, 1944

1637

Wangley Dwyer

REP - 1944

1638

D. C. O. Bell

Lewis Frank

(98)

1639-40

Blue S.E. H.S. 11/27 Mary 1942

Nice with Betty 1/24 1945

1641

Onion - 1/23/42 K.M. Baker

Empire 1/23/42 Dine can - 1/26

1642-43

Blue S.E. H.S. 1/23/42

~~Empire 1/23/42~~

1644

Nice 1/23/42 Tolman 1/23/42

Rep/Service 1/23/42

1645-46

1/23/42 Eggs 1/23/42

Rep/Service 1/23/42

1647

1/23/42 Eggs 1/23/42

Rep/Service 1/23/42

99

1651-551

DCO, D/W
DOCHM) [unclear]

Dr. Do (H) W

H/M GIB B/H Cash

H/M G/M's K/L/S

QCH's Remark

1657-61

Er Paderm - [unclear]

DO CND

DAO

H/M de [unclear]

Cincin

Accounting

16.62

DCO D/W

16.63

DCO D/W

16.64

[unclear]

165-64

D-4-0-2-1

Sanction of [unclear]

5/1/75

[unclear]

[unclear]

R/S [unclear] [unclear]
RMS JK 1 [unclear]

Correspondence BPS's [unclear]

Amount of [unclear] [unclear]

[unclear]

[unclear]

16.64

100

165-66

D-A-DIR

Sanction of M.P. - 1975

Director School
Sundergarh

M. A. H. S. 1975/82

Approval for expenditure

1975/82

167

D-C-DIR

RRP work to the R.M.P.S. Education

168-70

D-D. M.P. DIR

D-A-DIR

Project with P.W.D.

171

D-C-DIR

Summary chapters of R.P.

Shree G.P. U.C.

172

D-A-DIR

Revision case 1970

173-74

D-D. M.P. DIR

Project with P.W.D.

175

D-C-DIR

Financial Assistance

176-77

D-D. M.P. DIR

Project with P.W.D.

178

D-A-DIR

Project expenditure of P.P. U.C.

179

D-C-DIR

Grant of 50000/-

180-81

D-D. M.P. DIR

Project with P.W.D.

183

D-D. M.P. DIR

Sanction for expenditure

183

101

1988-93	Director's Office D-C O'Brien D-C M. P. D'...	Recession 68-70 multi-million dollar applied V.I.P. of PST 400-500 people at
1994-99	H.V.S. Water Project Frank Longmire Director RLS Keller D-C O'Brien D-C M. P. D'... D-C M. P. D'... D-C M. P. D'... Frank Longmire	Recession 70-72 multi-million dollar applied V.I.P. of PST 400-500 people at
1900-5	— — —	Recession 72-74 multi-million dollar applied V.I.P. of PST 400-500 people at
1906-11	Director's Office D-C O'Brien D-C M. P. D'... D-C M. P. D'... D-C M. P. D'... Frank Longmire	Recession 74-76 multi-million dollar applied V.I.P. of PST 400-500 people at
1912	D-C O'Brien H.V.P. Project	Recession 76-78 multi-million dollar applied V.I.P. of PST 400-500 people at
1913-14	D-C M. P. D'...	Recession 78-80 multi-million dollar applied V.I.P. of PST 400-500 people at
1915-17	D-C M. P. D'...	Recession 80-82 multi-million dollar applied V.I.P. of PST 400-500 people at

102

1715-17

D-120 D-2
Philip Bar 402

Comptrol

Bill
(R-C)

1718

John's machine

M-C-A-1

1719-22

D-100 MB 15
D-100 D-100
G-100
G-100

Transfer of 1000000
A.W. G. Remond

1723

Director of passport
Office 1072

Account of international passport possibilities
P.S. 1073

1724-28

D-100 D-100
D-100 D-100
M.P. 100's 100's

M.P. 100's 100's
M.P. 100's 100's
M.P. 100's 100's

1729

D-100 D-100
M.P. 100's 100's

M.P. 100's 100's
M.P. 100's 100's

1730-32

D-100 M.D. 1
M.P. 100's 100's

M.P. 100's 100's
M.P. 100's 100's

25

103



**OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) D.I.KHAN**

0966-9280133 emisdeofdik@gmail.com

No. 52291

Dated 20/10 2021.

To

The
Performance Delivery Unit
(PMDU)
Pakistan Citizen Portal (PCP)

Subject:

INFORMATION

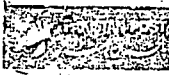
Memo:

I have the honour to submit that required information regarding Ldct. no. 1520-1497 dated 03-02-2012, the all dispatch register in the custody of DEO(M) DIKhan because the bifurcation / establishment of the offices of DEO(M/F) , the all previous record-related to the EDO EASE DIKhan e.g. dispatch register etc. in the custody of DEO(M) DIKhan.

You are requested to please approach to the DEO (M) DIKhan for the said

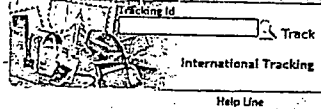
attend

Amdqgh
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN



Pakistan Post.
 EMTTS - Express Mail Track &
 Trace System
 Delivery & Information at lightning speed

(104)



Result of your query

Article Tracking No: RGL57877567
 Booking Office: D.I.Khan Delivery Office: Peshawar

Article Tracking Details

November 29, 2021

4:13 PM	D.I.Khan	Received at D.I.Khan DMO
4:13 PM	D.I.Khan	Dispatch from district mail office D.I.Khan to district mail office Peshawar (BagID: BAG21718430)

November 30, 2021

7:52 AM	Peshawar	Dispatch from DMO Peshawar to delivery office Peshawar GPO (BagID: BAG21716724)
10:44 AM	Peshawar GPO	Sent out for delivery
4:29 PM	Peshawar GPO	Delivered at delivery office Peshawar GPO to ADDRESSEE

29/11/2021

105

No. 1232

Insurance Notices see reverse.
RGL57877567 in case of
uninsured note than
the initial weight prescribed in the
Post Office Guide or in which no
acknowledgment is due.

R. Ps. *Jo*

Education

Received a registered
addressed to

Date Stamp

Initials of Receiving Officer

Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures)

Direct Post (in words) 2.50

Insurance fee Rs.

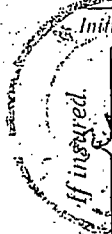
Weight

Kilo

Name and
address
of sender

Perman

Grams



2/11

(106)
Annex - "O"

بخدمت جناب ڈائریکٹر تعلیم صاحب کے پی کے پشاور

عنوان :- ڈیپارٹمنٹل ایپل برائے بحالی ملازمت نیو کراؤنڈ بوجہ جعلی دستاویزات غیر قانونی برطرفی

آرڈرز "عدم دستیابی ریکارڈ" اور "عدم دستیابی فائل شوکار نوٹس"

جناب عالی!

گزارش یہ ہے کہ سائلہ محکمہ تعلیم میں 01-10-2007 کو تمام قانونی تقاضے پورے کرتے ہوئے بھرتی ہوئی اور سائلہ نے محکمہ تعلیم ڈیرہ اسماعیل خان میں بطور CT ٹیچر بیس 2 سال 7 ماہ ریگولر سروس سرانجام دی ہے اور سائلہ اعلیٰ تعلیم یافتہ (M.A, M.Ed, CT) ہے۔ جناب عالی سائلہ کی جعلی برطرفی 2012 میں اس وقت کے EDO ڈیرہ اسماعیل خان نے آرڈر نمبر 1520-1602 مورخہ 08-02-2012 کو بغیر کسی فائل شوکار نوٹس جاری کیئے اور بغیر ٹرینیشن آرڈر کی کاپی سائلہ کو دیئے غیر قانونی طور پر اس آرڈر کے جاری کرنے سے پہلے ہی تنخواہ بند کرتے ہوئے سکولوں سے فارغ کر دیا گیا تھا۔ بعد ازاں جب سائلہ کو جعلی ٹرینیشن آرڈر کی کاپی ملی تو ڈیپارٹمنٹل ایپل کا وقت بھی گزر چکا تھا۔ مذکورہ آرڈر جس میں سائلہ سیریل نمبر 42 پر موجود ہے کاپی لف ہے۔ بعد ازاں میرے شوہر ملک گوہر سعید نے جب میری برطرفی کے آرڈر کی ویریفیکیشن RTI ایکٹ 2013 اور PMDU پورٹل کے ذریعے کروائی تو اس وقت کے Appointing / Terminating Authority، ڈیرہ اسماعیل خان اور آج کے DO(M) ڈیرہ اسماعیل خان نے PMDU پورٹل پر کیلیٹ نمبر KP291020-87523116 مورخہ 22-12-2020 میں جواب دیا کہ اس برطرفی آرڈر کا ہمارے دفتر میں کوئی ریکارڈ موجود نہیں ہے۔ پھر ہم نے فی میل کی موجودہ Appointing / Terminating Authority، DO(F)، PMDU کو پورٹل پر اپروچ کیا۔ تو انہوں نے بھی کیلیٹ نمبر KP210421-88269277 مورخہ 16-05-2021 میں جواب دیا کہ اس آرڈر کا ہمارے پاس بھی کوئی ریکارڈ نہیں ہے۔ (نوٹ:- DO(M/F) دونوں کو PMDU پورٹل پر آپ جناب نے ہمیں فارورڈ کیا تھا۔ جس کا جواب آپ نیٹ پر پورٹل میں آپ خود بھی چیک کر سکتے ہیں)۔ مزید اس آرڈر پر جہاں جہاں کاپی ٹوانفارمیشن کی گیا یعنی سیکریٹری تعلیم صاحب، ڈائریکٹر تعلیم صاحب، ڈپٹی کمشنر ڈیرہ اسماعیل خان صاحب سب سے ہم نے بذریعہ درخواست RTI ایکٹ 2013 کے قانون کے توسط سے معلوم کیا تو سب نے بشمول آپ جناب کے آپ نے بھی کاپی ملنے سے لاعلمی کا اظہار کیا۔ تمام جواب اور سکریٹن شٹ درخواست کے ہمراہ لف ہیں۔ یعنی برطرفی آرڈر جعلی ثابت ہوا۔ بعد ازاں میرے شوہر ملک گوہر سعید نے آپ جناب کو مورخہ 19-05-2021 کو درخواست برائے "Fake Order" Cancellation کے عنوان سے جمع ثبوت تفصیلی فائل

PTO...

(107)

آپ جناب کو بذریعہ ڈاک ارسال کی۔ جو کہ آپ جناب کو مورخہ 22-05-2021 کو ڈائریکٹوریٹ پشاور میں موصول ہوئی۔ بعد ازاں کوئی خاطر خواہ کارروائی نہ ہونے پر پھر ساکنہ نے ہائی کورٹ ڈیرہ اسماعیل خان بیج سے رجوع کیا کیس Fozia Malik vs Government Of KPK W.P.No.430-D/2021. جس میں 10/11/2021 کو یہ طے پایا کہ پراپر فورم پر رجوع کیا جائے۔ آرڈر شیٹ کاپی لف ہے۔ اس کے بعد ساکنہ نے آپ جناب کو آج 29/11/2021 کو ڈپارٹمنٹل اپیل درج کروائی کیوں کہ ساکنہ کا پہلا اپیل کا فورم آپ جناب ہیں۔

جناب عالی! جب سب اتھارٹیز خود تسلیم کر رہی ہیں کہ ٹرینیشن آرڈر کا کوئی ریکارڈ نہیں۔

اور C.T. فی میل پوسٹ کی موجودہ Appointing / Terminating Authority (DOF) ڈیرہ اسماعیل خان سیٹرن پورٹل کیسٹ نمبر KP210421-88269277 پر ایک طرف تو ریکارڈس میں کہہ رہی ہیں کہ:-
"There is no record of this order in DO(F) Office DIKhan" اور پھر اسٹیٹس میں لکھ رہی ہیں:-

"Closed-Relieve cannot be granted" جناب عالی یہ تو کھلا تضاد ہے کہ ایک طرف تو جعلی آرڈر کا اظہار کیا جا رہا ہے اور دوسری طرف ریلیف دینے سے انکار کیا جا رہا ہے۔

(1) تعزیرات پاکستان 1860 دفعہ 471 کی روح سے کسی بھی کاغذات کا ایک حصہ بھی جعل سازی سے بنایا گیا ہو تو وہ مکمل کاغذات جعلی شمار ہوں گے۔

(2) اگر کسی سول سرونٹ کی اپیل سروس ٹریبونل اور سپریم کورٹ خارج کر دے تو پھر بھی سول سرونٹ نئے گراؤنڈ پر دوبارہ اپیل دائر کر سکتا ہے۔ (PLJ 1996 S.C 660)۔

(3) سپریم کورٹ نے اپنے حالیہ فیصلہ میں قرار دیا ہے کہ لمبے عرصے تک نوکری کرنے والے ملازم کو ڈس مس جیسی بڑی سزا دے کر اسے سروس کے فوائد سے محروم کرنا محکمہ کی سنگین زیادتی ہے (2020 SCMR 1018)۔

(4) کوئی بھی سول سرونٹ کسی انکوآری رپورٹ کو عدالت میں چیلنج نہیں کر سکتا کیوں کہ انکوآری کوئی فائنل حکم نامہ نہ ہے۔ 2019 PLC (C.S) N 34

(5) ریگولر انکوآری کے بعد ملازم کو فائنل شوکاز جاری کرنا لازمی ہے بصورت دیگر کارروائی کا عدم ہوگی۔

2000 PLC (C.S) 857

PTO...

108

لہذا تمام حقائق کو مد نظر رکھتے ہوئے جب میری برطرفی کا کوئی وجود ہی نہیں ہے تو آپ جناب ڈائریکٹر تعلیم صاحب سے گزارش ہے کہ سائلہ کی ڈیپارٹمنٹل اپیل کو منظور کرتے ہوئے اور سائلہ کی برطرفی کے آرڈرز جس کا وجود ہی نہیں ہے اور بغیر فائنل شوکاز نوٹس کے جاری کیئے گئے ہیں۔ کو جعلی قرار دیتے ہوئے سائلہ کی تنخواہ جس دن سے یعنی 30/04/2010 سے بند کی گئی ہے اس دن سے کھولے جانے کے احکامات جاری فرمائیں اور سائلہ کو تمام سابقہ و موجودہ مراعات اور تمام قانونی حقوق کے ساتھ نوکری پر بحال کر کے مشکور ہونے کا موقع فراہم کیا جائے۔ جناب عالی آپ سے سائلہ کو دادرسی کی امید ہے کہ آپ ضرور انصاف کریں گے۔

جناب عالی کی عین نوازش ہوگی۔

مورخہ: 29 نومبر، 2021

ارض

Fozia Malik D/O Malik Allah Nawaz W/O Malik Gohar Saeed

(M.A, M.Ed)

Ex-CT, Teachers GGHS Kot Jai, D.I.Khan.

CNIC No: 12103-4119537-8

Mobile No: 0300-9094797

Postal Address: W/O Malik Gohar Saeed, Village Khano Khail, P/O Kotjai,
Tehsil Paharpur, District Dera Ismail Khan.

Signature: _____

M. Zia*
29/11/2021

COMPLAINT CODE
 KP291020-87523116
 08/29/2020
 STATUS
 See Details / تفصیلات دیکھیں

DEO (Male) ③
 (109)

DEC 22
 2020



FROM

DO Education (M), Dera Ismail Khan ✓

STATUS

Forwarded



TO

DO Education (F), Dera Ismail Khan

REMARKS

تبصرہ

Respected Madam, I have discussed the matter with DEO (M), and according to him the said complaint is related to Your good office. At that time of EDO system, both DEO (F) and DEO (M) had separate diary and dispatch registers. there is no record of found in our Dispatch register having Endst no. 1520-1602 dated 08-02-2012. So the complaint is forwarded back to your good office. thanks ✓

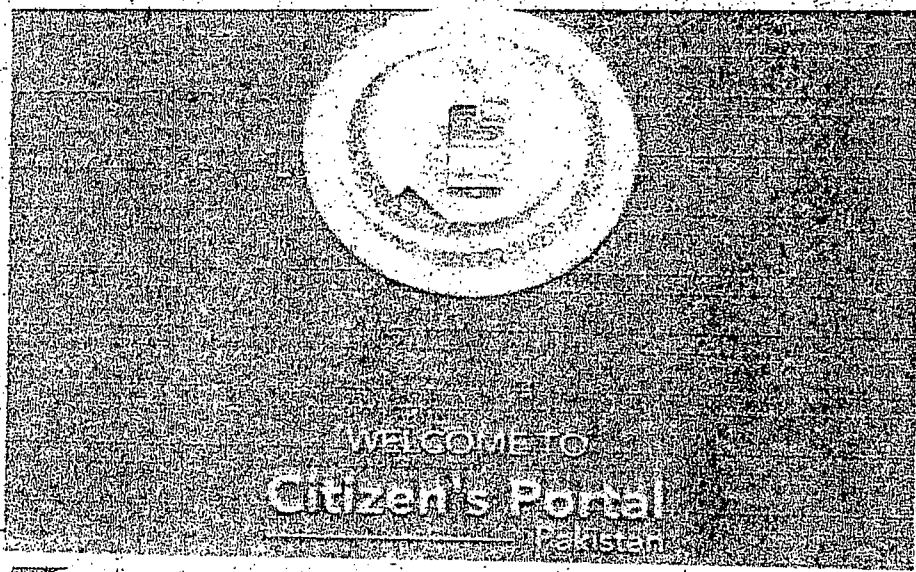
REMARKS

تبصرہ

Dear citizen, thanks for your complaint. your complaint is forwarding to DEO (F) Dkhan as the complaint is related to them.

110

Dear (F) reply



COMPLAINT CODE
 23032

KP210421-88269277

16 Apr 21 2021

STATUS
 Closed - Relief cannot be granted

Complaint History

2021

MAY 16
2021



FROM
DO Education (F), Dera Ismail Khan ✓

STATUS

closed - Relief cannot be granted

REMARKS

تبصرہ

Dear Citizen there is no record of this ✓
order in DEO(F) office D.I.Khan



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR.

(111)

Director Reply

No. 5920 /File No. Dairy Branch/R.T.I.
Dated Peshawar the: 30/01/2020

To

The A.D (R.T.I & Ombudsman)
Local Directorate.

Subject: PROVISION OF INFORMATION UNDER R.T.I ACT 2013.

I am directed to refer to the subject cited above and to state that the "Order" of EDO D.I.Khan bearing No. 1520-1602 dated 08-02-2012 has not been received to this Directorate as per Dairy Register.

The case is submitted for your kind information and further necessary action please.

4-29-1-2020
Dealing Assistant (Dairy Branch)
Directorate of E&SE KPK

29/1/20
Assistant Director (Admin)
Directorate of E&SE KPK

Endst No. _____/

Copy forwarded to the: -

1. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Master File.

- sd -
Assistant Director (Admin)
Directorate of E&SE KPK

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Secretary, Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)/5-1/General Misc./2018
Dated Peshawar the 27.01.2020

To

The Monitor Officer-I,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa,
Peshawar.

Subject: - PROVISION OF INFORMATION UNDER RTI ACT, 2013

Dear Sir,

I am directed to refer to your letter No. MO-I/ESRU/E&SE/Malik Gohar Saeed/2019 dated 14.01.2020 in respect of Mr. Malik Gohar Saeed S/O Malik Muhammad Afzal Khan, resident of Khano Khel, Kotjai, Tehsil Pharpur, District D.I Khan and to state that this section has no information about appointment/termination of CT, etc. which is a district cadre post and relates to Director E&SE/DEO (M/F) concerned, therefore the reply on our part may be considered as Nil, please.

Yours faithfully,

SECTION OFFICER (PRIMARY)

Endst: No & date even
Copy forwarded to:-

PS to Secretary, Elementary & Secondary Education Department, Peshawar.

SECTION OFFICER (PRIMARY)

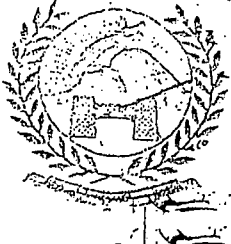
on file pl

A. S. H.

15
28/1/2020

MO-I
Forwarded

30/1/2020



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GOVERNMENT OF KHYBER PAKHTUNKHWA
INFORMATION COMMISSION
Near BRT Abdara Station, Behind Jabar Flats,
Arbab Colony, University Road, Peshawar
Email: complaints.kprti@kp.gov.pk
Ph: +92-91-9216557
Fax: +92-91-9216561

DC Reply

(COMPLAINT NO. 6714)

REF: -MR. MALIK GOHAR VS Deputy-Commissioner, DIK.

PROCEEDINGS

(11th March, 2021)

Mr. Abdul Haleem, Superintendent, representative of Deputy Commissioner Office, DIK, (referred hereinafter as public body) appeared for hearing before this Commission on 11th March, 2021. During the proceeding he contended that no such order as mentioned at serial No. 1 of the request neither the said order was received nor available in the record of office of Deputy Commissioner. However, available record was provided to this Commission.

DECISION:

Having heard, the Commission decided to forward the record received from the public body to the complainant and thus the complaint stands disposed off.

-sd-

Chief Information Commissioner

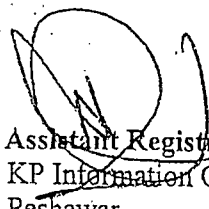
-sd-

Commissioner-II

Endst No. & date: KPIC/AR/1-6714/2020/ 11070-72
Copy to:-

dated: 31 March, 2021.

1. Additional Deputy Commissioner/PIO, Office of the Deputy Commissioner, DI. Khan.
2. Mr. Abdul Haleem, Superintendent, Office of the Deputy Commissioner, DI. Khan
3. Mr. Malik Gohar (Complainant).



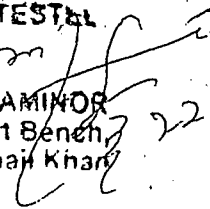

Assistant Registrar
KP Information Commission,
Peshawar

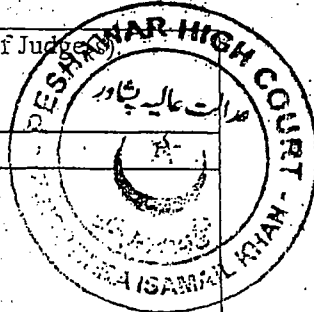
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11

PESHAWAR HIGH COURT, D.I.KHAN BENCH

FORM OF ORDER SHEET

Date of Order or proceedings (1)	Order or other proceedings with signature of Judge <i>Fozia Malik vs Govt of KPK</i> (2)
10.11.2021	<p><u>W.P.No.430-D/2021 with C.M.No.742-D/2021.</u></p> <p><u>Present:</u> Mr. Burhan Latif Khaisori, Advocate for petitioner.</p> <p style="text-align: center;">***</p> <p><u>ABDUL SHAKOOR, J.-</u> After arguing the case at certain length, the learned counsel representing the petitioner wants to withdraw the instant petition in order to approach the proper forum for redressal of his grievances.</p> <p>2. Dismissed as withdrawn.</p> <p><u>Announced</u> <u>Dt:10.11.2021.</u></p> <div style="text-align: right;">  JUDGE  JUDGE </div> <div style="text-align: center; margin-top: 20px;"> ATTESTAL  EXAMINOR Peshawar High Court Bench, Dera Ismail Khan </div>



Office
11/11

11-11-2021

Imran/*

(D.B)
Hon'ble Mr. Justice Abdul Shakoor
Hon'ble Mr. Justice Sahibzada Asadullah



G.R.No. 5157
 Application for admission on 20-11-021
 Copy No. 072
 No of 040
 Copy 1
 Total 22-11-021
 Copy 22-11-021
 Copy

m/s
 22-11-2021

Certified to be true copy

m/s
 22-11-2021

EXAMINER
 Peshawar High Court Bench D.K.K.
 Authorized Under Section 97
 Qanoon-a-Shahadat-Act

(115)

Annex — "P"

(12)

OFFICE THE EXECUTIVE DISTRICT OFFICER (E&SE) D.I.Khan

ORDER:

In pursuance of order dated 27-10-2011 of the KPK Service Tribunal in service appeal No. 1407/2010 and other connected appeals, committee headed by the Secretary to Govt. of Khyber Pakhtunkhwa (E&SE) Department considered the cases of the appellants and similar placed persons and came to the conclusion that the appointment of the following CTs (Female) was illegal, irregular and void ab-initio in terms of rule 10(2) of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989 and prescribed method of recruitment. On the recommendation of the committee contained at page 103-104 of the enquiry report, their so called services are hereby terminated.

S. No	Appeal No/Year	Name of appellant	Father's Name	School
1	Nil	Fatecha Niazi	Allah Bakhsh	GGMS Adil Sipra/Wanda Lali
2	1849/10	Shahnaz Bibi	Muhammad Nawaz	GGMS Musa Zai Sharif/GHS Kot Jai/GMS Paharpur
3	2592/10	Nasim Imrana	Choudhary Nabi Bakhsh	GGMS Athog
4	1532/10	Naheed Akhter	Muhammad Rafique	GGMS Bigwani Shumali/GGHS Musazai
5	Nil	Fozia Shaheen	Shah Nawaz	GGMS Potah
6	2181/10	Saima Aziz	Aziz ur Rehman	GGHS Rehmani khel/Kot Jai/No.4 DIKhan
7	2583/10	Azra Bibi	Ghulam Hussain	GGMS Kachi Kath Garh
8	2475/10	Shahnaz Akhter	Jehangir	GGHS No.9 Dinpur/GGHSS Kulachi
9	2495/10	Qazi Abdul Hafeez	Qazi Abdur Rahim	GGMS No.1 DIKhan
10	2625/10	Naaila Yasmin	Muhammad Usman	GGHS Bahari Colony
11	2491/10	Rukhsana Bibi	Muhammad Shafi	GGMS Ruknow
12	1530/10	Samina Mustafa	Abdul Mustafa	GGMS Rahmani Khel/Chah Mughal Wali
13	3163/10	Tasleem Akhter	Gul Muhammad	GGMS Wanda Lali
14	2326/10	Sahira Hassan	Ahmed Hassan	GGHS Paharpur/Kech
15	2546/10	Saeeda Bibi	Imam Din	GGMS Roda
16	2723/10	Jamila Shaheen	Ubaid Ullah	GGMS Himat
17		Samina Nureen	Ahmad Din	GGMS Musazai
18	2038/10	Aneela Sarfarz	Sarfaraz	GGHS Kachi Paind Khan

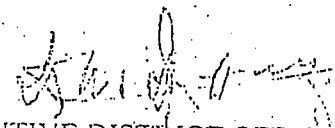
19	3052/10	Lubna Sadia	Qamar ud Din	GGMS Paharpur
20	Nil	Kousar Yasmeen	Ghulam Yaseen	GGMS Kiri Alizai
21	Nil	Tahira Anjum	Qamar un Din	GGHS Ratta Kulachi
22	2708	Kalsoom Bibi	Haji Muhammad Bakhsh	GGHS Bigwani Shumali
23	2499/10	Rehana Afzal	Muhammad Afzal	GGHS Muryali
24	2328/10	Rozina Nisar	Sher Bahadar	GGHS Kot Jai
25	1972/10	Amna Begum	Muhammad Sultan	GGMS SaraGara/GGHS Lar
26	2332/10	Ishrat Jehan	Khurshid Hussain	GGHS Paharpur
27	2492/10	Nazeera Bibi	Allah Nawaz	GGHSS Kulachi
28	2176/10	Rizwana Bibi	Rabnawaz Khan	GGHS Prova
29	2489/10	Neelam Nisar	Nisar Ahmed	GGMS Ijaz Abad
30	2794/10	Fozia Saeed	Saeedullah	GGHS No.4 D I Khan
31	2367/10	Asma ul Husna	Ghulam Abass	GGMS Saidi Wali
32	2169/10	Ruqiya Bibi	Bahsir Ahmed	GGHSS Paharpur/GGHS Kiri Shamozai/Ramak/GGHSS Paroa
33	2504/10	Rubina Eibi	Fazal Rehman	GGHS No.9 DIKhan/GGHSS No.6 DIKhan
34	2506/10	Riffat Malik	Malik Nazir	GGMS Sara Garah/Jetta
35	2687/10	Saira Jabeen	Hamidullah	GGHS Muryali/Malana
36	2505/10	Attia Naz	Muhammad Bashir	GGHS Sadu Wali No.2
37	25 1/10	Ruqiya Bibi	Malik Illahi Bakhsh	GGHS Ramak/GGHSS Paroa/GGMS Dhapan Wali
38	2497/10	Asia Yasmin	Kaleemullah	GGHS No.6
39	2168/10	Kousar Parveen	Ghulam Farid	GGHS Prova
40	1966/10	Syed Hiza Batool	Syed Hasham Shah	GGHS Wanda Mozam
41	33 1/10	Gohar Sultana	Muhammad Nawaz	GGMS Gilotti
42	196 3/10	Fozia Malak	Malak Allah Nawaz	GGHS Kot Jai
43	2494/10	Sahrish	Ghulam Farid	GGHS No.9 Din Pur
44	2666/10	Shagufa Bibi	Abdul Qadoos	GGHS Paniala
45	2399/10	Mussrat Rashid	Abdur Rashid	GGMS Gilotti/Yarik
46	2508/10	Irum Ibrar	Abbar Hussain	GGHS No.2/No.4

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47	2269/10	Shazia Zarin	Shah Muhammad	GGMS Gilotti/Rodu
48	2273/10	Fozia Gul	Haji Ghulam Farid	GGHS Kulachi
49	1967/10	Humaira Mumtaz	Ghulam Ahmad	GGMS Saidu Wali
50	2668/10	Shazia	Munammad Rouf Khan	GGMS Musa Zai Sharif
51	28	Ghazala Bibi	Muhammad Afzal	GGHSS Muryali/Dhawa
52	2642/10	Farzana Hakeem	Hakeemud ud Din	GGHSS No.2 DIKhan
53		Nasreen Khan	Mahmood Khan	GGHS Kacha Mal: Khel/GGMS Mithapur
54	2194/10	Adila Bashir	Muhammad Bashir	GGHS Musazai Sharif
55	2640/10	Zeenat Bibi	Faizullah	GGHSS Paharpur
56	261 9/10	Aisha Bibi	Ahmad Nawaz	GGHS No.6 Chah Syed Munawar
57		Fakhar Batool	Ghulzar Hussain	GGMS Athoge
58	2723/10	Jamila	Ghulam Shabir	GGHS Ramak
59		Chaman Zahra	Hanif Muhammad	GGHS No.5
60		Amber Noreen	Abdul Aziz	GGHS Wanda Mozam
61		Rukhsana Parveen	Ghulam Hussain	GGHS No.4 D I Khan
62		Mehrin Begum	Attaullah	GGMS Ajmal Abad
63	2712/10	Arjumand Bano	Mumtaz Hussain	GGHS Behari Colony
64	548/11	Shazia Bibi	Amamullah	GGMS Dhakki
65		Farkhanda	Rab Nawaz	GGMS Phulari Atnog
66		Shabnam Afroz	Ghulam Yasin	GGMS Kachi Katli Garh
67		Abida Bibi	Habib Ullah	GGMS Madi
68		Farzana Khan	Haq Nawaz	GGHS Lar
69		Safia Mobeen	Muhammad Bakhsh	GGMS Kulachi Wala
70		Mehreen Iram	Imumillah	GGMS Sara Gara
71	2769/10	Samina Zaman	Muhammad Zaman	GGHS Naivela
72	1531/10	Rukhsana Naz	Nazir Hussain Shah	GGMS Gara Essa Khan
73	2330/10	Sadia Naz	Faiz Rasool	GGHS Kech
74	1813/10	Alia Iqbal bibi	Sadiq Hussain	GGHS No.2
75		Nadia	Asadullah Jan	GGMS Hisam

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76		Farzana Bibi	Shah Nawaz	GGMS Sara Gara
77		Naheed Akhtar.	Muhammad Iqbal	GGMS Kulschi Wala
78		Ambreen Mohab	Muhammad Aslam	GGHS Dhakki
79	32/11	Naila Naz	Qayum Nawaz	GGHS Lar

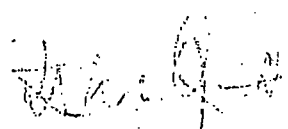

EXECUTIVE DISTRICT OFFICER
(E&SE) D.I.Khan

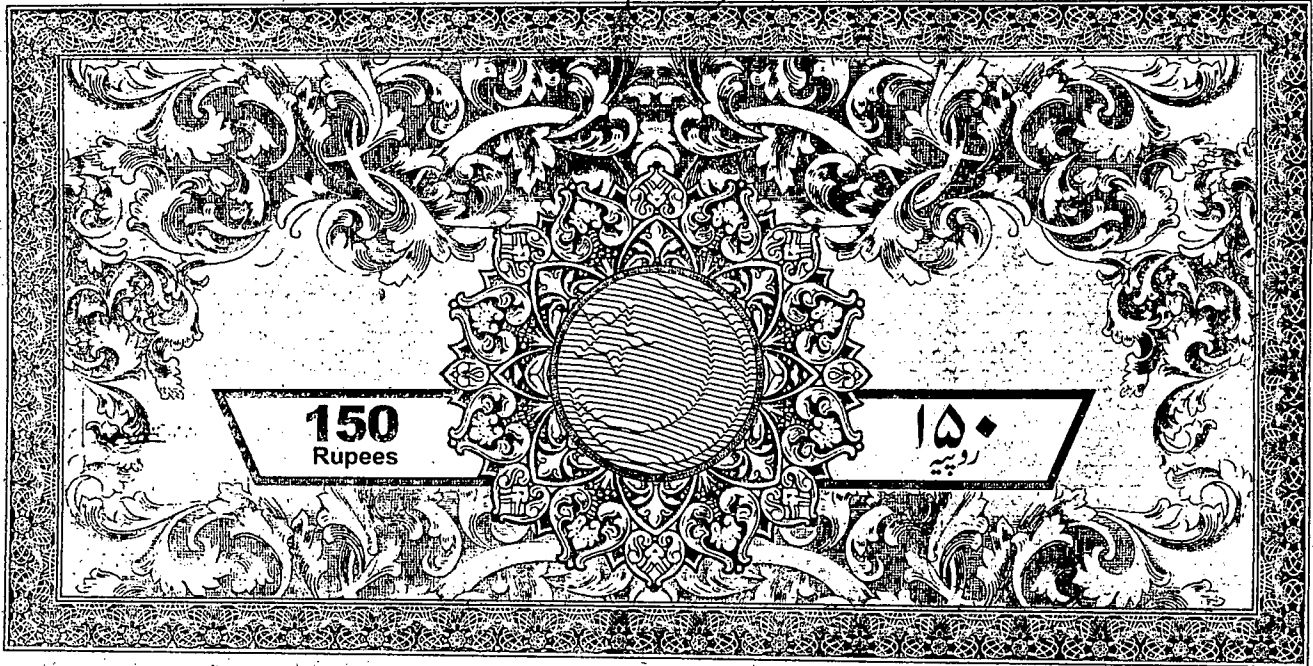
Ends No. 7520-1602

Dated D.I.Khan the 08/12/2012

Copy for information to:

1. P.S to Secretary (E&SE) KPK.
2. P.A to Director (E&SE) Peshawar.
3. District Coordination Officer D.I.Khan.
4. District Officer (E&SE) (M/F) D.I.Khan
5. ~~NA~~ concerned.


EXECUTIVE DISTRICT OFFICER
(E&SE) D.I.Khan



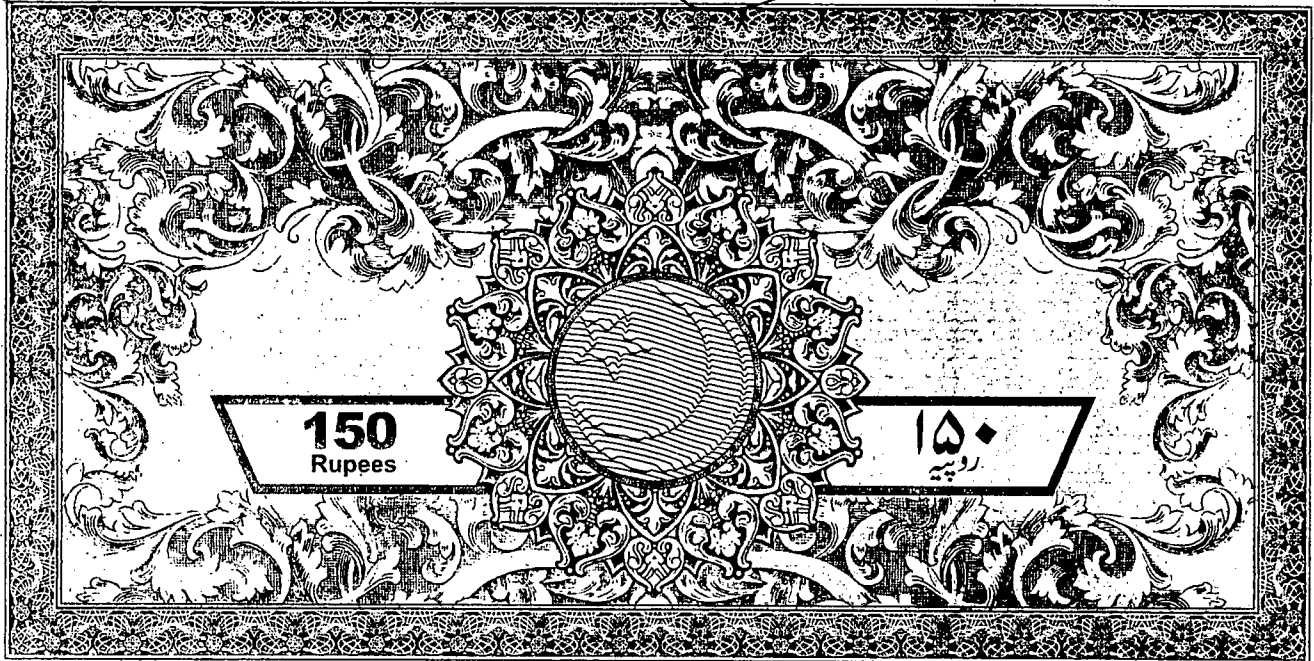
SPECIAL POWER OF ATTORNEY

I, Mst: Fozia Malik W/o Muhammad Gohar Saeed Khan R/o P/o Kot Jai Village Khanoo Khel, Tehisl Phar Pur, District D.I Khan do hereby nominate, constitute and appoint Muhammad Gohar Saeed Khan S/o Malik Muhammad Afzal Khan P/o Kot Jai Village Khanoo Khel, Tehisl Phar Pur, District D.I Khan as my Special Attorney and authorize him to appear on my behalf in case titled "**Fozia Malik, Vs Govt: of KPK**" before the Khyber Pakhtunkhwa Services Tribunal, Peshawar.

Mr. Muhammad Gohar Saeed Khan is authorized/empowered through this Special Power of Attorney to file petition, appeal, review etc upto Apex Court, to furnish affidavits, Wakalat Nama on my behalf, to sign written statement, application, compromise etc, if need be and to also engage lawyer/ counsel on my behalf.

Every action taken or ought to be taken in this respect shall be admitted to me and shall be deemed to have been performed by me.

I shall be having no objection to the acts performed by the said attorney on my behalf.



Therefore, this Special Power of Attorney is signed and executed in favour of above mentioned person in presence of witnesses on this 25th day of February, 2022.

ACCEPTED BY:

EXECUTANT

Muhammad Gohar Saeed Khan
CNIC: 12103-1475151-5

Mst: Fozia Malik
CNIC: 12103-4119537-8

WITNESS No.1

WITNESS No.2

CNIC:

CNIC:

قیمت
50 روپے

8061



ایڈوکیٹ: عبدالرحمن احمد
بار کونسل / ایسوسی ایشن نمبر: bc-10-0611
رابطہ نمبر: 03005991598

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: جسٹس مسٹر سروس ٹریڈیوٹل پشاور

دعویٰ:	منجانب: اپیلانٹ
علت نمبر:	مسماۃ فوزیہ ملک
مورخہ:	بنام
جرم:	حکومت وغیرہ
تھانہ:	

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ مقدمہ
آن مقام پشاور کیلئے عبدالرحمن احمد کی طرف سے درخواست کی گئی ہے کہ وہ اپنی کاروائی کو
کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 28/03/2022
العواہ شد
المقام: پشاور
کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

محمد گوہر سعید خان ولد ملک محمد افضل خان سکھہ صلح ڈیپارٹمنٹ پشاور
CNIC: 18103-1475151-5