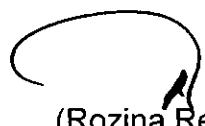


16.06.2022

Appellant present through counsel.

Noor Zaman Khan Khattak, learned District Attorney present.

Reply on behalf of respondents was not submitted. Despite directions, notices were not issued to respondents for reply. Therefore, fresh notice be issued to all the respondents for reply/comment. To come up for reply/preliminary hearing on 17.08.2022 before S.B at Camp Court, Abbottabad.


  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

19<sup>th</sup> Oct., 2022

Nemo for the appellant. Mr. Kabirullah Khattak, Addl. AG  
for the respondents present.

19<sup>th</sup> Oct., 2022

Written reply/comments on behalf of the respondents have not been submitted. Learned AAG seeks further time to contact the respondents and submit reply/comments on the next date. Granted. This case pertains to Abbottabad and because of cancellation of four the matter was fixed for preliminary hearing on 19.10.2022 at the Principal Seat. Appellant and her learned counsel did not appear. Notice be issued to appellant and her counsel for the next date. To come up for preliminary hearing on 17.11.2022 before S.B. written reply/comments and preliminary hearing on 17.11.2022 before S.B.




  
(Fareeha Paul)  
Member (E)

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 448/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/03/2022 A  12/5/22	<p>The appeal of Mst. Naheem Akhter presented today by Mr. Rashid Iqbal Khan Jadoon Attorney, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring Single Bench at abbottabad for preliminary hearing to be put up there on <u>19-5-2022</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>19.05.2022</p> <p>Learned counsel for the appellant present and heard.</p> <p>Let the respondents be submit written reply/comments. To come up for written reply/comment as well as preliminary hearing before S.B on 16.06.2022 at camp court Abbottabad.</p> <p style="text-align: right;"> (Kalim Arshad Khan) Chairman Camp Court Abbottabad</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST**

**CASE TITLE:** *Mst Naheem Akhtar v/s Edu; Department.*

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <i>Rashid khal Khan Jadoon</i>	✓	
2	Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly pagged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: *Rashid khal Khan Jadoon*  
*Attorney Abhattabal*  
 Signature: *[Handwritten Signature]*  
 Dated: *26-03-2022*

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

Service Appeal No: 448 of 2022

Mst Naheem Akhtar D/O Afsar Khan, W/O Saeed Ahmad Khan, SST,  
Government Girls Higher Secondary School Havelian, District  
Abbottabad, R/O Mohallah, Girls Degree College, In front of Urban  
Dispensary, Tehsil Havelian, District Abbottabad.

Appellant

**Versus**

Government of Khyber Pakhtunkhwa through Secretary (Elementary &  
Secondary Education), Department, Peshawar & 03 others

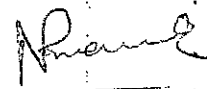
Respondents

**SERVICE APPEAL**

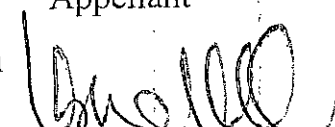
**INDEX**

S.No	DESC: OF DOCUMENTS	ANNEXURES	PAGE No
1	Memo; of Service Appeal with affidavit	---	1 to 4
2	Copy of retirement application dated 01/10/2020.	A	5
3	Copy of letter dated 26/10/2020	B	6
4	Copy of letter dated 26/11/2020	C	7
5	Copy of letter dated 09/04/2021	D	8 to 9
6	Copy of Adjustment Order dated 07/06/2021	E	10
7	Copy of Application for salary dated 29/06/2021	F	11
8	Copy of letter dated 29/07/2021	G	12
9	Copy of impugned Notification dated 16/03/2022	H	13
10	Power of attorney	I	14

Dated 26/03/2022

  
(Mst Naheem Akhtar)  
Appellant

Through

  
(Rashid Iqbal Khan Jadoon)  
Attorney Abbottabad.

①

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR.**

Service Appeal No: \_\_\_\_\_ of 2022

Mst Naheem Akhtar D/O Afsar Khan, W/O Saeed Ahmad Khan, SST,  
Government Girls Higher Secondary School Havelian, District  
Abbottabad, R/O Mohallah, Girls Degree College, In front of Urban  
Dispensary, Tehsil Havelian, District Abbottabad.

Appellant

**Versus**

- 1 Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar.
- 2 The Director, Directorate of Elementary & Secondary Education Department, Peshawar.
- 3 The District Education Officer (Female), Elementary & Secondary Education Department, Abbottabad.
- 4 Government of Khyber Pakhtunkhwa through Chief Secretary (Elementary & Secondary Education), Department, Peshawar.

Respondents

**APPEAL** UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED NOTIFICATION NO. AO/E&SE/7-1/ABBOTTABAD DATED 16/03/2022, ISSUED BY RESPONDENT NO 1, WHEREBY INSTEAD OF, ALLOWING/PERMITTING PAY/SALARY FOR INTERVENING PERIOD WITH EFFECT FROM 01/12/2020 TO 07/06/2021, TREATED IT; AS LEAVE ON FULL PAY AGAINST THE CIRCUMSTANCES OF CASE AND AGAINST THE LAW.

**PRAER:-**

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, IMPUGNED NOTIFICATION DATED 16/03/2022, ISSUED BY RESPONDENT NO 1, MAY PLEASE BE SET ASIDE AND RESPONDENTS BE DIRECTED TO ALLOW/GRANT PAY/SALARY FOR INTERVENING PERIOD WITH EFFECT FROM 01/12/2020 TO 07/06/2021 TO APPELLANT.

Respectfully Sheweth,

**FACTS**

- 1) That appellant, under the prevailing law, applied for her pre-mature retirement with effect from 30/11/2020 and submitted application on 01/10/2020, which was referred to respondent no 3, by the school principal. Copy of application is annexed as **Annexure "A"**
- 2) That after completing all legal requirements, case of retirement was sent to respondent No 02 by the respondent No 3 on 26 /10 2020, and the same was further sent to respondent no 1 on 26/11/2020. Copies of letters dated 26 /10 2020 & 26/11/2020 are annexed as **Annexure "B" & "C"**
- 3) That after passing at about 06 moths, the case of retirement of appellant alongwith others, was returned back on 09/04/2021, which was also endorsed by respondent No 2, wherein, it is shown that in pursuance of Khyber Pakhtunkhwa, Civil Servant (Amendment) Ordinance, 2021, pre- mature retirement compulsory age is now 55 years. Copy of letter dated 09/04/2021 is annexed as **Annexure "D"**
- 4) That after the above circumstances, appellant was again adjusted/posted by respondent no 3 against her previous post and school on 07/06/2021. Copy of adjustment order dated 07/06/2021 is annexed as **Annexure "E"**
- 5) That appellant submitted application dated 29/06/2021 to respondent no 3, for salary/pay of intervening period with effect from 01/12/2020 to 07/06/2021, which was referred through proper channel. Copy of application and letter of respondent no 3 dated 29/07/2021, are annexed as **Annexure "F" & "G"**
- 6) That respondent no 1, through impugned Notification dated 16/03/2022 instead of allowing/permitting pay/salary for intervening period with effect from 01/12/2020 to 07/06/2021,

treated it, as leave on full pay, is against the circumstances of case and against the law, Copy of Impugned Notification is annexed as Annexure "H" Hence this appeal is filing within statutory period of 30 days after passing final order (impugned Notification dated 16/03/2022), inters-alia on the following ground.

### Grounds

- a) That on 01/10/2020, appellant, factually and legally being eligible and entitled under the prevailing law, applied for her pre-mature retirement after completing 26 years service, with effect from 30/11/2020, and after passing of 05 months, respondent no 1, returned her pension case alongwith others cases on 09/04/2021, with the observation that now compulsory pre-mature retirement age is 55 years on the basis of Khyber Pakhtunkhwa, Civil Servant (Amendment) Ordinance, 2021, while the notification of said ordinance was issued on 26/03/2021.
- b) That similarly, respondent No 3, after receiving letter dated 09/04/2021, adjusted the appellant against her previous post, position and place of posting on 07/06/2021 and she started her services again.
- c) That after considering the above para of a & b, there are un-rebuttal facts, based on documents, these are crystal clear that there is no slight responsibility or any negligence on the part of appellant is available in the whole matter, thus impugned order/letter is against all the norms of law & justice.
- d) That it is undoubted fact that respondents illegally snatched the legal rights of the appellant in an uncivilized way in a very haste manner, which is against the equity and there is no single example is available in the civilized society.

- e) That appellant is dragged into litigation, the conduct of the respondents is admittedly arbitrary capricious unjust and against all norms of justice and as such requires indulgence of this Honourable Court by awarding appropriate Cost to the respondents.
- f) That respondents ignored the provisions of Article 4 and 25 of the Constitution of Pakistan while exercising their illegal issuance of impugned Notification dated 16/03/2022.

It is, therefore, respectfully prayed that on acceptance of instant service appeal, impugned Notification dated 16/03/2022, issued by respondent no 1, may please be set aside and respondents be directed to allow/grant pay/salary for intervening period with effect from 01/12/2020 to 07/06/2021 to appellant.

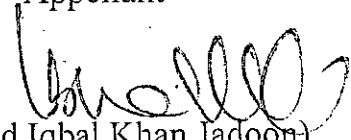
Any other relief for which the appellant is entitled, and the same is not asked/prayed specifically, may very kindly be granted in favour of the appellant.

Dated 26/03/2022



(Mst Naheem Akhtar)  
Appellant

Through



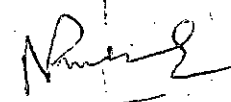
(Rashid Iqbal Khan Jadoon)  
Attorney Abbottabad.

**Affidavit**

I, Mst Naheem Akhtar D/O Afsar Khan, W/O Saeed Ahmad Khan, SST, Government Girls Higher Secondary School Havelian, District Abbottabad, R/O Mohallah, Girls Degree College, In front of Urban Dispensary, Tehsil Havelian, District Abbottabad, do here by affirm on oath that contents of instant appeal is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal and this instant appeal is first appeal & same nature of any other appeal is not pending before Honourable Tribunal

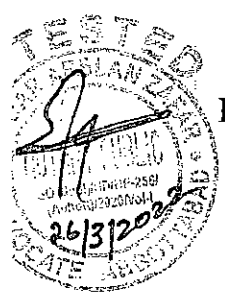
Dated 26/03/2022

CNIC No 13101-5209739-0



(Mst Naheem Akhtar)  
Appellant

DEPONENT





5

To

The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.


Through:- PROPER CHANNAL

Subject:- RETIREMENT / ENCASHMENT  
Memo:-

Most respectfully I beg to say that I am going to be retire from  
Govt; service on premature w.e.f 30.11.2020.


Therefore it is requested that I may kindly be allowed to retire from  
Govt: Service on 30.11.2020 (AN) and 353 days leave encashment in lieu of LPR.

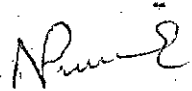
Thanks.

  
(Naheem Akhter )  
SST GGHSS: HAVELIAN.

Dated 01/12/2020

  
Principal  
Govt. Girls High School  
Scheme of Education

  
Principal  
Govt. Girls High School  
Scheme of Education

Attest  


Annexure B,

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



No. 7785 / EB-I / Retirement / SST(F)

Dated the A.Abad 26/10 /2020/

☎ 0992-342533, 0992-342314

✉ Deofemale.abbottabad@gmail.com

To

The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject:- RETIREMENT/ENCASHMENT.

Memo:-

Mst: Naheem Akhtar, SST(G) BPS-17 GGHSS Havelian Abbottabad is going to be retired on premature basis w.e.f 30.11.2020. She has submitted her application for retirement alongwith other documents / certificates (Photo copy/Original) received through Headmistress of concerned school. Which are submitted duly signed as per details given below for kind perusal and issuing of retirement order as well as sanction of (353 days) leave encashment in lieu of LPR please. Her date of birth is 10-05-1967 according to SSC Certificate.

1. Application for retirement.
2. Leave Application duly verified by the DAO Abbottabad.
3. 25 years qualifying service form duly verified by DAO Abbottabad.
4. No Demand Certificate.
5. Non-Involvement Certificate.
6. Leave not taken certificate.
7. Service Certificate.
8. Copy of CNIC.
9. Copy of SSC.
10. Copy of pay Print.
11. Bank clearance certificate.
12. NOC, PTCL / C&W/PESCO/SNGPL.
13. Affidavite.
14. 1st Appointment
15. Copy of Promotion order.
16. Photocopy of Service Book.

Endst: No. 114

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

26/10/2020

Copy for information to the:

3. Principal GGHSS Havelian Abbottabad with reference to her letter No. 114 Dated 21-10-2020.
4. B&AO Local Office.

Attested

Naheem

DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

Annexure, C,

7



**DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR**

NO. 222 / A-17/ Retirement / Abbottabad / Vol-II

Dated Peshawar the 26/11/2020

To

The Secretary to Govt. of Khyber Pakhtunkhwa  
Elementary & Secondary Education Department.

**SUBJECT:- RETIREMENT/ENCASHMENT.**

Memo:-

I am directed to refer to the subject cited above and to enclose herewith the following documents (in original) received from District Education Officer (Female) Abbottabad, vide letter No.7785 dated: 26-10-2020 in respect of Ms. Naheem Akhtar, SST (G), BPS-17, GGSS Havelian Abbottabad for further necessary action.

S.No	Document
1	DEO Letter
2	Service roll
3	Service history
4	Copy of CNIC
5	Application for retirement
6	Leave admissibility report
7	Certificates
8	Copy SSC certificate
9	Copy of pay roll
10	NOC from Bank
11	NOC from PTCL
12	NOC from PESCO
13	NOC from SNGPL
14	NDC from C&W
15	NOC from FBR
16	Appointment order
17	Promotion order
18	Service book

*H/S*  
Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Copy forwarded for information to the:-

1. District Education Officer (Female) Abbottabad w/r to her No.cited above.
2. Ms. Naheem Akhtar, SST (G), BPS-17, GGSS Havelian Abbottabad.
3. PA to Director (E&SE) local office.

*Attested*  
*Nawal*

*sd.*  
Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Annexure D,

8

Registered



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

SO (ACs)/E&SE/6-Misc/2021  
Peshawar, the April 9<sup>th</sup>, 2021

To

The Director,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: PREMATURE RETIREMENT AND ENCASHMENT OF LPR

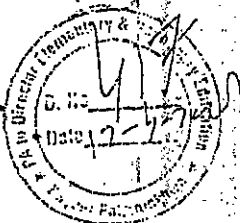
Dear Sir,

I am directed to refer to the subject noted above and to state that the premature retirement cases of the following teachers were submitted to Chief Secretary/Chief Minister Khyber Pakhtunkhwa for approval which have been returned by Establishment department with the observation that the age of the teachers are less than the 55 years as required for premature retirement under Khyber Pakhtunkhwa, Civil Servant (Amendment) Ordinance, 2021.

S.No.	Name of Teacher/Designation/BPS/School & District
1.	Mr. Hidayat Ur Rehman SST (BPS-19), GMS Sabi, District Peshawar.
2.	Mr. Fazli Akbar Khan SST (Sc.) BPS-17, GHS Kosht, District Upper Chitral
3.	Mr. Atta Ullah Khan, Superintendent BPS-17, O/o SDEO (Male), Kohat
4.	Ms. Sheeba Nahid Rani, SST (G) BPS-17, GGHS Sheikhul Bandi Abbotabad
5.	Mst. Zahida Parveen, HM BPS-17, GGHS Kundi Sherawal, Haripur
6.	Mst. Shazia Noor, Principal BPS-19, GGHS Bandi Muneem, Haripur
7.	Mst. Naheem Akhtar, SST BPS-17, GGHS Havelian, Abbotabad.
8.	Mst. Farah Saleem, HM BS-17, GGHS Bigwani Shumail D.I Khan

I am, therefore, directed to request you to ensure that the said teachers are performing their duties regularly and their salaries are released properly.

(Encl: All Original Cases)



SECTION OFFICER (ACCOUNTS)

Encl: of even No. & date:

Copy forwarded for information and necessary action to:

1. The Section Officer (Schools/Male), Elementary & Secondary Education Department.
2. The Section Officer (Schools/Female), Elementary & Secondary Education Department.
3. PS to Secretary, Elementary & Secondary Education Department.
4. PA to Additional Secretary, Elementary & Secondary Education Department.

SECTION OFFICER (ACCOUNTS)

9

OFFICE OF THE DIRECTOR ELEMETARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR

NO. 6901-6902 / A-17/Retirement/A.Abad/Vol-2

Dated Peshawar the 28/4/2021

Copy forwarded for information and n/a to the:-

1. District Education Officer (Female) Abbottabad.
2. Miss. Naheem Akhtar SST BS-17 GGHSS Havelian Abbottabad.
3. PA to Director E&SE Local office.

*[Handwritten Signature]*  
19/4/2021

Deputy Director Establishment (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

*[Handwritten Signature]*  
15/4/21

*[Handwritten Signature]*

*[Handwritten Signature]*

Annexure, E,

10

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



0992-342533, 0992-342314



Deofemale.abbottabad@gmail.com

**ADJUSTMENT:**

As approved by the competent authority the following SST(G) is hereby adjusted against vacant post of SST (G) in the public interest service with effect from the date of taking over charge.

S.No	Name	From	TO	Remarks
1	Naheem Akhter SST(G)	GGHSS Havelian	GGHSS Havelian	Vice S/No:2 In receipt back the retirement case due to less age than 55-years
2	Nazra Bano SST(G)	GGHSS Havelian	GGHS No:2 A.Abad	Against Vacant Post

**Note:**

01. Charge report should be submitted to all concerned.
02. No TA/DA is allowed.

*sd/-*  
District Education Officer  
(Female) Abbottabad

Endst: No. 5250-55 /EB-I/Adjustment SST

Dated: 7/6 /2021.

Copy for information to the:

1. District Accounts Officer Abbottabad.
2. Principal GGHSS Havelian Abbottabad is directed that the pay of teacher concerned activated from the date of charge.
3. Mst: Naheem Akhter SST (G) is directed to submit an application & leave Admisibility report from DAO Abbottabad through concerned Principal for the decession of intervening period.
4. Budget & Accounts Officer Local Office.
5. Teacher concerned.

*Attested*  
*Nazra*

*[Signature]*  
DY: District Education Officer  
(Female) Abbottabad

Annexure F,

11

To,

The District Education Officer,  
Elementary and Secondary Education,  
Abbottabad.

SUBJECT: SALARY OF INTERVENING PERIOD DUE TO RETURN OF  
RETIREMENT CASE

Respected Madam,

Respectfully, it is stated that I applied for premature retirement through a proper channel w.e.f 30-11-20 after completion of my 25 years' service. The case was returned due to underage i.e. less than 55 years age (notification copy is attached herewith). My gap period started from w.e.f 01-12-20 to ~~07-6-21~~ <sup>07 days</sup> (6 months). Your good self-reinstated me at the original station wide letter No. 5250-55 dated 7/6/2021 (copy attached).

Moreover, it is to bring into your kind notice that I am performing my duties as per the instructions from your good office. According to the notification directives by Director.E & SE department, KPK, Peshawar which mentioned that to ensure said teachers are performing their duties regularly and hence their salaries are to be released properly". In the same perspective, the DEO(M) Haripur has directed the teachers to continue their job at their original stations and the period of gap may be treated as spent on-duty (Copy attached herewith)

In the light of the above mentioned discussion, I humbly request the said authorities to consider my case and necessary arrangement may please be made for the gap period salary.

Looking forward for a kind and favorable response.

Sincerely,  
Naheem Akhtar  
SST, GGHSS, Havelian

Dated: 29-06-2021

Principal  
Govt Girls Higher Secondary  
School Havelian Abbottabad

Forwarded  
for further  
action

Forwarded  
to DEO(F) (M)  
necessary  
please.

Annexure G

12

Hand copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.



No. 6888 / EB-1/SST/Ret.

Dated the Abbottabad 29 / 7 /2021.

0992-342533, 0992-342314

Deofemale\_abbottabad@yahoo.com

To

The Director,  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject: SALARY OF THE INTERVENING PERIOD DUE TO RETURN OF RETIREMENT CASE.

Memo:-

An application alongwith other connected documents of Mst: Nacem Akhtar, SST (G) GGHSS Havelian, Abbottabad recived in this office through the Principal of this school vide No. 194 dated 29-06-2021 requesting for payment of salary of the intervening period from 01-12-2020 to ~~07-06-2021~~ <sup>27 days</sup> (06-Months) is enclosed with the request that.

01. This office submitted the retirement case of the above named teacher w.e.from 30-11-2020 (AN) vide this office letter No. 7785 dated 26-10-2020 and returned due to age less than 55-years vide your good office No. 6901-6902 dated 28-04-2021 and adjusted in the same school w.e.from 08-06-2021.

02. She was not paid salary of the above recorded period due to apply for retirement.

03. The letter of DEO (Male) Haripur referred in her application is old having date 19-10-2019.

It is therefore requested to guide this office for taking decision of the intervening period from 01-12-2020 to ~~07-06-2021~~ <sup>27 days</sup> (06-Months).

*[Signature]*  
District Education Officer  
& (Female) Abbottabad.

Endst;No. \_\_\_\_\_/

Copy for information to the :-

01:- Principal GGHSS Havelian with above reference No. & Dated..

*[Signature]*  
29/7/2021

*[Signature]*  
*[Signature]*

*[Signature]*  
District Education Officer  
(Female) Abbottabad.



13

Annexure H,



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Peshawar the March 16, 2022

**NOTIFICATION**

**NO. AO/ER/SE/7-1/Abbottabad:** The Competent Authority is pleased to regularize the Intervening period as leave on full pay w.e.f. 01-12-2020 to 07-06-2021 in respect of Mst. Naheem Akhtar, SST (General), BS-17, GGHSS Havelian, Abbottabad.

SECRETARY  
Govt. of Khyber Pakhtunkhwa  
Elementary & Secondary Edu. Department

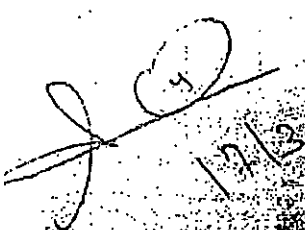
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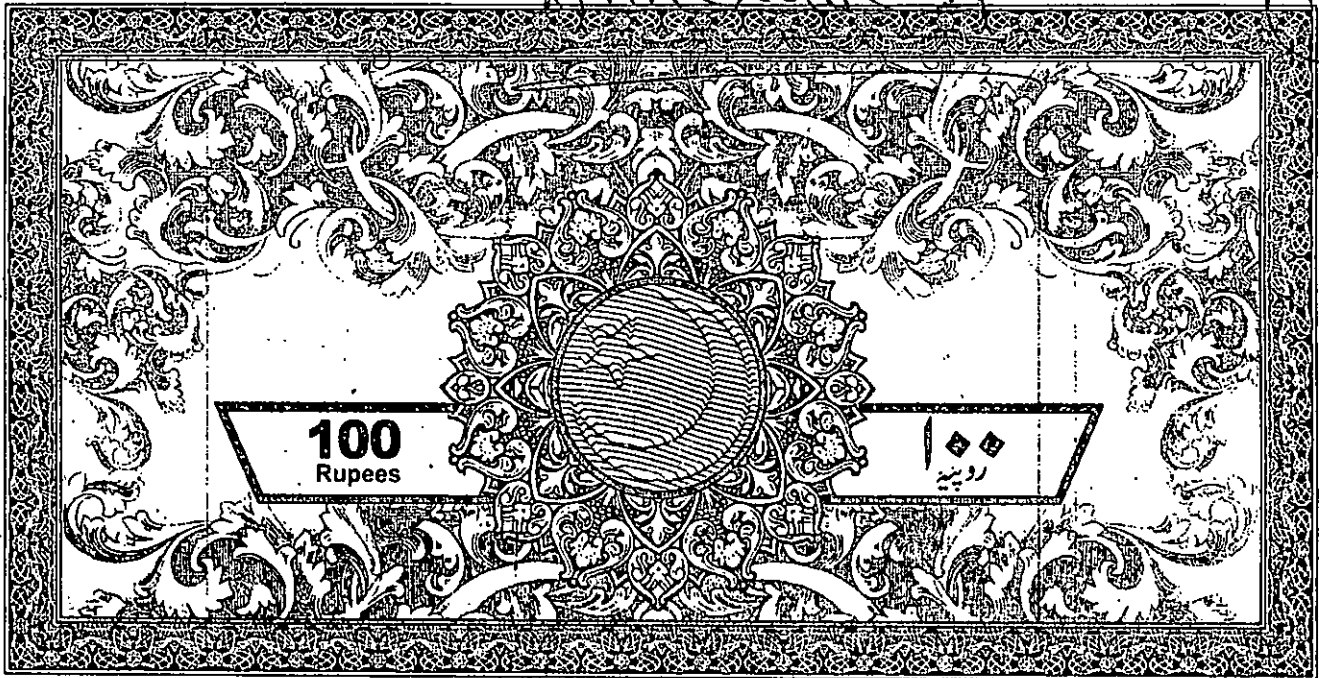
Copy forwarded to:

1. The Director, Elementary & Secondary Education, Peshawar.
2. The District Accounts Officer, Abbottabad.
3. The District Education Officer (Female), Abbottabad.
4. The Director, EMIS-Cell, E&SE Department for uploading at official website.
5. The Section Officer (Schools/Female), Elementary & Secondary Education Department.
6. Mst. Naheem Akhtar, Ex-SST (General), BS-17, GGHSS Havelian, Abbottabad.
7. Master File.

  
(ABDUL GHAFFAR)  
SECTION OFFICER (ACCOUNTS)

  
Naheem Akhtar

  
17/13



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No: \_\_\_\_\_ of 2022

Mst Naheem Akhtar D/O Afsar Khan, W/O Saeed Ahmad Khan, SST, Government Girls Higher Secondary School Havelian, District Abbottabad, R/O Mohallah, Girls Degree College, In front of Urban Dispensary, Tehsil Havelian, District Abbottabad.

Versus

Appellant

Government of Khyber Pakhtunkhwa through Secretary (Elementary & Secondary Education), Department, Peshawar & 03 others

Respondents

**SERVICE APPEAL**

**POWER OF ATTORNEY**

**NAME & OTHER PARTICULARS OF ATTORNEY**

Mr Rashid Iqbal Khan Jadoon S/o Shamarez Khan Jadoon resident of Street no 15, Mohallah Khawaja Ahmad Khaili, Jadoon Colony, Link Road Narrian Cantt; Tehsil and District Abbottabad. CNIC No 13101-0944593-9. Cell no 0333-5025002

I, Mst Naheem Akhtar D/O Afsar Khan, W/O Saeed Ahmad Khan, SST, Government Girls Higher Secondary School Havelian, District Abbottabad, R/O Mohallah, Girls Degree College, In front of Urban Dispensary, Tehsil Havelian, District Abbottabad, deponent, do hereby solemnly affirm and declare on oath that I appoint above named as attorney to act on my behalf to appear, plead for me in the titled case in which the same may be tried or heard and any other proceedings arising out of or connected herewith and he would be competent to exercise all the powers which I myself holds as petitioner, he is authorized all powers, to institute case, to submit any kind of reply, argue the case, in short, all powers or authority which I am as petitioner, would be considered to above named attorney through

Dated this 20th day of March, 2022.

CNIC No 13101-5209739-0

  
DEPONENT