

16.09.2022

Junior to counsel for appellant present.

Kabir Ullah Khattak, learned Additional Advocate General alongwith for respondents present.

Reply on behalf of respondents is still awaited. Learned AAG requested for time to submit reply/comments. Adjourned by way of last chance. To come up for reply/comments on 03.11.2022 before S.B.



(Rozina Rehman)  
Member(J)

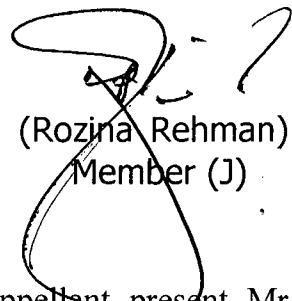
10.05.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 13.07.2022 before S.B.

Rs-500/-  
Appellant Deposited  
Security & Process Fee

Auffich  
10/5/22

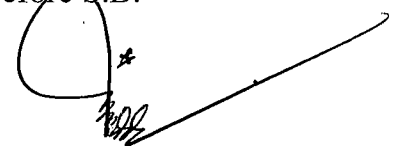


(Rozina Rehman)  
Member (J)

14.07.2022

Junior of learned counsel for the appellant present Mr. Kabirullah Khattak, Additional Advocate General for respondents present.


Reply/comments on behalf of respondents not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments on 16.09.2022 before S.B.



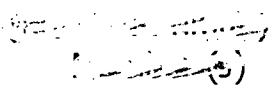
(MIAN MUHAMMAD)  
MEMBER (E)

15.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 10.05.2022 for the same as before.

  
Reader

The subject matter is pending in the court of law. The court has granted a stay order on the proceedings. The court has also granted a stay order on the proceedings. The court has also granted a stay order on the proceedings. The court has also granted a stay order on the proceedings.

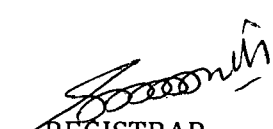

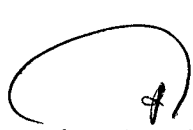


Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 7721 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/11/2021	<p>The appeal of Rozi Gul presented today by Mr. Muhammad Maaz Madni Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>20/12/21</u>.</p> <p> CHAIRMAN</p>
	20.12.2021	<p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for 15.02.2022 for preliminary hearing before S.B.</p> <p> (Rozina Rehman) Member (J)</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 7721 /2021

ROZI GUL

V/S

EDUCATION DEPTT:

**INDEX**

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4.	Regularization Order dated 25.04.2018	C	15-16
5.	Pay Slip Ms. Tahira	D	17
6.	Regularization Order dated 31.05.2021	E	18
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8.	Notifications	G	21-29
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Dated: 1<sup>st</sup> November 2021

**APPELLANT**

Through:



**MUHAMMAD MAAZMADNI,**  
ADVOCATE HIGH COURT, PESHAWAR  
KHATTAK LAW ASSOCIATES,  
Juma Khan Plaza, Warsak Road, Peshawar  
0333-9313113, 0345-9090737  
[muhammad.m3adv@gmail.com](mailto:muhammad.m3adv@gmail.com)

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

APPEAL NO. \_\_\_\_\_/2021

ROZI GUL d/o Muhammad Iqbal, PST (BPS-12),  
 Govt. Girls Primary School, Zanawar Cheena, District Momand.  
 r/o Mohallah, Sheikh Abad, Rajjar, Tehsil & District Charsadda.

.....APPELLANT

VERSUS

- 1- THE DIRECTOR OF EDUCATION,  
 Newly Merged District near Govt. High School No. 1, Fidous, Peshawar.
- 2- DISTRICT EDUCATION OFFICER,  
 Mohmand Tribal District, Mohmand.
- 3- DISTRICT ACCOUNTS OFFICER,  
 Mohmand Tribal District, Mohmand.

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER  
 PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST  
 THE INACTION OF THE RESPONDENTS BY NOT  
 ALLOWING PAY PROTECTION & NOT COUNTING THE  
 PREVIOUS SERVICE SERVED ON CONTRACT SINCE 2004  
 AND AGAINST NOT TAKING ANY ACTION ON THE  
 DEPARTMENTAL APPEAL DATED 03-07-2021 WITH IN  
 THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of the instant service appeal the inaction  
 of the respondents by not allowing Pay Protection & not  
 counting the previous service since from initial appointment  
 dated 15-03-2004 may very kindly be declared illegal and the  
 respondents may kindly be directed to allow Pay Protection  
 with all back and consequential benefits. Any other remedy  
 which this august Tribunal deems appropriate that may also  
 be awarded in favor of the appellant.

*Respectfully Sheweth;*

FACTS:

Brief facts giving raise to the instant appeal are as under:

1. That appellant is the employee of the respondent  
 Department and was initially appointed as Primary School

Teacher (PST) (BPS-07) now (BPS-12) on a project post at Female Communal School Ziarat Khazina District vide order dated 15-03-2004.

Copy of Appointment Order dated 15.03.2004 is attached as Annexure..... A.

2. That the appellant after receiving the appointment order dated 15-03-2004 submitted her arrival report and took over the charge of the post assigned in the appointment order on 15-03-2004 and since then the appellant is working quite efficiently, whole heartedly with full devotion and upto the entire satisfaction of his high ups.
3. That service book of the appellant was also prepared, necessary entries were made therein from the date of initial appointment and as such properly maintained since from the date of initial appointment i.e. 15-03-2004 till date.  
Copy of Service Book are attached as Annexure..... B.
4. That services of other communal teachers were regularized who were appointment later than the appellant vide order dated 25-04-2018 and accordingly they were allowed pay protection along with counting of their previous service for instance the pay roll of one of the regularized teacher namely Tahira is attached with the appeal.  
Copy of Regularization Order dated 25.04.2018 & Pay Slip Ms. Tahira is attached as Annexure..... C & D.
5. That like other communal teacher working under the administrative control of respondent no. 2 the service of the appellant is also regularized vide order dated 31-05-2021 against the working post the appellant is working at Govt. Girls Primary School Zanawar Cheena.  
Copy of Regularization Order dated 31.05.2021 is attached as Annexure..... E
6. That appellant has received the regularized order dated 31-05-2021 have submitted her charge report before the competent authority in the assigned duty station mentioned in the ibid regularization order.  
Copy of Charge Repot & Service Certificate is attached as Annexure..... F
7. That the appellant has served the respondent Department in BPS-07 which was later on upgraded to BPS-12 for quite considerable time since from the date of initial appointment i.e. 15-03-2004 (17 Years 02 months & 16 days) without any break in the service, hence, in light of various notification issued from time to time by the Finance Division Islamabad as

well as by Finance Department Khyber Pakhtunkhwa the appellant is entitle for pay protection & counting of previous service but the appellant is deprived of the fruition of the notifications.

Copy of Notifications are attached as Annexure..... G.

8. That as per the regularization/adjustment order dated 31-05-2021 the services of the appellant was regularized with immediate effect and not from the date of initial appointment i.e. 15-03-2004 the appellant being aggrieved from the inaction of the respondents by not allowing pay protection file Departmental Appeal dated 05-07-2021 but no response has been received after lapse of the statutory period of ninety days.

Copy of Departmental Appeal dated 07.07.2021 is attached as Annexure ...H.

9. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others:

#### GROUND:

- A- That the inaction of respondents by not allowing pay protection and not counting the previous contract service since initial appointment of the appellant rendered in the Education Department towards regular service of the in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner by allowing pay protection and not counting the previous contract service as PST (BPS-12) of the appellant rendered in the Education Department at Mohmand towards regular service in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil service Regulations.
- D- That the inaction of the respondents by not allowing pay protection and not counting the previous contract service as PST (BPS-12) of the appellant rendered in the Education Department at Mohmand towards regular service in light of Rule 2.3 of the West Pakistan Civil services Pension Rules, 1963 and in light of Article 371 A (i) of the Civil Service Regulations is discriminatory



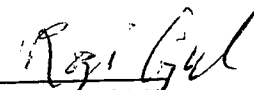
and against the norms of Natural Justice, therefore the same is not tenable in the eye of law.

- E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for counting of his previous contract service as PST (BPS-12) of the appellant rendered in the Education Department at Mohmand.
- F- That there is no break in service of appellant from the date of initial appointment i.e. 15-03-2004 till his regularization on the post of PST-12 vide order dated 31-05-2021 and as such the appellant is entitle for pay protection and counting the previous contract service since initial appointment of the appellant rendered in the Education Department towards regular service.
- G- That in light of Rule-2.3 of the West Pakistan Pension Rules, 1963 the appellant is fully entitle for the counting of his previous service served as PST (BPS-12) in the Education Department of District Mohmand.
- H- That the act of the respondents by not allowing pay protection and not counting the previous contract service since initial appointment of the appellant rendered in the Education Department towards regular service for a period of 17 Years 02 months & 16 days is also against the notification issued by Finance Division Islamabad and also of the notification issued by Finance Department Khyber Pakhtunkhwa.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 01-11-2021

Appellant

  
ROZI GUL

Through

  
MUHAMMAD MAAZ MADNI  
Advocate, High Court, Peshawar

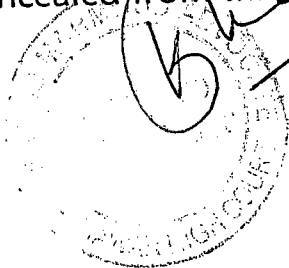
CERTIFICATE

No, such like appeal has been filed or pending on the subject matter between the parties before this Honourable Tribunal.

  
ADVOCATE

AFFIDAVIT

I, Miss Rozi Gul d/o Muhammad Iqbal, do hereby solemnly affirm on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



1-11-21

  
DEPONENT  
17101-2851132-6

NOTE:

Addresses of parties mentioned in the heading of the appeal is correct and sufficient for service.

  
ADVOCATE

LIST OF BOOKS:

1. Constitution of Pakistan, 1973.
2. Service Laws
3. Other relevant case Laws



6

# ANNEXURE - A

DIRECTORATE OF EDUCATION  
(FATA) N.W.F.P. PESHAWAR

## APPOINTMENT ORDER

Consequent upon the recommendation of the Village Education Committee duly endorsed by Agency Education Officer for proper Agreement form Miss Rozi Gul D/O Muhammad Iqbal B/O Mohmand Agency having qualification of F.A. is hereby appointed against the project posts of P.T.C. in B.P.S. for the project period at Female Communal School Ziarat Khazina Mohmand Agency with effect from taking over charge.

Note:-

1. The employee shall serve the Govt. as Communal Schools teacher from the date of assumption.
2. She shall devote her whole time to her duties as Communal School Teacher.
3. She shall carry out such administrative and teaching functions in relation to her duties.
4. She shall submit herself to the lawful order so the Govt. Officers as well as V.E.C.
5. She shall motivate the parents to send their children to school.
6. She shall keep in contact with the V.E.C. to inform them of schools progress issues & problems.
7. These posting will not be transferable however local teachers preferably trained can be adjusted against regular posts on case to case basis.
8. They should produce their health & age certificate to the Agency Education Officer.

(Prof. Dr. Abdur Rauf)  
Directorate of Education  
FATA N.W.F.P. Peshawar

Dated Pesh. the 15/3/04

EndstNo 9177-83/H-2/FCS/Apptt.

Copy forwarded to:-

1. The Additional Secretary P&D Department Govt. of NWFP, Peshawar.
2. The Agency Education Officer Mohmand Agency with the remarks:  
D) To check all her credentials with the same concerned Institutions, Boards & Universities and not to hand over charge if there is any discrepancy. Her orders are approved subject to verification of documents.  
H) Teachers from Communal Schools should not be transferred to permanent posts.  
III) All prevailing services rules with the exception of permanent appointment are equally applicable on these teachers.
3. The Agency Accounts Officer Mohmand Agency.
4. The S.A.P. (Coordinator) FATA P&D Department Governors Secretariat.
5. The Chairperson Village Education Committee concerned.
6. The Candidate concerned.

Assistant Director (P&D)  
For/Director of Education  
FATA N.W.F.P. Peshawar

to be true  
Advoc

15/3/04

# SERVICE BOOK

7

145

ANNEXURE-B

P. No. 00355185

00355185

OF

Mrs. Rozi Gul W/o  
S/o Mohammad Raza  
Designation PTC  
Department Education ECS Junior High

Price : ~~1000~~/-

10/10/10  
ADVA

PRINTED BY:  
STATIONERY & PRINTING DEPARTMENT, GOVERNMENT OF KHYBER PAKHTUNKHWA,  
PESHAWAR

8

(For use in Police Department only)

Heirs:

- 1. Passed SSC from BISE Peshawar
- 2. in Session 8/1994, mark Roll No 0769
- 3. Marks obtained 390/850

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

*[Signature]*  
 A.E.O.  
 Command Agent

Left Thumb Impression

Passed KA from BISE Peshawar in Session

Qualification U.S.S. Date 11/07/11 Qualification Marks obtained Date \_\_\_\_\_

English First Arts

Pushto A.E.O. Command Agent Or B.A.

Urdu Pleadership examination

Plan-drawing Training School Final examination

Finger Print Other qualification:—

Drill Instructing

Court Duties

Reserve Duties

*[Signature]*  
 to be filled by  
 Advocate

N.B. Line to be drawn under the qualification possessed.

9

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

1. Name: Miss Rozi Gul.

2. Race: Afghan

3. Residence: Vill: Rajar Shukurabad Distt Charssadda  
P.O. Rajar

4. Father's name and residence: Mohammad Gopal As above.

5. Date of birth by Christian era as nearly as can be ascertained: 2-3-1975 (2nd March M.H.D Seventy five)

6. Exact height by measurement: 6-3

7. Personal marks for identification:

8. Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger	Ring Finger
Middle Finger	Fore Finger
Thumb	

Signature of Government Servant: Rozi Gul

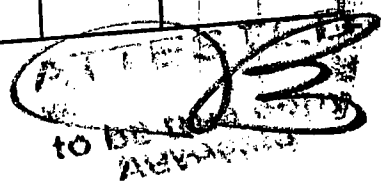
Signature and designation of the Head of the Office, or other Attesting Officer.

A.E.O. Military Agency

ATTESTED  
to be true  
Advocate

10

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 "a"	Date of appointment	Signature of Government Servant
DTC		BPS 7A 2220-120-5820					
CS Junior Clerk Alom		P, 2220/m				15/3/2004	Rozid
dw -		P, 2340/m				12/2004	Rozid
		BPS 7A 2555-140-6755					
dw -		P, 2695/m				12/2005	Rozid
dw -		P, 2835/m				12/2005	Rozid
dw -		P, 2975/m				12/2006	Rozid
		BPS 7A 2940-160-7740					
dw -		P, 3420/m				12/2007	Rozid
dw -		P, 3580/m				12/2007	Rozid


  
 to be used  
 Adv.

9	10	11	12	13		14	15
				Nature and duration of leave taken.	Leave		
					Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and Designation of the head of the office or other attesting officer in attestation of 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.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
Mohmand Agency <i>[Signature]</i>	30/11/08	Dismiss of P.D.	<i>[Signature]</i>			<i>[Signature]</i>	
Mohmand Agency <i>[Signature]</i>	30/11/08	A/m	<i>[Signature]</i>			<i>[Signature]</i>	we 1-15 2004 to 30/11/08 from the record of this office
Mohmand Agency <i>[Signature]</i>	30/11/09	A/m	<i>[Signature]</i>			<i>[Signature]</i>	
Mohmand Agency <i>[Signature]</i>	30/11/10	A/m	<i>[Signature]</i>			<i>[Signature]</i>	
Mohmand Agency <i>[Signature]</i>	30/11/11	Dismiss of P.D.	<i>[Signature]</i>				
Mohmand Agency <i>[Signature]</i>	30/11/11	A/m	<i>[Signature]</i>				
Mohmand Agency <i>[Signature]</i>	30/11/12	A/m	<i>[Signature]</i>				
Mohmand Agency <i>[Signature]</i>	30/11/2013	A/m	<i>[Signature]</i>				
Mohmand Agency <i>[Signature]</i>	30/11/2014	A/m	<i>[Signature]</i>			<i>[Signature]</i>	

to be used  
[Signature]



11

9	10	11	12	13		14	15					
				Signature and Designation of the head of the office or other attesting officer (in attestation of 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.	Leave	
											Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government	Reference to any recorded punishment or censure or praise of the Government Servant.
Period	Government to which debitible											
A.E.O. Mohmand Agency	30/11/2004				Appointed against P.T. Post- at RCS Juma Khan vide order no 9177 P3 dt-15/3-2004							
A.E.O. Mohmand Agency	6/2/2005	Leave			in Mohmand Agency							
A.E.O. Mohmand Agency	30/11/2008											
A.E.O. Mohmand Agency	30/11/2008											
A.E.O. Mohmand Agency	30/11/2007	Leave										
A.E.O. Mohmand Agency	30/11/2007											
A.E.O. Mohmand Agency	30/11/2007											
A.E.O. Mohmand Agency	30/11/2007											

to be [Signature]

12

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 "sp"	Date of appointment	Signature of Government Servant.
PTE	BPS 7A		3530-190-	9236			
CS Juni Man	R		4290/m			7/2008	R. S. Kaul
do	R		4480/m			12/2008	R. S. Kaul
do	R		4670/m			12/2008	R. S. Kaul
do	R		4860/m			12/2009	R. S. Kaul
do	R		5800-320-	15400			
do	R		8060/m			7/2011	R. S. Kaul
do	R		8360/m			12/2011	R. S. Kaul
do	R		8680/m			12/2012	R. S. Kaul
do			RS 9000			12/2013	
do						12	

to be [Signature]



18	Farah Naz	Muhammad Ali Khan	FCS Navi Dhand	GGPS Sarra Khawa	-do-
19	Rashida Bibi	Nazir Muhammad	FCS Wali Jan	GGPS Karrir Musaf	-do-
20	Asmat Ara		FCS Navi Dhand	GGPS Karrir Musaf	-do-

**TERMS/CONDITIONS**

1. Regularization of the teachers has been made purely on temporary basis and is liable to termination at any time without assigning any reason.
2. All academic, professional and domicile documents/certificates of the teachers should be verified from the concerned institutions through AEO office before drawl of their salaries.
3. Charge reports should be submitted in duplicate.
4. If they failed to report their arrival within 15 days, their regularization orders will be automatically considered as cancelled.
5. If any legal and technical error/omission pointed out, the regularization orders will stand cancelled.
6. Those teachers who have not passed FA, FSc/PTC or equivalent are directed to pass within two years.

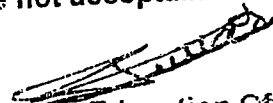
(FARID ULLAH)  
 Agency Education Officer,  
 Mohmand Agency

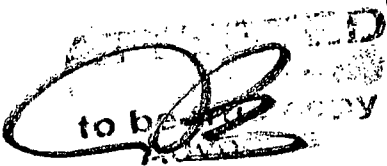
Endst.No. 2646-55/Estab:II/Regularization:/PST(F) dated Ghallanai 25/04/2018.

Copy to:-

1. Director Education FATA Secretariat Peshawar.
2. Political Agent Mohmand Agency.
3. PS to secretary SSD FATA Secretariat.
4. Agency Accounts Officer Mohmand Agency.
5. Agency Surgeon Mohmand Agency
6. AAEO (Dev) local office.
7. AAEO Female local office.
8. Accountant local office.
9. Teachers concerned.

Note: Unattested photocopies of relevant documents are not acceptable.

  
 Agency Education Officer,  
 Mohmand Agency

  
 to be copy

ds/R

17

# ANNEXURE D

**Dist. Govt. KP-Provincial**  
**District Accounts Office GHALANAI**  
**Monthly Salary Statement (January-2021)**

**Personal Information of Mrs TAHIRA d/w/s of FAZLI RASID**

Personnel Number: 00391934      CNIC: 1540106812266  
Date of Birth: 03.04.1976      Entry into Govt. Service: 29.04.2007

NIN:  
Length of Service: 13 Years 10 Months 04 Days

**Employment Category: Active Temporary**

Designation: PRIMARY SCHOOL TEACHER

80926290-DISTRICT GOVERNMENT KHYBE

DDO Code: MG6013-DEO Primary Education Mohmand

Payroll Section: 001

GPF Section: 001

Cash Center: 71

GPF A/C No:

Interest Applied: Yes

GPF Balance:

64,919.00

Vendor Number: -

Pay scale: BPS For - 2017

Pay Scale Type: Civil    BPS: 12

Pay Stage: 3

**Pay and Allowances:**

	Wage type	Amount		Wage type	Amount
0601	Basic Pay	16,200.00	1000	House Rent Allowance	1,961.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,700.00	2148	15% Adhoc Relief All-2013	350.00
2199	Adhoc Relief Allow @10%	226.00	2211	Adhoc Relief All 2016 10%	1,114.00
2224	Adhoc Relief All 2017 10%	1,620.00	2247	Adhoc Relief All 2018 10%	1,620.00
2264	Adhoc Relief All 2019 10%	1,620.00			0.00

**Deductions - General**

	Wage type	Amount		Wage type	Amount
3012	GPF Subscription	-2,220.00	3501	Benevolent Fund	-500.00
3990	Emp. Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-600.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**  
Payable: 0.00      Recovered till JAN-2021: 0.00      Exempted: 0.00      Recoverable: 0.00

**Gross Pay (Rs.): 30,767.00      Deductions: (Rs.): -3,545.00      Net Pay: (Rs.): 27,222.00**

Payee Name: TAHIRA

Account Number: 7900085803

Bank Details: HABIB BANK LIMITED, 220326 HARICHAND, CHARSADDA, HARICHAND, CHARSADDA, CHARSADDA

Leaves:      Opening Balance:      Availed:      Earned:      Balance:

Permanent Address:

City: X

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

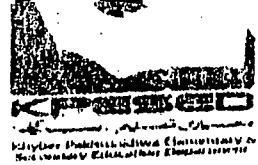
Email: tahirabegum347@gmail.com

to be true  
Adm



18

MOHMAND TRIBAL DISTRICT  
Ph. No. : 0924-290180  
FAX : 0924-290180  
Email :- deomohmand@gmail.com



ANNE-E

**REGULARIZATION/ADJUSTMENT ORDER OF FEMALE COMMUNITY TEACHER.**

In compliance with: decision made by worthy Director Education Ex-FATA bearing Endst. No.2532 dated 26.02.2018 and notification No.SOE/SSD/CSCR/99-108 dated 11/5/2011, the following female community school teacher (Include in 2019-20 PC-1 ) and still working in the functional community school is hereby regularized against regular vacant PST post at the school noted against her name in BPS-12@(13320-960-42120) plus usual allowances ass admissible under the rules with immediate effect in the interest of public services.

S.No	Name & Father Name	Name of Community School	Place of posting where regularized	Remarks
1	Rozi Gul S/O Muhammad Iqbal	FCS Zanawar Cheena	GGPS Zanawar Cheena	A.V.P

**TERMS & CONDITIONS**

- The appointment of the candidate is being made purely on temporary basis and is liable to termination at any time without assigning any reason.
- No TA/DA e.t.c is allowed.
- Charge report should be submitted to all concerned in duplicate.
- Appointment is purely on temporary basis, initially for one year.
- Appointment is subject to the condition that their certificate/degrees must be verified from the concerned authorities if any documents found bogus/fake/forged, they will be terminated and their case will be reported to law enforcing Department/agencies for further action.
- Her service is liable to termination on one month's notice from either side. In case of resignation without notice her one month pay/allowances shall be forfeited to the Government.
- Pay will be issued by this office after verification of all documents by ADEO concerned.
- They should join her post within 30 days of the issuance of this appointment order, failing which her appointment will expire atomically and no subsequent appeal etc. shall be entertained.
- Health and age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- They will be governed by such rules and regulation as may be issued from time to time by the Government.
- Before handing over charge she will sign an agreement with the department, otherwise this order will not be valid.
- Her service shall be terminated at any time, in case her performance is found unsatisfactory during contract period. In case of misconduct, she will be proceeded under the rules framed from time to time.
- Before handing over charge her documents may be checked and if they have not required qualification, they may not be handed over charge.

Note: - Head Master/ADEO concerned is directed to verify this order from the office of the DEO Mohmand before handing over charge to the official.

(Noor Hassan Khan)  
District Education Officer  
Mohmand Tribal District

Endst.No. 3339-46

dated. 31/5/2021

Copy to the:-

- Director of Education Elementary & Secondary Khyber Pakhtunkhwa Peshawar.
- Director of Education NMD Secretariat Peshawar.
- Deputy Commissioner Mohmand Tribal District.
- District Account Officer Mohmand Tribal District.
- ADEO Female concerned.
- Teachers Concerned.
- EMIS Section Local Office.
- Office record.

to be true  
Advocate

CHARGE REPORT

19

ANNEXURE-F

I Rozi Gul in compliance with the  
D.E.O Mphmand Tribal District

Endst: No. 3339-46 Dated: 31.05.2021

Took over charge as PST in FCS  
Zanawar cheena on forenoon.

Principal/Headmistress

Dated: 31.05.2021.

Rozi Gul

P.S.T. Rozi Gul

Dated: 31.05.2021.

ATTACHED  
to be filed by

20

**SERVICE CERTIFICATE.**

Certified that Mst; Rozi Gul PST D/O Mohammad Iqbal GGPS Zanwar Chena Mohmand has been serving in Education Department since 13-05-2021 At present, she is working against PST post Mohmand Tribal her personal No 355185.

*Kalbar*

Assistant District Education Officer,  
Mohmand at Ghallanai.

**District Education Officer  
Mohmand Tribal District**

**G.G.P.S  
Zanwar Chena**

*[Signature]*



Government of Pakistan  
Finance Division  
(Regulations Wing)

\*\*\*\*

Islamabad, the 31<sup>st</sup> May, 2013

F. No. 7(9)R-1/2012-

OFFICE MEMORANDUM

Amexure - G

Subject: PROTECTION OF PAY OF CONTRACT EMPLOYEES ON  
REGULARIZATION/APPOINTMENT ON REGULAR BASIS

The undersigned is directed to say that the proposals for protection of pay last drawn by the contract employees on their regularization/appointment on regular basis are received in Finance division and considered/decided on case to case basis. The existing rules/orders on the subject do not provide for protection of pay of contract employees on their regularization. The Courts have held from time to time that the pay of contract employees on their regularization/appointment on regular basis should be protected. The matter has been examined in the light of Court's Judgments and it has been decided to issue general policy guidelines in this regard. Pay of a non-Gazetted contract employee on his regularization/appointment on regular basis will be protected subject to the following conditions:-

- i) That the contract appointment has been made on standard terms and conditions circulated by Establishment Division as amended for time to time.
- ii) That the contract employee has applied through proper channel and has been properly relieved by the appointing authority. This condition shall not apply in case of regularization on the same post.
- iii) That regularization/regular appointment has been made with the approval of competent authority.
- iv) That there is no break/interruption between contract service and regular service.
- v) That the service rendered on contract basis shall not qualify for pension/gratuity.
- vi) That in case of regular appointment in lower grade pay shall not be protected.

2. Ministries/Divisions/Departments are authorized to protect/fix pay in terms of above guidelines. Only those cases may be referred to Finance Division where some clarification or advice of Finance Division is required.

(Muhammad Bashir Zahid)  
Accounts Officer(R-1)  
Tele: 9245843

All Ministries/Divisions/Departments

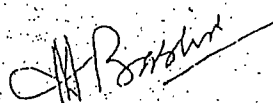
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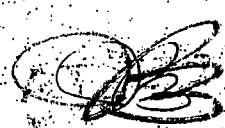
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5. National Assembly Secretariat, Islamabad.
6. Senate Secretariat, Islamabad.
7. Election Commission of Pakistan, Islamabad.
8. Supreme Court of Pakistan, Islamabad.
9. Federal Shariat Court, Islamabad.
10. Auditor General of Pakistan, Islamabad.
11. Controller General of Accounts, Islamabad.
12. AGPR, Islamabad/Lahore/Peshawar/Karachi/Quetta.
13. Military Accountant General, Rawalpindi.
14. All Financial Advisers/Deputy Financial Advisers attached to Ministries/Divisions and all officers of Finance Division.
15. Chief Accounts Officer, M/o Foreign Affairs, Islamabad.
16. Financial Adviser and Chief Accounts Officer, Pakistan Railways, Lahore.
17. All Chief Secretaries/Finance Secretaries of the Government of Punjab/Sindh/KPK/Balochistan & Azad State of Jammu & Kashmir.
18. Capital Development Authority, Islamabad.
19. Office of the Chief Commissioner, Islamabad.
20. Federal Public Service Commission, F-5/1, Agha Khan Road, Islamabad.
21. Secretary, Wafaqi Mohtasib (Ombudsman)'s Secretariat, Islamabad.
22. Pakistan Atomic Energy Commission, Islamabad.
23. Central Directorate of National Savings, Islamabad.
24. National Accountability Bureau, Islamabad.
25. Member (Finance), KRL, P.O. Box No.1384, Islamabad.
26. Intelligence Bureau, Islamabad.
27. Pakistan Mint, Lahore.
28. DG Post Offices, Islamabad.
29. Secretariat Training Institute, Islamabad.
30. Directorate General of Inspection & Training, Customs & Central Excise, 8<sup>th</sup> Floor, New Customs House, Karachi.
31. National Re-Construction Bureau, Prime Minister's Secretariat, Islamabad.
32. Earthquake Reconstruction & Rehabilitation Authority (ERRA), P.M. Sectt. (Public), Islamabad.
33. Federal Tax Ombudsman's Secretariat, Islamabad.
34. Cost Accounts Organization, Islamabad.

  
(Muhammad Bashir Zahid)  
(Section Officer(R-II))  
Tele: 9245843

  
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Auto.

Government of Pakistan  
Finance Division  
(Regulations Wing)

Islamabad, the 6th March, 2014

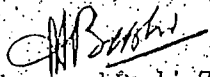
F.No. 7(9) R-I/2012-1388

OFFICE MEMORANDUM

Subject: CLARIFICATION REGARDING PROTECTION OF PAY OF CONTRACT EMPLOYEES ON REGULARIZATION APPOINTMENT ON REGULAR BASIS

The undersigned is directed to refer to this Division's O.M. of even number dated 31<sup>st</sup> May, 2013 and state that AGPR, Islamabad and certain Ministries/Divisions/Departments have raised certain queries for clarification which have been examined and clarified as under:-

S. No	Queries raised	Clarification
i.	Finance Division's O.M. dated 31 <sup>st</sup> May, 2013 does not contain effective date of implementation. From which date will it take effect.	The said O.M. will take effect from the date of its issue i.e. 31-05-2013.
ii.	Whether the pay of employees working on daily wages, short-term vacancies and on contract basis, regularized by the Cabinet Sub-Committee is protectable.	The pay of only those contract employees (Non-gazetted), whose appointments have been made on standard terms and conditions in BPS by the competent authority, is protectable.
iii.	Whether employees whose services were transferred from development to non-development side are entitled to pay protection.	Pay is protectable of those employees only whose contract appointment in development side was made in BPS-1 to 16 on standard terms and conditions.
iv.	Whether the pay of contract employees on their regularization in lower grade is protectable or otherwise.	Finance Division's O.M. clearly states that in case of regular appointment in lower grade pay shall not be protected.
v.	Whether the contract employees of BPS-1 to 4 who were moved one scale up w.e.f. 01-07-2007, are entitled to protection of pay on regularization.	Yes.
vi.	In case the pay protection is allowed w.e.f. 31-05-2013 to all back date cases, please clarify about the date of pay fixation regarding date of regularization or implementation of this policy and whether payment of arrear after 31-05-2013 payable or not.	As stated against (i) above.
vii.	Whether an employee working in a Development Project on his appointment on regular basis in the Ministry, Division and Department is protectable.	As stated against (iii) above.
viii.	Whether the pay of an employee working on contract basis in the Provincial Government who later on joins a regular post in a Federal Government is also protectable.	Yes, subject to conditions, as stated against (ii) above.

  
(Muhammad Bashir Zahid)  
Accounts Officer (R-I)

All Ministries/Divisions/Departments

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Advocate

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6. Senate Secretariat, Islamabad.
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8. Supreme Court of Pakistan, Islamabad.
9. Federal Shariat Court, Islamabad.
10. Auditor General of Pakistan, Islamabad.
11. Controller General of Accounts, Islamabad.
12. AGPR, Islamabad/Lahore/Peshawar/Karachi/Quetta.
13. Military Accountant General, Rawalpindi.
14. All Financial Advisers/Deputy Financial Advisors attached to Ministries/Divisions and all officers of Finance Division.
15. Chief Accounts Officer, M/o Foreign Affairs, Islamabad.
16. Financial Adviser and Chief Accounts Officer, Pakistan Railways, Lahore.
17. All Chief Secretaries/Finance Secretaries of the Government of Punjab/Sindh/KPK/Balochistan & Azad State of Jammu & Kashmir.
18. Capital Development Authority, Islamabad.
19. Office of the Chief Commissioner, Islamabad.
20. Federal Public Service Commission, F-5/1, Agha Khan Road, Islamabad.
21. Secretary, Wafaqi Mohtasib (Ombudsman)'s Secretariat, Islamabad.
22. Pakistan Atomic Energy Commission, Islamabad.
23. Central Directorate of National Savings, Islamabad.
24. National Accountability Bureau, Islamabad.
25. Member (Finance), KRL, P.O.Box No.1384, Islamabad.
26. Intelligence Bureau, Islamabad.
27. Pakistan Mint, Lahore.
28. DG Post Offices, Islamabad.
29. Secretariat Training Institute, Islamabad.
30. Directorate General of Inspection & Training, Customs & Central Excise, 8<sup>th</sup> Floor, New Customs House, Karachi.
31. National Re-Construction Bureau, Prime Minister's Secretariat, Islamabad.
32. Earthquake Reconstruction & Rehabilitation Authority (ERRA), P.M. Sectt. (Public), Islamabad.
33. Federal Tax Ombudsman's Secretariat, Islamabad.
34. Cost Accounts Organization, Islamabad.

*(Signature)*  
 (Muhammad Bashir Zahid)  
 (Section Officer(R-II))  
 Tele: 9245843

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Advocate

*(Signature)*  
 to be true copy  
 Advocate



GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT  
(REGULATION WING)

(26) 16  
25

NO. FD (SOSR-1) 12-7/2014  
Dated Peshawar the 6<sup>th</sup> February, 2014

To:

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
3. The Secretary to Governor, Khyber Pakhtunkhwa.
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary Finance FATA, FATA Secretariat, Peshawar.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Divisional Commissioners in Khyber Pakhtunkhwa.
9. All Political Agents / District & Sessions Judges in Khyber Pakhtunkhwa.
10. The Registrar, Peshawar High Court, Peshawar.
11. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
12. The Chairman, Services Tribunal, Khyber Pakhtunkhwa.
13. The Accountant General, Khyber Pakhtunkhwa, Peshawar.

Subject: PROTECTION OF PAY OF CONTRACT EMPLOYEES ON  
REGULARIZATION / APPOINTMENT ON REGULAR BASIS.

Dear Sir,

In pursuance to the Finance Division's Office Memorandum No.7(9)R-1/2012 dated 31<sup>st</sup> May, 2013, the competent authority is pleased to allow the pay protection to non-Gazetted contract employees on their regularization / appointment on regular basis with immediate effect subject to the following conditions:-

- i) That the contract appointment has been made on standard terms and conditions circulated by this Provincial Government as amended from time to time.
- ii) That the contract employee has applied through proper channel and has been properly relieved by the appointing authority. This condition shall not apply in case of regularization on the same post.
- iii) That regularization / regular appointment has been made with the approval of competent authority.
- iv) That there is no break / interruption between contract service and regular service.
- v) That the service rendered on contract basis shall not qualify for pension / gratuity.
- vi) That in case of regular appointment in lower grade, pay shall not be protected.

*[Handwritten signature]*

Yours faithfully,

*[Handwritten signature]*  
(RAZAULLAH KHAN)

Addl. Secretary (Regulation)

ATTESTED

*[Handwritten signature]*

ATTESTED

P.T.O

to be made copy  
Attorney

*[Large handwritten signature]*

Islamabad, the 7<sup>th</sup> April, 2015.

F. No. 4 (2) R-2/2014-237

OFFICE MEMORANDUM

Subject:- PROTECTION OF PAY OF GAZETTED CONTACT EMPLOYEES ON REGULARIZATION/APPOINTMENT ON REGULAR BASIS.

The proposal for protection of pay last drawn by the contract employees on their regularization/appointment on regular basis are received in Finance Division and considered/decided on case to case basis. The existing rules/orders on the subject do not provide for protection of pay of gazetted contract employees on their regularization. The Courts have held from time to time that the pay of gazetted contract employees on their regularization/appointment on regular basis should be protected. The matter has been examined in the light of Court's Judgments and it has been decided to issue general policy guidelines in this regard. Pay of gazetted contract employee on his regularization/appointment on regular basis will be protected subject to the following conditions:-

- i. That the contract appointment has been made in a BPS on standard terms and conditions circulated by Establishment Division as amended for time to time.
- ii. That the contract employee has applied through proper channel and has been properly relieved by the appointing authority. This condition shall not apply in case of regularization on the same post.
- iii. That regularization/regular appointment has been made with the approval of competent authority.
- iv. That there is no break/interruption between contract service and regular service.
- v. That the service rendered on contract basis shall not qualify for pension/gratuity.
- vi. That in case of regular appointment from higher grade to lower grade, pay shall not be protected.

2. Accountant General of Pakistan Revenues (AGPR) will make fixation of pay in terms of above guidelines. Only those cases may be referred to Finance Division where some clarification or advice of this Division is required.

(Nadeem Ijaz Ahmad)  
Section Officer (R-2)  
Ph. 9245846

All Ministries/Divisions/Departments


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Advocate

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Advocate

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6. Senate Secretariat, Islamabad.
7. Election Commission of Pakistan, Islamabad.
8. Supreme Court of Pakistan, Islamabad.
9. Federal Shariat Court, Islamabad.
10. Auditor General of Pakistan, Islamabad.
11. Controller General of Accounts, Islamabad.
12. AGPR, Islamabad/Lahore/Peshawar/Karachi/Quetta.
13. Military Accountant General, Rawalpindi.
14. All Financial Advisers/Deputy Financial Advisors attached to Ministries/Divisions and all officers of Finance Division.
15. Chief Accounts Officer, M/o Foreign Affairs, Islamabad.
16. Financial Adviser and Chief Accounts Officer, Pakistan Railways, Lahore.
17. All Chief Secretaries/Finance Secretaries of the Government of Punjab/Sindh/KPK/Balochistan & Azad State of Jammu & Kashmir & Gilgit-Baltistan.
18. Capital Development Authority, Islamabad.
19. Office of the Chief Commissioner, Islamabad.
20. Federal Public Service Commission, F-5/1, Agha Khan Road, Islamabad.
21. Secretary, Wafaqi Mohtasib (Ombudsman)'s Secretariat, Islamabad.
22. Pakistan Atomic Energy Commission, Islamabad.
23. Central Directorate of National Savings, Islamabad.
24. National Accountability Bureau, Islamabad.
25. Member (Finance), KRL, P.O. Box No. 1384, Islamabad.
26. Intelligence Bureau, Islamabad.
27. Pakistan Mint, Lahore.
28. DG Post Offices, Islamabad.
29. Secretariat Training Institute, Islamabad.
30. Directorate General of Inspection & Training, Customs & Central Excise, 8<sup>th</sup> Floor, New Customs House, Karachi.
31. National Re-Construction Bureau, Prime Minister's Secretariat, Islamabad.
32. Earthquake Reconstruction & Rehabilitation Authority (ERRA), P.M. Sectt. (Public), Islamabad.
33. Federal Tax Ombudsman's Secretariat, Islamabad.
34. Cost Accounts Organization, Islamabad.
35. Web Master

  
(Nadeem Ijaz Ahmad)  
Section Officer (R-2)  
Tele: 9245846

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Advocate

to be a copy

Government of Pakistan  
Finance Division  
(Regulations Wing)

28

F. No.4(2)R-2/2014-241

Islamabad, the 20<sup>th</sup> Sep., 2016

OFFICE MEMORANDUM

Subject: CLARIFICATION ON PROTECTION OF PAY OF GAZETTED CONTRACT EMPLOYEES ON REGULARIZATION/ APPOINTMENT ON REGULAR BASIS

The undersigned is directed to refer to this Division's OM of even number dated 07.04.2015 on the subject noted above:

2. The clarifications to the queries raised by Ministries/Divisions/ Departments and AGPR, Islamabad are conveyed as under:

S.No	QUERIES RAISED	CLARIFICATION
1	Finance Division's OM dated 07.04.2015 does not contain effective date of implementation from which date will it take effect?	The said O.M will take effect from the date of its issuance i.e 07.04.2015.
2	Whether the officer regularized from contract service prior to issuance of the said OM i.e. 07.04.2015 will also be entitled for protection of pay or otherwise.	Yes. However, no arrears are admissible prior to 07.04.2015.
3	Whether the officer whose services were regularized from development side to non development side on regular basis (development post to regular post) are entitled to pay protection.	Pay is protectable for those employees only whose contract appointment on development side, was made in BPS on standard terms and conditions issued by Establishment Division.
4	Whether arrears/back benefits to those employees are admissible whose service were regularized prior to the issuance of the said OM on 07.04.2015.	No arrears/back benefits are admissible prior to the issuance of the said OM on 07.04.2015.
5	Whether the concurrence of FPSC is required for all the cases of contract appointment/re-appointment beyond 02 years against civil post in BS-16 to BS-22 made or continue after 25.03.2010.	Being an administrative nature of issue, relates to Establishment Division/FPSC.

(Nadeem Ijaz Ahmad)  
Section Officer (R-2)  
Ph: 9245846

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All Ministries/Divisions/Departments

ATTESTED

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ADVISOR



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24. National Accountability Bureau, Islamabad.
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27. Pakistan Mint, Lahore.
28. DG Post Offices, Islamabad.
29. DG Secretariat Training Institute, Islamabad.
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32. Earthquake Reconstruction & Rehabilitation Authority (ERRA), P.M. Sectt. (Public), Islamabad.
33. Federal Tax Ombudsman's Secretariat, Islamabad.
34. Cost Accounts Organization, Islamabad.
35. Web Master, Finance Division, Islamabad.

(Nadeem Ijaz Ahmad)  
Section Officer(R-2)

Tele: 9245846

**ATTESTED**

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**ATTESTED**  
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Attorney

**ATTESTED**  
to be filed  
Attorney

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ANNEXURE - H

To  
The District Education Officer,  
Mohamand Tribal District.

Subject: Regularization from date of appointment  
i.e. 15.03.2004

Sir,  
most respectfully it is stated that I am  
serving as P.S.T since 15-03-2004 and I  
am doing duty for about 17 years. I got  
the order of 31.05.2021 which I took  
over charge in Zanawar Cheena but  
my other service was not counted which  
is more than 17 years.

It is, therefore requested that my  
services of 17 years be added in my  
services I will be thankful to you.

Obediently.

Rozi Gul Rozi Gul

P.S.T. Zanawar China

Dated 07.07.2021

ATTENDED  
to be true copy  
Advocate

# (POWER OF ATTORNEY)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

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

ROZI GUL

VS

EDUCATION DEPARTMENT

I, Rozi Gul do hereby nominated and appointed MUHAMMAD MAAZ MADNI, Advocate High Court, Peshawar, to be counsel in the above matter for me/us and on my/our behalf as agreed to appear, plead, act and answer in the above court or any appellate court or any court to which the business is transferred in the above matter as and is agreed to sign and file petition, appeals, statements, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc and to apply for and issue summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceedings that may arise there out; and to apply for and receive payment of any or all sums or submit the above matter to arbitration, and to employ an other legal practitioner authorizing him to exercise the power and authorities hereby conferred on the advocate whenever he may think fit to do so.

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

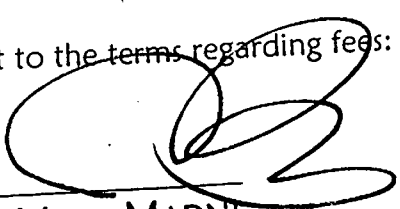
AND I/WE hereby agree to ratify and confirm all lawful acts done on my/our behalf; under or by virtue of these present or of the usual practice in such matter. PROVIDED always that I/WE undertake at the time of calling of the case by the court I/MY authorized agent shall inform the advocate and make him appear in the court, if the case may be dismissed in default, it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHERE OF I/We hereunto set MY/OUR hand to these presents, the contests of which have been explained to and understood by ME/US this 31<sup>st</sup> day of Oct 2021.

EXECUTANT

Rozi Gul  
(Rozi Gul)

Accepted subject to the terms regarding fees:

  
MUHAMMAD MAAZ MADNI,  
ADVOCATE HIGH COURT, PESHAWAR  
BC No. (BC-11-1460)  
CNIC No. 17101-9263898-1

OFFICE: KHATTAK LAW ASSOCIATES, Juma Khan Plaza, Warsak Road, Peshawar.  
Contact#: 0333-9313113, 0345-9090737

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD, 8B  
PESHAWAR.

No.

APPEAL No. 77 21 of 20 21

Razi Gul

Road

Appellant/Petitioner

Versus

The Director of Education Peshawar

RESPONDENT(S)

Respondent No. 3

Notice to Appellant/Petitioner

Distt. Accounts Offices

Mohmand Tribal Distt.  
Mohmand.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/7/22 at 9:00

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Copy of appeal is attached

for Reply

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

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

No.

APPEAL No. 77 21 of 20 21

Rozi Gul

Rozi

Appellant/Petitioner

Versus

the Director of Education Peshawar

RESPONDENT(S)

Respondent No. 3

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