20.07.2022

None present on behalf of the appellant. Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Respondents have failed to submit their written reply/comments even today. Vide order dated 22.12.2021, it was directed that the respondents shall positively submit reply/comments on the next date failing which their right for submission of reply/comments shall be deemed as struck off. The right of submission of written reply/comments of respondents thus stands struck off. To come up for arguments on 21.09.2022 before the D.B at Camp Court Abbottabad.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel through registered post for the date fixed.

(Salah-Ud-Din) Member (J) Camp Court Abbottabad

21st Sept 2022

Appellant in person present. Mr. Muhammad Jan, District Attorney alongwith Mr. Sohail Ahmad Zeb, Litigation Officer for the respondents present.

Appellant seeks adjournment on the ground that her counsel is not available today. Last chance is given to argue the case failing the case will be decided on the available record without arguments. To come up for arguments on 16.11.2022 before D.B at camp court Abbottabad.

(Fareena Paul) Member (Exeuctive) (Kalim Arshad Khan) Chairman Camp Court Abbottabad 13.10.2021

Mr. Ibrar Ahmed Khan, Advocate, for the appellant present. Preliminary arguments heard.

raised during preliminary Points arguments consideration, therefore, the appeal is admitted for regular hearing subject to all legal objections including the question of limitation. The appellant is directed to deposit security and Appellant Deposited

Security Process Fee process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 22.12.2021 before the S.B at Camp Court Abbottabad.

(SALAH-UD-DIN) MEMBER (JUDICIAL)

of consist of sorter to for any property

CAMP COURT ABBOTTABAD 7 2

22.12.2021

Learned counsel for the appellant present. Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present.

Notices be issued to the respondents with the directions to submit written reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck off. Adjourned. To come up for submission of written reply/comments on 16.02.2022 before the S.B at Camp Court Abbottabad.

> (Salah-Ud-Din) Member (J)

Camp Court Abbottabad

Due to Relievant of warthy Chairthe Tribund NON Functional to for the Same on Dated, 20-7-22 at camp court

## Form- A FORM OF ORDER SHEET

Court of	· · · · · · · · · · · · · · · · · · ·	
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Mo -	4964 12021	. ,

	-Case No	97 0 9 /2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/04/2021	The appeal of Mst. Phool Bibi presented today by post through Mr.  Ibrar Ahmad Khan Advocate may be entered in the Institution Register and
		put up to the Worthy Chairman for proper order please.
		REGISTRAR
2-		This case is entrusted to S. Bench for preliminary hearing to be put
	3-6-21	up there on 16-7-21. Notices be issued to
-	J. D.	up there on 16-7-21. Notices be issued to appellant/ counsal for the date rived.
		CHAIRMAN
	-	
	26.07.2021	This case belongs to territorial limits of Hazara
		Division and such cases were previously heard at camp
		Court, Abbottabad. May be notices issued to
		appellant/counsel have not been received by them,
		therefore, they are not in attendance.
		Fresh notices be issued to appellant/counsel for
		preliminary héaring on 13.10.2021 at camp court,
	-	Abbottabad.
		Champan
	i    -  -	

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

,	Service Appeal No of 202
Phool Bibi	Petitioners

#### Versus

Government of Khyber Pakhtunkhwa Chief Secretary Khyber through Pakhtunkhwa Peshawar etc . Respondents

#### **SERVICE APPEAL**

### **INDEX**

18#2 1845	Description of descri	Annexure	Page# 4
1.	Memo of Service Appeal	<b>-</b>	1-9
2.	Affidavit	- ,	10
3.	Correct addresses of the parties	•	11-12
4.	List of law books	-	13
5.	Copy of Letter dated 28:42:20:16 and 12.08.2017	"A & B"	14-15
6.	Copies of letter dated 28.11.2016.	"C"	16
7.	Copies Of Seniority list	"D"	17-19
8.	Copy of Notification	"E"	20-22
9.	Copy of Departmental Appeal.	"F"	23
10.	Wakalat Nama	•	24

Dated: 10.04.2021

Phool Bibi

(Petitioner)

Through

Abrar BRAR AHMED KHAN Advordig High Court

Advordig Vocate High Court

District Courts, (Mansehra)

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

Service Appeal No. \_\_\_\_ of 202

Khyber Pakhtukhwa Service Tribunai

Diary No. So33

Dato 23/4/2021

#### **Versus**

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2) Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Department Peshawar.
- 3) Director Elementary and Secondary Education, Peshawar.
- **4)** District Education Officer Female Mansehra.
- Khan presently residing at Governmet Girls Higher Secondary School Shahbaz Azmat Khail Bannu.

Registrar,

SERVICE APPEAL UNDER SECTION OF KPK **SERVICE** TRIBUNAL ACT 1974 DECLORATION TO EFFECT THAT APPELLANT IS ENTITLED TO BE PROMOTED SST, BPS-16 TO SS **BPS-17 CHEMISTRY** BEING ELIGIBLE AND AS PER SENORITY LIST SST VIDE DATED 10.10.2016 ISSUED BY RESPONDENT NO.3 AS PLACED ON SERIAL NO 1715 AND PROMOTION OF SERIAL NO 1820 RESPONDENT NO.5, THAT APPEALLANT IS MOST SENIOR



THAN RESPONDENT NO.5 ON THE BASIS OF SENORITY LIST PROMOTION ORDER OF FEMALE **BPS-16** TO SUBJECT SPECIALIST BPS-17 ELEMENTARY AND SECONDARY **EDUATION** DEPARTMENT VIDE NOTIFICATION NO SO(PE) MEETING/SST-SS,/2018 6/DPC 15.03.2018 ISSUED DATED RESPONDENT NO.2 THE AND **THEREAFTER** ADJUSTMENT ORDER \* **NOTIFICATION** NO. E&SED/4-16/2018/DPC SO(S/F) PROMOTION **BS-16** TO **BS-17** 13.04.2018 Dated RESPONDENT NO.5 AT SERIAL NO 86 IS OUT OF TURN AND NON **ISSUING OF PROMOTION ORDER APPEALLANT** AS MOST SENIOR THAN RESPONDENT NO.5 WHICH IS ILLEGAL, UNLAWFULL, WITHOUT LAWFUL AUTHORITY, DISCRIMINATORY, PERVESE. HANCE ...... UPON THE RIGHT OF APPEALLANT AND IS LIABLE TO BE SET ASIDE.

#### PRAYER: -

It is therefore, humbly prayed that on acceptance of instant appeal impugned notification of promotion order vide dated 15.03.2018 to the extent of Respondent No.5 may graciously be set aside and Respondent Department may kindly be declared to appellant as subject specialist in Chemistry w-e-f 15.03.2018 from the date of promotion of Respondent No.5 and therefore issued revised sonority list of SS Chemistry and any other relief may kindly be deem fit in favor of appellant may also be granted.

#### Respectfully Sheweth!

Brief facts to the instant appeal are also arrayed as under

- 1) That, the appellant is serving devotedly and utmost endeavors and to the best of her ability for the date of appointment and appellant is presently working as SST (B)-17 GGHS Behali Mansehra.
- That, the appellant is serving in the department with complete devotion dedication, to entire satisfaction of his superior and earns good result by dent of hard work and merit.
- 3) That, the appellant has possessed MSC Chemistry as per Sonority list of SST Female of E&SE Department vide dated 10.10.2016 appellant was placed on said No. 1715 whereupon appellant submitted all relevant documents i-e PER/ACR, Bio Data and non involvement certificate and all other relevant documents of Respondent No.3 through respondent promotion of SST (Science) BS-17 to subject specialist (SS) BS-17 as per seniority list.

(Copy of letter vide dated 28.1.2016) and 12.08.2017 attached at "A & B).

4) That, Respondent No.4 also issued a letter vide No. 16251-97 dated

28.11.2016 for submission of PERS to concerned Principal, whereupon appellant also submitted are PERs and relevant documents a well with time in the office of Respondent No.4

## (Copy of letter vide dated 28.11.2016 are annexed as annexure "C")

- (Science) BS-17 to SS Chemistry BS-17 alongwith B.Ed besides another factor of seniority cam fitness also taken into account for promotion for SST to SS.
- appellant was placed at Serial No. 1715 whereas Respondent No.5 was placed at Serial No. 1820 is below the Seniority and it is junior to the appellant.

## (Copy of Seniority list is annexed as Annexure "D").

7) That, respondent No.2 with malafide intention and by passing the relevant record and seniority list. promoted Respondent No.5 but did not promote the appellant as SST to SS (Chemistry) which amount to discriminatory attitude of Respondent department toward the appellant vide impugned notification 15.03.2018, and vide dated thereafter adjustment order notification vide dated 13.04.2018.



### (Copy of notification are annexed as Annexure "E")

appeal against impugned notification vide dated 15.03.2018 before appellate authority Respondent on 21.02.2021 and waited for 90 days but no reply has been received by respondent to the appellant so far.

(Copy of departmental appeal is annexed as Annexure "F").

9) That feeling aggrieved from the impugned notification dated 15.03.2018 passed by respondent No.2 appellant having no other remedy accept to file the present appeal before this worthy regular for notification inter-alia on following grounds.

#### GROUNDS: -

A) That, the impugned notification from SST to SS Chemistry of Respondent No.5 is illegal, discriminatory, unlawful, without lawful authority, perverse, arbitrary against the norms of justice and null and void upon the right of appellant.

- B) That, the appellant completed all requirements, formalities which are sine quo non for the promotion of appellant for SST (Science) BS-17 to Subject Specialist SS BS-17 (Chemistry) well before time and all the requisite documents as required were deposited in the office Respondent No.4 for the purpose of promotion against the said post but the appellant being senior respondent No.5 had not been promoted due to the reasons best known to the respondent Department.
- C) That, it is settled principle of law that promotion to the next higher scale is granted to those employees having qualified for promotion and on the basis of seniority deem fitness but the appellant has not been promoted and no reason of the same has been furnished to the appellant so far that respondent No.5 influential as well as blue eye chaps, therefore she has been promoted by respondents hence the department has violated the principle of law which envisages that something is not to be done in a particular manner that must be done and that matter and not otherwise.

- D) That, it is very sorrow state of affairs that right of the promotion of the appellant has been curtailed arbitrary which is against the purpose of good administration as well good governance besides the appellant is shuttling between the office of Respondent department for the redress of their grievances and still crying at the top of his voice but of no avail.
- hands while granting promotion to the appellant as SS chemistry on the Principle of qualification as well seniority came fitness. The service carrier due to the promotion of juniors from SST BS-16 SS BS-17 as subject specialist chemistry.
- F) That, this facts may not be left to fade oblivion that the appellant being senior and qualified had professional rights of promotion over respondent No.5 and is eligible to be promoted from SST to SS in subject of chemistry in all respect.
- G) That, this facts may also not be left the fade in oblivion that the appellant has illegally been disconnected by the respondent/

department and no stretch of the imagination/disentitle the appellant from promotion SST BS-16 to SS Chemistry -BS -17.

**H)** That, the other grounds would be urged with the part of strained at the time of arguments.

#### PRAYER: -

It is therefore, humbly prayed that on acceptance of instant appeal impugned notification of promotion order vide dated 15.03.2018 to the extent of Respondent No.5 may graciously be set aside and Respondent Department may kindly be declared to appellant as subject specialist in Chemistry w-e-f 15.03.2018 from the date of promotion of Respondent No.5 and therefore issued revised sonority list of SS Chemistry and any other relief may kindly be deem fit in favor of appellant may also be granted.

Dated: 10.04.2021

Phool Bibi (Petitioner)

Through

Abrar Khan Swatt Advocate High Court Advocate High Courts Mansehra

IBRAR AHMED KHAN

Advocate High Court
District Courts, (Mansehra)



#### **VERIFICATION**

I, PHOOL BIBI DAUGHTER OF SARDAR SHAH, SST B, GOVERNMENT GIRLS HIGHER SECONDARY SCHOOL BEHALI DISTRICT MANSEHRA, RESIDENT OF TEHSIL AND DISTRICT ABBOTTABAD DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING WRIT PETITON ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN OR SUPPRESSED FROM HONOURABLE COURT.

## PHOOL BIBI (DEPONENT)





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

	Service Appeal No	of 2020
		,
Phool Bibi	Petit	tioners

#### Versus

Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar etc .**Respondents** 

#### SERVICE APPEAL

#### **AFFIDAVIT**

I, PHOOL BIBI DAUGHTER OF SARDAR SHAH, **GOVERNMENT** SST **GIRLS SECONDARY** BEHALI SCHOOL DISTRICT MANSEHRA, RESIDENT OF **TEHSIL** DISTRICT **ABBOTTABAD** DO SOLEMNLY AFFIRM AND DECLARE ON OATH THAT NO SUCH SUBJECT MATTER REVISION PETITION HAS EVER BEEN FILED NOR PENDING NOR DECIDED. THAT CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE COURT.

PHOOL BIBI

(DEPONENT)

IDENTIFIED BY: -

Abrar Khan Swati
Advocate High Court
District: Court Mansehra



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

#### Versus

Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar etc .**Respondents** 

#### **SERVICE APPEAL**

#### **CORRECT ADDRESSES OF THE PARTIES**

#### Respectfully Sheweth!

Correct addresses of the parties are as under:-

#### **PETITIONER**

Phool Bibi daughter of Sardar Shah, SST B, Government Girls Higher Secondary School Behali District Mansehra, resident of Tehsil and District Abbottabad.

#### RESPONDENTS

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 2) Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Department Peshawar.
- **3)** Director Elementary and Secondary Education, Peshawar.
- **4)** District Education Officer Female Mansehra.
- 5) Parveen Bibi daughter of Yousaf Khan presently residing at Government Girls

Higher Secondary School Shahbaz Azmat Khail Bannu

Dated: 10.04.2021

Phool Bibi

(Petitioner)

Through

**IBRAR AHMED KHAN** 

Advocate High Court District Courts, (Mansehra)

Districe Courts Manso fra



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

	Service Appeal No of 2020
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Phool Bibi	Petitioners

#### Versus

Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar etc .**Respondents** 

#### **SERVICE APPEAL**

#### **LIST OF LAW BOOKS**

#### Respectfully Sheweth!

List of Law Books are as under:-

- 1) The Constitution of Islamic Republic of Pakistan, 1973.
- 2) Any other law book will be provided.

Dated: 10.04.2021

Phool Bibi (Petitioner)

Through

IBRAR AHMED KHAN

Advocate High Court District Courts, (Mansehra)

Advost Courts Manson

(14)

Aconsure A

### OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

No <u>17084</u> | Dated <u>28)w/</u> /2016.

To,

The Director,
Elementary & Secondary Education
Peshawar.

SUBJECT:-

SUBMISSION OF PERS IN RESPECT OF PHOOL BIBI SST.

Memo:-

Enclosed please find herewith PERs/ACR in respect of Phool Bibi SST (Sec :) Govt: Girls Higher Secondary School Behali District Mansehra for the period of 2009 to 2015 for further necessary action Please.

DISTRICT EFUCATION OFFICER (FEMALE) MANSEHRA.

Abrar Khan Swati

(13)

Assure B

### OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

To

The Director

(E&SE) Khyber Pakhtunkhawa

Peshawar.

Subject:-

PERS IN RESPECT OF PHOOL BIBI SST (SCIENCE)

Memo,

Enclosed please find herewith PERs in respect of Mst. Phool Bibi SST (Science) Govt Girls Girls Higher Secondary School Behali (Mansehra) for the year 2009 to 2016, are submitted for further necessary action.

DISTRICT EDUCATION OFFICER

District Education Officer

Abrar Khan Swati
Abrocate High Court
District: Courts Mansons

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

~To

All the Principals/Head Mistress GGHSSs/GGHSs/GGMSs (Detail given below) in District Mansehra

Subject:-

SUBMISSION OF PERS

Reference Director E&SE Khyber Pakhtunkhawa Peshawar vide No. 1507-1557 Memo: Dated 19.07.2016 & this office direction, the following SSTs of your school have submitted their PERs for promotion from SST To SS. All the PERs submitted in the office of the Director E&SE Khyber Pakhtunkhawa Peshawar vide No. 14033 Dated 13.10.2016, but returned the PERs in respect of the following SSTs with the direction that the PERs may be submitted w.e.f. the date of regular appointment against SST post instead of last five years.

Yours are therefore, directed to submit their PERs duly complete in all respect w.e.f. the date of lst: Appointment against SST post within one week positively for onward

submission to the quarter concerned.

1 Uzma Zeb MA/M.Ed GGHSS No.2 Mansehra Bio 2 Tasleem Yaseen MA/M.Ed GGHS Lassan Thakral Bio 3 Naima Sultana M.Sc GGHS Battal Chemistry 4 Phool Bibi M.Sc/M.Ed GGHS Behali Chemistry 5 Shabana Azeem M.Sc GGHS GHUllah Chemistry 6 Gul Naz MA/M.Ed GGHS Khawari Economics 7 Barsila Zaib MA/M.Ed GGHS Khawari Economics 9 Sadaf Quratuhiain MA/M.Ed GGMS Sanda Sar Economics 10 Robina Shaheen MA/B.Ed GGMS Chairah Economics 11 Shaista MA/M.Phil/M.Ed GGMS Sanda Sar English 12 Faiza Tabasum MA/M.Ed GGMS Chairah English 13 Shafiqua Bibi MA/M.Ed GGMS Chairah English 14 Saima Noreen MA/B.Ed GGHS Mohayian English 15 Saima Noreen MA/B.Ed GGHS Mohayian English 16 Sumaira Iqbal MA/M.Ed GGHS Murad Pur English 16 Sumaira Iqbal MA/M.Ed GGHS Murad Pur English 17 Farzana Sanam MA/B.Ed GGHS Murad Pur English 18 Chaman Ara MA/M.Ed GGMS Ichrian English 19 Nouseen Rashid MA/M.Ed GGMS Ichrian History 19 Nouseen Rashid MA/M.Ed GGHS Mohayian History 20 Mehnaz Shah MA/M.Ed GGHS Mohayian History 21 Nazia Manzoor MA/B.Ed GGHS Mohayian History 22 Farhat Ismail MA/M.Ed GGHS Mohayian History 23 Javeria Aziz MA/M.Ed GGHS Mohayian History 24 Rashida Parveen MA/B.Ed GGMS Bandi Sadiq Islamyat 25 Bibi Rabia MA/M.Ed GGMS Bassund Islamyat 26 Ayesha Huma MA/B.Ed GGMS Bassund Islamyat 27 Syed Atia Zahoor MA/B.Ed GGMS GGMS Trangri Bala Islamyat 28 Samina Gul MA/M.Ed GGHS M.M. Pol Urdu 39 Sachada Sachada Bibi MA/M.Ed GGHS M.M. Pol Urdu 30 Shahnaz Faqir MA/M.Ed GGHS M.M. Pol Urdu 31 Saeeda Bibi MA/M.Ed GGHS Shengar Urdu 31 Saeeda Bibi MA/M.Ed GGHS Shengar	sub	mission to the quarter concern	ed. Present School	Sub	oject in Master
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,	PUKHTUNKHWA STOOD ON 10-10-2016						
S.No.	Name /Father Is Name/ QualificationIs	School	Year of Passing B.Ed /Merit	Date of Birth / Domecile	Date of Ist: Apptt: in Edu:Deptt:	D/o Apptt / Approval of SET Post	Remarks
1	2	3	4	5	6	7	8
′ 1	Kausar Naheed MSc B.Ed D/O Shahi Khan	ASDEO(F)CHD	1984./442/10 00	22.6.56/Peshawar	9.12.85.	2.10.88	
2	Nighat Yasmeen BA B.Ed D/O Muhammad Yousaf	GGHS No2 A.Abad	00/636/1000		2.6.88	13.10.88	
3	Shamim Bibi BA BED D/ O Abdul Rashid	GGMS Boghara Karak	1986/4543/1 000	03.07.196/Bannu		20.10.89	
_ 4	Rehana Kausar BA Bed D/O Mirza Ashraf	GGMS Kot Wali A.Abad	1980/479/12 00/310/1000	02.01.1960/A.Abad		21.12.89	
5	Khatija Said BSc Bed D/O Said Badshah	GGHS Haji Gali A.Abad	1983/598/10 00	03.03.1963 / Mansehra		21.12.89	
6	Lubna Tabasam BSc Bed D/O Faqir Hussain	GGHS Utmanzai	1988/562/10 00	10.4.64/Peshawar		21.12.89	
7	Nighat Yasmeen BA Bed D/O Haq Nawaz Gandapur	ASDO(F) D.I.Khan	1985/742/12 00/618/1000	22.4.60/D.I.Khan		23.12.89	-
8	Shaheena Yasmeen BSc Bed D/O Abdur RehmanS	GGHS Shakardara Kohat	1986/558/10 00	1.6.60/Kohat	6.6.88	23.12.89	
9	Mehmooda Sultana MSc Bed D/O Sultan Bahadar	GGHS Sirikot Haripur	1983/475/10 00	11.04.1963/Haripur	3,10.89s	26.11.90	
10	Perveen Akhtar BA BED D/O Khan Badshah	GGHS Thati Nsratti	1986/422/10 00	1.6.60 / Kohat		26.11.90	
11	Farhat Jehan BA DED D/O Said Shah	GGHS Swabi	1986/521/10 00	7.2.60/Mardan	9.12.82	26.11.90	
12	Vectoria Naheed BA BED D/O Raja Mark	GGMS Dak Besud NSR	1986/459/10 00	1.6.62/Peshawar	18.3.90	26,11,90	
13	Nazneen Zubeda BA BED D/O Muhabat Shah	GGHS Katlang Mardan	1986/428/10 00	Peshawar		26.11.90	
14	Rahila Tabuasum MA BED D/O Abdul Khaliq	ASDEO(F)Mansehra	1988/808/12 00/673/1000	07.08.1961 / Mansehra		26.11.90	
15	Fuzia Rahim MSc BED D/O Abdur Rahim	GGHS Yakatoot Peshawar	1988/464/10 00	06.03.1961 / Peshawar		26.11.90	
16	Hajra Bibi BA BED D/O Haidar Zaman	GGHS Havelian A.Abad	1989/6 <b>4</b> 5/10 00	08.04.1966/A.Abad	11.10.89	28.11.90	
17	Bushra Naeem BSc BED D/O Fazal Din	GGHS Akora Khatak	1989/552/10 00	1.1.61/Peshawar	10.10.85	3.12.90.	
18	Bibi Aziz Fatma BA BED D/O Muhammad Hussain Shah	GGHSS Peshawar	1986/435/10 00	Kohat		4.12.90	,

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	1807	Umbarin Shah D/O Rasool Shah	GGCMHS KARAK		07/02/1983 Karak	25/11/2008	01/01/2009
ı	1808	Uzma Noreen D/O Muhammad Rehmat Khan	GGHSS Koti Sadat Bannu	•	15/03/1979 Bannu	25/11/2008	01/01/2009
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	1810	Aisha Banaras D/O Muhammad Banaras	GGHSS Behali Mansehra	2005	13/04/1982/Mansehra	25/11/2008	01/01/2009
	1811	Zenat Haram D/O Abdul Azeem	GGHS Timergara Dir Lower		01/03/1983 Dir Lower	25/11/2008	01/01/2009
	1812	Irum Naz D/O Pir Muhammad	GGCHSS Peshawar	2004	02/03/1982/ Peshawar	25/11/2008	01/01/2009
	1813	Sumira D/O Khan Bahader	GGNMS Ahmed Khan Killi Jar	2005	10/04/1981/Mohd:Agy:	25/11/2008	01/01/2009
	1814	Salma Gul D/O Taj Muhammad	GGHS Tambulak Mardan		08/10/1977 Mardan	26/11/2008	01/01/2009
	1815	Amina Bibi/Elahi BaKhsh	GGHS No.04 DIKhan	2000	09/03/1978 DIKhan	26/11/2008	01/01/2009
	1816	Bibi Saima/Syed Nazir Ahmad Shah	GGHS Moorat Mera		15/03/1982 Mansehra	26/11/2008	01/01/2009
	1817	Gul Shan Parveen D/O Ghulam Hashim	GGHS Mallana DIKhan	2005	15/09/1982 DIKhan	26/11/2008	01/01/2009
	1818	Javairia Sakhi D/O Sakhi Muhammad Tanoli	GHSS Shinkiari		17/01/1986 Mansehra	26/11/2008	01/01/2009
	1819	Nadia Naz D/O Muhammad Nawaz	GGHS Mallana DiKhan	2003	15/03/1981 DIKhan	26/11/2008	01/01/2009
ł	1820	Parveen D/O Yousaf Khan	GGHSS NO.1 KARAK		24/09/1982 KARAK	26/11/2008	01/01/2009
	1821	Sadaf Iqbal D/O Asif Iqbal	GGCMS Lakki Ghundaki Karak		03/05/1986 KARAK	26/11/2008	01/01/2009
7	1822	Samina Bukhari/Syed Dost Muhammad Shah	GGHS Babar Pacca DIKhan	2002	01/04/1983 DIKhan	26/11/2008	01/01/2009
	1823	SHAISTA ZEB/MUHAMMAD SHUAIB	GGHSS MANDANI		05/05/1978 Charsadda	26/11/2008	01/01/2009
	1824	Shazia Ambreen/Rehmat Ullah Awan	GGHS Mallana DIKhan		20/05/1977 DIKhan	26/11/2008	01/01/2009
	1825	Shazia Khalid D/O Khalid Zaman	GGHS;Chall Shagai	2001	01/04/1978 Swat	26/11/2008	01/01/2009
	1826	Sonia sultana/Sultan Khan	GGHS Fatehpur		15/06/1982 Chitral	26/11/2008	01/01/2009
ł	1827	TAIBA KHATTAK/MUHAMMAD RAFIQUE	GGMS KAMALI BANDA		22/10/1976 KARAK	26/11/2008	01/01/2009
ł	1828	Uzma Bibi/Qureshi Abdul Latif	GGCMHS No.01 DIKhan	2010	01/05/1982 DIKhan	26/11/2008	01/01/2009
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District: Sourts Mansehra







## GOVERNMENT OF KHYBER PAKHTUNKITWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the April 13th, 2018 100

#### NOTHER ATTON

NO SO(S F)E&SFD.4-16 2018/DPC/Promotion/BS-16 to BS-17: Consequent upon matter of Family 88 Secondary Education matter of Family 88 Secondary Education Dep. thront vite this department notification No. SO(P1 12-6 DPC Meeting SST-SS/2018 dated 18 in 2018 the Competent Nationally is pleased to adjust them as follows:

[18 in 2018 the Competent Nationally is pleased to adjust them as follows:

S	Name of Officer and School Address	Proposed place of Posting	Kemm
•	<u> </u>	English	
; - j-		SS BS-17 English GGHSS Kota Swabi	A.V.P
2		SS English BS-17 GGHSS Ogi Manschra	AVP
.1	Shinkirai Mansehra Mst. Saima, MzaUSSI GGHS Chiita	SS English BS-1" GGHSS Kalabat	AVP
ų.	Botta Manschra  Mst. Lozia (c. 887) 66018 Imazur	Swabi 88 English BS-1" GGHSS Utar Khel	ANP
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No TAIDA will be allowed for joining their duties.

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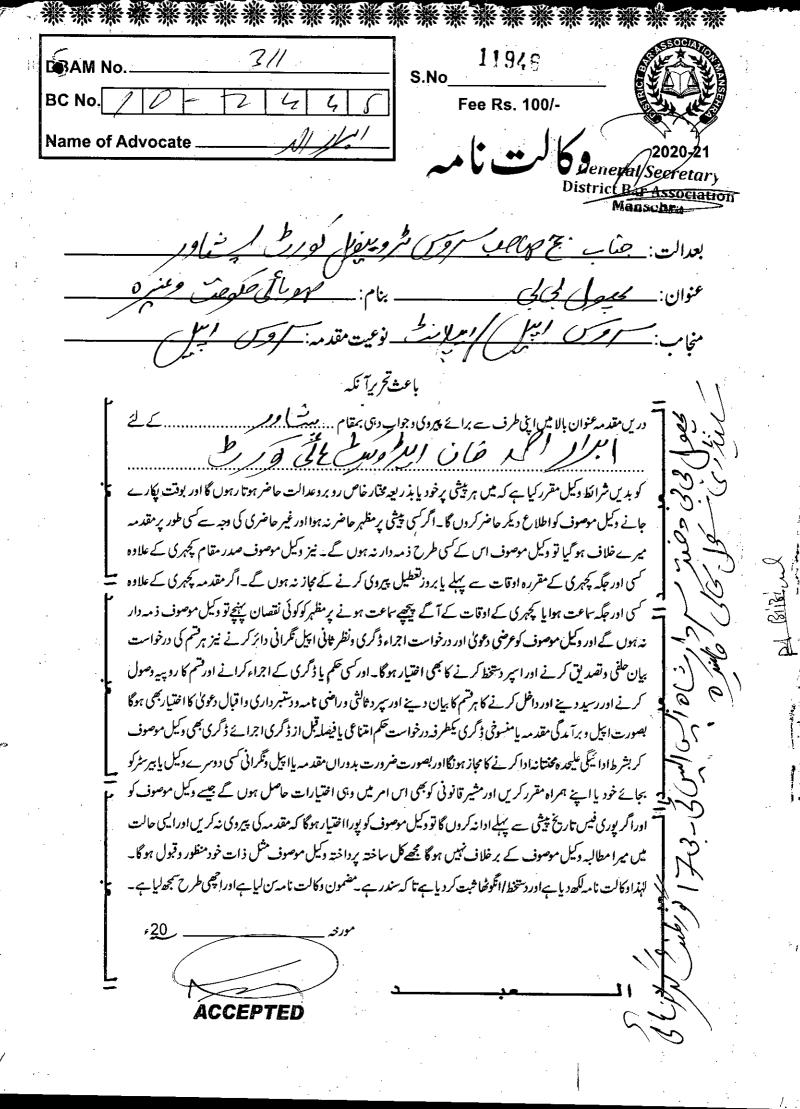
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- Accountant General Khyber Pakhmakha, Pash war
- 2 Director E&SF Khyber Pakhninkhy Pelbinsar
- 3 Director Education (FATA) FATA Secretary 1 Wile of Star Appendix
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- 5 Director PITF Khyber Pakhrankhwa.
- 1 Director RITE (F) Khyae: Pakhtun shwa
- District Education Officers of emale) concerned
- 8 District Accounts Officers concerned
- 9 PS to Principal Secretary to Chief Moister Khyber Pakhtunkitwa Company
- 10 PS to Chief Secretary Khyber Plante ikho Per S. t.
- 11. PS to Minister E&SF Khyber Pakotankhya Pelin (4.3)
- 12 PS to Secretary E&St Den atment
- 13 PS to Special Secretary PASE Department
- 14 Incharge PMISE TASE Department to up to a to the action
- (5) Subject Specialists concerned.
- 6 Office order file

ANEELAFAHM SECTION OFFICER SCHOOLS (CMM)

رمت مناب سرر الماري البراز كى افرا سلورى الحوامين لسنادر معنون السيادر معنون السيادر عمر على المرا سلورى المحامد المعنون السيادر معنون السيل المنا يردوسون على 35 م 35 م 35 م 35 م الزارس سے در اللہ بھول ب بی درندی رز از سندی سول عالی درون ماليم ويس (مع) 55T (11.8) بس رين زالف سراعا د عرى ميل. 5.00 600. U.S. J. Seniorily List 5 10/10/2016 Uh . - Lie (17/5) بے جلا ہوری کا (5/00) کی 1820 کے روزی کا س عرف میں کا حق میا علہ ان سے اعامل استانی روی وروری (55. Chemistry). = 1860 - 2 2018 کا اب ریزش آدور 111 Seniority Ust 6 2016 درفرات کافیسیاں سے جا ۔ سے درفواست ہے کہ مشرم بالا معلم کر ذیر فور لابا جا ۔ ارر ساند كو الصاف ديا جاب Ju mp. please المطارص 20/1/2021 55T/scr) B-17 3 U. Jege کای و مراب ای ورد لاف مانسره 272 20/01/2021 : 201 0331-5723626 0348-3358986 Atrar Khar Spati

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

No. APPEAL N	10 9969	
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	Versus	
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Counsel	ner Ibrar Ahed Khan	
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Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on

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.

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at Weshamen

Kegistrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

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

No.

APPEAL No. 4964 of 2021.

Appellant/Petitioner

Versus

Notice to Appellant/Petitioner

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Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on at a graph at the second se

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.

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at Weshamar

Registrar,

Khyber Pakhtunkhwa\Service Tribunal,

Peshawar

#### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

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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.

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Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

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#### "B"

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

No.
Appeal No. 49.64 of 20 21
Appeal No
Versus Ash
Versus  in vivocogia Christ Segis Respondent  Respondent No.
Respondent No.
Notice to: - Dist. Education Office (F) Manselva.
Man Selvia.
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa
Province Service Tribunal Act, 1974, has been presented/registered for consideration, in
the above case by the petitioner in this Court and notice has been ordered to issue. You are
nereby informed that the said appeal/petition is fixed for hearing before the Tribunal
at 8.00 A.M. If you wish to urge anything against the
appenant/petitioner you are at inperty to do so on the date fixed, or any other day to which
Adversary duly symported by any
Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of bearing 4
this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in
default of your appearance on the date fixed and in the manner aforementioned, the
appeal/petition will be heard and decided in your absence.
Notice of any alteration in the date fixed for hearing of this appeal/petition will be
given to you by registered post. You should inform the Registrar of any change in your
address. If you fail to furnish such address your address contained in this notice which the
address given in the appeal/petition will be deemed to be your correct address, and further
notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.
Copy of appeal is attached. Copy of appeal has already been sent to you vide this
office Notice Nodated
Given under my hand and the seal of this Court, at Peshawar this
Day of
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al conficulty
at Camp Caust A. Alast. Registrar,
Khyber Pakhtunkhwa' Service Tribunal,
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Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

2. Always quote Case No. While making any correspondence.

#### "B"

## KHYBER PAKHTUNKF IWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMIPLEX (OLD), KHYBER ROAD,

		PESHAWAR.	نبع	TB_
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Province Services the above case by hereby informed *on appellant/petition the case may be Advocate, duly su this Court at lead alongwith any of default of your a appeal/petition w	Tribunal Act, 1 the petitioner is that the said a mer you are at lib postponed either apported by your st seven days be ther documents appearance on the cill be heard and	tion under the provision .974, has been presented on this Court and notice has appeal/petition is fixed for at 8.00 A.M. If you wish berty to do so on the date er in person or by author power of Attorney. You are fore the date of hearings upon which you rely. If the date fixed and in the decided in your absence.	registered for co as been ordered to be hearing befor he to urge anythic fixed, or any oth brised representa are, therefore, rec g 4 copies of wri Please also take e manner afores	onsideration, in to issue. You are the Tribunal ing against the er day to which ative or by any quired to file in tten statement notice that in mentioned, the
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Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar

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

2. Always quote Case No. While making any correspondence.

#### "R"

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

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	<u> </u>	1 Versus		Respondent	1.8h.
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Notice to:	point: leg	F BER	le inth	missin er	reg se
/		Pe	Shame	L.	0 0
WHEREAS	S an appeal/peti	//			
Province Service	e Tribunal Act, 1	1974, has been	presented/reg	istered for consi	ideration in
the above case by	y the petitioner i	n this Court an	id notice has h	een ordered to is	ssue Vou are
*on	d that the said a	at 8.00 A.M.	I is fixed for i	aearing betore t o urge anything	he Tribunal
appenant/petitio	oner you are at lil	berty to do so a	on the date fixe	ed, or any other o	day to which
the case may be	postponed cithe	er in person o	r by authorise	ed representativ	e or hy any
Advocate, duly st this Court at lea	ast seven days be	efore the date	orney. You are, of hearing 4	copies of writte	red to file in
alongwith any o	other documents	supon which	vou rely. Plea	ase also take no	tice that in
default of your appeal/petition v	appearance on t	the date fixed	and in the m	nanner aforemer	itioned, the
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	GOLLER	TARY K	hyber Pakht	unkhwa Service	e Tribunal,
Note: 1. The hours of		aintu Mhwa		Peshawar.	
2. Always quote	attendance in the court are e Case No. While making an	: uie same mat of the High Ny correspondence.	gn Court except Sunday	y and Gazetted Holidays.	•



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

No.	<i>}</i>		11/3
,	Appeal No496	<i>L</i> 0.020 ×	
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	innough they	Respondent No.	Atom
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Notice to: _	- o fitt 10 06 11	verigh Seig!	Elli, Vi
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Province So the above ca hereby info *on/ appellant/pethe case ma Advocate, d this Court a alongwith a default of y appeal/petit Notice given to you address. If y address give notice poste this appeal/petit		en presented/registered for and notice has been order on is fixed for hearing both. If you wish to urge and on the date fixed, or any or by authorised represente of hearing 4 copies of the you rely. Please also the ed and in the manner afrour absence.  The detection of this apprinted for hearing of this apprinted in the Registrar of a sur address contained in the emed to be your correct as st will be deemed sufficient.	or consideration, in red to issue. You are before the Tribunal sything against the sything against the sother day to which sentative or by any experience to file in written statement ake notice that in forementioned, the beal/petition will be any change in your his notice which the ddress, and further at for the purpose of
Сору	of appeal is attached. Copy of ap	<del>peal has already been se</del>	nt to you vide this
office Notice	e Noda	ıted	
Given	under my hand and the seal of t	this Court, at Peshawar t	his
Day of	Jan;	20	11.
at c	fump Court A Ab	Revision Revision Khyber Pakhtunkhwa Peshaw	Service Tribunal,

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

2. Always quote Case No. While making any correspondence.

Note:

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

No. 18
Appeal No. 43 64 0520 21
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Versus (Meh.
through thing Sour the Respondent
Respondent No
Notice to: _ Divector, Efe. 2 Sec. Edice Their Grant.
pefte Varhamer.
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa
Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are
hereby informed that the said appeal/petition is fixed for hearing before the Tribunal
*onat 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which
the case may be postponed either in person or by authorised representative or by any
Advocate, duly supported by your power of Attorney. You are, therefore, required to file in
this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in
default of your appearance on the date fixed and in the manner aforementioned, the
appeal/petition will be heard and decided in your absence.
Notice of any alteration in the date fixed for hearing of this appeal/petition will be
given to you by registered post. You should inform the Registrar of any change in your
address. If you fail to furnish such address your address contained in this notice which the
address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of
this appeal/petition.
Copy of appeal is attached. Copy of appeal has already been sent to you vide this
office Notice Nodateddated
Given under my hand and the seal of this Court, at Peshawar this
Day of
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Revistrar
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

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