


17.10.2022

Nemo for appellant.

Notices be issued to appellant and his counsel for the date fixed. To come up for preliminary hearing on 14.11.2022 before S.B at camp court Abbottabad.


(Fareeha Paul)
Member (E)

17.05.2022

Clerk of learned counsel for the appellant present.
Mr. Muhammad Asif Masood, Deputy District Attorney
for respondents present.

Written reply/comments not submitted. Learned
DDA seeks further time for submission of written
reply/comments. Last opportunity is granted for
submission of written reply/comments. To come up for
written reply/comments and preliminary hearing on
15.06.2022 before S.B at camp court Abbottabad.

3000 |

4

(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

15.06.2022

Junior to counsel for appellant present:

Muhammad Riaz Khan Paindakheil, learned Assistant
Advocate General for respondents present.

Reply on behalf of respondents is still awaited. Learned
AAG requested for adjournment in order to submit reply/comments.
Adjourned but on payment of cost of Rs.3000/- to be paid on behalf
of respondents. To come up for reply/ preliminary hearing on
15.08.2022 before S.B at Camp Court, Abbottabad.

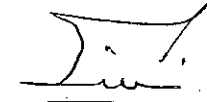


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

23.12.2021

Learned counsel for the appellant present.

On previous, it was directed that pre-admission notice be issued to the respondents, however the same has not been issued, therefore, explanation in this respect be called from the Moharrar. Pre-admission notice be issued to the respondents through registered post for submission of reply/preliminary arguments on 20.01.2022 before the S.B at Camp Court Abbottabad.



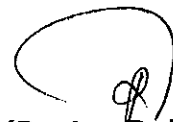
(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

20.01.2022

Appellant present through representative.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Muhammad Usman Incharge Litigation for respondents present.

Reply on behalf of respondents is still awaited. Representative of respondents requested for time to submit reply/comments; granted by way of last chance. To come up for reply and preliminary hearing on 15.03.2022 before S.B at Camp Court, Abbottabad.





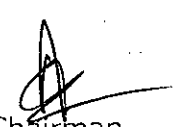
(Rozina Rehman)
Member (J)
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7684/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/10/2021	<p>The appeal of Munazza Khatoon presented today by Mr. Munir Hussain Lughmani Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at Abbottabad for preliminary hearing to be put there on <u>03/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	03.12.2021	<p>Counsel for the appellant present. Pre-admission notice be issued to the respondents. Case to come up for reply/preliminary hearing on 23.12.2021 before the S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp Court, A/Abad</p>

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

Case Title: Munazza Khatoon vs Govt of KP through Sec Education & others

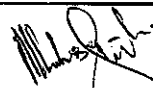
S.#	Contents	Yes	No
1.	This appeal has been presented by: _____		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which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

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

Name:

MUNIR HUSSAIN LUGHMANI

Signature:



Dated:

27 OCTOBER 2021

**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CAMP COURT ABBOTTABAD**

Appeal no. 7684/2021

Munazza Khatoon.....Appellant

VERSUS

The Govt. of KPK through Secretary
Elementary and Secondary Education
etc.....Respondents

APPEAL

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5.	Copies of degrees, experience certificate and yearly timetable	"C, D & E"	21-31
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Dated 27.10.2021

Mst. Munazza Khatoon
MST. MUNAZZA KHATOON
 (Appellant)

Through:-

Munir Hussain Lughmani
MUNIR HUSSAIN LUGHMANI
 ADVOCATE Supreme Court
 Of Pakistan

&

Muhammad Saqib Lughmani
MUHAMMAD SAQIB LUGHMANI
 ADVOCATE High Courts
 Mansehra

①

**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CAMP COURT ABBOTTABAD**

SERVICE APPEAL NO ___ OF 2021

Munazza Khatoon daughter of Habib
Shah, Govt. Girls Higher Secondary
School No. 2 Mansehra.....**Appellant**

VERSUS

- 1) Government of Khyber
Pakhtunkhwa through Secretary
Elementary and Secondary
Education Peshawar.
- 2) Secretary Establishment,
Government of Khyber
Pakhtunkhwa Peshawar
- 3) Secretary Finance, Government of
Khyber Pakhtunkhwa Peshawar
- 4) Director Elementary and Secondary
Education Peshawar.
- 5) District Education Officer (Female)
Mansehra.....**Respondents**

**SERVICE APPEAL UNDER SECTION
4 OF KPK SERVICE TRIBUNAL ACT,
1974, AGAINST THE ACT OF
RESPONDENTS WHILE NOT
CONSIDERING APPELLANT WHO IS
OTHER WISE ELIGIBLE BASED ON
HER QUALIFICATION AND
EXPERIENCE FOR THE PAYMENT
OF GRADED PAY BPS-17 AND
ABSORBED/ PROMOTED IN BPS-17
AGAINST THE POST OF DIRECTOR
PHYSICAL EDUCATION (DPE) AS
KNOWN AS INSTRUCTOR PHYSICAL**

EDUCATION (IPE) SINCE 01.10.2012, IS AGAINST THE LAW, PERVERSE, DISCRIMINATORY, MALAFIDE AND NOT MAINTAINABLE UNDER THE LAW.

PRAYER:-

On acceptance of the instant service appeal, respondents may graciously be directed to absorb/ appoint the appellant as DPE as known as IPE with effect from the date of teaching higher secondary classes i.e., 01.10.2012 and graded pay BPS-17 for additional charge may also be allowed with all service back benefits.

Respectfully Sheweth:-

BRIEF FACTS:-

1. That, the appellant was appointed as Physical Education Teacher (PET) in BPS-15 at Govt. Girls Middle School Mera Amjad Ali vide office order No. 6724-66 dated 04.05.2009. The appellant was subsequently transferred to Govt. Girls High School, No 2 Mansehra vide order No. 17522-26 dated 07.12.2010.

(Copies of appointment order and transfer order are attached as annexure "A" & "B").

2. That, the appellant is qualified as M.Sc Health and Physical Education and having 7 years teaching

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experience against the post of DPE/
IPE (BPS-17).

(Copies of degrees, experience certificate and yearly timetable are attached as annexure "C", "D" and "E").

3. That, the appellant is teaching the subject of Physical Education to the Higher Secondary Classes with complete devotion and dedication. The appellant is dedicated teacher and earned best teacher certificate on Salam Teachers Day dated 05.10.2011.

(Copy of best teacher award is attached as annexure "F").

4. That, the appellant thereafter was promoted to the post of Female Senior PET BPS-16, on the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of KP Elementary and Secondary Education vide notification date 11.07.2012 and Finance Department endorsement date 16.07.2012.

(Copy of promotion letter is attached as annexure "G").

5. That, after issuance of this Notification the petitioner re-joined service in the same school.

6. That, a post of DPE/ IPE (BPS-17) was lying vacant in the said school and during a surprise visit of Ex. Executive District Officer Mansehra in Govt. Girls Higher Secondary School No. 02, Mansehra, the appellant was directed by the competent authority to teach the subject of Physical Education to Higher Secondary Classes vide order No. 2701-03 dated 01.10.2012.

(Copy of letter of EDO is attached as annexure "H").

7. That, since the issuance of the office order dated 01.10.2012 the appellant is serving as DPE/IPE in the Govt. Girls Higher Secondary School No. 2 Mansehra, teaching the subject of Physical Education being qualified to the Higher Secondary Classes. The respondents neither paid graded pay for Grade 17 on account of the additional charge since 01.10.2012 nor absorbed/ appointed the appellant as DPE/ IPE against the vacant post in the said school.

8. That, the appellant feeling aggrieved filed departmental appeal to the respondent No. 05 for redressal of her grievances but the respondents

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department did not bother to reply back to the appellant.

(Copy of departmental appeal is attached as annexure "I").

9. That, the appellant filed writ petition No. 678-A/2015 before the Honourable Peshawar High Court, Abbottabad Bench. The Honourable High Court directed the appellant to approach the competent forum vide order date 25.06.2015.

(Copy of writ petition and order are attached as annexures "J" & "K").

10. That, the appellant filed Service Appeal No. 885/2015 before the KP Service Tribunal, Peshawar on 06.08.2015 for promotion to the post of DPE/IPE BPS-17 as the appellant was working against the post of DPE/IPE since 01.10.2012.

(Copy of appeal is attached as annexure "L").

11. That, the respondent No. 05 constituted an Inquiry Committee vide Endstt: No. 21065-67/Estt: Branch. AE-1/PET dated 24.01.2017, to verify the officer order issued under Endstt: No.2701-03 dated 01.10.2012, issued by Ex-EDO (E&SE) Mansehra the application submitted by the

petitioner whereby she has asked for her legal right to be appointed at the post of DPE/ IPE. 24.01.2017. The inquiry committee was comprised of two senior female teachers. It was a void ab-initio order as the DEO is not a competent authority for the SPET who is in Grade 16 whereby the Director is authorized to conduct any such inquiry.

(Copy of letter is attached as annexure "M").

12. That, the respondent No. 05 withdrew the officiating charge vide Endstt: No 10414-17/CT(F) dated 22.10.2015 reverting the appellant illegally without providing any valid reason while the service appeal was pending before this Honourable Tribunal.

(Copy of letter is attached as annexure "N").

13. That, the learned KP Service Tribunal vide its judgement dated 18.09.2017, was pleased to dismiss the appeal. However while dismissing the appeal the learned Service Tribunal was pleased to pass further order as, "The appeal is therefore dismissed, however, the department is directed to consider the claim of the appellant for pay/

additional charge allowance for the period for which she had been serving in officiating capacity on the higher post and decide same on the merit”.

(Copy of the decision of KP Service Tribunal is attached as annexure “O”).

14. That, being aggrieved of the impugned order of KP Service Tribunal, the appellant approached the Honourable Supreme Court of Pakistan and filed a Civil Petition C.P. No.4813/2017 dated 17.11.2017.

(Copy of the Civil Appeal before the Honorable Supreme Court is attached as annexure “P”).

15. That, the learned Advocate General KP, contended before the apex court that the very letter dated 01.10.2012 on the basis of which the petitioner claimed to have given officiating charge of DPE, was a fake document for that she is facing disciplinary proceedings which have not been concluded owing to pendency of the case before the Honourable Supreme Court.

16. That, the Honourable Supreme Court of Pakistan was pleased to

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pass the judgement on 18.10.2019, thereby mentioning that, "In the circumstances, the disciplinary proceedings, if any, which the respondents want to take against the petitioner be conducted and concluded expeditiously. In case, the petitioner's name is cleared from the disciplinary proceeding, the respondents shall consider her case for being promoted as DPE subject to her eligibility and qualification.

(Copy of the judgement is attached as annexure "Q").

17. That, Section Officer (LIT - II) of the KP Elementary and Secondary Education Department sought guidance of the Section Officer (Opinion-I) of the Law Department, Govt. of Khyber Pakhtunkhwa on implementation of the apex court's judgement vide letter NO.SO (Lit-II) E&SED/1-3/SA # 885-A/15/Munazza Khatoon SPET dated Peshawar, the 20.10.2020.

(Copy of the letter of SO-Lit II is attached as annexures "R").

18. That, the Section Officer (Opinion-I) of the Law Department, Govt. of Khyber Pakhtunkhwa replied vide letter NO.SO(OP-I)/LD/5-6/2012-

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VOL-VII/11236-38 dated Peshawar 11.11.2020. He opined that the Honourable Supreme Court has directed vide its judgment dated 18.10.2019 passed in CP NO 4813/2017 that the disciplinary proceedings, if any, which the respondents want to take against the petitioner, be conducted and concluded expeditiously. In case, the petitioner is clear from the disciplinary proceedings then her case may be considered for promotion subject to eligibility and qualification.

(Copy of the letter of SO-Opinion-I is attached as annexures "S").

19. That, the respondent No. 05, responded to the query raised by Assistant Director (Lit-II), KPESE Department vide letter no: 1278/AD(lit:II) dated 01.12.2020. Respondent No. 05 clearly mentioned in her written reply vide Endst: No 2014 (A to D) dated 03-02-2021 that no disciplinary proceeding is pending against the appellant as her office's record and the case may be proceeded as per rule.

(Copy of the written reply of Respondent No. 5 is attached as "T")

20. That, the allegation imposed by respondents upon the appellant was proved as malicious upon admission of respondent No. 05.

21. That, the appellant approached respondent No.1 through proper channel with request for implementation of the order of the apex court but having no response filed departmental appeal before respondent No. 5 on 28.06.2021 which was also not responded hence, this appeal is being preferred before this Honorable Tribunal.

(Copy of the departmental appeal for execution and relevant letters are attached as annexures "U").

GROUND:-

- A) That, the appellant, a resident of district Mansehra, is qualified M.Sc in Health and Physical Education and school teaching the subject of Physical Education to the Higher Secondary Classes with effect from 01.10.2012.
- B) That, the appellant is entitled to be absorbed/ appointed as DPE/IPE with all benefits attached to the said

post with effect from the date of teaching the subject of Physical Education to the Higher Secondary Classes.

- C) That, as per law, the appellant is also eligible to be appointed/promoted as DPE/IPE in the respondents' department.

(Copy of the policy on appointment and promotion is attached as annexure "V").

- D) That, the male teachers have been promoted even in Grade-19 while female teachers could only have got promotion till Grade-17 which is a gross discrimination. Female should also be promoted in the same dates and manner as for the male teachers inspite of the fact that the criteria for the both male and female teachers is the same. Such act of respondents is itself discriminating females of their rights purely on the basis of gender.

- E) That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per precedent case law decided by Honourable KP Service Tribunal

Peshawar, the appellant is also entitled to be absorbed as DPE/IPE in BPS-17 on the analogy of judgments of this Honourable tribunal.

- F) That, once a point of law is decided by Service Tribunal or the August Supreme Court of Pakistan in a particular case that must be made applicable to all the employees who are similarly placed vide judgement of August Supreme Court of Pakistan. Hence the appellant is entitled for absorption in BPS-17 as DPE/IPE against any vacant post.
- G) That, all these facts clearly suggest that the respondents are making the appellant a scapegoat for the reasons unknown to the appellant.
- H) That, there is no other prompt and efficacious remedy available to the appellant except the invocation of Constitutional Jurisdiction of this Honourable Tribunal.
- I) That, appellant reserves the right to raise any other ground available at the time arguments.


PRAYER: -

That in the light of above mentioned fact and circumstances, it is humbly prayed that on acceptance of instant service appeal, respondents may graciously be directed to absorb/ appoint the appellant as DPE/IPE as known as IPE with effect from the date of teaching higher secondary classes i.e., 01.10.2012 and graded pay BPS-17 for additional charge may also be allowed with all service back benefits..


Dated 27.10.2021


MST. MUNAZZA KHATOON
(Appellant)

Through:-


MUNIR HUSSAIN LUGHMANI
ADVOCATE Supreme Court
Of Pakistan

&


MUHAMMAD SAQIB LUGHMANI
ADVOCATE High Courts
Mansehra

VERIFICATION

I, MUNAZZA KHATOON DAUGHTER OF HABIB SHAH, GOVT. GIRLS HIGHER SECONDARY SCHOOL NO. 2 MANSEHRA, DO HEREBY SOLEMNLY AFFIRM AND DECLARE THAT THE CONTENTS OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FORM THIS HONORABLE TRIBUNAL.


MUNAZZA KHATOON
(DEPONENT)

**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CAMP COURT ABBOTTABAD**

Munazza Khatoon.....Appellant

VERSUS

The Govt. of KPK through Secretary
Elementary and Secondary Education
etc.....Respondents

APPEAL

AFFIDAVIT

**I, MUNAZZA KHATOON DAUGHTER OF HABIB SHAH,
GOVT. GIRLS HIGHER SECONDARY SCHOOL NO. 2
MANSEHRA, DO HERBY SOLEMNLY AFFIRM AND
DECLARE ON OATH THAT THE NO SUCH SUBJECT
MATTER APPEAL HAS EVER BEEN FILED BEFORE
THIS HONORABLE COURT NOR PENDING NOR
DECIDED. THAT THE 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 TRIBUNAL.**



**MUNAZZA KHATOON
(DEPONENT)**

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**BEFORE THE HONOURABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CAMP COURT ABBOTTABAD**

Munazza Khatoon.....Appellant

VERSUS

The Govt. of KPK through Secretary
Elementary and Secondary Education
etc.....Respondents

APPEAL

CORRECT ADDRESSES OF THE PARTIES

Correct addresses of the parties are as
below: -


APPELLANT: -

Munazza Khatoon daughter of Habib Shah,
Govt. Girls Higher Secondary School No. 2
Mansehra.

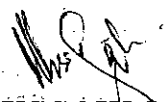
RESPONDENTS: -

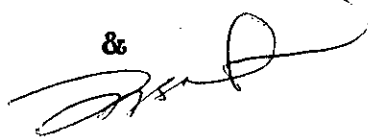
- 1) Government of Khyber Pakhtunkhwa
through Secretary Elementary and
Secondary Education Peshawar.
- 2) Director Elementary and secondary
Education Peshawar.
- 3) District Education officer (Female),
Mansehra.

Dated 27.10.2021


MST. MUNAZZA KHATOON
(Appellant)

Through:-


MUNIR HUSSAIN LUGHMANI
ADVOCATE Supreme Court
Of Pakistan


&
MUHAMMAD SAQIB LUGHMANI
ADVOCATE High Courts
Mansehra

ANNEXURE ^A 16 PET(F)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER


As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following PET (F) (Trained) against vacant posts mentioned against each in BPS-9 @ Rs.3820-230-10720 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

OPEN MERIT

S#	S# in M.List	NAME	FATHER NAME	ADRESS	Place of Posting	Remarks
1	1	SHAZIA KHALID	KHALID MEHMOOD	KHAWARI	GGMS LTHAKRAL	AV Post
2	2	SHAKEELA BIBI	MUHD SULEMAN	DADAR	GGMS DADAR	---do---
3	3	TABBSUM BIBI	JEHAN ZEB KHAN	BATKARAR	GGMS SANGAR	---do---
4	4	ALIA TABBASUM	PERVEZ IQBAL	BAFFA	GGMS MALKAN	---do---
6	6	IRUM KHAN	MUHD MISKEEN KHAN	BAMPHORA	GGHS KAWAI	---do---
5	5	TOSHEEBA SHAH	SHAH MUHAMMAD	MUFTIABAD	GGMS HASSARI	---do---
7	7	ASIA ZEB	AURANG ZEB	MALIK PUR	GGMS CHAMYAL	---do---
8	8	FOZIA BIBI	MUHD YOUNIS	MANSEHRA	GGMS SAWAN MERA	---do---

BATCH-WISE

S#	S# in M.List	NAME	FATHER NAME	ADRESS	Place of Posting	Remarks
1	1	AMBER JABEEN	MUHD AJOON KHAN	KHARAR MERA	GGMS NARA DOGA	AV Post
2	2	TAMANA BIBI	R.MUHD SAFDAR	BEHALI	GGMS BAI BALA	---do---
3	3	IRUM SHAHZADI	MUHD NAZIR	BAFFA	GGMS DHARYAL	---do---
4	4	SHREEN GUL	BABU FAZAL DAD	BAFFA	GGMS TANDA	---do---
5	5	MUNAZA KHATOON	HABIB SHAH	MANSEHRA	GGMS MERA AMJAD ALI	---do---
6	6	SHAGUFTA SHAHEEN	HAYAT KHAN	SOKAR	GGMS JISGRAN	---do---
7	7	SADIA NAZ	SARWAR REHMAN	GULIBAGH	GGMS AHL	---do---
8	8	SITARA JABEEN	SARFRAZ	GANDHIAN	GGMS ICHRIAN	---do---
9	9	MEHNAZ	AURANG ZEB	BELA MUTRIAN	GGMS AGLA GRAN	---do---
10	10	BUSHRA AZIZ	AZIZ MUHAMMAD	THAKAR MERA	GGHS PERHINNA	---do---
11	11	SAMAVIA JEHANZEB	JEHAN ZEB	MUTRIAN	GGMS MANDA GUCHA	---do---
12	12	IRUM SHAHEEN	AURANG ZEB	DATTA	GGMS KANDAR	---do---
13	13	BIBI SOMIA	ABDUR RASHEED	KHAWARI	GGMS GHANOOL	---do---


H20

ANNEXURE ^B 19

32 Annex B

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION MANSEHRA

ADJUSTMENT/Transfer.

As approved by the competent authority the following PET(F) are hereby ordered on their own pay and grade in the interest of public service.

S.No	Name/Design/School	To	Remarks
1.	Manaz Khatoon PET GGMS M.A.Ali.	GGHS No 2 Mansehra.	Vice No 2.
2.	Muniat Shabeer PET GGHS No 2 Mansehra	GGHS No 1 Mansehra.	Vice No 3
3.	Iffhat Jabeen PET GGHS No 1 Mansehra.		Who has been selected as ADO(F)

NOTE:- Order should be implement w.e.f the dated of promotion of Mst:Iffhat Jabeen PET as ADO(F)

- 2. Charge report should be submitted to all concerned.
- 3. No TA/DA is allowed.

Sd-
EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION MANSEHRA.

Endst: No 17522-26 /AE-II/Transfer/Dated 7/12 /2010.

Copy to the:-

- 1. District Accounts Officer Mansehra.
- 2. Principal GGHS No 1 Mansehra.
- 3-4. Headmistress GGHS No 2 Mansehra/GGMS M.A.Ali.
- 5. Teacher concerned.

[Signature]
DISTRICT OFFICER (FEMALE)
(E&S) EDUCATION MANSEHRA.

A tested
[Signature]
Muhammad Arshad Khan Tania
4/6/2010

(20)

BETTER COPY

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S)
EDUCATION MANSEHRA

ADJUSTMENT/TRANSFER

As approved by the competent authority the following PET(F) are hereby ordered on their own pay are ordered in the interest of public service.

S#	Name/Desg/School	To
1	Munaza Khatoon PET, GGMS M.A. Ali	GGHS No. 2, Vice No. 2. Mansehra
2.	Nusrat Shaheen, PET, GGHS No. 2 Mansehra	GGHS No. 1, Vice No. 3 Mansehra
3.	Iffhat Jabeen, PET, GGHS No. 1, Mansehra	She has been selected as ADO(F)

- NOTE: - Order should be implement w.e.f the dated of promotion of Mst. Iffhat Jabeen PET as ADO(F)
2. Charge report should be submitted to all concerned.
 3. No TA/DA is allowed.

Sd/--
EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION MANSEHRA

Endst. No. 17522-26/AE-II/Transfer/Dated 07.12.2010

Copy to the: -

1. District Accounts Officer, Mansehra
2. Principal, GGHS No. 1, Mansehra
- 3-4. Headmistress GGHS No. 2 Mansehra/GGFMS M.A. Ali
5. Teacher concerned.

Sd/--
For EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION MANSEHRA

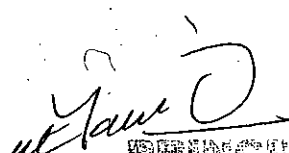
ANNEXURE "D" (24)

PERFORMANCE CERTIFICATE

Certified that Mst. Munnaza Khatoon Senior PET GGHSS No 2 Manshra is placed among the best teacher due to leading the winner team at District and Provincial level in PT, March and Band.

She is also prominent in Teaching Health & Physical Education to Higher Secondary School Classes, achieving 100% result since 01-10-2012.

Dated: 27-02-2019


Retiring Principal
GGHSS No 2 Manshra

(25)

PERFORMANCE CERTIFICATE

It is to certify that Mst. Munazza Khatoon D/O Habib Shah is a regular employee in Education Department as Physical Education Teacher B-15 at Government Girls Higher Secondary School-II Mansehra. She belongs to a respectable family and is a highly qualified Teacher being Master in Health & Physical Education.

Her performance in the field of Education has been prominent as she has been working as D.P.E. from 2012 with 100 percent yearly results from Board of Intermediate & Secondary Education Abbottabad.

Dated the: 8th September, 2016

Munazza Khatoon
PRINCIPAL
GGHSS-II MANSEHRA
Munazza Khatoon

(26)

PERFORMANCE CERTIFICATE

Certified that Mst: Munaza Khatoon D/O Habib Shah has been working in education Department since 01/12/2002. Presently she is working as PET BPS-15, at Government Girls Higher Secondary School No.2 Mansehra.

She belongs to a respectable family of the District and bears good moral character. She is performing her duty to the entire satisfaction of her superior. She is a qualified teacher having her MSc degree in (Health & physical Education).

She is teaching Health & physical Education to 1st year and 2nd year's students and as per BISE Abbottabad, her result in subject of Health & Physical Education is 100% for the Last 2 $\frac{1}{2}$ years. She is committed to her Job and performing the duty punctually, honestly & is considered as highly alert and responsible teacher.

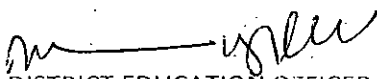


PRINCIPAL,

31-03-15

GOVT: GIRLS HIGHER SECONDARY SCHOOL
NO.2 MANSEHRA

COUNTERSIGNED



DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

District Education Officer
(Female) Mansehra

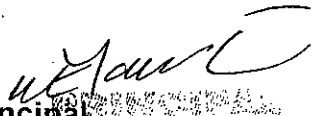
27

RESULT STATEMENT

RESULT STATEMENT FOR THE LAST SIX YEARS IN RESPECT OF

MST. MUNNAZA KHATOON SPET (BPS-16) at GGHSS NO. 2 MANSEHRA
(DISTRICT MANSEHRA).

Year	Subject	Class	Appeared	Pass	Fail	Pass %
2013	HPE	1 st Year	48	48	Nil	100%
2014	HPE	1 st Year	39	39	Nil	100%
	HPE	2 nd Year	48	48	Nil	100%
2015	HPE	1 st Year	21	21	Nil	100%
	HPE	2 nd Year	39	39	Nil	100%
2016	HPE	1 st Year	50	50	Nil	100%
	HPE	2 nd Year	21	21	Nil	100%
2017	HPE	1 st Year	36	36	Nil	100%
	HPE	2 nd Year	50	50	Nil	100%
2018	HPE	1 st Year	36	36	Nil	100%


Principal
GGHSS No. 2
Mansehra

E.
ANNEXURE 28
TIME TABLE GGHSS NO. 2 MANSEHRA

35

Name of Teacher: Munnaza Khatoon PET Year: 2012 - 2013

Days	1 st	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday	STU Eng	HPE 1st Year		P.T. 6th A		-		P.T. 7th B	P.T. 6th B
Tuesday	- // -	- // -		- // -		-		- // -	P.T. 8th A
Wednesday	- // -	- // -			P.T. 8th B	-		P.T. 10th A	- // -
Thursday	- // -	- // -			- // -	-		- // -	P.T. 9th B
Friday	- // -	- // -			P.T. 9th A	-	Half Day		
Saturday	- // -	- // -			P.T. 9th A	-		P.T. 6th B	P.T. 9th B

Munnaza Khatoon
Principal
GGHSS No. 2
Mansehra

TIME TABLE GGHSS NO. 2 MANSEHRA

Name of Teacher: Munnaza Khatoon PET Year: 2013 - 2014

Days	1 st	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday		HPE 2nd year		HPE 1st year	P.T. 7th A	-	P.T. 8th B		P.T. 10th C
Tuesday		//		//	P.T. 7th B	-	//	P.T. 9th B	//
Wednesday		//		//		-	P.T. 7th A	//	P.T. 10th A
Thursday		//		//		-	//	P.T. 8th C	//
Friday		//		//		-	Half Day		
Saturday		//		//		-	P.T. 6th C	//	

Munnaza Khatoon
Principal
GGHSS No. 2
Mansehra

TIME TABLE GGHSS NO. 2 MANSEHRA

Name of Teacher: Munnaza Khatoon PET Year: 2014 - 2015

Days	1 st	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday		HPE 2 nd year		HPE 1 st year	PT 6 th A	-	P.T 8 th A	P.T 10 th B	P.T 9 th A
Tuesday		//		//	//	-	//		//
Wednesday		//		//	PT 6 th B	-	PT 8 th B		P.T 10 th C
Thursday		//		//	//	-	P.T 8 th B		//
Friday		//		//	PT 6 th C	-	Half Day		
Saturday		//		//	//	-	P.T 10 th B		

Munnaza Khatoon
 Principal
 GGHSS No. 2
 Mansehra

TIME TABLE GGHSS NO. 2 MANSEHRA

Teacher Name: Munnaza Khatoon (PET) Year: 2015 - 2016

Days	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday	HPE 1 st year		HPE 2 nd year	P.T 6 th A	-	P.T 9 th A	P.T 10 th A	
Tuesday	//		//	//	-	//	//	
Wednesday	//		//	P.T 8 th B	-	P.T 9 th C	P.T 10 th B	P.T 8 th C
Thursday	//		//	//	-	//	//	//
Friday	//		//	P.T 9 th C	-	P.T 7 th B	Half Day	
Saturday	//		//	//	-	//		

Munnaza Khatoon
 Principal
 GGHSS No. 2
 Mansehra

TIME TABLE GGHSS NO. 2 MANSEHRA

Teacher Name: Munnaza Khatoon PET Year: 2016-2017

Days	1 st	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday		HPE 1st Year	P.T 8th A	HPE 2nd Year		—	P.T 10th B		
Tuesday		//	//	//		—	P.T 6th C	P.T 7th B	P.T 10th B
Wednesday		//		//		—	P.T 10th C		P.T 9th C
Thursday		//		//		—	P.T 6th C	P.T 9th B	//
Friday		//	P.T 7th A	//		—	Half Day		
Saturday		//	//	//		—	P.T 10th A	P.T 9th B	

M. Jall
Principal
GGHSS No. 2
Mansehra

TIME TABLE GGHSS NO. 2 MANSEHRA

Name of Teacher: Munnaza Khatoon SPET Year: 2017-2018

Days	1 st	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday		P.T 8th B	P.T 7th A	HPE 1st Year	P.T 6th A	—	P.T 10th B		P.T 10th A
Tuesday		//	//	//	//	—	//	P.T 7th B	P.T 10th A
Wednesday				//	P.T 10th C	—	P.T 6th C	//	P.T 9th C
Thursday		P.T 7th C	P.T 10th A	//		—	//		//
Friday		//		//		—	Half Day		
Saturday				//	P.T 10th A				P.T 10th C

M. Jall
Principal
GGHSS No. 2
Mansehra

(31)

TIME TABLE GGHSS NO. 2 MANSEHRA

Teacher Name: Munnaza Khatoon SPET Year: 2018 - 2019

Days	1 st	2 nd	3 rd	4 th	5 th	Break	6 th	7 th	8 th
Monday		HPE 1st year	P.T 8th A		P.T 8th B	—	P.T 10th B	P.T 9th B	
Tuesday		//	//	P.T 7th B	//	—	P.T 6th C	P.T 7th B	P.T 10th B
Wednesday		//	P.T 7th A	//		—	//	//	P.T 9th C
Thursday		//	//	P.T 6th A	P.T 8th C	—	P.T 9th A		//
Friday		//		//	//	—	Half Day		
Saturday		//				—		P.T 9th B	P.T 9th A

Munnaza Khatoon
Principal
GGHSS No. 2
Mansehra

ANNEXURE

32

ہم اپنے اساتذہ کی عظمت کو سلام پیش کرتے ہیں

Elementary & Secondary Education Department Mansehra



Best Teacher Certificate

Miss. MUNAZA KHATOON Desig: PET

S.O.2 MANSEHRA in recognition of his/

for the Education Department specially for uplifting of the
Education in the District Mansehra on the occasion of

"Salam Teacher Day"

5th Oct, 2011

Khan Muhammad

District Officer (Male)
E&SE Mansehra

District Officer
Elementary & Secondary
Education Mansehra

Umar Khan Kundi

Executive District Officer
E&SE Mansehra

EXECUTIVE DISTRICT OFFICER
ELEM. & SECY. EDU. MANSEHRA

اساتذہ کی عظمت کو سلام

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT MANSEHRA



BEST PERFORMANCE CERTIFICATE

Is awarded to Mr. Mst:

Murmuza P.E.T School

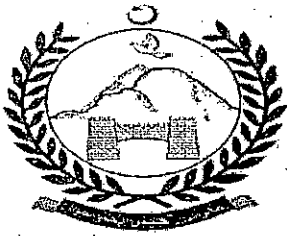
GGHSS No 2

in recognition of his / her best performance on the basis of Annual School Performance Evaluation December 2011 as well as his/ her services for the District Education Department in uplifting of the quality Education in Govt Schools of District Mansehra.

On The Occasion Of
SALAM TEACHER DAY
05 OCTOBER 2012

District Officer (M / F)
E&SE Mansehra

Executive District Officer
E&SE Mansehra



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,

9210437, 9210957, 9210468

Fax 091-9210936, 0800-33857

E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female PETs B-15 are hereby promoted to the post of Female Senior PET BPS-16 (Rs. 15880-1280-54280) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior PET BPS-16 posts:-

Total No. of PET (F) Posts duly verified by the DAO						111
1/3 share of Senior PET Posts						37
Share of promotion 100 %						37
Already promoted to the post of SPET B-16						34
Posts available for promotion						05
Promoted to the post of SPET B-16						04
S.No.	Sn. No.	Name of Official	Name of School	Date of Birth	Date of Appointt; as Regular PET	Remarks
1	10	Nazish Jabeen	GGMS Khushala	01-09-1982	01-02-2009	Services placed at the disposal of DEO (F) Mansehra for further posting.
2	12	Munazza Khatoon	GGHS No.2 Mansehra	25-03-1976	05-05-2009	Services placed at the disposal of DEO (F) Mansehra for further posting.
3	13	Shagufta Shaheen	GGHS Ghanool	03-06-1976	05-05-2009	Services placed at the disposal of DEO (F) Mansehra for further posting.
4	16	Naveed Akhter	GGMS Eidgah	20-2-1980	05-05-2009	Services placed at the disposal of DEO (F) Mansehra for further posting.

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he/she is wrongly promoted he/She will be reversed.
8. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

(35)

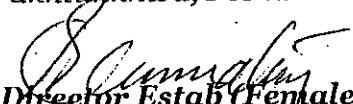
PET (F) Mansehra 3

Endst: No. 5441/45 /File No.2/Promotion (F) Senior PET B-16/Mansehra

Dated Peshawar the 16/2 /2017

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (F) Mansehra
3. District Accounts Officer Mansehra
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File


Dy: Director Estab (Female)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

/Noor/17/

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

ADJUSTMENT

In pursuance to the Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar vide Endstt: No. 5441-45/F.No. 02/Promotion (F) Senior PET B-16/Mansehra Dated Peshawar the:16/02/2016 ,(04) Female PET is promoted to the post of Senior PET BPS 16 @ Rs: 15880-1280-54280 plus usual allowances as admissible under the rules on regular basis under the existing recruitment policy on the terms and conditions given below as hereby adjusted against the stations noted against name with immediate effect.

s#	Teacher's Name	Present School	Place of posting against SPET Post	Remarks
1	Nazish Jabeen	GGMS Khushala	GGHS Bherkund	Against V/Post
2	Munazza Khatoon	GGHSS No2 Mansehra	GGHSS No.2 Mansehra	Post already occupied
3	Shughfta Shaheen	GGHS-Ghanool	GGHS Ghanool	.do.
4	Naveed Akhtar	GGMS Eidgah	GGHSS Baffa	.do.

CONSEQUENTIAL ORDER

1	Fazila Hassan PET	GGHSS GHULLah	GGMS Khushala	Vice S. No.1
2	Alia Tabasum PET	GGHSS Baffa	GGMS Eidgah	Vice S. No. 4

TERMS & CONDITIONS:

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt:.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned within fifteen days.
5. Their Inter-Se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst: No. 135865 /Estt: Branch/AE-I/Promotion File PET Dated 25/2/2017 /2017

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar.
2. District Nazim Mansehra.
3. Deputy Commissioner Mansehra.
4. District Account Officer Mansehra.
5. Principals/Head Mistress concerned schools.
6. B&AO local office.
7. Teachers Concerned.
8. Office Copy.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

25/2/17

107
H.
ANNEXURE

37

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY EDUCATION
MANSEHRA

No. 2701-03
Dated: 2/11/2012

OFFICE ORDER

During the surprise visit at GGHSS NO. 02 Mansehra, an issue was brought into the notice of undersigned.

The students of Higher Secondary classes in the subject of Physical Education are suffering as the post of DPE is lying vacant since its sanction.

To resolve this issue Mst. Munaza Khatoon PET (BPS-15) of GGHSS NO. 02 Mansehra is hereby directed to teach the subject of Physical Education at Higher Secondary classes / level as DPE (being qualified) till further order.

-----Sd-----
EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION MANSEHRA

Copy of the: -

1. Principal GGHSS No. 02 Mansehra
2. Teacher concerned
3. Office file.

Munaza Khatoon

Muhammad Arshad Khan Tanoli
Advocate
District Courts Abbottabad

Munaza Khatoon
EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION MANSEHRA

ڈائریکٹر خانیپور فائبر پرائیویٹ لیڈر (۵) شاہراہ

۱۰۰۰۰۰۰۰

ANNEXURE (38)

بجاریت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ (زنانہ) محکمہ تعلیم مانسہرہ



اپیل بمبر او DPE پوسٹ

عنوان:

جناب عالیہ!

مودبانہ گزارش یکہ سالہ آرڈر نمبر 7736-7801 تاریخ 2002-11-28 کو محکمہ تعلیم میں بحیثیت PTC تعینات ہوئی تھی اور اپنا چارج 01-12-2002 کو لیا۔

بعد ازاں میرا آرڈر PET پوسٹ پر آرڈر نمبر 66-6724 مورخہ 04-05-2009 کو گورنمنٹ گرلز ہائی اسکول میرا ایجوکیشن میں ہوا۔

جناب عالیہ! ای ڈی او صاحبہ اضلع مانسہرہ کے حکم نمبر 26-17522 مورخہ 07-12-2010 کے تحت میرا تبادلہ گورنمنٹ گرلز ہائی اسکول میرا ایجوکیشن سے گورنمنٹ گرلز ہائی اسکول نمبر 02 مانسہرہ میں ہوا۔

جب میرا تبادلہ گورنمنٹ گرلز ہائی اسکول نمبر 02 مانسہرہ میں ہوا تو بعد میں مذکورہ اسکول ہائیر سیکنڈری ہو گیا اور فرسٹ ایئر کی کلاس بھی شروع ہوئی فرسٹ ایئر کی فیزیکل ایجوکیشن پڑھانے کے لئے DPE تعینات نہیں کی گئی اس وقت سے لے کر آج تک میں فرسٹ ایئر اور سیکنڈ ایئر کو DPE کے مضامین یعنی فیزیکل ایجوکیشن پڑھا رہی ہوں فیزیکل ایجوکیشن کے مضامین پڑھاتے ہوئے مجھے دو سال سے بھی زائد کا عرصہ ہو چکا ہے میرا ان دو سالوں کا بورڈ کا

ریزلٹ بھی بہتر رہا ہے۔

سالہ DPE کی جملہ کوالیفیکیشن یعنی فیزیکل ایجوکیشن میں M.Sc کی ہوئی ہے اور DPE کے جملہ مضامین بھی پڑھا رہی ہے اور سالہ ہر لحاظ سے DPE پوسٹ پر سکیل 17 میں ترقی کی حقدارہ ہے۔

یہ کہ سالہ عرصہ دو سال DPE پوسٹ پر کام کر رہی ہے اور ان دو سالوں کا سو فیصد ریزلٹ سالہ کی پیشہ ورانہ مہارت اور محنت کا منہ بولتا ثبوت ہے۔

جناب عالیہ! سالہ کو گزشتہ دو سال سے DPE پوسٹ پر سکیل 17 کے مراعات سے محروم رکھا گیا ہے جبکہ سالہ کی تعلیمی قابلیت اور اس پوسٹ کے لئے دیگر لوازمات پوسٹ کے مطلوبہ معیار کے عین مطابق ہیں۔

لہذا استدعا ہے کہ سالہ کو DPE پوسٹ پر باقاعدہ سکیل 17 میں بمعہ مراعات Appionت کرنے کا حکم صادر فرمایا جائے اور سالہ کو اسی پوسٹ پر اسی اسکول میں ترقی دی جائے۔

عین نوادش ہوگی۔

المقوم: 12 اکتوبر 2014ء

منزہ خاتون ای ڈی او گورنمنٹ گرلز ہائی اسکول سیکنڈری سکول نمبر 2 مانسہرہ

Muhammad Aishad Khan Farahi
Advocate
Distt. Courts (Manshera)

خدمت جناب سیکرٹری صاحب ایلمنٹری اینڈ سیکنڈری ایجوکیشن صوبہ خیبر پختونخواہ پشاور
عنوان:- حکمانہ اپیل

جناب عالی!

۱- مکتوبانہ گزارش ہے کہ سائلہ حکم نمبری 7736-7801 بتاریخ 28.11.2002 کو محکمہ تعلیم میں بحیثیت PTC تعینات ہوئی تھی اور سائلہ نے 01.12.2002 کو اپنا چارج لیا۔ (آرڈر لف ہے)۔

۲- یہ کہ محکمہ تعلیم کے مجاز افسر صاحب نے بذریعہ حکم نمبری 66-6724 مورخہ 04.05.2009 کو سائلہ کا PET پوسٹ پر تعیناتی کا حکم جاری کیا اور گورنمنٹ گرلز مڈل سکول میرا امجد علی میں بطور PET تعینات کر دیا۔ (آرڈر لف ہے)۔

۳- یہ کہ محکمہ تعلیم کے مجاز افسر نے سائلہ کو بذریعہ حکم نمبری 26-17522 مورخہ 07.12.2010 کو گرلز مڈل سکول میرا امجد علی سے گورنمنٹ گرلز ہائی سکول نمبر 02 مانسہرہ میں ٹرانسفر کر دیا۔ (آرڈر لف ہے)۔

۴- جناب والا! یہاں یہ امر قابل ذکر ہے کہ سائلہ کو جب گورنمنٹ گرلز ہائی سکول نمبر 02 مانسہرہ میں تعینات کیا گیا تو بعد میں مذکورہ ہائر سیکنڈری ہو گیا اور اس میں DPE کی پوسٹ بھی منظور ہوئی لیکن اس پوسٹ پر DPE کی تعیناتی نہیں کی گئی بلکہ سائلہ کو ایگزیکٹو ڈسٹرکٹ آفیسر ایجوکیشن مانسہرہ کے حکم کے تحت ہائر سیکنڈری کلاسز کو ہیلتھ اینڈ فزیکل ایجوکیشن بطور DPE پڑھانے کا حکم صادر ہوا اور سائلہ عرصہ (2-1/4) سو دو سال سے DPE کے مضامین یعنی فزیکل ایجوکیشن پڑھا رہی ہے اور سائلہ کا ریزلٹ بھی بہترین آ رہا ہے جس کا واضح ثبوت موجود ہے۔ (اس حوالے سے ایگزیکٹو ڈسٹرکٹ آفیسر ایجوکیشن مانسہرہ کا حکم لف ہے)۔

۵- یہ کہ سائلہ نے DPE کی جملہ کوالیفیکیشن یعنی M.Sc Health & Physical کی تعلیم حاصل کر رکھی ہے اور DPE کے جملہ مضامین بھی پڑھا رہی ہے اور سائلہ ہر لحاظ سے DPE پوسٹ پر سکیل 17 کی حقدار ہے لیکن DEO (Female) مانسہرہ نے DPE پوسٹ پر تعیناتی کے بجائے سائلہ کو PET پوسٹ پر ہی رکھا ہوا ہے جو کہ حکم افسر مجاز غیر قانونی وغیر معنی ہونے کے ساتھ ساتھ حکومت کی پالیسیوں اور نوٹیفیکیشنز کی بھی خلاف ورزی ہے جبکہ

(40)

(1)

سائلہ نے اس نسبت DEO(Female) مانسہرہ کو درخواست دے رکھی ہے۔ (نقل درخواست لف ہے)۔

۶۔ یہ کہ سائلہ عرصہ (2-1/4) سوادوسال سے DPE پوسٹ پر کام کر رہی ہے اور ان (2-1/4) سوا دوسالوں کا بہترین ریزلٹ سائلہ کی پیشہ ورانہ مہارت اور محنت کا منہ بولتا ثبوت ہے۔

۷۔ یہ کہ سائلہ کو گزشتہ عرصہ (2-1/4) سوادوسال سے DPE پوسٹ پر سکیل 17 کے مراعات سے محروم رکھا گیا ہے جبکہ سائلہ کی تعلیمی قابلیت اور اس پوسٹ کے لیے دیگر لوازمات پوسٹ کے مطلوبہ معیار کے عین مطابق ہیں۔

۸۔ اس حوالے سے سرورس ٹریبونل کے فیصلہ اپیل نمبر 92/95 محررہ 16.07.1996 کے تحت ایک شخص محمد ریاض کو SET پوسٹ سے بطور Subject Specialist تعینات کیا۔ (فیصلہ لف ہے)۔

لہذا استدعا ہے کہ سائلہ کو DPE پوسٹ پر باقاعدہ سکیل 17 میں بمعہ جملہ مراعات Appoint کرنے کا حکم صادر فرمایا جائے اور سائلہ کو اسی پوسٹ پر اسی سکول میں ترقی دی جائے۔ تا فیصلہ اپیل کسی بھی طرح سے گورنمنٹ گزٹ ہائیر سیکنڈری سکول نمبر 02 مانسہرہ میں DPE کی تعیناتی نہ فرمائی جاوے۔

کامیاب
المرقوم 02-4-2005

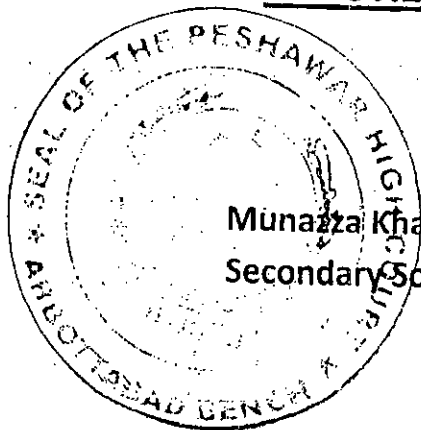
المرقوم

منزہ خاتون PET گورنمنٹ گزٹ ہائیر سیکنڈری سکول نمبر 02 مانسہرہ

Attested
Muhammad Aslam Khan Tanoli
Advocate
Dist: Courts Abbottabad

„J“
ANNEXURE (41)

BEFORE THE PESHAWAR HIGH COURT
BENCH ABBOTTABAD



Munazza Khatoon D/O Habib Shah Govt. Girls Higher
Secondary School No 2 Mansehra

wp 678/15
.....Petitioner

VERSUS

1. Secretary Education Elementary and Secondary Education KPK Peshawar.
2. Director Elementary and Secondary Education, KPK Peshawar.
3. District Education Officer (Female) Mansehra.

.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN 1973 FOR DECLARATION TO
BE EFFECT THAT THE PETITIONER IS A PET
(PHYSICAL EDUCATION TEACHER) BUT AS
PER DIRECTION BY THE COMPETENT
AUTHORITY TO THE PETITIONER TO TEACH
THE SUBJECT OF PHYSICAL EDUCATION AS
DPE TO THE HIGHER SECONDARY CLASSES
IN THE SCHOOL VIDE ORDER NO 2701-03
DATED 1.10.2012. THE PETITIONER IS
TEACHING AS DPE TO HIGHER SECONDARY
CLASSES (BEING QUALIFIED) IN THE
SCHOOL SINCE 1.10.2012 TO TILL DATE BUT
RESPONDENTS' DEPARTMENT DID NOT
PERMANENTLY ABSORBED THE
PETITIONER AS DPE WHICH IS AGAINST
THE LAW, PERVERSE, DISCRIMINATORY,
MALAFIDE AND NOT MAINTAINABLE

2774
03-06-15
Certified to be True Copy
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordms

FILED TODAY

Additional Registrar
Peshawar High Court
Abbottabad Bench



UNDER THE LAW AS WELL AS AGAINST
PRECEDENT CASE LAW REPORTED 2009
SCMR -1.

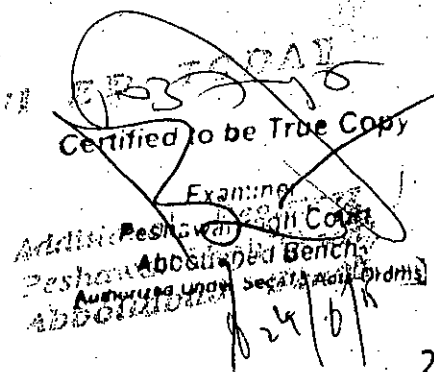
Prayer:

ON ACCEPTANCE OF INSTANT WRIT
PETITION RESPONDENTS' DEPARTMENT
MAY GRACIOUSLY BE DIRECTED TO
ABSORB/APPOINT THE PETITIONER AS
DPE AGAINST THE VACANT POST IN THE
SAID SCHOOL WITH EFFECT FROM DATE
OF TEACHING HIGHER SECONDARY
CLASSES I.E .1.10.2012 AND 20% PAY
FOR ADDITIONAL CHARGE MAY ALSO BE
GRANTED ON THE ANALOGY OF A
SIMILAR CASE TITLE MUHAMMAD RIAZ
VS GOVT. OF KPK & OTHERS DECIDED
BY KPK SERVICE TRIBUNAL IN APPEAL
NO 92/95 DATED 16.9.1996 WITH ALL
SERVICE BACK BENEFIT.

NO 2774
24-6-15

Respectfully Sheweth,

1. That, the petitioner was appointed as (PET) Physical Education Teacher in BPS-15 on 4.5.2009. The petitioner was thereafter posted at Govt. Girls High School Mansehra vide order No 17522 -26 dated 7.12.2010. Copies of appointment order and transfer order are attached as annexure "A" & "B"
2. That, the petitioner is qualified as M. Sc Health & Physical Education and having 3 year teaching experience against the post of DPE (BPS-15)



 Certified to be True Copy

 Examined by

 Additional Peshawar Bench

 Peshawar Bench

 24/6/15

Copies of degrees & experience Certificate are attached as annexure "C" & "D".

3. That the petitioner is teaching the subject of Physical Education to the Higher Secondary Classes with complete devotion and dedication. The petitioner is dedicated teacher and earned best teacher Certificate on Salam Teacher Day dated 5.10.2011. Copy of best teacher award is annexed as Annexure "E"
4. That, a post of DPE (BPS-17) is lying vacant in the said School. That during surprise visit of respondent No 3 in Govt. Girls Higher Secondary School Mansehra, the petitioner was directed by the competent authority to teach the subject of Physical Education to Higher Secondary Classes vide order No 2701-03-1.10.2012. Copy of letter of Respondent No 3 is attached as annexure "F".
5. That, the petitioner is serving/teaching the subject of Physical Education being qualified to the Higher Secondary Classes on the directive of Respondent NO 3 with effect from 1.10.2012. Respondents' Department neither paid extra 20% of pay for additional charge nor absorb/appoint the petitioner as DPE against the vacant post in the said School since 1.10.2012.
6. That, the petitioner feeling aggrieved, filed Departmental appeal to respondent No 3 for redressal of her grievances but the respondent department bother to reply to the petitioner. Copy of appeal is attached as annexure "G". Hence the instant writ petition is filed inter-alia on the following grounds

GROUND

- I. That the petitioner is qualified M.Sc in Health and Physical Education and she is teaching the subject of Physical Education

Writ Petition

Additional Registrar
Peshawar High Court
Abbottabad Bench

Certified to be true copy
03/10/12
Examiner
Peshawar High Court
Abbottabad Bench
Authorized under Section 10(1)(b)



to the Higher Secondary Classes with effect from 1.10.2012. It is submitted that a post of DPE (PBS-17) is lying vacant in the School since 2012 to till date. Hence the petitioner is entitled to be absorbed/appointed as DPE with all benefits attached to the said post with effect from the date of teaching the subject of physical education to the Higher Secondary Classes.

II. That as per Law, petitioner is also eligible to be appointed/promoted as DPE in the respondents' Department. In this regard, the policy on appointment and promotion is attached as annexure "H".

III. That when Law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per precedent case law decided by KPK Service Tribunal titled Muhammad Riaz VS Govt. of KPK appeal No 92/95 dated 16.7.1996 almost in a similar case granted the benefit of BPS-17 as subject Specialist to the appellant. Therefore the petitioner is also entitled to be absorb as DPE in (BPS-17) on the analogy of judgment of KPK Service Tribunal. Copy of Judgment of Service Tribunal is attached as Annexure "I".

IV. That, once a point of Law is decided by Service Tribunal or the August Supreme Court of Pakistan in a particular case that must be made applicable to all the employees who are similarly placed vide judgment of August Supreme Court of Pakistan reported 2009 SCMR -1. Hence the petitioner is entitled for absorption in BPS 17 as DPE against vacant post in the said School.

Certified to be True Copy
Resnowal Court
Accountant
Alhamdulillah

(45)



V. That there is no prompt and efficacious remedy available to the petitioner except the invocation of Constitutional Jurisdiction of this Honourable Court.

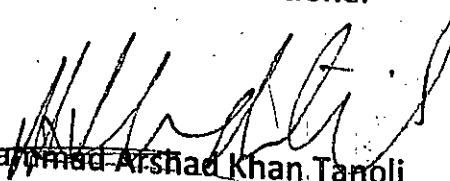
VI. Court Fee attached Rs. 500/-

It is, therefore, prayed that On acceptance of instant writ Petition respondents' department may graciously be directed to absorb/appoint the petitioner as DPE against the vacant post in the said school with effect from date of teaching Higher Secondary Classes i.e .1.10.2012 and 20% pay for additional charge may also be granted on the analogy of a similar case title Muhammad Riaz VS Govt. of KPK & others decided by KPK Service Tribunal in Appeal No 92/95 dated 16.9.1996 with all service back benefit.

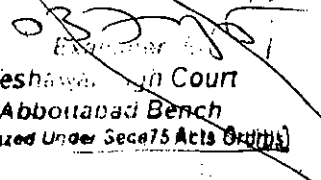
Dated:-----/2015

Petitioner

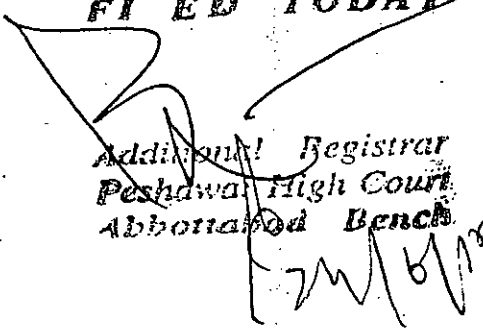
Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

Certified to be True Copy


Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordinance

FILED TODAY

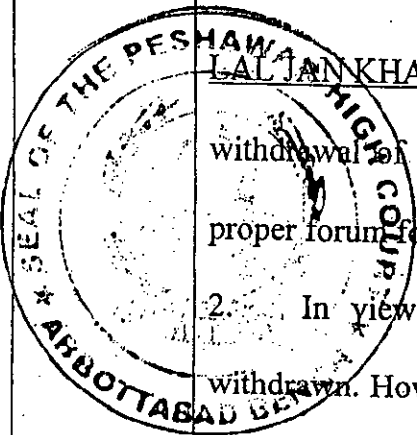

Additional Registrar
Peshawar High Court
Abbottabad Bench

Riela

ANNEXURE "K" 46

PESHAWAR HIGH COURT ABBOTTABAD BENCH
FORM 'A'
FORM OF ORDER SHEET

12

Date 1	Order of the Court with signature of Honourable Judge (s) 2
<p>25.6.15</p>  <p>Certified to be True Copy Examiner Peshawar High Court Abbottabad Bench Authorized Under Sec 275 Acts Ordms</p>	<p>WP No. 678-A/2015</p> <p>Present: Mr. Muhammad Arshad Tanoli advocate for the petitioner.</p> <p>*****</p> <p>LAL JANKHATTAK J. Learned counsel for the petitioner seeks withdrawal of the instant writ petition in order to seek remedy from the proper forum for redressal of the petitioner's grievance.</p> <p>2. In view of the above, the instant writ petition is dismissed as withdrawn. However, petitioner would be at liberty to seek her remedy from the proper for the redressal of her grievance, if any.</p> <p style="text-align: right;">SD / JUDGES</p>

ANNEXURE "L" (47)

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 885 /2015

Munazza Khatoon daughter of Habib Shah, Govt. Girls Higher Secondary School
No. 2, Mansehra.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Education Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
1. District Education Officer (Female), Mansehra.

....RESPONDENTS

SERVICE APPEAL

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT 1974, FOR THE
DECLARATION TO THE EFFECT THAT THE
APPELLANT IS A PET (PHYSICAL EDUCATION
TEACHER) BUT AS PER DIRECTION BY THE
COMPETENT AUTHORITY TO THE APPELLANT

TO TEACH THE SUBJECT OF PHYSICAL EDUCATION AS DPE TO THE HIGHER SECONDARY CLASSES IN THE SCHOOL VIDE ORDER NO. 2701-03 DATED, 01/10/2012. THE APPELLANT IS TEACHING AS DPE TO HIGHER SECONDARY CLASSES (BEING QUALIFIED) IN THE SCHOOL SINCE 01/10/2012 TO TILL DATE BUT RESPONDENTS' DEPARTMENT NEITHER PERMANENTLY ABSORBED AS DPE, NOR MAKE PAYMENT OF ADDITIONAL CHARGE TO THE APPELLANT WHICH IS AGAINST THE LAW, PERVERSE, DISCRIMINATORY, MALAFIDE AND NOT MAINTAINABLE UNDER THE LAW AS WELL AS AGAINST PRECEDENT CASE LAW REPORTED 2009 SCMR-1.

PRAYER: ON ACCEPTANCE OF THE INSTANT APPEAL, RESPONDENTS' DEPARTMENT MAY GRACIOUSLY BE DIRECTED TO ABSORB/ APPOINT THE APPELLANT AS DPE AGAINST THE VACANT POST IN THE SAID SCHOOL WITH EFFECT FROM THE DATE OF TEACHING HIGHER SECONDARY CLASSES I.E. 01/10/2012 AND 20% PAY FOR ADDITIONAL CHARGE MAY ALSO BE

GRANTED ON THE ANALOGY OF A SIMILAR CASE TITLE "MUHAMMAD RIAZ V/S GOVT. OF KPK & OTHERS" DECIDED BY SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR IN APPEAL NO. 92/95 DATED 16/09/1996 WITH ALL SERVICE BACK BENEFIT.

Respectfully Sheweth: -

Following are the facts, giving rise to the instant appeal:-

1. That the appellant was appointed as (PET) Physical Education Teacher in BPS-15 on 04/05/2009. The appellant was thereafter posted at Govt. Girls High School, Mansehra vide order No. 17522-26 dated 07/12/2010. Copies of appointment order and transfer order are attached as Annexure "A" & "B".
2. That, the appellant is qualified as M.Sc Health and Physical Education and having 3 years teaching experience against the post of DPE (BPS-17).

Copies of degrees and experience certificate are attached as Annexure "C" & "D".

3. That the appellant is teaching the subject of Physical Education to the Higher Secondary Classes with complete devotion and dedication. The appellant is dedicated teacher and earned best teacher certificate on Salam Teachers Day dated 05/10/2011. Copy of best teacher award is annexed as Annexure "E".

4. That a post of DPE (BPS-17) is lying vacant in the said School. That during surprise visit of respondent No. 3 in Govt. Girls Higher Secondary School, Mansehra, the appellant was directed by the competent authority to teach the subject of Physical Education to Higher Secondary Classes vide order No. 2701-03 dated 01/10/2012. Copy of letter of respondent No. 3 is attached as Annexure "F".

5. That the appellant is serving/ teaching the subject of Physical Education being qualified to the Higher Secondary Classes on the directive of respondent No. 3 with effect from 01/10/2012.

(51)

Respondents' Department neither paid extra 20% of pay for additional charge nor absorb/ appoint the appellant as DPE against the vacant post in the said school since 01/10/2012.

6. That the appellant feeling aggrieved filed departmental appeal to the respondent No. 3 for redressal of her grievances but the respondents department bother to reply to the appellant. Copy of appeal is attached as Annexure "G".

7. That the appellant filed writ petition No. 678-A/2015 before the Peshawar High Court, Abbottabad bench. The Honourable High Court directed to the appellant to approach the competent forum vide order dated 25/06/2015. Copies of writ petition and order dated 25/06/2015 is attached as Annexure "H" & "I". Hence the instant appeal is filed, inter-alia, on the following grounds:-

GROUND:-

a. That the appellant is qualified M.Sc in Health & Physical Education and school teaching the subject of Physical Education to

the Higher Secondary Classes with effect from 01/10/2012. It is submitted that a post of DPE (BPS-17) is lying vacant in the School since 2012 to till date. Hence the appellant is entitled to be absorbed/ appointed as DPE with all benefits attached to the said post with effect from the date of teaching the subject of Physical Education to the Higher Secondary Classes.

- b. That as per law, appellant is also eligible to be appointed/ promoted as DPE in the respondents' Department. In this regard, the policy on appointment and promotion is attached as Annexure "J".
- c. That when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per precedent case law decided by Service Tribunal, Khyber Pakhtunkhwa, Peshawar titled "Muhammad Riaz v/s Govt. of KPK" appeal No. 92/95 dated 16/07/1996 almost in a similar case granted the benefit of BPS-17 as Subject Specialist to the

appellant. Therefore the appellant is also entitled to be absorb as DPE in (BPS-17) on the analogy of judgment of Service Tribunal, Khyber Pakhtunkhwa.

d. That once a point of law is decided by Service Tribunal or the August Supreme Court of Pakistan in a particular case that must be made applicable to all the employees who are similarly placed vide judgment of August Supreme Court of Pakistan reported 2009 SCMR-1. Hence the appellant is entitled for absorption in BPS-17 as DPE against vacant post in the said school.

e. That there is no other prompt and efficacious remedy available to the appellant except the invocation of Constitutional Jurisdiction of this Honourable Tribunal.

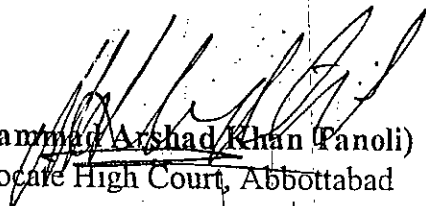
It is, therefore, humbly prayed that on acceptance of the instant appeal, respondents' department may graciously be directed to absorb/ appoint the appellant as

DPE against the vacant post in the said school with effect from the date of Teaching Higher Secondary Classes i.e. 01/10/2012 and 20% pay for additional charge may also be granted on the analogy of a similar case title "Muhammad Riaz v/s Govt. of KPK & others" decided by Service Tribunal Khyber Pakhtunkhwa, Peshawar in appeal No. 92/95 dated 16/09/1996 with all service back benefit.


...APPELLANT

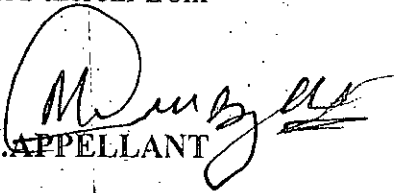
Dated: 5/8 /2015

Through


(Muhammad Arshad Khan Panoli)
Advocate High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT

ANNEXURE^M (SS)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION


The undersigned is pleased to notify the following inquiry committee regarding the matter of Munnaza Khatoon D/O Habib Shah Government Girls Higher Secondary School Mansehra No 02.

S. No	Name and Designation	Nominated as
1	Farkhanda Shaheen HM GGHS Gali Badral	Chairperson
2	Bibi Sabeela SS GGHS Thathi Khurd	Member

The Committee members are directed to find out the facts finding enquiry and probe the matter minutely and submit the report to the undersigned within a week positively.

TORs:

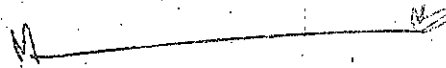
1. Verification of Office Order issued under Endstt: No. 2701-03 Dated 01/10/2012 issued by Ex-EDO (E&SE) Mansehra from DEO (Male) Mansehra.
2. Application submitted by SPET in which she requested for teaching higher classes.


District Education Officer
(Female) Mansehra

Ends: No. 21065-67 /Estt: Branch/AE-I/PET
Copy to the:-

Dated: 24/11/ /2017

1. District Education Officer (Male) Mansehra with the request to please facilitate the inquiry officer.
2. Chair Person / Member.
3. Office Copy.


District Education Officer
(Female) Mansehra

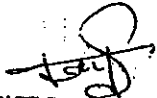
24/11/17

ANNEXURE "N" 56

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

CANCELLATION.

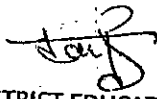
Office order issued by Ex- District Education Officer (E&SE) Mansehra No 2701-3 dated 01.10.2012 in respect of Munaza Khatoo PET is hereby cancelled with immediate effect in the interest of public service.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Dated 22/10/ /2015.

Endstt: No 106/14-17 /CT(F)

1. The District Accounts Officer Mansehra
2. Principal GGHS No n2 Mansehra.
3. Teacher concerned.
4. Office file.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD

Service Appeal No. 885/2015

Date of Institution... 06.08.2015

Date of decision... 18.09.2017



Mst. Munnazza Khatoon, D/O Habib Shah, Government Girls Higher Secondary
School No. 2 Mansehra. ... (Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary, E&SE, Peshawar
and 2 others. (Respondents)

MR. MUHAMMAD ARSHAD KHAN TANOLI,
Advocate ...

For appellant.

MR. MUHAMMAD BILAL
Deputy District Attorney ...

For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. MUHAMMAD AMIN KHAN KUNDI, ...

CHAIRMAN
MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned
counsel for the parties heard and record perused.

FACTS

2. The appellant was appointed as P.E.T (BPS-15) on 04.05.2009 and when
she was posted at Government Girls Higher Secondary School No. 2 Mansehra on
07.12.2010, she was directed to teach the subject of Physical Education to higher
secondary school classes till further orders. The appellant was however, not paid
the emoluments of the higher post against which she was directed to officiate. The
appellant then moved an application to the Secretary of the department on
02.04.2015 for her regular promotion as DPE for the reason that she was eligible
for the same and had been officiating against the vacant post of DPE. Thereafter

Handwritten signature and stamp at the bottom left corner.

the appellant approached the Worthy Peshawar High Court in Writ Petition which was finally withdrawn by the counsel for the petitioner (appellant) in order to seek remedy from the proper forum on 25.06.2015. Then the appellant approached this Tribunal on 06.08.2015.

ARGUMENTS

3. The learned counsel for the appellant argued that the appellant had been officiating against the vacant post of DPE right from 01.10.2012. That she is otherwise eligible for promotion but promotion was not given to her nor she was given the pay of of the higher post against which she has been officiating nor any additional allowance was granted to her.

4. On the other hand, the learned Deputy District Attorney, argued that there is no final or appellate order wherefrom the appellant is aggrieved. That this Tribunal has got no jurisdiction to allow promotion to any civil servant. That the post of DPE falls within the purview of Public Service Commission.


CONCLUSION.

5. There is no original order wherefrom the appellant is aggrieved. She did file a departmental appeal but that appeal was confined only to her promotion to BPS-17. There is no mention of any payment of pay of higher post in that departmental appeal. The Writ Petition filed by the appellant was withdrawn by herself and it cannot be deduced from that withdrawal order that this Tribunal has the jurisdiction in the matter. It is an admitted position of law that this Tribunal cannot order for promotion of any person. At the


most the Tribunal can order for the consideration of a civil servant if otherwise he/she is eligible. It cannot be determined that whether the said post is reserved for promotion quota or direct appointment. In the present appeal this Tribunal cannot reach the conclusion that the appellant was eligible or fit for promotion and has been left out of her due promotion, therefore, no order as to the consideration of the appellant for promotion can be passed.

6. The appeal is therefore dismissed, however, the department is directed to consider the claim of the appellant for pay/additional charge allowance for the period for which she had been serving in officiating capacity on the higher post and decide the same on merit. Parties are left to bear their own costs. File be consigned to the record.

Sd/- Niaz Muhammad Khan, Chairman
Sd/- M. Anis Khan Kundi, Member
Commissioner


Secretary
Faisalabad

ANNOUNCED
18.09.2017

Date of Presentation of Application	12-10-17
Number of Words	1200
Copying Fee	8-
Urgent	12-
Total	10-
Name of Candidate	
Date of Presentation	12-10-17
Date of Receipt	12-10-17

- P -
ANNEXURE (60)

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

As requested by Munazza Khatoon
Two copies of the paper
Books attached and original case
returned to the
Petitioner
in person
District Officer

C.P.L.A No. ____/2017

*Two
week's
further time
is requested.*

Munazza Khatoon daughter of Habib Shah, Govt. Girls
Higher Secondary School No.2, Mansehra.

.....Petitioner

29-11-2017
Petitioner in person.

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary
Education Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar.

referred today by
District Officer
Education Offices

2. Director Elementary & Secondary Education, Khyber
Pakhtunkhwa, Peshawar.

3. District Education Officer (Female), Mansehra.

in person
(2)

.....Respondents

CIVIL PETITION UNDER ARTICLE 185 (3)
OF THE CONSTITUTION OF THE ISLAMIC
REPUBLIC OF PAKISTAN, 1973, FOR
LEAVE TO APPEAL AGAINST THE
JUDGMENT DATED 18.09.2017 PASSED BY
THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, CAMP COURT ABBOTTABAD IN
SERVICE APPEAL No.885/2015.

Respectfully Sheweth.

The following points of law arise for consideration in this case by this August Court:-

LAW POINTS

- A. Whether, on the facts and in the circumstances of this case, the learned Service Tribunal was legally correct and justified in dismissing the appeal of the petitioner for reasons stated in the impugned judgment.

- B. Whether the reasons given by the learned Service Tribunal in support of its impugned judgment, are legally sustainable because they do not get any support from the law on the subject and from the facts of the case justifying grant of BPS-17 from the date of office order dated 01-10-2012 with all back benefits?

- C. Whether the petitioner in view of the facts of the case and the law applicable³ in the case,

MP

was not entitled to grant of PBS-17 from the date of office order dated 01-10-2012 with all back benefit for which she was fighting from the very start of the case?

D. Whether the present is not a case of misreading and not reading on the material on the record and as such whether the impugned order does not need to be modified with the order of grant of BPS-17 with all back benefits to the petitioner from the date of office order dated 01-10-2012?

E. Whether the petitioner is not entitled to the same relief which had been granted by the Service Tribunal in appeal No. 95/95 by its judgment dated 16-07-1996 and as per notification dated 15-02-1999 by which the appellant before the service tribunal had been granted relief which relief stands stated in the notification dated 15-02-1999 as under:-

“----- is hereby allowed graded pay in PBS-17 along with increments against the post of subject specialist w.e.f 23-05-1988”

F. That since the petitioner is possessed of full qualification, she is also entitled to claim her seniority against the post of subject Specialist. The petitioner now claims her seniority against the post of subject specialist. And this Hon'ble Court has full power and jurisdiction to grant this relief as well.

BRIEF FACTS.

1) That the facts relevant for the purposes of this petitioner for leave to appeal briefly stated are as under:-

- i. That the petitioner completed her course of Junior Diploma of Physical Education (JDPE). On 27-09-2005 result of which was declared on 19-07-2006 by the

Sarhad University of Science and Information Technology, Peshawar.

- ii. That after having been declared a successful in the above mentioned Diploma course, the petitioner applied for the post of PET. The petitioner appeared in the written exam held by the Executive District Officer E&S, Education Mansehra. The petitioner passed the Exam and also appeared in the interview before the departmental Selection committee and after been selected and approved by the Departmental Selection Committee, the competent authority was pleased to appoint the petitioner as PET (F) (Trained) against vacant post in Govt. girls Middle School Mera Amjad Ali vide office order No. 6724-66 dated 04-05-2009.

- iii. That the petitioner after having been selected for the above said post of PET (

F) joined service in the Govt. girls Middle School Mera Amjad Ali.

iv. That the petitioner was subsequently transferred from the above said school to serve Govt. Girls High School No.2 Mansehra vide transfer letter No. 17522-26 dated 07-12-2010.

v. That it may be stated here with respect that the petitioner was serving as PET in GGHSS No.02 Mansehra when a surprise visit was made by the Executive District Officer who during his surprise visit found that students of higher secondary classes in the subject of physical education were suffering because the post of DPE was laying vacant since its sanctioned. To resolve this issue the Executive District officer was pleased to issue office order directed the petitioner to teach the subject of Physical Education at higher secondary classes / level as DPE being qualified till further orders

vide office order No. 2701-03 dated 01-10-2012.

- vi. That since the issuance of office order dated 01-10-2012 the petitioner is performing the job of DPE in the Govt. Girls Higher Secondary School No.2 Mansehra in obedience to the above said order dated 01-10-2012.
- vii. That the petitioner thereafter was promoted on the recommendation of the Departmental Promotion Committee and in pursuance of the of the Govt. of KPK elementary and Secondary Education Notification dated 11-07-2012 and Finance Department endorsement dated 16-07-2012, was promoted to the post of Female Senior PET BPS-16.
- viii. That after the issuance of this Notification the petitioner re-join service in the same school.

ix. That it may be stated here with respect that before the issuance of this Notification dated 16-02-2017, the petitioner's had already filed Service Appeal No. 885/2015 before the KPK Service Tribunal Camp Court at Abbottabad with the following prayer :-

“ It is , therefore, humbly prayed that on acceptance of the instant appeal, respondents department may graciously be directed to absorb/appoint the appellant as DPE against the vacant post in the said school with effect from the date of Teaching Higher Secondary Classes i.e 01-10-2012 and 20 % pay for additional charge may also be granted on the analogy of a similar case title “Muhammad Riaz V/s KPK & others” decided by service Tribunal Khyber Pakhtunkhawa, Peshawar in appeal No. 92/95 dated 16-09-1996 with all service back benefit”



x. That this appeal was contested by the respondents and the learned Service Tribunal after hearing vide its judgment dated 18-09-2017, was pleased to dismiss the appeal. However while dismissing the appeal the learned Service Tribunal was pleased to pass further order as under:-

“The appeal is , therefore, dismissed, however, the department is directed to consider the claim of the appellant for pay/ additional charge allowance for the period for which she had been serving in officiating capacity on the higher post and decide the same on merit”.

xi. That it is submitted in respect that the dismissal of the appeal by the learned Service Tribunal is against law and facts on the file and is liable to be set-aside by this Hon'ble Court for a variety of reasons which will be submitted before this

(69)

Hon'ble court at the time of hearing of the case. The petitioner was entitled to be granted PBS-17 from 01-10-2012 from which date the petitioner was performing the duties as DPE. This relief to which the petitioner was fully entitled under the law was not granted to her by the learned Service Tribunal and it is for this reasons the petitioner is approaching in this Hon'ble court for the relief to which she is entitled i.e is the relief from 01-10-2012 in the grade of BPS-17 with all back benefits. The points involved are of substantial in nature and are of general public importance in interest. A perusal of these law points stated in Para No.1 above, would reveal that the points being raised do need and authoritative judgment by this Hon'ble Court. The present is therefore a fit case for grant of leave.

(70)

PRAYER:-

It is, therefore, respectfully prayed that Civil Petition leave to appeal may kindly be granted against the impugned judgment dated 18.09.2017, passed by the Khyber Pakhtunkhwa Service Tribunal, Camp Court Abbottabad in Service Appeal No.885/2015.

DRAWN & FILED BY



Munazza Khatoon d/o Habib Shah,
Govt. Girls Higher Secondary School No.2,
Mansehra

Petitioner-in-Person
Cell No.0333-5028898

Dated: 17-11-2017

CERTIFICATE:

Certified under instructions that prior to this no other petition against the impugned Order and Judgment was filed by the petitioner before this Honourable Court.



Petitioner-in-Person

71

The District Education Officer
Male Mansehra.

Subject: Court Case under CPLA NO 4813/2017 before the August
Supreme Court of Pakistan

Sir,

Respectfully submitted, while working as PET at GGHSS No 2 Mansehra, an urgent need of the service of DPE aroused due to vacant post and the Department, considering the Higher Education of applicant assigned the duty of higher post by bringing into effect the order dated 01-10-2012, issued by the EDO E&SE Mansehra.

The applicant joined the higher post on 01-10-2012 on the requirement of the School, knowing that she was working with her own pay and grade. After the period of four years continuously working at the higher post the applicant was almost entitled due to considerable experience as well as higher qualification sought relief at the forum of Honorable Service Tribunal Peshawar. The Service Tribunal, through its judgment, announced the entitlement of pay and other emoluments of grade 17 in favor of applicant. In order to claim the seniority of the post since its operative date with effect from 01-10-2012, the applicant deemed it fit to seek for appropriate relief at the highest forum and hence CPLA No 4813/2017 has been brought about.

While on the hearing date before the August Supreme Court of Pakistan, the respondent on behalf of DEO Female Mansehra tried to suppress the material fact by displaying a copy of so-called Inquiry denouncing the order

The situation was thus, wittingly, thrown into a state of confusion and mystery. It was quite astonishing and unthinkable that the order dated 1/10/2012, issued by the competent authority, could be a faked document. How can its validity be unrecognized when two years legal proceeding at the forum of Service Tribunal was held and a judgement had already been passed on the basis of said order? How its authentication can be questioned after passing of seven years of its implementation? Why did the Department preferred to remain silent for seven years? Why the respondent failed to point out during the Court proceeding at the forum of Service Tribunal? So, these questions should be answered before painting any legal documents as faked. Since then, applicant had been working at the higher post on the basis of the said order which provides the legality of its origin in form of School Timetable, Result Statements, ACRs, Performance/Duty Certificates and other Awards granted to applicant from time to time by the Department. All these are testimonial proofs provide that the applicant had been discharging her duty against higher post admittedly as well as undeniably on the foundation of the said order.

Therefore, the statement of the respondent of DEO Female Mansehra against the said order is nothing than malafied, based on ill-will as well as unfounded partial inquiry. The recognition of the said order, issued by the competent authority, needs to be further recognized by the DEO Male Mansehra, through close scrutinizing of record, as at that time the offices of the SDEO Female & Male were also functioning under the jurisdiction of EDO E&SE Mansehra, and their dispatched record may also be traced out and may kindly be further testified and reaffirmed well in time before the August Supreme Court of Pakistan please.

Received
23/8/19

Obediently Yours,

Munazza Khatoon SPET
GGHSS No. 2 MANSEHRA

26.3.19

(73)

2678	2619	DO Male	Pen Em case	2/10/19
2678		DO Male	Prison case	2/10/19
2680		DO Male	Search please 10015	
2681		Reservé passport app	Not	10118
2682		"	Not	10118
2683-85		All card	Notification on, Head for	
2686-88		All card	Matr order	
2688-92	2719	All card	Matr Transfer	
2693	2719/200	DO Sponsor	Payment	
2694	"	Mr. Angrie for JAPABA	Case Study/ based study	
2695	2519	DO Male	Elaine of Pine	
2696	"	DO Male	Elaine M. Yumvis. Dist	
2698-2700	1/10/200	Passport Ethn	ATD in 110 M. Riallet 2/15 Bygone	
2698-12	1/10/200	All card	Matr order	PISS
2709-12		All card	order PISS	Munaga Khatoon DETS CC HSS No 2 Mombasa
2713		All Cancel	order office	DDOR
2714		Do Ests Ets Hank	Person Case in the Kagaluu-Redman Rd. DDOR	
2715	2/10/2012	do	PPP application in the 14. Herick Dist (Kiss)	
2716	4/3/10	The Manager's NADRA	maasilwa verification no. Bulet	
2717	9/1/10	O.O. Male MUM	SFC advu...	
2718-21	3/1/10	ADD: DHO LID	complaint PPA	Cap 16
		ad. card	order PISS	

DISTRICT EDUCATION OFFICER
 WAHAI MANGENGA

[Handwritten signatures and stamps]

"Q"
ANNEXURE 74

SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

PRESENT:

Mr. Justice Gulzar Ahmed
Mr. Justice Munib Akhtar

C.P.No.4813 of 2017

[Against the judgment dated 18.09.2017, passed by the Khyber Pakhtunkhwa Service Tribunal, Camp Court Abbottabad in Service Appeal No.885/2015]

Mst. Munazza Khatoon.

...Petitioner(s)

Versus

**Government of KP through Secretary
Education Elementary & Secondary
Education KP, Peshawar & others.**

...Respondent(s)

For the Petitioner(s) : Mr. Aftab Alam Yasir, ASC
Ch. Akhtar Ali, AOR

For the Respondent(s) : Barrister Qasim Wadood,
Addl.A.G. KP

Date of Hearing : 18.10.2019

ORDER

Gulzar Ahmed, J.— The petitioner was appointed as PTC on 01.12.2002 and was appointed as PET on 04.05.2009. It is contended by the learned counsel for the petitioner that through letter dated 1.10.2012, the petitioner was given officiating charge of Director of Physical Education (DPE). He contends that the petitioner was qualified for holding the post of DPE and there was also a vacancy. He contends that the order of such officiating charge was withdrawn vide letter dated 22.10.2015 and the petitioner was reverted to the post of PET, which was not legal and thus challenged the same before the Khyber Pakhtunkhwa Service Tribunal. The Tribunal through the impugned judgment dated 18.09.2017, dismissed the service appeal of the petitioner but



ATTESTED

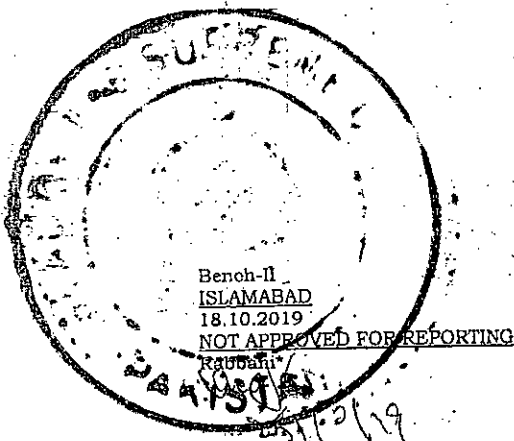
Senior Court Associate
Supreme Court of Pakistan
Islamabad

directed the department to consider her claim of pay/additional charge allowance for the period she served in officiating capacity on the higher post and decide the same on merit. Such judgment of the Tribunal has not been challenged by the respondents.

2. Be that as it may, learned counsel for the petitioner contends that if the case of the petitioner is considered by the respondents for being promoted as DPE, the petitioner will be satisfied and will not press this petition. On the other hand, learned Additional Advocate General contends that the very letter dated 01.10.2012 on the basis of which the petitioner claimed to have been given officiating charge of DPE, was a fake document for that she is facing disciplinary proceedings which have not been concluded owing to pendency of the case before this Court.

3. In the circumstance, the disciplinary proceedings, if any, which the respondents want to take against the petitioner be conducted and concluded expeditiously. In case, the petitioner's name is cleared from the disciplinary proceeding, the respondents shall consider her case for being promoted as DPE subject to her eligibility and qualification.

4. The petition in the above terms stands disposed of.



Sd/-J
Sd/-J

Certified to be True Copy

Senior Court Associate
Supreme Court of Pakistan
Islamabad

A

(1)

ANNEXURE "R" 76

To.

The Secretary Elementary & Secondary Education
Khyber Pakhtoon Khawa Peshawar

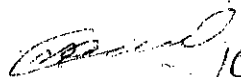
Through: PROPER CHANNEL
Subject: REQUEST FOR IMPLEMENTATION
Sir,

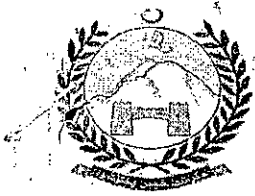
Respectfully submitted, applicant graciously requests that applicant joined the higher post of DPE/IPE on the basis of qualification/ School requirement though office order dated 1.10.2012 at GGHSS No. II Mansehra. After serving at the said post for more than 5 years, applicant being experienced/qualified, filed departmental appeal for regularization but was not considered by the Department. Applicant thus compounded Service appeal and was entitled for pay and emoluments of higher post by the Service Tribunal. Applicant then, again, filed departmental appeal for implementation/ regularization for the post, but in vain, against which applicant sought jurisdiction of august Supreme Court. The judgement of august Supreme Court came in favor of applicant entitling her for higher post of DPE/IPE. Para 3 of the judgment identifies that the Department shall consider the applicant case for promotion.

As there is no departmental proceeding pending against the applicant, therefore, applicant earnestly request for implementation of the said judgement of the august Supreme Court to be effective and entitled wef 1.10.2012 at GGHSS No. II Mansehra along with seniority/ back benefits. Applicant also furnishes/ provides other educational/ service documents pertaining to qualification/ eligibility of the post of DEP/IPE at GGHSS No. II Mansehra please.

Thanking in anticipation

Obediently Yours


10-1-2020
Munazza Khatoon, SPET-16
GGHSS -II Mansehra



(77)

**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**



deofmanshra@yahoo.com



(+92) 0997-390035

No. 788
To

Dated: 22/1/2020

The Director Elementary & Secondary Education,
Khyber Pakhtoonkhwa Peshawar.

SUBJECT: IMPLEMENTATION

Memo:

The self-explanatory application in r/o Mst.Munazza Khatoon, SPET GGHSS NO 2 Mansehra is submitted for the implementation as per the judgement of August Supreme Court of Pakistan Dated.18/10/2019, as well as onward submission to the authority concerned please. Judgement of Supreme Court is attached here with for further necessary action.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst No: 789-91 /ASDEO-II Dated 22/1/2020

Copy to the:-

1. Secretary Elementary & Secondary Education Peshawar.
2. Registrar August Supreme Court of Pakistan.
3. Office record.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

78

Most Immediate
Court Matter



DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR

Phone No: 091-9225339, Fax # 091-9219938

No. _____ /AD (Lit-II) Dated Peshawar the _____ / 2020

To

The Section Officer (Lit-II)
EGSED Khyber Pakhtunkhwa
Peshawar.

Subject: **GUIDANCE/IMPLEMENTATION OF JUDGMENT DATED 18-09-2017 IN S/A NO.885/2015 MUNAZZA KHATOON SPET MANSEHRA VS GOVT.**

Memo:

I am directed to enclose a copy of the letter No JB35-37 dated 21-02-2020 along with relevant document/record received from DEO (F) Mansehra, seeking for implementation of the judgment dated 18-10-2019 of august Supreme Court of Pakistan rendered in C.P No. 4813 of 2017 case titled Mst. Munazza Khaton SPET B-16 (P) District Mansehra Vs Govt.

Detail History of the case is as under:-

1. That the appellant was appointed as PET B-15 vide order dated 04-05-2009 and was posted at GGSS NO.2 Mansehra on 07-12-2010.
2. That during surprise visit to the school, the then EDO Mansehra directed the teacher concerned vide order dated 01-10-2012 to teach the subject of Physical Education till further order due to the vacant post of regular DPE B-17.
3. That she filed an S/A No.885/2015 before the Service Tribunal Peshawar for promotion/absorption as DPE in B-17 for the reason that she was eligible for the same & had been officiating against the vacant post of DPE.
4. That the Honorable Service Tribunal dismissed the appeal of the appellant vide Para-6 of the Judgment dated 18-09-2017. Para-6 of the said Judgment is reproduced as under: *"The appeal is therefore dismissed, however, the Department is directed to consider the claim of the appellant for pay/additional charge allowance for the period for which she had been serving in officiating capacity on the higher post in decide the same on merit"*
5. That aggrieved from the said Judgment she filed a CPLA before the august Supreme Court of Pakistan & the same was decided vide Judgment dated 18-10-2019 with the direction to the Respondent Department as under: *"In case, the petitioner's name is cleared from the disciplinary proceeding, the Respondents shall consider her case for being promoted as DPE subject to her eligibility & qualification"*

In view of the above facts & circumstances, the case in hand is forwarded for grant of guidance/implementation of the Judgment under reference as the assertion of the appellant is to be promoted to the post of DPE B-17 for the reason that she had been officiating against the vacant post of DPE B-17, being a competent authority please.

Asstt. Director (Lit: II)
EGSE Khyber Pakhtunkhwa,
Peshawar.

Endst: No: _____

Copy forwarded to the:-
1. District Education Officer (F) Mansehra.
2. PA to Director, local Directorate.

Asstt. Director (Lit: II)
EGSE Khyber Pakhtunkhwa,
Peshawar.

(79)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

MOST IMMEDIATE / COURT MATTER.

NO.SO (Lit-II) E&SED/1-3/SA # 885-A/15/Munazza Khatoon SPET

Dated Peshawar, the 20-10-2020

To

The Section Officer (Opinion-I)
Law Department, Govt. of Khyber Pakhtunkhwa.

Subject:

GUIDANCE/ IMPLEMENTATION OF JUDGMENT DATED 18-09-2017
IN SA NO. 885/2015 MUNAZZA KHATOON SPET MANSEHRA VS
GOVERNMENT.

I am directed to refer to your letter No. SO(OP-I)/LD/5-6/Vol-VII/10057-59 dated 13-10-2020 on the subject noted above and to enclose herewith a copy of judgment dated 18-10-2019 of Supreme Court of Pakistan passed in CP No. 4813 of 2017 titled Mst. Munazza Khatoon Vs Govt. of Khyber Pakhtunkhwa through Secretary E&SE and others for perusal as desired, please.


Enc: as above.

Endst: of even No. & date.

Copy is forwarded to:-

1. PS to Secretary, E&SE Department.
2. P.A to Deputy Secretary (Legal) E&SE Department.


SECTION OFFICER (LIT:II)


SECTION OFFICER (LIT:II)



Government of Khyber Pakhtunkhwa
Law, Parliamentary Affairs &
Human Rights Department

ANNEXURE

80

No. SO(OP-I)/LD/5-6/2012-VOL-VII/11936-38
Dated: Pesh: the 11 November, 2020

To

The Secretary to Government of Khyber Pakhtunkhwa,
Elementary and Secondary Education Department.

Attention: Section Officer (Lit-II)

Subject: GUIDANCE/IMPLEMENTATION OF JUDGMENT DATED 18.09.2017 IN SA
NO. 885/2015 MUNAZZA KHATOON SPET MANSEHRA VS
GOVERNMENT

Dear Sir,

I am directed to refer to your department's letter No. SO(Lit-II)E&SED/1-3/SA#885-A/15/Munazza Khatoon SPET dated 20.10.2020 on the subject noted above and to state that the Supreme Court of Pakistan has directed vide its judgment dated 18.10.2019 passed in CP No. 4813/2017 that the disciplinary proceedings, if any, which the respondents want to take against the petitioner, be conducted and concluded expeditiously. In case, the petitioner is clear from the disciplinary proceedings, then her case may be considered for promotion subject to eligibility and qualification.

Yours faithfully,

N.S.
11-11-2020
Section Officer (Opinion-I)

Encl: of even No. & date.

- Copy forwarded for information to the:
1. PS to Secretary, Law Department
 2. PA to Additional Secretary (Opinion)

Section Officer (Opinion-I)

S.O. (Lit-II)

Diary No.	2127
Dated:	10/11

8115



ANNEXURE ^T (81)

DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA



deofmansehra@yahoo.com



(+92) 0997-390035



Endst: No _____ Dated _____ / 2020

TO

The Assistant Director(Lit:II),
Elementary & Secondary Education,
Khyber Pakhtunkhawa Peshawar.

Subject: DISCIPLINARY PROCEEDING

Memo:

In reference to your letter no:1278/AD(lit:II) dated 01/12/2020 on the subject noted above, it is submitted that no disciplinary proceeding is pending against Mst. Munazza Khatoon (SPET) GGHSS No.2 Mansehra as per this office record. This case may be proceeded as per rule.

Sd/-

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

Endst: No 214 2014 (A to D)

Dated 03/02 / 2020

Copy to:-

1. Deputy Secretary Legal Office of Secretary Education Khyber Pakhtunkhawa Peshawar.
2. Section Officer (Lit:I) Law Department Khyber Pakhtunkhawa Peshawar.
3. Section Officer (Lit:II) E&SE Department Khyber Pakhtunkhawa Peshawar.
4. PA to Director, Local Directorate.

**DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA**

U
ANNEXURE 82

The Secretary Elementary & Secondary Education,
Khyber Pakhtoon Khawa Peshawar.

Subject. IMPLEMENTATION.

Sir,

Graciously requested that applicant was serving in the Department as a regular PET at GGHSS No.2 Mansehra. In the meanwhile, the post of DPE was sanctioned and being academically/ professionally qualified teacher, the Department availed the service of applicant as DPE through officiating order dated 01.10.2012.

After serving more than three years on the said post of DPE, applicant furnished appeal for regularization to the higher authority through proper channel on the basis of qualification as well as performance successfully carried out for more than three years. But the same had gone unheard and applicant, under compulsive circumstances, sought the jurisdiction of Service Tribunal and later the august Supreme of Pakistan, wherein the decisions of Honorable Courts came in favor of applicant.

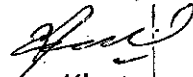
But, even after passing of both the judgments, nearly two years have passed and the process of implementation is still awaited at Directorate Peshawar. Although the requirements of implementation have been fulfilled and the situation is clear like crystal that no departmental proceedings stands against the applicant, besides the advice of Law Department in favor of implementation.

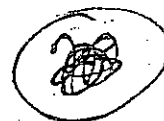
Applicant, therefore, seeks your kind jurisdiction that applicant may very kindly be regularized as DEP/IPE at Govt. Girls Higher Secondary School No. 2 Mansehra alongwith other benefits of Seniority, Graded pay and Allowances with the effect from the effective date of 01.10.2012 please.

Thanking in anticipation.

Dated 28.06.2021

Obediently Yours


Munazza Khatoon, SPET
GGHSS No. 2 Mansehra



ANNEXURE 83

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Peshawar, dated the 24th July, 2014.

NOTIFICATION

تنظیم اساتذہ عالیہ کپیٹ - خیرانندہ واری، سیالکوٹ، ضلع چاغیا، شہید قیصر گورنمنٹ کالج، کراچی
03339-18249 / 0300-5642594 / 0300-5737622 / 0301-8915658

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB, dated, 13-11-2007, and Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,-

(i) Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be inserted in respective columns, namely:

1	2	3	4	5
1	Subject Specialist (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or M.A. Education or equivalent qualification from a recognized University.	23 to 35 years	(a) Fifty per cent by promotion, on the basis of seniority cum-fitness, for the relevant subject from amongst the Secondary School Teachers (BPS-16), with at least five years service as such and having qualification mentioned in column No. 3. Note: If no suitable candidate is available in the relevant subject the post falling in their promotion quota shall be filled by initial

Muhammad Aslam
District Officer, Abbottabad

IA	Director Physical Education (BPS-17)	At least second class Master's Degree in Physical Education from a recognized University.	22-35 years	recruitment; and (b) fifty percent by initial recruitment. 0303-5642594.
				(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Physical Education Teachers (BPS-16), with at least five years service as Senior Physical Education Teacher and Physical Education Teacher and having qualification mentioned in column No. 3:
				Provided that if no suitable person is available from amongst Senior Physical Education Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst the Physical Education Teachers, with at least five years service as such and having qualification mentioned in column No. 3;
				Note:- If no suitable candidate is available in the relevant cadres of the above teachers the post falling in their promotion quota shall be filled by initial recruitment; and
				(b) fifty percent by initial recruitment; and

Attested
[Signature]

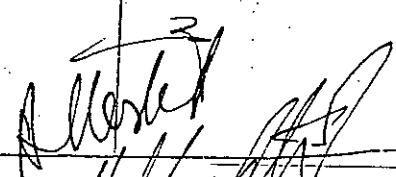
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151

(ii) against Serial No. 1B, as so renumbered, for the existing entries, the following shall be substituted, in respective column namely:

Tarjuma-e-Akshara KPIA 0301-8915658-0300-5842574

1	2	3	4	5
"1B.	Secondary School Teacher (BPS-16)	<p>I. At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject</p> <p>(a) (Chemistry, Botany or Zoology), Or (b) (Physics, Maths "A" or "B" or Statistics) Or</p> <p>(c) (Humanities and other equivalent groups at degree level with English as compulsory subject;</p> <p>and</p> <p>II. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualifications from a recognized University.</p>	21 to 35 years.	<p>1... Seventy Five per cent by promotion, on the basis of seniority-cum-fitness, from the district concerned in the following manner:</p> <p>(a) - forty per cent from amongst the Senior Certified Teachers (BPS-16), with at least five years service as Senior Certified Teacher and Certified Teacher and having qualification mentioned in column No.3:</p> <p>Provided that if no suitable candidate is available from amongst Senior Certified Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers, with at least five years service as such and having qualification mentioned in column No. 3;</p> <p>(b) four per cent from amongst the Senior Drawing Masters(BPS-16), with at least five years service as Senior Drawing Masters and Drawing Masters and having qualification mentioned in column No.3:</p>


 Muhammad Arshad Khan Tanoli
 District Court, District
 (3)

Tanzeem-e-Academy U.P.

0301-8915888

Attested
[Handwritten signature]

Muhammad Arshad Khan Tanoli
Director of Studies
Tanzeem-e-Academy U.P.

(4)

Provided that if no suitable candidate is available from amongst Senior Drawing Masters for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Drawing Masters with at least five years service as such and having qualification mentioned in column No. 3;

(c) four per cent from amongst the Senior Arabic Teachers(BPS-16), with at least five years service as Senior Arabic Teachers and Arabic Teachers, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst Senior Arabic Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Arabic Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(d) four per cent from amongst the Senior Theology Teachers(BPS-16), with at least five years service as Senior Theology Teachers and Theology Teachers and having qualification mentioned in

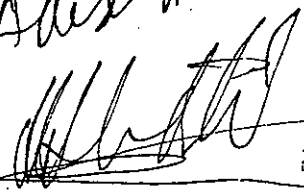
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 0800 8842594 -
 0300 5737622 -
 0333-9018249 -

Adesh


Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and having qualification mentioned in column No. 3;

(e) three per cent from amongst the Senior Qaris (BPS-16), with at least five years service as Senior Qari and Qari, and having qualification mentioned in column No.3:

Provided that if no suitable candidate is available from amongst the Senior Qaris then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) twenty per cent from amongst the Primary School Head Teachers (EPS-15), with at least seven years service as Primary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is available from amongst

(15)

Primary School Head Teachers for promotion then the post shall be filled by promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least seven-years service as Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No.3:

Provided further that if no suitable candidate is available from amongst Senior Primary School Teachers for promotion then the post shall be filled from amongst Primary School Teachers with at least seven years service as such and having qualification mentioned in column No. 3; and

(ii) twenty five percent by initial recruitment.

Note:

- I. If no suitable candidate is available in the relevant cadre of the above teachers, the post falling in their promotion quota shall be filled by initial recruitment.
- II. Posts of General SST and SSTs-1 Science and SST-2 Science shall be filled by promotion or initial recruitment, each on need basis separately.

Muhammad Arshad
Muhammad Arshad
 Muhammad Arshad
 Distt: C.A.S.

TANMUL
 CARE
 LABAY

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(89)

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA.
16. All Agency Account Officer in FATA.
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file

Muhammad Arshad Khan

Muhammad Arshad Khan
Advocate
Distt. Courts Abbottabad

Zarwan Momo
(ZARWAN MOMO)
SECTION OFFICER (PRIMARY)

(7)

وکالت نامہ

بعدالت جناب سروس ٹریبونل لیسٹور کیمب کورٹ ایٹ آباد
جنزہ خاتون بنام گورنمنٹ وٹسیرہ
دعویٰ باجرم سروس ایٹیل منجاب ایٹیل

باعث تحریر آئیکہ


اندزیں مقدمہ عنوان میں اپنی طرف سے برائے بیرونی اور جواب دہی مقام ایٹ آباد

مشیر حسین لغمانی ایڈووکیٹ سپریم کورٹ آف پاکستان

کو بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بوقت پکارے جانے پر وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہوں اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہوں۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر بروز پکھری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے بختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے کہ مجھے کل ساختہ پر داختہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر حافی اپیل کمرانی دائر کرنے نیز روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد ثالثی وراثی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا سوشی ڈگری یکطرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ بیرونی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا ایٹیل کے واسطے کسی دوسرے وکیل یا بیرونی کو بجائے اپنے ہمراہ مقررہ کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ یہ سند ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 27 اکتوبر 2021ء

Attested & Accepted


Muneer Hussain Lughmani
Advocate Supreme Court of Pakistan

جنزہ خاتون دفتر صیب ۱۵ گلبرگ ہاروی کورٹ ہاؤس ٹائپ ٹائٹل ایٹیل



(91)

وکالت نامہ

بعدالت مشروس ٹریبونل پشاور ٹیپ کورٹ ایٹ آباد

منترہ خالون بنام گورنمنٹ منسیرہ

نوعیت مقدمہ مشروس ایپل

منجاب: ایٹ لارنٹ

باعث تحریر آنکہ!

ایٹ آباد

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیروی وجواب دہی ہر مقام

محمد ثاقب لغمانی ایڈووکیٹ ہائی کورٹ مانسیرہ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص زود و عدالت حاضر ہوتا رہوں گا اور یوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری، علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہو گئے اگر مقدمہ مقام پکھری کے آگے یا پیچھے ساعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء کے ذگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور شید و سیدہ ردائل کرنے کا، ہر قسم کا بیان دینے اور سپرد تالی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا مشورتی ڈگری یا طرفہ درخواست حکم اختتامی یا فیصلہ ڈگری و اجراء کے ذگری بھی صاحب موصوف کو بشرط ادا جنگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح کھجھ لیا ہے اور منظور ہے۔

مورخہ 27 اکتوبر 2021

Attested & Accepted

MUHAMMAD SAQIB LUGHMANI

ADVOCATE HIGH COURT

MANSEHRA

منترہ خالون منسیرہ منسیرہ

M. Saqib

“B”

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

No.

7684

21

Appeal No. *Munazza Khatoon* of 20

Appellant/Petitioner

Imran Sayy (ESSE) Pesh

Respondent

Respondent No.

Notice to:

*Secretary Establishment Deptt
KPK Peshawar*

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 *on.....at 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 No.....dated..... *14*

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20

*at camp court
A/Abad.*

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.
PS/Secy E&AD KP

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.
Date: _____

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,

PESHAWAR **TB A/Abad**

No. **Pre admission**
Notice

Appeal No. **7684** of 20 **21**

Munaza Khatoon Appellant/Petitioner

Through Secy: (F&SE) Pesh Respondent

Respondent No. **1**

Am
14/1/22

Notice to: **Govt of KPK Through Secretary**
(F&SE) Peshawar

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 *on **20-1-2022** at **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 No. dated

Given under my hand and the seal of this Court, at Peshawar this **14**

Day of **1** **2022**

at camp court
A/Abad.




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.

B

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

No. for registration
1084
Appeal No. of 20 21

Appellant/Petitioner
Muzaffar Khan
Khan

Respondent No. 1
The Government of Khyber Pakhtunkhwa

Notice for: -
Court of KPK Tribunal, Peshawar
(Case)

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 (his Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 20-1-2022 at 8:00 A.M. If you wish to urge anything against the appeal/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 authorized representative or by Advocate duly authorized by your power of Attorney. You are requested to file in this Court at least seven days before the date of hearing 1 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
off. Notice No. dated

Given under my hand and the seal of this Court at Peshawar this 10th day of 1-2022

Registrar
Khyber Pakhtunkhwa Service Tribunal,
Peshawar

at court
H. A. B. A. S. I.

1. The hours of attendance in the court are the same as in the High Court except on Thurs and Gazetted Holidays
2. Always quote Case No. While making any correspondence

"B"

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

No. TRB A/A
Appeal No. 7684 of 20 21
Munazza Ishaq Appellant/Petitioner
Versus
Through Secy. (CESSE) Pesh Respondent
Respondent No. 3

Notice to: Secy: Finance KPK
Dairy No. 14-1-22
Date 14-1-22
Secretary Finance Deptt KPK
Peshawar

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 *on 22-1-22 at 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 No. dated

Given under my hand and the seal of this Court, at Peshawar this 16

Day of 20 22

at camp court
A/Akad.


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.

Note: 1. The dates of attendance in the court are the same as those of the High Court except on Fridays and Observed Holidays.
2. Where there is a change in the date of attendance, the Registrar will be notified.

REGISTRAR
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
REGISTRAR

Handwritten notes:
1. 1/1/1997
2. 1/1/1997

Date of 20 57

Given under my hand and the seal of this Court at Peshawar this

of 9 Notice No. dated

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

the appeal/petition. Notice posted to this address by registered post will be deemed sufficient for the purpose of appeal/petition. If you fail to furnish such address you address contained in this notice which the Registrar of any alteration in the date fixed for hearing of this appeal/petition will be

appeal/petition will be heard and decided in your absence. Registrar of your appearance on the date fixed and in the manner aforementioned. The provisions of your appearance upon which you rely. Please also take notice that in the Court at least seven days before the date of hearing 4 copies of written statement of facts and law supported by your power of attorney. You are therefore required to file in the case may be postponed either in person or by authorized representative or by the appeal/petitioner. You are also to do so on the date fixed or any other day to which the hearing is postponed. It is hereby notified that the said appeal/petition is fixed for hearing before the Tribunal the above case by the petitioner in this Court and notice has been ordered to issue. You are

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa

REGISTRAR
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
REGISTRAR

Handwritten notes:
1. 1/1/1997
2. 1/1/1997
3. 1/1/1997
4. 1/1/1997

of appeal No. of 20 57
of appeal No. of 20 57
of appeal No. of 20 57

REGISTRAR
JUDICIAL COMPLEX (OGD), KHYBER ROAD,
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

“B”

“B”

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

No.

TB A/A

Appeal No. 7684 of 20 21

Minazza Chatoon Appellant/Petitioner
Versus

Imogh Sery (CESSE) Regl Respondent
Respondent No. 4

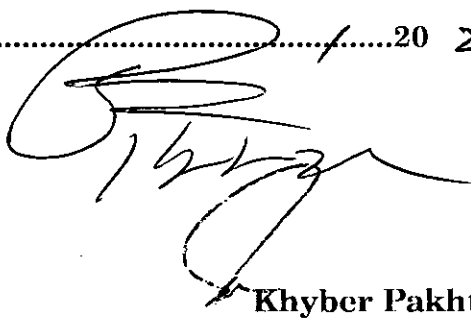
Notice to: - Director (CESSE) KPIC Peshawar

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 *on 22-1-2022 at 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 No. dated

Given under my hand and the seal of this Court, at Peshawar this 14 Day of 20 22

at camp court
A. I. Akbar

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.

BEZHAWAK
КНЯВЕВ БУКТИЦАКНИУ СЕРВИСЕ ТРИВУЛЪ БЕЖИВЪ
BEZHAWAK

[Handwritten scribbles]

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JUDICIAL COMPLEX (OJG) KHYBEIB KOVD

КНЯВЕВ БУКТИЦАКНИУ СЕРВИСЕ ТРИВУЛЪ БЕЖИВЪ

BEZHAWAK

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. *TB H/A*

No.

7684

21

Appeal No. *Misnazza Ishaqoon* of 20

Appellant/Petitioner

Through *Sayyid (EGSE)* ^{Versus}

Respondent

Respondent No. *5*

DIST Education officer (Female)

Notice to:

Manshera

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration the above case by the petitioner in this Court and notice has been ordered to issue. You hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on *20/11/22* at 8.00 A.M. If you wish to urge anything against 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 Advocate, duly supported by your power of Attorney. You are, therefore, required to file 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 No. dated *14*

Given under my hand and the seal of this Court, at Peshawar this..... *22*

Day of..... 20

at camp court

A/Abad.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.