11.08.2022

Clerk to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents.

Written reply on behalf of respondents not submitted. Learned AAG sought time for submission of written reply. Adjourned. To come up for written reply/comments on 28.09.2022 before S.B.

(Fareeha Paul) Member (E)

28.09.2022

Appellant in person present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned Assistant Advocate General seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments before the S.B on 24.11.2022

> (Mian Muhammad) Member (E)

Form-A

FORM OF ORDER SHEET

Court of 896/**2022** Case No.-S.No. Date of order Order or other proceedings with signature of judge proceedings 1 3 2 The appeal of Mst. Tahira Bibi presented today by Mr. Fazal Shah 1-08/06/2022 Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. This case is entrusted to Single Bench at Peshawar for preliminary 15-6.22 2hearing to be put there on 28.6.22. Notices be issued to appellant and his counsel for the date fixed. CHAIRMAN Noteel . Hidoyat Clo Fasal Chur Asc 16622 Learned counsel for the appellant present. Preliminary 28.06.2022 arguments heard and record perused. Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The Appellant Deposited appellant is directed to deposit security and process fee within Security & Process Fee 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for written reply/comments on 11.08..2022 before D.B. (Fareeha Paul) Member (E)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No_____/2022

Tahira Bibi.....Appellant

VERSUS

Director and others.....Respondents

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3.	Copies of Certificates	A	6-9
4.	Copy of Advertisement	В	10
5.	Copy of merit lists, appeal & order dated 19- 05-2017		11-23
6.	Copies of inquiry reports	F&G	24-30
7.	Copy of Writ Petition with order dated 24- 09-2019, Minutes of Scrutiny Committee & order dated 20-04-2020		31-44
8.	Copy of Appeal, grounds of writ petition, comments & order dated 17-03-2022	K, L, M & N	45-55
9.	Vakalat Nama	<u> </u>	56

Dated:-06-06-2022

Appellant

Fazal Shah Mohmand Advocate, Supreme Court of Pakistan

<u>OFFICE:</u>- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841 Email:- fazalshahmohmand@gmail.com

Through

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No____/2022

-

Tahira Bibi Ex Primary School Teacher, Govt. Girls Community Model School Dhakki Tehsil Tangi District Charsadda.

.....Appellant

VERSUS

- **1.** Director, Elementary and Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
- 2. District Education Officer (Female) Charsadda.
- **3.** Secretary, Elementary and Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
- 4. Musarrat Begum, Primary School Teacher, Govt. Girls Community Model School Dhakki Tehsil Tangi District Charsadda.

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 20-04-2020 OF RESPONDENT NO 2, WHEREBY THE APPOINTMENT ORDER OF THE APPELANT HAS BEEN WITHDRAWN AND RESPONDENT NO 4 HAS BEEN APPOINTED AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:-

On acceptance of this appeal the impugned Order dated 20-04-2020, may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits.

Respectfully Submitted:-

- **1.** That the appellant is the permanent resident of Union Council Dhakki Teshil Tangi District Charsadda and is highly qualified who has acquired her SSC, FA & Arabic (Hons). (Copies of Certificates are enclosed as Annexure A).
- 2. That in the year 2016 respondent No 2 invited applications through advertisement for appointment to various posts including the posts of Primary School Teachers, the appellant being perfectly fit, eligible and coming up to the criteria also applied for the post of Primary School Teacher (BPS-12) (herein after referred to as PST) from Union Council Dhakki. (Copy of Advertisement is enclosed as Annexure B).

- **3.** That the appellant appeared in test conducted through NTS which she qualified with 47 score where after tentative merit list was prepared wherein the appellant was not awarded the score for Arabic (Hons) and the same situation prevailed in the second tentative merit list. The appellant forthwith submitted appeal on 13-05-2017 where upon necessary correction was made thus the secure of the appellant came to 100.4 and thus the appellant along with others was appointed as PST vide order dated 19-05-2017. (Copy of merit lists, appeal & order dated 19-05-2017 is enclosed as Annexure C, D & E).
- **4.** That one candidate namely Saima Shah submitted application against the appointment of the appellant, upon which an inquiry was conducted by the Director Education KP which resulted in favor of the appellant however the said Saima Shah still filed another application to the respondent No 3 which resulted in her Favor. (Copies of inquiry reports are enclosed as Annexure F & G).
- **5.** That the said Saima Shah thereafter filed Writ Petition No 2287-P/2017 which after hearing was disposed of with directions to the Departmental Selection Committee for reconsideration strictly in accordance with law and rules on the subject vide Order dated 24-09-2019, upon which the meeting of DSC was convened on 01-12-2019 which held that the appellant was inadvertently given the Arabic (Hons) score and that respondent No 4 be appointed, thus the appointment of the appellant was withdrawn while respondent No 4 was appointed as PST vide order dated 20-04-2020. (Copy of Writ Petition with order dated 24-09-2019, Minutes of Scrutiny Committee & order dated 20-04-2020 is enclosed as Annexure H, I & J).
- 6. That the appellant filed departmental appeal before respondent No 1 and then filed Writ Petition No 2598-P/2020, comments were filed and finally the same was sent to respondent No 1 with directions to decide the appeal of the appellant pending before him not later than one month vide order dated 17-03-2022. (Copy of Appeal, grounds of writ petition, comments & order dated 17-03-2022 is enclosed as Annexure K, L, M & N).
- **7.** That the impugned Order dated 20-04-2020 is against the law, facts and principles of justice on grounds inter-alia as follows:-

<u>GROUNDS:-</u>

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- **A.** That the impugned Order is illegal, unlawful, without lawful authority and void ab-initio.
- **B.** That mandatory provisions of law and rules have been body violated by the respondents and the appellant has not

been treated according to law and rules in violation of Article 4 and 25 of the Constitution.

- **C.** That the appellant was validly appointed as PST on 19-05-2017 on adhoc/contract basis and subsequently regularized in the year 2018 through Act of the provincial Assembly which created valuable rights in favor of the appellant and as such under the principles of locus poententaie, the appointment order of the appellant could not be withdrawn.
- **D.** That Ex-parte action has been taken against the appellant and she has been condemned unheard in violation of Article 10-A of the Constitution.
- **E.** That no Charge Sheet and Show Cause Notice was issued to the appellant.
- **F.** That no regular inquiry was conducted in the matter hence the impugned order is liable to be set at naught.
- **G.** That the appellant was not afforded opportunity of personal hearing.
- **H.** That the findings of the DSC is self-presumed one because the inquiry conducted by Dr Hafiz Ibrahim, the DEO (Female) Charsadda has categorically admitted that the appellant submitted appeal for consideration of Arabic (Hons) preparation of final merit list and after acceptance of her appeal, the merit position of the appellant was corrected.
- **I.** That since illegal termination from service, the appellant is jobless.
- **J.** That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.

Dated:-06-06-2022

Through

Fazal Shah Mohmand Advocate, Supreme Court of Pakistan

Appellant

LIST OF BOOKS

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- 1. Constitution 1973.
- 2. other books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal,

ADVOCATE

AFFIDAVIT

I, Tahira Bibi Ex Primary School Teacher, Govt. Girls Community Model School Dhakki Tehsil Tangi District Charsadda, do hereby solemnly affirm and declare on oath that the contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has drive Psili been concealed from this honorable Tribunal.

DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No____/2022

Tahira Bibi.....Appellant

VERSUS

Director and others.....Respondents

Application for condonation of delay if any

Respectfully Submitted:-

1/2

- **1.** That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
- **2.** That the grounds of appeal may be considered as integral Part of this application.
- **3.** That since the impugned order is void ab-initio being ex-parte and even the appellant duly pursed her claim before the honorable Peshawar High Court, Peshawar besides the departmental appeal of the appellant is still before respondent No 2, such lis are to be decided on merit instead of technicalities.
- **4.** That the law as well as the dictums of the superior Courts also favors decisions of cases on merit.

It is therefore prayed that on acceptance of this application, the delay if any in filing of appeal may kindly be condoned.

Through

Dated:-06-06-2022

This Poib,

Appellant

DÉPONENT

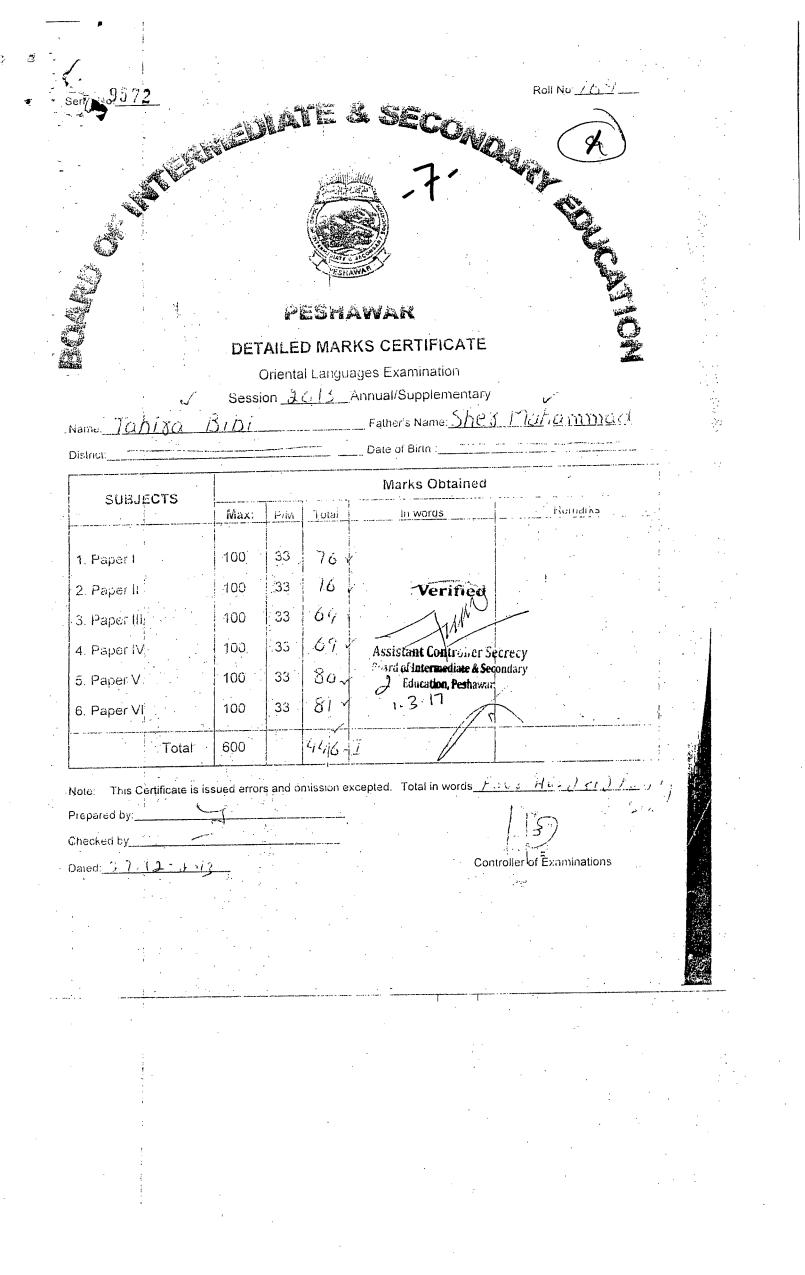
Fazal Shah Mohmand Advocate, Supreme Court of Pakistan

<u>AFFIDAVIT</u>

I, Tahira Bibi Ex Primary School Teacher, Govt. Girls Community Model School Dhakki Tehsil Tangi District Charsadda, do hereby solemnly affirm and declare on oath that the contents of this <u>Application</u>, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

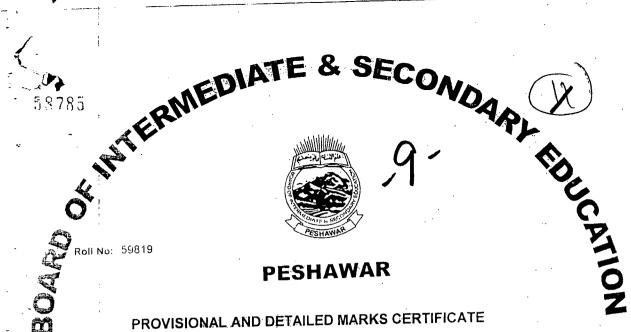
mitti Woard Committee of Jan. Serial No. 007060 mis ين المادي Government of Pakistan Islamadad Equivalence Certificate SHER MUHAMMAD s/d of Mr. TAHIRA BIBI Certified that Mr. /Ms. bas qualification Honours in Arabic & three additional subjects at HSSC level. 11-04-1985 date of birth. 2005-2013 BISE, Peshawar. in Dear of Country and / or Examining Body Which is considered equivalent to Higher Secondary School Certificate of Pakistan Group: Humanities Marks obtained: out of 1100 In Figures_ Seven Hundred & Three only In Mords. -IBCC (SO) P/2-2/2017 (02) Ref id Ramzan Achakzai Date_ -17-03-2017 Secretary Section Incharge.

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Examination	of the Board of Intermediate & Secc	ondary Education, Peshaw	var	
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PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE(ANNUAL) EXAMINATION, 2005

HUMANITIES (Part-II)

<u>Tahira Bibi</u>

Daugther of Sher Muhammad

of Charsadda

has secured the marks shown against each subject in the HSSC Examination held in the month of May as a <u>Private Student</u>

					Ma	arks Ob	otained
Subjects	Marks	Part	:-1	Part	-II	Total	Marks in Words
		Theory -	Pract	Theory	Pract	•	
English	200	36		23 *		59	Fifty-Nine
Urdu	200	44		40		84	Eighty-Four
Islamic Education	50	40				40	Forty Only
Pakistan Ștudies	50			29		29	Twenty Nine
Islamie History	200	37		44		81	Eighty-One
Islamesibled	200	59		51		110	One Hundred Ten Only
	200	64		56		120	One Hundred Twenty Only
stant Controller Secrecy stant Controller Secondary otal : d of Intermediate & Secondary otal :	1100					523-D	Five Hundred Twenty Three Only
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1/3/1/2 Passed with grace marks

Checked By : ___

Issue Date: October 19 2005

NOTE: Error/Omission accepted. Any mistake in above particulars must be intimated within 30 days of the receiving the certificate.

Controller of Examinations

(Computer Cell BISE Peshawar)

Advertisement No.1

المساليمتر ی این تیکنزری ایم کمش خلی به درمده سروم اتلام (زنان) سرادی شراعب دیل کندندک مثال آسامیوں پرانی باک سکول تست (۵۰۹ Adhoc Schoo) تترديل ک 2016 كمددوش تير مطلو. (http://www.nis.org.pk/) بابح SNESCUL چارمد، کے سکونی ال امیدداردان سے اور دفارم مورد . 30 س بادرست كما يأتسل ادد متلوره تاريخ تحز رف سك بعد موسول بوف والى درخواستون يرفو دجين كميا جاسته كل

	ار سے سے چھر سوس ہو سے والی در سی سول پر یو رول کی جو سے جا۔ 	- 01007 150 Coques	د چرپ ې
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	الجريمش تنحى يمى سليم شده مع ندرشى - ي بالشارد ما وكافي لوسان المحركيش	BPS-15	
18 * 35 بال	بی اے، بی الی می باسدادی تا بایت کی بھی تشکیم شدہ نے ندوشی سے محصا یک سالداد ایجک باسٹرکودس مرکع کمیت -	(DM) دراهک منزلس (DM)	2
		BPS-15	
35 120 كال	الس الس يكن (سيكند أومترن) من بحي تسليم شدة بدوا ف بعد هما وة العالية في العلوم العربية واسلام يحن مستنت عقيم وولاق	BPS.15 (AT) 401	3
	المدادس بإدارالطوم سيدوشريف وسواب ودادالطوم جار بارخ سوات ودادالطوم يترال مدارالطوم ودوش بتراف ادركوني وتكر		
	داداملوم جوکوشنت سک زیرا انگنام بود. آدراس کا تو کمینین مکوست سے وقاقو کا جاری کیا بود یا کسی کمی تسلیم شده بینیودی		
	سے وبی ٹر ایکنڈکاس اسٹرڈ گری		
JL-35520	الس الس ك (ميكند وديثرن) مى بحى تشليم شده بونداس بمد صوارة العالميدنى أحلوم التربيد وإسلاميد مي مستحظيم ودقاق	BPS.15 (TT) 10	4.
	المدادس إدادالطوم سيدوثرنف سوات والالطوم بإدبارة موات بطوام جزال مواد للجم ميدوش يترال اودكوف بحكى ويكر		
r 1	وادالعلوم جوكود مست سرويرا اقطام اوداس كالويحيين بتكوست سي وفتا فوالم جادكا كيا يود يا محويكى محكم متدوع غود تحدا ب		
	اسلابیات ش ایکندگلاس استرد کری		
351-18 مال	التوميذين بمدومتذ الترآن اددمند قرامت مى بحي متكود شده الدام سعست	BPS-12 ر BPS-12	4,
35118 مال	التزميذيب بإسادي ترفيلجدو كمى يحرطهم شده يوداست بمسري أتمرى سكمل بحجر سيحكمن ألماني التجنيحش وكمح مستنع	(PST) ليالي في الحراق	6.
t i	ادار _ = السرائيس السيري (سيكتر لاويتران) كن يحى منظور شده يودار منه بمعدد ومالدا ليولس اليصد فركزان التكويس تسي يحى	BPS-12	
	فتليم شده يوغدو منى ست		

سلیکٹن کریٹریا:اسا تذہ کے سلیکٹر یٹریا درج زیل ہے گل 200 نمبرات کی تقسیم اس طرح سے کی جائیگی تسليركم

1	چس کی مزید هیم اس طرح موک	فليى قابليت = 100 تمبر	100 نمبر ب	ارسکریڈنگ ٹمیےٹ بڈرہے۔ NTS=
	ی بر	هلي تأبليت	ی بر	هليم تابليت
Ľ	ماسل کرده نیر × 20 تنسیم کل میر	ابتساري التجس المرك	ماس کرد دنبر × 20 تحسیم کل نبر	الیں الیمانی
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	ł		مامل کرده فبر × 05 تنسیم کل نبر	

و...: (1) برسکول کار مال کے الم مطحد، مدرن است مرتب کیا جا کی جس جرامید دادوں سے NTS کے ماصل کردہ تمبرادد هلی تالیت سے شہروں کو تک کیا جائے ا-(2) برا **JNTS** دونواست فادم 300 دوب بادت کیا مایک اگرایک امیدداد 5 سکولوں سکرلنے دونواست دیکا تواس سے 800 دوب NTS میادی کرست کار بیک امیدداد خوندنداشت کر بیک المرون المارداردات ، واردار المردومية في كارة شرمستنش سكونت ولمن جارمدو كاموة جاب دودودة المست بفودتين كماجاتيك جكوبي المس في يسفول سك فني جس سكول شرائس فالحاب استددارکاای و تحدیکوش کاستیش باشد. معدا خرود ک سیماکرای و شین توش عرامید دادموجود زماری بلحقد و شین توس سکامید داندن کود مودولها با تکار (2) متا ماتر ریان خالبتا مادشی المادن م Adhoc اور تلو بكون بالك الى مولى المحوكا وكروك ما ويراس بر محفو بك شراقة من مودك من وديد من وديد من كرده اسادة المرقد لمكان (4) اعروبي مدوقت مسيدان ے سے تعدیق کول باعی کی جس سے تام افرادات امیدواروں کو بداشت کرتا ہول ہے - (6) انتروی سے لئے آئے والے امیدواروں کوکوک TAIDA K اميدداردل كى اسادمتعلقه ادار. مرف مترده وقت سراء وقت الدور موسول بو فدال دور تواسون بر تودك جار (8) در و تحقق كما احتيار ماسل ب كده توكوني اجد التركي يا يزون ملدد به الغرائي ملدون محد در (8) اكرس (7)_ اشتبار برد مکومت وقت کا طرف سے بحرتی سے طریقہ کا دیں تبدیلی کی تی توسیقش تمین اس کے مطابق عمل کرنے کی با بند مولک - (10) محک المجمعتو می ایند مسکن کواعتیا دماس اس کا کدد ترا مال آسامین با است کم کامیدد ارم تی کرے۔ (11) ترام تقرریاں حکومت تحییر پختونوا کے میٹرزکرد وقرافی واحیتا کار مطابق خالستا محرت کی بلیاد پر دول کی ۔ (12) جرام تلیک استاد مرف كودمنت سي حليم عده ادارون كا تاعل تول بركى - (13) اكركى اسيددارك اساد على بات من الوال من ماد وجوفى كى جارت كى الدا محمد المحد الت مركاد كالادمت سك التي مان الوجيع الدرام الان الانس بي سيد مان عن المسترويان سند المنارع وديسات الانتي الول كالمنادي بعد ك- (17) اسيدار داي سكول شرمروت كرما بعد كالول عرار الما بعالم الولد ہوکی-(18) آیک اسدواد بیک دقت 5 سکولوں شراغال آسا میوں سے لیے دوخواست در سیکٹا ج سامیدداد سے ایک الک سیسی ایک کا تقریق می آیک سیک عرى جاستاكى موصودت شرسكول سليمش كا اعتزاق العيدادكوهاس فيمرا بلكد المرعران استكافيا فيكاكم نووم وستكوفوني تنك أكم ستستربعدون أوجريت وأسفاصيدوادكونيطي فاعتمل كم ست - (19) درخاست در پرکالم نشد کار مترکار NTS ک دیم سانند پرموجود ب - (20) متعلق آمشان ک خال آسامیدن کاتشیس سکول دانگزوتواست قادم سکرمناهر NTS کرد به ساعت پردک مى ين اود برسكول كاينا كوذويا كياسة -(21) قرام كيدوزكى برسنون به 2% معدودافراد ادر 3% المكينول كاكور يحتق - ب-معدورافراد كود مافرا وكو Standing Medical Board كالبوليكي اقلیت کار کے متعلقہ کوئی کام لیکھید بیش کرناہوکا (21) اکر کی امیددارنے دیگولر پایا تیرت کوئی کمی داخلہ لیاہوکا تواسے تقرم کی کے بعد کلام لگا۔ لادد کام کا اور درکار کے اجازت شک بیٹینے کی اجازت عطارة كار لوت NTS شيرت مي 40 فيدرتبر لي نا خرود كاب - 40 فيسدر الم تم تبر لين دالا ناابل تتسود كما جائيكا ميرسة المست شر شال تبيس جوما -

، داستر ک ایج کیشن آ فیسر (زنان) بنگههایلیمنز کی ایند سیاندری ایجو کیشن شلع جارسده

Phone & Fax No. 091-9220088, 091-6514623

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DEO DEO DEO ورجنا ب 13 درخواست بمراد ابتل) نې کې موربا نہ کرار س پر کے میں طابق دابی L'une lébolisette RET prentts 2 Arabid & William - Com 12 Will Land Stry 2 cion in E cillon = 1 pil E (Honour اعدد الم ال الى عديت ما مع كران المكن أسميرتونى كالطف يمن يوى، د بر أسادة تربي في ا حب سكنة لأرف لكركم فوا مياي سالا كمام - Colo Cul Emplo Eltenour اب ساند آن ی مرب س دوب ایر ELArabic Honews SErvices - E. S. T. مرف لمساليس روحتى كرك المك حرا مك Selected 2 _ اذکر تا حات دع 1/2 ec سائل طالره ای ای زه Phira 13/5/ 13/5/17

Better Copy of the Page No. 13 بحضور جناب DEO صلحبه زنانه سلع جارسده

درخواست بمرادا پیل

جناب عالى!

مود بانہ گزارش ہے کہ میں طاہرہ بی بی نے NTS میں PST کا امتحان دیا تھا جب سائلہ نے پہلا اسٹ چیک کیا تھا اس میں سائلہ کے Arabic Honour کے نمبرات درج نہیں تھے سائلہ نے بروقت ایک عدداپیل آپ کی خدمت میں جمع کرائی لیکن اس پرکوئی کارروائی نہیں ہوئی یہ پتہ اس وقت مجھے چلا جب سیکنڈ لسٹ لگ گیا تو اس میں بھی سائلہ کے Arabic Honour کے نمبرات کی در تکی نہیں کی گیتھی

اب سائلہ آپ کی خدمت میں دوبارہ اپیل کرتی ہے کہ سائلہ کے (Arabic Honour) کے نمبرات میر ٹ لسٹ میں درشگی کر کے سائلہ کواپناحق دیا جائے۔

سائلة تاحيات دعا كورب كى

العارض سائله طاہرہ پی پی دختر شیر محمد یونین کونسل ڈھکی

دستخط انكريزي

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G. No	Name of	Father Name	CNIC No#	Date of Birth	Name o	of School	Total S	Score	Permanent Address	Remarks
; S.No	Teachers . c	1 and 1 and							MAN BAGH KAROONA SABANDI	
· · ·			, · · · · · · · · · · · · · · · · · · ·	09/07/1995	GGCMS D	· .	123.	36 · N	POST OFFICE , MADANI TEHSIL	ÖK
1	SHEHLA YOUSAF	YOUSAF SHAH	17102-0410568-4	09/07/1995				n L	TANGI TEHSIL AND	
				ļ					CHARDADDA	
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	JAMEELA NAZ	AMIR ULLAH KHAN	17102-6082222-4	12/09/1990	Kasharan	··· ·		h	ANGI DISTRICT	· · ·
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125	SUMAIRA	DILBAR KHAN	17102-0836586-8	10/02/1986	GGCMS D	hakki	101.	46 : s	SHERPAO TEH TANGI DISTT CHARSADDA	012
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ύ.	SABA GUL	FIDA MUHAMMAD	17102-7483894-2	01/05/1994 🗠	Killi		100		ANGI DISTRICT	
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	SARA SHAFQAT	SHAFQAT HUSSAIN	17102-9260054-8	12/02/1993	GGPS Aja	b Gul Killi	100.	· .	TEHISL TANGI	or-
	· ·							: \	HARSADDA	ļ
			17102-9046-2	1:/04/1985	GGCMS D	hakki .	100.	04 0	OFFICE DHAKKI DISTRICT	or
	TAHIRA BIBI	SHER MUHAMMAD	1/102-30~ 40-2			· · · · · ·			CHARSADDA, TEHSIL	ļ
	· · · · · · · · · · · · · · · · · · · ·							h	MUHALLAH MAROSIYAN	or
	I LENTA ASHRAF	MUHAMMAD	17102-3572516-0	14/08/1994	GGPS Aja	b Gul Killi	99.8	86° N	POSTOFFICE AND VILLAGE DLANI	on .
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10	MARHABA	SHER MUHAMMAD	17102-6328133-0	11/01/1986	GGCMS D)hakki	98.8	5/`	DISTRICT CHARSADDA TEHSIL	

Cll. DISTRICT POUCATION OFFICER (FEMALE) CHARSADDA ۰,

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Office of The District Education Officer Female Charsadda.

PH No. 091-9220086 Fax. 091-6514623

E-mail emischarsadda.deof@yahoo.com

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APPOINTMENT.

Consequent upon recommendation of the District Selection Committee, & approval of the competent authority appointment of the following female candidates are hereby ordered against the vacant post of (PST) <u>School-Based</u> in BPS-12 (Rs.11140-800-35140) Rs. 11140/- fixed plus usual allowances as admissible under the rules on Contract basis under the existing policy of the Provincial Government, in Teaching Cadre in the schools noted against each on the terms and condition given below in the intresetof public service with effect from the date of their taking over charge :-

		36/0100 101	th effect from the u					
į	S.#	Name	Father's Name	Union Council	CNIC No.	Total Score	Place of posting	Rmarks Against the
					17102-1179159-0		GGPS Ziarat Killi	Vacant Post
	1 -	SABA ZAKIR	ZAKIR ULLAH	Abbzai	1/10= 11/ J=J2= (#	123:64		Against the Vacant Post
•	2	HUMAIRA SYED	SYED HAKIM SHAH	Abbazai	17102-0502871-0	123.64	GGPS Ziarat Killi	Against the
	3	SIDRA	FIDA	Abbazai	17102-2417771-0	114.50	GGPS Head Piran	Vacant Post
			MUHAMMAD HABIB UR REHMAN	Tangi	17102-2166401-4	135.64	GGPS Qilla Tangi	Against the Vacant Post
	4 •	ASIYA HABIB	MUHAMMAD	Tangi 🔬	17102-3896561-0	134.2	GGPS Barazai No.2	Against the Vacant Post
	5	DANISH SABA	IBRAHIM MUHAMMAD		3. 17102-8570812-6	127.2	GGPS Barazai No.1	Against the Vacant Post
	6	KAMAL	KAMAL SHAH MOHAMMAD	Tangin, Tangi	17102-8068913-0	121.07	GGPS Barazai No.1	Against the Vacant Post
	7.	NAWAZ	NAWAZ	Tangi	17102-4456199-4	119.51	GGPS Barazai No.2	Against the Vacant Post
	8	AYESHA •SIDRA TUL	BADEL	Tangi	17102-8559653-8	114.85	GGPS Barazai No.2	Against the Vacant Post
	9	ALLA	ABDUS SATTAR	Tangi	17102-1667605-2	114.64	GGPS Koot Baba	Against the Vacant Post
	10	IJMME HABIBA	AHMAD MUHAMMAD IQBAL	Ghunda	17101-5859571-2	119.89	GGPS Ghunda	Against the Vacant Post
	11	ANUM IQBAL	KHANS S. TP	Karkana Ghunda		116.8	Karkana GGPS Amin Jan	Against the Vocant Post
	12	KOSAR SHAHEEN	MUHAMMAD SADDIQ	Karkana	17201-1805800-6		Killi GGPS Chitral Bali	Against the
	13	NOOR HIDA	WARIS KHAN	Ghunda Karkana	15401-4850647-2	113.28 :	Koroona GGPS Ghunda	Yacont Post
	14.	ARIFA BIBI	SHEHZAD GUL	Ghurda Karkana	17101-1392156-8	113.01	Karkana .	Vacant Post
	15	AFSHAN	ABDUL WADOOD	V Grunda Karkana	16101-6978467-6	108.91	GGPS Ghunda Karkana	Against the Vacant Post
	15 16	NAJMA GUL	MUSTAFA KHAN	Cahunda.	17101-1480280-6	108.10	GGPS Amin Jan Killi	Against the Vacant Post
	17	GUL'NAYAB	MUHAMMAD	Ghunda Karkana	17101-1756158-2	107.62	GGPS Amin Jan Killi	Against the Vacant Post
	18	DURRANI NASIRA	TAHIR ULLAH JAN	Hajizai	17101-0595436-2	118.83	GGPS Mahzara	Against the Vacant Post
		SAEEDA	BAKHTIAR KHAN	Hajizai	17101-5261987-2	113.49	GGPS Mahzara	Against the Vacant Post
	19 20	SABIHA	SULTAN MUHAMMAD	Hajizai	17103-0588774-6	108.3	GGPS Mahzara	Against the Vacant Post
	21	SULTAN SHABANA	YOUSAF ALI	Hajizai	17101-2740763-6	104.03	GGPS Mahzara	Against the Vacant Post
	22	BEGUM	WAHJEED ULLAH	Hajizai	17103-0661106-2		,GGES Mahzara	Against the
í L	23	LAILA RUKH	NASRULLAH KHAN	Hajizai	17103-0665508-2	96.94	GGPS Tarkha	Against the Vacant Past
ľ	2 <u>3</u> 24	AMNA BIBI	la contraction of the second sec	2017 Antima	Shangversenertekt	-SÆc4€d	LEGROTEPON	Against the Vacant Post

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1	•	1	here the			 	<u> </u>	Against the	
•		·	- WY	Hajizai	17103-0621860-0	91.52	GGPS Tarkha	Against the	
	5		MEHBOOB ALI	Hajizai	17101-1232674-0	91.13	GGPS Mahzara	Vacant Post Against the	
2	6		FARID ULLAH	Hajizai	17301-4696065-0	90.76	GGPS Mahzara GGCMS Sheikhan	Against the	
5	7		SAJF UL MALOOK	Hajizai	17103-0601026-2	90.73	Ocho Wala	Vucant Post Against the	
• 2	8	SHUMAILA,	ARAB KHAN		17101-0865152-6	127.87	GGPS Hassanzai	Vacant Past	
-	9	KAUSAR	NAZIR AHMAD	Hassanzai		120.06	GGPS Hassanzai	Against the Vacant Post	
	+	NAZIR NOUSHEEN	MIR BAHADAR	Hassanzai	17103-0645432-6		GGPS Sokhta	Against the Vacout Post	
	10	NAUSHEEN	WAHAB KHAN	Hassanzai	17101-1884713-2	111.43		Acquist the	
:	31	WAHAB	IBRAHIM SHAH	Hassanzai	17301-2288153-6	107.53	GGPS Sokhta	Vucant Post	
1	32	SAMINA NAZ		Hassanzai	17101-3905245-2	106	GGPS Sokhta	Vacant Post	
	33	SHABANA SHAHI	SHAHI KHAN	Hassanzar		105 70	GGPS Sokhta	Against the	
		SUMMAYYA	MAIN JAWAD	Hassanzai [.]	17301-3504763-4	105.72		Apainst the	
-	34	JAWAD	GUL AFSAR SHAH	Hassanzai	17101-4117668-0	105.03	GGPS Sokhta	Agoinst the	
	35	SAIRA AFSAR SAYYEDA	SYED FAROOQ	Hassanzai	17101-8475581-8	104.92	GGPS Kotak	Vocant Post	
	36	ZUBAIDA	SHAH		17101-4965055-4	104.45	GGPS Sokhla	Against the Vocant Post	
	37	NOUSHEN JAN	MEHBOOB UR RAHMAN	Hassanzai		104.03	GGRS Kotak	Against the Vacant Past	
	<u></u> 38	SHEEBA	MUSAMIR SHAH	Hassanzai	17103-0567771-2	99.02 ₁₀	GGRS Kotak	Against the Vacant Post	
•	39	SHUKRIA	AKBAR ALI	Hassanzai	17103-0609411-8	8.	GGPS Hassanzai	Against the Vacant Past	
 ,		MARYAM	MUHAMMAD	Hassanzai	17103-0591072-4	98,73	GULS Hassanzar		
	40	MASOOD	MASOOD			14 A A A A A A A A A A A A A A A A A A A	GGPS Hassanzai	Against the Vacant Post	
		UZMA AKHOON	TILAWAT KHAN	Hassanzai	17101-8260932-2	97.39		Against the	
	41	ZADI		Kanoro	17301-1393279-0	108.66	GGPS Kangra	Vocant Post	·· .
	42	MEENA GUL	SALEEM JAN	Kangra	17101-4492797-0	4	GGPS Kangra	Against the Vocant Post	
	43	FARAH	FAZLI MABOOD	Kangra	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		GGPS Katozai	Against the Vacant Post	•
		·MABOOD SITARA GUL	LAL MUHAMMAD	Katozai	17301-7844773-2	126.07		Against the	
	44		SULTAN	Katozai 🚓	17101-2691947-6	125.15	GGPS Katozai	Vacant Post Against the	
*	45 	ASMA	MUHAMMAD	Katozoai	17101-0606873-4	113.61	GGPS Katozai	Accinst the	1
	46	KAUSAR BIBI	MALANG JAN	Katozai	16101-1633809-2	107.78	GGPS Malak Abad	Against the	
	47	ABIDA BIBI	FAZLE MOULA	Katozai	17101-3063970-6	106.34	GGPS Katozai	·.Vacant Post	İ
	48	SEEMA	ASIF KHAN	The state of the s	1	105.42	GGPS Malak Abad	Against the Vacant Post	l
•	49	SADAF	IZZAT ULLAH	Katozai	17103-0637856-0		GGPS Malak Abad	the state	
		SWAJRA	BASI ULLAH	Katozai	17103-0650578-6	103.25	GGPS Malak Adda GGPS Nazir Ghari	Anglast the	
	50	JAVARIA NAZISH	CTVAR E	Katozai	17103-0610529-4	100.8	Shabqadar	Vacant Post	. ·
r	51	SIYAR	MUHAMMAD		17103-0675058-6	100.68	GGPS Katozai	Against the Vacant Post	ł
	52	SUMBAL	AMAN ULBAH	Katozai		96.18		Against thu Vacant Post	
		NAZRA	SUBTAN MUHAMMAD	Katozai	17101-5656054-4	90.10	GGPS Katozai	Vacant Post	
	53		<u> </u>	· · · · ·		100.00	GGPS Sardar Ali	Against the Vacant Post	1
	54	SARA AKBAR	AKBAR SHAH	Khan Mai	17101-1077429-2	139.39	Killi GGPS Sardar Ali	Apainst the	1
			ATTA ULLAR	Rhan Mai	17101-7197433-0	118.4	Killi	Vacant Post	$\frac{1}{2}$
	55	BIBIZAINAB		*/11-4-	17101-0305202-8	110.12	GGPS Sardar Ali	Against the Vacant Post	
• •	56	BASMEEN GUL	SARBILAND	Khan Mai			Killi GGPS Sardar Ali	Against the	1
		and the second se	YAR MUHAMMAD	Khan Mai	17101-6353194-4	109.56	Killi	Vacant Post	- ·
:	57		· · ,		17101-0888711-2	105.80	GGPS Nazir Abad	Against the Vacant Post	
	58	WAHEEDA	BAKHTIAR ALI	Khan Mai ⁻			Raza Koroona GGPS Nazir Abad	Against the	1
		NISHAT	ZAFAR ALI	Khan Mai	17101-8094385-8	104.07	Raza Koroona	Vacant Post	- · ·
	59 	BEGUM NOSHEEN		Khan Mai	17101-0611903-4	99.12	GGPS Nazir Abad Raza Koroona	Ayainst the Vacant Post	
	60	BEGUM	FAQIR HUSSAIN				GGPS Mir Ahmad	Against the] :
	61	NAGINA BIBI	BADAM ALI	Khan Mai		98.23	Gul Killi	Vacant Post	Staviez
			SYED		- 10 - 10 - 10 - 10 - 10 - 10 - 10 - 10	97.84	001011420	Against the Vacant Post	
• •	62	BASRAN BEGUM	MUHAMMAD	Khan Mai	1/101-024/599-0			Vecant Post	
		1 0 0 0 0 10	WAHID	1	a-Shah-VS-Govt-		-ducation Full	· I	1

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6	3.1	NEENA GUL	BAHADAR KHAN	Harichand	17102-3648126-8	122.39	Abad GGCMS Jamal	Aquinst the
 б.	-+		AYUB KHAN	Harichand	17102-1097740-0	119.5	Abad GGCMS Jamal	Vacant Post
		NASEEM	SALEEM KHAN	Harichand	17102-4672650-6	113.02	Abad GGCMS Jamal	Against the
6		BEGUM	ABDUL MATEEN	Harichand	17102-8312341-6	108.79	Abad GGCMS Jamal	Against the
6			MIAN GUL JAN	Harichand	17102-7275647-6	108.54	Abad GGCMS Jamal	Vacant Post
6	7	311722	JAMSHED KHAN	Harichand	17102-8947803-8	308.09	Ahad	Vocant Post
6	8	JAMSHID		Harichand	17102-6720652-4	107.42	GGPS Saif Ullah Khan Killi	Vacant Post
15	0	HAMID 1	ABDUL HAMID	Shoodag	17102-2414878-8	121.76	GGPS Qamar Khan Killi	Against the Vacant Post
7	0 1	SHAKEELA NAZ	BADAR MUNIR		17102-6338081-4	111.10	GGPS Kudai	Against the
7	71	BUSHRA KHAN	KHAN MALIK	Shoodag	17102-6939017-4	106.71	GGPS Marghan	"Against the Vacant Post
2	72	FARKHANDA	MUHAMMAD	Shoodag Shoodag	17102-3453257-2	103.67	We we we	Against the Vacant Past
2	73	ALIA BEGUM	SAIED HANIF	Shoodag	17102-8371253-0	101.48	GGPS Piran	Against the
121	74	LUBNA AZIZ MUSARAT	AZIZ GUL	Shoodag	17102-3579160-4	100.07	GGPS Mughālu ⁴ «Khan Dheri	Vacant Post
;	75	BIBI -	ZAREEN KHAN ABDUL SAMAD		17102-8747925-4	140.78	GGRS Sherpao Babagan	Against the Vacant Post
;	76 ;	ANILA NAZ		Sherpao		112:282		Against the Vacant Post
• -	77 -	HUMA AZAM	MOHAMMAD AZAM	Mirza Dher	16101-1993583 - 4	A STATE OF STATE	~~~·	
		SUMAIRA		Hisara	17102-1214406-2	109,94	GGPS Firdoos Abad	Against the Vacant Post
	78 •	TABASSUM	AHMAD JAN	Nehree Hisara	17102-5938230-4	105.49	GGPS Firdoos Abad	Against the Vacant Past
	79	NAYAB ALAM	JAN ALAM MUHAMMAD	Nehree	17102-0218726-2	117.47	GGPS Ghafoor Khan Killi	Against the Vacant Past
	80 •	SEHRISH ALAM	SHAHJEHAN	Mandani	1213 No. 191		GGPS Hisara	Against the Vocant Past
-	81	NAEEMA BIBI	SAIF UR REHMAN	Mandani 🔬	17102-6949765-0	115.51	Qandaro GGPS Safo Bari	Against the Vacant Post
-	82	SHAFIA BIBI	ZAHIR SHAH	Mandani	17102-8289180-6	108.47	Band GGPS Shams	Against the Vacant Pos
	83 4	IRUM	JAMSHID KHAN	Ziam	17101-2200581-0	122.44	Abad GGPS Tala Shah	Against the
	84 84	JAMSHID SALMA AZIZ	AZIZ UR RAHMAN	2° Ziam	17102-7595990-8	117.74		Mocont Pos Against the
	85	NAZIA	REDIGUL	Ziam	17102-8741596-8	106.01	GGPS Tala Shah GGPS Saifoor	Vacant Pos
		BEGAM Maryam	Hakeem Khan	Ziam	17102-3132543-6	104.15	Mian Killi	Vacant Pos
	86	Hakeem	IKHTIAR GUL	Matta	17101-5163368-4	125.16	Matta M.M Khel	Against the Vacant Pos
	87	BASEERAT	A State State	Mughal Khel	* · · ·	<u></u>	Rent Rent	
		SAMLA .	HIMAYAT SHAH	Matta Mughal	17102-3019814-4	124.68	GGPS Matta Baro Khel	Against th Vacant Pos
	88	HIMAYAT		Khel Matta	<u> </u>	+	GGPS Daryab	Against th
	89	HIRA GUL	ISMAIL KHAN	Myghal Khel	17101-6746790-2	119.66	Koroona	Vacunt Po
•			MUHAMMAD	XX Matta	17101-1327140-0	116.34	GGPS Matta Palangzai	Agoinst th Vacant Po
	90	HIRA SOHAIL	SOHAIL	Khel	1/103-132/140-0			<u> </u>
	 91	GULALAI	ISMAIL KHAN	Matta Mughal Khel	17101-5572739-2	109.3	GGPS Daryab Koroona	Against th Vocant Po
		SUNDAS	MUHAMMAD	Matta Mughal	17301-7325811-0	.106.92	GGPS Matta Palangzai	Against th Vacant Po
er:	92 	JAMIL	JAMIL	Khel Matta			GGPS Matta	Against th
	93	MEENA GUL	QAZI MUHAMMAD	Mughal Khel	17101-6159330-6	104.11	Palangzai	Vacant Po
		SHAHIDA ISMAII	ISMAIL KHAN	Matta Mughal	17103-0636521-6	102.16	GGPS M.M Khel	Against U Vacant Po
		ISMAIL	1	Khel	-Shah-VS-Govt-K			

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·	25	NELIREEN FIDA	FIDA MUHAMMAD	Matta Mughal Khel	17101-9597199-0	99.34	GGPS Matta Palangzai	Appoinst the Vocumi Post
	36	FAHEEMA	<u>KHAN</u> DAULAT KHAN	Matta 🔅 Mughal	17301-7455615-0	97.92	GGFS Matta Palangzai	Ayainst the Vacunt Post
ه، بيدوا	·	SALMA	GUL FARAZ	<u>Khel</u> Matta Mughal	17101-5512679-2	92.33	GGPS Matta Baro Khel	Against the Vocant Past
	97	FARAZ	BADSHAH	Khel Matta Mughal	17101-6101820-4	91.58	GGPS Matta Palangzai.	Against the Vacant Post
	98 	KALSOOM	BIRADER KHAN	Khel Matta		91.27	GGPS Matta	Against the Vacant Post
	99	ASMA SHAHID	SHAHID GUL	Mughal <u>Khel</u> Matta	17102-0528524-8	91.27	Palangzai GGPS Matta Baro _z i	à Against the
د منطو ر. م	00	SONIA NOOR	MIAN NOOR SHAH	Mughal Khel	17101-2379120-6	90.24	Khel	Vacant Post
	101	SUMAIRA AFTAB	AFTAB UR REHMAN	Matta Mughal Khel	17103-0580725-0	88.92	GGPS M.M.Khel	Against the Stant Post
	02	HASEENA NAZ	ABDUL GHAFFAR	Matta Mughal Khel	17103-0642011-8	88.46	GGPS M.M Khel	Against the Vacunt Post
9 380 9 1	·03	IRUM	NASEER AHMAD	Matta Mughal Khel	17101-2086318-6	87.5	GGPS M.M Khel	Against the Vacant Post
	:04	TAHIRA NAZ	SAIDA JAN	Matta Mughal	17103-0659098-2	76.39	GGPS Matta Baro Khel	Against the Vacant Post
•		ZILE HUMA	FAZLI QAYUM	<u>Khel</u> Matta Mughal	17101-4674512-0	71.2	GGPS M.M Khel	Against the Vacant Post
`. ,	105	SADAF NAZ	IBAD ULLAH	Khel Sarki	17101-5504725-8	125.26	GGPS Lali Koroona	Against the Vacant Post
-	106	WAGMA	MAQSOOD JAN	<u>Tetara</u> Sarki	17101-9567740-0	124.26	GGPS Munir Shah Baba	Against the Vocant Post
t et	107	MAQSOOD		<u>Tetara</u> Sarki " 💐	**************************************	116.72	GGPS Tehbana Kakar	Against the Vocant Past
	108	HUSNA	ZAFAR ALI	Sarki	17101-0278805-0	113.13	GGPS Sarki Tetora	Against the Vocant Post
	109	GULNAZ . ASMA	SHAOUKAT ALI MUHAMMAD	<u>Tetara</u> Sarking	42501-3586037-4	112.2	GGPS Amin Jan Sarki Tetara	Against the Vacant Post
	110	BASHIR SHAHNAZ	BASHIR KHAN d	Telara JSarkj	17301-7953104-0	110.93	GGPS Hayat Gul	Against the Vocant Post
	111 	JAVERIA	GUL ZADA	" «Letara	17101-3863197-8	110.08	Koroona GGPS Anwar Killi	Against the Vacant Post
	112	AMIN	FATHUL AMIN	<u>Tetara</u> Sarki	17101-7520922-2	109.51	<u>Riaz Abad</u> GGPS Dheri	Against the Vocant Post
	113	SUMBAL BIBI AMINA	FAZAL WAHID	Tetara Behlola	17301-5178392-4	127.83	Ghazgi GGPS Muhammad Gul	Against the Vocant Post
	114 	GHAFAR 🥳	MUHAMMAD	Behlola	17101-4650151-0	115.36	Killi GGPS Haji Yar Gul Killi	Against the Vacant Post
	115 	ROOMI GUD	*GHÄNI	Beniola	17101-7482744-8	106.87	GGPS Haji Yar	Against the Vocant Post
	116	TOSEELA ABBAS SAIRA	ABBAS KHAN	Benola (Behlola	17101-6457354-4	103.44	Gul Killi GGPS Haji Yar Gul Killi	Against the Vacant Post
.	<u>117</u>	HUSSAIN TAYYABA	HUSSAIN	Behlola	17101-1470308-0	101.65	Gul Killi GGPS Haji Yar Gul Killi	Against the Vacant Post
	118	GUL. NAILA	ABDUL HAKEEM	Behlola	17101-4485519-6	100.82	GGPS Haji Yar Gul Killi	Against the Vacant Post
	119 120	HAKEEM	GULZAR KHAN	Behlola	17101-9484094-6	100	GGPS Haji Yar Gul Killi	Against the Vacant Post
-	121	GULZAR SHAILA RECUM	NOOR RAHMAN	Behlola	17101-5293444-0	99 <i>.</i> 79	GGPS Behlola Nasafa	Against the Vacant Post
	122	BEGUM. SHABNAM	SHAZADA	Behlola	17101-2001612-2	99.54	GGPS Behlola Bala	Against the Vacant Post
	123	SHAZADA NABEELA	FAZAL MUNIR	Agra	17101-5424466-6	133.7	GGPS Sheikh Killi. Agra	Against the Vacant Post
	124	NASIRA GUL	MURTAZA KHAN WP2287-	Aora 017-Saima-	17101-0277768-6 Shah-VS-Govt-Kr	131.01 SEC-Ed	GGPS Sheikh Killi uCatton-Full	Against the Vacant Post
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 ≥5	DIHA NAZ	FAZAL GHANI	Agra	17101-2223301-2	126.9	GGPS Sheikh Killi Agra	Against the Vucant Post
	SHEHLA YOUSAF				-00.06	GGCMS Dhakki	Against the Vocant Post
201		YOUSAF SHAH	Dhakki	17102-0410568-4	123.36	GGGIIG Dilakki	VICUALIZATI
37 :	SOMAYYA	MUHAMMAD ASLAM	Dhakki	17102-9216539-8	114.64	GGCMS Dhakki	Against the Vacant Post
28	ASLAM SHAZIA	ABDUL AKBER	Dhakki	17102-2563643-8	108.84	GGCMS Dhakki	Against the Vacant Post
29	AKBER SUMAIRA	DILBAR KHAN	Dhakki	17102-0836586-8	101.46	GGCMS Dhakki	Against the Vacont Post
30	NAUSHEEN SABA GUL	FIDA MUHAMMAD	Dhakki	17102-7483894-2	100.3	GGPS Gulshan Hayat Killi	Against the Vacant Post
- 131	SARA SHAFQAT	SHAFQAT HUSSAIN	Dhakki	17102-9260054-8	100.06	GGPS Ajab Gul 💰 Killi	in Against the Vacout Post
132	TAHIRA BIBI	SHER MUHAMMAD	Dhakki	17102-9023646-2	10,0.0 <u>4</u>	-GGGMS-Dhakki-	Abninst Uis
33	LENTA	MUHAMMAD	Dhakki	17102-3572516-0	99.86	GGPS Ajab Gul	Agninst the Vacant Post
	ASHRAF MARHABA	ASHRAF SHER MUHAMMAD	Dhakki	17102-6328133-0	88.87	ÇĞĞČMS Dhakki	Against the Vacant Post
(35)	SHABANA	MUHAMMAD	Behram Dheri	17102-2553470-4	118.32	GGPS islámabad ⇒Dobandi	Against the Vacant Post
136	BIBI AZRA BEGUM	ALI REHMAN	Behram Dheri	17102-2883262-8	\$ 103.19	GGPS Sani Zo Shah	Against the Vacant Post
137	SARA KHAN	MUHAMMAD	Behram Dheri	17102-0926058-6	98,02	GGPS Sani Zo Shah	Against the Vacant Post
1,38	RABIA	IBRAHIM IBRAHIM JAN	Panjpao	17103-0592326-8	98.90	GGPS Sheikh Killi SKF	Against the Vacant Post
139	SHEIKH SHAISTA	MIAN MUQARRB	Panjpao	17103-0578932-8#	92.92	GGPS Sheikh Killi SKF	Against the Vacant Post
140	AMNA GUL	SHAH BASHIR AHMAD	Dosehra	17101-5293124-2	116.44	GGPS Dosehra No.1	Against the Vacant Post
140	SAMINA GUL	KHATTAK SHAHZADA	Dosehrâ	17101-0300448-8	108.9	GGPS Dosehra No.1	Against the Vacant Post
142	SHAISTA DAULAT	DAULAT KHAN	Dosehra	17301-9830031-4	108.65	GGPS Shapano Killi	Against the Vacant Post
143	KHAN SHEHLA	IFTIKHAR UD DIN	Dosehra	17301-7169568-8	106.58	GGPS Dosehra No.1	Against the Vacant Post
143	IFTIKHAR ROHEELA	MUSHTAQ) Dosehra	17101-3872783-4	105,62	GGPS Shah Dhand	Against the Vacant Post
	NAZ RUKHSANA	AHMAD A SHAKIR ULLAH	Dosehra	17101-6006977-8	105.08	GGPS Shah Dhand	Against the Vacant Past
145	NAJMA	MUKHTAR	Dosehra	17101-9029847-4	104.48	GGPS Shah Dhand	Against the Vacant Post
146	BEGUM NASEEM ARA	AHMAD JANAS'KHAN	Dosehra	17101-3653818-2	104.05	GGPS Sheikh Abad Dosehra	Against the Vacant Post
147	RANI	MUKHTAR	Dosehra	17101-2883610-4	103.33	GGPS Risaldar	Against the Vacant Post
148	ANDALIB	AHMED	Doserra	17101-6417386-6	101.63	Killi GGPS Ahmad khan Killi	Against the Vacant Post
149 150	SHAGUFTA	NOOR ALI	Dheri	17101-9272441-6	111.51	GGPS Talab Koroona	Against the Vacant Post
151	ALI NAILA	MUKHTIARALI	Dheri Zardad	17101-7235423-0	111.47	GGPS Dheri Zardad	Against the 7 Vacant Post
152	TABASSUM SHABEENA	HAZRAT ALI	<u>Zardad</u> Dheri Zardad	17101-4371457-6	107.33	GGPS Shad Killi No.1	Against the Vacant Post
- <u></u>	ALI SUMBAL	SHAMSHER	Zardad Dheri	17101-2237203-6	103.15	GGPS Talab	Against the
153	KHAN .	KHAN	Zardad	,		Koroona	Vacant Post
154	SUHAILA . NOOR	NOOR UR RAHMAN	Dargai	15201-7385144-2	126.59	GGPS Safi Ullah Killi	Against the Vacant Post
155	ASMA BEGUM	SHER MUHAMMAD		- 17101-8297213-0	121.65	GGPS Shamilat	Against the Vocant Post
1.56	REEMA GUL	MUHAMMAD SADIQ IBRAR	Chindroo Dag	17102-7699412-4		GGPS Qadeem Abad No.1	Against the Vacant Post
		WP2287-2	017-Saima-S	Shah-VS-Govt-Kp-	SEc-Edu	cation-Full	

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Govt-Kp-SEc-Education-Full Saima-Shah-

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	. I	hery.	An -		r	GGPS Bashir	
 57.	ANJUM	SAHIB ZADA	Chindroo Dag	17101-6485389-8	109.96	Khan Qilla	Against the Vacant Post
3	BEGUM SIDRA ALI	GOHAR ALI	Chindroo Dag	17101-3186420-4	107.47	GGPS Purdal Abad GGPS Amir Khan	Against the Vocant Past
	HAJRA	MISAL KHAN	Chindroo Dag	17101-8531615-4	99.17	GGPS Amir Khan Killi	Against the Vacant Past
9	MISAL SHAISTA	MUNAWAR KHAN	Tarnab	17101-9685762-6	125.92	GGPS Tarnab	Against the Vacuut Post Against the
i0	KHAN	FAZLI RABBANI	Tarnab	- 17101-4988197-0	119.12	GGPS Tarnab	Aquinst the
61	RAHILA NAZ ZEBA GUL	FAZLE RABBI	Tarnab	17301-7664179-4	112.22	GGPS Tarnab	Vacant Post Against the Vacant Post
52	HUMAIRA	ZAFAR ALI	Tarnab	17101-0305679-4	111.29	GGPS Tarnab	Against the
5 <u>3</u> 54	ZAFAR WAJEEHA	ROOH UL AMIN	Tarnab	17101-0774521-8	110.89	GGPS Tarnab	Account Post
5 <u>4</u> 55	MEHNAZ	MUHAMMAD QAMAR	Tarnab	17101-8242121-6	109.78	GGPS Tarnab	Vacant Post
 66	SAJIDA AMIN	AMIN UL HAQ	Sheikho Sardheri	17101-7523874-8	135.43	GGPS Zarin Abad	Against the
67	SAIRA GUL	MUHAMMAD KALEEM	Sheikho Sardheri	17101-6651396-4	124.84	GGRS Zarin Abad GGPS Tawab	Vacunt Post
68	SAIMA HAQ	MATI UL HAQ	Sheikho Sardheri	17101-8340802-2	112.45	Koroona. ÖGPS Satti Abad	Vacant Post Against the
69	HUMAIRA	NAZAR GUL	Mera Prang	17101-7315263-2	136.91		Vacant Past Against the
70	SHAGUFTA	NAZAR GUL	Mera Prang	17101-6526007-0	128,21	GGPS Satti Abad	Against the
71	MARYAM JAVED	JAVED ALI KHAN	Mera Prang	17101-1218770-2	124.73	GGPS Satti Abad	Acainst the
72	MEHWISH JAHANGIR	JAHANGIR KHAN	Mera Prang	17101-84267.67-2	1	GGPS Satti Abad GGPS Satti Abad	Vacant Post Against the Vacant Post
73	CONTRACTOR A	NIAZ KHAN	Mera Prang	17101-0497945-4	108.28	GGPS Fagir Abad	Against the
74		HAMZULLAH KHAN	Mera Prang	17101-47,44031-2	103.03	Majoki GGPS Faqir Abad	Vacant Post Against the
75		TILA MUHAMMAD	Mera Prang	÷17101-0481964-4	101.39	Majoki GGPS Shah Afzal	Vacant Post
76	SABEEHA	NIAZ ALI	Muhammad Naria	17101-3942434-4	126.25	Abad GGPS Shah Afzal	Vacant Post
77	MEHNAZ BEGUM	NASR ULLAH	Muhammad.	1/101 2/30004 -	116.78	Abad GGPS Kulalan	Vacant Post Aquinst the
78	KHALIDA	QASIM KHAN	•Muhammad*	16102-3718826-6	115.19	Mufti Abad	Appliest the
79		GULZAR AHMAD	Nari Nari	17101-2687080-0	109.43	GGPS Mufti Abad GGPS Shah Afzal	Accient Post
80	HIRA TAHIR	MUHAMMAD	Nani <u>Nari</u>	17101-6288491-8	109.05	Abad GGPS Shah Afzal	Vacant Post
181	PALWASHA FAYYAZ	FAYYAZ AHMAD	Muhammad Nari	17101-4756321-4	106.31	Abad GGPS Haji	Vacant Past
82	CHAND BIBI	BASHIR GUL	Muhammad Nari	16102 - 7850929-6	104.29	Shamrooz Khan Killi	Against the Vacant Post
83	RAZIA	KHAN MUHAMMAD	Muhammad Nari	17101-8455778-2	99.43	GGPS Ramtay	Against the Vacant Post
84	4. F	BAHADAR KHAN	Muhammad Nari	17101-7042678-0	98.85	GGPS Shah Afzal Abad	Against the Vacant Post
85	SHAZIA SAIF	SAIF ULLAH JAN	Muhammad Nari	17101-7463695-6	97.45	GGPS Kulalan Mufti Abad	Against the Vacant Post
86	MOBINA TABASSUM	SALEEM JAN	Mera Umarzai	17101-4422668-6	135.07	GGPS Abdul Ghafoor Killi	Against the Vacant Post
87		MUHAMMAD AKBAR	A Mara Umarzai	17101-7442859-2	120.99	GGPS Aman Abad	Against the Vocant Post
88	ASIMA GUL	SANOBAR D. X) MC-2 Shabqadar	17103-0670422-2	105.26	GGPS Shabqadar Fort	Against the Vacant Post
89	AISHA	NASIR KHAN	MC-2 Shabqadar	17101-1773283-8	99.17	GGPS Shabqadar Fort	Against the Vacant Post
90	SHAZIA GUL	JAN MUHAMMAD	MC-2 Shabqadar	17101-3653212-2	98.19	GGPS Yousaf Khan Qilla	Against the Vacant Post
191	HAFSA SAMEEN	SAMEEN KHAN	MC-3 Shabqadar	* 17101-7156166-0	115.06	GGPS Attaki	Against the Vacant Post
92		HAJI SARDAR	MC-3	17101-3509597-0	111.69	GGPS Attaki	Vacant Post

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	REGUM	RAHIM	Shabqadar			OGDC Attaki	Anginet the
-+		AYAZ	MC-3	17103-0617116-0	110.70	GGPS Attaki	Appringt the Vacunt Post
93		MUHAMMAD	Shabqadar MC-з	17103-0579472-6	104.14	GGPS Attaki	Against the Vacant Post
94	SANAM SABA	IBRAHIM	<u>Shabgadar</u> MC-3	17103-0661474-6	97.87	GGPS Attaki	Against the Vacant Post
95	SEEMA RAMBIL	RAMBIL KHAN	Shabqadar MC-1		107.48	GGPS Haleem Zai	Against the Vacant Post
96	SAMINA IBRAHIM	MUHAMMAD IBRAHIM KHAN	Shabqadar	17103-0660898-6		GGPS Rahmat	Against the Vacant Post
.97	KIRAN	KHALID HUSSAIN	MC-1 Shabqadar	17101-4401020-4	93.48	Ullah Khan GGPS Rahmat	Against the
	HUSSAIN SALMA	MUHAMMAD	MC-1 Shabqadar	17101-7726064-4	90.61	Ullah Khan	Vacant Post
<u>98</u>	BEGUM	YOUNAS NOOR	MC-1"	17103-0661121-0	84.17	GGPS Rahmat Ullah Khan	Against the Vacant Post
99	REEMA BIBI	MUHAMMAD	Shabqadar MC-2		131.30	GGPS Mian Killi	Against the Vacant Post
.00	HASEEBA NAZIR	NAZIR UDDIN	Charsadda	17101-2828066-0	131.30	Prang GGPS Prang	Against the
:01	SÀIMA GUL	ABDUL FATAH	MC-2 Charsadda	17101-1240883-4	120.09	Safar Khel GGPS Sadran	Vacant Post
		GUL WALJ	Nisatta	17101-4258927-4	102.22	Nisatta 💫 🐪	Vocant Post
:02	SHAISTA	NIHAR	Nisatta	17101-9583809-0	97.52	GGPS Dagwal Nisatta	Against the Vicont Post
:03	UZMA	MUHAMMAD.			96.57	GGPS Londa	Against the Vacunt Post
:04	ASMA GUL	RAJ ALI KHAN	Nisatta	17101-7633438-8		Nisatta GGPS Dagwal	Against the Vacant Post
 205	BASRAJ	SAID AKBAR	Nisatta	17101-0410721-0	96.56	Nisatta GGPS Dagwal	Anningt the
	BEGUM	SAYED REHMAN	Nisatta	17101-8347654-8	96.15	Nisatta	Vacunt Post
:06	AFSHEEN	KHATIR		17101-1890232-8	94.05	GGPS Dagwal Nisatta	Against the Vacant Post
207	MARIA GHAZNAVI	GHAZNAVI	Nisatta		<u> </u>	GGPS Nazeer Gul	Against the Vocant Post
208	HALEEMA	JAMSHED KHAN	Nisatta	17101-8745365-0	93.13	Koroona GGPS Dagwal	Appinst the
· · ·	BIBI FAIZA	FAZLI HAQQANI	Nisatta	17101-0250546-6	89.48	Nisatta	Vacant Post
209	MAHWISH	QALANDAR KHAN	Nisatta	17101-7166465-6	88.95	GGPS Sheikh Mali Koroona	Against the Vacant Post
210	SOBIA			17101-9001436-6	87.38	GGPS Dagwal	Against the Vacant Post
211	REEMA	KHAN SAHIB	Nisatta			Nisatta GGCMS Wardaga	Against the Vacant Post
212	SHAZLA	SIAM UD DIN	Rajjar-2	17101-1727640-6	120.49	l	Against the
	BEGUM FAIZA GUL	QASIM JAN	en Rayar-2	• 17101-9438662-8	106.42	GGCMS Wardaga	Vacant Post Against the
213	AYESHA	l	B. 1	17101-8197104-0	103.46	GGPS Anis Abad	Vacant Post
214	KAUSAR	91.9	Rojjar-2	16101-9950911-0	102.22	GGPS Hikmat Abad	Against the Vacant Post
215	NADIA AWAN	11100	<u>*</u>			GGCMS	Aguinst the Vacant Post
216	NOREEN GUL	HAKIM KHAN	Rajjar-2	17101-6128876-4	94.67	Wardaga. GGPS Shakar	Acquinst the
	HUMA GUL	MUHAMMAD	Rajjar-2	17101-3129489-6	94.56	Dhand No.2	Vacant Post
217		MUHAMMAD	Rajjar-2	17101-5500081-4	89.22	GGCMS Wardaga	Against the Vacant Post
218	1	TAHIR KHAN		15302-9018163-0	84.66	GGPS Faqir Killi	Against the Vacant Post
219	SAIMA GOUHAR	ZAMIN KHAN	Rajjar-2			Wardaga GGCMS Wardaga	Against the
220	ULFAT	JEHANGIR KHAN	Rajjar-2	17101-8512208-8	82.64	GGCMS Waraaga GGPS Safdar	Vocant Post Against the
·····	JEHANGIR SANA	MEHMOOD OL	Tyrangzai	17101-9959438-8	128.54	Khan Koroona	Vacant Post
221	HASEENA	HASSAN KHURSHEED	Taranyzai	17101-4311122-2	123.64	GGPS Dheri Hamid Mian NO.2	Against the Vacant Post
222	KHURSHEED	MUHAMMAD	11 × 11 - 1			GGPS Dheri	Against the Vacant Post
223	FOZÏA KHAN	ZARDAD KHAN	Arbnyzai	17101-4899625-8	122.46	Hamid Mian NO.1 GGPS Dheri	Against the
224	RABLA BIBI	TEHSEEN ULLAH	Turangzai	17101-2993371-0	120.29	Hamid Mian NO.2	
4 نے ب		MIAN HAFEEZ			134.39	GGPS Rajjar	Against the Vacant Post
225	SHAH RUKH HAFEEZ	ULLAH KAKAKHELI	Rajjar-1	17101-4610573-2		· · · · · · · · · · · · · · · · · · ·	
		MUHAMMAD	Rajjar-1	17101-5033364-6	124.99	GGPS Rajjar	Against the
226	UBAB	HUSSAIN		17101-2206769-2	123.56	GGCMS Sheikh Abod Baiir	Against the Vacant Post
227	HIDAYAT	HIDAYAT ULLAH WP2287	2017-Saima	<i>17101-2206769-2</i> - Shah-∀S-Govt-K	p-SEc-Ec	lucation-Full	

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28	SAIRA BIBI	FASIH UL LISAN	Rajjar-1	17101-7025659-8	113.07	GGPS Rajjar	Against the Vacant Post
20 20 29	SHAHIDA	SULTAN	Rajjar-1	17101-7254061-4	112.75	GGCMS Sheikh Abad Rajjr	Against the Vacant Post
30	MUNIR GUL	MUHAMMAD MUHAMMAD	Rajjar-1	17101-9907242-4	110.12	GGCMS Sheikh Abad Rajjr	Against the Vocant Post
	SHEHZADI	ILYAS WAJID KHAN	Rajjar-1	17101-0475517-4	108.85	GGPS Ghari Kaka Khel	Against the Vocumt Past
-32	ANAM ASMA AMAN	AMANULLAH	Rajjar-1	17301-0946611-6	308.6	GGPS Amir Abad Rajjar	Against the Vacant Post
 	SHABIN GUL	KHAN MUHAMMAD	Rajjar-1	17101-1411577-8	108.54	GGCMS Sheikh Abad Rajjar	Against the Vocunt Post
	MUBEENA	ILYAS ABDUL BASEER	Rajjar-1	17101-2708262-4	106.7	GGCMS Sheikh Abad Rajjar	Against the Vacant Post
:34	GUL HAFSA IBAD	IBAD ULLAH	Rajjar-1	17101-5133995-0	106.54	GGPS Rajjar	Against the Vacant Post
: <u>35</u> :36	BIBI AALIA	SHER AFZAL	Rajjar-1	17101-9917240-8	106.52	GGPS Palato	Against the Vacant Past
 37	AISHA	LIAQAT ALI	Rajjar-1	17101-4599837-8	106.27	GGCMS Sheikh Abad Rajjr	Against the Vacant Post
- <u></u> :38	ABIDA	ASHRAF ALI	Rajjar-1	17101-2920719-0	105.44	GGCMS Sheikh Abad Rajjr	Agoinst the Vocani Post
 ?39	ASHRAF SAWILLAM	HAJI MUHAMMAD ISRAR	Rajjar-1	17101-5383889-6	102.84	GGPS Rajjar	Against the Vacunt Post
240	SABA INAM	INAM ULLAH	Rajjar-1	17101-2820162-4	102.54	GGPS Palato	Against the Vacant Post
 241	ROBI .	MEHER QAND	Umarzai	17101-8626689-6	119.6	"GGPS Sarwar "Abåd	Against the Vacant Post
24.2	HIRA ALI	GOHAR ALI	Umarzai	17101-6136553-8	119.21	GGPS Sarwar Abad	Against the Vacant Past
243	ZAINAB BIBI	FAZAL MALIK	Umarzai	17101-8248732-0	117.11	GGPS Mohallah Saidan	Against the Vacant Post
244	FOUZIA SHAUKAT	SHAUKAT ALI	Umarzai	17101-4591500-8	, 116.54	GGPS Sarwar Abad	Against the Vacant Post
245	MARYAM BIBI	SAHIBZADA MUHAMMAD WASIQ	• Umarzai	17101-7235234-0	113.95	GGPS Umarzai No.2	Against the Vacant Post
246	SARWAT BAGUM	IJAZ AHMAD	Umarzait	17101,6496328-0	11 <u>3</u> .67	GGPS Sarwar Abad	Against the Vacant Post
247	ASMA BIBI	YOUSAF SHAH	Qmarzai	17101-4614178-6	112.65	GGPS Khyberi Koroona	Against the Vacant Post
48	NAZISH RAHMAN	ABDUR RAHMAN	Utimanzai	17101-5797149-2	130.65	GGPS Utmanzai	Agoinst the Vacant Post
49	SHAKEELA NAZ	ZAITUBLAH	[©] Utmanzai	17101-8934797-4	129.67	GGPS Utmanzai	Against the Vacant Post
50	AFSHAN AMIN	NOORULAMIN	Utmanzai	17101-7609109-4	126.42	GGPS Pareech Khel	Against the Vacant Post
251	SHABANA 4	MUHAMMAD HUSSAIN	Utmanzai	17101-2059403-0	125.24	GGPS Utmanzai	Against the Vacant Post
52	SUNAILA SAEED	MASQOD UR RAHMAN	Utmanzai	. 17101-8797547-8	123.69	GGPS Utmanzai	Against the Vacant Post
53	FAIZA BIBI	MISBAH ULLA	Utmanzai	17101-4053103-0	123.62	GGPS Jehangir Abad	Against the Vacant Post

TERMS & CONDITIONS. J.

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NO TA/DA etc is allowed. Charge reports should be submitted to all concerned in duplicate.

Appointment is purely on temporary & contract basis initially for one year w.e.f 19th May 2017 to 18th May 2018.

Her should not be handed over charge if she exceeds 35 years or below 18 years of age.

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Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned) Any one found producing bogus Certificate will be reported to the law enforcing agencies for further action. Her services are liable to termination of offer month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.

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Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that her certificates are verified.

She should join her post within 15 days of the issuance of this notification. In case of failure to join Her post within 15 days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.

Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge. She will be governed by such rules and regulations as may be issued from time to time by the Govt. Her services shall be terminated at any time, in case her performance is found unsatisfactory during her contract period. In case of misconduct, she shall be preceded under the rules framed from time to time.

Their appointment is made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.

Before handing over charge once again their document may be checked if they have not the required qulifications they may not be handed over charge.

(MST: SOFIA TABBASUM) District Education Officer Female Charsadda.

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Endst: No.: 3663-75

Pesnawar. PA to Director Government of Khyber Pakhtun Khwa E&SE Department Peshawar. PA to Director Government of Knyver A summer PA to Chairman DDAC Charsadda. PA to Deputy Commissioner Charsadda. PA to District Nazim District Government Charsadda. District Monitoring Officer Charsadda 4

- 5. 6.
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- PA to District Nazim District Government C
 District Monitoring Officer Charsadda
 District Accounts Officer Charsadda
 All District Selection Committee Members,
 SDEO (Female) Charsadda.
 SDEO (Female) Shabqadar Fort,
 SDEO (Female) Tangi.
 All Official Concerned.

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- 15. B&AO local office.
- 16. Cashier/Accountant Lo 16. M/File

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District Effection Officer Female Charsadda.



OFFICE OF THE DISTT: EDUCATION OFFICER (M) DIR LOWER

ENQUIRY AGAINST DEO (F) CHARSADDA IN THE LIGHT OF COMPLAINT LODGED BY MST.SAIMA SHAH OF UC DHAKKI DISTRICT CHARSADDA

By <u>DR. HAFIZ MUHAMMAD IBRAHIM DEO (M) DISTT: DIR LOWER</u> Appointed as Enquiry Officer by Director E&SE Vide Endst: No 6539-41/F.Ne 45/Appeal Charsadda Dated Peshawar the 31/10/2017(Annex-A-1 & A-2)

HISTORY OF THE CASE

Briel history of the case is as under:

- 2 South Salima Shoh D/O Sabit Shan R/O Village and UC Should District Chartadda, wherein she has stated that she had applied for the post is 291 Inrough NTS. Her name was at S.No 8,10 & 25 of the most kill chart score of 98.84. Ten(10) posts were advertised in UC should
- A score of value, rentrop possively databased at score at 96.77
 Another candidate whose ment was below her with a score at 96.77
 and whose ment position was at S.No 11,16 & 31, was inserted into final merit list and her score was enhanced.
- She has also stated that by inserting Mst. Tahira Bibi D/O She replacement into merit list, her right of appointment seems to be worked and she will be deprived of her right, if Tahira Bibi is accounted. (See annex-A-2)

PROCEDUR

To probe into the matter and to find the reality the undersigned directed Mrst Solia Tobbosum DEO (F) Charsadda vide No 14787 dated 13/11/2017 to provide all the relevant record to the undersigned within lively days of the receipt of this lefter.(Annex-B-1 & B-2)

Wiffen no response was received from her end, she was again imported vide letter No 15369 dated 29/11/2017 that the undersigned was attend, her office on 30/11/2017 in connection, with the geotementioned inquiry. She was further directed to more her presence sere in her office along with all the concerned officials. She was directed by provide the following record pertaining to said inquiry.

Advertisement

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OFFICE OF THE DISTRICT EDUCATION OFFICER (M) DIR LOWER.

ENQUIRY AGAINST DEO (FEMALE) CHARSADDA IN THE LIGHT OF COMPLAINT LODGED BY MST. SAIMA SHAH OF UC DHAKKI DISTRICT CHARSADDA.

BY

DR. HAFIZ MUHAMMAD IBRAHIM DEO (M) DISTT: DIR LOWER Appointed as Enquiry Office by Director E&SE Vide Endst: No. 6539-41/F.No. 45/Appeal Charsadda dated Peshawar the 31/10/2017 (annexure-A-1 & A-2

Brief history of the case is as under:

- Mst. Saima Shah D/o Sabit Shah R/o Village and UC Dhakki Distirct Charsadda, wherein she has stated that she had applied for the post of PST through NTS. Her Name was at S. No. 8, 10 & 25 of the merit list a score of 98.84. ten (10) posts were advertised in UC Dhakki.
- Another candidate whose merit was below her with a score of 96.77 and whose merit position was at S. No. 11.16 & 31, was inserted into final merit list and her score was enhanced.
- She has also stated that by inserting Mst. Tahira Bibi D/O Sher Muhammad into merit list, her right of appointment seems to be violated and she will be deprived of her right if Tahira Bibi is appointed (See Annexure-A-2)

PROCEDURE

To probe into the matter and to find the really the undersigned directed Mrs. Safia Tabbasum DEO (F) Charsadda vide No. 14787 dated 13/11/2017 to provide all the relevant record to the undersigned within three days of the receipt of this letter.

When no response was received from her end she was again informed vide letter No. 15369 dated 29.11.2017 that the undersigned will attend her office on 30.11.2017 in connection with the aforementioned inquiry. She was further directed to make her presence sure in her office along with all the concerned officials. She was directed to provide the following record pertaining to said inquiry.



- List of Vacant Posts in UC Dhakki Tehsil Tangi.
- Tentative merit list of the concerned UC. Attendance record of interview/checking of documents.
- Final merit list.
- Documents of Tahira Bibi D/O Sher Muhammad.
- Documents of Saima Shah D/O Sabit Shah.
- Formation of DSC.
- Minutes of DSC meeting,
- Your own statement regarding this case. (Annex-C)

Mst: Saaima Shah D/O Sabit Shah R/O UC Dhakki Tehsil Tangi was:also informed to be present on that mentioned in the letter vide Endst: No 15370-71 dated 29/11/2017 (See annex-B-2) The undersigned along with Mr. Dawa Azim Khan Supdit: Office of the SDOE(M) Timergora visited office of the DEO(F) Charsadda. Mrs. Sofia Tabbasum DEO (F) Charsaddo was present along with her staff members. Mst: Saima Shah (the complainant) was also present.

Both the parties were heard in person and were asked to record their written statements, which were obtained from both of them on the spot.

STATEMENT OF MRS: SOFIA TABBASUM DEO(F) CHARSADDA

Statement of Sofia Tabbasum DEO (F) Charsadda is reproduced below for ready reference:

'TO

Mr Dr Hafiz Muhammad Ibrahim

District Education Officer (M) Dir Lower (Inquiry Officer)

Subject:

STATEMENT IN THE LIGHT OF COMPLAINT LODGED BY SAIMA SHAH D/O SABIT SHAH CHARSADDA Kindly refer to the subject cited above and to submit that theappointment of

Miss Tahira Bibi D/O Sher Muhammad appointed as PST through NTS at UC Dhakki Distt: Charsadda in 2017 was made purely on merit through a proper procedure (Scrutiny, DSC) and no one has been deprived of the right of appointment in the said UC

Furthermore a Departmental Selection Committee was constituted for scrutiny of documents. NTS merit list and finalization of Appointments in the subject case, The worthy Director E&SE also nominated DEO (F) Peshawar as his office representative in the said DSC, all and everythind is on record of this office please. Dated: 30th November, 2017

DISTRICT EDUCATION OFFICER FEMALE DISTRICT CHARSADDA" (Annex-D)

STATEMENT OF MST. SAIMA SHAH D/O SABIT SHAH UC DHAKKI CHARSADDA Statement of Salma Shahl the complainant) written in Urdu, was also obtained wherein she stated that she had applied for the post of PST through NTS. Her name was in the merit list with a score of 98.84. Another candidate whose merit was below her with a score of 96.77.





that all her documents may be checked and verified please. Signed by Saima Shan and attested by DEO (F) Charsaddia. (See Annex-b)

FRUSAL OF MILLORD

the following documents/record was checked on the spot and periods a with posts of PST were odvertised properly in leading newspapers.

- (Annex-F) A contractive merit list was available. (Annex-G-1 to G-11)
- Encol merit list was also checked and annexed. (Annex-H-1 to H-10) eventric) Selection Committee was properly constituted and minutes of the
- eting along with its recommendations were also available or record.
- the anination of the representative of Director Elementary and Sacondary - ducation Knyber Pakhlunkhwa was also found on record.(Annex-J) endepointment order of eligible condidates was also found available on
- use ord which is attached herewith for ready reference.
- (Annex K-1 to K-9) and appointment order of left over cases was also checked.
- (Annex-L-1 io L-2) entigendum order removing mistakes in the previous order was also
- mollable on the file. (Annex-M) the accuments of all the candidates were found present in office which were
- Documents of Mst: Saima Shah, Mst: Tahira Bibi and Mst: Muserrat Begum r necked on the spot. were obtained from the office and are ottached to the inquiry report. (Annex-N-1 to N-8, O-1 to O-10 & P-1 to P-10)

FINDINGS/CONCLUSION.

From the personal hearing, perusal of the record and statements of the The undersigned observed the following points:hli conó/

the complaint of Mst. Saima Shah D/O Sabit Shah seems paseless as all the appointments were mode in accordance with the policy of the prevancial J.

and no molotide intentions were found. as a posts of PST were advertised in UC Dhakki and ten persons were

a pointed purely on merit. It : a fact that Mst: Tahira Bibi D/O Sher Muhammad was below mentiond the she produced equivalency certificate from the inter boards committee of Choirmen for FA. The sold equivalency certificate was transented before the DEO (F) Chorsaddo after due date for the submission of applications i.e. 30/09/2016 but prior to the issue of appointment order. The date of its see west 7/03/20).7 and the orders were issued on 19/05/2017

end Shanderful Khassa certificates, which were Mst: Johno Blownood two on Shandalur khassa certificates, which were obtained in 2005 and 2013, respectively and thus she was eligible for (Seelopnex:Or Mst: JohnOrBle acquiring equivalency certificate from IBBC as per the rules

dito

PERUSAL OF RECORD

The following document/record was checked on the spot and perused

- The posts of PST were advertised properly in leading newspaper
- ✤ Tettive merit list was available.
- ✤ Final merit list was also checked and annexed.
- District Selection Committee was properly constituted and minutes of the meeting along with its recommendations were also available on record.
- Nominator of the representative of Director Emergency and Secondy Education Khyber Pakhtunkhwa was also found available on record which is attached herewith for ready reference.
- Second appointment order of left over cases was also checked available on the file.
- Documents of all the candidates were found present in office which were checked on the spot.
- Documents of Mst. Saima Shah, Mst. Tahira Bibi and Mst Musarrat Begum were obtained from the office and are attached to the inquiry report.

FINDINGS/CONCLUSION.

From the personal hearing, perusal of the record and statements of the all concerned, the undersigned observed the following points:-

- 1. The complaint of Mst. Saima Shah D/o Sabit Shah seems baseless as all the appointment were made in accordance with the policy of the provincial Govt and no malafide intentions were found.
- 2. Ten posts of PSTwere advertised in UC Dhakki and ten persons were appointed purely on merit.
- 3. It is a fact that Mst. Tahira Bibi D/o Sher Muhammad was below merit and then she produced equivalency certificate from the inter Boards committee of Chairman for FA. The said equivalency certificate was presented before the DEO (F) Charsadda after due date for the submission of applications i.e 30.09.2016 but prior to the issue of appointment order. The date of its issue was 7.03.2017 and the orders were issued on 19.05.20174.
- 4. Mst. Tahira Bibi had FA and Shahdatul Kassa certificate, which were obtained in 2005 and 2013 respectively and thus she was eligible for acquiring equivalency certificate IBBC as per the rules.

- 5 Mrtt Saima Shah D/O Sabit Shah and Mstt Musarrat Begum D/O Sabit Ali has and the same score i.e 98.84, sc if Mstt Tahira bibl is dropped from the aberit list and her appointment order is cancelled, even then Mstt Saima Shah does not stand on merit because score of Mstt Saima Shah D/O Sabit Shah and Mstt Musarrat Begum D/O Sabit Ali is one and the same i.e 98.84. (See annex-H-4)
- 6. As per the rules if the score of two condidates remains the same, then appointment can be made on the basis of date of birth. The date of birth of Mst: Saima Shah is 12/02/1995 and that of Mst: Musarrat Begum is 05.03/1987. SO on the basis of Date of birth Mst: Musarrat Begum is eligible for appointment.
- Similarly it appointment is made on the basis of their names on alphabetical order, even then Mst; Musarrat Begum stands first and Saima Shah after her.

RECOMMENDATIONS -

Keeping in view the above mentioned facts, it is recommended that:

- As the appointment order of all PSTs has been issued in accordance with merit and no malafide intentions were observed, so all the appointees may be retained and none of them may be dropped being ineligible for appointment.
- The complaint of Mst: Saima Shah D/O Sabit R/O UC Dhakki Tehsil Tongi District Charsadda may be filed being baseless and contradictory to ground reality.
- The report is being submitted for further necessary action prease.

Dr. Hafiz Mahammad Ibrahim DEO(M) Dir Lower (Inquiry Officer)

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- 5. Mst. Saima Shah D/o Sabit Shah and Mst. Musarrat Begum D/o Sabz Ali has one and the same score i.e 98.84, so if Mst. Tahira Bibis is dropped from the merit list and her appointment order is cancelled, even then Mst. Saima Shah does not stand on merit because score of Mst. Saima Shah D/o Sabit Shah and Mst. Musarrat Begum D/o Sabz Ali is one and the same i.e 98.84.
- 6. As per the rules if the score of two candidates remains the same, then appointment can be made on the basis of date birth. The date of birth of Mst. Saima Shah is 12.02.1995 and that of Mst. Musarrat Begum is 06.03.21987. so on the basis of Date of birth Mst. Musarrat Begum is eligible for appointment.
- 7. Similarly if appointment is made on the basis of their names on alphabetical order, even then Mst. Musarrat Begum stands first and Saima Shah after her.

RECOMMENDATIONS:-

Keeping in view the above mentioned facts, it is recommended that:

- As the appointment order of all PSTs has been issued in accordance with merit and no malafide intentions were observed, so all the appointees may be retained and none of them may be dropped being ineligible for appointment.
- The complaint of MST. Saima Shah D/O Sabit R/o UC Dhakk Tehsil Tangi District Charsadda may be filed being baseless and contradictory to ground reality.
- The report is being submitted for further necessary action please.

Dr. Hafiz Muhammad Ibrahim DEO (M) Dir Lower (Inquiry Officer)

INQUIRY REPORT

FACT FINDING ENQUIRY CONDUCTED IN PURSUANCE OF GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT NOTIFICATION NO. SO (S/F) E&SE/4-17/2018/MST. SAIMA SHAH/CHARSADDA DATED DECEMBER 12TH, 2018. REGARDING MANUPULATION IN THE PST MERIT LIST BY THE DEO (F) CHARSSADDA IN THE YEAR 2016 AND IGNORED HER FROM THE POST OF PST BY APPOINTING MST. TAHIRA BIBI AGAINST THE POST OF PST

CONDUCTED BY

1. MR. GOHAR ALI KHAN (BS-20),

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DIRECTOR DIR ECTORATE OF CURRICULUM AND TEACHEREDUCATION KHYBER PAKHTUNKHWA, ABBBOTTABAD

2. MR. MUJEEB-UR-REHMAN (BS-17) SECTION OFFICER E&SE DEPARTMENT PESHAWAR

INQUIRY REPORT

FACT FINDING ENQUIRY CONDUCTED IN PURSUANCE OF GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT NOTIFICATION NO. SO (S/F) E&SE/4-17/2018/ MST. SAIMA SHAH/CHARSADDA DATED DECEMBER 12TH, 2018. REGARDING MANUPULATION IN THE PST MERIT IN THE YEAR, 2015 AND IGNORED HER FROM THE POST OF PST BY APPOINTING MST. TAHIRA BIBI AGAINST THE SAME POST.

The E&SE Department Government of Khyber Pakhtunkhwa, Peshawar was pleased to appoint the Inquiry Committee Vide Order No. So (S/F) E&SE/4-17/2018/ Mst: Saima Shah/ Charsadda Dated December 12th 2018; (Annexed-A) to conduct fact and finding enquiry in to the manipulation in the PST. merit in the year 2016 and ignored her from the post of PST by appointing Mst. Tahira Bibi agains! the same post.

INQUIRY PROCEEDINGS

- Accordingly, we look upon the task and visited DEO (F) Office on and collected the record. We perused 1.
- The Inquiry Committee also wrote letter to Establishment Department for obtaining guidance regarding inclusion of Honor Arabic certificate after due date of submission of applications vide letter No. SOG/E&SE/1-25/2019 dated 18.01.2019 (Annexed-B).
- The Establishment Department vide letter No. SOR-I(E&AD)2-3/2018 dated 07.01.2019 did not advised rather asked for submission of Findings of the Inquiry Committee.
- The Inquiry committee at her own also tried its best to get evidence based document either in shape of instructions or rules to know whether the District Selection Committee was empowered to accept or reject the appeal regarding inclusion of Honor Arabic certificate after expiry of last date for submission of applications forms. But unable to find it, hence the question of acceptance or rejection remained unresolved.
- A. ISSUE/CHARGES:
- Mst. Saima Shah d/o Sabit Shah of village Sahib Gul Mohallah and P.O Dhaki a candidate for the post. of PST advertised by the DEO (F) Charsadda claims through her father Mr. Sabit Shah, that according to the first merit list prepared by NTS authorities she was at S. No. 8 with an academic score of 98.84.) while Mst. Tahira Bibi d/o Sher Mohammad was at S. No 11 with a score of 96.77.
- b. Mst. Saima Shah Claims that Mst. Tahira Bibi at the time of submission of her application to the NIS has submitted her HSSC certificates with obtained marks of 523/1100, while later on after due date she submitted Honor Arabic with three subjects at HSSC level with obtained marks 703/1180 with an equivalency to HSSC from the IBCC. Due to the consideration and admittance of this certificate by the District Selection Committee, the score of Mst. Tahira Bibi rise from 96.77 to 100.04 and stood at S # 8.
- c. Mst. Saima Shah claimed in her application that the District Selection Committee Charsadda was not competent to include the certificate of Honor of Arabic with obtained marks of 703/1100 and declared equivalent to HSSC by the IBCC in r/o Mst. Tahira Bibi in the merit list after the last date of submission of applications.
- REQUIREMENT AND FULFILLING OF CODAL FORMALITIES FOR APPOINTMENT OF LEGAL В. PST POSTS:
- According to Rule ((4) sub Rule (3) Section (b) sub section (ii), of the Appointment, Promotion and According to Rule ((4) sub Rule (a) Section (b) sub section (a), or the appointment, a product and Transfer Rules 1989, the District Education officer if declared as appointing authority by the Director E&SE being head of the attached Department under Rule (23) of Scheduled-1 of the KP Government 1. Rules of Business, 1985 is competent to appoint officials in BS- 1 to BS-15 in the District Cadre ...
- The District Education officer shall carry out the appointments against the vacant positions on the recommendations of the District Selection Committee notified by the Establishment Department and endorsed by the E&SE Department (Copy annexed as "B") in its meeting held on 09-05-2017.
- The District Education shall advertise the available vacant positions at least two leading newspapers, which is also done and (copy annexed as "C").
- C. FINDINGS:
- The DEO (F) Charsadda has advertised the vacant position of PST (BS-12) and the last date for submission of application was fixed as 30-09-2016 (copy annexed as "D").

NTS has conducted the written test and a tentative merit list was made available on the notice board of the o/o the DEO (F) for perusal of the applicants and inviting appeals if any against the merit (copy

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- In the tentative merit list the score of Mst. Saima Shah was 84,84) and was at S. No 8, while Mst. Tahira Bibi d/o Sher Mohammad was at S. No 11 with a score of 95.77 iń.
- Mst Tahira Bibi submitted an appeal to the DEO (F) with the request to include her certificate of Honor of Arabic with obtained marks of 703/1100 with an equivalency to HSSC by the BCC (copy annexed as iv
- Mst. Tahira Bibi has passed Honor of Arabic examination from BISE Peshawar in session 2013 (supplementary) under Registration No 28-B/AR-2013 (Copy annexed as "G"), but at the time of supmission of application has not attached this certificate.
- vi. The appeal of Mst. Tahira Bibi was placed before the District Selection Committee in its meeting held on 09/05/2017 for consideration. The DSC accepted the appeal of Mst. Tahira Bibi and included her certificate of Honor of Arabic with obtained marks of 703/1100 in the final merit list; hence her score was rise to 100:04 and she come to S. No 8 from S. No 11 of the merit list (copy annexed as "H"),
- Mst, Saima Shah also made appeal to the Director, Directorate of E&SE KP, Peshawar being appellant authority in the case. The Director has ordered an inquiry vide Endst. No 6539-41/F. No 45/Appeal Charsadda dated 31st October 2018. The Enquiry Officer has submitted his report (Annexed as "I"), where in the Inquiry Officer has declared the appointment according to the rules and meril
- viii. Not satisfied with the recommendations of the I. Report Mst. Saima Shah then instituted a W/P in the Peshawar High Court Peshawar, which is pending for decision before the honorable court.

D. RECOMENDATIONS:

- The Prescribed qualification for the post of PST was F.A F.Sc under the services rules. As Mst. Tahira Bibi has passed HSSC Examination and obtained 523/1100 marks in HSSC (A) Examination 2005. L. hence in the presence of prescribed qualification, the District Selection committee was not supposed to accept the equivalent certificate of Honor of Arabic qualification passed in (S) 2013 and that too at the belated stage i.e. after the due date and even the preparation of merit list.
- The case of Mst Saima Shah Candidate for the post of PST from U/C Dhaki Charsadda may be placed before the District Selection Committee for reconsideration and further decision as per services rules of. the post in the field at that time.

Inquiry Officers:

GOHAR ALI KHAN (BS-20) Director, DCTE, KP at Abbottabad

46. MR. MUJEEB-UR-REHMAN (BS-17) SECTION OFFICER E&SE D

Dated: April 14th, 2019

PESHAWAR HIGH COURT, PESHAWAR. BEFORE THE W.P. No. 2287 dixal, Village Saima Shah D/o Sabit Shah R/ocanit (Petitioner) Council Dhakki, Tehsil Tangi, District, VERSUS 1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Civil Secretariat, Peshawar. 2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Near Government Higher Secondary School No. 1, G.T. Road, Peshawar. 3. District Education Officer (Female) Charsadda. 4. Tahira D/o Sher Muhammad R/o Dhakki, Tehsil Tangi, District Charsadda.....(Respondents) WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973, TED Court PRAYER: On acceptance of this Writ Petition, the respondents may be directed to appoint the petitioner

FILID TODAY Deputy Registrar

as petitioner is suitable candidate as per merit list, for the post of P.S.T in the relevant Union Council.

Respectfully Sheweth:

The petitioner submits as under:

1.

2.

3.

That the petitioner is the law abiding citizen of Pakistan and belongs to District Charsadda. (Copy of CNIC and Domicile Certificate are attached as annexure "A").

That respondent No. 3 advertised different posts including PST in Education Department. (Copy of advertisement is attached as annexure "B").

That the test for the above mentioned posts was conducted through NTS in which petitioner after submitting of Application Form, appeared in the test.

4.

That petitioner after appearing in test, have qualified the test of PST and secured 98.84 marks and was placed at Serial No. 10 of the final Merit list

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ΈD EXAMINER Peshawar High Court

prepared by the NTS and Education Department (Copy of merit list is attached as annexure "C").

That the petitioner is highly qualified from the respondent No. 4. (Copies of educational documents are attached as annexure "D").

5.

б.

7.

8.

That after fulfillment of required qualifications, petitioner here waited for appointment letter, but surprisingly his appointment was proved to be a dream and respondent No. 4 was appointed which have secured less marks from the petitioner on the basis of political affiliation/approach. (Copy of appointment order dated 19/05/2017 is attached as annexure "E").

That the respondent No. 4 was shown at Serial No. 32 of the appointment letter and the petitioner nowhere stand in the appointment letter.

That petitioner have approached to respondents and submit an application on the ground that the appointment order of the respondent No. 4 is share violation of the merit list prepared by them, in vaip?

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WP2287-2017-Saima-Shah, S-Gov-Kaj Ec-Education-Feleshawar High Court

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due to political pressure. (Copy of application is attached as annexure "F").

That respondents give deaf ear to the application of the petitioner, hence invoked jurisdiction of this Hon'ble Court through instant Writ Petition on following grounds amongst others:

GROUNDS:

Α.

9.

That petitioner have qualified the test of NTS and secured high marks and petitioner is most suitable candidate for appointment.

В.

C.

That refusal of respondents not to appointment the petitioner and appointed the respondent No. 4 who secure less marks from the petitioner as well as on serial No. 11 while the petitioner is on serial No. 10 of the merit list, which is against the principle of natural justice.

That the refusal of the respondents is also violation of Article 25 of the Constitution of Islamic Republic of Pakistan, 1973 which grant rights of profession to every citizen of Pakistan. FILED FODAY

26 MAY 2017 WP2287-2017-Saima-Shah-VS-Govt-Kp-SEc-Education-Full

Deputy Registrar

EXAMINER eshavar High Court That if petitioner is not appointed, it will amount to discrimination which is against the fundamental rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.

E.

D.

That the respondent No. 4 submitted a Madrassa Certificate at the time of issuing the appointment orders which is not required in the advertisement and grace marks were given to the respondent No. 4 on this pretext and was included in the merit list on the basis of this factitious and bogus Madrassa Certificate.

That actions and inactions of the respondents are highly deplorable, illegal, unconstitutional and -unlawful which has caused grave miscarriage of justice to the petitioner. Moreover, the respondents appointed unsuitable candidates for the above mentioned posts which will further deteriorate.

G. ;

F.

That the concerned authorities of District Education Officer Charsadda is involved in appointing

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WP2287-2017-Saima-Shaf-VS-Govt-Kp-SEc-Education-Full

Deputy Registrar

unsuitable persons at the cost of qualified and legible candidates for some ulterior motives.

Any other ground will be raised at the bar during the course of arguments with the prior permission of this Hon'ble Court.

H.

It is, therefore, humbly prayed that on acceptance of this Writ Petition, the respondents may be directed to appoint petitioner for the post of PST, as petitioner as more qualified and deserving candidate for the post mentioned above.

And the appointment of respondent No. 4 may kindly be declared as illegal, unlawful, void-abinitio, and without merit.

Any other relief, which not specifically asked for, may also be granted to the petitioner, keeping in view the facts and circumstances of the instant Writ Petition.

ah Court

FILED TODAY 26 MAY 2037

INTERIM RELIEF:

By way of interim relief, the respondents No. 3/ District Education Officer (F) Charsadda be restrained to give charge to the No. 4 as PST in GGCMS, Dhakki, Charsadda, till the final decision of the instant Writ Petition.

&

Petitioner

Peshawar.

Mill

Syed Akbat Ali Shah

Advocates High Court,

Khiyal Muhammad Mohmand

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Through

Dated: 25/05/2017

ATTESTED

Peshawar High Court

FILED TODAY Deputy Registrar 26 MAY 2017

CERTIFICATE:

It is certified by no such like Writ Petition has early been filed by the petitioner in this Hon'ble Court. Further stated that being Writ Petition on the score that since there is no adequate and alternate remedy is available or previously avail or approach lower forum, thus this case may fixed before the Worthy Division Bench (D.B) of this Hon'ble Court.

LIST OF BOOKS:

 Constitution of Islamic Republic of Pakistan, 1973.

2. Any other law books according to need.

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26 MAY 2017 4

IGH COURT PESHAWAR

IGH COURT FORM "A"

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ORDER SHEET

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signingre of Judge or that of ' parties or counsel where necessary
1	2	
	24.9.2019	WP No. 2287-P/2010 14 33
		Present: Syed Akbar Ali Shah, advocate for petitioner. Mr. Arshad Ahmad, AAG alongwith Mudassir Shah, ADEO Litigation, Charsadda. Mr. Zartaj Anwar, advocate for
		respondent ZNo.4. *****
		<u>ROOH-UL-AMIN KHAN, J</u> Through the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973
		petitioner seeks issuance of an appropriate writ to direct the respondents to appoint her as Primary School Teacher (PST) as she is more qualified and
		deserving candidate, whereas the appointment of
	Loo wo	respondent no.4 be declared as illegal, unlawful and void-ab-initio and without merit. 2. The grievance of petitioner is that, in pursuance of advertisement for filling up different

Possia War High Court

posts including the post of PST, the petitioner alongwith other candidates applied for the same. After conducting test and interview the petitioner secured 98.84 marks and was placed at serial no. 10 of the final merit list, but the respondent No.4 despite securing less marks having less qualification, has been appointed.

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During arguments counsel for the 3. parties relied on two different inquiries conducted by different entities i.e. District Education Officer (M) and Director DCTE, KP Abbottabad respectively. In former inquiry the appointment of petitioner was justified by holding that she was granted 100.04 marks including the marks of Shahadat Ul Khasa, after proper verification from the Inter Board Committee of Chairmen (IBCC), whereas in the latter inquiry the inquiry committee without associating the respondent No.4 while referring the case to D.S.C for reconsideration has observed that the authority has illegally accepted equivalency certificate of Honour of Arabic qualification passed in 2003 that too at the belated stage.

The observation mentioned in Para-I

4.

MINER High Cou

of the order dated 13.5.2019 passed by the worthy Secretary being without hearing of the respondent No.4 is prejudicial to her interest, hence the same are expunged, however, the case is remitted to the Departmental Selection Committee (DSC) for reconsideration strictly in accordance with law and rules on the subject. 5. In view of above, the instant writ petition is disposed of. It is expected that the District 6. Education Officer (Female), District Charsadda shall constitute the DSC within a fortnight, where the case of parties shall be considered within a month time positively. Announced on; 24th of September, 2019 UDGE (DB) Hon'ble Mr. Justice Rooh Ul Amin Khan & Hon'ble Mr. Justice Ishtiaq Ibrahim "Larshad" **KTIFIED TO** TRUÉ 26 SEP 2019

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA Emischarsadda.deo@yahoo.com Phone No. # 091-9220486 -Email Address: emischarsadda.deol@y

MINUTES OF THE SCRUTINY COMMITTEE CONSTITUTED ON THE DIRECTION OF HONARABLE COURT IN THE CASE OF SAIMA SHAH IN WRIT PETITION NO. 2287/P-2017.

As per instructions of the Hobrable High Court Khyber Pakhtunkhwa Peshawar, in writ petition No. 2287/P-2017, a meeting of the District Selection Committee was held on 31-12-2019, at 10.00 AM under the chairpersonship of District Education Officer (Female) Charsadda in her office for the Review/ Re- Exam of PST Post of Union Council Dhakki, The Committee was comprising of the following members attended the meeting:

I. District Education Officer (F) Charsadda	in-Chair		
 Representative of Directorate(E&SE) 	Member		
. Miss Laila Ali Dy DEO (Female) Charsadda.	Member		
. Miss Sabreena Fayaz (ADEO Sec: Estbb)	Member		
. Mr Khadim Shah (Suptt: Secondary Estb)	Member		
Mr Nihar Muhammad Assistant Estbb Branch Member			
. Mr Sajid Ali S/Clerk Estabb Branch Local Office Member.			
. Muhammad Saeed Daftarri/ Computer Typest	Facilitator.		

8 ea Dattarri/ Computer Typest

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The meeting started with the recitation of some verses from the Holy Quran.

The DEO (Female) Charsadda briefed the committee members about the nature and proceedings of the case . Then the Committee Scrutinized all the relevant record and found that:.

- 1. At the time of submission of application From Tahira Bibi Submitted FA Certificate and found eligible for the post.
- 2. After the Process the merit list was prepared and her name cannot be seen anywhere in the 1st merit list.
- 3. The DEO (Female) has not demanded any certificate from her during the interview and checking the documents. The Committee did not find any letter in the whole record.
- 4. Tahira Bibi has submitted an Arabic Honour certificate and due to heavy rush of work inadvertently her FA Marks have been exchanged with the Arabic honour by the DSC.

5. According to the NTS Result the Score of Mst: Tahira is 96.77 later on increased by the DSC committee inadvertently to 100.04 through Arabic Honor Certificate, and the petitioner of Mst: Saima Shah heaving score 98.84 Date of Birth is 12-02-1995., and Mst: Musarat Begum heaving Score is 98.84 & Date of Birth is 08-03-1987, boths Score heaving 98.84 . hence on the basis of date of birth Mst: Musarat begum is next deserving candidate.

So it is recommended that her score be calculated on her FA Certificate which she has submitted for the first time to NTS and the next Eligible candidate be given an offer of appointment. 🗸

The chairperson ended the meeting with the appreciation of words for all participants.

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(MISS ULFAT BEGUM) District Advation Officer (Female) Charsodda (Chairperson)

T

(Miss Laial Ali) Dy DEO (Female) Local Office (Facilitator).

(Miss Sabreena Fayaz) ADEO (Female) Estbb: Secy Chd.

Max Mhammad 1 (Mr Nihar Muhammad)

Assistant Estbb: Secy Branch Chd. (Member) ÷

(MitMuhambod Saeed) Dollarri / Composer Noest Local Ollice (Faciliard).

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(Mr Jehangir Knar Kakar DEO (M) Chd. Representative of Directorate (Memoer)

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V

(Mr Khadim Shah) Ex- Supdtt: Secy/ Pry Local Office. (Member)

(Mr sajid Ali s/Clerk) (Member) Local Office.

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<u>T EDUCATION OFFICER (FEMALE) CHARSADDA</u> OFFICE OF

APPOINTMENT ORDER

Consequent upon the Judgment of the Hon, ble high court Peshwar COC NO, 72-p/2020 in writ petition No 2287-p/2017 issued direction on the recommendation of the District Selection Committee lated 31-12-2019 the appointment of Mst Tahira bibi D/O Sher Muhammad PST GGCMS Dhakki at S-No 132 No ification No 3663-15 dated 19/05/2017 is hereby withdraw and Mst, MST MUSARRAT BEGUM D/O SABZALI is hereby appointed against the vacant post of Primary school teacher (PST) SCHOOL BASED J/C BASET in BPS-12 ,Rs.13320-960-42120, (fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the provincial Government in teaching cadre against the vacant post at GGCMS Dhakki w-ef the date of taking over charge at the said school in the interest of public service.

Terms and Conditions;-

NO TA/DA etc is allowed. İ.

- Charge reports should be submitted to all concerned in duplicate. ż.
 - Appointment is purely on temporary & contract basis initially for one year under the rules and policy.
- She should not be handed over charge if she exceeds 35 years or below 18 years of age. 3-
- Appointment is subject to the condition that the certificate/documents must be verified from the concerned 4. authorities by the DEO (concerned) Any one found producing bogus Certificate will be reported to the law 5.
- Her services are liable to termination on one month's notice from either side. In case of resignation without б.
- notice her one-month pay/allowances shall be forfeited to the Government. Pay will not be drawn until and unless a certificate to the effect by DEO(concerned) is issued that her
- She should join her post within 15 days of the issuance of this notification. In case of failure to join Her post 7. within 15 days of the issuance of this notification, her appointment will expire automatically and no subsequent 8.
- appeal etc shall be entertained..
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking
- 10. She will be governed by such rules and regulations as may be issued from time to time by the Govt. 11. Her services shall be terminated at any time, in case her performance is found unsatisfactory during her contract period. In case of misconduct, she shall be preceded under the rules framed from time to time.
- 12. Her appointment is made on School based, they will have to serve at the place of posting, and their service
- is not transferable to any other station. Before handing over charge once again their document may be checked if they have not the required. qualifications they may not be handed over charge.

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[Apptt:of, verification AD, Endst: No Copy forwarded to the;-PS to Secretary E&SE Khyber Pakhtunkluwa Peshawar.

Additional Registrar Peshawar High Court Peshawar. PA to Director, E&SE Khyber Pakhtunkhwa Peshatoar. District Accounts Officer Charsadda. SDEO (Female) Tangi.

- 5. Head Teacher concerned.
- 6. Official concerned 7.
 - Office file.

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020 Dated

(MISS Ulfat Beguni) DISTRICT EDUCATION OFFICER (FEMALE), CHARSADDA

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EDUCATION OFFICER DISTRICT (FEMALE) CHARGADD

خدمت جناب ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری ایجوک پشاور

سائلہ حسب ذیل عرض رسال ہے۔

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یہ کہ سائلہ کی تقرری میرٹ پر ہوئی با قاعدہ درخواست آ ریبک آ رزز کیلئے دی اور متعلقہ DEO نے میرے (Hons کے نمبر دینے اور میری تقرری میرے (Hons کے نمبر دینے اور میری تقرری مور خبر 10/05/2017 کو ہوئی۔

ید کہ میرے نمبرات پر با قاعدہ انکوائر کی جناب حافظ ابراہیم صاحب (EDO در) نے کی جس میں DEO فی میل چارسدہ نے مانا تھا کہ میرے نمبرات (Hons) میلئے ہیں ۔ اس دوران تقریبا 3 سال سروس کی اورریگولر بھی ہوئی مگراب 3 سال بعد DEO فی میل نے غلط بیانی کرتے ہوئے میرے نمبر 100 سے کم کرد بیئے اور قواعد وضوابط کے خلاف 3 ال بحد کسی دوسری میچر کی تعییناتی کا آرڈر کردیا۔

بیر که دوران کمیٹی میٹنگ نہ مجھے سنا گیا ہے اور نہ ہی میر ے سامنے کوئی ریکا رڈیا بیان لیا گیا ہے۔

4- یہ کہ سائلہ 3 سال بعد ملازمت سے ہٹا نا اور اس کی وجہ نئی ٹیچر کی تعیناتی قانون' قواعد دضوالط کی خلاف ورزی ہے جس کی دجہ سے درخواست ہٰذا کی ضرورت لاحق ہوئی۔ لہٰذا استدعا ہے کہ بمنظوری درخواست ہٰذا سائلہ کی 3 سالہ ملازمت' کارکردگی میر بے کو مدنظرر کھتے ہوئے سائلہ کو ملازمت پر دوبارہ بحال کیا جائے۔

China Bibi سائلہ:طاہرہ بی بی دختر شیر محمد ساكن يونين كوسل دهكى بخصيل تنكى ضلع حيارسده شاختى كارد نمبر2-17106-9023646

موبائل نمبر 0302-5591657

0345-9899198

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BEFORE THE PESHAWAR HIGH COURT, PESHA

Writ Petition No.____/2020

Tahira Bibi D/O Sher Muhammad, R/o Dhakki, Tehsil Tangi, District Charsadda.

PETITIONER

VERSUS

- 1. The Government of Khyber Pakhtunkhwa through Secretary Education (E&SE), Civil Secretariat Peshawar.
- 2. The Director Education (E&SE), Near Firdous Chowk, Peshawar City.
- 3. The District Education Officer (E&SE) (Female) District Charsadda.

4. Musarrat Begum D/o Sabz Ali, PST GGCMS Dhakki, Charsadda.

RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISMLAIC REPUBLIC OF PAKISTAN, 1973 AS AMENDED UPTO DATE.

RESPECTFULLY SHEWETH:

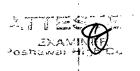
Brief facts giving rise to present petition are as under:-

- That the petitioner is a law abiding citizen of Pakistan and belongs to District Charsadda. The petitioner has passed SSC, F.A, Arabic (Hons). <u>Copies of the certificate are</u> <u>attached as Annexure-A.</u>
- 2. That the respondent No. 3 advertised some posts including PST, in daily newspaper of September, 2016, in the said advertisement the requisite qualification for PST Posts were mentioned as Intermediate or Equivalent qualification from a recognized Board with PST/Diploma. <u>Copy of advertisement is attached as Annexure-B.</u>

ATTESTER Examine Poshawar High Cour

That the petitioner also applied for the post of PST and 3. participated in test & interview. When, first tentative merit list was displayed, the petitioner by there and then, agitated about non-inclusion of marks of Arabic (Hons). The same position was prevailed even on seond time merit list, the petitioner forthwith filed an appeal again on 13.05.2017 (duly diarized), thereafter, the marks of the petitioner were corrected as 100.4 on acceptance of her appeal. Thus the petitioner was finally appointed as P.S.T on 19.05.2017. Copies of appeal and appointment order are attached as Annexure-C & D.

- 4. That against the appointment of the petitioner one namely candidate Saima Shah filed an application. On that application an enquiry was conducted by Dr. Hafiz Muhammad Ibrahim. The said inquiry was resulted in favour of the petitioner. But the complainant (Saima Shah) again approached Secretary (E&SE) for the redressal of her grievances. The second inquiry was concluded in favour of Mst. Saima Shah. Copies of inquiry reports are attached as Annexure-E & F.
- 5. That then a writ petition No. 2227/2017 was filed by the complainant (Saima Shah). The said writ petition was heard on 29.09.2019, and the august Court was kind enough to dispose of the writ petition in terms "the case is remitted to Departmental Selection Committee for reconsideration strictly in accordance with law". Copies of the W.P and order are attached as Annexure-G & H.
- 6. That after the direction of the Honorable Court, the DSC meeting was convened on 1.12.2019 and the petitioner was knock out on the ground that the petitioner was inadvertently given marks of Arabic Honor by DSC and DEO Female did not demand any certificate from the petitioner at the time of interview. These findings are totally in contradiction within Annexure-C duly dairized in the office of DEO Female. However, vide order dated 20.04.2020 the petitioner's appointment order has been withdrawn and the private respondent No. 4 (Musarrat Begum) has been appointed in place of petitioner. Copies of



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minutes of DSC and order are attached as Annexure-I & J.

- 7. That the petitioner also filed appeal against the order dated 20.04.2020 but the same has not been responded so far. Copy of appeal is attached as Annexure-K.
- 8. That having no other remedy the petitioner is constrained to file the instant writ petition on the following grounds amongst the others.

GROUNDS:

- A) That the impugned withdrawal order dated 20.04.2020 is against the law fact, norms of justice and material on record therefore not tenable.
- B) That the petitioner was appointed on 19.05.2017 and was subsequently regularized by virtue of an Act of the Provincial Assembly in 2018. Thus due to change of status the appointment order of the petitioner, the order could not be so simply withdrawn without hearing the petitioner. Thus the whole act/omission of Respondent DEO is against the norms of justice, fair play.
- C) That the petitioner was validly appointed as PST on 19.05.2017 on adhoc/contract basis and subsequently regularized in the year 2018 by virtue of an Act of Provincial Assembly, which created valuable rights in favour of the petitioner and as such under the principles of locus poententaie the appointment order of the petitioner could not be withdrawn.
- D) That the petitioner was not associated while giving findings against her and as such the petitioner has been condemned unheard which is also the violation Article 10-A of the Constitution.
- E) That due to one sided act of the Respondents, the fundamental rights of the petitioner, guaranteed under Article 2A, 4, 9, 25 & 38 are affected. Thus the whole action of the Respondent DEO which is against the spirit of principle of justice and is liable to be struck down.

That the findings of the DSC is self-presumed one, because in the inquiry conducted by Dr. Hafiz Ibrahim, the DEO (Female) Charsadda had categorically admitted that the

EXAMPLE

petitioner submitted appeal for consideration of Arabic (Hons) before the preparation of final merit list and after acceptance of her appeal, the merit position of the petitioner was corrected and was became within the selection ambit.

- G) That no fair chance whatsoever was provided to the petitioner while withdrawing her regular appointment order in an arbitrary manner.
- H) That the petitioners seek permission to advance other grounds and proofs at the time hearing.

It is, therefore, most humbly prayed that on acceptance of this writ petition the Honorable Court may be pleased to:-

- (1) <u>Declare</u> the order dated 20.04.2020 and not responding the petitioner's appeal, may be declared as illegal unlawful, unconstitutional, without lawful authority, and against the spirit of Article 2A, 4, 9, 25 & 38 of the Constitution. Therefore the impugned order is liable to be struck down being ineffective upon the rights of the petitioner.
- (2) <u>Direct</u> the respondents to restore the petitioner of the appointment order 19.05.2017 with all back and consequential benefits.
- (3) Any other remedy which this august court deems appropriate may also be awarded in favour of petitioners.

INTERIM RELIEF:-

The operation of the impugned order dated 20.04.2020 may be suspended till the disposal of main writ petition.

ire, PETITIONER

Tahira Bibi

THROUGH:

(M. ASIF YOUSAFZAI) ADVOCATE SUPREME COURT, OF PAKISTAN.

: Seite



VERIFICATION:

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It is verified that no other Writ Petition earlier has been filed between the present parties, except the present one.

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DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.

2. Any other case law as per need.

NOTE: Prior Notice along with the copies of the Writ Petition has already been given to the respondents as per amended High Court's Rules dated. 23.02.2016

(M. ASIF YOUSAFZAI) ADVOCATE SUPREME COURT, OF PAKISTAN.

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30 MAR 2022

BEFORE PESHAWAR HIGH COURT PESHAWAR

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Writ Petition No 2598-p/2020

Tahira Bibi.....Petitioner

Vs

Govt: of Khyber PuktunKhwa..... Respondent

Written comments on behalf of Respondents 02 and 03

Respectfully Sheweth:

Preliminary Objections:

- A. The Petitioner has no locus standi and cause of action.
- B. That the present petition is wrong, baseless and not maintainable, it shown no strong cause to be taken for adjudication, therefore the same petition is liable to be rejected/ dismissed.
- C. That the petition is hit by laches.
- D. Petitioner has not come to this Hon, able court with clean hands. The writ petition also suffers from mis-statements and concealments of facts and as such the petitioner is not entitled to equitable relief.
- E. That the petitioner has no right to file the instant writ petition and the Hon, able court have got no jurisdiction to adjudicate upon and the writ petition is liable to be dismissed.

PARA WISE REPLY ON FACTS:

The respondents humbly submit as under:

- 1. No comments. Subject to records.
- 2. Correct to the extent that this office have advertised some posts.
- 3. Incorrect, As the petitioner Admitted herself that she had filed an appeal on 13-05-2017 For the correction of her marks/too includes Marks of Arabic(Hons) while last for submission of documents to the advertisement is 30 September 2016 ,photo copy attached as Annexure 'A'. The prescribed qualification for the Post of PST was F.A,F.SC under the service rules hence in presence of prescribed qualification the District selection Committee was not supposed to accept the equivalent certificate of honor of Arabic qualification and to consider at belated stage i.e after the due date and even after the preparation of merit list.
- 4. Correct to the extent that an enquiry by Dr. Hafiz Muhammad Ibrahim was conducted but later on that enquiry was regretted by one Mst; Saima Shah and filled a W/P No.2227-P/2017
- 5. As stated in the above Para 01 Mst; Saima Shah has regretted the enquiry concucted by Dr. Hafiz Muhammad Ibrahim and filled a W/P No.2227-P/2017 which was disposed of on 24/09/2019 with the directions that "The District Education Officer (Female) District Charsadda shall constitute the DSC with in forth night where the case of the parties shall be

FILED TODAY

considered within a month time positively". Photo copy of order dated 24/09/2019 is attached as Annexure 'B'. adr. Meeting was held on 31/12/2019 at As a result of Hon'able High Court DSC was 10:00 AM the committee scrutinized the relevant records and recommended that the score of the Petitioner be calculated on her F.A certificate which she has submitted for the first time to NTS and the next eligible candidate (Mst; Musarat) be given an offer of appointment! Photo copy of the minutes of scrutiny committee is attached as Annexure 'C'. and as a result of that minutes one Mst; Musarat Begum was duly appointed. Photo Copy of her appointment order is attached as Annexure 'D'.

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No Comments.

GROUNDS

A. Incorrect that this Office has done according to Law/Policy.

B. Incorrect as stated under Para '06' on fact above.

- C. As stated under Para '5' above.
- D. Incorrect that all the procedure were taken according to the direction of Hon'able High
 - Court.
- E. Incorrect hence denied.
- F. Incorrect as stated under Para '4' above.
- G. Incorrect hence denied.
- H. That this department also seekes permission of the Hon'able Court to add further grounds at the time of hearing.

PRAY:

It is therefore most Humbly prayed that keeping in view the above circumstances the petition may graciously be dismissed with cost.

Respondents:

2) Director E&SE Khyber Pakhtunkhwa Peshawar 3) The District Education Officer (Female) Charsadda

Deputy Registrar

0 2 FEB 2021

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 2598-P/2020

Tahira bibi

VERSUS

Govt. of Khyber Pakhtunkhwa & others

AFFIDAVIT

I, Mst: Shagufta Rani ADEO (lit) DEO (f) Office, charsadda do here by solemnly affirm and declare that the Contents of the Para wise comments true and correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'able Court.

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..... Petitioner

..... Respondents

DEPONENT

CNIC No. 17101-6293694-8 Mobil No. 0300-9343120

Identified by

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ADVOCATE GENERAL, KHYBER PAKHTUNKHWA, PESHAWAR かんりょう

FILE Deplety Registrar 0 2 FEB 2021

No. 18819 Certified that the above was verified on solemnly affirmation before me in office. his, 02 who was identified Who is personally maken

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JUDGMENT SHEET IN THE PESHAWAR HIGH COURT, PESHAWAR [JUDICIAL DEPARTMENT]

Writ Petition No.2598-P/2020

Tahira Bibi

versus The Govt. of Khyber Pakhtunkhwa through Secretary Education (E&SE), Peshawar & 3 others

Date of hearing: <u>17.03.2022.</u>

Mr. Muhammad Asif Yousafzai, Advocate, for the petitioner.

Mr. Muhammad Riaz Khan, AAG for the official

respondents. Mr. Mubarak Zeb, Advocate for the respondent No.4.

IUDGMENT

SHAKEEL AHMAD. I.- By means of this constitutional petition, filed under Article 199 of the Constitution of the Islamic Republic of Pakistan, 1973, the petitioner has sought the

following relief: -

"It is, therefore, most humbly prayed that on acceptance of this writ petition the Honourable Court may be pleased to:

(1) Declare the order dated 20.04.2020 and not responding the petitioner's appeal, may be declared as illegal lawful, unconstitutional, without lawful authority, and against the spirit of Article 2A, 4, 9, 25 & 38 of the Constitution. Therefore, the impugned order is liable to be struck down being ineffective upon the rights of the petitioner.

(2) Direct the respondent to restore the petitioner of the appointment order 19.05.2017 with all back and consequential benefits.

(3) Any other remedy which this august court deems appropriate may also be



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awarded in favour of petitioners.

02. After arguing the case at some length, learned counsel representing the petitioner stated at the bar that he would not press this petition any more, if direction is given to the respondent No.2 (*Director Education, Elementary & Secondary Education, Peshawar*), to decide the petitioner's appeal pending before him, within a shortest possible time.

03. In view of the above, we direct respondent No.2 (*Director Education, Elementary & Secondary Education, Peshawar*), 'to decide the petitioner's appeal pending before him, within a shortest possible time but not later than one month, after receipt of this order.

04. With the above terms, this petition is disposed of.

Announced 17.03.2022.

JUDGE

IUDGE Hon'bie Mr. Justice Abdul Shakoor Hon'bie Mr. Justice Shakeel Ahmad DB Himavat, CS 3 0 MAR 2022 28873 17:3:22 pate of Procental in 11 Naké Majab (Propinsi chipyEepidensins. 28---n yn with weine de Malferdauge 10minana and 30.3.22 Date of Perma 30 -3:22

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BI	<u>VAKAL</u> FORE THE KPK SER	LATNAMA RVICE TRIBUNAL, PESHAWAR.
<u>SA</u>	No/202	22
Takira Bita	、 <u>か</u>	Appellant
· • :	VERSUS	
Divedor	& others	Respondent(s)
1 Jahi	ra Bibi	, do hereby appoint and constitute,

Fazal Shah Mohmand Advocate Supreme Court &. To act, appear and plead in the above-mentioned matter and to withdraw or compromise the said matter or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said matter and to receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said matter.

- 1. To draft and sign files at necessary pleadings, applications, objections, affidavits or other documents as shall be deemed necessary and advisable for the prosecution of the said matter at all its stages.
- 2. **To** employ any other Legal Practitioner, authorizing him to exercise the power as conferred on the undersigned Advocate, wherever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. I further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received by me on $\frac{\partial |l| \nabla v}{\partial l}$

CLIENT(S) - Calina Risa BBC-111-

ACCEPTED BY:

Fazal Shah Mohmand Advocate, Supreme Court Of Pakistan.

<u>OFFICE:-Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841</u> (Clerk) Cell# 03339214136 Email: - fazalshahmohmand@gmail.com.