

20.09.2022

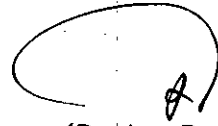
Junior to counsel for appellant present.

Muhammad Jan, learned District Attorney alongwith Rehana Yasmin DEO and Wasim Akhter ADEO for respondents present.

Former requested for adjournment as senior counsel for appellant is busy before the Hon'ble Peshawar High Court, Abbottabad Bench. Adjourned. To come up for arguments on 15.11.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad



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

14.02.2022


Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 18.05.2022


  
Reader

18.05 2022

Counsel for the appellant present. Mr. Asif Masood, Deputy District Attorney for the respondents present.

Previous date was changed through Reader's note, therefore, notice for prosecution of appeal be issued to the appellant and his counsel. To come up arguments before this D.B on 19.07.2022 at camp court Abbottabad.


  
(Fareeha Paul)  
Member (E)


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

19<sup>th</sup> July 2022

Counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG alongwith Miss. Mehr Sani, Dy: DEO (F) for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 20.09.2022 before D.B at camp court Abbottabad.

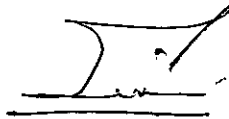
  
(Salah Ud Din)  
Member (Judicial)

  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

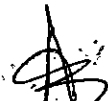
11.10.2021

Mr. Shah Faisal, brother of the appellant, on behalf of the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Muhammad Usman, Incharge Litigation for official respondents No. 1 to 3 present. Private respondent No. 5 in person present. None present on behalf of private respondents No. 4, 6 to 10 despite issuance notice through registered post, hence they are proceeded ex-parte<sup>e</sup>.

Representative of official respondents as well as private respondent No. 5 sought further time for submission of written reply/comments. Respondents are directed to furnish reply/comments within 10 days in office. In case the respondents fail to submit reply/comments within stipulated time from today, they shall have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of reply/comments shall be deemed as struck off. To come up for arguments before the D.B on 14.02.2022 at Camp Court Abbottabad.



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD



CHAIRMAN  
CAMP COURT ABBOTTABAD

24.06.2021

Counsel for the appellant present and has submitted an application for early hearing of Appeal No. 3978/2020 citing the reason that the instant appeal is still pending for preliminary hearing even notice has not been issued to the opposite parties. The appellant is under pressure due to which she is facing mental agony. Application is accorded. File has been requisitioned in view of the said application, which is placed on file. Preliminary arguments heard.

Through this appeal, the appellant seeks relief for correction of allotment of wrong seniority, due to which she has been deprived from promotion to PHST post. Subject to all just and legal objections, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 11.10.2021 before the D.B at Camp Court, Abbottabad.

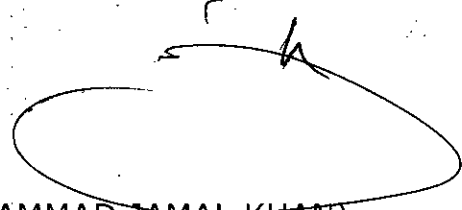
Appellant Deposited  
Security & Process Fee

24/6/21

  
Chairman

20.11.2020

Mr. Faisal Sajjad, Advocate for appellant is present. Learned counsel submitted application for impleadment of 6 junior teachers who were promoted out of turn for arraying them in the panel of respondents, which is placed on record and at the same time is seeking time that his senior has proceeded to Federal Service Tribunal, Islamabad hence, requested for adjournment. Adjourned to 19.02.2021 on which date file to come for further proceedings before S.B at Camp Court, Abbottabad.

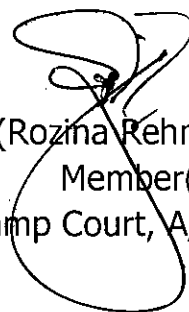


(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

19.02.2021

Nemo for appellant.

Notice be issued to appellant/counsel for 15.06.2021 for preliminary hearing before S.B at Camp Court, Abbottabad.



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

Form- A

FORM OF ORDER SHEET

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

Case No.- 3978 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/05/2020	<p>The appeal of Mst. Robina Haider <sup>re-submitted</sup> received today by Mr. Fida Bahadar Khan, Advocate, may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p><i>[Signature]</i> REGISTRAR 4/5/2020</p>
2-		<p>This case is entrusted to touring S. Bench at Camp Court, Abbottabad for preliminary hearing to be put up on <u>16-11-20</u>.</p> <p>MEMBER</p>
16.09.2020		<p>Mr. Fida Bahadar, Advocate for appellant is present. Learned counsel is seeking time for preparing the brief. Time is allowed. The appeal is adjourned to 20.11.2020. File to come up for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p><i>[Signature]</i> (MUHAMMAD JAMAL KHAN) MEMBER CAMP COURT ABBOTTABAD</p>

The appeal of Mst. Robina Haider received today by post i.e. on 17.04.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memo. of appeal may be got signed from the appellant.
- 2- Annexures B, C, E and page 20 are illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be flagged properly.
- 4- One more copy of appeal alongwith annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1017/S.T,

Dt. 20-04/2020

  
20/4/2020  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Fida Bahadar Advocate, Abbottabad.

*Respected Sir,*

*All above mentioned objections have been removed as per your directions. Again submitted for further action please.*



**FIDA BAHADAR**  
Advocate  
Supreme Court of Pakistan

BEFORE THE WORTHY SERVICE TRIBUNAL KPK,  
PESHAWAR

SERVICE APPEAL NO. 397<sup>8</sup>/2020

MST ROBIONA HAIDER VS GOVT OF KPK AND OTHERS

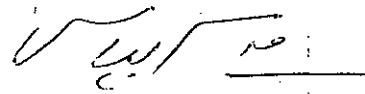
SERVICE APPEAL  
INDEX

S #	Description	Annexure	Page #
01	Service Appeal, affidavit and application for condonation of delay.	-	1-12
02	Copy of original seniority list	A	13
03	Copy of impugned seniority list	B	14-14A
04	Copy of impugned promotion order	C	15-16
05	Copy of departmental appeal	D	17
06	Copy of Promotion order of appellants	E	18
07	Copy of departmental appeal and withdrawal order from CT list.	F- G	19-20
06	WAKALATNAMA		21

Dated 06/04/2020

....APPELLANT

Through:



(FIDA BAHADAR)  
Advocate Supreme Court,  
Abbottabad.



**BEFORE THE WORTHY SERVICE TRIBUNAL  
KPK, PESHAWAR**

3978  
SERVICE APPEAL.NO. /2020

**MST ROBINA HAIDER PSHT GOVT GIRLS PRIMARY SCHOOL  
KOTLI, LOHAAR BANDA, TEHSIL & DISTRICT MANSEHRA**

**APPELLANT**

**VERSUS**

1. GOVT OF KPK, THROUGH SECRETARY EDUCATION (ELEMENTARY AND SECONDARY) PESHAWAR.
2. DISTRICT EDUCATION OFFICER (FEMALE), MANSEHRA.
3. SUB DIVISIONAL EDUCATION OFFICER (FEMALE), MANSEHRA.
4. NIGHAT ZAIB, PSHT GOVT GIRLS PRIMARY SCHOOL TAANDA, MANSEHRA.
5. NAZIA BASHIR SPST, MERA AHMAD ALI, MANSEHRA.
6. NABEELA KOSAR, SPST THATHI KALAN, MANSEHRA.
7. SAIMA BI BI SPST, KALWAL, MANSEHRA.
8. NARGAS BI BI SPST JANGLAN, MANSEHRA.
9. GULSHAD, SPST, CHAKLI SARIAN, MANSEHRA.
10. NAZIA BI BI SPST, MOHRAN DOGA, MANSEHRA.

**RESPONDENTS**

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**APPEAL UNDER 4 SERVICE TRIBUNAL ACT 1973  
AGAINST THE SENIORITY LIST OF CT BPS-14  
ISSUED/PREPARED BY RESPONDENT NO.3 VIDE  
WHICH THE NAME OF APPELLANT WAS  
WRONGLY INCLUDED AND PLACED ON SERIAL**

NO.15 ON THE BASIS OF SUCH SENIORITY LIST 56 TEACHERS WERE PROMOTED IN BPS 15 VIDE ORDER DATED 24/07/2019 BY DROPPING THE APPELLANT AS SHE IS NOT CT TEACHER AND DISTURBED THE SENIORITY OF APPELLANT, WHICH IS ILLEGAL, AGAINST LAW, VOID AB-INITO AND APPELLANT BEING SENIOR TO THE RESPONDENTS NO.4 TO 10. AND ALSO IS ENTITLED FOR THE SENIORITY ON SERIAL NO.22 OF ORIGINAL SENIORITY LIST OF SPST AND SHE IS ALSO ENTITLED FOR PROMOTION IN BPS 15 AS PSHT WITH EFFECT FROM 11/07/2019 INSTEAD OF 18/09/2019 WITH POSTING ORDER IN GGPS TANDA IN HER OWN UNION COUNCIL AS PER RULES.

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**PRAYER:**

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THIS HONOURABLE TRIBUNAL MAY SET ASIDE THE IMPUGNED SENIORITY LIST ISSUED BY RESPONDENT NO.3 AND RESPONDENTS BE DIRECTED TO PLACE APPELLANT AS SENIOR FROM THE RESPONDENT

NO.4 TO 10 AT SERIAL NO. 22 OF SPST SENIORITY LIST AND PROMOTED IN BPS 15 PSHT WITH EFFECT FROM 11/07/2019 INSTEAD OF 18/09/2019 BY MODIFYING/RECTIFYING THE PROMPTION ORDER OF APPELLANT DATED 20/09/2019, ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL MAY DEEM FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

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*Respectfully Sheweth:*

Following are the facts, giving rise to the instant services appeal.

1. That Appellant was appointed as Primary School Teacher (PST) on 07. 12. 2004 in BPS 9 and thereafter appellant was promoted in BPS 12 and 14 respectively, and serving in GOVT Primary School Tanda, Mansehra.
2. That appellant throughout her professional carrier performed her duty with zeal and zest, and never give

any opportunity to her superiors to question her conduct or job.

3. That, appellant is serving in the education department since 15 years approximately.
4. That the appellant is senior most, Teacher in her circle and Union Council, and her name was placed at serial number 22 of original seniority list. **Copy of seniority list is attached as annexure "A"**
5. That with malafide intention and under political pressure the name of appellant was wrongly entered / included and mentioned in list of CT teacher at serial No. 15 vide notification No. 10529-87 dated 11.07.2019, although appellant is not CT teacher. **Copy of seniority list/notification is attached as Annexure "B"**
6. That on the basis of said impugned CT seniority list, respondents department promoted 56 teachers excluding appellant and respondent No.4 to 10 also promoted who were junior to appellant and in this way the original seniority list was disturbed and appellant was deprived from due promotion being senior most teacher of union council is, illegal, unlawful, void ab-initio, against the law, based on malafide, biased and against the service rules. **(Copy of the promotion order / notification**

**Endst: No. 11703-68 dated 24/07/2019 is attached as  
Annexure "C")**

7. That departmental appeal was filed by appellant against said impugned seniority list and promotion order/Notification dated 24/07/2019 before competent authority but the same was not decided by the authority with in due time and verbally it was told to appellant that her name was included erroneously in CT list which would be rectified and appellant would be promoted in BPS 15 on her own turn with effect from 24/07/2019. copy of appeal is attached as annexure "D".

**8. That meanwhile a post of PSHT has been vacated in GGPS Tanda and appellant again made request to respondents for promotion and adjustment of appellant against the said post but with malafide intention the respondent No. 4 was transferred and adjusted against said post, which was against the law and rules and based on political pressure.**

9. That against the said orders the majority of vicinity moved application before respondent No. 1 and appellant was promoted as PSHT in BPS 15 and adjusted in GGPS UC ~~ichsan~~ Lohaar ~~Banda~~ vide promotion order dated.20/09/2019. Copy of said order is attached as annexure "E"

10. That another departmental appeal was filed by appellant before competent authority on 27/09/2019. Copy of appeal is annexed as annexure "F".

11. That respondents did not decide the appeal of appellant and did not correct and rectify the impugned seniority list and did not promoted the appellant with effect from 24.07.2019. *and only withdrawn the name of appellant from CT List. order is attached as Annexure. G*

12. That, petitioner left with no other option but to assails the act of respondent No.2 before this Honourable tribunal, inter-alia, on the following grounds:-

**GROUND:**

- a) That the act of respondents No.1 to 3 is against the fundamental right of the appellant, which is guaranteed under constitution of Islamic republic of Pakistan 1973.

- b) That the act of respondents is illegal, unlawful, against law, against facts and circumstances of the case and against the principle of natural justice.
- c) That the respondents did all the proceedings without touching the legal requirements of the law and procedure hence the impugned order is liable to be set aside.
- d) That all the wrongful, unlawful steps were taken by the respondents No. 2 & 3 to facilitate the respondent No.4 and she is adjusted against the rules and after her promotion she was again adjusted in Union Council Tanda even before completion of her tenure.
- e) That the adjustment of respondent No. 4 in UC Tanda and promotions of respondents No. 5 to 10 before promotion of appellant by dropping the appellant in promotion order dated 24/07/2019, is against the law and natural justice, hence the act of respondents No.1 to 3 is unlawful and illegal and liable to be struck down.
- f) That appellant filed an appeal to respondents against their such illegal act, on which respondents kept deaf ear and

without giving opportunity to appellant, promoted the respondent No.5 to 10, who were junior to appellant as per law, and wrongly adjusted the respondent No. 4 in UC Tanda, in this way the said act of respondents is unlawful as well as grave misuse of power and law.

g) That the other points would be urged at the time of arguments.

h) The appeal is well within time even then application for condonation of delay is also moved by the appellant.

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THIS HONOURABLE TRIBUNAL MAY SET ASIDE THE IMPUGNED SENIORITY LIST ISSUED BY RESPONDENT NO.3 AND RESPONDENTS BE DIRECTED TO PLACE APPELLANT AS SENIOR FROM THE RESPONDENT NO.4 TO 10 AT SERIAL NO. 22 OF SPST SENIORITY LIST AND PROMOTED IN BPS 15 PSHT WITH EFFECT FROM 11/07/2019 INSTEAD OF 18/09/2019 BY MODIFYING/RECTIFYING THE PROMPTION ORDER OF APPELLANT DATED 20/09/2019, ANY OTHER RELIEF**



WHICH THIS HONOURABLE TRIBUNAL MAY DEEM FIT  
AND PROPER IN THE CIRCUMSTANCES OF THE CASE  
MAY ALSO BE GRANTED TO THE APPELLANT.

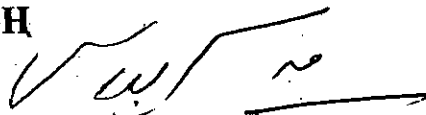
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Dated: 06/04 /2020

...APPELLANT

Robina

THROUGH



FIDA BAHADAR  
ADVOCATE SUPREME COURT  
ABBOTTABAD

**VERIFICATION:-**

*Verified on oath that the contents of foregoing  
Service Appeal are true and correct to the best of my knowledge  
and belief and nothing has been concealed from this Honourable  
Court.*

Dated: 06/04 /2020

...APPELLANT

Robina

**BEFORE THE WORTHY SERVICE TRIBUNAL  
KPK, PESHAWAR**

SERVICE APPEAL.NO. /2020

MST.ROBINA HAIDER VS GOVT OF KPK AND  
OTHERS

SERVICE APPEAL

AFFIDAVIT

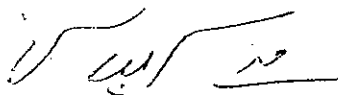
I, MST ROBINA HAIDER PSHT GOVT GIRLS PRIMARY SCHOOL, KOTLI, LOHAAR BANDA, TEHSIL & DISTRICT MANSEHRA, *appellant* do hereby solemnly affirm, and declare that the contents of forgoing *Service Appeal* are true and correct to the best of my knowledge and nothing has been suppressed from this Honourable Court.

Dated:- 06/4 /2020

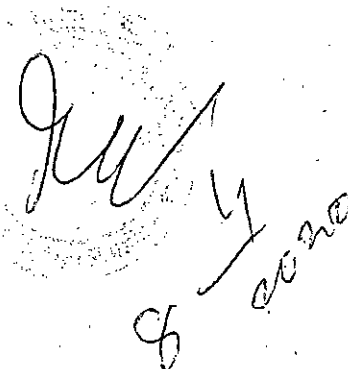
...DEPONENT

IDENTIFIED BY.

Robina



FIDA BAHADAR  
ADVOCATE SUPREME COURT  
ABBOTTABAD

  
8/4/2020

**BEFORE THE WORTHY SERVICE TRIBUNAL  
KPK, PESHAWAR**

**SERVICE APPEAL.NO. /2020**

**MST ROBIONA HAIDER VS GOVT OF KPK AND  
OTHERS**

**SERVICE APPEAL**

**CERTIFICATE**

*Certified that no such Service Appeal under the same case  
title has earlier been filed before this Hon'ble Tribunal.*

Dated: *06/04/2020*

**APPELLANT**

**THROUGH**



**FIDA BAHADAR  
ADVOCATE SUPREME COURT  
ABBOTTABAD**

**BEFORE THE WORTHY SERVICE TRIBUNAL  
KPK, PESHAWAR**

SERVICE APPEAL.NO. /2020

MST ROBIONA HAIDER VS GOVT OF KPK AND  
OTHERS

**SERVICE APPEAL**

**APPLICATION FOR CONDONATION OF DELAY**

Respectfully sheweth


1. That the titled appeal is being filed before this Honorable tribunal and instant application may be treated as integral part of Appeal.
2. That the instant appeal is being filed with some delay because the respondents verbally assured the appellant that she should be accommodated compensated by correction of seniority list and she would be promoted with effect from, 24.07.2019 and appellant was just waiting for positive response of respondents but they refused in last week of March 2020 and thereafter due to Corona Virus and Lock down the appellant could not file the appeal with in time.
3. That the valuable rights of appellant are involved, so, the period for filing of appeal would graciously be condoned for the sake of justice.

It is, therefore, requested that the period for filing of appeal may graciously be condoned and appeal may be treated well with in time.

Dated: 06/4 /2020

APPELLANT

THROUGH

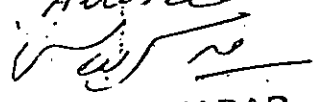
  
 FIDA BAHADAR  
 ADVOCATE SUPREME COURT  
 ABBOTTABAD

13

"ANNEXTURE"  
"A"

SENIORITY LIST OF						
Sl. No.	Sub Division	Name of Teacher	Father's Name	Name of School	Distt.	Grade
1	SDEO (F) BAFFA	LUBNA AMIR	AMIR KHAN	GGPS KULHARAY GHARBI	MANSEHRA	BA/MA
2	SDEO (F) BAFFA	SAJIDA PARVEEN	MUHAMMAD SULTAN	GGPS BAFFA KHURD	MANSEHRA	FA
3	SDEO (F) BAFFA	GUL BIBI	GUL AKBER	GGPS BANDA PIRAN	MANSEHRA	FA
4	SDEO (F) BAFFA	ASMA JAHAN ZEB	JAHAN AEB	GGPS GANDHIAN NO.1	MANSEHRA	FA
5	SDEO (F) BAFFA	NIGHAT PARVEEN	MUHAMMAD FAREED	GGPS GANDHIAN NO.1	MANSEHRA	BA/MA
6	SDEO (F) BAFFA	SUGHRA BEGUM	FARDOQ AHMED KHAN	GGPS GANDHIAN NO.2	MANSEHRA	FA
7	SDEO (F) BAFFA	SHAFQAT BEGUM	SAIN MUHAMMAD KHAN	GGPS GANDHIAN NO.2	MANSEHRA	FA
8	SDEO (F) BAFFA	NAHEEDA NAEEM	MIRZA NAEEMULLAH BAIG	GGPS GANDHIAN NO.2	MANSEHRA	FA
9	SDEO (F) BAFFA	NAGINA NAZ	MUHAMMAD IRFAN	GGPS INAYAT ABAD	MANSEHRA	FA
10	SDEO (F) BAFFA	BIBI SHAHEEN	TAMAS KHAN	GGPS INAYAT ABAD	MANSEHRA	FA
11	SDEO (F) BAFFA	RAFHAT SHAHEEN	MUHAMMAD AYUR	GGCMS TAJAL FAQIR ABAD	MANSEHRA	FA
12	SDEO (F) BAFFA	BIBI RASHIDA	YAQOOB	GGCMS TRANGRI BALA	MANSEHRA	FA
13	SDEO (F) BAFFA	RUKHSANA SHAHEEN	MUHAMMAD MISKEEN	GGPS GULI BAGH	MANSEHRA	FA
14	SDEO (F) BAFFA	BIBI ZUBAIDA	MUHAMMAD IQBAL	GGPS GULI BAGH	MANSEHRA	FA
15	SDEO (F) BAFFA	SHAHEEN BIBI	MOST MUHAMMAD	GGPS TRANGRI PAYEEN	MANSEHRA	BA
16	SDEO (F) BAFFA	SHAHNAZ	ABDUL SALAM	GGPS BAFFA KALAN	MANSEHRA	BA/MA
17	SDEO (F) BAFFA	GUL NAZ	MAKHM KHAN	GGPS BAFFA KHURD	MANSEHRA	BA/MA
18	SDEO (F) BAFFA	CHAN BIBI	ROSHAN KHAN	GGPS EID GAH	MANSEHRA	FA
19	SDEO (F) BAFFA	NIGHAT ZEB	JAHAN ZEB KHAN	GGPS KULHARAY ADAM KHAN	MANSEHRA	BA/MA
20	SDEO (F) BAFFA	SAFIA	ABDUL AM SARWAR	GGPS TANDA	MANSEHRA	FA
21	SDEO (F) BAFFA	RIEMANA	ABDUL	GGPS TANDA	MANSEHRA	FA
22	SDEO (F) BAFFA	ROSHANA BAJNA	ABDUL ZAMAN KHAN	GGPS TANDA	MANSEHRA	BA/MA
23	SDEO (F) BAFFA	CHAN GUI	MUHAMMAD ZAMAN	GGPS TANDA	MANSEHRA	BA/MA
24	SDEO (F) BAFFA	NARGIS	ABDUL KAMAL KHAN	GGPS BAJNA	MANSEHRA	FA
25	SDEO (F) BAFFA	BIBI MAMOODA	MUHAMMAD JAN	GGPS BAJNA	MANSEHRA	BA/MA
26	SDEO (F) BAFFA	SALMA GULFAM	ABDUL FAM	GGPS BAJNA	MANSEHRA	FA
27	SDEO (F) BAFFA	NEELAM BIBI	ABDUL DAYYAN	GGPS BAJNA	MANSEHRA	BA/MA
28	SDEO (F) BAFFA	HUSSAN BANO	ABDUL WAHAB	GGPS LOHAR BANDA KOTLY	MANSEHRA	FA
29	SDEO (F) BAFFA	BIBI ASIA	MUBARAK UR REHMAN	GGPS KORAY	MANSEHRA	FA
30	SDEO (F) BAFFA	BIBI ASIA	MUHAMMAD NAHIR	GGPS ICHRIAN	MANSEHRA	FA
31	SDEO (F) BAFFA	ISHRAT BIBI	SHIRAFAT HUSSAIN	GGPS ICHRIAN	MANSEHRA	BA/MA
32	SDEO (F) BAFFA	SHAHEEN AKHTER	MUHAMMAD IRFAN	GGPS ICHRIAN	MANSEHRA	BA/MA
33	SDEO (F) BAFFA	SABIHA BEGUM	MALIK AMAN	GGPS KULHARAY NARTH	MANSEHRA	FA
34	SDEO (F) BAFFA	BIBI RUKHSANA	MUHAMMAD ISMAIL	GGPS KULHARAY NARTH	MANSEHRA	FA
35	SDEO (F) BAFFA	TAYUBA NAZ	MUHAMMAD IRFAN	GGPS KULHARAY NARTH	MANSEHRA	FA
36	SDEO (F) BAFFA	ISHRAT JAHAN	ANWER ISLAM	GGPS ICHRIAN	MANSEHRA	BA/MA
37	SDEO (F) BAFFA	FARAH GUL	BASHER AHMED	GGPS KOTLY BALA	MANSEHRA	BA/MA
38	SDEO (F) BAFFA	NUSRAT BEGUM	YAR MUHAMMAD KHAN	GGPS KOTLY BALA	MANSEHRA	FA
39	SDEO (F) BAFFA	PARVEEN AKHTER	BADAR UZ ZAMAN	GGPS HILKOT	MANSEHRA	FA
40	SDEO (F) BAFFA	BIBI NAEEDA	MIR ZILE SHAH	GGPS LAMI	MANSEHRA	FA
41	SDEO (F) BAFFA	RUQIYA BIBI	ABDUL SATTAR SHAH	GGPS CHATTER PLAIN	MANSEHRA	BA/MA
42	SDEO (F) BAFFA	BARHT NISA	AZIZ UR REHMAN	GGPS MALKAN	MANSEHRA	BA
43	SDEO (F) BAFFA	AKHTAR LIL NISA	MALIK AMAN	GGPS KUND BALA	MANSEHRA	BA
44	SDEO (F) BAFFA	GUL BANO	AZIZ UR REHMAN	GGPS NAKHOLI	MANSEHRA	FA
45	SDEO (F) BAFFA	BIBI SHAGUFTA	AIZAKAT HUSSAIN SHAH	GGCMS ZAFAR ABAD	MANSEHRA	FA
46	SDEO (F) BAFFA	MERNAZ BIBI	FAZAL UR REHMAN	GGPS NAKHOLI	MANSEHRA	FA
47	SDEO (F) BAFFA	SAIRA BIBI	ABDUL SATTAR SHAH	GGPS MALOOKRA	MANSEHRA	BA
48	SDEO (F) BAFFA	BIBI SHAZIA	MUHAMMAD HUSSAIN SHAH	GGPS KHAKHOD	MANSEHRA	BA
49	SDEO (F) BAFFA	HAMIDA BEGUM	AMANULLAH	GGPS CHRIAN	MANSEHRA	FA
50	SDEO (F) BAFFA	PHULSAQEB	MUHAMMAD IRFAN	GGPS CHATTER PLAIN	MANSEHRA	FA
51	SDEO (F) BAFFA	YASMIN	SHAN UR REHMAN	GGPS BATHAL	MANSEHRA	FA
52	SDEO (F) BAFFA	SUBAIRA	ABDUL SATTAR KHAN	GGPS BATHAL	MANSEHRA	FA
53	SDEO (F) BAFFA	BIBI NAZIR	FAZAL UR REHMAN	GGCMS ZAFAR ABAD	MANSEHRA	FA
54	SDEO (F) BAFFA	TRISHA NAZ	MUHAMMAD FARAZ	GGPS BATHAL	MANSEHRA	FA

Baffa

Attested  
  
**FIDA BAHADAR**  
 Advocate  
 Supreme Court of Pakistan

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

**NOTIFICATION**

The Notification issued this office Encl. No 10529-87 Dated 11/07/2019, the following PSHT/SPSTs are promoted to the post of CT DPS 15 @ Rs: (16120/-1336/-6021) plus usual allowances as admissible under the rules regular basis under the existing policy of the provincial government on the terms and conditions given below are hereby *revised against the stations noted against name with immediate effect.*

No	Name of Teacher	Design	Name of School	Name of School where assigned	Remarks
1	Maseera Begum	PSHT	GGPS Sughdar	GGPS Talhata	Against Vacant Post
2	Smaythia Bano	PSHT	GGPS Sakhi Bala	GGPS Fardesheran	do.
3	Hiba Nazameen	PSHT	GGPS Banti Sadiq	GGPS Banti Sadiq	do.
4	Salma Bibi	PSHT	GGPS Nareer	GGPS Nareer	do.
5	Musarat parveen	SPST	GGPS Ghanoal	GGPS Jareed	do.
6	Gul Rukhsana	PSHT	GGPS Datta NQ01	GGPS Shinkhar	do.
7	Nazreen Gul	PSHT	GGPS Bela Murtan	GGPS Manshera	do.
8	Anika anwar	SPST	GGPS Balhok	GGPS Ghulshan	do.
9	Shir Bano	SPST	GGPS Data No.1	GGPS Shinkhar	do.
10	Bibi Nagha	SPST	GGPS Nareer	GGPS Jareed	do.
11	Shafa Aslam	SPST	GGPS Pw Soolho	GGPS Tawra	do.
12	Chan Gul	SPST	GGPS Tanda	GGPS Tappi	do.
13	Mehnaz Sadiq	SPST	GGPS Shehala	GGPS Muzat Talha	do.
14	Shamha Gul	SPST	GGPS Bhyani	GGPS Tareeh	do.
15	Robina Iqbal	SPST	GGPS Tanda	GGPS Tanda	do.
16	Saba Bibi	SPST	GGPS Jabri	GGPS Tahmi Khurd	do.
17	Gul Naz Akhtar	SPST	GGPS Banti Mera	GGPS Banti Phika	do.
18	Nadia Gul	SPST	GGPS Sheerur	GGPS Miral Abad	do.
19	Bibi Sadiq Kousar	SPST	GGPS Hassari	GGPS Ghulshan	do.
20	Rashida	SPST	GGPS Jagan Dala	GGPS Jagan Dala	do.
21	Shazia Tabasum	SPST	GGPS Datar	GGPS Shinkhar	do.
22	Mehrez Akhter	SPST	GGPS Khan Pur	GGPS Ichhan	do.
23	Nagha	SPST	GGPS Char	GGPS Mera Baharai	do.
24	Rubina Bibi	SPST	GGPS Kachi	GGPS Eigan	do.
25	Nazia Aslam	SPST	GGPS Jabri	GGPS Saman	do.
26	Mah Jabben Mahm	SPST	GGPS Serl Arbora	GGMS Katal	do.
27	Rashida Bibi	SPST	GGPS Chitra Batta	GGMS Mir Galla Kalan	do.
28	Humera Habib	SPST	GGPS Dara	GGMS Suri Khan Abad	do.
29	ALIA BIBI	SPST	GGPS Reerh	GGMS Mera Anjid Ali	do.
30	Rubi Gul	SPST	GGPS Dara	GGMS Al M.Pol	do.
31	Salma Rashed	SPST	GGPS Harala	GGMS Bessund	do.

**TERMS & CONDITIONS:**

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.

**ANNEXTURE** (with signature and stamp)

(14-A)

3. Their services can be terminated at any time in case this performance is found unsatisfactory during probationary period, in case of misconduct he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter as seniority on lower post will remain intact.
6. No TA/DA is allowed to any one.
7. The competent authority reserve the right to rectify the error / omission, if any noted / observed at any stage in instant order issued erroneously.

*SL*  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

Endstt: No. 10872-10906 / Estt; Branch/AE-II/Promotion File

Dated 11/07/20:

Copy of the above is forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Mansehra.
3. Concerned Principal/Head Mistress.
4. Concerned Teachers
5. Office Copy.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

*Attest*  
*[Signature]*  
FIDA BAHADAR  
Advocate  
Supreme Court of Pakistan

✓ 15 "ANNEXTURE"  
"C"

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

### NOTIFICATION

In the light of the notification vide this office Enst.No.10520-10708 Dated 11/7/2019 & 11527-40 Dated 22/07/2019 for Promotion from SPST GPs-14 to PSHT-GPs-25, The following PSHT are hereby adjusted against vacant post on her own pay and grade in the interest of public service with immediate effect.

S.No	NAME OF TEACHER	DESIG:	FROM GGPS	TO GGPS	REMARKS
1	SALEEM AKHTER	SPST	DARBAND	GAMBIAN SERI	AGAINST VACANT PSHT POST
2	CHAN YAJ	SPST	DARBAND	NIKKA PAMI	AGAINST VACANT PSHT POST
3	BIBI HAMEEDA	SPST	LAMI	LAMI	AGAINST VACANT PSHT POST
4	FAIZA BIBI	SPST	IABBA KHANI ZAMAN	IAMBRA	AGAINST VACANT PSHT POST
5	SHAZIA MOBEEN	SPST	OGHI	RASHEEDA OGH	AGAINST VACANT PSHT POST
6	CHAN BIBI	SPST	ED GAM	ED GAM	Post Already Occupied
7	GHAZALA SHAHERN	SPST	KACHI	HAKLAV	AGAINST VACANT PSHT POST
8	NOREEN BIBI	SPST	SH:MUZULLAH KHAN	LISSO	AGAINST VACANT PSHT POST
9	BIBI FARZANA	SPST	IABBA	MEHMOODA	Vice Hato Farhat PST @-12 to be Adjusted at GGPS Mahyar Banda
10	SAJDA BIBI	SPST	SANDAY SAR	Baqran	AGAINST VACANT PSHT POST
11	NIGHAT ZAIB	SPST	MULRAY ADAM KHAN	NARI BATTANG	AGAINST VACANT PSHT POST
12	SARA NOREEN	SPST	DUB NO.1	IMALKOO MERA	AGAINST VACANT PSHT POST
13	SADIA BIBI	SPST	MANSEHRA NO.4	Beer Dasi	AGAINST VACANT PSHT POST
14	SABRA KALA KHAN	SPST	MOHYAN	Bagh Bab	AGAINST VACANT PSHT POST
15	AMBRILN GUL	SPST	BALYANI	RAITH SRASH	AGAINST VACANT PSHT POST
16	SOFIA ANDLEEB	SPST	KALSH SHANKOTE	KALSH SHANKOTE	Post Already Occupied
17	SAMIHA AKABR	SPST	GANDA	CHANIAL	AGAINST VACANT PSHT POST
18	SYEDA ABIDA	SPST	THALER MERA	KHALIAN ARPJAN	AGAINST VACANT PSHT POST
19	SHAZIA BARKAT	SPST	SHEK ABAD	CHANANI	AGAINST VACANT PSHT POST
20	AQEELA NAZ	SPST	SUM PHULRA	SUM PHULRA	AGAINST VACANT PSHT POST
21	BIBI ABIDA	SPST	NARA DOGA	ANL PHULRA	AGAINST VACANT PSHT POST
22	SAIMA NAZ	SPST	CHITTI DENRI	DATTA No.3	AGAINST VACANT PSHT POST
23	SAJDA	SPST	OGHI	TATOLI	AGAINST VACANT PSHT POST
24	BIBI MEHNAZ	SPST	SHERGARH	NANGER MERA	AGAINST VACANT PSHT POST
25	YASMEEN BIBI	SPST	SINGLI	SINGLI	Post Already Occupied
26	PARVEEN AKHTER	SPST	HILKOTE	Mitokore Bittal	Vice Sara Spst to be Adjusted at GGPS Nakhon
27	NIGHAT PARVEEN	SPST	GHANDIAN NO.1	CHITTA BATTA Mans	AGAINST VACANT PSHT POST
28	BARHT PASSA	SPST	MALKAN	MALKAN	Post Already Occupied
29	PHUL SAQIBA	SPST	CHATTER PLAIN	CHATTER PLAIN	Post Already Occupied
30	ANILA GUL	SPST	SINGLE POVEEN	GHANDOL	AGAINST VACANT PSHT POST
31	SHAMILA SERWER	SPST	SANGAR	PATTIAN	Vice Musrat Bibi PST @-12 to be adjusted at GGPS Sangar
32	NIGHAT IABEEN	SPST	PAGHLA	BAGHA	AGAINST VACANT PSHT POST
33	SAJDA YOUNIS	SPST	SHSUNDH	GLIJAR GALI	AGAINST VACANT PSHT POST
34	GUL BANO	SPST	NARKOLI	LACHI MANG	AGAINST VACANT PSHT POST
35	FAIZA RAQEEB	SPST	AHL	CHINARKOTE	AGAINST VACANT PSHT POST
36	SAHIRA IABEEN	SPST	DADAR	BAKKI CHAM	AGAINST VACANT PSHT POST
37	NAZIA BASHIR	SPST	PAGHLA	MERA AMJAD ALI	AGAINST VACANT PSHT POST
38	NABEELA KOSAR	SPST	KACIII	THATHI KALAN	AGAINST VACANT PSHT POST
39	SAIMA BIBI	SPST	CHITTI DENRI	KALWAL	AGAINST VACANT PSHT POST
40	MARGIS BIBI	SPST	HADD BANDI	JANGLAN	AGAINST VACANT PSHT POST
41	RUKIA BIBI	SPST	PHULRA	BUDAKHA	AGAINST VACANT PSHT POST
42	ZAKIA KHAWAJ	SPST	KARORI BALA	KARORI BALA	Post Already Occupied
43	GUL SHAD	SPST	CHAKLI SARIAN	CHAKLI SARIAN	Post Already Occupied
44	AYASHA BIBI	SPST	BAI TIMBER	BAI TIMBER	Post Already Occupied
45	SHAMEEN BIBI	SPST	TRANGRY PAYEEN	CHAPPA FAYEEN	AGAINST VACANT PSHT POST

*Attested*  
*[Signature]*  
**FIDA BAHADAR**  
Advocate  
Supreme Court of Pakistan



16

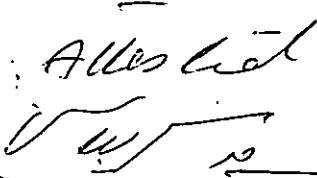
47	IRSHAD JABEEN	SPST	PATTAN DES	KAMAL DARA	AGAINST VACANT PSHT POST
48	TALHAT NAHEED	SPST	MALIK PUR	LALA DA DARA	AGAINST VACANT PSHT POST
49	NAZIA BIBI	SPST	CHITTI MOHARI	MOHRAN DOBA	AGAINST VACANT PSHT POST
50	TALHAT NAHEED	SPST	MANSEHRA NO.1	MARBER	VICE-GOVERNOR TO MANSEHRA
51	FARHA GUL	SPST	KOTLY BALA	JATTAN	Hado-Bandi MC
52	AKHTER NISSA	SPST	KUND BALA	KUND BALA	AGAINST VACANT PSHT POST
53	KOSAR BIBI	SPST	SHANGRIAN	SHANGRIAN	Post Already Occupied
54	Shughtha Bibi	SPST	GGP's Kagal	SUGHDAH	Post Already Occupied
55	Bibi Shama	SPST	GGP's Kagal	Chandani	AGAINST VACANT PSHT POST
56	Sadia Farid	SPST	GGP's Brarkoi	Chandani	AGAINST VACANT PSHT POST
57	Syeda Nuzhat	SPST	GGP's Hado-Bandi	Batang Balakote	AGAINST VACANT PSHT POST
				MERA BADAR ABAD	AGAINST VACANT PSHT POST

Note: - 1. Charge report should be submitted to all concerned.  
 2. No TA/DA is allowed.

  
 DISTRICT EDUCATION OFFICER  
 (FEMALE) MANSEHRA

Endst: No. 11703-68 Dated Mansehra The 24/7 /2019

- Copy Forwarded for information to the:-
1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
  2. Deputy Commissioner Mansehra.
  3. District Monitoring Officer Mansehra.
  4. P/S to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
  5. SDEO (F) Concerned.
  - 6-62 Teachers Concerned

  
 FIDA BAHADAR  
 Advocate  
 Supreme Court of Pakistan

  
 DISTRICT EDUCATION OFFICER  
 (FEMALE) MANSEHRA

حکومت صائب ڈسٹرکٹ انجمن دہلی ماہر

۱۹۹۹  
۱۲/۱۲/۱۹۹۹

صائب ڈسٹرکٹ

ایجنٹ پروموشن کمپنی - ایجنٹ - ایجنٹ

گزشتہ ایک ماہ گورنمنٹ گزٹ پر امری سٹیٹ کی طرف سے ایک نوٹس جاری کیا گیا ہے۔ اس نوٹس کے تحت ایجنٹوں کو اپنی اپنی سرکاری سرنگوں کے بارے میں اپنی معلومات فراہم کرنے کے لیے کہا گیا ہے۔ اس نوٹس کے تحت ایجنٹوں کو اپنی اپنی سرکاری سرنگوں کے بارے میں اپنی معلومات فراہم کرنے کے لیے کہا گیا ہے۔ اس نوٹس کے تحت ایجنٹوں کو اپنی اپنی سرکاری سرنگوں کے بارے میں اپنی معلومات فراہم کرنے کے لیے کہا گیا ہے۔

آپ سے درخواست ہے کہ اس نوٹس کے تحت فراہم کیے گئے معلومات کو بروہو کے لیے اپنی سرکاری سرنگوں کے بارے میں فراہم کیا جائے۔

تعمیرات فراہم کیے جائیں۔

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الغرض  
Robins

Attested  
Fida Bahadar

FIDA BAHADAR  
Advocate  
Supreme Court of Pakistan

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**OFFICE OF THE SUB: DIVISIONAL EDUCATION OFFICER (FEMALE) BAFFA.**

**ORDER.**

Consequent upon her promotion against the post of PSHT by the District Education Officer (Female) Mansehra vide Endst: No. 13587-91/Estt:Branch/AE-II/Promotion File Dated 18-9-2019 Mst: Robina Haider PSHT is hereby adjusted at Govt: Girls Primary School Kotli Loharbanda against vacant post in the interest of public service with immediate effect.

**Note:-**

1. No Ta/DA or TG is allowed.
2. Charge report should be submitted to all concerned.

*[Handwritten Signature]*

SUB: DIVISIONAL EDU: OFFICER  
(FEMALE) BAFFA

Endst: No 524-28

Dated 20/09/2019.

**Copy forwarded to:-**

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. The District Education Officer (F) Mansehra with reference to her Endst: No quoted above.
3. The District Accounts Officer Mansehra.
4. The District Monitoring Officer Mansehra.
5. The Teacher concerned for compliance. *attested*

*[Handwritten Signature]*

FIDA BAHADAR  
Advocate  
Supreme Court of Pakistan

*[Handwritten Signature]*

SUB: DIVISIONAL EDU: OFFICER  
(FEMALE) BAFFA

"F"

درخواست دیہی اور پابندیت

محرم 1441ھ بمطابق 11-07-2019ء کو PSHT نے درخواست دیہی اور پابندیت کی ہے جس میں کہا ہے کہ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/18-2019 ہے جس میں کہا ہے کہ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس درخواست میں کہا ہے کہ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔ اس کے ساتھ ساتھ ایک اور درخواست بھی ہے جس کا نمبر PSHT/24-2019 ہے۔

Attested  
 FIDA BAHADAR  
 Advocate  
 Supreme Court of Pakistan

المقررہ امر  
 27/09/2019

20

"ANNEXTURE"  
"G"

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

**ORDER**

As approved by the competent authority, the Notification of promotion order issued vide D.O. No. 10529-47 Dated 11/07/2019 & adjustment order 11872-10906 Dated 11/07/2019 at Sr. No. 15 in respect of Ms. Robina Haider, SPST against the post of CT at Sr. No. 17 is hereby withdrawn and promoted against the post of PSH BPS-15 @ Rs. (16120-1330-56020) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial government on the following terms and conditions with immediate effect.

**TERMS & CONDITIONS:**

1. She could be on probation for a period of one year extendable for another one year.
2. She will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Her services can be terminated at any time in case his performance is found unsatisfactory during probationary period, in case of misconduct he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Her Inter as seniority on lower post will remain intact.
6. No TA/DA is allowed.
7. The competent authority reserve the right to rectify the error / omission, if any noted/observed at any stage in instant order issued erroneously.

(NAGHMANA SARDAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

Dated 18/9 /2019

Encls: No. 13587-91 /Estt. Branch/AE-II/Promotion File

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Mansehra.
3. Sub Divisional Education Officer (Female) Baffa with the direction to further adjusted against PSH Tipost.
4. Teacher Concerned.
5. Office Copy.

*[Signature]*  
DY. DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

*A. Usteeel*  
*[Signature]*  
FIDA BAHADAR  
Advocate  
Supreme Court of Pakistan





(20-A)  
**DISTRICT EDUCATION OFFICE (FEMALE)**  
**MANSEHRA**



@ [deofmansehra@yahoo.com](mailto:deofmansehra@yahoo.com)



(+92) 0997-300926

Dated: \_\_\_\_\_/2019

No. \_\_\_\_\_

To

The Deputy Commissioner,  
Mansehra.

Subject: **APPEAL FOR JUSTICE.**

Memo:-

Reference to your letter No. 20615 on dated 29-11-2019.

It is to bring in your kind notice that a committee consisting of 08 members was constituted to meet the task of promotion. Decision of promotion regarding Mst: Robina Haider to the post of CT was taken erroneously by the committee which was withdrawn later vide this office order No.13587-91 dated 18-9-2019 as Mst: Robina Haider does not fall in the criteria of CT post.

On 20-9-2019 she was again promoted to the post of PSHT at Govt: Girls Primary School Kotli Lohar Banda vide Sub Divisional Education Officer (Female) Baffa Endst: No. 524-28 against the vacant post.

It is further informed that she could not be promoted at Govt: Girls Primay School Tanda Initially because when she was promoted, the post of PSHT was not vacant at Govt: Girls Primary School Tanda.

*Sd-*  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

Endst: No 18322-23 /ADEO-1

Dated 12 /11 /2019.

Copy to:-

1. Mst: Robina Haider EX-SPST GGPS Tanda presently posted at GGPS Kotli Lohar Banda.
2. Office File.

*Attested*  
*[Signature]*

FIDA BAHADAR  
Advocate  
Supreme Court of Pakistan

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

21

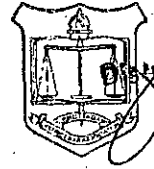
113940

DBA number 152  
 BC No. 

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 Name of Advocate فدا بہادر صاحب

S.No



Secretary General Association of Advocates

وکالت نامہ

بعدالت جج صاحب در ایجنسی سروس کے لیے  
 عنوان: روبینہ حیدر نام حکومت کے لیے وغیرہ  
 منجانب: ایجنسی نوعیت مقدمہ سروس ایجنسی  
 باعث تحریر آنکھ میں سے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ایجنسی اس کا لیے

فدا بہادر صاحب

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار حاصل رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروقت تظیل یا پیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروقت تظیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ کرنے کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختم صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء و ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر تالی و رضی نامہ و فیصلہ بر حلف کرنے اقبال و عیوب دینے کا بھی اختیار ہوگا اور بصورت جانے بیر و نجات از کچہری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا بطرفہ درخواست حکم انتہائی یا قرنی یا قراری قبل از قراری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی تلخیصہ مختارہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیار حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جائزہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔  
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔  
 06/04/2020  
 سال      ماہ      دن

Accepted

فدا بہادر صاحب

Robina

FIDA BAHADAR  
Advocate  
Supreme Court of Pakistan

صفاہ روبینہ حیدر (ایجنسی)

**"A"**

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

No.

JB

APPEAL No. 3978 of 20 20

Met: Rabina Haider

Appellant/Petitioner

Versus

Through Secy' Edn. to Pesh.

RESPONDENT(S)

Counsel  
Notice to Appellant/Petitioner

Fida Bahadar  
Advocate High Court  
at Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15-6-2021 at 9:00 AM

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

at Camp Court A-Head

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



"A"

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

No.

APPEAL No. 3978 of 20 20

118

*mst. Rabina Haider*

Appellant/Petitioner

Versus

*Through Secy: Ector. K.P.H. Pesh.*

RESPONDENT(S)

Notice to Appellant/Petitioner

*mst. Rabina Haider  
P.S.H. Govt. Girls Primary  
School Katli Lohyar Banda  
Tehsil 2 Distt. Mansehra.*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 28/11/17 at 4.00 PM

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

*at Camp Court A. Abud*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"B"**

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

No.

Appeal No..... 3978 ..... of 20 20

Mst. Farzana H. Khan Appellant/Petitioner

Versus

Through Secy, Edu. KPk Pesh. Respondent

Respondent No..... 2 .....

Notice to: —

Distt. Education Officer (Female)  
Manselva.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on..... 11-12-2021 ..... at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No..... dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 31/7

Day of..... July ..... 20 21

at Camp Court Abhattabad

Registrar,

**Khyber Pakhtunkhwa Service Tribunal,**  
**Peshawar.**

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

TB

Appeal No. 3978 of 200

Mst. Rubana Hashid Appellant/Petitioner

Versus

Through Secy. Edn. M.P.C. Pesh. Respondent

Respondent No. 3

Notice to: —

Sub-Divisional Education officer (Female)  
Manselva.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal ~~on 18.07.2001~~ at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. .... dated .....~~

Given under my hand and the seal of this Court, at Peshawar this 27th .....

Day of July 2001

at Camp Court Akhata

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

TB

Appeal No. 3978 of 20 20

Mrs. Rabina Harde Appellant/Petitioner

Versus

Through Secy: Edm: A.P.S. Pesh: Respondent

Respondent No. 4

Nighat Zaid PSHI, Govt. Girls  
Primary School Tawanda Mambhara.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you ~~vide this~~ office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....25/7.....

Day of.....July.....20.....

at Camp Court Akattak

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

TB

Appeal No. 3978 of 20 20

Mst. Robina Haider Appellant/Petitioner

Versus

Through M. A. Khan Respondent

Respondent No. 5  
Nazia Bashir SPST Mora Ahadali  
Manshera

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 17/07/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 8th

Day of July 2021

at Camp Court Abotabad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

1B

Appeal No. 3978 of 2020

Mst. Rubina Haider Appellant/Petitioner

Versus

Through Secy: Ecm: IADP Pesh. Respondent

Respondent No. 6

Nabeela Kalsoo, SPST, Thathi Kalsoo

Notice to: —

Mansoor

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 11-10-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 8/10

Day of July 2022

at Camp Court Akhottabad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**“B”**

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

TB

No.

Appeal No. 3978 of 20 20

Mst: Rabina Haider Appellant/Petitioner

Through Secy: Edu: K.P.T. Pesh. Respondent

Respondent No. 7  
Saima Bibi, SPST, Malinal  
Manshera.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 11-10-20 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....  
 Day of July 20 21

at Camp Court Abbottabad.

Registrar,  
 Khyber Pakhtunkhwa Service Tribunal,  
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
 2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No.....*3578*..... of 20*20*

*Mst. Rabia Maqsood*.....Appellant/Petitioner  
Versus

*Through Secy. Edn. K.P.S. Pesh.* Respondent

Respondent No.....*8*.....

Notice to: —

*Nargis Bibi (SPST) Janglan Mansab*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....*11-10-2020*.....at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....*5/10*.....  
Day of.....*July*....., 20*20*

*at Peshawar*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



**"B"**

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

No.

Appeal No.....3978..... of 20 20

.....Mst. Rabina Haider.....Appellant/Petitioner

Versus

.....through Secy: Edm. K.P.L. Pesh:.....Respondent

Respondent No.....10.....

Notice to: —

Nazia Bibi, SPST, Mohran Doga,  
Manshera.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....11-10-2021.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal~~ has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....6th.....

Day of.....July.....2021

[Signature] at Camp Court Abbottabad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.