

22.09.2022

Appellant present through counsel.

Kabir Ullah Khattak, Additional Advocate General alongwith Fahim Khan Assistant for respondents present and instead of submitting reply, two different office orders were produced vide which sanction was accorded to the grant of M.Phil Allowance with immediate effect. Now the question before this Tribunal is not in respect of the sanction to the grant of M.Phil Allowance rather the issue is in respect of the date as to from which date the lady appellant would be entitled to get the same. Despite last opportunity, comments were not submitted. Cost of Rs.5000/- was also not paid. As sanction has already been accorded, therefore, instead of closing their right to submit comments, case is adjourned with direction to submit comments positively on the next date alongwith cost of Rs.5000/-. To come up for comments and payment of cost on 16.11.2022 before S.B at Camp Court, Abbottabad.



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

21.12.2021

None for the appellant present. Mr. Asif Masood,
DDA for respondents present.

Notices to the respondents have not been issued,
therefore, notices be issued to the respondents for
submission of written reply/comments. Notices be also
issued to the appellant and her counsel for appearance.
Adjourned. To come up for written reply/comments
before S.B on 17.02.2022 at camp court Abbottabad.

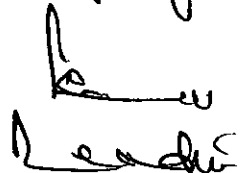


(Salah Ud Din)
Member(J)

Camp Court Abbottabad

17-2-22 :-

Due to retirement of worthy chairman
case is adjourned. To come up for
the same on 21/7/22.



21.07.2022

Appellant alongwith his counsel present. Mr. Jehangir
Khan, Assistant alongwith Mr. Kabirullah Khattak, Additional
Advocate General for the respondents present and sought time
for submission of reply/comments. Last opportunity granted
subject to payment of cost of Rs. 5000/-, failing which their right
for submission of reply/comments shall be deemed as struck off.
Adjourned. To come up for submission of reply/comments on
22.09.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)
Member (J)

Camp Court Abbottabad

12.10.2021

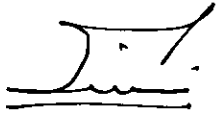
Mr. Kalimullah, Advocate, for the appellant present.
Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant was appointed as S.S Biology vide appointment order dated 03.08.2018; that the appellant has completed her M.Phil Degree from Hazara University on 1st April 2018, therefore, she was entitled to have been granted allowance of Rs. 2500/- per month in light of Notification dated 14.07.2016, however the same has not been granted to the appellant; that the departmental appeal of the appellant was not responded, therefore, the appellant has filed the instant service appeal for redressal of her grievance.

Points raised need consideration, hence the appeal is admitted to regular hearing subject to all legal and valid objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 21.12.2021 before the S.B at Camp Court Abbottabad.

Appellant Deposited
Security & Process Fee

78/16/09


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



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Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4516/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/03/2021	<p>The appeal of Mst. Shumaila Rafiq received today by post through Mr. Kaleemullah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;">REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19-7-21</u>. Notices be issued to appellant/counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	3-6-21	<p>19.07.2021</p> <p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for 12.10.2021 for hearing before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

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

Service Appeal No. _____/2021

Shumaila Rafiq D/o Muhammad Rafiq Subject Specialist (Biology)
(BPS-17) GGHSS Kangra, Haripur.

...APPELLANT**VERSUS**

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

...RESPONDENTS**SERVICE APPEAL****INDEX**

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service Appeal alongwith affidavit	1 to 7	
2.	Copy of appointment letter	8 to 12	"A"
3.	Copy of Attested /verified M.Phil Degree	13-14	"B"
4.	Copy of Notification	15	"C"
5.	Copy of salary slips	16	"D"
6.	Copy of departmental appeal & Reciept	17-18A	"E"
7.	Wakalatnama	19	

Through

Dated: 28/03/2021

4
...APPELLANT
(KALIMULLAH)

Advocate High Court, Abbottabad

1

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

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4390 Service Appeal No. 2516 /2021

Dated 31/3/2021

Shumaila Rafiq D/o Muhammad Rafiq subjects Specialist (Biology)
(BPS-17) GGHSS Kangra, Haripur.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar.
2. District Education Officer (Female), Abbottabad.
3. Director Elementary & Secondary Education, KPK, Peshawar.
4. District Accounts Officer, Abbottabad.
5. District Education Officer (Female) Haripur.
6. District Account officer, Haripur.

...RESPONDENTS

Filed to-day

ew
Registrar

31/03/2021

**SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT**

APPELLANT IS SERVING AS SUBJECT SPECIALIST (BIOLOGY) BPS-17 IN THE RESPONDENT'S DEPARTMENT SINCE 03/08/2018 BUT SHE HAS NOT BEEN ALLOWED/SANTIONED THE M.PHIL ALLOWNCEC AT THE RATE OF 2500/= PER MONTH W.E.F 03 /08/2018 TO ONWARDS WHICH IS AGAINST THE LAW, DISCRIMINATORY, PERVERSE, RULES AND REGULATIONS.

==

Respectfully Sheweth: -

1. That the appellant got appointment as S.S (biology) on 03/08/2018. Copy of appointment letter is annexed as Annexure "A".
2. That the appellant completed her M.Phil. Degree Program from the Recognized university i-e Hazara University on 21st April

2018. Copy of Verified /Attested copy of MPhil Degree is attached as Annexure "B".

3. That as Per Notification the Govt of KPK sanctioned M.Phil Allowance at the rate of 2500/= Per Month to those employees having the same degree. Copy of Notification is attached as Annexure "C"
4. That the department has not sanctioned /Paid MPhil allowances to the appellant w.e.f. 3/08/2018 onward which is against the law, Discriminatory, Perverse against the Policy.
5. That it is worth to mention here that all those similar employees whose Qualification is MPhil have been paid M.Phil. Allowances but the appellant has not been paid due to personal grudge, malafide and malice of the respondents' department which is discriminatory against the law and rules and regulation. Copy of salary slip of Appellant is Attached as Annexure "D".

6. That feeling aggrieved the appellant filed departmental appeal before the next higher authority on 28/10/2020 Through Registered Ad. Copy of departmental appeal Dated 28-10-2020, along with Registered Receipt and other applications to the concerned authorities for doing needful are attached as Annexure " E". But the reply is still awaited. Hence, the instant service appeal is filed inter-alia on the following grounds:-

GROUNDS:-

- a) That conduct of the respondents towards the appellant is discriminatory perverse against the law and policy in vogue.
- b) That the appellant served the department by the sweat of her brows to earn her bread and butter. The appellant is eligible for MPhil Allowances w.e.f 03/08/2018

to onwarss, but the same has not been Allowed to the appellant which is against the fundamental rights as enshrined in the constitution

c) That when law authorizes the appellant for payment of her MPhil allowances, then the department is supposed to follow the law. That non-payment of MPhil Allowances to the appellant amounts to misconduct on the part of the respondents.

d) That the matter relates to the terms and conditions of services. Therefore, this Honourable Tribunal has jurisdiction to entertain the service appeal under Article 212 of the constitution.

e) That other legal and factual points involved in this case shall be agitated

before the Honourable Tribunal at the time of arguments.


It is, therefore, humbly prayed that on acceptance of the instant service appeal, it is humbly Prayed that MPhil allowances @ Rs 2500 /= per month may Graciously be ordered to be paid to the appellant w.e.f 3 -08-2018 to Onwards .

Any other relief which this Honourable Court deems appropriate fit and proper in the circumstances of the case may also be granted.


...APPELLANT

Through

Dated: 28/03/2021


(KALIMULLAH)

Advocate High Court, Abbottabad

VERIFICATION: -

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


...APPELLANT

BEFORE THE SERVICE TRIBUNAL, KHYBER

PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2021

Shumaila Rafiq D/o Muhammad Rafiq Subject Specialist (Biology)
(BPS-17) GGHSS Kangra, Haripur.

...APPELLANT

VERSUS

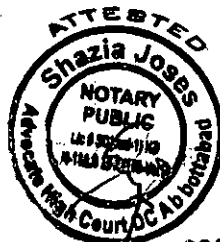
Govt. of Khyber Pakhtunkhwa, through Secretary Elementary &
Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Shumaila Rafeeq Subject Specialist (Statistic) (BPS-17) GGHS Keri Raiki, Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



28 MAR 2021


DEPONENT

P-8

Annex "A" 7/8/18



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Fax # 091-9211419

Dated Peshawar the August 1st, 2018**NOTIFICATION**

No.SO(S/F)E&SED/3-2/2018/Recruitment/SS/DPE/BS-17/Female: Consequent upon this department notification of even No. dated 31-07-2018, posting/ transfer/ adjustment in respect of the following Female Subject Specialists & Instructor Physical Education (BS-17) are hereby ordered in the interest of public service with immediate effect:

S#	Name & Father Name of Candidate	As Proposed
SS (Pak Study) BS-17		
1	Salma Syed D/O Syed Usman Ali Shah	GGHSS Ismail Mamakhel Bannu
2	Rukhsana Begum D/O Ghulam Daud Khan	GGHSS Kotka Bilawar Khan Bannu
3	Salma Begum D/O Khair Ul Aman	GGHSS Dhakki Charsadda
4	Attia Bibi D/O Ali Haider	GGHSS Bala Kot Mansehra
5	Wajeeha Javed D/O Muhammad Javed	GGHSS Oghi Mansehra
6	Anam Murad D/O Murad Ali Khan	GGHSS Ghoriwala Bannu
7	Rabia Bibi D/O Sikandar Khan	GGHSS Akarpura Nowshera
8	Sara Javed D/O Javed Ahmad Khan	GGHSS Rustam Khel Mardan
9	Mumtaz D/O Wali Zar Khan	GGHSS Bilot Sharif D.I. Khan
SS (English) BS-17		
10	Maryam Fatima D/O Mehmood Sultan	GGHSS GGHSS Gar Munara Swabi
11	Saira Shahab D/O Muhammad Shahab Dabar	GGHSS Khyber Colony Peshawar
12	Sobia Afsar D/O Muhammad Afsar	GGHSS Lora Abbottabad
13	Rabia Qureshi D/O Muhammad Hafeez Qureshi	GGHSS Darband Mansehra
14	Saida Akhtar D/O Muhammad Gul	GGHSS Teri Karak
15	Savera Khan D/O Ihsan Ullah Khan	GGHSS Khyber Colony Peshawar
16	Samreen Alam D/O Alam Khan	GGHSS Mandani Charsadda
17	Nayab D/O Yar Khan	GGHSS Turangzai Charsadda
18	Hira Khurshid Khan D/O Muhammad Khurshid Khan	GGHSS Tarawara Mansehra
19	Hajeema Bibi D/O Hasil Khan	GGHSS Garam Chashma Chitral
20	Rakhshanda Rani D/O Fazal Sher	GGHSS Badwan Dir Lower
21	Ibtisam D/O Alla Ud Din	GGHSS Sakhiakot Malakand
22	Shabana Sarwar D/O Ghulam Sarwar	GGHSS Adina Swabi
23	Sofia Rubab D/O Khushdil Khan	GGHSS Esak Chountra Karak
24	Azra Khatoon D/O Kamdar Khan	GGHSS Zarooobi Swabi
Instructor Physical Education (BS-17)		
25	Gul Rukh D/o Shaukat Ali	GGHSS Kathi Garhi Mardan

Attended
KALIMULLAH
ADVOCATE-AT-LAW

adul
01/08/18

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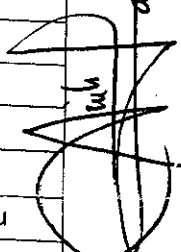
148

26	Kalsoom Gul Said D/O Gul Said	GGHSS Chamdheri Mardan
	Kalsoom Bibi D/O Muhammad Iqbal	GGHSS Dhalan Hangu
28	Saniya D/O Amir Ur Rehman	GGHSS Gar Munara Swabi
29	Fatima Salahuddin D/O Muhammad Salahuddin	GGHSS Ziarat Kaka Sahib Nowshera
30	Anila Ali D/O Nazar Ali Khan	GGHSS Qamar Zaman Mandew Bannu
31	Sara Bibi D/O Fazal Akbar	GGHSS Mohib Banda Nowshera
32	Hina Safdar D/O Safdar Shah	GGHSS Khazana Dheri Mardan
33	Husan Aara D/O Faiz Mahmood	GGHSS Shalbandai Bunir
34	Tasnim Shah D/O Fazli Rahman	GGHSS Kalakalay Swat
35	Saima D/O Fazal Ahad	GGHSS Kityari Dir Lower
36	Farzana Ihsan D/O Ihsan Ullah	GGHSS Ziam Charsadda
37	Summiya Kokub D/O Sadique Ur Rehman	GGHSS Lissan Nawab Mansehra
38	Azka Batool D/O Saadat Shah	GGHSS Garhi Phulgran Abbottabad
39	Husna Razzaq D/O Abdur Razzaq	GGHSS Wari Dir Upper
40	Asmat Tahira Ali D/O Mirza Ali Khan	GGHSS Mullazai Tank
41	Noshin Bibi D/O Khan Afsar	GGHSS Nordi Haripur
42	Nadia Gul D/O Risal Khan	GGHSS Dak Ismail Khel Nowshera
43	Jasmin Naz D/O Bahadar Sher	GGHSS Adina Swabi
44	Nadra Naz D/O Amir Rahim	GGHSS Palai Malakand
45	Saira Daud D/O Muhammad Daud	GGHSS Sirikot Haripur
46	Samina Bibi D/O Shamrez Khan	GGHSS Kirri Raiki Abbottabad
47	Sana Rahman D/O Ghulam Rahmani	GGHSS Par Hoti Mardan
48	Hajira Naeem D/O Naeem Shah	GGHSS Azakhel Payan Nowshera
49	Rozeena D/O Said Roz Khan	GGHSS Matta Palangzai Charsadda
50	Mehwish Bibi D/O Nazir Ahmed	GGHSS Phulra Mansehra
51	Saira Iftikhar D/O Aftab Ud Din	GGHSS Uztarzi Kohat
52	Sofia Naz D/O Nisar Ahmad	GGHSS Ghalladher Mardan
53	Atia Begum D/O Dawar Khan	GGHSS Kalpani Bunir
54	Hifsa D/O Fazal E Qahar	GGHSS Khadagzai Dir Lower
55	Sunbal Amin D/O Fazal Amin	GGHSS Rustam Mardan
56	Arfa Syed D/O Zahir Shah	GGHSS Mumbati Barakzai Bannu
57	Yamna Sarwar D/O Mohammad Sarwar Khan	GGHSS Tarrowara Mansehra
58	Shaista Kanwal D/O Asif Khan	GGHSS Sokai Mardan
59	Sidra D/O Faiz Ur Rehman	GGHSS Zaroobi Swabi
60	Saima Naz D/O Khaista Gul	GGHSS Agra Malakand
61	Maryam Bibi D/O Khan Muhammad	GGHSS Shakardara Kohat
62	Shabina Gul D/O Samin Gul	GGHSS Alo Mardan
63	Hina Shabir D/O Shabir Ahmad Qureshi	GGHSS Shergarh Mansehra
64	Shagufta Javed D/O Javed Khan	GGHSS Nizam Pur Nowshera
65	Sundas Iqbal D/O Muhammad Iqbal	GGHSS Khanpur Haripur
66	Rahat Qazi D/O Qazi Nazir Din	GGHSS Kohi Barmol Mardan

Attorney
KALIMULLAH ATD
ADVOCATE

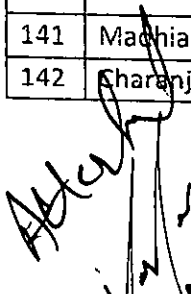
01/04/18

67	Maria Sajid D/O Muhammad Sajid	GGHSS Bandi Muneem Haripur
	Bibi Asia D/O Muhammad Iqbal	GGHSS Baja Swabi
69	Hina Muhammad Qasim D/O Muhammad Qasim	GGHSS Dheri Kati Khel Nowshera
70	Samina Nisar D/O Nisar Ahmad	GGHSS Ningolai Swat
SS (Physics) BS-17		
71	Bibi Azia D/O Inayat Ullah Khan	GGHSS Teri Karak
72	Munazza Shah Jehan D/O Shah Jehan	GGHSS Chakdara Dir Lower
73	Nadia Bibi D/O Ashiq Ellai	GGHSS Panian Haripur
74	Shazia Riaz D/O Haji Muhammad Riaz	GGHSS Sherwan Abbottabad
75	Nazia Hamid D/O Hamid Ul Jalal	GGHSS Warijun Chitral
76	Tayyaba Iqbal D/O Abdul Sajeed Khan	GGHSS Gumbat Kohat
77	Naveeda Naz D/O Faqir Muhammad	GGHSS Kunda Swabi
78	Farhana Bibi D/O Haq Nawaz Khan	GGHSS Aladhand Malakand
79	Humera Syed D/O Syed Rasool	GGHSS Ghazni Khel Lakki Marwat
80	Muzdalfa Khan D/O Munir Akhter	GGHSS Kuthiala Abbottabad
81	Anisa Qazi D/O Qazi Kifayat Ullah	GGHSS Utmanzai Charsadda
82	Sidra Yousaf D/O Muhammad Yousaf	GGHSS Ghoriwala Bannu
83	Shafaq Riaz D/O Riaz Qureshi	GGHSS Mithapur D.I.Khan
84	Farah Afridi D/O Mohammad Nazeer Afridi	GGHSS No. 2 Pabbi Nowshera
85	Ruqia Bibi D/O Muhammad Rafique	GGHSS Bandi Muneem Haripur
86	Toheed Bibi D/O Muhammad Islam	GGHSS Chamdheri Mardan
87	Rameeza Khalid D/O Khalid Khan	GGHSS Hathian Mardan
88	Hina Haider D/O Shoukat Pervez	GGHSS Richbin Abbottabad
89	Farzana Elahi Bakhsh D/O Allah Wasaya	GGHSS Paharpur D.I.Khan
SS (Stats) BS-17		
90	Hira Feroz D/O Feroz Ahmad	GGHSS Ismail Mamakhei Bannu
91	Sundus Amin D/O Farhat Amin	GGHSS Nar Shakirullah Bannu
92	Balqees Gul D/O Inayatullah	GGHSS Kakki Bannu
93	Sameena D/O Sheraz Gul	GGHSS Nowshera Cantt
94	Mehvish Bibi D/O Muhammad Riaz	GGHSS Sherwan Abbottabad
95	Marwarid Rehman D/O Abdur Rehman	GGHSS Mullazai Tank
96	Ayesha Rehman D/O Shah G Ur Rehman Khan	GGHSS No. 1 Mardan
97	Sadaf Ashraf D/O Ashraf Khan	GGHSS Kotka Bilawar Khan Bannu
98	Faiza Gul D/O Summar Gul	GGHSS Badrashe Nowshera
99	Abida D/O Almas Khan	GGHSS Wadpaga Peshawar
100	Salma D/O Mirdad Khan	GGHSS Richbin Abbottabad
101	Tahira Aziz D/O Aziz Ur Rehman	GGHSS Teri Karak
102	Madeeha D/O Muhammad Jehan	GGHSS Taru Jaba Nowshera
103	Rajuly Naz D/O Bulan Jan	GGHSS Akora Khattak Nowshera
104	Alia Manzoor D/O Malik Manzoor Hussain	GGHSS Balakot Mansehra
105	Humaira Nasim D/O Nasim Ullah	GGHSS Pirpai Nowshera


 01/01/18

ATTORNEY
 KALAMULLAH AHMAD
 ADVOCATE

106	Sumaira Shahab D/O Babu Khan	GGHSS Gandigar Dir Upper
107	Asma Mumtaz D/O Mumtaz Ali	GGHSS Azakhel Payan Nowshera
108	Mehwish Nazir D/O Nazir Gul	GGHSS Gumbat Kohat
SS (Biology) BS-17		
109	Rozina D/O Inayatullah	GGHSS Adina Swabi
110	Salma Shaheen D/O Ajmal Khan	GGHSS Gujar Ghari Mardan
111	Zill E Huma D/O Muhammad Zaman	GGHSS Gar Munara Swabi
112	Zoona Fazal Ur Rehman D/O Fazal Ur Rehman	GGHSS Behali Mansehra
113	Hina Muhammad D/O Atta Muhammad	GGHSS Manki Sharif Nowshera
114	Shumaila Rafiq D/O Muhammad Rafiq	GGHSS Sherwan Abbottabad
115	Sumbal Iqbal D/O Muhammad Iqbal Shah	GGHSS Mandani Charsadda
116	Sundas Seemab D/O Ghulam Sardar	GGHSS Lachi Kohat
117	Afsha Akhtar D/O Faiz Akbar	GGHSS Muradpur Mansehra
118	Syeda Sarwat Saeed D/O Saeedullah Jan	GGHSS Garam Chashma Chitral
119	Faiza Gul D/O Sabir Waheed	GGHSS Gumbat Kohat
120	Baseerat Fida D/O Fida Mohammad	GGHSS Ghala Dher Mardan
121	Rahila Taj D/O Ali Rehman	GGHSS Kirri Raiki Abbottabad
122	Lubna Jamal D/O Sahib Jamal	GGHSS Mohib Banda Nowshera
123	Rehana Gul D/O Muhammad Qasim	GGHSS Ghazni Khel Lakki Marwat
SS (Maths) BS-17		
124	Rakhshanda Yousaf D/O Muhammad Yousaf	GGHSS Ghoriwala Bannu
125	Ayesha Bibi D/O Muhammad Siddique	GGHSS Oghi Mansehra
126	Sumaira Tabraiz D/O Muhammad Tabraiz	GGHSS Sirikot Haripur
127	Ambreen Durrani D/O Atlas Khan Durrani	GGHSS Tarnab Farm Peshawar
128	Sehrish D/O Liaqat Ali Khan	GGHSS Sawal Dher Mardan
129	Rabia Naheed D/O Mufti Muhammad Javed Iqbal	GGHSS Larama Peshawar
130	Noreen Shoukat D/O Shoukat Ali Shah	GGHSS Ziarat Kaka Sahib Nowshera
131	Kainat Fareed D/O Fareed Ullah Jan	GGHSS Mathra Peshawar
132	Huma Saleem D/O Muhammad Saleem Khan	GGHSS Totalai Bunir
133	Zaiba Said D/O Amir Said	GGHSS Nishtarabad Peshawar
134	Sumayya Gul D/O Gul Shah Abbas	GGHSS Karak
135	Asma Ashraf D/O Ashraf Khan	GGHSS Teri Karak
136	Shumaila Tufail D/O Muhammad Tufail Khan	GGHSS Gandhian Mansehra
137	Shakila Rahim D/O Rahim Fida	GGHSS Shiaqotek Chitral
138	Samina Majeed D/O Abdul Majeed	GGHSS Warijun Chitral
139	Sadaf Jamal D/O Jamal Nasir	GGHSS Esak Chountra Karak
Minority/ Disable Quota		
140	Basraja D/O Spin Gul	SS (Statistics) BS-17 GGHSS Azakhel Bala Nowshera
141	Machia Javed Awan D/O Javed Sultan Awan	SS (Econ) BS-17 GGHSS Lora Abbottabad
142	Charanjeet Kour D/O Bheem Sain	SS (Econ) BS-17 GGHSS Par Hoti Mardan


KHALIDULLAH A.D.
ADVOCATE


 06/12/18

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143	Shaista Kanwal D/O Rafiq Jalal	IPE (BS-17) GGHSS Kandari Mardan
144	Pooja But D/O Gobind Ram	IPE (BS-17) GGHSS Punjtar Bunir
145	Nehayat Noreen D/O Ali Ur Rehman	IPE (BS-17) GGHSS Nar Shakirullah Bannu
146	Shazia Akbar D/O Akbar Masih	SS (Maths) BS-17 GGHSS Manki Sharif Nowshera

2. No TA/DA for joining their duty.

SECRETARY

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director (Recruitment), Khyber Pakhtunkhwa Public Service Commission, Peshawar.
4. District Education Officers (Female) concerned.
5. District Accounts Officers concerned.
6. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
7. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
8. Incharge EMIS, E&SE Department for uploading at official website.
9. PS to Secretary E&SE Department.
10. Subject Specialists & Instructor Physical Education concerned.
11. Office order file.

Ali
alin
01/08/18
(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)

Ali
KAZIMULLAH ATD
ADVOCATE

01/24
29/11/18
2/8/18

Serial No. 002119

Annex B

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Registration No. 14-M.PHIL-BOT-S-HU-16

Roll No. 36207

P-13

HAZARA UNIVERSITY

Mansehra, Pakistan




The Syndicate of the Hazara University

on the Recommendation of Board of Advanced Studies & Research has conferred upon

Mr / Ms Shumaila Rafiq Son / Daughter of Muhammad Rafiq

The Degree of **MASTER OF PHILOSOPHY**
in Botany

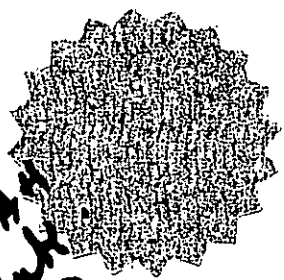
Together with all honours rights and privileges pertaining to that degree.


Controller of Examinations
Date 21-04-2018


Vice Chancellor


Registrar

KARIMULLAH
ADULAH
ATD



P-14



**OFFICE OF THE PRINCIPAL GOVT GIRLS HIGHER
SECONDARY SCHOOL KANGRA COLONY HARIPUR**

Email:hr7154gghs@gmail.com Ph#0995-353507

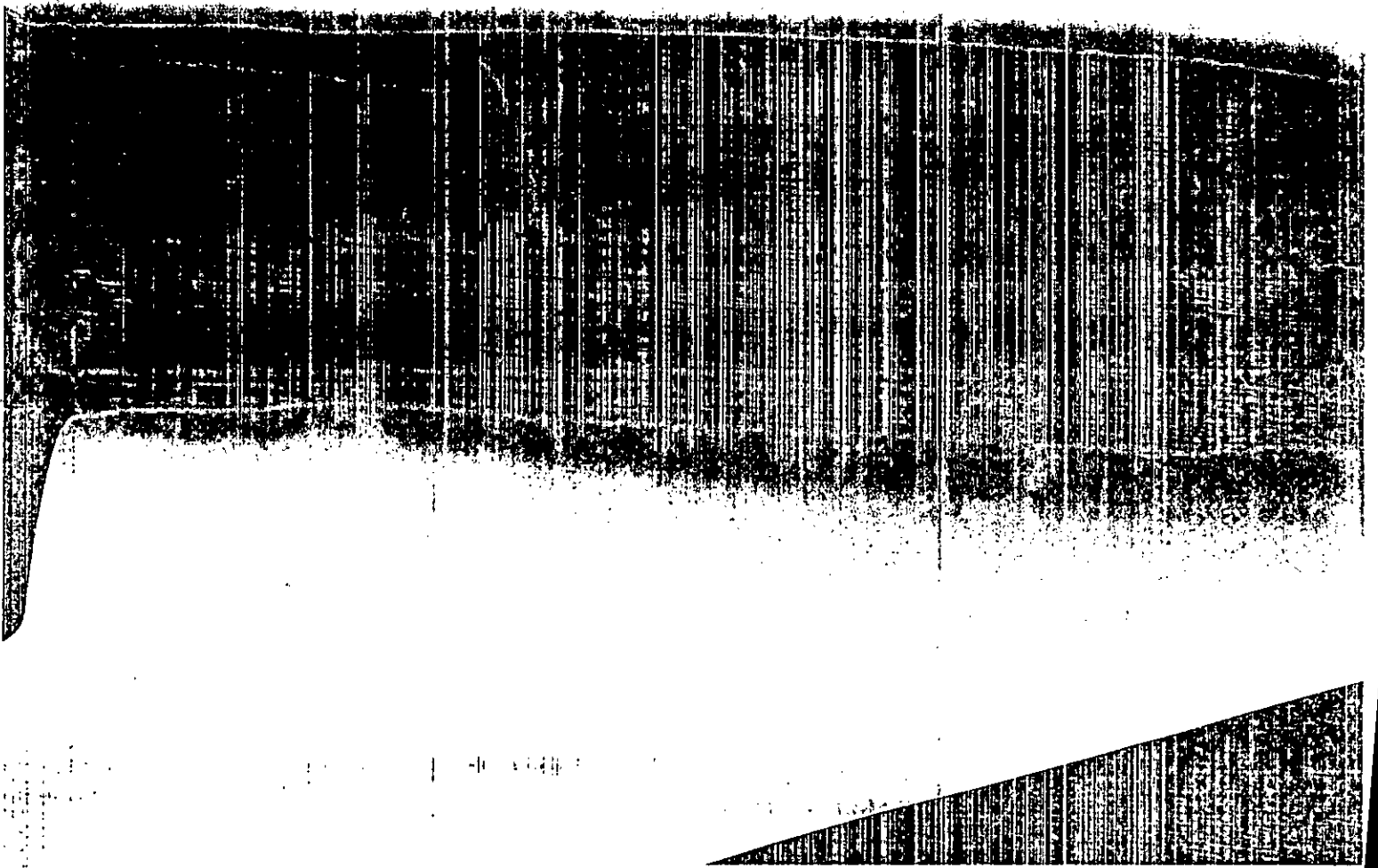
DOCUMENTS GENUINE CERTIFICATE

To whom it may concern

It is certified that Miss Shumaila Rafique is working on SS(BIO) post in BPS-17.
I have checked her documents they were found clear and genuine.

*Accepted by
WALIMULAH
ADVOCATE.*

Principal
GGHSS
Kangra Colony
DOP
[Signature]
Principal
BPS-17
GGHSS Kangra Haripur





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Annex "C"

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD/SO(SR-II)/8-14/2016.
Dated Peshawar the: 14/07/2016

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

Subject: GRANT OF M.PHIL ALLOWANCE @ RS.2,500/- PER MONTH

Dear Sir,

The Competent Authority, is pleased to decide that, all those who acquires/possesses the degree of M.Phil recognized by the H.E.C. shall be allowed M.Phil allowance @ 25% of the existing amount of Ph.d Allowance (i.e. Rs.2,500 per month) with effect from 01/07/2016 subject to the following conditions:-

- a) M.Phil allowance will not be admissible to those who are getting Ph.D allowance @ Rs.10,000/- per month.
- b) M.Phil allowance will not be admissible to those who have already got the benefit of advance increments possessing on / acquiring M.Phil degree prior to 01/12/2001 under Finance Department circular letter No.FD(SR-I)/1-67/82 dated 24/08/1983.

Attended
by Mr
KAMRAN
RAVISED.

SECRETARY TO GOVERNMENT
OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Endst: FD (SOSR-II)/8-14/2016.

Dated Peshawar the 14th July, 2016

A Copy is forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Secretaries to Government of Punjab, Sindh and Balochistan, Finance Department.
3. All Heads of Autonomous / Semi Autonomous Bodies in Khyber Pakhtunkhwa.

(RAZAULLAH)

Additional Secretary (Reg.)

P.T.O

Dist. Govt. NWFP-Provincial
District Accounts Office Haripur
Monthly Salary Statement (January-2021)

P-16

Annex "D"

Personal Information of Mr SHUMAILA RAFIQ d/w/s of MUHAMMAD RAFIQ:

Personnel Number: 00782960
Date of Birth: 11.02.1987

CNIC: 1330233668366
Entry into Govt. Service: 08.12.2015

NTN:
Length of Service: 05 Years 01 Months 025 Days

Employment Category: Active Temporary

Designation: SUBJECT SPECIALIST

80002252-DISTRICT GOVERNMENT KHYBE

DDO Code: HR6214-GGHS KANGRA COLONY

Payroll Section: 003

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: No

GPF Balance:

139,600.00

Vendor Number: -

Pay scale: BPS For - 2017

Pay Scale Type: Civil

BPS: 17

Pay Stage: 3

Pay and Allowances:

Wage type	Amount	Wage type	Amount
0001 Basic Pay	37,270.00 ✓	1000 House Rent Allowance	4,433.00 ✓
1210 Convey Allowance 2005	5,000.00 ✓	1974 Medical Allowance 2011	1,500.00 ✓
2211 Adhoc Relief All 2016 10%	2,544.00 ✓	2224 Adhoc Relief All 2017 10%	3,727.00 ✓
2247 Adhoc Relief All 2018 10%	3,727.00 ✓	2265 Adhoc Relief All 2019 05%	1,863.00 ✓

Deductions - General

Wage type	Amount	Wage type	Amount
3017 GPF Subscription	-4,270.00	3501 Benevolent Fund	-800.00
3609 Income Tax	-411.00	3990 Emp. Edu. Fund KPK	-250.00
4004 R. Benefits & Death Comp:	-900.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount:	Deduction	Balance

Deductions - Income Tax

Payable: 5,319.73 Recovered till January-2021: 1,936.00 Exempted: 1329.78 Recoverable: 2,053.95

Gross Pay (Rs.): 60,064.00

Deductions: (Rs.): -6,631.00

Net Pay: (Rs.): 53,433.00

Payee Name: SHUMAILA RAFIQ

Account Number: 0010036676180015

Bank Details: ALLIED BANK LIMITED, 250190 ABL K.T.S. HARIPUR K/T TOWN SHIP, HARIPUR

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: HOUSE NO. 717 STREET NO. 4, SECTOR NO. 4

City: HARIPUR

Domicile: NW - Khyber Pakhtunkhwa

Temp. Address:

Email:

City:

Housing Status: No Official

Signature

Principal
BPS-18
District Accounts Office Haripur

26 / 02 / 21

Signature
KALIMULLAH
SUBJECT

Annex "E"
P-17

To

- i. The District Education Officer (Female) Haripur
- ii. The Director Elementary and secondary Education
KPK Peshawar

Subject: **DEPARTMENTAL APPEAL / REPRESENTATION
FOR THE GRANT OF M.PHIL ALLOWNCE**

Sir,

1. The appellant write to submit as under;-
 - a. It is submitted that the appellant is serving as Subject specialist (Bio) BPS-17 since, 03-08-2018. Copy of Appointment order of the appellant is attached herewith.
 - b. That as per Notification, the Govt of KPK Sanctioned the M.Phil allowance at the rate of 2500/= Per Month. Hence as per Notification the department has allowed the said allowance to the appellant.
 - c. That the appellant completed her M.Phil degree Program from the Recognized university i-e Hazara University on 21 April 2018, Hence the appellant is eligible to get her M.Phil allowance from the date of joining of service i-e 03-08-2018 to onward but same is being not allowed which is Discriminatory, against the law & Rules and policy. Attested copy of M.Phil Degree is attached herewith.

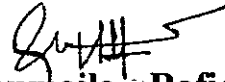
Attested
by
KHALIDULLAH
ADVOCATE

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d. That the appellant filed the applications to the concerned authority for doing the needful but of no avail. Copies of applications are attached herewith.

In view of the above it is humbly requested that M.Phil Allowance amounting 2500/= per months may be Granted to the appellant w-e-f 3-08-2018 to onwards.

Yours truly,



Shumaila Rafiq D/o Muhammad

Rafiq

Subject Specialist (Biology) BPS-17

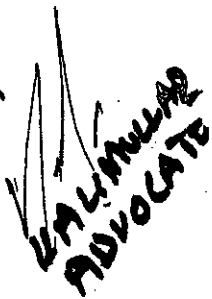
GGHSS Kangra, Haripur.

Dated: 28/10/2020

Copy to:

- Principle GGHSS Kangra, Haripur
- District Account officer, Haripur

Attached
27


ADVOCATE

P-18-A

No. 48

For Insurance Notices see reverse.
Stamp RGL46653848

uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered* addressed to _____ Date-Stamp _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Initials of Receiving Officer _____ (in words)

Insured for Rs. (in figures) _____

If insured	Insurance fee Rs. _____ Ps. _____	Weight (in words) _____	Kilo _____
	Name and address of sender _____		Grams _____

Postage 2/-

No. 49

For Insurance Notices see reverse.
Stamp RGL46653849

uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered* addressed to _____ Date-Stamp _____

*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Initials of Receiving Officer _____ (in words)

Insured for Rs. (in figures) _____

If insured.	Insurance fee Rs. _____ Ps. _____	Weight (in words) _____	Kilo _____
	Name and address of sender _____		Grams _____

Postage 2/-

S.No. _____

Name of Advocate **136000 KALIMULLAH**

DBA NO. **610**

BC No. **14-5143**

R.s.100/=



وکالت نامہ

Sardar Amber Masood
Finance Secretary
District Bar Association
Abbottabad

Before The Service Tribunal UPK, Peshawar
Shumaila Rafiq vs Govt & others
(Service Appeal) **Appellant**
باعت تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات برائے پیشی یا تفسیر مقدمہ بمقام **Abbottabad** کے لیے

KALIMULLAH Adv High Court ATD

کو حسب ذیل شرائط پائل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ کیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس سے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پشہری کے علاوہ کسی جگہ یا پشہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل یا پشہری کے اوقات کے ذمہ دار نہ ہوں گے اور مقدمہ پشہری کے علاوہ کسی اور جگہ ساعت ہونے پر یا بروز تعطیل یا پشہری 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 مقادیر کے راجس کرنے سے صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کوکل ساختہ پرداختہ صاحب موصوف مشل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل مگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار پر وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر مٹائی و ریشی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ ذمے کا بھی اختیار ہوگا اور بصورت جانے پیر و نجات از پشہری صدر اپیل و برآمدگی مقدمہ یا مستحق ڈگری یا پشہری یا کسی قسم انتہائی یا ترقی یا اگر مٹائی اپیل از مگرانی و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ متن آنہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کر سکیں اور ایسے وکیل کو بھی ہر امر میں وہی اور ایسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری میں تاریخ پیشی سے پہلے آڈائن کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

2021/03/28

مورخہ: _____
سال _____ ماہ _____ دن _____

مضمون وکالت نامہ سن _____ ہے اور اچھو طرح سمجھ لیا ہے اور مٹھو ہے۔
وکالت نامہ کی فیکس کاپی قابل قبول نہ ہوگی

Shumaila Rafiq

ACCEPTED

"A"

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

No.

APPEAL No. 4516 of 20 21

Sprussila Rafiq

Appellant/Petitioner

Versus

Through Genl. Edm. de Pina Pish

RESPONDENT(S)

Amirul Karimullah

Notice to Appellant/Petitioner

*Advocate High Court
Peshawar*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-7-2021 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 Peshawar

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

"A"

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

No.

APPEAL No. 12516 of 20 21

Shamzida Rafiq

Appellant/Petitioner

Versus

Through Secy: Edn: MHC P. Sh:

RESPONDENT(S)

Notice to Appellant/Petitioner

Shamzida Rafiq, D/O
Muhammad Rafiq

Subjects Specialist (Biology) G/G HSS
Kangra Haripur

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-7-2021 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 Peshawar

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

"A"

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

No.

T.B

APPEAL No.....4516..... of 2021.

Shamaila Rafiq

Appellant/Petitioner

Versus

Through Secy. Educ. Dept. Pesh.

RESPONDENT(S)

Counsel
Notice to Appellant/Petitioner

Kalimullah
Advocate High Court
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 12-10-2021 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. Road

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

"A"

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

No.

713

APPEAL No.....14516..... of 2021.

Shamshad Rafiq

Appellant/Petitioner

Versus

Through Beg. Ehsan Ullah Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Habibullah Advocate
High Court
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-2-2022 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 Road

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

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

No.

T13

APPEAL No.....4576..... of 2021

Shumaila Rafiq

Appellant/Petitioner

Versus

Through Secy: Edu: U.P.K. Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Shumaila Rafiq, D/O M. Rafiq
Subjects Specialist Biology
BPS-17 GG HSS. Kangra
Hazirpur.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-2-2022 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 Peshawar

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