

20.01.2022

Appellant present through representative.

Lawyers are on general strike, therefore, case is adjourned. To come up for preliminary hearing on 19.04.2022 before S.B at Camp Court, Abbottabad.



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

19.04.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 15.06.2022 before S.B at Camp Court, Abbottabad.

Rs-400/-
Appellant Deposited
Security & Process Fee

A. Muhammad
26/4/22

15.06.2022


Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 16.08.2022 before S.B at Camp Court Abbottabad.



(Rozina Rehman)
Member (J)

Camp Court, A/Abad



(Fareeha Paul)
Member (E)

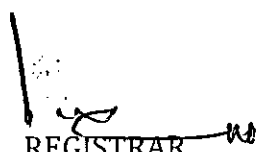

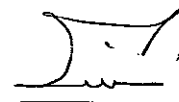
Camp Court A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7735 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	08/11/2021	<p>The appeal of Mst. Neelam Bibi resubmitted today by Mr. Fazal Haq 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>2-</p>	23.12.2021	<p>This case is entrusted to touring S. Bench at Abbottabad for preliminary hearing to be put up there on <u>23/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Nemo for the appellant.</p> <p>Notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing on 20.01.2022 before the S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> (Salah-Ud-Din) Member (J) Camp Court Abbottabad</p>

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

Case Title: Neelam Bibi vs Govt of KPK.

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

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

Name:

Fazal-Haari adv. H/c

Signature:



Dated:

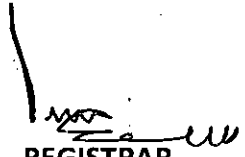
4/11/21

The appeal of Mst. Neelam Bibi Ex-PST GGPS Sazin Abad District Dassu Kohistan Upper received today i.e. on 21.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Check list is not attached with the appeal.
2. Annexures of the appeal may be attested.
3. Memorandum of appeal may be got signed by the appellant.

No. 2100 /S.T,

Dt. 21/10 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Haq Advocate
High Court at Mansehra.

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 7735 of 2021

Neelam Bibi... **Appellant**

VERSUS

Director Elementary and Secondary
Education Peshawar etc **Respondents**

APPEAL

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Dated 11.07.2020

NEELAM BIBI
(Appellant)

Through:-


FAZAL HAQ

Advocate High Court

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No ____ of 2021

Mst. Neelam Bibi, Ex-Primary School
Teacher at Government Girls Primary School
Sazin Abad, Tehsil Dassu, District Kohistan
upper.....**Appellant**

VERSUS

- 1) Director Elementary and secondary
Education Peshawar.
 - 2) District Education officer (Female)
Kohistan at Dassu.
-**Respondents**

APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL, ACT, 1974
AGAINST THE IMPUGNED ORDERS NO
1512-19 DATED 10.06.2021, PASSED
BY RESPONDENTS WHEREBY MAJOR
PENALTY OF REMOVAL FROM
SERVICE OF APPELLANT ON THE
GROUND OF ALLEGED UNSPECIFIED
ABSENCE FROM DUTY WAS IMPOSED
AND UPHELD.

PRAYER:-

On acceptance of the instant service appeal, the impugned orders bearing No **1512-19** dated **10.06.2021**, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

Respectfully Sheweth:-

1. That, appellant was appointed in a prescribed manner by competent authority against the post of Primary school Teacher vide appointment order No. 8631-39 dated **09.12.2006**.

(Copy of appointment order dated 09.12.2006 annexed as Annexure "A").

2. That, all of a sudden, respondent No 02 without citing any reason and intimation straightaway, with a single stroke of pen imposed Major penalty of removal from service upon appellant w.e.f. **10.06.2021** on the ground of alleged unspecified absence from duty, vide impugned order No. **1512-19** dated **10.06.2021**.

(copy of impugned order dated 10.06.2021 is annexed as Annexure "B").

3. That, appellant filed a Departmental appeal on dated **17.06.2021**, with respondent No 02, and rejection order was not received from the department..

(Copies of Departmental appeal dated **17.06.2021** is annexed as Annexure "C").

4. That, the appellant move an application for the respondent No. 02 to released his salary dated **07.06.2021** but unfortunately respondent No. 02 was not any response.

(copy of the application dated **07.06.2021** as annexed "D").

5. That, felling aggrieved from the impugned orders dated **10.06.2021** the appellant having no other remedy files the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

GRUNDS:-

- A) That, appellant never remained absent as alleged and the entire illegal

proceedings were carried out fictitiously, while sitting in office by respondent No 02 out of mala-fide.

- B) That, before imposing the impugned penalty, no publication as required **under rule 9 of E&D, Rules, 2011**, was ever made in the leading newspapers, commonly available in the District of the appellant. The reference of news papers publication in the impugned order are not commonly available in the area of the appellant, hence, the impugned order is wholly illegal, unlawful, without lawful authority and of having no legal effect.
- C) That, no show cause notice was ever issued and the entire proceedings were fictitiously conducted by respondent No 02 at the back of the appellant.
- D) That, no inquiry into the alleged allegations was ever conducted and the impugned penalty was imposed without having the allegations proved.
- E) That, appellant was never confronted with the alleged allegations at any point of time, condemning her unheard.
- F) That, before passing the impugned order, appellant was not put on notice

to present his view point/explanation under the Doctrine of **AUDI AULTEMI PARTEM**, hence, the impugned order is not sustainable and maintainable under the law on this very sole ground.

- G) That, no evidence worth name was attempted to collect by respondent No 02 against the appellant for alleged absence from duty and he has been condemned on flimsy and perverse grounds with mala-fide intention.
- H) That, appellant had a long unblemished service record at her credit and she has been removed from service with a single stroke of pen without observing due process of law and having the allegations proved.
- I) That, no complaint was ever filed by any one against the appellant for her being absent from duty as alleged on any working day with any authority.
- J) That, the impugned order on its very face value, is illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect.

PRAYER:-

On acceptance of the instant service appeal, the impugned orders bearing No **1512-19** dated **10.06.2021**, passed by

respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

Dated 18.10.2021

Mst Naleem Bibi
(Appellant)

Through:-


FAZAL HAQ
ADVOCATE HIGH COURT

VERIFICATION :

I, Mst. Neelam Bibi, ex-primary school teacher at government girls primary school sazin abad, tehsil dassu, district kohistan upper, do hereby solemnly affirm and declare that the contents of fore-going appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this honorable tribunal.

NEELAM BIBI
(DEPONENT)

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No ____ of 2021

Neelam Bibi... ..Appellant

VERSUS

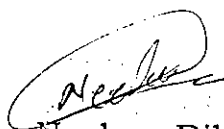
Director Elementary and Secondary
Education Peshawar etcRespondents

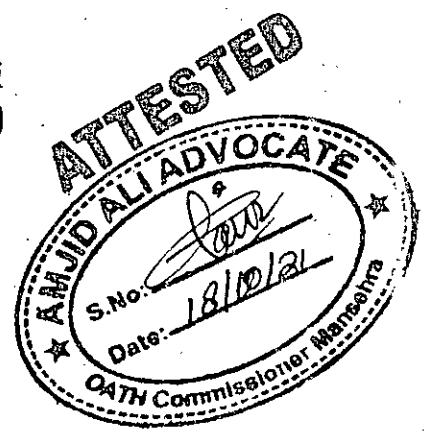
APPEAL

AFFIDAVIT

I, Mst. Neelam Bibi, Ex-Primary School Teacher at Government Girls Primary School Sazin Abad, Tehsil Dassu, District Kohistan upper, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. That the contents of fore-going affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

Dated: 18.10.2021


Neelam Bibi
(DEPONENT)



BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No _____ of 2021

Mst. Neelam Bibi,.....**Appellant**

VERSUS

Director Elementary and Secondary
Education Peshawar etc**Respondents**

APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Neelam Bibi, Ex-Primary School
Teacher at Government Girls Primary School
Sazin Abad, Tehsil Dassu, District Kohistan
upper

RESPONDENTS:

- 1) Director Elementary and secondary
Education Peshawar.
- 2) District Education officer (Female)
Kohistan at Dassu.

Dated 18.10.2021

Neelam bibi
(Appellant)

Through:-



FAZAL HAQ
Advocate High Court

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ANNEXURE
A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY
KORORI AT DASSU

APPOINTMENT ORDER

Consequent upon the approval of Department's Selection Committee the competent authority has been pleased to appoint the following (Female) Middle Passed Untrained candidates Fresh of Tehsil Dassu (Union Council wise) against the vacant Posts of PTC in BPS-04 (Rs.2345-100-5345) Fixed plus Usual Allowances as admissible under the rules on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

S.No	Name of candidate	Father's Name	Residence/ U/C	App: as	School where posted	Remarks
1	Lal pari	Said Amir	Dassu	PTC	GGPS Dassu Village	Agst V.Post
2	Gul Shan	Rafiq shah	Bar Jalkot	PTC	GGPS Koop	Agst V.Post
3	Umar Jan	Khaiyanoos	Bar Jalkot	PTC	GGPS Saddam Dadir	Agst V.Post
4	Gul Panarr Bibi	Abdul Hanan	Bar Jalkot	PTC	GGPS Eal Jalkot	Agst V.Post
5	Sergena Bibi	Abdul Hanan	Bar Jalkot	PTC	GGPS Eal Jalkot	Agst V.Post
6	Salma Bibi	Qalander Khan	Bar Jalkot	PTC	GGPS Khaloot	Agst V.Post
7	Bibi Hawa	Saif ullah	Jaffar Dader	PTC	GGPS Khaloot	Agst V.Post
8	Gul Naz Bibi	Bakhtiar	Bar Jalkot	PTC	GGPS Dadboon	Agst V.Post
9	Naseema	Nawah Khan	Bar Jalkot	PTC	GGPS Dadboon	Agst V.Post
10	Saira Marjan	M.Qadcer	Baryar	PTC	GGPS Barishaha	Agst V.Post
11	Shakila	M.Saeed	Baryar	PTC	GGPS Mamoki Ser	Agst V.Post
12	Gul Nargis	Sher Bhadar	Baryar	PTC	GGPS Mamoki Ser	Agst V.Post
13	Mahcena Bibi	Ghulam Haider	Baryar	PTC	GGPS Sheroi Baik	Agst V.Post
14	Salma Bibi	Son Main	Baryar	PTC	GGPS Jaakh	Agst V.Post
15	Nizakat Begum	Shah Zareen	Baryar	PTC	GGPS Jaakh	Agst V.Post
16	Bibi Fatima	Masta Khan	Baryar	PTC	GGPS Jamra Jalkot	Agst V.Post
17	Kul Soom	Sikandar Khan	Baryar	PTC	GGPS Jamra Jalkot	Agst V.Post
18	Farzana Bibi	Sher wali Khan	Baryar	PTC	GGPS Kuz Gahoon	Agst V.Post
19	Gul Badan	M.Miskeen	Baryar	PTC	GGPS Dhannat	Agst V.Post
20	Gul Badan	Gharib Shah	Kaigah	PTC	GGPS Dassu Village	Agst V.Post
21	Nargis	Mohamriad Ashraf	Dassu	PTC	GGPS Dassu Village	Agst V.Post
22	Yasmin Bibi	Hassan Shah	Dassu	PTC	GGPS Uchar Ser	Agst V.Post
23	Serwesa bibi	Ali Akbar	Dassu	PTC	GGPS Sheela Ratt	Agst V.Post
24	Hussan Pari	Hasham Khan	Teyal	PTC	GGPS Uchar Ser	Agst V.Post
25	Gul Naba	Janan Khan	Dassu	PTC	GGPS Dassu Colony	Agst V.Post
26	Gul Chaman	Sikandar Khan	Dassu	PTC	GGPS Dassu Colony	Agst V.Post
27	Gul Hamida	Janan Khan	Dassu	PTC	GGPS Shal Dar	Agst V.Post
28	Lugash	Mustaqeem	Teyal	PTC	GGPS Dassu Colony	Agst V.Post
29	Laiba	M.Jonan	Dassu	PTC	GGPS Shal Dar	Agst V.Post
30	Hussan Jan	Hasham Khan	Teyal	PTC	GGPS Dassu Colony	Agst V.Post
31	Hussan Bano	Shahalam	Dassu	PTC	GGPS Dassu Colony	Agst V.Post
32	Sumbal	Abdur Raouf	Dassu	PTC	GGPS Dassu Colony	Agst V.Post
33	Zeba Hamid	Abdul Hameed	Dassu	PTC	GGPS Dassu Village	Agst V.Post
34	Gul Parri	M.Sharif	Dassu	PTC	GGPS Dassu Village	Agst V.Post
35	Shazia	M.Miskeen	Dassu	PTC	GGPS Jalo Chortoo	Agst V.Post
36	Gul Safia	Mohammad Alani	Dassu	PTC	GGPS Mohd:Shaha Dadir	Agst V.Post
37	Bibi Nagina	Utali	Goshali	PTC	GGPS Mohd:Shaha Dadir	Agst V.Post
38	Rukhsana Bibi	AlamGir	Goshali	PTC	GGPS Samarabad	Agst V.Post
39	Bibi Rashida	Saif-ul Malook	Goshali	PTC	GGPS Bar Bak	Agst V.Post
40	Saira bano	M.Miskeen	Goshali	PTC	GGPS Dadir Goshali	Agst V.Post
41	Fareegh.Sibi	Saif Ul Malook	Goshali	PTC	GGPS Dadir Goshali	Agst V.Post
42	Gul taj	Jumshed	Goshali	PTC	GGPS Jahmra Dadir	Agst V.Post
43	Hanifa Bibi	Saif-ul Malook	Goshali	PTC	GGPS Jalo Chortoo	Agst V.Post
44	Bibi Hajia	Shamal Khan	Goshali	PTC	GGPS Jalo Chortoo	Agst V.Post
45	Aseema Bibi	Saif ur Rahman	Goshali	PTC	GGPS Bar Komila	Agst V.Post
46	Musrat	Said Nadir	Komila	PTC	GGPS Gakuz	Agst V.Post
47	Butshah Bibi	Sher Khan	Harban	PTC	GGPS Gakuz	Agst V.Post

Contd:P-02

P. 10

48	Gu. Iar	M. Faqeer	Harban	PTC	GGP	Gakuz	Agst V. Post
49	Bibi Miryam	M. Ibrahim	kuz Jalkot	PTC	GGP	Shakari	Agst V. Post
50	Lalaha Bibi	Shams ul Rahmaan	Dilbar Daxir	PTC	GGP	Jalo Chortoo	Agst V. Post
51	Khatoon Bibi	Harkat Khan	kuz Jalkot	PTC	GGP	Jalkot Village	Agst V. Post
52	Gu. Shad	Sher Mohammad	kuz Jalkot	PTC	GGP	Jalkot Village	Agst V. Post
53	Bejum Hakeem	Abdul Khan	Seo	PTC	GGP	Seo Village	Agst V. Post
54	Nama Bibi	Ser Baz Khan	Dassu	PTC	GGP	Jalo Chortoo	Agst V. Post
55	Nesam Bibi	Shales Khan	Sazin	PTC	GGP	Sultanabad	Agst V. Post
56	Sojia Akram	Mohammad Akram	Sazeen	PTC	GGP	Sultanabad	Agst V. Post

CONDITIONS:-

- 1 Their appointments are purely on temporary basis and liable to termination at any time / stage without assigning any reason/notice.
- 2 Their Certificates if not verified earlier, should be verified by the EDO (M) i.e. Mr. Abdur Rehman I/C By DO (F) S&L Kohistan before handing over their charge.
- 3 Charge reports should be submitted to all concerned.
- 4 No TVDA is allowed to any one.
- 5 They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belong.
- 6 In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
- 7 They should not be allowed to take over charge if their age is less than 18-years and above 35-years.
- 8 They should produce age and health certificate from EDO Health Kohistan before taking of charge.
- 9 They should not be handed over charge and their salaries should not be drawn by Drawing & Disbursing Officers concerned till verification of their Degrees/ Certificates e.t.c from the concerned Universities/ Boards/ Institutions by the concerned DHO's.

Executive District Officer
Schools & Literacy Kohistan

Endst: No. 2001-39 / AppUPTC's (M)UIC Wise Merit /2006 Dated Kohistan the 7/17/2006.

- 1 Copy of the above is forwarded to:-
- 2 Director Schools & Literacy NWFP Peshawar.
- 3 P/S to Minister of Education NWFP Peshawar.
- 4 P/S to Secretary Government of NWFP (S & L) Department Peshawar.
- 5 District Nazim Kohistan
- 6 District Coordination Officer Kohistan with reference your Notification No.10232-36 dated 20/11/2006 & 10407-10 dated 24/11/2006.
- 7 District Accounts Officer Kohistan.
- 8 District Officer Schools & Literacy Kohistan.
- 9 Deputy District Officer (F)S&L Kohistan.
- 9 Candidates concerned.

Executive District Officer
Schools & Literacy Kohistan

P. (11)

ANNEXURE B
Σ B?



OFFICE OF THE DISTRICT EDUCATION OFFICER (F) KOHISTAN (UPPER)

Email: deofamalekohistanupper@gmail.com

OFFICE ORDER/ REMOVAL FROM SERVICE

1. Whereas Mst. Neelam Middle Pass, was appointed as Grade 4 PST teacher at GGPS Sazin Abad In 2006 as stop gap arrangement for a period of three years.
2. Whereas the prescribed qualification for PST teacher at that time was matric with PTC.
3. Whereas she was directed to improve her qualification as per the requirement of basic criteria for PTC teacher according to the merit policy of the government in vogue, but she badly failed.
4. Whereas as per EMA Report she remained habitually and wilfully absent from her duty, during the visits of the concerned DCMA, without proper permission/intimation or leave.
5. Whereas she was directed time and again to perform her duty properly and do not waste the precious time of the students, but she badly failed to comply.
6. Whereas she has drawn her salary illegally during the absent period from her duty.
7. Whereas as per report of the SDEO/ASDEO concerned she doesn't perform her duty
8. Whereas a show cause notice was served upon her vide this office Endst: No. 1165-69, Dated: 28-4-2021.
9. Whereas she badly failed to submit reply to the show cause in her defense within stipulated period.
10. Whereas she badly failed to avail the chance of personal hearing.
11. Whereas having low qualification, she is unable to teach the existing syllabus to the students properly.
12. Whereas while going through the material on record and personal observations of the undersigned, all the charges/allegations levelled against her have been proved to the full satisfaction of the undersigned.

Therefore the undersigned being the competent authority, do hereby impose Major Penalty of Removal from Service, upon Mst. Neelam , Grade 4 PST teacher at GGPS Sazin Kohistan Upper under Rule 4(b) of E&D Rules 2011, with immediate effect, in the interest of public service.

(MUHAMMAD AMIN)
District Education Officer (F)
District Kohistan Upper.

End No. 1512-19

Dated: 10 /06/2021

Copy for information and necessary action forwarded to:

1. The PA to Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
2. The Deputy Commissioner Kohistan Upper.
3. The District Accounts Officer Kohistan Upper.
4. The PA to District Education Officer (F) Kohistan Upper.
5. The Deputy District Education Officer (F) Kohistan Upper.
6. The SDEO/DDO concerned with the direction to stop the pay of the concerned teacher and make necessary entries in her service book immediately.
7. The teacher concerned.
8. Copy to Master File for record.


District Education Officer (F)
District Kohistan Upper.

P(12)

دعہ

بخدمت جناب ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

عنوان: اپیل برخلاف آڈر ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) کوہستان اپرنمبر 19-1512 مورخہ 10.06.2021
جناب عالی! موجبات اپیل ذیل پیش ہیں۔

- (۱)۔ یہ کہ سالہ 09.12.2006 کو محکمہ ایجوکیشن میں بطور PST ٹیچر تعینات ہوئی۔ جس کے بعد تاحال سالہ اپنے فرائض منصبی بطریق احسن مختلف اسٹیشن پر سرانجام دیتی رہی ہے۔ (نقل تعیناتی آرڈر لف ہے)۔
 - (۲)۔ یہ کہ سالہ نے دوران سروس کبھی بھی اپنی ڈیوٹی سے کوئی کوتاہی، غفلت نہیں کی اور نہ ہی کبھی ڈیوٹی سے غیر حاضر رہی ہوں، سالہ کی سابقہ سروس ریکارڈ اس بات کا بین ثبوت ہے کہ سالہ ہمیشہ اپنی ڈیوٹی بطریق احسن سرانجام دیتی رہی ہے اور کبھی بھی ڈیوٹی سے غیر حاضر نہیں رہی۔
 - (۳)۔ یہ کہ سالہ گورنمنٹ پرائمری سکول سازین کوہستان پر کے بالکل مابق رہائش پذیر ہے اور کبھی بھی ڈیوٹی سے غیر حاضر نہیں رہی۔
 - (۴)۔ یہ کہ سالہ کو کبھی بھی محکمہ جناب سے غیر حاضری نسبت کوئی شوکار نوٹس موصول نہیں ہوا اور نہ کبھی سالہ کی کوئی انکوائری ہوئی۔ حالانکہ تحت قانون سالہ کو Personal hearing کا موقع فراہم کیا جانا ضروری تھا۔
 - (۵)۔ یہ کہ مذکورہ آڈر غلط، خلاف قانون، خلاف واقع ہے۔ جو کہ قابل منسوخ ہے۔ (نقل آرڈر لف ہے)۔
 - (۶)۔ یہ کہ مذکورہ آڈر محض سالہ سے رنجش کی بنیاد پر جاری کیا گیا ہے۔ سالہ کے خلاف کوئی بھی شکایت نہیں ہے۔ علاقہ کے لوگ اس بابت گواہی دے سکتے ہیں کہ سالہ اپنی ڈیوٹی سرانجام دیتی رہی ہے۔
 - (۷)۔ یہ کہ تحت قانون آڈر جاری ہونے سے قبل انکوائری آفیسر کی تعیناتی کی جاتی ہے لیکن سالہ کو یک۔ جنبش قلم بغیر انکوائری آفیسر کے تقرری کے ملازمت سے بغیر کسی وجہ کے فارغ کر دیا گیا ہے جو کہ سالہ کے سراسر زیادتی اور ظلم ہے۔
 - (۸)۔ یہ کہ سالہ ایک غریب گھرانے سے تعلق رکھتی ہے اور مذکورہ نوکری ہی سالہ کا واحد ذریعہ معاش ہے۔
- لہذا استدعا ہے کہ نمبر آڈر 19-1512 مورخہ 10.06.2021 کو منسوخ فرمایا جا کر سالہ کو سابقہ مراعات کے ساتھ بحال کیا جائے۔

المرقوم 17 جون 2021ء

نیلیم بی بی سابقہ PST ٹیچر، GGPS سازین کوہستان پر نسیم بی بی سالہ

P (13)

1111

For Insurance Notices see reverse
Stamps

Rs. Ps.

10

RGL57556911

68/-

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

a registered*
to

Date-Stamp

Rec (in figures) (in words)
with the word "insured" before it when necessary.

insurance fee Rs. Ps. (in words)

Weight 9 Kilo

Grams

Name and
address
of sender

17/6/02

بخدمت جناب ڈسٹرکٹ ایجوکیشن افسر فی میل صلح ایم کو عثمان

عربی عالی! در فراست عراد salary ریلینز فرمائے جائے

جناب عالی! در فراست ذیل لکھنا ہے۔
1۔ ایم سائلہ گورنمنٹ پم اپری سکول سازین میں اپنی ڈیوٹی سر انجام دے رہا ہے۔

2۔ ایم سائلہ کا تنخواہ کی معینوں سے stop ہے اور سائلہ کو کوئی کوئٹس یا پم سٹاپ Hearing لکھنے آفس کی طرف سکول نہیں ہوا ہے۔ اگر کیونکہ اور اس وجہ سے سائلہ کا تنخواہ بند ہے۔

3۔ ایم سائلہ کبھی بھی اپنی ڈیوٹی میں کوتاہی یا غفلت اپنی کی ہے اور نہ ہی کبھی غائبی کی ہے۔ کیونکہ سائلہ کا گھر کبھی بالکل سکول کے ساتھ واقع ہے۔

4۔ ایم سائلہ کی معینوں سے آفس کا حکم کھٹا رہا ہے لیکن آفس کے حکم سے سائلہ کے ساتھ رجسٹر وہاں سے کھام کیا ہے۔ کبھی تھپتھپ میں آئی ہے salary علی کی اور کبھی کوئی اور بیان بنا کر مثال سکول سے کھام لیتے ہیں۔

5۔ ایم سائلہ اٹا غریب گورنمنٹ سے تعلق رکھتا ہے اور سائلہ کے کھام تم اخراجات سائلہ کی توڑی ہم department ہے اور ایلوے کھانے کی اور ضروری کھو چکنے کی ہیں ہے۔

لہذا اس سائلہ کا صلح سائلہ کی تنخواہ ریلینز فرمایا جاوے

تسلیم بی بی - تسلیم بی بی - سائلہ



BOARD OF INTERMEDIATE & SECONDARY EDUCATION
ABBOTTABAD

Khyber Pakhtunkhwa (Pakistan)
Secondary School Certificate Examination



PROVISIONAL & DETAILED MARKS CERTIFICATE

Roll No: 171804

Group: SCIENCE

(CLASS X)

Session (Annual) 2020

Name: NEELAM BIBI
Father's Name: HARIS KHAN
Date of Birth: 01-04-1998
Reg: No: 18040319001
Institution / District: KARAKORUM PUBLIC HIGH SCHOOL SHATIAL KOHISTAN

has secured the marks shown against each subject in the Secondary School Certificate Examination (Class 10th) Annual 2020 as a Regular Candidate.

Subjects	Total	9TH		10TH		Total	Marks in Words
		Marks Obtained		Marks Obtained			
		Th	Pract	Th	Pract		
English	150	44	--	As per Part I	88	Eighty-Eight	
Urdu	150	47	--	As per Part I	94	Ninety-Four	
Mathematics	150	25	--	As per Part I	50	Fifty Only	
Physics	150	43	10	As per Part I	106	One Hundred Six	
Chemistry	150	35	10	As per Part I	90	Ninety Only	
Biology	150	28	10	As per Part I	76	Seventy-Six	
Islamiat Comp	100	17	--	As per Part I	34	Thirty-Four	
Pakistan Studies	100	30	--	As per Part I	60	Sixty Only	
Total: 1100						598-C	Five Hundred Ninety-Eight Only

Dated: 22 July, 2020

Checked By: _____

Controller of Examination

Note: The Marks awarded for the 10th Class is the best prediction of the performance and has been awarded based on the fourth and guidelines approved by the government and recognized by IBCC due to Covid 19

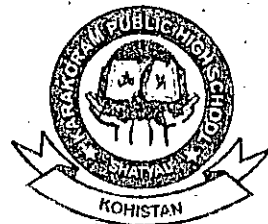
Serial No. 27

Reg: No. KS-5

KARAKORAM PUBLIC HIGH SCHOOL

SHATYAL KOHISTAN

Affiliated with B.I.S.E Abbottabad



CHARACTER CERTIFICATE

It is to Certify that Mr./Miss NEELAM BIBI

S/O, D/O SHARIS KHAN

R/O SAZIN DASSU KOHISTAN

was a regular student of this Institution from 2018 to 2020

During his stay in the school his/her conduct remained Good

Date 9/9/2020

PRINCIPAL
Karakoram Public High
School Shatyal Kohistan

PRINCIPAL

P-17

M. W. P. Med. No. 4

GS&PD-NWFP-2639 FS. 1,000 Pt of 100-15-2-87-(636)

MEDICAL CERTIFICATE.

Name of Official.....MISS. NEELAM BIBI.....
 Caste or race.....
 Father's name.....SHAHES. KHAN.....
 Residence.....VELEGE. SAKREN. TENY. L. DASSU.....
DISTRICT. KOLLISTAN.....
 Date of birth.....10-04-(1983).....
 Exact height by measurement.....
 Personal mark of identification.....
 Signature of the Official NEELAM BIBI.....
 Signature of head of office.....

Seal of Office.....

I do hereby certify that I have examined Mr. NEELAM BIBI a candidate for employment in the office of the.....E.D.O. S.S.L. KH..... and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except.....

I do not consider this as disqualification for employment in the office of the..... His age according to his own statement, twenty three years and by appearance about, twenty three years.

NIC 13401-8482976-8

Accepted
 Head Master
 Govt. Middle School
 Razin Distt. Kohistan

LEFT HAND THUMB AND FINGER IMPRESSIONS



Medical Officer
 Civil Hospital
 Kohistan

P 78

DOMICILE CERTIFICATE

(NORTH WEST FRONTIER PROVINCE)

I declare that I was born of parents who are permanently
Domiciled in N. W. F. P. having belonged to it by birth/ settled

[Signature]
31/7
Deputy District
Office Revenue & Estate
DASSU.

I belonged by birth to village/ Mohallah SAZEEN UIC SAZEEN.

Tehsil DASSU District KOHISTAN

[Signature]
Signature of Applicant
Dated 8/5/2004

Pursuance to the declaration Dated 8/5/2004 Filed by

NILAM BIBI Son/ daughter of SHARAI KHAN

Hereby certified that the said NILAM BIBI is born of parents who are
Permanent residents of the N. W. F. P. having belong to it by birth/ settled in it.

I have satisfied myself from personal/ my knowledge verification that the
above declaration is true and certify.

This 584 day of 8.5 2004

NO 1695 DATED 31/7/04
COUNTERSIGNED

[Signature]
DISTRICT OFFICER
Revenue & Estate
Kohistan.

[Signature]
31/7
DEPT. DISTRICT OFFICER
REVENUE & ESTATE
KOHISTAN
Deputy District
Office Revenue & Estate
DASSU.

[Signature]
Head Master
Govt. Middle School
Kohistan

ابا اذلا صلح بیان کراہہ نیلیم بی بی دستر شریس خان زوجہ احمد بی قوم شین
 سکندھ سائین تحصیل داسو ۱/۲ سائین تحصیل داسو ضلع کوستان
 کی مستقل باشندہ ہے۔ مسوۃ کا شوہر دیہہ لڈا میں صاحب جائیداد
 ہے۔ اس کو ڈویسائل سرٹیفیکٹ دیا جانا درست ہے۔

شیر خان
 Sheo Charab
 GENERAL COUNCILLOR,
 UIC Sarhi Kohistan

Raja M. Muhammad Arif
 UIC CO-ORDINATOR
 KHEIBER
 (26-85-00-2118)

NIC NO, 126-75015521

NIC NO,

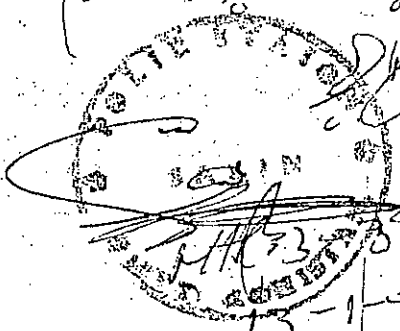
صنایع کا

صنایع کا حقیقی تاجر ہے۔ رجسٹرڈ تاجر ہے۔
 SHO نام سے زمین کرائی۔ لڈا میں زمیندار ہے۔
 نیلیم بی بی دستر شریس خان قوم شین سائین
 تحصیل داسو ضلع کوستان کی صاحبزادی ہیں۔
 مسوۃ کا شوہر دیہہ لڈا میں صاحب جائیداد
 ہے۔ اس کو ڈویسائل سرٹیفیکٹ دیا جانا درست ہے۔
 رجسٹرڈ تاجر ہے۔

31/7
 HONORABLE MEMBER
 P. Khilatan

15/10/14

صنایع نیلیم بی بی جوڑ احمد بی وکٹر شریس قوم شین
 کی معافی کوڈ لڈا کوڈ کے تحت ہے۔



Head Master
 Govt. Middle School
 Sarhi Kohistan

Copy

P (19)

حکومت پاکستان

قومی شناختی کارڈ

13401-8482976-8



نام: سلیم بی بی

جنس: عورت

توہمہ کا نام: احمد علی

شناختی علاقہ: لاہور

تاریخ پیدائش: 25/01/1978

عثمان ایوسف مبین



13401-8482976-8

لاہور، پاکستان

قومی شناختی کارڈ نمبر: 13401-8482976-8

ناتوان نمبر: TY5J6Y

لاہور، پاکستان

مسکول ہندو ایٹا

تاریخ اجراء: 05/10/2020

تاریخ منسوخ: 05/10/2030

گمشدہ کارڈ پر قریبی لیٹر نمبر میں ڈال دیں



DBAM No.

545

BC No.

15-6-194

Name of Advocate

فضل حق خان

S.No

3423

Fee Rs. 100/-



2020-21

General Secretary
District Bar Association
Mansherwah

وکالت نامہ

بعد الکی؟ کپ؟ سرورسٹر جنرل کپک لیسٹاور
 عنوان: صلح کیلئے
 منجانب: انیسٹریٹ ٹریبیونل مقدمہ: سرورسٹر جنرل

بابت خریدی آگاہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے بیرونی ذمہ دارانہ کام..... لیسٹا برائے کے لئے

فضل الحق انیسٹریٹ بائیکاٹ کورٹ صلح کیلئے

کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہونا ہوں گا اور بوقت پکارے جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست بیان حاشی و تصدیق کرنے اور اپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد نائشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتبعائی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف کو بشرط ادا سنگی علیحدہ مختار ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدورال مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی حالت میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداختہ وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

موزہ 17 اکتوبر 2021ء

Attested
ACCEPTED

مظہر
17/10/21

"A"

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

No.

TB A. Abt

APPEAL No. 735 of 2021

Neelam Bibi

Appellant/Petitioner

Versus

Director Elementary & Secondary Education etc

RESPONDENT(S)

Notice to Appellant/Petitioner

Counsel Faraz Haq

Advocate High Court

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 20-1-22 at 08:00 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
F. Abt
Abbotabad

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No. Reed

TR AIAbad

Appeal No. 7735 of 20 21

Mst Neelum Bibi Appellant/Petitioner

Versus

Director (CESSE) Pesh Respondent

Respondent No. 2

Notice to: District Education officer (E)
Kohistan at DASSU

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 15-6-22 at 8.00 A.M. If you wish to urge anything against the appellants/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 23.....

Day of.....5 20 22

at camp court

AIAbad.

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. Reed

TB AIAbad

Appeal No. 7735 of 20 21

Mst Neelum Bibi Appellant/Petitioner
Versus

Director (ESSE) Pesh. Respondent
Respondent No. 2

Notice to: —

District Education officer (E)
Kohistan at DASSU

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.

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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 23.....

day of.....20 22

at camp court

AIAbad.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.