

20th Sept 2022 None for the appellant present. Mr. Kabiruallah Khattak, Addl: AG alongwith Mr. Shuja, ADEO for respondents present.

Written reply on behalf of respondents submitted which is placed on file. To come up for arguments on 15.11.2022 before D.B at camp court Abbottabad.



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

HP LaserJet M402dn

Job Storage

Job Storage Description

Job Storage allows you to send the print job to the printer and have it stored there until you print it from the printer's control panel. Some Job Storage jobs allow an optional PIN to be associated with the job for extra security.

Job Storage USB Installation

To enable Job Storage, you must first insert a dedicated USB storage device (with at least 16GB of memory) in the rear USB slot. This USB storage device will hold the Job Storage jobs sent to the printer. If this USB storage device is removed, Job Storage will be disabled on the printer.

Insert the USB drive in the rear USB slot and follow the instructions on the control panel. This USB drive will be dedicated to Job Storage. The front USB slot will not work for Job Storage.

1. The USB cover may need to be removed to reveal the USB slot on some printer models. If there is a cover, remove it.
2. Insert a USB drive with at least 16GB of memory.
3. Follow the Control Panel messages to format the USB drive for Job Storage.

You may need to update your printer driver if you do not find the "Job Storage" tab after enabling the feature in the printer. Go to the following URL for instructions on how to update the printer driver.

<http://www.hp.com/support/jobstorage>

20.12.2021

Mr. Hamayun Khan, Advocate, for the appellant present and submitted Wakalat Nama on behalf of the appellant, which is placed on file. Preliminary arguments heard.

Appellant Deposited Security & Process Fee

Points raised need consideration, therefore, the appeal in hand is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the

Appellant Deposited Security & Process Fee

respondents for submission of written reply/comments on 15.02.2022 before the S.B at Camp Court Abbottabad.

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

15-2-22

15.02.22

Due to retirement of worthy chairman case is adjourned. To come up for the same on 19-7-22.

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hasse

19.07.2022

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General present.

Previous date was changed on Reader Note, therefore, notices be issued to the respondents through registered post and to come up for submission of written reply/comments on 20.09.2022 before the S.B at Camp Court Abbottabad.

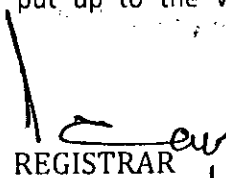


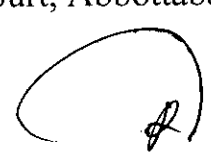
(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 6490 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/12/2020	<p>The appeal of Mst. Naheed Anwar received today by registered post may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19-5-2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
19.05.2021		<p>Due to cancellation of tour, Bench is not available. Therefore, case is adjourned to 27.09.2021 for the same as before.</p> <p style="text-align: right;"> Reader</p>
27.09.2021		<p>Nemo for appellant.</p> <p>Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 20.12.2021 for hearing before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> (Rozina Rehman) Member Camp Court, A/Abad</p>

BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL

CAMP COURT ABBOTTABAD

Service Appeal No: 16420 of 2020

Mst. Naheed Anwar daughter of Anwar Baig Abbasi, Senior Qaria, Govt Girls Higher Secondary School, Lora, Tehsil Lora, District, Abbottabad.

....APPELLANT

VERSUS

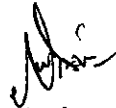
1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar.
2. Director of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Elementary & Secondary Education) (Female), Abbottabad.

....RESPONDENTS

SERVICE APPEAL
INDEX

S. No	DESCREPTION OF DOCUMENTS	ANNEXURE	PAGE NO
1	Memo: of Service Appeal alongwith Affidavit	—	1-4
2	Copy of First appointment order dated 17/01/1998 of the appellant.	A	5-6
3	Copies of Academic and Professional certificates of the appellant.	B	7-13
4	Copy of Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012 by respondent No.1.	C	14-15
5	Copy of appointment order of the junior Qarias / teachers.	D	16-19
6	Copy of promotion order dated 08/02/2018 of the appellant by respondent No.3.	E	20
7	Copy of departmental appeal of the appellant dated 08/09/2020 before respondent No.2	F	21-22

Dated ___/12/2020


(Naheed Anwar)
(appellant in person)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

CAMP COURT ABBOTTABAD

Service Appeal No: _____ of 2020

Mst. Naheed Anwar daughter of Anwar Baig Abbasi, Senior Qaria, Govt Girls Higher Secondary School, Lora, Tehsil Lora, District, Abbottabad.

....APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar.
2. Director of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Elementary & Secondary Education) (Female), Abbottabad.

....RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST IMPUGNED PROMOTION NOTIFICATIONS /ORDERS FROM QARIA to S.QARIA (BPS-15) ISSUED BY RESPONDENT NO.3 IN WHICH THE APPELLANT WAS ILLEGALLY IGNORED FROM PROMOTION OF QARIA TO S.QARIA POST, THE SAID ORDERS ARE TOTALLY AGAINST THE LAW, WITHOUT JURISDICTION MALAFIDY AND ISSUED ON BASELESS FACTS AND APPELLANT FILED A DEPARTMENTAL APPEAL BEFORE RESPONDENT NO.2 ON 08/09/2020 WHICH WAS NOT HONORED HENCE, THE APPELLANT IS FILING THE INSTANT SERVICE APPEAL BEFORE THIS HON'BLE TRIBUNAL WITHIN THE SPECIFIC PERIOD OF 120 DAYS.

PRAYER:

ON ACCEPTANCE OF THE INSTANT APPEAL, IT IS VERY HUMBLY PRAYED THAT, IMPUGNED NOTIFICATIONS/ORDERS, MAY KINDLY BE SET ASIDE / MODIFIED AND THE APPELLANT MAY GRACIOUSLY BE PROMOTED W.E.F. 15/12/2015 AT WHICH THE MOST JUNIOR TEACHERS FROM THE APPELLANT (QARIA) WERE PROMOTED TO S.QARAI POST, WITH ALL BACK BENEFITS.

=====

Respectfully Sheweth,

FACTS

- 1) That, appellant was appointed as a "Qaria" in BPS-07, at GGHS Bakote, District Abbottabad on 17/01/1998 vide order Endst: No. 301-11 and appellant took over charge on 01/03/1998. (Copy of First appointment order dated 17/01/1998 is attached as Annexure "A")
- 2) That, the appellant was promoted from BPS-07 to BPS-09 on 01/07/2005 at the basis of passing Intermediate Exam in 2nd Division in the light of the notification dated 13/08/2005 issued by Govt of KPK Finance Department Peshawar.
- 3) That, the appellant's professional and Academic qualification is as under:-

S.No.	Certificate/Degree	Passing year	Obtained marks	Board / University.
1.	S.S.C	1992	548/850	BISE, Abbottabad.
2.	H.S.S.C	2000	547/1100	BISE, Abbottabad.
3.	B.A	2004	563/1000	AIOU, Islamabad.
4.	M.A (Islamiyat)	2012	585/900	Hazara University.
5.	B.Ed	2013	689/1100	AIOU, Islamabad,
6.	Shahadat-ut-Tajweed	2015	435/600	Madrasa Dar-ul-Qura, Peshawar.

(Copies of relevant documents are attached as Annexure "B")

- 4) That, as the basic scale of the post of Qaria was upgraded into BPS-12 vide Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012, issued by Respondent No.1 hence, the appellant was also promoted/upgraded from BPS-09 to BPS-12 w.e.f 01/07/2012 in the light of abovementioned notification. Moreover, it was also mentioned in the said notification that 1/3rd Qarias of the total Qarias post, shall be promoted into BPS-15 at the basis of Seniority cum fitness and prescribed qualification. (Copy of Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012, is attached as Annexure "C")
- 5) That, on 03/12/2015, Appellant passed course of "Shahadat-At-Tajweed-ul-Quran AL-Kareem" from recognized Institute as per the requirement of Department. (Copies of Sanad and DMC are already attached as Annexure "B")

- 159
3
2006
- 6) That, the vide the impugned orders, following most junior Qarias/teachers were promoted to S.Qaria post but the appellant was badly ignored with malafide practice.

7)

S.No.	Name	D/o appointment	D/o Promotion to S/Qaria	Name of School
1.	Farzana Farooq	01.05.1999	15.12.2015	GGHS Mirpur, ATD
2.	Uzma Rasheed	04.06.2009	15.12.2015	GGHS, Bandi Maira, ATD
3.	Marrim Bibi	04.06.2009	15.12.2015	GGHS, Ghumawan, ATD
4.	Maria Malik	04.06.2009	15.12.2015	GGHS, B. Dhundan, ATD
5.	Habib-un-Nisa	04.06.2009	15.12.2015	GGHS, Kuthwal, ATD
6.	Saira Parveen	05.06.2009	15.12.2015	GGHS, Sultanpur, ATD
7.	Syed Sadaf Sultan	05.06.2009	15.12.2015	GGHS, Kuthiala, ATD
8.	Sajida Bibi	05.06.2009	15.12.2015	GGHSS, Malikpura, ATD
9.	Balques Bibi	12.06.2009	15.12.2015	GGHSS, Havelian, ATD
10.	Sabeela Bibi	18.01.2005	07.01.2016	GGHS, Berote, ATD
11.	Shagufta Parveen	04.06.2009	07.01.2016	GGHSS, Hajia Gali, ATD

(Copies of the appointment orders of the above said teachers are attached as Annexure "D")

- 8) That, later on in the light of Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012, issued by Respondent No.1, appellant was promoted from Qaria to S/Qaria post on 08/02/2018 vide Endst: No. 1033-37 issued by Respondent No.3 and, at the present, appellant is working as S/Qaria at GGHS, Lora, Tehsil Lora District, Abbottabad in BPS-15. (Copy of promotion order dated 08/02/2018, is attached as Annexure "E")
- 9) That, on 08/09/2020, appellant filed departmental appeal before respondent No.2 against the illegal impugned promotion orders issued by respondent No.3 but the same is still pending. (Copy of departmental appeal is attached as Annexure "F")
- 10) That, the appellant assails the impugned promotion notifications on the following amongst other grounds:-

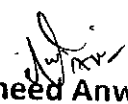
GROUND:

- That, the seniority of any employee is to be considered from the date of first appointment of the employee according to the Rules, Law and Policy.
- That, according to the Judgment of August Supreme Court of Pakistan (2001 PLC (C.S) 1228) any permanent basis appointed employee, could never become underside from his junior in seniority.
- That, the impugned Notifications/orders were issued only at the basis of malafide intention in which law and Rules were not followed.

- 4
- d. That, due to the impugned notification/orders, the service career of the appellant is being suffered badly alongwith financial loss.
 - e. That, the appellant fulfills all the codal formalities for promotion into S/Qaria post because the appellant have a prescribed qualification alongwith seniority cum fitness.
 - f. That, the appellant fulfills the requirement of prescribed qualification but inspite of that, the appellant was differed from promotion only to mentally torture the appellant.
 - g. That, there is no such kind of order was issued against the appellant under section-4 of the E&D Rules 2011, by the competent or Hire authority due to which the promotion of appellant was liable to be stopped.
 - h. That, respondents ignored the appellant from promotion which is not in the jurisdiction of respondents thus, respondents exceeded their power and intentionally ignored the appellant from promotion only to mentally torture the appellant.
 - i. That, the instant appeal is well within time.
 - j. That, the other point shall be raised at the time of argument with the prior permission of Hon'ble Tribunal.

It is therefore, respectfully prayed that the instant appeal may graciously be accepted, and the appellant may kindly be promoted w.e.f. 15/12/2015 at which the most junior teachers (Qarias) from the appellant, were promoted to S.Qaria post, with all back benefits. Any other relief for which the appellant is entitled and same is not asked/prayed specifically, may kindly be granted in the favour of the Appellant too.

Dated ___/12/2020


(Naheed Anwar)
(Appellant Inperson)

AFFIDAVIT:

I, Mst. Naheed Anwar daughter of Anwar Baig Abbasi, Senior Qaria, Govt Girls Higher Secondary School, Lora, Tehsil Lora, District, Abbottabad. CNIC No.13101-2470852-6, the **Appellant**, do hereby affirm on oath that contents of instant appeal are correct and true to the best of my knowledge and belief and nothing has been suppressed from this Honourable Tribunal and instant appeal is first appeal and same nature of any other appeal is not pending before this Honourable Tribunal.

Dated ___/12/2020


DEPONENT

5

ANNEXURE

A

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SECONDARY
HARRIPUR/ ABBOTTABAD.

NOTIFICATION

Consequent upon their Selection, by the Departmental Selection Committee, the District Education Officer (Female) Secondary Haripur/ Abbottabad, has been pleased to appoint the following mentioned Teachers at the schools noted against each, with immediate effect or from the date of re-opening of the schools after winter vacation as the case may be in the interest of public service in H.P.E. No.7 (1480-84-3088) and in case of FA/F.Sc IIInd Division H.P.E. No.9 (1605-97-3060) plus usual allowances as admissible under the rules, subject to the existing terms and conditions:-

S.No.	Name and Designation	Date of Birth	No. of Merit	Name of Schools	Remarks
1.	Azra Qazi D/O Qazi Khurshid Ahmad D/O Qazi	12-7-75	1/25	GOVERN A/Abad.	Against Vacant Post
2.	Mahid Anwar D/O Anwar Beg D/O Ghazwan(Lana).	12-3-75	2/01	GOVERN Babota.	Against Vacant Post. Created Post.
3.	Faqeer Bibi D/O Abdul Muzaffar D/O Jahriya.	07-12-75	3/08	GOVERN Mirpur.
4.	Lahia Shabana D/O Abdul Jabbar D/O Phalleh.	01-06-74	4/04	GOVERN Babota.	Against Vacant Post.
5.	Shabana Bibi D/O Shabana Khatun D/O Sayyid Abbas.	25-05-75	5/21	GOVERN Pindi Karga Khan.	Against Vacant Post. Created Post.
6.	Suzanne Iqbal D/O Abdul Jalil D/O Khalid Hussain.	15-03-74	6/10	GOVERN Rich Khan.	Against Vacant Post.

TERMS AND CONDITIONS.

- They should be Governed by such rules and regulation as may be prescribed by the Govt. from time to time for the category of Govt. servants to which they belong.
- Their services will be liable to termination on one month notice from either sides in case of resignation without notice one month pay will be forfeited in lieu of thereof.
- They should join the posts within one month of the re-opening of the schools after winter vacation.
- Their inter seniority will be determined in accordance with the merit list of Departmental Selection Committee.
- Charge reports should be submitted in duplicate.
- They should be on probation for a period of two years.
- Their original certificates should be verified from the concerned University, BIS and Islamic Madaris concerned before handing over charge.
- Service Books of the teachers must be prepared/completed in all respect before handing over charge.
- The declaration of Assets should be obtained from them immediately and placed on record.
- They are required to produce medical and health certificate from authority concerned before handing over charge.

-PTO-

ANNEXED
B/-

- 11. Charge should not be given to average candidates, her case for promotion sent to the quarters concerned.
- 12. Efforts for transfer before the completion of tenure will disqualify her from the service.
- 13. L.T./D.L. is allowed.
- 14. An undertaking shall be obtained from Master and Deared holder that they will serve the Department for at least five years.

DISTRICT EDUCATION OFFICER (FEMALE)
 DISTRICT HARIPUR & ABBOTTABAD.

Serial No. 3937/A-14/APPPT dated A'Abad the 17-1-98

Copy of the above is forwarded for information & necessary action to the :-

- 1. Director Secondary Education NWFP, Peshawar with reference to his office No. 3934/A-14/APPTT. O. File; and No. 3937/A-14/APPPT:A. File date 31.12.1997.
 - 2. District Accounts Officer Haripur/Abbottabad.
- ~~Principal, Haripur/Abbottabad.~~
~~Principal, Haripur/Abbottabad.~~
~~Principal, Haripur/Abbottabad.~~
- 3. Official copy.
 - 4. Office order file.
 - 5. D.S.G. (A) Local office.

DISTRICT EDUCATION OFFICER (FEMALE)
 DISTRICT HARIPUR & ABBOTTABAD.

[Handwritten signature]

ADA No 015632

Roll No. 713

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Abbottabad N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION ANNUAL 1992

THIS IS TO CERTIFY THAT NAHEED ANWAR

Son/Daughter of ANWAR BATIG ABBASI

and a student of GOVT: GIRLS HIGH SCHOOL LORA ABBOTTABAD,

has passed the Secondary School Certificate Examination

of the Board of Intermediate and Secondary Education, Abbottabad held in March 1992

as a *Regular/Private candidate*. He/She obtained 548 Marks out of 850

and has been placed in Grade B Representing VERY GOOD

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|------------|--------------|
| 1. English | 3. Islamiyat | 5. PHYSICS | 7. CHEMISTRY |
| 2. Urdu | 4. Pakistan Studies | 6. BIOLOGY | 8. MATHS (E) |

He/She has been awarded Grade C on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is SECOND MARCH,
one thousand nine hundred and SEVENTY FIVE, (02-03-1975)

Asst. Secretary

This certificate is issued without alteration of erasure.

Secretary

REGISTERED

[Handwritten signature]

ADAN# 019990

3

Roll No. 22116

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



**Abbottabad N.W.F.P. - Pakistan
INTERMEDIATE EXAMINATION CERTIFICATE
HUMANITIES Group
SESSION ANNUAL 2000**

This is to certify that NAHEED ANWAR

Son/Daughter of ANWAR BAIG

A candidate from ABBOTTABAD

Registered No. 1518-AB/P-99 has passed the Intermediate Examination of the

Board of Intermediate and Secondary Education, Abbottabad held in May 2000 as a

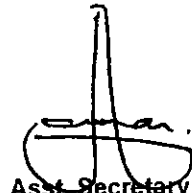
Regular / Private Candidate. He/She obtained 547 marks out of 1100

and has been placed in Grade D Representing FAIR

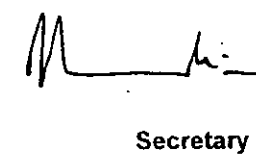
The Examination was taken as a whole/in parts and the candidate passed in the following


subjects.

- | | | |
|------------|---|--------------------|
| 1. English | 3. Islamic Education - Pakistan Studies | 5. ISLAMIC STUDIES |
| 2. Urdu | 4. ARABIC | 6. ISLAMIC HISTORY |


Asst. Secretary

This certificate is issued without alteration or erasure


Secretary

RECEIVED


(9)

Allama Iqbal Open University Islamabad



Serial No. 58110

Certified that Mr. / Ms. NAHEED ANWAR

Son / Daughter of ANWAR BAIG ABBASI


Registration No: 00-NAD-1053 Roll No: J-4765274

having completed the prescribed requirements in semester
AUTUMN, 2003

is awarded the degree of:

Bachelor of Arts

He/She has secured 58 % marks and has been placed in C grade.


CONTROLLER OF EXAMINATIONS

Result declared on: September 16, 2004




VICE-CHANCELLOR

ISLAMABAD, DATED: April 25, 2005

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY



(10)

Allama Iqbal Open University Islamabad



Serial No. 279851

Certified that Mr. / Ms. **NAHEED ANWAR**

Son / Daughter of **ANWAR BAIG ABBASI**

Registration No: **00NAD1053**

Roll No: **AE648200**

having successfully completed the prescribed requirements

in semester **AUTUMN 2012** is awarded the degree of

Bachelor of Education (B.Ed)

He / She has secured **65** % marks and has been placed in **B** grade.

Maw

CONTROLLER OF EXAMINATIONS



VICE-CHANCELLOR

Result declared on: **July 08, 2013**

Date of issue: **February 01, 2018**

NOTE: THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT/PROVISIONAL CERTIFICATE ISSUED SEPARATELY

AS



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2012

Roll No: 51242

Reg No: 11-PA-2218

Name: Naheed Anwar

F/ Name: Anwar Baig Abbasi

Institution: ABBOTTABAD

Subject: Islamiyat

District:

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				331	THREE HUNDRED THIRTY-ONE	
(Al-Qura'an) Translation 2nd Half & Commentary alongwith Grammar	100		77		77	SEVENTY-SEVEN	Pass
Principles of Islamic Jurisprudence	100		51		51	FIFTY-ONE	Pass
Islam & other World Religions	100		66		66	SIXTY-SIX	Pass
Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100		57		57	FIFTY-SEVEN	Pass
Islamic Economics / Islamic Politics / Islam & Science	100		55		55	FIFTY-FIVE	Pass
General Viva Voce	100		52		52	FIFTY-TWO	Pass
Total: 1100 Percentage: 62.64 Division: FIRST					689	SIX HUNDRED EIGHTY-NINE	

Print Date: 15-01-2013

Checked By:

Errors and omissions are subject to subsequent rectification.
 Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations
 Hazara University, Mansehra
 January 14, 2013

NOT POSTED



مدرسة مركزى دارالقرآن
پنجاب، پاکستان

كشف الدرجات

امتحان التعمير وحفظ القرآن الكريم

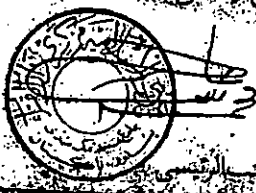
عام ٢٠٢٤
٢٠١٥

اسم الطالب: ناثية الفواز
اسم الوالد: التميم الفواز
تاريخ الميلاد: ٢٠١٥/٣/٢ المديرية: المنطقة الحضرية لبيات

الدرجات المحصلة	الدرجات النهائية	المادة
٤٥	١٠٠	١ التعمير جميع القرآن
٤٠	١٠٠	٢ الترتيل جزأ الواحدة من القرآن
٤٥	١٠٠	٣ كسب التحويد جمال القرآن، علم التحويد فوائد كبرى والمقدمة الحزينة
٤٥	١٠٠	٤ اجراء التحويد جميع القرآن
٨٥	١٠٠	٥ فقه و حديث تعليم الاسلام مع جهل حديث
٨٥	١٠٠	٦ ترجمه سورة الضحى الى سورة الناس
٢٢٥	٦٠٠	مجموع الدرجات

تشهد إدارة دارالقرآن مركزى

بتقدير محمد جبار



رقم التعمير: ٢٠٢٤
رقم الجلوس: ٢٢
رقم الاصل: ٢/٣/٢٠١٥
Reg. #: 344/5/391

ATTESTED



(8) (14)

Munir Ahmad Siddiqui - 0333 5079897

MINNEVURE C

GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar, 11.07.2012.

NOTIFICATION:**No. SO (B & A) / 1-18/E&SE/2012:**

Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

Non-nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	New Approved Basic Pay Scale	Remarks
Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
Senior Primary School Teach. (Sr. PST)	"do"	Newly Upgraded/ Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay Scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	20,804 posts of the existing PSTs (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Certified Teachers (CT)	Govt. Middle/High/Lower/Higher Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total DM's posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or

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Physical Education Teachers (PET's)	"do"	BS-09	(BPS-15)	All the existing posts of PET's are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
		BS-10		
		BS-12		
		BS-14		
		BS-15		
Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 rd) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
Qari/Qaria	"do"	BPS-7	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
		BPS-9		
		BPS-10		
		BPS-12		
		BPS-14		
Sr. Qari/Sr. Qaria	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	One thirds (1/3 rd) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. . . A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07/2012

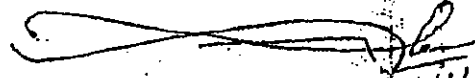
Copy is forwarded to Accountant General Khyber Pakhtunkhwa, Peshawar.
All District Account Officers


SECTION OFFICER (FR)
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.


(NOOR ALAM KHAN WAZIR)
SECTION OFFICER (B&A)
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

MINUTE

Consequent upon their selection by the Departmental Selection Committee, the Distt:Edu:Officer(Female/Secy:)Abbottabad/Haripur has been pleased to appoint the following Qaria candidates (rely on merit) is hereby ordered/appointed at the school noted against each in EPS-7 @ RS.1480-81-2695 and EPS-9 Rs.1605-97-3060 in case of RA II-Division, plus usual allowances as due and admissible under the rules with effect from the date of their taking over. Same subject to the terms and conditions as laid down:-

Sl. No.	Name/Father's Name with Address & D/O Birth.	No. of Merit/Marks obtained	School where appointed.	Remarks.
1.	Shazia Jalil d/o Abdul Jalil H.No.K-376 Moh:Kunj Qadeem, Abbottabad. 09.09.1976.	1/52.41	GGHS Samunder Katha.	Ag: vaca Qaria pos
2.	Farzana Farooq d/o Farooq Khan, Iqbal Town Mandian Atd: 18.2.1972.	2/42.05	GGHS Bearot.	---do---
3.	Safaida Noor d/o Sarwar Hussain, Vill:Kashka, PO Jhangra Atd: 8.3.1977.	3/42.03	GGHS Bakot.	---do---

Headmaster,
GGHS Samunder Katha
ABBOTTABAD.

TERMS AND CONDITIONS:-

01. They will be governed by such Rules & Regulation in force and as may be prescribed by the Govt: from time for the category of Govt: servant to they belong.
02. Their service as will be liable to termination on one month's notice from either side in case of resignation without notice one Month's pay will be forfeited in lieu thereof.
03. The appointment shall stand automatically cancelled if the candidate fails to join the duty within 15 days of the issue of this order.
04. Charge reports should be sent to all concerned and this office as well immediately.
05. They shall be on probation for the period of Two years.
06. The head of institutions are responsible to get verify the certificate Degree etc: from the concerned University/Board/RDE within one month the taking over charge and report of their genuines or otherwise submitted to this office.
07. They are required to produce their medical certificate.

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- 08. The above appointments are subject to the production the verification of original Degrees/Certificates to the concerned, Principal, P/Mir or this office any candidate if fails to produce requisite documents should not be allowed to take over charge and report submitted this office immediately.
- 09. The appott:shall stand automatically cancelled if the candidate fails to join the duty within 15 days of the issued of this order.
- 10. They should not be allowed to take over charge if they are below 18 years and above 40 years.
- 11. No TA/DA and etc is allowed to any one.

(MRS. SABIHA NAHEED)
 DISTT. EDUCATION OFFICER,
 (FEMALE/SECY:) ABBOTTABAD.

Endst:No. 3561-70 /AE-II. Dated the A/Abad 19/4 /1999.

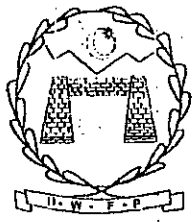
Copy to:-

- 1. PA to the Director Secy:Edu:NWFP, Peshawar.
- 2. PS to the Honourable Minister for Edu:NWFP, Peshawar.
- 3-5. The Principal/Headmistresses, concerned.
- 6-8. Candidates concerned.
- 9. The Distt: Accounts Officer, Abbottabad/Haripur.
- 10. The A.B.O (Accounts) Local Office.

Sabiha Naheed
 DISTT. EDUCATION OFFICER,
 (FEMALE/SECY:) ABBOTTABAD

Tariq Khan Jadoon

Tariq



**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELE: & SEC: EDU:
ABBOTTABAD**

APPOINTMENT

Consequent upon the approval of District Selection Committee the appointments of the following **Qaria (Female)** are hereby ordered in **BPS-07 @ Rs.3530-190-9230** plus usual allowances as admissible to them under the rules at the schools noted against their names in the interest of public service subject to the terms and conditions noted below:

Sr	R #	Name of Candidate	Father Name	Address	Place of Posting	Remarks
1	254	Sanam Zaman	Raja Fard uz Zaman	Havalian Cantt	GGHS.G/P/Gran	A/V/Post
2	126	Balques Bibi	S.Balawal Shah	Sailkote	GGHS.Sailkote	A/V/Post
3	125	Maryam Bibi	S.Balawal Shah	Sailkote	GGHS Beeran Gali	A/V/Post
4	03	Syeda Sadaf Sultan	Mustafa Shah	Richh Bhen	GGHS Rich Bhen	A/V/Post
5	193	Saira Parveen	Tariq Mehmood	Karach	GGHS Sajikote	A/V/Post
6	13	Syeda Abida Naz	S.Farman Shah	Richh Bhen	GGHS P/K/Khan	A/V/Post
7	306	Shagufta Parveen	Tariq Mehmood	Karach	GGHSS Hajja Gali	A/V/Post
8	08	Saima Abdul Ghafoor	Abdul Ghafoor Rashid	B/Qazi	GGHS Mallach	A/V/Post
9	72	Maira Malik	M/Pervaiz Khan	Pando Thana	GGHSS Sherwan	A/V/Post
10	303	Sajida Bibi	Fazal ur Rehman	Malik Pura	GGHS Kuthiyala	A/V/Post
11	52	Uzma Rashid	Abdul Rashid	Kuthwal	GGHS Bandi Maira	A/V/Post
12	111	Habib un Nisa	Shair Dil	Kakul	GGHS Sumandar Katha	A/V/Post

N. Shaban

TERMS AND CONDITIONS

1. The appointees will get initial allowances as admissible under the rules. They are entitled for annual increments after completion of one year of service, however they are not eligible for pension & gratuity as per current policy of the Govt: of NWFP.
2. The District Officer Elementary & Secondary Education Abbottabad should obtain security bonds as well as agreement bonds executed by each candidate to obey policy of Act 2005 and will not have right to challenge the policy in any court of law.
3. The services will be considered/dealt as per rules and regulations of the Govt. of NWFP.
4. Their services are liable to termination on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances, if any shall be forfeited in favour of the Govt: through challan.

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5. Contribution of C.P Funds is as per rules and regulation Govt. of NWFP.
6. The appointees should join their post with in fifteen days of the issue of this order positively otherwise the appointment shall stand cancelled.
7. Their services could be terminated at any time in case their performance is found unsatisfactory and they will be proceeded against under the removal from service (Special Power) ordinance 2000.
8. The appointees shall be required to furnish copies of all their certificates / degrees along with the original receipts and photocopy there of pertaining to the verification fee of concerned examining body (Board / University) to the District Officer Elementary & Secondary Education Department Abbottabad. The later shall arrange verification of all the certificates / degrees / diplomas of the appointee and will issue a clearance certificate to each appointee for the release of his / her pay. The pay bill should not be submitted to the District Accounts Officer Abbottabad before verification of all certificates / diplomas/degrees from the concerned institutions, herein all relevant documents must be submitted to the Exccutive District Officer Elementary & Secondary Education Department Abbottabad with in fifteen days of the issue of this order.
9. The Principal / Headmaster/ Headmistress concerned should personally check their original certificates / degrees and Domicile before handing over the charge.
10. The overage candidates should not be handed over charge, the age limit in respect of CT / DM / PET / AT / TT / Qari / Qaria is 18 - 33 years.
11. Charge report should be submitted to all concerned.
12. Appointment against disabled/deceased quota is made subject to the provision of the certificates issued by the competent authority & standing Medical Board.
13. Appointments will be based upon Act 2005 according to which no gratuity / pension is admissible.
14. The candidates already in service with regular training will have to produce approval / sanction of leave for the period failing which charge may not be handed over to them.
15. No TA/DA is allowed.

(Syed Bashir Hussain Shah)
 Executive District Officer
 (Etc: & Secy) Edu A.Abad

Endst: No. 11463-73 Dated A/Abad the 03 /6/2009

Copy to the: -

1. Director Elementary & Secondary Edu: Department NWFP Peshawar.
2. District Nazim Abbottabad.
3. District Coordination Officer Abbottabad.
4. Exccutive District Officer (F&P) Abbottabad.
5. District Accounts Officer Abbottabad.
6. District Officer (M&F) Elementary & Secondary Education Department Abbottabad.
7. Principal / HM /Headmistress concerned schools.
8. Budget & Accounts Officer Local Office.
9. Candidates concerned.
10. Office order file.

N. Shaha
 District Officer
 (E&S) Edu: Abbottabad.
 02/6/09

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NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification issued vide No. SO (B&A) 1-18/E&SE/2012 dated 11/07/2012 and Finance Department Endst No. SO (FR)/FD/10-22(E/2010) dated 16/07/2012, and in pursuance of the amended Notification No. SO (PE)4-5/SSRC/meeting2013/teaching cadre dated 24/03/2013, the following female Qaria BPs-12 are hereby upgraded to the post of Senior Qaria BPs-15 @ Rs. (16120-1330-56020) plus usual allowances as admissible under the rule with the terms and conditions given below in the interest of public service w.e.f 12/01/2018.

S.No	S/L No	Name of Teacher	School Name	New place of Posting	REMARKS
1	14	NAHEED ANWAR	GGHSS Lora	GGHSS Lora	Promoted and Posted in same School
2	15	SHAZIA JALIL	GGHSS Dhamtour	GGHSS Dhamtour	Promoted and Posted in same School
3	19	HABIB UN NISA	GGHS Kuthwal	GGHS Kuthwal	Promoted and Posted in same School

Terms and Conditions:-

1. On their promotion/Upgradation, the teachers concerned will be on probation for a period of 01 year in terms of section-6(2) of Khyber Pakhtunkhwa, civil servant Act 1973 read with rule 15 (1) of Act of servant (appointment, promotion/Upgradation and transfer rules 1981).
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found under the rules.
4. Their inter-se-seniority on lower post will be remained intact.
5. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them will be recovered from them if they are wrongly promoted and they will be reversed.
6. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within stipulated period, their promotion will be expired automatically and no sub-sequent appeals will be entertained.
7. Necessary entry should be recorded in their service books.
8. Charge report should be submitted to all concerned.
9. Checking of verification of all the documents shall be ensured by the DDO concerned.
10. No TA/DA is allowed.

District Education Officer
(Female) Abbottabad

Dated: 8 / 07 / 2018

Endst No: 1033-37 EB-III/

Copy for Information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account officer Abbottabad.
3. Concerned Principal/Head Mistress.
4. Official Concerned
5. Office file.

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To,

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

Subject: *Departmental Appeal Under Govt of KPK Civil Servant Rules "Right to Appeal" U/S-03-1 of 1986 for promotion of the appellant from Qaria BPS-12 to S/Qaria BPS-15 post.*

Respected Sir,

Facts leading to appeal are as under:-


1. That, the instant appeal is being filed vide Govt of KPK Civil Servant Rule "Right to Appeal" U/S-03-1 of 1986 and if it may not be decided within the specified period then appellant reserves her fundamental right to challenge the illegal Promotion Orders U/S -4 of NWFP now KPK Service Tribunal Act 1974 before proper Forum. The impugned promotion orders are illegal and Malafide of Respondents, which are liable to be set-aside inter-alia on the following facts and grounds:-
 - i) That, appellant was appointed as a "Qaria" in BPS-07. at GGHS Bakote, District Abbottabad on 17/01/1998 and took over charge on 01/03/1998.
 - ii) That, the appellant passed her B.A Examination from AIOU in 2nd Division in the year 2004 and passed M.A (Islamyat) from Hazara University Mansehra in the year 2012, as it is appellant passed B.Ed from AIOU Islamabad in the year 2013.
 - iii) That, the appellant was promoted from BPS-07 to BPS-09 on 01/07/2005 at the basis of passing Intermediate Exam in 2nd division in the light of the Notification dated 13/08/2005, issued by Govt of KPK Finance Department Peshawar.
 - iv) That, appellant was promoted from BPS-09 to BPS-12 on 01/07/2012 in compliance of Notification dated 11/07/2012, issued by Elementary & Secondary Education Department KPK, Peshawar and in the same notification it was also mentioned that the 1/3 of the total Qaria's posts are also being up-graded to BPS-15 at the basis of seniority cum faintness.
 - v) That, in the impugned orders, following most junior Qaria teachers has been promoted to S/Qaria posts but the appellant was badly ignored:-

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S.No.	Name	D/o appointment	D/o Promotion to S/Qaria	Name of School
1.	Farzana Farooq	01.05.1999	15.12.2015	GGHS Mirpur, ATD
2.	Uzma Rasheed	04.06.2009	15.12.2015	GGHS. Bandi Maira. ATD
3.	Marrum Bibi	04.06.2009	15.12.2015	GGHS. Ghumawan. ATD
4.	Maria Malik	04.06.2009	15.12.2015	GGHS. B. Dhundan. ATD
5.	Habib-un-Nisa	04.06.2009	15.12.2015	GGHS. Kuthwal. ATD
6.	Saira Parveen	05.06.2009	15.12.2015	GGHS. Sultanpur. ATD
7.	Syed Sadaf Sultan	05.06.2009	15.12.2015	GGHS. Kuthiala. ATD
8.	Sajida Bibi	05.06.2009	15.12.2015	GGHSS. Malikpura. ATD
9.	Balqees Bibi	12.06.2009	15.12.2015	GGHSS. Havelian. ATD
10.	Sabeela Bibi	18.01.2005	07.01.2016	GGHS. Berote. ATD
11.	Shagufta Parveen	04.06.2009	07.01.2016	GGHSS. Hajia Gali. ATD

- vi) That, the meanwhile, appellant promoted from Qaria to S/Qaria post on 08/02/2018 vide Endst: No. 1033-37 issued by DEO (F) Abbottabad and at the present appellant working as a S/Qaria at GGHSS, Lora, Tehsil Lora, District, Abbottabad in BPS-15.
- vii) That, the seniority of any employee is to be considered from the date of first appointment of the employee according to the Rules, Law, Policy and Judgment of the August Supreme Court of Pakistan.

In view of the above facts, grounds and Law, It is very, humbly prayed that on acceptance of instant Departmental appeal, Appellant may kindly be promoted to S/Qaria post with all back benefits, on the basis of seniority w.e.f. the date i.e. 15/12/2015, at which the most junior teacher, from the appellant, was promoted


NAHEED ANWAR (S/QARIA)
GGHSS, LORA,
Tehsil Lora, District, Abbottabad
Dated: 08/09/2020.

Copy for information:-

1. Secretary E&SE, Department, KPK, Peshawar.
2. DEO (Female) District, Abbottabad.
3. Principal-GGHSS, Lora, District, Abbottabad.

کورٹ فیس

وکالت نامہ

BEFORE THE KPIC SERVICE TRIBUNAL

بعدالت

مست ناہید انوار نامہ Cunt KPIA عنوان:

Appellant

منجانب:

Senior Appeal

نوعیت مقدمہ:

And

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

Kamran Khan vs Faridullah Khan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المقوم:

بمقام:

Accepted by

"B"

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

No.

Appeal No. 16420

of 20 20

Mst Nareed Anwar

Appellant/Petitioner

Msgr Sey: (E & SE)

Respondent

Respondent No. 3

Notice to:

DIST Education officer (E & SE)
(Female) A / Ahmad

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..... 15-2-22 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..... 17

Day of..... 1 22 ..20

at camp Court

A / Ahmad

[Signature]

[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.

10/11/20
Appellant's Name: *Mst Mansoor Ahmad*

Appellant's Petitioner

Respondent's Name: *Mrs. (Mrs.)*

Respondent

Notice to: *Dst Education Officer (E.S.E.)*
(Peshawar)

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on *12/11/20* at 8:00 A.M. If you wish to urge anything against the appeal/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorized representative or by an 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 along with 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

dated *12/11/20*

Given under my hand and the seal of this Court, at Peshawar this *12* Day of *Nov* 20*20*

Registrar
Khyber Pakhtunkhwa Service Tribunal
Peshawar

At Court
A. Iqbal

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