

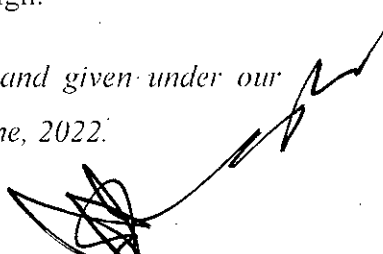
09.06.2022

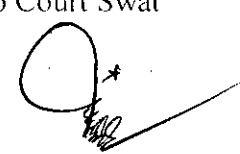
Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

An application alongwith copy of CNIC, has been submitted by the appellant requesting thereon for withdrawal of the instant service appeal No. 7258/2021 on the ground that she doesn't want to further pursue the case. As such, the service appeal in hand stands dismissed as withdrawn. Consign.

*Pronounced in open court at Swat and given under our hands and seal of the Tribunal this 09<sup>th</sup> of June, 2022.*



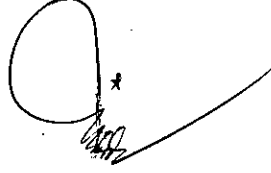
  
(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

  
(Mian Muhammad)  
Member (E)  
Camp Court Swat

8<sup>th</sup> June, 2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Counsel are on strike. To come up for arguments on 09.06.2022 before the D.B at camp court Swat. .



(Mian Muhammad)  
Member(E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

06.04.2022

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

Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to attend the Tribunal today due to strike of lawyers. Adjourned. To come up for arguments on 09.05.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)  
Member (J)  
Camp Court, Swat



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

09.05.2022

Due to non-availability of the Bench, the case is adjourned to 12.05.2022 for the same as before.

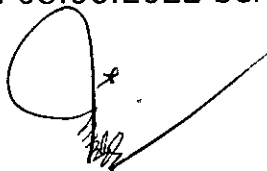


Reader


12.05.2022

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 08.06.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)  
Member (E)  
Camp Court Swat



(Salah-ud-Din)  
Member (J)  
Camp Court Swat

بعدالت جناب سروس ٹریبونل خیبر پختونخوا کیمپ کورٹ بمقام گلکدہ  
سید و شریف ضلع سوات

عنوان

مسماة حنیفہ بی بی نام حکومت KPK وغیرہ

درخواست بمراد واپس لینے مقدمہ عنوان بالا

جناب عالی! ذیل عرض ہے۔

(۱) یہ کہ مقدمہ عنوان بالا عدالت حضور میں زیر سماعت ہے جس میں آج تاریخ پیشی مقرر

ہے۔

(۲) یہ کہ مقدمہ عنوان بالا میں سائلہ کی دادرسی ہوئی ہے۔

(۳) یہ کہ سائلہ اب مزید مقدمہ بازی کرنا نہیں چاہتی اور مقدمہ بالا کو بلا مزید

کارروائی واپس لینا چاہتی ہے۔

لہذا استدعا ہے کہ منظور درخواست لھذا مقدمہ بالا کو بلا مزید کارروائی

داخل دفتر کرنے/ واپس لینے حکم صادر فرمایا جائے۔

 (العبدہ)

حرفہ:

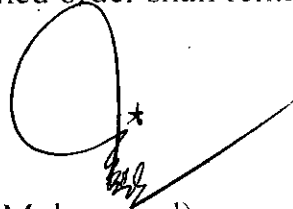
سائلہ: حنیفہ بی بی

شناختی کارڈ نمبر 2-15302-5644582

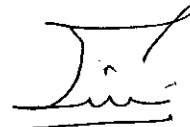
06.01.2022

Husband of the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Husband of the appellant requested for adjournment on the ground that his counsel is not available today due to general strike of the Bar. Adjourned. To come up for arguments on 09.02.2022 before D.B at camp court Swat. The operation of impugned order shall remain suspended till next date.



(Mian Muhammad)  
Member(E)



(Salah Ud Din)  
Member(J)  
Camp Court Swat

09.02.2022

Tour is hereby canceled .Therefore, the case is adjourned to 06.04.2022 for the same as before at Camp Court Swat.




Reader


08.12.2021

Nemo for parties.

Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

Both the parties including private respondent No. 4 be put on notice for 06.01.2022 for arguments before D.B at Camp Court, Swat. The operation of impugned order shall remain suspended till next date.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court, Swat

  
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

06.01.2022

~~Mustard for the appeal requested for adjournment of the appeal for respondents present~~

~~Mustard for the appeal requested for adjournment of the appeal for respondents present~~


~~Signature~~

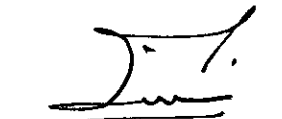
~~Signature~~

04.11.2021

Learned counsel for the appellant present. Mr. Riaz Khan Paindakhel, Assistant Advocate General for official respondents No. 1 to 3 present. Learned counsel for private respondent No. 4 present. Arguments on the application for setting aside of the ex-parte proceedings heard and record perused.

Private respondent No.4 was proceeded ex-parte vide order dated 15.09.2021, however he has submitted an application for setting aside of the ex-parte proceedings. The application filed by the appellant within time. Moreover, law also favour adjudication on merit by avoiding technicalities, therefore, the application is allowed. Reply/comments on behalf of private respondent No. 4 submitted, copy of which is handed over to learned counsel for the appellant. Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 08.12.2021 at Camp Court Swat. The operation of impugned order shall remain suspended till next date.

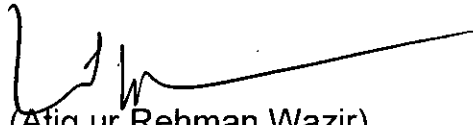
  
(Atiq-Ur-Rehman Wazir)  
Member (Executive)  
Camp Court, Swat

  
(Salah-Ud-Din)  
Member (Judicial)  
Camp Court, Swat

*Noted. Will  
by counsel  
for appellants*

Post Script  
07.10.2021

Later on, husband of private respondent No.4 appeared and submitted application for setting aside ex-parte proceedings against the said respondent. Copy of the same was handed over to the learned counsel for appellant. To come up for reply and arguments on 04.11.2021 before D.B at Camp Court, Swat.



(Atiq ur Rehman Wazir)  
Member(E)  
Camp Court, Swat

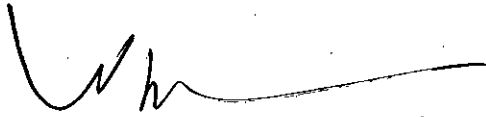


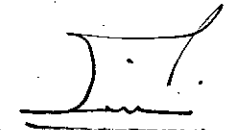
(Rozina Rehman)  
Member(J)  
Camp Court, Swat



15.09.2021

Mr. Muhammad Shahidullah, Advocate for the appellant present. Mr. Jan Bakhsh Said Superintendent alongwith Mr. Kabirullah Khattak Additional Advocate General for official respondent No.1 to 3 present. Private respondent No.4 is absent despite being summoned through registered post, hence placed ex-parte. Learned Additional Advocate General sought time for submission of reply/comments. Adjourned. To come up for reply/comments before the D.B on 30.09.2021. The operation of impugned order shall remain suspended till next date.

  
(ATIQ UR REHMAN WAZIR)  
MEMBER (EXECUTIVE)

  
(SALAH UD'DIN)  
MEMBER (JUDICIAL)

07.10.2021

Appellant present through representative.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Muhammad Usman ADEO for official respondents No.1 to 3 present.

Reply on behalf of official respondents No.1 to 3 furnished. Learned Members of the D.B.A are observing Sogh over the demise of Qazi Imdad Ullah Advocate and in this regard, request for adjournment was made; allowed. To come up for arguments on 04.11.2021 before D.B at Camp Court, Swat. The operation of impugned order shall remain suspended till next date.

(Atiq ur Rehman Wazir)  
Member(E)  
Camp Court, Swat

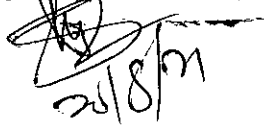
(Rozina Rehman)  
Member(J)  
Camp Court, Swat

20.08.2021

Counsel for the appellant present. Preliminary arguments heard.

According to the facts of the appeal, the appellant was transferred from GGPS Nasapa Talash to GGPS Soghalai vide order endst. No. 15738-61 dated 05.07.2021, available on the file as annexure-B at Page -13. However, subsequently the transfer of Mst. Ulfat Hina PST GGPS Giro Tangi (respondent No. 4) was made to GGPS Soghalai and transfer of the appellant was withdrawn vide order dated 03.08.2021 after about 27/28 days. Learned counsel for the appellant contends that the appellant had taken over the charge in GGPS Soghalai on 06.07.2021 in light of transfer order dated 05.07.2021 as per the copy of charge report produced during arguments. Further contends that she has not yet relinquished the charge of the said post. Further contends that the post in GGPS Soghalai was not vacant due to taking over the charge by the appellant but transfer of respondent No. 4 was wrongly made to GGPS Soghalai against the vacant post. Points raised need consideration. The appeal is admitted to full hearing, subject to all just and legal objections, including that of limitation to be determined during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 15.09.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

  
20/8/21

An application has been filed alongwith memorandum of appeal, seeking suspension of operation of impugned order No. 16052-54 dated 03.08.2021. Notice of the application be also given to the respondents. The operation of impugned order shall remain suspended till next date.



  
Chairman

Form- A

# FORM OF ORDER SHEET

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

Case No.- 7258 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/08/2021	<p>The appeal of Mst. Hanifa Bibi presented today by Mr. Muhammad Shahid Ullah 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>
2-		<p>This case is entrusted to S. Bench at Peshawar. Notice be issued to appellant/counsel for preliminary hearing to be put up there on <u>20/08/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

**CHECK LIST**

Case Title: حکومت پاکستان مقامہ سینیورٹی کی باج

S#	CONTENTS	YES	NO
1	This Appeal has been presented by <u>M. Shahid ulleh AHC</u>		
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?	✓	
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 paged?	✓	
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 AG/ DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?	✓	
15	Whether number of referred cases given are correct?	✓	
16	Whether appeal contains cutting / overwriting?		✓
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 are 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 /documentations as required in the above table, have been fulfilled.

Name:- Muhammad Shahid ulleh AHC

Signature:- Muhammad Shahid ulleh AHC

Dated:- 20/8/2021

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. 7258 /2021

Mst Hanifa Bibi

**VERSUS**

Govt. of Khyber Pakhtunkhwa and Others

**INDEX**

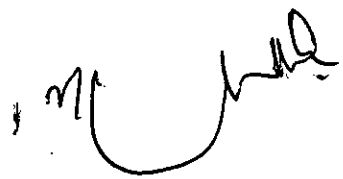
<b><i>S#</i></b>	<b><i>Description of Documents</i></b>	<b><i>Annex</i></b>	<b><i>Pages</i></b>
1.	Grounds of Petition		1-6
2.	Affidavit		7
2.	Application for Suspension		8
3.	Affidavit		9
3.	Addresses of Parties.		10
4.	Copy of Order	"A"	11-12
5.	Copy of Order dated: 05/07/2021	"B"	13-14
6.	Copy of Order dated: 03/08/2021	"C"	15-16
7.	Copy of Departmental Appeal No: 1355	"D"	17
9	Other Documents		18-19
10.	Wakalat Nama		20

Dated:

***APPELLANT***

Through

**Muhammad Shahid Ullah**  
Advocate, High Court  
Peshawar.



①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. 7258 /2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7456

Dated 20-8-2021

Mst Hanifa Bibi W/o Johar Ali (PST Teacher at GGPS  
Soghalai R/o Chino Talash, UC Bandagai, Tehsil Timargara,  
District Lower Dir.

....Appellant

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa through Secretary  
Elementary & Secondary Education, Civil  
Secretariat, Peshawar.
2. Director Elementary & Secondary Education, Civil  
Secretariat, Peshawar.
3. District Education Officer (F), Timargara, Dir  
Lower.
4. Mst. Ulfat Hina PST, GGPS, Giro Tangi, District  
Dir Lower.

....Respondents

**APPEAL FOR SETTING ASIDE**  
**THE IMPUGNED ORDER NO:**  
**16052-54, DATED 03/08/2021 OF**  
**THE OFFICE OF DISTRICT**  
**EDUCATION OFFICER (F)**  
**TIMARGARA, DIR LOWER,**  
**WHEREBY THE ORDER NO:**  
**15738-61 DATED: 05/07/2021**  
**WITHDRAWN BY THE**  
**RESPONDENT NO: 3, IN AN**  
**ILLEGAL & VOID MANNER.**

Filed to-day  
Registrar  
20/8/2021

Respectfully Sheweth

②

1. That the Appellant is a naturally born bonafide citizen of Islamic Republic of Pakistan & hails from a respectable family of District Dir Lower have every legal right to file the instant Service Appeal.
2. That the Appellant was appointed as a PST Teacher at GGPS Pato and now she is working at GGPS Soghalai Talash, district Dir Lower. (Copy of Order is annexed as Annexure "A")
3. That the Appellant was transferred from GGPS Nasapa Talash to GGPS Soghalai District Dir Lower against the vacant post vide Order dated: 05/07/2021. (Copy of Order dated: 05/07/2021 is annexed as Annexure "B")
4. That after 27 days, on dated: 03/08/2021 the Respondent No.3 very astonishingly withdrawn the Appellant's Transfer Order with malafide intention and with political influence and Respondent No.4 was transferred from GGPS Giro Tangi to GGPS

3

Soghalai on the same post. (Copy of Order dated: 03/08/2021 is attached as Annexure "C")

5. That the Appellant has been discriminated as she serve since her induction in service at the same place, so the Appellant having privilege right to be served in GGPS Soghalai District Dir Lower.
6. That feeling aggrieved, Appellant filed a Departmental Appeal No: 1355 on dated: 05/08/2021, which is still pending and has not been decided yet. (Copy of Departmental Appeal No: 1355 is annexed as Annexure "D").
7. That husband of the Appellant is also serving the same Education Department in same UC Bandagai as a Qari/ Teacher. Thus Spouse Policy is applicable here, while, in the case of the Appellant, it was not considered by the Respondent No.3, which is illegal and liable to be set aside.
8. That the impugned order is on every angle illegal, unlawful, void ab-initio and liable to be set aside.



(4)

9. That the above mentioned order is not applicable upon the rights of the Appellant as well as, it is a sheer violation of the law on the subject.
  
10. That feeling aggrieved and having the only remedy available being Civil Servant, the Appellant approaches this Hon'ble Tribunal for setting aside the impugned Withdrawn Transfer Order No: 16052-54 Dated 03/08/2021, issued from the Office of Respondent No.3. on the following grounds inter-alia:-

**GROUND:-**

- A. That the impugned transfer order is illegal, wrong, void ab-intio & is not sustainable at all.
  
- B. That the impugned transfer order is unwarranted, illegal & against the rules, hence not tenable in the eyes of law.
  
- C. That as the dictum & law governing the land it is a prima facie that where a law requires a thing to be done in a particular manner that has to be done in that manner & not otherwise.

5

D. That under the mandate of Article 4 of the Constitution, no one can be treated otherwise than in accordance with law, whereas Article 25 postulates that alike are to be treated alike but here the case of the Appellant is volta facie and totally different yardstick has been used to treat the petitioner.

E. That from every angle the impugned transfer order is wrong, illegal, void, against the rights of the Appellant & is liable to be set aside & by doing so the impugned order dated: 05/07/2021 must have to be retained as it was earlier.

F. That the Appellant seeks permission of this Hon'ble Tribunal to advance other relevant grounds at the time of arguments.

It is therefore, most humbly prayed that on acceptance of this Service Appeal, the Transfer Order No: 16052-54 dated: 03/08/2021 of D.E.O (F) Timargara Dir Lower, may kindly be set aside and the Appellant may kindly be allowed to carry

(6)

out her service at the same station GGPS  
Soghalai.

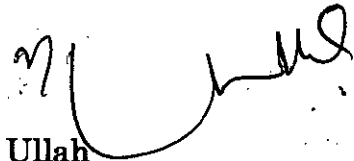
Any other relief not specifically asked  
for may also graciously be extended in favor  
of the Appellant in the circumstances of the  
case.

Dated:-

*APPELLANT*

Through

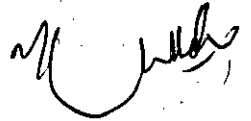
Muhammad Shahid Ullah  
Advocate, High Court  
Peshawar.



**NOTE:-**

As per information of my client, no such like appeal for  
the same Appellant, upon the same subject matter has earlier  
been filed, prior to the instant one, before this Hon'ble  
Tribunal.

Advocate.



7

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021

Mst Hanifa Bibi

**VERSUS**

Govt. of Khyber Pakhtunkhwa and Others

**AFFIDAVIT**

I, Mst Hanifa Bibi W/o Johar Ali (PST Teacher at GGPS R/o Chino Talash, UC Bandagai, Tehsil Timargara, District Lower Dir, do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*Hanifa*

DEPONENT

CNIC: 15302-5644582-2

CELL NO: 0346938419

*Identified by:*

Muhammad Shahid Ullah  
Advocate, High Court  
Peshawar.

*Muhammad Shahid Ullah*



*16-06-2021*

②

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021

Mst Hanifa Bibi

VERSUS

Government of KPK & Others

**Application for suspension of operation of impugned**  
**Withdrawn Transfer Order No: 16052-54 dated: 03/08/2021**

Respectfully Sheweth,

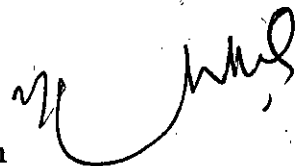
1. That the Appellant / Applicant is filing the instant application, the contents of which may very graciously be considered as integral part and parcel of the instant Application.
2. That Appellant has a good prima-facie case and balance of convenience lies in favor of the Appellant / Applicant.
3. That if the impugned withdrawn Transfer & Posting orders are not suspended, the Appellant / Applicant shall suffer irreparable loss.
4. That in given circumstances of the case, suspension of operation of the impugned Withdrawn Transfer Orders Dated 03-08-2021 are indispensable.

*It is therefore most humbly prayed that on acceptance of the instant application, the operations of impugned Withdrawn Transfer Orders may very graciously be suspended, till the final disposal of the instant Service Appeal..*

APPELLANT

Through

Muhammad Shahid Ullah  
Advocate, High Court



109

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021

Mst Hanifa Bibi

**VERSUS**

Govt. of Khyber Pakhtunkhwa and Others

**AFFIDAVIT**

I, Mst Hanifa Bibi W/o Johar Ali (PST Teacher at GGPS R/o Chino Talash, UC Bandagai, Tehsil Timargara, District Lower Dir, do hereby solemnly affirm and declare that all the contents of the instant applicaton are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*Hanifa*

DEPONENT

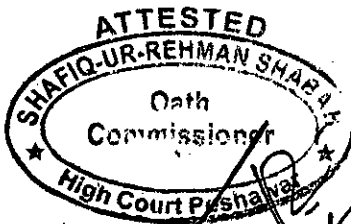
CNIC: 15302-5644582-2

CELL NO: 03469388419

Identified by:

Muhammad Shahid Ullah  
Advocate, High Court  
Peshawar.

*M. Shahid Ullah*



*Shafiq-ur-Rehman Sharaf*  
16-08-2021

10

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

In Re S.A No. \_\_\_\_\_/2021

Mst Hanifa Bibi

**VERSUS**

Govt. of Khyber Pakhtunkhwa and Others

**ADDRESSES OF PARTIES**

***PETITIONER.***

Mst Hanifa Bibi W/o Johar Ali (PST Teacher at GGPS R/o Chino Talash, UC Bandagai, Tehsil Timargara, District Lower Dir.

**ADDRESSES OF RESPONDENTS**

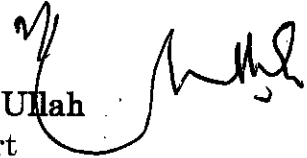
1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. Director Elementary & Secondary Education, Civil Secretariat, Peshawar.
3. District Education Officer (F), Timargara, Dir Lower.
4. Mst. Ulfat Hina PST, GGPS, Giro Tangi, District Dir Lower.

Dated:

***APPELLANT***

Through

Muhammad Shahid Ullah  
Advocate, High Court  
Peshawar.





(A) 11  
Amesuter  
R  
Timergara

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
DIR LOWER (Phone # 0945 9250083)  
URL: female.esedirlower.edu.pk**

**NOTIFICATION /APPOINTMENT**

Consequent upon the recommendation of Departmental Selection Committee, appointment of the following candidates are hereby ordered against the vacant PST posts on one year Ad-hoc School based policy in BPS12 (Rs.11140) Fixed PM plus usual allowances as admissible to them under the Rules and existing policy of the Provincial Government in Teaching Cadre on the terms & conditions given below in the interest of public service.

S.#	Name of Candidate	Father's Name	Union Council	D/O Birth	Score	School where appointed
1	SAEEDA	GUL MUHAMMAD	BAGH DUSH KHEL	14/03/1994	122.64	GGPA SHINAI
2	BUSHRA FAQIR	SWAL FAQIR	BAGH DUSH KHEL	02/02/1992	110.51	GGPS UTALA
3	BIBI MARYAM	SAID FAQIR BACHA	BAGH DUSH KHEL	05/01/1990	103.41	GGPS PINGAL
4	NIGAR	SHAHAB UD DIN	BAGH DUSH KHEL	12/04/1996	99.18	GGPS DOGAL
5	NISHAT BEGUM	GHULAM BADSHAH	BAGH DUSH KHEL	18/03/1986	95.76	GGPS KATTAN
6	FARHAT KARIM	FAZAL KARIM	BAGH DUSH KHEL	28/05/1989	91.21	GGPS INZARO
7	SHABANA BIBI	ABDUR RAHIM	BAGH DUSH KHEL	08/01/1989	85.52	GGPS BAGH DUSHKHEL
8	SAJIDA KOUSER	BAKHT ZAMEEN KHAN	BAGH DUSH KHEL	07/02/1989	77.81	GGPS KATTAN
9	KALSOOM BIBI	HAZRAT MANAF	BAGH DUSH KHEL	01/03/1985	77.64	GGPS KATTAN
10	NAZJA BIBI	MUHAMMAD IRSHAD	BAGH DUSH KHEL	03/07/1997	76.38	GGPS UTALA
11	NAHEED BIBI	SALEEM KHAN	BAGH DUSH KHEL	11/05/1989	74.26	GGPS INZARO
12	GULSHAN BANO	BAKHT JAMAL	BAGH DUSH KHEL	10/06/1996	72.39	GGPS CHINARONO
13	REENA GUL	MUHAMMAD RAHMAN	BANDAGAI	01/01/1992	117.68	GGPS GORO TALASH
14	RABIA NOUREEN	KHURSHID	BANDAGAI	01/05/1990	116.20	GGPS GORO TALASH
15	NIGHAT SULTAN	BADHSHA SHERIN	BANDAGAI	08/04/1992	111.68	GGPS BANDAGAI
16	SAMREEN RAFI	RAFIUDDIN	BANDAGAI	24/12/1993	105.68	GGPS BANDAGAI
17	SAIMA RAFI	RAFI UD DIN	BANDAGAI	30/12/1991	103.33	GGPS BANDAGAI
18	BIBI HIFSA	SAID JAN	BANDAGAI	07/05/1989	102.34	GGCMS DHERI TALASH
19	NUSRAT ZADA	FAZAL ZADA	KHUNGI	02/02/1987	126.28	GGPS SHAGAI TANGY
20	SAPNA SUMBAL	ANWAR ZEB	KHUNGI	02/01/1992	102.66	GGPS KHARKAI SIAR
21	LUBNA BEGUM	ANWAR ZADA	KHUNGI	16/01/1988	102.34	GGPS LETAI SIAR
22	AZRA BEGUM	MUHAMMAD USMAN	KHUNGI	18/12/1986	101.76	GGPS ZAIM SIAR
23	ISHRAT SAEED	SAEED UR RAHMAN	NOORA KHEEL	10/09/1986	103.59	GGPS AJO TALASH
24	ASSIA BIBI	JUMA SAID	NOORA KHEEL	05/04/1987	102.81	GGPS BANDA TALASH
25	NEELAM BIBI	MUQADAR KHAN	NOORA KHEEL	08/01/1990	100.65	GGPA KALO MANAI
26	NADIA	KHANANE KHAN	NOORA KHEEL	13/08/1989	99.68	GGPS NAGRI BALA
27	NASIM SAHAR	SAEED MUHAMMAD	NOORA KHEEL	15/01/1997	98.66	GGPS NAGRI PAYEEN
28	SHAISTA SAEED	SAEED MUHAMMAD	NOORA KHEEL	15/01/1996	96.08	GGPS KALO MANAI
29	MILLAT BIBI	MUHAMMAD PARVISH	NOORA KHEEL	10/03/1988	90.99	GGPS NAGRI PAEEN
30	HANIFIA BIBI	HUSAINUL HAQ	NOORA KHEEL	20/03/1996	89.42	GGPS PATO
31	NOOR PARI	MUHAMMAD RAFIQ	NOORA KHEEL	01/01/1984	89.35	GGPS NAGRI PAYEEN
32	MUSARAT BIBI	NADAR KHAN	NOORA KHEEL	01/05/1985	86.61	GGPS NAGRI BALA
33	ASMA GUL	HAJI SARDAR	SHAHI KHEL	15/06/1990	112.49	GGCMS TANGI SHAMSHI KHAN
34	RABIA BIBI	MUHAMMAD IKRAM	SHAHI KHEL	25/04/1993	103.06	GGPS GERD TANGAY

**Intikhab Photo State**  
Near National Bank Colony,  
Balambat Chowk, Timergara.  
Ph: 0945-822994, Mob: 0300-9398707

District Education Officer  
(Female) Dir (L)



18

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DIR LOWER AT TIMERGARA.**

**OFFICE ORDER.**

In partial modification of this office Endst: No 9008-15/PST/Appointment /Subdivision Timergara / Adhoc /NTS /2017 dated 28/03/2017 at S.No. 30, 32, & 33 of the order , the following further amendment are hereby ordered in the interest of public service.

S.No	Name of candidates	Adjusted at	May be read as
1	Mst: Hanifia Bibi	GGPS Pato Talash	GGPS Nagri Bala
2	Mst: Musarat Bibi	GGPS Nagri Bala	GGPS Pato Talsh
3	Mst: Asma Gul	GGCMS Tangi Shamshi Khan	GGPS Tangi Bala Shamshi Khan

Note:-

- 1.No T.A/D.A Is allowed
- 2.Charge report should be submitted to all concerned.

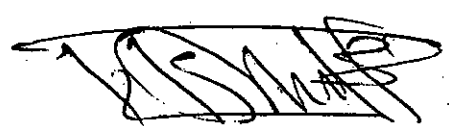
(Nusrat Bibi)  
District Education Officer  
(Female) Dir lower at Timergara

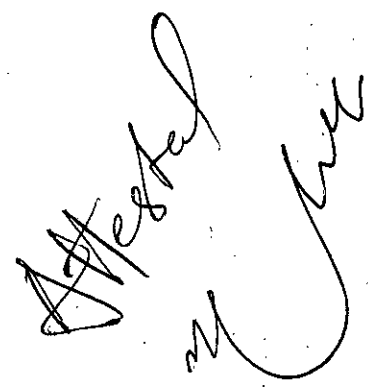
Endst: No. 976-80

Dated Timergara the 31/03/2017..

Copy of the above is forwarded for information to: -

- 1) Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 2) The District Nazim & Deputy Commissioner Dir Lower.
- 3) The District Accounts Officer Dir lower at Timergara.
- 4) The SDEO (Female) Timergara.
- 5) The candidates Concerned.

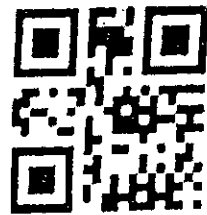
  
District Education Officer  
(Female) Dir Lower at Timergara



(B) 13

Amenhu

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) DIR LOWER



OFFICE ORDER

Consequent upon the submission of online applications by candidates in E-Transfer System and verification of scoring indicators, the following teachers are hereby transferred on vacant posts mentioned against their names with immediate effects in the interest of public services.

S.No	Name	Designation	From	Transfer To
1	NUSRAT MUHAMMAD	A.T.	GGHS DAG GOSAM	GGMS MALAKAND BALA
2	SALMA BIBI	A.T.	GGMS BAMBOLAI	GGMS MINA BHATAN
3	ZAINAB SHAHAB	A.T.	GGHS AUTO MAIDAN	GGHS BAGH DUSHKHEL
4	SAIMA SALMA	A.T.	GGHSS MAYAR JANDOL	GGHS KANDARO
5	SADIA BIBI	C.T	GGHS KHALL COLONY	GGMS BANDA TALASH
6	ASMA GUL	C.T	GGHS DAMTAL	GGMS BANDA TALASH
7	RABIA NOUREEN	C.T	GGHS INZARO	GGHS DARA RAMORA
8	SAEEDA BIBI	C.T	GGHSS MAYAR JANDOL	GGHS TIMERGARA
9	NABILA	C.T	GGMS DARMAL PAYEEN	GGMS SIYAR QALAGAI
10	SARA NEELAM	C.T	GGHS LIKOR KAMBAT	GGHS NARI TANGI
11	HABIBA	CT (IT)	GGHS JANGO	GGHS OSAKAI
12	UZMA SUNDUS	D.M.	GGHSS SAMARBAGH	GGMS KHEMA
13	SHABANA DARAKHSHANDA	D.M.	GGMS GAL MAIDAN	GGMS SADBAR KALAY
14	SABAHAT BEGUM	P.E.T.	GGMS GALKOR	GGMS MANDISH
15	HINA BIBI	P.E.T.	GGMS AJABAY	GGHSS ASBANR
16	SAIMA AKHTAR	P.E.T.	GGMS DALGRAM	GGHSS MIAN KALAY
17	SHAHEEN BEGUM	PSHT	GGPS MALAI RABAT	GGPS MARKHANAI RABAT
18	TASLEEM	PSHT	GGPS LASS KHAN	GGPS NARAY TANGAI
19	GHUNCHA BIBI	PSHT	GGPS GORO TALASH	GGPS KAMANGARA NO.2
20	HAFIA BIBI	PST	GGPS TEROONA NO.2	GGPS KAGAN
21	AZRA AMIN	PST	GGPS KHUNI DAND NO.2	GGCMS OUCH GHARBI
22	YASEEN	PST	GGPS GODAR	GGPS MUNDA NO.2
23	SADARAT BEGUM	PST	GGPS TOOT RATAI	GGPS LAJ BOOK

Attested  
District Education Officer  
(F) Dir. L.E. (L)

14

24	SOBIA GUL HAJRA	PST	GGPS ADAM DHERI	GGPS BRANGOLA
25		PST	GGPS TISSO	GGPS OSAKAI
26	RIZWANA	PST	GGPS BABAGAM	GGPS GORH MAIDAN
27	LIAQAT BIBI	PST	GGPS GUL ABAD MAIDAN	GGPS PARI KASS
28	MEHNAZ BEGUM	PST	GGPS MOLO MAIDAN	GGPS QILAGAI
29	SANIA BIBI	PST	GGPS SHAHALAM BABA	GGCMS SHAWA
30	SHAKILA BEGUM	PST	GGPS BARKHANI	GGPS PARI KASS
31	SANILA BIBI	PST	GGPS TABOO	GGPS MANYAL
32	SADAQAT	PST	GGPS KITYARI	GGPS SAFROONA
33	TAHIRA BIBI	PST	GGPS AWARO	GGPS BISHIGRAM
34	SHEEMA GUL	PST	GGPS KAMALA	GGPS NAGRAM
35	NEELAM BIBI	PST	GGPS SAFROONA	GGPS OUCH QILA
36	ZUMMRA BEGUM	PST	GGPS SALIM SHAH	GGPS TAZAGRAM
37	RABIA BIBI	PST	GGPS BAGH WALAI KANDOW	GGPS PANDA SHAH
38	HANIFA BIBI	PST	GGPS NASAFA TALASH	GGPS SOGHALAI
39	AYSHA GUL	PST	GGPS KHAIR ABAD	GGPS SHAH ABAD
40	RABIA BIBI	PST	GGPS DAPOOR	GGPS STANADAR
41	NEELAM NAWAZ	PST	GGPS GHALAGY DARA	GGPS SERAI RAMORA
42	SAIRA HAYAT	PST	GGPS SHAHALAM BABA	GGPS SHAWA BALA
43	SALMA MUSHTAQ	PST	GGPS KWERAY NO.1	GGPS PALOSO DAG
44	LUBNA BIBI	Qari/Qaria	GGHS MORANAI	GGHS TIMERGARA
45	RAHAM GUL	Qari/Qaria	GGHSS ASBANR	GGHS KOTIGRAM
46	SIDRA AMIR	Qari/Qaria	GGHS MALAKAND (P)	GGMS BANDA TALASH
47	NASIRA BEGUM	Senior C.T.	GGHS ODIGRAM	GGHSS MUNJAI
48	BACHAHAT	Senior PST	GGPS TIMERGARA NO.3	GGCMS KARZINA DIR
49	KHADIJA BIBI	SST (Bio-Chemistry)	GGHS NAMAZ KOT	GGHS MANYAL
50	SHAKEELA NAZ	SST (Bio-Chemistry)	GGHS MORANAI	GGHS BIYARAI
51	ABIDA BIBI	SST (General)	GGHS ZAIMDARA	GGMS TEKNAI PAYEEN
52	MULTAZIM	SST (Maths-Physics)	GGHS BAGH DUSHKHEL	GGHSS ZIARAT TALASH
53	KHADIJA	SST (Maths-Physics)	GGCMHSS TIMERGARA	GGMS WARSAK
54	SAFIA BIBI	T.T.	GGMS MALAKAND BALA	GGMS KHEMA
55	FARUKH NAZ	T.T.	GGMS MANDISH	GGMS KHUNGI

District Education Officer Female  
Dir Lower

Endst: No. 15738-61  
Copy forwarded to:

Dated: 05/07/2021

1. The Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Account Officer Dir Lower.
3. Principal/Head Mistress concerned.
4. The SDEOs Female Concerned.
5. The Teacher Concerned.
6. Office Record.

*Attest*  
*Smart Aru*  
District Education Officer Female  
Dir Lower

15

(C) Ammeter



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA

0995-9250083  
NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT, THERMAL TIMERGARA DISTRICT  
LOWER

OFFICE ORDER

Consequent upon the recommendation of the appointment committee Mst Ulfat Hina PST GGPS GeroTangi District Dir Lower is hereby transfer to GGPS Soghalal against vacant post in the interest of public service with immediate effect.

(ASMAT ARA QURESHI)  
DISTRICT EDUCATION OFFICE  
(FEMALE) DIR LOWER AT T/GARA

Dated Timergara the: 3/08/2021

Order No. 16049-51-1

- Copy of the above is forwarded to:
- 1. Director of Education, Peshawar
- 2. District Education Officer, Dir Lower
- 3. SDEC, Dir Lower
- 4. Office Record

*Asmat Ara*  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA

BETTER COPY NO.15

OFFICE OF THE

DISTRICT EDUCATION OFFICER (F)

DIR LOWER AT TIMERGARA

094592583

DEO Female Dir Lower

NEAR POLICE LINE EDUCATION COMPLEX BALAM BUT TEHSIL TIMERGARA  
DISTRICT DIR LOWER

**OFFICE ORDER**

Consequent upon the recommendation of the appellant committee Mst. Ulfat Hina PST GGPS Gero Tangi District Dir Lower is hereby transfer to GGPS Soghalai against vacant post in the interest of public service with immediate effect.

(ASMAT ARA QURESHI)

DISTRICT EDUCATION OFFICER

(FEMALE) DIR LOWER AT T/GARA

Endst: No. 16054-51

dated Timergara the :03/08/2021

Copy of the above is forwarded to:

1. The Director E&SE KPK Peshawar.
2. The District Account Officer Dir Lower
3. The SDEO (F) concerned Dir Lower
4. Office record.

DISTRICT EDUCATION OFFICER

DIR LOWER AT TIMERGARA



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA



0545-0250083 DEO FEMALE DIR LOWER  
NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT TENGGI, TIMERGARA DISTRICT DIR  
LOWER.

OFFICE ORDER

Consequent upon the recommendation of the appellant committee transfer order issued vide this office Endst: No 15738-61 dated 05-07-2021 at serial no 38 in respect of Hanifa Bibi PST GGPS Nasafa to GGPS Soghalal Dir Lower as hereby with drawn in the interest of public service with immediate effect

(ASMAT ARA QURESHI)  
DISTRICT EDUCATION OFFICE  
(FEMALE) DIR LOWER AT T/GARA

Endst No 16052-541

Dated Timergara the: 03/08/2021

Copy of the above is forwarded to

*Attest*  
*[Signature]*

*Asmat Ara Qureshi*  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA

(17)

cc  
Aa D

بخدمت جناب ڈائیر کٹر ESED خیبر پختونخواہ بمقام پشاور

اپیل سائیکلہ بر خلاف آفس آرڈر نمبری: 16052-541

مورخہ: 03/08/2021

جناب عالی/عالیہ! حسب ذیل عرض ہے۔

۱۔ یہ کہ سائیکلہ موضع چینو تالاش یونین کونسل بانڈہ گئی تحصیل تیمرگرہ ضلع دیرپاکین کی باشندہ ہو کر GGPS سوغالے تالاش تحصیل تیمرگرہ ضلع دیرپاکین میں بحیثیت PST تعینات ہے۔

۲۔ یہ کہ سائیکلہ کی ٹرانسفر GGPS سوغالے میں بہ Endst: No 15738-61 مورخہ: 05/07/2021 کو ہوئی تھی اور سائیکلہ نے اسی دن چارج بھی لیا تھا، لیکن مذکورہ بالا آرڈر نمبری: 16052-541 پر مذکورہ آرڈر کو ایک بار پھر منسوخ کر دیا گیا۔ حالانکہ سائیکلہ کی شادی نورہ خیل یونین کونسل سے یونین کونسل بانڈہ گئی میں ہوئی ہے اور سائیکلہ کو مذکورہ GGPS ناصافہ میں اب قواعد و ضوابط ESED کے تحت اپنے یونین کونسل میں فرائض انجام دینے ہیں لیکن مذکورہ جٹی کے ذریعے سائیکلہ کو اپنے یونین کونسل میں فرائض انجام دینے کے حق سے محروم کر دیا گیا۔

۳۔ یہ کہ سائیکلہ کا شوہر بھی یونین کونسل بانڈہ گئی، محکمہ تعلیم ضلع دیرپاکین میں اپنے خدمات انجام دے رہا ہے بدیں وجہ بھی سائیکلہ کو آنے جانے میں بصورت منسوخی ٹرانسفر مذکورہ مشکلات درپیش ہوگی، حالانکہ قواعد و ضوابط کے مطابق شوہر ہوی نزدیک ٹیسٹ پر تعینات ہونے چاہئیں۔

۴۔ یہ کہ سائیکلہ کو اپنے یونین کونسل بانڈہ گئی تالاش ضلع دیرپاکین میں تعیناتی کے احکامات صادر کرنا قرین انصاف ہے۔

بحالات بالا استدعا ہے کہ درخواست سائیکلہ منظور فرمایا جا کر سائیکلہ کی اپنی یونین کونسل بانڈہ گئی تالاش میں تعیناتی کے احکامات صادر فرمائیں۔

مورخہ: 04/08/2021

*Pamfa*  
سائیکلہ اخیفہ بی بی زوجہ جوہری

پست نمبر: 00865885

*Alleged*



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
DIR LOWER (Phone # 0945 9250081-82)

12

**OFFICE ORDER**

Consequent upon the recommendation of the District Selection/Promotion Committee Dir Lower in its meeting held on 18/01/2020 and in pursuance of Govt: Khyber Pakhtun Khwa (E&SE) Department Notification No SO(PE)4-5/SSRC/ Meeting 2012/ Teaching Cadre, Dated 13/11/2012 the following Qaris BPS:12 (Male) are hereby promoted to Senior Qaris BPS-15 @ (16120-1330-56020) plus usual allowances as admissible to them under the rules on regular basis under the existing policy of the provincial Government, in the schools noted against their names, on the terms and conditions given below, in the interest of public with immediate effect.

**PROMOTION OF QARI BPS-12 TO THE POST OF S.QARI BPS-15.**

S#	S.L. NO.	NAME OF OFFICIAL	PRESENT PLACE OF POSTING	SCHOOL WHERE ADJUSTED	REMARKS
1	33	FAZAL SALAM	GHS DALGRAM	GHSS: KAMALA	A.V.P
2	42	RIAZ UL HAQ	GHS ASHARKOR	GHS: SADBAR KALAY	A.V.P
3	43	HAFIZ UR RAHMAN	GHS BIARAI	GHSS: HAYASERAI	A.V.P
4	44	IBRAHIM JALIL	GHSS MALAKAND	GHSS: KHALL	A.V.P
5	46	MURAD ALI	GHS ODIGRAM	GHS: ODIGRAM	ALREADY OCCUPIED.
6	47	FASIH ULLAH	GHSS ZAIMDARA	GHSS: ZAIMDARA	ALREADY OCCUPIED
7	48	IRSHAD GHAFOOR	GHS SHORSHING	GHSS: MIAN BRANGOLA	A.V.P
8	49	LIAQAT ALI	GHS DHERAI TALASH	GHSS: KOTIGRAM	A.V.P
9	50	NAIK ZADA	GHSS MIAN KALAY	GHSS: MIAN KALAY	ALREADY OCCUPIED
10	51	NOOR ZAMAN KHAN	GHS TAKWARO	GHSS: TAKWORO	ALREADY OCCUPIED
11	52	SADIQ ULLAH	GHS MIAN BANDA	GHS: MIAN BANDA	ALREADY OCCUPIED
12	53	UMARA HAYAT	GHSS KHAIR ABAD	GHS: RAMORA	A.V.P

**THE FOLLOWING QARIS ARE HEREBY ADJUSTED CONSEQUENTIALLY.**

S#	NAME OF OFFICIAL	PRESENT PLACE OF POSTING	SCHOOL WHERE ADJUSTED	REMARKS
1	TAHIR KHAN	GHS KAMALA	GHS MAYAR KHADAGZAI	AVP
2	AYAZ MUHAMMAD	GHS SADBAR KALAY	GHS GUL MUQAM	AVP
3	SHAHID ALI	GHSS MIAN BRANGOLA	GHS TAWDA CHINA	AVP
4	JAUHAR ALI	GHS RAMORA	GHS DHERAI TALASH	V No 8
5	SABIR IRSHAD	GHSS KOTIGRAM	GHSS KHAIR ABAD	V NO 12

**TERMS AND CONDITIONS:**

1. They will be governed by such rules and regulations as issued from time to time by the Govt.

*Abdullah*



They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order, will be recovered and if some one is found wrongly promoted, they will be reversed.

5. NO TA/DA will be paid to them on joining the post.

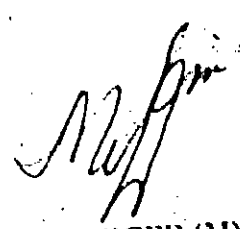
19

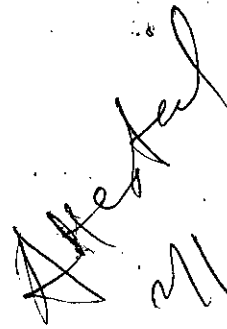
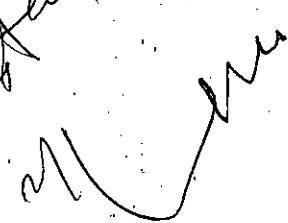
(MEFTAN-UD-DIN)  
DISTT: EDUCATION OFFICER (M)  
DIR LOWER AT TIMERGARA

Endst: No. 649-55 dated Timergara the 21/11/2021

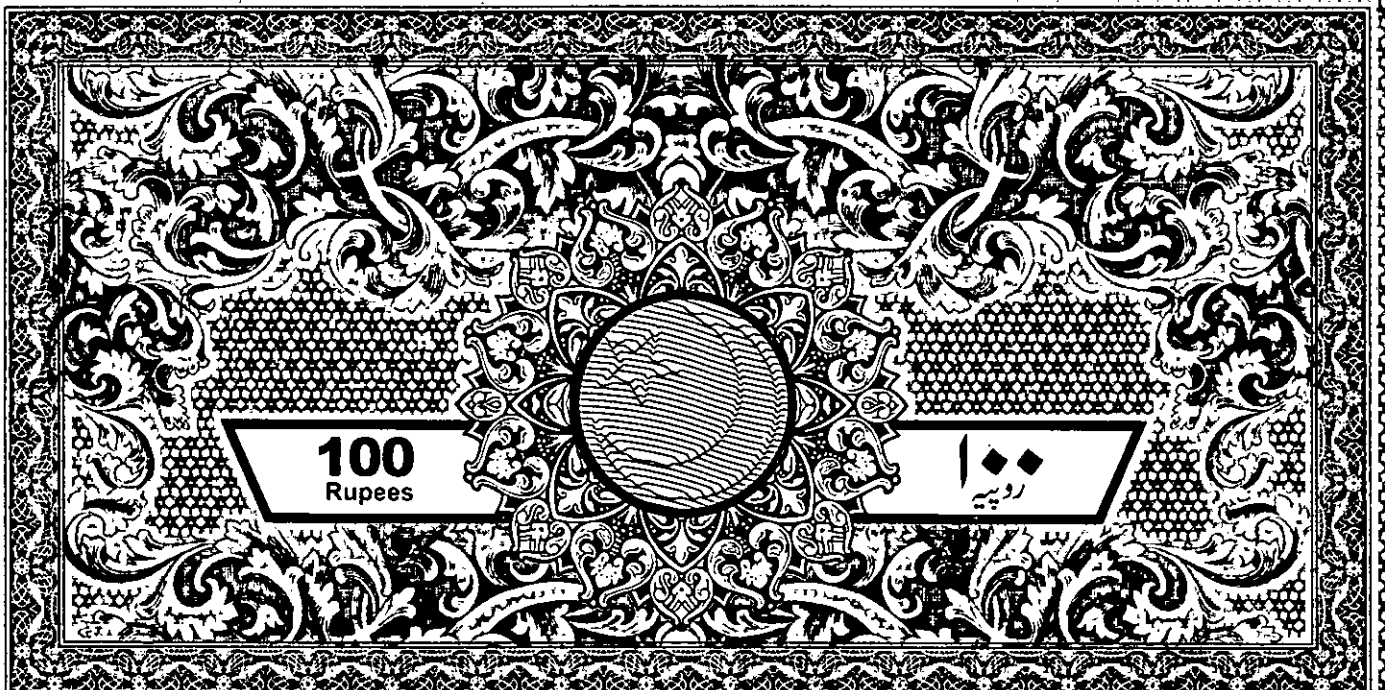
Copy of the above is forwarded to:-

1. The Director (E&SE) Khyber Pakhtun Khwa Peshawar.
2. The District Account Officer Dir Lower.
3. The Principal/Headmaster of the institute concerned.
4. The Deputy District Education Officer (M) Dir Lower.
5. The Official Concerned.
6. Master File.

  
DISTT: EDUCATION OFFICER (M)  
DIR LOWER AT TIMERGARA

Li  
Per  
City  
Tem  
City:



100  
Rupees

۱۰۰  
روپیہ

## بعدالت جناب سروس ٹرائیونل پشاور

گورنمنٹ خیبر پختونخواہ وغیرہ

بنام

مسماة حنیفہ بی بی وغیرہ

مختیار نامہ خاص برائے پیروی مقدمہ

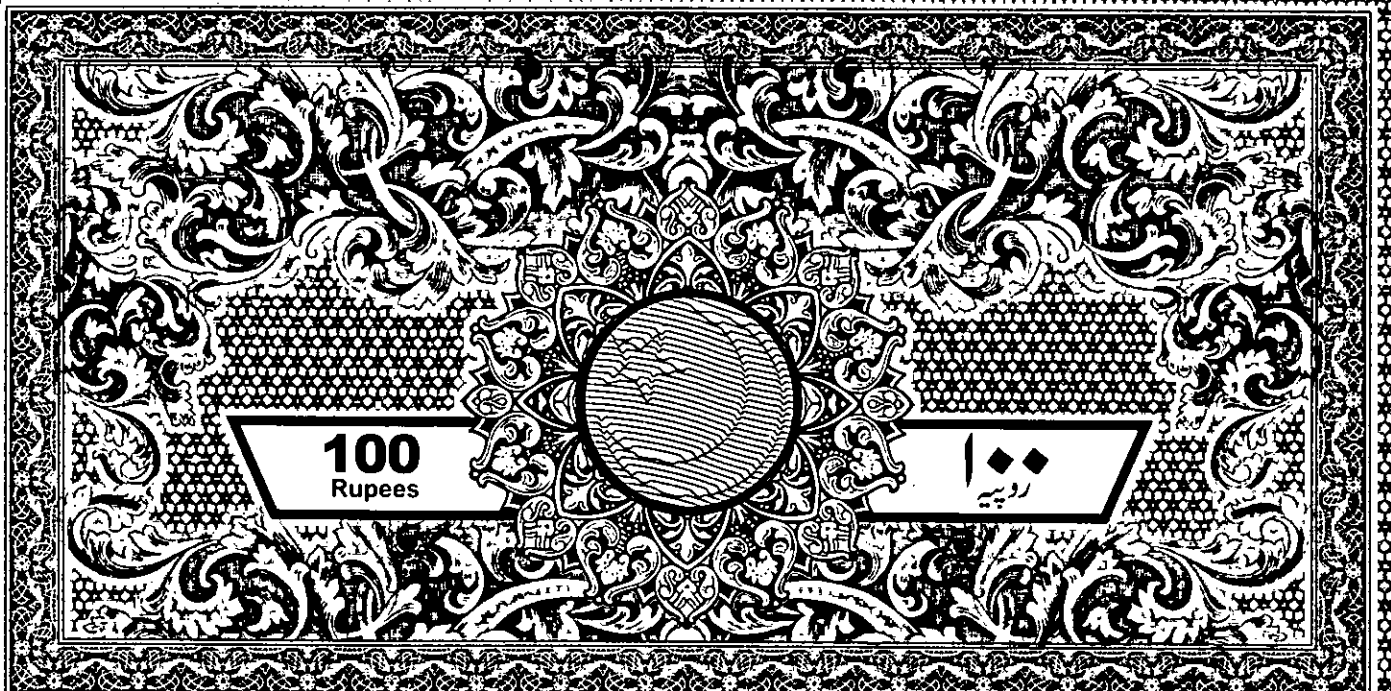
مسماة حنیفہ بی بی زوجہ جوہر علی سکندہ چیونٹالاش ڈاکخانہ سرائی بالا تحصیل تیسر گره ضلع لوئر دیر کی ہوں، بدیں وقت بقائمی ہوش و حواس  
خسہ کے اقرار کر کے لکھ دیتی ہوں کہ مامقرہ کا ایک عدد مقدمہ بعدالت جناب سروس ٹرائیونل پشاور بعنوان بالادائر کیا جا رہا ہے۔  
جس میں مامقرہ بوجہ پردہ نشینی کے مقدمہ ہذا کی پیروی کرنے سے قاصر ہے۔ لہذا اپنی جانب سے جوہر علی ولد حضرت ولی سکندہ چیونٹ  
تالاش ڈاکخانہ سرائی بالا تحصیل تیسر گره ضلع لوئر دیر کو مقدمہ میں مختیار خاص مقرر کر کے کلی اختیار دیتی ہوں کہ مختیار موصوف مقدمہ  
ہذا کی پیروی کرے، جواب دعویٰ جواب داخل کرے، فہرست گواہان پیش کرے، بیان حلفی دیوے، بیان تحریری دیوے، بیان زبانی  
دیوے، درخواست گزارے، راضی نامہ کرے، اپیل دائر کرے، ڈگری اجراء کروائے، نظر ثانی کروائے، وکیل یا ایڈووکیٹ کا تقرر  
کرے، اور جملہ کاغذات پر دستخط خود سرانجام دیوے، نیز ہماری جانب سے بینک سے رقم وصول کرے، ادا کرے اور مختیار خاص جو بھی  
کاروائی مناسب سمجھے کرنے کا مجاز اور حقدار ہونگے یہ کہ مختیار خاص از عدالت ابتدائے تاسپریم کورٹ آف پاکستان مقدمہ ہذا کی پیروی  
کرے، الغرض مختیار موصوف کی جملہ کاروائی ساختہ پرداختہ ہم مقرران کو بمثل کردہ ذات خود کے منظور و قبول ہوگا۔

الرقوم: 16 اگست 2021

لہذا مختیار نامہ بابت مقدمہ پیروی لکھ دیتا کہ سندر ہے اور بوقت ضرورت کام آدے۔



شہادت  
16-08-2021



100  
Rupees

۱۰۰  
روپیہ

اختیار دہندہ

----- العبد

مسماة حنیفہ بی بی زوجہ جوہر علی

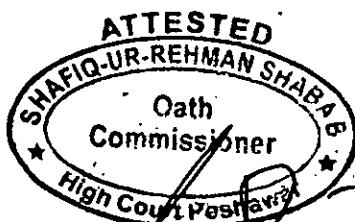
شناختی کارڈ نمبر: 15302-5644582-2

اختیار گریہندہ

----- العبد

جوہر علی ولد حضرت ولی

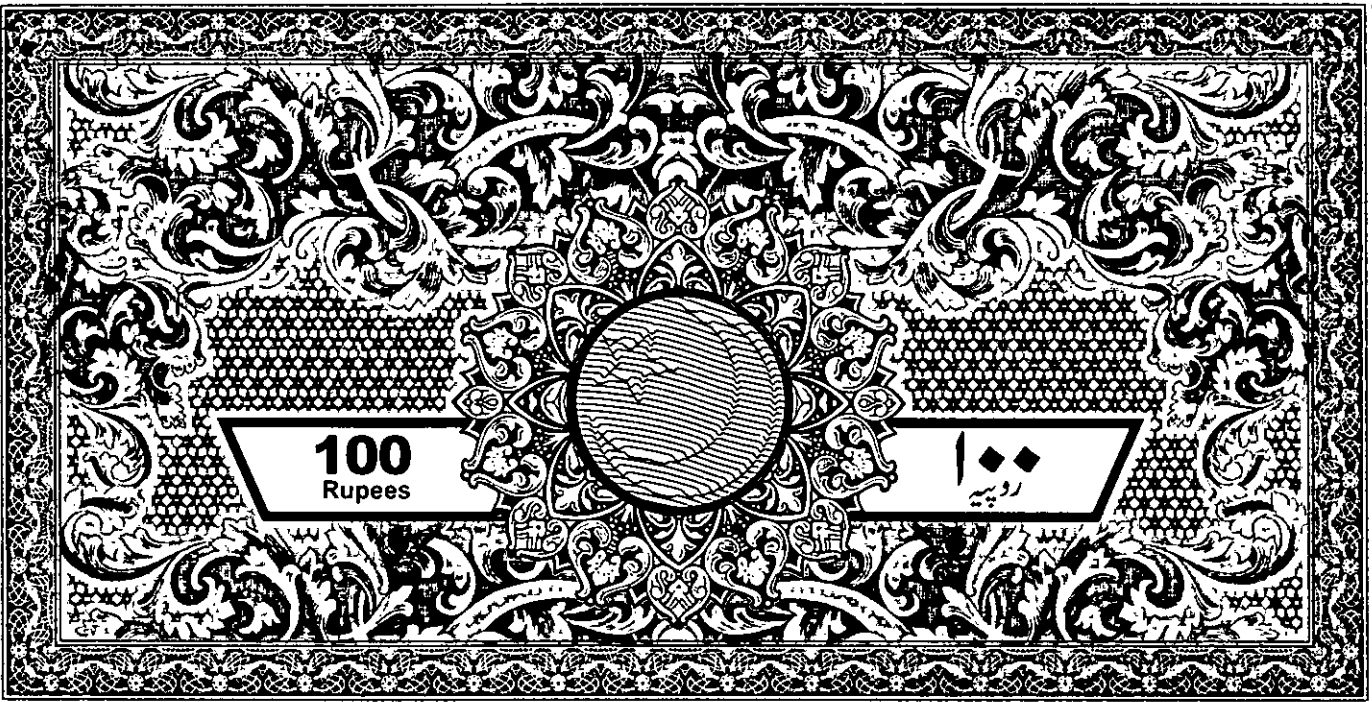
شناختی کارڈ: 15302-2087557-1



Oath  
Commissioner

High Court Peshawar

16-08-221



گواہ شد 2 \_\_\_\_\_  
 نام: \_\_\_\_\_  
 شناختی کارڈ: \_\_\_\_\_

گواہ شد 1 \_\_\_\_\_  
 نام: \_\_\_\_\_  
 شناختی کارڈ: \_\_\_\_\_



*Shafiq-ur-Rehman Shaeer*

16-08-2021

قیمت  
50 روپے

93511

ایڈووکیٹ: محترم سید اسد اسد صاحب سہیل سہیل

بار کونسل ایسوسی ایشن نمبر: BC-16-7151

رابطہ نمبر: 03415257453



پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سروس ٹرانسپونل سگاور

مخانب: سائیک	دعویٰ: Service Appeal
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
<b>باعث تحریر آنکہ</b>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کارروائی متعلقہ کر  
 آن مقام سگاور کیلئے محترم سید اسد اسد صاحب سہیل سہیل کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرہے و تفریق ثالث فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از جرم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور ہٹوئی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کر جانے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لائے جانے کے لئے اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو چیز کہہ رہے جانے اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

مسماة صفی بی بددہ صفا خاص جو پری

المرقوم: 20/8/2024

Attested  
 محمد اسد  
 Shahid  
 Atte

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

17

20/8/2021

CHARGE REPORT

In Compliance with the Deputy Distt Edu Officer (F) Dir Lower E Transfer order No 15738-01 Dated 05/07/2021.

I Hanifa Bibi PST took over the complete charge of my duties at GGPS Soghalai today on 06/07/2021 (A.N)

Charge report is hereby submitted for information and N/A please.

NO: .....GGPS Soghalai

Dated: 06/07/2021

Copy of the above is Forwarded to:-

- 1) Distt Education Officer (F) Dir Lower
- 2) SDEO (F) Tinergara.
- ✓ 3) Distt Account Officer Lower Dir.
- 4) The Teacher Concerned.

*Hanifa Bibi*

Hanifa Bibi

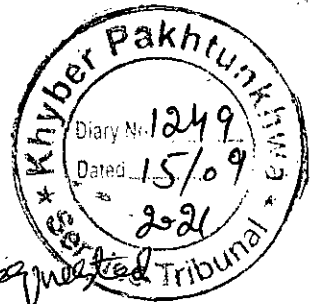
GGPS Soghalai

*N/A*

Head Teacher 7/7/2021

GGPS Soghalai (A.N)

410  
لجالت عالیہ - جسٹس صاحب  
Service برائے چیف جج اور



Put up to the worthy chairman  
with relevant app. 3  
مسماہ حیفہ بی بی

Reader

علی محمد صاحب  
15/8/21

Allotted as requested  
17/9/2021

درخواست نمبر 15/8/21  
Transfer کر کے  
اپنی بی بی کو سوت نمیب کو لے کر

صاحب عالی  
درخواست دہل علی صاحب

(i) میری مقدمہ عنوان بالا DBII میں آج ریم سماعت تھا

جس کی آئندہ تاریخ نہیں ہے 30 دسمبر 2021

(ii) یہ کہ Appellant دہل کو میرا کا آئندہ ہے اور

ان کے پاس سے دستاویزی ہے

(iii) یہ کہ کوئی کوئی قانونی امر صبح نہ ہے

لہذا اس پر غور ہے کہ یہ بی بی کو سوت

بی بی کو سوت کے Appellant کا Appellant کو سوت  
نمیب کو لے کر Transfer کر کے ہم ہمارے پاس

علی محمد صاحب

مسماہ حیفہ بی بی بزرگوار

**BEFORE THE HONORABLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

Service Appeal No.3382/2021

1.Mst.Hanifa Bibi W/O Johar Ali (PST at GGPS Soghalai R/O Chino Talash, Union Council Bandagai, Tehsil Timergara District Dir Lower. .... (Appellant)

Versus

1. Govt of Khyber Pakhtunkhwa through Secretary, Elementary &Secondary Education, Khyber Pakhtoon khwa Peshawar.
2. Director, Elementary &Secondary Education, Khyber Pakhtoon khwa Peshawar.
2. District Education Officer Female, Dir Lower at Timergara.
3. Mst. ulfat Hina PST, GGPS Giro Tangi, District Dir Lower.

(Respondents)

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District Education Officer (F)

District Dir Lower

(Respondent No.3)



**BEFORE THE HONORABLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

Service Appeal No.7258/2021

1. Mst.Hanifa Bibi W/O Johar Ali (PST at GGPS Soghalai R/O Chino Talash, Union Council Bandagai, Tehsil Timergara District Dir Lower. .... (Appellant)

Versus

1. Govt of Khyber Pakhtunkhwa through Secretary, Elementary &Secondary Education, Khyber Pakhtun khwa Peshawar.
2. Director, Elementary &Secondary Education, Khyber Pakhtun khwa Peshawar.
3. District Education Officer Female, Dir Lower at Timergara.
4. Mst. ulfat Hina PST, GGPS Giro Tangi, District Dir Lower.

(Respondents)

**REPLY ON BEHALF OF RESPONDENTS No.1 TO 3.**

Respectfully sheweth:-

**PRELIMINARY OBJECTIONS**

1. That the Applicant is not the "aggrieved" persons with the meaning of Article 212 of the Constitution of the Islamic Republic of Pakistan 1973.
2. That the Applicant has got no cause of action /locus standi to file this application because the Applicants did not come on merit.
3. That the application in hand is barred by the relevant provision of Law/Rules/Policy in Field.
4. That the Applicants are estopped by his own conduct.
6. That the instant Appeal petition suffers from laches, hence not maintainable in the present form.
7. That as per tenure the applicant was not eligible/entitled for transfer through e-transfer policy.

**FACTS**

1. Para-1 of the facts pertain to record regarding the address of the applicant as the petitioner was resident of Union Council NooraKheil and was appointed in the union council ibid as per her domicile whereas she seeks relief for transfer to the school lying in the domain of the Union Council Bandagai.

2. Para-2 of the facts is correct but in detail it is stated that the petitioner was appointed as PST GGPS Pato Union Council Nora Kheil , vide Order dated 28-03-2017, in partial modification the appellant was again adjusted in GGPS Nagra Bala Vide order dated 31-03-2017, later on after filling of application for transfer , she was transfer from GGPS Nagra Bala to GGPS Nasafa where she took over charge vide dated 20-04-2020. Hence the total tenure of the applicant /appellant in the present school is immature, so her transfer order was withdrawn while the respondent No.4 was appointed at GGPS Gero tangi vide order dated 28-03-2017 and she remained in the said school till the transfer been eligible the competent authority allowed/accepted the appeal of the Respondent No.4, So she was transferred as per policy and rules.

3. Para- 3 of the facts is correct in detail again it is stated that as per policy her tenure was immature for transfer so the competent authority withdrawn her transfer order as per policy and rules.

4. Para-4 of the facts is incorrect hence denied, and further stated that the appellant malafidely applied for e-transfer with incorrect information on the basis of which she was transfer ,later on an appeal was lodge by Respondent No.4 after scrutiny of the record of both the appellant and respondent No.4 , the information provided by the appellant was fake/frivolous and was not eligible for transfer so her transfer order was withdrawn after following all codal formalities and respondent no,4 being eligible was transfer as per polices and rules.

5. Par- 5 Need no comments

6. Para-6 is also correct and further stated that the appellant without waiting for disposal of her appeal she filed the instant service appeal, hence not maintainable in the present form and liable to be dismissed.

7. Para-7 Pertains to record needs no comments.

8. Para-8 is incorrect hence denied .detail has been submitted in the above Para's.

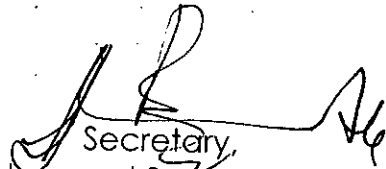
9. Para -9 is also incorrect hence denied.

10. Para -9 is also incorrect hence denied. It is stated that the Appellant has got no cause of action /locus standi to file this application because the Applicants did not come on merit.

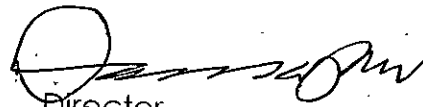
## GROUNDS:

- A. Incorrect .hence denied whereas respondents departments also follow rules and policies in letter in spirit, the transfer order of the appellant was rejected as per law and rules.
- B. Need no comments.
- C. Need no comments.
- D. Incorrect hence denied. Detail reply has been submitted in the facts above.
- E. Incorrect hence denied. Detail reply has been submitted in the facts above.
- F. Legal. However the official respondents also seek permission for additional grounds during arguments.

It is therefore, humbly prayed that on acceptance of the above submission, the instant Service Appeal may very graciously be dismissed in favor of the answering respondent with heavy cost.



Secretary,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
**(Respondent No.1)**



Director,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
**(Respondent No.2)**



District Education Officer (F)  
District Dir Lower  
**(Respondent No.3)**

**BEFORE THE HONORABLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR.**

Service Appeal No.7258/2021

1. Mst.Hanifa Bibi W/O Johar Ali (PST at GGPS Soghalai R/O Chino Talash, Union Council Bandagai, Tehsil Timergara District Dir Lower. ... (Appellant)

Versus

1. Govt of Khyber Pakhtunkhwa through Secretary, Elementary &Secondary Education, Khyber Pakhtun khwa Peshawar.
2. Director, Elementary &Secondary Education, Khyber Pakhtun khwa Peshawar.
3. District Education Officer Female, Dir Lower at Timergara.
4. Mst. Ulfat Hina PST, GGPS Giro Tangi, District Dir Lower.

(Respondents)

**Affidavit**


I, Muhammad Usman ADEO O/O the DEO(F) Dir Lower do hereby solemnly affirm and declare that contents of the accompanying para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this August court.


  
Deponent  
Muhammad Usman



**AUTHORITY LETTER**

Mr. Muhammad Usman ADEO O/O the DEO (F) Dir Lower is hereby authorized to submit the comments /reply in the Service Appeal No. 7258/2021

Title: Mst.Hanafia Bibi v/s Govt of Khyber Pakhtunkhwa through Secretary, Elementary &Secondary Education, Khyber Pakhtun khwa Peshawar On behalf of the undersigned.

  
Secretary,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
**(Respondent No.1)**

  
Director,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
**(Respondent No.2)**

  
District Education Officer (F)  
District Dir Lower  
**(Respondent No.3)**  


بعدالت جناب سروس ٹریبونل صوبہ خیبر پختونخواہ پشاور کیمپ کورٹ بمقام سوات

مسماة حنیفہ بی بی      بنام      حکومت KP وغیرہ

سروس آپیل

درخواست بمراہ منسوخی یکطرفہ کارروائی محررہ 15-09-2021

جناب عالی! درخواست حسب ذیل عرض ہے۔

- 1- یہ کہ مقدمہ عنوان بالا عدالت حضور میں زیر سماعت ہے جس آئندہ تاریخ پیشی مورخہ مقرر ہے۔
- 2- یہ کہ مقدمہ عنوان بالا کے نسبت سمن سائلہ / ریسپانڈنٹ نمبر 4 مورخہ 18-09-2021 کو موصول ہوئی اور جب سائلہ عدالت حضور میں بذریعہ مختار خاص حاضر ہوئی تو معلوم ہوا کہ سائلہ کے خلاف یکطرفہ کارروائی عمل میں لائی گئی ہے۔
- 3- یہ کہ سمن سائلہ مذکورہ مقدمہ میں بذمرہ ریسپانڈنٹ نمبر 4 فریق ہوں اور سمن سائلہ کی غیر حاضری قصداً عمدانہ ہے۔
- 4- یہ کہ انصاف اور قانون کا تقاضا ہے کہ سائلہ کے خلاف یکطرفہ کارروائی کو منسوخ کی جائے۔

5۔ یہ کہ درخواست اندر میعاد ہے اور درخواست ہذا میں کوئی قانونی امر مانع نہ ہے۔

لہذا استدعا ہے کہ بمنظوری درخواست  
ہذا سائل کے خلاف منسوخی یکطرفہ کارروائی محررہ  
15-09-2021 منسوخ کرنے کا حکم صادر  
فرمایا جائے۔

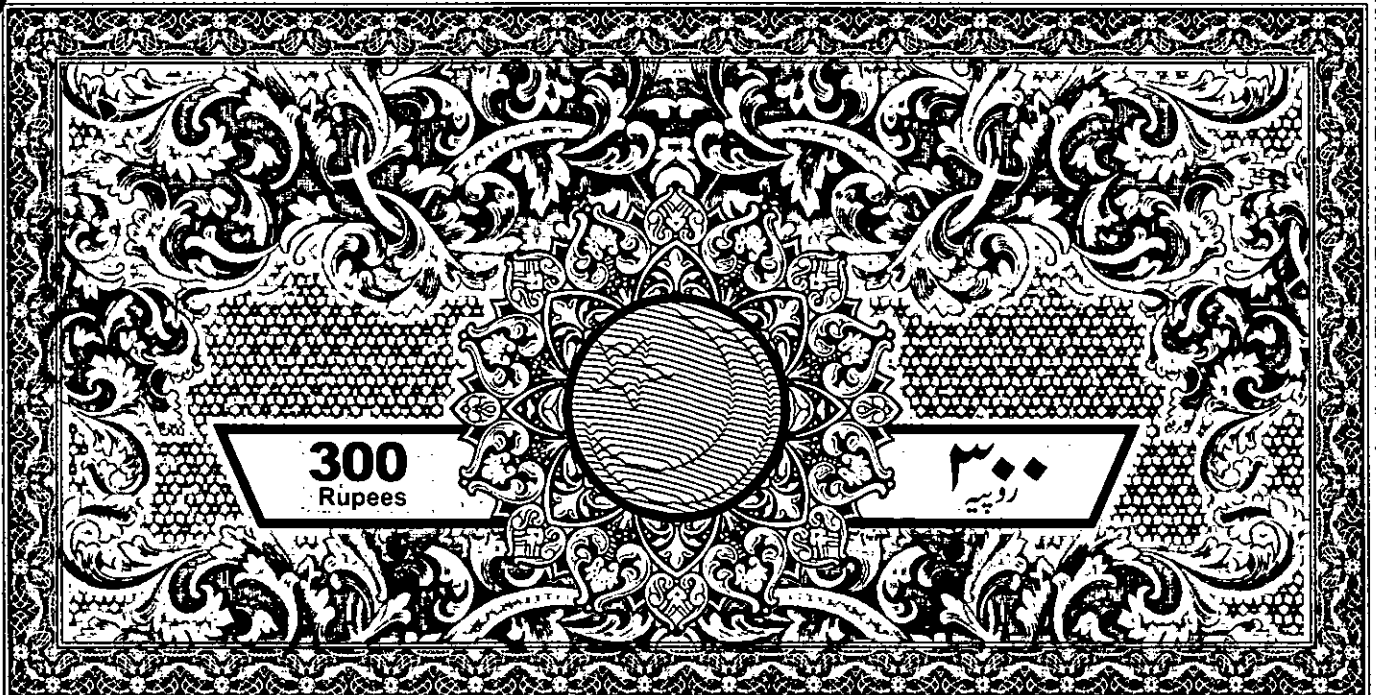
تصدیق

عریض  
سائلہ/ریسپانڈنٹ نمبر 4 بذریعہ مختار خاص

تصدیق کیا جاتا ہے کہ جملہ مراتب درخواست  
تا حد علم و یقین میرے درست و صحیح ہے۔ اور  
کوئی امر عدالت حضور سے مخفی یا پوشیدہ نہیں رکھا گیا۔

العبد  
محمد امجد

سائلہ/ریسپانڈنٹ نمبر 4 بذریعہ مختار خاص



300  
Rupees

۳۰۰  
روپیہ

بعدالت جناب خیبر پختونخواہ سروس ٹریڈیونل پشاور بمقام پشاور

مسماة حنیفہ بی بی بنام سرکار وغیرہ

دعویٰ استقرا حق وغیرہ

مختیار نامہ خاص بحق صدام حسین ولد شاہ زمین سکنہ خان سیرئی زیارت تالاش تحصیل تیرگرہ ضلع دیرپائین



منہ سماة الفت حنا زہبہ صدام حسین سکنہ خان سیرئی تحصیل تیرگرہ ضلع دیرپائین بروئے تحریر ہذا اقرار کر کے لکھ دیتی ہوں کہ ہم مقدمہ عنوان بالا میں اصالتاً بیروی مقدمہ سے بوجہ زانہ فردہ نشین عورت ذات ہونے سے قاصر ہوں اس لیے میں اپنی جانب سے مسی صدام حسین ولد شاہ زمین سکنہ خان سیرئی زیارت تالاش تحصیل تیرگرہ ضلع دیرپائین کو مختیار خاص مقرر کر کے ذیل اختیارات دیتی ہوں۔ کہ مختیار خاص میرے جانب سے بیروی مقدمہ کرے، کسی وکیل یا بریٹر مقرر کرے، بیان حلفی داخل کرے، درخواست یا جواب درخواست داخل کرے، جواب دعویٰ، و جواب درخواست داخل کرے گواہان طلب کرے، درخواست منسوخی کاروائی ایک طرفہ داخل کرے، رقم جمع کرے یا بذرائع رسید رقم وصول کرے۔ راضی نامہ کرے، بیان دے اپیل نگرانی، نظر ثانی یا تجویز ثانی داخل کرے عرضیکہ مقدمہ بالا میں مجھے جو جو اختیارات حاصل ہیں مختیار خاص کو تفویض کرتی ہوں کہ وہ میرے جانب سے جملہ کاروائی مقدمہ کرے تو مجھے قبول و منظور ہونگے لہذا مختیار نامہ خاص سنداً تحریر شد۔

مورخہ: 28-09-2021

بد

بد

15302-7258921-9

مسی صدام حسین

15302-3382989-8 سماة الفت حنا



**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**TRIBUNAL CAMP COURT AT SWAT**

Service appeal No. 7258/2021

Mst. Hanifa Bibi ..... (Petitioner)

VERSUS

Govt of KPK.....(Respondent)

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Respondent No.4

Through

  
**SYED ABDUL HAQ**

**Advocate Supreme Court**

**Cell No. 0311-0950959**

1

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**TRIBUNAL CAMP COURT AT SWAT**

Service appeal No. 7258/2021

Mst. Hanifa Bibi ..... (Petitioner)

VERSUS

Govt of KPK.....(Respondent)

**REPLY ON BEHALF OF RESPONDENT NO.4 NAMELY MST.**  
**ULFAT HINA**

**Respectfully sheweth;**

**Preliminary objections:**

1. That the appeal mentioned titled above is not maintainable furthermore the appellate concealed material facts from this Hon'ble tribunal so, the petition be dismissed with heavy cost.
2. That the instant replay may also be treated as application under 7 rule 11 CPC that the appellant having got no cause of action as the same is premature under the relevant rules/laws.

**FACTS:**

1. No comments.
2. In response of para No.2 the appellant was initially appointed on 28/03/2017 as PST and posted at GGPS Pato and after 3 days vide partial modification office

order dated 31/03/2017, the appellant was transferred to GGPS Nagri Bala. (Copy of the same two orders are available on page No. 11 and 12 of the service appeal). Furthermore the appellant was transferred from GGPS Nagri Bala to GGPS Nasafa Talash vide officer order dated 09/04/2020. **(Copy of the said order enclosed annexure "A")** but the appellant intentionally not brought the same order before this Hon'ble tribunal.

3. In response of para No.3 the official respondents sought online application qua transfer and the appellant as well as the respondent No.4 submitted their claim via E-transfer application form **(Copy of the both the application are attached)** it is also to mention here the appellant concealed her real appointment order and shows/written in the E-Transfer application form as 01/04/2016, however the same was scrutinize by the competent authority and declared her tenure as immature. It is to be noted that in pursuance of the said fake/wrong entries mentioned by the appellant in the form she was allegedly benefited and transferred to GGPS Soghaly vide order dated 05/07/2021, the same order is available on page No. 14 of the appeal, that the respondent No.4 filed the departmental appeal on

07/07/2021 which was produced before the competent committee and the respondent No.4 was found fit and entitle for the transfer, resultantly respondent No.4 was transferred to GGPS Soghaly vide office order Endst No. 16049-51 dated 03/08/2021 (Copy of the order is available on page No. 15 of the appeal).

4. In response of para no.4 after scrutinizing the tenure of appellant as the respondent No.4 the competent authority rightly withdraw the order of appellant vide office order Ends No. 16052-54 dated 03/08/2021 (the same order is available on page No. 16 of the appeal).

5. In response of para No.5, the appellant never discriminated but she concealed the material facts from the concerned authority and committed a misconduct so, on this score alone not only the appeal is incompetent but she is answerable before the competent authority as well as this Hon'ble tribunal.

6. In response of para no.6 the appellant filed a writ petition bearing No. 3118-P/2021 which was dismissed by the Hon'ble Peshawar High Court vide order dated 09/08/2021. **(Copy of the writ petition**

4


**and order are attached)** and the appellant filed a departmental appeal on 05/08/2021 but without waiting for the fate of the departmental appeal and appellant filed service appeal No. 7258/2021 on 16/08/2021 which is not maintainable under Khyber Pakhtunkhwa service tribunal act 1974 vide section 4 of the act.

7. In response No.7 the husband of respondent No.4 is also a teacher and the respondent No.4 is entitled to be transfer after completing the required tenure period as mentioned in the regulatory act 2011.

**GROUNDS:**

That the averments mentioned above are sufficient for the alleged grounds taken by the appellant.

It is, therefore very humbly prayed that the appeal is not maintainable and be dismissed with cost.

Respondent No.4  
Through  


**SYED ABDUL HAQ**

**Advocate Supreme Court**

5

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**TRIBUNAL CAMP COURT AT SWAT**

Service appeal No. 7258/2021

Mst. Hanifa Bibi ..... (Petitioner)

VERSUS

Govt of KPK.....(Respondent)

**AFFIDAVIT**

**I, Saddam Hussain S/o Shah Zamin R/o Khan Serai, Ziarat Talahs, Tehsil Timergara, District Dir Lower, (special attorney for the respondent No.4), do hereby the solemnly affirm and declares that the contents of this **reply** are true and correct to the best of my knowledge and belief and nothing has been kept concealed.**

*DEPONENT*



**SADDAM HUSSAIN**

**CNIC: 15302-7258921-9**



ANNEXURE

6

OFFICE OF THE DISTRICT EDUCATION OFFICER (Female) DIR PAYAN

eTransfer ID: 09042020123940

OFFICE ORDER

Consequent upon the approval of the competent authority the following teachers are hereby transferred/adjusted against the vacant Posts mentioned against their names in the interest of public service with immediate effect.

S.No	Name	Designation	From	Transferred To
1	ASMA GUL	A.T.	GGMS DAROO MAIDAN	GGMS MAYAR KHADAGZAI
2	NUSRAT MUHAMMAD	A.T.	GGHS DAG GOSAM	GGHS MALAKAND (P)
3	SABIHA BIBI	A.T.	GGMS DALGRAM	GGHS BIYARAI
4	NAJMUNNESA	A.T.	GGMS KANDO MACHLA	GGHS NARI TANGI
5	NAILA BIBI	C.T.	GGMS BAMBOLAI	GGMS ADAM DHERAI
6	JAMORIA BEGUM	C.T.	GGHS BIYARAI	GGHS MORANAI
7	NAYAB SHUAIB	C.T.	GGMS SHALPALAM	GGHS KHALL COLONY
8	UZLEEFAT	C.T.	GGMS MATOOR	GGMS TEKNAI PAYEEN
9	PARVEEN BEGUM	C.T.	GGMS DARMAL BALA	GGHS JANGO
10	NABILA	C.T.	GGMS SAFARY MAIDAN	GGHS KOHERAY
11	SIDRA	C.T.	GGMS TEKNI BALA	GGHS DARA RAMORA
12	SANA GUL	C.T.	GGHS NARI TANGI	GGMS ASSIGI
13	KALSOOM	C.T.	GGMS GUMBAT BANDA	GGMS MARKHANAI
14	SHAHNEELA	C.T.	GGMS TERONA KHADAGZAI	GGHSS KHADAGZAI
15	UZMA LASANI	C.T.	GGHS KHAN ABAD (DUKRAI)	GGHS BAGH KANDAI
16	SAIMA HUSSAIN	D.M.	GGHS INZARO	GGHSS KHADAGZAI
17	MUFIDA	P.E.T.	GGHS BAGH KANDAI	GGMS MAYAR KHADAGZAI
18	SALMA ALI	P.E.T.	GGMS DARMAL BALA	GGHS SHATAI
19	SABINA BIBI	P.E.T.	GGMS DARMAL PAYEEN	GGHS KOHERAY
20	KASHRA BEGUM	P.E.T.	GGMS SANGOLAI PAYEEN	GGHS TAWDA CHINA
21	GULFAM	P.E.T.	GGMS SAFARY MAIDAN	GGHS TIMERGARA
22	FUZIA TABASSUM	PSHT	GGPS MANDEZO	GGPS GOSAM GHANAM SHAH
23	ZAMAROOD BEGUM	PSHT	GGPS PASHATAI	GGPS MUNDA NO.1

Approved  
to be true copy

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	SHAQAT BEGUM	PST	GGPS BANDAGAI MUNJAI	GGPS JABAGAI BALAMBAT
	NAEEMA BIBI	PST	GGPS RAIDGAI	GGPS GALL GOOT
26	SHABNAM BEGUM	PST	GGPS SHADAS	GGPS GALL GOOT
27	NAHEEDA	PST	GGPS CHEKHO	GGPS MATTA ASLAM ABAD
28	ULFAT JABEEN	PST	GGPS SHEKHAN MAYAR	GGPS DANDO SHAH
29	HUMIRA NAZ	PST	GGPS MANZ BANDA	GGPS MIRZA ABAD
30	HANIFA BIBI	PST	GGPS NAGRI BALA	GGPS NASAFA TALASH
31	SHARAFAT SULTAN	PST	GGPS SAFROONA	GGPS OUCH BANR
32	NAILA BIBI	PST	GGPS ASIGI NO.2	GGPS RABAT NO.2
33	SHABNAM	PST	GGPS OSAKAI	GGPS SARAI BALA
34	HALEEMA GUL	PST	GGPS BARAM KAY	GGPS SHERA MKD
35	FARYAL JABEEN	PST	GGPS BOCHAKAY	GGPS TALAI SIA
36	ULFAT HINA	PST	GGPS GERO TANGAI	GGPS ZIRAT TALASH
37	SEEMA GUL	PST	GGPS SHAL KANDAI	GGPS KHADI KHELA
38	SAPNA SETARA	PST	GGPS LALO	GGPS LACHA MAIDAN
39	NIZAKAT BEGAM	PST	GGPS GORO TALASH	GGPS GUMBAT TALASI
40	MEHNAZ AZAM	Senior C.T.	GGHS OSAKAI	GGHSS OUCH
41	NAEEM-UN-NISA	SST (General)	GGHS NAMAZ KOT	GGHSS OUCH
42	WALAYAT	SST (General)	GGHS INZARO	GGHS KHADAGZAI
43	MARYAM BIBI	SST (General)	GGMS MASKINI	GGMS KHALL
44	MARIA NABI	SST (IT)	GGHSS MUNJAI	GGHS THRAI
45	ABIDA PARVEEN	T.T.	GGHS MORANAI	GGHS MALAKAND (P)

*[Signature]*  
 District Education Officer (F),  
 DIR PAYAN

Endst. No. 5982-6033

Dated: 09/4/2020

Copy of the above is forwarded to:

1. District Accounts Officer Concerned
2. Principal/Head Master/Mistress Concerned.
3. Official Concerned.
4. B & AO local office.
5. Cashier/Accountant Local Office.
6. Master File.

*[Signature]*  
 Deputy District Education Officer (F)

*[Signature]*  
 A. J. Steo



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### Charge Report

Conquest upon order issued by distric education officer (Female) Dir Lower at Timergara Endst No: 5982-6033 Dated: 09/04/2020 at Timergara Hanifa

Bibi PST Took over Charge of my duties this day: 10/04/2020 as PST at GGPS Nasafa Talash.

#### OFFICE OF THE HEADMISTRESS GGPS NASAFA TALASH DIR LOWER

No: \_\_\_\_\_

Dated: 10/04/2020


Copy of the above is forwarded to

- 1) DEO (F) Dir Lower
- 2) Distric account officer Dir Lower

HEAD MISTRESS

GGPS

Nasafa Talash

  
**Attested**  
to be true copy

**E-Transfer Application Form  
Elementary & Secondary Education Department  
Government of Khyber Pakhtunkhwa**

Application

9  
ASDEO  
signature  
28/6/2021

**Personal Information**

1. Name	<u>Hanifa Eibi</u>	2. Father/Husband	<u>Hussain ul haq</u>
3. CNIC	<u>1530256445822</u>	4. Personal No	<u>00865885</u>
5. Date of Birth	<u>10/03/1994</u>		
6. Highest Academic Qualification			
a. Level	<u>BA/BSc</u>	b. Major Subjects	<u>bio chemistry</u>
7. Gender	<u>Female</u>	8. Marital Status	<u>Married</u>
a. If married, then please mention whether your spouse is also a Government Servant(Yes/No)		<u>Yes</u>	
b. If Yes, Then please mention Designation, Department, Place & District of posting of your spouse.			
i. Designation	<u>QARI BPS 12</u>	ii. Department	<u>Education Department</u>
iii. Place	<u>GHS DHERAI (UC BANDAGAI)</u>	iv. District of Posting	<u>DIR PAYAN</u>
9. Email Address	<u>haniffabibi1122@gmail.com</u>	10. Mobile No.	<u>03499257395</u>
1. District of Domicile	<u>DIR PAYAN</u>	12. Tehsil	<u>TIMERGARA</u>
3. Union Council	<u>BANDAGAI</u>		
4. Postal Address	<u>village chino talash Union council bandagai plo saraye payeen</u>		

**B. Service History**

Are you appointed on contract/adhoc basis?	No		
1. Date of 1st Appointment in Education Department(dd/mm/yyyy)	<u>01/04/2016</u>		
2. Designation of 1st Appointment in Education Department			
3. Present Posting			
i. Designation	<u>PST</u>	ii. BPS	<u>12</u>
iv. School Name	<u>GGPS NASAFI TALASH</u>	iv. School Level	<u>Primary</u>
v. School District	<u>DIR PAYAN</u>	vi. School Tehsil	<u>TIMERGARA</u>
ii. School UC	<u>NOORA KHEL</u>		
i. Present Posting against the present Designation in the School since	<u>01/04/2016</u>		
ii. Present posting in the school since	<u>01/04/2016</u>		

**C. Scoring Indicators**

1. Total tenure in the present school:	<u>5.24 years</u>
2. Priorities	
a. 1st Priority School	<u>15643-GGPS SOGHALAI</u>

*Since, her total tenure in the present school is immature.*  
 Muhammad Inamullah  
 ASDEO (FEMALE)  
 GHS NASAFI TALASH DIR PAYAN

*Miss Hanifa Eibi has been appointed as PST on adhoc/Temp basis in the edu: dept on 28/03/2017 & took over charge on 01/04/2017 at GGPS Nagsi (B) & remained/worked there till 29/4/2020 then took over charge on 29/4/2020 at GGPS Nisafan*

Attestation  
to be true copy - 4-20

**E-Transfer Application Form  
Elementary & Secondary Education Department  
Government of Khyber Pakhtunkhwa**

Application No. 9637

10

**Personal Information**

Name	<u>ULFAT HINA</u>	2. Father/Husband	<u>Shafi Ul Haq</u>
CNIC	<u>1530233829898</u>	4. Personal No	<u>00868556</u>
Date of Birth	<u>17/10/1995</u>		
Highest Academic Qualification			
a. Level	<u>BA/ESc</u>	b. Major Subjects	<u>science</u>
Gender	<u>Female</u>	8. Marital Status	<u>Married</u>
a. If married, then please mention whether your spouse is also a Government Servant(Yes/No)			<u>No</u>
b. If Yes, Then please mention Designation, Department, Place & District of posting of your spouse.			
i. Designation		ii. Department	
iii. Place		iv. District of Posting	
9. Email Address	<u>nil</u>	10. Mobile No.	<u>0340930879</u>
1. District of Domicile	<u>DIR PAYAN</u>	12. Tehsil	<u>TIMERGARA</u>
3. Union Council	<u>SHAHI KHELL</u>		
4. Postal Address	<u>khan seri ziarat talash tehsil timeraga dir lower kpk</u>		

*c/s ASD ED signature*  
[Signature]  
28/06/2021

**B. Service History**

Are you appointed on contract/adhoc basis? No

1. Date of 1st Appointment in Education Department(dd/mm/yyyy) 01/03/2019 *28/03/2017*

2. Designation of 1st Appointment in Education Department

3. Present Posting

i. Designation	<u>PST</u>	ii. BPS	<u>12</u>
iv. School Name	<u>GGPS GERO TANGAI</u>	iv. School Level	<u>Primary</u>
v. School District	<u>DIR PAYAN</u>	vi. School Tehsil	<u>TIMERGARA</u>
iii. School UC	<u>SHAHI KHELL</u>		

4. Present Posting against the present Designation in the School since 01/03/2019 *28/03/2017*

5. Present posting in the school since 01/03/2019 *28/03/2017*

**C. Scoring Indicators**

6. Total tenure in the present school: 2.32 years

7. Priorities

a. 1st Priority School	<u>15643-GGPS SOGHALAI</u>
b. 2nd Priority School	

**Adjusted to be true copy**

*As per office record (S/Book) Miss Ulfat Hina PST has been appointed in the edu. dept. on 28/03/2017 while taking over charge on 01/04/2017 at GGPS Gero Tangai. Hence, her total tenure in the present school is 04 years 03 months & 28 days up to date 28/06/2021*

*M. Muhammad Inamullah  
ASD ED (MALE)  
GHEZIRI TALASH DIR (W)  
28/06/2021*

# ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ بمقام تیرگرہ ضلع دیرلوئر

مسماة الفت حینا (PST) ولد شفیع الحق ساکن خان سیرئی زیارت تالاش تحصیل تیرگرہ ضلع دیرلوئر (سائیلہ / اپیلانٹ)

بنام

مسماة حنیفہ بی بی (PST) زوجہ جوہر علی ساکن چینو تالاش تحصیل تیرگرہ ضلع دیرلوئر (ریسپانڈنٹ)

اپیل برخلاف حکم و محرمہ 05/07/2021 مسماة حنیفہ بی بی PST بوجوہات ذیل

اپیل

جناب عالیہ!

سائیلہ / اپیلانٹ حسب ذیل عرض رساں ہے۔

یہ کہ من سائیلہ / اپیلانٹ بحیثیت PST گورنمنٹ گرلز پرائمری سکول GGPS گیروتنگے تحصیل تیرگرہ میں ڈیوٹی سرانجام دے رہی ہے۔

یہ کہ من سائیلہ کہ سکول مذکورہ بالا میں قانونی ٹائم برائے عرصہ دو سال مکمل ہوئی ہے۔ اور سائیلہ تقریباً پانچ سال سے سکول مذکورہ میں ڈیوٹی دے رہی ہے۔

یہ کہ من سائیلہ / اپیلانٹ نے سکول مذکورہ بالا سے ٹرانسفر کرنے کی درخواست یعنی سکول گورنمنٹ گرلز پرائمری سکول گیروتنگے سے GGPS سوغالے تالاش کیلئے درخواست دی ہے۔

یہ کہ مسماة حنیفہ بی بی PST کا عرصہ اوقت ٹائم دو سال برائے ای ٹرانسفر GGPS نا صافہ میں پورا نہیں ہوئی ہے۔

یہ کہ اسکے علاوہ مسماة حنیفہ بی بی PST نے GGPS نا صافہ سے بھی GGPS سوغالے کیلئے درخواست غیر قانونی طور پر دی ہے۔ جو کہ (E ٹرانسفر) رولز ریگولیشن کے نمبر xii کے خلاف وغیر قانونی طور پر دی ہے۔

یہ کہ اسکے علاوہ سپاؤس پالیسی کے مطابق بھی سائیلہ قانونی حقدارہ ہے۔ کیونکہ سائیلہ کے اپیلانٹ کی شوہر مسی صدام حسین PST بھی GGPS سوغالے میں ڈیوٹی سرانجام دے رہا ہے

یہ کہ ریسپانڈنٹ مسماة حنیفہ PST نے (ای ٹرانسفر فارم میں فراڈ اور دھوکہ کر کے یعنی فارم مذکورہ نے میں قصداً غلط اندراج کر کے اور اپیلانٹ کے قانونی حقوق سے محروم کی ہے۔ ریسپانڈنٹ کی (ای ٹرانسفر فارم میں A SDO اور SDO صاحبان نے ان غلطیوں کی نشاندہی کر کے اور اسکے بعد درنگی کی ہے نقولات لف ہیں۔

*Arrested to be true com*

یہ کہ بدیں وجہ من سائیکلہ / اپیلانٹ مسماة حنیفہ بی بی PST کہ آرڈر ٹرانسفر محررہ  
05/07/2021 کے خلاف آپ صاحبان کو اپیل کی جاتی ہے کہ آپ صاحبان مذکورہ بالا غیر قانونی  
ٹرانسفر منسوخ کر کے / کینسل کر کے اسکی بجائے سائیکلہ / اپیلانٹ کے ٹرانسفر کی درخواست  
منظور کر کے اور اپیلانٹ کو GGPS گیر دے GGPS سوغالے کو تبدیل کرنے  
احکامات صادر فرمادیں۔

یہ کہ اس میں کوئی قانونی امر مانع نہ ہے بلکہ قانونی اور قرین انصاف ہے۔

مورخہ 07/07/2021

بحالات بالا استدعا ہے کہ من اپیلانٹ کے اپیل  
ہذکو منظور کرنے کے احکامات صادر فرمادیں۔

الحمد لله  
حماة الفتحة حمينا

Copies Forwarded to

- i) Dupty commissioner District Dir Lower
- ii) Direcoter Elemantary & Secondary Education Kpk
- iii) Anti corruption Department Dist Dir lower

Attached  
to be true copy



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MINUTES OF THE MEETING OF E-TRANSFER CASES OF PST/ CT/DM/AT/TT/ & CARIA POSTS.

On 17<sup>th</sup> July 2021, a meeting was held under the chairmanship of Deputy DEC(F) Mst:Shaheen Begum Lower Dir. The following members of the redressal committee attended the meeting.

SNo	Name & Designation	
1	Shaheen Begum Dy:DEO(F) Lower Dir	Chairperson
2	Shabnam BIBi SDEO(F) Adenzai	Member
3	M.Inamullash ASDEO Talash Circle	Member
4	Muhammad Haroon ASDEO Khall circle	Member
5	Jan Bakht Said Assistant DEO(F)office	Member
6	Akbar Muhammad Senior Clerk/Dealing Assistant	D/Asstt:

The meeting was formerly started with the recitation from the Holy Quran, Afterwards the appeals regarding E-Transfer cases were thoroughly discussed with the detail as Given below:

S#	S# in E/Transfer order	Name of Candidate	Desig	Present School	School Applied to	Nature of Appeal	Decision taken by the redressal committee/remarks
1		Zainab Begum	DM	GGHS Shalkandai	GGMS Khema	Appeal lodged against the decision made as E Transfer i.e. Uzma Sundas S.No.12	After revisiting the case from the relevant record, both the teachers have secured the same score which needs, further guidance from the Director E&SE KPK Peshawar.
2	38	Hanifa Bibi	PST	GGPS Nasafa	GGPS Soghalai		Tenure immature on the present school i.e 10-4-2020 to 5/7/2021 (one year 2 months 25 days) instead of 1-4-2016
3		Ulfat Hina	PST	GGPS Giro Tangai	GGPS Soghalai	Appeal lodged against the decision made as E Transfer i.e. Hanifa Bibi S.No.38	Mst:Ulfat Hina was appointed on 28-3-2017 and took over her charge at GGPS Gero Tangai on 1-4-2017 & her Total tenure becoming 04 years 03 months and 28 days, Hence she is recommended for transfer to GGPS Soghalay Talash
4		Sama Gul	PST	GGPS Serai Kityari	GGCM Shawa	Appeal regarding E-transfer	The application is rejected as Sania Bibi has the advantage of securing 10 marks over seema Gul, Hence Samia Bibi stands eligible and her transfer under E-Policy is genuine and according to the merit


**Attested**  
to be true copy



14

		Yasmin Begum	SPST	GGPS Khair Abbad	GGPS Chakdara	Appeal regarding E-transfer	Rejected with the remarks that the applicant has not applied under E-Transfer online system while just submitting her application to the SDEO (F) office manually
6	35	Neelam Bibi	PST	GGPS Safrona Ouch	GGPS Ouch Qilla	Appeal regarding E-transfer	In light of per application, the teacher concerned, applied for E-Transfer to. GGPS Jangzai and GGPS Qilla Ouch ,According to the 1st Priority , the teacher may be transferred to GGPS Jangzai instead of GGPS Ouch Qilla.

1	Shaheen Begum Dy:DEO(F) Lower Dir	Chairperson	Signature
2	Shabnam BIBi SDEO(F) Adenzai	Member	
3	M.Inamullash ASDEO Talash Circle	Member	
4	Muhammad Haroon ASDEO Khall circle	Member	
5	Jan Bakht Said Assistant DEO(F)office	Member	
6	Akbar Muhammad Senior Clerk/Dealing Assistant	D/Asstt:	

Approved.  
  
 DISTRICT EDUCATION OFFICER  
 (F) DIR LOWER

Attested  
 to be true copy

National Identity Card

ARIA POSTS:

15



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA



0945-9250083

DEO FEMALE DIR LOWER

emisdofemaledirlower@unicon

NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT TEHSIL TIMERGARA DISTRICT DIR  
LOWER.

**OFFICE ORDER**

Consequent upon the recommendation of the appellant committee Mst Ulfat Hina PST GGPS GeroTangi District Dir Lower is hereby transfer to GGPS Soghalai against vacant post in the interest of public service with immediate effect.

(ASMAT ARA QURESHI)  
DISTRICT EDUCATION OFFICE  
(FEMALE) DIR LOWER AT T/GARA.

Endst: No. 16049-51

Dated Timergara the: 3 / 08 / 2021

Copy of the above is forwarded to:-

1. The Director E&SE KPK Peshawar.
2. The District Account Officer Dir Lower.
3. The SDEO (F) Concerned Dir Lower.
4. Office Record.

DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA

Attested  
to be true copy



16



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA



0945-9250083

DEO FEMALE DIR LOWER

Timergara, Peshawar, Khyber Pakhtunkhwa

NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT TEHSIL, TIMERGARA DISTRICT DIR  
LOWER.

OFFICE ORDER

Consequent upon the recommendation of the appellant committee transfer order issued vide this office Endst: No 15738-61 dated 05-07-2021 at serial no 38 in respect of Hanifa Bibi PST GGPS Nasafa to GGPS Soghatal Dir Lower as hereby with drawn in the interest of public service with immediate effect.

(ASMAT ARA QURESHI)  
DISTRICT EDUCATION OFFICE  
(FEMALE) DIR LOWER AT T/GARA.

Endst: No. 16052-541

Dated Timergara the: 03/08/2021

Copy of the above is forwarded to:-

1. The Director E&SE KPK Peshawar.
2. The District Account Officer Dir Lower.
3. The SDEO (F) Concerned Dir Lower.
4. Office Record.

*Asmat Ara Qureshi*  
DISTRICT EDUCATION OFFICER (F)  
DIR LOWER AT TIMERGARA

*Asmat Ara Qureshi*  
Accepted  
to be true copy



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the June 10, 2021

17

NOTIFICATION

No.SO(SM) E&SED/7-1/2020/PT/General: In order to facilitate the Teaching Cadre Employees and to Streamline and standardized/ automate the Process of posting / transfer, the Competent Authority is pleased to approve the E-Posting/Transfer policy for the Employees of the Teaching Cadre (BS-12 to BS-18) of E&SE Department Khyber Pakhtunkhwa with immediate effect, in the best public interest.

E-TRANSFER POLICY OF TEACHING CADRE (BS-12 to 18) IN E&SE DEPARTMENT  
KHYBER PAKHTUNKHWA

*[Handwritten signature]*

- i. The introduction of e-Transfer policy for Teaching Cadre shall supersede all previous e-posting/transfer policies in the E&SE Department.
- ii. This policy covers transfers related to Intra district transfers of district cadre post and inter district transfers of Provincial cadre posts.
- iii. Transfers on Complaint (Administrative Ground), Mutual basis, Inter district and transfer for Operationalization of Newly Established schools, newly created posts will be exempted from the present policy.
- iv. Transfers shall be made at least once a year, preferably at the end of academic year.
- v. The vacant positions will be uploaded by the District Education Officers for all teaching cadres (BS-12 to BS-18).
- vi. The Education Monitoring Authority will provide requisite data as per format provided by the Director EMIS.
- vii. Each Competent Authority shall visit the Dashboard of e-Transfer app, check and verify all the particulars of the applicants.
- viii. The teachers appointed on Contract/Adhoc basis shall remain non transferable until regularized.
- ix. The Teachers in Schools having 2-teachers are not allowed in the e-transfer policy for transfer.
- x. Inter district transfer against senior positions (100% District promotion Quota) i.e. SCT, SDM, SPET, SAT, STT, S-Qari, SPST and PSHT are not allowed neither manually nor through e-transfer.
- xi. Transfer shall be made only against the vacant posts.
- xii. Teachers bearing Minimum tenure of two years on the present post in the present school will be eligible for e-posting/transfer.
- xiii. In case of same score of two or more candidates, merit will be 1<sup>st</sup> on Seniority, then by Date of Birth and if there is tie, then on first come first get basis.
- xiv. Subsequently Transfer orders generated by e-Transfer App will be issued.
- xv. Each Competent Authority shall constitute a Grievance Redressal Cell headed by a BPS-18 or above officer which will resolve the grievances and determine the merit position of the applicants within a week positively.

2. The indicators as per Form (A, B, C & D) will be considered for posting/transfer as per detail given below:

Form-A: Posting/Transfer of Teachers up to BPS 16 except SST (Total marks 65)

- i. Distance of present school to the desired school (in KM) – 20 marks
  - a. Within 5 KM – 0 marks
  - b. Within 10 KM – 5 marks
  - c. Within 15 KM – 10 marks
  - d. Within 20 KM – 15 marks
  - e. Greater than 20 KM – 20 marks

*Accepted*  
*by the authority*

(18)

**PESHAWAR HIGH COURT PESHAWAR**  
**Form "A"**

**Order Sheet**

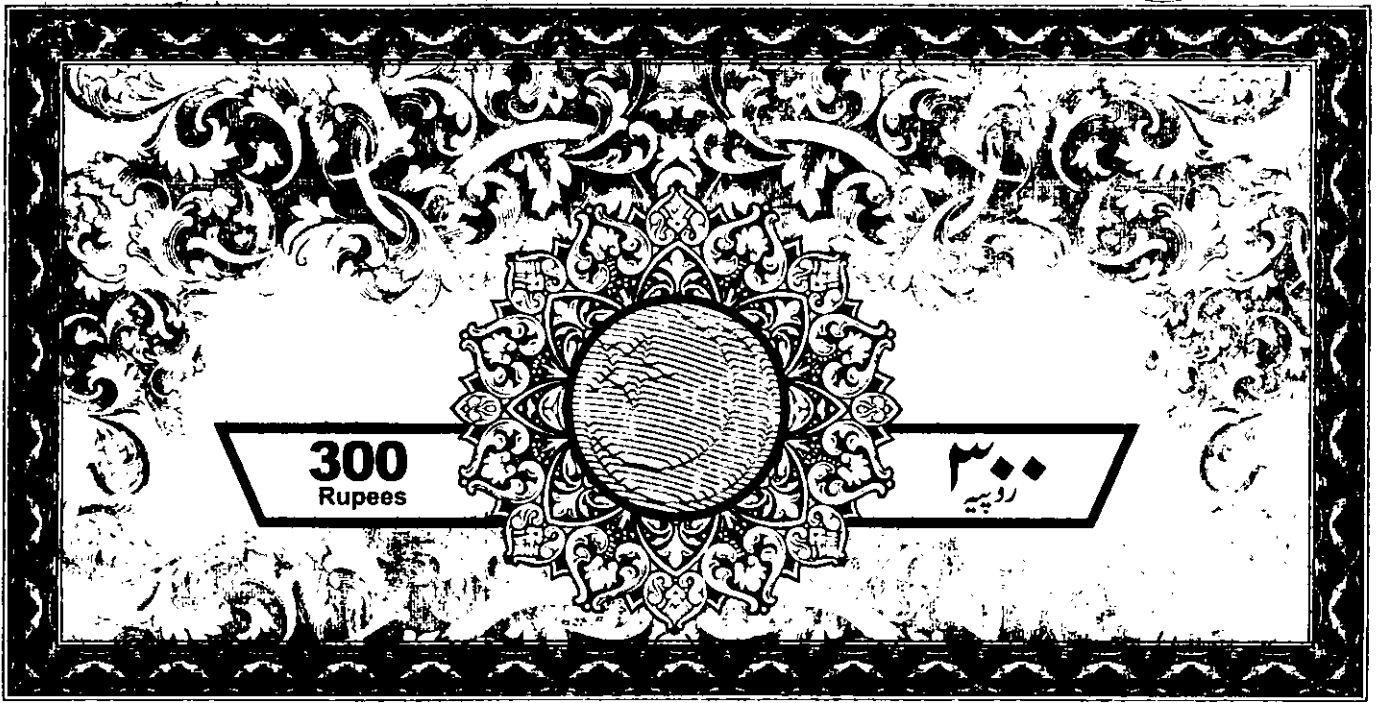
Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2	3
09.8.2021	<p><b><u>WP 3318-P/2021 with IR.</u></b></p> <p>Present:</p> <p style="text-align: center;">Mr. Daris Khan, Advocate, for the petitioner.</p> <p style="text-align: center;">*****</p> <p><b><u>S M ATTIQUE SHAH, J: -</u></b> After arguing the case at some length, learned counsel for the petitioner stated at the bar that the petitioner would not press the instant petition provided a direction is issued to the respondent No.2 for expeditious disposal of the appeal pending before him.</p> <p>2. In view of the above, instant petition is dismissed with direction to the respondent No.2 to expeditiously decide the pending appeal of the petitioner.</p> <p><b><u>Announced:</u></b> 09.8.2021</p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p>

\*Nazir\*

(D.B)

Hon'ble Mr. Justice S M Attique Shah, J  
Hon'ble Mr. Justice Wiqar Ahmad, J

Accepted  
to be true copy



بعدالت جناب خیبر پختونخواہ سروس ٹریبونل پشاور بمقام پشاور

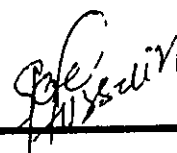
مسماة حنیفہ بی بی بنام سرکار وغیرہ

دعوئی استقرا حق وغیرہ


مختیار نامہ خاص بحق صدام حسین ولد شاہ زمین سکنہ خان سیرنی زیارت تالاش تحصیل تیرگرہ ضلع دیرپاکین

مسماة حنیفہ بی بی زوجہ صدام حسین سکنہ خان سیرنی تحصیل تیرگرہ ضلع دیرپاکین بروئے تحریر ہذا اقرار کر کے لکھ دیتی ہوں کہ ہم مقدمہ عنوان بالا میں اصالتاً بیروی مقدمہ سے بوجہ زنانہ فردہ نشین عورت ذات ہونے سے قاصر ہوں اس لیے میں اپنی جانب سے سبھی صدام حسین ولد شاہ زمین سکنہ خان سیرنی زیارت تالاش تحصیل تیرگرہ ضلع دیرپاکین کو مختیار خاص مقرر کر کے ذیل اختیارات دیتی ہوں۔ کہ مختیار خاص میرے جانب سے بیروی مقدمہ کے کسی وکیل یا بریٹر مقرر کرے، بیان حلفی داخل کرے، درخواست یا جواب درخواست داخل کرے، جواب دعوئی، و جواب درخواست داخل کرے گواہان طلب کرے، درخواست منسوخی کاروائی ایک طرفہ داخل کرے، رقم جمع کرے یا بذریعہ رسید رقم وصول کرے۔ راضی نامہ کرے، بیان دست اچیلنگ کرانی، نظر ثانی یا تجویز ثانی داخل کرے عرضیکہ مقدمہ بالا میں مجھے جو جو اختیارات حاصل ہیں مختیار نامہ سے وصول کرتی ہوں کہ وہ میرے جانب سے جملہ کاروائی مقدمہ کے تو مجھے قبول و منظور ہونگے لہذا مختیار نامہ خاص سنداً تحریر شد۔

مورخہ: 28-09-2021

بد  الع

15302-7258921-9 مسی صدام حسین

بد  الع

15302-3382989-8 مسماة الفت حنا

قیمت ایک روپیہ	کورٹ فیس
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مورخہ  
مقدمہ  
دعویٰ  
ہجوم

۲۰۲۱ منجانب  
رہنما ٹرسٹ  
ہنام حکومت

سماں حنیفہ بی

سوسائٹی / اسٹریٹ / 7258

### باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنے طرف سے واسطے پیروی و جواب دی و کل کارروائی متعلقہ آن  
مقام سروس ٹرسٹوں کے ورکسنگ کورٹ منسٹر کے سید عبدالحق ایسٹریٹ

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب

کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر

اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمدگی اور منسوخ دائر

کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کارروائی کے

واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ

بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ

التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی

اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ

مذکور لہذا وکالت نامہ لکھ دیا کہ سند ہے

۲۰۲۱

ماہ

م

المرقوم

العبد

گواہ شدہ

العبد

کے لئے منظور ہے

Attested and  
Accepted

بمقام