



**Service Appeal No. 1479/2019**

1. Mr. Abdul Saboor Khan, Advocate for the appellant present.  
Mr. Kabir Ullah Khattak, Additional Advocate General for respondents present. Arguments heard and record perused.

2. Vide our detailed judgement containing 05 pages, placed in connected Service Appeal No. 1400/2019 titled "Sharafat-un-Nisa Vs. Director Elementary & Secondary Education Peshawar and one other", we arrived at the conclusion that the appeal in hand is allowed and the case is remitted back to the department for denovo inquiry with the direction that the appellant should be associated in the inquiry. A detailed, self contained inquiry, fulfilling all codal formalities should be completed within sixty days of the receipt of this judgment. The appellants are reinstated in the service for the purpose of denovo inquiry. The issue of back benefits shall be subject to the final outcome of the denovo inquiry. The respondents shall intimate the date of receipt of judgement to the Registrar of this Tribunal and also the result of the inquiry. Parties are left to bear their own costs. Consign.

3. *Pronounced in open court in Abbotabad and given under our hands and seal of the Tribunal on this 22<sup>nd</sup> day of September, 2022.*

  
(FAREEHA PAUL)  
Member (E)  
(Camp Court Abbottabad)

  
(KALIM ARSHAD KHAN)  
Chairman  
(Camp Court Abbottabad)

22.12.2021

Learned counsel for the appellant present and stated that security and process fee have not been deposited due to having no knowledge of the same and in this respect, he submitted an application for allowing him to deposit the same. The application is placed on file in connected Service Appeal No. 1483/2019, which is accepted and the appellant is directed to deposit security and process fee within seven working days from today. After the requisite deposit, notices be issued to the respondents for submission of written reply/comments on 17.02.2022 before the S.B at Camp Court Abbottabad.

Appellant Deposited  
Security & Process Fee



(Salah-Ud-Din)  
Member (J)

Camp Court Abbottabad

21<sup>st</sup> July 2022 Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG and Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Shah Wali Ullah, Computer Operator for the respondents present.

Written reply on behalf of the respondents not submitted. Representative of the respondents seeks time to submit written reply/comments. Last chance is given to the respondents to submit written reply/comments within fifteen days in office, failing which their right for submission of written reply shall be deemed as struck of. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.

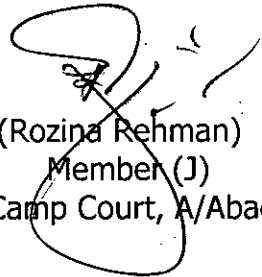


(Kalim Arshad Khan)  
Chairman

Camp Court Abbottabad

17.03.2021 Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on 13.07.2021 before S.B at Camp Court, Abbottabad.


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

13.07.2021 Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 13.10.2021.

Reader

13.10.2021 None is present on behalf of the appellant.

Security and process fee have not been deposited, therefore, notices could not be issued to the respondents. Notice be issued to the appellant/counsel to deposit the security and process fee within 07 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on next date positively, otherwise their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 22.12.2021 before the S.B at Camp Court, Abbottabad.

  
(Saif-ud-Din)  
Member (J)  
Camp Court, A/Abad

  
Chairman  
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.

Reader

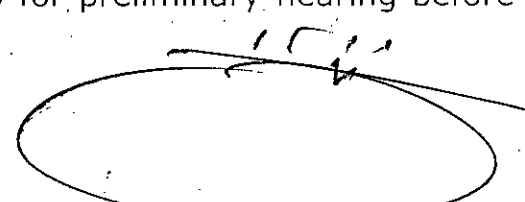
Due to summer vacation case to come up for the same on

18 19 20 at camp court abbottabad.

  
Reader

18.09.2020

Appellant has not forth come in person however, the clerk of the counsel did appear. According to him Mr. Abdul Saboor Khan learned counsel for the appellant has proceeded to District Kohistan for attending a case in the Model Court situated there, therefore, requested for adjournment. The appeal is adjourned to 14.12.2020 on which to come up for preliminary hearing before S.B at Camp Court, Abbottabad.

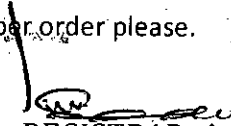

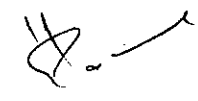
  
(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

Form- A

FORM OF ORDER SHEET

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

Case No.- 1479/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 04/11/2019                | <p>The appeal of Mst. Johajra Bibi received today by post through Mr. Abdul Saboor Khan 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;"><br/>REGISTRAR 4/11/19</p>   |
| 2-    | 24.01.2020                | <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-1-20</u></p> <p style="text-align: right;"><br/>CHAIRMAN</p> <p>Clerk to counsel for the appellant present and seeks adjournment on the ground that learned counsel for the appellant is not in attendance. Adjourn. To come up for preliminary hearing on 20.03.2020 before S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"><br/>Member<br/>Camp Court, A/Abad</p> |

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1479 of 2019

Mst. Johajra Bibi ..... **Appellant**

**VERSUS**

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

**APPEAL**

**INDEX**

| S# | Description of documents  | Annexure | Page# |
|----|---|----------|-------|
| 1. | Memo of Appeal  | -        | 1-6   |
| 2. | Affidavit   | -        | 7     |
| 3. | Correct address of Parties  | -        | 8     |
| 4. | Copy of appointment order dated 25.10.2005.                         | "A"      | 9     |
| 7. | Copy of impugned order dated 20.04.2019.                            | "B"      | 10-11 |
| 8. | Copies of Departmental appeal and impugned order dated. 08.10.2019. | "C&D"    | 12-13 |
| 9  | Wakalt Nama   | -        | 14    |

**Dated 29.10.2019**

جوہجرا بی بی  
JOHAJRA BIBI  
(Appellant)

Through:-

**ABDUL SABOOR KHAN**  
Advocate High Court

1

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No 1479 of 2019 <sup>Khyber Pakhtunkhwa</sup> Service Tribunal

Diary No. 1551

Dated 04-11-2019

Mst, Johajra Bibi, Ex-Primary School  
Teacher at Government Girls Primary  
School, Bar Bak, Tehsil Dassu, District  
Kohistan upper.....**Appellant**

**VERSUS**

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

.....**Respondents**

Filed to-day

Registrar.

4/11/19

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974**  
**AGAINST THE IMPUGNED ORDERS NO**  
**1198-1210 DATED 20.04.2019 AND**  
**6802 DATED 08.10.2019, PASSED BY**  
**RESPONDENTS WHEREBY MAJOR**  
**PENALTY OF REMOVAL FROM**  
**SERVICE OF APPELLANT ON THE**  
**GROUND OF ALLEGED UNSPECIFIED**  
**ABSENCE FROM DUTY WAS IMPOSED**  
**AND UPHELD.**

**PRAYER:-**

On acceptance of the instant service appeal, the impugned orders bearing No 1198-1210 dated 20.04.2019 and 6802 dated 08.10.2019, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Respectfully Sheweth:-**

1. That, appellant was appointed in a prescribed manner by competent authority against the post of Primary school Teacher vide appointment order dated 25.10.2005

**(Copy of appointment order dated 25.10.2005, is annexed as Annexure "A").**

2. That, all of a sudden, respondent No 02 without citing any reason and intimation straightaway, with a single stroke of pen imposed Major penalty of removal from service upon appellant w.e.f. 01.01.2019 on the ground of alleged unspecified absence from duty, vide impugned order No. 1198-1210 dated 20.04.2019.

**(copy of impugned order dated 20.04.2019 is annexed as Annexure "B").**



3. That, appellant filed a Departmental appeal on dated 15.05.2019, with respondent No 02, which was rejected vide impugned combined order no 6802 dated 08.10.2019. Which too was rejected without hearing the appellant.

**(Copies of Departmental appeal dated 15.05.2019 and impugned order dated. 08.10.2019 are annexed as Annexure "C&D" respectively).**

4. That, felling aggrieved from the impugned orders dated 20.04.2019 and 08.10.2019, appellant having no other remedy files the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

#### **GROUND:-**

- A) That, appellant never remained absent as alleged and the entire illegal proceedings were carried out fictitiously, while sitting in office by respondent No 02 out of mala-fide.
- B) That, before imposing the impugned penalty, no publication as required under rule 9 of E&D, Rules, 2011, was ever made in the leading newspapers, commonly available in the District of the appellant. The reference of news

papers publication in the impugned order are not commonly available in the area of the appellant, hence, the impugned order is wholly illegal, unlawful, without lawful authority and of having no legal effect.

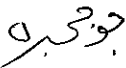
- C) That, no show cause notice was ever issued and the entire proceedings were fictitiously conducted by respondent No 02 at the back of the appellant.
- D) That, no inquiry into the alleged allegations was ever conducted and the impugned penalty was imposed without having the allegations proved.
- E) That, appellant was never confronted with the alleged allegations at any point of time, condemning her unheard.
- F) That, before passing the impugned order, appellant was not put on notice to present his view point/explanation under the Doctrine of **AUDI AULTEM PARTEM**, hence, the impugned order is not sustainable and maintainable under the law on this very sole ground.
- G) That, no evidence worth name was attempted to collect by respondent No 02 against the appellant for alleged absence from duty and he has been

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

**PRAYER:-**

On acceptance of the instant service appeal, the impugned orders bearing No 1198-1210 dated 20.04.2019 and 6802 dated 08.10.2019, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Dated 29.10.2019**

  
JOHAJRA BIBI  
(Appellant)

Through:-

  
**ABDUL SABOOR KHAN**  
**ADVOCATE HIGH COURT**

**VERIFICATION :**

I, Mst. Johajra Bibi , Ex-Primary School Teacher at Government Girls Primary School, Bar Bak, Tehsil Dassu, District Kohistan upper, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

  
JOHAJRA BIBI  
(DEPONENT)

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2019

Mst. Johajra Bibi ..... **Appellant**

**VERSUS**

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

**APPEAL**

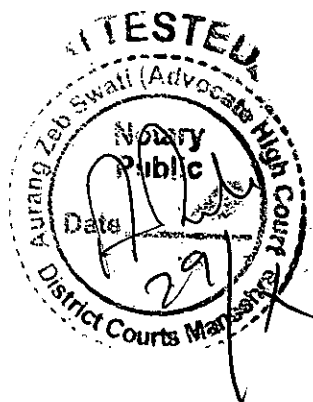
**AFFIDAVIT**

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

**Dated: 29.10.2019**

جوہرہ

JOHAJRA BIBI  
(DEPONENT)



**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2019

Mst. Johajra Bibi ..... **Appellant**

**VERSUS**

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

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

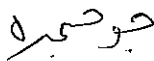
**APPELLANT:**

Mst, Johajra Bibi, Ex-Primary School Teacher at Government Girls Primary School, Bar Bak, Tehsil Dassu, District Kohistan upper.

**RESPONDENTS:**

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

**Dated 29.10.2019**

  
JOHAJRA BIBI  
(Appellant)

Through:-

  
**ABDUL SABOOR KHAN**  
Advocate High Court

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY KOHISTAN AT DASSU.**

Annexure - A

**APPOINTMENT ORDER**

Consequent upon the approval of Departmental Selection Committee the competent authority has been pleased to appoint the following (Female) Middle Ranked candidates of Tehsil Pattan, Pattan & Dassu (Union Council wise) against the vacant Posts of PTC in GPs-04 (No. 2345-100-0345) on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

| S.No | Name of candidate | Father's Name  | Residence/ U/C | Appli as | School where posted  | Remarks     |
|------|-------------------|----------------|----------------|----------|----------------------|-------------|
| 1    | Pauma Mustafa     | Mohd Mustafa   | Bar Bhrila     | PTC      | GGPB Saegdahnu       | Agmt V Post |
| 2    | Rukhshaha Begum   | Khan Wali      | Bar Bhrila     | PTC      | GGPB Dali Sharakot   | -do-        |
| 3    | Aalya Mustafa     | Mohd Mustafa   | Bar Bhrila     | PTC      | GGPB Banjar Yanlool  | -do-        |
| 4    | Baa Bari          | Khanzaman      | Kolai          | PTC      | GGPB Badar Kot Kolai | -do-        |
| 5    | Bibi Hajra        | Mera           | Kolai          | PTC      | GGPB Saegdahnu       | -do-        |
| 6    | Gul Bibi          | Khanzaman      | Kolai          | PTC      | GGPB Badar Kot Kolai | -do-        |
| 7    | Amlina Bibi       | Abdullah       | Kuz Para       | PTC      | GGPB Gulababad       | -do-        |
| 8    | Chand Bibi        | Gul Zareen     | Kuz Para       | PTC      | GGPB Dali Sharakot   | -do-        |
| 9    | Irfum Naz         | Abdul Qayum    | Madakhel       | PTC      | GGPB Madakhelabad    | -do-        |
| 10   | Gulshan           | Abdul Qayum    | Madakhel       | PTC      | GGPB Madakhelabad    | -do-        |
| 11   | Bibi Aiyana       | Hazrat Jamil   | Shraid         | PTC      | GGPB Barf Kot        | -do-        |
| 12   | Arfa Bibi         | Khan Wali      | Shilkanabad    | PTC      | GGPB Shilkanabad     | -do-        |
| 13   | Bibi Saifa        | Amalg Khan     | Shilkanabad    | PTC      | GGPB -do-            | -do-        |
| 14   | Bibi Hanifa       | Salf-ur Rahman | Shilkanabad    | PTC      | GGPB Bar Gaboor      | -do-        |
| 15   | Mah Jaboon        | M. Gulferaz    | Shilkanabad    | PTC      | GGPB -do-            | -do-        |
| 16   | Fahana Salf       | Salf-ur Rahman | Shilkanabad    | PTC      | GGPB Haran           | -do-        |
| 17   | Zalib-un Nisaa    | M. Gulferaz    | Shilkanabad    | PTC      | GGPB -do-            | -do-        |
| 18   | Khezona           | Hakim Khan     | Sharakot       | PTC      | GGPB Gulababad No. 2 | -do-        |
| 19   | Bibi Amna         | Bilfat         | Pattan         | PTC      | GGPB Kuz Chawa       | -do-        |
| 20   | Gul Famir         | Sikandar       | Dassu          | PTC      | GGPB Alfar Abad      | -do-        |
| 21   | Gul Badan         | Sikandar       | Dassu          | PTC      | GGPB -do-            | -do-        |
| 22   | Shakira Bibi      | Salf-ul Malook | Goshali        | PTC      | GGPB Bar Btk         | -do-        |
| 23   | Johara Bibi       | Salf-ul Malook | Goshali        | PTC      | GGPB -do-            | -do-        |
| 24   | Manhas Begum      | Rash Khan      | Goshali        | PTC      | GGPB Khuzakhel       | -do-        |
| 25   | Farzana           | Rash Khan      | Goshali        | PTC      | GGPB -do-            | -do-        |
| 26   | Gul Rohan         | Pir Dad        | Goshali        | PTC      | GGPB Bar Asol        | -do-        |
| 27   | Gulshan Bibi      | Bakhtiar       | B. Jalkot      | PTC      | GGPB -do-            | -do-        |
| 28   | Leah Khapri       | Shah Zareen    | Bar Jalkot     | PTC      | GGPB Jalos Cherto    | -do-        |
| 29   | Elzubat Shaheen   | Shah Zareen    | K. Jalkot      | PTC      | GGPB Samarabad       | -do-        |
| 30   | Sittara Johan     | Abdul Azim     | K. Jalkot      | PTC      | GGPB Samarabad       | -do-        |
| 31   | Amlina Bibi       | Inzar Gul      | Shilkanabad    | PTC      | GGPB Banjar Yanlool  | -do-        |
| 32   | Hanifa Bibi       | Inzar Gul      | Shilkanabad    | PTC      | GGPB Banjar Yanlool  | -do-        |

**CONDITIONS:-**

1. Their appointments are purely on temporary basis and liable to termination at any time / stage without assigning any reason/notice.
2. Their Certificates/ Domicile Certificates if not verified earlier, should be verified by the DDO (F) to Mr. Abdur Rahman I/C Dy. D.O (F) S&L Kohistan before handing over their charge.
3. Charge reports should be submitted to all concerned.
4. No TA/DA is allowed to any one.
5. They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belong.
6. In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
7. They should not be allowed to take over charge if their age is less than 18-years and above 35-years.
8. They should produce age and health certificate from EDO Health Kohistan before taking of charge.

(Zahir Shah)  
District Coordination Officer  
Kohistan at Dassu.

Encl: No. 856-96 / Appurto (P) U/C w/c Merit / 2005 Dated Kohistan: 25-10/2005

- Copy of the above is forwarded to:-
1. Director Schools & Literacy, NWFP Peshawar.
  2. P/O to Minister of Education NWFP Peshawar.
  3. P/O to Secretary Government of NWFP (B & L) Department Peshawar.
  4. Executive District Officer Schools & Literacy Kohistan.
  5. District Accounts Officer Kohistan.
  6. District Officer Schools & Literacy Kohistan.
  7. Deputy District Officer (P) S&L Kohistan.
  8. Candidates concerned.

(Malik Abdur Rashid)  
Executive District Officer  
Schools & Literacy Kohistan.

**NOTIFICATION**

Whereas the following teachers were reported wilful absent from duties by the concerned Assistant Sub Divisional Education Officers (Female), Sub Divisional Education Officers (Female) and Independent Monitoring Unit (IMU) Kohistan.

And whereas on the report of the visiting officers, this office issued show cause notices at home address through registered posts but neither the teachers joined their duties nor submitted convincing replies within the stipulated time (15 days) before the committees constituted for personal hearing vide this office letter no. 394-98 dated 11-02-2019 and the same were conveyed to the teachers in time.

And whereas final show cause notices were issued through two leading newspapers i.e. Daily "Hazara News" Mansehra and Daily "Akhbaar" Abbottabad dated 26/02/2019 in which teachers were directed to assume their duties and submit reason (s) of their wilful absence but neither they attended their schools nor submitted convincing replies before the committee within the stipulated period mentioned in the newspaper. Now in view of the above facts I, Mr. Khurshid Ahmed, being competent authority, as District Education Officer (female) Kohistan, is fully satisfied to impose major penalty of **REMOVAL FROM SERVICE** upon the teachers under rule 4b(iii) of E&D Rules 2011 with effect from the dates mentioned against each.

| S# | NAME OF TEACHER    | NAME OF SCHOOL          | DATE OF REMOVAL FROM SERVICE |
|----|--------------------|-------------------------|------------------------------|
| 1  | Lazhaba (G-4)      | GGPS Pashot             | 01-10-2016                   |
| 2  | Sadaf Zeb          | GGPS Pashot             | 01-10-2017                   |
| 3  | Raqiba             | GGPS Ser Garhi          | 01-10-2017                   |
| 4  | Asma               | GGPS Ser Garhi          | 01-10-2017                   |
| 5  | Farzana Wali       | GGPS Jhakh Lohi         | 01-04-2018                   |
| 6  | Shaheen Zameer     | GGPS Loohi Dader        | 01-10-2018                   |
| 7  | Gul Bibi           | GGPS Baja Loohi         | 01-04-2018                   |
| 8  | Nuzhat Ara         | GGPS Harban kot         | 01-05-2018                   |
| 9  | Tahmena Roohi      | GGPS Kuz Kamila         | 01-01-2017                   |
| 10 | Zuhra Bibi         | GGPS Kherza khail Dader | 01-10-2015                   |
| 11 | Nagina Otail (G-4) | GGPS Baja Lohi          | 01-05-2016                   |
| 12 | Shagufta Kiran     | GGPS Dhoop Lohi         | 01-01-2019                   |
| 13 | Gul Bibi           | GGPS Seral Shan         | 01-04-2018                   |
| 14 | Zarmina            | GGPS Kemia Abad         | 01-01-2019                   |
| 15 | Salma Bibi         | GGPS Kemia Abad         | 01-01-2019                   |
| 16 | Shakira            | GGPS Mehran Abad        | 01-03-2018                   |
| 17 | Masooma            | GGPS Ghee Harban        | 01-04-2018                   |
| 18 | Latifa             | GGPS Ghee Harban        | 01-01-2019                   |
| 19 | Johara Bibi        | GGPS Bar Bak            | 01-04-2018                   |
| 20 | Rasheeda Bano      | GGPS Serto Kandia       | 01-10-2017                   |
| 21 | Rehana             | GGPS Seri Gabriel       | 01-01-2019                   |
| 22 | Sara Qayum         | GGPS Seri Gabriel       | 01-11-2018                   |
| 23 | Aisha Sadiq        | GGPS Soyul Jashoi       | 01-04-2018                   |
| 24 | Bibi Hawa (G-4)    | GGPS Awaysach           | 01-12-2016                   |
| 25 | Fahmeeda           | GGPS Bhati Kuz Shrial   | 01-11-2017                   |



P-11

|    |                |                        |            |
|----|----------------|------------------------|------------|
| 26 | Bushra Hafeez  | GGPS Bhati Kuz Shiryal | 01-01-2019 |
| 27 | Salma          | GGPS Momin Abad        | 01-01-2019 |
| 28 | Safia Zareen   | GGPS Sanga Abad        | 01-01-2019 |
| 29 | Naheed Sartaj  | GGPS Sanga Abad        | 01-01-2019 |
| 30 | Mehnaz         | GGPS Berser Shared     | 01-11-2017 |
| 31 | Aisha Qureshi  | GGPS Habib Abad        | 01-11-2017 |
| 32 | Shema          | GGPS Jaren Ranolia     | 01-01-2019 |
| 33 | Durkhana       | GGPS Kas Dobair        | 01-05-2017 |
| 34 | Robina Syed    | GGPS Ali Abad          | 01-11-2018 |
| 35 | Nasreen Sultan | GGPS Tares             | 01-12-2018 |
| 36 | Fatima Akhtar  | GGPS Serzahab Abad     | 01-02-2019 |
| 37 | Rizwana Bibi   | GGPS Z K Abad          | 01-12-2018 |
| 38 | Mufeed Akhtar  | GGPS Sher Abad         | 01-12-2018 |

NOTE: Any teacher who is found involved in any embezzlement of fund/conditional grant, she will be proceeded for FIR/Anti-corruption proceedings as and when reported at any stage. Concerned DDOs are directed to recover the payment (if any) made for absence period out of their GPF etc.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(F) KOHISTAN

Endst No: 1198-1210 Dated: 20-04-2019

Copy for Information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohistan.
3. Deputy Commissioner Kohistan Lower.
4. Deputy Commissioner Kolai Palas Kohistan.
5. District Monitoring Officer Kohistan.
6. DEO (M) Kohistan Lower & Kolai Palas Kohistan.
7. District Accounts Officer Kohistan.
8. PA to Advisor to CM for Elementary & Secondary Education Khyber Pakhtunkhwa.
9. PA to Secretary (E&SE) Govt of Khyber Pakhtunkhwa Peshawar.
10. All concerned teachers.
11. PA to DEO (M/F) Kohistan.
12. Office copy.

DISTRICT EDUCATION OFFICER  
(F) KOHISTAN

خدمت جناب ڈائریکٹر صاحب E&SE خیبر پختونخواہ پشاور

عنوان: اپیل برخلاف آڈٹ نمبر 1190-1210 Endst No. 1190-1210 مورخہ 20.04.2019

جناب عالی! گزارشات حسب ذیل پیش ہیں۔

(۱)۔ یہ کہ سالکہ 25.10.2005 سے محکمہ تعلیم میں اور تاحال GGPS بریک گوشالی داسو کوہستان میں

بطور PST گزشتہ 13 سالوں سے اپنے فرائض سرانجام دے رہی ہے۔

(۲)۔ یہ کہ سالکہ نے مورخہ 28.02.2012 کو PTC ڈگری بھی حاصل کر رکھی ہے۔

(۳)۔ یہ کہ دوران سروس کبھی بھی سالکہ کو نہ غیر حاضر پایا گیا نہ اسکے خلاف کسی قسم کی کوئی محکمہ شکایت آئی ہے۔

(۴)۔ یہ کہ غیر حاضری کے بارے میں سالکہ کو کوئی علم نہیں اور نہ بتایا گیا ہے کیونکہ سالکہ ریگولر اپنی ڈیوٹی

سرانجام دے رہی ہے۔

(۵)۔ یہ کہ جب کبھی بھی محکمہ تعلیم سے کوئی شوکار نوٹس، وا تو سالکہ نے بروقت اسکا جواب دیا ہے مگر محکمہ کے

افسران نے اسے دیکھنے کی کوئی ضرورت محسوس نہ کی۔

(۶)۔ یہ کہ اچانک ایک Letter نمبر 1198-1210 مورخہ 20.04.2019 موصول کر کے حیرت ہوئی

کہ سالکہ کو ملازمت سے برطرف کر دیا گیا ہے۔

(۷)۔ یہ کہ دفتر سے یکطرفہ فیصلہ کر کے سالکہ کو سروس سے برخاست کیا گیا ہے اسی دوران نہ تو کوئی انکوائری

ہوئی ہے اور نہ سالکہ کو پوسٹل ہیئرنگ کیلئے بلایا گیا ہے۔

(۸)۔ یہ کہ سالکہ کے ساتھ نہایت زیادتی ہوئی ہے سالکہ کے چھوٹے چھوٹے بچے ہیں، نہایت ہی غریب

خاندان سے اور پسماندہ علاقے سے تعلق رکھتی ہے۔

لہذا استدعا کی جاتی ہے کہ مندرجہ بالا عنوان کی روشنی میں سالکہ کا برخاستگی کا حکم نامہ ختم کر کے سالکہ کو اپنی

پوسٹ پر بحال کرنے کا حکم صادر فرمایا جائے تو سالکہ تاخیر دعا گور ہے گی۔

ارض

جو جڑہ بی بی PST گورنمنٹ گرلز پرائمری سکول بریک گوشالی داسو کوہستان

مورخہ 15-5-2019



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

Ammeure — D

No. 6202 /FNp.324/F/Appeal Kohistan

Dated Peshawar the 08/10/ /2019

The District Education Officer,  
(F) Kohistan

Subject:- APPEALS REGARDING REMOVAL FROM SERVICE

I am directed to refer to your letter No.5158 dated 02/09/2019 on the subject cited above and to state that the competent authority has rejected the appeals of the following teachers. Hence she may be informed accordingly.

| S.No | Name and Designation | School Name              |
|------|----------------------|--------------------------|
| 1.   | Zarina PST           | GGPS Kemia Abad Kohistan |
| 2.   | Salma Bibi PTS       | ---do---                 |
| 3.   | Shakira Bibi PST     | GGPS Mehran Abad         |
| 4.   | Gul Bibi PST         | GGPS Seral Shah          |
| 5.   | Sadaf Zeb PST        | GGPS Pashot              |
| 6.   | Shaheen Zameer PST   | GGPS Loohi Dader         |
| 7.   | Raqiba PST           | GGPS Ser Garhi           |
| 8.   | Nagina Otail PST     | GGPS Baja Lohi           |
| 9.   | Asma PST             | GGPS Ser Garhi Kandia    |
| 10.  | Farzana Wali PST     | GGPS Jhakh lohi          |
| 11.  | Rehana Bibi PST      | GGPS Seri Gabriel        |
| 12.  | Gul Bibi PST         | GGPS Baja Looni          |
| 13.  | Johaira Bibi PST     | GGPS Bar, Bak            |
| 14.  | Gul Shanaz Bibi PST  | GGPS Nimraty Sosak Upper |
| 15.  | Bibi Rashida PST     | GGPS Serto Kandia        |
| 16.  | Shagufta Kiran PST   | GGPS Dhoop Lehi          |
| 17.  | Huree PST            | GGPS Nimraty Sosak Upper |
| 18.  | Latifa PST           | GGPS Ghee Harban         |
| 19.  | Aisha Qurashi PST    | GGPS Habib Abad Koli     |
| 20.  | Aisha Sadiq          | GGPS Soyal Jashoi        |
| 21.  | Naheed Sartaj PST    | GGPS Sanga Abad          |

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

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)  
E&SE Khyber Pakhtunkhwa

Deputy Director (Female)  
E&SE Khyber Pakhtunkhwa

# وکالت نامہ

P-14

بعدالت جناب سروس ٹریبونل KPK پشاور

جو حجرہ بی بی نام حکومت خیبر پختونخواہ وغیرہ

سروس اپیل

اپیلانٹ

باعث تحریر آئنگہ!

منجانب:

## عبدالصبور خان ایڈووکیٹ ہائی کورٹ

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیرونی وجوہات ہی بمقام پشاور ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رُوئے عدالت حاضر ہوتا ہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشاور کی علاقہ کسی اور جگہ پشوری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پشاور کی پشوری کے آگے یا پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپردداشتی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پر داختمثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 29.10.2019

عبدالصبور خان

جو حجرہ

جو حجرہ بی بی سابقہ پرائمری سکول ٹیچر گورنمنٹ گرلز پرائمری سکول بریک گوشالی تحصیل داسو ضلع کوہستان اپر

(اپیلانٹ)

Attested & Accepted  
Abdul Saboor Khan  
Advocate High Court