

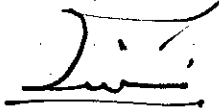
28.07.2022

Due to summer vacations, the case is adjourned to 29.09.2022 for the same as before.

  
Reader

29.09.2022


Learned counsel for the appellant present. Mr. Muhammad Imran, Subject Specialist alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as preliminary hearing on 27.10.2022 before the S.B at Camp Court D.I.Khan.

  
(Salah-Ud-Din)  
Member (J)  
Camp Court D.I.Khan

27<sup>th</sup> Oct 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Imran Shah, Senior Subject Specialist for respondents present.

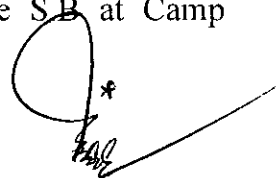
Written reply/comments on behalf of the respondents has not submitted. Requested for time to submit the same on the next date. Last chance is give to submit written reply/comments. To come up for written reply/comment/preliminary hearing on 21.11.2022 before S.B at camp court D.I.Khan. P.P given to the parties.

  
(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan

28.06.2022

Mr. Mateeullah Rind, Advocate for the appellant present.

Learned counsel for the appellant contended that the appellant is aggrieved of the impugned order dated 31.12.2019 whereby respondent No. 3, set aside being invalid, the first and second appointment orders of the appellant from the date of its issuance and terminated services of the appellant. The appellant submitted departmental appeal to respondent No. 1 on 23.11.2021 which was not decided within the statutory period hence the instant service appeal was filed in the Service Tribunal on 21.03.2022. When attention of the learned counsel for appellant was drawn towards the limitation issue for about 02 years lapsed between the impugned order and departmental appeal, he could not justify the delay except that it was during pendency of the COC before Honourable Peshawar High Court, D.I.Khan Bench dated 26.10.2021 that the impugned order dated 31.12.2019 came to limelight. It is further observed that no application with the service appeal for condonation of the limitation period, ~~has been submitted~~. Moreover, no specific date is mentioned that the impugned order in question had been communicated to the appellant. As such, it deems appropriate that pre-admission notices be issued to the respondents at this stage for submission of reply/comments. To come up for reply/comments as well as preliminary hearing on 28.07.2022 before S.B. at Camp Court, D.I.Khan

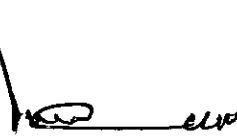


  
(Mian Muhammad)  
Member (E)  
Camp Court, D.I.Khan

Form- A

FORM OF ORDER SHEET

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

Case No.- 472/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/04/2022	<p>The appeal of Mst. Shazia Kiran resubmitted today by Mr. Mutee Ullah Rind Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR-</p>
2-	13-4-2022	<p>This case is entrusted to touring Single Bench at D.I. Khan for preliminary hearing to be put up there on <u>29.04.2022</u></p> <p> CHAIRMAN</p>
	29-4-2022	<p>Tour to Camp Court D-I Khan has been cancelled. To come up for the same on 28/6/2022 as before</p> <p> Registrar</p>

The appeal of Mst. Shazia Kiran D/O Inayat Ullah, Caste Cheena R/O Basti ustrana North, District D.I. Khan received today i.e. on 21.03.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

1. Checklist attached with the appeal is unsigned.
2. Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 737 /S.T,

Dt. 24-3 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mutee Ullah Rind Adv. P.  
High Court D.G. Khan


Objection resolved and

resubmit.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 555

Dated 04/04/2022

  
2/4

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

Case Title: \_\_\_\_\_

vs \_\_\_\_\_

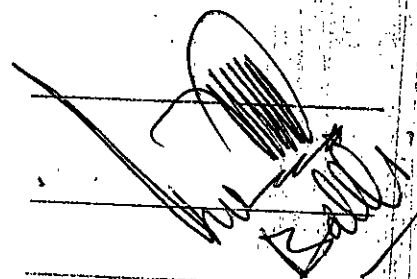
S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Counsel Mutezullah Qind Ali</u>		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.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

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

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Dated: \_\_\_\_\_



2/4/22

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

In service Appeal No. 472 /2022

Shazia Kiran  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**I N D E X**

S.No.	Description of documents	Annexure	Pages
1.	Appeal along with affidavit	--	1 - 7
2.	Copies of the writ petition #462-D/2009 and judgment dated 27/11/2014	A & B	8 - 21
3.	Copies of COC petition #186-D/2015, order dated 19/01/2016 and reinstatement order # 9120-25/CT/F dated 15/12/2015	C, D & E	22 - 25
4.	Copy of the order dated 21/06/2016	F	26
5.	Copies of the COC and judgment dated 19/11/2018	G & H	27 - 34
6.	Copies of COC #159-D/2019 and reply dated 16/12/2021	I	35 - 42
7.	Copy of the termination order dated 31/12/2019	J	43 -
8.	Copy of the departmental appeal	K	44 - 46
9.	Vakalatnama		47

Dated 17/03/2022

Your humble appellant

*Shazia Kiran*  
**Shazia Kiran**

Through counsel

*Muteeullah Bina*  
**Muteeullah Bina**  
 Advocate High Court

①

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

Service Appeal No. 472 /2022

**Mst. Shazia Kiran** daughter of Inayatullah caste Cheena  
r/o Basti ustrana North, District Dera Ismail Khan.

**(Appellant)**

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Secretary Education Department, Peshawar.
2. Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa Peshawar.
3. District Education officer (Female), District Dera Ismail Khan.

..... **(RESPONDENTS)**

②

**APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER NO. 28235-39 DATED 31/12/2019 ISSUED BY RESPONDENT NO.3 WHICH WAS SUBMITTED BEFORE THE HONOURABLE PESHAWAR HIGH COURT BENCH DERA ISMAIL KHAN DURING PENDENCY OF COC#159-D/2019 TITLED "SHAZIA KIRAN VS. SYADA ANJUM (DEO) FEMALE DERA ISMAIL KHAN" ON 26/10/2021, WHEREBY APPELLANT WAS TERMINATED FROM SERVICE.**

**PRAYER**

On acceptance of this appeal, impugned order No. 28235-39 dated 31/12/2019 issued by Respondent No.3 may please be set-aside and the respondents be directed to reinstate the appellant in service with all back benefits.

**Note:** Addresses given above shall sufficient the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

**Respectfully Sheweth;**

The appellant humbly submits as under;


1. That the appellant was appointed as C.T in the year 2007, after appointment the DCO (the then Deputy Commissioner) Dera Ismail Khan terminated the appellant. The appellant filed a writ petition against the order of the DCO D.I.Khan. Writ petition was accepted/allowed by the Honourable Peshawar High Court Bench Dera Ismail Khan in favour of appellant. Copies of the writ petition#462-D/2009 and judgment dated 27/11/2014 are annexed as **Annexure-A & B.**
2. That the respondents did not obey the order/judgment dated 27/11/2014, hence, the appellant submitted contempt of court petition before the Honourable Peshawar High Court Bench Dera Ismail Khan and the respondents produced reinstatement order of appellant before the court and the COC was disposed of on /9/01/2016 accordingly. Copies of COC petition#186-D/2015, order dated 09/01/2016 and reinstatement order# 9120-25/CT/F dated 15/12/2015 are annexed as **Annexure-C, D & E.**
3. That on 21/06/2016, after six months the respondents withdrawn the reinstatement order dated 15/12/2015. Copy



of the order dated 21/06/2016 is annexed as **Annexure-F**. The appellant, once again approached the Peshawar High Court Bench Dera Ismail Khan through COC Petition No. 389-D/2016 which was accepted in detail judgment writ petition No. 955-D of 2018 on 19/11/2018. Copies of the COC and judgment dated 19/11/2018 are annexed as **Annexure-G & H**.

4. That the respondents refused to obey the order dated 19/11/2018 of the Peshawar High Court, hence, the petitioner filed another COC petition No. 159-D/2019 in which the respondents were directed to submit their comments/reply which was submitted by the respondents on 08/01/2021 wherein the respondents even did not mention the termination order of petitioner. Copies of COC#159-D/2019 and reply dated 08/01/2021 are jointly annexed as **Annexure-I**.
5. That on 26/10/2021, during arguments, the respondents submitted notification/order No. 28235-39 dated 31/12/2019 vide which the service of petitioner was terminated which is against law, facts, rules and service policy. Copy of the termination order dated 31/12/2019 is annexed as **Annexure-J**.
6. That feeling aggrieved by the impugned termination order the appellant preferred the departmental appeal to the respondent#1 being appellate authority on 23/11/2021 but no response has yet been received by the petitioner. Copy of the departmental appeal is annexed as **Annexure-K**.
7. That feeling aggrieved by the impugned termination order dated 31/12/2019 and indecision the department appeal of the appellant, jurisdiction of this worthy service tribunal is being invoked in attending circumstances, inter alia on the following grounds amongst others;

18  
19  
**G R O U N D S**

- a. That the impugned termination order dated 31/12/2019 and indecision of appellant's departmental appeal is illegal, against services Law and rules, without jurisdiction, in violation of the precedents of Honourable apex courts of the country and is not justifiable for any reason whatsoever.
- b. That appellant was appointed against vacant post C.T and after submission of all formalities. Since then, Appellant had served the education department and invested her full skills, energy and honesty in performance of her duties but, the act of respondents is injustice to with appellant and termination order is against Law.
- c. That reasons mentioned in impugned termination order are baseless this reasons already decided in writ petition No. 462-D/2009 decided on 27/11/2014 and termination order was issued without adopting any codal formalities and based on already decided issue. Hence, the impugned termination order is liable to be set aside.
- d. That in this regard at a number of occasions, the respondents already ignored the decisions of Peshawar High Court in WP#462-D/2009 dated 27/11/2014 and writ petition No. 955-D/2018 decided on 19/11/2018. The respondents have been trying to mislead the Constitutional courts which result is clear. 
- e. The act/refusal/omission, on the part of respondents is not grounded in reason nor does it smack of sensible or saner approach.
- f. That the impugned removal/termination order is illegal, against rules and fundamental rights and against principle


of natural justice and is thus liable to be ignored and to be struck down.

- g. That appellant being citizen of Pakistan deserves to be dealt in accordance with law and the treatment meted out to her is in violation of Article 4 of our Constitution.
- h. That counsel for the appellant may kindly be allowed to raise additional grounds at the time of arguments.

On acceptance of this appeal, impugned order No. 28235-39 dated 31/12/2019 issued by Respondent No.3 may please be set-aside and the respondents be directed to reinstate the appellant in service with all back benefits

Dated 17/03/2022

Your humble appellant

  
Shazia Kiran

Through counsel

  
Muteullah Kind  
Advocate High Court

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

In service Appeal No. \_\_\_\_\_/2022

Shazia Kiran  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**CERTIFICATE**

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Court.

March 17, 2022

*Shazia Kiran*  
Appellant

**NOTE**

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

March 17, 2022

*Shazia Kiran*  
Appellant's counsel

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

In service Appeal No. \_\_\_\_\_/2022

Shazia Kiran  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**AFFIDAVIT**

I, **Shazia Kiran**, appellant herein, do hereby solemnly affirm on oath:-

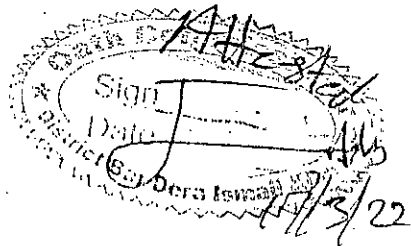
1. That the accompanying appeal has been drafted by counsel following our instructions;
2. That all parawise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

March 17, 2022

*Shazia Kiran*  
Deponent

Identified By

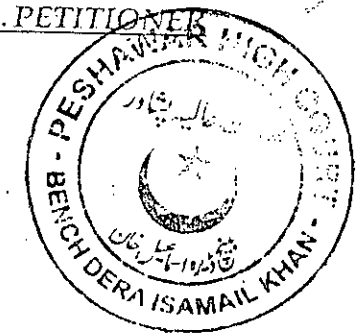
*Muteeullah Rind*  
Advocate High Court



**BEFORE THE PESHAWAR HIGH COURT D.I.KHAN BENCH**

Writ Petition No. 462/2009

Shazia Kiran D/o Inayatullah  
Caste Chinna R/o Busti Ustrana North, Dera Ismail Khan.



.....PETITIONER

**VERSUS**

1. District Co-ordination Officer, Dera Ismail Khan
2. Head Mistress, GGHS, Fatah, Dera Ismail Khan.
3. District Account Officer, Dera Ismail Khan.

.....RESPONDENTS

**WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION ISLAMIC REPUBLIC OF PAKISTAN 1973**

**BRIEF FACTS:**

1. **That** the Petitioner being qualified C.T Teacher, was denied her rights of appointment, therefore, she instituted a civil suit against the education department, D.I.Khan in the year 2006 and during the pendency of the suit the EDO Education advertised different posts of C.T. for District D.I.Khan. Copies of the plaint, Advertisement and application are enclosed as Annexure "A", "B" & "C" respectively.
2. **That** subsequently the petitioner was appointed as C.T. on 01.10.2007 against vacant post at GGMS, Khutti, where she took charge on 30.10.2007. Copy of appointment order is enclosed as Annexure "D".
3. **That** when the documents/order of appointment for the purpose of salary were sent to Respondent No. 3, the same were objected on the pretext that there is no vacant post in GGMS Khutti, therefore the Executive District Officer Schools and Literacy, D.I.Khan issued fresh appointment order of the Petitioner against a vacant post at GGHS Fatah, D.I.Khan, where after salary/pay of the Petitioner for the month of January 2008 was released. Copy of appointment order is enclosed as Annexure "E".

Handwritten notes and signatures on the left margin, including '26/12' and '3/1/08'.

ATTESTED  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan  
17-11-2009

B

4. **That** a group of teachers including the Petitioner protested against the Respondent No. 2 by submitting written application containing therein certain forceful allegations/proofs including one that she use to visit the school once in a week and she kept the attendance of register at her home instead of school and she allowed teacher of her own choice to make attendance in the afore said register illegally. Copy of application is enclosed as Annexure "F".

5. **That** Respondent No. 2 as a counter attack and revenge stopped the pay of Petitioner vide order dated 17.04.2008 by recording the words "court case" on the source Form II, which is/was to be used in the office of Respondent No. 3 for payment of pay/salary, therefore no salary/pay is being paid to the Petitioner till today irrespective of the fact that the Petitioner is performing her duties with great zeal. Copy of source Form-II, is enclosed as Annexure "G".

6. **That** facing with these situations, the Petitioner then sought the indulgence of the learned Civil Judge-I, D.I.Khan for release of her salary by submitting an application in the court where the suit was pending and the Learned Civil Judge was pleased to order the payment/release of pay. Copies of application along with order sheet, order of EDO and order of DAO are enclosed as Annexure "H" "J" "K" & "L" respectively.

Handwritten notes: 40, 26/11/08, B. Khan

7. **That** in spite of issuance of order by the Civil Court, Respondent No. 2 was reluctant to release the arrears of pay of the Petitioner and further asked the Petitioner that the pay of the Petitioner would be released provided the petitioner should pay Rs. 30,000/- as gratification and also to withdraw her Civil Suit.

Handwritten notes: 26/11, 30/11/08

3. **That** being a member of poor family and orphan could not complete and satisfied the demand of Respondent No. 2, this fact was also brought into the notice of high ups of the Education Department and into the notice of District Government through Publication in Local newspaper. Copy of newspaper is enclosed as Annexure "M".

ATTESTED  
*[Signature]*  
EXAMINOR

Mosnawar High Court Bench,  
Dera Ismail Khan

17-11-2008

(10)

9. **That** Respondent No. 1 and 2 with their mala fide intention, ulterior motive, ill will and active connivance passed illegal orders dated 17.04.2008, 20.05.2008, 24.05.2008 and 09.06.2008, vide which services of the Petitioner were terminated but later on the application of Petitioner all the afore said orders of Respondents collectively were cancelled by District Nazim, D.I.Khan, vide order dated 13.09.2008. Copies of all the orders of Respondents along with order of District Nazim are enclosed as **Annexure "N" & "O"** respectively.

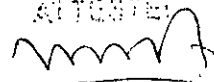
10. **That** having no other remedy, the Petitioner sought the constitutional jurisdiction of this Hon'ble Court by filing W.P No. 244/2008 wherein the petitioner impugned the legality of order of termination of Service by D.C.O, D.I.Khan as well as order of Head Mistress GCHS Fatch, District D.I.Khan of stoppage of salary/pay of the Petitioner, both the persons were/are Respondent No. 1 and 2 respectively in the earlier writ petition and in the present writ petition as well.

11. **That** the earlier writ petition has been disposed of vide order dated 07.04.2009 and the petition was treated to be representation and to be decided positively with twenty days after hearing of Petitioner/Mst. Shazia Kiran or her Counsel and further direction were issued to Respondents 1 to 3 to thrash out the matter, It was also directed in the judgment that if the Petitioner grievance were not redressed, she would be at liberty to move afresh in the matter. Copy of order/judgment is enclosed as **Annexure "P"**.

12. That vide order dated 07.04.2009, the writ petition was disposed off with following observations and directions.

"The instant writ petition is being filed in compliance of direction as contained in judgment dated 07.04.2009 in 'W.P No. 244/2008 Shazia Kiran v/s DCO etc, before giving direction the Hon'ble Court issued orders dated 04.12.2008 to Respondents 1-3 to furnish para wise comments of the writ petition at the earliest but not later than three weeks. Some once again the Hon'ble Court issued orders dated 11.02.2009 for comments as comments from Respondents No. 1 and 3 were not received. They were reminded to furnish the same positively

ATTESTED:



EXAMINOR

 Pesawar High Court Bench,  
 Dera Ismail Khan

17.11.2008



within a fortnight otherwise, the matter be taken up on the existing record. That the same on 25.03.2009, the Respondent No. 3 requested for adjournment to file comments last chance given adjourned to 07.04.2009, following are the directions given by Hon'ble High Court to the Respondent No. 1 to 3".

**DIRECTIONS:**

1. When the record was deeply scanned, the main grievance, which emanated is that whether the petitioner Mst. Shazia Kiran was rightly dismissed from service by the D.C.O and whether he was competent to do so.
2. Thus we treat this writ petition as representation and remit it to Respondents No. 1 to 3 with a direction to trash out the matter, treat the same as representation and to decide the positively within twenty days after hearing Mst. Shazia Kiran or her representation/or counsel.

**Justice:** justice will be taken by the two forms.

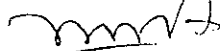
1. In Judicial Justice
2. Administration Justice.

The earlier writ petition No. 244/2008, wherein the petitioner has directly aggrieved from the Administrative Authority. But the Hon'ble Court has directed by administrative Authority for justice.

The administrative authority Respondent No. 1 neither attend the Hon'ble Court out nor gave comments in earlier W.P No. 244/2008.

13. **That** the D.C.O/Respondent No. 1, provided an opportunity of hearing to the counsel for the Petitioner and verbally told to the counsel for Petitioner that the order of termination passed by the Respondent No. 1/D.C.O has already been cancelled by the District Nazim.

ATTESTED



EXAMINOR

Fesnawar High Court Bench,  
Dera Ismail Khan

17-11-2011

(12)

14. **That** it is very unfortunate for the Petitioner that the orders/judgment of this Hon'ble Court has not been complied with by Respondents who are responsible Officers of the District but they have not bothered even to intimate any written order to the Petitioner but impliedly refused to obey the orders of this Hon'ble Court which of course amounts to contempt of this Hon'ble Court.

15. **That** having no other alternate and speedy remedy, the petitioner approaches this Hon'ble Court once again under the constitutional jurisdiction, inter alia on the following grounds:-

**GROUND:-**

1. **That** the Respondent No. 1 violated statutory law, "Local Law Ordinance 2002" according to law the DCO/Respondent No. 1, neither have the authority to appoint Govt servant in any other department nor can he remove any civil servant. Relevant law is annexed as **Annexure "Q"**.

2. **That** the impugned order dated 17.04.2008, 20.05.2008, 24.05.2008 and 09.06.2008 of Respondent No. 1 are illegal, without jurisdiction and ineffective upon the rights of the Petitioner, as he is no authority to issue such like orders and the education department is legally not obliged to obey the orders of Respondent No. 1, as the same orders are against the service policy of the petitioner.

3. **That** the Respondents No. 1 and 2 are misusing their official capacity, while dealing with the service of the Petitioner, particularly when there are clear cut orders of a competent Court of jurisdiction i.e. Civil Judge-I, D.I. Khan, when on the assurance of Respondent No. 2, the Petitioner withdrew her civil suit.

ATTESTED  
EXAMINOR  
Ferozwar High Court Bench,  
Dera Ismail Khan.  
17-11-2007

4. **That** the Petitioner is being discriminated by Respondent No.1 and 2 for the ulterior motive and to harass the Petitioner, as both of them, while using of their official duties have done acts which are not recognized by the law on the subject matter because when the Petitioner is performing her duties, she is legally entitled to get salaries, as she is still in service and performing her duties.

5. **That** the action of non-disposal of representation as a consequence of this Hon'ble Court order dated 07.04.2009 passed in writ petition No. 244/2008 amounts to contempt of this Hon'ble Court for which suo moto action may please be taken.

6. **That** the counsel for the Petitioner may be allowed to raise additional grounds during the course of arguments.

**It is**, therefore, humbly prayed that on acceptance this writ petition, this Hon'ble Court may very graciously be pleased to issue writ declaring the impugned orders dated 17.04.2008, 20.05.2008, 24.05.2008 and 09.06.2008 issued by the Respondents collectively to be illegal, void, without lawful authority, without jurisdiction and violation of law and ineffective upon the rights of the Petitioner and as a consequence thereof direction may please be issue to release the salary of the Petitioner to meet the ends of justice.

Any other relief deemed appropriate may also be granted in the circumstance.

ATTESTED

*[Signature]*

EXAMINOR

Mesnawar High Court Bench,  
Dera Ismail Khan

17.11.2011

20/11

*[Signature]*

3/11/11

*[Signature]*  
Bakht  
(21)

(15)

**INTERIM RELIEF: -**

Mean while interim relief may pleased be granted and directions may pleased be issued to respondents to pay the salaries of the Petitioner with held by the respondents and further to resume the payment of monthly salary to the Petitioner till the disposal of main petition.

*[Handwritten signature]*

Dated. 30/10/2029

Your humble Petitioner

*[Handwritten signature]*

SHAZIA KIRAN  
Through counsel

*[Handwritten signature]*

(MUTIULLAH RIND)  
Advocate, High Court  
Dera Ismail Khan

ATTESTED  
*[Handwritten signature]*

EXAMINOR

Ferozpur High Court Bench,  
Dera Ismail Khan

17-11-2024

Dera Ismail Khan

JUDGMENT SHEET  
IN THE PESHAWAR HIGH COURT, D.I.KHAN BENCH  
(Judicial Department)



w.P. No. 462 of 2009

JUDGMENT

Date of hearing 27-11-2014.

Appellant-petitioner Shazia Kiran by M/s. Muhammad Yousef Khan & Matinullah Rind Advocates.

Respondent DC Othman by Mr. Samanullah Shaiman AAG

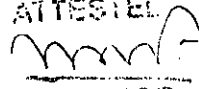
IKRAMULLAH KHAN, J. The petitioner Mst. Shazia

Kiran has challenged her dismissal order dated 17.4.2008 by filing this writ petition with the following prayer:-

*"that on acceptance of this writ petition, this Hon'ble Court may very graciously be pleased to issue writ declaring the impugned orders dated 17.4.2008, 20.5.2008, 24.5.2008 and 09.6.2008 issued by respondents to be illegal and violation of law and ineffective upon the rights of the petitioner and as a consequence thereof direction may please be issued to release the salary of petitioner to meet the ends of justice.*

*Any other relief deemed appropriate may also be granted in the circumstances."*

2. In essence, petitioner was appointed as a C.T teacher and was posted at GGMS, Khutti, D.I.Khan vide appointment order dated 01.10.2007. As there was no vacant post in GGMS, Khutti, she was appointed as C.T

ATTESTED  
  
EXAMINOR

Peshawar High Court Bench,  
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17.11.2014

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teacher at GGMS, Fateh, D.I.Khan and she joined her services, whereas salary for the month of January, 2008 was paid to her by the respondent No.3. Thereafter her salary was stopped and finally she was terminated therefrom her services vide the impugned notification by the respondent.No.1.

3. Subsequent to the present writ petition, petitioner had filed another W.P.No.244/2008, which was disposed of by this Court through its judgment dated 07.4.2009, whereby the writ petition was treated as Departmental Representation and direction was made that it be disposed of in accordance with law within 20 days, otherwise, petitioner would be at liberty to file fresh writ petition.

4. Respondents failed to dispose of the representation submitted to them by this Court with clear direction, hence the instant writ petition.

5. The learned counsel for the petitioner contended that petitioner was appointed thereafter fulfillment of all the codal formalities required under the rules for the purpose, being qualified and eligible for the post of C.T teacher, but she was terminated by respondent .

ATTESTED



EXAMINOR

Resnawar High Court Bench,  
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17.11.2011

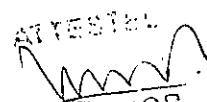
(18)

11.6.2009, the report of the inquiry committee was given effect and all those employees appointed by illegal orders of the then E.D.O, D.I.Khan, who were appointed between 01.7.2008 and 30.6.2009 were accordingly terminated. Some of the terminated employees invoked the jurisdiction of the learned Khyber Pakhtunkhwa Service Tribunal and on acceptance of their appeal, they were reinstated by the learned Service Tribunal but the judgment of the learned Service Tribunal was set aside by Honourable Supreme Court of Pakistan through its judgment dated 24.2.2012, hence the matter had attained finality and become past and close subject, could not be reviewed by this Court in exercise of its constitutional jurisdiction under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973.

7. We have heard arguments of learned counsel for the parties and gone through the record.

8. Before we embark upon merit of this petition, it would not be out of context to give reference to some lacunas accrued in this writ petition, which needs rectification.

9. The Government of Khyber Pakhtunkhwa as well as E.D.O, D.I.Khan have not been made parties to the instant

ATTESTED  
  
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Muzaffargarh High Court Bench, I  
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17-11-2021

(19)

writ petition, therefore, no any appropriate writ could be issued to them as they were not made parties to the instant writ petition. Moreover, on direction of this Court, the E.D.O (Female), D.I.Khan has submitted her parawise consolidated comments and has taken the same defence as that of respondent No.1 to the effect that petitioner was terminated thereafter proper inquiry and is included amongst those 1613 employees, who were appointed illegally, without following the required codal formalities for appointment as prescribed by the Government of Khyber Pakhtunkhwa under Appointment Posting and Transfer Rules, 1989.

10. As in this writ petition, the only issue, which is to be decided by this Court, is whether the termination order passed by respondent No.1 could be termed as an order passed by a lawful authority?

11. As the issue raised herein is already decided by the apex Court in Mohammad Ali and 11 others. Vs. Province of KPK through Secretary, Elementary and Secondary Education, Peshawar and others (2012 SCMR 673), wherein the same question of law was involved. The learned Khyber Pakhtunkhwa Service Tribunal had declared that respondent No.1, the then D.C.O, D.I.Khan

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Peshawar High Court Bench,  
Dera Ismail Khan

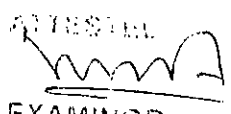
17-11-2011



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terminated similarly appointed person as the petitioner and it was declared that D.C.O, D.I.Khan was not competent authority either to appoint or terminate employees in BPS-1 to BPS-10 by rendering its judgment dated 27.10.2011, but the same judgment was set aside by the apex Court through its judgment reported as 2012 SCMR 673 ibid, therefore, this Court could not review any finding given by the apex Court and the issue herein is accordingly disposed of. However, the stance of the petitioner is that she was appointed on merit thereafter following all the legal codal formalities and she was never amongst those whose cases were either inquired or found illegal and were accordingly terminated, while on the other hand, the stance of E.D.O (Female) and respondent No.1 is that she was included amongst those, whose appointment orders were found illegal and irregular, which had been confirmed by the apex Court. On direction of this Court dated 25.3.2014, the learned Additional Advocate General provided the termination order of 1613 employees who were terminated by the competent authority thereafter proper inquiry in regard to their appointments, however, with careful scrutiny of the said order, the name of the petitioner is not found amongst the terminated employees.



EXAMINOR:  
Ferozwar High Court Bench,  
Dera Ismail Khan

17.11.2011

(21)


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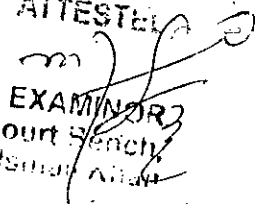
12. For the reasons mentioned hereinabove, this writ petition is accepted only to the extent that if her name is not included amongst those employees, whose appointments were found illegal and irregular and were accordingly terminated, then her termination shall be treated as illegal and without any lawful authority and she be deemed to be in service of the Education Department, D.I.Khan.

Announced.  
Dt: 27.11.2014.  
Habib:\*

21/11/15

  
JUDGE

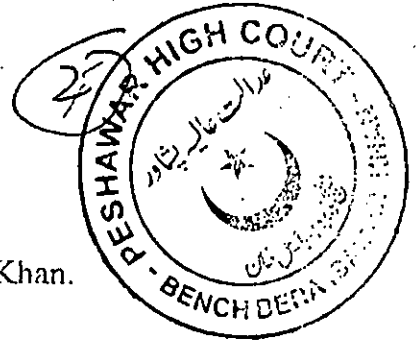
  
JUDGE

ATTESTED  
  
 EXAMINER  
 Pesnawar High Court Bench  
 Dera Ismael Khan

17-11-2014

**BEFORE THE PESHAWAR HIGH COURT**  
**D.I.KHAN BENCH.**

Contempt Petition 186 /2015



**Shazia Kiran D/O Inayatullah**  
Cast Chinna R/O Busti ustrana North, Tehsil & District D.I.Khan.

.....(Petitioner)

Versus

**Mr. Riyaz Sawati, District Education Officer (Male) Dera Ismail Khan.**

.....Respondent

**CONTEMPT PETITION U/S 3 OF THE CONTEMPT OF COURT**  
**ACT READ WITH ALL ENABLING PROVISIONS FOR**  
**INITIATING CONTEMPT PROCEEDINGS AGAINST**  
**RESPONDENTS.**

Filed to file 532

Add: Registrar.  
Respectfully Shewith,

1. That the petitioner filed a writ petition No. 462 of 2009 against the respondent before the Honourable Peshawar High Court Bench D.I.Khan.

Copy of the writ petition is enclosed herewith as Annexure-A.

2. That, on 27-11-2014, The Honourable Peshawar High Court, Dera Ismail Khan was pleased to pass the judgment in favour of the petitioner. Copy of the Judgment dated 27-11-2014 is enclosed as Annexure-B.

3. That the petitioner obtained copies of the order dated 27-11-2014, thereafter, on 26-01-2015, the petitioner went to the Respondent's Office and submitted an application along with orders dated 27-11-2014. The respondent is still silent upon the order of this Honourable Court and now the respondent clearly refused to obey the orders of this Honourable Court.

4. That since the aforesaid order passed by this Honourable Court has been violated, the petitioner is left with no option but to invoke the powers

TESTE:  
*[Signature]*

EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan

(8)

(93)

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vested in the Honourable Court for initiating contempt proceedings or other appropriate order thereon.

- 5. That respondents have been guilty of disobedience of the lawful orders passed by this Honourable Court and therefore, a penal action be initiated against respondents under the law.

It is therefore, respectfully prayed that proper contempt of court proceedings be initiated against the respondents.

Dated: 18-02-2015

Your Humble Petitioner  
Shazia Kiran

S. Kiran  
Through Counsel

Muteullah Rind  
Advocate High Court

Filed today 18/2  
At Registrar.  
21/2/15

**AFFIDAVIT**

I, Muteullah Rind Advocate High Court, counsel for petitioner, do hereby solemnly affirm and declare on Oath that contents of the accompanying contempt petition are true and correct as communicated to me by my client and nothing has been deliberately concealed from this Hon'ble Court.

Dated: 20-02-2015

Name Muteullah Rind  
No. H.M. DM  
R/O DM  
On the 18th day of Feb  
2015  
On this day I have personally  
verified the contents of the above  
affirmation and the same are  
true and correct as stated  
Address DM  
District DM  
District DM  
District DM

Deponent  
Muteullah Rind

ATTESTED  
[Signature]  
EXAMINER  
Feshawar High Court Bench  
Dera Ismail Khan  
17-11-2014

IN THE PESHAWAR HIGH COURT, D.I. KHAN BENCH

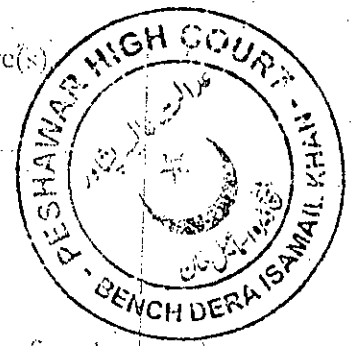
FORM OF ORDER SHEET

Date of order or proceedings (1)

19.01.2016

Order or other proceedings with signature of Judge(s)

(2)



C.O.C. No.186-D/2015.

Present: Mr. Matiullah Rind, Advocate for the petitioner.

Addl: A.G. for the contemnors.  
\*\*\*

MUHAMMAD YOUNIS THANEEM, J.- In view of order dated 15.12.2015 (copy placed on file), this COC has served its purpose, dismissed accordingly.

*M. Y. Thaneem*  
JUDGE  
*[Signature]*  
JUDGE

ATTESTED

EXAMINER

Peshawar High Court  
Dera Ismail Khan

17-11-2016

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OFFICE OF THE EXECUTIVE DISTRICT EDUCATION OFFICER (FEMALE)

D. I. ISMAIL KHAN

Ph No: 9280133

APPOINTMENT ORDER

In the light of judgment dated 27/11/2014 of the Honourable Peshawar High Court Bench Dera Ismail Khan, Mst. Shazia Kiran D/o Inayatullah R/o Basti Ustarana North, Dera Ismail Khan bearing CNIC # 12101-6611484-6, which was already appointed on 01/10/2007 vide dary No. 20390-94, as CT Teacher at GGHS Fateh, Tehsil Prova, Dera Ismail Khan, which was terminated by DCO D.I.Khan. Now she is reinstated/ appointed as CT Teacher at GGMS Meali, D.I.Khan through WP No. 462 of 2009 on 27/11/2014.

TERMS & CONDITION:-

1. Charge report should be submitted to all concerned.
2. That in terms of order dated 27/11/2014 of the august Peshawar High Court, Mst. Shazia Kiran is reinstated subject to the condition of the results of appeal if any filed before the Supreme Court of Pakistan.
3. The candidate will produce Health & age certificate from the M/S concerned. (If needed)
4. The original documents may be check / verified by concerned Board/University through DCO concerned before handing over charge. (If needed)
5. No TA/DA is allowed.
6. This order will be applicable from the date of issuance.

*Self*  
District Education Officer  
(Female) Dera Ismail Khan.

Endst No. 9120-25 /CT/F.

Dated D.I.Khan the 15-12-2015

Copy forwarded for information and necessary action to:

- 1) The Registrar Peshawar High Court Bench D.I.Khan.
- 2) The Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 3) The District Comptroller of Accounts D.I.Khan.
- 4) The PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department Peshawar.
- 5) The Advocate General Peshawar High Court D.I.Khan.
- 6) The candidate Concern.

*[Signature]*  
District Education Officer  
(Female) Dera Ismail Khan



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN**

**OFFICE ORDER:**

You, Mst: Shazia Kiran D/O Inayat Ullah resident of Basti Ustarano North D.I. KHAN, bearing CNIC No. 12101-6611484-6, were being reinstated vide Honorable High Court judgment Dated: 27/11/2014 in a situation when the undersigned took the charge on 5/6/2015 and your contempt petition was already pending before the honorable Peshawar High Court Bench D.I.Khan. Although your reinstatement, in the light of the said judgment, was subject to the condition, you may not include amongst those employees whose appointments were found illegal/irregular and were accordingly terminated. But regretted to say that you include amongst those employees whose appointments were found illegal / irregular. It is regretted further that you were not with clean hand and had concealed the facts in your appeal for reinstatement.

It is therefore, your reinstatement order Endst: No. 9120-25/CT/15 Dated: 15/12/2015 is hereby withdrawn from the retrospective date of reinstatement.

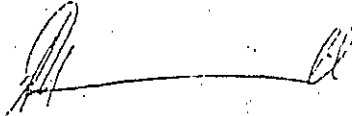
Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) D.I.KHAN

Dated 21/10/2016

Endst: 9648-53

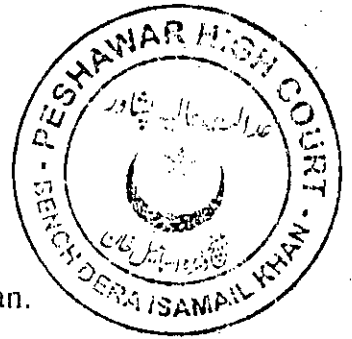
Copy forwarded to the:

1. The Registrar Peshawar High Court Bench, D.I.Khan.
2. The PS to the Secretary to Govt. Khyber Pakhtunkhwa, E&SE Department.
3. The Director Elementary and Secondary Education Department Peshawar.
4. The District Comptroller of Accounts, D.I.Khan.
5. The Advocate General Peshawar High Court, D.I.Khan.
6. The Candidate concerned.

  
 DISTRICT EDUCATION OFFICER  
(FEMALE) D.I.KHAN

**BEFORE THE PESHAWAR HIGH COURT**  
**D.I.KHAN BENCH.**

Contempt Petition 389-D/2016



Shazia Kiran D/O Inayatullah  
Cast Chinna R/O Busti ustrana North, Tehsil & District D.I.Khan.

.....(Petitioner)

Filed today 2832

Add: Peshawar.  
18/08/2016

Verstus

1. Mst. Azra Bibi, District Education Officer (Female) Dera Ismail Khan.
2. The District Education Officer (Female) Dera Ismail Khan.

.....Respondent

**CONTEMPT PETITION U/S 3 OF THE CONTEMPT OF COURT**  
**ACT READ WITH ALL ENABLING PROVISIONS FOR**  
**INITIATING CONTEMPT PROCEEDINGS AGAINST**  
**RESPONDENTS.**

Respectfully Shewith,

1. That the petitioner filed a writ petition No. 462 of 2009 against the respondent before the Honourable Peshawar High Court Bench D.I.Khan. Copy of the writ petition is enclosed herewith as Annexure-A.
2. That, on 27-11-2014, The Honourable Peshawar High Court, Dera Ismail Khan was pleased to pass the judgment in favour of the petitioner. Copy of the Judgment dated 27-11-2014 is enclosed as Annexure-B.
3. That the petitioner obtained copies of the order dated 27-11-2014, thereafter, on 26-01-2015, the petitioner went to the Respondent's Office and submitted an application along with orders dated 27-11-2014. The respondent is still silent upon the order of this Honourable Court and now the respondent clearly refused to obey the orders of this Honourable Court.

Grounds of COC No 389-D of 2016 title Shazia Kiran Vs Mst Azra Bibi

ATTESTED  
*WNA*  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan  
17-11-2017



4. That on 21/02/2015, the petitioner filed contempt petition against the EDO (Male) Mr. Riaz Sawati at that time he was having extra charge of EDO (F) Dera Ismail Khan. During pendency of Contempt Petition the EDO (F) present respondent No. 1 took charge of seat and issued fresh appointment order of petitioner in the light of judgment of this honourable Court dated 27/11/2014. Copies of the contempt petition, order dated 19/01/2016 and appointment order dated 15/12/2015 are enclosed as Annexure-C, C/1 & C/2 respectively.
5. That on 21/06/2016, the respondent, No. 1 withdrawn the order dated 15/12/2015, since the aforesaid order passed by this Honourable Court has been violated, the petitioner is left with no option but to invoke the powers vested in the Honourable Court for initiating contempt proceedings or other appropriate order thereon. Copy of withdrawal order dated 21/06/2016 is annexed as Annexure-D.
6. That respondents have been guilty of disobedience of the lawful orders passed by this Honourable Court and therefore, a penal action be initiated against respondents under the law.

It is therefore, respectfully prayed that proper contempt of court proceedings be initiated against the respondents.

Dated: 13/08/2016

led today 2832  
 (Signature)  
 Idl; Registrar.  
 13/08/2016

Your Humble Petitioner  
 Shazia Kiran  
 (Signature)  
 Through Counsel  
 (Signature)  
 Ameer Muhammad Khan  
 Baloch  
 Advocate Supreme Court

AFFIDAVIT

I, Shazia Kiran D/o Inayatullah Caste Cheena r/o Basti Ustrana North, the petitioner, do hereby solemnly affirm and declare on Oath that contents of the accompanying contempt petition are true and correct as communicated to me by my client and nothing has been deliberately concealed from this Hon'ble Court.

(Signature)  
 Deponent

Identified By:  
 (Signature)  
 Ameer Muhammad Khan  
 Advocate Supreme Court

12101-6611484-6

Grounds for Contempt No 389-D of 2016 title Shazia Kiran Vs Mst Azra Bibi

TESTED  
 EXAMINOR  
 Dera Ismail Khan  
 (Signature)  
 17-11-2016

JUDGMENT SHEET  
IN THE PESHAWAR HIGH COURT,  
D.I.KHAN BENCH  
(Judicial Department)

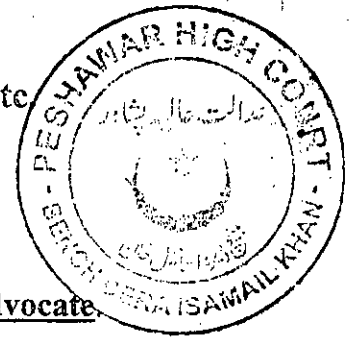
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Annexure 1/ Page

C.O.C. No.389-D/2016.

Shazia Khan  
Vs,  
Mst. Azra Bibi DEO Female, etc

JUDGMENT



For Petitioner: Muhammad Yousaf Khan, Advocate.

For Respondents: Mr. Adnan Ali Khan Asstt: A.G.  
alongwith Ms. Parveen Khattak, DEO.

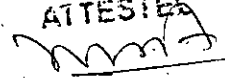
Date of hearing: 19.11.2018.

SHAKEEL AHMAD, J.- Same order as in writ petition  
bearing W.P. No.955-D of 2018, titled 'Rajab Naeem Vs.  
Govt. of Khyber Pakhtunkhwa, etc'.

Announced.  
Dt: 19.11.2018.

  
JUDGE

  
JUDGE

ATTESTED  
  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan  
17-11-2018

Kifayat/\*

(D.B) Hon'ble Justice Ijaz Anwar  
Hon'ble Justice Shakeel Ahmad

(30)

**JUDGMENT SHEET**  
**IN THE PESHAWAR HIGH COURT,**  
**D.I.KHAN BENCH**  
(Judicial Department)

W.P. No.955-D/2018 with  
C.M. No.1088-D/2018.

**Rajab Naeem**  
Vs.  
**Govt. of Khyber Pakhtunkhwa, etc.**



**JUDGMENT**

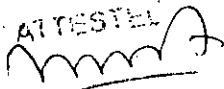
For Petitioner: Mr. Shah Fahad Ansari, Advocate.

For Respondents: Mr. Adnan Ali Khan Asstt: A.G.

Date of hearing: 19.11.2018.

SHAKEEL AHMAD, J.- Through this single order,  
we propose to decide the following writ petitions as well  
as contempt of Court petitions, as common question of  
law and facts are involved in all the petitions:-

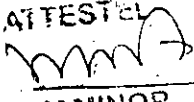
1. W.P. No.955-D/2018  
*Rajab Naeem Vs. Govt. of KPK, etc*
2. W.P. No.379-D/2018  
*Mst. Asifa Hina Vs. Govt. of KPK, etc*
3. W.P. No.926-D/2018  
*Mst. Amna Bibi Vs. Govt. of KPK, etc*
4. C.O.C. No.803-D/2017  
*Mst. Umaima Ayaz Vs. Parveen Khattak*
5. C.O.C. No.852-D/2018  
*Mst. Umaima Ayaz Vs. Zaib un Nisa Khattak;*
6. C.O.C. No.893-D/2018  
*Ambreen Vs. Zain un Nisa*
7. C.O.C. No.389-D/2016  
*Shazia Khan Vs. Mst. Azra Bibi, etc*
8. C.O.C. No.1108-D/2017  
*Khan Zaman Vs. Ms. Ghulam Fatima*
9. C.O.C. No.227-D/2018  
*Mst. Yasmin Bibi, etc Vs. DEO Female;*
10. C.O.C. No.525-D/2018  
*Gul Afshan Vs. Zaib un Nisa DEO, etc*

ATTESTED  
  
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Dera Ismail Khan  
17.11.2018

- 11. C.O.C. No.655-D/2018  
*Mst. Yasmeen Bibi Vs. Mst. Zaib un Nisa DEO;*
- 12. C.O.C. No.800-D/2018 with C.M. No.801 & 1059-D/2018.  
*Saman Zahra Vs. Zaib un Nisa DEO, etc.*

2. Facts, in brief, leading to filing of the above petitions are that pursuant to the recommendation of Departmental Selection Committee, the petitioners were appointed on different posts i.e. PST, CT etc in the Education Department on adhoc/contract basis under the existing policy of the Provincial Government. The petitioners assumed their duties in their respective schools. After expiry of the period of contract i.e. one year, the services of other appointees were extended but under similar circumstances, the petitioners were refused the same benefit. Not contented with the act of the respondents, the petitioners brought constitutional petitions before this Court, which were accepted and the respondents were directed to extend the services of the petitioners and in compliance of the order of this Court, the respondents extended the contract period of the petitioners. It also transpires from the record that after expiry of period of contract of the similarly placed employees, not only their period of contract was extended but, finally, vide notification dated 10.3.2018, the respondents regularized the services of the similarly placed employees, however, the petitioners were denied the same benefit and their services were not regularized,

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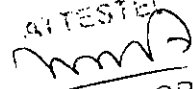
ATTESTED  
  
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 Peshawar High Court Bench,  
 Dera Ismail Khan  
 17.11.2021

rather show-cause notice was issued to the petitioners hence these petitions.

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3. We have heard the arguments of the learned counsel for the parties and perused the record with their able assistance.

4. Perusal of the record reveals that this Court has already allowed the writ petitions filed by the petitioners and directed the respondents to allow extension in service to the petitioner as per directives of the Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa circulated vide letter No.4028-53 dated 25.5.2015. Recently, the Provincial Government promulgated Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education (Appointment and Regularization of the Service) Act, 2018, whereby the employees appointed on adhoc/contract basis were regularized. The Elementary and Secondary Education Department, D.I.Khan vide Notification dated 10.3.2018, issued formal order of regularization of all similarly placed employees, but under similar circumstances, services of the petitioners were not regularized, rather the respondents issued show-cause notice to the petitioners. Article 25 of the Constitution of Islamic Republic of Pakistan, 1973, prohibits discrimination and states that rule of consistency must be followed in order to maintain balance and the

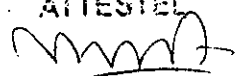
ATTESTED  
  
EXAMINOR  
Peshawar High Court Bench  
Dera Ismail Khan  
17-11-2017

doctrine of equality before law and that all the persons similarly placed should be treated alike. Perusal of the record further reveals that the petitioners were treated like a step-daughter/son and that they are repeatedly filing the writ petitions coupled with contempt of Court petitions for their yearly extension.

5. In view of the Khyber Pakhtunkhwa Employees of the Elementary & Secondary Education (Appointment and Regularization of the Service) Act, 2018, the respondents are bound to regularize the service of the petitioner in accordance with law and they cannot be discriminated against in any manner.

6. For what has been discussed above, this and the connected writ petitions are admitted and allowed, and the respondents are directed to extend the services of the petitioners and issue their formal regularization orders positively within a period of sixty (60) days of passing of this order, under intimation to Additional Registrar of this Court. The respondents made commitment that the orders of this Court in contempt petitions would be implemented in its letter and spirit, to which the learned counsel for the petitioners showed their satisfaction and requested for disposal of the COC petitions, which are disposed of accordingly. In case the respondents-contemnors do not comply with the orders of this Court, they shall be

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ATTESTED  
  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan  
17-11-2021

proceeded against in accordance with law. The office is directed to communicate attested copy of this judgment to the respondents for strict compliance.

34

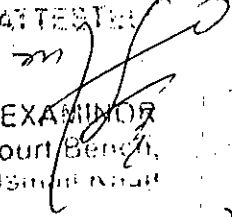
Announced  
Dt: 19.11.2018.  
Kifayat/\*

  
JUDGE

  
JUDGE

(D.B)  
Hon'ble Mr. Justice Ijaz Anwar  
Hon'ble Mr. Justice Shakeel Ahmad

*Office*  
*Juz/1*

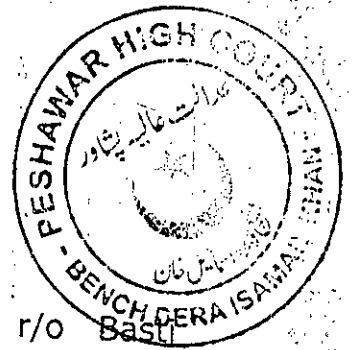
ATTESTED  
  
EXAMINOR  
Faisalwar High Court Bench,  
Dera Ismail Khan

17.11.2018

**BEFORE THE HONORABLE PESHAWAR HIGH COURT BENCH D.I.KHAN BENCH.**

C.M No. \_\_\_\_\_/2019

Contempt petition No 389-D /2016



**Shazia Kiran** D/o Inayatullah caste Chinna r/o Basti Ustarana North, District Dera Ismail Khan.

.....(Petitioner)

Versus

1. **Sayada Anjum**, District Education Officer (Female) Dera Ismail Khan.
2. District Education Officer (Female) Dera Ismail Khan.

.....Respondent

- A. CONTEMPT PETITION U/S 3 OF THE CONTEMPT OF COURT ACT READ WITH ALL ENABLING PROVISIONS FOR INITIATING CONTEMPT PROCEEDING AGAINST RESPONDENTS**
- B. IMPLEMENT PETITION TO ORDER IN CONTEMPT PETITION NO 389-D/2016 DATED 19-11-2018 PASSED BY HONORABLE PESHAWAR BENCH D I KHAN.**

**Respectfully Sheweth,**

- I. That the petitioner filed a writ petition No. 462 of 2009 against the respondent before the Honorable Peshawar High Court Bench D I Khan.
- II. That, on 27-11-2014, the Honorable court Peshawar High Court Bench D I Khan was pleased to pass the judgment in favor of the petitioner.
- III. That the petitioner Obtained copies of the order dated 27-11-2014, therefore, on 26-01-2015, the petitioner went to the respondents Office and submitted an application along with orders dated 24-11-2014. The respondent is still silent upon,

COC No.159-D of 2019 (Grounds)

*[Handwritten signature]*  
B.M. Khan

ATTEST  
*[Handwritten signature]*  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan

Filed today 2/12/19  
A  
Addl. Registrar  
02/12/19



the order of his Honorable Court and now the respondent clearly refused to obey the orders of this Honorable Court.

IV. That, on 21-02-2015 the petitioner filed contempt petition against the EDO (Male) Mr. Raiz Sawati at that time he was having extra charge of EDO(F) D I Khan. During pendency of Contempt Petition the EDO (F) present respondent No. 1 took charge of seat and issued fresh appointment order of petitioner in the light of judgment of this Honorable Court dated 27-11-2014.

V. That on 21-06-2016, the respondent No. 1 withdrawn the order dated 15-12-2015, since the aforesaid order passed by this Honorable Court has been violated, the petitioner is left with no option but to invoke the powers vested in the Honorable Court for imitating contempt proceedings or orders appropriate order thereon.

VI. That the petitioner filed contempt petition No. 389-D/2016 before the Honorable Peshawar High Court Bench D I Khan. Copy of the contempt petition is annexed as Annexure A.

VII. That on, 19-11-2018 The Honorable High Court Peshawar Bench D I Khan was placed to pass order in favor of petitioner. Copy of the order dated 19-11-2018 is annexed as Annexure B.

VIII. The respondents have been guilty of disobedience of the lawful order passed by this Honorable Court and therefore, a penal action be initiated against the respondent under the law.

It is therefore, respectfully prayed that proper under the law proceeding be initiated against the respondents.

Dated: 27/02/2019

Your Humble Petitioner  
S. Kiran  
Shazia Kiran  
Through Counsel

ATTEST:

EXAMINOR

COC No.159-D of 2019 (Grounds)

Peshawar High Court Bench,  
Dera Ismail Khan

17-11-2018

Filed today 24/3  
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Advt. Registrar  
02/02/19

C.O.C No.159-D/2020,

Reference COC 389-D/2016, Judgment Dated 19.11.2018  
Reference WP No. 462-D/2009, Judgment Dated 27.11.2014

Mst. Shazia Kiran VS

Syeda Anjum  
DEO (Female), DIKhan  
Government of Khyber Pakhtunkhwa etc.

REPLY ON BEHALF OF RESPONDENT

Filed today 09/11/2020  
Addr. Registrar.

Respectfully Sheweth:

1. That the respondent being a law abiding citizen and an obedient Civil Servant has never been willful doer of contempt to the worthy Orders of this Honourable Court.
2. That the humble respondent has already implemented the worthy judgment passed by this Honourable Court in Reference WP No. 462-D/2009, Judgment Dated 27.11.2014, Reference COC 389-D/2016, Judgment Dated 19.11.2018 by scrutinizing the petitioner for the question, "if the petitioner falls within the 1613 illegally appointed teachers?"
3. That the petitioner has already been served the final order in compliance to the Order of this Honourable Court as this Honourable Court disposed of Writ Petition Titled Hussan Ara vs Government of KPK, WP-No.252-D/2019 dated 11.06.2009 and ordered on implementation of the inquiry report.
4. That the respondent has inquired the matter through a high level inquiry/implementation committee, attended by the petitioner herself, along with her lawyer; the committee has forwarded their recommendation as detailed below:
  - I. As a brief history of the 1613 illegal appointments case (01.01.2007 to 30.06.2008);
    - a. That the Executive District Officer Schools & Literacy Department advertised call for applications for appointment of teachers on the vacant posts of PST and other cadres which published in newspapers on 07-04-2007. That the completion of procedural formalities was carried out only for 440 (309 male and 131 female) PSTs, who were appointed on merit under joint appointment order No. 12655-973 Dated 02.07.2007.
    - b. That The Provincial Assembly Khyber Pakhtunkhwa, on the Question No. 31 of Late MPA, Mr. Israrullah Gandapur Shaheed, constituted the Standing Committee No. 26 for Elementary and Secondary Education Department, dated 20-08-2008.
    - c. That the committee ibid scrutinized the case of appointments of the year 2007-08 and concluded that all the illegal appointee teachers during the period 01-01-2007 to 30-06-2008, be terminated from service, corrigendum to- "except 309 males and 131 females".
    - d. That in the 1613 illegal appointments, the case of petitioner, before issuance of the appointment orders, no merit list was made by office of the Executive District Officer for posting to the posts of CT teacher at District D.I.Khan. In fact, procedures were followed only for 440 PST Teachers (309 males + 131 females), as evident from Inquiry Committee report, page 65.)
    - e. That the Honourable Peshawar High Court disposed of Writ Petition Titled Hussan Ara vs Government of KPK, WP-No.252-D/2019 dated 11.06.2009 and ordered on implementation of the inquiry report.
    - f. That as a yard stick rule, if name of a teacher does not reflect in the PST joint appointment order No. 12655-973 dated 02.07.20107, and has the appointment order dated 1.1.2007 to 30.6.2008, is illegal like others, more than 1613 Teachers, whose appointment was found illegal under the recommendations of the Committee constituted

in light of direction of the Honourable Khyber Pakhtunkhwa Services Tribunal through its worthy judgment in Service Appeal No 1407 of 2010, Dated 27.10.2011.

- g. That the illegal appointees were then terminated by the then DCO, D.I.Khan, dated 04.09.2009. That this termination Order was stricken down by the Honourable Khyber Pakhtunkhwa Services Tribunal through its worthy judgment in Service Appeal No 1407 of 2010, Dated 27.10.2011.
- h. That few appellants impugned the Judgment of the Honourable Peshawar High Court before the August Supreme Court of Pakistan and the same was upheld; the case was ordered to be sent to the proper forum, the Khyber Pakhtunkhwa Service Tribunal, which was decided by the Honourable Tribunal vide its Worthy Order dated 27.10.2011. The case of these illegally appointed teachers was remanded to the department for personal hearing and resultantly a High Authority Inquiry was constituted.
  - i. That this inquiry committee personally heard those teachers who availed the opportunity and after that it was decided that if name of the teacher was not among the Joint Appointment Order, then his. Her appointment is illegal.
  - ii. That Keeping the same yardstick rule in mind, all the teachers who got appointed in the era 1.1.2007 to 30.6.2008 are to be considered illegal except the 131 females and 309 males who appeared in the Joint Appointment Order ibid of PSTs.
  - iii. That it is pertinent to mention that there were several illegally appointed teachers who tricked to escape the termination order issued by the Executive District Education officer as they simply did not attend the personal hearing held by the inquiry committee. These tricky and illegally appointed teachers either escaped the final termination order issued by the EDO E&SE or even there are few who even escaped both the Orders of termination.
- i. That, although, name of the petitioner was omitted in the Omni-Bus termination order issued by then Executive District Education Officer because she did not come before the inquiry committee and hence was not listed in the termination list ibid.
- j. That still an Appointment Order is to be considered illegal if it has been issued in the bogus appointment era of 1.1.2007 to 30.6.2008 and if it is not included to the joint appointment order of the 440 teachers (131 Females+309 Males).

II. The Petitioner Mrs. Shazia Kiran was served a questionnaire which was explained to her by the Chairperson and the petitioner was asked to fill in according to her knowledge, though, she was allowed to seek help of her brother who was allowed to sit in the next door room, the Clerk room of the same school, if needed. The questionnaire was duly completed by the petitioner in front of the committee, then she was asked to repeat each question with answer so as to avoid lest any ambiguity shall linger.

III. The personal hearing session testified the following facts:

- a) That the petitioner was first appointed dated 1.10.2007 as CT at GGMS Khutti, D.I.Khan.
- b) That the post of CT at GGMS Khutti was not vacant, hence, she could not assume charge on her place of appointment.
- c) That the petitioner was again appointed at GGMS Fateh dated ...../...../2007.
- d) That the petitioner was then terminated by the DCO, D.I.Khan, yet this termination was stricken down by the Honourable Peshawar High Court Judgment dated 7.4.2009 in WP 244-D/2008 and the case was remanded to the department for decision within 20 days or otherwise the right of filing another writ accrues to the petitioner.
- e) That the petitioner, thence, filed another Writ Petition No. 462-D/ 2009 that was decided on 24.11.2014. Para 12 of the worthy Judgment is reproduced here forth for ready reference:

"For the reasons mentioned hereinabove, this writ petition is accepted only to the extent that if her name is not included amongst those employees whose appointments were found illegal and irregular and were accordingly terminated, then her termination shall be treated as illegal and

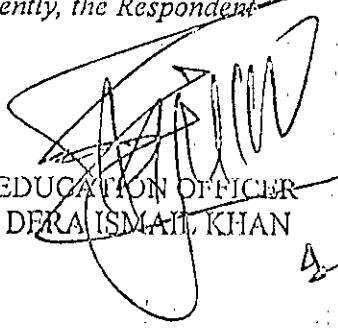
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 08/01/21

without any lawful authority and she be deemed to be in service of the Education Department D.I.Khan."

- Q That the attendance sheet of the 1613 inquiry reveals that the petitioner did not attend the inquiry Committee hence succeeded escape the Termination Order issued by the then EDO, Schools and Literacy, D.I.Khan dated 08.02.2012.
  - g) Also the petitioner could not provide a valid reason for not appearing before the earlier session of personal hearing dated 23.12.2011, at D.I.Khan. Circuit house (in pursuance to the Judgment of Khyber Pakhtunkhwa Service Tribunal in S.A No.1407 / 2011, dated 27.10.2011)
  - h) That the petitioner expressed her ignorance about news of the call for personal hearing whereas the whole city was red with the news.
  - i) That the petitioner was asked to provide, then or later, the first, second Appointment Order and the successive orders communicated or issued in respect of her by the DCO or EDO Schools and Literacy thereafter, but she failed to comply with the same.
5. That the Contempt of Court Petition, against the respondent may kindly be dismissed because the petitioner has committed the guilt of corruption and usurped salaries from the Government exchequer and that she concealed material facts from this Honourable Court.
  6. That the petitioner was not aggrieved in light of the Article 199 of the Constitution of Islamic Republic of Pakistan.

In view of above submission, it is humbly prayed that contempt petition may kindly be dismissed and, for the guilt of corruption and concealment of facts from this Honourable Court, the contempt proceeding may kindly be initiated against the petitioner.

Yours obediently, the Respondent



DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN

Filed today 09/11/11  
 Addl: Registrar  
 09/11/11

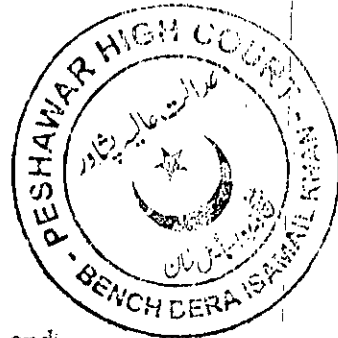
**JUDGMENT SHEET**  
**IN THE PESHAWAR HIGH COURT, D.I.KHAN BENCH**  
(Judicial Department)

C.O.C.No.159-D of 2019

Shazia Kiran

Versus

Sayada Anjum, DEO (F), D.I.Khan



**JUDGMENT**

For petitioner: M/S Muhammad Yousaf Khan and  
Motiullah Rind, Advocates.  
For respondent: Mr. Kamran Hayat Miankhel, Addl: A.G.  
Date of hearing: 26.10.2021

ABDUL SHAKOOR, J.- Through the instant petition, the petitioner seeks initiation of contempt of Court proceedings against the respondent and also implementation of order dated 19.11.2018 in C.O.C.No.389-D/2019.

2. The brief facts giving rise to the instant petition are that initially the petitioner had filed W.P.No.462 of 2009 which was allowed vide judgment dated 27.11.2014 in the following terms:-

*"For the reasons mentioned hereinabove, this writ petition is accepted only to the extent that if her name is not included amongst those employees, whose appointments were found illegal and irregular and were accordingly terminated, then her termination shall be treated as illegal and without any lawful authority and she be deemed to be in service of the Education Department, D.I.Khan."*

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ATTESTED

EXAMINOR

Peshawar High Court Bench,  
Dera Ismail Khan

17.11.2021

3. In compliance with the judgment of this Court dated 27.11.2014, the petitioner was appointed afresh vide order dated 15.12.2015 which was withdrawn vide order dated 21.6.2016, therefore, the petitioner filed C.O.C.No.389-D/2016. Vide judgment dated 19.11.2018, this Court disposed of twelve matters including C.O.C.No.389-D/2016 by directing the respondents to extend the services of the petitioners and issue their formal regularization orders positively within a period of sixty days. The petitioner submitted an application dated 07.01.2019 before the respondent for implementation of the order dated 19.11.2018 but in vain, hence the instant C.O.C.

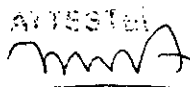
4. We have heard the arguments of learned counsel for the petitioner and the learned Additional Advocate General representing the respondent and have gone through the record.

5. The basic order in the instant matter is the judgment of this Court dated 27.11.2014 in W.P.No.462/2009. In para-11 of the judgment, it was observed by this Court that:-

*"On direction of this Court dated 25.3.2014, the learned Additional Advocate General provided the termination order of 1613 employees who were terminated by the competent authority thereafter proper inquiry in regard to their appointments, however, with careful scrutiny of the said order, the name of the petitioner is not found amongst the terminated employees."*

and therefore, the writ petition was accepted only to the extent that if her name is not included amongst those employees, whose

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ATTESTED  


EXAMINOR,  
 Peshawar High Court Bench,  
 Dera Ismail Khan

17.11.2017


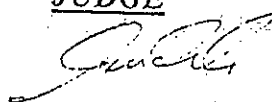
(42)

appointments were found illegal and irregular and were accordingly terminated; then her termination shall be treated as illegal and without any lawful authority and she be deemed to be in service of the Education Department. Meaning thereby that as per judgment of this Court, the treatment of petitioner's termination order was held to be illegal subject to scrutiny. At present, the petitioner is aggrieved from the order dated 31.12.2019, whereby her services were terminated. The order dated 31.12.2019 is in detail and has been passed after thorough scrutiny which was the spirit of judgment of this Court dated 27.11.2014. Such being the position, the petitioner could not make out a case for initiating contempt of Court proceedings against the respondent. However, the petitioner may move the proper forum seeking setting aside of order dated 31.12.2019.

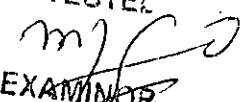
6. For the reasons mentioned above, the instant petition is disposed of accordingly.

Announced.  
Dt: 26.10.2021.  
Habib/\*

*Alia*  
*29/X*

  
JUDGE  
  
JUDGE

(DB)  
 Hon'ble Mr. Justice Abdul Shakoor  
 Hon'ble Mr. Justice Sahibzada Asadullah

ATTESTED  
  
 EXAMINOR  
 Pesnawar High Court Bench,  
 Dera Ismael Khan  
 47-11-2021



Annexure J Page 43  
**OFFICE OF THE DISTRICT EDUCATION OFFICER**

(FEMALE) DERA ISMAIL KHAN

Phone No. 0966-9280133, emisfdikhan@gmail.com

**NOTIFICATION.**

WHEREAS, in compliance with the Worthy Order by the Honourable Peshawar High Court, D.I.Khan Bench in WP No.462-D/2009, filed by, You, the petitioner, Mst. Shazia Kiran d/o Inayatullah, Ex-CT, GGMS Khutti, GGMS Fateh, GGMS Miali, judgment dated: 27.11.2014, and COC 389-D/2016, I, Mrs. Syeda Anjum, DEO (Female), D.I.Khan constituted an Inquiry/ Assessment Committee vide this Office Letter No.6951-62, dated: 30/3/2019, D.I.Khan to see if you fall among the 1613 illegally appointed teachers?

AND WHEREAS, you personally appeared before this Committee, in the same meeting dated 10.06.2019, at office of the Principal GGCMHS No.1 D.I.Khan for the personal hearing to avail the second opportunity for if you could convince the committee on the point that your name do not fall among the 1613 illegally appointed teachers as stated by the Standing Committee No.26 for Elementary and Secondary Education Department, constituted dated 20-08-2008 and the Honourable Peshawar High Court ordered on implementation of the inquiry report when disposing of Writ Petition Titled Hussan Ara and others vs Government of KPK, WP-No.252-D/2019 dated 11.06.2009.

AND WHEREAS, you could not provide a valid reason for not appearing before the earlier session of personal hearing dated 23.12.2011, at D.I.Khan Circuit house (in pursuance to the Judgment of Khyber Pakhtunkhwa Service Tribunal in S.A No.1407/2011, dated 27.10.2011) as the attendance sheet of the 1613 inquiry reveals that you did not avail the earlier opportunity of personal hearing and did not attend the inquiry Committee hence succeeded escape the Termination Order issued by the then EDO, Schools and Literacy, D.I.Khan dated 08.02.2012.

AND WHEREAS, acceding to the report forwarded by Office of The Chairperson Assessment/ Inquiry Committee, Principal GGCMHS No.1, D.I.Khan, I am satisfied to assert that your first appointment order falls among the 1613 illegally appointed teachers in the period 07.07.2007 to 30.06.2008 and the same has been communicated to you earlier vide this Office letter No. 12128-30, dated 14.04.2015.

NOW THEREFORE, I, Mrs. Syeda Anjum, District Education Officer (Female) D.I.Khan, being Competent Authority, hereby set aside, being invalid, the first and the consequent appointment orders from the date of its issue and terminate services of Mrs. Shazia Kiran, ex-CT, GGMS Khutti, GGMS Fateh, GGMS Miali, from the starting date, in the best interest of public.

9/6/2028 21/6/19  
DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN

Endst. No. 28235-39

Dated, D.I.Khan, the 31/12/2019

Copy is forwarded to the:-

1. Director, Department of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. Litigation Wing, O/o DEO (Female), D.I.Khan.
3. The Petitioner, Mrs. Shazia Kiran.
4. PA to DEO (Female), D.I.Khan.
5. Master Copy.

DISTRICT EDUCATION OFFICER  
(FEMALE) DERA ISMAIL KHAN



To,

The Secretary Education,  
Khyber Pakhtunkhwa, Peshawar

Subject

PRESENTATION / DEPARTMENTAL APPLICATION

Respected Sir,

Applicant submits as under,

1. That the applicant was appointed as a C.T in the year 2007, after appointment the DCO D.I.Khan terminated the applicant. The applicant filed writ petition against the order of the DCO D.I.Khan. Writ petition was accepted/ allowed by the Peshawar High Court Bench, D.I.Khan in favor of applicant. But the defendant ignored the judgment. The applicant submitted contempt of court, during proceeding of COC the department produced appointment order of the applicant before the court. Copies of the writ petition, COC & order are appended with.
2. That after 6 months the department has withdrawn appointment order of the applicant. The applicant submitted another COC against the education department. The District Education Officer appeared before the court and conceded the COC, which was allowed. Copies of the COC & order are appended with.
3. That the Officers of the education department refused/ not obeying the order of the Peshawar High Court Bench, D.I.Khan. The applicant submitted another COC, while at the time of final arguments. District Education Officers submitted new termination order. The Peshawar High Court directed the applicant to approach proper forum. Copies of the COC & order are appended with.
4. That the applicant got knowledge of his removal from service/termination on 26/10/2024 at the time of final arguments of COC. The representation/departmental appeal after knowledge is well within time.

5. That the removal order is against law, facts and deserves to be set aside and applicant may graciously be restored to his service.

*It is, therefore, respectfully prayed that service of the applicant may kindly be restored thereby reinstating the applicant in service with full back benefits.*

Dated: 23-11-2021

Yours obediently,

*Shazia Kiran*  
Shazia Kiran  
w/o Sami Ullah,  
R/O Basti Ustrana North  
District Dera Ismail Khan

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# DCS DELTEX COURIER SERVICE

DOMESTIC & INTERNATIONAL COURIERS  
DERA ISMAIL KHAN. PH: 0966-717907

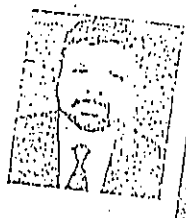
CLIENT/PROID. NO.	ORIGIN D.I.K	DESTINATION	C.N. 993940	WEIGHT	PIECES
FROM: (SHIPPER) <i>Sana Khan</i> DERA ISMAIL KHAN		TO: (CONSIGNEE) <i>Secretary</i> 736240		DOC	PARCEL
				<b>CHARGES</b>	
				Wt. Charges	
				G. ST. #	
				<b>TOTAL</b>	
				NO VALUE DECLARED	
<b>COLLECTION INFORMATION</b>			<b>DELIVERY INFORMATION</b>		
Courier Code	Date	SIG.	Receiver Name	Date	Time
				15/11/11	
				Shipper Signature	

**TERMS & CONDITIONS:** 1. DCS has right to inspect any shipment. 2. Liability of DCS for any loss or damage of shipment shall in no way exceed a maximum amount of 100 per shipment. 3. DCS shall not be liable in any event for any consequential or special damage or other indirect losses how ever arising, weather are not DCS acknowledged that such might be incurred including, but not limited to, loss of income, profit, interest, utility or loss of market. 4. While DCS will endeavor to expedite its best efforts to provide expeditious delivery however DCS will not, under any circumstances, be liable for delay in pickup, transportation or delivery of any shipment. Further, DCS shall not be liable for any loss, damage, misroute because of act of God, force majeure or any other happening reasonably beyond the control of DCS. 5. DCS has policy of progressive destruction of its records pertaining to shipment of any item. Any claim regarding a shipment must, therefore be lodged by the shipper with DCS, in writing, within the maximum period of 90 days from the date of the relevant shipment, otherwise no claim will be accepted. 6. Proof of delivery will be provided on request within 30 days from the date of shipment after 90 days DCS will not be responsible for providing the proof of delivery. 7. DCS is not responsible for loss of or damage to any item, including but not limited to, fragile, perishable, hazardous, flammable, explosive, radioactive, corrosive, toxic, flammable, or otherwise prohibited by any law of the Federal Government of Pakistan. If the above noted items are handed over to DCS by any shipper by giving a false statement, DCS shall not be responsible for the loss/misplace of such item. 8. All shipments are insured by the shipper. Insurance is not provided by DCS. 9. DCS is not responsible for any loss or damage to any item, including but not limited to, fragile, perishable, hazardous, flammable, explosive, radioactive, corrosive, toxic, flammable, or otherwise prohibited by any law of the Federal Government of Pakistan. If the above noted items are handed over to DCS by any shipper by giving a false statement, DCS shall not be responsible for the loss/misplace of such item. 10. DCS is not responsible for any loss or damage to any item, including but not limited to, fragile, perishable, hazardous, flammable, explosive, radioactive, corrosive, toxic, flammable, or otherwise prohibited by any law of the Federal Government of Pakistan. If the above noted items are handed over to DCS by any shipper by giving a false statement, DCS shall not be responsible for the loss/misplace of such item.

بھارت کی حکومت اور پاکستان کی حکومت کے درمیان ہونے والے تجارتی لین دین کے لیے استعمال ہونے والے اس پر مشتمل اس کاغذ کو استعمال کرنے سے پہلے اس پر مشتمل شرائط و ضوابط کو پڑھیں اور اس پر عمل کریں۔

MUJIB ULLAH

Advocate  
No-09-1926  
Date of issue: August 2020  
Valid upto: August 2022



KHYBER PAKHTUNKHWA BAR COUNCIL

کورٹ  
فیصل

Before the Khyber Pakhtunkhwa Service Tribunal  
Appellant  
Shajia Usan vs Govt of KP etc

Appeal

باعتراض

مقدمہ درج بالا نمبران میں اپنی طرف سے دائر کی جاتی ہے جس کی تاریخ 28/08/2020 ہے

Muhammad Rind Advocate High court

کو حسب ذیل شرائط پر وکیل مقرر کیا گیا ہے کہ میں اپنی طرف سے دائر کی جاتی ہے جس کی تاریخ 28/08/2020 ہے اور مقدمہ میری غیر جانبداری کی وجہ سے کسی طور پر سے خلاف ہو گیا تو صاحب  
موصوف میں سے کسی طرح لاء وار نہ ہونے کے نیز وکیل صاحب موصوف پر مقدمہ میری غیر جانبداری کے خلاف ہو گیا تو صاحب موصوف میں سے کسی طرح لاء وار نہ ہونے کے  
مقدمہ میری غیر جانبداری کی وجہ سے کسی طور پر سے خلاف ہو گیا تو صاحب موصوف میں سے کسی طرح لاء وار نہ ہونے کے نیز وکیل صاحب موصوف پر مقدمہ میری غیر جانبداری کے خلاف ہو گیا تو صاحب موصوف میں سے کسی طرح لاء وار نہ ہونے کے  
مقدمہ میری غیر جانبداری کی وجہ سے کسی طور پر سے خلاف ہو گیا تو صاحب موصوف میں سے کسی طرح لاء وار نہ ہونے کے نیز وکیل صاحب موصوف پر مقدمہ میری غیر جانبداری کے خلاف ہو گیا تو صاحب موصوف میں سے کسی طرح لاء وار نہ ہونے کے

2022 2/17

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مشورون و کالت نامہ نمبر 1 اور ان کی طرح کی لیا اور منظور ہے

Accepted  
Attended

تیار ہو کر لیا گیا ہے  
Shajia Usan