

28.09.2022

Learned counsel for the appellant present. Dr. Muhammad Imran, Subject Specialist alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and sought further time for submission of reply. Last opportunity given. To come up for submission of reply as well as preliminary arguments on 26.10.2022 before the S.B at Camp Court D.I.Khan.



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

26th Oct 2022

None for the appellant present. Mr. Kabirullah Khattak,
Addl: AG for respondents present.

Lawyers are on strike today. To come up for Preliminary hearing on 22.11.2022 before S.B at camp court D.I.Khan. P.P given to the parties.



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

13.10.2021

None for the appellant present.

Notices be issued to the appellant and his counsel.
Adjourned. To come up for preliminary hearing before the S.B
on 09.12.2021.


(MIAN MUHAMMAD)
MEMBER (E)

09.12.2021


Nemo for the appellant. Notice for prosecution of the appeal
be issued to the appellant as well as her counsel and to come up
for preliminary hearing on 04.02.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

27th June 2022

Learned counsel for the appellant.

Let pre-admission notice be issued to the respondents for
written reply. To come up for written reply/preliminary
arguments on 27.07.2022 before S.B at camp court D.I.Khan.


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

27-07-2022

Due to summer vacations, the case
is adjourned to 28-09-2022 for
the same as before.



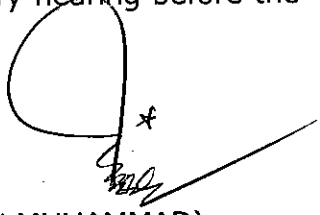

Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 7049 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/07/2021	<p>The appeal of Mst. Humaira Khatoon resubmitted today by post through Malak Hidayatullah Malan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>01/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	01.09.2021	<p>Clerk of counsel for the appellant present.</p> <p>Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel is not available today. Adjourned. To come up for preliminary hearing before the S.B on 13.10.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. 7049 /2021

Humaira Khatoon
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

INDEX

S.No.	Description of document	Annexure	Pages
1	Service Appeal with affidavit	--	1-6
2	Copy of appointment order and CNIC of appellant	A & B	7-9
3	Copy of promotion order	C	10-11
5	Copy of Departmental appeal & postal receipt	D & E	12-14
6	Wakalatnama	--	15

25/05/2021

Your humble appellant,
Humaira Khatoon
Humaira Khatoon
Through counsel:-

Malik Hidayatullah Malana
Malik Hidayatullah Malana
Advocate High Court

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Humaira Khatoon

SPET Govt. Girls High School Malana, Dera Ismail Khan.

.....(**APPELLANT**)

VERSUS

1. Government of KPK; Through Secretary Elementary & Secondary Education Peshawar
2. The Director (E &S) Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (F) Dera Ismail Khan.
4. District Accounts Officer, Dera Ismail Khan.

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

**APPEAL UNDER SECTION 4 OF THE NWFP
SERVICES TRIBUNAL ACT, 1974.**

PRAYER

On acceptance of this appeal the respondents may kindly be directed to include the name of appellant may kindly be included in the seniority list of PET from her first appointment i.e. 24/06/1997 to meet the ends of justice and equity.

Respectfully Sheweth;

The appellant humbly submits as under;

1. That the appellant was appointed as PET (Untrained) BPS-09 vide appointment order dated 24/06/1997 after fulfillment of

Humaira Khatoon

all legal and codel formalities and since then the appellant is serving in the department to the entire satisfaction of high-ups. Copy of appointment order and CNIC are annexed as **Annexure-A&B.**

2. That the appellant has served the department with whole heartedly and with great zeal and no complaint whatsoever has been made against the appellant which is evident from her service record.
3. That the service of appellant was regularized vide letter dated 29/06/2002 and thereafter the appellant was also promoted time to time due to her good performance in the department and now appellant is serving as SPET (BPS-16) at GGHS Malana Dera Ismail Khan. Copy of promotion order of appellant is annexed as **Annexure-C.**
4. That the Education Department Dera Ismail Khan prepared a Seniority list of PET/SPET in which the period of untrained teacher of the appellant has not been included by the concern department without any cogent reasons.
5. That the appellant was appointed on 24/06/1997 and since then served the department with great zeal and zest, hence, the name of appellant is entitled to be included in the seniority list from first date of appointed i.e. 24/06/1997.
6. That the appellant, time and again, requested the quarter concerned through verbal as well as written requests to include the name of appellant in the seniority list of PET from her first appointment but due to the lethargic conduct of the quarter concerned, the requests has been shuffling from desk to desk and the rights guaranteed to the appellant are being violated by the department.
7. That appellant being aggrieved person filed a departmental appeal/representation on 23/05/2017 being appellate authority. Copy of D.A & postal receipt is annexed as **Annexure-D&E.**

Handwritten signature/initials

8. The appellate authority did not decide the representation of the appellant regarding grievances as yet, hence, the appellant has a right and cause of action to file the instant service appeal before this Honourable Service Tribunal, inter alia, on the following grounds.

GROUND

- a. That the appellant was appointed on 24/06/1997 and since then served the department with great zeal and zest, hence, the name of appellant is entitled to be included in the seniority list from first date of appointed i.e. 24/06/1997.
- b. That in view of the seniority position of appellant, his hard work and better performance in Education Department as also in view of his laudable and favourable and be treated on equality.
- c. That non awarding promotion from the initial appointment i.e. 24/06/1997 to the appellate cost an adverse effect upon her entire career which badly resulted his expected ancillary benefits thereon.
- d. That non-promotion of appellant from her first appointment i.e. 24/06/1997 has brought a bleak disaster not only to her impeccable career but also has financially straightened.
- e. That petitioner was entitled for the promotion with effect from 24/06/1997 because respondents issued of promotion of the petitioner on 29/06/2002 which is clear violation of the policy of Government.

CCM/12/1

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- f. That the appellant has been discriminated in the matter of promotion and as the said discrimination smacks of malafides, the impugned act of respondents is merit annulment.
- g. That counsel for the appellant may kindly be permitted to raise additional grounds at the time of arguments.

For the afore-stated grounds, this appeal may please be allowed as prayed above.

Dated 25/05/2021

Your humble appellant,

Humaira
Khatoon

Humaira Khatoon

Through counsel:-

Malik Hidayatullah Malana
Advocate High Court

Malik Hidayatullah Malana
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. _____/2021

Humaira Khatoon
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

AFFIDAVIT

I, **Humaira Khatoon** SPET Govt. Girls High School Malana, Dera Ismail Khan, appellant herein, do hereby solemnly affirm on oath that all parawise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal, nor anything contained therein is based on exaggeration or distortion of facts.

Dated: 25/05/2021

Humaira Khatoon

Deponent

VERIFICATION

Verified on oath at DIKhan, this ___ day of May, 2021, that all contents of the above appeal are true and correct.

Dated: 25/05/2021

Humaira Khatoon

Appellant

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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

In Service Appeal No. _____/2021

Humaira Khatoon
(Appellant)

Versus

Govt Of KPK, etc
(Respondents)

ADDRESSES OF PARTIES

Humaira Khatoon

SPET Govt. Girls High School Malana, Dera Ismail Khan.

.....**(APPELLANT)**

1. Government of KPK, Through Secretary Elementary & Secondary Education Peshawar
2. The Director (E &S) Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (F) Dera Ismail Khan.
4. District Accounts Officer, Dera Ismail Khan.

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

NOTIFICATION.

Annex 'A'

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Consequent upon their selection by the Departmental Selection Committee, the Divl: Director of Education (Schools) DIKHAN DIVIMBDRKANN. HAS BEEN PLEASED TO APPOINT the the following PET (Untrained) at the school noted against their names in BPS-9 (1605-97=3060) plus usual allowances admissible under the rules with immediate effect subject to the condition (Fixed)

S.No.	Name of Candidate	D/O Birth.	No of Merit/Marks.	School	Remarks
1.	Humara Khatoon D/O Amjad Ali DIKhan.	14-4-76	1/60	GGMS-Gomal Bar DIKhan.	V/Post.
.	Nadia Shaheen D/O Iitabar Shah R/O Tariq Abad DIKhan.	6-12-75	2/45	GGHS Husazai DIKhan.	V/Post.
3.	Safina Yasmin D/O Mohd:Sattar.	10-4-74.		GGMS-Pai DIK.	V/Post.

TERMS AND CONDITION.

1. They will be governed by such rules and regulation as may prescribed by the Govt; fromtime for the category of the Govt;servant to which they belong.
2. Their service will be liable to termination on one Month notice from either side .In case resignation with out notice one month pay will be forfeited in lieu their of.
3. They should join the post with in one month of this notification.
4. Their inter seniority will be determined in accordance with merit of the dept; selection committee .
5. Charge reports should be submitted to all concerned..
6. They shall be on prepeation for period of the years and have to pass Departmental Examination. If he fail again then her service will be terminated of untrianed teachers accopied the post will be terminated.
7. Th original Certificate /Degree should be cheked and verify from the concerned university /BISE/RDE and Islaska Masddresa concerned be fore the date of handing over cahreg.
8. The service Books of th teacher concerned must be completed in all respect before the handing over charge.
9. The delelration of Assett: Should be obtained from the immediately and placed on record.
10. They are required to produced health abd age certificate from the medical supdt; concerned. before taking over charge.
11. Charge reports should be submitted to all concerned.
12. Efforts for transfer before the completion of tenure will disualified her from the service.
13. O:TA/DA ia allowed.
14. Maundertaking should be obtained from master and degree holder PPC CT etc that they t;at they will service the department for at least 5-Years unless he ia is selected by PSC for any post.
15. Her service will be terminated if her saned /certificate/Bougassat any time and ac avtion i;ia be taken against her according to the rules.

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... requisite training examination within period of 4 years failing which her services will be terminated.

Complete information of each category (separately) in consolidated lists on the prescribed proforma attached along with charge reports be sent by the lower office to the DSE/DEO with a week positively.


-Sd=

ABDUL WASI KHAN.
DIVIL: DIRECTOR OF EDUCATION,
(SCHOOLS) DIKHAN DIVIN: DIK.

Ends: NO 174-173 3 AE-I dated DIKhan the 24-6-3 1997.

Copy to the:-

- 1- Accountant Gernal NWFP, Peshawar.
- 2- Director of Education Schools) NWFP, Peshawar.
- 3. Distt; Accounts Officer Concerned.
- 4. Distt; Education Officer Concerned.
- 5. Principals/ Headmistress Concerned.
- 6. PPS to Minister for Education NWFP, Peshawar.
- 7. Official Concerned.


BY: DIRECTOR (SCHOOLS),
(SCHOOLS) DIKHAN DIVIN: DIKHAN.

PAKISTAN National Identity Card

Name: Humaira Khatoon

Amor B

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Husband's Name: Sibghatullah



Gender: F Country of Birth: Pakistan

Identity Number: 1210172037460-01

Date of Birth: 12-04-1976

Date of Issue: 22-01-2017

Date of Expiry: 22-01-2027

Holder's Signature

Humaira Khatoon

HEAD MISTRESS
EGHS RAMAK, DIKMAN

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Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

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Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SC(B&A)/1-18/ES/SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female PETs B-15 are hereby promoted to the post of Senior PET BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior PET BPS-16 posts:-

Total No. of PET (F) Posts duly verified by the DAO	147
1/3 share of Senior PET Posts	42
Share of promotion 100%	42
Promoted to the post of Senior PET B-16	39
Deferred for Promotion	03

S. No	S. No	Name Of Mistress	Place Of Posting	DATE OF BIRTH	PLACE OF POSTING
1	2	Kaniz Akhter	GGCMS No. 1 Dikhan	30-12-1954	Services placed at the disposal of DEO (F) D-I Khan for further posting.
2	5	Irshad Bibi	GGMS Himat	01/02/1954	Do
3	7	Dilshad Akhtar	GGMS Karri Ali Zai	14-08-1960	Do
4	9	Sajila Nasreen	GGHSS No. 6 Dikhan	21-09-1958	Do
5	12	Musarat Riaz	GGHS Jand Karsai	13-05-1959	Do
6	14	Yasmin Kausar	GGHS D/Khurad	30-12-1962	Do
7	19	Shehraz Farzana	GGMS Madne Tawon	16-10-1962	Do
8	23	Kishwar Sultana	GGMS Kalachi Wala	22-01-1967	Do
9	43	Farzana Shaheen	GGMS Wanda Mochiani Wala	14-01-1972	Do
10	26	Syda Zeshan Zahra	GGMS Chah Mughal	07/07/1973	Do
11	29	Safina Yasmeen	GGMS Jhok Qureshian	04/10/1974	Do
12	25	Shehla Iqbal	GGMS Lakhrai	29-11-1975	Do
13	27	Khala Siddiqi	GGMS Aail Sipra	02/12/1970	Do
14	33	Aminia Bibi	GGHS FRC Dikhan	13-02-1975	Do
15	28	Humaria Khatoon	GGHS K. Shamoza	14-04-1976	Do
16	31	Shereen Salma	GGMS, Gandhi Umar Khan	11/12/1966	Do
17	30	Sadaf Saeed	GGHS Naiwala	01/06/1971	Do
18	32	Nadia Shaheen	GGMS Malang Abad	12/06/1975	Do
19	34	Riffat Bibi	GGHS No. 8 Dikhan	13-03-1973	Do
		Beenat Perveen	GGMS Kashkori	09/01/1974	Do

Attested
Jawid
Kofia
Head Mistress
GGHS Ramak D.I. Khan

Attested
Jawid
Kofia
Head Mistress
GGHS Ramak D.I. Khan

Attested
Jawid
Kofia
Head Mistress
GGHS Ramak D.I. Khan

21	36	Rizwana Kamwal	GGHS D/Kalan	15-10-1975	---Do---
22	37	Uzma Nisar	GGMS, Chah Khan Wala	11/04/1975	---Do---
23	38	Gul-E-Nargis	GGMS Chah Barewala	06/01/1976	---Do---
24	39	Hussan Bano	GGMS Shore Kot	09/12/1976	---Do---
25	40	Uzma Rehman	GGMS Nad Ali Shah	05/05/1977	---Do---
26	41	Shazia Nazneen	GGMS Athog	06/08/1977	---Do---
27	42	Mudisar Nisar	GGHS s.No.5 Dikhan	14-08-1977	---Do---
28	44	Sadaf Ambreen	GGHS Panila	28-04-1976	---Do---
29	45	Tahira Jabeen	GGCMHS No1 Dikhan	01/10/1977	---Do---
30	46	Sadia Bilquees	GGMS, Rehmani Khel	25/04/1981	---Do---
31	47	Saira Nawaz	GGMS Ruknaw	02/02/1978	---Do---
32	48	Shazia Ambreen	GGHSS Kulachi	09/06/1977	---Do---
33	49	Afshan Kanwal	GGHS Hathala	13-04-1981	---Do---
34	50	Nausheen Mandiwar	GGHS K.Pand Khan	16-01-1981	---Do---
35	51	Afshan Sattar	GGMS Haji Mora	04/01/1976	---Do---
36	52	Husan Ara	GGMS Babbar Paka	24-03-1983	---Do---
37	53	Patwasha Karim	GGMS Panila	04/05/1984	---Do---
38	54	Robina Babar	GGHS Fateh	03/01/1982	---Do---
39	55	Tayaba Humra	GGHSS Paroa	09/03/1985	---Do---

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, the shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Ser seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining her duty.
- 7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to her in light this order will be recovered and if she is wrongly promoted she will be reversed.

(Muhammad Rafiq Khattak)
 Director
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar.

Endst: No. / File No.1/Promotion Senior PET B-16: Dated Peshawar the 21/02/2013.

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. District Education Officers (F) D.I Khan.
 3. District Accounts Officer D.I Khan.
 4. Official Concerned.
 5. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
 6. RA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
 7. M/File.

District Education Officer
 (Female), Dera Ismail Khan

Dy: Director Estab. (Female)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

Annex: "D"

(12)

To

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

THROUGH PROPER CHANNEL

**DEPARTMENTAL APPEAL/REPRESENTATION TO INCLUDE THE
NAME OF APPELLANT IN THE SENIORITY LIST OF SPET
PREPARED BY THE EDUCATION DEPARTMENT DERA ISMAIL
KHAN.**

Respected Sir;

Applicant humbly submits as under;

1. That the appellant was appointed as PET (Untrained) BPS-09 vide appointment order dated 24/06/1997 after fulfillment of all legal and code formalities and since then the appellant is serving in the department to the entire satisfaction of high-ups. Copy of appointment order and service card are enclosed herewith.
2. That the appellant has served the department with whole heartedly and with great zeal and no complaint whatsoever has been made against the appellant which is evident from her service record.
3. That the service of appellant was regularized vide letter dated 29/06/2002 and thereafter the appellant was also promoted time to time due to her good performance in the department and now appellant is serving as SPET (BPS-16) at GGHS Malana Dera Ismail Khan. Bio-Data of appellant is annexed.
4. That the Education Department Dera Ismail Khan prepared a Seniority list of PET/SPET in which the period of untrained teacher of the appellant has not been included by the concern department without any cogent reasons.
5. That the appellant was appointed on 24/06/1997 and since then served the department with great zeal and zest, hence, the

name of appellant is entitled to be included in the seniority list from first date of appointed i.e. 24/06/1997.

- 6. That the appellant, time and again, requested the quarter concerned through verbal as well as written requests to include the name of appellant in the seniority list of PET from her first appointment but due to the lethargic conduct of the quarter concerned, the requests has been shuffling from desk to desk and the rights guaranteed to the appellant are being violated by the department.
- 7. That in view of the seniority of appellant, her hard work and better performance in Department as also in view of her laudable and favourable and be treated on equality.
- 8. That the appellant has been discriminated in the matter of seniority and as the said discrimination smacks of malafides, the impugned act of quarter concerned is merit annulment.

Prayer:

It is, therefore, requested that the name of appellant may kindly be included in the seniority list of PET from her first appointment i.e. 24/06/1997 to meet the ends of justice and equity.

Dated: 25/01/2021

Your Humble Appellant

Humaira Khatoon

Humaira Khatoon
SPET, GGHS Malana
Dera Ismail Khan
Cell # 0349-9150991

RGL52765174

Annex E (14)

Postage stamps affixed except in case of uninsured letters of not more than the limit weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Sender's Name: S. S. S. S. S.

Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.
Rs. (in figures) 10 (in words) ten

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Kilo: 0 }
Rs. 10 Ps. 00 }
and 100 }
ess- 00 }
nder 00 }



وکالت

MALIK HIDAYAT ULLAH MALLANA

Advocate
bc-09-0368

Date of issue: January 2019

Valid upto: January 2022



ADVOCATE HIGH COURT

کورٹ
فیس

Secretary
KP Bar Council

جناب جسٹس سجاد علی شاہ کی عدالت میں ایک کورٹ ڈیڑھ گھنٹہ کے لیے

اپیل

صورت KPK

سروس اپیل

دعوی یا جرم

تفصیل دعوی یا جرم

باعث تحریر آنکہ

D. Khan

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات کی پیشی یا تصفیہ مقدمہ بنام

مجلس بیادیت اللہ سائنس اینڈ ٹیکنالوجی AHC

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا یا زید زورہ برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ تیزی غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیشی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر بکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیلی یا بکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر واختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو مرض دعوی یا جواب دعوی یا درخواست اجراء اسانے ڈگری نظر ثانی اپیل گرانے و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثانی یا راضی نہ و فیصلہ برحلاف کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از بکھری صدر بیرونی مقدمہ مزکور نظر ثانی اپیل و گرانے و برآمدگی مقدمہ یا مشورتی ڈگری کی طرف یا درخواست حکم اتنا ہی یا قرتی یا کرتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا سنی ٹیبلٹ مٹا سیروی کا اختیار ہو گا اور تمام ساختہ پر واختہ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل گرانے یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا میرٹھ کو اپنے جہانے یا ایسے مہراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ایسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پائے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پرود نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند ہے

مورخہ 25

مضمون وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted

Humaira Khatoon

"A"

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

No.

APPEAL No. 7049 of 2021.

Regd
f

Humaira Khatoon

Appellant/Petitioner

Versus

Through - E&SE Pesh

RESPONDENT(S)

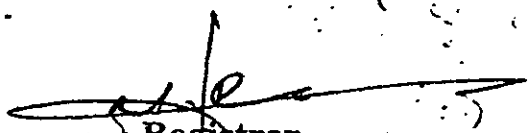
Notice to Appellant/Petitioner: Humaira Khatoon SPET

Govt. Girls High School Malana

D.I. Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 9/12/2021 at 9:00 AM.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

S.B

No.

APPEAL No..... of 20

7049

21

Humaira Khatoon Apellant/Petitioner

Versus

Through E&SE Pesh RESPONDENT(S)

Notice to Appellant/Petitioner

Malik Hidayatullah Malan

Adv. High Court D.I. Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on..... at.....

9/12/2021 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 7049 of 20 21

Raj F

Humaira Khatoon

Appellant/Petitioner

Versus

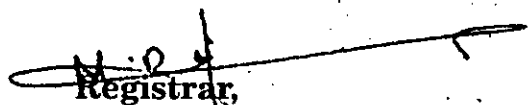
through Secy ERSE Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner Humaira Khatoon SPET Govt.
Girls High School Malana, D.I. Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 4/2/2022 at 9:00 AM at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. 8.B

No.

APPEAL No. 7044 of 20 21.

Ragd

Humaira Khatoon

Appellant/Petitioner

Versus

Through & Secy ECSE Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner

(counsel)
Malik Hidayatullah
Melana Advocate High Court
D.I Khan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 4/2/2022 at 9:00 AM at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

M.R
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar